



# ***Title VI and Environmental Justice Program*** *(Non-Discrimination in Federally Assisted Programs)*

***ADOPTED***  
***September 22, 2020***

Southern New Hampshire Planning Commission  
438 Dubuque St.  
Manchester, NH 03102

# **TABLE OF CONTENTS**

|  |   |           |
|--|---|-----------|
| <b>1.0</b>   | <b>TITLE VI POLICY STATEMENT .....</b>  | <b>3</b>  |
| <b>2.0</b>   | <b>TITLE VI POLICY OBJECTIVES .....</b>   | <b>4</b>  |
| <b>3.0</b>   | <b>GENERAL REQUIREMENTS.....</b>  | <b>4</b>  |
| 3.1  | Requirement to Provide Title VI Assurances .....                                      | 4         |
| 3.2  | Requirement to Prepare and Submit a Title VI Program .....                            | 5         |
| 3.3  | Requirement to Notify Beneficiaries of Protection Under Title VI.....                 | 5         |
| 3.4  | Requirement to Develop Title VI Complaint Procedures and Complaint Form.....          | 6         |
| 3.5  | Requirement to Record and Report Title VI Investigations, Complaints, and Lawsuits... | 6         |
| 3.6  | Requirement to Promote Inclusive Public Participation.....                            | 7         |
| 3.7  | Requirement to Develop a Demographic Profile of the Metropolitan Area .....           | 8         |
| 3.8  | Requirement to Provide Meaningful Access to LEP Persons .....                         | 17        |
| 3.9  | Minority Representation on Planning and Advisory Bodies .....                         | 20        |
| 3.10   | Providing Assistance to Sub-recipients .....  | 21        |
| 3.11   | Monitoring Sub-recipients.....  | 21        |
| 3.12   | Determination of Site or Location of Facilities .....                                 | 22        |
| 3.13   | Requirement to Provide Additional Information Upon Request.....                       | 22        |
| 3.14   | Annual Reporting of Accomplishments .....   | 22        |
| <b>4.0</b>   | <b>REQUIREMENTS FOR METROPOLITAN PLANNING ORGANIZATIONS.....</b>                      | <b>23</b> |
| 4.1  | Requirement that Metropolitan Planning Activities Comply With Title VI .....          | 23        |
| 4.2  | Requirements for Program Administration .....   | 23        |
| <b>APPENDIX A – TITLE VI NOTICE TO THE PUBLIC .....</b>                        |   | <b>25</b> |
| <b>APPENDIX B – TITLE VI CERTIFICATIONS AND ASSURANCES .....</b>               |   | <b>27</b> |
| <b>APPENDIX C – TITLE VI COMPLAINT FORM AND INVESTIGATIVE PROCEDURES .....</b> |   | <b>31</b> |
|  | Report of Title VI Investigations, Complaints, and Lawsuits .....                     | 33        |
|  | SNHPC MPO Title VI Complaint Form.....  | 34        |
| <b>APPENDIX D - SNHPC MPO &amp; TAC MEMBERSHIP.....</b>                        |   | <b>36</b> |

## 1.0 TITLE VI POLICY STATEMENT

It is the policy of the Southern New Hampshire Planning Commission (SNHPC) Metropolitan Planning Organization (MPO) to effectuate Title VI of the Civil Rights Act of 1964, as amended, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all Federal programs and activities. Pursuant to this obligation, no person shall, on the grounds of race, color, national origin, sex, or income status be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination in any program or activity carried out by the SNHPC. The SNHPC will also monitor and enforce statutory requirements imposed on its sub-recipients and participants of Federally-assisted programs and projects. The SNHPC further assures that every effort will be made to ensure nondiscrimination in all of its programs and operations, regardless of funding source.

The SNHPC MPO operates without regard to race, color, national origin, sex, or income status. SNHPC MPO meetings are held in accessible locations, and reasonable accommodations are made for individuals with disabilities upon request within a reasonable advance notice period (usually two weeks or 10 business days). If you would like accessibility or language accommodation for any SNHPC MPO meeting, please contact the SNHPC Office Administrator at 603-669-4664, or by email: [lmooresobrien@snhpc.org](mailto:lmooresobrien@snhpc.org).

If you feel you have been discriminated against based on your race, color, national origin, sex, or income status, you may file a complaint following the SNHPC MPO Title VI Complaint Form (included as Appendix C of this document). If you cannot download the document, or need additional information, please feel free to contact the Southern New Hampshire Planning Commission at 603-669-4664.

Alternatively, you may file a complaint by contacting the FTA Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.



Sylvia von Aulock  
Executive Director & CEO

9/22/20

Date

## **2.0 TITLE VI POLICY OBJECTIVES**

The Southern New Hampshire Planning Commission (SNHPC) Metropolitan Planning Organization (MPO) has in place a Program based on Title VI of the Civil Rights Act of 1964 (42 U.S.C Section 2000d) and U.S. Department of Transportation Regulation 49 CFR Part 21 “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation”. The Program is based on Federal Transit Administration Circular FTA C 4702.1B, “Title VI Requirements and Guidelines for Federal Transit Administration Recipients”, October 1, 2012.

The objectives of the program are as follows:

- A. To ensure the level and quality of transportation service is provided without regard to race, color, or national origin;
- B. To identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;
- C. To promote the full and fair participation of all affected populations in transportation decision-making;
- D. To prevent the denial, reduction or delay in benefits related to programs and activities that benefit minority populations or low-income populations; and
- E. To ensure meaningful access to programs and activities by persons with limited English proficiency.

## **3.0 GENERAL REQUIREMENTS**

As part of the Southern New Hampshire Planning Commission (SNHPC) Metropolitan Planning Organization (MPO) Title VI Program, the MPO maintains certain reporting requirements and provides the New Hampshire Department of Transportation (NHDOT) and Federal Transit Administration (FTA) the following information regarding these reporting requirements. In addition to the first 12 General Requirements below, which are required of all recipients of Federal aid, Metropolitan Planning Organizations must respond to additional requirements related to planning of federally-funded transportation projects, and program administration, which are addressed at the end of this section.

### **3.1 Requirement to Provide Title VI Assurances**

The SNHPC MPO will submit its Title VI Assurances as part of its annual *Certifications and Assurances* submission to NHDOT, FHWA, and FTA. The SNHPC MPO acts as the Lead Agency for the administration of FTA Section 5310 Purchase of Service and Formula Funds on behalf of the Region 8/9 Coordinating Council for Community Transportation. The current sub-recipients of this funding are the Manchester Transit Authority, Easter Seals of New Hampshire, Rockingham Nutrition Meals on Wheels, and Catholic Charities. The SNHPC MPO will collect Title VI Assurances from sub-recipients prior to passing through FTA funds.

A copy of the Title VI Assurances included in the SNHPC's annual *Certifications and Assurances* submission to NHDOT, FHWA and FTA is included in Appendix B of this document.

### **3.2 Requirement to Prepare and Submit a Title VI Program**

This document constitutes the Title VI Program for the Southern New Hampshire Planning Commission (SNHPC) Metropolitan Planning Organization (MPO).

### **3.3 Requirement to Notify Beneficiaries of Protection Under Title VI**

The SNHPC MPO has established methods for notification to the public regarding its Title VI obligations, how to get more information regarding the MPO's non-discrimination obligations, and procedures for filing a discrimination complaint against the MPO. The public notice is included in Appendix A of this document.

The public notice is posted at the MPO offices, and is accessible on the MPO website at [www.snhpc.org](http://www.snhpc.org). Below are English and Spanish versions of the SNHPC MPO's Notification of Protection:

#### English

*The SNHPC MPO operates without regard to race, color, national origin, sex, creed, or income status. MPO meetings are held in accessible locations, and reasonable accommodations are made for individuals with disabilities upon request within a reasonable advance notice period (usually two weeks or 10 business days). If you would like accessibility or language accommodation for any SNHPC MPO meeting, please contact the SNHPC Office Administrator at 603-669-4664 or by email: [lmoores@snhpc.org](mailto:lmoores@snhpc.org).*

*If you feel you have been discriminated against based on your race, color, national origin, sex, creed, or income status, you may file a complaint using the SNHPC MPO Title VI Complaint Form. If you cannot download the document or need additional information, please feel free to contact the Southern New Hampshire Planning Commission at 603-669-4664.*

*Alternatively, you may file a complaint by contacting the FTA Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.*

#### Spanish

*La Comisión de Planificación Southern New Hampshire Organización de Planificación Metropolitana opera sin distinción de raza, color, origen nacional, sexo, credo, o estado de ingresos. MPO reuniones se llevan a cabo en lugares accesibles y razonables se hacen para las personas con discapacidad que lo soliciten dentro de un plazo de preaviso razonable (generalmente dos semanas o 10 días hábiles). Si desea alojamiento accesibilidad o el idioma para las reuniones MPO SNHPC, por favor póngase en*

*contacto con el administrador de la oficina de SNHPC en 603-669-4664 o por correo electrónico: [lmoore-o'brien@snhpc.org](mailto:lmoore-o'brien@snhpc.org).*

*Si usted siente que ha sido discriminado por su raza, color, origen nacional, sexo, credo, o estado de ingresos, usted puede presentar una queja siguiendo la forma MPO SNHPC queja del Título VI. Si usted no puede descargar el documento o necesita información adicional, por favor no dude en ponerse en contacto con la Comisión de Planificación en Southern New Hampshire 603-669-4664.*

*Alternativamente, usted puede presentar una queja contactando FTA Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.*

### **3.4 Requirement to Develop Title VI Complaint Procedures and Complaint Form**

The SNHPC MPO has developed procedures for investigating and tracking Title VI complaints that may be filed against the MPO and for making these procedures available to members of the public upon request. SNHPC MPO sub-recipients shall be required to have such procedures and shall be encouraged to adopt the MPO's complaint investigation and tracking procedures.

A copy of the SNHPC MPO's Title VI Complaint and Investigation Procedures and Title VI Complaint Form is included in Appendix C of this document. The SNHPC MPO Title VI Coordinator is Linda Moore-O'Brien, Office Administrator, Southern New Hampshire Planning Commission, 438 Dubuque Street, Manchester, NH 03102.

Additionally, anyone wishing to file a Title VI complaint against the SNHPC MPO may do so directly with the Federal Transit Administration (FTA) by contacting the FTA Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

### **3.5 Requirement to Record and Report Title VI Investigations, Complaints, and Lawsuits**

In compliance with 49 CFR Section 21.9(b), the SNHPC MPO and all sub-recipients shall prepare and maintain a list of any active investigations conducted by entities other than the FTA or FHWA, lawsuits, or complaints naming the SNHPC MPO or sub-recipient alleging discrimination on the basis of race, color, national origin, sex, creed, or income status. This list shall include the date the investigation, lawsuit, or complaint was filed and received by the MPO, a summary of the allegation(s), the status of the investigation, lawsuit or complaint, and actions taken by the MPO or sub-recipient in response to the investigation, lawsuit, or complaint.

The SNHPC MPO's form for recording this information is included in Appendix C of this document. The list shall comprise all of the records of active investigations, lawsuits, and complaints recorded on these forms. During the processing of active investigations, lawsuits, or complaints, the Title VI Coordinator shall update the record form as necessary. Upon resolution and closure of an investigation, lawsuit or complaint, the Title VI Coordinator shall record such closure on this form.

The Southern New Hampshire Planning Commission (SNHPC) Metropolitan Planning Organization (MPO) was designated by Governor Meldrim Thomson on December 31, 1973. Since the designation of the MPO, there have been no Title VI complaints, investigations, or lawsuits filed against the MPO.

### **3.6 Requirement to Promote Inclusive Public Participation**

The content and considerations of Title VI, the Executive Order on Limited English Proficiency (LEP), and the DOT LEP Guidance are integrated into the Public Involvement Process for the SNHPC Region and the SNHPC MPO Prospectus.

Public participation is vital to the SNHPC MPO. It helps provide the MPO the broadest spectrum of relevant information available prior to its decision-making and offers the public an opportunity to raise concerns that can be considered along with discussion of technical, political and economic merit.

Of particular importance in the pursuit of public participation is the identification of audiences which would be affected by or have a business or other affinity with the issues under consideration. All views should be heard and their participation likewise encouraged. In this context, minority views include not only ethnic groups but also others whose perspectives may not be fully reflected by larger segments of the public.

Through the regional planning process, the MPO and partner agencies will thoroughly analyze the three federally-established fundamental environmental justice principles:

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

The MPO actively seeks to solicit the comments and engage the interests of the public through the participation process. It then is the responsibility of the MPO and the NH Department of Transportation to balance the public's needs and desires with resources available to address those needs and desires.

MPO staff are directed to incorporate appropriate activities to make public communications and outreach a part of the agency's overall planning process. In addition to required public hearings, such activities may include: representative task forces or advisory committees; public meetings and workshops, presentations and discussions with special interest organizations, forums or conferences that provide information about issues and processes and the opportunity for input from the public; opinion polls, surveys, focus groups and interviews to acquire information; and use of the media and reports to disseminate information.

Specific outreach efforts designed to gather input on the needs of underrepresented populations in the SNHPC MPO region in recent years include, though are not limited to, the following:

- Surveys of municipal officials regarding the transportation needs of residents in their communities who have sought assistance, or other community members who may not seek assistance but nonetheless have unmet transportation needs.
- Surveys of regional and statewide non-profit health and human service agencies regarding the transportation needs of the client populations with whom they work.
- Surveys of riders of Manchester Transit Authority (MTA), which recently merged with the Greater Derry-Salem Cooperative Alliance for Regional Transportation (CART) and serves as the primary public transportation provider in the SNHPC MPO region.
- Ongoing participation in and technical assistance to the Southern New Hampshire (Region 8/9) Regional Coordinating Council (RCC) for Community Transportation, which serves the SNHPC MPO planning region. The council is comprised of public and private organizations that provide transportation services for transit dependent populations, purchase these services, or otherwise work with populations likely to need these services. The RCC also engages citizen members, including individuals with disabilities who are regular users of public transit.
- Finally, as part a joint effort with the eight other RPCs around New Hampshire on the “Granite State Future” initiative, the SNHPC partnered with *New Hampshire Listens* on a series of focus group meetings targeting traditionally underserved populations. These included groups such as immigrant and refugee populations, low income residents, individuals with disabilities, senior citizens, and youth. The SNHPC has also consulted with NH Catholic Charities and Ascentria Care Network (formerly Lutheran Social Services), the two primary agencies that work with immigrant populations in the region, to enlist their assistance to engage members of these communities in the development of the SNHPC’s metropolitan transportation planning products.

The SNHPC MPO seeks to reduce or eliminate language, mobility, temporal, and other obstacles that may prevent minority, disability, low-income and other under-represented populations from fully participating in the metropolitan planning process. It is the policy of the MPO to locate all in-person public meetings in facilities that are structurally accessible. In-person meetings of the MPO Technical Advisory Committee and the MPO Policy Committee are held during the day at the Southern New Hampshire Planning Commission offices, which are ADA accessible as well as accessible by the Manchester Transit Authority’s public transit services.

### **3.7 Requirement to Develop a Demographic Profile of the Metropolitan Area**

The SNHPC MPO has prepared a demographic analysis of minority and low-income populations for the fourteen (14) communities that currently make up the MPO planning region. Data on the racial and ethnic makeup of the region, low-income population, and Limited English Proficiency (LEP) population were drawn from the American Community Survey (ACS) 2014-2018 five-year data compilation.

It is important to note that the ACS data represent a much smaller survey sample, even with a five-year compilation, than the former Census Long Form, from which information on income and poverty have previously been drawn. While the ACS data provide useful annual snapshots at the national, state and county levels, they contain high margins of error for smaller towns, and especially for small sub-populations within towns. However, the ACS data represents the best data available for regional demographic measures since the 2010 Census.



## Minority Population

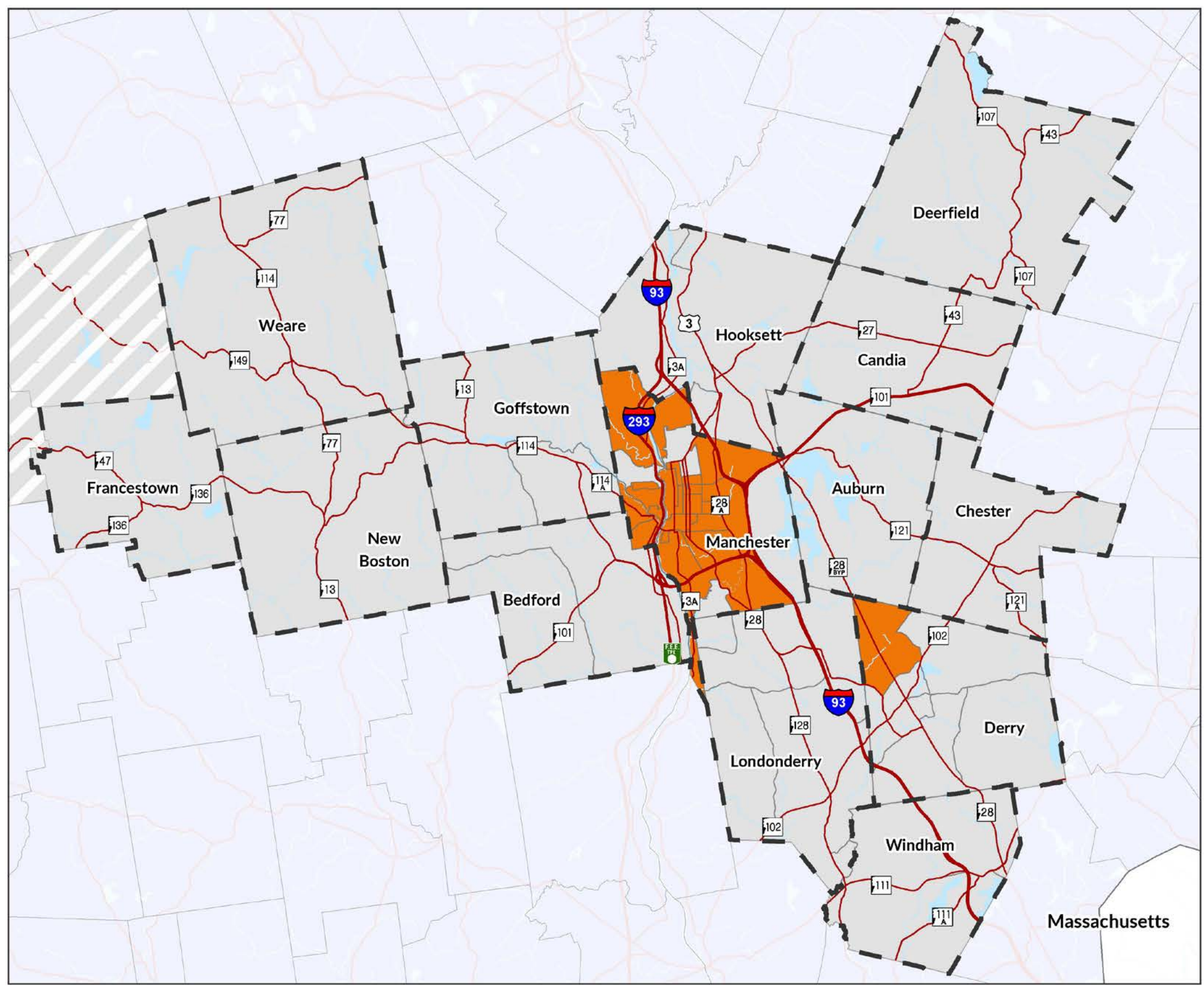
Table 1 identifies the number of racial and ethnic minority residents for each municipality in the MPO region, for every census tract in the MPO region, as well as minority residents as a percentage of overall population. In the SNHPC MPO region, minorities make up approximately 13.0% of the population. This average is exceeded in one (1) census tract in Derry, twenty-five (25) census tracts in the City of Manchester, and in the City of Manchester as a whole. Statewide, members of racial and ethnic minority groups make up 10.0% of the population. This is a significant increase since the 2010 census, when racial and ethnic minorities made up only 7.5% of the population statewide.

Map 1 shows where there is a concentration of minority populations at the census tract level, defined as those census tracts where the minority population exceeds the regional average of 13.0% of the population.

Map 2 shows minority population as a percentage of total population, together with projects identified in the current SNHPC Long-Range Transportation Plan. The highest concentrations of minority populations in the region are in Manchester, southeast of Queen City Bridge and FE Everett Turnpike (I-293). The regional distribution of approved Long-Range Transportation projects does not suggest that communities with larger minority populations are subject to a disproportionate share of either benefits or adverse impacts from transportation projects.

**Table 1 - Minority Populations in the SNHPC MPO Region**  
(Source: 2014-2018 American Community Survey 5-Year Estimates)

| Census Tract | Municipality                   | Total Population | Black | American Indian/ Alaskan | Asian | Hawaiian/ Pacific Islander | Other Race | 2+ Races | Hispanic/ Latino | Total Minority Population | Percentage Minority |
|--------------|--------------------------------|------------------|-------|--------------------------|-------|----------------------------|------------|----------|------------------|---------------------------|---------------------|
| 40           | Auburn                         | 5,385            | 0     | 0                        | 39    | 0                          | 0          | 30       | 100              | 153                       | 2.8%                |
| 29.01        | Bedford                        | 7,725            | 170   | 0                        | 189   | 0                          | 0          | 148      | 232              | 789                       | 10.2%               |
| 29.02        | Bedford                        | 6,309            | 42    | 0                        | 15    | 0                          | 0          | 165      | 175              | 431                       | 6.8%                |
| 29.03        | Bedford                        | 8,354            | 33    | 0                        | 93    | 0                          | 30         | 240      | 113              | 608                       | 7.3%                |
| 500          | Candia                         | 3,925            | 0     | 0                        | 11    | 0                          | 27         | 123      | 127              | 273                       | 7.0%                |
| 510          | Chester                        | 5,039            | 20    | 0                        | 125   | 0                          | 0          | 20       | 140              | 322                       | 6.4%                |
| 560          | Deerfield                      | 4,463            | 58    | 0                        | 0     | 0                          | 0          | 36       | 9                | 152                       | 3.4%                |
| 33.01        | Derry                          | 4,495            | 0     | 9                        | 13    | 0                          | 0          | 57       | 75               | 161                       | 3.6%                |
| 33.02        | Derry                          | 5,110            | 72    | 0                        | 71    | 0                          | 0          | 61       | 417              | 819                       | 16.0%               |
| 34           | Derry                          | 5,511            | 62    | 0                        | 39    | 0                          | 12         | 34       | 77               | 212                       | 3.8%                |
| 35           | Derry                          | 5,437            | 37    | 0                        | 0     | 0                          | 0          | 160      | 113              | 276                       | 5.1%                |
| 36.01        | Derry                          | 6,643            | 0     | 0                        | 0     | 0                          | 0          | 41       | 139              | 180                       | 2.7%                |
| 36.02        | Derry                          | 6,319            | 46    | 0                        | 61    | 0                          | 27         | 150      | 354              | 569                       | 9.0%                |
| 215          | Francestown-Bennington-Deering | 5,010            | 37    | 19                       | 8     | 0                          | 3          | 121      | 60               | 251                       | 5.0%                |
| 27.01        | Goffstown                      | 3,743            | 0     | 0                        | 0     | 0                          | 0          | 0        | 45               | 45                        | 1.2%                |
| 27.02        | Goffstown                      | 5,996            | 31    | 7                        | 34    | 0                          | 18         | 98       | 64               | 253                       | 4.2%                |
| 28           | Goffstown                      | 8,323            | 89    | 74                       | 18    | 76                         | 22         | 211      | 350              | 684                       | 8.2%                |
| 30.01        | Hooksett                       | 4,294            | 81    | 0                        | 0     | 0                          | 16         | 86       | 45               | 241                       | 5.6%                |
| 30.06        | Hooksett                       | 3,782            | 16    | 0                        | 10    | 0                          | 19         | 21       | 245              | 304                       | 8.0%                |
| 442          | Hooksett                       | 6,145            | 88    | 0                        | 0     | 0                          | 38         | 147      | 136              | 393                       | 6.4%                |
| 37.01        | Londonderry                    | 3,786            | 65    | 0                        | 20    | 0                          | 6          | 36       | 122              | 261                       | 6.9%                |
| 37.03        | Londonderry                    | 5,708            | 191   | 12                       | 47    | 0                          | 0          | 62       | 28               | 413                       | 7.2%                |
| 38.01        | Londonderry                    | 4,149            | 9     | 0                        | 0     | 0                          | 0          | 71       | 128              | 311                       | 7.5%                |
| 38.02        | Londonderry                    | 4,207            | 2     | 0                        | 2     | 0                          | 0          | 75       | 214              | 362                       | 8.6%                |
| 39.01        | Londonderry                    | 4,368            | 68    | 0                        | 11    | 0                          | 0          | 28       | 101              | 208                       | 4.8%                |
| 39.02        | Londonderry                    | 3,311            | 19    | 0                        | 27    | 0                          | 11         | 62       | 165              | 243                       | 7.3%                |
| 9800.1       | Londonderry                    | 0                | 0     | 0                        | 0     | 0                          | 0          | 0        | 0                | 0                         | 0.0%                |
| 1.01         | Manchester                     | 2,942            | 81    | 0                        | 28    | 0                          | 3          | 48       | 142              | 305                       | 10.4%               |
| 1.02         | Manchester                     | 5,044            | 204   | 10                       | 263   | 0                          | 38         | 112      | 144              | 1,011                     | 20.0%               |
| 2.02         | Manchester                     | 2,433            | 60    | 7                        | 6     | 0                          | 40         | 31       | 101              | 209                       | 8.6%                |
| 2.03         | Manchester                     | 3,479            | 214   | 0                        | 57    | 0                          | 42         | 109      | 254              | 693                       | 19.9%               |
| 2.04         | Manchester                     | 5,114            | 237   | 0                        | 356   | 0                          | 290        | 65       | 233              | 1,164                     | 22.8%               |
| 3            | Manchester                     | 2,941            | 249   | 35                       | 0     | 0                          | 15         | 92       | 443              | 744                       | 25.3%               |
| 6            | Manchester                     | 2,206            | 175   | 0                        | 243   | 0                          | 0          | 21       | 126              | 328                       | 14.9%               |
| 7            | Manchester                     | 2,900            | 33    | 9                        | 6     | 0                          | 0          | 37       | 89               | 181                       | 6.2%                |
| 8            | Manchester                     | 2,368            | 106   | 15                       | 12    | 0                          | 0          | 114      | 315              | 492                       | 20.8%               |
| 9.01         | Manchester                     | 3,437            | 220   | 0                        | 59    | 0                          | 18         | 101      | 419              | 683                       | 19.9%               |
| 9.02         | Manchester                     | 5,735            | 580   | 0                        | 309   | 17                         | 230        | 128      | 332              | 1,482                     | 25.8%               |
| 10           | Manchester                     | 5,947            | 15    | 0                        | 109   | 0                          | 59         | 156      | 72               | 498                       | 8.4%                |
| 11           | Manchester                     | 5,361            | 401   | 0                        | 52    | 0                          | 284        | 56       | 131              | 1,039                     | 19.4%               |
| 12           | Manchester                     | 1,834            | 118   | 0                        | 16    | 0                          | 30         | 22       | 102              | 275                       | 15.0%               |
| 13           | Manchester                     | 2,979            | 163   | 0                        | 127   | 0                          | 29         | 40       | 434              | 833                       | 28.0%               |
| 14           | Manchester                     | 2,219            | 462   | 42                       | 35    | 0                          | 260        | 139      | 534              | 1,203                     | 54.2%               |
| 15           | Manchester                     | 2,905            | 341   | 0                        | 0     | 0                          | 152        | 131      | 767              | 1,423                     | 49.0%               |
| 16           | Manchester                     | 4,785            | 421   | 22                       | 232   | 13                         | 223        | 181      | 916              | 2,006                     | 41.9%               |
| 17           | Manchester                     | 2,208            | 25    | 0                        | 34    | 0                          | 0          | 241      | 629              | 945                       | 42.8%               |
| 18           | Manchester                     | 5,954            | 348   | 0                        | 117   | 0                          | 1          | 466      | 440              | 1,261                     | 21.2%               |
| 19           | Manchester                     | 3,415            | 278   | 0                        | 35    | 0                          | 94         | 35       | 712              | 1,125                     | 32.9%               |
| 20           | Manchester                     | 2,163            | 185   | 0                        | 13    | 0                          | 52         | 60       | 463              | 818                       | 37.8%               |
| 21           | Manchester                     | 5,000            | 429   | 12                       | 31    | 0                          | 49         | 130      | 646              | 1,493                     | 29.9%               |
| 22           | Manchester                     | 3,177            | 90    | 0                        | 36    | 0                          | 68         | 36       | 427              | 503                       | 15.8%               |
| 23           | Manchester                     | 3,873            | 330   | 0                        | 96    | 0                          | 91         | 37       | 169              | 640                       | 16.5%               |
| 24           | Manchester                     | 6,929            | 504   | 0                        | 13    | 0                          | 301        | 329      | 914              | 1,595                     | 23.0%               |
| 25           | Manchester                     | 5,373            | 66    | 0                        | 268   | 0                          | 15         | 243      | 134              | 731                       | 13.6%               |
| 26           | Manchester                     | 6,009            | 1     | 0                        | 315   | 0                          | 40         | 109      | 519              | 981                       | 16.3%               |
| 2004         | Manchester                     | 2,927            | 134   | 43                       | 134   | 0                          | 12         | 26       | 441              | 753                       | 25.7%               |
| 9801         | Manchester                     | 0                | 0     | 0                        | 0     | 0                          | 0          | 0        | 0                | 0                         | 0.0%                |
| 200          | New Boston                     | 5,616            | 0     | 0                        | 7     | 0                          | 0          | 55       | 111              | 175                       | 3.1%                |
| 210          | Weare                          | 9,011            | 16    | 0                        | 0     | 0                          | 0          | 154      | 162              | 387                       | 4.3%                |
| 1061         | Windham                        | 7,534            | 61    | 0                        | 49    | 0                          | 79         | 131      | 339              | 692                       | 9.2%                |
| 1061         | Windham                        | 6,974            | 54    | 0                        | 28    | 0                          | 41         | 170      | 168              | 533                       | 7.6%                |
|              | MPO Region                     | 278,329          | 7,837 | 316                      | 3,919 | 106                        | 2,785      | 6,088    | 15,602           | 36,115                    | 13.0%               |



Map # 1  
**TITLE VI**  
 SNHPC MPO Region  
 Areas of Minority  
 Concentration

- Areas of Minority Concentration\*
- Other Census Tracts

\*Greater than 13%, the overall regional rate.



Created by the Southern New Hampshire Planning Commission, 2020. Figures reflect 2018 5-Year American Community Survey data. Sources: NH Department of Transportation; University of Minnesota; US Census Bureau; US Geological Survey.



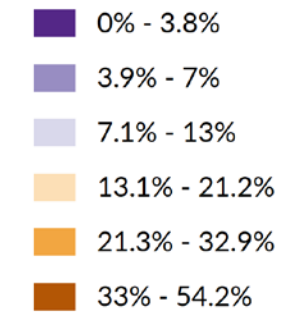


Map # 2

## TITLE VI

### Minority Population and FY 2017 - FY 2040 Regional Transportation Plan (RTP) Projects

#### Percentage of Population Minority by Census Tract



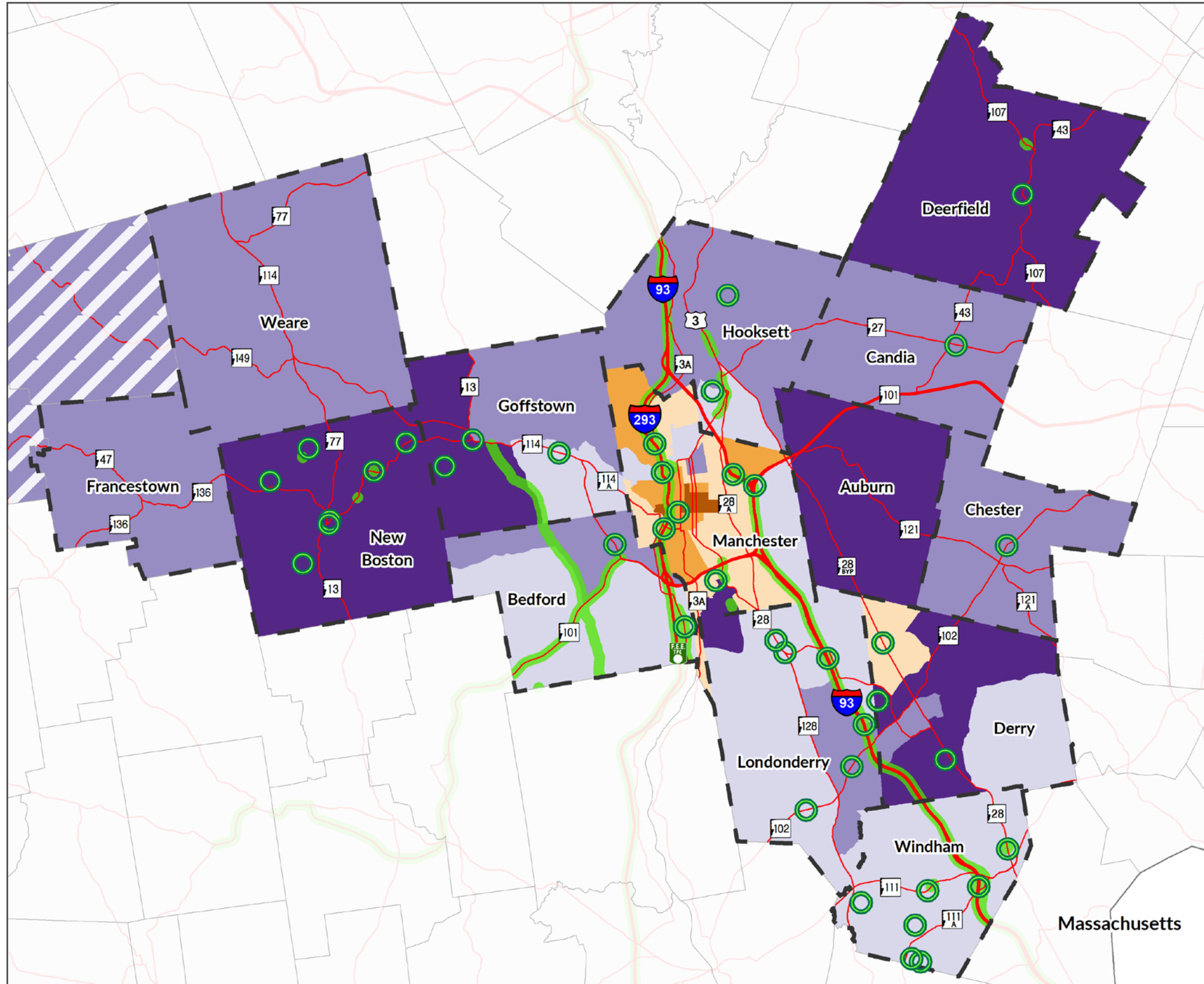
RTP Projects

SNHPC Municipalities



**SNHPC**

Created by the Southern New Hampshire Planning Commission, 2020. Figures reflect 2018 5-Year American Community Survey data. Sources: NH Department of Transportation; University of Minnesota; US Census Bureau; US Geological Survey.



### Low Income Populations

Table 2 on the following page utilizes 2014-2018 American Community Survey 5-Year Estimates to show the number and percentage of the population in poverty by both census tract and municipality in the SNHPC MPO Region. The mean percentage of persons in poverty in the SNHPC MPO Region is 8.5%. This average is exceeded in four (4) census tracts in the Town of Derry, one (1) census tract in the Town of Goffstown, twenty-one (21) census tracts in the City of Manchester, and in the City of Manchester as a whole.

Map 3 illustrates those census tracts within the SNHPC region with a concentration of low-income population, defined as those census tracts that exceed the MPO average of 8.5%.

Map 4 shows the low-income population as a percentage of total population, together with projects identified in the current SNHPC Long-Range Transportation Plan. The distribution of approved Long-Range Transportation projects does not suggest that areas with larger low-income populations are subject to a disproportionate share of either benefits or adverse impacts from transportation projects.

**Table 2 – Low Income Populations in the SNHPC MPO Region**  
(Source: 2014-2018 American Community Survey 5-Year Estimates)

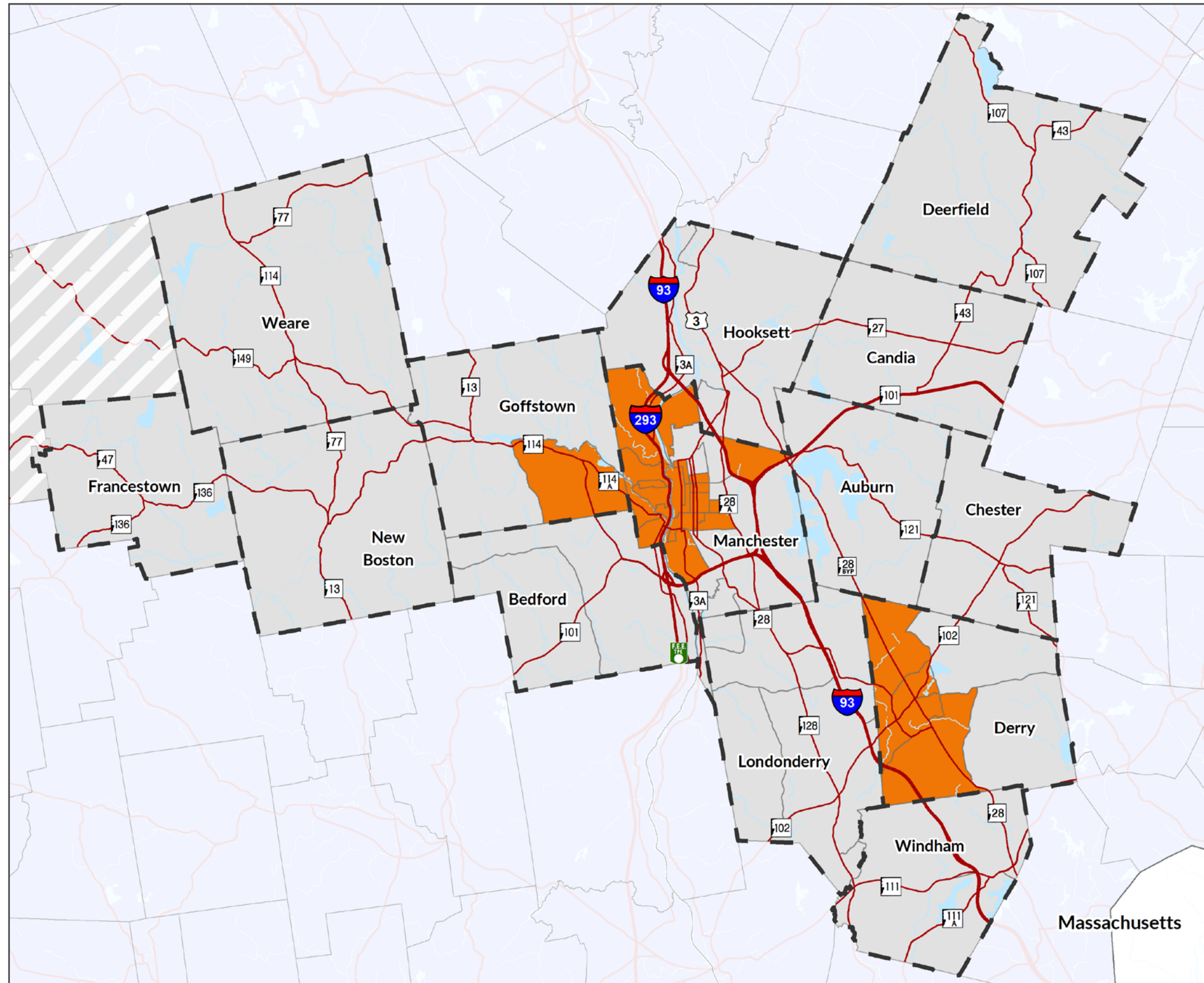
| Census Tract | Municipality                   | Total Population | Below 50% of Poverty Level | Below 125% of Poverty Level | Below 150% of Poverty Level | Below 200% of Poverty Level | Below Poverty Level | Percentage Below Poverty Level |
|--------------|--------------------------------|------------------|----------------------------|-----------------------------|-----------------------------|-----------------------------|---------------------|--------------------------------|
| 40           | Auburn                         | 5,385            | 87                         | 156                         | 219                         | 307                         | 97                  | 1.8%                           |
| 29.01        | Bedford                        | 7,647            | 62                         | 201                         | 281                         | 617                         | 189                 | 2.5%                           |
| 29.02        | Bedford                        | 5,811            | 64                         | 119                         | 421                         | 562                         | 119                 | 2.0%                           |
| 29.03        | Bedford                        | 8,354            | 27                         | 147                         | 147                         | 241                         | 85                  | 1.0%                           |
| 500          | Candia                         | 3,925            | 64                         | 177                         | 267                         | 470                         | 169                 | 4.3%                           |
| 510          | Chester                        | 4,976            | 67                         | 181                         | 256                         | 419                         | 159                 | 3.2%                           |
| 560          | Deerfield                      | 4,448            | 102                        | 356                         | 418                         | 510                         | 248                 | 5.6%                           |
| 33.01        | Derry                          | 4,495            | 77                         | 118                         | 263                         | 421                         | 117                 | 2.6%                           |
| 33.02        | Derry                          | 5,110            | 302                        | 566                         | 608                         | 755                         | 468                 | 9.2%                           |
| 34           | Derry                          | 5,284            | 240                        | 705                         | 802                         | 1,576                       | 551                 | 10.4%                          |
| 35           | Derry                          | 5,437            | 561                        | 1,068                       | 1,225                       | 1,579                       | 760                 | 14.0%                          |
| 36.01        | Derry                          | 6,643            | 542                        | 789                         | 911                         | 1,179                       | 678                 | 10.2%                          |
| 36.02        | Derry                          | 6,256            | 17                         | 94                          | 154                         | 173                         | 37                  | 0.6%                           |
| 215          | Francestown-Bennington-Deering | 5,004            | 94                         | 359                         | 457                         | 886                         | 256                 | 5.1%                           |
| 27.01        | Goffstown                      | 3,743            | 117                        | 221                         | 221                         | 253                         | 163                 | 4.4%                           |
| 27.02        | Goffstown                      | 5,922            | 84                         | 331                         | 349                         | 590                         | 209                 | 3.5%                           |
| 28           | Goffstown                      | 6,122            | 257                        | 889                         | 986                         | 1,713                       | 640                 | 10.5%                          |
| 30.01        | Hooksett                       | 3,932            | 60                         | 216                         | 250                         | 416                         | 155                 | 3.9%                           |
| 30.06        | Hooksett                       | 3,321            | 187                        | 408                         | 418                         | 594                         | 261                 | 7.9%                           |
| 442          | Hooksett                       | 6,145            | 134                        | 364                         | 553                         | 845                         | 195                 | 3.2%                           |
| 37.01        | Londonderry                    | 3,786            | 53                         | 238                         | 258                         | 371                         | 203                 | 5.4%                           |
| 37.03        | Londonderry                    | 5,708            | 41                         | 98                          | 200                         | 492                         | 77                  | 1.3%                           |
| 38.01        | Londonderry                    | 4,149            | 18                         | 62                          | 80                          | 203                         | 39                  | 0.9%                           |
| 38.02        | Londonderry                    | 4,207            | 70                         | 194                         | 198                         | 259                         | 169                 | 4.0%                           |
| 39.01        | Londonderry                    | 4,356            | 40                         | 120                         | 229                         | 688                         | 92                  | 2.1%                           |
| 39.02        | Londonderry                    | 3,292            | 15                         | 176                         | 255                         | 490                         | 153                 | 4.6%                           |
| 9800.1       | Londonderry                    | 0                | 0                          | 0                           | 0                           | 0                           | 0                   | 0.0%                           |
| 1.01         | Manchester                     | 2,922            | 105                        | 223                         | 331                         | 727                         | 206                 | 7.0%                           |
| 1.02         | Manchester                     | 4,300            | 491                        | 772                         | 858                         | 982                         | 636                 | 14.8%                          |
| 2.02         | Manchester                     | 2,403            | 128                        | 475                         | 521                         | 790                         | 421                 | 17.5%                          |
| 2.03         | Manchester                     | 3,471            | 200                        | 475                         | 588                         | 809                         | 388                 | 11.2%                          |
| 2.04         | Manchester                     | 5,036            | 432                        | 838                         | 912                         | 1,212                       | 667                 | 13.2%                          |
| 3            | Manchester                     | 2,941            | 240                        | 707                         | 900                         | 1,269                       | 550                 | 18.7%                          |
| 6            | Manchester                     | 2,114            | 128                        | 370                         | 395                         | 874                         | 243                 | 11.5%                          |
| 7            | Manchester                     | 2,844            | 111                        | 187                         | 248                         | 411                         | 146                 | 5.1%                           |
| 8            | Manchester                     | 2,058            | 157                        | 520                         | 749                         | 895                         | 387                 | 18.8%                          |
| 9.01         | Manchester                     | 3,364            | 92                         | 276                         | 471                         | 614                         | 215                 | 6.4%                           |
| 9.02         | Manchester                     | 5,706            | 417                        | 1,000                       | 1,047                       | 1,657                       | 713                 | 12.5%                          |
| 10           | Manchester                     | 5,591            | 60                         | 394                         | 474                         | 819                         | 337                 | 6.0%                           |
| 11           | Manchester                     | 5,240            | 144                        | 285                         | 324                         | 942                         | 177                 | 3.4%                           |
| 12           | Manchester                     | 1,687            | 27                         | 128                         | 376                         | 529                         | 100                 | 5.9%                           |
| 13           | Manchester                     | 2,979            | 169                        | 697                         | 983                         | 1,200                       | 561                 | 18.8%                          |
| 14           | Manchester                     | 2,137            | 414                        | 1,118                       | 1,272                       | 1,590                       | 949                 | 44.4%                          |
| 15           | Manchester                     | 2,856            | 533                        | 1,185                       | 1,381                       | 1,905                       | 863                 | 30.2%                          |
| 16           | Manchester                     | 4,761            | 489                        | 1,347                       | 1,726                       | 2,591                       | 1,306               | 27.4%                          |
| 17           | Manchester                     | 2,208            | 44                         | 490                         | 613                         | 1,045                       | 374                 | 16.9%                          |
| 18           | Manchester                     | 5,913            | 284                        | 1,166                       | 1,356                       | 1,742                       | 985                 | 16.7%                          |
| 19           | Manchester                     | 2,942            | 182                        | 946                         | 1,035                       | 1,227                       | 746                 | 25.4%                          |
| 20           | Manchester                     | 2,163            | 233                        | 785                         | 865                         | 1,265                       | 527                 | 24.4%                          |
| 21           | Manchester                     | 5,000            | 212                        | 957                         | 1,263                       | 2,026                       | 825                 | 16.5%                          |
| 22           | Manchester                     | 3,177            | 61                         | 559                         | 655                         | 1,000                       | 374                 | 11.8%                          |
| 23           | Manchester                     | 3,861            | 101                        | 752                         | 859                         | 1,109                       | 602                 | 15.6%                          |
| 24           | Manchester                     | 6,838            | 703                        | 1,878                       | 2,325                       | 2,685                       | 1,449               | 21.2%                          |
| 25           | Manchester                     | 5,363            | 260                        | 555                         | 858                         | 1,149                       | 366                 | 6.8%                           |
| 26           | Manchester                     | 6,009            | 50                         | 223                         | 323                         | 1,070                       | 105                 | 1.7%                           |
| 2004         | Manchester                     | 2,877            | 464                        | 1,040                       | 1,080                       | 1,390                       | 856                 | 29.8%                          |
| 9801         | Manchester                     | 0                | 0                          | 0                           | 0                           | 0                           | 0                   | 0.0%                           |
| 200          | New Boston                     | 5,616            | 35                         | 139                         | 178                         | 498                         | 100                 | 1.8%                           |
| 210          | Weare                          | 9,011            | 133                        | 557                         | 866                         | 1,393                       | 557                 | 6.2%                           |
| 1061         | Windham                        | 7,442            | 16                         | 114                         | 551                         | 618                         | 42                  | 0.6%                           |
| 1061         | Windham                        | 6,974            | 52                         | 52                          | 156                         | 523                         | 52                  | 0.7%                           |
|              | MPO Region                     | 271,262          | 10,549                     | 29,563                      | 36,965                      | 55,165                      | 23,114              | 8.5%                           |



Map # 3

## TITLE VI

### SNHPC MPO Region Low Income Population Concentrations



- Areas of Concentrated Poverty\*
- Other Census Tracts

\*Where more than 8.5%,  
the overall regional rate,  
of the population lives at  
or below the poverty level.



Created by the Southern New Hampshire Planning Commission, 2020. Figures reflect 2018 5-Year American Community Survey data. Sources: NH Department of Transportation; University of Minnesota; US Census Bureau; US Geological Survey.

0 1 2 4 Miles



Map # 4

## TITLE VI

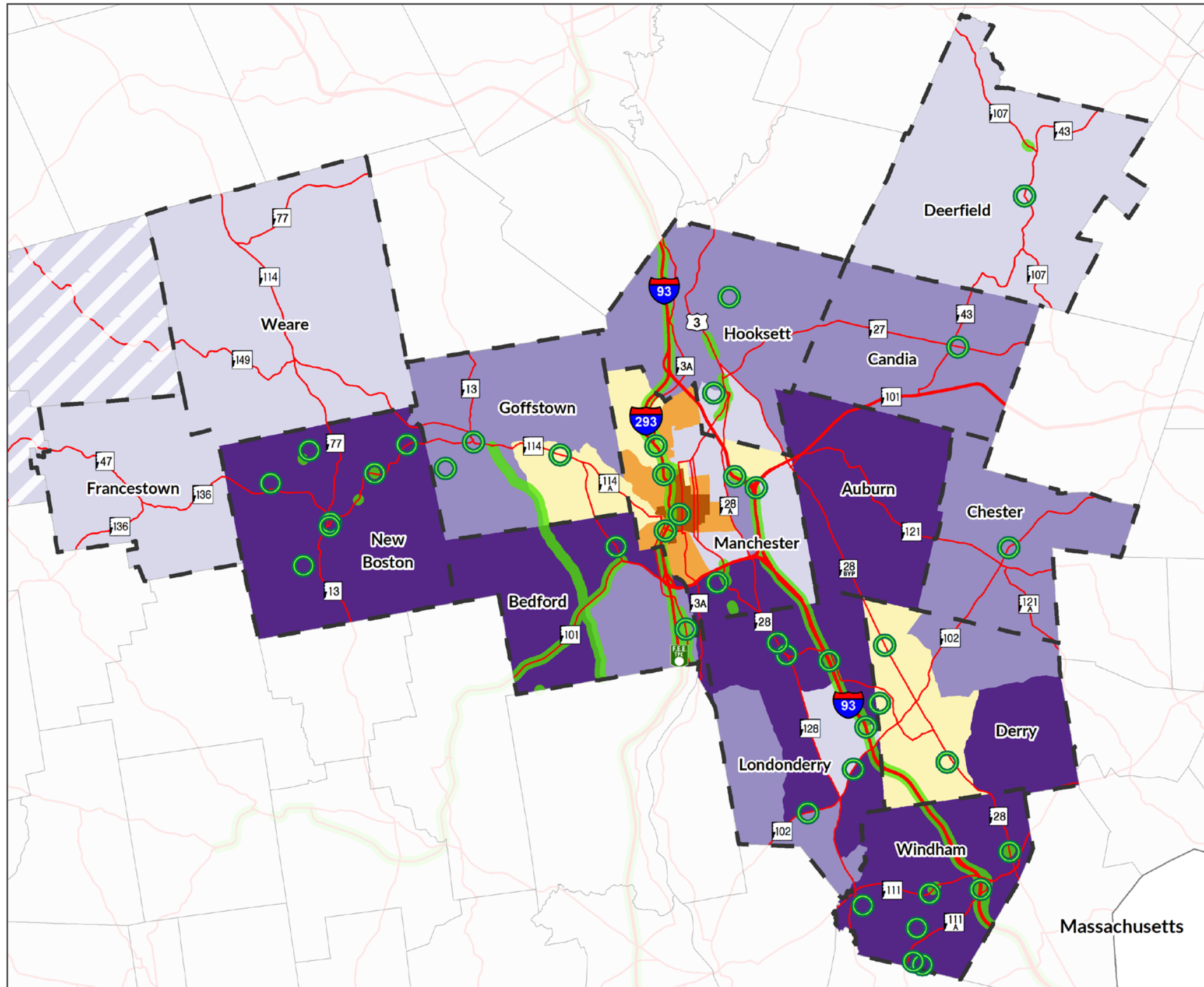
### Low Income Population and FY 2017 - FY 2040 Regional Transportation Plan Projects

Percentage Living at  
or Below the Poverty  
Level by Census Tract

- 0% - 2.1%
- 2.2% - 4.6%
- 4.7% - 8.5%
- 8.6% - 14%
- 14.1% - 21.2%
- 21.3% - 44.4%
- RTP Projects
- SNHPC Municipalities



Created by the Southern New Hampshire Planning Commission, 2020. Figures reflect 2018 5-Year American Community Survey data. Sources: NH Department of Transportation; University of Minnesota; US Census Bureau; US Geological Survey.





### 3.8 Requirement to Provide Meaningful Access to LEP Persons

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), the SNHPC MPO will take responsible steps to ensure meaningful access to benefits, services, information, and other important portions of its programs and activities for individuals who have Limited English Proficiency (LEP).

The following pages describe the four-part analysis of LEP populations described in the Federal Transit Administration guidance entitled "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers", prepared by the FTA Office of Civil Rights. These steps include: (1) identifying the number or 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) determining the frequency with which LEP individuals come in contact with the program; (3) defining the nature and importance of the program, activity, or service provided by the recipient to people's lives; and (4) describing the resources available to the recipient and costs.

*Identify the number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee;*

The SNHPC MPO has undertaken an analysis of the languages spoken in the 14 municipalities comprising the SNHPC region, and the estimated number of residents with Limited English Proficiency and their distribution by language group and census tract.

Table 3 shows data taken from the 2014-2018 American Community Survey 5-Year Estimates for primary language spoken at home for the MPO planning region. This table summarizes the most common languages spoken at home in the region, with a threshold of 0.05% of households.

The federal interagency website on Limited English Proficiency (LEP) ([www.lep.gov](http://www.lep.gov)) states that "*Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be limited English proficient, or 'LEP.' These individuals may be entitled to language assistance with respect to a particular type or service, benefit, or encounter.*"

Based on this definition, a total of 11,100 individuals in the SNHPC MPO planning region, or approximately 4.2% of the population, would be identified as having Limited English Proficiency. Divided among language groups, this includes 3,542 Spanish speakers (1.3% of the population), 4,185 speakers of Other Indo-European Languages (1.6% of the population), 2,073 speakers of Asian and Pacific Languages (0.8% of the population), and 1,300 speakers of Other Languages (0.5% of the population).

**Table 3 – Limited English Proficiency Populations in the SNHPC MPO Region**  
*(Source: 2014-2018 American Community Survey 5-Year Estimates)*

| Census Tract | Municipality                   | Population (5 yrs +) | English Only | English Only % | Spanish | LEP Spanish | LEP Spanish % | Other Indo-European | LEP Indo-European | LEP Indo-European % | Asian Pacific | LEP Asian Pacific | LEP Asian Pacific % | Other Languages | LEP Other Languages | LEP Other Languages % | Total LEP | LEP % |
|--------------|--------------------------------|----------------------|--------------|----------------|---------|-------------|---------------|---------------------|-------------------|---------------------|---------------|-------------------|---------------------|-----------------|---------------------|-----------------------|-----------|-------|
| 40           | Auburn                         | 5,118                | 4,881        | 95.4%          | 87      | 0           | 0.0%          | 111                 | 8                 | 0.2%                | 39            | 0                 | 0.0%                | 0               | 0                   | 0.0%                  | 8         | 0.2%  |
| 29.01        | Bedford                        | 7,268                | 6,587        | 90.6%          | 91      | 14          | 0.2%          | 401                 | 7                 | 0.1%                | 189           | 50                | 0.7%                | 0               | 0                   | 0.0%                  | 71        | 1.0%  |
| 29.02        | Bedford                        | 5,828                | 5,491        | 94.2%          | 60      | 0           | 0.0%          | 262                 | 49                | 0.8%                | 15            | 15                | 0.3%                | 0               | 0                   | 0.0%                  | 64        | 1.1%  |
| 29.03        | Bedford                        | 7,664                | 7,406        | 96.6%          | 0       | 0           | 0.0%          | 135                 | 33                | 0.4%                | 93            | 26                | 0.3%                | 30              | 0                   | 0.0%                  | 59        | 0.8%  |
| 500          | Candia                         | 3,748                | 3,484        | 93.0%          | 56      | 6           | 0.2%          | 170                 | 26                | 0.7%                | 11            | 0                 | 0.0%                | 27              | 0                   | 0.0%                  | 32        | 0.9%  |
| 510          | Chester                        | 4,835                | 4,481        | 92.7%          | 122     | 23          | 0.5%          | 107                 | 12                | 0.2%                | 125           | 0                 | 0.0%                | 0               | 0                   | 0.0%                  | 35        | 0.7%  |
| 560          | Deerfield                      | 4,306                | 4,157        | 96.5%          | 26      | 0           | 0.0%          | 123                 | 5                 | 0.1%                | 0             | 0                 | 0.0%                | 0               | 0                   | 0.0%                  | 5         | 0.1%  |
| 33.01        | Derry                          | 4,355                | 4,224        | 97.0%          | 49      | 6           | 0.1%          | 69                  | 0                 | 0.0%                | 13            | 0                 | 0.0%                | 0               | 0                   | 0.0%                  | 6         | 0.1%  |
| 33.02        | Derry                          | 4,783                | 4,137        | 86.5%          | 298     | 130         | 2.7%          | 277                 | 130               | 2.7%                | 71            | 58                | 1.2%                | 0               | 0                   | 0.0%                  | 318       | 6.6%  |
| 34           | Derry                          | 5,303                | 5,019        | 94.6%          | 15      | 0           | 0.0%          | 218                 | 43                | 0.8%                | 39            | 39                | 0.7%                | 12              | 0                   | 0.0%                  | 82        | 1.5%  |
| 35           | Derry                          | 5,152                | 4,964        | 96.4%          | 70      | 0           | 0.0%          | 118                 | 67                | 1.3%                | 0             | 0                 | 0.0%                | 0               | 0                   | 0.0%                  | 67        | 1.3%  |
| 36.01        | Derry                          | 6,371                | 6,253        | 98.1%          | 57      | 21          | 0.3%          | 61                  | 17                | 0.3%                | 0             | 0                 | 0.0%                | 0               | 0                   | 0.0%                  | 38        | 0.6%  |
| 36.02        | Derry                          | 5,999                | 5,487        | 91.5%          | 277     | 58          | 1.0%          | 147                 | 32                | 0.5%                | 61            | 35                | 0.6%                | 27              | 16                  | 0.0%                  | 141       | 2.4%  |
| 215          | Francestown-Bennington-Deering | 4,791                | 4,660        | 97.3%          | 43      | 13          | 0.3%          | 77                  | 26                | 0.5%                | 8             | 0                 | 0.0%                | 3               | 0                   | 0.0%                  | 39        | 0.8%  |
| 27.01        | Goffstown                      | 3,526                | 3,313        | 94.0%          | 67      | 0           | 0.0%          | 146                 | 41                | 1.2%                | 0             | 0                 | 0.0%                | 0               | 0                   | 0.0%                  | 41        | 1.2%  |
| 27.02        | Goffstown                      | 5,522                | 5,131        | 92.9%          | 17      | 0           | 0.0%          | 322                 | 50                | 0.9%                | 34            | 23                | 0.4%                | 18              | 0                   | 0.0%                  | 73        | 1.3%  |
| 28           | Goffstown                      | 8,100                | 7,390        | 91.2%          | 142     | 38          | 0.5%          | 528                 | 85                | 1.0%                | 18            | 6                 | 0.1%                | 22              | 0                   | 0.0%                  | 129       | 1.6%  |
| 30.01        | Hooksett                       | 3,995                | 3,790        | 94.9%          | 51      | 0           | 0.0%          | 138                 | 20                | 0.5%                | 0             | 0                 | 0.0%                | 16              | 0                   | 0.0%                  | 20        | 0.5%  |
| 30.06        | Hooksett                       | 3,682                | 3,174        | 86.2%          | 132     | 0           | 0.0%          | 347                 | 112               | 3.0%                | 10            | 10                | 0.3%                | 19              | 0                   | 0.0%                  | 122       | 3.3%  |
| 442          | Hooksett                       | 5,949                | 5,540        | 93.1%          | 26      | 0           | 0.0%          | 345                 | 47                | 0.8%                | 0             | 0                 | 0.0%                | 38              | 6                   | 0.0%                  | 53        | 0.9%  |
| 37.01        | Londonderry                    | 3,669                | 3,464        | 94.4%          | 90      | 33          | 0.9%          | 89                  | 19                | 0.5%                | 20            | 20                | 0.5%                | 6               | 6                   | 0.0%                  | 78        | 2.1%  |
| 37.03        | Londonderry                    | 5,436                | 4,983        | 91.7%          | 57      | 17          | 0.3%          | 349                 | 72                | 1.3%                | 47            | 0                 | 0.0%                | 0               | 0                   | 0.0%                  | 89        | 1.6%  |
| 38.01        | Londonderry                    | 3,970                | 3,782        | 95.3%          | 47      | 32          | 0.8%          | 141                 | 22                | 0.6%                | 0             | 0                 | 0.0%                | 0               | 0                   | 0.0%                  | 54        | 1.4%  |
| 38.02        | Londonderry                    | 4,013                | 3,887        | 96.9%          | 17      | 1           | 0.0%          | 107                 | 4                 | 0.1%                | 2             | 0                 | 0.0%                | 0               | 0                   | 0.0%                  | 5         | 0.1%  |
| 39.01        | Londonderry                    | 4,076                | 3,896        | 95.6%          | 87      | 38          | 0.9%          | 82                  | 13                | 0.3%                | 11            | 0                 | 0.0%                | 0               | 0                   | 0.0%                  | 51        | 1.3%  |
| 39.02        | Londonderry                    | 3,182                | 2,903        | 91.2%          | 183     | 29          | 0.9%          | 58                  | 0                 | 0.0%                | 27            | 0                 | 0.0%                | 11              | 0                   | 0.0%                  | 29        | 0.9%  |
| 9800.1       | Londonderry                    | 0                    | 0            | 0.0%           | 0       | 0           | 0.0%          | 0                   | 0                 | 0.0%                | 0             | 0                 | 0.0%                | 0               | 0                   | 0.0%                  | 0         | 0.0%  |
| 1.01         | Manchester                     | 2,813                | 2,547        | 90.5%          | 93      | 37          | 1.3%          | 142                 | 62                | 2.2%                | 28            | 14                | 0.5%                | 3               | 0                   | 0.0%                  | 113       | 4.0%  |
| 1.02         | Manchester                     | 4,942                | 4,131        | 83.6%          | 94      | 32          | 0.6%          | 416                 | 33                | 0.7%                | 263           | 107               | 2.2%                | 38              | 0                   | 0.0%                  | 172       | 3.5%  |
| 2.02         | Manchester                     | 2,224                | 1,969        | 88.5%          | 26      | 9           | 0.4%          | 183                 | 53                | 2.4%                | 6             | 0                 | 0.0%                | 40              | 40                  | 0.0%                  | 102       | 4.6%  |
| 2.03         | Manchester                     | 3,379                | 2,773        | 82.1%          | 151     | 135         | 4.0%          | 356                 | 108               | 3.2%                | 57            | 0                 | 0.0%                | 42              | 11                  | 0.0%                  | 254       | 7.5%  |
| 2.04         | Manchester                     | 4,713                | 3,424        | 72.7%          | 126     | 40          | 0.8%          | 517                 | 211               | 4.5%                | 356           | 43                | 0.9%                | 290             | 227                 | 0.0%                  | 521       | 11.1% |
| 3            | Manchester                     | 2,665                | 2,188        | 82.1%          | 257     | 106         | 4.0%          | 205                 | 118               | 4.4%                | 0             | 0                 | 0.0%                | 15              | 7                   | 0.0%                  | 231       | 8.7%  |
| 6            | Manchester                     | 2,071                | 1,648        | 79.6%          | 107     | 78          | 3.8%          | 73                  | 11                | 0.5%                | 243           | 166               | 8.0%                | 0               | 0                   | 0.0%                  | 255       | 12.3% |
| 7            | Manchester                     | 2,719                | 2,553        | 93.9%          | 66      | 6           | 0.2%          | 94                  | 10                | 0.4%                | 6             | 0                 | 0.0%                | 0               | 0                   | 0.0%                  | 16        | 0.6%  |
| 8            | Manchester                     | 2,226                | 1,809        | 81.3%          | 184     | 9           | 0.4%          | 221                 | 62                | 2.8%                | 12            | 9                 | 0.4%                | 0               | 0                   | 0.0%                  | 80        | 3.6%  |

| Census Tract | Municipality | Population (5 yrs +) | English Only | English Only % | Spanish | LEP Spanish | LEP Spanish % | Other Indo-European | LEP Indo-European | LEP Indo-European % | Asian Pacific | LEP Asian Pacific | LEP Asian Pacific % | Other Languages | LEP Other Languages | LEP Other Languages % | Total LEP | LEP % |
|--------------|--------------|----------------------|--------------|----------------|---------|-------------|---------------|---------------------|-------------------|---------------------|---------------|-------------------|---------------------|-----------------|---------------------|-----------------------|-----------|-------|
| 9.01         | Manchester   | 3,242                | 2,710        | 83.6%          | 305     | 83          | 2.6%          | 150                 | 34                | 1.0%                | 59            | 45                | 1.4%                | 18              | 0                   | 0.0%                  | 162       | 5.0%  |
| 9.02         | Manchester   | 5,264                | 4,096        | 77.8%          | 238     | 71          | 1.3%          | 391                 | 107               | 2.0%                | 309           | 204               | 3.9%                | 230             | 102                 | 0.0%                  | 484       | 9.2%  |
| 10           | Manchester   | 5,676                | 5,122        | 90.2%          | 6       | 6           | 0.1%          | 380                 | 51                | 0.9%                | 109           | 97                | 1.7%                | 59              | 20                  | 0.0%                  | 174       | 3.1%  |
| 11           | Manchester   | 5,107                | 4,138        | 81.0%          | 110     | 9           | 0.2%          | 523                 | 312               | 6.1%                | 52            | 25                | 0.5%                | 284             | 70                  | 0.0%                  | 416       | 8.1%  |
| 12           | Manchester   | 1,746                | 1,487        | 85.2%          | 92      | 22          | 1.3%          | 121                 | 42                | 2.4%                | 16            | 0                 | 0.0%                | 30              | 14                  | 0.0%                  | 78        | 4.5%  |
| 13           | Manchester   | 2,819                | 2,084        | 73.9%          | 331     | 188         | 6.7%          | 248                 | 18                | 0.6%                | 127           | 103               | 3.7%                | 29              | 28                  | 0.0%                  | 337       | 12.0% |
| 14           | Manchester   | 2,105                | 1,286        | 61.1%          | 381     | 175         | 8.3%          | 143                 | 96                | 4.6%                | 35            | 28                | 1.3%                | 260             | 105                 | 0.0%                  | 404       | 19.2% |
| 15           | Manchester   | 2,585                | 1,565        | 60.5%          | 538     | 425         | 16.4%         | 330                 | 205               | 7.9%                | 0             | 0                 | 0.0%                | 152             | 152                 | 0.0%                  | 782       | 30.3% |
| 16           | Manchester   | 4,198                | 2,670        | 63.6%          | 644     | 268         | 6.4%          | 429                 | 278               | 6.6%                | 232           | 186               | 4.4%                | 223             | 131                 | 0.0%                  | 863       | 20.6% |
| 17           | Manchester   | 2,115                | 1,667        | 78.8%          | 319     | 59          | 2.8%          | 95                  | 32                | 1.5%                | 34            | 3                 | 0.1%                | 0               | 0                   | 0.0%                  | 94        | 4.4%  |
| 18           | Manchester   | 5,570                | 4,891        | 87.8%          | 204     | 35          | 0.6%          | 357                 | 136               | 2.4%                | 117           | 80                | 1.4%                | 1               | 0                   | 0.0%                  | 251       | 4.5%  |
| 19           | Manchester   | 3,198                | 2,337        | 73.1%          | 490     | 277         | 8.7%          | 242                 | 51                | 1.6%                | 35            | 24                | 0.8%                | 94              | 46                  | 0.0%                  | 398       | 12.4% |
| 20           | Manchester   | 2,014                | 1,378        | 68.4%          | 318     | 158         | 7.8%          | 253                 | 143               | 7.1%                | 13            | 13                | 0.6%                | 52              | 40                  | 0.0%                  | 354       | 17.6% |
| 21           | Manchester   | 4,779                | 3,677        | 76.9%          | 461     | 114         | 2.4%          | 561                 | 244               | 5.1%                | 31            | 0                 | 0.0%                | 49              | 29                  | 0.0%                  | 387       | 8.1%  |
| 22           | Manchester   | 2,968                | 2,497        | 84.1%          | 171     | 67          | 2.3%          | 196                 | 57                | 1.9%                | 36            | 9                 | 0.3%                | 68              | 67                  | 0.0%                  | 200       | 6.7%  |
| 23           | Manchester   | 3,699                | 3,216        | 86.9%          | 87      | 31          | 0.8%          | 209                 | 107               | 2.9%                | 96            | 56                | 1.5%                | 91              | 43                  | 0.0%                  | 237       | 6.4%  |
| 24           | Manchester   | 6,469                | 4,774        | 73.8%          | 505     | 248         | 3.8%          | 876                 | 359               | 5.5%                | 13            | 13                | 0.2%                | 301             | 140                 | 0.0%                  | 760       | 11.7% |
| 25           | Manchester   | 5,206                | 4,344        | 83.4%          | 0       | 0           | 0.0%          | 579                 | 143               | 2.7%                | 268           | 175               | 3.4%                | 15              | 0                   | 0.0%                  | 318       | 6.1%  |
| 26           | Manchester   | 5,731                | 4,818        | 84.1%          | 337     | 95          | 1.7%          | 221                 | 57                | 1.0%                | 315           | 243               | 4.2%                | 40              | 0                   | 0.0%                  | 395       | 6.9%  |
| 2004         | Manchester   | 2,817                | 2,385        | 84.7%          | 228     | 163         | 5.8%          | 58                  | 13                | 0.5%                | 134           | 122               | 4.3%                | 12              | 0                   | 0.0%                  | 298       | 10.6% |
| 9801         | Manchester   | 0                    | 0            | 0.0%           | 0       | 0           | 0.0%          | 0                   | 0                 | 0.0%                | 0             | 0                 | 0.0%                | 0               | 0                   | 0.0%                  | 0         | 0.0%  |
| 200          | New Boston   | 5,285                | 5,137        | 97.2%          | 68      | 38          | 0.7%          | 73                  | 0                 | 0.0%                | 7             | 0                 | 0.0%                | 0               | 0                   | 0.0%                  | 38        | 0.7%  |
| 210          | Weare        | 8,571                | 8,266        | 96.4%          | 100     | 33          | 0.4%          | 205                 | 51                | 0.6%                | 0             | 0                 | 0.0%                | 0               | 0                   | 0.0%                  | 84        | 1.0%  |
| 1061         | Windham      | 7,165                | 6,582        | 91.9%          | 184     | 0           | 0.0%          | 271                 | 16                | 0.2%                | 49            | 26                | 0.4%                | 79              | 0                   | 0.0%                  | 42        | 0.6%  |
| 1061         | Windham      | 6,593                | 6,246        | 94.7%          | 87      | 66          | 1.0%          | 191                 | 25                | 0.4%                | 28            | 0                 | 0.0%                | 41              | 0                   | 0.0%                  | 91        | 1.4%  |
|              | MPO Region   | 263,315              | 232,899      | 88.4%          | 9,475   | 3,542       | 1.3%          | 14,237              | 4,185             | 1.6%                | 3,919         | 2,073             | 0.8%                | 2,785           | 1,300               | 0.5%                  | 11,100    | 4.2%  |

Determine the frequency with which LEP individuals come in contact with the program

Key points of contact between the MPO and members of the public in the MPO region include the following: public hearings, other public meetings, the MPO website, inquiries with the MPO office and staff regarding local or regional project needs, and local or regional surveys designed to gather information to inform decision making.

During the past ten years there have been no inquiries with MPO staff by residents of the region regarding the availability of interpretation services for meetings, or documents in translation to other languages to benefit LEP individuals.

Define the nature and importance of the program, activity, or service provided by the recipient to people's lives

An MPO's regional planning activities impact every person in the MPO region to one degree or another. Projects reviewed by the MPO and recommended to NHDOT for funding impact the safety and travel time for all members of the driving public. Similarly, the MPO works to develop regional coordinated public transit and human service transportation plans helps to address mobility and access needs for a range of transit dependent populations, which may include LEP persons as well as seniors, individuals with disabilities, youth, and low-income populations.

Describe the resources available to the recipient and costs

The SNHPC MPO has previously consulted with several agencies to identify common practices in New Hampshire for working with LEP populations, including the NH Department of Transportation, The International Institute of New Hampshire in Manchester (IINH), The New Hampshire Catholic Charities Immigration Office, Manchester Transit Authority, Manchester Health Department, and Greater Derry Community Health Services (CHS). Based on these contacts the MPO will utilize telephonic interpretation services identified by the NHDOT. The MPO has also identified interpretation services available through the Southern NH Area Health Education Center, used by CHS for medical interpretation. The SNHPC's Unified Planning Work Program (UPWP) with the NHDOT would be the main source of financial resources available to the MPO for expanding language access. The MPO has recently update its website and incorporated Google Translate technology. The MPO anticipates that web-based technologies such as Google Translate will make the cost of document translation relatively modest. Live interpretation services are anticipated to be more costly.

USDOT LEP Guidance identifies 1,000 individuals or 5% of the population eligible to be served falling within a specific LEP language group as a threshold above which vital documents should be provided in translation. Based on the 2014-2018 American Community Survey 5-Year Estimates for primary language, the MPO will develop a Language Assistance Plan to identify strategies for expanding access to language assistance as well as key MPO documents for LEP individuals, with an emphasis on the Spanish speaking population.

### **3.9 Minority Representation on Planning and Advisory Bodies**

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program."

The key advisory and policy-making bodies for the MPO are the MPO Technical Advisory Committee (TAC) and the MPO Policy Committee. The TAC is made up of representatives from each MPO community plus representatives of State and Federal agencies, neighboring MPOs, the Manchester-Boston Regional Airport, MTA and CART. The Policy Committee is similarly made up of Commissioners to the SNHPC appointed by each member community, representatives of State and Federal agencies, the MTA and CART. The individuals representing each of these municipalities or agencies are selected by those entities, and are not chosen at the discretion of the MPO or its staff. Full membership of the MPO TAC and Policy Committees is detailed in Appendix D.

### **3.10 Providing Assistance to Sub-recipients**

The SNHPC MPO is itself a sub-recipient of Federal assistance, with the NH Department of Transportation serving as the primary recipient and passing through FTA Section 5305(d) and FHWA metropolitan planning funding to the region.

The SNHPC MPO acts as the Lead Agency for the administration of FTA Section 5310 Purchase of Service and Formula Funds on behalf of the Region 8/9 Coordinating Council for Community Transportation. The current sub-recipients of this funding are the Manchester Transit Authority, Easter Seals of New Hampshire, Rockingham Nutrition Meals on Wheels, and Catholic Charities. The SNHPC MPO will collect Title VI Assurances from sub-recipients prior to passing through federal funds.

The MPO does enter into contracts with municipalities and private consulting firms involving Federal funding. In all cases these contracts incorporate standard Certifications and Assurances related to Title VI Civil Rights responsibilities.

The MPO also provides assistance to the region's public transportation and human service transportation agencies, including MTA and Easter Seals of New Hampshire, in developing demographic analyses in support of their Title VI and Disadvantaged Business Enterprise (DBE) program development.

### **3.11 Monitoring Sub-recipients**

The MPO recognizes the obligation to ensure sub-recipients are in compliance with Title VI requirements, and would undertake the following activities to ensure that compliance:

- a) Document the process for ensuring that all subrecipients are complying with the general reporting requirements of this circular, as well as other requirements that apply to the subrecipient based on the type of entity and the number of fixed route vehicles it operates in peak service if a transit provider.
- b) Collect Title VI Programs from subrecipients and review programs for compliance.
- c) At the request of FTA, in response to a complaint of discrimination, request that subrecipients who provide transportation services verify that their level and quality of service is provided on an equitable basis.

### **3.12 Determination of Site or Location of Facilities**

Title 49 CFR Section 21.9(b)(3) states, *“In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part.”* Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, *“The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.”*

Per FTA Circular 4702.1B, “facilities” included in this provision are defined narrowly to exclude bus shelters, which are transit amenities; or larger projects such as bus stations or guideways subject to the NEPA process. Rather this section includes, but is not limited to, storage facilities, maintenance facilities, operations centers, etc. The MPO is not typically involved with site selection for projects of this sort.

Should the MPO at some point in the future be involved with this sort of support facility development, the MPO acknowledges its responsibility to complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. This process would include outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis would compare the equity impacts of various siting alternatives and occur before the selection of the preferred site.

### **3.13 Requirement to Provide Additional Information Upon Request**

The MPO will provide information other than that required by Circular 4702.1B to FTA upon request, should it be necessary to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI.

### **3.14 Annual Reporting of Accomplishments**

The MPO will prepare a document with Title VI accomplishments from the prior year, such as language requests, goals and achievements. The Title VI Accomplishments Report shall be submitted to the NHDOT by September 1st of each year.

## **4.0 REQUIREMENTS FOR METROPOLITAN PLANNING ORGANIZATIONS**

In addition to the above requirements of all recipients of Federal funding, FTA Circular 4702.1B identifies the following requirements for Metropolitan Planning Organizations.

### **4.1 Requirement that Metropolitan Planning Activities Comply With Title VI**

The SNHPC MPO recognizes that all metropolitan transportation planning activities must comply with 49 U.S.C. Section 5303, Metropolitan Transportation Planning, as well as subpart C of 23 CFR part 450, Metropolitan Transportation Planning and Programming. In its regional transportation planning capacity, the MPO will submit to the State as the primary recipient, FTA and FHWA:

- a) Documentation of compliance with the twelve general requirements for all recipients of Federal funding.

*Discussion of the basic requirements of all recipients is included in Section 3.0 above. This plan serves as the referenced documentation.*

- b) A demographic profile of the metropolitan area that includes identification of the locations of minority populations in the aggregate;

*Analysis of minority, low income and Limited English Proficiency (LEP) populations in the MPO region is addressed in Sections 3.7 and 3.8 above.*

- c) A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process;

*A summary of MPO public participation procedures designed to gather information on the mobility needs of minority populations, individuals with disabilities, and low-income residents is described in Section 3.6 above.*

- d) Where necessary, provide member agencies with regional data to assist them in identifying minority populations in their service area.

*All MPO member communities and agencies are provided MPO demographic analyses of minority and other populations included here, and this information is also incorporated into the two Coordinated Public Transit/Human Services Transportation Plans covering the MPO region. As noted above, the MPO also provides technical assistance to the Manchester Transit Authority and Easter Seals in developing their Title VI demographic analyses.*

### **4.2 Requirements for Program Administration**

The Executive Director of the Southern New Hampshire Planning Commission is responsible for ensuring the MPO fulfills its Title VI obligations through effective management and implementation of this program. The Title VI Coordinator is responsible for providing direct oversight in implementing the Title VI program and ensuring enforcement measures are carried out as appropriate in accordance with

the Standard Assurances.

In order to comply with 49 CFR Section 21.5, the general nondiscrimination provision, the MPO recognizes its responsibility to document that, if Federal funds under any FTA or FHWA programs are passed through to sub-recipients, this is done without regard to race, color, or national origin; and to assure that minority populations are not being denied the benefits of or excluded from participation in these programs.

As noted above, the MPO is itself a sub-recipient of Federal funding passed through the New Hampshire Department of Transportation, and has several sub-recipients of Section 5310 funding for elderly and disabled transportation services. While the MPO plays a role in prioritizing projects at the regional level for the regional Transportation Improvement Program (TIP) or specific funding programs such as Congestion Mitigation and Air Quality (CMAQ), in most cases actual programming authority is maintained by the NH Department of Transportation.

However, it is noted that the SNHPC will be a coordinating agency in the implementation of programming authority for Surface Transportation Block Grant funding for areas over 200,000 persons sub-allocated for use in the Nashua Urbanized Area. As part of this programming authority, the MPO will prepare and maintain the following information, and report it to NHDOT, FTA or FHWA if requested:

- a. A record of funding requests received from private non-profit organizations, State or local governmental authorities, and Indian tribes. The record shall identify those applicants that would use grant program funds to provide assistance to predominantly minority populations. The record shall also indicate which applications were rejected and accepted for funding.
- b. A description of how the MPO develops its competitive selection process or annual program of projects submitted as part of its grant applications. This description shall emphasize the method used to ensure the equitable distribution of funds to sub-recipients serving predominantly minority populations, including Native American tribes, where present. Equitable distribution can be achieved by engaging in outreach to diverse stakeholders regarding availability of funds, and ensuring the competitive process is not itself a barrier to selection of minority applicants.
- c. A description of the MPO's criteria for selecting entities to participate in federal grant programs.



# **APPENDIX A – TITLE VI NOTICE TO THE PUBLIC**

## **Title VI Notice to Public**

It is the policy of the Southern New Hampshire Planning Commission (SNHPC) Metropolitan Planning Organization (MPO) to effectuate Title VI of the Civil Rights Act of 1964, as amended, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all Federal programs and activities. Pursuant to this obligation, no person shall, on the grounds of race, color, national origin, sex, creed, or income status be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination in any program or activity carried out by the MPO. The MPO will also monitor and enforce statutory requirements imposed on any sub-recipients and participants of Federally assisted programs and projects. The MPO further assures that every effort will be made to ensure nondiscrimination in all of its programs and operations, regardless of funding source.

The SNHPC MPO operates without regard to race, color, national origin, sex, creed, or income status. MPO meetings are held in accessible locations, and reasonable accommodations are made for individuals with disabilities upon request within a reasonable advance notice period (usually two weeks or 10 business days). If you would like accessibility or language accommodation for any SNHPC MPO meeting, please contact:

Linda Moore-O'Brien  
Southern New Hampshire Planning Commission  
438 Dubuque Street  
Manchester, NH 03102  
PH: 603-669-4664, x301  
Email: [lmoore-o'brien@snhpc.org](mailto:lmoore-o'brien@snhpc.org)

If you feel you have been discriminated against based on your race, color, national origin, sex, creed, or income status, you may file a complaint using the SNHPC MPO Title VI Complaint Form. If you cannot download the document or need additional information, please feel free to contact the Southern New Hampshire Planning Commission at 603-669-4664.

Alternatively, you may file a complaint by contacting the FTA Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

## **Title VI Notice to the Public in Spanish Translation**

Es la política de la Comisión de Planificación Southern New Hampshire (SNHPC) de la Organización de Planificación Metropolitana (MPO) para efectuar el Título VI del Acta de Derechos Civiles de 1964, según enmendada, la Ley de Restauración de Derechos Civiles de 1987, y los estatutos y reglamentos en todos los programas federales y actividades. En cumplimiento de esta obligación, ninguna persona, por motivos de raza, color, origen nacional, sexo, credo, o estado de ingresos será excluido de participar en, ser negado los beneficios de, ni será sujeta a discriminación en cualquier programa o actividad llevada a cabo por el MPO. La MPO también vigilar y hacer cumplir los requisitos obligatorios establecidos en las sub-beneficiarios y participantes de los programas de asistencia federal y proyectos. MPO asegura además que cada esfuerzo será hecho para asegurar la no discriminación en todos sus programas y operaciones, independientemente de la fuente de financiación.

La Comisión de Planificación Southern New Hampshire Organización de Planificación Metropolitana opera sin distinción de raza, color, origen nacional, sexo, credo, o estado de ingresos. MPO reuniones se llevan a cabo en lugares accesibles y razonables se hacen para las personas con discapacidad que lo soliciten dentro de un plazo de preaviso razonable (generalmente dos semanas o 10 días hábiles). Si desea alojamiento accesibilidad o el idioma

para las reuniones MPO SNHPC, por favor póngase en contacto con el administrador de la oficina de SNHPC en 603-669-4664, extensión 301 o por correo electrónico: lmoore-o'brien@snhpc.org.

Si usted siente que ha sido discriminado por su raza, color, origen nacional, sexo, credo, o estado de ingresos, usted puede presentar una queja siguiendo la forma MPO SNHPC queja del Título VI. Si usted no puede descargar el documento o necesita información adicional, por favor no dude en ponerse en contacto con la Comisión de Planificación en Southern New Hampshire 603-669-4664.

Alternativamente, usted puede presentar una queja contactando FTA Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

## **APPENDIX B – TITLE VI CERTIFICATIONS AND ASSURANCES**

**FEDERAL FISCAL YEAR 2020 CERTIFICATIONS AND ASSURANCES FOR FTA  
ASSISTANCE PROGRAMS**

(Signature pages alternate to providing Certifications and Assurances in TrAMS.)

Name of Applicant: Southern NH Planning Commission

The Applicant certifies to the applicable provisions of categories 01–20.   X  

*Or,*

The Applicant certifies to the applicable provisions of the categories it has selected:

| <b>Category</b>  | <b>Certification</b> |
|--|----------------------|
| 01    Certifications and Assurances Required of Every Applicant  | <hr/>                |
| 02    Public Transportation Agency Safety Plans  | <hr/>                |
| 03    Tax Liability and Felony Convictions   | <hr/>                |
| 04    Lobbying   | <hr/>                |
| 05    Private Sector Protections   | <hr/>                |
| 06    Transit Asset Management Plan  | <hr/>                |
| 07    Rolling Stock Buy America Reviews and Bus Testing  | <hr/>                |
| 08    Urbanized Area Formula Grants Program  | <hr/>                |
| 09    Formula Grants for Rural Areas   | <hr/>                |
| 10    Fixed Guideway Capital Investment Grants and the Expedited<br>Project Delivery for Capital Investment Grants Pilot Program | <hr/>                |
| 11    Grants for Buses and Bus Facilities and Low or No Emission<br>Vehicle Deployment Grant Programs                            | <hr/>                |

- 12 Enhanced Mobility of Seniors and Individuals with Disabilities Programs
- 13 State of Good Repair Grants
- 14 Infrastructure Finance Programs
- 15 Alcohol and Controlled Substances Testing
- 16 Rail Safety Training and Oversight
- 17 Demand Responsive Service
- 18 Interest and Financing Costs
- 19 Construction Hiring Preferences
- 20 Cybersecurity Certification for Rail Rolling Stock and Operations

**FEDERAL FISCAL YEAR 2020 FTA CERTIFICATIONS AND ASSURANCES SIGNATURE**

**PAGE**

(Required of all Applicants for federal assistance to be awarded by FTA in FY 2020)

**AFFIRMATION OF APPLICANT**

Name of the Applicant: Southern NH Planning Commission

BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in federal fiscal year 2020, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it.

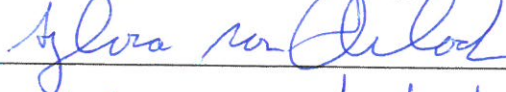
FTA intends that the Certifications and Assurances the Applicant selects on the other side of this document should apply to each Award for which it now seeks, or may later seek federal assistance to be awarded during federal fiscal year 2020.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 *et seq.*, and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute

Certifications and Assurances

Fiscal Year 2020

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

Signature  Date: 3/19/20

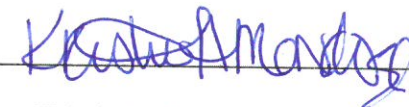
Name Sylvia von Aubock Authorized Representative of Applicant

AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): Southern NH Planning Commission

As the undersigned Attorney for the above-named Applicant, I hereby affirm to the Applicant that it has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it.

I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.

Signature  Date: March 19, 2020

Name Kristin A. Mendoza Attorney for Applicant

*Each Applicant for federal assistance to be awarded by FTA must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its electronic signature in lieu of the Attorney's signature within TrAMS, provided the Applicant has on file and uploaded to TrAMS this hard-copy Affirmation, signed by the attorney and dated this federal fiscal year.*

## **APPENDIX C – TITLE VI COMPLAINT FORM AND INVESTIGATIVE 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 Southern New Hampshire Planning Commission.

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 RPC 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 statutes may file a written complaint to the following address:

**Linda Moore-O'Brien  
Title VI Coordinator  
Southern New Hampshire Planning Commission  
438 Dubuque Street  
Manchester, NH 03102  
Phone: (603) 669-4664  
[lmoore-o'brien@snhpc.org](mailto:lmoore-o'brien@snhpc.org)**

Alternatively, written complaints may be filed directly with the Federal Transit Administration (FTA) at the following address:

**FTA Office of Civil Rights  
Attention: Title VI Program Coordinator  
East Building, 5<sup>th</sup> Floor-TCR  
1200 New Jersey Avenue, SE  
Washington, DC 20590**

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

- 1.) 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, creed, national origin, sex), and the date of alleged act(s). A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints.
- 2.) 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 SNHPC Title VI Coordinator. Under these circumstances, the complainant will be interviewed, and the Title VI Coordinator will assist the Complainant in converting the verbal allegations to writing.

- 3.) The SNHPC will notify the NHDOT Title VI Coordinator of any formal Title VI complaint within five business days of receiving the complaint.
- 4.) When a complaint is received, the Title VI Coordinator will provide written acknowledgment to the Complainant, within ten (10) days by registered mail.
- 5.) If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided 60 business days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.
- 6.) Within 15 business days from receipt of a complete complaint, the SNHPC 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.
  - a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
  - b. If the complaint is to be investigated, the notification shall state the grounds of SNHPC's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
- 7.) When SNHPC does not have sufficient jurisdiction, the Executive Director or his/her authorized designee will refer the complaint to the appropriate State or Federal agency holding such jurisdiction.
- 8.) 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 60 days from receipt of the complaint. 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.
- 9.) The Executive Director or his/her authorized designee will issue letters of finding to the Complainant and Respondent within 90 days from receipt of the complaint.
- 10.) If the Complainant is dissatisfied with SNHPC's resolution of the complaint, he/she has the right to file a complaint with the New Hampshire Department of Transportation at the following address:

Title VI Coordinator  
New Hampshire Department of Transportation  
P.O. Box 483, 7 Hazen Drive  
Concord, NH 03302-0483



Phone: (603) 271-3767  
TTY Access: (800) 735-2964

Alternatively, if the Complainant is dissatisfied with SNHPC's resolution of the complaint, he/she has the right to file a complaint with the Federal Transit Administration at the following address:

FTA Office of Civil Rights  
Attention: Title VI Program Coordinator  
East Building, 5th Floor-TCR  
1200 New Jersey Avenue, SE  
Washington, DC 20590

## **Report of Title VI Investigations, Complaints, and Lawsuits**

Since the designation of the Southern New Hampshire Planning Commission MPO in 1973, there have been no Title VI complaints, investigations, or lawsuits filed against the MPO.

## SNHPC MPO Title VI Complaint Form

The purpose of Title VI is to ensure 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 expanded protections to include prohibitions against discrimination on the basis of age, sex, and disability.

The program enables the Southern New Hampshire Planning Commission (SNHPC) 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.**

|  |                   |    |
|--|-------------------|----|
| <b>Section I:</b>  |                   |    |
| Name:  |                   |    |
| Address:   |                   |    |
| Telephone (Home):  | Telephone (Work): |    |
| E-Mail Address:  |                   |    |
| <b>Section II:</b>   |                   |    |
| 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:<br>_____  |                   |    |
| Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.  | Yes               | No |
| <b>Section III:</b>  |                   |    |
| <i>I believe the discrimination I experienced was based on (check all that apply):</i><br>[ ] Race [ ] Color [ ] National Origin [ ] Age [ ] Sex [ ] Disability<br><i>Date of Alleged Discrimination (Month, Day, Year):</i> _____<br><i>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.</i> |                   |    |

|  |     |    |
|--|-----|----|
| <hr/> <hr/> <hr/> <hr/>  |     |    |
| <b>Section IV:</b>   |     |    |
| Have you previously filed a Title VI complaint with this agency?   | Yes | No |
| <b>Section V:</b>  |     |    |
| Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?<br><input type="checkbox"/> Yes <input type="checkbox"/> No<br>If yes, check all that apply:<br><input type="checkbox"/> Federal Agency: _____<br><input type="checkbox"/> Federal Court _____ <input type="checkbox"/> State Agency _____<br><input type="checkbox"/> State Court _____ <input type="checkbox"/> Local Agency _____ |     |    |
| Please provide information about a contact person at the agency/court where the complaint was filed.   |     |    |
| <b>Name:</b>   |     |    |
| <b>Title:</b>  |     |    |
| <b>Agency:</b>   |     |    |
| <b>Address:</b>  |     |    |
| <b>Telephone:</b>  |     |    |
| <b>Section VI:</b>   |     |    |
| 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:

Linda Moore-O'Brien, Title VI Coordinator  
 Southern New Hampshire Planning Commission  
 438 Dubuque Street  
 Manchester, NH 03102

## APPENDIX D - SNHPC MPO & TAC MEMBERSHIP

| Member            | Representation  | Affiliation       |
|-------------------|---|-------------------|
| Dean Williams     | Central NH Regional Planning Commission   | SNHPC MPO and TAC |
| Laurie Makarawicz | MTA (CART)  | SNHPC MPO and TAC |
| Fred Roberge      | Easter Seals of NH  | SNHPC TAC         |
| Leigh Levine      | FHWA NH Division  | SNHPC MPO and TAC |
| Leah Sirmin       | Federal Transit Administration  | SNHPC MPO and TAC |
| Nancy Michels     | Greater Manchester Chamber of Commerce and<br>Greater Derry/Londonderry Chamber of Commerce | SNHPC TAC         |
| Michael Whitten   | Manchester Transit Authority  | SNHPC MPO and TAC |
| Jay Minkarah      | Nashua Regional Planning Commission   | SNHPC MPO and TAC |
| Timothy White     | NHDES   | SNHPC MPO and TAC |
| Linda Dusenberry  | NHDOT   | SNHPC MPO and TAC |
| William Rose      | NHDOT   | SNHPC MPO and TAC |
| Tim Roache        | Rockingham Planning Commission  | SNHPC MPO and TAC |
| Sylvia von Aulock | Southern NH Planning Commission   | SNHPC TAC         |
| Paula Marzloff    | Town of Auburn  | SNHPC MPO         |
| Ron Poltak        | Town of Auburn  | SNHPC MPO         |
| William Herman    | Town of Auburn  | SNHPC MPO and TAC |
| Barbara Salvatore | Town of Bedford   | SNHPC MPO         |
| Bill Jean         | Town of Bedford   | SNHPC MPO         |
| David Danielson   | Town of Bedford   | SNHPC MPO         |
| Charlie Fairman   | Town of Bedford   | SNHPC MPO         |
| William Duschatko | Town of Bedford   | SNHPC MPO         |
| Rebecca Hebert    | Town of Bedford   | SNHPC TAC         |
| Mark Connors      | Town of Bedford   | SNHPC TAC         |
| Albert Hall       | Town of Candia  | SNHPC MPO         |
| Dick Snow         | Town of Candia  | SNHPC MPO and TAC |
| Andrew Hadik      | Town of Chester   | SNHPC MPO and TAC |
| Deb Munson        | Town of Chester   | SNHPC MPO         |
| Bob Cote          | Town of Deerfield   | SNHPC MPO         |
| Fred McGarry      | Town of Deerfield   | SNHPC MPO         |
| Jeff Moulton      | Town of Derry   | SNHPC MPO         |
| John O'Connor     | Town of Derry   | SNHPC MPO         |
| Richard Tripp     | Town of Derry   | SNHPC MPO         |
| George Sioras     | Town of Derry   | SNHPC TAC         |
| Alfred Eisenberg  | Town of Francestown   | SNHPC MPO         |
| Jennifer Vadney   | Town of Francestown   | SNHPC MPO         |
| Linda Kunhardt    | Town of Francestown   | SNHPC MPO         |
| Jamie Pike        | Town of Francestown   | SNHPC TAC         |
| Barbara Griffin   | Town of Goffstown   | SNHPC MPO         |
| David Pierce      | Town of Goffstown   | SNHPC MPO         |
| Jo Ann Duffy      | Town of Goffstown   | SNHPC MPO and TAC |

| Member           | Representation      | Affiliation       |
|------------------|---------------------|-------------------|
| Hank Boyle       | Town of Goffstown   | SNHPC MPO         |
| Cutler Brown     | Town of Hooksett    | SNHPC MPO         |
| Dick Marshall    | Town of Hooksett    | SNHPC MPO         |
| Mark Chagnon     | Town of Hooksett    | SNHPC MPO         |
| Bruce Thomas     | Town of Hooksett    | SNHPC TAC         |
| Deborah Lievens  | Town of Londonderry | SNHPC MPO         |
| Brian Battaglia  | Town of Londonderry | SNHPC MPO         |
| Suzanne Brunelle | Town of Londonderry | SNHPC MPO         |
| Colleen Mailloux | Town of Londonderry | SNHPC TAC         |
| Art Rugg         | Town of Londonderry | SNHPC MPO         |
| Dan O'Neil       | City of Manchester  | SNHPC MPO         |
| Kevin McCue      | City of Manchester  | SNHPC MPO         |
| Peter Capano     | City of Manchester  | SNHPC MPO         |
| Ray Clement      | City of Manchester  | SNHPC MPO         |
| Todd Connors     | City of Manchester  | SNHPC TAC         |
| Jonathan Golden  | City of Manchester  | SNHPC TAC         |
| Mark Suennen     | Town of New Boston  | SNHPC MPO and TAC |
| Thomas Clow      | Town of Weare       | SNHPC MPO and TAC |
| John Hiltz       | Town of Windham     | SNHPC MPO         |
| Peter Griffin    | Town of Windham     | SNHPC MPO         |