

City of Montpelier, Vermont

Title VI, Environmental Justice, and Non-Discrimination Plan

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I. Notification of Title VI Protections

The City of Montpelier has established the following notice to the public regarding Title VI protections:

NOTIFICATION OF YOUR CIVIL RIGHTS

The City of Montpelier operates its programs and services without regard to race, color, and national origin as stipulated in Title VI of the Civil Rights Act of 1964. If you feel you have been discriminated against based on your race, color, or national origin, you may file a complaint with the City of Montpelier by calling 802-223-9502 or by calling the Vermont Agency of Transportation, Office of Civil Rights at 802-828-5858 and stating that you would like to make a Title VI complaint. If you would like more information about your Title VI rights, please visit <http://vtranscivilrights.vermont.gov> or call (802) 828-5561.

This notice is included in the City's website at the following URL: <https://www.montpelier-vt.org/889/Disadvantaged-Business-Enterprise-Progra>. The notice is also posted in two prominent locations at City Hall: in the City Clerk's office and in the City Manager's office. Once the proposed intermodal transit facility is built, the notice will also be posted there.

II. Title VI Complaint Procedures and Form

Any person who believes that she or he has been excluded from participation in, denied benefits or services of any program or activity administered by City of Montpelier or its sub-recipients, consultants, and contractors on the basis of race, color, national origin (including Limited English Proficiency), sex, age, or disability may bring forth a complaint of discrimination under Title VI/EJ and related statutes. The procedures for filing such a complaint are described below.

The City Manager has overall responsibility for these discrimination complaint procedures. Any City of Montpelier employees who receive a verbal or written Title VI complaint must contact the City Manager immediately. The City Manager may, at her/his discretion, assign a person within City government to investigate the complaint. The designated investigator will conduct an impartial and objective investigation, collect factual information and prepare a fact-finding report based upon the information obtained from the investigation.

Complaints must be in writing, and must be signed by the complainant and/or the complainant's representative. In cases where the complainant is incapable of providing a written statement, the complainant will be assisted in converting the verbal complaint into a written complaint. All complaints, however, must be signed by the complainant or by the complainant's representative.

The complaint must set forth as fully as possible the facts and circumstances surrounding the claimed discrimination. The complainant shall make him- or herself reasonably available to the designated investigator, to ensure completion of the investigation.

Complaints must be filed no later than 180 days after:

- The date of the alleged act of discrimination; or

- The date the person became aware of the alleged discrimination; or
- Where there has been a continuing course of discriminatory conduct, the date on which the conduct was discontinued.

Use of the Complaint Form is not required for the complainant. Rather, it is intended to help the complainant provide enough information to begin processing the complaint.

The complaint shall be investigated, unless:

- The complaint is withdrawn;
- The complainant fails to provide required information;
- The complaint is filed beyond the 180-day timeframe;
- The complainant is not part of a protected group; or
- The complaint is determined to be more appropriately reviewed under a jurisdiction other than City of Montpelier. If this is the case, the complainant will be directed to the appropriate agency.

Upon determination that the complaint warrants a City of Montpelier investigation, the complainant is sent a letter, acknowledging receipt of the complaint, and giving the name of the investigator. The respondent – the person alleged to have committed the discrimination -- is notified by mail that s/he has been named in a complaint. The letter also includes the investigator’s name and informs the respondent that s/he will be contacted for an interview. The complaint will be logged in a database that allows for the tracking of complaint details and outcomes of the investigation.

The investigator shall prepare a written plan, which includes, but is not limited to the following:

- Names of the complainant(s) and respondent(s);
- Basis for the complaint;
- Issues, events or circumstances that caused the person to believe that s/he has been discriminated against;
- Information needed to address the issue;
- Criteria, sources necessary to obtain the information;
- Identification of key people;
- Estimated investigation time line;
- Remedy sought by the complainant(s).

The investigation will address only those issues relevant to the allegations in the complaint. Confidentiality will be maintained as much as possible. Interviews will be conducted to obtain facts and evidence regarding the allegations in the complaint. The investigator will ask questions to elicit information about aspects of the case. A chronological contact sheet will be maintained in the case file throughout the investigation.

Within 40 days of receiving the complaint, the investigator will prepare an investigative report and submit the report and supporting documentation to the City Manager or her/his designee, for review. The City Manager or designee will review the file and investigative report and make a final determination of “probable cause” or “no probable cause” and prepare the final decision letter. If the respondent is found to be in noncompliance with Title VI, remedial actions will be determined.

A copy of the complaint, together with a copy of the investigation report and the City Manager's final decision letter is forwarded to the appropriate agency within 60 days of the date the complaint was received. All records and investigative working files will be maintained in a confidential area. Records will be kept for three years.

If the complainant is dissatisfied with the determination and/or resolution set forth by the City, the same complaint may be submitted to VTrans for investigation. The complainant may seek further recourse from the Federal Transit Administration, if necessary.

City of Montpelier, Vermont
COMPLAINT FORM
Title VI/Environmental Justice and Related Statutes

1. Name: _____

2. Address: _____

3. Telephone Number: _____

4. Name of person charged with discrimination: _____

5. Date of alleged discriminatory act: _____

6. Type of discrimination: _____

7. Please write a summary of the facts supporting your complaint (use additional pages as necessary): _____

8. Names of witnesses to the alleged discriminatory act: _____

9. What do you want as a remedy for the alleged discrimination? _____

Signed: _____

Date: _____

Please return to: City of Montpelier
39 Main Street, City Hall
Montpelier, VT 05602-2950

III. Record of Title VI Investigations, Complaints, or Lawsuits

The City of Montpelier has no active lawsuits at this time, and has received no Title VI complaints or lawsuits in the past three years.

IV. Inclusive Public Participation

Public participation is an essential component of the planning process. From short-term service changes to long-range vision documents and investment strategies, input from the public about policies and services that affect them is critical to their successful implementation. The City of Montpelier conducts public outreach efforts and public hearings on planning efforts, service changes, and policy issues through its City Council or Council appointed committees.

Prior to discussing the means of engaging minority and low income communities in these activities, a brief demographic profile of Montpelier is presented in order to identify the number and concentration of minority and low-income residents. US Census data is the primary source of information for establishing minority and low-income populations in Montpelier. These statistics are from the 2016 American Community Survey, representing an average of data collected between 2012 and 2016.

Race/Ethnicity	Montpelier	Washington County
White	94.2%	96.0%
Hispanic/Latino	2.2%	1.8%
Asian	1.1%	0.8%
Black/African American	1.9%	0.8%
American Indian/Alaskan Native	0.0%	0.2%
Native Hawaiian/Pacific Islander	0.0%	0.0%
Other Race	0.0%	0.1%
Multi-Racial	2.8%	2.0%

Poverty Status	Montpelier	Washington County
Poverty Rate (Individuals)	11.4%	11.4%
Poverty Rate (Families)	8.7%	8.4%
Child Poverty Rate (< 18 years)	16.2%	17.3%
Elderly Poverty Rate (> 65 years)	3.3%	5.5%

It can be seen in the statistics that Montpelier and the rest of Washington County have very low concentrations of non-white residents, with African-Americans representing the largest minority group in the City, though still less than 2% of the population in both the city and the county.

Poverty is significantly more widespread with over 11% of individuals living below the federal poverty line. Child poverty is even more prevalent, though poverty among the elderly is less prevalent, especially in the city.

As public transportation is perhaps disproportionately relevant to the daily lives of Title VI protected groups and low-income Vermonters, the City of Montpelier will ensure that groups that represent these populations are included in these outreach efforts and that representatives of these organizations are invited to participate in project steering committees. All public meetings held as part of this public involvement process will be properly noticed in accordance with the requirements of Title VI of the civil rights act of 1964 and the Vermont public meeting law (Vermont Title 1, section 310 et seq., as amended), including public announcement of all meetings at least 24 hours before the meeting. Notes are taken at all meetings so that members of the public are not required to submit written comments in order to have their opinions recorded.

The City of Montpelier maintains contact with organizations that represent the interests of low-income, immigrant, and minority groups and notify them of upcoming public outreach activities. Meeting times and locations are designed to maximize accessibility for low-income and minority groups. A mix of daytime and early evening meetings will be scheduled and access to the meeting is guaranteed.

In terms of meeting locations, the City of Montpelier, as the focus of Title VI-protected groups, will always host public meetings/hearings in compliance with Title VI regulations and the Americans with Disabilities Act. In 2018 and beyond, the City of Montpelier will take additional steps to increase the participation of Title VI protected groups in public outreach activities such as adjusting meeting times when appropriate to allow for greater participation.

Notices for public meetings will include a statement in Spanish and French noting that those translation services languages are available upon request and a telephone number for more information about the meeting. The City of Montpelier will contact these organizations that represent Title VI-protected groups in their service area in advance of any public meetings or hearings being held regarding service changes, or other planning efforts.

The City of Montpelier will discuss with these groups means of encouraging participation in these meetings and will offer accommodations when appropriate to facilitate participation.

Below is a list of all meetings held to date on the Taylor Street Intermodal Center project. All of these were warned and open to the public.

Taylor Street Meetings

City Council:

Date	Item	Agenda
5/1/13	Set time/ date for a hearing to determine necessity and damages for the purposes of property acquisition by eminent domain...Property is located on Taylor Street.	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=849
6/5/13	Conduct a Public Hearing to hear testimony and consider the necessity, and possible compensation to be paid, for acquiring lands and rights in land for public purposes, namely a Multi-modal Transportation Center	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=904

9/11/13	Reconvening of the Public Hearing that City Council held on June 5, 2013, "to hear testimony and consider the necessity, and possible compensation to be paid, for acquiring lands and rights in land for public purposes, namely a Multi-modal Transportation Center.	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=979
3/26/14	Presentation by the Carr Lot Design Review Committee on the recommendation of Redstone as the development partner for the redevelopment of 1 Taylor Street.	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1108
4/16/14	Carr Lot Public Process	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1120
6/11/14	Authorize the City Manager to sign a Memorandum of Understanding with Redstone Development for the One Taylor Redevelopment Project.	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1157
6/25/14	One Taylor Street Redevelopment Public Hearing Regarding Use	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1163
7/9/14	One Taylor Street Redevelopment - Discussion of Use	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1168
9/10/14	Decision on Use of Upper Floor Development at 1 Taylor Street	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1215
2/11/15	Consideration of the 1 Taylor Street Construction Manager At-Risk	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1312
2/18/15	Discussion of the Downtown Transportation Fund Grant a) The Planning Department is considering an application to the Downtown Transportation Fund grant to fund infrastructure improvement on Taylor Street in conjunction with the development at 1 Taylor Street b) Recommendation: Receive an update from the Planning Director and consider the approval of the attached resolution required for this application.	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1314
7/8/15	City Council will conduct a Special Meeting in conjunction with the One Taylor Street Design Review Committee Meeting.	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1379
7/22/15	Authorize the City Manager to sign the Development Agreement with Redstone outlining the partnership between the two entities for the development of 1 Taylor Street	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1386

10/28/15	Mowatt Necessity Hearing	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1437
11/11/15	Continuation of Mowatt Necessity Hearing	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1443
12/9/15	Consideration of approving a Resolution to apply for a Disaster Recovery Grant, pursuant to the Council's Goal to "Maintain the Current Timeline and Budget for the 1 Taylor Street Redevelopment Project".	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1455
1/13/16	Bond Public Hearing	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1468
2/10/16	Approve and sign resolution authorizing Department of Planning and Community Development to submit grant application to Downtown Transportation Fund, administered by the Agency of Commerce and Community Development. This grant, will provide \$100,000 in funding for the Taylor Street Reconstruction Project.	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1483
2/24/16	Possible Discussion of Real Estate acquisitions related to the 1 Taylor Street Redevelopment Project.	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1488
3/23/16	Discussion of Real Estate (leases and easements) related to the 1 Taylor Street Redevelopment Project	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1499
7/13/16	Taylor Street Update	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1557
7/27/16	Authorize the City Manager to finalize and sign all easements and related documents for the purpose of constructing a bike path as part of the One Taylor Street project and approve expense of \$126,750 for this purpose.	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1573
8/10/16	Discussion of Real Estate Related to the 1 Taylor Redevelopment Project	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1581
9/21/16	Update on 1 Taylor Redevelopment Easements	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1599
10/26/16	Authorize City Manager to sign a Grant Agreement Resolution to accept \$850,000 in CDBG-Disaster Recovery Funds for the	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1609

	Reconstruction of the One Taylor Street River Wall	
1/18/17	One Taylor Street Review/Update	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1662
2/22/17	Accept Bond Resolution and Certificate for \$710,000 Bond Issue Closing in March, 2017 (Taylor Street, Shared Use Path and Retaining Walls)	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1678
3/22/17	One Taylor Update	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1693
4/26/17	Update on One Taylor Street and Bike Path Projects	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1700
5/10/17	Executive Session: Discussion with DEW/One Taylor Update	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1706
6/28/17	Public Hearing - Close out Community Development Block Grant Disaster Recovery for the One Taylor St. River Wall Reconstruction Project	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1734
7/26/17	One Taylor Street Real Estate Option Agreement With Downstreet Housing & Community Development	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1747
12/13/17	Taylor Street Project update	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1799
6/25/18	Resolution to allow City Manager to continue to negotiate agreements on 1 Taylor Street Project.	http://montpelier-vt.granicus.com/MetaViewer.php?meta_id=75065

Public Works:

12/6/16	Reconstructing Taylor Street	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1640
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Design Review Committee:

4/17/17	1 Taylor St (CB-I/DCD/FP) Owner: City of Montpelier Applicant: gbA Architecture & Planning – Gregg Gossens Approval to construct a multi-modal transit center, 45 residential dwelling units and associated parking, and recreation path/public spaces.	http://montpelier-vt.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=1697
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5/1/17	1 Taylor St (CB-I/DCD/FP)- continued Owner: City of Montpelier Applicant: gbA Architecture & Planning – Gregg Gossens Approval to construct a multi-modal transit center, 45 residential dwelling units and associated parking.	http://montpelier-vt.granicus.com/GeneratedAgendaView er.php?view_id=2&clip_id=1702
8/21/17	1 Taylor St (CB-I/DCD/FP) Owner: City of Montpelier Applicant: gbA Architecture & Planning – Gregg Gossens, representing Downstreet Design Review to reduce the scale of previously approved building. Number of dwelling units reduced from 45 to 30.	http://montpelier-vt.granicus.com/GeneratedAgendaView er.php?view_id=2&clip_id=1753

Development Review Board:

5/1/17	1 Taylor Street (CB-I/DCD/FP) Owner: City of Montpelier Applicant: gbA Architecture & Planning – Gregg Gossens Sketch Plan Review approval to construct a multi-modal transit center, associated parking, and a private multi-family dwelling consisting of 45 units.	http://montpelier-vt.granicus.com/GeneratedAgendaView er.php?view_id=2&clip_id=1703
6/5/17	1 Taylor St (CB-I/DCD/FP) Owner: City of Montpelier Applicant: gbA Architecture & Planning – Gregg Gossens Site Plan, Conditional Use, Design, and Preliminary and Final Review to construct a multi-modal transit center, associated parking, and privately owned multi-family dwelling consisting of 45 units of housing.	http://montpelier-vt.granicus.com/GeneratedAgendaView er.php?view_id=2&clip_id=1724
9/5/17	1 Taylor St. (CB-I/DCD/FP) Owner: City of Montpelier Applicant: gbA Architecture & Planning – Gregg Gossens, representing Downstreet. Amend previously approved project to reduce the number of dwelling units from 45 to 30 and modifications to the building.	http://montpelier-vt.granicus.com/GeneratedAgendaView er.php?view_id=2&clip_id=1765

V. Access to Services by Persons with Limited English Proficiency (LEP Plan)

A. Introduction

On Aug. 11, 2000, President Clinton signed Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency, to clarify Title VI of the Civil Rights Act of 1964. The executive order was issued to ensure accessibility to programs and services to otherwise eligible individuals not proficient in the English language. The executive order stated that individuals with a limited ability to read, write, speak and understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service,

benefit, or encounter. These individuals are referred to as being limited in their ability to speak, read, write, or understand English, hence the designation, "LEP," or Limited English Proficient.

B. Elements of an Effective LEP Policy

This LEP program has four main components to aid in identifying LEP persons so that they are provided meaningful access to Montpelier's services and activities that may affect their quality of life.

For the purposes of this plan, only those individuals who were identified in the 2010-2014 American Community Survey (ACS) 5-year data as having their ability to speak English as "less than very well" are being considered as LEP. The four components are as follows:

1. Identifying LEP persons who need language assistance. According to the 2014 ACS, 119 residents of the City of Montpelier and 395 residents of Washington County overall ages 5 or older spoke English less than "very well." The two languages spoken most frequently among these LEP persons were French and Serbo-Croatian. Considering these populations as a whole, this total number represents just 1.6% of the population ages 5 or older in Montpelier and 0.7% of the population of Washington County. Efforts to identify LEP persons besides the use of Census data are described below.

2. Identifying ways in which language assistance will be provided. The City of Montpelier provides oral and written translation; written interpretation and translation; and sign language, as requested, or as a result of an LEP analysis on any given project or projected program. The City of Montpelier monitors its contact or the possibility of contact with LEP individuals on an ongoing basis; and the frequency of contact and the services where LEP individuals are likely to access a program, service, or activity, on an annual basis, or as needed.

3. Training staff and others. All City of Montpelier staff involved in public outreach and public involvement receive training on identifying LEP populations and providing LEP translation and interpretation.

4. Providing notice to LEP persons. After LEP populations have been identified, strategies are developed to provide notice of a program, service, or activity, using appropriate media, including brochures (also in languages other than English). Community groups serving LEP populations are contacted, as well as schools, church groups, chambers of commerce, and other relevant entities.

C. Four Factor Analysis

The DOT guidance outlines four factors recipients should apply to the various kinds of contacts they have with the public to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons:

1. The number and proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.

3. The nature and importance of the program, activity, or service provided by the recipient to the LEP community.
4. The resources available to Montpelier and overall cost.

Factor 1 - Prevalence of LEP Persons

The City of Montpelier has a very low percentage of people who speak English less than “very well.” In the 2010-2014 American Community Survey, for the city as a whole the figure was 1.6%. For Washington County as a whole, that figure is 0.7%. The table below breaks down these figures by the language spoken by the LEP persons.

	Montpelier		Washington County	
Speak only English	6,867	94.3%	54,228	96.7%
Spanish or Spanish Creole:	52	0.7%	306	0.5%
Spanish or Spanish Creole: - Speak English less than "very well"	5	0.1%	30	0.1%
French (incl. Patois, Cajun):	104	1.4%	844	1.5%
French (incl. Patois, Cajun): - Speak English less than "very well"	14	0.2%	138	0.2%
German:	23	0.3%	156	0.3%
German: - Speak English less than "very well"	5	0.1%	52	0.1%
Serbo-Croatian:	117	1.6%	151	0.3%
Serbo-Croatian: - Speak English less than "very well"	63	0.9%	83	0.1%
Other Indic languages:	26	0.4%	30	0.1%
Other Indic languages: - Speak English less than "very well"	10	0.1%	10	0.0%
Vietnamese:	24	0.3%	62	0.1%
Vietnamese: - Speak English less than "very well"	7	0.1%	24	0.0%
Other Asian languages:	19	0.3%	211	0.4%
Other Asian languages: - Speak English less than "very well"	-	0.0%	33	0.1%
Other	50	0.7%	103	0.2%
Other - Speak English less than "very well"	15	0.2%	25	0.0%
Total	7,282	100.0%	56,091	100.0%
Total - Speak English less than "very well"	119	1.6%	395	0.7%

Both the city and county figures, taking all languages together as a whole, do not exceed the safe harbor thresholds of 1,000 individuals or 5% of the population that would trigger the requirement for written translations of vital documents.

Factor 2 - Frequency with which LEP individuals come in contact with the program

LEP individuals, in general, will depend more on public transportation than those who are English proficient. Many of the social service agencies that serve immigrants and refugees will help LEP individuals in their navigation of transit center when built. The City of Montpelier will coordinate with those agencies that are in contact with LEP individuals as well transportation providers, The State of Vermont, and social service agencies prior to, during, and after construction to ensure appropriate access to services. Signage at the intermodal station will be a joint responsibility of the City and the transportation providers there (including Green Mountain Transit and Greyhound).

Factor 3 - Importance to LEP Persons of Program, Activities and Services

The importance of providing transportation services to the LEP population is lower than providing some other services to this population, such as emergency medical services or legal services to a person who has been arrested. Nevertheless, providing public transportation access to LEP persons is critical. An LEP person’s inability to effectively utilize public transportation may adversely affect his or her ability to obtain health care, education, or access to employment.

Factor 4 - Resources Available and Cost

Due to the very low incidence of LEP persons in Central Vermont, the cost to accommodate such individuals is not anticipated to be burdensome. The City of Montpelier will evaluate the need to provide additional resources after construction of the Transit and Welcome Center is complete and operational.

VI. Non-elected Planning Boards

The City of Montpelier does not have any transit-related, non-elected planning boards, advisory councils or committees. The City’s Planning Commission has seven members appointed by the City Council for overlapping two-year terms. The Planning Commission on occasion considers transit-related issues. All seven members of the Planning Commission are Caucasian. There are currently four women and three men on the commission.

Board	Racial Composition
Planning Commission	All seven members are Caucasian

When new members are needed for the commission, the City Council will actively seek members who represent the minority community in Montpelier. Given that minorities represent less than 5% of the population, the current composition of the commission is not unrepresentative.

VII. Oversight of Subrecipients

The City of Montpelier has no subrecipients of FTA funds.

VIII. Transit Facility

For over 20 years, the City of Montpelier has been pursuing the construction of an intermodal passenger facility in the downtown area. Passenger facilities are not subject to Title VI equity analysis in the same way as vehicle storage, maintenance, or operations facilities. The intermodal transit station has undergone extensive environmental analysis. Some excerpts from the analysis are included below for reference.

The proposed project is consistent with the varied planning documents that outline the goals for future development of the region. These documents include the *Central Vermont Regional Plan*, the *City of Montpelier Master Plan* (2010), and the *Capital District Master Plan* (2000).

Montpelier, as the capital city, has a large elderly, disabled, and low-income population. The transit facility will facilitate access to and between different modes of public transportation and assist area

elderly and low-income population segments to better access area services and activities. It will provide much needed amenities for transit patrons.

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations, provides that no federally funded project should be implemented in such a way as to result in disproportionately high and adverse effects on minority and low-income populations.

The primary purpose of the project is to connect pedestrian, rail, and bus transportation for commuters as well as comfort facilities and information for visitors and other travelers. The facility will be built on a site that is currently used as a gravel surface parking lot. Uses in the immediate vicinity of the site are parking lots, a rail line, and the Winooski River and the North Branch River. With Green Mountain Transit operating from the Transit Center, it will be a coordinated hub for inter- and intra-city transit, pedestrian facilities, and the potential for future rail.

While some ambient increases in noise, air emissions, and traffic may be noticeable to residents and commercial uses in the downtown, these effects are anticipated to dissipate rapidly beyond the immediate facility. Noise during and after construction will be expected to comply with Montpelier's noise ordinance.

The project is expected to have a predominantly positive impact on area residents by offering increased transportation access and choices to services, recreation, and employment. There are no known existing minority-owned businesses or residences that will be impacted by this project. Because a high proportion of low-income, minority and mobility-limited or self-care-limited persons reside in the area, the project may be particularly beneficial offering new ADA-compliant transportation facilities and greater access to jobs.