

Title VI and Environmental Justice Assessment for a New FRTA Maintenance Facility



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Table of Contents

Introduction	3
Background	4
Community Profile	5
Land Use and Transportation Overview	5
Population Overview	6
Population and Demographics.....	6
Housing	7
Employment and Income.....	8
Commuting	8
Potential Maintenance Facility Sites.....	9
Site 1: 15 Jewett Avenue, Deerfield.....	11
Site 2: 215 Shelburne Road, Greenfield	11
Site 3: 1385 Bernardston Road, Greenfield	11
Site 4: 180 Laurel Street, Greenfield.....	11
Site 5: Sandy Lane, Montague	11
Title VI Equity Analysis.....	12
Title VI Equity Demographics.....	13
Minority Populations for each Site	13
Low-Income Populations for each Site	13
Definition of Disparate Impact and Disproportionate Burden	14
Title VI Assessment Results.....	15
Site Alternatives Equity Assessment.....	16
Preferred Site Cumulative Analysis.....	16
Environmental Justice and Community Impacts	17
Displacements.....	19
Access and Travel Patterns	19
Affected Neighborhoods and Businesses	20
Environmental Justice.....	20
Limited English Proficiency	21
Public Participation	21

Conclusions21

Introduction

The Franklin Regional Transit Authority (FRTA) is the regional transit authority for the greater Franklin County area. It serves a total of 41 towns with demand response transportation and 10 towns with fixed route service and paratransit. The FRTA also provides microtransit services to most Franklin County towns as well. The FRTA transit hub is located at the John W. Olver (JWO) Transit Center in downtown Greenfield (12 Olive Street). Almost all fixed route buses originate at the JWO Transit Center, and almost all transfers between routes also occur at this location. The FRTA has the largest service area in Massachusetts, covering 1,121 miles – almost all of which is considered rural.

Currently, the FRTA's maintenance facility is located at 382 Deerfield Street in Greenfield. The maintenance facility is leased by the FRTA from a private party. The lease was set to expire in 2017, but has been renewed on a yearly basis since then. The FRTA have begun efforts to acquire a new maintenance facility that better fits its current and future needs. In 2012, the FRTA hired Weston & Sampson to conduct an Operations Facility Needs Assessment, which showed that the current maintenance facility, given its age and condition, would need significant renovations. These renovations are cost prohibitive, and it was further determined that remaining at the current site was not in the best interest of the FRTA or the communities it serves.

In 2015, FRTA employed STV Incorporated to conduct a Site Selection Analysis for a new maintenance facility. Four potential sites were assessed for a new FRTA Vehicle and Maintenance and Operations Facility. These sites were:

- 215 Shelburne Road, Greenfield, MA
- 1835 Bernardston Road, Greenfield, MA
- 15 Jewett Avenue, Deerfield, MA
- 180 Laurel Street, Greenfield, MA

At the time of the 2015 report, the 180 Laurel Street site in Greenfield was recommended as the preferred site due to its proximity to the JWO Transit Center and major routes; compatible land use with existing zoning; and ample size. However, as more detailed site analysis occurred, it was determined that the parcel had too many environmental hurdles to overcome and was no longer a preferred site. After another review of available properties in the region, the FRTA then selected a parcel on Sandy Lane in the Town of Montague as another potential site for a total of five alternative sites. The Sandy Lane parcel is currently the preferred site due to its location, size, and distance from the JWO Transit Center.

As a recipient of federal funds, the FRTA is required to comply with the Federal Transit Administration's Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*. This circular outlines the Title VI issues and requirements that the FRTA must follow. This includes an obligation to assess the Title VI impacts and benefits of relocating the existing maintenance facility to the potential five sites identified above. Generally, Title VI states that "no person in the United States shall, on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or subjecting them to discrimination under any program or activity receiving Federal financial assistance." The circular also states that "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.”

In addition to Title VI requirements, the FRTA is also required to comply with the 1994 Presidential Executive Order, which directs every federal department and agency and funding recipients to make environmental justice part of its mission and to identify and address disproportionately high and adverse effects of its programs, policies, and activities on minority populations and low-income populations (often referred to as EJ populations).

This assessment will examine the five potential maintenance facility sites identified above to determine if the preferred Sandy Lane location would result in disproportionately high and adverse impacts on the community’s EJ and Title VI populations, and that there is no intentional or unintentional discrimination that occurs in the facility site selection.

Background

The FRTA is currently operating out of a maintenance facility that is over 100 years old, requires significant and expensive renovation, does not have adequate space for maintenance functions, and the FRTA does not own the site or building. As a result, the FRTA is in need of a new site that can better support current operations and allow flexibility to evolve its operations in the future. To do this, the FRTA has selected five potential sites to accommodate the following needs:¹

- A parcel that is approximately 65,000 square feet;
- All buses and vans can be stored inside the facility or on the property. The current vehicle inventory (FY2019), which is not expected to grow in the foreseeable future, includes 37 vehicles, 8 buses, 8 minibuses, and 21 vans;
- Exterior space for employee and visitor parking and staging of buses/vans that are waiting for fueling, cleaning, and processing;
- Adequate space for maintenance and repairs inside the facility;
- Adequate office space for operations and maintenance personnel, in addition to training/conference rooms, lockers, restrooms, and storage areas;
- A site that is close to major roads and has connectivity with the JWO Transit Center in Greenfield to reduce deadhead miles; and
- A site that has limited impact on surrounding neighborhoods and the environment.

In general, the proposed facility will need to be large enough to support current and future needs, and be located close enough to the JWO Transit Center to maintain an efficient transit system. The location should not impact schedule reliability and should be appropriate for the proposed land use.

¹ As identified in the *Final Site Selection Analysis*, STV Incorporated, 2015.

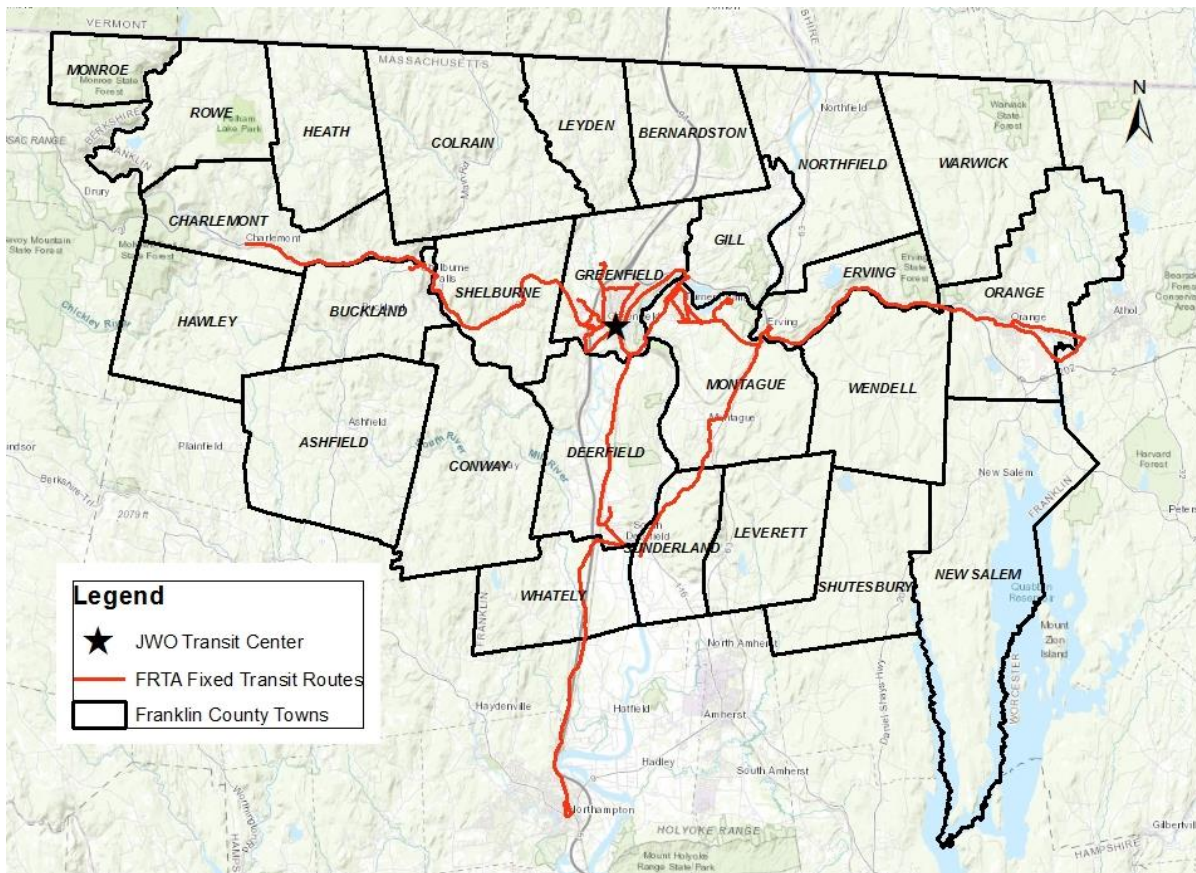
Community Profile

The FRTA’s fixed route, paratransit, and microtransit service area is located primarily in Franklin County. Because the proposed maintenance and operations facility would be mainly supporting these services,² the community profile of Franklin County is described here as an overview of the population that lives and works in the region and is served by the FRTA.

Land Use and Transportation Overview

Franklin County is the most rural county in the Commonwealth. Franklin County has a population of 70,577³ and a population density of 97 people per square mile in its 725 square mile area. The majority of the twenty-six towns in the county are very small – averaging 1,400 residents. The largest municipality, and only city, is Greenfield with a population of 17,474 people. The smallest populated municipality is the town of Monroe with a population of 86. See Figure 1 for map of Franklin County and its towns.

Figure 1: Map of Franklin County Towns and FRTA Bus Routes



² Most of FRTA’s demand response service is operated by municipal senior centers around the region and those vehicles and services originate at those locations and not the maintenance facility.

³ Unless otherwise noted, all socio-economic demographic data is from the U.S. Census Bureau, American Community Survey, Five-Year Estimates (2015-2019).

Much of the population is concentrated in the central portion of the county. The landscape outside these more developed areas is predominately forest, open space and farmland. The soils in the Connecticut River Valley are ideal for agricultural uses, and consequently, the region has a rich agricultural history. The land in the eastern and the western portions of the county are often referred to as the “hilltowns” due to their steep and rugged topography.

Because of the rural nature of the region, most of Franklin County residents rely on personal vehicles as their main mode of transportation. The FRTA was established in 1978 and has grown from providing public transit primarily in the Greenfield and Montague areas, to the majority of the county as well as connections to neighboring counties. Passenger rail, which last served Franklin County in the 1980s, returned with a stop at the JWO Transit Center in 2014. There are limited taxi services, and even more limited private rideshare services in Franklin County.

Population Overview

Population and Demographics

The Franklin County population currently totals 70,577 people. The total population has remained fairly stable over the last 30 years. Table 1 below shows the change in population over the last decade compared to the State.

Table 1: Total Population for Franklin County and State 2010 to 2019

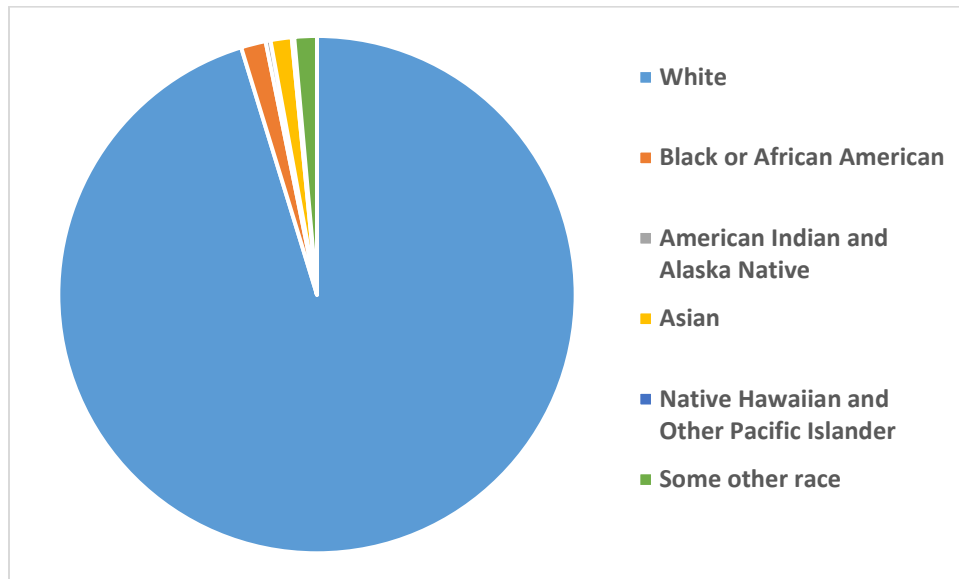
Geography	2010 Total Population	2019 Population Estimate	2010-2019	
			Change	Percent Change
Franklin County, MA	71,372	70,577	-946	-1.3%
Massachusetts	6,547,629	6,850,553	373,457	5.8%

Sources: U.S. Census Bureau - 2010 Census of Population & Housing, and 2019 American Community Survey, Five-Year Estimates.

The Franklin County population is aging. Currently the median age is 46.7, compared to the State’s median age of 38.1. In 2019, approximately 21% of the Franklin County population was over the age of 65. This is compared to a much lower 16% of the State’s population. Without an influx of younger people from outside the region, this share of seniors will only increase over time.

Historically, Franklin County has not been a racially diverse region. Currently, 93% of the population is White, while only 2% is Black. Another 4% identifies as Hispanic. This breakdown has remained fairly constant over the last several decades, with the exception that the Hispanic population has been slowly increasing. In 2000, it only composed 2% of the total Franklin County population, and today constitutes 4%.

Figure 2: Franklin County Population, by Race in 2019



The demographic data presented show that the Franklin County population size is slightly declining, is gradually getting older, and its racial and ethnic composition is only slightly changing. MassDOT, in partnership with the UMass Donahue Institute, has developed socio-economic forecasts for all regions of the Commonwealth, including Franklin County, to the year 2040.⁴ In general, the MassDOT forecasts show that the next twenty-five years will be a period of moderate growth for the State as a whole. Massachusetts is projected to grow at 12.7% between 2010 and 2040 with some places increasing more rapidly and some losing population. During this same time, Franklin County is projected to lose 2.7% of its total population, decreasing to 69,477 people by the year 2040. The total population loss for the county over this thirty-year timeframe is approximately 1,895 people. This population loss can largely be attributed to the aging of the large Baby Boomer group and fewer births to replace their loss. There is also very little immigration projected to occur in Franklin County to make up for this population loss. Immigration is the driving force of much of the state's growth.

Housing

Franklin County housing is predominately single family housing (65%) and owner-occupied (69%). The housing stock is older, with many of the units constructed before the 1940s (37%) and relatively few new units built in the last several decades (2% or 681). This means that much of the housing is most likely energy inefficient and expensive to maintain.

A healthy housing market is generally considered to have vacancy rates between 2%-3% for owner-occupied homes and 4%-5% for rental units. Franklin County vacancy rates are 1% for homeowners and 3% for rentals. This indicates a tight housing market, which could drive up home costs. Currently, 32% of homeowners with a mortgage, and 52% of renters, have unaffordable housing costs. This means that they are paying one-third

⁴ These forecasts do not show how the COVID-19 pandemic may impact the State's or the county's populations in the future.

or more of their incomes on housing costs. For comparison, the State's 30% of homeowners with mortgages, and 52% of renters, have unaffordable housing costs.

Employment and Income

In general, U.S. Census data shows that Franklin County's incomes are much lower than Massachusetts as a whole. In 2019, the County's median household income was \$60,950, which was much less (25% less) than Massachusetts's median household income of \$81,215. Another income indicator is per capita income. By this measure, Franklin County's income is still 18% lower than the Commonwealth's. Franklin County's per capita income is \$35,908, compared to the Massachusetts per capita income of \$43,761.

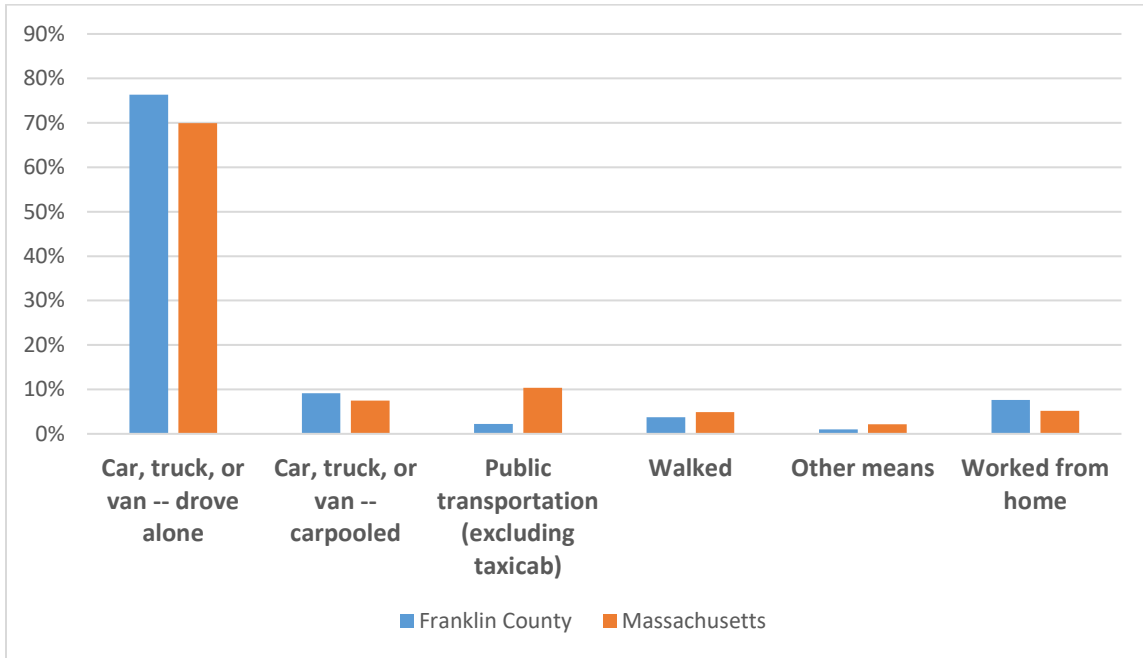
The lower per capita and median income figures for Franklin County reflect, in part, the lower average salaries and lower costs of living in western Massachusetts compared to Boston and other eastern Massachusetts communities. However, these statistics also reflect economic challenges within the region. These challenges include the loss of a historic manufacturing employment base. As numerous jobs have left Franklin County, they have often not been replaced by comparable employment opportunities with good wages and benefits, and has resulted in lower incomes in the region.

In 2019, the poverty rate for Franklin County was 9.7%, which was slightly lower than the State rate of 10.3%. The areas experiencing higher poverty rates than the state average include several of the downtowns and village centers that had once been traditional hubs of manufacturing employment, such as Montague (11.2%) and Greenfield (11.4%). In 2019, Franklin County's unemployment rate of 4.9% was slightly higher than the State's (4.8%). Among the individual towns, the unemployment rate can vary greatly.

Commuting

Because of the rural nature of Franklin County, the vast majority of residents rely on their personal vehicles to commute to work, travel to medical appointments, and conduct daily errands. Figure 3 below shows the breakdown of the modes of transportation that residents use for their commutes. A far lower percentage of workers use public transit as compared to the State. A total of 2.8% of workers in the county do not have a vehicle.

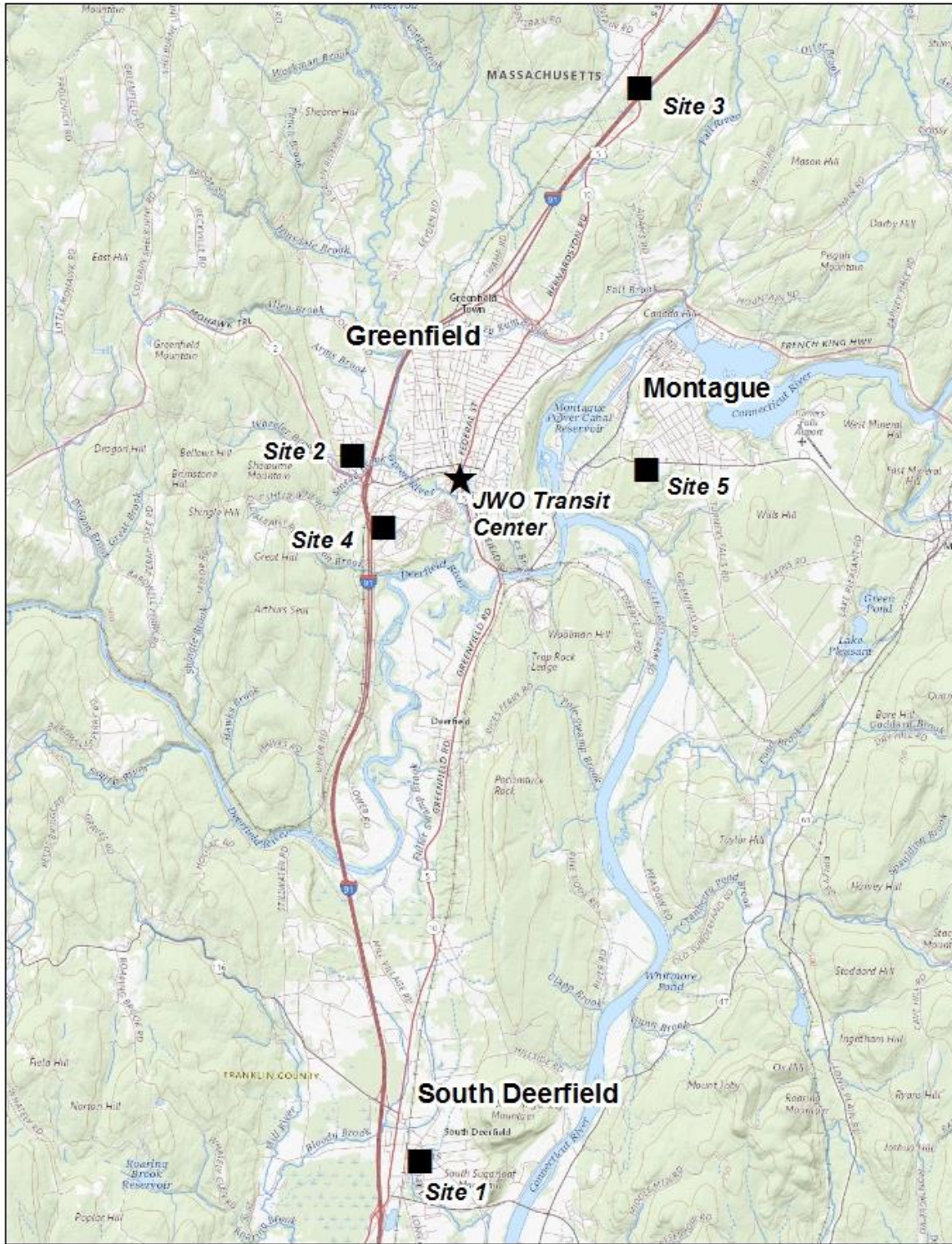
Figure 3: Modes of Transportation for Franklin County Workers, 2019



Potential Maintenance Facility Sites

As mentioned, the FRTA conducted a site selection analysis in 2015 and narrowed the search to four potential sites. After the preferred site in that list was discovered to have too many environmental issues, a fifth site was added and is now considered the preferred site. The following section describes the five potential sites that have been examined for a maintenance facility. The map below shows the locations of the sites in relation to the JWO Transit Center in Greenfield.

Figure 4: Potential Maintenance Facility Sites



Site 1: 15 Jewett Avenue, Deerfield

This site is located in South Deerfield and is 8 miles from the JWO Transit Center. It is zoned as Residential/Agricultural and is a total of 15 acres. The parcel is bordered by South Main Street on the west and Sugarloaf Street on the east, and is conveniently located near the major roads of Rt. 5/10 and Rt. 116. Adjoining land uses include the Town of Deerfield's Highway Department maintenance facility, a private manufacturer, a wooded area, and a mix of commercial and residential properties. The majority of the site is currently vacant, but partially paved due to its former use as the Oxford Pickle manufacturing facility that has since been removed. Access to the site would be from Sugarloaf Street and Coates Avenue as buses drive to the primary travel corridor of Route 5/10 and go north to the JWO Transit Center. The site is currently owned by the Town of Deerfield.

Site 2: 215 Shelburne Road, Greenfield

This site is located near downtown Greenfield and is only 2 miles from the JWO Transit Center. It is zoned as General Commercial and is 4.6 acres. The parcel is bordered by Colrain Road to the east and Shelburne Road to the south. The parcel is very conveniently located to Route 2 and I-91. Adjoining land uses include an auto dealer, a large shopping center, a BJ's Wholesale Club and parking lot, a wooded area, and a number of residential homes. This site is the closest of the potential sites to the JWO Transit Center. The parcel is currently owned by Eversource Energy with a parking lot and an approximately 40,000 square foot service center building that contains offices and garages. Access to Route 2 would be via Colrain Road.

Site 3: 1385 Bernardston Road, Greenfield

This site is located in northern Greenfield and is 5 miles from the JWO Transit Center. It is zoned as Rural Residential and is 13.7 acres. The parcel is located between Rt. 5/10 and I-91 and is abutted by a wooded area, and a few residential/commercial uses. It is currently owned by Indoor Action and is used as a sports complex with a 45,000 square foot inflatable dome, offices, and separate warehouse structure with an indoor gymnasium. Access to the site would be from Route 5/10. The parcel is visible from I-91.

Site 4: 180 Laurel Street, Greenfield

This site is located near downtown Greenfield and is 1.5 miles from the JWO Transit Center. It is zoned as General Industrial and is 17.3 acres in size. The parcel is bordered by I-91 to the west, a cemetery to the south, Wisdom Way on the east, and residential uses to the north along Laurel Street. The property is currently owned by the Town of Greenfield, but it was previously owned by the Honeywell Corp., who retains the existing environmental obligations and was responsible for the remediation of it as a Brownfield site. The structures on the parcel have been cleared and the remediation has now been completed, but long-term monitoring of the site continues by the previous owner. Access to the site would be via Laurel Street onto River Street.

Site 5: Sandy Lane, Montague

This site is located in Montague off of Turnpike Road and is 4 miles from the JWO Transit Center. It is zoned as Industrial and is 5 acres in size. The parcel is bordered by the Town of Montague's Transfer Station, Judd Wire manufacturing, solar fields, the Franklin County Sherriff's Office Regional Dog Shelter, and a large wooded area. The property is currently vacant and is owned by the Town of Montague. Access to the site

would be via Sandy Lane from Turnpike Road, where FRTA vehicles would travel west to Montague City Road to Rt. 5/10 in order to access the JWO Transit Center.

Title VI Equity Analysis

The information presented below summarizes the Title VI equity analysis and evaluates whether each site has a disparate impact on minorities and/or a disproportionate burden on low-income groups. According to the FTA Title VI Circular 4702.1B, a minority person is defined as anyone who identifies as any of the following categories:

- Black or African American;
- American Indian and Alaska Native;
- Asian;
- Native Hawaiian or Other Pacific Islander; and
- Hispanic or Latino, which includes persons of Spanish culture or origin, regardless of race.

The FTA Circular 4702.1B defines a minority population as any readily identifiable group of minority persons who live in a geographic proximity.

In terms of low-income populations, FTA Title VI guidance encourages agencies to use a locally developed threshold for identifying low-income populations, as long as they are inclusive of Department of Health and Human Services (DHHS) poverty guidelines. For this equity analysis, low-income is defined as 60% of the median income of FRTA’s service area of Franklin County. In 2019, the county’s median household income was \$60,950. This means that 60% of the median income, and therefore low-income, is defined as \$36,570. The U.S. Census Bureau’s five-year American Community Survey (2005-2019) only provides income data broken into incremental ranges (ex. \$25,000 - \$29,999; \$30,000 - \$34,999; \$35,000 - \$39,999, etc.). Based on this data availability, low-income households for each site analysis will be those that are at \$34,999 or below.

To conduct this Title VI equity analysis, U.S. Census data was used at the block group level for each site. Block groups are statistical divisions of census tracts and generally contain between 600-3,000 people. Because Franklin County is so rural, this level of data is the smallest that can reliably be used. However, because of the rural nature, the block group’s geographic size can also be relatively large – the average block group size is 10 square miles in Franklin County. This means that there could be large variations at the sub-block group level in terms of population’s characteristics. Listed below is each sites’ corresponding block group:

Site Address	Town	Block Group
Sandy Lane	Montague	Block Group 2, Census Tract 407.02,
15 Jewett Avenue	Deerfield	Block Group 4, Census Tract 409
215 Shelburne Road	Greenfield	Block Group 1, Census Tract 410
1385 Bernardston Road	Greenfield	Block Group 3, Census Tract 410
180 Laurel Street	Greenfield	Block Group 2, Census Tract 414

Title VI Equity Demographics

This section describes the data collected for use in the Title VI Equity Assessment.

Minority Populations for each Site

Table 2 below shows the minority populations for each of the block groups in which the potential sites are located, as well as the towns in which they are located. In 2019, Franklin County's population was 9% minority, which is similar to several of the block groups below. Hispanics are the largest minority in Franklin County. The Towns of Deerfield, Greenfield, and Montague have higher proportions of minorities ranging between 11% and 17%.

Table 2: Minority Population for Franklin County and Site Block Groups, 2019

Location	Total Population	White alone	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Some other race alone	Hispanic or Latino	Total % Minority Population
Sandy Lane, Montague	1,491	1,369	0	14	15	0	0	8%
15 Jewett Ave, Deerfield	480	465	0	0	0	0	32	10%
215 Shelburne Rd, Greenfield	698	695	3	0	0	0	0	0%
1385 Bernardston Rd, Greenfield	881	848	0	0	25	0	41	8%
180 Laurel St, Greenfield	1,455	1,314	0	0	17	86	107	17%
Deerfield	5,017	4,825	4,649	158	0	0	197	11%
Greenfield	17,375	16,947	15,733	391	13	0	1,331	17%
Montague	8,279	7,966	7,485	160	127	0	350	14%

Low-Income Populations for each Site

Table 3 below shows the amount of low-income households living in each of the block groups in which the potential sites are located, as well as the towns in which they are located. Almost a third of Franklin County households are considered low-income (below \$34,999 a year). The percentage of low-income households varies quite significantly among the potential sites, as well as in the towns of Deerfield, Greenfield, and Montague in which the potential sites are located.

Table 3: Low-Income Population for Site Towns and Site Block Groups, 2019

Location	Total Households	Households with Annual Incomes Under \$34,999	% Households with Annual Incomes Under \$34,999
Sandy Lane, Montague	651	108	17%
15 Jewett Ave, Deerfield	286	93	33%
215 Shelburne Rd, Greenfield	329	70	21%
1385 Bernardston Rd, Greenfield	415	77	19%
180 Laurel St, Greenfield	631	267	42%
Deerfield	1,960	328	17%
Greenfield	8,063	2,850	35%
Montague	3,804	1,242	33%

Definition of Disparate Impact and Disproportionate Burden

This Title VI Equity Analysis examines whether each of the potential maintenance facility sites would have a Disparate Impact on minority populations or a Disproportionate Burden on low-income populations.

According to the FTA’s Title VI Circular 4702.1B:

- Disparate Impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient’s policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.
- Disproportionate Burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

The FTA Title VI Circular provides an example for agencies as guidance in selecting the appropriate threshold of significance for this analysis. It suggests a threshold of 10%. The U.S. Supreme Court has held that differences of less than 20% when conducting a disparity analysis are within the range of difference that can occur by mere chance. Because the Census block groups can be so large in Franklin County, there can be wide variability of populations and its demographics within that geographic area. As a result, the FRTA will use the 20% threshold to evaluate potential impacts of various siting alternatives on minority and low-income populations. Therefore, if the difference between the ratios of minority to non-minority populations

within the site block groups as compared to the towns in which they are located is more than 20%, then the proposed change would be determined to pose a potential disparate impact or disproportionate burden.

Title VI Assessment Results

The results of the assessment below look at whether or not disparate impacts to minority populations or disproportionate burdens to low-income populations would result from the construction of a new FRTA maintenance facility at each of the sites. The assessment found that there is no disparate impact nor a disproportionate burden from any of the five potential sites.

This analysis applied the 20% threshold to compare the percentage of minority and low-income populations for each site's block group to the total minority and low-income populations at the town level in which each site is located. As shown in Tables 4 and 5 below, none of the potential five sites meet the 20% threshold for determining a disparate impact for minority populations or a disproportionate burden on low income populations.

Table 4: Potential Disparate Impact on Minority Populations for Site Block Groups and Site Towns, 2019

	Sandy Lane, Montague	15 Jewett Ave, Deerfield	215 Shelburne Rd, Greenfield	1385 Bernardston Rd, Greenfield	180 Laurel St, Greenfield
Total % Minority Population in Site Block Group	8%	10%	0%	8%	17%
Total % Minority Population in Site Town	14%	11%	17%	17%	17%
Total % Difference	-6%	-1%	-17%	-9%	0%
Disparate Impact? (Yes/No)	No	No	No	No	No

Table 5: Potential Disproportionate Burden on Low Income Populations for Site Block Groups and Site Towns, 2019

	Sandy Lane, Montague	15 Jewett Ave, Deerfield	215 Shelburne Rd, Greenfield	1385 Bernardston Rd, Greenfield	180 Laurel St, Greenfield
Total % Low Income Population in Site Block Group	17%	33%	21%	19%	42%
Total % Low Income Population in Site Town	33%	17%	35%	35%	35%
Total % Difference	-16%	16%	-14%	-16%	7%
Disproportionate Impact (Yes/No)	No	No	No	No	No

Site Alternatives Equity Assessment

Based on the population analysis above, none of the proposed sites meet the threshold of Disparate Impact on minorities or Disproportionate Burden on low-income populations. The Sandy Lane site has the lowest concentration of low-income populations compared to the other four sites, and has the second lowest concentration of minorities. While the 180 Laurel Street site is one of the closest sites, it has the highest percentage of minority and low-income populations, in addition to the aforementioned identified environmental concerns. The other site that is closest to the JWO Transit Center is 215 Shelburne Road in Greenfield. This location also has a higher percentage of minority populations than the Sandy Lane site. This location would require the removal of the existing Eversource Energy building, and access to the site would be through the already congested traffic signal at Colrain Road and Route 2. The Jewett Avenue site has the highest concentration of low-income population, and is the farthest from the JWO Transit Center at 8 miles which would greatly increase the deadhead miles that the buses would have to travel. As a result of this analysis, the Sandy Lane site is the preferred site for the new FRTA maintenance facility.

Preferred Site Cumulative Analysis

This section evaluates the Sandy Lane site in more detail, as well as other similar facilities nearby, to determine potential community impacts and address whether cumulative adverse impacts may occur.

The Sandy Lane site in Montague is located on a parcel at the end of Sandy Lane and is zoned as Industrial. Access to this road is from Turnpike Road, where bus drivers would turn primarily right onto Sandy Lane to travel to the maintenance facility. The proposed new facility would be on a parcel currently owned by the Town of Montague. Adjoining it is the town's transfer station, a solar field, and the Franklin County Sheriff's Office Regional Dog Shelter. Also located on Sandy Lane is the manufacturing company, Judd Wire, Inc, which is a light manufacturing company with minimal impacts on its neighbors in terms of sound and/or emissions. Both the transfer station and Judd Wire do generate truck traffic for deliveries and shipments. Along Turnpike Road are single family residential homes. The maintenance work at the new site will be conducted inside the facility, which will minimize noise disruptions on neighbors.

Figure 5: Sandy Lane site in Montague



Because the site is currently vacant, there will be an increase in traffic levels on both Sandy Lane and Turnpike Road. However, traffic volumes on Turnpike Road are not high and congestion is not an issue on this roadway. The maintenance facility should not cause traffic issues or congestion with its current fleet of only 37 vehicles.

The Sandy Lane site meets the purpose and need for the new FRTA maintenance facility due to the space, availability, and location. Because the site is located in an Industrial Zone with other similar uses, there would not be any substantial changes in use for the area. The maintenance and service work at the new site will be conducted inside the facility, which will minimize noise disruptions on neighbors. The deadhead miles would be limited with the JWO Transit Center located only 4 miles away and downtown Turners Falls (a frequent bus destination) located only 1.5 miles away. In addition, because the Sandy Lane site also has the lowest concentration of low-income populations compared to the other four sites and has the second lowest concentration of minorities, a maintenance facility at this location would not result in cumulative impacts or burdens disproportionately borne by Title VI protected populations. The other adjoining land uses are light industrial, and two of the abutters, the solar fields and the Regional Dog Shelter have no, or a very minimal, impact on the area. It is unlikely, therefore, that the addition of a bus maintenance facility would create a cumulative effect so that the community is adversely affected. Therefore, Sandy Lane should be the preferred alternative for FRTA's new maintenance facility.

Environmental Justice and Community Impacts

The purpose of this section is to evaluate the community and environmental justice (EJ) impacts and benefits from a proposed FRTA maintenance facility on Sandy Lane in Montague. Federal Executive Order 12898 requires federal agencies to “make achieving environmental justice part of its mission by identifying and

addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.”

The community impact assessment evaluates the effects of an action, such as relocation of a new bus maintenance facility, on a community and its quality of life. Federal guidance emphasizes that a community impact assessment should be applied throughout the transportation decision-making process, from planning through project development and implementation. The Federal regulation 23 USC 109(h) requires that the U.S. Department of Transportation “assure that possible adverse economic, social, and environmental effects relating to any proposed project on any Federal–aid system have been fully considered in developing such project, and that the final decisions on the project are made in the best overall public interest, taking into consideration the need for fast, safe, and efficient transportation, public services, and the costs of eliminating or minimizing such adverse effects.”

The community study area for this assessment will be larger than that examined for the Title VI assessment above in order to capture possible effects on the surrounding community. The Sandy Lane parcel is located just outside the southern boundary of the Village of Turners Falls in Montague. The study area will include a half-mile area around the centroid of the parcel. Portions of two additional block groups fall within this half-mile buffer. The study area block groups include:

- Block Group 3 Census Tract 401.01;
- Block Group 1, Census Tract 407.02; and
- Block Group 2, Census Tract 407.02 (where parcel is located).

The study area can be seen in the map in Figure 6. Within this area, there is a residential single family neighborhood to the north and northeast of the preferred site; predominately single family homes along Turnpike Road to the west; Park Villa, a subsidized housing apartment complex for seniors and persons with disabilities, is located several hundred feet east and across Turnpike Road from the entrance of Sandy Lane; there is also a cemetery, large town-owned wooded area, and two solar fields within the study area. There is very little commercial business in the study area, other than small home-based businesses and the Judd Wire manufacturing facility directly next to the preferred parcel. Directly abutting the parcel to the south is the Montague transfer station.

Figure 6: Community Study Area for the Sandy Lane Site with Half-Mile Buffer around Site.



Displacements

The new FRTA bus maintenance facility at Sandy Lane will not result in any displacements. The parcel is currently vacant with no existing structures. The access to the site should not impede the access of neighboring operations, such as Judd Wire or the Montague transfer station, also located on Sandy Lane.

Access and Travel Patterns

As in Franklin County, the most popular mode of transportation within and through the study area is by personal vehicle. Data from the U.S. Census shows that the majority of people in the study area (the three block groups that the half-mile buffer is located inside) commute to work by personal vehicle (92%). Another 2% take the bus (34 total workers) and 5% work from home (90 workers).

Turnpike Road is the main collector running east-west through the study area allowing travelers to connect to downtown Greenfield with the rest of the Town of Montague. A secondary collector is Montague Street, which connects Turnpike Road to the residential neighborhood to the northeast and downtown Turners Falls. There are no roads or developments south of the Sandy Lane site as this is a forested area.

There are no sidewalks on Sandy Lane. Turnpike Road does have sidewalks, except for a quarter mile stretch at the Sandy Lane intersection. There are no other sidewalks within the study area. There is a crosswalk on Turnpike Road connecting to the Park Villa apartments where the FRTA has a bus stop for its Route 24. In addition, there are no designated bicycle lanes or signage, although bicyclists traveling in the area are not uncommon.

The new FRTA maintenance facility does not propose any changes to access and travel patterns to Sandy Lane other than a new driveway entrance on that roadway. The FRTA will install sidewalks along the length of Sandy Lane as part of a potential purchase of the site to accommodate pedestrian access. There are no changes proposed for Turnpike Road. The facility will include parking onsite for the X employees that are expected to work at the facility, so that there will be no spillover effects on neighboring parking lots or roadways, nor should there be an impact to AM or PM traffic flows from that small number of staff. Bus traffic is also not expected to adversely impact travel times due to the small number of vehicles in the FRTA fleet and the fact that many of the vehicles will be departing before and after AM and PM peak traffic times.

Affected Neighborhoods and Businesses

The proposed new bus maintenance facility at Sandy Lane could potentially result in minimal impacts to nearby neighborhoods. Because the site is located on Sandy Lane within an Industrial Zone, most of the immediate abutting neighbors are other light industrial uses. The greatest impact could be on the approximately ten abutting single family residential homes that are located on the southern side of Turnpike Road (north of the parcel). The impacts these homes could experience during the operation of the facility would be limited to the sound of buses starting and running. Some FRTA routes do begin by 6:00AM, which means there could be noises beginning early for abutting uses. However, the maintenance facility will have a required setback of at least 50 feet from the residential parcel boundaries and, in actuality, the setback will be even greater due to the dimensional shape of the parcel. In addition, the technology for electric buses is greatly advancing and the Commonwealth of Massachusetts has a goal of having all public transit bus purchases to be electrified by 2035.⁵ Electric buses are very quiet and will have almost no sound impacts on abutting uses.

The Park Villa apartments and the residential neighborhood to the northeast should not experience any adverse impacts from the proposed facility as the buses will not travel through these areas other than designated stops on transit routes and there should be no increased congestion on Turnpike Road. These locations are also too far to hear any of the potential noise from the site.

The existing sidewalk gap on Turnpike Road at Sandy Lane should be completed to enhance pedestrian safety through the study area.

Environmental Justice

The preferred site at Sandy Lane, nor the surrounding block groups, have been identified as official environmental justice areas by Massachusetts. The Commonwealth's Environmental Justice policy defines an environmental justice area as a census geography with 25% or more of a population that identifies as a minority, or has 25% or more households with low-incomes. Neither of these conditions are met for the site or the study area.

⁵ "A Vision of the Future of Massachusetts' Regional Transit Authorities," Report of the Task Force on Regional Transit Authority Performance and Funding. April 5, 2019. <https://www.mass.gov/doc/a-vision-for-the-future-of-massachusetts-regional-transit-authorities/download>

Limited English Proficiency

The FRTA conducted a Four Factor analysis in its 2016 Title VI Plan and found that the number and percentage of LEP individuals are much less than the FTA’s recommended “Safe Harbor” threshold. The largest LEP language group is Spanish-speaking with a total of 332 people or 0.5% of the Franklin County population. These numbers are at the County level for 2016. The 2019 census data shows for the block groups within the study area that there are no limited English speaking households in any language group.

Public Participation

When evaluating locations for a maintenance facility, the FTA Title VI Circular instructs regional transit authorities to “engage in outreach to persons potentially impacted by the siting of facilities.” In the process of conducting this Title VI Equity Analysis, the FRTA has reached out to the community around the Sandy Lane preferred site and the Town of Montague to understand potential community concerns and expectations and to answer any questions.

Due to the ongoing COVID-19 pandemic, a community meeting was held virtually in **March X, 2021**. The meeting was advertised through social media, mailings to abutters, and through the Town of Montague’s website. **This meeting was attended by _____ and the following issues were raised:**

List any issues here

How were these issues addressed?

To maximize public support and to ensure that the FRTA maintenance facility is a good neighbor, an ongoing collaborative approach will be necessary to address any issues that may arise.

Conclusions

The Title VI Equity and Environmental Justice assessment examined the potential community impacts from a new FRTA bus maintenance and operations facility on Sandy Lane in Montague. The analysis shows that the new facility would not detrimentally impact the community around the preferred site and that there would be no displacements.

Because the surrounding community is not an EJ designated area and there are no LEP households known to live in the area, the proposed project would not impact any EJ or vulnerable populations through displacements or separations, nor would it have any disproportionately high or adverse impacts on minorities and low-income populations.

Overall, the new maintenance facility would help the FRTA increase service reliability, improve system operations, and be able to transition its fleet to a more modern hybrid/electric fleet.