



## RESOLUTION No. 22-32

### A RESOLUTION OF THE NAPA VALLEY TRANSPORTATION AUTHORITY (NVTA) ADOPTING THE REVISED 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, establishing requirements and guidelines for Title VI compliance; and

**WHEREAS**, the above-referenced Circular details required elements of a Title VI Program Report that each FTA grant recipient must submit to FTA every three (3) years to verify compliance with Title VI;

**WHEREAS**, NVTA's submitted an updated program report to FTA on November 27, 2019; and

**WHEREAS**, NVTA's Title VI Program was awarded concurrent status on July 28, 2022 by FTA, pending compliance with additional requirements; and

**WHEREAS**, NVTA has revised the Title VI Program Plan, in response to the Review Assessment to ensure 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 Revised 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; and

2. 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 16, 2022, by the following vote:

Passed the 16<sup>th</sup> day of November, 2022.

  
Liz Alessio, NVTA Chair

Ayes Garcia(2), Joseph(2),  
Canning(1), Kraus(1),  
Alessio(5), Sedgley(5),  
Dohring(1), Ellsworth(1),  
Tagliaboschi(1), Dunbar(1)

Nays:  
None

Absent: Pedroza(2), Ramos(2)

ATTEST:

  
\_\_\_\_\_  
Laura Sanderlin, NVTA Board Secretary

APPROVED:

  
\_\_\_\_\_  
Osman Mufti, NVTA Legal Counsel



## TITLE VI PROGRAM POLICY

\_\_\_\_\_  
Liz Alessio, NVTA Chair

Date \_\_\_\_\_

**NVTA Board Approved 11/16/2022**

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# 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 Laura Sanderlin Civil Rights Officer, Napa Valley Transportation Authority, 625 Burnell Street, Napa CA, 94558; at (707) 259-8631, or by email to [lsanderlin@nvta.ca.gov](mailto:lsanderlin@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 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 monitoring process was last formally utilized when NVTa deployed a major service change to the local City of Napa routes A-H in January 2020. The COVID-19 pandemic resulted in a number of changes to its transit service, however, most of the changes were temporary and resulted in decreasing frequencies and hours of operation as opposed to outright eliminating service. For example, Routes 10 and 11 were temporarily operating on a Saturday

schedule on weekdays.

**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 <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.

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](http://www.nvta.ca.gov) and [www.vinetransit.com](http://www.vinetransit.com)).

- b. 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, 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 is posted in other languages when a significant number of the population in non-English speaking. NVTA's websites are also linked to the Google translator which can provide translation in over 70 languages.

## **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 Administration's 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 relationships 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 at its in-person, virtual, and hybrid public meetings, 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, U.S. mail, in person, via teleconference or at any open meeting. An example of this:

- The public is notified of monthly NVTA Board and Committee meetings. The public is invited to attend these meetings (currently either in-person or virtually). 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 regularly posts on its website and physically posts on the buses and at all impacted stops all service change information to cultivate public relations.

### **d. STAFF ACCESSIBILITY**

Staff is accessible in person, on the phone, by mail, by fax, teleconferencing, 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 NVTa 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 NVTa may file a written complaint with the Civil Rights Officer. The complaint form (Appendix 3) may be found on the NVTa website by clicking the following links:

- <https://vinetransit.com/title-vi-complaint-form/> (online form)
- <https://vinetransdev.wpengine.com/wp-content/uploads/2020/09/Title-VI-Program-Policy-Appendix-3-TITLE-VI-Compliant-Form-20-22.pdf> (downloadable form)

It is also available as a hard copy from the NVTa office at 625 Burnell Street, Napa, CA 94559. 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. NVTa will provide the complainant or his/her representative and any contractor (respondent) with a written acknowledgement that NVTa 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 NVTa or NVTa 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 NVRTA 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 NVRTA 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 zero (0) formal 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. There were two complaints that were initially categorized to be Title VI, but upon investigation they did not meet the appropriate Title VI thresholds. 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 NVRTA.

## **FACILITY SITE EQUITY ANALYSIS**

NVRTA did not complete construction of any facilities during the current Title VI program, but NVRTA did acquire a site for use for a future new maintenance facility during the previous Title VI program cycle. NVRTA acquired two parcels within Napa County totaling 8.08 acres (APN 057-250-025 and APN 057-250-03). In addition, in February of 2020, NVRTA acquired an additional 2.40 acres (APN: 057-250-037), which will be used if NVRTA needs to expand its facilities in the future. All the properties were 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. Construction of the new maintenance facility commenced in January 2021 and the anticipated completion date is December 2023.

NVRTA completed a Real Estate Acquisition Management Plan (RAMP) in August 2016 so that the public had access to the process the NVRTA used for its real estate acquisition needs. NVRTA 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, NVRTA 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 previous Short Range Transit Plan (FY 2016-2026) (Appendix 4).

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.

Under FTA's Title VI Circular 4702.1B, transit providers that operate 50-or-more fixed routes in peak service and are located in an urbanized area (UZA) with a population of 200,000 or more, must perform a service equity analysis whenever they make a major service change. Temporary service changes in response to an emergency (such as the COVID-19 pandemic) do not rise to the level of a major service change, so a service equity analysis is not required. Since NVTa does not operate 50 or more fixed routes in peak service and no major changes have been made, no equity analysis has been conducted since the previous Title VI Program Policy was approved.

## **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 NVT A 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 NVT A Resolution 16-23 approving the NVT A Title VI Program Policy
- Appendix 9 Title VI Evidence of Website Posting



## **Language Assistance Plan to Limited English Proficient (LEP) Populations**

**November 2022**

**Also available in Spanish and Filipino**

**Napa Valley Transportation Agency  
625 Burnell Street  
Napa, CA 94559  
[info@nvta.ca.gov](mailto: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 (NVTa)**

## **Introduction**

The Napa Valley Transportation Authority (NVTa) 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. NVTa's service area includes a population of 112,600 residents, 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, NVTa 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 NVTa's jurisdiction.

A Language Assistance Plan starts with an assessment to identify LEP individuals who need assistance. NVTa 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 2016-2020 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 American Community Survey (ACS) 5 Year survey data identifies people who speak English “less than very well” as Limited English Proficient persons. The survey data is broken down by the languages spoken at home, and by ability to speak English, for persons five (5) years of age and older. For Napa County, the ACS data indicates that approximately 34 percent of the residents identified as speaking a “language other than English”. For those whose primary language is categorized as “Spanish or Spanish Creole”, approximately half were identified as speaking English “less than very well”. The ACS study data also indicates that nearly 40% of people whose primary language is Asian and Pacific Islanders in Napa County speak English “less than very well”.

Table 1: Language Spoken at Home

|                                    | % of Specified Language Speakers | Speak English Less than “Very Well” |
|------------------------------------|----------------------------------|-------------------------------------|
| <b>Population 5 Years and Over</b> | 131,730                          |                                     |
| English Only                       | 65.8%                            | N/A                                 |
| Language other than English        | 34.2%                            | 42.6%                               |

|                                      |       |       |
|--------------------------------------|-------|-------|
| Spanish                              | 26.5% | 45.6% |
| Other Indo-European languages        | 3.1%  | 26.1% |
| Asian and Pacific Islander languages | 4.2%  | 36.1% |
| Other Language                       | 0.4%  | 38.4% |

- The ACS data above estimates the total population over the age of five in Napa County: 131,730
- 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: 45,103 or 34.2% of the population.
- The ACS data above estimates the total number of LEP persons (those who speak English less than “very well”) in Napa County is estimated to be:19,219 or 14.6% 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](http://www.nvta.ca.gov) and [www.vinetransit.com](http://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 most critical information available in Spanish. Customer service personnel all speak English, with some speaking Spanish as well as 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:

- Information in Spanish and Filipino and links for users about browser translation will be included on the new rehailed NVTa website, which is currently in Beta.
- Translate more printed information disseminated to the public into Filipino (currently only translated into Spanish).
- Advertise in more media outlets that target languages other than English, Spanish and Filipino.
- 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 routine 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. 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 has Spanish and Filipino-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.

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, Puertas Abiertas, 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 continues to expand community outreach efforts agency-wide.

## **A. 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.

## **B. 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.

## **C. 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.

## **D. 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 NVTAs 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.
- Include Spanish translations on the categories listed the online comment form, which is via the HappyFox software
- 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.

## **E. 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.

## **F. Dissemination of Plan**

This plan is available on the NVTA website’s at [www.nvta.ca.gov](http://www.nvta.ca.gov) and [www.vinetransit.com](http://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.

## **G. Contact Information**

Questions or comments about this plan may be submitted to:

Napa Valley Transportation Agency ATTN: Civil Rights Officer  
625 Burnell Street

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Napa, CA 94559  
(707) 259-8631  
(707) 259-8638

Published: 11/2022

APPENDIX 2



**Title VI/Environmental Justice/Public Participation Plan**

**November 2022**

**Also available in Spanish and Filipino**

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



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## 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 reports<sup>1</sup> indicate that Napa County fares better than many parts of the state: average rates of poverty in Napa County are below state averages and median income is higher than the state median across all categories (households, families, married-couple families and nonfamily households). 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.

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<sup>1</sup> U.S. Census, 2020: American Communities Survey 5-Year 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 the 2020 American Community Survey 5-Year Estimates, approximately 138,572 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 thoroughly reviewed its previous Title VI Plans to help facilitate an understanding of how inclusivity was previously and currently incorporated in the planning process, both before the COVID-19 pandemic and during when more of the planning process and outreach shifted to a virtual environment. This effort also included an attempt to thoroughly account for all minority and low-income populations served by NVTA through the use of updated American Community Survey data. As described in the 2022 Language Assistance Plan developed by NVTA, 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 Bay Area Rapid Transit (BART) Station in the City of El Cerrito. According to the 2020 American Community Survey 5-Year Estimates for Napa County, the total population was estimated to be 138,572 residents. The City of Napa has the largest population, followed by the cities of American Canyon, St. Helena, Calistoga and Yountville as shown below.

|              |        |
|--------------|--------|
| City of Napa | 78,294 |
|--------------|--------|



|                               |         |
|-------------------------------|---------|
| American Canyon               | 20,256  |
| St. Helena                    | 6,049   |
| Calistoga                     | 5,346   |
| Yountville                    | 3,001   |
| Total Incorporated Population | 112,946 |

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. Their total population was estimated to be 25,626:

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

## B. DEMOGRAPHICS

NVTa reviewed updated 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 study<sup>2</sup>, “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 34% of Napa County residents identify themselves as Hispanic or Latino, and another 7.6% 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.

<sup>2</sup> “Profiles of Immigrants in Napa County”, Migration Policy Institute, May 2012, <https://www.immigrationresearch.org/system/files/Napa-Profile.pdf>



A breakdown of the racial demographics in Napa County, as measured during the 2020 American Community Survey 5-Year Estimates, are shown in **Table 1** below:

**Table 1: Racial Demographics in Napa County**

|   |                |       |
|---|----------------|-------|
| <b>Total Population</b>                 | <b>138,572</b> |       |
| <b>One Race</b>                         | 128,572        | 93.0% |
| <b>White</b>                            | 98,614         | 71.2% |
| <b>Black or African American</b>        | 2,862          | 2.1%  |
| <b>American Indian or Alaska Native</b> | 961            | 0.7%  |
| <b>Asian</b>                            | 10,485         | 7.6%  |
| <b>Native Hawaiian or Other Pacific</b> | 261            | 0.2%  |
| <b>Two or more Races</b>                | 9,742          | 7.0%  |
| <b>Hispanic or Latino (of any race)</b> | 47,300         | 34.1% |

(Source: US Census, 2020 American Community Survey 5-Year Estimates, Napa County Table DP05)

Outside of the Napa County service area, Hispanic or Latino peoples comprise approximately 28% of the population in the Solano County cities of Fairfield and Suisun.

## C. LANGUAGE

In Napa County, approximately 85% 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 17%, 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 for the Population 5 Years and Over**

|  |     |
|--|-----|
| <b>Speak English Very Well</b>             | 85% |
| <b>Speak English Less Than Very Well</b>   | 15% |
| <b>Speak only English</b>                  | 66% |
| <b>Speak a language other than English</b> | 34% |
| <b>Spanish or Spanish Creole</b>           | 27% |
| <b>Other Indo-European languages</b>       | 5%  |
| <b>Asian and Pacific Island languages</b>  | 16% |
| <b>Other languages</b>                     | 3%  |

(Source: US Census Bureau, 2020 American Community Survey 5 Year Estimates, Napa County, Table C16001)

Please see the NVTAs 2022 Language Assistance Plan for Limited English Proficient (LEP) Populations for more information.

## D. ECONOMIC CHARACTERISTICS

According to the California Employment Development Department, there was an average labor force of 72,408, employment of 69,142 and an unemployment rate of 4.6% in Napa County in the years 2016-2020 (the same time period as the 2020 ACS 5 Year Estimates). Of these workers, 1.0% 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 48,484 households in Napa County. An analysis of income per household is presented in **Table 3**.

**Table 3: Household Income in Napa County**

| Total Households       | 48,484 |        |
|------------------------|--------|--------|
| Less than \$10,000     | 1,600  | 3.30%  |
| \$10,000 to \$14,999   | 1,309  | 2.70%  |
| \$15,000 to \$24,999   | 2,521  | 5.20%  |
| \$25,000 to \$34,999   | 2,958  | 6.10%  |
| \$35,000 to \$49,999   | 4,654  | 9.60%  |
| \$50,000 to \$74,999   | 6,982  | 14.40% |
| \$75,000 to \$99,999   | 5,770  | 11.90% |
| \$100,000 to \$149,999 | 9,018  | 18.60% |
| \$150,000 to \$199,999 | 5,721  | 11.80% |
| \$200,000 or more      | 7,951  | 16.40% |

(Source: US Census Bureau, American Community Survey 2016-2020, Napa County)

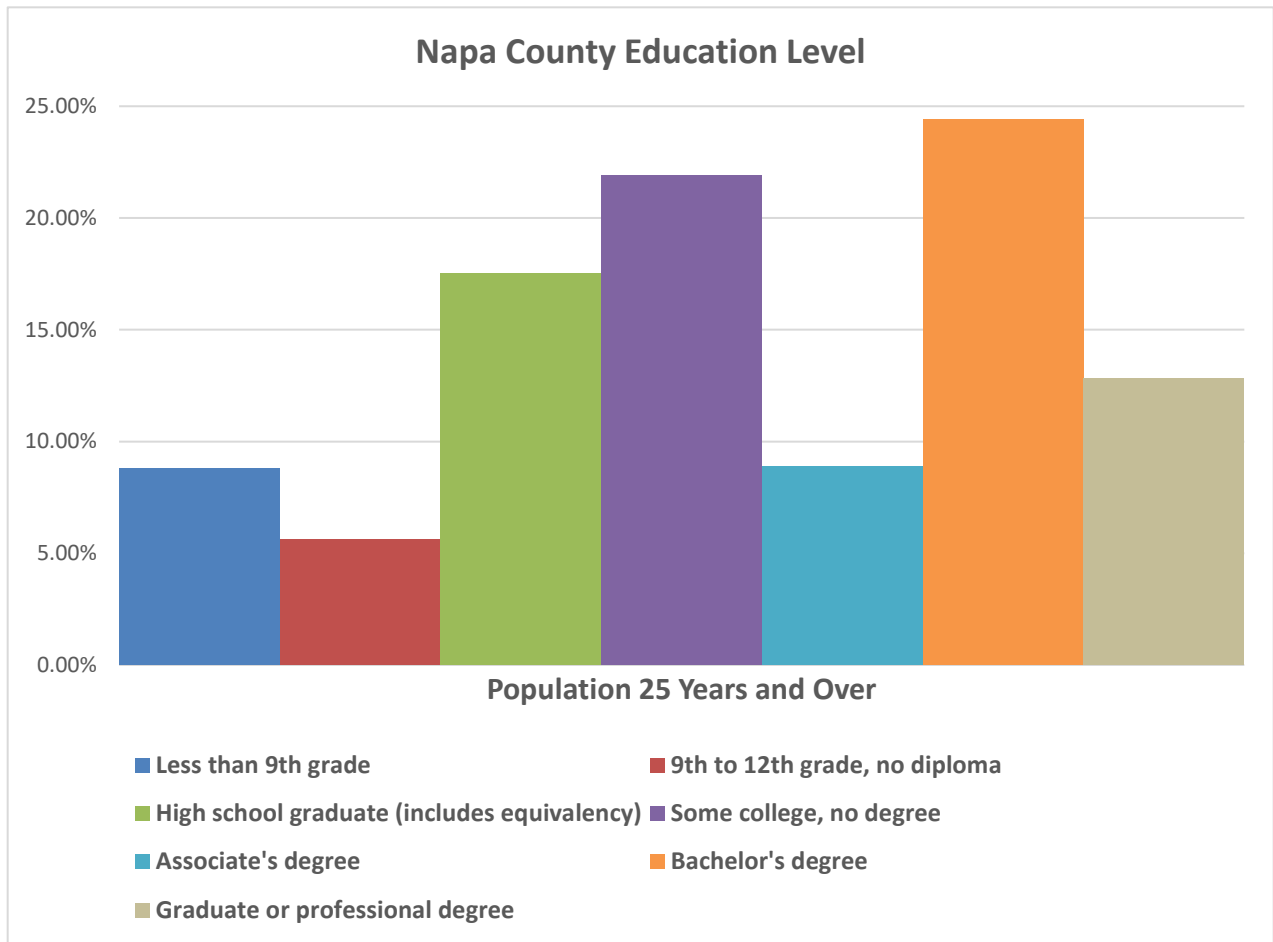
Napa County has a household average (mean) income of \$129,566, which is \$17,944 higher than the state household average of \$111,622. Also, the rate of poverty, i.e. the percentage of total families with an income below thresholds that vary by family size and composition, is 7.5%. This figure is below the California average of 12.6% of all families.

## **E. TRADITIONALLY UNDERSERVED COMMUNITIES**

To determine which communities qualify for consideration as low-income and minority populations, NVTa analyzed U.S. Census Data and established partnerships with local community-based organizations and city and county agencies that serve these populations. NVTa 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 2016-2020 ACS data.



**Figure 1: Napa County Education Level**



Source: 2016 – 2020 ACS Data: Table S1501

### **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 2022 Plan for Language Assistance.

Several current studies<sup>3</sup> 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. The 65 and older population is the most rapidly growing population in Napa County, with the latest statistics indicating that 28% of Napa County residents are age 60 and above.

#### **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 in multiple languages; and making translation services more widely available at public venues and community events.

<sup>3</sup> "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](http://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](http://www.migrationpolicy.org/pubs/napa-profile)



## **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 COVID-19 pandemic and the subsequent shelter-in-place orders required NVTA to reassess its methods to engage the public. Following the strategies of other public agencies and workplaces, a majority of public participation opportunities shifted to an online platform. Despite having a virtual platform space to host online engagement, the amount of outreach during Fiscal Years 2019-2020 through 2021-2022 decreased in comparison to the previous three years. During the pandemic, many projects and plans were either postponed or eliminated, thus decreasing the amount of outreach required.

As the pandemic and its restrictions unwind, NVTA expects there will be future opportunities for more in-person, online and hybrid outreach. With this in mind, the following factors will 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.)
- Level of potential impacts, including social, economic and environmental impacts

### **C. EXISTING NVTA OUTREACH HISTORY OF PUBLIC OUTREACH AND INVOLVEMENT ACTIVITIES**

NVTA has and will continue to use a broad array of communication tools and resources 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 2022 NVTA Plan for LEP Populations
- Translation of NVTA key website pages, documents and reports
  - Google Translate was offered for translations on both NVTA's website and the Vine Transit website
- Making translators available at public meetings and events (both in-person and virtual)
  - NVTA strives to bring 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 pre-pandemic
- Distribution of translated or bilingual collateral materials to local CBOs and community agencies
- Use of social media tools and resources
  - NVTA has active Facebook, Instagram, NextDoor and Twitter accounts



- Participation in local community events (both in-person and virtual)
- Hosting of public meetings at appropriate community venues

NVTA kept a summary of these outreach activities during the last planning period from 2020 through and 2022 and will continue to do so.

#### **D. 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 2022 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 (both in-person and virtual)

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:
    - 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 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
    - Women's 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
    - Healthy Aging Populations Initiative (HAPI)
    - Rianda House, St. Helena, CA
- Tracking the number and percentage of comments or feedback received in languages other than English. NVTA tracks all inquiries, comments, and complaints. NVTA offers physical comment cards in English and Spanish and an online comment form (via the HappyFox software) that can be submitted in any language.
  - 337 total online comment submissions via HappyFox in FY 2019-2020. Of those, six were written in and responded to in Spanish
  - 161 submissions in FY 2020-2021. Of those, two were written and responded to in Spanish
  - 194 submissions in FY 2021-2022. Of those, five were written and responded to in Spanish
- Tracking the number and type of Title VI public complaints that the NVTA staff receive via phone, email, HappyFox 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 NVRTA 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. NVRTA will be able to better serve its customers and its customers will realize greater benefits from the use of NVRTA's services.



## APPENDIX 3



### 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 NVRTA 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 complaint.

Signature

Date



## APPENDIX 4



### 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 2022 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 & standards:

- 1) 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.
- 2) Paratransit:** Never exceed 1.0
- 3) 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. However, since the onset of the COVID-19 pandemic, vehicle load factors have remained low.

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 N, S, W, E and on-demand bus stop-to-stop service provide local transit service to the residents of the City of Napa. Route S and E operate as a one way loop creating a coverage based system ensuring that most riders and residents are within walking distance of fixed route transit. Route W operates bi-directionally in a loop creating faster travel options for riders. Route N operates as an out-and-back route covering high-demand origins and destinations on the North side of the City. The City of Napa on-demand service operates within a defined service area allowing riders to make a trip between any two existing bus stops, as long as the origin and destination bus stops are not already part of a fixed route. On weekdays Routes N operates on half hourly headways on both weekdays and Saturdays. Routes S and W run every forty-five minutes on both weekdays and Saturdays. The on-demand service doesn't operate on headways. Routes N, S, W and E do not operate on Sundays.

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.

Routes 29 and 21 are commuter routes that operate exclusively on weekdays. Route 29 operates from the City of Napa, through American Canyon, to the El Cerrito Del Norte BART Station. Route 21 operates from the City of Napa downtown Transit Center to the Napa Valley College, Fairfield Transit Center and the Suisun Train Depot, connecting passengers to the Amtrak Capitol Corridor. Route 29 operates throughout the morning, takes a mid-day break, then resumes service in the early afternoon through early evening. Route 21 operates nearly hourly.

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 more than 1 minute 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 quarterly 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 and ridership. 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**



## **Chapter 3: Goals, Objectives, & Standards**

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### **Process for Establishing, Reviewing, and Updating Goals, Objectives, and Standards**

NVRTA reviews its goals, objectives, and standards every four years 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. NVTA reviews performance on a quarterly and annual basis as defined by its Performance Monitoring and Corrective Action plan. This review allows planning staff address routes with poor performance and make a plan to correct inefficiencies.

### **Napa Valley Transportation Authority Goals**

NVRTA 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.

## Napa Valley Transportation Authority Objectives

The sixteen objectives below were developed to support the achievement of the goals stated in the previous section. NVRTA has elected to present them as a group, rather than listing specific objectives under each goal recognizing that each objective can correlate to multiple goals. NVRTA’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.

## Napa Valley Transportation Authority Measures and Performance Standards

The following tables will outline what goals NVRTA’s measures and performance standards fall under and their related objective or objectives. The performance standards consist of both qualitative and quantitative definitions of acceptable performance. Performance as it relates to the KPIs outlined in Section 2 will be monitored as defined by NVRTA’s Performance Monitoring and Corrective Action Plan (Appendix B).

### 1.1.1 Goal 1 – Provide High Quality Transit Services

In order to meet the mobility needs of the residents of Napa County, NVRTA strives to implement the highest quality transit services possible. The measures and performance standards ensure that NVRTA 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  |
|-------------------------------------|--|--|
| Total Ridership                     | <b>Fixed Route:</b> Should be within 2% of regional trends<br><b>Paratransit:</b> Growth should not lead to denials<br><b>Community Shuttles:</b> Growth should not lead to excessive wait times   | 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16 |
| Passengers per Revenue Vehicle Hour | <b>Local Service:</b> Greater than 8 on weekdays and 7 on weekends<br><b>Express:</b> Greater than 5<br><b>Regional:</b> Greater than 12 on weekdays and 10 on weekends<br><b>Paratransit:</b> Greater than 2.0 on weekdays and 1.5 on weekends<br><b>On Demand:</b> Greater than 4.0 on weekdays and 3 on weekends  | 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16 |
| Load factor                         | <b>Fixed Route:</b> 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.<br><b>Paratransit:</b> Never exceed 1.0<br><b>Community Shuttles:</b> 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, 9, 10, 11, 12, 13, 14, 15, 16 |
| Percent Missed Trips per Trip Miles | <b>Fixed Route:</b> Less than .01%<br><b>Paratransit:</b> 0%<br><b>Community Shuttles:</b> Less than .01%  | 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16 |
| Scheduled On-Time Arrivals          | <b>Fixed Route:</b> Equal or greater than 90% on-time<br><b>Paratransit:</b> Equal or greater than 97% on-time<br><b>Community Shuttles:</b> 90% of service will arrive within 15 minutes of request for service.  | 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16 |
| Passenger Injuries                  | <b>All Modes:</b> Less than 1 per 100,000 passenger trips  | 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16 |



| Measure                            | Standard   | Objectives |
|------------------------------------|--|------------|
| Preventable Accidents              | <b>All Modes:</b> Less than 1 per 100,000 revenue miles  |            |
| Complaints                         | <b>Fixed Route:</b> Less than 1 per 100,000 revenue miles<br><b>Paratransit:</b> No more than 1 complaint for every 600 passenger trips.<br><b>Community Shuttles:</b> Less than 1 per 5,000 revenue miles   | 2, 3, 4    |
| Percent of Trips Denied            | <b>Paratransit:</b> 0%   | 2          |
| Cleanliness of Buses               | Interiors and exteriors cleaned daily  |            |
| Proximity to Service               | <b>Fixed Route:</b> 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.<br><b>Paratransit:</b> 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. |            |
| Frequency of Service               | <b>Fixed Route:</b> 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.   |            |
| 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.   |            |
| Bus Stop Amenities                 | Stops which average 50 or more riders a day should have a shelter installed if feasible.   |            |
| Trip length                        | <b>Paratransit:</b> Trips should not exceed 1.25 times that of an equivalent trip on fixed route transit.  |            |

### 1.1.2 Goal 2 – Operate Safe, Reliable, and Comfortable Service

Safe, reliable, and comfortable service are NVTa’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   | Objectives |
|---|--|------------|
| Average Age of Fleet by Vehicle Type            | <b>Fixed Route:</b> Average age should not exceed 12 years.<br><b>Paratransit:</b> Average age should not exceed 4 years.<br><b>Community Shuttles:</b> Average age should not exceed 4 years.   | 1, 2, 3, 4 |
| Average Mileage of Fleet by Vehicle Type        | <b>Fixed Route:</b> Average should not exceed 500,000 miles.<br><b>Paratransit:</b> Average should not exceed 100,000 miles.<br><b>Community Shuttles:</b> Average should not exceed 100,000 miles.  | 1, 2, 3, 4 |
| Scheduled On-Time Arrivals                      | <b>Fixed Route:</b> Equal or greater than 90% on-time<br><b>Paratransit:</b> Equal or greater than 97% on-time<br><b>Community Shuttles:</b> 90% of service will arrive within 30 minutes of request for service.  |            |
| Passenger Injuries                              | <b>All Modes:</b> Less than 1 per 100,000 passenger trips  |            |
| Preventable Accidents                           | <b>All Modes:</b> Less than 1 per 100,000 revenue miles  |            |
| Complaints                                      | <b>Fixed Route:</b> Less than 1 per 100,000 revenue miles<br><b>Paratransit:</b> No more than 1 complaint for every 600 passenger trips.<br><b>Community Shuttles:</b> Less than 1 per 5,000 revenue miles   | 2, 3, 4    |
| Percent of Trips Denied                         | <b>Paratransit:</b> 0%   | 2          |
| Cleanliness of Buses                            | <b>All Modes:</b> Interiors and exteriors cleaned daily  |            |
| Percent Missed Trips per Trip Miles             | <b>Fixed Route:</b> Less than .01%<br><b>Paratransit:</b> 0%<br><b>Community Shuttles:</b> Less than .01%  | 2, 3, 4    |
| Preventative Maintenance Work Completed On-Time | Greater than 99%   | 1, 2, 3, 4 |
| Vehicle Service Miles Between Road Calls        | Greater than 25,000 miles  | 1, 2, 3, 4 |
| Load factor                                     | <b>Fixed Route:</b> 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.<br><b>Paratransit:</b> Never exceed 1.0<br><b>Community Shuttles:</b> Less than 1.5 in peak for local service, less than or equal to 1.0 in off peak. | 2, 3, 4    |
| Frequency of Service                            | <b>Fixed Route:</b> 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, 3, 4 |

| Measure                            | Standard  | Objective |
|------------------------------------|---|-----------|
| 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      |
| Bus Stop Amenities                 | Stops which average 50 or more riders a day should have a shelter installed if feasible.                                |           |
| Trip length                        | <b>Paratransit:</b> Trips should not exceed 1.25 times that of an equivalent trip on fixed route transit.               |           |

### 1.1.3 Goal 3 – Efficiently Use NVRTA Resources

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

Table 3-3: Goal 3 Performance Measures & Standards

| Measure                             | Standard  | Objective     |
|-------------------------------------|---|---------------|
| Total Ridership                     | <b>Fixed Route:</b> Within 2% of regional trends<br><b>Paratransit:</b> Growth should not lead to denials<br><b>Community Shuttles:</b> Growth should not lead to excessive wait times  | 2, 3, 4, 5, 6 |
| Passengers per Revenue Vehicle Hour | <b>Local Service:</b> Greater than 8 on weekdays and 7 on weekends<br><b>Express:</b> Greater than 5<br><b>Regional:</b> Greater than 12 on weekdays and 10 on weekends<br><b>Paratransit:</b> Greater than 2.0 on weekdays and 1.5 on weekends<br><b>On Demand:</b> Greater than 4.0 on weekdays and 3 on weekends   | 2, 3, 4, 5, 6 |
| Subsidy per Passenger               | <b>Local Service:</b> Less than or equal to \$6.50<br><b>Express:</b> Less than or equal to \$12.00<br><b>Regional:</b> Less than or equal to \$6.00<br><b>On Demand:</b> Less than or equal to \$15.00   | 5             |
|                                     | <b>Paratransit:</b> At or less than \$40<br><b>Community Shuttles:</b> At or less than \$17   |               |
| Farebox Recovery Ratio              | <b>Fixed Route:</b> Meet or exceed 15%.<br><b>Paratransit:</b> Meet or exceed 10%.<br><b>Community Shuttles:</b> Meet or exceed 10%.  | 1, 6, 7       |
| Load factor                         | <b>Fixed Route:</b> 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.<br><b>Paratransit:</b> Never exceed 1.0<br><b>Community Shuttles:</b> Less than 1.5 in peak for local service, less than or equal to 1.0 in off peak.  | 2, 3, 4, 5    |
| Percent Missed Trips per Trip Miles | <b>Fixed Route:</b> Less than .01%<br><b>Paratransit:</b> 0%<br><b>Community Shuttles:</b> Less than .01%   | 2, 3, 4, 5    |
| Scheduled On-Time Arrivals          | <b>Fixed Route:</b> Equal or greater than 90% on-time<br><b>Paratransit:</b> Equal or greater than 97% on-time<br><b>Community Shuttles:</b> 90% of service will arrive within 15 minutes of request for service.   | 2             |
| Complaints                          | <b>Fixed Route:</b> Less than 1 per 100,000 revenue miles<br><b>Paratransit:</b> No more than 1 complaint for every 600 passenger trips.<br><b>Community Shuttles:</b> Less than 1 per 5,000 revenue miles  | 2, 3, 4, 5, 6 |
| Percent of Trips Denied             | <b>Paratransit:</b> 0%  | 2, 3          |
| 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          |
| Proximity to Service                | <b>Fixed Route:</b> 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.<br><b>Paratransit:</b><br>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       |
| Frequency of Service                | <b>Fixed Route:</b> 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       |

### 1.1.4 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   | Objecti  |
|---|--|----------|
| 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     |
| Proximity to Service  | <b>Fixed Route:</b> 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.<br><b>Paratransit:</b> 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  |
| Frequency of Service  | <b>Fixed Route:</b> 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  |
| 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,    |
| Bus Stop Amenities  | Stops which average 50 or more riders a day should have a shelter installed if feasible.   | 3        |
| Average Age of Fleet by Vehicle Type  | <b>Fixed Route:</b> Average age should not exceed 12 years.<br><b>Paratransit:</b> Average age should not exceed 4 years.<br><b>Community Shuttles:</b> Average age should not exceed 4 years.   | 1, 2, 3  |
| Average Mileage of Fleet by Vehicle Type  | <b>Fixed Route:</b> Average should not exceed 500,000 miles.<br><b>Paratransit:</b> Average should not exceed 100,000 miles.<br><b>Community Shuttles:</b> Average should not exceed 100,000 miles.  | 1, 2, 3  |
| Total Ridership   | <b>Fixed Route:</b> Be within 2% of regional trends<br><b>Paratransit:</b> Growth should not lead to denials<br><b>Community Shuttles:</b> Growth should not lead to excessive wait times  | 2, 3, 4, |
| Passengers per Revenue Vehicle Hour   | <b>Local Service:</b> Greater than 8 on weekdays and 7 on weekends<br><b>Express:</b> Greater than 5<br><b>Regional:</b> Greater than 12 on weekdays and 10 and weekends<br><b>Paratransit:</b> Greater than 2.0 on weekdays and 1.5 on weekends<br><b>On Demand:</b> Greater than 4.0 on weekdays and 3 on weekends   | 2, 3, 4, |
| Maintain an up-to-date list of stakeholders   | Contact individuals and organizations yearly to ensure information is up-to-date on contact list.  | 1        |
| 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.  |          |
| Land Use Coordination   | Comment on all design referrals with obvious transit nexus. Ensure participation on any TAC for major local land use projects  | 1        |



# 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, 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 'ContactUs' tab on [www.ridethevine.com](http://www.ridethevine.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](http://www.nvta.ca.gov) or [www.vinetransit.com](http://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.ridethevine.com](http://www.ridethevine.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](http://www.nvta.ca.gov) o [www.vinetransit.com](http://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 Patakarang**

Pinagkakalooban ng Central Contra Costa Transit Authority (County Connection) ang lahat ng mamamayan ng pantay-pantay na akses sa mga serbisyo nito ng transportasyon sa Central Contra Costa. Dedikado 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 NVTa sa 707-259-8631 o sa tab na 'Makipag-ugnay sa Amin' sa [www.ridethevine.com](http://www.ridethevine.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](http://www.nvta.ca.gov) o [www.vinetransit.com](http://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.

Napa Valley Transportation Authority has not received any Title VI Investigations or Lawsuits since the submission of its last Title VI Program. The NVRTA did receive two complaints in 2014 as outlined below. No complaints were received in 2015 or 2016. Below is the list used for tracking these incidents:

#### Title VI Investigations, Lawsuits and Complaints

|                       | <b>Date<br/>(Month,<br/>Day, Year)</b> | <b>Summary<br/>(Include basis of<br/>complaint: race, color, or<br/>national origin)</b> | <b>Status</b> | <b>Action Taken</b> |
|-----------------------|--|--|---------------|---------------------|
| <b>Investigations</b> |  |  |               |                     |
| <b>1.</b>             | <b>N/A</b>                             |  |               |                     |
| <b>Lawsuits</b>       |  |  |               |                     |
| <b>1.</b>             | <b>N/A</b>                             |  |               |                     |
| <b>Complaints</b>     |  |  |               |                     |

|  |  |  |  |  |
|--|--|--|--|--|
|  |  |  |  |  |
|  |  |  |  |  |



## APPENDIX 7

### Racial Breakdown of the Membership of Transit-Related Advisory Committees

|  | <b>Paratransit<br/>Coordinating<br/>Council(PCC)</b> | <b>Citizens<br/>Advisory<br/>Committee<br/>(CAC)</b> | <b>Active<br/>Transportation<br/>Advisory<br/>Committee<br/>(ATAC)</b> |
|--|--|--|--|
| <b>Approved Membership<br/>Positions</b>   | <b>9</b>   | <b>19</b>  | <b>11</b>  |
| <b>Filled Membership<br/>Positions</b>   | <b>6</b>   | <b>14</b>  | <b>10</b>  |
| <b>Members Completing<br/>Survey</b>   | <b>3</b>   | <b>9</b>   | <b>3</b>   |
|  |  |  |  |
| <b>American<br/>Indian/Alaskan Native</b>  |  |  |  |
| <b>Black or African<br/>American (Non-<br/>Hispanic Origin)</b>  |  | <b>1</b>   |  |
| <b>White or Caucasian</b>  | <b>2</b>   | <b>7</b>   | <b>3</b>   |
| <b>Hispanic (Mexican,<br/>Puerto Rican,<br/>Cuban, Central or<br/>South African or<br/>other Spanish<br/>Origin)</b> | <b>1</b>   | <b>1</b>   |  |
| <b>Asian/Pacific Islander</b>  |  | <b>1</b>   |  |

### **Outreach Efforts to Encourage Participation**

NVTA values the ethic 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 ethically, 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, NVRTA office, and other facilities.

## **RESOLUTION No. 22-XX**

### **A RESOLUTION OF THE NAPA VALLEY TRANSPORTATION AUTHORITY (NVTA) ADOPTING THE REVISED 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, establishing requirements and guidelines for Title VI compliance; and

**WHEREAS**, the above-referenced Circular details required elements of a Title VI Program Report that each FTA grant recipient must submit to FTA every three (3) years to verify compliance with Title VI;

**WHEREAS**, NVTA's submitted an updated program report to FTA on November 27, 2019; and

**WHEREAS**, NVTA's Title VI Program was awarded Concur status on July 28, 2022 by FTA, pending compliance with additional requirements; and

**WHEREAS**, NVTA has revised the Title VI Program Plan, in response to the Review Assessment to ensure 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 Revised 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:

2. Include evidence of the Board's consideration and approval of the Title VI Program; and
3. Take any other steps necessary to give effect to this Resolution, including responding to any follow-up inquiries from the FTA.
- 4.

**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 16, 2022, by the following vote:

Passed the 16<sup>th</sup> day of November, 2022.

\_\_\_\_\_  
Liz Alessio, NVTa Chair

Ayes

Nays:

Absent:

ATTEST:

\_\_\_\_\_  
Laura Sanderlin, NVTa Board Secretary

APPROVED:

\_\_\_\_\_  
Osman, NVTa Legal Counsel





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## Title VI Notice to Public

### Title VI Notice to Public

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. 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.

The Napa Valley Transportation Authority 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 Napa Valley Transportation Authority. Any such complaint must be in writing and submitted to the Napa Valley Transportation Authority within one hundred eighty (180) days following the date of the alleged discrimination.

There are several ways to file a complaint. Complaints may be filed in writing and mailed to Manager of Human Resources and Administration, Napa Valley Transportation Authority, 625 Burnell St., Napa, CA 94559-3420. A copy of the Title VI Complaint Form is available by calling (707) 259-8631 or [download the form](#) <sup>[1]</sup>. You can also fill out an [online](#) <sup>[2]</sup> Title VI complaint form. We encourage use of the Title VI Complaint Form.

**To fill-out an online complaint form, [click here](#) <sup>[2]</sup>.**

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.

## 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, Director of Civil Rights, 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 early resolution of complaints. The option of informal meeting(s) between the affected parties and the Director of Civil Rights may be utilized for resolutions.

## 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 Director of Civil Rights for their concurrence. If the Director of Civil Rights 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 filed 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.

A 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 NVTA's 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.

#### **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.

You may also download a complaint form from FTA's website. Go to [www.fta.dot.gov/civilrights](http://www.fta.dot.gov/civilrights) [3] for more information.

For more information regarding Title VI or need further language assistance, please contact Vine Transit by E-mail at [Contact Us](#) [4] or call (707) 259-8631.

**To fill-out an online complaint form, [click here](#) [2].**

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- [San Francisco Bay Ferry](#)
- [BART](#)

## Contact

625 Burnell Street  
Napa, CA 94559-3420  
[Click here for Driving Direction](#)

1-800-696-6443

Email: info@nvta.ca.gov

**Source URL:** <https://ridethevine.com/title-vi-notice-public>

**Links:**

- [1] [http://www.ridethevine.com/sites/default/files/Title%20VI%20Complaint%20Form\\_0.pdf](http://www.ridethevine.com/sites/default/files/Title%20VI%20Complaint%20Form_0.pdf)
- [2] <http://www.ridethevine.com/title-vi-complaint-form>
- [3] [http://www.fta.dot.gov/civilrights/title6/civil\\_rights\\_5104](http://www.fta.dot.gov/civilrights/title6/civil_rights_5104)
- [4] <https://ridethevine.com/contact-us>