

# Title VI Report

## September 2016

**WTA**



Pursuant to Federal Transit Administration Circular 4702.1B



# Table of Contents

<b>Chapter 1: Whatcom Transportation Authority.....</b>	<b>3</b>
Study Area .....	3
Background .....	3
<b>Chapter 2: Title VI .....</b>	<b>4</b>
Purpose of the Title VI Report.....	4
Objectives .....	4
<b>Chapter 3: Outreach Activities &amp; Public Information Plan .....</b>	<b>5</b>
Overview .....	5
Ongoing Outreach Activities.....	5
Board & Committee Meetings.....	6
Public Hearings.....	6
Soliciting Feedback.....	7
Public Participation Plan.....	7
Key Principles .....	7
Goals.....	7
Objectives .....	8
Regional Partnerships/Capital Programming .....	9
Public Participation Process .....	9
LEP Threshold .....	9
General Outreach Efforts .....	10
Bi-Lingual Outreach Efforts .....	11
Minority Representation in the Decision Making Process.....	12
<b>Chapter 4: Four Factor Analysis &amp; Language Implementation Plan .....</b>	<b>13</b>
Overview .....	13
Four Factor Analysis .....	13-15
Language Implementation Plan .....	16
Ongoing Items .....	16

<b>Chapter 5: Tracking &amp; Investigating Complaints .....</b>	<b>17</b>
Overview .....	17
Procedures .....	17
Title VI Complaint Form .....	18-20
Spanish Title VI Complaint Form .....	21-23
<b>Chapter 6: Investigations, Lawsuits or Complaints.....</b>	<b>24</b>
Overview .....	24
List of Investigations, Lawsuits or Complaints .....	24
<b>Chapter 7: Notice to the Public .....</b>	<b>25</b>
Overview .....	25
Transit Guide.....	25
Website .....	25
<b>Chapter 8: Title VI List of recent Construction Projects (2014-2016) .....</b>	<b>26</b>
<b>Chapter 9: Vehicle Assignment .....</b>	<b>26</b>
<b>Chapter 10: Fixed Route Service Standards .....</b>	<b>27</b>
<b>Chapter 11: Transit Amenities by Census Tract.....</b>	<b>28</b>

# chapter 1:

## Whatcom Transportation Authority

---

### Study Area

Whatcom Transportation Authority (WTA) is located in Whatcom County, Washington. Whatcom County is situated in the extreme northwest corner of Washington State. The county is bounded on the north by Canada, to the east by the Cascade Mountain Range, on the south by Skagit County, and to the west by Bellingham Bay and the Strait of Georgia. The eastern two-thirds of the county is sparsely populated, mountainous terrain, most of which is in the Mt. Baker/Snoqualmie National Forest and North Cascades National Park. Interstate 5 bisects western Whatcom County and connects the area with Seattle to the south and Vancouver, British Columbia, to the north. A large portion of WTA service is oriented to students at Western Washington University, located in Bellingham.

### Background

In 1983, Whatcom County elected officials established a Public Transportation Benefit Area (PTBA) which included Bellingham. Voters in the expanded area of the PTBA approved a 0.3 percent sales tax to subsidize services. This amount was matched by the state Motor Vehicle Excise tax. WTA contracted with the City of Bellingham for fixed route transit service and started contracting with the Whatcom County Council on Aging for paratransit services.

- In 1992 paratransit services were brought in house.
- By 1995 virtually all remaining populated areas of the county had voted to join the PTBA.
- In 2002 voters approved an increase in the sales tax rate for WTA to 0.6 percent to offset lost Motor Vehicle Excise Taxes.
- In 2005, WTA introduced major changes to its service, including the introduction of high frequency corridors (Go Lines) and expanded service to a number of areas.
- In 2010, a 14% service cut was necessitated by reduced revenues due to the recession. Approximately half of that was restored less than a year later due to funding from the City of Bellingham.
- The 2015 population of the PTBA was 209,612 (Washington State Office of Financial Management).
- In 2015, WTA began a Strategic Planning process. We are reviewing our existing bus service, unmet needs for bus service, and how our communities are growing. We are also reaching out to underrepresented groups to gain their input. Within this process we will be adding additional service as our Board of Directors authorized a small increase per year.



# chapter 2:

## Title VI

---

### Purpose of the Title VI Report

Section 601 of Title VI of the Civil Rights Act of 1964 states the following:

*No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.*

This Title VI report of WTA is conducted in compliance with FTA Circular 4702.1B (10/1/12), to ensure that benefits and services provided by WTA are distributed consistent with the provisions of Title VI.

### Objectives

The following are the objectives of Title VI:

- a.** Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner;
- b.** Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin;
- c.** Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

The Title VI review of WTA requires several separate processes to occur. First is the submission of the compliance report completed by WTA. Second is the Federal Transit Administration's evaluation of WTA's compliance with the requirements of Title VI. Last is FTA's subsequent notification of findings, and the remedial actions which WTA may be required to undertake.

As a recipient of Federal transportation capital funding, WTA has prepared this report in compliance with requirements of Title VI.

# chapter 3:

## Outreach Activities & Public Participation Plan

---

### Overview

WTA works to ensure all populations are included in the agency's decision making process including minority, low-income and LEP populations. WTA solicits broad participation through a variety of means. Included in this chapter is a summary of public outreach and involvement activities, those that are ongoing and those that have been undertaken since the last submission of the Title VI Report.

#### Limited English Proficient (LEP)

*LEP refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.*

### Outreach Activities

WTA provides press releases about upcoming activities and meetings to the major media outlets serving the service area. The Bellingham Herald is designated as the official newspaper of WTA for the purpose of publication of legal notices and dissemination of public information announcements. WTA makes a special effort to contact publications that serve special populations that may be affected.

WTA keeps a list of interested and relevant persons and organizations, including those that serve minority, low income and LEP populations, and contacts them periodically regarding issues which may affect people that they serve. WTA provides information about meetings and service changes in rider alerts which are available on the buses, website, at the information booth at both transit stations and the administrative offices. WTA also creates posters to be displayed in buses, at transit centers, at bus stops and at locations relevant to the issue being presented.

WTA maintains a website, [www.ridewta.com](http://www.ridewta.com). The website includes information on services provided, board meetings, press releases, rider alerts, contact information, and the Title VI compliance notice and complaint procedures. The website also allows riders to submit comments pertaining to rider alerts as well as general complaints or suggestions.

WTA collects and tracks customer comments through a designated telephone number and email address.

WTA distributes rating cards to passengers to help determine customer satisfaction for WTA services and reviews the results annually.

In 2015, our consultant team from Nelson Nygaard and CBE Strategic, for our Strategic Plan, reached out to numerous underrepresented groups to gather input on bus information and bus routings.

## Board & Committee Meetings

WTA is governed by a ten-member Board of Directors. Board roles include providing oversight, setting policies, developing strategies, reviewing agency performance, monitoring the budget, establishing resolutions, and evaluating the General Manager. Within the Board of Directors there is an Executive Committee which reviews and makes recommendations on the Board meeting agenda items pursuant to full Board consideration. Both a Board and a Committee meeting are scheduled every month and are open to the public except to the extent that executive sessions are authorized by law. At each meeting a portion of agenda is allotted for citizen communication.

## Public Hearings

At public hearings WTA provides opportunity for interested persons or agencies to give comments. Any interested persons may submit orally, or in writing, comments with respect to the issue being presented. If persons are not able to attend the public hearing they may submit comments via mail, comment phone line or email. WTA also provides special assistance or materials in an accessible format. Meeting locations are generally served by transit routes and WTA offers rides if transit service is not available.

According to WTA Bylaws public hearings shall be held by the WTA board in regard to the following:

**a.** When there is a proposed change in transit fares to include any fare charge increase or decrease outside of policy interpretation to ensure equity or clarification of fares in light of board intent.

**b.** When there is a substantial change in service. Proposed modification of transportation service that require a public hearing include:

- A change in span of service or more than ten minutes of the published start and end times;
- A change in frequency of service, either an increase or decrease;
- A change that results in a decrease of service coverage (change in service coverage for fixed routes shall be based on whether the change is within the  $\frac{1}{4}$  mile corridor for walking or whether the change will significantly impact customers);
- A change in the days of service;
- When a new transit route is established.

**c.** Presentation of the annual budget of WTA or substantial changes thereto, including modifications involving funding under the Federal Transit Administration Act.

**d.** Establishment of civil or criminal penalties related to the operation of WTA.

WTA Bylaws also require that notice of changes in the time or place or regular meetings or the call for a special meeting will be provided to each local newspaper of general circulation and to each local radio or television station which has on file with WTA a written request to be so notified. Such a notice or call shall be given at least 24 hours in advance and shall specify the time and place of the meeting and the business to be transacted, provided that notice shall be given at least ten days in advance of public hearings.



## Soliciting Feedback

WTA solicits feedback from the public by means of public hearings, comment cards on buses, a telephone comment line, a website comment line, and with periodic community surveys. In addition whenever a potential change in policy or service which might affect known social and health service providers they are contacted directly and encouraged to comment. We have also been soliciting feedback through our Strategic Planning process. We have two committees which are made up of community members and other planning organizations. We also have a strategic plan website which has included two surveys asking for public feedback. The first survey was how to build our system, “Play the Planning Game” and the second survey was looking at each individual route and the proposed changes to the schedule and routing.

## Public Participation Plan

### Key Principles

WTA’s Public Participation Plan (PPP) has been prepared to ensure that no one is precluded from participating in WTA’s service planning and development process. It ensures that:

- Potentially affected community members will have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health;
- The public’s suggestions can and will influence WTA’s decision making;

- The concerns of all participants involved will be considered in the decision-making process; and;
- WTA will seek out and facilitate the involvement of those potentially affected.

## Goals

- **Clarity in Potential for Influence** – The process clearly identifies and communicates where and how participants can have influence and direct impact on decision making.
- **Consistent Commitment** – WTA communicates regularly, develops trust with riders and our community and builds community capacity to provide public input.
- **Diversity** – Participants represent a range of socioeconomic, ethnic and cultural perspectives, which include residents from low income neighborhoods, ethnic communities and residents from Limited English Proficiency.
- **Accessibility** – Every reasonable effort is made to ensure that opportunities to participate are physically, geographically, temporally, linguistically, and culturally accessible.
- **Relevance** – Issues are framed in such a way that the significance and potential effect is understood by participants.
- **Partnerships** – WTA develops and maintains partnerships with stakeholder communities.

# Objectives

- **Inclusiveness** – WTA will proactively reach out to and engage low income, minority and LEP populations in the WTA service area.
- **Respect** – All feedback will be given careful and respectful consideration.
- **Proactive and Timeliness** – Participation methods will allow for early involvement and be ongoing.
- **Clear, Focused and Understandable** – Participation methods will have a clear purpose and use for the input, and will be described in language that is easy to understand.
- **Honest and Transparent** – Information provided will be accurate, trustworthy and complete.
- **Responsiveness** – WTA will respond and incorporate appropriate public comments into transportation decisions.
- **Accessibility** – Meetings will be held in locations which are fully accessible and welcoming to all area residents and in locations relevant to the topics being presented and discussed.

WTA will use its public participation plan when considering fare changes, significant modifications to routes and schedules and other transit planning projects when:

- A fare increase or significant change in the method of fare payment is being considered;
- A new route is established;
- An existing route is proposed for elimination;
- Considering the total discontinuance of service on any route or group of routes on any given day when service is currently offered;
- Any system-wide change in service hours that exceeds (plus or minus) 10% of current total service hours;
- Routing on any given route or group of routes that affects more than 25% of the riders using the affected route(s); or
- Schedules are changed on any given route or group of routes that reduces the total number of one-way bus trips by more than 25% of the current number of bus trips.
- For minor schedule and service changes not rising to the level of those above, WTA will post service change notices on appropriate buses and stops fifteen days in advance of the change date.

# Regional Partnership/Capital Programming

For its capital programming, including major facility and bus procurements, WTA uses the Whatcom County Council of Governments adopted public participation plan, dated October 14, 2009. This plan clearly indicates that the MPO’s public participation process satisfies the WTA’s public participation requirements for its Program of Projects. The notices for the regional Transportation Improvement Program (TIP) also state that the notice of public involvement activities and time established for public review of and comments on the TIP will satisfy FTA’s program of projects requirement.

## Public Participation Process

### LEP Threshold

We are using the 2010 census data which showed that Spanish was the only language meeting the LEP minimum of 1,000 speakers or 5% of the population, whichever is lowest. In reviewing the most current American Community Survey, though less detailed than the 2010 census, it did not suggest that any language other than Spanish has reached the 1,000 speakers threshold. As a result of the 2010 census WTA now translates all of its primary public information materials in Spanish.

### Whatcom County Residents who Speak English less than “very well”

2010 Census

Language	# of people	% of County Total
Spanish or Spanish Creole	4,043	2.2%
Russian	657	0.3%
Other Indic languages	427	0.2%
Other Slavic languages	372	0.2%
Vietnamese	362	0.2%
Chinese	357	0.2%
Tagalog	334	0.2%
Korean	307	0.2%
German	278	0.1%

## General Outreach Efforts

(Alerting Riders and Encouraging Engagement)

The results of the new numerical threshold for what constitutes a significant LEP population has caused WTA to modify its' process for reviewing service and/or fare changes. This has prompted WTA to expand its Public Participation Plan to include new outreach efforts.

While there may be minor variation in the outreach process from time-to-time, the outline below provides the general steps for engaging riders in the decision making process using a service change as an example.

1. A service change proposal is developed internally or as a result of public comment;
2. An internal review by the appropriate committees is conducted (for example WTA's Service Review Committee will review all service change proposals);
3. The proposal, if significant, is reviewed by WTA's Citizen Advisory Committee (CAP);
4. A Title VI review of the proposal is conducted to see whether minority or LEP persons might be disproportionately affected;
5. Authorization from the WTA Board of Directors is sought to proceed to a public comment period to be followed by a public hearing;
6. Public outreach avenues, dates and times are determined with consideration of the proposed changes and their impact on specific locations/ populations within the WTA service area;
7. Bilingual (English and Spanish) public outreach materials are developed and distributed by mail, e-mail and online;
8. The public comment period ends;
9. WTA's Service Review Committee reviews comments received and decides whether to modify the service change recommendation as a result;
10. The WTA Board of Directors reviews the outcome of the public participation process along with staff recommendations;
11. If approved then planning for the implementation of the service change begins;
12. Outreach is conducted in advance of the service change via bilingual onboard rider alerts, transit station reader boards and on the website;

## Strategic Plan Outreach to Underrepresented Groups

As part of WTA's 2016 Strategic Plan, a firm was hired with expertise in reaching out to historically underrepresented groups. Many of these groups speak a language other than English. Contact was made with groups speaking Spanish, Russian, Punjabi, as well as the Lummi Tribe, Ethnic Student Union at Western Washington University and the Northwest Chinese Cultural Association. WTA plans to maintain relationships with many of these groups after the Strategic Plan is completed.

## Bi-Lingual Outreach Efforts (Spanish and English)

- Web-Based Comment Line;
- On-Board Rider Alerts to provide riders with details of service changes and schedules of public meetings and hearing;
- Transit Station reader board messages;
- Direct Mail to groups or agencies representing citizens with limited English capabilities.
- In 2015, WTA finalized the upgraded version of our website, [www.ridewta.com](http://www.ridewta.com) and added a Spanish website, [www.ridewta.com/espanol](http://www.ridewta.com/espanol). It is now a responsive website making it more accessible to people with smart phones.
- WTA also provides Spanish language versions of:
  - ◆ our primary printed public information piece, the Transit Guide
  - ◆ Paratransit Riders Guide
  - ◆ Paratransit application form
  - ◆ Paratransit Eligibility Determination letters
  - ◆ Title VI non-discrimination notices (to be posted in public places)
  - ◆ Title VI complaint form (available at transit stations, the administrative building and on the website)
- For WTA's Strategic Plan Community Meetings in 2016, we will translate materials into Russian and Punjabi. We will continue to monitor the growth and need of materials translated to these languages.



# Minority Representation in the Decision Making Process

*Minority Representation on Non-elected Planning Boards, Advisory Councils, Committees:*

WTA's **Citizen's Advisory Panel** is a subset of a different advisory group (Citizens Transportation Advisory Group 'CTAG') formed by the Whatcom Council of Governments (WCOG), the local MPO. The WCOG has made outreach to specific agencies that work with low income and minority people looking for participation on CTAG without success.

The **Service Review Committee** (SRC) is an internal staff planning group responsible for giving direction on routes, schedules and service related policies. No particular effort is made to insure diversity on this committee. Rather, the diversity of the agency is naturally reflected in its membership

## Citizens Advisory Panel (CAP)

Race	Number of People	% of CAP	% in Community
White	17	100%	85%
Native American	0	0%	3%
African American	0	0%	1%
Asian	0	0%	4%
Other	0	0%	7%

## Service Review Committee (SRC)

Race	Number of People	% of SRC	% in Community
White	10	83%	85%
Native American	1	8%	3%
African American	0	0%	1%
Asian	1	8%	4%
Other	0	0%	7%

# chapter 4:

## Four Factor Analysis & Language Implementation Plan

---

### Overview

The purpose of WTA's Four Factor Analysis is to determine if Whatcom County has a significant population of Limited English Proficiency (LEP) residents. It includes LEP threshold data from the 2010 census. The Language Implementation Plan describes how WTA will ensure meaningful access to benefits, services, information, and other important portions of programs and activities for LEP individuals.

### Four Factor Analysis

#### 1. Number or proportion of LEP persons eligible or likely to be encountered by a program.

WTA conducted a survey of all staff members in June 2016. Those who have significant interaction with the general public were the ones who tended to respond, including Customer Service Representatives, Operators, and Bus station Expeditors. We received 25 responses.

#### Survey

*What languages (other than English) do you encounter? How often do you encounter them?*

Language Encountered	Number of Respondents	How often Encountered
Spanish	22	Daily = 36%, Weekly = 55%, Monthly = 5%, Few times/year = 5%
Russian	13	Daily = 15%, Weekly = 46%, Monthly = 23%, Few times/year = 15%
Punjabi	17	Daily = 24%, Weekly = 59%, Monthly = 12%, Few times/year = 6%
Chinese	9	Daily = 33%, Weekly = 33%, Monthly = 11%, Few times/year = 22%
Vietnamese	10	Daily = 20%, Weekly = 50%, Monthly = 20%, Few times/year = 10%
Korean	5	Weekly = 60%, Monthly = 40%
Japanese	10	Daily = 40%, Weekly = 40%, Monthly = 10%, Few times/year = 10%
Other (Sign/ASL, Tagalog, Ukrainian)	7	Mostly Weekly

*Do you feel language barriers prevent riders from using WTA services?*

- Yes, frequently 8%
- Yes, sometimes 56%
- Yes, rarely 8%
- No 28%

*Are there any tools WTA could provide that would assist you in offering better service to riders who don't speak English?*

- Sheets in other languages on how to schedule rides
- Teach Sign Language and Spanish among other languages
- Translators at the stations
- Software to help identify a caller's language to better help
- Talk to text application which translates the words

## Questionnaire

In 2013, WTA sent out a questionnaire to twenty local organizations that serve LEP people, asking what their transportation needs were and how well WTA was meeting those needs. As a result to the generally positive feedback and efforts that we have made, we did not feel the need to conduct this survey again.

## **2. The frequency with which LEP persons come into contact with the program**

Though the number of LEP persons who have trouble riding WTA is not high, there is daily interaction between WTA staff and members of the Spanish, Russian, Punjabi, and Japanese speaking communities who do not speak English well. Less frequent interaction is had with Chinese, Vietnamese, and Korean speaking persons.

Through our survey and talking with front line employees the biggest problem we see is when the bus rider knows virtually no English. We have been outreaching to numerous LEP persons through our strategic planning process to help them become comfortable with the bus system.

## **3. The nature and importance of programs provided by WTA to LEP persons**

WTA's most critical services are, naturally, the service on the street (both fixed route and paratransit). In order to use WTA's services people must have access to the fixed route routes and schedules and to paratransit eligibility and application procedures.

Most of WTA's bus routes are timed with a 5-10 minute window for transfers. If an LEP person is unable to understand what bus they need, and help from a staff member takes inordinately long or is not adequate, then missing the transfer is highly likely. This could cause an individual to be late for any number of important activities (work, school, meetings, etc.) which in turn could hurt their ability to successfully integrate into society.

For paratransit, where policies and procedures are more complicated than fixed route, the need for adequate access to information is equally important. Delays in the provision of LEP service can affect access to medical services, which can be of critical importance.

Through our community outreach efforts we have found that there is not a significant problem in the availability of WTA information for LEP persons. In the future we feel we may need to print rider alerts, transit guides, and other information in Russian and Punjabi as those are the next most common languages found in Whatcom County.

## **4. The resources available and cost to your organization**

The following is a list of existing LEP resources, and those in the process of being implemented by WTA.

# Language Implementation Plan

## Ongoing Items

- Train frontline and other key staff on:
  - ◆ Awareness of type of language services available
  - ◆ How staff and/or LEP customers can obtain these services
  - ◆ How to respond to LEP callers, in person, and correspondence from LEPs
  - ◆ How to document LEP needs
- Title VI information is posted in all locations. Cordata Station, Downtown Station, Maintenance and Operations Base, paratransit and fixed route buses.
- Continue to have Spanish and English Complaint forms available on our website
- Continue to print the Transit Guide in Spanish and English
- Continue to provide telephone interpretation for basic transit questions and trip planning assistance using Language Line Services.
- Continue to provide access to a public videophone at WTA's Bellingham Station. The videophone service provides free interpretation between a non-signing and a signing deaf person.
- Identify routes serving areas with high concentrations of LEP individuals using the outreach feedback we have received
- Continue to provide education, training, and tools for social service providers.
- Continue to provide diversity awareness training to employees.
- Continue partnerships and work closely with community organizations that serve LEP populations.
- Ensure that "Language Flag Identifiers" are available for Transit Station Expeditors, Customer Service Representatives and Supervisors.
- Provide use of in-person interpreter services, as determined by WTA, for public meetings and important events.
- Continue to track and record use of language services.
- Routinely assess whether existing language services are meeting the needs of LEP customers.
- Seek feedback from LEP organizations and customers on WTA's Language Implementation Plan.
- Maintain list of WTA bilingual staff.
- Provide copies of the most commonly asked transit questions in Spanish, Russian and Punjabi for Customer Service Representatives and Station Expeditors.
- Routinely inform the entire WTA employee group of both existing and new LEP services at all-employee meetings.
- Put language line link, as well as deaf and hard of hearing services on WTA's website.
- Create signage in multiple languages informing LEP clients about the telephone language line and post in key locations.
- Maintain Spanish language website.



# chapter 5:

## Tracking & Investigating Complaints

---

### Overview

In order to comply with 49 CFR Section 21.9(b) WTA needs to have procedures for investigating and tracking Title VI complaints filed against them and have the procedures for filing a complaint available to members of the public.

### Procedures

WTA Policy # 405-13 Complaint and Grievance Procedure under Title VI of the Civil Rights Act of 1964 outlines WTA's procedure for tracking and investigating Title VI complaints.

### Title VI Complaint Procedures

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

Once the complaint is received, WTA will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

WTA has 30 days to investigate the complaint. If more information is needed to resolve the case, WTA may contact the complainant.

The complainant has 15 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 15 business days, WTA can administratively close the case. A case can be administratively closed also if the complainant no longer wished to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wished to appeal the decision, she/he has 30 days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with Federal Transit Administration, at

FTA Office of Civil Rights  
1200 New Jersey Avenue SE  
Washington, DC 20590

If information is needed in another language, please contact (360) 738-4584.

# TITLE VI COMPLAINT FORM



## SECTION A

NAME \_\_\_\_\_

ADDRESS \_\_\_\_\_

TELEPHONE (Home) \_\_\_\_\_ TELEPHONE (Work) \_\_\_\_\_

E-MAIL \_\_\_\_\_

ACCESSIBLE  
FORMAT  
REQUIREMENTS

☐ LARGE PRINT ☐ AUDIO TAPE

☐ TDD ☐ OTHER \_\_\_\_\_

## SECTION B

1. ARE YOU FILING THIS COMPLAINT ON YOUR OWN BEHALF?
- ☐ YES ☐ NO IF YES, SKIP TO SECTION C
2. WHAT IS THE NAME AND RELATIONSHIP OF THE PERSON FOR WHOM YOU ARE COMPLAINING? \_\_\_\_\_
3. PLEASE EXPLAIN WHY YOU HAVE FILED FOR A THIRD PARTY:
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
4. HAVE YOU OBTAINED THE PERMISSION OF THE AGGRIEVED PARTY FOR WHO YOU ARE FILING THIS COMPLAINT? ☐ YES ☐ NO

## SECTION C

I BELIEVE THE DISCRIMINATION I EXPERIENCED WAS BASED ON (check all that apply):

- ☐ RACE ☐ NATIONAL ORIGIN
- ☐ COLOR ☐ OTHER \_\_\_\_\_

## SECTION D

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 E

HAVE YOU PREVIOUSLY FILED A TITLE VI COMPLAINT WITH WTA?

☐ YES☐ NO

## SECTION F

HAVE YOU FILED THIS COMPLAINT WITH ANY OTHER FEDERAL, STATE OR LOCAL AGENCY, OR WITH ANY FEDERAL OR STATE COURT?

☐ YES☐ NO

IF YES, CHECK ALL THAT APPLY:

☐ FEDERAL AGENCY

☐ STATE AGENCY☐ LOCAL AGENCY

 FEDERAL COURT

☐ STATE COURT

**SECTION G**

PLEASE PROVIDE INFORMATION ABOUT A CONTACT PERSON AT THE AGENCY/COURT WHERE THE COMPLAINT WAS FILED:

CONTACT NAME \_\_\_\_\_

TITLE \_\_\_\_\_

NAME OF AGENCY \_\_\_\_\_

ADDRESS \_\_\_\_\_

TELEPHONE \_\_\_\_\_

**SECTION H**

PLEASE PROVIDE INFORMATION ABOUT THE AGENCY THE COMPLAINT IS AGAINST:

CONTACT NAME \_\_\_\_\_

TITLE \_\_\_\_\_

NAME OF AGENCY \_\_\_\_\_

ADDRESS \_\_\_\_\_

TELEPHONE \_\_\_\_\_

**SECTION I**

YOU MAY ATTACH ANY WRITTEN MATERIALS OR OTHER INFORMATION THAT YOU THINK IS RELEVANT TO YOUR COMPLAINT.

SIGNATURE AND DATE REQUIRED BELOW

\_\_\_\_\_  
SIGNATURE

\_\_\_\_\_  
DATE

**SECTION J**

PLEASE SUBMIT THIS FORM IN PERSON AT THE ADDRESS BELOW, OR MAIL THIS FORM TO:

TITLE VI COORDINATOR  
WHATCOM TRANSPORTATION AUTHORITY (WTA)  
4111 BAKERVIEW SPUR RD  
BELLINGHAM, WA 98226

## SECCIÓN A

Nombre \_\_\_\_\_

Dirección \_\_\_\_\_

Teléfono (casa) \_\_\_\_\_ Teléfono (trabajo) \_\_\_\_\_

Correo electrónico \_\_\_\_\_

Requisitos del formato accesible ☐ Caracteres grandes ☐ Grabación

☐ TDD ☐ Otro \_\_\_\_\_

## SECCIÓN B

1. ¿Presenta esta queja a nombre propio?  
☐ Sí ☐ No Si afirmativo, salte a la sección C.
2. ¿Cómo se llama y qué parentesco tiene con la persona a nombre de la cual pone la queja? \_\_\_\_\_
3. Explique por qué llena esto para otra persona: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
4. ¿Tiene permiso de la parte perjudicada para quien presenta esta queja? ☐ Sí ☐ No

## SECCIÓN C

Considero que la discriminación que sufrí se basó en (marque todas las que correspondan):

- ☐ Raza ☐ Nacionalidad
- ☐ Color ☐ Otro \_\_\_\_\_



## SECCIÓN D

Fecha de la presunta discriminación (mes, día, año) \_\_\_\_\_

Explique lo más claro posible qué pasó y por qué cree que se le discriminó. Describa a todas las personas que estuvieron implicadas. Incluya el nombre y los datos de contacto de la(s) persona(s) que lo discriminaron (si lo sabe) al igual que los nombres y datos de contacto de cualquier testigo. Si necesita más espacio, use la parte trasera del formulario.

This image shows a blank sheet of white paper with horizontal blue ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

## SECCIÓN E

¿Ya había presentado un título vi de queja con la wta? ☐ Sí ☐ No

## SECCIÓN **F**

¿Presentó esta queja en otra agencia local, estatal o federal, o en algún tribunal estatal o federal?

☐ Sí      ☐ No      Si afirmativo, marque todas las que correspondan:

☐ Agencia Federal      ☐ Agencia Estatal      ☐ Agencia Local

☐ Tribunal Federal ☐ Tribunal Estatal

**SECCIÓN G**

Indique la información de la persona de contacto en la agencia/tribunal donde se presentó la queja:

Nombre de contacto \_\_\_\_\_

Título \_\_\_\_\_

Nombre de la agencia \_\_\_\_\_

Dirección \_\_\_\_\_

Teléfono \_\_\_\_\_

**SECCIÓN H**

Indique la información de la agencia contra la que se presenta la queja:

Nombre de contacto \_\_\_\_\_

Título \_\_\_\_\_

Nombre de la agencia \_\_\_\_\_

Dirección \_\_\_\_\_

Teléfono \_\_\_\_\_

**SECCIÓN I**

Debe adjuntar cualquier material escrito o cualquier información que considere relevante para su queja.

Se requiere abajo la firma y fecha

\_\_\_\_\_  
Firma

\_\_\_\_\_  
Fecha

**SECCIÓN J**

Presente este formulario en persona en la siguiente dirección o envíelo por correo a:

Title VI Coordinator  
Whatcom Transportation Authority (WTA)  
4111 Bakerview Spur Rd  
Bellingham, WA 98226

# chapter 6:

## Investigations, Lawsuits, or Complaints

---

### Overview

In order to comply with 49 CFR Section 21.9 (b), WTA shall prepare and maintain a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming WTA that allege discrimination on the basis of race, color, or national origin. The list shall include the date of the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by WTA in response to the investigation, lawsuit, or complaint

### List of Investigations, Lawsuits, or Complaints

Title VI List of Active Investigations (as of August 2016)

There are no active investigations conducted by entities other than FTA.

WTA received our first complaint on June 24, 2016. The person alleged unequal treatment on WTA fixed route services, being denied access, believed to be because of their race. After conducting an investigation, WTA found no evidence on intent to discriminate based on race or any difference in treatment based on race. We have closed the investigation as of July 25, 2016. The filer has 30 days from July 25, 2016 if they wish to appeal the decision.

# chapter 7:

## Notice to the Public

---

### Overview

In order to comply with Title VI 49 CFR Section 21.9(d), WTA shall provide information to the public regarding the agencies Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

### Transit Guide

Included in the transit guide under Accessibility and Non-Discrimination is the following statement:

The Whatcom Transportation Authority provides services and employment on a non-discriminatory basis, and complies with Section 504 of the Rehabilitation Act of 1973, Title VI of the Civil Rights Act and the Americans with Disabilities Act of 1990.

WTA complies with the Title VI of the Civil Rights Act of 1964 which states:

*"No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."*

If you believe that you have been discriminated against by WTA on the basis of your race, color, or national origin, you have the right to file a complaint with WTA. A complete description of the complaint procedures is available at the Bellingham Station or by calling (360) 676-7433.

### Website

WTA's website, [www.ridewta.com](http://www.ridewta.com), states the following:

WTA complies with Title VI of the Civil Rights Act of 1964 which states:

*"No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."*

If you believe you have been discriminated against by WTA on the basis of your race, color, or national origin, you have the right to file a complaint with WTA.

This is followed by a copy of WTA's Title VI Complaint Procedures, as shown on page 17 in this document.

## chapter 8:

### **List of Recent Construction Projects (2014 – 2016)**

---

Whatcom Transportation Authority completed one construction project during 2014-2016. The primary bus stop at Bellis Fair Mall was moved to east Bellis Fair Parkway to improve safety for both buses and riders. This project involved installing four additional street lights, a pedestrian-activated crosswalk, and a significant increase in the amount of covered waiting area. It also improved the likelihood the person will get on the correct bus for their desired destination as buses on one side of the street head to downtown's Bellingham Station and the other side of the street head to Cordata Station.

## chapter 9:

### **Vehicle Assignment**

---

Bus assignment for fixed route is based on maximum daily passenger loads. Routes with lower ridership may be assigned a 30-foot or 35-foot bus rather than a 40-foot bus. Some routes requiring tight turns on narrow streets may be operated with a 30-foot or 35-foot bus rather than a 40-foot bus.

# chapter 10:

## Fixed Route Service Standards

---

### Vehicle Load Standards

(max. passengers on board / # of seats)

Service Type	Adequate	Optimal
High ridership urban service on segments of <10 mins.	<=1.75	<=1.75
Other Urban Service	<=1.4	<=1.25
Rural Intercity (trips 10> mins.)	<=1.25	<=1.0

### Service Headway Minimum Standards

(minutes between buses)

Service Type	Peak Hour	Non-Peak	Evening	Saturday	Sunday
High Frequency Corridors	15	15	30	30	30
Other Urban Service	60	60	...	60	...
Rural Service	90	...	...	...	...

'n/a' indicates that there is no service provided

'...' indicates that service levels are determined on a case by case basis

### On-Time Performance Standard

(% of buses arriving at a transit station within 5 mins. of posted schedule)

Time of Day	Min. %
AM Peak	95%
Mid-Day	95%
PM Peak	90%

### Service Availability

(maximum average distance between stops)

Route Type	Distance Between Stops
Urban	1/4 mile
Rural	1 mile

# chapter 11:

## Transit Amenities by Census Tract

Census Tract	Minority/ Non-Minority	Total Shelters	Total Benches	Census Tract	Minority/ Non-Minority	Total Shelters	Total Benches
1	Minority	5	0	103.01	Non-Minority	3	4
2	Minority	13	9	103.02	Non-Minority	2	7
3	Minority	12	5	103.03	Non-Minority	1	0
4	Non-Minority	10	7	104.01	Non-Minority	2	1
5.01	Non-Minority	6	4	104.03	Non-Minority	0	0
5.02	Non-Minority	6	2	104.04	Non-Minority	0	1
6	Minority	8	3	105.01	Non-Minority	1	3
7	Minority	7	4	105.02	Minority	2	1
8.03	Non-Minority	8	6	106	Minority	4	12
8.04	Non-Minority	3	0	107.01	Non-Minority	0	1
8.05	Non-Minority	2	3	107.02	Minority	1	1
8.06	Non-Minority	2	0	9400	Minority	6	1
9.01	Non-Minority	10	3	<b>Total Minority</b>		<b>79</b>	<b>49</b>
9.02	Non-Minority	1	3	<b>Total Non-Minority</b>		<b>73</b>	<b>60</b>
10	Minority	11	4	<b>TOTAL</b>		<b>152</b>	<b>109</b>
11	Non-Minority	6	9				
12.01	Minority	10	9				
12.02	Non-Minority	2	1				
101	Non-Minority	2	0				
102	Non-Minority	3	1				
103.01	Non-Minority	3	4				