



NAPA VALLEY TRANSPORTATION AUTHORITY PCC Agenda Letter

TO: Paratransit Coordinating Council
FROM: Kate Miller, Executive Director
REPORT BY: Rebecca Schenck, Principal Planner
(707) 259-8636 / Email: rschenck@nvta.ca.gov
SUBJECT: Napa Valley Transportation Authority (NVTA) Title VI Program Policy
for Fiscal Years 2020-2022 Recommendation

RECOMMENDATION

That the Paratransit Coordinating Council (PCC) refer the Title VI Service Equity Analysis for the FY 2020-22 (Attachment 1) and for the local Vine 2020 Service Revisions (Attachment 2) to the Napa Valley Transportation Authority (NVTA) Board for approval.

COMMITTEE RECOMMENDATION

None

EXECUTIVE SUMMARY

The purpose of this policy is to establish guidelines to effectively monitor and ensure that the Napa Valley Transportation Authority (NVTA) is in compliance with all Federal Transit Administration (FTA) Title VI requirements under Federal Department of Transportation Title 49 CFR § 21.

FISCAL IMPACT

Is there a Fiscal Impact? No

CEQA REQUIREMENTS

ENVIRONMENTAL DETERMINATION: The proposed action is not a project as defined by 14 California Code of Regulations 15378 (California Environmental Quality Act (CEQA) Guidelines) and therefore CEQA is not applicable.

BACKGROUND AND DISCUSSION

The Napa Valley Transportation Authority is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Its objective is to:

- Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin;
- Promote the full and fair participation of all affected populations in transportation decision making;
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;
- Ensure meaningful access to programs and activities by persons with limited English proficiency.

In this endeavor, staff has updated NVTA's Title VI policies from fiscal year 2017-2019 to continue to meet the requirements outlined in Fixing America's Surface Transportation Act (FAST). This effort involved conducting a four-factor Limited English Proficiency analysis which was used in the development of a Public Participation Plan and Language Assistance Plan. In addition, public transit properties that receive federal funds are required to establish service standards that inform the agency when and how to best make service adjustments. Updated Service Standards were approved by the Board as part of the Napa County Short-Range Transit Plan (FY 2016-2026) and are included as part of the agency's overall Title VI Policies and Program.

The program will be subject to minor modifications based on Federal Transit Administration review and recommendations after the plan has been submitted to the Regional Civil Rights Officer.

The final attachment is the Title VI Service Equity Analysis for the Local Vine 2020 Service Revisions. This analysis compares the demographics of the population of the City of Napa with the new local service (Routes A-H) starting January 2020. The analysis determines that a greater percentage of minority and low income City of Napa residents will be served by the new system than exist in the City of Napa as a whole. For example, the percentage of households with annual income under 200% of the federal poverty level represents 26.3% of the City of Napa's population. The low-income population for the area within ¼ mile of the stops in the City of Napa is slightly higher at 31.2%. Therefore, the impact on minority or low income population does not constitute a disparate or a disproportionate impact and the changes align with NVTA's Title VI Program Policy.

SUPPORTING DOCUMENTS

Attachments: (1) Napa Valley Transportation Authority Title VI Program Policy
(2) Title VI Service Equity Analysis for the Local Vine 2020 Service Revisions



TITLE VI PROGRAM POLICY

Chris Canning NVTA Chair

Date

| NVTA Board Approved XX/XX/2019

CONTENTS

TITLE VI PROGRAM MONITORING	3
PUBLIC INFORMATION REQUIREMENTS	4
LIMITED ENGLISH PROFICIENCY (LEP) FOUR FACTOR ANALYSIS AND LANGUAGE ASSISTANCE PLAN (LAP)	5
PUBLIC PARTICIPATION PLAN	5
COMPLAINTS OF DISCRIMINATION PROCEDURE	7
GENERAL REPORTING REQUIREMENTS	9
FACILITY SITE EQUITY ANALYSIS.....	10
SERVICE STANDARDS	10
RECORD KEEPING REQUIREMENTS.....	10
APPENDICES.....	12

TITLE VI PROGRAM POLICY

The Napa Valley Transportation Authority (NVTA) is committed to ensuring that no person is excluded from participation in, or denied benefits of its transit services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964. If you believe you have been subjected to discrimination under Title VI, you may file a written complaint with Karalyn Sanderlin Civil Rights Officer, Napa Valley Transportation Authority, 625 Burnell Street, Napa CA, 94558; at (707) 259-8631, or by email to ksanderlin@nvta.ca.gov.

Purpose: The purpose of this policy is to establish guidelines to effectively monitor and ensure that the Napa Valley Transportation Authority (NVTA) is in compliance with all requirements and regulations to carry out the provisions of the Department of Transportation's (DOT) Title VI Regulations 49 CFR Part 21.

Policy: NVTA will ensure that their programs, policies, and activities all comply with the Department of Transportation's (DOT) Title VI regulations. NVTA is committed to creating and maintaining public transit service that is free of all forms of discrimination. The agency will take whatever preventive, corrective and disciplinary action necessary for behavior that violates this policy or the rights and privileges it is designed to protect.

TITLE VI PROGRAM MONITORING

The requirement to establish internal monitoring processes and methodologies is applicable to all recipients of Federal assistance. NVTA must monitor its service once per year, or when major service changes or fare increases are proposed, using the procedures outlined in this section.

a. Civil Rights Assurance

The assurances that are signed by NVTA's Executive Director, and attested by Legal Counsel, validate the level and quality of transit services and related benefits are provided in a manner consistent with Title VI. Program monitoring is conducted to ensure that NVTA complies with this assurance.

b. Monitoring Procedures

NVTA has a complaint procedure to monitor the level and quality of transit service provided to minority communities with overall average services deployed throughout the system in order to affirm the services are distributed equitably and comply with Title VI.

~~This internal~~NVTA used this internal monitoring process ~~was used~~ recently on September 20, 2017 when NVTA performed a service equity analysis of the elimination of the Vine Transit Route 25 service between Napa and Sonoma. The analysis examined the effect of the service elimination on minority and low-income populations. The disparate impact analysis determined that although

the number of minority riders was 1.4% greater than the general population, the figure was not high enough to constitute a disparate impact. Furthermore, the disproportionate burden analysis showed that the population under 200% of the federal poverty line was 2.7% higher than the general population; once again, the analysis indicates that there is not a disproportionate burden. Overall, these findings had to be compared to the identical analysis run on the discontinuation of the Route 21 service. There would be a larger impact on minority and low income riders than shown in the Route 25 analysis. This is relevant because the Route 21 shares the same funding source with the Route 25. Given the decrease in funding, NVTA must end one route. Elimination of Route 25 will have the fewest impacts as it has the lowest ridership among Vine's intercity routes. The change does not have a disparate impact nor a disproportionate burden upon the area affected by the service change, and the percentage of the effected minority and low-income population is less than the same population that would be affected if Route 21 was discontinued. The NVTA Board moved forward with the Route 25 elimination due to the reduction in federal funding.

~~January 2015 when NVTA performed an equity analysis of a planned seven percent (7%) fare increase. The analysis examined the effect of the proposed fare change on minority and low income populations. The disparate impact analysis determined that although the number of minority riders was greater than the general population, that it was not high enough to constitute a disparate impact. Furthermore, the disproportionate burden analysis showed that the populations under 200% of the federal poverty limit were less likely to be impacted than the general population, and that zero-vehicle households would be more affected by the fare increase. Overall, this last finding related to zero-vehicle households, had to be balanced against the alternative solution to address farebox increases which was service cuts. In the end, the NVTA moved forward with the seven percent (7%) fare increase, its' first increase since 2012.~~

c. Subrecipients

NVTA is also responsible for monitoring subrecipients for compliance with Title VI, and establishing a schedule of subrecipient Title VI program submissions. NVTA does not have any subrecipients and has not had any over the last three (3) years. In the event that the NVTA would have a subrecipient, the agency will establish a schedule for subrecipient submissions.

PUBLIC INFORMATION REQUIREMENTS

NVTA disseminates Title VI Program information to NVTA employees, contractors, subcontractors, and beneficiaries. NVTA makes these materials available to the general public by posting information at major transit hubs, on its website (which includes Title VI/Civil Rights complaints procedures), on all of public transit buses, at the Soscol

Gateway Transit Center, the major transit hub in the system, and by publishing an annual Title VI Policy Statement in local newspapers. Specifically the notice was placed on all of the NVTA owned buses and buildings and on the website at <http://www.ridethevine.com/title-vi-notice-public> as <https://vinetransit.com/title-vi/> as verified by the Civil Rights Officer and included as Appendix 9. The local newspapers that NVTA uses to publish information about public meetings and/or hearings, service changes, and proposed projects have significant circulations in the community. NVTA also publishes information in minority publications. Information about Title VI and NVTA's policies are also clearly stipulated in NVTA's postings for contracting and employment opportunities. Specifically:

- a. NVTA's Title VI Policy and any other related information is made available to the public upon request.
- b. More detailed information regarding complaint procedures and Title VI civil rights is included in brochures and other materials distributed to the public by NVTA and are available on NVTA's websites (www.nvta.ca.gov and www.vinetransit.com).
- c. Multilingual Requirements. Where a significant number or portion of the population eligible to be serviced by NVTA needs service information in a language other than English to participate in federally funded programs, NVTA takes every reasonable step to provide information in appropriate languages. In cases where NVTA posts signs warning the general public about dangerous situations, information in other languages when a significant number of the population in non-English speaking. NVTA's website ~~ises are~~ also linked to the Google translator which can provide translation in over 70 languages and the new vinetransit.com website contains information and links for users in Spanish and Filipino for browser translation.

LIMITED ENGLISH PROFICIENCY (LEP) FOUR FACTOR ANALYSIS AND LANGUAGE ASSISTANCE PLAN (LAP)

NVTA has developed a Language Assistance Plan based on its Four Factor Analysis consistent with the Federal Transit Administrations policy guidelines. The Plan guides NVTA on all service-related planning and policy changes under consideration, NVTA staff has analyzed and conducted the four-factor framework provided in the Department of Transportation (DOT) Limited English Proficiency Guidance. NVTA's complete LAP plan based upon the LEP analysis is included as Appendix 1.

PUBLIC PARTICIPATION PLAN

The Public Participation Plan (Appendix 2) outlines the strategies NVTA uses to engage the public in the process of transportation decisions. While major service changes will require outreach and a public hearing consistent with this Public Participation Plan, a Title VI equity analysis, and Board approval, minor service changes, such as temporary

schedule or route adjustments (with prior notice to riders), emergency changes made to respond to natural or man-made disasters or fiscal emergencies, or the creation, alteration, or elimination of special event service, can be authorized by NVTA's Executive Director. This plan is utilized to cultivate relations with the community and encourage interaction with the minority of non-English speaking communities. Public Notices and general information are provided in English, Spanish and Filipino.

a. OPPORTUNITIES FOR PUBLIC COMMENT

NVTA routinely provides opportunities for public comment, and continually strives to find new and innovative opportunities to solicit public comments and involve all segments of the population. Comments are accepted at any time by phone, fax, email, via the NVTA and Vine website, U.S. mail, in person, or at any open meeting. Examples of these opportunities include:

- The public is notified of monthly NVTA Board and Committee meetings. The public is invited to attend these meetings. Meeting announcements are posted on the website, at the NVTA offices, and at the meeting location if held at a location other than the NVTA offices. The public is invited to comment on general items or specific agenda items

b. ENGAGING TITLE VI PROTECTED GROUPS

NVTA realizes there are large segments of the population from whom input is rarely if ever received. In an effort to hear a truly representative voice of the public, NVTA makes all significant service-related planning and policy publications available in accessible formats.

c. PUBLIC OUTREACH

NVTA ~~publishes monthly memos and newsletters~~ regularly updates its website as an on-going, proactive dissemination of service information and to cultivate public relations. ~~These publications~~ These updates contain articles and features of current issues and projects. Moreover, they serve as a valuable information tool to present transportation planning to the public.

d. STAFF ACCESSIBILITY

Staff is accessible in person, on the phone, by mail, by fax, or by email. Contact information is provided on the agency's website and on public notices.

e. PROVIDE SERVICE FOR THE DISABLED AND LEP

Upon advance notice, special accommodations are provided for public meetings. These services include translators, special assistance, and/or transportation.

COMPLAINTS OF DISCRIMINATION PROCEDURE

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Civil Rights Restoration Act of 1987, and the Americans with Disabilities Act of 1990, relating to any program or activity administered by NVTAs as to consultants, and contractors. Intimidation or retaliation of any kind is prohibited by law. The procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination. Every effort is made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the Title VI Coordinator may be utilized for resolution.

Complaint Procedure

1. Any person who feels that he or she, individually, or as a member of any class of persons, on the basis of race, color, national origin, age, sex, disability, religion, or low-income status has been excluded from or denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance through NVTAs may file a written complaint with the Civil Rights Officer. The complaint form (Appendix 3) may be found on the NVTAs website by clicking the following link: www.nvta.ca.gov/title-vi-0 or is available in hard copy from the NVTAs. A formal complaint must be filed within 180 days of the alleged occurrence.
2. In cases where the complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The Civil Rights Officer will interview the complainant and if necessary assist the person in converting verbal complaints to writing. All complaints must, however, be signed by the complainant or his/her representative.
3. Complaints shall state, as fully as possible, the facts and circumstances surrounding the alleged discrimination.
4. NVTAs will provide the complainant or his/her representative and any contractor (respondent) with a written acknowledgement that NVTAs has received the complaint within five (5) working days of receipt.
5. A copy of the complaint will be forwarded to legal counsel for review.
6. The Civil Rights Officer will appoint one or more staff review officers, as appropriate, to evaluate and investigate the complaint.
7. The review officer(s) will determine if the complaint has investigative merit:
 - a. It was received within 180 days of the alleged occurrence.
 - b. It does not appear to be frivolous or trivial.
 - c. It involves NVTAs or NVTAs contractors and not another entity.

- d. A complaint against a contractor involves a NVTA Federally Funded contract.
8. The complainant and contractor or other party to the complaint will be notified of the status of the complaint within ten (10) days of receipt of the complaint, *by registered mail*:
 - a. That the complaint will not be investigated and the reasons why the complaint does not have investigative merit.
 - b. That the complaint will be investigated and a request for additional information needed to assist the investigator.
9. The complainant or contractor must submit the requested information within 60 working days from the date of the original request. Failure of the complainant to submit additional information within the designated timeframe may be considered good cause for a determination of no investigative merit. Failure of the contractor to submit additional information within the designated timeframe may be considered good cause for a determination of noncompliance under the contract.
10. The review officer(s) and/or contractor must within 15 working days, supply the Executive Director with status report of their investigation and/or resolution of the complaint.
11. Within 60 working days of the receipt of the complaint, the Civil Rights Officer will prepare a written report for the Executive Director.
The report shall include:
 - a. A narrative description of the incident. Including persons or entities involved.
 - b. A statement of the issues raised by the complainant and the respondent's reply to each of the allegations.
 - c. Citations of relevant Federal, State and local laws, NVTA policy etc.
 - d. Description of the investigation, including list of the persons contacted and a summary of the interviews conducted.
 - e. A statement of the investigator's finding and recommendations for disposition.
12. The investigative report and findings of the complaint will be sent to legal counsel for review.
13. The Executive Director shall, based on the information before him or her and in consult with legal counsel, make a determination on the disposition of the complaint. Determination shall be made within ten (10) days from Executive Director's receipt of the investigator's report. Examples of disposition are as follows:
 - a. Complainant is found to have been discriminated against. NVTA or contractor is therefore noncompliant with Title VI regulations. Reasons for

the determination will be listed. Remedial actions that NVTA or the contractor must take will be listed.

- b. Complaint is found to be without merit. Reasons why will be listed.
14. Notice of the Executive Director's determination will be mailed to the complainant and contractor. Notice shall include information regarding appeal rights of complainant and instructions for initiating such an appeal. Example of a notice of appeal follows:
 - a. NVTA will only reconsider this determination, if new facts, not previously considered.
 - b. If the complainant is dissatisfied with the determination and/or resolution set forth by NVTA, the same complaint may be submitted to the Federal Transit Administration (FTA) for investigation. Complainants will be directed to contact Federal Transit Administration, Office of Civil Rights, San Francisco Federal Building 90, 7th Street, Suite 15-300 San Francisco, CA 94103. (415) 734-9490..
 15. A copy of the complaint and NVTA's investigation report/letter of finding and Final Remedial Action Plan will be issued to FTA within ninety (90) days of the receipt of the complaint.
 16. After receiving FTA's comments, briefings may be scheduled with all relevant parties to the complaint.
 17. A summary of the complaint and its resolution would be included in the annual report to the FTA.

GENERAL REPORTING REQUIREMENTS

Title VI of the Civil Rights Act of 1964 (Title VI), states the following: "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 be subjected to discrimination under any program or activity receiving Federal Financial assistance."

The Department of Justice and the Department of Transportation regulations implementing Title VI, require Federal agencies to collect data and other information to enforce Title VI. In this regard the Napa Valley Transportation Authority (NVTA), as an applicant and/or recipient receiving Federal funding, hereby provides to FTA the following information:

- There are no active lawsuits or complaints naming NVTA nor were there any investigations, or lawsuits in the past three (3) years, which allege discrimination on the basis of race, color, or national origin with respect to service or other transit benefits.
- The NVTA maintains a log of Title VI complaints received. The log includes the date the complaint was filed, a summary of the allegations (which included the

basis of complaint), complaint status, and action(s) taken. There have been two (2) complaints filed within the last three (3) years which alleged discrimination on the basis of race, color or national origin with respect to service or other transit benefits. Appendix 6 presents a copy of the log and details of past complaints.

- There are currently no pending construction projects which would negatively impact minority communities being performed by NVTA.

FACILITY SITE EQUITY ANALYSIS

NVTA did not construct or acquire any facilities during the current Title VI program, ~~but NVTA did acquire a site for use for a future new maintenance facility. NVTA acquired two parcels within Napa County totally 8.08 acres (APN 057-250-025 and APN 057-250-03). The property is vacant and undeveloped so there was no displacement of persons from their residences or businesses. The property was acquired for fair market value and eminent domain was not necessary.~~

~~NVTA completed a Real Estate Acquisition Management Plan (RAMP) in August 2016 so that the public had access to the process the NVTA used for its real estate acquisition needs. NVTA adhered to the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (the Uniform Act), applicable Federal Transit Authority (FTA) and California Transportation Commission (CTC) Guidelines~~

SERVICE STANDARDS

In order to insure compliance with the Title VI Program and to accomplish the goal of providing efficient and effective service to the residents of Napa County, NVTA last updated the agency's series of service standards that provide a framework for service allocation as well as measures to continually examine public transit service to ensure that they meet efficiency and effectiveness standards in accordance with stated objectives as part of the Chapter 3 of the agency's Napa County Short Range Transit Plan (FY 2016-2026) (Appendix 4). NVTA will complete an update to the -Short Range Transit Plan in 2020.

Whenever major service changes are adopted, NVTA completes an equity analysis, which includes an analysis of adverse effects to ensure that the changes do not result in discrimination on the basis of race, color, or national origin. A major service change consists of a new transit route, new service on streets not previously used by any other route, aggregate change of 30 percent or more of the number of transit revenue hours, routing changes that alter 40 percent or more of a route's path.

RECORD KEEPING REQUIREMENTS

The Civil Rights Officer shall ensure that all records relating to NVTA's compliance to Title VI are maintained for a minimum of seven (7) years.

Records must be available for compliance review audits.

Copies of the following material will be kept available by the Civil Rights Officer for dissemination to the public upon request:

- NVTA's Title VI policy
- Annual reports to FTA
- Audit report findings and recommendations
- Summaries of actions taken by NVTA to remedy audit findings
- Complaints received and a summary of their disposition
- Annual report to Executive Director regarding Title VI compliance

APPENDICES

- Appendix 1 NVTA Plan for Language Assistance Plan to Limited English Proficient (LEP) Populations
- Appendix 2 Public Participation Plan
- Appendix 3 Title VI Complaint Form
- Appendix 4 Systemwide Service Standards and Policies
- Appendix 5 Title VI Notice to the Public
- Appendix 6 List of Transit-Related Title VI Investigations, Complaints, and Lawsuits
- Appendix 7 Racial Breakdown of the Membership of Transit-Related Advisory Committees
- Appendix 8 NVTA Resolution ~~16-2319-XX~~ approving the NVTA Title VI Program Policy
- Appendix 9 Title VI Evidence of Website Posting



Language Assistance Plan to Limited English Proficient (LEP) Populations

~~September 17, 2016~~ November 20, 2019

Also available in Spanish and Filipino

Napa Valley Transportation Agency
625 Burnell Street
Napa, CA 94559
info@nvta.ca.gov
(707) 259-8631

Para solicitar una copia en español del Plan de Servicios de Lenguaje para Poblaciones con Conocimiento Limitado del Inglés por favor llame al (707) 259-8631

Upang humiling ng isang kopya ng Language Assistance Plan in Filipino, pakitawagan (707) 259-8631

Language Assistance Plan for Napa Valley Transportation Authority (NVRTA)

Introduction

The Napa Valley Transportation Authority (NVRTA) serves as the congestion management agency and public transit provider for the jurisdictions in Napa County, and is one of the nine (9) Bay Area counties within the Metropolitan Transportation Commission (MTC) region. NVRTA's service area includes a population of 150,000~~122,000~~ residents ~~over 740 square miles of land~~, consisting mostly of smaller, rural communities and agricultural land. The service area is diverse, with large numbers of residents speaking a language other than English as their primary means of communication.

Individuals with a limited ability to read, write, speak or understand English are considered to be Limited English Proficient, or "LEP." In compliance with guidance and rules issued by the U.S. Department of Transportation, and Title VI of the Civil Rights Act of 1964, NVRTA has taken reasonable steps to ensure that all persons have meaningful access to its programs, services, and information, at no additional cost. This includes the following plan for LEP persons within NVRTA's jurisdiction.

A Language Assistance Plan starts with an assessment to identify LEP individuals who need assistance. NVRTA also plans to conduct surveys with transit operators, dispatch, customer service and ticket sales staff, regarding frequency of contact with LEP individuals or groups. Once the assessment is complete, the Language Assistance Plan is drafted and adopted by the agency.

Implementation of the Language Assistance Plan includes the development of language assistance measures, staff training, notification measures to LEP individuals, and monitoring and updating of the plan on a yearly basis.

Purpose

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. One critical concern addressed by Title VI is the language barrier that Limited English Proficiency (LEP) persons face with respect to accessing information about and using transit service. Transit operators must ensure that this group has adequate access to the agency's programs and activities, including public participation opportunities.

Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," forbids funding recipients from "restrict(ing) an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program," or from "utilize(ing) criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or

national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respects to individuals of a particular race, color, or national origin.”

FTA Circular 4702.1B was developed by the Federal Transit Administration (FTA) and details the administrative and reporting requirements for recipients of FTA financial assistance to comply with Title VI and related executive orders including on LEP.

The U.S. DOT’s FTA Office of Civil Rights’ publication “*Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons – A Handbook for Public Transportation Providers*” was used in the preparation of this plan.

Contents

This plan contains:

- A. A needs assessment based on the four-factor analysis
- B. Language assistance measures
- C. Staff training plan
- D. Contractor training
- E. Methods for notifying LEP persons about available language assistance
- F. Methods for monitoring, evaluating and updating plan

A. LEP Needs Assessment – the Four-Factor Analysis

Determination of Need

In order to prepare this Plan, NVTA implemented the U.S. Department of Transportation’s four factor LEP analysis, which considers the following:

1. The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population
2. The frequency with which LEP persons come in contact with NVTA programs, activities or services
3. The Importance to LEP Persons of NVTA’s Program, Activities and Services
4. The resources available to NVTA and overall cost to provide LEP assistance

Factor 1: Number and proportion of LEP persons served or encountered

NVTA used the American Community Survey (ACS) 5 Year survey data for 201~~30~~-201~~7~~4 for Limited English Proficient (LEP) Populations in Napa County to estimate the number or proportion of LEP persons who might use or want to use NVTA’s services.

- The ACS data above estimates the total population over the age of five of the in NVTA Napa County ~~service area to be: 142,456~~ 133,368
- The ACS data above estimates the total number of people who speak a language other than English in the NVTA Napa County service area is estimated to be: 46, ~~508~~ 378 or ~~35.434.7~~ 35.434.7% of the population.
- The ACS data above estimates the total number of LEP persons (those who speak English less than “very well”) in ~~the NVTA~~-Napa County ~~service area~~ is estimated to be: ~~21,443~~ 20,209 or ~~16.315.1~~ 16.315.1% of the population.

Factor 2: Frequency of LEP populations’ contact with existing programs, activities, and services

Statistical data regarding individual requests from LEP persons will be tracked as resources permit; however since several transit routes serve Napa County social service and non-profit agencies, it is likely that NVTA is providing services to many LEP individuals.

The main language spoken by LEP individuals within the NVTA service area is primarily Spanish and Filipino.

Factor 3: Importance to LEP population of programs, activities, and services

NVTA considers public transit to be an important and essential service for many residents, commuters, and visitors in the local service area. This includes local buses and buses servicing neighboring counties and the regional Bay Area Rapid Transit (BART) system, paratransit, and services for seniors. These services are used by people from all walks of life, including commuters, students, visitors, the elderly, and those with limited mobility.

There are a number of key interaction points with the bus system which could be problematic for LEP populations:

- NVTA’s websites- www.nvta.ca.gov and www.vinetransit.com
- Vine Transit’s customer service phone line
- Bus stop signage
- Printed schedules
- Fare payment
- Driver inquiries
- Onboard announcements
- Other printed materials

| Ensuring that critical information at these interaction points is available in languages commonly spoken is crucial to providing equitable access to Vine Transit's bus service for LEP populations.

While Customer Service personnel have access to translation services and the NVTA website has a tool allowing the website's content to be translated into more than 70 different languages, much of the critical information onboard buses and at the bus stops is not available in many of the languages identified in this document through the Census and customer surveys.

Opportunities for Improvement

Currently NVTA disseminates all information in English, with some critical information available in Spanish. Customer service personnel all speak English, with some speaking Spanish.

Given that Filipino language falls within the federal “Safe Harbor” guidelines, NVTA is obligated to expand the translation of vital materials into Spanish and Filipino.

With respect to other languages represented by fewer residents, NVTA currently meets basic requirements for access to information via website translation tool.

Despite the efforts to ensure access to information about its bus service among LEP populations, some key improvements can be made:

- ~~• Take into consideration that, according to a local Filipino newspaper, Filipinos may prefer to read materials in English rather than Tagalog.~~
- ~~• Information in Spanish and Filipino and links for users about browser translation were included in on the new website. Representing Google Translate options on the NVTA's websites in each respective language rather than listing them all in English. It should also be noted that FTA does not consider Google Translate as a sufficient translation tool for vital documents.~~
- ~~• Locate the Google Translate tool on the NVTA websites in a more prominent location (currently located at the bottom right corner of each page).~~
- Translate more printed information disseminated to the public into more languages (currently only translated into Spanish).
- Advertise in more media outlets that target languages other than English and Spanish.
- Translate information about fare payment and pass sales into more languages or use symbols to illustrate key ideas.
- Improve communication with targeted organizations such as Community-Based Organizations (CBOs) to ensure that more LEP individuals participate in outreach efforts.
- Always ask the CBO about the language needs of their group so that the right staff is available that for translation.
- Plan annual outreach with Filipino-American Association of American Canyon that serves the Filipino community in American Canyon
- Provide more bus rider presentations to various organizations, such as CBOs.
- Increase outreach/marketing efforts to include social media and traditional media (in various languages) so that higher LEP participation for outreach events focused on accessing information can be achieved. The placement of traditional media at bus stops and on buses may be especially critical toward improving information accessibility.

Factor 4: Resources available to NVTA and overall cost to provide LEP assistance

-NVTA makes every reasonable effort to communicate with LEP persons about available transit services, including providing the funding for translation of current services and bilingual

materials. ~~As resources permit, In conjunction with~~ NVTA's operator, NVTA will include training for all drivers on best practices for serving LEP individuals.

In addition to using a translation service, NVTA ~~recently hired additional~~ has Spanish-speaking staff at the Soscol Gateway Transit Center ticket office to better serve LEP individuals. NVTA has also translated key website pages into Spanish, Filipino and other languages.

~~In an effort to better serve the transit service needs of its users, NVTA recently completed construction of its new Transit Center facility. The expanded facility will allow NVTA to better communicate its transit services and serve the needs of the traveling public, including those of LEP populations.~~

NVTA works with many advocacy groups serving LEP individuals to gain insight regarding their needs and concerns about local transit services. This includes Napa County Department of Health and Human Services, Community Action Napa Valley, ~~SOMOS Napa, Hispanic Network Puertas Abiertas, Non-profit Coalition, and Legal Aid of Napa Valley and UpValley Family Services.~~ NVTA is continually exploring options for the best methods of delivering information and meeting the transit needs of all LEP persons and Napa County residents. NVTA ~~undertook significant Spanish language outreach during its Agricultural Worker Vanpool Program and~~ continues to expand community outreach efforts agency-wide.

B. Language Assistance Measures

Language measures currently used and planned to be used by the NVTA transit system to address the needs of LEP persons include the following:

- Translating vital documents in the following language(s): Spanish and Filipino.
- Translating key website pages
- Coordination of Oral and Written Translation Services
- Communication with LEP advocacy groups about transit services
- Increased use of signage with graphic visual images and pictograms to promote universal understanding
- Posting of bilingual notices informing LEP persons of available services
- Other (description of services): training new residents on how to use transit system
- NVTA provides bilingual (Spanish speaking) staff at public hearings and neighborhood meetings.
- The Customer Service staff for both telephone and in person assistance includes bilingual (Spanish speaking) staff.
- All public timetables include a note in Spanish on how to use the language line to get transit information.

- System maps and riders guides are printed in both English and Spanish.

C. Staff Training

To ensure effective implementation of this plan, NVTA will schedule orientations for new staff and annual training for all employees whose position requires regular contact with the public. Training will include a review of this plan and how to handle verbal requests for transit service in a language other than English.

D. Contractor Training

To ensure effective implementation of this plan, Vine Transit's contractor will schedule orientations for new employees and semi-annual training for all employees whose position requires regular contact with the public. Training will include a review of this plan and how to handle verbal requests for transit service in a language other than English.

E. Notice to LEP Persons about Available Language Assistance

NVTA will notify LEP individuals about the language assistance services available to them without cost by using the following methods:

- Brochures
- Sending information to local organizations serving LEP populations
- Website notices
- Including contact information for translation requests on all printed materials
- Posting of bilingual flyers at libraries, churches, schools, cultural and community centers
- Audio programs and radio ads
- Participation in local community events

Translated documents include ad cards, direct mailers, bus stop signs, customer brochures, meeting notices, and other customer outreach materials like construction-related notices and information pieces. Most translation is into Spanish, which covers the majority of NVTA's customer base. Additional "Safe Harbor" languages are translated as resources allow and circumstances dictate.

NVTA needs additional services to provide more meaningful access to LEP groups. The following are recommendations that can be implemented:

- Provide complaint forms in multiple languages.
- Increased use of universal pictograms or other symbols at bus stops or on buses.
- Increased translations of documents.

- Conduct more language-specific outreach beyond focus groups associated with the development of this plan.
- Provide a short survey regarding LEP needs on buses in various languages for LEP individuals who cannot make it to outreach meetings, where these individuals can voice their concerns and opinions directly to NVTA.

F. Monitoring, Evaluating and Updating Plan

NVTA staff will review this plan annually, including:

- Assessing the sufficiency of staff training and budget for language assistance,
- Reviewing current sources for assistance to ensure continuing availability, and
- Reviewing any complaints, comments and suggestions from LEP persons, or agencies serving LEP populations, received during the past year.

Annual plan revisions will be approved by the agency’s Executive Director and dated accordingly.

G. Dissemination of Plan

This plan is available on the NVTA website’s at www.nvta.ca.gov and www.vinetransit.com

This plan is also available at no cost in English, Spanish, or Filipino upon request by telephone, fax, U.S. Postal Service mail, e-mail, or in person at the NVTA’s office.

H. Contact Information

Questions or comments about this plan may be submitted to:

Napa Valley Transportation Agency
 ATTN: Civil Rights Officer
 625 Burnell Street
 Napa, CA 94559
 (707) 259-8631
 (707) 259-8638

Published: -----, 2019~~6~~



Title VI/Environmental Justice/Public Participation Plan

~~September~~ November 2019~~6~~

Also available in Spanish and Filipino

**Napa Valley Transportation Authority (NVTA)
625 Burnell Street
Napa, CA 94559**

Table of Contents

EXECUTIVE SUMMARY	1
1. INTRODUCTION	2
A. PURPOSE OF THE PUBLIC PARTICIPATION PLAN	2
B. SUMMARY OF PLAN DEVELOPMENT	2
2. NAPA COUNTY PROFILE	2
A. COMMUNITIES	2
B. DEMOGRAPHICS	3
E. TRADITIONALLY UNDERSERVED COMMUNITIES	6
3. OPPORTUNITIES AND CHALLENGES FOR PUBLIC PARTICIPATION	8
A. INTRODUCTION	8
B. TARGET POPULATION AND NEEDS	8
C. PARTNERSHIPS WITH COMMUNITY BASED ORGANIZATIONS (CBOS)	9
D. TRANSLATION AND INTERPRETIVE SERVICES	9
4. PUBLIC PARTICIPATION STRATEGIES	9
A. INTRODUCTION	9
B. EXISTING NVTA OUTREACH	10
C. RECOMMENDED STRATEGIES	10
5. PERFORMANCE METRICS AND GOALS	11
A. MONITORING AND RECORDING	11
B. PUBLIC PARTICIPATION OUTCOMES	12

EXECUTIVE SUMMARY

The mission of the Napa Valley Transportation Authority (NVTA) is to ensure the development of an efficient, effective and equitable transportation system for the residents, businesses and visitors to the Napa region, through a coordinated inter-jurisdictional decision making process. In order to carry out its mission to its fullest potential, NVTA solicits and receives input from all of its stakeholders, regardless of race, language or socioeconomic status.

Multicultural outreach and environmental justice initiatives are founded on the recognition of a community's cultural and economic diversity, as well as the awareness that some groups have not always enjoyed equal access to information, services, or other resources. Recent U.S. Census reports¹ indicate that Napa County fares better than many parts of the state: average rates of poverty in Napa County are below state averages, and average income is higher than the state average. However, these assessments cannot take into account the many cultural and economic challenges with which some individuals and groups are faced. As in other parts of California, the ethnic composition of Napa County is changing. Once predominantly Caucasian, the population of Hispanic or Latino residents has grown considerably in the last decade. Populations of Asian, African-American, Indo-European, Pacific Islander and Middle-Eastern people have also grown.

This Title VI Public Participation Plan (PPP) aims to identify communities that have been traditionally underserved by NVTA and determine the most effective ways to encourage the participation of these communities. The PPP is designed to be a living document that will be updated yearly to incorporate new data, methods, and outcomes, as identified through local outreach activities and best practices in the field. The NVTA will work with community partners to identify and implement strategies that remove barriers to access and participation for diverse community members.

¹ U.S. Census, American Communities Survey 2014-2017 Estimates,



1. INTRODUCTION

NVTA serves as the congestion management agency and public transit provider for the jurisdictions within Napa County, one of the nine Bay Area counties within Metropolitan Transportation Commission (MTC) region. According to 2017⁵ population estimates, nearly ~~142,500~~141,000 people reside on the roughly 740 square miles of land in Napa County. Land types include a mixture of smaller, rural communities and agricultural land. NVTA provides services to a diverse group of stakeholders, with a mixture of English and non-English speakers from a variety of cultural and socioeconomic backgrounds. The NVTA makes every reasonable effort to address the needs of all stakeholders by providing equal access and opportunities for ongoing involvement and participation in its operations.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origins in programs and activities receiving federal financial assistance. Under federal regulations, transit operators must take reasonable steps to ensure persons have access to their activities and programs. Public participation opportunities, already provided to the public in English, should also be made accessible to persons who have a limited ability to speak, write, read, or understand English.

A. PURPOSE OF THE PUBLIC PARTICIPATION PLAN

This Plan attempts to identify all minority, low-income, and Limited English Proficient (LEP) populations located within the NVTA service area. The Plan describes existing outreach methods that are used to communicate NVTA programs and services to the public. It also addresses strategies that can be applied to increase the involvement of traditionally underrepresented or underserved groups in order to develop more inclusive plans for the future.

B. SUMMARY OF PLAN DEVELOPMENT

To assist in the preparation of this report, NVTA conducted interviews with agency staff to gain an understanding of how inclusivity is currently incorporated in the planning process. This effort also included an attempt to thoroughly account for all minority and low-income populations served by NVTA. As described in the 2019⁷ Language Assistance Plan developed by NVTA Appendix 1 the agency plans to conduct training with operations, customer service, and dispatch staff in the future.

2. NAPA COUNTY PROFILE

A. COMMUNITIES

NVTA serves all of Napa County. This includes connections to portions of Solano County (Fairfield, Suisun, and Vallejo) and the BART Station in the City of El Cerrito.- According to the 2017² American Community Survey (ACS) 5-Year Estimates figures for Napa County, the total population was estimated to be ~~439,253~~141,000 residents. The City of Napa has the largest



population, followed by the cities of American Canyon, St. Helena, Calistoga and Yountville respectively.

In addition to the five incorporated cities and town listed above, there are several unincorporated communities within Napa County whose residents also depend on NVTA to meet their many and diverse transportation needs:

- Aetna Springs
- Angwin
- Berryessa Highlands
- Capell Valley
- Chiles Valley
- Circle Oaks
- Deer Park
- Dry Creek
- Gordon Valley
- Lokoya
- Los Carneros
- Moskowite Corner
- Mt. Veeder
- Oakville
- Pope Valley
- Rutherford
- Silverado Resort
- Soda Canyon
- Spanish Flat
- Vichy Springs

B. DEMOGRAPHICS

NVTA reviewed Census maps and data for Napa County in order to establish context for this PPP. According to the data available, the majority of Napa County residents identify themselves as Caucasian. A significant percentage of the local population identified as Hispanic or Latino, with a smaller number of respondents identifying as Asian, African American, or more than one race. According to a recent study², “immigrants are contributing to very rapid demographic change in Napa County, particularly in the urban areas in southern Napa County and Calistoga. This demographic shift is most evident in the student and young working-adult populations.” Approximately 33% of Napa County residents identify themselves as Hispanic or Latino, and another 7.4% identify as Asian. Small enclaves of ethnically and culturally-diverse groups, such as Sikhs, Filipinos, and Native Americans live within NVTA’s service area, in addition to a significant population of year-round agricultural workers. Given the predominance of undocumented immigrants working in agricultural labor as well as the use of contract firms based outside of Napa County, these numbers may underestimate the actual number of minority populations residing and working in Napa County.

A breakdown of the racial demographics in Napa County, as measured during the 2010-2014 American Community Survey 5-Year Estimates, are shown in **Table 1** below:

² “Profiles of Immigrants in Napa County”, Migration Policy Institute, May 2012, www.migrationpolicy.org/pubs/napa-profile



Table 1: Racial Demographics in Napa County

	Number	Percentage (%)
Total Population	141,005	
One Race	135,672	96.2%
White	102,418	72.6%
Black of African American	2,998	2.1%
American Indian or Alaska Native	1,236	0.9%
Asian	11,150	7.9%
Native Hawaiian or Other Pacific	297	0.2%
Other One Race	17,573	12.5%
Two or More Races	5,333	3.8%
Hispanic or Latino (of any Race)	47,547	33.7%

Total Population	139,253	
One Race	134,303	96.4%
White	107,543	77.2%
Black or African American	2,992	2.1%
American Indian or Alaska Native	696	0.5%
Asian	10,362	7.4%
Native Hawaiian or Other Pacific	356	0.3%
Two or more Races	4,950	3.6%
Hispanic or Latino (of any race)	45,937	33.0%

(Source: US Census, 2014-2017 Napa County Demographic and Housing Estimates)

Outside of the Napa County service area, Hispanic or Latino peoples comprise approximately 27.26% of the population in the Solano County cities of Fairfield and Suisun.

C. LANGUAGE

In Napa County, approximately 85.4% of the population speaks English “very well” according to U.S. Census standards. This figure includes both native English speakers and speakers of multiple languages. Of the total population, 35% of all people speak a language other than English. Approximately half of those people, or 15.7%, are considered to speak English “less than very well.” These communities are the focus of this study. **Table 2** shows a numerical breakdown of languages spoken at home in Napa County.

Table 2: Language Spoken at Home in Napa County

Category	Percentage (%)
Speak English Very Well	84.9%
Speak English Less Than Very Well	15.1%
Speak only English	65.3%
Speak a language other than English	34.7%
Spanish or Spanish Creole	27.1%
Other Indo-European languages	2.5%
Asian and Pacific Island languages	4.9%
Other languages	0.3%

Speak English Very Well	84%
Speak English Less Than Very Well	16%
Speak only English	64.6%
Speak a language other than English	35.4%
— Spanish or Spanish Creole	27.9%
— Other Indo-European languages	2.5%
— Asian and Pacific Island languages	4.7%
— Other languages	0.3%

(Source: US Census Bureau, American Community Survey 20140-20174, Napa County)

Please see the NVTAs 20197 Language Assistance Plan for Limited English Proficient (LEP) Populations (Appendix 1 for more information.

D. ECONOMIC CHARACTERISTICS

The U.S. Census Bureau studied labor patterns in Napa County between 20140 and 20174. According to this study, there are approximately ~~67,310~~71,110 people employed people in Napa County. Of these workers, 1.40% were identified as relying on public transportation to commute to work. This figure is below the state's average of 5.2%, and may represent an opportunity for NVTAs to increase its transit ridership.

There are approximately 49,630-044 households in Napa County. An analysis of income per household is presented in Table 3.

Table 3: Household Income in Napa County

Total Households	Number	Percentage (%)
Less than \$10,000	1,581	3.2%
\$10,000 to \$14,999	1,880	3.8%
\$15,000 to \$24,999	3,182	6.5%
\$25,000 to \$34,999	3,309	6.7%
\$35,000 to \$49,999	5,463	11.1%
\$50,000 to \$74,999	7,911	16.1%
\$75,000 to \$99,999	6,375	13.0%
\$100,000 to \$149,999	8,766	17.9%
\$150,000 to \$199,999	4,705	9.6%
\$200,000 or more	5,872	12.0%

Total Households	49,631	
Less than \$10,000	1,714	3.5%
\$10,000 to \$14,999	2,105	4.2%
\$15,000 to \$24,999	4,134	8.3%
\$25,000 to \$34,999	3,727	7.5%
\$35,000 to \$49,999	6,250	12.6%
\$50,000 to \$74,999	8,199	16.5%
\$75,000 to \$99,999	6,723	13.5%
\$100,000 to \$149,999	8,724	17.6%
\$150,000 to \$199,999	3,690	7.4%
\$200,000 or more	4,365	8.8%

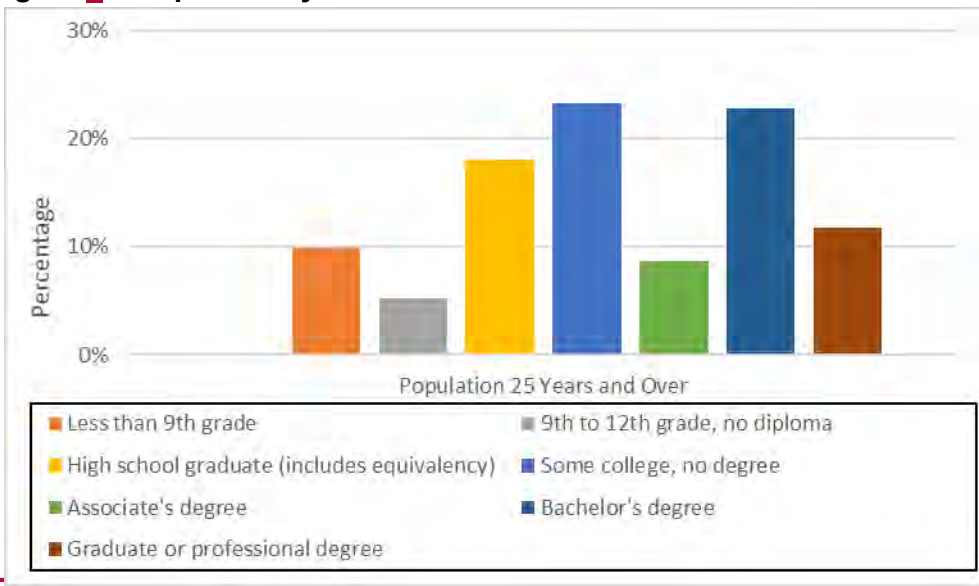
(Source: US Census Bureau, American Community Survey 2014-2017, Napa County)

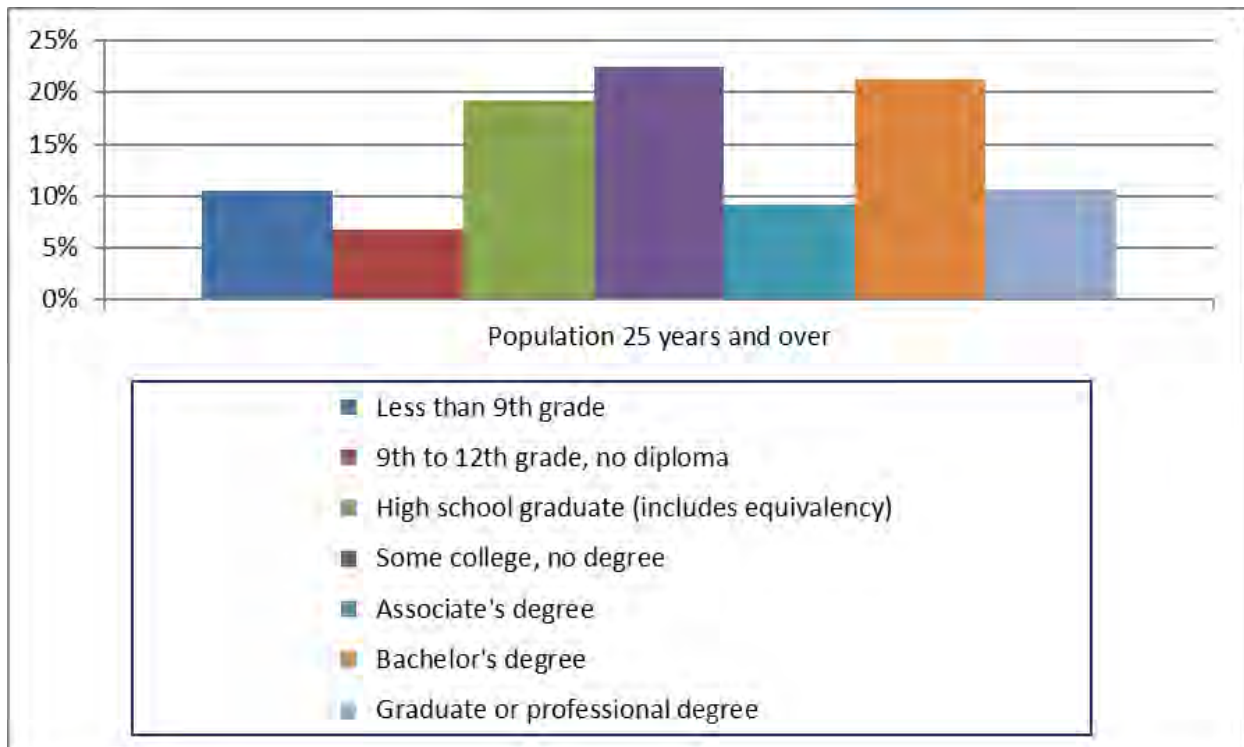
Napa County has an ~~average (mean) median~~ income of ~~\$92,291~~~~79,637~~, which is ~~nearly around~~ ~~\$512,000~~ higher than the state average of ~~\$87,087~~~~67,169~~. Also, the rate of poverty, i.e. the percentage of total families with an income below thresholds that vary by family size and composition, is ~~57.3%~~. This figure is below the California average of ~~42.3~~~~11.1%~~ of all families.

E. TRADITIONALLY UNDERSERVED COMMUNITIES

To determine which communities qualify for consideration as low-income and minority populations, NVRTA analyzed U.S. Census Data and established partnerships with local community-based organizations and city and county agencies that serve these populations. NVRTA acknowledges that sub-groups exist within traditionally underrepresented ethnic and income groups (e.g. individuals who are mentally or physically handicapped or homeless, etc.) and makes a reasonable effort to serve those sub-groups, as resources and staff permit. Agricultural laborers in Napa County are reported to have lower levels of formal education, as well as limited English proficiency and other cultural and socio-economic barriers that may prohibit access to information and services. **Figure 1** shows the education level of Napa County workers using the five year estimates 2014-2017 ACS data

Figure 12: Napa County Education Level





Source: ACS (http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml)

3. OPPORTUNITIES AND CHALLENGES FOR PUBLIC PARTICIPATION

A. INTRODUCTION

The NVTA faces a wide range of socio-economic challenges and ethnicity-based differences in meeting the needs of Napa County residents and visitors classified under Title VI regulations. Napa County's unique agricultural heritage and reputation attract people from every part of the world. Napa County is becoming more ethnically diverse and beginning to more closely reflect regional population patterns. Many people in Napa County are employed in the wine and hospitality industries, including many agricultural laborers. The interconnections that exist between industries in Napa County, such as between the wine and hospitality industries, also extend to, and have economic impacts on, other businesses and residents of Napa County. The wine industry continues to use an increasing amount of contract labor from third parties outside Napa, which is not reflected in the U.S. Census Bureau statistics for the area or their estimates for reliance on public transportation by this segment of the population.

B. TARGET POPULATION AND NEEDS

Vineyard workers in Napa County have been identified as predominantly Hispanic or Latino and relatively young. Along with their extended families, these laborers represent a growing audience for the NVTA's Title VI community outreach efforts. Farmworker Housing Centers, churches, schools and community organizations serving the local Hispanic or Latino community, are provided with copies of translated NVTA materials and information on how to access

Spanish-speaking staff or translators. Ongoing outreach to other ethnically, culturally or economically-disadvantaged groups throughout Napa County is maintained through regular contact with representatives from community based organizations (CBOs) and local agencies that serve these populations. Specific methods used for outreach to LEP individuals are also outlined in NVTA's 2019~~7~~ Plan for Language Assistance Appendix 1.

Several current studies³ indicate that the average age of employees outside of agriculture, both in and out of Napa County, is shifting to relatively older workers. This is particularly true for many hospitality industry employees. Napa County has a significant senior population, many of whom live on fixed incomes and have limited access to transportation due to economic, geographic, or physical limitations.

C. PARTNERSHIPS WITH COMMUNITY BASED ORGANIZATIONS (CBOs)

NVTA has identified and maintains contact with a network of representatives from local Community Based Organizations (CBOs), non-profit, faith-based and volunteer groups, health care, ~~legal aid~~ and social service agencies, educators and administrators. The agency relies on these groups to provide input and feedback on their programs and services, as well as to disseminate information to the populations served by or involved with these groups and organizations. Enhanced outreach to these groups includes regular distribution of bilingual (Spanish and English) collateral materials with current route and scheduling information, as well as updates on new programs and services provided by telephone, email, website links and social media posts.

D. TRANSLATION AND INTERPRETIVE SERVICES

NVTA continues to enhance its efforts to provide equal access to low-income, minority and LEP populations. This is accomplished by translating website pages; distributing route schedules, reports and other agency materials; and making translation services more widely available at public venues and community events.

4. PUBLIC PARTICIPATION STRATEGIES

A. INTRODUCTION

Effective public participation strategies utilize a variety of methods to engage the greatest number of people. NVTA continually strives to meet this strategic objective with existing staff and other resources. The following factors guide NVTA staff in the design and implementation of public participation strategies:

- Size and/or scale of the plan or project (regional or county-wide, neighborhood level, etc.)

³ "The Labor Market in Napa County, California: Opportunities and Challenges for the Wine Industry", IMPACT Napa Conference, North Bay Business Journal, August 29, 2013, <http://www.northbaybusinessjournal.com/wp-content/uploads/Robert-Eyler-economics-presentation-for-Impact-Napa-2013.pdf>; "Economic Opportunity and Workforce Development in Napa County", Prepared for the Napa County Workforce Investment Board, September 2010, www.napaworkforce.org/portals/3/downloads/report/NapaEconRpt10.pdf; "Profiles of Immigrants in Napa County", Migration Policy Institute, May 2012, www.migrationpolicy.org/pubs/napa-profile



- Level of potential impacts, including social, economic and environmental impacts

B. EXISTING NVTA OUTREACH AND HISTORY OF PUBLIC OUTREACH AND INVOLVEMENT ACTIVITIES

NVTA has and will continue to use a broad array of communication tools and resources over the last three years to reach out to Napa County residents, businesses, CBOs, service agencies, neighborhood and community groups, visitors, commuters and other potential transit users groups, all of which have the potential to include Title VI-qualifying communities. Some of the tools and methods used by NVTA to effectively disseminate information to Title VI groups and the larger community include:

- Implementing the language assistance measures outlined in the 2019⁷ NVTA Plan for LEP Populations (Appendix 1)
- Translation of NVTA key website pages, documents and reports
 - [Information in Spanish and Filipino and links for users about browser translation were Google Translate was offered for a website translations](#) on the website
- Making translators available at public meetings and events
 - NVTA brought a Spanish-speaking employee to events targeting Spanish-speaking audiences and two members of the NVTA Board of Directors are fluent Spanish speakers who offered translation as necessary at Board meetings.
- Using translation services for responses to individual public requests and service inquiries
- Including contact information for translation requests on all printed material
- Use of local bilingual radio, television and newspaper advertising
 - NVTA advertised in a Voz Bilingual newspaper for large public meetings
- Distribution of translated or bilingual collateral materials to local CBOs and community agencies
- Use of social media tools and resources
 - NVTA had active Facebook, Instagram and Twitter accounts
- Participation in local community events
- Hosting of public meetings at appropriate community venues

C. RECOMMENDED STRATEGIES

Pursuant to Title VI regulatory guidance, NVTA will continue to take reasonable steps to provide meaningful access to underserved populations identified within their service area. This includes ongoing efforts to improve access and opportunities for involvement in the identification of social, economic, and environmental impacts of proposed transportation decisions and programs. All public participation activities normally provided in English will continue to be made available to low-income, minority and LEP populations, using the methods and tools deemed most effective for reaching those audiences, including:

- Continued implementation of the 2019⁷ NVTA Plan for LEP Populations and training for NVTA operations, driver and customer service staff on key plan components

- Expanded use of local and regional bilingual radio, television and newspaper advertising
- Continued use of translators and translated materials
- Expansion and continued use of the NVTA's contact database of CBO and other community-focused organizations to maintain open communication, provide input and receive feedback
- Increased use of graphic signage and visually enhanced materials
- Increased use of website applications, posting of website notices and links to information
- Continued posting and distribution to local CBOs, churches, schools, libraries, cultural and community centers and service agency representatives of bilingual flyers, postcards and brochures
- Increased participation in community events
- Continued hosting of public meetings

NVTA also plans to distribute copies of the agency's Public Participation Plan in English, Spanish and Filipino. In addition, NVTA will draft and implement project-specific public participation plans for any major projects or initiatives conducted by the agency. These plans will take into account the audiences affected by the project or initiative, their communication needs, as well as the strategies listed above.

5. PERFORMANCE METRICS AND GOALS

A. MONITORING AND RECORDING

NVTA is committed to accountability and transparency throughout its operations. NVTA staff will continue to monitor and track public participation methods and make the results of those efforts available for review. Complaints, comments, and suggestions from Title VI individuals or groups will be monitored and tracked by designated NVTA staff.

NVTA has collected some existing information about the reach and effectiveness of its current methods and will continue to expand and use that information to improve access, programs and services. Some of the measurable objectives that the NVTA currently tracks or will implement as resources permit, include:

- Regular updates to contacts in the community partners database and outreach to low-income, minority and LEP individuals
 - NVTA currently communicates, collaborates, and coordinates with a host of social service organizations in Napa County including:
 - Queens Carriage, Queen of the Valley Hospital, Napa CA
 - Molly's Angels, non-profit volunteers, Napa CA
 - Adult Day Services, day program center in Napa CA
 - Napa Valley Support Services, day program center & employer, Napa CA
 - Davila Dialysis, Napa CA
 - Napa Valley Dialysis Center, Napa CA
 - PSI, work center for disabled individuals, Napa CA
 - CARE, support network for Queen of the Valley Hospital, Napa CA
 - Napa Valley Family Services, Napa CA
 - Napa Valley Community Housing, Napa CA



- Vine Village, day program, Napa CA
- Napa Valley Volunteer Center, Napa CA
- Clinic Ole & Sister Mary Ann's, low income medical clinic, Napa & Calistoga, CA
- ~~St. Helena Hospital, Deer Park CA~~
- Napa Senior Center, Napa CA
- ~~Golden Living Center, nursing home, Napa CA~~
- Napa Nursing Valley Care Center, nursing home, Napa CA
- American Cancer Society, Napa CA
- North Bay Regional Center (NBRC), Napa CA
- Napa County HHSA, Napa CA
- Department of Rehabilitation, Napa CA
- Napa Valley Unified School District, Napa CA
- Napa Valley Low Vision Support Group, Napa CA
- Womens Center of St. Helena, St. Helena CA
- Aldea, family services, Napa CA
- Napa County Public Authority, In-Home Supportive Services, Napa CA
- Napa Valley College, adaptive PE classes, Napa CA
- Tracking the number and percentage of comments or feedback received in languages other than English
 - NVTA ~~has been tracking~~ tracks all inquiries, comments, and complaints and since 2018 has been using a customer service program called HappyFox for this purpose. beginning in FY 2016-2017. Prior to that point, NVTA was only tracking service and shelter requests. There have been 23 submissions in FY 2016-2017 so far and an additional 305 submissions in 2015-2016. Of all of the submissions between FY 2015-2017, only six were in Spanish. In 2017, NVTA received 135 submissions, 144 submissions in 2018 and in 2019 through October 15, 2019 a total of 155 submissions. The physical comment cards are available in Spanish, and there is the option to submit online in Spanish. All submission received were translated into English and responses were given in Spanish as long as contact information was provided. Off all of the submissions over period January 1, 2017 to October 15, 2019, only 13 were in Spanish and none in Filipino.
- Tracking the number and type of Title VI public complaints that the NVTA staff receive via phone, email and in-person visits

B. PUBLIC PARTICIPATION OUTCOMES

The Title VI Public Participation Plan is designed to identify opportunities for greater community involvement through implementation of thoughtful outreach methods and all tools available. These strategies will be applied with the goal of engaging the greatest possible number of residents and visitors, based on available resources and recognition of the unique characteristics, strengths and challenges of the Napa County transportation service area.

As NVTA increases its efforts to solicit involvement from these Title VI-qualifying communities, the agency hopes to see increased engagement from diverse community members. Ongoing engagement and participation will foster a two-way dialogue between transit providers and transit users, leading to improved efficiency and service. NVTA will be able to better serve its customers and its customers will realize greater benefits from the use of NVTA's services.



TITLE VI Compliant Form

(Also available in Spanish and Filipino languages)

Title VI of the Civil Rights Act of 1964 states "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

Title 42 U.S.C. Section 2000d

Please provide the following information necessary in order to process your complaint. A formal complaint must be filed within 180 days of the occurrence of the alleged discriminatory act. Assistance is available upon request. Please contact NVTA at (707) 259-8631.

Complete this form and return to:

Civil Rights Officer
Napa Valley Transportation Authority
625 Burnell Street
Napa, CA 94559

Complainant's Name:

Address: City:

State: Zip Code:

Telephone (Home): (Work):

Person(s) discriminated against (if other than complainant)

Name:

Address: City:

State: Zip Code:

Telephone (Home): (Work):

What is the discrimination based on?

- Race/Color National Origin



Date of the alleged discrimination: Location:

Agency or person that who was responsible for alleged discrimination:

Describe the alleged Discrimination. Explain what happened and whom you believe was responsible (for additional space, attach additional sheets of paper to this form.

List names and contact information of persons who may have knowledge of the alleged discrimination.

How can this complaint be resolved? How can the problem be corrected?

Please sign and date. The complaint will not be accepted if it is has not been signed. You may attach any written materials or other supporting information that you think is relevant to your compliant.

Signature

Date





TITULO VI Form Para sa Reklamo

(Mababasa rin sa wikang Espanyol at Filipino)

Isinasaad ng Titulo VI ng Batas sa Karapatang Sibil (Civil Rights Act) ng 1964 na "Walang sinuman sa Estados Unidos ang, sa batayan ng lahi, kulay, o bansang pinagmulan, ang hindi isasama sa pakikilahok sa, tatanggihan ng mga benepisyo, o mapapasailalim sa diskriminasyon sa ilalim ng anumang programa o aktibidad na tumatanggap ng pinansyal na tulong mula sa Pederal."

Titulo 42 U.S.C. Seksyon 2000d

Mangyaring ibigay ang sumusunod na impormasyon na kinakailangan upang maproseso ang iyong reklamo. Dapat ihain ang isang pormal na reklamo sa loob ng 180 araw mula sa kaganapan ng sinasabing pagkilos na nandiskrimina. Makakakuha ng tulong kapag hiniling. Mangyaring makipag-ugnayan sa NVTA sa (707) 259-8631.

Kumpletuhin ang form na ito at ibalik sa:

Civil Rights Officer
Napa Valley Transportation Authority
625 Burnell Street
Napa, CA 94559

Pangalan ng Nagrereklamo:

Address:

Lungsod:

Estado:

Zip Code:

Telepono (Bahay):

(Trabaho):

(Mga) taong nadiskrimina (kung maliban sa nagrereklamo)

Pangalan:

Address:

Lungsod:

Estado:

Zip Code:

Telepono (Bahay):

(Trabaho):

Saan nakabatay ang diskriminasyon?

Lahi/Kulay

Bansang Pinagmulan



Petsa ng sinasabing diskriminasyon:

Lokasyon:

Ahensya o tao na responsable sa sinasabing diskriminasyon:

Ilarawan ang sinasabing Diskriminasyon. Ipaliwanag kung ano ang nangyari at sino sa tingin mo ang responsable (para sa karagdagang espasyo, maglakip ng karagdagang papel sa form na ito.

Ilista ang mga pangalan at impormasyon sa pakikipag-ugnayan ng mga taong maaaring may alam tungkol sa sinasabing diskriminasyon.

Paano malulutas ang reklamong ito? Paano maiwawasto ang problema?

Mangyaring pirmahan at lagyan ng petsa. Hindi tatanggapin ang reklamo kung hindi ito napirmahan. Maaari kang maglakip ng anumang mga nakasulat na materyales o iba pang pansuportang impormasyon na sa tingin mo ay may kaugnayan sa iyong reklamo.

Lagda

Petsa





TITLE VI Formulario De Queja

(También disponible en ingles and filipino)

Título VI del Acto de Derechos Civiles de 1964 declara "ninguna persona en los Estados Unidos, con base en su raza, color, u origen nacional, será excluida de participar, negada beneficios, o sujeta a discriminación en cualquier programa o actividad que reciba ayuda financiera federal".

Title 42 U.S.C. Section 2000d

Por favor, proporcione la siguiente información necesaria para procesar su queja. Una queja formal debe ser presentada dentro de los 180 días de la ocurrencia del supuesto acto discriminatorio. Asistencia disponible bajo petición. Por favor contactar a NVRTA al (707) 259-8631.

Complete este formulario y regrese a:

Civil Rights Officer
Napa Valley Transportation Authority
625 Burnell Street
Napa, CA 94559

Nombre de la persona que presenta la queja:

Dirección:

Ciudad:

Estado:

Código Postal:

Teléfono (Casa):

(Trabajo):

Persona que sufrió la discriminación (en caso de no ser la misma que presenta la queja):

Nombre:

Dirección :

Ciudad:

Estado:

Código Postal:

Teléfono (Casa):

(Trabajo):

¿En qué se basa la discriminación?

Raza/Color

País de origen



Fecha de la presunta discriminación: Ubicación:

Agencia o persona que fue responsable de la presunta discriminación:

Describa la supuesta discriminación. Explique qué sucedió y quién cree usted que fue responsable. (Para espacio adicional, adjunte hojas de papel adicionales a este formulario).

Enumere los nombres y la información de contacto de las personas que puedan tener conocimiento de la supuesta discriminación.

¿Cómo puede resolverse esta queja? ¿Cómo se puede corregir el problema?

Por favor firme y feche. La queja no será aceptada si no ha sido firmada. Puede adjuntar cualquier material escrito u otra información de apoyo que considere relevante para su cumplimiento.

Firma

Fecha





Systemwide Title VI Service Standards and Policies

In preparation for the Title VI update, the Napa Valley Transportation Authority is required to adopt and then apply Vine Transit's Systemwide Service Standards and Policies to fixed route service. Some of these standards and policies already exist; some need updating, and some need creating. This document establishes standards to be used in the 2019⁷ Title VI Plan and will supersede those previously adopted. The required Title IV standards are:

- System-wide Service Standards
 - a. Vehicle Load
 - b. Vehicle Headways
 - c. On-time Performance
 - d. Service Availability

- System-wide Service Policies
 - a. Vehicle Assignment
 - b. Transit Amenities

Systemwide Service Standards

Vehicle Load Factor is described as follows by FTA Circular 4702.1B:

Vehicle load can be expressed as the ratio of passengers to the total number of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. A vehicle load standard is generally expressed in terms of peak and off-peak times.

Vine Calculates vehicle load factor based on the following performance measures and standards:

Fixed Route: Less than 1.5 in peak for local service, less than or equal to 1.0 in off peak for local service. All commuter services should be equal to or less than 1.0 during all times of day.

Paratransit: Never exceed 1.0

Community Shuttles: Less than 1.5 in peak for local service, less than or equal to 1.0 in off peak.

Vehicle Load Factor is monitored regularly and used to determine whether additional capacity needs to be added to specific trips or routes based on changing demand patterns.

Vehicle Headway is described as follows by FTA Circular 4702.1B:

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds to more frequent service. Vehicle headways are measured in minutes (e.g., every 15 minutes). Headways and frequency of service are general indications of the level of service provided along a route. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination.

Vine Routes 1 – 8 provide service to the residents of the City of Napa. The majority of these routes are deployed in one way loops creating a coverage based system ensuring that most residents are within walking distance of fixed route transit. On weekdays Routes 2 – 5, 7, and 8 operate on half hourly headways while the Routes 1 and 6 run every forty-five minutes. On Saturdays all local routes run every forty-five minutes with no service on Sundays. [NVTA is planning changes on the local Vine routes, currently 1-8, in January 2020. The new routes will be renamed routes A through H and the routes will be more bidirectional in nature. These changes are the result of a three year Comprehensive Operational Analysis \(COA\) that evaluated the transit system using projections on ridership demand, geographic and changes and advances in technology. A Title VI analysis was performed on these route changes prior to implementation.](#)

Vine intercity Routes 10 and 11 operates between the communities in the County of Napa as well as the City of Vallejo. The Route 10 runs from the City of Calistoga in northern Napa County to the Napa Valley College (NVC) campus in the south part of the City of Napa. The Route 11 runs from the Redwood Park and Ride Lot in the northern part of the City of Napa to the City of Vallejo serving the Vallejo Ferry Terminal, the Vallejo Transit Center in downtown, and Kaiser Vallejo. These routes intersect in the City of Napa along the main corridors of Soscol Avenue and Trancas Street. Each service runs on hourly headways but Route 10 and 11 schedules are staggered in order to operate at a minimum of half hour frequencies between Napa Valley College and Redwood Park and Ride during peak periods. Service is provided Sunday through Saturday with more limited service on the weekends. [In 2019, the Vine also introduced the express routes 10X and 11X which travel the same corridor with fewer stops during commute hours on the weekdays.](#)

On-Time Performance is described as follows by FTA Circular 4702.1B:

On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered to be “on time.” For example, a transit provider may consider it acceptable if a vehicle completes a scheduled run between zero and five minutes late in comparison to the established schedule. On-time performance can be measured against route origins and destinations only, or against origins and destinations as well as specified time points along the route. Some transit providers set an on-time performance standard that prohibits vehicles from running early (i.e., ahead of schedule) while others allow vehicles to run early within a specified window of time (e.g., up to five minutes ahead of schedule). An acceptable level of performance must be defined (expressed as a percentage). The percentage of runs completed system-wide or on a



particular route or line within the standard must be calculated and measured against the level of performance for the system.

Vine Transit defines a bus as late if it departs the “time point” five (5) or more minutes later than the published time. Buses are considered early if they depart from a published time point at any time prior to the scheduled departure.

Current Standard: Vine Transit has an adopted on-time performance goal of 90 percent. On-time performance is tracked and included within monthly performance reports to the Vine Transit’s Board of Directors.

Service Availability is described as follows by FTA Circular 4702.1B:

Service availability is a general measure of the distribution of routes within a transit provider’s service area. For example, a transit provider might set a service standard to distribute routes such that a specified percentage of all residents in the service area are within a one-quarter mile walk of bus service or a one-half mile walk of rail service. A standard might also indicate the maximum distance between stops or stations. These measures related to coverage and stop/station distances might also vary by population density.

Vine Transit determines transit service availability by mapping all active bus stops within the system and then calculating the population that resides within three-quarter mile radii of those stops. This information is then compared to the total service area population.

Systemwide Service Policies

The FTA requires fixed-route transit providers to develop a policy for each of the following service indicators. The following policies differ from service standards in that they are not based on meeting a quantitative threshold, but rather qualitative evaluation results.

Vehicle Assignment is described as follows by FTA Circular 4702.1B:

Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider’s system. Policies for vehicle assignment may be based on the age of the vehicle, where age would be a proxy for condition. For example, a transit provider could set a policy to assign vehicles to depots so that the age of the vehicles at each depot does not exceed the system-wide average. The policy could also be based on the type of vehicle. For example, a transit provider may set a policy to assign vehicles with more capacity to routes with higher ridership and/or during peak periods.

Vine Transit currently has four (4) general types of fixed-route buses in the fleet, all of which are maintained to the same strict standards:

- 28-foot medium-duty transit buses
- 30-foot heavy-duty transit buses
- 35-foot heavy-duty transit buses



● 40-foot heavy-duty transit buses

Proposed Policy: All buses have the same level of amenities (i.e. air conditioning, wheelchair lifts, automated stop announcements, bike racks), available to riders. Buses are not assigned to specific communities within Vine Transit's service area based on vehicle age, but rather to serve specific routes that call for vehicles of differing lengths based street limitations. Many of the routes serve multiple communities with diverse populations. Given Vine Transit's strict standards with respect to maintenance, age does not serve as a viable proxy for diminished quality.

Transit Amenities are described as follows by FTA Circular 4702.1B:

Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Fixed-route transit providers must set a policy to ensure equitable distribution of transit amenities across the system. Policies in this area address how these amenities are distributed within a transit system, and the manner of their distribution determines whether transit users have equal access to these amenities. This...is not intended to impact funding decisions for transit amenities. Rather, this...applies after a transit provider has decided to fund an amenity.

Proposed Policy: Transit amenities are distributed on a system-wide basis. Transit amenities include shelters, benches, and real time signage. The location of transit amenities is determined by factors such as ridership, individual requests, staff recommendations, and vendor preference (in the case of shelters which feature advertisements).



Napa County Short Range Transit Plan

FY 2016-2026



Chapter 3: Goals, Objectives, & Standards

1.1 Process for Establishing, Reviewing, and Updating Goals, Objectives, and Standards

Goals, objectives, and standards for Vine fixed route, VineGo paratransit, and NVTA's community shuttles are reviewed on an annual basis, in conjunction with updating the Short Range Transit Plan. Goals and objectives as stated in the short range transit plan provide the agency with a concrete and consistent direction of operating and improving upon its transit services.

Performance against adopted service standards is evaluated on a quarterly and annual basis. This review allows planning staff to react to poor performance and develop an action plan to remediate any deficiencies. Monthly reports are also produced to measure performance of the system to help staff and board members make informed decisions. These reports do not cover all standards set forth in this SRTP; however they do cover the key performance indicators as outlined in Chapter 2.

1.2 Napa Valley Transportation Authority Goals

NVTA staff has developed the following goals:

1. Provide high-quality transit services.
2. Operate safe, comfortable, and reliable services.
3. Efficiently use NVTA resources.
4. Be a forward-thinking organization meeting the needs of an evolving and diverse community.

1.3 Napa Valley Transportation Authority Objectives

The sixteen (16) objectives below were developed to support the achievement of the goals stated in the previous section. NVTA has elected to present them as a group, rather than listing specific objectives under each goal recognizing that an individual objective can correlate to multiple goals. NVTA's objectives for planning, funding, and delivery of Vine services as part of a multi-modal transportation system in the County of Napa are:

Objective 1: Provide transit services that are cost-efficient.

Objective 2: Provide transit services that are reliable.

Objective 3: Provide transit services that are safe and secure.

Objective 4: Provide transit services that are convenient.

Objective 5: Provide transit services that are comfortable.



Objective 6: Provide transit services that are an attractive option for individuals who have other transportation mode options available to them.

Objective 7: Design service to better coordinate with other operators inside and outside of Napa County

Objective 8: Deploy all services in the most efficient manner possible.

Objective 9: Maintain fleet and facilities in a constant state of good repair.

Objective 10: Strive to replace fleet vehicles at the end of their useful life.

Objective 11: Attempt to utilize alternative fuel vehicles where financially and operationally feasible.

Objective 12: Monitor financial and performance data on a monthly, quarterly, and annual basis.

Objective 13: Ensure compliance with all local, state, and federal regulations.

Objective 14: Ensure the consideration of transit needs in all local land use decisions.

Objective 15: Promote partnerships with other organizations to support common interests and goals.

Objective 16: Promote public participation in service planning decisions.

1.4 Napa Valley Transportation Authority Measures and Performance Standards

The following tables will outline what goals NVTA's measures and performance standards fall under and which objective or objectives they coincide with. The performance standards consist of both qualitative and quantitative definitions of acceptable performance. Actual performance is measured against these standards on a monthly, quarterly, and annual basis. This amount of review allows staff to be more proactive in ensuring the Vine services are operating at maximum efficiency.



1.4.1 Goal 1 – Provide High Quality Transit Services

In order to meet the mobility needs of the residents of Napa County, NVTA strives to implement the highest quality transit services possible. The measures and performance standards ensure that NVTA can monitor and responded to any deficiencies that may be the outcome of poor quality of service.

Table 3-1: Goal 1 Performance Measures & Standards

Measure	Standard	Objective(s)
Total Ridership	Fixed Route: Increase over prior fiscal year Paratransit: Growth should not lead to denials Community Shuttles: Growth should not lead to excessive wait times	2, 3, 4, 5, 6, 7, 8, 12, 15, & 16
Passengers per Revenue Vehicle Hour	Fixed Route: Greater than 80% of system average Paratransit: Greater than 2.0 Community Shuttles: Greater than 4.0	2, 3, 4, 5, 6, 7, 8, 12, 15, & 16
Load factor	Fixed Route: Less than 1.5 in peak for local service, less than or equal to 1.0 in off peak for local service. All commuter services should be equal to or less than 1.0 during all times of day. Paratransit: Never exceed 1.0 Community Shuttles: Less than 1.5 in peak for local service, less than or equal to 1.0 in off peak.	2, 3, 4, 5, 6, 7, 8, 12, 15, & 16
Percent Missed Trips per Trip Miles	Fixed Route: Less than .01% Paratransit: 0% Community Shuttles: Less than .01%	2, 3, 4, 5, 6, 7, 8, 15, & 16
Scheduled On-Time Arrivals	Fixed Route: Equal or greater than 90% on-time Paratransit: Equal or greater than 97% on-time Community Shuttles: 90% of service will arrive within 30 minutes of request for service.	2, 4, 6, & 12
Passenger Injuries	All Modes: Less than 1 per 100,000 passenger trips	3, 9, & 10
Preventable Accidents	All Modes: Less than 1 per 100,000 revenue miles	3, 9, & 10
Complaints	Fixed Route: Less than 1 per 100,000 revenue miles Paratransit: No more than 1 complaint for every 600 passenger trips. Community Shuttles: Less than 1 per 5,000 revenue miles	2, 3, 4, 5, 6, 7, 9, 14, 15, & 16
Percent of Trips Denied	Paratransit: 0%	2, 4, 7, 8, & 16



Measure	Standard	Objective(s)
Cleanliness of Buses	Interiors and exteriors cleaned daily	2, 3, 5, 6, & 9
Proximity to Service	Fixed Route: 95% of dwelling units in areas having six or more units per acre to be located with 1-4 mile of a stop, all major destinations to be within 1-8 of a mile of a stop. Paratransit: Service will be available to all qualifying residents of Napa County with residences, destinations, or the ability to find alternate means to come within 3-4 of a mile from Vine fixed route service.	1, 2, 3, 4, 5, 6, 8, & 16
Frequency of Service	Fixed Route: Frequency of service should never be more than one bus per hour for local and intercity buses. Commuter service frequency should never be more than one bus per one and half hours. System average should be 45 minutes or less.	1, 2, 4, 5, 6, 7, 8, & 16
Percentage of ADA Accessible Stops	100% of all new stops shall be ADA accessible, existing stops should be made accessible to the greatest extent possible.	2, 3, 4, 5, 6, 9, & 16
Bus Stop Amenities	Stops which average 50 or more riders a day should have a shelter installed if feasible.	3, 4, 5, 6, & 8
Trip length	Paratransit: Trips should not exceed 1.25 times that of an equivalent trip on fixed route transit.	2, 4, 5, 6, & 8



1.4.2 Goal 2 – Operate Safe, Reliable, and Comfortable Service

Safe, reliable, and comfortable service are NVTAs’s top priorities. Promoting safe habits for drivers and delivering service people want to use benefits the agency as well as the community.

Table 3-2: Goal 2 Performance Measures & Standards

Measure	Standard	Objective(s)
Average Age of Fleet by Vehicle Type	Fixed Route: Average age should not exceed 12 years. Paratransit: Average age should not exceed 4 years. Community Shuttles: Average age should not exceed 4 years.	1, 2, 3, 5, 8, 9, 10, & 13
Average Mileage of Fleet by Vehicle Type	Fixed Route: Average should not exceed 500,000 miles. Paratransit: Average should not exceed 100,000 miles. Community Shuttles: Average should not exceed 100,000 miles.	1, 2, 3, 5, 8, 9, 10, & 13
Scheduled On-Time Arrivals	Fixed Route: Equal or greater than 90% on-time Paratransit: Equal or greater than 97% on-time Community Shuttles: 90% of service will arrive within 30 minutes of request for service.	2, 4, 6, & 12
Passenger Injuries	All Modes: Less than 1 per 100,000 passenger trips	3, 9, & 10
Preventable Accidents	All Modes: Less than 1 per 100,000 revenue miles	3, 9, & 10
Complaints	Fixed Route: Less than 1 per 100,000 revenue miles Paratransit: No more than 1 complaint for every 600 passenger trips. Community Shuttles: Less than 1 per 5,000 revenue miles	2, 3, 4, 5, 6, 7, 9, 14, 15, & 16
Percent of Trips Denied	Paratransit: 0%	2, 4, 7, 8, & 16
Cleanliness of Buses	All Modes: Interiors and exteriors cleaned daily	2, 3, 5, 6, & 9
Percent Missed Trips per Trip Miles	Fixed Route: Less than .01% Paratransit: 0% Community Shuttles: Less than .01%	2, 3, 4, 5, 6, 7, 8, 15, & 16
Preventative Maintenance Work Completed On-Time	Greater than 99%	1, 2, 3, 5, 8, 9, 10, & 13
Vehicle Service Miles Between Road Calls	Greater than 25,000 miles	1, 2, 3, 5, 8, 9, 10, & 13



Measure	Standard	Objective(s)
Load factor	<p>Fixed Route: Less than 1.5 in peak for local service, less than or equal to 1.0 in off peak for local service. All commuter services should be equal to or less than 1.0 during all times of day.</p> <p>Paratransit: Never exceed 1.0</p> <p>Community Shuttles: Less than 1.5 in peak for local service, less than or equal to 1.0 in off peak.</p>	2, 3, 4, 5, 6, 7, 8, 15, & 16
Frequency of Service	<p>Fixed Route: Frequency of service should never be more than one bus per hour for local and intercity buses. Commuter service frequency should never be more than one bus per one and half hours. System average should be 45 minutes or less.</p>	1, 2, 4, 5, 6, 7, 8, & 16
Percentage of ADA Accessible Stops	<p>100% of all new stops shall be ADA accessible, existing stops should be made accessible to the greatest extent possible</p>	2, 3, 4, 5, 6, 9, & 16
Bus Stop Amenities	<p>Stops which average 50 or more riders a day should have a shelter installed if feasible.</p>	3, 4, 5, 6, & 8
Trip length	<p>Paratransit: Trips should not exceed 1.25 times that of an equivalent trip on fixed route transit.</p>	2, 4, 5, 6, & 8



1.4.3 Goal 3 – Efficiently Use of Resources

NVTA strives to use its resources in an efficient and responsible manner. Ensuring needs are met and budgets are not overrun are two of NVTA's top financial goals.

Table 3-3: Goal 3 Performance Measures & Standards

Measure	Standard	Objective(s)
Total Ridership	Fixed Route: Increase over prior fiscal year Paratransit: Growth should not lead to denials Community Shuttles: Growth should not lead to excessive wait times	2, 3, 4, 5, 6, 7, 8, 12, 15, & 16
Passengers per Revenue Vehicle Hour	Fixed Route: Greater than 80% of system average Paratransit: Greater than 2.0 Community Shuttles: Greater than 4.0	2, 3, 4, 5, 6, 7, 8, 12, 15, & 16
Subsidy per Passenger	Fixed Route: At or less than \$6.50 Paratransit: At or less than \$40 Community Shuttles: At or less than \$15	1, 8, & 12
Operating Cost per Service Hour	Fixed Route: At or less than \$60	1, 8, & 12
Operating Cost per Revenue Hour	Paratransit: At or less than \$90 Community Shuttles:	1, 8, & 12
Operating Cost per Passenger	Fixed Route: At or less than \$4.50 Paratransit: At or less than \$24 Community Shuttles: At or less than \$75	1, 8, & 12
Farebox Recovery Ratio	Fixed Route: Meet or exceed 15%. Paratransit: Meet or exceed 10%. Community Shuttles: Meet or exceed 10%.	1, 6, 7, 8, 12, & 14
Load factor	Fixed Route: Less than 1.5 in peak for local service, less than or equal to 1.0 in off peak for local service. All commuter services should be equal to or less than 1.0 during all times of day. Paratransit: Never exceed 1.0 Community Shuttles: Less than 1.5 in peak for local service, less than or equal to 1.0 in off peak.	2, 3, 4, 5, 6, 7, 8, 15, & 16
Percent Missed Trips per Trip Miles	Fixed Route: Less than .01% Paratransit: 0%	2, 3, 4, 5, 6, 7, 8, 15, & 16



Measure	Standard	Objective(s)
	Community Shuttles: Less than .01%	
Scheduled On-Time Arrivals	Fixed Route: Equal or greater than 90% on-time Paratransit: Equal or greater than 97% on-time Community Shuttles: 90% of service will arrive within 30 minutes of request for service.	2, 4, 6, & 12
Complaints	Fixed Route: Less than 1 per 100,000 revenue miles Paratransit: No more than 1 complaint for every 600 passenger trips. Community Shuttles: Less than 1 per 5,000 revenue miles	2, 3, 4, 5, 6, 7, 9, 14, 15, & 16
Percent of Trips Denied	Paratransit: 0%	2, 4, 7, 8, & 16
Stop Spacing	Stops should be spaced no closer than 1-4 of a mile and no further than 1-3 of a mile unless infrastructure constraints are present.	1, 4, 6, 7, 8, & 14
Proximity to Service	Fixed Route: 95% of dwelling units in areas having six or more units per acre to be located with 1-4 mile of a stop, all major destinations to be within 1-8 of a mile of a stop. Paratransit: Service will be available to all qualifying residents of Napa County with residences, destinations, or the ability to find alternate means to come within 3-4 of a mile from Vine fixed route service.	1, 2, 3, 4, 5, 6, 8, & 16
Frequency of Service	Fixed Route: Frequency of service should never be more than one bus per hour for local and intercity buses. Commuter service frequency should never be more than one bus per one and half hours. System average should be 45 minutes or less.	1, 2, 4, 5, 6, 7, 8, & 16



1.4.4 Goal 4 – Be a Forward Think Organization Meeting the Needs of an Evolving and Diverse Community

NVTA is always looking for new and useful technology that will make operating the system more efficient as well as attract new riders. By listening to the needs and wants of the community as well as introducing useful tools to the system NVTA will be able to create a strong and vibrant transit system.

Table 3-4: Goal 4 Performance Measures & Standards

Measure	Standard	Objective(s)
Stop Spacing	Stops should be spaced no closer than 1-4 of a mile and no further than 1-3 of a mile in urban areas. Stops located in rural areas will be evaluated on a case by case basis to ensure that ADA accessibility requirements are met and there is a clear and present demand.	1, 4, 6, 7, 8, & 14
Proximity to Service	Fixed Route: 95% of dwelling units in areas having six or more units per acre to be located with 1-4 mile of a stop, all major destinations to be within 1-8 of a mile of a stop. Paratransit: Service will be available to all qualifying residents of Napa County with residences, destinations, or the ability to find alternate means to come within 3-4 of a mile from Vine fixed route service.	1, 2, 3, 4, 5, 6, 8, & 16
Frequency of Service	Fixed Route: Frequency of service should never be more than one bus per hour for local and intercity buses. Commuter service frequency should never be more than one bus per one and half hours. System average should be 45 minutes or less.	1, 2, 4, 5, 6, 7, 8, & 16
Percentage of ADA Accessible Stops	100% of all new stops shall be ADA accessible, existing stops should be made accessible to the greatest extend possible	2, 3, 4, 5, 6, 9, & 16
Bus Stop Amenities	Stops which average 50 or more riders a day should have a shelter installed if feasible.	3, 4, 5, 6, & 8
Average Age of Fleet by Vehicle Type	Fixed Route: Average age should not exceed 12 years. Paratransit: Average age should not exceed 4 years. Community Shuttles: Average age should not exceed 4 years.	1, 2, 3, 5, 8, 9, 10, & 13
Average Mileage of Fleet by Vehicle Type	Fixed Route: Average should not exceed 500,000 miles. Paratransit: Average should not exceed 100,000 miles.	1, 2, 3, 5, 8, 9, 10, & 13



Measure	Standard	Objective(s)
	Community Shuttles: Average should not exceed 100,000 miles.	
Total Ridership	Fixed Route: Increase over prior fiscal year Paratransit: Growth should not lead to denials Community Shuttles: Growth should not lead to excessive wait times	2, 3, 4, 5, 6, 7, 8, 15, & 16
Passengers per Revenue Vehicle Hour	Fixed Route: Greater than 80% of system average Paratransit: Greater than 2.0 Community Shuttles: Greater than 4.0	2, 3, 4, 5, 6, 7, 8, 15, & 16
Maintain an up-to-date list of stakeholders	Contact individuals and organizations yearly to ensure information is up-to-date on contact list.	14, 15, & 16
Implement Public Outreach in Accordance with the Title VI Public Participation Plan	Complete check-list of required processes in accordance with Title VI Public Participation Plan prior to an outreach event.	15 & 16
Land Use Coordination	Comment on all design referrals with obvious transit nexus. Ensure participation on any TAC for major local land use projects	14, 15, & 16



Title VI Notice to the Public

The Napa Valley Transportation Authority (Vine Transit) grants all citizens equal access to its transportation services in Napa County. NVTA and Vine Transit is committed to a policy of nondiscrimination in the conduct of its business, including its responsibilities under Title VI of the Civil Rights Act of 1964 which provides that no person shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under its program of transit services delivery. To request additional information on NVTA's Title VI obligations contact at 707-259-8631 or at the 'Contact Us' tab on www.ridethevinevinetransit.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 If information is needed in another language, contact 707-259-8631

Title VI Complaint Procedures

If you believe that you have received discriminatory treatment based on race, color or national origin with regard to transit services delivery, you have the right to file a Title VI complaint with the Authority's Civil Rights Administrator. Federal and State laws require complaints to be filed within one-hundred and eighty (180) calendar days of the last alleged incident. You may download a complaint form by visiting www.nvta.ca.gov or www.vinetransit.com. You may also call customer service and ask for a Title VI complaint form to be mailed to you. You may also submit a written statement that contains all the information listed below. Complaints should be mailed or delivered to:

Napa Valley Transportation Authority
Civil Rights Officer
625 Burnell St.
Napa, CA 94559

All complaints should include the following information:

1. Name, address, and telephone number of the complainant.
2. The basis of the complaint; (e.g, race, color, or national origin).
3. The date(s) on which the alleged discriminatory event occurred.
4. The nature of the incident that led the complainant to feel discrimination was a factor.
5. Names, addresses and telephone numbers of persons who may have knowledge of the event.
6. Other agencies or courts where complaint may have been filed and a contact name.

Declaración de la Política

La Autoridad de tránsito de Napa Valley Transportation Authority (Vine Transit) otorga a todos los ciudadanos igual acceso a sus servicios de transporte en Napa Valley Transportation Authority. Vine Transit está comprometida con una política de no discriminación al llevar a cabo sus negocios, incluso sus responsabilidades bajo el Título VI de la Ley de Derechos

Civiles de 1964, la cual establece que ninguna persona deberá, con base en su raza, color de piel o país de origen, ser excluida de participar, que se le nieguen, beneficios o estar sujeta a discriminación bajo su programa de prestación de servicios de tránsito. Para solicitar información adicional sobre las obligaciones del Título VI de NVTA, comuníquese al 707-259-8631 o en la pestaña "Contáctenos" www.ridethevinevinetransit.com

Un demandante puede presentar una queja directamente ante la Administración Federal de Tránsito al presentar una queja ante la Oficina de Derechos Civiles,

Atención: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590. Si necesita la información en otro idioma, comuníquese llamando al 707-259-8631

Procedimientos de cumplimiento del Título VI

Si considera que ha sido tratado de forma discriminatoria con base en la raza, el color de piel o el país de origen en relación con la prestación de los servicios de tránsito, tiene derecho a presentar una queja del Título VI ante el Administrador de Derechos Civiles de la Autoridad. Las leyes federales y estatales requieren que las quejas se presenten en un plazo de ciento ochenta (180) días calendario del supuesto incidente. Puede descargar una queja al visitar www.nvta.ca.gov o www.vinetransit.com. También puede llamar a servicios al cliente y pedir que le envíen por correo un formulario de quejas del Título VI.

También puede enviar una declaración por escrito que contenga toda la información que se indica a continuación. Las quejas se deben enviar por correo o entregarlas en:

Napa Valley Transportation Authority
Civil Rights Officer
625 Burnell St.
Napa, CA 94559

Todas las quejas deben incluir la información siguiente:

1. Nombre, dirección y número de teléfono del demandante
2. El fundamento de la queja (p. ej. raza, color de la piel o país de origen).
3. La fecha en la que ocurrió el supuesto suceso de discriminación.
4. La naturaleza del incidente que causó que el demandante considerara que la discriminación era un factor.
5. Nombres, direcciones y números de teléfono de las personas que podrían tener conocimiento del suceso.
6. Otras agencias o tribunales en donde el demandante podría haber presentado la queja y un nombre de contacto.

Pahayag ng Patakarán

Pinagkakalooban ng Napa Valley Transportation Authority (Vine Transit) ang lahat ng mamamayan ng pantay-pantay na akses sa mga serbisyo nito ng transportasyon sa Central Contra Costa. Dedicado ang Vine Transit sa patakarang walang-diskriminasyon sa pagpapatakbo ng negosyo nito, kabilang ang mga responsibilidad nito sa ilalim ng Title VI ng Civil Rights Act of 1964 na nagsasaad na dapat ay walang tao, na hindi pahihintulutan sa pakikilahok, pagkakaitan ng mga benepisyo, o sasailalim ng diskriminasyon sa ilalim ng programa nito sa paghahatid ng mga serbisyong transportasyon dahil sa kanyang lahi, kulay o bansang pinagmulan. Upang humiling ng karagdagang impormasyon tungkol sa mga obligasyon sa Title VI ng NVRTA sa 707-259-8631 o sa tab na 'Makipag-ugnay sa Amin' sa www.ridethevinevinetransit.com

Ang isang nagrereklamo ay maaaring direktang maghain ng reklamo sa Federal Transit Administration sa pamamagitan ng paghahain ng reklamo sa Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590. Kung kinakailangan ang impormasyon sa iba pang wika, makipag-ugnayan sa 707-259-8631.

Mga Pamamaraan ng Reklamo ukol sa Title VI

Kung naniniwala kang nakatanggap ka ng pakikitungong may-diskriminasyon batay sa lahi, kulay o bansang pinagmulan kaugnay sa paghahatid ng mga serbisyong transportasyon, may karapatan kang maghain ng reklamo sa Title VI sa Civil Rights Administrator ng Authority. Hinihingi ng mga batas na Pederal at Pang-estado na ihain ang mga reklamo sa loob ng isangdaan at walumpung (180) araw sa kalendaryo mula sa sinasabing insidente. Maaari mong i-download ang form para sa paghain ng reklamo sa pamamagitan ng pagbisita sa www.nvta.ca.gov o www.vinetransit.com. Maaari ka ring tumawag sa customer service at hilinging mapadalhan ka sa koreo ng form ng reklamo sa Title VI. Maaari mo ring isumite ang isang nakasulat na pahayag na naglalaman ng lahat ng impormasyong nakalista sa ibaba. Dapat ipakoreo o ipahatid ang mga reklamo sa:

Napa Valley Transportation Authority
Civil Rights Officer
625 Burnell St.
Napa, CA 94559

Dapat kasama sa lahat ng reklamo ang mga sumusunod na impormasyon:

1. Pangalan, address, at numero ng telepono ng nagrereklamo.
2. Ang batayan ng reklamo; (hal., lahi, kulay, o bansang pinagmulan).
3. Ang (mga) petsa kung kailan nangyari ang sinasabing pangyayaring may diskriminasyon.
4. Ang uri ng insidente na nagbigay-daan upang maramdaman ng nagrereklamo na isang salik ang diskriminasyon.
5. Mga pangalan, address at numero ng telepono ng mga taong maaaring may alam sa pangyayari.
6. Iba pang ahensiya o hukuman kung saan maaaring inihain ang reklamo at pangalan ng nakaugnayan.



List of Transit-Related Title VI Investigations, Complaints and Lawsuits

In order to comply with the requirements of Circular 4702.1B, FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by the entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date that the investigation, lawsuit, or complaint was filed; summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint.

IN 2018, the Napa Valley Transportation Authority started using a customer service platform called HappyFox to log, track and respond to all suggestions, complaints and questions. Napa Valley Transportation Authority has not received any Title VI Investigations or Lawsuits since the submission of its last Title VI Program. -The NVTA did receive two complaints in 2014-2018 and 2019 as outlined below. No complaints were received in 2015 or 2016-2017. Below is the list used for tracking these incidents:

Title VI Investigations, Lawsuits and Complaints

	Date (Month, Day, Year)	Summary (Include basis of complaint: race, color, or national origin)	Status	Action Taken
Investigations				
1.	N/A			
Lawsuits				
1.	N/A			
Complaints				
1.	<u>11/14/2018</u>	<u>Title VI complaint was filed against the Vine Transit Service for allegedly not protecting the safety of a developmentally disabled</u>	<u>Closed</u>	<u>The complaint was reviewed by NVTA Staff and Legal Counsel. It was determined that is</u>



APPENDIX 6

		<p><u>passenger. Claimant stated that the driver has been undertrained on passengers with developmental disabilities and requested driver training materials. The claimant indicated the need for more [driver] education and understanding of the growing population of adults with disabilities, especially autism.</u></p>		<p><u>was not a violation of Title VI of the Civil Rights Act of 1964 as it did not exclude the passenger from participation in, or denied benefits of, transit services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964. Complaint was denied.</u></p>
2.	<u>09/30/2019</u>	<p><u>Title VI complaint, submitted through the Vine HappyFox application, was filed against a bus driver who, allegedly, was rude, disrespectful, and acted aggressively towards the onboard passengers, who were students from one of the local high schools. The claimant stated that the bus ride felt very uncomfortable and requested that another driver be assigned to the route.</u></p>	<u>Closed</u>	<p><u>The complaint was reviewed by NVTA Staff. It was determined that is was not a violation of Title VI of the Civil Rights Act of 1964 as it did not exclude the passenger(s) from participation in, or denied benefits of, transit services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964. Further telephone interview with the claimant was conducted. The claimant admitted he wasn't sure what to log the complaint as, so he chose Title VI even though he knew it wasn't a Title VI complaint. Complaint was denied. as denied.</u></p>



APPENDIX 7

Racial Breakdown of the Membership of Transit-Related Advisory Committees

	Paratransit Coordinating Council (PCC)	Citizens Advisory Committee (CAC)
Approved Membership Positions	9	19
Filled Membership Positions	6	13
Members Completing Survey	3	2
American Indian/Alaskan Native		
Black or African American (Non-Hispanic Origin)		
White or Caucasian	2	2
Hispanic (Mexican, Puerto Rican, Cuban, Central or South African or other Spanish Origin)	1	
Asian/Pacific Islander		

Outreach Efforts to Encourage Participation

NVTA values the ethnic and cultural diversity of the public it serves in Napa County. Accordingly, when committee vacancies occur, NVTA will ensure that effective efforts are made to encourage the participation of minorities on such committees.

NVTA will utilize a number of strategies to promote meaningful participation by underrepresented groups, including targeted outreach. Methods may include, but are not limited to, one or more of the following:

- Paid and free notices in the local media, especially those ethnically, culturally-based for the targeted group NVTA is trying to reach. This effort includes print, electronic and social media.
- Translating notices into the native language of the targeted group.
- Posting the vacancy on NVTA’s website.
- Outreach to civic, cultural or human services organizations known to serve the targeted group informing them of the opportunity and need and enlisting their help.
- Notifying the municipalities within the county of the vacancy and underrepresentation.
- Placing informational signs on the Vine buses, bus stops/shelters, Customer service, NVTA office, and other facilities.



APPENDIX 8

RESOLUTION No. 19-XX

**A RESOLUTION OF THE
NAPA VALLEY TRANSPORTATION AUTHORITY (NVTA)
ADOPTING THE NVTA TITLE VI PROGRAM POLICY**

WHEREAS, the Napa Valley Transportation Authority (NVTA) is designated the countywide transportation planning agency responsible for Highway, Street and Road, transit, bicycle, and pedestrian planning and programming within Napa County; and

WHEREAS, Title VI of the Civil Rights Act of 1964 requires recipients of federal grants and other assistance to operate their programs and services without regard to, or discrimination based on, race, color or national origin; and

WHEREAS, the Federal Transit Administration (FTA) issued Circular FTA C 4702.1B, effective October 1, 2012, setting forth requirements and guidelines for Title VI compliance; and

WHEREAS, the above-referenced Circular details required elements of a Title VI Program Report, which each recipient of FTA grants and assistance must submit to the FTA every three (3) years to evidence compliance with Title VI;

WHEREAS, NVTA's current Title VI Program expires on January 31, 2020, therefore necessitating submittal of an updated program report to the FTA by December 1, 2019; and

WHEREAS, NVTA's Title VI Program Report must include numerous elements, including but not limited to:

1. Information on numerous agency policies, procedures and activities undertaken over the last three years;
2. A public participation plan (PPP);
3. Information on public outreach undertaken over the past three (3) years, including development and approval of the Vine Transit Title VI Service Equity Analysis Route 25 Napa-Sonoma Express accepted by this Board on September 20, 2017;
4. A plan for engaging persons with limited English proficiency (LEP);
5. System-wide service standards and policies; and

WHEREAS, Staff has developed a proposed Title VI Program Plan, including the above-referenced items and evidencing NVTA's compliance with Title VI, for Board consideration and approval.

NOW, THEREFORE, BE IT RESOLVED, that the Board of Directors hereby adopts the NVTA Title VI Program as set forth in the Title VI Program; and

BE IT FURTHER RESOLVED that the Board of Directors authorizes the Executive Director, or designee, to:

1. Include evidence of the Board's consideration and approval of the Title VI Program;
2. Submit the final Title VI Program to the FTA; and
3. Take any other steps necessary to give effect to this Resolution, including responding to any follow-up inquiries from the FTA.

THE FOREGOING RESOLUTION WAS DULY AND REGULARLY ADOPTED by the Board of Directors of the Napa Valley Transportation Authority, at a regular meeting held on November 20, 2019, by the following vote:

Chris Canning, NVTA Chair

Ayes:

Nays:

Absent:

ATTEST:

Karalyn E. Sanderlin, NVTA Board Secretary

APPROVED:

DeeAnne Gillick, NVTA Legal Counsel

Date: November 20, 2019



Measure T



Projects



Getting Around



Work With NVTA

Contact NVTA



About NVTA

Title VI Notice to Public

TITULO VI Form Para sa Reklamo | TITLE VI Formulario De Queja

The Napa Valley Transportation Authority (NVTA) is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. It's objective to:

- Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin;
- Promote the full and fair participation of all affected populations in transportation decision making;
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;
- Ensure meaningful access to programs and activities by persons with limited English proficiency.

NVTA is committed to a policy of non-discrimination in the conduct of its business, including its Title VI responsibilities and to the delivery of equitable and accessible transportation services. Any person who believes that he or she has been subjected to discrimination under Title VI on the basis of race, color or national origin may file a Title VI complaint with NVTA. Any such complaint must be in writing and submitted to NVTA within one hundred eighty (180) days following the date of the alleged discrimination.

There are several ways to file a complaint. You can download a complaint form on this page. Complaints may be filed in writing and mailed to Civil Rights Officer, NVTA, 625 Burnell St., Napa, CA 94559-3420. A copy of the Title VI Complaint Form is available by calling (707) 259-8631. You may also fill-out an [online](#) complaint form. We encourage use of the Title VI Complaint Form.

You may download a Title VI Complaint form or fill-out an online form. For an online Title VI Complaint form, [CLIC K HERE](#).

LIMITED ENGLISH PROFICIENCY POLICY STATEMENT AND AVAILABLE RESOURCES

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., provides that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives Federal financial assistance. Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP).

To that end, NVTA provides translation and interpretation services free of charge upon request by calling (707) 259-8631.

TITLE VI COMPLAINT PROCEDURE

This section outlines the Title VI complaint procedures related to providing programs, services, and benefits. However, it does not deny the complainant the right to file a formal complaint(s) with any other federal, state, or local agencies or seek private counsel for complaints alleging discrimination, intimidation, or retaliation of any kind that is prohibited by law. Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance.

Contact NVTA

GENERAL

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin as noted below may file a written complaint with the Napa Valley Transportation Authority, Civil Rights Officer, 625 Burnell St., Napa, CA 94559-3420. Complainants have the right to complain directly to the appropriate federal agency. Every effort will be made to obtain a timely resolution of complaints. The option of informal meeting(s) between the affected parties and the Civil Rights Office may be utilized for resolutions.

You may download a Title VI Complaint form or fill-out an online form. For an online Title VI Complaint form, [CLICK HERE](#).

PROCEDURE

NVTA has in place a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in the Federal Transit Administration Circular 4702.1A, dated May 13, 2007.

The complaint procedure must meet the following requirements outlined below:

1. **Submission of Complaint:** Any person who feels that he or she, individually, or as a member of any class of persons, on the basis of race, color, national origin, age, sex, disability, religion, or low-income status has been excluded from or denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance through NVTA may file a written complaint with the Director of Civil Rights. Such complaint must be in writing and signed by complainant(s).
 - a. In cases where Complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The Director of Civil Rights will interview the Complainant and assist the person in converting verbal complaints to writing. All complaints must, however, be signed by the Complainant or his/her representative.
 - b. Include the date of the alleged act of discrimination date when the Complainants became aware of the alleged act of discrimination; or the date on which that conduct was discontinued or the latest instance of conduct.
 - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.

- d. Federal and state law requires complaints be filed within 180 calendar days of the alleged incident.
2. **Referral to Review:** Upon receipt of the Complaint, the Director of Civil Rights in consultation with NVTA's Legal Counsel will determine its jurisdiction, acceptability, need for additional information, as well as assign the complaint to a Specialist to evaluate and investigate the merit of the complaint. The Specialist shall complete their review no later than 45 calendar days after the date NVTA received the Complaint. If more time is required, the Deputy Executive Director shall notify the Complainant of the estimated time-frame for completing the review.
3. **Upon completion of the review:** The Specialist shall make a recommendation regarding the merit of the Complaint and whether remedial actions are available to provide redress. Additionally, the staff may recommend improvements to NVTA's processes relative to Title VI and environmental justice, as appropriate. The Specialist shall forward their recommendation to the Civil Rights Officer for their concurrence. If the Civil Rights Officer concurs, he shall issue NVTA's written response to the Complainant.

A complaint must meet the following criteria for acceptance:

- a. The Complaint must be filled within 180 days of alleged occurrence;
- b. The allegation must involve a covered basis such as race, color or national origin.
- c. The allegation must involve a NVTA service of a Federal-aid recipient, sub-recipient or contractor.

complaint may be dismissed for the following reasons:

- a. The Complainant requests the withdrawal of the complaint.
- b. The Complainant fails to respond to repeated requests for additional information needed to process the complaint.
- c. The Complainant cannot be located after reasonable attempts.

4. **Documentation:** The investigative report and its findings will be reviewed by the Executive Director and in some cases the investigative report and findings will be reviewed by NVTA's Legal Counsel. The report will be modified as needed. The Executive Director and Legal Counsel will make a determination on the disposition of the complaint. Dispositions will be as follows:

In the event NVTA is in noncompliance with Title VI regulations remedial actions will be listed.

5. **Notice of determination:** A Notice of Determination will be mailed to the Complainant. Notice shall include information regarding appeal rights of Complainant and instructions for initiating such an appeal. Notice of Appeals are as follows:
 - a. NVTA will reconsider this determination, if new facts, come to light.
 - b. If Complainant is dissatisfied with the determination and/or resolution set forth by NVTA, the same complainant may be submitted to FTA for investigation. Complainant shall be advised to contact the Federal Transit Administration.
6. **Request for Reconsideration:** If the Complainant disagrees with the Executive Director's response, he or she may request reconsideration by submitting the request, in writing, to the Executive Director within 10 calendar days after receipt of the Executive Director's response. The request for reconsideration shall be sufficiently detailed to contain any items the Complainant feels were not fully understood by the Executive Director. The Executive Director will notify the Complainant of his/her decision either to accept or reject the request for reconsideration within 10 calendar days. In cases where the Executive Director agrees to reconsider, the matter shall be returned to the Director of Civil Rights to reevaluate in accordance with Paragraph 2, above.
7. **Appeal:** If the request for reconsideration is denied, the Complainant may appeal the Executive Director's response to the Complaint by submitting a written appeal to Board of Directors no later than 10 calendar

days after receipt of the Executive Director’s written decision rejecting reconsideration.

- 8. **Submission of Complaint to the Federal Transit Administration:** If the Complainant is dissatisfied with NVTA’s resolution of the Complaint, he or she may also submit a complaint to the Federal Transit Administration for investigation. In accordance with Chapter IX, Complaints, of FTA Circular 4702.1A, such a complaint must be submitted within 180 calendar days after the date of the alleged discrimination. Chapter IX of the FTA Circular 4702.1A, which outlines the complaint process to the Federal Transit Administration, may be obtained by requesting a copy from NVTA at (707) 259-8631.

You may also download a complaint form from FTA's website. Go to www.fta.dot.gov/civilrights for more information.

For more information regarding Title VI or need further language assistance, please contact NVTA by E-mail at Contact Us or call (707) 259-8631.

You may download a Title VI Complaint form or fill-out an online form. For an online Title VI Complaint form, [CLICK HERE](#).

Contact NVTA

 PRINT

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Contact NVTA

Contact

625 Burnell Street

Napa, CA 94559-3420

[Click here for Driving Direction](#)

Front Desk: (707) 259-8631

Email: info@nvta.ca.gov

*If you would like to submit a complaint or comment by email please use the orange "Contact Us" tab on the lefthand side of the page.

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TITLE VI SERVICE EQUITY ANALYSIS LOCAL VINE 2020 SERVICE REVISION

Table of Contents

INTRODUCTION..... 2
BACKGROUND 2
TITLE VI POLICY..... 2
METHODOLOGY..... 2
EFFECTS OF PROPOSED SERVICE CHANGES ON MINORITY AND LOW INCOME POPULATIONS..... 3
 System Wide Effects..... 3
 Disparate Impact Analysis 5
 Disproportionate Burden Analysis..... 6
CONCLUSION 6

INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in programs and activities receiving Federal financial assistance. Federal Transportation Administration (FTA) Circular 4702.1B requires FTA recipients serving populations of 200,000 or greater to evaluate any fare change and any major service change at the planning and programming stages to determine whether those changes have a discriminatory impact. FTA Circular 4702.1B does not require NVTA to perform an equity analysis, as a matter of policy Vine Transit performs equity analyses as guided by FTA Circular 4702.1B. The following analysis will compare service before and after the changes that will occur in January 2020.

BACKGROUND

Beginning in 2016 NVTA staff embarked on a multiphase planning process to enhance the Vine. The results indicated the need for the elimination of one-way loop service. NVTA staff kept much of the existing service area, but did eliminate two non-performing sections. The new routes are predominantly bidirectional and linear doing away with the loops seen on the old system.

TITLE VI POLICY

NVTA will ensure that its programs, policies, and activities all comply with the Department of Transportation's (DOT) Title VI regulations. The Authority is committed to creating and maintaining public transit service that is free of all forms of discrimination. NVTA will take whatever preventive, corrective, and disciplinary action necessary to address behavior that violates this policy or the rights and privileges it is designed to protect.

METHODOLOGY

Using the City of Napa as the service area, the analysis uses the existing population of the service area and compares it to the population located within ¼-mile radius of the stops served by the Vine. For the purposes of this Title VI analysis, NVTA utilized a transit planning software called Remix. Remix uses the following steps to perform a Title VI analysis:

1. Gathers the population 2013-2017 ACS Census data at the block group level within ¼ mile around the stops of the local routes including its low income and minority percentage.
2. Compares the number of people-trips, before and after the proposed changes.
 - a. People trips are determined by multiplying the population near a route by the number of trips it makes per year.

3. Calculates the total difference in people-trips across the NVRTA fixed-route transit system
4. Calculates the change borne by the low-income and minority populations.
5. Compares the percentage change to the average in the City of Napa.

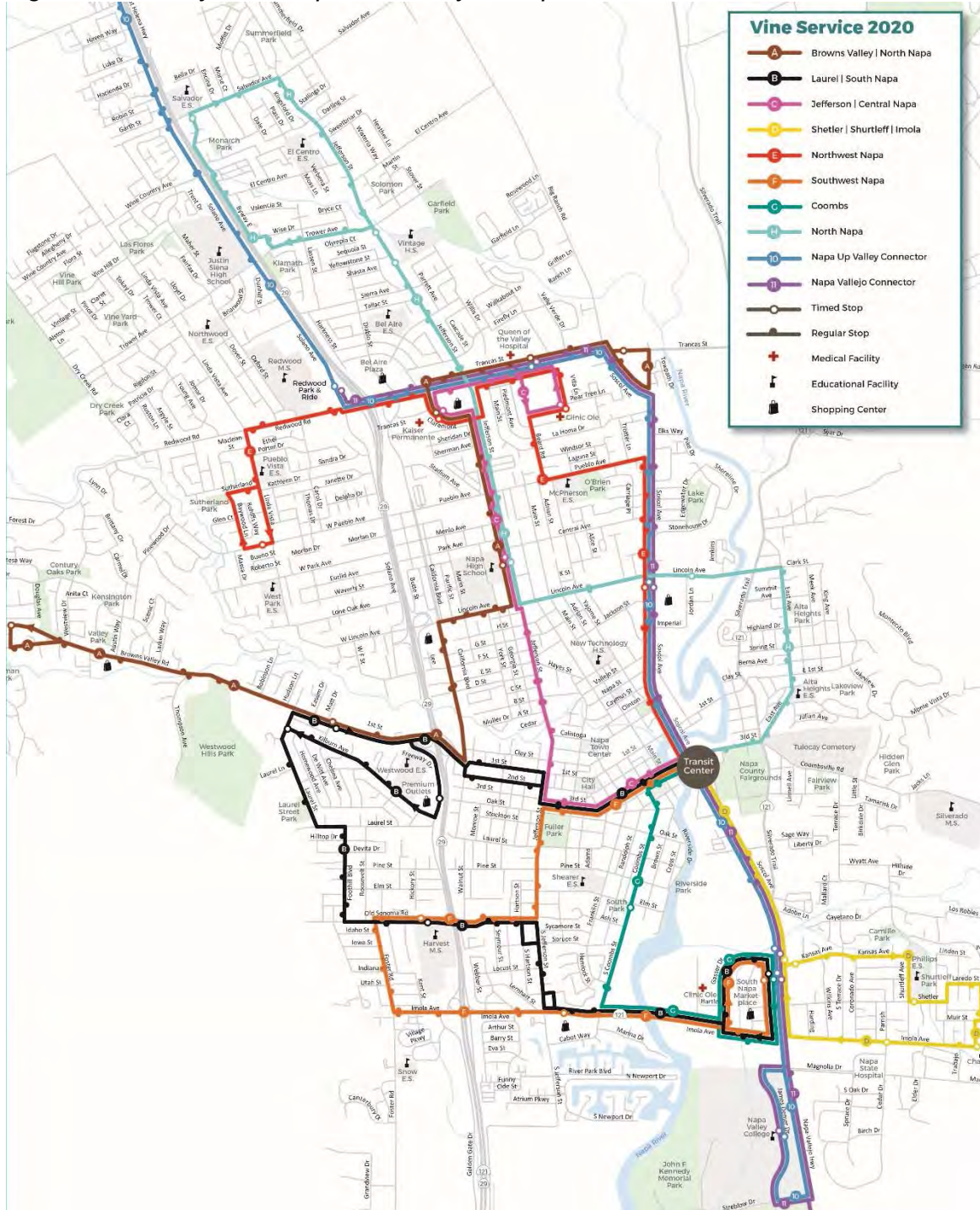
This methodology allowed NVRTA staff to predict how the proposed changes to the Vine system would affect low-income (under 200% of the federal poverty line) and minority populations. This 200% standard is used in the Bay Area to determine Communities of Concern.

EFFECTS OF PROPOSED SERVICE CHANGES ON MINORITY AND LOW INCOME POPULATIONS

System Wide Effects

The effects of the change are truly systemwide, as all routes serving the City of Napa will change in some way. As noted above, the form of the routes will change but much of the current service area will remain the same. Notable exceptions are areas northwest of Redwood Road and a part of the City east of Silverado Trail. Figure 1 shows the routes as of the writing of this report. Figure 2 shows the routes, as they will become January 6, 2020.

Figure 2: New System Map for the City of Napa



Disparate Impact Analysis

The disparate impact analysis compares the minority population in the NVTAs service area (City of Napa) to the minority population effected by the service change.

The minority population in the City of Napa is 46.3% of the City's total population compared to 47.3% for the area within ¼ mile of the stops serving the Vine in the City of

Napa. Therefore, the impact is 1.0% more of the minority population within the effected jurisdiction than the general minority population in the City of Napa. Although the minority population impacted is greater than the general population, the analysis indicates that it is not high enough to constitute a disparate impact.

Disproportionate Burden Analysis

The disproportionate impact analysis compares the low-income population in the NVTAs service area (City of Napa) to the low-income population effected by the service change. The percentage of households with annual income under 200% of the federal poverty level represents 26.3% of the City of Napa's population. The low-income population for the area within ¼ mile of the stops in the City of Napa is slightly higher at 31.2%. The delta between the two low-income populations is 5.0%. Once again, the analysis indicates that there is not a disproportionate impact.

CONCLUSION

While there are a slightly higher percentage of minority and low income households than in the general City of Napa population affected by the service changes in the City of Napa, the difference does not constitute a disparate or a disproportionate impact. NVTAs plans to redistribute service levels where they are needed most, which may push these small impacts even closer to zero.

