



**NAPA COUNTY TRANSPORTATION AND  
PLANNING AGENCY**

**TITLE VI PROGRAM POLICY**

# TITLE VI PROGRAM POLICY

*The Napa County Transportation and Planning Agency (NCTPA) is committed to ensuring that no person is excluded from participation in, or denied benefits of its transit services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964. If you believe you have been subjected to discrimination under Title VI, you may file a written complaint with the Manager of Human Resources, Napa County Transportation and Planning Agency, 625 Burnell Street, Napa CA, 94558; at (707) 259-8631, or by email to [ksanderlin@nctpa.net](mailto:ksanderlin@nctpa.net).*

**Purpose:** The purpose of this policy is to establish guidelines to effectively monitor and ensure that the Napa County Transportation and Planning Agency (NCTPA) is in compliance with all requirements and regulations to carry out the provisions of the Department of Transportation's (DOT) Title VI Regulations 49 CFR Part 21.

**Policy:** NCTPA will ensure that their programs, policies, and activities all comply with the Department of Transportation's (DOT) Title VI regulations. NCTPA is committed to creating and maintaining public transit service that is free of all forms of discrimination. The agency will take whatever preventive, corrective and disciplinary action necessary for behavior that violates this policy or the rights and privileges it is designed to protect.

## TITLE VI PROGRAM MONITORING

The requirement to establish internal monitoring processes and methodologies is applicable to all recipients of Federal assistance. NCTPA must monitor its service once per year, or when major service changes or fare increases are proposed, using the procedures outlined in this section.

### a. Civil Rights Assurance

The Assurances that are signed by NCTPA's Executive Director, and attested by NCTPA's Legal Counsel, validate the level and quality of transit services and related benefits are provided in a manner consistent with Title VI. Program monitoring is conducted to ensure that NCTPA complies with this assurance.

### b. Monitoring Procedures

NCTPA has a complaint procedure to monitor the level and quality of transit service provided to minority communities with overall average services deployed throughout the system in order to affirm the services are distributed equitably and comply with Title VI.

## **PUBLIC INFORMATION REQUIREMENTS**

NCTPA disseminates Title VI Program information to NCTPA employees, contractors, subcontractors, and beneficiaries. NCTPA makes these materials available to the general public by posting information at major transit hubs, on its website (which includes Title VI/Civil Rights complaints procedures), and by publishing an annual Title VI Policy Statement in local newspapers. The local newspapers that NCTPA uses to publish information about public meetings and/or hearings, service changes, and proposed projects have significant circulations in the community. NCTPA also publishes information in minority publications. Information about Title VI and NCTPA's policies are also clearly stipulated in NCTPA's postings for contracting and employment opportunities. Specifically,

- a. NCTPA's Title VI Policy and any other related information is made available to the public upon request.

More detailed information regarding complaint procedures and Title VI civil rights is included in brochures and other materials distributed to the public by NCTPA and is available on NCTPA's websites ([www.nctpa.net](http://www.nctpa.net) and [www.ridethevine.com](http://www.ridethevine.com)).

- b. Multilingual Requirements. Where a significant number or portion of the population eligible to be serviced by NCTPA needs service information in a language other than English to participate in federally funded programs, NCTPA takes every reasonable step to provide information in appropriate languages. In cases where NCTPA posts signs warning the general public about dangerous situations, information in other languages when a significant number of the population in non English speaking. NCTPA's websites are also linked to the Google translator which can provide translation in over 70 languages.

## **LIMITED ENGLISH PROFICIENCY (LEP) FOUR FACTOR ANALYSIS AND LANGUAGE ASSISTANCE PLAN (LAP)**

NCTPA has developed a Language Assistance Plan based on its Four Factor Analysis consistent with the Federal Transit Administrations policy guidelines. The Plan guides NCTPA on all service-related planning and policy changes under consideration, NCTPA staff will analyze and conduct the four-factor framework provided in the Department of Transportation (DOT) LEP Guidance. NCTPA's complete LAP plan is included as Appendix 1.

## **PUBLIC PARTICIPATION PLAN**

The Public Participation Plan (Appendix 2) outlines the strategies that NCTPA uses to engage the public in the process of transportation decisions. This plan is utilized to cultivate relations with the community and encourage interaction with the minority of non-English speaking communities. Public Notices and general information are provided in both English and Spanish.

#### **a. OPPORTUNITIES FOR PUBLIC COMMENT**

NCTPA routinely provides opportunities for public comment, and continually strives to find new and innovative opportunities to solicit public comments and involve all segments of the population. Comments are accepted at any time by phone, fax, email, U.S. mail, in person, or at any open meeting. Examples of these opportunities include:

- The public is notified of monthly NCTPA Board and Committee meetings. The public is invited to attend these meetings. Meeting announcements are posted on the website, at the NCTPA offices, and at the meeting location if held at a location other than the NCTPA offices. The public is invited to comment on general items or specific agenda items.

#### **b. ENGAGING TITLE VI PROTECTED GROUPS**

NCTPA realizes that there are large segments of the population from whom input is rarely if ever received. In an effort to hear a truly representative voice of the public, NCTPA makes all significant service-related planning and policy publications available in accessible formats.

#### **c. PUBLIC OUTREACH**

NCTPA publishes monthly memos and newsletters as an on-going, proactive dissemination of service information and to cultivate public relations. These publications contain articles and features of current issues and projects. Moreover, they serve as a valuable information tool to present transportation planning to the public.

#### **d. STAFF ACCESSIBILITY**

Staff is accessible in person, on the phone, by mail, by fax, or by email. Contact information is provided on the agency's website and on public notices.

#### **e. PROVIDE SERVICE FOR THE DISABLED AND LEP**

Upon advance notice, special accommodations are provided for public meetings. These services include translators, special assistance, and/or transportation.

### **COMPLAINTS OF DISCRIMINATION PROCEDURE**

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Civil Rights Restoration Act of 1987, and the Americans with Disabilities Act of 1990, relating to any program or activity administered by NCTPA as to consultants, and contractors. Intimidation or retaliation of

any kind is prohibited by law. The procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination. Every effort is made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the Title VI Coordinator may be utilized for resolution.

### **Complaint Procedure**

1. Any person who feels that he or she, individually, or as a member of any class of persons, on the basis of race, color, national origin, age, sex, disability, religion, or low-income status has been excluded from or denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance through NCTPA may file a written complaint with the Manager of Human Resources. The complaint form (Appendix 3) may be found on the NCTPA website by clicking the following link: [www.nctpa.net](http://www.nctpa.net) or is available in hard copy from the NCTPA. A formal complaint must be filed within 180 days of the alleged occurrence.
2. In cases where the complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The Manager of Human Resources will interview the complainant and if necessary assist the person in converting verbal complaints to writing. All complaints must, however, be signed by the complainant or his/her representative.
3. Complaints shall state, as fully as possible, the facts and circumstances surrounding the alleged discrimination.
4. NCTPA will provide the complainant or his/her representative and any contractor (respondent) with a written acknowledgement that NCTPA has received the complaint within five (5) working days of receipt.
5. A copy of the complaint will be forwarded to NCTPA's legal counsel for review.
6. The Manager of Human Resources will appoint one or more staff review officers, as appropriate, to evaluate and investigate the complaint.
7. The review officer(s) will determine if the complaint has investigative merit:
  - a. It was received within 180 days of the alleged occurrence.
  - b. It does not appear to be frivolous or trivial.
  - c. It involves NCTPA or NCTPA contractors and not another entity.
  - d. A complaint against a contractor involves a NCTPA Federally Funded contract.
8. The complainant and contractor or other party to the complaint will be notified of the status of the complaint within 10 days of receipt of the complaint, *by registered mail*;

- a. That the complaint will not be investigated and the reasons why the complaint does not have investigative merit.
  - b. That the complaint will be investigated and a request for additional information needed to assist the investigator.
9. The complainant or contractor must submit the requested information within 60 working days from the date of the original request. Failure of the complainant to submit additional information within the designated timeframe may be considered good cause for a determination of no investigative merit. Failure of the contractor to submit additional information within the designated timeframe may be considered good cause for a determination of noncompliance under the contract.
10. The review officer(s) and/or contractor must within 15 working days, supply the Executive Director with status report of their investigation and/or resolution of the complaint.
11. Within 60 working days of the receipt of the complaint, the Manager of Human Resources will prepare a written report for the Executive Director. The report shall include:
  - a. A narrative description of the incident. Including persons or entities involved.
  - b. A statement of the issues raised by the complainant and the respondent's reply to each of the allegations.
  - c. Citations of relevant Federal, State and local laws, NCTPA policy etc.
  - d. Description of the investigation, including list of the persons contacted and a summary of the interviews conducted.
  - e. A statement of the investigator's finding and recommendations for disposition.
12. The investigative report and findings of the complaint will be sent to legal counsel for review.
13. The Executive Director shall, based on the information before him or her and in consult with legal counsel, make a determination on the disposition of the complaint. Determination shall be made within 10 days from Executive Director's receipt of the investigator's report. Examples of disposition are as follows:
  - a. Complainant is found to have been discriminated against. NCTPA or Contractor is therefore in noncompliance with Title VI regulations. Reasons for the determination will be listed. Remedial actions that NCTPA or the Contractor must take will be listed.
  - b. Complaint is found to be without merit. Reasons why will be listed.
14. Notice of the Executive Director's determination will be mailed to the complainant and contractor. Notice shall include information regarding appeal rights of complainant and instructions for initiating such an appeal. Example of a notice of appeal follows:

- a. NCTPA will only reconsider this determination, if new facts, not previously considered.
  - b. If the complainant is dissatisfied with the determination and/or resolution set forth by NCTPA, the same complaint may be submitted to the Federal Transit Administration (FTA) for investigation. Complainants will be directed to contact Federal Transit Administration, Office of Civil Rights, 201 Mission Street, Suite 1650; San Francisco, CA 94105 / (415) 744-3133.
15. A copy of the complaint and NCTPA's investigation report/letter of finding and Final Remedial Action Plan will be issued to FTA within 90 days of the receipt of the complaint.
  16. After receiving FTA's comments, briefings may be scheduled with all relevant parties to the complaint.
  17. A summary of the complaint and its resolution would be included in the annual report to the FTA.

## **GENERAL REPORTING REQUIREMENTS**

Title VI of the Civil Rights Act of 1964 (Title VI), states the following: "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal Financial assistance."

The Department of Justice and the Department of Transportation regulations implementing Title VI, require Federal agencies to collect data and other information to enforce Title VI. In this regard the Napa County Transportation and Planning Agency (NCTPA), as an applicant and/or recipient receiving Federal funding, hereby provides to FTA the following information:

- There are no active lawsuits or complaints naming NCTPA nor were there any investigations, complaints, or lawsuits in the past three years, which allege discrimination on the basis of race, color, or national origin with respect to service or other transit benefits.
- There are currently no pending construction projects which would negatively impact minority communities being performed by NCTPA.

## **SERVICE STANDARDS**

In order to insure compliance with the Title VI Program and to accomplish the goal of providing efficient and effective service to the residents of Napa County, NCTPA developed a series of service standards (Appendix 4) that provide a framework for service allocation as well as measures to continually examine public transit service to

ensure that they meet efficiency and effectiveness standards in accordance with stated objectives.

## **RECORD KEEPING REQUIREMENTS**

The Manager of Human Resources shall ensure that all records relating to NCTPA's compliance to Title VI are maintained for a minimum of seven years.

Records must be available for compliance review audits.

Copies of the following material will be kept available by the Manager of Human Resources for dissemination to the public upon demand:

- NCTPA's Title VI policy
- Annual reports to FTA
- Audit report findings and recommendations
- Summaries of actions taken by NCTPA to remedy audit findings
- Complaints received and a summary of their disposition
- Annual report to Executive Director regarding Title VI compliance

## **APPENDICES**

- Appendix 1 NCTPA Plan for Language Assistance Plan to Limited English Proficient (LEP) Populations
- Appendix 2 Public Participation Plan
- Appendix 3 Title VI Complaint Form
- Appendix 4 Service Standards and Design
- Appendix 5 Title VI Notice to the Public



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

**December 3, 2013**

**Also available in Spanish**

**Napa County Transportation and Planning Agency**

**625 Burnell Street**

**Napa, CA 94559**

**[contact@nctpa.net](mailto:contact@nctpa.net)**

**(707) 259-8631**

Para solicitar una copia en español del Plan de Servicios de Lenguaje para Poblaciones con Conocimiento Limitado del Inglés por favor llame al (707) 259-8631

# **Language Assistance Plan for Napa County Transportation and Planning Agency (NCTPA)**

## **Introduction**

NCTPA serves as the congestion management agency and public transit provider for the jurisdictions in Napa County, and is one of the nine Bay Area counties within the Metropolitan Transportation Commission (MTC) region. NCTPA's service area includes a population of some 139,000 residents in over 740 square miles of land, consisting mostly of smaller, rural communities and agricultural land. The service area is diverse, with large numbers of residents speaking a language other than English as their primary means of communication.

Individuals who have a limited ability to read, write, speak or understand English are considered to be limited English proficient, or "LEP." In compliance with guidance and rules issued by the U.S. Department of Transportation, and Title VI of the Civil Rights Act of 1964, NCTPA has taken reasonable steps to ensure that all persons have meaningful access to its programs, services, and information, at no additional cost. This includes the following plan for LEP persons within NCTPA's jurisdiction.

A Language Assistance Plan starts with an assessment to identify LEP individuals who need assistance. NCTPA will perform an on-board rider survey in the spring of 2014 and the survey results will be available in summer 2014. NCTPA also plans to conduct internal surveys with transit operators, dispatch, customer service and ticket sales staff, regarding frequency of contact with LEP individuals or groups. Once the assessment is complete, the Language Assistance Plan is drafted and adopted by the agency.

Implementation of the Language Assistance Plan includes the development of language assistance measures, staff training, notification measures to LEP individuals, and monitoring and updating of the plan on a yearly basis.

## **Purpose**

The purpose of this Language Assistance Plan (hereinafter "plan") is to ensure members of the public have access to public information and services provided by NCTPA and to meet Federal Transit Administration's (FTA) requirements to comply with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin. As a subrecipient of FTA funds, NCTPA is required to take reasonable steps to provide meaningful access to its transit services for persons who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. The FTA refers to these persons as Limited English Proficient (LEP) persons.

The U.S. DOT's FTA Office of Civil Rights' publication "*Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons – A Handbook for Public Transportation Providers*" was used in the preparation of this plan.

## Contents

This plan contains:

- A. A needs assessment based on the four-factor analysis
- B. Language assistance measures
- C. Staff training plan
- D. Methods for notifying LEP persons about available language assistance
- E. Methods for monitoring, evaluating and updating plan

### **A. LEP Needs Assessment – the Four-Factor Analysis**

#### **Determination of Need**

In order to prepare this Plan, NCTPA implemented the U.S. Department of Transportation’s four factor LEP analysis, which considers the following:

1. The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population
2. The frequency with which LEP persons come in contact with NCTPA programs, activities or services
3. The Importance to LEP Persons of NCTPA’s Program, Activities and Services
4. The resources available to NCTPA and overall cost to provide LEP assistance

#### ***Factor 1: Number and proportion of LEP persons served or encountered***

NCTPA used the American Community Survey (ACS) 5 Year survey data for 2007-2011 for Limited English Proficient (LEP) Populations in Napa County to estimate the number or proportion of LEP persons who might use or want to use NCTPA’s services.

The American Community Survey (ACS) 5 Year survey data identifies people who speak English “less than very well” as Limited English Proficient persons. The survey data is broken down by the languages spoken at home, and by ability to speak English, for persons five years of age and older, with number and percentage broken out by county. For Napa County, the ACS data indicates that approximately half of the residents identified as speaking a “language other than English”, and whose primary language is categorized as “Spanish or Spanish Creole”, were identified as speaking English “less than very well”. The ACS study data also indicates that nearly 40% of the Asian and Pacific Islanders in Napa County speak English “less than very well”.

2007-2011 American Community Survey  Language Spoken at Home	Total		Percent of specified language speakers			
	Estimate	Margin of Error	Speak English "very well"		Speak English less than "very well"	
			Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	127,288	+/-76	83.5%	+/-1.0	16.5%	+/-1.0
Speak only English	65.9%	+/-1.1	(X)	(X)	(X)	(X)
Speak a language other than English	34.1%	+/-1.1	51.7%	+/-2.5	48.3%	+/-2.5
Spanish or Spanish Creole	26.7%	+/-1.0	47.6%	+/-3.0	52.4%	+/-3.0
Other Indo-European languages	2.7%	+/-0.4	80.6%	+/-5.3	19.4%	+/-5.3
Asian and Pacific Island languages	4.4%	+/-0.4	58.2%	+/-5.3	41.8%	+/-5.3
Other languages	0.3%	+/-0.1	66.3%	+/-14.1	33.7%	+/-14.1
<b>SPEAK A LANGUAGE OTHER THAN ENGLISH</b>						
Spanish or Spanish Creole	33,979	+/-1,234	47.6%	+/-3.0	52.4%	+/-3.0
5-17 years	8,954	+/-586	69.2%	+/-5.5	30.8%	+/-5.5
18-64 years	23,481	+/-860	39.8%	+/-3.1	60.2%	+/-3.1
65 years and over	1,544	+/-152	39.7%	+/-11.0	60.3%	+/-11.0
Other Indo-European languages	3,419	+/-555	80.6%	+/-5.3	19.4%	+/-5.3
5-17 years	314	+/-148	87.9%	+/-15.9	12.1%	+/-15.9
18-64 years	2,261	+/-446	82.1%	+/-7.5	17.9%	+/-7.5
65 years and over	844	+/-204	73.9%	+/-10.1	26.1%	+/-10.1
Asian and Pacific Island languages	5,649	+/-476	58.2%	+/-5.3	41.8%	+/-5.3
5-17 years	715	+/-183	68.3%	+/-14.6	31.7%	+/-14.6
18-64 years	4,054	+/-355	63.0%	+/-6.0	37.0%	+/-6.0
65 years and over	880	+/-152	28.2%	+/-13.2	71.8%	+/-13.2
Other languages	365	+/-166	66.3%	+/-14.1	33.7%	+/-14.1
5-17 years	65	+/-90	58.5%	+/-22.3	41.5%	+/-22.3
18-64 years	242	+/-107	71.9%	+/-18.9	28.1%	+/-18.9
65 years and over	58	+/-45	51.7%	+/-37.1	48.3%	+/-37.1
<b>CITIZENS 18 YEARS AND OVER</b>						
All citizens 18 years and over	87,477	+/-993	92.5%	+/-0.8	7.5%	+/-0.8
Speak only English	78.7%	+/-1.0	(X)	(X)	(X)	(X)
Speak a language other than English	21.3%	+/-1.0	65.0%	+/-3.3	35.0%	+/-3.3
Spanish or Spanish Creole	14.5%	+/-0.9	63.8%	+/-4.2	36.2%	+/-4.2
Other languages	6.8%	+/-0.5	67.5%	+/-4.3	32.5%	+/-4.3

- The ACS data above estimates the total population of the NCTPA Napa County service area to be: 127,288.
- The ACS data above estimates the total number of people who speak a language other than English in the NCTPA Napa County service area is estimated to be: 43,405 or 34.1% of the population.
- The ACS data above estimates the total number of LEP persons (those who speak English less than "very well") in the NCTPA Napa County service area is estimated to be: 21,702 or 17% of the population.

**Factor 2: Frequency of LEP populations’ contact with existing programs, activities, and services**

Statistical data regarding individual requests from LEP persons will be tracked as resources permit; however since several transit routes serve Napa County social service and non-profit agencies, it is likely that NCTPA is providing services to many LEP individuals.

The main language spoken by LEP individuals within the NCTPA service area is primarily Spanish.

**Factor 3: Importance to LEP population of programs, activities, and services**

NCTPA considers public transit to be an important and essential service for many residents, commuters, and visitors in the local service area. This includes local buses and buses servicing neighboring counties and the regional BART system, paratransit, and services for seniors. These services are used by people from all walks of life, including commuters, students, visitors, the elderly, and those with limited mobility.

**Factor 4: Resources available to NCTPA and overall cost to provide LEP assistance**

NCTPA makes every reasonable effort to communicate with LEP persons about available transit services, including providing the funding for translation of current services and bilingual materials. As resources permit, NCTPA will include training for all drivers on best practices for serving LEP individuals.

In addition to using a translation service, NCTPA recently hired additional Spanish-speaking staff at the ticket desk to better serve LEP individuals. NCTPA has also translated key website pages into Spanish.

In an effort to better serve the transit service needs of its users, NCTPA recently completed construction of its new Transit Center facility. The expanded facility will allow NCTPA to better market and communicate its transit services and serve the needs of the traveling public, including those of LEP populations.

NCTPA works with many advocacy groups serving LEP individuals to gain insight regarding their needs and concerns about local transit services. This includes Napa County Department of Health and Human Services, Community Action Napa Valley, SOMOS Napa, Hispanic Network, Non-profit Coalition, and Legal Aid of Napa Valley. NCTPA is continually exploring options for the best methods of delivering information and meeting the transit needs of all LEP persons and Napa County residents. NCTPA undertook significant Spanish-language outreach during its Agricultural Worker Vanpool Program and continues to expand community outreach efforts agency-wide.

**B. Language Assistance Measures**

Language measures currently used and planned to be used by the NCTPA transit system to address the needs of LEP persons include the following:

Translating key documents in the following language(s): Spanish (other languages as needed)

Translating key website pages

- Coordination of Oral and Written Translation Services
- Communication with LEP advocacy groups about transit services
- Increased use of signage with graphic visual images and pictograms to promote universal understanding
- Posting of bilingual notices informing LEP persons of available services
- Other (description of services): training new residents on how to use transit system

### **C. Staff Training**

To ensure effective implementation of this plan, NCTPA will schedule orientations for new staff and annual training for all employees whose position requires regular contact with the public. Training will include a review of this plan and how to handle verbal requests for transit service in a language other than English.

### **D. Notice to LEP Persons about Available Language Assistance**

NCTPA will notify LEP individuals about the language assistance services available to them without cost by using the following methods:

- Brochures
- Sending information to local organizations serving LEP populations
- Website notices
- Including contact information for translation requests on all printed materials
- Posting of bilingual flyers at libraries, churches, schools, cultural and community centers
- Audio programs and radio ads
- Participation in local community events

### **E. Monitoring, Evaluating and Updating Plan**

NCTPA staff will review this plan annually, including:

- Assessing the sufficiency of staff training and budget for language assistance,
- Reviewing current sources for assistance to ensure continuing availability, and
- Reviewing any complaints, comments and suggestions from LEP persons, or agencies serving LEP populations, received during the past year.

**Annual plan revisions will be approved by the agency’s Executive Director and dated accordingly.**

## **F. Dissemination of Plan**

This plan is available on the NCTPA website at [www.nctpa.net](http://www.nctpa.net).

This plan is also available at no cost in English or Spanish upon request by telephone, fax, U.S. Postal Service mail, e-mail, or in person at the NCTPA office.

## **G. Contact Information**

Questions or comments about this plan may be submitted to:

Napa County Transportation and Planning Agency  
ATTN: Civil Rights Officer  
625 Burnell Street  
Napa, CA 94559  
(707) 259-8631  
(707) 259-8638

Published: December 2013

APPENDIX 2



**Napa County Transportation and Planning Agency (NCTPA)**

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

**December 2013**

**Also available in Spanish**

**Napa County Transportation and Planning Agency (NCTPA)**

**625 Burnell Street**

**Napa, CA 94559**

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## EXECUTIVE SUMMARY

The mission of the Napa County Transportation & Planning Agency (NCTPA) is to ensure the development of an efficient, effective and equitable transportation system for the residents, businesses and visitors to the Napa region, through a coordinated inter-jurisdictional decision making process. In order to carry out its mission to its fullest potential, NCTPA solicits and receives input from all of its stakeholders, regardless of race, language or socioeconomic status.

Multicultural outreach and environmental justice initiatives are founded on the recognition of a community's cultural and economic diversity, as well as the awareness that some groups have not always enjoyed equal access to information, services, or other resources. Recent U.S. Census reports<sup>1</sup> indicate that Napa County fares better than many parts of the state: average rates of poverty in Napa County are below state averages, and average income is higher than the state average. However, these assessments cannot take into account the many cultural and economic challenges with which some individuals and groups are faced. As in other parts of California, the ethnic composition of Napa County is changing. Once predominantly Caucasian, the population of Hispanic or Latino residents has grown considerably in the last decade. Populations of Asian, African-American, Indo-European, Pacific Islander and Middle-Eastern people have also grown.

This Title VI Public Participation Plan (PPP) aims to identify communities that have been traditionally underserved by NCTPA and determine the most effective ways to encourage the participation of these communities. The PPP is designed to be a living document that will be updated yearly to incorporate new data, methods, and outcomes, as identified through local outreach activities and best practices in the field. The NCTPA will work with community partners to identify and implement strategies that remove barriers to access and participation for diverse community members.

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<sup>1</sup> U.S. Census 2012 Estimates, [Quickfacts.census.gov/qfd/states/06/06055.html](https://www.census.gov/quickfacts/cd/states/06/06055)

## **1. INTRODUCTION**

NCTPA serves as the congestion management agency and public transit provider for the jurisdictions within Napa County, one of the nine Bay Area counties within Metropolitan Transportation Commission (MTC) region. According to 2012 population estimates, nearly 140,000 people reside on the roughly 740 square miles of land in Napa County. Land types include a mixture of smaller, rural communities and agricultural land. NCTPA provides services to a diverse group of stakeholders, with a mixture of English and non-English speakers from a variety of cultural and socioeconomic backgrounds. The NCTPA makes every reasonable effort to address the needs of all stakeholders by providing equal access and opportunities for ongoing involvement and participation in its operations.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origins in programs and activities receiving federal financial assistance. Under federal regulations, transit operators must take reasonable steps to ensure persons have access to their activities and programs. Public participation opportunities, already provided to the public in English, should also be made accessible to persons who have a limited ability to speak, write, read, or understand English.

### **A. PURPOSE OF THE PUBLIC PARTICIPATION PLAN**

This Plan attempts to identify all minority, low-income, and Limited English Proficient (LEP) populations located within the NCTPA service area. The Plan describes existing outreach methods that are used to communicate NCTPA programs and services to the public. It also addresses strategies that can be applied to increase the involvement of traditionally underrepresented or underserved groups in order to develop more inclusive plans for the future.

### **B. SUMMARY OF PLAN DEVELOPMENT**

To assist in the preparation of this report, NCTPA conducted interviews with agency staff to gain an understanding of how inclusivity is currently incorporated in the planning process. The agency also engaged a wide array of community groups to identify key concerns among the distinct populations in the region. For a list of community groups that were contacted, see Appendix A. This effort also included an attempt to thoroughly account for all minority and low-income populations served by NCTPA. As described in the 2013 Language Assistance Plan developed by NCTPA (see Appendix B), the agency will perform an on-board survey in the spring of 2014 to assess the frequency of employees' contact with minority, low-income, and other disadvantaged individuals and identify any existing barriers to effectively serving those populations. Plans exist to conduct additional interviews with operations, customer service, and dispatch staff in the future.

## 2. NAPA COUNTY PROFILE

### A. COMMUNITIES

NCTPA serves all of Napa County. This includes connections to portions of Solano County (Fairfield, Suisun, and Vallejo) and the BART Station in the City of El Cerrito. According to the most recent US Census figures for Napa County, the total population was estimated to be 136,484 residents. The City of Napa has the largest population, followed by the cities of American Canyon, St. Helena, Calistoga and Yountville respectively.

In addition to the five incorporated cities and towns listed above, there are several unincorporated communities within Napa County whose residents also depend on NCTPA to meet their many and diverse transportation needs:

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

### B. DEMOGRAPHICS

NCTPA reviewed Census maps and data for Napa County in order to establish context for this PPP. According to the data available, the majority of Napa County residents identify themselves as Caucasian. A significant percentage of the local population identified as Hispanic or Latino, with a smaller number of respondents identifying as Asian, African American, or more than one race. According to a recent study<sup>2</sup>, “immigrants are contributing to very rapid demographic change in Napa County, particularly in the urban areas in southern Napa County and Calistoga. This demographic shift is most evident in the student and young working-adult populations.” Nearly one-third of Napa County residents identify themselves as Hispanic or Latino, and another 6.8% identify as Asian. Small enclaves of ethnically and culturally-diverse groups, such as Sikhs, Filipinos, and Native Americans live within NCTPA’s service area, in addition to a significant population of year-round agricultural workers. Given the predominance of undocumented immigrants working in agricultural labor, these numbers may underestimate the actual number of minority populations residing and working in Napa County.

A breakdown of the racial demographics in Napa County, as measured during the 2010 U.S. Census, are shown in **Table 1** below:

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<sup>2</sup> “Profiles of Immigrants in Napa County”, Migration Policy Institute, May 2012, [www.migrationpolicy.org/pubs/napa-profile](http://www.migrationpolicy.org/pubs/napa-profile)

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

(Source: US Census, 2010 Napa County Demographic Profile Data)

<b>Total Population</b>	136,484	
<b>One Race</b>	130,904	95.9%
<b>White</b>	97,525	71.5%
<b>Black or African American</b>	2,668	2.0%
<b>American Indian or Alaska Native</b>	1,058	0.8%
<b>Asian</b>	9,223	6.8%
<b>Native Hawaiian or Other Pacific</b>	372	0.3%
<b>Two or more Races</b>	5,580	4.1%
<b>Hispanic or Latino (of any race)</b>	44,010	32.2%

Outside of the Napa County service area, Hispanic or Latino peoples comprise approximately 26% of the population in the Solano County cities of Fairfield and Suisun.

**C. LANGUAGE**

In Napa County, approximately 83% of the population speaks English “very well” according to U.S. Census standards. This figure includes both native English speakers and speakers of multiple languages. Of the total population, 34% of all people speak a language other than English. Approximately half of those people, or 17%, are considered to speak English “less than very well.” These communities are the focus of this study. **Table 2** shows a numerical breakdown of languages spoken at home in Napa County.

**Table 2: Language Spoken at Home in Napa County**

(Source: US Census Bureau, American Community Survey 2007-2011, Napa County)

<b>Speak English Very Well</b>	83%
<b>Speak English Less Than Very Well</b>	17%
<b>Speak only English</b>	65.9%
<b>Speak a language other than English</b>	34.1%
<b>Spanish or Spanish Creole</b>	26.7%
<b>Other Indo-European languages</b>	2.7%
<b>Asian and Pacific Island languages</b>	4.4%
<b>Other languages</b>	0.3%

Please see the NCTPA’s 2013 Language Assistance Plan for Limited English Proficient (LEP) Populations (Appendix B) for more information.

**D. ECONOMIC CHARACTERISTICS**

The U.S. Census Bureau studied labor patterns in Napa County between 2007 and 2011. According to this study, there are approximately 63,450 people employed in Napa County. Of these workers, 1.4% were identified as relying on public transportation to commute to work. This figure is below the state’s average of 5.1%, and may represent an opportunity for NCTPA to increase its transit ridership.

There are approximately 49,640 households in Napa County. An analysis of income per household is presented in **Table 3**. A map of Napa County mean income is shown in **Figure 1**.

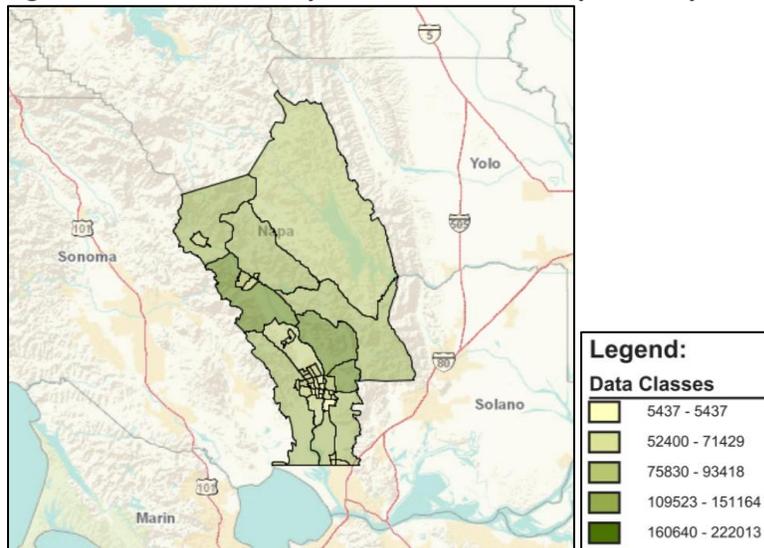
**Table 3: Household Income in Napa County**

(Source: US Census Bureau, American Community Survey 2007-2011, Napa County)

Total Households	49,640	
Less than \$10,000	1,547	3.1%
\$10,000 to \$14,999	2,132	4.3%
\$15,000 to \$24,999	4,034	8.1%
\$25,000 to \$34,999	3,985	8.0%
\$35,000 to \$49,999	6,568	13.2%
\$50,000 to \$74,999	8,754	17.6%
\$75,000 to \$99,999	6,082	12.3%
\$100,000 to \$149,999	8,465	17.1%
\$150,000 to \$199,999	3,714	7.5%
\$200,000 or more	4,359	8.8%

Napa County has an average (mean) income of \$94,894, which is nearly \$10,000 higher than the state average of \$85,148. Also, the rate of poverty, i.e. the percentage of total households with an income below \$35,000, is 6.7%. This figure is below the California average of 10.8% of all households.

**Figure 1: Mean Income by US Census Tracts, Napa County, 2011**

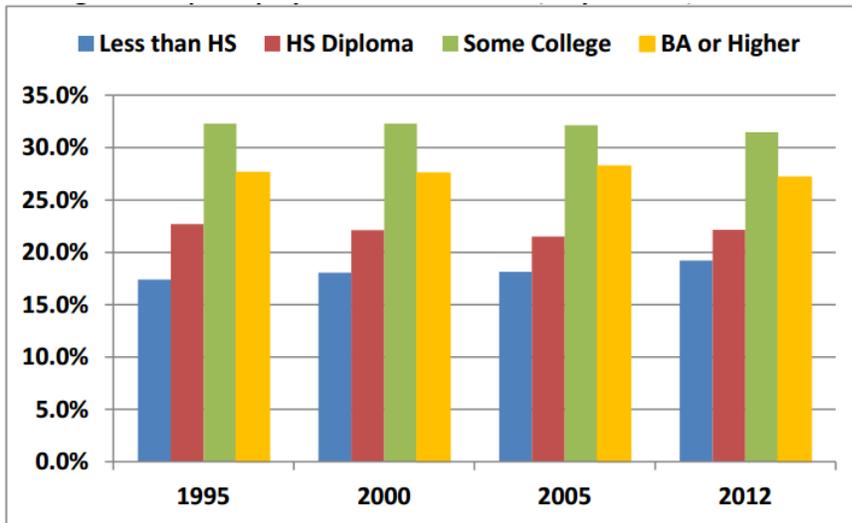


## E. TRADITIONALLY UNDERSERVED COMMUNITIES

To determine which communities qualify for consideration as low-income and minority populations, NCTPA analyzed U.S. Census Data and established partnerships with local community-based organizations and city and county agencies that serve these populations. NCTPA acknowledges that sub-groups exist within traditionally underrepresented ethnic and income groups (e.g. individuals who are mentally or physically handicapped or homeless, etc.) and makes a reasonable effort to serve those sub-groups, as resources and staff permit. Agricultural laborers in Napa County are reported to have lower levels of formal education, as well as limited English proficiency and other cultural and socio-economic

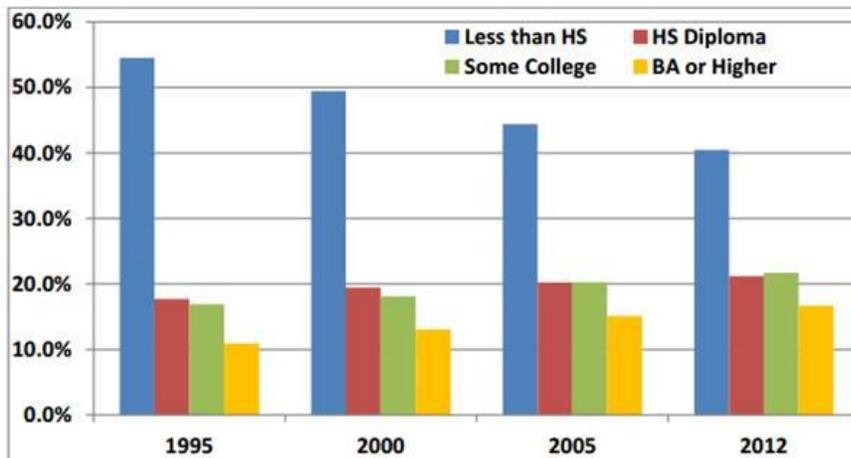
barriers that may prohibit access to information and services. **Figure 2** shows the education level of Napa County workers during select years between 1995 and 2012. **Figure 3** shows the education level of Napa County Vineyard Workers between the years of 1995 and 2012.

**Figure 2: Napa County Employment Education Level, 1995 - 2012**



Source: QWI ([http://lehd.ces.census.gov/applications/qwi\\_online/](http://lehd.ces.census.gov/applications/qwi_online/))

**Figure 3: Napa County Vineyard Jobs and Education Level, 1995 - 2012**



Source: QWI ([http://lehd.ces.census.gov/applications/qwi\\_online/](http://lehd.ces.census.gov/applications/qwi_online/))

### **3. OPPORTUNITIES AND CHALLENGES FOR PUBLIC PARTICIPATION**

#### **A. INTRODUCTION**

The NCTPA faces a wide range of socio-economic challenges and ethnicity-based differences in meeting the needs of Napa County residents and visitors classified under Title VI regulations. Napa County's unique agricultural heritage and reputation attract people from every part of the world. Napa County is becoming more ethnically diverse and beginning to more closely reflect regional population patterns. Many people in Napa County are employed in the wine and hospitality industries, including many agricultural laborers. The interconnections that exist between industries in Napa County, such as between the wine and hospitality industries, also extend to, and have economic impacts on, other businesses and residents of Napa County. The wine industry continues to use an increasing amount of contract labor from third parties outside Napa, which is not reflected in the U.S. Census Bureau statistics for the area or their estimates for reliance on public transportation by this segment of the population.

#### **B. TARGET POPULATION AND NEEDS**

Vineyard workers in Napa County have been identified as predominantly Hispanic or Latino and relatively young. Along with their extended families, these laborers represent a growing audience for the NCTPA's Title VI community outreach efforts. Farmworker Housing Centers, churches, schools and community organizations serving the local Hispanic or Latino community, are provided with copies of translated NCTPA materials and information on how to access Spanish-speaking staff or translators. Ongoing outreach to other ethnically, culturally or economically-disadvantaged groups throughout Napa County is maintained through regular contact with representatives from community based organizations (CBOs) and local agencies that serve these populations. Specific methods used for outreach to LEP individuals are also outlined in NCTPA's 2013 Plan for Language Assistance (Appendix B).

Several current studies<sup>3</sup> indicate that the average age of employees outside of agriculture, both in and out of Napa County, is shifting to relatively older workers. This is particularly true for many hospitality industry employees. Napa County has a significant senior population, many of whom live on fixed incomes and have limited access to transportation due to economic, geographic, or physical limitations.

#### **C. PARTNERSHIPS WITH COMMUNITY BASED ORGANIZATIONS (CBOs)**

NCTPA has identified and maintains contact with a network of representatives from local Community Based Organizations (CBOs), non-profit, faith-based and volunteer groups, health care, legal aid and social service agencies, educators and administrators. The agency relies on these groups to provide input and feedback on their programs and services, as well as to disseminate information to the populations served by or involved with these groups and organizations. Enhanced outreach to these groups includes regular distribution of bilingual (Spanish and English) collateral materials with current

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<sup>3</sup> "The Labor Market in Napa County, California: Opportunities and Challenges for the Wine Industry", IMPACT Napa Conference, North Bay Business Journal, August 29, 2013, <http://www.northbaybusinessjournal.com/wp-content/uploads/Robert-Eyler-economics-presentation-for-Impact-Napa-2013.pdf>; "Economic Opportunity and Workforce Development in Napa County", Prepared for the Napa County Workforce Investment Board, September 2010, [www.napaworkforce.org/portals/3/downloads/report/NapaEconRpt10.pdf](http://www.napaworkforce.org/portals/3/downloads/report/NapaEconRpt10.pdf); "Profiles of Immigrants in Napa County", Migration Policy Institute, May 2012, [www.migrationpolicy.org/pubs/napa-profile](http://www.migrationpolicy.org/pubs/napa-profile)

route and scheduling information, as well as updates on new programs and services provided by telephone, email, website links and social media posts.

#### **D. TRANSLATION AND INTERPRETIVE SERVICES**

NCTPA continues to enhance its efforts to provide equal access to low-income, minority and LEP populations. This is accomplished by translating website pages; distributing route schedules, reports and other agency materials; and making translation services more widely available at public venues and community events.

### **4. PUBLIC PARTICIPATION STRATEGIES**

#### **A. INTRODUCTION**

Effective public participation strategies utilize a variety of methods to engage the greatest number of people. NCTPA continually strives to meet this strategic objective with existing staff and other resources. The following factors guide NCTPA staff in the design and implementation of public participation strategies:

- Size and/or scale of the plan or project (regional or county-wide, neighborhood level, etc.)
- Level of potential impacts, including social, economic and environmental impacts

#### **B. EXISTING NCTPA OUTREACH**

NCTPA has and will continue to use a broad array of communication tools and resources to reach out to Napa County residents, businesses, CBOs, service agencies, neighborhood and community groups, visitors, commuters and other potential transit users groups, all of which have the potential to include Title VI-qualifying communities. Some of the tools and methods used by NCTPA to effectively disseminate information to Title VI groups and the larger community include:

- Implementing the language assistance measures outlined in the 2013 NCTPA Plan for LEP Populations (Appendix B)
- Translation of NCTPA key website pages, documents and reports
- Making translators available at public meetings and events
- Using translation services for responses to individual public requests and service inquiries
- Including contact information for translation requests on all printed material
- Use of local bilingual radio, television and newspaper advertising
- Distribution of translated or bilingual collateral materials to local CBOs and community agencies
- Use of social media tools and resources
- Participation in local community events
- Hosting of public meetings at appropriate community venues

#### **C. RECOMMENDED STRATEGIES**

Pursuant to Title VI regulatory guidance, NCTPA will continue to take reasonable steps to provide meaningful access to underserved populations identified within their service area. This includes ongoing

efforts to improve access and opportunities for involvement in the identification of social, economic, and environmental impacts of proposed transportation decisions and programs. All public participation activities normally provided in English will continue to be made available to low-income, minority and LEP populations, using the methods and tools deemed most effective for reaching those audiences, including:

- Continued implementation of the 2013 NCTPA Plan for LEP Populations and training for NCTPA operations and customer service staff on key plan components
- Expanded use of local and regional bilingual radio, television and newspaper advertising
- Continued use of translators and translated materials
- Expansion and continued use of the NCTPA's contact database of CBO and other community-focused organizations to maintain open communication, provide input and receive feedback
- Increased use of graphic signage and visually enhanced materials
- Increased use of website applications, posting of website notices and links to information
- Continued posting and distribution to local CBOs, churches, schools, libraries, cultural and community centers and service agency representatives of bilingual flyers, postcards and brochures
- Increased participation in community events
- Continued hosting of public meetings

NCTPA also plans to distribute copies of the agency's Public Participation Plan in English and Spanish. In addition, NCTPA will draft and implement project-specific public participation plans for any major projects or initiatives conducted by the agency. These plans will take into account the audiences affected by the project or initiative, their communication needs, as well as the strategies listed above.

## **5. PERFORMANCE METRICS AND GOALS**

### **A. MONITORING AND RECORDING**

NCTPA is committed to accountability and transparency throughout its operations. NCTPA staff will continue to monitor and track public participation methods and make the results of those efforts available for review. Complaints, comments, and suggestions from Title VI individuals or groups will be monitored and tracked by designated NCTPA staff.

NCTPA has collected some existing information about the reach and effectiveness of its current methods and will continue to expand and use that information to improve access, programs and services. Some of the measurable objectives that the NCTPA currently tracks or will implement as resources permit, include:

- Regular updates to contacts in the community partners database and outreach to low-income, minority and LEP individuals
- Tracking the number and type of Title VI participants attending NCTPA public meetings and events

- Tracking the number and percentage of comments or feedback received in languages other than English
- Analyzing website statistics, webpage downloads and time spent on key webpages
- Tracking internal (staff) and external (transit users) survey results
- Tracking the number and type of Title VI public inquiries that the NCTPA staff receive via phone, email and in-person visits

## **B. PUBLIC PARTICIPATION OUTCOMES**

The Title VI Public Participation Plan is designed to identify opportunities for greater community involvement through implementation of thoughtful outreach methods and all tools available. These strategies will be applied with the goal of engaging the greatest possible number of residents and visitors, based on available resources and recognition of the unique characteristics, strengths and challenges of the Napa County transportation service area.

As NCTPA increases its efforts to solicit involvement from these Title VI-qualifying communities, the agency hopes to see increased engagement from diverse community members. Ongoing engagement and participation will foster a two-way dialogue between transit providers and transit users, leading to improved efficiency and service. NCTPA will be able to better serve its customers and its customers will realize greater benefits from the use of NCTPA's services.

## APPENDIX A

### Community Groups Contacted for the Language Assistance Plan

- American Canyon Family Resource Center
- Boys & Girls Clubs of Napa Valley
- Napa County Hispanic Network
- Napa Valley Adult School
- Napa Valley College
- Napa Valley Community Housing (Mayacamas Village)
- Napa Valley Non-Profit Coalition
- Puertas Abiertas
- Somos Napa
- VOICES (Voice Our Independent Choices for Emancipation)

## APPENDIX B

# Language Assistance Plan for Napa County Transportation and Planning Agency

### Introduction

NCTPA serves as the congestion management agency and public transit provider for the jurisdictions in Napa County, and is one of the nine Bay Area counties within the Metropolitan Transportation Commission (MTC) region. NCTPA's service area includes a population of some 139,000 residents in over 740 square miles of land, consisting mostly of smaller, rural communities and agricultural land. The service area is diverse, with large numbers of residents speaking a language other than English as their primary means of communication.

Individuals who have a limited ability to read, write, speak or understand English are considered to be limited English proficient, or "LEP." In compliance with guidance and rules issued by the U.S. Department of Transportation, and Title VI of the Civil Rights Act of 1964, NCTPA has taken reasonable steps to ensure that all persons have meaningful access to its programs, services, and information, at no additional cost. This includes the following plan for LEP persons within NCTPA's jurisdiction.

A Language Assistance Plan starts with an assessment to identify LEP individuals who need assistance. NCTPA will perform an on-board rider survey in the spring of 2014 and the survey results will be available in summer 2014. NCTPA also plans to conduct internal surveys with transit operators, dispatch, customer service and ticket sales staff, regarding frequency of contact with LEP individuals or groups. Once the assessment is complete, the Language Assistance Plan is drafted and adopted by the agency.

Implementation of the Language Assistance Plan includes the development of language assistance measures, staff training, notification measures to LEP individuals, and monitoring and updating of the plan on a yearly basis.

### Purpose

The purpose of this Language Assistance Plan (hereinafter "plan") is to ensure members of the public have access to public information and services provided by NCTPA and to meet Federal Transit Administration's (FTA) requirements to comply with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin. As a subrecipient of FTA funds, NCTPA is required to take reasonable steps to provide meaningful access to its transit services for persons who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. The FTA refers to these persons as Limited English Proficient (LEP) persons.

The U.S. DOT's FTA Office of Civil Rights' publication "*Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons – A Handbook for Public Transportation Providers*" was used in the preparation of this plan.

## Contents

This plan contains:

- A. A needs assessment based on the four-factor analysis
- B. Language assistance measures
- C. Staff training plan
- D. Methods for notifying LEP persons about available language assistance
- E. Methods for monitoring, evaluating and updating plan

## A. LEP Needs Assessment – the Four-Factor Analysis

### Determination of Need

In order to prepare this Plan, NCTPA implemented the U.S. Department of Transportation’s four factor LEP analysis, which considers the following:

1. The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population
2. The frequency with which LEP persons come in contact with NCTPA programs, activities or services
3. The Importance to LEP Persons of NCTPA’s Program, Activities and Services
4. The resources available to NCTPA and overall cost to provide LEP assistance

### ***Factor 1: Number and proportion of LEP persons served or encountered***

NCTPA used the American Community Survey (ACS) 5 Year survey data for 2007-2011 for Limited English Proficient (LEP) Populations in Napa County to estimate the number or proportion of LEP persons who might use or want to use NCTPA’s services.

The American Community Survey (ACS) 5 Year survey data identifies people who speak English “less than very well” as Limited English Proficient persons. The survey data is broken down by the languages spoken at home, and by ability to speak English, for persons five years of age and older, with number and percentage broken out by county. For Napa County, the ACS data indicates that approximately half of the residents identified as speaking a “language other than English”, and whose primary language is categorized as “Spanish or Spanish Creole”, were identified as speaking English “less than very well”. The ACS study data also indicates that nearly 40% of the Asian and Pacific Islanders in Napa County speak English “less than very well”.

2007-2011 American Community Survey  Language Spoken at Home	Total		Percent of specified language speakers			
			Speak English "very well"		Speak English less than "very well"	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	127,288	+/-76	83.5%	+/-1.0	16.5%	+/-1.0
Speak only English	65.9%	+/-1.1	(X)	(X)	(X)	(X)
Speak a language other than English	34.1%	+/-1.1	51.7%	+/-2.5	48.3%	+/-2.5
Spanish or Spanish Creole	26.7%	+/-1.0	47.6%	+/-3.0	52.4%	+/-3.0
Other Indo-European languages	2.7%	+/-0.4	80.6%	+/-5.3	19.4%	+/-5.3
Asian and Pacific Island languages	4.4%	+/-0.4	58.2%	+/-5.3	41.8%	+/-5.3
Other languages	0.3%	+/-0.1	66.3%	+/-14.1	33.7%	+/-14.1
<b>SPEAK A LANGUAGE OTHER THAN ENGLISH</b>						
Spanish or Spanish Creole	33,979	+/-1,234	47.6%	+/-3.0	52.4%	+/-3.0
5-17 years	8,954	+/-586	69.2%	+/-5.5	30.8%	+/-5.5
18-64 years	23,481	+/-860	39.8%	+/-3.1	60.2%	+/-3.1
65 years and over	1,544	+/-152	39.7%	+/-11.0	60.3%	+/-11.0
Other Indo-European languages	3,419	+/-555	80.6%	+/-5.3	19.4%	+/-5.3
5-17 years	314	+/-148	87.9%	+/-15.9	12.1%	+/-15.9
18-64 years	2,261	+/-446	82.1%	+/-7.5	17.9%	+/-7.5
65 years and over	844	+/-204	73.9%	+/-10.1	26.1%	+/-10.1
Asian and Pacific Island languages	5,649	+/-476	58.2%	+/-5.3	41.8%	+/-5.3
5-17 years	715	+/-183	68.3%	+/-14.6	31.7%	+/-14.6
18-64 years	4,054	+/-355	63.0%	+/-6.0	37.0%	+/-6.0
65 years and over	880	+/-152	28.2%	+/-13.2	71.8%	+/-13.2
Other languages	365	+/-166	66.3%	+/-14.1	33.7%	+/-14.1
5-17 years	65	+/-90	58.5%	+/-22.3	41.5%	+/-22.3
18-64 years	242	+/-107	71.9%	+/-18.9	28.1%	+/-18.9
65 years and over	58	+/-45	51.7%	+/-37.1	48.3%	+/-37.1
<b>CITIZENS 18 YEARS AND OVER</b>						
All citizens 18 years and over	87,477	+/-993	92.5%	+/-0.8	7.5%	+/-0.8
Speak only English	78.7%	+/-1.0	(X)	(X)	(X)	(X)
Speak a language other than English	21.3%	+/-1.0	65.0%	+/-3.3	35.0%	+/-3.3
Spanish or Spanish Creole	14.5%	+/-0.9	63.8%	+/-4.2	36.2%	+/-4.2
Other languages	6.8%	+/-0.5	67.5%	+/-4.3	32.5%	+/-4.3

- The ACS data above estimates the total population of the NCTPA Napa County service area to be: 127,288.
- The ACS data above estimates the total number of people who speak a language other than English in the NCTPA Napa County service area is estimated to be: 43,405 or 34.1% of the population.
- The ACS data above estimates the total number of LEP persons (those who speak English less than “very well”) in the NCTPA Napa County service area is estimated to be: 21,702 or 17% of the population.

**Factor 2: Frequency of LEP populations’ contact with existing programs, activities, and services**

Statistical data regarding individual requests from LEP persons will be tracked as resources permit; however since several transit routes serve Napa County social service and non-profit agencies, it is likely that NCTPA is providing services to many LEP individuals.

The main language spoken by LEP individuals within the NCTPA service area is primarily Spanish.

**Factor 3: Importance to LEP population of programs, activities, and services**

NCTPA considers public transit to be an important and essential service for many residents, commuters, and visitors in the local service area. This includes local buses and buses servicing neighboring counties and the regional BART system, paratransit, and services for seniors. These services are used by people from all walks of life, including commuters, students, visitors, the elderly, and those with limited mobility.

**Factor 4: Resources available to NCTPA and overall cost to provide LEP assistance**

NCTPA makes every reasonable effort to communicate with LEP persons about available transit services, including providing the funding for translation of current services and bilingual materials. As resources permit, NCTPA will include training for all drivers on best practices for serving LEP individuals.

In addition to using a translation service, NCTPA recently hired additional Spanish-speaking staff at the ticket desk to better serve LEP individuals. NCTPA has also translated key website pages into Spanish.

In an effort to better serve the transit service needs of its users, NCTPA recently completed construction of its new Transit Center facility. The expanded facility will allow NCTPA to better market and communicate its transit services and serve the needs of the traveling public, including those of LEP populations.

NCTPA works with many advocacy groups serving LEP individuals to gain insight regarding their needs and concerns about local transit services. This includes Napa County Department of Health and Human Services, Community Action Napa Valley, SOMOS Napa, Hispanic Network, Non-profit Coalition, and Legal Aid of Napa Valley. NCTPA is continually exploring options for the best methods of delivering information and meeting the transit needs of all LEP persons and Napa County residents. NCTPA undertook significant Spanish-language outreach during its Agricultural Worker Vanpool Program and continues to expand community outreach efforts agency-wide.

**B. Language Assistance Measures**

Language measures currently used and planned to be used by the NCTPA transit system to address the needs of LEP persons include the following:

- Translating key documents in the following language(s): Spanish (other languages as needed)
- Translating key website pages
- Coordination of Oral and Written Translation Services

Communication with LEP advocacy groups about transit services

Increased use of signage with graphic visual images and pictograms to promote universal understanding

Posting of bilingual notices informing LEP persons of available services

Other (description of services): training new residents on how to use transit system

### **C. Staff Training**

To ensure effective implementation of this plan, NCTPA will schedule orientations for new staff and annual training for all employees whose position requires regular contact with the public. Training will include a review of this plan and how to handle verbal requests for transit service in a language other than English.

### **D. Notice to LEP Persons about Available Language Assistance**

NCTPA will notify LEP individuals about the language assistance services available to them without cost by using the following methods:

Brochures

Sending information to local organizations serving LEP populations

Website notices

Including contact information for translation requests on all printed materials

Posting of bilingual flyers at libraries, churches, schools, cultural and community centers

Audio programs and radio ads

Participation in local community events

### **E. Monitoring, Evaluating and Updating Plan**

NCTPA staff will review this plan annually, including:

- Assessing the sufficiency of staff training and budget for language assistance,
- Reviewing current sources for assistance to ensure continuing availability, and
- Reviewing any complaints, comments and suggestions from LEP persons, or agencies serving LEP populations, received during the past year.

**Annual plan revisions will be approved by the agency's Executive Director and dated accordingly.**

## **F. Dissemination of Plan**

This plan is available on the NCTPA website at [www.nctpa.net](http://www.nctpa.net).

This plan is also available at no cost in English or Spanish upon request by telephone, fax, U.S. Postal Service mail, e-mail, or in person at the NCTPA office.

## **G. Contact Information**

Questions or comments about this plan may be submitted to:

Napa County Transportation and Planning Agency  
ATTN: Civil Rights Officer  
625 Burnell Street  
Napa, CA 94559  
(707) 259-8631  
(707) 259-8638



# TITLE VI Compliant Form

Title VI of the Civil Rights Act of 1964 states "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

*Title 42 U.S.C. Section 2000d*

Please provide the following information necessary in order to process your complaint. A formal complaint must be filed within 180 days of the occurrence of the alleged discriminatory act. Assistance is available upon request. Please contact NCTPA at (707) 259-8631.

Complete this form and return to:

Program Manager-Human Resources, Civil Rights and Board Secretary  
Napa County Transportation and Planning Agency  
625 Burnell Street  
Napa, CA 94559

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Complainant's Name:

Address:  City:

State:  Zip Code:

Telephone (Home):  (Work):

Person(s) discriminated against (if other than complainant)

Name:

Address:  City:

State:  Zip Code:

Telephone (Home):  (Work):

What is the discrimination based on?

- Race/Color       National Origin       Sex       Disability
- Low Income       Limited English Proficiency

Date of the alleged discrimination:  Location:

Agency or person that who was responsible for alleged discrimination:

Describe the alleged Discrimination. Explain what happened and whom you believe was responsible (for additional space, attach additional sheets of paper to this form.

List names and contact information of persons who may have knowledge of the alleged discrimination.

How can this complaint be resolved? How can the problem be corrected?

Please sign and date. The complaint will not be accepted if it is has not been signed. You may attach any written materials or other supporting information that you think is relevant to your compliant.

Signature

Date

## SERVICE STANDARDS AND DESIGN

### PURPOSE

To accomplish the goal of providing efficient and effective service to the residents of Napa County, the Agency has developed a series of service standards that provide a framework for service allocation as well as measures to continually examine the service to ensure that services meet efficiency and effectiveness standards in accordance with stated objectives. Additionally, these standards are also a requirement of Title VI of the Civil Rights Act of 1964 in order to ensure that service is allocated and assessed without regard to race, color, or national origin.

### SERVICE DEFINITIONS

A matrix depicting the service standards and goals for the various types of service is contained in Attachment 1 to this policy. The section below provides a definition for each service type operated by NCTPA:

Local – These are the services operating on corridors where residential densities are approximately 4,000 to 5,000 residents per square mile (or comparable commercial densities). These routes operate along the arterial streets as well as local or residential roads, and provide the highest level of service due to the general mobility needs within the urbanized area.

Regional - Provides inter-city service along arterials, highways or freeways to major focal points, destinations and trip attractors. These routes provide connections to regional rail or other transportation options and may include express-type services. Service features wide stop-spacing or areas with closed door operation (most often on the freeway). Underlying local service operating on similar roads also contributes to a greater aggregate service frequency during operating hours.

Community Circulators – These are primarily routes operating in areas of very low density (fewer than 4,000 residents per square mile). Provide service that operates to focal points within the community.

City Dial a Ride – Demand responsive service provides a more flexible operation than traditional fixed route services for areas of very low density where fixed route service may not be warranted. These are services such as those that serve designated areas within the two cities of Calistoga and Yountville. There are largely no service standards for these services, as they are generally based on each city's financial contribution toward the operation.

**DENSITY STANDARDS**

To ensure that the service is able to be both cost efficient and useful, areas with higher density of population or commercial development should be allocated service that is more frequent, with routes and bus stops spaced closer together, and that operates more consistently throughout the day. Within each service category, service will be allocated primarily on the basis of demand or use, provided that minimum service levels are provided.

Service Span refers the number of hours that the service operates on any given day. It is generally indicated with beginning and end periods. However, this may be changed based on demand for earlier or later service to meet specific needs of the community.

For example, within the Local Service category, service will be provided at a minimum of every 30 minutes for at least 11 hours a day for every day except Sunday. More frequent service allocation will be provided on the basis of a combination of demand for service and density.

Route Spacing refers to the general availability of routes within the service area. For Regional routes, due to the nature of operation and design of the service, gaps between routes may be greater than a mile. For local routes, spacing is generally closer and follows the grid of the city.

**Table 1: Density, Frequency and Service Span Standard**

Persons per Square Mile	Service Type	Route Spacing	Route Structure	Weekday Frequency Standard	Service Span
4,000 – 5,000 (Medium Density) [such as urban area of Napa]	Local	½ mile	Modified Grid	30 minutes Peak 60 minutes off peak	7 am to 7 pm (Monday to Saturday)
3,000 – 4,000 (Low Density)	Community	½-1 mile	Focal Point	45 minutes Peak 90 minutes off peak	7 am to 5 pm (Monday to Friday)
3,000 – 4,000 (Low Density)	Regional	½-1 mile	Focal Point	120 minutes Peak No Midday Service	6 am to 7 pm (Monday to Friday)
3,000 and below	City Dial A Ride	N/A	Focal Point	No Standard	No Standard

## VEHICLE LOAD STANDARDS

A Vehicle Load Factor is the ratio of the number of seats on a vehicle to the number of passengers on-board. Load factor is an indicator of the extent or probability of overcrowding, and may indicate the need for additional vehicles to maintain useful service.

The Load factor is determined by taking the number of passengers on a specific trip that pass the peak load point during the peak hour, and dividing that number by the number of seats on the bus during that trip.

Load factors can vary by service type and can take into consideration both customer expectation and customer trip length in determining the correct load factor. For instance, for longer distance Regional services, a load factor of 1.0 (no standees) is considered optimal, as riders may be reluctant to ride if they do not have a seat for such a long trip.

Different Vehicle Load thresholds shall be used to measure service effectiveness or to determine remediation. The following thresholds shall be monitored, as reflected in Table 2:

**Table 2: Vehicle Load Factor by Route Type**

Route Type	Vehicle Load Factor
Local	1.25 (25% standees)
Regional (Urban)	1.00 (no standees)*
Regional (Rural)	1.00 (no standees)*
Community	1.25 (25% standees)

\*For purposes of measuring the Vehicle Load Factor for Regional Service, the Vehicle Load Factor shall be measured as the route enters the “non-revenue area” and is operating closed-door, which is generally on the freeway or highway.

## SERVICE AVAILABILITY

Service availability refers to the general measure of how the routes are distributed within the NCTPA service area. It can be defined as a measure of the distance a person must travel to gain access to transit service.

NCTPA fixed route bus service will serve 85% of the dwelling units within the urbanized area of Napa County within one quarter mile. 90% of the major activity centers will be within one quarter mile of a bus route.

### ON-TIME PERFORMANCE

For all fixed route services, regardless of service type, 90% of service will operate on time (between 0 minutes early and 5 minutes late). For City Dial a Ride (demand responsive) 90% of the service will arrive within 30 minutes of call requesting pick up.

### PASSENGER PER HOUR

In order to account for Regional service, which can sometimes operate closed-door for large portions of the route, the standards for passenger activity assumes that closed door portions of the route will not be counted toward overall passengers per hour. This way, a route that operates closed door (without the ability to pick up passengers) for a large percentage of the route will not be identified for poor performance. Table 3 presents the following thresholds that should be monitored:

**Table 3: Passenger Activity by Route Type**

Route Type	Passenger Activity
Local	12 passengers per hour
Regional (Urban)	7 passengers per hour
Regional (Rural)	5 passengers per hour
Community	5 passengers per hour
City Dial a Ride	2 passengers per hour

### FAREBOX RECOVERY RATIO

Farebox recovery ratio is an efficiency metric that gauges the amount of cost that is covered by passenger fares. In certain instances, outside funding can be used to supplant passenger fares, as is the case of the City Dial a Ride services. Table 4 presents the farebox recovery standard by service type.

**Table 4: Farebox Recovery Ratio**

Route Type	Farebox Recovery Ratio
Local	Meet or exceed 17%
Regional (Urban)	Meet or exceed 17%
Regional (Rural)	Meet or exceed 15%
Community	Meet or exceed 10%
City Dial a Ride	Meet or exceed 10%

### TRANSIT AMENITIES

Transit amenities are those items installed by NCTPA that provide improvements to the traditional bus stop pole and sign. This includes shelters, canopies, benches or other betterments intended to provide comfort or convenience to the rider. In 2012, NCTPA

completed a project that prioritized locations for bus stop improvements followed by implementation.

Future implementation of amenities will be based upon availability of funding for improvements, while prioritizing services that operate at 60 minutes or worse at stops with the greatest number of riders per day.

### **APPLICATION OF STANDARDS**

To determine service effectiveness, staff will conduct ridership analyses on a regular basis. This information will be used to determine evaluative components such as passengers per vehicle hour, vehicle load factor, passengers per trip and hour, and farebox recovery ratio.

An assessment of route performance within the service categories will be conducted annually to determine if corrective action is required. Minority Transit routes (those routes that have at least 1/3 of the total route mileage in a census tract with a percentage of minority population greater than the percentage of minority population in the service area) will also be identified in the evaluation in order to comply with federal Title VI Civil Rights guidance.

Service that falls below the standard for all routes within its category will be analyzed for the following:

- Schedule adjustments, if service frequencies exceed the standards provided in this Policy.
- Running time adjustments or minor route changes to improve efficiency or improve route performance.
- Route improvements, including route consolidation or through-routing to improve efficiency and effectiveness.
- Route discontinuance, should there be no other means to improve efficiency or provide a well-used transit product.
- Other actions, such as grant funded opportunities or targeted marketing, to improve route performance.

**Attachment 1: Service Standards**

Service Type	EFFECTIVENESS									PERFORMANCE / EFFICIENCY		
	Density	Peak and Base Frequencies*	Service Span*	Scheduling	Route Structure	Load Factor*	Vehicles	Stop Spacing	Stop Amenities*	Farebox Recovery	Passengers per hour	On-time Performance*
<b>Local</b> (Routes 1 through 11)	4,000 to 5,000 (Medium Density) [such as urban areas of Napa]	Not to exceed 30 minutes in the peak and 60 minutes midday	7 am to 7 pm (Monday to Saturday) 9 PM for valley-wide commuter routes.	Clock Headways preferred	Modified Grid: uses the lay out of the urban area	1.25	Standard 40' or smaller vehicle to meet load	1/4 to 1/2 mile depending on density	Shelters based on high ridership routes in areas with lower frequency	Meet or exceed 17%	12 passenger per hour	90% of service will operate on time (between 0 minutes early and 5 minutes late)
<b>Regional (Urban)</b> (Routes 20 & 29)	3,000 to 4,000 (Low Density)	Not to exceed 2 hours in the peak. No midday standard.	6 am to 7pm (Monday to Friday) 9 PM for valley-wide commuter routes.	Scheduled to meet regional connections	Focal Point: provides access between two focal areas to provide regional and intercity connectivity	1.00	Standard 40' or smaller vehicle to meet load	1/2 to 1 mile depending on density or trip generators and attractors (such as school, shopping, medical)	Shelters based on high ridership routes in areas with lower frequency	Meet or exceed 17%	7 passengers per hour	90% of service will operate on time (between 0 minutes early and 5 minutes late)
<b>Regional (Rural)</b> (Routes 25)	3,000 to 4,000 (Low Density)	Not to exceed 2 hours in the peak. No midday standard.	6 am to 7 pm (Monday to Friday)	Scheduled to meet regional connections	Focal Point: provides access to connect rural focal area and regional hubs	1.00	Standard 40' or smaller vehicle to meet load	1 to 2 mile depending on density or trip generators and attractors (such as school, shopping, medical)	Shelters based on high ridership routes in areas with lower frequency	Meet or exceed 15%	5 passengers per hour	90% of service will operate on time (between 0 minutes early and 5 minutes late)
<b>Community</b> (American Canyon and St. Helena)	3,000 to 4,000 (Low Density)	Not to exceed 45 minutes in the peak and 90 minutes midday	7 am to 5 pm (Monday to Friday) or based upon available funds	As required to meet demand	Focal Point: provides access between focal areas within a small community	1.25	30' vehicle or smaller	1/2 to 2/3 mile depending on density or trip generators and attractors (such as school, shopping, medical)	Shelters based on high ridership routes in areas with lower frequency	Meet or exceed 10%	5 passenger per hour	90% of service will operate on time (between 0 minutes early and 5 minutes late)
<b>City Demand Response</b> (Calistoga and Yountville)	3,000 and below	Upon call in, service will arrive within 15 - 30 minutes.	Service based upon available funds	As requested	No standard	No standard	30' vehicle or smaller	No standard	Shelter locations are responsibility of city partners	Meet or Exceed 10% (includes City or other sponsor funding)	2 passengers per hour	90% of service will arrive within 30 minutes of call in

\*Required by Title VI for Fixed Route Service Only

## GLOSSARY

### **Arterial Street**

A signalized roadway that primarily serves through-traffic and secondarily provides access to abutting properties. Signals are generally less than 2 miles apart.

### **Clock Headways**

The scheduled headway between vehicle trips that can be divided into sixty (60) evenly (e.g. 60, 30, 20, 15, 10 or 5)

### **Closed Door Operation**

Portions of Bus routes with one or more long segments in which no stops are made (e.g. while on freeway).

### **Demand Responsive Service**

Bus service that operates only when summoned by reservation by intending passengers.

### **Fixed Route Service**

Bus service that operates on a prescribed routing, stopping at prescribed stops and operating on a prescribed schedule.

### **Frequency**

The quantity of service on a route, usually described in terms of the number of buses per hour or the elapsed time between consecutive buses. The latter measure is also called the *headway*. The term *high-frequency* denotes many buses per hour, or small headways.

### **Grid Network**

A type of multi-destinational route structure. In a typical grid network, high-frequency routes operate on the length of east-west and north-south arterials, intersecting each other to form a grid pattern. This allows a passenger to travel from anywhere to anywhere else by a right-angle movement with at most a single transfer. Ideally, routes are spaced  $\frac{1}{2}$  mile apart so that everyone is in walking distance to both a north-south line and an east-west line. Since conditions rarely allow for an ideal grid, this concept is often called *modified grid*.

### **Headway**

Another term for frequency, referring to the elapsed time between consecutive buses on a route.

### **Load Factor**

The ratio of passengers on board a bus to the number of seats. The load factor is generally shown as an average over a period of time, usually 60 minutes.

**Minority Transit Route**

Routes that have at least 1/3 of the total route mileage with a percentage of minority population greater than the percentage of minority population in the service area

**Peak Period**

A period of increased transit service, generally during the morning and afternoon peak (“rush hour”) periods. Generally, peak periods are 6:00am to 9:00am and 3:00pm to 6:00pm.

**Revenue Service**

The time spent in scheduled service from the first timepoint of the day to the last timepoint of the day. Revenue

**Span of Service**

The total hours during which transit service is operated.

**Standard**

The acceptable level of performance; the rule for the measure or test of quality.

**Through-routing**

When a route designed to carry people to/from a downtown doesn't end in the downtown; instead, it flows across downtown and out the other side as a different route.

# Title VI Notice to Public

The Napa County Transportation & Planning Agency is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. It's objective to:

- Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin;
- Promote the full and fair participation of all affected populations in transportation decision making;
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;
- Ensure meaningful access to programs and activities by persons with limited English proficiency.

The Napa County Transportation & Planning Agency is committed to a policy of non-discrimination in the conduct of its business, including its Title VI responsibilities and to the delivery of equitable and accessible transportation services. Any person who believes that he or she has been subjected to discrimination under Title VI on the basis of race, color or national origin may file a Title VI complaint with Napa County Transportation & Planning Agency. Any such complaint must be in writing and submitted to the Napa County Transportation & Planning Agency within one hundred eighty (180) days following the date of the alleged discrimination.

There are several ways to file a complaint. Complaints may be filed in writing and mailed to Manager of Human Resources and Administration, Napa County Transportation & Planning Agency, 625 Burnell Street, Napa, CA 94558. A copy of the Title VI Complaint Form is available by calling (707) 259-8631 or (707) 259-8633 and at [www.nctpa.net](http://www.nctpa.net). We encourage use of the Title VI Complaint Form.