



Martha's Vineyard Commission

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Title VI – 2019 – Draft
Martha's Vineyard Joint Transportation Committee (JTC)
Prepared by Martha's Vineyard Commission Staff – revised May 2019

- I. Language Access: *Please identify the financial cost and resources that were expended in the past year to provide language and/or disability related accommodations (translation services, interpreters, alternate document format production, etc.). Resources include staff time, direct expenses, etc.*

The Martha's Vineyard JTC has not had any requests for language services and or disability accommodations in several years. The JTC maintains a database of potential translators, videographers and other accommodators. We have necessary budgetary resources should those services be required.

Future action JTC staff will develop a section on language and other forms of accommodation and develop a series of instructions to utilize those services. They will be incorporated in the MVC website. JTC staff is also working on versions in Portuguese and in Tribal language for general distribution on island. Services available will include:

- The Title VI Notice to Beneficiaries
 - Meeting/Hearing Notice Template
 - Title VI Complaint Forms
 - Title VI Complaint Procedures
 - Single-line "riders" for flyers
- II. Equity Analyses: *Reflect on the quality and accuracy of the equity analyses performed on the FFY2018 UPWP and FFY2018-2022 TIP to determine if regional needs are effectively captured or if there are areas for improvement.*
- a. *Are there regional/community equity concerns that you know of that are not effectively reflected in the current analytical approach?*
 - i. *Ex: particular demographic clusters not present in the data; contextual or anecdotal information about community needs that are not easily identified through demographic data.*
 - b. *Can you suggest equity analysis methodology improvements to capture or document those equity considerations more effectively?*

Martha's Vineyard is a small island where communities and clusters blend together. There is a section of Tribal housing that might be identified as a particular demographic cluster, but other than that there are no neighborhoods or communities that exhibit specific tendencies except for the tribal housing development in Aquinnah. Project planning centers around the fact that most island locations operate differently on a seasonal or non-seasonal basis, elderly residents need services, and short-term employees require transportation as they frequently do not have vehicles. Planning also centers on alternative transportation methods and facilities that could be used by all. It is our view that we have made progress in each area given our financial parameters, although more needs to be done.

Transportation improvement funds normally have a regional focus. Evaluating projects' benefits and burdens are evaluated on their regional benefit to the island. For example, regional bike paths and funding additional bicycle and pedestrian pathways are programmed over the next 4 years with State/Federal funding.

We also are heavily integrated into the Martha's Vineyard Transit Authority and provide support to their funding and other programs.

Equity concerns then are macro in scale and construction projects are programmed for that, while program funding mainly concerns the ability to operate and finance a sole mass transit option that is constantly funding challenged. Smaller alternative systems for mass transit are being developed, but again, our scale is challenging. One group of specific concerns is the transportation needs for seniors. These needs are well established through user comment and surveys. Facilities to meet their needs are being addressed and might be included in future TIP or UPWP. They include on and off island transportation to medical facilities. The provision of these facilities is challenged due to the lack of regular funding.

We are in the process of developing permanent roadway counters to record traffic on a permanent regular systematic basis so that we might better view trends in both seasonal and non-seasonal conditions. We also will be in a better position to evaluate micro conditions given that our macro viewpoints are taken care of. Finally, we will work more closely with the Tribe to ensure their specific needs are identified.

We find that one statewide equity measure methodology statewide might not be sufficient. These measures described in this Title VI memo are important, but the approaches used here are developed for larger areas and really don't consider our needs and programs. We would suggest that equity performance measures for rural areas might be developed separately from MPO's that service larger populations or geographic areas. We have participated in the rural policy planning committee and other groups to evaluate differing measures for limited population areas. We look to collaborate with the MassDOT further in these matters

- III. Equity Impacts on MPO Activities: *Have equity considerations impacted a project score, work task, or programming decision in your region in the FFY2017-2021 and FFY2018-2022 TIPs and UPWPs?*
- a. *Based on these observations, are there recommendations for improvement as to how equity and context specific considerations are incorporated into these decisions?*
 - b. *How are community needs and priorities incorporated into or reflected within these decisions?*

We are a small island, so a precise evaluation of equity populations using geography is difficult to produce, and mostly not of benefit. We do score projects, but equity considerations have not come into play recently. Our funding is limited and we basically program transportation funding for maximum island-wide benefit. There are no easy ways to quantify this, such as determining that a certain location is more deserving. We have designed specialized programs to address specific needs. Again we are challenged to provide regular funding for these programs.

We program funds to mass transit in general, as this is a vital program to island residents of all levels and circumstances. We pay attention specifically to funding that program. We also have focused on alternative transportation projects such as programmed bicycle and pedestrian projects, which provide different kind of benefit to the various population groups. Projects benefit range from offering safe exercise opportunities to providing travel routes to employment. Again we evaluate general benefit and it is difficult to address equity considerations in a locational manner.

We also are aware that new facilities or projects might not address issues. For example, tribal housing is serviced adequately by VTA routing but there are times when routes do not run in those areas (late night). It is fiscally challenging to provide routing that lose money. We are fortunate that the VTA operates 7 days per week given their small size and limited ability to attract drivers.

We integrate with the public and others on numerous occasions. Given the number and mission of the numerous non-profits, project planning normally requires evaluation of workforce and other groups. The MVC has commissioned and participated in several planning studies that evaluate need based on income, especially in the senior sector. The MCV recently completed an elderly mapping study that identified services that were needed but not required. One such as individual ride sharing for seniors for regular errands and on-island medical attention. We are in the process of developing grants for these services.

- IV. Public Engagement: *Has the MPO's participation with partner organizations (such as involvement with a local task force or community event) better connected Title VI and equity principles with the MPO's transportation related activities? Have community relations led to new and/or diversified constituent involvement?*

We work with different social service organizations regularly and frequently.

We have partnered with various organizations that offer social services to ensure that island residents' needs are met. We partner frequently with the VTA, as they offer the only form of mass transit on the island. We also have partnered with social service groups such as the Martha's Vineyard Community Services and the Island Healthy Aging Task Force to offer specific services, such as medical appointment transportation and other programs to assist elderly and disadvantaged clients. We are currently working with the Community Pedestrian and Bicycle Committee to develop plans and projects.

Last year we developed a grant that funded a project to provide transportation services to elders as they travelled to the Cape for medical treatment.

The Vineyard is a small community with an increasing aging population. We are fully integrated in many programs that offer services to those residents. Many of these residents are also low income, as they rely on social security as their main means of financial support. Offering transportation services to this group is critical but difficult given our limited levels of funding. We are developing grants and other methods of funding but given the current State and federal funding for these services, it is difficult to project immediate success,

a. What factors do you think led to the success of these engagements and relationships? What factors do you see as contributing to barriers to success? How does the MPO plan to continue building upon established successes and encountered challenges?

The key factor to our success is the genuine development of long-term partnerships characterized by real participation. The VTA is a member of the JTC and we work regularly with them. For example, we participated in the grant award for funding that resulted in the deployment of electric buses. These efforts are led by the VTA but are consistently discussed and supported by the JTC and the MVC, as well as the Towns.

We also regularly partner with MV Community Services and other non-profits that provide programming for at-risk segments of the population. We are on the boards of several social agencies and attend meetings, perform studies, and develop statistics that influence their missions and transportation solutions. We include our statistical abstract developed this year. We are developing programs that respond to identified island need.

V. Public Engagement: *What efforts did the MPO engage in to meet and forge relationships with constituencies that previously were not effectively being reached? We're planning. The MPO constantly participates in and develops materials presented in forums besides MPO, Joint Transportation Committee, or public hearing type meetings.*

We recently reinstated our bicycle and pedestrian committee. We are also part of several groups that meet and regularly discuss transportation for disadvantaged residents of all types. Last fiscal year we worked to develop a program for transit of seniors to Cape Cod medical appointments using federal grant funding we secured. Unfortunately the funding was not multi-year and we are searching for replacement.

VI. Training: *Did staff or leadership participate in any Title VI and/or equity related trainings?*

We did not participate in any training. Staff members are well trained in taking public testimony and acting or referring such public testimony to the proper party.

VII. Complaints:

a. Complaint Forms - MassDOT has updated and translated a discrimination complaint form. The form is approved by FHWA and FTA is available for MPO use (download from SharePoint at <https://services.eot.state.ma.us/cr>). Please review these materials and document their incorporation into MPO protocols. Document the dissemination of the complaint forms. If the MPO chooses to continue using a different complaint form, please provide an updated copy for MassDOT review and approval.

We have reviewed the complaint form and have disseminated and utilize this for different languages and mission. We will place it on our website. We have not had any complaints during the last three years.

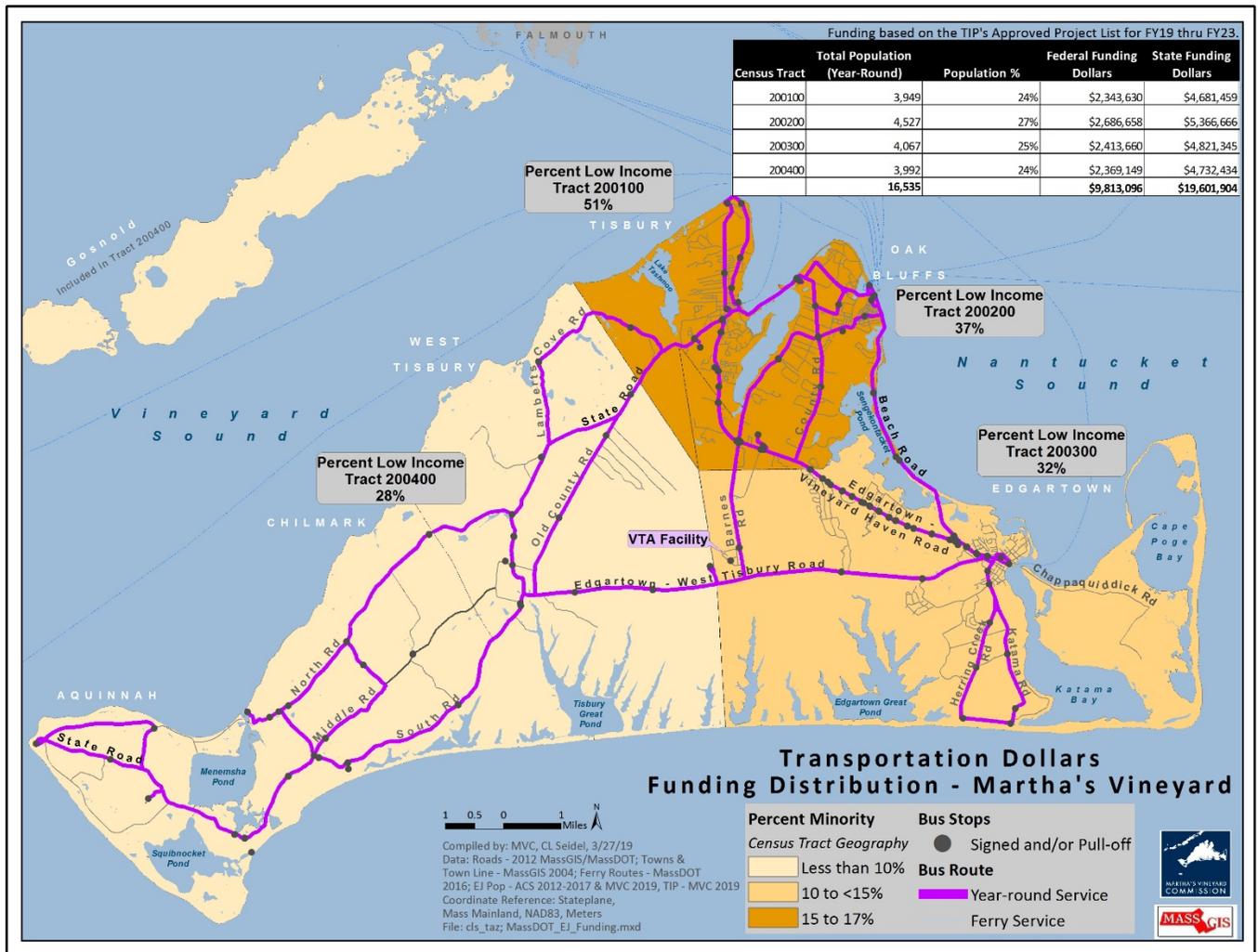
We frequently release plans and documents for public comment. If contacted regarding an action, staff is trained to listen and understand the public comment, document it, and either act themselves or refer it to the appropriate party.

One advantage we possess as our staffing level is small, personnel in different disciplines are well versed on activities undertaken by the MPO.

- b. Complaint Procedures - MassDOT has updated and translated (into the top ten languages in the Commonwealth) the Title VI Complaint Procedures document. These procedures are designed to instruct recipients and subrecipients of federal transportation dollars on how to process allegations of discrimination made by members of the public. The revisions reflect recent guidance from FHWA regarding delegation of authority to recipients and subrecipients to conduct Title VI investigations. In addition, in creating these updated procedures, MassDOT's Title VI staff worked closely with the agency's Manager of Investigations in order to simplify the content for ease of understanding among members of the public. These revised complaint procedures are in use by MassDOT and as such have been reviewed and approved by FHWA and FTA. In addition, they have been professionally translated. Please download the documents from the MassDOT Title VI SharePoint page (<https://services.eot.state.ma.us/cr>) and document their dissemination.*

As stated, this the document has been reviewed by staff and presented to the JTC and other groups. While lengthy it does provide guidance on actions regarding complaints and investigation. We will improve upon our public discussions of these programs.

- VIII. Funding Distribution Analysis: *Please provide a map(s) depicting the locations of transit related investments (both federal and state dollars) in the current TIP. The base layer(s) should show percent minority and percent low-income, by Census tract.*



a. Please include a description of the methodology used to determine the geographic location of transit investments. For instance, how is the MPO representing service-area wide transit investments? What about investments that are not conducive to mapping?

The Martha's Vineyard Transit Authority (VTA) bus routes cover the entire island. Transit investments are designed and completed by the VTA, in coordination with the Towns and with input from the public and the VTA's consumer advisory board. Since the transit service is established island-wide, the methodology for future growth comes more in the form of supporting the VTA to keep operations current, assistance in TIP funding should the federal highway funding not be used for roads, and with further integrating transit in the other areas of growth on the Island.

The MVC and the VTA work cooperatively to ensure that transit services meet the needs of the community. The MVC has committed to assisting the VTA with consumer surveys to measure customer satisfaction. In addition, the MVC oversees developments of regional impact and

involves the VTA to ensure that transit is one of the key elements considered when projects are going through the approval process. The MVC has and will continue to support the VTA with technical support and grant writing assistance, as needed.

Recently, the VTA has embarked on transitioning their bus fleet from diesel to all battery electric buses. The goal is having an entirely electric fleet within the next seven years. This has resulted in improvements to provide renewable energy charging stations and other infrastructure improvements as well as bus purchases.

- IX. *“Engage” Contact Data: MassDOT continues to refine the “Engage” suite of Title VI and ADA related public engagement tools on the GeoDOT platform. Recent upgrades to the database for contact information requires the attention of MPO/RPA staff to ensure that data housed in the platform is up to date and includes all relevant attributes. Please consider the following list of needed updates as part of your ongoing efforts to keep this content relevant. For this reporting cycle, it is particularly important that MassDOT receive updated data in the fields of “Service Area,” “Public Organization,” and “Category/Subcategory.” For a full list of organization and contact attributes, please consider the tables below.*

“Engage” Database Fields for Organization Data:

Field Name	Required	Description
Organization Name	Yes	Joint Transportation Committee (JTC) of Martha’s Vineyard. Made up of the 6 towns of Martha’s Vineyard. Staff is made up of professionals from the Martha’s Vineyard Commission
MPO	Yes	Martha’s Vineyard Joint Transportation Committee
Website	Yes, where applicable	www.mvcommission.org
Category	Yes	Regional Transportation Committee Regional Planning Agency
Primary Contact	Yes, where Applicable	Adam Turner; turner@mvcommisison.org - Director Mike Mauro mauro@mvcommission.org – Transportation Planner 508-693-3453
Service Area	Yes	Regional – Island of Martha’s Vineyard
Public Organization	Yes	Martha’s Vineyard Towns and MVC

“Engage” Database Fields for Contact Information:

Field Name	Required	Description
First Name	Yes	Adam
Last Name	Yes	Turner
Position	Yes	Executive Director
Address	Yes	33 New York Ave
Town	Yes	Oak Bluffs
State	Yes	MA
Zip code	Yes	02557
Zip code extension	No	1447
Phone	Yes	508-693-3453
Phone Extension	No	111
Email	Yes	turner@mvcommission.org