

STRAFFORD MPO NONDISCRIMINATION PLAN TITLE VI and ENVIRONMENTAL JUSTICE

YEARS
**2022-
2026**

APPROVED: July 15, 2022

Cover photo credits (L to R): Outdoor dining at Lilac City Grill (Photo Courtesy of Lilac City Grill); Cotton Valley Rail Trail (SRPC Photo); Downtown Somersworth (Photo courtesy of Judi Currie)

THE ROLE OF THE COMMISSION

Strafford Regional Planning Commission works with municipalities, statewide organizations and other partners to provide technical assistance with planning documents, outreach, projects and regulations. We create a space for our stakeholders to connect and share information, and we provide information to the public, offering opportunities for engagement with important planning initiatives.

We serve our communities in two additional designated roles, as a Metropolitan Planning Organization, and as an Economic Development District. We work closely with the NH Department of Transportation to implement data collection programs, assist and advocate for local transit agencies and municipal projects, and create long-range plans which address safety and quality of life. With guidance from our partners, we maintain a regional economic development strategy that includes economic trends and local priority projects. We also assist local communities with economic development strategies and facilitate regional discussion.

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MUNICIPALITIES

Barrington	New Durham
Brookfield	Newmarket
Dover	Northwood
Durham	Nottingham
Farmington	Rochester
Lee	Rollinsford
Madbury	Somersworth
Middleton	Strafford
Milton	Wakefield

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MISSION STATEMENT

Strafford Regional Planning Commission's (SRPC) mission is to comply with Title VI of the Civil Rights Act to ensure that no person is excluded from participation in, denied access to, or discriminated against in all planning activities based upon race, color, and national origin. In pursuit of this mission, SRPC will also consider categories such as age, sex, religion, sexual orientation and identity, disability (whether mental or physical), and socio-economic status to ensure equitable access to the regional planning process. SRPC commits to provide meaningful engagement and involvement to all communities with respect to our programs, policies, and activities.

STRAFFORD REGIONAL PLANNING COMMISSION TITLE VI POLICY STATEMENT

The **Title VI of the 1964 Civil Rights Act** provides that “no person in the United States shall on the grounds of race, color, or national origin be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance.” Further legislation includes protections to citizens based upon age, gender, and disability, whether mental or physical.

It is the policy and intention of SRPC to conduct all planning activities under this act and to ensure that no person is excluded from or denied the benefits of any program or activity receiving funding assistance. Furthermore, SRPC will ensure that its resources and activities are made accessible to the public, that all reasonable accommodations will be made to facilitate involvement, and that complaints of discrimination are dealt with accordingly.

Jennifer Czysz
Executive Director, Strafford Regional Planning Commission
Date:

INTRODUCTION

Strafford Regional Planning Commission (SRPC) is the designated Metropolitan Planning Organization (MPO) for the Strafford Region, which includes 18 municipalities shown in the map below. Transportation planning is a coordinated effort involving the New Hampshire Department of Transportation (NHDOT), Federal Highway Administration (FHWA), Partner State Agencies, MPOs, and the rural regional planning commissions (RPCs). The Federal legal framework for highway transportation planning is included in Title 23, Part 450 of the United States Code; federal public transit planning is included in Title 49.

SRPC is a forum for collaborative transportation planning and decision-making amongst its 18 member municipalities. Representatives from those municipalities make up the MPO Policy Committee and act as the formal decision-making board. The Policy Committee is supported by a Technical Advisory Committee made up of technical staff from municipalities and state and regional agencies.

SRPC also has an Executive Committee that is responsible for the administration of the Metropolitan Planning Organization, ensuring that policy and planning recommendations are brought before the Policy Committee, and that the decisions of the Policy Committee are carried out. As such, we consider the activities of all committees to equally comply with Title VI to ensure there is no discrimination against any individual or group.

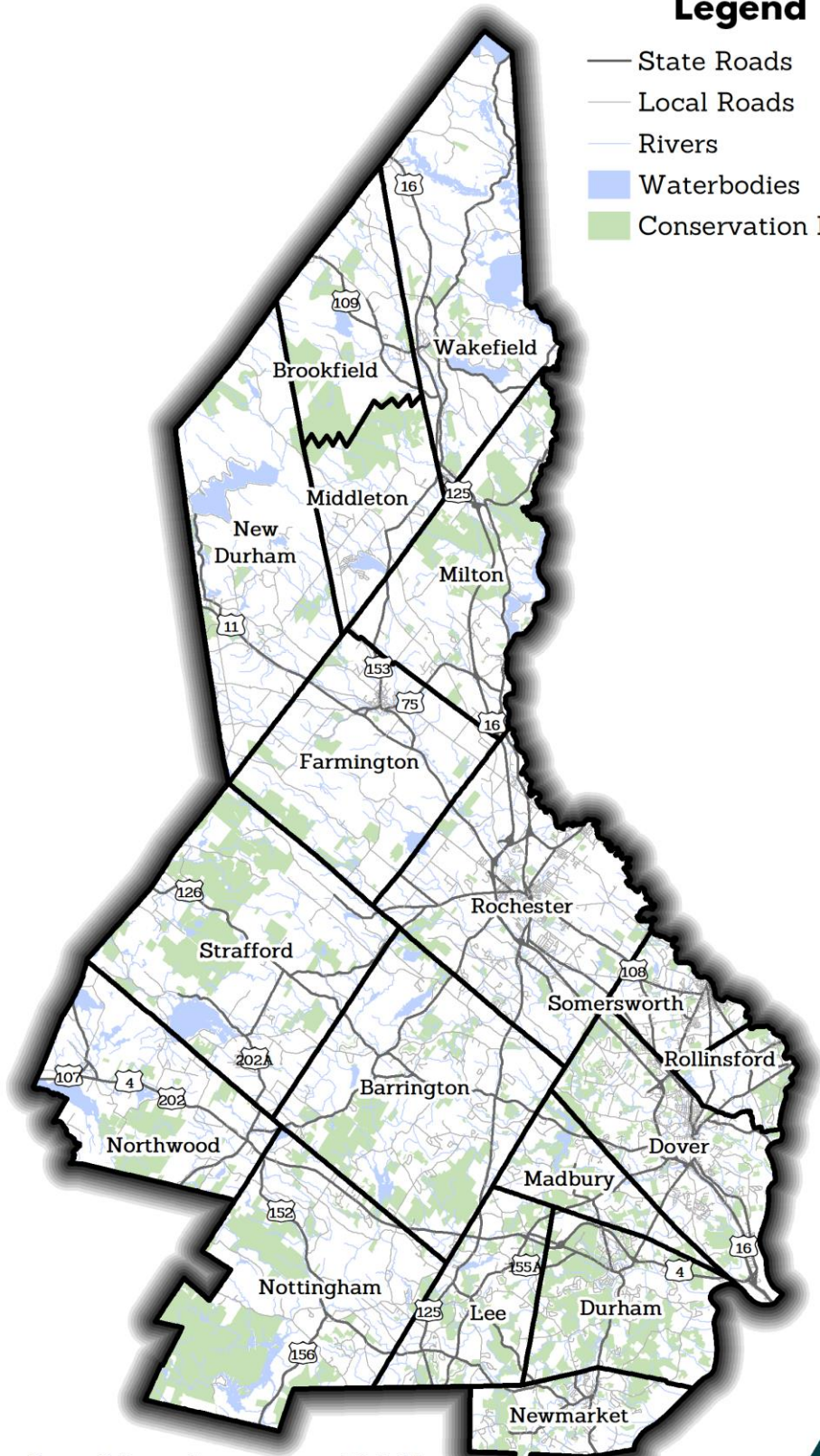
The transportation system and transportation policies play a major role in determining where people live, how they get to work, what modes of travel they choose, and where businesses develop. Transportation also plays a significant role in the environmental quality and livability of an area. Because transportation decisions have such a large impact on public health and wellbeing, the MPO process is founded on a framework of inclusive public participation. Public involvement should be designed to avoid, minimize, and mitigate potential impacts from planning activities and projects by allowing the MPO to identify solutions that best serve the entire population.

Our role in this public involvement is to ensure that we invite and solicit as much engagement with the public as possible. Typically, this is done through public meetings, public notices, public comment periods, news outlets, our advisory committees, presentations, and participation in public forums as well as social media. Our public participation efforts are documented in our [Public Participation Plan](#) which was last updated in 2020.

While we make our best effort to publicize and share our planning process and decision points, there are commonly few members of the public engaged, outside of our committees. The focus of this program is to ensure that we become a more active and inclusive MPO, expanding our activities to actively reach out to and involve more members of the public and particularly those who are not traditionally heard during the transportation planning process. We want to find ways to increase their involvement so that decisions are made with the input of all people and affected communities. SRPC submits a yearly report to the NHDOT reviewing activities and updates to our TITLE VI program.

Legend

- State Roads
- Local Roads
- Rivers
- Waterbodies
- Conservation Lands



0 2.5 5 10 Miles



HISTORIC CIVIL RIGHTS LAWS THAT SRPC MUST FOLLOW

- 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)

ENVIRONMENTAL JUSTICE

- i. Executive Order 12898: required action by federal agencies to address environmental justice in minority and low-income populations.
 - a. Fair treatment and meaningful involvement of all people with respect to our programs, policies, and activities.
 - b. Assess and address disproportionate adverse health and environmental effects of their programs, policies and activities on minority and low-income populations.
 - c. Policy Statement and Notice to the Public

TITLE VI AND ENVIRONMENTAL JUSTICE POLICY GOAL AND OBJECTIVES

Goal

To conduct the transportation planning process (and all activities) within a framework that is open, inclusive, inviting, and transparent to allow for and encourage participation by all populations within the SRPC region.

Objectives

- 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.
- Involve the public by providing opportunities early and often in the transportation planning and decision-making process
- Solicit the participation of local officials, community groups, and individual citizens in the transportation planning process.
- Identify traditionally under-represented persons and groups, including low-income, minority populations and Limited English Proficiency groups
- Identify and reach out to community leaders to ensure that we are engaging a diverse cross-section of their community to inform planning processes.
- Use varied forms of communication to inform and engage the public in the planning process. Methods will include as appropriate, the SRPC website, social media platforms, newspaper, newsletters, community forums, radio, mailings as appropriate.
- Inform the public of the federally funded transportation projects for each fiscal year.
- Provide notice to the public that the Strafford Regional Planning Commission operates its planning activities subject to the nondiscrimination requirement under Title VI
- Actively and continually identify new methods to engage underrepresented populations and those not traditionally involved in the planning process.
- Identify and avoid disproportionately high and adverse impacts on communities
- Document public involvement process, comments, and responses

GENERAL TITLE VI REQUIREMENTS

TITLE VI ASSURANCES

[This document](#) assures that SRPC will comply with all relevant federal laws pertaining to Title VI of the Civil Rights Act as a condition of receiving federal funding. The nondiscrimination coordinator should update the SRPC Assurance of Nondiscrimination document on the SRPC website at the time when the Title VI annual report is submitted to NHDOT on 9/1.

SRPC will insert the following notification in all solicitations for bids, Requests for Proposals for work, or material subject to the Acts and the Regulations made in connection with all Federal-Aid Highway Program activities and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

"The Strafford Regional Planning Commission in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award." The Certifications and Assurances can be found in Appendix B

NOTIFICATION PROCEDURES FOR PROTECTED TITLE VI BENEFICIARIES

SRPC provides the following standard notice language for all public meetings and public comment periods:

"Reasonable accommodations for people with disabilities, and others such as the Limited English Proficiency population, are available upon request. Include a detailed description of the accommodation you will need along with your contact info. Please make your request as early as possible; allowing 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."

NONDISCRIMINATION COORDINATOR

Colin Lentz, Senior Transportation Planner
clentz@strafford.org
(603) 994-3500 ext. 102

The Title VI/Nondiscrimination Coordinator will actively participate in the development/update efforts and should be included in the approval process. The Title VI/Nondiscrimination Coordinator will monitor how the agency implements the plan¹

¹ Recommendations from NHDOT Title VI Sub-recipient Technical Guide

TITLE VI COMPLAINT AND INVESTIGATION PROCEDURES

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990, for alleged discrimination in any program or activity administered by The Strafford Regional Planning Commission (SRPC).

These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the NH DOT may be utilized for resolution. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited under Title VI and related statues may file a written complaint to the following address:

Title VI Coordinator
Strafford Regional Planning Commission
150 Wakefield Street- Suite 12, Rochester, NH 03867
Phone: (603) 994-3500

The following measures will be taken to resolve Title VI complaints:

A formal complaint must be filed within 180 days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the complainant's name, address and telephone number; name of alleged discriminating official, basis of complaint (race, color, and national origin), and the date of alleged act(s). A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints.

In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the SRPC Title VI Coordinator. Under these circumstances, the complainant will be interviewed, and the SRPC Title VI Coordinator will assist the Complainant in converting the verbal allegations to writing.

SRPC will investigate complaints filed with the Department against contractors, consultants, or other sub-recipients. Complaints filed directly with the SRPC against the SRPC shall be forwarded to the appropriate NH DOT agency for investigation.

When a complaint is received, the Title VI Coordinator will provide written acknowledgment to the Complainant, within ten (10) days by registered mail. At the same time, the complaint will be forwarded to the State of New Hampshire Attorney General's Office and to the appropriate NH DOT agency.

If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided sixty (60) business days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit. Within fifteen (15) business days from receipt of a complete complaint, the SRPC

will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) days of this decision, the Executive Director or his/her authorized designee will notify the Complainant and Respondent, by registered mail, informing them of the disposition.

If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision. If the complaint is to be investigated, the notification shall state the grounds of the SRPC's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.

When the SRPC does not have sufficient jurisdiction, the Executive Director or his/her authorized designee will refer the complaint to the appropriate State or NH DOT agency holding such jurisdiction. If the complaint has investigative merit, the Executive Director or his/her authorized designee will assign an investigator. A complete investigation will be conducted, and an investigative report will be submitted to the Executive Director within sixty (60) days from receipt of the complaint. A copy of the investigative report shall be forwarded to the respective NH DOT agency within the same period. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations and conciliatory measures where appropriate. If the investigation is delayed for any reason, the investigator will notify the appropriate authorities, and an extension will be requested.

The Executive Director or their authorized designee will issue letters of finding to the Complainant and Respondent within ninety (90) days from receipt of the complaint. If the Complainant is dissatisfied with the SRPC's resolution of the complaint, they have the right to file a complaint with the:

Departmental Office of Civil Rights - U.S. Department of Transportation
1200 New Jersey Ave, S.E., Washington, DC 20590
(202) 366-4648

SMPO TITLE VI COMPLAINT FORM

Adopted from the NHDOT-SRPC's Title VI Complaint Form can be found here:

<https://www.nh.gov/dot/org/administration/ofc/documents/title-VI-complaint-form.pdf>

Submit form and any additional information to:

Jenifer Czysz, Executive Director
Strafford Regional Planning Commission
150 Wakefield Street, Suite 12
Rochester, NH 03867
Phone: (603) 994-3500
Fax: (603) 994-3500
Email: srpc@strafford.org
www.strafford.org

To date *SRPC has not received any Title VI Complaints

THE STRAFFORD REGION

This is the core of the plan that SMPO develops to ensure we comply with federal regulations. Description of the region as well as demographic data will identify protected populations. This will demonstrate our commitment to including all people in our planning process.

GEOGRAPHIC LOCATION

Eighteen communities make up the Strafford MPO region, which is centered around the Dover-Rochester, and Somersworth urbanized area. Around the core urbanized area are urban clusters in Farmington, Rollinsford, and Durham. The Strafford MPO shares a border with Maine, and is about 60 miles from Boston, Massachusetts, or Portland, ME. The New Hampshire Lakes Region and White Mountains lie to the north, which offer opportunities for recreation and tourism. The Seacoast and Greater Boston to the south have strong economic influences on Southern New Hampshire due to employment opportunities and proximity. Most of the region's population live in the cities of Dover, Rochester, and Somersworth. The cities are concentrated job centers but there are large employers scattered throughout the rural towns as well.

The 2020 Decennial Census showed that the Strafford MPO has a total population of 156,145 people, which is just under 9% of the total state population. The regional population grew 5.9% between 2010 and 2020 and it is expected to grow another 10% through 2045^[1]. The region is characterized by multiple features, resources, and trends:

- Settlement patterns that developed around historic mill buildings and industries along the region's five tidal rivers and the Great Bay estuary.
- Housing costs are very high, especially in urban communities, and vacancy rates are currently extremely low.
- Large volumes of people commuting daily for employment, many of them commuting from outer rural communities where housing is more affordable to urban centers where jobs are concentrated.
- The district's largest employer is the University of New Hampshire's flagship campus – a Tier 1 Research University. The University is complemented by Great Bay Community College, Granite State College, and other technical and vocational training centers.
- The district's median age is 37 years, slightly less than the United States average of 37.8 years and considerably below the New Hampshire median age of 42.7 years.
- Amtrak's *Downeaster* has stops in Dover and Durham and has daily trips between Boston and Brunswick).
- The Downeaster shares tracks with local and inter-regional freight rail shipments.
- Two regional fixed route transit providers (COAST and UNH Wildcat Transit).
- Intercity bus service with daily buses to Boston South Station and New York City.

^[1] http://strafford.org/uploads/documents/plans/rpc/datasnapshot_2022.pdf

NARRATIVE DESCRIPTION OF STRAFFORD MPO'S WORK

MPOs are public agencies comprised of representatives from local governments in urbanized areas with populations of over 50,000 (based on the census). They are responsible for conducting a regional transportation planning process defined by federal law. Every community has improvement projects they would like to make happen. They can be implemented through various funding opportunities and include general roadway and intersection improvements, safety-focused improvements, pedestrian and bicycle infrastructure, projects to reduce congestion and improve air quality, and public transit enhancements.

Every community in the region automatically has a seat at the table to discuss regional goals, prioritize projects, and develop regional transportation plans. Participation is a chance to advocate for issues and projects that are important to the residents of the region. The transportation decision-making process is overseen by members appointed to the MPO by their municipalities to represent residents of the community. The process also includes direct solicitation for input from the public for full plan updates, new transportation projects and major changes to existing projects that involve significant costs or other impacts.

INCLUSIVE PUBLIC PARTICIPATION

SRPC operates according to guidelines described in our Public Participation Plan. SRPC holds public comment periods for many of its transportation decisions. Technical Advisory Committee and Policy Committee meetings are noticed, advertised, and open to the public. All comment periods are publicly noticed in newspapers and on our website, weekly newsletters, and social media platforms.

With the update to our Title VI program, we will continue to pursue all these measures as well as expanding upon them to create a more proactive and inclusive process. New initiatives will be outlined in the planning section of this document,

All people in the region are affected by transportation decision-making. Whether it is how they get to school or work, access food and other necessities, get children to childcare, or access healthcare, the decisions made affect all residents in all our communities. It is imperative to have the voices of all residents heard. Inclusive public engagement is the most effective way for transportation decision makers to understand how projects and plans may affect the people they are meant to serve.

People can be affected in many ways by decisions made through the MPO process. Changes to the road network could affect the way people get around their neighborhood by car or on foot. Similarly, decisions about the extension of sidewalk networks should include residents with physical disabilities and parents with young children. For transportation planning to be equitable, the voices of all those affected must be included in the process of decision making.

Often, people who stand to be most affected by transportation decisions may not be able to actively participate in the decision process. They may have a disability that affects their mobility, their primary language may not be English, or they may be just busy with work and family. This should not disqualify a person from having their voice heard, so it is important to recognize what barriers exist that may impact their potential to be involved. SRPC works to identify and recognize these limitations and expand our techniques for outreach and information dissemination. We want to ensure that all people and communities affected by transportation decision making are aware, notified, able to engage, and heard in the process.

DATA DEVELOPMENT AND PROCEDURES

SRPC uses a mixed method approach to data collection. This means incorporating both quantitative data collection and social science practices. Quantitative data collection includes census data analysis, community asset mapping, and disaggregation of data by demographic indicators to increase understanding of inequity patterns. Social science practices include conducting personal interviews, focus groups, and ground truthing to validate quantitative data collection. Doing so allows for assessment of both a community's deficits and their strength or sources of resilience.

1. SRPC uses demographic data from the US Decennial Census and American Community Survey with supplemental information provided on population estimates from the NH Office of Planning and Development.
2. Other ways we collect, store, and present data:
 - Use demographic information and other tools for Title VI and environmental justice compliance with regard to future mobility projects
 - SRPC is developing a tool to quickly process ACS data. Tables and charts are created in Excel, maps are made in ArcMap. The data is also published in our annual data snapshot. A data disclaimer is in the snapshot. Documentation for the ACS Processing Tool is coming soon.
 - Obtain demographic data on public meeting participants
 - 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
 - SRPC maintains regular relationships with its communities primarily through its standing committees and is continually working to communicate and update all data referring to our population.

² Recommendations from NHDOT Title VI Sub-recipient Technical Guide

PLANNING FOR EQUITY

EQUITY TOOLS

SRPC strives to conduct all planning activities in an inclusive, transparent, and inviting manner. We adopt a “Learn, Assess, and Act” approach. Both quantitative and qualitative methods of data collection are used to obtain the most complete picture of a community’s potential impacts. In the learn and assess phases, we conduct a variety of outreach techniques, tailored to best meet the needs of affected communities, and to ensure that all voices and concerns are heard. The table below outlines the practices SRPC uses to ensure that equity and inclusion are considered in any decision making. SRPC hopes to recognize and address any perceived issues and will continually update this action list to reflect changes or gaps that occur or are brought to our attention.

TITLE VI POPULATION FOCUS AREAS IN THE REGION

As stated above, in pursuit of the purpose and intent of Title VI, SRPC does not discriminate against or exclude anyone based on race, color, or national origin. In addition to demographic categories specified under title VI, SRPC also considers factors such as sex, age, creed, disability, or income status. Achieving the intent of the Civil Rights Act and fulfilling our role requires that SRPC understand the demographic makeup of the region and identify areas where people are potentially isolated from the planning process.

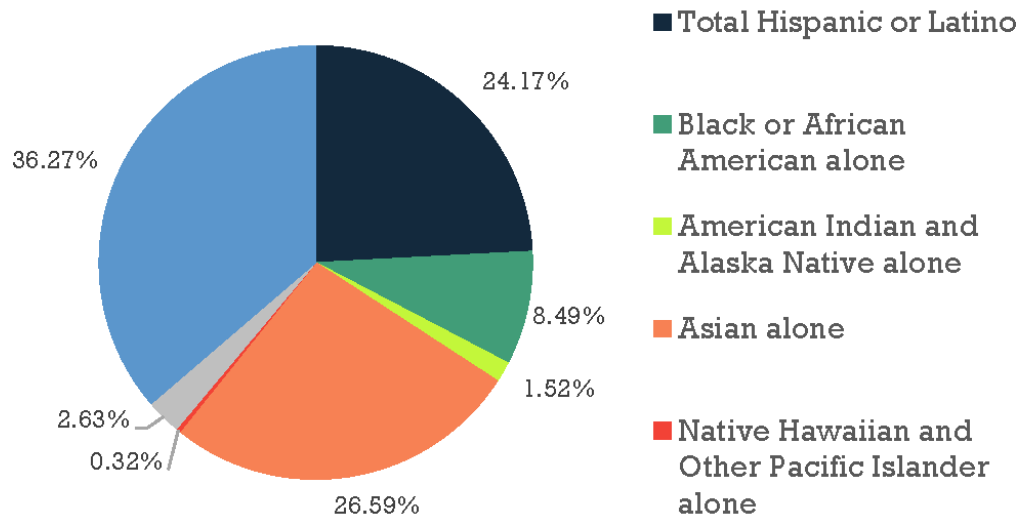
The pages below highlight demographic data that SRPC use to identify where additional outreach efforts are needed to reach a diverse representation of the region’s residents.

Race and Ethnicity

While New Hampshire currently has one of the smallest concentrations of racial and ethnic minorities in the country, diversity within the SRPC region is increasing. Minority populations appear to be primarily concentrated in the three cities (Dover, Rochester, Somersworth) and Durham.

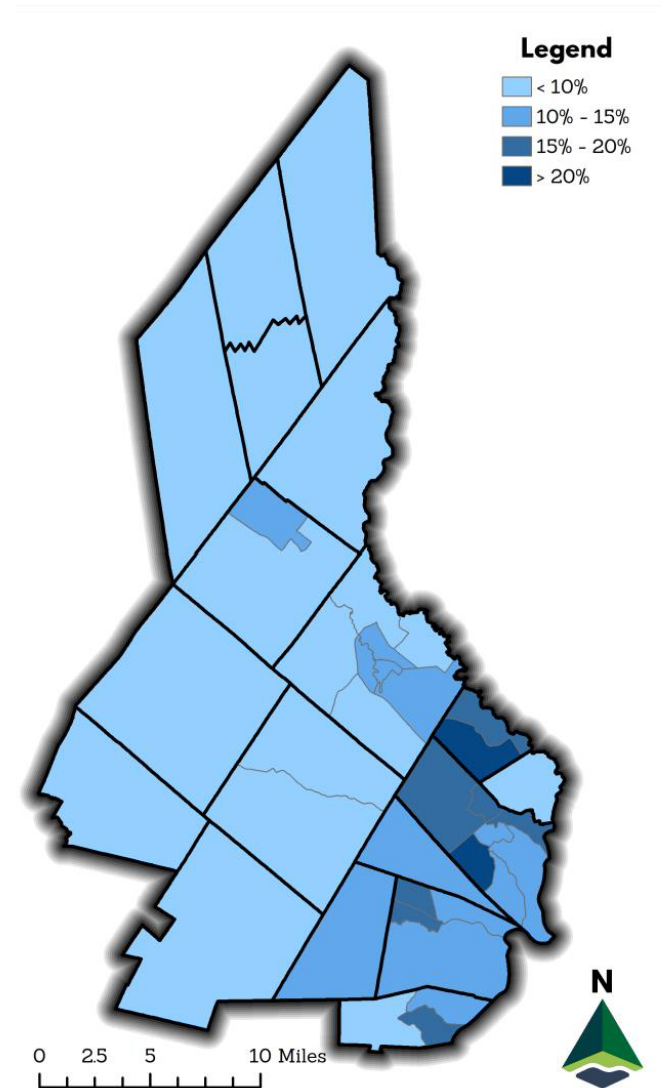
Notable known minority populations in the region include the Indonesian population in and around Somersworth and non-white UNH students (approximately 2,000 students!).

Race and Ethnicity of the Non-White Population



[1] <https://www.unh.edu/institutional-research/student-data>

Source: US Decennial Census. Year: 2020. Granularity: Census Tracts.



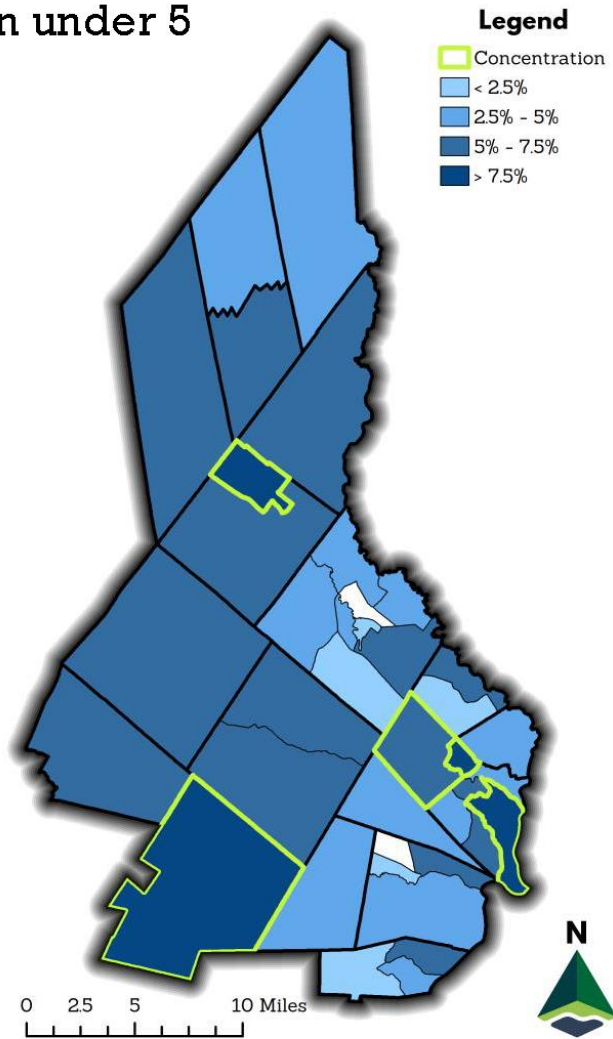
Population by Race and Ethnicity

Geography	Total Population	Non-Hispanic White Alone	Total Racial and Ethnic Minority	Total Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some Other Race alone	Two or More Races
Barrington	9,326	8,567	759	175	39	8	106	0	24	407
Brookfield	755	723	32	7	0	1	0	0	0	24
Dover	32,741	27,783	4,958	1,047	520	39	1,793	5	134	1,420
Durham	15,490	13,046	2,444	653	207	51	825	10	14	684
Farmington	6,722	6,113	609	118	46	33	48	4	25	335
Lee	4,520	3,988	532	123	25	4	160	2	19	199
Madbury	1,918	1,738	180	26	6	2	71	1	11	63
Middleton	1,823	1,714	109	15	8	4	7	0	3	72
Milton	4,482	4,138	344	62	18	13	35	1	17	198
New Durham	2,693	2,533	160	31	8	5	11	0	6	99
Newmarket	9,430	8,309	1,121	301	84	8	339	13	21	355
Northwood	4,641	4,302	339	86	16	10	39	3	9	176
Nottingham	5,229	4,810	419	103	20	1	47	1	33	214
Rochester	32,492	29,004	3,488	1,016	327	57	518	10	70	1,490
Rollinsford	2,597	2,392	205	74	19	6	13	1	3	89
Somersworth	11,855	9,631	2,224	509	198	26	866	6	59	560
Strafford	4,230	3,952	278	65	13	3	20	2	18	157
Wakefield	5,201	4,881	320	65	19	11	27	1	21	176
SRPC	156,145	137,624	18,521	4,476	1,573	282	4,925	60	487	6,718
SEDD	136,845	120,203	16,642	3,986	1,453	263	4,500	43	424	5,973

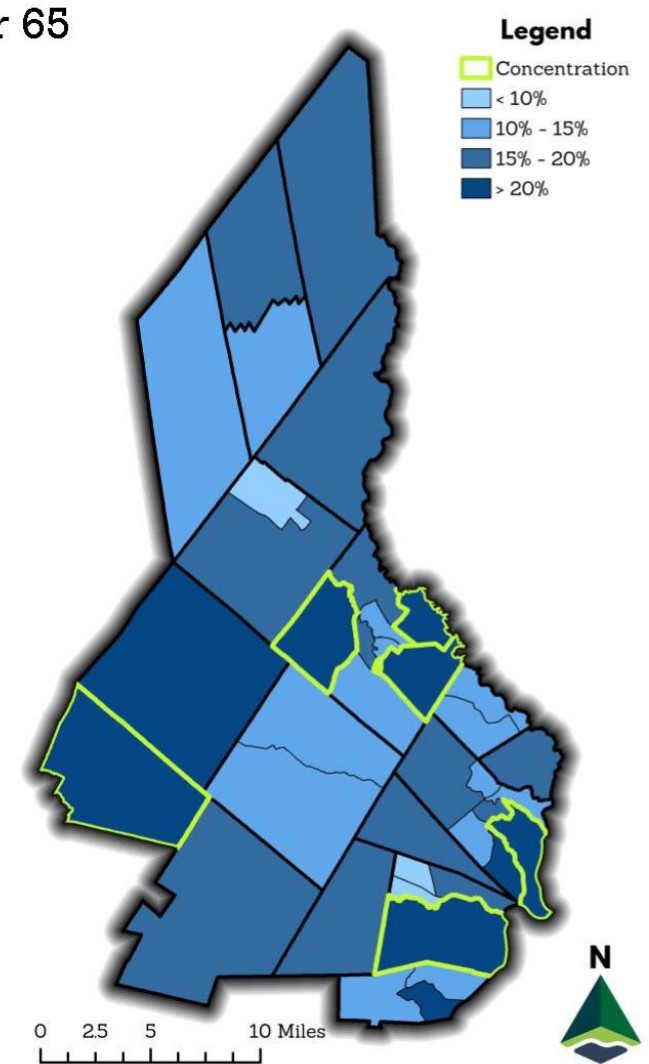
Source: US Decennial Census. Year: 2020. Granularity: Municipalities.

Age

Children under 5



Adults over 65



Source: US Census Bureau ACS. Year: 2020. Granularity: Census Tracts.

Sex

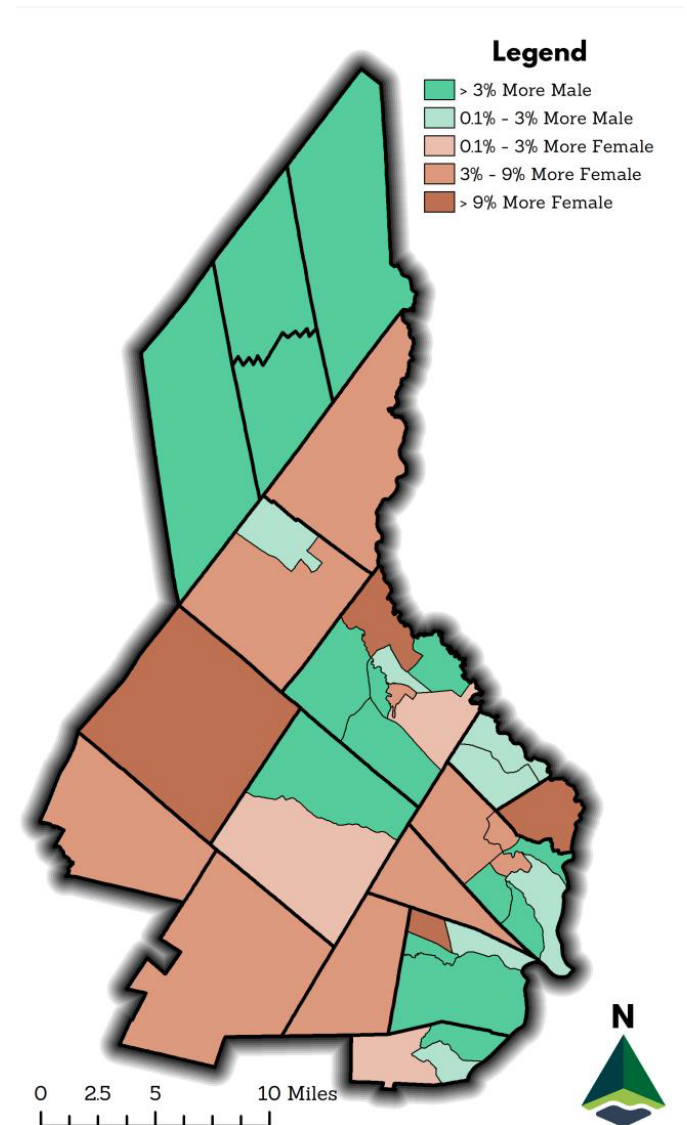
Disclaimer: The ACS survey only supplies two options for the choice of sex in its questionnaire. ACS data is reflective of sex as reported by respondents and not necessarily of gender identity.

ACS only surveys a small sample of housing units each year. As a result, data may be skewed by the housing units selected. As expected, the vast majority of SRPC tracts cluster around 50% male and female and the variance in data is consistent with random population distribution or minor variation due to sample size.

One of the four Census tracts in Durham is an outlier from this typical variation. The tract north of Main St and west of Madbury Rd appears to be 25% more female than male (i.e. 62% of tract residents are female and 38% are male). About 4,500 of the roughly 5,100 residents of that tract are between the ages of 18 and 24. Of those 4,500 residents, about 63% were female.

This trend is generally consistent with enrollment data reported by UNH for the total student body (approximately 1,000 more female undergraduate students than male undergraduates). For this reason, it may be reasonable to assume that this census tract does have more female residents than male. It could be true that over 60% of the students on this side of Main St and Madbury Rd are in fact female. Several dorms and sorority houses are present, so it is possible. It could also be that ACS sampling methods are artificially inflating the female population of this tract if a couple of sorority houses were surveyed. Once the Age and Sex data from the 2020 Decennial Census becomes available, it can be used to further analyze this trend.

Map - Source: US Census Bureau ACS. Year: 2020. Granularity: Census Tracts.
UNH Enrollment - Source: UNH. Year: 2020. Granularity: Durham.



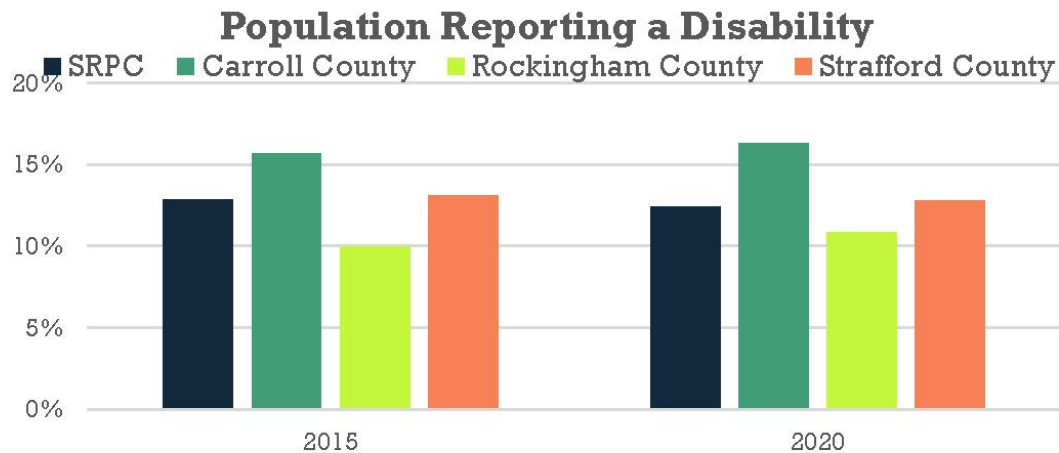
Disability

The percent of the population with a disability is calculated as the total population reporting any disability in a Census Bureau survey. While these rates are roughly the same for 2015 (12.9%) and 2020 (12.4%), the disabled population is still expected to increase with the rising median age in the SRPC region, particularly in municipalities in the northern half of the region. This will also become apparent as the age-dependent population in both the SRPC region and all of New Hampshire is weighed more heavily by the 65+ population than minor populations.

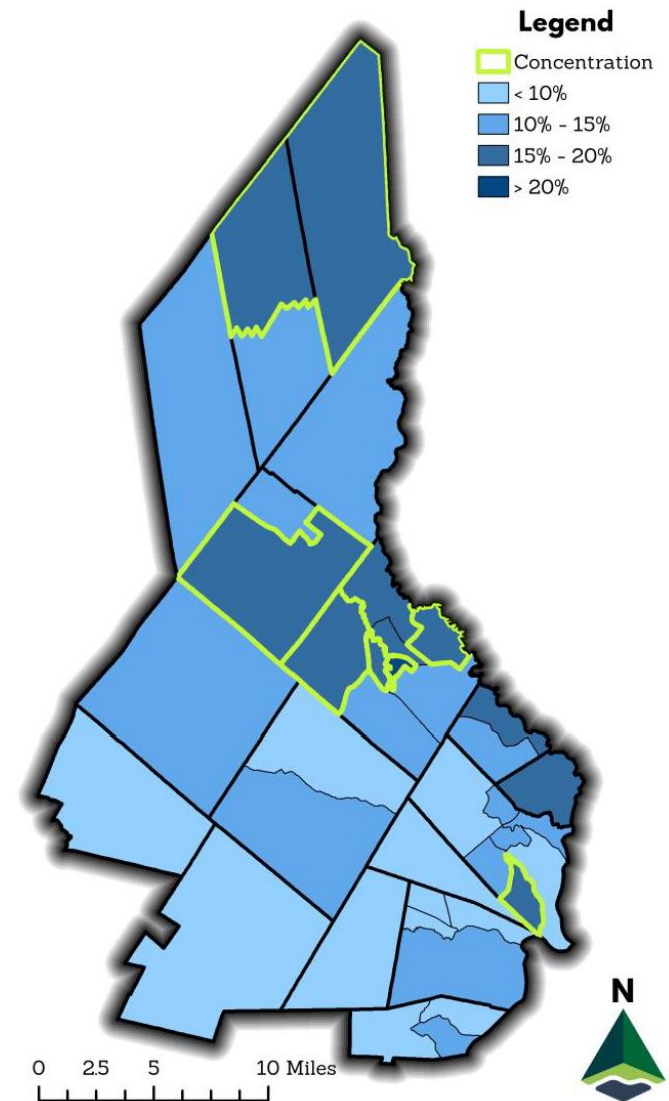
The following types of disabilities are captured by the ACS:

- Hearing difficulty
- Vision difficulty
- Cognitive difficulty
- Ambulatory
- Self-care difficulty
- Independent living difficulty

As the sample size in the ACS is very small, the chart and map of disabled populations reflects only the total population experiencing a disability, rather than particular types of disabilities experienced.



Source: US Census Bureau ACS. Year: 2020. Granularity: Counties, Census Tracts.



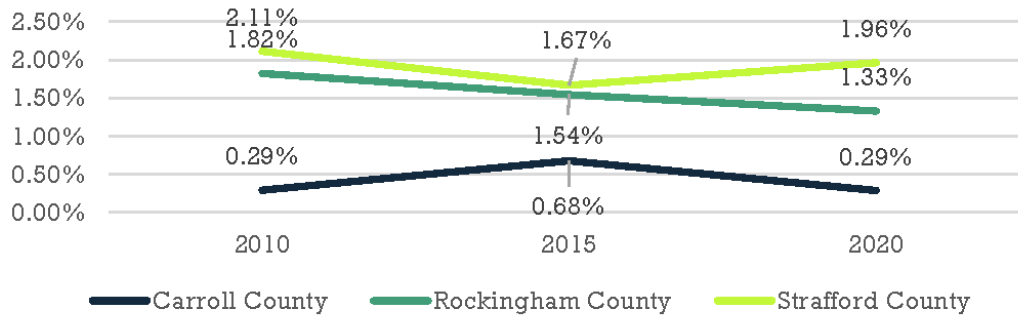
Individuals with Limited English Proficiency

Individuals with Limited English Proficiency (LEP) are people over the age of 5 who do not speak English at least “Very Well”.

Census municipal ACS¹ data indicates that there are LEP Individuals in Dover, Durham, Rochester, and Somersworth. There may also be some LEP Individuals in Lee and Newmarket, although the data quality is very poor in those communities, so it is unclear if this is an accurate estimate.

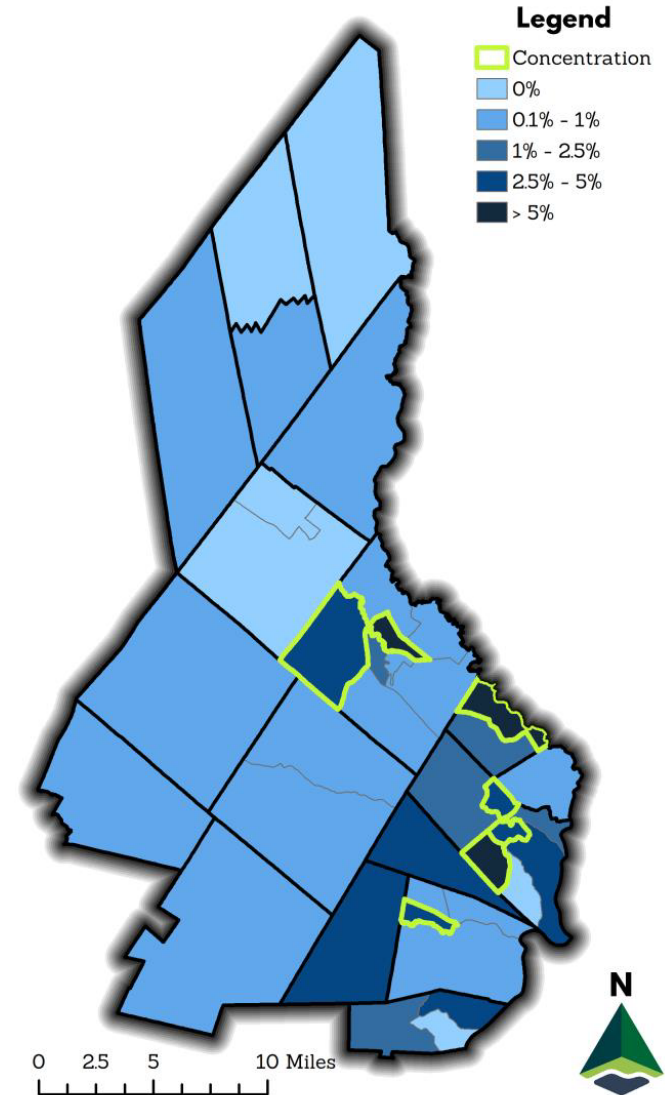
Data for this particular metric is very limited. The data was removed (as described in the Census Data Disclaimer) for almost all of the municipalities and tracts in the region. As a result, data for counties are available in the chart below.

Individuals with Limited English Proficiency



¹ This assumption is based on the presence of two or more non-overlapping 5-year estimates (2006-2010, 2011-2015, and 2016-2020) that have estimates for with the margin of error does not exceed the estimate.

Source: US Census Bureau ACS. Year: 2020. Granularity: Counties, Census Tracts.

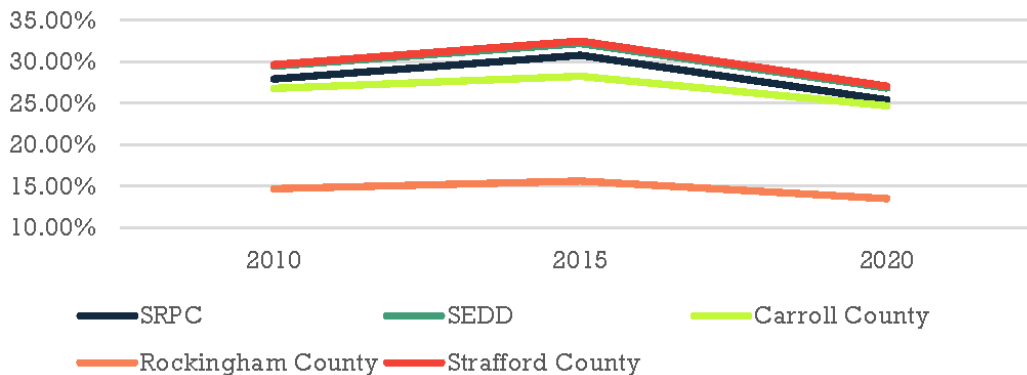


Poverty

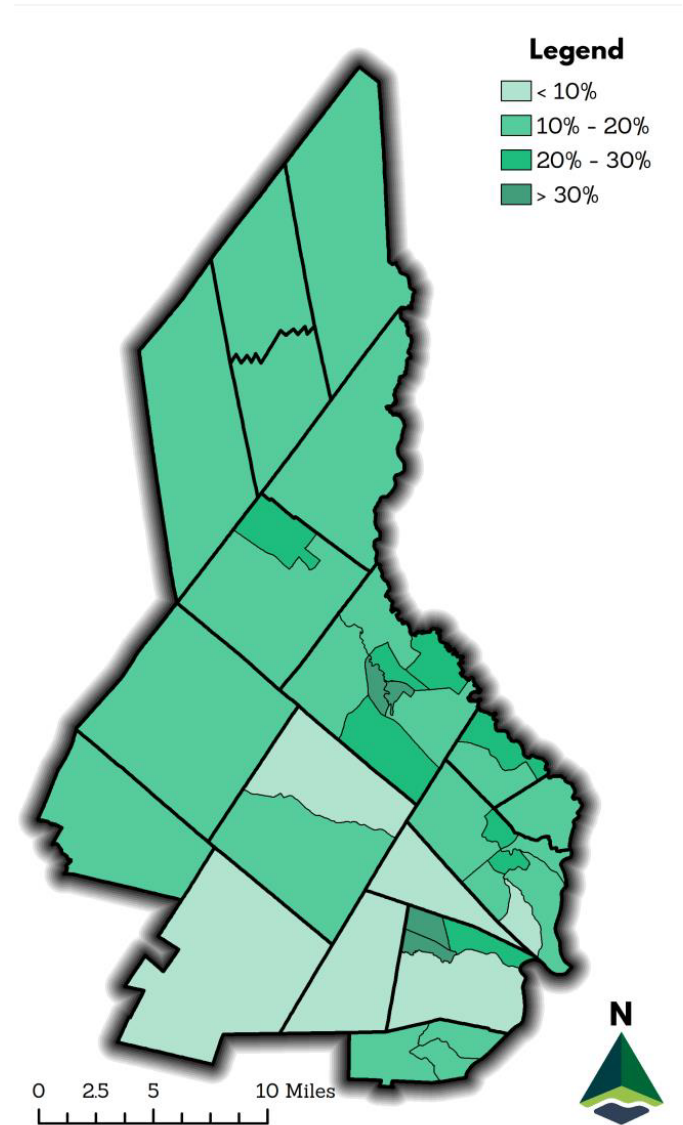
Each year the US Census Bureau calculates poverty thresholds based on a selection of household configurations. These assumptions are based on the age of the head of household and the presence of children. In addition to thresholds for each of the household configurations, they also develop a weighted threshold. The low-income population map in this section is based on the household configurations and household income. It is representative of the population living in households with incomes that are less than 2 times the poverty threshold for their household income configuration. The table below shows the weighted average poverty threshold for the specified household size.

Household Size	2017	2018	2019	2020	2021
1	\$ 12,488	\$ 12,784	\$ 13,011	\$ 13,171	\$ 14,097
2	\$ 15,877	\$ 16,247	\$ 16,521	\$ 16,733	\$ 18,145
3	\$ 19,515	\$ 19,985	\$ 20,335	\$ 20,591	\$ 21,196
4	\$ 25,094	\$ 25,701	\$ 26,172	\$ 26,496	\$ 27,949
5	\$ 29,714	\$ 30,459	\$ 31,021	\$ 31,417	\$ 33,705
6	\$ 33,618	\$ 34,533	\$ 35,129	\$ 35,499	\$ 38,767
7	\$ 38,173	\$ 39,194	\$ 40,016	\$ 40,406	\$ 44,606
8	\$ 42,684	\$ 43,602	\$ 44,461	\$ 44,755	\$ 49,888
9+	\$ 50,681	\$ 51,393	\$ 52,875	\$ 53,905	\$ 60,012

Low Income Population



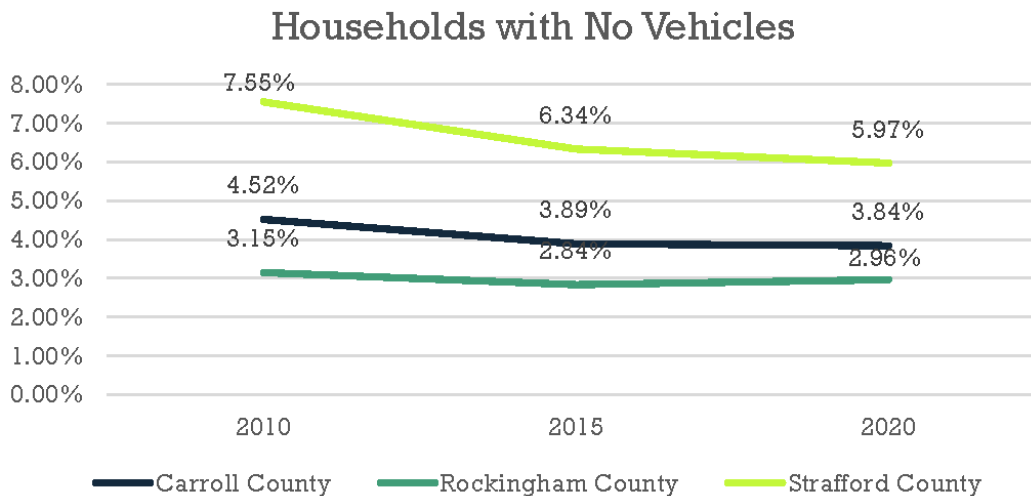
Source: US Census Bureau ACS. Year: 2020. Granularity: Counties, NH, Census Tracts.



Access to Vehicles

In rural areas, personal vehicles are a dominant form of transportation and transportation systems nationwide have historically been implemented with an assumption that most residents have access to a personal vehicle. The cost of housing in New Hampshire forces many to live outside urbanized areas where employment is concentrated. This often results in increased personal transportation costs and makes transit service more expensive and less efficient. When public transportation is not available, inconsistent access to a vehicle can still create difficulty in accessing housing, healthy food (including fresh produce), employment, education, and healthcare.

The data for this particular metric is very limited. The data was removed (as described in the Census Data Disclaimer) for almost all of the municipalities and tracts in the region. As a result, data for counties are available in the chart below and municipalities are in the table to the right.



Town	Households	Households with No Vehicles
Barrington	3,290	4.95%
Brookfield	274	1.82%
Dover	13,860	6.22%
Durham	3,206	6.92%
Farmington	2,815	4.69%
Lee	1,883	0.85%
Madbury	714	0.00%
Middleton	554	5.60%
Milton	1,707	4.04%
New Durham	983	1.93%
Newmarket	4,066	4.13%
Northwood	1,691	2.42%
Nottingham	1,967	1.93%
Rochester	13,151	6.36%
Rollinsford	1,036	10.14%
Somersworth	5,246	9.80%
Strafford	1,386	0.51%
Wakefield	2,202	1.23%
SRPC	60,031	5.42%
SEDD	52,307	5.75%
Carroll County	22,235	3.84%
Rockingham County	122,520	2.96%
Strafford County	49,831	5.97%

Source: US Census Bureau ACS. Year: 2010, 2015, 2020. Granularity: Counties, Municipalities, Census Tracts.

ACTIONS TO ENSURE AN EQUITABLE TRANSPORTATION DECISION MAKING PROCESS

EVENT/DECISION POINT	ISSUES/BARRIERS	SOLUTION/SUGGESTED ACTIONS
Public Meeting Noticing	<ul style="list-style-type: none"> • Does not reach all affected parties in community. • Primarily reaches population that is already involved in local concerns. • Not targeted to those who are directly affected. • LEP individuals or communities may not understand notices 	<ul style="list-style-type: none"> • Use Local Radio ads • Direct letters to residents, particularly for those who may not have access to or may not use technology. • Explore the use of a town or city emergency announcement messaging system if appropriate. This can be sent to all residents in the same way they get a parking ban alert or road construction alert. • In this increasingly digital age, many community residents get their local news solely through social media, town Facebook pages for instance. This can be used to get the word out to a much larger section of the population. • Many towns and cities have weekly or monthly newsletters to the community. Being prepared and having your meeting information ready to go when these go out would ensure a broader reach. • Use translation services to translate notices and information when it is deemed necessary.
Public Meeting Accommodations	<ul style="list-style-type: none"> • Lack of attendance • LEP • Transportation to meetings 	<ul style="list-style-type: none"> • Have a virtual alternative to in-person attendance at meetings. • Go out to the neighborhood that is affected, have an outdoor public meeting on their street or common gathering area if it exists. • Find a community champion, investigate if a community member would like to hold a meeting in their house or yard. • Engage members of local community, especially SRPC commissioners to be advocates of information on the project. • Hold meetings at varying times to accommodate differing schedules • Provide Childcare at meetings • Provide translation when necessary • Locate meetings on public transit routes to ensure access.

EVENT/DECISION POINT	ISSUES/BARRIERS	SOLUTION/SUGGESTED ACTIONS
Education	<ul style="list-style-type: none"> Lack of awareness of environmental affects Misunderstanding data LEP 	<ul style="list-style-type: none"> Find innovative ways to impart information, infographics, discussions, videos, social media, stories and testimonials to make the process and effects transparent and relatable. Use accessible language in all communications. Build interest and excitement or protest-MPO plays an objective role but stimulating discussion and engagement is necessary. Create translated materials for communities affected by understanding through data where this might occur.
Feedback Loop	<ul style="list-style-type: none"> Community gives time and effort and does not hear back on middle stages of process LEP 	<ul style="list-style-type: none"> Create a communications structure that prompts public updates every two weeks or month so that the community is kept informed as the process continues. EG. scheduled social media updates or e-mail updates. Create translated materials for communities affected by understanding through data where this might occur.
Meetings	<ul style="list-style-type: none"> People only engaged when there's a problem, or entity wants to build a project LEP 	<ul style="list-style-type: none"> Building relationships and identifying key people in the community to become involved in the process and be community advocates and conduits to information. Create translated materials or have a translator present at meetings for communities affected by understanding through data where this might occur.
Data Collection	<ul style="list-style-type: none"> Data collection is usually heavily based on quantitative analysis which doesn't represent the full picture of a geographic area or population. 	<ul style="list-style-type: none"> Shift to a mixed method approach to understand demographic, but also consider community perspectives. Use ground truthing to verify data.
Inclusive visioning and prioritization of equity	<ul style="list-style-type: none"> Projects are generally conceptualized by planners & engineers. This could be a more collaborative community process involving the community early on. LEP 	<ul style="list-style-type: none"> Investment early will bring positive returns and buy-in for a project. Involve the public/community at the conceptual stage of project development. Create translated materials for communities affected by understanding through data where this might occur.

PUBLIC PARTICIPATION PLAN

The [Strafford Public Participation Plan](#) documents the actions carried out by Strafford MPO to ensure that opportunities exist for the public to be involved in transportation planning activities, pursuant to Title 23 CFR 450.316 of Statewide Planning; Metropolitan Planning and Criteria and Procedures for Determining Conformity to State or Federal Implementation Plans of Transportation Plans, Programs and Projects; and Statewide Transportation Planning Rules. The Strafford MPO Public Participation Plan (PPP) was adopted by the Strafford MPO Policy Committee in November 2020. This document serves as the organization's main guide for implementing transportation policy and conducting project planning and development.

The PPP defines a process for providing people with reasonable opportunities to be involved in the metropolitan transportation planning process (23 CFR 450.316(a)). This includes community individuals, affected public agencies, representatives of public transportation employees, public ports, freight shippers, providers of freight transportation services, private providers of transportation (including intercity bus operators, employer-based commuting programs, such as carpool program, vanpool program, transit benefit program, parking cash-out program, shuttle program, or telework program), representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties.

As noted in other sections, SRPC commits to making planning activities available to all underrepresented communities and individuals using the methods mentioned above and in the PPP. SRPC continues to adapt and tailor its outreach activities to populations served. For example, in a recent study on climate equity, identifying persons not traditionally engaged in the planning process, SRPC attended an English as a Second Language (ESL) Civics class at Dover Adult Learning Center to understand the purview of recent immigrants, English learners, and younger students. Recognizing an underrepresented audience and accommodating those conversations is central to SRPC's Title VI mission.

LANGUAGE ASSISTANCE PLAN

SRPC takes steps to recognize and acknowledge opportunities for Limited English Proficiency (LEP) populations to be involved in decision making processes. This is consistent with Title VI of the Civil Rights Act of 1964, DOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000). Populations with LEP are shown in the map above.

Limited English Proficiency Four-Factor Analysis

USDOT guidance requires recipients of federal transportation funds to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. The starting point is an individualized assessment that balances the following four factors:

- The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee;
- The frequency with which LEP individuals come in contact with the program;
- The nature and importance of the program, activity, or service provided by the program to people's lives; and
- The resources available to the grantee/recipient or agency, and costs.

USDOT also recommends the following actions by MPOs and similar recipients of federal funds based on the in-area population of individuals with Limited English Proficiency.

SIZE OF LANGUAGE GROUP	RECOMMENDED PROVISION OF WRITTEN LANGUAGE ASSISTANCE
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents
More than 5% of the eligible population or beneficiaries and more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries and 50 or less in number	Translated written notice of right to receive free oral interpretation of documents.
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required.

According to the latest available data from the 2019 American Community Survey³, the total population of the SRPC region is 146,153 and the estimated number of people who spoke English “less than very well” was 2,829. That means an estimated 1.94% of the region can be categorized as LEP⁴. The ACS data show concentrations of LEP individuals in the urbanized cities of Dover, Rochester, and Somersworth (see LEP map above).

³ The 2020 Decennial Census did not include a question about language.

⁴ It is important to note that in many small, rural municipalities in the region, the ACS reports margins of error for LEP that are higher than the actual estimates for that municipality.

REGIONAL ESTIMATES FOR SPOKEN LANGUAGES			
Regional Population Estimate	Number of people who speak a language other than English	Number of people who speak English less than very well	Percent of people who speak English less than very well
146,153	9,457	2,829	1.94%
<i>Data from 2019 American Community Survey 5-year estimates (table S1601)</i>			

PEOPLE WHO SPEAK LANGUAGES OTHER THAN ENGLISH				
Language Spoken	Number of people	Percent	Number of people who speak English less than very well	Percent
Spanish	1,744	1.2%	480	0.3%
Other Indo-European languages	3,342	2.3%	601	0.41%
Asian and Pacific Island languages	3,584	2.5%	1,468	1.00%
Other languages	787	0.5%	280	0.19%
Total	9,457	6%	2,829	1.94%
<i>Data from 2019 American Community Survey 5-year estimates (table S1601)</i>				

According to the 2019 ACS data, over 1000 people who speak Asian and Pacific Island languages also fall into the category of LEP. This will require additional outreach to ensure translation includes the most commonly spoken languages other than English. SRPC is in the process of translating primary documents.

Without additional outreach, it is difficult to estimate the exact frequency with which LEP individuals encounter SRPC programs. However, these are the most likely situations in which an LEP person would encounter SRPC programs and materials:

- SRPC printed material – SRPC has not received any requests for service or accommodations for an individual for whom difficulty with English presented a barrier in communication and access to the program.
- SRPC website – SRPC has not received any requests for service or accommodations for an individual for whom difficulty with English presented a barrier in communication and access to the program.
- Telephonically – There are no known instances in which communications with an LEP individual has presented a barrier in communication and access to SRPC programs.
- On-site visit – there are no known instances in which communications with an LEP individual has presented a barrier in communication and access to the program.
- Public meeting or hearing – SRPC has not held any public meetings or hearings at which communications with an LEP individual has presented a barrier in communication and access to the program.

Given how critical transportation services are to the entire population, it is incumbent on SRPC to improve language accessibility to vital documents. The Metropolitan Transportation Plan and the Transportation Improvement Program influence infrastructure projects and other services that affect wide segments of the population. SRPC commits to ensuring that people with LEP will have equal access to meetings, information, and benefits as those whose first language is English. SRPC's website has built-in translation services for web content. SRPC is in the process of translating vital documents published on our website. SRPC will continue working to understand how to better include LEP residents by using demographic data and outreach to community leaders. There are translation services available in the region and, should they be needed, SRPC will seek the best resources possible.

Following the identification and selection of appropriate translation services, SRPC will include translation based on the ACS demographic data above for the following vital documents:

- MPO Notice to Title VI Beneficiaries
- MPO complaint procedures and Title VI Complaint form
- Overview of the MPO transportation planning process
- Executive summaries of primary planning documents
 - Unified Planning Work Program
 - Metropolitan Transportation Plan
 - Transportation Improvement Program

AFFIRMATIVE ACTION PROGRAM

SRPC adopts the [NHDOT's Disadvantaged Business Enterprise \(DBE\)](https://www.nh.gov/dot/org/administration/ofc/dbe_overview.htm) which can be found here: https://www.nh.gov/dot/org/administration/ofc/dbe_overview.htm

AMERICANS WITH DISABILITIES ACT

The Americans with Disabilities Act (ADA) of 1990 includes requirements regarding the involvement of persons with disabilities in the development and improvement of transportation services. The ADA includes provisions that ensure those with disabilities have accommodations included in transportation facility development, can access the sites where public participation activities occur and are guaranteed access to information and decisions available at those forums.

All SRPC meeting locations will be accessible to people of all abilities. Accommodations can be made for those that need it. SRPC attempts to hold all meetings and hearings at locations that are ADA accessible, as well as holding hybrid meetings so that those unable to attend physically can attend. In addition, SRPC has been involved in pedestrian mapping, and bicycle traffic stress mapping in the region. This information can be used to ensure maximum accessibility.

CASE STUDIES AND PROJECT EXAMPLES

i. Transportation Alternatives Project (TAP) Prioritization

TAP is a federal program that funds non-motorized transportation projects. NHDOT facilitates funding rounds regularly and municipalities and agencies propose projects to be funded. Not all of them can be funded and SRPC participates in the process of scoring and ranking projects by analyzing the ones from our region. SRPC staff developed a set of scoring criteria that awarded points to projects that improved bikeable and walkable networks to important community facilities (such as schools), especially in areas where factors like income or disability might make travel by vehicle difficult.

ii. MTP project evaluation

SRPC maintains a long-range transportation plan that includes projects to be developed and constructed over the next 20 years. Staff use demographic and computer mapping techniques to identify possible conflicts with important natural resources or disproportionate impacts to disadvantaged communities early in each project's development. Some projects have localized impacts to individual properties. Those are addressed on a case-by-case basis in coordination with NHDOT, but no project will move forward if it has broad negative impacts on people or the environment. As projects are developed and prepared for implementation, they are reviewed by SRPC committees and the

public at multiple stages. These are opportunities to enhance projects to maximize potential benefits or avoid potential negative impacts. People may review a project and suggest the addition of a bike lane or sidewalk to improve accessibility and safety for non-motorized users, recommend changes that would benefit public transit operations, or identify a previously unknown impact to a community or group of people. There are many such opportunities before a project begins any engineering or formal development.

iii. Dover Equity

Through the Building Coastal Resilience by Building Equity in Dover project, SRPC engaged in the following outreach techniques to communities that are not traditionally engaged in the planning process:

SRPC and partners held two focus groups (one via Zoom, one in person) at the Dover Adult Learning Center during an English for Different Language Speakers Civics class. The agenda and ensuing conversations focused on understanding the groups' experience with local climate impacts and preference for future engagement strategies.

SRPC and partners held a second outreach event with the Dover Housing Authority at Waldron Towers, focusing on the elderly citizen residents living there. The agenda included a poll and group discussion on how they get their news and their understanding of climate change its impact on their lives.

SRPC and partners held a third outreach event with the Dover Housing Authority's Family Self Sufficiency program. The agenda and ensuing discussion focused on homelessness needs and mental health needs within the City and how they will be exacerbated by climate change.

ANNUAL WORK PLAN AND REPORTS

ANNUAL WORK PLAN

SRPC reports yearly to NHDOT on compliance and progress towards its goals. The report below shows the goals set by SRP for Title VI compliance and the progress made towards each goal.

DOCUMENT	DESCRIPTION	INCLUSIONARY/OUTREACH ACTIONS
Strafford Regional Planning Commission Transportation Improvement Program and amendments	The Transportation Improvement Program identifies transportation projects that are programed to receive funding and lists federally funded and local projects.	<ul style="list-style-type: none"> • 30 day public comment period • Public hearing at Policy Committee meeting • Approval by the Strafford MPO • Web notice • Notice in local newspaper • Document components of comments and process
Strafford Metropolitan Planning Organization Public Participation Plan	The Public Participation Plan is the SMPOs official policy on involving the public in the transportation planning process.	<ul style="list-style-type: none"> • 45-day public comment period • Sent to libraries in area • Public hearing at Policy Committee • Approval by the Strafford MPO • Web notice • Notice in local newspaper • Document components of comments and process
Unified Planning Work Program (UPWP)	A document that incorporates all transportation planning and supporting comprehensive planning activities for two-year period	<ul style="list-style-type: none"> • 30-day public comment period • Public hearing at Policy Committee meeting • Approval by Policy Committee • Web notice • Notice in local newspaper • Sent to local libraries • Document components of comments and process

ANNUAL REPORT 2021

STRAFFORD REGIONAL PLANNING COMMISSION 2021 TITLE VI REPORT, OCTOBER 14TH, 2021	
Performance Measures and Indicators	Progress
<p>Complete a full update of Public Participation Plan including the performance measures and distribute/advertise the updated performance measures through SRPC's various media channels. This approach will enable us to track the implementation of our outreach strategies and assess their performance.</p>	<p>SRPC staff completed an update to our PPP in November 2020. We refined and elaborated upon previous performance measures, reformatted, and rewrote our plan including new virtual participation concepts, and further equity engagement strategies.</p> <p>It can be found here: <u>PPP</u></p>
<p>Solicit TAC members from communities that don't currently have representatives on the committee. Solicit new Policy Committee members as the terms of current members expire. Reach out to committee members in advance of meetings to increase meeting attendance rates. Meet with state representatives or their staffs to increase their awareness and understanding of the MPO's work and objectives.</p>	<p>We reach out to all communities annually to solicit new TAC members and confirm existing members, and reach out to all communities to reappoint Policy members or appoint new ones as their terms expire.</p> <p>In FY 2021, eight individuals were appointed or re-appointed to the Policy Committee. Transportation Planner Colin Lentz reached out prior to each meeting to track attendance and ensure a quorum.</p> <p>SRPC holds a weekly economic development call that is regularly attended by Senator Shaheen and Senator Hassan staff members. This updates the senator's representative on SRPC's program and regional priorities.</p> <p>SRPC staff engaged with staff with the NHDOT bureau of the Environment to expand consideration of potential environmental impacts from planned projects updated in the Metropolitan Transportation Plan.</p> <p>SRPC staff met with Congressman Pappas on February 11, 2021, and Senator Sheehan's staff on February 16, 2021, to talk about regional planning and transportation issues.</p>

<p>Contact community organizations serving under-represented populations for advice on how to best reach these groups.</p>	<p>SRPC participates in periodic meetings with Community Action Partnership and Strafford County Homeless Shelter Coalition, and we are consistently learning how to communicate with under-served populations.</p> <p>SRPC held a meeting with <u>Indigenous New Hampshire</u> in March 2021 to explore how priorities and projects can intersect and how we can collaborate.</p>
<p>Continue to upload the monthly minors and amendments to the website once the executive director approves them and the Executive Committee concurs.</p>	<p>The current 2021-2024 TIP was adopted March 19, 2021. Amendment 1 was adopted on June 18 2021, and Minors approved in every month except October. http://strafford.org/2021/10/05/srpc-tip-amendment-2-is-available-for-public-comment/</p>
<p>Continue to upload the annual Title VI reports to the Strafford MPO website. Continue to host the Assurance of Non-Discrimination Notice on the Strafford MPO website.</p>	<p>The Title VI Report is uploaded annually to the SRPC website and can be found here: http://strafford.org/uploads/documents/governance/titlevi_final_2013.pdf</p> <p>SRPC's standard assurances are located here: http://strafford.org/uploads/documents/governance/standardassurances_fy2022.pdf</p> <p>**Please note SRPC is performing an update to the Title VI program in FY 2022</p>
<p>Identify new trainings, webinars, and opportunities to improve public outreach strategies. Identify trainings with a focus on equity. Attend at least five.</p>	<p>SRPC staff attended multiple trainings and information sessions including:</p> <ul style="list-style-type: none"> • Meeting People Where They Are: Tools for Engaging your Community this Summer & Fall • Racial Disparities and COVID-19 • Enhancing Opportunities for Socially Vulnerable Populations • UNH Resiliency Academy • Awakening to Racism as a Public Health Issue (Black Thought Series) • Using Law and Policy to Create Equitable Communities • NHBSR Equity Discussion • Virtual Local Solutions: Climate Preparedness Communities of Practice for Transportation • Electric Vehicle Charging Meeting • NEARC Mapping Inequality Workshop • FHWA VPI Webinar: Engaging Traditionally Underserved Communities using Virtual Public Involvement • Dover Equity Project, Equity Training • Energy Opportunities in the Granite State

<p>Find a way to present statistics for low-income and minority populations that most accurately reflects the information in the region.</p>	<p>SRPC created an online data dashboard which will be continually updated. It creates a visual and accessible way for the public to see relevant data and for staff to be able to communicate it easily. http://strafford.org/measure/data-snapshot/</p>
<p>Continue to post meeting and event notices in a variety of locations. Give the advanced notice required and, if possible, additional time. Continue to list on the Strafford MPO website all comments and responses received during different documents' public comment periods. List recorded comments in an appendix to each published document. Continue to share transportation news in our weekly update, Bits and Pieces, and in our monthly newsletter. Continue to use social media channels to keep public informed.</p>	<p>SRPC uses Twitter, Facebook and Instagram to stay current on trending transportation planning topics and to provide followers with updated planning information.</p> <p>Each social media platform enables staff members to share surveys, photos, information, publications, and meeting dates; Strafford MPO uses YouTube to host videos of Transportation Advisory Committee and Policy Committee meetings.</p> <p>Videos of select Strafford meetings have been uploaded, and the organization plans to upload all TAC and Policy Committee meeting videos in FY 2022.</p> <p>Even with the return to in-person meetings, SRPC continues to host a hybrid model of all public meetings so that as many people can attend as possible.</p> <p>Strafford MPO relies heavily on email marketing software, Constant Contact. This program enables Strafford MPO to create targeted contact lists of transportation stakeholders and send e-communications such as press releases, surveys, newsletters, weekly updates, meeting materials, and other communications.</p>
<p>Continue to be involved and up to date with the public transit system.</p>	<p>SRPC staff participate on the COAST board of directors, including its Legislative Outreach and Finance sub-committees.</p> <p>SRPC staff also participate on the board and executive committee of the Alliance for Community Transportation which coordinates demand response transportation in the region.</p> <p>SRPC staff collaborated with public transit providers in the development of a joint land use study for the Portsmouth Naval Shipyard.</p>

RESOURCES AND REFERENCES:

<https://www.justice.gov/crt/fcs/newsletter/Spring-2015/TitleVIandEJ>

<https://www.epa.gov/environmentaljustice/title-vi-and-environmental-justice>

http://strafford.org/uploads/documents/governance/difference_btwn_ejand_titlevi_2013.pdf

<http://strafford.org/engage/civil-rights/>

<https://www.nh.gov/dot/org/administration/ofc/documents/ada-titleII-transition-plan.pdf>

<https://www.nh.gov/dot/org/administration/ofc/index.htm>

ENVIRONMENTAL JUSTICE

SRPC works to achieve the purpose of Title VI of the Civil Rights Act through an inclusive, transparent process and active outreach throughout the region. SRPC also has a responsibility to ensure that actions arising from its decisions do not have “disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.” This responsibility was first described in Executive Order 12898 from 1994, and extends to all federal agencies. Planning efforts and decisions by Strafford MPO result in changes to the transportation system; those changes should not result in disproportionate adverse impacts in minority or low-income communities.

Transportation projects are a common outcome of Strafford MPO’s planning efforts. Construction of such projects can have significant temporary or permanent impacts on a community; they can be negative or beneficial. Examples of impacts are listed in the table below. To fulfill its responsibility under Executive Order 12898, SRPC follows three environmental justice (EJ) principles established by USDOT:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
- To ensure the full and fair participation by all potentially affected communities in the transportation decision making process.
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

POPULATIONS FOR EJ FOCUS

Executive Order 12898 specifies minority and low-income populations, but additional demographic categories are relevant to EJ and are valuable for avoiding disproportionate impacts and ensuring equitable benefits from transportation planning:

- Minority (race and ethnicity)
- Age
- Low Vehicle access
- Households in poverty
- Limited English Proficiency
- Persons with disabilities

POTENTIAL TEMPORARY AND PERMANENT NEGATIVE IMPACTS FROM TRANSPORTATION PLANNING AND PROJECTS

Bodily impairment, infirmity, illness, or death

Air, noise, and water pollution and soil contamination

Destruction or disruption of man-made or natural resources

Destruction or diminution of aesthetic values

Destruction or disruption of community cohesion or a community's economic vitality

Destruction or disruption of the availability of public and private facilities and services

Vibration

Adverse employment effects

Displacement of persons, businesses, farms, or non-profit organizations

Increased traffic congestion, isolation, exclusion, or separation of individuals within a given community or from the broader community

Denial of, reduction in, or significant delay if the receipt of benefits of USDOT programs, policies, or activities.

POTENTIAL BENEFITS FROM TRANSPORTATION PLANNING AND PROJECTS

Decrease in travel time

Improved air quality

Expanded employment opportunities

Better access to transit options and alternative modes of transportation (walking and bicycling)

Improved safety for users

HOW WILL SRPC ENSURE POTENTIAL IMPACTS AND BENEFITS ARE EQUITABLE?

SRPC works to ensure that the benefits of transportation improvements are equitably distributed throughout communities in the region. SRPC uses census and other demographic data to identify census tracts that contain concentrations of vulnerable

populations. This information is used during the early planning stage of transportation projects to avoid potential impacts by develop and considering alternatives.

Maps below show where projects in the SRPC region are located relative to EJ populations. This information is used to ensure projects are implemented in consideration of EJ impacts.

MAJOR PROJECTS WITH LIKELY EJ IMPACTS

There are several projects in Strafford MPO's Metropolitan Transportation Plan that are in the planning phase that will need EJ analysis and considerations moving forward:

Spaulding Turnpike Exit 10 study

Starting in 2024, a planning study will be conducted to examine improved connections to the Spaulding Turnpike (NH16) in the vicinity of Rochester, Somersworth, and Dover. This will be a collaborative effort between the municipalities, SRPC, and NHDOT. Studies like this commonly result in transportation improvement projects with a range of potential impacts and benefits that require consideration of EJ populations.

Rail siding (increase train traffic and emissions)

Short sections of train tracks running in parallel to the main line are known as "siding" and they allow multiple trains to pass each other and increase the efficiency and capacity of freight and passenger rail service. SRPC and the Northern New England Passenger Rail Authority (NNEPRA) have identified locations for additional siding. There is not a firm potential date for construction. Improving rail service can lead to major benefits to a region, but it can also mean negative impacts to people who live along the tracks.

Amtrak rail stop in Newmarket

The Town of Newmarket has expressed interest in constructing a new passenger rail stop along the Amtrak Downeaster line. Several improvements to the whole line are required before the Downeaster can add more capacity and accommodate a new stop. Regardless, potential impacts to neighborhoods adjacent to candidate sites for the new stop will need to be carefully considered.

PROJECTS WITH DIRECT AND INDIRECT EJ BENEFITS

Several projects in the region that are in the planning or engineering stages, will have positive benefits for EJ populations. Many of the projects would have direct benefits (such as pedestrian improvements in neighborhoods or community-wide economic development), or indirect benefits (such as improvements to the regional transit services)

New COAST Operations Facility

The Cooperative Alliance for Seacoast Transportation (COAST) is planning a new facility which will improve operations and maintenance of the bus fleet and house administrative staff at the same location. A consultant is designing and engineering the facility and COAST is securing federal, state, and local funding.

University of New Hampshire Transit – Transition to Electric Fleet

UNH is regional leader in alternative and sustainable energy. Their Transit fleet is made up of B20 biodiesel and natural gas buses and they have actively begun the transition to an electric fleet. While public transit decreases emissions overall, diesel buses are still a source of air pollution. Transit often directly serves areas with EJ populations, causing disproportionate impacts on local air quality.

Transit Signal Prioritization

Upgrading traffic signals in communities served by fixed route bus would improve on-time performance, which has been shown to increase ridership. This project has been planned in the City of Dover, but funding has yet to be programmed.

Dover, Somersworth, Rochester - NH108 Complete Streets

Beginning in fall of 2024, the NH108 corridor between Weeks Crossing in Dover, and Innovation Drive at the Skyhaven Airport in Rochester will be upgraded using a complete streets approach. Final design has not been completed, but the route will likely include a combination of new multi-use paths, bike lanes, and sidewalks, improved transit facilities, and improved business access. The project is designed to balance pedestrian and vehicular accessibility while facilitating economic development.

Farmington sidewalks

The Statewide Ten Year Plan includes funding for two new lengths of sidewalk in Farmington. The new sidewalks will connect neighborhoods to the downtown. Pedestrian improvements are important in Farmington as many local children walk through the downtown to reach local schools and downtown revitalization is a priority for the town.

Somersworth Main St complete streets

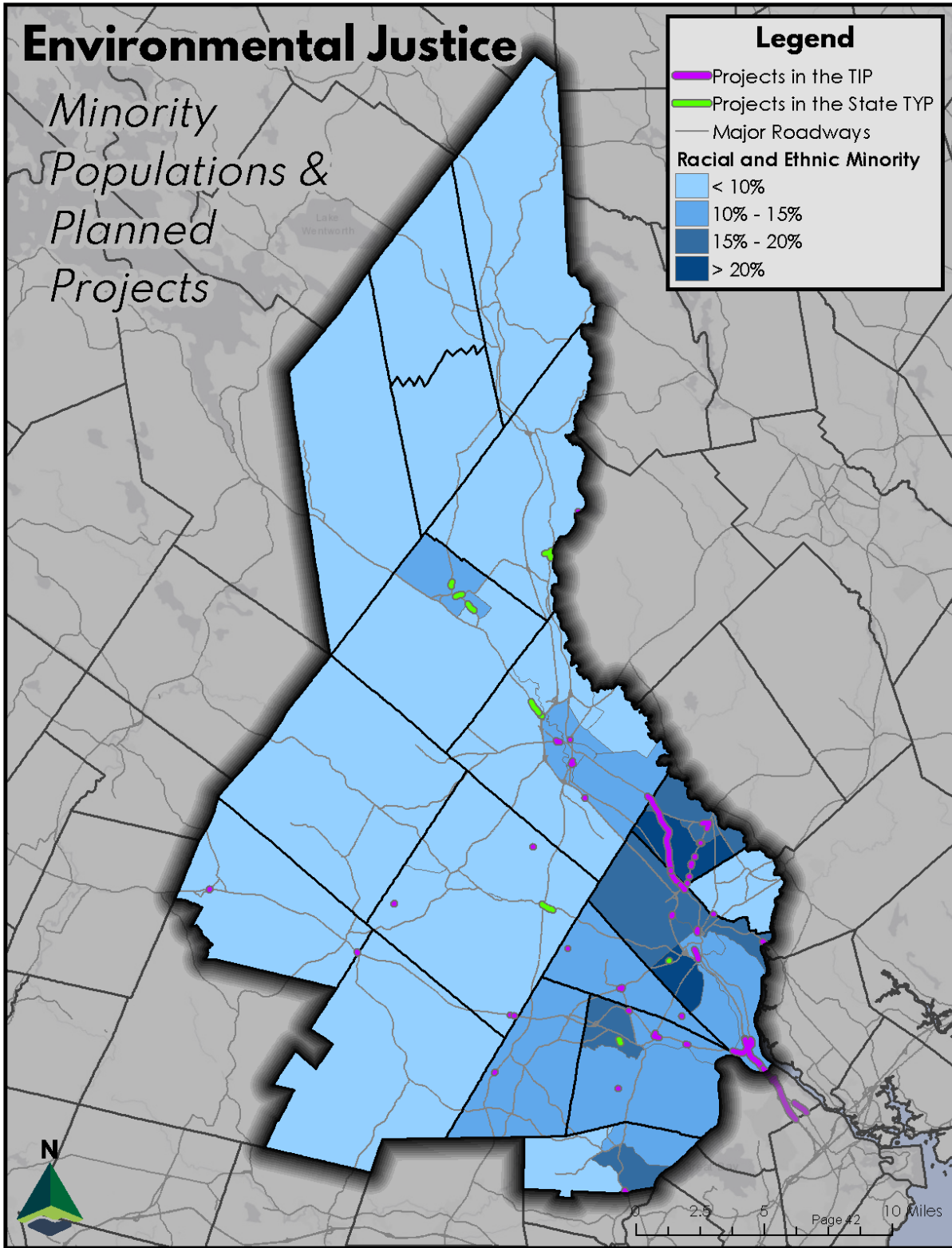
The City of Somersworth has a thriving local economy and plenty of space for continued revitalization of underutilized spaces in the downtown. Main St parallels the Salmon Falls River, and active freight rail line, and historic mill buildings. SRPC is a partner with Somersworth in planning complete streets type improvements along Main St for future funding opportunities.

Rochester Nashoba Drive signal

Rochester has begun planning and design of upgrades to the NH11 corridor between the Granite Ridge Mall and Exit 15 on the Spaulding Turnpike (NH16). Part of the upgrades will be a new signal and pedestrian facilities at the intersection with Nashoba Drive. The intersection is currently unsignalized and is the only access point for a large, manufactured home park called Cocheco Estates. The signal will improve safety and access, and new sidewalks will extend to shopping at the Granite Ridge and eventually all the way to downtown.

Environmental Justice

Minority Populations & Planned Projects



Environmental Justice

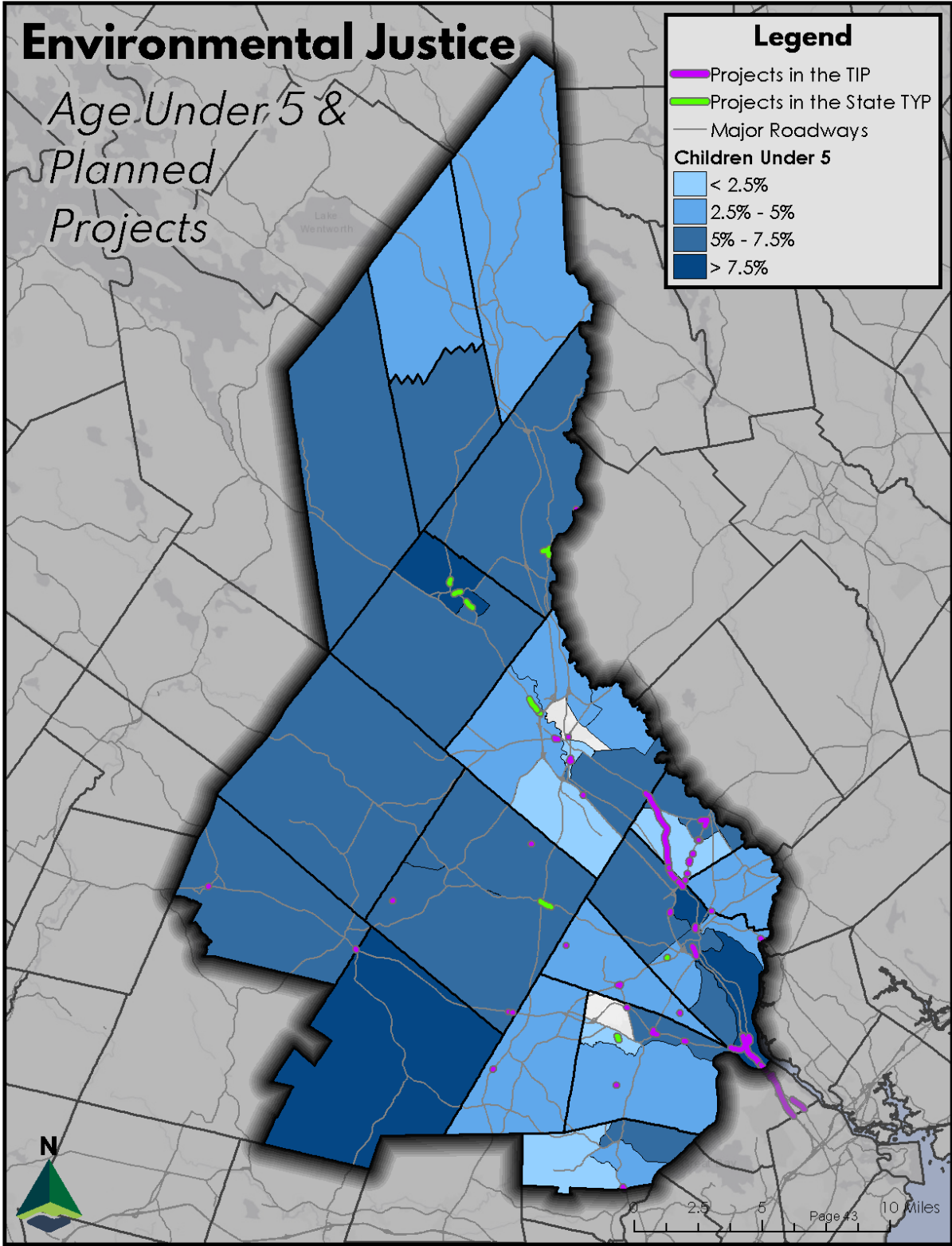
*Age Under 5 &
Planned
Projects*

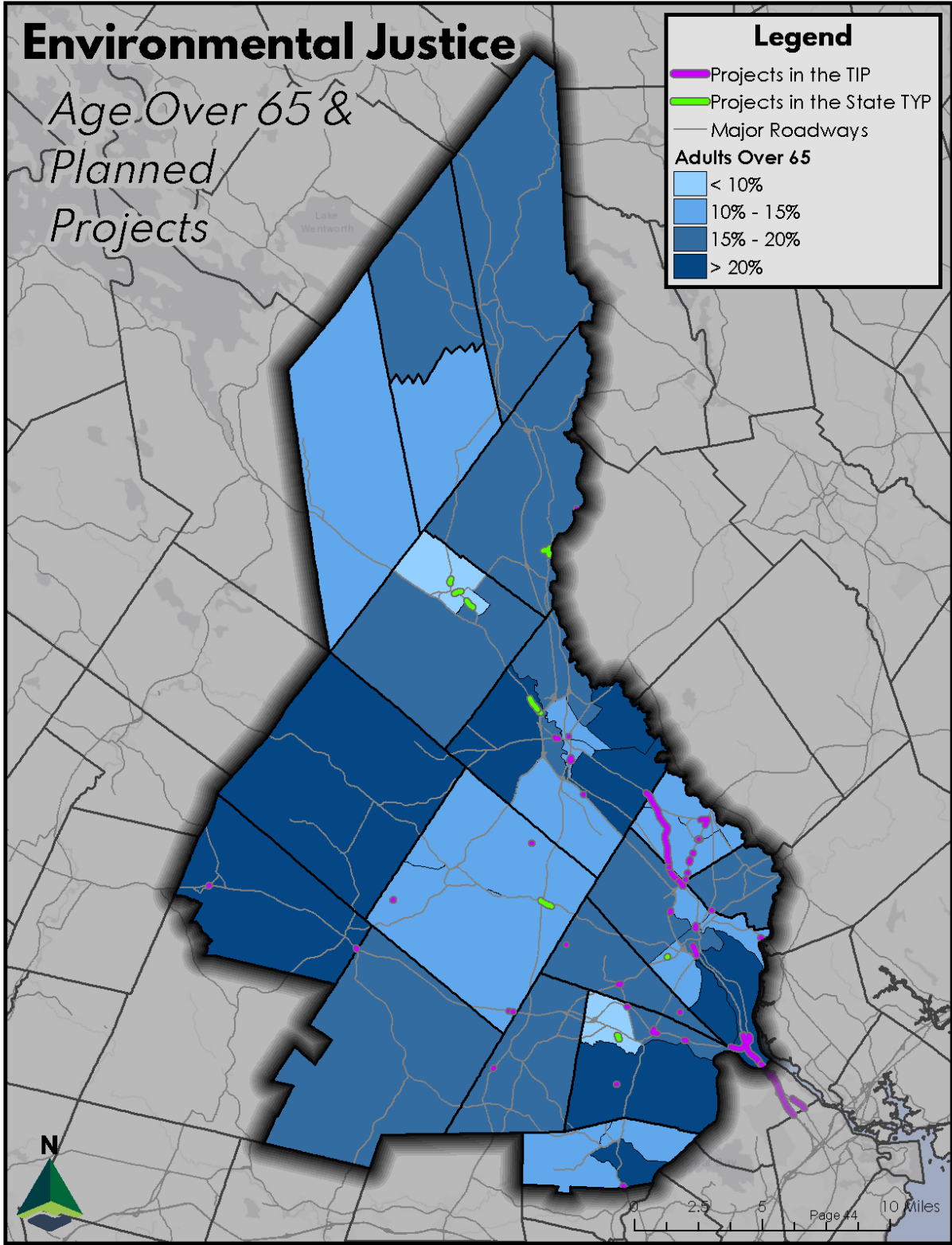
Legend

- Projects in the TIP
- Projects in the State TYP
- Major Roadways

Children Under 5

- < 2.5%
- 2.5% - 5%
- 5% - 7.5%
- > 7.5%



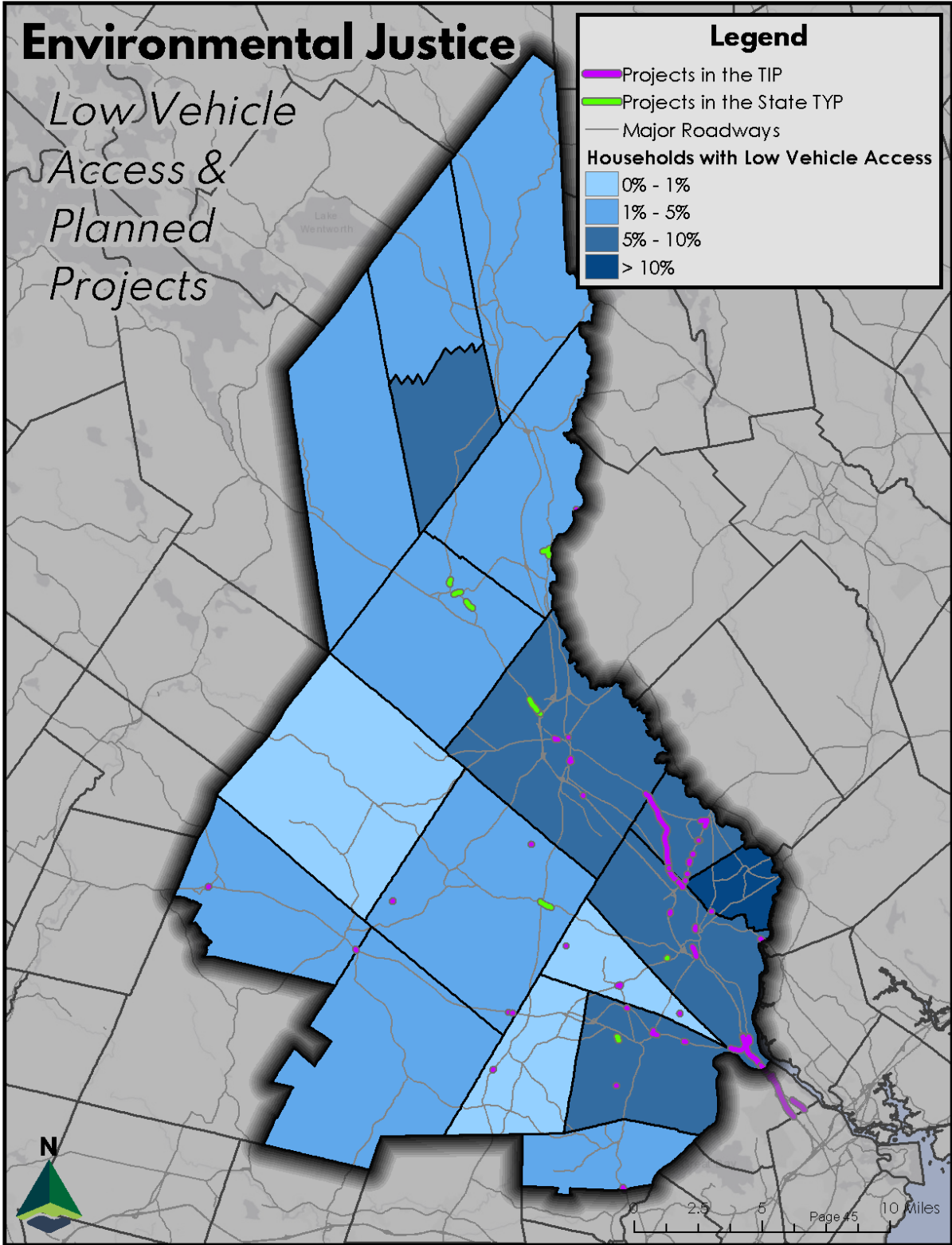


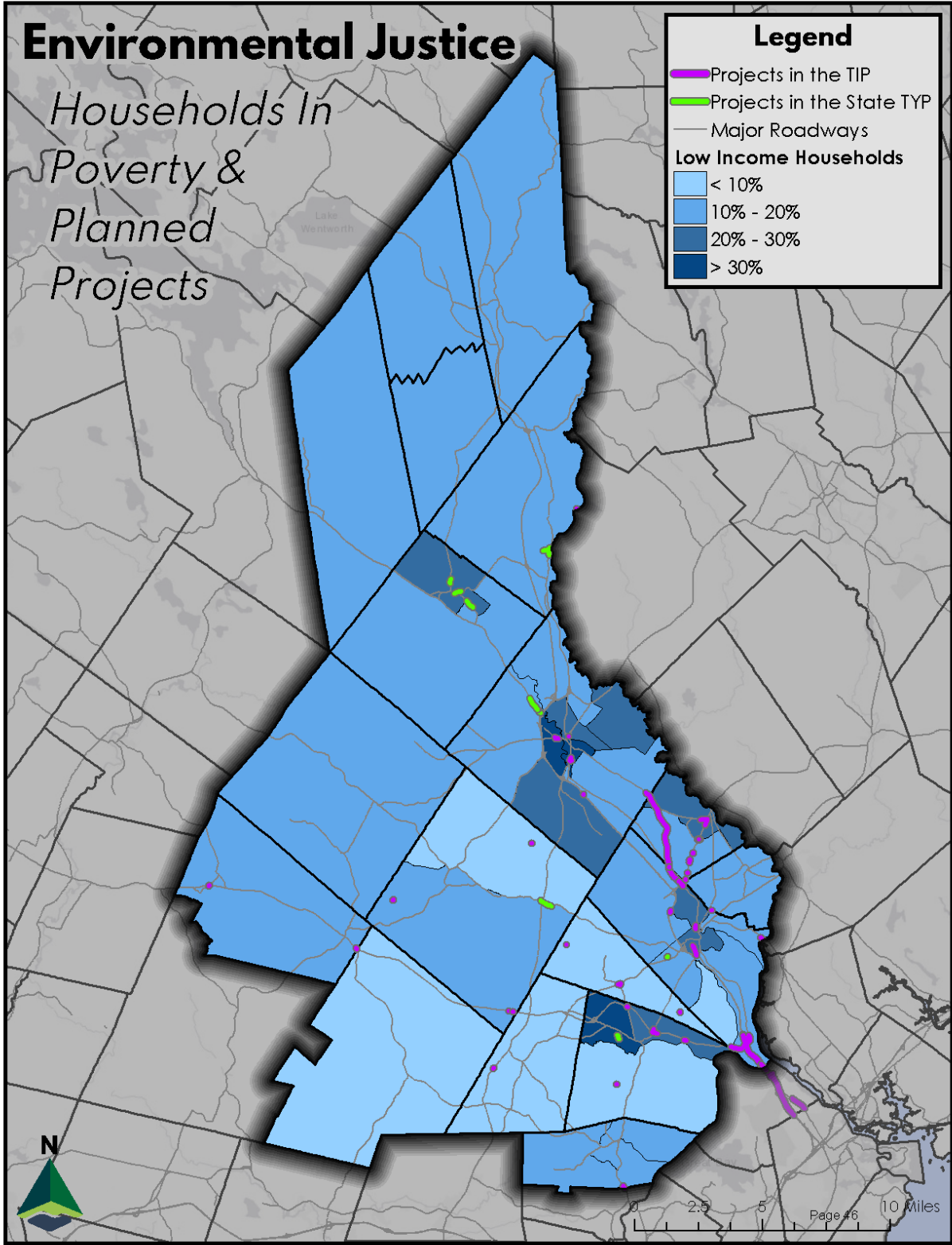
Environmental Justice

Low Vehicle Access & Planned Projects

Legend

- Projects in the TIP
- Projects in the State TYP
- Major Roadways
- Households with Low Vehicle Access**
 - 0% - 1%
 - 1% - 5%
 - 5% - 10%
 - > 10%



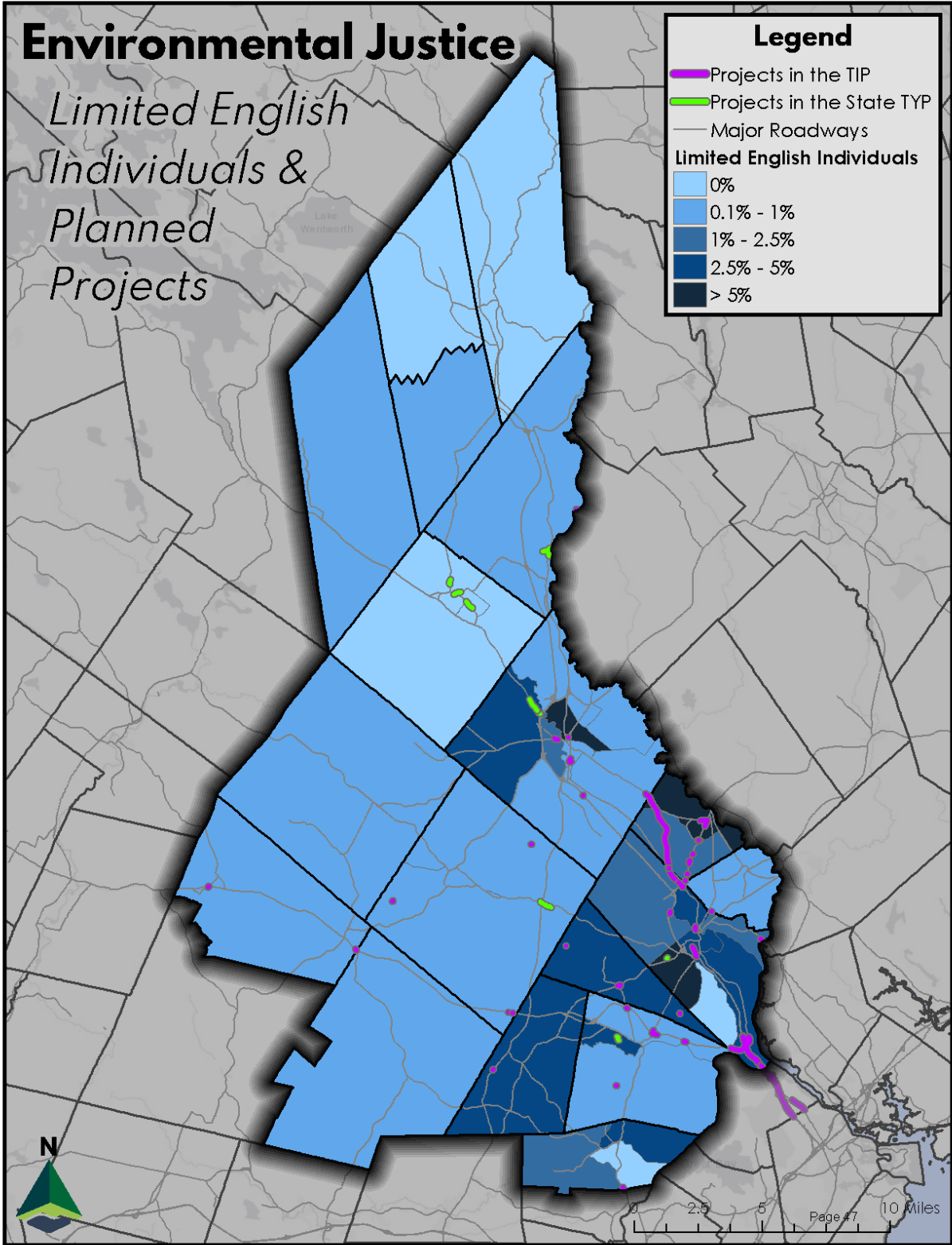


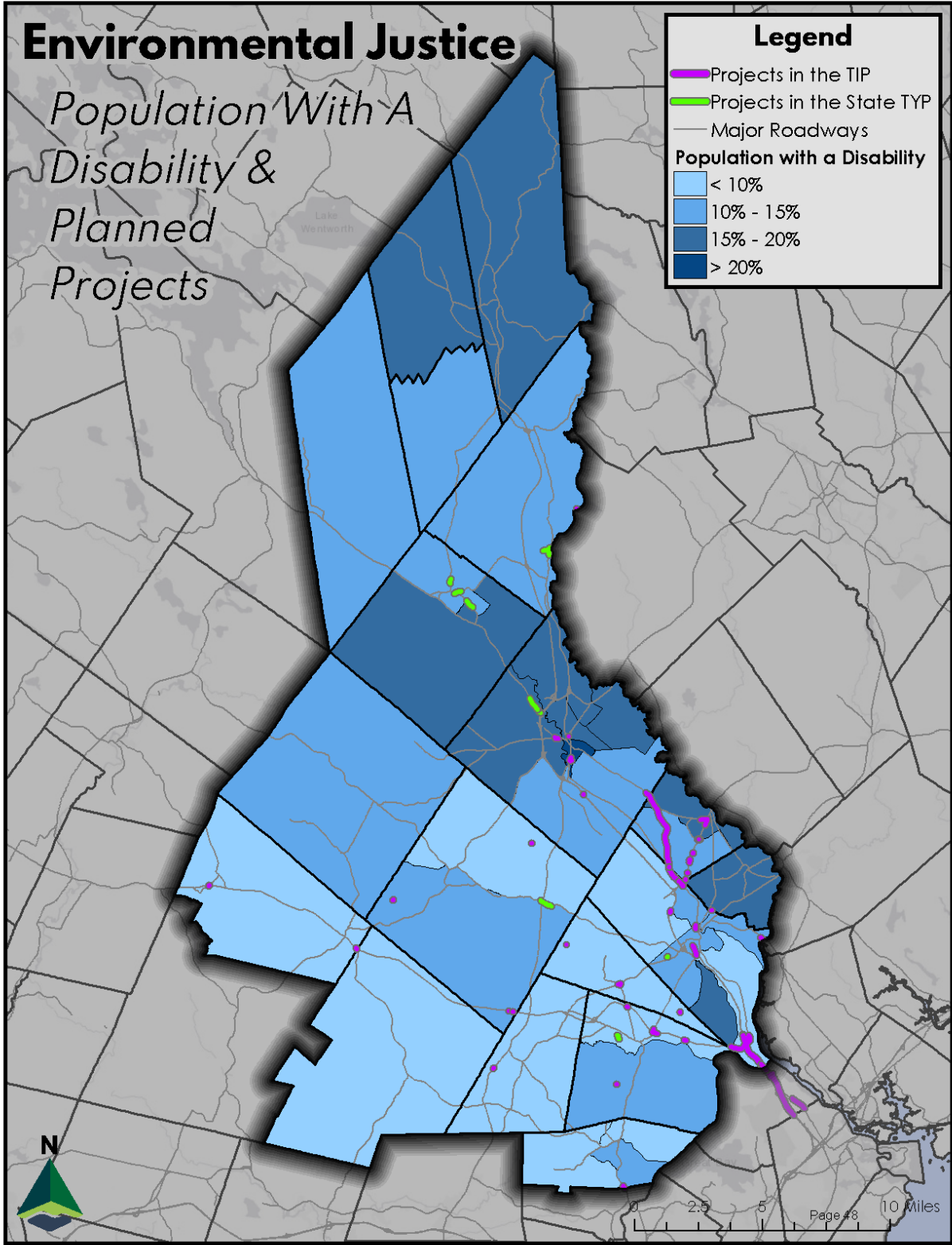
Environmental Justice

Limited English
Individuals &
Planned
Projects

Legend

- Projects in the TIP
- Projects in the State TYP
- Major Roadways
- Limited English Individuals**
 - 0%
 - 0.1% - 1%
 - 1% - 2.5%
 - 2.5% - 5%
 - > 5%





APPENDICES:

TITLE VI NOTICE TO THE PUBLIC



Strafford Regional Planning Commission Title VI Notice to Public

The Strafford Regional Planning Commission hereby gives public notice of its policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities. Title VI and related statutes require that no person in the United States of America shall, on the grounds of race, color, national origin, or sex be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program receiving Federal assistance.

Any person who believes they have been aggrieved by an unlawful discriminatory practice regarding the Strafford Regional Planning Commission transportation programs has a right to file a formal complaint with the Planning Commission. Any such complaint must be in writing and submitted to the SMPO Title VI Coordinator within one hundred eighty (180) days following the date of the alleged occurrence. For more information regarding civil rights complaints, please contact:

Colin Lentz
Title VI Coordinator
Strafford Regional Planning Commission
150 Wakefield Street ~ Suite 12
Rochester, NH 03867

(603) 994-3500 (ext. 102)
TDD/TTY Access: (800) 735-2964

STRAFFORD REGIONAL PLANNING COMMISSION

150 Wakefield Street, Suite 12, Rochester, NH 03867

Barrington | Brookfield | Dover | Durham | Farmington | Lee | Madbury | Middleton | Milton | New Durham
Newmarket | Northwood | Nottingham | Rochester | Rollinsford | Somersworth | Strafford | Wakefield



TITLE VI CERTIFICATIONS AND ASSURANCES

The United States Department of Transportation (USDOT) Standard Title VI/Non-Discrimination

Assurances

DOT Order No. 1050.2A

The Stafford Regional Planning Commission (herein referred to as the "Recipient"), **HEREBY AGREES THAT**, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through Federal Highway Administration (FHWA), is subject to and will comply with the following:

Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled Non-discrimination In Federally-Assisted Programs Of The Department Of Transportation-Effectuation Of Title VI Of The Civil Rights Act Of 1964);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

General Assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure that:

"No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, for which the Recipient receives Federal financial assistance from DOT, including the FHWA.

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Non-discrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these non-discrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

Specific Assurances

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its Federally assisted Highway Program:

1. The Recipient agrees that each "activity," "facility," or "program," as defined in §§ 21.23(b) and 21.23(e) of 49 C.F.R. § 21 will be (with regard to an "activity") facilitated, or will be (with regard

to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.

2. The Recipient will insert the following notification in all solicitations for bids, Requests For Proposals for work, or material subject to the Acts and the Regulations made in connection with all Federal-Aid Highway Program activities and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

"The Strafford Regional Planning Commission in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award."

3. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
 - a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
 - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.
8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:

- a. the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
 - b. the period during which the Recipient retains ownership or possession of the property.
9. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.


By signing this ASSURANCE, Strafford Regional Planning Commission also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the FHWA and USDOT access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the FHWA and USDOT. You must keep records, reports, and submit the material for review upon request to FHWA and USDOT, or its designee in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

Strafford Regional Planning Commission gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the Federal Aid Highway Program. This ASSURANCE is binding on New Hampshire, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the Federal Aid Highway Program. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

Jennifer L. Czysz, AICP

(Name of Recipient)

by



(Signature of Authorized Official)

DATED June 3, 2021

Standard Assurances APPENDIX A

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

1. **Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, FHWA, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
2. **Non-discrimination:** The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. **Solicitations for Subcontracts, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to Non-discrimination on the grounds of race, color, or national origin.
4. **Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the FHWA to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the FHWA, as appropriate, and will set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of a contractor's noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the FHWA may determine to be appropriate, including, but not limited to:
 - a. withholding payments to the contractor under the contract until the contractor complies; and/or
 - b. cancelling, terminating, or suspending a contract, in whole or in part.
6. **Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or the FHWA may direct as a means of enforcing such provisions including sanctions for

noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

Standard Assurances APPENDIX B

CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

The following clauses will be included in deeds effecting or recording the transfer of real property, structures, or improvements thereon, or granting interest therein from the United States pursuant to the provisions of Assurance 4:

NOW, THEREFORE, the U.S. Department of Transportation as authorized by law and upon the condition that the Strafford Regional Planning Commission will accept title to the lands and maintain the project constructed thereon in accordance with 23 U.S. Code § 107, the Regulations for the Administration of the Federal Aid Highway Program, and the policies and procedures prescribed by the FHWA of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the Strafford Regional Planning Commission all the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit A attached hereto and made a part hereof.

(HABENDUM CLAUSE)

TO HAVE AND TO HOLD said lands and interests therein unto Strafford Regional Planning Commission and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on the Strafford Regional Planning Commission, its successors and assigns.

The Strafford Regional Planning Commission, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [,] [and]* (2) that the Strafford Regional Planning Commission will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended [,] and (3) that in the event of breach of any of the above-mentioned non-discrimination conditions, the Department will have a right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction].*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to make clear the purpose of Title VI.)

Standard Assurances APPENDIX C

**CLAUSES FOR TRANSFER OF REAL PROPERTY ACQUIRED OR IMPROVED UNDER THE ACTIVITY,
FACILITY, OR PROGRAM**

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the Strafford Regional Planning Commission pursuant to the provisions of Assurance 7(a):

- A. The (grantee, lessee, permittee, etc. as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that:
 - 1. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.
- B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Non-discrimination covenants, Strafford Regional Planning Commission will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.*
- C. With respect to a deed, in the event of breach of any of the above Non-discrimination covenants, the Strafford Regional Planning Commission will have the right to enter or re-enter the lands and facilities thereon, and the above described lands and facilities will there upon revert to and vest in and become the absolute property of the Strafford Regional Planning Commission and its assigns.*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

Standard Assurances APPENDIX D

**CLAUSES FOR CONSTRUCTION/USE/ACCESS TO REAL PROPERTY ACQUIRED UNDER THE ACTIVITY,
FACILITY OR PROGRAM**

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by Stafford Regional Planning Commission pursuant to the provisions of Assurance 7(b):

- A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, "as a covenant running with the land") that (1) no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.
- B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Non-discrimination covenants, Stafford Regional Planning Commission will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.*
- C. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, Stafford Regional Planning Commission will there upon revert to and vest in and become the absolute property of Stafford Regional Planning Commission and its assigns.*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

Standard Assurances APPENDIX E

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees to comply with the following non-discrimination statutes and authorities; including but not limited to:

Pertinent Non-Discrimination Authorities:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 et seq.), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 et seq.), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures Non-discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of Limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 et seq).

TITLE VI COMPLAINT FORM



Title VI Complaint Form

The purpose of Title VI is to ensure that no person in the United States shall, on the grounds of race, color, creed or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance from the U.S. Department of Transportation. Later statutes extended the scope of Title VI to include prohibitions against discrimination on the basis of age, sex, and disability.

The program enables the New Hampshire Department of Transportation (NH DOT) and sub-recipients to comply with requirements contained in the Title VI regulations issued by the U.S. Department of Justice (DOJ) (28 CFR Part 42, Subpart F) and the U.S. Department of Transportation (DOT) (49 CFR Part 21), and to administer programs, policies, and activities in a manner that is consistent with the DOT Order on Environmental Justice (Order 5610.2) and the DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (70 FR 74087, December 14, 2005).

If you wish to file a complaint, please complete the form and explain as clearly as possible what happened and why you believe you were discriminated against.

Section I:		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
E-Mail Address:		
Section II:		
Are you filing this complaint on your own behalf?	Yes*	No
*If you answered "yes" to this question, go to Section III.		
If not, please supply the name and relationship of the person for whom you are complaining:		
Please explain why you have filed for a third party: _____		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	Yes	No
Section III:		
<i>I believe the discrimination I experienced was based on (check all that apply):</i>		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin
Date of Alleged Discrimination (Month, Day, Year): _____		

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

Section IV:

Have you previously filed a Title VI complaint with this agency?	Yes	No
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Section V:

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

Yes No

If yes, check all that apply:

Federal Agency: _____

Federal Court _____ State Agency _____

State Court _____ Local Agency _____

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

Name: _____

Title: _____

Agency: _____

Address: _____

Telephone: _____

Section VI:

Name of agency complaint is against: _____

Contact person: _____

Title: _____

Telephone number: _____

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

Signature and date required below.

Signature Date

Please submit this form to: Laurie Ridenour-Patterson at Laurie.L.Ridenour-Patterson@dot.nh.gov or NHDOT PO Box 483, Concord, NH 03302-0483 or contact via telephone at 603-271-2467