

# Memorandum

**DATE:** January 26, 2026  
**TO:** ATG|DCCM  
**FROM:** Hollaway Environmental + Communications, Inc.  
**RE:** Victoria Transit Metropolitan Planning  
Organization Title VI Compliance Evaluation

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## Introduction to the Victoria Transit Title VI Compliance Review

Victoria Transit, operated by the Golden Crescent Regional Planning Commission (GCRPC), affirms its full compliance with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin in any program or activity receiving federal financial assistance. This commitment is fully integrated into the agency's Public Participation Plan (PPP) and all related transit planning, service delivery, and capital investment decisions.

Victoria Transit ensures that public participation opportunities are accessible, inclusive, and equitable, with specific attention given to minority populations, low-income individuals, persons with disabilities, and individuals with Limited English Proficiency (LEP). Participation opportunities are open to all community members and are designed to remove linguistic, cultural, economic, institutional, and physical barriers that may otherwise limit access to decision-making processes.

In accordance with Executive Order 13166 and U.S. Department of Transportation (DOT) LEP Guidance, GCRPC maintains a LEP Plan and applies the federally required Four Factor Analysis to determine appropriate language assistance measures. Translation and interpretation services are provided when needed, including bilingual public notices, oral interpretation, and alternative non-written comment options. The agency also follows the Department of Justice (DOJ) Safe Harbor Provision for translation of vital documents to ensure meaningful access for LEP populations.

Key demographic data for the Victoria Transit service area, including minority (69.1%), low-income (20.7%), and LEP (6.9%) populations, is utilized to guide targeted outreach strategies and ensure compliance with nondiscrimination requirements. Partnerships with community-based organizations, educational institutions, housing authorities, and social service providers further strengthen Victoria Transit's ability to reach historically underserved populations.

Title VI compliance is formally embedded in:

- Major service changes
  - Fare modifications
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- Capital investment and improvement projects
- Long-range and short-range planning activities

For such actions, Victoria Transit implements structured public notification and engagement procedures, including 21-day public comment periods, multilingual notices, American Disability Association (ADA)-accessible formats, advance meeting notifications, and multiple avenues for public input.

A formal Title VI complaint process is maintained through GCRPC, allowing any individual who believes they have been subjected to discrimination to file a complaint with the agency's Title VI Program Director. Public input and demographic outreach outcomes are documented and evaluated following major outreach efforts to ensure that engagement remains effective and equitable over time.

Through these policies and procedures, Victoria Transit and the Victoria Metropolitan Planning Organization (MPO) demonstrate an ongoing, enforceable commitment to civil rights protection, environmental justice, and equitable access to transportation services, consistent with all applicable federal Title VI and DOT regulatory requirements.

This document serves as a detailed evaluation of the compliance achieved.

## *History and Explanation of Title VI*

Title VI (Title VI of the Civil Rights Act of 1964) is a U.S. federal civil rights law that prohibits discrimination based on race, color, or national origin in any program or activity that receives federal financial assistance.

Title VI states that:

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

This applies to:

- State and local governments
- School districts and universities
- Transit agencies
- Hospitals and health agencies
- Planning organizations, MPOs, TxDOT, ports, utilities, etc.
- Nonprofits receiving federal grants

Under national origin, Title VI requires meaningful access for:

- Limited English Proficiency (LEP) individuals

This means agencies such as Victoria Transit must provide:

- Translated documents
- Interpreters at public meetings
- Multilingual outreach
- Language access plans

In transportation, flood mitigation, and infrastructure planning, Title VI affects:

- Project siting and alignment
- Public involvement processes
- Environmental justice analysis
- Funding allocation
- Transit access and fare policies
- Disaster recovery equity

Agencies such as Victoria Transit must have:

- A Title VI Plan
- A Title VI coordinator
- A formal complaint process
- Proof of nondiscriminatory public outreach

## **Title VI Compliance Evaluation of Victoria Transit Plan Review**

The Victoria Transit Plan Review memorandum documents a comprehensive plan review conducted by Alliance Transportation Group (ATG) on behalf of the Victoria MPO, on August 11, 2025, to support development of the Victoria Transit Plan. The review examined a wide range of local, regional, and agency planning documents, including MPO, City of Victoria, and GCRPC plans, to establish a consistent understanding of existing conditions, future transit needs, and alignment with ongoing planning efforts affecting Victoria Transit operations and investments

Across all reviewed plans, common themes emerged emphasizing the need for targeted transit investment, improved service in high-demand areas, and stronger integration of transit with multimodal networks, land use, and economic development goals. Many plans support vehicle replacements, enhanced bus stop amenities, improved fare collection, and expanded service coverage, while also recognizing significant fiscal constraints related to material costs and limited funding. As a result, the review highlights the importance of phased, cost-conscious implementation strategies combined with lower-cost programmatic improvements

Key MPO and City plans, such as the Move Victoria 2050 MTP, Transportation Improvement Program, Active Transportation Master Plan, Downtown Master Plan, and Parks and Recreation Master Plan, reinforce the role of transit in improving accessibility, supporting complete streets, connecting to major destinations, and serving underserved populations. Regional GCRPC plans further emphasize fixed-route optimization, coordinated regional service delivery, cost efficiency, and public awareness, while providing practical cost benchmarks for bus stop infrastructure.

The review also underscores the importance of equity and federal compliance, drawing on the GCRPC Limited English Proficiency Plan and the Community Development Block Grant Analysis of Impediments to address service gaps and accessibility barriers for low-income, minority, and LEP populations. Overall, the memorandum concludes that Victoria Transit's future strategy should be coordinated, fiscally responsible, equitable, and fully integrated with regional planning, multimodal transportation systems, and community development priorities.

### *Planning Documents Reviewed*

To support development of the Victoria Transit system redesign and ensure continuity with the MPO's transportation planning process, the project team reviewed a range of adopted regional and local planning documents, including:

- The Golden Crescent – Directions for the Future Plan
- GCRPC's 5-Year Regionally Coordinated Transportation Plan (RCTP)
- The Move Victoria 2050 Metropolitan Transportation Plan (MTP)
- The Victoria MPO's 2025–2028 Transportation Improvement Program (TIP)
- The City of Victoria's Active Transportation Master Plan (ATMP)
- The Victoria Thoroughfare Master Plan
- The City of Victoria's 2035 Comprehensive Plan
- The Community Development Block Grant (CDBG) Analysis of Impediments
- The City of Victoria's Downtown Master Plan
- The City of Victoria's Parks and Recreation Master Plan
- The City of Victoria's Community Center and Fairgrounds Master Plan
- The City of Victoria's Library Master Plan

These documents were reviewed to identify transit-related goals, service priorities, equity considerations, land use patterns, multimodal connectivity needs, and funding constraints relevant to the Victoria Transit system redesign.

## *Plan Review Methodology*

The project team conducted a qualitative review of adopted MPO, City, and regional planning documents to identify themes, gaps, overlaps, and consistencies related to transit service, accessibility, equity, and implementation feasibility. The review focused on:

- Transit access and service coverage priorities
- Connections to major employment, medical, educational, and civic destinations
- Multimodal connectivity and first/last-mile access
- Equity and accessibility considerations
- Funding constraints and phased implementation strategies

Findings from this review were synthesized to inform the development of fixed-route service concepts, stop placement considerations, public engagement strategies, and equity-focused service planning for Victoria Transit.

## *Continuity with the MPO Transportation Planning Process*

The Victoria MPO's continuing, cooperative, and comprehensive (3-C) transportation planning process provides the policy and funding framework for regional mobility improvements, including public transportation. The Move Victoria 2050 Metropolitan Transportation Plan (MTP) establishes long-range multimodal goals and priorities for the region, while the 2025–2028 Transportation Improvement Program (TIP) identifies fiscally constrained near-term projects eligible for federal and state funding.

The plan review process ensures that the Victoria Transit system redesign aligns with the MPO's adopted planning framework by incorporating relevant goals, strategies, and community priorities documented in the MTP, TIP, and related City and regional plans. This approach supports continuity between long-range transportation policy, near-term implementation, and fixed-route transit service development.

At the time of the MTP's adoption, a transit routing study was underway and had not yet completed public involvement or finalized recommendations. The current Victoria Transit system redesign therefore represents a continuation of the MPO's planning process by translating MTP goals into operational transit service concepts informed by updated data, stakeholder input, and community engagement.

## *Federal Transit Administration Planning Compliance*

- Supports development of the Victoria Transit Plan using a comprehensive review of adopted MPO, local, and regional transportation plans, consistent with federal planning requirements.
- Ensures transit planning is aligned with the Move Victoria 2050 Metropolitan Transportation Plan (MTP) and the fiscally constrained 2025–2028 Transportation Improvement Program (TIP).

- Identifies transit-related projects eligible for federal funding, including vehicle replacements, preventive maintenance, operational assistance, and stop infrastructure improvements.
- Reinforces coordination between Victoria MPO, City of Victoria, TxDOT, and GCRPC to support a continuing, cooperative, and comprehensive (3C) planning process.

## *Key Consistencies Across Planning Documents*

The review of regional and local plans identified several consistent themes that support and guide the Victoria Transit system redesign:

- **Multimodal Connectivity:** Multiple plans emphasize the importance of integrating transit with pedestrian, bicycle, and roadway networks. The Active Transportation Master Plan (ATMP) and Thoroughfare Master Plan highlight the need for safe, accessible first- and last-mile connections to transit stops, including sidewalks, crossings, lighting, and ADA-compliant infrastructure.
- **Access to Key Destinations:** The MTP, Downtown Master Plan, Parks and Recreation Master Plan, and Community Center/Fairgrounds Master Plan consistently identify major employment centers, medical facilities, educational institutions, parks, and civic destinations as priority areas for transportation access.
- **Equity and Accessibility:** The CDBG Analysis of Impediments, GCRPC's Limited English Proficiency (LEP) Plan, and Title VI requirements emphasize the need to ensure transportation services are accessible to minority, low-income, elderly, disabled, and LEP populations.
- **Fiscal Constraints and Phased Implementation:** Plans consistently acknowledge funding limitations and rising infrastructure costs, emphasizing cost-effective improvements, phased implementation, and coordination with existing capital programs.

## *Identified Gaps and Service Deficiencies*

The plan review identified several gaps and service deficiencies relevant to the current fixed-route transit system:

- **Transit Walkshed Gaps:** Parts of the west-central and northeast areas of Victoria include higher-density residential and employment areas that fall outside a typical ¼-mile walkshed of existing bus stops, limiting convenient access to transit service.
- **Underserved Employment Areas:** At least one employment-dense area west of downtown lacks direct transit service, creating access challenges for workers who rely on public transportation.
- **First- and Last-Mile Barriers:** Gaps in pedestrian infrastructure, such as missing sidewalks, limited crossings, and lack of ADA-compliant access near some stops, reduce the usability of transit service even where routes exist.

- Equity-Related Access Barriers: Low-income, minority, elderly, disabled, and LEP populations continue to face challenges in accessing transportation information and services, affecting awareness of service changes and participation in planning processes.
- Stop Amenities and Comfort: Many existing stops lack shelters, seating, lighting, and wayfinding features, resulting in inconsistent rider comfort and accessibility across the system.

## **Overlaps and Opportunities to Leverage**

The review also identified overlaps among plans that create opportunities to support transit improvements:

- ATMP and Thoroughfare Improvements: Planned pedestrian and bicycle infrastructure projects can be coordinated with transit stop locations to improve access, safety, and comfort.
- Downtown and Civic Facility Investments: Downtown revitalization, park improvements, and community facility upgrades can enhance transit visibility and ridership.
- TIP Programming and Grant Opportunities: The TIP provides a mechanism for funding transit-related capital improvements such as vehicle replacements, preventive maintenance, and bus stop infrastructure.
- Community Partnerships: Community-based organizations and social service providers can support outreach to diverse populations and gather feedback on service needs.

## **Title VI of the Civil Rights Act**

- Incorporates findings from the Community Development Block Grant Analysis of Impediments, identifying transit service gaps affecting low-income and underserved populations.
- Recognizes equity considerations in route timing, stop placement, amenities, and service coverage as recurring concerns in community feedback across multiple plans.
- Supports equitable investment by prioritizing higher population and employment density areas while acknowledging the needs of historically underserved communities.
- Reinforces the need for service impartiality and equity analysis as part of future transit planning and implementation decisions.

## **Limited English Proficiency (LEP)**

- Relies on the GCRPC Limited English Proficiency (LEP) Plan (2022) to ensure meaningful access to transit information and planning activities for LEP populations.
- Confirms availability of translated materials, oral language assistance, staff training, and multilingual outreach, consistent with Executive Order 13166 and DOT LEP Guidance.

- Acknowledges LEP requirements across fixed-route, paratransit, commuter, and Section 5310 services operated or administered by GCRPC.

## *Multimodal & Accessibility Compliance*

- Integrates transit planning with Active Transportation Master Plan recommendations to improve first-mile/last-mile pedestrian and bicycle access within ¼ mile of transit routes.
- Supports complete streets principles from the Thoroughfare Master Plan to enhance safety, accessibility, and multimodal mobility along transit corridors.
- Encourages improved access to community destinations—including parks, downtown, libraries, and community centers—through coordinated transit and pedestrian infrastructure investments.

## *Implications for the Fixed-Route Transit System Redesign*

Findings from the plan review directly influence the current Victoria Transit system redesign in the following ways:

- **Route Alignment and Coverage:** Routes should prioritize higher population and employment density areas while addressing identified walkshed gaps and underserved employment centers.
- **Stop Placement and Spacing:** Stop locations should be adjusted to improve access in areas outside the ¼-mile walkshed, with consideration for pedestrian infrastructure quality and ADA accessibility.
- **First- and Last-Mile Coordination:** Transit planning should be coordinated with ATMP and Thoroughfare Master Plan improvements to enhance safety and accessibility near high-ridership stops.
- **Equity and Title VI Compliance:** Proposed service changes should be evaluated for potential disproportionate impacts on minority and low-income populations, with multilingual outreach and ADA-accessible materials integrated into the planning process.
- **Phased Amenity Improvements:** Given fiscal constraints, a phased approach to bus stop improvements is recommended, beginning with low-cost signage and followed by targeted shelter and ADA upgrades at priority locations.

## *Fiscal Constraint & Implementation Accountability*

- Acknowledges fiscal constraints related to rising material and infrastructure costs, requiring phased and cost-conscious implementation strategies.
- Uses local historical unit cost benchmarks for bus stop and shelter improvements to support realistic capital planning and grant justification.
- Reinforces the need for coordinated fiscally responsible transit strategies aligned with available funding and regional priorities.

## The Public Participation Plan

The Victoria Transit Public Participation Plan (PPP) establishes a comprehensive framework for engaging the public in transit planning, service changes, and investment decisions. Operated by the GCRPC in partnership with the City of Victoria, the plan aligns with Federal Transit Administration (FTA) requirements and emphasizes early, continuous, and inclusive public involvement. It is designed to ensure that community input, particularly from historically underserved populations, is actively integrated into decision-making.

The PPP's core goals are awareness and outreach, broad participation, responsiveness to public input, and consistency across all transit activities. The plan prioritizes engagement with minority populations, low-income residents, people with disabilities, and individuals with LEP, in compliance with Title VI of the Civil Rights Act, Executive Order 13166, and DOT LEP guidance. Language access is supported through translation services, a Four-Factor Analysis, and adherence to the Safe Harbor Provision for written materials.

Public participation is required for major service changes, fare adjustments, planning activities, and capital investment projects. Major service changes are defined by thresholds such as route additions or eliminations or impacts affecting 25% or more of riders, route miles, or vehicle miles. For these actions, Victoria Transit must implement tailored outreach strategies that identify affected populations, reduce participation barriers, and document and respond to public feedback.

The plan outlines a robust outreach toolkit, including public notices in English and Spanish, accessible formats under the ADA, public comment periods of at least 21 days, public meetings and hearings, community events, partnerships with local organizations, and ongoing feedback channels such as websites, email, phone, and board meetings. Effectiveness is measured through post-outreach summary reports and, when feasible, demographic analysis to ensure priority populations are reached.

Overall, the PPP serves as a living document that reinforces Victoria Transit's commitment to transparency, equity, regulatory compliance, and community trust, ensuring public input meaningfully shapes transit services and long-term transportation outcomes in the Victoria service area.

The PPP ensures the following key compliance requirements are met:

- **Federal Transit Administration (FTA)**
  - Complies with 49 U.S.C. §5307 public participation requirements for programs of projects, fare changes, and major service reductions. Ensures early and continuous public involvement, reasonable access to information, open public meetings, and access to decision-making processes. Requires proactive public participation for:

- Fare, fare media, or fare policy changes
- Major service changes (route additions/removals or  $\geq 25\%$  impact to riders, route miles, or vehicle miles)
- Major capital investments or projects

- **Title VI of the Civil Rights Act**

- Integrates Title VI considerations into all public participation activities to prevent discrimination based on race, color, or national origin.
- Ensures participation opportunities are open to minority populations, low-income individuals, people with disabilities, and LEP populations.
- Commits to targeted outreach to overcome linguistic, cultural, institutional, and economic barriers to participation.
- Provides a formal Title VI complaint process through GCRPC for individuals alleging discrimination.
- Limited English Proficiency (LEP) Complies with Executive Order 13166 and DOT LEP Guidance to ensure meaningful access for LEP individuals. Implements a Four-Factor Analysis as part of its Title VI Program to determine appropriate language assistance measures.
- Follows the Safe Harbor Provision, providing written translation of vital documents when an LEP language group meets the 5% or 1,000-person threshold, whichever is less. Provides oral interpretation services and non-written input options (oral, audio, video) when appropriate.
- Public Notice & Accessibility
  - Publishes public notices in English and Spanish for major events. Ensures notices and materials comply with the ADA.
  - Maintains a minimum 21-day public comment period for major service or fare changes. Publishes meeting notices at least 10 days in advance, including purpose, time, date, and location.

- **Documentation & Effectiveness**

- Documents all outreach activities and public comments received for major events.
- Evaluates outreach effectiveness, including demographic reach when feasible, to ensure engagement of priority populations.
- Maintains records through GCRPC and shares documentation with the Victoria MPO as appropriate.

## Public and Stakeholder Outreach Methods

The tables below evaluate a range of public outreach methods used by the Victoria MPO, City of Victoria and GCRPC, rating each method on level of interest, documenting past use, and collecting comments that reveal practical considerations, costs, and implementation potential. Below are some notable trends and observations from the survey results:

*Choices for "Level of Interest" = Use Regularly, Have Used Before, Open to Using, Not Interested, or Unsure.*

Outreach Method / Procedure	Level of Interest
Post print materials	Have Used Before
Transit stops and bus QR codes	Have Used Before
Mailing notices or flyers	Open to Using
Local media (newspapers, radio, television)	Use Regularly
Social media platforms	Use Regularly
In-person translation	Open to Using
Public meetings	Have Used Before
Public hearings	Use Regularly
Staff attending community events/ pop-up tabling	Have Used Before
Partnering with local organizations	Use Regularly
Targeted surveys	Open to Using
Collect participant data	Use Regularly
Regular online comment form	Open to Using
Ongoing Steering Committee	Open to Using
Project Advisory Committees	Open to Using
Virtual meetings	Open to Using
Project-specific websites	Have Used Before
Press releases and media alerts	Use Regularly

Extra meetings/workshops in affected areas	Open to Using
Summary of Feedback	Open to Using

## Surveys

A bilingual (English/Spanish) Victoria Transit Public Engagement Survey was designed to collect public input on proposed transit route changes as part of Victoria Transit’s route planning and public participation efforts. The survey seeks feedback from riders and non-riders on current transit usage, trip purposes, and how proposed route alignments may affect access to key destinations such as jobs, schools, healthcare, and shopping.

The survey asks respondents to evaluate the anticipated impacts of route changes, identify locations that may be underserved, and suggest future bus stop locations by specifying routes and intersections. It also gathers input on accessibility and convenience, including the ease of walking or biking to new route alignments and whether the proposed network adequately serves major community destinations.

Surveys were distributed through multiple channels, including mailers inserted and distributed in water bills on October 16, 23, and 30, 2025, as well as through riders’ surveys on-board buses and at transit stops between October 8 and 20, 2025. Respondents could return completed surveys by mail, at designated drop-off locations, or by uploading their responses to the project webpage. An interactive online map and survey were also developed to gather public feedback. The map and survey were accessible on both desktop and mobile devices and offered English and Spanish language options. Users could complete a public survey, comment on specific routes, and suggest new stops or identify underserved areas directly within the map interface. To maximize participation, a QR code was included on outreach materials and direct links to the interactive map were included on the project webpage, making it easy for respondents to access the online survey.

To support inclusive engagement and Title VI compliance, the survey was made available in both languages, offering multiple submission methods (mail, hand delivery, and online via QR code), and invited participants to sign up for future transit updates and planning discussions. A map of the draft Victoria Transit network with routes, key destinations, walk-sheds, and ADA buffers was included to help respondents visualize proposed changes and provide informed feedback. A detailed summary of the survey methods and results are provided in the Outreach Summary Report.

## Public and Stakeholder Outreach Events and Meetings

A series of in-person outreach events and meetings were conducted between August 2025 and November 2025 to enable direct interaction with stakeholders and community members, providing a forum to receive input on proposed new routes and bus stops, as well as other transit-related issues. Project Information materials and notifications were developed and

disseminated to stakeholders and the public to provide feedback on proposed newly designed bus routes and stop locations for Victoria Transit, emphasizing improvements to travel times, service coverage, and overall rider experience. All project materials were developed in both English and Spanish and explained that the effort is part of Victoria Transit's broader Public Engagement Plan, which focuses on developing a Public Participation Plan, documenting federal compliance, and actively engaging community members in the decision-making process.

Project outreach materials also outlined next steps in the project, including reviewing public feedback, drafting required documentation, and adopting final routes. It directs community members to a project website via a QR code to learn more and submit input. A map of the Victoria Transit draft network was included to help the public visualize proposed routes, key destinations, high-density housing areas, walk-sheds, ADA buffers, and service coverage within city boundaries, supporting informed and meaningful participation.

The Victoria Transit Public Engagement Plan stakeholder presentation summarized how Victoria MPO plans to engage the community to gather input on a transit route study and proposed service changes while ensuring compliance with Title VI and federal public participation requirements. The effort centered on implementing a Public Participation Plan that integrates review of prior planning and Title VI documentation with broad, inclusive outreach using in-person meetings, digital tools, surveys, and a dedicated project webpage.

Engagement activities targeted riders, non-riders, community partners, and agencies through pop-up events, workshops, multilingual materials, stakeholder briefings, and outreach at accessible community locations and events. Feedback collected informed route recommendations, draft transit stop locations, and a service impartiality analysis to ensure proposed changes do not disproportionately affect minority or low-income populations. The process followed a defined project schedule extending through late 2025 and concludes with a framework to continue public participation efforts for future phases to advance implementation of the proposed new Victoria Transit routes and bus stops. A detailed summary of the stakeholder and public outreach events, meetings and comments received are provided in the Outreach Summary Report.