

Title VI Program

Green Mountain Transit Authority

May 2023

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Statement of Policy

Green Mountain Transit Authority (GMT), as a federal grant recipient, is required by the Federal Transit Administration to conform to Title VI of the Civil Rights Act of 1964 and its amendments. Title VI of the Civil Rights Act of 1964 requires that no person in the United States, on the grounds of race, color or national origin be excluded from, be denied the benefits of, or be subjected to discrimination, under any program or activity receiving federal financial assistance. Presidential Executive Order 12898 addresses environmental justice in minority and low-income populations. Presidential Executive Order 13166 addresses services to those individuals with limited English proficiency.

GMT is committed to enforcing the provisions of Title VI and protecting the rights and opportunities of all persons associated with GMT or affected by its programs. GMT's commitment includes vigorously enforcing all applicable laws and regulations that affect GMT and those organizations, both public and private, which participate and benefit through our programs.

GMT will take positive and realistic affirmative steps to ensure that all persons and/or firms wishing to participate in its programs are given an equal and equitable chance to participate. GMT's subrecipients and contractors are required to prevent discrimination and ensure nondiscrimination in all of their programs, activities and services.



Clayton Clark, General Manager

Notice to the Public

GMT ensures that its passengers and the public receive notice of their Title VI rights, including 1) a statement that GMT operates without regard to race, color, and national origin, 2) instructions on how the public can file a Title VI complaint, and 3) information to the public about how to obtain more information about their Title VI rights and GMT's Title VI responsibilities. The notification to the public on the GMT website is located at <http://ridegmt.com/title-vi/> and is reproduced below.

GMT provides notice of Title VI rights to passengers and the public in the following ways:

- **GMT Facilities:** The above notice is posted in flyer format at the front desk at GMT's Administrative Facility at 101 Queen City Park Road, Burlington, Vermont, at the rural facility in Berlin, VT, and at the customer service kiosks at GMT's Downtown Transit Center on St. Paul Street in Burlington and at the Montpelier Transit Center. These locations are the primary areas where GMT passengers receive information about GMT's services.
- **Vehicles:** The notice on the website has been converted to a sticker format for placement on all GMT revenue vehicles.

Title VI– Chittenden County

GMT operates its programs and services without regard to race, color, and national origin in accordance with the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with GMT.

For more information on GMT's civil rights program and the procedures to file a complaint, contact GMT at 802-864-2282 (VT Relay 800-253-0191), info@RideGMT.com, or at our administrative office at 101 Queen City Park Road, Burlington, VT 05401. For more information visit www.RideGMT.com

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington DC, 20590.

Title VI– Central Vermont | Franklin-Grand Isle

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If you would like more information about your Title VI rights or to file a complaint directly with the Vermont Agency of Transportation, Office of Civil Rights, call 802-595-6959.

[Patricia Martin](#)

State of Vermont Civil Rights Data & Reporting Manager

Title VI and ADA Coordinator

802-595-6959

- **GMT Bus Map & Guide:** GMT produces a Bus Map & Guide—which contains detailed route, schedule, and system information—at least three times a year. Separate booklets are prepared for the urban and rural portions of the service area. The Title VI notice is included in every Bus Map & Guide publication. The Bus Map & Guide is distributed for free on all GMT vehicles, at the two main customer service facilities, and throughout the service area at local businesses and municipal offices. The notifications in the Bus Map & Guide documents are shown below.

Title VI of the Civil Rights Act

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Notification in
Urban BM&G

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If you would like more information about your Title VI rights or to file a complaint directly with the Vermont Agency of Transportation, Office of Civil Rights, call 802-595-6959.

Notification in
Rural BM&G

Title VI Complaint Procedures, Form, & Complaint Log

1) Receiving and Documenting Complaints:

a) Complaints via Phone Call

When a member of the public wishing to file a Title VI complaint calls GMT and states that he/she wishes to file a Title VI complaint, the front desk transfers the call to GMT's Title VI officer who will document the complaint using the Title VI Complaint Form (follows below). Should the Title VI officer be unavailable to take the call, the front desk shall record the individual's contact information and state that the Title VI officer will call the person back. The Title VI officer shall call the individual back within five business days of receiving the message. If the Title VI officer will be out of the office longer than five business days, an interim Title VI officer shall be selected and he/she shall receive the Title VI complaints calls until the permanent Title VI officer returns.

In the event that an individual calls in a complaint but does not specifically state that he/she wishes to file a Title VI complaint and the call is forwarded to the Operations Department following normal (non-Title VI) complaint procedures, the person who takes the call shall follow the normal (non-Title VI) complaint documentation procedures. If after the call is taken, it becomes clear that the complaint involves Title VI, the Operations Department shall forward the person's contact information to the Title VI officer. The Title VI officer shall call the individual back and document the Title VI complaint using the Title VI Complaint Form.

b) Complaints via Email/Website

When a member of the public submits a complaint via email that is related to Title VI, it is forwarded to the Title VI officer by whichever staff member receives it. If the emailed complaint does not include sufficient information to fill out the Title VI Complaint Form, the Title VI officer will contact the individual to obtain the needed information. In all cases, the Title VI officer will reply to the individual to confirm receipt of the complaint.

The Title VI officer shall reply to the email within five business days. If the Title VI officer will be out of the office longer than five business days, an interim Title VI officer shall be selected and he/she shall be forwarded the Title VI complaints emails until the permanent Title VI office returns.

2) Enter the Complaint into the GMT Title VI Complaint and Lawsuit Log

Any Title VI complaint received by GMT shall be entered into the GMT Title VI Complaint and Lawsuit Log. The following information must be included in the log:

- Date the complaint was filed
- A summary of the allegations
- The status of the investigation
- Actions taken by the recipient in response

3) Internal Investigation of Title VI Complaints

After a Title VI complaint is received and fully documented using the Title VI Complaint form, the Title VI officer will initiate an internal investigation of the complaint. Such an investigation might include, but is not limited to, speaking with administrative staff, Maintenance Department staff, and/or Operations Department staff (bus drivers), reviewing company policies and procedures, reviewing on-bus video, and evaluating service characteristics and schedules. If requested by the complainant or warranted based on the investigation, the Title VI officer will contact the complainant at the conclusion of the investigation to report on any findings or potential changes as a result of the complaint.

Notice shall include information regarding appeal rights of the complainant and instructions for initiating such an appeal. The first level of appeal is to the General Manager of GMT. The General Manager will review all of the facts of the case and the process of the internal investigation. If any aberrations from normal procedure are discovered or if new facts come to light, GMT will reconsider the determination.

If the complainant is still dissatisfied with the determination and/or resolution set forth by GMT, the result may be appealed to VTrans. Complainant will be advised to contact:

Vermont Agency of Transportation
Office of Civil Rights & Labor Compliance
219 North Main Street
Barre, VT 05641

Appeals may also be submitted by telephone or fax. Contact numbers are as follows:

Phone: (802) 595-6959

Fax: (802) 479-5506

As GMT is a direct recipient of federal funds, an appeal can also be made directly to the Federal Transit Administration. Complainant will be advised to contact:

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

4) Update the GMT Title VI Complaint and Lawsuit Log

After conducting the internal investigation, the Title VI officer must update the status of the complaint in the GMT Title VI Complaint and Lawsuit Log. This will include an explanation of any actions taken as a result of the complaint and/or internal investigation.

GMT Title VI Complaint Form

To be filled out by GMT Title VI Officer for complaints received by phone or email. The form may be filled out directly by the individual making the complaint.

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party: _____				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				

Section IV		
Have you previously filed a Title VI complaint with this agency?	Yes	No
Section V		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?		
<input type="checkbox"/> Yes <input type="checkbox"/> No		
If yes, check all that apply:		
<input type="checkbox"/> Federal Agency: _____		
<input type="checkbox"/> Federal Court _____		<input type="checkbox"/> State Agency _____
<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.		
Name:		
Title:		
Agency:		
Address:		
Telephone:		

Record of Title VI Investigations, Complaints, Or Lawsuits

Since the submission of the last Title VI Program in 2020, GMT received one complaint from a passenger who felt that their civil rights had been violated. This complaint and its resolution status are summarized below.

Allegations	Status	Actions Taken
9/30/22		
<p>When I boarded the bus, the driver (Mike) informed me that I did not board at the correct location. I responded that the regular driver stops at all of the crosswalks (in downtown St. Albans). Mike then started speaking in a way that made me feel verbally attacked, stating that he hates St. Albans because of "people like me" mouthing off. He continued to speak in an attacking way and was soon joined by a friend of his, who allied with him in speaking disrespectfully and belligerently toward me (including threatening to throw me off the bus without cause). I spoke up in my defense but decided to disengage for the remainder of the ride in order to deescalate the situation. When I was disembarking at the UVM Medical Center, I informed Mike, "It's unacceptable to speak disrespectfully to customers, and I will follow up with GMT." This prompted him to start yelling at me and aggressively thrusting his finger a few inches from my body. His friend also joined the verbal attack. I recorded this episode on my cell phone and have sent the link to GMT. I believe that Mike was interacting with me based on racial bias (i.e., using a well-known racist trope: "people like you") and would not have felt entitled/empowered to bully a White customer in the way that he tried to bully me.</p>	<p>Ruled as an unfounded Title VI complaint.</p>	<p>The driver was given a performance improvement plan. The Union issued a grievance and the GM and Title VI officer met with the driver and the Union representative to discuss the incident.</p>

Language Assistance Plan

Introduction

On Aug. 11, 2000, President Clinton signed Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency, to clarify Title VI of the Civil Rights Act of 1964. The executive order was issued to ensure accessibility to programs and services to otherwise eligible individuals not proficient in the English language.

The executive order stated that individuals with a limited ability to read, write, speak and understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter. These individuals are referred to as being limited in their ability to speak, read, write, or understand English, hence the designation, “LEP,” or Limited English Proficient.

The USDOT published “Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficiency” in the Dec. 14, 2005, Federal Register. The guidance explicitly identifies transit operations such as GMT as organizations required to follow Executive Order 13166.

The guidance applies to all DOT funding recipients, which include state departments of transportation, state motor vehicle administrations, airport operators, metropolitan planning organizations, and regional, state, and local transit operators, among many others. Coverage extends to a recipient’s entire program or activity; i.e., to all parts of a recipient’s operations.

A. Four Factor Analysis

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

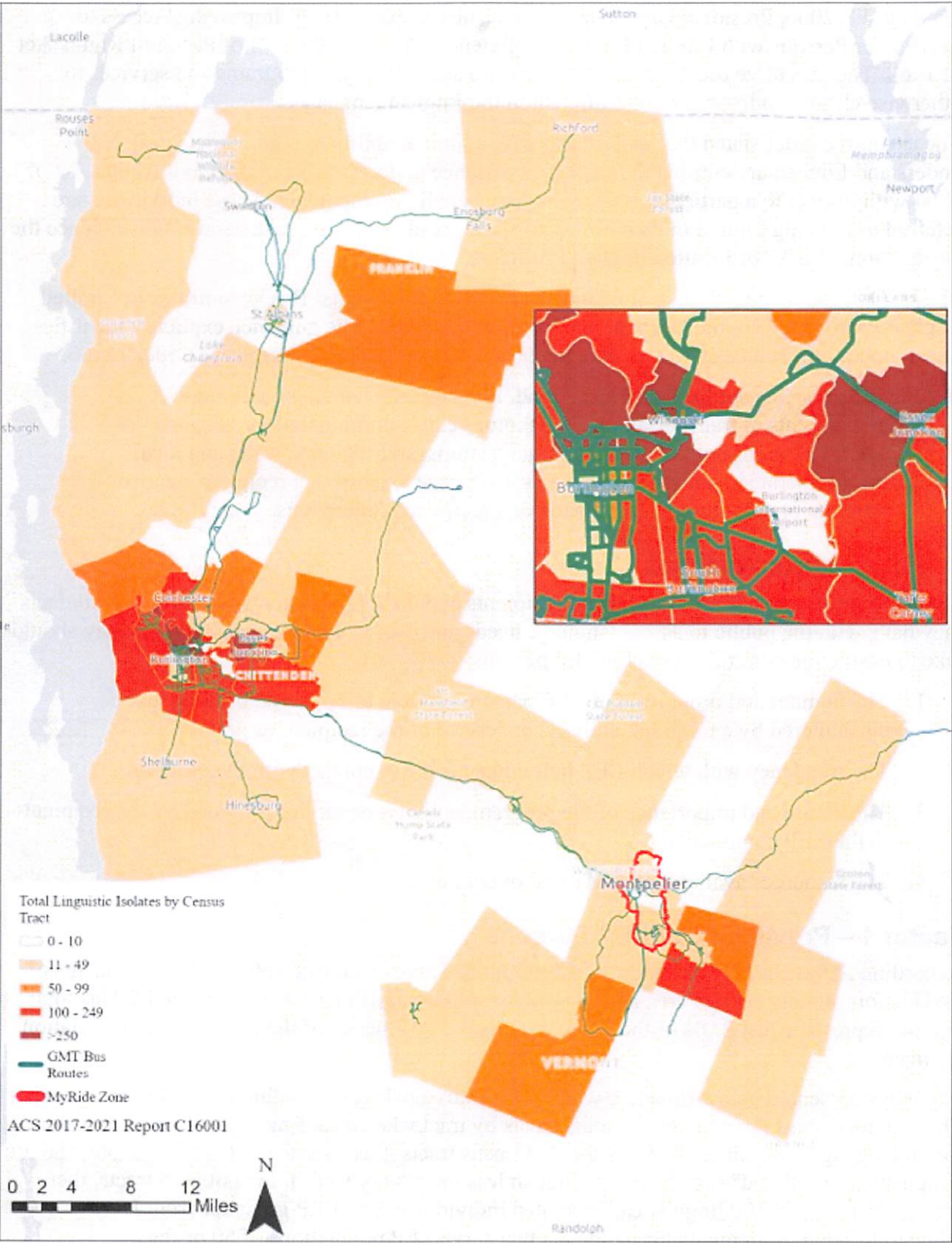
1. The number and proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to the LEP community.
4. The resources available to GMT and overall cost.

Factor 1 – Prevalence of LEP Persons

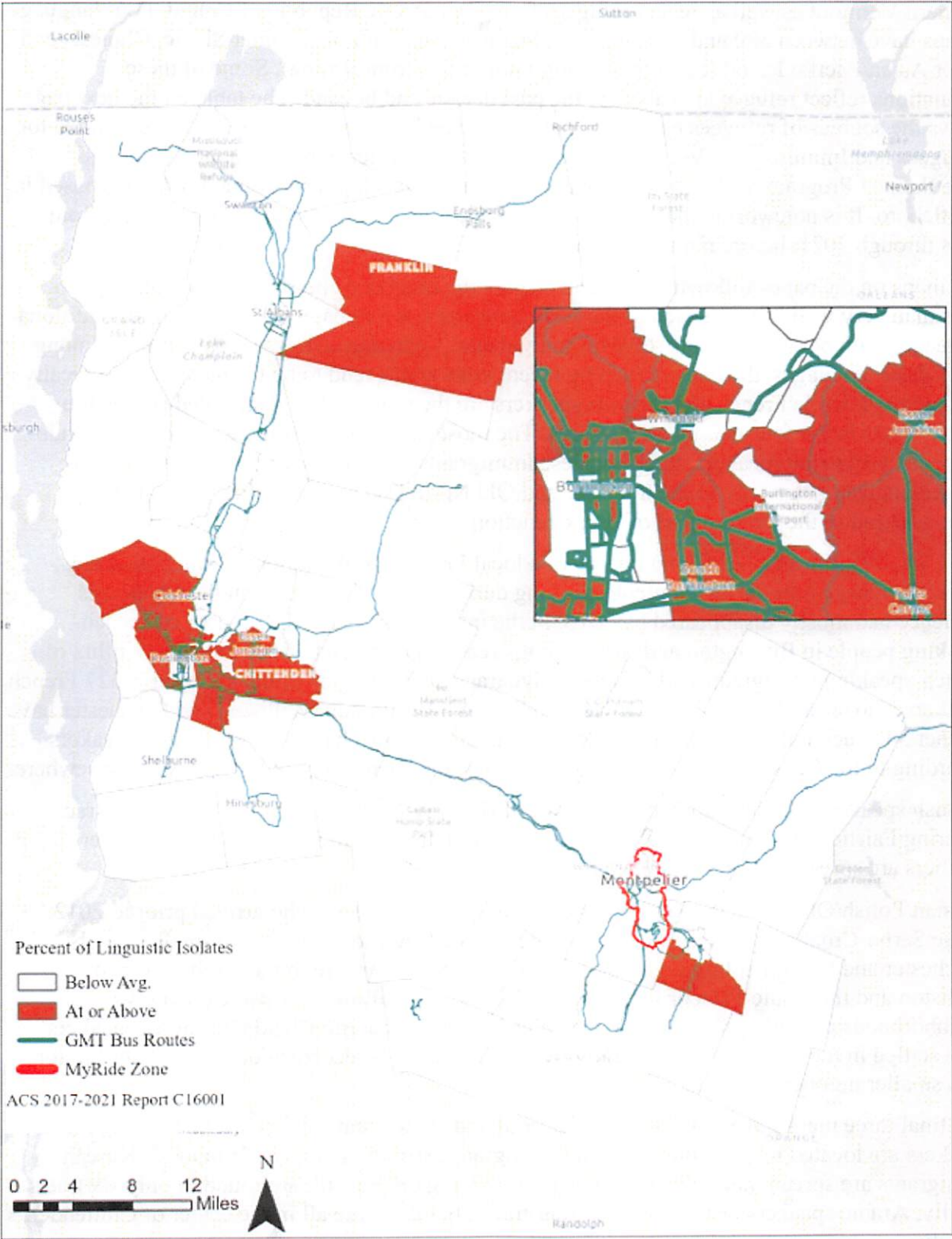
According to the 2017-2021 American Community Survey (report C16001), 5,578 residents of GMT’s four-county service area ages 5 or older spoke English less than “very well.” This total number represents just 2.0% of the population ages 5 or older as of the 2021 Census population estimate.

The maps presented below illustrate where LEP individuals reside within the GMT service area. The first map shows the number of individuals by tract who speak English less than “very well” for all languages combined. In 50 of the 76 Census tracts, there are fewer than 50 people who are “linguistically isolated” (i.e. speaking English less than “very well”). In another 8 tracts, there are between 50 and 100 linguistically isolated individuals. The LEP guidance from DOT indicates lower requirements for recipients that serve LEP populations of 50 or fewer individuals. Almost all of the tracts in the core communities served by GMT with local bus

service have more than 100 LEP individuals; tracts 24 (western Winooski), 26.01(western Essex Junction) and 3 (Burlington Intervale) have the highest number of LEP individuals, with 619, 467 and 391, respectively. Many of these individuals are refugees from Bhutan and Burma.



The next map shows the concentration of linguistically isolated (LI) individuals; that is, tracts where the percentage of these individuals is higher than the service-area-wide average of 2.0%. In tracts 24 and 25.01, comprising most of Winooski, the percentages of LI individuals are 19% and 11%, respectively. From both of these maps, it is clear that LEP efforts need to focus on the Burlington and Winooski, with parts of Essex Junction and South Burlington also important.



The next step in the analysis was to consider specific language groups and where there are concentrations of individuals who do not speak English well. The single largest group of individuals were speakers of Other Indo-European languages, with 1,473 people, reflecting the arrival of Bhutanese refugees in Burlington from 2008 to 2018. The next largest number of these LEP individuals, with 1,180, speak French reflecting longstanding influence from Quebec in northern Vermont as well as recent refugees from Democratic Republic of Congo. Four language groups have between 500 and 600 speakers: Spanish, Russian/Polish/Other Slavic, Chinese, and Other Asian/Pacific Island (mainly reflecting immigrants from Burma). Some of these populations reflect refugee arrivals over the past decade and beyond. The table on the next page shows the sources of refugees each year that were settled in Vermont by the U.S. Committee for Refugees and Immigrants – Vermont (USCRI Vermont, formerly the Vermont Refugee Resettlement Program) or by the Ethiopian Community Development Council, which is based in Brattleboro. It is noteworthy that the influx of refugees to Vermont slowed dramatically from 2018 through 2021, before rising dramatically in 2022.

The maps on the pages following the table display the number of persons who speak English “less than very well” among each of these six languages or language groups plus three additional languages with between 70 and 160 LEP individuals: Vietnamese, Korean and Arabic. Among all of these languages, the ones spoken by recent immigrants tend to be the most geographically concentrated, while French and Spanish speakers are the most widely distributed among the census tracts in the four-county service area. The most concentrated is the group of Other Indo-European Language speakers, the Bhutanese immigrants who, as shown in the first map, are located almost exclusively in the Intervale and Old North End portions of Burlington, in Winooski and in the western part of Essex Junction.

The City of Burlington has a long history of a local French-speaking population, with many French-language schools and churches thriving during the 20th Century, but the Quebecois influence had mostly disappeared by 2015. In the intervening years, the number of French-speaking people in Burlington and surrounding areas has increased, likely due to the influx of French-speaking immigrants and refugees. Five tracts in Burlington collectively have 327 French speakers who speak English less than very well. South Burlington, Williston and Colchester have another 340 such individuals. The southern part of Barre Town has 143 LEP French speakers according to the Census data. Smaller numbers are spread across Franklin County and elsewhere.

Spanish speakers are concentrated in portions of Burlington, but there is a cluster in the tract covering Fairfield and Bakersfield and a concentration in western Essex Junction. Smaller numbers are spread across a dozen other tracts.

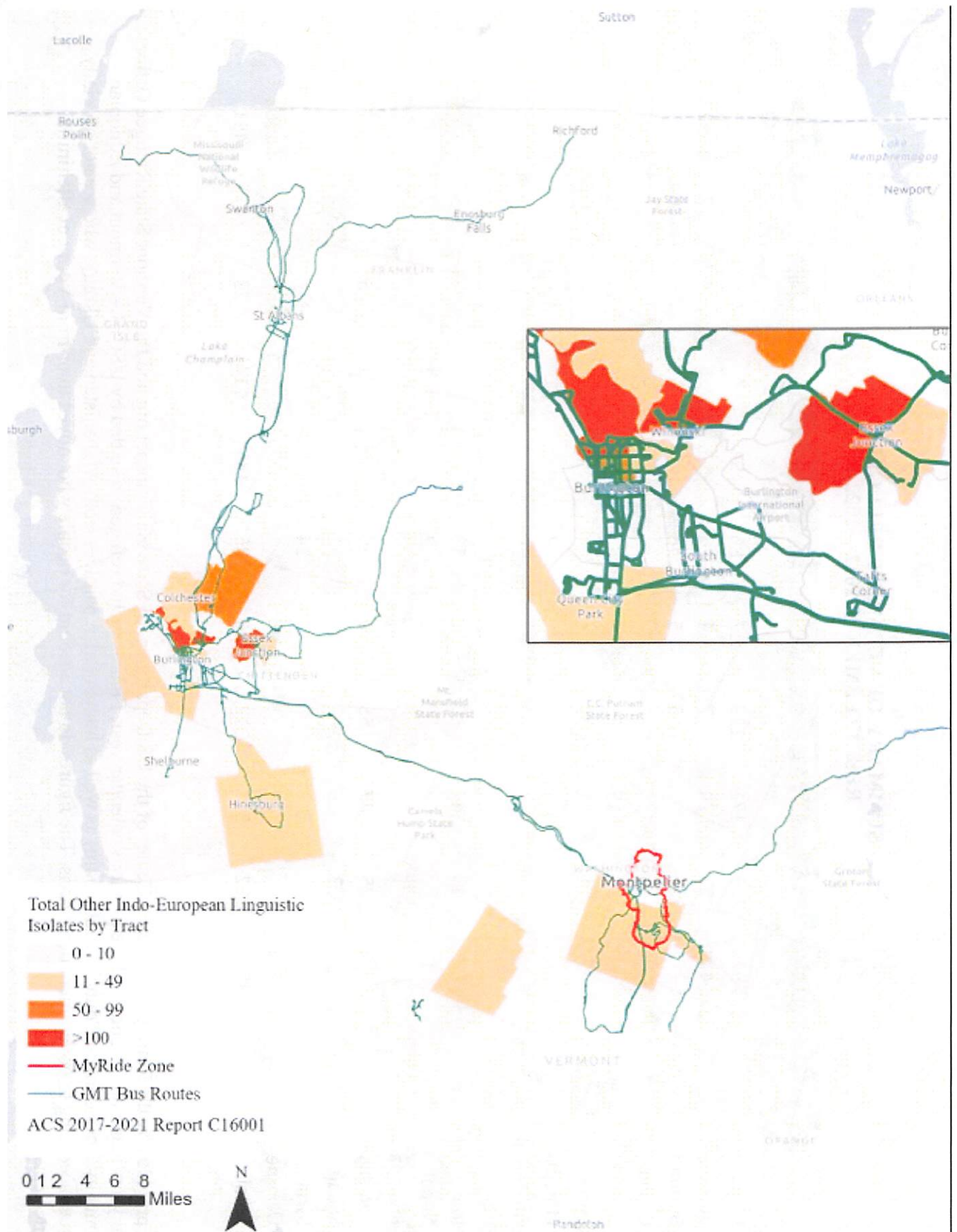
Russian/Polish/Other Slavic speakers reflect refugees from Bosnia who arrived prior to 2012. These Serbo-Croatian speakers are concentrated in the New North End, with smaller numbers in Colchester and South Burlington. Most of the Chinese speakers are in the northern part of Williston and the Route 116 corridor in South Burlington, followed by some downtown neighborhoods of Burlington. Finally, the Other Asian and Pacific Island (Burmese) speakers have settled in the western part of Winooski and the Dorset Street corridor in South Burlington, with smaller numbers elsewhere.

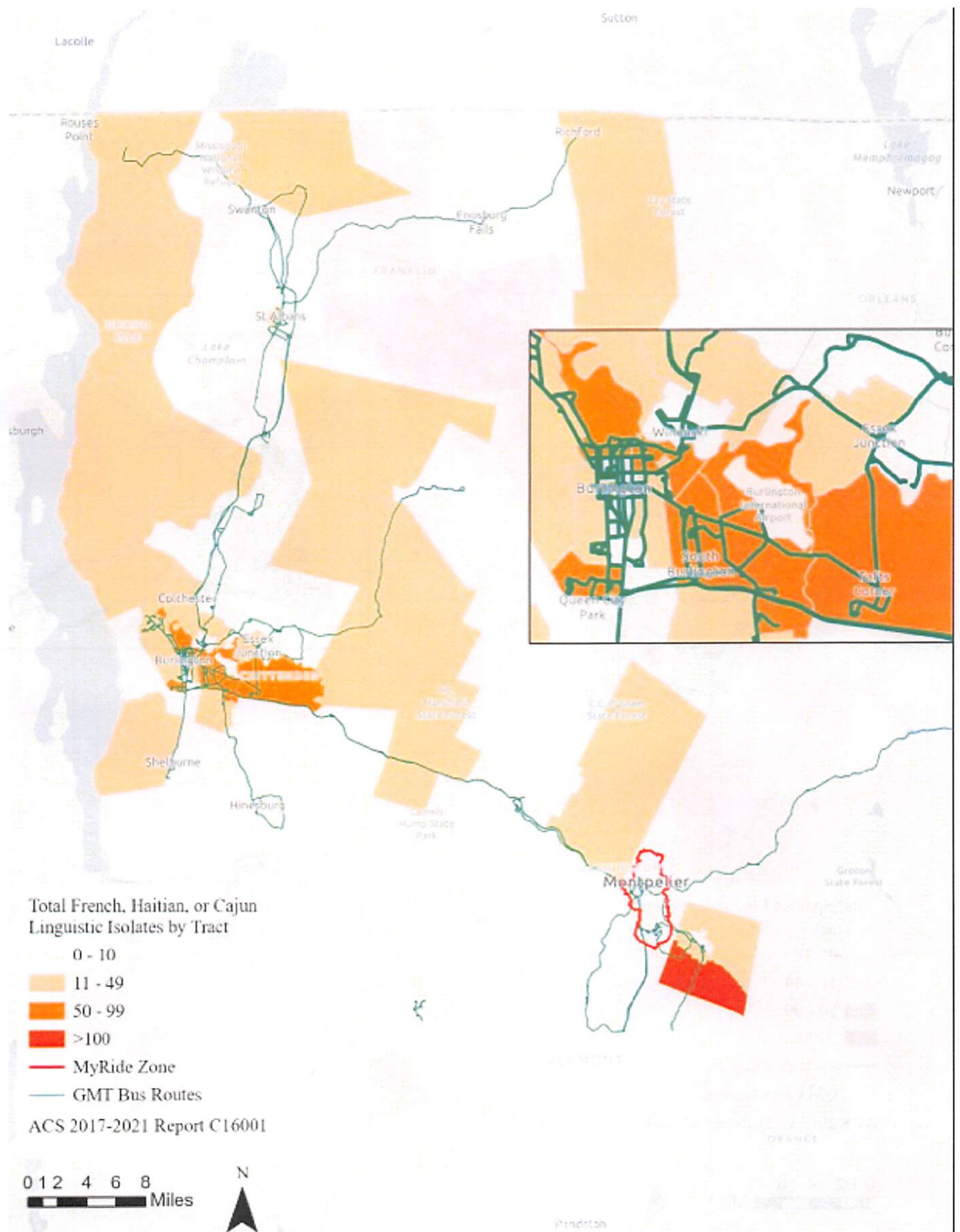
The final three maps have lower numbers overall and show greater concentration. Vietnamese speakers are located in only four tracts in Burlington, Essex Junction and Winooski. Korean immigrants are spread more widely across the GMT region, but still are found in only six tracts. Finally, Arabic speakers can be found in four tracts, but these are all in the center of Chittenden County.

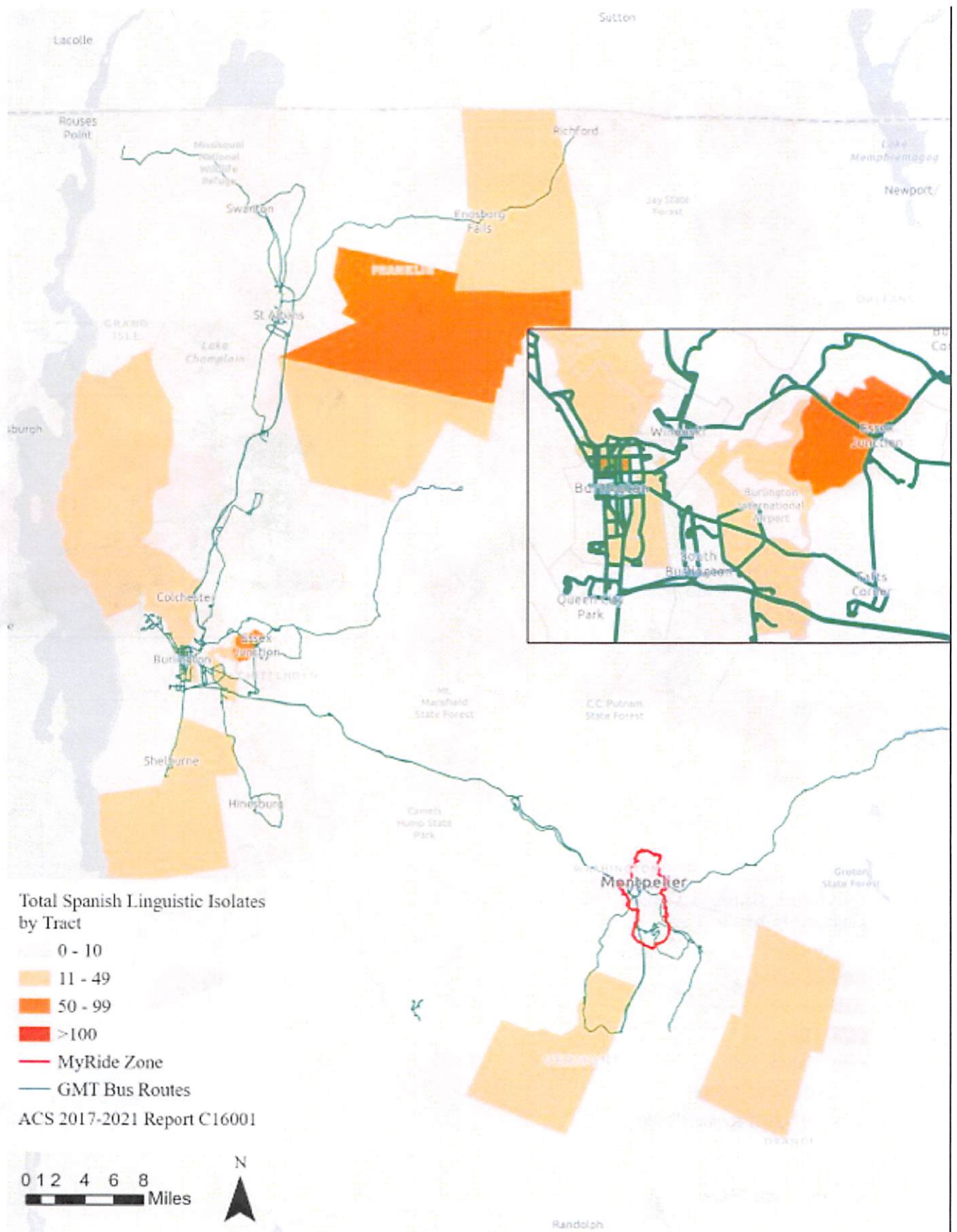
**SUMMARY OF VERMONT REFUGEE
RESETTLEMENTS 2012 – 2022**

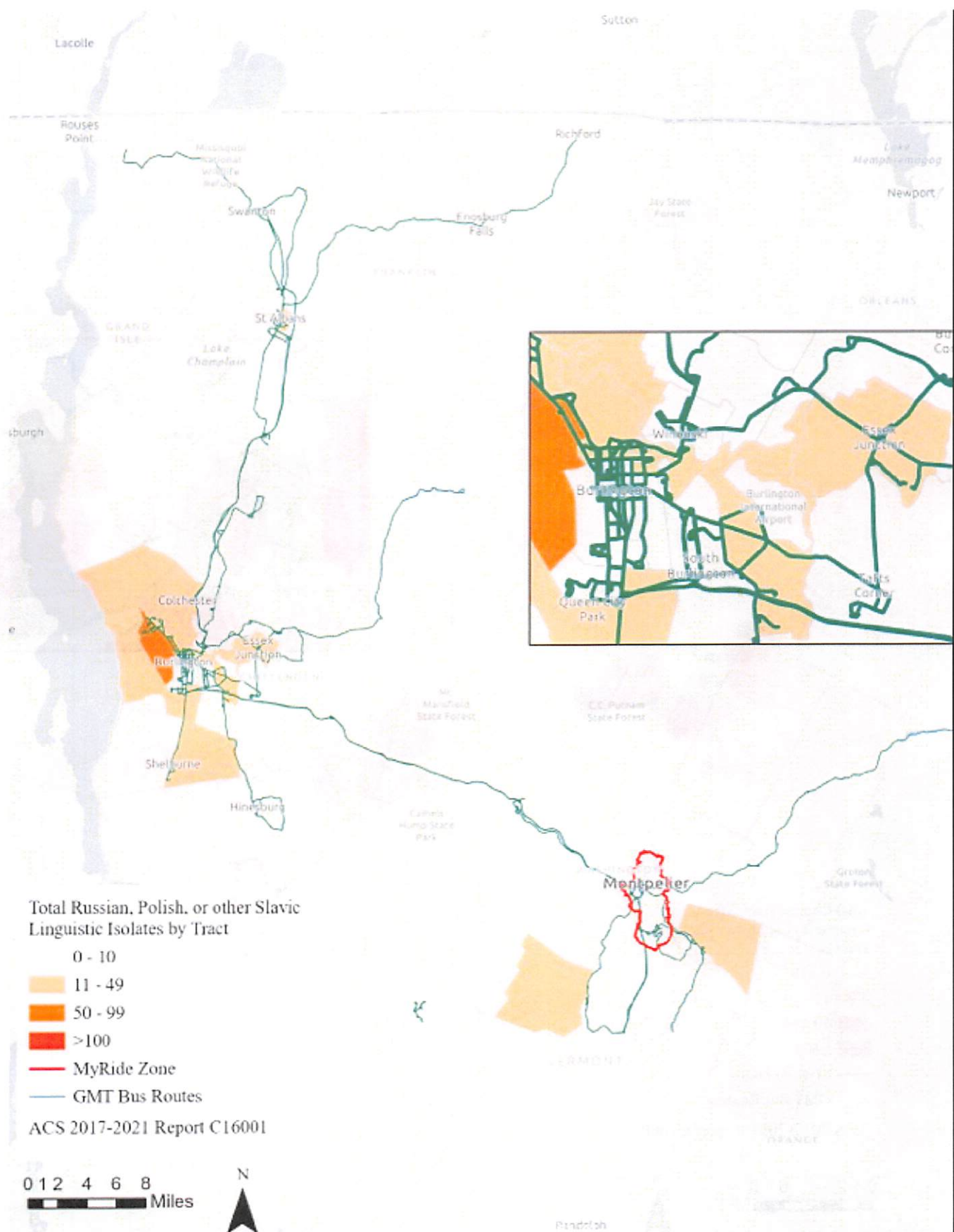
Country \ FFY	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
Afghanistan											269
Bhutan	297	256	171	189	217	86	54				
Burma	42	17	24	7	4	5	3	15	4	2	2
Burundi				6	5	48		8		6	
Congo				1							
Dem. Rep. Congo		1	15	31	75		76	89	14	31	42
Eritrea		1	1								
Ethiopia						2					
Guatemala											3
Iran					3						
Iraq	10	18	47	20	1	18				5	
Nepal	1		2	3	1	2		1		3	
Rwanda		1									
Somalia		25	47	55	80	59		1	5		2
Sudan		3	10			1					33
Syria						14					
Ukraine											100
Total	350	322	317	312	386	235	133	114	23	47	451

Data provided by the Refugee Processing Center of the US Department of State via wrapsnet.org and the Vermont State Refugee Office. Fiscal years begin on October 1 of the previous calendar year. Figures include refugees resettled by USCRI – Vermont and Ethiopian Community Development Council (Brattleboro) as well as humanitarian parolees from Afghanistan and Ukraine who are not officially refugees according to government definitions. The figures do not account for people who moved to or from Vermont after initial resettlement.









**Total Russian, Polish, or other Slavic
Linguistic Isolates by Tract**

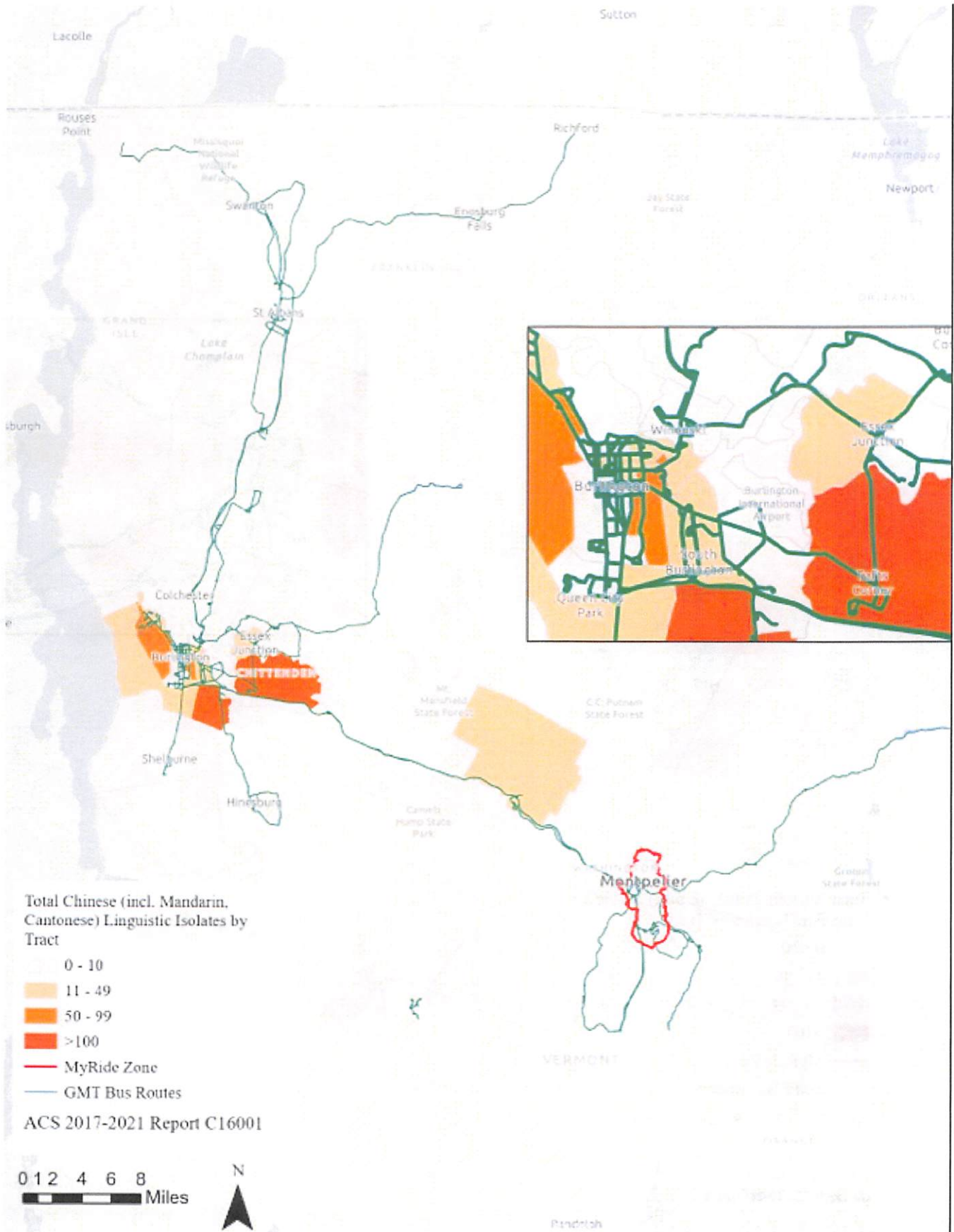
- 0 - 10
- 11 - 49
- 50 - 99
- >100

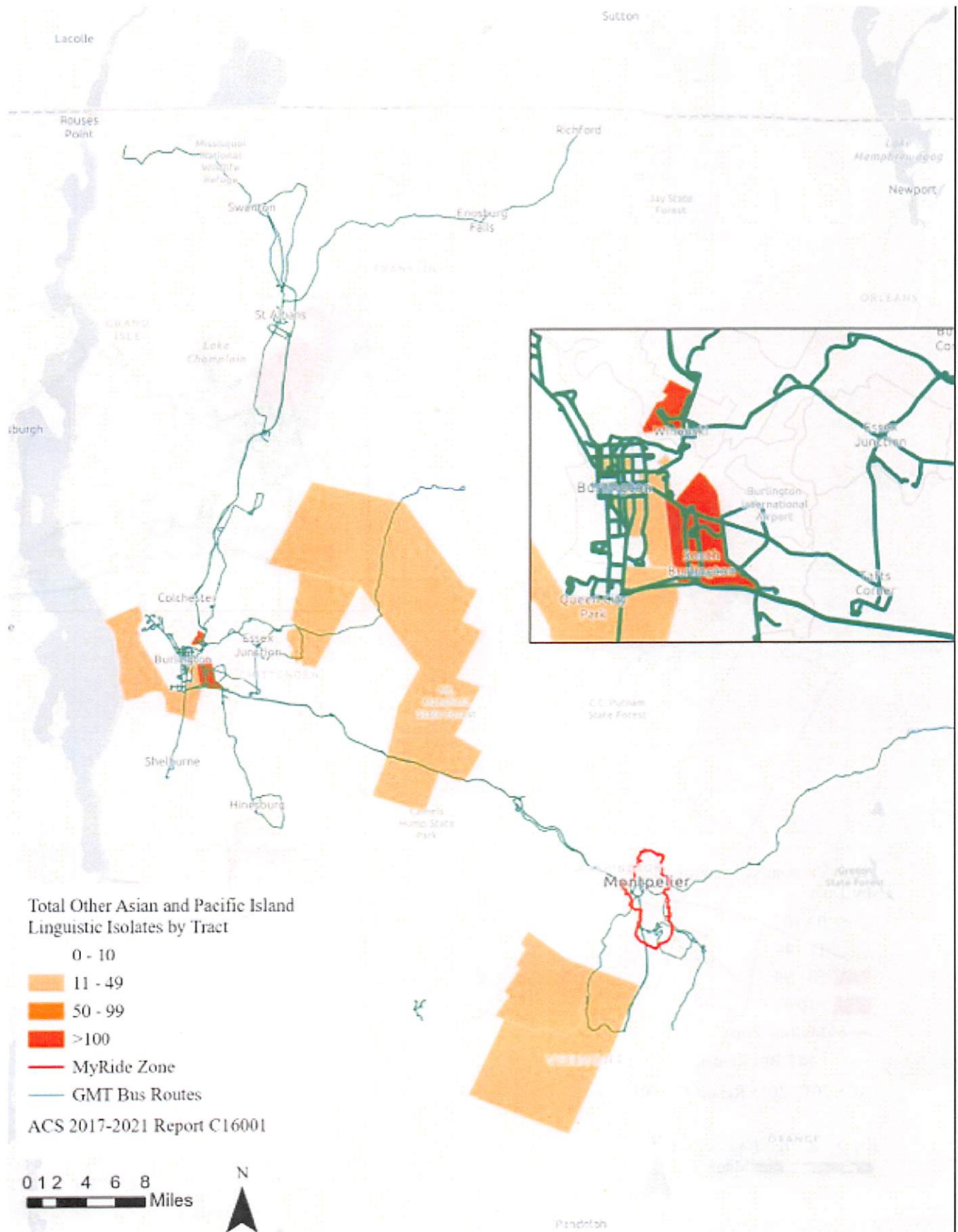
- MyRide Zone
- GMT Bus Routes

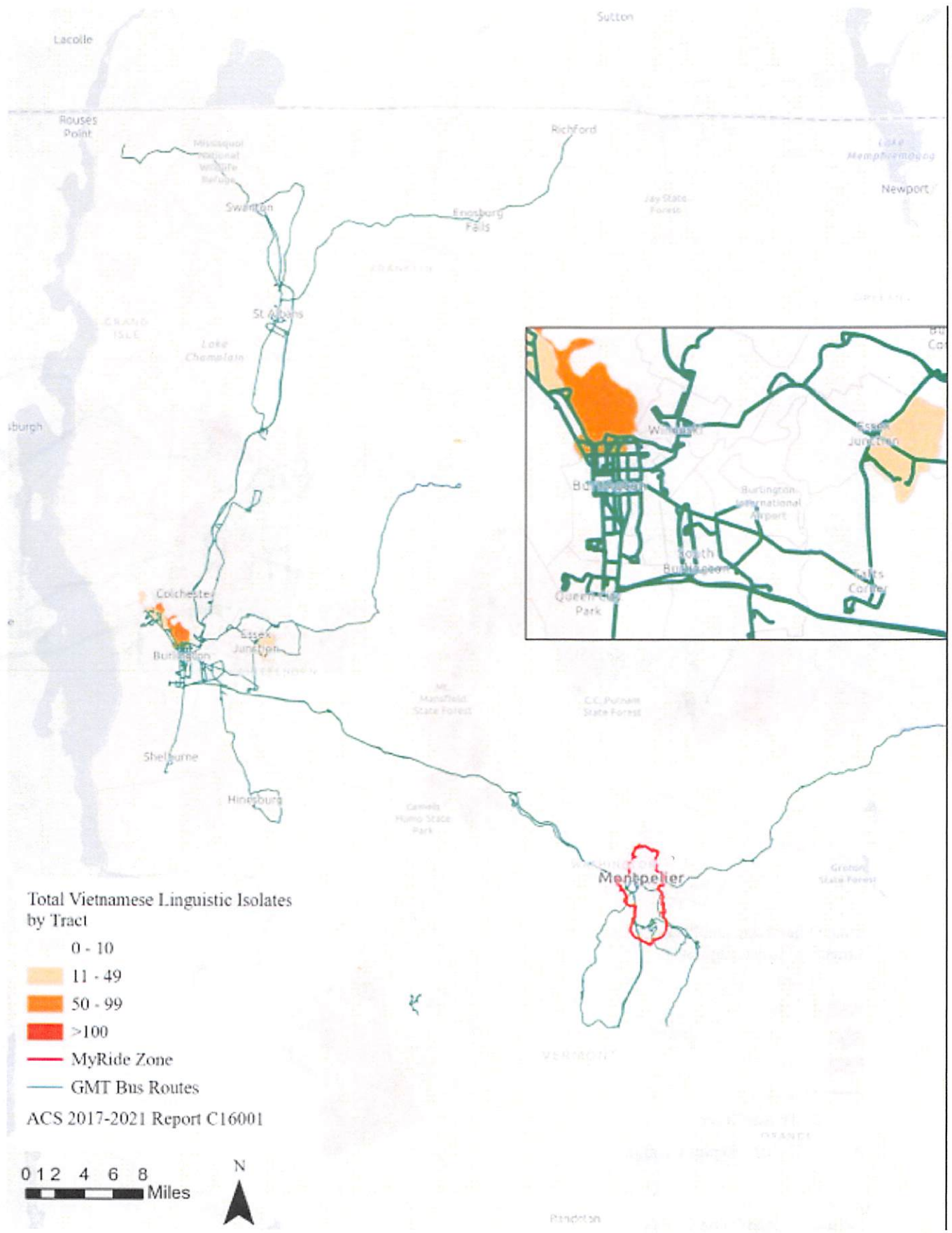
ACS 2017-2021 Report C16001

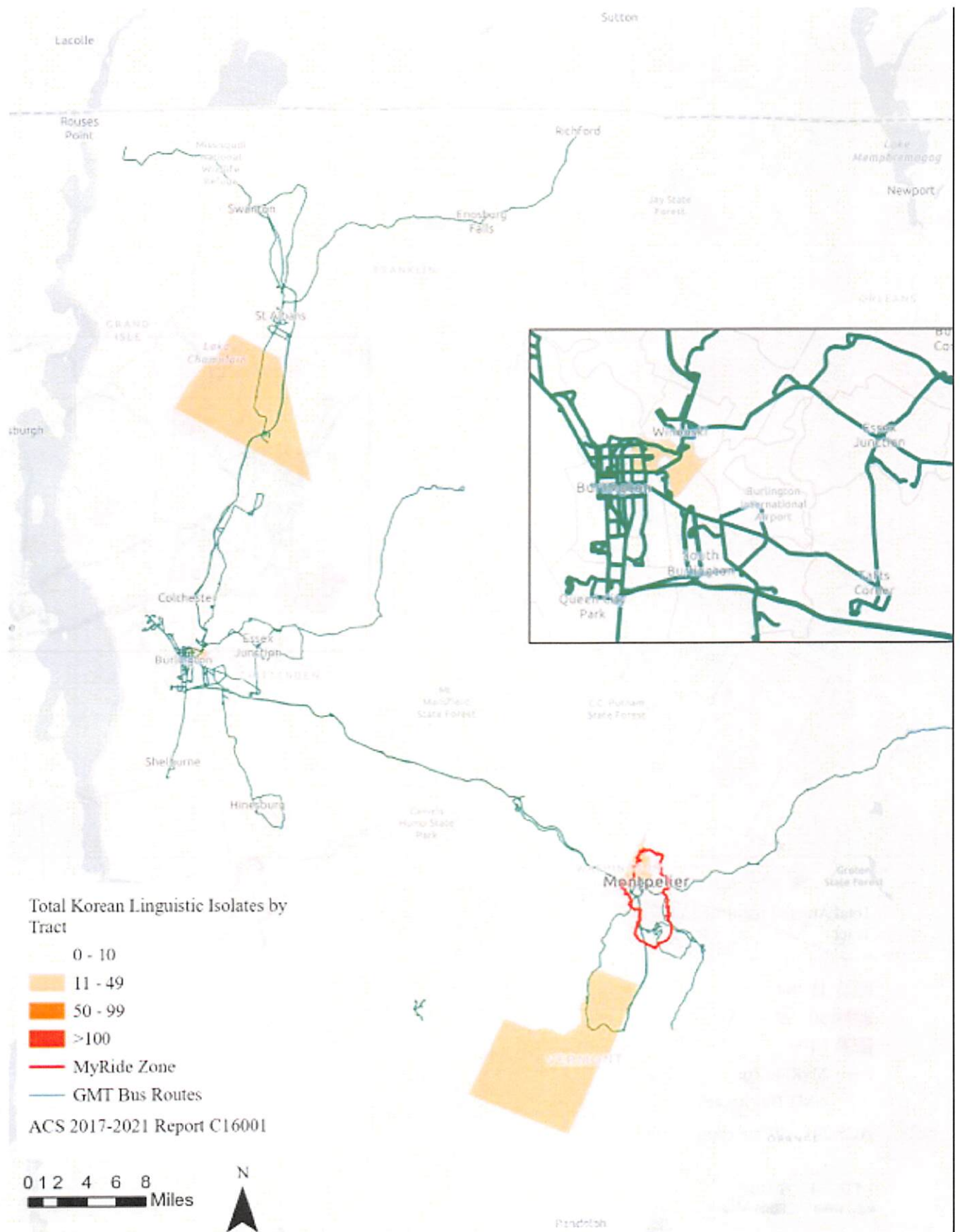
0 1 2 4 6 8
Miles

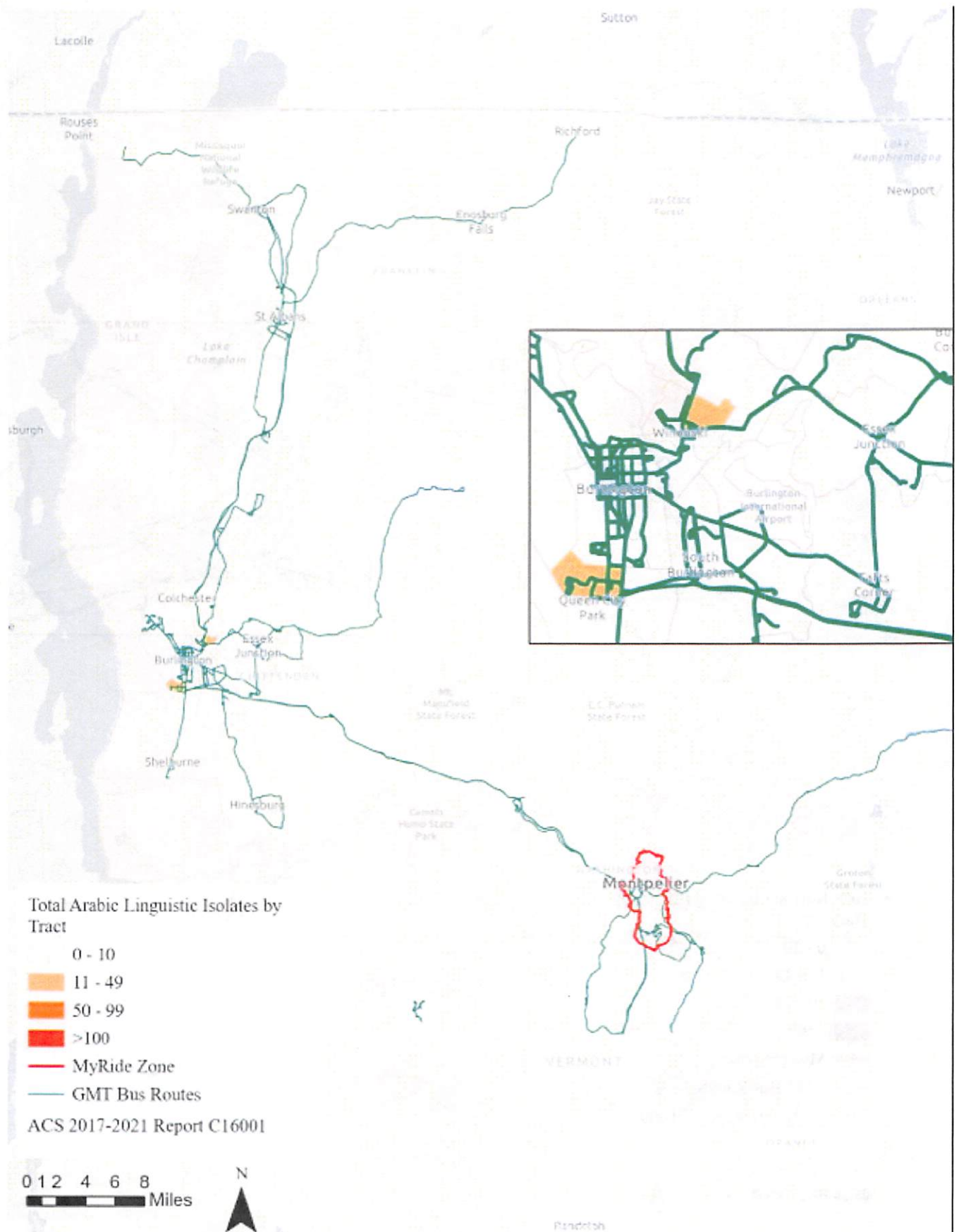




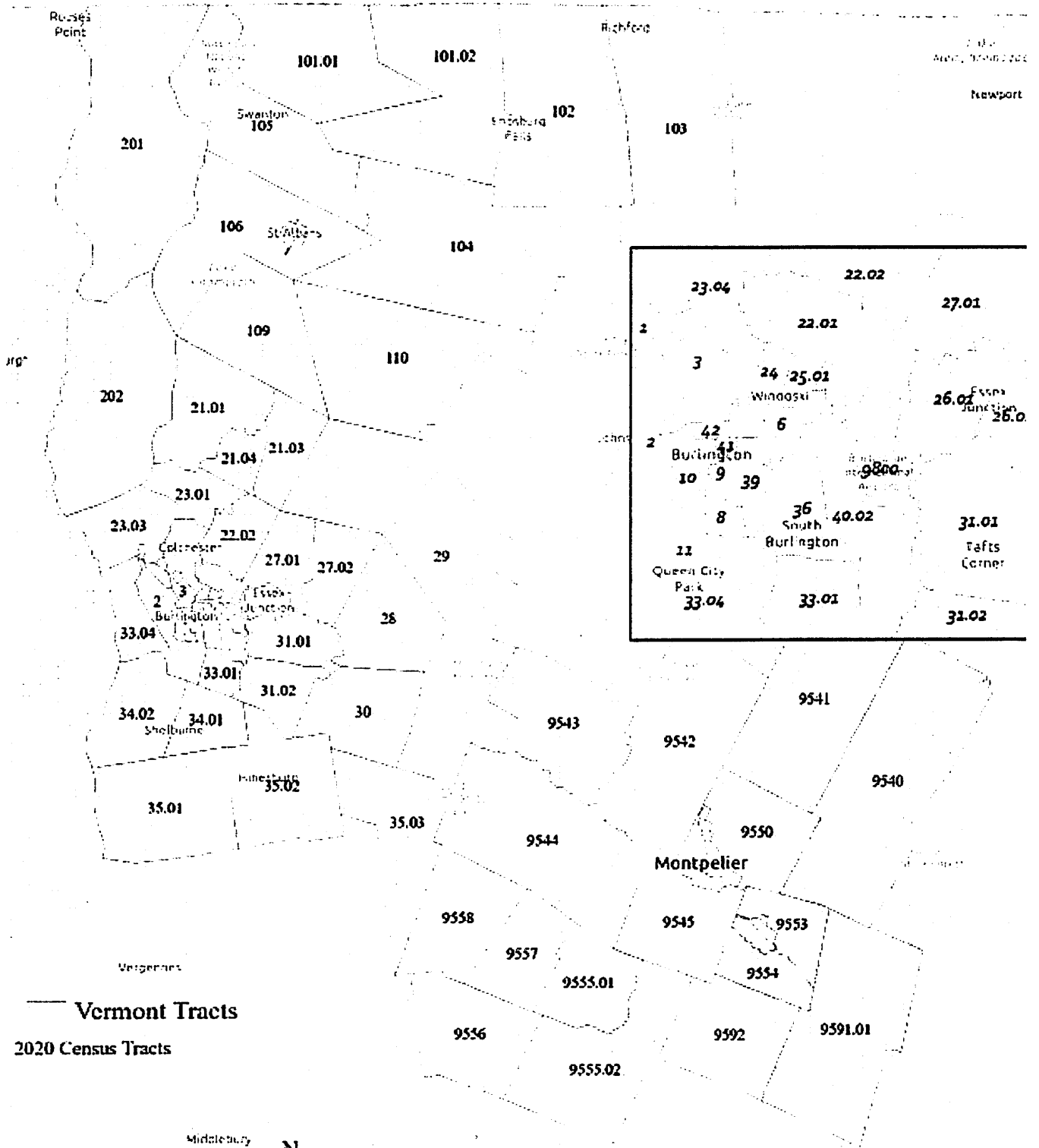








Localle



— Vermont Tracts
 — 2020 Census Tracts

0 2 4 8 12
 Miles



Number of Individuals Who Speak English Less than Very Well by Language and Tract

County	Tract	Description	Total	Russian/ Other			Other Asian					Other and		Total Linguistic Isolates
				Polish/ Slavic	Indo-European	Korean	Chinese	Vietnamese	Island	Arabic	Unspecified			
Chittenden	1	Burlington New North End East	4,366	0	48	43	4	0	14	20	0	6	109	244
Chittenden	2	Burlington New North End West	5,345	0	44	94	0	0	53	0	0	0	0	191
Chittenden	3	Burlington Intervale	4,854	19	65	20	179	0	0	88	0	0	20	391
Chittenden	6	Burlington Northeast	4,319	0	81	36	18	35	41	0	0	0	68	279
Chittenden	8	Burlington South Central	2,488	32	7	0	0	0	0	0	0	0	0	39
Chittenden	9	Burlington Maple St	2,517	1	4	0	0	0	0	0	49	0	0	54
Chittenden	10	Burlington Downtown/Waterfront	2,346	1	26	0	0	0	0	0	0	0	0	27
Chittenden	11	Burlington South End	2,128	0	89	0	0	0	0	0	0	42	35	166
Chittenden	21.01	Milton West	2,713	0	12	0	0	0	0	0	0	0	0	12
Chittenden	21.03	Milton East	3,817	0	0	0	0	0	0	0	0	0	0	0
Chittenden	21.04	Milton Southwest	3,583	0	0	0	0	0	0	0	0	0	0	0
Chittenden	22.01	Colchester South	3,141	7	35	0	0	0	0	0	0	0	0	42
Chittenden	22.02	Colchester Northeast	4,606	0	0	0	75	0	0	0	0	0	0	75
Chittenden	23.01	Colchester North	1,355	0	0	0	0	0	0	0	0	0	0	0
Chittenden	23.03	Colchester Northwest	4,637	14	40	44	0	0	0	0	0	0	0	98
Chittenden	23.04	Colchester Village	2,965	13	42	43	23	0	0	0	0	0	0	121
Chittenden	24	Winooski West	3,232	1	0	0	367	0	0	0	198	0	53	619
Chittenden	25.01	Winooski East	2,235	0	0	0	223	0	0	0	0	22	0	245
Chittenden	25.02	Winooski South	2,169	0	0	0	0	0	0	4	0	0	0	4
Chittenden	26.01	Essex Junction West	5,641	62	19	31	327	0	28	0	0	0	0	467
Chittenden	26.02	Essex Junction East	4,145	0	0	37	23	0	0	42	0	3	14	119
Chittenden	27.01	Essex Town West	5,824	0	0	0	0	0	0	0	0	0	48	48
Chittenden	27.02	Essex Town East	5,183	9	0	6	10	0	0	0	33	0	0	58
Chittenden	28	Jericho	4,758	0	12	0	0	0	0	0	0	0	0	12
Chittenden	29	Westford, Underhill, Bolton	6,299	0	18	0	0	0	0	0	13	0	0	34
Chittenden	30	Richmond	3,917	0	0	0	0	0	0	0	0	0	0	0
Chittenden	31.01	Williston North	7,633	4	84	0	0	0	112	0	0	0	0	200
Chittenden	31.02	Williston South	1,948	0	0	0	0	0	0	0	0	0	0	0
Chittenden	33.01	South Burlington 116	4,248	8	13	0	0	0	101	0	9	0	0	140
Chittenden	33.04	South Burlington US 7	6,238	8	0	23	41	0	23	0	20	0	0	115
Chittenden	34.01	Shelburne East	5,091	19	0	15	0	0	0	0	0	0	0	34
Chittenden	34.02	Shelburne West	2,283	0	17	0	0	0	0	0	0	0	0	17
Chittenden	35.01	Charlotte	3,703	24	0	0	0	0	0	0	0	0	0	24
Chittenden	35.02	Hinesburg, St. George	5,119	0	0	0	12	0	0	0	0	0	0	12
Chittenden	35.03	Huntington, Buels Gore	1,732	0	4	0	0	0	0	0	4	0	0	8
Chittenden	36	South Burlington Dorset	4,711	0	53	0	0	0	19	0	169	0	0	241
Chittenden	39	Burlington UVM	7,695	31	14	0	2	0	88	0	14	0	0	152
Chittenden	40.02	South Burlington East	3,965	20	87	49	0	0	0	0	0	0	0	156
Chittenden	41	Burlington Main to Pearl Central	2,672	0	9	0	58	0	29	0	0	0	0	96
Chittenden	42	Burlington ONE	4,322	72	0	9	58	0	47	0	11	0	0	197
Franklin	101.01	Highgate	3,335	0	13	0	0	0	0	0	0	0	0	13
Franklin	101.02	Franklin, Sheldon	3,377	0	0	0	0	0	3	0	0	0	0	3
Franklin	102	Berkshire, Enosburg	3,937	12	6	0	0	0	0	0	0	0	0	18
Franklin	103	Richford, Montgomery	3,354	0	23	0	0	1	0	0	0	0	0	24
Franklin	104	Fairfield, Bakersfield	3,382	70	4	0	10	0	0	0	0	0	0	84
Franklin	105	Swanton	6,338	0	0	0	0	0	0	0	0	0	0	4
Franklin	106	St. Albans Town	6,419	0	0	0	0	0	0	0	0	0	0	0
Franklin	107	St. Albans West	3,318	0	33	0	0	0	0	0	0	0	0	33
Franklin	108	St. Albans East	3,125	0	0	15	0	0	0	0	0	0	0	15
Franklin	109	Georgia	4,602	0	0	0	0	24	0	0	0	0	0	24
Franklin	110	Fairfax, Fletcher	5,708	11	13	0	0	0	0	0	0	0	0	34
Grand Isle	201	North Hero, Alburgh, Isle La Motte	3,374	6	17	0	0	0	8	0	0	0	0	31
Grand Isle	202	South Hero, Grand Isle	3,559	20	14	0	0	0	0	0	0	0	0	34
Orange	9591.01	Orange, Washington	1,963	15	0	0	0	0	0	0	0	0	0	15
Orange	9592	Williamstown	3,421	3	0	0	0	0	0	0	0	0	0	3
Washington	9540	Cabot, Marshfield, Plainfield	4,467	4	4	0	0	0	0	0	3	0	0	14
Washington	9541	Woodbury, Calais	2,545	0	0	0	0	0	0	0	3	0	0	3
Washington	9542	Worcester, Middlesex	2,692	10	12	0	0	0	0	0	0	0	0	22
Washington	9543	Waterbury	4,845	0	0	0	0	0	17	0	0	0	0	17
Washington	9544	Duxbury, Moretown	2,820	0	0	0	0	0	0	0	0	0	0	0
Washington	9545	Berlin	2,633	0	9	0	12	0	0	0	0	0	0	21
Washington	9546	Montpelier Northwest	2,062	0	0	0	0	11	0	0	0	0	0	11
Washington	9547	Montpelier Northeast	1,686	6	0	7	0	9	0	0	0	0	0	22
Washington	9548	Montpelier Downtown	2,122	0	0	0	0	0	0	0	0	0	0	0
Washington	9549	Montpelier South	1,901	0	0	0	0	0	0	0	0	0	0	0
Washington	9550	East Montpelier	2,391	0	7	0	0	0	0	0	0	0	0	7
Washington	9551	Barre City North	4,359	0	0	14	0	0	0	0	0	0	0	14
Washington	9552	Barre City South	3,791	0	18	0	13	0	0	0	0	0	0	31
Washington	9553	Barre Town North	3,818	0	33	17	0	0	0	0	0	0	0	50
Washington	9554	Barre Town South	3,792	0	143	0	0	0	0	0	0	0	0	143
Washington	9555.01	Northfield West	2,257	0	4	15	0	0	0	0	17	0	0	36
Washington	9555.02	Northfield Southeast	4,651	17	4	0	5	22	9	0	25	0	0	82
Washington	9556	Warren	1,571	0	0	0	0	0	0	0	0	0	0	20
Washington	9557	Waitsfield	1,634	0	0	0	13	0	0	0	0	0	0	13
Washington	9558	Fayston	933	0	0	0	0	0	0	0	0	0	0	0
			276,125	519	1180	518	1473	102	592	154	568	73	347	5578

Percentage of Population that Speaks English Less than Very Well by Language and Tract

County	Tract	Description	Spanish	French	German	Russian/ Polish/ Slavic	Other Indo- European	Korean	Chinese	Vietnames e	Tagalog	Other Asian and Pacific Island	Arabic	Other and Unspecified
Chittenden	1	Burlington New North End East		1.1%		1.0%	0.1%		0.3%	0.5%		0.1%	2.5%	
Chittenden	2	Burlington New North End West		0.8%		1.8%			1.0%					
Chittenden	3	Burlington Intervale	0.4%	1.3%		0.4%	3.7%			1.8%			0.4%	
Chittenden	6	Burlington Northeast		1.9%		0.8%	0.4%	0.8%	0.9%				1.6%	
Chittenden	8	Burlington South Central	1.3%	0.3%										
Chittenden	9	Burlington Maple St	0.0%	0.2%							1.9%			
Chittenden	10	Burlington Downtown/Waterfront	0.0%	1.1%										
Chittenden	11	Burlington South End		4.2%								2.0%	1.6%	
Chittenden	21.01	Milton West		0.4%										
Chittenden	21.03	Milton East												
Chittenden	21.04	Milton Southwest												
Chittenden	22.01	Colchester South	0.2%	1.1%										
Chittenden	22.02	Colchester Northeast					1.6%							
Chittenden	23.01	Colchester North												
Chittenden	23.03	Colchester Northwest	0.3%	0.9%		0.9%								
Chittenden	23.04	Colchester Vilalge	0.4%	1.4%		1.5%	0.8%							
Chittenden	24	Winooski West	0.0%				11.4%				6.1%		1.6%	
Chittenden	25.01	Winooski East					10.0%					1.0%		
Chittenden	25.02	Winooski South							0.2%					
Chittenden	26.01	Essex Junction West	1.1%	0.3%		0.5%	5.8%	0.5%						
Chittenden	26.02	Essex Junction East				0.9%	0.6%		1.0%			0.1%	0.3%	
Chittenden	27.01	Essex Town West											0.8%	
Chittenden	27.02	Essex Town East	0.2%			0.1%	0.2%				0.6%			
Chittenden	28	Jericho		0.3%										
Chittenden	29	Westford, Underhill, Bolton		0.3%	0.0%						0.2%			
Chittenden	30	Richmond												
Chittenden	31.01	Williston North	0.1%	1.1%					1.5%					
Chittenden	31.02	Williston South												
Chittenden	33.01	South Burlington 116	0.2%	0.3%	0.2%				2.4%		0.2%			
Chittenden	33.04	South Burlington US 7	0.1%			0.4%	0.7%	0.4%			0.3%			
Chittenden	34.01	Shelburne East	0.4%			0.3%								
Chittenden	34.02	Shelburne West		0.7%										
Chittenden	35.01	Charlotte	0.6%											
Chittenden	35.02	Hinesburg, St. George					0.2%							
Chittenden	35.03	Huntington, Buels Gore		0.2%							0.2%			
Chittenden	36	South Burlington Dorset		1.1%					0.4%		3.6%			
Chittenden	39	Burlington UVM	0.4%	0.2%	0.0%		0.0%		1.1%		0.2%			
Chittenden	40.02	South Burlington East	0.5%	2.2%		1.2%								
Chittenden	41	Burlington Main to Pearl Central		0.3%			2.2%		1.1%					
Chittenden	42	Burlington ONE	1.7%			0.2%	1.3%		1.1%		0.3%			
Franklin	101.01	Highgate		0.4%										
Franklin	101.02	Franklin, Sheldon							0.1%					
Franklin	102	Berkshire, Enosburg	0.3%	0.2%										
Franklin	103	Richford, Montgomery		0.7%				0.0%						
Franklin	104	Fairfield, Bakersfield	2.1%	0.1%			0.3%							
Franklin	105	Swanton			0.1%									
Franklin	106	St. Albans Town												
Franklin	107	St. Albans West		1.0%										
Franklin	108	St. Albans East				0.5%								
Franklin	109	Georgia						0.5%						
Franklin	110	Fairfax, Fletcher	0.2%	0.2%	0.2%									
Grand Isle	201	North Hero, Alburgh, Isle La Motte	0.2%	0.5%				0.2%						
Grand Isle	202	South Hero, Grand Isle	0.6%	0.4%										
Orange	9591.01	Orange, Washington	0.8%											
Orange	9592	Williamstown	0.1%											
Washington	9540	Cabot, Marshfield, Plainfield	0.1%	0.1%						0.1%	0.1%			
Washington	9541	Woodbury, Calais										0.1%		
Washington	9542	Worcester, Middlesex	0.4%	0.4%										
Washington	9543	Waterbury						0.4%						
Washington	9544	Duxbury, Moretown												
Washington	9545	Berlin		0.3%			0.5%							
Washington	9546	Montpelier Northwest						0.5%						
Washington	9547	Montpelier Northeast	0.4%			0.4%		0.5%						
Washington	9548	Montpelier Downtown												
Washington	9549	Montpelier South												
Washington	9550	East Montpelier		0.3%										
Washington	9551	Barre City North				0.3%								
Washington	9552	Barre City South		0.5%			0.3%							
Washington	9553	Barre Town North		0.9%		0.4%								
Washington	9554	Barre Town South		3.8%										
Washington	9555.01	Northfield West		0.2%		0.7%					0.8%			
Washington	9555.02	Northfield Southeast	0.4%	0.1%			0.1%	0.5%	0.2%		0.5%			
Washington	9556	Warren			1.3%									
Washington	9557	Waitsfield					0.8%							
Washington	9558	Fayston												

Source: 2017-2021 American Community Survey

It can be seen in the data table that follows the maps that two language groups surpass 1,000 individuals for the entire service region and that no tract surpasses 620 individuals who cannot speak English very well for all languages combined. For individual languages, four tracts have percentages exceeding 5% of the population: Tract 1 (Burlington New North End East) for Other Indo-European and Other Asian languages, and Tract 2 (Burlington New North End West) and Tract 8 (South Central Burlington) for Other Indo-European languages. GMT provides oral translation services to these populations on request. A map showing the tract numbers and how they relate to municipal boundaries is provided for reference just prior to the tables.

Factor 2 – Frequency of Contact with LEP Persons

LEP individuals, in general, depend much more on public transportation than those who are English proficient, thus the need for LEP individuals to use GMT services on a daily basis is frequent. Many of the social service agencies that serve immigrants and refugees—who are most likely to be LEP—help LEP individuals and refugees in their navigation of GMT’s bus system.

The forms of LEP interaction experienced by GMT include the following:

- Providing basic information on how to use public transit services in the area
- Purchasing fare media (though not since March 2020)
- Handling passenger complaints
- Gathering data such as on-board customer surveys.

GMT gauges the frequency of contact with LEP persons by periodically surveying its employees, including drivers, dispatchers, kiosk staff at the downtown transit station, and front desk and receptionist personnel at GMT offices. A survey taken in April 2023 included all of GMT’s front-line staff who interact with passengers most frequently (GMT front desk, customer service representative at the kiosk at the Downtown Transit Center, supervisors and trip planners) and operators from each of GMT’s divisions. There were a total of 41 responses. The survey found the following results:

- Only 20% of respondents said they rarely or never had interactions with LEP individuals while 24% had interactions at least three times per week.
- Most drivers did not know which languages the LEP individuals spoke, but those who responded cited Spanish, Nepali and French most commonly, with a few mentions of Russian, Ukrainian, Arabic, Somali, Portuguese, Vietnamese, Chinese and Serbo-Croatian.
- Nearly every interaction involved questions about how to use the bus system and another 15% were questions regarding SSTA or other forms of public transit. About 8% were questions not related to the bus system and 12% related to fares (or the lack of fares).
- Almost two thirds of respondents felt that they were able to convey the desired information very well or pretty well, while only 5% felt they were unable to convey the information. The other respondents said that it varied, depending on the customer.
- Only 26% of respondents were aware of the availability of real-time translation services by telephone, but most of these said that using a telephone translation service would take too long. Some used Google translate on their smartphone.

- With regard to the trend in interactions with LEP individuals, 33% of respondents said that it seems like there are more people who don't speak English well compared to a few years ago. Only 21% said it seemed like there were fewer interactions with LEP individuals, and 46% said it seemed about the same.

Given the indication that there are a substantial number of interactions with LEP individuals, and that these interactions seem to be stable or increasing, GMT will monitor these interactions and determine if further action is necessary. Next steps could include additional training for GMT staff, making sure that all staff is aware of real-time translations services, stocking the Downtown Transit Center kiosk and buses with cards that provide information, asking staff who interact with LEP persons to gather more detailed information about what languages those persons speak, and then providing translations of key information in the languages most frequently encountered. The kiosk already has an I Speak card with over 20 languages listed so that the customer service representative there can make use of telephone translation services effectively.

Factor 3 – Importance of GMT Activities and Services to LEP Persons

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

When refugees are resettled in Burlington through USCRI Vermont, for example, GMT works with the agency to assist the LEP individuals to learn the GMT bus system. Experience has shown that after just one or two rides, these individuals appear to have no further problems in getting to any desired location in the core of Chittenden County.

Denial or delay of access to GMT services to LEP individuals has never been a problem in its service area. GMT's urban system is designed with the Downtown Transit Center serving as the main hub. Almost all of GMT's fixed routes originate there. As mentioned above, GMT will consider providing training to staff at the kiosk at the DTC and materials in selected languages to provide important information about how to use the GMT system. GMT's rural services in Washington County are served by a new hub in downtown Montpelier; similar measures will be taken there as appropriate.

Factor 4 – Resources Available and Cost

Because of the very low incidence of LEP persons in Vermont overall, the cost to accommodate them has not been burdensome. VTrans provides in-person and telephone translation services to VTrans subrecipients through a contract with Telanguage (www.telanguage.com). GMT has explicit access to the Telanguage contract. It is not foreseen that the resources available or the cost of translation services will hinder the accommodation of the needs of GMT's LEP population.

Translation of all of GMT's written materials and/or signs into a variety of languages cannot be justified at this time, as not only are the numbers of the potential benefactors small, but the languages which would require translating into are often changing along with the origin of the refugees settling in its service area. Nonetheless, GMT has translated "How to Ride" guide for LEP populations participating in GMT's nascent travel training program and will continue to implement this upon request.

The MyRide app associated with the pilot microtransit service in Montpelier and Berlin is currently available in both English and French. The vendor has the capacity to accommodate other languages, and GMT will work with the vendor to expand the number of languages as suggested by public requests.

Fortunately, the services offered by many community-based organizations in the GMT service area have proved more than adequate in providing meaningful access to LEP persons utilizing GMT services. Where oral translation has been needed by various refugee populations, this has been provided by USCRI Vermont.

D. Monitoring

GMT has described in previous sections that it is extensively aware of the demographics of its service area, and believes that through the services provided to LEP individuals that the public transportation needs of all individuals in its service area are being met without regard to ability to speak English. The data indicates that at this point in time, GMT does not need to take any further actions to assist LEP individuals.

DOT acknowledges that the implementation of a comprehensive system to serve LEP individuals is a process, and that a system will evolve over time as it is implemented and periodically reevaluated. Recipients are encouraged to document their efforts to provide LEP persons with meaningful access to federally assisted programs and activities.¹

In light of this, GMT will continue to monitor its service population on a triennial basis and will be prepared to implement the appropriate services should that need be assessed. This monitoring process will include the following steps:

- Monitor current LEP populations in its service area using Census data and outreach to State Refugee Office
- Survey its employees to determine the degree of interaction with LEP persons and whether this is increasing,
- Ascertain whether existing procedures are meeting the needs of LEP persons,
- Continue to maintain awareness among management and staff of the regulations implementing Title VI of the Civil Rights Act of 1964, and
- Update the LEP assessment as necessary.

Inclusive Public Participation Plan

Public participation is an essential component of the planning process. From short-term service changes to long-range vision documents and investment strategies, input from the public about policies and services that affect them is critical to their successful implementation. GMT conducts public outreach efforts and public hearings on planning efforts and service changes. Prior to discussing the means of engaging minority and low income communities in these activities, a brief demographic profile of the GMT service area is presented in order to identify locations in the county with concentrations of minority and low-income residents.

¹ DOT Docket OST-2001-8696: Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (Federal Register: December 14, 2005 – Volume 670, Number 239), § VIII.

Demographic Profile

Using the most recent available data from the American Community Survey (2017-2021), GMT produced the summary table below. For each Census tract in the four-county region, the table shows the total population, the non-white/non-Hispanic population, the foreign-born population and the population with incomes below the poverty line.

Minorities

The tracts with the greatest number of minority individuals are located in the center of Chittenden County, in Burlington, Winooski, South Burlington, Williston and Essex Junction. The only tract among the top 18 not located in the urban core is tract 9555.02 in the Roxbury/Northfield portion of Washington County. This central part of Chittenden County has, by far, the highest level of bus service in Vermont. All tracts with at least 500 non-white persons are served by GMT local bus routes (though the Northfield/Roxbury tract has very limited service).

Tracts with percentages of minority individuals higher than the regional average of 10.0% are primarily located in these towns, with the exception of tracts in Berkshire/Enosburg, Montpelier, Waitsfield. Almost all of these tracts with concentrations of minorities have at least some form of bus service, either local or commuter routes.

Non-American National Origin

The incidence of foreign-born individuals is similar to that seen among minorities. Again, tracts containing 500 or more foreign-born individuals are located in Burlington, Essex Junction, Winooski, South Burlington, Williston and Colchester. Among these 14 tracts there are nearly 9,000 people who were not born in the US. All of these tracts are served by GMT bus routes

Concentrations of non-American born residents (percentages higher than the regional average of 5.9%) are in the municipalities just listed, plus Shelburne and Montpelier. The more rural parts of the GMT service area have much lower percentages of foreign-born individuals.

Low Income

As the only urban area in Vermont, even with the large amount of economic activity, there are significant numbers of low income individuals in Chittenden County. In the 2017-2021 American Community Survey data, five tracts in Burlington have more than 1,000 residents with household incomes below the poverty line. (To some extent, this reflects the large number of college students attending UVM and other institutions in Burlington and surrounding communities.) However, poverty is much more widespread throughout the GMT service area than minority status or being foreign born. Tracts in Barre City, Swanton, St. Albans, Enosburg, Northfield, Waterbury and eastern Washington County have more than 500 residents with incomes below the poverty line. As with the two other factors considered above, all of the tracts with the highest numbers of low-income residents have some form of GMT bus service available.

The percentage of low-income residents highlights the focus on tracts in Barre, Burlington, Winooski, St. Albans and Northfield where over 20% of residents live below the poverty line. In the following table, tracts with a concentration of minorities, foreign-born, or low income residents are highlighted with red ink and shading.

Minority, Non-Native and Low Income Population by Census Tract

County	Tract	Town	Total Population	Non-White or Hispanic Population	Pct.	Foreign Born	Pct.	Below Poverty Line	Pct.
Chittenden	1	Burlington New North End East	4,583	914	19.9%	738	16.1%	415	9.1%
Chittenden	2	Burlington New North End West	5,582	691	12.4%	301	5.4%	285	5.4%
Chittenden	3	Burlington Intervale	5,258	1,645	31.3%	741	14.1%	1,372	26.1%
Chittenden	6	Burlington Northeast	4,588	1,018	22.2%	664	14.5%	1,529	34.6%
Chittenden	8	Burlington South Central	2,570	79	3.1%	115	4.5%	303	11.8%
Chittenden	9	Burlington Maple St	2,595	205	7.9%	76	2.9%	458	21.7%
Chittenden	10	Burlington Downtown/Waterfront	2,418	286	11.8%	228	9.4%	390	16.8%
Chittenden	11	Burlington South End	2,191	208	9.5%	141	6.4%	149	6.8%
Chittenden	21.01	Milton West	2,923	87	3.0%	71	2.4%	74	2.5%
Chittenden	21.03	Milton East	4,082	158	3.9%	34	0.8%	221	5.4%
Chittenden	21.04	Milton Southwest	3,683	334	9.1%	195	5.3%	83	2.3%
Chittenden	22.01	Colchester South	3,287	575	17.5%	148	4.5%	201	13.4%
Chittenden	22.02	Colchester Northeast	4,890	563	11.5%	395	8.1%	401	8.3%
Chittenden	23.01	Colchester North	1,458	153	10.5%	54	3.7%	199	13.8%
Chittenden	23.03	Colchester Northwest	4,827	429	8.9%	277	5.7%	240	5.0%
Chittenden	23.04	Colchester Village	3,085	344	11.2%	507	16.4%	301	9.8%
Chittenden	24	Winooski West	3,479	1,054	30.3%	735	21.1%	850	24.7%
Chittenden	25.01	Winooski East	2,312	375	16.2%	378	16.3%	430	18.6%
Chittenden	25.02	Winooski South	2,224	201	9.0%	26	1.2%	351	16.2%
Chittenden	26.01	Essex Junction West	6,080	1,034	17.0%	764	12.6%	391	6.4%
Chittenden	26.02	Essex Junction East	4,393	717	16.3%	567	12.9%	407	9.3%
Chittenden	27.01	Essex Town West	6,025	649	10.8%	602	10.0%	458	7.7%
Chittenden	27.02	Essex Town East	5,353	481	9.0%	215	4.0%	287	5.4%
Chittenden	28	Jericho	5,082	246	4.8%	64	1.3%	216	4.3%
Chittenden	29	Westford, Underhill, Bolton	6,769	416	6.1%	196	2.9%	353	5.2%

County	Tract	Town	Total Population	Non-White or Hispanic Population	Pct.	Foreign Born	Pct.	Below Poverty Line	Pct.
Chittenden	30	Richmond	4,142	299	7.2%	120	2.9%	108	2.6%
Chittenden	31.01	Williston North	7,977	872	10.9%	696	8.7%	613	7.7%
Chittenden	31.02	Williston South	2,003	146	7.3%	37	1.8%	28	1.4%
Chittenden	33.01	South Burlington 116	4,463	841	18.8%	721	16.2%	144	3.2%
Chittenden	33.04	South Burlington US 7	6,538	1,050	16.1%	698	10.7%	309	4.9%
Chittenden	34.01	Shelburne East	5,329	479	9.0%	337	6.3%	235	4.4%
Chittenden	34.02	Shelburne West	2,353	154	6.5%	287	12.2%	210	9.5%
Chittenden	35.01	Charlotte	3,900	193	4.9%	313	8.0%	116	3.0%
Chittenden	35.02	Hinesburg, St. George	5,310	166	3.1%	209	3.9%	462	8.7%
Chittenden	35.03	Huntington, Buels Gore	1,812	133	7.3%	31	1.7%	108	6.0%
Chittenden	36	South Burlington Dorset	4,889	610	12.5%	512	10.5%	694	14.2%
Chittenden	39	Burlington UVM	7,766	1,113	14.3%	537	6.9%	1,015	51.8%
Chittenden	40.02	South Burlington East	4,152	854	20.6%	500	12.0%	379	9.2%
Chittenden	41	Burlington Main to Pearl Central	2,672	377	14.1%	170	6.4%	1,562	61.3%
Chittenden	42	Burlington ONE	4,480	725	16.2%	334	7.5%	1,465	33.6%
Franklin	101.01	Highgate	3,486	228	6.5%	83	2.4%	325	9.3%
Franklin	101.02	Franklin, Sheldon	3,673	148	4.0%	120	3.3%	297	8.1%
Franklin	102	Berkshire, Enosburg	4,186	496	11.8%	106	2.5%	611	14.9%
Franklin	103	Richford, Montgomery	3,541	240	6.8%	110	3.1%	486	13.7%
Franklin	104	Fairfield, Bakersfield	3,549	351	9.9%	125	3.5%	234	6.7%
Franklin	105	Swanton	6,724	423	6.3%	215	3.2%	739	11.0%
Franklin	106	St. Albans Town	6,819	238	3.5%	242	3.5%	326	4.9%
Franklin	107	St. Albans West	3,503	325	9.3%	57	1.6%	732	20.9%
Franklin	108	St. Albans East	3,363	365	10.9%	76	2.3%	371	11.2%
Franklin	109	Georgia	4,833	433	9.0%	134	2.8%	267	5.6%
Franklin	110	Fairfax, Fletcher	6,075	138	2.3%	17	0.3%	245	4.0%

County	Tract	Town	Total Population	Non-White or Hispanic Population	Pct.	Foreign Born	Pct.	Below Poverty Line	Pct.
Grand	201	North Hero, Alburgh, Isle La Motte	3,535	255	7.2%	168	4.8%	259	7.4%
Grand	202	South Hero, Grand Isle	3,714	347	9.3%	76	2.0%	213	5.8%
Washington	9540	Cabot, Marshfield, Plainfield	4,623	368	8.0%	164	3.5%	514	11.2%
Washington	9541	Woodbury, Calais	2,601	106	4.1%	45	1.7%	192	7.4%
Washington	9542	Worcester, Middlesex	2,815	112	4.0%	54	1.9%	152	5.4%
Washington	9543	Waterbury	5,240	155	3.0%	133	2.5%	524	10.1%
Washington	9544	Duxbury, Moretown	2,929	182	6.2%	64	2.2%	142	4.9%
Washington	9545	Berlin	2,884	117	4.1%	88	3.1%	170	6.5%
Washington	9546	Montpelier Northwest	2,166	96	4.4%	66	3.0%	137	6.3%
Washington	9547	Montpelier Northeast	1,716	163	9.5%	48	2.8%	110	6.4%
Washington	9548	Montpelier Downtown	2,140	116	5.4%	109	5.1%	59	2.8%
Washington	9549	Montpelier South	1,944	286	14.7%	151	7.8%	80	4.2%
Washington	9550	East Montpelier	2,567	97	3.8%	67	2.6%	71	2.8%
Washington	9551	Barre City North	4,637	394	8.5%	81	1.7%	973	21.2%
Washington	9552	Barre City South	3,877	193	5.0%	79	2.0%	997	26.8%
Washington	9553	Barre Town North	3,914	215	5.5%	67	1.7%	164	4.2%
Washington	9554	Barre Town South	3,934	340	8.6%	173	4.4%	112	2.9%
Washington	9555.01	Northfield West	2,555	98	3.8%	40	1.6%	535	21.4%
Washington	9555.02	Northfield East, Roxbury	4,746	677	14.3%	127	2.7%	427	13.9%
Washington	9556	Warren	1,632	70	4.3%	58	3.6%	253	15.5%
Washington	9557	Waitsfield	1,735	183	10.5%	65	3.7%	80	4.6%
Washington	9558	Fayston	954	10	1.0%	29	3.0%	27	2.9%
Orange	9591.01	Orange, Washington	2,051	126	6.1%	43	2.1%	115	5.6%
Orange	9592	Williamstown	3,515	149	4.2%	22	0.6%	333	9.5%
		TOTALS	289,699	29,114	10.0%	17,036	5.9%	29,084	10.0%

Source: American Community Survey 2017-2021 Reports B03002, B05002, and S1701

Measures to Ensure Minority, Low-Income and LEP Participation

As public transportation is perhaps disproportionately relevant to the daily lives of Title VI-protected groups and low-income Vermonters, GMT will ensure that groups that represent these populations are included in these outreach efforts and that representatives of these organizations are invited to participate in project steering committees. GMT's JEDI (Justice, Equity, Diversity, Inclusion) Committee (a subcommittee of the Board) works to ensure that the interests of traditionally marginalized communities are appropriately accounted for in all decision-making processes.

All public meetings held as part of this public involvement process will be properly noticed in accordance with the requirements of Title VI of the civil rights act of 1964 and the Vermont public meeting law (Vermont Title 1, section 310 et seq., as annotated), including public announcement of all meetings at least 24 hours before the meeting. Notes are taken at all meetings so that members of the public are not required to submit written comments in order to have their opinions recorded.

GMT and the regional planning commissions in its service area maintain contact with organizations that represent the interests of low-income, immigrant, and minority groups and notify them of upcoming public outreach activities.

Meeting times and locations are designed to maximize accessibility for low-income and minority groups. A mix of daytime and early evening meetings are scheduled and transit access to the meeting is guaranteed, including an extension of service span, if necessary, to provide rides home at the end of the meeting. In terms of meeting locations, Burlington, as the focus of Title VI-protected groups, will always host one public meeting/hearing in a series, but GMT will make efforts to hold additional meetings in Winooski, St. Albans, Barre/Montpelier and other towns to make the meetings more accessible to low-income residents.

GMT will contact organizations that represent Title VI-protected groups in their service area two weeks in advance of any public meetings or hearings being held regarding service changes, fare changes, or any other planning efforts. GMT will discuss with these groups means of encouraging participation in these meetings and will offer accommodations when appropriate to facilitate participation.

The following table lists all public meetings held since the last Title VI program was submitted.

Date	Purpose	Route(s) Affected	Location	Town	# of Attendees
1/13/21	Budget	None	GMT Admin Office	Burlington	0
4/14/21	Service Modifications	All (color coding), Williston, Middlebury	Virtual	Online	7
4/14/21	Service Modifications	All (color coding), Williston, Middlebury	Virtual	Online	4
1/12/22	Budget	None	GMT Admin Office	Burlington	3

4/5/22	Service Changes	#6 Shelburne, #7 North Avenue, #86 Montpelier LINK Express	Robert Miller Community and Rec Center	Burlington	17
4/6/22	Service Changes	#6 Shelburne, #7 North Avenue, #86 Montpelier LINK Express	Virtual	Online	38
4/7/22	Service Changes	#6 Shelburne, #7 North Avenue, #86 Montpelier LINK Express	Montpelier Transit Center	Montpelier	10
8/23/22	Seasonal Service	Mountain Road Shuttle #4 Essex Center/#10 Williston Essex, #1 Williston, #2 Essex Junction, #6 Shelburne Road	Stowe Town Office	Stowe	8
1/10/23	Budget/Service Mods		GMT Admin Office and Online	Burlington	38

Minority Representation on Planning and Advisory Bodies

GMT has two advisory committees. The racial breakdown of the committees is shown in the table below. Whenever GMT advertises for new members, the wording of the advertisement will include language encouraging minority and/or foreign-born individuals to apply for membership.

Committee	Total Members	Caucasian Members	African-American Members	Latinx Members	Other
JEDI	12	9	2		1
Microtransit Advisory	24	23		1	

Assisting and Monitoring Subrecipient Compliance

GMT has one subrecipient: Champlain Islanders Developing Essential Resources, Inc., better known as CIDER. CIDER operates service for elderly and disabled (E&D) residents of Grand Isle County under contract to GMT using Section 5311 funds distributed by VTrans. The contract was not competitively procured, unlike the case with Special Services Transportation Agency (SSTA), which operates ADA paratransit and E&D service within Chittenden County.

CIDER is in the process of updating its Title VI Program. VTrans is providing technical assistance to CIDER to update the program through its retainer contract. GMT will review the program and check to make sure that CIDER is fulfilling its commitments to the public in terms of notifications and procedures.

GMT will contact CIDER annually to ensure that all commitments are met. This includes monitoring the CIDER website to ensure that the Title VI notification and complaint procedures are easily accessible and spot-checking CIDER vehicles to ensure that the Title VI notification is posted properly.

At this time, GMT is considering changing the status of SSTA from a contractor to a subrecipient in order to forego the periodic procurement process. If the GMT and SSTA boards agree to this change, then GMT will ensure that SSTA establishes a compliant Title VI program and monitor its Title VI compliance as it currently does for CIDER.

Transit Facilities

GMT is in the planning stages of a new maintenance facility in Washington County to replace the facility it currently leases on VT Route 12 in Berlin. As part of the site selection process, GMT commissioned an equity analysis in January 2022. This equity analysis, documented in a memorandum dated February 11, 2022 concludes that “because both of the proposed sites are in Block Group 2, there is no disparate impact on minority or foreign-born individuals for either of the sites. They all have equivalent and minimal impacts on protected classes of residents.” The analysis also found that there were no residences immediately adjacent to either of the proposed sites and thus any impacts would be minimal.

Service Standards & Policies

GMT has set the following service standards and policies according to the service type. GMT’s service types are as follows:

Urban Trunk Routes – These are local routes that travel along major corridors and link several major trip generators to downtown locations. These routes include the #1 Williston, #2 Essex Junction, #6 Shelburne Road and #7 North Ave.

Urban Local Routes – These are local routes that connect neighborhoods to activity centers. These routes include the #5 Pine Street, #8 City Loop, #9 Riverside/Winooski, #10 Williston/Essex and #11 Airport/Waterfront.

Rural Local Community Routes – These are local routes that operate in rural communities in Washington and Franklin counties. These include the City Commuter and Midday routes, the Barre Hospital Hill route, and St. Albans Downtown Shuttle.

Commuter Routes – These are longer distance routes that primarily operate during peak hours and connect Burlington, Waterbury and Montpelier to surrounding communities and counties. They have limited stops and in some cases, a higher fare is charged. These routes include the Jeffersonville Commuter, 116 Commuter, Milton Commuter, Waterbury Commuter, Northfield Commuter, Alburgh/Georgia Commuter, Richford/St. Albans Commuter, St. Albans LINK Express, and Montpelier LINK Express.

Shuttle Routes – These include shopping shuttles in both the urban and rural areas as well as ski season shuttles in Stowe and the Mad River Valley. While these are very different types of service, what they have in common is that the service level is specific to the trip generator.

1) Vehicle Load

Service Type	Peak Hour Load Standard	Single Trip Max Load
Urban Trunk Routes	1.3	1.5
Urban Local Community Routes	1.0	1.5
Rural Local Community Routes	1.0	1.5
Commuter Routes	1.0	1.0
Shuttle Routes	1.3	1.5

The local trunk route standard means that on a bus with 30 seats, an average of up to 39 passengers could be accommodated without a load violation during the peak hour and 45 passengers could be accommodated on single trips. For the local community and commuter routes, on a bus with 30 seats, an average of up to 30 passengers could be accommodated without a load violation during the peak hour and 45 passengers could be accommodated on select trips.

2) Vehicle Headway

SERVICE HEADWAYS (minutes)	Weekday	Saturday	Sunday
Microtransit average wait - Rural	20	20	No Service
Microtransit average wait- Urban	15	20	20
Commuter - Rural	1 trip per peak	No Service	No Service
Commuter - Urban	2 trips per peak	No Service	No Service
Shuttle - Rural		Generator specific	
Shuttle - Urban		Generator specific	
Local - Rural	60	60	No Service
Local - Urban	30 peak/60 off peak	60	60
Trunk	20 peak/30 off peak	30	30

3) On-time Performance

For all service types, GMT’s goal is to operate 95% of trips within a window of no more than one minute early and no more than five minutes late at the route terminals. Commuter trips may arrive early at their destination as long as they depart no more than one minute early from the last stop in outlying areas. There will be no “missed trips” as defined by 15 or more minutes late, except when conditions make it impossible to maintain scheduled service.

4) Service Availability

To the extent funding is available, GMT will offer fixed-route bus service to at least 95% of areas within its four-county service areas that have more than 3 households per acre and are contiguous with other areas with equal or greater density. An area is considered served if it is within one half mile of the bus alignment.

5) Distribution of Transit Amenities

GMT will provide passenger amenities based on patronage levels at bus stops around the region. GMT will work with municipalities to provide passenger amenities wherever possible, and their placement will be guided by the goal to serve the greatest number of passengers and achieve geographic distribution of amenities.

6) Vehicle Assignment by Mode

GMT’s policy of assigning vehicles to routes is based on needed capacity and a goal of maximizing the longevity of the bus fleet. The largest vehicles are used for those runs that have the highest ridership. Maintenance staff works to equalize the mileage among buses in the fleet so that all of the vehicles can achieve their optimal life span.