

Memo

December 2021 TAC meeting
Notes on agenda items

Discussion Items

1. Nancy O'Connor and Colin Lentz will be presenting a draft outline of SRPC's Nondiscrimination and Environmental Justice plan for discussion. This is a required document for Metropolitan Planning Organizations and concerns nondiscrimination in our outreach and planning practices relevant to regulations under Title VI of the 1964 Civil Rights Act. We'd like the updated document to be more than a "box-checking" exercise and be more specific in addressing underrepresented populations in the region.
Please review the draft outline in the meeting packet to provide comments for discussion.

2. Even though the GACIT phase of the current Ten Year Plan development is not yet finished, we need to be ahead of the game on project development so we can refine a project list and VHB has time to review projects for engineering support. Please come prepared to discuss the following approach to project solicitation and selection:
 - New proposed projects due to SRPC by end of February 2022
 - Establish a TAC project review sub-committee:
 - Even mix of municipal staff from large and small municipalities ("technical" people)
 - Urban municipalities review rural projects and vice versa.
 - Does each proposed project:
 - Fit with MPO Metro Plan goals?
 - Accomplish stated purpose?
 - Have any technical issues to discuss and resolve
 - Aim for a top ten list of potential projects
 - Sub-com present recommendation to full TAC, who makes recommendation to Policy
 - VHB needs list of candidate projects by June 2022
 - We're estimating that VHB has funding to review about 10 projects and it will take about 6 months to do all of them (unless they get some earlier)

Information items

NHDES staff will be providing a brief presentation on funding opportunities through the NH Clean Diesel program

Strafford Metropolitan Planning Organization Technical Advisory Committee Meeting

Friday, December 3rd 2021 9:00 – 10:30 AM
Hybrid Meeting

In accordance with RSA 91:A and the potential absence of a renewal to the Governor's Executive Order allowing quorums virtually, all meetings of the Commission now require an in-person quorum. The Commission is advising that most committee members still attend meetings virtually, aside from the minimum number of members needed for a quorum. It is the preference of the Commission that all other attendees participate via Zoom, however, guests may attend the meeting at the SRPC Office, Conference Room 1A, 150 Wakefield Street, Rochester, NH. In doing so, all participants have the ability to communicate contemporaneously during this meeting as follows:

Online Access: <https://us02web.zoom.us/j/81973155450?pwd=TW8vSys3SjA2MVNSTXZ1US9CdmJ2dz09>
Telephone-only Access: 1-646-558-8656 and Meeting ID: 829 0534 5549

These instructions have also been provided on the SRPC website at www.strafford.org. If anybody has a problem accessing the meeting, please email clentz@strafford.org or call (603) 994-3500.

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| 1. Introductions | 5 mins |
| 2. Staff Communications | |
| 3. Action Item(s) [Motion required] | 2 mins |
| 3.1. Minutes from November 5 th 2021 | |
| 4. Discussion Items | |
| 4.1. Outline of Nondiscrimination and Environmental Justice plan updates – will the proposed outline help us go beyond baseline nondiscrimination requirements? | 40 mins |
| 4.2. Next Ten Year Plan round – how are we going to ensure prospective projects are ready and the process is equitable? | |
| 5. Information Items | 10 mins |
| 5.1. Clean Diesel Program Presentation from NHDES | |
| 6. Other Business | 5 mins |
| 6.1. Exit 10 updates | |
| 7. Municipal Roundtable – Updates from your community | 10 mins |
| 8. Citizen's Forum – Citizens of the Strafford region are invited to speak on the subject matter of the meeting. Statements shall be limited to three minutes. | |
| 9. Adjournment | |

Reasonable accommodations for people with disabilities are available upon request. Include a description of the accommodation you will need including as much detail as you can. Also include a way we can contact you if we need more information. Make your request as early as possible; please allow at least 5 days advance notice. Last minute requests will be accepted, but may be impossible to fill. Please call (603) 994-3500 or email srpc@strafford.org.

Rules of Procedure

*Strafford Regional Planning Commission
Strafford Metropolitan Planning Organization, and
Strafford Economic Development District*

Meeting Etiquette

Be present at the scheduled start of the meeting.

Be respectful of the views of others.

Ensure that only one person talks at a time. Raising your hand to be recognized by the chair or facilitator is good practice.

Do not interrupt others, or start talking before someone finishes.

Do not engage in cross talk.

Avoid individual discussions in small groups during the meeting. When one person speaks, others should listen.

Active participation is encouraged from all members.

When speaking, participants should adhere to topics of discussion directly related to agenda items.

When speaking, individuals should be brief and concise.

The Strafford Regional Planning Commission & Metropolitan Planning Organization holds both public meetings and public hearings.

For public meetings, guests are welcome to observe, but should follow proper meeting etiquette allowing the meeting to proceed uninterrupted. Members of the public who wish to be involved and heard should use venues such as citizen forum, public hearings, public comment periods, outreach events, seminars, workshops, listening sessions, etc.

Strafford Metropolitan Planning Organization
Technical Advisory Committee

Meeting Minutes

Friday, November 5th, 2021, 9:00 – 11:00 AM

Strafford Regional Planning Commission
Rochester, NH

The meeting was called to order at 9:00am

1. Introductions

Chairman Bruce Woodruff called the meeting to order and asked for introductions.

Members Present: Bruce Woodruff, Milton, Arthur Capello, Farmington, Michael Williams, COAST, Chris Parker, Dover, Michele Mears, Somersworth, Marshall Goldberg, Brookfield

Staff Present: Colin Lentz and Jen Czysz of SRPC

Members participating remotely: Katrin Kasper, Lee, Tim White, DES, Shanna Saunders, Rochester, Kim Rummo, DOT, Leah Levine, FHA,

Staff participating remotely: Rachel Dewey, Jackson Rand, Natalie Moles, Megan Taylor-Fetter

Presenters: Julie Murphy, VHB, joining remotely

2. Staff Communications

C. Lentz stated that Autumn Scott, formally an intern for SRPC from UNH, has been hired as part time regional planner. He further explained that Autumn, along with recently hired regional planner Blair Haney, are both working as planners under circuit riders.

J. Czysz stated that SRPC is seeking interns and volunteers to assist with municipal records digitization. The scanner is on the way and should be delivered soon. SRPC is coordinating with local high schools to recruit honor students who need volunteer hours.

C. Lentz added that SRPC accountant Kathy Foster has sold her accounting business and is now working as a part time employee performing the same duties but now as an employee.

3. Action Item(s) [Motion required]

3.1. Minutes from August 6, 2021

C. Parker motioned to approve the August 6, 2021 minutes seconded by M. Williams.

Discussion: M. Williams pointed out that on the 2nd page, in discussion item 4, where it states 25% to managed response, it should state demand response. A roll call vote was taken to approve the minutes as amended: A. Capello, M. Williams, C. Parker, M. Mears, M. Goldberg, K. Kasper, T. White, S. Saunders, K. Rummo, L. Levine. The motion passed with all in favor.

3.2. Recommend targets for Public Transit safety measures

C. Lentz explained that what is being presented is a new(ish) set of measures that will be incorporated into the planning documents for federally funded public transit providers. COAST has a transit asset management plan that has been approved. These measures are directly from that and include the number and rate of fatalities, number, and rate of injuries number of safety

events, rate of safety events and system reliability. Colin explained that a safety event is something that cannot be treated on site and that COAST has an excellent record so there are very few. Rate targets are based on incidents per 500,000 vehicle revenue miles. System reliability targets are based on the mean distance or number of miles driven between mechanical failures. Colin stated that he recommends the targets in the transit asset management plan and asked members for comments.

M. Williams stated that COAST will have their 2022 targets out in January.

M. Williams motioned, seconded by C. Parker to recommend to the Policy Committee to adopt the public transit safety performance targets as proposed. A roll call vote was taken: A. Capello, M. Williams, C. Parker, M. Mears, M. Goldberg, K. Kasper, T. White, S. Saunders, K. Rummo, L. Levine. The motion passed with all in favor.

4. Discussion Items

4.1. Travel demand model – How can this tool be used for transportation planning in the region?

C. Lentz welcomed Julie Murphy from VHB and explained that SRPC hired VHB to work on the project data base as well as the travel demand model update. A while back SRPC used the seacoast model while working on air quality assessments for updates and for project inclusion. Julie Murphy introduced herself and explained that this model includes both Strafford and Rockingham counties. J. Murphy explained that there are two major backbones of a travel demand model which are the roadway network and the TAZ (traffic analysis zone) which hold all the land use. These include information on population and employment.

J. Murphy presented a closer look at the Dover area and outlined the total number of TAZs and their numbers. She outlined the model and gave a summary on what is contained in the model.

B. Woodruff asked if on the volume count comparison, is that used to calibrate the model?

J. Murphy answered yes, there are 2015 counts for daily and peak period in the model so you can compare the counts to the model volumes.

C. Lentz explained that the amount of data decreases as the road size decreases. C. Lentz stated that there is better data on interstates than the smaller roadways. He added that there could be ways to improve that data including supplemental counts to do small scale modeling. Currently the model is fine for corridor analysis but not for intersection analysis.

B. Woodruff asked if municipalities did counts on their roads could that data be incorporated into the model.

J. Murphy answered yes, it is a database, the more counts we have, the more calibration we can look at specific corridors, not just a regional basis. Sometimes the TAZs are too big for localized roads. Much more detail can be done on a location of the centroid connectors, the size of the TAZ if there was additional count information in the region.

L. Levine stated that it looks like there is transit ridership included to make this a mode split model.

J. Murphy replied that there are busses in there, it is a small percentage of the traffic. The walk bike share is done on the density of the TAZ, the model is calibrated more on vehicles. It is estimating the transit as a mode share in the model, but it is a small percentage.

L. Levine stated that with the census 2020 coming out and new information on urbanized areas, it was the plan to look at that and to integrate the data and possible functional reclassification that might come from the data.

B. Woodruff asked where the employment data comes from and what year.

J. Czysz answered that it comes from the NH Employment Agency and is from 2015.

M. Goldberg asked if municipalities conduct their own traffic counts and if the methodology is the same or different.

C. Lentz answered that SRPC is assigned traffic counts through the DOT for all the communities for their data collection. Some municipalities do their own counts but that is not reflected in the model.

R. Dewey stated that SRPC collects 110-130 traffic counts every year and DOT assigns counts on state roads. It's a mix at different locations, some are vehicle class, others volume or direction. The federal highways have a set of rules of what percentage of each road class needs to be classification vs directional vs volume. It's a good mix.

C. Lentz asked, going back the mode split question, can the data from COAST bus be used to validate the data?

J. Murphy answered that if there was information on boarding and ridership, that could be looked at.

M. Williams asked if the transit related outputs are used to syphon off the numbers to keep them out of the road counts.

J. Murphy answered its mostly siphoned off. The total number of daily bus trips is about 9000. The percentage is very small. (1%)

M. Williams asked how covid factored into the data.

C. Lentz answered the model does not show the recent counts that dropped.

B. Woodruff asked is this model is precise enough to use as a tool for large developments that are being proposed.

C. Lentz answered that at this point it is used for larger scale corridor analysis and congestion outputs. For more detail, we need supplemental counts.

J. Murphy added if there was a specific project more detail analysis could be performed.

Further discussion ensued on the potential uses for the model.

M. Williams asked when you think about air quality impacts, are congested areas determined to be increased or decreasing air quality and then fixing that congestion is presumed to increase air quality, does it factor in potential increased v/p's from induced demands when you remove congested conditions. Does it factor in that balance at all, or does it assume that the increased congestion has no impact on road usage quality.

J. Murphy answered in the regional model no. Induced travel is not incorporated in the model.

4.2. Sharing the cost of infrastructure resilience investment

C. Lentz presented a regional infrastructure resilience planning and funding approach idea. He questioned can we use the model to project a climate impact scenario where we lose a piece of the network, and the model shows what will happen to the traffic pattern. He stated that it is imperative that we do something and focus on areas that are vulnerable and important. Who owns the structure and who would end up paying for it? What is the feasibility of designing a process or a framework for collectively investing in the resilience of that piece of infrastructure if multiple communities and individuals rely on it. He stated he is interested in discussing ways to fund resilience in a targeted way and to decrease the financial burden on individual communities.

W. Burton stated that the first step is to take an inventory of the vulnerable infrastructure and prioritize those. There is a funding mechanism available for bridges that is a municipal agreement with the state and multiple towns, but it is a long process.

The members engaged in a discussion on funding responsibility and opportunities. And expressed concern over already taxed budgets and having their own projects to complete.

J. C. added that with the various appropriation funding bills that are working their way thru congress there is a potential for additional funding. As a region we want to make sure we are well poised to proactively go after those dollars. This as an opportunity for us to identify what is important to us as a region.

The members engaged in discussion on local hazard mitigation plans and how that information could be used.

J. Cysz as part of the contract with VHB, there is their project scoping team, so we have the ability to work on the planning level scopes and budgets for potential transportation budgets. C. Lentz stated the first step is to collect information from existing hazard mitigation plans and inventory and rank vulnerable infrastructure in the region. VHB can provide engineering support for planning level cost estimates and projects. Planning next TAC meeting to talk about that. There are number of things that must happen between now and when we submit another batch of projects to DOT in 2023.

5. **Other Business**

C. Lentz stated that for the Ten-Year Plan he is keeping an eye out for when the next public hearings are going to happen. The Ten-Year plan is moving forward, Wednesday night was the final GACIT hearing.

T. White stated that the state put out an RFP for clean diesel on November 11. Understanding that the grants coordinator will be contacting SRPC regarding the possibility of DES doing short presentation and give background on state clean diesel program in anticipation of the possibility of communities in the region submitting projects.

6. Municipal Roundtable – Updates from your community

B. Woodruff stated that he was contacted by a private firm that was trying to identify a site that was eligible for the state RFP for electrical charging stations. The rules of the RFP include that there has to be a parking area that exists and it has to be a certain distance from the Turnpike. B. Woodruff stated that the rules on distance are too stringent. Milton has a parking lot but it was not eligible due to that rule.

C. Parker stated that Dover had feedback from the state regarding the RFP and were told that if 20 miles from major route, so 95 inhibits a lot of communities as does 236 and others. We were looking at the exit 9 park and ride. The hidden costs would be charging costs which would have to be paid for through fees or other options.

T. White stated that on the DES website there is a recent an amendment to the wording in the RFP pertaining to the distance of proposed charging sites from the corridors included in the RFP as well as the spacing between charging sites. T. White encouraged members to go onto the website for the update and other materials.

L. Levine sent a message through CHAT that DOT's transportation asset management plan is online.

M. Williams stated that as of November 13 COAST will be reducing service again solely due to lack of CDL drivers. COAST now needs ten more CDL drivers. COAST is pursuing options to increase the size of the non CDL fleet.

C. Parker stated that on November 13 Dover will be hosting an electric vehicle showcase. C. Parker stated that after five years Dover will be going out to bid for design services for the downtown merge of one way to two way. The cost is estimated at about 20 million. He added that the Dover City Council should be adopting the capital improvements program which includes a roundabout on Dover Point Road and other transportation projects.

M. Mears asked if there is an update on complete streets project to which C. Lentz answered they are still working on it last he heard they were meeting with DOT on alternative analysis.

M. Goldberg stated that in Brookfield Route 109, a state road, seems to be getting more volume, trucks and activity. The town is looking into having the speed reduced but as it is a state road that may be difficult. He asked for feedback on the subject.

C. Lentz answered that SRPC can look at data on counts and has radar counters which give an idea of the speed of vehicles.

S. Saunders informed members that in Rochester phase two at the Ridge is on pause. Economic Development is moving forward with a potential zoning rewrite to allow residential which is a possible reason for the pause. S. Saunders stated that Planning is not in support of that. She stated that the Hoffman building and Old Slims building have both been purchased by a developer. With approval by Historic District Commission and pending approval by the planning board they will tear down those buildings and construct a new building that meets new height ordinance. They are working with the architects on an art deco design. The Hoffman building is the last standing art deco building in Rochester. The new building will consist of 50 residential units and commercial space on the first floor.

7. Citizen's Forum – Citizens of the Strafford region are invited to speak on the subject matter of the meeting. Statements shall be limited to three minutes.
No citizens were present to provide input.
8. Adjournment
C. Parker motioned to adjourn seconded by D. Hamann. Motion passed all in favor none opposed.



Nondiscrimination and Environmental Justice Plan

1. Introduction

a. Nondiscrimination Provisions

- i. **Title VI** of the Civil Rights Act of 1964 prevents against discrimination on the basis of race, color or national origin
- ii. 1970 Uniform Act (42 U.S.C. 4601) requires fair, equitable treatment of persons who will be displaced due to federally funded activities
- iii. Section 162(a) of the Federal-Aid Highway Act of 1973 prohibits discrimination based on sex (gender).
- iv. Section 504 of the Rehabilitation Act of 1973 prohibits discrimination based on a handicap or disability
- v. The Age Discrimination Act of 1975
- vi. Civil Rights Restoration Act of 1987 extends the applicability of Title VI to **all** SRPC programs and activities
- vii. 23 CFR Part 200 FHWA Title VI Program Implementation and Review Procedures
- viii. 49 CFR Part 21 US DOT's Title VI related regulations
- ix. Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency (LEP)

b. Environmental Justice

- i. Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.
- ii. Fair treatment and meaningful involvement of all people with respect to our programs, policies and activities.
- iii. Assess and address disproportionate adverse health and environmental effects of their programs, policies and activities on minority and low-income populations.

2. Policy Statement and Notice to the Public

That no person shall on the grounds or race, color, national origin, sex, age, and handicap/disability, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity conducted by the recipient regardless of whether those programs and activities are federally funded or not. (to be signed by the SRPC Executive Director)

3. Title VI and Environmental Justice Policy Goal and Objectives

a. Goal

Provide information to the public to allow active participation in the transportation decision-making process.

b. Objectives

- i. Develop and implement an outreach program to educate members of the public about transportation, land use and air quality issues and their interrelationships; and about the transportation planning process and how they can be involved in it.
- ii. Solicit the participation of local officials, community groups, and individual citizens in the transportation planning process.
- iii. Reach out to under-represented persons and groups, including low-income, minority populations and Limited English Proficiency groups through local Limited English Proficiency community leaders to ensure that decisions are made with their input take into consideration.
- iv. Inform the public of the federally funded transportation projects for each fiscal year.
- v. Provide notice to the public that the Strafford Regional Planning Commission operates its programs or conducts its planning activities subject to the nondiscrimination requirement under Title VI and those members of the public can request additional information regarding the obligations of the Planning Commission
- vi. Continually identify and implement ways to improve its public input process.
- vii. Ensure no person is denied access to or participation in MPO programs
- viii. Avoid disproportionate high and adverse impacts on communities
- ix. Improve the public involvement process
- x. Involve the public by providing opportunities early and often in the transportation planning and decision-making process
- xi. Document public involvement process, comments and responses

4. General Title VI Requirements

o Title VI Assurances

- i. Procedurally, what is to be completed, by whom and when?
- ii. Incorporation into solicitation for bids, requests for proposals and contracts
- iii. The Certifications and Assurances can be found in Appendix #

a. Notification Procedures for Protected Title VI Beneficiaries

- i. Standard notice language
- ii. Where and when notice language is provided
- iii. A copy of the public notice can be found in Appendix #

b. Nondiscrimination Coordinator

- i. Name of the Title VI Coordinator and their contact information
- ii. Coordinator's responsibilities
 - a. The Title VI/Nondiscrimination Coordinator should actively participate in the development/update efforts and should be included in the approval process
 - b. The Title VI/Nondiscrimination Coordinator should monitor how the agency implements the plan¹

c. Title VI Complaint Procedures

¹ Recommendations from NHDOT Title VI Sub-recipient Technical Guide

- i. Where and how can a complain be filed?
- ii. Complaint investigation by trained personnel
- iii. Maintenance of an official record of investigations, complaints and lawsuits
- iv. Report out of past investigations, complaints and/or lawsuits
- v. Distribution of procedures to staff
- vi. Online posting of procedures and forms
- vii. Official complaint procedures and forms can be found in Appendix #

5. The Strafford Region

This and the following sections is the core of the plan that SMPO develops to ensure we are in compliance with federal regulations. Description of the region as well as demographic data will identify protected populations. We can then use project examples, outreach techniques and plans and general considerations in all planning processes for populations that may face barriers. This will demonstrate our commitment to including all people in our planning process.

a. Region Overview

- i. Geographic location
- ii. Total population (2020 Decennial Census)
- iii. Communities in the region, population densities, and unique characteristics
 - a. The tri-cities make up the urbanized core
 - b. Durham as home to the University of New Hampshire
 - c. Somersworth as home to Little Indonesia

b. Narrative description of Strafford MPO's work

- i. What does an MPO do?
- ii. What types of projects may fall under this program?
- iii. What types of decision points are there in the transportation planning process?

c. Inclusive Public Participation

- i. What kinds of public input are considered and offered?
- ii. What people are affected by transportation decision making?
- iii. How can people be affected by these decisions?
- iv. What types of barriers exist for people to be involved in these decisions?
- v. How does it affect our region?
- vi. How can we address barriers and make decision making open and inclusive for all?

d. Data Development and Procedures

- i. Procedures for the collection of statistical data (race, color, national origin, sex, disability, and age) of participants in and beneficiaries of SRPCs programs (e.g., relocatees, impacted citizens and affected communities).
- ii. Methodology of how we collect, store and present data.
 - a. Use demographic information and other tools for Title VI and environmental justice compliance with regard to future mobility projects
 - b. Obtain demographic data on public meeting participants
 - c. Send correspondence to community leaders, community-based organizations, or local data-collecting agencies requesting their assistance in identifying the

demographics of the population affected by the agency's programs and activities²

6. Demographic Profile of the SRPC Region

a. Title VI Protected Classes

- i. Race (map, data table)
- ii. Color (map, data table)
- iii. National origin (map, data table)

b. Environmental Justice Populations

- i. Low income (map, data table)
- ii. Minority (map, data table)
- iii. Foreign born (map, data table)
- iv. Limited English Proficiency (map, data table)

c. Other Federal and State protected classes

(those not already included above)

- i. Age (map, data table)
- ii. Disability (map, data table)
- iii. Sex (map, data table of gender; discussion of pregnancy, sexual orientation, and gender identity)
- iv. Religion or creed (discussion, data if available)
- v. Veteran status (discussion, data if available)
- vi. Genetic information (discussion, data if available)
- vii. Citizenship (discussion)
- viii. Marital status (discussion, data if available)
- ix. Sexual orientation (discussion, data if available)

7. Planning for Equity and Environmental Justice

This section will describe how we take equity into account across all of our planning functions. How do we make sure that all people in the region, regardless of any barriers they may face, are included in and invited to access all transportation decision making points. This should highlight outreach techniques-Point to PPP-brief examples of innovative/accommodating outreach and all persons have a right to view SRPC plans and discuss environmental problems.

a. Equity Tools

- i. Actions to ensure and equitable transportation decision making process (see p. 65-66 of the [SRPC MTP](#))
- ii. Public participation tools
- iii. Public noticing and translation
- iv. Hold meetings and other convenings at sites accessible by public transit
- v. Others

b. Public Participation Plan

- i. Public Participation Plan (reference, summary, [link to document](#))
- ii. Inclusion of minority, low-income, or other non-traditional stakeholders
- iii. Stakeholders list and contact information

² Recommendations from NHDOT Title VI Sub-recipient Technical Guide

c. Language Assistance Plan

- i. Introduction
- ii. Four Factor Analysis
 - a. Prevalence of LEP persons
 - b. Frequency of contact with LEP persons
 - c. Importance of SRPC activities and services to LEP persons
 - d. Resources available and cost
- iii. Services and Monitoring

d. Affirmative Action Program

- i. Adopt [NHDOT's Disadvantaged Business Enterprise](#) (DBE) program by reference

e. Americans With Disabilities Act

- i. All SRPC meeting locations will be accessible to people of all abilities
- ii. Pedestrian accessibility mapping efforts at SRPC and [NHDOT](#)

f. Case Studies and Project Examples

Looking at current projects, how have we created access or provided accommodations to all of our populations for each? For each project below, provide a project description, which population(s) it affects or considers, listing of accommodations. Looking at both current and past projects, show examples of what considerations we took into account to make sure all populations were invited to the decision-making process.

- i. Summary Matrix (where and how various Title VI and EJ tools have been used within SRPC transportation planning and projects)
- ii. TAP project scoring
- iii. MTP project evaluation
- iv. Dover Equity
- v. Outreach and Engagement example

g. Community Voices

Stories/Interviews/Testimonials-TBD

8. Annual Work Plan and Reports

Mechanisms to ensure effective and efficient implementation, compliance and enforcement of nondiscrimination and Environmental Justice requirements.

a. Annual Work Plan

- i. Planned initiatives
- ii. Annual review and update of data, equity tools, case studies, and contact lists

b. Annual report

- i. Monitor compliance of Title VI and Environmental Justice requirements
- ii. Progress toward implementation of the plan's goal and objectives

9. Appendices:

- a. Title VI Notice to the Public
- b. Title VI Certifications and Assurances
- c. Title VI Complaint Form and Investigative Procedures