

# **Title VI Process Review SWR 2011**

**May 20, 2011**

## **REGIONAL PLANNING ORGANIZATIONS QUESTIONS**

- 1. Have the MPO's updated their demographic profile of the metropolitan planning area that includes identification of the locations of socio-economic groups, including low-income and minority populations as addressed by the Executive Order on Environmental Justice and Title VI provisions? If so, how does the demographic profile identify the locations of the socio-economic groups? Please submit a sample.**

SWRPA recently issued a report summarizing key findings from the 2010 Census and 2005-2009 American Community Survey, with comparisons to 2000 Census figures. The [\*People and Places of the South Western Region of Connecticut: An Examination of 2010 Census and 2005-2009 American Community Survey Data\*](#) report presents current findings and trends, with supporting tables, charts, and maps. The report includes socio-economic, racial and ethnic composition and income statistics for the Region.

SWRPA also issues an annual environmental justice summary, which identifies the locations of communities of concern based on the following four criteria:

- percent of minority population (all persons except those identifying themselves as White, not Hispanic),
- per capita income,
- percent of persons below the poverty level,
- percent of households receiving public assistance income,

Beginning in 2006 the demographic profiles used by SWRPA to identify communities of concern/EJ populations were developed using Census Block Groups based on the data available from the 2000 Census. In May of 2011 demographic profiles for the region were updated using the U.S. Census Bureau, 2010 Redistricting Data Summary File, and 2005-2009 American Community Survey 5-Year Estimates. Unfortunately these data are only available at the Census Tract level. Because of this, SWRPA's latest demographic profiles of the EJ and Title VI population were developed for Census tracts only. Future demographic profiles will be developed using the smallest geography for which data are available.

Samples of the demographic profiles prepared for the region using Census Block Groups and Census tract are included in Attachment A.

- 2. Does the MPOs' Planning process seek to identify the needs of low-income and minority populations? If so, how does the Planning process identify these needs? In addition, does the Planning process seek to utilize demographic information to examine the distributions across these groups of the benefits and burdens of the transportation investments included in the TIP? Finally, what methods are used to identify imbalances?**

The SWRMPO's planning process seeks to engage communities of concern (defined above in Question 1) in the planning process and to ensure fair treatment of all citizens with respect to the distribution of benefits and burdens arising from transportation projects, programs and policies in the region. SWRPA regularly reviews the policies and practices of the SWRMPO and the Agency to ensure compliance with federal regulations concerning Environmental Justice, Title VI, and Limited English Proficiency. SWRPA annually assesses the Region's transportation planning program for compliance with applicable regulations to ensure that benefits and burdens are not disproportionately distributed. SWRPA also prepares an Environmental Justice assessment with each major revision to the Region's Long Range Transportation Plan (LRTP) and Transportation Improvement Program (TIP).

The SWRMPO adheres to a Public Participation Plan, which ensures that information is easily accessible and understandable to all members of the community. The [2009 Public Participation Plan for the South Western Region Metropolitan Planning Organization](#) was developed to help all stakeholders participate actively in the Region's transportation planning program. All regular SWRMPO activities follow the recommended public involvement strategies outlined in the Public Participation Plan. Project-specific Public Involvement Plans (PIP) are developed for special projects and studies. Project specific PIP's ensure that the unique requirements of each study area are addressed and that all study area residents have access to relevant project information. In order to identify the needs of the community, all SWRMPO projects and activities are developed through a collaborative planning process with input from the Transportation Technical Advisory Group (TTAG), municipalities, and other nongovernment organizations as appropriate. SWRPA regularly works with groups and organizations that are members of communities of concern to facilitate outreach and involve the public in the planning process.

Considerations for impacts to the traditionally underserved are also identified in the Environmental Justice report prepared as part of the Transportation Improvement Program and the Long Range Transportation Plan. The methods used to assess the benefits and burdens associated with transportation investments in the Region and potential imbalances are discussed in SWRPA Question B and included in the [South Western Region Environmental Justice Annual Assessment 2011](#).

- 3. Does the MPOs' public involvement process have an identified strategy for engaging minority and low-income populations in transportation decision-making? Secondly, what mechanisms exist to ensure that the public's issues and concerns are addressed? Also, what strategies, if any, have been implemented to reduce participation barriers for such populations? Finally, has their effectiveness been evaluated?**

The South Western Region public involvement process seeks to involve all members of the community and to ensure that all interested individuals and groups have access to pertinent project information. A customized outreach program is developed for the TIP, LRTP, major construction projects, and planning studies. Project specific public involvement plans are developed to ensure that the unique requirements of each study area are addressed and that all study area residents have access to relevant project information. The core of the outreach program includes media releases and legal notices of meetings, identification of stakeholders through the chief elected officials, planners, and community organizations, posting of all pertinent materials online, and use of visualization techniques whenever possible. It is SWRPA's practice to document all activities, to record all input, prepare responses, and to summarize all outreach activities. A description of techniques employed can be found in the [2009 Public Participation Plan for the South Western Region Metropolitan Planning Organization, FY2010 Public Involvement Annual Evaluation and Summary, Title VI and Limited English Proficiency Annual Assessment and Compliance Summary Report, South Western Region Metropolitan Planning Organization](#), Question 2 (above) and SWRPA Question H. The process used to evaluate public involvement is discussed as part of SWRPA Question G and is addressed in the reports listed above.

- 4. Has public involvement in the MPOs' Planning process been routinely evaluated as required by regulation? In addition, have efforts been undertaken to improve performance, especially with respect to low-income and minority populations? Also, have organizations representing low-income and minority populations been consulted as part of this evaluation? Finally, have their concerns been considered?**

The process used to evaluate public involvement is discussed as part of SWRPA Question G and are addressed in the [2009 Public Participation Plan for the South Western Region Metropolitan Planning Organization, FY2010 Public Involvement Annual Evaluation and Summary, Title VI and Limited English Proficiency Annual](#)

[Assessment and Compliance Summary Report, South Western Region Metropolitan Planning Organization](#), Questions 2 and 3(above).

As discussed in SWRPA Question C, SWRPA works with community groups and organizations as well as through locally coordinated human services transportation planning (LOCHSTP), transit agencies, Region 1 Emergency Management and Homeland Security activities, and municipal departments to identify and address the needs of communities of concern. Project specific public involvement plans are also developed to ensure that the unique requirements of each study area are addressed and all study area residents have access to relevant project information.

**5. Does the MPOs' public outreach effort utilize media (such as print, television, radio, etc.) targeted to low-income or minority populations? If so, what media vehicle is utilized? Please provide listing of media vendors used and a sample.**

SWRPA uses other media and methods besides traditional newspaper legal notices and mailing to reach out to the public regarding upcoming events and new publications. Prior to 2008, SWRPA placed legal notices of upcoming meetings in the Region's two highest circulation newspapers (Stamford Advocate and Norwalk Hour.) This method was costly and yielded little, if any, participation at meetings. Recognizing the inefficiency of this method, [The 2009 Public Participation Plan for the SWRMPO](#) recommended issuing news releases to a broad list of local and state media outlets. This list includes both daily and weekly newspapers, local radio stations, television stations, Spanish-language media, and online media outlets. This method has proved more fruitful, resulting in numerous articles and news reports and additional public participation at meetings. Additional information regarding the techniques employed by SWRPA are included in SWRPA Question H.

SWRPA's media distribution list and a sample media release have been included in Attachment B

**6. How has the MPO included Title VI and Environmental Justice in the following:**

The SWRMPO is committed to ensuring that all transportation planning, policies and programs are equitable and information is available to all interested members of the community. An Environmental Justice evaluation of the South Western Region's TIP and LRTP has been completed annually since 2004. Beginning in 2003 and continuing until the present, SWRPA has included reports on Title VI, EJ and LEP activities in the quarterly reports submitted to CTDOT (Field Coordination) and FHWA and FTA (contacts.) Additionally, [a Title VI and Limited English Proficiency Assessment and Compliance Summary Report](#) has been completed annually for the South Western Region since 2009. The region maintains a [Title VI policy and complaint procedure](#) and a strategy for addressing limited English Proficiency in [English](#) and in [Spanish](#).

**a. The Long-range Transportation Plan?**

In addition to the items listed above, an Environmental Justice Evaluation is completed for each major revision to the LRTP. The [South Western Region Environmental Justice Annual Assessment 2011](#) includes an assessment of potential benefits and burdens upon the communities of concern resulting from projects recommended in the 2011-2040 LRTP. Public Review was conducted following the process established by the [2009 Public Participation Plan for the South Western Region Metropolitan Planning Organization](#), which was developed to comply with federal regulations dealing with Title VI, Environmental Justice and Limited English Proficiency. All public information sessions were held in transit accessible locations and at ADA compliant facilities. Media releases were issued in both English and Spanish and all information was posted online: <http://www.swrpa.org/Default.aspx?Transport=40>.

Upon USDOT approval of the 2011-2040 LRTP the executive summary will be translated and made available online in Spanish.

**b. The Transportation Improvement Program?**

In addition to the items listed above an Environmental Justice Evaluation is completed for each major revision to the TIP. The [South Western Region Environmental Justice Annual Assessment 2011](#) reviews the potential benefits and burdens projects included in the 2010-2013 TIP may have on communities of concern. Public Review for the 2010-2013TIP was conducted following the process established by the [2009 Public Participation Plan for the South Western Region Metropolitan Planning Organization](#), which was developed to comply with federal regulations dealing with Title VI, Environmental Justice and Limited English Proficiency. All public information sessions were held in transit accessible locations and at ADA compliant facilities.

**c. The Unified Planning Work Program?**

Each South Western Region Unified Planning Work Program contains Title VI, EJ and LEP as tasks. The current work program, *South Western Region FY2010 & FY2011 Unified Planning Work Program*, identifies objectives that support full public participation, the integration of CTDOT and USDOT environment justice and limited English proficiency in the planning process, and ensures compliance with Title VI. Refer to Task 3, pages 24-25 of the current UPWP.

[http://www.swrpa.org/Uploads/FY11&12%20UPWP-Final\\_6-15-10.pdf](http://www.swrpa.org/Uploads/FY11&12%20UPWP-Final_6-15-10.pdf)

**d. The Public Involvement Plan?**

The South Western Region public involvement process seeks to involve all members of the community and to ensure that all interested and affected individuals have access to pertinent project information. The [2009 Public Participation Plan for the South Western Region Metropolitan Planning Organization \(2009 PPP\)](#) was developed to comply with federal regulations dealing with Title VI, Environmental Justice and Limited English Proficiency. The [Title VI and Limited English Proficiency Annual Assessment and Compliance Summary Report](#) also includes a section on “Inclusive Public Participation,” which lists standard and ongoing practices, activities planned for implementation during the next fiscal year and future year goals that support outreach to communities of concern.

**7. Has the MPO reviewed its decision-making process or developed written policies or criteria that address consideration of all populations served by the RPO? Please provide policy.**

The South Western Region public involvement process seeks to involve all members of the community and to ensure that all interested and affected individuals and groups have access to pertinent project information. The following policies have been developed to ensure an inclusive and robust public participation program and are included in Attachment C:

- [South Western Region Transportation Planning Program’s Title VI Policy and Complaint Procedure](#); issued June 1, 2005 and revised January 15, 2010. To date no complaints have been filed.
- [South Western Region Strategy for Addressing Limited English Proficiency](#) (The Spanish Translation is posted online); issued May 12, 2011.
- The [2009 Public Participation Plan for the South Western Region Metropolitan Planning Organization](#); issued December 4, 1997 and revised May 28, 2009.
- [MPO Operating Procedures](#); issued June 23, 1981 and revised June 26, 2006.
- [MPO Planning Roles and Responsibilities](#); revised June 30, 2008.
- South Western Region [Affirmative Action Policy Plan and Policy Statement](#); updated January 18, 2011

**8. How does the MPO provide access to public comments or other types of public input for decision-making?**

The South Western Region metropolitan transportation planning program actively seeks public involvement and comment in the overall program, individual tasks and special projects, as well as at technical (Transportation Technical Advisory Group) and policy (South Western Region MPO) meetings. As previously noted in SWRPA Question D, project specific public involvement plans are developed for metropolitan transportation plan activities. Meeting notices are sent to the media, stakeholders, posted on the SWRPA and special project websites, as are opportunities to comment and other ways to get involved. Any comments received are documented in meeting minutes and summaries, which are posted online. For core metropolitan transportation planning requirements including but not limited to the Long Range Transportation Plan, TIP, Air Quality Conformity, and special studies, a list of comments received and their disposition are recorded in a public involvement summary and made available to the public and stakeholders on the SWRPA and project websites and at technical, policy and advisory committee meetings. In addition, public involvement, Title VI, LEP, and DBE contract compliance are documented in quarterly reports. Annual assessments are performed and used to refine the processes and programs based on the findings and recommendations gleaned from SWRPA's experience and research on best practices.

**9. Are you following your Limited-English Proficiency plan?**

Recommendations from the [South Western Region, Strategy for Addressing Limited English Proficiency](#) are regularly implemented as part of the Region's transportation planning program. Compliance is documented in *Title VI and Limited English Proficiency Annual Assessment and Compliance Summary Report, South Western Region Metropolitan Planning Organization* completed annually by SWRPA and in project specific public involvement plans.

**10. What manner of Transit monitoring do you perform as it relates to Title VI, LEP and E.J.?**

SWRPA works with and provides technical assistance to various stakeholders, including transit operators, on activities that monitor the transit system. However, much of the monitoring work is done by the transit operators themselves, which in the South Western Region are CT Transit, Norwalk Transit District, and CTDOT Rail Operations. Through LOCHSTP program coordination, evacuation planning, and on-going collaboration with transit operators, SWRPA identifies transit services, needs/gaps, and opportunities, and develops recommendations for projects, programs and services that relate to transit and other transportation operations that advance Title VI objectives, assist EJ communities of concern, and consider the needs of the LEP population.

**11. Do you have a Title VI Complaint process? If so, please provide a copy.**

SWRPA issued a formal Title VI complaint procedure in 2005, which is annual reviewed as part of the [Title VI and Limited English Proficiency Annual Assessment and Compliance Summary Report, South Western Region Metropolitan Planning Organization](#) and updated as necessary. The current [South Western Region Transportation Planning Program's Title VI Policy and Complaint Procedure](#), issued January 15, 2010 is posted on the SWRPA website and included in Attachment C.

**12. Has your Title VI Policy and Title VI Complaint process been added to your RPO website? If yes, please provide a link to that website.**

The Title VI Policy and Complaint procedure are posted on the SWRPA website under the Policies: <http://www.swrpa.org/Default.aspx?About=239>, and Environmental Justice, Title VI and LEP: <http://www.swrpa.org/Default.aspx?Transport=152>.

**13. Do you coordinate with Native American Tribal Governments?**

Not applicable to the South Western Region.

**14. Are contracting opportunities for planning studies, corridor studies and other technical work available to all groups/persons? How are these contract opportunities advertised?**

Contracting opportunities for planning studies, corridor studies, and other technical work are open to all groups and persons. SWRPA's procurement policy meets or exceeds the standards set forth by its Federal and State funding partners. Contracting opportunities are advertised in a number of locations in order to ensure that the work is open to all groups and persons and that SWRPA receives a sufficient number of responses to guarantee a competitive procurement process. All contracting opportunities are at a minimum posted to the procurement section of SWRPA's website and the e-procurement portal of Connecticut Department of Administrative Services' website. Depending on the nature of the goods or services being procured, contracting opportunities may also be advertised with professional associations, trade groups, and third party sites like Craigslist.org. SWRPA also provides information about transportation contracting opportunities directly to consultants and firms on Connecticut Department of Transportation pre-qualified consultant list. See CTDOT Consultant Services website for the current pre-qualified consultants list:

<http://www.ct.gov/dot/cwp/view.asp?a=1527&q=300754>

The legal notices that accompany RFPs/RFQs always contain language which states that "Disadvantaged Business Enterprises certified by the Connecticut Department of Transportation are strongly encouraged to submit a proposal/statement of qualification." For more information, please Attachment D *Recommended Procurement Process*.

**15. How do you ensure that the required Title VI requirements are incorporated into subcontracts and agreements initiated by your RPA?**

SWRPA agreements with consultants include any and all Title VI requirements. The SWRPA-consultant agreement is reviewed before execution by the CTDOT project manager to assure the correct Title VI and other requirements are included as provisions.

All agreements by and between SWRPA and a consultant include an article that requires the signee to "comply with all applicable federal, state, and local laws in the jurisdictions in which the services covered under this Agreement are performed."

**ARTICLE XIII. COMPLIANCE WITH OTHER LAWS**

The CONSULTANT agrees to comply with all applicable federal, state and local laws in the jurisdictions in which the services covered under this Agreement are performed. Further, the CONSULTANT shall cause all persons employed by him including subcontractors, agents, officers, and employees to comply with all such applicable laws. Any persistent, deliberate, or substantial failure of the CONSULTANT, his sub-contractors, agents or employees to comply with such laws may result in the cancellation or termination of this Agreement.

All agreements by and between SWRPA and consultant include an article which states that the consultant must agree to not discriminate nor permit discrimination against any groups or persons.

**ARTICLE VIII. NONDISCRIMINATION IN CONTRACTS**

**A.** The contractor agrees and warrants that in the performance of this contract he will



not discriminate or permit discrimination against any person or group of persons on the grounds of race, color, religious creed, age, marital status, national origin, sex, mental retardation or physical disability, including, but not limited to, blindness, unless it is shown by such contractor that such disability prevents performance of the work involved, in any manner prohibited by the laws of the United States or of the State of Connecticut. If the contract is for a public works project, the contractor agrees and warrants that he will make good faith efforts to employ minority business enterprises as subcontractors and suppliers of materials on such project. The contractor further agrees to provide the commission on human rights and opportunities with such information requested by the commission concerning the employment practices and procedures of the contractor as relate to the provisions of this section and section 46a-56. For the purposes of this section, 'minority business enterprise' means any subcontractor or supplier of materials fifty-one per cent or more of the capital stock, if any, or assets of which is owned by a person or persons: (1) Who are active in the daily affairs of the enterprise; (2) who have the power to direct the managements and policies of the enterprise; and (3) who are members of a minority, as such term is defined in subsection (a) of section 32-9n of the Connecticut General Statutes.

**B.** For the purposes of this section, 'good faith' means that degree of diligence which a reasonable person would exercise in the performance of legal duties and obligations. 'Good faith efforts' shall include, but not be limited to, those reasonable initial efforts necessary to comply with statutory or regulatory requirements and additional or substituted efforts when it is determined that such initial efforts will not be sufficient to comply with such requirements.

**C.** Determination of the contractor's good faith efforts shall include but shall not be limited to the following factors: The contractor's employment and subcontracting policies, patterns, and practices; affirmative advertising, recruitment and training; technical assistance activities and such other reasonable activities or efforts as the commission may prescribe that are designed to ensure the participation of minority business enterprises in public works projects.

**D.** The contractor shall develop and maintain adequate documentation of its good faith efforts.

If a Consultant is found to be in violation of these articles, SWRPA has the right to terminate an Agreement.

For consultant contracts with a Disadvantaged Business Enterprise set aside, SWRPA tracks project expenditures and works with the consultant to ensure that all requirements are met or exceeded.



## **South Western Regional Planning Agency**

Identified areas the SWRPA needs to commit resources and staff to in the coming year(s).

### **A. Reexamine the demographic profile using Census Block Groups (rather than Census Tracts) to be sure that all Title VI/EJ population clusters are being addressed.**

SWRPA regularly reexamines the Region's demographic profile based on a number of criteria included Title VI and EJ populations. SWRPA is committed to developing demographic profiles, using the smallest geography for which reliable and accurate data are available.

Beginning in 2006 the demographic profiles used by SWRPA to identify communities of concern/EJ populations were developed using Census Block Groups based on the data available from the 2000 Census. In May of 2011 demographic profiles for the region were updated using the U.S. Census Bureau, 2010 Redistricting Data Summary File, and 2005-2009 American Community Survey 5-Year Estimates. Unfortunately these data are only available at the Census Tract level. Because of this, demographic profiles were developed for Census tracts only. Future demographic profiles will be developed using the smallest geography for which data are available.

Samples of the demographic profiles prepared for the region using Census Block Groups and Census tract are included in Attachment A.

### **B. Examination of the distributions of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.**

The [\*South Western Region Environmental Justice Annual Assessment 2011\*](#) included a simple evaluation of the potential benefits and burdens upon communities of concern resulting from projects listed in the 2010-2013 TIP and 2011-2040 LRTP. The criteria used to assess the potential benefits and burdens of projects, based on best available information, are summarized below.

Based on a review of the demographic profile of the Region and communities of concern, as well as the travel patterns of communities of concern, the following categories were used to evaluate the benefits and burdens of transportation investments in the Region:

- Local congestion impacts
- Air quality impacts
- Access to transit
- Bike or pedestrian access
- Location in an LEP community
- Funding allocations:
  - Proportion of funding for projects located in communities of concern
  - Proportion funds benefiting communities of concern
  - Proportion funds for projects with potential burdens to communities of concern
  - Proportions of funds for projects with in communities of concern with no impact
  - Proportion of total funding allocated to bus services
  - Proportion of total funding allocated to rail services

Additional information on the benefits and burdens assessment and evaluation criteria are included in the 2011 assessment.

SWRPA will continue to research best practices used by other agencies to evaluate the distribution of benefits and burden associated with projects included in the TIP and LRTP and will continue to work to enhance the evaluation process.

### **C. Begin efforts to develop a Title VI/EJ Committee.**

SWRPA has chosen to continue working with community groups and organizations that are often members of communities of concern or located in geographic areas identified as Title VI/EJ stakeholders rather than create a Title VI/EJ Committee. This approach ensures diversity in outreach through special projects or technical assistance in transportation planning, regional planning, emergency management and environmental planning. Through the locally coordinated human services transportation planning (LOCHSTP), the needs and gaps in transit services are identified by the Bridgeport-Stamford Urbanized Area Working Group coordinated by SWRPA staff. Ongoing technical assistance to the Norwalk Transit District keeps SWRPA and the metropolitan transportation planning program in touch with the needs of transit dependent and ADA eligible populations in the region. In the conduct of corridor studies, socioeconomic characteristics are considered and public involvement helps shape the plans and programs that are developed. Through Region 1 Emergency Management and Homeland Security activities, SWRPA engages municipal emergency management programs in the development of mass care, sheltering and evacuation planning. SWRPA staff serves as the Chair of the Region 1 ESF 1 Transportation Committee, are members of the Region 1 Emergency Planning Team, and coordinate and support the Region 1 Citizen Corps Council.

In addition to these planning and interactive activities that support the goals of Title VI and environmental justice, SWRPA makes quarterly reports on Title VI, EJ and Limited English Proficiency to CTDOT and USDOT. Beginning in the last quarter of FY2011, SWRPA will engage the region's Transportation Technical Advisory Group (TTAG) and the South Western Region Planners in quarterly discussions of Title VI/EJ/LEP issues and opportunities. The TTAG meets monthly and South Western Region Planners meet each quarter. These new initiatives will be reported in the quarterly reports submitted to CTDOT and USDOT.

### **D. Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.**

SWRPA uses the Census Bureau's definition of linguistically isolated households to identify LEP populations in the region. The Census Bureau defines a linguistically isolated household as "one in which no member 14 years old and over (1) speaks only English or (2) speaks a non-English language and speaks English 'very well.' In other words, this definition includes all members 14 years old and over who have at least some difficulty with English."<sup>1</sup>

Both decennial census data and American Community Survey data collected by the US Census Bureau have been used to identify LEP populations. A demographic profile of the Region was recently completed, [\*People and Places of the South Western Region of Connecticut: An Examination\*](#)

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<sup>1</sup> U.S. Census Bureau, *2000 Census of Population and Housing, Summary File 3.*

[of 2010 Census and 2005-2009 American Community Survey Data](#), using U.S. Census Bureau, 2010 Redistricting Data Summary File and 2005-2009 American Community Survey 5-Year Estimates. This report identified 7% of the Region’s residents as linguistically isolated (LEP), with 53% of the LEP population identified as Spanish speakers. Thirty-seven percent of LEP population speaks another Indo-European language, while the remaining 10% speak some other language.<sup>2</sup>

[The 2009 Public Participation Plan for the SWRMPO](#) built upon the fact that Spanish was the most prominent language other than English spoken in the region. A number of recommendations were incorporated into the public participation plan to improve access to information by and engage residents with limited English proficiency. As recommended in the public participation plan, project specific public involvement plans are developed to help tailor outreach efforts to the needs of individual communities. For projects affecting an area with a population identified as having LEP households, public involvement plans call for informational materials and notices to be provided in both English and Spanish (or the appropriate non-English language). Additionally, the demographic profile of project study areas are evaluated when developing the project scope of work and the demand for interpreters are considered.

Additionally, a link to the Google Translate service is prominently placed on the front of SWRPA’s homepage, which lets people view any page and some documents on the website in more than fifty other languages.

**E. Continue to update the Region’s website, to include a notice regarding availability, where practical, of alternative language documents. This could include a summary of major RPO documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)**

SWRPA uses its website, [www.swrpa.org](http://www.swrpa.org), as the primary means of disseminating information about the agency’s activities. The website underwent a complete overhaul in 2009. The front page of the website has a calendar bar that lists all upcoming meeting and links to additional information. A “What’s New?” bar identifies recently completed projects, public involvement opportunities, and other newsworthy items, and links directly to project web pages and reports. SWRPA regular posts all meeting notices, agendas and summaries on the website along with project reports, presentations and other relevant information.

A translation link is located on the front page of the website, which can be used to translate the website and some documents into Spanish or more than fifty other languages using Google Translate. Information on how to arrange for special language accommodations is included with all media releases issued by the SWRMPO; and included on meeting agendas and on the SWRMPO website in both English and Spanish (see F below).

Where translations have been completed, documents are posted in both English and Spanish, including:

- The [South Western Region Strategy for Addressing Limited English Proficiency](#)
- The [Guide to the SWRMPO](#) Brochure

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<sup>2</sup> South Western Regional Planning Agency (May 2011) [People and Places of the South Western Region of Connecticut: An Examination of 2010 Census and 2005-2009 American Community Survey Data](#)

- Coming in 2011: The executive summary of the *Long Range Transportation Plan: Going Forward - The Plan to Maintain & Improve Mobility*

**F. Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)**

Information on how to arrange for special accommodations is included with all media releases issued by the SWRMPO; and included on meeting agendas and the SWRMPO website in both English and Spanish:

*To arrange for special accommodations or translation services contact SWRPA at least five (5) days prior to the meeting at (203) 316-5190 (voice only)*

*Para organizar especial de alojamiento o los servicios de traducción en contacto con SWRPA al menos cinco (5) días antes de la reunion al (203) 316-5190 (sólo voz)*

**G. Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.**

Included in the 2009 updated of the SWRMPO public participation plan, were the recommendations to develop a framework for evaluation of the plan and its recommendations; and to conduct annual reviews of the plan for compliance and effectiveness. An evaluation matrix was developed by SWRPA to monitor implementation of the [2009 Public Participation Plan for the SWRMPO](#) and evaluate the effectiveness of recommendations. A public involvement summary report is also completed annually and posted on the SWRMPO public involvement webpage. The first assessment, [FY2010 Public Involvement Annual Evaluation and Summary](#), was completed in September 2010.

**H. Consider alternative techniques other than newspapers and mailings to get out information regarding meetings.**

SWRPA uses media and methods besides traditional newspaper legal notices and mailing to reach out to the public regarding upcoming events and new publications. Prior to 2008, SWRPA placed legal notices of upcoming meetings in the Region's two highest circulation newspapers (Stamford Advocate and Norwalk Hour.) This method was costly and yielded little, if any, participation at meetings. Recognizing the inefficiency of this method, [The 2009 Public Participation Plan for the SWRMPO](#) instead recommended issuing news releases to a broad list of local and state media outlets. This list includes both daily and weekly newspapers, local radio stations, television stations, Spanish language media, and online media outlets. This method has proved more fruitful, resulting in numerous articles and reports and increased public participation at meetings.

For some large projects, SWRPA has used more personal and innovative methods to encourage participation at meetings. This has been especially true of SWRPA's major corridor studies. For the *US 1-Darien Study*, the technical advisory committee (TAC) sent hand written notes to key stakeholders to invite them to a study meeting. For the *US 1 Greenwich-Stamford Study*, the TAC telephoned stakeholders in the corridor to let them know about a study workshop. After the phone call, the TAC sent stakeholders an email containing information about the workshop, which they were asked to forward to others who might be interested.

Meeting agendas and summaries are regularly posted to SWRPA's website. SWRPA's website update, launched in 2009, includes a calendar module on the front page that lists all upcoming meetings and links to more information. Building on its internet presence, SWRPA has experimented with pushing meeting information through social media like Facebook and Twitter. Social media postings point back to SWRPA's website or in the case of some large studies, a project website.

SWRPA has also experimented using a meet-and-greet at a public location to get the word out about major studies. For the *South Western Region Long Range Transportation Plan, 2011 – 2040*, SWRPA set up tables at the Norwalk Library, Stamford Government Center, and Westport Library to talk to passersby about the plan and let them know how they could comment.

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

Since FY2003 SWRPA has included reports on Title VI, EJ and LEP activities in the quarterly reports submitted to CTDOT (Field Coordination) and FHWA and FTA (contacts). Additionally, each South Western Region Unified Planning Work Program contains Title VI, EJ and LEP as tasks, refer to Regional Planning Organizations Questions 6c for further information.

## **Attachment A**

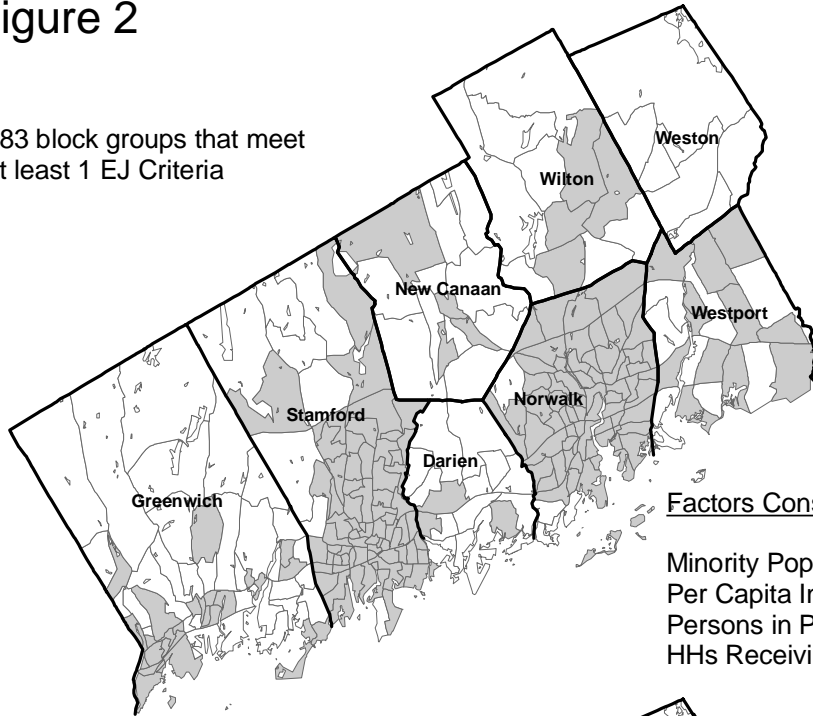
Map of Communities of Concern using Census Block Group  
(excerpt for the *South Western Region Environmental Justice Annual Assessment July 2007*)

Map of Communities of Concern using Census Tracts  
(excerpt for the *South Western Region Environmental Justice Annual Assessment May 2011*)

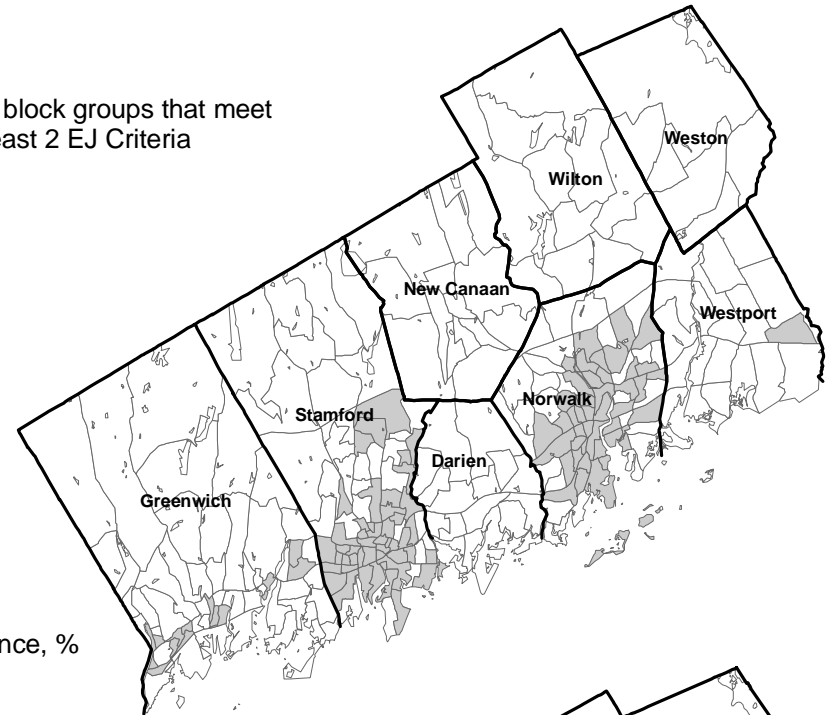
# Census Block Groups That Met Multiple Environmental Justice Criteria

## Figure 2

183 block groups that meet at least 1 EJ Criteria



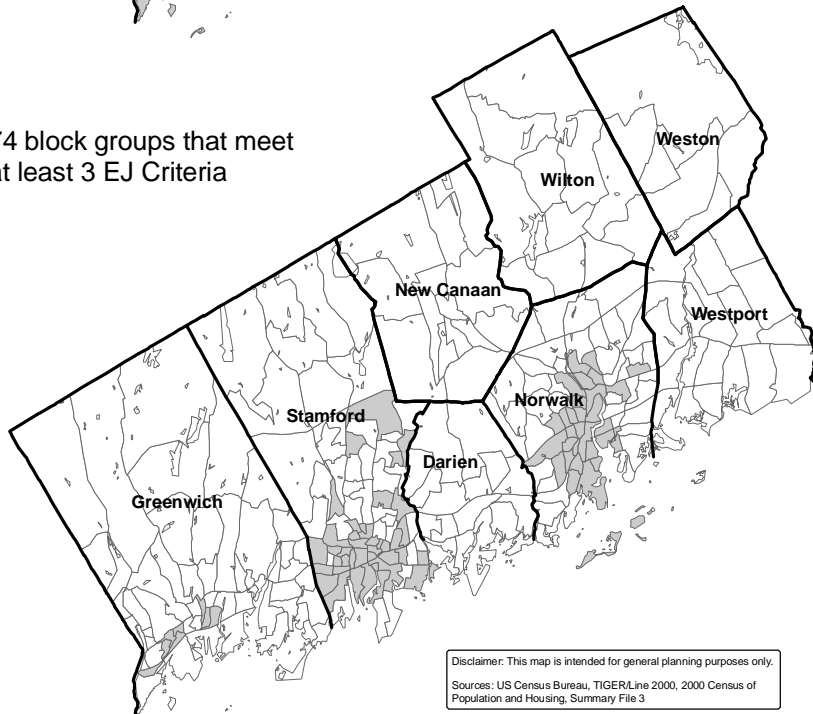
102 block groups that meet at least 2 EJ Criteria



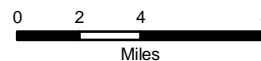
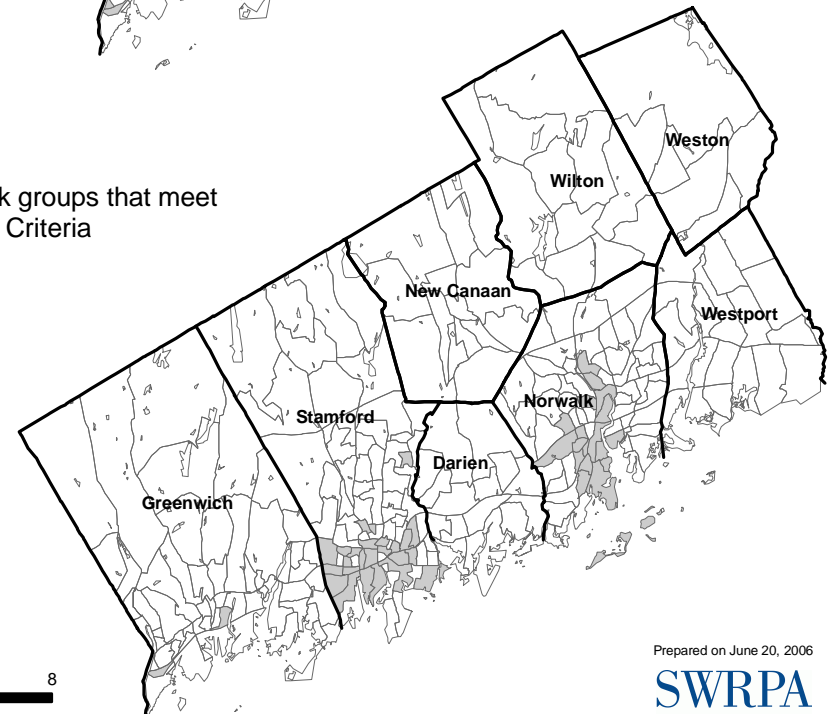
Factors Considered:

- Minority Population, %
- Per Capita Income
- Persons in Poverty, %
- HHs Receiving Public Assistance, %

74 block groups that meet at least 3 EJ Criteria



42 block groups that meet all 4 EJ Criteria



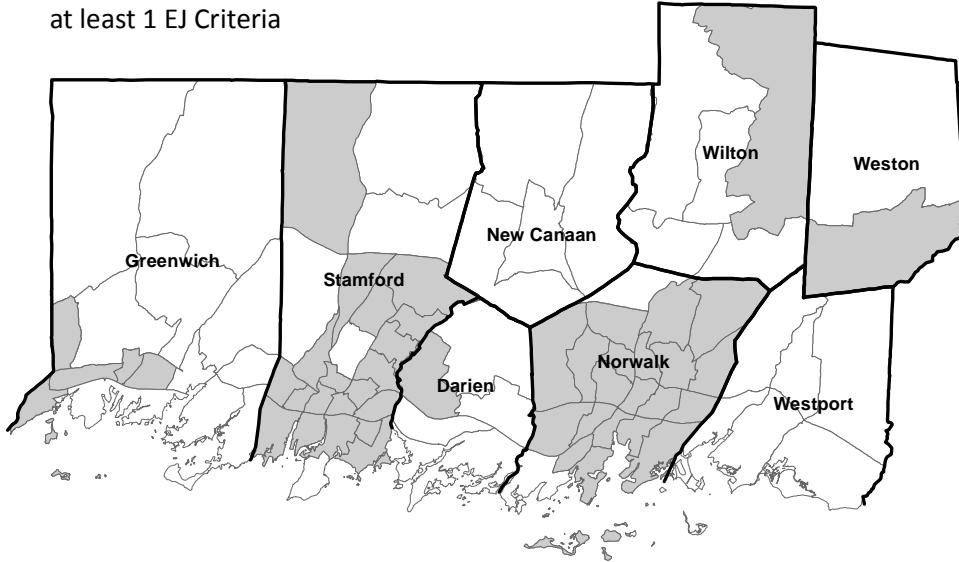
Disclaimer: This map is intended for general planning purposes only.  
Sources: US Census Bureau, TIGER/Line 2000, 2000 Census of Population and Housing, Summary File 3



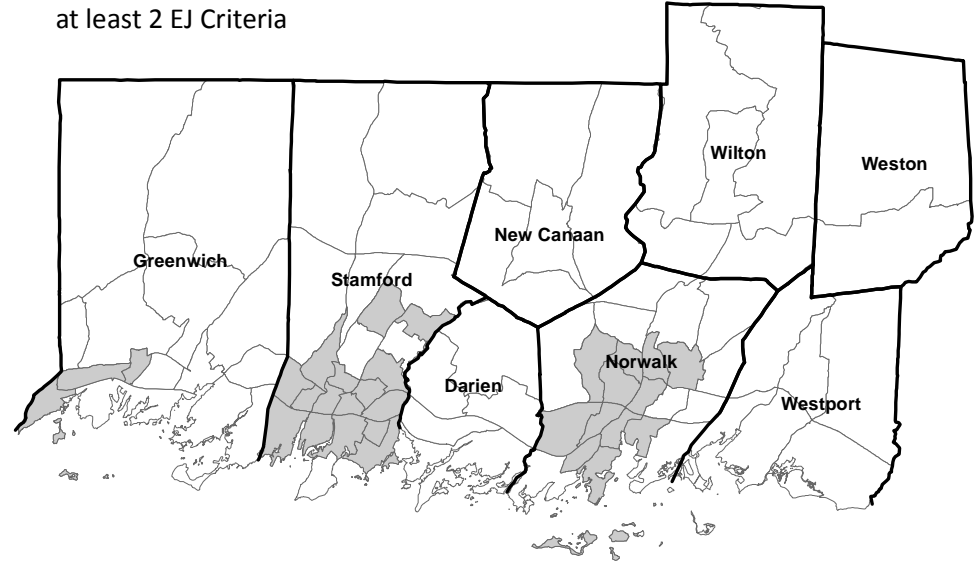
# Census Tracts That Met Multiple Environmental Justice Criteria

## Figure 2

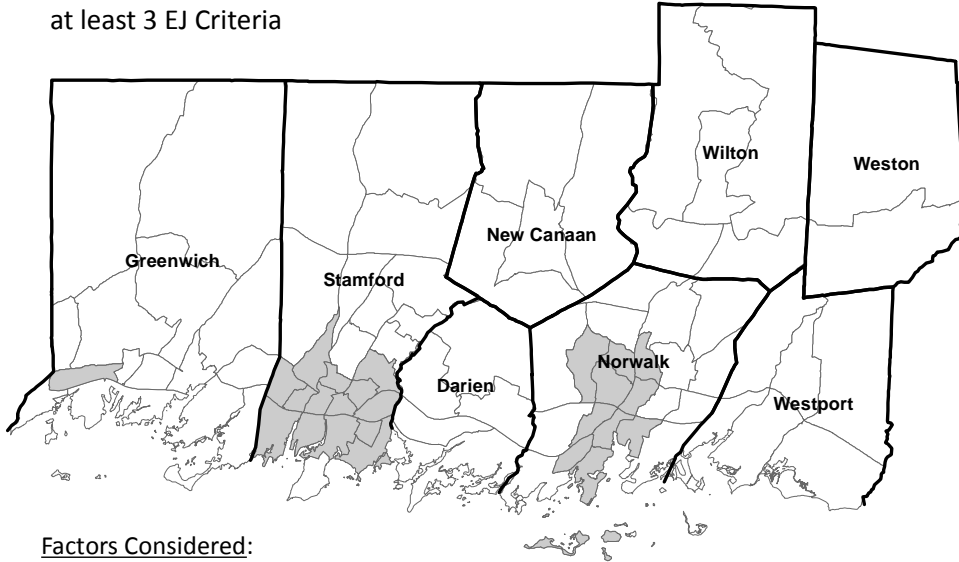
48 Census tracts that meet at least 1 EJ Criteria



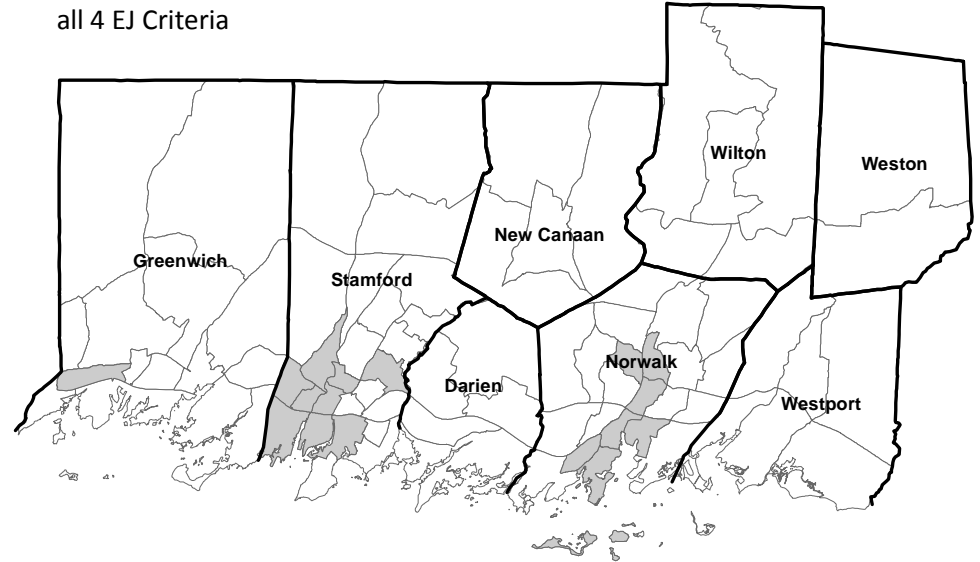
31 Census tracts that meet at least 2 EJ Criteria



25 Census tracts that meet at least 3 EJ Criteria

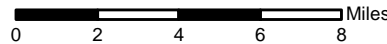


17 Census tracts that meet all 4 EJ Criteria



### Factors Considered:

- Minority Population, %
- Per Capita Income
- Persons in Poverty, %
- HHs Receiving Public Assistance, %



Disclaimer: This map is intended for general planning purposes only.  
Sources: US Census Bureau, TIGER/Line 2010, 2010 Census Redistricting Data and 2005-2009 American Community Survey



## **Attachment B**

SWRPA's Media Distribution list

Sample Media Release

**SWRPA Media List as of 5/18/2011**

Company	E-mail	Business Phone	Business Fax	Categories
WSTC/WNLK Radio	jennifer.barbin@coxradi.com	Jennifer Barbin	(203) 845-3094	Media
CT Rail Commuter Council	cameron06820@gmail.com	(203) 655-0138	(203) 655-4752	Media
Wilton Patch	christian@patch.com	(203) 675-3120		Media
Stamford Advocate	martin.cassidy@scni.com	(203) 964-2264		Media
New Canaan Patch	hcobin@snet.net			Media
Darien Times, The	editor@darientimes.com			Media
Darien Patch	johnd@patch.com			Media
Fairfield County Weekly	nkeppler@fairfieldweekly.com			Media
Greenwich Citizen	gcitizen@bcnnew.com.	(203) 625-4468	(203) 624-4472	Media
Greenwich Post		(203) 861-9191	(203) 861-0023	Media
Patch.com	david.gurliacci@patch.com			Media
WICC Radio	curt.hansen@cumulus.com	(203) 366-6000 x336	(203) 384-0600	Media
Patch.com	barbara.heins@patch.com			Media
Hour, The	news@thehour.com	(203) 354-1115		Media
Danbury News Times	nhutson@newstimes.com	(203) 731-3339	(203) 792-8730	Media
Westport News	klang@bcnnew.com	(203) 222-6775	(203) 454-2765	Media
Stamford Advocate	jonathan.lucas@scni.com	+1 (203) 964-2268	(203) 964-2345	Media
Westport Patch	liz@patch.com	(203) 280-3229		Media
NBC 30 News		(860) 521-3030		Media
News 12	news12ct@news12.com	(203) 849-1321	(203) 849-1327	Media
WELI/WKCI Radio 960 Am	nhanews@clearchannel.com	(203) 281-9600		Media
The Norwalk Citizen	nrivard@bcnnew.com	(203) 655-7476		Media
WGCH AM 1490	tony.savino@wgch.com	(203) 869-8850	(203) 869-3636	Media
CT Post	jschwing@ctpost.com	(203) 330-6248	(203) 367-8158	Media
Greenwich Patch	cecelia@patch.com			Media
Wilton Villager, The	jsoulliere@thehour.com	(203) 354-1065		Media
Darien News Review and New Canaan News	avarese@bcnnew.com	(203) 972-4400	(203) 972-4404	Media

Weston Forum/Redding Pilot/Ridgefield	editor@thewestonforum.com	(203) 438-6544	(203) 438-3395	Media
Westport Minute Man	editor@westportminuteman.com	(203) 226-8877		Media
Westport News & Fairfield Citizen News		Byr(203) 255-4561	(203) 384-1158	Media
Westport Now	editor@westportnow.com			Media
Wilton Bulletin	newsroom@wiltonbulletin.com	(203) 762-3866		Media
WTNH Channel 8	news8@wtnh.com	(203) 784-8888	(203) 789-2010	Media
WCUM 1450 AM		203-335-1450		Spanish_Media
WFAR 93.3 FM		203-748-0001		Spanish_Media
El Sol	<a href="mailto:info@elsolnews.com">info@elsolnews.com</a>	203-323-8400	203-323-8500	Spanish_Media
Tribuna ct	<a href="mailto:tribunact@tribunact.com">tribunact@tribunact.com</a>	(203) 730.0457		Spanish_Media
La Voz		(203) 674-6793		Spanish_Media
*Please note this is the primary contact list used for distributing information the media.				

**FOR IMMEDIATE RELEASE – March 9, 2011**

CONTACT: Floyd Lapp, Executive Director  
South Western Regional Planning Agency  
(203) 316-5190

## **South Western Region Metropolitan Planning Organization March 24, 2011 Meeting**

The South Western Region Metropolitan Planning Organization (SWRMPO) will meet on March 24, 2011 to discuss transportation policy, programs and projects that concern the South Western Region. This meeting agenda includes action items on the Air Quality Conformity Statements for Ozone and Particulates, the FFY2010-2013 Transportation Improvement Program (TIP), and the South Western Region Draft Long Range Transportation Plan 2011-2040 and Air Quality Conformity Review. Approval will be requested to release the Draft Long Range Transportation Plan and Air Quality Conformity Review to the public for review and comment.

The meeting will be held at the Norwalk Transit District located at 275 Wilson Avenue, Norwalk, CT 06854 and will begin promptly at 8:15 a.m. The meeting agenda is available at <http://www.swrpa.org/Default.aspx?About=123>, one-week prior to the meeting.

The SWRMPO is comprised of the chief elected officials of the South Western Region's eight towns of Darien, Greenwich, New Canaan, Norwalk, Stamford, Weston, Westport and Wilton, and the directors of the Region's transit districts. As mandated by federal regulations, the SWRMPO is responsible for transportation policy development, planning, and programming of federal transportation funding for the region.

The SWRMPO meets the on the fourth Thursday of every month, usually at the Norwalk Transit District. The public is invited to participate.

For further information, directions, and to view the agenda for the upcoming meeting please visit the SWRPA website at [www.swrpa.org](http://www.swrpa.org) or at (203) 316-5190.

Meeting facilities are handicapped-accessible. For special accommodations, persons wishing to attend the MPO meeting and require an interpreter may make arrangements by contacting SWRPA at (203) 316-5190 (voice only), at least five working days prior to the date of the meeting.

*Para organizar especial de alojamiento o los servicios de traducción en contacto con SWRPA al menos cinco (5) días antes de la reunion al (203) 316-5190 (sólo voz)*

###

## **Attachment C**

*South Western Region Transportation Planning Program's Title VI Policy and Complaint Procedure*; issued June 1, 2005 and revised January 15, 2010.

*South Western Region Strategy for Addressing Limited English Proficiency*; issued May 12, 2011.

*The 2009 Public Participation Plan for the South Western Region Metropolitan Planning Organization*; issued December 4, 1997 and revised May 28, 2009.

MPO Operating Procedures; issued June 23, 1981 and revised June 26, 2006.

MPO Planning Roles and Responsibilities; revised June 30, 2008.

*South Western Region Affirmative Action Policy Plan and Policy Statement*; updated January 18, 2011

**Transportation Planning Program**  
**Policy: Handling Inquiries and Complaints Related to Title VI and ADA**  
**Compliance**

The South Western Regional Planning Agency (SWRPA) as the transportation planning agency for the South Western Region Metropolitan Planning Organization (SWRMPO), its member municipalities and its transit districts strictly adhere to local, state and federal laws, regulations and executive orders prohibiting discrimination on the basis of race, religion, ethnicity, gender, disability and other illegal factors.

This policy of non-discrimination is evident in SWRPA's employment and personnel practices, its public involvement process, and the locations selected for its meetings. It is also SWRPA's policy to arrange for special accommodations, upon request, for stakeholders with physical impairments. SWRPA also is working with local community organizations to develop resources to help it better meet the needs of stakeholders with limited English proficiency and/or literacy skills.

**Submission of Inquiries**

Inquiries about SWRPA's non-discrimination policies and practices, and compliance with Title VI of the Civil Rights Act of 1964 (Title VI) and the Americans with Disabilities Act of 1990 (ADA) may be directed to:

Susan Prosi  
Senior Regional Transportation Coordinator  
SWRPA  
888 Washington Boulevard, 3<sup>rd</sup> Floor  
Stamford, CT 06901  
  
(203) 316-5190  
(203) 316-4995 facsimile  
[Prosi@swrpa.org](mailto:Prosi@swrpa.org)

**Requests for Special Accommodations**

Requests for special accommodations for any program or meeting of SWRPA or the SWRMPO should be made at least five (5) days in advance of the event date in order to ensure adequate time for such arrangements to be made. Such requests may be directed to:

Patricia Payne  
Office and Finance Manager  
SWRPA  
888 Washington Boulevard, 3<sup>rd</sup> Floor  
Stamford, CT 06901  
  
(203) 316-5190  
(203) 316-4995 facsimile  
[Payne@swrpa.org](mailto:Payne@swrpa.org)



**Filing a Complaint**

Complaints against how SWRPA manages its Title VI and ADA compliance programs must be submitted in writing and may be directed to:

Floyd Lapp, FAICP  
Executive Director  
SWRPA  
888 Washington Boulevard, 3<sup>rd</sup> Floor  
Stamford, CT 06901

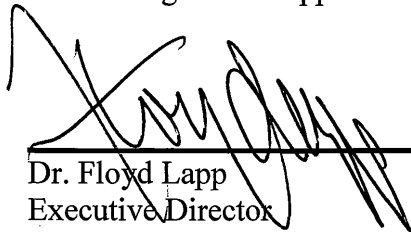
(203) 316-5190  
(203) 316-4995 facsimile  
[lapp@swrpa.org](mailto:lapp@swrpa.org)

All complaints will be reviewed by the Executive Director. Receipt of complaints will be acknowledged by e-mail, fax or letter within 24 hours of receipt. A written response will be issued within 10 business days. The Executive Director reserves the right to review the complaint with SWRPA staff, members of the SWRMPO, and members of the SWRPA Board of Directors, as necessary and appropriate.

In the event that the complaint references actions or situations beyond the control of SWRPA, the Executive Director will inform the complainant of this fact and, to the best of his knowledge, provide contact information for the organization that has jurisdiction over such actions or situations to the complainant.

**Opportunities for Appeal**

In the event that a complainant is not satisfied with the response received from SWRPA, the complainant will be encouraged to contact SWRPA's Field Coordinator at the Connecticut Department of Transportation (CTDOT) or the Connecticut Commission on Human Rights and Opportunities (CHRO) to request an additional review and assistance.



Dr. Floyd Lapp  
Executive Director

**Issued June 1, 2005**  
**Revised January 15, 2010**

**South Western Region**  
**Strategy for Addressing Limited English Proficiency**  
2011

The South Western Region (SWR) is committed to ensuring that all transportation planning, policies, and programs are equitable. The SWR has implemented a number of practices into its regular public involvement activities and continues to work to assure that limited proficiency in English is not an obstacle for participation in or benefits from the Region's transportation planning programs. The SWR has incorporated practices to affirm federal Title VI<sup>1</sup> and Limited English Proficiency (LEP)<sup>2</sup> policies by:

- Promoting the full and fair participation of all affected populations in transportation decision making;
- Preventing the denial, reduction or delay in benefits related to programs and activities that benefit minority populations or low-income populations;
- Ensuring that the level and quality of transportation service is provided without regard to race, color or national origin;
- Identifying and addressing, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority, linguistically isolated, and low-income populations; and,
- Ensuring meaningful access to programs and activities by LEP persons.

As part of the Region's Environmental Justice Annual Assessment, demographic profiles for the Region are developed, using the smallest geography for which reliable and accurate data are available for. Language barriers are assessed using Census data on linguistic isolation. According to the U.S. Census Bureau, a linguistically isolated household is defined as "one in which no member 14 years old and over (1) speaks only English or (2) speaks a non-English language and speaks English 'very well.' In other words, all members 14 years old and over have at least some difficulty with English."<sup>3</sup>

According to the 2009 American Community Survey, 9,549 out of 134,323 households in the Region, or 7.1%, were considered to be linguistically isolated.<sup>4</sup> Among all linguistically isolated households in the Region, 54% spoke Spanish, 38% spoke other Indo-European languages, 8% spoke Asian and Pacific Island languages and < 1% spoke other languages. The 2009 data identifies Spanish as the primary LEP – linguistic isolation language and continues the Region's focus on and the primary LEP focus on the Spanish speaking community.

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<sup>1</sup> Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d). <http://www.justice.gov/crt/cor/coord/titlevistat.php>

<sup>2</sup> Executive Order #13166 of August 11, 2000, "Improving Access to Services for Persons with Limited English Proficiency" <http://www.justice.gov/crt/cor/Pubs/eolep.pdf>

<sup>3</sup> US Census Bureau, *2000 Census of Population and Housing, Summary File 3.*

<sup>4</sup> U.S. Census Bureau, *2005-2009 American Community Survey 5-Year Estimates.* <http://www.census.gov/acs/www/>

The SWR promotes full and fair participation by all persons in the transportation decision-making process. To assure people who are not proficient in English can effectively participate in the planning process the SWR employs the following mechanisms.

- SWRPA annually assesses the region's transportation planning program for compliance with applicable regulations to assure that the distribution of benefits and burdens is evenly distributed across the demographic area served. As such, SWRPA prepares:
  - An Environmental Justice assessment annually and with each major revision to the region's Long Range Transportation Plan (LRTP), and the Transportation Improvement Program (TIP), which includes and assessment of project that serve or affect LEP persons. The *South Western Region Environmental Justice Annual Assessment* is posted online and includes strategies to reach out to citizens, with a focus on the Spanish speaking community and linguistically isolated households.
  - Environmental Justice Assessments are prepared by sponsors of projects that are required to undertake Environmental Impact Statements or Environmental Assessments (e.g. The City of Stamford for the Stamford Urban Transitway).
  - An Annual Assessment and Compliance Summary Report for Title VI and Limited English Proficiency, which is posted online.
  - A summary of activities supporting LEP, Title VI and Environmental Justice compliance are included in quarterly reports to the US Department of Transportation and the Connecticut Department of Transportation.
- The SWRMPO maintains a Public Participation Plan, which ensures that information is easily accessible and understandable to all members of the community. The *2009 Public Participation Plan for the South Western Metropolitan Planning Organization* identifies a number of recommendations aimed at involving communities of concern in the transportation decision-making process and enhancing access to information for individuals, including those with LEP.
  - Public involvement practices are evaluated annually and modified as needed or as new public involvement strategies are identified.
  - A summary report of public involvement activities is completed annually and posted online.
  - Visualization techniques area employed wherever possible.
- Project specific public involvement plans are developed to help tailor outreach efforts to the needs of individual communities. For projects affecting an area with a population identified as having households with limited English proficiency, public involvement plans will include specific strategies to provide informational materials and notices in both English and Spanish (or the appropriate non-English language). Additionally, the demographic profile of project study areas are evaluated when developing the project scope of work and the demand for interpreters are considered.
- A translation link is maintained on the SWRPA website, which allows the website and associated documents to be viewed in a number of different languages.

- All legal notices, media releases, meeting notices, agendas, minutes, project information, presentations, reports and summaries; and all major planning documents are posted online
- A data base with contact information for Spanish language media is maintained, with media releases issued as necessary.
- Information on how to arrange for special accommodations is included with all media releases issued by the SWRMPO; and include on meeting agendas and the SWRMPO website in both English and Spanish:

*To arrange for special accommodations or translation services contact  
SWRPA at least five (5) days prior to the meeting at (203) 316-5190  
(voice only)*

*Para organizar especial de alojamiento o los servicios de traducción en  
contacto con SWRPA al menos cinco (5) días antes de la reunion al  
(203) 316-5190 (sólo voz)*

- Work with members of the traditionally underserved community and their leaders, including faith and community based organizations, elderly groups, disabled advocacy groups, etc.
- Continue to assist the Region's transit operators with technical assistance through mapping; geographic analysis; Title VI, LEP and EJ assessments; and demographic analysis within the service areas.
- The SWRMPO has posted all Title VI, LEP and Environmental Justice policies and assessments online.

### Filing a Complaint

Complaints against SWRPA regarding its Title VI and LEP compliance programs must be submitted in writing and should be directed to:

Floyd Lapp, FAICP  
Executive Director, SWRPA  
888 Washington Boulevard, 3<sup>rd</sup> Floor  
Stamford, CT 06901


(203) 316-5190  
(203) 316-4995 facsimile  
[lapp@swrpa.org](mailto:lapp@swrpa.org)

All complaints will be reviewed by the Executive Director. Receipt of complaints will be acknowledged by e-mail, fax or letter within 24 hours of receipt. A written response will be issued within 10 business days. The Executive Director reserves the right to review the complaint with SWRPA staff, members of the SWRMPO, and members of the SWRPA Board of Directors, as necessary and appropriate.

In the event that the complaint references actions or situations beyond the control of SWRPA, the Executive Director will inform the complainant of this fact and, to the best of his knowledge, provide contact information for the organization that has jurisdiction over such actions or situations to the complainant.

Opportunities for Appeal

In the event that a complainant is not satisfied with the response received from SWRPA, the complainant will be encouraged to contact SWRPA's Field Coordinator at the Connecticut Department of Transportation (CTDOT) or the Connecticut Commission on Human Rights and Opportunities (CHRO) to request an additional review and assistance.

  
\_\_\_\_\_  
Dr. Floyd Lapp  
Executive Director

Issued: May 12, 2011

# *2009 Public Participation Plan*



## *for the South Western Region Metropolitan Planning Organization*

Endorsed by:  
South Western Region  
Metropolitan Planning Organization  
May 28, 2009

Prepared by:  
South Western Regional Planning Agency  
888 Washington Blvd. 3<sup>rd</sup> Floor  
Stamford, CT 06901  
203.316.5190

# *2009 Public Participation Plan for the South Western Regional Planning Organization*

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## Introduction

The South Western Region Metropolitan Planning Organization (SWRMPO) is responsible for the transportation policy development, planning, and programming for the 8 communities in the region:

- ◆ Darien,
- ◆ Greenwich,
- ◆ New Canaan,
- ◆ Norwalk,
- ◆ Stamford,
- ◆ Weston,
- ◆ Westport



Regulations guiding the public participation process for the SWRMPO include:

- ◆ Federal regulation 23 C.F.R. §450.316 requires new participation techniques be included in public participation plans, such as the employment of visualization techniques, more information available online, and involvement of the public in the creation of public participation plans.
- ◆ Executive Order #12898 of February 11, 1994, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.”
- ◆ Executive Order #13166 of August 11, 2000, “Improving Access to Services for Persons with Limited English Proficiency”

In addition to addressing federal mandates, the SWRMPO will continue to update its policies, as it has done in the past, in order to conform to new regulations, utilize changing technology and trends, and maintain effective public participation practices.

## Overview

The Public Participation Plan is the SWRMPO’s official policy on involving the public in the transportation planning process. The Public Participation Plan provides an overview of the objectives for public involvement, and the activities of the MPO and the Transportation Technical Advisory Group (TTAG). The Public Participation Plan also outlines the MPO’s adoption and amendment processes for transportation plans, projects, and tasks; comment periods; opportunities for public participation; noticing practices; techniques to address regulations guiding the public participation process, such as environmental justice; plan evaluation; and strategies for public participation.

A table detailing specific strategies used to engage the public in the planning process is included. Appendices providing an evaluation of legal noticing methods, a current list of media resources, and comments received during the public review are also included as part of the plan.

## Objectives for Public Participation

- ◆ **Educate and inform** the public about transportation planning, projects, and issues within their communities and the region.
- ◆ **Involve the public** in the transportation planning process.
- ◆ Ensure that **information is easily accessible** to all interested parties in the community.
- ◆ **Improve the decision making process** to include the interest/needs of stakeholders through informed consent.
- ◆ **Continue to evaluate and improve** public participation strategies

## MPO Major Activities – TIP, LRTP, UPWP

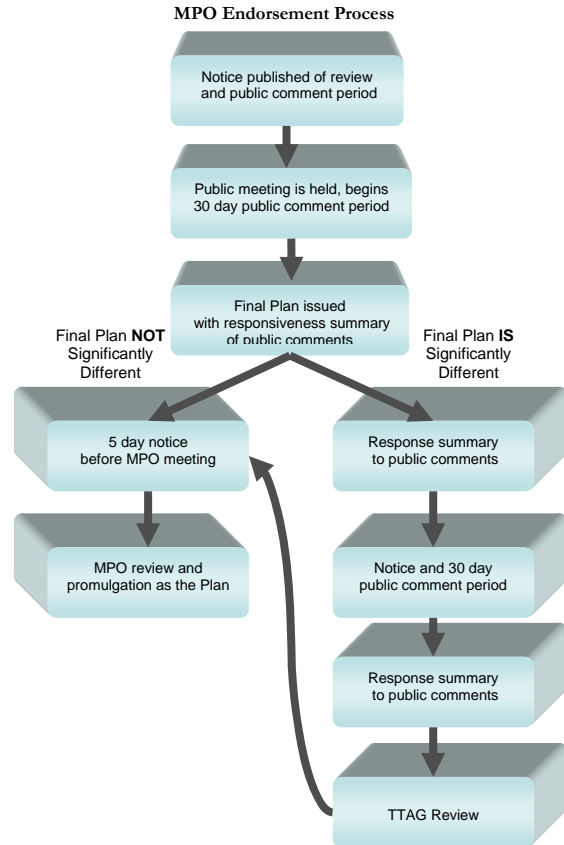
The SWRMPO is responsible for three major transportation planning programs, the Long Range Transportation Plan (LRTP), the Transportation Improvement Program (TIP), and the Unified Planning Work Program (UPWP). The SWRMPO is also responsible for the creation of the Public Participation Plan and conducting special transportation studies.

**TIP** – The Transportation Improvement Program is a list of all federally funded projects in the region, and all capacity projects whether federally funded or not.

**LRTP** – The Long Range Transportation Plan is a 20-30 year look into the future. The LRTP is updated every few years and seeks to envision long term transportation needs for the region.

### The Process - TIP and LRTP (Implementation and Update)

1. Notice will be given at the beginning of the 30 day review period that the draft is available for public review at the local libraries (listed below), at SWRPA offices (888 Washington Blvd. 3<sup>rd</sup> Floor, Stamford, CT 06901), and online at [www.swrpa.org](http://www.swrpa.org).
2. A public meeting is held prior to endorsement of the TIP or LRTP.
3. The final TIP/LRTP is issued, including a responsiveness summary on public comments received.
4. If the final TIP/LRTP is **NOT** significantly different than the draft, a 5 days notice is given prior to the MPO meeting for endorsement of the TIP/LRTP.
5. If the final TIP/LRTP **IS** significantly different from the draft, the document is revised. A notice is given for a 30 day comment period of the revised TIP/LRTP. Next a response summary to public comments is prepared, and TTAG reviews the revised draft TIP/LRTP.
6. Finally, 5 days notice is given prior to the MPO meeting for endorsement of the TIP/LRTP. The final document is posted online and a legal notice announcing endorsement is published.



**UPWP** – The unified planning work program is an annual listing of the MPO’s planning work projects to be completed.

- ◆ The Draft UPWP is reviewed by TTAG.
- ◆ Opportunities for public comment are provided at scheduled TTAG and MPO meetings prior to endorsement.
- ◆ The endorsed UPWP is posted online at [www.swrpa.org](http://www.swrpa.org).

Draft copies SWRMPO plans are available online at [www.swrpa.org](http://www.swrpa.org) and at local libraries:

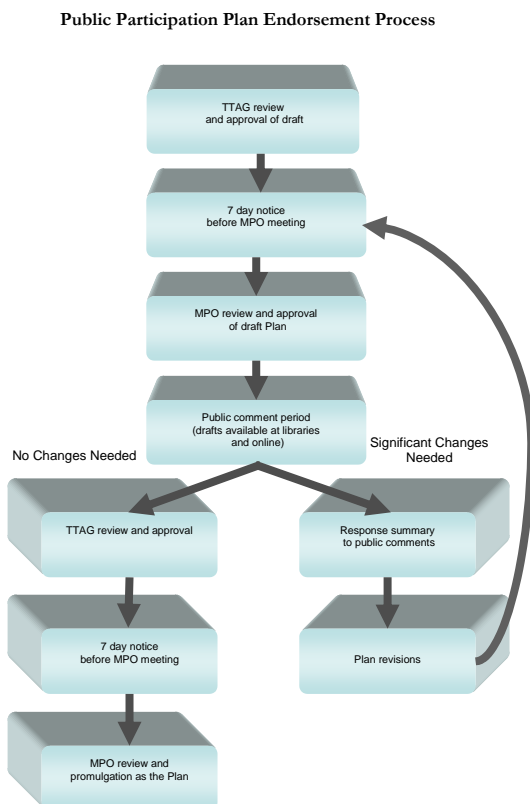
<b>Darien Library</b>	1441 Post Rd. Darien, CT 06820
<b>Greenwich Library</b>	101 W. Putnam Ave. Greenwich, CT 06830
<b>New Canaan Library</b>	151 Main St. New Canaan, CT 06840
<b>Norwalk Public Library</b>	1 Belden Ave. Norwalk, CT 06850
<b>Ferguson Library (Stamford)</b>	One Public Library Plaza Stamford, CT 06904
<b>Weston Public Library</b>	56 Norfield Rd. Weston, CT 06883
<b>Westport Public Library</b>	20 Jesup Rd. Westport, CT 06880
<b>Wilton Library Assoc.</b>	137 Old Ridgefield Rd. Wilton, CT 06897

## 2009 Public Participation Plan for the SWRMPO

**Public Participation Plan** – the SWRMPO’s Public Participation Plan outlines the methods for public participation and outreach strategies for MPO programs and activities.

### ***The Process - Public Participation Plan (Implementation and Update)***

1. DOT review and comment, followed by TTAG review and recommendation of approval, of the draft Public Participation Plan.
2. Notice issued 7 days before MPO meeting where it will be reviewed and approved as the draft Public Participation Plan.
3. The 45 day public comment period begins, with drafts of the plan available at local libraries, SWRPA offices and online ([www.swrpa.org](http://www.swrpa.org)).
4. If the final plan is **NOT** significantly different then it is forwarded for TTAG review and approval. A notice is provided seven days before the MPO meeting, where the plan is reviewed and promulgated as the official Public Participation Plan. The final document is posted online and a legal notice announcing endorsement is published.
5. If the final plan **IS** significantly different from the draft plan a response summary to public comments is prepared, the plan is revised and the process is repeated.



**Special Studies and Projects** - As needed the SWRMPO conducts or sponsors planning studies to address a variety of transportation issues or concerns.

For studies, projects, and certain tasks conducted under the metropolitan transportation planning program, public participation opportunities may include:

- ◆ The **need and scope for public involvement** will be determined for each project, study and UPWP tasks prior to initiation.
- ◆ When necessary a public involvement task will be included as part of the scope of work and a **Public Involvement Plan** will be created.
- ◆ A **summary of public involvement** will also be prepared as part of the final report.
- ◆ A **webpage** on the SWRPA website will be developed and will provide information on the project, including scope, schedule, project manager, how to get involved, how to provide comments, and links to resources related to the project.
- ◆ **Media releases** will be issued on the project to keep the public informed of study activities and opportunities for involvement and comment.
- ◆ An **interested parties list** will be established to identify persons and organizations interested in being informed of project activities.
- ◆ Study **progress reports and presentations** will be given at TTAG and MPO meetings.
- ◆ Methods for **public comment** on draft final documents will be provided and will be tailored to meet the needs and objectives for specific studies.
- ◆ An **executive summary** of the study will be prepared in English and in Spanish.\*
- ◆ **Visual presentations** (i.e. Power Point) will be prepared for key study deliverables and presentations will be posted on the study web site.\*

\*indicates future public participation goals

### Comment periods

Drafts of all major transportation programs, studies, and tasks will be made available for public comment and review. Comments must be provided in writing. Comments can be sent by mail to:

**SWRPA**  
**888 Washington Blvd. Suite 300**  
**Stamford, CT 06901**

or electronically to the identified SWRPA staff person.

All comments received will be documented and be handled according to SWRMPO policy. The public review and comment period is typically:

- ◆ 30 days for a new TIP or major amendment
- ◆ 30 days for the LRTP
- ◆ 45 days for the Public Participation Plan

### Opportunities for Public Participation

One of the easiest ways for the public to become involved in the transportation planning process is through attendance at MPO or TTAG meetings. A schedule of all meetings is posted on the SWRPA website and an item entitled “public participation,” where members of the public can be heard, is included in the agenda for each meeting.

MPO and specific project information will be available on SWRPA’s website, where users will also be able to subscribe to project specific email lists. A project specific public involvement plan will be developed for special studies conducted by the SWRMPO, which will identify means of public participation. A template will be developed as to ensure all required and recommended elements are included in project specific plans. The SWRMPO meetings are held in ADA compliant buildings and in locations accessible to public transit. Meetings schedules and their agendas are posted on the SWRMPO website at [www.swrpa.org](http://www.swrpa.org).

### Noticing

The annual MPO and TTAG meeting schedules are sent to the Secretary of State and Town Clerks of the South Western Region municipalities each December and a legal notice is published at the beginning of each year with the dates of scheduled meetings. The Secretary of State and Town Clerks are also notified of additional meetings or schedule changes that may occur during the year.

As shown in Appendix A, the \$6,400 spent on legal notices for 30 SWRMPO meetings between 2005 and 2008 did not generate any public participation. In order to reach a larger number of the MPO’s constituents and to be fiscally responsible, media releases (public service announcements or PSAs) will be used to convey information instead of the traditional legal notices, which have been used in the past.

A standard format will be developed and used to advise the media, and the public, of MPO and TTAG activities. Notices will continue to be posted on SWRPA’s website ([www.swrpa.org](http://www.swrpa.org)). SWRMPO will also explore other methods of outreach, such as the use of public access community calendars and new noticing formats and venues. Specific noticing techniques are detailed below as part of the Strategies for Public Participation table beginning on page 7.

#### Types of Transportation Program Meetings

<u>SWRMPO</u>	<u>TTAG</u>	<u>Public Information Sessions</u>
<ul style="list-style-type: none"> <li>◆ Policy board. comprised of chief elected officials and transit district representatives</li> <li>◆ Held once per month.</li> <li>◆ This body sets the official policy and passes action items.</li> <li>◆ Open to the public</li> </ul>	<ul style="list-style-type: none"> <li>◆ Members of this body, typically transportation and planning experts, provide technical advice to the SWRMPO.</li> <li>◆ Generally held once per month.</li> <li>◆ Open to the public</li> </ul>	<ul style="list-style-type: none"> <li>◆ Held as needed</li> <li>◆ Provide information related to specific projects.</li> <li>◆ Convey project specific information, via presentations and open houses.</li> <li>◆ Project staff is available to provide additional information and to answer any questions raised.</li> <li>◆ Open to the Public</li> </ul>



### ***Online***

In order to increase accessibility to information, the SWRMPO will continue to make information available online. Notices, documents (including this Public Participation Plan) and other information will be available at [www.swrpa.org](http://www.swrpa.org). Additionally, interested parties will have the option to join the SWRMPO contact list and receive meeting and project information via e-mail.

As projects and other resources are completed they will be made available online and may include: a glossary of common transportation terms, a list of commonly used acronyms, a basic guide to metropolitan planning organizations, and a description of MPO and TTAG meetings. Documents such as an executive summary of the Public Participation Plan and the description of MPO and TTAG meetings will be made available in Spanish to engage members of the community with limited English proficiency. Additional resources that will be made available on line are indicated below as part of the Strategies for Public Participation table beginning on page 7.

### ***Visualization Techniques***

The TIP, LRTP and Public Participation Plan have been developed using user-friendly formats, which include flow charts and formatting to ease comprehension.

Additionally, the SWRMPO will seek to enhance visualization at meetings through various methods, such as maps, charts, graphs, and simulations. The SWRMPO will also explore broadcasting meetings on local cable stations and websites. Specific techniques are detailed below as part of the Strategies for Public Participation table beginning on page 7.

### ***Environmental Justice (EJ)***

Executive order #12898, which addresses Environmental Justice in low-income and minority populations, was in effect for the development of the 1997 Public Participation Plan. As such, many of the requirements of the Executive Order have been addressed. Since the mid 1990's an Environmental Justice report has been created annually to evaluate the TIP and LRTP.<sup>1</sup>

The SWRMPO will continue to identify, reach out to, and include communities of concern in the region through a variety of techniques, including: creative noticing techniques and venues, developing working relationships with community leaders, and maintaining the current environmental justice reports. Specific techniques to engage communities of concern are indicated as part of the Strategies for Public Participation table beginning on page 7.

### ***Limited English Proficiency (LEP)***

Some residents of the South Western Region are native speakers of a language other than English and may have limited English proficiency. Spanish has been identified as the second most common language spoken in the region.<sup>1</sup> The current Environmental Justice report has identified strategies to reach out to native Spanish speakers, which include working with faith based organizations to reach a broader audience, keeping a current database of Spanish language media, and offering executive summaries in Spanish. The SWRMPO has incorporated many of these strategies into the Public Participation Plan. Specific techniques to engage residents with limited English proficiency is included as part of the Strategies for Public Participation table beginning on page 7.

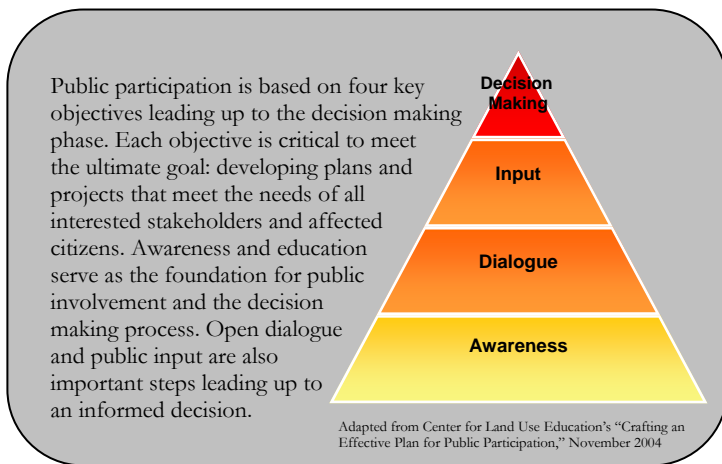
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<sup>1</sup> South Western Regional Planning Agency (SWRPA). 2007. South Western Region Environmental Justice Annual Assessment, July 2007

## Plan Evaluation

In an effort to ensure the Public Participation Plan is effective, and compliant with federal and state regulations the plan will be evaluated annually. An evaluation survey will be developed and handed out at MPO, TTAG, and public meetings to assess the effectiveness of noticing methods used and the techniques used to convey information. A framework will also be developed for internal evaluation of the Public Participation Plan and the recommended strategies. Amendments to the plan will be made as necessary, to ensure the strategies for public involvement remain effective.

In addition, reports on all public participation activities conducted will also be included in transportation planning quarterly and annual reports. The reports will include the status of strategies recommended in the Public Participation Plan, and project specific Public Involvement Plans that have been developed. The reports will help to evaluate progress towards meeting the objectives of the plan and engaging the public in the transportation decision making process.



## Strategies for Public Participation

A variety of strategies have been identified to facilitate public involvement in the transportation planning process.

### Goals for 2008/2009

- ◆ Complete Public Participation Plan evaluation.
- ◆ Explore the use of diverse media outlets.
- ◆ Explore broadcasting MPO meeting on-line and on local cable stations.
- ◆ Promote the use of visualization techniques.
- ◆ Add to interested parties contact list.
- ◆ Consider recommendations from the Environmental Justice Report.
- ◆ Continue to evaluate and improve methods to engage all members of the community.
- ◆ Provide a list of acronyms and glossary of transportation terms.
- ◆ Offer a guide to metropolitan transportation planning organizations and a guide to public participation.
- ◆ Expand and update notice practices to increase effectiveness.
- ◆ Offer Spanish translations.
- ◆ Engage the public in the creation of the Public Participation Plan.

### Future Year Goals and Ongoing Practices

- ◆ Ensure project specific public involvement.
- ◆ Offer translation services when appropriate.
- ◆ Increase notice availability.
- ◆ Continue meeting accessibility practices.
- ◆ Annual evaluation and update of the Public Participation Plan.

The Strategies for Public Participation table outlines specific strategies that will be used by the SWRMPO to effectively engage the community, and encourage public participation. The table will serve as a tool to evaluate the Public Participation Plan, and as a benchmark to measure the success of the plan. The identified strategies will also act as a platform from which the plan may evolve, as new strategies are identified and implemented strategies are evaluated.

The following table provides descriptions of the tasks, the objectives that each strategy fulfills the target implementation timeline, and the status of each item.

**Strategies for Public Participation<sup>1</sup>**

Strategy	Description	Implementation Timeline	Objective	Online	Status
Public Participation Plan Evaluation <sup>1</sup>	Develop a framework for evaluation of the plan and its recommendations	2008/09	Continue to improve Public Participation (PP), Improve the decision making process, Involve the public		In Progress
	Develop and provide an evaluation survey for all public meetings and information sessions to evaluate the effectiveness of the Plan	2009/On Going		√	In Progress
	Conduct annual reviews of the Plan for compliance and effectiveness. Continue to be sensitive to needs of stakeholders and make enhancements without necessarily changing official policy each time.	2008/09 and annually thereafter			In Progress
Evaluation and Update the Public Participation Plan <sup>1,2,3</sup>	Modify the layout of meeting and amendment procedures to make everything more user-friendly. Include flow-charts and other visualizations to ease comprehension and make the Plan available online.	2008/09	Continue to improve PP, Improve the decision making process, Involve the public	√	Standard Practice
	Continue to identify and update methods to involve the public and communities of concern, to enhance comprehension and accessibility to transportation planning programs and information.	On Going			In Progress
Explore the Use of Diverse Media Outlets <sup>3</sup>	Research opportunities to engage the public through local access television, public service announcements, radio, mass media, and other local publications.	2008/09	Involve the public, Easily accessible information, Educate and inform, Continue to improve PP		In Progress
	Explore options for engaging communities of concern through Spanish language media.	2009/10			In Progress
	Investigate the feasibility of adding a blog.	2009/10		√	Future Task

<sup>1</sup> Federal regulation 23 C.F.R. §450.316 – noticing, visualization techniques, online information and involvement of the public in the creation of the PPP

<sup>2</sup> Executive Order #12898 - Environmental Justice

<sup>3</sup> Executive Order #13166 - limited English proficiency



**Strategies for Public Participation**<sup>1</sup>

Strategy	Description	Implementation Timeline	Objective	Online	Status
Promote the Use of Visualization Techniques <sup>1,2,3</sup>	Enhance visualization at meetings through various methods such as electronic presentations (i.e. Microsoft Power Point), maps, posters, charts, graphs, and simulations, where appropriate. Provide a link to relevant graphics on the MPO website.	2008/09	Educate and inform, Easily accessible information, Involve the public, Improve the decision making process, Continue to improve PP	√	In Progress
	Explore the effectiveness of broadcasting meetings and presentations over public access stations.	2008/09			In Progress
	Post relevant presentations online.	2008/09		√	In Progress
	Employ visualization tools in the development of project brochures, notices, and other publications.	2009/10			In Progress
	Explore recording and broadcasting MPO meetings on local websites and public access stations.	2009/10		√	In Progress
	Research the use of interactive mapping tools (i.e. Google Earth) to display projects included in the TIP. Also considered including other local transportation projects.	2009/10		√	In Progress
Add to the Interested Parties Contact List <sup>2</sup>	Give all meeting attendees and visitors to the MPO website the option to join the contact list.	2009/10	Continue to improve PP, Involve the public, Improve the decision making process,	√	Future Task
	Continue to develop the contact list through building on other program contacts such as LOCHSTP, housing and environment outreach, etc.	2008/09			On Going
	Compile a list of contacts of those traditionally underserved (from future outreach efforts) and add them to the database.	2008/09			On Going

<sup>1</sup> Federal regulation 23 C.F.R. §450.316 – noticing, visualization techniques, online information and involvement of the public in the creation of the PPP

<sup>2</sup> Executive Order #12898 - Environmental Justice

<sup>3</sup> Executive Order #13166 - limited English proficiency

**Strategies for Public Participation**<sup>1</sup>

Strategy	Description	Implementation Timeline	Objective	Online	Status
Consider Recommendations From the Environmental Justice Report <sup>2</sup>	Include recommendations from the EJ report prepared for the TIP & LRTP in the Public Participation Plan.	2008/09	Improve the decision making process		Standard Practice
Explore Methods to Engage All Members of the Community <sup>2,3</sup>	Research options for engaging communities of concern such as through Spanish radio and print media.	2009/10	Involve the public, Educate and inform, Improve the decision making process, Continue to improve PP		In Progress
	Explore developing working relationships with members of the traditionally underserved community and their leaders, including faith and community based organizations, elderly groups, disabled advocacy groups, etc. Consider meeting with them on topics of concern in their neighborhood / community.	2008/09			In Progress
	Partner with local community groups and organizations to co-host input meetings and workshops on transportation issues, opportunities, projects and programs.	2009/10			Future Task
Integrate More Online Resources <sup>1</sup>	See "Online" column for items that contribute to this requirement.	2008/09	Easily accessible information	√	In Progress
Expand Notice Practices to Increase Effectiveness <sup>1,2</sup>	Explore the effectiveness of creative noticing methods (i.e. bill stuffers, project brochures, information booths etc.) and their appropriateness for MPO projects and studies.	2010/11	Continue to improve PP, Involve the public, Easily accessible information		Future Task
	Explore posting notices at new places such as transit stops, and local bulletin boards. Investigate new formats such as posters or more eye-catching notices.	2008/09			In Progress
	Interested parties will be able to join a list where "e-mail blasts" will be sent out with pertinent project information.	2009/10		√	In Progress

<sup>1</sup> Federal regulation 23 C.F.R. §450.316 – noticing, visualization techniques, online information and involvement of the public in the creation of the PPP

<sup>2</sup> Executive Order #12898 - Environmental Justice

<sup>3</sup> Executive Order #13166 - limited English proficiency

**Strategies for Public Participation**<sup>1</sup>

<b>Strategy</b>	<b>Description</b>	<b>Implementation Timeline</b>	<b>Objective</b>	<b>Online</b>	<b>Status</b>
Update Notice Methods <sup>1</sup>	Change the number of days before meetings that notice will be provided to allow incorporation of as many ConnDOT and other MPO action items to be added as late as possible.	2008/09	Improve the decision making process		Standard Practice
	Pursuant to the evaluation of current noticing methods (Appendix A) change noticing methods. Namely, use media releases (public service announcements or PSAs) as a more effective and fiscally responsible method of adequately notifying the public.	2008/09	Continue to improve PP		In Progress
Offer Spanish Translations <sup>3</sup>	Provide an executive summary version of the Plan online in Spanish.	2009/10	Educate and inform, Involve the public, Easily accessible information, Improve the decision making process, Continue to improve PP	√	Future Task
	Evaluate the possibility of a Spanish page link from SWRPA's main webpage so that Spanish speakers can navigate the website.	2009/10		√	Future Task
	Provide the executive summary of the 2011 LRTP online in Spanish.	2010/11		√	Future Task
	Assess MPO action items for anticipated significant effects on Spanish speaking LEP communities of concern. When appropriate, translate notices into Spanish.	2008/On Going		√	Standard Practice
Offer a Guide to Public Participation <sup>2,3</sup>	Indicate how the public can get involved, such as where meeting information and plan drafts can be found, in order to improve accessibility to transportation planning programs.	2008/09	Educate and inform, Easily accessible information	√	In Progress
	Publish the guide online in Spanish.	2009/10		√	Future Task

<sup>1</sup> Federal regulation 23 C.F.R. §450.316 – noticing, visualization techniques, online information and involvement of the public in the creation of the PPP

<sup>2</sup> Executive Order #12898 - Environmental Justice

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**Strategies for Public Participation**<sup>1</sup>

<b>Strategy</b>	<b>Description</b>	<b>Implementation Timeline</b>	<b>Objective</b>	<b>Online</b>	<b>Status</b>
Include a Description of the MPO & TTAG on SWRPA's Website <sup>3</sup>	A description of what MPO & TTAG meetings are, when public participation is allowed at them, etc. Provide as a link on the SWRPA website.	2008/09	Educate and inform, Easily accessible information	√	Standard Practice
Provide a List of Acronyms	A list of common acronyms used along with their definition.	2008/09	Educate and inform	√	In Progress
Provide a Glossary	Glossary defining common transportation terms which the general public is unlikely to know offhand.	2009/10	Educate and inform	√	In Progress
Offer a Guide to Metropolitan Transportation Planning Organizations <sup>1,3</sup>	Prepare a general guide to Metropolitan Transportation Planning Organizations and how the SWRMPO operates. Post on SWRPA's website.	2008/09	Educate and inform, Easily accessible information	√	In Progress
	Publish the guide online in Spanish.	2009/10			Future Task
Ensure Project Specific Public Involvement <sup>2,3</sup>	Provide public outreach during special studies and projects through such methods as: creating project specific Public Involvement Plans, a project web page, media releases to keep the public up to date, an executive summary of the study in English and Spanish, and the ongoing use of visualization techniques, as appropriate.	2008/On Going	Educate and inform, Involve the public, Easily accessible information, Improve the decision making process, Continue to improve PP	√	In Progress
	Develop a framework for project specific public participation plans to ensure that appropriate elements are included and to enhance documentation of public involvement.	2008/09			In Progress

<sup>1</sup> Federal regulation 23 C.F.R. §450.316 – noticing, visualization techniques, online information and involvement of the public in the creation of the PPP

<sup>2</sup> Executive Order #12898 - Environmental Justice

<sup>3</sup> Executive Order #13166 - limited English proficiency

**Strategies for Public Participation**<sup>1</sup>

<b>Strategy</b>	<b>Description</b>	<b>Implementation Timeline</b>	<b>Objective</b>	<b>Online</b>	<b>Status</b>
Offer Translation Services When Necessary <sup>3</sup>	Assess needs of LEP communities of concern and make translation accommodations as appropriate.	2010/11	Educate and inform, Easily accessible information		Future Task
Increase Notice Availability	Define in the Plan which newspapers and libraries will have draft plans available and note that draft plans and notices are also available online at the SWRMPO website.	2008/09	Involve the public, Easily accessible information, Continue to improve PP		Standard Practice
Meeting Accessibility <sup>2</sup>	Continue to hold regular MPO meetings at ADA compliant facilities and in locations accessible by public transit.	On Going	Educate and inform, Easily accessible information		Standard Practice
	Develop a list of available public meeting rooms in the region.	2008/2009			In Progress
Update Process for Addressing Public Comments	Develop a system to be used by the SWRMPO to acknowledge and respond to all public comments received and include as part of the plan.	2008/09	Improve the decision making process, Continue to improve PP		Standard Practice
Consult with Local and State Planning Organizations on Transportation Projects	Continue to coordinate and consult with state and local agencies involved in local planning, conservation and land use decisions during the development of projects, plans and other MPO activities.	On Going	Improve the decision making process		Standard Practice
Engage the Public in the Creation of Public Participation Plan <sup>1</sup>	Include public comments received and responses as Appendix C to the plan.	2008/09	Improve the decision making process, Involve the public, Continue to improve PP		In Progress
	Notify interested parties currently on SWRPA's contact list and request their comments.	2008/09			In Progress
General Information and Comments Online	Meeting notices, project information and general information on the MPO will be made available on the SWRPA website.	2009/10	Easily accessible information, Educate and inform, Improve the decision making process, Continue to improve PP	√	In Progress
	A new feature on the SWRPA website will allow general comments to be posted and reviewed.	2009/10		√	In Progress

<sup>1</sup> Federal regulation 23 C.F.R. §450.316 – noticing, visualization techniques, online information and involvement of the public in the creation of the PPP

<sup>2</sup> Executive Order #12898 - Environmental Justice

<sup>3</sup> Executive Order #13166 - limited English proficiency

## Documentation of the Planning Process and Public Comments

In order to incorporate new regulations and update public participation strategies, the 1997 Public Participation Plan has been revised following the process outlined at the beginning of this document. The process began with an extensive review and evaluation of the current public participation plan and research of additional best practices to address deficiencies identified in the 1997 plan. Research brought forth several ideas and potential changes that would enhance the SWRMPO plan, and included the review of over 20 MPO plans, and ConnDOT's 2007 *Draft Public Involvement Guidance Manual*.

A preliminary draft of the 2009 public participation plan was sent out to the Connecticut Department of Transportation (ConnDOT), the Federal Highway Administration (FHWA) and the Federal Transit Authority (FTA) for review and comments in November of 2008. The preliminary draft was modified to incorporate suggestions made by the above reviewers and SWRPA staff to improve the plan's overall usability. The draft 2009 public participation plan was then submitted to TTAG for review on February 12, 2009, and to formulate a recommendation to the SWRMPO regarding readiness to issue the draft Public Participation Plan (PPP) for public review. The 45 day public comment period began March 2, 2009 after the SWRMPO's approval of the draft PPP for review, at the February 23, 2009 meeting.

At the beginning of the public review period a legal notice was published in the *Stamford Advocate* and *Norwalk Hour* announcing the release of the Draft PPP for public review, and the times and locations of public information sessions. The above information was also posted on the website and a press release was sent out to all local news agencies. Three public information sessions were held to provide the public with information on the draft plan and an opportunity to provide comments. Two sessions were held on March 31, and one on April 8. Prior to the final information session a second press release was issued, indicating the time and location of the session, and how the public could provide comments on the draft plan. Additionally two radio interviews were conducted for AM 1490WGCH.

The 45 day public comment period ended April 16, 2009, with no comments received. As a result no significant changes were needed and the final document was brought to TTAG on May 6, 2009 for approval and development of recommendations for SWRMPO action. The PPP was approved by the SWRMPO, as the official policy on public participation and procedures for the SWRMPO on May 18, 2009.

### Acronyms Used:

- ADA** – American's with Disabilities Act
- CFR** – Code of Federal Regulations
- ConnDOT** – Connecticut Department of Transportation
- EJ** – Environmental Justice
- LEP** - Limited English Proficiency
- LOCHSTP** – Locally Coordinated Human Service Transportation Plan
- LRTP** – Long Range Transportation Plan
- MPO** – Metropolitan Planning Organization
- PP** – Public Participation
- PPP** – Public Participation Plan
- PSA** – Public Service Announcement
- SWRPA** – South Western Regional Planning Agency
- SWRMPO** – South Western Region Metropolitan Planning Organization
- TIP** – Transportation Improvement Plan
- TTAG** – South Western Region Transportation Technical Advisory Group
- UPWP** – Unified Planning Work Program

## *2009 Public Participation Plan for the SWRMPO*

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*2009 Public Participation Plan for the SWRMPO*

**Appendix A**

**Legal Noticing Review**

As part of the requirement of 23 C.F.R. §450.316(a)(1)(x) to periodically review the “effectiveness of the procedures and strategies contained in the participation plan to ensure a full and open participation process” and to work towards fiscally responsible government, the legal noticing methods of the SWRMPO were recently evaluated.

Publishing legal notices is expensive. A legal notice in a regional newspaper averaged \$123.71 per notice for an MPO meeting in FY 2006-07 and \$122.90 for FY 2007-08. If the population of the region consistently read these notices such that the cost amounted to only a few dollars per public participant this method of notice would be reasonable. However, the region has seen the following participation numbers and noticing costs over the past three fiscal years.

Fiscal Year	Regular MPO meetings	Number of Public Participants	Cost of Legal Noticing
FY 2007-08	10	0 <sup>2</sup>	\$2,212.13
FY 2006-07	10	0 <sup>1</sup>	\$2,226.73
FY 2005-06	10	0 <sup>1</sup>	\$2,065.48

This level of effectiveness is too low to justify the costs to government, making legal noticing in the region an ineffective procedure (*See* 23 C.F.R. §450.316(a)(1)(x)) and suggesting other methods should be pursued.

A more cost effective alternative, which would reach a larger number of the region’s population, is the use of media releases (public service announcements or PSAs). For this outreach a standard format will be developed and then used to advise the media, and hence the public, of MPO and TTAG activities. Additionally, notices will continue to be posted on SWRPA’s website ([www.swrpa.org](http://www.swrpa.org)). Furthermore, in the future the SWRMPO will explore other methods of outreach, such as the use of public access community calendars and new noticing formats and placements such as posters at transit stops.

Moreover, moving to these more cost effective and broader outreach methods still satisfies the requirements of 23 C.F.R. §450.316(a)(1)(x) for “full and open participation process” and 23 C.F.R. §450.316(a)(1)(i) for “adequate public notice,” as no regulation specifically requires legal noticing. In fact, these new methods should reach a broader span of the region, more than just those who subscribe to area newspapers. Additionally, to ensure effectiveness, these new methods will be monitored and evaluated annually, with participation numbers and costs documented to provide substantiation.

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<sup>2</sup> In FY 2007-08, FY 2006-07, and 2005-06 there were no public participants attributable to legal notices.



**SOUTH WESTERN REGION  
METROPOLITAN PLANNING ORGANIZATION**

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888 WASHINGTON BOULEVARD • STAMFORD, CT 06901 • (203) 316-5190 • FAX (203) 316-4995

**RESOLUTION #2009-017**

**2009 Public Participation Plan for the South Western Region Endorsement**

**WHEREAS:** The South Western Region MPO has reviewed current federal and state regulations and requirements for public participation in the metropolitan transportation planning process, and conducted a comprehensive evaluation of the MPO's process and practices.

**WHEREAS:** The *South Western Region Public Participation Plan Evaluation, October 2007* documents the evaluation and research into nationwide best practices which were used to develop the *2009 Public Participation Plan for the South Western Region MPO*.

**WHEREAS:** The public comment period for the *2009 Public Participation Plan for the South Western Region MPO* ran from March 2, 2009 through April 16, 2009, in compliance with the requirement for a 45 day review.

**WHEREAS:** No comments from the public were received and no substantive changes are needed.

**WHEREAS:** The TTAG reviewed the documents and public review process and results on May 6, 2009 and recommends that the South Western Region MPO adopt the *2009 Public Participation Plan for the South Western Region MPO*.

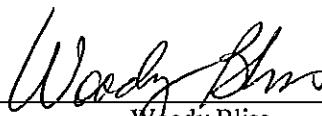
*Be it resolved that the South Western Region Metropolitan Planning Organization hereby:*

Approves the 2009 Public Participation Plan for the South Western Region Metropolitan Planning Organization

This resolution is effective May 28, 2009.

**Date:** May 28, 2009.

**By:**



Woody Bliss,  
Chairman

## **Operating Procedures for the South Western Region Metropolitan Planning Organization (SWRMPO)**

### **Preamble**

The responsibility for cooperative decision-making regarding transportation issues rests with the South Western Region Metropolitan Planning Organization (SWRMPO). The SWRMPO is composed of the chief elected officials of the cities of Norwalk and Stamford and the towns of Darien, Greenwich, New Canaan, Weston, Westport and Wilton. Each municipality is entitled to one vote. The Norwalk, Stamford and Westport Transit Districts are also members, and they share one vote equally. The Chairman of the South Western Regional Planning Agency is a non-voting member. The SWRMPO is responsible for annually reviewing and endorsing the transportation plans and programs for the South Western Region.

The South Western Regional Planning Agency (SWRPA) is the designated Transportation Planning Agency for the South Western Region and is responsible for carrying out all major planning functions outlined by the federal government. The planning function performed by SWRPA is done in cooperation with the SWRMPO; the Connecticut Department of Transportation; the Federal Highway Administration; the Federal Transit Administration; and, the Connecticut Department of Environmental Protection.

The SWRMPO is supported by the Transportation Technical Advisory Group (TTAG), which is composed of the South Western Region's municipal planners, traffic engineers, transit districts and SWRPA's transportation planner. The TTAG reviews and evaluates proposals before they are submitted to the SWRMPO.

### **Article I. Meetings of the SWRMPO**

A. Any official actions taken by the SWRMPO shall be by vote.

B. Quorum.

For the conduct of business of the SWRMPO, five-ninths of the total voting membership shall constitute a quorum.

C. Action of the SWRMPO shall be by a majority vote of the members voting, except where these Operating Procedures or any applicable local, state or federal law, regulation or order requires a greater percentage of affirmative votes.

D. Telephonic voting and participation shall be permitted. Conduct of the meeting will occur in a designated public place. Notice of the meeting will meet FOIA requirements, *SWRMPO Operating Procedures*, and MPO public involvement process noticing requirements. All materials made available to the MPO will be made available to persons attending the meeting. Non-MPO members who plan to speak at a meeting, including invited guests, are to submit copies of testimony and

handouts 24 hours before the meeting to enable MPO members to review the materials in advance. When telephonic meetings are held a roll call vote will be conducted, so the vote of each official voting member can be acknowledged and recorded. The record of votes will be available within 48 hours of meetings for all meetings.

- E. Each Chief Elected Official or official voting representative shall have one vote.
- F. The Norwalk Transit District, the Greater Stamford Transit District and the Westport Transit District shall have equal shares of one vote, i.e., 1/3 vote each.
- G. As a matter of right, any voting member of the SWRMPO may request and obtain a separate vote on any particular plan, project, or program referred to the SWRMPO for consideration and action.
- H. There shall be a minimum of six meetings of the SWRMPO each year.
- I. Special meetings and emergency meetings may be called as needed by the Chairperson. Such meeting agenda shall be prepared by the Chairperson.
- J. All meetings of the SWRMPO shall comply with the requirements of the Connecticut Freedom of Information Act and all applicable local, state and federal laws, regulations and orders, and the *SWRMPO Operating Procedures*.
- K. The SWMRPO shall operate under the latest edition of *Robert's Rules of Order* except where such rules are in conflict with any applicable local, state or federal law, regulation or order, or the *SWRMPO Operating Procedures*.
- L. **Written notice of regular meeting:** the agenda and supporting documents shall be mailed or emailed to each member of the SWRMPO at least seven (7) days prior to the meeting, Meeting agendas will be posted on the SWRPA web site on the date that such agenda is mailed
- M. **Written notice of special or emergency meeting.** The agenda and supporting documents shall be made available to the members at least 3 days prior to the meeting, except that an emergency meeting may be called without such notice when all members sign a waiver of the call of meeting. In all cases, not less than 24 hours notice shall be given. Meeting agenda shall be posted at the site of the meeting and on the SWRPA website at least 24 hours prior to the meeting.
- N. **Consent agenda:** The SWRMPO may use a consent agenda to facilitate the conduct of business at any regular meeting. Items may be placed on the consent agenda solely at the discretion of the Chairman and must be so noted on the meeting agenda. When the consent agenda is called, SWRMPO members shall have the opportunity to request that any item on the consent agenda be removed from the consent agenda and opened for discussion.
- O. **Public participation:** Opportunity for public comment will be provided during all regular or special meetings and such opportunity will be marked on each

meeting agenda as "Public Involvement." Individual speakers are limited to three minutes. Individual speakers may be granted additional time, at the discretion of the Chairperson, to address issues of particular importance to the SWRMPO. In cases where multiple persons representing a single organization indicate an interest in speaking on behalf of such organization, the Chairperson may request that those persons consolidate their statements and limit the organization's comments to five minutes.

## **Article II. Official Voting and Non-Voting Representatives**

- A. As a matter of right, any voting member of the SWRMPO may designate an "official voting representative" to cast his/her vote.
- B. The designation of an "official voting representative" must be presented to the Chairperson of the SWRMPO, in writing, by the voting member of the SWRMPO, prior to the meeting of the SWRMPO. The length of the appointment shall be specified in writing.
- C. Non-voting membership shall be extended to the Chairperson of the South Western Regional Planning Agency (SWRPA), and to contiguous Metropolitan Planning Organizations that provide reciprocal non-voting membership to the SWRMPO. Requests for non-voting membership by others shall be considered and acted upon by the SWRMPO.

## **Article III. Officers**

- A. Officers of the SWRMPO shall include a Chairperson and Vice Chairperson, who shall serve for a term of two years. In the event that a vacancy occurs in any office, a successor shall be elected at the next meeting of the SWRMPO to serve out the unexpired term.
- B. Method of Selection.  
At the last meeting of the SWRMPO in odd - numbered calendar years, nominations for Chairperson and Vice Chairperson shall be made from the floor by voting members of the SWRMPO. Once nominations are closed the Chairperson shall call separate votes to elect a new Chairperson and Vice Chairperson. Election to each office shall be by a simple majority of the members – or their official voting representatives – present and voting.
- C. Chairperson.  
The Chairperson of the SWRMPO shall be a Chief Elected Official of the SWRMPO. The Chairperson shall preside at all meetings of the SWRMPO. In the absence of the Chairperson, the Vice Chairperson shall preside. When so directed by the SWRMPO, the Chairperson shall sign all reports, plans, programs, and resolutions, which have been adopted by the SWRMPO. The Chairperson shall communicate SWRMPO policies, programs and recommendations to others as appropriate or necessary. A report on such communications shall be provided at the next SWRMPO meeting.

- D. Vice Chairperson.  
In the absence of the Chairperson, the Vice Chairperson shall assume the powers and duties of the Chairperson.

#### **Article IV – Special Committees**

- A. The Chairman shall have the authority to establish special committees as necessary. All special committees shall be temporary and will exist to further a specifically stated purpose and for a defined period of time. Special committees also may be established over the Chairman's objection by a 2/3 vote of the MPO.

#### **Article V. TTAG Voting Procedures and Official Representatives**

- A. Any actions taken by the TTAG shall be by vote.
- B. Action of the TTAG shall be by majority vote of the members voting.
- C. Telephonic voting and participation shall be permitted. Conduct of the meeting will occur in a designated public place. Notice of the meeting will meet FOIA requirements, *SWRMPO Operating Procedures*, and MPO public involvement process noticing requirements. All materials made available to the TTAG will be made available to persons attending the meeting. Non-TTAG members who plan to speak at a meeting, including invited guests, are to submit copies of testimony and handouts 24 hours before the meeting to enable TTAG members to review the materials in advance. When telephonic meetings are held a roll call vote will be conducted, so the vote of each official voting member can be acknowledged and recorded. The record of votes will be available within 48 hours of meetings for all meetings.
- D. Each municipality shall have one vote. Votes shall not be split, and all votes shall be recorded.
- E. Each Transit District in the South Western Region shall have an equal share of one vote.
- F. The voting member of the SWRMPO shall designate, in writing, the official voting representative and alternates to the TTAG.
- G. The TTAG shall operate under the latest editions of *Robert's Rules of Order* except where such rules are in conflict with any applicable local, state or federal law, regulation or order, or the *SWRMPO Operating Procedures*.
- H. All meetings of the TTAG shall comply with the requirements of the Connecticut Freedom of Information Act and all applicable local, state and federal laws, regulations and orders, and the *SWRMPO Operating Procedures*.

- I. Opportunity for public comment will be provided during all regular or special meetings and such opportunity will be marked on each meeting agenda as "Public Involvement." Speakers are limited to three minutes.
- J. Non-voting membership shall be extended to contiguous Metropolitan Planning Organizations technical advisory committees that provide reciprocal non-voting membership to the SWRMPO. Requests for non-voting membership by others shall be considered and acted upon by the SWRMPO.

**Article VI. Amendments**

- A. The SWRMPO Operating Procedures may be amended at any meeting by a 2/3 vote of the SWRMPO present and voting. Any amendment may be presented for disposition by such vote of the SWRMPO at any such meeting thereof, provided that not less than ten (10) days written notice of the proposal to effect such amendment has been given to each member of the SWRMPO and publicly noticed in accordance with the SWRMPO's adopted procedures provided there is no conflict with any applicable local, state and federal law, regulation or order.
- B. Amendments to SWRMPO Operating Procedures shall take effect immediately.

**Article VII. SWRMPO Address**

- A. The South Western Regional Planning Agency (SWRPA) offices shall be the official business address for the SWRMPO.

Adopted: 6/23/81  
Amended: 1/25/96  
Amended: 10/3/02  
Amended: 6/26/06

**SOUTH WESTERN REGION  
METROPOLITAN PLANNING ORGANIZATION**

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**RESOLUTION #2006-013 South Western Region MPO Operating Procedures Amendment**

**Be it resolved, that the South Western Region Metropolitan Planning Organization (MPO) approves the amended South Western Region MPO Operating Procedures.**

This resolution is effective **June 26, 2006.**

**Date: June 26, 2006.**

**By:** \_\_\_\_\_ *[Signed Original on File]*  
Woody Bliss,  
Chairman

# Statement of MPO Planning Roles & Responsibilities

Endorsed By the South Western Region MPO on June 30, 2008 – Resolution #2008-013

## Purpose

The purpose of this statement is to outline the roles and responsibilities of the State, the South Western Regional Planning Agency (SWRPA), the South Western Region Metropolitan Planning Organization (SWRMPO), and appropriate providers of public transportation as required by *23 CFR Sec. 450.310*. This statement is in lieu of a formal Memorandum of Agreement, per Section 450.310(e), and is incorporated in the Unified Planning Work Program per *23CFR450.314*.

## General Roles & Responsibilities

SWRPA/SWRMPO will perform the transportation planning process for their region and develop procedures to coordinate transportation planning activities in accordance with applicable federal regulations and guidance. The transportation process will, at a minimum, consist of:

1. Preparation of an annual Unified Planning Work Program that lists and describes all transportation planning studies and tasks to be completed during the year.
2. Preparation and update of a long range, multi-modal regional transportation plan.
3. Preparation and maintenance of a short-range transportation improvement program (TIP).
4. Financial planning to ensure plan and program are financially constrained and within anticipated funding levels.
5. Conduct of planning studies and system performance monitoring, including highway corridor and intersection studies, transit system studies, application of advanced computer techniques, and transportation data collection and archiving.
6. Public outreach, including survey of affected populations, electronic dissemination of reports and information (website), and consideration of public comments.
7. Ensuring the transportation planning process does not have a significant or disproportionate impact on low income, minority and transit dependent Title VI populations.
8. Development and implementation of a Congestion Management Process as appropriate.
9. Ensuring plans, projects and programs are consistent with and conform to air quality goals of reducing transportation-related emissions and attaining National Ambient Air Quality Standards.

## Long Range Transportation Plan

1. SWRPA/SWRMPO will be responsible for preparing and developing the long range (20–25 years) transportation plan for the region.
2. SWRPA/SWRMPO may develop a transportation plan summary report for the region that includes the key issues facing the area and priority programs and projects.
3. ConnDOT will provide the following information and data in support of developing the transportation plan:
  - a. Financial information - estimate of anticipated federal funds over the 20-25 year time frame of the plan for the highway and transit programs.
  - b. Trip tables - for each analysis year, including base year and the horizon year of the plan by trip purpose and mode.
  - c. Traffic count data for state roads in the South Western Region, and transit statistics as available.



- d. List of projects of statewide significance by mode, with descriptions, so that they can be incorporated into the regional transportation plans.
  - e. Assess air quality impacts and conduct the regional emissions assessment of the plan. Will provide the results of the assessment in a timely manner to allow inclusion in the plan and to be made available to the public at public information meetings. (Refer to air quality tasks.)
4. SWRPA will consult with the appropriate providers of public transportation on local bus capital projects to include in the transportation plan, and will work together to develop local bus improvements for the plan from the 10-year capital program. Through consultation, they will identify future local bus needs and services, including new routes, service expansion, rolling stock needs beyond replacement, and operating financial needs.

### **Transportation Improvement Program (TIP)**

1. The TIP will be prepared and compiled through a consultative process between ConnDOT, SWRPA and the appropriate provider(s) of public transportation.
2. ConnDOT will prepare an initial list of projects to include in the new TIP. This list will be based on the current TIP that is about to expire and an assessment of which projects will be obligated for funding before the end of the current federal fiscal year.
3. ConnDOT, SWRPA and transit provider(s) – ConnDOT will solicit comments on the TIP and incorporate where practicable.
4. ConnDOT will provide detailed project descriptions, cost estimates and program schedules. The project descriptions will provide sufficient detail to allow SWRPA to explain the projects to the SWRMPO and the general public.
5. ConnDOT will provide a list of projects obligated during each of the federal fiscal years covered by the expiring TIP/STIP. The annual listing of obligated projects should include both highway and transit projects.
6. SWRPA will compile the TIP for the Region, including preparing a narrative. Projects will be categorized by federal aid program and listed in summary tables. The TIP will be converted into a format that will allow it to be downloaded to the Region's website. SWRPA will maintain the TIP by tracking amendments and changes to projects (schedule, scope and cost) made through the administrative action process.
7. ConnDOT will develop the STIP based on the MPOs' TIPs and projects located in the rural regions of the State.
8. ConnDOT will include one STIP entry each for the Bridge program, the Highway Safety Improvement program and the Recreational Trails program. This entry will list the total funds needed for these programs for each fiscal year. All Regions will receive back up lists in the form of the Connecticut Bridge Program, the Office of Traffic Engineering Safety Plan and the Recreational Trails program administered by the Department of Environmental Protection. The one line entry will reduce the number of entries needed in the STIP.
9. ConnDOT will provide proposed amendments to SWRPA/SWRMPO for consideration. The amendment will include a project description that provides sufficient detail to allow SWRPA to explain the proposed changes to the SWRMPO. It will also provide a clear reason and justification for the amendment. If it involves a new project, ConnDOT will provide a clear explanation of the reasons and rationale for adding it to the TIP/STIP.
10. When an amendment to the TIP/STIP is being proposed by the SWRPA/ SWRMPO, the project sponsor will consult with ConnDOT to obtain concurrence with the proposed amendment and ensure financial consistency.

11. ConnDOT will provide a financial assessment of the STIP with each update. SWRPA should prepare a TIP summary table listing all projects by funding program sorted by year based on ConnDOT's financial assessment.

### **Air Quality Planning**

1. ConnDOT and SWRPA may meet at least once per year to discuss the air quality conformity process, the regional emissions analysis and air quality modeling.
2. ConnDOT will conduct the regional emissions analysis, which includes the South Western Region and provide the results to the SWRPA/SWRMPO. The regional emissions analyses for the build or future years will include the proposed transportation improvements included in the regional long-range transportation plans and TIP.
3. SWRPA will prepare a summary report of the conformity process and regional emissions analysis for the Region. It will contain a table showing the estimated emissions from the transportation system for each criteria pollutant and analysis year.
4. The summary report on the regional emissions analyses will be inserted into the long-range transportation plan and TIP.
5. SWRPA will make the regional emissions analysis available to the public.

### **Public Participation Program**

1. SWRPA/SWRMPO will annually review and evaluate its public participation program.
2. SWRPA will update and prepare a list of neighborhood and local organizations and groups that will receive notices of MPO plans, programs and projects.
3. SWRPA/SWRMPO will work to ensure that low-income, minority and transit dependent areas are afforded an adequate opportunity to participate in the transportation planning process, receive a fair share of the transportation improvement benefits and do not endure a disproportionate transportation burden. They will comply with federal legislation on these issues.
4. SWRPA/SWRMPO process for developing plans, projects, and programs will include consultation with state and local agencies responsible for land use and growth management, natural resources, environmental protection, conservation and historic preservation.
5. SWRPA will maintain their website to provide clear and concise information on the transportation planning process and provide an opportunity to download reports and documents. This will include developing project and study summaries, converting reports into a pdf or text format, and maintaining a list of available documents. The website will provide links to other associated organizations and agencies.

### **Public Transportation Planning**

1. SWRPA/SWRMPO will allow for, to the extent feasible, the participation of transit providers at all transportation technical and policy board meetings to provide advice, information and consultation on transportation programs within the planning region.
2. SWRPA/SWRMPO will provide the opportunity for the transit providers to review and comment on planning products relating to transit issues within the region.
3. SWRPA/SWRMPO will allow for transit provider(s) to participate in UPWP, long-range plan, and TIP development to insure the consideration of any appropriate comments.
4. SWRPA and ConnDOT will assist the transit provider(s) to the extent feasible with planning for transit related activities.

### **Fiscal/Financial Planning**

1. The ConnDOT will provide SWRPA with up-to-date fiscal and financial information on the statewide and regional transportation improvement programs to the extent practicable. This will include:
  - a. Anticipated federal funding resources by federal aid category for the upcoming federal fiscal year, as shown in the TIP financial chart.
  - b. Annual authorized funds for the STP-Urban account.
  - c. Annual authorized funds for the FTA Section 5307 Program.
  - d. A listing of FTA Section 5309 Bus and Section 5309 New Starts projects that are earmarked in federal legislation and also as appropriated by Congress.
  - e. Monthly updates of STP-Urban Program showing current estimated cost & scheduled obligation dates.
2. The ConnDOT will notify SWRPA when the anticipated cost of a project, regardless of funding category, has changed in accordance with the agreed upon TIP/STIP amendment and administrative action process.
3. SWRPA will prepare summary tables and charts that display financial information for presentation to the SWPMPO.

### **Congestion Management Process (CMP) Program**

1. The ConnDOT, as state's primary CMP, will provide SWRPA its congestion screening report.
2. SWRPA will review the congestion screening report and select critical corridors for analysis as a second level CMP in the state.
3. SWRPA will conduct a highway performance monitoring program that includes the collection of traffic counts, conduct of travel time surveys, and determination of travel speeds and delay.
4. SWRPA will conduct congestion strategies studies for critical corridors and identify possible improvements to reduce congestion and delay.
5. SWRPA will work with ConnDOT on programming possible congestion-reducing projects.
6. SWRPA will, upon implementation of a congestion reduction improvement, assess post-improvement operations and determine level of congestion relief.

### **Intelligent Transportation Systems (ITS) Program**

1. The ConnDOT will maintain the statewide ITS architecture and ensure consistency with the Regional ITS Architecture for the South Western Region.
2. The ConnDOT will maintain and update the Regional ITS Architecture for the South Western Region, where appropriate.

### **Amendment**

This Statement on Transportation Planning may be amended from time to time or to coincide with annual UPWP approval as jointly deemed necessary or in the best interests of all parties, including Federal transportation agencies.

### **Effective Date**

This Statement will be effective after it has been endorsed by the SWRMPO, and as soon as the UPWP has been approved by the relevant Federal transportation agencies.

**No Limitation on Statutory Authority**

Nothing contained in this Statement is intended to or shall limit the authority or responsibilities assigned to signatory organizations under Connecticut law, federal law, local ordinance, or charter.

# SOUTH WESTERN REGION METROPOLITAN PLANNING ORGANIZATION

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## **Resolution #2008-013**

### **Transportation Planning Roles and Responsibilities – June 2008**

**WHEREAS:** The South Western Region Metropolitan Planning Organization (SWRMPO) is designated as the transportation planning policy board for the South Western Region by the Governor of the State of Connecticut; and that the South Western Regional Planning Agency (SWRPA) is the designated transportation planning agency.

**WHEREAS:** Federal regulations (23 CFR 410.310) require that the responsibilities for cooperatively carrying out transportation planning (including corridor and subarea studies) and programming shall be clearly identified in an agreement or memorandum of understanding between the State and the MPO.

**WHEREAS:** The USDOT and the Connecticut Department of Transportation have developed a Statement of MPO Planning Roles and Responsibilities that fulfills the requirements of 23 CFR 410.310.

**WHEREAS:** The Statement of MPO Planning Roles and Responsibilities will be an appendix to the FY2009 and FY2010 Unified Planning Work Program.

**Be it resolved, that the South Western Region Metropolitan Planning Organization hereby:**

Endorses the *Statement of MPO Planning Roles and Responsibilities* and approves its addition to the FY2009 and FY2010 Unified Planning Work Program

This resolution is effective **June 30, 2008.**

**Dated: June 30, 2008.**

By:



**Woody Bliss,  
Chairman**

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## AFFIRMATIVE ACTION PLAN

**Company Name:**

South Western Regional Planning Agency

**Address:**

888 Washington Blvd., 3rd Floor, Stamford, CT 06901

**City/State/Zip:**

**Area Code/Phone Number:** 203-316-5190

**Area Code/Fax Number:** 203-316-4995

**Email Address:** Lapp@swrpa.org

**Contact Person:** Floyd Lapp

### POLICY STATEMENT

It is the policy of this firm to assure that applicants are employed, and that employees are treated during employment, without regard to an individual's race, color, religion, sex, national origin, age or disability. Such action shall include; employment, upgrading, demotion or transfer; recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship, pre-apprenticeship, and/or on-the-job training.

This firm will implement, monitor, enforce and achieve full compliance with this Affirmative Action Policy Statement in conjunction with the applicable Federal and State laws, regulations, executive orders and contract provisions, including but not limited to those listed below:

#### Dissemination of Policy:

All members of the firm who are authorized to hire, supervise, promote, and discharge employees, or who recommend such action, or who are substantially involved in such action, will be made fully cognizant of, and will implement, this firm's Equal Employment Opportunity (EEO) policy and contractual responsibilities to provide EEO in each grade and classification of employment. These actions shall include:

1. Periodic meetings of supervisory and personnel office employees will be conducted before the start of work and then not less often than once every six months, at which time the firm's EEO policy and its implementation will be reviewed and explained. These meetings will be conducted by the EEO officer.
2. All new supervisory or personnel office employees will be given a thorough indoctrination by the EEO Officer, covering all major aspects of the contractor's EEO obligations within thirty days following their reporting for duty with the contractor.
3. All personnel who are engaged in direct recruitment for the firm will be instructed by the EEO Officer of the contractor's procedures for locating and hiring minority group employees.
4. Notices and posters setting forth the firm's EEO policy will be placed in areas readily accessible to employees, applicants for employment and potential employees.

5. The firm's EEO policy and the procedures to implement such policy will be brought to the attention of employees by means of meetings, employee handbooks, or other appropriate means.

Recruitment:

When advertising for employees, the firm will include in all advertisements the notation; "An Affirmative Action/Equal Opportunity Employer." All such advertisements will be placed in publications having a large circulation among minority groups in the area where the work force would normally be derived.

1. The firm will, unless precluded by a valid bargaining agreement, conduct systematic and direct recruitment through public and private employee referral sources likely to yield qualified minority and female applicants. To meet this requirement, the firm will identify referral sources and establish procedures for recruitment to obtain the referral of minority and female applicants.
2. In the event the firm has a valid bargaining agreement providing for exclusive hiring referrals, he/she is expected to observe the provisions of that agreement to the extent that the system permits the contractor's compliance with EEO contract provisions. (The USDOL has held that where implementation of such agreements has had the effect of discriminating against minorities or women, or obligates the contractor to do the same, such implementation violates Executive Order 11246, as amended.)
3. The firm will encourage his/her present employees to refer minority group applicants for employment. Information and procedures with regard to referring minority group applicants will be discussed with employees.

Personnel Actions:

Wages, working conditions, and employee benefits shall be established and administered, and personnel actions of every type, including hiring, upgrading, promotion, transfer, demotion, layoff, and termination, shall be taken without regard to race, color, religion, sex, national origin, age or disability. The following procedures shall be followed:

1. The firm will conduct periodic inspections of project sites to insure that working conditions and employee facilities do not indicate discriminatory treatment of personnel.
2. The firm will periodically review selected personnel actions in depth to determine whether there is evidence of discrimination. Where evidence is found, the contractor will promptly take correction action. If the review indicates that the discrimination may extend beyond the actions reviewed, such corrective action shall include all affected persons.
3. The firm shall periodically evaluate the spread of wages paid within each classification to determine any evidence of discriminatory wage practices.
4. The firm will promptly investigate all complaints of alleged discrimination made to the firm, and will take appropriate corrective action within a reasonable time. If the investigation indicates that the discrimination may affect persons other than the complainant, such corrective actions shall include such other persons. Upon completion of each investigation, the contractor will inform every complainant of all of his avenues of appeal.

Training and Promotion:

The firm will assist in locating, qualifying, and increasing the skills of minority group and women employees, and applicants for employment. The firm will utilize the following tools to identify training and promotional opportunities in the firm:

1. The firm will advise employees and applicants for employment of available training programs and the entrance requirements.
2. The firm will periodically review the training and promotion of potential minority group and women employees and will encourage eligible employees to apply for such training and promotion.

Unions:

If the firm relies in whole or in part upon unions as a source of employees, the contractor will use his/her best efforts to obtain the cooperation of such unions to increase opportunities for minority groups and women within the unions, and to effect referrals by such unions of minority and female employees. Actions by the firm either directly or through a contractor's association acting as agent will include the procedures set forth below:

1. The firm will use best efforts to develop, in cooperation with the unions, joint training programs aimed toward qualifying more minority group members and women for membership in the unions and increasing the skills of minority group employees and women so that they may qualify for higher paying employment.
2. The firm will use best efforts to incorporate an EEO clause into each union agreement to the extent that such union will be contractually bound to refer applicants without regard to their race, color, religion, sex, national origin, age or disability.
3. The firm is to obtain information as to the referral practices and policies of the labor union except that to the extent that such information is within the exclusive possession of the labor union and such labor union refuses to furnish the information to the contractor, the contractor shall notify the Connecticut Department of Transportation (ConnDOT) of the efforts made to obtain the information.
4. In the event the union is unable to provide the firm with a reasonable flow of minority and women referrals within the time limit set forth in the collective bargaining agreement, the contractor will, through independent recruitment efforts, fill the employment vacancies without regard to race, color, religion, sex, national origin, age or disability; making full efforts to obtain qualified and/or qualifiable minority group persons and women. (The United States Department of Labor has held that it shall be no excuse that the union with which the contractor has a collective bargaining agreement providing for exclusive referral failed to refer minority employees.) In the event the union referral practice prevents the contractor from meeting the obligations under Executive Order 11246 as amended, and in compliance with 23 CFR Part 230, the firm will notify ConnDOT.

Selection of Subcontractors:

The firm will not discriminate on the grounds race, color, sex, national origin, age or disability in the selection and retention of subcontractors, including procurement of materials and leases of equipment.

1. The firm shall use his/her best efforts to ensure subcontractor/subconsultant compliance with Federal and State Equal Opportunity (EO) and EEO requirements.

Records and Reports:

The Contractor shall keep records as necessary to document compliance with EO/EEO requirements. Such reports shall be retained for a period of three years following completion of the contract work and shall be available at reasonable times and places for inspection by authorized representatives of ConnDOT and/or the United States Department of Transportation. The following records should be maintained:



1. The number of minority and non-minority group members and women employed in each work classification;
2. The progress and efforts being made in cooperation with unions, when applicable to increase the employment opportunities for minorities and women;
3. The progress and efforts being made in locating, hiring, training, qualifying, and upgrading minority and female employees;
4. Complaints of Discrimination; and
5. Information required for your Affirmative Action Plan Update.

In implementing this policy and ensuring that affirmative action is being provided, each time a hiring opportunity occurs this firm will contact and request referrals from minority and female organizations, referral sources, and media sources. All advertising will emphasize that the firm is "An Affirmative Action/Equal Opportunity Employer."

In order to substantiate this firm's efforts and affirmative actions to provide equal opportunity, the firm will maintain and submit, as requested, documentation such as referral request correspondence, copies of advertisements utilized and follow-up documentation to substantiate that efforts were made in good faith. This firm will maintain the necessary internal audit procedures and record keeping systems to report the firm's affirmative action efforts.

It is understood by me, my Equal Employment Opportunity Officer and my supervisory and managerial personnel that failure to effectively implement, monitor and enforce this firm's affirmative action program and/or failure to adequately document the affirmative actions taken and efforts made to recruit and hire minority and female applicants, in accordance with our affirmative action program in each instance of hire, will result in this firm being required to recommit itself to a modified and more stringent affirmative action program as a condition of approval. It is recognized that an approved affirmative action program is a prerequisite for performing services for the contracting agency. This plan, in addition to ConnDOT's EO/EEO contract provisions and requirements, shall constitute our ConnDOT Affirmative Program.

The ultimate responsibility for the full implementation of this firm's Affirmative Action Program rests with the Chief Executive Officer of this firm. However, the day-to-day duties will be coordinated by Floyd Lapp, Executive Director (name and title), who has been designated by me, as the Equal Opportunity Officer of this firm. In addition, each manager and supervisor, and all employees are directed to aid in the development and implementation of this program and will be held responsible for compliance to its objectives.

Gerald Ellis, Chairman, South Western Regional Planning Agency  
Name and Title of Chief Executive Officer/President  
(please print)

  
\_\_\_\_\_  
Signature of Chief Executive Officer/President

January 18, 2011  
\_\_\_\_\_  
Date

**ASSIGNMENT OF RESPONSIBILITIES**

The contractor/consultant shall designate a responsible official to monitor all employment related activity to ensure that the firm's EEO policy is being implemented. The contracting officers and equal opportunity officer (hereinafter referred to as the EEO Officer) shall have the responsibility for and must be capable of effectively administering and promoting an active program of equal employment opportunity and who must be assigned adequate authority and responsibility to do so.

I hereby appoint Floyd Lapp (name of EEO officer) as the Equal Employment Opportunity Officer of this firm. It is my responsibility as the Chief Executive Officer of this firm to notify the State of Connecticut Department of Transportation of any change in designation of EEO Officer for this firm.

*Gerald Ellis*

\_\_\_\_\_  
SIGNATURE OF CEO/PRESIDENT

Gerald Ellis, Chairman

January 18, 2011

\_\_\_\_\_  
DATE

I have been made aware of my duties and responsibilities as the Equal Employment Opportunity Officer for this firm.

*Floyd Lapp*

\_\_\_\_\_  
SIGNATURE OF EEO OFFICER

Floyd Lapp, Executive Director

January 18, 2011

\_\_\_\_\_  
DATE

## **Attachment D**

Recommended Procurement Process

## Recommended Procurement Process

February 1, 2005

**Objective:** To set a process for agency procurement to guide compliance with all applicable federal and state requirements.

**Background:** OMB Circular A-110 outlines the federal standards for procurement and cost allocation practices. Also known as the “grants management rule,” this circular and its companion circulars, A-87, A-102 and A-122, document the process to be used by state and local governments, educational institutions, hospitals and not-for-profit organizations making purchases with federal monies.

Circular A-110 separates purchases made with federal funds into four (4) categories and defines procurement practices for each of those categories. Circular A-110 guidance is as follows:

Category	Value Range of Purchase	Guidance
Micro-purchases	<\$1,000	<ul style="list-style-type: none"><li>• No competitive quote required.</li><li>• Estimates from several vendors in the local area required.</li><li>• “Fair and reasonable” is the standard.</li><li>• Minimum documentation of how estimates obtained and how a determination of “fair and reasonable” was reached.</li></ul>
Small purchases	\$ 1,000 -- \$10,000	<ul style="list-style-type: none"><li>• Develop written scope of work to be used as basis for price estimates.</li><li>• Obtain oral bids.</li><li>• Select lowest responsible bidder.</li></ul>
Other	\$10,000 -- \$50,000	<ul style="list-style-type: none"><li>• Develop written scope of work to be used as basis for price estimates.</li><li>• Obtain written bids.</li><li>• Select lowest responsible bidder.</li></ul>
Other	>\$50,000	<ul style="list-style-type: none"><li>• Open and competitive bidding process required.</li></ul>

Circular A-110 guidance is, however, superseded under two sets of conditions: (1) a federal department or agency may, through the administrative rule-making process, set more stringent requirements for its programs; and (2) a state or local unit of government may set more stringent requirements for its programs and grants.

### 1. Other federal requirements and thresholds.

Federal department and agencies that opt to use the administrative rule-making process to establish additional requirements for use of funds by state and local governments, educational institutions, hospitals and not-for-profit organizations codify such rules in the Code of Federal Regulations (CFR). A reference chart published by the federal Office of Management and

Budget citing relevant sections of the CFR is attached to this memorandum and labeled Attachment "A".

2. State requirements

Procurement guidance for departments and agencies of the State of Connecticut are contained in General Letter Number 71 which states:

- For "open market" purchases, i.e. purchases valued at less than \$2,500, no quotations or competitive bids are necessary.
- For purchases between \$2,500 and \$10,000, at least three (3) quotations or bids must be obtained.
- For purchases between \$10,000 and \$50,000, at least three (3) written quotations or bids must be received and a copy of the bid notice must be posted on the Department of Administrative Services and of Department of Information Technology websites.
- A full, open and competitive bid process must be used for all purchases equal to or greater than \$50,000. Such purchases are not governed by General Letter Number 71.
- Purchases among state agencies do not require competitive quotations. Purchases from or pursuant to contracts or cooperative agreements with federal agencies or other political subdivisions of the state do not require competitive quotations.

Although not a department or agency of the State of Connecticut, SWRPA may be subject to the requirements of General Letter Number 71. Generally speaking, SWRPA is subject to these requirements if:

- SWRPA is using state or federal funds governed by a contract or cooperative agreement with a department or agency of the State of Connecticut.
- SWRPA is using federal funds governed by a contract or cooperative agreement with a federal department or agency that expressly states that procurement practices must conform to both federal and state requirements.

A copy of General Letter Number 71 is attached to this memorandum and labeled Attachment "B".

Recommended Procurement Process: Given the varied nature and application of requirements governing the procurement of goods and services with state and federal funds, development and implementation of a rigid procurement policy is not recommended. Implementation of a process guiding procurement of goods and services is recommended. Specifically, the following process is recommended:

1. Review contract governing the funds with which a purchase is to be made:
  - Is the source of funds a state or federal department or agency?
  - Does the contract identify specific requirements for the procurement of goods and services?

2. Once the source of funds and specific contract requirements, if any, have been identified, review all applicable regulations and/or letter guidance. (See Attachments “A” and “B”.)
3. Estimate value of purchase and select appropriate procurement process. (See Attachments “A” and “B”.)
4. Follow appropriate procurement process and fully document steps.

## **Attachment E**

CTDOT Title VI Process Review Request:  
Regional Planning Organizations Questions  
South Western Regional Planning Agency

## **South Western Regional Planning Agency**

Identified areas the SWRPA needs to commit resources and staff to in the coming year(s).

- Reexamine the demographic profile using Census Block Groups (rather than Census Tracts) to be sure that all Title VI/EJ population clusters are being addressed.
- Examination of the distributions of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.
- Begin efforts to develop a Title VI/EJ Committee.
- Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.
- Continue to update the Region's website, to include a notice regarding availability, where practical, of alternative language documents. This could include a summary of major RPO documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)
- Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)
- Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.
- Consider alternative techniques other than newspapers and mailings to get out information regarding meetings.
- Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities.



## **REGIONAL PLANNING ORGANIZATIONS QUESTIONS**

1. Have the MPO's updated their demographic profile of the metropolitan planning area that includes identification of the locations of socio-economic groups, including low-income and minority populations as addressed by the Executive Order on Environmental Justice and Title VI provisions? If so, how does the demographic profile identify the locations of the socio-economic groups? Please submit a sample.
2. Does the MPOs' Planning process seek to identify the needs of low-income and minority populations? If so, how does the Planning process identify these needs? In addition, does the Planning process seek to utilize demographic information to examine the distributions across these groups of the benefits and burdens of the transportation investments included in the TIP? Finally, what methods are used to identify imbalances?
3. Does the MPOs' public involvement process have an identified strategy for engaging minority and low-income populations in transportation decision-making? Secondarily, what mechanisms exist to ensure that the public's issues and concerns are addressed? Also, what strategies, if any, have been implemented to reduce participation barriers for such populations? Finally, has their effectiveness been evaluated?
4. Has public involvement in the MPOs' Planning process been routinely evaluated as required by regulation? In addition, have efforts been undertaken to improve performance, especially with respect to low-income and minority populations? Also, have organizations representing low-income and minority populations been consulted as part of this evaluation? Finally, have their concerns been considered?
5. Does the MPOs' public outreach effort utilize media (such as print, television, radio, etc.) targeted to low-income or minority populations? If so, what media vehicle is utilized? Please provide listing of media vendors used and a sample.
6. How has the MPO included Title VI and Environmental Justice in the following:
  - a. The Long-range Transportation Plan?
  - b. The Transportation Improvement Program?
  - c. The Unified Planning Work Program?
  - d. The Public Involvement Plan?
7. Has the MPO reviewed its decision-making process or developed written policies or criteria that address consideration of all populations served by the RPO? Please provide policy.
8. How does the MPO provide access to public comments or other types of public input for decision-making?

- 9.** Are you following your Limited-English Proficiency plan?
- 10.** What manner of Transit monitoring do you perform as it relates to Title VI, LEP and E.J.?
- 11.** Do you have a Title VI Complaint process? If so, please provide a copy.
- 12.** Has your Title VI Policy and Title VI Complaint process been added to your RPO website? If yes, please provide a link to that website.
- 13.** Do you coordinate with Native American Tribal Governments?
- 14.** Are contracting opportunities for planning studies, corridor studies and other technical work available to all groups/persons? How are these contract opportunities advertised?
- 15.** How do you ensure that the required Title VI requirements are incorporated into subcontracts and agreements initiated by your RPA?