Title VI Program

Connecticut Department of Transportation

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February 24, 2012

Margaret Griffin, Civil Rights Officer
U.S. Department of Transportation
Federal Transit Administration – Region 1
Volpe Center
55 Broadway, Suite 920
Cambridge, MA 02142-1093

Re: Title VI Program
Vendor ID: 1334, Connecticut Department of Transportation

Dear Ms. Griffin:

The Department has addressed the critical items identified in the December 20, 2011 Title VI Conditional Approval Letter. The attached Title VI Program submittal will be uploaded into TEAM for your review.

This submission has been reviewed by the Departments Title VI Coordinator and is a result of the collaborative efforts between the Office of Contract Compliance, Bureau of Policy and Planning and the Bureau of Public Transportation.

The Commissioner is committed to ensuring full compliance with all Title VI regulatory requirements and has made this priority for the Department.

We respectfully await FTA's approval of CTDOT's Title VI Program.

Sincerely,

James P. Redeker, Commissioner

Enclosure:

cc: Debra Goss, Office of Contract Compliance
Robert Card, Bureau of Finance and Administration
Michael Sanders, Public Transportation Administrator
Thomas Maziarz, Bureau of Policy and Planning

Section I -Title VI Mandate

Title VI Mandate

The information contained in this report is the Connecticut Department of Transportation's (Department) Title VI Program for the period of May 9, 2011 to May 9, 2014. The Department is scheduled to submit its next program by April 9, 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." This program was adopted in February 2012 with the approval of Commissioner James P. Redeker, as evidenced in the attached Title VI Policy Statement in Attachment VI-1.

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.

The document was developed by the CTDOT Title VI Workgroup. The group's membership consists of agency personnel from Public Transportation, Policy and Planning, Finance and Administration, the Department's Title VI Coordinator, and the Department's Associate Title VI Coordinator.

Section II - Assessment of Compliance

SECTION II: ASSESSMENT OF COMPLIANCE

The Department's Title VI Submission meets all the requirements of FTA Circular 4702.1A as it relates to the General Reporting Requirements. The Department provides this assessment of compliance that includes a summary of the equity finding of each section of the Department's 2012 Title VI submission. If an inequity has been identified, the analysis includes either a corrective action or a reason why the inequity is justifiable.

General Requirements

A. 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.

b. Title VI Complaints and Lawsuits

The Department has developed a Title VI investigation process and tracking procedures for the processing of Title VI complaints filed with the Department that allege discrimination based on race, color or national origin that are related to the Department's transit services or benefits. The Department maintains a log of all Title VI investigations, complaints, or lawsuits filed with the agency.

The complaint process is posted on the Department's website and posters are located in common public areas. The postings are also displayed in rail stations, buses and other areas of public assembly. CTDOT will periodically physically inspect posting sites to insure that postings remain current and accessible. In order to further provide information to the public, the Department will make the Title VI brochures notifying beneficiaries of their Title VI protections and how to file a Title VI complaint available at public meetings and hearings.

During this reporting period, there were three complaints filed under Title VI. One complaint had a basis under Title VI and was investigated by the Department (this complaint is currently under investigation by the Connecticut Commission on Human Rights and Opportunities); one complaint was a Title VII complaint and was referred to the appropriate area of responsibility; and one complaint was an ADA complaint which was referred to the appropriate area of responsibility. Complaints that are filed under Title VI but are determined not to have a basis under Title VI will be clearly noted on the Departments' Title VI log and will be reported to FTA accordingly.

MNR also maintains a log 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 requests copies of all Title VI complaints involving Connecticut service. MNR has been asked to provide a copy of complaints filed within 30 days of receipt.

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

c. Access to Services by Persons with LEP

The Department and its subrecipients/grantees have undertaken public outreach and involvement activities to ensure that minority, low-income and Limited English Proficiency (LEP) persons had meaningful access to programs, services, and information. The Department has a policy that adheres to the 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.

d. Promoting Public Participation (Information Dissemination)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 document is available at the following website or upon request from the Department.

The Department has also developed *Pubic Involvement Procedures* (PIP) which establishes 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 document is included in the Statewide Transportation Planning section of this document (Section XIV).

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 the PIP.

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 PIP.

The Bureau of Policy and Planning has been working with the External Civil Rights Office to identify community resources and contacts for outreach. The Department is currently updating its community outreach directory. CTDOT is also working to develop relationships with community based groups to assist in desiminating information to their constituents

C. 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 and complaint procedures are also posted on bulletin boards throughout the agency and will be posted in public areas serving the beneficiaries of public transportation.

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

The Department has also determined that in order to better communicate to the public their rights under Title VI we will provide notices at public meetings and hearings. We will also be translating the Title VI brochure in languages other than English. Spanish will be the first language translated, it is expected that we will complete the process by March 2013.

D. PENDING APPLICATIONS FOR FINANCIAL ASSISTANCE

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

E. ANALYSIS OF CONSTRUCTION PROJECTS

A listing of projects in all active grants and the delineation of the type of environmental review conducted for projects initiated during the period since the last Plan submittal is contained in Section VIII.

The Department currently utilizes consultants to conduct the Title VI analysis on proposed projects. The CTDOT Title VI Coordinator currently reviews the draft and final EA and EIS documents. As a result of the reviews the Title VI Coordinator has asked the Bureau of Policy and Planning to look at the scope of services used to hire consultants that are responsible for developing the Environmental Documents to insure that it is clear what they are expected to do when performing a Title VI analysis; as a result the Bureau of Policy and Planning is developing a scope of services that will adequately address all areas required to insure a thorough Title VI assessment.

II. Program Specific Requirements for Recipients Serving Large Urbanized Areas

The Department's 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.

The Department is a direct recipient of FTA Section 5307 and 5309 funds. The Bureau of Public Transportation oversees a variety of alternatives to driving alone in the state's three large urbanized areas, including express and local buses, two rail lines, and other services to reduce traffic congestion and improve mobility in Connecticut.

Passenger 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. The service is provided by the New York Metropolitan Transportation Authority (MTA) through its subsidiary, Metro-North Railroad (MNR).

Metro-North has been requested to submit a copy of their Title VI report to the Connecticut Department of Transportation's Office of Contract Compliance for review. The document will be reviewed to determine if the content meets the requirements under Title VI relative to Connecticut based services and activities. If there are areas of the plan that do not comply with the requirements under Title VI, the Department will request an action plan and establish a time-line for Metro-North to make the appropriate corrections. The Department has requested quarterly teleconferences with Metro-North to discuss Title VI implementation, and to obtain updates relative to Connecticut based Title VI complaints.

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.

Bus Services

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 urban services also include 21 commuter express routes operating in the Hartford region and one express route in the Stamford region.

Complementary ADA paratransit services are operated in each urbanized service area to support the fixed-route services.

Rural Transit Services - The Department also oversees the funding and operations of five subrecipient rural transit districts under the Section 5311 Program. Title VI requirements for the 5311 non-urban program are covered in Section III below.

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. Details for the process followed can be found 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 ¾-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 for information on mapping methodology and samples of statewide and localized maps.

e. Monitoring Transit Service

The Department monitors the transit services throughout the service areas to compare the level of service provided to low-income and minority areas with service provided in other areas.

The Department followed a locally developed methodology as allowed in Option D: Locally Developed Alternative in Chapter 5, Section 5 of Circular C 4702.1A. The methodology combined the characteristics of the methodologies described in options A and B of the Circular: Level of Service and Quality of Service Methodology. A sampling of Census tracts is selected in each of the three urbanized areas of over 200,000 in population in the state and an assessment of route performance for

bus services and rail services (if available in the selected tract) is made in comparison to the established service policies and standards associated with the distribution of overall service, on-time performance, distribution of amenities and vehicles, and security. If differences exist in any of these factors, the Department determines whether the differences are significant. If significant disparities in one or more quality of service indicators are confirmed, the Department determines why the disparity exists and takes corrective action to correct the disparity.

The analysis of the level and quality of service and any mitigation is not complete. After a first run through, the Department is reviewing the sample size to determine if the sample size needs to be revisited in order to assure confidence levels. The approach to this task, the sampling methodology, and samples of the analysis to-date can be found in Section XIII. When the analyses and assessments are complete, the information will be forwarded to FTA and uploaded to TEAM.

III. PROGRAM SPECIFIC REQUIREMENTS FOR STATE DEPARTMENTS OF TRANSPORTATION

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

a. Statewide Transportation Planning

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

b. 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. A brochure and Title VI policy statement are sent to all subrecipients. Examples of relevant documents that provide compliance awareness, assistance and monitoring can be found in Section XV.

The Department uses a number of different tools to monitor the Title VI compliance of subrecipients/grantees. Routine program oversight including reviewing Title VI submissions and observing compliance on site visits is the most important ongoing tool used. The Department also utilizes a Compliance Assessment document to monitor subrecipients. The Title VI assessment of every subrecipients/grantee is conducted every two years.

The Department is in the process of a follow-up to the 2009 Title VI assessment survey. The notice for the 2011 assessment was sent to FTA subrecipients on August 23, 2011. 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. The results of the 2009 review are provided in Section XV of this Program document, and the results of the 2011 assessment will be made available upon completion.

c. The Department's procedures for passing through FTA financial assistance in a non-discriminatory manner are provided in Section XV. Also, the information requested from applicants will be modified to capture information regarding those applicants serving low-income communities. This information was not being captured.

d. The Department's processes for providing assistance to potential subrecipients has been greatly enhanced and will be monitored to determine its effectiveness in insuring that the benefits of federal funding are reaching impacted communities. This process is provided in Section XV.

Section III - Certifications and Assurances and Title VI Policy Statement

(The signed copies of the Certifications and Assurances and Title VI Policy Statement are included in the "Attachments")

Section III-1

Certifications and Assurances

Section III-2

Connecticut Department of Transportation Title VI Policy Statement

Overview of Federal Fiscal Year Annual List of Certifications and Assurances

CTDOT must submit Federal FY Certifications and Assurances to FTA applicable to all projects for which the CTDOT seeks funding during the Federal FY. FTA requests that CTDOT submit all of the twenty-four (24) categories of the Certifications and Assurances that may be needed for all projects for which the CTDOT intends to or might seek Federal assistance in the Federal FY. Selecting and submitting these Certifications and Assurances to FTA signifies CTDOT's intent and ability to comply with all applicable provisions. In order to assure FTA that CTDOT is authorized under State and local law to certify compliance with the FTA Certifications and Assurances it has selected, FTA requires CTDOT to obtain a current (Federal FY) affirmation signed by the Attorney General's Office affirming CTDOT's legal authority to certify its compliance with the FTA certifications and Assurances that have been selected. The Attorney General must sign this affirmation during the Federal FY. Irrespective of whether the Applicant makes a single selection of all twenty-four (24) categories of FTA Certifications and Assurances or selects individual categories from the FTA Certifications and Assurances, the Affirmation of the Attorney General from a previous Federal FY is not acceptable, unless FTA expressly determines otherwise in writing.

Once the Annual Certifications and Assurances have been signed by the Attorney General and CTDOT, the Annual Certifications and Assurances must be signed via PIN number in FTA's Transportation Electronic Award Management (TEAM) system.

Section IV - Complaints and Lawsuits

(The Title VI Complaint Tracking Log is included in the "Attachments"):

Section IV-1 Title VI Complaint Tracking Log

Title VI 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 first items that must be determined by the Investigator from the Respondent, are 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 the 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 the Respondent followed or did not follow the normal policies and procedures when making the decision or taking action involving the Complainant;
    5. Evidence establishing whether the 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.

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 pursuant to Title VI will not be processed as a Title VI complaint. Individuals will not be discouraged from filing a written complaint.

Internal Complaint Procedures

Written complaints filed with the Department 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, 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
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 sent to the appropriate official(s) at the respondent's facility. Contact is made with the Respondent to advise him/her of the complaint and to determine the appropriate official(s) to interview.

The cover letter to transmit the Request for Information should explain the process and provide information regarding any meetings that have been scheduled. Modify the cover letter to satisfy the circumstances. Provide the Request for Information to the Respondent prior to conducting the on-site visit. This will facilitate the availability of evidence during the on-site visit.

Conducting Interviews

Interviews are conducted of witnesses who can provide information that will either support or refute complaints. A list of major questions should be prepared that address the issues involved in the complaint. During the interview, the following steps are recommended:

- Introduce yourself and outline the interviewing process
- 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 contacts 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, changes are made as appropriate to the Investigative Plan based upon any new 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. You will need to discuss the Request for Information with the Respondent and be able to explain the need for requesting any document on the list. The Respondent is informed of their right to submit a formal position statement

addressing the Complainant's allegations. The Investigator may also question the Respondent regarding possible settlement opportunities.

WITNESSES – The 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.

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 by 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 should be related to issues cited in the complaint. An evidence request should contain some or all of the following:

- The policies and procedures regarding the practice that Complainant has alleged;
- All documents relating to the Respondent's dealing with the 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 has occurred. When analyzing data you must:

- Review what happened to the Complainant
- Compare the Complainant's treatment with the appropriate policies and procedures;
- Compare the Complainant's treatment with others in the same situation;
- Review the Respondent's reason(s) for the treatment afforded the Complainant; and
- Compare the 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)

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.

Note: The following complaints were submitted to the Department as Title VI complaints but upon review were determined to have no basis under Title VI.

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 the 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 CTTransit 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 – Limited English Proficiency (LEP) Plan

(The following Listing of Public Meetings document is included in the "Attachments")

Section V-1 Listing of Public Meetings

Message from the Commissioner

The Connecticut Department of Transportation's approach to serving our Limited English Proficient (LEP) populations is to take affirmative steps to assure that all communities have full access to public transportation services and activities.

CTDOT is committed to taking reasonable steps to provide meaningful access to vital information and services for LEP stakeholders who use our services, facilities and programs, and who attend our meetings and events.

James P. Redeker
Commissioner

LIMITED-ENGLISH-PROFICIENCY IMPLEMENTATION PLAN

LEP Overview

On August 11, 2000, President Clinton issued Executive Order 13166, entitled "*Improving Access to Services for Persons With Limited English Proficiency"* (LEP).

On December 14, 2005, the United States Department of Transportation (DOT) published revised guidance for its recipients on the implementation of Executive Order 13166. The Census definition of a Limited English Proficient (LEP) person is "…a person who speaks another language other than English at home and does not speak English well or not at all."

As a recipient of Federal Transit Administration (FTA) funding the Connecticut Department of Transportation (Department) takes reasonable steps to ensure compliance with Title VI of the Civil Rights Act of 1964, as amended. The Department adheres to acceptable compliance standards ensuring reasonable access to all federal-aid Programs and activities by LEP persons. CTDOT supports the goals of the DOT LEP Guidance and is committed to taking reasonable steps to provide meaningful access to LEP stakeholders who use our services, facilities, and programs, and who attend our meetings and events.

CTDOT is committed to complying with the requirements of Title VI, Executive Order 13166, and DOT LEP Implementing Guidance.

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 200d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nicols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination.

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" Reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

The U.S. Department of Transportation (DOT) published revised LEP guidance for its recipients on December 15, 2005, which states that Title VI and its implementing regulations require that DOT recipients take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. The Federal Transit Administration published its LEP Guidance in its Circular 4702.1A "Title VI Dependent Guidelines for FTA Recipients" on April 13, 2007, which requires recipients to develop an LEP implementation plan consistent with the provisions of Section VII of the DOT LEP guidance.

This document provides the Department's Four-Factor Analysis that includes: Identification of LEP Individuals in the CTDOT transit service area who need language assistance, the nature and importance of transit to LEP individuals and available resources and costs of providing language assistance services. This document also includes the Department's 2012-2014 Language Assistance Plan (LAP) which is composed of descriptions of language assistance measures employed by CTDOT, the status of efforts to implement the LAP. Finally, the document presents the Department's LEP Implementation Plan that includes the language initiatives planned for the next three years

This section will also refer often to Section XII of the Program Submission where a series of maps has been used to identify people with LEP characteristics for purposes of developing communications and outreach in accordance with Title VI requirements.

LEP Activities

Successful Activities to Continue:
Continuing development of partnerships with community organizations that serve LEP populations; translation of notices, and multi-lingual websites.

New Areas of Focus
Language Assistance: Provide free language assistance for non-vital yet important outreach documents and in-person interpreter services for events where the public testimony is solicited.
Vital Documents: Determine which documents are vital for translation, and choose the format's to most effectively communicate the messages contained in those documents.
Training: Train front line and other staff to effectively engage and respond to LEP customers.
Definitions and Standards: Develop a method to ensure consistency in the application of competency standards for interpreters and translators.
Customer Information: Provide timely, relevant information about CTDOT programs and services to LEP communities in the LEP Languages.
Outreach: Conduct culturally-competent outreach to LEP communities to increase awareness and use of CTDOT services and programs.
Research and Administration: Develop a means to assess and monitor the effectiveness of CTDOT's LEP Plan internally and externally on two levels:

1. Ongoing review to immediately address any critical issues and make changes to the LEP Access Plan as needed.

2. Annual review to include any changes in demographics, types of services, or other LEP community needs.

LEP Access Planning Process

To prepare a viable LEP Access Plan, CTDOT convened a LEP Workgroup to conduct the assessment of the Department's interaction with LEP Populations. Staff members from throughout the agency were hand-picked for the workgroup. The group included staff from public transportation, planning, civil rights and administration.

This workgroup was tasked with the following:

1. Perform a needs assessment to identify high concentrations or high numbers of LEP individuals and determine if there were language barriers limiting the access of LEP persons to CTDOT services.

2. Developing a LEP plan and providing a framework for the provision of timely and reasonable language assistance to those with limited English proficiency who access CTDOT services and a method to evaluate and review the effectiveness of a LEP Plan.

3. Report findings to management with recommendations and timelines for compliance with federal regulations.

Staff members were tasked with developing a work plan and helping the group complete the LEP assessment and plan. Workgroup members collected and analyzed data, audited agency databases and communication materials, and conducted research among CTTransit operators.

The following is a summary of the results from the Workgroup.

Applying the Four-Factor Analysis

The Workgroup's LEP assessment was based on the Four-Factor Framework outlined in the DOT LEP Guidance:

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 Eligible to be Served or Likely to be Encountered in the Service Area

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 Department has researched and used several tools in order to determine the number and proportion of LEP persons eligible to be served or likely to be encountered by the transit system.

Census/ACS Data - The primary tool used for Title VI study was the data from U.S. Census Bureau. In the Department's 2009 Limited English Proficiency (LEP) Plan, the Year 2000 U.S. Census data was used. For this 2012 update, the Department is using the American Community Survey (ACS) 2005-2009 data, which is also available on the U.S. Census Bureau website. The demographic analyses of the statewide, bus and rail service areas identified Spanish, Portuguese, Polish, Vietnamese and French as the top five languages spoken by people meeting the LEP standard of "speaking English not well or not at all".

PLEASE REFER TO LEP LANGUAGE MAPS AND CHARTS

(PLEASE REFER TO LINK PROVIDED BELOW)

- *Connecticut Statewide LEP Language Map*
- *Connecticut Statewide LEP Language Chart*
- *Connecticut Bus Service Area LEP Language Chart*
- *Connecticut Rail Service Area LEP Language Chart*

LEP populations meeting the Federal Guidelines for LEP "Safe Harbor" thresholds (5% or 1,000 individuals, whichever is less) include people who speak English "Not well" or "Not at all."

An analysis conducted indicates that out of the total population of 1,859,771 residing within the bus service area, there are over 81,086 people or 4.3% who speak English "Not well" or "Not at all."

Another analysis conducted indicates that out of the total population of 1,401,735 residing within the rail service area, there are over 84,494 people or 6.0% who speak English "Not well" or "Not at all."

The proportion of LEP population varies greatly around the bus service area. This variance is shown on both the mapping and the LEP data sheets included in Section XII. The Mapping for each tract indicates where the percentage of LEP persons exceeds the average

PLEASE REFER TO LEP MAPS AND CHARTS
(PLEASE REFER TO LINK PROVIDED BELOW)

- *Connecticut Statewide LEP Map*
- *Connecticut Bus Service Area LEP Map*
- *Connecticut Rail Service Area LEP Map*
- *Connecticut Statewide LEP Chart*
- *Connecticut Bus Service Area LEP Chart*
- *Connecticut Rail Service Area LEP Chart*

Note: The CTDOT web page for Title VI study is located at:
http://www.ct.gov/dot/cwp/view.asp?a=3529&q=305564&dotNav=|

In addition, the Department looked at the occurrence of LEP populations statewide meeting and going beyond the customary definition of LEP "Safe Harbor" thresholds(5% or 1,000 individuals, whichever is less) for the purpose of inventorying languages that are widely spoken even if we go beyond the customary definition of LEP. For this exercise the Department included in the counts anyone who spoke English "not at all" or "less than well" but also included the next grouping of people so that the new population included everyone who spoke English "less than very well." This would overstate the number of speakers by including some number who probably could communicate effectively in English, but who might benefit from special assistance or resources. Using this more broad interpretation of the population, the following languages and the number of speakers the language were:

Spanish or Spanish/Creole:	130,864
Portuguese:	17,886
Polish:	15,612
Italian:	12,121
Chinese:	10,118
French:	7939
Russian:	5003
French Creole:	4908

Other Indo-European:	4826
Vietnamese:	3981
Korean:	3639
Other Asian:	3440
Other Indic Languages:	3198
Other Slavic:	2362
Greek:	2358
Gujarati:	2163
African Languages;	2128
Serbo-Croatian:	2105
Tagalog:	2033
Arabic:	1999
Urdu:	1766
German:	1712
Hindi:	1551
Laotian:	1412
Japanese:	1328
Cambodian:	1163

Using this listing of languages, the Department has an additional resource that can be used when special actions or decisions are considered regarding the level of accommodations needed for non-English speakers.

Other Language Resources - Other potential data sources were analyzed but for the moment only the mapping and the data charts that were generated are being used as the first level of analysis of population demographics during the analysis of the service area.

While school district data can often give good indicators of how many students or families of students require language services in other-than-English, the Department reviewed information available from the State Board of Education. The detail was not adequate to provide meaningful insights into how such information could be used in the statewide planning process. The Department also considered using local school district data. With over 100 school districts in the Department's rail and bus service areas, as an overall tool this alternative language data would be unwieldy to collect and likely not that revealing to show statewide and system-wide trends.

However, on a more local level, when individual projects are being planned or localized services are being considered for change, an additional, more detailed set of data is required, and other resources will be called upon. In addition to using the local Census/ACS maps such as are included in section XII as examples, the Department intends to include consultation with community organizations to discern pockets of LEP population that may not be evident on mapping, and, if the information is available and can be made public, looking at school district data for language characteristics of their population. This Census information and the information that might be gleaned from other resources will assist in better informing local populations of plans, and better engaging them in the planning process.

In areas determined to have large numbers of LEP persons, either showing tract-wide proportions above the service area average, or meeting the Safe Harbor Thresholds, the Department will also conduct outreach to organizations that work with LEP populations. This will include local governmental agencies, religious organizations and community based organizations. This information will allow the Department to better understand the languages, trends and the services used by LEP persons. The Department has compiled a resource directory of organizations that will be used for this outreach. The directory is available on the Department's website (http://www.ct.gov/dot/cwp/view) or can be provided upon request. The Directory will be updated periodically to insure that it is current and inclusive.

Conclusions and Recommendations:

The Department will prioritize our efforts to provide language assistance to those groups identified with the most demand. Given the large size of the Spanish-speaking LEP population,this would be the group to focus on first – especially for more expensive activities such as distribution of written translations. However, less expensive actions, such as oral translations, might also focus on the top five or soso langautges. In addition, outreach may be different in different divisions based on the populations in their areas?

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.*

The Department has researched and used several tools in order to determine the number and proportion of LEP persons that are encountered or served by transit in the normal course of business and the frequency of encounters with the system. The workgroup concentrated on an internal audit of LEP contact information generated by agency personnel, technological systems, and survey research.

Limited survey information has been available to routinely capture LEP contact data either from technological systems or from standard survey data.

The Department first examined its prior experiences with LEP individuals. Information was gathered using the following methods: conducting a survey of front-line employees who interact with the public; a review of the use of website alternative language tools; and ridership surveys.

Survey of Front-Line Employees – The Department determined that an important 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 of 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 who 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.

Website Data Translations – The second tool that could be used to gauge the level of interaction in order to improve the customer experience for LEP individuals was to analyze the use of website alternative language use.

CTTransit already provides a Spanish version of its website. CTTransit also offers Google Translate on its main website as well as on the websites of all other Departmental subrecipients. MNR and SLE websites offer machine translations into Spanish and a number of other languages using Google Translate.

Google Translate on websites is just one tool that can be used to measure the level of interaction by LEP individuals. Google Translate offers machine translations so it is generally not desired to rely upon Google Translate for routine or frequent translation. But the Department has found that the major transit websites should have Google Analytics (GA) installed so that speakers of some of the non-Spanish, non-English languages can at least get some idea of the information on these websites, and so that Google Translate interactions can be tracked and give some indication of the number and variety of different languages that website visitors request. For the two major websites under the direct control of the Department, 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 has for now been 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 for now has been established at 1% of all website visits for the quarter.

Other Service Websites – The Department notified all rural operators and other private public transit contractors delivering transit services that they were to add Google Translate and use Google Analytics on their sites and report the results quarterly.

In summary, less than two percent of all visits to the CTTransit or SLE websites involve use of language assistance services. This statistic is only one measure, and not a very reliable measure, of the demand from customers or potential customers. But the analytics for these interactions are fairly consistent with data from other sources on the occurrences of various other non-English languages. Surveys of front-line employees show that LEP interactions are not a significant problem at this time, though it could be assumed that many potentially significant LEP issues are not reported due to the language barrier itself.

Additional measures will also be used in the future to assess level of interaction.

Intuitively it is expected that a substantial portion of the LEP encounters with state-owned transit services will occur on the bus or train. Accordingly, it is reasonable that resources for language assistance be focused heavily on on-board activities. To validate the intuition and assess potential impacts, two additional work tasks will be undertaken.

Statistical Analysis - The first will be a simple statistical analysis...Ridership counts by bus route and LEP population by transit operating division will be utilized as the base data to determine LEP persons that ride CTTransit. Estimates of LEP encounters would be made by determining bus ridership for the general population in each division and next, applying the percent of LEP population in that jurisdiction, to determine the potential LEP persons that would ride CTTransit by service area, if LEP persons rode at the same rate as the general population. However, the table in Factor #3 below from the American Community Survey that was used to validate the Department's assumptions on language data collected to-date shows, Spanish is the predominant non-English language used. And when the data is cross-tabulated, it can be seen that the use of non-English languages is three times more likely to occur among transit users, and that Spanish is still the non-English language used by the majority of workers, whether they are transit users or not. (NOTE: The table's numbers will differ from our other analyses since the survey uses statewide data, not just the transit service area, and uses workers, not the total population.) Therefore, the final step of this simple statistical analysis will be to expand the forecast LEP incidence number by three times. The results will indicate an estimated number of LEP persons that are likely to ride CTTransit each day and the percentage of all bus riders that that represents.

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

Survey Analysis - In addition, the CTTransit ridership survey has also been extensively redesigned to gather income, race and LEP information and will enable such demographic data to be cross-tabulated with ridership levels to help assess frequency of interaction. The latest bus system survey was conducted in November 2011. The initial returns indicate the Department should be getting some good feedback on number of interactions with the system by LEP populations.

A total of 4,143 surveys were returned. By operating division, counting only valid surveys returned, there were 2,031 English-language responses from customers (local and express services) in greater Hartford; 930 in New Haven, and 377 English-language forms from the Stamford Division. It is interesting to note that 77 surveys were completed in Spanish by Stamford-area customers, a significant percentage of the returned surveys for that Division (nearly 17% of the whole). Over 34% of Stamford responses picked "yes" on the question of whether a language other than English was spoken at home (compared to just under 21% in Hartford and a little over 19% in New Haven). The English-language responses gathered in the other Divisions totaled: 276 from Waterbury; 113 from New Britain; 81 from Meriden, 50 in Bristol, and 16 from Wallingford passengers.

The breakdown by Division and by English-Spanish is:

	English Response	**Spanish Response**	**Total by Division**	**Spanish as a Percent of Total**	**Percent Response Online**
HARTFORD	2031	63	**2094**	3%	15%
NEW HAVEN	930	40	**970**	4%	14%
STAMFORD	377	77	**454**	17%	6%

WATERBURY	276	21	**297**	7%	8%
NEW BRITAIN	113	17	**130**	13%	6%
MERIDEN	81	9	**90**	10%	20%*
BRISTOL	50	0	**50**	0%	40%**
WALLINGFORD	16	3	**19**	16%	5%

The ridership survey was also distributed to users of the ADA Paratransit systems.

A total of 509 paratransit surveys were returned. Of the 507 valid surveys returned and analyzed, these included 293 English-language responses from customers in Greater Hartford, 33 in New Haven, and 51 from Stamford. It is interesting to note that the return on Spanish surveys for Paratransit ridership was low. Only 7 results were returned in the Hartford division making up 1.38% of the returns of all the paratransit surveys received. The English-language responses gathered in the other divisions totaled: 93 from Waterbury, 7 from New Britain, 13 from Meriden, 1 from Bristol, and 6 from Wallingford.

PARATRANSIT SURVEY	English Response	Spanish Results	Total by Division	Spanish as a percent of total	Percent Response Online
Hartford	293	7	300	1.38%	0%
New Haven	33	1	34	0.2%	0%
Stamford	51	2	53	0.39%	0%
Waterbury	93	0	93	0%	0%
New Britain	7	0	7	0%	0%
Meriden	13	0	13	0%	0%
Bristol	1	0	1	0%	0%
Wallingford	6	0	6	0%	0%

When the analysis of the survey results is completed, these survey results will likely give a better indication of language interaction issues among our riders.

Mapping Tools - The new mapping as shown in Section XII will also provide CTDOT with a stronger tool for identifying language "Hot Spot" locations 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.

Enhanced Data Collection Tools - In addition, the Department intends to enhance its outreach to community organizations and other groups in the three-year action plan that will follow in the Language Assistance Plan (LAP) below. These steps will assist with assessing the current gaps in dissemination of transit information to current users due to language barriers and try and identify new potential customers who may not now be accessing the system, especially those not accessing the system due to language barriers.

The types of approaches being considered at this time include:

- Collecting daily alternative language experiences from employees, especially those with much routine contact such as drivers and telephone call center employees.
- Conducting an inventory of community-based organizations in the various service areas and administering surveys or initiating conversations with them to determine any language gaps;

- Using data from the Department of Social Services to determine hot spots of non-English-speaking recipients of public services through the DSS;
- Utilizing the resources of 211 InfoLine to collect information on language barriers of their callers. 211 InfoLine has a very good language assistance program since they are a major resource in delivering non-emergency information services to the state's population. The Department already has several projects in conjunction with 211 InfoLine that can be built on to collect additional information on language use by callers seeking transportation or other information;
- For localized projects, test the availability of language information from local school districts in the project area to see if the information on language use is available and in sufficient clarity and detail to be of use to project outreach staff.

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

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. Providing services to insure access to LEP persons may help to increase and retain ridership among CTTransit's LEP communities. The Workgroup determined that the Department's most critical services were defined as fares and tickets; routes and schedules; and safety and security. These areas were selected because barriers in these areas could: 1) limit a person's ability to gain full benefit from services, or 2) safety and security issues could place a person in physical danger.

The table below demonstrates why transit is more important to people who don't speak English than it is to the general population. Only 8% of all workers speak English less than very well while 23% of workers that take transit speak English less than very well.

ACS Table B08513 (2006-2010)
CT Statewide

Total Workers 16+	1,713,303		
Speak English Only	1,363,189		
Speak Other Languages	350,114		
Speak English "very well"	206,381		
Speak English less than "very well"	143,733	53%	Spanish Speakers
Percent of Workers Speaking English less than very well	**8%**		
Public Transit Users	**55,778**		
Speak English Only	33,836		
Speak Other Languages	21,942		
Speak English "very well"	9,368		
Speak English less than "very well"	12,574	63%	Spanish Speakers
Percent Worker Transit Users that Speaking English less than very well	**23%**		

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.

Therefore, the Department has determined that most of its basic communications methods should be addressing LEP populations. Based upon the observed data and the threshold of usage of various non-English languages, this will include manual translations into Spanish for all information websites, service and fare change brochures, Title VI-related documents such as "Your Rights Under Title VI" and descriptions about how to file a Title VI complaint, and the availability at all times of Spanish-speaking telephone operators.

A full description of the services for Spanish speakers, as well as the process for requesting provision of native tongue services for other non-Spanish LEP persons will be described more fully in the Language Assistance Plan (LAP) below.

Further, and as will be described in the LAP, the Department will also be initiating a program of using pictograms or other non-language tools whenever possible to illustrate emergency procedures, travel directions, etc.

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. 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 of the Four Factor Analysis allows the Department to weigh the demand for language assistance against current and projected financial and personnel resources. This analysis helps determine if the language services currently provided are cost effective and helps to plan future investments, so that the most needed assistance is provided to the greatest number of LEP persons within the limits of the Department's resources.

As described in Factors 1 and 2 above, the Department used various strategies for determining non-English language populations and interactions. The approach included using results from Census and American Community Survey data and mapping, website use, employee surveys, and other tools to gauge the level of interaction of customers with various aspects of the transit system. The Department determined at what point consideration would be given to implementing language assistance services and in which languages. The Department determined that for consideration of widespread use of language assistance services for a non-English language, the Census and ACS data would be the first tool, though it doesn't measure interaction with or importance of the transit system. The historical utilization of various websites and interactions with staff or resources of the system would also weigh into the consideration of trigger points for which languages to offer special assistance in. The trigger for the website or employee interaction was initially established at 1% of the total interactions. (The 1% threshold would only apply to service-area-wide programs and services. Similarly, system-wide proposed changes would consider the Safe Harbor Thresholds regardless if there was website or employee interaction at any level. Specific services or projects might result in the need for interactions with various language groups regardless if the overall website or employee interactions were still lower than that 1% threshold set by the Department.)

In fact, no other language came close to the 1% figure except for Spanish. Spanish has been the only language translated as a matter of course in the CTTransit system due to long-term demand for information in that language. The website and other routine communications with customers have been using Spanish for many years prior to the LEP program's initiation. So the data validate that decision made years ago to translate documents into Spanish. And, on the surface, the data did not on its own indicate any great demand for any other specific language.

With the number of different tools used to determine the level of interaction between customers and the program, and the latent expressed need for other languages to be used, only Spanish hit that threshold. But the Department and its contractors will be making changes to internal procedures to better track interactions in other languages and will reassess the threshold proposed and the trigger points at which any other general actions or specific translation services might be valuable and demanded. For example, the following language will be added to the documents disseminated to the customer base:

> "Any persons requiring or desiring any document to be translated or requiring other language assistance can request such assistance by contacting (your local transit service provider) at xxx-xxx-xxxx, or in writing to 123 Main Street, Anywhere CT."

This notice can also be posted in various languages based upon the expectations of the languages that might be encountered through that venue.

While expenditures related to providing language assistance have not necessarily been closely tracked historically, The Department 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. But certainly at this level, the investment is not out of proportion with the number of LEP beneficiaries.

The Department will continue to expend a reasonable portion of the budgetary dollars to meet compliance goals and fulfill the provisions of the language assistance plan. The Department recognizes that to continue to expand the program, new sources of internal and/or external funding might be needed depending upon the cost and scope of new strategies and actions.

Current Language Assistance Measures

Current Language Assistance Measures

DOT Guidance: *"An effective LEP plan would likely include information about the ways in which language assistance will be provided.*

The Department supports the goals of the DOT LEP Guidance to provide meaningful access to its services by LEP persons.

The information, presented above in earlier elements of the Four-Factor Analysis, and the predominance of Spanish-speaking LEP persons, helped tailor the specific type of language assistance CTDOT provided its LEP ridership during the reporting period. And future plans will be presented in the LAP.

The following section provides the status of the Department's initiatives previously established to address potential access barriers faced by LEP customers. The agency currently offers a number of language assistance services, including, those listed below.

Oral Translations

All Modes:

The Department has its own list of firms that provide transportation and interpretation services. (See LEP Exhibit A: A Reference Guide to Translation and Interpretation Services).

In addition, through the Department of Administrative Services (DAS) the state has contracts for translation and interpretation services that any state agency including the Department can access.

Telephone translations: Four companies selected, 69 languages, ranges from $.78 to $.93 per minute:

http://www.das.state.ct.us/contracts/010_0053.pdf

In-person translations: 13 companies selected, 6 languages, variable pricing – per hour or per word:

http://www.das.state.ct.us/contracts/010_0054.pdf

The Department also has a listing of employees that have stated they are proficient in languages other than English. This resource is used by CTDOT to assist LEP persons. See LEP Exhibit B.

Rail

MetroNorth (MNR) Travel Information Center – Consistent with Metro-North's Title VI Program, MNR customers have multi-language transportation available through an outside language line telephone service

Bus

CTTransit provides oral information in Spanish through telephone Customer Service Center. LEP customers who call the Telephone Center have direct access to bilingual customer service representatives and can be connected to a telephonic interpretation service with linguists who speak other languages

Written Translations

All Modes

Written translations are available through some of the companies on the Department listing in LEP Exhibit A or through the DAS contracts also specified immediately above.

Rail

- MNR and SLE websites offer machine translations into Spanish and a number of other languages using Google Translate.
- MNR utilizes print and electronic media sources and language translations to communicate with the public and riders, including offering multiple language formats on ticket vending machines.

Bus

- CTTransit provides a custom-translated Spanish version of its website. The Department also offers Google Translate on the CTTransit main website and all of the websites of the Department's subrecipients
- All policy and informational interior notices on buses are also posted in Spanish.
- All written public informational communications materials are printed in Spanish.
- Materials critical for accessing and using CTTransit services and receiving transit benefits have been translated. Upon request, various documents identified as "vital" can be translated into the regularly encountered languages in the region. If requests are received from individuals or organizations serving the LEP population, determinations can be made on a case-by-case basis about the necessity to do custom translations.
- At this time, no inquiries have been received requesting translation into other languages besides Spanish.

Public Outreach and Communications

Rail

- MNR News releases are distributed to media outlets that include the Amsterdam News and Spanish print and cable
- MNR advertises in local language paper LaVoz and local newspaper websites including Spanish language sites.

Bus

- The Department and CTTransit provide written notification that language assistance services are available, upon request, free of charge for all public meetings and hearings. In the future, this notification will also describe the patron's Title VI rights and the CTDOT and CTTransit Title VI complaint process.
- The Department and CTTransit work directly with the ethnic media to provide service information to their readers, listeners, and viewers. See LEP Exhibit C.
- CTTransit places Spanish language signage on vehicles to announce service changes and other situations important to customer safety.
- The Department is aware that some documents are translated into other languages by community organizations. For example, the Polish Community Center in New Britain does translate our public information brochures and meeting notices into Polish and posts them on their own website for use by their Polish-speaking stakeholders.

Language Assistance Plan

Efforts to Identify Additional Language Assistance Needs

The Department is committed to conducting enhanced outreach to determine what language assistance measures could reduce the barriers that limit access to its information and services by LEP persons.

To that end, some key activities will be undertaken over the next three years to determine the level of unmet need for language services, and develop and implement a strong program of enhanced language assistance services.

The Department intends to enhance its outreach in the three-year action plan to assess the current gaps in dissemination of transit information to current users due to language barriers and try and identify new potential customers who may not now be accessing the system, especially those not accessing the system due to language barriers.

The types of approaches being considered at this time include:

- Changing internal procedures to allow the collection of data in real time by drivers, telephone agents and other employees.
- Conducting an inventory of community-based organizations in the various service areas and administering surveys or initiating conversations with them to determine any language gaps and considering ways for those organizations to be a supplemental resource to the community;
- Using data from the Department of Social Services to determine hot spots of non-English recipients receiving public services through the DSS;
- Utilizing the resources of 211 InfoLine to collect information on language barriers of their callers. 211 InfoLine has a very good language assistance program since they are a major resource in delivering non-emergency information services to the state's population. The Department already has several projects in conjunction with 211 InfoLine that can be built on to collect additional information on language use by callers seeking transportation or other information;
- For localized projects, test the availability of language information from local school districts in the project area to see if the information on language use is available and in sufficient clarity and detail to be of use to project outreach staff.

The Department has already begun the process of creating both paid and unpaid internships in cooperation with the regional campuses of the state university system. Targeted tasks for this group of interns will be more widespread than just LEP, but for the purposes of this section most of the proposed outreach tasks will be relevant.

The Department will be developing a program to reach out to a broader base of community organizations region-wide (regardless of LEP issues) in order to assure enhanced public involvement in the transportation planning and transit service planning process. A natural by-product of this initial outreach effort will be to learn first-hand what types of special language assistance services would best meet the needs of the agencies and their LEP clients.

The outreach interns can also be used to make site visits to areas with high LEP concentrations to observe travel patterns, and visit businesses and organizations in those targeted areas to drill down deeper into the language needs of the agencies and clients, as well as provide a "face" for the Department in the community and bring back feedback regarding transit services as well as gaps in language services.

Additional Language Assistance Services to be Provided by the Department

It is expected that a more robust list of potential activities and language assistance services will be developed as a result of the outreach efforts to be conducted. Prior to those results, there are a number of resources that could be used that could provide access to LEP individuals at minimal costs. These could 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 provide accurate interpretations that do not cause delay or other costs.
- Centralizing interpreter and translator services to achieve economies of scale.
- Formalized use of qualified community volunteers.
- Placing native language ads in publications serving alternative language populations to share current significant service related announcements.
- Continuing to develop partnerships with community organizations that serve LEP populations.

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

Procedure

The Department provides notice of "right to language assistance" at no cost for non-vital yet important outreach documents, including project fact sheets, meeting notifications and other open house materials. The Department will continue to determine which documents are vital for translation and choose the format(s) to most effectively communicate the messages contained in the vital documents; provide timely relevant information about CTDOT programs and services to LEP communities; and develop a means to assess and monitor the effectiveness of CTDOT's LEP Plan.

The Department will translate vital written materials into the languages identified as frequently encountered, or likely to be affected by specific actions. The decisions regarding which documents to be translated will be significantly impacted by feedback from the LEP community. This feedback will be collected by front-line employees who will receive new training in new procedures to be followed when they encounter an LEP customer including the use of "I Speak" cards for bus and train operators and other front-line employees. This improved outreach will be supplemented by the use of printed documentation at the various locations where customers or potential customers go for transit information or with questions.

Pending an enhancement to the list as more outreach is conducted, 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, waiting rooms, reception areas, and other initial points of public contact
- Notices of public hearings regarding CTDOT's proposed transportation plans, projects, or changes, and reduction, denial, or termination of services or benefits.

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- Notices advising LEP persons of free language assistance and language identification cards for staff,
- 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 (e.g., ADA Paratransit applications).
- Consent forms.

The Department will also ensure that LEP persons have meaningful access to all FTA Programs and activities. Whenever the Department holds a public hearing/meeting (whether during Environmental Assessment, Design, or service planning/monitoring), the legal notice regarding the hearing/meeting will indicate that LEP persons requiring documents be printed in an alternate language can contact a Department representative to communicate this need in a reasonable amount of time prior to the event. Additionally, legal notices shall inform LEP persons that a translator will be made available if the Department is notified sufficiently in advance of the hearing/meeting. Any departmental employee who needs translation services at any hearing may consult the Department's *Language Request List* to coordinate the services of another resource employee who may act as a translator, or contract out for translation services. Regarding federal-aid activities, commuter services (bus, rail, ferry service, airport, 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.

<u>Language Assistance</u>
The Department has a listing of firms that provide translation and interpretation services. See LEP Exhibit A. The Department also has a listing of employees that have stated that they are proficient in languages other than English. This resource can be used by CTDOT to assist LEP persons. See LEP Exhibit B.

In addition, the state's Department of Administrative Services has two organizations under contract to provide translation services. These firms have been identified earlier in this section.

Implementation Timeline

The Department has laid out a set of activities and has drafted a schedule for design and implementation of the various tasks and products committed to in the LAP. The calendar commitments are stated in the federal fiscal year calendar.

- Provide Written Notification of Language Assistance Services – Begin in Q4 2012
    - Research samples from other transit systems and/or develop a Connecticut-customized set of car cards, brochures, station postings, etc.
- Implement "I-Speak" Cards – Begin in Q4 2012
    - Research samples from the Census, other transit agencies, other public agencies, determine implementation plan and numbers needed, and arrange subsequent purchase.
- Develop an employee training curriculum including the following minimum topics for presentation – Q4 2012, Q1 2013

- The Department's responsibilities under LEP;
- Discussion of the Four-Factor Analysis, the characteristics of Connecticut customers/potential customers, and the employees' roles in monitoring and implementation;
- Orientation to the Department's LAP and the types of assistance that are available today.
- Customized training for various job types such as transit vehicle operators, phone agents, webmasters, ticket sellers, toad and office supervisors, etc.
- Various tools may be used in the training such as current versions of the FTA and FHWA PowerPoint shows on LEP, etc.

- Implement Training Program – Q1 2013
  - The plan is to initiate a training program for front-line employees covering Title VI, language assistance, and cultural sensitivity. The training will be delivered to bus operators, operations supervisors, etc.
  - The first round of training will be done as a free-standing training session. After the initial round of training, the LEP/Title VI curriculum will be integrated into both the new employee training and refresher training programs.
- Enhanced LEP Data Collection – Timelines vary for each activity.
  - Begin to collect data in all the Department's travel information centers for interactions with non-English callers. Information centers already have Spanish-speaking agents, but the additional data can be used to better match demand with personnel assignments. Begin in Q3 of 2012.
  - Review in detail the Census and ACS databases for languages that exceed the Safe Harbor Thresholds by transit service area and statewide. Begin Q4 2012.
    - Based upon initial review, determine areas or languages that require immediate attention for translation of vital documents.
    - Determine which areas or languages require further research in order to determine importance of transit and level of contact with transit programs. This could include contact with community-based organizations as will be detailed below in the internship item.
    - Gather a listing of resources that can be utilized for better and more direct outreach to the Safe Harbor populations and for translation services that may exceed the capabilities of existing services already under state contract.
  - Using the services of paid and unpaid interns, conduct an inventory of community-based organizations in the various service areas and administer surveys or initiate conversations with them to determine any language gaps. Begin in Q3 of 2012. This will be an ongoing task for three semesters. The Department has already begun the process of creating both paid and unpaid internships in cooperation with the regional campuses of the state university system. Targeted tasks for this group of interns will be more widespread than just LEP, but for the purposes of this section most of the proposed outreach tasks will be relevant.
  - Use data from the Department of Social Services to determine hot spots of non-English recipients of public services through the DSS. – Q4 of 2012
  - Utilize the resources of 211 InfoLine to collect information on language barriers of their callers. 211 InfoLine has a very good language assistance program since they are a major resource in delivering non-emergency information services to the state's population. The Department already has several projects in conjunction with 211 InfoLine that can be built on to collect additional information on language use by callers seeking transportation or other information. Begin in Q4 of 2012; ongoing activity throughout the period.

- Test the availability of language information from local school districts in the service area to see if the information on language use is available and in sufficient clarity and detail to be of use to project outreach staff. Begin in Q2 with data from new school year.
- Initiate a program for design and implantation of multi-lingual and non-language signs. Pending an enhancement to the list as more outreach is conducted, written materials will include, but not limited to:

    - Emergency transportation information in alternative languages and in pictogram formats based upon demand.
    - Markings, signs, and packaging for hazardous materials and substances.
    - Signs in bus and train stations, waiting rooms, reception areas, and other initial points of public entry.
    - Notices of public hearings regarding CTDOT's proposed transportation plans, projects, or changes, and reduction, denial, or termination of services or benefits.
    - Notices advising LEP persons of free language assistance and language identification cards for staff,
    - 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 (e.g., ADA Paratransit applications or the brochure for Right of Way acquisition/relocation).
    - Consent forms.

  To the extent possible, the Department will seek good examples of signage from other transit agencies or state DOTs. This activity will begin in Q4 of 2012.

  An inventory of potential locations and an inventory of signs of the types and numbers of signs needed for each location, and the languages needed for each location will be completed by Q1 of 2013. Purchase and installation will be complete by Q1 of 2013.

The Working Group will meet on a quarterly basis with the Department's Title VI Coordinator to report on the status to the LEP Implementation Plan.

The following table summarizes the actions and the implementation timeline. In the event it becomes necessary to make modifications to the implementation timelines based upon input from the Title VI Workgroup, a justification will be provided along with the revised calendar. timeline should be considered draft for the moment until the quarterly meetings of the working group take up the timeline. The group may revise dates as activities are prioritized.

	Connecticut Department of Transportation Target Start Date = " * " FY Quarter Estimated Completion Date – "x" FY Quarter Actual Completion Date = "✓" FY Quarter	**FFY12**	**FFY13**	**Contact/Lead**	**Status: Complete/In Progress/ or Ongoing**
A.	**LEP Activities**				
	Successful Activities to Continue:				
a-1	Continuing development of partnerships with community organizations that serve LEP populations; translation of notices, and multi-lingual websites.	**Q3** ✓		Public Trans.	**COMPLETE**
B.	**New Areas of Focus**				
	Language Assistance:				
b-1	Provide free language assistance for non-vital, yet important, outreach documents and in-person interpreter services for events where the public testimony is solicited.	**Q3** ✓		Public Trans.	**COMPLETE**
	Vital Documents:				
b-2	Determine which documents are vital for translation, and choose the formats to most effectively communicate the messages contained in those documents.	Q3 *	Q1 ~~Q2~~ x	Public Trans.	In Progress
	Definitions and Standards:				
b-3	Develop a method to ensure consistency in the application of competency standards for interpreters and translators.	**Q3** ✓		Public Trans.	**COMPLETE**
	Customer Information:				
b-4	Provide timely, relevant information about CDOT programs and services to LEP communities in the LEP languages.	**Q1** ✓		Public Trans.	**COMPLETE**
	Outreach:				
b-5	Conduct culturally-competent outreach to LEP communities to increase awareness and use of CTDOT services and programs.	**Q2** ✓		Public Trans.	**COMPLETE**
	Research and Administration:				

b-6	Develop a means to assess and monitor the effectiveness of CTDOT's LEP Plan internally and externally on two levels: 1. Ongoing review to immediately address any critical issues and make changes to the LEP Access Plan as needed. 2. Annual review to include any changes in demographics, types of service, or other LEP community needs.	Q4 *	Q1 ~~Q2~~ x	Public Trans.	In Progress
C.	**Enhanced Data Collection Tools**	Ongoing			
c-1	Collect daily alternative language experiences from employees, especially those with much routine contact such as drivers and telephone call center employees.	Q4 *	Q1 ~~Q2~~ x	Public Trans.	In Progress
c-2	Conduct an inventory of community-based organizations in the various service areas and administering surveys or initiating conversations with them to determine any language gaps and considering ways for those organizations to be a supplemental resource to the community.	**Q3** ✓		Contract Compliance	**COMPLETE**
c-3	Change internal procedures to allow the collection of data in real time by drivers, telephone agents and other employees.	Q4 *	Q1 ~~Q2~~ x	Public Trans.	In Progress
D.	**Implement "I-Speak" Cards**				
d-1	Research samples from the Census, other transit agencies, other public agencies, determine implementation plan and numbers needed, and arrange subsequent purchase.	**Q4** ✓		Contract Compliance	**COMPLETE**
E.	**Develop an employee training curriculum**				
F.	**Implement Training Program**				
f-1	To initiate a training program for front-line employees covering Title VI, language assistance, and cultural sensitivity. The training will be delivered to bus operators, operations supervisors, etc.	Q4 *	Q1 ~~Q2~~ x	Public Trans.	In Progress
f-2	The first round of training will be done as a free-standing training session. After the initial round of training, the LEP/Title VI curriculum will be integrated into both the new employee training and refresher training programs.		Q1 * Q2 x	Public Trans.	Ongoing

G.	**Enhance LEP Data Collection**				
g-1	Collect data in all the Department's travel information centers for interactions with non-English callers.	**Q3** ✓		Public Trans.	**COMPLETE**
g-2	Review in detail the Census and ACS databases for languages that exceed the Safe Harbor Thresholds by transit service area statewide.	**Q4** ✓		Public Trans.	**COMPLETE**
g-3	Determine areas or languages that require immediate attention for translation of vital documents. (This may include contact with community-based organization).	Q4 x		Public Trans.	In Progress
g-4	Gather listing of resources that can be utilized for better and more direct outreach to the Safe Harbor populations and for translation services that may exceed the capabilities of existing services already under state contract.	**Q4** ✓		Public Trans.	**COMPLETE**
g-5	Utilize paid and unpaid intern, conduct an inventory of community-based organizations in the various service areas and administer surveys or initiate conversations with them to determine any language gaps.	**Q3** ✓		Contract Compliance	**COMPLETE**
g-6	Use data from the Department of Social Services to determine hot spots of non-English recipients of public services through DSS.	**Q4** ✓		Contract Compliance	**COMPLETE**
g-7	Utilize the resources of 211 InfoLine to collect information on language barriers of their callers.	**Q4** ✓		Public Trans.	**COMPLETE**
g-8	Test the availability of language information from local school districts in the service area to see if the information on language use is available and sufficient clarity and detail to be of use to the project outreach staff.	**Q2** ✓		Public Trans.	**COMPLETE**
H.	**Provide Written Notification of Language Assistance Services**				
h-1	Research samples from other transit systems.	**Q4** ✓		Public Trans.	**COMPLETE**
h-2	Provide emergency transportation information in alternative languages and in pictogram formats based upon demand.	**Q4** ✓		Public Trans.	**COMPLETE**

h-3	Markings, signs, and packaging for hazardous materials and substances.	**Q4** ✓		Public Trans.	**COMPLETE**
h-4	Signs in bus and train stations, waiting rooms, reception areas, and other initial points of public entry.	**Q4** ✓		Public Trans.	**COMPLETE**
h-5	Notices of public hearings regarding CTDOT's proposed transportation plans, projects, or changes, and reduction, denial or termination of services or benefits.	**Q4** ✓		Public Trans.	**COMPLETE**
h-6	Notices advising LEP persons of free language assistance and language identification cards for staff.	**Q4** ✓		Public Trans.	**COMPLETE**
h-7	Provide 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.	~~Q4~~ x		Public Trans.	In Progress
h-9	Applications or instructions on how to participate in a recipient's program or activity or to receive recipient benefits or services.	**Q4** ✓		Public Trans.	**COMPLETE**
h-11	Complete inventory of potential locations and inventory of signs of the types and numbers of signs and the languages needed for each location.		Q1 x	Public Trans.	In Progress
h-12	Purchase and installation of signs.		Q4 x	Public Trans.	In Progress
I.	**Working Group**				
i-1	Working group will meet on a quarterly basis with the Department's Title VI Coordinator to report on the status to the LEP Implementation Plan.	**Q2** ✓		Public Trans./Contract Compliance	**COMPLETE**
J.	**Additional Language Assistance Services (provided by the Department)**	Ongoing			
j-3	Telephonic and video conferencing interpretation services.	Q4 *	Q2 x	Public Trans.	In Progress
j-4	Translating vital documents posted on Web Sites.	**Q4** ✓		Public Trans.	**COMPLETE**
j-5	Pooling resources and standardizing documents to reduce translating needs.	Q4 *	Q2 x	Public Trans.	In Progress

j-6	Using qualified translators and interpreters to ensure that documents provide accurate interpretations that do not cause delay or other costs.	**Q4** ✓		Public Trans.	**COMPLETE**
j-7	Centralizing interpreter and translator services to achieve economies of scale.	Q4 *	Q2 x	Public Trans.	In Progress
j-8	Formalized use of qualified community volunteers.	**Q4** ✓		Public Trans.	**COMPLETE**
j-9	Placing native language ads in publications serving alternative language populations to share current significant service related announcements.	**Q4** ✓		Public Trans.	**COMPLETE**
j-10	Continuing to develop partnerships with community organizations that serve LEP populations.	**Q4** ✓		Public Trans.	**COMPLETE**

LEP EXHIBIT A: Connecticut Department of Transportation
Limited English Proficiency (LEP) Reference Guide
Translation and Interpretation Services

Accuworld, LLC

Type of service:	Written Translation, Oral Interpretation
Service Area:	CT
Oral Hourly Rate:	69.99 – 149.00 (varies by county)
Written rate:	69.99 – 149.00 (by length of document)
Lead Time:	1 week notice/will do rush jobs
Contact Tel:	Susan E. Joyce
Contact Person:	860-561-3388
Website:	www.accuworld.com
Comments:	Mileage and travel fees may apply

Global Link Translations

Type of service:	Written Translation and Oral Interpretation
Service Area:	MA, CT
Oral hourly rate:	75.00 – 95.00 (varies)
Written rate:	.19-.25 per word
Lead Time:	Agency time allotted
Contact Person:	Katie Disanto or Jessica Ridley
Contact Tel:	413-737-1888
Website:	www.globallinktranslations.com
Comments:	Mileage and travel fees may apply

Interpreters and Translators, Inc.

Type of service:	Written Translation and Oral Interpretation
Service Area:	CT (Nationwide)
Oral hourly rate:	75.00 - 90.00 (varies) (2 hr. min.)
Written rate:	.22-.35 per word or a $75.00 per project fee
Lead Time:	Upon agency needs
Contact Person:	Debra Mills/Dagny Mofid itict@ititranslates.com
Contact Tel:	860-647-0686
Website:	www.ititranslates.com
Comments:	Accessibility to calendar for advance scheduling or online secure portal available

Language Link Consortium

Type of service:	Written Translation and Oral Interpretation
Service Area:	CT, NY, MA
Oral hourly rate:	90.00 per hour (2 hr. min.)
Written rate:	90.00 per one-sided pg with 100 word count max. (4 hr. min.)
Lead Time:	1 day notice/3 day for specialty languages
Contact Person:	Hilda Santana
Contact Tel:	860-805-2010

Website: n/a
Comments: Travel charges may apply depending on location

Northwest Interpreters, Inc.

Type of service: Written Translation and Oral Interpretation

Service Area: CT (Nationwide)
Oral hourly rate: 65.00-90.00 per hour (2 hr. min.)
Written rate: .18-.30 per word or a $65.00 per project fee
Lead Time: Agency time allotted
Contact Person: Vic Marcus
Contact Tel: 360-566-0453 x305
Website: www.nwiservices.com
Comments: Mileage fees may apply/.55 per mile

RDP Agency LLC

Type of service: Written Translation and Oral Interpretation

Service Area: CT, Western MA, FL
Oral hourly rate: 80.00 - 90.00 (2 hr. min.)
Written rate: .18-.20 per word
Lead Time: Depends on need for project
Contact Person: Jaime Lee
Contact Tel: 860-881-8181
Website: www.rdptranslation.com
Comments: No travel or mileage fees

Language Learning Enterprises, Inc. (LLE)

Type of service: Written Translation and Oral Interpretation (telephone only)

Service Area: CT (Nationwide)
Oral hourly rate: 1.15 per minute (across the board)
Written rate: .18-.23 per word (estimate given in advance)
Lead Time: 3-5 business days
Contact Person: Isabelle Dejean/Telephone Interpretation
Contact Tel: 888-464-8553 ext. 223
Website: www.lle-inc.com
Comments: No travel fees

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
Prospere 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	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			
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	
Tiffany Velasco	Spanish		X			NP-3
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

LEP Exhibit C: Spanish Media Contact List

uarrigoitia@entravision.com; ssuarez@entravision.com; rbarbour@entravision.com; 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/

Section VI - Notifying Beneficiaries of Protection under Title VI

(A signed copy of the Title VI Policy Statement, Title VI Brochure and a copy of the Title VI Signs are included in the "Attachments"):

Section VI-1	Title VI Policy Statement
Section VI-2	Title VI Brochure
Section VI-3	Title VI Signs (Spanish)
Section VI-4	Title VI Signs (English)

Notifying Beneficiaries of Protection under Title VI

The Department operates its programs and activities without regard to race, color and national origin. The Department provides notification to beneficiaries of their rights under Title VI and the procedures to follow when filing a Title VI complaint. The Department disseminates this information on the Department's website, and through postings in public waiting areas, buses and rail stations; and other areas that are easily accessible to the public. This information is also made available to the public at public meetings and hearings.

To access the Title VI information on the Department's website go to www.ct.gov/dot Civil Rights and Accessibility" then to the "Title VI Program". The Department's Title VI webpage includes the following documents:

Connecticut Department of Transportation Title VI Policy Statement – This policy states that the Department prohibits discrimination on the basis or race, color or national origin in its programs, benefits and activities. Information identifying who has been delegated the responsibility for the implementing and monitoring the Department's Title VI program is also provided in the Policy Statement. This document is signed by the Commissioner.

Title VI Brochure – The Brochure provides an overview of Title VI and the Department's responsibilities under Title VI. The brochure also spells out the protections under Title VI and describes how to file a discrimination complaint.

Notifying Beneficiaries of Protection Under Title VI – This document states that Department's commitment and responsibility to prohibit discrimination on the basis of race, color and national origin in its programs, activities, services and benefits under Title VI. The document also provides information on how to request additional about the Department's obligations under Title VI and how to file a discrimination complaint.

The Title VI Discrimination Complaint Form – A complaint form has been developed to assist beneficiaries when filing Title VI complaints.

The Department has also developed a posting "Your Rights Under Title VI". This posting is posted in areas easily accessible and visible to the public; rail stations, platforms, buses and public waiting areas.

Your Rights Under Title VI of the Civil Rights Act of 1964 – This posting states the Department's commitment to prohibit discrimination on the basis of race, color and national origin in its programs, activities, services, and benefits. The posting also includes information on where find more information about Title VI and where to file discrimination complaints.

Connecticut Department of Transportation

TITLE VI DISCRIMINATION COMPLAINT FORM

Complainants Name: _____

Street Address: _____

City/State/Zip: _____

Phone: _____

Were you discrimination against because of: __Race/__Color/__National Origin/ __Creed(FAA only)/__Other

Date of the Incident: _____

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 clearly as possible what happened and how you were discriminated against. If more space is needed please use the back of the form.

_____

_____

_____

_____

_____

_____

_____

_____

Have you filed this complaint with any other federal, state, or local agency, or with any federal or state court? ___Yes ____No

If yes, check all that apply:
___Federal Agency ___Federal court ___State Agency ___State Court ___Local Agency

Please provide information about a contact person at the agency/court where the complaint was filed.

Name_____

Address_____

City, State and Zip Code_____

Telephone Number_____

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

Signature: Date:

Submit your complaint to:

Connecticut Department of Transportation
Attention: Debra Goss
2800 Berlin Turnpike
Newington, CT 06131

(If you wish to file your complaint directly with the federal transportation agency, please contact this office for information).

YOUR RIGHTS UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

THE CONNECTICUT DEPARTMENT OF TRANSPORTATION PROHIBITS DISCRIMINATION IN ITS PROGRAMS AND ACTIVITIES

Title VI of the Civil Rights Act of 1964, prohibits discrimination on the basis of race, color, or national origin in programs, activities and services receiving federal financial assistance (42 U.S.C. Section 2000d).

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, may file a discrimination complaint. To obtain additional information about the Department's Title VI Program or Title VI Complaint process, please go to the Department's website at www.ct.gov/dot under "Civil Rights and Accessibility".

Submit inquiries or complaints to:

Title VI Coordinator
Connecticut Department of Transportation
2800 Berlin Turnpike, Newington, CT 06131-7546

Complaints may also be filed directly with the Federal Transit Administration:

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

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

Online Notice to Beneficiaries

The Connecticut Department of Transportation (CTDOT) 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, or national origin.

CTDOT 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 CTDOT programs and activities.

Any person who believes that he or she has been subjected to discrimination or retaliation based on their race, color or national origin may file a Title VI complaint. Complaints may be filed directly to CTDOT 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 with 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 CTDOT's non-discrimination obligations or to file a Title VI complaint, please submit your request or complaint in writing to:

Connecticut Department of Transportation
Attention: Debra Goss, Title VI Coordinator
2800 Berlin Turnpike
Newington, Connecticut 06111.

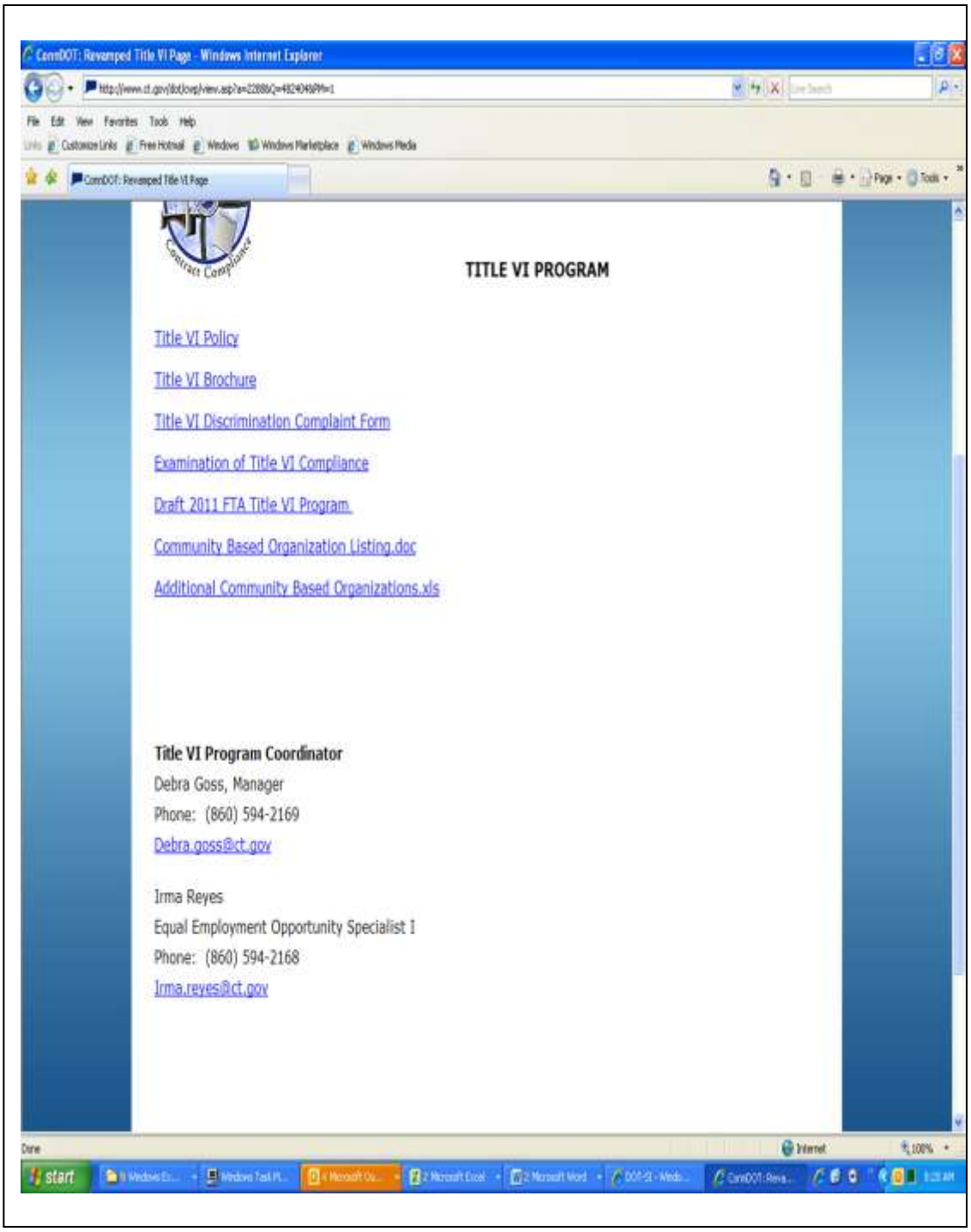
Complaint forms can be obtained online at the CTDOT website www.ct.gov/dot

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

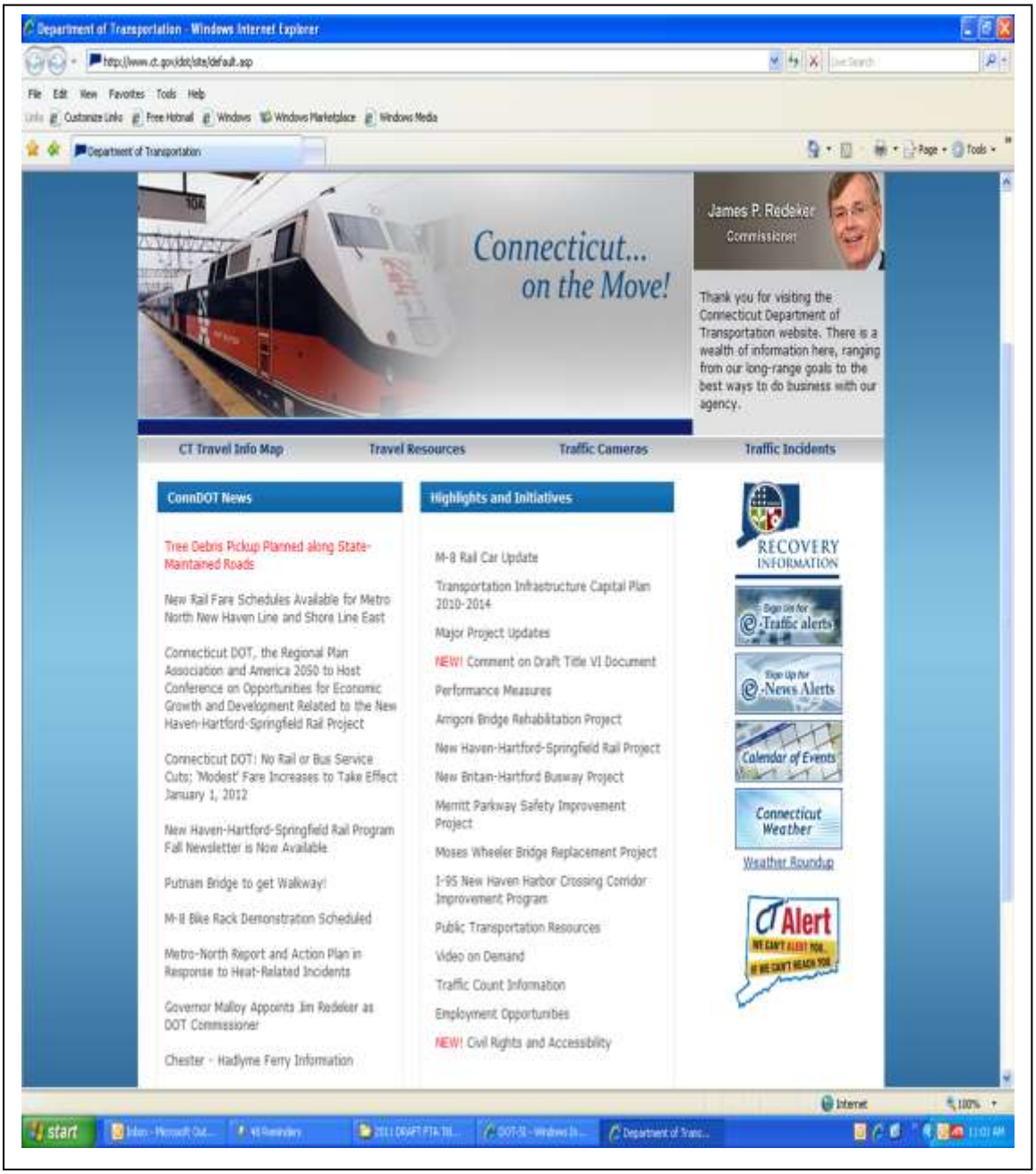
Federal Highway Administration (FHWA) Title VI complaints may be filed directly to:
Investigations & Adjudication Team Director
FHWA Office of Civil Rights
1200 New Jersey Avenue, SE, Suite E-81
Washington, DC 20590

Federal Aviation Administration (FTA) complaints may be filed directly to:
Nancy Cibic, AGL-9
FAA Great Lakes Regional Office
2300 E. Devon Avenue, Room 440
Des Plaines, IL 60018

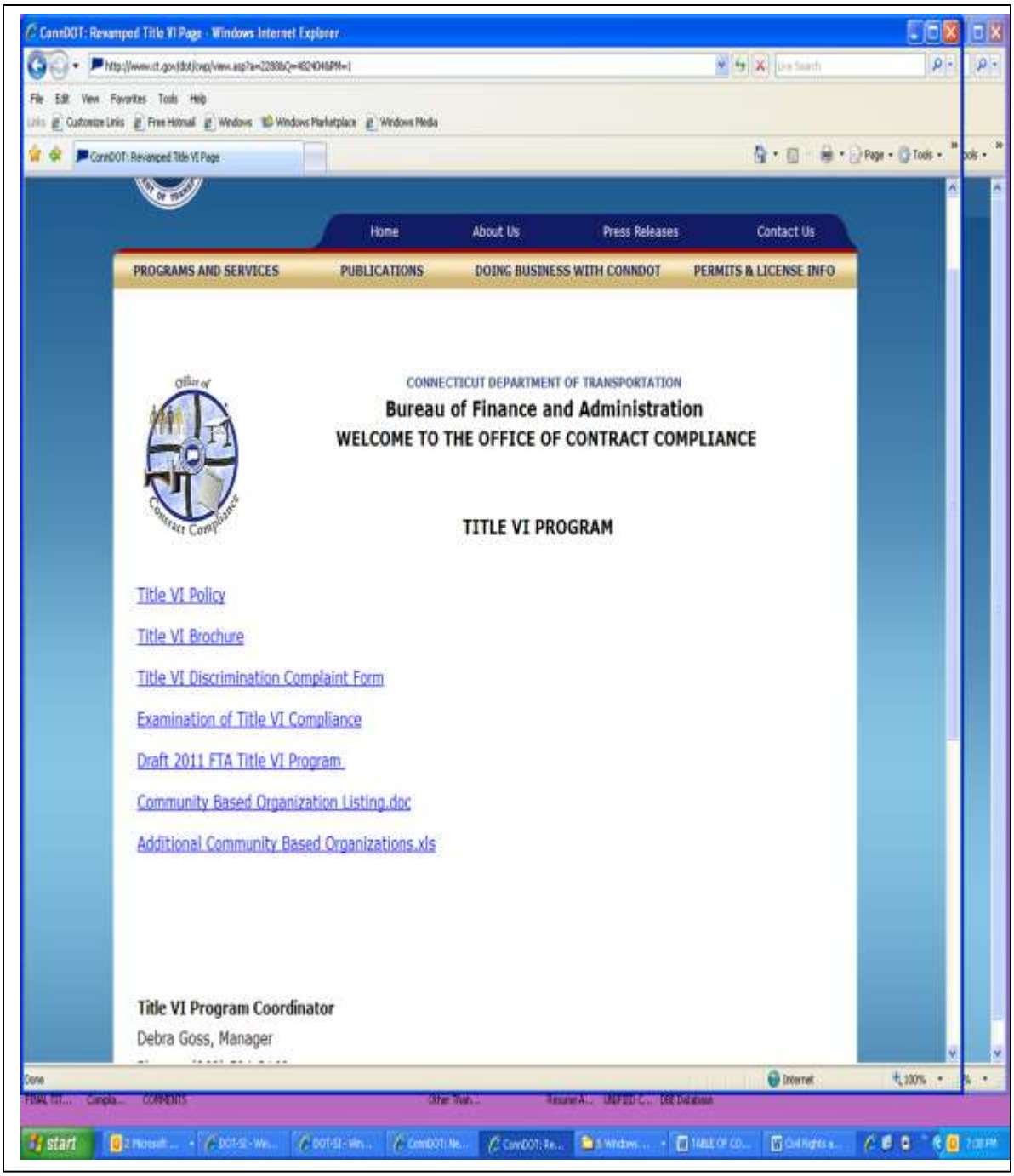
Internet Title VI Program Contact Information



Internet Front Page - Civil Rights and Accessibility



Internet Title VI Program Front Page



Section VII - Pending Applications for Financial Assistance

Federal Transit Administration

Capital Program Administration and Grants Management Overview

CTDOT is the designated recipient for all Federal Transit Administration (FTA) programs.
The governor designated CTDOT as the agency responsible for administering the Sections 5307, 5309, 5310, 5311, 5316 and 5317 programs.

CTDOT is responsible for the day to day management of Federal grants and of grant supported activities to ensure compliance with applicable Federal requirements. This includes the administration and management of the grant in compliance with the Federal regulations, Grant Agreement, and applicable FTA circulars.

The Active Grant list is a list of all open grants in the FTA TEAM system for which CTDOT has been awarded funding. This list represents all open grants as of February 2, 2012. Depending on the program category, CTDOT is required to report progress and financial information either quarterly or annually.

FTA ACTIVE GRANTS REPORTING SCHEDULE AND ASSIGNMENTS

Bus/Rail	Grant No.	Description	Funding Source	Submission (Quarterly/Annual)
Bus	CT-03-0109	Construct New Haven Bus Garage	Section 5309	Quarterly
Bus	CT-03-0111	New Bus Facility Waterbury	Section 5309	Quarterly
Rail	CT-03-0119®	Feasibility Study Danbury To Norwalk	Section 5309	Quarterly
Rail	CT-03-0120®	8 Projects for CTDOT's FY 2002 POP	Section 5309	Quarterly
Bus	CT-03-0123	New Pedestrian Bridge at New London RR	Section 5309	Quarterly
Rail	CT-03-0124®	FY 2003 POP with 4 Projects - Rails	Section 5309	Quarterly
Rail	CT-03-0126®	FY 2004 Program of Projects w/5 Projects	Section 5309	Quarterly
Rail	CT-03-0134®	FY 2005 Program of Projects - Rails	Section 5309	Quarterly
Rail	CT-03-0140®	FY 2005 Program of Projects - Rails	Section 5309	Quarterly
Bus	CT-03-0145	Waterbury Bus Maintenance Facility	Section 5309	Quarterly
Rail	CT-03-0146®	Orange Intermodal Fac - Environmental As	Section 5309	Quarterly
Bus	CT-03-0149	New Britain/Hartford Busway	Section 5309	Quarterly
Bus	CT-04-0005	New Britain - Hartford Busway	Section 5309	Quarterly
Bus	CT-04-0009	Waterbury Bus Maintenance Facility	Section 5309	Quarterly
Bus	CT-04-0012	NW Transit Bus Maint & Storage Facility **(Engineering and Design not Construction)**	Section 5309	Quarterly
Bus	CT-04-0017	NW Bus Maintenance Facility **(Engineering and Design - Not Construction)**	Section 5309	Quarterly
Bus	CT-04-0018	New London Interm Ctr Streetscape	Section 5309	Quarterly
Bus	CT-04-0021	New Britain/Hartford Busway	Section 5309	Quarterly
Bus	CT-04-0022	Waterbury Bus Facility Earmark	Section 5309	Quarterly
Bus	CT-04-0023	Northwestern CTTD Bus Facility Earmark	Section 5309	Quarterly
Bus	CT-04-0024	Bridgeport Rail Station Improvement	Section 5309	Quarterly
Bus	CT-04-0031	Northwestern CTTD Bus Facility Earmark	Section 5309	Quarterly
Bus	CT-04-0032	Waterbury Bus Admin/Maint Fac FY 09 Earmark	Section 5309	Quarterly
Rail	CT-05-0104®	Cat C1b Repl; FF Sta; NHY Fuel Facility	Section 5309	Quarterly
Rail	CT-05-0105®	New Haven Line Fixed Guideway Modernizat **East Bridgeport Rail Yard** **NH Yard Component Change Shop** **NH Station PA & VA Message Signs** **Replace NHL Substations** **New Canaan Bulk Track Storage**	Section 5309	Quarterly
Bus	CT-05-0106	New Britain/Hartford Busway	Section 5309	Quarterly
Rail	CT-05-0107	Loc Ovrhl: Danbury CTC; Sound Bch and Tomac	section 5309	Quarterly
Bus	CT-05-0106	New Britain/Hartford Busway	Section 5309	Quarterly
Bus	CT-15-X001	New Britain - Hartford Busway	Section 5309	Quarterly
Bus	CT-16-0033	Section 5310 Program FY 2007	Section 5310	Annual
Bus	CT-16-0034	Section 5310 Program FFY 2008	Section 5310	Annual
Bus	CT-16-0035	FFY 2009 Section 5310	Section 5310	Annual
Bus	CT-16-0036	Section 5310 Program FFY 2010	Section 5310	Annual
Bus	CT-16-0037	Section 5310 Program FFY 2011	Section 5310	Annual
Bus	CT-18-X026	Asset Transfer Administrative Amendment	Section 5311	Annual
Bus	CT-18-X027	Rural POP: Ops, Vehicles, Equip & Plng	Section 5311	Annual

Bus	CT-18-X028	Section 5311 Program of Projects	Section 5311	Annual
Bus	CT-18-X029	Section 5311 Program FFY 2006	Section 5311	Annual
Bus	CT-18-X030	Section 5311 Program FFY 2006	Section 5311	Annual
Bus	CT-18-X031	Rural Operating Assistance	Section 5311	Annual
Bus	CT-18-X032	FFY 2009 Section 5311	Section 5311	Annual
Bus	CT-26-0006	United We Ride	Section 5314	Annual
Bus	CT-37-X004	Job Access and Reverse Commute FFY 2003	Section 5316	Quarterly
Bus	CT-37-X005	JARC FFY 2004	Section 5316	Quarterly
Bus	CT-37-X006	Job Access and Reverse Commute FY 05	Section 5316	Quarterly
Bus	CT-37-X008	FY 2007 JARC	Section 5316	Quarterly
Bus	CT-37-X009	JARC FFYÆ08 and FFYæ09	Section 5316	Quarterly
Bus	CT-55-0001	Development of Fuel Cell Buses	Section 5309	Quarterly
Bus	CT-57-X001	New Freedom Initiative FY '06	Section 5317	Quarterly
Bus	CT-57-X002	FY 2007 New Freedom (Lapsing Funds)	Section 5317	Quarterly
Bus	CT-57-X003	FY 2008 New Freedom Program	Section 5317	Quarterly
Bus	CT-57-X004	FY 2009 New Freedom Program	Section 5317	Quarterly
Bus	CT-58-0001	Purchase 4 40-ft Hybrid Replacement Buses	Section 5308	Quarterly
Bus	CT-70-X002	Norwich Transportation Center	Section 5307	Quarterly
Bus	CT-77-X001	Stationary Fuel Cells & Hybrid Buses	ARRA Grants	Quarterly
Bus	CT-80-X013 (P&P)	Metropolitan and Statewide Planning	Section 5305	Annual
Bus	CT-80-X014 (P&P)	Statewide Transit Planning	Section 5305	Annual
Bus	CT-86-X001	Vehicles, Facility Improvements, Shelters	ARRA Grants	Quarterly
Rail	CT-90-X300®	CTC SIGNAL 7 OPERATING ASST	Section 5307	Quarterly
Bus	CT-90-X324	Waterbury Bus Facility, PE/Dsgn, Land Acq.	Section 5307	Quarterly
Rail	CT-90-X378®	FFY 2002 Section 5307 Program of Projects	Section 5307	Quarterly
Bus	CT-90-X384	FFY 2002 Section 5307 Program of Projects	Section 5307	Quarterly
Bus	CT-90-X391	FY 2003 Program of Projects (6 Projects)	Section 5307	Quarterly
Rail	CT-90-X393®	FY 2003 Section 5307 POP 5 Rail Projects	Section 5307	Quarterly
Rail	CT-90-X404®	FY 2004 Program of Projects - Reg 2	Section 5307	Quarterly
Bus	CT-90-X405	FY 2004 Section 5307 POP (8 Projects)	Section 5307	Quarterly
Bus	CT-90-X421	FY 2006 Program of Projects - Bus	Section 5307	Quarterly
Bus	CT-90-X431	FFY 2006/2007 Bus POP - Amend	Section 5307	Quarterly
Rail	CT-90-X501®	Section 5307 POP, Pre-SAFETEA-LU	Section 5307	Quarterly
Rail	CT-90-X507®	FY 2010 POP	Section 5307	Quarterly
Bus	CT-90-X510	FY 2011 POP (Bus & Rail)	Section 5307	Quarterly
Bus	CT-95-X001	New Britain/Hartford Busway	Section 5307	Quarterly
Bus	CT-95-X008	Purchase 4 60 ft. Hybrid Repl Buses	Section 5307	Quarterly
Bus	CT-95-X010	Waterbury Evening Bus Service	Section 5307	Quarterly
Bus	CT-96-X003	Statewide Vehicles (136)/P&R Lot Improvs	ARRA Grants	Quarterly
Rail	CT-96-X004®	Region 2 ARRA POP	ARRA Grants	Quarterly

Section VIII - Analysis of Construction Projects

Environmental Overview

The type of environmental documentation required is determined in accordance with the *National Environmental Policy Act* (NEPA) and the *Connecticut Environmental Policy Act* (CEPA).

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.

During the preliminary stages, each proposed transportation project undergoes an internal environmental review process to determine the type of environmental documentation required for the project. This decision is determined by the funding source and the level of potential impact to the environment as a result of the project. If a project is being funded in whole or in part with federal monies, or if the project requires a federal permit, one of three levels of environmental documentation must be prepared under NEPA. The environmental review process determines if a project shall require a 1) Federal Environmental Impact Statement (EIS), 2) Categorical Exclusion (CE), or 3) Federal Environmental Assessment (EA). It should be noted that a Federal EA is a decision making tool to determine if a project warrants a Finding of No Significant Impact (FONSI), or if an EIS should be prepared. If the project is state-funded only, criteria set forth in the Department's Environmental Classification Document (ECD) will determine whether or not a State Environmental Impact Evaluation (EIE) shall be prepared under CEPA. For projects that are funded with both federal and state funds, a single environmental document (e.g., EIS/EIE or EA/EIE) is prepared that addresses both NEPA and CEPA requirements.

FTA Construction Projects Listing

Bus/Rail	Grant No.	Description	Funding Source	Submission (Quarterly/ Annual)	Doc. Type / date of approval	Project #
Bus	CT-03-0109	Construct New Haven Bus Garage	Section 5309	Quarterly	EA 1/26/2000	402-002
Bus	CT-03-0111	New Bus Facility Waterbury	Section 5309	Quarterly	EA 1999	431-006
Bus	CT-03-0123	New Pedestrian Bridge at New London RR	Section 5309	Quarterly	CE - 7/18/2002	
Bus	CT-03-0145	Waterbury Bus Maintenance Facility	Section 5309	Quarterly	EA 1999	431-006
Rail	CT-03-0146®	Orange Intermodal Fac - Environmental As	Section 5309	Quarterly	EA being prepared	106-120
Bus	CT-03-0149	New Britain/Hartford Busway	Section 5309	Quarterly	EIS 3/21/2002	170-305
Bus	CT-04-0005	New Britain - Hartford Busway	Section 5309	Quarterly	EIS 3/21/2002	170-305
Bus	CT-04-0009	Waterbury Bus Maintenance Facility	Section 5309	Quarterly	EA 1999	431-006
Bus	CT-04-0018	New London Interm Ctr Streetscape	Section 5309	Quarterly	CE (No date)	
Bus	CT-04-0021	New Britain/Hartford Busway	Section 5309	Quarterly	EIS 3/21/2002	170-305
Bus	CT-04-0022	Waterbury Bus Facility Earmark	Section 5309	Quarterly	EA 1999	431-006
Bus	CT-04-0023	Northwestern CTTD Bus Facility Earmark	Section 5309	Quarterly	CE	
Bus	CT-04-0024	Bridgeport Rail Station Improvement	Section 5309	Quarterly	FONSI - 8/19/2003	
Bus	CT-04-0031	Northwestern CTTD Bus Facility Earmark	Section 5309	Quarterly	CE	
Bus	CT-04-0032	Waterbury Bus Admin/Maint Fac FY 09 Earmark	Section 5309	Quarterly	EA 1999	431-006
Rail	CT-05-0104®	Cat C1b Repl; FF Sta; NHY Fuel Facility	Section 5309	Quarterly	Cat C1b - CE 6/29/2006 FF Station - FONSI 3/7/2008 NHY - CE 1/22/2008	NHY-301-97
Rail	CT-05-0105®	New Haven Line Fixed Guideway Modernizat **East Bridgeport Rail Yard** **NH Yard Component Change Shop** **NH Station PA & VA Message Signs** **Replace NHL Substations** **New Canaan Bulk Track Storage**	Section 5309	Quarterly	**EBRY - CE 8/4/2009** **NHY - FONSI 5/7/209** **NHSPA- CE 12/2/2009** **NHL Substations - CE** **NCBTS - 5/5/2010**	
Bus	CT-05-0106	New Britain/Hartford Busway	Section 5309	Quarterly	EIS 3/21/2002	170-305

Bus	CT-05-0106	New Britain/Hartford Busway	Section 5309	Quarterly	EIS 3/21/2002	170-305
Bus	CT-15-X001	New Britain - Hartford Busway	Section 5309	Quarterly	EIS 3/21/2002	170-305
Bus	CT-70-X002	Norwich Transportation Center	Section 5307	Quarterly	EA with a separate Title VI assessment	103-238
Bus	CT-90-X324	Waterbury Bus Facility, PE/Dsgn, Land Acq.	Section 5307	Quarterly	EA 1999	431-006
Bus	CT-95-X001	New Britain/Hartford Busway	Section 5307	Quarterly	EIS 3/21/2002	170-305

Section IX – Bus System-Wide Service Standards and Policies

SERVICE GUIDELINES

January 2012

Planning & Scheduling Department

100 Leibert Road
Hartford, CT 06120

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 is covered with public funding, CTTRANSIT has an obligation to operate to the maximum public benefit in the most efficient manner that is practical. 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. And as a publicly funded service, CTTRANSIT must also comply with all applicable federal and state laws, regulations and other guidance. This includes all applicable guidance regarding Title VI of the Civil Rights Act of 1964, as amended (referred to as Title VI), and related statutes and regulations.

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 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 connections 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 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 CTDOT and are either state-owned facilities or leased by CTDOT 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 CTTRANSIT 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, impedance 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 that 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

$$\frac{Tb}{Ta} = < 2.0$$

Tb Point to Point Travel Time by Bus
Ta Point to Point Travel Time by Private Auto

Figure 2

Coefficient of Directness for Express Routes

$$\frac{Tb}{Ta} = < 1.33$$

Tb Point to Point Travel Time by Bus
Ta 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	Before 8:59AM
	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

$$Ro + L + Ri = C$$

Ro Running Time (Outbound)
Ri 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 provide 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

$$\frac{34 \text{ (running time)}}{20 \text{ (headway)}} = 1.7 \text{ (buses)}$$

2 (buses) x 20 (headway) = 40 (cycle time)

40 (cycle time) - 34 (running time) = 6 (recovery time)

Headway: 15 Minutes

$$\frac{34 \text{ (running time)}}{15 \text{ (headway)}} = 2.27 \text{ (buses)}$$

3 (buses) x 15 (headway) = 45 (cycle time)

45 (cycle time) - 34 (running time) = 11 (recovery time)

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 All Other Service Periods	30 Minutes 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.

CTTRANSIT 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 CTTRANSIT's on-going ride-checking 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)

$$\frac{P}{H} = PpH$$

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 CTDOT 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 CTDOT. 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 CTDOT.

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 CTTRANSIT 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 CTTRANSIT 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 CTTRANSIT'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 an appendix to the COA 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 ride-check 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 in the report. 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 ride-checks 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.

Subsection five ties together the data collected in subsections one through four and compares this body of data to CTTRANSIT'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 CTTRANSIT'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 an appendix to the COA 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 CTTRANSIT division and changes that require formal approval by CTDOT.

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 continue 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 CTTRANSIT. 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	• 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	• 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	• 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	• 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	• Minimizes sight problems for other vehicles and pedestrians • Less pedestrian congestion in passenger waiting areas	• 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. CTDOT 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 CTTRANSIT 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. CTTRANSIT 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	• Easy access for bus operators • Minimal service delay • Simple, inexpensive design • Easy to establish or relocate	• 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	• 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	• 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 CTTRANSIT'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 CTTRANSIT 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 CTDOT 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 with 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 CTTRANSIT'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.

CT TRANSIT
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 CTDOT appointed by the Transit and Ridesharing Administrator. Other CTTRANSIT and CTDOT staff (e.g., Transportation Planners, Schedulemakers, 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 CTDOT.

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 CTDOT 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 CTDOT:

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 CTDOT 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 Shore Line East (SLE) commuter rail service.

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
- Connections with other transit systems and transportation modes, including Commuter Connection services at rail stations that feed or distribute customers to off-system locations.
- Responsive customer service
- Convenient scheduling
- Affordable pricing
- 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
- Equitable distribution of publicly-funded transit resources throughout the community

Service improvements 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 for areas of the system such as branch lines where the return on investment in transit service is less than desirable, but the connectivity to the mainline system is important to individual mobility and overall economic development.

Rail services will also designed, planned and operated in a way that does not discriminate on the basis of race, color or national origin. The Department is 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, rail service 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 meaningful access to programs and activities by persons with limited proficiency in English.

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 follow. Additional detail on Evaluation of Service and Fare Changes can be found in Section XI. Additional information and analysis of the distribution of services in an equitable fashion can be found in Section XIII.

Vehicle Load

The vehicle loading standard for maximum recommended occupancy for lengthening trains is as follows:

Lengthening Trains	
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:

Vehicle Headways
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 "Outer New Haven" vehicle headways 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) also required certain design changes to rail cars and stations that have both improved accessibility to people with disabilities and 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

(The "CONNECTICUT DEPARTMENT OF TRANSPORTATION TITLE VI FARE AND SERVICE EQUITY ANALYSIS: CTTRANSIT, New Haven Line and Shore Line East State Fiscal Year 2012 Fare Increase and Service Reduction Planning Process" is included in the "Attachments"):

Section XI-1 CONNECTICUT DEPARTMENT OF TRANSPORTATION TITLE VI FARE AND SERVICE EQUITY ANALYSIS: CTTRANSIT, New Haven Line and Shore Line East State Fiscal Year 2012 Fare Increase and Service Reduction Planning Process

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 evaluates 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. This analysis is performed in accordance with the requirements of FTA Circular 4702.1A, Chapter V. The Department follows Option A of this chapter of the Guidance to analyze and assess proposed changes.

Major service changes 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. The Department will also assess the effects of the proposed service change on minority and low–income populations.

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) and ways to minimize, mitigate, or offset any adverse effects
- Particular attention is paid to the assessment of the impact of the change on Title VI and environmental justice populations and ways to minimize, mitigate, or offset any adverse effects
- For service reductions, availability of alternative routes, alternate modes of transit and comparisons of travel time, cost and convenience of the current route in comparison with the alternatives is analyzed
- Estimated budget impact
- Any other relevant information or comments.

As part of the implementation of any service change, a communications plan is developed for outreach to impacted customers. Particular attention is given to assuring outreach to minority, low-income and LEP populations. Materials and other service change publicity both on-vehicle and through media outlets or other communications are made available in other languages, as appropriate.

All proposed service changes must be approved by the Department before implementation. A full service change equity analysis is prepared as a part of any service change proposal package submitted to the Department that meets the threshold as a major service change.

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 impacts on low-income and minority 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, or a complete elimination of a route or a branch that significantly affects span of service;

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 readily available on existing duplicative service provided by CTTransit or another transit provider or by convenient 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 is performed as part of the process. The results of the public hearings are documented and modifications are made to the fare proposals based upon 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 of fare. 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. Alternative transit services and their fare cost as well as alternative methods of fare payment (ex., one-way fare versus multi-ride fare) are also analyzed to assess impacts on the various rider groups of the various fare payment options. 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. Hearings are scheduled to be held during the hours of transit service in all affected service areas. All hearings are held at accessible hearing sites. 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 the overall impact of the fare increase on the budget and on riders as well as whether final fare adjustments will have disparate effects on differing population groups. A final fare change equity analysis is part of each fare change proposal package.

Equity Analysis of Proposed 2011 Service Reductions and Fare Increases

The most recent analysis of the equity of proposed service reductions and fare increases was done in connection with proposed service reductions and fare increases in 2011. The process of analyzing the equity of the proposals began at the very initial stages of budget planning. Equity issues were weighed as a final proposal was developed for public review. Changes to the proposals were made after public review and comment in order to mitigate the impacts of the proposals on Title VI populations.

Ultimately, a fare increase was implemented on bus and rail on January 1, 2012. No service reductions were made at that time. It was concluded that the alternatives to a fare increase, such as the cutbacks in service as proposed in the public hearings, would have had a more severe adverse impact on all riders, but especially Title VI populations who utilize the bus system. As a result of the analysis, the final package demonstrated equity between the rail and bus modes and between local and express bus modes, and addressed any issues of disparate treatment.

The report "CONNECTICUT DEPARTMENT OF TRANSPORTATION TITLE VI FARE AND SERVICE EQUITY ANALYSIS: CTTRANSIT, New Haven Line and Shore Line East State Fiscal Year 2012 Fare Increase and Service Reduction Planning Process" is attached as Section XI-1.

Equity Analysis of New Britain-Hartford Bus Rapid Transit Project

The Department will be conducting a full Service and Fare Equity Analysis for the busway project in accordance with the applicable federal Guidance as the service plans and fares are finalized closer to opening day and as the fare structure evolves for the whole regional transit system. This Service and Fare Equity Analysis will be wholly compliant with the applicable FTA Guidance.

The Department is currently estimating that the service plan will be finalized twelve months before opening day and proposes to submit the service and fare equity analysis six months before opening day. With a current opening day of November 14, 2014, the current forecasted submittal date for the Equity Analysis would be May 14, 2014. The Department feels that is sufficient time to assure that the final service and fare designs and policies assure the equitable distribution of benefits and impacts. If mitigations are required in the service or fare policies of the system, this also allows sufficient time to that any such mitigations can be implemented before the system begins operation.

Prior Analysis - A detailed service and fare equity analysis in accordance with the federal guidance has not been previously performed for the busway project. The Department did conduct an initial analysis of the Draft Service Plan and the initial proposed fare policies, and the impacts of those plans and policies, at an appropriate level for a project at this stage of implementation and consistent with analyses performed for other New Starts projects.

The framework for this review utilized the data available at this stage of project development, determined the impacts on Title VI and LEP populations of the plan as it exists now, and made an initial determination that there were no disparate impacts that needed to be mitigated at this time.

A number of Title VI and LEP populations are impacted along the corridor of the project. The impacts are fully discussed in the Final EIS and in subsequent New Starts reporting. As stated in these analyses, there is significant positive benefit to the targeted communities as a result of this project being built and the busway system of services being implemented.

The following excerpt from the document "The Case for the Project" submitted as part of the most recent New Starts annual report validates the relatively even distribution of benefits of the bus services aspect of the project.

> *The busway will save new and existing transit riders some 4,840 hours of travel time per day. These savings are well distributed throughout the corridor: 47 percent of these time savings accrue to suburban residents, 30 percent to Hartford residents, and 23 percent to New Britain residents. The same broad distribution of benefits is evident by level of car ownership. Households without cars receive 33 percent of the travel time savings, households with only one car receive 27 percent, and multi-car households receive 40 percent.*

These benefits accrue due to several factors including the increased frequency of service on local, feeder and express bus services serving the wide range of geography and populations in the project service area, the increased daily span of service due to the expansion into late night and weekend services, and the addition of more one-seat rides to employment, educational and commercial destinations.

The policy on fares for the busway services will be identical to the fares for the underlying system. Local bus fares will be the same for busway services and ongoing local transit services. Longer distance express services will have distance-based fares as they do now on the existing system. Therefore there will be no differentiation of fares on the busway services that would create a disparate impact for Title VI communities as there might be on a bus system that is adding a new rail line with differential fares by mode.

Since the user benefits of the system are distributed so evenly, and the fares are consistent with the current fare structure, this initial scan of service and fare equity concluded that there is no disparate impact that needs to be addressed at this time.

Section XII – Demographic and Service Profile Maps and Charts

(The Profile Maps and Charts are included in the "Appendices"):

Section XII-1	Minority Map for Bus Service Area (New Haven)
Section XII-2	Minority Map for Rail Service Area (New Haven)
Section XII-3	Poverty Map for Bus Service Area (Hartford)
Section XII-4	Poverty Map for Bus Service (New Haven)
Section XII-5	Poverty Map for Rail Service Area (New Haven)
Section XII-6	LEP Bus Service Area (Hartford)
Section XII-7	LEP Bus Service Area (New Haven)
Section XII-8	LEP Rail Service Area (New Haven)
Section XII-9	Minority Map for Bus Service Area (Hartford)

Demographics and Mapping

A series of maps has been 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 VI impacts and project concerns.

Data and Sources Used

To develop the base layers used within the Title VI mapping, several sets of data were retrieved from the 2010 US Census, from the 2005-2009 American Community Survey, 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 with their source below:

Figure 2a – Title VI Data and Source

Data	Source
Rail Information	
Passenger Rail System Network	GIS Development
Rail Stations	GIS Development
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, GIS Development
Bus Facilities	Public Transportation, GIS Development
Job Access Routes	Public Transportation, GIS Development
New Britain Hartford Busway	Public Transportation, GIS Development
Bus Service Buffers	
.75 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

Data	Source
Census Tract Boundaries	GIS Development, US Census
Demographic & Socio-Economic Data	
Low Income Data	US Census, American Community Survey, CT DOT Census Modeling Section
Limited English Proficiency (LEP) Data	US Census, American Community Survey, Census Modeling Section
Minority Data	US Census, Census Modeling Section

Methodology 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 and by the Bureau of Public Transportation consultant, KFH Group.

- **Rail System Mapping**

  The rail system mapping was developed by first compiling the various base layers including geographic boundary information. Passenger rail and station feature layers were then added to the base maps and a 2.5-mile service buffer was then created around each of the rail stations and was added to the mapping for comparison against the various demographic and socio-economic data.

- **Transit (Bus) Mapping**
  The bus system mapping was compiled by first compiling the various base layers including geographic boundary information. Bus system information was then added to the mapping including local intercity bus, express bus service and stop locations and Job Access routes. Additionally the rural transit district boundaries were added along with other bus facilities. A 3/4 mile service buffer was then created around the local intra-city bus service and Job Access routes and a 2.5 mile service area buffer was established around each of the express system bus stops. These were then added to the mapping for comparison against the various demographic and socio-economic data.

- **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 Community Survey sources including Low Income, Limited English Proficiency, and Minority data as follows:

  Low Income is 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 Persons of Interest (Race) data were used directly from their original source US Census and American Community Survey sources.

The original source demographic and socio-economic data were then intersected geospatially with the bus and rail service area buffers to determine areas of Title VI concern and interest and were then placed on the respective bus and rail service mapping for review. Ultimately these maps can now be utilized for basic determination of Title VI Impact by transit and rail system projects. Furthermore the language based, LEP and Safe Harbor mapping can be utilized in determination of LEP concerns during the required public comment and review processes.

Intent and Purpose of Mapping and Associated Data Tables

The Department, through the GIS Development and Census Modeling Sections has prepared various demographic and socio-economic data including Low Income, Limited English Proficiency, and Minority data to support its Title IV mapping and analysis needs.

As part of its Title IV compliance review, the Department has prepared a representative sampling of maps on the statewide, County and Urbanized Area levels against these demographic and socio-economic data to visually demonstrate the potential spatial analysis that could be done with these data. PDF versions of this mapping have been made available through the Department's website through the following web link:

http://www.ct.gov/dot/cwp/view.asp?a=3529&q=305564&dotNav=|

Title VI Demographic Mapping.

It is important to note that these resultant maps are only a limited sampling of what analysis could truly be done through the tools available within the Department's Geospatial Information System. The true power is evident in its capacity to provide comparative spatial analysis at any scale thus enabling the identification of localized service area or neighborhood language/income/race concerns for a specific localized project all the way to more regional impacts resulting from a major project such as the New Haven Hartford Springfield high speed rail.

Section XIII – Monitoring Transit and Rail Service

Section XIII-1 – Attachment M – Customer Satisfaction Survey
Section XIII-2 – Customer Satisfaction Survey Detail (Attachments A,B,C,D,E,F,G,H,I,J,K,L are only available on website – files too large)

SECTION XIII: MONITORING TRANSIT SERVICE

2012 Monitoring Effort

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. That assessment compared the levels of bus and rail transit service provided by the Connecticut Department of Transportation to the minority and non-minority communities and the low-income and non-low-income communities against overall system standards and compared both the levels and quality of service provided to the minority and low-income communities to service provided to the non-minority and non-low-income communities 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.

In the 2009 exercise, the Department followed **Option A: Level of Service Methodology** from the FTA Circular. That methodology requires:

(1) Selection of a sample of bus routes and commuter rail services that provide service to a demographic cross-section of the population in each large urbanized area. A portion of the routes in the sample should be those routes that provide service to predominantly minority and low-income areas.

(2) Assessment of the performance of each route in the sample against each of the Department's service standards and policies.

(3) Comparison of the transit service observed in the assessment to the established service policies and standards.

(4) If there had been cases in which observed service did not meet the stated service policy or standard, the Department would have determined why the discrepancy exists and taken corrective action to correct the discrepancy. However, the 2009 review did not find any instances where the level of service observed for routes/services in minority communities was less than the standards or less than the level of service provided in non-minority communities.

For the 2012 monitoring analysis, the Department changed approaches. Different methodologies were followed for the monitoring analyses of rail and bus services provided by the Department. The bus service analysis used a locally developed option while the rail analysis used the survey methodology. These analyses follow.

2012 BUS SERVICE MONITORING ANALYSIS

Inventory of Bus Services

The Department operates express and local buses, and ADA complementary paratransit as described below.

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.

CTTransit fixed route bus services in the three large urbanized areas include:

> The Hartford Division uses 237 buses, serves 27 towns, and operates 30 fixed routes, four limited stop "flyers" and 12 express commuter routes. The division also includes 9 express bus routes operated by four private companies under contract to the Department.
>
> The New Haven Division uses 110 buses, serves 19 towns, and operates 17 fixed bus routes and 2 shuttles.
>
> The Stamford Division uses 54 buses, serves four Connecticut towns, and operates 14 local bus routes, 4 rail shuttles and one express commuter route.

Methodology for Bus Service Analysis

The 2012 monitoring for bus service followed a locally developed methodology as allowed in Option D: Locally Developed Alternative in Chapter 5, Section 5 of Circular C 4702.1A. The methodology combined the characteristics of the methodologies described in options A and B of the Circular: Level of Service and Quality of Service Methodology. A sampling of Census tracts was selected in each of the three urbanized areas of over 200,000 in population in the state and an assessment of route performance for bus services was made in comparison to the established service policies and standards associated with the level of overall service (frequencies), service quality (load factors and on-time performance), and distribution of amenities (age of fleet). If differences are found to exist in any of these factors, the Department would determine whether the differences are significant. If significant disparities in one or more quality of service indicators were confirmed, the Department would determine why the disparity exists and take corrective action to correct the disparity.

Service Area

The three urbanized areas requiring transit service monitoring are the urbanized areas with populations over 200,000. The map in Attachment 1 shows the boundaries of the three large urbanized areas of Hartford, New Haven and Bridgeport-Stamford.

For the purpose of this analysis, the CTTransit bus service areas for Hartford, New Haven, and Bridgeport-Stamford consist of census tracts that meet one or both of two criteria. First, the census tracts intersect with the boundaries of each extended urbanized area (UZA). Second, the census tracts also fall within a ¾ mile of local bus routes or 2 ½ miles of express bus stops. This process resulted in an approximately 200 tract service area for the Hartford UZA, a 135 tract service area for the New Haven UZA, and a 180 tract service area for the Bridgeport-Stamford UZA.

Using data from the 2010 Census, the low income and minority average percentage was calculated for each service area (see Table below). Census tracts were defined as predominantly minority or low income if the percentage of the population in that census tract was greater than the service area average. This was calculated separately for the service areas in each urbanized area. For example, in Bridgeport-Stamford, the average percentage of minority individuals in the service area is 35.10%. About a third of the census tracts have higher minority percentages and are thus considered minority tracts.

Urbanized Area	Percent Minority	Minority Tracts	Percent Low-Income	Low-Income Tracts
Harford	35.50	90 of 204	10.58	78 of 203
New Haven	31.89	55 of 137	9.92	52 of 135
Bridgeport-Stamford	35.10	67 of 182	8.18	65 of 182

Source: 2010 Census

The calculation of minority and low-income tracts was based upon guidance in C.4702.1A section II-6u that states "Predominantly Minority Area means a geographic area, such as a neighborhood, Census tract or traffic analysis zone, where the proportion of minority persons residing in that area exceeds the average proportion of minority persons in the recipient's service area."

Methodology for Selection of Random Census Tracts

For each service area, the census tracts were then divided into four lists: minority, non-minority, low income, and non-low income. Each tract was assigned a random number and sorted using the random number generating feature in Excel. A random sample of census tracts was selected for the CTTransit and CTRail service area. For each urbanized area, this included 10 of each classification of census tracts 1) minority, 2) non-minority, 3) low income and, 4) non-low income. Ten tracts were selected from each list, creating a sample of 40 tracts per service area (120 total tracts for analysis). This is out of a total of about 520 census tracts in the UZAs that CTTransit serves.

Table 1 is attached below as an illustration of the random selections for the Hartford urbanized area and the Hartford area CTTransit bus system. For each of the randomly chosen minority Census tracts that were selected in Hartford, the chart shows the routes that serve that tract. Similar tables are available for the New Haven and Stamford service areas.

Attached as Table 2 is a sample of a reverse listing of all the affected routes and which tracts they serve, also for the Hartford area. Each local bus route that intersects a tract is listed as serving that tract. Each express bus route within a 2½ mile buffer that intersects a tract is listed as serving that tract. Those express buses not assigned to a specific UZA were not included (e.g. the Torrington Express, New Haven/Hartford Express, Meriden Express, etc.). The Somers Express (Hartford) was also assumed to be a subsidiary line and not included in the listings.

Table 3 lists the census tracts selected in the random sample by category - minority, low income, non-minority, non-low income. The sample shown is for the New Haven urbanized area. The top ten census tracts on the list are highlighted. These highlighted tracts for each of the urbanized areas for each of the four categories were the tracts that were analyzed for conformance with performance standards. A similar table was developed for each large urban bus service area.

COMPARATIVE ANALYSIS

The services in the sampled Census tracts were analyzed for each of the following performance characteristics in the sampled minority, non-minority, above poverty and below poverty tracts:

- Frequency,
- Vehicle load,
- On-time performance,
- Vehicle assignment.

Table 4 shows a sample for the Hartford bus division of the selected Minority Census tracts, the bus services within that tract, and the statistics that are collected for each service in order to provide the input for the ultimate analysis. Similar charts were prepared for routes in each urbanized area for the selected non-minority, low-income, and non-low-income tracts. The full inventory of tables will be posted in the version of the Program that will be posted on the Department website.

The following analysis compares the service characteristics in the various sampled Census tracts in order to determine if there is a significant difference in services and performance of services in each of the sample groups.

Frequency (Vehicle Headway)

The Department has a goal 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.

FREQUENCY BY DIVISION AND DEMOGRAPHICS – Weighted Average Headway

Division and Time Period	Minority	Non-Minority	Poverty	Non-Poverty
Hartford – Weekday Peak	17.9	13.0	26.2	22.9
Hartford – Weekday Midday	23.6	20.5	21.1	30.3
Hartford – Weekday Evening	35.1	36.8	46.2	42.6
Hartford - Saturday	36.3	58.8	40.8	37.4
Hartford – Sunday	55.0	57.0	60.3	76.2
New Haven – Weekday Peak	16.1	21.7	17.2	19.0
New Haven – Weekday Midday	21.8	27.5	22.9	27.5
New Haven – Weekday Evening	35.9	30.0	38.7	54.0
New Haven – Saturday	48.0	36.5	36.7	30.0
New Haven – Sunday	61.2	68.5	62.0	55.0
Stamford – Weekday Peak	27.0	27.3	30.0	No bus
Stamford – Weekday Midday	34.9	33.3	45.0	service in the
Stamford – Weekday Evening	35.5	37.5	40.0	Census tract
Stamford – Saturday	43.5	54.5	60.0	samples
Stamford – Sunday	57.1	60.0	60.0	selected

Conclusion - Services in the minority and non-minority, and low-income and non-low-income tracts fall within the agency's service standards and do not vary significantly.

Vehicle Load

The Department load factor guidelines used for local bus service are designed to accommodate standees during peak hours for all or part of their trip. Most off-peak trips are designed to provide a seat for all passengers, though there may be some trips that carry standees. The maximum peak load factor is 1.33. The maximum off-peak, evening and weekend load factor is 1.00. The load factor for commuter express service should be scheduled to minimize standees due to state laws that prohibit standees on buses operating on interstate highways for safety reasons, and the standard for all those services is 1.0.

AVERAGE LOAD FACTOR BY DIVISION AND DEMOGRAPHICS

Division and Time Period	Minority	Non-Minority	Poverty	Non-Poverty
Hartford – Weekday Peak	44.7	35.9	34.1	24.4
Hartford – Weekday Midday	41.7	26.5	39.6	23.6
Hartford – Weekday Evening	32.5	21.1	29.3	16.3
Hartford – Saturday	31.0	44.5.	32.4	36.0
Hartford – Sunday	25.1	27.6	41.8	35.7
New Haven – Weekday Peak	39.8	41.1	42.0	38.5
New Haven – Weekday Midday	50.7	47.7	46.5	42.0
New Haven – Weekday Evening	48.5	34.3	47.6	25.6
New Haven –Saturday	41.7	48.9	37.1	36.1
New Haven – Sunday	42.9	31.6	44.1	37.6
Stamford – Weekday Peak	33.4	40.0	42.0	No bus
Stamford – Weekday Midday	27.0	24.4	27.0	service in the
Stamford – Weekday Evening	18.0	23.6	26.0	Census tract
Stamford – Saturday	24.7	38.2	51.0	samples
Stamford – Sunday	24.8	31.8	28.5	selected

Conclusion – Based upon the analysis, all services are scheduled in compliance with the guidelines for local and commuter express services in both the minority and non-minority, and low-income and non-low-income service areas.

Average load factors do show some differences especially in Hartford and New Haven on weekdays between target groups and non-target groups. This difference may be due to the sample Census tracts selected and the routes that service those tracts. The nature of load factors is that there are likely to be more riders in areas with more transit dependents. This difference merits further observation to be sure that it is not a pattern of differential service provision. In any case, none of the average load factors come close to exceeding the system standard when averaged across the relevant time period.

On-Time Performance

For purposes of this analysis, “on-time” is defined as a bus departing a time point zero to five minutes later than scheduled. Under no circumstances should buses depart any time point ahead of schedule. On routes along corridors where headways are 10 minutes or less, the on-time performance goal is 90%. The goal is 95% on routes that operate at wider headways or during the off-peak.

On-time performance information is not currently collected in a systematic or automatic way that would support the Title VI monitoring effort. On-time performance data are collected by street supervisors. Their checks monitored all buses at various timepoints, but their reports were not broken down by route, except in the Hartford Division. And even in the Hartford Division, the data was not broken down into peak, midday and evening.

The Department is in the process of equipping the supervisor vehicles with laptop computers. Among many other functions, that will automate the on-time data collection and allow the generation of reports on a route-by-route basis. The Department is also beginning the procurement of an automatic vehicle location system that would be able to provide on-time data for every timepoint on every route. The Department’s on-time performance methods will continue to be adapted so that data are collected by route and in forms that can be easily interpreted for the next service monitoring update.

ON-TIME PERFORMANCE BY DIVISION AND DEMOGRAPHICS

Division and Time Period	Minority	Non-Minority	Poverty	Non-Poverty
Hartford – Weekday	80.9	81.4	82.5	77.8
Hartford – Saturday	69.1	72.4	61.4	71.6
Hartford – Sunday	49.2	60.1	62.5	58.4
New Haven – Weekday Peak		NO		
New Haven – Weekday Midday		VALID		
New Haven – Weekday Evening		DATA		
New Haven –Saturday		COLLECTED		
New Haven – Sunday				
Stamford – Weekday Peak		NO		
Stamford – Weekday Midday		VALID		
Stamford – Weekday Evening		DATA		
Stamford – Saturday		COLLECTED		
Stamford - Sunday				

Conclusion – Based only upon the partial analysis of data available, services are generally not performing on schedule at the levels desired by the guidelines for local and commuter express services. There appears to be little difference, though, in the on-time performance in the minority and non-minority, and low-income and non-low-income service areas.

Vehicle Assignment

Buses are assigned to service without regard to 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, heavier local routes may use 60-foot higher capacity transit coaches, and commuter express services utilize cruiser bus coaches. Buses are 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 but in order to determine the age of the fleet in order to determine if there was a significant difference in age of buses used on various routes that could not be explained by the need for a specific bus on that route, a random day was selected for the Hartford Division and the age of the buses assigned that day to each route was calculated.

VEHICLE ASSIGNMENT BY DEMOGRAPHICS

Division and Time Period	Minority	Non-Minority	Poverty	Non-Poverty
Hartford - Weekday	4.69	4.78	4.74	4.72
Hartford – Weekday Midday	4.68	5.07	4.94	4.77
Hartford – Weekday Evening	4.55	4.99	4.71	4.80

Conclusion - The allocation of vehicles is appropriate to the service type and based upon the sampling in this one division, there appear to be no significant differences in vehicle age in both the minority and non-minority census tracts, and poverty and non-poverty census tracts.

2012 RAIL SERVICE MONITORING ANALYSIS

Inventory of Services

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. The service is operated for the Department through an agreement with MTA-Metro North Railroad, a direct recipient of FTA funds, who also prepares their own Title VI reports and reports to FTA Region II.

The NHL is primarily a four-track main line railroad and includes the Main Line and three branch lines. The NHL includes 19 Main Line stations in Connecticut, all of them in the New Haven or Bridgeport-Stamford urbanized area. The Waterbury Branch Line operates between Waterbury and Devon (Milford) and has six stations, four of them in the New Haven urbanized area. The Danbury Branch Line operates between Danbury and Norwalk and has seven stations, four of them within the Bridgeport-Stamford urbanized area. The New Canaan Branch Line operates between New Canaan and Stamford and has four stations, all of them within the Bridgeport-Stamford urbanized area.

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. There are nine stations on SLE, all of them within the extended New Haven urbanized area.

New Haven Line Analysis

Metro North submits their monitoring analysis to FTA Region II using the survey methodology. The Department elected to review the Metro North submission to FTA based upon the survey methodology and has determined that the survey had adequate coverage of the New Haven Line to allow the Department to draw statistically correct assumptions about level and quality of service.

Attachment 2 to this section is the stand-alone document that shows the analysis of rail service using multiple analytical techniques employed to monitor the quality of transit service between **"**minority**"** and **"**non-minority**"** areas (using customer-based analyses), as well as **"**above poverty**"** and **"**below or at poverty levels**"** (as classified by Title VI definitions; using customer and station-based analyses). The source data for that analysis is from the June 2010 customer survey conducted by Metro-North using the responses from customers with Connecticut-based trips.

The survey was conducted Wednesday, June 2nd, 2010; Saturday, June 5, 2010; and Sunday, June 6, 2010. The survey was distributed and primarily collected on-board randomly selected train trips (forming a representative system-wide sample) during all time periods (peak, reverse peak, weekday off-peak and weekend). Some of the completed questionnaires were returned by mail. This survey included, for the first time, questions regarding the race of the individual respondent. Total usable responses, out of approximately 4,300 questionnaires distributed on board trains, were in the 70% - 75% range.

The performance indicators analyzed based on the latest Customer Travel/Satisfaction Survey, June 2010.included:

- Comparison of overall opinions toward MNR services
- Comparison of travel times
- Comparison of transfers as a measure of directness of service
- Comparison of trip cost based upon fare media used and by trip cost per mile

Each of these measures was analyzed for "Minority" and "Non-minority" respondents and for "Above Poverty" and "At or Below Poverty" respondents.

Conclusion – As the analysis included in Attachment 2 shows, for all performance measures it was concluded that there is no statistically significant difference between minority and non-minority or above poverty and below poverty customers for the New Haven Line service.

Shore Line East Analysis

Most of the Shore Line East service area is within an urbanized area over 200,000 in population. Therefore, the service would be subject to a Title VI analysis. However, as the maps in Attachment 1 show, the only low-income or minority tracts in the SLE service area are in the city of New Haven and the west end of East Haven, served only by the terminal stop of the SLE services. Since those services are virtually totally peak-direction oriented, the population in these tracts are not SLE users since they could not complete a trip without travelling backwards to an earlier stop then traveling into New haven. To the extent that this population is a rail using population, the MetroNorth New Haven Line service equity analysis would cover the analysis of any rail trips they took in the peak direction out of New Haven, and a Shore Line East service equity analysis would not offer any valid assessment.

Table 1 - Randomly Selected Census Tracts and Routes That Serve Them - Hartford

Minority Tracts	Bus Routes	Rail Stations
416600	Corbin's Express	None
524502	Simsbury-Granby Express; Avon Canton Express; Asylum Ave (72); Granby St (74); Albany/Bloomfield Ave (56-58)	Hartford Union
501700	Simsbury-Granby Express; Avon Canton Express; Garden St (44); Vine St (46); Blue Hills Ave (50-54); Albany/Bloomfield Ave (56-58)	Hartford Union
514600	Silver Lane (83); Burnside Ave-Manchester (88); Buckland Express	None
500300	New Britain Ave (37-39); New Britain (41); Park Street (31-33); Campfield Ave (43); Franklin Ave (47)	Hartford Union
510100	Park Ave (94-96)	Hartford Union
515102	Silver Lane (83); Buckland Flyer (80); MCC Flyer (85); Burnside Ave-Manchester (88); Glastonbury Express; Buckland Express	None
504500	Hillside Ave (63); New Britain Ave (37-39); New Britain (41)	Hartford Union
504900	Westfarms Flyer (35); New Britain Ave (37-39); Hillside Ave (63); Park Street (31-33)	Hartford Union
415400	New Britain (41); Newington Express	Berlin

NonMinority Tracts	Bus Routes	Rail Stations
487500	Buckland Express; Tower Ave (92); Park Ave (94-96)	None
477200	Simsbury-Granby Express	None
496500	Avon/Canton Express; Farmington Ave (60-66); Park St (31-33)	None
460100	Corbin's Express; Unionville Express; Farmington Ave (60-66); Westfarms Flyer; New Britain Ave (37-39)	None
680200	Wthrsfld Ave (53-55)	None
510900	Glastonbury Express; Glastonbury (95)	None
490302	Franklin Ave (47); Cromwell Express; Century Hills Express; Newington Express	None
487201	Buckland Express	None
492100	Forbes St (91); Wthrsfld Ave (53-55); Broad St (61); Berlin Turnpike Flyer; Glastonbury Express	None
473501	Windsor Ave (32-36); Blue Hills Ave (50-54); Windsor Express; Windsor Locks Express	Windsor

Below Poverty Tracts	Bus Routes	Rail Stations
415600	None	Berlin
500100	Campfield Ave (43); Franklin Ave (47); Wthrsfld Ave/Middletown (53-55)	Hartford Union
514800	Tolland St (82-84); Burnside Ave-Manchester (88)	None
417200	Corbin's Express; Newington Express; Capitol Ave (69)	None
501500	Vine (46); North Main (40-42); Tower Ave (92); Garden St (44)	Hartford Union
501400	Vine (46); Blue Hills Ave (50-54); Albany/Bloomfield Ave (56-58);	Hartford Union

500300	New Britain Ave (37-39); New Britain (41); Park Street (31-33); Campfield Ave (43); Franklin Ave (47)	Hartford Union
502500	Locust St (59); Wthrsfld Ave/Middletown (53-55); Berlin Turnpike Flyer; Glastonbury Express	Hartford Union
510400	Burnside Ave-Sunset Hills (86); Burnside Ave-Manchester (88); Park Ave (94-96); Forbes St (91); Glastonbury (95); Brewer St (87); Buckland Flyer; MCC Flyer	Hartford Union
541800	Wthrsfld Ave (53-55)	None

NonBelow Poverty Tracts	Bus Routes	Rail Stations
496400	Park St (31-33); Westfarms Flyer; Farmington Ave (60-66); Corbin's Express; Avon/Canton Express	None
406002	None	None
510900	Glastonbury Express; Glastonbury (95)	None
484100	Windsor Express; Windsor Locks Express	Windsor; Wind
477200	Simsbury-Granby Express	None
503900	Avon Canton Express; Granby St (74); Ashley St (76); Blue Hills Ave (50-54); Albany/Bloomfield (56-58); Tower Ave (92); Vine St (46)	Hartford Union
515101	Silver Lane	None
530301	Tolland St (82-84)	None
530302	Tolland St (82-84)	None
514300	Buckland Express; Burnside Ave (88); Silver Lane (83)	None

Table 2: Hartford Division Bus Routes and Rail Stations by Selected Census Tracts

Bus Line	Census Tracts		Rail Station	Census Tracts
Albany/Bloomfield Ave (56-58)	503900		Berlin	415400
Albany/Bloomfield Ave (56-58)	524502		Berlin	415600
Albany/Bloomfield Ave (56-58)	501700		Hartford Union	524502
Albany/Bloomfield Ave (56-58)	501400		Hartford Union	501700
Ashley St (76)	503900		Hartford Union	500300
Asylum Ave (72)	524502		Hartford Union	510100
Avon Canton Express	524502		Hartford Union	504500
Avon Canton Express	501700		Hartford Union	504900
Avon Canton Express	503900		Hartford Union	500100
Avon/Canton Express	496500		Hartford Union	501500
Avon/Canton Express	496400		Hartford Union	501400
Berlin Turnpike Flyer	502500		Hartford Union	500300
Berlin Turnpike Flyer	492100		Hartford Union	502500
Blue Hills Ave (50-54)	501700		Hartford Union	510400
Blue Hills Ave (50-54)	503900		Hartford Union	503900
Blue Hills Ave (50-54)	501400		Windsor	473501
Blue Hills Ave (50-54)	473501		Windsor	484100
Brewer St (87)	510400		Windsor Lock	484100
Broad St (61)	492100			
Buckland Express	514600			
Buckland Express	514300			
Buckland Express	487201			
Buckland Express	487500			
Buckland Express	515102			
Buckland Flyer (80)	510400			
Buckland Flyer (80)	515102			
Burnside Ave-Manchester (88)	514300			
Burnside Ave-Manchester (88)	514600			
Burnside Ave-Manchester (88)	510400			
Burnside Ave-Manchester (88)	514800			
Burnside Ave-Manchester (88)	515102			
Burnside Ave-Sunset Hills (86)	510400			
Campfield Ave (43)	500300			
Campfield Ave (43)	500300			
Campfield Ave (43)	500100			
Capitol Ave (69)	417200			
Century Hills Express	490302			
Corbin's Express	416600			
Corbin's Express	496400			
Corbin's Express	417200			
Corbin's Express	460100			
Cromwell Express	490302			
Farmington Ave (60-66)	496400			
Farmington Ave (60-66)	460100			
Farmington Ave (60-66)	496500			
Forbes St (91)	510400			
Forbes St (91)	492100			
Franklin Ave (47)	500300			
Franklin Ave (47)	500300			
Franklin Ave (47)	500100			
Franklin Ave (47)	490302			
Garden St (44)	501700			
Garden St (44)	501500			
Glastonbury (95)	510900			
Glastonbury (95)	510400			
Glastonbury (95)	510900			
Glastonbury Express	510900			
Glastonbury Express	502500			
Glastonbury Express	492100			
Glastonbury Express	510900			
Glastonbury Express	515102			
Granby St (74)	524502			
Granby St (74)	503900			
Hillside Ave (63)	504900			
Hillside Ave (63)	504500			
Locust St (59)	502500			
MCC Flyer (85)	510400			
MCC Flyer (85)	515102			
New Britain (41)	500300			
New Britain (41)	415400			
New Britain (41)	500300			
New Britain (41)	504500			
New Britain Ave (37-39)	504900			
New Britain Ave (37-39)	500300			
New Britain Ave (37-39)	500300			
New Britain Ave (37-39)	460100			
New Britain Ave (37-39)	504500			
Newington Express	415400			
Newington Express	417200			
Newington Express	490302			
North Main (40-42)	501500			
Park Ave (94-96)	510100			
Park Ave (94-96)	510400			
Park Ave (94-96)	487500			
Park St (31-33)	496400			
Park St (31-33)	496500			
Park Street (31-33)	500300			
Park Street (31-33)	500300			
Park Street (31-33)	504900			
Silver Lane (83)	515101			
Silver Lane (83)	514600			
Silver Lane (83)	514300			
Silver Lane (83)	515102			
Simsbury-Granby Express	524502			
Simsbury-Granby Express	501700			
Simsbury-Granby Express	477200			
Simsbury-Granby Express	477200			
Tolland St (82-84)	530301			
Tolland St (82-84)	530302			
Tolland St (82-84)	514800			
Tower Ave (92)	503900			
Tower Ave (92)	501500			
Tower Ave (92)	487500			
Unionville Express	460100			
Vine St (46)	501400			
Vine St (46)	501500			
Vine St (46)	501700			
Vine St (46)	503900			
Westfarms Flyer (35)	496400			
Westfarms Flyer (35)	460100			
Westfarms Flyer (35)	504900			
Windsor Ave (32-36)	473501			
Windsor Express	484100			
Windsor Express	473501			
Windsor Locks Express	484100			
Windsor Locks Express	473501			
Wthrsfld Ave/Middletown (53-55)	541800			
Wthrsfld Ave/Middletown (53-55)	492100			
Wthrsfld Ave/Middletown (53-55)	680200			
Wthrsfld Ave/Middletown (53-55)	502500			
Wthrsfld Ave/Middletown (53-55)	500100			

Table 3 - Census Tracts - Randomly Selected and Total

New Haven Minority	Random	New Haven NonMinority	Random	New Haven BP	Random	New Haven NonBP	Random
141200	0.492492	142200	0.125221	154500	0.777019	184300	0.401524
361402	0.585909	175100	0.09461	141700	0.120193	141100	0.943794
140900	0.430781	160100	0.276915	141300	0.088268	343400	0.13456
142604	0.926008	170600	0.721773	142500	0.182014	361100	0.868762
140500	0.908029	167202	0.385895	140500	0.467419	184100	0.464774
140400	0.036695	176000	0.160837	142300	0.901192	186200	0.519063
154500	0.632402	343400	0.532977	175200	0.079428	154300	0.337286
171600	0.574164	142000	0.385857	170300	0.93599	160200	0.90719
141300	0.7407	630100	0.03684	142700	0.352273	670100	0.241926
165801	0.574189	190200	0.788431	140700	0.742931	343200	0.11508
142100	0.664325	175900	0.953811	170100	0.567371	170500	0.280118
141400	0.941563	150700	0.451274	142602	0.377714	186100	0.475535
171500	0.379578	151100	0.493708	140600	0.077849	184500	0.820645
141100	0.410627	175300	0.512782	165801	0.663987	170700	0.340815
140200	0.830993	165900	0.029753	140400	0.016473	166001	0.42826
170700	0.525931	161100	0.208912	140300	0.943199	165802	0.21613
142300	0.97818	154700	0.97582	165500	0.98353	610400	0.731594
170100	0.972136	110201	0.762251	171300	0.896982	154600	0.03768
140100	0.268241	154800	0.520378	141900	0.568659	160100	0.884796
140600	0.119437	194100	0.272256	170900	0.124964	171200	0.341328
170200	0.410732	165300	0.356952	171400	0.15134	150800	0.204629
171300	0.321869	180500	0.527192	141200	0.420626	154200	0.278109
361500	0.548784	180200	0.467317	171000	0.994206	190301	0.757047
154600	0.704664	610100	0.443241	140100	0.371518	180300	0.537194
141800	0.696133	184500	0.931928	154400	0.590694	155000	0.293674
170400	0.331086	190302	0.477184	140200	0.171909	190100	0.886629
170800	0.944339	610200	0.141474	142601	0.775244	343101	0.919454
154200	0.23139	151200	0.761195	141600	0.575583	184600	0.184586
343101	0.519644	166002	0.814086	170800	0.357114	180601	0.202236
142400	0.636545	175700	0.055674	140900	0.903595	194202	0.46152
361401	0.243293	186100	0.983214	142400	0.352692	166002	0.264658
170900	0.850113	670100	0.838947	154900	0.395824	165100	0.656569
141500	0.269844	352701	0.001353	142100	0.977512	610100	0.066171
142601	0.475881	180300	0.429829	140800	0.040508	151200	0.80167
155000	0.805851	670200	0.500421	171500	0.715391	161100	0.899155
165100	0.451162	154900	0.520548	155100	0.090108	165400	0.766569
140700	0.342117	142800	0.363337	141400	0.710174	180100	0.932766
171000	0.650622	343300	0.802743	142200	0.160333	120100	0.752215
140800	0.794251	157300	0.178001	175100	0.710712	175700	0.753342
165400	0.563456	184600	0.528667	170200	0.764042	165600	0.701044
142500	0.511315	171700	0.493412	142000	0.450585	190302	0.186387
165500	0.894639	180601	0.790162	141500	0.151053	141000	0.643546

352800	0.543522
165700	0.183694
170300	0.322453
171400	0.715839
154100	0.245083
165600	0.900043
140300	0.387884
141600	0.758534
142603	0.235145
142700	0.618849

167300	0.407959
157200	0.162964
120100	0.030926
175800	0.831823
180400	0.426089
166001	0.740154
180602	0.382265
343200	0.715967
194201	0.961858
610300	0.684336
610400	0.723323
175600	0.859704
180100	0.453647
160200	0.49189
165200	0.567729
171200	0.728008
141000	0.152795
157400	0.687481
343102	0.11864
167201	0.761027
184200	0.74685
157100	0.243078
190100	0.926178
171100	0.39794
184700	0.250657
167100	0.741415
175400	0.388025
175200	0.992646
184400	0.156617
175500	0.388377
150800	0.928253
165802	0.282962
680100	0.038558
141900	0.682537
186200	0.231919
184300	0.583404
184100	0.494726
194202	0.979388
347100	0.273496
170500	0.421568
190301	0.648099
155100	0.436782
361100	0.766939

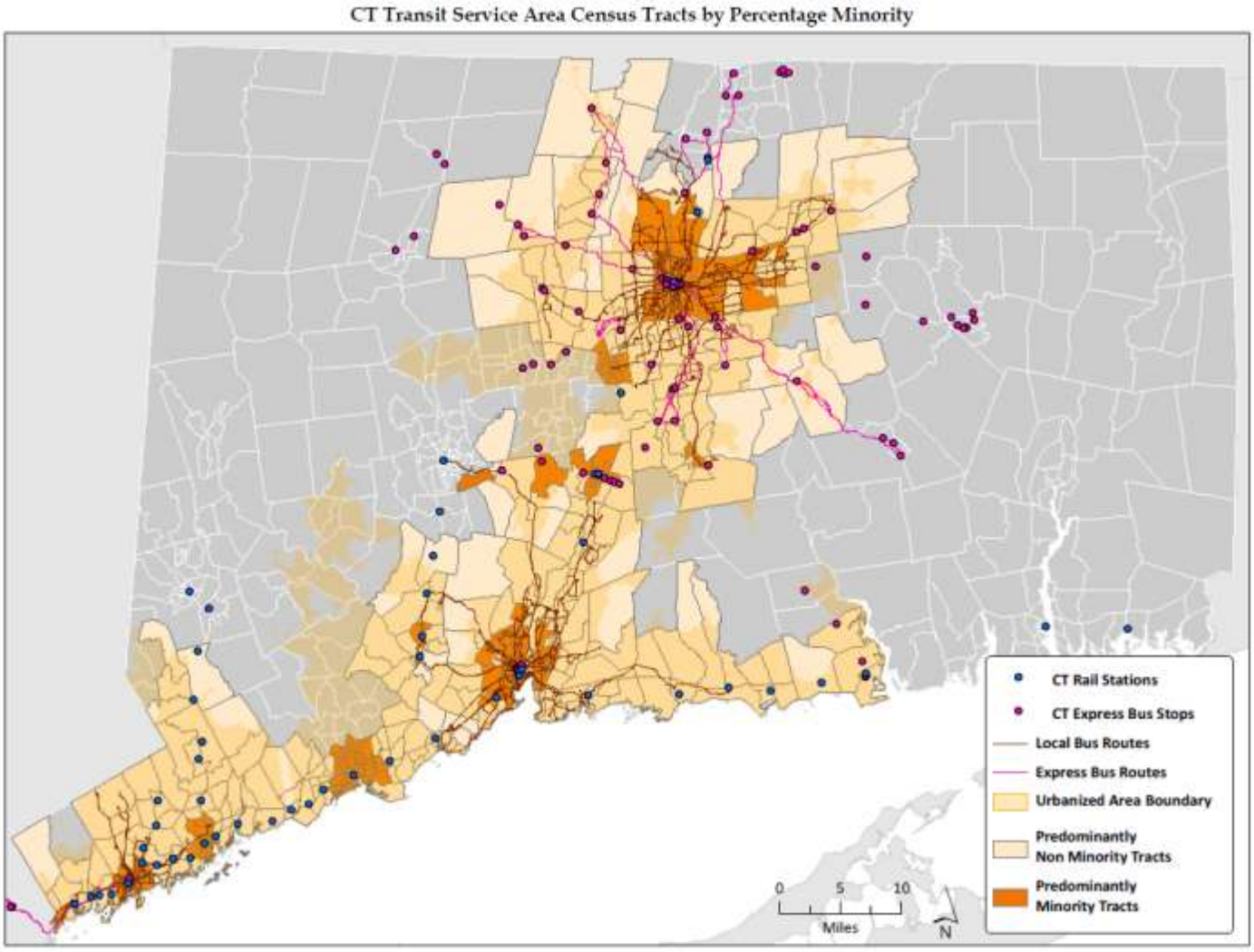
154100	0.487964

610300	0.088714
167300	0.063132
194100	0.44427
610200	0.012046
184400	0.283863
194201	0.949887
180400	0.791884
184200	0.364278
175900	0.683927
171700	0.387563
167201	0.207581
175600	0.994426
154700	0.94268
110201	0.859355
170400	0.885112
343300	0.365493
352800	0.415671
165200	0.774312
167100	0.950801
175300	0.014872
157200	0.049452
154800	0.430279
680100	0.469993
165700	0.613082
175400	0.884658
150700	0.12226
171100	0.058736
165300	0.907813
343102	0.403723
165900	0.350605
167202	0.003736
180200	0.413506
670200	0.849371
171600	0.785062
180500	0.564713
141800	0.693874
175800	0.397852
347100	0.805851
157100	0.091539
176000	0.2544
630100	0.848011
170600	0.17371
157400	0.090239
180602	0.467511
352701	0.780444
190200	0.60908

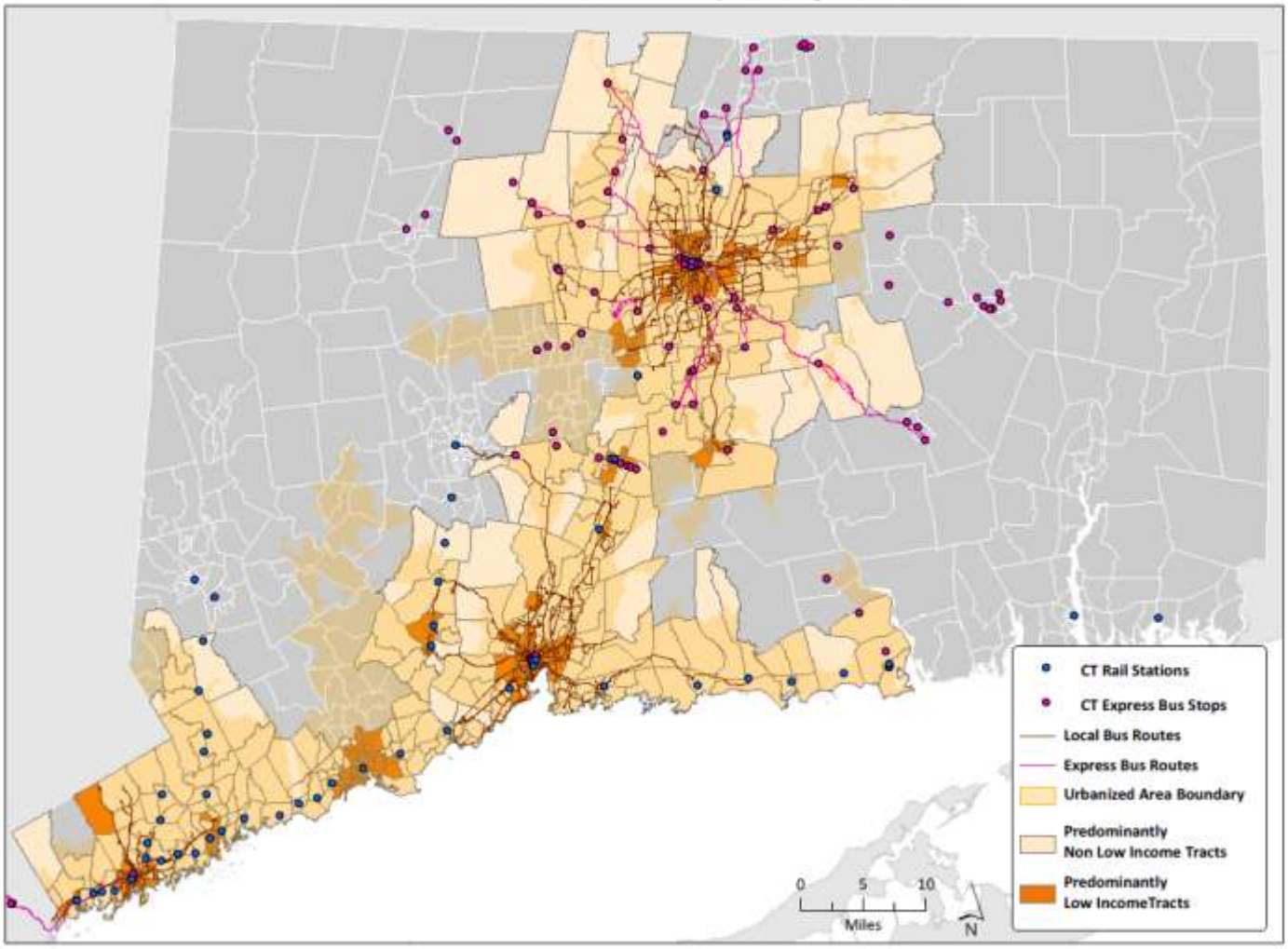
142800	0.650303
157300	0.386782
175500	0.120449
184700	0.583038

Table 4: Hartford Minority Tracts Weekday											
Census Tracts	Route	Frequency				Load Factor				On Time Performance	Average age of bus
		A.M.	MID	P.M.	EVE	A.M.	MID	P.M.	EVE		
416600	2- Corbins Express	25	8hrs	30	25	0.15	0.11	0.20	0.25	81%	4.95
524502	11- Simsbury/Granby Express	15	4hrs	15	25-50	0.49	0.09	0.26	0.29	86%	4.95
	1- Avon/Canton Express	25	5hrs	30	30-55	0.42	0.14	0.32	0.20	81%	4.95
	72- Asylum Ave	20	30	30	20	0.32	0.29	0.38	0.17	84%	5.00
	74- Granby St	25-45	45	30	30	0.37	0.38	0.30	0.19	67%	6.00
	56/58- Albany Ave/Bloomfield Ave	15	30	40	60	0.29	0.28	0.32	0.29	92%	4.50
501700	11- Simsbury/Granby Express	15	4hrs	15	25-50	0.49	0.09	0.26	0.29	86%	4.95
	1- Avon/Canton Express	25	5hrs	30	30-55	0.42	0.14	0.32	0.20	81%	4.95
	44- Garden St	30	60	35	40	0.19	0.25	0.23	0.13	85%	3.00
	46- Vine St	10	20	15	60	0.25	0.37	0.30	0.26	86%	5.00
	50/54- Blue Hills Ave	10	10	15-30	15-30	0.50	0.54	0.52	0.41	77%	6.30
	56/58- Albany Ave/Bloomfield Ave	15	30	40	60	0.29	0.28	0.32	0.29	92%	4.50
514600	83- Silver Ln	15	20-40	30-60	20-30	0.46	0.59	0.72	0.47	80%	5.40
	88- Burnside Ave/Manchester	20	30	60	30-50	0.43	0.50	0.54	0.31	81%	4.13
	3- Buckland Exp	20	5hrs	20-50	20-50	0.33	0.65	0.33	0.13	92%	4.95
500300	37/39- New Britain Ave	10	30	40	20-40	0.40	0.53	0.61	0.41	73%	6.50
	41- New Britain	35	30	25	30-35	0.52	0.62	0.60	0.52	89%	4.00
	31/33- Park St	20	10	60	30-60	0.45	0.54	0.57	0.42	58%	5.03
	43- Campfield Ave	20	30	45	40	0.22	0.21	0.27	0.24	91%	N/A
	47- Franklin Ave	10	10	30	1-2hrs	0.45	0.43	0.43	0.48	88%	5.50
510100	94/96- Park Ave	20	60	40	25	0.29	0.20	0.28	0.33	90%	5.33
515102	83- Silver Ln	15	20-40	30-60	20-30	0.46	0.59	0.72	0.47	80%	5.40
	80- Buckland Flyer	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
	85- MCC Flyer	60	3hrs	60	0	0.82	0.55	0.46	0.00	94%	5.40
	88- Burnside Ave/Manchester	20	30	60	30-50	0.43	0.50	0.54	0.31	81%	4.13
	4- Glastonbury Express	20	0	25	22	0.28	0.00	0.22	0.05	87%	4.95
	3- Buckland Exp	20	5hrs	20-50	20-50	0.33	0.65	0.33	0.13	92%	4.95
504500	63- Hillside Ave	20	30	25	30	0.45	0.32	0.36	0.28	92%	N/A
	37/39- New Britain Ave	10	30	40	20-40	0.40	0.53	0.61	0.41	73%	6.50
	41- New Britain	35	30	25	30-35	0.52	0.62	0.60	0.52	89%	4.00
504900	35- Westfarms Flyer	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
	37/39- New Britain Ave	10	30	40	20-40	0.40	0.53	0.61	0.41	73%	6.50
	63- Hillside Ave	20	30	25	30	0.45	0.32	0.36	0.28	92%	N/A
	31/33- Park St	20	10	60	30-60	0.45	0.54	0.57	0.42	58%	5.03
415400	41- New Britain	35	30	25	30-35	0.52	0.62	0.60	0.52	89%	4.00
	7- Newington Express	35	0	25	0	0.30	0.00	0.23	0.00	93%	4.95

ATTACHMENT 1: Map with Low Income and Minority Census Tracts Mapped Against Transit Services



CT Transit Service Area Census Tracts by Percentage Low Income



ATTACHMENT 2

CONNECTICUT DEPARTMENT OF TRANSPORTATION

MONITORING TRANSIT SERVICE
NEW HAVEN LINE RAIL

ANALYSIS OF CUSTOMER TRAVEL/SATISFACTION SURVEYS

SUPPLEMENT TO 2011 TITLE VI TRIENNIAL SUBMISSION
(APRIL 2011 - APRIL 2014)

This section monitors the quality of transit service among minority and non-minority user groups, as well as above poverty and below or at poverty levels in the Connecticut portion of the New Haven Line service area. That service is operated by Metro-North Railroad (MNR) under contract to the Department, and the source data for the analysis that follows is from the June 2010 customer survey conducted by Metro-North using the responses from customers with Connecticut-based trips. The Appendices referenced in the text will be maintained in the file and will be available for viewing in locations where the Plan is posted, but will not be attached in TEAM (with the exception of Appendix M, the survey form) due to their volume.

Multiple analytical techniques were employed to monitor the quality of transit service between **"**minority**"** and **"**non-minority**"** areas (using customer-based analyses), as well as **"**above poverty**"** and **"**below or at poverty levels**"** (as classified by Title VI definitions; using customer and station-based analyses).

1. Comparison of opinions toward MNR services - based on the latest Customer Travel/Satisfaction Survey, June 2010.

2. Comparison of travel times - based on the latest Customer Travel/Satisfaction Survey, June 2010.

3. Comparison of transfers - based on the latest Customer Travel/Satisfaction Survey, June 2010.

4. Comparison of trip cost - based on the latest Customer Travel/Satisfaction Survey, June 2010.

I. Transit Opinion Survey

General Background

Customer Travel/Satisfaction Survey Methodology:

- The latest survey was conducted Wednesday, June 2nd, 2010; Saturday, June 5, 2010; and Sunday, June 6, 2010.
    - The survey was distributed and primarily collected on-board randomly selected train trips (forming a representative system-wide sample) during all time periods (peak, reverse peak, weekday off-peak and weekend). Some of the completed questionnaires were returned by mail.
    - This survey included, for the first time, questions regarding the race of the individual respondent.

- Customer response to the Customer Travel/Satisfaction Survey continues to be very strong.
    - - Total usable responses, out of approximately 4,300 questionnaires distributed on board trains, were in the 70% - 75% range.
- The questionnaire asked customers to use the recent experiences they have had with Metro-North to rate various aspects of railroad service. There were 39 service-related questions asked of the customers. Customers used the following index scale for their rating.
    - A rating of 1, 2, or 3 means they are "not satisfied" with performance in that area.
    - A rating of 4, 5, 6, or 7 means they are "satisfied" with performance in that area.
    - A rating of 8, 9 or 10 means they are "very satisfied" with performance in that area.

Copy of the distributed questionnaire is included in Appendix M.

A. Customer Satisfaction Analysis (Minority Equity)

Customer satisfaction responses, predicated on the race identified by each respondent, were compared between the defined minority and non-minority customers. (Refer to Appendix A for detailed findings.) The results of this statistical comparison (t-test) are shown below:

Please note that this table reflects the overall index response received by minority status.

	MINORITY	NON-MINORITY
Average Customer Rating Index	7.34	7.11
Variance	0.41	0.57

Using a two-tailed test of hypothesis with a 5% error (95% confidence), the resulting *t*-statistic = +1.43. The *t*-critical values are +/- 1.99. Since +1.43 > -1.99 and < +1.99, it can be concluded that there is no statistically significant difference between minority and non-minority customer satisfaction.

II. Transit Travel Time and Cost Analyses

The analyses shown here were derived from the latest Customer Travel/Satisfaction Survey, June 2010, emphasizing a customer-based analysis for minority/non-minority comparisons. From the survey, which represented actual MNR customers, (all time periods) there was a total of 789 non-minority and 166 minority responses for trips originating in Connecticut. Also, these analyses made use of information concerning fare media purchased, as reported in the Customer Travel/Satisfaction Survey.

A. Travel Time and Cost Analyses (Minority Equity)

The results of these statistical comparisons (refer to summary table in Appendix B), including the specific assumptions made are shown below. However, a general assumption included a wait for a train at one-half the scheduled interval.

Travel Time Analysis

The latest Customer Travel/Satisfaction Survey was used (refer to Appendix C for detailed findings). The results of this statistical comparison (t-test) are shown below:

	MINORITY	NON-MINORITY
Average Total Travel Time (mins)	78.3	82.1
Variance	717.7	541.1

Using a two-tailed test of hypothesis with a 5% error (95% confidence), the resulting *t*-statistic = -1.68. The *t*-critical values are +/- 1.97. Since -1.68 > -1.97 and <+1.97, it can be concluded that there is no statistical difference between minority and non-minority average total travel times for trips beginning in Connecticut.

Transfer Analysis per Trip

The latest Customer Travel/Satisfaction Survey was used (refer to Appendix D for detailed findings). The results of this statistical comparison (t-test) are shown below:

	MINORITY	NON-MINORITY
Average Number of Transfers	0.108	0.074
Variance	0.097	0.071

Using a two-tailed test of hypothesis with a 5% error (95% confidence), the resulting *t*-statistic = +1.34. The *t*-critical values are +/- 1.97. Since 1.34 > -1.97 and < +1.97, it can be concluded that there is no statistically significant difference between minority and non-minority average use of transfers.

Cost per Trip Analysis

The latest Customer Travel/Satisfaction Survey, with respect to all responses (includes all time periods surveyed) regarding fare media, was used. This survey is customer based. The results of this statistical comparison (chi-square) are shown below (refer to Appendix E for detailed findings):

	MINORITY	NON-MINORITY	TOTAL
Discounted Media (Respondents)	74	375	449
Non-Discounted Media (Respondents)	92	414	506
Total	166	789	955

Using a 5% error (95% confidence) with 1 degree of freedom, the resulting critical chi-square value = 3.841. The chi-square test statistic = 0.479. Since 0.479 < 3.841, there is no statistically significant difference between minority and non-minority use of fare media.

Note: For the purpose of this equity analysis only monthly passes were considered as discounted media, all other fare media was considered to be non-discounted media.

Trip Cost per Mile Analysis

The latest Customer Travel/Satisfaction Survey, was used in conjunction with MNR's Spring 2010 fare structure (refer to Appendix F for detailed findings). The results of this statistical comparison (t-test) are shown below:

	MINORITY	NON-MINORITY
Average Trip Cost per Mile ($)	0.39	0.21
Variance	5.32	0.01

Using a two-tailed test of hypothesis with a 5% error (95% confidence), the resulting *t*-statistic = 1.03. The *t*-critical values are +/- 1.97. Since 1.03 > -1.96 and < +1.96, it can be concluded that there is no statistically significant difference between the minority and non-minority average trip cost per mile.

I. Transit Opinion Survey

B. Customer Satisfaction Analysis (Income Equity)

Customer satisfaction responses, predicated on the respondent's origin station, were compared between the defined above poverty and below or at poverty level customers. (Refer to Appendix G for detailed findings.) The results of this statistical comparison (t-test) are shown below:

Please note that this table reflects the overall index response received by income status.

	ABOVE POVERTY	BELOW OR AT POVERTY
Average Customer Rating Index	7.13	7.33
Variance	0.59	0.42

Using a two-tailed test of hypothesis with a 5% error (95% confidence), the resulting *t*-statistic = -1.24. The *t*-critical values are +/- 1.99. Since -1.24 > -1.99 and < +1.99, it can be concluded that there is no statistically significant difference between above poverty and below or at poverty level customer satisfaction.

II. Travel Time and Cost Analyses

The analyses shown here were derived from the latest Customer Travel/Satisfaction Survey, June 2010, emphasizing a customer response/origin station-based above poverty and below or at poverty level comparison. From our survey, which represented actual MNR customers (all time periods), there were over 700 above poverty level and over 300 below or at

poverty level income responses from trips originating in Connecticut. Also, these analyses made use of information concerning fare media purchased as reported in the Customer Travel/Satisfaction Survey.

B. Travel Time and Cost Analyses (Income Equity)

The results of these statistical comparisons (refer to Appendix H for detailed findings), including the specific assumptions made are shown below. However, a general assumption included: a wait for a train at one-half the scheduled interval.

Travel Time Analysis

The latest Customer Travel/Satisfaction Survey was used (refer to Appendix I for detailed findings). The results of this statistical comparison (t-test) are shown below:
-

	ABOVE POVERTY	BELOW OR AT POVERTY
Average Total Travel Time (mins)	81.0	83.1
Variance	386.7	1008.1

Using a two-tailed test of hypothesis with a 5% error (95% confidence), the resulting *t*-statistic = -1.09. The *t*-critical values are +/- 1.97. Since -1.09 > -1.97 and < +1.97, it can be concluded that there is no statistically significant difference between above poverty and below or at poverty level average total travel time.

Transfer Analysis per Trip

The latest Customer Travel/Satisfaction Survey was used (refer to Appendix J for detailed findings). The results of this statistical comparison (t-test) are shown below:

	ABOVE POVERTY	BELOW OR AT POVERTY
Average Number of Transfers	0.068	0.097
Variance	0.063	0.094

Using a two-tailed test of hypothesis with a 5% error (95% confidence), the resulting *t*-statistic = -1.51. The *t*-critical values are +/- 1.96. Since -1.51 > -1.96 and < +1.96, it can be concluded that there is no statistically significant difference between above poverty and below or at poverty level average use of transfers.

Cost per Trip Analysis

The latest Customer Travel/Satisfaction Survey, with respect to all responses (includes all time periods surveyed) regarding fare media, was used. This survey is customer/origin station based. The results of this statistical comparison (chi-square) are shown below (refer to Appendix K for detailed findings):

	ABOVE POVERTY	BELOW OR AT POVERTY	TOTAL
Discounted Media (Respondents)	119	364	483
Non-Discounted Media (Respondents)	200	346	546
Total	319	710	1029

Using a 5% error (95% confidence) with 1 degree of freedom, the resulting critical chi-square value = 3.841. The chi-square test statistic = 17.231. Since 17.231 > 3.841, there is a statistical difference between below or at poverty level and above poverty level use of fare media, with the above poverty level population more likely to use the monthly pass. Although the monthly pass is most economical if you are a frequent rider, it does require the highest initial outlay. This expensive lump-sum cost very likely deters those on more restrictive budgets, especially given the most recent hard economic times.

Note: For the purpose of this equity analysis only monthly passes were considered as discounted media, all other fare media was considered to be non-discounted media.

Trip Cost per Mile Analysis

The latest Customer Travel/Satisfaction Survey, was used in conjunction with MNR's Spring 2010 fare structure (refer to Appendix L for detailed findings). The results of this statistical comparison (t-test) are shown below:

	ABOVE POVERTY	BELOW OR AT POVERTY
Average Trip Cost per Mile ($)	0.25	0.22
Variance	1.25	0.02

Using a two-tailed test of hypothesis with a 5% error (95% confidence), the resulting *t*-statistic = +0.70. The *t*-critical values are +/- 1.96. Since 0.70 > -1.96 and < +1.96, it can be concluded that there is no statistically significant difference between the above poverty and below or at poverty level average trip cost per mile.

The Appendices that follow that are referenced in the report are quite voluminous and will be posted on the CTDOT website but will not be loaded into TEAM, except for Appendix M - Survey.

APPENDIX M

Section XIV – Statewide Transportation Planning and Public Involvement Procedures

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.

A) The Statewide Long-Range Planning Process

Under the 23 CFR 450 & 49 CFR 613 is a USDOT regulation: "Planning Assistance and Standards" (October 28, 1993, unless otherwise noted).

USDOT 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 Procedures (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:

<u>Solicitation of Public Input Prior to the Development of a Draft LRP</u>

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 accessible to people with disabilities. 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 seniors, people with disabilities, 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 to ensure that individuals of low income and minority community having meaningful access and are involved in the decision making process

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. 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, interested parties and businesses that have expressed interest in the transportation planning process.

The interested parties to which STIP 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 seniors, people with disabilities, 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 STIP mailing list and other appropriate individuals and groups that the STIP staff members become aware of to ensure that individuals of low income and minority community having meaningful access and are involved in the decision making process. 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 accessible to people with disabilities. 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 considered, final version of the STIP is prepared and submitted to the USDOT 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 CRF 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, and people with disabilities, 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 USDOT when requesting approval. Once approved by the USDOT, 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 Ill). For projects requiring an EIS or EA, the Department's Office of Environmental Planning will coordinate with the Department's Office of Contract Compliance to ensure that Title VI requirements are satisfied. The Office of Contract Compliance will review the environmental documents to assure that a Title VI assessment has been performed and will provide feedback to the Office of Policy and Planning as determined necessary. 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 Ill) - 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 people with disabilities. 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.

Equity Assessment

Project-Level Assessments. CT DOT already employs procedures at the 'project planning level' to determine the likely impacts of projects on low-income and minority populations. These project-level assessments are intended to ensure that we do not create a disproportionate burden or adverse impact on low-income and minority communities.

Program-Level: Community Outreach. At the broader program level, CT DOT employs special community outreach procedures to ensure that low-income and minority communities have the opportunity to participate in the development of the STIP and LRP. This input is valuable, and helps shape policies and plan recommendations. However, it does not provide a comprehensive or statewide assessment of the equity impacts of our key planning documents – the STIP and LRP.

Program-Level: Equity Assessments. CT DOT is now in the process of developing equity analysis tools to assess the broader and cumulative impacts of our statewide program of projects. These special equity assessment tools will be developed for both the STIP and LRP. The goal is to ensure that our statewide transportation planning and programming process is not discriminatory toward minority and low income communities. The special equity assessment procedures will include the following:

- *Equity Assessment Chapter*. An equity assessment chapter or section will be added to both the STIP and LRP.

- *Quantitative Assessments*. A quantitative assessment methodology will be developed to analyze the distribution of projects and project funding. The methodology will be based on the general procedures identified below.

    - Identify target areas throughout the state using the 2010 census data. These target areas will identify neighborhoods where there are large concentrations of low-income or minority populations.

    - Locate these target areas on a statewide map.

    - Locate all projects on a statewide map.

    - Compare the distribution of projects and/or project funds to determine if there is an equitable distribution of projects and funds among low-income, minority, and general populations in the state.

    - The quantitative assessment will be done both for the highway program and the transit program.

- *Qualitative Assessments*. Qualitative assessments will also be done to address issues or assess policies and programs that cannot be adequately assessed with quantitative methods. These qualitative assessments might include special sessions with low-income or minority organizations to solicit their assessment of DOT proposals and also to identify transportation issues of special importance to these communities.

The goal of this assessment will be to ensure an equitable process is used that does not result in a distribution of burdens and benefits that is discriminatory.

Public Involvement Procedures

The Department has established a proactive, public involvement process that is accessible to the public and identifies and addresses transportation-related issues early in the project development process. The department has an approved Public Involvement Procedures (PIP) document which includes all aspects of public involvement for the Department. This was developed in accordance with 23 CFR 450.210 and 23CFR 771.111(h)(1) and approved by USDOT in December 2009.

INTRODUCTION

Federal Statewide Planning and Metropolitan Planning Regulations (23 CFR Part 450 and 500 & 49 CFR Part 613, February 14, 2007) require that state transportation agencies and Metropolitan Planning Organizations (MPOs) develop public involvement procedures. Pursuant to these regulations, the Connecticut Department of Transportation (Department) has established a proactive, public involvement process that is accessible to the public and identifies and addresses transportation-related issues early in the project development process. This process provides complete information, timely public notice, full public access to key decisions, and supports early and continuing involvement of the public in developing planning documents and transportation improvement programs. This process also minimizes duplication of public involvement efforts and meets the needs of the public and resource and regulatory agencies to provide early and continuing input into the project development process.

The Department's Mission Statement, Vision and Values; Public Involvement Policy and the procedures that the Department follows to carry out this policy are set forth and described in this draft document titled, *The Connecticut Department of Transportation's Public Involvement Procedures*. The federal and state mandates that pertain to public involvement are identified and discussed in Chapter I, the public involvement procedures that the Department uses when developing plans and undertaking various phases of projects and studies are discussed in the other chapters. The public involvement procedures that the Department follows when developing plans and conducting studies are discussed in Chapter 2, the public involvement procedures that the Department follows during the environmental phase of projects are discussed in Chapter 3, the procedures to be followed during the survey, design and rights-of-way phases are discussed in Chapter 4, the procedures that are to be followed during the construction, operations and maintenance phases of transportation projects are discussed in Chapter 5, and the Department's procedures for conducting public meetings and public hearings are explained in Chapter 6.

Connecticut Department of Transportation's

Mission Statement, Vision & Values

OUR MISSION:

The mission of the Connecticut Department of Transportation is to provide a safe and efficient intermodal transportation network that improves the quality of life and promotes economic vitality for the State and the region.

OUR VISION:

The vision of the Department of Transportation is to lead, inspire and motivate a progressive, responsive team, striving to exceed customer expectations.

OUR VALUES:

- ***Measurable Results:*** *We will endeavor to utilize the latest technology and preserve the integrity of our current assets to provide a safe, efficient, integrated, multimodal, transportation system that offers options for mobility.*

- ***Customer Service:*** *We are committed to consulting with our internal and external stakeholders in an open and transparent decision-making process; and to being responsive by providing timely information on services and programs.*

- ***Quality of Life:*** *We will strive to maintain and enhance the quality of life in the State and the region by maintaining the character of our communities, supporting responsible growth, and by enhancing and being sensitive to the environment.*

- ***Accountability & Integrity:*** *We will prudently manage and invest the human and financial resources entrusted to the Department using sound criteria and efficient, cost-effective methods that put safety and preservation first.*

- ***Excellence:*** *We will demand excellence in all we do to fulfill our mission by being solution-oriented and focused on project delivery.*

We will continuously re-evaluate our mission, values, performance and priorities to ensure that the Department and its employees are innovative and responsive to changing needs.

Connecticut Department of Transportation's

Public Involvement Policy

2009 Public Outreach Policy Statement

It is the policy of the Connecticut Department of Transportation to actively engage in early and continuous public involvement efforts throughout all phases of project planning, development, implementation and operation.

1) The Department shall provide timely information about transportation issues and processes to the communities affected by transportation plans, programs and projects, particularly with respect to communities affected by Title VI, Executive Order 12898 (Environmental Justice), and individuals with limited English proficiency.

2) The Department shall further provide reasonable public access to information used in the development of plans and projects, appropriate notice of public involvement activities and time for public review and comment at key decision points.

3) The Department shall employ a process for demonstrating explicit consideration and response to public input.

The Department's public outreach efforts shall include a process for seeking out and considering the needs of those traditionally underserved by existing transportation systems, such as low income and minority households, and shall be periodically reviewed for their effectiveness.

CHAPTER 1: FEDERAL & STATE MANDATES

Federal and State Laws, Regulations & Executive Orders

State transportation agencies must comply with the public outreach provisions of the following federal regulations and executive orders to use federal money to pay for transportation projects and services or require a federal approval or permit:

- Statewide and Metropolitan Planning. 23 *Code of Federal Regulations* (CFR) Parts 450 and 500 and 49 CFR Part 613, February 14, 2007;
- Environmental Impact and Related procedures and Section 4(f). 23 *Code of Federal Regulations* (CFR) Parts 771 and 774; October 16, 2001;
- Protection of Historic Properties. 36 *Code of Federal Regulations* (CFR) part 800.
- Air Quality Conformity. 40 CFR Part 51, November 24, 1993;
- Management and Monitoring Systems. 23 CFR 500, December 1, 1993;
- *Title VI of the Civil Rights Act of 1964*;
- *Environmental Justice Executive Order 12898*; and
- *FHWA Work Zone Safety and Mobility Rule 23 CFR 630 subpart J.*

These federal regulations require:

- Early and continuing public involvement opportunities during all stages of the planning and programming process,
- Timely information about transportation issues and processes to the community affected by transportation plans, programs and projects,
- Reasonable public access to information used in the development of the plans and projects,
- Adequate public notice of public involvement activities and time for public review

  and comment at key decision points,
- A process for demonstrating explicit consideration and response to public input,
- A process for seeking out and considering the needs of those traditionally undeserved by existing transportation systems, such as low-income and minority households, and
- Periodic review of the effectiveness of the public involvement process.

The Statewide Planning and Metropolitan Planning Regulations (23 CFR Part 450 and 500 & 49 CFR Part 613, February 14, 2007) require that the Department and Metropolitan Planning Organizations (MPOs) develop public involvement procedures. These regulations require that the State carry out a continuing, comprehensive, and intermodal statewide transportation planning process to involve agencies and the public in efforts to define the design concept and scope of major transportation investments.

The regulations pertaining to Air Quality Conformity (40 CFR Part 51, November 24, 1993) and the Management and Monitoring Systems (23 CFR 500, December 1, 1993) mandate that the public involvement

process for planning serve as the vehicle for public input to air-quality conformity determinations and the results of the management systems.

The Department's public involvement procedures must also meet the following public involvement requirements: 23 U.S.C. 128, Executive Orders 12898, 11988, and 11990, 36 CFR 800, 49 CFR 622, 33 CFR 115.60 and 33 CRF 325 and 327. Section 6001 of P.L. 109 – 59, *The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users* (SAFETEA-LU) amended Sections 134 and 135 of Title 23, U.S.C. This section includes the requirements concerning the opportunity for comment by the public on both regional and state long-range transportation plans (LRPs) and Transportation Improvement Programs (TIPs). Section 6002 of SAFETEA-LU added Section 139 of Title 23, U.S.C., which requires opportunities for public involvement during development of the purpose and need for a project as well as for the Alternatives Analysis during the environmental review process. These procedures are consistent with the Council on Environmental Quality's (CEQ) regulations for implementing the *National Environmental Policy Act* (NEPA) (40 CFR, Parts 1500-1508), the Federal Highway Administration's internal operating procedure required by NEPA (23 CFR 771, "Environmental Impact and Related Procedures"), and Sec 22a-1b of the Connecticut State Statues which covers the *Connecticut Environmental Policy Act* (CEPA) process.

Compliance with all of the provisions of FHWA Work Zone Safety and Mobility Rule is required as of October 12, 2007. This Rule identifies very specific requirements for public involvement in the planning, design and construction phases of a project, as well as during the subsequent operation of the facility.

Title VI of the Civil Rights Act of 1964 and the *Environmental Justice Executive Order 12898* emphasize and require the integration of public involvement in planning and design when minority, low-income, and tribal communities may be affected by a federally funded action. Adequate efforts must be utilized to reach and involve low income, minority, disabled or Limited English Proficient Populations during the planning process. A systematic and consistent approach to engaging those impacted (representing diverse cultural and economic backgrounds) is required by the tenets of environmental justice. Federal requirements for meeting these standards obligate recipients of federal funds to collect data about beneficiaries, to analyze that data, eliminate discrimination when it is found, and to take affirmative measures to ensure nondiscrimination (see 49CFR21.5(b)(7), 21.9(b) and 23CFR200.9(b)(4) and 200.9(b)(14)). Limited English Proficiency (LEP) requirements also mandate that recipients provide meaningful access to the population relative to what is provided to populations that are proficient in English.

Stakeholder Involvement

The Department will seek to involve transportation stakeholders in the development of policies and strategies. Such efforts will focus on specific transportation issues and will strive to include various interested parties; including intermodal transportation representatives, environmental organizations, academic advisors, economic development interests and representatives of other state agencies. The Department may form advisory committees of various sorts as appropriate which could include the following stakeholders:

- federal officials,
- other state officials (e.g., Department of Environmental Protection (DEP), or the State Historic Preservation Office (SHPO)),
- local elected officials,
- town engineers/planners,
- regional officials,
- Regional planning organizations,

- Transit districts,
- pre-existing special interest groups or advocacy groups (e.g., Sierra Club, Commuter Rail Council, etc.),
- *ad hoc* groups created for a specific project,
- abutting or nearby property owners,
- the traveling public,
- civic associations, business or economic development interests, and
- any other interested parties.

The Department will update the statewide LRP and STIP in consultation with governments of metropolitan and non-metropolitan areas, federally recognized Indian tribal governments and the Secretary of the Interior, transit agencies, local agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation, and others who have an impact on the transportation system. When updating the statewide LRP and STIP, the Department will provide citizens, affected public agencies, representatives of transportation agency employees, freight shippers, private providers of transportation, representatives of users of public transit, providers of freight transportation services, representatives of users of pedestrian walkways and bicycle transportation facilities, the disabled, and other interested parties with a reasonable opportunity to comment on the proposed plan.
Tribal governments will be actively solicited to participate in the development of State plans and programs as independent government bodies. To further ensure their participation the Department will provide the following:

- Early involvement
- Timely information exchange
- Adequate notice
- Consideration of input

CHAPTER 2: PUBLIC INVOLVEMENT DURING A STUDY OR DEVELOPMENT OF TRANSPORTATION PLANNING DOCUMENTS

Public Involvement Procedures for the Statewide Long-Range Transportation Plan
The statewide long-range transportation plan (LRP), which is required by Title 23 USC, Section 135(e) as amended by SAFETEA-LU and TEA-21, is the federally recognized transportation plan for the State of Connecticut. It is a policy document that is intended to present a long-term, intermodal vision of the state's transportation system and serve as a framework for preparing future, more project-specific plans such as the Department's federally mandated statewide transportation improvement program (STIP) and state-mandated master transportation plan (MTP). 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. Free Language Assistance will be provided to the public upon request.

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 posting on the calendar includes 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 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.

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, statements at monthly/quarterly meetings of various organizations, 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 2009 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 and hard copies and/or electronic copies are sent to the State Library for distribution to designated depository libraries and to the Department's 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.

Public Involvement Procedures for the Statewide Transportation Improvement Program

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.

Each MPO is asked to coordinate a public review of its Transportation Improvement Program (TIP) with a public review of the Department's STIP. The Department's staff attends all MPO informational meetings on the TIP/STIP and is available to receive comments and answer questions. Two informational meetings on the STIP are held at the Department's headquarters. One meeting is scheduled during the day with the second meeting is scheduled at night to accommodate individuals with 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.

The draft STIP is made available for public review and comment for a period of at least 30 days. After review and consideration of all public comments, a final version of the STIP is prepared and submitted to the USDOT 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 is placed on the Department's web page.

Public Involvement Procedures for Air Quality Conformity Analysis

In Connecticut, the Department is responsible for performing an Air Quality Conformity analysis for all areas of the State. The Department will conduct an Air Quality Conformity analysis when new TIPs are developed, when MPOs develop new Long-Range Transportation Plans (LRP) and when an amendment to a TIP is needed. Interagency coordination will occur as specified in the Air Quality Conformity analysis procedures document. Once a new analysis is completed, the document and back-up information is sent to each MPO for its review and for the MPO to provide an opportunity for the public to review and comment on the document.

Each MPO will follow their public involvement procedures to notify the public that a new Air Quality Conformity analysis has been prepared. This document will be made available for a 30-day comment period, and a public meeting on this document will be held in conjunction with the public meeting on MPO's TIP and/or LRP. Copies of documents pertaining to an MPO's planning region will be made available in the MPO's office for review by the general public. The public may also attend an MPO's monthly meeting to deliver comments before the MPO's Policy Board acts on the Air Quality Conformity determination. All comments received on an Air Quality Conformity document will be incorporated by reference in the MPO's approval submittal to the CTDOT who, in turn will forward to USDOT.

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. Therefore, the Department relies on MPOs to seek public involvement in the development of their comprehensive regional long-range transportation plans (LRP) and TIPs.

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, 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 CRF 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.

Public Involvement Procedures for Amending TIPs and the STIP

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 USDOT requesting approval. Once approved by the USDOT the updated STIP is posted on the Department's web page.

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.

Public Involvement Procedures for Planning Studies

During the scoping of planning studies early coordination is done with the affected Regional Planning Organizations (RPOs) and towns to determine the amount of public outreach that will be required for the study. A description of this outreach effort is included in the scope of services for the study to ensure that the public is kept informed and has ample opportunity to relay their concerns and questions on the study. These outreach efforts typically consist of the establishment of an Advisory Committee (AC) or a Stakeholders Group (SG). Public Informational Meetings (PIM), study web sites and distribution of study documents for public review.

ACs are established so that their memberships represent all the stakeholder groups in the study. This representation typically consists of other State and Federal agencies (e.g. OPM, DEP, DECD, FHWA, FTA, FAA), municipalities, RPOs and public representation, as well as other stakeholders. This membership is not "set in stone" and can change as the study progresses. The AC is a critical piece of the study, as its members are typically charged with the sharing of information with the stakeholder groups they represent and bringing the groups' concerns to the attention of those conducting the study.

Public Informational Meetings (PIM) are held as appropriate throughout the study process to relay information to the general public and solicit their input to the study. The PIM also offers a forum for the Department to learn and respond to community concerns. These meetings are typically held in an open house format to allow individuals to speak one–on–one with Department personnel regarding their concerns and questions with respect to the study.
Web sites are used to disseminate information to the public in an easy and cost effective manner. Depending on the size and scope of the study, a study web site may be created for the sole purpose of providing information to and soliciting comments from all stakeholders. It also offers a way to update interested parties on the status of study activities and notify them of upcoming meetings. Once studies are completed the final reports are posted on the Department's web site for future reference.

Hard copies of study documents, working papers, draft and final documents are made available at town halls, RPOs' offices, local public libraries and at the Department's headquarters in Newington, Connecticut. This provides the public with multiple options to access and view the study reports.

CHAPTER 3: PUBLIC INVOLVEMENT IN THE ENVIRONMENTAL PHASE OF PROJECTS

Public Outreach under the National Environmental Policy Act *and the* Connecticut Environmental Policy Act

The transportation planning process is continuous, and public involvement should begin early and continue throughout the duration of the project. Public outreach should be initiated at the onset of the development of any proposed action, prior to conducting detailed analysis. The extent of public outreach for each proposed action depends on the magnitude of the proposed action and the potential effects a proposed action may have upon the environment. The type of environmental documentation required will also dictate the requirements for public outreach in accordance with the *National Environmental Policy Act* (NEPA) and the *Connecticut Environmental Policy Act* (CEPA).

During the preliminary stages, each proposed transportation project undergoes an internal environmental review process to determine the type of environmental documentation required for the project. This decision is determined by the funding source and the level of potential impact to the environment as a result of the project. If a project is being funded in whole or in part with federal monies, or if the project requires a federal permit, one of three levels of environmental documentation must be prepared under NEPA. The environmental review process determines if a project shall require a 1) Federal Environmental Impact Statement (EIS), 2) Categorical Exclusion (CE), or 3) Federal Environmental Assessment (EA). It should be noted that a Federal

EA is a decision making tool to determine if a project warrants a Finding of No Significant Impact (FONSI), or if an EIS should be prepared. If the project is state-funded only, criteria set forth in the Department's Environmental Classification Document (ECD) will determine whether or not a State Environmental Impact Evaluation (EIE) shall be prepared under CEPA. For projects that are funded with both federal and state funds, a single environmental document (e.g., EIS/EIE or EA/EIE) is prepared that addresses both NEPA and CEPA requirements.

NEPA Documentation

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:

- Coordination of public involvement activities and public hearings with the entire NEPA process.

Early and continuing opportunities during project development for the public to be involved in the identification of social, economic, and environmental impacts, as well as impacts associated with relocation of individuals, groups, or institutions.

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 which requires significant amounts of right-of-way, substantially changes the layout or functions of connecting roadways or of the facility being improved, has a substantial adverse impact on abutting property, otherwise has a significant social, economic, environmental or other effect, or for which the USDOT determines that a public hearing is in the public interest.

Reasonable notice to the public of either a public hearing or the opportunity for a public hearing if one is required. Such notice will indicate the availability of explanatory information. The notice shall also provide information required to comply with public involvement requirements of other laws, Executive orders, and regulations.

Explanation at the public hearing of the following information, as appropriate:

- 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 right-of-way acquisition process; and
- The Department's procedures for receiving both oral and written comments from the public.

Submission to the USDOT of a transcript of each public hearing and a certification that a required hearing or hearing opportunity was offered. The transcript will be accompanied by copies of all written statements from the public, both submitted at the public hearing or during an announced period after the public hearing.

NEPA documentation is required for each transportation project that is funded with federal monies. The three classes of actions which prescribe the level of NEPA documentation and public involvement required for each project are as follows:

- Class I – Environmental Impact Statement (EIS)
- Class II – Categorical Exclusion (CE)
- Class III – Environmental Assessment (EA)

Environmental Impact Statement (EIS)

An EIS is required for actions that significantly affect the environment. When the decision to prepare an EIS is made, a Notice of Intent (40 CFR 1508.22) is issued for publication in the *Federal Register*, beginning the scoping process. The scoping process is used to identify a range of alternatives, to determine the significant issues to be addressed in the EIS, and to foster public outreach. Early in the process a public scoping meeting shall be held in the project area. The Department shall publish a legal notice in area newspapers two weeks prior to the public scoping meeting to inform the public of the date, time, and location of the meeting.
The public will be allowed to submit comments to the Department for a period of thirty days following the public scoping meeting. Section 6002 of SAFETEA-LU [23 U.S.C. 139(g)] requires a Coordination Plan for coordinating public and agency participation in and comment on the environmental review process for a project or category of projects.

If the project incorporates any state funding, a joint Federal EIS/Connecticut EIE shall be prepared.

Draft EIS
Once a draft EIS is prepared and published, the document must be filed with the Environmental Protection Agency (EPA) and made available to the public no later than the date which it is filed with the EPA. At this time, the EPA will publish a notice of availability of the draft document in the *Federal Register* to establish a period of not less than 45 days for public comment on the draft EIS. Additionally, 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 populations with limited English proficiency) in area newspapers to inform the public of the public hearing and where the document is available for inspection. At least one public hearing will be held for all transportation projects which involve the development of an EIS. The draft EIS shall be transmitted to public officials, interest groups, and members of the public known to have an interest in the proposed action or the draft EIS. Additionally, the draft EIS shall be available for public inspection at relevant town clerks' offices, public libraries, and regional planning offices, as well as at the Department, and the USDOT office as well as on the Department's web site for a minimum of fifteen days in advance of the public hearing. Therefore, both the notice in the *Federal Register* and in the newspaper(s) shall appear at least fifteen days in advance of the hearing; the public will have at least thirty days to submit comments following the public hearing.

Final EIS
After circulation of the draft EIS and consideration of all comments received, a final EIS shall be prepared. The final EIS shall be transmitted to any persons that made substantive comments on the draft EIS or requested a copy, no later than the time that the document is filed with the EPA. Once the final EIS is filed with the EPA, the Department shall publish a notice of availability of the document in local newspapers and make the final EIS available for public review at relevant town clerks' offices, public libraries, as well as the Department, and on the Department's web site. After the final EIS is filed with the EPA and the notice of availability of the final EIS is published in the *Federal Register*, the lead federal agency will complete and sign a record of decision (ROD) no sooner than thirty days after the publication of the final EIS notice or ninety days after the publication of the notice of the draft EIS, whichever is later. A ROD is a NEPA compliance document that provides the basis for the decision made, describes the environmental factors considered, the preferred plan, and the alternatives considered in the EIS and summarizes any mitigation measures that will be incorporated into the project.

Categorical Exclusion (CE)
A CE is required for actions that do not individually or cumulatively have a significant affect on the environment. For proposed actions classified as CE's under NEPA and/or requiring no Environmental Impact Evaluation under CEPA, informing the public of the anticipated activity can be accomplished through the municipality and media strategies, such as posting information on the Department's web site, and publishing notices of anticipated activities in local media. The Department may also hold a public information meeting or public hearings.

Information posted on the Department's web site and in local media shall include a description of the proposed activity, an anticipated schedule for construction, and a Department contact for additional information. A notice may also be published in languages other than English, if it is determined that the project will affect populations with limited English proficiency. Public information meetings and public hearings may be held during the Survey / Design / Rights-Of- Way Phases of projects to advise the public of the associated CE process.

Environmental Assessment (EA)

Under NEPA, an EA is prepared for each action that is not a CE, yet does not clearly require the preparation of an EIS, or where an EA would assist in determining if an EIS is required. An EA will either result in the preparation of an EIS or a FONSI.

The vast majority of projects are funded with both federal and State funds. If a project requires an EA and uses any state funds, the EA is also published as a joint state EIE under CEPA. Although there is no need to circulate an EA for public comment under federal regulations, the Department takes the responsibility of circulating the joint EA/EIE for public comment under CEPA and incorporates the public comments under NEPA.

The draft EA/EIE must be made available for public inspection at the appropriate federal regional office, the Department and on the Department's web site. Additionally, the draft EA may be made available at relevant town clerks' offices, public libraries, and regional planning offices. A notice of availability of the draft EA, briefly describing the action and its impacts, shall be sent by the Department to the affected units of federal, state, and local governments.

USDOT regulation 23 CFR 771.111(h)(2)(iii) requires 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 which requires significant amounts of right-of-way, substantially changes the layout or functions of connecting roadways or of the facility being improved, has a substantial adverse impact on abutting property, otherwise has a significant social, economic, environmental or other effect, or for which the USDOT determines that a public hearing is in the public interest. However, it is the practice of the Department to hold a public hearing for every federal EA, regardless of whether the project meets the above criteria.

When a public hearing is held, the draft EA must be made available to the public at the hearing and for a minimum of 15 days in advance of the public hearing at the locations listed above. The notice of the public hearing shall be placed in local newspapers and shall announce the availability of the draft EA and where it may be obtained and reviewed. Comments must be submitted to the Department within 30 days of the availability of the draft EA.

If no significant impacts are identified, the Department shall recommend a FONSI. Once a FONSI is expected to be issued, copies of the EA shall be made available for public review for a minimum of 30 days before the final decision to prepare a FONSI can be approved. This public availability shall be announced by a notice in newspapers similar to a public hearing notice. After a FONSI has been issued, by the lead federal agency, copies shall be sent to the affected units of federal, state, and local governments and the document shall be available upon public request.

If it is determined that the level of impacts warrants an EIS, then the procedures previously outlined for the preparation of an EIS shall be followed.

Reevaluations

If the NEPA process is complete and 1) three years have passed since any federal action has taken place; or 2) the project scope has changed, as required by 23 CFR 771.129, the USDOT, in cooperation with the Department, shall reevaluate the project's environmental documents. This reevaluation will determine whether changes in the project or new information after the NEPA process is complete warrant additional public involvement. If a project is funded by another lead federal agency such as the FAA, coordination shall take place with that agency to determine the reevaluation process. Reevaluations do not have a public involvement

requirement. If it is determined that the NEPA process needs to be re-opened, public involvement requirements would apply according to the type of environmental document.

CEPA Documentation

The purpose of CEPA is to identify and evaluate the impacts of proposed State-funded actions that could have a potential to significantly impact the environment. If the project is State-funded, criteria set forth in the Department's Environmental Classification Document (ECD) will determine whether or not a State Environmental Impact Evaluation (EIE) shall be prepared under CEPA.

Scoping

Before preparing an EIE, the Department shall conduct an early public scoping process to help ensure that relevant environmental concerns are considered in an adequate and timely manner.

The Department shall achieve this by publishing a scoping notice in the *Environmental Monitor* to solicit comments from the public and other State agencies regarding the scope of alternatives and environmental impacts that should be considered for further study. As required under CEPA, the *Environmental Monitor* is the official web site for information on all State funded projects, regardless of which agency is the lead agency on the project. The Department must also publish in the *Environmental Monitor* a notice of the opportunity to petition for a public scoping meeting, or the date, time and location of any such meeting already scheduled. Members of the public and any interested State agency representatives may submit comments on the nature and extent of any environmental impacts of the proposed action during the thirty days following the publication of the scoping notice in the *Environmental Monitor*, or within at least fourteen days following the public scoping meeting, if held. A public scoping meeting shall be held at the discretion of the Department or if twenty-five persons or an association having not less than twenty-five persons requests such a meeting within ten days of the publication of the notice in the *Environmental Monitor*. The public scoping meeting shall be held at least ten days after the scoping notice appears in the *Environmental Monitor* and shall provide the following:

- a description of the proposed action
- a description of the purpose and need of the proposed action
- a list of the criteria for a site for the proposed action
- a list of potential sites for the proposed action
- the resources of any proposed site for the proposed action
- the environmental limitations of such sites
- potential alternatives to the proposed action; and
- any additional information the Department deems necessary

Any comments or information received during the early scoping process must be addressed in the EIE, and any substantive issues raised must be evaluated.

Once a draft EIE is prepared, the document is circulated to other State agencies, and is made available for public review at the office of the local town clerk as well as the local and state library, the RPOs and the Department. The Department must publish a notice of the availability of the EIE in a general circulation newspaper in the affected town at least once a week for three consecutive weeks, as well as in the *Environmental Monitor*. The 45-day public review and comment period begins on the day that the notice is published in the *Environmental Monitor*. These notices can also announce a public hearing if the Department has scheduled one; however, a public hearing is required if twenty-five persons or an association having not

less than twenty-five persons requests a public hearing within ten days of the publication of the EIE availability notice in the *Environmental Monitor*. A summary of public comments and the public hearing record is included in the final EIE as well as the Record of Decision (ROD).

Consultation under Section 106 of the National Historic Preservation Act

Section 106 of the National Historic Preservation Act of 1966 is intended to maintain a balance between preservation concerns and federal undertakings. Section 106 requires federal agencies to factor the impacts their projects will have on historic properties and cultural resources. Consultation takes place between the federal agency and either the State Historic Preservation Office (SHPO) representing the interests of the state for historic preservation or a Tribal Historic Preservation Office representing the interests of a federally recognized tribe that has assumed the responsibility of a THPO. Section 106 also allows the Advisory Council on Historic Preservation (ACHP) an opportunity to comment on such projects. (see 36 CFR 800.2 – Participants in the Section 106 Process).

The Section 106 process must be very thorough and comprehensive in order to assure the preservation of historical resources; it includes the cooperation of many different participants.

Public and Other Consultation

Among the participants in the Section 106 consultation process are the general public, local governments, and individuals or organizations that have a demonstrated interest in the federal undertaking. The federal agency official is responsible for providing information to the public and interested parties on the federal action and shall seek and consider the views of the public and other interested parties on the federal action in a manner that reflects the complexity of the undertaking and its effects on historic properties. Public informational meetings on the project will specifically explain the proposed action's affect on historic properties and cultural resources with the public and interested parties given time to address concerns at the meeting and afterward by written comment to the federal or state agency (see 36 CFR 800.2(c)(5) – Additional Consulting Parties).

Section 106 Process

In order to initiate the Section 106 process, the federal agency that initiates an action must determine whether the proposed project is the type of undertaking that could potentially affect historic properties. If the undertaking has no potential to cause effects, there are no further obligations under Section 106. If it is determined, however, that the undertaking has the potential to adversely affect a historic property, further investigation is needed. The Department's cultural resources expert must contact the SHPO or the THPO for consultation. The SHPO will ultimately make one of three possible determinations regarding the entire project's impact on archaeological and historical resources:

- No effect,
- No adverse effect, or
- Adverse effect

During consultation with the SHPO/THPO, public input shall be taken into consideration, as should the involvement of local governments.

Identification of Historic Properties

In order to move forward with the Section 106 process, cultural resources that have the potential to be affected must be identified. A reasonable and good faith effort to carry out appropriate identification efforts, which may include background research, consultation, and site visits, must be made. Efforts to determine identification of these resources are done in consultation with the SHPO/THPO and include:

- Determination and documentation of the Area of Potential Effects (APE) (the area within which an undertaking may cause alterations in the character or use of cultural resources),
- Review of existing information on the historic properties within the area of potential effects, including any data regarding possible cultural resources not yet identified, and

- Requests for information from consultants and other individuals with knowledge of historic properties in the area, and identifying the undertaking's potential effects on cultural resources.

Using the information obtained in the previous three steps, the Department (acting on behalf of the federal agency) in consultation with SHPO shall identify the cultural resources located in the APE. The Office of Environmental Planning (OEP) should also take into account any past planning and research efforts that were done within the area of potential effects. Once these measures are carried out, an evaluation can be made regarding the undertaking and its effect on historic and cultural resources.

Evaluation of Historic Significance

In consultation with the SHPO/THPO, the National Register criteria shall be applied to those properties that have been identified within the area of potential effects, but have not been previously evaluated for eligibility for the National Register of Historic Places (NRHP). The OEP's cultural resources expert can make a recommendation to the SHPO regarding the eligibility of a property for inclusion on the National Register for Section 106 purposes, however only the SHPO can make a final determination on actual inclusion. Criteria for inclusion are as follows:

- The quality of significance in American history, architecture, archaeology, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:
- that are associated with events that have made a significant contribution to the broad patterns or our history; or
- that are associated with the lives of persons significant in our past; or
- that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- that has yielded, or may be likely to yield, information important in prehistory or history.

Once a historic property is identified, it can now be evaluated for effect. If it is determined that that there are some cultural resources present but the undertaking will have no adverse effect on them, documentation of this finding shall be provided. Documentation shall include a description of the undertaking, specifying federal involvement, and its area of potential effects, including graphics such as pictures and maps. Also, a description of the steps taken to identify historic properties, and the basis for determining that no historic properties are present or affected should be included. If it is determined that historic properties are affected by the undertaking, all consulting parties must be notified in order for assessment of the adverse effects.

Assessment of Adverse Effects

An assessment of adverse effects on identified cultural resources based on criteria found in ACHP regulations must be made. An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a cultural resource that qualify that resource for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Examples of adverse effects include, but are not limited to:

- physical destruction or damage,
- restoration or rehabilitation not consistent with the treatment of historic properties,
- removal of a property from its historic location, and
- neglect of a property, causing deterioration.

If the OEP, in consultation with the SHPO/THPO, determines that the undertaking's effects do not meet the criteria of adverse effects, then it shall be documented that no adverse effects are present and the federal agency has fulfilled its obligations under Section 106. However, if it is determined that the undertaking will adversely affect the historic property, the federal agency must attempt to resolve the issue.

Resolution of Adverse Effects

The Department, acting on behalf of the federal agency (USDOT, etc.), must consult with the SHPO/THPO in order to develop alternatives that will avoid, minimize or mitigate the adverse effects on the historic properties. If resolution efforts should stall, or if the two parties are conflicted, the ACHP should be contacted to request assistance in resolving the conflicts. The resulting consultation shall produce a document that includes the following:

- a description of the undertaking, specifying the federal involvement, and its area of potential effects, including visuals, such as maps and photographs;
- a description of the steps taken to identify historic properties;
- a description of the affected historic properties, including information on the characteristics that qualify them for the National Register;
- a description of the undertaking's effects on historic properties;
- an explanation of why the criteria of adverse effect were found applicable or inapplicable, including any conditions or future actions to avoid, minimize or mitigate adverse effects; and
- copies or summaries of any views provided by consulting parties or the public.

This document should be made available for public review and comment; those who wish to express their views regarding resolution of the adverse effects are welcome to do so. Since the federal agency does not maintain a cultural staff, the SHPO evaluates adverse effects, and determines resolution procedures. Resolution of adverse effects generally results in the drafting of a Memorandum of Agreement (MOA), which outlines agreed upon measures that the federal agency will take to avoid, minimize, or mitigate adverse effects. At this point, the federal agency will proceed with its undertaking under the terms named and agreed upon in the MOA.

Once the views of interested persons have been considered and documented, the "finding of no adverse effect" or the MOA can be forwarded to the lead federal agency for approval. The Department's transmittal letter shall document the means employed to solicit public comment, summarize the views of interested persons, and discuss the resolution of any outstanding issues. Once the Section 106 process is completed, the lead federal agency could process the Section 4(f) Evaluation(s) where applicable and conclude the NEPA approval process.

Public Coordination under Section 4(f) of the DOT Act

The U.S. DOT agencies cannot approve the use of land in a significant publicly owned park, recreation area, wildlife or waterfowl refuge, or any significant historic site unless the following conditions apply:

1. There is no feasible and prudent alternative to the use of land.
2. The action includes all possible planning to minimize harm to the property resulting from use.

It is the responsibility of the Office of Environmental Planning in the Bureau of Policy and Planning, in cooperation with the lead federal agency, to determine whether a Section 4(f) resource will be affected by a federally funded transportation project.

Section 4(f) is concerned with the use of significant public lands or historic properties. "Use" denotes an unfavorable impact to, or possession of, a resource recognized under Section 4(f). There are four main types of use considered under Section 4(f). They are:

1. Fee Simple. This type of use is simply Rights-of-Way acquisition of Section 4(f) land. In this case the agency purchases the land, which sustains a permanent impact.
2. Permanent Easement. This type of use does not necessarily result in a permanent change in the landscape.
3. Temporary Easement. This type of use is generally seen during construction. The Section 4(f) land is only used for a fixed amount of time and it is restored to the original condition once it is no longer needed.
4. Constructive. This type of use involves a project that does not physically affect the Section 4(f) resource, but instead is close enough to substantially impair the resource indirectly.

If a Section 4(f) resource cannot be avoided, the mitigation process must begin, and compensation measures must be addressed in order to replace land and facilities with property having comparable attributes to the resource or to enhance the area around a Section 4(f) resource. A Section 4(f) evaluation must address the net impact of all alternatives, including a "no-build" alternative. When referring to the net impact to a resource, the following four characteristics are considered:

1. Size of the 4(f) resource.
2. Location of the 4(f) resource in relation to the entire property.
3. Severity of the usage.
4. Function of the portion of the 4(f) resource being used.

There are three types of Section 4(f) Evaluations that are used, depending on the impact of the respective project. They are as follows:

1. Individual Section 4(f) Evaluation. When it is determined that the impact to the Section 4(f) resource will be significant, an Individual Section 4(f) Evaluation must be approved by the USDOT legal council.
2. Programmatic Section 4(f) Evaluation. This may only be used if project circumstances satisfy all of the conditions for the applicable Nationwide Programmatic 4(f) Evaluation, and when it is determined that the impact will be less significant than that of an individual Section 4(f) Evaluation. These programmatic Section 4(f) Evaluations are prepared in coordination with the USDOT and need only be approved by the Division office.

   It should be noted that there are no programmatic Section 4(f) evaluations with other U.S. DOT agencies. Therefore, individual coordination with all U.S. DOT agencies other than the FHWA must take place if it is determined that projects funded by those agencies have a less significant Section 4(f) impact than that of an individual Section 4(f) evaluation.

3. Section 4(f) De Minimis Findings In August 2005, Section 4(f) legislation was amended to simplify the process and approval of projects that have only De Minimis impacts on Section 4(f) resources. Once it is determined that a Section 4(f) resource qualifies as a De Minimis impact, analysis of avoidance alternatives are not mandatory and the Section 4(f) evaluation process is finalized.

In every project where any type of Section 4(f) Evaluation is required, public notification of the impacts to the Section 4(f) resource and coordination with the owner of the property must take place (see 23 CFR 774.5 -

Coordination). This task is handled by 1) addressing the impacts to the Section 4(f) resource during the project public hearing(s) or public informational meeting(s) and 2) direct coordination with the property owner.

CHAPTER 4: PUBLIC INVOLVEMENT DURING THE SURVEY/DESIGN/RIGHTS-OF-WAY PHASES OF PROJECTS

The Department is responsible for public involvement during the development and implementation phases of projects. Specific procedures for public involvement will vary with the scope and location of the project, as well as with other factors. Such procedures will be governed by the Department's current *Public Involvement Guidance Manual* and the Department's Work Zone Safety and Mobility Policy and Implementation Plan, which are incorporated by reference. Project managers will be aware of the various mandates at various stages of the planning, implementation and operation processes and will fully comply with them.

Once an action has been identified and initiated for design, notification should be made by the sponsoring agency to the general public, of the intent to initiate the action. This notification should include a description of the proposed activity, schedule and a Department contact for additional information.

The public involvement processes shall be proactive and provide complete information, timely public notice, full public access to key decisions, and opportunities for early and continuing involvement. Activities will be consistent with 23 CFR 771. The design of a transportation facility is typically undertaken in stages of completion (i.e. Preliminary Engineering studies, Preliminary Design, Semi-Final Design, and Final Design). The Department may conduct public meetings prior to and at any time during the development of the project, depending on the public involvement strategies deemed appropriate for the activity. At a minimum, there will be at least one opportunity for a public meeting to be held for any federal-aid project, which requires significant amounts of right-of-way, substantially changes the layout or functions of connecting roadways or of the facility being improved, has a substantial adverse impact on abutting property, otherwise has a significant social, economic, environmental or other effect, or for which the Department determines that a public meeting is in the public interest.

The Department will discuss the need for a public meeting and type of public meeting (public information meeting or public hearing) required with the local elected official or his /her representative. Locations for holding the meeting and posting the legal notice will be coordinated, in addition to any special local cultural considerations such as the need for interpretation for communities / property owners not proficient with the English language. If the Department and the local elected official believe a public meeting is not warranted, the Department will document the determination and concurrence by the local elected official in the project files.

Similarly, information exchange and opportunities for public forums may be made during the development of transportation programs. In addition to a public meeting(s), communication may also be conducted, as needed, with specific neighborhoods, community groups, businesses or individuals to address specific concerns. The RPO and local first elected official should be informed and given the opportunity to participate in such meetings.

Direct notification should also be made to property owners of the start of land survey activities, and subsurface investigations including environmental testing (when entry onto private property is required). This notification is the responsibility of the office overseeing or performing the activity on private property and would advise the property owner of the Department's "right of entry" policy and provide an outline of the procedure. The notification must also request an authorizing signature on a form provided by the sponsoring agency acknowledging the property owner's understanding of the information provided.

Those responsible for final development of the proposed action should be made aware of all issues and commitments established for the proposed action during project planning, and should proceed with this framework. Coordination with public officials should take place prior to public meetings, with the goal of

addressing any concerns. The opportunity for public comment and participation can be made at this time for the action's sponsors to identify any additional specific issues and concerns that need to be addressed. This can be accomplished through a variety of strategies.

For actions that require the acquisition of additional rights-of-way, owners of affected properties shall be contacted individually to review those effects with a representative from the DOT Office of Rights-of-Way.

For projects determined to be "significant" under the Department's Work Zone Safety and Mobility Policy and Implementation Plan, a Transportation Management Plan (TMP), including an appropriate Public Outreach/Public Involvement (PO/PI) program will be developed.

CHAPTER 5: PUBLIC INVOLVEMENT DURING THE CONSTRUCTION, OPERATIONS & MAINTENANCE PHASES OF PROJECTS

Public Involvement during the Construction Phase

Once the construction phase of a project is initiated, the responsibility for continued project involvement and commitment to implementing context-sensitive solutions is transferred to the Department's Project Construction Unit. It is important to accomplish the final transfer of documented public involvement information from the Project Design Unit to the Project Construction Unit as soon as the plans, specifications and estimate for the contract are approved for a project letting. Informal and early coordination between the design and construction phases of projects is also encouraged and necessary, especially for significant and/or controversial projects. It is important to maintain some level of public outreach and involvement during the project construction phase. In addition to the public involvement that was established during the project planning and design phase, it now becomes important to also reach out to the traveling public that will be affected during project construction. Two critical stakeholders during the construction phase include:

- **The Community** – The continuation of outreach should involve those persons, groups, officials, agencies, etc. that were involved in the planning and design phases of the project. They have an extended interest in the project through the construction period, and after, to ensure that promises are kept. It is important to continue to keep the community informed using appropriate outreach tools.
- **The Traveling Public** – This new group consists of those persons, groups, etc. that were not necessarily involved with the project in the planning, design and/or environmental phases of the project. However, the construction of the project will now affect them through direct and/or indirect disruption to the transportation network. It is very important to keep this group informed and seek their input to avoid poor public relations for the Department, help achieve desired traffic flow and re-routing, maintain work zone safety, and generally reduce the impacts of the construction.

The new FHWA Work Zone Safety and Mobility Rule identifies very specific requirements for public involvement in the planning, design and construction phases of a project, as well as during the subsequent operation of the facility. Compliance with all of the provisions of this Rule is required as of October 12, 2007. The Work Zone Safety and Mobility Rule, as codified in 23CFR630, Subpart J, requires the sponsor agency (the Connecticut Department of Transportation) to develop a Transportation Management Plan (TMP) for "significant" projects. An important key element of the TMP is development and implementation of an effective public information and outreach campaign to mitigate negative construction zone impacts related to congestion and safety for workers and the traveling public. A significant project is defined as a project that, alone or in combination with other concurrent projects nearby, is anticipated to cause sustained work zone impacts (i.e., mobility or congestion and worker/traveling public safety) that are greater than what is considered tolerable in engineering judgment. For those significant projects there must be a Transportation Management Plan and corresponding public involvement element. The public involvement component must include communication strategies that inform affected road users, the general public, area residents and businesses and public entities about the proposed and ongoing project, anticipated work zone impacts and changing project conditions. During the construction phase of a project, it is important to keep the Department of Transportation's Office of

Communications and Operations Centers advised regularly on project conditions that will affect the traveling public. The information provided will be used for updating the Travel Information Gateway section of the Department's web site, issuing press releases, and keeping the media and public informed about on-going construction projects, as well as real time advisories via the Department's permanent variable message board system.

To assist in facilitating the dissemination of public information during project development and implementation, as well as during subsequent maintenance activities, the FHWA has developed the "Work Zone Public Information and Outreach Strategies Guide". The informative guide is aimed at assisting transportation agencies in the planning and implementation of effective public involvement and outreach plans for all projects. The comprehensive Guide covers all aspects of public outreach from determining the scope of the plan through evaluating the effectiveness. Effective methods and strategies on how to communicate with the targeted audience during construction are identified and explained in the Guide. These strategies include:

- Branding – Establishing a trademark for the project work zone campaign
- Mass Media – Radio, TV and newspapers reports for all major operational work and special events
- Web sites – Project information site – (can be continued from Design/NEPA phase)
- E-mail Alert – Direct contact with subscribers and the Department is developing the 511 service which provides current information about travel conditions, allowing travelers to make better choices
- Printed Materials – Project brochures for distribution
- Project Information Phone Line/Highway Advisory Radio – Free calls to get updates
- Changeable Message Signs – On-site resources for drivers
- Public Meetings, Workshops, Community Events – Opportunities for project and work zone information for the public
- Project Information Center – On- or near-site accessible locations, possibly the project field office
- Videos – Readily available for widespread use
- Highway Operations Center, which services the public 24 hours a day, 7 days a week, 365 days a year

The importance of good public involvement and outreach in the construction of a project cannot be over-emphasized. Not only does it ensure regulatory compliance, but it will provide for a safer and, potentially less congested, work zone. It will also promote goodwill for the Department by keeping the public informed and involved during the critical, highly-visible construction phase of a project.

Public Involvement during the Highway Operations and Operations Support Phases

The operation of and operation support for Connecticut's transportation system is a critical link between the Department and the public. These functions are evident on a daily basis with a direct link that the public, local officials, community groups, highway users, law enforcement personnel, and others can benefit from. After the construction phase of a project is completed, the operation and operation support phase begins. For nearly completed projects, there should be assurance that all environmental commitments and mitigation measures are in place. Information on those measures should be transferred from the Project Construction Unit to the Department's Highway Operations staff. No legal public involvement requirements are applicable during the operation and operational support phases, but methods for ongoing communication with the public and procedures for Department project follow-up should be established between Project Construction Unit staff and Highway Operations staff. Most of the public involvement in these phases will most likely be in the form of written questions and/or complaints from the public-at-large. The best way to respond to these issues is to ensure that the public is adequately and proactively informed about a specific project or projects and that all

communications are responded to promptly and effectively. All of these questions can be answered by having access to the project documents and having discussions with the previously involved Project Design and Construction Unit personnel. Having accurate and thorough project information and continued sensitivity to public concerns throughout the operations and operational support phase will enable the Department's Highway Operations staff to respond to public inquiries in a timely and efficient manner. By following these guidelines, the Department can minimize miscommunication with or the confusion of individuals who may be impacted by a transportation project. In order to ensure effective use of public involvement techniques and input, it is important to document all activity, participants, agreements and discussion points and make this information available to the public. The documentation must be complete and take place at the time of the public involvement activity (i.e., public hearing, transcript and sign-in) or shortly thereafter in an official file document. **It is critical to provide this documentation to indicate that the letter, intent and spirit of the referenced regulations are being followed.** The Department's responses to comments, as well as other information received through the public involvement process, should also be maintained in this record file. The public should be informed as to where to access documentation on a project-by-project basis.

Public Involvement during the Maintenance Phases

The Department's Office of Maintenance conducts on a daily basis throughout the state numerous activities that can affect travelers, residences and businesses. These activities can range from pothole repair to roadway resurfacing. Public outreach for maintenance activities that will result in a long-term (one day or more) disturbance of traffic movement can be conducted using media strategies. For roadway resurfacing projects, a specific public outreach procedure has been established. The components of this procedure are as follows:

- A letter is sent to Town Officials from the Department's District Maintenance Director advising them of the termini and incidentals that will be completed as part of the resurfacing project.
- Town Officials are contacted by the Department's District representatives to confirm that they received the letter and to discuss any concerns or answer any questions they may have.
- The RPOs are notified of the details of resurfacing projects by staff in the Department's Bureau of Policy and Planning.
- A copy of the resurfacing list is also sent to:
    - The Bituminous Producers Association and The Connecticut Construction Industries Association,
    - Utility Companies

The Department's Office of Communications is also provided with a copy of the list, and a press release is published prior to the start of work.

CHAPTER 6: CONDUCTING PUBLIC INFORMATION MEETINGS AND HEARINGS

The Department will conduct public information meetings during all planning, implementation, and operation phases of projects, as may be necessary and appropriate. Department project managers are further encouraged to use additional tools, as enumerated in the most recent revision of its *Public Involvement Guidance Manual*, in an effort to obtain public feedback and to keep the public fully and accurately informed.

The Department will hold public hearings and/or public information meetings at a place and time generally convenient for persons affected by or interested in the proposed undertaking at facility that is accessible to the handicapped. When necessary and appropriate, the Department should make accommodation for those with limited English proficiency or physical disability. With this in mind, the Department has implemented a service on its web site to allow and encourage the general public to request special accommodation requirements during public hearings and or public informational meetings. These requests include, but are not limited to, multi-language translation, ADA requirements and hearing and visually impaired accommodations.

COMPARISON OF PUBLIC HEARING AND PUBLIC INFORMATION MEETING

PUBLIC HEARING	PUBLIC INFORMATION MEETING
Is held to obtain public input. It is generally not a question and answer format.	Is held to provide information and obtain public input.
Some are required by regulations; others are granted on a case-by-case basis.	In most cases, will satisfy public involvement requirements.
Is governed by rules concerning who speaks and for how long.	Is more of an exchange of information between interested parties. May be an open discussion during which attendees may ask questions. May be a question and answer format.
Is overseen by a moderator.	Is usually run by the project manager or a designated chairperson of the meeting.
A transcript of the public input is produced and entered into the public record.	Minutes of the meeting are prepared. Public comments are not entered into the public record verbatim.

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’s 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 should be prepared to receive oral comments delivered in front of those in attendance, and should be prepared to record these accurately. The Department should also be prepared to receive written comments that are hand-delivered at the public informational meeting or hearing or that are mailed to the Department, or submitted electronically to the project manager via the internet.

The State's *Freedom of Information Act* requires that notice of each public meeting shall be posted not less than twenty-four hours before the meeting on the Department's Internet web site. Also, the notice shall be filed with the Secretary of State not less than twenty-four hours prior to the meeting. The notice shall specify the time, place and purpose of the public meeting.

Within seven days of the public informational meeting or public hearing, the meeting minutes shall be available for public inspection and posted on the Department's Internet web site. The Department will make, keep and maintain a record of the proceedings of the meeting.

As a condition for attendance at a meeting, no member of the public shall be required to register the member's name, or furnish other information, or complete a questionnaire or otherwise fulfill any condition precedent to the member's attendance.

The complete document on Connecticut's Public Involvement Procedures is available online at this address: http://www.ct.gov/dot/pip .

B) Public Involvement Guidance Manual

The Department has also developed a Public Involvement Guidance Manual (PIGM), which includes suggested strategies to engage the public.

The Department undertakes a public outreach effort to solicit public input when updating plans. Below are excerpts from the PIGM that outline key elements within the document.

A strategic process for soliciting public input and engaging the public beyond the public meeting is to set up an advisory committee. Its members could be planners, government officials, civic and neighborhood groups, historic and environmental preservation groups, key community leaders, project neighbors, business leaders, people who represent low-income or special needs groups, including the elderly and persons with disabilities. An effective Advisory Committee may be made up of people interested in working on transportation issues, representatives of key stakeholder agencies, those knowledgeable about the community or tied into community networks, those affected by the plan or project, and/or those representing diverse elements within the community.

Other strategies to help promote outreach beyond the public meeting are Websites, News Letter, Flyer, public meetings (to include fact sheets, brochures, FAQs), and mailing lists.

Traditional methods of working with the public (e.g. evening meetings at public buildings, websites and newsletters) may not be effective for all groups. Many elderly people prefer meeting during the day because they do not feel safe leaving their homes after dark. Single parents may be faced with finding childcare in order to attend a public meeting. Low income population groups often juggle two or more jobs and work evening shifts to make ends meet. The Department will utilize demographic information to determine if low income and minority populations are impacted by the project and make targeted efforts to engage them in the process.
To reach these populations consider the following outreach techniques and tips:

A list of specific strategies to conduct outreach for traditionally underserved populations:

- Go to where people are already meeting. Arrange to speak at senior citizen and community centers, school PTA meetings or community gatherings.
- When possible, hold public meetings on a public transit corridor so people who don't drive can have access.
- Consider having a community member assist at the sign-in table. They will be familiar with people and can help write the names and addresses of people with limited English language skills.
- Provide refreshments. It facilitates socializing.
- Ask schools' permission to have students bring home flyers to their parents.
- When requested, have sign language interpreters at meetings for the hearing impaired
- Make sure all printed material can be understood. This may mean printing in large type for the elderly population, translating into a second language and, as always, using simple language (avoiding technical jargon).

The complete document on Connecticut's Public Involvement Guidance Manual, is available online at this address: http://www.ct.gov/dot/lib/dot/documents/dpolicy/pigm_final_11_16_09.pdf

Title VI Process Review

Any additional attachments submitted from the RPOs in response to the questions in this section have been reviewed by the Department. As these are large files, these attachments have not been attached to this document but are available upon request.

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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

Rose Etuka, Title VI Coordinator	Debra Goss, Title VI Coordinator
Maribeth Wojenski, Assistant Director	Irma Reyes, EEO Specialist & Title VI Assistant
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 Tracks 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

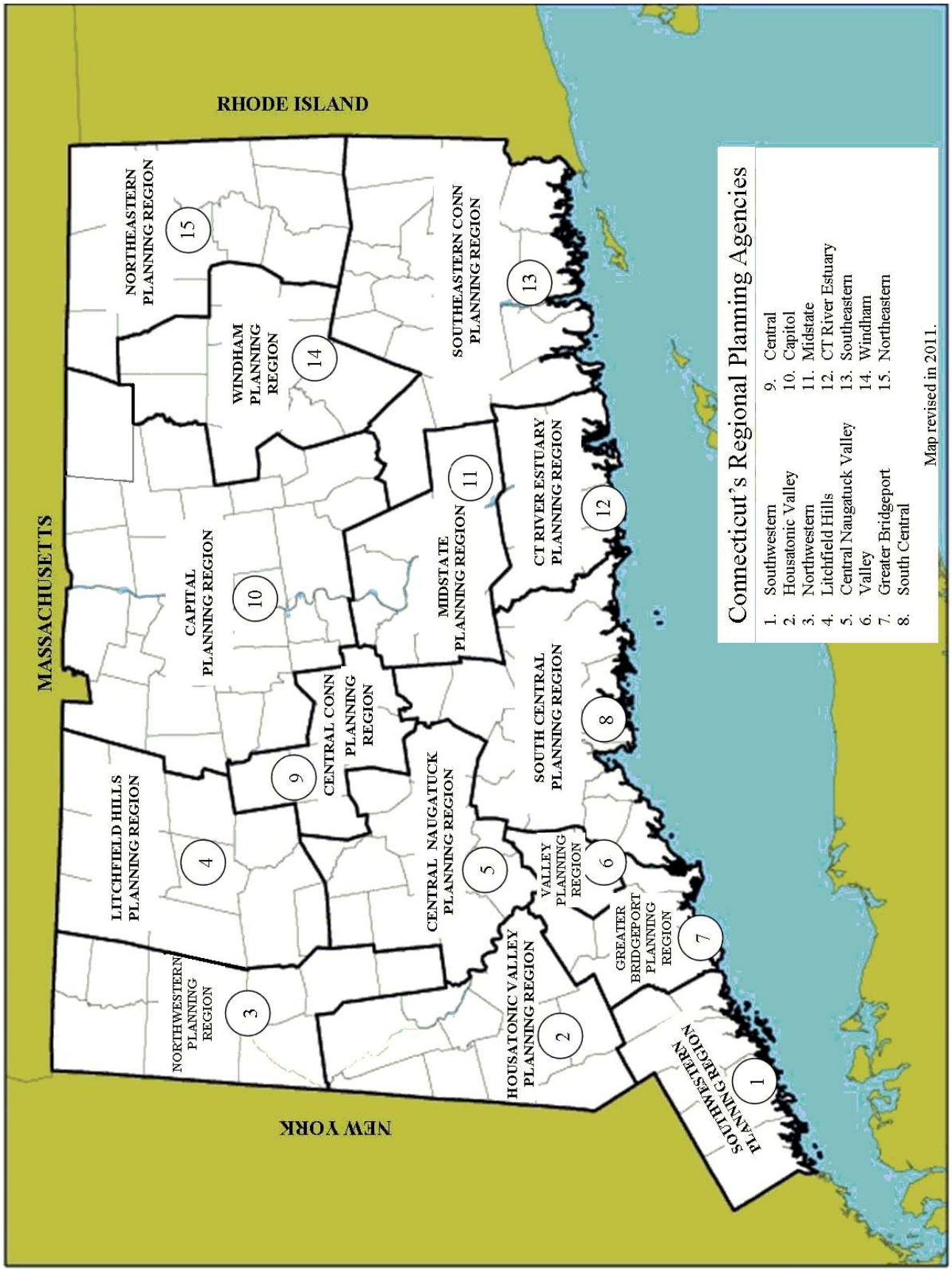
indication of availability of documentation in the alternative language.

- 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.


RHODE ISLAND
MASSACHUSETTS
NEW YORK
NORTHEASTERN PLANNING REGION
15
WINDHAM PLANNING REGION
14
SOUTHEASTERN CONN PLANNING REGION
13
CAPITAL PLANNING REGION
10
MIDSTATE PLANNING REGION
11
CT RIVER ESTUARY PLANNING REGION
12
LITCHFIELD HILLS PLANNING REGION
4
9
CENTRAL CONN PLANNING REGION
SOUTH CENTRAL PLANNING REGION
8
CENTRAL NAUGATUCK PLANNING REGION
5
VALLEY PLANNING REGION
6
NORTHWESTERN PLANNING REGION
3
HOUSATONIC VALLEY PLANNING REGION
2
GREATER BRIDGEPORT PLANNING REGION
7
SOUTHWESTERN PLANNING REGION
1
Connecticut's Regional Planning Agencies
1. Southwestern
2. Housatonic Valley
3. Northwestern
4. Litchfield Hills
5. Central Naugatuck Valley
6. Valley
7. Greater Bridgeport
8. South Central
9. Central
10. Capitol
11. Midstate
12. CT River Estuary
13. Southeastern
14. Windham
15. Northeastern
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 develop 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.

Any additional attachments submitted from the RPOs in response to the questions have been reviewed by the Department. As these are large files, these attachments have not been attached to this document but are available upon request.

Fifteen (15) QUESTIONS TO ALL REGIONAL PLANNING ORGANIZATIONS

(Each RPO's answers the following questions are listed under the region's section below)

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? Secondarily, 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.

   - 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.
   - 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.

[1] All "enclosures" mentioned can be found at following CRCOG webpage: http://www.crcog.org/transportation/TitleVI.html

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:

- *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.

- *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 Network[2]) and the Transportation Committee members (including the EJ representatives to that committee.)

- *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

[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.

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:

- LEP analyses and recommended outreach efforts have been developed prior to initiating seven special transportation studies.
- 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.
- 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.
- Summaries of important planning documents (TIP, LRP) have been translated into Spanish.
- 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 then 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-leased.

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 fit 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 com-plaints about the Agency's public involvement process have been raised in at least a decade. CCRPA has undertaken strategies to reduce barriers. These include:

    - Having disabled-and transit-accessible offices

- Providing telephone and e-mail contact information for all staff on the Agency's web site
- Maintaining and distributing notices and materials to mailing lists of stakeholders and interested parties
- Offering interpretation for Agency meetings
- Translating MPO materials into secondary languages
- Holding meetings, events, and activities in local communities
- Using social media
- 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-cy 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 ser-vice 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 consult-ants 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 then 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 TitleVI/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 on 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.

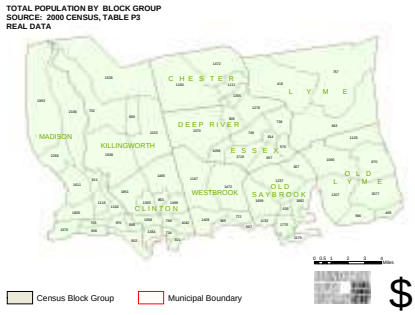
- CRERPA is still working a method to systematically review effectiveness of public outreach. The region's population is still getting use to the idea that there is a transportation planning process in the state and CRERPA region. Meetings of the CREPA, CREMPO, and ETD boards are rarely attended by the 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.

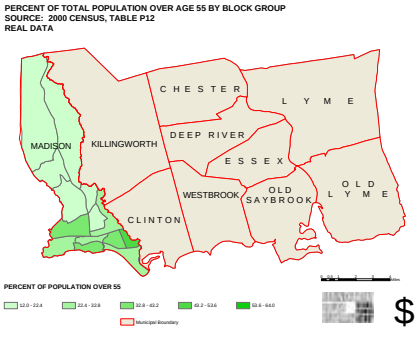
Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities.

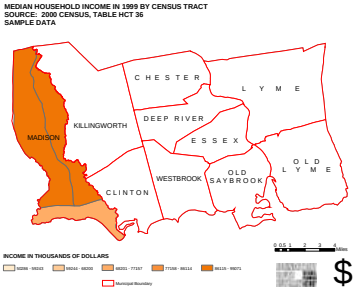
- Title VI/EJ has been included in all UPWP and quarterly reports subsequent to the 2003 Title VI/EJ CREMPO review.

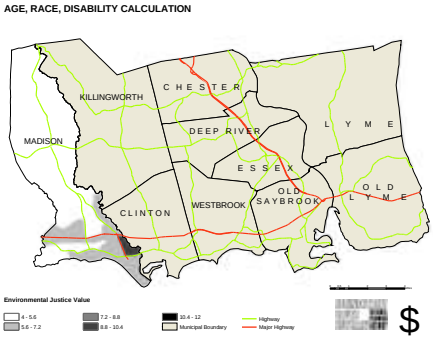
The following are CRERPA's answers to the 15 CTDOT questions to all RPOs.

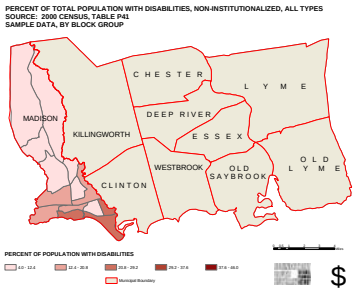
1. CRERPA hired a GIS/Data analyst who researched Title VI/EJ guidelines, review existing census data on a block group level, and produced data for targeted population from the 2000 Census Block Group. The result was a series of maps and associated data in 2005-2006 which identified key areas for disadvantaged populations: total population, age, Spanish speaking, disability identified, and income. (see below)

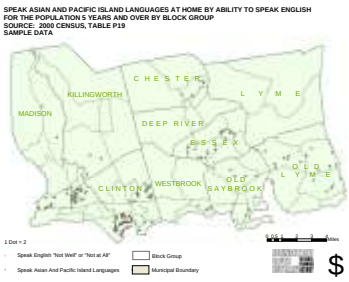


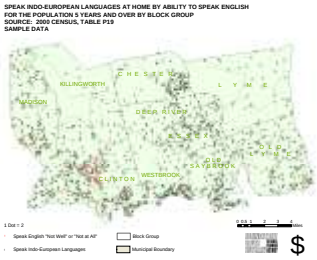


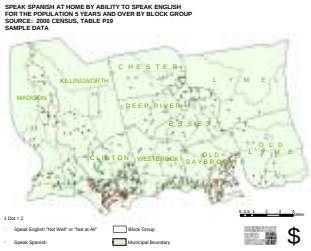


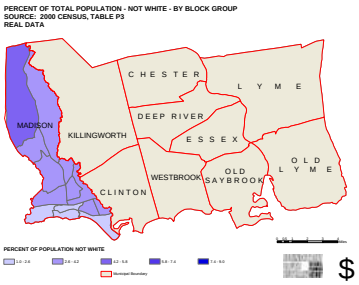












2. As CRERPA moved forward from 2003, the projects within the TIP became less focused on pavement renovation or reclamation. This was a major transition for the member towns. The primary goals for CRERPA was to focus a new long range planning process on ways to reallocate the TIP toward projects that 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 then 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 COGCNV and has found the following deficiencies and areas of concern with their Title VI practices. The Department will schedule a meeting with COGCNV 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.

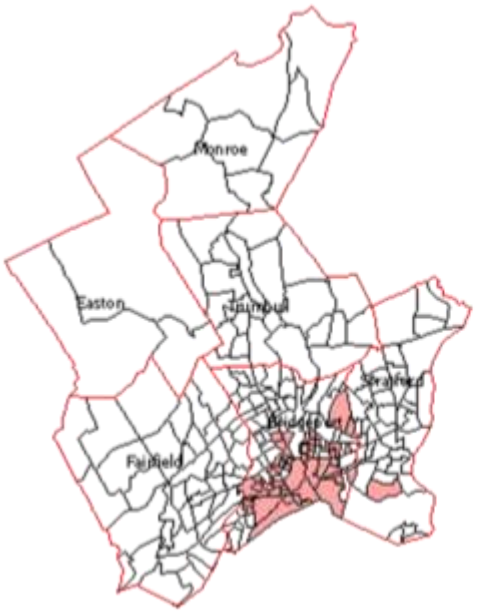
The maps presented in the previous sections highlight the distribution of block groups that meet the criterion threshold for the various categories. As can be seen, many areas show up on a number of maps, predominately in Bridgeport.

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.

Table 9: Number of Block Groups Meeting Threshold Criterion by Category Greater Bridgeport Planning Region

	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 Thresold Criterion on All Categories	53	22.7%



Greater Bridgeport Planning Region

Block Groups Meeting the Threshold Criterion on All Categories

Block Groups Highlighted on All Categories

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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 GBVMPO'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*[n] *or "bad*[n] *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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- 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 in 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 venue 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 form 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 place 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 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)	*Action By(Involving)/Review By*								
		news release (3)	*direct mail* (4)	*scrcog agenda*	*public meeting*	*public hearing*	*work session(s)*	*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 First Cut Draft"	45	yes	yes	yes	yes	no	yes	yes	yes	yes
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/ CTDOT 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.scrcog.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.scrcog.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 there 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 (SCCOG) 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 then 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.

   SCCOG 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 SCCOG 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. The population of the Region is approximately 364,519, and the majority of the EJ populations reside in the Cities of Norwalk and Stamford. Those municipalities are the only communities in the Region, which demonstrate any substantial ethnic diversity or economic disparity.

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 cinqo (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 disproportionally 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 2010-2013TIP 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 there 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 then 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.valleycog.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 there 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 has reviewed each RPO's responses, documentations and websites cited. Each RPO's deficiencies and areas of concerns have been identified. 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.

The Department will continue to see that the MPOs emphasize/reemphasize of Title VI 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.

A full Title VI process review will be conducted on MPOs every 5 years. The Department will interview each MPO during the months of February and March 2012, to go over the deficiencies found in the Title VI, EJ and LEP plan review. All interviews will be completed by March 31, 2012. The MPOs will be required to provide quarterly reporting on the progress made concerning Title VI, EJ and LEP in their regularly scheduled quarterly reports submitted to the Department. The first quarterly report to include this information will be dated July 15, 2012 – for the previous quarter (April – June). The next Title VI process update will review the measures and steps taken by RPOs to address these deficiencies and areas of concerns.

Section XV – Program Administration, Monitoring of Subrecipients and assistance to Subrecipients

(The Title VI Information Packet is included in the attachments)

Section XV-1	Title VI Information Packet
Section XV-2	Vendor Profile Application

Section XV: Program Administration – State-Managed Programs

The Connecticut Department of Transportation (the Department or CTDOT), as the agency designated to apply for, receive and administer FTA funds, makes federal funds available for the development, implementation, and promotion of public transportation systems through an application process for each of the statewide federal programs – Sections 5310, 5311, 5316 and 5317. CTDOT developed State Management Plans for each of the four separate state-managed programs. The Plans include the process for outreach, filing applications, technical assistance and program monitoring. The Department passes through funds without regard to race, color, or national origin and minority populations are not being denied the benefits of or excluded from participation in these programs.

FTA Circular 9040.1F permits CTDOT to retain up to 15 percent of the state's fiscal year apportionment of 5311 program funding for state administration, planning and technical assistance. FTA Circular 9070.1F permits CTDOT to retain up to 10 percent of the state's fiscal year apportionment of 5310 program funding for state administration, planning and technical assistance.
CTDOT uses these funds for staff, support costs associated with managing the grant programs, and to provide technical assistance. Examples of assistance include:

- Conducting site visits and desk reviews.
- Meeting with the staff of providers and applicants to clarify requirements.
- Obtaining and updating the required assurances and documentation.
- Developing grant application to FTA
- Developing and monitoring the grant agreements with grantees
- Preparing required reports to FTA.
- Providing technical assistance.
- Updating the State Management Plan
- Legal advertisements and room rental costs for applicant workshops.
- Conducting requests for proposals.

Generally, the applications and the instructions for these programs guide and assist eligible subrecipients in applying for operating, administrative, capital, and/or training assistance under the federal programs. The information provided by the applicant is used by CTDOT to evaluate, approve and prioritize proposed projects, and to incorporate them in CTDOT's applications to FTA for funding.
In this section, each of the four targeted statewide programs will be presented separately since they each have certain individualized features for how their projects are competitively selected, how program criteria are designed and prioritized in the selection of successful applicants, the methods by which technical assistance is provided to potential applicants and subrecipients, and the degree to which programs and applicants are assessed for addressing low-income and minority populations.

<u>General Requirement: Technical Assistance</u>
The following describes generally how technical assistance is provided to potential applicants. The types of technical assistance requests can be vary for the different programs, and different mechanisms are followed for the different grant programs. They can be found in the existing State Management Plans for each program.
All application documents for all programs are made available at the Office of Transit and Ridesharing (OTR), on the Department's website and at the State of Connecticut Department of Administrative Services (DAS) website.

The OTR staff for program management, operational, planning, and financial specialists are readily available to provide a wide range of technical assistance to applicants and eligible subrecipients. Each federal program manager at OTR is readily available to address questions regarding the specifics each program; the contents of each program application process; and requests for technical assistance. Additionally, the OTR draws upon other resources within the Department as well as contracted professional services, to provide technical assistance in such areas as legal, purchasing, accounting, auditing, training and civil rights.

The mechanism for requesting technical assistance is specified clearly in both the plan and the applications for each separate program. All parties who participate in the distribution of the applications to various members of the community are knowledgeable of the resources available for technical assistance, and provides information to those entities needing assistance. Any technical assistance is provided in compliance with the Department's LEP Implementation Plan. And each program has a targeted outreach plan in the combined plan laying out the process by which the Department can have some assurance it is reaching out to the complete pool of traditional and non-traditional applicants in order to assure that low-income and minority populations have access to the program's benefits.

Section 5310 - Elderly Individuals and Individuals with Disabilities Program

The Section 5310 grant program provides vehicle grants to non-profit agencies or municipalities to provide transportation needs to the elderly and persons with disabilities when the transportation service provided is unavailable, insufficient, or inappropriate to meeting their needs. The annual application process begins in fall of each year, with award announcements made in the spring. The application document is updated every year and prior year applications are not accepted. The applications must be received by both the Connecticut Department of Transportation and the Regional Planning Organizations by the date of the deadline. Applicants must publish a public notice in a major newspaper on two occasions, one week apart. Applicants will be notified of grant approval/denial in writing.

CTDOT maintains a record of all requests for Elderly Individuals and Individuals with Disabilities, Rural and Small Urban Area formula Funding, JARC and New Freedom funding. The record identifies applicants that use grant program funds` to provide assistance to minority populations and low-income populations. The record also identifies which applications were funded and those that were not funded.

Application Process – The annual application process is conducted in cooperation with Regional Planning Organizations (RPOs) throughout the state. The Department sends the annual application to each RPO who, in turn, distributes applications to known human service agencies and municipalities in their geographic area. The RPOs provide the initial outreach, but the Department and the RPOs work with potential applicants as the application process proceeds.

The RPOs, most of whom also have metropolitan planning responsibilities and therefore Title VI pass-through responsibilities under the statewide metropolitan planning program (see section XIV) are knowledgeable of the local human service agencies who are the targeted subrecipients of 5310 grants. The RPOs reach out to many localized agencies and are familiar with the needs of Title VI and Environmental Justice communities in their service area. Still, as part of their responsibility, the RPOs must submit an analysis of their outreach effort and must provide the first tier of technical assistance to potential applicants. As indicated above, while the CTDOT staff is a resource for all the technical assistance, the RPOs are the most local and most accessible resource in the first instance.

At the request of a potential applicant, the Department also goes over any section of the application prior to submittal to make sure the proposer understands what is required.
Both the RPO and the Department must receive a complete copy of the application by the deadline. The RPOs and the Department separately review each application to ensure that all required documentation has been submitted. The RPO notifies applicants of any pending issues that require resolution before the application can be reviewed.

Competitive Selection Process

The CTDOT provides their process for the pass-through of Federal Transit Administration (FTA) funds under the Transportation for Elderly Individuals and Individuals with Disabilities, Rural and Small Urban Area Formula Funding, JARC and New Freedom grant programs without regard to race, color, or national origin and that minority populations are not being denied the benefits of or excluded from participation in these programs.
A description of the Department's competitive selection process is submitted to FTA as part of the grant application process and was developed to ensure the equitable distribution of funds to subrecipients that serve predominately minority and low-income populations, including CTDOT's Native American tribes.

The applications are reviewed separately by the local RPOs and DOT each using the same point scale to rate the effectiveness of the applicant in filling gaps (unmet needs) in transportation for the target populations of seniors and people with disabilities. The RPOs submit their list to DOT, and the two lists are compared. Discrepancies in scoring are discussed and reconciled between the RPOs and the Department. Then a single list is prepared which contains all the regions with one prioritized statewide awards list.
The Department also provides a description of the criteria used for selecting service providers to participate in any FTA grant program.

Demographic Information Collected – To ensure compliance with U.S. Department of Transportation (DOT) civil rights regulations (49 CFR part 21), and the DOT Order on Environmental Justice, FTA requires grantees to document that they distribute FTA funds without regard to race, color, or national origin (FTA C 4702.1A).

Applications for Section 5310 funding require the applicant to supply the following data:

Estimate the number of individuals in the following groups to receive service:

	Black
	Asian/Pacific Islander
	Hispanic
	American Indian/Alaskan Native
	Other

Depending on the type of project, it may be based on actual client records or it may be estimated based on census data for the service area.

For future applications, applicants are now requested to provide more detail regarding the data source being used to capture this demographic information (or example, is it based on the current client base; based on Census data for their service area; or some other source?

The demographic information submitted as part of the application is also used to determine whether the minority and low-income populations are being reached. If not, additional outreach is required in order to reach those populations. The Department then makes more targeted efforts to identify and assist organizations that serve the minority and low-income populations.

For example, is there a significant population of older adults whose race is Alaskan Native in an area? Is there an organization that serves that population? Have they applied for funding from the 5310 program? Have they been turned down for 5310 funding? Is there assistance the Department can provide to make it possible for them to competitively compete for or receive those grant funds?

Technical Assistance – Applicants and potential applicants can receive assistance from their local RPO or by calling the Department's 5310 program manager. Those avenues of information exchange and assistance are made clear in the application and included as an opportunity in the on-line postings of the proposal solicitations.

Program Monitoring – As indicated in the Section 5310 State Management Plan, ridership demographics and race/ethnic data is part of the routine project monitoring and quarterly reporting. Part of the routine site visits made by Department staff to 5310 subrecipients also includes reviewing rider demographic reports.

Program Management Changes Since the Last Program Submittal to Enhance Title VI Efforts - The Department has made the following changes to its oversight of the 5310 State Management Plan in order to improve the Title VI effectiveness of the 5310 program.

Annual Application and Evaluation Process

- To enhance outreach to agencies that serve Title VI populations, the Department has delegated an additional mandate to the RPOs to assure that their distribution of applications and other program outreach fully encompasses agencies and organizations that serve Title VI populations.
- To insure better coverage of program services to Title VI populations, the Department has also delegated to the RPOs an assessment of the representativeness of the applicants compared to the Title VI demographics of their region, and an assessment of the validity of the demographic data submittals of the applicants.
- The Department has enhanced its review of applications to verify the RPOs' review and assessment of the aforementioned Title VI issues of outreach and coverage.
- The portion of the application that refers to technical assistance has been enhanced in accordance with the agency's intent to provide more real-time assistance to applicants requiring assistance, and to enforce accurate completion of the sections of the application that specify demographic data.
- CTDOT will provide annual notices of the availability of funding to all known transit operators, including Indian Tribes, minority organizations and low-income serving organizations.

Section 5311 – Formula Grants for Other than Urbanized Areas

The Federal Transit Administration (FTA) Section 5311 program makes federal funds available to the states to assist in the development, implementation and promotion of public transportation systems in rural and small urban areas, using a population based distribution formula. The goal of the program is to:

- Enhance the access of people in nonurbanized areas to health care, shopping, education, employment, public services and recreation.
- Assist in the maintenance, development, improvement, and use of public transportation systems in nonurbanized areas.
- Encourage and facilitate the most efficient use of all transportation fund used to provide passenger transportation in nonurbanized areas though the coordination of programs and services.
- Assist in the development and support of intercity bus transportation.
- Provide for the participation of private transportation providers in nonurbanized transportation**.**

The State Management Plan (SMP) has been prepared to incorporate policy changes in the administration of the Section 5311 program due to the issuance of FTA Circular 9040.1F which incorporates provisions of the Safe, Accountable, Flexible, Efficient, Transportation Equity Act. Please refer to the link below for the State Management Plan – Section 5311.
http://www.ct.gov/dot/lib/dot/5311SMP.pdf

Application and Evaluation Process - In January, every three years (starting in July 2012 the process will be every four years), CTDOT sends a letter to 5311 subrecipients about their obligation to submit a Three Year Grant Application. Before the submittal due date, CTDOT sends an email reminder and follows up with phone calls to Subrecipients to answer any questions about application process.
Upon receipt of applications, CTDOT reviews each application to ensure that the application has been completed correctly and the required documentation has been submitted.

Technical Assistance - Subrecipients are notified of and are required to address any outstanding or pending issues with their application as determined by CTDOT. Subrecipients are again made aware that technical assistance is always available from CTDOT. CTDOT also offers to meet with the subrecipients to go over their application to make sure they understand what is required and to avoid any unnecessary delays.
Upon completion and satisfaction of CTDOT's review, an approval letter is mailed to the subrecipients.
For over three decades CTDOT has provided Section 5311 operating and capital funding to five (5) rural transit districts. On annual basis CTDOT seeks proposals from Intercity Bus Service providers as required by the

Circular 9040.1F. The Department does not limit which rural areas may submit proposals for rural demonstration project funding. Top priority for the expenditure of Section 5311 funding has been the continuation of existing rural transit services. If increased funding levels were to be provided, that would clearly allow for the development of a new project in which case applications would be solicited, received and reviewed by CTDOT for feasibility of implementation.
A details on the application process and format can be found in CHAPTER 9.0: ANNUAL PROGRAM OF PROJECTS DEVELOPMENT AND APPROVAL PROCESS of the Section 5311 Connecticut State Management Plan dated August 2010.

Demographic Information Collected – In the Three Year Applications for funding under 5311 Program, applicants are required to describe their service area including demographic data e.g. provide the percentage of minorities, low income or elderly population. Demographic information is used to determine which rural service areas include populations which are in most need of public transportation (e.g. low income, elderly).

Monitoring – CTDOT currently conducts a Transit System Audit of its Section 5311 subrecipients on a triennial basis. The audit consists of the completion of a questionnaire, an on-site visit in which follow-up questions are asked, the review of pertinent documentation (i.e., policies), and riding the transit service(s) including a bus ride checklist. A final report is prepared and issued to the subrecipient noting any findings, with the required submission of a corrective action plan addressing each finding to bring the subrecipient into compliance. In the process of Transit System Audits, the Subrecipients are also required to provide their Limited English Proficiency (LEP) Plan which requires them to perform four factor analyses. Other Title VI information related is also verified during Transit System Audits and includes but is not limited to: EEO postings, Subrecipient's Title VI Plan, Title VI Complaint Procedures, Title VI postings on the schedules and on the vehicles visible to the passengers, what efforts the Subrecipients make to hire DBE firms, etc.
A detailed review of the Transit System Audits and the Subrecipient's Questionnaire can be found in CHAPTER 20.0: TRANSIT SYSTEM AUDIT and APPENDIX E - TRANSIT SYSTEM AUDIT QUESTIONNAIRE of the Section 5311 Connecticut State Management Plan dated August 2010
Also, CTDOT must have on file the following Title VI general reporting information from Section 5311 subrecipients:

1. A concise description of any lawsuits or complaints alleging discrimination under Title VI in service delivery filed against the subrecipients within the past year.
2. A statement of the status or outcome of each lawsuit or complaint.
3. A summary of all civil rights compliance review activities conducted by the subrecipient in the last year. The summary should include:
    a. The purpose or reason for the review.
    b. The organization conducting the review (i.e. a city civil rights office, MPO, or consultant).
    c. A summary of the findings and recommendations of the review.
    d. A report on the status or disposition of findings.
4. An analysis of any environmental and/or socio-economic impacts as the result of proposed construction projects, including the impact on minority and low-income communities. This information is required only for those projects which do not qualify as a categorical exclusion in the environmental process.

In addition, applicants for Section 5311 funding are required to comply with relevant equal employment opportunity requirements. CTDOT is responsible for maintaining the information submitted by applicants and assuring FTA that all applicants have met the EEO requirements, as detailed in FTA Circular 4704.1, prior to receipt of Section 5311 funds.

If applicable, applicants with fifty (50) or more mass transit related employees which have received federal capital or operating assistance grants, or any combination thereof, of $1,000,000 or more in the previous Federal Fiscal Year, will be required to submit to CTDOT an EEO program consistent with the criteria set forth in FTA Circular 4704.1.

All Section 5311 applicants must adhere to the requirements as specified in the U.S. Department of Transportation's Disadvantaged Business Enterprise (DBE) regulations set forth in 49 CFR part 26

'Disadvantage Business Enterprise' www.fta.dot.gov/laws/leg_reg_3304.html. Subrecipients must submit to CTDOT a DBE program and set DBE goals. DBE goals are monitored continually by CTDOT from the application phase through project close-out. Subrecipients report to CTDOT semiannually on DBE contracting activities.
In the future CTDOT plans to perform Transit System Audits on a more frequent interval than three years. Also, more detailed demographic data will be required to provide by the Subrecipients in their three year grant applications including source of information.
Technical Assistance - Every Section 5311 Subrecipient receives Connecticut Section 5311 State Management Plan every time it gets updated. In addition, State Management Plan is available for download on CTDOT's website at:
http://www.ct.gov/dot/cwp/view.asp?a=1386&q=464108

Also, anyone interested in this program can receive a copy upon request. CTDOT staff provides technical assistance to its Section 5311 subrecipients by communicating daily via phone, e-mails, correspondence, facilitating quarterly transit meetings, scheduling meetings to discuss specific subject matter, and performing triennial transit system audits. Technical assistance is also provided to Section 5311 subrecipients via notification of upcoming training courses, workshops, and webinars which subrecipient are encouraged to participate in. Also 5311 Subrecipients are invited to attend Title VI courses facilitated by the CTDOT's Title VI Coordinator. The Transit System Audit Report also can indicate which areas (including Title VI) require improvement and can provide the actual federal regulations which the Subrecipient can refer to in order to be compliant.

Section 5316 (Job Access and Reverse Commute) and Section 5317 (New Freedom)

In Connecticut, the job access (JARC) program for transportation for low-income workers has been in operation since 1999 using FTA funds and has been managed by CTDOT. Five regional partnerships support the JARC program. Each has developed a program of services specific to the region's needs and resources. This effort requires a broad partnership of involved parties to identify existing transportation services, where the jobs were located and where low-income workers reside.

The Connecticut Department of Social Services (DSS) and CTDOT work together with the regional facilitators to increase transportation resources for low-income workers. DSS contracts with Transportation to Work (TTW) coordinators, one in each of five regions. These coordinators then subcontract with transportation providers within their regions to provide access to jobs for people receiving Temporary Assistance to Needy Families (TANF) or that are eligible for TANF.

The SAFETEA-LU transportation authorization created the New Freedom program which is targeted to improving transportation services beyond the ADA mandates for people with disabilities. The delivery and administration of the New Freedom program was effectively merged into the Job Access program taking advantage of the pre-existing regional facilitation. This also enabled the Job Access and New Freedom programs to effectively address the SAFETEA-LU requirements for the preparation of a Locally Coordinated Public Transit Human Service Agency Transportation Plan.

Public Participation– The TTW coordinator in each region invites relevant partners to the table for its regular meetings to plan and discuss services and policies, and review operations and budgets for the transportation services offered. Although the exact makeup varies by region, meetings are attended by regional planning organizations, DSS, CTDOT, and the Department of Labor, job developers, case workers, employers, workforce investment boards, and other local human service agencies. The mix of partners can also vary due to the dual goals of the two programs of the JARC programs mission of providing access to jobs for low-income workers and New Freedom's mission of providing access to all services for people with disabilities. Slightly different partners may be present at 5317-specific planning and monitoring meetings due to the somewhat different demographic, but all of the front-line outreach and technical assistance is provided by the regional facilitators. The regional facilitators provide hands-on assistance for agencies with unmet transportation needs and targeted technical assistance in meeting program requirements for applicants interested in accessing the JARC funding. The facilitators assess transportation gaps as they impact eligible

clients, so there is a level of planning and needs assessment they perform. They also market services to potential job seekers and to employers by providing information material and training sessions to agencies and organizations serving clients in their service delivery area. They develop and distribute brochures, information fliers, posters, and transportation schedules. The contractors are also responsible for all of the financial and programmatic reporting and evaluation requirements.

Application Process – Every two years a combined solicitation for project proposals is conducted for the Section 5316 Job Access and Section 5317 New Freedom programs. The grant applications are distributed to all known parties as well as being made available on the CTDOT website and the Department of Administrative Services website. The regional facilitators also notify eligible local entities of funding availability and determine applicant eligibility. In accordance with SAFETEA-LU, all program funding for these two programs, as well as the 5310 program, must be derived from the Locally Coordinated Public Transit Human Services Transportation Plans. Funding availability is specified by region using the urbanized and non-urbanized area funding apportionments from FTA. The Job Access program requires a non-federal match but those matching funds are provided by the state funding in the program. New Freedom project requests also require a non-federal share but matching fund availability is not guaranteed by the state so applicants must have the resources to support the non-federal portion of their program budget.
The most recent project solicitation was issued in February 2011 with the goal of awarding grants in late 2011 and completion of agreements and start of service in early 2012.

Demographic Information Collected – To ensure compliance with U.S. Department of Transportation (DOT) civil rights regulations (49 CFR part 21), and the DOT Order on Environmental Justice, FTA requires grantees to document that they distribute FTA funds without regard to race, color, and national origin (FTA C 4702.1A). Applications for Section 5316 and 5317 funding require applicants to supply the following data:
Estimate the number of individuals in the following groups to receive service:

	Black
	Asian/Pacific Islander
	Hispanic
	American Indian/Alaskan Native
	Other

Information on race is used to determine whether the target populations for the grant programs that also fall into those racial categories above are being reached by the grant programs. If not, additional outreach is required in order to reach those populations. The Department then makes more targeted efforts to identify and assist organizations that serve the target population for the program that also fall within the categories listed above.

Application Evaluation Process – Applications for assistance are reviewed by each region and prioritization is done regionally in order to be attentive to the varying needs by region and in order to address the nature of the apportionments by urbanized and on-urbanized areas by FTA. The following criteria are used to evaluate applications.
The proposed project must:

- Serve the target population categories and address an identified gap,
- Achieve efficiency in service delivery,
- Not replace other funding programs or resources. (*If the strategy has been funded in prior years by a different resource, in order to be eligible for FTA funding programs, the strategy must have been rejected for future funds or had funding for the specific strategy reduced.)*
- Be able to start up in a reasonable period of time,

- Provide regional/geographical equity (*Each community should be able to share in the benefits from these funds.)*
- Maximize the use of available local, state and federal-funded public transportation resources, (*This will allow efficient use of resources already in place and will prevent the creation of a secondary layer of services.*
- Be subcontracted with a subrecipient that has the technical and managerial capabilities to conduct the project,
- Have appropriate resources available to provide the service (T*his would include wheelchair accessible vehicles, and could possibly include resources such as dispatch capabilities or other resources as determined by the strategy)y and*
- *H*ave an adequate plan to make the target population aware of the available service.

One of the primary evaluation criteria that is the responsibility of the regional facilitators and the entire regional oversight body, is certifying that allocations of grants to subrecipients are distributed in a fair and equitable basis, in addition to meeting the overall mission of addressing the appropriate target populations for each program.

Technical Assistance – Applicants and potential applicants can receive assistance from the regional facilitator or the Department's 5316/5317 Program Manager. Those avenues of information assistance are made clear in the application, and is included in the online postings of the proposal solicitations. In addition, regional planning organizations are very active in most of the region partnerships and take varying degrees of responsibility to reach out to potential applications and provide significant levels of assistance to same.

Program Monitoring – As indicated in the Section 5316 and 5317 State Management Plans, ridership demographics is part of the routine project monitoring and regular reporting. Each region has a monthly or bi-monthly meeting where performance of the many services provided under these two programs is monitored. This includes analyzing ridership and budget performance, as well as reviewing and assessing the funded services with regional goals and expectations and considering options when services fall below a level of performance and effectiveness.
In addition, with Job Access services, surveys are conducted in order to collect data on workforce participation, income levels, family size, etc. In recent surveys, additional questions have been added to try to gather better demographic information ion Title VI and LEP issues in order to improve outreach to the community and assure that funds are reaching the target audiences and markets.

<u>General Requirements - Program Monitoring</u>
CTDOT has a separate monitoring program for its subrecipients under 5310, 5311, 5316 and 5317. While all subrecipients in these programs are subject to the monitoring and oversight for all subrecipients detailed above, the State Management Plans specify a particular additional layer of monitoring to assure compliance with the wide range of state and federal requirements. The complete Transit System Audit Questionnaire is available in the State Management Plans and covers all the regulatory and programmatic requirements and the questions asked or observations made on site visits.
Immediately below is the series of questions relevant to Title VI and the broader Civil Rights requirements that is asked of each subrecipient in all oversight reviews and site visits for the state-managed programs.

VI. Civil Rights

1. *Who is the individual responsible for coordinating and ensuring that Title VI Program requirements, Equal Employment Opportunity (EEO) requirements and Disadvantaged Business Enterprise Program (DBE) requirements are fulfilled by the subrecipient?*
   SUBRECIPIENT RESPONSE:
2. *Does the subrecipient have an approved Title VI Plan in place which includes the following documents;*
   a) Title VI Policy Statement?
   SUBRECIPIENT RESPONSE:
   b) Limited English Proficiency (LEP) Plan?

SUBRECIPIENT RESPONSE:

c) Procedures for logging and investigating Title VI complaints?
SUBRECIPIENT RESPONSE:

3. *How does the subrecipient ensure persons with LEP have access to services?*
   SUBRECIPIENT RESPONSE:
4. *Does the subrecipient have Title VI notice with information on the protections afforded under Title VI, and how to file a complaint posted in areas readily accessible to your service users and the public?*
   SUBRECIPIENT RESPONSE:
5. *Is the subrecipient aware of Title VI Program reporting requirements? (Section 5311 subrecipients only) Please explain the requirements.*
   SUBRECIPIENT RESPONSE:
6. *How does the subrecipient ensure that its Equal Employment Opportunities (EEO) are fulfilled?*
   SUBRECIPIENT RESPONSE:
7. *What reasonable efforts are made by the subrecipient to ensure that Disadvantaged Business Enterprise (DBE) firms are afforded the opportunity to be hired in the award of federally funded contracts?*
   SUBRECIPIENT RESPONSE:

Additional information on how CTDOT administers FTA federal programs can be found in each program's State Management Plan. Each State Management Plan is available at OTR or at CTDOT's website. Similarly, when the combined program is finalized, that plan will also be available on the website.

General Requirement – Pass-Through of Nondiscrimination Standard Language

The Department requires all subrecipients to agree to comply with all applicable civil rights statutes and implementing regulations including but not limited to Title VI requirements. The specific sections below are included directly or by reference in all agreements and are the mechanism for passing through all applicable federal Civil Rights and Title VI requirements. CTDOT specific compliance tasks are also highlighted where appropriate.

a. Nondiscrimination in Federal Transit Programs. The recipient agrees to comply, and assures the compliance of each third party contractor at any tier and each subrecipient at any tier under the Project, with the provisions of 49 U.S.C. 5332. These provisions prohibit discrimination on the basis of race, color, creed, national origin, sex, or age, and prohibit discrimination in employment or business opportunity.

b. Nondiscrimination –Title VI. The recipient agrees to comply, and assures the compliance of each third party contractor and each subrecipient at any tier of the Project, with all of the following requirements under Title VI of the Civil Rights Act of 1964:

(1) Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C. 2000d et seq.), 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;

(2) U.S. DOT regulations, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act," 49 CFR part 21;

(3) The current FTA Circular 4702.1 "Nondiscrimination Guidelines for FTA Recipients." This document provides recipients and subrecipients with guidance and instructions necessary to comply with DOT Title VI regulations (49 CFR part 21), the Department's Order to Address Environmental Justice in Minority Populations and Low-

Income Populations (62 FR 18377, Apr. 15, 1977), and U.S. DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (70 FR 74087, December 14, 2005);

(4) U.S. DOT Order to Address Environmental Justice in Minority Populations and Income Populations. This Order describes the process that the Office of the Secretary of Transportation and each operating administration will use to incorporate environmental justice principles (as embodied in Executive Order 12898 on Environmental Justice) into existing programs, policies, and activities; and

(5) U.S. DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons. This guidance clarifies the responsibilities of recipients of Federal financial assistance from DOT and assists them in fulfilling their responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations.

c. Equal Employment Opportunity (EEO) Compliance. The recipient agrees to comply, and assures the compliance of each third party contractor and each subrecipient at any tier of the Project, with all equal employment opportunity EEO requirements of Title VII of the Civil Rights Act of 1964, as amended (42 U.S.C.2000e), and 49 U.S.C. 5332 and any implementing requirements FTA may issue.

d. Nondiscrimination on the Basis of Sex. The recipient agrees to comply with all applicable requirements of Title IX of the Education Amendments of 1972, as amended, (20 U.S.C. 1681 et.seq.), with implementing DOT regulations, "Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance," 49CFR part 25, and with any implementing directives that DOT or FTA may promulgate, which prohibit discrimination on the basis of sex.

e. Nondiscrimination on the Basis of Age. The recipient agrees to comply with all applicable requirements of the Age Discrimination Act of 1975, as amended (42 U.S.C. 6101 et seq.), and implementing regulations, which prohibit employment and other discrimination against individuals on the basis of age.

f. Nondiscrimination on the Basis of Disability. The recipient agrees to comply, and assures the compliance of each third party contractor and each subrecipient at any tier of the project, with the applicable laws and regulations, discussed below, for nondiscrimination on the basis of disability.

(1) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794), prohibits discrimination on the basis of disability by recipients of Federal financial assistance.

(2) The Americans with Disabilities Act of 1990 (ADA), as amended (42 U.S.C. 1201 et seq.), prohibits discrimination against qualified individuals with disabilities in all programs, activities, and services of public entities, as well as imposes specific requirements on public and private providers of public transportation.

(3) U.S. DOT regulations implementing Section 504 and the ADA include 49 CFR parts 27, 37, and 38. Among other provisions, the regulations specify accessibility requirements for the design and construction of new transportation facilities; require that vehicles acquired (with limited exceptions) be accessible to and usable by individuals with disabilities, including individuals using wheelchairs; require public entities, including a private non-profit entity "standing in the shoes" of the State as a subrecipient providing

fixed-route service, to provide complementary paratransit service to individuals with disabilities who cannot use the fixed-route service; and include service requirements intended to ensure that individuals with disabilities are afforded equal opportunity to use transportation systems.

(4) Recipients of any FTA funds should be aware that they also have responsibilities under Titles I, II, III, IV, and V of the ADA in the areas of employment, public services, public accommodations, telecommunications, and other provisions, many of which are subject to regulations issued by other Federal agencies.

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 (see Attachment XV-1). This document is mailed to sub-recipients receiving funding under the 5307, 5310, 5311, 5316 and 5317 programs. The Division of Contract Compliance is responsible for mailing the surveys and the Bureau of Public Transportation provides the listing of sub-recipients. The assessment is conducted every two years.

The Department utilizes the assessments to notify subrecipients-grantees of their obligations and responsibilities under Title VI and to monitor the subrecipients' Title VI processes and procedures for the administration and implementation of their Title VI program. The Department reviews 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 are also used to determine the training and technical assistance needs of the 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 CTDOT Title VI Policy Statement; the CTDOT Discrimination Complaint process and procedure and all applicable forms; LEP Implementation Plan Guidance for Sub-recipients; a copy of the CTDOT Title VI Poster and Brochure; and Title VI information posted on CTDOT's webpage. Sub-recipients have the option of developing their own Title VI, LEP/EJ processes or using the format provided by CTDOT to develop their program. The program must meet the requirements of the FTA Circular 4702.I A.

A full Title VI process review will be conducted on MPOs every 5 years. The Department will interview each MPO during the months of February and March 2012, to go over the deficiencies found in the Title VI, EJ and LEP plan review. All interviews will be completed by March 31, 2012. The MPOs will be required to address any areas of non-compliance as part of their scheduled quarterly reports to the Department. The MPOs will be required to document their progress towards addressing any deficiencies identified during the follow-up process review. The first quarterly report to include this information will be dated July 15, 2012 – for the previous quarter (April – June).

All subrecipients are directed to post their Title VI policies and complaint process on their websites and provide a notice to beneficiaries of their rights under Title VI. They are also reminded of their responsibility to post notices in areas easily visible to the public. They are informed of their responsibility to track demographic information on race, income, and English Proficiency of residents served, this information is requested to be submitted to the Department as part of the assessment.

Subrecipients are directed and required to document their efforts to ensure LEP persons have the ability to participate in their programs and activities.

More detail on the procedures the Transit Office uses to monitor subrecipients for the section 5310, 5311, 5316 and 5317 grant programs can be found in their specific subsection within Section XV.

2009 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 were not familiar with Title VI, did not understand the applicability of Title VI to their program activities, or were looking for guidance as to what they needed to do. 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.

The Assessment Surveys went out to a total of 94 Sub-recipients; 79 responses were received and 15 sub-recipients did not respond. The response rate was 84%.

In reviewing the documents, the following four major areas were reviewed:

- Do you have Environmental Justice/Limited English Proficiency 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 CTDOT's Title VI Program format?

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 CTDOT'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.

On June 2, 2010, a three hour Sub recipient Title VI training workshop was conducted by the Department's Title VI Coordinator. 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?
- Your 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

The Department mailed out the 2011 Title VI Assessment Surveys to subrecipients on August 23, 2011. The results and findings will be available upon completion of the analysis. The Department will require subrecipients who are not in compliance with Title VI to submit a corrective action plan with a time-line. These organizations will also be required to submit quarterly reports of their progress towards compliance.

For the first time, MTA Metro-North Railroad and Shore Line East rail have been added to the survey. Metro-North has been requested to submit a copy of their Title VI report to the Connecticut Department of Transportation's Office of Contract Compliance for review. The Document will be reviewed to determine if it meets the requirements under Title VI. If there are areas of the plan that do not comply with the requirements under Title VI, the Department will request an action plan and establish a time-line for Metro-North to make the appropriate corrections. The Department has requested quarterly teleconferences with Metro-North to review their ongoing compliance with Title VI and to discuss the status of any Title VI complaints filed with Metro-North relative to Connecticut based activities. The Department reviews the contents of MTA Metro-North's portion of the Title VI program that reports on the NHL service in Connecticut and monitors their Title VI activities in Connecticut.

Follow-Up Items

- The Department is looking at ways to insure that all sub-recipients are compliant with Title VI. We have included a future plan of action that consists of the following:
- To provide additional training for sub-recipients.
- To look into the feasibility of a web-based training tool.

Chapter XVI – Requested Additional Information

(Please refer to the Conditional Approval of Title VI Program in the "Attachments")

Section XVI Conditional Approval of Title VI Program May 2011-2014

Other Information Required by FTA

1. Overall Title VI Program:
Action Taken: The program pages have been numbered and are interactive with the Table of Contents. The Table of Contents now includes the corresponding page numbers and the document is dated.

The Document has been reviewed to insure that the information is in the appropriate section of the program.

Documents and references relative to the monitoring of Subrecipients, has been removed from the sections referencing "Notifying Beneficiaries of Protections under Title VI". This information is incorporated under Section XV "Monitoring of Subrecipients".

The reference to FTA LEP guidance being followed to assure that Environmental Justice is addressed in NEPA documents has been removed.

2. Inclusive Public Participation:

Requirement: Summary of public outreach and involvement activities undertaken since the last submission and a description of the steps taken to ensure that minority persons had meaningful access to these activities.

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. The Department will insure that future submissions include a breakout of activities specifically targeted to minority populations.

Chapter XIV now includes not only the Statewide Transportation Planning process but also the Public Involvement Procedures document. This document was developed in accordance with 23 CFR 450.210 and 23 CFR 771.111(h)(1) and approved by US DOT in December 2009. The Department has also referenced the Public Involvement guidance manual with includes Strategies related to engaging minority and low income populations in the planning process.

3. Access to Service by Persons with LEP:
Requirement: Submit complete four-factor analysis and language implementation plan.

Action Taken: The four-factor analysis has been completed and is included in Section V of the Title VI Program.

The Department has included additional resources to be used to obtain additional data relative to obtaining information on LEP populations in the Department's service areas.

4. Title V I Complaint Procedures:

Requirement: Include complaint processes and procedures for the public to file Title VI Complaints with CTDOT.
Action Taken: All notices and publications to the public include information on how to file Title VI complaints directly to CTDOT and the process for tracking complaints. The website has been updated to include this information as well.

The two complaints filed with CTDOT that were filed as Title VI complaints by the complainants, have now been clearly identified as not having a basis under Title VI.

5. <u>Public Notice to Beneficiaries:</u>
Requirement: Title VI specific policies should only include race, color and national origin (Section VI).

Action Taken: References other than race, color and national origin have been removed from all Title VI policy statements related only to FTA compliance. The Title VI website information has been updated to include information on who to contact for more information or to file a complaint.

Information on where the Title VI notices to beneficiaries are posted is included in Section V. All public notices have been updated to clearly state that discrimination on the basis of race, color or national origin is prohibited. A copy of the notices have been included in Section VI.

6. **Construction Projects:**
Requirement: Submit a listing of projects that have occurred and an assurance that the required environmental analysis has been performed.

Action Taken: A listing of projects is provided in Section VIII along with the appropriate environmental analysis performed.

7. <u>Equity and Evaluation of Service and Fare Changes</u>
Requirement: Existing policy submitted without Title VI considerations

Action Taken: This section has been substantially updated and is included as part of the Department's Title VI Program. An analysis of the January 2012 fare increase has been submitted as an attachment to the updated Title VI Program. A summary of the Title VI and Environmental Justice analysis of the Busway project was submitted in November 2011. The updated Title VI Program includes a revised plan for submitting the service and fare equity analysis for the Busway with deliverable dates.

8. <u>Monitoring subrecipients for compliance with Title VI</u>
Requirement: Describe monitoring for compliance

Action Taken: The Department has updated and submitted the monitoring language for sections 5310, 5311, 5316 and 5317 of the State Management Plan, has included it in the Title VI program update, and the updated language will be incorporated into the next update of the State Management Plans. This information will be submitted to FTA with the next SMP updates. Early in 2011 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 in Section XV. In addition to the Assessment Survey, the Department also periodically spot checks subrecipient's notices to beneficiaries to monitor for Title VI compliance.

Attachment A – FTA's Checklist of Requirements

Requirement: Submit corrected LEP four factor analysis and language assistance plan.
Action Taken: The corrected LEP four factor analysis and the language assistance plan is included in Section V.

Requirement: Clarify CTDOT's Title VI Complaint Procedures for Complaints regarding CTDOT's service.
Action Taken: The revised complaint procedure is included in Section IV.

Requirement: Submit a copy of CTDOT's Title VI complaint form.
Action Taken: The revised CTDOT Title VI complaint form is included in Section IV.

Requirement: Submit an updated copy of CTDOT's Title VI notification to the public and describe how and where the public is notified of Title VI protections.
Action Taken: The updated notices to the public and a description of how and when the public is notified are provided in Section VI.

Requirement: Submit a Public Participation Plan that identifies and describes CTDOT's policies/procedures for inclusive participation and ensures access to the transportation planning process for low-income and minority populations.
Action Taken: The Department's Public Involvement Plan has been included in Section XIV. This provides greater details as to the Department's policies and procedures for inclusive participation in the planning process for EJ populations.

Requirement: Submit a list of any active investigations and compliance reviews conducted by entities other than FTA that examine Title VI procedures in the last three years.
Action Taken: All Title VI investigations have been included in Section IV. There were no Title VI reviews conducted by entities other than FTA during the review period.

Requirement: Submit a signed version of the title VI program by the agency's General Manager to assure this is the current agency policy.
Action Taken: A copy of the Department's Title VI policy statement is included in Section VI. This program has a signed acknowledgement from the Transportation Commissioner.

Urbanized areas (population >200,000)
Requirement: Submit racial and ethnic data to demonstrate that CTDOT has ensured that minorities and low-income persons benefit equally from federally funded programs and services.
Action Taken: CTDOT employs procedures at the "project planning level" to determine the likely impacts of projects on low-income and minority populations. These project-level assessments are intended to ensure that we do not create a disproportionate burden or adverse impact on low-income and minority communities. On a broader level, the Department employs special community outreach procedures to ensure that low-income and minority communities have the opportunity to participate in the development of the Statewide Transportation Improvement Program and the Long Range Plan. Chapter XIV provides further details.

Requirement: Submit an update major service change policy or please clarify that the definition in the Public Participation Plan submitted is the current major service change policy used by the agency.
Action Taken: The Department has established a proactive, public involvement process that is accessible to the public and identifies and addresses transportation related issues early in the project development process. The Department has an approved Public Involvement Procedures (PIP) document which includes all aspects of public involvement for the Department. This was approved by USDOT in December 2009. The PIP has been included in chapter XIV.

Requirement: Submit service equity analysis

Action Taken: This section has been substantially updated and is included as part of Section XI of the Department's Title VI Program. The Department utilizes Option A.

Requirement: Submit fare equity analysis.
Action Taken: This section has been updated and is included as part of Section XI of the Department's Title VI Program. The Department utilizes Option A.

Requirement: Submit the results of one of the following monitoring programs: Option A- level of service; Option B-quality of service; Option C-customer survey monitoring; or locally developed monitoring.
Action Taken: The Option A methodology for monitoring has been followed. The methodology has been developed for the monitoring and analysis in accordance with the Circular. Sampling and data collection for the monitoring has been completed. The final analysis of the monitoring effort and the assessment of equity of service distribution will be submitted upon completion.

Requirement: Submit procedures/analysis used to determine that the effect of statewide planning processes is not discriminatory,

Action Taken: CT DOT is now in the process of developing equity analysis tools to assess the broader and cumulative impacts of our statewide program of projects. These special equity assessment tools will be developed for both the STIP and LRP. The goal is to ensure that our statewide transportation planning and programming process is not discriminatory toward minority and low income communities. The special equity assessment procedures will include the following:

- *Equity Assessment Chapter*. An equity assessment chapter or section will be added to both the STIP and LRP.
- *Quantitative Assessments*. A quantitative assessment methodology will be developed to analyze the distribution of projects and project funding. The methodology will be based on the general procedures identified below.
    - Identify target areas throughout the state using the 2010 census data. These target areas will identify neighborhoods where there are large concentrations of low-income or minority populations.
    - Locate these target areas on a statewide map.
    - Locate all projects on a statewide map.
    - Compare the distribution of projects and/or project funds to determine if there is an equitable distribution of projects and funds among low-income, minority, and general populations in the state.
    - The quantitative assessment will be done both for the highway program and the transit program.

- *Qualitative Assessments*. Qualitative assessments will also be done to address issues or assess policies and programs that cannot be adequately assessed with quantitative methods. These qualitative assessments might include special sessions with low-income or minority organizations to solicit their assessment of DOT proposals and also to identify transportation issues of special importance to these communities.

The goal of this assessment will be to ensure an equitable process is used that does not result in a distribution of burdens and benefits that is discriminatory.

Requirement: 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. An updated listing of all applicants and for those applicants not awarded grants for the FFY11 Section 5310 program is available. Sections 5311, 5316 and 5317 have not had new project competition procurements since the May 11, 2011 submittal.

The Department has updated the nondiscrimination language for the sections 5310, 5311, 5316 and 5317, has included it in the Title VI program update, and the updated language will be incorporated into the next update of the State Management Plans. This information will be submitted to FTA with the next SMP updates.

Requirement: Technical Assistance in a non-discriminatory manner:
Requirement: Submit process used by CTDOT to provide technical assistance to ensure non-discrimination.
Action Taken: The Department has submitted updated technical assistance language for the sections 5310, 5311, 5316 and 5317 of the State Management Plan, has included it in the Title VI program update, and the updated language will be incorporated into the next update of the State Management Plans. This information will be submitted to FTA with the next SMP updates.

Requirement: Describe how agency monitors subrecipients' compliance with Title VI and summary of results of monitoring.
Action Taken: The monitoring review process is included as part of the Department's Title VI Program. The summary of results is included in Section XV.