



NAUGATUCK VALLEY  
COUNCIL of GOVERNMENTS

# TITLE VI PLAN

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Endorsed by NVCOG Board of Directors **INSERT DATE**

Effective **INSERT EFFECTIVE DATE**

**DRAFT COPY**

Prepared in conjunction with:





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# INTRODUCTION

This Title VI Program Plan (the Plan) has been prepared to assist the Naugatuck Valley Council of Governments (NVCOG), the administrator of Greater Waterbury Transit District and Valley Transit District in ensuring compliance with Section 601 of Title VI of the Civil Rights Act of 1964, which states:

*"No person in the United States shall, on the ground of race, color, 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."*

Under the Civil Rights Act of 1964, and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) and Federal Highway Administration (FHWA) of the U.S. Department of Transportation (USDOT), NVCOG and the Transit Districts have an obligation to ensure that:

- The benefits of its transit services are shared equitably throughout its service area;
- The level and quality of its services are sufficient to provide equal access to all riders in its service area;
- No one is precluded from participating in its service planning process;
- Decisions regarding service changes or facility locations are made without regard to race, color or national origin; and
- A mechanism is in place for the remediation of any discrimination which may occur, even if such discrimination is unintentional

Within its available resources, and with full regard for the delivery of efficient and effective transit service, NVCOG, Greater Waterbury Transit District, and Valley Transit District will continue compliance with the regulations of the FTA, FHWA, and the spirit of the Civil Rights Act of 1964.

This plan supersedes the Valley Council of Governments' Title VI Plan of 2016 and is effective as of **INSERT DATE**, as required. It has been prepared using data from the 2015 and 2017 American Community Survey. Additionally, the Plan recognizes the relationship of NVCOG, Greater Waterbury Transit District, and the Valley Transit District, with regard to Title VI planning, complaints, and procedures, to be synonymous as one entity where the NVCOG provides certain planning and programming for the Valley Transit District who provide transit service and operations.

Furthermore, this plan applies to all instances of NVCOG's use of FTA and FHWA funding for planning and programming in other urbanized areas within its jurisdiction, outside of Valley Transit District's service area.

## Our Title VI Notice

To make the Naugatuck Valley Council of Governments and Valley Transit District's service recipients aware of its commitment to Title VI Compliance—and of their right to file a Title VI Complaint—NVCOG and the Transit District have promulgated the following language on the homepage of their websites ([www.valleytransit.org](http://www.valleytransit.org) & [www.nvcogct.org](http://www.nvcogct.org)), on posters at both facilities, and on all Valley Transit District buses.

### Your Civil Rights

The Naugatuck Valley Council of Governments (NVCOG) and the Valley Transit District (VTD) are committed to providing non-discriminatory service to ensure that no person is excluded from participation in, or denied the benefits of, or subjected to discrimination in the receipt of its services on the basis of race, color or national origin as protected by Title VI of the Civil Rights Act of 1964 ("Title VI").

To request more information about Title VI, or to submit a written complaint if you believe that you have been subjected to discrimination, you may contact:

Naugatuck Valley Council of Governments  
Office of Civil Rights & Title VI Compliance  
49 Leavenworth Street, 3<sup>rd</sup> Floor  
Waterbury, CT 06702

In addition to your right to file a complaint with the NVCOG or VTD, you have the right to file a Title VI complaint with:

U.S. Department of Transportation  
Federal Transit Administration  
Office of Civil Rights  
Kendall Square  
55 Broadway  
Cambridge, MA 02142

Federal Highway Administration  
U.S. Department of Transportation  
Office of Civil Rights  
1200 New Jersey Avenue, SE, Suite E81-105  
Washington, DC 20590



Authority

As a provider of paratransit services within the Lower Valley portion of the Naugatuck Valley planning region, NVCOG and VTD strive to fulfill the requirements and the spirit of relevant regulation.

This plan was prepared under the following regulatory framework:

Title VI of the Civil Rights Act of 1964	42 U.S.C. § 2000d
DOT Implementing Regulations	49 C.F.R. § 21 23 CFR Part 200 1973 Federal-aid Highway Act (23 USC 324) (sex)
DOJ Implementing Regulations	28 C.F.R. § 42.401 <i>et seq.</i> 28 C.F.R. § 50

Open FTA Grants

CT-2016-013	\$1,367,398	Facility Design & Rehab/Reconstruction
CT-2016-16	\$1,000,545	VTD Facility Expansion & Rehabilitation
CT-2016-014	\$293,724	Route 8 Alternatives Study
CT-2018-015	\$300,000	Bus Support EQ/Facilities and Administration

The Naugatuck Valley Council of Governments has four open grants with the FTA and FHWA. In addition, NVCOG and VTD receive annual operating assistance from the Connecticut Department of Transportation.

Open FHWA Grants

CT-36-184	\$2,350,000	Route 34 Reconstruction Project, in Derby (design)
CT-124-165	\$910,700	Route 67 Spot Improvements Project (design)
CT-126-174	\$600,000	Derby-Shelton Bridge Renovation Project (design)
Project No. DEPA00002024307	\$289,285	Watertown-Thomaston NRG Trail Project (design)



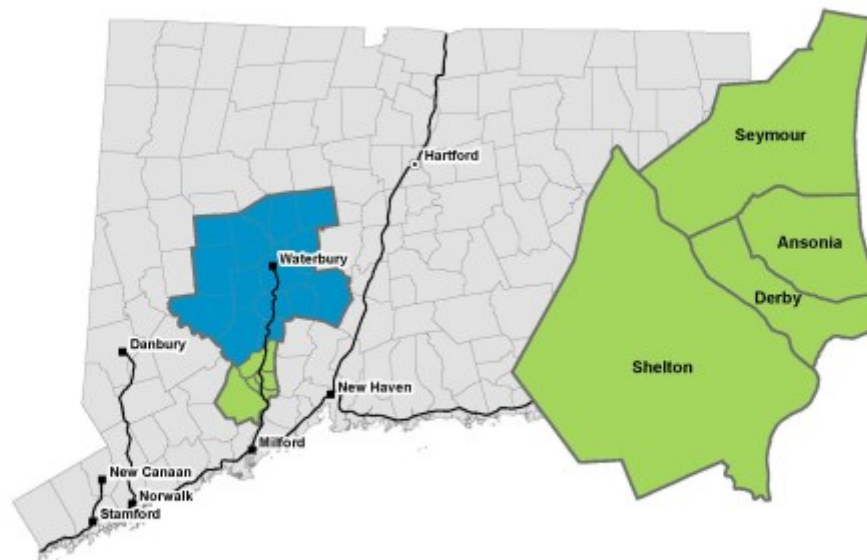


# DEMOGRAPHICS

In order to best serve our users, NVCOG has prepared the following series of maps illustrating the demographics of the Valley Transit District and NVCOG service area. The goal is to better understand potential users and to channel investment towards assisting those who need it most.

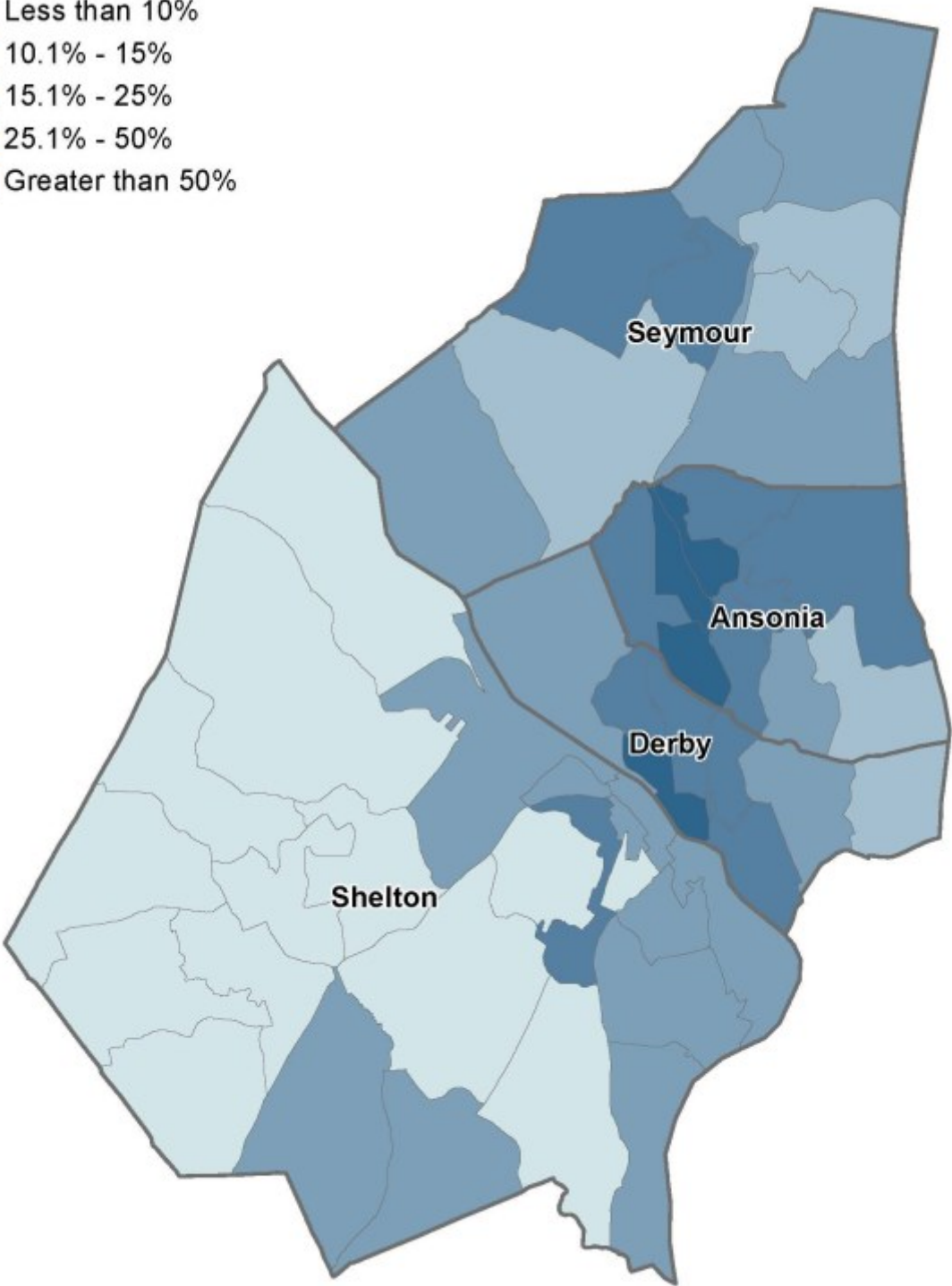
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All following data comes from the American Community Survey 2015 and 2017 5-year estimates. Because these data are estimates from a relatively small sample size, this profile is intended as an indication of facts on the ground, rather than an absolute description of the population. The Council of Governments has made use of existing plans and regional profiles of the service area from other organizations servicing the area to further support our conclusions, and to illustrate any trends surrounding the data.

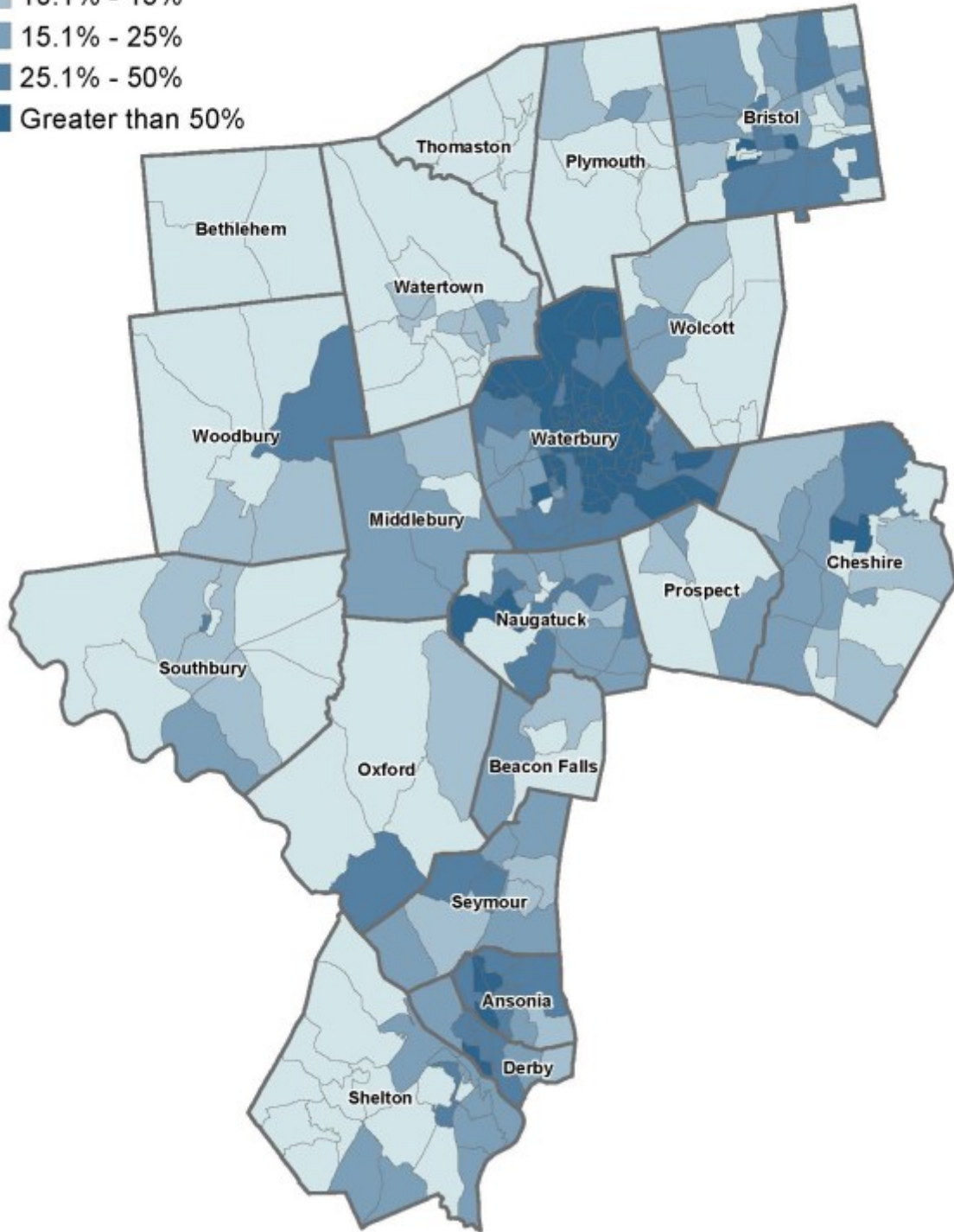
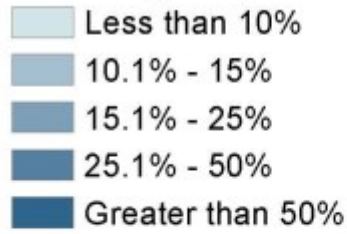


Minority Population by Block Group

- Less than 10%
- 10.1% - 15%
- 15.1% - 25%
- 25.1% - 50%
- Greater than 50%

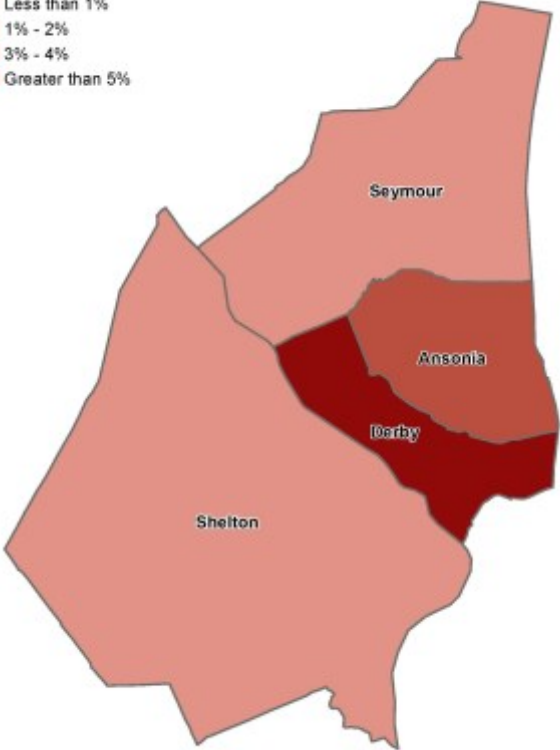


### Minority Population by Block Group



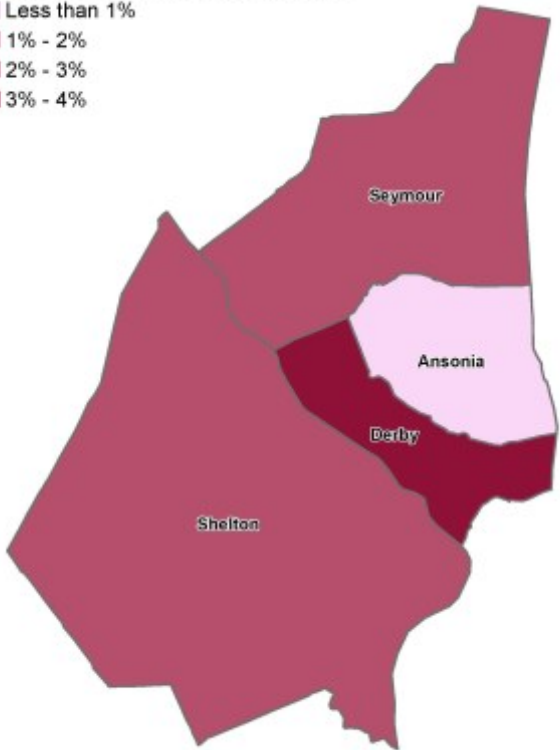
LEP Spanish-Speaking Population by Town

- Less than 1%
- 1% - 2%
- 3% - 4%
- Greater than 5%



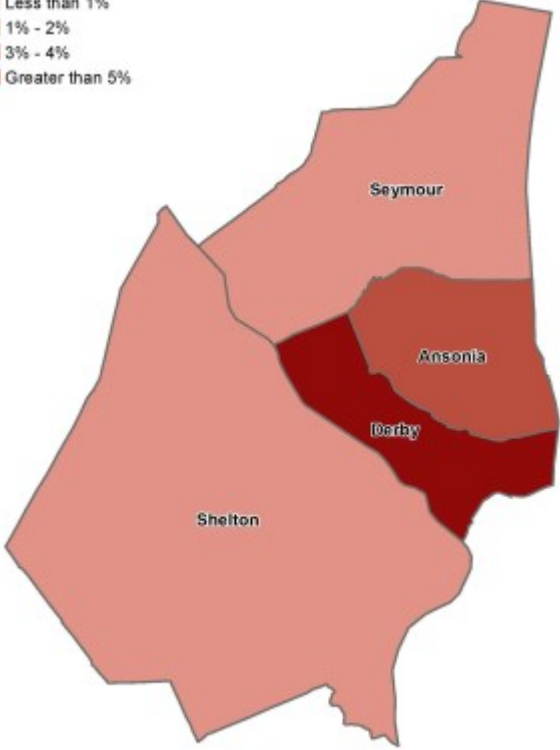
Polish-Speaking Population by Town

- Less than 1%
- 1% - 2%
- 2% - 3%
- 3% - 4%



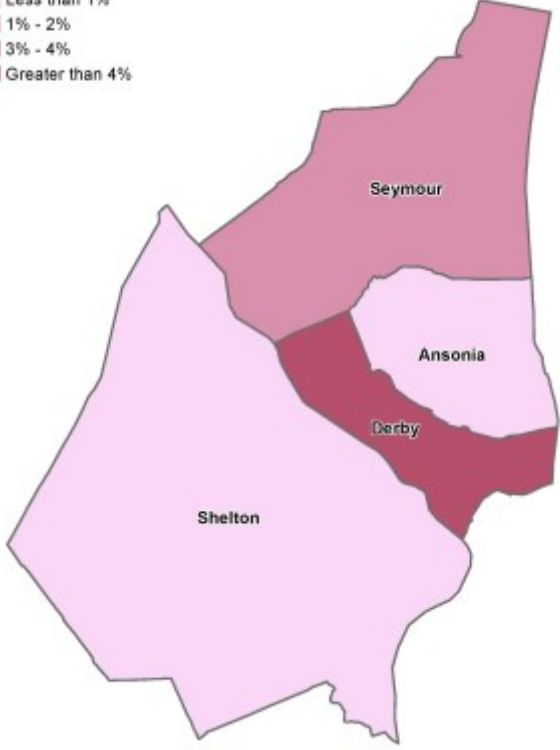
LEP Spanish-Speaking Population by Town

- Less than 1%
- 1% - 2%
- 3% - 4%
- Greater than 5%



LEP Polish-Speaking Population by Town

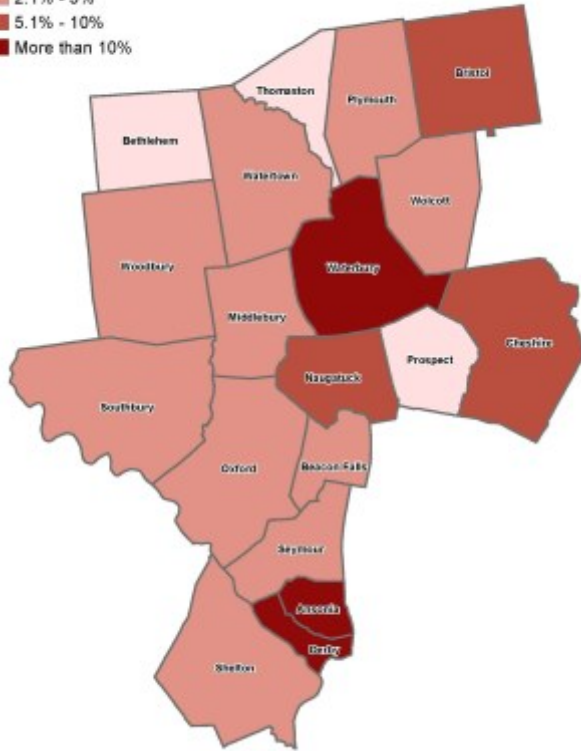
- Less than 1%
- 1% - 2%
- 3% - 4%
- Greater than 4%





**Spanish-Speaking Population by Town**

- Less than 2%
- 2.1% - 5%
- 5.1% - 10%
- More than 10%



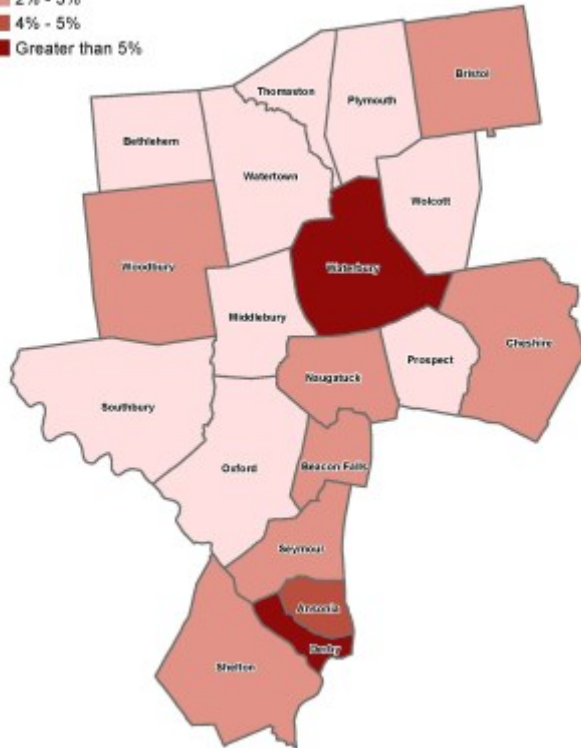
**Polish-Speaking Population by Town**

- Less than 1%
- 1% - 2%
- 2% - 3%
- 3% - 4%



**LEP Spanish-Speaking Population by Town**

- Less than 1%
- 2% - 3%
- 4% - 5%
- Greater than 5%



**LEP Polish-Speaking Population by Town**

- Less than 1%
- 1% - 2%
- 2% - 3%
- Greater than 3%



## DEMOGRAPHICS

NVCOG and VTD were able to determine that there exists a Hispanic population in the NVCOG and VTD service area, the majority of whom speak both English and Spanish (see Table 1 and Table 2). The Spanish-speaking population is concentrated in the urbanized communities of Derby, Ansonia, and Waterbury. It's important to note that VTD's transit services are typically used more frequently by elderly populations, whereas the Spanish-speaking population is relatively young. These facts indicate that there exists a Spanish-speaking population meeting the Safe Harbor threshold within VTD's service area, but this population is less likely than the Spanish-speaking population in the region at large to encounter VTD's transit services.

Additionally, we identified a Polish-speaking population in the VTD service area. The Polish-speaking population includes a growing population of elderly individuals, some of whom do not speak English proficiently. The total population of Polish speakers with limited English proficiency (LEP) is below 1,000 according to the 2015 ACS data (see Table 1), the population of Polish speakers eligible for transit services in the VTD district is a subset of this population. Using the proportion of the population 65 years and older as a proxy, we see that Polish-speakers are unlikely to be eligible for VTD transit services (see Table 2).

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*Table 1: ACS 2015*

	<b>Ansonia</b>	<b>Derby</b>	<b>Seymour</b>	<b>Shelton</b>	<b>Total</b>	<b>Percent</b>
Total Population	18,078	12,004	15,688	39,155	84,925	100.00%
who speak Spanish	2,508	1,796	770	1,879	6,953	8.19%
and speak English "not well" or "not at all"	705	604	178	565	2,052	2.42%
who speak Polish	165	478	465	882	1,990	2.34%
and speak English "not well" or "not at all"	84	355	265	256	960	1.13%

*Table 2: ACS 2017*

	<b>Ansonia</b>	<b>Derby</b>	<b>Seymour</b>	<b>Shelton</b>	<b>Total</b>	<b>Percent</b>
Population 65 and Over	2,803	1,924	2,236	8,417	15,380	100.00%
who speak Spanish	233	89	78	112	512	3.33%
and speak English "not well" or "not at all"	170	13	0	29	212	1.38%
who speak another Indo-European language*	119	150	136	868	1,273	8.28%
and speak English "not well" or "not at all"	36	26	13	245	320	2.08%

\*Note: Indo-European languages include Polish, Portuguese, and Italian: languages of which there is a population of speakers >200 in the region.

Table 3: ACS 2015

	Total Population	who speak Spanish	and speak Eng- lish "not well" or "not at all"	who speak Polish	and speak Eng- lish "not well" or "not at all"
<b>Ansonia</b>	18,078	2,508	705	165	84
<b>Beacon Falls</b>	5,965	126	65	137	120
<b>Bethlehem</b>	3,429	15	0	16	8
<b>Bristol</b>	57,732	4,289	1,297	1,091	414
<b>Cheshire</b>	28,122	1,633	658	198	36
<b>Derby</b>	12,004	1,796	604	478	355
<b>Middlebury</b>	7,323	162	26	64	4
<b>Naugatuck</b>	29,560	2,051	610	194	64
<b>Oxford</b>	12,229	385	58	49	15
<b>Plymouth</b>	11,408	279	98	112	47
<b>Prospect</b>	9,291	112	53	27	9
<b>Seymour</b>	15,688	770	178	465	265
<b>Shelton</b>	39,155	1,879	565	882	256
<b>Southbury</b>	18,753	482	143	62	45
<b>Thomaston</b>	7,465	86	0	11	0
<b>Waterbury</b>	101,664	26,534	9,948	342	137
<b>Watertown</b>	21,033	653	53	93	16
<b>Wolcott</b>	16,177	392	73	111	33
<b>Woodbury</b>	9,144	291	153	0	0
<b>Region</b>	424,220	44,443	15,287	4,497	1,908
<b>Percent</b>		10.48%	3.60%	1.06%	0.45%



Table 4: ACS 2017

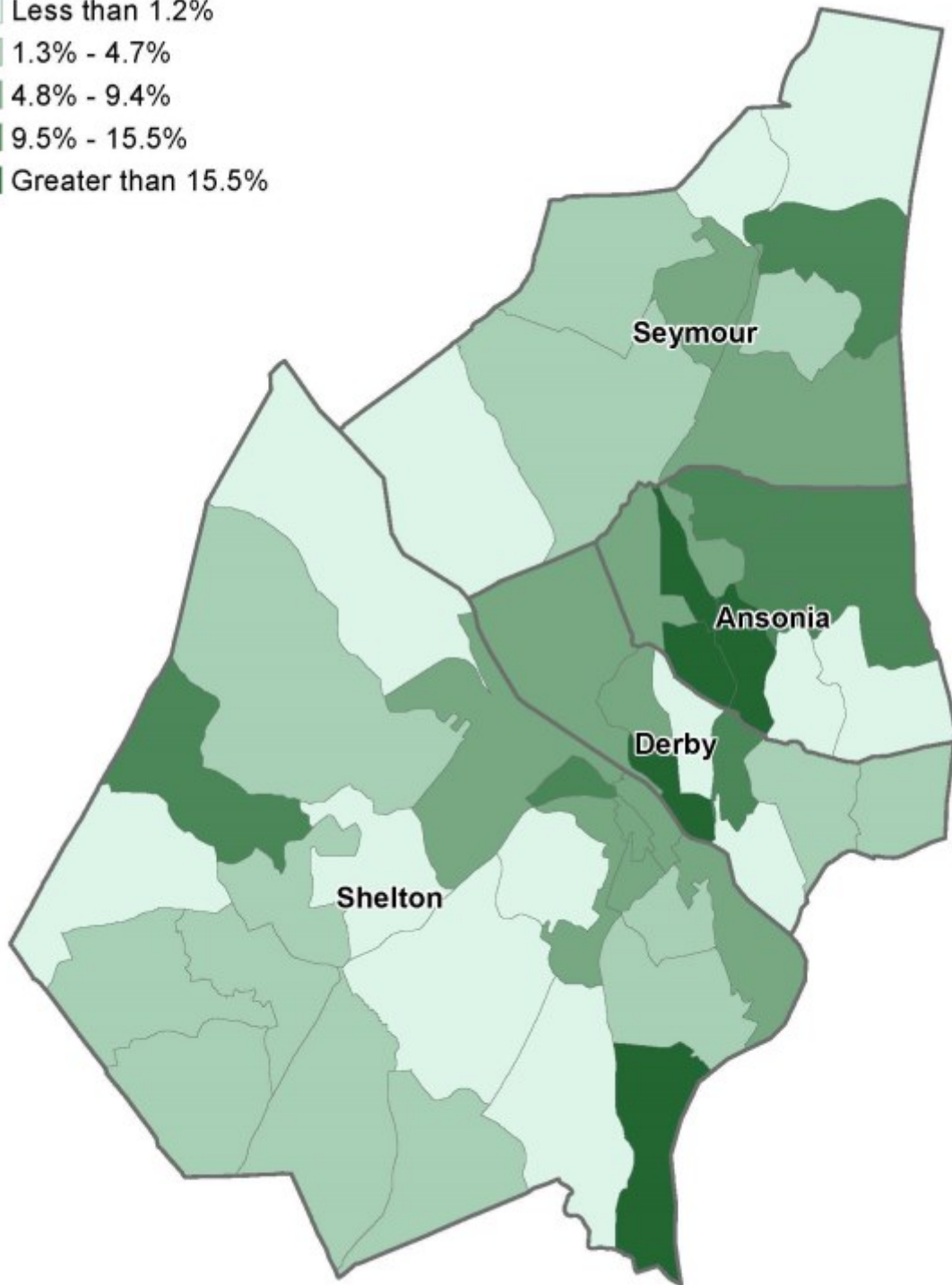
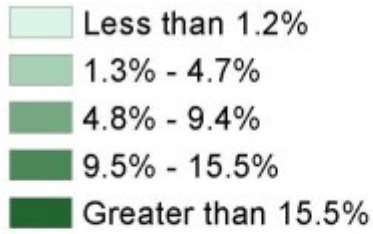
	Total Population	Estimated population 65 years and over	who speak Spanish	and speak English “not well” or “not at all”	who speak another Indo -European language*	and speak English “not well” or “not at all”
<b>Ansonia</b>	18,116	2,803	233	170	119	36
<b>Beacon Falls</b>	5,866	902	28	28	0	0
<b>Bethlehem</b>	3,379	578	0	0	26	0
<b>Bristol</b>	57,567	9,590	484	277	1,234	125
<b>Cheshire</b>	28,203	5,075	64	0	447	48
<b>Derby</b>	11,959	1,924	89	13	150	26
<b>Middlebury</b>	7,383	1,553	4	0	176	28
<b>Naugatuck</b>	29,230	4,717	237	95	818	256
<b>Oxford</b>	12,412	2,150	16	16	104	0
<b>Plymouth</b>	11,264	1,917	8	0	106	0
<b>Prospect</b>	9,380	1,864	16	0	110	16
<b>Seymour</b>	15,889	2,236	78	0	136	13
<b>Shelton</b>	39,728	8,471	112	29	868	245
<b>Southbury</b>	18,682	5,542	29	3	226	54
<b>Thomaston</b>	7,360	1,266	0	0	25	0
<b>Waterbury</b>	101,631	14,077	2,031	964	1,607	645
<b>Watertown</b>	20,999	3,893	0	0	588	85
<b>Wolcott</b>	15,974	2,759	58	58	197	60
<b>Woodbury</b>	9,114	1,957	53	0	111	20
<b>Region</b>	424,136	73,220	3,540	1,653	7,048	1,657
<b>Percent</b>		17.26%	4.83%	2.26%	9.63%	2.26%

\*Note: Indo-European languages include Polish, Portuguese, and Italian: languages of which there is a population of speakers >200 in the region.



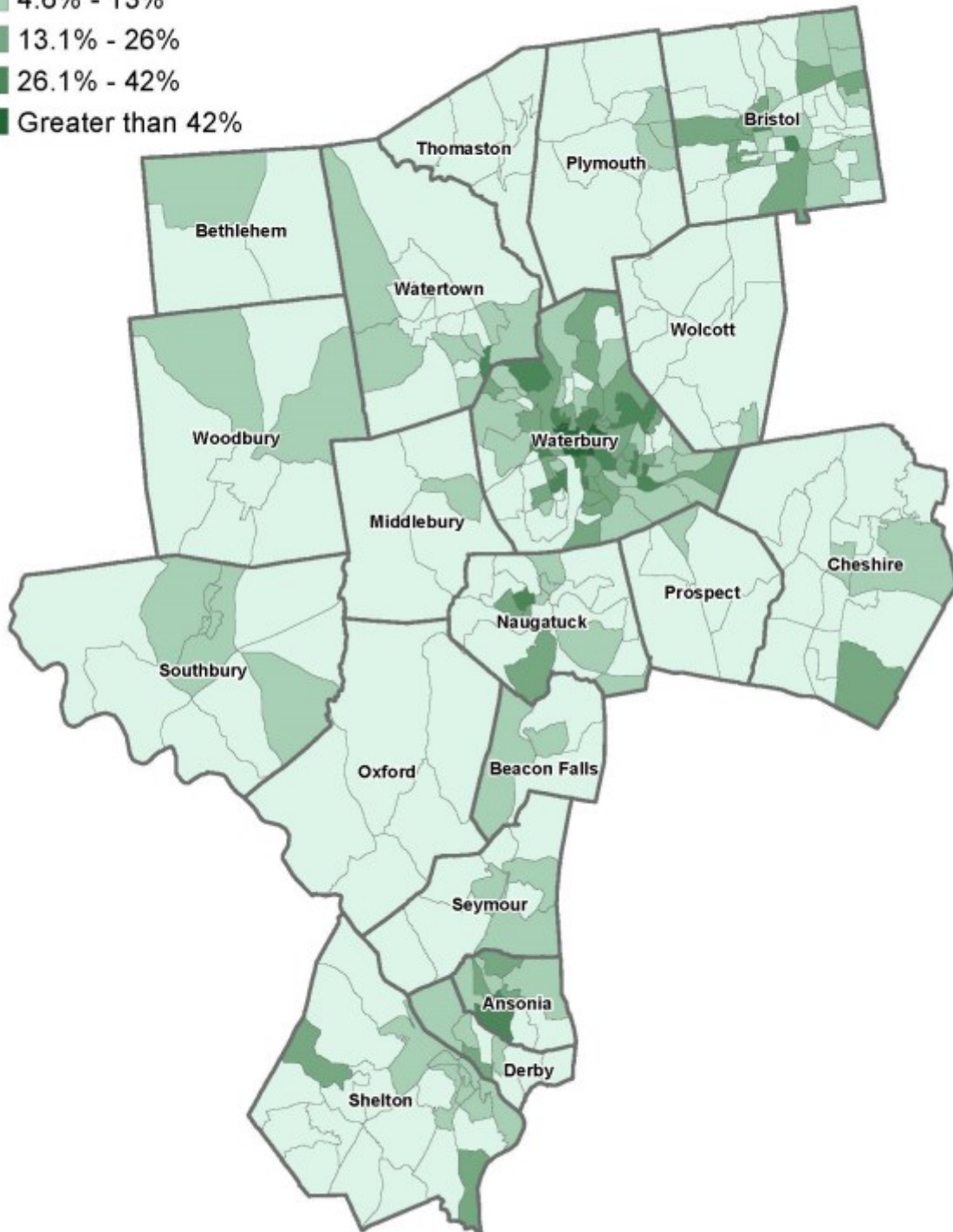


### Households with No Vehicle Owned by Block Group



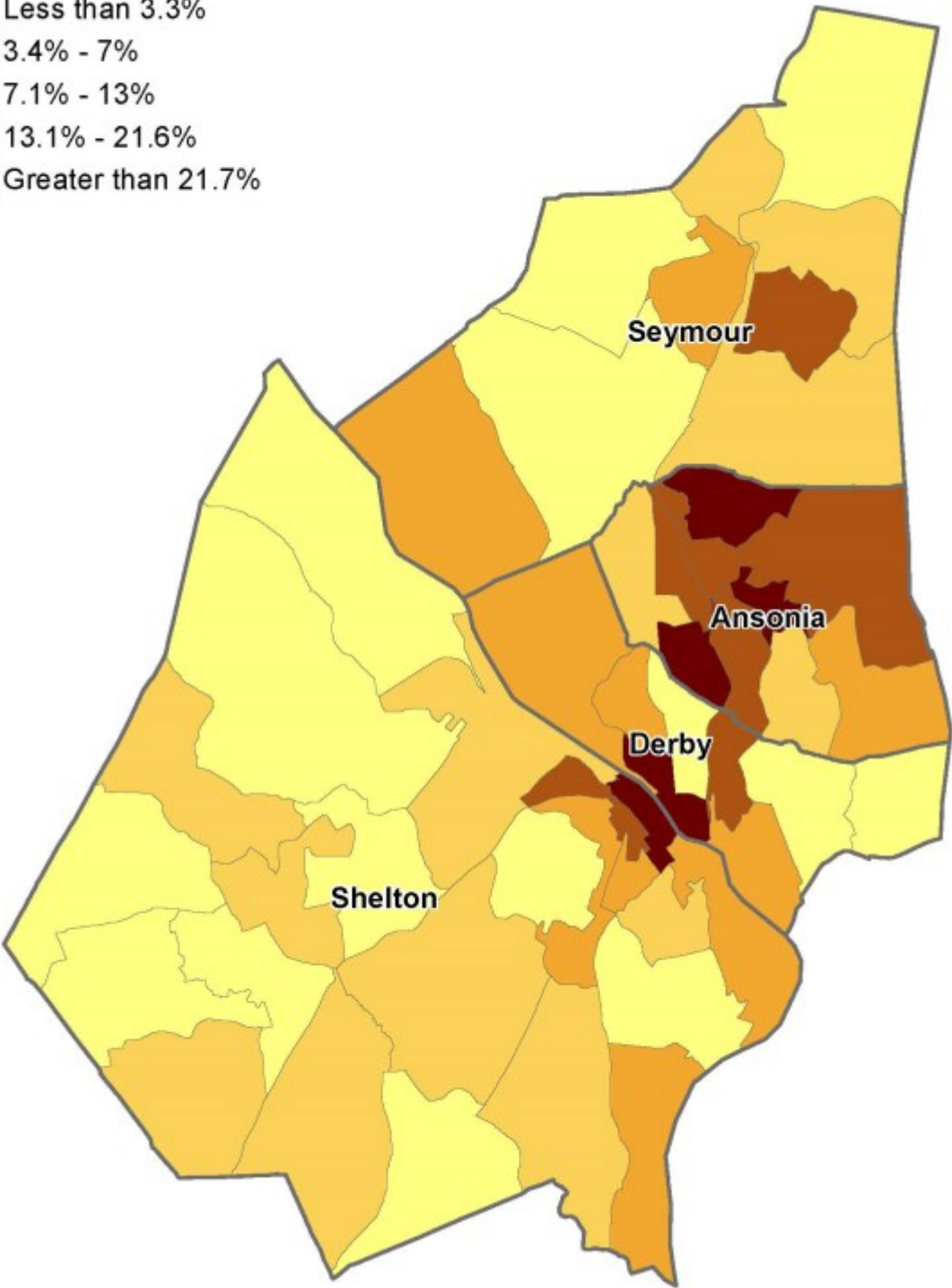
### Household with No Vehicle Owned by Block Group

- Less than 4.5%
- 4.6% - 13%
- 13.1% - 26%
- 26.1% - 42%
- Greater than 42%



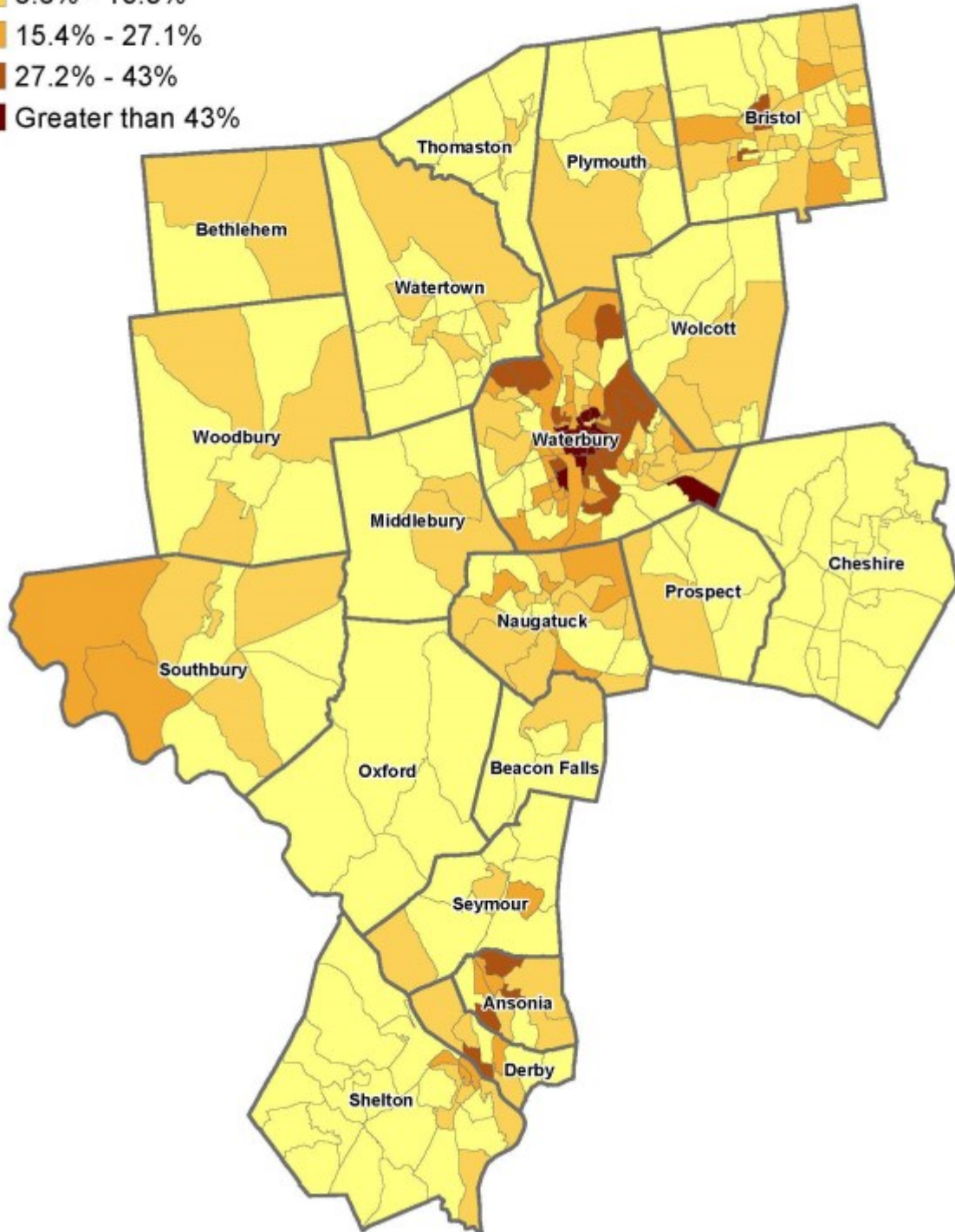
Household Poverty by Block Group

- Less than 3.3%
- 3.4% - 7%
- 7.1% - 13%
- 13.1% - 21.6%
- Greater than 21.7%









### Household Poverty by Block Group

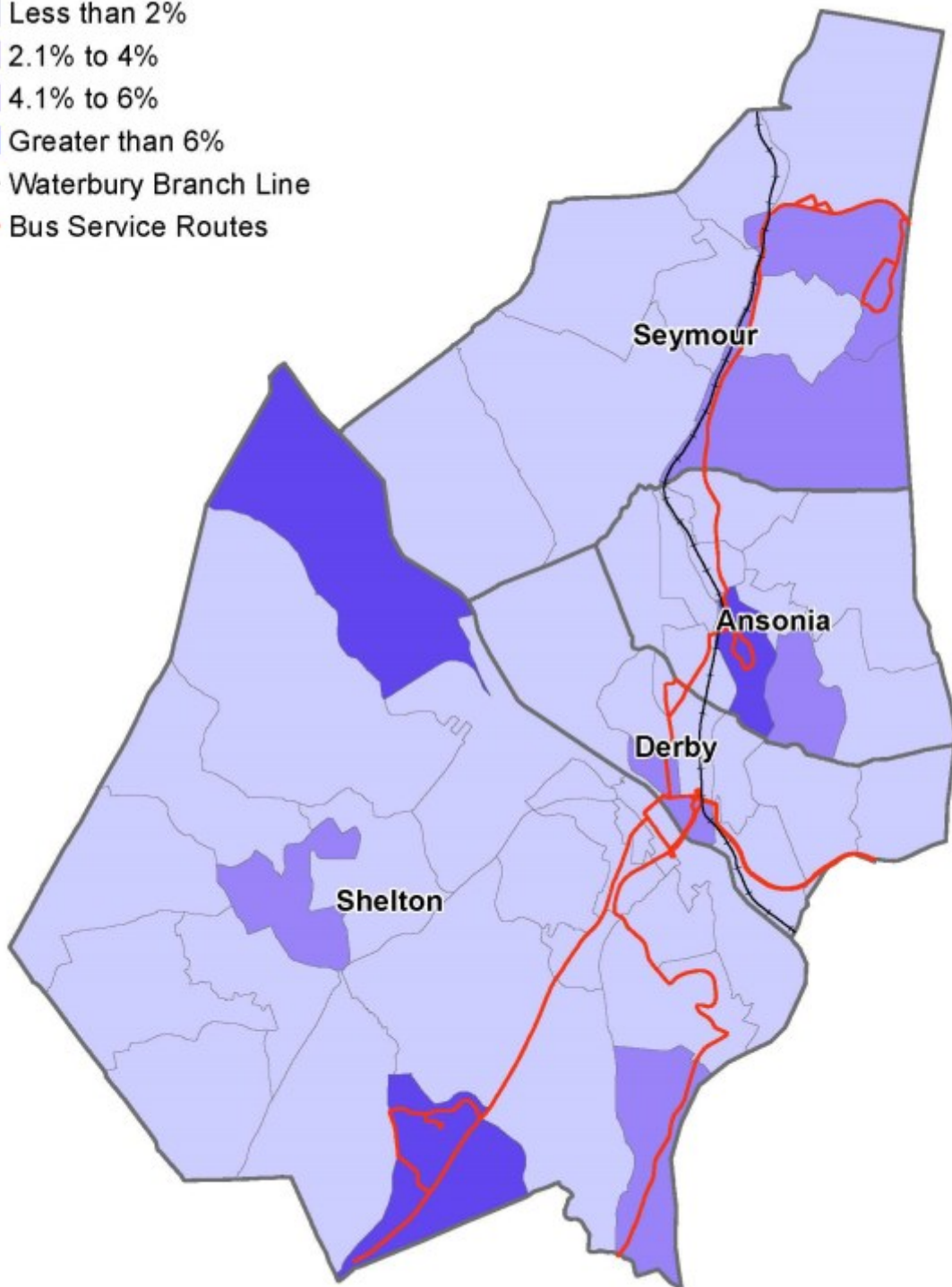
- Less than 6.5%
- 6.6% - 15.3%
- 15.4% - 27.1%
- 27.2% - 43%
- Greater than 43%





### Transit Commuters by Block Group

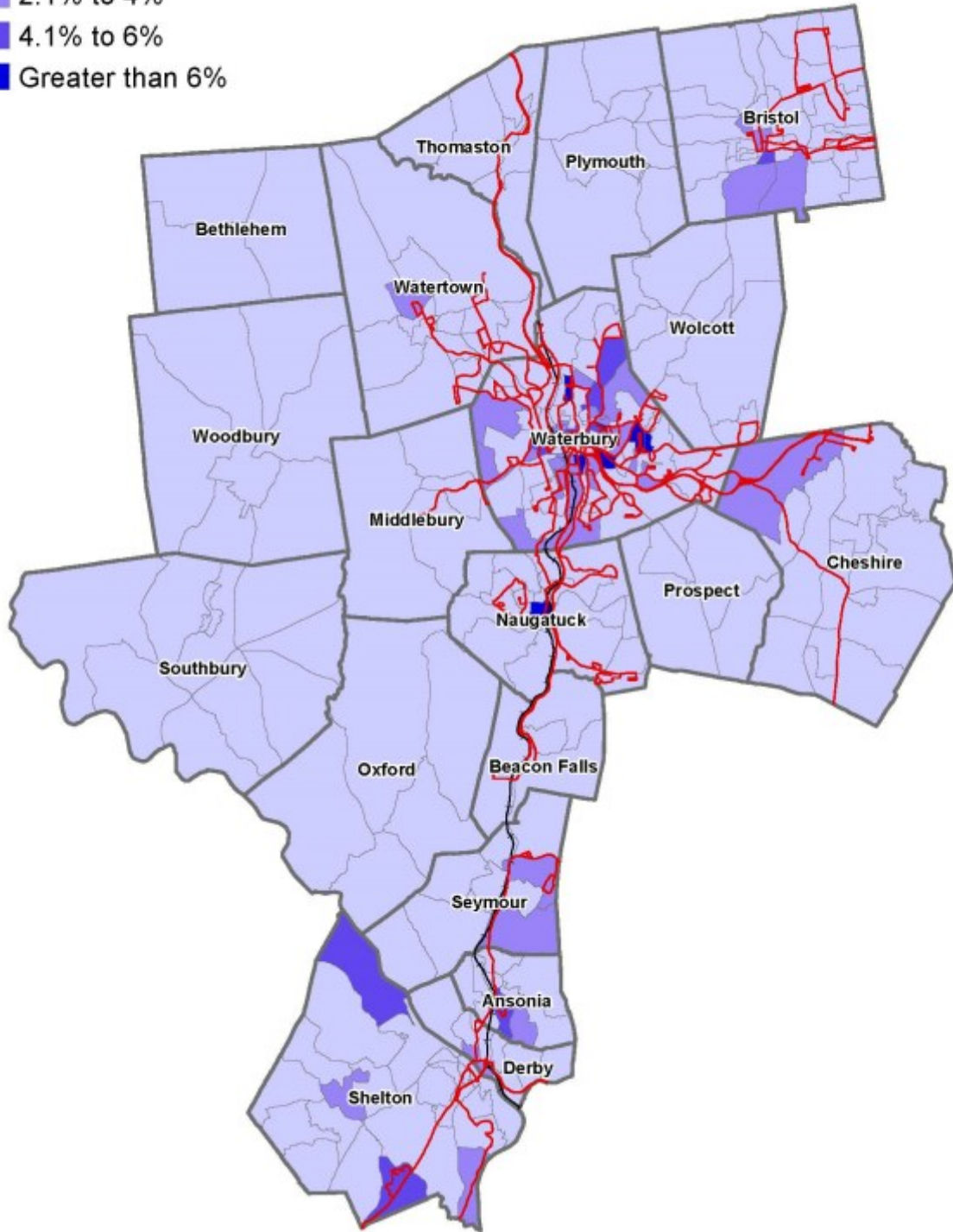
-  Less than 2%
-  2.1% to 4%
-  4.1% to 6%
-  Greater than 6%
-  Waterbury Branch Line
-  Bus Service Routes



### Transit Commuters by Block Group



— Waterbury Branch Line  
— Bus Service Routes



### Analysis

The NVCOG (which encompasses Greater Waterbury Transit District) and VTD region are relatively diverse areas. The minority population is concentrated in the more urbanized jurisdictions such as Waterbury, Ansonia, and Derby. According to the 2017 American Community Survey, Non-White residents comprise 61.5% of the population in Waterbury, 37% of the population in Ansonia, and 33.3% of the population in Derby. By analyzing the minority population and major languages spoken in the region, it is evident that the population centered around Waterbury, Ansonia, and Derby contains a large proportion of Spanish-speaking individuals. On the other hand, the region's Polish-speaking population is mostly situated in Beacon Falls, Seymour, Derby, and Shelton. Many areas with large minority populations also live in households without a vehicle. As a result, the proportion of residents relying on public transportation to get to work is generally higher.

Identifying public transportation needs, particularly paratransit needs, is somewhat difficult in this region due to the existence of the Metro-North Railroad's New Haven Line, several branches of which run within close driving distance of the region. This creates outlier block groups such as the one in southeast Shelton and central Naugatuck, where a relatively large share of the population uses public transportation to commute but few are minorities, few are in poverty, most households own a vehicle, and no fixed-route service is available. Even with this clarification, it is clear that there exists a transit-dependent population that likely contains a high proportion of Spanish speakers and a large proportion of households in poverty. It's important to note that Waterbury contains a very high public transportation need due to the high percentage of residents utilizing public transit to get to work and the significant proportion of households without a car.



# PUBLIC PARTICIPATION PLAN

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The Naugatuck Valley Council of Governments and the Valley Transit District are required to submit a Title VI program every three years per FTA Circular 4702.1B. The Council of Governments and Transit District understand the importance of involving the public, especially members of underserved populations, in the development and planning of its Title VI program. The Council of Governments and the Transit District will utilize the following procedures to engage the public in its Title VI program.

This public participation plan applies to future updates of the Title VI plan, as well as to all fare changes and major service policies in the Valley Transit District.

- Title VI program updates will be published in at least two (2) publications having substantial circulation in the transit service area at least one week apart. Notices will also be posted on the NVCOG and the VTD websites, along with the four municipal town halls that are located within the Transit District's service area.
- The Council of Governments and the Transit District will seek help from community leaders and organizations to facilitate involvement of traditionally underserved populations. Community leaders and organizations that represent these groups should be consulted about how to most effectively reach their member for public involvement in the Title VI program.
- Public meetings should be held in locations that are accessible by public transit. If a targeted population is located in a certain geographic area, then the meeting location should be in that area for their convenience.
- There will be a minimum of a thirty (30) day public comment period beginning with the first public notice.
- A public session item will be placed on the NVCOG board agenda for two consecutive months following the first published notice.
- Any resulting change or action due to public comment or discussion will be documented in the NVCOG board meeting minutes and posted within seven (7) business days at the four (4) cities/town (halls/offices) comprising the VTD's service area.





- The Title VI program will take effect immediately following the decision of the NVCOG board meeting at which a vote on the Title VI program will be taken.
- All public meetings related to the Title VI program will be held at an ADA accessible facility.

### Summary of outreach since 2016

NVCOG is working on the ALT Mode Study for the Route 8 corridor. This project involves examining ways to promote transit-oriented development along eight nodes. NVCOG has released a survey and embarked on a robust stakeholder process to engage communities through a series of workshops. In addition, NVCOG recently updated its Metropolitan Transportation Plan (MTP), this document outlines how the region hopes to utilize future federal and state transportation dollars. NVCOG also created a survey to collect public input from residents.

## Language Assistance Plan

NVCOG and Transit District recognizes that there is a population within its service area who are not fluent in English. In order to better serve this population, NVCOG has completed the following Four Factor Analysis (process detailed in the Title VI circular) and subsequent Language Assistance Plan to discern what languages this population does speak and how NVCOG and the Transit District can best serve them. The results of this plan have been incorporated into the above Public Participation Plan.

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### Four Factor Analysis

Under guidance from the U.S. Department of Transportation, the Council of Governments and Transit District are obligated to determine the extent of its obligation to provide LEP services to its transit population. This determination must be based on an analysis of four factors:

<b>Factor #1</b>	The number or proportion of Limited English Proficiency persons who may be serviced or are likely to encounter a program, activity or service
<b>Factor #2</b>	The frequency with which Limited English Proficiency persons come in contact with programs, activities or services
<b>Factor #3</b>	The nature and importance of programs, activities or services to the LEP population
<b>Factor #4</b>	The resources available to the recipient and overall costs to provide LEP assistance



An analysis of these four factors are on the following pages, as well as information about how NVCOG and VTD address these factors individually and holistically.

### Factor 1

#### Number & Proportion of LEP Persons Likely to Be Served

NVCOG and the Transit District have worked with 2015 and 2017 American Community Survey data—and with local social service organizations—to ascertain which LEP populations exist in the Valley Transit District.

NVCOG and the Transit District were able to determine that there exists a sizable transit-dependent Hispanic population, concentrated in the more urbanized cities of Waterbury, Derby, and Ansonia. This population is clearly an integral portion of several towns in the NVCOG region.

Additionally, there exists a small Polish-speaking population in Derby and Ansonia. Through discussion with local service agencies and churches, it is apparent that this population is not as transit-dependent and predominantly speaks English in addition to Polish. This population does not meet the Safe Harbor threshold.

See the Demographic Profile for a more complete analysis of the number and proportion of LEP populations in the Transit District.

### Factor 2

#### Frequency of contact

LEP populations in the District encounter the transit programs provided by VTD only rarely, as few LEP individuals in the region are dependent upon paratransit services. From conversations with other social service providers, NVCOG and VTD do expect the frequency of contact with LEP populations to increase, primarily in amongst native Spanish speakers.

The primary contact between our service population, including LEP individuals, and VTD occurs at two points: the schedule of the ride and the ride itself. VTD maintains a Spanish-speaking staff member during business hours to assist Spanish-speaking LEP individuals with ride scheduling. Additionally, several partner organizations have committed to providing over-the-phone translation services when necessary (see *the Language Assistance Plan below*). Family members have also been known to call VTD in order to schedule rides on behalf of LEP transit riders.

During the ride itself, the primary contact is upon pickup. Many LEP individuals in the Transit District live with a younger proficient English speaker who often assists in the process. VTD also allows for companion riders who can serve an interpretive role.

### Factor 3

#### Nature / Importance of Program

# LEP

Limited English Proficiency

#### Safe Harbor?

If the eligible LEP population in a given language exceeds 5% or 1000 members of the eligible population for VTD's services, vital written materials will be translated to accommodate their needs.



The paratransit services provided by VTD are of great importance to the population dependent upon them, though that population is small. VTD provides ADA transit services to populations unable to access existing fixed route service in the District provided by other transit providers. VTD also provides non-emergency medical transportation for its riders. While very few LEP individuals are dependent upon VTD’s services, VTD’s services are vital to those who are dependent.

## Factor 4

### Resources Analysis

While the LEP population in the Transit District is small, the Valley region is strong in its support of these individuals. VTD has few vital documents to translate, and maintaining staff members who speak Spanish and connections with other local outreach organizations and non-profits eases translation costs. Organizations partnered with NVCOG and VTD to serve the LEP population are listed in Table 5 to the right.

### Language Assistance Activities

From the above analysis, the Council of Governments and Transit District have concluded that providing Spanish-language assistance is important to best serve our target population. Furthermore, the Spanish-speaking population meets the Department of Justice’s Safe Harbor provision, requiring translation of vital documents. NVCOG and VTD make extensive efforts to transmit information to the public in Spanish in addition to English, including making the following materials available in Spanish to the service area:

- [Valley Transit District Website](#)
- [Naugatuck Valley Council of Governments Website](#)
- [Title VI Notice of Rights](#)
- [Title VI Complaint Form](#)
- [Public Participation Notices](#)
- [Interior Bus Notifications](#)
- [Surveys](#)

The Council of Governments and Transit District also retains one customer service representative who is fluent in Spanish and is available on all business days.

In addition to these services, occasionally a Spanish-speaking LEP individual calls to schedule a ride when our representative is unavailable. In these cases VTD customer service representatives are able to take down their information and make contact with one of our partners to provide interpretive services. Once interpretive assistance is secured, the rider is contacted and the ride is scheduled. This

#### Partner Organizations for LEP Assistance

Ansonia Housing Authority
Area Congregations Together
Birmingham Group Health Services
Coordinated Transportation Solutions
Derby Housing Authority
Naugatuck Valley Health District
Seymour Housing Authority
Shelton Housing Authority
St. Joseph Church
St. Michael the Archangel Parish
TEAM, Inc.
The WorkPlace, Inc.
Valley Arts Council
Valley United Way

Table 5: Partner Organizations



does not delay the ride, even if the time between the call and the translation eclipses VTD's default deadline for ride scheduling.

Additionally, a small Polish-speaking population lives in the region. Through the above analysis, NVCOG and VTD have concluded that this population does not require the same level of language services that the Spanish-speaking population requires, primarily due to the availability of adult family members who speak English fluently. The Council of Governments and the Transit District have added a Polish translation of our Title VI notification to all of our vehicles, and posted in both offices, as our resource analysis allowed for it. NVCOG and VTD have also provided Polish versions of our respective websites. The needs of the Polish-speaking population will continue to be monitored.

Culturally-Polish institutions, particularly Catholic churches in the district, have been contacted through this process and revealed that many Polish-speaking clients know English. These institutions have been added to internal lists of organizations to contact to disseminate public notices.

### Makeup of Boards

The primary mechanism for decision-making for VTD is the Board of Commissioners. This is the overall governing and policy-setting body and consists of 10 members representing the four municipalities which comprise the service area. The Board meets monthly at regularly scheduled public meetings which are publicly noticed. Members are appointed to one-year terms by the Chief Elected Officials of the municipalities of Ansonia, Derby, Seymour, and Shelton. The number appointed for each municipality is set by a formula based on the populations of the represented municipalities, as set forth in Chapter 103A of the Connecticut General Statutes, and is presently as follows:

Appointed from Ansonia	1
Appointed from Derby	2
Appointed from Seymour	2
Appointed from Shelton	3

Of the total membership, 8 are Caucasian (4 males and 4 females) of which 1 is a disabled female.

## PUBLIC PARTICIPATION

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The Greater Waterbury Transit District (GWTD) Board meets at least four times per year and consists of 14 members across nine municipalities. Board members are appointed by their municipality. The District may assume any or all of the powers granted to transit districts under CGS § 7-273d. GWTD oversees Non-ADA paratransit and Dial-A-Ride services throughout the region. The composition of the Board presently follows:

Appointed from Cheshire	2
Appointed from Middlebury	1
Appointed from Naugatuck	2
Appointed from Prospect	1
Appointed from Southbury	1
Appointed from Thomaston	1
Appointed from Waterbury	4
Appointed from Watertown	1
Appointed from Wolcott	1

Of the total membership: 11 are Caucasian, 2 are African American, and 1 is Hispanic. All 14 Board members are female.

## PUBLIC PARTICIPATION

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The Naugatuck Valley Council of Governments (NVCOG) consists of a 19-member Board. Each of the 19 municipalities in the NVCOG region is allocated one voting member. The Board meets monthly at regularly scheduled public meetings which are publicly noticed. The members of the Board are listed below:

**Ansonia:** David Cassetti, Mayor

**Beacon Falls:** Christopher Bielik, First Selectman

**Bethlehem:** Leonard Assard, First Selectman

**Bristol:** Ellen Zoppo-Sassu, Mayor

**Cheshire:** Rob Oris, Jr., Town Council Chairman

**Derby:** Richard Dziekan, Mayor

**Middlebury:** Edward St. John, First Selectman

**Naugatuck:** N. Warren "Pete" Hess, Mayor

**Oxford:** George Temple, First Selectman

**Plymouth:** David Merchant, Mayor

**Prospect:** Robert Chatfield, Mayor

**Seymour:** W. Kurt Miller, First Selectman

**Shelton:** Mark Lauretti, Mayor

**Southbury:** Jeffrey Manville, First Selectman

**Thomaston:** Edmond Mone, First Selectman

**Waterbury:** Neil O'Leary, Mayor

**Watertown:** Thomas Winn, Town Council Chairman

**Wolcott:** Thomas Dunn, Mayor

**Woodbury:** Barbara Perkinson, First Selectman

Of the total membership, 19 are Caucasian (17 males and 2 females).



# ERRATA

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In addition to the above procedures and processes, full Title VI compliance requires the following explicit information:

## Subrecipient Monitoring

The Naugatuck Valley Council of Governments is a direct recipient of FTA funds and has no subrecipients.

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## Facility Construction

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."

NVCOG and VTD acknowledge their 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 will 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. When evaluating locations of facilities, NVCOG will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis will be done to ensure that proper perspective is given to localized impacts. If NVCOG determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, it may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin.





### VTD Maintenance & Operations Facility

The Naugatuck Valley Council of Governments is overseeing the construction and renovation of the Valley Transit District maintenance and operations facility through funding from FTA grant CT-2016-16. A needs and deficiency study was conducted and a preferred alternative was selected by the Valley Transit District board of directors. The preferred alternative involves an entire overhaul of HVAC, plumbing, electrical, and mechanical systems, as well as an addition to the maintenance bay, bus storage bay, and dispatch center. The existing building will remain and will be added onto. No additional land will be built upon; the renovations will be completely within the existing property footprint with no additional property required. This project qualified for a Categorical Exclusion.

This Categorical Exclusion is based on the renovation of an existing facility that will not expand beyond the existing site, and will not require the acquisition of additional land. More specifically, the renovations include the replacement and upgrade of the facilities mechanical systems which are located within the building. Additionally, there will two additions to the building which also do not extend beyond the existing site. A full environmental report was prepared.

# APPENDICES

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The following documents are appended:

- Title VI Discrimination Complaint Form
- Title VI Discrimination Complaint Process
- NVCOG Board Endorsement

