



Title VI Plan

January 2020 – December 2023

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Valley Transit Title VI Policy Statement and Mission

Valley Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or be subject to discrimination in receipt of its services or programs on the basis of race, color, national origin, or any other characteristic protected by law, including Title VI of the Civil Rights Act of 1964, as amended. Further, under the Americans with Disabilities Act (ADA) of 1990, no entity shall discriminate against an individual with a physical or mental disability in connection with the provision of transportation services.

Valley Transit's primary goal is to ensure all management, staff, contractors, local agencies, and service beneficiaries are aware of the provisions of, and responsibilities derived from Title VI of the Civil Rights Act of 1964 and the Federal Transit Administration (FTA) Circular 4702.1B of 2012.

Valley Transit's Title VI policy is responsible for providing leadership, direction, and policy to ensure compliance with Title VI, Environmental Justice, and Limited English Proficiency principles. This policy also ensures that social impacts to communities and people are recognized and considered throughout the transportation planning, and decision-making process.

To obtain more information on Valley Transit's nondiscrimination obligations or to file a Title VI complaint, contact Valley Transit's Title VI Coordinator at:

Title VI Coordinator
1401 West Rose Street
Walla Walla, WA 99362

Email address: info@valleytransit.com
By phone: 509-525-9140
By Fax: 509-525-9142

You may file a written complaint no later than 180 days after the date of the alleged discrimination.

Information on non-English alternative formats may be obtained from the Administrative Department at 509-525-9140.

La información sobre formatos alternativos que no están en inglés se puede obtener del Departamento Administrativo al 509-525-9140



Angelic Peters
General Manager

Angelic Peters, General Manager
Phone: 509-525-9140 – Fax: 509-525-9142
1401 West Rose Street
Walla Walla, WA 99362
www.valleytransit.com

What is Title VI?

Title VI of the Civil Rights Act of 1964 is the main legal authority for the Office of Equal Opportunity, External Civil Rights nondiscrimination programs. Title VI prohibits discrimination on the basis of race, color, or national origin in programs or activities receiving federal financial assistance. Once an agency accepts federal funds, all of its programs and activities are covered, regardless of their funding source. Related statutes and Presidential Executive Orders under the umbrella of Title VI address Environmental Justice (EJ) in minority and low-income populations, and services to those individuals with Limited English Proficiency (LEP), women and those with disabilities.

What does that mean to passengers?

Valley Transit cannot, on the basis of race, color, national origin or sex, either directly or through contractual means:

- Deny program services, aids or benefits;
- Provide a different service, aid or benefit, or provide them in a manner different than what is provided to others;
- Segregate or separately treat individuals in any matter related to the receipt of any service, aid, or benefit.

This plan documents Valley Transit's efforts to comply with these requirements.

Notification of Beneficiaries of Title VI Rights

1. Valley Transit hereby gives public notices that it is the Organization's policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities. Title VI requires that no person shall, on the grounds of race, color, sex, or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any Federal Aid Highway program or other activity for which Valley transit received Federal financial assistance.
Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with Valley Transit. Any such complaint must be in writing and filed with the Valley Transit Title VI Coordinator within on hundred, eighty (180) days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained from the Valley Transit office (at no cost to the complainant), on the website at www.valleytransit.com, by calling 509-525-9140 or by faxing 509-525-9142.
2. Valley Transit's website includes the Title VI policy and complaint form. These can also be found at our Main Office (located at 1401 West Rose Street, Walla Walla, WA) as well as the Market Station Transfer Center (located at 109 West Main Street, Walla Walla, WA). Individuals who believe they have been discriminated against may request a complaint form from the Customer Service representatives at the Main Office or print them from the website.
3. If information is needed in another language, please contact the Title VI Coordinator at 509-525-9140

Title VI Complaint Procedure

Any person who believes they have been discriminated against on the basis of race, color, or national origin by Valley Transit may file a Title VI complaint by completing and submitting a *signed* Title VI Complaint Form which can be accessed at www.valleytransit.com or by requesting a copy from Valley Transit staff at 1401 West Rose Street, Walla Walla, WA 99362 or calling 509-525-9140. The complaint should include the following information:

- Your name, mailing address, and how to contact you (i.e. telephone number, email address, etc.)
- How, when, where, and why you believe you were discriminated against. Including the location, names of and contact information for any witnesses.
- Other information that you feel is significant.

The complaint may be filed in writing at the following address:

Valley Transit

Title VI Coordinator

1401 West Rose Street

Walla Walla, WA 99362

By Phone: (509) 525-9140

By Fax: (509) 525-9142 (*an original, signed copy must be mailed to the Title VI coordinator as soon as possible, but no later than 180 days from the alleged date of discrimination if you submit through this format*)

Note: Valley Transit encourages all complainants to certify all mail that is sent through the U.S. Postal Service, and/or ensure that all written correspondence can be easily tracked.

Valley Transit's process for addressing a Civil Rights Complaint is as follows:

- Once the complaint is received Valley Transit staff will review it to determine the jurisdiction of the complaint. The complaint will be logged and the complainant will receive an acknowledgment letter, email, or fax (in a fashion appropriate to the manner in which the complaint was received) within 14 days informing them whether the complaint will be investigated by our office.
 - In instances where additional information is needed for investigation of the complaint, Valley Transit will contact the complainant in writing. Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.
- Any complaint that deals with Federal Civil Rights Issues will be reviewed by the Title VI Coordinator and forwarded to the General Manager.
- Once the complaint has been logged, Valley Transit has 60 days to resolve the issue, not including the appeals process
 - Once sufficient information for investigating the complaint is received by Valley Transit, a written response will be drafted, subject to review by the transit's attorney. If appropriate, Valley Transit's attorney may administratively close the complaint. In this case, Valley Transit will notify the complainant of the action as soon as possible.
- It is *anticipated* that *most* Title VI Complaint Investigations will follow this timeline:

- Within 7 calendar days from the log date, Valley Transit will investigate the full complaint, including but not limited to: clarifying questions with the complainant, interviewing staff alleged to be involved, inquiring with witnesses to alleged event(s), consulting with local and state civil rights experts, and following up with the complainant.
- Within 10 calendar days from the log date the Title VI Coordinator will provide the respondent(s) and General Manager with a written account of the investigation(s) and finding(s). The respondent(s) will have 10 calendar days from the date of notification to accept the account of events or furnish their written response to the allegation(s).
- Within 30 days from the log date, Valley Transit will take corrective action(s) deemed to be necessary and appropriate.
- Within 60 days from the log date, Valley Transit's final investigative report and a copy of the complaint will be forwarded to the complainant(s), respondent(s), WSDOT Public Transit Division, and the Federal Transit Administration's Office of Civil Rights.

The final notification to the complainant will include their right to 1) appeal to Valley Transit's General Manager within 7 calendar days of the receipt of the final written decision, and/or 2) file a complaint externally with the Federal Transit Administration.

Federal Transit Administration
Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC, 20590

Record of Title VI or other Civil Rights Investigations, Complaints, or Lawsuits

Valley Transit maintains an active log for all Civil Rights Complaints with internal software, and a copy of the current log is available upon request by submitting a public records request via letter or email to the Public Records Officer. To date, there have been no Title VI complaints, investigations, or lawsuits at Valley Transit.

Public Participation Plan and Summary of Efforts

Purpose

The purpose of this Public Participation Plan (PPP) is to establish procedures that encourage the full participation of all citizens in the Valley Transit service area, including but not limited to, low-income and minority individuals, and those with limited English proficiency. While traditional means of soliciting public involvement may not reach such individuals, or might not allow for meaningful avenues of input, the intent of this effort is to take reasonable actions throughout the planning process to provide opportunities for historically under-served populations to participate. Additionally, as members of the Walla Walla Valley Metropolitan Planning Organization (WVVMPO), Valley Transit closely partners with them on their established Transportation Improvement Plan (TIP), and Public Participation Plan (PPP) which satisfies our requirements as part of serving the same community.

This document will lay out procedures to provide opportunities for all area citizens to participate in the development of short and long term plans for Valley Transit. Where appropriate, Valley Transit will make improvements to its public participation system.

A notice will be posted in English and Spanish local newspapers and on the Valley Transit website noting the existence of this PPP and a copy will be sent, at a minimum, to stakeholders identified in this document.

Goals and Objectives

The goal of the PPP is to offer opportunities for the engagement of all citizens of Valley Transit’s Service Area to participate in the development of short and long term plans.

In support of this goal, our objectives are:

- To determine what non-English languages, and other cultural barriers exist to public participation within Valley Transit’s Service Area;
- To provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to all populations in the area;
- To hold meetings in locations which are accessible and reasonably welcoming to all area residents, including, but not limited to, low-income and minority members of the public;
- To provide avenues for a two-way flow of information and input from populations that are not likely to attend meetings;
- To provide a framework of actions to encourage public participation in the development of various types of plans and programs, as well as amendments or alterations to any such plan or program;
- And to use various illustrative, visualization techniques to convey the information including, but not limited to, charts, graphs, photos, maps, and the internet.

Identification of Stakeholders

Valley Transit stakeholders are those who are either directly or indirectly affected by a plan, or the recommendations of that plan. Those who may be adversely affected, or who may be denied the benefits of a plan’s recommendation(s) are of particular interest in the identification of specific stakeholders. Stakeholders are broken down into several groups: general citizens, minority and low-income persons, public agencies, and private organizations and businesses.

Valley Transit Service Area

| Category | Number | Population Percentage |
|---------------------------|--------|-----------------------|
| Total | 42,344 | 100% |
| White | 36,069 | 85.2% |
| Hispanic | 9,725 | 23% |
| Black | 801 | 1.9% |
| American Indian/Alaskan | 495 | 1.2% |
| Asian | 796 | 1.9% |
| Hawaiian/Pacific Islander | 52 | 0.12% |
| Two or More | 2,128 | 5% |

General Citizens

According to the 2018 Census Bureau data, there are 42,344 citizens in the Valley Transit Public Transportation Benefit Area. 2018 Census Bureau data indicates that of persons over the age of 5, 18.75% of the population speaks a language other than English at home. According to ALPACA data, the majority of that LEP demographic speak Spanish with an average of 4.5%. Most other languages account for 1% or less of the remainder. While the most current data indicates that the entire Service Area averages to lower than the Title VI threshold, there are 10 census tracts over the threshold, with some having as much as 25% of their population speaking Spanish as their first language. Because of this, Valley Transit maintains that providing materials in Spanish will remain a priority.

Some of the techniques that can be used to engage the general population are public notices of meetings in the local newspaper, via social media channels, and on the radio. These meetings can be held as open house format public information meetings in locations such as the public library or even at Valley Transit's Administrative Building. Staff will also continue to utilize on-board surveys, focus groups, and use of local media and the internet to encourage participation from the public.

Minorities

Minority populations make up 33.12% (the total percentage does not equal 100% due to some white respondents also identifying as having Hispanic or Latino Heritage) of the population in Valley Transit's Service Area. Hispanics make up the largest minority, with an average of 23% of the population. Black and Asian populations make up 1.9% each. American Indians account for 1.2% of the population, and Pacific Islanders represent less than 1%.

Engaging minority and low-English proficiency populations can be a challenge. Language and cultural differences may not be compatible with the more traditional means of engaging the public in the planning process. Valley Transit has made reasonable efforts to engage minority populations using non-English mediums such as Spanish language radio and newspapers. Participation in the regional Metropolitan Planning Organization, the Human Services Transportation Plan Oversight Committee, and meetings with representative from local human services organizations allows us to garner input from specific segments of the population. Valley Transit provides in-house translation services, utilizes the services of a telephone language line, and offers Travel Training services with Spanish speaking employees. Valley Transit offers assistance in the event an individual would need alternative language interpretation, including Sign Language.

Low-Income

The 2018 Census Bureau data listed the per capita income for Walla Walla County as \$24,129. The median household income was \$48,102. The percentage of persons living at or below the Federal Poverty Level was 16.4%

While low-income individuals may have access to all of the traditional means of public involvement discussed earlier in the section of "general citizens," they may be less likely to become involved or offer input. Some methods of gathering input either directly or indirectly from this population includes on-board surveys and the involvement of agencies such as the local employment offices, housing groups, and public assistance providers that work with low-income individuals and families.

Public Agencies

Public agencies can provide valuable input in the planning process. Pertinent public agencies include those that have clients who fall into under-represented populations, including but not limited to minorities, low-income, and limited English proficiency households. All of these agencies have insight into the transportation needs of their clients, and are useful partners in overcoming barriers that may not be understood by professionals dealing more directly with the provision of services.

Private Organizations and Businesses

Private organizations and businesses offer a number of perspectives that are valuable to our planning processes. Valley Transit has extensive contact with service providers who work closely with the developmentally disabled and elderly populations who often cross over into the low-income, minority, and limited English proficiency demographic(s).

Outreach Efforts

Valley Transit has board approved public participation/public notification policies (see Appendix B). In addition to the processes set out in this policy, staff may use the following techniques during its planning studies as deemed appropriate by staff:

- Presentations to professional, citizen, and other organizations
- Articles in community newspapers
- Interviews with local radio stations (both English and Spanish Speaking)
- Press releases and meetings with local media representatives
- Informational conversations with individuals and small groups
- Interviews with individuals who are or may be affected by proposed plans
- User and non-user surveys
- Use of illustrative visualization techniques to convey the information including, but not limited to, charts, graphs, photos, maps, and the internet

During any planning process the public is invited to contact Valley Transit with comments and/or to request additional information. Requests can be made via telephone by contacting Valley Transit Customer Service at 509-525-9140, through the contact form at www.valleytransit.com, or through email to info@valleytransit.com. Comments will be collected, documented, and presented to the Valley Transit Board of Directors. Valley Transit does not record social media interactions as part of the formal public comment process, but does maintain an archive of all interactions on their social media channels.

Summary of Public Participation Efforts

Service recipients have wide latitude to determine what specific measures are most appropriate and should make this determination based on the composition of the affected population, the public involvement process, and the resources of Valley Transit. Valley Transit has engaged the public in its planning and decision-making processes, and the public was invited to participate through marketing and outreach activities as well.

Transit Development Plan (TDP)

The Transit Development Plan is a requirement of the Washington State Legislature (RCW 35.58.2795). The TDP is prepared by the independent transit properties and submitted to WSDOT. A summary document is prepared that shows the size of the fleet, revenue, service revenue hours, revenue miles, operating expenses, and capital expenditures. The document projects future service levels and capital improvements. Public hearings are held at Valley Transit to obtain comments from the public on the TDP.

Transportation Improvement Plan (TIP)

The Transportation Improvement Program is prepared and used as a planning document to identify agency requirements for capital replacement and improvement projects. Public hearings are held by the WWVMPO to obtain comments from the public on Valley Transit's TIP. All TIPs from local jurisdictions (counties and cities) as well as all transit TIPs are merged to create the Statewide Transportation Improvement Program (STIP) which is required by the federal government. If an item Valley Transit wishes to purchase is not in the STIP, it cannot be funded with federal funds. Although the STIP is a federal requirement, it goes through a Regional and Statewide planning process.

Board Meetings

The Valley Transit Board of Directors holds monthly meetings and the public is invited to attend, with a standing agenda item inviting public comment. The agenda for each meeting is sent each month to La Voz, the local Spanish newspaper, to ensure meeting information is available in a non-English format.

Public Meetings

When new service is proposed, significant route changes are made, or plans other than the TDP or TIP are updated information is disseminated to the neighborhoods affected and public meetings are scheduled. Rider alerts are placed on buses, shelters, and route signs to advertise for public meetings with impacted populations.

Major Service Changes

When potential service changes are considered, Valley Transit engages the public, through meetings, to invite comment and questions. A notice is posted requesting that attendees in need of language assistance call the main office to make the request. Rider alerts are placed on buses, shelters, and route signs to advertise for these meetings with impacted populations.

Fare Increases

If Valley Transit must consider a fare increase, the public is invited to participate and comment on any potential change to the fare at public meetings that are scheduled to solicit their input. Rider alerts are placed on buses, shelters, and route signs to advertise for these meetings with impacted populations.

Travel Training Classes

Valley Transit has developed a travel training program to reach out to community groups (i.e. senior centers, senior facilities, and those people who have disabilities, etc.) to conduct travel training classes.

Travel training classes are ongoing as well as outreach to these populations, and any others that are identified as having a need.

Customer Comment Process

Those residing in the Valley Transit PTBA may call our Main Office at 509-525-9140 to lodge a complaint, compliment, or comment. All complaints, compliments, and comments are entered into a database and distributed to the relevant department manager. The manager researches the complaint and if appropriate responds back to the citizen (if valid contact information is given). This database allows complaints to be sorted by type, and maintains a separate log for Title VI and ADA complaints.

Valley Transit tracks complaint type, the date of the complaint, the investigation, any legal action taken, a summary of the allegation(s), the status of the complaint, and a summary of any actions taken in response to the complaint.

All information is tracked until the complaint, investigation, and/or legal action has been closed. The records are then stored according to state and federal records retention requirements. Tracked information (such as Title VI or ADA) will be reported to the FTA and/or WSDOT as the grantors of public funds.

General Awareness and Phone Survey

Valley Transit periodically conducts onboard rider and general awareness surveys. Origin/Destination surveys and other public surveys are developed to assist Valley Transit in gathering information about service alternatives and possible route changes. Valley Transit is in the process of conducting a comprehensive system analysis, expected to take place in 2020, to evaluate the need for service changes based on the significant community growth and change in landscape over the last decade.

Bilingual Outreach

Valley Transit's Customer Service representatives provide Spanish-speaking guests with information on public transit services in Spanish. Valley Transit offers Spanish training to all staff to facilitate the ability to deliver this service. Interpreter services are utilized in outreach programs and offered for programs and public meetings. Valley Transit refers to phone language services in the event that a guest is in need of interpretation for a language not spoken by staff.

Limited English Proficiency Outreach Plan

Valley Transit is committed to breaking down language barriers by implementing consistent standards of language assistance across its service area.

Census

The United States is home to millions of national origin minority individuals who are limited English proficient (LEP). That is, their primary language is not English and they cannot speak, read, write, or understand the English language at a level that permits them to interact effectively with recipients of Federal financial assistance. Because of language differences and the inability to effectively speak or understand English, persons with LEP may be subject to exclusion from programs or activities, or experience delays or denials of services. These Individuals may be entitled to language assistance with

respect to a particular type of service. The Federal Government and those receiving assistance from the Federal Government must take reasonable steps to ensure that LEP persons have meaningful access to the programs, services, and information those entities provide. This will require agencies to establish creative solutions to address the needs of this ever-growing population of individuals for whom English is not their primary language. To determine the need to provide language assistance for non-English speaking individuals, information was gathered from ridership surveys, social service agencies, and local school districts.

Analysis of Factors

Factor #1: The number or proportion of LEP persons in the Service Area.

Valley Transit's jurisdiction (or PTBA) covers the cities of Walla Walla and College Place and parts of Walla Walla County. Valley Transit has an established practice of extending Dial-a-Ride services into new areas annexed by either city, and evaluating the efficacy of expanding Fixed Route service on regularly schedule service audits. The vast majority of the population with which Valley Transit does business (individuals wishing to ride transit) is proficient in English, so intensive LEP services are not required on a regular basis. According to the 2018 Census Bureau data, English is spoken by 81.25% of the residents in the transit service area. Overwhelmingly, Spanish speak in the household represents 4.5% of the non-English speaking population within the Valley Transit Service Area. This 4.5% is the average over all Census tracts, but some Census tracts have as much as 25% of the population speaking Spanish as the primary language in the household.

Factor #2: The frequency with which LEP individuals come into contact with the service.

Valley Transit serves LEP persons daily via our buses, Paratransit, Demand Response services, and Vanpool program. Customer Service representatives have received Spanish language training, and many of the operators have been certified as proficient in conversational Spanish. Valley Transit also provides "Language Line" services and uses Google Translate to communicate as needed. Language assistances and document translation services are also available upon request.

Factor #3: The nature and importance of services provided by Valley Transit

Valley Transit provides important public transportation services to the residents of the PTBA through its Fixed Route, Paratransit, Demand Response, and Rideshare programs.

Factor #4: The resources available to the recipient of federal funds to assure meaningful access to the services for LEP persons

Valley Transit's current in-house language capabilities are English and Spanish only. Staff currently has job-related conversational language proficiency certified/re-certified on a bi-annual basis. Staff is incentivized monetarily to receive this training, and upon certification begin delivering service to LEP persons on any occasion they have contact with the transit system.

Additionally, Valley Transit has an outreach program where Spanish-speaking passengers are taught how to ride the bus through training and one-on-one assistance with a staff person who can speak their language. Finally, Valley Transit has publications in both English and Spanish, with the route guide displaying information in both languages on the same document. Special notices of public meetings

and accommodations are always made available in Spanish. Over each biennium Valley Transit invests roughly \$11,200 in providing documents and advertisements in both English and Spanish.

Implementation Plan

Valley Transit has already implemented its plan and will review it on a triennial basis unless a Title VI complaint necessitates reviewing it sooner. Valley Transit will continue to identify LEP persons in the service area by ridership, telephone contact counts, neighborhood demographics, general awareness surveys, and board surveys. Per CFR 21.9(d) Valley Transit maintains postings of statements of rights, and a policy statement, for Title VI beneficiaries. A copy of these can be found in Appendix H.

Disparate Impact and Disproportionate Burden Policy

In the course of performing an analysis of a Major Service Change, Valley Transit must consider how proposed actions will impact minority (as compared to non-minority) populations. In the event that proposed action(s) have a negative impact that affects minorities more than non-minorities with a disparity that exceeds 20% compared to the same impacts borne by non-minority populations. Valley Transit must evaluate whether there is an alternative that may result in a more equitable impact. Otherwise, Valley Transit must take measures to mitigate the impact of the proposed action on the affected minority population and demonstrate that a legitimate business purpose cannot otherwise be accomplished and that the proposed change is the least discriminatory alternative.

This policy also establishes a threshold for determining whether a given action has a disproportionate burden on low-income populations versus non-low-income populations. The Disparate Impact and Disproportionate Burden Policy apply only to low-income populations that are *not also* minority populations. The threshold for Valley Transit to determine Disproportionate Burden impacts of a Major Service Change borne by the low-income population is 20% compared to the same impacts borne by non-low-income populations.

Minority Representation Table

| | Caucasian | Hispanic/Latino | African American | Asian | Native American | Pacific Islander |
|-------------------------|-----------|-----------------|------------------|-------|-----------------|------------------|
| Service Area Population | 85.2% | 23% | 1.9% | 1.9% | 1.2% | 0.12% |
| Board of Directors | 85.7% | 14.3% | 0% | 0% | 0% | 0% |
| Staff | 93% | 7% | 0% | 0% | 0% | 0% |

Construction Project Equity Analysis

Over the last three years Valley Transit has not completed a construction project requiring an environmental assessment (EA) or environmental impact statement (EIS), but is aware of the Title VI requirements to conduct equity analyses for all facility construction projects, **during** the planning state. Valley Transit will follow all requirements under the National Environmental Policy Act and other

overarching planning processes to guide equitable consideration of facility sites and their impacts. A facility that results in Disparate Treatment may have substantial legitimate justification and lack of other alternatives. If so, both must be demonstrated in the planning process.

Fixed Route Service Standards and Policies

Vehicle Load

Valley Transit will design its services to keep the number of passengers on its vehicles at a comfortable level, always within the limits of safety. In peak periods, this means that some passengers may be expected to stand for part of the trip. In off-peak periods, services will be designed to try to provide a seat to all passengers. Consideration is given to matching the capacity of the vehicles to the historic ridership levels on a route to avoid unnecessary increases in service levels. If the standard is consistently exceeded for the average calculation, Valley Transit may consider larger vehicles for the route(s) in question, or more frequent service to improve the riding experience for all passengers. All vehicles are wheelchair lift or ramp equipped.

Where services operate on a highway, services will be planned for all riders to be seated. Route segments that have a significant and measurable history of inappropriate passenger behavior may be limited to seated only capacity so the onboard video security can effectively record passenger activity or conduct. Valley Transit will also plan services to reduce load during peak service windows exceeding 30 minutes. The following are maximum loading standards for Valley Transit based on percentage of seats provided. All vehicles are assigned based on passenger load, route demand, and run cut.

| <u>Operating Period</u> | <u>Load</u> |
|------------------------------|-------------|
| Peak 30 minutes | 125% |
| Peak Hour | 100% |
| Base (non-peak) | No Standees |
| Evening and Saturday Service | No Standees |

Vehicle Headway

During peak periods, the frequency of service is usually determined by the load factor standard established above. However, during non-peak periods, Valley Transit has established headways (times between buses expressed in minutes), to guide the provision of service equitably through the Service Area. Policy headways for regularly schedule service should not exceed 60 minutes. Different routes, service structures, and passenger needs have led to variable headways as listed below

| <u>Service/Route</u> | <u>Headway</u> |
|----------------------------------|----------------|
| Routes 1E, 1W, 2, 3, 4, 5, and 6 | 30 minutes |

(1E & 1W maintain this by running four buses)

Routes 7 and 9

60 minutes

Evening and Saturday Service

45 minutes

Regularly scheduled service does not include morning and afternoon trippers or special purpose service(s) designed to meet individual circumstance (e.g. shift changes, etc.)

On Time Performance

Valley Transit defines On Time as zero minutes early to three minutes late. Under no circumstances should buses run ahead of schedule. Late operation will be defined as any service that arrives in excess of three minutes beyond a scheduled time. Valley Transit has established an On Time performance standard of no less than 90% of all scheduled time points.

Service Availability

Valley Transit operates with the goal of ensuring that 80% or more of Walla Walla and College Place residents live within $\frac{3}{4}$ of a mile of a public transit service line. Transit Access is determined by mapping all active public transit bus service in the county and then calculating the population (based on the most current Census Bureau Data estimates at the time) within $\frac{3}{4}$ of a mile radius of those lines. The information is then compared to the total population in Walla Walla and College Place. Valley Transit's Service Area has a population of 42,344. The Fixed Route services are available to 100% of residents living within the Service Area. Additionally, upon approved application, Paratransit/Dial-a-Ride services are available for 100% of residents meeting eligibility requirements. Valley Transit makes additional service connection to our Service Area through the Market Station Transfer Center with Columbia County Public Transit, Grape Line, Kayak, and Milton Freewater Public Transit.

Vehicle Assignment Policy

As expressed above, vehicles are assigned based on size and modal function. All Valley Transit vehicles are maintained to the FTA's State of Good Repair standard, and have an equivalent level of amenities and ADA accessibility, relative to age and design. When new vehicles are purchased it is Valley Transit's practice to replace like with like, unless a significant improvement in the public transit vehicle market has taken place since the last purchase. Given Valley Transit's maintenance standards, vehicle age does not serve as a proxy for condition for the fleet.

Amenities

Valley Transit maintains a transfer center/service hub at Market Station, located at 108 West Main Street, Walla Walla, WA. This facility has resting areas for passengers as well as staff, public restrooms, a staffed information window, parking spaces nearby, digital real-time route tracking signage, and security staff on-site. There are bus shelters located near this transfer station as well as out on the Fixed Route lines Valley Transit runs.

Valley Transit will plan for bus stops to be placed at most intersections, passenger generators, and transfer points (subject to minimum spacing criteria). The spacing of stops should not normally be less than 700 feet in developed areas (about two blocks) and 1500 feet in underdeveloped areas (specific major trip generators may require variance in stop spacing). Currently, Valley Transit's stop spacing minimum standard is 700 feet in urban areas. Valley Transit continues to provide flag stops, at this

time, where the driver determines it to be safe to board and de-board passengers. This is not allowed in the downtown business district.

Where appropriate in urban areas, Valley Transit provides various amenities such as passenger information kiosks, benches, and litter receptacles. These guidelines are desired levels of service to generate such amenities, but may be modified to reflect the economic viability of the operating budget to enable these expenditures. The criterion for distribution is determined through the following criteria:

- Approval of DEQ Categorical Exclusion process
- Ride demand volume
- Passenger requests
- Staff recommendations
- Public comment process
- Site availability and right of way partnerships
- Budgetary restrictions

For future amenity additions/constructions, placement review will include (without being limited to):

Bus Stop Passenger Shelters

- Establish history of passenger stops generating 6 or more boardings per hour
- Proximity to senior residences and institutional facilities
- Unique exposure to inclement weather
- Terminals and transfer points

Bus Stop Passenger Benches

- Established history of passenger stops generating 4 passenger boardings per hour
- Proximity to senior residences and shopping outlets

Passenger Information Kiosks

- Proximity to a passenger stop with an established history of no less than 7 boardings per hour
- Terminals and transfer points

Litter Receptacles

- To be placed at stops with a shelter, or at waiting areas that historically generate unusually high volumes of litter

Lighting

- Valley Transit will consider the installation of safety lighting at shelters in poorly lit areas, or work with property owners, the city, or the county to provide improved lighting

Valley Transit will endeavor to ensure any development around major stops follows transit supportive design principles – closer to the street, favor pedestrian connections, and customer friendly uses in commercial areas such as coffee shops, or passenger amenities. When placing a bus stop near an intersection it should be located in the safest position, considering traffic and street conditions. Where possible, stops should be located close to signalized intersections. Pull outs should be considered for

stops near major trip generators, transfer points, timing points, or anywhere else a bus is likely to have an extended stop time. Valley Transit works with local jurisdictions to ensure that the area around transit bus stops should be made accessible to people with disabilities, including wheelchairs and other mobility aids. The long-term objective of Valley Transit is to accommodate accessible features at all of its stops.

Valley Transit will place bus terminals and minor turnaround facilities at transit nodes identified as being at the beginning or end of a route and/or the convergence of two or more routes, where local services such as shuttles also connect. Development around the stations and terminals should incorporate into transit-oriented development uses and design principles.

Appendix A: Title VI Complaint Form

VALLEY TRANSIT TITLE VI COMPLAINT FORM

Title VI of the 1964 Civil Rights Act requires that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” If you feel you have been discriminated against in transit services, please provide the following information in order to assist us in processing your complaint and send it to:

Valley Transit
Title VI Coordinator
1401 W. Rose Street
Walla Walla, WA 99362
509-525-9140
509-525-9142 (fax)

PLEASE PRINT CLEARLY:

Name: _____

Address: _____

City, State, Zip Code: _____

Phone Number: _____ Home: _____ Cell: _____

Person discriminated against (*if different*): _____

Address of person discriminated against: _____

City, State, Zip Code: _____

Please indicate below the discrimination you believe occurred (check all that apply):

_____ Race or color

_____ National origin

_____ Income

_____ Other

What was the date (Month, Day, Year) of the alleged discrimination? _____

Where did the alleged discrimination take place? _____

Please describe as clearly as possible the circumstances as you saw it and why you believe you were discriminated against (include all persons involved):

Please list any and all witnesses' names and phone numbers:

| | |
|-------------|----------|
| Name: _____ | #: _____ |
| Name: _____ | #: _____ |
| Name: _____ | #: _____ |
| Name: _____ | #: _____ |
| Name: _____ | #: _____ |

What type of corrective action would you like to see taken?

Please attach any documents you have which support the allegation. Date and sign this form and send it to the Title VI Coordinator at the address listed on page 1 of this document.

Your Signature

Print your name

Date

Appendix B: Public Notification Policy for Fare/Service Changes

Public Statement and Purpose

It is the policy of Valley Transit to maintain an open and participative process and to consider public comment prior to a fare increase, a major service change, short and/or long term planning programs, as well as Valley Transit's Title VI Plan, Disadvantaged Business Enterprise (DBE) Plan, and Americans with Disabilities Act (ADA) Plan. Public input is solicited while proposals are under consideration. The public is notified prior to the implementation of any recommendations.

Changes requiring a public process

Changes includes changes defined in the Valley Transit Title VI policy including but not limited to:

- A Major Service Change is defined as any change in service on any individual route that would add or eliminate more than 20% of the route revenue miles or 20% of the route revenue hours. All Major Service Changes will be subject to an equity analysis which includes an analysis of adverse effects.
- A service change leading to an adverse effect is defined as a significant geographical or time based reduction in service which includes but is not limited to: span of service changes, frequency of changes, route segment elimination, re-routing, or route elimination.
- A disparate or disproportionate change is defined by Valley Transit's Title VI policy as impact 5% of low-income or minority population(s) as compared to the population not meeting that criteria.

Any Fare Increase

Any fare increase will be subject to the following public input and involvement process:

Procedures

In order to ensure the maximum opportunity for public input and involvement in the decision process regarding Major Service Changes and fare increases, Valley Transit adheres to the following procedure:

1. Provide at least a 45-day advance notice of public hearings regarding Major Service Changes, or fare increases in both English and Spanish.
2. Customers, the public, and the community will be informed of the proposed change, comment process, and public hearings by way of newspaper notices/news releases, onboard fliers, postings at Valley Transit buildings, and the Valley Transit website in English and Spanish.
3. Public Hearings held at the Valley Transit Board Room shall commence at times accessible by Valley Transit buses.
4. All input and comments including minutes of public hearings, recommendations of the general public, and Valley Transit staff recommendations shall be provided to the Valley Transit Board of Directors prior to any decision regarding Major Service Changes or fare increases.

Public Comment Procedure

Valley Transit is committed to providing reliable and safe transportation options for the community. Customer service is a primary core value of our organization. The customers of Valley Transit are a

fundamental aspect of the business and as such, their feedback is crucial to the growth and development of the agency.

The Valley Transit Customer Comment Policy has been established to ensure that riders of all modes of the system, including Fixed Route, Paratransit, and Vanpool have an easy and accessible way to provide feedback to the agency. Valley Transit is open to hearing any customer feedback including complaints, comments, suggestions, or concerns.

Customers May Provide Public Comment to Valley Transit in the Following Ways:

1. Customer Comment Cards are available on Valley Transit vehicles and at Market Station
2. Through the US Mail (1401 West Rose Street, Walla Walla, WA)
3. By calling 509-525-9140
4. By emailing info@valleytransit.com
5. Via fax at 509-525-9142
6. In person at the Valley Transit Main Office (1401 West Rose Street, Walla Walla, WA)
7. Via the Language Line (if speaking a language other than English or Spanish) Valley Transit will coordinate this service for customers upon request, or identification of a significant language barrier by staff.

Feedback Review Process

1. All feedback from customers is valued and will be reviewed and distributed to the appropriate agency representative(s).
2. Customer concerns, complaints, or employee commendations will be forwarded to the appropriate department manager.
3. Recommendations for service or system modifications will be sent to the Operations Manager or the General Manger. Questions regarding discrimination or bias will be sent to the Human Resource Department.

Feedback Acknowledgement

Anyone who submits a comment, complaint, or service suggestion to Valley Transit, and requests a response, will receive an initial response within 15 working days, provided legible and functional contact information is provided.

Information about Policy

Information about the Customer Comment Policy, including how to submit a complaint, will be made available to riders verbally by staff as well as being provided on www.valleytransit.com.

Reporting and Tracking

Staff will complete a summary of customer comments for the board and employees for use in reviewing and evaluating service(s). Valley Transit will maintain tracking software for the purpose of tracking all feedback from customers.

Protection from Retaliation

Valley Transit will ensure the quality of service for persons submitting feedback is not impacted negatively in any way after the submission of such feedback.

Appendix C: Public Outreach Efforts 2017-2019

Date of Event: February 22, 2017
Event: Public Hearing
Purpose: Exit Conference with presentations from the WA State Auditor's Office
Date of Publication: 2-14-17 Walla Walla Union Bulletin
2-16-17 LaVoz

Date of Event: March 31, 2017
Event: Advertisement for seeking bids
Purpose: Seeking bids to install small passenger waiting shelters
Date of Publication: 3-12-17 and 3-14-17 Walla Walla Union Bulletin
3-16-17 LaVoz

Date of Event: May 8, 2017 and May 10, 2017
Event: Public Hearing
Purpose: Solicit comments on Valley Transit's amended and updated Title VI Plan
Date of Publication: 4-2-17 Walla Walla Union Bulletin
3-30-17 LaVoz

Date of Event:
Event: Request for Proposals (RFP)
Purpose: Accept RFP packages for AVL System and Website
Date of Publication: 5-26-17 and 6-5-17 The Daily Journal of Commerce
5-26-17 and 6-5-17 Walla Walla Union Bulletin

Date of Event: June 15, 2017
Event: Public Hearing
Purpose: Solicit comments on the Transit Improvement Plan for 2018-2023 and the
Transit Development Plan for 2017-2022
Date of Publication: 6-4-17 Walla Walla Union Bulletin
6-8-17 LaVoz

Date of Event: August 17, 2017
Event: Public Hearing
Purpose: Solicit comments on the Transit Development Plan for 2017-2022,
projected capital improvements projects and the 2016 Annual Report
Date of Publication: 8-6-17 Walla Walla Union Bulletin

Date of Event: December 1, 2017
Event: Request for Proposals (RFP)
Purpose: Seeking proposals for snow removal (December through March) of 2017
& 2018
Date of Publication: 11-22-17 and 11-26-17 Walla Walla Union Bulletin

Date of Event: January 1, 2018
Event: Request for Qualifications (RFQ)
Purpose: Soliciting qualified firms for architects/engineers to design and support
construction of electric vehicle charging stations, CNG Station
modernization and code upgrades to the maintenance and bus storage
facilities.

Date of Publication: 12-10-17 Walla Walla Union Bulletin
12-7-17 LaVoz

Date of Event: April 16, 2018
Event: Request for Proposals
Purpose: Customer and Community Satisfaction Survey
Date of Publication: 3-30-18 and 4-1-18 Walla Walla Union Bulletin
4-5-18 LaVoz

Date of Event: July 18, 2018
Event: Advertisement for Bids
Purpose: Construction of the Main Facility Charging Station Installation project
Date of Publication: 6-21-18 and 6-28-18 Tri-City Herald
6-21-18 and 6-28-18 Walla Walla Union Bulletin

Date of Event: September 11, 2018
Event: Request for Proposals (RFP)
Purpose: Executive Search Services
Date of Publication: 8-24-18, 8-25-18 and 8-27-18 The Daily Journal of Commerce
8-24-18, 8-26-18 and 8-27-18 Walla Walla Union Bulletin

Date of Event: November 14, 2018
Event: Public Hearing
Purpose: Entrance Conference with presentations from the WA State Auditor's Office
Date of Publication: 11-7-18 Walla Walla Union Bulletin
11-8-18 LaVoz

Date of Event: December 7, 2018
Event: Request for Proposals (RFP)
Purpose: Video Production and Social Media Services
Date of Publication: 11-21-18 Walla Walla Union Bulletin
11-22-18 LaVoz

Date of Event: January 8, 2019
Event: Public Hearing
Purpose: Exit Conference with presentations from the WA State Auditor's Office
Date of Publication: 12-30-18 Walla Walla Union Bulletin
12-27-18 LaVoz

Date of Event: February 12, 2019
Event: Special Meeting of the Board of Directors
Purpose: Evaluate candidates for General Manager position
Date of Publication: 2-3-19 Walla Walla Union Bulletin
2-7-19 LaVoz

Date of Event: March 1, 2019
Event: Advertisement for Bids
Purpose: Construction of the Market Charging Station and Crawford Park Improvements
Date of Publication: 1-29-19 and 2-6-19 Walla Walla Union Bulletin

Date of Event: March 1, 2019
Event: Special Meeting of the Board of Directors
Purpose: Evaluate candidates for General Manager position
Date of Publication: 2-17-19 Walla Walla Union Bulletin
2-21-19 LaVoz

Date of Event: April 1, 2019
Event: Request for Proposals (RFP)
Purpose: Website Redesign, Development and Implementation Services
Date of Publication: 3-9-19 Daily Journal of Commerce
3-14-19 LaVoz
3-9-19 Walla Walla Union Bulletin

Date of Event: May 24, 2019
Event: Special Meeting of the Board of Directors
Purpose: Interview selected candidates for the General Manager position
Date of Publication: 5-19-19 Walla Walla Union Bulletin
5-23-19 LaVoz

Date of Event: June 6, 2019
Event: Special Meeting of the Board of Directors
Purpose: Interview selected candidates for the General Manager position
Date of Publication: 6-2-19 Walla Walla Union Bulletin

Date of Event: August 12, 2019
Event: Public Hearing
Purpose: Solicit comments on the Transit Development Plan for 2019-2024
Date of Publication: 8-7-19 Walla Walla Union Bulletin
8-8-19 LaVoz

Date of Event: August 27, 2019
Event: Public Hearing
Purpose: Exit Conference with presentations from the WA State Auditor's Office
Date of Publication: 8-18-19 Walla Walla Union Bulletin
8-22-19 LaVoz

Date of Event: October 17, 2019
Event: Public Hearing
Purpose: Review and solicit comment on updates to the Americans with Disabilities Act (ADA) Policy
Date of Publication: 9-23-19 and 10-6-19 Walla Walla Union Bulletin
9-26-19 and 10-3-19 LaVoz

Appendix D: Valley Transit Public Participation Contact List

Depending on the situation and the relevance, Valley Transit may engage any of the following contacts within the community.

- Aging & Long Term Care
- Blue Mountain Action Council
- Children and Family Services of Walla Walla
- City of College Place
- City of Walla Walla
- City of Walla Walla Housing Authority
- College Place School District
- Downtown Walla Walla Foundation
- Family Medical Clinic of Walla Walla
- Helpline (Services for those in need)
- Lillie Rice Center (Job Training for Developmentally Disabled Adults)
- Local City & County Clerk Offices: Walla Walla County, Walla Walla City, College Place City
- of Vocational Rehabilitation
- Port of Walla Walla County (Economic Development)
- Providence St. Mary Medical Center
- SonBridge
- United Blind of Walla Walla
- United Way of Walla Walla
- Veterans Medical Center
- Walla Walla Branch-Department of Social and Health Services
 - Division of Children and Family Services
 - Division of Developmental Disabilities
 - Division of Vocational Rehabilitation
 - Home and Community Services Division
 - Welfare/Community Services Office
- Walla Walla Chamber of Commerce
- Walla Walla Community College
- Walla Walla County
- Walla Walla County Sheriff Department
- Walla Walla General Hospital
- Walla Walla Police Department
- Walla Walla Public Schools
- Walla Walla Public Schools Homeless Family Advocate Program
- Walla Walla University
- Walla Walla Valley MPO & RTPO offices
- Whitman College
- WorkSource (Employment Development)
- YMCA
- YWCA

Appendix E: 2018 Census Data Walla Walla County

| All Topics ▼ | | Walla Walla County, Washington × |
|---|--|---|
| i Population estimates, July 1, 2018, (V2018) | | 60,922 |
| PEOPLE | | |
| Population | | |
| i Population estimates, July 1, 2018, (V2018) | | 60,922 |
| i Population estimates base, April 1, 2010, (V2018) | | 58,781 |
| i Population, percent change - April 1, 2010 (estimates base) to July 1, 2018, (V2018) | | 3.6% |
| i Population, Census, April 1, 2010 | | 58,781 |
| Age and Sex | | |
| i Persons under 5 years, percent | | ▲ 5.5% |
| i Persons under 18 years, percent | | ▲ 21.0% |
| i Persons 65 years and over, percent | | ▲ 18.1% |
| i Female persons, percent | | ▲ 48.9% |
| Race and Hispanic Origin | | |
| i White alone, percent | | ▲ 91.3% |
| i Black or African American alone, percent (a) | | ▲ 2.3% |
| i American Indian and Alaska Native alone, percent (a) | | ▲ 1.4% |
| i Asian alone, percent (a) | | ▲ 1.8% |
| i Native Hawaiian and Other Pacific Islander alone, percent (a) | | ▲ 0.4% |
| i Two or More Races, percent | | ▲ 2.8% |
| i Hispanic or Latino, percent (b) | | ▲ 21.5% |
| i White alone, not Hispanic or Latino, percent | | ▲ 71.4% |
| Income & Poverty | | |
| i Median household income (in 2018 dollars), 2014-2018 | | \$56,533 |
| i Per capita income in past 12 months (in 2018 dollars), 2014-2018 | | \$27,835 |
| i Persons in poverty, percent | | ▲ 13.3% |

Appendix F: 2018 Census Data VT Service Area

| All Topics | College Place city, Washington | Walla Walla city, Washington |
|--|--------------------------------|------------------------------|
| Population estimates, July 1, 2018, (V2018) | 9,358 | 32,986 |
| PEOPLE | | |
| Population | | |
| Population estimates, July 1, 2018, (V2018) | 9,358 | 32,986 |
| Population estimates base, April 1, 2010, (V2018) | 8,787 | 32,439 |
| Population, percent change - April 1, 2010 (estimates base) to July 1, 2018, (V2018) | 6.5% | 1.7% |
| Population, Census, April 1, 2010 | 8,765 | 31,731 |
| Age and Sex | | |
| Persons under 5 years, percent | △ 6.1% | △ 4.9% |
| Persons under 18 years, percent | △ 18.3% | △ 20.7% |
| Persons 65 years and over, percent | △ 18.8% | △ 15.8% |
| Female persons, percent | △ 51.8% | △ 48.6% |
| Race and Hispanic Origin | | |
| White alone, percent | △ 85.0% | △ 82.2% |
| Black or African American alone, percent (a) | △ 0.8% | △ 2.2% |
| American Indian and Alaska Native alone, percent (a) | △ 0.7% | △ 1.3% |
| Asian alone, percent (a) | △ 1.1% | △ 2.2% |
| Native Hawaiian and Other Pacific Islander alone, percent (a) | △ 0.2% | △ 0.1% |
| Two or More Races, percent | △ 3.0% | △ 5.6% |
| Hispanic or Latino, percent (b) | △ 17.2% | △ 24.6% |
| White alone, not Hispanic or Latino, percent | △ 77.3% | △ 66.5% |
| Income & Poverty | | |
| Median household income (in 2018 dollars), 2014-2018 | \$47,525 | \$48,678 |
| Per capita income in past 12 months (in 2018 dollars), 2014-2018 | \$24,349 | \$23,908 |
| Persons in poverty, percent | △ 15.8% | △ 17.0% |

Appendix G: Minority Representation on Committees

Valley Transit does not currently have non-elected citizen committees, but holds open public meetings once a month and always send the agenda to a local Spanish language newspaper (such as La Voz) as well as publishing additional special notices when any policy or practice changes are being discussed.