



TITLE VI AND ENVIRONMENTAL JUSTICE

Policy Manual

New Orleans Regional Transit Authority
2817 Canal Street
New Orleans, Louisiana
www.norta.com

Revised January 2023

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I. OBJECTIVES

The objectives of the Regional Transit Authority's (RTA's) Title VI Program are to:

- Ensure that the level and quality of transportation service is sufficient to provide equal access and mobility for any person without regard to race, color, or national origin.
- Identify and address, as appropriate, disproportionately high, and adverse human health, and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations.
- Promote full and fair participation of all affected populations in transportation decision making.
- To prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- Ensure access to programs and activities by persons with limited English proficiency (LEP).

II. AUTHORITIES

The objectives and the RTA's policy as detailed herein are compliant and consistent with:

- Title VI of the Civil Rights Act of 1964.
- Title 49, Chapter 53, Section 5332 of the United States Code of Federal regulations.
- Title 49 Part 21 of the US Code of Federal regulations.
- Federal Transit Administration's FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients.
- Executive Order 12898 and DOT Order 5610.2 on Environmental Justice.
- Executive Order 13166 and DOT Limited English Proficiency Guidance 70 FR 74087.

III. TITLE VI PLAN POLICY STATEMENT

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Title VI provides that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance from the U.S. Department of Transportation.

The RTA has established a Title VI Program in accordance with Title VI of the Civil Rights Act of 1964; 49 CFR Part 21; FTA Circular 4702.1B; related statutes and regulations to ensure compliance with Title VI, to the end that no person is excluded from participation in, or denied the benefits of services on the basis of race, color, or national origin.

The Chief Executive Officer, senior management, all supervisors, and employees share the responsibility for carrying out RTA's commitment to Title VI. The Title VI Coordinator is responsible for initiating and monitoring Title VI activities.

Contact Information:

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Lona Edwards Hankins
Chief Executive Officer
New Orleans Regional Transit Authority

Date: 3/29/2023

IV. DEFINITIONS

Adverse Effect means the totality of significant individual or cumulative human health or environmental effects, including interrelated social and economic effects; and the denial of, reduction in, or significant delay in the receipt of benefits of DOT programs, policies, or activities.

Discrimination refers to any act or inaction, whether intentional or unintentional, in any program or activity of a Federal aid recipient, sub-recipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.

Disparate Impact refers to facially neutral policies or practices that have the effect of disproportionately excluding or adversely affecting members of a group protected under Title VI, and the recipient's policy or practice lacks a substantial legitimate justification.

Disparate Treatment refers to actions that result in circumstances where similarly situated persons are treated differently (i.e., less favorably) than others because of their race, color, or national origin.

Disproportionately High and Adverse Effect on Minority and Low-income Populations means an adverse effect that: (1) is predominately borne by a minority population and/or a low-income population; or (2) will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population.

Environmental Justice (EJ) Protected Population means minority and low-income populations that are protected by Environmental Justice policy.

Limited English Proficient (LEP) Persons are persons for whom English is not their primary language and who have a limited ability to speak, understand, read, or write English. It includes people who reported to the U.S. Census that they do not speak English well or do not speak English at all.

Low-Income means a person whose median household income is at or below the United States Department of Health and Human Services' poverty guidelines.

Low-Income Population means any readily identifiable groups 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 DOT program, policy, or activity.

Low-Income Transit Route is one in which at least one-third of the revenue miles are located in a Census block or block group, or traffic analysis zone where the percentage low-income population is equal to or greater than the percentage low-income population in the service area.

Minority Transit Route is one in which at least one-third of the revenue miles are located in a Census block or block group, or traffic analysis zone where the percentage minority population is equal to or greater than the percentage minority population in the service area.

Minority Persons include American Indian and Alaska Native; Asian; Black or African American Populations; Hispanic or Latino Populations; and Native Hawaiian and Other Pacific Islander.

Minority Population means any 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.

Predominantly Minority Area means a geographic area, such as a neighborhood, Census tract, or traffic analysis zone, where the proportion of minority persons residing in that area exceeds the average proportion of minority persons in the recipient's service area.

Predominantly Low-Income Area means a geographic area, such as a neighborhood, Census tract, or traffic analysis zone, where the proportion of low-income persons residing in that area exceeds the average proportion of low-income persons in the recipient's service area.

V. NOTICE TO PUBLIC/TITLE VI COMPLAINT PROCESS

The RTA's notice to the public is posted at the A. Phillip Randolph Building located at 2817 Canal Street, the RTA web site, and placed on buses, streetcars, and ferry boats throughout the system.



www.norta.com | 504-248-3900

Title VI Federal Law

| KNOW YOUR RIGHTS | CONOZCA SUS DERECHOS | QUYỀN CỦA BẠN |
|---|--|---|
| <p>Federal law (Title VI of the Civil Rights Act of 1964) prohibits discrimination on the basis of race, color, or national origin in the programs and activities receiving Federal financial assistance. (42 USC Section 2000d).</p> <p>RTA does not discriminate on the basis of disability in the admission or access to, or in treatment, its services, programs, and activities.</p> <p>RTA is committed to practicing non-discrimination. If you believe you have been subjected to discrimination, you may file a complaint with the RTA Title VI Coordinator.</p> | <p>La ley federal (Título VI de la Ley de derechos civiles de 1964) prohíbe la discriminación con base a la raza, color u origen nacional en programas y actividades que reciban asistencia financiera a nivel federal. (42 USC Sección 2000d).</p> <p>RTA no discrimina con base a la discapacidad para la admisión o el acceso, o en el trato o empleo, en sus servicios, a sus programas y actividades.</p> <p>Para aquellos con conocimientos limitados del inglés, la RTA provee servicios de intérpretes.</p> <p>La RTA está comprometida con la práctica de no discriminación. Si Usted cree que ha sido sujeto a la discriminación, puede procesar una queja con el Coordinador del Título VI de la RTA.</p> | <p>Luật liên bang (Tiêu Đề VI của Đạo Luật Dân Quyền năm 1964) nghiêm cấm phân biệt đối xử trên cơ sở chủng tộc, màu da, hoặc nguồn gốc quốc gia trong các chương trình và hoạt động nhận hỗ trợ tài chính của Liên Bang. (42 Bộ Luật Hoa Kỳ Phần 2000d).</p> <p>RTA không phân biệt đối xử trên cơ sở tình trạng khuyết tật trong việc tiếp nhận hoặc tiếp cận đến, hoặc trong việc đối xử, đối với các dịch vụ, chương trình, và hoạt động của RTA.</p> <p>RTA cam kết thực hành không phân biệt đối xử. Nếu bạn tin rằng mình bị phân biệt đối xử, bạn có thể nộp khiếu nại với Điều Phối Viên Tiêu Đề VI của RTA.</p> |

For more Information, visit www.norta.com or contact RTA's Title VI Coordinator at 504-827-8377

Para más información, visite www.norta.com o consulte al Coordinador del Título VI de la RTA llamado al 504-827-8377.

Để biết thêm thông tin, vui lòng truy cập www.norta.com hoặc liên hệ Điều Phối Viên Tiêu Đề VI của RTA theo số 504-827-8377



VI. COMPLAINT REVIEW AND INVESTIGATION

All Title VI and related statute complaints are considered formal as there is no informal process for filing or investigating a Civil Rights grievance.

Eligibility

All complaints shall be investigated unless:

- The complaint is withdrawn;
- The complainant fails to provide required information after numerous requests;
- The complaint is not filed within the 180-day time frame of the incident or event;
- The basis of the complaint is not covered by Title VI and/or related statutes.

The complaint procedures apply to the users, beneficiaries, employees and participants of the RTA's programs, services, and activities. As such, any person who believes that they have been excluded from participation in, or has been denied benefits or services of any program or activity conducted by the RTA or by any contractor, consultant, or sub-recipient of the RTA on the basis of race, color, and national origin may bring forth a complaint of discrimination under Title VI and related statutes.

Complaint Basis

Allegations must be based on issues involving race, color, or national origin as defined below. Although complaints regarding Title VI are limited to race, color, or national origin, the RTA will not unlawfully exclude any persons based upon race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status or other protected classes.

| Protected Group Categories | | Definition |
|-----------------------------------|-----------------|--|
| | Race | An individual belonging to one of the accepted anthropological racial groups: or the perception based on physical characteristics that a person is a member of a racial group. |
| | Color | Color of skin including shade of skin within a racial group. |
| | National Origin | National birth site. Citizenship is not a factor. Discrimination based on language or a person's accent is covered by national origin. |

The Title VI Coordinator determines whether the agency has jurisdiction and whether or not the complaint has sufficient merit to warrant investigation. Written notice is sent to the complainant

within 10 calendar days, acknowledging receipt of the complaint and their rights under Title VI and related statutes.

If probable cause of a discriminatory practice is discovered, the Title VI Coordinator shall endeavor to eliminate said practice by means of a corrective action plan. The Corrective Action Plan will require approval by the RTA's Board of Commissioners and shall include:

- a list of all recommended corrective actions;
- a description of how the actions will be implemented; and
- a written assurance that the agency will implement the plan as approved by the Board of Commissioners.

The Title VI Complaint policy, process and related documents are provided in **Attachment 1**.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

Title VI Investigations, Lawsuits or Complaints

As of March 2023, the RTA is not currently involved in any Title VI investigations, lawsuits or complaints that pertain to allegations of discrimination on the basis of race, color, and/or national origin in transit related activities. The RTA has also not received any within the past three years prior to this submittal.

VII. MINORITY REPRESENTATION ON COMMITTEES AND COUNCILS

The RTA is committed to meeting the needs of all passengers and ensuring that no person is excluded from participation in or denied the benefits of its services. Efforts to encourage participation of minorities on various transit committees include appointment of Board members by the Mayor of New Orleans and the President of Jefferson Parish, selecting volunteers from special transit related interest groups and from representatives from the Metropolitan Planning Organization (MPO).

As well, the RTA strives to ensure that the composition of the other relevant commissions and committees reflects a representation of minority participation. The racial/ethnic composition of the RTA Board of Commissioner is detailed in the table below.

Table 1: Minority Representation on RTA Committees

| COMMISSION | WHITE | BLACK | HISPANIC | ASIAN |
|-----------------------------------|-------|-------|----------|-------|
| Regional Transit Authority | 2 | 5 | | |
| Executive Committee | 1 | 3 | | |
| Operations and Admin Committee | 2 | 2 | | |
| Finance Committee | 1 | 3 | | |

VIII. SUBRECIPIENTS

The RTA does not currently utilize any subrecipients within its Title VI and EJ Program. Because there are no subrecipients, there is no need for monitoring.

IX. LIMITED ENGLISH PROFICIENCY (LEP)

The RTA supports the goals of DOT for providing meaningful access to its services for persons with Limited English Proficiency (LEP). RTA is committed to ensuring compliance with Executive Order 13166 relative to LEP individuals and strives to provide effective, efficient, and equitable service to all citizens regardless of their ability to speak, read or write English. The LEP Plan is provided in **Attachment 2. LIMITED ENGLISH PROFICIENCY (LEP) ANALYSIS AND PLAN.**

X. ENVIRONMENTAL JUSTICE POLICY

The RTA's Environmental Justice (EJ) policy requires that the agency identify and address as appropriate, disproportionate high and adverse human health or environmental impacts of programs, policies and activities on low-income communities and communities of color.

Disproportionate high and adverse impact is defined as an adverse effect that:

- Is predominantly borne by a minority population and/or a low-income population; or
- Will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority and/or non-low-income population.

Moreover, an adverse effect is the totality of significant individual or cumulative effects to include human health, environmental, social, and economic effects as listed below.

Table 2: Adverse Effects Considered by RTA Environmental Justice Policy

| HUMAN HEALTH | ENVIRONMENTAL | SOCIAL | ECONOMIC |
|-----------------|-------------------------------|-----------------------------|-------------------------------|
| ▪ Physical Harm | ▪ Air, Noise, Water Pollution | ▪ Displacement of persons | ▪ Displacement of Businesses |
| ▪ Infirmity | ▪ Soil Contamination | ▪ Isolation or Exclusion | ▪ Employment Effects |
| ▪ Illness | ▪ Natural resource | ▪ Community Cohesion | ▪ Available Services |
| ▪ Death | ▪ Traffic Congestion | ▪ Separation from Community | ▪ Displacement of non-profits |

While not all inclusive, the above list represents the interrelated human, environmental, social, and economic affects that are factored in the RTA's EJ policy.

RTA methodology for conducting an EJ analysis (detailed below) involves socio-economic data collection and analysis, extensive public outreach and involvement, determination of comparative impacts and development of mitigation and/or enhancement measures as warranted.

Demographic Data Collection

The EJ Analysis initiates with an analysis of the demographic and socio-economic data for the planning or project impact area. Sources of data utilized in the EJ analysis include US Census and American Community Survey (ACS) data at the Census tract, Census Block or block group level as

appropriate. Census data on age, race, ethnicity, income, and poverty will be collected, along with US Census economic data. Moreover, RTA will also utilize food stamp recipient data from the Louisiana Department of Social Services to supplement Census data for appropriate identification of low-income populations. Other data sources will be utilized as warranted.

This data set will be mapped utilizing a Geographic Information System (GIS) software platform to provide a demographic profile of the EJ protected populations.

Notably, disproportionately high, and adverse effects, not population size, are the bases for environmental justice. As such, even a very small minority or low-income population may be disproportionately impacted by a proposed project. EJ determinations are based on effects of a proposed action, not population size.

Unit of Geographic Analysis

The unit of geographic analysis for an EJ analysis will be established on a project-by-project basis depending upon the proposed boundaries of the plan or project. For example, when considering the impacts of a new streetcar line, the affected area would include the entire alignment of the line, not just the areas adjacent to the construction activity. Conversely, when determining the geographic unit for construction of a maintenance facility, the area adjacent to the construction activity may be the only affected area. As such, the selection of the geographic unit of analysis will include a determination of the presence of minority and low-income populations within and in close proximity to the plan or project, as well as the identification of minority and low-income populations that use, or are dependent on the natural, cultural, social, and economic resources that could be affected by the proposed action.

Determination of Disproportionate Adverse Effects

In determining the potential for disproportionately high and adverse impacts, RTA will conduct a benefits and burdens analysis of the proposed project or plan. This analysis will consider the following factors:

- Whether a high or substantial impact exists which adversely affects an EJ population;
- Whether the effects on the EJ population exceeds those borne by non-EJ populations;
- Whether cumulative or indirect effects would adversely affect an EJ population;
- Whether mitigation and/or enhancement measures should be taken; and
- Whether there are off-setting benefits to EJ populations.

If it determined that the proposed project will have a disproportionate adverse effect, the RTA will then examine whether the project is in the best interest of the public, and whether or not there are alternatives that would have less severe effects. If the analysis concludes a compelling public need that cannot be satisfied by an alternative, the agency may proceed with the proposed project, even if disproportionate adverse effects have been identified.

National Environmental Policy Act (NEPA)

RTA's EJ principles will be incorporated in all NEPA reviews and environmental assessments for public works projects.

Filing an Environmental Justice Complaint

Any individual or community that wishes to file an environmental justice complaint or discuss concerns about the RTA's planning process may contact:

Louisiana Department of Transportation
Title VI Programs Manager
225-379-1361

XI. CIVIL RIGHTS AND TITLE VI STANDARD ASSURANCES

The Federal Transit Administration's Civil Rights Assurances was referenced in the Federal Fiscal Year 2022 Certifications and Assurances for Federal Transit Administration Assistance Programs. Refer to **Attachment 3: 3. CIVIL RIGHTS ASSURANCES**.

XII. SOCIAL EQUITY ANALYSIS

The RTA is committed to providing efficient, reliable, and equitable transit in its Greater New Orleans Service area. The agency is committed to using data, rider complaints and suggestions, in-person, and digital public engagement methodologies to ensure service changes limit unintended negative impacts on vulnerable communities.

Because reliable public transportation improves economic mobility the RTA is working to continuously improve transit route, efficiency, and service reliability to move riders to and from education and occupational opportunities.

In compliance with Title VI policy, the RTA has conducted a social equity analysis for all major service changes and all fare changes impacting minority and/or low-income transit routes in the system. The agency has also instituted the use of Government Alliance on Race and Equity's Race and Social Justice Toolkit to provide guidance when making policy and operational changes to ensure all relevant decisions and policies are grounded in equity.

Minority and Low-Income Transit Routes

The RTA's Title VI policy defines a Minority or Low-Income route as one in which at least one-third (1/3) of the revenue miles are located in Census block or block group, or traffic analysis zone where the percentage of minority or low-income population is equal to or greater than the percentage of minority or low-income population in the service area. Based on this definition, the Title VI policy requires we use certain thresholds to determine whether or not a line is a minority and/or a low-income transit route. Minority people are defined in the Title VI policy as racial or ethnic minority populations. The following is the methodology used to make this determination.

First, the demographics of the service area needed to be determined. The RTA operates routes in Orleans Parish and the City of Kenner.

Table 3: Minority, Hispanic/Latino, and Low-Income Populations in Service Area

| RTA Service Area 2021 Demographics | | | |
|--|---|--|--|
| Demographic Theme | Service Area Universe: Total Pop or HH | Demographic Theme Count in Service Area | Theme Percent for Threshold |
| Minority Population | 457,622 | 281,999 | 61.62% |
| Hispanic/Latino Population | | 38,529 | 8.42% |
| Population in Poverty | 443,932 | 100,809 | 22.71% |
| Families in Poverty | 88,498 | 14,436 | 16.31% |
| Household in Poverty | 178,710 | 40,453 | 22.64% |
| Average Median Household Income (2019 dollars) | | | \$46,192 |
| Service Area sums totals for Orleans Parish and the City of Kenner. | | | |
| Demographics from American Community Survey (ACS) 5-Year Estimates (2015 thru 2019). | | | |

The percentages in the above table serve as the thresholds used to determine whether or not a transit route is a minority and/or low-income one. The thresholds for “minority” and “Hispanic/Latino” are calculated separately because they are separate questions in the American Community Survey and Census. Therefore, survey and census respondents answer both questions so combining the two would result in the double counting of many people. Based on the above thresholds, most transit routes in the RTA system are either a Minority or Low-Income transit route.

Table 4: New Orleans and Kenner RTA Route Status – Minority or Low-Income Transit Routes

| Route Designations Based upon 1/4 mile buffer Demographics | | | | | | |
|--|-----------|------------|------------|------------|---------------------|---------------------|
| Route Name | RtePerMin | RtePerHisp | RtePerPOVP | RtePerPOVH | FlagMin | FlagHispLa |
| 1 Algiers Point Ferry | 8.12% | 12.80% | 6.53% | 6.15% | | Orl Hisp/Lat Rte |
| 103 Algiers Gretna | 71.31% | 4.88% | 21.83% | 22.56% | Orl Minority Rte | |
| 103 O Algiers Owl | 65.66% | 5.33% | 22.68% | 22.90% | | |
| 105 Algiers Local | 85.37% | 6.09% | 29.94% | 33.09% | Orl Minority Rte | Orl Hisp/Lat Rte |
| 11 Magazine | 25.35% | 6.33% | 14.75% | 12.10% | | Orl Hisp/Lat Rte |
| 114 A Garden Oaks Kabel | 74.99% | 7.06% | 31.03% | 32.03% | Orl Minority Rte | Orl Hisp/Lat Rte |
| 114 B Garden Oaks Tullis | 75.47% | 6.85% | 28.51% | 28.77% | Orl Minority Rte | Orl Hisp/Lat Rte |
| 12 St. Charles Streetcar | 28.61% | 9.16% | 15.23% | 13.95% | | Orl Hisp/Lat Rte |
| 15 Freret | 54.89% | 8.26% | 30.87% | 32.37% | | Orl Hisp/Lat Rte |
| 16 MLK Claiborne | 56.35% | 7.30% | 28.98% | 30.91% | | Orl Hisp/Lat Rte |
| 17 MLK Hollygrove | 80.74% | 5.50% | 38.02% | 37.89% | Orl Minority Rte | Orl Hisp/Lat Rte |
| 201 Kenner Local | 41.91% | 29.64% | 21.57% | 19.05% | Kenner Minority Rte | Kenner Hisp/Lat Rte |
| 27 Louisiana | 64.57% | 5.61% | 27.29% | 27.32% | | Orl Hisp/Lat Rte |
| 3 Riverfront | 32.22% | 4.71% | 24.02% | 21.55% | | |
| 39 Tulane | 67.54% | 7.39% | 28.31% | 29.48% | Orl Minority Rte | Orl Hisp/Lat Rte |
| 4 Chalmette Ferry | 99.59% | 4.61% | 8.13% | 15.84% | Orl Minority Rte | |
| 47 O Canal Owl Shuttle | 34.98% | 11.59% | 18.63% | 16.94% | | Orl Hisp/Lat Rte |
| 49 Rampart Streetcar | 41.26% | 6.20% | 27.09% | 24.08% | | Orl Hisp/Lat Rte |
| 52 A St. Bernard | 73.68% | 5.22% | 34.16% | 32.72% | Orl Minority Rte | |
| 52 B St Bernard | 74.49% | 4.84% | 29.87% | 29.57% | Orl Minority Rte | |
| 55 Elysian Fields | 70.42% | 5.05% | 25.27% | 23.71% | Orl Minority Rte | |
| 57 Franklin | 76.94% | 4.43% | 27.67% | 27.42% | Orl Minority Rte | |
| 61 Lake Forest | 86.81% | 5.68% | 30.78% | 31.20% | Orl Minority Rte | Orl Hisp/Lat Rte |
| 62 Morrison | 87.52% | 2.52% | 32.16% | 31.27% | Orl Minority Rte | |
| 62o Morrison Owl | 89.16% | 2.31% | 31.36% | 31.20% | Orl Minority Rte | |
| 66 Hayne Loop | 96.49% | 1.64% | 29.24% | 30.23% | Orl Minority Rte | |
| 68 Little Woods Loop | 97.21% | 1.36% | 27.68% | 31.37% | Orl Minority Rte | |
| 73 Michoud Loop | 97.46% | 7.10% | 19.75% | 24.65% | Orl Minority Rte | Orl Hisp/Lat Rte |
| 80 Desire-Louisa | 76.27% | 5.24% | 35.59% | 33.88% | Orl Minority Rte | |
| 84 Galvez | 81.15% | 4.53% | 37.90% | 37.38% | Orl Minority Rte | |
| 86 Barracks-Chalmette | 88.40% | 0.56% | 37.49% | 35.94% | Orl Minority Rte | |
| 88 St Claude | 50.11% | 5.84% | 25.70% | 22.51% | | Orl Hisp/Lat Rte |
| 91 Jackson Esplanade | 42.52% | 7.47% | 23.23% | 21.56% | | Orl Hisp/Lat Rte |
| 94 Broad | 69.61% | 4.61% | 23.31% | 23.15% | Orl Minority Rte | |
| 96 Carrollton Gentilly | 57.36% | 5.56% | 22.46% | 22.32% | | Orl Hisp/Lat Rte |
| 47 A Canal Streetcar - Cemeteries | 41.35% | 13.50% | 22.18% | 18.92% | | Orl Hisp/Lat Rte |
| 47 B Canal Streetcar - City Park | 37.94% | 11.09% | 19.50% | 18.48% | | Orl Hisp/Lat Rte |

Source: US Census Bureau, American Community Survey 5-Year Estimates, 2021.

Major Service Change Thresholds

Title VI prohibits intentional discrimination, as well as actions that result in unintentional discrimination or disproportionate adverse impacts to communities of color and low-income communities. As such, to ensure that changes to services and fares are equitable the RTA will conduct a Service and Fare Equity Analysis for all Major Service Changes, where a major service change meets the following threshold:

- Any change of more than 25% of the revenue hours or route miles on a given transit route (bus or streetcar) or a branch of a route for an individual day (weekday, Saturday, or Sunday) measured as happening at one time or within a single year. Route Branch is defined as one of the two or more route segments served by a single route.
- Any change to the span of service on a given transit route (bus or streetcar) of 2 hours or more for an individual day (weekday, Saturday, or Sunday). A span of service is defined as the time from the start of the first trip to the start of the last trip on a given route.
- The introduction of any new transit route (bus or streetcar) with the exception of supplemental services designed to reduce potential overcrowding on regular (scheduled) transit routes.
- The discontinuation of a route or portion of a route with no alternative service within ¼ mile.

For all routes with proposed changes that meet the major service change threshold, RTA will conduct a social equity analysis to:

- 1) Determine the benefits to and potential negative impacts on minority and low-income populations;
- 2) Quantify expected effects (positive or negative); and
- 3) Determine the appropriate course of action to prevent, minimize or mitigate the impacts as warranted.

To determine whether a disparate impact exists as the result of a proposed major service change, RTA will compare existing service to proposed service, and calculate the absolute change as well as the percent of change in travel time. If it is determined that the increase in travel time from the proposed service change is more than 15 minutes for any minority or low-income transit route, then the change will be deemed to have a disparate impact.

Additionally, all new routes featuring the presence of new route numbers, new route alignments, new service types or new service configurations will require an equity analysis with the exception of supplemental services designed to reduce potential overcrowding on regular transit routes.



For a new route, the methodology for analysis requires determining if the new route causes a major service change in an existing route. If it is determined that the new service causes an increase in travel time of more than 15 minutes for any minority or low-income transit route that is affected by the new service, then the change will be deemed to have a disparate impact.

For the discontinuation of a minority or low-income transit route or portion of a route, the analysis will determine the availability of an alternative route or service within one-quarter mile. If there is no alternative within one-quarter mile, then the route or service discontinuation will be deemed to have a disparate impact.

Moreover, in addition to the thresholds triggering an equity analysis, a service change proposal may be submitted for equity analysis and public hearing at the discretion of the Board of Commissioners or the Chief Executive, even if the proposed service change does not meet the threshold for a major service change.

Fare Analysis

A Fare Analysis is conducted for all changes in transit fares whether there is a major service change or not. A Fare Analysis assesses the effects of proposed fare changes (including increases and decreases) via a methodology to determine if minority and low-income riders are more likely to use the mode of service, type of payment or payment media subject to a change in the fare. The RTA will determine if, and the extent to which the effects of a fare change disproportionately impacts low-income communities and/or communities of color.

The methodology for conducting a social equity analysis for a fare change involves identification of the fare type (one ride, day pass, multi-day, monthly pass, etc.) by ethnicity; comparison of the fares paid under the change with fares that would be paid through available alternatives; and description of actions to avoid, minimize or mitigate adverse effects of the proposed change on low-income and minority populations.

Implementation Exceptions

The RTA may implement a fare change or (major change in service) that would have a disparate impact on EJ protected populations if it is determined that the fare change or service reduction meets a substantial need that is in the public interest and that the alternative would have more severe adverse effects than the proposed fare or service change.

Public Notice

When a “major service change” is proposed by the RTA, the RTA will conduct public outreach as defined in the Public Participation Plan detailed in Section XV.

XIII. FACILITY SITE EQUITY ANALYSIS

The RTA has not identified or constructed a facility during the period covered by this Policy Manual.

Although no new sites were identified or acquired in the reporting period, the RTA is committed to adhering to the federal regs should the need arise.

Specifically, 49 CFR Section 21.5(b)(3) states, "In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part." Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, "The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin." For purposes of this requirement, "facilities" does not include bus shelters, as these are transit amenities, nor does it include transit stations, power substations, etc., as those are evaluated during project development and the NEPA process. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. In order to comply with the regulations:

- The RTA 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. Outreach to persons potentially impacted by the siting of facilities will be conducted. 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.
- When evaluating locations of facilities, the RTA should 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 where appropriate to ensure that proper perspective is given to localized impacts.
- If the RTA determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, the RTA may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. The RTA will show how both tests are met; it is important to understand that in order to make this showing, the RTA must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

XIV. EQUITY ANALYSIS

The RTA performed an Equity Analysis in 2022 with regard to its New Links Redesign. Refer to **Attachment 5**.

The FTA requires the RTA to establish policies that will guide the analysis to determine whether major service changes will have a disproportionately negative impact on minority or low-income populations. Accordingly, the RTA established equity analysis policies and a service evaluation process to meet this requirement.

Title VI prohibits intentional discrimination, as well as actions that result in unintentional discrimination or disproportionate adverse impacts to communities of color and low-income communities. As such, to ensure that the proposed changes to services and fares are equitable, the RTA will conduct a Service and Fare Equity Analysis for all Major Service Changes, where a major service change meets the following threshold.

- Any change of more than 25% of the revenue hours or route miles on a given transit route (bus or streetcar) or route branch for an individual day (weekday, Saturday or Sunday) and is measured as happening at one time or within a single year.
- Any change to the span of service on a given transit route (bus or streetcar) of 2 hours or more for an individual day (weekday, Saturday or Sunday).
- The introduction of any new transit route (bus or streetcar) with the exception of supplemental service designed to reduce potential overcrowding on regular (schedule) transit routes.
- The discontinuation of a route or portion of a route with no alternative service within $\frac{1}{4}$ miles.

For all routes with proposed changes that meet the major service change threshold RTA will conduct a social equity analysis to:

1. Determine the benefits to and potential negative impacts on minority and low-income populations;
2. Quantify expected effects (positive or negative); and
3. Determine the appropriate course of action to prevent, minimize or mitigate the impacts as warranted.

XV. PROGRAM SPECIFIC REQUIREMENTS

Service Standards and Policies

RTA uses performance standards to measure the effectiveness and efficiency of transit services. The agency has established service standards that present minimum quality thresholds for quality of service with service reliability based on three important transit industry measures:

- Ridership (passengers per scheduled revenue service hour)

- Overcrowding (Ridership based upon seats available using passenger miles divided by seat miles per vehicle per route)
- Efficiency (Net Operating Cost of subsidy per passenger)

Ridership

Relative to ridership, the RTA determines average of ridership per hour by headway frequency. Routes with ridership greater than 125% of the headway average are deemed eligible for more service if funds are available; and lines with ridership less than 75% of the headway average are either adjusted or reduced (often allowing for additional service on those lines with ridership greater than 125% of the average).

Overcrowding

In evaluating overcrowding or ridership based on seats available, RTA determines seating capacities by line at weekday peak times. Lines with ridership greater than 140% of the available seating are deemed eligible for more service if funds are available.

Efficiency

Efficiency is measured in terms of deficit or subsidy per passenger. RTA reviews passenger subsidy levels by line twice annually, and lines (bus or streetcar) with the greatest subsidy may be considered for reduction or adjustment. As well, newly added lines are also monitored at a six month and twelve-month interval following implementation.

On-Time Performance

RTA also evaluates on-time performance as a critical measure of reliability, with standards for very frequent services (service that operates in intervals of 12 minutes or less) and also less frequent services operating at more than every 12 minutes.

Transit Access (Service Availability)

The Service Policy Analysis illustrates that 86% of people living in New Orleans and 54% of Kenner residents have access to transit within a ¼ mile of their home. In New Orleans, 97% of residents have transit access within a ½ mile of their home and in Kenner, 83% of residents, have transit access within a ½ mile of their home. The minority population has slightly higher level of access for both a ¼ mile and half mile buffer as detailed below.

Table 5: Transit Access for Minority Populations 2021 – ¼ and ½ mile Buffers

Source: US Census Bureau, American Community Survey 5-Year Estimates, 2021.

| RTA Orleans Parish Service Area (SA) 2021 Demographics | | | | Orleans SA RTA New Links Recommended System Buffer Demographics (1/4 mile & 1/2 mile) | | | | | |
|--|--|---|-----------------------------|--|--|--------------------------------|-------------------------------------|---|-------------------------------|
| Demographic Theme | Service Area Universe: Total Pop or HH | Demographic Theme Count in Service Area | Theme Percent for Threshold | Pop or HH in .25mi buffer (Universe) | Demographic Theme Count in .25 mi buffer | Theme Percent for .25mi buffer | Pop or HH in .5mi buffer (Universe) | Demographic Theme Count in .5 mi buffer | Theme Percent for .5mi buffer |
| Minority Population | 390,845 | 258,202 | 66.06% | 314,033 | 213,879 | 68.11% | 362,871 | 249,508 | 68.76% |
| Hispanic/Latino Population | | 21,413 | 5.48% | | 17,432 | 5.55% | | 19,779 | 5.45% |
| Population in Poverty | 377,095 | 89,340 | 23.65% | 302,477 | 77,045 | 25.47% | 349,968 | 86,766 | 24.79% |
| Household in Poverty | 153,819 | 36,540 | 23.76% | 124,534 | 31,726 | 25.48% | 142,967 | 35,447 | 24.79% |
| Service Area sums totals for Orleans Parish only. | | | | Buffer Area sums totals for RTA New Links Recommended System 2021 produced in ArcGIS in local State Plane Projection NAD83 feet. | | | | | |
| Demographics from American Community Survey (ACS) 5 Year Estimates (2015 thru 2019). | | | | Tabulate Intersection tool in ArcGIS computes the percent intersection between two feature classes (Block group ACS demographics and system dissolved buffers - 1/4 mile and 1/2 mile) and cross tabulates the statistics based upon the percent area of the block group intersection. | | | | | |

| RTA Kenner Service Area (SA) 2021 Demographics | | | | Kenner SA RTA New Links Recommended System Buffer Demographics (1/4 mile & 1/2 mile) | | | | | |
|--|--|---|-----------------------------|--|--|--------------------------------|-------------------------------------|---|-------------------------------|
| Demographic Theme | Service Area Universe: Total Pop or HH | Demographic Theme Count in Service Area | Theme Percent for Threshold | Pop or HH in .25mi buffer (Universe) | Demographic Theme Count in .25 mi buffer | Theme Percent for .25mi buffer | Pop or HH in .5mi buffer (Universe) | Demographic Theme Count in .5 mi buffer | Theme Percent for .5mi buffer |
| Minority Population | 66,777 | 23,797 | 35.64% | 23,862 | 10,001 | 41.91% | 43,931 | 16,879 | 38.42% |
| Hispanic/Latino Population | | 17,116 | 25.63% | | 7,073 | 29.64% | | 12,538 | 28.54% |
| Population in Poverty | 66,237 | 11,469 | 17.32% | 23,576 | 5,084 | 21.57% | 43,505 | 8,890 | 20.43% |
| Household in Poverty | 24,891 | 3,913 | 15.72% | 8,801 | 1,676 | 19.05% | 16,263 | 3,004 | 18.47% |
| Service Area sums totals for the City of Kenner only. | | | | Buffer Area sums totals for RTA New Links Recommended System 2021 produced in ArcGIS in local State Plane Projection NAD83 feet. | | | | | |
| Demographics from American Community Survey (ACS) 5 Year Estimates (2015 thru 2019). | | | | Tabulate Intersection tool in ArcGIS computes the percent intersection between two feature classes (Block group ACS demographics and system dissolved buffers - 1/4 mile and 1/2 mile) and cross tabulates the statistics based upon the percent area of the block group intersection. | | | | | |

Source: US Census Bureau, American Community Survey 5-Year Estimates, 2021.

Vehicle Load

The RTA's fleet includes lift equipped vans, 60-foot articulated buses, 35- and 40-foot buses, streetcars, passenger only ferry boats and vehicle carrying ferry boats. The agency places appropriately sized vehicles with seating capacity based on ridership demand and the street network. The RTA's policy for vehicle load is 1.33 (percent) for buses and 1.54 (percent) for streetcars. Load factor analysis, performance reports and documentation of service monitoring to identify potential disparities are conducted annually.

Distribution of Transit Amenities

Transit stop amenities should be installed based on ridership in order to benefit the largest number of riders. Transit stop amenities include such things as transit shelters, seating, waste receptacles, lighting, information signs, maps, and schedules. In addition to ridership, special consideration may be given to locations with high connections to other lines or the presence of community facilities.

Eligibility Scoring Criteria

The RTA uses a comprehensive scoring system to determine which transit stops are eligible to be considered for a transit shelter or bench. The scoring system considers how many people wait at a stop, how long they are likely to wait, and who is likely to be waiting.

Measured by the following criteria, transit stops must score a minimum of 30 points to be eligible for a new shelter, 15 points for a new bench:

- How many people are waiting?

- Boardings – 1 point per average weekday boarding
- How long are people waiting? (up to 10 points)
 - Transfers – 7 points if the stop is located at a location with transfer opportunities between at least four different transit lines.
 - Frequency – 3 points if the stop is served by fewer than two vehicles per hour during the weekday AM peak, midway, and PM peak periods.
- Who is waiting? (up to 10 points)
 - Transit Propensity – 5 points if the stop is in an area in which the households within a quarter-mile (1/4) walkshed have a higher transit propensity than the service area average. Transit propensity is determined as part of the Transit Propensity Index (TPI).
 - Human services facilities – 5 points if one or more of the following are within 750 feet of the stop: assisted living facility, dialysis center, hospital, pharmacy/clinic, public library, public school, recreation center, senior center, or grocery store.

Installation priority is given based on total score. Regardless of other factors, a transit stop must have at least 15 daily riders to be considered for a shelter and 8 daily riders to be considered for a bench. This is to protect against circumstances that may preclude installation of transit stop amenities are as follows:

- Plans are in place to relocate or close the stops.
- Amenities would compromise pedestrian or operational safety.
- Adequate right-of-way is not available.
- Environmental factors.

Transit Shelter Design

The design and placement of a shelter at a specific stop will be dictated by the RTA's Transit Facility Design Guidelines, in accordance with City, State, and Federal rules in relation to historic preservation and accessibility.

Geographic Equity

To ensure riders throughout the RTA's service areas are provided substantially similar amenities, potential shelter locations will be evaluated for geographic disparity with a goal of not more than

a 7% disparity between neighborhoods based on the ratio of transit stops within a given neighborhood to the number of residents.

Shelter Requests

Riders and community members may request the placement of a shelter by contacting the RTA's Ride Line at 504-248-3900 or emailing comments@norta.com. The request information is used by the RTA to better understand unique conditions that may classify the transit stop as a priority location. Unfortunately, the RTA is unable to place shelters at all locations for which requests are received.

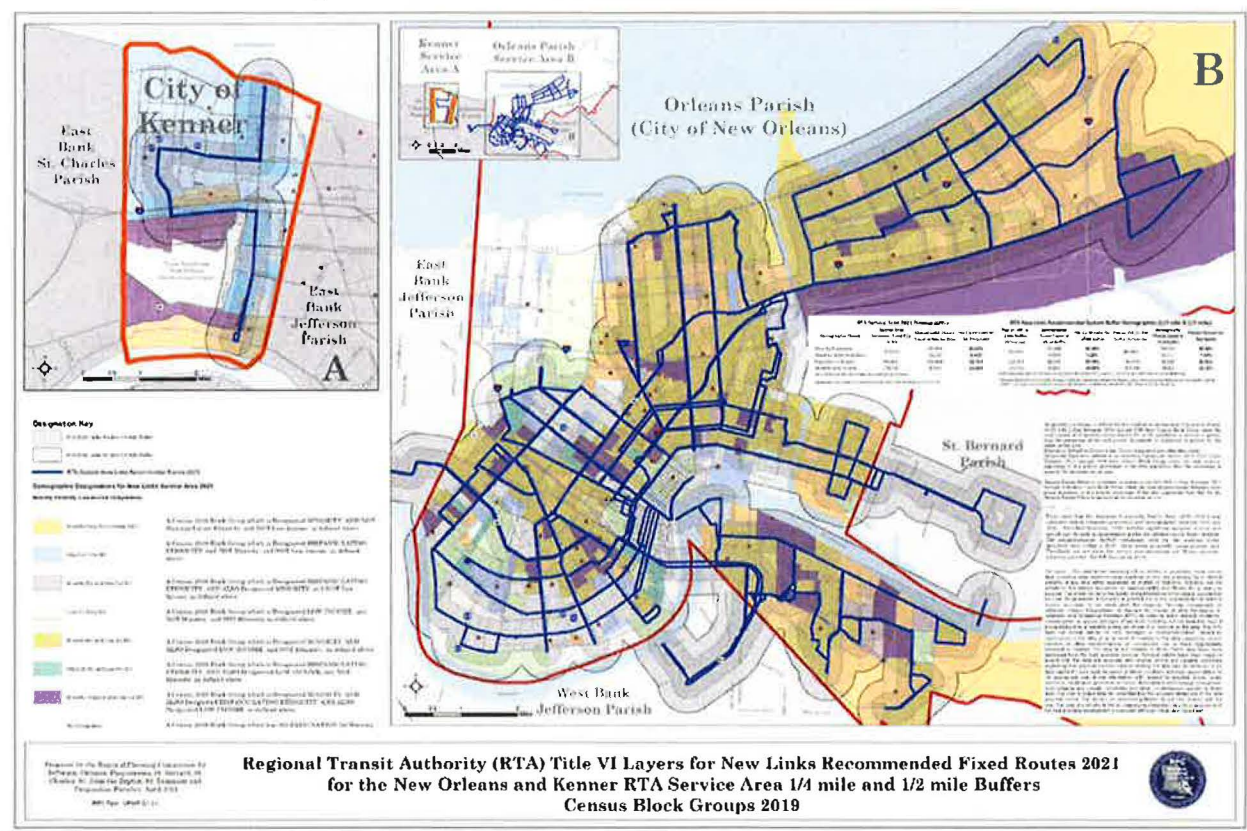
Level of Service Monitoring Report

In compliance with FTA Circular 4701.1B relative to Title VI requirements, the RTA will evaluate services annually to determine if adjustments to service are warranted based on comparison of minority- and low-income transit routes to non-minority or low-income routes (routes where less than 33% of revenue miles serve minority and low-income populations). The annual Level of Service Monitoring Report involves comparative analysis of low-income, minority, and non-minority routes relative to service standards for vehicle load, vehicle headway, on-time performance, and service accessibility. Additionally, a comparative analysis is required relative to policies for vehicle assignment and distribution of amenities. The methodology utilized by the RTA in development of the Level of Service Monitoring Report will involve the following analysis:

- Selection of a sample of minority, low-income and non-minority bus and streetcar routes;
- Assessment of the performance of each minority, low-income and non-minority route in the sample for each RTA service standard;
- Comparison of the services provided for each route;
- Determination if the minority and/or low-income routes in the sample fails to meet the service standard;
- Determination of the reason the route failed to meet the standard and development of a corrective action plan;
- Evaluation of the distribution of transit amenities to determine if amenities are distributed equitably throughout the system.

As well, on a triennial basis, or as warranted by new demographic data, and/or changes to existing data or at the request of the Board of Commissioners or Chief Executive, RTA will determine if routes meet the criteria as a minority- or low-income transit route as described in FTA Circular 4702.1B using available data from the U.S. Census, the New Orleans Regional Planning Commission (RPC), and the City of New Orleans combined with RTA data sets and reports.

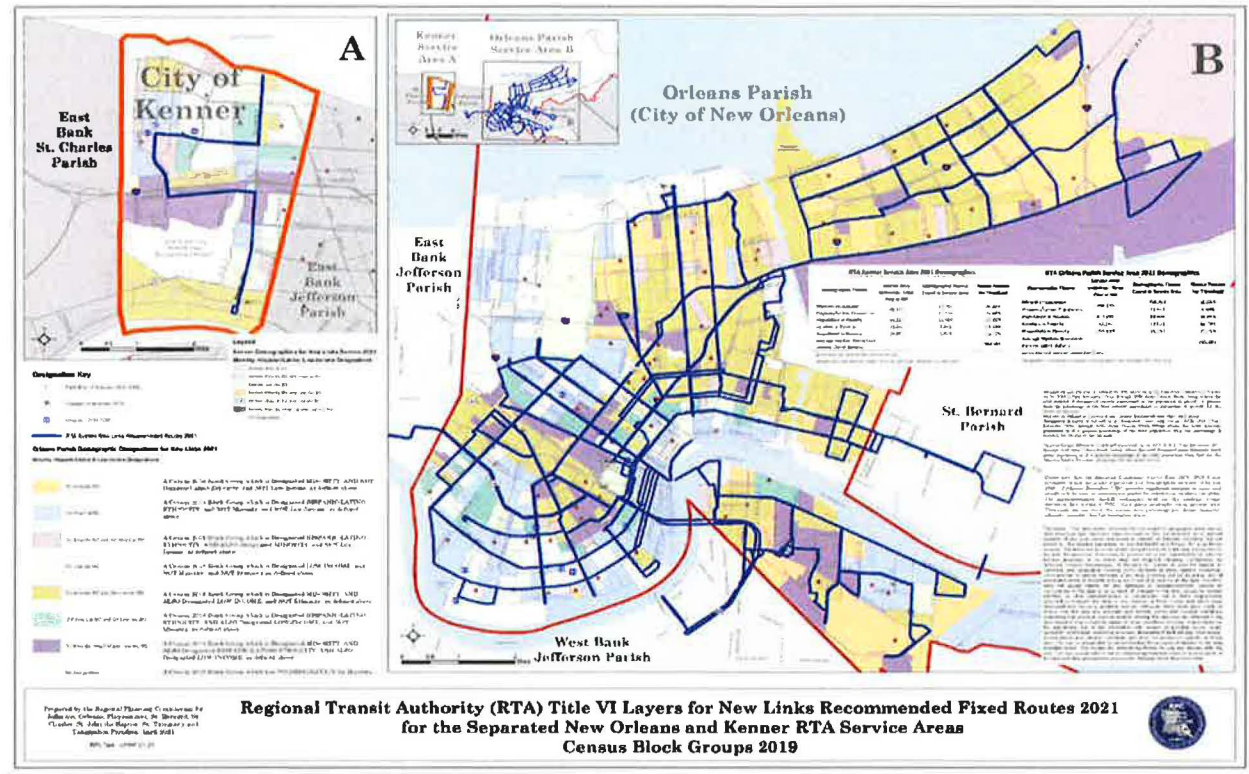
Figure 1: Fixed Transit Routes for RTA Service Areas



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of Orleans Parish and Kenner (66% and 34% respectively). The census blocks are displayed with the existing transit and fixed guideway routes. These census blocks served as the base for identifying minority and low-income routes. *See figure 2.*

Figure 2: RTA Service Areas & Minority, Hispanic/Latino and Low-Income Areas



XVI. PUBLIC PARTICIPATION PLAN

For major service and fare changes a public hearing will be scheduled and advertised in such a manner as to inform the public of the proposed changes, and provide an opportunity for public comment on those changes. To ensure that customers with limited English proficiency will have the opportunity to actively participate in the process, all advertising will be prepared consistent with RTA's current Language Assistance Plan. The official legal notice will be placed in the major metropolitan newspaper with the largest distribution (currently the New Orleans Advocate) at least five (5) days prior to the date of the public hearing. Additionally, RTA will publicize the public hearing by placing relevant information on the RTA website.

The notice of public hearing for major service or fare change shall contain the following information:

- The route names and numbers of the services that would be affected, as well as the proposed effective date of the change;
- The date, time, and location of the public hearing;
- A statement of the intent of the public hearing to provide an opportunity for interested persons or organizations to be heard with respect to the proposed changes;
- Notice that comments can be provided verbally or in writing, establishing the date of the public hearing as the deadline for written submissions and providing a mailing address, fax number and e-mail address;
- A statement informing the public of the location where a copy of the proposed changes is available for inspection;
- A statement that the RTA does not discriminate on the basis of disability and the name and contact information for the RTA's representative designated to coordinate compliance with the Americans with Disabilities Act and how that person may be contacted 72 hours in advance of the meeting with an accommodation request;
- A statement of compliance with transit-related benefits in accordance with Title VI of the Civil Rights Act of 1964.

Any item subject to a public hearing will be listed and described in the Board's published agenda which shall be posted at least 72 hours in advance at the Board's meeting place.

RTA will also notify stakeholder and community groups by sending email blasts of the public hearing, summarizing the proposed changes, and specifying the methods for providing comments. Finally, RTA may publicize the public hearing and provide a summary of the proposed changes to the public.

RTA will ensure maximum feasible participation for minority and low-income populations in all major service change and fare change decisions.

XVII. ASSESSMENT OF COMPLIANCE

The RTA's Title VI plan was approved by the Board of Commissioners on March 28, 2023. The Resolution of the Board of Commissioners is provided as **Attachment 7**.

XVIII. ATTACHMENTS

The following documents are supplementary attachments to the Title VI report.

1. COMPLAINT PROCESS

DISCRIMINATION COMPLAINT PROCESS

Revised January 2023

APPLICABILITY

The Title VI complaint procedures are intended to provide customers, beneficiaries, and employees of the RTA an avenue to raise complaints of discrimination regarding the agency's programs, activities, and services. These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Civil Rights Restoration Act of 1987, the Americans with Disabilities Act of 1990, the Age Discrimination Act of 1975, Title 49 CFR part 21, and all applicable statutes, policies, and orders relative to Limited English Proficiency and Environmental Justice. Any person who feels that they have been subjected to discrimination by the RTA or by any contractor, consultant or subrecipient of the RTA has the right to file a complaint with the RTA's Department of Civil Rights.

These procedures do not deny or limit the right of a complainant to file a formal complaint with any outside enforcement agency (i.e. US Department of Transportation, Louisiana Department of Transportation, Federal Transit Administration, US Department of Justice, etc.) or to seek private counsel for complaints alleging discrimination.

FILING OF FORMAL COMPLAINTS

All Title VI and related statute complaints are considered formal as there is no informal process for filing or investigating a Civil Rights grievance.

Eligibility

All complaints shall be investigated unless:

- The complaint is withdrawn;
- The complainant fails to provide required information after numerous requests;
- The complaint is not filed within the 180-day time frame of the incident or event;
- The basis of the complaint is not covered by Title VI and/or related statutes.

The complaint procedures apply to the users, beneficiaries, employees and participants of the RTA's programs, services, and activities. As such, any person who believes that they have been excluded from participation in, or has been denied benefits or services of any program or activity conducted by the RTA or by any contractor, consultant, or sub-recipient of the RTA on the basis of race, color or national origin may bring forth a complaint of discrimination under Title VI.

Complaint Basis

Allegations must be based on issues involving race, color, or national origin as defined below.

| Protected Group Categories | Definition |
|-----------------------------------|--|
| Race | An individual belonging to one of the accepted anthropological racial groups: or the perception based on physical characteristics that a person is a member of a racial group. |
| Color | Color of skin including shade of skin within a racial group. |
| National Origin | National birth site. Citizenship is not a factor. Discrimination based on language or a person's accent is covered by national origin. |

Initial Contact

For complaints filed with the RTA, the initial contact should be directed to the Title VI Coordinator within 180 days of the alleged discriminatory event or practice. The complaint form can be accessed at RTA's administrative office or downloaded from the agency's website at www.norta.com. The form must be filled out, signed, and forwarded to:

Detrich D. Hebert Johnson
Title VI Compliance Coordinator
2817 Canal Street
New Orleans, LA 70119
Phone: 504.827.8377
Fax: 504.648.5130
E-Mail: civilrights@rtaforward.org

Compliant forms can be forwarded electronically, mailed or hand delivered.

If a complainant is unable to or incapable of providing a written complaint, a verbal complaint will be accepted and transcribed by the Title VI Coordinator. However, all complaints must be signed by the complainant.

ROLES AND RESPONSIBILITIES

The Title VI Coordinator has overall responsibility for the discrimination complaint process and procedures and has unfettered access to the Chief Executive Officer of the RTA.

The Title VI Coordinator is responsible for receiving all complaints, maintaining a log of all complaints, reviewing, investigating, and reporting all complaints, and assisting complainants that are unable to prepare a written complaint.

The Title VI Coordinator has responsibility for conducting an impartial and objective investigation, collecting all relevant and available factual information and preparing a fact-based report drawing upon the information obtained from the investigation.

COMPLAINT REVIEW AND INVESTIGATION

Initial Review

The Title VI Coordinator reviews the complaint upon receipt to ensure that:

1. relevant information is provided;
2. the complaint is timely; and
3. the basis of the complaints meets jurisdiction of Title VI and/or other relevant statutes.

If the complaint is deemed incomplete, additional information will be requested and the complainant will be provided 60 days to submit the required information. Failure to submit the requested additional information may be considered good cause for a determination of no investigative merit.

If the Title VI Coordinator determines that the agency has jurisdiction and that the complaint has sufficient merit to warrant investigation (meets the criteria defined above in Eligibility), the Title VI Coordinator will send a written correspondence to the complainant within 10 calendar days, acknowledging receipt of the complaint, and their rights under Title VI and related statutes. At the point that the Title VI Coordinator determines that a complaint warrants investigation a chronological contact sheet is developed and maintained in the case file throughout the investigation.

If the decision is made not to investigate the complaint, the complainant will be notified in writing within 10 calendar days and the notification shall state the specific reasons the complaint was deemed to not have investigative merit.

Investigation

Within 60 calendar days of the decision to proceed, the Title VI Coordinator will conduct and complete an investigation of the allegations to include recommended actions as warranted to correct any discriminatory practices. The investigation will address the basis for the complaint, the issues, events, or circumstances that caused the complainant to believe that they have been discriminated against, the information needed to address the issue, the sources of information and the remedy sought by the complainant if applicable.

The investigation process will include review of any and all relevant documents, reports, video, etc. As well, focused interviews with key contacts will be conducted as applicable to obtain facts and evidence regarding the allegations in the complaint. The investigator will elicit information from all contacts and witnesses that can provide firsthand information about the incident, event or action specified in the complaint. All relevant documentation, including interview notes and/or recordings will be dated. Additionally, a chronological contact sheet will be maintained in the case file throughout the investigation.

The investigation will address only those issues relevant to the allegations of the complaint and confidentiality will be maintained to the maximum extent feasible.

Resolution

At the conclusion of the investigation and within 60 days of receipt of the complaint the Title VI Coordinator will notify the complainant in writing of the final decision reached, the disposition of the allegations and any proposed corrective actions.

Record Keeping

All records and investigative working files are maintained in a confidential area by the Title VI Coordinator. Records of Title VI complaints will be maintained for a period of 10 years.

Reporting Requirements

A copy of the complaint, together with a copy of the report of investigation, if applicable is forwarded to the FTA within 60 days of receipt.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.



**Title VI Complaint Form
Regional Transit Authority
Office of Civil Rights**

RTA is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Title VI 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 Title VI Coordinator by emailing civilrights@rtaforward.org. The completed form must be returned to RTA Office of Civil Rights, Title VI Coordinator, 2817 Canal Street, New Orleans, LA 70119

| | |
|---|---|
| Name: | Telephone (Home): Alt. Phone: |
| Address: | Electronic Mail Address: |
| | Access Format Requirement: Large Print ____ Audio Tape ____ TDD ____ Other ____ |
| Person(s) discriminated against (if someone other than complainant): Name(s): | |
| Street Address, City, State & Zip Code: | |
| Which of the following best describes the reason for the alleged discrimination took place? (Circle all that apply) <ul style="list-style-type: none">• Race• Color• National Origin | Date of Incident: Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information. |
| | If information is needed in another language, then contact (504) 248-3900. |

Complete reverse side of form



Please describe the alleged discrimination incident (continued)

| | | |
|--|--|--------------|
| Agency: | Contact Name: | |
| Street Address, City, State & Zip Code: | Phone: | |
| Agency: | Contact Name: | |
| Address, City, State & Zip Code: | Phone: | |
| I affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. | Complainants Signature: | Date: |
| | <hr/> Print or Type Name of Complainant | |

Received By: _____

2. LIMITED ENGLISH PROFICIENCY (LEP) ANALYSIS AND PLAN

OVERVIEW

On December 14, 2005, the US Department of Transportation (DOT) published revised guidance for its recipients on the Implementation of Executive Order 13166, “Improving Access for Persons with Limited English Proficiency”. Limited English Proficiency (LEP) is a term used to describe people who do not speak English as their primary language and who may have limited ability to read, write or speak English. The Executive Order requires that DOT-funded agencies take responsible steps to ensure meaningful access to the benefits, services, information, and programs for individuals who are LEP and that recipients of DOT funds should use the DOT LEP guidance to determine how best to comply with statutory and regulatory obligations to provide access to benefits and services. As well, the Federal Transit Administration (FTA) references the DOT LEP guidance in its Circular 4702.1A, “Title VI and Title VI-Dependent Guidelines for FTA Recipients” published April 13, 2007, which reiterates LEP mandates under Title VI.

The RTA in New Orleans supports the goals of DOT for providing meaningful access to its services by LEP individuals. RTA is committed to ensuring compliance with Executive Order 13166 and strives to provide effective, efficient, and equitable service to all citizens regardless of their ability to speak, read or write English.

The RTA follows the U.S. Department of Justice guidelines using the “four-factor analysis” process to determine the number and proportion of LEP individuals in the region. As detailed below, this information aids the RTA in planning how to cost effectively provide transit and information services to LEP individuals.

FOUR-FACTOR ANALYSIS

Factor 1 - Number and Proportion of LEP Persons

Demographic Data

The RTA reviewed 2019 American Community Survey (ACS) data for the New Orleans Metropolitan area -- the most accurate data available -- for race and gender identification for the city of New Orleans. As of 2019, the ACS data indicates 33.9% of the New Orleans population is white, 59.5% is Black, 2.9% is Asian and 5.5% is Latino. In examining data relative to language use the ACS indicates that 90.3% of the population reports English as a primary language. Of the remaining 9.7% of the population, 4.8% report Spanish as a primary language (14,442 people) and 2.5% reported Asian (7,522 people). The remaining 2.4% reported other languages as their primary language.

**U.S. Census Data for the Population 5 Years of Age and Over
2019 American Community Survey – 5 Year Estimates**

| Population 5 Years and Over by Language Spoken at Home and Ability to Speak English | New Orleans, Orleans Parish Louisiana | |
|--|--|-------------|
| Population 5 years and over | | |
| <i>Total</i> | 300,892 | 100% |
| Speak Only English | 271,705 | 90% |
| Speak a Language Other Than English | 29,187 | 10% |
| | | |
| <i>Spanish</i> | 14,442 | 100% |
| Speak English Very Well | 7,799 | 54% |
| Speak English Less Than Very Well | 6,357 | 46% |
| | | |
| <i>Vietnamese</i> | 7,522 | 100% |
| Speak English Very Well | 3,686 | 49% |
| Speak English Less Than Very Well | 3,836 | 51% |
| | | |
| <i>All Other Languages</i> | 7,036 | 100% |
| | | |

RTA has determined that Spanish and Vietnamese speaking individuals make up the majority of the region's LEP population. While Vietnamese is spoken by less than 5% of the population, the Vietnamese-speaking population exceeds 1,000 people per effected neighborhood, and as such requires LEP services.

Geographic Data

Working with the RPC, the Metropolitan Planning Organization (MPO) for the New Orleans region, the RTA utilizes the latest U.S. Census data, ACS data, and Louisiana Department of Social Services data to identify target populations. To form the most accurate profile of these populations it is in RTA's best interest to use the smallest geographic unit available for which information is obtainable for all relevant groups. The smallest geographic area that the Census Bureau calculates the appropriate information on each relevant group is block group level, which the RPC utilizes in all map products and planning efforts. The Louisiana Department of Social Services Data is available by point data and then is agglomerated into block level data for privacy issues. American Community Survey data is available for the New Orleans Metropolitan Region.

RTA has identified seven relevant groups for Title VI analysis as described below:

- Low Income
- Federal Assistance Recipients

- Minority
- Elderly
- Limited English Proficiency (LEP) or English spoken as a second language
- Disabled Populations
- Zero Car Households

Once the RTA identified target populations for Title VI consideration, to include LEP individuals, maps have been prepared (working with the RPC) that show their distribution throughout the area and how they relate to planning and development of transit lines, routes, scheduling, maintenance, and infrastructure projects.

Factor 2 -- Frequency of Contact

Experience of Agency

In determining the frequency of contact, the primary level of analysis involved focused interviews of agency personnel to include both office staff and operators. Focused interviews with managers revealed that the number of Hispanic and Vietnamese LEP persons needing assistance averages less than one percent of customers seeking free/reduced fare services for the elderly and/or disabled, similarly Ride Line and paratransit reservationists also received less than one percent of the total for services on a weekly basis.

Customer service personnel did not report receiving calls from Hispanic citizens regularly and only occasional contact with Asian customers. Additionally, managers advised that less than 1 percent of all requests for reduced fare services for the elderly and/or disabled, and paratransit were received from Asian LEP persons needing assistance. Notably, managers advise that non-English speaking Asian customers that come to the RTA for access to services are generally accompanied by an English-speaking member of the community.

With regard to requests for public information and/or public participation, there are Spanish and Vietnamese RTA outreach employees who attend public meetings hosted by the agency to provide translation.

Factor 3 -- Importance of Programs

Agency Services in Order of Critical Importance

There is a significant population of Vietnamese resident in New Orleans East. The RTA maintains communication with the leaders of the Vietnamese community, particularly Mary Queen of Vietnam Church, Asian/Pacific Society of New Orleans and the Asian Chamber of Commerce. The Hispanic population is larger and less concentrated. The RTA has a relationship with Latinos in Transit and the Hispanic Chamber of Commerce. Through these channels of communication the RTA is able to stay informed about these community's needs and has a means of informing them of upcoming RTA projects.

The RTA has contracted with translation services for both verbal and written translation of all necessary documents whenever significant populations of LEP persons are impacted.

Factor 4 -- Available Resources and Costs

Inventory of Language Assistance Measures

Currently the RTA's schedules and system maps are printed with Spanish and Vietnamese translation for route and fare information. With regard to outreach, the RTA's public outreach and information programs involve print and electronic media and neighborhood level outreach to ensure that the community is informed of and has access to decision-making and changes to agency policy and programming. Spanish and Vietnamese speaking RTA outreach employees attend public meetings for translation.

Relative to neighborhood outreach, the agency conducts outreach activities with both Hispanic and Asian groups including:

- Asian Chamber of Commerce
- Asian/Pacific Society of New Orleans
- Hispanic Chamber of Commerce
- Mary Queen of Vietnam Church
- Latinos in Transit

All planning activities are conducted in accordance with the National Environmental Policy Act (NEPA) and include translation accommodations for LEP persons upon request. Public meetings and hearings associated with planning activity include public notice to Spanish and Vietnamese community-based organizations.

Limited English Proficiency Plan

Language Assistance Measures

Print and Electronic Information

The RTA provides, upon request, printed bus routes, maps, and schedules in both Spanish and Vietnamese. These materials will be available at the agency's main location. As well, ticketing kiosks will provide fare and route information in Spanish.

Additionally, all applications for services, notices of rights, complaint and appeal forms and processes, notification of award, denial, loss or decrease in benefits and feedback forms and processes are available in Spanish and Vietnamese at the RTA's offices, as well as on the agency's website.

The RTA's website provides Spanish and Vietnamese translation services. Additionally, the agency has completed a Plan, Pay & Ride with RTA Guide in Spanish and Vietnamese and notify

the LEP communities of the availability of this tool through targeted outreach with LEP community partners.

LEP Callers

The RTA contracts with an on-demand interpretation service that is available for LEP callers to our forward-facing customer service staff. The service is available for speakers of Spanish, Vietnamese, and many other languages. Also, all road supervisors are aware of the procedure to obtain language assistance should a LEP passenger be encountered on the routes.

Written Communications

The agency will ensure that all applications for services, notices of rights, complaint and appeal forms and processes, notification of award, denial, loss or decrease in benefits and feedback forms and processes are available in Spanish and Vietnamese. Additionally, written correspondence and communications that are received in Spanish or Vietnamese will be translated and responded to in the appropriate language.

Outreach and Information

All service change, construction and public safety notices will be available on the agency's website in Spanish and Vietnamese and will be advertised via signage, brochures and other notices in Spanish and Vietnamese. Finally, the RTA will provide translation services upon request for all public meetings.

Staff Training

Agency staff that is most likely to come into contact with LEP persons includes operators, paratransit and ADA staff, Ride Line personnel and other customer service personnel. As part of their regular training, these front-line employees, as well as supervisors and managers, receive instruction in:

- The agency's responsibility for Title VI and LEP guidelines;
- A description of the type of language assistance that RTA is currently providing and instructions on how staff can access these products and services.

Notice to LEP Persons

To ensure that LEP populations are aware of the services the agency provides notices and public service announcements, written notices will be made available through targeted outreach activities in collaboration with Hispanic and Asian groups including:

- Asian Chamber of Commerce
- Asian/Pacific Society of New Orleans
- Hispanic Chamber of Commerce

- Mary Queen of Vietnam Church
- Latinos in Transit

LEP populations will be notified of any changes to the agency's LEP plan or changes to the level of service the agency offers as the long-term plan for IVR, and translation services are upgraded. Additionally, the agency's Title VI Compliant form and process will be translated into Spanish and Vietnamese and made available to LEP populations.

Monitoring

The RTA will annually review its LEP Plan to determine if changes have occurred in:

- The LEP populations in the service area or population encountered.
- Frequency of encounters with LEP language groups.
- Available resources and sources of additional resources and associated costs.
- Staff's knowledge and understanding of the LEP plan, language assistance resources and how to serve LEP individuals.

3. CIVIL RIGHTS ASSURANCES

FEDERAL FISCAL YEAR 2022 CERTIFICATIONS AND ASSURANCES FOR FTA ASSISTANCE PROGRAMS

(Signature pages alternate to providing Certifications and Assurances in TrAMS.)

Name of Applicant: Regional Transit Authority

The Applicant certifies to the applicable provisions of all categories: (check here) _____.

Or,

The Applicant certifies to the applicable provisions of the categories it has selected:

| Category | Certification |
|--|-------------------------------------|
| 01 Certifications and Assurances Required of Every Applicant | <input checked="" type="checkbox"/> |
| 02 Public Transportation Agency Safety Plans | <input type="checkbox"/> |
| 03 Tax Liability and Felony Convictions | <input checked="" type="checkbox"/> |
| 04 Lobbying | <input checked="" type="checkbox"/> |
| 05 Private Sector Protections | <input checked="" type="checkbox"/> |
| 06 Transit Asset Management Plan | <input checked="" type="checkbox"/> |
| 07 Rolling Stock Buy America Reviews and Bus Testing | <input checked="" type="checkbox"/> |
| 08 Urbanized Area Formula Grants Program | <input checked="" type="checkbox"/> |
| 09 Formula Grants for Rural Areas | <input checked="" type="checkbox"/> |
| 10 Fixed Guideway Capital Investment Grants and the Expedited Project Delivery for Capital Investment Grants Pilot Program | <input checked="" type="checkbox"/> |
| 11 Grants for Buses and Bus Facilities and Low or No Emission Vehicle Deployment Grant Programs | <input checked="" type="checkbox"/> |

Certifications and Assurances

Fiscal Year 2022

- 12 Enhanced Mobility of Seniors and Individuals with Disabilities Programs
- 13 State of Good Repair Grants
- 14 Infrastructure Finance Programs
- 15 Alcohol and Controlled Substances Testing
- 16 Rail Safety Training and Oversight
- 17 Demand Responsive Service
- 18 Interest and Financing Costs
- 19 Cybersecurity Certification for Rail Rolling Stock and Operations
- 20 Tribal Transit Programs
- 21 Emergency Relief Program

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CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE

AFFIRMATION OF APPLICANT

Name of the Applicant:

Regional Transit Authority

BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in the federal fiscal year, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it.

The Certifications and Assurances the Applicant selects apply to each Award for which it now seeks, or may later seek federal assistance to be awarded by FTA during the federal fiscal year.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 *et seq.*, and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute



In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

Signature Mark Raymond, Jr. Date: 3/1/22
 Name Mark Raymond, Jr. Authorized Representative of Applicant

AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): Regional Transit Authority

As the undersigned Attorney for the above-named Applicant, I hereby affirm to the Applicant that it has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it.

I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.

Signature N. S. Hakey Date: 3/1/22
 Name N. S. Hakey Attorney for Applicant

Each Applicant for federal assistance to be awarded by FTA must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its electronic signature in lieu of the Attorney's signature within TrAMS, provided the Applicant has on file and uploaded to TrAMS this hard-copy Affirmation, signed by the attorney and dated this federal fiscal year.

4. SERVICE POLICY ANALYSIS & SERVICE STANDARDS

TITLE VI PROGRAM ANALYSIS

BACKGROUND

The Federal Transit Administration (FTA) *requires* that the RTA prepare and submit a Title VI Program for compliance with the reporting requirements of 49 CFR Section 21.9(b). The Title VI Program must be approved by the Board of Commissioners who is responsible for the policy decisions at the RTA. The submittal includes a copy of the board resolution as evidence that the board has approved the Title VI Program. The FTA will review the submittal and request additional information from the recipient as needed. The submittal shall be submitted to the FTA regional civil rights officer using the Transit Award Management System (TrAMS).

CONTENTS OF TITLE VI PROGRAM

The Title VI Program shall address the general requirements set out in Section 4 of Chapter III of FTA Circular 4702.1B and the system-wide service standards and policies described in the chapter itself. The following general requirements apply:

- *Section 21.5 states the general prohibition of discrimination on the grounds of race, color, or national origin.*
- *Section 21.5(b)(2) specifies that a recipient shall not “utilize criteria or methods of administration which have the effect of subjecting persons to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular race, color, or national origin.”*
- *Section 21.5(b)(7) requires recipients to “take affirmative action to assure that no person is excluded from participation in or denied the benefits of the program or activity on the grounds of race, color, or national origin.”*
- *Section (3)(iii) of Appendix C states that “[n]o 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.”*

Demographic and Service Profile Maps and Charts.

In order to comply with FTA Title VI requirements, the RTA performed a service policy analysis as described in FTA Circular 4702.1B using available data from the U.S. Census, the RPC, and the City of New Orleans combined with RTA data sets and reports.

The RTA operates transit service in Orleans Parish and the City of Kenner, which is located in adjacent Jefferson Parish, Louisiana. The service area includes the Mississippi River and Lake Pontchartrain; therefore, the RTA operates ferry services on the Mississippi River. Map 1 shows the RTA service areas and the transit and fixed guideway routes that comprise the system. A ¼ mile buffer of each route is also shown. The 2019 U.S. Census block demographics are displayed.

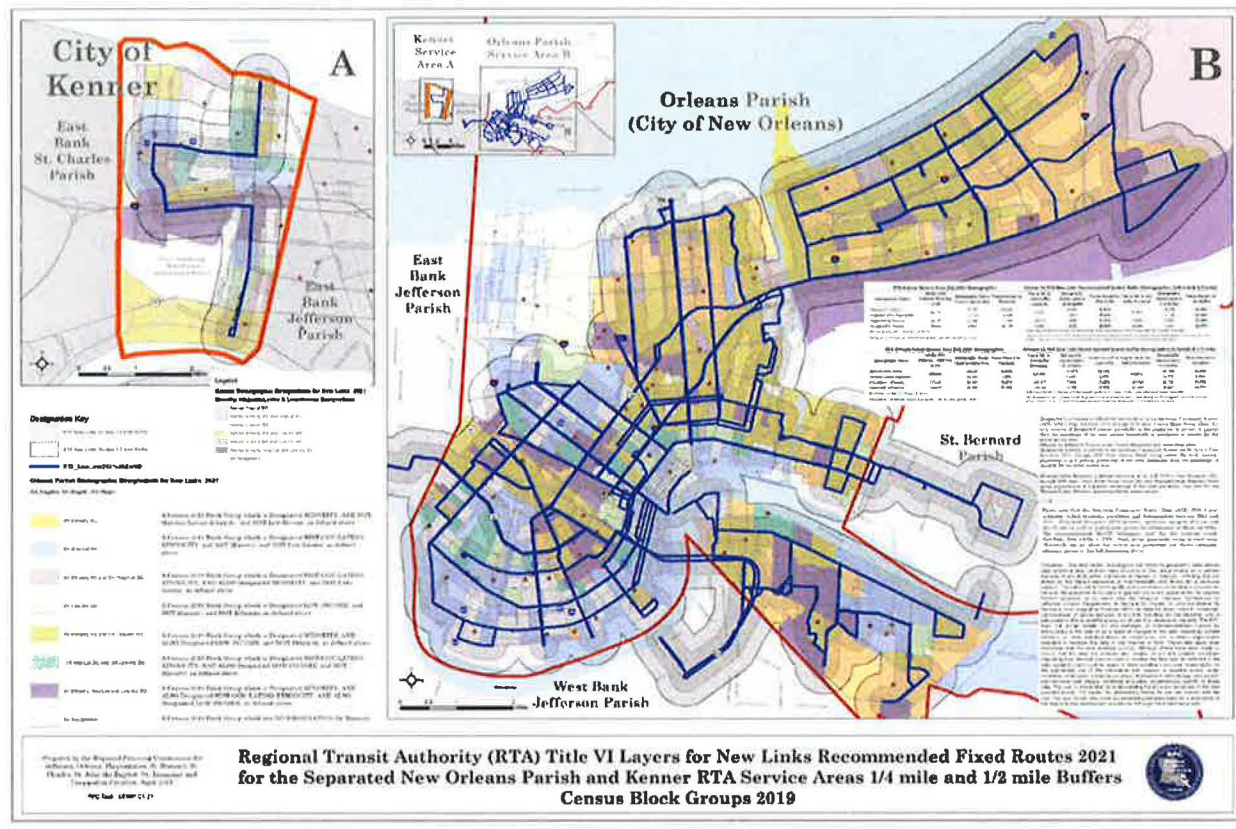
Map 2 identifies census blocks where the minority population residing in the census block exceeds the Orleans Parish minority average of 66% and in the City of Kenner where minority average exceeds 36%. The census blocks are displayed with the existing transit and fixed guideway routes. These minority census blocks served as the base for identifying minority routes. Using GIS, the transit routes and fixed guideways layer was clipped using the minority blocks within ¼ mile of a route. The resulting layer consists of the segments of routes that pass-through minority blocks. The lengths of the minority segments were added together by route and in instances where more than 1/3 of an entire route length was comprised of minority segments, the line was identified as a minority line using the federal definition.

Map 3 depicts Census Blocks where the total low-income population exceeds the average low-income population.

Table 1: Federally Defined Minority Transit Routes (FTA C 4702.1B)

| | | | |
|-----|-----------------|------|--------------------|
| 4 | Chalmette Ferry | 68 | Little Woods Loop |
| 17 | MLK Hollygrove | 73 | Michoud Loop |
| 39 | Tulane | 80 | Desire-Louisa |
| 52A | St. Bernard | 84 | Galvez |
| 52B | St. Bernard | 86 | Barracks-Chalmette |
| 55 | Elysian Fields | 94 | Broad |
| 57 | Franklin | 100 | Algiers Gretna |
| 61 | Lake Forest | 105 | Algiers Local |
| 62 | Morrison | 114A | Garden Oaks Kabel |
| 62o | Morrison Owl | 114B | Garden Oaks Tullis |
| 66 | Hayne Loop | 201 | Kenner Local |

Map 1: The RTA service area, ¼ mile buffer, and census demographics.



Map 2: U.S. Minority Census Blocks (where the total minority population exceeds the average minority population as defined in FTA C 4702.1B).



Map 3: U.S. Low Income Census Blocks (where the total low-income population exceeds the average low-income population as defined in FTA C 4702.1B).



SERVICE STANDARDS ANALYSIS

In order to comply with FTA Title VI requirements, the RTA annually performs a review of its' service standards as described in FTA Circular 4702.1B using available data from the U.S. Census, the RPC, and the City of New Orleans and RTA data sets and reports.

- *Vehicle load for each mode:* Generally expressed as the ratio of passengers to the number of seats on a vehicle, relative to the vehicle's maximum load point (Table 2).
- *Vehicle headways for each mode:* The amount of time between two vehicles traveling in the same direction on a given line or combination of lines. This is also known as service frequency. (Table 3).
- *Service availability for each mode:* A general measure of the distribution of routes within an agency's service area (Table 4).

Table 2: Passenger Load Guidelines

| | Express | Rapid | Select | Local | Circulator | Flex | Ferry |
|---|---------|-------|--------|-------|------------|------|-------|
| Average Passenger Load Maximum (percent of seated capacity) | | | | | | | |
| Daily Peak: | 100% | 125% | 125% | 125% | 125% | 125% | 150% |
| Daily Off-Peak: | 100% | 100% | 100% | 100% | 100% | 100% | 125% |

Discussion: Vehicle Load

Passenger loads are measured to identify overcrowded services as candidates for increased investment. Overcrowding is a problem because vehicles may pass up riders waiting at stops if the vehicle has reached its passenger capacity, riders may choose not to ride if other transportation options are available, and overcrowded vehicles often run late because it takes longer for riders to board and get off at stops.

Passenger loads are measured by computing the load factor, which is the number of passengers onboard a vehicle divided by the seated capacity of the vehicle. For example, a transit vehicle carrying a full seated load with no standees has a load factor of 100%. The vehicle load standard is calculated as an average for both the peak and off-peak periods, at the busiest point on the route during the busiest hour. For instance, if a service operates at a 15-minute frequency, then 4 vehicles would pass the busiest point in an hour. The average number of passengers for these 4 vehicles must fall within the service standards, even though any one vehicle may be more crowded than the average. If the standard is consistently exceeded, RTA should evaluate options to alleviate overcrowding. However, the standards are designed to allow standees during peak periods on a regular basis.

If these guidelines are consistently exceeded for a route, two different techniques are used to increase capacity and keep passenger loads within acceptable levels:

The first is to assign a larger vehicle to the trip, if one is available. The second method is to provide more frequent service to better match demand. (In limited cases, capacity can also be added by operating some vehicles in tandem, which is referred to as “double-heading.”)

As with the other guidelines in this document, the guidelines as shown in the Passenger Load Guidelines are general, not strict standards. These guidelines will be used for developing services levels that best meet the needs of RTA’s current and future riders and to ensure that riders are not discouraged by overcrowding. These guidelines are based on RTA vehicle capacities and transit industry standards, and are designed to balance safety, passenger comfort, and operating efficiency.

Discussion: Vehicle Utilization and Headways (Service Frequency)

Service frequency, or headways, refers to the time interval between two vehicles traveling in the same direction on the same route. Frequency has a major influence on transit usefulness and its ridership; high frequency service is a fundamental requirement for attractive service. At the same time, frequency has a significant impact on operating costs, and service resource requirements increase with improvements in service frequency.

The frequency on a route is determined by demand and policy. Routes serving corridors with higher ridership demand warrant higher frequency service (more vehicles per hour, where vehicles come more often), while routes serving corridors with lower ridership demand warrant lower frequency service (fewer vehicles per hour, where vehicles come less often). Also, the delineation of minimum service frequencies is a policy decision that gives long-term consistency to the system and helps riders better understand and use the system. The service frequency minimums are used to balance passenger convenience, resources, and costs. (see Table 3).

- Minimum headway guidelines are often used to specify a minimum level of service that should be operated on low ridership lines or during off-peak periods. Service frequency could be higher on heavy ridership lines where the level of service operated is more a function of passenger demand and vehicle loading guidelines.
- No route should operate at a lower frequency than every 60 minutes at any time (i.e. transit vehicles should come at least once every hour).
- Lines with frequencies between 10 and 60 minutes should operate on clockface headways whenever practicable. A clockface headway is any frequency that is evenly divisible into 60 minutes, such as 12, 15, 20, 30, or 60 minutes. Non-clockface headways are permissible when headways are less than 10 minutes, the route is frequent enough that there is no benefit gained from clockface vs non-clockface headways.
- For routes with mixed service levels, the service frequency guidelines apply to the route's predominant segment with the higher service level, though ideally all segments have consistent service levels for simplicity.

Table 3: Service Frequency Guidelines – Minimum Headways in minutes

| | Express | Rapid | Select | Local | Circulator | Flex | Ferry |
|---------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| Weekdays Peak: Off-Peak: | 30 minutes 30 minutes | 20 minutes 30 minutes | 30 minutes 30 minutes | 60 minutes 60 minutes | 60 minutes 60 minutes | 60 minutes 60 minutes | 60 minutes 60 minutes |
| Saturdays Peak: Off-Peak: | 30 minutes 30 minutes | 30 minutes 30 minutes | 30 minutes 30 minutes | 60 minutes 60 minutes | 60 minutes 60 minutes | 60 minutes 60 minutes | 60 minutes 60 minutes |
| Sundays Peak: Off-Peak: | 60 minutes 60 minutes | 40 minutes 60 minutes | 60 minutes 60 minutes | 60 minutes 60 minutes | 60 minutes 60 minutes | 60 minutes 60 minutes | 60 minutes 60 minutes |

Service frequency on a route may be adjusted based on the actual ridership and passenger loads experienced. High passenger loads may result in an increase in service frequency. Low passenger loads may result in a reduction in frequency. The adjustment of service will be based on an assessment of ridership and passenger loads for a route.

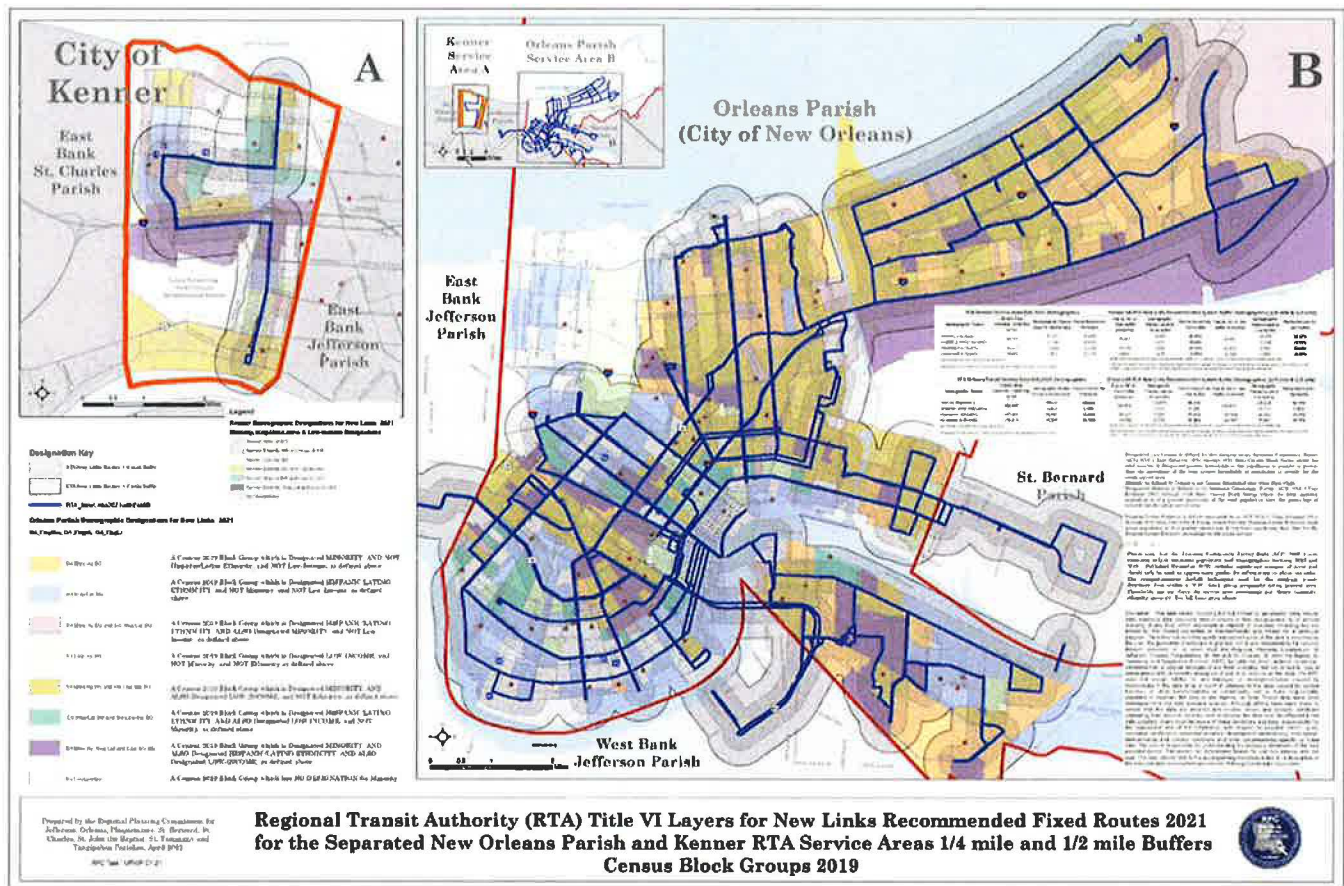
Access to Service

Table 4 presents access to transit within $\frac{1}{4}$ and $\frac{1}{2}$ miles for minority and non-minority populations. Based upon this review 70% of people living in New Orleans and Kenner have access to transit within a $\frac{1}{4}$ mile of their home and 73% within a $\frac{1}{2}$ mile of their home. The minority population has slightly higher level of access for both a $\frac{1}{4}$ mile and half mile buffer.

Table 4: Transit Access for Minority Populations - $\frac{1}{4}$ mile of route, and $\frac{1}{2}$ mile of route.

| RTA Service Area 2021 Demographics | | | | RTA New Links Recommended System Buffer Demographics (1/4 mile & 1/2 mile) | | | | | |
|--|--|---|--------------------------------|--|--|--------------------------------|-------------------------------------|---|-------------------------------|
| Demographic Theme | Service Area Universe: Total Pop or HH | Demographic Theme Count in Service Area | Theme Percent for SA Threshold | Pop or HH in .25mi buffer (Universe) | Demographic Theme Count in .25 mi buffer | Theme Percent for .25mi buffer | Pop or HH in .5mi buffer (Universe) | Demographic Theme Count in .5 mi buffer | Theme Percent for .5mi buffer |
| Minority Population | 457,622 | 281,999 | 61.62% | 337,894 | 223,880 | 66.26% | 406,802 | 266,387 | 65.48% |
| Hispanic/Latino Population | | 38,529 | 8.42% | | 24,506 | 7.25% | | 32,317 | 7.94% |
| Population in Poverty | 443,932 | 100,809 | 22.71% | 326,054 | 82,130 | 25.19% | 393,474 | 95,656 | 24.31% |
| Households in Poverty | 178,710 | 40,453 | 22.64% | 133,335 | 33,402 | 25.05% | 159,230 | 38,451 | 24.15% |
| Service Area sums totals for Orleans Parish and the City of Kenner. | | | | Buffer Area sums totals for RTA New Links Recommended System 2021 graduated in ArcGIS in local State Plane Projection NAD83 feet. | | | | | |
| Demographics from American Community Survey (ACS) 5-Year Estimates (2015 thru 2019). | | | | Tabulate intersection tool in ArcGIS computes the percent intersection between two feature classes (black group ACS demographics and system dissolved buffers - 1/4 mile and 1/2 mile) and cross tabulates the statistics based upon the percent area of the black group intersection. | | | | | |

Map 6: Service availability for each route (¼ and ½ mile buffers).



VEHICLE ASSIGNMENT

Equipment shall be assigned to specific routes and trips according to the following guidelines. These guidelines may be modified if operations and scheduling needs require. The RTA's vehicle assignment methods facilitate compliance with RTA and Title VI standards, assures vehicles purchased meet minimum standards and create efficiencies and improve flexibility in the deployment/reassignment of vehicles to the extent feasible. In select situations, a specific bus type or size is assigned to a route or geographic area.

RTA has two bus garages, one streetcar station and two ferry terminals. The entire system of fixed, rail, paratransit and ferry routes operate out these locations.

27- to 35-foot Buses

Appropriate for lower volume routes where ridership does not require a standard bus, or for routes where specific operating concerns preclude use of a standard buses. May also be used for Flex services.

40-foot

The standard equipment for local, select, rapid, and express services.

Articulated Buses

Appropriate for high volume routes. Not all New Orleans streets are capable of accommodating the length and turning radius of these vehicles; therefore, their use on these routes are most feasible. The routes utilizing 60-foot articulated buses are minority and low income.

Small Paratransit Buses and Vans

Smaller buses and vans are solely used for paratransit trips. Attempts are made to assign ambulatory clients to vans whenever possible; however, bus vs. van assignments are based upon other factors as well. These include the number of clients to be picked up, whether they are accompanied by a PCA and the number of wheelchairs client pick-ups within the trip. Those trips that will need more space due to number of clients and/or wheelchairs are assigned buses.

Ferries

The RTA currently has 5 ferry vessels. The Col. Frank X. Armiger, Capt. Neville Levy, Thomas Jefferson, RTA1 and RTA2. The vessels are assigned based upon type and nature of service. The Levy and Jefferson are vehicle and passenger carriers with a vehicle capacity of 60 and 50, respectively. The lower Algiers/Chalmette landing is utilized for mainly vehicle traffic, so the Levy and Jefferson are used. The Armiger, RTA1 and RTA2 are passenger only vessels with a passenger capacity of 346, 149 and 149, respectively. The Algiers/Canal Street landing provides no vehicle service so the Armiger, RTA1 and RTA2 are used solely at this location.

Title VI Evaluation

Bus age is used as the standard measure for determining equitable vehicle. The average age of vehicles assigned to predominantly minority and/or low-income routes should be approximately equal to the average age of vehicles assigned to non-minority and/or non-low-income routes.

5. TITLE VI EQUITY ANALYSIS – NEW LINKS REDESIGN

[..\2022.08.04 - New Links Redesign - Title VI Equity Analysis.pdf](#)



Regional Transit Authority
2817 Canal Street
New Orleans, LA 70119-6301
www.norta.com

RESOLUTION NO. 23-021

STATE OF LOUISIANA

PARISH OF ORLEANS

Title VI of the Civil Rights Act of 1964

Introduced by Commissioner Ewell, seconded by Commissioner LeBeouf.

WHEREAS, the Regional Transit Authority (RTA) will ensure non-discrimination and equity in the provision of transit services in accordance with Title VI of the Civil Rights Act and Federal Transit Authority (FTA) Circular 4702.1b; and

WHEREAS, the FTA requires an updated Title VI Policy and Program on a triennial basis; and

WHEREAS, the FTA requires that the RTA ensure the significant and meaningful input of citizens, including minority and low-income citizens in the development of the Title VI Program; and

WHEREAS, the Board of Commissioners of the RTA must approve the Title VI Policy and Program contingent upon any amendments necessitated by the FTA; and

NOW, THEREFORE, BE IT RESOLVED that the Board of Commissioners of the Regional Transit Authority hereby approves the attached Title VI Policy and Program for compliance with the FTA requirements.

THE FOREGOING WAS READ IN FULL; THE ROLL WAS CALLED ON THE ADOPTION THEREOF AND RESULTED AS FOLLOWS:

| | |
|----------|----------|
| YEAS: | <u>6</u> |
| NAYS: | <u>0</u> |
| ABSTAIN: | <u>0</u> |
| ABSENT: | <u>1</u> |

AND THE RESOLUTION WAS ADOPTED ON THE 28th DAY OF MARCH, 2023.

MARK RAYMOND
CHAIRMAN
RTA BOARD OF COMMISSIONERS