



## City of Needles, California Request for City Council Action

☒ CITY COUNCIL ☐ NPUA

☒ Regular ☐ Special

**Meeting Date:** September 12, 2023

**Title:** Resolution No. 2023-49 approving the Title VI Compliance Plan for the Needles Area Transit

**Background:** As part of the Section 5311 funding for the Needles Area Transit (NAT), the City is required to comply with Title VI of the Civil Rights Act of 1964, including provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients." The initial Title VI Plan was approved in June 2014 and is required to be updated every three years (updates approved in July 2017 and September 2020). This Title VI Compliance Plan update has been prepared by AMMA Transit Planning through funding provided by the San Bernardino County Transportation Authority on behalf of the City of Needles.

**Fiscal Impact:** May be minimal cost to accommodate and provide language assistance to limited English proficient (LEP) individuals but any costs would be covered in the NAT budget -- no general fund expense

**Critical Timeline:** ASAP

**Environmental:** N/A

**Recommendation:** Waive the reading and adopt Resolution No. 2023-49 approving the Title VI Compliance Plan for the Needles Area Transit.

**Submitted By:** Cheryl Sallis, Community Services Manager

**City Management Review:** Positive for RB Date: 8/24/2023

Approved: ☐

Not Approved: ☐

Tabled: ☐

Other: ☐

Agenda Item: 14

RESOLUTION NO. 2023-49

A RESOLUTION OF THE CITY COUNCIL OF THE  
CITY OF NEEDLES, CALIFORNIA, APPROVING  
THE TITLE VI COMPLIANCE PLAN FOR THE  
NEEDLES AREA TRANSIT

WHEREAS, the City of Needles/Needles Area Transit (NAT) desires to comply with Title VI of the Civil Rights Act of 1964, including provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients"; and

WHEREAS, the City Council wishes to authorize approval of the Compliance Plan developed and prepared by the consulting firm AMMA Transit Planning, including applicable Updates, to comply with necessary provisions of the Civil Rights Act.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Needles, California, as follows:

1. The Community Services Manager is authorized to implement components of the Plan in order to meet federal requirements.
2. The Community Services Manager is authorized to implement policies that may be necessary to comply with subsequent revisions or interpretations to the Civil Rights Act.

PASSED, APPROVED AND ADOPTED at a regular meeting of the City Council of the City of Needles, California, held on the 12th day of September, 2023, by the following roll call vote:

AYES:

NOES:

ABSENT:

\_\_\_\_\_  
Mayor

(SEAL)

ATTEST: \_\_\_\_\_  
City Clerk

APPROVED AS TO FORM:

\_\_\_\_\_  
City Attorney

# **Needles Area Transit TITLE VI PROGRAM**

**Updated: September 2023**

**Approved by the Needles City Council: September 12, 2023**

Developed: June 2014

Updated: July 2017 and September 2020



**Needles Area Transit  
City of Needles  
817 Third Street  
Needles, CA 92363**

This document was originally prepared by AMMA Transit Planning in 2014, and updated every three years, most recently in July 2023, through funding provided by San Bernardino County Transportation Authority on behalf of the City of Needles transit program, Needles Area Transit. This Title VI Program, approved by the Needles City Council, complies with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients."

# Needles Area Transit

## TITLE VI PROGRAM

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## Introduction

Title VI of the Civil Rights Act of 1964 protects persons in the United States from being excluded from participation in, denied the benefits of, or subjected to discrimination on the basis of race, color, or national origin in any program or activity receiving federal financial assistance. The Federal Transit Administration (FTA), under the Federal Department of Transportation, requires recipients to adopt a Title VI Program pursuant to FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients.

As a recipient of FTA funds, Needles Area Transit (NAT) is committed to ensuring that its services are delivered and implemented in accordance with Title VI and other non-discriminatory regulations. NAT also complies with non-discriminatory regulations at the state level and ensures that its programs and services comply with Title VI, whether federally-funded or not.

The Circular has general requirements for all recipients and additional guidelines for transit providers based on the type of service, the number of vehicles deployed in peak service hours, and the population of the transit agency's service area. As a deviated fixed route transit provider with less than 50 vehicles and not located in an urbanized area of 200,000 or more in population, NAT must adhere to the following requirements and guidelines:

- 1) Title VI Notice to the Public
- 2) Title VI Complaint Procedures
- 3) Title VI Complaint Form
- 4) List of transit-related Title VI investigations, complaints, or lawsuits
- 5) Public Participation Plan
- 6) Language Assistance Plan
- 7) A table depicting the membership on non-elected committees broken down by race
- 8) Monitoring procedures for Subrecipients
- 9) Title VI equity analysis for the site and location of facilities
- 10) Documentation that the governing board has reviewed and approved the Title VI Program

Additionally, as a deviated fixed route operator, NAT is required to develop the following system-wide service standards and system-wide service policies:

- 1) Effective Practices to Fulfill the Service Standard Requirement
  - Vehicle Load Standard
  - Vehicle Headway Standard
  - On Time Performance Standard
  - Service Availability Standard
- 2) Effective Practices to Fulfill the Service Policy Requirement
  - Vehicle Assignment Policy
  - Transit Amenities Policy

The following sections of this report document how NAT is in compliance with each requirement.

## **Needles Area Transit Service Overview**

Needles Area Transit is a public transit service provided by the City of Needles for its residents and visitors. NAT is a deviated fixed route that runs one circular route through the community and provides deviations for pickups off the route if time allows.

Service runs hourly from 7 am to 7 pm Monday through Friday and 10 am to 5 pm on Saturday.

The City of Needles contracts with Transportation Concepts (TC) to operate its transit program. TC complies with all federal, state, and local requirements.

## **Title VI Notice to the Public**

### **Notice to the Public of Rights under Title VI Needles Area Transit**

Needles Area Transit is committed to ensuring that no person shall be excluded from the equal distribution of its transit services, programs, and resources because of race, color or national origin in accordance with Title VI of the Civil Rights Act of 1964.

- Needles Area Transit provides transit services and operates transit programs without regard to race, color, and national origin in full compliance with Title VI.
- Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI while using Needles Area Transit may file a complaint with the City of Needles. All complaints will be fairly and objectively investigated.
- To file a complaint, you may contact the Community Services Manager by phone: (760) 326-2113 ext. 115 or by visiting the Community Services Manager at 817 Third Street, Needles, CA 92363.
- For more information about Needles Area Transit's Title VI Program and complaint procedures, please contact (760) 326-2113; or visit the City of Needles website: [www.cityofneedles.com](http://www.cityofneedles.com)
- A complainant may file a complaint directly with the Federal Transit Administration Title VI Program Coordinator: FTA Office of Civil Rights, East Building, 5th Floor – TCR, 1200 New Jersey Ave., S.E., Washington, D.C. 20590.
- If information is needed in another language, contact (760) 326-2113
- Si necesita información en otro idioma, contacte al (760) 326-2113



## **Notificación al Público Sobre los Derechos en Virtud del Título VI Needles Area Transit**

Needles Area Transit está comprometida a garantizar que ninguna persona será excluida de la distribución equitativa de sus servicios, programas y recursos por motivos de raza, color u origen nacional, de conformidad con el Título VI del Acta de Derechos Civiles de 1964.

- Needles Area Transit ofrece servicios y opera programas sin distinción de raza, color y origen nacional en plena conformidad con el Título VI.
- Cualquier persona que crea o que ha sido perjudicada/o por una práctica discriminatoria ilegal en virtud del Título VI durante el uso de los servicios de tránsito de Needles Area Transit, puede presentar una queja ante el Needles Area Transit. Todas las quejas serán investigadas de manera justa y objetiva.
- Para presentar una queja, puede ponerse en contacto con Needles Area Transit al (760) 326-2113 ext. 115 o visite Needles Area Transit en 817 Third Street, Needles, CA 92363.
- Para obtener más información sobre el programa del Título VI y del procedimiento de quejas de Needles Area Transit contacte a (760) 326-2113 o visite el sitio web: [www.cityofneedles.com](http://www.cityofneedles.com)
- Un demandante puede presentar una queja directamente con la Administración Federal de Tránsito del Programa del Título VI de la Oficina de Derechos Civiles: Title VI Program Coordinator, FTA Office of Civil Rights, East Building, 5th Floor - TCR, 1200 New Jersey Ave., S.E., Washington, D.C. 20590.
- Si necesita información en otro idioma, contacte al (760) 326-2113.

List of Locations Where Title VI Notice Is Posted

Needles Area Transit's Title VI notice to the public is posted at the following locations:

Location Name	Address
City Administrative Offices	817 Third Street, Needles, CA 92363
NAT Vehicles	
NAT does not serve any public transit centers or stations	

The Title VI notice and program information is also provided on the City of Needles website at:  
[www.cityofneedles.com/transit](http://www.cityofneedles.com/transit)

## 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 Needles Area Transit may file a Title VI complaint by completing and submitting the Title VI Complaint Form. Needles Area Transit investigates complaints received no more than 180 days after the alleged incident. Needles Area Transit will only process complaints that are complete. The following procedures will be followed to investigate formal Title VI complaints:

- Within 10 business days of receiving the complaint, Needles Area Transit Title VI Program Administrator 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.
- The investigation will be conducted and completed within 30 days of receipt of the formal complaint. The complainant will be notified in writing of the cause to any planned extension to the 30-day rule.
- If more information is needed to resolve the case, Needles Area Transit may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the Title VI Administrator. If the Administrator is not contacted by the complainant or does not receive the additional information within 10 business days, Needles Area Transit can administratively close the case.
- A case can also be administratively closed if the complainant no longer wishes to pursue their case.
- Following the investigation, the Title VI Administrator will issue one of two letters to the complainant: 1) a closure letter or 2) a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A 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 is unsatisfied with the decision, she/he has 30 days after the date of Needles Area Transit closure letter or the LOF to appeal to the Needles City Council or its designee. The complainant is entitled to review the denial, to present additional information and arguments, and separation of functions (i.e. a decision by a person not involved with the initial decision). The complainant is entitled to receive written notification of the decision of the appeal and the reasons for it.
- The complainant may also file a complaint directly with the Federal Transit Administration, as follows: Title VI Program Coordinator, FTA Office of Civil Rights, East Building, 5th Floor - TCR, 1200 New Jersey Ave., S.E., Washington, D.C. 20590.  
<https://ftawebprod.fta.dot.gov/OCF/OnlineComplaintForm/CreateOnlineComplaintForm>



## Procedimientos de Quejas del Título VI

Cualquier persona que cree o que ha sido objeto de discriminación por motivos de raza, color u origen nacional por Needles Area Transit puede presentar una queja del Título VI, completando el Formulario de Queja del Título VI de Needles Area Transit. Needles Area Transit investigará las quejas recibidas no más de 180 días después del supuesto incidente. Needles Area Transit sólo procesará las denuncias que sean completas. Los siguientes procedimientos serán seguidos para investigar las quejas formales del Título VI:

- Dentro de los 10 días hábiles de haber recibido la queja, el administrador de Title VI de Needles Area Transit la revisará para determinar si nuestra oficina tiene jurisdicción. El autor recibirá un acuse de recibo informando a él / ella si la queja será investigada por nuestra oficina.
- Se llevó a cabo la investigación y se terminó dentro de los 30 días siguientes a la recepción de la queja formal. El denunciante será notificado por escrito de la causa a cualquier ampliación prevista de la norma de los 30 días.
- Si se necesita más información para resolver el caso, Needles Area Transit puede ponerse en contacto con el demandante. El demandante tiene 10 días hábiles desde la fecha de la carta para enviar la información solicitada al administrador de Title VI. Si el administrador no está en contacto con el reclamante o no recibe la información adicional dentro de los 10 días hábiles, Needles Area Transit administrativamente puede cerrar el caso.
- El denunciante será notificado por escrito de la causa a cualquier ampliación prevista de la norma de los 30 días.
- Un caso también puede ser cerrado administrativamente si el autor ya no desea seguir su caso. Tras la investigación, el administrador de Title VI emitirá una de las dos cartas a la demandante: 1) una carta de cierre o 2) una carta de encontrar. En una carta de cierre se resume las alegaciones y afirma que no había una violación del Título VI, y que el caso se cerrará. En carta de encontrar resume los hechos denunciados y de las entrevistas sobre el supuesto incidente, y explica si alguna acción disciplinaria, se producirá la formación adicional del miembro del personal, u otra acción.
- Si el demandante no está satisfecho con la decisión, él / ella tiene 30 días después de la fecha de la carta de cierre de Needles Area Transit o carta de encontrar para apelar a la junta directiva de Needles Area Transit o el personal autorizado. El demandante tiene derecho a revisar la negación, para presentar información y argumentos adicionales, y para la separación de funciones (es decir, una decisión de una persona no involucrada con la decisión inicial). El demandante tiene derecho a recibir una notificación por escrito de la decisión de la apelación y las razones para ello.
- El demandante también puede presentar una queja directamente con la Administración Federal de Tránsito, de la siguiente manera : Coordinador del Título VI del Programa , FTA Oficina de Derechos Civiles, Edificio Este , 5 ° piso - TCR , 1200 New Jersey Ave, SE, Washington, DC 20590. <https://ftawebprod.fta.dot.gov/OCF/OnlineComplaintForm/CreateOnlineComplaintForm>

## Title VI Complaint Form

Available at: <https://cityofneedles.com/transit/>

<b>Section I: Please write legibly</b>		
1. Name:		
2. Address:		
3. Telephone:	3.a. Secondary Phone <i>(Optional)</i> :	
4. Email Address:		
5. Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
<b>Section II:</b>		
6. Are you filing this complaint on your own behalf?	YES*	NO
*If you answered "yes" to #6, go to Section III.		
7. If you answered "no" to #6, what is the name of the person for whom you are filing this complaint? Name:		
8. What is your relationship with this individual:		
9. Please explain why you have filed for a third party:		
10. Please confirm that you have obtained permission of the aggrieved party to file on their behalf.	YES	NO
<b>Section III:</b>		
11. I believe the discrimination I experienced was based on <i>(check all that apply)</i> : <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin		
12. Date of alleged discrimination: <i>(mm/dd/yyyy)</i>		
13. 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.		

**Title VI Complaint Form, Page 2**

<b>Section IV:</b>		
14. Have you previously filed a Title VI complaint with Needles Area Transit?	YES	NO
<b>Section V:</b>		
15. 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"/> State Agency _____ <input type="checkbox"/> Federal Court _____ <input type="checkbox"/> Local Agency _____ <input type="checkbox"/> State Court _____		
16. If you answered "yes" to #15, provide information about a contact person at the agency/court where the complaint was filed.		
Name: _____		
Title: _____		
Agency: _____		
Address: _____		
Telephone: _____		Email: _____

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

Signature and date are required below to complete this form:

Signature \_\_\_\_\_ Date \_\_\_\_\_

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

Community Services Manager

ATTN: Title VI

817 Third Street

Needles, CA 92363



## Título VI Formulario de Queja de Needles Area Transit

Disponible en: <https://cityofneedles.com/transit/>

<b>Sección 1:</b>		
1. Nombre:		
2. Dirección:		
3. Teléfono (casa):	3.a. Teléfono (móvil o trabajo):	
4. Correo Electrónico:		
5. ¿Usted requiere formatos accesibles? ¿Cuáles?		
<b>Sección 2 -</b>		
6. Cuenta con la persona que sufrió la discriminación (si es diferente a la persona que presenta la denuncia):		
7. Nombre y dirección:		
8. Su relación:		
9. Explique la razón por la que presenta la queja como tercera persona:		
10. Confirme que cuenta, con el permiso de la parte agravada para presentar esta queja como tercera persona:	SI	NO
<b>Sección 3:</b>		
11. ¿Cuáles de las siguientes razones describe mayor el motivo de su queja? Fue por su: [ ] Raza      [ ] Color      [ ] Origen nacional		
12. ¿Cuándo ocurrió la supuesta discriminación?		
13. En sus propias palabras, describa la supuesta discriminación. Explique lo que pasó y quién considera usted que fue responsable. Por favor utilice el reverso de este formulario si necesita espacio adicional.		

**Título VI Formulario de Queja de Needles Area Transit, Página 2**

Sección 4:			
14. ¿Cuenta con alguna queja previa sobre discriminación según el Título VI con Needles Area Transit?	Si, por este incidente	Si, por otro incidente	No
Sección 5:			
15. ¿Ha llevado esta queja a alguna otra agencia o a una corte? <input type="checkbox"/> SI* <input type="checkbox"/> NO *En caso afirmativo, marque cada casilla que corresponda: <input type="checkbox"/> Agencia Federal _____ <input type="checkbox"/> Agencia Estatal _____ <input type="checkbox"/> Corte Federal _____ <input type="checkbox"/> Agencia Local _____ <input type="checkbox"/> Corte Estatal _____			
16. Por favor proporcione información sobre una persona de contacto en la agencia o corte donde se presentó la denuncia:			
Nombre:			
Dirección:			
Agencia :			
Teléfono			
Correo Electrónico:			

Usted puede adjuntar cualquier material escrito o cualquier otra información que considere relevante para su denuncia.

Por favor firme a continuación para dar fe que es cierto la información que está proporcionando.

Firma del denunciante \_\_\_\_\_

Fecha \_\_\_\_\_

Complete y envíe este formulario a:

Community Services Manager

ATTN: Title VI

817 Third Street

Needles, CA 92363



## **List of Transit-Related Title VI Investigations, Complaints, and Lawsuits**

Needles Area Transit has not been involved in or received any transit-related Title VI investigations, complaints, or lawsuits. NAT will track any complaints it receives to include in the next Title VI Program update.

## **Table Depicting the Membership of Non-Elected Committees and Councils**

This requirement is not applicable as Needles Area Transit does not have any non-elected committees or councils.

## **Public Participation Plan**

According to FTA 4702.1B, recipients of federal funding are required to promote inclusive public participation and seek out and consider the needs and input of the general public, including interested parties and those traditionally underserved by existing transportation systems, such as minority and Limited English Proficient (LEP) persons.

The Public Participation Plan is the established process or plan that describes the proactive strategies, procedures, and desired outcomes of a recipient's public participation activities. Consistent with federal guidelines, Needles Area Transit developed its Public Participation Plan by undertaking a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available to Needles Area Transit.

Needles Area Transit's Title VI Public Participation Plan is provided in Attachment A.

## **Language Assistance Plan**

Needles Area Transit is required to take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of its programs or activities for LEP populations. FTA Circular 4702.1B details the components of the Language Assistance Plan, including the Four Factor Analysis, which provides a careful analysis of LEP persons that the recipient may encounter to determine the specific language services that are appropriate to provide.

Needles Area Transit undertook the Four Factor Analysis and developed appropriate language assistance planning and services based on the results. The resultant Language Assistance Plan will assist Needles Area Transit in effectively implementing the requirements and communicating with LEP individuals.

The Language Assistance Plan is provided in Attachment B.

## **Description of Subrecipient Monitoring and Schedule of Subrecipient Title VI Program Submissions**

This requirement is not applicable as Needles Area Transit does not have any subrecipients at this time and does not anticipate expanding to include subrecipients.

## **Title VI Equity Analysis**

As it has not sited any new facilities or built any facilities in the time between its 2020 submittal and this 2023 Update, Needles Area Transit was not required to conduct a Title VI Site Equity Analysis.

## **Effective Practices to Fulfill the Service Standard Requirement for Fixed Route Services**

### **Vehicle Load Standard**

The average of all loads during the peak operating period should not exceed the following load factors for that type of service:

Local Routes: Peak loads should not exceed 1.25 passengers / seat

### **Vehicle Headway Standard**

Local Routes: Headways will be 60 minutes, Monday through Saturday.

## On-Time Performance Standard

### Local Routes:

- Definition: On-Time will be defined as from the scheduled stop time to 5 minutes after the scheduled time
- Minimum Standard: 90% of all reported time-points will be on-time.
- Target Standard: 95% of all reported time-points will be on-time.

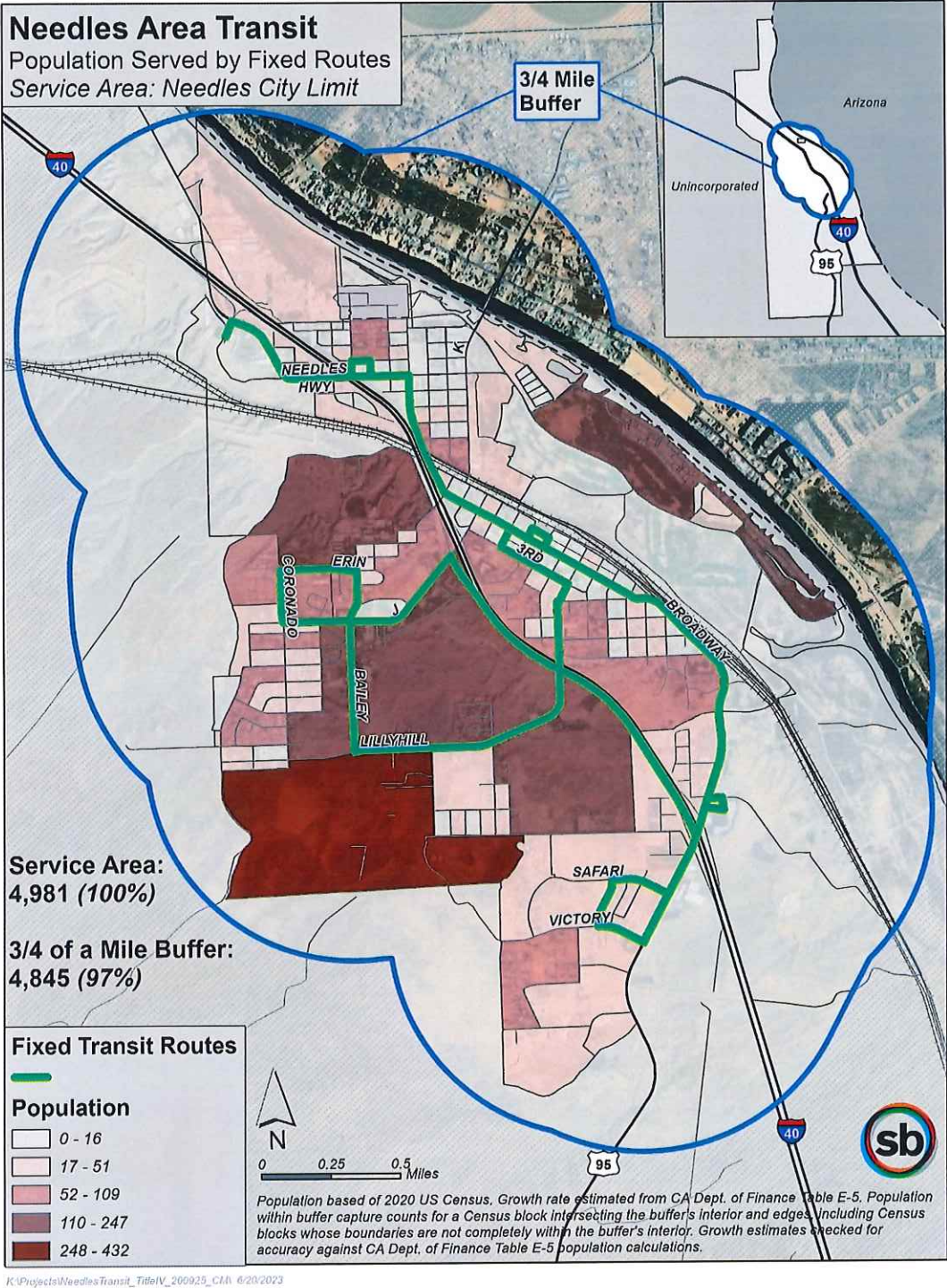
## Service Availability Standards

### 1. Proximity to Service

Local Routes: Minimum Standard: Throughout Needles Area Transit service area, 95 percent of the population should be within  $\frac{3}{4}$  miles of the fixed route.

NAT is currently exceeding this standard. The map below demonstrates Needles Area Transit's current service availability: 4,845 individuals, or 97% of the service area population are within  $\frac{3}{4}$  miles of NAT's fixed route. As population counts are not available from the American Community Survey data at the Census block level, population numbers for this analysis are estimates based on 2020 Census data and growth rate estimates from CA's Department of Finance.

Needles Area Transit Service Availability



## 2. Bus Stop Spacing

Local Routes: Bus Stops will be located at major intersections, turning points in the routes, and major destinations and no more than ¾ mile between stops in the same direction of travel.

# Effective Practices to Fulfill the Service Policy Requirement

## Vehicle Assignment Policy

Local Routes: NAT is presently operated using two vehicles which are identical in age and features. When additional/new vehicles are added to this service, vehicle assignments will be made to ensure equal usage of all vehicles on a monthly basis except for non-availability due to mechanical breakdown.

## Transit Amenities Policy

Local Routes:

- **Bus Stop Benches:** will be placed at all bus stops that experience a minimum of 10 boardings per weekday, as funding becomes available, for stops that are on public property or within the public right-of-way (see notes below).
- **Bus Shelters:** will be placed at all bus stops that experience a minimum of 20 boardings per weekday, as funding becomes available, for stops that are on public property or within the public right-of-way (see notes below).
- **Rail shelters and platform canopies:** NAT does not operate rail services.
- **Transit Information Displays:** will be placed at all bus stops that experience a minimum of 20 boardings per weekday, as funding becomes available, for stops that are on public property or within the public right-of-way (see notes below). This includes route schedule, bus stop time points, contact information.  
**Digital equipment:** NAT does not have any digital equipment nor have any plans or funding to acquire such equipment.
- **Escalators:** NAT does not own or operate any facilities with escalators.
- **Elevators:** NAT does not own or operate any facilities with elevators.
- **Waste receptacles:** NAT provides and maintains a trash receptacle at one of its busier stops, Dollar General. If funding becomes available, bus stops that experience a minimum of 20 boardings per weekday will be given priority for placement of a trash receptacle.  
NAT does not provide recycling receptacles.

**Notes on Transit Amenities Policies:**

Transit amenities shall only be placed on public property and/or within the public right-of-way and as funding becomes available for these purposes.

These policies will be implemented through an analysis of present amenity placement, refinement of the policy standards, and a phased program, as funds become available, to achieve compliance with the policies.

**Needles City Council's Approval of Needles Area Transit's Title VI Program**

Documentation the Title VI Program was approved by the Needles City Council is attached.  
**Insert board resolution or minutes.**



# **Needles Area Transit TITLE VI PUBLIC PARTICIPATION PLAN**

**Updated: September 2023**

**Approved by the Needles City Council: September 12, 2023**

Developed: June 2014

Updated: July 2017 and September 2020



**Needles Area Transit  
City of Needles  
817 Third Street  
Needles, CA 92363**

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## Introduction

### PURPOSES OF THIS PLAN

As part of its Title VI Program, Needles Area Transit reviewed and enhanced its public participation processes. This includes developing strategies for engaging minority and Limited English Proficient (LEP) individuals. This plan provides guidelines for involving the public in Needles Area Transit transit-related planning efforts to ensure that all groups are represented and their needs considered during planning processes.

Needles Area Transit is committed to ensuring it serves the City of Needles consistently and in the most cost-efficient and appropriate manner within available resources. Through conversation and collaboration with riders, prospective riders, and the larger surrounding community, Needles Area Transit will be able to assess the quality of its service, measure potential impacts to the community from Needles Area Transit transit-related initiatives or proposed initiatives, and ensure that it is providing a valuable and accessible service.

### DEMOGRAPHIC ANALYSIS OF NEEDLES AREA TRANSIT'S SERVICE AREA

Needles Area Transit serves the City of Needles. According to the 2021 American Community Survey, the population of Needles is 4,921. Characteristics for the population are provided here.

#### Age

- Nearly a quarter (23%) of the population is under 18 years old.
- 59% of the population is 18 – 64 years old.
- 18% are older adults (65 and over).

#### Race and Ethnicity

- White: 57%
- Black: 5%
- Native American and Alaska Native: 9%
- Asian: 1%
- Two or More: 6%
- Hispanic: 23%

#### Poverty

More than 1,700 people, or 35.7%, live below the poverty line. This includes.

- 52% of children under 18 live below the poverty line.
- 11% of older adults (65 and over) live below the poverty line.

**Limited English Proficient Populations**

Needles City, California		
Speak English less than "very well"	Estimate	Percent of Total
Total Population over 5 years	4,724	100%
Spanish	67	1%
Chinese (incl. Mandarin, Cantonese)	26	1%
Other and unspecified languages	2	0%

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates, Table C16001

**Public Participation Process****APPROACH TO PUBLIC PARTICIPATION**

The public participation process should be considered at the earliest stages of any transit project that may impact the surrounding community, its riders, and potential riders. As projects vary in time and size, the public participation process may vary for each, as well as the extent of public participation. The following outlines tools and strategies to ensure that public input is invited and all foreseeable impacts to the community are considered.

At the beginning of any project, staff will identify which strategies will be appropriate and effective for that given task and develop an approach. For larger projects, those conducted by contractors, part of the RFP requirements and criteria for scoring proposals will include development of that project's public participation process.

**OUTREACH REQUIREMENTS AND ACTIVITIES**

The following activities are intended to serve as guidelines for minimum levels of outreach to ensure that all riders and potential riders in Needles Area Transit have equal access and opportunity to participate in transportation planning and decision-making. These also provide strategies for soliciting input and engaging various LEP communities.

**Minimum Outreach Requirements**

- Notice for public events may include posters, email blasts to agency-level stakeholders, media releases to local papers, or radio announcements if funding allows.
- Any notices will be posted at least two weeks prior to the public event.
- Notices may be posted at Needles Area Transit public spaces, on buses and at bus shelters as appropriate and at key community centers, such as the Senior Citizens Center.
- Information about public participation opportunities will also be posted on the City of Needles' website at least two weeks prior to the event.
- Comments will be accepted at public outreach events, via email, by mail, and by fax to ensure that all populations have the opportunity to participate.

**Outreach Methods to Engage Minority and Limited English Proficient Populations**

Though there are no LEP populations that meet the Safe Harbor Threshold and written translation is not required, Needles Area Transit is committed to making its services accessible to all individuals. Needles Area Transit may use the following strategies to make its services accessible to LEP and other traditionally underserved populations:

- Notices may be developed in Spanish for significant participation opportunities, those relating to fare changes, major services changes, or if requested and it is feasible for Needles Area Transit to do so.
- Future bill stuffers that include transit information may be translated into Spanish as is appropriate.
- Needles is a very small, isolated community which enables distributing key information at high-traffic locations and to key community gatekeepers. Needles Area Transit will continue to distribute its printed materials and participation notices to key contacts who can get transit information to their clients. Needles Area Transit will also monitor this list of contacts, ensuring information is accurate.
- Needles Area Transit will distribute event information to community groups and agencies that work with LEP populations, if such contacts exist.
- Needles Area Transit will ensure that non-English language interpretation will be available at any public meeting relating to public transportation where it is requested at least 72 hours in advance and is feasible to provide.
- Needles Area Transit will continue cultivating relationships with community agencies that serve LEP populations.
- Public outreach events may include attending already existing community meetings and gatherings, such as school meetings, faith-based events, and other community activities to invite participation from LEP populations who may not attend Needles Area Transit hosted public events.

Needles Area Transit will continue assessing the language needs of citizens in its service area through processes established by its Language Assistance Plan. At such time that another

group with limited English proficiency reaches significant mass, Needles Area Transit will review this plan and its strategies to engaging with non-English speaking populations.

## Summary of Outreach Efforts

### REOCCURRING EFFORTS

- Needles Area Transit places comment cards and its flyer/schedule on its buses
- Transit information is available on the City of Needles website.
- Transit flyer/schedule is posted at the transportation office, social service locations, and Colorado River Medical Center.
- PASTACC: Needles is a voting member in SBCTA's Public and Specialized Transportation Coordination Council. Needles regularly participates in the quarterly meetings of this group that encourages coordination between human services and public and specialized transportation.

### PROJECT AND PLANNING-RELATED OUTREACH EFFORTS

#### 2023

- SBCTA's 2023 Mobility Needs Hearing: Needles hosted a remote hearing site and promoted the public hearing on mobility needs throughout San Bernardino County.
- SBCTA's Transit Equity Day Countywide promotion, including free fares on public transit.
- Needles will undertake its Short Range Transit Plan process in the fall of 2023. This effort will include a robust engagement process.
- Needles is a participant in the Mobility Working Group for SBCTA's Long Range Multimodal Transportation Plan effort currently underway.
- Needles is a participant in SBCTA's Countywide Student Free Fare approved in 2023. This program launched with the start of the 23/24 school year. In Needles, students from kindergarten through college can ride Needles Area Transit for free.

Due to health and safety concerns during the global COVID-19 pandemic, Needles Area Transit did not conduct much in-person outreach during 2020 – 2022. However, Needles Area Transit participated in the following marketing and outreach activities and campaigns.

#### 2022

- SBCTA's Transit Equity Day Countywide promotion, including free fares on public transit.

**2021**

- Countywide Health and Safety “Welcome Back” Campaign: During early 2021 San Bernardino's transit operators launched a multi-phased, joint messaging campaign to welcome riders back after the pandemic.
  - Phase 1 – So glad you're back! Focused on Clean. Assuring riders that it was safe to use transit as all agencies were adhering to APTA's health and safety commitments.
  - Phase 2 – Mask on? Phone on? Get on and GO! Focused on Easy. Encouraging riders to use the technology tools that make transit easy, while gently reminding them that masks are required.
  - Phase 3 – You're Free to Go. Focused on Ready for You. Offering free rides in conjunction with Car Free Day.

# **Needles Area Transit LANGUAGE ASSISTANCE PLAN**

**Updated: September 2023**

**Approved by the Needles City Council: September 12, 2023**

Developed: June 2014

Updated: July 2017 and September 2020



**Needles Area Transit  
City of Needles  
817 Third Street  
Needles, CA 92363**

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## Introduction

This Language Assistance Plan was developed in 2014 as part of Needles Area Transit's Title VI Program and updated every three years, consistent with FTA guidelines. This update was prepared in July of 2023. The Title VI Program complies with federal requirements and ensures that Needles Area Transit (NAT) services are provided without discrimination on the basis of race, color, or national origin. Through this Language Assistance Plan and the Public Participation Plan, the Title VI Program also ensures that Needles Area Transit provides limited English Proficient (LEP) individuals with meaningful access to NAT's services, resources and participation processes.

This Plan complies with regulation established by FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," October 1, 2012.

## LANGUAGE ASSISTANCE GOALS

Needles Area Transit is committed to making its services and programs available to LEP persons as part of its compliance to Title VI of the Civil Rights Act of 1964. Needles Area Transit is committed to providing meaningful access for LEP individuals to NAT's services, resources, and information by developing a Language Assistance Plan and by regular evaluation of the developed methods and strategies.

## NEEDLES AREA TRANSIT SERVICE OVERVIEW

Needles Area Transit is a public transit service provided by the City of Needles for its residents and visitors. NAT is a deviated fixed route that runs one circular route through the community and provides deviations for pickups off the route if time allows. Service runs hourly from 7 am to 7 pm Monday through Friday and 10 am to 5 pm on Saturday.



## Results of the Four Factor Analysis and Description of LEP Population(s) Served

### FACTOR 1: NUMBERS OF LEPS ELIGIBLE TO BE SERVED

Data from the American Community Survey identifies several Limited English Proficient populations within the City of Needles, NAT's service area. As demonstrated below, there are two populations reported in the 2017-2021 American Community Survey (ACS) 5 Year Estimates that speak English less than "very well." Spanish LEPs number 67 individuals, making up 1% of Needles population. Two additional group of LEPs, Chinese (Mandarin and Cantonese) and Other languages, make up 1% or less of the population.

All LEP populations fall within the Safe Harbor Provision of less than 1,000 persons or 5%.

#### Safe Harbor Provision

According to the Safe Harbor Provision Guidance provided in FTA C 4702.1B, Chapter III-9, Needles Area Transit is not required to translate vital materials.

NAT recognizes that Spanish speakers do make up an important proportion of its riders and community as detailed in the following factors. To best serve these individuals, it has translated the Title VI Notice to the Public, Complaint Form, and Complaint Procedures into Spanish. Additionally, NAT has developed a language assistance program to ensure meaningful access to LEP individuals, which is detailed in a later section of this Plan.

#### LEP Populations in Needles Area Transit's Service Area

Speak English less than "very well"	Estimate	Percent of Total
Total Population over 5 years	4,724	100%
Spanish	67	1%
Chinese (incl. Mandarin, Cantonese)	26	1%
Other and unspecified languages	2	0%

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates, Table C16001

Additional characteristics about the LEP populations includes the following:

#### Literacy of LEP Communities

Based on past LEP intercept surveying and interviews with community agencies, the LEP communities in Needles, particularly the Spanish-speaking community, are literate and would be served by translated materials.

**Are LEPs Underserved Due to Language Barriers**

Needles Area Transit has not received any calls from Spanish speakers, other LEPs, or for requests for language assistance despite promotion of its language assistance and Title VI policies. This does not confirm that LEPs are underserved due to language barriers, but does speak to limited interaction with LEPs and that LEP's may be finding the transit information they need.

**FACTOR 2: FREQUENCY WITH WHICH LEPS COME INTO CONTACT WITH PROGRAM**

Needles Area Transit reviewed past interaction with LEP individuals since the last Title VI Update to understand the frequency of and how NAT interacts with LEPs.

**Written comments/complaints**

NAT has not received comments or complaints in Spanish or any language other than English.

**Requests for Translations/Language Line**

NAT has not received Language Line or other requests for translation or interpretation in Spanish or any language other than English.

**Calls/Visits**

NAT has not received any calls or visits in Spanish or any language other than English.

**Outreach Responses**

- There have been no responses or comments received in Spanish or requests for translation during outreach activities.

**Staff interaction with LEP Individuals**

City staff was surveyed about their interaction with LEPs, including six transit staff and three city utilities staff.

- Staff reported that they infrequently or never interact with LEP individuals. One city utilities staff reported weekly interaction.
- Five individuals have interacted with Spanish-speaking LEPs and two staff members interacted with Chinese-speaking LEPs since the last Title VI Program Update.
- LEP were interested in information about bus routes and schedules.
- Some staff are bilingual and were able to translate or asked another bilingual member to translate.

**Factor 2 Findings**

Survey and other data suggest that although some LEPs may use NAT services, they do not interact with transit staff frequently. Evidence supporting this includes:

- LEP Spanish speakers make up 1% of the service area population, with other LEP groups at smaller percentages.
- There have been no responses or comments received in Spanish or requests for translation during outreach activities.
- Needles Area Transit has not received any requests for language assistance since the last Title VI Update.

### **FACTOR 3: THE NATURE AND IMPORTANCE OF PROGRAM TO LEPS LIVES**

Needles Area Transit understands that its services are used by all groups for life-sustaining and essential activities, such as transportation to work, grocery shopping, non-emergency medical appointments, as well as life-enriching activities, such as school, and social events. For transit-dependent individuals, NAT services are gravely important. For this reason and to maintain full compliance with FTA C 4702.1B, Needles Area Transit is committed to providing meaningful access to its services.

### **FACTOR 4: RESOURCES AVAILABLE FOR LEP OUTREACH AND COSTS OF OUTREACH**

As Needles is a very small community, LEP outreach can be done through many cost-effective measures. A large proportion of outreach will be possible through continuing to cultivate relationships with key contacts within the LEP populations. As identified in NAT's Public Participation Plan, keeping these contacts informed of NAT activities, services and events, and working with them to connect with the LEP populations will be an important outreach activity with little or no associated costs.

Resources that have been identified, as well as available costs, are detailed below, including several potential outreach strategies that may be utilized as is appropriate and funding is available.

Resource for LEP Outreach	Associated Costs
Posted Notice to the Public with language assistance information around the community and on buses	Free to very low cost
Posting updates, event notices, language assistance information, etc. around the community and on buses	Free to very low cost
Distributing information to community agencies, such as human service agencies, Palo Verde Community College, Colorado River Medical Center	Free to very low cost
Including transit information with City utility bills	Free to very low cost
NAT's Language Assistance Plan and Public Participation Plan	Free to very low cost every three years
Assistance and resources provided by San Bernardino County Transportation Authority (SBCTA)	Free to very low cost
Partnerships and outreach opportunities provided by membership in SBCTA's PASTACC (Public and Specialized Transportation Advisory and Coordination Council)	Free to very low cost
Posting information on City of Needles website	Very low cost
Translation, as needed	\$80 - \$150 per translated page
Oral interpretation, as needed	Determined on a case-by case basis.

# Implementation Plan

## RESPONSIBILITY FOR IMPLEMENTATION

Needles Area Transit's overall Title VI Program and Language Assistance Program will be implemented by the City of Needles Community Services Manager's office.

Community Services Manager  
817 Third Street  
Needles, CA 92363  
(760) 326-2113 ext. 115

## LANGUAGE SERVICE PROVISION

This implementation plan details how Needles Area Transit ensures meaningful access to LEP individuals through language assistance. Though NAT is not required to translate vital materials under the Safe Harbor Provision, it has developed the following measures to provide language assistance.

### Responding to LEP individuals

1. LEP individuals are invited to call the City of Needles with any questions or concerns or visit the Community Services Manager's Office.

Language assistance is first provided by any staff members that are bilingual in English and Spanish, as appropriate. If a bilingual staff member is not available or the individual speaks a language other than Spanish, interpretation can be provided over the phone.

The City of Needles has a contract with Language Line Services Inc. to provide interpretation over the phone or over video as needed.

2. Needles Area Transit is a service of the City of Needles. As a City with many departments and personnel, Needles has accommodated and provided language assistance to limited English proficient individuals through various means and will continue using all available resources to make its services accessible to all individuals.

### Oral interpretation

Simultaneous interpretation at public events will be determined on a case-by-case basis by examining several factors, such as:

- The type and size of event
- The availability of a staff member or a host organization to interpret, etc.
- Requests received at least 72 hours before an event

**Translation of Vital Documents:**

1. Needles Area Transit is not required to translate vital documents according to the Safe Harbor Provision. However, the Title VI Notice to the Public, Complaint Procedures, and Complaint Form have been translated into Spanish as a courtesy to riders.
2. The extent of Needles Area Transit's ability and obligation to continue translating written documents will be determined on a case-by-case basis by looking at elements presented in the Four Factor Analysis and the nature of the written material.
3. When future materials are to be translated the following guidelines will be used:
  - Vital documents include, but are not limited to: Title VI materials and forms; Rider information and brochures; materials that provide access to essential services; information about public participation and input opportunities.
  - As Spanish speakers are the largest LEP group reported by the US census and by LEP outreach, Spanish translation will be considered first. NAT staff will continue to monitor the change in LEP populations, as detailed in Section 4.

**City of Needles/Needles Area Transit's Website:**

1. It is not currently appropriate or feasible for the City of Needles to translate all portions of its website; however, the following provisions apply:
2. The following materials are available in Spanish on the City of Needles' website: Title VI Notice to the Public; Title Complaint Procedures; Title VI Complain Form.
3. As any future materials are deemed appropriate for translation, such as the NAT schedule, they will be posted on the website.

**OUTREACH/NOTICE OF AVAILABILITY OF LANGUAGE ASSISTANCE**

1. To ensure that LEP individuals are aware of language assistance measures, Needles Area Transit has included information about language assistance in its Title VI Notice to the Public.
2. Title VI information is available on the website in English and Spanish.
3. Staff will inform residents about the Language Assistance Program during any outreach and transit-orientation activities.
4. Staff will continue developing relationships with organizations that serve LEP individuals and developing strategies to spread awareness of Needles Area Transit's Language Assistance Program and transit services.

## MONITORING, EVALUATING AND UPDATING THE LAP

A thorough review of this Language Assistance Plan (LAP) will be undertaken every three years concurrent with updating and submitting the Title VI Program. At that time, the LEP population will be reassessed to ensure all significant LEP languages are included in Needles Area Transit's language assistance efforts. The following reoccurring reporting and evaluation measures will be used to update the Language Assistance Plan:

1. NAT will regularly assess the effectiveness of how NAT and contracted staff members communicate with LEP individuals by:
  - Including questions about language assistance and information needs on any transit surveys
  - Conversations with community agencies that work with LEPs
  - Rider surveys or other input opportunities may be available in LEP languages, particularly Spanish, as appropriate.
2. Staff will track its language assistance efforts, including:
  - Reporting transit staff interactions with LEP
  - Reviewing American Community Survey data for updated demographics.

## STAFF TRAINING

Needles Area Transit requires Title VI compliance and languages assistance training of its operations contractor, Transportation Concepts (TC), including implementing a program to train employees to provide timely and reasonable language assistance to limited English proficient (LEP) populations

Transportation Concepts LEP Policy is provided below.

### **Transportation Concepts Non-English Speaking Customers Policy**

As providers of public transportation, we may encounter customers who have limited English-speaking skills. Customer service and service operators, who are the most direct point of contact for those with limited English proficiency (LEP), have several options when responding to an LEP individual.

In many instances, LEP individuals are accompanied by a companion who speaks English and can translate for the customer. In addition, some bus operators are bilingual.

If you are an employee who is not bilingual, ask for assistance from a bilingual person. When you have a customer with whom you have difficulty communicating, and there is no other person nearby who can translate, contact management immediately.

If the customer's primary language is Spanish, Management will be able to provide assistance through different assisted methods. If you are assisting a customer and there is no one available to speak Spanish, please take the person's information and state that someone will be in touch with them within a 24 hour period, pre-printed on comment card.

Please remember, we are in the business of providing safe and reliable transportation to our customers. If you have any questions regarding the LEP policy, please make sure you follow up with management for clarification.