



TITLE VI PLAN

TITLE VI, ENVIRONMENTAL JUSTICE, & LIMITED ENGLISH PROFICIENCY



ABSTRACT

Title VI of the Civil Rights Act of 1964 states 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.” Subsequent laws and Presidential Executive Orders added handicap, sex, age, or income status to the criteria for which discrimination is prohibited. The Central Shenandoah Planning District Commission (CSPDC) Title VI Plan for the BRITE Transit Service was developed to ensure the CSPDC is in compliance with nondiscrimination requirements as outlined in Title 23 CFR and 49 CFR and related laws and provides specific information on how to file a nondiscrimination complaint.

This Plan also provides an overview of Environmental Justice and Limited English Proficiency (LEP) concepts, definitions of Title VI and associated nondiscrimination acts, and how Title VI, Environmental Justice and LEP are incorporated into CSPDC programs. Environmental Justice Guidelines and outreach strategies for minority, low-income, and LEP populations are also described.

ACKNOWLEDGEMENTS

This Plan was prepared by the CSPDC for the BRITE Transit Service in cooperation with the Virginia Department of Transportation (VDOT), Virginia Department of Rail and Public Transportation (DRPT), Federal Highway Administration (FHWA), and the Federal Transit Administration (FTA). The contents of this report reflect the views of the CSPDC. The contents do not necessarily reflect the official views or policies of the FHWA, FTA, VDOT, or DRPT. This report does not constitute a standard, specification, or regulation.

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PURPOSE

The Central Shenandoah Planning District Commission (CSPDC), as a recipient of federal financial assistance to provide the BRITE public transit service, is required to comply with Title VI and subsequent nondiscrimination laws, as well as provide an overview of how the CSPDC addresses Executive Order 12898 on Environmental Justice and Executive Order 13166 on Limited English Proficiency (LEP). The purpose of this Title VI Plan is to describe the measures taken by the CSPDC to assure compliance with the rules and regulations associated with Title VI and subsequent nondiscrimination laws, Environmental Justice, and LEP.

Appendix 1 contains copies of the original as well as most recent Resolution Approving and Adopting the update to the CSPDC Title VI Plan.

CENTRAL SHENANDOAH PLANNING DISTRICT COMMISSION

The organization, for which this Title VI Plan is applicable, is the Central Shenandoah Planning District Commission (CSPDC). The CSPDC represents and serves the localities of: the Counties of Augusta, Bath, Highland, Rockbridge, and Rockingham; the Cities of Buena Vista, Harrisonburg, Lexington, Staunton, and Waynesboro; and the Towns of Broadway, Bridgewater, Craigsville, Dayton, Elkton, Glasgow, Goshen, Grottoes, Monterey, Mount Crawford, and Timberville. A Board of representatives from each governmental subdivision oversees the activities of the Commission. Board Members are appointed by the governing body of the member jurisdictions, and representation is based on population, with a majority of the members comprised of local government elected officials. Appendix 2 contains a listing of Commissioners as of April 2020.

The CSPDC works with its member jurisdictions, communities, and agencies to provide high quality planning, technical assistance, and facilitation of services that address local, regional, and state needs. CSPDC serves as administrator and staff to two Metropolitan Planning Organizations (MPO's). Both of these MPO's have approved Title VI Plans, and have been in compliance since their beginnings. The SAWMPO Plan was most recently amended and approved on May 1, 2019, and the HRMPO Plan was most recently amended and approved on May 16, 2019.

Since 2014, the CSPDC has been the designated recipient of federal and state transit grant funds, and is responsible for the administration and management of the local fixed route and paratransit service known as BRITE. Transit service is provided under a turnkey contract with a private, not-for-profit transportation provider. The turnkey contract requires that the service provider ensure that their policies, programs, and practices are performed in a manner that is nondiscriminatory as required under Title VI, and that their staff training plan includes modules dedicated to Title VI Procedures.

The CSPDC has historically received and administered Federal grant funding and continues to administer numerous Federal and State grants for its member jurisdictions. These grants are received from Federal agencies including the Departments of Agriculture, Commerce and Economic Development, Housing and Urban Development, Energy, and Homeland Security; and the CSPDC acts as the direct recipient of Federal Transit Administration Formula Grants such as those under Statute 5307.

The following Title VI Compliance language is posted on the CSPDC website, Transportation Planning webpage, and the SAWMPO and HRMPO websites:

Title VI of the Civil Rights Act of 1964 provides that no person shall on the grounds of race, color, national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal funds. Title VI requires recipients of Federal funds to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. Please click the following for information regarding the [Title VI Complaint Form](#), [Non-Discrimination Statement](#), [Notice under the Americans with Disabilities Act](#), and [Discrimination Complaint Procedures](#).

ANNUAL TITLE VI CERTIFICATION AND ASSURANCE

In accordance with 49 CFR Section 21.7, the CSPDC submits the FTA Civil Rights Assurance annually stating that the applicant will carry out the program in compliance with Title VI of the Civil Rights Act of 1964.

INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits federal agencies, recipients, and sub-recipients of federal funds from discriminating, on the basis of race, color or national origin, against participants or clients of programs that receive Federal funding. Subsequent laws and Presidential Executive Orders added handicap, sex, age, or income status to the criteria for which discrimination is prohibited. This document addresses prohibition of discrimination as mandated by Title VI as well as by the authorities listed in the following section.

In addition to nondiscrimination, this document provides information regarding two Presidential Executive Orders pertaining to fairness and inclusiveness. Executive Order 12898 mandates that federal agencies address equity and fairness, or Environmental Justice, toward low-income and minority persons and populations. Executive Order 13166 mandates that federal agencies ensure that people who have Limited English Proficiency (LEP) have meaningful access to federally-conducted and/or funded programs and activities. Detailed Environmental Justice guidelines and outreach strategies for minority, low-income, and LEP populations to comply with Executive Order 12898 and Executive Order 13166 are included within the Public Outreach and Involvement section below.

The CSPDC administers and manages the BRITE public transportation program for the Staunton-Augusta- Waynesboro area through a turnkey contract with a private operator. The contractor operates fixed- route bus service and Americans with Disabilities Act (ADA) paratransit service.

The CSPDC is committed to a policy of non-discrimination in the conduct of its business, including its Title VI responsibilities. The CSPDC and its contractors will deliver equitable and accessible transportation services. The CSPDC will utilize its best efforts to assure that no person 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 its program of transit service delivery and related benefits. This program for CSPDC provides information to reflect compliance with Title VI of the Civil Rights Act of 1964; Title 59, Chapter 53, Section 5332 of the United States Code and the Federal Transit Administration's circular 4702.1A, "Title VI Program Guidelines for Federal Transit Administration Recipients", dated May 13, 2007. Limited English Proficient Persons (LEP) Guidance prepared by FTA and published April 13, 2007 was utilized for this program.

Toward this end, it is the CSPDC's objective to:

1. Operate its transportation service and programs without regard to race, color, or national origin;
2. Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;
3. Promote the full and fair participation of all affected populations in transportation decision making;
4. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;
5. Ensure meaningful access to programs and activities by persons with limited English proficiency.

The Executive Director of the CSPDC has the responsibility for carrying out the CSPDC's commitment to this program and is responsible for the promotion and operations of the program and the

investigation of Title VI complaints. All managers, supervisors, and employees share in the responsibility for making the program a success.

TITLE VI AND OTHER NONDISCRIMINATION AUTHORITIES

Title VI is usually referred to in the context of federal nondiscrimination laws. Title VI is one of eleven titles included in the Civil Rights Act of 1964. The following is a list of all of the Civil Rights Act titles:

- | | |
|---|--|
| • Voting Rights | • Equal Employment Opportunity |
| • Public Accommodation | • Registration and Voting Statistics |
| • Desegregation of Public Facilities IV | • Intervention and Procedure after Removal in Civil Rights Cases |
| • Desegregation of Public Education | • Establishment of Community Relations Service |
| • Commission on Civil Rights | • Miscellaneous |
| • Nondiscrimination in Federally Assisted Programs and Activities | |

Title VI “declares it to be the policy of the United States that discrimination on the ground of race, color, or national origin shall not occur in connection with programs and activities receiving federal financial assistance and authorizes and directs the appropriate federal departments and agencies to take action to carry out this policy.” Any organization that receives Federal funds is bound to comply with Title VI.

Since the Civil Rights Act of 1964, other nondiscrimination laws have been enacted to expand the range and scope of Title VI coverage and applicability:

- **The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970** prohibit unfair and inequitable treatment of persons displaced or whose property will be acquired as a result of federal-aid programs and projects.
- **The Federal Aid Highway Act of 1973** states that no person shall, on the grounds of sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance under this title or carried on under this title.
- **Section 504 of the Rehabilitation Act of 1973** states that no qualified handicapped person shall, solely by reason of his handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity that receives or benefits from federal financial assistance. This Act protects qualified individuals from discrimination based on their disability.
- **The Age Discrimination Act of 1975** states that no person shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. This act prohibits age discrimination in Federally Assisted Programs.
- **The Civil Rights Restoration Act of 1987, P.L.100-209** amends Title VI of the 1964 Civil Rights Act to make it clear that discrimination is prohibited throughout an entire agency if any part of the agency receives federal assistance.
- **The Americans with Disabilities Act (ADA) of 1990** prohibits discrimination against people with disabilities in employment, transportation, public accommodation, communications, and governmental activities.

- [23 CFR Part 200 – Federal Highway Administration regulations: Title VI Program and Related Statutes – Implementation and Review Procedures](#) provides guidelines for implementing the FHWA Title VI compliance program under Title VI of the Civil Rights Act of 1964 and related civil rights laws and regulations, and conducting Title VI program compliance reviews relative to the Federal-aid highway program.
- [49 CFR Part 21 – Nondiscrimination in Federally-Assisted Programs.](#)
- [23 CFR Part 450 – Federal Highway Administration planning regulations.](#)
- [23 CFR Part 771 – Federal Highway Administration regulations, Environmental Impact Procedures.](#)
- [DOT Order 5610.2 on Environmental Justice](#) summarized and expanded upon the requirements of Executive Order 12898 to include all policies, programs, and other activities that are undertaken, funded, or approved by the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), or other U.S. DOT components.
- [The National Environmental Policy Act \(NEPA\) of 1969](#) addresses both social and economic impacts of environmental justice. NEPA stresses the importance of providing for “all Americans, safe, healthful, productive and aesthetically pleasing surroundings,” and provides a requirement for taking a “systematic interdisciplinary approach” to aid in considering environmental and community factors in decision-making.
- [FHWA/FTA Memorandum Implementing Title VI Requirements in Metropolitan and Statewide Planning](#) - This memorandum provides clarification for field officers on how to ensure that environmental justice is considered during current and future planning certification reviews. The intent of this memorandum was for planning officials to understand that environmental justice is equally as important during the planning stages as it is during the project development stages.

In addition to the laws listed above, two executive orders must be taken into account when ensuring compliance with federal nondiscrimination laws, directives, and mandates:

- [Executive Order 12898 – Environmental Justice \(February 11, 1994\)](#), a presidential mandate to address equity and fairness toward low-income and minority persons/population. Executive Order 12898 organized and explained the federal government’s commitment to promote Environmental Justice. Each federal agency was directed to review its procedures and make environmental justice part of its mission.
- [U.S. DOT Order 5610.2 \(April 15, 1997\)](#) expanded upon Executive Order 12898 requirements and describes process for incorporating Environmental Justice principles into DOT programs, policies, and activities
- [FHWA Order 6640.23 \(December 2, 1998\)](#) – FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.
- [Executive Order 13166 – Limited English Proficiency \(August 11, 2000\)](#), a presidential directive to federal agencies to ensure people who have limited English proficiency have meaningful access to services. Executive Order 13166 ensures federal agencies and their recipients to improve access for persons with Limited English Proficiency to federally-conducted and federally assisted programs and activities.

CENTRAL SHENANDOAH PLANNING DISTRICT COMMISSION

TITLE VI POLICY STATEMENT

The CSPDC is committed to ensuring that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not. Further, under the Americans with Disabilities Act (ADA) of 1990, no entity shall discriminate against an individual with a physical or mental disability in connection with the provision of transportation service.

The CSPDC Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.

The CSPDC Board of Commissioners assigns Bonnie Riedesel, Executive Director, as the organization's Title VI Coordinator. As such, she assumes all duties and responsibilities associated with the program.

To obtain more information on CSPDC's nondiscrimination obligations or to file a Title VI complaint, contact:

Bonnie Riedesel, Executive Director
112 MacTanly Place
Staunton, VA, 24401
540.885.5174
540.885.2687 (fax)

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

Information on non-English alternative formats may be obtained from the CSPDC.



Bonnie Riedesel
Executive Director
CSPDC

April 20, 2020

Date

CENTRAL SHENANDOAH PLANNING DISTRICT COMMISSION TITLE VI COMPLIANCE HISTORY

The Central Shenandoah Planning District Commission (CSPDC) has been the direct recipient and administrator of federal transit funds since 2014, and has planned and managed the BRITE Transit service during that time. There have been no transit-related Title VI investigations, complaints, or lawsuits during the past three years. The 2020 annual summary of Title VI investigations, complaints, or lawsuits is shown in Appendix 3.

ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

The role of CSPDC Title VI Coordinator is the responsibility of the CSPDC Executive Director and is generally responsible for overseeing compliance with applicable nondiscrimination authorities in the transportation planning, programming, development, and operation process. Other staff members are expected to provide information and support to assist this staff member in performing his or her tasks.

RESPONSIBILITIES OF THE TITLE VI COORDINATOR

The Title VI Coordinator is responsible for supervising staff activities pertaining to nondiscrimination regulations and procedures set forth in federal guidance and in accordance with the CSPDC Title VI Plan. In support of this, the Title VI Coordinator will:

- Identify, investigate, and work to eliminate discrimination when found to exist.
- Process discrimination complaints received by the CSPDC. Any individual may exercise his or her right to file a complaint with the CSPDC, if that person believes that he or she or any other program beneficiaries have been subjected to discrimination, in their receipt of benefits/services or on the grounds of race, color, national origin. The CSPDC will make a concerted effort to resolve complaints in accordance with Discrimination Complaint Procedures.
- Meet with appropriate staff members to monitor and discuss progress, implementation, and compliance issues related to the CSPDC Title VI Plan.
- Periodically review the CSPDC Title VI Plan to assess whether administrative procedures are effective, staffing is appropriate, and adequate resources are available to ensure compliance.
- Work with staff and the sub-recipient, to resolve any deficiency status and write a remedial action if necessary, as described in the Consultant Contracts section of this document.
- Review important issues related to nondiscrimination with the CSPDC Commission Chairperson, as needed.
- Maintain a list of Interpretation Service Providers.
- Assess communication strategies and address additional language needs when needed.
- Disseminate information related to the nondiscrimination authorities. The CSPDC Title VI Plan is to be disseminated to CSPDC employees, contractors, the general public, and any of the CSPDC services.
- Coordinate with appropriate federal, state, and regional entities to periodically provide CSPDC employees with training opportunities regarding nondiscrimination.
- Ensure that all new CSPDC employees receive education and training regarding nondiscrimination regulations and procedures as set forth in this plan and in accordance with federal guidance.
- Provide assistance to sub-recipients of FTA financial assistance in complying with the general reporting requirements.
- Monitor sub-recipient compliance with Title VI and other general reporting requirements.

For questions on the CSPDC Title VI Plan and procedures, please contact at (540) 885-5174 or by email at cspdc@cspdc.org. For information on the CSPDC's work programs or publications, please see the CSPDC website at www.cspdc.org.

ANNUAL NONDISCRIMINATION ASSURANCE TO THE FEDERAL TRANSIT ADMINISTRATION

Each year, in preparing for the Annual Report and Updates, the Title VI Coordinator will review the agency's Title VI program to assure implementation of the Title VI plan. In addition, they will review agency operational guidelines and publications, including those for contractors, to verify that Title VI language and provisions are incorporated, as appropriate.

TITLE VI CLAUSES IN CONTRACTS

The CSPDC is responsible for selection, negotiation, and administration of its transit contracts. The CSPDC operates under its internal contract procedures and all relevant federal and state laws.

In all procurements requiring a written contract, CSPDC's contract will include the federal non-discrimination clauses. The Title VI Coordinator will work with the assigned Program Managers to ensure that these clauses are appropriately included in all contracts.

CSPDC staff is responsible for evaluating and monitoring consultant contracts for compliance with nondiscrimination authorities. CSPDC staff will:

- Ensure inclusion of nondiscrimination language in contracts and procurement documents.
- Review consultants for compliance as described below:
 - Ensure that all consultants verify their compliance with nondiscrimination authorities, procedures, and requirements.
 - If a recipient or sub-recipient is found to be not in compliance with nondiscrimination authorities, the Title VI Coordinator and relevant staff will work with the recipient or sub-recipient to resolve the deficiency status and write a remedial action if necessary.
- Review outreach activities to ensure small, disadvantaged, minority, women, and disabled veteran businesses are not excluded to participate in opportunities to compete for consulting contracts.

PROCEDURES FOR ENSURING EQUITY IN SERVICE PROVISION

The CSPDC is responsible for planning and technical assistance for its local governments in the region. To this end, the CSPDC administers regional programs including transportation, economic development, and grant assistance programs, assists with planning activities throughout the region, and provides other services as needed. The CSPDC coordinates with VDOT, DRPT, cities, counties, and area transit agencies; seeks public participation; and provides technical support when needed. An outreach plan for all transportation related CSPDC activities is included in the Public Outreach and Involvement Process below.

The CSPDC and its sub-recipients are required to plan and deliver transportation services in an equitable manner. This means the distribution of service levels and quality is to be equitable between minority and low-income populations and the overall population. The CSPDC has reviewed its service standards and those of its sub-recipients to ensure that those services and benefits are provided in an equitable manner to all persons.

SERVICE STANDARDS

The agency has set standards and policies for BRITE transit that address how services are distributed across the service area to ensure that the distribution affords users equitable access to these services. The agency's services are available to all on a first-come first service basis, without regard for race, color or national origin.

The following system-wide service standards are used to guard against service design or operations decisions from having disparate impacts. All of BRITE's transit services meet the agency's established standards; thus, it is judged that services are provided equitably to all persons in the service area, regardless of race, color, or national origin.

- **Vehicle load** is expressed as the ratio of passengers to the total number of seats on a vehicle at its maximum load point. The following details the current 10 vehicle fleet used in the service and the vehicle load standard for each style or model of bus:

Vehicle Type	Seating Capacity	Standing Capacity	Total Capacity	Maximum Load Factor
One (1) trolley bus	24	8	32	1.3
Three (3) small buses	12	4	17	1.3
Three (3) medium buses	20	6	26	1.3
Two (2) larger buses	26	8	32	1.3
Two (2) extended buses	29	9	38	1.3

Table 1: Vehicle Load

- **Vehicle headway** is the amount of time between two vehicles traveling in the same direction on a given route. A shorter headway corresponds to more frequent service.

Route	Weekday hours	Saturday hours	Weekday headways	Weekend headways
250 Connector	7:30AM – 9:30 PM	8:30AM – 7:30 PM	60 minutes	60 minutes
Downtown Trolley (May-Oct)	10:0AM – 9:00PM	10:00AM – 6:00PM	30 minutes	30 minutes
Downtown Trolley (Nov-Apr)	10:0AM – 6:00PM	10:00AM – 6:00PM	30 minutes	30 minutes
Saturday Night Trolley	N/A	6:00PM – 9:00PM	N/A	60 minutes
North Loop	8:00AM – 8:30PM	8:00AM – 5:30PM	60 minutes	N/A
West Loop	8:30AM – 9:00PM	8:30AM – 6:00PM	60 minutes	N/A
Waynesboro	6:30AM – 6:30PM	7:30AM - 8:22PM	60 minutes	N/A
Stuarts Draft Link	6:50AM – 6:43PM	N/A	60 minutes	N/A
BRCC South (Mon-Thurs)	7:15AM – 10:30PM	N/A	60 minutes	N/A
BRCC South (Fri)	7:15AM – 7:30PM	N/A	60 minutes	N/A
BRCC North (Mon-Thurs)	6:50AM – 11:00PM	N/A	60 minutes	N/A
BRCC North (Fri)	6:50AM – 8:00PM	N/A	60 minutes	N/A

Table 2: Vehicle Headway

Scheduling involves the consideration of a number of factors including: ridership productivity, density of transit-dependent population and activities, and demand for services. Recommended vehicle headways were established in the development of the BRITE Transit Development Plan.

- **On-time performance** is a measure of runs completed as scheduled. A vehicle operating in BRITE service is considered on time if it departs a scheduled time point no more than 1 minute early and no more than 5 minutes late. BRITE's on-time performance objective is 90% or greater. The contracted provider of the service utilizes a GPS based schedule monitoring service to ensure that buses are meeting the on-time performance standard. Additionally, on-time performance is continuously monitored through dispatch and daily driver reports, and is reviewed by supervisory staff, and provided to CSPDC staff on a monthly report. In situations where the reports indicate that a specific bus/route does not meet the performance standard, schedule time points may require adjustment. Unanticipated delays caused by roadway incidents or weather are communicated to transit patrons through the website service alerts and social media.
- **Service Availability** is a general measure of the distribution of routes within a transit provider's service area or the span of service. The standard for service availability has been established by the needs of the community for public transportation. BRITE distributes transit service so that 80% of all residents in the service area are within a ½ mile walk to bus service.

SERVICE AND OPERATING POLICIES

The CSPDC's service and operating policies also ensure that operational practices do not result in discrimination on the basis of race, color, or national origin.

- **Distribution and Siting of Transit Amenities** - Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public and are located throughout the transit system. The CSPDC encourages and works with the local jurisdictions to site benches and bus shelters. Future passenger amenities such as provision of information, Intelligent Transportation Systems (ITS), when available, will be sited equally across the system, when funding for these amenities is available.
- **Vehicle assignment** - Vehicle assignment refers to the process by which transit vehicles are placed into service and on routes throughout the system. The BRITE turnkey contractor assigns vehicles with the goal of providing equitable benefits to all riders. Vehicles are assigned with regard to service type (deviated fixed-route or paratransit) and ridership demand patterns (routes with greater numbers of passengers need vehicles with larger capacities). For each type of assignment, vehicles are rotated to ensure that no single route or service always has the same vehicle. Currently, the BRITE transit service utilizes all buses of the same age, and vehicles are monitored and assigned to ensure that mileages are relatively equal.
- **Monitoring of Sub-recipients**– There are no sub-recipients involved in the provision of the transit service.

SERVICE PLANNING AND MANAGEMENT

CSPDC staff is responsible for evaluating and monitoring compliance with applicable nondiscrimination authorities in all aspects of the BRITE transit service.

CSPDC staff will:

- Ensure that all aspects of the planning and programming process operation comply with nondiscrimination authorities.
- Prepare and update a demographic profile of the region using the most current and appropriate statistical information available on race, income, and other pertinent data.
- Make the document available to the public and member agencies on the CSPDC website or in hard copy format, if requested.
- Continue to ensure that staff makes concerted efforts to involve members of all social, economic, and ethnic groups in the planning process.

ENVIRONMENTAL JUSTICE

On February 11, 1994, President William J. Clinton signed *Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, which directs federal agencies to develop strategies to help them identify and address disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority and low-income populations. The Executive Order was also intended to provide minority and low-income communities with access to public information and opportunities for public participation in matters relating to human health or the environment.

Adverse effects as described in Executive Order 12898 is the totality of significant individual or cumulative human health or environmental effects, including interrelated social and economic effects, which may include, but are not limited to:

- Bodily impairment, infirmity, illness, or death.
- Air, noise, and water pollution and soil contamination.
- Destruction or disruption of:
 - Man-made or natural resources
 - Aesthetic values
 - Community cohesion or a community's economic vitality
 - The availability of public and private facilities and services
- Adverse employment effects.
- Displacement of persons, businesses, farms, or non-profit organizations.
- Increased traffic congestion, isolation, exclusion, or separation of minority or low-income individuals within a given community or from the broader community.
- Denial of, reduction in, or significant delay in the receipt of benefits of the CSPDC programs, policies, or activities.

Environmental Justice joins social and environmental movements by addressing the unequal environmental burden often borne by minority and low-income populations. The right to a safe, healthy, productive, and sustainable environment for all, where "environment" is considered in its totality to include the ecological (biological), physical (natural and built), social, political, aesthetic, and economic environments.

Environmental Justice helps to ensure that programs, policies, and activities that have adverse effects on communities do not affect minority and low-income populations disproportionately. To prevent discrimination as described in Executive Order 12898, the Federal Highway Administration *Order 6640.23 Order to Address Environmental Justice in Minority Populations and Low-Income Populations* dated December 2, 1998 defines minority and low-income individuals and populations as follows:

- **Minority** – a person who is Black, Hispanic, American Indian and Alaskan Native, or Asian American:
 - Black – a person having origins in any of the black racial groups of Africa.
 - Hispanic – a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.

- American Indian and Alaskan Native – a person having origins in any of the original people of North America and who maintains cultural identification through tribal affiliation or community recognition.
- Asian American – a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific islands.
- **Minority Population** – any readily identifiable groups of minority persons who live in geographic proximity, and if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed program, policy, or activity.
- **Low-Income** – a person whose household income is at or below the United States Department of Health and Human Services poverty guidelines.
- **Low-Income Population** – any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who would be similarly affected by a proposed program, policy or activity.

ENVIRONMENTAL JUSTICE FOR CONSTRUCTION PROJECT

Environmental Justice is incorporated through all phases of the transportation planning, programming, development, and operation process. The CSPDC Environmental Justice Process includes identification of underserved communities, outreach strategies, benefits/burdens methodologies, and an evaluation component. Maps displayed in the Public Outreach and Involvement section of this report display those identified populations. For new construction and major rehabilitation/renovation projects where National Environmental Policy Act (NEPA) documentation is required, the CSPDC will integrate an environmental justice analysis into the NEPA documentation for submission to FTA. The development of environmental justice analyses is the responsibility of the CSPDC Transportation Program Manager.

The CSPDC will conduct an equity analysis for any projects which require land acquisition and the displacement of persons from their residences and businesses regardless of whether NEPA documentation is required or not. For purposes of this requirement, “facilities” does not include bus shelters, transit stations, or power substations, etc.

The CSPDC has not undertaken any construction projects during the past three years nor does it expect to over the next three years. As a result, no fixed-facility impact analyses have been conducted during the reporting period.

LIMITED ENGLISH PROFICIENCY PLAN

On August 11, 2000, President William J. Clinton signed *Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency*. The Executive Order requires federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them. The Executive Order also requires that federal agencies work to ensure that recipients of federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English can be limited English proficient, or “LEP.” For an LEP individual, language can present a barrier to accessing benefits and services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally funded programs and activities. These individuals may be entitled to language assistance at no cost to them with respect to a particular type of service, benefit, or encounter.

The United States Department of Transportation (USDOT) guidelines require that recipients of federal financial assistance provide “meaningful access to programs and activities” by giving LEP persons adequate and understandable information and allowing them to participate in programs and activities, where appropriate. Recipients of federal funds must take reasonable steps to remove barriers for LEP individuals. While designed to be a flexible and fact-dependent standard, the starting point is an individualized assessment that balances the following four factors:

1. Demography: number and/or proportion of LEP persons served and languages spoken in CSPDC Transit Region.
2. Frequency: rate of contact with service or program.
3. Importance: nature and importance of program/service to people’s lives.
4. Resources: available resources, including language assistance services.

The four-factor analysis should be used to determine which language assistance services are appropriate to address the identified needs of the LEP population. More information regarding the identification of LEP individuals within the community as well as outreach strategies are included within the Public Outreach and Involvement section below.

ASSESSMENT OF NEEDS AND RESOURCES

The need and resources for the LEP language assistance were determined through a four-factor analysis as recommended by FTA guidance.

FACTOR 1: ASSESSMENT OF THE NUMBER AND PROPORTION OF LEP PERSONS LIKELY TO BE SERVED OR ENCOUNTERED IN ELIGIBLE SERVICE POPULATION

The agency has reviewed Census data on the number of individuals in its service area that have LEP, as well as the languages they speak.

U.S. CENSUS DATA – AMERICAN COMMUNITY SURVEY 5 YEAR DATA 2018

Data from the U.S. Census Bureau's American Community Survey (ACS) were obtained through www.census.gov for the CSPDC Transit Region. Information from the 2018 ACS also provides more detail on the specific languages that are spoken by those who report that they speak English less than very well. Languages spoken at home by those with LEP are presented below. These data indicate the extent to which translations into other language are needed to meet the needs of LEP persons.

This data will be used to determine how best to disseminate information that is accessible to persons with LEP. According to the U.S. Census 2018 ACS, there were 110,097 people, or 96.0% of the CSPDC Transit Region, who spoke English only. Table 1 shows these figures in detail, broken down by locality. The LEP four factor analyses shows that 684 people, or approximately 0.6% of the total Transit Region population, do not speak English “well” or “at all.” Based on the relatively low percentage, the need to address the LEP population is somewhat limited.

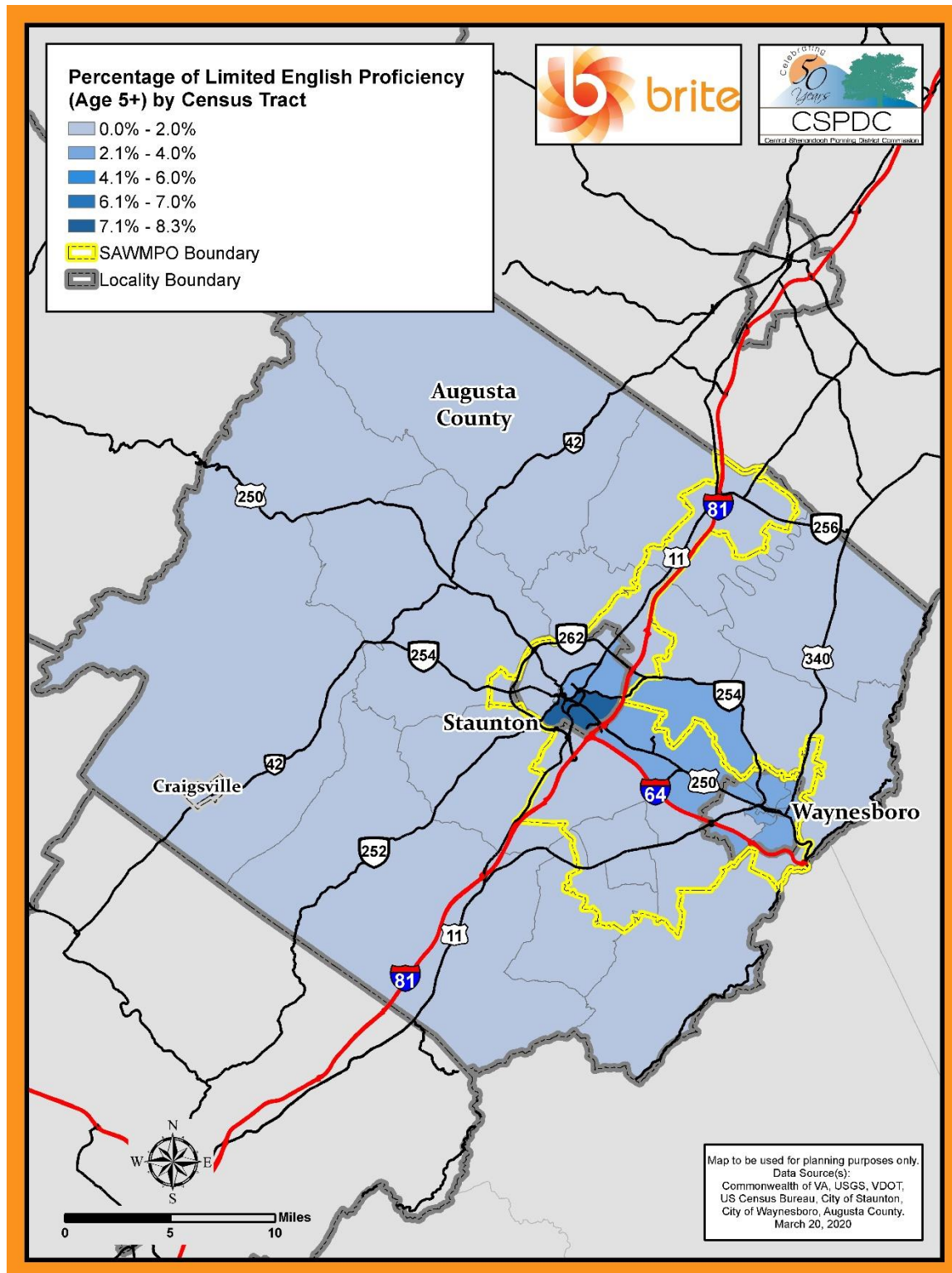
CSPDC Transit Program Area: Language Use & English-Speaking Ability for the Population 5 Years & Older											
	Total Population 5 years +	Speak only English at Home	Speak language other than English at home	Spanish		Other Indo- European Languages		Asian and Pacific Island Languages		Other Languages	
				Speak English “Very Well”	Speak English “Not Well”	Speak English “Very Well”	Speak English “Not Well”	Speak English “Very Well”	Speak English “Not Well”	Speak English “Very Well”	Speak English “Not Well”
Augusta County	71,205	69,146	2,059	862	249	38	24	95	20	0	0
City of Staunton	23,011	21,798	1,213	171	49	56	21	110	36	142	67
City of Waynesboro	20,520	19,153	1,367	762	195	0	0	81	23	35	0
Total	114,736	110,097	4,639	1,795	493	94	45	286	79	177	67

Table 3: CSPDC Transit Program Area: Language Use & English-Speaking Ability for the Population 5 Years & Older

The Spanish speaking classification makes up approximately 59.0% of the population that speaks a language other than English at home, making it by far the largest LEP group in the region. Therefore, the CSPDC's focus will be on targeting this community. Language assistance will be made available to other limited English-speaking individuals in the community as the need arises.

Figure 1 displays the LEP populations by US Census Tracts located within the CSPDC Transit Region. There are 24 census tracts within the CSPDC Transit Region. Of these, one census tract located in Staunton contains a LEP population concentration of greater than 4%. Seven other census tracts have populations greater than 2%. These areas will be a focus of LEP language assistance programs as necessary.

FIGURE 1: CSPDC TRANSIT REGION LIMITED ENGLISH PROFICIENCY FOR THE
POPULATION
5 YEARS AND OLDER



FACTOR 2: ASSESSMENT OF THE FREQUENCY WITH WHICH LEP INDIVIDUALS COME INTO CONTACT WITH THE TRANSIT SERVICES OR SYSTEM

The CSPDC reviewed the relevant benefits, services, and information provided by the agency and determined the extent to which LEP persons have come into contact with these functions through the following channels:

- Calls to the CSPDC's offices;
- Visits to the CSPDC's office;
- Access to the CSPDC's website;
- Attendance at community meetings or public hearings hosted by the CSPDC;
- Contact with BRITE transit vehicle operators;
- Contact with BRITE transit supervisory and administrative staff;
- Public involvement and public engagement meetings/hearings for projects affecting LEP communities or individuals; and
- Internet access: CSPDC and BRITE Website(s) must be accessible to LEP persons. The BRITE website (<https://www.britebus.org>) includes Google Translate™ for all pages and forms, including schedules.

The CSPDC, at the time of this document, has not been contacted by any LEP individuals regarding projects or programs the CSPDC administers.

The CSPDC will continue to identify emerging populations as updated Census and American Community Survey data become available for our service area. In addition, when LEP persons contact our agency, we attempt to identify their language and keep records on contacts to accurately assess the frequency of contact. To assist in language identification, we use a language identification flashcard based on that which was developed by the U.S. Census (<http://www.lep.gov/ISpeakCards2004.pdf>).

FACTOR 3: ASSESSMENT OF THE NATURE AND IMPORTANCE OF THE TRANSIT SERVICES TO THE LEP POPULATION

The CSPDC considers BRITE transit to be an increasingly important and essential service for many people living in our service area. As the service continues to grow, ongoing, effective communication of the availability of transit service will continue to be a focus of the CSPDC. Currently, the CSPDC meets regularly with community organizations, human service agencies, medical providers, and the local jurisdictions to identify any LEP's inability to access or utilize public transit to travel to employment sites, medical services, educational facilities, and quality of life related destinations. The CSPDC has evaluated effective communication channels for the community, including the LEP population. A website and printed material (maps and timetables of service) include information in Spanish, and also contact information for those who require additional assistance. Additionally, the turnkey Contractor includes sensitivity training for bus drivers, which includes instructions to use printed material and maps to assist passenger on the bus to help them understand or point to the routes or destination on the schedule. Community service groups also assist passengers by writing their destination on paper to give to the bus drivers.

FACTOR 4: ASSESSMENT OF THE RESOURCES AVAILABLE TO THE AGENCY AND COSTS

COSTS

The only language assistance measure currently being provided by the CSPDC includes the Spanish-language announcements of public involvement activities. Costs for these services are minimal \$500 - \$1,000 depending on the number of public involvement activities that occur in any given year. We do not expect these costs to increase in the future.

Based on the analysis of demographic data and contact with community organizations and LEP persons, the CSPDC has determined that there is no need to expand our services at this time. However, when projects are based in areas identified as high LEP population, additional outreach or accommodations may be necessary. These may include translation of project information into additional languages and/or additional oral language services (interpreters) provided at public meetings. These could increase the project budget by up to \$2,000 when necessary.

RESOURCES

The CSPDC provides flexibility in the BRITE transit program and could devote additional funds to language assistance expenses in certain cases that would provide meaningful benefit to LEP populations. As discussed this would be determined on an as needed basis related to projects that may impact those identified LEP populations.

In addition, assistance may be available through community organizations, city or county departments, or other agencies that may be able to partner for language assistance services. In the past, the language department at James Madison University has provided translation services on an as needed basis to the CSPDC at a reasonable cost. The CSPDC also has access to and uses free language assistance products available through the web such as Google Translate™ that may be used to translate written phrases, documents, and websites for free.

LEP IMPLEMENTATION PLAN

As discussed above, approximately 0.5% of the CSPDC Transit Region's residents are considered LEP with the highest concentration in an area near downtown Staunton. Considering the small size and scope of the BRITE transit region, low number of LEP individuals in the region, and limited financial resources, it is necessary to provide only the most basic and cost-effective services available to ensure compliance with Executive Order 13166. Many options were discussed and considered by CSPDC staff and the following recommendations were adopted as measures to provide meaningful access to limited English-speaking persons:

- **Language assistance measures currently used or that are planned to be used:**
 - Provide instructions to vehicle operators and dispatch who regularly interact with the public on how to respond to an LEP customer as needed (new hire, departmental meetings). Drivers interviewed said they are usually able to ask another passenger on the bus to help them understand or point to the routes or destination on the schedule. Community service groups also help passengers by writing their destination on paper to give to the bus drivers.
 - With advance notice of five business days, provide interpreter services at any meeting or public hearing. This will include foreign language and hearing-impaired interpreter services.

- Place statements in notices and publications that interpreter services are available for meetings, with five business days advance notice.
 - Place notices of BRITE and CSPDC's non-discrimination policies and information on the local and federal complaint process on the website in English and other languages via Google Translate™ and make the notices available at public meetings.
 - Translate vital documents in languages other than English (primarily Spanish) when there is potential for impact to LEP communities. These documents are all available on the BRITE website and can be translated by Google Translate™. These include:
 - Bus schedules and maps
 - Route service changes
 - Meeting and public hearing notices
 - Transportation planning documents
 - Annual reports
- **Staff Training Plan**

In an effort to continuously improve the CSPDC's overall compliance posture, nondiscrimination training will be coordinated with FTA, FHWA, VDOT, DRPT, and the local transit provider, and made available to CSPDC staff on an ongoing basis to ensure up-to-date knowledge of Title VI and other nondiscrimination statutes. Under the category of education and training, nondiscrimination responsibilities include:

- Distribution of information to CSPDC staff on training programs regarding Title VI and related statutes.
- Tracking staff participation in nondiscrimination training.
- Maintain and update nondiscrimination training as necessary.
- Maintain and update the CSPDC Title VI Plan as necessary.

Staff members should know their obligations to provide meaningful access to information and services for LEP persons. The following training will be provided to all staff:

- Information on the CSPDC's Title VI Policy and LEP policies, procedures, and responsibilities is disseminated to agency employees, contractors, and beneficiaries, as well as to the public.
- Description of language assistance services offered to the public. All CSPDC staff is provided with a list of available language assistance services and additional information and referral resources, updated annually.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.
- How to work effectively with in-person and telephone interpreters and handle a potential phone call or in person contact with an LEP individual.
- CSPDC staff will also take advantage of any "outside" training provided by FTA, Virginia Department of Rail and Public Transportation, the MPO, or the localities.
- The CSPDC's employees will receive training on Title VI policies and procedures upon hiring and promotion. This training will include requirements of Title VI, CSPDC obligations under Title VI, required data that must be gathered and maintained and

how it relates to the Annual Report, and any findings and recommendations from the last FTA compliance review.

- Training will be provided when any Title VI related policies or procedures change (agency wide training), or when appropriate in resolving a complaint (specific individual or agency wide). Title VI training is the responsibility of the assigned Title VI Coordinator.
- All BRITE service delivery new hires receive training on assisting LEP persons as part of their sensitivity and customer service training. This includes: a summary of the agency's responsibilities under DOT LEP Guidance; summary of the agency's language assistance plan; summary of the number and proportion of LEP persons in the agency's service area, the frequency of contact between the LEP population and the agency's programs and activities, and the importance of these to the population; description of the type of language assistance that the agency is providing and instructions on how staff can access these services; description of agency's cultural sensitivity policies and practices.
- All BRITE staff who routinely come into contact with customers, as well as their supervisors and management, received annual refresher training on policies and procedures related to assisting LEP person. Employees are also encouraged to learn basic phrases in Spanish for addressing common concerns of passengers.
 - The BRITE transit service is provided by CSPDC through a turnkey contract. Under the terms of the contract, the Contractor is required to provide training to all staff members involved with the delivery of the BRITE transit service on the CSPDC Title VI Program, and to insure LEP training for drivers and other employees who interact with the transit public.
 - At a minimum, the Contractor's employees, including managers, supervisors, vehicle operators and customer service and dispatch staff, receive training on Title VI policies and procedures, and specifically on dealing with LEP populations. This training is conducted upon hiring and during monthly mandatory training meetings. Training begins with a two-day classroom orientation that includes instruction of customer service policies and procedures related to Title VI and skills related to effective interaction with LEP populations who use the BRITE system. This training includes familiarization with Central Shenandoah Planning District Commission's Title VI Plan, including LEP requirements. In addition, training is provided when any Title VI-related policies or procedures change, or when appropriate related to an inquiry or a complaint.
 - The ongoing training of approximately 32 hours per year is provided through various methods including but not limited to; video or PowerPoint presentations, guest speaker, hands on, and interactive participation.
 - Under the terms of the operating contract, CSPDC staff participate in Contractor training sessions to ensure that the LEP training takes place, and that a staff resource is available to drivers who are unable to communicate adequately with LEP transit riders.

- **Providing Notice to LEP Persons**

The CSPDC will follow these measures to notify LEP persons of language assistance services available:

- The CSPDC will work with community-based organizations and other stakeholders to inform LEP individuals of the BRITE services;
 - Provide translation of the BRITE website.
 - The public may call CSPDC staff at 540-885-5174 to request additional assistance.
- **Methods for Monitoring, Evaluating, and Updating the Plan**

The CSPDC will update the LEP Plan as needed, and at a minimum every three years, as part of the Title VI submission. The plan will be reviewed annually and updated as a result of the review or when it is clear that higher concentrations of LEP individuals are present in the area served. Monitoring and evaluating the plan will allow the CSPDC to track outreach efforts to help improve future efforts. Updates will include the following:

- Information from drivers and dispatchers to evaluate if the number of LEP person contacts encountered is increasing.
- How the needs of LEP persons have been addressed based on feedback received.
- Determination of the current LEP population in the service area by using Census data.
- 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 through outreach to community organizations. In addition, periodic surveys related to transit planning efforts, focus groups, community meetings, internal meetings with staff who assist LEP persons, review of updated Census data, formal studies of the adequacy and qualities of the language assistance provided, and determine changes to LEP needs.
- Determine whether the CSPDC fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.
- Maintain a Title VI complaint log, including LEP to determine issues and basis of complaints. This log will be maintained as part of the Civil Rights Database.
- Include a LEP policy in the updates of the any transportation planning process through, 1) statements and notices that interpreters will be provided, upon prior request for language assistance as well as for sign language, and 2) maintenance of a contact list for interpretation and translation providers.
- In preparing the triennial update of this plan, CSPDC will conduct an internal assessment using the Language Assistance Monitoring Checklist provided in the FTA's "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers."

Based on the feedback received from community members and agency employees, CSPDC will make incremental changes to the type of written and oral language assistance provided as well as to their staff training and community outreach programs. The cost of proposed changes and the available resources will affect the enhancements that can be made, and therefore CSPDC will attempt to identify the most cost-effective approaches.

As the community grows and new LEP groups emerge, CSPDC will strive to address the needs for additional language assistance.

PUBLIC OUTREACH AND INVOLVEMENT PROCESS

The CSPDC acts as administrator for the Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO) which oversees the continuing, cooperative, and comprehensive (“3-C”) transportation planning process for the region in which the BRITE transit service operates. The SAWMPO develops the regional Transportation Improvement Program (TIP), the Long-Range Transportation Plan, assists the member jurisdictions with development of their transportation planning documents, provides all public transportation planning needs, promotes multi-modal transportation options for the region, and provides other services as needed. The SAWMPO performs this work through an appointed Policy Board and Technical Advisory Committee.

A complete record of all public outreach and involvement activities is maintained.

PUBLIC PARTICIPATION PLAN

Through the SAWMPO, the public, city, and county governments, and local non-governmental organizations, as well as transit employees, are given the opportunity for community involvement and are able to share information about our service, programs, and plans. The CSPDC adheres to the SAWMPO Public Participation Plan, amended and approved May 1, 2019, to guide the public outreach and involvement process for the BRITE transit program. This plan describes procedures for inclusive public participation that ensures access to low-income and minority populations to the transit agency’s activities and programs. The SAWMPO Public Participation Plan is included in Appendix 4. All planning activities relevant to the BRITE public transit program are administered through the SAWMPO.

Public outreach and participation are vital to transit service planning efforts. The goal is to provide early and ongoing notification to the public related to any actions or decisions related to service delivery, routes, stops and schedules, and fare structures. In seeking public comment and review, CSPDC makes a concerted effort to reach all segments of the population, including people from minority and low-income communities, persons with limited English proficiency, and organizations representing these and other protected classes.

Outreach and public comments are received through written comments and public meetings allowing discussion and / or a public comment period. The opportunity for public comment related to BRITE transit service will be communicated by:

- Publishing notices within local newspapers, including those publications targeted at minority, low income and LEP persons.
- Publishing notices on the CSPDC, SAWMPO and BRITE websites.
- Posting public notices in all transit vehicles.
- Sending news releases to news media (newspapers, radio, television, web media) of general interest, those targeted at minority and LEP persons, as well as, community-based organizations that serve persons protected under Title VI and which publish newsletters or provide electronic communication.
- Conducting periodic customer satisfaction surveys which are distributed to passengers on transit vehicles and available for completion electronically.

The following Title VI outreach activities have been completed or are ongoing:

- A BRITE Transit Advisory Committee (BTAC) guides CSPDC staff on planning and administrative activities of the BRITE Transit Service. Membership on the BTAC represents the local funding partners: Staunton, Waynesboro, Augusta County, Augusta Health, Wilson Workforce Rehabilitation Center, Blue Ridge Community College, Social Services, Staunton Downtown Development Association, and two BRITE riders appointed at large. Meetings of the BTAC occur at a minimum of six times per year, and notice of meetings are advertised in the local newspapers and on the CSPDC and BRITE websites. Agendas and meeting minutes are posted to the website(s) and are also available in hardcopy, upon request. All meetings of the BTAC are open to the public and include a public comment opportunity. Appendix 5 contains a listing of BTAC members as of March, 2020.
- The CSPDC Executive Director, who is also the Title VI Coordinator, along with CSPDC staff participated in VDOT and FHWA Title VI training sessions in 2020.
- CSPDC completed a full review of the turnkey contractor's operator training in 2017, including the Title VI training modules. Additionally, Title VI discussions are incorporated in driver meetings.
- CSPDC staff monitors BRITE transit vehicle deployment to ensure that service standards are met.
- A BRITE Transit Development Plan was developed and adopted in August, 2016. This planning effort included a passenger and a public survey related to transit service delivery and transit needs. The availability of the survey was communicated through press releases to the local newspapers, including the Harrisonburg Spanish newspaper; notices on CSPDC and all local jurisdiction websites, including the availability of surveys in Spanish, upon request.
- As part of the planned improvements to the Waynesboro Circulator transit route, a public information meeting was conducted and input was solicited before finalizing the bus stops. The meeting was advertised in local newspapers, on the CSPDC website, and notices were posted on the buses in advance of the meeting. The meeting was held at the Waynesboro City Hall, which is accessible by transit, and is fully ADA accessible. A Spanish speaking translator was present at the public information meeting.
- A new BRITE (<https://www.britebus.org>) website was introduced in July, 2018 providing transit information. This website included Google Translate™ for all information and documents.
- CSPDC staff participates in the Community Health Forum, which brings community agencies, health care providers, and interested citizens together to identify and address the health care needs of our community. This group gathers regularly to share information and resources. Through the activities of the Forum participants, individuals or populations requiring access to transit services may be identified.

INVOLVEMENT WITH COMMUNITY ORGANIZATIONS

The CSPDC is in communication with many organizations throughout the region, and often attends meetings and events sponsored by these groups. These groups consist of cultural organizations, senior organizations, city partners, business associations, and other organizations vested in the CSPDC region. In this arena, we are able to create relevant conversations and dialogue between the CSPDC and the community regarding transit needs. The CSPDC's involvement with community organizations includes conducting in-person outreach upon request at public meetings, community-based organizations, human service organization meetings, cultural centers, and other places and events that reach out to persons protected under Title VI.

PLANNING AND PUBLIC INVOLVEMENT ACTIVITIES

As described in the SAWMPO Public Participation Plan, since transportation has a direct and personal impact on the population of a region and is of critical importance to economic vitality and quality of life, the CSPDC continually endeavors to provide citizens, affected public agencies, and other interested parties with reasonable opportunities to be involved in the transportation planning, programming, development, and operation process. The work of the CSPDC is guided by its Board of Commissioners and specific programs also have other appointed boards guiding their particular mission. The current boards that are involved with the transportation programs this Title VI Plan is being produced for include the CSPDC Board of Commissions, the BTAC, and the SAWMPO Policy Board.

Under 49 USC Chapter 53, Section 5307, the Federal Transit Administration (FTA) requires “a locally developed process to consider public comment before raising a fare or carrying out a major reduction in transportation service.” The public, as the primary customer and beneficiary of transit service, is provided the opportunity for input and review through the public engagement process. Actions such as the establishment of new service, fare adjustments, major modifications of existing service, and/or suspension or abandonment of any bus routes may include a formal process of review by the BTAC, CSPDC and/or the SAWMPO, including meaningful public engagement conducted by staff. The CSPDC uses a broad range of outreach tools documented in the SAWMPO Public Participation Plan to serve this requirement.

Meaningful public engagement may include public hearings, public meetings, distribution of written materials at major transfer points, posting of informational flyers, and the posting of information on the CSPDC and BRITE websites and on social media pages. Notices (signs and brochures) describing proposed action(s), date(s) and location(s) of any hearings or meetings are posted on buses. Notices may be published in major local and/or relevant neighborhood newspapers and on the CSPDC and BRITE websites. Open public meetings and formal public hearings are frequently used in an effort to gain public review and comment. Community organizations, public agencies, and elected officials may be notified by mail of significant service changes. All public comments submitted to the CSPDC through any of these outreach tools become part of the official record. A public comment opportunity is given at each scheduled meeting. Sign language or non-English language interpreters are provided if needed and requested in advance, for any meeting of the BTAC, SAWMPO Policy Board and/or Technical Advisory Committee.

If special accommodation is desired at any public meeting held by the CSPDC, the public can call at least 48 working hours prior to the meeting to arrange the proper accommodations. The CSPDC will provide Spanish translation and offer interpreters for other languages, including sign language, upon request. The CSPDC selects meeting and hearing locations to provide reasonable accommodations in accordance with the Americans with Disabilities Act of 1990. CSPDC public meetings are wheelchair accessible.

Besides actions defined as a fare change or a major reduction in service, the CSPDC has established that any change in service will be the subject of public hearings, meetings, or other reasonable use of meaningful public engagement methods as appropriate to the nature of the proposed change. Public input is solicited while proposals are under consideration. Customers and the public are notified prior to the implementation of any changes in service.

Note: The Communications and Public Participation area applies to and affects the CSPDC work program as a whole, particularly CSPDC efforts and responsibilities related to the Planning and

Programming and Environmental Justice areas. The SAWMPO Public Participation Plan includes specific information regarding outreach and communication strategies and Environmental Justice guidelines. Special emphasis is placed on outreach strategies for minority, low-income, and LEP populations.

A summary of public outreach and involvement activities undertaken and a description of steps taken to ensure all persons have meaningful access to the BRITE transit system and planned projects are noted below.

- The CSPDC notifies the public of Title VI protections by providing information on its website, www.cspdc.org and the BRITE website, www.britebus.org;
- Placing a notification in all revenue service vehicles, in CSPDC offices, and at the BRITE transit facility (Appendix 6 includes example of Title VI Provisions and Notice Under the Americans with Disabilities Act posters on buses);
- Meetings and public hearings are conducted at locations and times that are accessible by public transit;
- Placing the BRITE Title VI statement in the printed bus schedule;
- Periodic customer satisfaction surveys are conducted which are distributed to passengers on vehicles, as well as advertised and available electronically;
- Notices for Public Hearings for the CSPDC, SAWMPO, and BRITE include the offer of sign language or non-English language interpreters;
- Public Notices for the CSPDC, BRITE, and SAWMPO offer sign language or non-English language interpreters. Sample Public Notice included in Appendix 7;
- Notifying the Public of Rights notification is included in Appendix 8;
- For written or spoken translation needs, the CSPDC contracts with the language departments of James Madison University or Bridgewater College.

DEMOGRAPHIC PROFILE

Data from the US Census 2018 American Communities Survey was used to develop a demographic profile of the CSPDC region and identify the locations and needs of socioeconomic groups, including low-income, disabled, LEP, and minority populations.

The CSPDC believes that public input into its process is valuable and makes its products better. Transportation planning cannot, and should not, be based simply upon technical analysis. The qualitative information derived from citizen involvement is essential to good decision-making.

As a matter of CSPDC policy and a requirement of federal law, the transportation planning process must make special efforts to consider the concerns of traditionally underserved communities, including low-income and minority communities. These communities are mapped for the CSPDC Transit Region in Figures 2 and 3.

To reach the largest number of minority and low-income communities throughout the CSPDC region, a geographically focused public participation program will achieve the outcomes described in this plan. In addition to traditional methods of communication, CSPDC will utilize strategies recommended by community members for a specific neighborhood or population group. By partnering with community

groups, CSPDC can cost-effectively extend its reach and help partner organizations provide information that is of interest to groups they represent.

CSPDC will establish and maintain active work relationships with all relevant local media, including minority-based media, in order to communicate pertinent information to the public. CSPDC will coordinate with individual institutions and organizations while implementing community-based public involvement strategies to reach out to members in affected minority and/or low-income communities. CSPDC shall also provide opportunities for public participation through alternative means other than public meetings or written communication; i.e., personal interviews or use of audio or video recording to capture comments as needed for particular projects.

CSPDC staff is responsible for evaluating and monitoring compliance with applicable nondiscrimination authorities in all aspects of the CSPDC public participation process. CSPDC staff members will:

- Ensure that all communications and public participation efforts comply with nondiscrimination authorities.
- Develop and distribute information on nondiscrimination and CSPDC programs to the general public.
- Provide services for individuals with special needs – Upon five business days advance notice, deaf interpreters, translators, and Braille documents can be provided for public meetings. Notifications of opportunities for public participation will include contact information for people needing these or other special accommodations.
- Include contact conformation for people needing these or other special accommodations.
- Include the following statement in all of the CSPDC and BRITE public notices:

“The CSPDC ensures nondiscrimination and equal employment in all programs and activities in accordance with Title VI and Title VII of the Civil Rights Act of 1964. If you have questions or concerns about your civil rights in regards to this project or special assistance for persons with disabilities or limited English proficiency, please contact the CSPDC. Sign language or non-English language interpreters will be provided if needed and requested in advance of this meeting. Please contact the CSPDC at 540-885-5174 to request an interpreter no later than five *business days prior (enter date) to meeting.*>.”
- Include the above Title VI Statement in press releases and on the CSPDC and BRITE websites.

FIGURE 2: CSPDC TRANSIT REGION PERCENTAGE OF MINORITY POPULATION

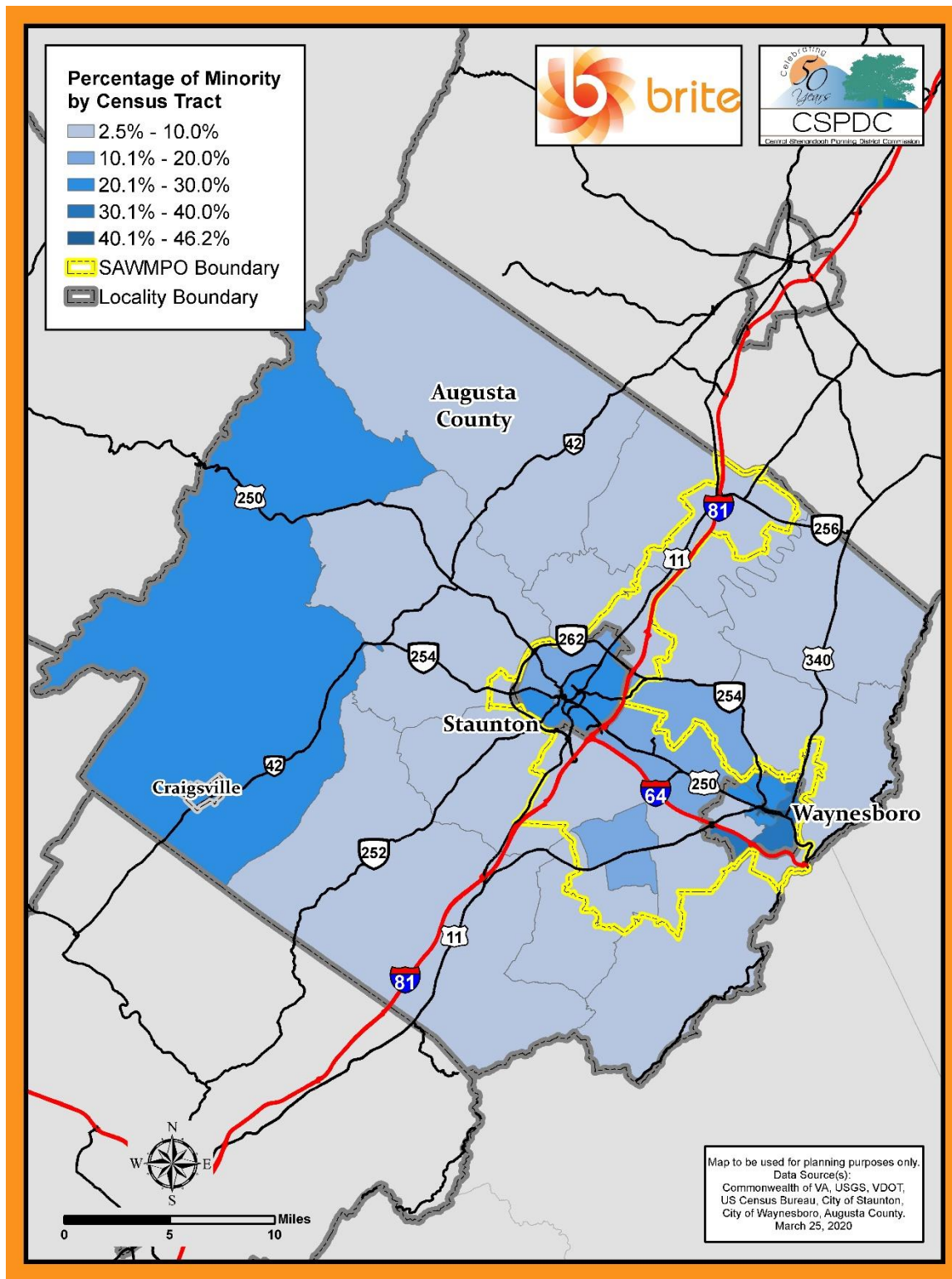
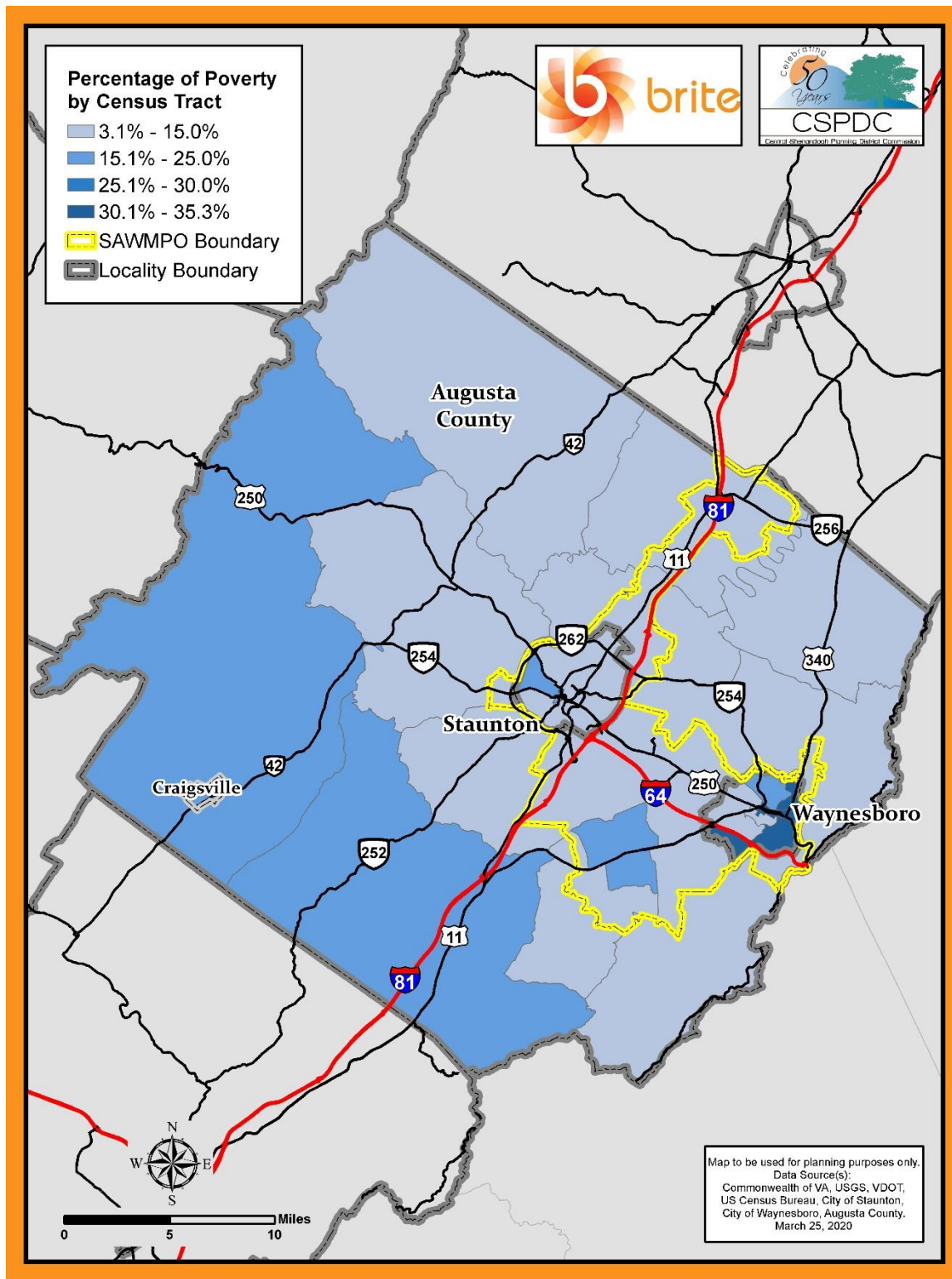


FIGURE 3: CSPDC TRANSIT REGION PERCENTAGE OF LOW-INCOME POPULATION



DISCRIMINATION COMPLAINT PROCEDURES

Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination on the basis of race, color, or national origin. Subsequent laws and Presidential Executive Orders added handicap, sex, age, income status, and limited English proficiency to the criteria for which discrimination is prohibited, in programs and activities receiving federal financial assistance. As a recipient of federal assistance, the CSPDC has adopted a Discrimination Complaint Procedure as part of its Title VI Plan to comply with Title VI and associated statutes.

1. Any person who believes that he or she, individually, as a member of any specific class, or in connection with any disadvantaged business enterprise, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, as amended, or any nondiscrimination authority, may file a complaint with the CSPDC. Instructions for filing Title VI complaints are posted on the agency's website and in posters on the interior of each vehicle operated in passenger service, and are also included within brochures produced by the CSPDC. A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to the CSPDC Title VI Coordinator for review and action.
2. In order to have the complaint considered under this procedure, the complainant must file the complaint no later than 180 days after:
 - a. The date of the alleged act of discrimination; or
 - b. Where there has been a continuing course of conduct, the date on which that conduct was discontinued.

The CSPDC may extend the time for filing or waive the time limit in the interest of justice, specifying in writing the reason for so doing.

3. Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints should set forth as fully as possible the facts and circumstances surrounding the claimed discrimination. In the event that a person makes a verbal complaint of discrimination to an officer or employee of the CSPDC, the person shall be interviewed by the Title VI Coordinator. If necessary, the Title VI Coordinator will assist the person in putting the complaint in writing and submit the written version of the complaint to the person for signature. The complaint shall then be handled in the usual manner.
4. Within 10 days, the CSPDC Title VI Coordinator will acknowledge receipt of the allegation in writing, inform the complainant of action taken or proposed action to process the allegation, advise the respondent of their rights under Title VI and related statutes, and advise the complainant of other avenues of redress available, such as DRPT, VDOT, FHWA, and FTA.
5. Within 10 days, a letter will be sent to the DRPT Public Information Officer, VDOT Central Office, Civil Rights Division, and a copy to the FTA and FHWA Virginia Division Office. This letter will list the names of the parties involved, the basis of the complaint, and the assigned investigator.
6. In the case of a complaint against the CSPDC, an FTA or DRPT investigator (as appropriate) will prepare a final investigative report and send it to the complainant, respondent, the CSPDC Title VI Coordinator, FTA, and FHWA Virginia Division.
7. Generally, the following information will be included in every notification to the DRPT Public Information Officer or VDOT Office of Civil Rights (as appropriate):
 - a. Name, address, and phone number of the complainant.
 - b. Name(s) and address(es) of alleged discriminating official(s).

- c. Basis of complaint (i.e., race, color, national origin, sex, age, handicap/disability, income status, limited English proficiency).
 - d. Date of alleged discriminatory act(s).
 - e. Date of complaint received by the recipient.
 - f. A statement of the complaint.
 - g. Other agencies (state, local, or federal) where the complaint has been filed.
 - h. An explanation of the actions the recipient has taken or proposed to resolve the issue raised in the complaint.
8. Within 60 days, the CSPDC Title VI Coordinator will conduct and complete an investigation of the allegation and based on the information obtained, will render a recommendation for action in a report of findings to the recipient of federal assistance. The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report of findings.
9. Within 90 days of receipt of the complaint, the CSPDC Title VI Coordinator will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights with the DRPT, VDOT, the FHWA, or FTA, if they are dissatisfied with the final decision rendered by the CSPDC. The CSPDC's Title VI Coordinator will also provide the DRPT Public Information Officer or VDOT Civil Rights Central Office (as appropriate) with a copy of the determination and report findings.
10. In the case of a nondiscrimination complaint that was originated at the CSPDC and is turned over to and investigated by DRPT, VDOT, FTA, FHWA, or another agency, the CSPDC Title VI Coordinator will monitor the investigation and notify the complainant of updates, in accordance with applicable regulations and DRPT/VDOT policies and procedures.
11. In accordance with federal law, the CSPDC will require that applicants of federal assistance notify the CSPDC of any lawsuits filed against the applicant or sub-recipients of federal assistance or alleging discrimination; and a statement as to whether the applicant has been found in noncompliance with any relevant civil rights requirements.
12. The CSPDC will submit Title VI accomplishment reports to DRPT and the VDOT Central Office, Civil Rights Division, in compliance with DRPT's and VDOT's established processes.
13. The CSPDC will collect demographic data on staff, committees, and program areas in accordance with 23 CFR, 49 CFR, DRPT's and VDOT's established procedures and guidelines.
14. Pursuant to the Virginia Public Records Act (VPRA) § 42.1-76 et seq., the CSPDC will retain Discrimination Complaint Forms and a log of all complaints filed with or investigated by the CSPDC.
15. Records of complaints and related data will be made available by request in accordance with the Virginia Freedom of Information Act (FOIA).

The CSPDC will investigate all complaints received. The CSPDC shall have sixty (60) days from receipt of the written complaint to investigate the complaint and respond to the complainant in writing with a determination. The complainant may appeal this determination to the Federal Transit Administration or the United States Department of Transportation within thirty (30) days of receipt of the determination. The CSPDC Title VI Complaint Form is included in Appendix 9.

FTA PROCESS

The letters of finding and resolution will offer the complainant and the recipient or sub-recipient the opportunity to provide additional information that would lead FTA to reconsider its conclusions. In general, FTA requests that the parties in the complaint provide this additional information within 60 days of the date the FTA letter of finding was transmitted. After reviewing this information, FTA's Office of Civil Rights will respond either by issuing a revised letter of resolution or finding to the party, or by informing the party that the original letter of resolution or finding remains in force. FTA strives to transmit these letters within 30 to 60 days of receiving the complaint.

FILING A COMPLAINT DIRECTLY TO THE U.S. DEPARTMENT OF TRANSPORTATION

A Title VI complaint may be filed with the U.S. Department of Transportation by contacting the Department at:

U.S. Department of Transportation
Federal Transit Administration's Office of Civil Rights
1200 New Jersey Avenue, SE
Washington, D.C. 20590

COMPLAINT DATABASE

Title VI Complaints will be archived in a complaint database and reviewed every 3 years to see if patterns are present or evolving and to ensure that issues are being resolved.

The Civil Rights Complaint Database includes:

- The name and address of the person(s) filing the complaint;
- Type of complaint: Title VI;
- Date of the complaint, investigation, or lawsuit;
- The basis of the complaint;
- Summary of the allegations;
- Actions taken by the CSPDC;
- Status of the complaint, investigation, or lawsuit.

The CSPDC has never had any Title VI investigations, lawsuits, or complaints. Additionally, CSPDC has not received any Title VI compliance reviews related to any federally funded projects within the past three years, nor has any Federal agency found CSPDC to be in noncompliance with any civil rights requirement(s).

APPENDIX 1: RESOLUTION



Central Shenandoah Planning District Commission

RESOLUTION

Central Shenandoah Planning District Commission Approving and Adopting the Title VI Plan

WHEREAS, Title VI of the Civil Rights Act of 1964 (U.S.C. 200D) provides that no person shall on the grounds of race, color, national origin, gender, or disabilities be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal Funds; and

WHEREAS, the Federal Transit Administration requires that any organization that is the recipient of Federal financial assistance shall have an adopted Title VI Plan and Policy; and

WHEREAS, the Central Shenandoah Planning District Commission is the direct recipient of Federal Transit Administration Formula Grants intended for the operation of public transit service in the Staunton-Augusta-Waynesboro Region.

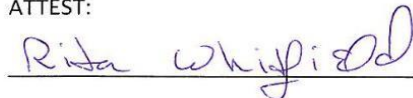
NOW THEREFORE, BE IT RESOLVED, that the Central Shenandoah Planning District Commission does hereby approve and adopt the Title VI Plan dated January 3, 2014.

Adopted by the CSPDC this 3rd day of February, 2014.

APPROVED:


Carolyn W. Dull
CSPDC Chairman

ATTEST:





RESOLUTION

Central Shenandoah Planning District Commission Approving and Adopting the Title VI Plan

WHEREAS, Title VI of the Civil Rights Act of 1964 (U.S.C. 200D) provides that no person shall on the grounds of race, color, national origin, gender, or disabilities be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal Funds; and

WHEREAS, the Federal Transit Administration requires that any organization that is the recipient of Federal financial assistance shall have an adopted Title VI Plan and Policy, and that Plan and Policy be update and adopted every three years; and

WHEREAS, the Central Shenandoah Planning District Commission is the direct recipient of Federal Transit Administration Formula Grants intended for the operation of public transit service in the Staunton-Augusta-Waynesboro Region.

NOW THEREFORE, BE IT RESOLVED, that the Central Shenandoah Planning District Commission does hereby approve and adopt the Title VI Plan dated January 3, 2014, and updated July 24, 2017.

Adopted by the CSPDC this 21st day of August 2017.

APPROVED:


Frank Friedman
CSPDC Chairman

ATTEST:





RESOLUTION

Central Shenandoah Planning District Commission Approving and Adopting the BRITE Transit Title VI Plan

WHEREAS, Title VI of the Civil Rights Act of 1964 (U.S.C. 2000) provides that no person shall on the grounds of race, color, national origin, gender, or disabilities be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal Funds; and

WHEREAS, the Federal Transit Administration requires that any organization that is the recipient of Federal financial assistance shall have an adopted Title VI Plan and Policy; and

WHEREAS, the Central Shenandoah Planning District Commission is the direct recipient of Federal Transit Administration Formula Grants intended for the operation of public transit service in the Staunton-Augusta-Waynesboro Region;

NOW THEREFORE, BE IT RESOLVED, that the Central Shenandoah Planning District Commission does hereby approve and adopt the Title VI Plan dated June 15, 2020.

Adopted by the CSPDC this 15th day of June 2020.

APPROVED:



Frank Friedman
CSPDC Chairman

ATTEST:



Annie S. Reed

APPENDIX 2: CSPDC COMMISSIONER MEMBERSHIP

CSPDC Commission members are appointed by their respective governing bodies. Each member jurisdiction is entitled to at least one representative on the Commission. Larger communities have several members based upon a board member allocation formula based on population.

Locality	Commissioner
Augusta County	Butch Wells* Board of Supervisors
Augusta County	Pam Carter Board of Supervisors
Augusta County	Veronica Moran Craigsville Town Council
Augusta County	Leslie Tate Non-Elected Representative
Bath County	Edward Hicklin Board of Supervisors
Buena Vista	Billy Fitzgerald City Council
Harrisonburg	Sal Romero City Council
Harrisonburg	George Hirschmann City Council
Harrisonburg	Adam Fletcher Non-Elected Representative
Highland County	David Blanchard Board of Supervisors
Lexington	Frank Friedman* City Council
Rockbridge County	Jay Lewis Board of Supervisors
Rockbridge County	Chris Slaydon Non-Elected Representative
Rockingham County	Brent Trumbo Board of Supervisors
Rockingham County	Steven Schofield Town Council
Rockingham County	Rhonda Cooper* Non-Elected Representative
Rockingham County	Kim Sandum Non-Elected Representative
Staunton	Carolyn Dull* City Council
Staunton	Sharon Angle Non-Elected Representative
Waynesboro	Terry Short* City Council
Waynesboro	Warren Johnson Non-Elected Representative

APPENDIX 3: BRITE TITLE VI INVESTIGATIONS, LAWSUITS & COMPLAINTS

BRITE Title VI Investigations, Lawsuits and Complaints									
Year of Report	2020								
		Basis of Complaint							
Investigations	Date BRITE notified	Race	Color	National Origin	Name of Complainant	Date of Occurrence	Location of Incident	Date of Closure	Notes and Results
1									
2									
Lawsuits									
1									
2									
Complaints									
1									
2									
2017	0								
2018	0								
2019	0								

APPENDIX 4: SAWMPO PUBLIC PARTICIPATION PLAN



PUBLIC PARTICIPATION PLAN (PPP)

Adopted: November 7, 2012

Amended: May 1, 2019



**Staunton Augusta
Waynesboro**
Metropolitan Planning
Organization

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Fax (540) 885-2687
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SAWMPO Public Participation Plan

Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO)

Policy Board

Officers

Chair, James Harrington, City of Staunton

Vice Chair, Wendell Coleman, Augusta County

Secretary/Treasurer, Bonnie S. Riedesel – Central Shenandoah Planning District Commission (non-voting)

Members

Tim Fitzgerald – Augusta County

Bobby Henderson, City of Waynesboro

Randy Kiser – Virginia Department of Transportation

Steven Rosenberg – City of Staunton

Jim Shaw – City of Waynesboro

Michele DeAngelis – Federal Transit Administration (non-voting)

Mack Frost – Federal Highway Administration (non-voting)

Rusty Harrington – Virginia Department of Aviation (non-voting)

Susan Newbrough – Virginia Regional Transit (non-voting)

Daniel Sonenklar – Virginia Department of Rail and Public Transportation (non-voting)

Technical Advisory Committee

Officers

Chair, Tom Sliwoski – City of Staunton

Vice Chair, Todd Wood – City of Waynesboro

Members

Luke Juday – City of Waynesboro

Don Komara – Virginia Department of Transportation

Rodney Rhodes – City of Staunton

Daniel Sonenklar – Virginia Department of Rail and Public Transportation

Leslie Tate – Augusta County

Doug Wolfe – Augusta County

Mack Frost – Federal Highway Administration (non-voting)

Michael Fulcher, Virginia Department of Transportation (non-voting)

Nancy Gourley – Central Shenandoah Planning District Commission (non-voting)

Susan Newbrough – Virginia Regional Transit (non-voting)

Terry Short, Virginia Department of Transportation (non-voting)

Phil Thompson – Virginia Regional Transit (non-voting)



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SAWMPO Public Participation Plan

Report Contact and Documentation

Contact Information

Citizens, stakeholders, and interested parties may contact the following for information regarding the PPP, the Title VI Plan, SAWMPO documents, and other public records. Submit oral and/or written comments about any advertised plan, and/or about the SAWMPO and its planning efforts to:

- SAWMPO Secretary/Treasurer
Central Shenandoah Planning District Commission (CSPDC)
112 MacTanly Place, Staunton, Virginia, 24401
Phone: (540) 885-5174
Fax: (540) 885-2687
Email: cspdc@cspdc.org
Website: www.sawmpo.org

Title VI Manager and Additional Assistance

Please submit any inquiries or comments for the SAWMPO Title VI Manager to CSPDC staff at the above contact information. Hearing and voice assistance are available from:

- Virginia Relay for Hearing and Voice Impaired: 7-1-1
- Outside Virginia: Voice 800-828-1140 | Hearing 800-828-1120

Title

Staunton-Augusta-Waynesboro Metropolitan Planning Organization Public Participation Plan

Authors

Ann Cundy, Transportation Program Manager
Zach Beard, Transportation Planner

Plan Date

2019

Granting/Sponsoring Agencies

Federal Highway Administration
Federal Transit Administration
Virginia Department of Transportation
Virginia Department of Rail and Public Transit
Local Funds



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SAWMPO Public Participation Plan

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Abstract

The Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO) Public Participation Plan (PPP) describes the SAWMPO's responsibilities, goals, and strategies for engaging the public in its transportation planning work. The original PPP adopted by the SAWMPO on November 7, 2012. The May ___, 2019 amendment ensures that the document is consistent with the SAWMPO's Title VI Plan and the federal fairness and equity requirements outlined in Federal Regulation Code 450.316 under the Federal Highway Administration. This and other SAWMPO documents are on repository at: Central Shenandoah Planning District Commission, 112 MacTanly Place, Staunton, Virginia, 24401.

Acknowledgements

This Plan was prepared on behalf of the SAWMPO through a cooperative process involving the City of Staunton, City of Waynesboro, County of Augusta, Virginia Department of Transportation, Virginia Department of Rail and Public Transportation, Federal Highway Administration, and the Federal Transit Administration. Administrative support and technical assistance was provided by the Central Shenandoah Planning District Commission (CSPDC).

The preparation of this Plan was financially aided through grants from the Federal Highway Administration, Federal Transit Administration, Virginia Department of Transportation, and the Virginia Department of Rail and Public Transportation.

Disclaimer

The SAWMPO ensures non-discrimination and equal employment in all programs and activities in accordance with Title VI and Title VII of the Civil Rights Act of 1964. If you have questions or concerns about your civil rights regarding this document, or if you need special assistance for persons with disabilities or limited English proficiency, please contact the SAWMPO. For more information, or to obtain a Title VI Complaint Form, see <http://sawmpo.org/public-participation-title-vi> or call (540) 885-5174.



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RESOLUTION



**Staunton Augusta
Waynesboro**
Metropolitan Planning
Organization

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RESOLUTION APPROVING THE STAUNTON-AUGUSTA-WAYNESBORO
METROPOLITAN PLANNING ORGANIZATION APPROVING THE PUBLIC
PARTICIPATION PLAN

WHEREAS, public involvement and participation is an essential part of the metropolitan transportation planning process; and

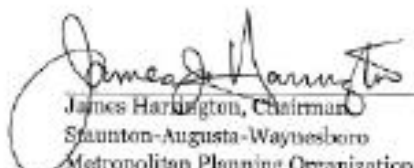
WHEREAS, Title VI and other Federal regulations require an ongoing public involvement process that documents outreach to disadvantaged, low income and minority communities and other stakeholders; and

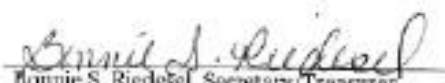
WHEREAS, this Public Participation Plan has been developed in consultation with representatives from agencies and officials responsible for other planning activities within the MPO that are affected by transportation, and stakeholders including but not limited to the traditionally underserved and disadvantaged and minority communities; generators and users of freight; representatives of users of public transportation, bikeways, greenways, etc.

NOW, THEREFORE, BE IT RESOLVED, that the Staunton-Augusta-Waynesboro Metropolitan Planning Organization Policy Board does hereby approve and adopt the amended Public Participation Plan on this, the 1st day of May 2019 and in so doing, repeals the Public Involvement Plan approved on November 2, 2012.

SIGNED:

ATTEST:


James Harrington, Chairman
Staunton-Augusta-Waynesboro
Metropolitan Planning Organization
Policy Board


Bonnie S. Riedesel, Secretary/Treasurer
Staunton-Augusta-Waynesboro
Metropolitan Planning Organization
Policy Board



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SAWMPO Public Participation Plan

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SAWMPO Public Participation Plan

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Section 1: Introduction

The Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO) was established as a result of the designation of the Staunton-Augusta-Waynesboro Urbanized Area (UZA) by the U.S. Census on March 26, 2012. Federal legislation requires that any urbanized area with a population greater than 50,000 have an MPO comprised of representatives of the local jurisdictions as well as state and federal transportation officials. The SAWMPO, comprised of a Policy Board and Technical Advisory Committee (TAC), has the responsibility for transportation policy-making in the urbanized area.

The Policy Board leads the SAWMPO transportation decision-making process in the SAWMPO region to ensure all possible solutions are examined and interests are addressed. The Policy Board is supported by SAWMPO staff, with guidance and technical assistance provided by the SAWMPO Technical Advisory Committee (TAC), which is comprised of staff from the SAWMPO's member jurisdictions, BRITE transit, and state and federal agencies. The SAWMPO ensures that current and future expenditures for transportation projects are based on a continuing, cooperative, and comprehensive (three-C) planning process that includes local priorities and mutually agreed upon goals informed by public input.

1.1 PPP Requirements

The Public Participation Plan (PPP) outlines the SAWMPO public participation process and reflects the public participation requirements contained in Federal Regulation Code 450.316. The PPP identifies the various methods and ways the SAWMPO works to ensure that the public is properly notified of its activities, and that opportunities to participate in the SAWMPO's short- and long-range planning activities are available to all residents.

Furthermore, this plan describes the standard legal procedures for the development, adoption, and amendment of the SAWMPO's three major MPO transportation planning documents: the Long Range Transportation Plan (LRTP), the Unified Planning and Work Program (UPWP), and the Transportation Improvement Program (TIP).

1.2 Relation to the SAWMPO Title VI Plan

Federal regulations require the PPP to be consistent with other federal, state, and regional transportation planning documents. This includes the SAWMPO Title VI Plan, which was developed to ensure SAWMPO follows Title VI and subsequent nondiscrimination regulations, specifically regarding Executive Order 12898 on Environmental Justice and Executive Order 13166 on Limited English Proficiency (LEP). The Title VI Plan contains environmental justice strategies for minority, low-income, and LEP populations that inform the public participation goals and outreach strategies in the PPP. Both the PPP and Title VI Plan contribute to the overall planning process of the SAWMPO's main plans (see Figure 1).

1.3 Periodic Review and Amendment of the PPP

The SAWMPO will review and consider revisions to its PPP on a bi-annual basis to ensure that it remains a dynamic and effective document. Review and amendment of the PPP will be done in consultation with various stakeholders as outlined in Section 2.



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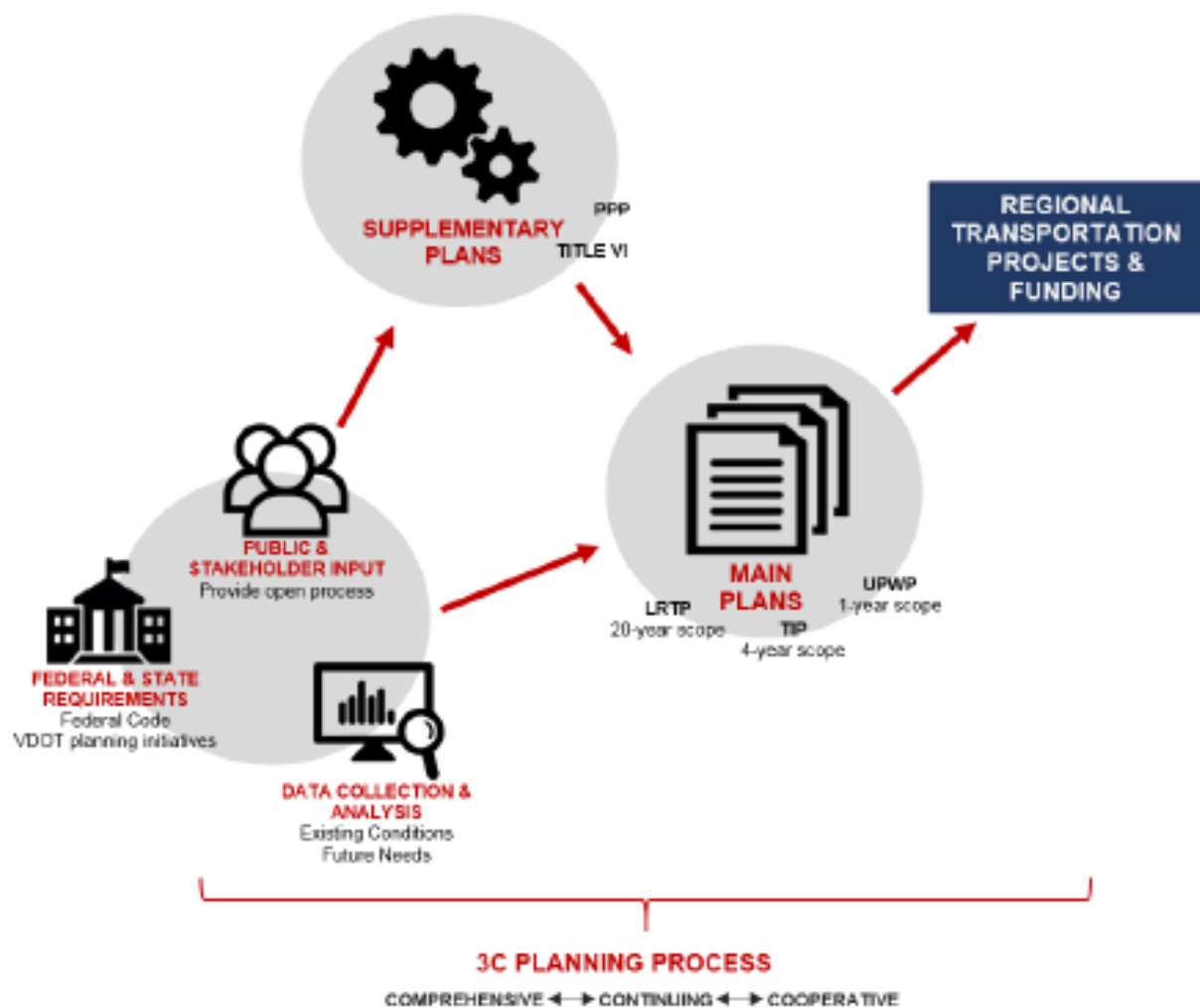
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Figure 1: Relationship of SAWMPO Documents



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SAWMPO Public Participation Plan

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Section 2: Purpose

The SAWMPO values and welcomes public participation in its transportation planning and programming efforts, initiatives, and decision-making processes. The purpose of the SAWMPO PPP is to provide a meaningful planning process that seeks a range of representation in public input from different points of view, different needs, and different backgrounds. Points of view that should be represented are demographics (including race, ethnicity, age, income, disability, LEP, gender, and sexual orientation), economic and environmental impact, education and health backgrounds, all modes of transportation, and geography.

2.1 SAWMPO will include the following stakeholders in the planning process:

- Citizens
- Affected public agencies
- Representatives of public transportation providers
- Freight shippers and providers of freight transportation services
- Private providers of transportation
- Representatives of users of public transportation
- Representatives of users of pedestrian walkways and bicycle transportation facilities
- Representatives of minority groups, including low-income, disabled, persons with mobility impairments, and LEP populations

Section 3: Goals, Desired Outcomes, and Measures

3.1 The goals of the SAWMPO relative to the public participation process are as follows:

- 3.1.1 Provide complete information on the SAWMPO activities to the public to ensure a full and open participation process; and
- 3.1.2 Provide adequate public notice for public review, input, participation, and comment on key decisions regarding the LRTP, TIP, UPWP, Title VI Plan, amendments to the PPP, and transportation planning initiatives and programs of significance; and
- 3.1.3 Utilize multiple means of public notice to ensure that transportation planning information reaches the broadest possible audience; and
- 3.1.4 Conduct meetings at convenient times and accessible locations; and



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- 3.1.5 Seek out and consider the needs of those traditionally underserved by existing transportation systems, such as low-income, minority, disabled, seniors, and LEP households who may face challenges accessing employment and other services; and
 - 3.1.6 Ensure that federal environmental justice and LEP requirements, and the equity initiatives outlined in SAWMPO Title VI Plan, are always followed
 - 3.1.7 Use visualization techniques where appropriate to help describe transportation plans and the TIP; and
 - 3.1.8 Demonstrate explicit consideration and thoughtful response to public input received during the development of the LRTP and the TIP and other planning initiatives; and
 - 3.1.9 Periodically review the effectiveness of this plan and its procedures and strategies to ensure a full and open participation process.
- 3.2 The desired outcomes of the SAWMPO relative the public participation process are as follows:
- 3.2.1 An engaged and well-informed citizenry and stakeholders that provides thoughtful and meaningful input and participation to the metropolitan planning process; and
 - 3.2.2 A meaningful and effective partnership between citizens, stakeholders, and the SAWMPO Policy Board and TAC; and
 - 3.2.3 An effective LRTP and other transportation related plans and programs that address the needs and interests of the community.
- 3.3 Performance measures to be used by SAWMPO in helping access its effectiveness in achieving its PPP goals and desired outcomes are as follows:
- 3.3.1 *Product and Service Results*
 - 3.3.1.1 Turnaround Time in Responding to Request for Information for Advertised Plans: SAWMPO staff will respond to a request for information regarding plans advertised for public comment within three (3) working days of receiving a request.
 - 3.3.1.2 Turnaround Time in Responding to Request for General Information: SAWMPO staff will respond to a request for information within five (5) working days after such request has been made.
 - 3.3.1.3 100% Percent Compliance Findings Resolved: Any compliance findings relative to the PPP will be resolved in a timely fashion.
 - 3.3.2 *Employee Training Results*
 - 3.3.2.1 Title VI Compliance Training: SAWMPO employees will attend Title VI Compliance training as it is available.



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SAWMPO Public Participation Plan

- 3.3.2.2 **Compliance Training:** SAWMPO employees will attend training on the current Federal Transportation Law and other regulatory compliance training as it is available.
- 3.3.3 **Organizational Effectiveness Results**
Key Plans Receive State and Federal Approval: All key transportation plans (LRTP, TIP, UPWP, and PPP) will receive the appropriate State and Federal approvals.
- 3.3.4 **Leadership Results**
 - 3.3.4.1 **Ethical Behavior.** The SAWMPO Policy Board, TAC, and Staff will perform their duties and responsibilities in a professional, ethical manner. The target is for zero ethical violations.
 - 3.3.4.2 **Regulatory Compliance.** SAWMPO will strive to achieve 100% compliance with Title VI and other regulations governing the SAWMPO.
 - 3.3.4.3 **Audit Findings.** The SAWMPO's target is to receive an unqualified audit opinion each year.
 - 3.3.4.4 **SAWMPO Policy Board and TAC Training.** Policy and TAC leadership will receive Title VI training as it is available.

Section 4: Public Meeting Location, Notice, and Procedures

The SAWMPO will take a proactive approach to providing an opportunity for the public and stakeholders to be involved in all phases of the transportation planning process and operate in a manner consistent with Title VI Regulations. This section outlines the procedures of all regular SAWMPO meetings and requirements for publication of legal notices. Section 5 provides an overview of public communication, education, and outreach initiatives.

4.1 Public Meeting Location and Guidelines

4.1.1 Location of Regular SAWMPO Policy Board and TAC Meetings

The location for regular SAWMPO Policy Board and TAC meetings will be held at: CSPDC, 112 MacTanly Place, Staunton, Virginia 24401. This facility is Americans with Disabilities Act (ADA) and public transit accessible.

4.1.2 Location of Public Information Meetings

Public information meetings will be held at various locations in the Staunton-Augusta-Waynesboro County area to inform the public of the planning process and to solicit ideas, input and feedback. Public hearings and public information meetings will be held at locations accessible to and at times convenient to minority and disabled residents. To the extent feasible, meeting locations held within the community will be ADA and public transportation accessible.



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4.1.3 Public Comment Opportunity

All regular and special meetings of the SAWMPO Policy Board and TAC, and any other SAWMPO appointed committee, will provide a public comment period after the meeting is called to order and the minutes of the prior meeting have been approved. This comment period may be used by citizens to address their concerns, provide input, etc. to matters on the agenda or of a general nature as long as they relate to metropolitan transportation planning. Additionally, when major plans as articulated in Section 4 are placed on the agenda, public comment time shall be provided as part of the Board's or TAC's discussion of that item. Public comment may also be received about an item or items to be discussed at a meeting via e-mail, mail, etc. prior to the meeting. In these cases, copies shall be provided to the Board and/or TAC members and noted for the public record during the meeting. Explicit attention to and consideration of public comments will be given and responses, when appropriate, provided to questions asked.

4.1.4 ADA Accessibility and Interpreter Availability

Every reasonable effort will be made to accommodate individuals with disabilities who wish to participate in the public process. Meeting facilities are ADA and public transit accessible. All public hearings will be held in facilities fully accessible to individuals with disabilities and mobility impairments. All written material will be available in accessible formats for the visually impaired (i.e. large print, Braille, and/or audio tapes), or personnel will be available for readings upon request.

Accessible formats for the visually impaired will be provided if needed and requested at least seven working days in advance of a regular and or/special scheduled meeting. Sign language for the hearing impaired and/or LEP interpreters will be provided if needed and requested at least seven working days in advance of a regular and/or special scheduled meeting. Requests for both visually impaired and language services should be made with the SAWMPO Staff identified in the contact section of this Plan.

4.2 Notice of Public Participation Activities

Public notice shall be provided for all public participation activities. Public participation activities include:

4.2.1 SAWMPO Policy Board meetings, both regular and special

4.2.2 TAC meetings, both regular and special

4.2.3 Any citizen advisory, ad-hoc or other formal committees that may be established by the Policy Board

4.2.4 Other meetings of the SAWMPO Policy Board and/or TAC that are designed to solicit community comment and information on metropolitan transportation planning efforts and/or plans

4.2.5 Any approval of the LRTP, TIP, UPWP, PPP, or any other major programs and/or plans; and

4.2.6 Any amendment to the LRTP, TIP, PPP; and

4.2.7 Any substantive amendment to the UPWP and any other major programs and/or plans.

4.3 Advisory Committees and Coordination with Federal, State, and Local Agencies

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4.3.1 *Technical Advisory Committee (TAC)*

The TAC is a permanent committee that is composed of technical, planning, and/or managerial staff representatives from each of the participating agencies of the SAWMPO. Subcommittees of the TAC may be utilized to study issue areas not requiring the full TAC participation.

4.3.2 *Other Advisory Committees*

Other Advisory Committees may be appointed by the SAWMPO Policy Board as it deems appropriate.

4.3.3 *The TAC and other SAWMPO appointed Committee(s)*

These committees will also solicit input and recommendations from other citizen groups and interested stakeholders when reviewing various transportation plans and programs.

4.3.4 *Coordination with Statewide Transportation Planning Process*

The Virginia Department of Transportation Staunton District Civil Rights Manager and District Planner will work with the Committee(s) to provide information and offer assistance on various issues. SAWMPO will actively coordinate and participate with the Commonwealth on the statewide transportation planning process as requested and as appropriate.

4.3.5 *Coordination with Federal, State, and Local Agencies*

SAWMPO will prepare its major transportation plans and programs in consultation with federal, state, and local agencies, including those responsible for land use regulation, natural resources, environmental protection, conservation, and historic preservation.

4.4 Public Notice Requirements for Meetings

4.4.1 *Regularly Scheduled Meetings*

Public notification for regularly scheduled SAWMPO Policy Board and/or TAC meetings shall be published after the last regular meeting of each year. The notification will include a meeting schedule providing the date, time, and location of meetings and shall be published once in both local newspapers and posted continuously on the SAWMPO website.

4.4.2 *Special Meetings or Rescheduled Meetings*

Public notification for special meetings or rescheduled regular meetings of the SAWMPO Policy Board and/or TAC advising the public of the date, time, and location of the special meeting or rescheduled regular meeting shall be published once in both local newspapers and posted to the SAWMPO website not less than seven calendar days prior to the meeting.

4.4.3 *Special Meetings for the Public*

Public notification for special meetings held within the community for the purpose of presenting plans, gathering public input, and participation shall be published once in local newspapers and posted to the SAWMPO website not less than fourteen calendar days prior to the meeting.

4.5 Public Notice Requirements for Approval and/or Amendment of Plans

4.5.1 *Approval of LRTP, TIP, UPWP, Title VI Plan, and Other Major Plans*



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Approval of the LRTP, TIP, UPWP, Title VI Plan, and other major plans shall be subject to public comment. A notice of such plan's consideration, solicitation of public comment, and an invitation to the meeting at which it will be considered for final adoption shall be published once in both local newspapers. Plans will be available for review for a period of not less than 21 calendar days.

4.5.2 Amendments to LRTP, TIP, Title VI Plan, and Other Major Plans

Amendments to the LRTP, TIP, Title VI Plan, and other major plans shall be subject to public comment. A notice of such plan's proposed amendment, a solicitation of public comment, and an invitation to the meeting at which it will be considered for final adoption shall be published once in both local newspapers. Plans will be available for review for a period of not less than 21 calendar days.

4.5.3 Amendments to UPWP

Substantive amendments to the UPWP that change the scope of work shall be subject to public comment. This includes adding or deleting work plans, but not programs de-programmed in order to be carried forward into the subsequent fiscal year. A notice of such plan's amendment, solicitation of public comment, and an invitation to the meeting at which it will be considered for final adoption shall be published once in both local newspapers. Plan amendments will be available for review for a period of not less than 21 calendar days.

4.5.4 Approval and Amendment to PPP

Approval of and/or amendments to the PPP shall be done in consultation with the various interested citizens and representatives of interested parties as identified in Section 4 and shall be subject to public comment. A notice of the PPP's proposed adoption and/or amendment, solicitation of public comment, and an invitation to the meeting at which it will be considered for final adoption shall be published once in local newspapers. The Plan will be available for review for a period of not less than 45 calendar days.

4.6 Approval of Major Plans

The Policy Board of the SAWMPO will hold the final public hearing and/or meetings, as appropriate and required, on the transportation plans as noted above. After due consideration of all public comments received in writing and/or presented in person at the meeting/hearing, the Policy Board will deliberate upon all information that it has received and make a decision, via Resolution, on the transportation plan in question. However, an additional period of public comment will be provided to stakeholders if the final LRTP differs significantly from the version that was made available for public comment and raises new material issues which interested parties could not reasonably have foreseen from the public involvement efforts.

4.7 Public Notice Requirements for Property Owners Impacted by Future SAWMPO Projects

All adjacent property owners, as well as those property owners within such project study corridors, potentially impacted by future SAWMPO projects shall be notified by direct mailing of the public notice and project location map of the public meeting a minimum of 30 days prior to the meeting. A direct post card mailing to the community/individuals affected by the project may be distributed.

4.8 Public Notice Methodology for Approval and/or Amendment of Plans & Special Meetings



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4.8.1 Newspapers

Public notice shall be published in the non-legal section of the newspaper. Yearly schedules of meetings will be published in major newspapers within the SAWMPO area, foreign language newspapers, and other media sources as deemed appropriate to reach minority populations. Such notice shall state the date, time, and location of the meetings and where information about the meeting or plan to be considered can be reviewed.

4.8.2 SAWMPO Website

All public notices shall be posted on the website under the "Events" tab. Such notice shall state the date, time, and location of the meetings and where information, plans, etc., about the meeting or plan to be considered can be reviewed. The information, in a digital format, shall be posted to the website and linked to the public notice.

4.8.3 E-Mail/Direct Mail Notification

A list of interested persons, stakeholders and/or organizations that have requested to receive notification of meetings, copies of agendas, notice when key plans and decisions are to be made shall be maintained by the SAWMPO staff. Notifications as required and articulated in Section 4 shall be sent to those on the notification list. Hard copies will not be sent if those on the list have e-mail.

4.8.4 Public Agencies

All interested and affected public agencies, State, Federal, regional and local, shall receive notification as required and articulated in Section 4. Hard copies will not be sent if these agencies have e-mail capability.

Section 5: Public Communication, Education, and Outreach

SAWMPO is committed to providing citizens, stakeholders and interested parties with access to its public records, plans, meetings, and activities. It is also committed to educating the public about metropolitan transportation planning and how it can affect their lives and businesses. The type of public communication and outreach for a project will be determined on the project's scale and significance. Localized projects may require more specialized outreach within the project area, while others may require extensive outreach efforts throughout the entire SAWMPO region, including traditionally underserved areas.

5.1 Access to Information

SAWMPO will provide the public with reasonable and timely access to technical and policy information relating to the data or content used in the development of transportation plans, programs and projects. Documents will be available for public inspection at the office of the SAWMPO staff (Central Shenandoah Planning District Commission) located at 112 MacTanly Place, Staunton, Virginia during normal working hours. To the extent feasible, documents will be digitized and made available on the SAWMPO website.



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Copies of draft plans and programs for public review will also be placed at the following locations:

- Central Shenandoah Planning District Commission, 112 MacTanly Place, Staunton, VA
- Augusta County Government Center, 18 Government Center Lane, Verona, VA
- Staunton City Hall, 116 W Beverley Street, Staunton, VA
- Waynesboro City Hall, 503 W Main Street, Waynesboro, VA

5.2 Response to Public Input

- 5.2.1 Responses to questions and comments from the public concerning the public participation process, draft transportation plans, programs, or public agency consultation process will be made directly to the individual by email, letter, telephone call, or some other appropriate means.
- 5.2.2 When significant written and oral comments are received on the draft LRTP, TIP, and UPWP as a result of the participation process outlined in the PPP or the interagency consultation process, a summary and analysis of the comments and a report on the disposition of the comments shall be made as part of the final LRTP and TIP.

5.3 Public Education and Outreach

5.3.1 SAWMPO Website

SAWMPO Staff will perform routine maintenance and updating and posting of materials on the SAWMPO website, to include but not be limited to: public notices for procurement, public comment, public meetings, policy documents of the SAWMPO, meeting schedules, SAWMPO events and activities calendar, major transportation plans including the LRTP, TIP, UPWP, PPP, etc., agendas and minutes of meetings for the Policy Board and TAC, etc.

5.3.2 Presentations

SAWMPO officials, staff and volunteers will make presentations as requested by citizen groups, public agencies, or local governmental bodies.

5.3.3 Public Meetings

SAWMPO officials, staff, and volunteers will attend public meetings sponsored by member jurisdictions as deemed necessary and appropriate by those jurisdictions and their staff.

5.3.4 Public Service Announcements

SAWMPO Staff will provide, as appropriate, public service announcements and interviews on radio and cable television local community channels to explain the subject matter and promote public participation.

5.3.5 News Articles and Press Releases

Articles and Press Releases will be provided to local media.

5.3.6 Open Houses, Roundtables, and Community Forums

SAWMPO Staff/Officials will provide information presentations at regional sites, open houses, round tables, or other community forums as requested and/or appropriate.



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5.3.7 *Direct Mailings*

Mailings will be provided to select individuals, groups, or organizations that have expressed interest or made comments at meetings when appropriate.

5.3.8 *Flyers*

Informational flyers will be distributed on public transit buses as appropriate.

5.4 Communication with Public and Community Organizations

5.4.1 The SAWMPO will coordinate with the statewide transportation planning public involvement and consultation process, as appropriate.

5.4.2 The SAWMPO will identify and communicate with populations traditionally underserved by the transportation network, such as those with disabilities, persons with mobility impairments, LEP, and low-income persons through organizations and media outlets known to serve these populations.

5.4.3 The SAWMPO has identified locations of underserved communities using Geographic Information Systems (GIS), and has included this mapping data in the Title VI Plan. The SAWMPO will also seek input from these communities throughout the planning phase, and specifically for the TIP and the LRTP updates.

Section 6: Transit and Public Participation

The Staunton-Augusta-Waynesboro BRTE public transit program chooses to integrate coordination with the SAWMPO and gives formal public notice in this PPP that the SAWMPO's TIP development process is being used to satisfy BRTE's public participation and public hearing requirements of Section 5307(c).

All public transportation providers in the region may utilize the SAWMPO as an entity to augment their public participation process. To that end, the SAWMPO will comply with transit planning requirements. Each public notice will state that "public notice of public involvement activities and time established for the public review and comments on the TIP will satisfy the Program of Projects requirements," as presented in joint Federal Highway Administration/Federal Transit Administration environmental regulations "Environmental Impact and Related Procedures" 23 C.F.R. Part 771. A project that requires an environmental assessment or an environmental impact statement will involve additional public involvement.



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APPENDIX 5: BRITE TRANSIT ADVISORY COMMITTEE MEMBERSHIP

The BTAC shall be composed of the following voting representatives, or their alternates, designated by and representing their respective jurisdictions or agencies, and shall be appointed by the CSPDC Commission:

1. One (1) member from each of the current transit funding partners:
 - a. City of Staunton
 - b. County of Augusta
 - c. City of Waynesboro
 - d. Augusta Health
 - e. Blue Ridge Community College
 - f. Shenandoah Valley Social Services
 - g. Wilson Workforce & Rehabilitation Center
 - h. Staunton Downtown Development Association
2. Two (2) members of the general public who utilize the transit system on a regular basis
3. One (1) non-voting member representing the staff of the Virginia Department of Rail and Public Transportation
4. One (1) non-voting member representing the contracted service provider
5. One (1) member representing any future funding partner(s)

Among the above individuals, the interests of the following demographic groups shall be represented: elderly persons, persons with disabilities, minorities, those with Limited English Proficiency, and people with low incomes.

Open positions on the BTAC are communicated to the public and the BRITE ridership through press release(s) in the local newspapers, posters on the buses, the BRITE website and BRITE social media. Title VI language is included in all communication.

Committee Member	Jurisdiction / Agency	Race
Steve Rosenberg	City of Staunton	White
Jennifer Whetzel	County of Augusta	White
Luke Juday	City of Waynesboro	White
Karen Clark	Augusta Health	White
Cynthia Page	Blue Ridge Community College	White
Terry Rodgers	Shenandoah Valley Social Services	White
Russell Neyman	Wilson Workforce & Rehabilitation Center	White
Greg Beam	Staunton Downtown Development Association	White
Paul Terry	General Public	White
Rebecca Messer	General Public / ADA-Transit Service Rider	White
Steven Hennessee	Department of Rail and Public Transportation	White
Steve Wilson	Contracted Service Provider / Virginia Regional Transit	White

APPENDIX 6: NOTICES OF TITLE VI PROVISIONS & AMERICANS WITH DISABILITIES ACT

Notices placed in all revenue service vehicles, on the BRITE website, in CSPDC offices, and at the transit facility.



Notice of Title VI Provisions

Central Shenandoah Planning District Commission (CSPDC) and Virginia Regional Transit (VRT) are committed to ensuring that no person is excluded from participation in, or denied the benefits of transit services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964.

For information on BRITE's Title VI obligations or to access Title VI complaint forms and procedures go to www.britebus.org, or contact Bonnie Riedesel, Executive Director, CSPDC, 112 MacTanly Place, Staunton, VA 24401 by mail, 540-885-5174 by phone, or bonnie@cspdc.org by email.

Spanish:

Central Shenandoah Planning District Commission (CSPDC) y Virginia Regional Transit (VRT) se compromete a garantizar que ninguna persona sea excluida de participar en, o ser negado de los beneficios de sus servicios de tránsito basado en raza, color, origen o nacionalidad, protegida por el Título VI de la Ley de Derechos Civiles de 1964.

Para obtener información sobre las obligaciones del Título VI de BRITE o para acceder a los formularios y procedimientos de queja del Título VI, visite www.britebus.org, o comuníquese con Bonnie Riedesel, Directora Ejecutiva, CSPDC, 112 MacTanly Place, Staunton, VA 24401 por correo, 540-885-5174 por teléfono o bonnie@cspdc.org por correo electrónico.

If you believe you have been subjected to discrimination under Title VI based on your race, color, national origin, or any aspect of this policy, you may file a complaint up to 180 days from the date of the alleged discrimination.

The complaint should include the following information:

- Your name, address, and how to contact you (i.e., telephone number, email address, etc.)
- How, when, where, and why you believe you were discriminated against.
- The location, names and contact information of any witnesses.

The complaint may be filed in writing to:

Virginia Regional Transit	or	Central Shenandoah Planning District Comm.
Attn: Title VI Manager		Attn: Title VI Coordinator
109 North Bailey Lane		112 MacTanly Place
Purcellville, Virginia 20132		Staunton, VA 24401

Spanish:

Si usted cree que ha sido objeto de discriminación bajo el Título VI sobre la base de su raza, color, origen nacional, o cualquier otro aspecto de esta política, puede presentar una queja, hasta 180 días a partir de la fecha de la supuesta discriminación.

La queja debe incluir la siguiente información:

- Su nombre, dirección, y cómo ponerse en contacto con usted (es decir, número de teléfono, dirección de correo electrónico, etc.)
- Cómo, cuándo, dónde y por qué cree que fue discriminado.
- La ubicación, nombres e información de contacto de cualquier testigo.

La queja puede ser presentada por escrito a:

Virginia Regional de Tránsito	or	Central Shenandoah Planning District Comm.
Atención: el Título VI Director		Attn: Title VI Coordinator
109 Norte Bailey Lane		112 MacTanly Place
Purcellville, Virginia 20132		Staunton, VA 24401

A Title VI complaint may be filed directly with the U.S. Department of Transportation by contacting the Department at:
U.S. Department of Transportation
Federal Transit Administration's Office of Civil Rights
1200 New Jersey Avenue, SE
Washington, D.C. 20590

NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 (ADA), BRITE and Virginia Regional Transit (VRT) will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

Employment: BRITE and VRT do not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

Effective Communication: BRITE and VRT will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in BRITE's and VRT's programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

Modifications to Policies and Procedures: BRITE and VRT will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in BRITE and VRT programs, services, or activities, should contact the ADA Coordinator, Bonnie Riedesel at 540-885-5174 or bonnie@cspdc.org, as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require BRITE and VRT to take any action that would fundamentally alter the nature of its programs or services, or impose any undue financial or administrative burden.

Complaints that BRITE and VRT programs, services, or activities are not accessible to persons with disabilities should be directed to the ADA Coordinator, Bonnie Riedesel at 540-885-5174 or bonnie@cspdc.org.

BRITE and VRT will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy.

BRITE's and VRT's ADA Grievance Procedure

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 (ADA). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by BRITE and VRT.

The Complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant, location, date, and description of the alleged discrimination. Alternative means of filing complaints, such as personal interviews or tape recording of the complaint, will be made available for persons with disabilities upon request.

The complaint should be submitted by the complainant and/or their designee as soon as possible but no later than 60 calendar days after the alleged violation by submitting the ADA complaint form located on the website (www.britebus.org) or to:

Bonnie Riedesel, ADA Coordinator
112 MacTanly Place
Staunton, VA 24401
540-885-5174
TTY/TDD (for the deaf or hard-of-hearing) 1-800-828-1120 or 711

Within 15 calendar days after receipt of the complaint the ADA Coordinator or their designee will meet with the complainant to discuss the complaint and the possible resolution. Within 15 calendar days of the meeting the ADA Coordinator or their designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille or audio tape. The response will explain BRITE's and VRT's position and offer options for substantive resolution of the complaint.

If BRITE's and VRT's responses do not satisfactorily resolve the issue, the complainant and/or their designee may appeal the decision within 15 calendar days after receipt of the response to the Virginia Department of Rail and Public Transportation.

All written complaints received by the ADA Coordinator or their designee, appeals to the Department of Rail and Public Transportation or their designee, and responses from these two offices will be retained by BRITE and VRT for at least three years.

APPENDIX 7: NOTICE TO THE PUBLIC

In order to comply with 49 CFR Section 21.9(d), the CSPDC shall provide information to the public regarding their Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI. The paragraph below will be inserted into all significant transit-related publications that are distributed to the public, such as local papers advertising transit-related transportation related public hearings or meetings, planning documents, and informational brochures. The text will be placed permanently on the CSPDC transit website in both English and Spanish (<http://www.cspdc.org>).

CSPDC hereby gives public notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964. CSPDC 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 protected by Title VI of the Civil Rights Act of 1964, as amended.

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

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 complaint with CSPDC. A signed written complaint must be submitted within 180 days of the alleged discriminatory act (or latest occurrence). Complaints will be accepted in writing at the following address:

Bonnie Riedesel, CSPDC Executive Director
112 MacTanly Place
Staunton, VA 24401
(540) 885-5174
bonnie@cspdc.org

Individuals may also file complaints directly with the U.S. Department of Transportation (USDOT), and/or the Federal Transit Administration (FTA) within the 180 day timeframe by contacting the Department at:

U.S. Department of Transportation
Federal Transit Administration's Office of Civil Rights
1200 New Jersey Avenue, SE
Washington, D.C. 20590

CSPDC por este medio da aviso público de su política para asegurar el pleno cumplimiento con el Title VI de la Civil Rights Act de 1964. CSPDC se compromete a garantizar que ninguna

persona sea excluida de participar en, o negado los beneficios de sus servicios por motivos de raza, color u origen nacional como protegida por el Title VI de la Civil Rights Act de 1964, según enmendada.

Ninguna persona o grupo de personas, deberá ser objeto de discriminación con respecto a las rutas, horarios, o la calidad del servicio de transporte proporcionado por CSPDC por motivos de raza, color u origen nacional. Frecuencia de servicio, la edad y la calidad de los vehículos asignados a las rutas, la calidad de las paradas que sirven diferentes rutas, y la ubicación de las rutas no pueden ser determinados por ningún motivo de raza, color u origen nacional.

Cualquier persona que cree que, de forma individual o como miembro de un grupo específico de personas, ha sido sometido a la discriminación por motivos de raza, color u origen nacional, puede presentar una queja con CSPDC. Una queja escrita y firmada debe ser presentada dentro de los 180 días del supuesto acto discriminatorio (o última ocurrencia). Las quejas serán aceptadas por escrito a la siguiente dirección:

Bonnie Riedesel, CSPDC Executive Director
112 MacTanly Place
Staunton, VA 24401
(540) 885-5174
bonnie@cspdc.org

Las personas también pueden presentar quejas directamente con el U.S. Department of Transportation (USDOT), y / o la Federal Transit Administration (FTA) en el plazo 180 días.

U.S. Department of Transportation
Federal Transit Administration's Office of Civil Rights
1200 New Jersey Avenue, SE
Washington, D.C. 20590

APPENDIX 8: NOTIFYING THE PUBLIC OF RIGHTS

The CSPDC includes the following statement in both English and Spanish on all transit-related printed information materials, on the agency's website, in press releases, in public notices, in published documents, and on posters on the interior of each vehicle operated in passenger service:

The CSPDC is committed to ensuring that no person is excluded from participation in, or denied the benefits of its BRITE transit services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964. For additional information on the CSPDC's nondiscrimination policies and procedures or to file a complaint, please visit the website at www.cspdc.org or contact the Title VI Administrator.

Central Shenandoah Planning District Commission (CSPDC) se compromete a garantizar que ninguna persona sea excluida de participar en, o ser negado de los beneficios de sus servicios de tránsito basado en raza, color, origen o nacionalidad, protegida por el Título VI de la Ley de Derechos Civiles de 1964. Para obtener información adicional sobre las políticas de no discriminación de CSPDC y los procedimientos o para presentar una queja, por favor visite el sitio web www.cspdc.org o póngase en contacto con el administrador del Título VI.

*Title VI Administrator/Administrador del Título VI:
Bonnie Riedesel, CSPDC Executive Director
112 MacTanly Place
Staunton, VA 24401
(540) 885-5174
bonnie@cspdc.org*

Instructions for filing Title VI complaints are posted on the agency's website and in posters on the interior of each vehicle operated in passenger service, and are also included within *other transit related CSPDC brochures*.

If you believe you have been subjected to discrimination under Title VI based on your race, color, national origin, or any aspect of this policy, you may file a complaint up to 180 days from the date of the alleged discrimination.

The complaint should include the following information:

- Your name, address, and how to contact you (i.e., telephone number, email address, etc.)*
- How, when, where, and why you believe you were discriminated against.*
- The location, names and contact information of any witnesses.*

The complaint may be filed in writing to:

*Bonnie Riedesel, CSPDC Executive Director
112 MacTanly Place
Staunton, VA 24401
(540) 885-5174
bonnie@cspdc.org*

A complaint may be filed with the U.S. Department of Transportation by contacting the Department at:

U.S. Department of Transportation
Federal Transit Administration's Office of Civil Rights
1200 New Jersey Avenue, SE
Washington, D.C. 20590

APPENDIX 9: TITLE VI COMPLAINT FORMS



112 MacTanly Place
Staunton, VA 24401

Phone: (540) 885-5174
Fax: (540) 885-2687

Title VI Discrimination Complaint Form

BRITE Bus Transit Services

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



112 MacTanly Place
Staunton, VA 24401

Phone: (540) 885-5174
Fax: (540) 885-2687

Section V
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?
<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, check all that apply:
<input type="checkbox"/> Federal Agency: _____
<input type="checkbox"/> Federal Court _____ <input type="checkbox"/> State Agency _____
<input type="checkbox"/> State Court _____ <input type="checkbox"/> Local Agency _____
Please provide information about a contact person at the agency/court where the complaint was filed.
Name:
Title:
Agency:
Address:
Telephone:
Section VI
Name of agency complaint is against:
Contact person:
Title:
Telephone number:

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

Signature and date required below:

Signature Date

Please submit this form in person at the address below, or mail this form to:

Bonnie S. Riedesel, Title VI Manager
112 MacTanly Place, Staunton, Virginia, 24401
Phone 540-885-5174; Email bonnie@cspdc.org



112 MacTanly Place
Staunton, VA 24401

Phone: (540) 885-5174
Fax: (540) 885-2687

Title VI Discrimination Complaint Form
BRITE Bus Transit Services

Sección I:				
Nombre:				
Dirección:				
Teléfono (Casa):			Teléfono (Trabajo):	
Dirección de Correo Electrónico:				
Requisitos formato accesible?	Letra Grande		Audio Tape	
	TDD		Otros	
Sección II:				
¿Está presentando esta queja en su propio nombre?			Si*	No
* Si su respuesta es "sí" a esta pregunta, vaya a la Sección III.				
Si no es así, sírvase proporcionar el nombre y la relación de la persona para quien se queja:				
Por favor, explique por qué usted ha presentado para un tercero:				
Por favor, confirma que ha obtenido el permiso de la parte perjudicada, si usted está presentando en nombre de un tercero.			Si	No
Sección III:				
Creo que la discriminación que experimenté fue basado en (marque todo lo que corresponda): [] Carrera [] Color [] Origen Nacional Fecha de la Discriminación Presunta (mes, día, año): _____ Explique lo más claramente posible lo que pasó y por qué cree que fue discriminado. Describir todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona (s) que lo discriminó (si se conoce), así como los nombres y la información de los testigos en contacto. Si se necesita más espacio, por favor use la parte de atrás de este formulario. _____ _____				
Sección IV				
¿Ha presentado previamente una queja del Título VI con esta agencia?			Si	No



112 MacTanly Place
Staunton, VA 24401

Phone: (540) 885-5174
Fax: (540) 885-2687

Sección V
¿Ha presentado esta queja con cualquier otro, estatal o agencia local Federal, o con cualquier corte federal o estatal?
<input type="checkbox"/> Si <input type="checkbox"/> No
En caso afirmativo, marque todo lo que corresponda:
<input type="checkbox"/> Agencia Federal _____
<input type="checkbox"/> Tribunal Federal _____ <input type="checkbox"/> Agencia Estatal _____
<input type="checkbox"/> Tribunal Estatal _____ <input type="checkbox"/> Agencia Local _____
Sírvanse proporcionar información sobre una persona de contacto en la agencia / tribunal donde se presentó la denuncia.
Nombre:
Título:
Agencia:
Dirección:
Teléfono:
Sección VI
Nombre de la agencia de queja es en contra:
Persona de contacto:
Título:
Número de teléfono:

Puede adjuntar cualquier material escrito o cualquier otra información que usted piensa que es relevante para su queja.

Firma y fecha requerida a continuación

Firma

Fecha

Por favor, envíe este formulario en persona en la dirección indicada más abajo, o envíe este formulario a:

Bonnie S. Riedesel, Título VI Oficial de Cumplimiento
112 MacTanly Place, Staunton, Virginia, 24401
Teléfono: 540-885-5174; Email: bonnie@cspdc.org