

TITLE VI PLAN
For the Federal Transit Administration
And Washington State Department of Transportation

December 31, 2016 - December 31, 2019

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VALLEY TRANSIT

TITLE VI PLAN INTRODUCTION

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.

Valley Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B effective October 1, 2012.

Title VI Mission

Valley Transit's Title VI Program's primary goal is to ensure all management, staff, contractors, local agencies, and service beneficiaries are aware of the provisions of Title VI and the responsibilities associated with Title VI of the Civil Rights Act of 1964.

Valley Transit's Title VI Program is responsible for providing leadership, direction and policy to ensure compliance with Title VI, Environmental Justice, and Limited English Proficiency principles and to ensure that social impacts to communities and people are recognized and considered throughout the transportation planning and decision-making process. Please do not hesitate to call our office for further assistance.

What is Title VI?

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

What does this mean?

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

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

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

Title VI Complaint Procedures

Valley Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of transit services on the basis of race, color or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B. If you believe you have been subjected to discrimination under Title VI, you may file a complaint.

How Do I File a Title VI Complaint?

You may file a signed, written complaint up to one hundred and eighty (180) days from the date of the alleged discrimination. The complaint should include the following information:

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

A form is available at Valley Transit which may be completed for this purpose. (Attachment B)

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

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

Note: Valley Transit encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be easily tracked. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the Title VI coordinator as soon as possible, but no later than 180 days from the alleged date of discrimination.

What Happens to My Complaint After It Is Submitted to Valley Transit?

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by Valley Transit will be directly addressed by Valley Transit. Valley Transit shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, Valley Transit shall make every effort to address all complaints in an expeditious and thorough manner.

In instances where additional information is needed for investigation of the complaint, Valley Transit will contact the complainant in writing. Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

Once sufficient information for investigating the complaint is received by Valley Transit, a written response will be drafted subject to review by the transit's attorney.

If appropriate, Valley Transit's attorney may administratively close the complaint. In this case, Valley Transit will notify the complainant of the action as soon as possible.

How Will I Be Notified of The Outcome of My Complaint?

Valley Transit will send a final written response to the complainant and advise the complainant of his or her right to 1) appeal within 7 calendar days of receipt of the final written decision from Valley Transit, and/or 2) file a complaint externally with the Federal Transit Administration. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

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

RECORD OF TITLE VI INVESTIGATIONS, COMPLAINTS OR LAWSUITS

To date, there have been no Title VI complaints, investigations, or lawsuits.

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

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

Census: The United States is home to millions of national origin minority individuals who are limited English proficient. That is, their primary language is not English and they cannot speak, read, write or understand the English language at a level that permits them to interact effectively with recipients of Federal financial assistance. Because of language differences and the inability to effectively speak or understand English, persons with LEP may be subject to exclusion from programs or activities, experience delays or denials of services. These individuals may be entitled to language assistance with respect to a particular type of service. The federal government and those receiving assistance from the federal government must take reasonable steps to ensure that LEP persons have meaningful access to the programs, services, and information those entities provide. This will require agencies to establish creative solutions to address the needs of this ever-growing population of individuals for whom English is not their primary language. To determine the need to provide language assistance for non-English speaking individuals, information was gathered from ridership surveys, social service agencies and local school districts. According to the 2010 Census Data, English is spoken by 94.98% of the Valley Transit service area

residents. Overwhelmingly, Spanish represents the majority (4.79%) of the non-English speaking in the Valley Transit Service Area.

ANALYSIS OF FACTORS

Factor No. 1: The number or proportion of LEP persons in the service area.

Valley Transit's jurisdiction covers the cities of Walla Walla and College Place and parts of Walla Walla County. The vast majority of the population with which we do business (individuals wishing to ride transit) is proficient in English, so that LEP services are not normally required. According to the 2010 Census Data for Walla Walla County, English is spoken by 94.98% of residents in the transit service area. Overwhelmingly, Spanish speaking in the household represents 4.79% of the non-English speaking within the Valley Transit Service Area.

Factor No. 2: The frequency with which LEP individuals come into contact with the service.

We serve LEP persons daily via our buses, paratransit, demand response services, and vanpool program. Customer Service representatives have received Spanish language training and many of our operators have been certified proficient in conversational Spanish. Valley Transit also provides "Language Line" services and uses Google Translate to communicate. Language assistance and document translation services are available upon request.

Factor No. 3: The nature and importance of service provided by Valley Transit.

Valley Transit provides important public transportation services to the public through its fixed route, paratransit, and rideshare programs.

Factor No. 4. The resources available to the recipient of the federal funds to assure meaningful access to the service by LEP persons.

Valley Transit's current in-house language capabilities are English and Spanish. Our current staff has job-related conversational Spanish language proficiency and will assist as able on those occasions when a person with limited English proficiency contacts the transit system. Additionally, Valley Transit has an outreach program where Spanish-speaking customers are taught how to ride the bus through training and through one-on-one assistance. And finally, Valley Transit has publications in both English and Spanish. We budget \$9,500 per year to print route schedules in English that contain a Spanish section. Special notices of public meetings and accommodations are made available in Spanish. In the last three years (2014-2016), we spent approximately \$1,618 for advertising. We received no requests for Language Line services during this time. We will budget \$1,500 for these services in 2017.

IMPLEMENTATION PLAN

Valley Transit currently has implemented its plan and will review it annually, including contacts with LEP persons to determine frequency, languages used, and how the contacts were handled. We identify LEP persons in the service area by ridership, telephone contact counts, neighborhood demographics, general awareness surveys and board surveys. We employ four Customer Service Representatives. To improve our ability to meet the needs of our LEP customers, Valley Transit provides conversational Spanish training classes for our operators and customer contact staff.

Valley Transit also pays an additional \$0.50 (50 cents) per hour premium for employees who are proficient in conversational Spanish. Bus schedules provide rider information in English and Spanish. Valley Transit's Title VI policy and a Complaint Form are available on our website. Beginning in 2010, all printed maps and schedules have Title VI language. Valley Transit is working to improve travel training services for Spanish-speaking individuals. If there is a service change, notices are published in the local English and Spanish-language newspapers. Flyers are also placed on the buses as needed to call attention to route, schedule, or fare changes. In order to comply with 49 CFR 21.9(d), Valley Transit must provide information to beneficiaries regarding their Title VI obligations and inform beneficiaries and sub-recipients of the protections against discrimination afforded them by Title VI. Valley Transit has established a statement of rights and a policy statement.

NOTIFYING BENEFICIARIES OF THEIR RIGHTS UNDER TITLE VI

1. Our website includes our Title VI policy and complaint form. The website also states:

VALLEY TRANSIT does not discriminate on the basis of race, color, disability, religion, or national origin.

VALLEY TRANSIT no discrimina en base de raza, color o, discapacidad, religion, u origen nacional.

2. Our Title VI policy and complaint form are also posted at our Main Office (located at 1401 W. Rose Street, Walla Walla, WA) as well as our downtown Transfer Center (located at 108 W. Main Street, Walla Walla, WA). Individuals who believe they have been discriminated against may request a complaint form from our Customer Services representatives at the Main Office.
3. If information is needed in another language, please contact the Title VI Coordinator at 509-525-9140.

ANALYSIS OF CONSTRUCTION PROJECTS

Over the last three years Valley Transit has not completed a construction project requiring an environmental assessment (EA) or environmental impact statement (EIS).

INCLUSIVE PUBLIC PARTICIPATION

Community Outreach is a requirement of Title VI. Recipients and subrecipients are required to seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach. Recipients have wide latitude to determine what specific measures are most appropriate and should make this determination based on the composition of the affected population, the public involvement process, and the resources of Valley Transit. Valley Transit has engaged the public in its planning and decision-making processes, and the public was invited to participate through marketing and outreach activities as well.

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

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

Board Meetings: The Board of Directors holds monthly meetings and the public is invited to attend. The agenda in Spanish is sent monthly to La Voz, the Spanish newspaper.

Public Meetings: When new service is proposed or significant route changes are made, information is disseminated to the neighborhoods affected and public meetings are scheduled. Rider alerts are placed on buses, shelters and route signs.

Major Service Change: The public was included in public meetings regarding potential service changes to invite their comment. A notice was posted requesting that attendees needing language assistance call the main office to request assistance in another language. Rider alerts were placed on buses, shelters and route signs.

Fare Increase: The public was invited to participate and comment on potential fare changes at public meetings that were held to solicit their input.

Travel Training Class: Valley Transit has developed a travel training program to reach out to community groups (senior centers, senior facilities, and the disabled community) to conduct travel training classes. Travel Training classes are ongoing as well as outreach to these populations.

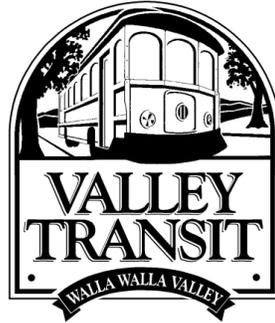
Customer Comment Process: Citizens may call our Main Office at (509)525-9140 to lodge a complaint, compliment, or comment. All complaints, compliments, and comments are put into a database and distributed to the relevant manager who researches the complaint and responds back to the citizen. Valley Transit's complaint process was updated in 2009.

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

All information is tracked until the complaint, investigation, or legal action has been closed. The records are then stored according to state and federal record retention requirements. Tracked information will be reported to the Federal Transit Administration and/or WSDOT as the grantors of the public funds.

General Awareness and Phone Surveys: Valley Transit occasionally conducts onboard rider and general awareness surveys. Origin/Destination surveys and other public surveys are developed to assist Valley Transit in gathering information about service alternatives and possible route changes. Valley transit is currently working with WSDOT to develop and conduct a survey of public transportation resources in the region. This survey will document how the public transportation system is being used and identify gaps if they exist.

Bilingual Outreach: Valley Transit's Customer Service representatives provide Spanish-speaking guests with information on public transit services in Spanish. Interpreter services are utilized in outreach programs and offered for programs and public meetings.



VALLEY TRANSIT TITLE VI NON-DISCRIMINATION POLICY STATEMENT

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

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

Title VI Coordinator
1401 W. Rose Street
Walla Walla, WA 99362

Email address: ann@valleytransit.com
By Phone: 509-525-9140
By Fax: 509-525-9142

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

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

Richard Fondahn
General Manager

Richard Fondahn, General Manager
Phone 509-525-9140 -- Fax 509-525-9142
1401 W. Rose Street
Walla Walla, WA 99362
www.valleytransit.com

Attachment B

VALLEY TRANSIT TITLE VI COMPLAINT FORM

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

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

PLEASE PRINT CLEARLY:

Name: _____

Address: _____

City, State, Zip Code: _____

Phone Number: _____ Home _____ Cell _____ (Message)

Person discriminated against: _____

Address of person discriminated against: _____

City, State, Zip Code: _____

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

_____ Race or color

_____ National origin

_____ Income

_____ Other

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

Where did the alleged discrimination take place? _____

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

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

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

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

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

Your Signature

Print your name

Date

VALLEY TRANSIT PUBLIC NOTIFICATION POLICY FOR FARE/SERVICE CHANGES

Policy Statement and Purpose

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

It is the intent of Valley Transit to comply with the Federal Public Comment on Fare and Services Changes rules (FTA Circular 9030.1E, Chapter V, 5 (0)), and public participation requirements under Title VI, DBE, and ADA regulations.

Changes requiring a public process:

Changes will include changes defined in the Valley Transit Title VI policies including but not limited to:

- A major service change is defined as any change in service on any individual route that would add or eliminate more than twenty percent of the route revenue miles or twenty percent of the route revenue hours. All major service changes will be subject to an equity analysis which includes an analysis of adverse effects.
- A service change leading to an adverse effect is defined as a significant geographical or time-based reduction in service which includes but is not limited to: span of service changes, frequency changes, route segment elimination, re-routing, or route elimination.
- A service change that could lead to a disproportionate burden occurring when the low-income population adversely affected by a fare or service change is five percent more than the average low-income population of Valley Transit's service area
- A disparate impact occurs when the minority population adversely affected by a fare or service change is ten percent more than the average minority population of Valley Transit's service area.

Any fare increase:

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

Procedures

In order to ensure the maximum opportunity for public input and involvement in the decision process regarding major service changes and fare increases, Valley Transit adheres to the following procedures:

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

Public Comment Procedures:

Valley Transit is committed to providing reliable and safe transportation options for the community. Customer service is a primary core value of our organization. The customers of Valley Transit are a fundamental aspect of our business and as such, their feedback is crucial to the growth and development of the agency.

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

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

1. Customer Comment Cards are available on Valley Transit vehicles and at the transfer center
2. US Mail
3. Telephone: Riders can contact the Valley Transit Customer Service Department by phone 509-525-9140
4. E-mail: Riders can contact Valley Transit by e-mail info@valleytransit.com
5. Fax: 509-525-9142
6. In-person at the Valley Transit Main Office Walla Walla or by attendance at a Valley Transit board meeting at 1401 W. Rose Street
7. Language Line: For riders who speak a language other than English, Valley Transit will utilize the services of The Language Line to facilitate the call.

Feedback Review Process:

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

Feedback Acknowledgement:

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

Information about Policy:

Information about the Customer Comment Policy, including how to submit a complaint, will be made available to riders.

Reporting:

Staff will compile a summary of customer comments for the board and employees for use in reviewing and evaluating service.

Tracking:

Valley Transit will maintain a tracking system for all feedback from customers.

Protection from Retribution:

Valley Transit shall ensure that the quality of service delivered to persons submitting comments to the agency will not, in any way be negatively impacted by that submission.

VALLEY TRANSIT PUBLIC PARTICIPATION PLAN

Purpose

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

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

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

Goals and Objectives for the Public Participation Plan

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

In support of this goal, our objectives are:

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

Identification of Stakeholders

Stakeholders are those who are either directly, or indirectly, affected by a plan, or the recommendations of that plan. Those who may be adversely affected, or who may be denied

the benefit of a plan’s recommendation(s) are of particular interest in the identification of specific stakeholders. Stakeholders are broken down into several groups: general citizens, minority and low income persons, public agencies, and private organizations and businesses.

General Citizens: According to the 2010 census, there are 48,677 citizens in the Valley Transit Public Transportation Benefit Area. Of that total, 5.02% of individuals over the age of 5 speak a language other than English at home, and of those, 4.79% are Spanish speaking individuals.

Some of the techniques that can be used to engage the general population are public notices of meetings in local newspapers, open house format public information meetings in locations such as the public library. Staff will also continue to utilize on-board surveys, focus groups, use of local media and the internet to encourage participation from the public.

Minorities: Minority populations make up 36.3% percent of the population in Valley Transit’s service area. Hispanics make up the largest minority, with an average of 20.03% of the population in our service area. Black and Asians make up 2.11 % and 1.48% respectively. American Indians account for 1.04% of the population and Pacific Islanders represent less than .31%. Minority populations listed under the Other category represent 8.06% of the service area population.

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

Valley Transit Service Area

<i>Category</i>	<i>Number</i>	<i>Percent Population</i>
Total	48,677	100
White	31,005	63.7
Black	1,025	2.11
American Indian/Alaskan	506	1.04
Asian	719	1.48
Hawaiian/Pacific Islander	151	.31
Other	3924	8.06
Two or More	1597	3.28
Hispanic	9,750	20.03

Low-Income: The 2010 census listed the per capita income in 2009 for Walla Walla County as \$23,698. The median household income was \$47,166. The percentage of persons living below the poverty level was 17.8%.

While low-income individuals may have access to all of the traditional means of public involvement discussed earlier in the discussion of “general citizens” they may be less likely to become involved or offer input. Some methods of gathering input either directly or indirectly

from this portion of the population include on-board surveys and involvement of agencies such as the local employment offices, housing groups and public assistance providers that work with low-income individuals and families.

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

Private Organizations and Businesses: Private organizations and business offer a number of perspectives that are valuable to our planning processes. We have extensive contact with service providers who work closely with the developmentally disabled and elderly populations who often times cross over into those in the low-income, minority and limited English proficiency demographic.

Outreach Efforts

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

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

During any planning process the public is invited to contact Valley Transit with comments and/or to request additional information. Requests can be made via telephone by contacting Valley Transit Customer Services at 509-525-9140 or by contacting our website at www.valleytransit.com Comments will be collected, documented and presented to the Valley Transit Board of Directors.

Valley Transit Public Participation Contact List

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

Aging & Long Term Care
Blue Mountain Action Council
Children and Family Services of Walla Walla
City of College Place
City of Walla Walla
City of Walla Walla Housing Authority
College Place School District
Downtown Walla Walla Foundation
Family Medical Clinic of Walla Walla
HelpLine (Services for those in need)
Lillie Rice Center (Job Training for Developmentally Disabled Adults)
Local City & County Clerk Offices: Walla Walla County, Walla Walla City, College Place City
of Vocational Rehabilitation
Port of Walla Walla County (Economic Development)
Providence St. Mary Medical Center
SonBridge
United Blind of Walla Walla
United Way of Walla Walla
Veterans Medical Center
Walla Walla Branch-Department of Social and Health Services

- *Division of Children and Family Services*
- *Division of Developmental Disabilities*
- *Division of Vocational Rehabilitation*
- *Home and Community Services Division*
- *Welfare/Community Services Office*

Walla Walla Chamber of Commerce
Walla Walla Community College
Walla Walla County
Walla Walla County Sheriff Department
Walla Walla General Hospital
Walla Walla Police Department
Walla Walla Public Schools
Walla Walla Public Schools Homeless Family Advocate Program
Walla Walla University
Walla Walla Valley MPO & RTPPO offices
Whitman College
WorkSource (Employment Development)
YMCA
YWCA

Attachment E

**VALLEY TRANSIT PUBLIC OUTREACH EFFORTS
CONDUCTED 2014-2016**

Event: Advertisement for public comment
Purpose: Valley Transit Disadvantaged Business Enterprise Goal
Date of Public Notice: 01-10-2014 Walla Walla Union Bulletin
01-16-14 La Voz

Date of Event: February 11, 2014, 7:00pm
February 12, 2014 10:00am
Event: Public Hearing
Purpose: Public Comment on Valley Transit Amended Title VI Plan
Date of Publication: 12-22-13 Walla Walla Union Bulletin
01-09 & 16-14 La Voz

Date of Event: March 20, 2014
Event: Public Hearing
Purpose: Review and Solicit Comments on an amendment to the
2014-2019 Transportation Improvement Plan
Date of Publication: 03-06-14 La Voz and Walla Walla Union Bulletin

Date of Event: June 19, 2014
Event: Public Hearing
Purpose: Review and Solicit Comments on Valley Transit Improvement
Plan 2015-2020
Date of Publication: April 27, 2014 Walla Walla Union Bulletin
May 1, 2014 La Voz

Date of Event: July 17, 2014
Event: Public Hearing
Purpose: Solicit comments on an amendment to the 2014-2019 Transit
Improvement Plan
Date of Publication: 07-13-14 Walla Walla Union Bulletin
07-17-14 La Voz

Date of Event: August 21, 2014
Event: Public Hearing
Purpose: Solicit comments on Transit Development Plan 2014-2020, projected capital improvement projects, and Valley Transit's 2013 Annual Report
Date of Publication: 07-13-14 Walla Walla Union Bulletin
07-17-14 La Voz

Date of Event: October 17, 2014
Event: Special Meeting
Purpose: Exist Conference with presentations from the WA State Auditor's Office
Date of Publication: 10-8-14 Walla Walla Union Bulletin
10-9-14 La Voz

Date of Event: January 15, 2015
Event: Public Hearing
Purpose: Public
Date of Publication: 07-13-14 Walla Walla Union Bulletin
07-17-14 La Voz

Date of Event: February 9, 2015
Event: Public Participation Meeting
Purpose: Presentation regarding development of a long-range Metropolitan and Regional Transportation Plan (M/RTP)
Date of Publication: 02-02-15 Walla Walla Union Bulletin

Date of Event: February 19, 2015
Event: Public Hearing
Purpose: Public Comment and review of the composition of the Valley Transit Board of Directors
Date of Publication: 01-28-15 Walla Walla Union Bulletin

Date of Event: April 9, 2015
Event: Announcement regarding Origin and Destination Survey
Purpose: Request for Proposal
Date of Publication: 03-18-15, 03-19-15 and 03-20-15 - Seattle Daily Journal

Date of Event: May 29, 2015
Event: Request for Proposal
Purpose: Seeking a Voice Over Internet Protocol Phone System (VOIP)
Date of Publication: 04-14-15 and 04-16-15 Walla Walla Union Bulletin

Date of Event: June 18, 2015
Event: Public Hearing
Purpose: Solicit Comments on the Transit Improvement Plan for 2016-2021, and the Regional Transportation Plan for the years 2016-2040.
Date of Publication: 06-10-15 Walla Walla Union Bulletin
05-28-15 La Voz

Date of Event: December 4, 2015
Event: Request for Proposal (RFP)
Purpose: RFP packages
Date of Publication: 11-03-15 and 11-05-15 Walla Walla Union Bulletin

Date of Event: December 17, 2015
Event: Public Announcement
Purpose: Meeting Notice Change
Date of Publication: 12-07-15 Walla Walla Union Bulletin

Date of Event:
Event: Advertisement for seeking a licensed, bonded and insured contractor
Purpose: Install concrete shelter pads throughout the community
Date of Publication: 12-20-15 and 12-22-15 Walla Walla Union Bulletin

Date of Event:
Event: Advertisement for seeking bids
Purpose: Seeking bids for Valley Transit Market Station Customer Service Building renovation and expansion and bid due date.
Date of Publication: 01-15-16

Event: Advertisement for accepting proposals
Purpose: Seeking proposals for an architect or engineer to provide conceptual designs for a transit hub and park and ride lot.
Date of Publication: 02-24-16, 02-25-16 and 02-26-16 Walla Walla Union Bulletin

Date of Event: June 16, 2016
Event: Public Hearing
Purpose: Solicit comments on an amendment to the Transit Improvement Plan for 2016-2021.
Date of Publication: 06-05-16 Walla Walla Union Bulletin
06-09-16 La Voz

Date of Event: July 21, 2016
Event: Special Meeting of the Board of Directors
Purpose: Transit planning training for members of the Valley Transit Board of Directors
Date of Publication: 07-13-16 Walla Walla Union Bulletin
07-14-16 Library

Date of Event: August 18, 2016
Event: Public Hearing
Purpose: Solicit comments on the Transportation Improvement Plan for 2017-2022 and the Transit Development Plan for the years 2016-2021

Date of Publication: 08-10-16 Walla Walla Union Bulletin
08-11-16 La Voz

Date of Event: December 13, 2016
Event: Public Hearing
Purpose: Entrance Conference with State Auditor's Office related to the
Financial Statement and Accountability audit of Valley Transit for
Fiscal years 2014-2015

Date of Publication: 12-07-16 Walla Walla Union Bulletin
12-08-16 La Voz

VALLEY TRANSIT TITLE VI NOTIFICATION OF COMPLAINT PROCEDURES

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.

Valley Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B. If you believe you have been subjected to discrimination under Title VI, you may file a complaint.

If information is needed in another language, contact (509) 525-9140

Valley Transit se compromete a garantizar que ninguna persona sea excluida de participar en, o negado los beneficios de sus servicios de transporte sobre la base de raza, color u origen nacional, tal como esta protegida por el Titulo VI de la Administracion Federal de Transito (FTA) Circular 4702 1.A. Si usted cree que ha sido sujeto a discriminacion bajo el Titulo VI puede presentar una queja.

Si se necesita información en otro idioma, el contacto (509) 525-9140

How Do I File a Title VI Complaint?

You may file a signed, written complaint up to one hundred and eighty (180) days from the date of the alleged discrimination. The complaint should include the following information:

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

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

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

Note: Valley Transit encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be easily tracked. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 180 days from the alleged date of discrimination.

What Happens to My Complaint After it is Submitted to Valley Transit?

All Complaints alleging discrimination based on race, color or national origin in a service or benefit provided by Valley Transit will be directly addressed by Valley Transit. Valley Transit shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, Valley Transit shall make every effort to address all complaints in an expeditious and thorough manner.

In instances where additional information is needed for investigation of the complaint, Valley Transit will contact the complainant in writing. Please note that in responding to any requests for additional information, a complainant’s failure to provide the requested information may result in the administrative closure of the complaint.

Once sufficient information for investigating the complaint is received by Valley Transit, a written response will be drafted subject to review by the Transit’s attorney. If appropriate, Valley Transit’s attorney may administratively close the complaint. In this case, Valley Transit will notify the complainant of the action as soon as possible.

How Will I be Notified of the Outcome of My Complaint?

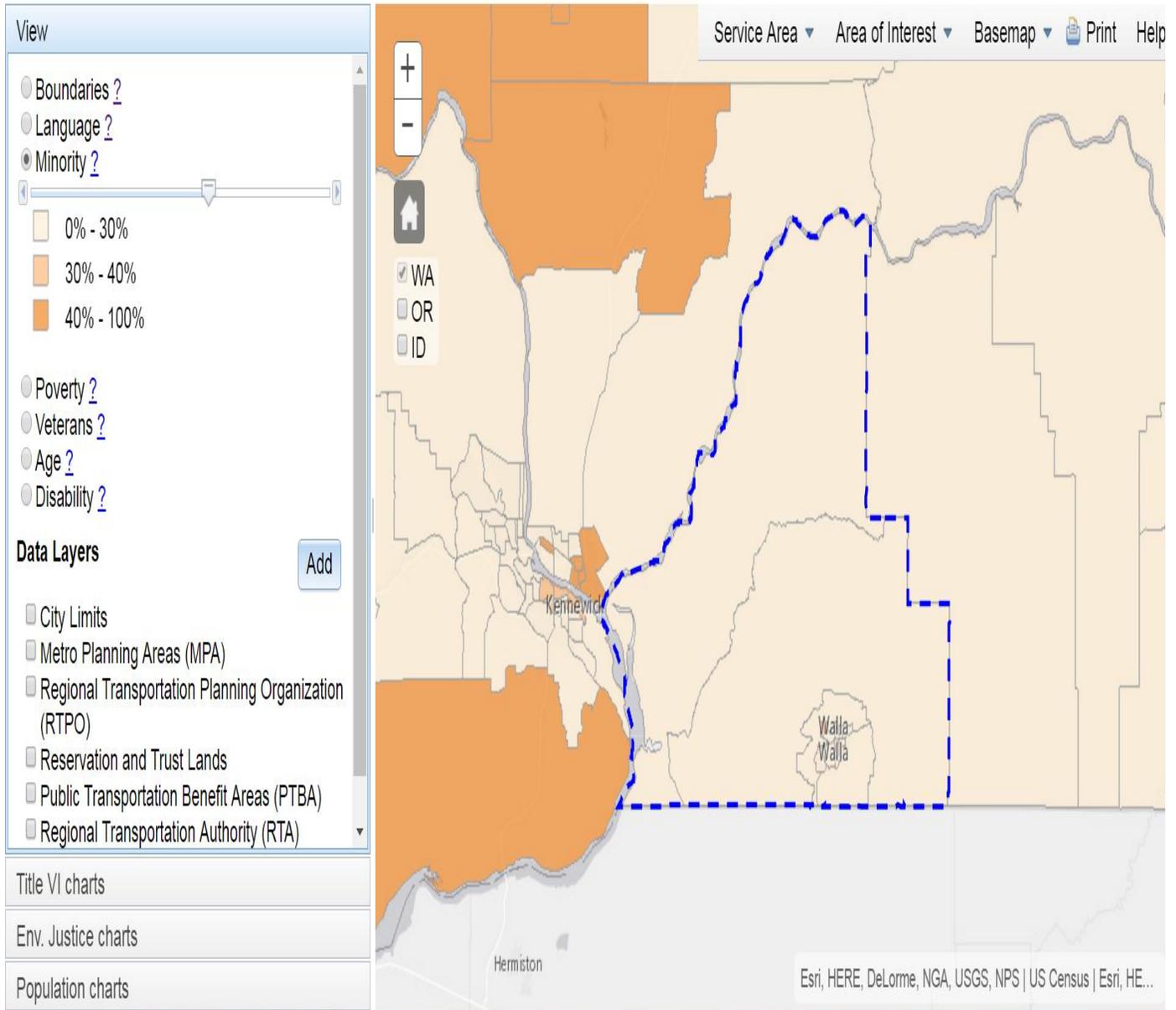
Valley Transit will send a final written response to the complainant and advise the complainant of his or her right to:

- appeal within seven (7) calendar days of receipt of the final written decision from Valley Transit, and/or
- file a complaint externally with the Federal Transit Administration. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

Organization Name and Address	
Valley Transit Attention: Title VI Coordinator 1401 W. Rose Street Walla Walla, WA 99362	Federal Transit Administration Attention: Title VI Program Coordinator East Building, 5 th Floor TCR 1200 New Jersey Avenue SE Washington, DC 20190

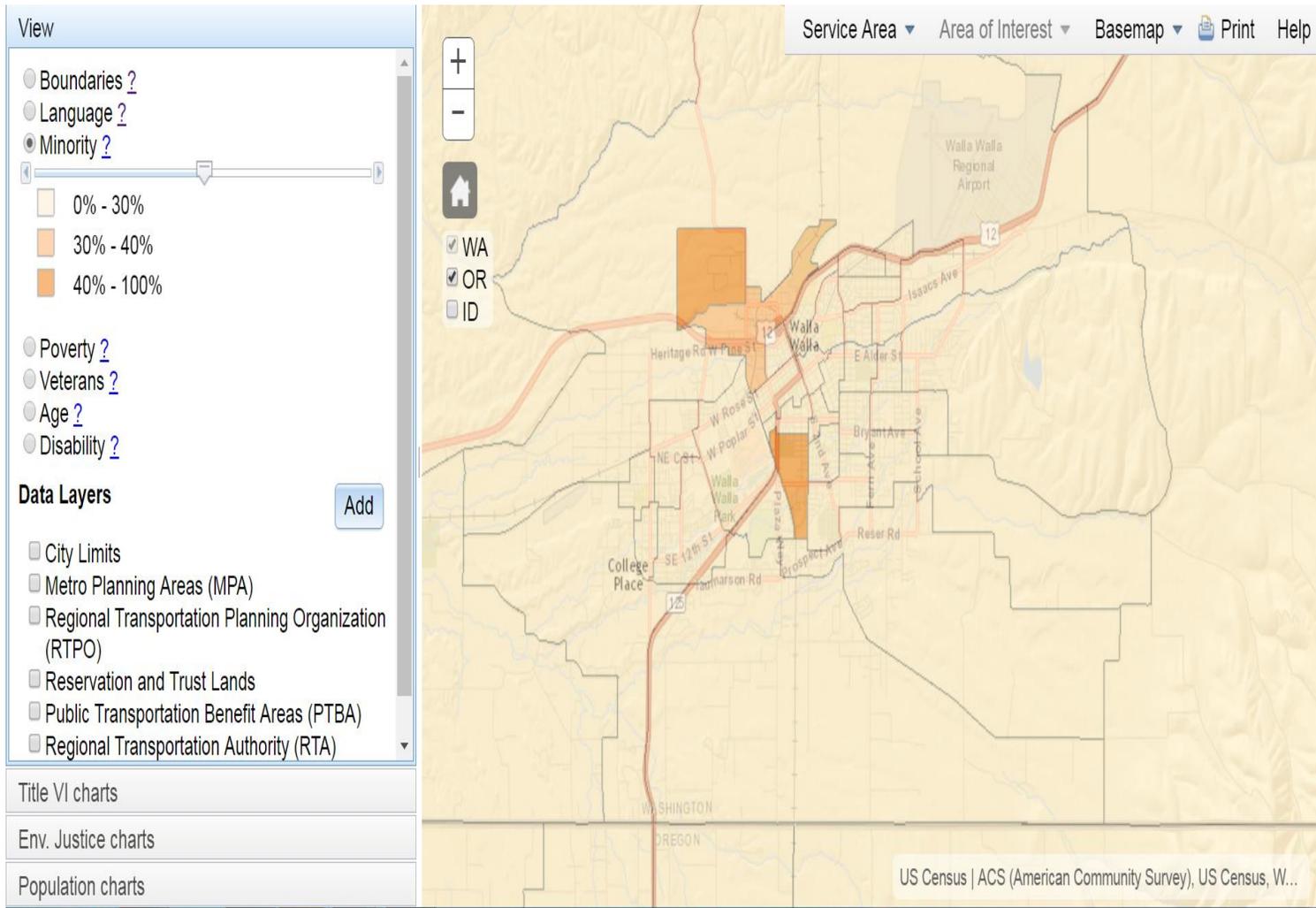
Attachment G

2016 Ethnic Diversity Map Walla Walla County



Attachment H

2016 Ethnic Diversity Map Valley Transit Service Area



VALLEY TRANSIT SERVICE STANDARDS

The following proposal is to create system wide service standards to fulfill the service standard requirement for FTA Title VI. Title VI requires all fixed route transit providers to develop quantitative standards for all fixed route modes of operation for the indicators listed below. The following service standards comply with and have been taken from Title VI Circular FTA C 4702.1B

Objective:

- Create Vehicle Load for each mode and methods to ensure compliance
- Create Vehicle Headway for each mode and methods to ensure compliance
- Create On-Time Performance for each mode and methods to ensure compliance
- Create Service Availability for each mode and methods to ensure compliance
- Create Distribution of Transit Amenities for each mode and methods to ensure compliance
- Create Vehicle Assignment for each mode and methods to ensure compliance

Opportunity

- To better serve our community
- Standards in which to make cohesive decisions on services
- Ensure compliance of Title VI

VEHICLE LOAD FOR FIXED ROUTE

Valley Transit has adopted a Load Factor of 1.35 for all loads during the peak operating period and should not exceed vehicle achievable capacity for a 30-foot bus and a 40-foot bus.

Vehicle Type	Capacity	Seated	Standing	Total	Max Load Factor
30 Ft. Bus	28	28	10	38	1.35
40 Ft. Bus	41	41	14	55	1.35

VEHICLE HEADWAY FOR FIXED ROUTE

Currently Valley Transit headways are adjusted based on ridership demand and market potential, using load factors, productivity, and development growth to inform the planning process. Current Vehicle Headways are 30 to 60 minutes. Saturday and evening routes are 45 minutes to

provide time to cover the entire service area with two route-deviated vehicles and one demand-response vehicle.

ON-TIME PERFORMANCE FOR FIXED ROUTE AND PARATRANSIT

Valley Transit monitors on-time performance on all fixed routes at all time points. Valley Transit's fixed route vehicles travel through all published time points and complete their established runs no more than 5 minutes late compared to the established published timetables before being considered late. Paratransit vehicles are considered on time if they arrive within the thirty minute "promise window" that customers agreed upon while making their trip reservation.

SERVICE AVAILABILITY FOR FIXED ROUTE AND PARATRANSIT

Valley Transit distributes service so that over 80% of all residents living in the fixed-route service area are within a ¼ mile walk of fixed-route bus service. Paratransit provides service to the same area including an additional ¾ mile from nearest fixed route.

VALLEY TRANSIT SERVICE POLICIES

Vehicle Loading / Vehicle Assignment

Valley Transit will design its services to keep the number of passengers on its vehicles at a comfortable level, always within the limits of safety. In peak periods, this means that some passengers may be expected to stand for part of the trip. In off-peak periods, services will be designed to try to provide a seat to all off-peak customers. Where services operate on a highway, services will be planned for all riders to be seated. Route segments that have a history of inappropriate passenger behavior may be limited to seated only capacity so that onboard video security equipment can effectively record passenger activity or conduct.

Consideration is given to matching the capacity of the vehicles to the ridership levels on the route to avoid unnecessary increases in service levels. All vehicles are wheelchair lift or ramp equipped.

In the urban and residential areas, vehicles are typically 30 feet in length. These vehicles are assigned to the fixed routes because their size allows them to travel more easily within the urban environment. These buses are equipped with both front and rear doors for ease of access and exit. Vehicles are assigned based on passenger load, route demand, and run cut.

Passenger standards are calculated on the basis of an average over one hour in the peak period, at the busiest point on the route. For instance, if a service operates at 30-minute intervals, then 2 buses would pass the busiest point in an hour. The average number of passengers for these 2 buses must fall within the service standards, even though any one bus may be more crowded than the average. If the standard is consistently exceeded for the average calculation, Valley Transit may consider larger vehicles for the route(s) in question, or more frequent service to improve the situation.

Passenger Amenities

Bus stops should be placed at most intersections, passenger generators and transfer points subject to minimum spacing criteria. The spacing of stops should not normally be less than 700 feet in developed areas (2 blocks) and 1500 feet in underdeveloped areas (specific major trip generators may require variances in stop spacing). Currently, Valley Transit's stop spacing minimum standard is 700 feet in urban areas. Valley Transit continues to provide flag stops where it is safe to board and deboard passengers outside of the downtown business district.

Where appropriate in urban areas, Valley Transit provides various amenities such as passenger information kiosks, benches and litter receptacles. These guidelines are desired levels of service, but may be modified to reflect the economic viability of the operating budget to enable these expenditures.

Amenity Criteria

Passenger bus shelters:

Established passenger stops generating six (6) or more boardings per hour
Senior residences & institutional facilities
Unique exposure to inclement weather
Terminals and transfer points

Passenger Information kiosks:

At frequently used signed bus stops

Benches:

Bus stops generating four (4) passengers per hour
Bus stops near senior residences and shopping outlets

Litter receptacles:

Placed at shelters and waiting areas that may generate unusually high volumes of litter

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

Development around the major stops should be encouraged to follow transit supportive design principles - closer to the street, favor pedestrian connections, and customer friendly uses in commercial areas such as coffee shops, or passenger amenities.

Bus stops at intersections should be located in the safest position, considering traffic and street conditions. Where possible, stops should be located close to signalized intersections.

Pull outs should be considered for stops located near major trip generators, transfer points, timing points or anywhere else where a bus is likely to have an extended stop time.

Valley Transit is working with local jurisdictions to ensure that the area around transit bus stops should be made accessible to people with disabilities, including wheelchairs and other mobility aids. The long-term objective of Valley Transit is to accommodate accessible features at all of its stops.

Locating Bus Stations/Terminals

Bus terminals and minor turnaround facilities will be located at transit nodes identified as being at the beginning or end of a route and convergence of two or more routes, where local services such as shuttles also connect.

Development around the stations and terminals should incorporate into transit-oriented development uses and design principles.

MINORITY REPRESENTATION ON COMMITTEES

Valley Transit does not currently have non-elected citizen committees.