



Loudoun County Transit 2020-2023 Title VI Program

Fall 2019

Prepared for:

Loudoun County Department of Transportation & Capital Infrastructure

With technical assistance from:



Table of Contents

Loudoun County Board of Supervisors Approval of Title VI Program.....	7
Loudoun County Board of Supervisors Approval of Transit Service Monitoring	7
Loudoun County Board of Supervisors Approval of Major Service Change, Disparate Impact, and Disproportionate Burden Policies.....	7
Introduction	9
Title VI Program Defined	9
Basis for County’s Title VI Program.....	9
Funding Partners.....	9
Civil Rights Practices.....	10
General Requirements and Guidelines	11
Title VI Notices and Assurances to the Public.....	11
Notice to Beneficiaries of Protection Under Title VI.....	12
Title VI Notice Locations	15
Overview of Complaint Procedures	15
Title VI Complaint Form	19
Public Transportation-Related Title VI Investigations, Complaints, or Lawsuits	22
Minority Representation on Planning and Advisory Bodies	22
Subrecipient Compliance with Title VI	23
Title VI Equity Analysis for Facilities.....	23
Public Participation Plan	24
Introduction and Goals	24
Overview of Outreach Strategies	24
Examples of Public Outreach Efforts.....	28
Transit Advisory Board Meeting	28
Spanish Speaking Outreach (Sterling Library).....	28
Service Changes	29
Service Area Profile	31
Loudoun County Transit.....	31
Fares.....	34
Regional Transit	35
Loudoun County Demographic Maps	36
Loudoun County Transit Ridership Profile	39
Race/Ethnicity of Loudoun County DTCI Riders.....	39

Income Levels of Loudoun County DTCI Riders	41
Native Language and English Proficiency.....	43
Alternative Trip Mode and Vehicle Availability	44
Fare Payment	46
Language Access Plan	47
Introduction	47
Four Factor Analysis	47
Methodology.....	49
Four Factor Analysis Results	50
Factor 1	50
Factor 2	57
Factor 3	58
Factor 4	61
Language Access Plan & Monitoring, Evaluating and Implementation	68
Requirements for Fixed Route Transit Providers.....	69
Transit Service Standards and Policies.....	69
Vehicle Load	69
Vehicle Headway.....	70
On-Time Performance.....	70
Service Availability	71
Transit Amenities	74
Vehicle Assignment.....	74
Transit Service Monitoring.....	75
Minority Routes	75
Analysis of Service Standards and Policies Performance by Route Classification	78
Monitoring Findings	87
Evaluating Service and Fare Changes.....	89
Major Service Change Policy	89
Disparate Impact and Disproportionate Burden Polices	90
Service Equity and Fare Equity Analyses.....	91
Appendix A: Language Access Plan Maps (Concentrations of Linguistically Isolated Safe Harbor Language Speakers).....	92
Appendix B: Equity Analyses for Service and Fare Changes (Approved separately; this appendix added for package submission to FTA if required.)	100

List of Figures

Figure 1: Loudoun County DTCI Service Types.....	31
Figure 2: Population Density in Loudoun County	36
Figure 3: Minority Population in Loudoun County.....	37
Figure 4: Low-Income Households in Loudoun County	38
Figure 5: Alternative Trip Mode by Race/Ethnicity (Local Bus)	44
Figure 6: Alternative Trip Mode by Race/Ethnicity (Commuter Bus)	45
Figure 7: Average Bus Age on Minority Vs. Non-Minority Commuter Bus Runs	87
Figure 8: Linguistically Isolated Arabic Speakers as a Percentage of Total Population By Census Tract.....	92
Figure 9: Linguistically Isolated Chinese Speakers as a Percentage of Total Population By Census Tract.....	93
Figure 10: Linguistically Isolated French (Including Haitian/Cajun) Speakers as a Percentage of Total Population By Census Tract.....	94
Figure 11: Linguistically Isolated Other Indo-European Language Speakers as a Percentage of Total Population By Census Tract	95
Figure 12: Linguistically Isolated Korean Speakers as a Percentage of Total Population By Census Tract.....	96
Figure 13: Linguistically Isolated Russian/Polish/Slavic Speakers as a Percentage of Total Population By Census Tract ...	97
Figure 14: Linguistically Isolated Spanish Speakers as a Percentage of Total Population By Census Tract.....	98
Figure 15: Linguistically Isolated Vietnamese Speakers as a Percentage of Total Population By Census Tract	99

List of Tables

Table 1: Loudoun County Transit Advisory Board Race and Ethnicity Breakdown.....	23
Table 2: Outreach Events Over Time Period of Most Recent Title VI Program	28
Table 3: DTCL Service Changes, 2017 – 2020	29
Table 4: Loudoun County DTCL Bus Service	32
Table 5: Loudoun County Bus Fares.....	34
Table 6: Additional Fixed Route Bus Service in Loudoun County	35
Table 7: Race/Ethnicity of Loudoun County DTCL Riders (Rider Survey)	39
Table 8: Percent Minority By Local Bus Route (Rider Survey)	39
Table 9: Percent Minority by Commuter Bus Run (Rider Survey – only available for routes below)	40
Table 10: Race/Ethnicity - Loudoun County (American Community Survey, 2013-2017)	40
Table 11: Low Income Loudoun County DTCL Riders (Rider Survey).....	41
Table 12: Household Income of Loudoun County DTCL Riders (Rider Survey).....	41
Table 13: Percent Low-Income by Local Bus Route (Rider Survey).....	42
Table 14: Percent Low-Income by Commuter Bus Run (Rider Survey).....	42
Table 15: Household Income - Loudoun County (American Community Survey, 2013-2017)	42
Table 16: English Use at Home – Rider Survey (“Do you speak a language other than English at home?”)	43
Table 17: English Ability – Rider Survey (“How well do you speak English?”)	43
Table 18: Top Five Languages Spoken at Home By LEP Respondents – Local Bus.....	43
Table 19: Top Five Languages Spoken at Home By LEP Respondents – Commuter Bus	43
Table 20: Local Bus – Alternative Trip Mode (“How would you make this trip if this bus were not available?”).....	44
Table 21: Commuter Bus – Alternative Trip Mode (“How would you make this trip if this bus were not available?”)	45
Table 22: Local Bus – Number of Usable Vehicles at Home	46
Table 23: Local Bus – Availability of Usable Vehicle to Make the Trip Today.....	46
Table 24: Local Bus – Fare Media.....	46
Table 25: Commuter Bus – Fare Media.....	46
Table 26: Language Access Plan Methodology	49
Table 27: Language Spoken at Home by Limited English-Speaking Status	51
Table 28: Top Home Languages in Loudoun County.....	52
Table 29: Language Spoken at Home by Ability to Speak English, Population 5 Years and Older.....	54
Table 30: Do you speak a language other than English at home?	54
Table 31: How well do you speak English?	55
Table 32: Top Languages Spoken at Home for those who do not speak English “well” (Local Bus)	55
Table 33: Top Languages Spoken at Home for those who do not speak English “well” (Commuter Bus)	55
Table 34: Frequency with which Trip is Made on Local Bus (LEP Respondents)	57
Table 35: Frequency with which Trip is Made on Commuter Bus (LEP Respondents)	57
Table 36: LEP Respondents’ Alternative Trip Mode for Local Bus Riders	58
Table 37: LEP Vehicle Availability for Local Bus Riders	59
Table 38: LEP Trip Purpose for Local Bus Riders	59
Table 39: LEP Respondents’ Alternative Trip Mode for Commuter Bus Riders	60
Table 40: LEP Trip Purpose for Commuter Bus Riders	60
Table 41: Recommended Language Access Strategies	64
Table 42: LCT Commuter and Local Bus Vehicles.....	69
Table 43: DTCL Transit Service Standards: Vehicle Load, Vehicle Headways, and On-Time Performance	71
Table 44: County Park-and-Ride Lot Utilization	72

Table 45: Minority and Non-Minority Runs by Run Origin for Commuter Bus..... 76

Table 46: Local Bus Minority Route Status 76

Table 47: Minority and Non-Minority Route / Run Classifications for Commuter Bus and Local Bus..... 78

Table 48: Average Headway on Commuter Bus Runs (Published)..... 79

Table 49: Local Bus Published Headways..... 81

Table 50: Loudoun County Park-and-Ride Lot Utilization 83

Table 51: Park and Ride Lots and Available Transit Amenities 85

Loudoun County Board of Supervisors Approval of Title VI Program

Loudoun County Board of Supervisors Approval of Transit Service Monitoring

Loudoun County Board of Supervisors Approval of Major Service Change, Disparate Impact, and Disproportionate Burden Policies

A copy of the Board of Supervisors' approvals is provided on the next page.



Loudoun County, Virginia

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Office of the County Administrator

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Telephone (703) 777-0200 • Fax (703) 777-0325

At a business meeting of the Board of Supervisors of Loudoun County, Virginia, held in the County Government Center, Board of Supervisors' Meeting Room, 1 Harrison St., S.E., Leesburg, Virginia, on Tuesday December 3, 2019 at 5:00 p.m.

IN RE: Loudoun County Transit 2020-2023 Title VI (Six) Program (Countywide):

Vice Chairman Buona moved that the Board of Supervisors acknowledge their awareness and consideration of the Loudoun County Transit 2020-2023 Title VI Program, and approve the 2020-2023 Program as presented within in the December 3, 2019, Board of Supervisors Business Meeting Action Item.

Vice Chairman Buona further moved that the Board of Supervisors acknowledge their awareness and consideration of the results of the monitoring program of service standards and policies, and approve the Monitoring Results as presented within the Loudoun County Transit 2020-2023 Title VI Program included in the December 3, 2019, Board of Supervisors Business Meeting Action Item.

Vice Chairman Buona further moved that the Board of Supervisors acknowledge their awareness and consideration of the Major Service Change Policy, the Disparate Impact Policy, and the Disproportionate Burden Policy as presented within the Loudoun County Transit 2020-2023 Title VI Program included in the December 3, 2019, Board of Supervisors Business meeting Action Item.

Seconded by Supervisor Volpe.

Voting on the Motion: Supervisors Buffington, Buona, Higgins, Meyer, Randall, Saines, Umstattd, and Volpe – Yes; None -No; Supervisor Letourneau – Absent for the vote.

COPY TESTE:



DEPUTY CLERK FOR THE LOUDOUN
COUNTY BOARD OF SUPERVISORS

Introduction

Title VI Program Defined

This Title VI Program document was developed by Loudoun County's Department of Transportation and Capital Infrastructure (DTCI), with technical support from Foursquare Integrated Transportation Planning. This report provides the transit policies, service standards, and monitoring results to demonstrate how the County complies with the Federal Transit Administration (FTA) guidance for Title VI of the Civil Rights Act of 1964. Section 601 of Title VI of the Civil Rights Act of 1964 states the following:

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.

The Civil Rights Restoration Act of 1987 clarified the broad, institution-wide application of Title VI. Title VI applies to all operations of covered entities without regard to whether specific portions of the program or activity are federally funded. The term "program or activity" means all of the operations of a department, agency, special purpose district, or government; or the entity of such a state or local government that distributes such assistance and each such department or agency to which the assistance is extended, in the case of assistance to a state or local government.

The County, as a past recipient and future applicant of federal transportation funding, has updated its three-year Title VI Program in accordance with the guidelines of FTA Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients (October 2012).

Basis for County's Title VI Program

In 2014, DTCI submitted its first Title VI Program to the Federal Transit Administration. Loudoun County was applying to receive credit assistance from the Transportation Infrastructure Finance and Innovation Act (TIFIA) program for construction of Phase 2 of the Dulles Corridor Metrorail Project, also known as the Metrorail Silver Line. In 2015, DTCI assumed operation of the local bus service formerly operated in Loudoun County by Virginia Regional Transit. The addition of local bus service brought the total number of vehicles in DTCI's fleet to greater than 50 vehicles in peak period service, which is a threshold established in FTA C 4702.1B that introduces additional Title VI Program requirements. The 2017-2020 Title VI Program incorporated those additional FTA program elements. This 2020-2023 Title VI Program update provides an opportunity to take a comprehensive look at the policies and standards for equitable service based on implementation of the Title VI Program.

Funding Partners

While this Program references the introduction of Metrorail into Loudoun County, this Program addresses the County's compliance with Title VI and additional actions that will be introduced into the administrative and operational aspects of the County's transit services, including both Commuter Bus and Local Bus service.

2020-2023 Title VI Program

Loudoun County, Virginia, is one of four jurisdictional funding partners in the planning, design, and funding of Phase 2 of the Dulles Corridor Metrorail Project. The funding partners are: Virginia Department of Transportation, Metropolitan Washington Airports Authority (MWAA), Loudoun County, and Fairfax County. The funding partners for Phase 2 of the Dulles Corridor Metrorail Project that received TIFIA credit assistance include: Loudoun County, Fairfax County, and MWAA.

As of December 2018, Loudoun County had received its final TIFIA loan distribution. On May 14, 2019, the Federal Transit Administration's Acting Regional Civil Rights Officer for Region III determined that Loudoun County was no longer required to submit Title VI Program Updates to the FTA. However, Loudoun County was advised to ensure Title VI protections for the life of the investment built with federal funds and to be aware that future program reviews may be necessary should Loudoun become a primary or sub-recipient.

Civil Rights Practices

This Program details how DTCL incorporates nondiscrimination policies and practices in the management and operation of its transit services. DTCL's Title VI policies and procedures are documented in this Program.

2020-2023 Title VI Program

General Requirements and Guidelines

This section addresses all Title VI general requirements and guidelines, as noted in FTA C 4702.1B.

Title VI Notices and Assurances to the Public

Loudoun County presents the following Title VI Compliance Notice to its constituency.

Notice to Beneficiaries of Protection Under Title VI

Title VI Compliance



Notice to Beneficiaries of Protection under Title VI Loudoun County Transit

Loudoun County, Virginia, operates its transit programs and transit services with conviction that *no* person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity operated by Loudoun County Transit, including the denial of meaningful access for limited English proficient (LEP) persons, in accordance with Title VI of the Civil Rights Act. For more information on Loudoun County Transit's civil rights program and the procedures to file a complaint, please contact 877-465-2287 (877-GO-LCBUS) or email transitcomments@loudoun.gov.

The complaint should include the following information:

- Name;
- Address;
- Contact information (i.e., telephone number, email address, etc.);
- How, when, where, and why you believe you were discriminated against; and
- The location, names, and contact information of any witnesses.

The complaint may be filed in writing to:

Loudoun County, Virginia
Department of Transportation and Capital Infrastructure
Attn: Title VI Manager
P.O. Box 7500, MSC #64
Leesburg, Virginia 20177

A complainant may file a complaint directly with the Federal Transit Administration Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor – TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

For language assistance with Loudoun County Transit or to request a translation of this document in another language, please phone 877-465-2287 (877-GO-LCBUS) Monday through Friday, 8:30 AM – 5:00 PM, excluding holidays, or visit our website www.loudoun.gov/transit.

Arabic:

للحصول على المساعدة اللغوية من ترانسيت مقاطعة لودون، أو لطلب ترجمة هذه الوثيقة بلغة أخرى، يرجى الاتصال هاتفياً على الرقم **877-465-2287 (877-GO-LCBUS)** من الاثنين إلى الجمعة، من الساعة 8:30 صباحاً حتى 5:00 مساءً ما عدا أيام العطل، أو قم بزيارة موقعنا على الإنترنت www.loudoun.gov/transit.

French: Pour bénéficier d'une assistance linguistique auprès du service Loudoun County Transit ou pour demander une traduction de ce document dans une autre langue, veuillez composer le **877-465-2287 (877-GO-LCBUS)** du lundi au vendredi, de 8h30 à 17h00, en dehors des jours fériés, ou consulter notre site Web à l'adresse www.loudoun.gov/transit.

Tagalog: Para sa tulong sa wika sa Loudoun County Transit o para humiling ng pagsasalin ng dokumentong ito sa ibang wika, tumawag sa **877-465-2287 (877-GO-LCBUS)** Lunes hanggang Biyernes, 8:30 AM – 5:00 PM, maliban sa mga holiday, o bisitahin ang aming website www.loudoun.gov/transit.

Yoruba: Fun iranlowo ni'pa ede pelu Loudoun County Transit t'abi l'ati se itumo iwe yii si ede miran, e pe wa si **877-465-2287 (877-GO-LCBUS)** Lati aaro ojo Aje ti ti di irole ojo Eti; laarin aago mejo-abo aaro si aago marun irole, y'ato si ojo isimin gbogboogbo; t'abi ki e se abewo si ero ayelujara wa www.loudoun.gov/transit.

Chinese: 如需获得有关劳登县交通运输系统 (Loudoun County Transit) 的语言帮助或者需要本文档的其他语言译本，请在周一至周五上午 8:30 至下午 5:00（节假日除外）致电 **877-465-2287 (877-GO-LCBUS)** 或者访问我们的网站 www.loudoun.gov/transit。

Vietnamese: Để được hỗ trợ ngôn ngữ với Loudoun County Transit hoặc muốn yêu cầu một bản phiên dịch của văn kiện này sang một ngôn ngữ khác, xin vui lòng điện thoại đến số **877-465-2287 (877-GO-LCBUS)** từ Thứ Hai đến Thứ Sáu, từ 8:30 giờ sáng đến 5 giờ chiều, ngoại trừ những ngày lễ, hoặc vào xem trang mạng www.loudoun.gov/transit của chúng tôi.

Hindi: लूडून काउंटी परिवहन में भाषा सहायता के लिए या किसी अन्य भाषा में इस दस्तावेज के अनुवाद की माँग करने के लिए, कृपया छुट्टी के दिनों को छोड़कर, सोमवार से शुक्रवार सुबह 8:30 बजे से शाम 5:00 बजे तक **877-465-2287 (877-GO-LCBUS)** पर कॉल करें, या हमारी वेबसाइट www.loudoun.gov/transit पर जाएँ।

Telegu: లుడునౌన్ కౌంటీ ట్రాన్స్పోర్టేషన్ భాషా సహాయత కొరకు, లోక వారొక భాషలో ఈ పత్రం యొక్క అనువాదాన్ని అభ్యర్థించడానికి, దయచేసి ఫోన్ చేయండి - **877-465-2287 (877-GO-LCBUS)** సోమవారం నుండి శుక్రవారం వరకు సోలమ దినాలలో కాక మిగిలిన అనెస్ రోజులలో, ఉ. **8:30** నుండి - స. **5:00** వరకు, లోక దయచేసి మా వాబ్ సైట్ ను సంప్రదించండి - www.loudoun.gov/transit.

Farsi:

اگر در ترانزیت لادون کانتی (Loudoun County Transit) نیاز به مترجم دارید، و یا درخواست ترجمه این متن به زبان دیگری را دارید، لطفاً با شماره تلفن 877-465-2287 (877-GO-LCBUS)، در روزهای دوشنبه تا جمعه بین ساعت 8:30 صبح تا 5:00 بعد از ظهر، به استثنای تعطیلات رسمی، تماس بگیرید و یا به وب سایت ما مراجعه کنید. www.loudoun.gov/transit

Korean: Loudoun 카운티 교통 체계에 대한 언어 지원이나 다른 언어로 된 이 문서의 번역본을 원하시면 877-465-2287 번으로 전화 주시거나 (877-GO-LCBUS) 월-금 8:30 AM – 5:00 PM, 공휴일 제외 저희 웹사이트 www.loudoun.gov/transit 를 방문해 주십시오.

Urdu:

لاؤڈون کاؤنٹی ٹرانزٹ کے ساتھ زبان کی معاونت کے لئے یا اس دستاویز کے دوسری زبان میں ترجمے کے لئے برائے مہربانی سوموار سے جمعہ کو صبح 8:30 سے شام 5:00 تک، علاوہ تعطیلات کے، 877-465-2287 (877-GO-LCBUS) پر فون کریں یا ہماری ویب سائٹ www.loudoun.gov/transit ملاحظہ کریں۔

2020-2023 Title VI Program

Title VI Notice Locations

The Title VI Notice is currently posted in the following places:

- Loudoun County Department of Transportation and Capital Infrastructure Offices: 101 Blue Seal Drive, Suite 102, Leesburg, VA 20175.
- On the Loudoun County Transit website at: <https://www.loudoun.gov/4052/Compliance>.
- On all Loudoun County Transit Commuter and Local Buses.

Overview of Complaint Procedures

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964 as amended, and the Civil Rights Restoration Act of 1987, relating to any program or activity administered by the Loudoun County Department of Transportation and Capital Infrastructure, as well as to sub-recipients, consultants, and/or contractors. Intimidation or retaliation of any kind is prohibited by law. These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination.

These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meetings(s) between the affected parties and the Title VI Manager may be utilized for resolution.

The Title VI Manager, in cooperation with the County Attorney, will make every effort to pursue a resolution to the complaint. Initial interviews with the complainant and the respondent will request information regarding specifically requested relief and settlement opportunities.

Procedures

1. Any individual, group of individuals or entity who believes that he/she has been subjected to discrimination by Loudoun County Transit on the basis of race, color, or national origin may file a written complaint with Loudoun County Transit's Title VI Manager. The complaint is to be filed in the following manner:
 - a. A formal complaint must be filed within 180 calendar days of the alleged occurrence.
 - b. The complaint shall be in writing and signed by the complainant(s).
 - c. The complaint should include:
 - i. the complainant's name, address, and contact information (i.e., telephone number, email address, etc.);
 - ii. the date(s) of the alleged act of discrimination (if multiple days, include the date when the complainant(s) became aware of the alleged discrimination and the date on which the alleged discrimination was discontinued or the latest instance);
 - iii. a description of the alleged act of discrimination;

2020-2023 Title VI Program

- iv. the location(s) of the alleged act of discrimination (including vehicle number if appropriate);
 - v. an explanation of why the complainant believes the act to have been discriminatory on the basis of race, color, and national origin;
 - vi. if known, the names and/or job titles of those individuals perceived as parties in the incident;
 - vii. contact information for any witnesses; and
 - viii. indication of any related complaint activity (i.e., was the complaint also submitted to Federal Transit Administration?).
- d. The complaint shall be submitted to the **Loudoun County Transit Title VI Manager** either
- in person delivery to:

101 Blue Seal Drive, Suite 102, Leesburg, Virginia.
 - or by mailing to:

P.O. Box 7500, MSC #64, Leesburg, VA 20177.
- e. Complaints received by any other employee of the County shall be immediately forwarded to the Title VI Manager.
- f. In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Title VI Manager. Under these circumstances, the complainant will be interviewed, and a suitable translator, interpreter, or transcriptionist will assist the complainant in converting the verbal allegations to writing.
2. Upon receipt of the complaint, the Title VI Manager shall immediately:
- a. Notify the Director, Department of Transportation and Capital Infrastructure, if not already so informed and the Loudoun County Attorney (no later than 3 business days from receipt).
 - b. Ensure that the complaint is filed into official complaint records.
3. Within three business days of receipt of the complaint, the Title VI Manager shall contact the complainant by telephone to set up an interview.
4. The complainant shall be informed that he/she has a right to have a witness or representative present during the interview and can submit any documentation that he/she perceives as relevant to proving his/her complaint.
5. If Loudoun County has assigned staff to assist with the investigation, the Title VI Manager shall offer an opportunity for assigned staff to participate in the interview.

2020-2023 Title VI Program

6. The alleged discriminatory transit service or program official shall be given the opportunity to respond to all aspects of the complainant's allegations.
7. The Title VI Manager, with guidance and input by the County Attorney, shall determine, based on relevancy or duplication of evidence, which witnesses will be contacted and questioned.
8. The investigation may also include:
 - a. Reviewing contractor operating records, policies or procedures
 - b. Reviewing routes, schedules, and fare policies
 - c. Reviewing operating policies and procedures
 - d. Reviewing scheduling and dispatch records
 - e. Observing behavior of the individual whose actions were cited in the complaint
 - f. Documenting all steps taken and findings in the investigation in writing and included in the complaint file.
9. Prior to writing the final report regarding the alleged incident, the Title VI Manager shall contact the complainant at the conclusion of the investigation and give the complainant an opportunity to prepare a rebuttal statement.
10. At the conclusion of the investigation and within 60 days of the interview with the complainant, the Title VI Manager will prepare a report that includes a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition. This report shall be provided to the County Administrator of Loudoun County, the Director of the Department of Transportation and Capital Infrastructure, and the County Attorney of Loudoun County.
11. The Title VI Manager will send a letter to the complainant notifying him/her of the outcome of the investigation. If the complaint was substantiated, the letter will indicate the course of action that will be followed to correct the situation. If the complaint is determined to be unfounded, the letter will explain the reasoning for this decision. The complainant can appeal the determination. This letter will be copied to the Loudoun County Attorney.
12. A complaint may be dismissed for the following reasons:
 - a. The complainant requests the withdrawal of the complainant.
 - b. An interview cannot be scheduled with the complainant after three reasonable attempts. The three reasonable attempts shall include: first by one e-mail message, then by one telephone call at least two calendar days after the e-mail message was sent, and finally by one letter mailed at least three calendar days after the phone call. The complaint may be dismissed if no response is received within three weeks of the mailed letter.

2020-2023 Title VI Program

- c. The complainant fails to respond to three repeated requests for additional information needed to process the complaint. The three attempts shall be made through the preferred method (e-mail, telephone, or letter) specified by the complainant during the interview or in the sequence listed for scheduling an interview if unspecified by complainant. The third attempt should be by letter mailed at least three calendar days after the second attempt. The complaint may be dismissed if no response is received within three weeks of the mailed letter.
- d. Litigation has been filed raising similar allegations involved in the complaint.
- e. The complaint was not filed within 180 days of the alleged discrimination.
- f. The complaint does not indicate a possible violation.
- g. The complaint is so weak, insubstantial, or lacking in detail that the Title VI Manager determines it is without merit, or so replete with incoherent or unreadable statements that it, as a whole, cannot be considered to be grounded in fact.
- h. The complaint has been investigated by another agency and the resolution of the complaint meets U.S. Department of Transportation regulatory standards.
- i. The complaint allegations are foreclosed by previous decisions of the courts, the Federal Transit Administration, or U.S. Department of Transportation.
- j. The Title VI Manager obtains credible information that the allegations raised by the complaint have been resolved.
- k. The complaint is a continuation of a pattern of previously filed complaints involving the same or similar allegations that have been found factually or legally insubstantial.
- l. The same complaint allegations have been filed with another Federal, state, or local agency, and Loudoun County anticipates that the complainant will be provided with a comparable resolution process under comparable legal standard.
- m. The death of the complainant or injured party makes it impossible to investigate the allegations fully.

2020-2023 Title VI Program

Title VI Complaint Form

A copy of Loudoun County Transit's Title VI Complaint Form is shown below.

Loudoun County Transit: Title VI Complaint Form

Section 1: To be completed by the person filing the complaint.	
Full Name	
Mailing Address (required)	
City, State and Zip	
Day Time Phone (8:30 AM – 5:00 PM ET)	
E-Mail Address	
Section 2:	
Are you filing this complaint on your own behalf? (Yes/No)	
<i>If you answered yes, go to Section 3. If you answered no, complete Section 2.</i>	
Please explain why you are filing on behalf of another:	
Can you confirm that you have obtained permission of the aggrieved party to file on their behalf? (Yes/No)	
Contact information for the person for whom you are submitting	
Full Name	
Address	
City, State and Zip	
Day Time Phone (8:30 AM – 5:00 PM ET)	
E-Mail Address	
Relationship	

2020-2023 Title VI Program

Section 3			
I believe the discrimination was based on (check all that apply):			
Race	<input type="checkbox"/>	Date of Alleged Discrimination	
Color	<input type="checkbox"/>	Date of Alleged Discrimination	
National Origin	<input type="checkbox"/>	Date of Alleged Discrimination	
<p>Please explain as clearly as possible what happened and why you believe there is a case of discrimination. Describe all persons who were involved. Include the name and contact information of the person(s) (if known) who acted in a discriminatory manner as well as names and contact information of any witnesses. If more space is needed, feel free to attach additional pages.</p>			
Section 4			
Have you previously filed a Title VI complaint with this agency?			
Yes	<input type="checkbox"/>		
No	<input type="checkbox"/>		
Section 5			
Have you filed <i>this</i> Title VI complaint with any other Federal, State, or Local Agency, or with any Federal or State court?			
Yes	<input type="checkbox"/>		
No	<input type="checkbox"/>		
<p>If you answered “yes”, please list any and all agencies or courts, their level(s) (e.g. federal, state, local), and their location(s):</p>			

2020-2023 Title VI Program

Contact information for the agency/court where the complaint was filed.	
Full Name	
Title	
Agency	
Address	
City, State and Zip	
Phone	
E-Mail Address	
Section 6	
Name of Agency complaint is against	
Contact Person	
Title	
Phone Number	
Email Address	

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

REQUIRED

Signature_____

Date: _____

2020-2023 Title VI Program

The completed complaint form may be filed in writing and sent to:

Loudoun County Government

Department of Transportation and Capital Infrastructure

Attn: Title VI Manager

P.O. Box 7500, MSC #64

Leesburg, Virginia 20177

Or delivered to: 101 Blue Seal Drive, Suite 102, Leesburg, Virginia.

Public Transportation-Related Title VI Investigations, Complaints, or Lawsuits

Loudoun County and its Department of Transportation of Capital Infrastructure, up to the time of preparing this Title VI Program in October 2019, have not received any Title VI complaints relating to transit service. Additionally, there are no ongoing Title VI investigations regarding transit services for which the County is responsible for operating and/or managing.

Minority Representation on Planning and Advisory Bodies

Loudoun County established the Transit Advisory Board (TAB) in March 2016. The TAB advises the Board of Supervisors on matters pertaining to all modes of transit within the County. This advisory board provides guidance on all transit planning and transit services operating in Loudoun County, including Commuter Bus, Local Bus, and Metro-Connection services, as well as ADA paratransit.

The TAB includes nine representatives appointed by the members of the Board of Supervisors to represent each election district and the County at-large. The TAB also includes one member from the Disability Services Board, one member from the Chamber of Commerce, one member from the Loudoun County Economic Development Advisory Commission, and three additional members identified by DTCI staff to include representation of the Local Bus, Metro-Connection, and Commuter Bus transit modes operated by the County.

Applications to serve on the TAB were originally solicited through a press release. Information on how to apply is posted on Loudoun County's website. Applications are accepted through the County's standard application form for advisory boards and commissions and the supplemental form for the TAB. Loudoun County makes a concerted effort to recruit both minority and low-income individuals to apply to serve on the TAB. These explicit efforts include the following:

- A notice regarding the TAB application process was posted in Spanish on local buses in the Sterling District.
- One position on the TAB is reserved for a Local Bus rider; Local Bus riders have a median household income of \$25,000.
- Use of local and social media as well as organizations that serve Title VI protected populations to expand outreach and promote opportunities to serve on the TAB.

2020-2023 Title VI Program

Table 1 provides the current breakdown of TAB members by race and ethnicity. Current terms expire on December 31, 2019.

TABLE 1: LOUDOUN COUNTY TRANSIT ADVISORY BOARD RACE AND ETHNICITY BREAKDOWN

Race/Ethnicity					
	Caucasian	Hispanic/Latino	Black/African American	Asian American	Native American
Number of Members	7	1	3	4	0
Percent	47%	7%	20%	27%	0%

Sub-recipient Compliance with Title VI

Loudoun County does not receive FTA funding for the use of operating County transit services nor does Loudoun County receive FTA funding for grant allocation to sub-recipients.

Title VI Equity Analysis for Facilities

Loudoun County does not currently have plans to construct new transit facilities. Facilities included in this provision include transit storage facilities, maintenance facilities, operations centers, etc. In addition, the County has not constructed any new transit facilities since the publication of the most recent 2017-2020 Title VI Program.

Public Participation Plan

Introduction and Goals

Public outreach and involvement applies to and affects the County's mission and work program as a whole, particularly agency efforts and responsibilities related to the County's transit service and fare structures. Per FTA requirements, public outreach efforts must be accessible to and inclusive of all persons.

The overall mission of the DTCl's public outreach and involvement policy is to secure early and continuous public notification about, and participation in, major actions and decisions as they relate to County transit services. To achieve that mission, public engagement should:

- Actively facilitate the involvement of hard to reach communities.
- Work jointly with the community throughout the planning and implementation processes.
- Build trust between DTCl and the public by building ongoing relationships with community leaders and key stakeholder organizations, as well as proactively linking public participation and project outcomes.

In seeking public comment and review, the County makes a concerted effort to reach all segments of the population, including people from minority and low-income communities, persons with limited English proficiency (LEP) and organizations representing these and other protected classes. These goals not only help satisfy DTCl's requirements under Title VI of the Civil Rights Act, but also promote a broader vision of transportation services and infrastructure in Loudoun County that meet the needs of all stakeholders.

Overview of Outreach Strategies

The County utilizes a broad range of public outreach information and involvement opportunities, including a process for written comments, public meetings with a designated comment period, and settings for open discussion, information services, and consideration of response to public comments. Notification to the public is available on the Loudoun County web site at www.loudoun.gov. Public notification of the Transit Advisory Board Meetings and public comment periods takes place using a broad array of methods:

- Newspapers
- Loudoun County Government cable channel
- County news and information channels
- Email notices
- Social media
- Notices on buses or at bus stops
- Press releases
- County newsletters distributed regularly to riders
- Public notices posted in Loudoun County public libraries, community centers, recreation centers, senior centers, and public schools.

2020-2023 Title VI Program

Flyers should also be translated into foreign languages identified in the Language Access Plan for distribution through community-based organizations (CBOs) serving those language communities.

Going forward, the County will provide opportunities for ongoing engagement. It will inform the public about ways to provide comment to the Transit Advisory Board, including via email, phone, and mail. It will also place contact information on board buses and distribute it to CBOs that serve persons protected under Title VI.

In addition, public notices should announce opportunities to participate or provide input in planning for transit service changes, fare changes, new services, and new or improved facilities. Public notices include:

- News releases distributed to news media of general interest as well as those targeted to minority and LEP persons, community-based organizations, and homeowner associations.
- Information displayed on digital signage at County libraries and recreational facilities.
- Notifications sent to Loudoun County Public Schools parents through the County's Peach Jar system.
- Local media coverage of transit planning processes.
- County staff riding buses to speak with riders, with an emphasis on reaching LEP populations (such as ensuring that staff on-board buses can speak languages commonly used by LEP populations, as defined in the Language Access Plan).
- Attendance at community festivals and other major public events, and provision of family-friendly activities to maximize outreach to minority, low-income, and LEP populations.
- Public service announcements (PSAs) to news media of general interest and those targeted to minority, low income, and LEP persons, as well as CBOs that service persons protected under Title VI.
- Announcements of upcoming events and meetings on the county's social media accounts, and opt-in email and text message alerts.
- Flyers posted in Loudoun County public libraries, community centers, recreation centers, senior centers, and public schools.
- Pop-up events held at shopping centers, transit hubs, and other major gathering places. Pop-up locations and times will be chosen to maximize opportunities to reach LEP, minority and low-income communities.

In addition, staff conducts in-person outreach upon request at public meetings, community-based organizations (CBOs), human service organizations that assist low income and LEP persons, places of worship, service organization meetings, cultural centers, and other places and events that reach out to persons protected under Title VI.

DTCI staff will compile and maintain a list of CBOs in Loudoun County. Building relationships with CBOs will be a key strategy for reaching minority, low-income, and LEP populations. DTCI staff will provide regular updates to CBOs via email about proposed and implemented changes to transit service in the county, in addition to periodic alerts about upcoming opportunities for public comment related to transit service in Loudoun. The County will also ensure that it provides information to CBOs in a manner that maximizes the impact of CBO outreach. For instance, the County can ensure that CBOs that work

with LEP populations receive information in the languages in which their constituents are fluent, not just English. DTCI staff will also track the organization's efforts to reach minority, low-income, and LEP populations using a feedback survey provided in electronic form to attendees at public events. A sample version of this form can be found below.

Loudoun County Department of Transportation and Capital Infrastructure

Public Participation Comment Card

Thank you for participating in today's event! Please take a moment to complete this short information card to help us plan future public events. All information on this form is confidential.

1. First, we would like you to rate your experience today. How would you rate the following:

a. The event as a way for Loudoun County to hear the opinions of the public

☐ Poor ☐ Fair ☐ Good ☐ Excellent

b. Usefulness of the information presented at this event

☐ Poor ☐ Fair ☐ Good ☐ Excellent

c. Time of day the event was held

☐ Poor ☐ Fair ☐ Good ☐ Excellent

d. Ease of getting to the location where the event was held

☐ Poor ☐ Fair ☐ Good ☐ Excellent

e. Accessibility of this location for those with physical impairments

☐ Poor ☐ Fair ☐ Good ☐ Excellent

f. What, if anything, can we do to improve future events like this?

2. Did you require non-English speaking assistance today?

☐ No ☐ Yes

Was someone available who spoke your primary language?

☐ No ☐ Yes

3. If English is not your first language, what is the language you speak most often at home?

2020-2023 Title VI Program

4. If English is not your first language, how well do you speak English? (Circle one)

- a. Very well
- b. Well
- c. Not well
- d. Not at all

5. What is your race? (Check all that apply)

- | | | | |
|--------------------------------|--|---|--|
| <input type="checkbox"/> White | <input type="checkbox"/> Black or African American | <input type="checkbox"/> Hispanic or Latino | <input type="checkbox"/> Native American |
| <input type="checkbox"/> Asian | <input type="checkbox"/> Pacific Islander | <input type="checkbox"/> Two or more races | <input type="checkbox"/> Other, specify: |

6. What is your annual household income?

- a. \$50,000 or above
- b. Below \$50,000

If you would like to be added to our email list to receive follow-up information regarding this project, please provide your email below:

Examples of Public Outreach Efforts

Table 2 lists dates and descriptions of public outreach efforts undertaken over the time period of the most recent Title VI Program.

TABLE 2: OUTREACH EVENTS OVER TIME PERIOD OF MOST RECENT TITLE VI PROGRAM

Event Description	Date	Attendees
TAB and Transit Outreach Event #1 at LC Government Center	January 18, 2017	20
TAB and Transit Outreach Event #2 at Cascades Library	February 4, 2017	12
TAB and Transit Outreach Event #3 at Dulles South	February 28, 2017	14
TAB and Transit Outreach Event #4 at Loudoun Valley	March 15, 2017	2
On-site Outreach to Verizon Transit Riders Regarding Changes to Payment System	June 21, 2017	15
LC Transit Service Change Event	March 13, 2018	Not tallied
LC Transit Service Change Event	March 22, 2018	Not tallied
LC Transit Spanish Speaking Outreach Event at Sterling Library	July 19, 2018	8

Two public outreach endeavors are described below.

Transit Advisory Board Meeting

Prior to the addition of the Local Bus service to Loudoun County, the Transit Advisory Board met only at the Government Center in Leesburg, Virginia. In an effort to encourage more public participation, the Transit Advisory Board decided to begin holding its bi-monthly meeting at locations throughout the County. Transit Advisory Board business meetings are held at 7:00 p.m. in public libraries or other community facilities that are accessible to the public. Meetings have been held in the communities of Sterling, South Riding, Stone Ridge, Brambleton, Leesburg, Ashburn, and Potomac Falls. Meeting facilities within walking distance of a transit bus route have been given preference. Additionally, the Transit Advisory Board has recently modified their agenda to make it clear that public comments are welcome. An agenda item for “Public Comment Period” is listed on business meeting agendas along with guidelines in the complete agenda packets that are available online.

Spanish Speaking Outreach (Sterling Library)

During the summer of 2018, the Loudoun County Public Library wished to provide programs targeting the Spanish speaking population of Sterling. DTCL staff were invited to present information at an event

2020-2023 Title VI Program

scheduled for July 19, 2018. With the help of a design firm, DTCI prepared a stock card piece in Spanish that described all the transit routes in Loudoun County. A staff member from MV Transportation presented information in Spanish to the audience of eight. The event was well received by participants.

Service Changes

Table 3 summarizes service changes that have occurred since the previous Title VI Program.

TABLE 3: DTCI SERVICE CHANGES, 2017 – 2020

Route Number	Change Type	Description of Change	Fiscal Year
62	Service	Realign to connect to Local fixed route hub at Dulles Town Center and to use an existing bus shelter near Ashburn Village.	2018
85	Service	Eliminate route due to poor performance.	2018
86	Service	Eliminate route; addition of two Park and Ride lots obviates need.	2018
86 Midday	Service	Eliminate run; addition of two Park and Ride lots obviates need.	2018
89X	Service	Eliminate route due to poor performance and existence of other options.	2018
Run 102E	Service	Eliminate run; other connections obviate need.	2018
Run 800D Shadow	Service	Eliminate overflow bus; run reduced to one bus.	2018
N/A	Fare	Increase of fare from \$9.00 to \$10.00 per trip on Premium Long-Haul buses (Commuter Bus service) for riders using SmarTrip cards to pay their fares Increase of fare from \$10.00 to \$11.00 per trip on Premium Long-Haul buses (Commuter Bus service) for riders using cash to pay their fares.	2019
83	Service	Eliminate route; route absorbed by Route 990.	2019
87X	Service	Reduce number of buses from two to one.	2019
88X	Service	Expand service to include stops at the Stone Ridge Park and Ride lot and the StoneSprings Hospital.	2019
980/985	Service	Create new service direct connection between Sterling Park and the Wiehle-Reston East Metrorail Station.	2019
83/990	Service	Combine and optimize Route 990 and Route 83 to better serve the area in and around Quantum Park/AOL/Pacific Blvd.	2019

2020-2023 Title VI Program

Route Number	Change Type	Description of Change	Fiscal Year
991	Service	Eliminate due to pending closure of a Park and Ride lot.	2019
Run 802	Service	Add a bus to relieve overcrowding.	2019
Run 815	Service	Eliminate run due to poor performance.	2019
Run 823	Service	Establish new run to split overcrowding on Run 802.	2019
Run 103W	Service	Reconfigure to add DC stops in central and south zones.	2020
Run 108W	Service	Eliminate run; combine additional runs to compensate for change.	2020
Run 305	Service	Reconfigure to remove Rosslyn/DC central/east zones.	2020
Run 307	Service	Reconfigure to remove Rosslyn/DC east zones.	2020
Run 413	Service	Reconfigure to remove Rosslyn/DC central/east zones.	2020
Run 508	Service	Reconfigure to remove DC east/central zones.	2020
Run 512	Service	Establish new run to accommodate passengers from Runs 502 and 702.	2020
Run 707	Service	Eliminate run due to duplicative service.	2020
Run 811	Service	Reconfigure to remove DC west and add Harmony/Purcellville.	2020
Run 814	Service	Reconfigure to remove DC east and add Harmony/Purcellville.	2020

Service Area Profile

Loudoun County Transit

Since the Fall of 2013, the Loudoun County Department of Transportation and Capital Infrastructure (DTCI) has provided three types of fixed-route bus transit service (**Figure 1** and **Table 4**).

- **Local Bus:** Fixed-route bus service within Loudoun County with some routes also connecting to the Wiehle-Reston East Metrorail station (nine routes). Route 40 (Purcellville Connector) and three rural on-demand routes (Ashburn, Middleburg, and Lovettsville) are currently provided by Virginia Regional Transit rather than by Loudoun County Transit.
- **Metro-Connection:** Limited stop bus service between Loudoun and the West Falls Church and Wiehle-Reston East Metro stations, as well as reverse commute service from the Wiehle-Reston East Metro Station (two primary trip patterns split across many routes). Once Phase 2 of the Dulles Corridor Metrorail Project is complete, Metro-Connection service will likely shift from Wiehle-Reston East Metro Station to the new Metrorail stations at Dulles Airport, Loudoun Gateway, and Ashburn. Within the context of this Title VI Program, Metro-Connection service is assumed to be included in Local Bus service.
- **Commuter Bus (Long-haul):** Peak period bus service from Park and Ride lots in Loudoun County to employment centers in Washington, D.C. and northern Virginia.

FIGURE 1: LOUDOUN COUNTY DTCI SERVICE TYPES

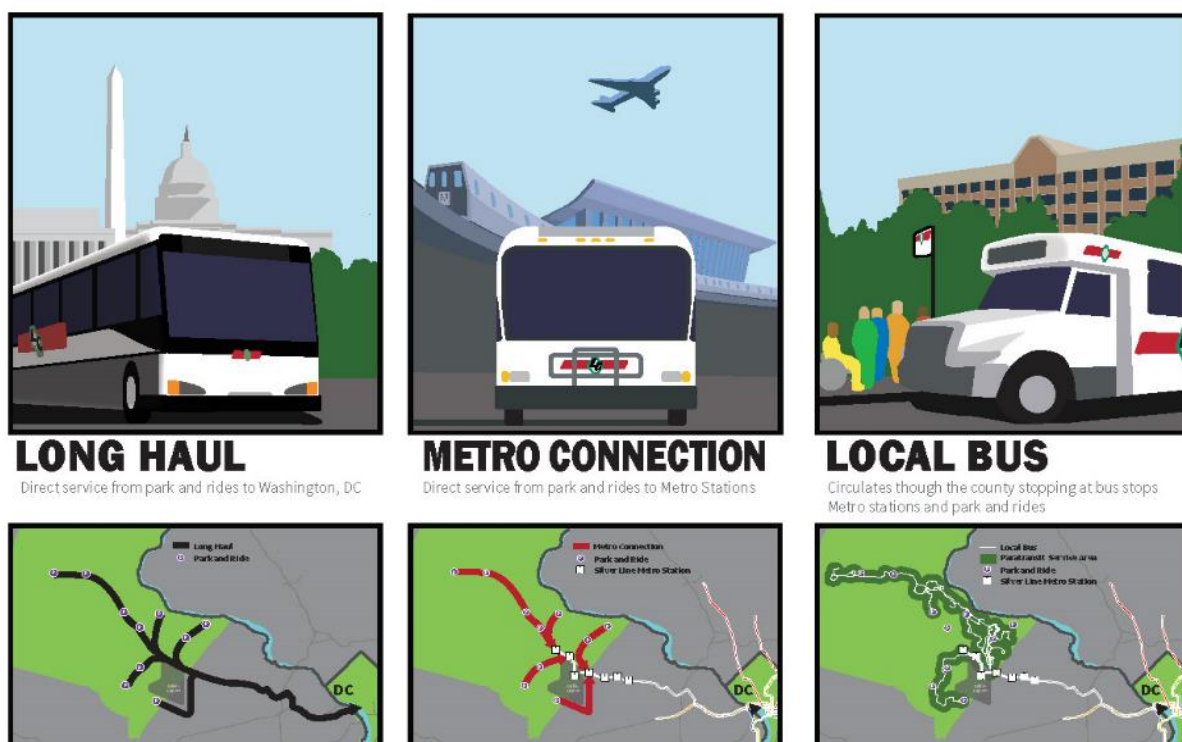





TABLE 4: LOUDOUN COUNTY DTCI BUS SERVICE

Type	Route Number	Route Name
Local Bus 	Route 54	Safe-T-Ride
	Route 55	Exeter/Tuscarora
	Route 56	Rust Library/Ida Lee/County Complex
	Route 57	Village at Leesburg/Wegmans
	Route 62	Ashburn Connector
	Route 70	Leesburg/Sterling
	Route 80	Sugarland Run/Sterling
	Route 81	Countryside Connector
	Route 82	Sterling Connector
Metro-Connection (Local) 	Route 72	Wiehle Express
	Route 84	Atlantic Connector
	Route 87x	Dulles Town Center/Wiehle-Reston East Express
	Route 88x	StoneSprings Hospital, Stone Ridge, East Gate/Wiehle-Reston East Express
	Routes 901/902	Potomac Falls/West Falls Church
	Routes 921/922	Leesburg, Harmony/Wiehle-Reston East
	Routes 923/924	Goose Creek, Broadlands/Wiehle-Reston East
	Routes 925/926	Loudoun Station, Dulles North/Wiehle-Reston East
	Routes 927/928	Dulles North, Loudoun Station, Broadlands, Goose Creek, Leesburg, Harmony, Purcellville/Wiehle-Reston East
	Route 931/932	Purcellville/Wiehle-Reston East
	Route 985	Sterling/Wiehle-Reston East
	Routes 990/992/993/994	Wiehle-Reston East to Employer Sites in Loudoun
Commuter Bus	<u>Western Loudoun → DC</u> Runs 401-420	Morning departures from Purcellville, Harmony & Leesburg to Crystal City, Rosslyn, The Pentagon, and Washington, DC

2020-2023 Title VI Program

Type	Route Number	Route Name
	<u>DC → Western Loudoun</u> Runs 801-823	Afternoon departures from Washington, DC, The Pentagon, Rosslyn, and Crystal City to Leesburg, Harmony, and Purcellville
	<u>DC → Loudoun</u> Run 800D	Midday run from DC, Rosslyn to Dulles North, Leesburg, Harmony, and Purcellville (Friday only)
	<u>Eastern Loudoun → DC</u> Runs 101-111 Runs 201-211 Runs 251-253 Runs 301-309 Runs 404, 406, 408, 417, 419	Morning departures from Dulles North Transit Center, Dulles South, East Gate, Brambleton, Ashburn North, and Loudoun Station to Crystal City, Rosslyn, The Pentagon, Washington, DC
	<u>DC → Eastern Loudoun</u> Runs 501-511 Runs 601-612, 651-654 Runs 701-708 Runs 804, 807, 809, 812, 818, 821, 822	Afternoon departures from Washington, DC, The Pentagon, Rosslyn, Crystal City to Dulles North Transit Center, Dulles South, Brambleton, East Gate, Ashburn North, and Loudoun Station

The three service types are currently provided using two separate bus operator contracts. Beginning July 1, 2020, Loudoun County intends to operate all transit service through one contractor. With the expansion of the Silver Line Metrorail and the opening of three rail stations in Loudoun County, DTCI envisions combining the Metro-Connection and Local Bus services during the period of this 2020-2023 Title VI Program. As of the date of this report, Metrorail service to and from Loudoun County may begin as early as Fall 2020.

Fares

Loudoun County Transit accepts the SmarTrip card on its Commuter Bus service, as well as on some Metro-Connection routes. Currently, all Local Bus service and approximately half of Metro-Connection routes accept cash fares only. For routes that accept both SmarTrip and cash fares, passenger fares are slightly discounted when using the SmarTrip card. Punch passes (available for \$5.00) are accepted on cash-only routes. Cash and SmarTrip fares are broken down by service type and route in **Table 5**.

TABLE 5: LOUDOUN COUNTY BUS FARES

Service	Cash Fare	SmarTrip Fare
Commuter Bus	\$11.00	\$10.00
Local Bus Routes 55, 56, 57, 62, 70, 80, 81, 82, and 84	\$1.00	Cash Only
Local Bus Route 54 Safe-T-Ride	Free	N/A
Metro-Connection Route 72	\$1.00 (Free for GWU students and employees with ID)	Cash Only
Metro-Connection Routes 87X, 88X, 921/922, 923/924, 925/926, and 927/928	\$1.50 (Metro) \$1.00 (Intra-County)	\$1.00
Metro-Connection Routes 901/902	\$2.00 (Metro) \$1.00 (Intra-County)	\$1.50 (Metro) Cash Only (Intra-County)
Metro-Connection Routes 931/932, 985, and 990/992/993/994	\$1.00	Cash Only

Regional Transit

Table 6 summarizes fixed-route bus service available in Loudoun County that is operated by other providers. Fairfax Connector and WMATA Metrobus each provide limited fixed-route bus service to Loudoun County, primarily near the Dulles Airport area. In addition, Virginia Regional Transit operates Route 40 (Purcellville Connector) with bus service between stops in Purcellville, Harmony, and Leesburg. As discussed, the planned extension of the WMATA Metrorail Silver Line to Loudoun County will greatly enhance fixed-route service in the region.

TABLE 6: ADDITIONAL FIXED ROUTE BUS SERVICE IN LOUDOUN COUNTY

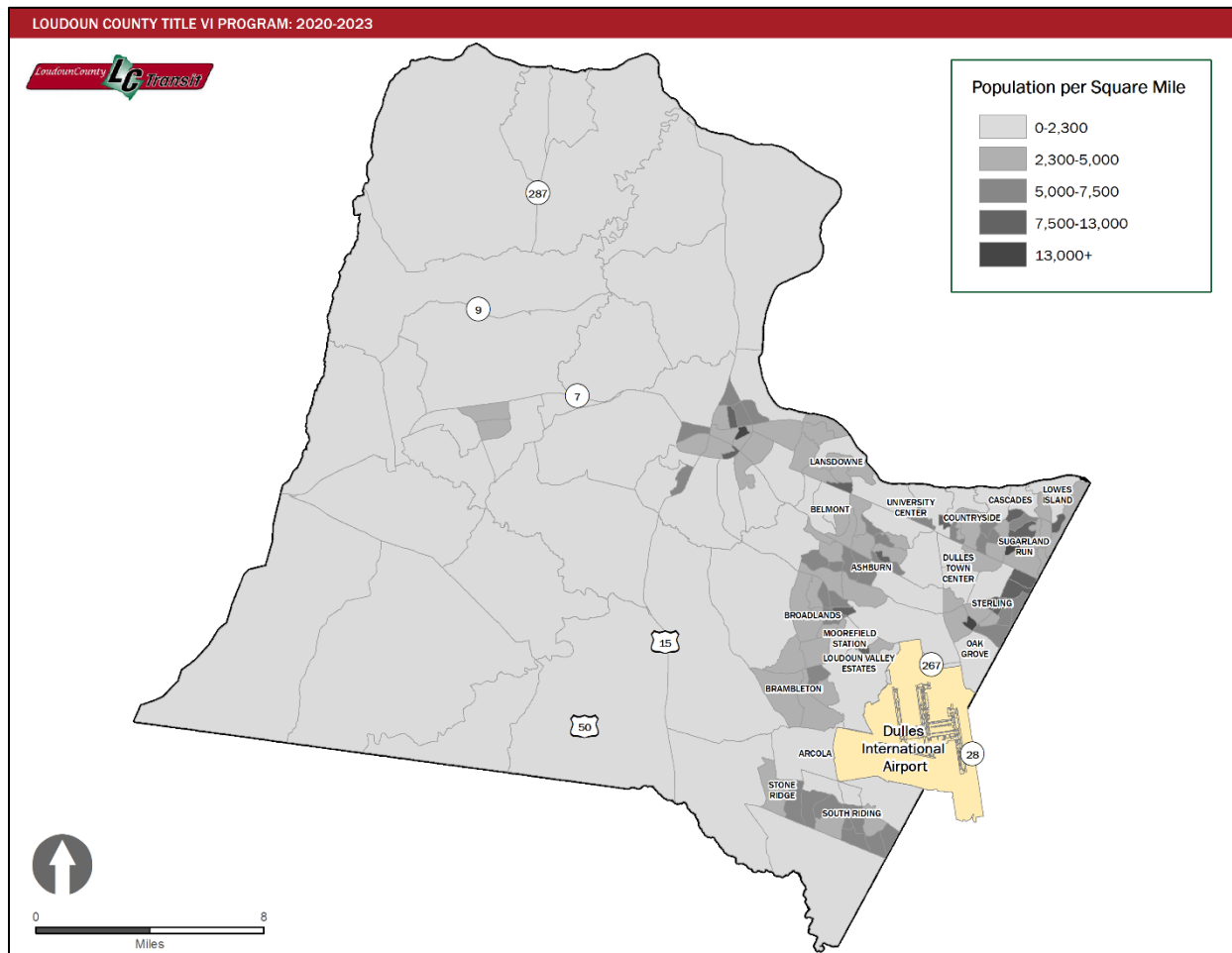
Operated By	Route Number	Route Name
Fairfax Connector (Fairfax County DOT)	Route 924	Herndon Parkway – Dranesville
	Route 926	Dranesville – Worldgate Drive
	Route 981	Dulles Airport - Wiehle
	Route 983	Dulles Airport – Udvar-Hazy – Wiehle
Metrobus (WMATA)	Route 5A	D.C.-Dulles Line
Virginia Regional Transit (VRT)	Route 40	Purcellville Connector

Loudoun County Demographic Maps

According to the 2013-2017 Five-Year American Community Survey, Loudoun County's population is 374,558. This represents an increase of 3.17% from the previous estimate obtained for the 2017-2020 Title VI Program report. The maps in this section provide an overview of key demographic characteristics in Loudoun County.

Figure 2 shows population density (population per square mile) in the county. The county's densest residential areas are located in its eastern half, around and north of Dulles Airport, as well as surrounding Leesburg.

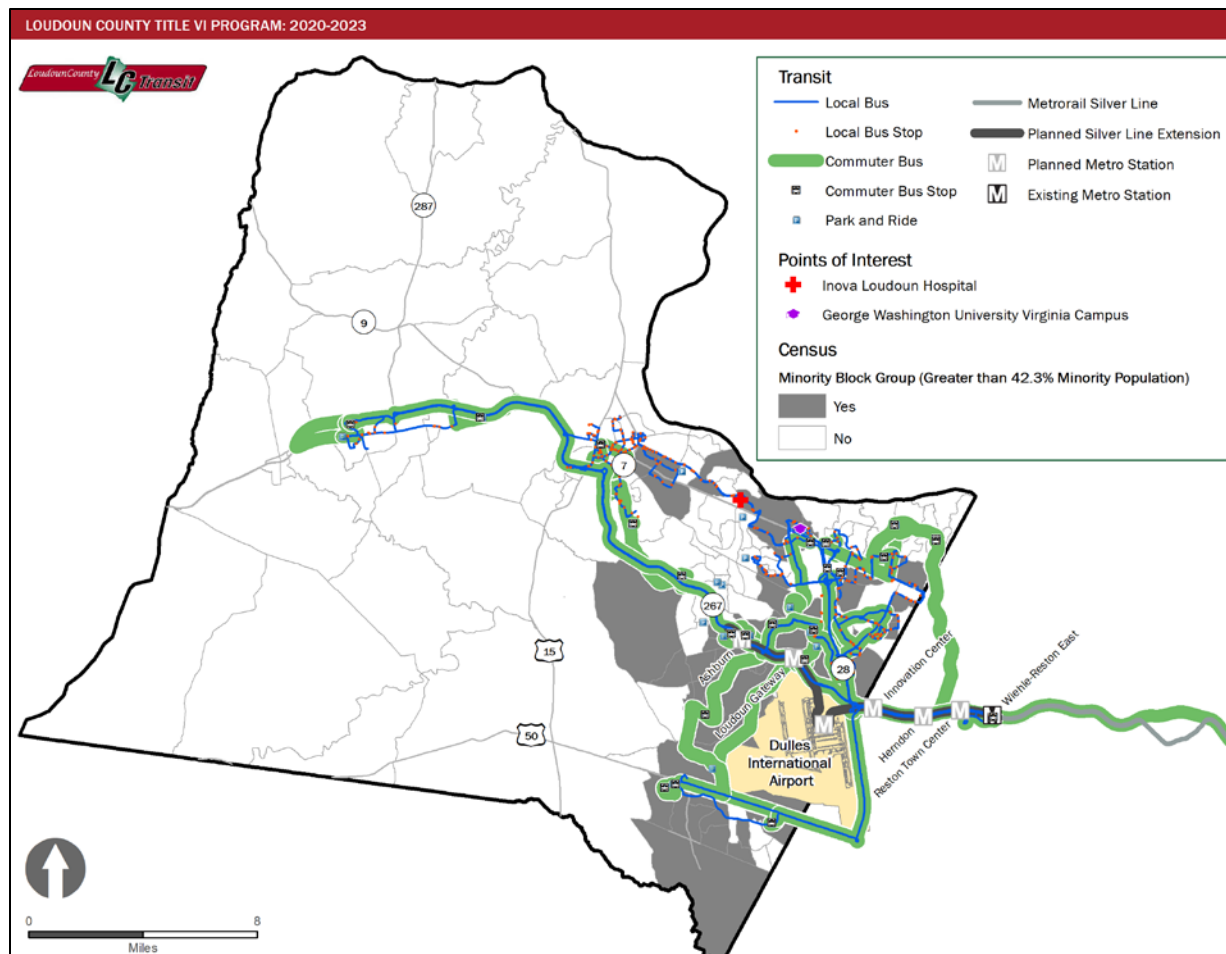
FIGURE 2: POPULATION DENSITY IN LOUDOUN COUNTY



2020-2023 Title VI Program

Figure 3 shows the distinction between minority and non-minority Census Block Groups in Loudoun County, with existing transit and points of interest depicted. Minority Block Groups are defined as Block Groups in Loudoun County where the percentage of minority persons exceeds the average percentage minority population across Loudoun, 42.3 percent. Minority Block Groups are predominantly concentrated in the County's southeastern portion, largely corresponding with the densest areas of the County.

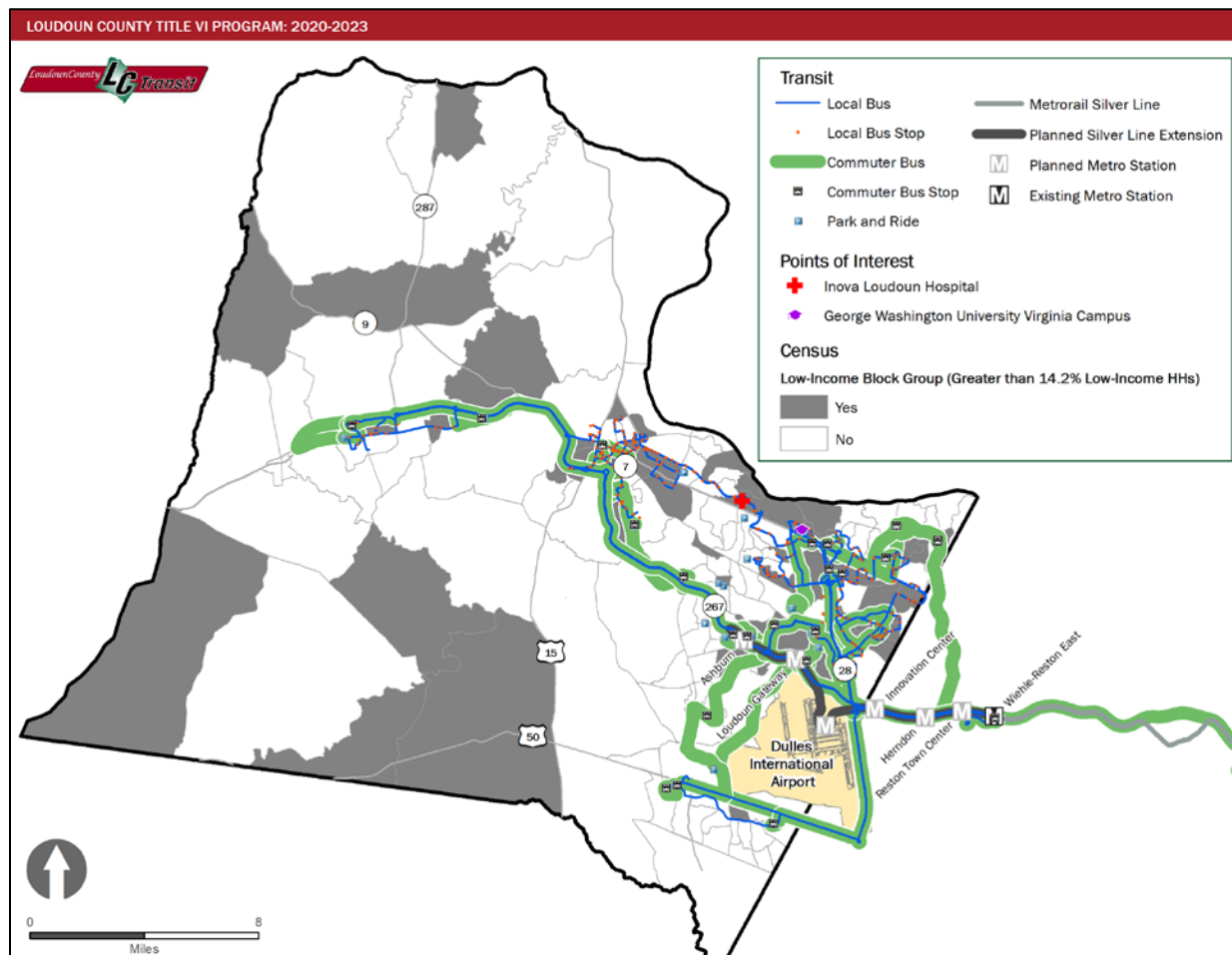
FIGURE 3: MINORITY POPULATION IN LOUDOUN COUNTY



2020-2023 Title VI Program

As permitted by the Federal Transit Administration, Loudoun County Transit has developed its own definition for low-income. This definition is at least as inclusive as the U.S. Department of Health and Human Services poverty guidelines. Loudoun County Transit considers a median household income of less than \$50,000 annually to be low-income for the purposes of transportation equity. **Figure 4** highlights low-income Census Block Groups in Loudoun County. These are defined as Block Groups where the percentage of low-income households (earning less than \$50,000 annually) exceeds the 14.2 percentage average low-income households for Loudoun County. Relative to minority Block Groups, low-income Block Groups are more evenly dispersed across Loudoun County.

FIGURE 4: LOW-INCOME HOUSEHOLDS IN LOUDOUN COUNTY



Loudoun County Transit Ridership Profile

In 2015, Loudoun County DTCl conducted an origin and destination survey of Loudoun County Transit's Commuter Bus and Local Bus riders. While each survey asked slightly different questions, both requested the same information regarding the passenger's race, English proficiency, language spoken at home, income, fare media usage, and alternative trip mode availability. This section presents an analysis of demographic and socioeconomic findings from the 2015 survey, which is the most recent profile of Loudoun County Transit riders available at the time of this program update.

Race/Ethnicity of Loudoun County DTCl Riders

Approximately two-thirds of Local Bus respondents indicated that they were of a race other than non-Hispanic white, while approximately one-third of Commuter Bus respondents identified as having a race other than non-Hispanic white. All races other than non-Hispanic white are considered as minority populations. **Table 7** shows the percentage of respondents from each racial group.

TABLE 7: RACE/ETHNICITY OF LOUDOUN COUNTY DTCl RIDERS (RIDER SURVEY)

	Percent of Local Bus Riders	Percent of Commuter Bus Riders
White	35%	63%
Black/African American	35%	9%
Hispanic	8%	1%
Asian	8%	23%
Two or more Races	5%	2%
American Indian or Alaska Native	3%	1%
Hawaiian or Other Pacific Islander	1%	0%
Other Race	3%	1%

Respondents on individual Local Bus routes ranged from 30 percent to 100 percent minority (**Table 8**); minority percentages on the two Commuter Bus runs receiving responses ranged from 34 to 36 percent (**Table 9**). Local Bus ridership has a significantly higher share of minority population (65 percent) than the County as a whole. According to the 2013-2017 American Community Survey, 42.3 percent of Loudoun County's population is non-white-alone minority (**Table 10**).

TABLE 8: PERCENT MINORITY BY LOCAL BUS ROUTE (RIDER SURVEY)

Route	Percent Minority	Higher than Local Bus Average? (65%)
54 Safe-T-Ride	68%	Yes
55	55%	No
56	50%	No
57	53%	No
62	61%	No
70	67%	Yes

2020-2023 Title VI Program

Route	Percent Minority	Higher than Local Bus Average? (65%)
72	62%	No
80	71%	Yes
81	60%	No
82	68%	Yes
83	91%	Yes
84	100%	Yes
85	80%	Yes
901	54%	Yes
902	30%	No

TABLE 9: PERCENT MINORITY BY COMMUTER BUS RUN (RIDER SURVEY – ONLY AVAILABLE FOR ROUTES BELOW)

Route	Percent Minority	Higher than Commuter Bus Average? (36%)
101	36%	No
301	34%	No

TABLE 10: RACE/ETHNICITY - LOUDOUN COUNTY (AMERICAN COMMUNITY SURVEY, 2013-2017)

Percent of Population	
White	67%
Black/African American	8%
Hispanic	13% ¹
Asian	17%
Two or more Races	5%
American Indian or Alaska Native	0%
Hawaiian or Other Pacific Islander	0%
Other Race	3%

¹ Given that respondents identifying as Hispanic may also be counted in a different racial category depending on how they identify, these numbers do not add up to 100 percent.

Income Levels of Loudoun County DTCI Riders

Over three quarters of Local Bus respondents indicated their annual household income was below \$50,000, while only three percent of Commuter Bus rider respondents indicated annual household incomes below \$50,000 (**Table 11**). Loudoun County Transit uses an annual household income of less than \$50,000 for determining low-income households.

TABLE 11: LOW INCOME LOUDOUN COUNTY DTCI RIDERS (RIDER SURVEY)

Income Status	Percent of Local Bus Riders	Percent of Commuter Bus Riders
Low-Income (under \$50,000)	77%	3%
Non-Low Income	23%	97%

Table 12 shows percentages of Local Bus and Commuter Bus riders by household income level based on the 2015 rider survey. While 77 percent of Local Bus riders identified as low-income, just three percent of Commuter Bus riders identified as low-income.

TABLE 12: HOUSEHOLD INCOME OF LOUDOUN COUNTY DTCI RIDERS (RIDER SURVEY)

Income Level	Percent of Local Bus Riders	Percent of Commuter Bus Riders
Less than \$10,000	27%	0%
\$10,000 to \$19,999	17%	0%
\$20,000 to \$29,999	18%	1%
\$30,000 to \$49,999	15%	2%
\$50,000 to \$74,999	9%	6%
\$75,000 to \$99,999	6%	12%
\$100,000 to \$149,999	5%	33%
\$150,000 to \$199,999	2%	22%
\$200,000 or more	2%	23%

Table 13 summarizes the percent of respondents identifying as low-income by route, compared to the percentage of all Local Bus respondents identifying as low-income (77 percent). Low-income percentages ranged from three percent (Route 902) to 100 percent (Route 84). **Table 14** summarizes this information for the two Commuter Bus runs receiving responses: Runs 101 (three percent identifying as low-income) and 301 (eight percent identifying as low-income, above the Commuter Bus average).

TABLE 13: PERCENT LOW-INCOME BY LOCAL BUS ROUTE (RIDER SURVEY)

Route	Percent Low Income (Under \$50K)	Higher than Local Bus Average? (77%)
54 Safe-T-Ride	87%	Yes
55	91%	Yes
56	74%	No
57	74%	No
62	97%	Yes
70	80%	Yes
72	35%	No
80	91%	Yes
81	93%	Yes
82	86%	Yes
84	100%	Yes
901	6%	Yes
902	3%	No

TABLE 14: PERCENT LOW-INCOME BY COMMUTER BUS RUN (RIDER SURVEY)

Route	Percent Low Income (under \$50K)	Higher than Commuter Bus Average? (3%)
101	3%	No
301	8%	Yes

According to the American Community Survey, approximately 14 percent of Loudoun County's population is low-income (**Table 15**). This signifies that Local Bus ridership has a significantly higher share of low-income population (77 percent) than the County as a whole.

TABLE 15: HOUSEHOLD INCOME - LOUDOUN COUNTY (AMERICAN COMMUNITY SURVEY, 2013-2017)

Income Status	Percent
Low-Income (under \$50,000)	14%
Non-Low Income	86%

Native Language and English Proficiency

Almost half of Local Bus respondents, and just over a quarter of Commuter Bus respondents, indicated that they speak a language other than English at home (**Table 16**). Respondents who speak English “Less than Very Well” are considered limited-English proficient, per the U.S. Department of Justice. Just over a quarter of Local Bus riders indicated that they speak English “Less than Very Well”; only eight percent of Commuter Bus respondents indicated that they speak English “Less than Very Well” (**Table 17**).

TABLE 16: ENGLISH USE AT HOME – RIDER SURVEY (“DO YOU SPEAK A LANGUAGE OTHER THAN ENGLISH AT HOME?”)

	Percent of Local Bus Riders	Percent of Commuter Bus Riders
Yes	44%	28%
No	56%	72%

TABLE 17: ENGLISH ABILITY – RIDER SURVEY (“HOW WELL DO YOU SPEAK ENGLISH?”)

	Percent of Local Bus Riders	Percent of Commuter Bus Riders
Very Well	72%	92%
Less than Very Well (LEP)	28%	8%

Over 70 percent of limited-English proficient Local Bus respondents who specified a language when asked “Do you speak a language other than English at home?” indicated that they spoke Spanish (**Table 18**). Just over 20 percent of limited-English proficient Commuter Bus respondents indicated that they spoke Spanish (**Table 19**).

TABLE 18: TOP FIVE LANGUAGES SPOKEN AT HOME BY LEP RESPONDENTS – LOCAL BUS

Language	Percent
Spanish	72%
French	4%
Tagalog	3%
Arabic	3%
Yoruba	3%

TABLE 19: TOP FIVE LANGUAGES SPOKEN AT HOME BY LEP RESPONDENTS – COMMUTER BUS

Language	Percent
Spanish	22%
Telugu	19%
Chinese	17%
Hindi	10%
Vietnamese	8%

Alternative Trip Mode and Vehicle Availability

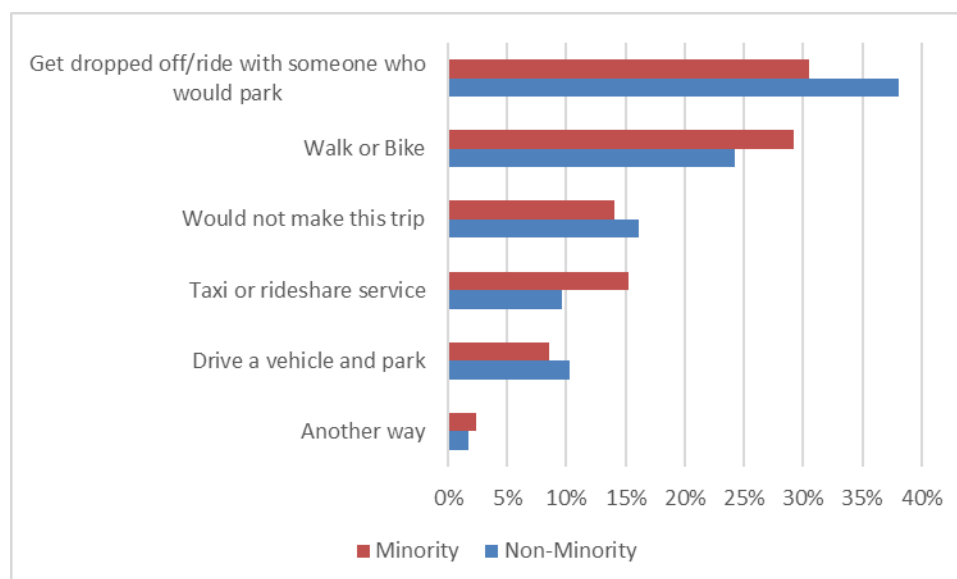
Local Bus

Over half of Local Bus respondents indicated they would either get dropped off by someone or walk if the bus were not available; eight percent of respondents said they would drive, and 15 percent said that would not make the trip (**Table 20**). Minority Local Bus respondents were relatively more likely to walk or bike or use a taxi or rideshare service than non-minority respondents (**Figure 5**).

TABLE 20: LOCAL BUS – ALTERNATIVE TRIP MODE (“HOW WOULD YOU MAKE THIS TRIP IS THIS BUS WERE NOT AVAILABLE?”)

Trip Mode	Respondents
Get dropped off by someone	29%
Walk	25%
Would not make trip	15%
Taxi or Rideshare Service	14%
Drive a Vehicle and Park	8%
Bicycle	3%
Ride with someone who would park	3%
Shuttle	1%
Other	1%

FIGURE 5: ALTERNATIVE TRIP MODE BY RACE/ETHNICITY (LOCAL BUS)



2020-2023 Title VI Program

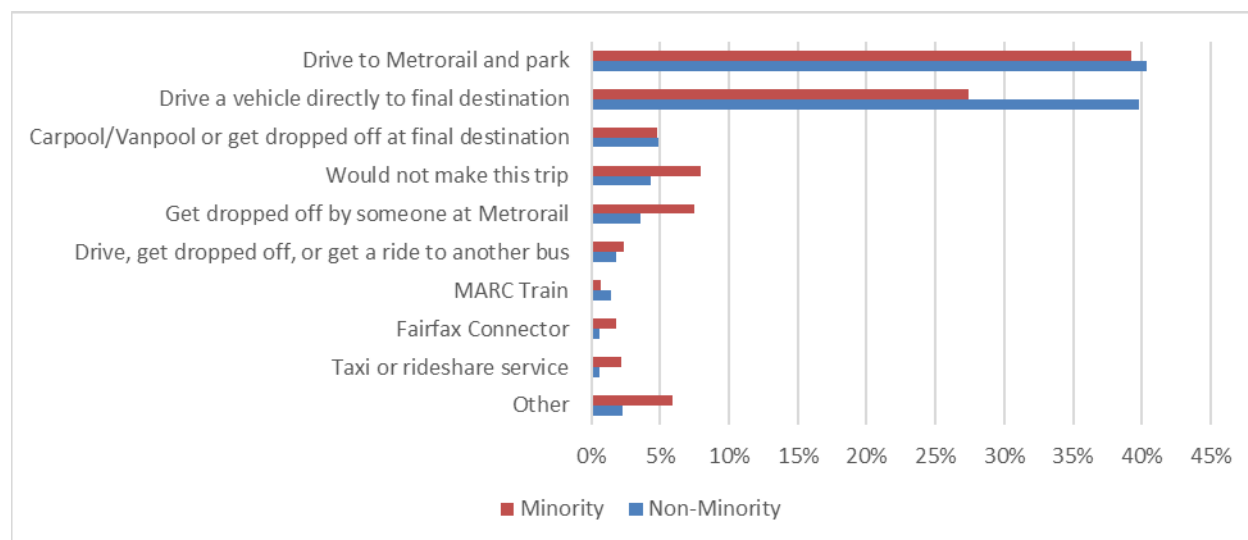
Commuter Bus

Three quarters of Commuter Bus respondents indicated that if the bus were not available, they would either drive to a Metrorail station or drive a vehicle directly to their final destination; only six percent indicated that they would not make the trip at all if the bus were not available (**Table 21**). Minority Commuter Bus respondents were less likely than non-minority respondents to indicate that they would drive directly to their final destination if the bus were not available (**Figure 6**).

TABLE 21: COMMUTER BUS – ALTERNATIVE TRIP MODE (“HOW WOULD YOU MAKE THIS TRIP IF THIS BUS WERE NOT AVAILABLE?”)

Trip Mode	Percent
Drive to Metrorail and park	40%
Drive a vehicle directly to your final destination	35%
Carpool/Vanpool or get dropped off at final destination	5%
Would not make trip	6%
Get dropped off at Metrorail	5%
Drive, get dropped off, or ride with someone to another bus	2%
MARC Train	1%
Fairfax Connector	1%
Taxi or rideshare service	1%
Other	4%

FIGURE 6: ALTERNATIVE TRIP MODE BY RACE/ETHNICITY (COMMUTER BUS)



Just under half of Local Bus respondents indicated that they had no usable vehicles at home (**Table 22**), and only 17 percent said that they had a usable vehicle available to make the trip that day (**Table 23**). Vehicle availability was not a question asked on the Commuter Bus patron survey.

2020-2023 Title VI Program

TABLE 22: LOCAL BUS – NUMBER OF USABLE VEHICLES AT HOME²

Vehicles Available	Percent of Local Bus Riders
No Vehicles Available	44%
One Vehicle	33%
Two Vehicles	17%
Three Vehicles	6%

TABLE 23: LOCAL BUS – AVAILABILITY OF USABLE VEHICLE TO MAKE THE TRIP TODAY³

	Percent of Local Bus Riders
Yes	17%
No	83%

Fare Payment

Over 90 percent of Local Bus respondents indicated that they used cash to pay for their bus fare, with the remainder using either a bus pass, George Washington University identification card, a free ride, or some other method (**Table 24**).

TABLE 24: LOCAL BUS – FARE MEDIA⁴

Fare Medium	Percent of Local Bus Riders
Cash	92%
Bus Pass – 5 Trip	3%
GWU ID	2%
Free/Safety Ride	2%
Bus Pass – Single Trip	1%
Other	1%

Nearly all of Commuter Bus respondents indicated using a SmarTrip card to pay their bus fare (**Table 25**).

TABLE 25: COMMUTER BUS – FARE MEDIA

Fare Medium	Percent of Commuter Bus Riders
SmarTrip	99.8%
Cash	0.1%
Other	0.1%

² Complete survey question: “How many usable cars, SUVs, trucks, or vans are at your home?”

³ Complete survey question: “Did you have a car, SUV, truck, or van available to you today that you could have used to make this trip, instead of riding the bus?”

⁴ Total may not equal 100 percent due to rounding.

Language Access Plan

Introduction

Loudoun County Department of Transportation and Capital Infrastructure (DTCI) operates a suite of services, including a Local Bus and Commuter Bus (long-haul) service.⁵ The structure of DTCI's services reflects its land use and demographic profile. Loudoun County is a rapidly growing community in the Greater Washington, DC Metropolitan Area. The County has seen extensive land development and population growth over the past 15 years, as evidenced by the County population more than doubling between the 2000 Census and the 2013-2017 Five-Year American Community Survey (ACS). Loudoun County's population has also diversified; according to the 2013-2017 ACS, one in four residents of Loudoun County was not born in the United States.

Starting in 2005, the Loudoun County Board of Supervisors established an inter-departmental committee to develop a *Language Access Policy* for all County departments and personnel. The committee recommended a centralized staff position and dedicated funding to support language access needs in 2007. The Board of Supervisors approved the official policy as part of the same set of recommendations. The *Language Access Policy* states "Loudoun County departments and its personnel will take reasonable steps to provide limited English proficient (LEP) persons with timely and meaningful access to services and benefits."

Since policy adoption in 2007, Loudoun County has implemented translation and interpretation services, including enabling Google Translate for the entire County website, and facilitated translation of documents across 10 County departments. The County contracts with vendors to provide phone interpretation, face-to-face interpretation, and written translation services. Nearly 10 years since the *Language Access Policy* was adopted, Loudoun has made significant progress in establishing a program and dedicating resources. The aim of this Language Access Plan is to further refine existing resources to better meet the needs of the Department of Transportation and Capital Infrastructure (DTCI) to ensure all County residents, employees, and visitors have timely and meaningful access to available transit services.

Four Factor Analysis

The U.S. Department of Justice developed the Four Factor Analysis to provide a clear framework through which recipients of federal funding can determine the extent of their obligation to provide services to limited English proficient individuals. Accordingly, the FTA requires that all recipients use the Four Factor Analysis to ensure their programs, policies, and activities comply with Title VI regulations and to aid in Language Access Planning. The following factors must be taken into account when developing a Language Access Plan:

⁵ In this Title VI Program, Metro Connection routes are considered Local Bus service.

2020-2023 Title VI Program

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient. To assess this factor the following metrics were analyzed:

- How LEP persons interact with DTCL.
- Identification of LEP communities that use DTCL.
- The literacy skills of LEP populations in their native languages.
- Whether LEP persons are underserved by DTCL due to language barriers.

Factor 2: The frequency with which LEP persons come into contact with the program. To assess this factor the following metrics were analyzed:

- How often LEP persons ride the bus.
- How frequently LEP persons purchase passes and tickets through vending machines, outlets, websites, and over the phone.
- How often they participate in public meetings.
- How often they interact with customer service.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives. To assess this factor the following issue was analyzed:

- If Local and Commuter Bus service is a vital service for LEP persons in Loudoun County.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. To assess this factor the following issues were analyzed:

- What services are possible within the department's budget, and what potential exists for sharing of language assistance materials and services between the transit agency and community groups.

The FTA requires transit agencies use the findings from the Four Factor Analysis to determine which language assistance services are appropriate and address the identified needs of DTCL's unique bus ridership. The Language Access Plan includes:

- Results of the Four Factor Analysis, including a description of the LEP population(s) served.
- Description of how DTCL provides language assistance services by language.
- Description of how DTCL provides notices to LEP persons about the availability of language assistance.
- Description of how DTCL monitors, evaluates, and updates the Language Access Plan.
- Description of how DTCL trains employees to provide timely and reasonable language assistance to LEP populations.

Methodology

Data sources and metrics employed in each section of the Language Access Plan are shown in **Table 26**.

TABLE 26: LANGUAGE ACCESS PLAN METHODOLOGY

Factor	Measure	Data Source
Factor 1: The number or proportion of LEP persons eligible to be served by DTCI	<ul style="list-style-type: none"> • Presence of limited English proficient populations in Loudoun County • Use of DTCI by limited English proficient populations • Countywide literacy rates of LEP persons in their native language 	<ul style="list-style-type: none"> • <i>American Community Survey (ACS) Estimates:</i> the analysis uses 2013-2017 Five-Year estimates (where available) for Loudoun County • <i>LC Transit On-Board Survey Data:</i> LC Transit conducted an on-board survey on both Local and Commuter Buses in March 2015. The surveying produced a sample size of 758 local and 940 Commuter surveys, which were then weighted based on the number of boardings on each trip by the number of completed survey received for that trip • <i>Operator Focus Groups:</i> On June 24, 2019, one focus group each was conducted with Local and Commuter Bus operators • <i>Loudoun County Literacy Council:</i> Email correspondence with Niki Daruwala, Executive Director
Factor 2: The frequency with which LEP persons use DTCI	<ul style="list-style-type: none"> • Frequency with which LEP riders make local bus trips • Frequency with which LEP riders make commuter bus trips • Spanish-speaking calls received by Local Bus customer service staff 	<ul style="list-style-type: none"> • <i>American Community Survey (ACS) Estimates</i> • <i>LC Transit On-Board Survey Data</i> • <i>Operator Focus Groups:</i> On June 24, 2019, one focus group each was conducted with Local and Commuter Bus operators • <i>LC Transit Customer Service Call Log:</i> For two weeks in May 2019, the Local Bus contract operator logged all interactions with LEP customers, noting the language and the type of request

2020-2023 Title VI Program

Factor	Measure	Data Source
Factor 3: The nature and importance of DTCL to LEP persons	<ul style="list-style-type: none"> • Ability to make trip if local bus were not available • Access to a vehicle for local bus riders • Trip purpose for local bus riders • Ability to make trip if commuter bus were not available • Trip purpose for commuter bus riders 	<ul style="list-style-type: none"> • <i>LC Transit On-Board Survey Data</i> • <i>Operator Focus Groups</i> • <i>Contract Vendor Receipts:</i> Receipts were provided for translation services, brochures, videos, and marketing materials
Factor 4: The resources available for LEP outreach and the associated costs	<ul style="list-style-type: none"> • Description of existing County LEP resources • Description of existing DTCL LEP resources 	<ul style="list-style-type: none"> • <i>Operator Focus Groups</i>

Four Factor Analysis Results

Factor I

Factor 1: The number or proportion of limited English proficiency persons eligible to be served or likely to be encountered by the recipient.

How LEP Persons Interact with Loudoun County Transit

LEP populations interact with DTCL by riding both the Local and Commuter Bus systems, interacting with operators, using the Commuter Bus Park and Ride lots, in-person communication at the DTCL and Commuter Services Division, and through email and phone communication. LEP persons also contact the contractor that operates the Local Bus service directly, through a customer service telephone number. Lastly, LEP persons interact with the agency through the website, using online maps, schedules, printed materials, and through employer outreach events such as commuter fairs.⁹

2020-2023 Title VI Program

Identification of LEP Communities and English Proficiency

Table 27 summarizes the language spoken at home for households in Loudoun County according to the American Community Survey.⁶ Approximately 67 percent of Loudoun County households speak English at home. The predominant non-English language group spoken at home is Spanish; 11 percent of households report that they speak Spanish at home. Of those 13,615 households, 23 percent are limited English speaking.

The next largest group is Other Indo-European Languages,⁷ which constitute eight percent of households. Of these 10,145 households, eight percent have limited English proficiency. All other languages are spoken by five percent or less of Loudoun County households. Overall, more than 30 percent of households speak a language other than English at home, which highlights the diversity of the County.

TABLE 27: LANGUAGE SPOKEN AT HOME BY LIMITED ENGLISH-SPEAKING STATUS⁸

Language / Language Group Spoken at Home	Household Estimate	Percent of Total Households	LEP Household (Percent of Language Group)	Not a LEP Household (Percent of Language Group)
English	85,533	67%	-	-
Spanish	13,615	11%	23%	77%
Other Indo- European Languages	10,145	8%	8%	92%
Other Asian or Pacific Island Languages	6,807	5%	4%	96%
Russian, Polish, or Other Slavic Languages	2,045	2%	12%	88%
Vietnamese	1,873	1%	32%	68%
Korean	1,826	1%	18%	82%

⁶ This data is only available from the U.S. Census in one-year estimates.

⁷ Other Indo-European languages include Scandinavian, Romance languages, and Indic languages.

⁸ American Community Survey One-Year Estimates, 2017 Table B16002: Household Language by Household, Limited English Speaking Status.

2020-2023 Title VI Program

Language / Language Group Spoken at Home	Household Estimate	Percent of Total Households	LEP Household (Percent of Language Group)	Not a LEP Household (Percent of Language Group)
Chinese (Including Mandarin and Cantonese)	1,589	1%	19%	81%
Arabic	1,408	1%	30%	70%
French, Haitian, or Cajun	1,353	1%	5%	95%
Other and Unspecified Languages	1,307	1%	3%	97%
Tagalog (Including Filipino)	1,288	1%	5%	95%
German or Other West Germanic Languages	980	1%	14%	86%

Table 28 elaborates on this analysis, ranking languages spoken at home by population five years of age and older. Information provided in this table identifies language spoken at home, other than English, and the size of that community in Loudoun County for all languages where 1,000 people or more reported speaking the language. The results show that 21 different non-English languages are spoken by at least 1,000 residents of Loudoun County. The language most commonly spoken at home is Spanish, by 11 percent of the County's population. The remaining languages, including languages native to Europe, Asia, and Africa, each constitute between one and three percent of the county population.

TABLE 28: TOP HOME LANGUAGES IN LOUDOUN COUNTY⁹

Language	Estimate of Persons	Share of County Population
Spanish	41,070	11%
Telugu	9,338	3%
Urdu	7,944	2%

⁹ American Community Survey 1-Year Estimates, 2017, Table B16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over. This data is currently only available in one-year estimates.

2020-2023 Title VI Program

Language	Estimate of Persons	Share of County Population
Vietnamese	5,217	1%
Korean	5,103	1%
Hindi	4,829	1%
Tamil	4,196	1%
Chinese (Including Mandarin and Cantonese)	3,692	1%
Arabic	3,295	1%
Persian (Including Farsi and Dari)	3,174	1%
Tagalog (Including Filipino)	3,014	1%
French (Including Cajun)	2,891	1%
Russian	2,734	1%
Nepali, Marathi, or Other Indic Languages	2,258	1%
Gujarati	2,207	1%
Punjabi	2,036	1%
Yoruba, Twi, Igbo, or Other Languages of Western Africa	1,894	1%
German	1,847	<1%
Malayalam, Kannada, or Other Dravidian Languages	1,635	<1%
Other Languages of Asia	1,265	<1%
Bengali	1,179	<1%

While there is significant language diversity in Loudoun County, most residents who speak a language other than English at home are also English proficient. **Table 29** identifies the languages spoken for which more than 1,000 people report that they speak English “less than very well.” The language with

2020-2023 Title VI Program

the largest share of people who speak English “less than very well” is Spanish, making up roughly five percent of the County population. Other languages on this list include Vietnamese, Korean, Urdu, Arabic, Chinese, Telugu, and Russian. However, for each of these languages, the number of residents speaking English less than very well makes up one percent or less of the County population.

TABLE 29: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH, POPULATION 5 YEARS AND OLDER¹⁰

Language	Speaks English “Less Than Very Well”	Share of County Population
Spanish	18,741	5%
Vietnamese	2,759	1%
Korean	1,993	1%
Urdu	1,913	1%
Arabic	1,611	<1%
Chinese	1,586	<1%
Telugu	1,297	<1%
Russian	1,113	<1%

While the American Community Survey identifies the languages spoken in Loudoun County as well as ability to speak English, the Loudoun County Transit On-Board Survey provides a snapshot of the residents and workers who use the County’s transit services. Forty-four percent of Local Bus survey respondents and 28 percent of Commuter Bus respondents reported speaking a language other than English at home (**Table 30**). Notably, the share of Local Bus respondents who speak a language other than English at home (44 percent) is higher than the ACS estimate of residents doing so in Loudoun County (30 percent).

TABLE 30: DO YOU SPEAK A LANGUAGE OTHER THAN ENGLISH AT HOME?

	Yes	No
Percent of Local Bus Riders	44%	56%
Percent of Commuter Bus Riders	28%	72%

¹⁰ American Community Survey One-Year Estimates, 2017, Table B16001: Language Spoken at Home by Ability to Speak English for the Population Five Years and Over. This data is only available in one-year estimates.

2020-2023 Title VI Program

On-board survey data also offers a snapshot of specific language barriers Loudoun County transit riders may face. **Table 31** summarizes how well respondents who reported speaking a language other than English at home speak English. Within this category, 28 percent of Local Bus respondents and eight percent of Commuter Bus respondents marked “less than very well.”

TABLE 31: HOW WELL DO YOU SPEAK ENGLISH?

	Speaks English “Very Well”	Speaks English “Less Than Very Well”
Percent of Local Bus Riders	72%	28%
Percent of Commuter Bus Riders	92%	8%

Table 32 and **Table 33** provide the primary languages spoken at home for survey respondents who do not speak English “very well.” For both Local and Commuter Bus, Spanish represented the largest share of respondents. Seventy-two percent of Local Bus respondents who reported not speaking English “very well” identified as Spanish-speaking, as did 22 percent of Commuter Bus respondents in this category. Local Bus respondents in this group also reported speaking French, Tagalog, Arabic, and Yoruba at home; Commuter Bus riders reported speaking Telugu, Chinese, Hindi, and Vietnamese at home.

TABLE 32: TOP LANGUAGES SPOKEN AT HOME FOR THOSE WHO DO NOT SPEAK ENGLISH “WELL” (LOCAL BUS)

Language	Percent of Respondents
Spanish	72%
French	4%
Tagalog	3%
Arabic	3%
Yoruba	3%

TABLE 33: TOP LANGUAGES SPOKEN AT HOME FOR THOSE WHO DO NOT SPEAK ENGLISH “WELL” (COMMUTER BUS)

Language	Percent of Respondents
Spanish	22%
Telugu	19%
Chinese	17%

2020-2023 Title VI Program

Language	Percent of Respondents
Hindi	10%
Vietnamese	8%

During focus groups conducted for the Language Access Plan, Local Bus operators reported that the most common LEP languages encountered are Spanish, French, Amharic, and Hindi, and that the bus information phone line occasionally receives calls from riders who speak only Spanish or French. Operators reported most frequently encountering LEP persons on routes 55, 56, 62, 72, 80, 82, and 84. Commuter Bus operators reported that most of the riders they encounter speak at least some English, with the most common other languages being Spanish, Hindi, Amharic, Vietnamese, French, and Telugu.

According to on-board survey data, Local Bus routes with a high share of non-native English speakers are Routes 62 (Ashburn Connector), 82 (Sterling Connector), 84 (Atlantic Connector), and 901 (Broad Run Farms/Cascades). Among Commuter Bus runs, Run 301 has the highest share of non-native English speakers. Commuter Bus operators identified Leesburg, Dulles South, Dulles North, and Wiehle-Reston East Station as bus stops where riders speaking little to no English were most commonly encountered.

Literacy Skills of LEP Populations in their Native Languages

The literacy skill level of LEP populations in Loudoun County is a critical component of the Language Access Plan. Unfortunately, there is limited information on literacy rates of LEP persons in Loudoun County. The Loudoun County Literacy Council reports that up to 400 people enroll in their adult literacy program annually and that the largest student demographic contingents speak Spanish, Farsi, Urdu, and Arabic.

The on-board survey summarized in this Language Access Plan was administered as a paper survey form and therefore only reflects the responses of bus riders who are able to read and fill out a written survey form. However, Loudoun County Literacy Council reports that more than 90 percent of their adult students are not literate in their native language. Therefore, direct translation of text into LEP languages should not be the only method LCT uses to reach LEP populations. Instead, DTCL may want to incorporate more graphic and visual icons into notices and vital documents.

Service Gaps Due to Language Barriers

During focus groups conducted for the Language Access Plan, bus operators (particularly Local Bus operators) reported that LEP persons often need help with trip planning and navigation. Operators reported that maps, GPS-based mobile apps, and other multilingual riders were resources they commonly used to help LEP persons. Many operators are also proficient in languages other than English. Among Local Bus operators roughly 25 different languages are spoken. Despite this, operators reported that communication issues with LEP passengers do occur from time to time.

According to Local Bus operators, LEP riders often use LCT's phone service for assistance, the number for which is printed on every bus stop sign. The employees who answer the phones speak multiple

2020-2023 Title VI Program

languages and have access to a translation hotline should they encounter an LEP person whose language they do not speak. While most LEP riders are able to get assistance in a language they understand, operators have nevertheless reported occasional instances where this has not occurred. Operators suggested that there is room for improvement in providing access to information for LEP riders.

Factor 2

Factor 2: The frequency with which limited English proficient persons come into contact with the program.

Local Bus

On-board survey results found that LEP persons regularly use both Local and Commuter Bus service. At least half of Local Bus riders identifying as LEP reported riding the bus three times per week or more. Local Bus operators confirmed that they will frequently see the same LEP passengers on their route, sometimes daily. In addition, employees who answer the LCT assistance phone hotline reported receiving between 10 and 15 calls per day from people who only speak Spanish. **Table 34** summarizes the frequency with which Local Bus trips are made by LEP respondents.

TABLE 34: FREQUENCY WITH WHICH TRIP IS MADE ON LOCAL BUS (LEP RESPONDENTS)

Trip Frequency	Percent of LEP Respondents
Less than once a week	8%
1-2 days per week	13%
3-4 days per week	20%
5 or more days per week	30%
No Response	29%

Commuter Bus

The on-board survey found that LEP persons use Commuter Bus service more frequently than Local Bus. 69 percent of LEP respondents to this survey question reported using Commuter Bus five or more days per week; in all, 93 percent reported using the service at least three days per week. **Table 35** summarizes the frequency with which Commuter Bus trips are made by LEP respondents.

TABLE 35: FREQUENCY WITH WHICH TRIP IS MADE ON COMMUTER BUS (LEP RESPONDENTS)

Trip Frequency	Percent of LEP Respondents
Less than once a week	1%
1-2 days per week	3%

2020-2023 Title VI Program

Trip Frequency	Percent of LEP Respondents
3-4 days per week	24%
5 or more days per week	69%
No Response	3%

During the Commuter Bus operator focus group, operators reported rarely encountering riders with whom they could not communicate in English. However, operators did report that despite being able to speak some English, some riders are not fluent in English.

Factor 3

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.

Local Bus

The on-board survey also asked riders about their trip purpose, the availability of vehicles, and how they would make the trip if DTCl transit services were not available. Results shown in this section encompass LEP respondents who reported speaking English “well,” “not well,” or “not at all.” **Table 36** reports on LEP Local Bus respondents’ alternative trip modes. If Local Bus were not available, 30 percent within this category could drive, get dropped off, or ride with someone; however, the remaining 70 percent would face a much more difficult alternative, including 14 percent who would not make the trip at all. These results confirm that LCT provides a vital service to Local Bus LEP riders.

TABLE 36: LEP RESPONDENTS’ ALTERNATIVE TRIP MODE FOR LOCAL BUS RIDERS

Replacement Mode	Percent of LEP Riders
Walk or Wheelchair	29%
Drive	2%
Get Dropped Off	25%
Ride with Someone	3%
Bicycle	6%
Taxi	18%
Would not Make the Trip	14%
No Response	3%

2020-2023 Title VI Program

The survey also inquired about vehicle availability, asking respondents if they had access to a car, truck, or SUV to make the same trip (**Table 37**). Once again confirming the essential role LCT Local Bus plays in many Loudoun residents' lives, an overwhelming 83 percent of all LEP respondents reported not having access to a vehicle; 11 percent reported having access.

TABLE 37: LEP VEHICLE AVAILABILITY FOR LOCAL BUS RIDERS

Vehicle Availability	Percent of LEP Riders
Yes	11%
No	83%
No Response	6%

Table 38 summarizes trip purpose for Local Bus LEP respondents. Approximately 30 percent of trip origins and 28 percent of trip destinations are work-related. Respondents also reported using Local Bus to access shopping and food services, school, and medical appointments.

TABLE 38: LEP TRIP PURPOSE FOR LOCAL BUS RIDERS

Trip Purpose	Trip Origin	Trip Destination
Work	30%	28%
Home	27%	29%
Shopping or Meal	9%	11%
School	5%	4%
Medical Appointment	1%	2%
Job-Related Business	3%	2%
Personal Trip	3%	2%
Other	0%	0%
No Response	21%	21%

Commuter Bus

The on-board survey asked Commuter Bus riders about their trip purpose and how they would make the trip if LCT were not available. As was the case for Local Bus, results shown in this section encompass LEP respondents who reported speaking English "well," "not well," or "not at all." However, unlike the Local Bus survey, the Commuter Bus survey did not inquire about vehicle availability.

2020-2023 Title VI Program

Regarding alternative trip modes, **Table 39** displays that if Commuter Bus were not available, 27 percent of respondents would drive or get dropped off at their final destination, 51 percent would drive and park at a Metrorail station or get dropped off at a Metrorail station, two percent would use another transit service such as Fairfax Connector or VRE, and six percent would take a taxi or share the ride. Twelve percent of LEP respondents would not make the trip at all.

While a combined 52 percent of LEP respondents reported that they would drive either to a Metrorail station or to their final destination, 48 percent of respondents apparently do not have access to a vehicle for a regular commute and therefore are reliant on LCT.

TABLE 39: LEP RESPONDENTS' ALTERNATIVE TRIP MODE FOR COMMUTER BUS RIDERS

Replacement Mode	Percent of LEP Riders
Drive to Final Destination	23%
Get Dropped Off or Ride with Someone to Final Destination	4%
Drive to Metrorail and Park	29%
Get Dropped Off or Ride with Someone to Metrorail	22%
Another Transit Service	2%
Taxi or Rideshare	6%
Some Other Way	3%
Would not Make the Trip	12%

Table 40 summarizes the purpose of the trip origins and destinations for Commuter Bus LEP survey respondents. Given that Commuter Bus is designed to serve home-to-work commuters, 93 percent of trip origins reported were home-based, and all trip destinations reported were places of employment.

TABLE 40: LEP TRIP PURPOSE FOR COMMUTER BUS RIDERS

Trip Purpose	Trip Origin	Trip Destination
Work	-	100%
Home	93%	-
Other	7%	-

Factor 4

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

Overview of Resources Available

Loudoun County has had a Countywide Language Access Plan in place for nearly 10 years, and accordingly has countywide resources available for LEP outreach and translation needs specific to transit services. Loudoun County's Department of Transportation and Capital Infrastructure (DTCI) translates Local Bus schedules into Spanish for routes in the Sterling area, which has the highest proportion of Spanish language speakers, and makes them available on the County's website; Spanish-language schedules are not available for Metro-Connection or Commuter Bus services. The County also translates into Arabic, French, Tagalog, Yoruba, Mandarin, Vietnamese, Hindi, Telegu, Farsi, Korean, and Urdu a paragraph of its Title VI Notice (which is posted on all Local and Commuter Buses) providing phone and website contacts for translation services.

In addition, DTIC has a Spanish-speaking staff person who can assist any Spanish-speaking LEP individuals calling the office for transit services. The contractor that operates Local Bus service also has staff who provide Spanish language translation to riders calling with questions or information requests; the Language Line may be accessed for assistance in other languages. LEP riders with questions about Commuter Bus service call DTIC, where access to the Language Line is available. The Language Line will provide direct translation between the LEP individual and the staff person assisting them at no cost to the individual. The Loudoun County website can be translated through Google translate, making it accessible in more than 100 languages.

Loudoun County is capable of providing language accommodation at all public meetings, if translation is requested in advance or dynamically through the use of the Language Line. In recent years Loudoun County Transit staff have attended public outreach events associated with their Transit Development Plan, and employer outreach events associated with the County's Transportation Demand Management program.

Assessment of Available Resources and Recommended Strategies

Based on an assessment of Loudoun County's existing language resources and current rider needs, the following overarching findings were identified:

1. Loudoun County has an array of language access resources available to limited-English speaking residents and workers; however, Local and Commuter Bus riders are not always aware of these resources and do not necessarily know to ask for these resources. There is a need to advertise and create awareness of these resources within LEP communities.
2. LEP riders often have trouble understanding how to ride the bus and how to navigate the transit system. There is an opportunity for DTIC to do proactive outreach in the community to provide information and resources before first-time riders use the bus.
3. Loudoun County has posted Title VI notices and information on language assistance, but these announcements can be made more clear and straightforward.

2020-2023 Title VI Program

The strategies that DTCI has identified to meet the needs of LEP riders fall within the three main categories summarized above. In order to better advertise existing language access resources, DTCI with resources and staff support from the County Accessibility Manager, will:

- Ensure that tear sheets or “point-to” cards remain available on all vehicles in the following languages: Spanish, Vietnamese, Korean, Urdu, Arabic, Chinese, Telugu, and Russian. Ensure that all operators are properly trained to interact with riders who use these cards.
- Ensure DTCI’s schedule information, available in General Transit Feed Specification (GTFS), is kept up to date. This will permit that LEP riders who rely on mobile apps can use them to plan trips and navigate the system.
- On Local Bus vehicle windows, install English/Spanish language notifications that advertise the following:
 - Bilingual resources on the DTCI website.
 - Bilingual phone services via the operators call center.

In order to be proactive in the community and conduct outreach to first-time LEP riders, DTCI should complete do the following:

- Create a graphic-heavy *How to Ride Guide* booklet, including an easy-to-use system map, and make it available online in both English and Spanish. Translation into additional languages should be available upon request.
- Identify and reach out to key community-based organizations (CBOs) who work with recent immigrants, particularly in the Latino community, to provide information on DTCI (such as distribution of the *How to Ride Guide*, schedules, or other information). These efforts should supplement efforts to build relationships with CBOs described in the Public Participation Plan.
- Invite a stakeholder from a community-based organization that serves LEP populations to serve on the Loudoun County Transit Advisory Board when a vacancy becomes available.

Loudoun County will update notices posted on their website and on printed materials on their vehicles making language assistance resources known. This includes the following:

- Update the existing Title VI Notice posted on all local and commuter buses to include a Spanish translation and bullet directing riders to the County website in all Safe Harbor languages; and
- Update County webpage on Language Assistance (Title VI) to read “Your Rights to Language Assistance Under Title VI” and make entire webpage visible in all Safe Harbor languages.

FTA regulations require that vital documents are made available in all of the County’s “Safe Harbor” languages. For Loudoun County Transit, vital documents include:

- System maps and schedules.
- All printed materials for ADA paratransit services, including promotional brochures, application forms, and passenger policies and procedures.
- Title VI notices and complaint forms.

2020-2023 Title VI Program

- The LCT *How to Ride Guide*.
- All public-facing documents regarding language assistance, including notices advising LEP individuals of free language assistance services.
- All public-facing documents regarding rules for riding the bus.
- Information about fares, payment methods, and how to ride.
- Any intake or application forms.
- Written notices of rights, denials, losses, or decreases in benefits or services.

For Loudoun County Transit, the following languages qualify as Safe Harbor Languages:

- Spanish
- Vietnamese
- Korean
- Urdu
- Arabic
- Chinese
- Telugu
- Russian
- French¹¹

LCT will make all of these documents available electronically in all Safe Harbor languages and will provide print copies in any Safe Harbor language upon request. **Appendix A** at the conclusion of this document consists of maps showing concentrations of linguistically isolated Safe Harbor language speakers in Loudoun County.

¹¹ While French does not qualify as a Safe Harbor language based strictly on Census data, it was the second most-common language that LEP local bus riders reported speaking in the most recent LCT rider survey. LCT operators also reported that it was one of the languages they commonly encountered. It has therefore been included in this list.

2020-2023 Title VI Program

Recommended Strategies - Costs

TABLE 41: RECOMMENDED LANGUAGE ACCESS STRATEGIES

Recommendation Task	Languages	Responsible Party	Cost Description	Year 1	Year 2	Year 3	Total Cost
Vital Document translation into all Safe Harbor languages	All Safe Harbor Languages	DTCI Staff and Accessibility Services Manager	Translation ranges from 16-22 cents/word with a \$50 minimum	Translation costs of at least \$50	\$0	\$0	At least \$50
Develop tear sheets or “point-to” cards available on all vehicles	Safe Harbor Languages	Accessibility Services Manager (translation and design); DTCI Staff (distribution to vehicles)	Translation ranges from 16-22 cents/word with a \$50 minimum; printing costs are additional	\$50 translation costs plus printing costs	\$0	\$0	\$50 plus printing costs
Distribute tear sheets and train operators to use tear sheets on vehicles	N/A	DTCI Staff and Accessibility Services Manager	Cost of staff time	\$0	\$0	\$0	\$0

2020-2023 Title VI Program

Recommendation Task	Languages	Responsible Party	Cost Description	Year 1	Year 2	Year 3	Total Cost
Update GTFS	N/A	DTCI Staff	Work with a consultant to develop GTFS and train DTCI staff; updates will be done in-house as part of service changes	\$10,000	-	-	\$10,000
Install English/Spanish language window clings on local bus vehicles advertising website and multilingual resources	English, Spanish	DTCI Transit	Translation costs and static cling covers to post on window	Static cling covers for 35 local vehicles (\$95); Translation into Spanish (\$50); printing in-house	-	-	Variable
Create a graphic-heavy <i>How to Ride Guide</i>	Safe Harbor Languages	DTCI Transit; Communications Staff	In-house design	\$0	\$0	\$0	\$0

2020-2023 Title VI Program

Recommendation Task	Languages	Responsible Party	Cost Description	Year 1	Year 2	Year 3	Total Cost
Translations and printings of <i>How to Ride Guide</i> available upon request	Safe Harbor Languages	Accessibility Manager	Translation costs; Brochure printing costs	Assuming 16 cents/word for 200 words or \$50 minimum; printing costs additional	Printing costs	Printing costs	\$50 plus printing costs
Additional translation and printing, as requested	TBD	DTCI Transit; Accessibility Manager	Translation costs; Brochure printing costs	Assuming \$50 minimum for each translation; printing costs additional	Assume \$50 minimum for each translation; printing costs additional	Assume \$50 minimum for each translation; printing costs additional	\$50 per language plus printing costs, number of languages TBD
Identify and reach out to key community-based organizations (CBOs)	Spanish, Arabic-speaking, French-speaking African, Indian CBOs	DTCI Transit; Accessibility Manager	Staff time	\$0	\$0	\$0	\$0
Update County webpage on language assistance	Safe Harbor Languages	DTCI Transit; Accessibility Manager	Staff time	\$0	\$0	\$0	\$0

2020-2023 Title VI Program

Recommendation Task	Languages	Responsible Party	Cost Description	Year 1	Year 2	Year 3	Total Cost
Update existing Title VI Notice	Safe Harbor Languages	DTCI Transit; Accessibility Manager	Staff time; in-house printing	\$0	\$0	\$0	\$0
Invite a member of a CBO serving LEP populations to serve on the Transit Advisory Board	Spanish	DTCI Transit	Staff time	\$0	\$0	\$0	\$0

Language Access Plan & Monitoring, Evaluating and Implementation

Each year as the DTCL operator contract renews, County staff will review the following:

- Confirm that the operator has fulfilled contractual requirement to train operators on Title VI procedures, including language assistance.
- Solicit feedback from operators at monthly safety and operations meetings on the effectiveness of current language assistance resources.
- Update the *How to Ride Guide*, as needed and re-print, if necessary.
- Hold an internal meeting with staff from DTCL (include transit and transportation demand management staff) and the County Accessibility Manager to discuss usage numbers from the Language Line, resource planning for outreach activities, and next steps in developing and maintaining a mobile application.

Requirements for Fixed Route Transit Providers

This section addresses Title VI requirements specifically for fixed route transit providers. The Loudoun County Department of Transportation and Capital Infrastructure (DTCI) operates greater than 50 vehicles during peak period service. Therefore, DTCL meets the Federal Transit Administration threshold for establishing transit service standards and policies and for transit service monitoring analysis.

Transit Service Standards and Policies

This section establishes transit service standards and policies for DTCL's Commuter and Local Bus services, per the guidelines outline in FTA C 4702.1B. For the purposes of this section, Local Bus standards and policies are applicable to Metro-Connection service. The County incorporates an ongoing review of the services it provides to ensure that service is planned and operated in an equitable manner. This means the distribution of service levels are aligned with demand, and minority and low-income populations receive the same quality of transit service as the overall population.

Vehicle Load

Commuter and Local Bus

The vehicle load standard is expressed as the ratio of passengers to the total number of seats on a vehicle at its maximum load point. For both Commuter and Local Bus service, during all service hours, the DTCL vehicle load standard is 1.25.

LCT Commuter and Local Bus vehicle types, including seats available, are summarized in **Table 42**.

TABLE 42: LCT COMMUTER AND LOCAL BUS VEHICLES

Service Type	Vehicle	Seats Available
Commuter Bus	Motor Coach Industries (MCI) 45-Foot Coach	55
	Van Hool 45-Foot Coach	55
Local Bus / Metro-Connection	Gillig Low-Floor 40-Foot Transit Bus	40
	International 4300 Body-On-Chassis	30
	Ford E-450 Body-On-Chassis	20
	Chevrolet 5500 Body-On-Chassis	30
ADA Paratransit	Ford E-350 Body-On-Chassis	12

Vehicle Headway

Commuter Bus

Loudoun County Commuter Bus service operates weekdays during peak-commuting times, departing between 4:38 a.m. and 8:35 a.m. and returning between 4:03 p.m. and 8:24 p.m. Commuter Bus also operates one midday run that arrives between 2:09 p.m. and 2:54 p.m. DTCL utilizes a run rather than a route structure for service from Loudoun County Park and Rides to various destinations in Arlington County and Washington, DC. Depending on destinations and origins, runs are grouped into two types: Eastern Loudoun and Western Loudoun. By run type, the Commuter Bus headway is defined as the amount of time between two vehicles traveling from a specific origin point to the same general destination. For example, one a.m. headway would be the amount of time between vehicles traveling from Dulles South Park and Ride to any destinations in Washington, DC. One p.m. headway would be amount of time between two vehicles traveling from H and 4th Streets to any destinations in Loudoun County.

As a standard, Commuter Bus headways should not exceed 30 minutes. Morning and afternoon Commuter Bus headways are currently variable, depending on the service run type and origin point. Because Loudoun County's service is structured around runs rather than fixed-route schedules, passengers are encouraged to rely more on information regarding where their specific run travels instead of published headways.

Local Bus

Local Bus service, including Metro-Connection service, is primarily a weekday service operating mostly between the hours of 7:00 a.m. and 7:00 p.m. Some Metro-Connection routes begin service as early as 4:45 a.m. and end as late as 9:33 p.m. Routes 70 (Leesburg-Sterling) and 82 (Sterling Connector) operate until 10:00 p.m. Limited Saturday service is provided on Route 84 (Atlantic Connector).

For Local Bus service, a vehicle headway is defined as the amount of time between two vehicles traveling in the same direction on a given bus line. As a standard, Local Bus vehicle headways are not to exceed 60 minutes during weekday peak periods and 70 minutes during weekday off-peak and weekend periods.

On-Time Performance

Commuter Bus

Commuter Bus on-time performance is a measure of runs that leave first origin points on schedule. All Commuter Buses are equipped with GPS devices that are monitored daily. Schedule changes or adjustments are made one or two times per year; on-time performance is also spot-checked based on the prevalence of customer complaints. As a policy, a Commuter Bus is considered late if departing a first origin point more than one minute late and is considered early if departing ahead of schedule. The LCT Commuter Bus standard for on-time performance is 85 percent.

Local Bus

Local Bus on-time performance is defined as the percentage of individual trips on a route completed as scheduled. This measure is calculated using the first (departure time) and last (arrival time) time points.

2020-2023 Title VI Program

The on-time range for Local Bus is between zero minutes early and five minutes late. The LCT Local Bus standard for on-time performance is 85 percent.

DTCI standards for vehicle load, headway, and on-time performance are summarized in **Table 43**.

TABLE 43: DTCI TRANSIT SERVICE STANDARDS: VEHICLE LOAD, VEHICLE HEADWAYS, AND ON-TIME PERFORMANCE

Measure	Standard	
	<i>Commuter Bus</i>	<i>Local Bus</i>
Vehicle Load	1.25	1.25
Headway	Not to exceed 30 minutes	Peak: Not to exceed 60 minutes Off-Peak/Weekend: Not to exceed 70 minutes
On-Time Performance:	Late: Greater than one minute late leaving first departure point Early: More than zero minutes ahead of schedule System Goal: 85% On-Time	Late: More than five minutes behind schedule Early: More than zero minutes ahead of schedule System Goal: 85% On-Time

Service Availability

Service availability is a general measure of the distribution of routes within a transit provider's service area or the span of service. The standard for service availability is set by the needs of the community for public transportation.

Commuter Bus

Loudoun County Commuter Bus service is a market-driven, express service that operates closed-door once it departs the assigned Park and Ride lot and operates open-door to only discharge passengers along the destination route. In the County, access to a vehicle essentially guarantees access to a Park and Ride lot. Thus, service availability for Loudoun County Commuter Bus is a function of vehicle availability by household. According to 2013-2017 Five-Year American Community Survey estimates, approximately 98 percent of Loudoun County households have access to at least one vehicle. When analyzing between minority and non-minority Census Block Groups, this figure remains the same: 98 percent of total households in each of the two types of Block Groups have access to at least one vehicle.

Table 44 provides a list of Park and Ride lots with Commuter Bus service and the utilization of each lot. Given that Park and Ride users may arrive at lots by private car, carpool, transit, or on foot, and may choose to board transit or travel by another mode after arriving, utilization is expressed both as the

2020-2023 Title VI Program

percentage of Commuter Bus boardings divided by the number of the total spaces available, as well as the percentage of vehicles parked divided by total spaces available. Data from May 9, 2019 was utilized to calculate utilization percentages.

By either measure shown, Park and Rides served by Loudoun County Transit are most utilized in the eastern portion of the County as well as in Purcellville, where Park and Ride lots serve as the sole origin points for transit-based trips to job centers in Washington, DC and Arlington. Overall, the most utilized Park and Ride lots include Purcellville, Brambleton, Loudoun Station, and Lowes Island. The least utilized Park and Ride lots include Dulles South-Millstream Drive, Dulles Town Center, Our Lady of Hope, and Harmony. The arrival of Metrorail Silver Line service in east Loudoun County in the next two years will likely affect Park and Ride utilization rates.

TABLE 44: COUNTY PARK-AND-RIDE LOT UTILIZATION

Park and Ride (Number of Spaces)	Commuter Bus Boardings / Spaces	Vehicles Parked / Spaces
Ashburn North (190)	53%	67%
Brambleton (100)	110%	98%
Broad Run Farms (48)	10%	2%
Broadlands (160)	78%	128%
Cascades (55)	65%	40%
Dulles North (750)	97%	101%
Dulles South – Millstream Dr. (250)	21%	17%
Dulles South I (100)	56%	61%
Dulles South II (300)	85%	84%
Dulles Town Center (100)	28%	36%
East Gate (218)	82%	77%
Goose Creek Village (83)	65%	77%
Harmony (250)	48%	59%
Leesburg (691)	78%	78%
Loudoun Station (300)	128%	101%

2020-2023 Title VI Program

Park and Ride (Number of Spaces)	Commuter Bus Boardings / Spaces	Vehicles Parked / Spaces
Lowes Island (65)	145%	95%
Our Lady of Hope (150)	30%	21%
Purcellville (68)	126%	121%

Policies contained in the 2019 Countywide Transportation Plan (CTP) specific to the planning and provision of County Park and Ride service are as follows:

- **Urban Policy Area:** Transit services are planned to include commuter buses, however the CTP envisions the use of enhanced bus stops and transit centers along designated Transit Corridors rather than from Park and Ride lots where pedestrian and bicycle access is given priority.
- **Suburban Policy Area:** Regional Park and Ride lots shall be considered for placement at the outskirts of communities and neighborhoods to attract nearby residents to depart the public road network and shift to transit prior to reaching the County's most demanded arterial roads.
- **Transition Policy Area:** Regional Park and Ride lots shall be considered for placement along arterial corridors in the Transition Policy Area to provide options to local residents as well as travelers from rural areas and those traveling from outside of the County.
- **Rural Policy Area:** The County shall study and seek public input regarding opportunities for regional Park and Ride lots along primary road corridors in the rural area to provide options to rural communities as well as travelers from outside of the County, thereby mitigating some pressures on the County road network.

Local Bus

Based on recent population data, approximately 81,700 people, or 22 percent of the County's population, live within a quarter-mile of a Loudoun County Transit Local Bus stop. The population density within Loudoun County Transit's Local Bus service area is estimated to be seven persons per acre, with routes primarily distributed within the Towns of Purcellville and Leesburg, as well as around the Sterling and Ashburn communities.

The 2019 Loudoun County Comprehensive Plan includes a vision for public transportation facilities and for provision of transit service. According to the plan, much of Loudoun's future growth should occur in the County's Urban Policy Area, including transportation hubs offering a wide array of transportation mode choices, such as walking, biking, driving, and transit. Policy guidance for the County's transportation network is further outlined in the Loudoun County 2019 Countywide Transportation Plan, which includes a Transit Infrastructure Design Toolkit. Bus stop placement guidelines for stop spacing call for stops in the Urban Policy Area to occur generally no less than once every 3,000 feet along a route. This Title VI Program adopts this recommendation as a Local Bus service availability standard.

Transit Amenities

Commuter Bus

Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Park and Ride lots served by Loudoun County Transit should include the following amenities and be compliant with ADA requirements:

- Convenient and safe bus access
- Pedestrian access
- Bicycle racks or lockers
- Clearly and properly placed signage
- Schedules, services, and fare information
- Properly sized bus shelters and benches
- Well lit, paved, and striped for parking.

Park and Ride lots are often located along or at the intersection of arterial or major collector roads, near activity centers (such as commercial or mixed-use centers, schools, or other destinations), and in safe and secure locations that provide convenient access.

Local Bus

As a policy, all Local Bus stops located in the public right-of-way are to have clearly-marked bus stop signs indicating the routes serving the stop. Where stops are located on private property, signs are to be placed when permitted. Transit stops should either be located within 30 feet of an overhead street light or include lighting within the shelter if provided.

Benches for passengers waiting for the bus can be either freestanding or part of a shelter design and should be provided wherever possible. Shelters at new Local Bus stops should be considered at stop locations central to activity centers, such as hospital, health clinic, education institutions, senior housing facilities, and government buildings, or at transfer points where ridership is anticipated to meet or exceed 20 passenger boardings per day.

Vehicle Assignment

Vehicle assignment refers to the process by which transit vehicles are placed into service and on routes throughout the system. The County's policy is that the age of vehicles used for Commuter Bus and Local Bus, including Metro-Connection, services shall not exceed 12 years. The chassis of a body-on chassis bus should be replaced every five years. Loudoun County Transit assigns types of vehicles to routes based on the type of service and volume of ridership.

Commuter Bus

For the Commuter Bus service, over-the road coach buses are assigned. The Commuter Bus service provides closed-door, express service between park and ride lots in Loudoun County and Arlington County and downtown Washington, DC. The shortest passenger trip duration is 35 minutes and the longest is 2 hours and 15 minutes. Each coach bus is equipped with a hydraulic wheelchair lift and

2020-2023 Title VI Program

properly positioned seats that fold to provide wheelchair locations with proper industry-approved tie downs.

Commuter Buses, the majority of which are County-owned rather than leased (except for smaller shuttle buses), are often assigned to different route destinations in order to “even-out” the mileage of the fleet and are rotated within the fleet. Forty-five-foot MCI buses are generally assigned to long haul routes into Washington, DC, and 30-foot Ford shuttle buses are used infrequently only as needed. DTCI does not assign vehicles to routes based on an age standard.

Local Bus

The majority of DTCI’s Local Bus vehicles were built during or after 2013. Local Bus vehicles are leased on three-year contracts and assigned by size rather than by age. 40-foot Gillig buses are generally assigned to Metro-Connection service; International and Chevrolet vehicles serve predesignated higher demand routes; and Ford vehicles generally service lower demand routes.

Transit Service Monitoring

Per FTA C 4702.1B, providers of public transportation that operate 50 or more fixed route vehicles in peak service and in an urbanized area of over 200,000 in population are required to monitor transit service relative to agency-determined system-wide service standards. Adherence to these standards are compared for minority transit routes and non-minority. This section presents the results of this assessment.

Minority Routes

Commuter Bus

DTCI Commuter routes only make limited stops within the County before implementing long-haul, express service to Washington, DC. Service consists of a series of closed door “runs” from Park and Ride lots to final employment destinations in Washington, DC, and Arlington, VA, rather than circular transit routes with local stops. FTA’s revenue miles methodology, which is used to calculate minority routes for Local Bus service, is therefore not applicable to DTCI Commuter routes.

Loudoun County has adapted FTA’s standard for commuter rail service equity analyses within this Title VI Program, which suggests using a three-mile buffer around commuter rail services. Although FTA does not provide direct guidance on the use of Census data to categorize limited stop commuter service as minority or non-minority, FTA C 4702.1B states that “a commuter bus that picks up passengers in generally non-minority areas and then travels through predominately minority neighborhoods but does not pick up passengers who live closer to downtown might be more appropriately classified as a non-minority route, even if one-third of the route mileage is located in predominately minority Census Block or Census Block Groups.” In this Title VI Program, this explanation was applied to include Loudoun County Park and Rides with Commuter Bus service.

Adapting this methodology, a three-mile buffer was drawn around all Loudoun County Park and Ride lots served by Loudoun County Transit in published schedules. The run type was deemed to be

2020-2023 Title VI Program

“minority” if a third or more of the Census Block Groups within that buffer were minority Census Block Groups (having a minority population percentage exceeding 42.3 percent).

Based on this methodology, all Eastern Loudoun runs (originating at Dulles North Town Center, Dulles South, Brambleton, East Gate, Ashburn North, or Loudoun Station Park and Rides) are classified as minority runs. All Western Loudoun runs (originating at Purcellville, Harmony, or Leesburg Park and Rides) are classified as non-minority runs. Runs are organized by origin and run type in **Table 45**.

TABLE 45: MINORITY AND NON-MINORITY RUNS BY RUN ORIGIN FOR COMMUTER BUS

Run Origins	Run Type	Runs
Dulles North Town Center, Dulles South, Brambleton, East Gate, Ashburn North, Loudoun Station	Minority	Runs 101 – 111, Runs 201 – 211, Runs 251 – 253, Runs 301 – 309, Runs 501 – 511, Runs 601 – 612, Runs 651 – 654, Runs 701 - 708
Purcellville, Harmony, Leesburg	Non-Minority	Runs 401 – 420, Runs 800 - 823

Local Bus

FTA defines a minority transit route as one in which at least one-third of the revenue miles traveled on the route are located within a Census Block Group where the minority population exceeds the percentage minority population in the service area overall. According to the 2013-2017 Five-Year American Community Survey, 42.3 percent of Loudoun County residents are minorities. Therefore, to qualify as a minority route, a Loudoun County Local Bus route must have at least one-third of its revenue miles pass through Census Block Groups with minority population percentages exceeding 42.3 percent.

Table 46 lists Local Bus routes alongside their status as a minority or non-minority route. Fourteen Local Bus routes are classified as minority; 11 are classified as non-minority.

TABLE 46: LOCAL BUS MINORITY ROUTE STATUS

Route Number	Description	Minority Route
54	Safe T Ride	Yes
55	Exeter/Tuscarora	Yes
56	Rust/Ida Lee/County Complex	No
57	Village at Leesburg/Wegmans	Yes

2020-2023 Title VI Program

Route Number	Description	Minority Route
62	Ashburn Connector	Yes
70	Leesburg/Sterling	Yes
72	Wiehle Express	Yes
80	Sugarland Run/Sterling	Yes
81	Countryside Connector	No
82	Sterling Connector	Yes
84	Atlantic Connector	Yes
87X	Dulles Town Center/Wiehle-Reston East Express	No
88X	StoneSprings Hospital, Stone Ridge, East Gate/Wiehle-Reston East Express	Yes
901	Potomac Falls/West Falls Church Metro Station	No
902	West Falls Church Metro Station/Potomac Falls	No
921	Harmony/Leesburg/Wiehle-Reston East Metro Station	No
922	Wiehle-Reston East Metro Station/Leesburg/Harmony	No
923	Goose Creek Village/Broadlands/Wiehle-Reston East Metro Station	Yes
924	Wiehle-Reston East Metro Station/Broadlands/Goose Creek Village	No
925	Loudoun Station/Dulles North/Wiehle-Reston East Metro Station	No
926	Wiehle-Reston East Metro Station/Loudoun Station	No
927/928	Wiehle-Reston East Metro Station/Dulles North/Loudoun Station/Broadlands/Goose Creek/Leesburg/Harmony	Yes
931/932	Purcellville/Wiehle-Reston East Metro Station	No
985	Sterling/Wiehle-Reston East Metro Station	Yes

Route Number	Description	Minority Route
990/992/993/994	Wiehle-Reston East Metro Station/Southwest Sterling Employer Sites	Yes

Table 47 displays the percentage of routes or runs classified as minority and non-minority for Commuter Bus and Local Bus service. For both services, more routes or runs are classified as minority than non-minority.

TABLE 47: MINORITY AND NON-MINORITY ROUTE / RUN CLASSIFICATIONS FOR COMMUTER BUS AND LOCAL BUS

Route Classification	Commuter Bus	Local Bus
Percent Minority Routes or Runs	66%	54%
Percent Non-Minority Routes or Runs	34%	46%

Analysis of Service Standards and Policies Performance by Route Classification

Vehicle Load

Commuter Bus

Commuter Bus accordance with the County's vehicle load standard was analyzed using ridership data from May 2019. This assessment evaluates a.m. passenger boardings only to provide a snapshot of vehicle load conditions. Morning boardings were assumed to account for all daily ridership based on the assumption that the vast majority, if not all, of morning Commuter Bus riders will return to their origin point during the p.m. period using Commuter Bus. To estimate average vehicle loads during the evaluation period, total ridership during the month was divided by the total number of bus runs during the period (generally, one daily). This was divided by the number of seats on the bus commonly assigned to the run to calculate average vehicle load.

The average vehicle load factor on minority Commuter Bus runs was 0.66 and the average load factor for non-minority runs was 0.68. Neither average load factor exceeded Loudoun County's maximum load standard of 1.25.

Local Bus

Average vehicle load for local buses in Loudoun County was analyzed using data from May 2019. The County summarizes vehicle load at the route-level on both a daily and monthly basis. To estimate average vehicle loads during the evaluation period, total ridership during the month was divided by the total number of bus trips during the period. This was divided by the number of seats on the bus commonly assigned to the route to calculate average vehicle load.

2020-2023 Title VI Program

Based on data from the analysis period, the average load factor for Local Bus minority routes was 0.36 and the average load factor for non-minority routes was 0.27. Neither average load factor exceeded Loudoun County's maximum load factor standard of 1.25.

Vehicle Headway

Commuter Bus

The Commuter Bus vehicle headway standard is defined as the amount of time between two vehicles by run type traveling from a specific origin point to the same general destination. Commuter Bus headways should not exceed 30 minutes. This analysis examined published headways for Eastern Loudoun and Western Loudoun runs traveling from sites in Loudoun County to and from Washington, DC, and Arlington, Virginia. To complete the evaluation, published times between vehicles traveling from each Loudoun County site to any destination in the District or Arlington were averaged. Runs traveling to both Washington, DC, and Arlington were "double-counted" to determine headways to destination sites.

For example, Eastern Loudoun Run 210W is scheduled to depart Dulles South at 6:30 a.m. before serving Rosslyn and various sites in Washington, DC. Run 206 leaves Dulles South at 6:45 a.m. and also serves Rosslyn and Washington, DC. For this assessment, the time between both Arlington and DC buses from Dulles South would be considered 15 minutes. However, Run 207W leaves Dulles South at 7:10 a.m., serving the District but not Arlington. As such, this run would be included in the Dulles South-DC headway calculation, but not the Dulles South-Arlington headway calculation.

Finally, for p.m. trips returning to Loudoun County, headways were measured using times between buses at H and 4th Streets (Washington, DC) and Rosslyn (Arlington).

By run type, **Table 48** summarizes published headways on various origin-destination combinations. One origin-destination combination – Loudoun Station to Washington, DC – averages a headway of 34 minutes, which exceeds the County standard of 30 minutes.

TABLE 48: AVERAGE HEADWAY ON COMMUTER BUS RUNS (PUBLISHED)

Run Type	AM / PM	Origin	Destination	Average Headway (Minutes)
Eastern Loudoun (Minority)	AM	Dulles South Stone Ridge	Arlington	28
		Dulles South Village Center	Arlington	1 Trip (N/A)
		Brambleton	Arlington	30
		Ashburn North	Arlington	17
		Loudoun Station	Arlington	1 Trip (N/A)
		Dulles North	Arlington	10

2020-2023 Title VI Program

Run Type	AM / PM	Origin	Destination	Average Headway (Minutes)
		Dulles South Stone Ridge	DC	16
		Dulles South Village Center	DC	25
		East Gate	DC	30
		Brambleton	DC	30
		Ashburn North	DC	28
		Loudoun Station	DC	34
		Dulles North	DC	9
	PM	H & 4 th Streets (DC)	Loudoun County	17
		Rosslyn (Arlington)	Loudoun County	15
Western Loudoun (Non-Minority)	AM	Purcellville	Arlington	26
		Harmony	Arlington	30
		Leesburg	Arlington	15
		Purcellville	DC	18
		Harmony	DC	25
		Leesburg	DC	10
	PM	H & 4 th Streets (DC)	Loudoun County	27
		Rosslyn (Arlington)	Loudoun County	27

Local Bus

The County's current headway standard is 60 minutes during peak periods and 70 minutes during off-peak periods, including weekends. **Table 49** shows average published headways for all Local Bus routes. As displayed, all routes meet this standard.

2020-2023 Title VI Program

TABLE 49: LOCAL BUS PUBLISHED HEADWAYS

Route Number	Minority or Non-Minority	Weekday Peak (minutes)	Weekday Off-Peak (minutes)	Saturday (minutes)	Sunday (minutes)	Meets Standard?
54	Minority	60	60	60	60	Yes
55	Non-Minority	60	60	--	--	Yes
56	Non-Minority	60	60	--	--	Yes
57	Minority	60	60	60	--	Yes
62	Minority	60	60	--	--	Yes
70	Minority	30	60	60	--	Yes
72	Minority	25	60	--	--	Yes
80	Minority	60	60	--	--	Yes
81	Non-Minority	30	30	--	--	Yes
82	Minority	45	45	60	--	Yes
84	Minority	60	70	60	--	Yes
87X	Non-Minority	45	--	--	--	Yes
88X	Minority	28	--			Yes
901	Non-Minority	30	--	--	--	Yes
902	Non-Minority	25-30	--	--	--	Yes
921	Non-Minority	45	--	--	--	Yes
922	Non-Minority	45	--	--	--	Yes
923	Minority	25	--	--	--	Yes
924	Non-Minority	30	--	--	--	Yes
925	Non-Minority	25	--	--	--	Yes
926	Non-Minority	25	--	--	--	Yes

2020-2023 Title VI Program

Route Number	Minority or Non-Minority	Weekday Peak (minutes)	Weekday Off-Peak (minutes)	Saturday (minutes)	Sunday (minutes)	Meets Standard?
927-928	Minority	30	--	--	--	Yes
931-932	Minority	30	--	--	--	Yes
985	Minority	60	70	--	--	Yes
990-992-993-994	Minority	25	--	--	--	Yes

On-Time Performance

Commuter Bus

On Commuter Bus service, on-time performance is a measure of runs that leave origin points on schedule. Commuter Bus service is reported late if a run departs an origin point more than one minute late.

Operations data from the month of May 2019 showed that 100 percent of all a.m. trips departed as scheduled, and 93 percent of all p.m. trips departed as scheduled. On average, the on-time performance rate for minority run departures was 94 percent; the on-time performance rate for non-minority runs was 96 percent. Commuter Bus on-time performance is therefore meeting the proposed system-wide standard of 85 percent.

Local Bus

The on-time range for Local Bus is between zero minutes early and five minutes late. Presently, however, Loudoun County Transit does not have a methodology or technology for consistently and accurately measuring on-time performance. Currently, DTCI does not collect data to accurately measure on-time performance. The County is in the process of acquiring GPS technology for Local Bus service that will enable future on-time performance monitoring. Equipment is being installed on the Local Bus fleet in the Fall of 2019 and the software upgrades needed to capture the Local Bus data will occur in 2020.

Service Availability

Commuter Bus

Given that access to a vehicle essentially guarantees access to a Park and Ride lot, service availability for Loudoun County Commuter Bus is a function of vehicle availability by household. According to 2013-2017 Five-Year American Community Survey estimates, approximately 98 percent of Loudoun County households have access to at least one vehicle. When analyzing between minority and non-minority Census Block Groups, this figure remains the same: 98 percent of total households in each of the two types of Block Groups have access to at least one vehicle.

2020-2023 Title VI Program

Table 50 provides a list of Park and Ride lots with Commuter Bus service, the utilization of each lot, and each lot's minority status. Given that Park and Ride users may arrive at lots by private car, carpool, transit, or on foot, and may choose to board transit or travel by another mode after arriving, utilization is expressed both as the percentage of Commuter Bus boardings divided by the number of the total spaces available, as well as the percentage of vehicles parked divided by total spaces available. Data from May 9, 2019 was utilized to calculate utilization percentages.

By either measure shown, Park and Rides served by Loudoun County Transit are most utilized in the eastern portion of the County as well as in Purcellville, where Park and Ride lots serve as the sole origin points for transit-based trips to job centers in Washington, DC and Arlington. Overall, the most utilized Park and Ride lots include Purcellville, Brambleton, Loudoun Station, and Lowes Island. The least utilized Park and Ride lots include Dulles South – Millstream Drive, Dulles Town Center, Our Lady of Hope, and Harmony. The arrival of Metrorail Silver Line service in east Loudoun County in the next two years will likely affect Park and Ride utilization rates.

Finally, minority Park and Rides average 71 percent utilization in terms of Commuter Bus boardings and 66 percent utilization in terms of vehicles parked. Non-minority Park and Rides average 79 percent utilization in terms of Commuter Bus boardings and 84 percent utilization in terms of vehicles parked.

TABLE 50: LOUDOUN COUNTY PARK-AND-RIDE LOT UTILIZATION

Park and Ride (Number of Spaces)	Commuter Bus Boardings / Spaces	Vehicles Parked / Spaces	Minority Park and Ride
Ashburn North (190)	53%	67%	Yes
Brambleton (100)	110%	98%	Yes
Broad Run Farms (48)	10%	2%	Yes
Broadlands (160)	78%	128%	Yes
Cascades (55)	65%	40%	Yes
Dulles North (750)	97%	101%	Yes
Dulles South – Millstream Dr. (250)	21%	17%	Yes
Dulles South I (100)	56%	61%	Yes
Dulles South II (300)	85%	84%	Yes
Dulles Town Center (100)	28%	36%	Yes

2020-2023 Title VI Program

Park and Ride (Number of Spaces)	Commuter Bus Boardings / Spaces	Vehicles Parked / Spaces	Minority Park and Ride
East Gate (218)	82%	77%	Yes
Goose Creek Village (83)	65%	77%	No
Harmony (250)	48%	59%	No
Leesburg (691)	78%	78%	No
Loudoun Station (300)	128%	101%	Yes
Lowes Island (65)	145%	95%	Yes
Our Lady of Hope (150)	30%	21%	Yes
Purcellville (68)	126%	121%	No

Local Bus

The Local Bus service availability standard calls for bus stop placement no less than once every 3,000 feet along routes operating through the Loudoun County Urban Policy Area. Currently, no Local Bus stops are situated within the Urban Policy Area. However, as the region develops, bus stops will likely be required in this relatively densely populated area. Thus, although monitoring is not currently warranted for this standard, the standard is preserved for this Title VI Program for future use.

Transit Amenities

Commuter Bus

Table 51 provides a list of Park and Ride lots in Loudoun County with transit amenities available. County-owned Park and Ride lots are marked with an asterisk (*).¹² In addition, several lots are served by Metro-Connection, which is classified as a Local Bus service. Despite a difference between Local and Commuter Bus transit amenities standards, lots serving Metro-Connection service should adhere to the same amenities standards as those serving Commuter Bus.

Currently, all County-owned Park and Ride lots fulfill County standards for transit amenities, including access via sidewalks or shared pathways; bicycle lockers or racks; and safe and convenient bus access provisions. Schedules, service, and fare information, as well as adequate shelters and benches, are also

¹² Loudoun County also owns the One Loudoun Park and Ride, Leesburg II Park and Ride at Loudoun United Stadium, and a future Western Loudoun Park and Ride lot that is planned to be constructed by the end of 2021. Commuter Bus service is not provided to or from these sites at this time. Therefore, they were not included in the amenities summary table.

2020-2023 Title VI Program

available at boarding locations in County-owned lots. Lots are well-lit, paved, and striped for parking. Although trash cans are not required by LCT's transit amenities standards, several lots would benefit from inclusion of this amenity.

Levels of transit amenity provision among non-County-owned lots vary. Several lots house many amenities, while others have no benches, shelters, schedules, bike facilities, or trash cans.

TABLE 51: PARK AND RIDE LOTS AND AVAILABLE TRANSIT AMENITIES

Park and Ride	Available Amenities					
	<i>Benches/ Seating</i>	<i>Shelters/ Canopies</i>	<i>Schedules</i>	<i>Bike Racks</i>	<i>Bike Lockers</i>	<i>Trash Cans</i>
Ashburn North*	x	x	x	x		
Brambleton	x	x	x	x		x
Broad Run Farms						
Broadlands						
Cascades	x	x	x			x
Dulles North	x	x	x		x	x
Dulles South – Millstream Dr.	x	x	x	x		x
Dulles South I*				x		
Dulles South II*	x	x	x		x	x
Dulles Town Center*	x	x	x	x	x	
East Gate*	x	x	x	x	x	

2020-2023 Title VI Program

Park and Ride	Available Amenities					
	<i>Benches/ Seating</i>	<i>Shelters/ Canopies</i>	<i>Schedules</i>	<i>Bike Racks</i>	<i>Bike Lockers</i>	<i>Trash Cans</i>
Goose Creek Village	x	x	x	x		
Harmony*	x	x	x	x	x	
Leesburg*	x	x	x		x	x
Loudoun Station	x	x		x		x
Lowes Island						
Our Lady of Hope			x			x
Purcellville	x	x	x	x	x	x

Local Bus

Loudoun County Local Bus stops should have clearly-marked signs when located in the public right of way. Where stops are located on private property, signs are to be placed when permitted. Currently, signs are installed at all Local Bus stops that are in the public right-of-way.

In addition, a new policy proposed in this document calls for a determination on the appropriateness of installing a bus shelter at new stops that are anticipated to meet or exceed 20 passenger boardings daily or that serve a high trip generation land use. Factors to consider in determining the appropriateness of installing a bus shelter may include physical site conditions, right-of-way limitations, anticipated longevity of the stop placement, nearby amenities, and other such issues. Currently, many Local Bus stops have shelters, some of which are County or Town-owned, and some of which are maintained by private enterprises. As soon as stop-level farebox data is available and the analytical software is configured, the County should aim to track daily boardings by stop to warrant and plan for new shelters, as well as develop an inventory of shelters by route rather than by jurisdiction alone.

Vehicle Assignment

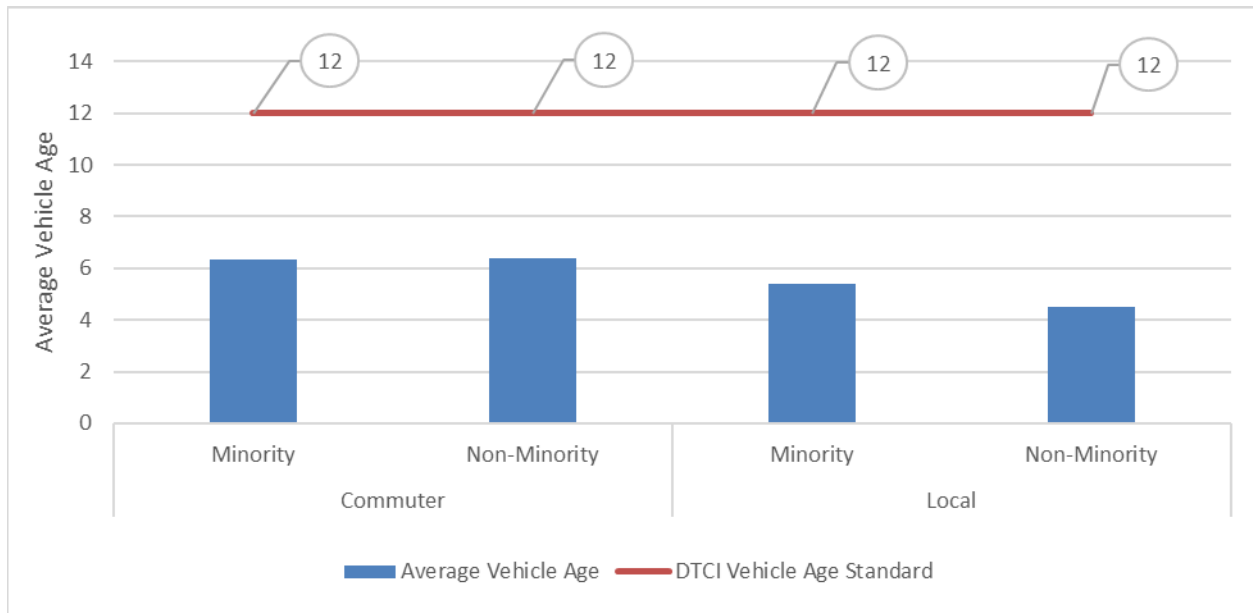
Commuter Bus and Local Bus

Loudoun County Transit does not assign vehicles to routes based on an age standard. The County's policy is that Commuter and Local Bus vehicles should not exceed 12 years of age. The chassis of a body-on-chassis bus should be replaced every five years. The average age of vehicles currently operating on both minority and non-minority Commuter Bus routes is six years, while the average age of

2020-2023 Title VI Program

vehicles currently operating on minority and non-minority Local Bus routes is five years. However, the age of chassis mechanisms was not provided for this assessment and should be evaluated by the County regularly.

FIGURE 7: AVERAGE BUS AGE ON MINORITY VS. NON-MINORITY COMMUTER BUS RUNS



Monitoring Findings

The majority of Loudoun County's transit service standards and policies are met in Commuter and Local Bus service:

- Vehicle load factors on Commuter and Local Bus service do not exceed the County's load standard of 1.25.
- The vast majority of published Commuter Bus headways, and all Local Bus published headways meet County standards.
- Commuter Bus on-time performance meets the proposed County standard of 85 percent.
- As access to a vehicle essentially guarantees access to Commuter Bus service in Loudoun County, approximately 98 percent of County residents have access to Commuter Bus service.
- The Local Bus service availability standard defines stop spacing guidelines for the County's Urban Policy Area. However, there are currently no bus stops in this area. As the Urban Policy Area develops, this standard should be used when considering future bus route and stop placement.
- While County-owned Park and Ride lots meet transit amenities standards, the Ashburn North, Dulles South, East Gate, and Harmony lots would benefit from having trash cans installed. In addition, the County should encourage transit amenity provision at non-County lots that lack amenities.
- Both Commuter and Local Bus vehicles meet vehicle age standards set by the County.

2020-2023 Title VI Program

In addition, three issues were identified:

- The County does not currently track on-time performance for local bus. In the future, Loudoun County plans to utilize tracking through a GPS system on local buses to monitor on-time performance.
- The published vehicle headway for Commuter Bus trips from Loudoun Station to Washington, DC is 34 minutes, which exceeds the County standard of 30 minutes. However, given that Commuter Bus service follows a run rather than fixed-route schedule, Commuter Bus vehicle headways are relatively less important than for Local Bus service.
- To plan for placement of new bus shelters as well as accurately assess current ones, Loudoun County should track Local Bus daily boardings by stop and develop an inventory of shelters by route rather than by jurisdiction alone.

Evaluating Service and Fare Changes

As part of the development of this Title VI Program, the Department of Transportation and Capital Infrastructure updated its policies with regard to major service changes, disparate impacts, and disproportionate burdens for Loudoun County Transit. These policies were reviewed by the public through an outreach effort that included a stakeholder meeting with representatives from community-based organizations, presentation to the Transit Advisory Board, and an opportunity to comment on proposed policies listed on the Loudoun County website. Ultimately, the policies will be finalized and approved by the Loudoun County Board of Supervisors in conjunction with this program update.

Major Service Change Policy

Adjustments to Major Service Change Policy

DTCI's major service change was modified slightly from the previous Title VI Program. Notable changes included:

- The new policy qualifies a major service change as one adding or eliminating 20 percent or more of a route's revenue miles or hours. The previous policy employed a 25 percent revenue miles or hours threshold.
- The new policy qualifies a major service change as any modification on an individual bus route that would add or eliminate 15 percent or more of the route's average daily ridership. The previous policy did not employ ridership a criterion.

Major Service Change Policy

Major service changes are changes that necessitate completion of a Title VI Service Equity Analysis. A Service Equity Analysis assists in determining whether a major service change could cause a disparate impact or disproportionate burden (these terms are described in the next section). The new major service change policy defines a major service change as:

- Any change that adds or eliminates a bus route.
- Any change in service on any individual bus route that would add or eliminate 20 percent or more of the route's weekly revenue miles (the number of mile a bus operates while carrying paying passengers).
- Any change in service on any individual bus route that would add or eliminate 20 percent or more of the route's weekly revenue hours (the number of hours a bus operates while carrying paying passengers).
- Any change in service on any individual bus route that would add or eliminate 15 percent or more of the average daily ridership.

Per FTA C 4702.1B, any increase or decrease fares on the entire system, or on certain transit modes, or by fare payment type or fare media requires a fare equity analysis.

Exemptions

Per FTA C 4702.1B, the major service change thresholds exclude any changes to service that are caused by the following:

2020-2023 Title VI Program

- Initiation of temporary services that will be in effect for less than one year.
- Discontinuance of temporary or demonstration services that were in effect for eighteen months or less.
- Natural or catastrophic disasters that may force the suspension of transit service for public safety or technical events.
- Temporary route detours, meaning any short-term change to a route caused by road construction, routine road maintenance, road closures, emergency road conditions, fiscal crisis, civil demonstrations or any uncontrollable circumstance.

Disparate Impact and Disproportionate Burden Policies

DTCI's policies for disparate impact and disproportionate burden adhere to FTA standards. Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, without substantial legitimate justification and where one or more alternatives serving the same objectives with less impact exists. DTCI's measure for Disparate Impact is:

A disparate impact occurs when the difference between the percentage of minority populations in the service area affected by a proposed fare or service change is five percent or greater than the average percentage of minority populations across the system-wide service area. Impacts will be reviewed on a cumulative basis

A disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires alternatives to be evaluated and burdens mitigated where practicable. DTCI's measure for Disproportionate Burden is:

A disproportionate burden occurs when the difference between the percentage of low-income households in the service area affected by a proposed fare or service change is five percent or greater than the average percentage of low-income households across the system-wide service area. Impact will be reviewed on a cumulative basis.

Previously, the thresholds for both the disparate impact and disproportionate burden policies were 15 percent. For each policy, the five percent is added to the average system-wide minority or low-income population for determining adverse impacts for service reductions and is subtracted from the average system-wide minority or low-income population for determining adverse impacts for service additions.

Loudoun County uses the most recent five-year U.S. Census Bureau American Community Survey data to conduct service equity analyses. For a disparate impact analysis, the primary ACS table utilized is Table B03002, "Hispanic or Latino Origin by Race." This table identifies all minority and non-minority populations within a block group, including Hispanic or Latino. The percentage of minority residents for the service area is equivalent to that of Loudoun County as a whole. For a disproportionate burden analysis, the primary ACS table used is Table B19001, "Household Income in the Past 12 Months." The

2020-2023 Title VI Program

percentage of low-income households in Loudoun County is utilized as the service area low-income household percentage.

Service Equity and Fare Equity Analyses

In compliance with Federal Transit Administration (FTA) requirements necessitating inclusion of service and fare equity analyses, the following document has been completed separately: *Title VI Service Equity Analysis, Fiscal Year 2020 Service Changes for Implementation Fall 2019*. This document will be included as **Appendix B** if necessary for submission to FTA.

Appendix A: Language Access Plan Maps (Concentrations of Linguistically Isolated Safe Harbor Language Speakers)

FIGURE 8: LINGUISTICALLY ISOLATED ARABIC SPEAKERS AS A PERCENTAGE OF TOTAL POPULATION BY CENSUS TRACT

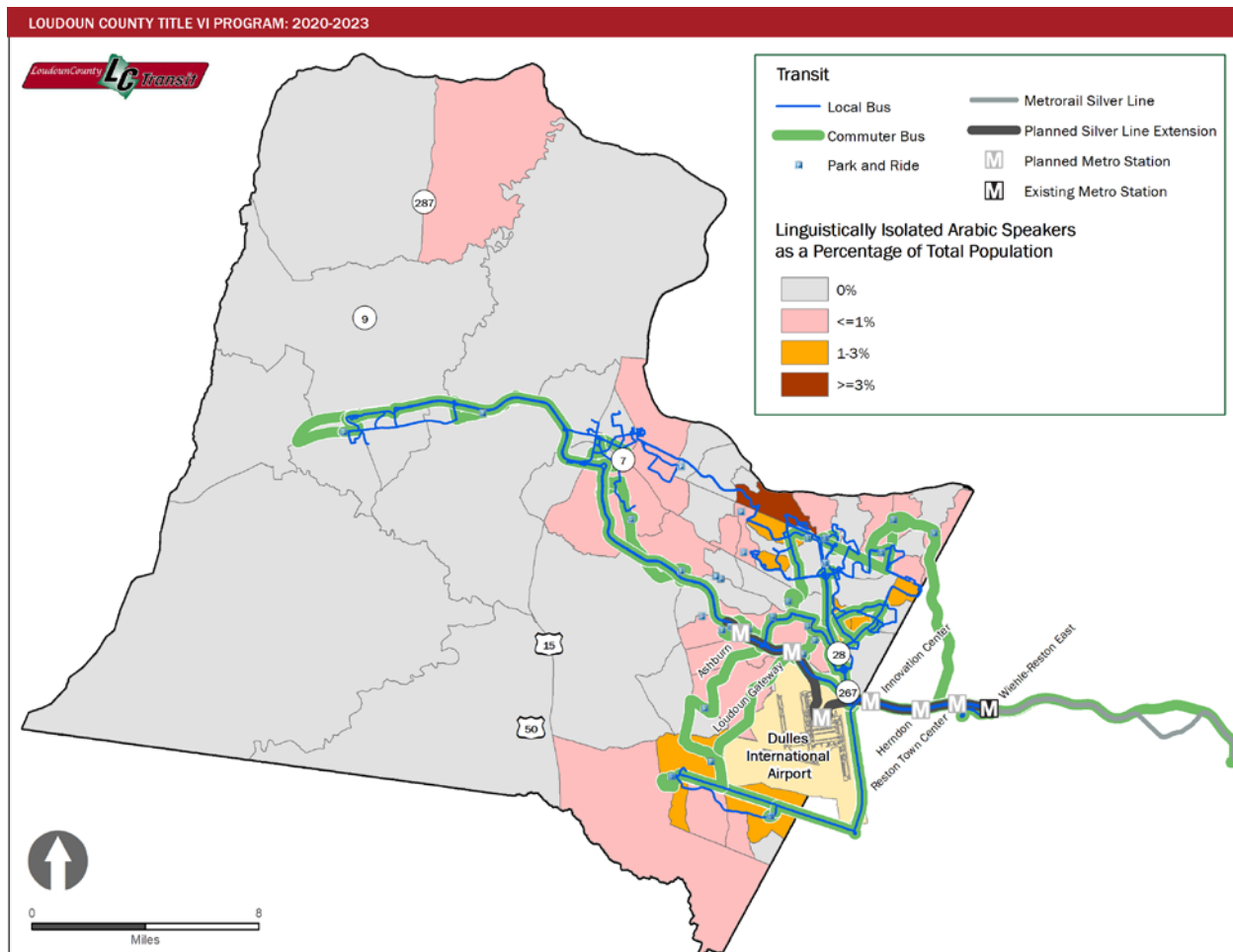


FIGURE 9: LINGUISTICALLY ISOLATED CHINESE SPEAKERS AS A PERCENTAGE OF TOTAL POPULATION BY CENSUS TRACT

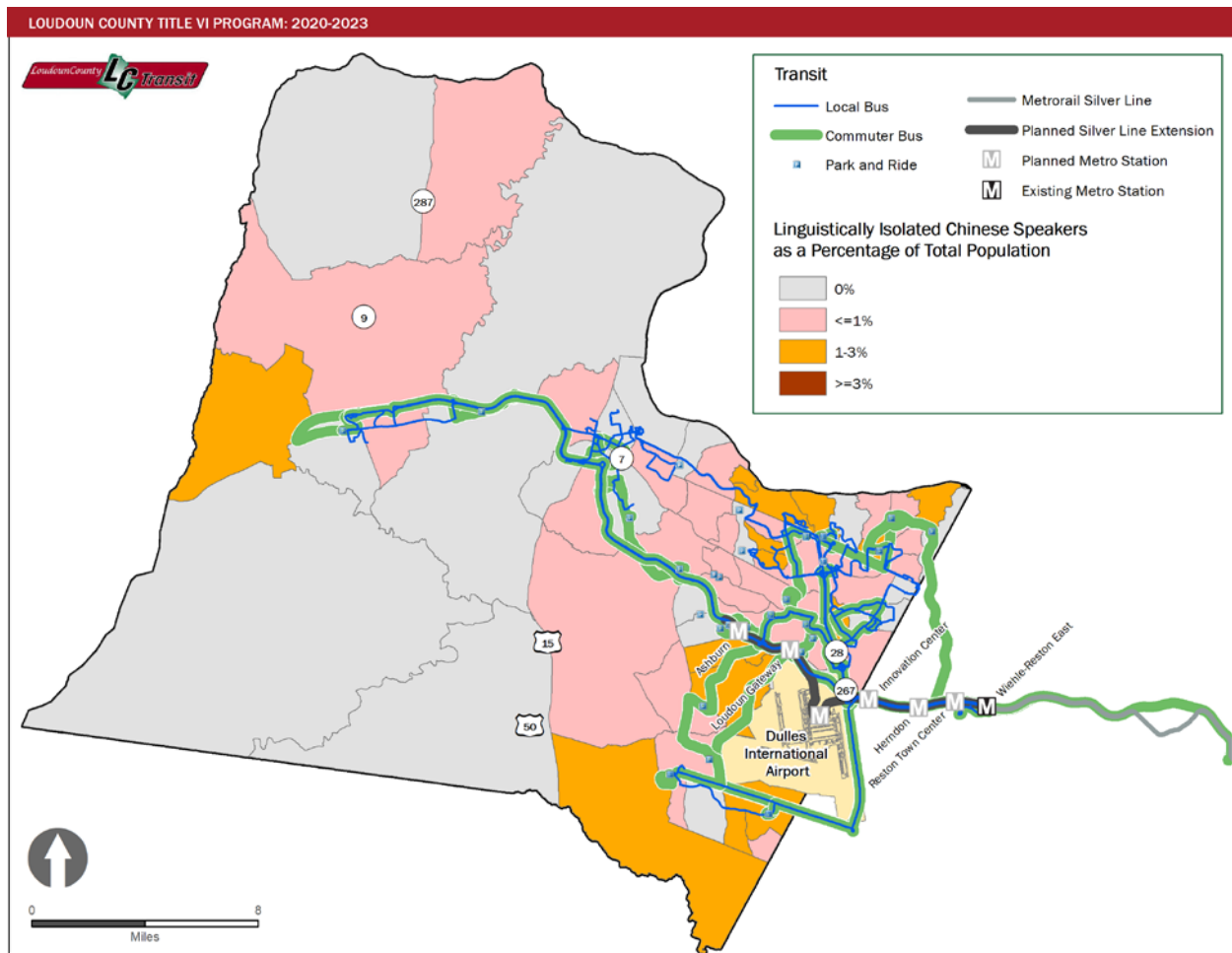


FIGURE 10: LINGUISTICALLY ISOLATED FRENCH (INCLUDING HAITIAN/CAJUN) SPEAKERS AS A PERCENTAGE OF TOTAL POPULATION BY CENSUS TRACT

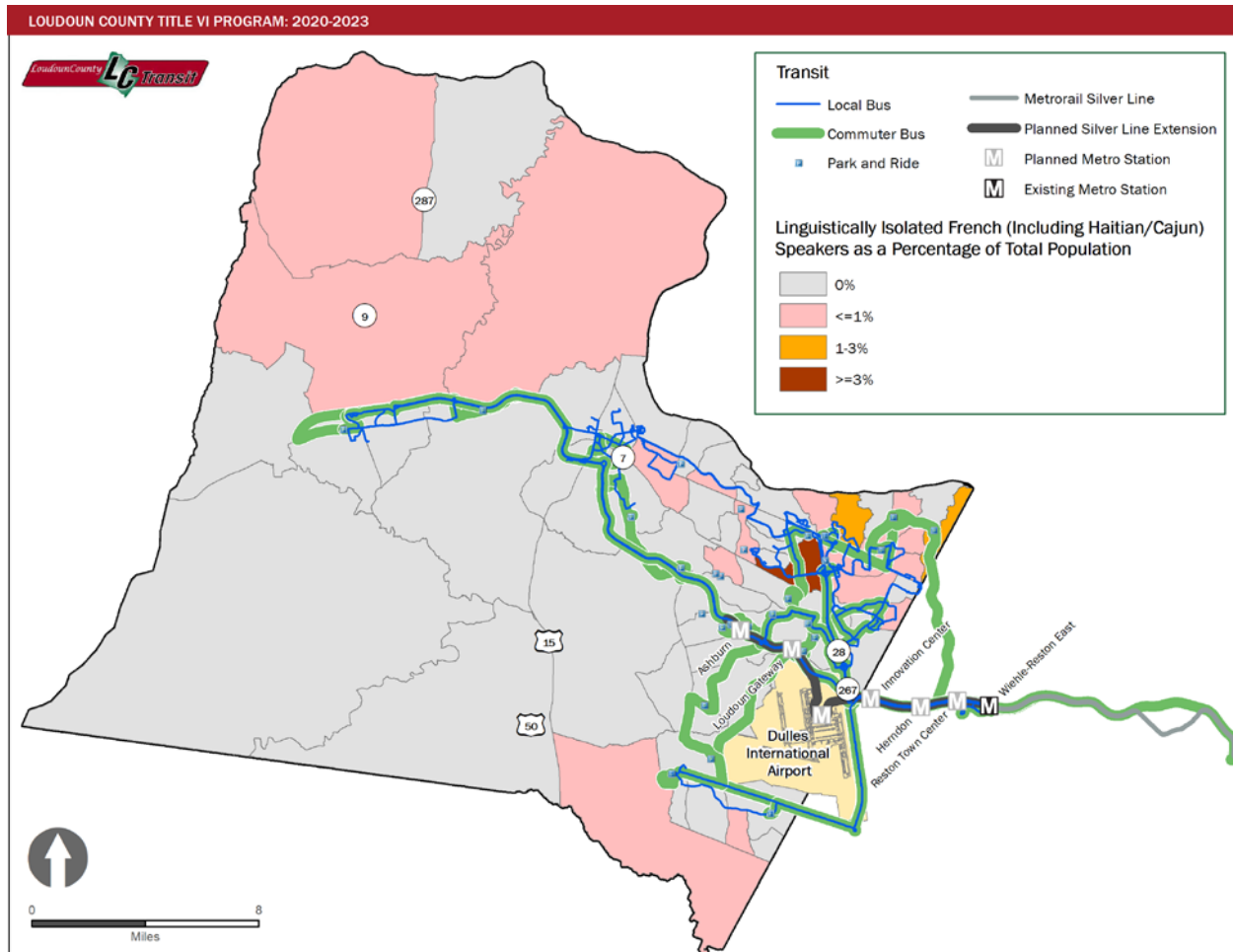


FIGURE 11: LINGUISTICALLY ISOLATED OTHER INDO-EUROPEAN LANGUAGE SPEAKERS AS A PERCENTAGE OF TOTAL POPULATION BY CENSUS TRACT

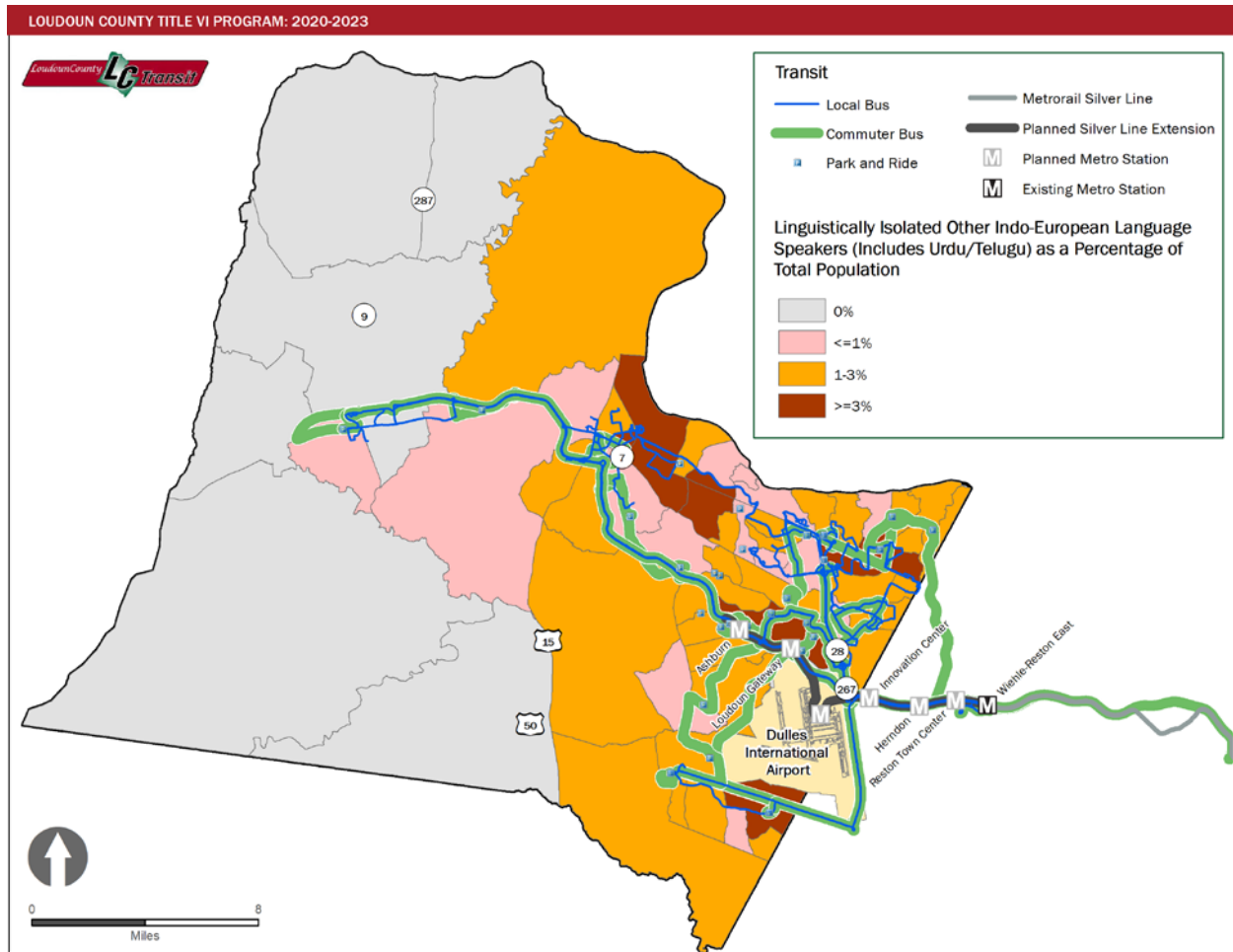


FIGURE 12: LINGUISTICALLY ISOLATED KOREAN SPEAKERS AS A PERCENTAGE OF TOTAL POPULATION BY CENSUS TRACT

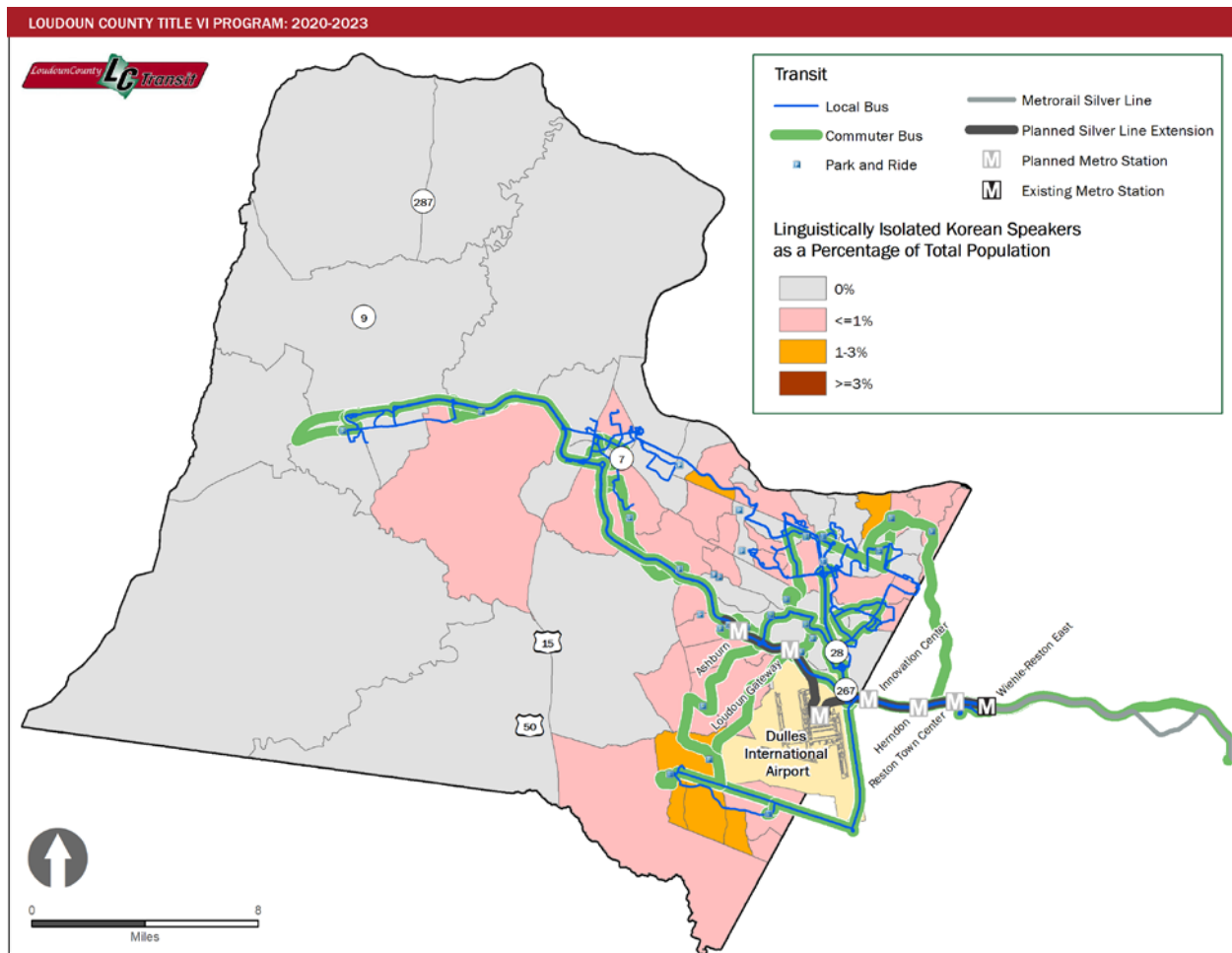


FIGURE 13: LINGUISTICALLY ISOLATED RUSSIAN/POLISH/SLAVIC SPEAKERS AS A PERCENTAGE OF TOTAL POPULATION BY CENSUS TRACT

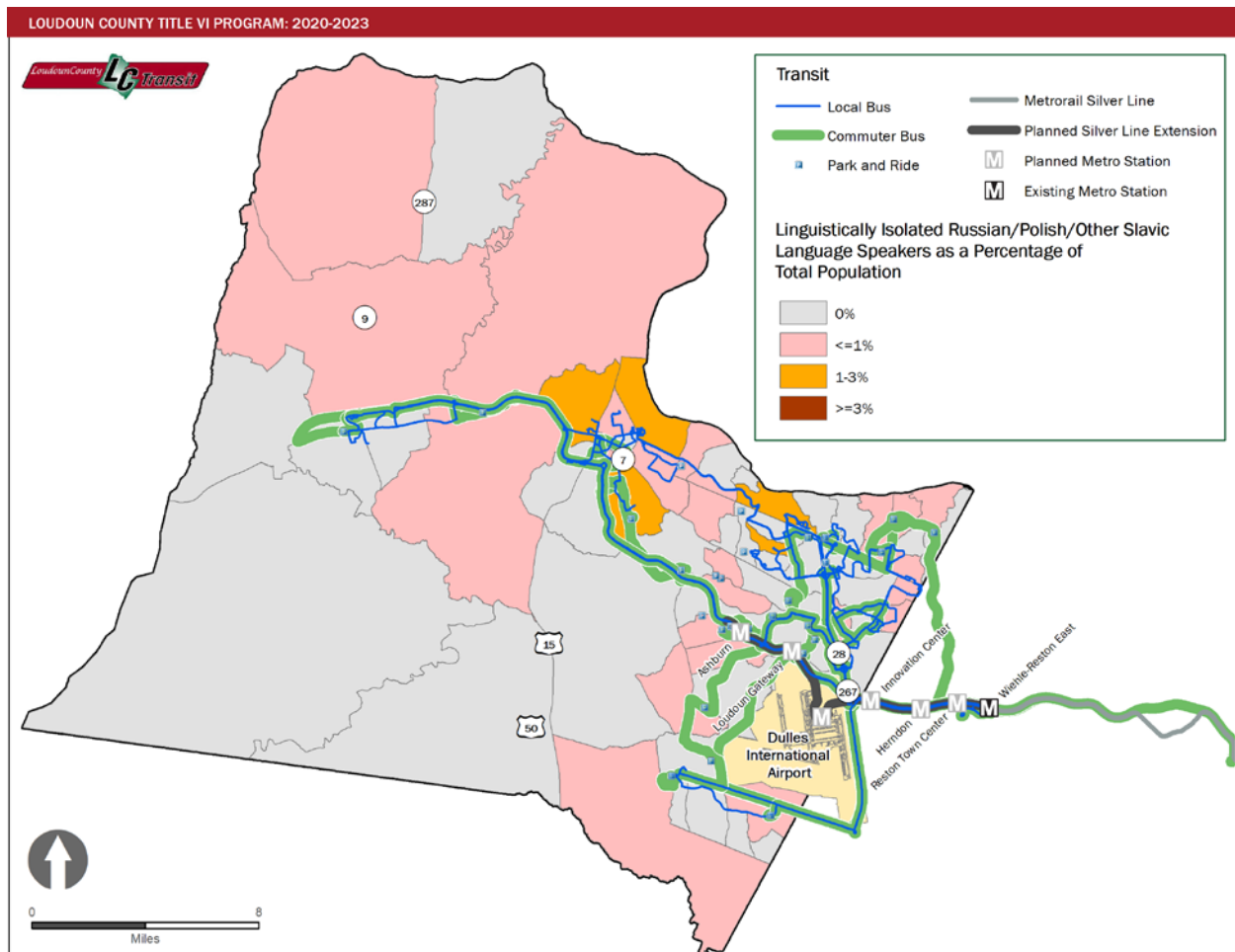


FIGURE 14: LINGUISTICALLY ISOLATED SPANISH SPEAKERS AS A PERCENTAGE OF TOTAL POPULATION BY CENSUS TRACT

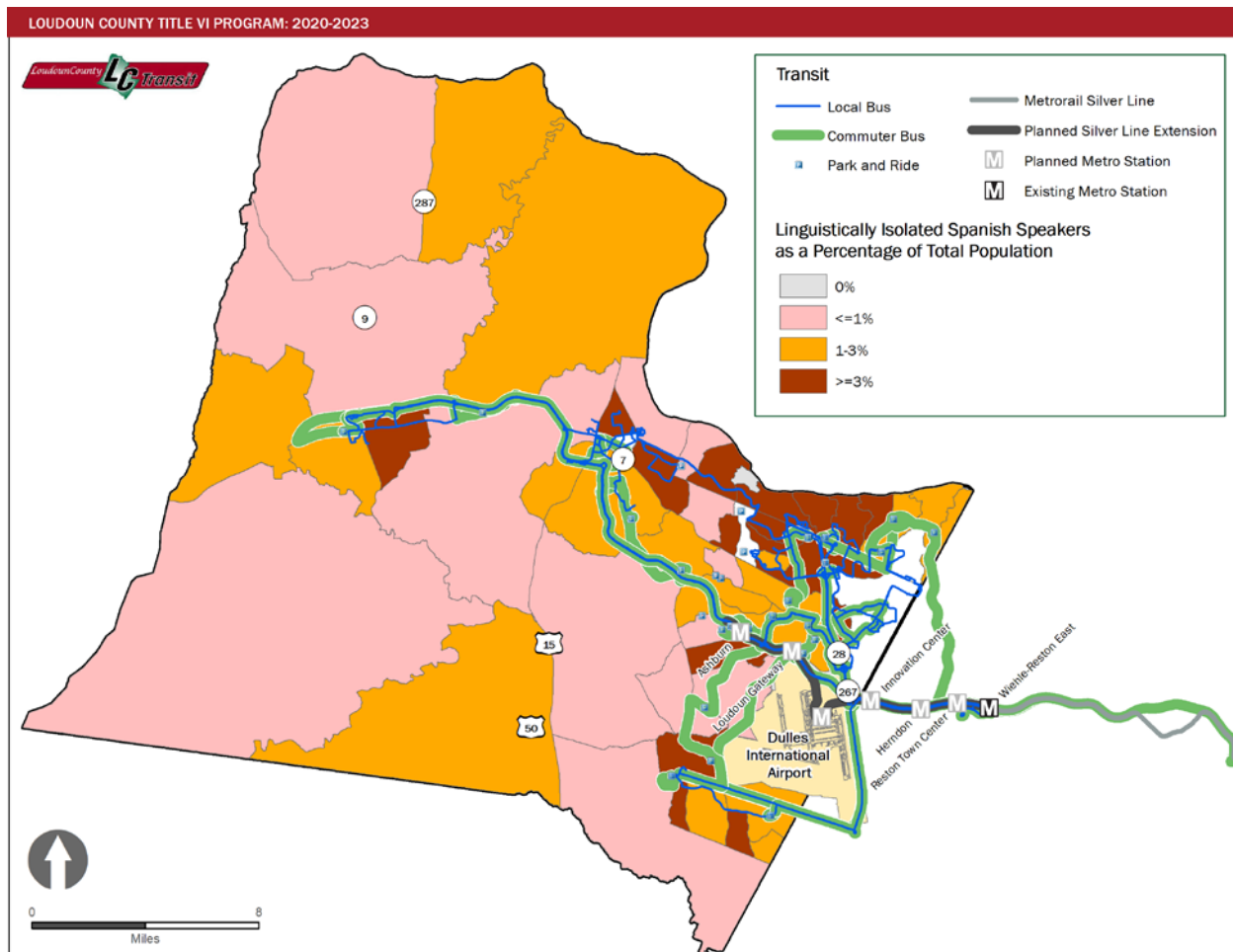
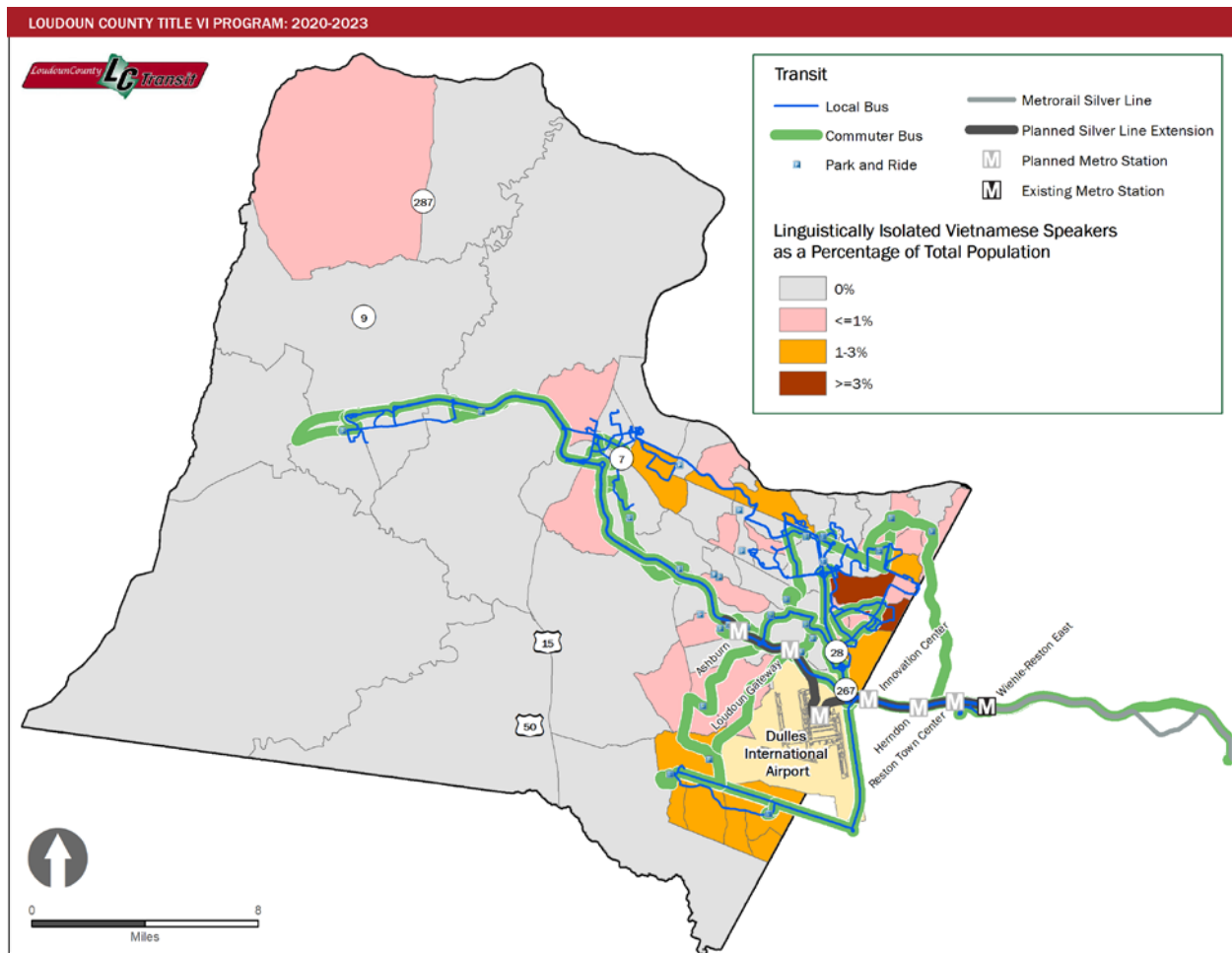


FIGURE 15: LINGUISTICALLY ISOLATED VIETNAMESE SPEAKERS AS A PERCENTAGE OF TOTAL POPULATION BY CENSUS TRACT



Appendix B: Equity Analyses for Service and Fare Changes (Approved separately; this appendix added for package submission to FTA if required.)