



Mountain Line Title VI Program and Implementation Plan

Effective February 1, 2024 thru January 30, 2027

Updated January 17, 2024

Title VI Program

Executive Summary

Northern Arizona Intergovernmental Public Transportation Authority (NAIPTA), doing business as Mountain Line, is an independent special district that is responsible for providing public transportation services in Northern Arizona, specifically in the City of Flagstaff, on Northern Arizona University campus, and in parts of Coconino County. Mountain Line has been providing these programs since 2006. Mountain Line has been a grantee of federal funds since 2006 and uses a combination of various federal funds, including section 5307, 5310, 5311, and 5339, and matching funds from our partner agencies to provide services.

Mountain Line is led by our CEO and General Manager who reports to our Board of Directors. Our Board of Directors is made up of appointed and elected officials from our partners as required by statutes that allowed for the creation of an Intergovernmental Public Transportation Authority. The CEO and General Manager carries out the directives of the Board and our Partners with a Title VI Officer, Management Services Director, Marketing and Communications Manager, Safety Manager and Operations Director. The Title VI Officer oversees the planning functions of the agency and federal compliance. The Management Services Director oversees finance, human resources, IT and federal compliance. The Operations Director oversees the operations division, including fixed route, paratransit, fleet, facilities and training. Marketing and Communications Manager oversees public communications and the Safety Manager is responsible for risk management.

Title VI (codified at 42 U.S.C §2000d et seq.) was enacted as part of the landmark Civil Rights Act of 1964 signed by President Lyndon B. Johnson. It prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

In accordance with the FTA Title VI Circular, Mountain Line is required to submit a Title VI Program triennially. The Title VI Program is a compilation of documents, plans, maps, policies and standards, etc. that demonstrate Mountain Lines compliance with Title VI. Guidance provided by FTA Title VI Circular 4702.1B requires approval of Mountain Line's Title VI Program by its Board of Directors.

Non-Discrimination Policy Statement

The Mountain Line policy assures full compliance with Title VI of the Civil Rights act of 1964 as well as the Restoration Act of 1987, section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 (ADA), and related statutes and regulations in all programs and activities. In accordance with Title VI and other civil rights statutes, no person shall on the grounds of age, sex/gender, ability, race, color, national origin, gender identify or expression, and sexual orientation be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any Mountain Line sponsored program or activity. There is no distinction between the sources of funding.

Mountain Line also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies and activities on minority and low-income populations. Furthermore, Mountain Line will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When Mountain Line distributes Federal-aid funds to another entity/person, Mountain Line will ensure all sub-recipients fully comply with Mountain Line Title VI Non-Discrimination Program requirements. The CEO and General Manager has delegated the authority to Title VI Officer, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

Heather Dalmolin

Heather Dalmolin
CEO and General Manager

The Table of Contents was created from FTA Title VI Circular 4702.1B,
Appendix A-1: Title VI Program Checklist.

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I. General Requirements

Section 1: Title VI Notice to the Public, including a List of Locations Where Posted

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, recipients shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, etc. Recipients should also post Title VI notices at stations, stops, and/or on transit vehicles. The notices shall be translated into languages other than English, as needed and consistent with the DOT LEP Guidance and the recipient's language assistance plan.



Title VI Notices and Locations



Non-Discrimination Notice to the Public

Know your Rights

Mountain Line operates its programs and services without regard to age, sex/gender, ability, race, color, national origin, gender identify or expression, and sexual orientation in accordance with Title VI and other civil rights statutes. **To request additional information on Mountain Line's Title VI and other anti-discrimination obligations or if information is needed in languages other than English or other formats, please contact Mountain Line Customer Service Center at:**

phone (928) 679-8900

TTY (800) 367-8939

fax (928) 779-6868

email transportation@mountainline.az.gov

Any person who believes that he or she has been subjected to discrimination under Title VI or other civil rights statutes may file a complaint with Mountain Line.

Complaints must be filed within 180 days of the alleged discriminatory act. Please call Mountain Line or submit your complaint in writing to the Civil Rights Division using the contact information below:

<http://mountainline.az.gov/naipta-information/customer-rights/>

MOUNTAIN LINE Civil Rights Division
Attn: Title VI Officer
3773 N Kaspar Dr
Flagstaff, AZ 86004
Ph: (928)-853-9461
Email: cweaver@mountainline.az.gov

Complaints may also be filed directly with the Federal Transit Administration at www.fta.dot.gov; the Arizona Department of Transportation Civil Rights Office at <http://azdot.gov/business/civil-rights/contact-us-new>; or Equal Employment Opportunity Commission at www.eeoc.gov. Please review information on the respective agency websites for details on filing Title VI complaints.

If information is needed in another language or format, please contact Mountain Line's Customer Service Center at (928) 679-8900.

Si necesita informacion en Espanol, por favor comuniquese con el Departamento de Servicio al Clienle de Mountain Line al (928) 679-8900.



Aviso de no discriminación al público

Conozca sus derechos

Mountain Line, por sus siglas en inglés) brinda sus programas y servicios sin tener en cuenta la edad, el sexo/género, la capacidad, la raza, el color, la nacionalidad, la expresión o la identificación de género ni la orientación sexual según el Título VI y otros estatutos de derechos civiles. Para pedir más información sobre el Título VI de Mountain Line y otras obligaciones antidiscriminación o en caso de que necesite esa información en otros idiomas distintos del inglés o otros formatos, contacte al Departamento de Servicio al Cliente de Mountain Lineal:

Teléfono (928) 679-8900

TTY (800) 367-8939

Fax (928) 779-6868

Correo electrónico

transportation@mountainline.az.gov

Cualquier persona que crea que haya sido víctima de discriminación bajo el Título VI u otros estatutos de derechos civiles podrá presentar una queja a Mountain Line.

Las quejas deben presentarse dentro de los 180 días del acto de supuesta discriminación. Llame al Director General Adjunto de Mountain Lineo envíe su queja por escrito a la División de Derechos Civiles con la siguiente información de contacto:

<http://mountainline.az.gov/naipta-information/customer-rights/>

División de Derechos Civiles Mountain Line

Attn: Oficial de Título VI

3773 N Kaspar Dr

Flagstaff, AZ 86004

Tel.: (928)853-9461

Correo electrónico:

cweaver@mountainline.az.gov

Las quejas también se pueden presentar a la Administración Federal del Tránsito en www.fta.dot.gov; a la oficina del Departamento de Derechos Civiles en el Transporte en <http://azdot.gov/business/civil-rights/contact-us-new>; o a la Comisión de Igualdad de Oportunidades en www.eeoc.gov. Revise la información en las respectivas páginas web de las agencias para consultar los detalles de la presentación de quejas en el Título VI.

Si necesita información en otro idioma o formatos, contacte al Departamento de Servicio al Cliente de Mountain Lineal (928) 679-8900.

Non-Discrimination Notice to the Public

List of Locations Where Posted

Website: www.mountainline.az.gov

Mountain Line Ride Guides

Mountain Line buses

Transit Centers/Administrative Offices:

1. Mall Connection Center, Mall Way
2. Downtown Connection Center, Phoenix Ave
3. Mountain Line Main Office, Kaspar Drive

Section 2: Discrimination Complaint Procedure

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. FTA requires direct and primary recipients to report information regarding their complaint procedures in their Title VI Programs in order for FTA to determine compliance with DOT's Title VI regulations.

Mountain Lines complaint process and form are professionally translated into languages as recognized as vital to our services in our Limited English Proficiency Plan. Mountain Line used MetroPlan (Flagstaff's metropolitan planning organization) data, American Community Survey data and community outreach to identify the languages during the development of its Limited English Proficiency Plan.



Discrimination Complaint Process

Complaint Process

Mountain Line is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis race, color, or national origin (including Limited English Proficiency), as provided by Title VI of the Civil Rights Act of 1964, as amended, or on the basis of age, sex/gender, ability, gender identity or expression, and sexual orientation as provided by other civil rights statutes.

Mountain Line's objective is to:

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

Mountain Line grants all citizens equal access to all its transportation services. It is further the intent of Mountain Line, that all citizens are aware of their rights to such access. This information is to serve as an educational tool for citizens so that they may understand one of the civil rights laws that protect their benefit of Mountain Line programs and services, specifically, as it relates to Title VI of the Civil Rights Act of 1964.

What is Title VI

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

Note that Title VI does not address age, ability, sex/ gender, gender identity or expression, or sexual orientation discrimination. It only covers race, color, and national origin. Other Civil Rights laws, including state and local regulations prohibit these forms of discrimination.

Who are Limited English Proficient Persons?

Persons who do not speak English as their primary language and who have limited ability to read, speak, write, or understand English can be limited English proficient, or "LEP." These individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter.

Different treatment based on a person's inability to speak, read, write, or understand English may be a type of national origin discrimination.

For more information

To request additional information on Mountain Line's Title VI and other anti-discrimination obligations or if information is needed in languages other than English, please contact Mountain Line Civil Rights Division or Mountain Line's Title VI Officer at:

- phone (928) 679-8900
- TTY (800) 367-8939
- fax (928) 779-6868
- email transportation@mountainline.az.gov

Mountain Line Title VI Program and Implementation Plan

How do I file a complaint?

If you believe that you have received discriminatory treatment by the Mountain Line on the basis of your age, sex, ability, race, color, national origin, gender identity/expression, and sexual orientation, you have the right to file a complaint with the Mountain Line Title VI Officer in the Civil Rights Division. The complaint must be filed no later than 180 calendar days of the alleged discriminatory incident.

Methods of filing a Complaint

The preferred method is to file your complaint in writing using the Title VI Complaint Form, and sending it to:

Mountain Line Civil Rights Division
Attn: Title VI Officer
3773 N Kaspar Dr
Flagstaff, AZ 86004

Or via email to transportation@mountainline.az.gov and cweaver@mountainline.az.gov

Complaints must include the complainant(s) name, address, and phone number. The complaint must be signed by the complainant(s). For complaints submitted via email, the email address and complainant(s) name will be treated as the complainant(s) signature.

All complaints will be acknowledged in writing within 3 business days of receipt of the signed complaint and the acknowledgement will include whether the complaint is to be investigated by Mountain Line or referred to external entities.

Complaints may also be filed with external entities: the Federal Transit Administration at www.fta.dot.gov; the Arizona Department of Transportation Civil Rights Office at <http://azdot.gov/business/civil-rights/contact-us-new>; or Equal Employment Opportunity Commission at www.eeoc.gov. Please review information on the respective agency websites for details on filing Title VI complaints.

Should a complaint be filed with Mountain Line and an external entity simultaneously, the external complaint shall supersede the Mountain Line complaint and Mountain Line's complaint procedures will be suspended pending the external entity's findings.

Should Mountain Line receive a complaint related to Mountain Line's program provided through Arizona Department of Transportation Section 5310 or 5311 funding, specifically vanpools or taxi vouchers, Mountain Line will notify ADOT within 72 hours via telephone at 602.712.8946; or email at civilrightsoffice@azdot.gov.

Investigations

Within 10 working days of receipt of the formal complaint, the Title VI Officer will notify the complainant and begin an investigation (unless the complaint is filed with an external entity first or simultaneously).

The investigations will address complaints against any Mountain Line department(s). The investigation will be conducted in conjunction with and under the advice of the Civil Rights Division.

The investigation may include discussion(s) of the complaint with all affected parties to determine the problem. The complainant may be represented by an attorney or other representative of his/her own choosing and may bring witnesses and present testimony and evidence in the course of the investigation.

The investigation will be conducted and completed within 60 days of the receipt of the formal complaint.

Based upon all the information received, an investigation report will be written by the Title VI Officer for submittal to the CEO and General Manager.

The complainant will receive a letter stating that final decision by the end of the 60 day time limit. Most investigations are completed within 30 days.

The complainant shall be notified of his/her right to appeal the decision. Appeals may be made to the Federal Transit Administration, the Arizona Department of Transportation, or the Equal Employment Opportunity Commission.

A copy of these procedures can be found online at: <http://mountainline.az.gov/naipta-information/customer-rights/>.



Mountain Line

3773 N. Kaspar Drive · Flagstaff, AZ 86004 · 928-679-8900 · FAX 928-779-6868 · www.mountainline.az.gov

Updated: October 20th, 2023

Policy: Process for Public Comment and Complaint

Goal: Establish a guideline and process for handling public comments and complaints, as well as mechanism for tracking and investigation.

Contact: Codi Weaver
928.853.9461
cweaver@mountainline.az.gov

Receiving Comments or Complaints

Mountain Line receives various types of comments and complaints. This procedure recognizes each type and assigns related process by type.

General Comments and Complaints, including complaints regarding violations under Title VI (Discrimination complaints):

1. The public comment hotline will be provided 24 hours a day for citizens with questions, comments, or complaints. The hotline number is posted on all vehicles and made available to the public on printed schedules and on website.
2. Calls will be taken during regular business hours by Operations Supervisors in the dispatch office or Administrative Staff at the front desk.
3. An email address will be provided on Mountain Line website through both the Contact Us link and the Customer Rights page. Access to Customer Rights page will be provided through a link on every page within the Mountain Line website. The email address is also made available on vehicles and in Mountain Line facilities on the Customer Rights/Title VI notice.
4. Public Comment cards are available in the office and on the buses. The cards are removed from locked comment boxes at the end of each service day and submitted to Administrative Staff at the front desk.
5. All comments/complaints will be investigated by senior level staff with contact made to caller within 3 business days as applicable.
6. All comments/complaints will be recorded in the Comments and Complaints database. Detailed description of comment should be obtained with date, time and location of incident as well as caller's name/number if possible.
7. All investigation notes will be entered into the database, along with resolution of comment or complaint. Investigations and complaints are to be marked closed at resolution.
8. The Management Services Director will report to the management team all open comments & complaints as well as complaints closed within the period on a quarterly basis. Management may make recommendations on additional actions, including training to respective supervisors based on trends or reoccurring complaints.

Getting you where you want to go





Mountain Line

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9. All Title VI complaints will be handled as per the Title VI Policy, Section 2 Title VI Complaint Procedure. Title VI complaints are defined as complaints regarding denial of benefits, exclusions of participation, or subjection to discrimination on the grounds of race, color, or national origin. As per state and local regulations, Title VI discriminatory complaints include discrimination based on age, ability, sex/gender, gender identity or expression, or sexual orientation. As deemed necessary, Title VI complaints are subject to discussion with Board of Directors.
 10. All documents regarding Title VI complaints, including print out of complaint from database and closing letter will be maintained in the Title VI file with the Deputy General Manager.
 11. All complainants will be offered an opportunity to participate in public meetings conducted by the Board of Directors.
- ** All comments and complaints whether left on hotline, conveyed through email, or taken during business hours by staff will be handled as described above.

Fare and Service Change Comments, including those received during public comment period:

1. A public comment line will be enacted whenever Mountain Line is conducting a public comment period or has posted invitations for public comment regarding service changes. The public comment line will be provided 24 hours a day for citizens with questions, comments, or concerns.
 2. Calls will be taken during regular business hours by Administrative Staff at the front desk.
 3. An email address will be made available on posted signs at stops and on vehicles.
 4. Any comments received via Public Comment cards available in the office and on the buses will be processed by Administrative Staff at the front desk.
 5. All comments will be assigned to planning staff with contact made to caller within 2 business days as applicable.
 6. All comments will be recorded in the Fare and Service Changes database. Detailed description of comment should be obtained with date, time, and route or stop information as well as caller's name and number if possible.
 7. All investigation notes will be entered into the database, along with resolution of comment. Investigations and comments are to be marked closed at resolution.
 8. The Transit Planner will report to the management team all open comments within the period at the close of the comment period. Management team may make recommendations or take additional action prior to information in summary form being reported to the Board as part of the comment period for fare and service changes.
 9. All commenters will be offered an opportunity to participate in public meetings conducted by the Board of Directors.
- ** All comments whether left on hotline, conveyed through email, or taken during business hours by staff will be handled as described above.

Getting you where you want to go



Section 3: Discrimination Complaint Form

In addition to developing complaint procedures, recipients must also develop a Title VI complaint form, and the form and procedure for filing a complaint shall be available on the recipient's website.

The Discrimination Complaint form is available on our website at <http://mountainline.az.gov/naipta-information/customer-rights/>

Discrimination Complaint Form

Mountain Line
Civil Rights Division

Mountain Line is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis race, color, or national origin (including Limited English Proficiency), as provided by Title VI of the Civil Rights Act of 1964, as amended, or on the basis of age, sex/gender, ability, gender identity or expression, and sexual orientation as provided by other civil rights statutes. Complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact the Civil Rights Division by calling (928) 679-8903. The completed form must be returned to Mountain Line Civil Rights Division, Attn: Title VI Officer, 3773 N Kaspar Dr, Flagstaff, AZ 86004 or via email: transportation@mountainline.az.gov or cweaver@mountainline.az.gov.

Your Name:	Phone:
Street Address:	Alt Phone:
Person(s) discriminated against (if someone other than complainant): Name(s):	
Street Address, City, State & Zip Code:	

Date of Incident: _____

Which of the following best describes the reason for the alleged discrimination? (Circle All That Apply)

Title VI protections:

Race

Color

National Origin (LEP)

Other Civil Rights Statutes:

Age

Ability

Sex/Gender

Sexual Orientation

Gender Identity/Expression

Please describe the alleged discriminatory incident. Provide the names and titles of all Mountain Line employees involved, if available. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.

Discrimination Complaint Form

Mountain Line
Civil Rights Division

Please describe the alleged discriminatory incident (continued) _____

Have you filed a complaint with any other federal, state or local agencies? (Circle one) Yes / No

If yes, list agency / agencies and contact information below:

Agency: _____	Contact Name: _____
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Street Address, City, State & Zip Code: _____	Phone: _____
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Agency: _____	Contact Name: _____
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Street Address, City, State & Zip Code: _____	Phone: _____
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I affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Complainant's Signature: _____	Date: _____
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Print or Type Name of Complainant _____

Mountain Line Office Use Only:

Date Received: _____

Received By: _____

Section 4: Discrimination Investigations, Complaints, and Lawsuits

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

The list of complaints and investigations since the submission of Mountain Line's Title VI Program in 2018 is shown on Table 1.

Table 1: Discrimination Complaints and Investigations

Title VI Complaints for 2021 thru 2024

Date	Complaint	Service/Program	Summary of Allegation	Agency Handling	Investigator Assigned	Investigation Notes	Complaint (C) or Lawsuit (L)	Status	Action/Response Required	GM Review
	Discrimination- racial	Flood Route	Was at the DCC ready to board route 4 when driver let another gentleman on the bus, looked at me and then shut the door as I was standing there with packages. I asked him why he wasn't letting me on and even asked him if he was being racist but he didn't answer. When he came back, he still didn't. Caller stated that he knew he was racially profiled by the driver and supervisor. He stated he was waiting at the stop for a particular bus at a particular time and the supervisor came and called him racial slurs. Caller said he made a formal complaint with the FPD. He stated that the bus kept continuously driving by without stopping. During the message the caller kept referring to legal jargon repeating that he declared the <i>Kelchman for his time and cannot make another of</i>	NAPITA	Kate Morley	Video showed operator board bus and manual close doors before several passengers were able to board, go to his seat, close his COVID barrier and immediately open door and welcome complainant on board. Actions were appropriate to allow closed COVID barrier before close proximity of passengers.	C	Transcribed complaint for confirmation by complainant. Investigation complete.	Will discuss customer service to alter passengers to hold for a moment. Notified complainant.	HD 02.22.2021
3/14/2021	Discrimination- racial	Flood Route		NAPITA	Kate Morley	this individual was trespassing at the bus stop and made to attempt to board the bus (twice), and would not respond to the operator or supervisor when asked if he was going to ride the bus.	C	called complainant to confirm verbal complaint per Title VI policy and received no response. Investigation complete.	Investigation found Operations followed procedures for individuals trespassing at bus stops without riding.	HD 02.22.2021
3/23/2020	Discrimination- racial	Flood Route	Route 4 driver intentionally delayed pulling into the DCC, causing a missed transfer because they are a " racist SOB."	NAPITA	Kate Morley	Video showed operator waiting for space to open at the DCC before he could pull in, a new, different, operator had pulled into wrong spot, taking his spot. No interaction between Operator and rider can be seen.	C	called complainant to confirm verbal complaint per Title VI policy. Customer confirmed accounted but doesn't have email for written verification.	Investigation found no indication of discriminatory behavior by the operator.	HD 03.26.2021
4/28/2021	Discrimination- disability	Flood Route	Specific driver continues to give passenger a hard time about kneeling the bus for them.	NAPITA	Kate Morley	Complainant never called back. Ops followed up because time/ route info doesn't match and they wanted to confirm. She told them she doesn't want to provide more information.	C	Called complainant to confirm issue on 4-29. Left message. Investigation closed.	Ops will send generic reminder to all staff since we could not further investigate.	HD 05.04.2021
5/11/2021	Discrimination- racial	Flood route	Complaint of dirty looks, not being allowed to ride even though a mask and another driver being rude due to retaliation of previous complaint.	NAPITA	Kate Morley	Number of complaint does not work after multiple attempts. Video shows lack of customer service for complainant by Operator including statements not based on fact. Operator has had repeated complaints of racism.	C	Recommendation provided to Supervisor. Investigation complete.	Implicit Bias training recommended for original Operator. Further recommend it be one on one with trainer referring to video.	HD 06.21.2021, driver has since been terminated for several performance issues including customer service
9/29/2021	Discrimination- racial	Flood route	Complaint driver asks inappropriate personal questions and harassment on basis of race including questions about age of child, marital status and asked to fold up stroller through policy changed.	NAPITA	Kate Morley	Video shows Operator asking about age of child in relationship to federal mask mandate and enforcement of rules. Tensions escalate between both parties when answer is not given. Operator does ask about marital status but then apologizes. Operator does ask about stroller but when calls base to confirm change in policy (approx. 2 weeks earlier) does not continue to ask. No answers were denied. Video shows When the passenger first boarded at Steve's Blvd, She did not ask for the driver to lower the bus. Tries to scan card on the barcode reader. Doesn't seem to understand directions and gets frustrated. before Operator can get out of her seat to assist the passenger another passenger from the back comes up and helps scan their pass. Later in the day at the	C	Verbal complaint confirmed via email. Investigation complete and complainant notified of outcome and mailed video per FOIA. 10-13-2021	Ops Manager and Title VI coordinator talked with Operator about de-escalation techniques.	HD 11.11.2021
10/21/2021	Discrimination- disability	Flood Route	Complaint that bus driver did not lower bus several time during day through obviously struggling to get in.	NAPITA	Kate Morley	Video shows incident heat quickly over fare payment in general when customer could not get change for \$20 bill. Not giving change is aligned with policy. Driver offered amount for discount day rate about being pointed to disability. Passengers were appropriately banned per policy due to behavior.	C	Investigated and closed 10-22-2021	Operator reminded to lower if needed	HD 11.11.2021
11/5/2021	Discrimination- disability and racial	Flood route	Complaint that driver was charging person with disability extra and racial discretion for being banned for day.	NAPITA	Kate Morley	Video shows incident heat quickly over fare payment in general when customer could not get change for \$20 bill. Not giving change is aligned with policy. Driver offered amount for discount day rate about being pointed to disability. Passengers were appropriately banned per policy due to behavior.	C	No response from complainant. Investigated and closed- 11-10-2021	Investigation found no indication of discriminatory behavior by the operator or Supervisor.	HD 11.11.2021
11/19/2021	Discrimination- racial	Flood Route	Operator yelled from the front of the bus about ID for boarding then proceeded to stop the bus in the middle of the route and kick off Indian woman, its unclear the woman understood Operator or ask for ID.	NAPITA	Kate Morley	From watching a variety of random videos of the Operator, he strictly enforces showing IDs across the board and it does not based solely on race. However, it is our policy to ensure people understand the direction they are given which is not clear from video or incident report.	C	Sent email with follow up, close. Training on LEP policy with Operator.		HD 12.06.2021
3/11/2022	Discrimination- racial	Flood Route	Complainant, Hispanic, came up to the bus at the DCC the driver pointed and said you need a mask, rudely stating there were signs everywhere. The rider complied. A native American gentleman had a challenge getting the mask on and the driver came out of the seat yelling at the Native American. At the next stop the driver permitted a Caucasian man to board with his mask below his nose and did not say anything aloud. The complainant was at back of bus so may have misread something said but didn't hear anything.	NAPITA	Kate Morley	No civil rights violations found as treatment of all individuals was consistent and the Caucasian man was also required to put a mask on.	C	Followed up with complainant and closed.	Investigation found no indication of discriminatory behavior by the operator however complaint is being referred to Operations for customer service.	Kate and I discussed verbally and I concurred with investigation and closed in April. I failed to note approval here. HD 09-26-2022
9/20/2022	Discrimination- Racial	Flood Route	Time it too to resort the system was inconvenient. Let a white passenger Board without paying and then denied a native American boarding without fare.	NAPITA	Kate Morley	Complainant withdrew complaint when called to confirm complaint per policy. Watch video and saw no passengers denied boarding.	C	Closed.	Operations to review console reboot procedures.	HD 09-26-2022

9/17/2022	Discrimination- Racial	Road Route	Operator on Route 14 at 2pm 9-17-2022 at Walmart has a history of being rude, particularly to black people. She is mean-spirited and grumpy to black to people. She won't move the bus or look at date when pass won't scan, just makes us wait there but let's others on without even looking. She called a black NAU student back to see her ID but no other NAU students had to. She won't kneel the bus even when we sit, though she will for white people automatically. One older lady almost fell. Needs to stop.	NAUPTA	Kate Morley	Caller confirmed complaint. Watched video and saw customer service concerns but no racial discrimination. Reviewed filer for civil rights complaint history with Operator and found none.	C	Closed. Emailed complainant findings.	Operations will review customer service standards with Operator.	HD 09-30-2022
9/18/2022	Discrimination- Racial	Road Route	Rider complaint that was he passed up at DCC twice. Route 4 driver drive away last round when he was roughly 7 ft from door approaching bus to board. Next time route 4 drove thru without stopping.	NAUPTA	Kate Morley	Watched video of related rounds. In first round, as bus is moving you can just see complaint step out from behind bus. Bus left on time and was not early. It was not possible to see complainant until bus was just starting to move. On second round, the bus parks in a totally different spot, this time street side. In order to start its round, the bus has to pull through the bus bays to go back out to Beaver to start the route. It appears as if the bus didn't stop however had been parked outside. No discrimination found.	C	Closed complaint.	No further action	HD 09-30-2022
1/3/2023	Discrimination- Racial	Road Route	Missed passenger at bus stop. Didn't even slow down. Believe likely motivated by prejudice.	NAUPTA	Kate Morley	Called, left message. Reviewed video. Heavy snowstorm, passenger is in shelter with full jacket, pants and hat with back to the Operator. Not possible to make out race of individual. Operator notices late and with icy conditions may not be able to stop in time. Spoke with complainant on 1/25. Nothing specific about this incident drove complainant to think it was racially motivated. Generally believes discriminated against regularly in life.	C	Closed complaint.	Referred to Operations regarding pass up.	HD 01-27-2023
1/18/2023	Discrimination- Racial	Road Route	Dropped day pass instead of keeping it (change made 8 months ago). Driver wouldn't allow to Board until next round when gave a day pass. Believe probably motivated by racism.	NAUPTA	Kate Morley	Called, left message 1/20. Spoke with complainant on 1/25. Nothing specific about this incident drove complainant to think it was racially motivated. Generally believes discriminated against regularly in life. Reviewed video, complaint as described but no indication of racial motivation.	C	Closed complaint.	Operations to review customer service provided. Day pass provided to complainant for incident.	HD 01-27-2023
2/7/2023	Discrimination- Racial	Road Route	Route never stopped at DCC. Anarchy is rule with racist jokes. Legal action should be taken. They system is racist.	NAUPTA	Kate Morley	Called and left message on 2/8/2023. Reviewed video and bus was parked for 10 minutes at DCC. However, pulled out of stop to maneuver around DCC 1.5 minutes early, then waited in drive aisle for departure time where no customers would know to get on the bus, not just this one.	C	Closed complaint.	Referred to Operations for correction of leaving early. Offered to strategize with Mr. Anderson about repeated miss buses through travel training.	HD 02-08-2023
3/9/2023	Discrimination- Ethnic	Road Route	Complainant's girlfriend has accent. Was trying to Board Route 10 with NAU ID but was not pulling up correctly on phone. Was rude and did not explain, signaling in the way and asked to get off. Other drivers have allowed her to ride by verifying email/pass through NAU account.	NAUPTA	Kate Morley	Verified complaint with complainant on 3-8. Upon review of video, Operator followed policy in denying boarding. No sign of discrimination.	C	Closed complaint.	Referred to Ops to consider customer service and timely return to bus at DCC.	HD 03-15-2023
3/1/2023	Discrimination- age	Road Route	Complainant said Operator refused to Board an elderly person. Complainant and his mother boarded the bus before without paying a fare, as they weren't sure how much to pay. They had questions about the fare and the driver was rude and unpolite, screaming that they needed to pay. The complainant said it was a shameful experience and he wondered if they were treated that way	NAUPTA	Kate Morley	Called complainant and left message to verify complaint. No response. Viewed video, passenger was offered boarding and chose not to board.	C	Closed complaint.	No action needed.	HD 03-06-2023
4/24/2023	Discrimination - Racial	Road Route	Complainant overheard an operator making fun of a rider's foreign accent. Complainant illegally ran across the street to the bus and the driver waited for her. After she boarded the driver began lecturing her about running across the street and told her he did not have to let her board. The complainant found this upsetting and stated that he was treating her unkindly because she is black. She said it felt like he was "racist harassment."	NAUPTA	Jaceli Lennan	Verified complaint via email on 4/24. Watched video and witnessed customer service concerns but no racial discrimination.	C	Closed complaint.	Referred to Operations to consider customer service training with operator.	HD 05-10-2023
4/28/2023	Discrimination - Ethnic	Road Route	Complainant overheard an operator making fun of a rider's foreign accent. Complainant illegally ran across the street to the bus and the driver waited for her. After she boarded the driver began lecturing her about running across the street and told her he did not have to let her board. The complainant found this upsetting and stated that he was treating her unkindly because she is black. She said it felt like he was "racist harassment."	NAUPTA	Jaceli Lennan	Verified complaint with complainant on 4/24, but learned that she left the message with the complaint a year ago so there is no way to review video.	C	Closed complaint.	Referred to Ops to discuss incident with Operator. Reviewing the voice mail system with IT to ensure this does not happen again.	HD 04-28-2023
4/26/2023	Discrimination - Racial	Road Route	Complainant overheard an operator making fun of a rider's foreign accent. Complainant illegally ran across the street to the bus and the driver waited for her. After she boarded the driver began lecturing her about running across the street and told her he did not have to let her board. The complainant found this upsetting and stated that he was treating her unkindly because she is black. She said it felt like he was "racist harassment."	NAUPTA	Jaceli Lennan	Caller confirmed complaint on 5/3. Watched video and saw customer service concerns but no racial discrimination. Reviewed filer for civil rights complaint history with Operator and found none.	C	Closed complaint.	Operations will review customer service standards with Operator.	HD 05-10-2023
4/26/2023	Discrimination - Disability	Road Route	Complainant said that he is in a wheelchair and both the Route 4 and Route 10 drivers passed him by at the Walmart stop.	NAUPTA	Jaceli Lennan	Lower confirmed complaint on 4/27. Watched video and saw a Route 4 and a Route 10 bus stop at this stop while a gentleman in a wheelchair was in the shelter. He did not make any move to board the bus. He was near the front of the shelter when the next Route 10 bus came by and started to move toward the bus, which stops up from the shelter when it is the first bus to arrive. The driver did not see him coming toward the bus and departed the stop without boarding him. This appeared to be a customer service issue and not a civil rights issue.	C	Closed complaint.	Referred to Operations to discuss incident with the Operator to ensure the adequately scans for riders wanting to board before leaving a stop.	HD 05-10-2023
4/28/2023	Discrimination - Disability	Road Route	There was not a complaint filed, but an Operations Supervisor witnessed a driver refusing to lower a ramp for a rider with a cane while she was conducting a video investigation of a separate incident.	NAUPTA	Jaceli Lennan	Title VI Officer watched video and witnessed the driver deny the request of a rider with a cane to lower the ramp. She is verbally combative with the rider, although she eventually lowers the ramp.	C	Closed complaint.	Provided a written warning to the operator for violating the agency's Title VI Policy. Per the written warning, this operator must attend customer service, de-escalation, and Title VI training.	HD 07/26/2023

5/9/2023	Discrimination - Racial	Road Route	Complainant sent email to the CEO & General Manager stating that one of the drivers is abusive and stares at BPOC. She said that this driver was staring at a Black man outside the bus, and that when she told the driver that she's always staring, the driver walked out the bus when she	NAUPTA	Jacdi Lennam	Reviewed video and the complaint is unfounded.	C	Closed complaint.	No action needed.	HO 05-05-2023
6/26/2023	Discrimination - Racial	Road Route	Complainant called and came to the office to discuss the incident. He said the driver questioned how much money his wife put in the farebox and appeared to be accusing them of shortchanging her. He also said he did not witness any subsequent passengers being treated in the same manner and believes it is because of the color of his skin.	NAUPTA	Jacdi Lennam	Reviewed video and met with operator to discuss incident. The Operator stated that she did not see how much money was placed in the farebox, which is why she questioned what kind of pass they wanted. She says she saw how much was placed in by subsequent passengers or they stated what they wanted. The review of the video shows that the operator quickly escalated the situation with these riders and treats them in a way that she does not treat subsequent passengers. I attempted to call the complainant back to discuss, but he did not have Internet in having a discussion and threatened legal action. Complainant contacted complainant and gave additional details. Complainant stated that the driver said "most people lie about it," referring to a disability status. Complainant did not feel he should be treated this way and it hurt his feelings. Watched video and saw that the operator could have been nicer to the customer, but was not able to validate the caller's complaint. I did not witness the operator telling the customer that "most people lie about it." Operations will review customer service standards with Operator. Complainant told to please let us know if there is any further information. Watched video and witnessed the complainant refuse to have her mobility device secured. When she moved to reach the cord the driver told her she could not move while the bus was in motion. I did not witness rude behavior from the driver. I did note that any rider in a mobility device who refuses to be secured must be positioned in a place where they can reach a human or road.	C	Closed complaint.	Provided a written warning to the operator for violating the agency's Title VI Policy. Per the written warning, this operator must attend customer service, de-escalation, and Diversity/Equity/Inclusion training.	HO 07-06-2023 Note: Complainant has threatened a lawsuit and requested public information. There may be a separate record created, with a copy of this incident and related documents.
7/9/2023	Discrimination - Disability	Road Route	Complainant filled out a comment card stating that a driver accused him of being dishonest about being disabled.	NAUPTA	Jacdi Lennam	Watched video and saw that the operator could have been nicer to the customer, but was not able to validate the caller's complaint. I did not witness the operator telling the customer that "most people lie about it." Operations will review customer service standards with Operator. Complainant told to please let us know if there is any further information. Watched video and witnessed the complainant refuse to have her mobility device secured. When she moved to reach the cord the driver told her she could not move while the bus was in motion. I did not witness rude behavior from the driver. I did note that any rider in a mobility device who refuses to be secured must be positioned in a place where they can reach a human or road.	C	Closed complaint.	Referred to Operations to discuss customer service standards with operator.	HO 7/12/2023
7/12/2023	Discrimination - Disability	Road Route	Complainant stated that the driver was rude to her when she moved her mobility device to reach a pull cord. She said he yelled at her.	NAUPTA	Jacdi Lennam	Watched video and saw that the operator could have been nicer to the customer, but was not able to validate the caller's complaint. I did not witness the operator telling the customer that "most people lie about it." Operations will review customer service standards with Operator. Complainant told to please let us know if there is any further information. Watched video and witnessed the complainant refuse to have her mobility device secured. When she moved to reach the cord the driver told her she could not move while the bus was in motion. I did not witness rude behavior from the driver. I did note that any rider in a mobility device who refuses to be secured must be positioned in a place where they can reach a human or road.	C	Closed complaint.	Referred to Operations to discuss wheelchair securement with this operator and all staff to ensure riders in mobility devices have access to a button or cord.	HO 07/26/2023
10/09/2023	Discrimination- ADA access	Road Route	Driver did not pick up students. Students are disabled. Rider was trying to wave down the bus.	NAUPTA	Codi Weaver	Called rider at 11:05am, Friday (11/9/2023). I told the customer that I was looking into this case and I will be calling him back in 5 days for a conclusion. Customer thanked me and told me that we could drop it. Customer said he wasn't worried about it. (Reference to ADA Log)	C	Closed complaint.	No action needed.	HO 11/14/2023

Section 5: Public Participation Plan

The content and considerations of Title VI, the Executive Order on LEP, and the DOT LEP Guidance shall be integrated into each recipient's established public participation plan, which explicitly describes the proactive strategies, procedures, and desired outcomes that underpin the recipient's public participation activities. Efforts to involve minority and LEP populations in public participation activities can include both comprehensive measures, such as placing notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in a recipient's decision-making process.

Mountain Line Public Participation Plan (PPP) along with the MetroPlan (Flagstaff's metropolitan planning organization) for public planning of transit services are guides for Mountain Line's public participation activities. The purpose of the PPP is to promote the use of effective methods to inform and provide meaningful opportunities for input by all members of the public. In recognition of the importance of having an inclusive process, this plan has a special focus on reaching traditionally under-represented communities such as low-income, minority, and limited English proficient (LEP) populations. The MetroPlan PPP is attached as Exhibit 1.

Mountain Line's public participation efforts over the last three (3) years included: call to the public at all regularly scheduled meetings, public hearings and call for comments when service changes were being evaluated, announcements were made using our rider app and social media regarding proposed changes and information on how to submit comments, and open houses, and virtual events due to public health concerns were conducted as necessary to ensure public is aware of projects and proposed service changes. We utilized free and paid advertising to reach the greatest audience in multiple formats. All service change comments are tracked and responded to with summary reporting made to our Board as part of consideration of proposed changes.



Title VI Public Participation Plan

Invitation for Public Participation

Mountain Line holds regular meetings of the Board of Directors and Transit Advisory Committee. These meetings are held at the Mountain Line Administrative Office in Flagstaff on the 3rd Wednesday and 1st Thursday, respectively. The public is invited to attend and participate in items on the agenda. A public comment period is available during every meeting and the public has 5 minutes to speak on any topic not on the agenda. The public comment period is at the beginning of every meeting.

Meetings are held in the Training Room at Mountain Line, 3773 N Kaspar Dr, Flagstaff, Arizona 86004 or, due to COVID, virtually with log-in information available from the Clerk of the Board.

Call our office @ (928) 679-8900 or TTY (800) 367-8939 for more information on meetings or to request meeting information in accessible formats or languages.

Agendas are posted on our website at least 24 hours in advance of the meeting. Please visit our webpage [http://mountainline.az.gov/naipta-information/board-](http://mountainline.az.gov/naipta-information/board-of-directors/)

[of-directors/](http://mountainline.az.gov/naipta-information/board-of-directors/) to view or print the agenda.

Periodically, Mountain Line will hold public hearings related to service changes, fare changes, or implementation of transit facilities, including shelters and connection centers. Public hearings may also be conducted related to applications for federal funds.

The public is invited and encouraged to attend public hearings, whether to discuss concerns or speak in support of proposed services, improvements, or funding. During public hearings the Board, or Mountain Line staff, will accept comments and input of the public prior to taking action on related items.

Public hearings will also be held related to transit plans and public policies. Individuals interested in being notified about Public Hearings can contact our administrative offices at 928-679-8900 and ask to be placed on our mailing list. Notices about Public Hearings will be placed on our website at <http://mountainline.az.gov/news-events/> and will be advertised in the local newspaper.

If information is needed in another language, please contact Mountain Line's Customer Service Center at (928) 679-8900.

Si necesita informacion en Espanol, por favor comuniquese con el Departamento de Servicio al Cliente de Mountain Line al (928) 679-8900.



Mountain Line

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Updated: January 20, 2020

Policy: Process for Public Participation

Goal: Establish a guideline for inviting public participation.

Contact: Rhonda Cashman, Clerk of the Board

Definitions:

- Fare is a one-way single ride cash fare.
- Service area is the area within a ¼ mile of service, route, or stop.
- Public Meeting is a meeting conducted by Board of Directors or Transit Advisory Committee for purpose of providing direction to staff and hearing public input. All formal action will be taken at a public meeting.
- Open House is a meeting or event held by Mountain Line for purpose of sharing information and gathering input about proposed routes, services, etc.

Public Participation

1. Regular Public Meetings will be conducted by both the Board of Directors and Transit Advisory Committee at least once monthly, except for winter and summer breaks to be determined within annual calendar adopted by the Board.
2. Additional Public Meetings or Open Houses may be arranged by Mountain Line to provide additional opportunity for input.
3. Public Meetings and Open Houses will be held at Mountain Line offices or near areas most affected by service changes to provide easy access and encourage community participation.
4. Public meetings will be regularly announced and notices may be posted in the following media:
 - a. Newspaper
 - b. Radio or PSA |
 - c. Notice of Meetings posted at the Mountain Line administrative offices
 - d. Notice of Meetings posted on Mountain Line website:
<http://mountainline.az.gov/news-events/>
 - e. Notices placed inside transit vehicles
 - f. Direct mail flyers
 - g. Notices sent to community groups for posting and/or publication
5. A comment period of at least 30 days will be initiated by a Public Hearing or Public Meeting prior to any service changes as follows:
 - a. Increase service days or hours by 25% or more in a residential area (i.e. early or later service in residential neighborhood);

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- b. Reduce service days or hours by 25% or more to an area (e.g. eliminating Saturday service on only route that serves a neighborhood);
 - c. Increase service to frequency that is greater than 25% existing frequency (e.g. making 40-minute frequency a 20-minute frequency – doubling bus traffic in a corridor);
 - d. Reduce service to frequency less than 60 minutes to an area (e.g. frequency becomes 75 minutes);
 - e. Eliminates service to an area (e.g. removing service from a neighborhood so that no alternatives are available; 100% reduction of service);
 - f. Any fare increase.
6. Comment cards will be available at all Public Meetings and Open Houses.
7. Final meetings will be held to review public comment, report on decisions and changes at least 30 days prior to effective date.

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Mountain Line Board Meeting Schedule

Mountain Line Board meetings are usually held the 3rd Wednesday of every month, typically from 10-noon except for recesses in July and December. You can find updated Board meeting schedules at <https://mountainline.az.gov/about-us/board-of-directors/>.

The webpage above also includes agendas for upcoming meetings.

Typical annual agenda items occur on the following schedule, though confirming agendas is recommended.

- January: Budget Message and Title VI (triennially, scheduled for 2024)
- February: Workforce Budget Overview
- March: Financial Audit and Biannual performance report
- April: Adoption of the Coordinated Plan; Closure of public comment period and final Service Changes
- May: Joint Meeting (times may vary), Budget proposal
- June: DBE Policy and Goal Setting.
- July: Recess
- August: Bus Stop Program/Rehab Report
- September: Annual Report Adoption
- October: Annual Advance (times may vary)
- November: Strategic Policy updates and Legislative Priorities
- December: Recess

MetroPlan Board Meeting Schedule

MetroPlan Board meetings typically occur the 1st Wednesday of every month at 10am. Updated meeting dates, packets and agendas can be found on their website at <https://www.metroplanflg.org/meetings-agendas>

Review schedule: The program areas are reviewed on a regular basis by the Title VI Program Manager to ensure their understanding of and compliance with Title VI and related authorities.

- January – Title VI Training (annually)
 - Draft TIP
- April – Adoption of TIP

- May – Review Draft UPWP
- June – Title VI Plan Adoption and MetroPlan Title VI training
- November - Adoption of Public Participation Plan



Limited English Proficiency Plan

Section 6: Limited English Proficiency Plan

Consistent with Title VI of the Civil Rights Act of 1964, DOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000), recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP). The recipient shall develop an assistance plan to address the identified needs of the LEP population(s) it services.

The four-factor analysis included in the LEP Plan identifies appropriate language assistance measures needed to improve access to Mountain Line services and benefits by limited English proficient persons (LEP).

Mountain Line supports the goal of the DOT's LEP Guidance to provide meaningful access to its services by LEP persons. This Limited English Proficiency Plan reflects LEP compliance by Mountain Line and its continuous efforts to comply fully with the USDOT/FTA guidelines, ***"Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons; A Handbook for Public Transportation Providers" (April 13, 2007).*** The LEP Plan assesses language needs in the Mountain Line service area.

Mountain Line LIMITED ENGLISH PROFICIENCY PLAN

Updated: January 2021

I. PURPOSE:

The purpose of this policy is to establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964, for Mountain Line staff to follow when providing services to and interacting with, individuals who have limited English proficiency (LEP).

Mountain Line recognizes the importance of effective and accurate communication between personnel and the community that they serve as well as the importance of accessible information for our customers. Language barriers can impede effective and accurate communication in a variety of ways, including preventing individuals with limited English proficiency (LEP) from accessing and/or understanding information about programs, rights, and services, as well as preventing communication in difficult situations. Poor communication or lacking information with LEP community members can present Mountain Line with technical and ethical challenges. Ensuring maximum communication ability between staff and all segments of the service area serves the interests of both.

II. POLICY:

Mountain Line's policy is to take reasonable steps to provide timely, meaningful access to the services and benefits of the various transportation programs provided for LEP persons.

- ❖ All personnel shall provide free language assistance services to LEP individuals whom they encounter or whenever an LEP individual requests language assistance services. Personnel will inform members of the public that language assistance services are available free of charge to LEP persons and that Mountain Line personnel will provide these services to them.
- ❖ Printed route guides and service information material will be printed in multiple formats as identified through meetings with community groups. At minimum, due to large Hispanic population, Mountain Line will provide Spanish versions of route guide and materials.

The steps taken are in consideration of Department of Transportation, Federal Transit Administration guidance including:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
 - A. Excerpt of MetroPlan Title VI and Environmental Justice Plan: LEP Population in and around Flagstaff: there are 96,365 people in the Service Boundaries. The limited English proficient population consists of 3,324 individuals or 3.6% of the total population, with Spanish being the predominant language spoken by LEP individuals. This data was obtained from the 2018 population estimate provided by the American Community Survey. This data will be updated whenever possible.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to people's lives.
4. The resources available to the recipient and costs.

III. DEFINITIONS:

- A. Primary Language: means an individual's native tongue or the language in which an individual most effectively communicates. Personnel should avoid assumptions about an individual's primary language. For example, not all individuals from Central America speak Spanish fluently. Instead, some Central Americans may claim an indigenous language as their native tongue. Personnel should make every effort to ascertain an individual's primary language to ensure effective communication.
- B. Limited English Proficiency: designates individuals whose primary language is not English and who have a limited ability to read, write, speak, or understand English. LEP individuals may be competent in certain types of communication (e.g., speaking or understanding), but still be LEP for other purposes (e.g., reading or writing). Similarly, LEP designations are context-specific: an individual may possess sufficient English language skills to function in one setting, but these skills may be insufficient in other situations.
- C. Interpretation: is the act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning.
- D. Translation: is the replacement of written text from one language (source language) into an equivalent written text in another language (target language).
- E. Bilingual: refers to the ability to use two languages proficiently.
- F. Mountain Line Authorized Interpreter: (Mountain Line-AI) is a bilingual employee or contact who has been authorized to interpret for others in certain situations.
- G. Mountain Line-AI List: is an accounting of personnel or contacts who are bilingual and are authorized to act as volunteer interpreters. The HR Manager will create and maintain the list.

IV. PROCEDURES FOR ACCESSING INTERPRETATION SERVICES:

- A. Personnel Request for Interpretation Services:
 - 1. Responding Personnel Responsibilities: Personnel in the field should anticipate the need of interpretation services (attempt to identify the potential for encountering LEP individual's and their primary language) and contact the Title VI Officer for assistance in requesting training, assistance, or Mountain Line-AI.

Given an informal and non-controversial nature of the need for interpretation services, personnel should first look to use of family, friends or bystanders for interpreting assistance. Personnel should use minor children to provide interpreter services only when no other non-minor is available.

Given a controversial or more personal matter, Mountain Line staff should be aware that using family, friends, or bystanders to interpret could result in a breach of confidentiality, a conflict of interest, or an inadequate interpretation. In such cases, personnel are expected to follow the general procedures outlined in this plan; however, exigent circumstances may require some deviations. In such situations, personnel are to use the most reliable, temporary interpreter available, such as bilingual personnel or citizens, including family, friends and

bystanders. If no Mountain Line-AI is available, personnel should utilize such services available to obtain the LEP individual's contact information, general point of concern and follow up at such time as more appropriate services are available.

B. Contracted In-Person Interpretation Services:

Contracted in-person interpretation services shall be available to all personnel when interacting with LEP individuals. The Title VI Officer will be the central conduit for connecting personnel in the field to an appropriate interpreter.

1. **Accessing Contracted In-Person Interpreters:** Personnel who believe they need this service will consult with the highest-ranking supervisor available. If the supervisor concurs, the personnel will contact the contracted in-person interpreter service, relay all information, and provide for appropriate scope of services and compensation.

NOTE: It is Mountain Line personnel's responsibility to develop and ask any questions. The interpreter's role is to serve as a neutral third party, taking care not to insert his or her perspective into the communication between the parties.

V. INTERVIEWS AND COMPLAINTS:

- A. **Complaint Procedures for LEP Persons:** Any LEP individual who wishes to file a complaint with Mountain Line regarding language access, or the discharge of Mountain Line's duties, shall be provided with complaint forms if possible. Complaints will be investigated by Mountain Line's Title VI Officer with assistance from Mountain Line General Counsel.

VI. PROCEDURES FOR ACCESSING DOCUMENT TRANSLATION SERVICES:

- A. Translation services for documents such as key public involvement products and outreach materials for translation shall be coordinated through the Title VI Officer or the Management Services Director.

VII. TRAINING: LANGUAGE ASSISTANCE POLICY AND INTERPRETER SKILLS:

- A. **LEP Policies:** Mountain Line will provide periodic training to personnel about Mountain Line LEP policies, including how to access Mountain Line-authorized telephonic and in-person interpreters. Mountain Line conducts such training for all new employees and provides ongoing employee training at least every two years.

VIII. MONITORING AND UPDATING LANGUAGE ASSISTANCE EFFORTS:

- A. **Community Review:** Mountain Line shall assess demographic data, review contracted language access services utilization data, and consult with community-based organizations during the triennial update of the Title VI report in order to determine if there are additional languages into which vital documents should be translated upon request.
- B. **Tracking and Analysis of LEP Data:** Mountain Line shall be responsible for assessing demographic data, reviewing contracted language access services utilization data, and consulting with

community based organizations to ensure that Mountain Line is providing meaningful access to LEP persons to the services and benefits of the various transportation programs provided.


Section 7: Minority Representation on Planning and Advisory Bodies

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, “deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program.” Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

Mountain Line has no standing committees that meet the definitions above but may occasionally have committees where members are non-elected and selected by Mountain Line for specific projects. When such committees occur, Mountain Line will conduct self-identification surveys for any such committees. At this time of adoption of this Program, two such committees exist: the DCC Stakeholders Committee and the On Demand Pilot Program Committee.

Mountain Line will, in future assignments to other committees appointed by Mountain Line, utilize the self-identification survey to query interested members about their racial identify and/or ethnicity to create a table depicting the racial breakdown of the committee(s), as well as document efforts to encourage participation of minorities on committee(s).

Self-Identification Survey:



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SELF-IDENTIFICATION SURVEY

Please take a few minutes to help us ensure we have broad representation on our committees and meet our Title VI program. Completing this survey is voluntary. If you choose to respond, please mark all that apply.

- By self-identification, what is your ethnicity (cultural or national origin) and/or race? (You may choose to report more than one race to indicate racial mixture.)
 - ☐ **Hispanic, Latino, or Spanish Origin:** A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
 - ☐ **White:** A person having origins in any of the original peoples of Europe, the Middle East or North Africa.
 - ☐ **Black or African-American:** A person having origins in any of the black racial groups of Africa.
 - ☐ **Native Hawaiian or other Pacific Islander:** A person having origins in any of the peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
 - ☐ **American Indian or Alaska Native:** A person having origins in any of the original people of the North and South American Continent (including Central America), and who maintain tribal affiliation or community attachment.
 - ☐ **Asian:** A person having origins in any of the original people of the Far East, Southeast Asia, or the Indian Subcontinent, including for example, Cambodia, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand or Vietnam.
- Please select your age:
 - ☐ Under 20
 - ☐ 21-39
 - ☐ 40-64
 - ☐ 65+
- Please select your sex:
 - ☐ Female
 - ☐ Male

TITLE VI

Mountain Line operates its programs and services without regard to age, sex/gender, ability, race, color, national origin, gender identify or expression, and sexual orientation in accordance with Title VI and other civil rights statutes. To request additional information on Mountain Line's Title VI and other anti-discrimination obligations or if information is needed in languages other than English, please contact Mountain Line Customer Service Center at:

- o phone (928) 679-8900
- o TTY (800) 367-8939
- o fax (928) 779-6868
- o email transportation@MountainLine.az.gov
- o

Si necesita información en **Español**, por favor comuníquese con el Departamento de Servicio al Cliente de Mountain Line al (928) 679-8900.

Getting you where you want to go




Table 2: Racial Breakdown of the Membership of Advisory Committees

	City of Flagstaff	DCC Stakeholders	On Demand Pilot Program Committee
Approved Membership Positions		12	27
Filled Membership Positions		12	27
Members Completing Survey		3	18
Hispanic, Latino, or Spanish Origin	21.6%		2
White	63.4%	2	14
Black or African-American	1.6%	1	
Native Hawaiian or other Pacific Islander	.4%		
American Indian or Alaska Native	4.8%		2
Asian	3.5%		
Two or More	6.8%		

Outreach Efforts to Encourage Participation

Mountain Line values the ethnic and cultural diversity of the public it serves within the Mountain Line region. Accordingly, Mountain Line actively seeks and encourages the participation of underrepresented groups on its non-elected committees when filling a vacancy.

Mountain Line makes concerted effort to provide the opportunity for qualified individuals from underrepresented ethnic groups to join its advisory committees so that these bodies more accurately represent the ethnic, gender, and geographic diversity of the county.

Mountain Line utilizes a number of strategies to promote meaningful participation by underrepresented groups, including targeted outreach. Methods may include, but are not limited to, one or more of the following:

- Paid and free notices in the local media, especially those ethnically/culturally-based for the targeted group we are trying to reach. This effort includes print, electronic and social media.
- Translating notices into the native language of any group underrepresented.
- Posting the vacancy on Mountain Line's website and placing informational signs on Mountain Line buses and vans.
- Making presentations at existing meetings of civic, cultural, or human service organizations frequented by the underrepresented group.
- Outreach to civic, cultural, or human services organizations known to serve the underrepresented group informing them of the opportunity and need and enlisting their help.
- Notifying other public agencies of the vacancy and underrepresentation.
- Sending emails on the vacancy and underrepresentation to past attendees of Mountain Line public meetings and forums.

Section 8: Description of Sub-Recipient Monitoring

In accordance with 49 CFR 21.9(b), and to ensure that sub-recipients are complying with the DOT Title VI regulations, primary recipients must monitor their sub-recipients for compliance with the regulations. Importantly, if a sub-recipient is not in compliance with the Title VI requirements, then the primary recipient is not in compliance.

Mountain Line does not provide any federal funds to other recipients therefore has no sub-recipients and no sub-recipient monitoring policies.

Section 9: Title VI Equity Analysis for the Construction of a Facility

The recipient shall complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Facilities include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Facilities do not include bus shelters and transit stations, power substations, etc., as those are evaluated during project development of the NEPA process.

Mountain Line will complete a Title VI equity analysis for any new facilities meeting definitions above. There are many steps involved in the planning process prior to the actual construction of a facility. It is during these planning phases that attention needs to be paid to equity and non-discrimination through equity analysis. The Title VI Equity Analysis must be done before the selection of the preferred site.

For facilities covered by this provision, Mountain Line will:

- 1) Complete a Title VI equity analysis during the planning stage with regard to where an agency is located to ensure the location is selected without regard to race, color, or national origin, and engage in outreach to persons potentially impacted by siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
- 2) Give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure proper analysis of localized impacts.
- 3) Provide substantial legitimate justification for locating in a location that will result in a disparate impact on the basis of race, color, or national origin, and show that there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin.

Section 10: Title VI Training

Mountain Line provides various levels of internal training and requires additional external training for the Title VI Officer who serves as the Title VI Officer.

Operators: Operators in the field are trained annually by the Title VI Officer on requirements of Title VI and other civil rights statutes. Operators receive guidance on expectation that all customers are to be treated fairly and respectfully. Operators are also trained in reasons for refusal of service if necessary due to violation of riders' rules of conduct.

Managers and Supervisors: Managers and Supervisors of field operators receive the same training as operators plus training on taking complaints and routing to the Title VI Officer if required. Managers and Supervisors are trained to investigate all service refusals to ensure no customer is refused service other than for violation of riders' rules of conduct.

Fleet: Our fleet department receives the same training as operators.

Facilities: Our facilities department receives the same training as operators plus training regarding stop amenities and stop maintenance to ensure that all neighborhoods or routes receive the same quality of stops and maintenance.

Planning: Our planning department receives the same training as operators plus training on public participation process and need for analysis for recommending routes changes, stop additions or removal, connection center locations, and facilities planning.

Administration: Our administrative department receives same training as operators plus training on receiving and responding to complaints to ensure the public is aware of policies and procedures and to ensure complaints are routed to the Title VI Officer.

External training, to include Title VI training provided by ADOT and FTA, is required by Mountain Line at least every three to five years one or more of the following positions: CEO and General Manager, Deputy General Manager, Management Services Director, HR Manager, Capital Projects Manager, Trainers, Operations Director, Maintenance Manager, Clerk of the Board, Transit Planner, and Mobility Planner.

Section 11: Approval of Title VI Program by Governing Entity

The recipient must provide a copy of board meeting minutes, resolutions, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. The approval must occur prior to submission to the FTA.

II. Requirements of Transit Providers

Section 12: System-wide Service Standards

This requirement applies to all fixed route providers of public transportation service. Appendix C to 49 CFR part 21 provides in Section (3)(iii) that “no person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of service of transportation service furnished as a part of the project on the basis of race, color, or national origin. Frequency of service, age, and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color, or national origin.”

Service standards must include:

- *Vehicle load for each mode*
- *Vehicle headway for each mode*
- *On-time performance for each mode*
- *Service availability for each mode*

Section 13: System-wide Service Policies

FTA requires fixed route transit providers to develop a policy for each of the following service indicators. Transit providers may set policies for additional indicators as appropriate.

Policies must include:

- *Distribution of transit amenities for each mode*
- *Vehicle assignment for each mode*



System-Wide Service Standards and Policies

Mountain Line System-Wide Service Standards and Policies

1.0 Purpose:

As outlined in Title VI Circular 4702.1B and Environmental Justice Circular 4703.1, the Federal Transit Administration (FTA) requires that all fixed route transit providers establish and monitor a set of service standards and policies that can be used to measure system performance and ensure that transit services are being provided in a fair and equitable manner. The purpose of this document is to establish the new Title VI standards and policies that will be used by Mountain Line and submitted to the FTA as part of the triennial Title VI Program.

2.0 Scope:

These standards and policies apply to all Mountain Line transit services and passenger facilities.

3.0 Responsibilities:

General oversight for the following Title VI policies is performed by Mountain Line's Civil Rights Division in conjunction with the Management Services Director, and the Operations Director. These divisions are responsible for the ongoing implementation and execution of these policies.

4.0 Policy:

In accordance with FTA Title VI requirements, Mountain Line will regularly monitor the performance of the fixed route bus as related to the system-wide service standards for the following indicators. Monitoring is designed to ensure that minority and non-minority routes are being operated in a fair and equitable manner.

- Vehicle Load;
- Vehicle Headways;
- On-Time Performance; and
- Service Availability

Any significant service deficiencies identified through this process will be evaluated further to determine the extent to which minorities are affected. If the negative effect on minority persons is proportionally higher than the effect on non-minority persons, additional steps may be necessary to address the discrepancy.

Mountain Line shall also monitor its vehicle assignments and the distribution of transit amenities based on the policies outlined in this document to prevent discriminatory practices.

A. Route Categories

In order to develop appropriate standards for the different types of Mountain Line transit service, each route is classified as belonging to one of the two categories listed below. These classifications are used to identify service standards which are specific to each route category.

1. Core- Core bus routes provide high-frequency service with extended service spans to some of the busiest corridors in the community. The routes are generally longer and serve major trip generators such as universities, regional shopping malls, and high-density housing and employment areas.

2. Local- Local bus service usually operates on medium-length corridors and offers slightly lower levels of service. These routes will often serve smaller trip generators such as schools, hospitals, small shopping centers, and medium-density housing and employment sites.

B. System-wide Service Standards

The following sections outline the four primary service indicators that will be used to monitor Mountain Line bus lines and draw comparisons between minority and non-minority services.

The data used to compare route performance to these standards will be collected over a representative time period to ensure that they provide an accurate snapshot of each route. To ensure consistency, Mountain Line will use data from March, April, September, or October, which represent the busiest months of the year in terms of ridership. These months also serve as good comparison points because schools are in session and few major holidays are observed. Data collection time periods may also fluctuate based on data availability. Mountain Line defines weekday peak periods as 6:00 to 9:00AM and 3:00 to 6:00PM.

Vehicle Loads

The FTA Title VI Circular describes vehicle loads as follows:

Vehicle load can be expressed as the ratio of passengers to the total number of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. A vehicle load standard is generally expressed in terms of peak and off-peak times. Transit providers that operate multiple modes of transit must describe the specific vehicle load standards for peak and off-peak times for each mode of fixed route transit service (i.e., bus, express bus, bus rapid transit, light rail, heavy rail, commuter rail, passenger ferry, etc., as applicable), as the standard may differ by mode.

Mountain Line monitors load factor and capacity on all routes to ascertain overcrowding and to determine when additional service is necessary. The load factor for each route is calculated based on the average maximum load of each trip on a route during the peak weekday periods. As load factors are not typically a major influence on weekend service, no weekend load data is included.

The following table outlines the vehicle load factor standards, regardless of assignment to core or local route, which are based upon historical data, industry practices, and staff analyses. If a route exceeds its respective load factor standard, Mountain Line staff will review the service to determine if additional capacity should be provided.

Table 1 -Vehicle Load Factor Standards During Peak Operating Period

Vehicle Type	Average Passenger Capacities During Peak Operating Period			
	Seated	Standing	Total	Maximum Load Factor
35' Bus	28	13	41	1.5
60' Bus	51	41	91	1.8

Vehicle Headways

The FTA Title VI Circular describes vehicle headways as follows:

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds to more frequent service. Vehicle headways are measured in minutes (e.g., every 15 minutes); service frequency is measured in vehicles per hour (e.g., 4 buses per hour). Headways and frequency of service are general indications of the level of service provided along a route. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination. A vehicle headway standard is generally expressed for peak and off-peak service as an increment of time (e.g., peak: every 15 minutes; and off peak: every 30 minutes). Transit providers may set different vehicle headway standards for different modes of transit service. A vehicle headway standard might establish a minimum frequency of service by area based on population density. For example, service at 15- minute peak headways and 30-minute off-peak headways might be the standard for routes serving the most densely populated portions of the service area, whereas 30-minute peak headways and 45-minute off-peak headways might be the standard in less densely populated areas. Headway standards are also typically related to vehicle load. For example, a service standard might state that vehicle headways will be improved first on routes that exceed the load factor standard or on routes with the highest load factors.

Vehicle headways are largely determined by ridership demand and vary widely by route, time, and day. Based on changes in ridership levels, headways may be adjusted as identified in the Five-Year Transit Plan schedule change process by agency staff.

Table 2 -Vehicle Headway Standards

Category	Peak	Off-Peak
Core	30	60
Local	60	60

Mountain Line calculates headways as the average length of time between the scheduled arrival times of subsequent vehicles on a specific route. The preceding table outlines the vehicle headway standards by route category and time of day. These standards represent typical headways for each route category; however, many routes operate with more frequent service based on ridership demand.

On-Time Performance

The FTA Title VI Circular describes on-time performance as follows:

On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered to be "on time". For example, a transit provider may consider it acceptable if a vehicle completes a scheduled run between zero and five minutes late in comparison to the established schedule. On-time performance can be measured against route origins and destinations only, or against origins and destinations as well as specified time points along the route. Some transit providers set an on-time performance standard that prohibits vehicles from running early (i.e., ahead of schedule) while others allow vehicles to run early within a specified window of time (e.g., up to five minutes ahead of schedule). An acceptable level of performance must be defined (expressed as a percentage). The percentage of runs completed system-wide or on a particular route or line within the standard must be calculated and measured against the level of performance for the system. For example, a transit provider might define on-time performance as 95 percent of all runs system-wide or on a particular route or line completed within the allowed "on time" window.

Mountain Line regularly monitors on-time performance to increase service reliability and determine if running time changes are needed. As part of the annual schedule update process and Five-Year Transit Plan updates, each route's on-time performance is reviewed. If the standards below are not met, Mountain Line evaluates options to meet these standards, including but not limited to capital improvements such as transit signal priority, queue jumps, and bus only lanes as warranted by changing traffic conditions, operator training, timepoint adjustments to better reflect arrival times, run times of each route, adding buses to a route, and route changes.

Mountain Line has previously established an on-time performance goal of 95 percent for all modes. For bus routes, "on time" is defined as arriving at the scheduled arrival time to three minutes after the scheduled arrival time. This 95 percent goal continues to apply as the weekday on-time performance standard for both route categories.

Table 3 -On-Time Performance Standards

Category	On-Time Perf
Core	95.0%
Local	95.0%

Service Availability

The FTA Title VI Circular describes service availability as follows:

Service availability is a general measure of the distribution of routes within a transit provider's service area. For example, a transit provider might set a service standard to distribute routes such that a specified percentage of all residents in the service area are within a one-quarter mile walk of bus service or a one-half mile walk of rail service. A standard might also indicate the maximum distance between stops or stations. These measures related to coverage and stop/station distances might also vary by population density. For example, in more densely populated areas, the standard for bus stop distance might be a shorter distance than it would be in less densely populated areas, and the percentage of the total population within a one-quarter mile walk of routes or lines might be higher in more densely populated areas than it would be in less densely populated areas. Commuter rail service or passenger ferry service availability standards might include a threshold of residents within a certain driving distance as well as within walking distance of the stations or access to the terminal.

The Mountain Line approach to service availability is shaped largely by the Mountain Line Five-Year Transit Plan. This plan uses a market-based approach in determining when and where transit service will be operated. More specifically, it provides a framework for the efficient and effective expenditure of transit funds, and for realizing the highest return on investment in terms of public good and ridership productivity. Therefore, instead of requiring Mountain Line to make service available to a larger geographic region, these guidelines enable Mountain Line to provide frequent, high-quality service to the areas with the highest ridership demand. This approach has proven to be particularly effective at fulfilling the transit needs of Flagstaff's minority and low income populations.

Table 4- Service Availability Standards

Category	Stop Spacing (mi)
Core	0.25
Local	0.25

Although Mountain Line utilizes this ridership-based approach to service availability, the agency has developed stop-spacing standards for each of the route categories. These standards are based on the current average distance between stops for all of the routes for each category. Distances between individual stops vary significantly based on nearby land uses, development densities, geographic characteristics, ridership demand and other local conditions.

C. System-wide Service Policies

These policies are intended to provide guidance and instruction to ensure that vehicle assignment and passenger amenity distribution practices do not result in discrimination on the basis of race, color, or national origin.

Vehicle Assignment

The FTA Title VI Circular describes vehicle assignment as follows:

Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system. Policies for vehicle assignment may be based on the age of the vehicle, where age would be a proxy for condition. For example, a transit provider could set a policy to assign vehicles to depots so that the age of the vehicles at each depot does not exceed the system-wide average. The policy could also be based on the type of vehicle. For example, a transit provider may set a policy to assign vehicles with more capacity to routes with higher ridership and/or during peak periods. The policy could also be based on the type of service offered. For example, a transit provider may set a policy to assign specific types of vehicles to express or commuter service. Transit providers deploying vehicles equipped with technology designed to reduce emissions could choose to set a policy for how these vehicles will be deployed throughout the service area.

The Mountain Line bus fleet includes over 25 active vehicles and is made up of 2 vehicle types: 35-foot electric-diesel hybrid buses and 60-foot articulated electric-diesel hybrid buses.

Mountain Line maintains extremely high safety standards and closely monitors the age and condition of its vehicles to determine when new buses are needed and to guarantee that buses are equitably distributed and used on routes. Mountain Line has a fully hybrid system, reducing noise and pollution impacts across the entire system. Each bus is outfitted with equivalent rider amenities so there is no disparity between buses. Mountain Line operates only one depot and buses are not assigned to regular routes but are distributed across the system differently day to day.

The use of the 60' articulated buses versus 35' buses is determined by examining ridership on a regular basis. The larger buses are assigned to higher ridership routes and runs.

Transit Amenities

The FTA Title VI Circular describes transit amenities as follows:

Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Fixed route transit providers must set a policy to ensure equitable distribution of transit amenities across the system. Transit providers may have different policies for the different modes of service that they provide. Policies in this area address how these amenities are distributed within a transit system, and the manner of their distribution determines whether transit users have equal access to these amenities. This... is not intended to impact funding decisions for transit amenities. Rather, this applies after a transit provider has decided to fund

an amenity.

Mountain Line provides a wide array of transit amenities which include but are not limited to bus shelters, benches, trash cans, lighting, and posted stop-specific schedule information. Regardless of the bus stop type, all bus stops will include, at a minimum, a bus stop sign and a landing pad.

General policies for the distribution of bus stop amenities are outlined below. Mountain Line staff monitors the locations of all transit amenities to ensure that they are equitably distributed to minority and low income areas.

Mountain Line uses a point system to determine which type of bus stop is appropriate at a particular location. The point system includes the following criteria: projected ridership, land use density, proximity to Title VI populations, within an activity center, proximity to community spaces and cultural centers, along the Permanent Transit Network, and exposure to elements. The total point value aids staff with decision making on what type of amenities should be included at each stop though factors such as availability of right of way and available partnerships may also impact decisions.

The following table shows the four different bus stop types, the context in which they are considered, and the level of amenities.

Type	Context	Level of Amenities
Type I	<ul style="list-style-type: none">• Low ridership• Serves rural and suburban areas	Low
Type II	<ul style="list-style-type: none">• Medium ridership• Serves suburban areas	Medium
Type III	<ul style="list-style-type: none">• High ridership• Urban/suburban areas (especially locations with high density developments)• Near activity centers• Along PTN	High
Type IV	<ul style="list-style-type: none">• Very high ridership• Urban areas (especially locations with high density developments)• Near activity centers• Along PTN	Very High

The following table includes all of the amenities considered and which bus stop type they are either required, recommended, optional, or not recommended. This table represents Mountain Line’s preferences for implementing amenities, however, certain factors such as right-of-way limitations, partnerships and community interests will also be taken into consideration when determining the type of bus stop that should be implemented.

Amenity	Type I	Type II	Type III	Type IV
Landing Pad				
Connection to Adjacent Sidewalk				
Bus Stop Sign				
Logo Stop*				
Route Map/Schedule				
Shelter				
Custom Shelter				
Trash Receptacle				
Bike Racks				
Secured Bike Parking				
Scooter and Bikeshare Parking Zones				
Off-Board Fare Collection				
Real-Time Arrival Signs				
Wayfinding Signage				
TNC Pick Up/Drop Off Zones				

	Required: The bus stop must incorporate the amenity into the stop.
	Required if right-of-way is constrained: The bus stop must incorporate the amenity into the stop when right-of-way is constrained for a shelter.
	Recommended: The amenity is preferable at the bus stop but is not required.
	Optional: The amenity may be incorporated into the bus stop design on a case-by-case basis.
	Not Recommended: The amenity should not be placed at the bus stop.

5.0 Definitions:

Environmental Justice: The overarching objective of environmental justice is a fair distribution of the benefits or burdens associated with Federal programs, policies, and activities.

Low-income Population: Refers to any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy, or activity.

Minority Population: Means a readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity.

Title VI: Title VI of the Civil Rights Act of 1964 provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participating in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

6.0 Summary of Changes:

This 2021-2024 Plan has updated this section to be aligned with our most recent 5-Year Plan, new vehicle types and adoption of the Transit Guidelines which further defines policy for bus stop amenities.



Exhibits

Public Participation Plan



Adopted by MetroPlan Executive
Board on November 2, 2023

Public Participation Plan

Flagstaff Metropolitan Planning
Organization, dba MetroPlan
3773 N Kaspar Dr.
Flagstaff, AZ 86004

Members

City of Flagstaff
Coconino County
Northern Arizona Intergovernmental Public Transit
Agency (NAIPTA) – dba Mountain Line
Arizona Department of Transportation (ADOT)
Northern Arizona University (NAU)

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En español:

Para más información, a esta interesado en participar en el planeamiento del proceso de transporte en su comunidad y necesita asistencia con idioma, por favor comuníquese:

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kate.morley@metroplanflg.org

Señor David Wessel

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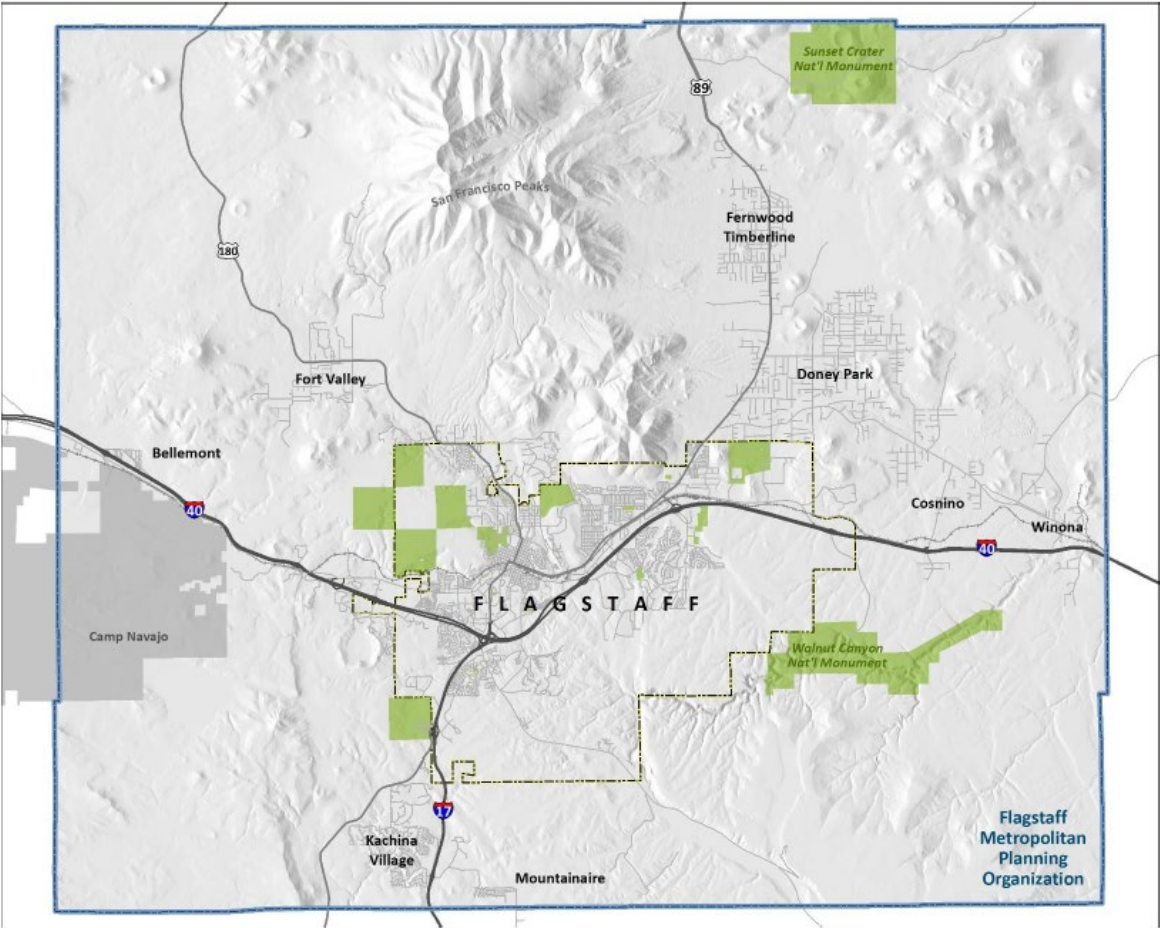
Teléfono: 928/699-3053

Flagstaff Metropolitan Planning Organization (MetroPlan) Public Participation Plan

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MetroPlan Planning Boundary



Flagstaff Metropolitan Planning Organization Public Participation

Introduction

This document guides the public involvement activities conducted by the Flagstaff Metropolitan Planning Organization (MetroPlan). The purpose of public participation is to ensure a proactive process affording the opportunity for the public to be involved in all phases of the multi-modal transportation planning process by providing complete information, timely public notice, sufficient periods for comment, full access to key decision points, and early and continuing engagement in developing transportation plans and programs. MetroPlan encourages active public participation in identifying and commenting on transportation issues, programs, and projects at every stage of the planning process.

Commencing with the Transportation Equity Act of the 21st Century (TEA-21), the need for public participation in all stages of the transportation planning process was emphasized by requiring metropolitan planning organizations (MPOs) to “include provisions to ensure early and continuing involvement of the public in the development of plans and Transportation Improvement Programs (TIPs).” The successor, Safe Accountable Flexible Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), continues the tradition of public participation. Interested parties might include, but not be limited to: *citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, and representatives of the disabled*, as noted in Title 23 United States Code (USC), Section 134 I (5).

Background

The United States Congress created the requirement for establishing Metropolitan Planning Organizations. MetroPlan was established in 1996 with responsibility for transportation planning within the regional area generally surrounding Flagstaff, Arizona, and the state highway system within its boundaries. Federal regulations require that an MPO be designated to carry out a comprehensive, continuing, and coordinated transportation planning process for urbanized areas with a population of 50,000 or more. MetroPlan The region covered by MetroPlan is nearly 525 square miles and is shown on the preceding map.

Executive Board and Technical Advisory Committee

The Executive Board and TAC meetings shall be held in conformance with the Arizona Open Meetings Law (A.R.S. Sec. 38-431, et seq.). The meeting agenda will be prepared and then posted at the following locations: MetroPlan office and website (www.metroplanflg.org)

Agendas include MetroPlan's [Non-Discrimination Policy and](#) Federal Transit Administration (FTA) public notice: *"The Transportation Improvement Program (TIP) includes the Northern Arizona Intergovernmental Public Transportation Authority (NAIPTA) final program of projects for Sections 5307 and 5339 funding under the Federal Transit Administration unless amended. Public notice for the TIP also satisfies FTA public notice requirements for the final program of projects. The MetroPlan Public Participation Plan (PPP) provides public participation notices and processes for NAIPTA as required to meet federal and state requirements for public participation and open meetings."*

Meeting agendas will be forwarded in advance to member agencies (ADOT, City of Flagstaff, Coconino County, Mountain Line, NAU). Documentation to support the posting will be retained by the MetroPlan administrative assistant for three years after the fiscal year of posting. An advanced list of the upcoming year's regularly scheduled meetings will be posted on MetroPlan's website annually.

Citizens, elected officials, and staff will have the opportunity to speak on transportation issues at every regular meeting during the call to the public and/or as each agenda item is considered.

Regular meetings of the Executive Board and TAC will be recorded, and minutes drafted. Minutes will be available for public review upon request and available on the MetroPlan website at www.metroplanflg.org.

Governance Structure

The MetroPlan Executive Board is the forum for cooperative decision-making on transportation-related matters. This seven-member board is comprised of principal elected officials from local government, a representative from the Arizona State Transportation Board, and a representative from the Mountain Line Board of Directors.

The Executive Board provides policy guidance and direction for the metropolitan transportation planning process.

The Technical Advisory Committee (TAC) is an advisory committee to the Executive Board. The 9-member committee is comprised of technical staff from the member agencies, as well as representatives from the Arizona Department of Transportation's

Flagstaff District Engineering Office and Transportation Planning Division. In addition, there is an ex-officio non-voting member from Northern Arizona University.

MetroPlan Technical Advisory Committee Representation

Staff members of the City of Flagstaff appointed by the Flagstaff City Manager	3 voting staff
Staff members of Coconino County appointed by the Coconino County Manager	2 voting staff
Staff members of ADOT appointed by the District Engineer	2 voting staff
Staff member of NAU appointed by the President's office	1 voting staff
Staff member of Mountain Line appointed by the Mountain Line CEO	1 voting staff
Staff member of FHWA	1 non-voting staff

MetroPlan Executive Board Representation

City of Flagstaff	3 voting
Coconino County	2 voting
Az State Transportation Board	1 voting
Mountain Line	1 voting

Environmental Justice Activity

Title VI of the Civil Rights Act of 1964 requires outreach to underserved groups.

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

A further 1994 Presidential directive dictates, "Each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."

Executive Order 12898

Groups impacted: low-income and minority populations, which may include sub-groups of elderly and disabled.

MetroPlan will make every effort to hold public meetings in facilities that are compliant with the Americans with Disabilities Act (ADA) and arrange for reasonable accessibility and accommodation to persons with disabilities. Further, to provide equally effective communication, MetroPlan will make preparations, when appropriate, for persons requiring assistance, such as the hearing or visually impaired, upon request.

MetroPlan will assist persons with limited English proficiency to participate in the transportation planning process. Staff will make every effort to provide Spanish translators and document translation, where feasible, upon request. Elderly persons or zero-vehicle households who are not able to attend meetings may make a request for the information at MetroPlan offices for delivery of materials to their homes. MetroPlan staff, coordinating availability, is willing to go speak to groups in an effort to eliminate participation barriers and involve citizens in the transportation process.

Current federal financial assistance for MetroPlan is provided by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) via an annual transportation planning allocation. No lawsuits or complaints alleging discrimination on the basis of race, color, or national origin have been filed regarding MetroPlan.

MetroPlan Title VI Non-discrimination Policy Statement

The Flagstaff Metropolitan Planning Organization (MetroPlan) ensures nondiscrimination compliance on the grounds of race, color, national origin, age, sex/ gender, gender identity or expression, sexual orientation, ability, limited English proficiency, or low-income status as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Section 504 of the Rehabilitation Act of 1973, Executive Order 12898 (Environmental Justice), Executive Order 13166 (Limited English Proficiency), Code of Federal Regulations 49 part 21, Code of Federal Regulations 23 part 200, and Code of Federal Regulations 49 part 303.

No person will be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any MetroPlan program or activity. Every reasonable effort will be made to ensure nondiscrimination in all MetroPlan's programs and activities, whether those programs and activities are federally funded or not. MetroPlan's contractors must all comply with this policy.

MetroPlan program areas will work together to implement their mutual Title VI nondiscrimination responsibilities in all programs. Therefore, each MetroPlan program area will take responsibility for preventing discrimination and ensuring nondiscrimination compliance in MetroPlan programs and activities.

Public Involvement Tools, Techniques, and Activities

MetroPlan will utilize a variety of tools to educate and inform the public, which may include the interweaving of **visualization techniques** such as, but not limited to:

Maps	Flow Charts
Drawings and Graphics	Illustrations
Tables and charts	PowerPoint Presentation
Sketches	Diagrams
Video	Photographs
Artist Renderings	Images/Auto Shapes
Demonstration Projects	Callouts/Word Art
Geographic Information Systems (GIS)	Narrative Description

The use of these individual techniques, or a combination thereof, will assist in the communication process.

Master Distribution List

MetroPlan continues to build our distribution list, which is made consists of government officials, staff, and community members who are interested in keeping up on plans, projects, and educational programs. The list is used to inform groups with project updates, calls for action, and invites to participate in public outreach events and surveys. An email sign-up is available on MetroPlan’s website and presented at public events.

Project-Specific Outreach Techniques

Beyond MetroPlan’s standard and continuous outreach, specific projects may require additional activities to reach targeted audiences and provide early input opportunities and education.

To incentivize the community to attend and make outreach events equitability accessible, MetroPlan offers translation services upon request, and locations and times that are reachable by public transportation. MetroPlan may provide food. Other important considerations affecting the participation of different groups include reaching people within their own communities and during existing meeting schedules, focusing presentations to special interests of specific groups, and placement of announcements and flyers using different types of media. Project-specific outreach techniques reflect the input received from the public on MetroPlan’s outreach method effectiveness.

MetroPlan Website

MetroPlan has developed and regularly updated the organization's website to provide the most current information available for download on various topics. The website contents are expected to include the following:

- ☑ Contact information
- ☑ Current Executive Board and Technical Advisory Committee information
- ☑ Meeting calendars and agendas
- ☑ Press releases
- ☑ Current and past plans, projects, and resources
- ☑ Partner project information links
- ☑ Federally required documents
- ☑ Work products and publications
- ☑ Links to related agencies
- ☑ Email sign-up for regular communications
- ☑ Job opportunities and Requests for Proposals



Media Contact and Advertising

The media play a crucial role in getting information regarding significant transportation activities and issues to the public. MetroPlan will maintain ongoing communication with the media through various means, including press releases and interviews.

The Arizona Daily Sun will be utilized as the primary print medium for advertising transportation issues of interest to the general population. Public service announcements and interviews may be broadcast on local radio stations.

MetroPlan social media accounts provide ongoing communications and are used for a variety of public outreach, education and encouragement campaigns, project updates, and invites to participate in the planning process through surveys, open houses, workshops, and events.

Public Meetings and Workshops

Meetings and workshops are used to both inform the public of the planning process and solicit input, ideas, and feedback. The MetroPlan Executive Board and Technical Advisory Committee meetings each include time on the agenda for general public comment on transportation-related items.

In-person and virtual meetings may include informal presentations at regional sites, open houses, round tables, or other community forums, and formal presentations to various service clubs, civic, and professional groups.

MetroPlan uses a variety of non-traditional meeting types described below in an effort to provide opportunities to the community outside of the traditional public meeting format.

- *Open Houses* - This format offers the public the opportunity to come at any time they choose during open house hours, interact with a variety, and take the time they need to learn about specific issues that relate to their concerns. Open houses can also include interactive activities, such as voting on preferred project alternatives.
- *Pop-Up Booths* are an informal type of public meeting that brings an open house feel to the community. Pop-up booths are placed at well-attended community events to give the public a chance to learn and provide input in a quick and personal way.

Surveys

Not everyone has time to attend public meetings, or stop at a pop-up booth during their daily activities. To ensure MetroPlan reaches visitors, residents, commuters, second homeowners, and underrepresented community members, MetroPlan uses surveys. Surveys may be online or hard copy. They may be provided at events and meetings, hosted online, and in some cases are brought to the community through the Flagstaff Library and community centers, particularly for non-English speaking and underrepresented community members. Additionally, depending on the type of project, MetroPlan uses in-person intercept surveys to gather information about users of the Flagstaff transportation system. These survey methodologies help MetroPlan understand the travel behavior and decision-making process of transportation users throughout the region.

Annual Review of Key Performance Measures

MetroPlan, with the Technical Advisory Committee and Executive Board, developed a set of goals, objectives, and key performance measures (KPIs) as they relate to planning, federal funding, and public and stakeholder participation. MetroPlan will annually evaluate these KPIs to ensure communications are far-reaching and that the results from outreach efforts are representative of the region's demographic makeup. The goals, objectives, and KPIs will be revisited annually, and adjustments may be made. (Appendix B)

Public Comment and Response to Comments

Written comments received through the public involvement process will be included along with responses as an appendix to the document under review, as appropriate, or will otherwise be summarized and presented to the board or other body for awareness purposes.

For MetroPlan's Work Products, the scope, depth, and duration of public involvement will vary depending on the MetroPlan work product (document). The following section identifies the MPO's minimum input, review, and comment opportunities that will be offered before adoption.



Work Program Tasks

MetroPlan produces two major documents, the Regional Transportation Plan (RTP) and the Transportation Improvement Program (TIP). These two plans directly lead to the implementation of projects in the Flagstaff Region. Other MetroPlan documents, such as the Public Participation Plan, Overall Work Program, and modal plans inform the RTP and TIP and identify priorities. Public input is a vital component of each of these documents, and ultimately results in needed improvements to Flagstaff's transportation system.

Regional Transportation Plan (RTP)

The Regional Transportation Plan, also known as the RTP, is a comprehensive plan of the transportation system that covers, at the minimum, a 20-year planning horizon. Federal law requires that major updates occur at least every five years after it is adopted. A specific RTP process will be developed for each major update. All major updates to the RTP follow the same basic process as follows:

- During the early stages of plan development, at least two formal public meetings (a.k.a. workshops) will be hosted to involve interested parties.
- Stakeholders will be identified and engaged early in the process.
- Efforts to engage and inform the general public of the process and process results will include media outreach, website information, and potentially other methods.
- Continuing engagement during the development of the plan will occur in stages for the public and elected/appointed officials.
- The Draft RTP will be presented to the MetroPlan Technical Advisory Committee and Executive Board for review and comment before the public comment period.
- The comment period on the draft RTP will last for 30 days; copies of the plan will be placed in accessible facilities, and locations will be published in the primary newspaper.
- Comments will be collected and responses provided, as appropriate.
- The Final Draft RTP, comment, and response will be presented to the MetroPlan Technical Advisory Committee for review prior to the Executive Board recommendation.
- All written and appropriate public comments received will be made part of the final document.
- The Final RTP will be presented to the MetroPlan Executive Board for adoption.

Metropolitan Transportation Improvement Program (MTIP)

The Metropolitan Transportation Improvement Program is a short-term listing of projects expected to be in the immediate future. The Transportation Improvement Program (TIP) includes the Northern Arizona Intergovernmental Public Transportation Authority's final program of projects and funding under the Federal Transit Administration (FTA) unless amended. Public notice procedures for the TIP also satisfy FTA public notice requirements for the final program of projects (POP). The MTIP is updated at least every two years based on the following process:

- MetroPlan will announce a call for projects 30 days before the Technical Advisory Committee review.
- MetroPlan staff, in conjunction with the Technical Advisory Committee, will prepare a Draft MTIP, which will be recommended to the Executive Board for public review.

- The public review period on the MTIP will last 30 days
- Comments will be collected, and responses will be provided.
- The Final Draft MTIP, comment, and response will be presented to the MetroPlan Technical Advisory Committee prior to the Executive Board recommendation
- An ad giving notice will be placed in the local paper of record and state that the MetroPlan TIP process satisfies the NAIPTA program of projects notice process
- The Final MTIP will be presented to the MetroPlan Executive Board for adoption
- An ad giving notice will be placed in the local paper of record and state that the MetroPlan TIP process satisfies the NAIPTA program of projects (POP) notice process
- Amendments and Administrative Modifications
 - Changes meeting the ADOT prescribed criteria for amendments will be advertised and posted per MetroPlan's regular meeting procedures. Amendments will be reviewed by the TAC which will make a recommendation to the Executive Board for final action.
 - A TIP/STIP requires formal amendments when one or more of the following criteria are met:
 - Change to a federally funded project or source of federal funds.
 - Additions or deletions of projects which will require air quality analysis.
 - Major change in the project description, limits, scope, or project phase.
 - Change in project schedule over one year.
 - The change results in a cost increase of greater than 25 percent.
 - Adding a new federally funded project (in attainment areas).
 - Please see ADOT's MPO and COG procedures manual, chapter 8, for more complete explanations.
 - ADOT, MPO, and COG Guidelines and Procedures Manual | Department of Transportation (azdot.gov)

Amendments to Adopted Documents

Amendments to the RTP and the MTIP are occasionally necessary after they have been adopted. With the exception of emergency or exempt projects, amendments will utilize the following process:

- MetroPlan will announce the proposed amendment via agenda posting
- Amendments will be reviewed by the TAC with a recommendation to the Executive Board for adoption
- Upon review by the Executive Board, the amendment will either be approved or denied

Public Participation Plan (PPP)

The Public Participation document will be updated as required based on the following process:

- MetroPlan staff, in conjunction with the Technical Advisory Committee, will prepare a draft PPP and/or related amendments.
- Draft PPP will be presented to Executive Board prior to public review
- The comment period on the updated PPP will last 45 days
- The MetroPlan Technical Advisory Committee shall review all written public comments and prepare responses prior to recommendation to the Executive Board for adoption

An explicit public involvement plan (PIP) will be developed for each task in the annual Unified Planning Work Program and budget. Each PIP will be tailored to the complexity and impact of the task on the public.

Amendments Exempt from the Public Participation Plan

Certain amendments to adopted documents will be exempt from the public involvement process:

- Emergency projects, necessary for the safety and welfare of the citizenry
- Minor revisions or technical amendments, such as:
 - Minor cost changes
 - Changes in cost shares between agencies
 - Splitting projects, minor changes in the project location
 - Typographical corrections
 - Other administrative changes include but are not limited to the lead agency, contingency, and funding source.

Appendix A: Summary Table of MetroPlan Public Participation Procedures and Tools

Summary of MetroPlan Public Participation Procedures and Tools

Public Participation Component	Meetings	Public Comment Period	Typical Public Participation Techniques	Additional Comment
Adopted Documents, Plans, and Programs				
Regional Transportation Plan (RTP)	Initial and subsequent public meetings TAC Executive Board	30 days	News Release Website Comment Forms	Update every 4 years. Comments received to be included in RTP
Metropolitan Transportation Improvement Program (MTIP)	TAC Executive Board	30 days	News Release Website Comment Forms	Update every 1-2 years. Public comments provided to Executive Board
Public Participation Plan (PPP)	TAC Executive Board	45 days	News Release Website Comment Forms	Updated as required Public comments provided to Executive Board
Amendments to adopted documents	TAC Executive Board	N/A	Website	Non-exempt amendments
Amendments Exempt from public participation	N/A	N/A	N/A	Emergency projects and minor revisions
Open Public Meetings				
Executive Board Meetings	Regularly scheduled meetings	N/A	Master distribution list Website	Public comments accepted at the meeting
TAC	Regularly scheduled meetings	N/A	Master distribution list Website	Public comments accepted at the meeting

Public Participation Component	Meetings	Public Comment Period	Typical Public Participation Techniques	Additional Comment
Outreach Components				
Title VI & Environmental Justice	TAC Executive Board	N/A	Mailings upon request News release Website Coordinate communications with local organizations and agencies.	Assist persons with limited English proficiency.
MetroPlan Website	N/A	N/A	Web address supplied with news releases, on business cards, and other web links	Maintained and updated regularly
Staff Presentations	Government, community groups, business, and professional groups	N/A	N/A	Upon request; subject to staff availability
News Release	N/A	N/A	Sent to news media	N/A

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