

MetroWest Regional Transit Authority (MWRTA)

TITLE VI PROGRAM

FFY2023-FFY2025



Reference: FTA Circular 4702.1B

Updated November 30, 2022

Title VI Program Statement

Federal Nondiscrimination Protections

Title VI of the Civil Rights Act of 1964 prohibits the discrimination of individuals on the basis of race, color, and national origin in programs or activity that receives federal financial assistance. Specifically, Title VI states that “no person in the United States shall, on the basis of race, color, or national origin (including English proficiency), be excluded from participation in, be denied the benefits of, or to be subject to discrimination under any program or activity receiving federal financial assistance.” (42 USC Section 2000d). Related federal nondiscrimination laws administered by the Federal Transit Administration prohibit discrimination on the basis of age, sex, and disability. These protected categories are contemplated within MWRTA Title VI Programs consistent with federal interpretation and administration. Additionally, MWRTA provides meaningful access to its programs, services, and activities to individuals with limited English proficiency, in compliance with US Department of Transportation policy and guidance on federal Executive Order 13166.

State Nondiscrimination Protections

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

The Metrowest Regional Transit Authority (MWRTA) is a strong supporter of civil rights in the workplace and our community; as such, we are committed to the letter and intent of Title VI of the Civil Rights Act of 1964. This Title VI Program has been adopted to document MWRTA’s adherence to non-discrimination policies in its operations.

At the discretion of FTA, information other than what is required by this circular may be requested, in writing, from a recipient or subrecipient to investigate complaints of discrimination or to resolve concerns about possible non-compliance with Title VI. If you need this information or have further questions about Title VI, please contact our Title VI Coordinator:

Eva Willens, Chief Operating Officer/Deputy Administrator
Metrowest Regional Transit Authority (MWRTA)
15 Blandin Avenue
Framingham, MA 01702
Email: eva@mwrt.com
Phone: (508) 935-2222 x7105

I Title VI Information Dissemination

In compliance with 49 CFR Section 21.9 (d) Notice to Beneficiaries of Protection under Title VI, MWRTA provides Title VI information on its website <http://mwrta.com/information/policies> . The website provides the Federal Title VI program, including contacts for people seeking additional information on the agency's Title VI program. MWRTA's website is used by our customers and employees as it is the main portal for schedules and real-time bus location information with news and updates related to the transit authority.

While MWRTA believes the website reaches many of our customers and employees, we recognize the need to provide additional outreach measures for those unable to access information via the internet. Notice to Beneficiary information regarding Title VI is also posted at our main transfer Hub located at 15 Blandin Avenue in Framingham. Many of our customers come to transfer between buses, add value to their passes, or be certified for various programs at the Hub. The information is posted in employee kitchens for both contracted and MWRTA employees. MWRTA also provides informational Title VI outreach to employees, contractors, and vendors via the monthly Hub Happenings Newsletter. To ensure that the Title VI information reaches the riding public, MWRTA posts the Notice to Beneficiary information on all fixed route and demand response vehicles. MWRTA emphasizes the importance of Title VI in its new hire orientation, and this information is available in the preferred language both electronically and in printed form.

II Subcontractors and Vendors

All contractors, subcontractors, and vendors receiving federal funds are subject to the provisions of Title VI of the Civil Rights Act. Federally funded contracts and procurements (where applicable) include non-discrimination provisions to ensure that Title VI requirements are followed. Title VI compliance remains an important element of our organization.

III Record Keeping

Eva Willens is the MWRTA's Title VI Coordinator. Ms. Willens is the agency's Deputy Administrator and a prominent decision-making employee who reports directly to the agency's Administrator. Ms. Willens maintains the agency's records and is key in the development of contracts and other Title VI relevant materials, including human resource materials.

Ms. Willens has resources available to translate the agency's Title VI policy into the languages most common to the MetroWest region, including MAPA Translations, which can provide real-time oral and written translation services. A copy of the MWRTA Title VI policy is included in the new hire employee package. Also, a log of Title VI complaints, follow-up activities, and resolutions is maintained by the MWRTA. Ms. Willens is the primary investigator of Title VI complaints for the agency. Included in the file are copies of all relevant information regarding complaints or lawsuits filed against the transit authority. A copy of the log sheet is included as an appendix to this Title VI Program.

It should be noted that at the time of the adoption of this document, the MWRTA had not received any Title VI complaints from either passengers or employees.

Title VI Program Checklist

Recipients Serving Urbanized Areas With Populations of 200,000 People or Greater

The following sections address the requirements of the Title VI Program for recipients serving urbanized areas with populations of 200,000 people or greater.

Provision: Title VI Complaint Procedures

Circular Reference: Chapter IV, Part 2

Regulations or Reference: 49 CFR 21.9(b)

Reporting Requirement: Procedures for Filing a Title VI Complaint

In order to comply with 49 CFR Section 21.9(b), recipients and subrecipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public upon request. In order to reduce the administrative burden associated with this requirement, subrecipients may adopt the Title VI complaint investigation and tracking procedures developed by the recipient.

Title VI Complaint Procedures

The MWRTA Title VI process involves a three-step process: initiation of the complaint, information gathering, and determination. MWRTA will investigate all complaints and promises a determination for the complainant within two weeks. If a person is unsatisfied with the determination, they may appeal the finding and work directly with the MWRTA Administrator to seek a different resolution. If that decision is not acceptable to the complainant, they will be referred to the Federal Transit Administration to pursue an alternate resolution.

A copy of the complaint process in English, Spanish, and Portuguese is included as Appendix A to this program.

Title VI Complaint Policy

If you feel you have been discriminated against by MetroWest Regional Transit Authority (MWRTA) staff, contractors, or service provided by the agency, please contact the MWRTA Title VI Officer - Eva Willens at 508-935-2222. Ms. Willens will request your complaint be submitted in writing using the form provided. Please include as much information as possible, including the date, time, and location of the incident. Ms. Willens will investigate the complaint and respond to you within two weeks.

If the investigation and resolution are not satisfactory, you have the right to appeal by contacting the agency Administrator, Jim Nee, who will provide a determination and a proposed resolution on the matter within two weeks. The MWRTA Administrator may be contacted at 508-935-2222.

If you remain unsatisfied with the determination and resolution of your complaint by the MWRTA, you are encouraged to contact the Federal Transit Administration (FTA) at 617-494-2055 for further determination. When contacting the FTA, please refer to Title VI complaints, and you will be redirected to the appropriate staff person.

MWRTA does not tolerate discrimination by any of its employees or contractors. It is our goal to ensure that all people are treated fairly in the provision of federally funded transit services.

A copy of the complaint form is included as Appendix B of this program.

Provision: Title VI Investigations, Complaints or Lawsuits

Circular Reference:	Chapter IV, Part 3
Regulations or Reference:	48 CFR 21.9(b)
Reporting Requirement:	List of Title VI investigations, complaints, or lawsuits filed with the agency since the last submittal

In order to comply with 49 CFR Section 21.9(b), recipients and subrecipients shall prepare and maintain a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming the recipient and/or subrecipient that allege discrimination on the basis of race, color or national origin. The list shall include the date the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient or subrecipient in response to the investigation, lawsuit, or complaint.

Upon adoption of this document, the MWRTA had not received any Title VI complaints from either passengers or employees. MWRTA has a process in place to record any investigations, complaints, and lawsuits as well as the ethnicity of MWRTA board/committee members. A copy of these templates are attached as Appendix C of this program.

Provision: Access to Services by Persons with Limited English Proficiency (LEP)

Circular Reference:	Chapter IV, Part 4
Regulations or Reference:	49 CFR 21.5(b) and DOT LEP Guidelines
Reporting Requirement:	Agency's Plan for Providing Access to meaningful activities and programs for persons with LEP based on DOT LEP guidance – or – Agency's alternative framework for providing access to activities and programs

Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to benefits, services, information, and other essential portions of their programs and activities for individuals who are Limited English Proficient (LEP).

Developing a Language Implementation Plan. Recipients and subrecipients can ensure that LEP persons have meaningful access to their programs and activities by developing and carrying out a language implementation plan pursuant to the recommendations in Section VII of the DOT LEP Guidance. Certain FTA recipients or subrecipients, such as those serving very few LEP persons or those with very limited resources, may choose not to develop a written LEP plan. However, the absence of a written LEP plan does not obviate the underlying obligation to ensure meaningful access by LEP persons to a recipient's program or activities. Recipients or subrecipients electing not to prepare a written language implementation plan should consider other ways to reasonably provide meaningful access. The elements of an effective implementation plan on language assistance for LEP persons can be found at Section VII of the Department's Policy Guidance located at 70 FR 74087 (2005).

Individuals who have a limited ability to read, write, speak, or understand English are Limited English Proficient, or "LEP." According to the 2010 US Census, more than 24 million people reported that they do not speak English at all or do not speak English very well. The number of people reporting that they do not speak English well or at all increased from 10 million in 2000 to 24 million in 2010, documenting an increased need for LEP services.

Title VI of the Civil Rights Act of 1964, 42 USC 2000d 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 versus Nichols*, 414 US 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.

To assess the needs in our community, MWRTA conducted a four-factor analysis to determine our language assistance needs and to be able to target resources appropriately.

Factor 1: The number and proportion of LEP persons served or encountered in the eligible service population.

Task 1, Step 1C – MWRTA has surveyed agency staff to determine the frequency of contact with LEP persons either through phone contact, at our customer service desk at the hub, or while using MWRTA services.

Agency call center staff observed that they received daily requests in Spanish. The agency is staffed with two Spanish-speaking call takers to address these calls. Other languages are referred to the agency's language translator.

For the most part, customers and call takers can work with the caller to meet their translation needs. However, if communication becomes a barrier, the MWRTA has retained a real-time language translator that employees can use to provide information and book trips. This service provides our customer service representatives with over 240 languages, including all languages identified in our assistance needs, in real-time translation.

The customer service desk at the transit hub is usually staffed with multi-language skilled staff. The staff has indicated they regularly have LEP individuals come in with questions, and they are able to communicate with them effectively, providing schedules or information about MWRTA routes and fares.

Discussions with drivers indicate that they have passengers who are LEP and that they are able to answer the questions intuitively, such as Donde esta la Market Basket? When translated from Spanish, Are you going to Market Basket? When a driver en route encounters a rider with a question they are unable to answer, the information is relayed to dispatch, and a person who is proficient in the appropriate language responds, if possible. Real-time translation resources are provided through the LanguageLine services. Text translation resources and services are available through MAPA Translations, the agency's language translator. MAPA translates critical documents into languages spoken by our riding public as well. Language Line is another outside resource that MWRTA utilizes for assisting with LEP situations. This telephone-based service allows for MWRTA and its contractor's employees to have language interpreters readily available by phone.

Task 1, Step 2D - Identify any concentrations of LEP persons within your service area

The following chart provides an overview of local populations five years and older who speak English “not well” or “not at all.” Data used in these Tables were provided by the American Community Survey. <https://www.census.gov/acs>. Data extracted from 2018: ACS 5-Year Estimates Data Profiles; Selected Social Characteristics.

Community	Population >5 Years	Total LEP	%LEP
Ashland	16,463	1,217	7.40%
Dover	5,792	219	3.79%

Framingham	69,629	11,182	16.06%
Holliston	13,944	268	1.93%
Hopedale	5,779	77	1.34%
Hopkinton	16,259	380	2.34%
Hudson	18,881	2,002	10.61%
Marlborough	37,501	4,709	12.56%
Milford	26,614	2,876	10.81%
Natick	33,532	1,864	5.56%
Sherborn	4,100	102	2.49%
Southborough	9,432	322	3.42%
Sudbury	17,921	530	2.96%
Wayland	12,830	493	3.85%
Wellesley	27,654	1,072	3.88%
Weston	11,331	357	3.15%
Total	327,662	27,670	8.44%

MWRTA analyzed data from the US Census Bureau’s American Community Survey to determine the proportion of the population that was LEP. Based on the Census tables, the proportion of the population who speak English “not well” or “not at all” in the MWRTA combined service area was 8.44%. The language grouping spoken after English was Portuguese/Indo-European. The language is confirmed through Census information and outreach to a variety of social service organizations, including local housing authorities and Councils on Aging.

In the MetroWest Region, over 2.41% of the service area speaks Spanish as a primary language while speaking English “not well” or “not at all.” We are not able to calculate the percentage of the population that speaks Portuguese/Indo-European and speaks English “not well” or “not at all” with the 2018 Census Bureau, which bundles Portuguese into more than 22 other languages categorized as Indo-European. Through our four-factor language analysis, the most prominent language of LEP consumers is other Indo-European languages at 3.6% of the population. Through consumer outreach, past Title VI analysis (that relied on Census data that had broken out the language category in more detail), and consultation with MAPA (our translation company), we have determined that Portuguese is the most prominent language spoken by this group.

We do know the 2014 Census had Portuguese at 1.5%. Chinese (including Mandarin and Cantonese) accounts for 1% of the service area as a primary language while speaking English “not well” or “not at all.”

It is interesting to note that 57% of the MWRTA’s LEP population is located in the service areas’ two largest communities: Framingham and Marlborough. Spanish is the dominant foreign language spoken in both of the communities, as confirmed through census and outreach data sources.

<https://www.census.gov/topics/population/language-use/about.html>

The determination of whether to show an individual language or collapse it into an aggregated category depends chiefly on the size of the population in the United States speaking that language at home. In tabulations, smaller languages are aggregated with other languages in a way that meets a certain population threshold but has some utility for translators or researchers. The simplest collapse recodes languages other than English into four major language groups: Spanish, Other Indo-European languages, Asian and Pacific Island languages, and other languages. A more detailed collapsing uses 42 non-English languages and language groups. The table below shows how more detail on the four and 42 language groups.

Four and Forty-Two Group Classifications of Languages Spoken at Home with Examples

Four Group Classification	Forty-Two Group Classification	Examples
Spanish	Spanish	Spanish, Ladino
Other Indo-European languages	French (incl. Cajun)	French, Cajun
	Haitian	Haitian
	Italian	Italian, Sicilian
	Portuguese	Portuguese, Kabuverdianu
	German	German, Luxembourgish
	Yiddish, Pennsylvania Dutch, or other West Germanic languages	Dutch, Yiddish
	Greek	Greek
	Russian	Russian
	Polish	Polish
	Serbo-Croatian	Bosnian, Croatian, Serbian
	Ukrainian or other Slavic languages	Bulgarian, Czech, Ukrainian
	Armenian	Armenian
	Persian (incl. Farsi, Dari)	Iranian Persian (Farsi), Dari
	Gujarati	Gujarati
	Hindi	Hindi
	Urdu	Urdu
	Punjabi	Punjabi (Panjabi)
	Bengali	Bengali
	Nepali, Marathi, or other Indic languages	Nepali, Marathi, Konkani
	Other Indo-European languages	Albanian, Lithuanian, Pashto (Pushto), Romanian, Swedish
	Telugu	Telugu
	Tamil	Tamil
	Malayalam, Kannada, or other Dravidian languages	Malayalam, Kannada
Asian and Pacific Island	Chinese (incl. Mandarin, Cantonese)	Mandarin Chinese, Min Nan

Four Group Classification	Forty-Two Group Classification	Examples
languages		Chinese (incl. Taiwanese), Yue Chinese (Cantonese)
	Japanese	Japanese
	Korean	Korean
	Hmong	Hmong
	Vietnamese	Vietnamese
	Khmer	Central Khmer (Cambodian)
	Thai, Lao, or other Tai-Kadai languages	Thai, Lao
	Other languages of Asia	Burmese, Karen, Turkish, Uzbek
	Tagalog (incl. Filipino)	Tagalog, Filipino
	Ilocano, Samoan, Hawaiian, or other Austronesian languages	Cebuano (Bisayan), Hawaiian, Iloko (Ilocano), Indonesian, Samoan
All other languages	Navajo	Navajo
	Other Native languages of North America	Apache languages, Cherokee, Lakota, Tohono O'odham, Yupik languages
	Arabic	Arabic languages
	Hebrew	Hebrew
	Amharic, Somali, or other Afro-Asiatic languages	Amharic, Chaldean Neo-Aramaic, Somali, Tigrinya
	Yoruba, Twi, Igbo, or other languages of Western Africa	Akan (incl. Twi), Igbo (Ibo), Wolof, Yoruba
	Swahili or other languages of Central, Eastern, and Southern Africa	Ganda, Kinyarwanda, Lingala, Swahili
	Other and unspecified languages	Hungarian, Jamaican Creole English, Unspecified

Of those languages most popular in the Metrowest as a whole, Spanish represents just over half of the speakers who speak English “not well” or “not at all” at 35%. Portuguese is the second most common language at 23%. Chinese (Mandarin/Cantonese) is the third most common language at 11%. Other languages spoken by people over five years of age who speak English “not well” or “not at all” totaling 31% are Russian, French (Creole), Vietnamese, Korean, Persian, German, Gujarati, Hebrew, Arabic, Polish, Cantonese, Japanese, Indian (not classified), Yiddish, Armenian, Khmer, Mandarin, Bengali, Czech, and Thai.

Ten of the sixteen communities in the Metrowest area have Portuguese as the dominant language for people who do not speak English “very well” or “not at all” they are Ashland, Holliston, Hopedale, Hopkinton, Hudson, Natick, Sherborn, Sudbury, Wayland, and Wellesley. Spanish is the most popular language spoken by the LEP population in Dover, Framingham, Marlborough, Milford, Southborough, and Weston.

Three languages qualify as Safe Harbor languages. Safe Harbor provision for translation of written material stipulates if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the MWRTA's written translation obligations. Those languages are Spanish, Portuguese, and Chinese Mandarin. There are 9,716 LEP people who speak Spanish as their primary language in the MWRTA service area, representing 2.41% of the population, and 6,521 LEP people who speak Portuguese, representing 1.5% of the population of the service area. The next most popular language for the LEP community in the Metrowest service area is Chinese Mandarin, with 3,087 people speaking the language representing 1% of the population.

Task 1 Step 3: Consult state and local data sources

MWRTA researched information provided by local workforce investment Boards in the MetroWest region of Massachusetts to further determine the mix of languages in the MetroWest service area.

One of the agencies researched was the 495/MetroWest Partnership, which is an entity that is comprised of organizations that synergistically work together to ensure the workforce in the Metro South/West region is healthy and thriving. Covering the area between Route 128/I495, and serving 43 communities, Metro South/West is one of the largest of the 16 workforce regions in Massachusetts.

The mission of the 495/MetroWest Partnership is to ensure meaningful access to all aspects of the Agencies' programs, services, and activities for all Limited English Proficiency (LEP) customers by providing language expertise, support, and guidance. Abiding by the values of the Commonwealth ensures that non-discrimination, equal access, and opportunity are safeguarded, promoted, and reflected in our Agency programs, services, and activities.

<https://www.mass.gov/files/documents/2019/04/16/DCS%20Staff%20PPP%20generic.pdf>

The MassHire Metro South/West Career Centers provide valuable help to low-income, unemployed adults looking to support their families in a college labor market. Job seekers are given the opportunity to upgrade their skills, making them more employable, and offered useful resources such as career counseling and resume-building software. These services open countless doors and make a difference in the lives of prospective employees and employers alike.

In the past, consumers have requested documents considered vital in the Title VI Program. We currently have the vital documents available in Spanish, Portuguese, and Chinese Mandarin. If information is needed in another language, then please contact MWRTA at (508) 935-2222.

Spanish: Si necesita información en otro idioma, comuníquese con MWRTA al (508) 935-2222.

Portuguese: Se as informações forem necessárias em outro idioma, entre em contato com MWRTA em (508) 935-2222.

Russian: Если необходима информация на другом языке, свяжитесь с MWRTA по телефону (508) 935-2222.

Polish: Jeśli potrzebne są informacje w innym języku, prosimy o kontakt z MWRTA pod numerem (508) 935-2222.

Chinese Mandarin: 如果需要其他语言的信息，请致电（508）935-2222与MWRTA联系。

Rúguǒ xūyào qítā yǔyán de xīnxī, qǐng zhìdiàn (508)935-2222 yǔ MWRTA liánxì.

The agency also researched findings by the Massachusetts Migration Policy Institute to determine LEP patterns in the region. The dominant language for people in the MetroWest region who speak English “not well” or “not at all” is Spanish, followed by Portuguese and Chinese Mandarin. In the MetroWest region, LEP individuals represent 8.44% of the population. While no individual language group meets the Safe Harbor threshold of 5% of the population, Spanish, Portuguese, Mandarin Chinese, Russian, and Polish meet the safe harbor threshold as the number of LEP speakers is greater than 1000. MWRTA used the following link to gather this information:

<https://www.migrationpolicy.org/data/state-profiles/state/demographics/MA>

Task 1 Step 4: Reach out to community organizations that serve LEP persons

MWRTA is an active participant in the community and regularly works with schools, agencies, and organizations which provide services to members of the LEP community. We provide information to these organizations directly that can be used to reach out to their clients in a “train the trainer” style model. Also, MWRTA employs a diverse workforce that shares its knowledge and skillsets. For example, MWRTA will use intermediaries to provide information to persons who do not speak English well or at all. We also hold training and informational sessions throughout the service area to get information about our services out to the community, including at the Callahan Center and the Framingham Housing Authority, where MWRTA has used translators to communicate with LEP individuals. Some of the agencies that we work with use LEP specialists who assist with training. Included in this list of organizations are hospitals and the Councils on Aging. We consult with these agencies as to the best way to distribute information to the community. Also, MWRTA partners with MAPA Translations to ensure that critical documents are translated into key languages. A list of vital documents translated into Safe Harbor languages is attached as Appendix E to this document. MWRTA is committed to making reasonable accommodations in hiring team members with disabilities.

Factor 2: The frequency with which LEP Individuals come into contact with your programs, activities, and services.

Various MWRTA staff was surveyed regarding the frequency of involvement with LEP individuals. The paratransit call center indicated that they receive calls from individuals with LEP skills less than ten times per week. If an individual needs language assistance, the call center will transfer the call to a bilingual MWRTA staff member who was hired, in part, for their language skills. Similarly, the customer service desk and main phone line of the MWRTA estimate that they interact with the LEP community daily.

Several MWRTA staff and contracted employees (including the customer service desk and dispatch) are multi-lingual. If a staff or contracted employee member that speaks the language in question is not available, all customer service staff have been trained in the use of Language Line, which will provide real-time translation services.

It should also be noted that MWRTA has translation software on its website that allows users to view the site in over one hundred languages, including those languages most common to the MWRTA and the MetroWest LEP population. MWRTA can also print out translations, as needed, of all of our important notices and information. The agency partners with MAPA Translations to ensure that key documents are translated appropriately to critical languages within the MetroWest service area. MWRTA posts relevant Title VI notices and information in Spanish, Portuguese, and Chinese Mandarin. We believe this provides our customers with information that otherwise may not be accessible to them.

Factor 3: The importance of LEP Persons of your Program, Activities, and Services

Task 3 Step 1: Identify your agency's most critical services

MWRTA views transportation as being a critical service to everyday life for all people, including those who are LEP. We provide access to jobs, medical, shopping, and educational activities, as well as recreational and social needs.

MWRTA believes that transportation is important for individuals to experience a full life. Medical trips are the most critical. MWRTA provides access to medical services on fixed route and paratransit services. MWRTA certifies individuals regardless of language skills and makes a concerted effort to hire individuals who are proficient in understanding Spanish, Portuguese, Chinese Mandarin, and the LEP languages of our service area.

Task 3 Step 2: Review input from community organizations and LEP persons

MWRTA is active in the community and seeks input on needs from agencies regularly through both formal and informal channels. The agency also receives input from customers via suggestions to drivers, the customer service desk at The Blandin Hub, via email (info@mwrt.com) on our website, or written directly to the MWRTA at 15 Blandin Avenue, Framingham, MA 01702, Attn: Eva Willens, Chief Operating Officer/Deputy Administrator. MWRTA's in-person community outreach events are consistent and frequent. Customer feedback through the various channels continues to result in requests for night and weekend service.

In June of 2020, MWRTA proudly announced the launch of its new tracking and customer information application, the CATCH App. The CATCH App is available for both Apple and Android devices. These applications are designed for smartphone use and make it easier than ever to track our vehicles and find the latest schedule information. This app provides an additional option for chatting with dispatch via text, particularly useful for hearing impaired customers. During regular business hours, dispatchers will respond to text messages received via the app in real-time. Use the buttons above on your smartphone to be directed

to the download page for the application. Customers can now track vehicles, view up-to-date schedules, receive alerts, and even live chat directly with our dispatchers from their mobile devices.

In 2020, the MWRTA began a pilot of a comprehensive microtransit program called Catch Connect, utilizing its MWRTA Catch app as the lynchpin of this new service. Catch Connect allows customers to book shared rides, provided by MWRTA drivers, to and from areas within the designated service area. There are currently three Catch Connect pilots in service. In the town of Wellesley, Catch Connect was implemented as a replacement for the fixed route, Route 8 service, which experienced historically low ridership in prior years. Catch Connect is provided by three vehicles and is available Monday- Friday from 6:45 AM - 6:45 PM.

On Saturdays and Sundays, the Authority provides Catch Connect service in the city of Framingham and the town of Natick, utilizing four vehicles. Riders can use the service from 8:00 AM - 6:00 PM. In addition, the town of Hudson, having two vehicles in use, offers service on Saturdays from 8:00 AM - 6:00 PM.

While the MWRTA has viewed microtransit as a short trip feeder to our existing fixed route, shuttle, or commuter rail system, the service has been heavily utilized by seniors, people with disabilities, students, and other historically disadvantaged populations. Ridership on Catch Connect continues to steadily increase for all pilots. Riders can connect seamlessly to fixed routes and commuter rail services. Catch Connect has increased accessibility through enhanced travel options within the Authority's existing transit system. Catch connect service provides, by default, curb-to-curb transportation with the option of door-to-door service upon request. We have also heard about the importance of on-time performance and have adjusted our schedules to more accurately reflect running times in traffic and continue to monitor performance.

MWRTA conducts outreach programs throughout the MetroWest service area. Some organizations, such as hospitals and Councils on Aging (COAs), social injustice areas have LEP outreach staff who have attended our travel training sessions where they are introduced to various routes and travel options. In cooperation with the schools, either MWRTA or the schools have been able to provide Spanish, Portuguese, and Haitian Creole translators for passengers during recent travel training sessions in FY2022 into FY2023. We have also used teletalk and text talk for deaf individuals. These events feature a translator so that individuals can ask questions regarding MWRTA services. Took advantage of training and identify opportunities for the blind and deaf through the Carroll Center for the Blind located in Newton, Massachusetts.

The MWRTA Travel Trainer is in the process of continuing this tradition. MWRTA works with the town clerks' office, the Callahan Center, and nursing homes to find the next Framingham Boston Post Cane recipient. The recipient is presented with a certificate during a small ceremony held at their place of residence. The ceremony will include a short speech about the recipient, the Mayor of the City of Framingham, staff from MWRTA, the Callahan Senior Center, and the MetroWest Daily Newspaper. Friends and family of the recipient are encouraged to join us. Pictures and a news article of the recipient will be submitted to the MetroWest Daily Newspaper and on display at the MWRTA Blandin Hub. To provide for the preservation and public awareness of the tradition and protection of the cane from loss or

damage, MWRTA has it on display at the Hub. In 2019 the Boston Post Cane was awarded to the oldest living resident in Framingham and was awarded the cane again in 2020. As we transition out of COVID, we plan to award the cane in 2023.

Factor 4: Resources available to the Recipient and Cost

Task 4, Step 1: Inventory language assistance measures currently being provided, along with the associated costs.

MWRTA provides language assistance through a variety of resources. As a small agency, low-cost solutions allow us to meet our LEP goals through the course of everyday activities.

- Website – The MWRTA website is used by the public. It is a conduit for news releases and information about our services. MWRTA uses Google Translate, a free and commonly used translation software, to allow customers to translate our website into one of 100+ languages, including Portuguese and Spanish, the most commonly spoken languages in the MetroWest Region by residents who speak English “not well” or “not at all.”
- Written materials – MWRTA provides copies of news releases and other materials, including Title VI and employment regulations, in alternative languages. Information, depending on the use, is posted at the transit hub and onboard the agency’s vehicles. MWRTA uses the simplest language possible in posting information, including illustrations when applicable, to make the message clear to riders, including those that only have limited English skills.
- Workforce - MWRTA strives to hire a diverse workforce. Foreign language skills are a definite plus for employment candidates and are thoughtfully considered in hiring decisions. MWRTA has employees in our call center who are proficient in Spanish, as well as employees who can also translate for customers who speak Portuguese and Creole. Also, the customer service desk, dispatch, and call center are staffed with multi-lingual representatives and other agency staff that have additional language skills. Callers requesting language assistance are directed to a person who is able to assist.
- MWRTA LEP CARD, see Appendix D, is similar to those used by the US Census Bureau when a customer needs language translation services, we can identify the appropriate language. Should a customer speak a language that we can not identify, the customer is presented with a card with 38 different languages. Customers are instructed to point to their language, and we will be able to use a two-way translation program to provide communication services.
- Professional Translation Services – MWRTA partners with MAPA Translations to ensure that documents are translated appropriately and to provide real-time translation services when necessary.
- sRealtime Language Translation- When a customer service representative is not available that is proficient in the language spoken by a customer, MWRTA will utilize the real-time Language Translation service in order to facilitate communications with the customer.

Task 4, Step 2 – Determine what, if any, additional services are needed to provide meaningful access.

MWRTA continues outreach to the LEP community and will continue to seek more significant outreach opportunities. An in-depth analysis of our community indicates that less than 8.44% of our service speaks English “not well” or “not at all.” We believe that most individuals can find information in their primary language easily and, if not, can request additional translated information from MWRTA staff. We are continually looking for ways to improve our outreach to the LEP community. MWRTA has three employees who are responsible for marketing and communications and are actively conducting outreach throughout the MetroWest Region. The agency participated in outreach for the Ashland Community Event in 2022. Travel training outreach to the LEP community was provided at the event.

Task 4, Step 3 – Analyze your budget

MWRTA has committed to providing LEP as an inclusive cost of our budget. LEP services are integrated into jobs with multiple functions, so the hiring of multi-lingual staff provides no additional cost to the budget despite the improved value to the system as a whole. Furthermore, computerized translation services both on our website and in the production of flyers are done through free translation programs, so there are no additional production costs. Multi-lingual staff proofread our written materials to ensure that the translations accurately reflect the information. The agency also partners with a professional translator, MAPA Translations, to ensure that critical documents are translated appropriately and that real-time translation services are available.

Task 4, Step 4 – Consider cost-effective practices for providing language services

MWRTA uses cost-effective practices, including some of those suggested in the DOT Guidance. Using translation software and relying on the existing skillsets of our employees, regardless of job title or function, are two ways we have adopted cost-effective language services. We also work with advocates in the community to assist in outreach activities and continually look for ways to improve outreach within our community. MWRTA recognizes the value and importance of professional language services and has partnered with MAPA Translations to ensure that critical documents are translated appropriately and that language translation services are available when the agency requires them.

Conclusion

MWRTA pays close attention to the LEP needs of the MetroWest Region and continually implements methods to improve outreach to all constituents, including the LEP population. MWRTA uses a combination of in-house and professional skill sets to ensure that the needs of the LEP community are addressed.

Developing an Implementation Plan on Language Assistance

The DOT LEP Guidance [DOT's LEP Guidance | US Department of Transportation](#) recommends that recipients develop an implementation plan to address the needs of the LEP population they serve. The DOT Guidance notes that effective implementation plans typically include the following five elements:

identifying LEP individuals who need language assistance, providing language assistance measures, training staff, providing notice to LEP persons, monitoring, and updating the plan.

Task 1 Identifying LEP Individuals who need language assistance

MWRTA has performed a four-factor analysis of our LEP population and identified areas and languages in which there is a concentration. Overall, the service area has a population of 8.44% of people who speak English “not well” or “not at all.” The areas where the concentration of LEP populations exceeds the area average are Framingham (16.06%), Marlborough (12.56%), Milford (10.81%), and Hudson (10.61%).

MWRTA conducts substantial outreach efforts throughout our service area. We work with local social service agencies such as housing authorities, business advocacy organizations, South Middlesex Opportunity Council (SMOC), as well as other organizations and community leaders to identify and attend events in the community. We believe that this strategy is very effective in reaching the LEP community. Through our outreach and research efforts with local agencies coupled with data-driven research, we have found that the most commonly spoken languages by the LEP community are Spanish, Portuguese, and Chinese Mandarin. A table for each community by the number of LEP speakers by language and the percentage of the population is included in this document.

Task 2: Language Assistance Measures

MWRTA utilizes a variety of language assistance tools to communicate with the LEP community. Included in this “toolbox” is a website translation software that allows the customer or agency staff to translate information regarding our system, as well as written notices which are posted in various languages in a variety of places to reach the intended audience and employee translators who are available to answer questions about the system. The agency also has the MWRTA LEP CARD, which is kept at the reception desk for public use.

If a person indicates that they speak a language that we can not translate with staff resources, we will use the Language Line services mentioned previously to communicate with the individual. The agency also partners with a professional translation service to translate critical documents and provide real-time translations.

MWRTA protocol for a person who needs language assistance on the phone: the person receiving the call will determine the language to the best of his or her ability, then forward the call to the person and or service that best meets the caller’s needs. It should be noted that MWRTA phone lines are staffed by multi-lingual individuals who speak Portuguese and Spanish. Furthermore, the paratransit call center has bi-lingual operators to assist in scheduling paratransit trips. MWRTA has received written communications in Spanish, Portuguese, and Chinese Mandarin. As a result of a system-wide survey, MWRTA used Spanish, Portuguese, and Chinese Mandarin-speaking staff or MAPA Translations to translate the comments. If a response was requested, the customer would receive a response in the language in which the original communication was received.

The MWRTA has a dedicated Central Reservations team that is comprised of a diverse group of compassionate reservationists who provide excellent customer service. The MWRTA call center is unique in that many of the reservationists have used the service, and more than 50% of the staff are disabled. Therefore, the call center staff can relate to the passengers when they call in to book their trips.

The MWRTA partners with the Massachusetts Commission for the Blind to provide software to Central Reservations and allow accessibility for employees who are blind and/or visually impaired. Even during stressful situations, the reservationists continue to work cohesively to encourage and support one another to resolve issues or conflicts that may arise.

The MWRTA has a veterans office located within the facility that is run by a local veteran who provides insight and develops projects to honor veterans across the nation. The Veterans Service Officer submits information and articles to the MWRTA Hub Happenings newsletter each month regarding various issues that concern veterans and their families. Together with the MWRTA, the Veterans Service Officer honors those men and women who have so proudly and gallantly served in our country's military. The MWRTA Manager of Travel Training and Community Relations, a veteran himself, is working with the Framingham Veterans Agent to assist Framingham in becoming a Purple Heart Community with a goal of holding an event in 2023 at our onsite Vietnam Veterans Memorial.

MWRTA's contracted service drivers who encounter Limited English Proficiency (LEP) passengers with questions they cannot answer are instructed to use the MWRTA LEP CARD and to radio into dispatch so that a staff interpreter can respond to the passenger's request. Our operating company indicates that LEP riders use the system frequently. Occasionally drivers need language assistance. MWRTA also partners with a professional translation company to ensure that should additional translation assistance be required. The agency can easily access services.

Task 3: Training Staff

Operating staff and in-house staff are trained on proper procedures for responding to LEP information requests. Discussions with call center and operating employees indicate that working with LEP populations is a regular occurrence and are aware of the proper procedures.

Task 3, Step 1 – Identify agency staff that are likely to come into contact with LEP persons as well as management staff. The agency staff who most often interact with LEP populations are the drivers. Call takers and the customer service desk also interact with LEP people on a regular basis. MWRTA staff is educated in LEP protocol, which is to transfer the call to someone who speaks the language and can best assist the customer.

Task 3, Step 2 – Identify existing staff training opportunities. New employees are trained on LEP protocols and customer courtesy when they join the transit authority. Employees who, in the course of their jobs, have questions about LEP protocol are directed to ask their supervisor for clarification.

Task 3, Step 3 – Design and implement LEP training for agency staff. LEP training is included as part of the hiring process for the MWRTA. LEP is also covered in the customer service component of training.

Common sense prevails, and when we receive calls from a person who has LEP, we find the person who can most easily converse both in terms of content and language skills. For this Title VI Plan update, staff were apprised of the document and questioned to determine their day-to-day experience with LEP and the protocols they use to address LEP needs. MWRTA continues to work with our problem-solving employees to identify additional ways that we can better conduct outreach to the community. The agency has also partnered with a professional translation service to ensure that the needs of the LEP community are addressed should an in-house interpreter not be available.

Task 4: Providing Notice to LEP Persons

Notices in dominant LEP languages are posted at the main transfer hub of the MWRTA. Passengers regularly go to the transfer hub to get information about services, add value to their passes, and register for reduced fare ID cards. The Blandin Hub is the primary transfer center for the majority of bus routes in the MWRTA system. Routes 2, 3 & 7 primarily transfer from the Intermodal at the Framingham Commuter Rail Station Banana Lot. In addition to posted notices, multi-lingual staff work at our customer service desk and assist customers at the Hub as well as those who call in. Staff at the Banana Lot are also LEP trained in order to assist customers there. If any language interpreter assistance is needed, the staff at the Banana Lot are instructed to contact the Blandin Hub. MWRTA also posts important notices on our buses to ensure that all riders have direct notification of important issues or news affecting MWRTA, including information regarding Title VI rights.

MWRTA has three employees who focus on customer outreach and marketing. The agency has implemented an aggressive community outreach program that conducts events in low-income and minority LEP neighborhoods, community centers, schools, universities, libraries, councils on aging, community fairs, farmer's markets, and other locations. Several of these events have had translators available to ensure that customers and agency staff can readily communicate.

The agency maintains customer bulletin boards and works with the media and a local radio station to provide MWRTA information to the public. MWRTA has worked with Spanish and Portuguese-speaking media and the local public television network to improve outreach to the LEP community.

Task 5: Monitoring and Updating the LEP Plan

The LEP population is part of the cumulative number of LEP speakers within the service area as a whole who require safe threshold treatment concerning the provision of information in Spanish, Portuguese, and Chinese Mandarin.

Provision: Notifying Beneficiaries of their Rights under Title VI

Circular Reference:	Chapter IV, Part 5
Regulations or Reference:	49 CFR 21.9(d)
Reporting Requirement:	Notice of compliance with Title VI and public procedures to file a discrimination complaint

In order to comply with 49 CFR Section 21.9(d), recipients and subrecipients shall provide information to the public regarding their Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI. Recipients and subrecipients that provide transit service shall disseminate this information to the public through measures that can include but shall not be limited to posting information on the agency's website.

a) Contents: the notice shall include:

1. A statement that the agency operates programs without regard to race, color, or national origin.
2. A description of the procedures that members of the public should follow in order to request additional information on the recipient's or subrecipient's nondiscrimination obligations.
3. A description of the procedures that members of the public should follow in order to file a discrimination complaint against the recipient or subrecipient.

b) Effective Practices for Fulfilling Notification Requirements: In complying with the above requirements, recipients, and subrecipients should keep the following guidance in mind:

1. Dissemination. Agencies may inform the public of their rights under Title VI through such measures as posters, comment cards, or flyers placed at stations and in transit vehicles. The type, timing, and frequency of these measures are at the recipient's or subrecipient's discretion.
2. General Notification. Agencies may include a statement of nondiscrimination on the basis of race, color, or national origin as part of a broader statement of its commitment to nondiscriminatory service. This broader statement can also include a commitment to nondiscrimination based on characteristics not covered by Title VI, such as age, gender, and disability.
3. Document translation. Notices dealing with a recipient's or subrecipient's Title VI obligations and complaint procedures should be translated into languages other than English, as needed, and consistent with the DOT LEP Guidance.
4. Subrecipients. In order to reduce the administrative burden associated with this requirement, subrecipients may adopt the Title VI Notice developed by the recipient; however, subrecipients should notify their beneficiaries that they may file discrimination complaints directly with the subrecipient.

MWRTA features Title VI information on its website <http://mwrtta.com/information/policies>. MWRTA's website is used by customers and employees as it is the main portal for schedules, real-time bus location information, news, and updates related to the transit authority. MWRTA's website includes a link to Google Translate, a common translation software that allows the site user to translate information into

100+ languages, including Portuguese/Indo-European and Spanish, the most commonly used languages in the Metrowest Regional service area, aside from English.

While MWRTA believes that our website reaches many of our customers and employees, we recognize the need to provide additional outreach measures for those unable to access information via the internet. Title VI information in key languages is posted at our main transfer Hub located at 15 Blandin Avenue in Framingham. At the Hub, many of our customers transfer between buses, add value to their passes or apply for certification for various programs. Title VI information is also posted in employee kitchens for both contracted and directly employed MWRTA employees.

MWRTA includes Title VI information in the new hire orientation for MWRTA direct hires. This information is available to employees, contracted employees, and customers in the preferred language of the individual.

Provision: Inclusive Public Participation

Circular Reference:	Chapter IV, Part 9
Regulations or Reference:	DOT Order 5610
Reporting Requirement:	Summary of public outreach and involvement activities undertaken since the last submission and a description of steps taken to ensure that minority persons had meaningful access to those activities.

In order to integrate into community outreach activities, considerations expressed in the DOT Order on Environmental Justice and the DOT LEP Guidance, recipients and subrecipients should seek out and consider the viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities. An agency's public participation strategy shall offer early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions.

a) Effective practices for Fulfilling the Inclusive Public Participation Requirement.

Recipients and subrecipients have wide latitude to determine how, when, and how often specific public involvement measures should take place and what specific measures are most appropriate. Recipients should make these determinations based on the composition of the population affected by the recipient's action, the type of public involvement process planned by the recipient, and the resources available to the agency. Inclusive efforts to involve minority, low-income people, and LEP populations in public involvement activities can include both comprehensive measures, such as placing public notices at all stations and in all vehicles, and measures targeted to overcome linguistic, institutional, cultural, economic, historical or other barriers that may prevent minority and low-income people from effectively participating in a recipient's decision making process.

Effective practices include:

- 1) Coordinating with individuals, institutions, or organizations and implementing community-based public involvement strategies to reach out to members in the affected minority and/or low-income communities.
- 2) Providing opportunities for public participation through means other than written communication, such as telephone and in-person interviews.
- 3) Using locations, facilities, and meeting times that are convenient and accessible to low-income and minority communities.
- 4) Using different meeting sizes and formats or varying the type and number of news media used to announce public participation opportunities so that communications are tailored to the particular community or population.
- 5) Implementing DOT's policy guidance concerning the recipient's responsibilities to LEP persons to overcome barriers to public participation.

MWRTA holds regularly scheduled meetings that are open to the public. These meetings include Advisory Board meetings to discuss policy and oversight, as well as customer outreach meetings within the RTA member communities. -and public office hours at the Blandin Hub to solicit input from the riding community on their experience and how we can improve our services. Board members are chief elected officials from each community or their designee. Each Board meeting is held at the MWRTA Hub facility during hours in which the transit network is running, so that system users can easily access the meetings. Due to the Covid social distancing requirement, MWRTA did not hold regularly scheduled in-person customer outreach feedback sessions. MWRTA looks forward to resuming these sessions during Q4 FY2023.

In 2022 MWRTA held several training sessions at local schools

The MWRTA LEP CARD is a form modeled on those used by the US Census Bureau so that if a person with Limited English Proficiency (LEP) wants to contribute to the conversation, a translator or translating program can be called upon. MWRTA LEP CARD is a tool that can be used to determine a non-English speaker's language. The forms ask a person, in their native language (as well as English translations), to check the box indicating what language they speak. The staff member collecting the form can then call up a translation software program so that they can communicate with the LEP individual. MWRTA has also partnered with a professional translation firm that can be contacted for real-time translation services.

Transitions Travel Training: MWRTA has implemented a Travel Training program to assist and train individuals on how to safely ride all MWRTA services. The program provides comprehensive instruction to familiarize the individual with transportation in the MetroWest area. The program not only provides a marketing and outreach opportunity for new and existing customers, but it also provides a feedback forum for MWRTA staff to hear how we are doing and how we can improve our service. Travel Training sessions have been held at public housing authorities, senior centers, health fairs, and disability advocacy organizations. The training is held during office hours when the transit system is operating and at accessible locations. MWRTA hosts Travel Training sessions at public locations or at locations that provide end-user subsidies, such as senior housing sites. We believe that the subsidized locations help us to

reach lower-income individuals who may qualify for subsidies due to income constraints. In 2022 several events, including Earth Day, MetroFest, Senator Spilka's Health Fair at Keefe Tech, hosted Council on Aging Summit, and Dementia Friendly Training were perfect opportunities to present outreach to our communities and where MWRTA provided schedules, system maps, and Travel Training for MWRTA services. MWRTA also partners with the Commission for the Blind, South Middlesex Opportunity Council (SMOC), Employment Options, and the MetroWest Center for Independent Living (MWCIL) for potential employment opportunities within our organization, Travel Training, and consumer feedback.

During the COVID-19 Pandemic from 2020-2022, the MWRTA offers 30-minute online Travel Training classes. This training was conducted through a one-on-one video conference with an MWRTA Travel Trainer. The program is currently still offered and FREE of charge.

Individuals will learn:

- How to read the MWRTA Fixed Route bus schedules
- How to read the MWRTA Fixed Route System Map
- How to use Fare Media
- Additional travel training techniques needed to travel on the bus safely and independently
- Information and training techniques helpful in using demand services

This program is an excellent opportunity to continue learning about the MWRTA Fixed Route bus system. It is the first step to preparing the rider for successful and independent travel experiences in the future.

Outcomes of the Transitions Travel Training:

- Transitioning to a more independent lifestyle
- Recognizing bus numbers
- Arriving on time and safely to destinations
- Noticing the different transfer points throughout the system
- Sureness while transferring from route to route
- Increased travel confidence
- Traveling with an awareness of your surrounding environment
- Increased knowledge of the MWRTA Fixed Route bus system
- Orientated comfortably to the Fixed Route bus system
- Navigating throughout the MWRTA Fixed Route bus system
- Staying active in the community

Also, the MWRTA participates in a wide range of community events to further engage with current and potential riders and to raise awareness of public transportation in the MetroWest region. The MWRTA believes that attending events such as the MetroFest, the MetroWest Visitors Bureau's signature event, that showcases the richness and diversity of the region's offerings, including public transit, benefits the agency allowing the MWRTA to connect with the diverse population of event attendees. The agency has also been involved with health fairs, Chamber of Commerce events, community engagement projects, etc., to continue to reach people or businesses and agencies serving people who would benefit from public transportation. The MWRTA works closely with MetroWest Center for Independent Living, South Middlesex Opportunity Council (SMOC), and the 495/MetroWest Partnership to help determine workforce transportation needs for the future. Human Resources from various companies and agencies also work with

the MWRTA to better understand employee transit needs and then have the opportunity to meet those needs in the MetroWest Region.

Black Lives Matter (BLM): BLM is an international social movement, formed in the United States in 2013, dedicated to fighting racism and anti-Black violence, especially in the form of police brutality. The name *Black Lives Matter* signals condemnation of the unjust killings of Black people by police (Black people are far more likely to be killed by police in the United States than white people) and the demand that society values the lives and humanity of Black people as much as it values the lives and humanity of white people.

On June 19, 2022, MWRTA participated with State Representative Kate Hogan at Juneteenth Freedom Day. A well attended event (hundreds).

More than 50 years ago, Martin Luther King, Jr. called urban public transportation “a genuine civil rights issue.” But as the recent wave of protests in 2020 against racial inequality illustrates, the MWRTA has provided the following resources in the monthly Hub Happenings Newsletter:

<https://www.mass.gov/files/documents/2019/02/19/Combined-2019-Multicultural-Directory-v2.pdf>

2019 Multicultural Mental Health Resource Directory - MA Department of Mental Health Office of Race, Equity, & Inclusion

<https://libguides.framingham.edu/c.php?g=775493&p=5562784>

Anti-Racism: Support Resources for People of Color

Diversity, Equity, and Inclusion (DEI): The MetroWest Regional Transit Authority (MWRTA) is a critical resource for residents and visitors alike, promoting diversity, equity, and inclusion through transportation. Health Equity is an issue for marginalized and excluded groups throughout MetroWest. This includes people of color, people of low income, seniors, and people with disabilities.

In June 2016, the MWRTA held several informational sessions on Transgender Diversity Training. The training was mandatory and was well received by MWRTA and contracted employees. MWRTA will continue to provide information and educational opportunities to all employees as part of meeting our Sensitivity Training requirements.

In October 2019, the MWRTA hosted several DEI training sessions, which were attended by MWRTA administration staff, contracted employees, as well as other members of the MetroWest community and funded by an award from the MetroWest Health Foundation. DEI training creates a safer environment by engaging people. It facilitates a caring culture, and it helps challenge behavior that can have a negative impact on safety. The MWRTA’s fixed route bus system serves riders from all walks of life. Additionally, the MWRTA demand response service provides door-to-door rides to qualified passengers, many of whom are frail, elderly, and have physical disabilities.

It has been a priority of the MWRTA to identify social injustice areas within the 16 communities that we serve and perform more focused outreach in those areas. For example: assisting the Framingham Schools with travel training students to access our fixed route system as a way to get to school, as a result of the shortage of bus drivers within the MetroWest region.

April 2022 the staff at MWRTA was at the City of Framingham Common in acknowledgment of Earth Date. During July 2022 MWRTA staff was in attendance with Governor Baker at a Memorial Event for a former member of our Advisory Board, where the Governor acknowledged how the MWRTA team plays a vital role in advocating for the needs of the disabled community. MWRTA continues to address ADA compliant issues with the City of Framingham in August and September.

MWRTA reached out to the EJ neighborhoods to distributed candy to the children at the Framingham Commuter Rail Station (FCRS). In November 2022, a Stuff the Bus Event benefitting three local food pantries for the holiday season was very successful.

Multiple objectives were accomplished during the DEI training, including:

The MWRTA held a series of training workshops for its personnel on the subject of diversity, equity, and inclusion (DEI) in June 2016 and October 2019. Topics covered included, but were not limited to, the following:

- Awareness regarding bias around race/ethnicity and other categories of historical exclusion at each of four levels (personal, interpersonal, institutional, and cultural), encouraging improved communication and workforce effectiveness.
- Experience of cultural identity as well as feelings and behaviors in cross-cultural interactions—within a safe, non-blaming learning environment that encourages people to take responsibility for their attitudes and behaviors.
- Develop skills for addressing the attitudes and conditions (often unconscious and unintentional) that perpetuate disparities in inclusion, power, and access.

While the MWRTA was unable to hold DEI training in 2020 and 2021 due to the COVID-19 pandemic, we are currently procuring a provider of DEI training and plan to resume in-person training sessions in winter/spring 2023.

One step required to advance health equity is to “change policies, laws, systems, environments, and practices to eliminate inequities in the opportunities and resources needed to be as healthy as possible.” These opportunities include, but are not limited to, employment at a fair wage, good education, safe and affordable housing, safe and clean environments, and good medical care. MWRTA helps community members, especially those who are transit-dependent, to have access to many of these opportunities, including access to employment and health care via its fixed routes and shuttles, demand response services, and hospital shuttles. MWRTA also has several environmental accomplishments that assist adjoining environmental justice (EJ) neighborhoods by reducing pollution through its CNG buses, solar PV canopy, and water reclamation systems. MWRTA is committed to health equity and demonstrates this in its business practices.

Justice40 Initiative: On January 27, 2021, President Biden signed Executive Order (EO) 14008, “Tackling the Climate Crisis at Home and Abroad,” which created a government-wide “Justice40 Initiative” that aims to deliver 40 percent of the overall benefits of relevant federal investments to disadvantaged communities. Through implementing this Administration priority, the Department has developed a methodology to identify disadvantaged communities and benefits for Justice40-covered programs, consistent with guidance from the Office of Management and Budget (OMB) and relevant statutory authorities.

DOT defines a disadvantaged community as a group of individuals living in geographic proximity to one another or sharing common conditions or group experiences (i.e., migrant workers, Native Americans) that experience cumulative burdens across economic, social, and environmental factors. Such factors include, but are not limited to, transportation, health, environment, economy, resilience, and equity. MetroWest has grown to become an incredibly diverse region within the Commonwealth and is home to numerous environmental justice (EJ) neighborhoods. According to a 2018 study conducted by Impact MetroWest, growth among minority populations has taken place fastest among Asian residents (105%), African Americans (95%), and Hispanics (92%). The region’s population is aging, with the fastest growing group being people ages 60-84. Numerous MetroWest residents belonging to these priority populations have historically been unable to access jobs, healthcare, education, and other services and opportunities. As MetroWest’s economy continues to develop rapidly, MWRTA is committed to addressing Justice40 in the region by investing in innovative public transit solutions within the region’s EJ neighborhoods. Per the 2020 Census, the Authority currently provides services to EJ neighborhoods in the communities of Ashland, Framingham, Marlborough, and Milford. Investments in MetroWest’s public transportation system will address the 7 Justice40 Initiative-covered areas, including clean transit, affordable and sustainable housing, remediation and reduction of legacy pollution, training and workforce development, climate change, clean energy and energy efficiency, and clean water and wastewater infrastructure. The MWRTA has already undertaken several initiatives to take advantage of readily available renewable energy resources through its solar canopy and water reclamation systems.

The Authority will continue prioritizing investments in a modernized transportation system that serves MetroWest’s historically underrepresented communities. The MWRTA’s goal is to enhance access to good-paying jobs, reduce the harmful effects of climate change, promote a more positive quality of life, and deliver positive social outcomes.

Ethnicity: Based on <https://statisticalatlas.com/place/Massachusetts/Framingham/Overview>, the two largest MetroWest cities of Framingham and Marlborough, along with the Town of Natick, have a combined ethnic population of 17,603 Hispanic residents, 11,598 Asian residents, and 6,721 black residents as of 2018. Also, MetroWest is home to a growing number of seniors and people with disabilities, many of whom are entirely dependent on public transportation. All of our vehicles are wheelchair accessible, and we operate a comprehensive door-to-door paratransit service for qualified seniors and people with disabilities. The MWRTA has routes throughout EJ neighborhoods within the MetroWest region, and we provide a Boston Hospital shuttle service for qualified passengers, which stops at eight different Boston area hospitals. In addition, MWRTA provides fixed route services with stops at the following hospitals: MetroWest Medical Centers in Framingham and Natick, Newton/Wellesley Hospital, Milford Regional Hospital, and Marlborough Hospital. By providing transportation to these medical facilities, MWRTA assists in further promoting health equity within the MetroWest Region.

Coronavirus (COVID-19) Pandemic: In March 2020, to slow the spread of COVID-19 (a virus identified as the cause of an outbreak of respiratory illness) and continue to transport passengers safely and effectively, MWRTA requires that all passengers of both Fixed Route and Demand Response services wear a face covering over their mouth and nose while on-board an MWRTA vehicle.

On April 22, 2020, MWRTA launched the Grocery Shuttle, a new temporary Route 4 Grocery line that shuttles residents on Framingham's southside to local supermarkets during the Coronavirus Pandemic. Buses pick up riders at the MWRTA Blandin Hub and the recreation Center on Second Street and take them to Market Basket, Roche Brothers, Wegman's at the Natick Mall, and the Intermodal at the Framingham Commuter Rail Station. The shuttle runs every hour between 7 am and 6 pm Monday through Friday. The route is designed specifically for individuals going to local grocery stores for essential shopping trips. MWRTA understands that being able to grocery shop is very important for individuals, especially in the environmental justice neighborhoods located near the MWRTA Hub. We want to provide a direct, low-risk access shuttle to and from these locations. Transit authority officials require riders to wear a facemask while riding the bus, practice social distancing on the bus, and do not ride the shuttle if they are not well or experiencing any symptoms of the coronavirus.

The MWRTA stopped enforcing fare collection during the COVID-19 outbreak. Eliminating as much driver-passenger contact as possible and not touching surfaces is important and necessary for the safety and well-being of all. In addition, MWRTA has removed access to every other seat on fixed route buses, so passengers stay a safe distance from each other. The transit system has been cleaning and sanitizing buses each night to reduce possible contamination, and drivers are given protective equipment.

Social Media: MWRTA maintains Twitter (@MWRTA), Facebook (@MetroWestRTA), and Instagram (@MetroWestRTA) accounts which provide regular updates on MWRTA's programs, events, announcements, schedule revisions, job postings, and additional information. These accounts are a popular source of information for riders and other local agencies/businesses and have led to more coverage and engagement from local media sources. These accounts allow for an additional source of communication between riders and MWRTA, where riders can ask questions or give feedback directly to MWRTA reps. MetroWest Regional Transit Authority also has a LinkedIn company page www.linkedin.com/company/metrowest-regional-transit-authority

MWRTA Consumer Feedback Office Hours: The MWRTA will perform outreach in every community (some months there will be multiple) to conduct consumer feedback office hour sessions in each of our 16 member communities. The sessions will be open to the public and will be advertised on our website, social media, and in local newspapers. Any session cancellations will be posted in these locations. Consumers of Fixed Route and Paratransit service will be able to ask questions, give comments, and address any concerns to MWRTA management related to the service provided by the MWRTA. All addressed concerns will be posted on our website after the session is completed. If unable to attend, residents will be able to submit questions and concerns to eva@mwrt.com, and will be addressed by the Manager of Travel Training & Community Relations. Due to the Covid social distancing requirement, MWRTA did not hold regularly scheduled customer feedback sessions during FY2021-FY2022. MWRTA looks forward to resuming these sessions during Q4 FY2023.

Provision: Demographic Data Collection

Circular Reference:	Chapter V, Part 1
Regulations or Reference:	49 CFR 21.9(b)
Reporting Requirement:	Demographic maps and charts prepared since the last decennial census, results of consumer surveys that include demographic information or demographic information on beneficiaries through locally developed procedures.

1. Requirement to Collect Demographic Data. In order to comply with 49 CFR Section 2.9(b), recipients to which this chapter applies shall collect and analyze racial and ethnic data showing the extent to which members of minority groups are beneficiaries of programs receiving Federal Financial Assistance. FTA recommends that recipients fulfill this requirement by implementing one or more of the following three options:
 - a) Option A: Demographic and Service Profile Maps and Charts. Recipients may prepare demographic and service profile maps and charts. These maps and charts will help the recipient determine whether transit service is available to minority and low-income populations within the recipient's service area. Maps and charts should be prepared after each decennial census and prior to proposed service reductions or eliminations (per the instructions of Section 4 of this Chapter). These maps may be prepared using geographic information systems (GIS) technology, although recipients without access to GIS may prepare maps in alternate formats. The Federal Transit Administration (FTA) recommends that recipients provide the following maps and charts:
 - 1) A base map of the agency's service area that includes each census tract of traffic analysis zone, major streets and highways, fixed transit facilities (including the alignment of fixed guideways and transit stations, depots, maintenance, and garage facilities, and administrative buildings) and major activity centers or transit trip generators (major activity centers and transit trip generators can include but are not limited to, the central business district, outlying high employment areas, schools, and hospitals). This map should also highlight those transit facilities that were recently modernized or are scheduled for modernization in the next five years.
 - 2) A demographic map that plots the above information and shades those census tracts or traffic analysis zones where the percentage of the total minority and low-income population residing in these areas exceeds the average minority and low-income population of the service area as a whole. Transit agencies may elect to produce maps that highlight separately those areas with a predominantly minority population, a predominantly low-income population, and a population that is both predominantly minority and low-income if specialized maps would assist the agency in determining compliance with Title VI. Transit agencies may also elect to produce additional maps showing the presence of individual minority populations if this information would assist the agency in determining compliance with Title VI.
 - 3) A chart for each Census tract or traffic analysis zone that shows the actual numbers and percentages for each minority group within the zone or tract and the total population for each zone. The chart should also show the total number and percentage of low-income people within each zone or tract. Those tracts where the total minority population percentage and the total low-

income population percentage exceed the system-wide average for the agency's transit service area should be highlighted in the chart.

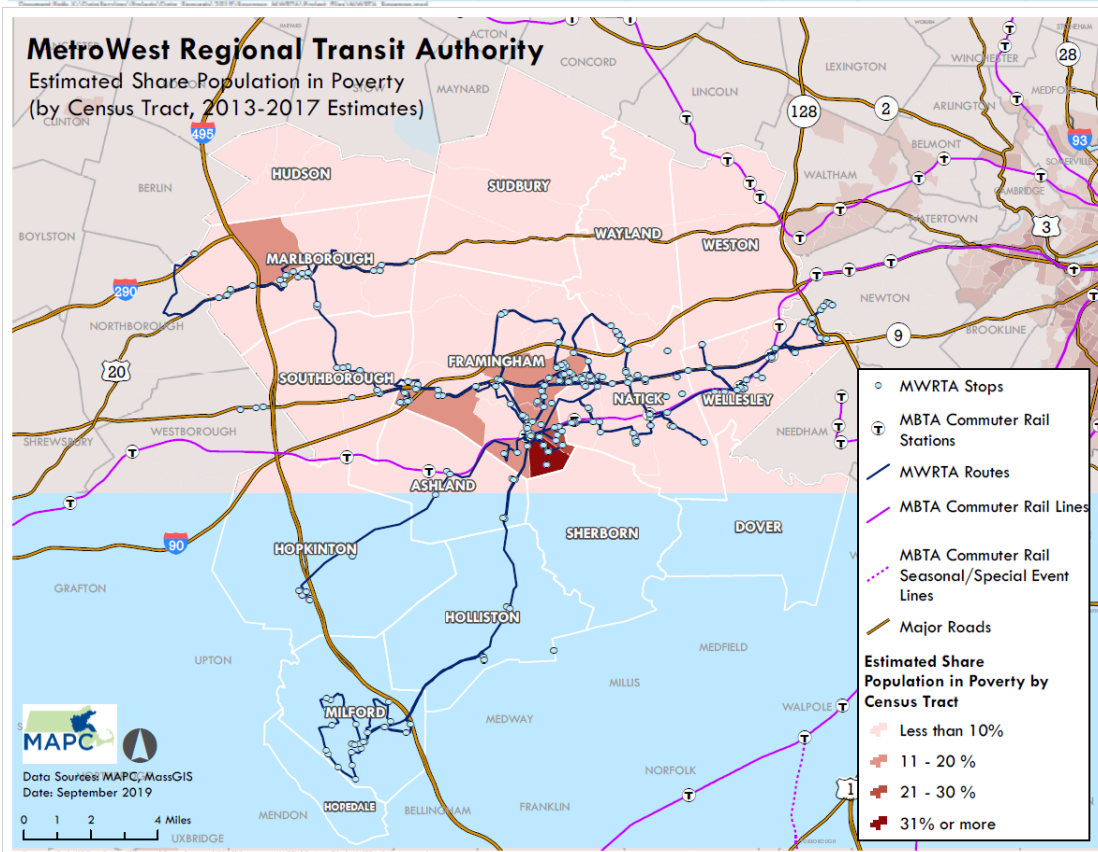
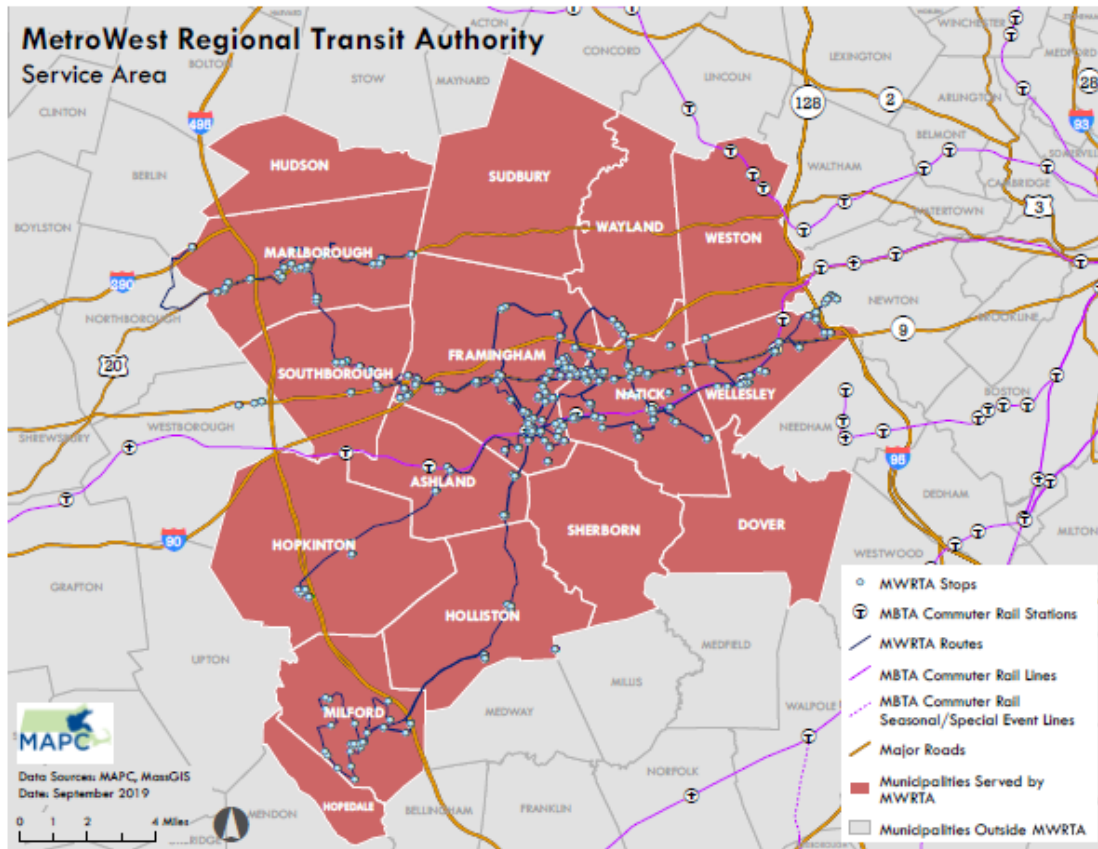
- b) Option B: Survey information on Customer Demographics and Travel Patterns. Recipients may collect information on the race, color, national origin, income and travel patterns of their riders. FTA recommends that recipients collect the following information (recipient may request additional information from their riders, as appropriate, or request different information that is more applicable to the type of service they provide):
 - 1) Information on riders' race, color, and national origin.
 - 2) Whether the rider speaks or understands English "not well" or "not at all."
 - 3) Information on riders' income or income range.
 - 4) The mode of transportation service that the rider uses most frequently (when available).
 - 5) The frequency of transit usage.
 - 6) The typical number of transfers made.
 - 7) The fare payment type and media most frequently used (when applicable).
 - 8) Rider's automobile availability.
 - 9) Rider's opinion of the quality of service they receive (this could include questions such as satisfaction with the system, willingness to recommend transit to others, and value for the fare paid).

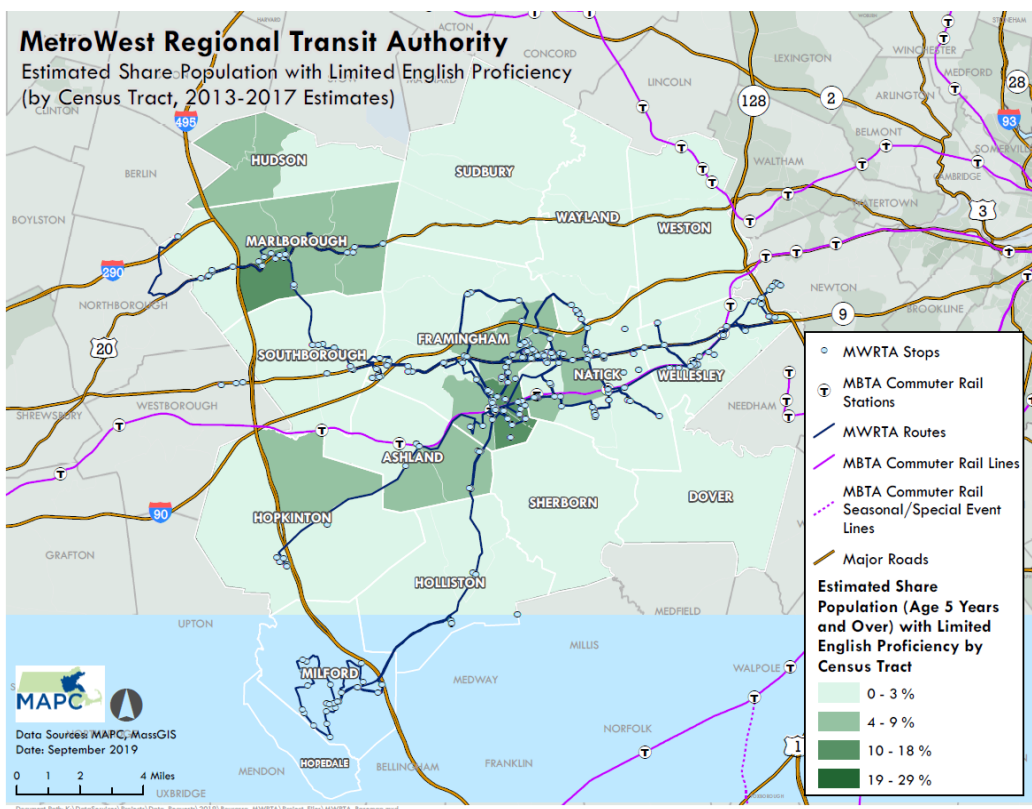
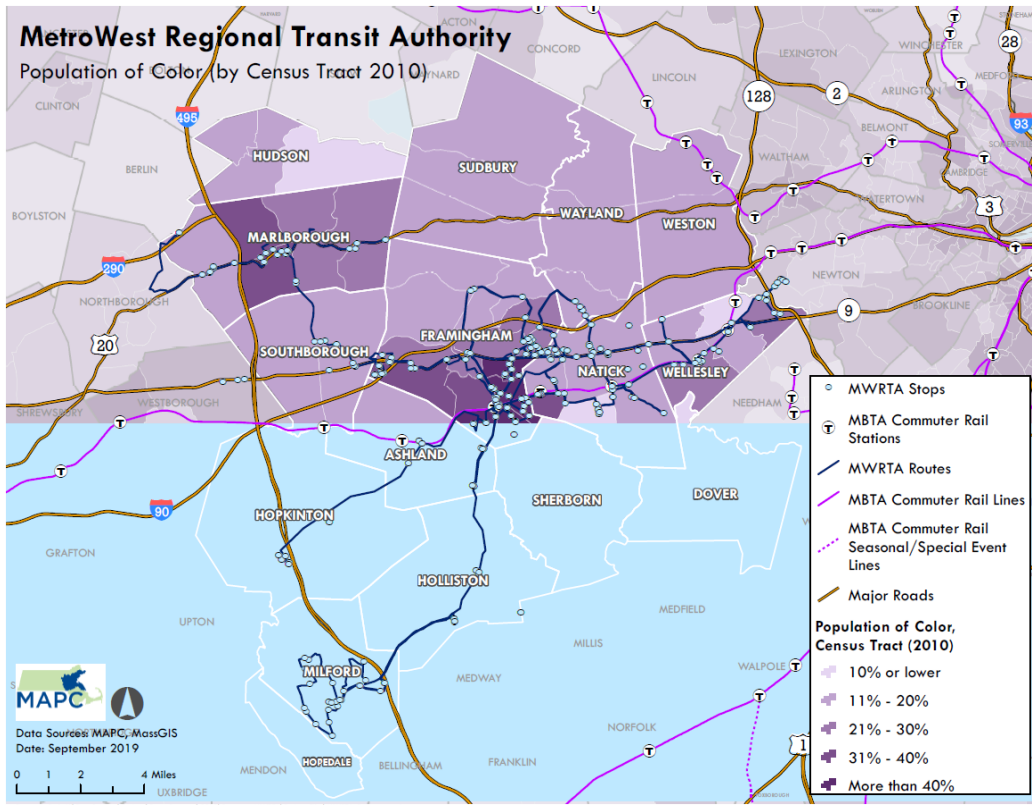
In administering the above option, grantees should keep the following guidance in mind:

- a) Timing. The information recommended in Section 1.b.(1) can be integrated into customer surveys routinely employed by transit agencies and can be collected at the time that such surveys are routinely performed.
- b) Language Access. The recipient should take steps to translate customer surveys into languages other than English or to provide interpretation services in the course of conducting customer surveys consistent with the DOT LEP guidance.
- c) Option C: Locally Developed Alternative. Recipients may modify the above options or develop their own procedures to collect and analyze demographic data on their beneficiaries. Any locally developed alternative shall meet the expectation of 49 CFR Section 21.9(b).

Option C – MWRTA had the following maps and data chart created in September 2019 to document demographics in our service area per the suggested Option A criteria.

The following maps show demographic data for the MWRTA service area as it relates to Title VI requirements: Map 1 provides a base map of MWRTA services. Map 2 is a demographic base map which uses Map 1 as a base map and highlights census tracts where individuals are below the poverty level. Map 3 uses Map 1 as a base and highlights census tracts, where the percentage of minority exceeds the average minority population of the service area as a whole. Map 4 uses Map 1 as a base map and highlights census tracts, where the percentage of LEP population exceeds the average LEP of the service area as a whole. Following the demographic maps, MWRTA has included a table with the number and percentage of low-income, minority, and LEP populations. Tracts, where the percentages of these characteristics exceed the service area as a whole are highlighted.





Census Tract	Census 2010 Population	Total Minority Population	% Minority Population	Estimated % Population in Poverty	Estimated % Population Limited English Proficiency
25017320102	5040	448	8.8889	1.34	0.59
25017320103	2795	332	11.8784	2.6	2.8
25017320104	7090	458	6.4598	1.21	0.53
25017321100	6992	1449	20.7237	4.82	3.37
25017321200	6267	1486	23.7115	4.94	4.28
25017321300	7497	2295	30.6122	5.22	9.38
25017321400	3297	469	14.2251	3.73	2.44
25017321500	6898	2099	30.4291	10.71	6.4
25017321600	7548	1748	23.1585	7.6	4.47
25017322100	4671	336	7.1933	2.97	1.55
25017322200	3687	417	11.31	2.88	2.7
25017322300	6090	855	14.0394	9.03	4.81
25017322400	4615	510	11.0509	7	4.95
25017365100	7732	821	10.6182	3.99	0.84
25017365201	5607	584	10.4156	2.52	0.3
25017365202	4320	475	10.9954	2.37	1.66
25017366100	4697	867	18.4586	4.45	1.57
25017366201	3598	405	11.2563	2.09	0.48
25017366202	4699	640	13.6199	2.4	0.52
25017367100	3959	617	15.5847	3.16	1.36
25017367200	7302	1251	17.1323	6.26	1.48
25017382100	4911	712	14.4981	0.9	0
25017382200	5158	599	11.613	2.44	1.58
25017382300	5568	586	10.5244	5.41	0.64
25017382400	4523	360	7.9593	3.6	1.93
25017382500	4418	618	13.9882	3.44	3.74
25017382601	4269	1307	30.6161	4.97	2.88
25017382602	4159	635	15.2681	4.15	1.82
25017383101	4217	2531	60.019	31.38	14.11
25017383102	4923	3782	76.8231	27.41	16.28
25017383200	6046	3117	51.5547	14.91	4.96
25017383300	3042	1049	34.4839	7.34	4.21
25017383400	5540	2659	47.9964	13.6	13.42
25017383501	4259	1795	42.146	17.43	4.09
25017383502	3773	792	20.9913	8.06	0.91

25017383600	6138	1717	27.9733	12.72	2.85
25017383700	5213	1122	21.5231	3.71	3.65
25017383800	5360	937	17.4813	3.7	0.55
25017383901	7628	1026	13.4504	3.07	1.16
25017383902	5227	844	16.1469	1.75	0.64
25017384001	1437	345	24.0084	7.21	0.7
25017384002	5515	1977	35.8477	11.06	1.52
25017385100	6717	996	14.828	3.51	1.35
25017385201	2568	510	19.8598	3.83	3.2
25017385202	7308	1557	21.3054	2.68	3.52
25017386100	4119	274	6.6521	4.16	0.22
25017387100	4257	252	5.9197	1.37	0.25
25017387201	5464	417	7.6318	1.46	1.08
25017387202	3826	233	6.0899	1.52	0.2
25021404100	4025	986	24.4969	8.66	2.35
25021404201	3658	318	8.6933	2.56	0.03
25021404202	4986	967	19.3943	4.11	1.24
25021404301	5508	686	12.4546	4.48	0.79
25021404302	3529	569	16.1235	0.99	0.6
25021404400	6276	1395	22.2275	4.76	0.36
25021405100	5589	490	8.7672	0.76	0.28
25027741101	4478	577	12.8852	4.65	0.93
25027741102	5289	785	14.8421	4.52	0.29
25027744101	7445	953	12.8005	7.13	1.26
25027744102	5258	649	12.3431	4.63	0.93
25027744200	7484	1319	17.6243	5.52	1.31
25027744300	3838	1169	30.4586	13.58	9.99
25027744400	3974	805	20.2567	11.74	3.43
25027745100	5896	5911	5.9212	4.24	0.85

Data	Source	Note
Census 2010 Population	U.S. Census 2010	
Total Minority Population	U.S. Census 2010	Calculated by subtracting Non-Hispanic, White population from Total Population
% Minority Population	U.S. Census 2010	Total minority population divided by total population
Estimated % Population in Poverty	American Community Survey 5-Year Estimates 2013-2017	ACS table B17001 Poverty Status in the last 12 months; this value is an estimate
Estimated % Population Limited English Proficiency	MAPC calculation from American Community Survey 5-Year Estimates 2013-2017	ACS table B16004 Home Language English Ability; aggregate of estimated % population that does not speak English well and estimated % population that does not speak English at all

9.14% Poverty; 25% Minority Average; 4.47% LEP

Provision: Service Standards

Circular Reference:	Chapter V, Part 2
Regulations or Reference:	49 CFR 21.5(b)(2); 49 CFR 21.5(b)(7); Appendix C to 49 CFR 21
Reporting Requirement:	System-wide Service standards (such as standards for vehicle load, vehicle headway, distribution of transit amenities, on-time performance, transit availability, and transit security)

- 1) **Vehicle load** – Vehicle load can be expressed as the ratio of passengers to the number of seats on a vehicle during a vehicle's maximum load point. Vehicle load is generally measured at peak and off-peak times and on different modes of transit. When recipients observe that vehicle load on certain routes is consistently exceeding its service standard, they should consider adding additional vehicles or expanding the capacity of vehicles serving that route. Recipients may set different vehicle load standards for peak and off peak times and for different modes of transit service.

The MWRTA is a suburban transit system which has limited capacity problems on its vehicles. The fixed route fleet is currently comprised of 37 - 16 passenger buses and 6 - 12 passenger buses, and ridership on the vehicles is such that capacity constraints occur inconsistently on a few prime-time commuter runs. MWRTA monitors ridership on a daily basis for routes with the highest ridership and considers adding service to encourage greater usage. The demand response fleet consists of a mix of 4, 8, and 12-passenger vehicles. MWRTA schedules demand response trips so that the passenger load cannot exceed the available seated capacity on the vehicle. MWRTA also monitors the timeliness of the demand response service to ensure that there is a sufficient fleet available to cover the demand.

MWRTA Service Standard for Vehicle Load

MWRTA fixed route passengers will have a seat available to them except in instances of peak periods in which it is acceptable for passengers to stand on the vehicle. Fixed Route passengers are asked to hold packages in their laps during peak periods to ensure that as many seats as possible are available.

- 2) **Vehicle Headway** - Vehicle headway is the time interval between two vehicles traveling in the same direction on the same route. The frequency of service is a general indication of the level of service provided along a route and a component of the amount of travel time expended by a passenger to reach his/her destination. It is generally expressed for peak and off-peak service as an increment of time (e.g. peak: every 15 minutes; and off-peak: every 30 minutes). Recipients may set different vehicle headway standards for different modes of transit service (such as bus, rail, bus rapid transit, and commuter rail). A vehicle headway policy might establish a minimum frequency of service based on population density. For example, a 15-minute peak and 30-minute off-peak service might be the standard for routes serving the most densely populated portions of the service area. Thirty (30) minute peak hour service might be the standard in less densely populated areas. Headway policy is typically related to vehicle load. For example, a policy might state that service frequency will be improved first on routes that exceed the load factor standard or on routes that have the highest load factors.

MWRTA's goal is to provide service at intervals that are conducive to encouraging the public to use public transit as a viable alternative to a private automobile. Presently MWRTA vehicle headways are determined by funding availability and ridership. On those routes with the highest ridership, MWRTA operates more frequent service, and those routes which are commuter based have schedules based on peak commuting hours. MWRTA has a goal of getting to 60-minute and 30-minute headways (based on ridership demand) across its system. However, service levels will be determined by funding availability.

MWRTA Service Standard for Vehicle Headways

MWRTA routes will be operated on regular intervals based on ridership and route purpose (i.e., commuter based versus trunk lines).

Based on funding availability, routing, and ridership, MWRTA strives for a minimum of hourly service on all routes, with the exception of special purpose trips, such as commuter-based trips in which limited frequency is appropriate.

- 3) On-time Performance - On-time performance is a measure of runs completed as scheduled. This criterion must define what is considered "on time." For example, it may be considered acceptable if a vehicle completes a scheduled run within five minutes of the established schedule. The percentage of times that vehicles on a particular route or line complete runs within this standard are then measured. An acceptable level of performance must be defined. For example, an agency might define on time as 95% of all runs on a particular route or line completed within the allowed on-time window (e.g., five minutes).

MWRTA defines a route as being on time if it leaves the transit hub within 5 minutes of its scheduled block start time. MWRTA's service standard is that 97% of all of its route starts will be "on-time." For demand response service, MWRTA provides our customers a "promise time," the time in which the vehicle will arrive at the origin of their trip request. A trip is considered "on time" if the trip arrives between 0 - 15 minutes after the promise time.

MWRTA Service Standard for On-time Performance

MWRTA's service standard is defined as 97% of its route starts leaving the transit hub within 5 minutes of the scheduled trip time. Also, 97% of the demand response trips will arrive within 15 minutes of the promise window.

- 4) Distribution of Transit Amenities - Transit amenities refer to items of comfort and convenience available to the general riding public. These items include, but are not limited to, benches, shelters, route maps, timetables, trash receptacles, and intelligent transportation systems (such as electronic fare payment and vehicle arrival information displays) along bus routes and at fixed guideway stations and elevators. Transit agencies may set different service standards for the different modes of service that they provide. Policies or standards in this area address how these amenities are distributed within a transit system, and the manner of their distribution determines whether transit users have equal access to these amenities. Standards for the installation of transit

amenities along bus routes are often based on the number of passenger boardings that occur at stops along the routes. Transit agencies should not set standards for amenities such as bus shelters that are solely installed and maintained by a separate jurisdiction, such as a municipality. Transit agencies should set standards for amenities such as bus shelters that are installed and maintained under a contract between the transit authority and the private entity. In these cases, the transit agency should communicate its service standard to the private entity.

The MWRTA has identified the following transit amenities: The CATCH App is a tracking and customer information application available for both Apple and Android devices. These applications are designed for smartphone use and make it easier than ever to track our vehicles and find the latest schedule information. Use the buttons above on your smartphone to be directed to the download page for the application. Customers can now track vehicles, view up-to-date schedules, receive alerts, and even live chat directly with our dispatchers from their mobile devices.

ITS equipment including global positioning systems (GPS) that provide real-time vehicle locations to customers online, automated passenger counters (APCs), monitors, stop annunciators, cameras, bus shelters, and signage. MWRTA requires all vehicles to be equipped with the same level of amenities, including ITS equipment and fareboxes.

Our transit hub is located within an environmental justice (EJ) neighborhood with a high proportion of minorities and low incomes. MWRTA has identified the expansion of passenger amenities as a priority for the future. It is our belief that passengers will benefit from a more comfortable transit experience. Amenities will be distributed based on the number of passengers at a location, ADA spatial requirements, and our ability to secure the right to install the sign or shelter by the municipality or property owner. MWRTA does not own shelters but rather encourages communities to install and maintain them.

MWRTA Service Standard for Distribution of Transit Amenities

MWRTA requires that all vehicles have consistent amenities when placed in service, including ITS capabilities such as real-time GPS

MWRTA does not own or maintain any shelters or benches other than those located at the agency's hub at 15 Blandin Avenue and Framingham Commuter Rail Station at 1 Franklin Street in Framingham. MWRTA has initiated a signage plan, which is installing bus stop signs at locations with high boardings. Sign locations are negotiated with the business or community.

In 2020, the newly constructed residential Buckley Apartments, on a 6.7-acre site in the City of Framingham, is located in close proximity to beautiful Farm Pond, Downtown Framingham, and numerous retail options on Route 9. The property has installed an MWRTA bus stop located on-site for the convenience and accessibility of their residents, with direct access to the nearby Framingham commuter rail station, and is close to Route 9 and the I-90 (the Mass Pike).

- 5) Service Availability – Service availability is a general measure of the distribution of routes within an agency's service area. For example, a policy might be to distribute service so that 90 percent of

all residents in the service area are within one-quarter mile of bus or rail service. A policy might also indicate the maximum distance between stops along bus routes. These measures of coverages and stop distances might also vary by population density. For example, in more densely populated areas, the standard for bus stop distances might be shorter distance than it would be in suburban or rural areas. In less densely populated areas, the percentage of the total population within one-fourth mile to routes or lines might also be lower. Commuter rail availability standards might include a threshold of residents within a certain driving distance as well as within walking distance of the stations. The standard of policies covering this area applies to the existing services as well as proposed changes in the levels of service (e.g. expansion, addition, or deletion of routes).

MWRTA service is financed through a combination of resources: Federal, State, and Local. Decisions to add a new service are contingent upon a number of factors, including a local community's ability to provide operating funds for the proposed service. In determining new services, MWRTA considers need, potential ridership, available funding, origins, and destinations. Currently, most of our routes provide flag-down service.

MWRTA Service Standard for Service Availability

MWRTA member communities determine the level of service provided in their area by the level of financial support they provide to the MWRTA. MWRTA will determine, within those towns, routing to ensure that service is provided equitably.

MWRTA services will travel primarily on main roads; however, at the request of a passenger, the bus can deviate within a short distance of the route. Routes are designed to be in tune with potential trip origins or destinations, including group homes, senior centers, employment centers, shopping, medical, educational, or recreational facilities. High-density areas, low-income areas, or areas with high levels of transit-dependent populations will be given consideration and preference in routing decisions.

MWRTA has undergone an extensive comprehensive transit plan review with contractor AECOM in cooperation with MassDOT to review available service in the region, review needs, and discuss areas for expansion in the future. This review has included a comprehensive market evaluation reviewing transit-dependent populations, including historically underprivileged groups, and discusses potential expansions for service availability.

In August 2020, the MetroWest Regional Transit Authority (MWRTA) expressed interest in having Central Transportation Planning Staff (CTPS) assist the Authority in identifying areas of the MWRTA service area that could be best served by a new microtransit program that is being developed by the Authority. The objective of this project is to review ridership and demographic data and assist MWRTA in determining a location or locations to implement the initial microtransit service.

Provision: Service Policies

Circular Reference:	Chapter V, Part 3
Regulations or Reference:	49 CFR 21.5(b)(2); 49 CFR 21.5(b)(7); Appendix C to 49 CFR 21
Reporting Requirement:	System-wide Policies (such as policies for vehicle assignment or transit security)

In order to comply with 49 CFR Section 21.5(b)(2) and 49 CFR Section 21.5(b)(7), Appendix C to 49 CFR part 21, recipients to which this chapter applies shall adopt system-wide service policies necessary to guard against service design and operational policies that have disparate impacts. System-wide policies differ from service standards in that they are not necessarily based on a quantitative threshold.

Vehicle assignment. Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and routes throughout the system. Policies for vehicle assignment can be based on the age of the vehicle. For example, a recipient may have a policy to assign vehicles to depots so that the age of the vehicles at each depot does not exceed the system average. The policy could also be based on the type of vehicle. For example, an agency could assign vehicles with more capacity to routes with higher ridership and/or during peak periods. The policy could also be based on the type of service offered. For example, certain types of vehicles could be assigned for express or commuter service. Agencies deploying vehicles equipped with technology designed to reduce emissions may set a policy for how these vehicles will be deployed throughout the service area. For example, a policy could be to distribute vehicles so that the level of emissions per bus at each depot is comparable.

All MWRTA fixed route vehicles and paratransit vehicles are assigned to one bus garage. Buses are randomly assigned to routes to ensure that buses receive equal wear and tear (mileage) and that vehicles are disbursed throughout the entire service area without prejudice. This system also reduces driver complaints over his or her vehicle assignment.

For paratransit service, vehicles are randomly scheduled with the exception of the type of vehicle and whether a customer has a restriction to only use a particular type of vehicle, such as a transit van. Being assigned solely to one type of vehicle requires a customer to produce a doctor's sign-off that one vehicle type is preferable to another due to a physical or mental constraint. This is considered when scheduling, if possible; however, cannot be guaranteed.

MWRTA Service Policy for Vehicle Assignment

MWRTA rotates its fixed route fleet throughout each of the routes to ensure that mileage on each vehicle is roughly equivalent and that all vehicles operate on all routes.

For paratransit service, computer software randomly assigns trips to vehicles based on customer vehicle type and routing efficiency.

Transit security – Transit security refers to measures taken to protect a recipient’s employees and the public against any intentional or threat of violence or personal harm, either from a criminal or terrorist act. These actions include, but are not limited to, deploying surveillance technology and security personnel along routes and stations, implementing security training programs for employees and security awareness programs for the public, and conducting inspections of facilities and passengers. Decisions to provide a greater level of security at some but not all of the recipient’s fixed guideway stations in the area or along some but not all of a recipients transit routes should be based on neutral criteria such as assessment of threats to facilities, data showing higher levels of criminal activities at certain facilities or in vehicles traveling along certain routes, or objective information that leads officials to believe that certain facilities or routes are more likely to be at risk. Policies associated with observing suspicious activity should ensure that suspicious activity is observed without regard to race, color, or national origin.

MWRTA takes security issues seriously as it is responsible for the security of its passengers, personnel, and assets. MWRTA implements security measures that protect these assets without regard to the area or demographic characteristics of the population in which the asset is located. Physical assets are protected at their permanent garaging location as well as while in use. Passengers, personnel, and assets are protected through the use of stationary and mobile security devices such as cameras and mobile i-drive onboard cameras. The agency’s transit hub has additional safety equipment, including alarms, fire suppression systems, and a fenced-in lot (with open access at the 15 Blandin Avenue entrance/exit).

MWRTA Service Policy for Transit Security

MWRTA has installed and maintains security equipment to protect its personnel and assets at its transportation Hub, including cameras, security systems, alarms, fire suppression systems, and a fenced-in lot (with open access at the 15 Blandin Avenue entrance/exit). Images from the facility camera systems shall be kept on file for a period of at least two weeks. MWRTA facility personnel are trained to access and monitor camera footage.

All MWRTA vehicles are equipped with cameras that are automatically activated in case of an accident or upon manual activation by the driver in case of an onboard incident. The cameras record any accident or incident with real-time images to be used in the investigation of an event. Incident-based images from the camera systems are kept on file for a period of at least two weeks. MWRTA maintains continuous feed recording devices on all vehicles that capture audio and video.

Provision: Equity Evaluation of Service and Fare Changes

Circular Reference:	Chapter V, Part 4
Regulations or Reference:	49 CFR 21.5(b)(2); 49 CFR 21.5(b)(7); Appendix C to 49 CFR 21
Reporting Requirement:	Analysis of impacts on minority and low-income populations of any significant service and fare changes that occurred since the previous report

In order to comply with 49 CFR Section 21.5(b)(2), 49 CFR Section 21.5(b)(7), and Appendix C to 49 CFR part 21, recipients to which this chapter applies shall evaluate significant system-wide service and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact. For service changes, this requirement applies to “major service changes” only. The recipient should have established guidelines or thresholds for what it considers a “major” change to be. Often, this is defined as a numerical standard, such as a change that affects 25 percent of the service hours of a route. FTA recommends that recipients evaluate the impacts of their service and/or fare changes using one of the following two options:

Option A: Recipients are encouraged to evaluate the impacts of proposed service and fare changes according to the following procedures:

1. Assess the effects of the proposed fare or service change on minority and low-income populations.
 - a) Route Changes: For proposed major service changes that would reduce or expand the frequency of service or add or eliminate routes, the recipient should produce maps of the routes that would be eliminated, reduced, added, or expanded, overlaid on a demographic map of the service area, that highlights those Census tracts or traffic analysis zones where the total minority and low-income population is greater than the service area average.
 - b) Span of service: For the proposed changes that would reduce or expand hours and days of service, the recipient should analyze any available information generated from ridership surveys that indicate whether minority or low-income riders are more likely to use the service during the hours and/or days that would be eliminated.
 - c) Fare Changes: For proposed fare changes that would increase or decrease fares on transit modes or by fare payment type or payment media, the recipient should analyze any available information generated from ridership surveys indicating whether minority or low-income riders are more likely to use the mode of service, payment type, or payment media that would be subject to the fare increase.
2. Assess the alternatives available for people affected by the fare increase or major service change.
 - a) Service Changes: For proposed service changes, the recipient should analyze what, if any, modes of transit or transit routes are available for people affected by the service expansions or reductions. This analysis should compare the travel time and cost of the current route with the travel time and cost to the rider of the alternatives.

- b) Fare changes: For proposed fare changes, the recipient should analyze what, if any, alternative transit modes, fare payment types or fare payment media are available for people affected by the fare change. This analysis should compare the fares that are paid under the change with fares that would be paid through available alternatives.
- 3. Describe the actions the agency proposes to minimize, mitigate, or offset any adverse effects of proposed fare and service changes on minority and low-income populations.
- 4. Determine, which, if any, of the proposals under consideration would have a disproportionately high and adverse effect on minority and low-income riders. Recipients can implement a fare increase or major service reduction that would have disproportionately high and adverse effects provided that the recipient demonstrates that the action meets a substantial need that is in the public's best interest and that alternatives would have more severe adverse effects than the preferred alternative.

Option B: Locally Developed Evaluation Procedure. Recipients have the option of modifying the above option or developing their procedures to evaluate significant system-wide service and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact. This locally developed alternative shall include a description of the methodology used to determine the impact of the service and fare change, a determination as to whether the proposed change would have discriminatory impacts, and a description of what, if any, action was taken by the agency in response to the analysis conducted.

MWRTA defines a "major service change" as the addition of any new bus route or removal of any bus route which has been in service for more than three years. MWRTA allows all routes to be adjusted within the first three years of service to iron out routing or schedule issues. In addition, three years is the MWRTA trial period for "pilot program" routes. Several of MWRTA's bus routes were initially developed as pilot programs that were funded with temporary resources. At the end of the trial period, MWRTA meets with local communities and or businesses, who may consider providing long-term and sustainable funding for the continuation of the route.

In the event of future changes to routing or fares, the MWRTA would adopt Option B: Locally Developed Evaluation Plan. The steps in this plan are outlined below:

Equity Evaluation to Route Changes:

MWRTA allows routes a three-year trial period during which time any new route may be modified to accommodate minor changes to the running time or routing based on operational experience. After this time period is complete, the route is presented to the local MWRTA community, which will determine if they will fund the route based on information regarding demographics, ridership, and the location the route serves. Local communities must make the ultimate decision if a route remains in existence as they provide funding for the services.

Major changes are defined as changes to the route of more than 25% of service hours or miles that require a more thorough assessment. These changes must be examined to determine the potential impact on minority or low-income populations. MWRTA uses census information as well as knowledge of local low-income geographies, such as the location of subsidized housing or low-income resources such as clinics, to assess the impact of such changes. MWRTA will take into consideration accessibility and alternative transportation options as part of the decision-making process. MWRTA meets proactively with community leaders to discuss the changes to community program locations to ensure that we serve places of interest for our passengers.

MWRTA has a Chief Operating Officer/Deputy Administrator, Fixed Route and Demand Response Managers, Director of Travel Training and Senior Relations, and Administrative Assistant/Operations who interact with MWRTA committee members to ensure open communication to discuss any changes that will affect the community.

Equity Evaluation of Changes to the Fare Policy:

MWRTA will assess how changes to the fare policy will affect minority and low-income communities in comparison with non-minority or higher-income communities to ensure that the burden does not unfairly target minority or low-income riders. Steps may include determining the validity of “zones” and their geographic definition or the use of discounted multi-ride passes.

MWRTA presently has a single bus fare for all bus routes. Full Adult cash fare is \$1.50, and CatchCard rates are \$1.25. MWRTA will also be adding a monthly pass option for fixed route riders at the cost of \$20.00 for adults. This is not deemed a major change as all available fare options remain. For Demand Response service, MWRTA’s ADA one-way fare is \$2.00 for each passenger and companion. PCAs travel for free with the passenger they are assisting.

MWRTA conducts regular and reoccurring fare reviews to ensure equity.

Provision: Monitoring

Circular Reference:	Chapter V, Part 5
Regulations or Reference:	49 CFR 21.5(b)(2); 49 CFR 21.5(b)(7); Appendix C to 49 CFR 21
Reporting Requirement:	Results of either level of service monitoring, quality of service monitoring, analysis of customer surveys, or locally developed monitoring procedure.

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 a minimum of 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.

FTA recommends that recipients fulfill this requirement by implementing at least one of the following four service monitoring procedures:

Option A: Level of Service Methodology

- 1) MWRTA is partnering with MassDOT to monitor the level and quantity of its service which will include those routes that provide service to predominantly minority and low-income areas.
- 2) MWRTA will assess route performance based on a system of performance metrics that incorporate performance targets relevant to ridership, customer service and satisfaction, asset management, and financial performance.
- 3) MWRTA performance targets shall be measured against established baselines and include a timeline for implementation.
- 4) In cases where the service does not meet the stated service policy or standard target, MWRTA will take corrective action and develop a Performance Improvement Plan to improve the progress on the attainment of the targets.
- 5) MWRTA has worked closely with MassDOT in the development of a 5-year plan, which included a review of levels of service available and discussed potential areas for increase and expansion.

Option B: Quality of Service Methodology

- 1) Recipients should identify an appropriate number of Census tracts or traffic analysis zones that represent a cross-section of the recipients population. A portion of this sample should include census tracts of traffic analysis zones where minority and/or low-income residents predominate. Recipients should keep in mind that the greater the sample size, the more reliable the results.
- 2) Recipients should identify the most frequently traveled destinations for riders using the recipients service.
- 3) For each of the three most frequently traveled destinations, recipients should compare the average peak hour travel time to destination, average non-peak hour travel time to destination, number of transfers required to reach the destination, the total cost of the trip to reach the destination, and cost per mile of a trip to the destination for people beginning the trip in the selected census tracts to traffic analysis zones.
- 4) If disparities exist in any of these factors along the trips to any of the destinations analyzed, recipients should determine whether the differences are significant. FTA recommends that recipients employ standard statistical tests for significance to make this determination.
- 5) If significant disparities in one or more quality of service indicators have been confirmed, recipients should determine why the disparity exists and take corrective action to correct the disparity.

Option C: Title VI Analysis of Customer Surveys

- 1) For their most recent passenger survey, recipients should compare the responses from individuals who identified themselves as members of minority groups and/or in low-income brackets, and the responses of those who identified themselves as white and/or middle and upper-income brackets.

- 2) To the extent that survey data is available, recipients should determine whether the different demographic groups report significant differences in travel time, number of transfers, and overall cost of the trip or if different demographic groups gave significantly different responses when asked to rate the quality of service, such as their satisfaction with the system, willingness to recommend transit to others and value for the fare paid.
- 3) If the agency concludes that different demographic groups gave significantly different responses, it should take corrective action to address the disparities.

Option D: Locally Developed Alternative

Recipients have the option of modifying the above options or developing their own procedures to monitor their transit service to ensure compliance with Title VI. Any locally developed alternative should be designed to ensure the agency's service meets the expectations of 49 CFR Part 21, as illustrated by the example in Appendix C of the same, which provides that "no person or group of persons shall be discriminated against with regard to the routing, scheduling or quality of service of transportation service furnished as part of the project on the basis of race, color, or national origin."

APPENDIX A

Title VI Complaint Policy in English, Spanish, Portuguese, and Chinese Mandarin

Title VI Complaint Policy

If you feel you have been discriminated against by MWRTA staff/contractors or service provided by the agency, please contact the MetroWest Title VI Officer - Eva Willens at 508-935-2222. Ms. Willens will ask you to submit your complaint in writing using the form provided. Please include as much information as possible, including the date, time, and location of the incident. Ms. Willens will investigate the complaint and respond within two weeks.

If the investigation and resolution do not satisfy you, you have the right to appeal by contacting the agency's Administrator, Jim Nee, who will provide a determination and a proposed resolution on the matter within a two-week period. The MWRTA Transit Administrator may be contacted at 508-935-2222.

If you remain unsatisfied with the determination and resolution of your complaint by the MWRTA, you are encouraged to contact the Federal Transit Administration at 617-494-2055 for further determination. When contacting the FTA please refer to Title VI complaints.

MWRTA does not tolerate discrimination by any of its employees or contractors. It is our goal to work with you to ensure that all people are treated fairly in the provision of federally funded transit services.

Título VI de las reclamaciones

Si usted siente que ha sido discriminado por el personal MWRTA / contratistas o servicio prestado por la agencia, por favor ponte en contacto con el MetroWest título oficial de VI - Eva Willens al 508-935-2222. La Sra. Willens le pedirá que presente su queja por escrito en el formulario previsto. Por favor, incluya tanta información como sea posible, incluyendo la fecha, hora y lugar del incidente. La Sra. Willens investigará la denuncia y en contacto con usted dentro de dos semanas.

Si la investigación y la resolución no le satisface, usted tiene el derecho de apelar en contacto con la administradora de la Agencia, Jim Nee, que proporcionará una determinación y una propuesta de resolución sobre el asunto dentro de un período de dos semanas. El MWRTA Tránsito Administrador puede ser contactado en 508-935-2222.

Si te quedas satisfecho con la determinación y la resolución de su queja por el MWRTA, que se pongan en contacto con la Administración Federal de Tránsito en 617-494-2055 para la determinación posterior. Cuando se comunique con el TLC por favor, consulte el Título VI quejas.

MWRTA no tolera la discriminación por cualquiera de sus empleados o contratistas. Nuestro objetivo es trabajar con usted para asegurar que todas las personas reciban un trato justo en la prestación de los servicios de transporte de fondos federales.

Título VI da Política Reclamação

Se você sente que tem sido discriminado por MWRTA funcionários / contratados ou serviços prestados pela agência, entre em contato com o gestor MetroWest Título VI - Eva Willens em 508-935-2222. Ms. Willens vai pedir para você enviar a sua reclamação por escrito no formulário próprio. Por favor, inclua o máximo de informações possíveis, incluindo data, hora e local do incidente. Ms. Willens vai investigar a queixa e voltar para você em duas semanas.

Se a investigação e resolução de não satisfazê-lo, você tem o direito de apelar em contato com a agência de Administrador, Jim Nee, que irá proporcionar uma determinação e uma proposta de resolução sobre o assunto dentro de um período de duas semanas. O MWRTA Trânsito administrador pode ser contactado em 508-935-2222.

Se você ficar insatisfeito com a determinação e resolução de sua queixa pela MWRTA, que são incentivados a contactar a Administração Federal de Trânsito em 617-494-2055 para a nova determinação. Ao contatar o TLC consulte queixas Título VI.

MWRTA não tolera a discriminação por qualquer de seus empregados ou terceiros contratados. É nosso objetivo de trabalhar com você para garantir que todas as pessoas são tratadas de forma justa na prestação de serviços de trânsito financiados pelo governo federal.

Title VI Complaint Policy in Chinese Mandarin

第六编申述政策

如果您觉得MetroWest区域交通管理局（MWRTA）的员工/承包人歧视您，或者在本机构提供的服务中遭受歧视，请拨打508-935-2222联系MetroWest第六编项目官员Eva Willens。Eva Willens女士将要求您填写本文件提供的表格，以书面形式提交申述。请尽可能详尽地填写信息，包括提供事件发生的日期、时间和地点。Willens女士随后将会对申述展开调查并在两周内给予您答复。如果您对调查结果或解决方案不满意，您有权联系本机构主管 Jim Nee 进行上诉。Jim Nee 也将在两周内就该事件作出决定和给出拟定的解决方案。您可拨打508-935-2222联系MetroWest区域交通管理局（MWRTA）交通主管。如果您对MetroWest区域交通管理局（MWRTA）针对您申述作出的决定或提议的解决方法仍然不满意，我们鼓励您拨打617-494-2055联系联邦交通管理局（Federal Transit Administration），请求该机构作出进一步决定。在联系联邦交通管理局（FTA）时，请表明是针对第六编的申述。MetroWest区域交通管理局（MWRTA）绝不容忍任何员工或承包人的歧视行为。我们的目标是与您共同努力，确保所有人在享有联邦财政资助的交通服务时受到平等对待。

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In the past, consumers have requested documents considered vital in the Title VI Program. We currently have the vital documents available in Spanish, Portuguese, and Chinese Mandarin. If information is needed in another language, then please contact MWRTA at (508) 935-2222.

Spanish: Si necesita información en otro idioma, comuníquese con MWRTA al (508) 935-2222.

Portuguese: Se as informações forem necessárias em outro idioma, entre em contato com MWRTA em (508) 935-2222.

Russian: Если необходима информация на другом языке, свяжитесь с MWRTA по телефону (508) 935-2222.

Polish: Jeśli potrzebne są informacje w innym języku, prosimy o kontakt z MWRTA pod numerem (508) 935-2222.

Chinese Mandarin: 如果需要其他语言的信息，请致电（508）935-2222与MWRTA联系。

Rúguǒ xūyào qítā yǔyán de xìnxi, qǐng zhìdiàn (508)935-2222 yǔ MWRTA liánxi.

APPENDIX B
Title VI Complaint Form

Title VI of the 1964 Civil Rights Act states 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 subjected to discrimination under any program or activity receiving federal financial assistance.” If you feel that you have been discriminated against by the MetroWest Regional Transit Authority or any of its employees, please submit the following complaint form so that we may investigate the claim.

Send the completed form to:

Eva Willens
Metrowest Regional Transit Authority
15 Blandin Avenue
Framingham, MA 01702

eva@mwrt.com

Telephone: 1-508-935-2222

1. Name _____

Address _____

Phone _____ Email _____

2. Does your complaint concern:

_____ Discrimination in the delivery of services

_____ Discriminatory actions towards you or another individual

On what basis do you believe the discrimination took place?

_____ Race/Ethnicity _____
_____ Color _____
_____ National Origin _____

3. What is the best way to contact you regarding this claim?

4. On what date did the alleged discrimination occur?*

* We request that complaints be filed within 180 days of the incident.

5. Please provide a detailed account of the alleged discrimination, including who was involved, where it occurred, and why you believe it happened. Please attach additional pages if necessary.

6. List any witnesses and their contact information that we may contact for additional information.

7. How would you like this problem be resolved?

APPENDIX C

Title VI Investigations, Complaints, or Lawsuits Log

	Date (Month, Day, Year)	Summary Nature/Basis of Complaint (Include Race, Color, or National Origin)	Status	Action(s) Taken
Investigations	None.			
1.				
2.				
3.				
Complaints	None.			
1.				
2.				
3.				
Lawsuits				
1. Whitfield v. MWRTA	Filed August 5, 2022	Customer claims she was denied service due to her status in a number of protected categories.	Case is being investigated by Massachusetts Commission Against Discrimination	MWRTA responded to the lawsuit on November 10, 2022. MWRTA maintains the customer was not discriminated against. See attached letter for further details.
2.				
3.				

GORDON LAW GROUP, LLP
COUNSELORS AT LAW

585 Boylston Street
Boston, MA 02116
Ph: 617-536-1800
Fax: 617-536-1802

Benjamin Flam, Esq.
bflam@gordonllp.com

December 5, 2022

Region One
Federal Transit Administration

RE: MetroWest Transit Authority – Title VI Report

Dear Sir or Madam:

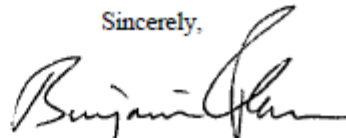
I serve as employment counsel to the MetroWest Transit Authority (MWRTA). In accordance with 49 CFR Section 21.9(b), and in connection with MWRTA's Title VI Program submission for 2022, I write to convey the list of investigations, complaints and lawsuits that allege discrimination on the basis of race, color or national origin.

On August 5, 2022, a charge of discrimination was filed by Ms. Jessica Whitfield before the Massachusetts Commission Against Discrimination (MCAD), alleging discrimination on the basis of race, color and national origin, among other protected classes. Ms. Whitfield claims she was denied service because of her status in a number of protected categories.

Ms. Whitfield was not the victim of any discrimination. Indisputable video evidence demonstrates Ms. Whitfield's misconduct. In sum, Ms. Whitfield refused to follow MWRTA's rules, including debussing at the end of the route, disrupting other passengers' experiences, and exhibiting violence towards MWRTA staff. The police departments for both the Town of Natick (Massachusetts) and the City of Framingham (Massachusetts) responded on multiple occasions to assist MWRTA staff in dealing with Ms. Whitfield and the events giving rise to her complaint.

MWRTA filed its position statement in response to the charge with MCAD on November 10, 2022, and Ms. Whitfield did not file any rebuttal within the 21-day period allotted by MCAD regulations. The case is currently with the MCAD investigator awaiting disposition. We believe the case will be dismissed by MCAD for Lack of Probable Cause.

Sincerely,



Benjamin Flam

APPENDIX C (Continued)

Title VI Board / Committee Member Ethnicity Form

MetroWest Regional Transit Authority (MWRTA)

TITLE VI Program 2022

Advisory Board Member Ethnicity

	Black American	Hispanic American	Native American	Subcontinental Asian American	Asian Pacific American	Non-minority
Ashland						X
Disabled Community Member						TBD
Dover						X
Framingham						X
Holliston						X
Hopedale						X
Hopkinton						X
Hudson						X
Marlborough						X
Milford						X
Natick						X
Sherborn						X
Southborough						X
Sudbury						X
Wayland						X
Wellesley						X
Weston						X


 Linda Murtagh / Signature

APPENDIX D - MWRTA LEP CARD

MetroWest Regional Transit Authority Limited English Proficiency Card

2004 Census Test	United States Census 2010	LANGUAGE IDENTIFICATION FLASHCARD
<input type="checkbox"/>		ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.
<input type="checkbox"/>		Խոսողո՞ւմ ե՞նք 'նշո՞ւմ' կատարե՞ք այս քառակուսում, եթե խոսո՞ւմ կա՞մ' կարդո՞ւմ ե՞ք հայերեն:
<input type="checkbox"/>		যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।
<input type="checkbox"/>		ឈូមបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។
<input type="checkbox"/>		Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.
<input type="checkbox"/>		如果你能读中文或讲中文，请选择此框。
<input type="checkbox"/>		如果你能讀中文或講中文，請選擇此框。
<input type="checkbox"/>		Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.
<input type="checkbox"/>		Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.
<input type="checkbox"/>		Kruis dit vakje aan als u Nederlands kunt lezen of spreken.
<input type="checkbox"/>		Mark this box if you read or speak English.
<input type="checkbox"/>		اگر خواندن و نوشتن فارسي بلد هستيد، اين مربع را علامت بنزيد.
<input type="checkbox"/>		Cocher ici si vous lisez ou parlez le français.
<input type="checkbox"/>		Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.
<input type="checkbox"/>		Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.
<input type="checkbox"/>		Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.
<input type="checkbox"/>		अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।
<input type="checkbox"/>		Kos lub voj no yog koj paub twm thiab hais lus Hmoob.
<input type="checkbox"/>		Jelölje meg ezt a kockát, ha megérti vagy beszél a magyar nyelvet.

1. Arabic

2. Armenian

3. Bengali

4. Cambodian

5. Chamorro

6. Simplified Chinese

7. Traditional Chinese

8. Croatian

9. Czech

10. Dutch

11. English

12. Farsi

13. French

14. German

15. Greek

16. Haitian Creole

17. Hindi

18. Hmong

19. Hungarian

APPENDIX D - MWRTA LEP CARD (Continued)

MetroWest Regional Transit Authority Limited English Proficiency Card

<input type="checkbox"/>	Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
<input type="checkbox"/>	Marchi questa casella se legge o parla italiano.	21. Italian
<input type="checkbox"/>	日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
<input type="checkbox"/>	한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
<input type="checkbox"/>	ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ.	24. Laotian
<input type="checkbox"/>	Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish
<input type="checkbox"/>	Assinale este quadrado se você lê ou fala português.	26. Portuguese
<input type="checkbox"/>	Însemnați această căsuță dacă citiți sau vorbiți românește.	27. Romanian
<input type="checkbox"/>	Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
<input type="checkbox"/>	Обележите овај квадратик уколико читате или говорите српски језик.	29. Serbian
<input type="checkbox"/>	Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
<input type="checkbox"/>	Marque esta casilla si lee o habla español.	31. Spanish
<input type="checkbox"/>	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
<input type="checkbox"/>	ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย.	33. Thai
<input type="checkbox"/>	Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
<input type="checkbox"/>	Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.	35. Ukranian
<input type="checkbox"/>	اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	36. Urdu
<input type="checkbox"/>	Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
<input type="checkbox"/>	באצייןכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish

APPENDIX E

Vital Documents for Safe Harbor Limited English Proficiency (LEP) Compliance

MWRTA has determined the following documents are Vital Documents for people with Limited English Proficiency (LEP):

Notification of Rights

Complaint Policy

Complaint Form

ADA Application for Determination Parts A and B

ADA Ride Guide

Updated versions of each document in Safe Harbor Languages are available in Spanish, Portuguese, and Chinese Mandarin.

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In the past, consumers have requested documents considered vital in the Title VI Program. We currently have the vital documents available in Spanish, Portuguese, and Chinese Mandarin. If information is needed in another language, then please contact MWRTA at (508) 935-2222.

Spanish: Si necesita información en otro idioma, comuníquese con MWRTA al (508) 935-2222.

Portuguese: Se as informações forem necessárias em outro idioma, entre em contato com MWRTA em (508) 935-2222.

Russian: Если необходима информация на другом языке, свяжитесь с MWRTA по телефону (508) 935-2222.

Polish: Jeśli potrzebne są informacje w innym języku, prosimy o kontakt z MWRTA pod numerem (508) 935-2222.

Chinese Mandarin: 如果需要其他语言的信息，请致电（508）935-2222与MWRTA联系。
Rúguǒ xūyào qítā yǔyán de xìnxi, qǐng zhìdiàn (508)935-2222 yǔ MWRTA liánxi.

APPENDIX F

EQUITY ANALYSIS FOR BLANDIN AVENUE FACILITY

Metrowest Regional Transit Authority

BLANDIN AVENUE FACILITY TITLE VI

FIXED FACILITY ANALYSIS

November 25, 2013



Title VI Analysis

FIXED FACILITY ANALYSIS FOR MWRTA BLANDIN AVENUE FACILITY

Statutory Basis - CFR 4702.1 Chapter 3, Section 2f

On October 1, 2012 the Federal Transit Administration (FTA) published "Title VI Requirements for Federal Transit Administration Recipients." This circular provided guidance and instructions for carrying out United States Department of Transportation (USDOT) regulations by integrating policy directives to include responsibilities regarding to the needs of persons with limited English proficiency with previous Title VI requirements. The purpose of the circular was to ensure that the level and quality of public transportation service is provided without discrimination and that the transit authority promotes full and fair participation in public transportation decision making without regard to race, color, or national origin. Furthermore, Title VI ensures meaningful access to transit related programs and activities by persons with limited English proficiency.

The statutory authority is based on Title VI of the Civil Rights Act of 1964 which states:

No person in the United States shall on the basis of race, color or national origin be excluded from participation in, be denied benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

The accompanying regulatory authority is found in both the USDOT and the United States Department of Justice (USDOJ). From a programmatic perspective, the FTA has adopted a Title VI reporting process which requires funding recipients to establish a process that complies with applicable statutes and regulations, maintaining appropriate records with respect to the Title VI program and documenting compliance through the submission of a Title VI program to their FTA regional civil rights officer every three years.

TRANSIT EQUITY ANALYSIS

To assist recipients in compliance, the FTA has provided additional guidance to determine whether potential actions would have a disparate effect on persons because of their race, color or national origin. There are three general areas that require equity impact analysis: fare changes, service changes and facility location decisions.

The MWRTA has adopted a Title VI Plan which includes policies that require that the agency comply with federal regulations regarding Title VI compliance. To comply with those policies and to ensure that the development of the agency's Blandin Avenue facility does not provide disparate adverse effects to Title VI protected classes of individuals, MWRTA has conducted an Equity Analysis. As required by Title VI for construction projects, a fixed facility impact analysis is necessary to assess the effects on minority communities. The fixed facility analysis shall be comprised of the following information:

- Project history and background for each of construction project or service plan

- Potential impacts on minority communities and minority owned businesses during and after construction
- Potential negative environmental impacts such as noise air and water pollution
- Minority owned businesses and households affected by the construction project
- Significant impacts on minority communities such as: increased traffic, reduction in available parking
- Relocation program and or other measures adopted by the applicant used to mitigate identified adverse social, economic or environmental effects

The Metrowest Regional Transit Authority (MWRTA) in compliance with federal regulations is submitting this review of the relocation of its facility at 37 Waverley Street in Framingham, Massachusetts to 15 Blandin Avenue in Framingham, Massachusetts. While only 0.7 miles apart, the new facility will provide improved access to downtown Framingham, the regional center of the Metrowest while simultaneously allowing the agency to provide better intermodal connections to other areas of the service district. Simultaneously, the new facility will allow the MWRTA to exercise better oversight of agency assets. It should be noted that MWRTA is not building a new facility but rather rehabilitating an existing building in an industrial zone. In doing so, MWRTA will use green techniques including energy efficient materials and environmentally proven technologies. The rehabilitated facility will reduce blight in the area by provided landscaping in an area with very little existing green space. Another aspect of the project will be the installation of CNG fueling capacities to improve air quality and provide an important link on the statewide alternative fuels network which will improve air quality for the region. This component will allow agencies to choose alternatively fueled vehicles providing an opportunity to improve air quality.

MWRTA Title VI Process

MWRTA's current Title VI is dated October 1, 2013 and covers the period of October 1, 2013 through September 30, 2016. This document includes specific information regarding MWRTA's complaint procedures, investigative process regarding complaints and lawsuits, access of services to people with limited English proficiency as determined by a four factor analysis, outreach processes for notification of beneficiaries of their rights, public participation protocols, demographic information, service policies and policies to evaluate service and fare changes. MWRTA is committed to comply with Title VI responsibilities.

MWRTA works with local neighborhood partners to reach out to the community to find out what their needs are, and we work diligently to address those needs. MWRTA has a robust community outreach program with regular consultation with community groups and the public. The following pictures were taken at a community outreach event in the neighborhood between the current facility and the new facility. MWRTA has found holding events in the community brings out people who otherwise may not attend public meetings. At this event, we had an informational table where we passed out schedules and answered questions. We also brought a bus to the event to let people check it out for themselves. MWRTA and operational staff including bi-lingual staff were present to answer questions. To build attendance for the event we provided drinks and refreshments and raffled off small prizes such as \$5 bus passes.



Service Area Demographic Overview

MWRTA's new facility is proposed to be located in Framingham, MA- the largest community in our service area. Framingham is the primarily economic center of the Metrowest region and also is the location of the regions social service agencies as well. MWRTA has more riders on its Framingham routes than any other community and the majority of our routes provide connections at the agency's hub. Proximity to our customers, the downtown and the MBTA commuter rail station were key factors in selecting the new site.

The following table includes a breakdown of racial background of the MWRTA's member communities. Diversity in the communities ranges from a low of 2% minority in Dover to a high of 28% minority in Framingham. Transit levels in these communities also vary with no transit service being operated in Dover and the agencies most service being operated in Framingham. Because we see this transit facility as a positive addition to the community, bringing access to transit and minimizing inconvenience to our passengers as well as the including community facilities, we believe that the siting of this facility is not discriminatory but rather supportive of the minority community and our passenger base.

Community	Total	White	Black	American Indian	Asian	Native Hawaiian	Some Other Race	2 or more	Hispanic
Ashland	16,593	13,978	391	23	1,452	3	437	309	740
Dover	5,589	5,320	23	2	203	1	8	37	67
Framingham	68,318	49,121	3,962	205	4,304	68	-	3,143	9,155
Holliston	13,801	12,825	118	13	337	2	105	147	246
Hopkinton	14,925	13,902	123	11	655	-	55	179	267
Marlborough	38,499	31,147	1,061	91	1,933	25	2,960	1,282	4,174
Natick	33,006	28,822	692	42	2,386	10	391	663	994
Shrewsbury	35,608	28,187	752	33	5,451	5	539	641	961
Southborough	9,767	9,590	89	16	815	1	64	177	272
Sudbury	17,659	16,036	149	9	1,041	9	99	316	350
Wayland	12,994	11,528	148	27	1,431	13	67	208	315
Wellesley	27,982	23,817	571	36	2,756	7	197	598	1,020
Weston	11,261	9,611	230	8	1,114	-	70	228	294
TOTAL	306,002	253,884	8,309	516	23,878	144	4,992	7,928	18,855

**MWRTA Service Area 3
Minority Population by Census**

Legend:

- Population Density:
 - 1,000+ (Dark Blue)
 - 500-999 (Medium Blue)
 - 250-499 (Light Blue)
 - 100-249 (Very Light Blue)
 - 0-99 (White)
- Transportation:
 - Highways (Thick Blue Lines)
 - Roads (Thin Blue Lines)
 - Railroad Tracks (Dashed Black Lines)

Scale: 0 to 1.0 Miles

North Arrow

Map by MAPC 501K

For more information, visit: www.mwrtarail.com

Project History and Background

MWRTA began operations in 2007. Initially the agency operated out of a former used car dealership in Framingham. MWRTA rented the facility and but wanted to purchase it to drive down the agency's operating expenses. The owner of the property, however, did not want to sell the facility so MWRTA purchased a different facility in close proximity and relocated operations. The new facility was a former Miencke muffler shop that MWRTA transformed into administrative and operating offices for MWRTA fixed route fleet. MWRTA has expanded operations significantly since that move, increasing from an initial ridership of 319,627 in FY08 to an estimated 600,000 in FY14. This has resulted in an increase in fixed route fleet and agency staff such that the agency can no longer be accommodated at its current location.

At the same time, initially the agency's paratransit services were operated by a private carrier at a different location. MWRTA has found that in contracting for paratransit services, competition has been limited due to the need to provide a garaging site for the agency's paratransit fleet. MWRTA believes that if the vehicle garaging component were removed from the contract, competition would thrive and the agency would reduce operating costs. In addition to increasing competition, the agency would also be able to perform additional maintenance tasks thereby saving additional funds.

MWRTA also felt that moving closer to downtown Framingham would better serve the riding public by strengthening the ties to the downtown and providing intermodal opportunities with the MBTA's commuter rail system.

To determine the location for the new operating center, MWRTA identified a number of facilities in the operational vicinity. One strong consideration was that the agency wanted to remain in the neighborhood to ensure that we would continue to serve our customers in the area who have come to rely on us for their transportation needs. Factors examined included proximity to existing customers and downtown Framingham, intermodal connections, size of facility, neighborhood impact and others. There will be no displacement of businesses or residents due to implementation of this project.

Although only .7 miles from the MWRTA's current administrative facility, the Blandin Avenue facility provides opportunities for intermodal efficiencies which are not possible in the current MWRTA space at 37 Waverly Street in Framingham. The facility was formerly used as a depot for NStar utility trucks and maintenance activities and most recently was used by the south Middlesex Opportunity Council as a storage facility for donated materials. The neighborhood is a mix of industrial and residential uses and MWRTA believes that the use of this facility for public transit bridges these uses well.

In September of 2012, MWRTA began leasing the facility with the intent of developing the location into an administrative and maintenance facility and regional intermodal hub. MWRTA's current facility is too small to accommodate the existing fixed route and paratransit fleet. The new facility is significantly larger in scale and will allow the agency to develop a true intermodal center which will bring together a variety of modes in close proximity to downtown Framingham and the MBTA Framingham commuter rail stop.

The new intermodal center will include expanded bike facilities and will provide closer pedestrian access to downtown Framingham and the MBTA commuter rail station. The Blandin Avenue facility will be pedestrian friendly and accessible to the neighborhood whereas the current facility does not have sidewalks to the east of the facility restricting pedestrian access or forcing passengers to walk in the street along a very busy state highway (Route 135).

The Blandin Avenue facility will have enhanced transfer opportunities for fixed route and paratransit services which can simultaneously improve efficiency of the system while enhancing the customer experience. By more closely integrating the routes, transfers can be made seamlessly. In addition, the new facility will allow MWRTA to provide a better customer experience with seating, shelters, ITS enhancements and other amenities.

An important aspect of the project is MWRTA's intent to begin switching to CNG fuel in an effort to reduce emissions and drive down operating costs. The existing MWRTA facility does not have space for such a facility and would require MWRTA vehicles to deviate off route for re-fueling. The new facility could accommodate the fueling station which would provide easily and cost effective fueling during the routes scheduled breaks. The facility will also serve regional CNG fueling needs in a secure environment. These features are expected to reduce harmful emissions in the neighborhood.

The Blandin Avenue location is sited on a 4.64 acre parcel with a 19,175 square foot, two-story building. The neighborhood surrounding the facility is an environmental justice neighborhood with lower incomes and a racially diverse demographic profile. Access to transportation will provide increased access to opportunities for residents to get to work, education, health care and social activities. The facility will also contain a community room and training center which can be used by agencies and community groups.

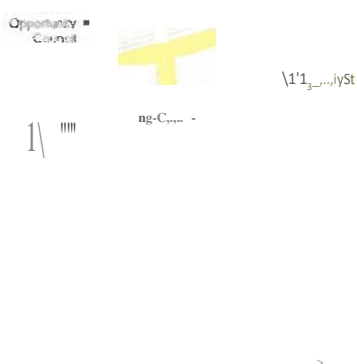
Vehicle access to the facility will be primarily along Marble Street, which provides direct access to State Highway Route 135. Marble Street is currently bordered commercial by and industrial uses. There are no residential uses on the street. MWRTA is a small suburban transit authority with typical 60 minute headways. Traffic impacts on the roadways due to the buses will be negligible, however as the agency grows we anticipate taking cars off the street.

MWRTA has already identified significant resources for the build-out of the project. MassDOT has previously awarded the project \$75,000 in RTA capital assistance program funds for engineering and design costs and the agency was awarded a competitive national grant for \$1,024,000 through the Veterans Transportation and Community Livability Initiative (VTCLI) program in August 2012. The VTCLI funds will be used to create a "mobility management" call center which would provide a clearinghouse of transportation options for public, private and nonprofit transportation providers further increasing our interoperability and efficiency. The purpose of the call center will be to educate the consumer on each of the transportation options available to them so that they can make an informed decision based on cost, eligibility and convenience.

The property has been environmentally vetted and is at 15% completed design and engineering. MassDOT has already paid for 100% of the cost of removing asbestos from the site.

Benefits of the Complete Blandin Avenue Project

- Allows intermodal access to the region's transportation services including MBTA commuter rail.
- Provides coordinated transfer site with enhanced customer amenities between agency fixed route services.
- Provides safer bicycle and pedestrian access than the present facility which does not have a complete sidewalk network.
- Creates an opportunity for enhanced bicycle infrastructure, such as secure bicycle parking - furthering the reach of public transit services.
- Links downtown Framingham with direct access to other Metrowest towns.
- Offers an opportunity for private carrier regional bus lines to serve the area (presently in discussion).
- Provides continuing Control of assets by bringing maintenance and storage of the vehicles under direct oversight of the transit authority
- Reduces annual operating costs by at least \$100,000 by bringing all agency functions under one facility.
- Builds on existing \$8M investment at Routes 126 and 135 in downtown Framingham
- Creates a regional CNG fueling facility driving down harmful emissions and supporting MassDOT environmental goals.
- Supports the Massachusetts Bay Community College \$22M relocation to downtown Framingham
- Provides safe and affordable transportation access to a diverse environmental justice neighborhood



Based on these factors, the facility at 15 Blandin Avenue was determined to be the best location for the agency.

ANALYSIS FACTORS

Potential impacts on minority communities and minority owned businesses during and after construction

MWRTA believes that the creation of the new Blandin Avenue facility will result in business opportunities for the community including minority owned businesses. The location of both the current and future facilities is in the same low income, minority and limited English proficiency neighborhood. The two facilities are .7 miles apart. Many of the locally owned businesses are restaurants featuring Brazilian or Latin American food, auto shops and other small businesses. There are also a number of chain stores such as fast food restaurants along the Route 135 corridor. MWRTA, its employees and customers currently purchase goods and services from neighborhood businesses including gas stations, car repair shops, restaurants and other businesses. In fact many of MWRTA's employees are area residents who live within a short distance of the facility.

The new facility will allow the agency to continue to expand, bringing economic opportunity and vitality to the neighborhood. With the consolidation of paratransit services and the growth of the mobility management functions additional jobs will be created. MWRTA and our vendors advertise job openings locally including with yard signs so that people in the neighborhood are aware of potential economic opportunities in the neighborhood.

The new facility will also include a community room that can be used by organizations for educational programs. This will be a community resource that is currently lacking in the area.

The new facility is a rehab of the existing structure so there will be no major external construction over the course of the project. Work will be limited to the hours of 7 am to 7 pm to minimize any intrusion to the neighborhood.

Potential negative environmental impacts such as noise air and water pollution

The proposed site is located in a mixed neighborhood of industrial properties and housing. The development of the Blandin Avenue facility will improve the quality of the local environment by reclaiming an underutilized building in the heart of a neighborhood of industrial properties. The new facility will result in improved access to and from the community allowing residents to expand their opportunities for educational, vocational and social outlets. Similarly, the location will allow people throughout the Metrowest region to access businesses and opportunities in the vicinity of the new facility including the ability to walk to classes at the MassBay Community college classrooms which are being located to downtown Framingham. It is MWRTA's belief that the new facility will animate the area increasing pedestrian traffic and social interaction.

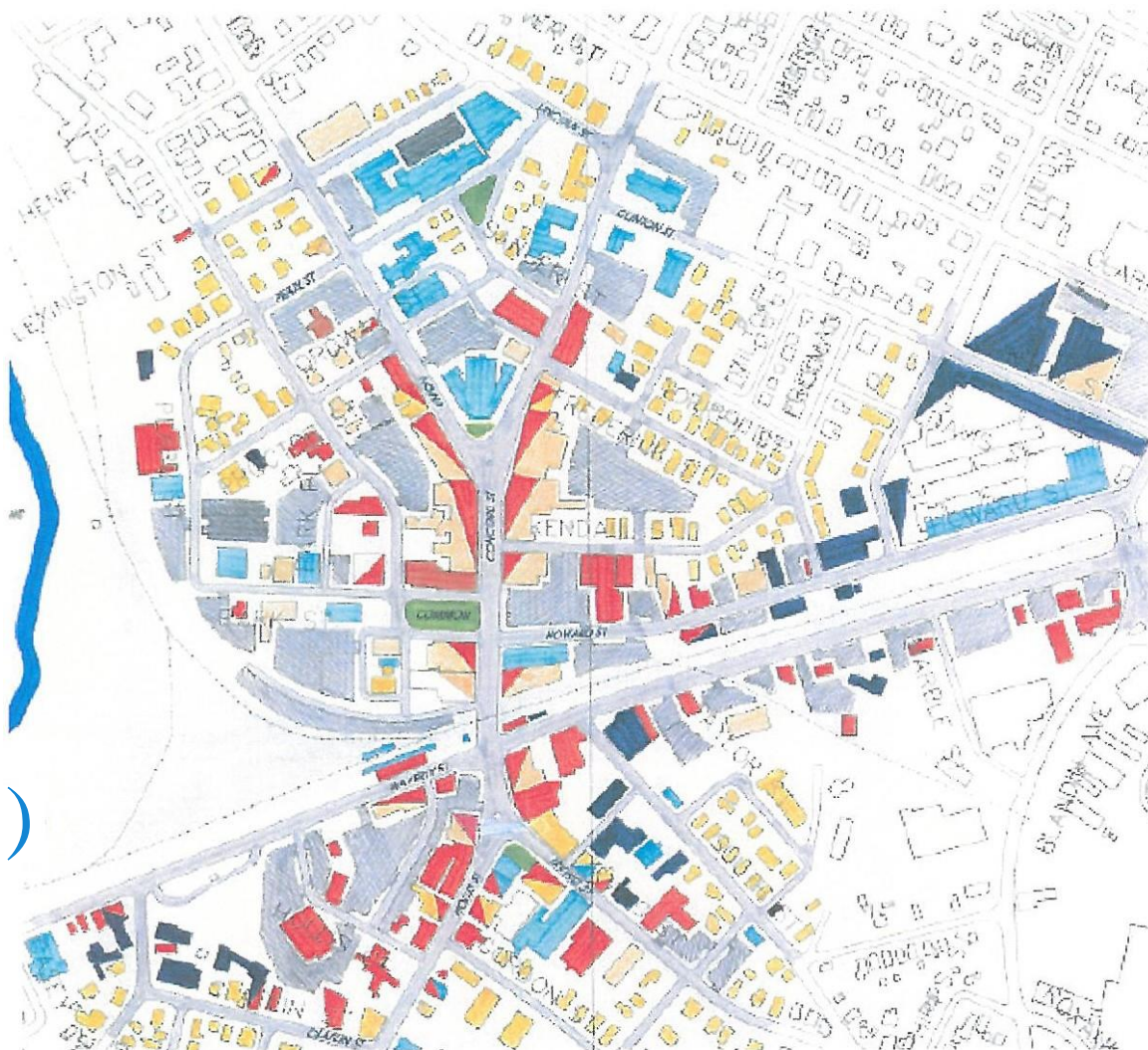
Negative environmental impacts are not expected as the agency plans on using environmental best practices for water reclamation and energy use. The agency will improve the area's green space by adding landscaping and plantings around the area similar to improvements made at their previous facility at 37 Waverly Street in Framingham. As part of the overall project, MWRTA is also implementing

a CNG fueling station which is expected to improve air quality by changing emissions from potential system users and adding an important node on the regional fueling network. The MWRTA does not expect to contribute to noise impacts as our vehicles are small mini-buses that are significantly smaller than those used by other businesses in the area.

Minority owned businesses and households affected by the construction project

MWRTA has included a map from the Downtown Framingham Economic Development Strategic plan that outlines parcel by parcel land use in the vicinity of the ITC. The area directly around and including the facility is primarily industrial {grey}. There is a cluster of residential {yellow} to the west.

Commercial buildings are shown in red and institutional uses are shown in light blue. Dark grey buildings are industrial uses. The Blandin area site is the large building to the west of Marble Street. Traffic flows are designed to use Marble Street and SR 135 to access the facility. MWRTA is also including a map of environmental justice areas which when overlaid with the land use shows that the area of the former and future facility locations are both ethnically diverse and low income.



MWRTA does not anticipate significant impacts on minority communities because of the relocation of the MWRTA facility. There will be no changes in the number of on street parking spaces and MWRTA will have available parking at no charge for people who want to park and ride on our buses. MWRTA currently runs 11 bus routes; however, not all of them serve the ITC on every trip. MWRTA has routed the buses to access Route 135 with minimal congestion, as the vehicles currently use the same stretch of Route 135, there will be no additional traffic due of the relocation.

Relocation program and or other measures adopted by the applicant used to mitigate identified adverse social, economic or environmental effects

MWRTA does not anticipate negative impacts due to the relocation of the existing facility at 37 Waverley Street to 15 Blandin Avenue. The agency will be introducing best environmental practices in developing the facility so that MWRTA can reduce its environmental footprint. Including in that is the development of CNG fueling capabilities which will alleviate air borne pollutants in the region. As FTA is aware, a strong transit system is a great way to improve the region's environment. MWRTA is partnering with other entities in the region to share the CNG fueling station as an important node on the State's alternative fuel network to spread the benefits of emissions reduction.

The MWRTA strongly believes that the new facility will benefit the community socially and economically as better connections will allow for passengers to travel throughout the MWRTA system and beyond for purposes determined by the individual. As a young agency, the MWRTA is still in the process of making itself known to the community. We have developed a strong outreach program which allows us to go into the community- participating in the events that are important to our potential customers such as health fairs, farmers markets and community events. These opportunities allow area residents opportunities to think about the services offered, ask questions of MWRTA and provide feedback and suggestions. A recent outreach event held in the neighborhood of the new ITC included bringing a bus to the neighborhood and providing pizza, raffles and children's activities. Residents of the housing development were told about the places they could go on the bus and schedules and system maps were distributed. Residents advised MWRTA officials that an increase in service was desired.

Conclusion

MWRTA has completed an analysis of the impacts of the relocation of the agency's current transportation hub from 37 Waverley Street to 15 Blandin Avenue in Framingham. A review of the demographic data and information for the community in close proximity of the facility reveals that the facility will continue to serve the diverse neighborhood in which the facility is located. MWRTA would like to leverage the Blandin Avenue site to provide enhanced access to the adjacent neighborhood.