

# VICTOR VALLEY TRANSIT



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## **TITLE VI PROGRAM**

### **FY 2025 - 2027**

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**Title VI Coordinator: Rod Goldman**  
**Phone: (760) 995-3586**  
**Recipient #: 5538**

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## TITLE VI PROGRAM

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### INTRODUCTION

This document was prepared by VVTA Civil Rights Department and approved by the VVTA Board of Directors to comply with Title VI of the Civil Rights Act of 1964 and those provisions detailed in U.S. Department of Transportation's (DOT) Federal Transit Administration (FTA) Circular 4702.1B, "Title VI Requirement and Guidelines for the Federal Transit Administration Recipients."

### ABOUT

In addition to being a public transit agency, VVTA also operates a nonprofit division designated as a Consolidated Transportation Services Agency (CTSA). VVTA provides many services to California's High Desert including regular fixed route bus, ADA paratransit, vanpool service, a travel reimbursement program (TRIP) and several partnerships with area nonprofits. VVTA's service area spans nearly 1,000 square miles, featuring service to Adelanto, Apple Valley, Barstow, Hesperia, Victorville, and unincorporated San Bernardino County, including Daggett, Helendale, Hinkley, Lucerne Valley, Newberry Springs, Oak Hills, Oro Grande, Phelan, Piñon Hills, and Wrightwood. Commuter service to Fort Irwin National Training Center (NTC) and connecting service from the High Desert to the Inland Empire is also provided. Additional information and service alerts are available at [VVTA.org](http://VVTA.org) and [Twitter.com/VVTransit](https://twitter.com/VVTransit).

### CONNECT

#### VICTOR VALLEY TRANSIT AUTHORITY

**ADDRESS:** 17150 Smoke Tree Street, Hesperia, CA 92345

**PHONE:** 760-995-3592

**WEB:** [VVTA.org](http://VVTA.org)

**FACEBOOK:** OfficialVVTA

**TWITTER:** @VVTransit

**INSTAGRAM:** VVTransit

**LINKEDIN:** in/VVTA.



# **PUBLIC NOTICE**

## **Rights Under Title VI**

Victor Valley Transit Authority operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with VVTA.

For more information on VVTA's civil rights program and the procedures to file a complaint, contact VVTA Title VI Officer at (760) 995-3586, or at 17150 Smoke Tree Street, Hesperia, CA 92345.

For more information, visit [VVTA.org](http://VVTA.org). A complainant may file a complaint directly with the Federal Transit Administration by filing through the Civil Rights Division Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590. If information is needed in another language, contact (760) 995-3592.

# VICTOR VALLEY TRANSIT



## **NOTIFICAR AL PUBLICO**

### **Los Derechos Bajo El Titulo VI**

Víctor Valley Transit Authority opera sus programas y servicios sin tener en cuenta raza, color y nacionalidad con arreglo al título VI de la Civil Ley de derechos. Cualquier persona que cree que él o ella ha sido agraviado por cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja con VVTA.

Para obtener más información sobre el programa derechos civiles capaz de industrias y los procedimientos para presentar una queja, llame VVTA Titule VI Coordinador al (760) 995-3586, o en 17150 Smoke Tree Street, Hesperia, CA 92345.

Para más información, visite [VVTA.org](http://VVTA.org). Un demandante puede presentar una queja directamente con la Administración Federal De Transito (Federal Transit Administration) por medio de la División de Derechos Civiles (Civil Rights Division), Atención: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590. Si necesita información en otro idioma, contacte al (760) 995-3592.

## TITLE VI PUBLIC NOTICE POSTED LOCATIONS

The VVTA Title VI Program Public Notice is available at [VVTA.org](http://VVTA.org) and posted at the locations listed below:

LOCATION	ADDRESS	CITY
VVTA Barstow Reception Lobby	2641 W. Main Street	Barstow, CA
VVTA Hesperia Reception Lobby	17150 Smoke Tree Street	Hesperia, CA
VVTA Customer Service Lobby	17150 Smoke Tree Street	Hesperia, CA
VVTA Executive Meeting Room	17150 Smoke Tree Street	Hesperia, CA
VVTA Board of Directors Room	17150 Smoke Tree Street	Hesperia, CA
VVTA Public Transit Vehicles	17150 Smoke Tree Street	Hesperia, CA

## TITLE VI COMPLAINT PROCEDURES ENGLISH

As a recipient of federal funding, VVTA is required to comply with Title VI of the Civil Rights Act of 1964 and ensure services and benefits are provided without discrimination to race, color, and national origin. The VVTA Title VI Complaint Procedure outlines a process for Title VI complaints and is consistent with guidelines found in the Federal Transit Administration Circular 4702.1B, dated October 1, 2012. These VVTA Title VI Complaint Procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964, relating to any program or activity administered by VVTA or its sub-recipients, consultants, and/or contractors. Intimidation or retaliation of any kind is strictly prohibited by law.

These 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. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and a transit analyst may be utilized for resolution, at any stage of the process. The transit analyst will make every effort to pursue a resolution to the complaint. Initial interviews with the complainant and the respondent will request information regarding specifically requested relief and settlement opportunities.

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by VVTA may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. The VVTA Title VI Coordinator investigates complaints received no more than 180 days after the alleged incident. VVTA will only process complaints that are complete.

Within 30 business days of receiving the complaint, VVTA will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office. VVTA has 90 days to investigate the complaint. The complainant will be notified in writing of the cause of any planned extension to the 90-day rule.

If more information is needed to resolve the case, VVTA may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, VVTA can administratively close the case.

A case can be administratively closed also if the complainant no longer wishes to pursue their case. After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a Letter of Finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 10 business days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Civil Rights Division, 1200 New Jersey Avenue SE, Washington, DC 20590.



## PROCEDIMIENTOS DE QUEJAS TÍTULO VI

Como beneficiario de fondos federales, Victor Valley Transit Authority (VVTA) está obligado a cumplir con el Título VI del Acta de Derechos Civiles de 1964 y garantizar que los servicios y los beneficios se proporcionan sin discriminación de raza, color y origen nacional. El Procedimiento de Queja VVTA Título VI resumen un proceso de quejas del Título VI y es coherente con las directrices que se encuentran en la Administración Federal de Tránsito Circular 4702.1B, de fecha 1 de octubre de 2012. Estos Procedimientos de Quejas VVTA Título VI aplicará a todas las quejas presentadas en virtud del Título VI del Ley de Derechos Civiles de 1964, relativa a cualquier programa o actividad administrada por VVTA o sus subreceptores, consultores, y / o contratistas. La intimidación o represarías de cualquier tipo está estrictamente prohibido por la ley.

Estos procedimientos no niegan el derecho de las demandantes a presentar quejas formales con otras agencias estatales o federales, o de buscar un abogado privado para las quejas que alegan discriminación. Estos procedimientos son parte de un proceso administrativo que no provee para los remedios que los daños punitivos o remuneración compensatoria por los demandantes. Se hará todo lo posible para obtener pronta resolución de las quejas en el nivel más bajo posible. La opción de la reunión de mediación informal (s) entre las partes afectadas y un analista de tránsito podrá ser utilizado para la resolución, en cualquier etapa del proceso. El analista de tránsito hará todo lo posible para seguir una resolución a la queja. Entrevistas iniciales con el demandante y el demandado va a solicitar información sobre las oportunidades de ayuda y de liquidación solicitado específicamente.

Cualquier persona que cree que él o ella ha sido víctima de discriminación en base a raza, color, u origen nacional por VVTA puede presentar una queja del Título VI puede completar y enviar el Formulario de Quejas del Título VI de la agencia. VVTA investiga las quejas recibidas no más de 180 días después del supuesto incidente. VVTA sólo procesará las quejas que se han completado.

Dentro de los 10 días hábiles de haber recibido la queja, VVTA la revisará para determinar si nuestra oficina tiene jurisdicción. El demandante recibirá una carta de reconocimiento a él / ella informar si la denuncia será investigada por nuestra oficina. VVTA tiene 30 días para investigar la denuncia. El denunciante será notificado por escrito de la causa a cualquier extensión prevista a la norma de los 30 días.

Si se necesita más información para resolver el caso, puede ponerse en contacto con VVTA el denunciante. El demandante tiene 10 días hábiles a partir de la fecha de la carta a enviar la información solicitada para el investigador asignado al caso. Si el investigador no está en contacto con el reclamante o no recibe la información adicional dentro de los 10 días hábiles VVTA puede cerrar administrativamente el caso.

Un caso puede ser administrativamente cerrado también si el demandante ya no desea seguir su caso. Después de que el investigador revisa la queja, él / ella va a emitir una de las dos cartas al denunciante: una carta de cierre o una Carta de Descubrimiento. Una carta cierre resume las acusaciones y afirma que no había una violación del Título VI y que el caso se cerrará. Un Carta de Descubrimiento resume las acusaciones y las entrevistas sobre el supuesto incidente, y explica si alguna acción disciplinaria, la formación adicional del miembro del personal, u otra acción ocurrirá. Si el demandante desea apelar la decisión, él / ella tiene 10 días hábiles después de la fecha de la carta o la Carta de Descubrimiento para hacerlo.

Una persona también puede presentar una queja directamente con la Administración Federal de Tránsito, División de Derechos Civiles, 1200 New Jersey Avenue SE, Washington, DC 20590.



## CIVIL RIGHTS COMPLAINT FORM

<b>Section A:</b>				
Name:				
Address:				
Phone (Home):			Phone (Mobile/Work):	
E-Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
<b>Section B:</b>				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are filing the complaint:				
Please explain why you have filed for a third party: _____				
Please confirm you have obtained permission from the aggrieved party if you are filing on behalf of a third party.			Yes	No
<b>Section C:</b>				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				
_____				
_____				
<b>Section D</b>				
Have you previously filed a Title VI complaint with this agency?			Yes	No
<b>Section C</b>				
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?				
<input type="checkbox"/> Yes <input type="checkbox"/> No				
If yes, check all that apply:				
<input type="checkbox"/> Federal Agency: _____				

# VICTOR VALLEY TRANSIT

<input type="checkbox"/> Federal Court _____	<input type="checkbox"/> State Agency _____
<input type="checkbox"/> State Court _____	<input type="checkbox"/> Local Agency _____
Please provide information about a contact person at the agency/court where the complaint was filed.	
<b>Name:</b>	
<b>Title:</b>	
<b>Agency:</b>	
<b>Address:</b>	
<b>Telephone:</b>	
<b>Section E</b>	
Name of agency complaint is against:	
Contact person:	
Title:	
Telephone number:	

You may attach any written materials or other information you consider relevant to your complaint. Your signature and date required below.

SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

Please submit this form and any supporting documents via mail or in person to the facility or the FTA. Both addresses below:

**Victor Valley Transit Authority**

Attention: Title VI Coordinator  
17150 Smoke Tree Street  
Hesperia, CA 92345

**Federal Transit Administration  
Civil Rights Division**

Attention: Complaint Team  
East Building, 5th Floor – TCR  
1200 New Jersey Avenue, SE  
Washington, DC 20590

## DERECHOS CIVILES FORMA QUEJA

<b>SECCIÓN A:</b>				
Nombre:				
Dirección/Ciudad/ Código Postal:				
Teléfono (Casa):			Teléfono (Móvil/Trabajo):	
E-Mail Address:				
¿Requisitos de formato Accesibles?	Letra Grande		Cinta de Audio	
	TDD		Otro	
<b>SECCIÓN B:</b>				
¿Está usted presentando esta queja en su propio nombre?			Sí*	No
*Si usted contestó "sí" a esta pregunta, pase a la Sección D				
Si no es así, por favor proporcione el nombre y la relación de la persona para la cual usted está presentando la queja:				
Por favor, explique por qué usted ha presentado para un tercero:				
Confirma que has obtenido el permiso de la parte perjudicada, si usted está presentando en nombre de un tercero.			Sí	No
<b>SECCIÓN C:</b>				
Creo que la discriminación que experimenté fue basada en (marque todo lo que corresponda):				
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen Nacional				
Fecha de la discriminación alegada (Mes, Día, Año): _____				
Explique lo más claramente posible lo que pasó y por qué cree que fue discriminado. Describir todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona (s) que lo discriminó (si se conoce), así como los nombres y la información de los testigos en contacto. Si se necesita más espacio, por favor use el reverso de este formulario.				
_____				
_____				
<b>SECCIÓN D</b>				
¿Ha presentado anteriormente una queja del Título VI con esta agencia?			Sí	No
<b>SECCIÓN E</b>				
¿Ha presentado anteriormente una queja del Título VI con esta agencia?				
<input type="checkbox"/> Sí <input type="checkbox"/> No				
En caso afirmativo, marque todas las que correspondan:				

<input type="checkbox"/> Agencia Federal:	
<input type="checkbox"/> Tribunal Federal:	<input type="checkbox"/> Agencia Estatal:
<input type="checkbox"/> Tribunal Estatal:	<input type="checkbox"/> Agencia Local:
Sírvanse proporcionar información acerca de una persona de contacto en la agencia / tribunal donde se presentó la denuncia.	
<b>Nombre:</b>	
<b>Título:</b>	
<b>Agencia:</b>	
<b>Dirección/Ciudad/ Código Postal:</b>	
<b>Teléfono:</b>	
<b>SECCIÓN F</b>	
Nombre de la agencia de queja es contra:	
Persona de Contacto:	
<b>Título:</b>	
Número Telefónico:	

FIRMA: \_\_\_\_\_ FECHA: \_\_\_\_\_

Por favor, envíe este formulario y los documentos de apoyo a través del correo o en persona a la instalación o al FTA, dirección abajo:

**Victor Valley Transit Authority**

Attention: Title VI Coordinator  
17150 Smoke Tree Street  
Hesperia, CA 92345

**Federal Transit Administration  
Civil Rights Division**

Attention: Complaint Team  
East Building, 5th Floor – TCR  
1200 New Jersey Avenue, SE  
Washington, DC 20590

## TITLE VI REPORTING & PRACTICES

**ANNUAL TITLE VI CERTIFICATION AND ASSURANCE:** VVTA submits an annual Title VI Certification and Assurance as part of its annual FTA Certification and Assurance submission.

**TITLE VI COMPLAINT PROCEDURES:** To comply with 49 CFR Section 21.9(b), VVTA has developed and maintains procedures for investigating and tracking Title VI complaints. Procedures for filing a complaint are available to members of the public upon request.

**RECORD TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS:** To comply with 49 CFR Section 21.9(b), VVTA maintains a list of active investigations conducted by entities other than FTA. These include any lawsuits, or complaints naming VVTA, which allege discrimination based on race, color, gender, or national origin. This list includes the date the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the VVTA in response to the investigation, lawsuit, or complaint.

**PROVIDE MEANINGFUL ACCESS TO LEP PERSONS:** VVTA has taken responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of its programs and activities for individuals who are Limited English Proficient (LEP). The public is informed that VVTA will provide materials and assistance in a requested language, at no cost.

**NOTIFY BENEFICIARIES OF PROTECTION UNDER TITLE VI:** To comply with 49 CFR Section 21.9(d), VVTA provides information to the public regarding its Title VI obligations. VVTA informs the public of the protections against discrimination afforded to the public by Title VI. VVTA disseminates this information to the public through its website, transit vehicles, and public places.

**REQUIREMENT TO PROVIDE ADDITIONAL INFORMATION UPON REQUEST:** VVTA understands that at the discretion of FTA, information other than that required by this circular may be requested, in writing, to investigate complaints of discrimination or to resolve concerns about possible Title VI noncompliance.

**VVTA PROCEDURE TO PREPARE AND SUBMIT A TITLE VI PROGRAM:** VVTA acknowledges that FTA requires recipients to report certain general information to determine compliance with Title VI. The collection and reporting of this program constitute the VVTA Title VI Program. To ensure compliance with 49 CFR Section 21.9(b), VVTA documents its compliance by submitting a Title VI Program to FTA's Region IX civil rights officer once every three years.

**VVTA CONDUCTS ANALYSES OF ITS CONSTRUCTION PROJECTS:** To integrate the environmental analyses considerations expressed in the DOT Order on Environmental Justice, VVTA integrates an environmental justice analysis into its National Environmental Policy Act (NEPA) documentation for construction projects. When VVTA prepares documentation for a categorical exclusion (CE), it meets this requirement by completing and submitting FTA's standard CE checklist, which includes a section on community disruption and environmental justice. The VVTA environmental assessment (EA) or environmental impact statement (EIS) integrates the following components into these documents:

- A description of the low-income and minority population within the study area affected by the project (if any), and a discussion of the method used to identify this population (e.g., analysis of Census data, minority business directories, direct observation, or a public involvement process).
- A discussion of all the adverse effects of the project, during and after construction, which would affect the identified minority and low-income population.
- A discussion of all positive effects that would affect the identified minority and low-income population, such as an improvement of transit service, mobility, or accessibility.

- A description of all mitigation and environmental enhancement actions incorporated into the project to address the adverse effects, including, but not limited to, any special features of the relocation program that go beyond the requirements of the Uniform Relocation Act and address adverse community effects such as separation or cohesion issues; and the replacement of the community resources destroyed by the project.
- A discussion of the remaining effects, if any, and why further mitigation is not proposed.
- For VVTA construction projects that traverse predominantly minority and low-income and predominantly non-minority and non-low-income areas, a comparison of mitigation and environmental enhancement actions that affect predominantly low-income and minority areas with mitigation implemented in predominantly non-minority or non-low-income areas. If VVTA determines there is no basis for such a comparison the agency describes why that is so.

**VVTA PROMOTES INCLUSIVE PUBLIC PARTICIPATION:** To integrate into community outreach activities considerations expressed in the DOT Order on Environmental Justice, and the DOT LEP Guidance, VVTA seeks out and considers the viewpoints of minority, low-income, and LEP populations while conducting public outreach and involvement activities. VVTA's public participation strategy offers early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions. These may include:

- Coordinating with individuals, institutions, or organizations and implementing community-based public involvement strategies to reach out to members in the affected minority and/or low-income communities.
- Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.
- Using locations, facilities, and meeting times that are convenient and accessible to low-income and minority communities.
- Using different meeting sizes, formats, or varying the type and number of news media used to announce public participation opportunities, so that communications are tailored to the specific community or population.
- Implementing DOT's policy guidance concerning recipients' responsibilities to LEP persons to overcome barriers to public participation.

## TITLE VI INVESTIGATIONS, COMPLAINTS & LAWSUITS

In compliance with 49 CR Section 21.9(b), VVTA maintains records of investigation, complaints, and lawsuits related to Title VI. The record includes date of incident, a summary of the allegation, the status of the complaint and the action taken. VVTA has had no lawsuits and two complaints alleging discrimination under Title VI since the submittal of its FY2022 Title VI Program. Of the two complaints alleging discrimination, none was substantiated (one complaint is currently under investigation) and VVTA is not aware of any formal Title VI complaints filed with the FTA.

For a summary listing of the Title VI Investigations, Complaints and Lawsuits please see Appendix H.

## TITLE VI REPORTING & PRACTICES FOR LARGE URBAN AREA

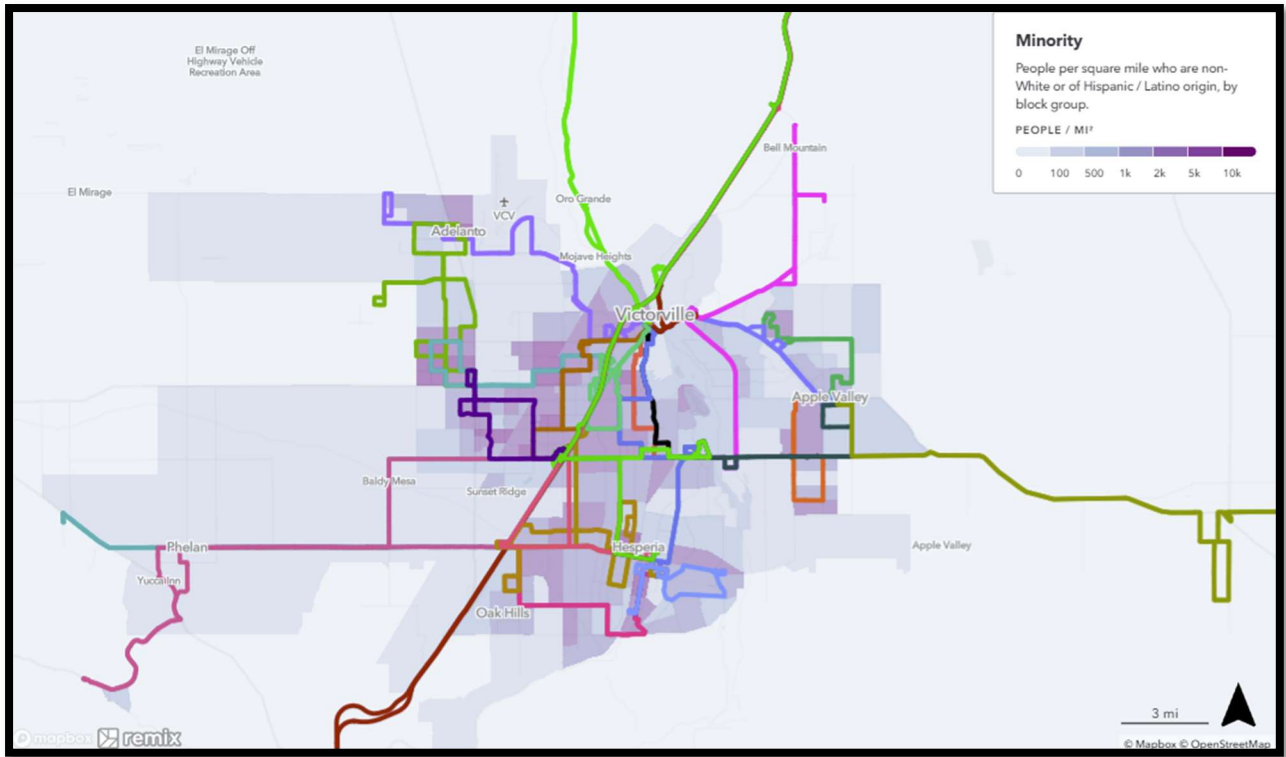
**VVTA COLLECTS DEMOGRAPHIC DATA:** To comply with 49 CFR Section 21.9(b), VVTA collects and analyzes racial and ethnic data showing the extent to which members of minority groups are beneficiaries of programs receiving Federal financial assistance. As part of this process VVTA studies base maps of the agency's service area that includes major streets and highways, fixed transit facilities and major activity centers or transit trip generators such as retail centers, high employment areas, schools, and hospitals. In addition, VVTA tracks the total number and percentage of low-income people as compared to its bus route alignments. Since VVTA ridership is primarily comprised of the transit dependent and since VVTA develops its service around such clusters within its service area, VVTA monitors changes in demographics to assure it is providing service to the neediest segments of the area.

### MAP 1: VVTA SERVICE AREA

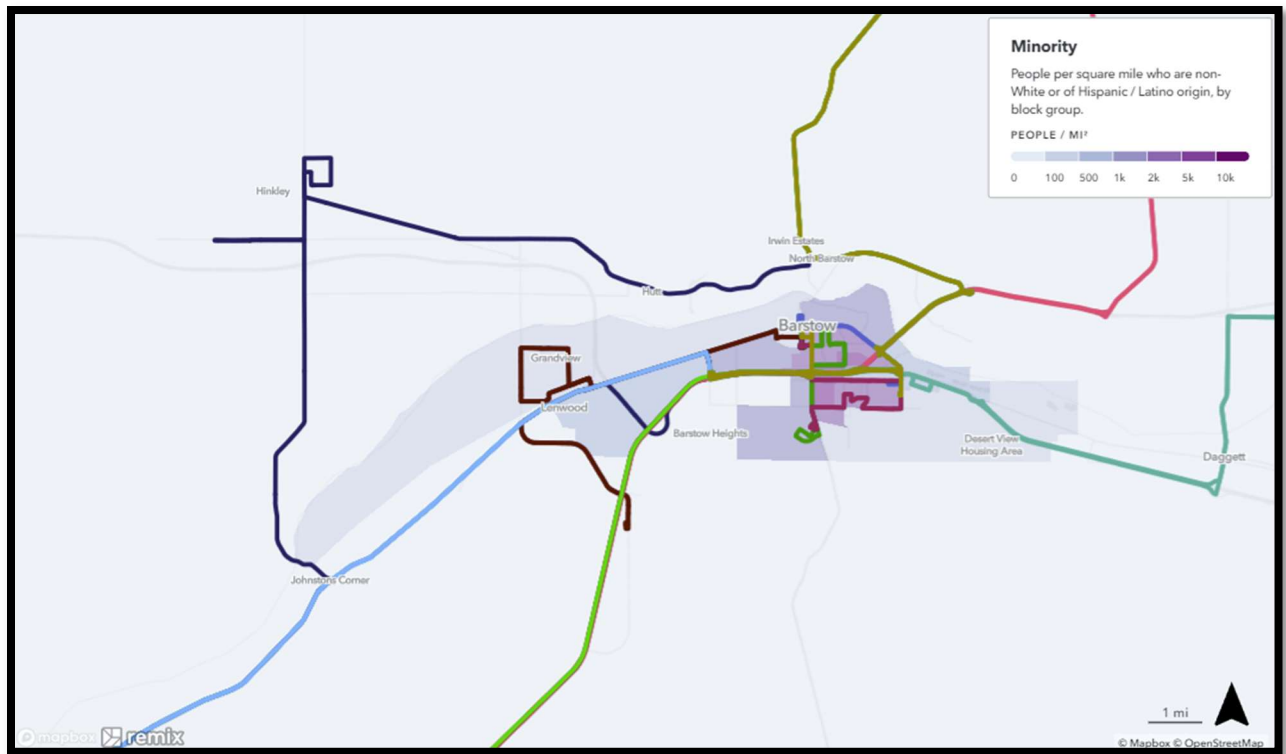
Census Tracts; transit routes; transit centers/facilities; transit amenities (bus stops/bus shelters); major activity centers; Minority populations (at census tract or block group level).



## Hesperia Service Area



## Barstow Service Area

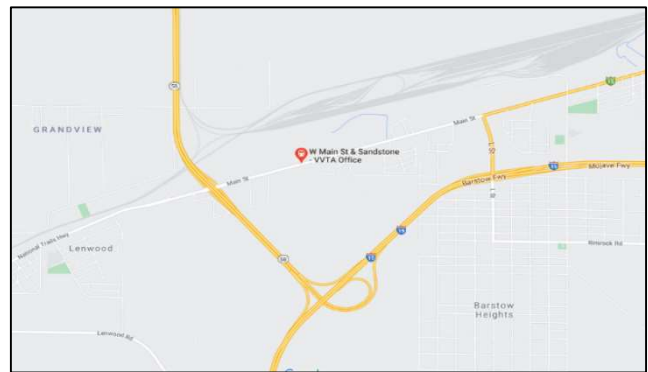


## MAP 2: VVTA SERVICE AREA TRANSIT FACILITIES

In August 2020 VVTA completed a new operations and maintenance facility on Main Street in Barstow to operate on Barstow routes. The facility houses contractor staff and provides space for maintenance and storage for VVTA fleet. This replaces the previous facility on State Street with a new modern energy efficient facility adjacent to the current fueling site. The facility was built on a parcel of land previously purchased as part of the current CNG station.

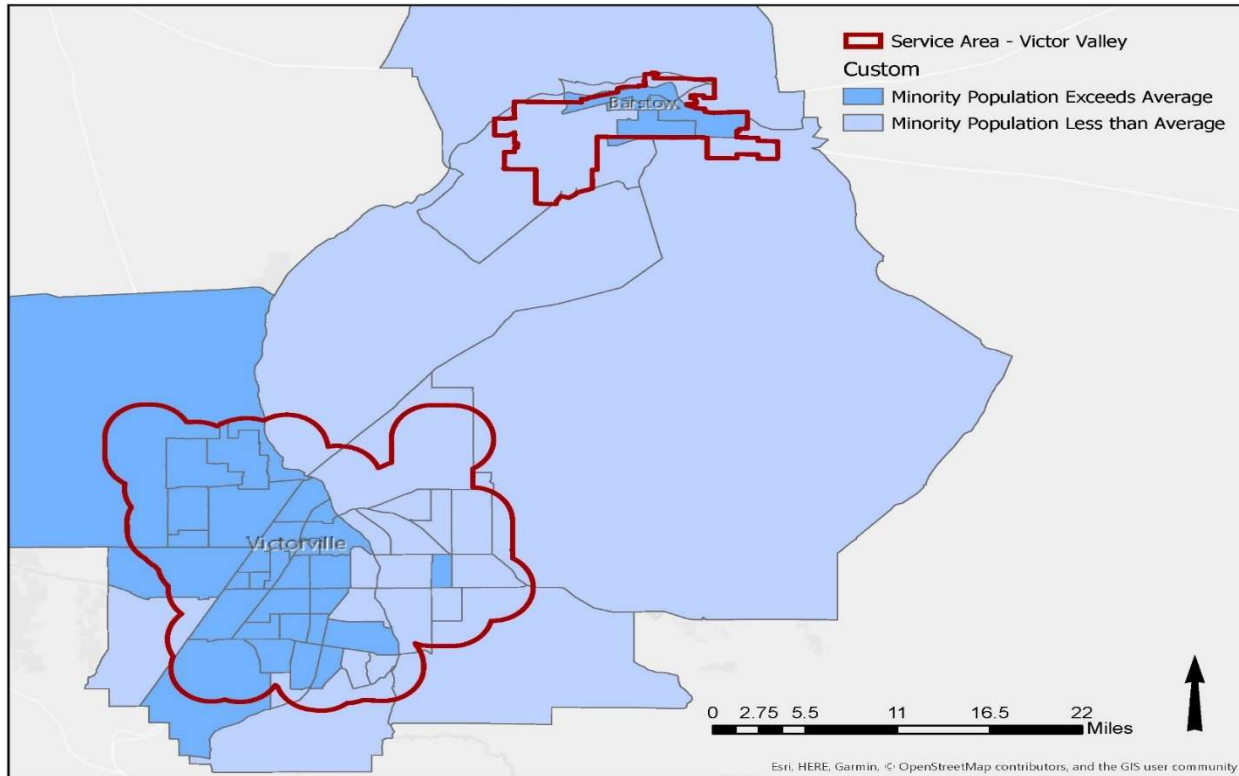
An equity analysis was conducted in March 2024 to assess if there was any retroactive disparate impact or disproportionate burden on the Title VI population defined by race and income. The equity analysis also provided an outline to ensure that VVTA document proper procedures were followed to select and construct the Barstow O&M facility and Title VI principles were adhered to (see Appendix I).

The findings of the equity analysis indicated that the average for the minority population in the vicinity of the Barstow O&M Facility is lower than the service area average, however, the average for low-income population of one of the vicinity block groups is higher than the service area average. This resulted in a disproportionate burden on the low-income populations with the selection of the Barstow O&M Facility Site. Mitigation measures had been taken to comply with Title VI guidelines through the receipt of Conditional Use Permit PCUP-18-0013 from the City of Barstow in January 2018.



## MAP 3: VVTA SERVICE AREA MINORITY POPULATION

Census tracts, blocks, or block groups where the total minority population residing in these areas exceeds the average percentage of minority population for the service area as a whole.



## MAP 4: VVTA SERVICE AREA LOW-INCOME POPULATION

Within the VVTA Service Area, the percentage of low-income population does not meet or exceed the threshold reported by federal sources, there is no map available.

## TITLE VI PROGRAM SPECIFIC REQUIREMENTS

In accordance with FTA C 4702.1B, IV1-2 transit providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more in population are required to set system-wide standards and policies and collect and report demographic and service profile maps and charts as well as survey data regarding customer demographics and travel patterns.

In the 2022 American Community Survey, the population for the VVTA Urbanized Area (UZA) was 364,015. While this exceeds the population threshold of 200,000, VVTA currently operates 47 fixed route vehicles during peak service which does not exceed the peak vehicle threshold of 50 for more extensive reporting. For this reason, the Requirements of Chapter III and set-system wide standards and policies are all that apply to VVTA.

The VVTA service area is ethnically diverse, with approximately 72.5% of the total population classified within 6 minority groups according to the 2022 American Community Survey. The largest minority group in the VVTA service area are persons of Hispanic or Latino descent (57.3%). African Americans make up 11.3% of the population with American Indian, Asian, Native Hawaiian/Pacific Islander and Other comprising 3.8% of the minority population.

When considering changes to transit services, passenger fares, development of new transit facilities, and vehicle deployment VVTA reviews socioeconomic and ethnic population distribution in its service area to evaluate any potential disparate impact on minority communities.

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## SYSTEM-WIDE SERVICE POLICIES

To comply with 49 CFR Section 21.5(b)(2) and 49 CFR Section 21.5(b)(7), Appendix C to 49 CFR part 21, VVTA has enacted system-wide service procedures necessary to guard against service design and operational policies that have disparate impacts. System-wide procedures differ from service standards in that they are not necessary based on a quantitative threshold.

**VEHICLE LOAD:** VVTA studies the ratio of passengers per vehicle, specifically the ratio of passengers to the number of seats on a vehicle during a vehicle's maximum load point. When VVTA observes that the vehicle load on certain routes is consistently exceeding its service standard, VVTA makes plans to add additional vehicles as budget permits. A summary of maximum load factor ratio standards is as follows:

- **Local Service Type Vehicles**
  - 40-foot vehicles have a 1.5 maximum load factor ratio.
  - 35-foot-low floor vehicles have a 1.5 maximum load factor ratio.
  - 35-foot-high floor vehicles have a 1.4 maximum load factor ratio.
  - 33-foot cutaway vehicles have a 1.5 maximum load factor ratio.
  - 32-foot-low floor cutaway vehicles have a 1.4 maximum load factor ratio.
- **Inter-City Service Type Vehicles**
  - 40-foot single door vehicles have a 1.0 maximum load factor ratio.
- **Commuter Service Type Vehicles**
  - 45-foot commuter vehicles have a 1.0 maximum load factor ratio.

Load factor standards by vehicle type are listed in the table below.

VEHICLE TYPE	SERVICE TYPE	CAPACITY			MAX LOAD FACTOR
		SEATED	STANDING	TOTAL	
40' bus	Local Service	40	20	60	1.5
35' High Floor	Local Service	38	15	53	1.4
40' NABI Single Door	Commuter	35	0	35	1.0
45' MCI	Commuter	53	0	53	1.0
40' El Dorado Single Door	Intercity	45	0	45	1.0
35' Low Floor	Local Service	31	15	46	1.5
32' Low Floor	Local Service	27	11	38	1.4
33' Cutaway	Local Service	30	15	45	1.5

A review of load factors by route conducted in Fall of 2023 as part of VVTA's Comprehensive Operational Analysis (COA) identified that there was only one route in which load factor standards were exceeded (Route 114 during the AM Peak). (see table below). When completed in June 2024, the COA will identify changes to routes and schedules that will provide compliance with load factor standards.

Route	Median Load			
	AM Peak	Midday	PM Peak	Evening
1	0.10	0.14	0.15	0.09
111	0.21		0.17	
114	1.66		0.31	
115	0.23		0.06	
15	0.13	0.16	0.21	
2	0.07	0.11	0.11	0.09
21	0.04	0.08	0.07	0.09
22	0.07	0.07	0.06	0.08
23	0.06	0.07	0.07	0.18
25	0.04	0.05	0.05	0.03
28	0.03	0.05	0.09	0.10
29	0.04	0.07	0.07	0.03
3	0.07	0.23	0.25	0.27
31	0.11	0.12	0.22	0.10
32	0.22	0.11	0.12	0.33
33	0.05	0.08	0.08	0.06
40	0.05	0.11	0.05	0.04
41	0.07	0.17	0.17	0.09
42	0.05	0.06	0.05	0.03
43	0.10	0.14	0.08	0.06
47	0.03	0.05	0.06	0.04
50	0.15	0.36	0.60	0.52
50X	0.26	0.25	0.17	
52	0.10	0.18	0.17	0.30
56	0.17	0.51	0.72	0.84
6	0.04	0.17	0.20	0.04
55	0.08	0.15	0.12	0.09
53	0.15	0.17	0.27	0.19
54	0.19	0.16	0.19	0.25
64	0.05	0.10	0.07	0.16
68	0.06	0.14	0.33	0.13
118			0.14	

**VEHICLE HEADWAY:** VVTA studies the time interval between two vehicles traveling in the same direction on the same route. VVTA also studies load factors on its busiest routes. VVTA increases service frequency on routes and at times that standing loads are recurrent and as budget permits.

**ON-TIME PERFORMANCE:** VVTA has an on-time performance standard of 0 minutes early and 5 minutes late on fixed routes. The on-time criteria for complementary paratransit are up to 10 minutes before and 30 minutes after a confirmed reservation. VVTA has an on time standard of 85% for all services.

**SERVICE AVAILABILITY:** VVTA has a standard to distribute service so that 80% of all residents in the service area are within one-fourth of a mile of bus service. VVTA uses deviated fixed route service in those areas with the lowest population density. VVTA has a guideline for bus stop spacing. In urbanized areas, bus stops should be no closer than 0.15 miles and no further than 0.25 miles. In non-urbanized (or rural) areas, bus stops should be no closer than 0.50 miles. Non-urbanized areas offer flag down bus stop service and include Daggett, Helendale, Hinkley, Lucerne Valley, Newberry Springs, Oak Hills, Oro Grande, Phelan, Piñon Hills, and Wrightwood.

**DISTRIBUTION OF TRANSIT AMENITIES:** VVTA transit amenities are solely determined, installed, and maintained by the separate jurisdictions which comprise the VVTA Joint Powers Authority. VVTA makes recommendations to the jurisdictions based on boardings, alightings, overall route ridership, and demographics.

**VEHICLE ASSIGNMENT:** Vehicle assignment refers to the process by which transit vehicles are placed into service on routes throughout the transit system to ensure that all communities receive the same benefits derived from the transit vehicles. VVTA's entire fleet of transit buses is 100 percent ADA compliant, with wheelchair securement devices, ramps, and kneeling capabilities. Also standard are air conditioning, bike racks and voice annunciators.

Vehicle age is also considered a benefit, as it is generally considered a proxy for the condition of the vehicle. VVTA has a low average fixed-route fleet age of 5.5 years. Barring restrictions of certain vehicle fleets, (i.e., inability for certain buses to travel on narrow streets or zero-emission battery buses not able to travel on longer routes), vehicles are distributed across the route network equitably by age.

Listed below is the breakdown of the transit vehicles within the VVTA fleet. The list does not include vehicles used for administrative and supervisory purposes.



# VICTOR VALLEY TRANSIT

FIXED ROUTE VEHICLES					
QUANTITY	YEAR	MANUFACTURER/MODEL	SEATS/WHEELCHAIRS	SERVICE TYPE	TITLE
1	2010	NABI 40LFW, Cummins	38/2	Fixed-Route	VVTA
9	2014	Eldorado Axess, Cummins	33/2	Fixed-Route	VVTA
2	2015	Eldorado XHF, Cummins	38/2	Fixed-Route	VVTA
1	2015	Eldorado Axess, Cummins	33/2	Fixed-Route	VVTA
5	2015	MCI D4500, Cummins	57	Fixed-Route	VVTA
3	2016	Eldorado Axess 40', Cummins	43/2	Fixed-Route	VVTA
12	2018	Eldorado Axess 40', Cummins	43/2	Fixed-Route	VVTA
4	2018	Eldorado Axess 35', Cummins	35/2	Fixed-Route	VVTA
10	2019	New Flyer Xcelsior, Electric	40/2	Fixed-Route	VVTA
2	2020	Eldorado Axess 40', Cummins	43/2	Fixed-Route	VVTA
6	2020	Eldorado EZ Rider II, Cummins	33/2	Fixed-Route	VVTA
2	2021	New Flyer Xcelsior, Electric	40/2	Fixed-Route	VVTA
5	2022	Eldorado Axess 40', Cummins	43/2	Fixed-Route	VVTA
4	2022	Eldorado EZ Rider II, Cummins	33/2	Fixed-Route	VVTA
4	2022	Eldorado Axess 35', Cummins	35/2	Fixed-Route	VVTA
5	2023	Eldorado Axess 40', Cummins	43/2	Fixed-Route	VVTA
75	<b>TOTAL</b>				

PARATRANSIT VEHICLES					
QUANTITY	YEAR	MANUFACTURER/MODEL	SEATS/WHEELCHAIRS	SERVICE TYPE	TITLE
2	2010	Dodge Caravan	5/1	ADA	VVTA
2	2011	Eldorado Aerotech, Ford E450	12/2	ADA	CALTRANS
2	2015	Eldorado Aerotech, Ford E450	16/2	ADA	VVTA
5	2016	Eldorado Aerotech SUP MB, Ford E450	20	ADA	VVTA
4	2016	Eldorado Aerotech, Ford E450	20	ADA	VVTA
10	2017	Eldorado Aerotech, Ford E450	16/5	ADA	VVTA
16	2019	Eldorado Aerotech, Ford E450	16/2	ADA	CALTRANS
2	2019	Eldorado Aerotech, Ford E450	14/2	ADA	VVTA
3	2021	Dodge Ram Lonestar Promaster 3500	8/2	ADA	VVTA
46	<b>TOTAL</b>				



## TITLE VI EQUITY ANALYSIS

VVTA, through their consultant Transportation Management & Design (TMD), has conducted a service equity analysis during the review period as part of the 2024 Comprehensive Operational Analysis. The equity analysis revealed VVTA had no disparate impact or disproportionate burden findings in relation to proposed service changes. A copy of the service equity analysis is included within the 2024 Comprehensive Operational Analysis.

## NON-ELECTED COMMITTEE MEMBERS

The VVTA Board of Directors is comprised of elected council members from each of the VVTA member jurisdictions and two County Supervisors. VVTA Board members are appointed to the VVTA Board by their fellow council members in each jurisdiction. The San Bernardino County First and Third District Supervisor also holds a seat on the Board. The VVTA Board is comprised of a racially diverse representation of the jurisdictions they serve.

<b>AFRICAN AMERICAN</b>	<b>ASIAN</b>	<b>CAUCASIAN</b>	<b>LATINO</b>	<b>NATIVE AMERICAN</b>
<b>14%</b>	<b>0%</b>	<b>57%</b>	<b>29%</b>	<b>0%</b>

**BOARD OF DIRECTORS TITLE VI APPROVAL**

**Pending Board Approval**

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## Sub-Recipient Monitoring Program

VVTA does not pass-through funding to any sub-recipient agency.

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## LIMITED ENGLISH PROFICIENCY (LEP) PLAN

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### BACKGROUND SUMMARY

Victor Valley Transit Authority (VVTA) understands individuals who have a limited ability to read, write, speak, or understand English are limited English proficient, or “LEP.” In using the source: 2022 American Community Surveys VVTA recognizes that nationwide the number of persons reporting that they do not speak English at all, or do not speak English well, grew from 11.6% to 12.1% between 2010 and 2020. Among limited English speakers within the VVTA service area, which includes Adelanto, Apple Valley, Barstow, Hesperia, and Victorville, Spanish is the language most frequently spoken.

VVTA hopes its efforts for outreach to LEP persons may attract riders who would otherwise be excluded from participating in the service because of language barriers and, ideally, will engender riders to continue using the system after they are proficient in English and/or have more transportation options. VVTA’s community outreach will be designed to identify appropriate language assistance measures that can assist the agency in identifying the transportation needs of LEP individuals and ensures that an agency’s transit routes, hours and days of service, and other service parameters are responsive to the needs of these populations.

The Victor Valley Transit Authority (VVTA) supports the goals of the DOT LEP Guidance to provide meaningful access to its services by LEP persons.

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### FACTOR 1: APPLYING THE FOUR-FACTOR FRAMEWORK

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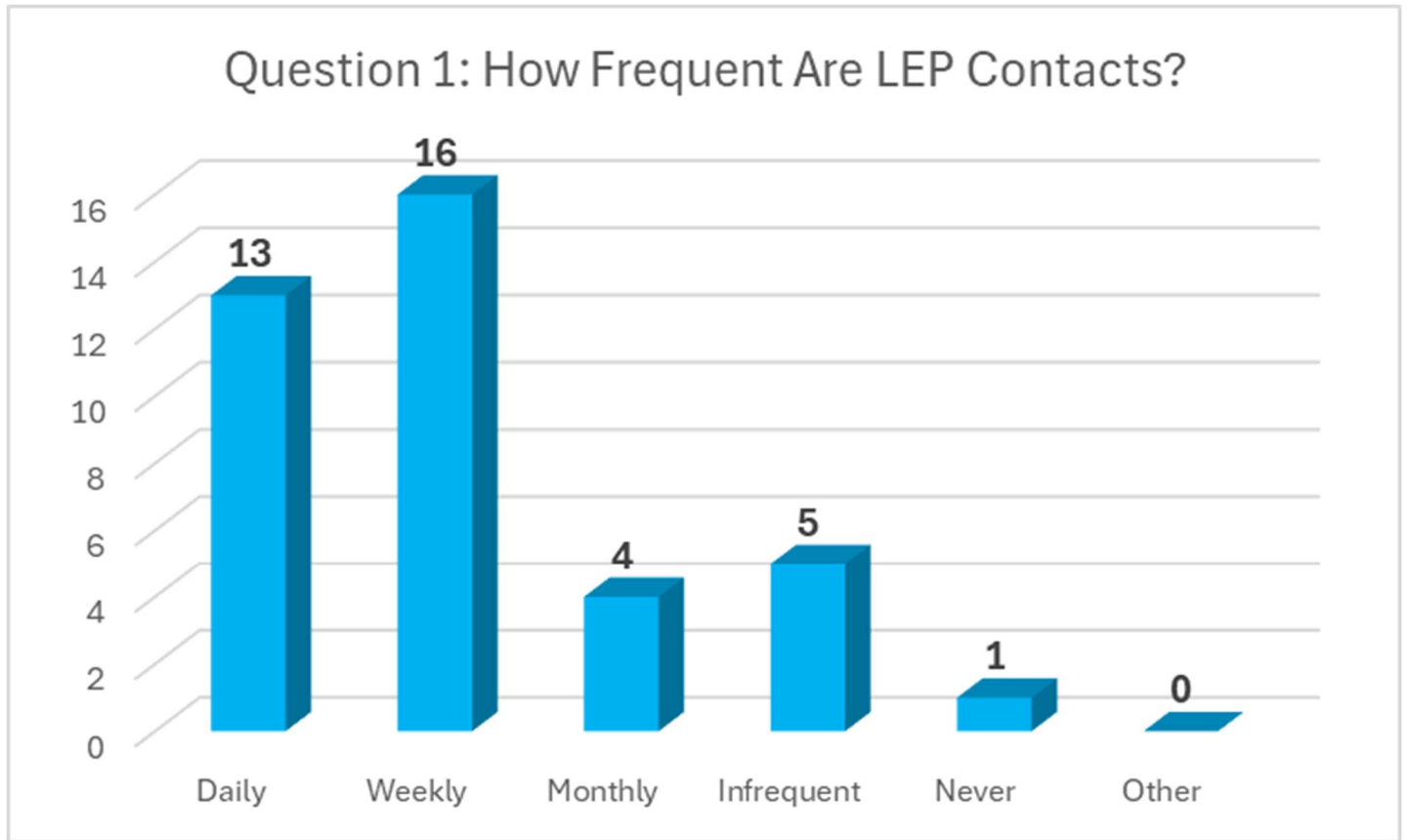
#### Number & Proportion of LEP Persons Served or Encountered in Eligible Service Population

**Task 1, Step 1:** Examine prior experiences with LEP individuals.

VVTA conducted a staff survey that received 39 respondents. The survey questions were provided anonymously from respondents who included customer service representative, drivers, and route supervisors.

## In this last year, how frequently did you come into contact with LEP persons?

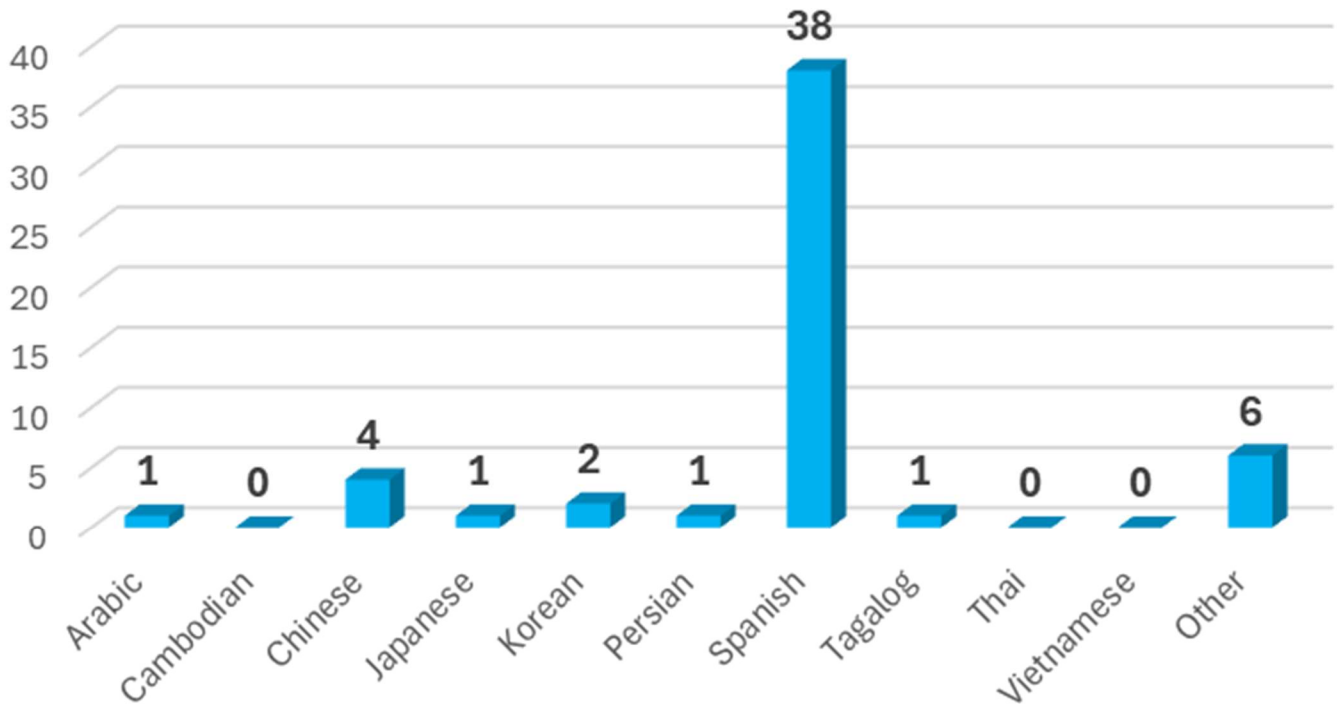
Of the 39 respondents, 16 interacted weekly, 13 interacted with LEP persons daily, 5 interacted infrequently, and 4 interacted at least once per month.



## If you were able to identify it, what languages do the LEP individuals you met speak (check all that apply)?

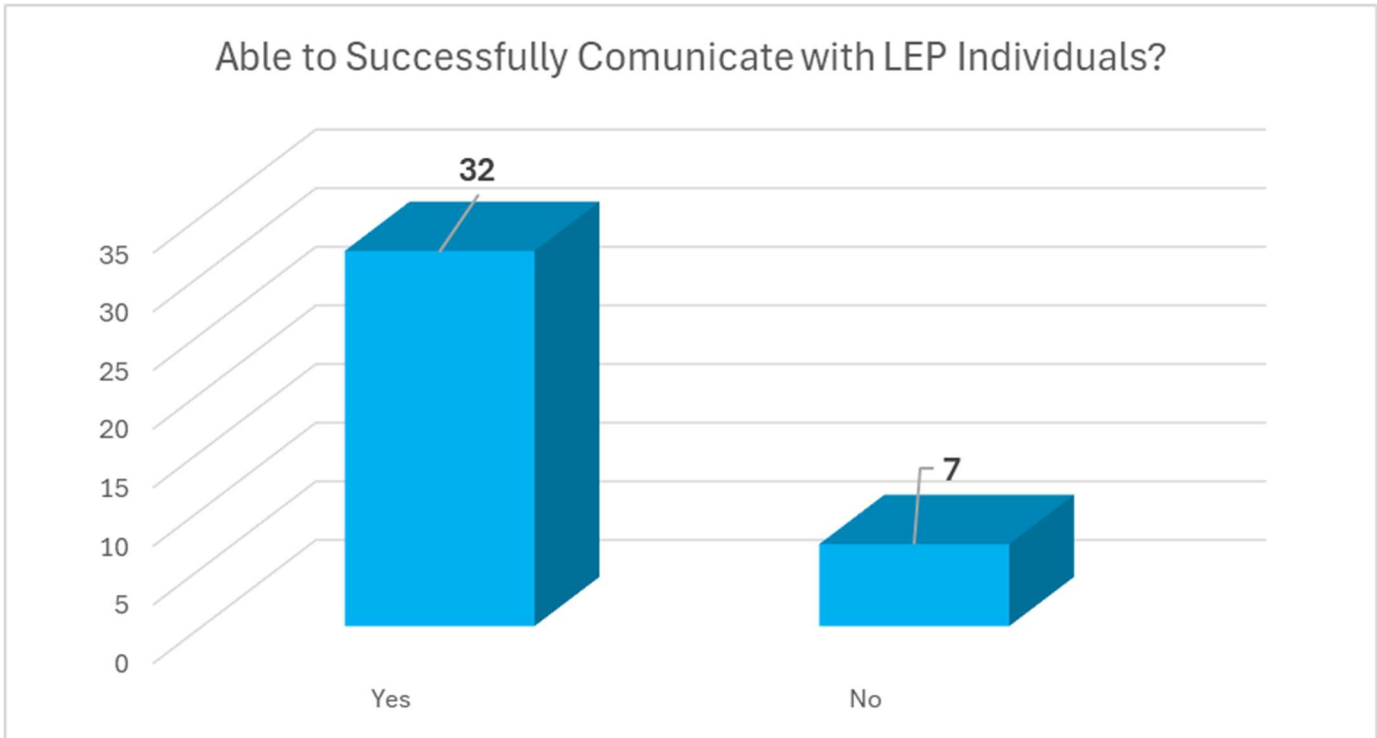
Of the 39 responses, 38 respondents interacted with Spanish speakers, 6 with Other languages (including Sign Language), 4 with Chinese dialects, and 2 with Korean speakers.

## Question 2: Which Languages Are Spoken?



### Were you able to successfully communicate with individuals who are limited English proficient? If YES, how were you able to communicate?

Of those 39 LEP person interactions, staff members successfully communicated for 32 of the interactions. Success was attributed to being multilingual, familiarity with the language, referring the LEP person to a multilingual staff member or passenger, utilizing Google Translate, communicating slowly, and communicating via gestures.



## What kinds of information were these LEP individuals seeking? What kinds of questions did they most frequently ask? (Please provide any topics or frequently asked questions)

The types of information LEP individuals were seeking included route and fare information, arrival and departure times, bus pass sales and information, which routes serve their destination or specific location, the required connections for a trip, other services offered and ADA questions. Drivers were able to show passenger departure and destination mapping information via mobile phones.

### Task 1, Step 2: Become familiar with data from The U.S. Census

VVTA accessed the US Bureau of Census and LEP.Gov to help identify LEP populations.

### Task 1, Step 2A: Identify geographic boundaries of area VVTA serves.

For VVTA's service area, the cities of Adelanto, Barstow, Apple Valley, Hesperia, Victorville and the San Bernardino County areas of Lucerne Valley, Oak Hills, Phelan, Daggett, Hinkley, Piñon Hills, Silver Lakes, and Wrightwood serve as appropriate boundaries.

### Task 1, Step 2B: Obtain Census data on the LEP population in VVTA service area.

VVTA utilized 2022 American Community Survey 5-Year Estimates. The combined population for these five regions is 373,093, of which 41,203 are LEP individuals which account for 11% of the population.



JURISDICTION	POPULATION				
	TOTAL	LEP	LEP	SPANISH LEP	
		TOTAL	%	TOTAL	%
	373,093	41,203	11.0%	37,003	9.9%
ADELANTO	37,960	5,338	14.1%	5,210	13.7%
APPLE VALLEY	75,603	5,521	7.3%	4,673	6.2%
BARSTOW	25,235	1,432	5.7%	1,253	5.0%
HESPERIA	99,878	11,714	11.7%	11,058	11.1%
VICTORVILLE	134,417	17,198	12.8%	14,809	11.0%

**Task 1, Step 2C: Analyze the data VVTA has collected.**

According to 2022 American Community Survey data specific to the VVTA service area, the primary language population group of those who speak English less than “very well” is the Spanish language population group, which comprises 9.9% of the total population. VVTA adheres to the provisions established in Executive Order 13166, which require services to be provided for persons with Limited English Proficiency (LEP). VVTA is compliant with the “Safe Harbor” provision identified in the FTA C4702.1B Chapter III 9.c. for recipients regarding translation of written materials for LEP population. VVTA and its operations contractor, Keolis, employs multiple employees who can translate and interpret Spanish. Additionally, one employee is also fluent in Tagalog and Bicol. These individuals contribute to the translation of key documents, which includes pertinent service alerts, public notices, and media releases.

**Task 1, Step 2D: Identify any concentrations of LEP persons within VVTA service area.**

There is a concentration of LEP Hispanics in the area in Old Town Victorville, which is bordered by D Street on the north, Hesperia Road on the east, I-15 to the west and Forest Avenue to the South. The only other concentration is in the area of Main Street and 3rd street in Hesperia.

**Task 1, Step 3: Consult state and local sources of data.**

According to California Department of Education Data Reporting Office data recorded for the 2023 – 2024 school year, of all English Learner Students tabulated from school districts in the VVTA service area, which includes Adelanto, Apple Valley, Barstow, Hesperia, and Victorville, Spanish ELS students accounted for 96.2% of ELS student population. These figures are consistent with U.S. Census Bureau data as well as anecdotal data.

JURISDICTION	POPULATION		
	TOTAL ENGLISH LEARNER STUDENTS	SPANISH ENGLISH LEARNER STUDENTS	
		TOTAL	%
		<b>11,678</b>	<b>11,230</b>
ADELANTO	1,344	1,308	97.3%
APPLE VALLEY	1,585	1,474	93.0%
BARSTOW	558	530	95.0%
HESPERIA	4,473	4,393	98.2%
VICTORVILLE	3,718	3,525	94.8%

Source: California Dept. of Education – English Learner Students by Grade

## Task 1, Step 4: Reach out to community organizations that serve LEP persons.

### Task 1, Step 4A: Identify community organizations.

VVTA has identified and continually monitors organizations that work directly with LEP individuals.

### Task 1, Step 4B: Contact relevant community organizations.

Through the active efforts of the VVTA’s Marketing, CTSA, and Brokerage program staff, VVTA maintains regular contact with relevant community organizations that work directly with LEP populations within the VVTA service area. VVTA communicates with these organizations and directly engages LEP populations through presentations and community forums, which are translated into Spanish.

### Task 1, Step 4C: Obtain information

VVTA is an active partner with organizations that directly serve underrepresented minority communities that include LEP persons. These organizations, which includes schools and nonprofits, directly engage individuals from minority communities and proactively represents as well as advocates for them in transportation planning and decision making. Through the VVTA Marketing, CTSA, and Brokerage program staff, VVTA is uniquely situated to understand, to ascertain, and adapt to the evolving needs of the underserved and LEP populations through these partnerships, which include Victor Valley Community Services Council (minorities/seniors/disabled), St. Mary’s Medical Center, Abundant Living Church, Foothill Aids Project (minorities/disabled). Other examples include:

- Foothill Aids Project
- Women of Noble Character
- Barstow Dignity Station
- Benjamin E Jones Community Resource Center
- Another Level for Women
- New Hope Village
- The Gate Church of the High Desert
- Rolling Start
- Family Assistance Program
- Mirus Secondary School
- Barstow Senior Center
- High Desert Homeless Shelter
- Moses House Ministries
- Victor Valley Community Services Council
- Adelanto Senior Center
- St. Mary's Medical Center
- Church for the Whosoever
- Desert Communities United Way
- ESP/CalWORKs – Victorville
- ESP/CalWORKs
- Department of Aging and Adult Services
- Public and Specialized Transportation Advisory and Coordination Council (PASTACC),
- Senior Centers (for all service areas)
- Homelessness Provider Network
- Family Preparedness Fairs
- Health Centers (for all service areas)
- Family Resource Centers
- Desert/Mountain Special Education Local Plan Area (SELPA)

## FACTOR 2: FREQUENCY LEP INDIVIDUALS ENGAGE VVTA PROGRAMS, ACTIVITIES, AND SERVICES

### Task 2, Step 1: Review the relevant programs, activities, and services VVTA provides.

The VVTA website is available in English and Spanish. VVTA also provides Car Cards on the buses, which are often translated to Spanish; recordings on the buses are made in both languages and VVTA has installed an Infotainment system onboard buses which provides messages to passengers in English and Spanish. VVTA also employs bi-lingual customer service and dispatchers so even if the bus operator cannot translate a translation is available. If a request is made for other languages VVTA will use the services of a commercial telephone translation service. If requested, VVTA will do the same for all its public meetings. VVTA's website is also available in multiple languages with Google translate. VVTA attends the High Desert Hispanic Chamber of Commerce's monthly meeting as often as possible and meets with Victor Valley College and area high schools.



**Ahora eres libre de IR.**

**ESTUDIANTES (K-12) VIAJAN GRATIS todos los días, en todos los sistemas de autobuses del condado de San Bernardino.**



**TRABAJANDO JUNTOS PARA NUESTROS PASAJEROS**

Una nueva asociación entre **VICTOR VALLEY TRANSIT** y el 

Presentamos el **Departamento del Sheriff** **Equipo de Victor Valley Transit**

**VIAJES SEGUROS VVTA**

Obtenga más información en [vvta.org/saferides](http://vvta.org/saferides)



### Task 2, Step 2: Review information obtained from community organizations.

VVTA actively monitors news, events, and social media platforms applicable to the Spanish population within its service area. Additionally, through working relationships with community partners, such as those referenced above, VVTA actively reviews community service organization publications and directly engages LEP populations through community forums throughout the year, where VVTA staff actively presents its services to and receives feedback from the Spanish population, an example of which is are those Spanish-speaking forums regularly produced by Community Health Action Network, which VVTA takes part in.

### Task 2, Step 3: Consult directly with LEP persons.

VVTA regularly conducts bilingual passenger surveys, including a September 2023 survey in English and Spanish for the VVTA Comprehensive Operational Analysis (COA). This included an onboard survey for fixed route passengers. These surveys served several purposes, which include providing a profile of current VVTA riders, identifying the perception VVTA customers have about the bus service provided, identifying the types of improvements customers would prefer to see, and identifying the factors that influence passenger's use of the

bus. Besides these stated purposes, the COA survey was used to understand transfer patterns of VVTA passengers. These surveys, which were each conducted in English and Spanish and are included below, satisfied Federal reporting requirements under Title VI of the Civil Rights Act of 1964.

Additionally, VVTA staff and management maintains an organizational culture, which proactively engages LEP individuals on buses, at bus stops, and transfer locations, informing these individuals of the types of language assistance the agency provides. VVTA also collects anecdotal information directly from LEP individuals and their groups through the VVTA Marketing community outreach efforts, which helps meet the needs of LEP individuals.

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## **FACTOR 3: THE IMPORTANCE OF LEP PERSONS TO YOUR PROGRAM, ACTIVITIES, AND SERVICES**

### **Task 3, Step 1: Identify VVTA's most critical services.**

VVTA understands its services are used for life-sustaining activities, such as transportation to and from work, non-emergency medical appointments, social service appointments, and grocery shopping, as well as life-enriching activities, which include school, recreation, and social events and also as a connector service to other transportation services. VVTA provides service from Barstow, CA into Victorville; and into the San Bernardino Valley providing transportation to Arrowhead Regional Medical Center; Kaiser Permanente Hospital; and various government and social services. There is a strong need for LEP populations to use these services, to expect good communication on how to make connections, and to respond to emergency situations.

### **Task 3, Step 2: Review input from community organizations and LEP persons**

Through VVTA's public outreach efforts and staff interactions with passengers and advocates, VVTA understands its services are critical to all passengers, including LEP passengers. VVTA complies with all federal and state regulations before making fare or services changes. Additionally, VVTA considers Title VI target populations in its outreach and marketing efforts.

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## **FACTOR 4: THE RESOURCES AVAILABLE TO THE RECIPIENT AND COSTS**

### **Task 4, Step 1: Inventory language assistance measures currently provided, along with associated costs.**

To meet the needs of the LEP population, VVTA produces materials in English and Spanish and will use, if requested, commercial telephone translation vendors. VVTA also tracks any language assistance requests from LEP populations other than Spanish. With its size, VVTA does not have a community outreach office that would determine the costs associated with translating documents, contracting with language interpreters, producing pictographs, installing multilingual technology, and other language assistance.

### **Task 4, Step 2: Determine what, if any, additional services are needed to provide meaningful access.**

As stated in Task 4, Step 1: Other than Spanish, VVTA has determined that information does not need to be translated into additional languages. However, additional oral or written language services will be provided on request, and existing language assistance would be made available on a more widespread basis if requested. VVTA continuously assesses specific measures such as periodically analyzing data points, local newspapers, community newsletters, information provided by bus drivers, ADA reservationists, dispatchers, and customer

service representatives to determine what is needed to continue to provide meaningful access to its transit services.

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### **Task 4, Step 3: Analyze your budget.**

It is not practicable for VVTA to assign a percentage of the agency's capital and/or operating budget to additional language assistance expenses as the agency already includes translation into other languages (Spanish) in many of its marketing efforts and on the website. VVTA commits to using a portion of its marketing budget for bilingual printed materials, car cards, rider alerts, and on-board infotainment announcements. Furthermore, VVTA continues to disseminate information to the public on how to access translation services from VVTA for its Board meetings.

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### **Task 4, Step 4: Consider cost effective practices for providing language services.**

VVTA looks to access language assistance products that have been developed and paid for by local, regional, or state government agencies and will also continue to use and hire more bilingual staff to provide language assistance at a minimal increase in cost. VVTA also considers telephonic and video conferencing interpretation services, translating vital documents posted on Web sites, and pooling resources and standardizing documents to reduce translation costs.

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## **DEVELOPING AN IMPLEMENTATION PLAN FOR LANGUAGE ASSISTANCE**

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### **Task 1: Identifying LEP Individuals Who Need Language**

Beyond the Spanish speaking LEP population VVTA attempts to identify additional interfaces which may not necessarily come from the larger LEP populations in the area. VVTA will use the "I Speak" card, included in Appendix G, and tracks interfaces to determine if any significant language groups are identified for which VVTA would translate information in those languages.

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### **Task 2: Language Assistance Measures**

For in person communication, where verbal communication is not working but there is an internet connection, staff uses Google Translate. Smart phone applications are downloaded for languages such as Spanish. A bus operator will ask for others on-board to volunteer to translate if he or she is unable to communicate. Customer service has bilingual (Spanish) employees on duty during key operational hours. If this is not possible, the employee will transfer the person to a translation service. While it is the responsibility of the operations contractor to have this option in place, VVTA maintains an account and regularly uses the services from Rise Interpreting, 6887 Magnolia Avenue, Riverside, CA 92506, (951) 565-4422, info@riseinterpreting.com.

### **For commercial translators VVTA will ensure the following, as needed:**

- The agency will ask the interpreter or translator to demonstrate that he or she can communicate or translate information accurately in both English and the other language.
- The agency will inform the interpreter or translator in specialized terms and concepts associated with the agency's policies and activities.
- The agency will monitor if the interpreter or translator deviates into a role as counselor, legal advisor, or any other role aside from interpreting or translator, and if so, advise them to translate only.
- The agency will ask the interpreter or translator to attest that he or she does not have a conflict of interest in the issues that they would be providing interpretation services.



## TASK 3: Training Staff

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### **Task 3, Step 1: Identify agency staff that are likely to come into contact with LEP persons as well as management staff.**

VVTA targets training to the staff, including drivers, customer service representatives, and marketing staff who may have frequent contact with LEP persons.

### **Task 3, Step 2: Identify existing VVTA staff training opportunities.**

Portions of this plan will be included in the orientation for new employees. Existing employees, especially managers and those who work with the public will periodically take part in re-training or new training sessions to keep up to date on their responsibilities in regard to LEP persons. These shall occur at least yearly at planned Safety Meetings.

### **Task 3, Step 3: Design and implement LEP training for VVTA staff.**

VVTA and its current operations contractor, Keolis, shall use a standard presentation concerning recipients' responsibilities to persons with limited English proficiency.

This training includes:

- A summary of the VVTA / Keolis's responsibilities under the DOT LEP Guidance.
- A short summary of the agency's language assistance plan.
- A summary of the number and proportion of LEP persons in the agency's service area, the frequency of contact between the LEP population and the agency's programs and activities, and the importance of the programs and activities to the population; and
- A description of the agency's cultural sensitivity procedures and practices.

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## TASK 4: PROVIDING NOTICE TO LEP PERSONS

VVTA uses an automated telephone voice mail and menu system, which is available in English and Spanish. The system provides real-time bus routing and scheduling information as well as information about available language assistance services and how to receive them.

- VVTA posts signs in such a manner that LEP persons can learn how to access those language services at initial points of contact and that it is a free service.
- VVTA places this information in Spanish in brochures, booklets, website, and in outreach and recruitment information.

### **Task 4, Step 1: Inventory existing public service announcements & community outreach VVTA performs. Samples in Appendix F**

VVTA uses:

- Signs and handouts available in vehicles.
- Announcements in vehicles using the Infotainment system.
- VVTA website and social media.
- Customer service phone lines and text messaging service.
- Newspaper, radio, and television advertisements.
-

## **Task 4, Step 2: Incorporate notice of the availability of language assistance into existing outreach methods**

VVTA documents in English will include a notice of document availability in other languages.

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## **Task 4, Step 3: Conduct targeted community outreach to LEP populations.**

VVTA performs outreach to agencies that serve LEP (usually Spanish) populations and will attend community meetings and events to inform people of the agency's service in general and that language assistance is available. Notification will also be distributed the High Desert Hispanic Chamber for use in their English classes for speakers of other languages.

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## **TASK 5: MONITORING & UPDATING THE LEP PLAN**

### **VVTA will evaluate and update the LEP Plan by:**

- Tracking LEP populations encountered to determine if new translations are needed and in what area of service.
- Increasing contact with language groups.
- Determining if existing assistance efforts are meeting the needs of LEP persons.
- Consider new LEP assistance with major service changes.
- Developing clear goals and objectives for staff and management; and
- Committing an appropriate portion of the marketing budget to LEP services and publications.



## PUBLIC PARTICIPATION PLAN

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### PURPOSE OF PUBLIC PARTICIPTION PLAN

The purpose of the Public Participation Plan is to assure and improve access to VVTA's decision-making process for low income, minority and Limited English Proficient (LEP) populations. VVTA is a recipient of federal funding and, pursuant to Federal Transit Administration (FTA) Title VI regulatory guidance, should seek and consider viewpoints of minority, low income and LEP populations in the course of conducting public outreach and involvement activities." (FTA Circular 4702.1A) Additionally, VVTA as the funding recipient will offer "early and continuous opportunities for the public to be involved in the identification of social, economic and environmental impacts of proposed transportation decisions at VVTA.

VVTA may modify its public participation methods over time based on feedback from the low income, minority and LEP populations, including customer- and community-based organizations. The Plan is a living document that may be updated periodically to reflect community preferences, changing demographics and transit services, as well as respond to new communication and outreach methods.

### GOALS

VVTA seeks to provide meaningful opportunities for the public to assist staff in identifying social, economic, and environmental impacts of proposed transportation decisions. This includes input from low income, minority, and limited English proficient populations.

#### Specific goals and outcomes include:

- **Quality Input and Participation:** Comments received by VVTA are useful, relevant, and constructive, contributing to better plans, projects, strategies, and decisions.
- **Consistent Commitment:** VVTA communicates regularly, develops trust with communities and builds community capacity to provide public input.
- **Diversity:** Participants represent a range of socioeconomic, ethnic, and cultural perspectives, with representative participants including residents from low-income neighborhoods, ethnic communities, and residents with Limited English Proficiency.
- **Accessibility:** Effort is made to ensure that opportunities to participate are accessible physically, geographically, linguistically, and culturally.
- **Relevance:** Issues are framed in such a way that the significance and potential effect is understood by participants.
- **Participant Satisfaction:** People who take the time to participate should feel it is worth the effort to join the discussion and provide feedback.
- **Clarity in Potential for Influence:** The process clearly identifies and communicates where and how participants can have influence and direct impact on decision-making.

### PRINCIPLES

VVTA's Public Participation Plan is aimed at assuring and improving access to VVTA's decision-making by the whole population of the High Desert, with emphasis on minority and Limited English Proficient (LEP) populations. VVTA looked into the preferred methods by minority and LEP populations for being engaged in

VVTA's decision-making process. Though their differences were minimal, some different preferences among populations did emerge.

**Effective public participation should be based on the following principles:**

- **Flexible:** The engagement process should accommodate participation in a variety of ways and be adjusted as needed.
- **Inclusive:** VVTA should proactively reach out and engage low income, minority and LEP populations from the VVTA service area so these groups will have an opportunity to participate.
- **Respectful:** All feedback received should be given careful and respectful consideration.
- **Tailored:** VVTA's public participation methods should be tailored to match local and cultural preferences as much as possible.
- **Proactive and Timely:** Participation methods should allow for early involvement and be ongoing and proactive, so participants can influence decisions.
- **Clear, Focused and Understandable:** Participation methods should have a clear purpose and use for the input and should be described in language that is easy to understand.
- **Trustworthy:** Information provided should be accurate and trustworthy.
- **Responsive:** VVTA should strive to respond and incorporate appropriate public comments into transportation decisions.
- **Transparent in Impact:** VVTA should communicate the results of the public's input in terms of the impact on decisions at a broad summary level, providing the major themes, the decisions reached and rationale for the decisions.
- **Authentic and Meaningful:** VVTA should support public participation as a dynamic and meaningful activity that requires teamwork and commitment at all levels of the organization.

## OUTREACH PLAN

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### LEVELS OF SERVICE

Through consultation with minority and the Limited English Proficiency populations, VVTA informal surveys identified that the preferences of these groups are similar to those of the general public – including how they receive information about changes to VVTA services, when they prefer to attend VVTA meetings, and the best locations for those VVTA meetings. Any minor differences are best mitigated by assuring that public participation includes an array of alternatives that appeal to all groups. For example, information on service changes should be shared with the public through promotional placards on-board the bus and Infotainment screens inside buses, and by digital means via email and social media; meetings should be held not only in the mornings but also early afternoons, late afternoons, and early evenings; meetings should be held at locations in Hesperia as well as regional locations such rural branch libraries. A strategy for specific participation with these groups includes the following guidelines:

#### Minority

- VVTA riders who are Minorities are best reached with information on VVTA's website and on-board newsletters.
- Meeting times in the mid-to late afternoon are preferred by minority riders.
- Minority riders prefer meeting while using the system at key transfer points or while on buses.

#### Limited English Proficiency

- VVTA riders with Limited English Proficiency are best reached with information via on-bus newsletters and VVTA's website.
- Meeting times in the mid-to late afternoon are acceptable for LEP riders.
- LEP riders do not appear to have a meeting location preference.

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### DIRECT COMMUNICATIONS

The Public Participation Plan identifies a variety of methods for disseminating information to the public. While aimed at the general public, they are important tools in reaching minority and LEP populations, which identified these tools as the chosen means of receiving relevant information. These communication methods are typically offered in English and Spanish. All methods are available for translation or interpretation upon request. These may include:

- **On-Board Audio Announcements:** VVTA's Automatic Vehicle Location System has the capability of scheduling automatic audio announcements on VVTA buses. These announcements can be scheduled on all routes, or single routes, and can be triggered by location on route or on regularly timed intervals.
- **Ads on Buses & Bus Shelters:** Overhead car card advertisements can be posted inside VVTA's buses. Buses include Infotainment screens that broadcast passenger information.
- **Posters at Key VVTA Locations:** VVTA Headquarters Customer Service Window.
- **Emails to Partners:** These electronic communications can be sent directly to community partner organizations through the VVTA email marketing service. Similar to mailers, these can include letters to key staff members at these locations, as well as promotional posters and announcements for them to distribute.

- **Messages through VVTA Phone App (customers):** These electronic communications are distributed through the VVTA smartphone app provided by Syncromatics. Customers can sign up through the VVTA text messaging service or the VVTA website to receive alerts and news from VVTA on routes of interest to them. They can select to receive emails about individual routes, media releases, et cetera. VVTA staff has the flexibility to target email communications to subgroups of VVTA ridership, such as those on a particular route. VVTA staff can also elect to send messages to all VVTA customers.
- **Media Releases:** Media releases are aimed at generating news coverage of VVTA events, changes, meetings, et cetera. They are distributed electronically via VVTA's media email list, as well as posted on the News and Media page of VVTA's website.
- **Community Newsletters:** VVTA has several partners in the community that publish newsletters, including several member governments. VVTA can provide articles to these partners for publication in their newsletters.
- **Partner Websites:** Like community newsletters, VVTA's many community partners maintain websites that are frequented by the public. VVTA can provide information to these partners to be included on their websites.
- **Community Calendars:** One feature that is common to many of VVTA's partners' websites is a calendar. VVTA can share the times and dates of key meetings or events with the partners for inclusion on these calendars.
- **Public Notices:** These are published in the daily newspaper of record, The Press Enterprise, as well as the San Bernardino American, and El Chicano. Public Notices are also posted on VVTA's website.
- **VVTA Website:** VVTA's website, VVTA.org, is one of the primary sources of information for VVTA riders. Several tools are available within the site to communicate changes in service as well as to notify the public of opportunities to participate in VVTA's decision-making process. These include "news items" that appear as short summaries on the home page and, when selected, can lead to longer news items, including meeting schedules and links to route maps, surveys, et cetera.
- **VVTA Facebook Page:** VVTA's Facebook page is used by staff to interact with riders and can be leveraged to push out information regarding service changes and opportunities for the public to participate in VVTA's decision making process.
- **VVTA Instagram Page:** VVTA's Instagram page is used by staff to interact with riders through image-based marketing to share information regarding service changes and opportunities for the public.
- **VVTA LinkedIn Page:** VVTA's LinkedIn page is used by staff to interact with community partners and industry professionals on the latest news and information from VVTA.
- **VVTA Twitter feed** – VVTA's Twitter account allows staff to share newsworthy items with riders, including service changes and opportunities for the public to participate in VVTA's decision-making process.
- **VVTA YouTube Page:** VVTA's YouTube page, allows for video to share information on VVTA both internally and externally.
- **VVTA TikTok Page:** A newer venture in social media for VVTA, this platform allows the Agency the opportunity to reach out to a younger demographic.

## METHODS OF INVOLVING THE PUBLIC

Similarly, the Public Participation Plan includes a menu of available methods for involving public participation in VVTA's decision-making process. Again, these are important means of engaging minority and LEP populations as well as the general public. These may include:

- **Public Hearings** – A public hearing is required by federal or state regulations where comments from the public go into the public record. A public hearing is governed by rules concerning who speaks when and for how long and is overseen by a VVTA official. A public hearing is NOT a question-and-answer format.
- **Opportunity for Public Comment** – An Opportunity for Public Comment is a solicitation for public input on a specific subject over a specified duration of time. VVTA may offer these by advertising them as it would a Public Hearing.
- **Surveys** – Surveys are a series of specific questions, often in multiple-choice format that can be distributed in print form as well as in digital form. The results from surveys can be quantified and analyzed, but are not as conducive to broader, more open-ended discussions.
- **Public Comment Cards** – Public Comment cards are open-ended questionnaires that can be distributed in printed form as well as in digital form. Comments from these cards are valuable for open-ended discussions, although they are not as easy to quantify or analyze.
- **General Comments** – VVTA is always open to and accepting of public comments, Comments can be shared with VVTA by phone at (760) 948-3030, by email at [Info@VVTA.org](mailto:Info@VVTA.org), or by regular mail at 17150 Smoke Tree Street, Hesperia, CA 92345.

## OUTREACH EFFORTS

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### LEP AND MINORITY POPULATIONS

VVTA's outreach to LEP and minority populations for its long-range planning and major service changes include the following activities: VVTA schedules at least one public meeting during third and/or fourth quarter annually to collect public input on regional transit needs in each of the primary service area locations: Adelanto, Barstow, Apple Valley, Hesperia, Victorville, Phelan, Lucerne Valley, Helendale, Daggett, Hinkley, Piñon Hills, and Wrightwood.

Additionally, VVTA Marketing, CTSA, and Brokerage staff engage LEP and minority populations through efforts San Bernardino County Municipal Advisory Council (MAC) meetings for all areas through the VVTA service area, Public and Specialized Transportation Advisory and Coordination Council (PASTACC), High Desert Hispanic Chamber of Commerce, Interagency Council on Homelessness, local and regional senior centers, Homelessness Provider Network, Veterans of Foreign War posts, San Bernardino Senior Affairs Commission, San Bernardino County Department of Aging and Adult Services, Family Preparedness Fairs, local Health Centers,, Family Resource Centers, Desert/Mountain Special Education Local Plan Area (SELPA), Inland Empire and High Desert Resource Network, High Desert Hispanic Chamber of Commerce Cinco de Mayo Festival, Victor Valley College, San Bernardino County West Valley Homeless Partnership Network, and public events.

Such public meetings and engagement opportunities are accessible via public transit and serve to collect public feedback and recommendations in drafting the long-range planning document.

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### TRANSLATION & INTERPRETIVE SERVICES

VVTA's program for providing translation and interpretive services is critical to the success of the Public Participation Plan in reaching minority and LEP populations. These translation and interpretive services are provided by request to members of the public, according to their needs. These needs are served through fluent staff and contractors that are on call for this purpose.

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### PARTNERS

VVTA utilizes a network of community partners to reach minority and LEP populations. These partnerships are a valuable resource, helping VVTA to identify and best serve the evolving needs of its LEP populations. The benefits of this strategy include:

- VVTA can “amplify” its messages by routing them through partners’ communication networks, thereby reaching more of the minority and LEP populations. These messages include:
  - Relating valuable information, and
  - Providing opportunities to participate in VVTA’s decision-making process.
- VVTA can consult with these partners’ staff and clients on:
  - Transportation needs, and
  - Solutions to perceived and/or real issues.

## Community Partners

- Foothill Aids Project
- Women of Noble Character
- Barstow Dignity Station
- Benjamin E Jones Community Resource Center
- Another Level for Women
- New Hope Village
- The Gate Church of the High Desert
- Rolling Start
- Family Assistance Program
- Mirus Secondary School
- Barstow Senior Center
- High Desert Homeless Shelter
- Moses House Ministries
- Victor Valley Community Services Council
- Adelanto Senior Center
- Desert Communities United Way
- ESP/CalWORKs – Victorville
- ESP/CalWORKs
- Department of Aging and Adult Services
- Public and Specialized Transportation Advisory and Coordination Council (PASTACC),
- Senior Centers (for all service areas)
- Homelessness Provider Network
- Family Preparedness Fairs
- Health Centers (for all service areas)
- Family Resource Centers
- Desert/Mountain Special Education Local Plan Area (SELPA)
- Victor Valley College
- St. Mary's Medical Center
- Church for the Whosoever

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## PUBLIC PARTICIPATION

To integrate, into community outreach activities, considerations expressed in the DOT Order on Environmental Justice, and the DOT LEP Guidance, VVTA seeks out and considers the viewpoints of minority, low-income, and LEP populations while conducting public outreach and involvement activities. VVTA's public participation strategy offers early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions. These may include:

- Coordinating with individuals, institutions, or organizations and implementing community-based public involvement strategies to reach out to members in the affected minority and/or low-income communities.
- Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.
- Using locations, facilities, and meeting times that are convenient and accessible to low-income and minority communities.
- Using different meeting sizes, formats, or varying the type and number of news media used to announce public participation opportunities, so that communications are tailored to the specific community or population.
- Implementing DOT's policy guidance concerning recipients' responsibilities to LEP persons to overcome barriers to public participation.

Public outreach was conducted for the COA to gather participant information on preliminary service alternatives and route modifications for routes most frequented and asked for feedback. The table below indicates the public outreach events conducted in April 2024.

## PUBLIC OUTREACH EVENTS FOR VVTA COMPREHENSIVE OPERATIONAL ANALYSIS – APRIL 2024

Community Events	<p><b>High Desert Cancer Connection</b> Saturday, April 13, 2024, 10am - 3pm</p> <p><b>Hesperia Farmers Market</b> Saturday, April 13, 10am – 3pm</p> <p><b>High Desert Farmers Market</b> Thursday, April 18, 8am – 12pm</p>
Virtual Drop-In Hour	<p><b>Virtual (Zoom) Drop In Session</b> [Tuesday, April 16, 6 – 7pm]</p>
Pop-Up Sessions	<p><b>Hesperia Post Office</b> [Monday, April 15, 9:30 – 11am]</p> <p><b>Main/Cataba Stop (SuperTarget)</b> [Monday, April 15, 11:30 am – 1pm]</p> <p><b>Victor Valley College (main bus stop)</b> [Monday, April 15, 2:30 – 4pm]</p> <p><b>Victor Valley Transportation Center</b> [Tuesday, April 16, 11:30 am – 1pm]</p> <p><b>Carl's Jr. Bus Stop in Adelanto</b> [Tuesday, April 16, 2:30 – 4pm ]</p> <p><b>Apple Valley Post Office</b> [Tuesday, April 16, 2:30 – 4pm]</p> <p><b>Barstow City Hall</b> [Wednesday, April 17, 2:30 – 4pm]</p>



## APPENDIX A

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### Appropriate Resources for VVTA & Keolis to Access

**“Breaking Down the Language Barrier: Translating Limited English Proficiency into Practice.”** This video, which is available on DVD and as a streaming video link on <http://www.lep.gov/>, explains the language access requirements of Title VI and Executive Order 13166 through vignettes that expose the problems resulting from the absence of language assistance. The video goes on to show how these same situations could have been handled more appropriately if the service provider took reasonable steps to provide meaningful access.

**“Providing Language Access for Persons with Limited English Proficiency,”** a PowerPoint presentation produced by the FTA Office of Civil Rights and available at [http://www.fta.dot.gov/civilrights/title6/civil\\_rights\\_5102.html](http://www.fta.dot.gov/civilrights/title6/civil_rights_5102.html).

**“How to Engage Low-Literacy and Limited English Proficient Populations in Transportation Decision-making,”** available at <http://www.fhwa.dot.gov/hep/lowlim>. This report documents “best practices” in identifying and engaging low-literacy and LEP populations in transportation decision-making. These “best practices” were collected during telephone interviews with individuals in 30 States.

**“Basic Spanish for Transit Employees”** this flip guide was produced by the Roaring Fork Transit Authority and the Colorado Mountain College. It includes requests and commands that vehicle operators use every day in English and in Spanish and written phonetically in English. Copies of this guide can be obtained by calling 970-945-8691.

**“Guidelines for Developing Traffic Safety Educational Materials for Spanish-Speaking Audiences,”** a manual developed by the Education in Traffic Safety project, Education Development Center, Inc., with funding from the National Highway Traffic Safety Administration. The manual is organized into three sections: research and planning, creating materials, and dissemination and evaluation. Available at <http://www.nhtsa.dot.gov/people/injury/airbags/TESM/index.htm>.

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## **APPENDIX B**

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### **Description of All Pending Applications**

As of June 3, 2024, there are no federally assisted grant programs pending approval, other than FTA grant programs, by the Victor Valley Transit Authority. The person or persons whose signature(s) appear below is/are authorized to sign this assurance on behalf of the grant applicant or recipient.

\_\_\_\_\_  
Nancie Goff  
CEO  
VVTA

\_\_\_\_\_  
Date

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## APPENDIX C

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### FTA Civil Rights Assurance

The Victor Valley Transit Authority hereby certifies that, as a condition of receiving Federal financial assistance under the Urban Mass Transportation Act of 1964, as amended, it will ensure that:

1. No person on the basis of race, color, or national origin will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.
2. The Victor Valley Transit Authority will compile, maintain, and submit in a timely manner Title VI information required by FTA Circular 4702.1 and in compliance with the Department of Transportation's Title VI regulation, 49 CFR part 21.9.
3. The Victor Valley Transit Authority will make it known to the public that those persons or person alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

The person or persons whose signature(s) appear below is/are authorized to sign this assurance on behalf of the grant applicant or recipient.

\_\_\_\_\_  
Nancie Goff  
CEO  
VVTA

\_\_\_\_\_  
Date

## APPENDIX D

The following VVTA Rider Profile is derived from the most recent VVTA Comprehensive Operational Analysis Passenger Survey, which was conducted in October 2023.

### Rider Profile



**42%** of riders travel to and from their homes



**39%** of riders use a Day Pass as their main payment method

**57%** of riders pay a discounted fare



**19%** of riders travel to work



**30%** of riders get scheduling information from using a mobile app



**60%** of riders must use more than one bus to make their trip

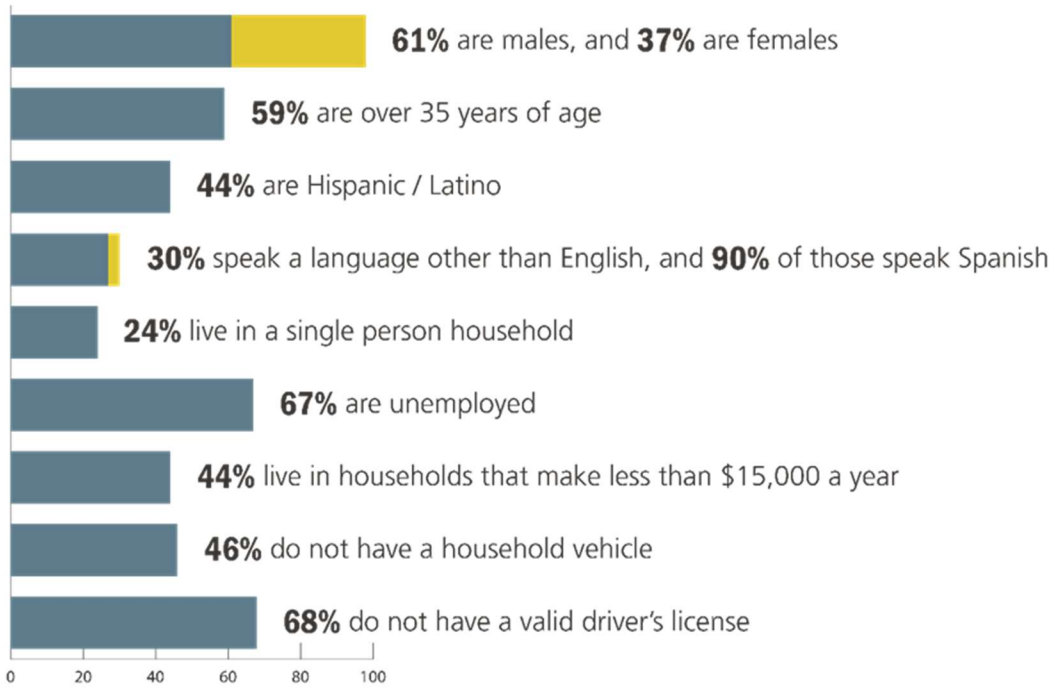


**90%** of riders walk from their origin to their first bus



**48%** of passengers ride VVTA at least five days a week

## Passenger Profile



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## APPENDIX E

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### CIVIL RIGHTS INFORMATION

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#### Basic Requirement

VVTA ensures that no person in the United States shall on the grounds of race, color, creed, national origin, sex, or age be excluded from participating in, be denied the benefits of, or be subject to discrimination under any project, program, or activity funded in whole or in part through financial assistance under the Federal Transit Act, as amended. The provisions of this section apply to service delivery, employment, and business opportunities and are considered to be in addition to, and not in lieu of, the provision of Title VI of the Civil Rights Act of 1964.

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#### Description

VVTA has designated the Procurement Specialist Civil Rights Coordinator as the staff person responsible for Title VI and Equal Employment Opportunity (EEO) on a collateral basis, this position reports to the Chief Executive Officer (CEO).

VVTA submitted a Title VI program assurance which was approved by FTA. VVTA reviews census data and routes to ensure that service is provided fairly and equitably. The level and quality of service is monitored semi-annually during route analyses and passenger surveys.

VVTA submitted an EEO program assurance to FTA which was approved by the VVTA Board. VVTA's contractor Keolis maintains an up-to-date workforce utilization data by race, sex, job category, and department. Each time a change in personnel occurs, their Human Resources Coordinator updates the list. Responses to advertised positions are monitored and tabulated in an effort to determine the effectiveness of the hiring initiatives.

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#### Disadvantaged Business Enterprise (DBE)

The Disadvantaged Business Enterprise (DBE) officer for VVTA is the Procurement Manger. VVTA has an FTA-approved race neutral DBE program.

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#### Equal Employment Opportunity (EEO)

VVTA maintains an effective complaint system for handling EEO, Americans with Disabilities Act, Title VI, DBE, and other discrimination complaints. All civil rights complaints from passengers are documented and investigated immediately by supervisory personnel. Complaints from employees are handled in accordance with the VVTA problem resolution policies contained in the employee handbook. The policies state that all complaint processing and completion must occur in a timely manner, and within a specified period of time. Employees have 30 days to submit a written complaint and VVTA has 30 days to resolve the complaint. VVTA is in compliance with the basic requirements for Civil Rights.

## APPENDIX F

### Samples of Translated Materials

**UMO ES LA MANERA PERFECTA DE VIAJAR CON VVTA!**

Pague con UMO, con la aplicación o la tarjeta inteligente:

- ✓ Embarque sin contacto
- ✓ Cargue previamente sus tarifas
- ✓ Planificación de viajes con opciones \*
- ✓ Seguimiento del autobús GPS en vivo \*
- ✓ ¡Deja comentarios y más! \*

\*Solo disponible en la aplicación.

**Descargue Hoy la Aplicación "UMO Mobility"**



VICTOR VALLEY TRANSIT

Available on the App Store and Google Play.


**Aviso: Verano de Alto Calor**

Debido a alto calor y la apertura y cierre de las puertas, la temperatura dentro de los vehículos es generalmente 20 grados más fría que la temperatura exterior del aire. Los sistemas de aire acondicionado utilizados en todos los vehículos de tránsito VVTA son los mejores disponibles en la industria y son mantenidos continuamente para su comodidad.

Durante los meses de altas temperaturas este verano, mantenga las ventanas cerradas, a menos que sea absolutamente necesario.

Para obtener más información, llame al (760) 948-4021.

**VICTOR VALLEY TRANSIT**



**TRABAJANDO JUNTOS PARA NUESTROS PASAJEROS**

Una nueva asociación entre VICTOR VALLEY TRANSIT y el Sheriff's Department.

Presentamos el Departamento del Sheriff Equipo de Victor Valley Transit

**VIAJES SEGUROS VVTA**

Obtenga más información en [vvta.org/saferides](http://vvta.org/saferides)




Victor Valley Transit Authority

**iVANPOOL.ORG**

**Únete hoy VANPOOL!**

- Gasta Menos en Gasolina
- Pasa Menos Tiempo en la Carretera
- Menos Desgaste en Su Vehículo
- Reducir la Congestión en la Autopista
- Disfrute su viaje
- Llegar con mejor ánimo

**iVanpool.org**






# APPENDIX G

## “I Speak” Language Identification Card

I Speak...

Language Identification Guide

**A**

**Amharic**  
አኔ አማራጅ ነው ምናረው.

**Arabic**  
أنا أتحدث اللغة العربية

**Armenian**  
Ես խոսում եմ հայերենի

---

**B**

**Bengali**  
আমি বাংলা কথা বলতে পারি

**Bosnian**  
Ja govorim bosanski

**Bulgarian**  
Аз говоря български

**Burmese**  
ကျွန်တော်/ကျွန်းမ ကို မြန်မာလို မြေတတ်ပါတယ်။

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**C**

**Cambodian**  
ខ្ញុំនិយាយភាសាខ្មែរ

**Cantonese**  
我講廣東話 (Traditional)  
我讲广东话 (Simplified)

**Catalan**  
Parlo català

**Croatian**  
Govorim hrvatski

**Czech**  
Mluvim česky

---

**D**

**Danish**  
Jeg taler dansk

**Dari**  
من دری حرف می زنم

**Dutch**  
Ik spreek het Nederlands

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**E**

**Estonian**  
Ma räägin eesti keelt

---

**F**

**Finnish**  
Puhun suomea

**French**  
Je parle français

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**G**

**German**  
Ich spreche Deutsch

**Greek**  
Μιλώ τα ελληνικά

**Gujarati**  
હું ગુજરાતી બોલું છું

---

**H**

**Haitian Creole**  
M pale kreyòl ayisyen

**Hebrew**  
אני מדבר עברית

**Hindi**  
मैं हिंदी बोलता हूँ।

**Hmong**  
Kuv has lug Moob

**Hungarian**  
Beszélék magyarul

**I**

**Icelandic**  
Ég tala íslensku

**Ilocano**  
Agsanak ti Ilokano

**Indonesian**  
saya bisa berbahasa Indonesia

**Italian**  
Parlo italiano

---

**J**

**Japanese**  
私は日本語を話す

---

**K**

**Kackchiquel**  
Quin cha güic'ká chábal ruin ri

**Korean**  
한국어 합니다

**Kurdish**  
man kurdîi zaanim

**Kurmanci**  
man Kurmanjîi zaanim

---

**L**

**Latvian**  
Es runāju latviski

**Lithuanian**  
Aš kalbu lietuviškai

**Q**

**Qanjolal**  
Ayin ti chí wal q' anjob' al

**Quiche**  
In kinch'aw k'uin ch'e quiche

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**R**

**Romanian**  
Vorbesc românește

**Russian**  
Я говорю по-русски

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**S**

**Serbian**  
Ja govorim српски

**Sign Language**  


**Slovak**  
Hovorim po slovensky

**Slovenian**  
Govorim slovensko

**Somali**  
Waxaan ku hadlaa af-Soomaali

**Spanish**  
Yo hablo español

**Swahili**  
Ninaongea Kiswahili

**Swedish**  
Jag talar svenska

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**T**

**Tagalog**  
Marunong akong mag-Tagalog

**Tamil**  
நான் தமிழ் பேசுவேன்

**Thai**  
พูดภาษาไทย

**Turkish**  
Türkçe konuşurum

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**U**

**Ukrainian**  
Я розмовляю українською мовою

**Urdu**  
میں اردو بولتا ہوں

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**V**

**Vietnamese**  
Tôi nói tiếng Việt

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**W**

**Welsh**  
Dwi'n siarad

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**X**

**Xhosa**  
Nditheha isiXhosa

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**Y**

**Yiddish**  
איך רעד יידיש

**Yoruba**  
Mo nso Yooba

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**Z**

**Zulu**  
Ngiyasiluhluma isiZulu

Executive Order 13166 requires DHS to take reasonable steps to provide meaningful access to its programs and activities for persons with limited English proficiency and - as also required by Title VI of the Civil Rights Act of 1964 - to ensure that recipients of federal financial assistance do the same.

**I** Speak is provided by the Department of Homeland Security Office for Civil Rights and Civil Liberties (CRCL). Special thanks to the Department of Justice Bureau of Justice Assistance and the Ohio Office of Criminal Justice Services, for inspiration and permission to use their “I Speak” guide as the initial source.

Contact the DHS Office for Civil Rights and Civil Liberties at [CRCLTraining@dhs.gov](mailto:CRCLTraining@dhs.gov) for digital copies of this poster or a “I Speak” booklet. Other resources at [www.lep.gov](http://www.lep.gov).

Download copies of the DHS LEP plan and guidance to recipients of financial assistance at [www.dhs.gov/crcl](http://www.dhs.gov/crcl)



**Homeland Security**



**APPENDIX H**

**List of Transit-Related Title VI Investigations, Lawsuits and Complaints  
Since Last Program Submittal in 2021**

Type	Date	Summary	Status	Action(s) Taken
Investigations	N/A	N/A	N/A	N/A
Lawsuits	N/A	N/A	N/A	N/A
Complaints				
1	Sept. 8, 2021	The complainant called VVTA and indicated that taxi service is needed for the Needles community.	Investigation found complaint to be not valid for Title VI	Sent Closeout Letter
2	May 8, 2024	The complainant alleges VVTA racially discriminated by providing other non-Black passengers better care and respect after she was involved in a fall from her wheelchair onboard a bus.	Under Investigation	Letter Response to be Sent After Completion of Investigation

## APPENDIX I

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### Barstow Facility Title VI Report and Conditional Use Permit from the City of Barstow

## Barstow O&M Facility Title VI Analysis

This Title VI analysis documents the processes involved in the section, design, and construction of Victor Valley Transit Authority (VVTA)'s new Operations and Maintenance (O&M) Facility. It analyzes the retroactive disparate impact or disproportionate burden on the Title VI population defined by race, and income. Lastly, the next steps are outlined to help VVTA document that proper procedures were followed to select and construct the Barstow O&M facility and Title VI principles were adhered to.

### Introduction

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VVTA is a transit agency providing a suite of transit services including fixed route service, intercity service, commuter service, microtransit, paratransit service, and vanpool service in the Victor Valley, California area. The services are being provided to the cities of Adelanto, Apple Valley, Hesperia, Victorville, and portions of San Bernardino County, including Lucerne Valley, Phelan, Wrightwood, Piñon Hills, Oro Grande, and Helendale. The VVTA fleet includes 68 fixed-route buses, 40 ADA direct access paratransit vehicles, 8 commuter buses, 5 Micro-Link vehicles as well as 26 support vehicles.

Prior to the construction of the Barstow O&M Facility located at 2641 W. Main Street in Barstow (see **Figure 2**), vehicles were housed at a facility in east Barstow located at 1612 State Street. The east Barstow facility was leased, lacked a maintenance shop, did not support the growing fleet and staff size, and was located six miles away from the Compressed Natural Gas (CNG) fueling stations causing over 100 miles daily in deadhead just to fuel vehicles. A new facility would support current and future expansion, meeting the region's growing transit needs, while reducing costs through on-site maintenance and reducing deadhead mileage for fueling. Owning instead of leasing a facility would allow for the introduction of zero-emission vehicles to the fleet and necessary charging/fueling infrastructure, thus promoting the agencies' mission to improve sustainability and reduce their carbon footprint.

In 2016, a Phase 1 Environmental Site Assessment (ESA) was completed for the proposed facility site located at the northwest corner of Sandstone Court and National Trails Highway in Barstow, California. A Phase 1 ESA relates only to the requirements of the Comprehensive Environmental Review, Compensation and Liability Act (CERCLA, commonly known as Superfund), which pertains to hazardous substances. A Phase 1 ESA addresses only a small part of what is required for an overall NEPA EA and would not fully meet the requirements of a NEPA Environmental Assessment (EA). A NEPA EA is a comprehensive study that identifies environmental impacts of a land development action and analyzes a broad set of parameters including biodiversity, environmental justice, wetlands, air and water pollution, traffic, geotechnical risks, public safety issues and hazardous substance issues. A NEPA EA was not prepared by VVTA.

After the completion of Phase 1 ESA, the assessment revealed no evidence of current (as of June 2016) or historic recognized environmental conditions (RECs) or Controlled RECs in connection with the subject property on Main Street. The facility was then identified as a capital project in VVTA's annual operating and capital budget for fiscal year 2018-2019. The building of the 9,998 sq. ft. facility was designed by MZT Architects and Building Designers. Construction

began in July 2019, with doors officially opening on August 11, 2020. The facility and site needs from the agency are listed below:

- Less than six miles from the current CNG fueling center
- Appropriately zoned
- Vacant lot
- Lot size 5.5 acres or greater
- Compatible surrounding land uses
- Site lacks environmental hazards
- Site has easy access to existing utilities (electricity, water, gas, sewer)

## Requirements and Guidance

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Title VI of the Civil Rights Act of 1964 (Title VI) provides 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.” See 42 U.S.C. § 2000d.

FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients (2012), requires an equity analysis to ensure that the location of a maintenance, storage, or operation facility is selected without regard to race, color, or national origin. Title 49 of the Code of Federal Regulations (C.F.R.) Section 21.9(b)(3) states, “In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part.”

Title 49 C.F.R. Part 21, Appendix C, Section (3)(iv) provides, “The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.”

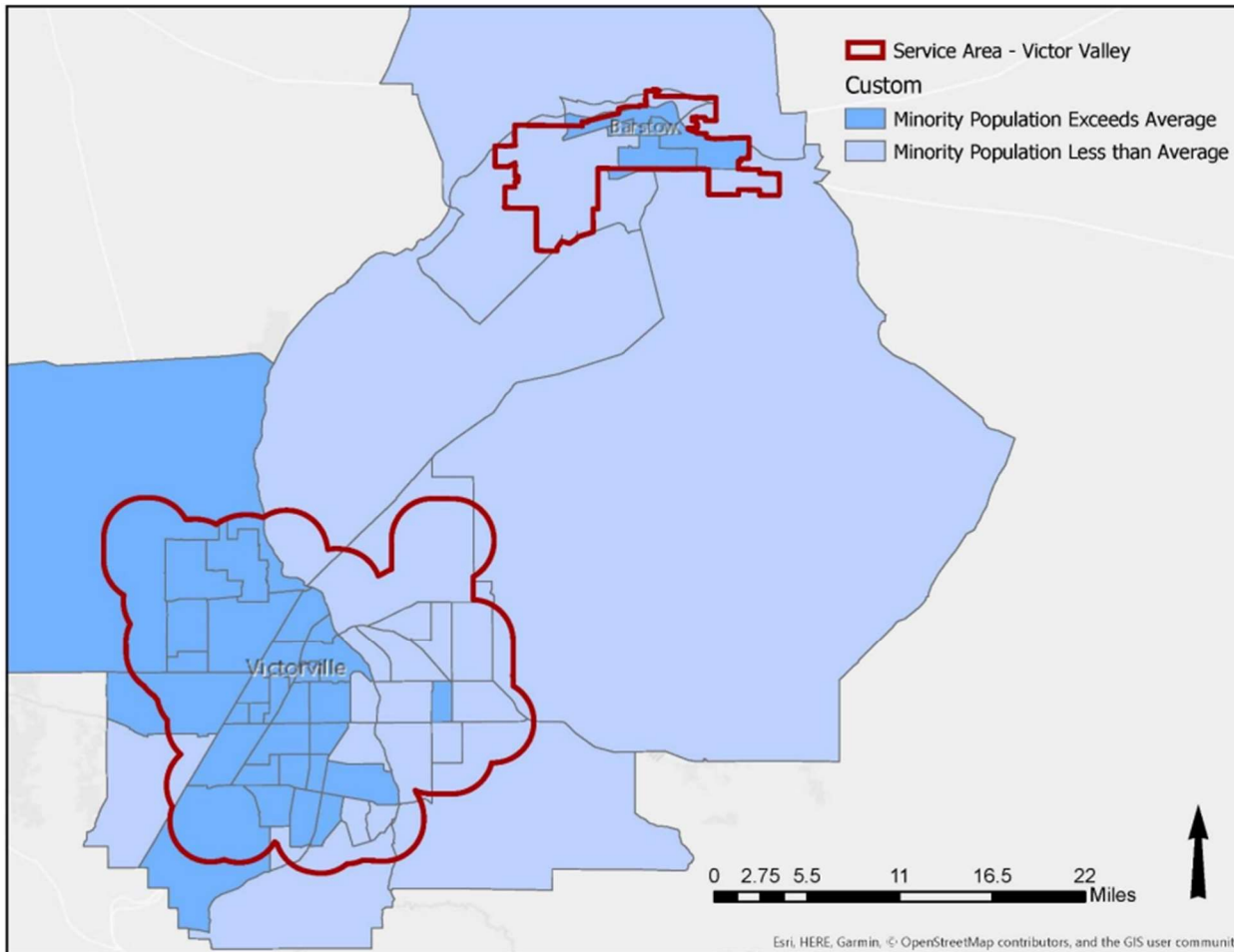
VVTA is committed to ensuring that no person is excluded from participation in or denied the benefits of its transit services based on race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B. Per FTA guidelines, VVTA’s Title VI Program<sup>1</sup> defines service area, minority population, and low-income population as:

- Service area is shown in **Figure 1** below. In this Title VI analysis, the City of Barstow is used as the service area of VVTA in this jurisdiction because the services from this division are Barstow services and planning pre-dates the merger.

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<sup>1</sup> [https://vvta.org/wp-content/uploads/2019/03/VVTA\\_TITLE-VI\\_PROGRAM\\_2019-2021\\_BA\\_20180803.pdf](https://vvta.org/wp-content/uploads/2019/03/VVTA_TITLE-VI_PROGRAM_2019-2021_BA_20180803.pdf)

Figure 1. VVTA Service Area



Source: [https://vvta.org/wp-content/uploads/2019/03/VVTA\\_TITLE-VI\\_PROGRAM\\_2019-2021\\_BA\\_20180803.pdf](https://vvta.org/wp-content/uploads/2019/03/VVTA_TITLE-VI_PROGRAM_2019-2021_BA_20180803.pdf)

- Census tracts, blocks, or block groups where the total minority population residing in these areas exceeds the average percentage of minority population for the service area.
- Within the VVTA Service Area, the percentage of low-income population does not meet or exceed the threshold reported by federal sources

The purpose of this fixed facility analysis is to assess the equity impacts of the Project evaluated to demonstrate that the site selection of the Barstow O&M facility did not result in a disparate impact based on race, color, or national origin. The site was vacant aside from the VVTA CNG fueling station. Given that the project was not displacing people or businesses and was on a site that was partially vacant and partially already developed by VVTA a Title VI Analysis was not conducted for site election at the time.

Considering that the site was chosen, and the facility was constructed between 2019 and 2020, the purpose of this facility Title VI analysis is to assess the equity impacts of the Project to determine if that the site selection of the Barstow O&M facility resulted in a disparate impact or disproportionate burden.

## Background

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The Barstow O&M Facility is currently located at 2641 W. Main Street in Barstow near Main Street and California State Route 58 (see **Figure 2**). The Barstow O&M Facility aims to support the operations and maintenance of services that address the increasing demands of riders and enhance accessibility to employment, educational institutions, healthcare services, and shopping opportunities. In addition, the Barstow O&M Facility is adjacent to the Liquefied Compressed Natural Gas (LCNG) and gas station, making it easier and quicker to fuel CNG and gasoline operated vehicles cutting approximately 38,880 unnecessary miles annually when operators refueled at the previous Barstow refueling facility. The facility has been authorized to participate in the Southern California Edison (SCE) Charge Ready Transport Program, enabling significant cost savings and facilitating the future integration of zero-emission battery-electric buses into the Barstow fleet operated by VVTA.

The site is in the Mojave Desert, which is characterized as flat and desert-like with sparse low growth shrub like vegetation. Zoned as “Diverse Use” (DU), the purpose of the zone is to encourage a harmonious intermingling of business and residential structures. The site is surrounded on two sides by undeveloped DU-zoned parcels. Opposite the site on W Man Street is a mix of DU and single-family residential zoning. As shown in **Figure 2**, the closest parcel zoned as residential to the Barstow O&M Facility is located 700 feet to the southeast. On the north side of the site is the BNSF rail yard, zoned industrial. Any use permitted in the commercial, single family residential, and low density residential are allowed by right. A bus O&M facility classifies as a “truck repair and service center” and would require a conditional use permit.

# VICTOR VALLEY TRANSIT

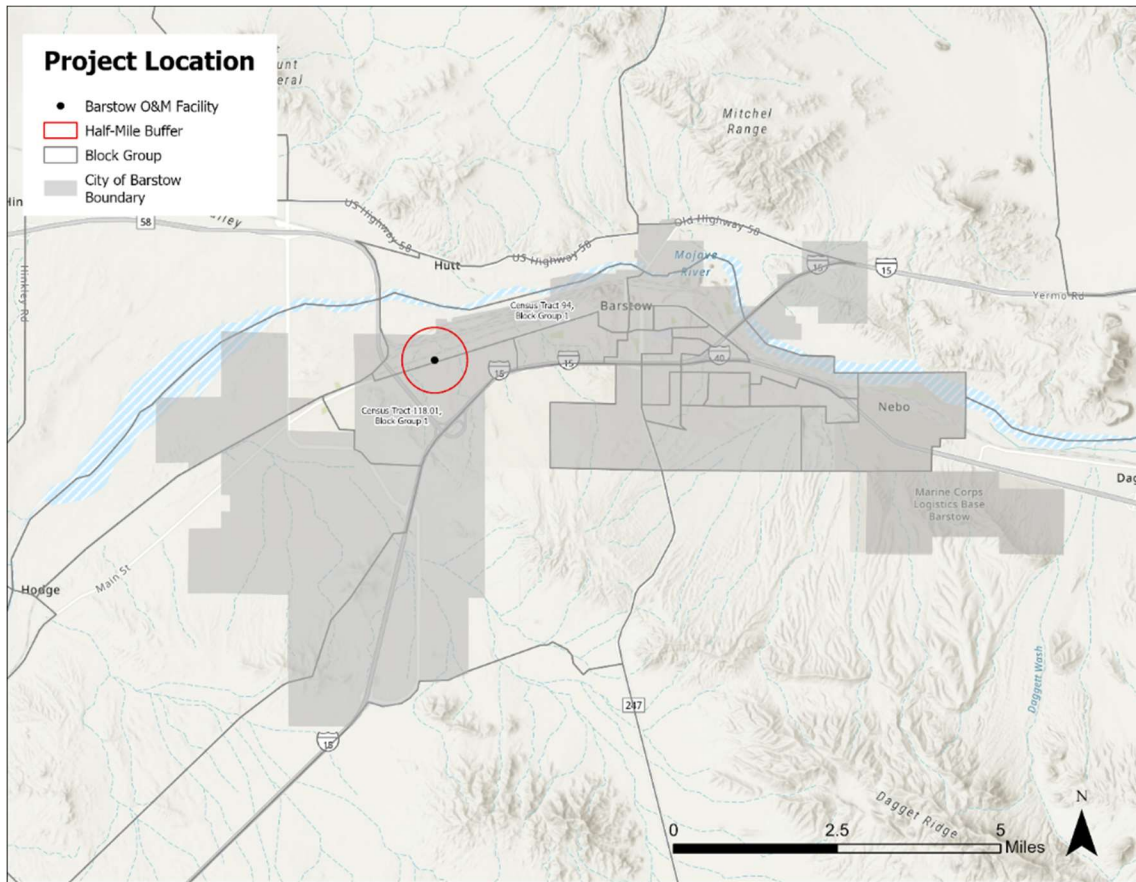
Figure 2. Zoning Map



Source: AECOM 2024; City of Barstow Zoning Map 2015; U.S. Census Bureau, TIGER/Line Shapefile, Nation, U.S., Census Block Groups 2020.



Figure 3. Project Location



Source: AECOM 2024; U.S. Census Bureau, TIGER/Line Shapefile, Nation, U.S., Census Block Groups 2020.

## Phase 1 Environmental Site Assessment Report Summary

In 2016, a Phase 1 ESA was completed for the Barstow O&M Facility site, located at the northwest corner of Sandstone Court and National Trails Highway in Barstow, California.

The site is located on approximately 6.65 acres of property. The majority (5.58 acres) of the property was vacant, and the Barstow CNG Fuel Station (operated by the Victor Valley Transit Authority) occupies the remaining 1.07 acres. Previous records indicate that while the site was vacant and undeveloped through 1995, by 2005, the site was developed to its current state. Land use surrounding the site consists of the BNSF Railway – Barstow Yard, along with undeveloped land, to the north, mixed residential and commercial properties to the south and east, and undeveloped vacant land west of the project site.

The ESA focused its evaluation on RECs which include site conditions that may reveal signs of releases and potential releases of pollutants, hazardous substances, petroleum and petroleum products, contaminants, and controlled substances. Following the assessment, no evidence of current or previous RECs or Controlled RECs at the project site property was identified. However, the Phase 1 ESA noted a significant data-gap, given the lack of San Bernardino County Fire Department (SBCFD) data, which upholds records of hazardous material, waste generation, underground storage tanks, and other potential environmental issues. As such, the Phase 1 ESA qualified its findings, as there may be unidentified environmental concerns within the site, and recommended review of SBCFD data at the site.

## NEPA Preferred Alternative

The analysis to identify other potential sites to finalize the NEPA Preferred Alternative was not conducted.

## Analysis Methodology

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The Title VI analysis for the Barstow O&M Facility site was conducted using American Community Survey 5-year estimate (2015-2020) data at the block group level. The intent of the analysis was to determine if there were any disparate impacts or disproportionate burdens to populations in the vicinity of the site. A disparate impact disproportionately affects minorities, while a disproportionate burden refers to disproportionately affects low-income populations.

The Barstow O&M Facility Project Study Area (PSA) is defined as block groups that fall within a half-mile radius of the Barstow O&M Facility site. Minority and low-income populations were identified in the block groups that were within a half-mile buffer of the Barstow O&M Facility site (**Table 1** and Error! Reference source not found.). These populations were then compared to the City of Barstow (VVTA service area in this jurisdiction) statistics. This analysis was conducted to ensure that the Barstow O&M Facility site was selected without regard to race, color, or national origin.

The same Title VI demographic metrics of the Barstow O&M Facility will also be compared with the State Street O&M Facility to determine if the new site will have less disparate impact on the Title VI population than the old site.

## Minority Populations

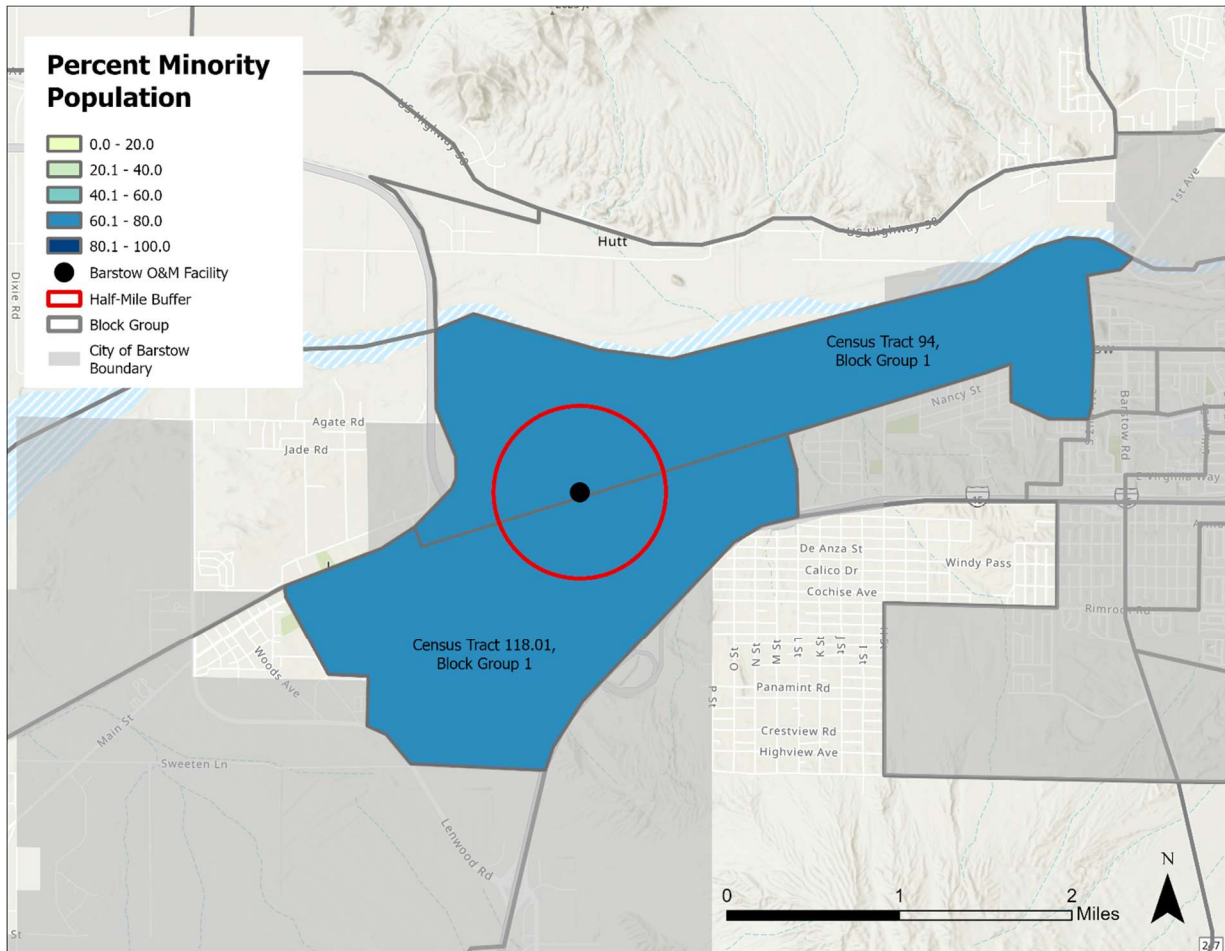
Minority populations were identified using American Community Survey *Table B03002 Hispanic or Latino Origin by Race*. Minorities are individuals that as not white. This analysis was conducted at the block group level using 2015-2020 5-year estimates.<sup>2</sup>

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<sup>2</sup> The site construction was completed in 2020, therefore, the Title VI analysis was conducted using 2020 5-year estimates data.



Figure 4. Percentage of Minority Populations by Block Group at Barstow O&M Facility



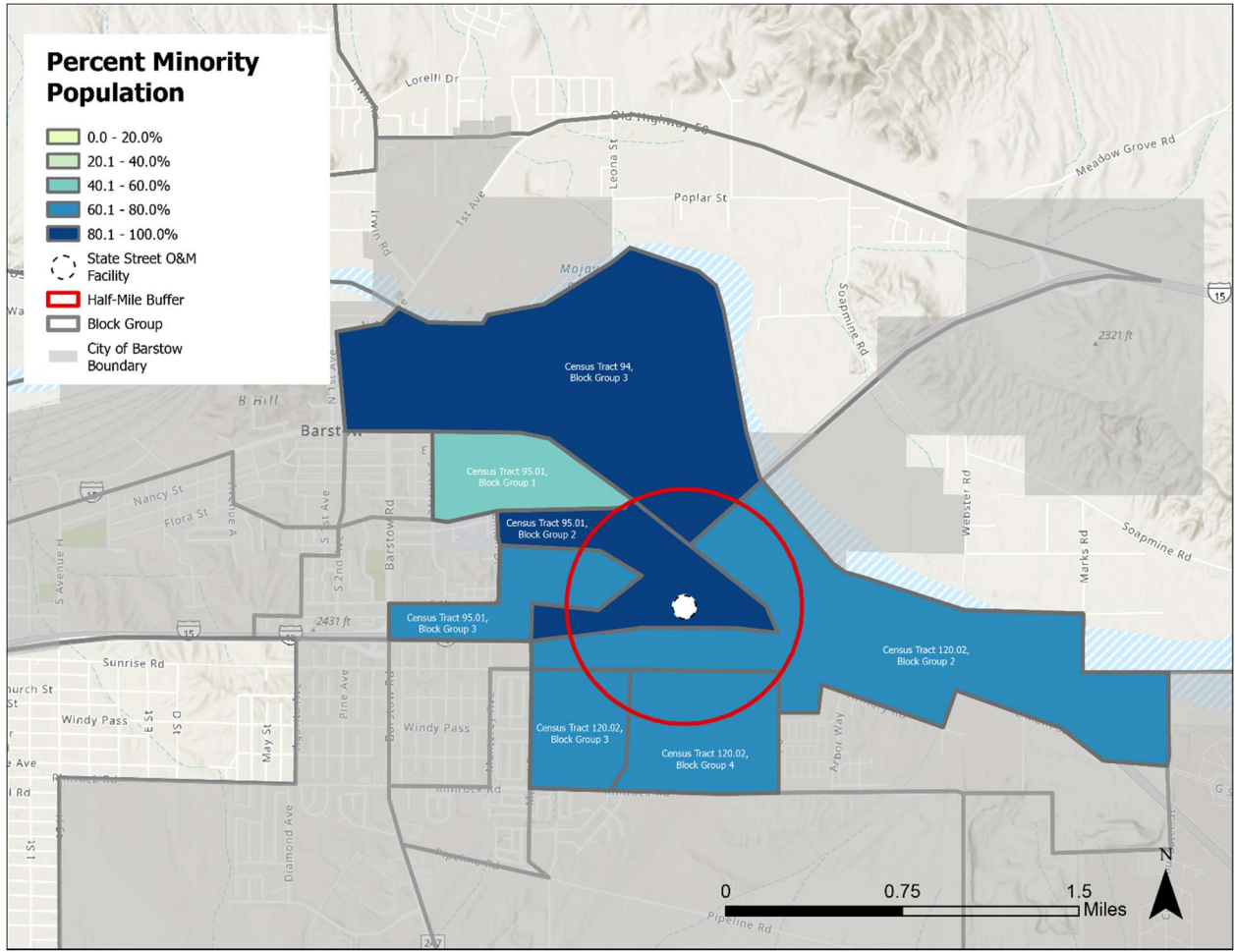
Source: AECOM 2024; U.S. Census Bureau, TIGER/Line Shapefile, Nation, U.S., Census Block Groups 2020.

Table 1. Minority Populations at Barstow O&M Facility

Block Group 1	Population	Minority Population	Percent Minority
Census Tract 94	1,065	768	72.1%
Census Tract 118.01	1,761	1,258	71.4%
Barstow O&M Facility PSA	2,826	2,026	71.7%
City of Barstow	25,939	18,989	73.2%

Source: U.S. Census Bureau 2020

**Figure 5. Percentage of Minority Populations by Block Group at State Street O&M Facility**



Source: AECOM 2024; U.S. Census Bureau, TIGER/Line Shapefile, Nation, U.S., Census Block Groups 2020.

Note: Census Tract 95.01, Block Group 1 will be excluded from the calculation in the table.

**Table 2. Minority Populations at State Street O&M Facility**

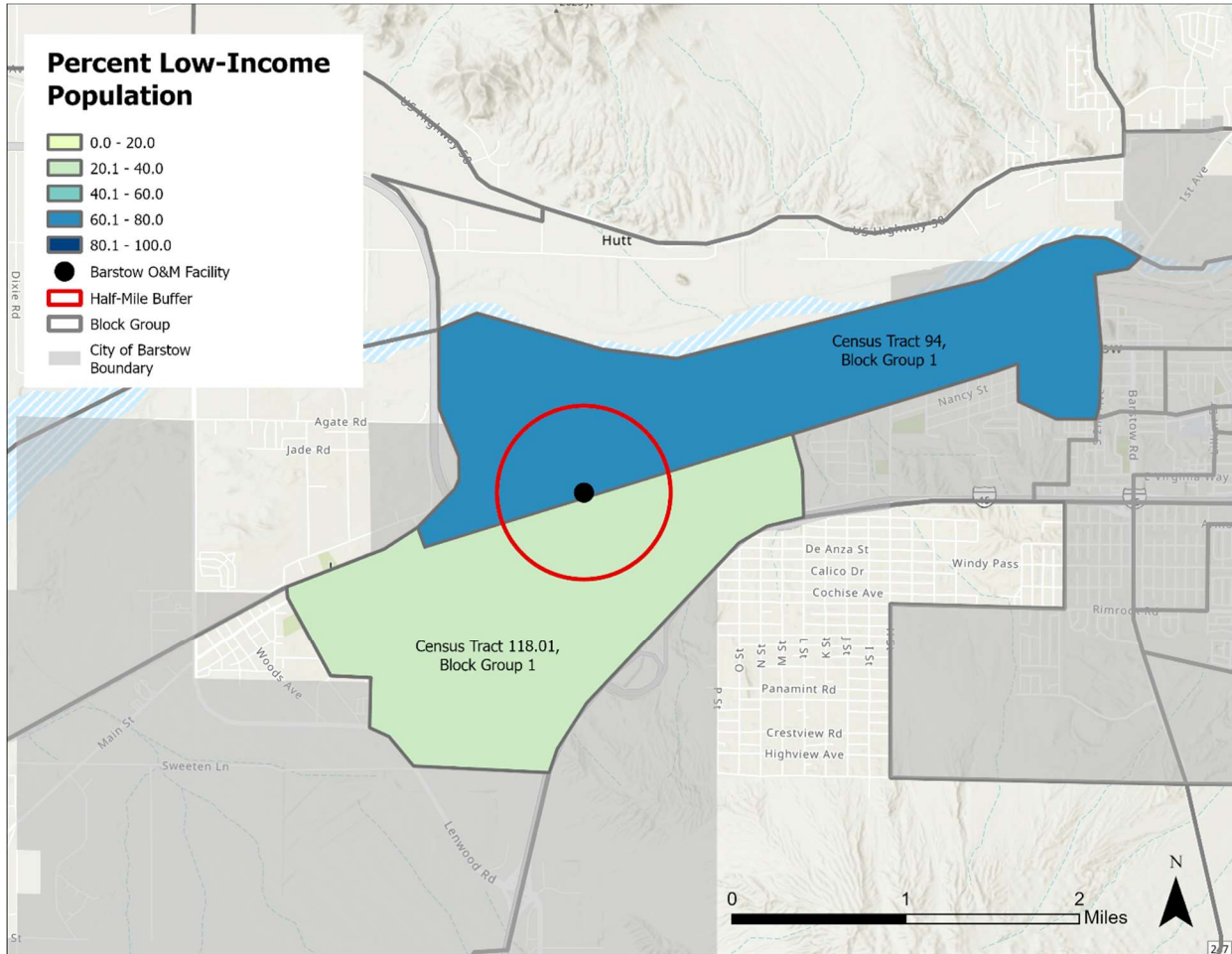
Census Tract #, Block Group #	Population	Minority Population	Percent Minority
Census Tract 95.01, Block Group 2	932	754	80.9%
Census Tract 120.02, Block Group 2	1,131	748	66.1%
Census Tract 94, Block Group 3	1,729	1,467	84.8%
Census Tract 95.01, Block Group 3	1,965	1,556	79.2%
Census Tract 120.02, Block Group 3	1,147	889	77.5%
Census Tract 120.02, Block Group 4	2,318	1,810	78.1%
State Street O&M Facility PSA	9,222	7,224	78.3%
City of Barstow	25,939	18,989	73.2%

Source: U.S. Census Bureau 2020

## Low-Income Populations

Low-income populations are defined as any individual or household with income at or below the U.S. Census poverty thresholds. As suggested by FTA Circular 4702.1B, all individuals whose family income is at or below 150 percent of the poverty line were considered low-income. VVTA’s Title VI program uses FTA’s suggested definition for low-income population. Low-income populations were identified using American Community Survey *Table C17002 Ratio of Income to Poverty Level in the Past 12 Months*. This analysis was conducted at the block group level using 2015-2020 5-year estimates.

Figure 6. Percentage of Low-Income Populations by Block Group at Barstow O&M Facility



Source: AECOM 2024; U.S. Census Bureau, TIGER/Line Shapefile, Nation, U.S., Census Block Groups 2020.

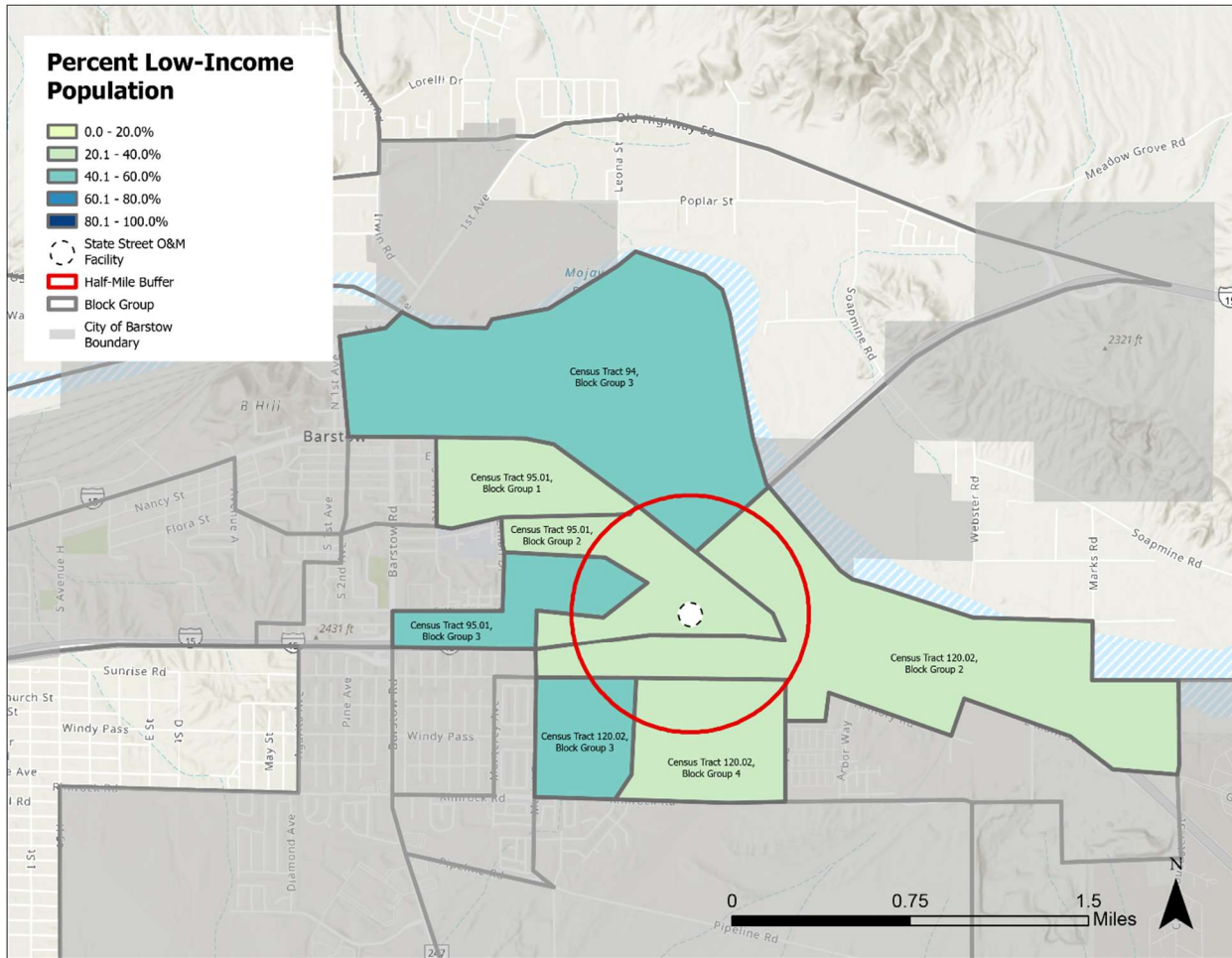
Table 3. Low-Income Populations at Barstow O&M Facility

Block Group 1	Population	Low-Income Population	Percent Low-Income
Census Tract 94	1,065	764	71.7%
Census Tract 118.01	1,751	518	29.6%
Barstow O&M Facility PSA	2,816	1,282	45.5%
City of Barstow	25,939	10,012	38.6%



Source: U.S. Census Bureau 2020

Figure 7. Percentage of Low-Income Populations by Block Group at State Street O&M Facility



Source: AECOM 2024; U.S. Census Bureau, TIGER/Line Shapefile, Nation, U.S., Census Block Groups 2020.

Note: Census Tract 95.01, Block Group 1 will be excluded from the calculation in the table.

Table 2. Low-Income Populations at State Street O&M Facility

Census Tract #, Block Group #	Population	Low-Income Population	Percent Low-Income
Census Tract 95.01, Block Group 2	932	292	31.3%
Census Tract 120.02, Block Group 2	1,131	312	27.6%
Census Tract 94, Block Group 3	1,691	1,005	59.4%
Census Tract 95.01, Block Group 3	1,895	853	45.0%
Census Tract 120.02, Block Group 3	1,097	647	59.0%
Census Tract 120.02, Block Group 4	2,305	505	21.9%
State Street O&M Facility PSA	9,051	3,614	39.9%
City of Barstow	25,939	10,012	38.6%

Source: U.S. Census Bureau 2020

## Zoning Analysis

The census block groups are still larger in Barstow, so it is important to show the closest residential area to the Barstow O&M facility on Main Street. As indicated in **Figure 2**, the nearest residential, Low Density Residential, is approximately 700 ft east of the facility.

## Results of Title VI Analysis

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The Barstow O&M Facility PSA is located on block groups with lower averages for minority population but one of the block group adjacent to the facility site has a higher low-income population relative to the City of Barstow. Therefore, disparate impact to minority populations is not anticipated but disproportionate burden on low-income populations is anticipated. However, the site was already owned by VVTA, and no one was displaced because of the new Barstow O&M Facility. In addition, the impacts of the new facility are less than the old facility located on State Street which further validates the site relocation.

## Minority Populations

The impact threshold for this metric is defined by the average percentage of minority population of City of Barstow, which is 73.2 percent. The minority population within the Barstow O&M Facility PSA is 71.7 percent, lower than the impact threshold. The minority population within the State Street O&M Facility PSA is 78.3 percent, higher than the impact threshold.

### Conclusions of Effects

The Barstow O&M Facility would not be expected to have disparate impacts based on race, color, or national origin because it is in block groups where the minority populations are less than the City of Barstow. The Barstow O&M Facility has less impact on the minority population compared to the old State Street Facility.

## Low-Income Populations

The impact threshold for this metric is defined by the average percentage of minority population of City of Barstow, which is 38.6 percent. The low-income population within the Barstow O&M Facility PSA is 45.5 percent, higher than the impact threshold. The low-income population within the State Street O&M Facility PSA is 39.9 percent, higher than the impact threshold. Both sites have 50% (one out of two for the new site and three out of six for the old site) of the RSA block groups having low-income populations higher than the impact threshold.

### Conclusions of Effects

The Barstow O&M Facility would have expected to have disproportionate burden based on low-income populations because it is in census tract 94, block group 1 (71.7%) where the low-income populations are much higher than the City of Barstow (38.6%). Relative to the State Street O&M Facility, the Barstow O&M Facility has a higher disparate impact on low-income populations (45.5% and 39.9%, respectively) and a lower disparate impact on minority populations (71.7% and 78.3%, respectively).

## Mitigation Measures

The Phase I ESA revealed that no RECs were identified in connection with the site, therefore no negative impacts can be expected from the site activities.

The distance of the site to the nearest residential area is 700 ft. The site will generate deadhead and in-service bus activities along Main Street. The noise level in the residential area might increase, though it might be insignificant, due to the new activities. The significance of the increased noise level would have to be calculated by comparing the proposed noise level to the existing noise level.

Lack of NEPA compliant documentation such as the most detailed Environmental Impact Statements (EIS) to the less comprehensive Environmental Assessments (EA) and Categorical Exclusions (CE) leaves data gap to provide detailed mitigation measures to mitigate the disproportionate burden on low-income populations.

## Outreach

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Outreach as it relates to the planning of the Barstow O&M Facility was not conducted.

## Conclusions and Next Steps

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The site identified and evaluated for the location of the Barstow O&M Facility was selected without disparate impacts regarding race, color, or national origin. Minority and low-income populations were evaluated at the block group level in the vicinities of the Barstow O&M facility. The average for the minority population in the vicinity of the Barstow O&M Facility is lower than the service area average, however, the average for low-income population of one of the vicinity block groups is higher than the service area average. Therefore, a disproportionate burden on the low-income populations is anticipated with the selection of the Barstow O&M Facility Site. Mitigation measures will need to be developed in more detailed NEPA compliant documents in addition to the Phase I ESA that was conducted in 2016.