

Antelope Valley Transit Authority

Fiscal Year 2021

TITLE VI

Program Update



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Chapter 1: Introduction

1.1 TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

This document was written in response to Federal Transit Administration (FTA) Circular 4702.1A. FTA requires transportation agencies to demonstrate compliance with Title VI of the Civil Rights Act of 1964 (Title VI) by submitting a program update every three years.

Title VI ensures that “No person in the United States shall, on the basis 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 Title VI program update consists of supporting documentation that provides evidence of equitable distribution of services; promotion of full and fair participation in public transportation decision-making without regard to race, color, or national origin; and meaningful access to transit-related programs and activities by persons with limited English proficiency.

1.2 ANTELOPE VALLEY TRANSIT AUTHORITY

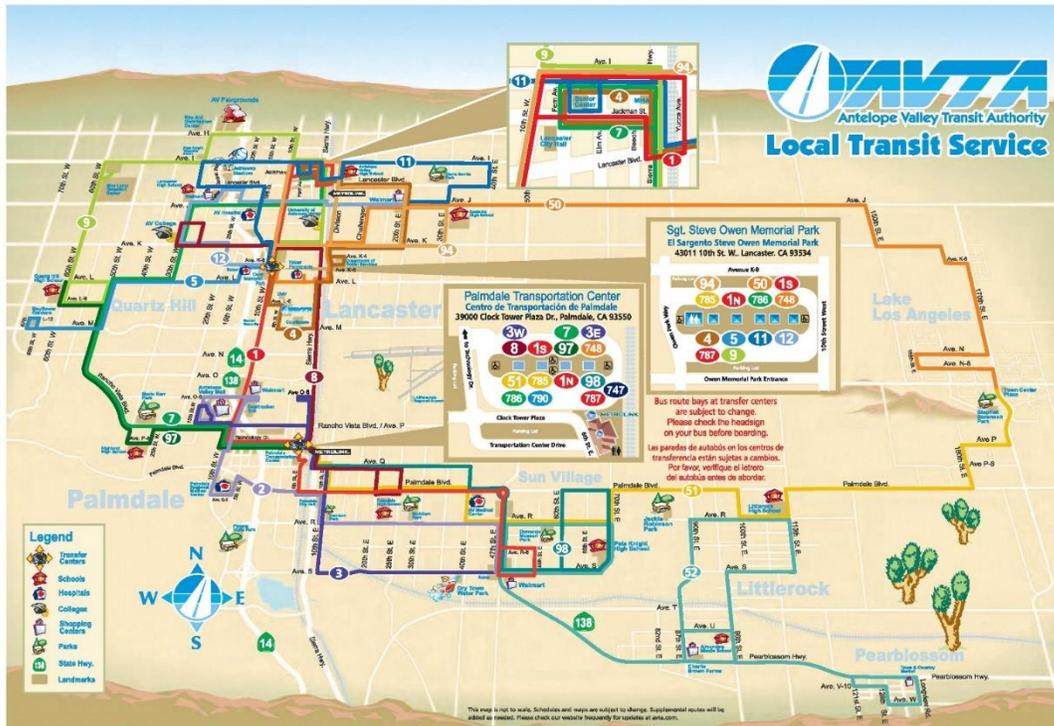
The Antelope Valley Transit Authority (AVTA) is a public entity created on July 1, 1992, pursuant to Section 6506 of the Government Code of the State of California. AVTA was formed under a Joint Exercise of Powers Agreement (JPA). Its members consist of the County of Los Angeles and the cities of Lancaster and Palmdale. The JPA members jointly contribute capital and operating funds to AVTA each year to assist in the provision of transit services to the Antelope Valley area.

The Antelope Valley Transit Authority (AVTA) is located in Southern California, approximately 70 miles north of Los Angeles. Its principal office and bus facility is situated in the City of Lancaster, California. AVTA was formed to provide and administer public transportation services for the citizens of Lancaster, Palmdale and certain unincorporated sections of the County of Los Angeles in the Antelope Valley area.

AVTA’s total service area covers approximately 1,200 square miles and is bounded by the Kern County line to the north, the San Bernardino County line to the east, the Angeles National Forest to the south, and Interstate 5 to the West. AVTA includes a network of 15 local transit routes, three commuter routes, and the North County TRANSporter (NCT) service, which operates as a bridge service between the Santa Clarita and Antelope Valleys on weekdays. AVTA provides three supplemental route services to alleviate crowding on local routes during peak hours. The supplemental service operates two times a day. Local service is operated on weekdays from 5:00 a.m. to 12:36 a.m. Weekend service is operated from 6:00 a.m. to 11:45 p.m. Commuter routes and the NCT service operate Monday through Friday from 3:50 a.m. to 7:54 p.m.

AVTA also provides a complementary paratransit service, known as Dial-a-Ride, operated by Antelope Valley Transportation Services (AVTS). Service within the Urban Zone and Rural Zone 1 is available to elderly persons and persons with disabilities. Service within Rural Zone 2 is open to the general public, operating on weekdays from 6:00 a.m. to 7:30 p.m. and weekends from 8:00 a.m. to 6:00 p.m. Reservations may be placed between 8:00 a.m. and 5:00 p.m. any day of the week.

AVTA fixed-route, Dial-a-Ride and maintenance functions are provided under contract with Transdev Transportation and Antelope Valley Transportation Service (AVTS).



1.3 AVTA MISSION STATEMENT

AVTA Empowers Mobility – Getting people where they need to be safely, timely and cost-effectively.

Our 100% battery electric zero-emission buses run on clean, safe, sustainable energy that has many benefits, including improving air quality, reducing pollution, and positive contributions to the overall health of the Antelope Valley. The people who live and work here know that we care enough about them and the environment we live in to make this commitment.

Our service empowers our customers by giving them greater mobility, greater access to where they want and need to go, and discovery of new experiences. Discovering a better job, a new educational opportunity, a sporting event or even a better place to live, our customers have the power through AVTA to transform their rides into a better quality of life.

Chapter 2: General Requirements

2.1 TITLE VI NOTICE TO THE PUBLIC

The FTA requires that AVTA provide information to the public regarding the recipient's obligations under the Title VI regulations and explain to members of the public of their rights under Title VI.

The following information is made available to the public in both English and Spanish via AVTA's website and printed brochures, which are placed at our customer service center, located in the main lobby of AVTA's administrative offices. In addition, brochures are on all fixed-route buses and restocked on a daily basis. Our complete Title VI Program is also available upon request.

Title VI Public Notice

What is Title VI?

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving Federal financial assistance.

The Antelope Valley Transit Authority (AVTA) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI of the Civil Rights Act of 1964. If you believe you have been subjected to discrimination under Title VI, you may file a complaint.

Who can file a complaint?

Any person who believes that they have, individually, or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color, or national origin may file a Title VI complaint with AVTA.

AVTA Title VI Policy

As a recipient of federal funds, the Antelope Valley Transit Authority (AVTA) has certified and provided assurances that it will fully comply with Title VI of the Civil Rights Act of 1964. AVTA 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.

No person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of transportation service that AVTA furnishes on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color or national origin.

How do I file a Title VI Complaint?

If you believe you have been discriminated against, you may file a signed, written complaint within 180 days of the date of alleged discrimination. The complaint should include the following information:

- a. Your name, address, and how to contact you (i.e., telephone number, email address, etc.)
- b. The location, names, and contact information of any witnesses. The complaint may be filed in writing with AVTA:

Antelope Valley Transit Authority 42210 6th Street West Lancaster, CA 93534
Attention: Title VI Officer

Complaint Assistance

AVTA will assist with writing a complaint if the complainant is unable to do so.

- Email: titlevi@avta.com
- Phone: 661.945-9445 Ext. 254
- Hearing Impaired: 1.888.880.3273 (TDD)

Complainants may also file a Title VI complaint with an external entity such as the FTA, other federal or state agency, or a federal or state court. However, should a complaint be filed with AVTA and an external entity simultaneously, the external complaint will supersede the AVTA complaint and AVTA's complaint procedures will be suspended pending the external entity's findings.

In addition to the complaint process at AVTA, a complainant may file a Title VI complaint with the:

U.S. Department of Transportation Federal Transit Administration Office of Civil Rights
Region IX
201 Mission Street, Suite 1650
San Francisco, California 94105-1839.

What happens to my complaint to AVTA?

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by AVTA will be recorded and immediately assigned a complaint number by AVTA Customer Service.

AVTA Customer Service will provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Complaints will be elevated to the appropriate management team responsible for Title VI compliance.

In instances where additional information is needed for assessment or investigation of the complaint, AVTA will contact the complainant in writing within 15 working days. Failure of the complainant to provide the requested information by a certain date may result in the administrative closure of the complaint.

AVTA will investigate the complaint and prepare a draft written response subject to review by AVTA. If appropriate, AVTA may administratively close the complaint.

AVTA will investigate a formal Title VI complaint within ten (10) working days of receiving the complaint. Based upon all of the information received, AVTA will prepare a draft written response subject to review by AVTA's CEO/Executive Director.

The CEO/Executive Director will determine if the complaint may be administratively closed after the draft is written, or if a final written response is needed. If a final written response is needed, AVTA will send the response to the complainant and advise the complainant of his/her right to file a complaint externally. The complainant has the right to appeal directly to the Executive Director of AVTA within 30 days after the date stated in the resolution letter.

The complainant also will be advised of his/her right to appeal the response to federal and state authorities as appropriate. AVTA will use its best efforts to respond to a Title VI complaint within sixty (60) working days of its receipt of such a complaint, unless a complaint is filed with AVTA and an external entity simultaneously as noted previously.

How will I be notified of the outcome?

AVTA will send a final written response to the complainant and advise the complainant of his or her right to file a complaint externally. AVTA will use its best efforts to respond to Title VI complaints within 60 working days of its receipt of such complaints.

2.2 AVTA TITLE VI COMPLAINT FORM AND PROCEDURES

AVTA maintains an internally controlled comment tracking system (TransTrack) where customers are able to submit comments, suggestions or complaints through various channels, including in person at the AVTA's central facility, facsimile, and telephone or email communication.

Information on how to submit a comment, suggestion or complaint is also available in Spanish. Customers with Limited English Proficiency (LEP) can submit comments utilizing the same methods. Once a customer submits a complaint, the comment is categorized and sent to the appropriate departments and/or AVTA's Operations and Maintenance contractor.

Any complaints of discrimination on the basis of race, color, or national origin are placed in TransTrack under a specific Title VI category. These complaints are recorded and maintained in TransTrack, including the date the complaint was filed; a summary of the allegation; the status of the investigation; and any actions taken in response to the complaint as highlighted in AVTA's Notice of Customer Rights Under Title VI (Appendix A).

The AVTA Title VI Complaint Form (Appendix B) is available by e-mail, in print on request, and via PDF download on the AVTA website.

2.3 TITLE VI INVESTIGATIONS, COMPLAINTS AND LAWSUITS

All transit recipients shall prepare and maintain a list on any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by the FTA;
- Lawsuits; and
- Complaints naming the Antelope Valley Transit Authority.

This list shall include the date that the transit-related Title VI 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 recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in AVTA Title VI Program submitted to the FTA every three years.

AVTA had zero lawsuits and two complaints alleging Title VI violations since the submittal of its 2018 Title VI Program update. The following table summarizes the two complaints received:

Created On	Complaint Description	Status	Summary of Review and Action Taken
Aug 18, 2017	Complainant stated that he and his son boarded the bus with a five-dollar bill. The operator informed him that he must pay the fare with the five-dollar bill, as he was unable to make change. The complainant obtained correct change from another passenger and paid the fare, then proceeded to take his seat. He claimed that as he walked away the operator made a remark that he felt was unprofessional and racially motivated.	Unsubstantiated	AVTA and Transdev staff reviewed video recording of the incident. The complainant initiated further conversation with the operator after the fare was paid, to which the operator responded that he thought the rider was hoping he wouldn't have to pay. The operator's remarks, while inappropriate, were not found to violate any Title VI regulations.
Oct 6, 2017	Complainant stated that she boarded the bus with her children and inserted \$3.00 into the fare box. She explained to the operator that she didn't have enough for the entire fare, but was told that she and her children couldn't ride unless they paid full fare. She stated that an African-American female waiting to board behind her told the operator that she didn't have any money, and the operator waived the fare for that passenger.	Unsubstantiated	AVTA and Transdev staff reviewed video recording of the incident. The operator did state \$4.50 for the fare for the complainant, but allowed another passenger behind her to ride for free. The complaint was found to be valid, but no Title VI regulations were found to have been violated.

2.4 PUBLIC PARTICIPATION

The Federal Transit Administration (FTA) requires a locally developed process to consider public comment before raising fares or carrying out a major reduction in transportation service (Chapter 53, Section 5307). The public, as the primary customer and beneficiary of transit service, is given the opportunity for input and review through the public outreach process.

Actions such as the establishment of new service, fare adjustments, major modifications to existing service (25% or more), and elimination of any bus route include a formal process of review by AVTA, including meaningful public engagement conducted by AVTA staff. AVTA uses a broad range of outreach tools as documented in the AVTA Fare and Service Change Guidelines (Appendix C).

AVTA performs meaningful public engagement on a monthly basis, which includes public meetings in association with the following community and business organizations, among others;

- Lancaster Chamber of Commerce
- Palmdale Chamber of Commerce
- Antelope Valley Hispanic Chamber of Commerce
- Antelope Valley African-American Chamber of Commerce
- Greater Antelope Valley Economic Alliance
- Antelope Valley Board of Trade, and Transportation Committee
- Lancaster and Palmdale First 5 LA/Best Start Community meetings
- Health Neighborhood meetings facilitated by the County of Los Angeles Department of Mental Health
- Service Area Advisory Committee, organized by the County of Los Angeles Department of Mental Health.

AVTA is also in communication with many organizations throughout the region and often attends meetings and events sponsored by these groups. These groups include senior organizations, city and county partners, social service associations, and other organizations within AVTA's service area. Meetings and presentations include, but are not limited to:

07/25/18 – Latino Business Summit

07/31/18 – City of Palmdale National Night Out

08/2/18 – City of Lancaster National Night Out

10/25/18 – Community Connections Resource Fair

11/27/18 – Edwards Air Force Base Town Hall Meeting

01/10/19 – Edwards Air Force Base Community Partner Meeting

05/31/19 – Age Well, Drive Smart, sponsored by Senator Scott Wilk and CHP

08/10/19 – Grace Resources Veterans' Stand Down

08/24/19 – Veterans' Forum and Resource Fair

10/17/19 – High Desert Medical Group Senior Expo

10/17/19 – Latino Business Summit

11/04/19 – Disadvantaged Business Enterprise/Small Business Development Center Outreach

02/05/20 – Disadvantaged Business Enterprise/Small Business Development Center Outreach

02/15/20 – Grace Resources Veterans' Stand-Down

AVTA works with a select representative group of citizens (including those from disadvantaged neighborhoods or representing specific populations) and stakeholders that serve as a Community Advisory Group (CAG) to the agency. The CAG is engaged in input and feedback activities throughout the planning and implementation processes and will provide ongoing insights and critical evaluation of performance in carrying out planning activities and implementation of strategies. This group encourages minorities to participate through business networking, social media and community partnerships. The table below shows the diversity breakdown of the CAG members.

Racial Breakdown of Community Advisory Group	
Non-Minority	69%
African-American (Black)	15%
Hispanic	8%
Other	8%

AVTA has also partnered with the First 5 LA/Best Start Palmdale Transportation Committee. Best Start is First 5 LA’s primary investment for engaging communities in a common vision and intention for children and families to thrive, working to strengthen community leadership and collaboration across sectors. The committee, comprised of community leaders, parents, residents and others, provides vital feedback and information that helps identify and address transportation needs and challenges, helping AVTA remove barriers and expand its services across a broader range. This group encourages minorities to participate through business networking, social media and community partnerships. The table below shows the diversity breakdown of the First 5 LA/Best Start Palmdale Transportation Committee.

Racial Breakdown of Transportation Committee	
Non-Minority	11%
African-American (Black)	39%
Hispanic	38%
Other	12%

At each of the outlined meetings and committees, AVTA provides information on initiatives, travel training, and most importantly receives feedback on requested changes to local, commuter and paratransit services, as well as recommendations for new service, complaints from members of specific groups, etc.

In early 2019, AVTA procured the services of a consulting group to develop and prepare a public outreach plan. The purpose of the regional transit plan was to determine trends, gaps in, barriers to, and satisfaction with public transit that includes relationships to health, housing, economic, and environmental conditions. The participants included stakeholders, community members, community groups, special needs populations, disadvantaged neighborhoods, and across socio-economic groups; and used various methods that maximize public engagement participation.

The plan addressed key objectives across the AVTA service area with particular focus on disadvantaged areas (see attached graphic titled AVTA Disadvantaged Areas) to maximize service access, improve economic parity of resources, reduce health issues, further reduce pollutants and greenhouse gases, improve housing/transit balance, and integrate transportation into land-use policy. The community engagement activities were conducted with multi-language access, using locations and times that maximized the participation of persons living in disadvantaged areas and initiated strategies to maximize participation by those most affected by poverty, air pollution, and lack of access to transportation.

Phase 1 of the AVTA Regional Transit Plan, Mobility Forward, which included recommendations for changes to the local and commuter routes, was approved by the Board of Directors in February 2020. The Board discussed service areas designated as disadvantaged communities, the proposed on-request microtransit service, access to bus stops in existing neighborhoods surrounded by block walls, including bus stops and amenities in proposed residential and commercial developments, service to underserved areas (i.e. Ana Verde, Antelope Acres, etc.), coordinating AVTA's service with adjoining transit agencies, funding sources, and outreach efforts.

During any AVTA public meeting, if any special accommodation is desired or required, the attendee can call AVTA Customer Service 72 working hours prior to the meeting to arrange the proper accommodations. Upon request, AVTA will provide Spanish translation and can offer interpreters for other languages, including American Sign Language (ASL). All AVTA meetings and hearings provide reasonable accommodations in accordance with the Americans with Disabilities Act of 1990 and facilities are wheelchair accessible.

2.5 LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Per the Title VI of the Civil Rights Act of 1964, the U.S. Department of Transportation (DOT) implementing regulations, and Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency (65 FR 50121, Aug. 11, 2000)," AVTA is federally mandated to develop and implement a Language Assistance Plan by which Limited English Proficiency (LEP) persons can meaningfully access translations of written and oral information.

As such, AVTA must take reasonable steps to ensure meaningful access to the benefits, services, information and other important portions of their programs and activities for LEP persons.

The LEP Plan documents the Four-Factor analysis completed to identify appropriate language assistance measures needed to improve access to AVTA services and benefits for LEP persons. Under the analysis, it was determined that approximately 14.3% of the population within AVTA's service area has limited proficiency in the English language. The most predominate language spoken other than English is Spanish at 90.6% of all LEP individuals within our service area. The LEP analysis documents current measures used by AVTA to assist LEP populations including:

- Network with local human service organizations that provide services to LEP individuals and seek opportunities to provide information on programs and services.
- Provide a bilingual staff member at all community events and public hearings.
- Continue to survey bus drivers, dispatchers and customer service staff regarding their contacts with LEP persons during the previous year;
- Continue to post the AVTA Title VI notice and LEP Plan on the agency website, www.avta.com;
- Continue travel training for LEP persons with the assistance of bilingual staff;
- Include questions about whether an interviewee is bilingual on written questionnaires for bus driver and customer service staff during recruitment; and
- When an interpreter is needed for a language other than Spanish, in person or on the telephone, staff will attempt to access language assistance services from a professional translation service.

AVTA's Limited English Proficiency (LEP) Plan was updated for this Title VI Program and is attached in Appendix D.

2.6 MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES

The FTA states that a recipient may not, on the grounds of race, color, or national origin, deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of our service development and planning program.

AVTA is governed by a six-member Board of Directors with governance responsibilities over all activities related to the AVTA. AVTA does not appoint or elect the members of the Board of Directors. Each member of the Board is appointed by the member jurisdictions, as defined in the Joint Exercise of Powers Agreement (JPA), Section 2, Paragraph B, item 1, which states, “The Cities shall each appoint two designated directors from their respective City Council members and one alternate director (who is not required to be a city council member). The Supervisor on the Los Angeles County Board of Supervisors who represents some or all of the Antelope Valley shall appoint to the Board two designated directors and one alternate director...” A CEO/Executive Director manages day-to-day operations and implements Board policy in accordance with the duties specified in the applicable sections of the Government Code of the State of California and the JPA.

AVTA Board of Directors		
Member	Jurisdiction	Minority/Non-Minority
Marvin Crist	City of Lancaster	Non-Minority
Angela Underwood-Jacobs	City of Lancaster	African-American
Ken Mann	City of Lancaster (alternate)	Non-Minority
Raj Malhi	City of Lancaster (alternate)	Minority
Steven D. Hofbauer	City of Palmdale	Non-Minority
Richard Loa	City of Palmdale	Hispanic
Laura Bettencourt	City of Palmdale (alternate)	Non-Minority
Kathy Mac Laren	City of Palmdale (alternate)	Non-Minority
Dianne Knippel	Los Angeles County	Non-Minority
Michelle Flanagan	Los Angeles County	Non-Minority

AVTA’s Transit Advisory Committee (TAC) was established in 1992 to provide input to the Board of Directors. TAC membership is composed of two representatives from each member jurisdiction appointed by the board member. The TAC meets in accordance with a schedule adopted by the Board, typically the second Tuesday of each month, two weeks prior to the AVTA Board meeting.

Transit Advisory Committee		
Member	Jurisdiction	Minority / Non-Minority
Trolis Niebla	City of Lancaster (alternate)	Minority
Candice VanderHyde	City of Lancaster	Non-Minority
Saynne Redifer	City of Palmdale	Minority
Ruben Hovanesian	City of Palmdale	Minority
Jordan Cantanese	Los Angeles County	Minority

Each year, AVTA meets with a Social Services Transit Advisory Committee (SSTAC) to solicit input and evaluate whether any unmet transit needs exist in the AVTA service area that may be reasonable to meet using Transportation Development ACT (TDA) Article 8 funds, a portion of the California Local Transportation Fund generated by ¼ of one cent of the state sales tax. This year's meeting of the SSTAC was held on April 23, 2020. AVTA and Metro encourage minorities to participate through business networking, social media and community partnerships. The list of the members and respective organization/groups are listed below.

Member	Organization/Group
Laura Rice	Legacy Commons Senior Center
Cynthia Cole-Robles	AV Senior Center
Adrian Aguilar	City of Santa Clarita
Eric Haack	Access Services
Zach Krauter	AVTA
Macy Neshati	AVTA
Kelly Miller	AVTA
Fran Seraseras	Community Member
Juan Blanco	Coffee 4 Vets
Jeremy Johnson	Grace Resources
John Huang	Los Angeles County
Audra McDonald	Avalon
Damisha Jones	Child 360/Best Start Palmdale

Racial Breakdown	Social Services Transit Advisory Committee
Non-Minority	62%
African-American (Black)	15%
Hispanic	15%
Other	8%

The TDA Article 8 hearing board consists of four representatives, one each from Palmdale, Lancaster, Los Angeles County, and Santa Clarita.

TDA Article 8 Hearing Board		
Member	Jurisdiction	Minority/ Non-Minority
David Perry	Los Angeles County	Non-Minority
Marvin Crist	City of Lancaster	Non-Minority
Steve Hofbauer	City of Palmdale	Non-Minority
Adrian Aguilar	City of Santa Clarita	Minority

This year the process was concluded at a Hearing Board meeting held on April 28, 2020. The Hearing Board found that there were no unmet transit needs that were reasonable to meet using TDA Article 8 funds, and recommended that AVTA continue to monitor and evaluate all available funding sources.

2.7 MONITORING OF SUBRECIPIENTS AND CONTRACTORS

The Antelope Valley Transit Authority (AVTA) does not have any sub recipients. However, AVTA does contract out its transit operations and maintenance to Transdev Transportation and the Dial-a-Ride service to Antelope Valley Transportation Service (AVTS). As part of its efforts to ensure Transdev and AVTS comply with the requirements of Title VI, AVTA holds periodic meetings with representatives to discuss any potential Title VI issues that may arise or new updates in program.

AVTA requires all operations and maintenance contractors to be fully compliant with FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients.

2.8 FIXED FACILITY IMPACT ANALYSIS

The Title VI requires a Fixed Facility (transit centers, operations facility or yard) Impact Analysis for construction projects to assess any impacts to minority communities. If this information has been prepared as a result of an environmental impact statement, the application recipient or sub recipient should reference the relevant information by documenting page numbers and submission to the FTA.

A Title VI Equity Analysis should also be conducted during the planning stages to assess where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. The recipient shall engage in outreach to persons potentially impacted by the placement of facilities. The Title VI equity analysis must compare the equity impacts of various site alternatives, and the analysis must occur before the selection of the preferred site. Additionally, environmental justice principles as reflected in the DOT Order on Environmental Justice (DOT Order 5610.2(a)), address Environmental Justice in Minority Populations and Low Income Populations. The order describes the process the Department and its modal administrations (including FTA) use to incorporate environmental justice principles into programs, policies, and activities.

As a result of FTA requirements, environmental impact analysis for fixed facilities shall include:

- A Title VI Equity Analysis conducted during planning stages to assess if or how the location will impact minority communities and provides alternatives analysis.
- A project history and background for each project or service plan within the document.
- A discussion of the potential impacts on minority communities and minority-owned businesses during and after construction.
- A discussion on all potential negative environmental impacts, such as traffic congestion, noise, air or water pollution.
- A list of minority owned businesses and household affected by construction projects.
- A description of other significant impacts on minority communities, such as: increased traffic, reduction in parking availability, etc.
- A description of the relocation program and/or other measures adopted by the applicant used to mitigate identified adverse social, economic or environmental effects of the proposed construction project or service plan all of which should include an environmental justice component.

During this Title VI triennial period, Antelope Valley Transit Authority did not undertake any new planning projects that required the Authority to complete a Fixed Facility Impact Analysis.

Chapter 3: Service Standards and Policies

3.1 MAJOR SERVICE CHANGE AND FARE POLICY

All transit providers that operate 50 or more fixed-route vehicles in peak service and are located in urbanized areas (UZA) of 200,000 or more people must conduct a Title VI equity analysis whenever they plan a fare change and/or major service change.

Federal guidelines and AVTA policy require that a public hearing be held when major service changes to the bus system are considered. Major service changes, as defined by AVTA, include the following:

- A change of 25% or more of service on any route.
- A change of 25% or more in the revenue vehicle miles made to any route.
- A new transit route is proposed.
- A poorly performing transit route is eliminated.

At the time of this Title VI Program Update, AVTA has a farebox recovery ratio target of 26.11%. AVTA reviews and reports the farebox recovery ratio compared to the target on a quarterly basis. Based on the analysis, AVTA may recommend fare adjustments as part of a range of solutions to maintain a sustainable long-term financial plan for the agency. All proposed fare changes require a Title VI Equity Analysis under the procedures established by this Title VI program.

AVTA's Service Change Guidelines and Policy is attached as Appendix C.

3.2 DISPARATE IMPACT AND DISPROPORTIONATE BURDEN POLICY

For any proposed change that requires an equity analysis as defined in Section 3.1, AVTA will determine if the change would create a disparate or disproportionate impact to minority and/or *low-income populations, respectively.

The determination of whether a proposed major service change has either disparate impact or disproportionate burden is based on whether the percentage of minority and/or low-income passengers on an affected transit route is greater than the transit system's percentage of minority and/or low-income riders.

Determination of whether a proposed fare adjustment has either a disparate impact or disproportionate burden is based on minority and/or low-income populations bearing a fare rate change of greater than ten (10) percentage points as compared to the non-minority and/or non-low-income populations.

*Low-income as defined by <https://aspe.hhs.gov/poverty-guidelines>

3.3 SERVICE EQUITY ANALYSIS

Transit providers that operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more in population are required to submit a service and/or fare equity analysis. This requirement is to comply with the Title VI regulations, which prohibit disparate impact discrimination, and therefore should document their policies and practices to ensure their service and fare changes do not result in disparate impacts on the basis of race, color or national origin.

Since the previous Title VI update, AVTA has made numerous realignments of routes through two service changes. Each of the service changes focused on minor adjustments to routes that did not require a Service Equity Analysis.

Nelson Nygaard conducted a Fare Equity Analysis in May 2015. Although the Fare Equity Analysis found that none of the 2015 fare changes would exceed the 10 percent disparate impact threshold, the report did recommend AVTA consider additional subsidies to LA Metro's Rider Relief Program (now known as LIFE, Low Income Fare is Easy). The LIFE program provides discounts on bus passes, up to 48% off a full regular fare product, to eligible applicants, based on income.

In 2020, AVTA will be working closely with Metro's contracted agencies, the FAME Corporation and IILA, to help facilitate participation of local residents in the LIFE Program on a broader scale by creating awareness through outreach events, social media and the AVTA website. AVTA will also assist in creating LIFE Enrollment Partners in the Antelope Valley, where applicants can register to participate in the program.

3.4 SERVICE STANDARDS

FTA requires that all fixed route transit providers develop quantitative standards for all fixed- route modes of operation for the indicators listed below. Providers of public transportation may set additional standards as appropriate or applicable to the type of service they provide.

VEHICLE LOAD

Vehicle load can be expressed as the ratio of passengers to the total number of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees (total number of people [52]/amount of seated people [40]). According to the FTA, the average of all loads during the peak operating period should not exceed a vehicle's achievable capacities.

AVTA has adopted the following policies with respect to vehicle loads:

- Peak Period Local Bus – 125% of seated capacity, with no rider required to stand for more than 20 minutes
- Off-Peak Local Bus – 100% of seated capacity
- Commuter Bus – 75% of seated capacity

If the recommended ratio is exceeded, it is the intention of AVTA to relieve any overcrowding by adding supplemental runs, or through routing changes. The table below identifies vehicle load factors by vehicle and service type.

Vehicle Load Factor			
Service Type	Year and Model	Seats	Max Load Factor
Local Transit	40' BYD Low Floor Electric	32	1.5
Local Transit	60' BYD Low Floor Electric	43	1.5
Commuter	45' MCI Highway Coach	53	1.0
Microtransit	Green Power EV Van	12	1.0

In FY15, AVTA implemented an Intelligent Transportation System (ITS) which included Automatic Passenger Counters (APCs) and Automatic Vehicle Locators (AVLs). This allows the Authority to collect essential data at the trip level. It allows stop-by-stop analysis which provides a precise understanding of customer boardings, loads, and travel patterns.

VEHICLE HEADWAY

AVTA operates 15 local fixed routes in the Antelope Valley. While service frequency and span (hours of operation) vary by route, local service generally operates every 15-120 minutes from 5:00 a.m. to 12:36 a.m. AVTA provides three supplemental route services to alleviate crowding on local routes during peak hours. The supplemental service operates two times a day. In addition, AVTA extended the area of service and it is now providing service to Edwards Air Force Base (Route 747) and to Mojave Air and Space Port (Route 748).

Commuter routes serve both Sgt. Steve Owen Memorial Park and the Palmdale Transportation Center. The number and frequency of trips offered varies by route. Commuter bus service begins earlier than 4:00 a.m. due to the Antelope Valley’s distance from the following destinations in Los Angeles County:

- Downtown Los Angeles,
- Century City/West Los Angeles/UCLA, and
- West San Fernando Valley/CSU-Northridge.

AVTA also operates the North County TRANSporter (790), a midday route that connects the Palmdale Transportation Center with the Newhall Metrolink Station and the McBean Regional Transit Center in Santa Clarita. This route bridges most of the midday service gap during which the Metrolink Antelope Valley Line does not operate north of Santa Clarita. It is also the only bus connection between the Antelope Valley and the Santa Clarita Valley.

Below is a table highlighting AVTA’s frequencies and span of service:

Service Span							
Route	Service Type	Span	Frequency (minutes)				
			AM 5AM-8AM	Midday 8AM-3PM	PM 3PM- 6PM	Evening 6PM- 9PM	Night 9PM-12AM
1	Local	5:00a – 12:36a	30	15	30	30-60	60
2	Local	5:55a – 10:43p	30	30	30	60	60
3	Local	5:55a – 10:44p	30	30	30	60	60
4	Local	5:35a – 9:20p	60	60	60	60	60
5	Local	6:00a – 10:03p	70	70	70	70	60
7	Local	5:00a – 10:52p	75	75	75	75	60
8	Local	6:35a – 6:45p	90	90	90	90	
9	Local	6:15a – 8:05p	90	90	90	90	90
11	Local	5:15a – 11:55p	30	30	30	60	60
12	Local	5:05a – 11:38p	30	30	30	60	60
50	Rural	5:20a – 11:12p	120	120	120	120	120
51	Rural	5:30a – 10:33p	120	120	120	120	120
52	Local/Rural	5:30a – 11:24p	120	120	120	120	120
94	Supplemental	6:40a – 3:55p	1 trip	N/A	1 trip	N/A	N/A
97	Supplemental	6:35a – 3:45p	1 trip	N/A	1 trip	N/A	N/A
98	Supplemental	6:30a – 3:22p	1 trip	N/A	1 trip	N/A	N/A
747	Local	5:15a – 6:45p	4 trips	N/A	4 trips	N/A	N/A
748	Local	4:50a – 6:25p	2 trips	N/A	2 trips	N/A	N/A
785	Commuter	3:50a – 8:55a 2:50p – 7:47p	15-20	N/A	20-25	N/A	N/A
786	Commuter	4:00a – 8:14a 2:50p – 7:28p	20-30	N/A	20-40	N/A	N/A
787	Commuter	4:00a – 8:58a 2:50p – 7:54p	10-20	N/A	20-30	N/A	N/A
790	Commuter	7:50a – 5:50p	2 trips	6 trips	2 trips	N/A	N/A

ON-TIME PERFORMANCE

A vehicle is considered on time if it departs a scheduled time point zero (0) minutes early and no more than 5 minutes late. AVTA’s on-time performance target for fixed-route service is 85% or greater. AVTA monitors on-time performance and system-wide key performance indicators on a monthly basis. Trends are reported to the Board of Directors on a quarterly basis.

SERVICE AVAILABILITY

Like many urban areas, the Antelope Valley has multiple activity centers instead of a single central business district (CBD). Within the AVTA service area, there are vast areas of extremely low-density housing and employment sites. The AVTA attempts to link major trip generating sites and route vehicles along major commercial thoroughfares. This approach allows for better access to schools, shopping centers, government centers, parks, libraries, hospitals, and community and senior centers. AVTA intends to continue to route vehicles so that this type of access is preserved to these facilities.

Also, all local bus stops will be spaced no more than 0.25 miles apart in the denser areas and no more than .50 miles apart in the rural, less dense locations of the AVTA service area.

3.5 SERVICE POLICIES

The Federal Transportation Administration (FTA) requires that all providers of fixed-route public transportation develop qualitative policies for the following procedures: Vehicle Assignment and Transit Amenities. AVTA has adopted qualitative policies as summarized below. These policies were developed to help AVTA better achieve equity for all of its transit riders.

VEHICLE ASSIGNMENTS

Vehicle assignment refers to the allocation of transit vehicles to ensure that all communities receive the same quality of rolling stock benefits. Benefits include the vehicle age and standard on-board amenities such as air conditioning and upholstery.

AVTA’s average fleet age as of the adoption of this Title VI Program is 6.4 years old. In order to ensure equitable distribution of vehicles based on vehicle age, each route is randomly assigned buses without regard to the vehicle age, as maintenance and repair needs permit. Given the length of some routes, vehicle assignment of electric vehicles may also be dependent upon the availability of electric charging facilities along the route.

Listed below is the entire transit fleet breakdown and scheduled replacement year:

Service Type	Number in Class	Year and Model	Scheduled Replacement
Local Transit	6	2014 40' BYD K9M Electric	FY 2026
Local Transit	21	2018 40' BYD K9M Electric	FY 2030
Local Transit	13	2019 40' BYD K9M Electric	FY 2031
Local Transit	13	2017 60' BYD K11M Electric	FY 2029
<i>Total Local Transit</i>	53		
Commuter	13	2004 45' MCI Highway Coach	FY 2017
Commuter	6	2008 45' MCI Highway Coach	FY 2020
Commuter	6	2012 45' MCI Highway Coach	FY 2024
Commuter	5	2015 45' MCI Highway Coach	FY 2027
<i>Total Commuter</i>	30		
Microtransit	8	2019 Green Power EV Van	FY2024
<i>Total Microtransit</i>	8		
<i>Total Active Fleet</i>	91		

TRANSIT AMENITIES

AVTA's emphasis on customer service includes the improvements of its "front door" – the bus stops. The Bus Stop Improvement Program (BSIP), also known as the Regional Partnership Program (RPP), began in FY11. The goal was to increase the attractiveness of bus stops by creating a full-time bus stop maintenance program. The bus stops maintenance program employs five technicians who provide general maintenance and minor repairs for bus stop amenities. Technicians track bus stop maintenance, graffiti history, and customer requests. All 874 active bus stops have been geo-coded and tracked through a bus stop database.

AVTA inventories existing amenities within the service area and determines where new or possible replacement facilities should be located based on bus stop boardings, waiting times, other nearby shelters and amenities, minority/non-minority census tract distribution, and ADA accessibility.

AVTA is currently in the process of improving bus stops within its service area by encouraging and assisting the local jurisdictions as they upgrade bus stops with new shelters, route information, and trash receptacles through the RPP. For FY2020, AVTA's approved budget includes \$2,665,000 in Federal Section 5307 funds for this program. Any construction expected to cross into FY2021, as well as new projects, will be covered in the FY2021 budget, with the amount to be determined.

Transit amenities refer to fixed items of comfort and convenience available to the general riding public such as bus stop benches and shelters. AVTA reviews and ensures amenities are placed in locations within each city without regard to race, color, national origin, or income considerations. Occasionally, unofficial amenities that are not owned or maintained by AVTA are placed without direction or control of the Authority.

Chapter 4: Demographics

FTA requires transit providers receiving federal assistance to provide demographic maps that shade census tracts where the percentage of total minority and low-income population reside in the service area. These maps and charts will help the transit provider determine whether and to what extent transit service is available to minority populations within the transit provider's service area. The maps and charts must be updated: 1) at least every three years, 2) after each Federal census data become available; and 3) when there are significant changes in the transit system.

Using American Community Survey (ACS) data, AVTA created map layers and created a visual display to show demographic information in relation to its service area.

4.1 MINORITY CHARACTERISTICS

The 2019 Greater Antelope Valley Economic Alliance Round Table Report estimated 406,916 residents in the census tracts within the defined AVTA service area. The service area's minority population includes Black, Hispanic, Asian, Native American, and Pacific Islander populations as well as those citing two or more races. In the AVTA service area, 69.55% (283,010) of the residents were designated as minority in 2019.

Total Population	Minority	Non-Minority
406,916	283,010	123,906
	69.55%	30.45%

Appendix E shows the demographic map with census tracts where minorities reside within the AVTA service area. This map helps AVTA to determine that transit services are available to minority and non-minority populations equally within the AVTA Service area.

4.2 INCOME CHARACTERISTICS

According to results from the 2014-2018 ACS 5-year narratives, 19.47% of the population within the AVTA service area was living at or below the poverty line.

Total Population	People Below Poverty Line	Low Income Percentage
406,916	79,227	19.47%

Appendix E shows the census tracts in the AVTA service area based on percentage of residents living at or below the poverty line. This map allowed AVTA to determine that transit services are available to low income and non-low income populations equally within the Authority's service area.

4.3 MINORITY & LOW INCOME CHARACTERISTICS

To better understand the minority and low-income population distribution patterns, each census tract in the AVTA service area is classified into one of the following two categories: Above Average Minority, Above Average Low Income.

Appendix E shows the distribution pattern maps of minority and low-income population in the Antelope Valley service area.

4.4 DEMOGRAPHICS

According to the AVTA's 2018 Limited English Proficiency (LEP) Plan, 31.2% of residents within the AVTA service area speak a language other than English. Of those residents, 86.6% are Spanish speakers (See Appendix D).

Every five years, Title VI requires agencies to conduct a ridership survey that collects demographic data. An online survey of AVTA passengers was conducted in June 2019 on all local and express routes. The local route survey featured 10 questions addressing trip purposes, resources used for trip planning, travel to and from stops, transfer activity, and priorities for service improvement. Participants were also asked to provide optional personal demographic information. The online survey was available in both English and Spanish. Current routes are represented in demographic maps provided in Appendices D, E, and F.

Passengers on commuter Routes 785, 786, 787, and 790 were given a slightly different version of the survey. The commuter route survey asked respondents to include the stops they were using in Los Angeles County. A total of 103 surveys were collected.

This current report includes data from the 2017 ACS 5-year estimates from Census Bureau, which is the most recent census data available. The Demographic Tables and Service Profile Maps included in Appendix G illustrate the relationship the demographic makeup of the service area.

4.5 MONITORING TRANSIT SERVICES

AVTA regularly monitors the service in its service area. Performance targets against five key agency goals are monitored. Nine performance indicators are evaluated on a monthly basis to determine if the established performance targets are being met. This evaluation includes passengers per service hour, cost per vehicle service hour, call response time, number of complaints, number of preventable accidents, service on-time performance, and farebox recovery ratio.

The U.S. Census provides demographic information by census tract and block level as identified in Section 4.3, in addition to population estimates, ethnicity, income and other quick facts. This report is used in AVTA's LEP plan and demographic maps and data to determine where minority and low-income residents live within the Authority's service area as illustrated in Appendix D and Appendix G.

4.6 CONCLUSION

This report fulfills the compliance reporting requirements for Title VI as detailed in FTA Circular 4702.1B. This report details AVTA's services, long-range planning efforts and general reporting requirements mentioned in the circular. The program-specific requirements were addressed with a demographic and service profile along with a description of AVTA's service standards and policies. Service changes and service monitoring were also described. The results demonstrate that AVTA serves a diverse population and supplies public transportation equitably to all classified races, ethnicities, and income levels.

Appendix A | Notice of Customer Rights

TITLE VI NOTIFICATION

NOTIFICACIÓN DE TÍTULO VI

The Antelope Valley Transit Authority (AVTA) ensures that 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.

If you feel you have experienced discrimination in the level and/or quality of transportation services and transit-related benefits that you have received, you may file a complaint with AVTA. For more information on AVTA's Title VI policy, you may call 661.945.9445 or visit avta.com. A complainant may file a complaint in writing at the following address: Antelope Valley Transit Authority, 42210 6th Street West, Lancaster, CA 93534, Attention: Customer Service. To download a complaint form, visit avta.com/title_vi_complaint.htm.

A complainant may file a Title VI complaint directly with the Federal Transit Administration by writing to the U.S. Department of Transportation, Federal Transit Administration, Office of Civil Rights, Region IX, 201 Mission Street, Suite 1650, San Francisco, CA 94105-1839.

El Antelope Valley Transit Authority (AVTA) asegura que ninguna persona por raza, color o origen nacional será objeto de discriminación en el nivel y calidad de los servicios de transporte y beneficios relacionados con el tránsito.

Si cree que ha experimentado discriminación en el nivel y / o la calidad de los servicios de transporte y los beneficios relacionados con el tránsito que ha recibido, puede presentar una queja ante AVTA. Para obtener más información sobre la política Título VI de AVTA, puede llamar al 661.945.9445 o visitar avta.com. Un reclamante puede presentar una queja por escrito en la siguiente dirección: Antelope Valley Transit Authority, 42210 6th Street West, Lancaster, CA 93534, Attention: Customer Service (Atención: Servicio al Cliente). Para descargar un formulario de queja, visite avta.com/title_vi_complaint.htm.

Un demandante puede presentar una queja de Título VI directamente con el Administración de Tránsito Federal escribiendo al U.S. Department of Transportation, Federal Transit Administration, Office of Civil Rights, Region IX, 201 Mission Street, Suite 1650, San Francisco, CA 94105-1839.



Appendix B | Title VI Complaint Form



Title VI Complaint Form

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

The following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form, please let us know.

Complete and return this form to Customer Service: Antelope Valley Transit Authority, 42210 6th Street West, Lancaster, CA 93534.

1. Complainant's Name _____
2. Address: _____
3. City: _____ State: _____ Zip Code: _____
4. Telephone Number (home): _____ (business) _____
5. Person discriminated against (if someone other than the complainant):
Name: _____
Address: _____
City: _____ State: _____ Zip Code: _____
6. Which of the following best describes the reason you believe the discrimination took place? Was it because of your:
a. Race
b. Color:
c. National Origin:
7. What date did the alleged discrimination take place?



Antelope Valley Transit Authority 42210 6th Street West | Lancaster, California 93534 | 661.945.9445 | avta.com

8. In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.

9. Have you filed this complaint with any other federal, state, or local agency; with any federal or state court? Yes: [] No: []

If yes, check each box that applies:

Federal agency | Federal court | State agency []
State court | Local agency |

10. Please provide information about a contact person at the agency/court where the complaint was filed.

Name _____
Address: _____
City: _____ State: _____ Zip Code: _____
Telephone Number: _____

11. Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

Complainant's Signature _____ Date _____

Appendix C | AVTA Fare and Service Change Guidelines

Policy Statement

It is the policy of the AVTA Board of Directors to require service routes to be periodically evaluated to ensure bus service is responsive to the community's needs while remaining an efficient delivery system. Schedule changes are conducted to modify service based on patronage and/or budget fluctuations. Service changes follow an established timeline and process coinciding with the coach operators bid schedule in June and December.

All service changes and enhancements at AVTA are developed and evaluated by the planning staff and the operations team based on service improvement concepts recommended by customers and employees, service design studies, and performance monitoring results.

As our community grows, it becomes necessary to adjust our routes to serve new developments and adjust to the changing environment.

The evaluation process includes a formal public review of the proposals, a technical evaluation of ridership and resource impacts based on established service guidelines and standards, environmental considerations, and coordination with key stakeholders in the regional transit system.

Federal guidelines and AVTA policy require that, based on specific measures, a public hearing is held when major service changes to the transit system are considered. Before each proposed service adjustment is approved, the public is notified of the upcoming changes. AVTA conducts public hearings, public outreach, ride-a-longs on impacted lines, and rider surveys for public comments. We also make the proposed service change information easily available onboard AVTA buses and the AVTA website.

The Board has developed a process for receiving public testimony, which is utilized to evaluate proposed changes before any decision is approved by the Board. Once a program is reviewed and approved by the Board of Directors, new public timetables and bus operator work assignments are developed.

AVTA recommends fare policy changes based on the requirement of achieving minimum farebox recovery ratio objectives set for Fixed-Route and Commuter Services. AVTA is required by the Transportation Development Act to maintain a farebox recovery ratio of at least 20% for its general public services.

Service Change Timeline

Key Activities	Required Lead Time*
Planning Process Begins	6
Develop Preliminary Recommendations, Routing and Schedules	5
Impact Analysis on Proposed Changes	3-4
Public Review and Feedback	3-4
Finalize Program	2
Program Approval	2
Develop Operator Assignments	2
Print Public Schedules and Maps	1

**Required Lead Time: Months prior to service implementation.*

Implementing Minor Changes on an Interim Basis

Minor service changes are generally route and/or schedule modifications that can be accommodated without impacting the vehicle or operator requirements of the service. AVTA can make minor route and/or schedule modifications (not requiring a public hearing) not to exceed an annual cost.

Service Change Measures

Federal guidelines and AVTA policy require that a public hearing be held when major service changes to the transit system are considered. Major Service Changes, as defined by AVTA, include the following:

- A change of 25% or more of service on any route.
- A change of 25% or more in the revenue vehicle miles made to any route.
- A new transit route is proposed.
- A transit route is eliminated.

Standard seasonal variations in transit service are exempt from public hearing requirements.

Emergency service changes may be instituted for 180 days or less without prior notification. A public hearing must be held during that time if the emergency service is to remain in effect for more than 180 days.

Impact Analysis for Proposed Changes

Prior to approval, service changes undergo a technical evaluation. The purpose of the evaluation is two-fold: 1) to define and evaluate the impact on riders; and 2) to develop appropriate mitigation measures if needed. Factors considered are: service performance, availability of alternatives and special mitigation strategies. As part of this evaluation process, resource impacts including in-service hours and vehicles are also tracked to ensure compliance with budget parameters.

Title VI Process for Major Service Changes

Title VI of the 1964 Civil Rights Act states that “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.” Title VI bars intentional discrimination as well as disparate impact discrimination (i.e., a neutral policy or practice that has a disparate impact on protected groups).

Chapter V part 4 of the Federal Transit Administration Circular 4702.1A requires transit agencies serving large urbanized areas to evaluate significant system-wide service and fare changes at the planning and programming stages to determine whether proposed changes would have a discriminatory impact. For service changes, this requirement applies to “major service changes” only and the recipient should establish guidelines or thresholds for what it considers a “major service change” to be.

AVTA must ensure that there is Title VI consideration whenever there is a change in service that could impact minority communities. AVTA must describe significant service changes relating to hours or days of operation, headways or fares, and provide an analysis of the effect that any proposed changes may have on minority, Limited English Proficiency (LEP), and low-income communities.

All major service changes will be screened to determine if they have a disparate impact on minority and LEP communities, or place a disproportionate burden on low-income populations (target populations). The routing of those services, for which major changes are recommended, will be analyzed using U.S. Census information to determine if the route serves a large share of the target population(s). If it does, then the impacts of the change will be determined, and if they are significant, mitigation may be recommended, alternative services identified, and the change could be withdrawn. If the route does not serve a large share of the target populations, no further review will be required.

Public Hearing Process

After a service change has been developed by AVTA staff, a public hearing will be scheduled identifying the date, time, and location of the hearing. Information pertaining to the service change program will be summarized and presented in an informational report to the AVTA Board of Directors. The public hearing may be held at the conclusion of an outreach program of at least 30 days.

Public Outreach

Prior to the public hearing, a number of public outreach efforts are made so that the greatest number of patrons may respond to the changes at either a public hearing, or by submitting written comments via email, mail, or fax. The public outreach efforts include:

- Distribution of informational brochures on AVTA buses and at information centers, which include route number, route name and route changes.
- Placement of information cards in holders located behind the bus operator

- Public outreach at key transportation centers, bus stops, and on-board vehicles occurs up to one month before the public hearing is held. This effort reaches patrons who may not have time to attend a public hearing, and informs them of other communication methods available for filing public comments.

Public participation in the public hearing process is an important step in assisting staff in developing and approving final service changes. AVTA ensures that the needs of all minorities and LEP populations are considered by using the following procedures at all public participation activities:

- Bilingual staff representation at all outreach events
- Bilingual surveys at outreach events to assess needs and increase minority and LEP engagement
- Partnerships with local social-service and faith-based groups for greater opportunities to engage with the community.

Appendix D | AVTA Limited English Proficiency (LEP) Plan

Introduction

The Limited English Proficiency (LEP) Plan has been prepared to address the Antelope Valley Transit Authority's (AVTA) responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964 and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin. AVTA will take reasonable steps to ensure that all persons have meaningful access to its programs, service and information, at no additional cost.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies that receive federal funds, including AVTA.

AVTA's goal is to take responsible steps to ensure meaningful access to benefits, services and information for LEP persons in the service area and eliminate language barriers as much as possible. All residents in this service area should be able to understand and utilize the transit services provided.

Plan Summary

AVTA has developed this Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided by AVTA. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required and how to notify LEP persons that assistance is available.

In order to prepare this plan, AVTA undertook the U.S. Department of Transportation's (U.S. DOT) Four-Factor LEP analysis, which considers the following factors:

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 AVTA programs, activities or services.
3. The nature and importance of services provided by AVTA to the LEP population.
4. The resources available to AVTA and overall cost to provide LEP assistance.

A summary of the results of AVTA’s Four-Factor analysis is outlined below.

Four-Factor Analysis

1. The number and proportion of LEP persons served or encountered in the eligible service population.

AVTA’s service area covers the Antelope Valley and a small portion of the Santa Clarita Valley. The Antelope Valley consists of the cities of Palmdale and Lancaster with some various unincorporated areas of Los Angeles County. For planning purposes, AVTA reviewed the 2011- 2015 American Community Survey 5-year estimates “Languages Spoken at Home” (B16001) by Census Tract for the AVTA service area (most current data as of this update).

The AVTA service area has a total population of 353,673 over five years of age. In this population, 68.8% speak only English. Of the 31.2% that speak a language other than English, approximately 50,664 residents, or 14.33%, indicated that they speak English “less than very well”. Of the 50,664 residents that would be considered LEP, (speak English “less than very well”) 45,902 or 91% are Spanish speakers.

Other languages spoken within the AVTA service area include Indo-European (Persian and Armenian), Asian and Pacific Island (Tagalog, Chinese, Cambodian, Korean, and Vietnamese) and all other languages (Arabic). The table below illustrates the number of LEP residents by language.

AVTA Population with Limited English Proficiency		
Language	LEP Speakers	LEP Percent of Total Population
Spanish	45,903	12.98%
Tagalog	1,407	0.40%
Vietnamese	620	0.18%
Korean	617	0.17%
Arabic	552	0.16%
Chinese	525	0.15%
Armenian	357	0.10%
Persian	350	0.10%
Mon-Khmer/Cambodian	333	0.09%
Total	50,664	14.33%

Source: 2015 ACS 5-year estimates

Based on the demographics outlined above, the primary focus of AVTA efforts is on the Spanish speaking segment of the LEP population.

2. The frequency with which LEP persons come in contact with AVTA programs, activities or services.

AVTA serves LEP persons daily via our fixed route and dial-a-ride services. The majority of our LEP persons are Spanish speaking. To date, the most frequent contact between LEP persons and our transit staff is with bus operators. To try to have more Spanish-language assistance available on our buses, we actively recruit for bilingual operators on our website and recruitment flyers. The second highest form of contact is through our customer service representatives, of which 60% speak Spanish fluently and have the ability to translate. The local language resources at AVTA had been sufficient to meet the needs of LEP persons. At this time, we do not track which calls or in-person visits are from LEP individuals. However, our call center phone system allows patrons to request to speak with a Spanish-speaking individual.

- LEP Attachment 1 provides the full 2010-2015 American Community Survey “Languages Spoken at Home” (S16001) by the Census Tract level of the service area.
- LEP Attachment 2 illustrates the service area and route maps with Spanish language densities.

3. The nature and importance of services provided by AVTA to the LEP population.

AVTA provides important transit services to the public through its fixed route and Dial-a-Ride services. AVTA is the only major public transportation provider in the Antelope Valley and provides commuter bus service between the Antelope Valley and the Los Angeles basin (Century City, San Fernando and Downtown Los Angeles). AVTA also provides service to Santa Clarita with the Route 790, dubbed the North County TRANSporter. AVTA provides residents, including LEP persons, transportation services for the purpose of commuting to work, shopping, recreational needs, personal errands, school and other services that are frequently accessed by the public.

4. The resources available to AVTA and overall cost to provide LEP assistance.

Providing translation services to allow LEP populations to participate in the development of AVTA’s core planning and investment policies is a routine practice for the Authority. AVTA’s customer service call center, which processes customer comments by phone, mail, email, and in-person, currently benefits from having staff members who speak, read, and write Spanish. Some of our Antelope Valley Transportation Services (AVTS) reservations specialists (who handle the Dial-A-Ride call center) also speak Spanish.

Documents translated into Spanish include rider alerts posted on our buses and at bus stops; fare and/or service change information; and current fare and pass information. AVTA currently provides a Spanish translator at all community events and has developed Spanish language marketing campaigns promoting the benefits of public transportation via Spanish newspapers, television and radio ads. AVTA’s website also provides a one-button/click solution for translation to Spanish. In addition, AVTA has developed 15 English and Spanish Travel Training videos as part of its mobility management program.

Based on the Four-Factor analysis, AVTA developed its LEP Plan as outlined in the following section.

Limited English Proficiency (LEP) Plan Outline

How AVTA and staff may identify an LEP person who needs language assistance:

1. Examine records to see if requests for language assistance were received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Have a bilingual staff person greet participants as they arrive to an AVTA sponsored events. By informally engaging participants in conversation, it is possible to gauge each attendee's ability to speak and understand English.
3. Consistently monitor the number of people that access the transit website in Spanish. In addition, continue to update the site wherever needed.
4. If a vehicle operator encounters a customer in need of assistance in a language other than English, vehicle operators are instructed to try to obtain their contact information and give this information to their manager for follow-up.
5. Automated phone tree is available in English and in Spanish. Callers are given the opportunity to speak directly to a Spanish-speaking staff person.

Language Assistance Measures

There are numerous language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which AVTA staff responds to LEP persons, whether in person, by telephone or in writing.

- Networking with local human service organizations that provide services to LEP individuals and seek opportunities to provide information on programs and services.
- Providing a bilingual staff member at all community events and public hearings.
- Continuing to survey bus operators, dispatchers and customer service staff, on their experience concerning any contacts with LEP persons during the previous year;
- Continuing to post the AVTA Title VI notice and LEP Plan on the agency website, www.avta.com;
- Continuing Travel Training to LEP persons with the assistance of bilingual staff;
- Including language "Spanish a plus" on bus operator and customer service staff recruitment flyers and onboard recruitment posters;
- When an interpreter is needed, for a language other than Spanish, in person or on the telephone, staff will attempt to access language assistance services from a professional translation service within the given time notice.

Staff Training

The following training is provided to all AVTA staff:

1. Information on the AVTA's Title VI procedures and LEP responsibilities
2. Documentation of language assistance requests
3. How to handle a potential Title VI/LEP complaint

All contractors or subcontractors performing work AVTA will be required to follow the Title VI and LEP guidelines.

Outreach Techniques

When staff prepares a document or schedules a meeting for which the target audience is expected to include LEP individuals, documents, meeting notices, flyers and agendas will also be printed in the alternative language based on the known LEP population (Spanish). Interpreters will also be available as needed. Other techniques include bilingual staff representation at all outreach events, bilingual surveys at outreach events to assess needs and increase minority/LEP engagement, and partnerships with local social-service and faith-based groups for greater opportunities to engage with the community.

Monitoring and Updating the LEP Plan

AVTA will update the LEP plan as required by the U.S. DOT. At minimum, the plan will be reviewed and updated every three years or when it is clear that higher concentrations of LEP individuals are present in the AVTA service area.

Updates will include the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determination as to whether the need for translation services has changed
- Determine whether local language assistance programs have been effective and sufficient to meet the need
- Determine whether AVTA's financial resources are sufficient to fund language assistance resources needed
- Determine whether AVTA has fully complied with the goals of this LEP plan
- Determine whether complaints have been received concerning AVTA's failure to meet the needs of LEP individuals

Dissemination of the Antelope Valley Transit Authority LEP Plan

A link to the AVTA LEP Plan and the Title VI Notice is included on the AVTA website at www.avta.com. Any person or agency with internet access will be able to access and download the plan. Alternatively, any person or agency may request a copy of the plan via telephone, fax, and mail or in person and shall be provided with a copy of the plan at no cost. LEP individuals may request translated copies of the plan, which AVTA will provide.

Questions or comments regarding the LEP Plan may be submitted to:

Title VI Officer

42210 6th Street West Lancaster, CA. 93534 Phone: (661) 729-2203

Fax: (661) 726-2615

Email: titlevi@avta.com

Attachment 1: AVTA Demographics Study
 Limited English Proficiency Table

Language Spoken at Home and Ability to Speak English	
Language	Total
Spanish or Spanish Creole	95421
Speak English "very well"	49518
Speak English less than "very well"	45903
Asian	8673
Speak English "very well"	4788
Speak English less than "very well"	3885
Indo-European Languages	4263
Speak English "very well"	2679
Speak English less than "very well"	1584
All Other Languages	1882
Speak English "very well"	1233
Speak English less than "very well"	649

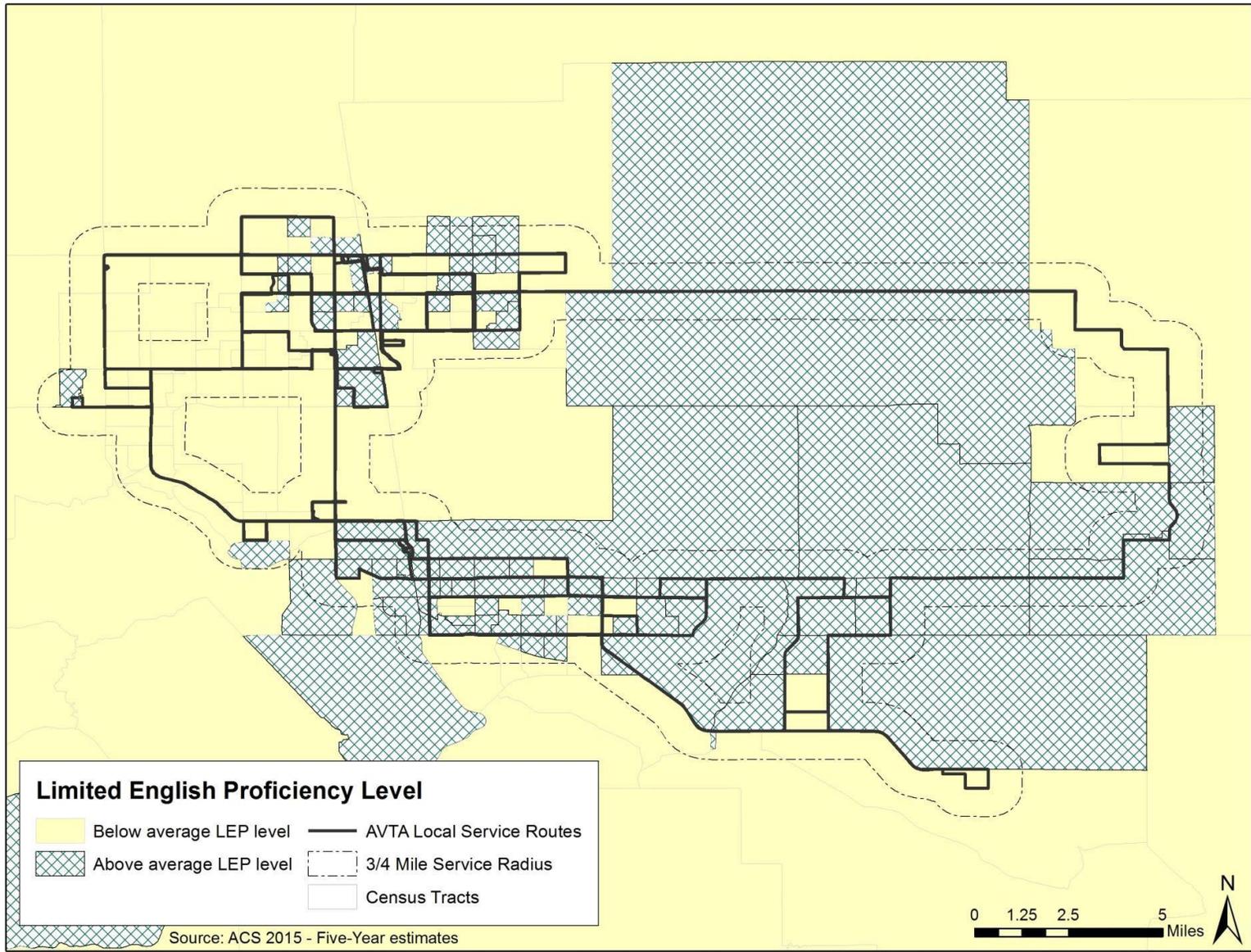
Source: 2015 ACS 5-year estimates

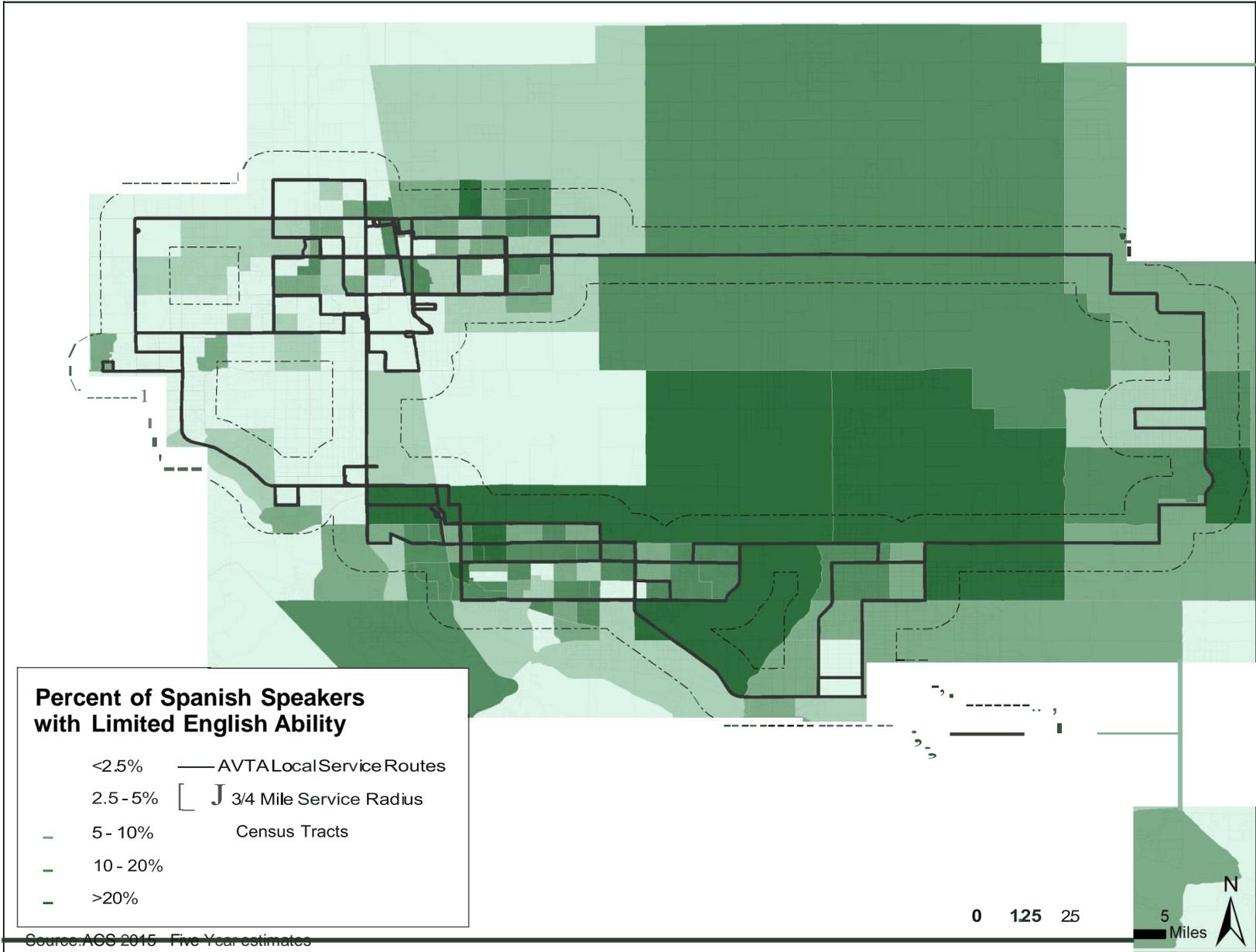
AVTA Population with Limited English Proficiency		
Language	LEP Speakers	LEP Percent of Total Population
Spanish	45,903	12.98%
Tagalog	1,407	0.40%
Vietnamese	620	0.18%
Korean	617	0.17%
Arabic	552	0.16%
Chinese	525	0.15%
Armenian	357	0.10%
Persian	350	0.10%
Mon-Khmer/Cambodian	333	0.09%
Total	50,664	14.33%

Source: 2015 ACS 5-year estimates

Language Spoken at Home		Total	Language Spoken at Home		Total
Spanish or Spanish Creole:		95421	Other Slavic languages:		75
	Speak English "very well"	49518		Speak English "very well"	65
	Speak English less than "very well"	45903		Speak English less than "very well"	10
French:		518	Armenian:		722
	Speak English "very well"	371		Speak English "very well"	365
	Speak English less than "very well"	147		Speak English less than "very well"	357
French Creole:		29	Persian:		544
	Speak English "very well"	22		Speak English "very well"	194
	Speak English less than "very well"	7		Speak English less than "very well"	350
Italian:		172	Gujarati:		0
	Speak English "very well"	138		Speak English "very well"	0
	Speak English less than "very well"	34		Speak English less than "very well"	0
Portuguese or Portuguese Creole:		92	Hindi:		75
	Speak English "very well"	76		Speak English "very well"	45
	Speak English less than "very well"	16		Speak English less than "very well"	30
German:		482	Urdu:		48
	Speak English "very well"	389		Speak English "very well"	38
	Speak English less than "very well"	93		Speak English less than "very well"	10
Yiddish:		4	Other Indic languages:		471
	Speak English "very well"	4		Speak English "very well"	199
	Speak English less than "very well"	0		Speak English less than "very well"	272
Other West Germanic languages:		139	Other Indo-European languages:		372
	Speak English "very well"	102		Speak English "very well"	325
	Speak English less than "very well"	37		Speak English less than "very well"	47
Scandinavian languages:		84	Chinese:		928
	Speak English "very well"	72		Speak English "very well"	403
	Speak English less than "very well"	12		Speak English less than "very well"	525
Greek:		93	Japanese:		305
	Speak English "very well"	46		Speak English "very well"	176
	Speak English less than "very well"	47		Speak English less than "very well"	129
Russian:		223	Korean:		956
	Speak English "very well"	152		Speak English "very well"	339
	Speak English less than "very well"	71		Speak English less than "very well"	617
Polish:		89	Mon-Khmer, Cambodian:		556
	Speak English "very well"	58		Speak English "very well"	223
	Speak English less than "very well"	31		Speak English less than "very well"	333
Serbo-Croatian:		31	Hmong:		0
	Speak English "very well"	18		Speak English "very well"	0
	Speak English less than "very well"	13		Speak English less than "very well"	0

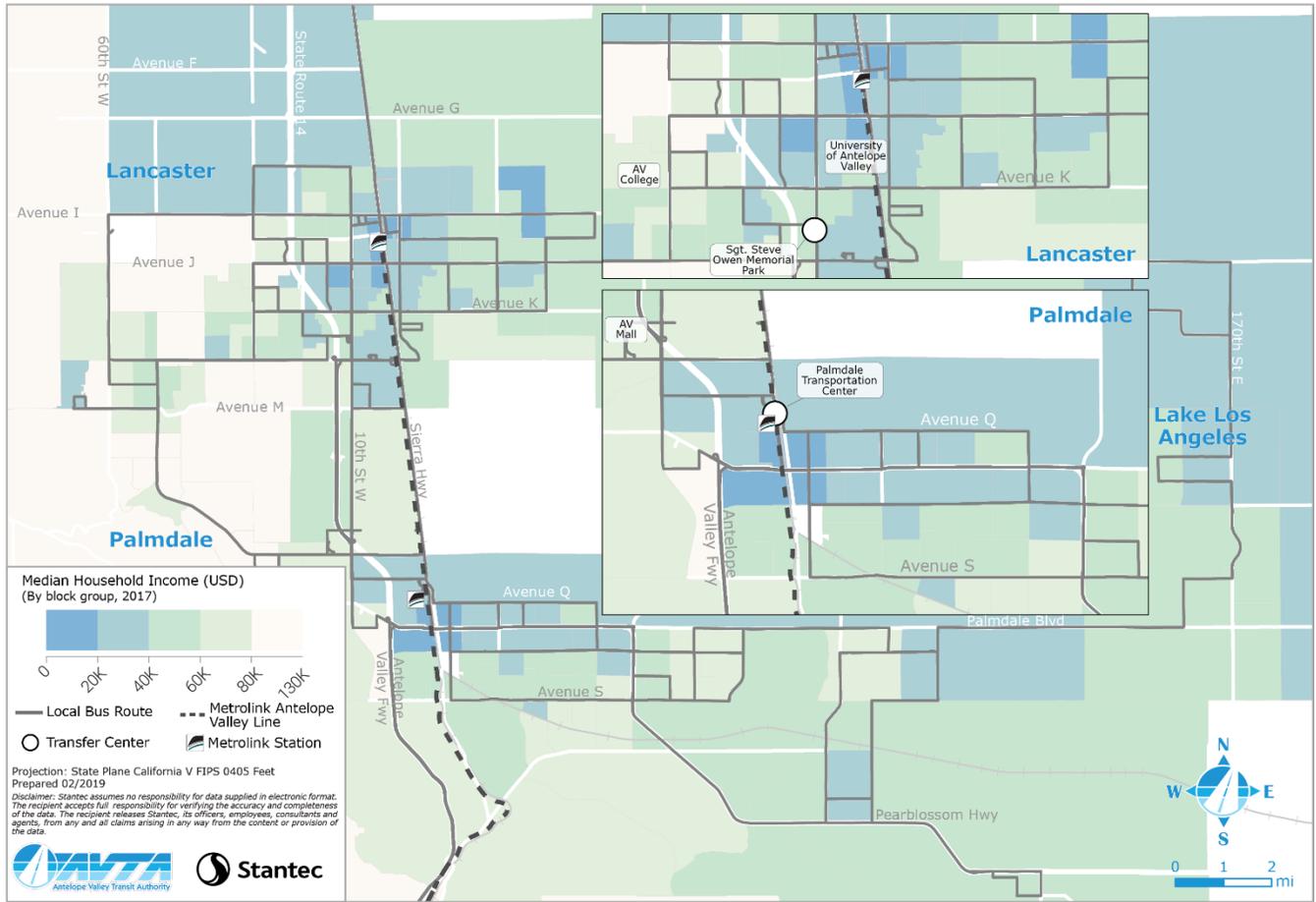
Language Spoken at Home		Total	Language Spoken at Home		Total
Thai:		195	Other Native North American languages:		17
	Speak English "very well"	150		Speak English "very well"	17
	Speak English less than "very well"	45		Speak English less than "very well"	0
Laotian:		53	Hungarian:		17
	Speak English "very well"	26		Speak English "very well"	9
	Speak English less than "very well"	27		Speak English less than "very well"	8
Vietnamese:		945	Arabic:		1104
	Speak English "very well"	325		Speak English "very well"	552
	Speak English less than "very well"	620		Speak English less than "very well"	552
Other Asian languages:		283	Hebrew:		20
	Speak English "very well"	185		Speak English "very well"	10
	Speak English less than "very well"	98		Speak English less than "very well"	10
Tagalog:		4109	African languages:		262
	Speak English "very well"	2702		Speak English "very well"	226
	Speak English less than "very well"	1407		Speak English less than "very well"	36
Other Pacific Island languages:		343	Other and unspecified languages:		445
	Speak English "very well"	259		Speak English "very well"	402
	Speak English less than "very well"	84		Speak English less than "very well"	43
Navajo:		17			
	Speak English "very well"	17			
	Speak English less than "very well"	0			



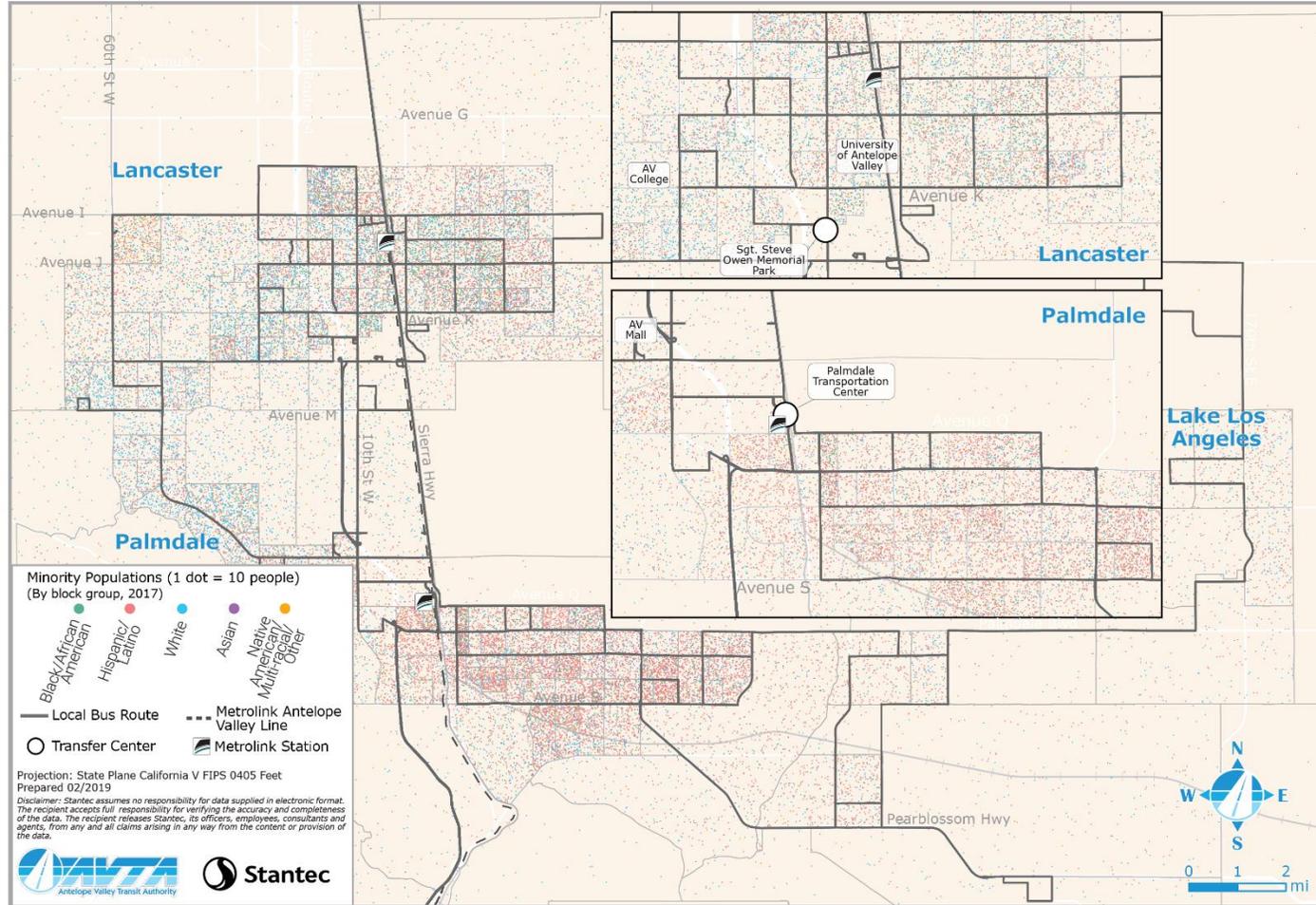


Appendix E | AVTA Low Income and Minority Levels

Antelope Valley Transportation Authority
Median Household Income



Antelope Valley Transportation Authority Minority Populations



Appendix F | AVTA Demographics of Service Area Maps

