

Livermore Amador Valley **TRANSIT AUTHORITY**



2022 Title VI Program

April 8, 2022 Submission Date

Last Report Cycle

Submission Date: May 29, 2019

Acceptance Date: June 25, 2019

TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
TITLE VI ANNUAL CERTIFICATIONS AND ASSURANCES.....	2
TITLE VI PROGRAM.....	3
NOTIFY BENEFICIARIES OF PROTECTION UNDER TITLE VI.....	3
TITLE VI DISCRIMINATION COMPLAINT PROCEDURES	
How To Make A Complaint.....	3
Title VI Complaint Procedures.....	3
TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS	
RECORDS.....	4
PUBLIC PARTICIPATION PLAN.....	4
LANGUAGE ASSISTANCE TO PERSONS WITH LIMITED	
ENGLISH PROFICIENCY.....	5
RACIAL BREAKDOWN OF LAVTA’S APPOINTED COMMITTEES.....	6
REPORTING SUBRECIPIENT COMPLIANCE.....	7
EQUITY ANALYSIS FOR THE LOCATION OF NEW CONSTRUCTION.....	7
SERVICE STANDARDS AND POLICIES.....	7
Qualitative Service Standards.....	7
Quantitative Service Standards.....	10
 <u>APPENDICES</u>	
Appendix A: Title VI Notice	
Appendix B: Title VI Complaint Instructions	
Appendix C: Title Complaint Form	
Appendix D: Public Participation Plan	
Appendix E: LEP Plan	
Appendix F: Board Approval of Title VI Program	

TITLE VI ANNUAL CERTIFICATIONS AND ASSURANCES

In accordance with 49 CFR Section 21.7(a), with every application for financial assistance from the Federal Transit Administration (FTA), the Livermore Amador Valley Transit Authority (LAVTA) submits an assurance that it will carry out the program in compliance with DOT's Title VI regulations. LAVTA also submits its Title VI assurance as part of its annual Certifications and Assurances to the FTA, assuring compliance with laws and regulations so that no person in the United States will be denied the benefits of, or otherwise be subjected to discrimination in any U.S. DOT or FTA funded program or activity, particularly in the level and quality of transportation services and transportation-related benefits, on the basis of race, color, or national origin.

TITLE VI PROGRAM

NOTIFY BENEFICIARIES OF PROTECTION UNDER TITLE VI

LAVTA posts a Title VI notice to inform the public that the agency complies with Title VI regulations and to provide information about how Title VI protects the public from discrimination based on race, ethnicity and national origin. This notice is posted on the LAVTA website, in public areas at LAVTA's Administration & Operations Facility on Rutan Court, on all LAVTA's revenue vehicles, on LAVTA's paratransit contractor's vehicles, and at LAVTA's Livermore Transit Center. It is also printed in the Fares and Policies brochure, which contains information on fares, accessibility, locations where discount tickets and passes are sold, and general riding information, provided for free to the public. The notice is posted in English, Spanish, Chinese, Korean, and Tagalog at LAVTA's Administrative Office, at the Livermore Transit Center and on the LAVTA website. A copy of this Title VI notice in English, Spanish, Chinese, Korean, and Tagalog is provided as Appendix A.

TITLE VI DISCRIMINATION COMPLAINT PROCEDURES

How to Make a Complaint

LAVTA provides instructions on how to find additional information on LAVTA's Title VI Program and how to file a claim of discrimination via our website, www.wheelsbus.com. Instructions on how to file a claim of discrimination are available in English, Spanish, Chinese, Korean, and Tagalog on the website. The public is instructed to call or visit the Administrative Office for more information. A copy of the instructions is provided as Appendix B.

A complaint form is also provided in English, Spanish, Chinese, Korean, and Tagalog on the website and can be downloaded from the website or provided by the Title VI Coordinator. Verbal complaints are also accepted and transcribed by the Title VI Coordinator. A copy of the LAVTA Title VI complaint form is provided as Appendix C.

Title VI Complaint Procedures

LAVTA has a file established for all Title VI complaints. This file is stored at the LAVTA office located at 1362 Rutan Court, Suite 100, Livermore, CA. All complaints are investigated by LAVTA's third-party claims adjuster or legal counsel. A record of the investigation accompanies a copy of the original complaint in the case file. Additionally, any notification of legal action, as well as the results of any legal action, will be filed with the original complaint and investigation documents.

Procedures

1. Upon receipt of a complaint regarding a violation of civil rights, a case folder is created with the name of the person filing the complaint and the date of the filing.
2. A copy of the complaint is placed in the case folder.
3. The case folder is filed within the Title VI file.
4. The original complaint is submitted to LAVTA's third-party claims adjuster for an investigation.

5. Any additional correspondence from the person filing the complaint will be handled in the same manner with a copy being placed in their case folder.
6. Any correspondence from the third-party claims adjuster or legal counsel pertaining to the claim will also be filed in the case folder.
7. If the third-party claims adjuster determines it necessary, they will forward the claim to legal counsel.

TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS RECORDS

There have been no Title VI complaints, investigations, or lawsuits since the last Title VI submittal in May 2019.

PUBLIC PARTICIPATION PLAN

The LAVTA Public Participation Plan is included as Appendix D. Included in the plan is the LAVTA Board of Directors-adopted Public Hearing Policies and Procedures, as well as an Outreach Toolbox. The Public Participation Plan ensures that there is a process established to solicit and consider public comment prior to raising fares or implementing a major reduction of transit services, and that outreach to minority and/or limited English proficient (LEP) populations occurs during every public comment period. The Outreach Toolbox identifies a multi-faceted approach to reaching diverse populations within the LAVTA service area, including the LEP and minority populations. The Public Participation Plan has been used to inform decisions on outreach in other situations, and will be updated as needed to reflect current best practices and community needs and resources.

Solicitations for Public Input Since Last Title VI submission

LAVTA has conducted just one solicitation for public input since our last Title VI submission in May 2019. Following the start of the pandemic in March 2020, LAVTA reduced service on two occasions. The reductions took place in March and April as summarized below:

March 26, 2020 - As a result of the ridership impacts of the COVID-19 Shelter at Home Order, the following changes were implemented:

- Rapid Routes 10R and 30R began operating on a 30-minute frequency during hours when 15-minute frequency was previously offered
- Routes 20X and 580X were suspended due to extremely low ridership with alternate service available using Route 30R
- Route 2 was suspended due to extremely low ridership with alternate service available using LAVTA's GoDublin program

April 6, 2020 - As a result of the continuing ridership impacts of the COVID-19 Shelter at Home Order, the following changes were implemented:

- All service reductions from March 26 were continued
- Routes 1, 3, 8, 14 and 15 began operating on weekend schedules
- Routes 11 and 70X were added to the list of suspended services
- All service after 11pm was suspended

Because these emergency service reductions lasted more than 180 days, LAVTA's Public Participation Plan called for a public input process. The public input period commenced upon Board authorization on December 7, 2020 and continued through January 20, 2021. Public notification of the input process included:

- Notices posted in multiple locations on all buses, translated in five languages (English, Spanish, Chinese, Korean and Tagalog)
- Advertisements placed in the Pleasanton Weekly and Livermore Independent and published on two occasions in both papers.
- A press release
- A notice posted on Nextdoor
- Postings on our wheelsbus.com website, Facebook and Twitter

Comments were accepted via postal mail, email, and fax. In response to this solicitation of public input, one response was received, and it ended "...Personally, I'm just glad Wheels is still running! Keep up the good work."

Public Outreach

LAVTA has participated in the following types of outreach events since its last Title VI submission (in most cases prior to the start of the pandemic):

- Public meetings/workshops
- Social media campaigns
- School registration days
- Employer sponsored job and transit fairs
- Community events, such as parades and festivals
- School presentations
- Pop-up events at transit hubs
- Take One brochures
- Car Cards inside buses
- Web postings
- Media press releases
- Senior housing presentations
- Mass mailings to targeted audiences
- Local radio announcements
- Print advertisements and notices

[LANGUAGE ASSISTANCE TO PERSONS WITH LIMITED ENGLISH PROFICIENCY](#)

A copy of the LAVTA Limited English Proficiency (LEP) Plan is provided as Appendix E. The plan was updated in 2022 in preparation for this 2022 Title VI submission.

RACIAL BREAKDOWN OF LAVTA’S APPOINTED COMMITTEES

LAVTA currently has one appointed advisory committee, the Tri-Valley Accessibility Advisory Committee (TAAC), which consists of eleven members. The three cities in the LAVTA service area, Dublin, Pleasanton, and Livermore, have two members each. The County of Alameda has one member. There are three members who are representatives of Tri-Valley social service agencies, and one member who represents Alameda County’s Paratransit Advisory and Planning Committee (PAPCO). The Committee also includes one alternate member for each city, and one alternate member representing the County of Alameda.

The current racial breakdown, as provided by the membership, is provided below. For purposes of this analysis, LAVTA considers a minority person to be any person who identifies as non-white. The names of the members have been replaced with letters of the alphabet for anonymity. Including alternates, the current non-white representation on the committee is 19.65%

Table 1. Racial Breakdown of the Tri-Valley Accessibility Advisory Committee
(As of April 2022)

Committee Members	White	African American/ Black	American Indian	Hispanic, Puerto Rican	Other - Caribbean Indian	Asian Indian	Total Non-White
A	1						0
B		1					1
C	1						0
D	.25		.25	.25	.25		.75
E	1						0
F	1						0
G	1						0
H	1						0
I	1						0
J	1						0
K (vacant)							n/a
Committee Only Percentages	82.25%	10.0%	0.25%	0.25%	0.25	0%	10.75%
L (alternate)	1						1
M (alternate)						1	0
N (alternate)	1						0
O (alternate)	1						0
Combined Committee and Alternate Percentages	80.35%	7.1%	1.78%	1.78%	1.78%	7.1%	19.65%

REPORTING SUBRECIPIENT COMPLIANCE

Not applicable as LAVTA has no subrecipients.

EQUITY ANALYSIS FOR THE LOCATION OF NEW CONSTRUCTION

No new facilities have been located and/or constructed since the last Title VI Program Submission. LAVTA will conduct the required equity analysis for facilities siting whenever future new facilities are considered.

FIXED ROUTE TRANSIT PROVIDER REQUIREMENTS

LAVTA is a fixed route transit provider for a service area divided between two UZAs, Concord and Livermore. The Livermore UZA is a small UZA with a population of less than 200,000. LAVTA operates a peak pull of 7 vehicles in the Livermore UZA. The Concord UZA is a large UZA with a population of more than 200,000. LAVTA operates a peak pull of 32 vehicles in the Concord UZA. Under these parameters, LAVTA is considered a small operator and is required to set and report system-wide service standards and system-wide policies as part of its Title VI Program.

SERVICE STANDARDS AND POLICIES

The service standards and policies contained herein are used to develop and maintain efficient and effective fixed-route transit service.

Quantitative Service Standards

The FTA requires all fixed-route transit providers of public transportation to develop quantitative standards for the following indicators. Individual public transportation providers set these standards; therefore, these standards will apply to each individual agency rather than across the entire transit industry:

- A. Vehicle Load
- B. Vehicle Headways
- C. On-time Performance
- D. Service Availability

For the purposes of defining service standards and policies for LAVTA fixed-route service, the agency has split its system into four route classifications:

- **Primary (Trunk) Routes:** Trunk routes are typically direct and operate along main arterials, constituting a primary form of local fixed-route bus service. Typically, trunk routes operate every 15 to 30 minutes on weekdays, with a relatively long service span.
- **Regional Express Routes:** Regional Express routes provide direct service during peak commute hours, focusing on linking cities or neighborhoods with high concentrations of passengers traveling to a specific employment area or major transit hub.
- **Neighborhood Feeders:** Feeder buses are designed to “feed” trunk routes and intercity express bus services. They often cover shorter distances and typically have longer headways.

- School Trippers:** School trippers look like neighborhood feeders, but are designed to serve a specific market – students – and are often provided as a way to address what would be overcrowding on primary and neighborhood feeder routes. These routes are open to the general public, but run very limited schedules on school days only.

The classifications were not developed to, and in fact do not, differentiate routes by minority or income status of the areas or passengers served. The following chart illustrates which routes belong to each classification:

Table 2: Route Classification

Route Classification	LAVTA Routes
Primary	Rapid (30R), Rapid (10R)
Regional Express	20x, 70x, 580x
Neighborhood Feeder	1, 2, 3, 8, 11, 14, 15, 53, 54
School Tripper	501A, 501B, 501C, 502, 503, 504, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611

LAVTA also defines service standards differently for peak and off-peak service. “Off-peak” refers to weekday, midday, and evening service, as well as Saturday, Sunday, and Holiday service. “Peak” refers to weekday commute periods, generally 6 am to 9 am and 3:30 pm to 6:30 pm.

The chart below shows LAVTA’s current service standards, which were approved by the Board in 2016 as a part of the Short Range Transit Plan.

System-wide Service Standards by Mode – 2016 Short Range Transit Plan

Service Standard	Modes			
	Primary	Regional Express	Neighborhood Feeder	School Tripper
Vehicle Load	60 riders (1.5x seated capacity)	40 riders (1x seated capacity)	60 riders (1.5x seated capacity)	60 riders (1.5x seated capacity)
Headway	15 min during peak and midday hours on weekdays; 30-60 min off-peak	30 min during peak periods, weekdays only	30 min peak, 60 min off-peak; 40-60 min off-peak for route 3	single daily roundtrip for school tripper lines
On-time Performance	>85% as defined by departing a timepoint zero minutes early, and zero to five minutes late	>85% as defined by departing a timepoint zero minutes early, and zero to five minutes late	>85% as defined by departing a timepoint zero minutes early, and zero to five minutes late	>85% as defined by departing a timepoint zero minutes early, and zero to five minutes late
Service availability				
Service hours distribution	Distribute service hours proportionately with the population of the cities of Dublin, Livermore, and Pleasanton, respectively, within +/- 15%	Distribute service hours in the peak direction during peak hours	Distribute service hours proportionately with the population of the cities of Dublin, Livermore, and Pleasanton, respectively, within +/- 15% Provide service within a quarter-mile (400m) radius of medium- to high-density residential areas, and to 80% of 100+ employee locations	Distribute service hours during school days only, providing one or two trips in the morning and afternoon
Bus Stop spacing	Maintain bus stop spacing of 1 mile (1600m)	No standard. Express routes are defined as providing direct service to and from major hubs	Maintain bus stop spacings of 1/3 mile (500m), except where on undeveloped or freeway segments	No standard

Qualitative Service Standards

The FTA also requires all fixed-route transit providers of public transportation to develop qualitative standards for bus stop amenities and vehicle assignment. As with the quantitative standards, individual public transportation providers set their own qualitative standards.

Bus Stop Amenities

The following 10 point system is used as a decision making tool at the planning level to determine which bus stops will be prioritized for improvements when the financial resources are available. If a bus stop meets the amenities criteria it may be considered for a shelter or bench and trash receptacle placement. Meeting these criteria does not guarantee shelter installation. Existing site conditions and pedestrian infrastructure, public right-of-way availability, accessibility and safety issues, and other concerns must be reviewed and addressed before future shelter or bench placements are confirmed.

Bus stops that accumulate 10 points or more may be considered for shelter placement; 6 points or more may warrant a bench and trash receptacle.	
• 7 points	High boarding count or transfer location - Number of patrons getting on the bus at this stop exceeds 20 people per day.
• 4 points	Special needs – Includes small facilities or people with special requirements for shelter that might not qualify for attention based on boarding counts (senior citizen centers, medical offices, libraries, persons with certain disabilities, etc.).
• 4 points	Activity Location - Locations with high density of people and thus high potential for ridership (apartments, high rise office building, shopping center, schools, hospitals).
• 3 points	Exposure to elements – Locations with no landscape or buildings to offer shade/rain protection, no seat walls, no area to stand outside of sidewalk, and 2-3 lanes of traffic of 40 mph or more, giving patron no feeling of security at stop.
• 2 points	Long waiting time for bus – stops at which patrons wait 30 minutes or more between buses.
• 1 point	Request for improvement – Citizen requests improvements at stop.

Note: The criteria serve to direct LAVTA’s limited resources when not every location can be improved.

Vehicle Assignment

Rapid Service Subfleet

The Rapid Routes 10R and 30R have branded hybrid electric vehicles dedicated to its service. There is a fleet of four 30’, seven 35’, and twelve 40’ buses assigned to the Rapid service. The vehicles are rotated evenly throughout the route to ensure that the electric batteries are maintained. The 30’ buses are assigned to runs with the least vehicle loads to avoid crowding.

Wheels Service Subfleet

All LAVTA vehicles that are not part of the Rapid subfleet are branded as Wheels buses. They are ADA accessible, have full climate control systems for heating and air conditioning, and feature bus stop and directional announcements. The Wheels subfleet consists of 30', 35', and 40' buses of varying age rotate among routes, except when required otherwise due to operational constraints.

Review of Service Standards and Monitoring

LAVTA plans to conduct a review of current service standards as well as monitoring of existing standards as part of its 2022 Short Range Transit Plan (SRTP) to ensure that the service standards detailed in this policy are implemented in a nondiscriminatory manner. The development of this SRTP has been impacted by the pandemic and is expected to be complete by July 2022.