Exhibit A

City of Santa Rosa
Transportation and Public Works Department, Transit Division

Santa Rosa CityBus Title VI Program

Revised March 2025

I. Overview

Title VI of the Civil Rights Act of 1964 is a federal statute that provides that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. All programs receiving financial assistance from the Federal Transit Administration (FTA) are subject to Title VI and the U.S. Department of Transportation's implementing regulations at 49 CFR part 21. As the operator of Santa Rosa CityBus, the City of Santa Rosa's Transit Division (within the Transportation and Public Works Department) is a recipient of financial assistance from FTA.

FTA requires that all direct and primary recipients of FTA financial assistance document their compliance by submitting a Title VI Program to their regional civil rights officer once every three years. The Title VI Program must be approved by the recipient's governing body, in this case the Santa Rosa City Council, prior to submission. The required elements of the Title VI Program, as well as overall requirements for ensuring compliance with Title VI, are detailed in FTA Circular 4702.1B (dated October 1, 2012). The City of Santa Rosa's Transit Division has prepared this Title VI Program in accordance with these requirements.

The Title VI Program encompasses the following areas:

- Public notice of the protections from discrimination provided by Title VI
- Procedures for filing a Title VI complaint
- Public participation plan
- Language assistance plan
- Racial breakdown of the membership of non-elected advisory boards or committees
- Equity analysis related to determination of the site or location of new transit facilities
- Systemwide service standards and policies

II. Title VI Notice to the Public

Title 49 CFR 21.9(d) requires that recipients provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, recipients shall post a Title VI notice on the agency's website and in the public areas of the agency's office(s), such as reception desk and meeting rooms. Recipients are also advised to post Title VI notices at stations or stops and/or on transit vehicles.

The Title VI notice must include:

1) A statement that the agency operates programs without regard to race, color, or national origin,
2) A description of the procedures that members of the public should follow in order to request additional information on the recipient's Title VI obligations, and
3) A description of the procedures that members of the public shall follow in order to file a Title VI discrimination complaint against the recipient.

The required Title VI Notice is provided via the Santa Rosa CityBus Non-Discrimination Policy. A copy of the Non-Discrimination Policy is provided in Appendix A.

The Non-Discrimination Policy is available on the Transit Division website, in public areas of the Transit Division offices at the Transit Operations Building, on posters at major transit hubs, and onboard every CityBus revenue vehicle.

III. Title VI Complaint Procedures

In order to comply with 49 CFR 21.9(b), recipients must develop procedures for investigating and tracking Title VI complaints filed against them and make the procedure for filing a complaint available to the public. Recipients must also develop a Title VI complaint form. The complaint form and procedure for filing a complaint must be available on the recipient's website.

The Santa Rosa CityBus procedure for filing and investigating Title VI complaints is provided in Appendix B. The Title VI Complaint Form is also included in Appendix B. The Title VI complaint procedures and form are available on the Transit Division website, in English and Spanish as well as any other language(s) indicated by Language Assistance Plan implementation. In addition, information about filing a Title VI complaint is included in the Santa Rosa CityBus Non-Discrimination Policy.

IV. Title VI Investigations, Complaints, or Lawsuits

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

Since the last Title VI Program submission (in May 2022), the Transit Division has received the following four complaints alleging discrimination based on race, color, or national origin. These complaints were investigated in accordance with the Transit Division's adopted procedures for investigating, tracking, and responding to Title VI complaints.

Date	Description	Status/Actions Taken
11-30-22	A rider's sister called about an incident her sister experienced onboard a bus with another passenger who was acting strangely and making accusations against other passengers. The rider's sister felt the driver didn't do anything to help because the disruptive passenger was white.	The investigation found that the Bus Operator followed protocol and contacted the Supervisor on Duty about the disruptive passenger. SRPD was called and the disruptive passenger was removed from the bus. The investigation did not substantiate the caller's assertion that the Bus Operator did nothing to help with the situation. Follow-up with the rider who experienced this incident found that she was satisfied with the response. No evidence of discrimination was found.
4-14-23	Rider called to say a bus driver treats brown and black people rudely, while white people are treated with respect.	Rider was contacted for follow-up on this comment but the investigation was limited by lack of specific dates/times for incidents and/or onboard camera footage. The staff person in question was interviewed and counseled about expectations for passenger interactions.
6-13-23	Rider called to complain that after he boarded the bus and paid his fare the bus operator began questioning him and then stated "You're not supposed to be on the bus"	The incident was investigated using onboard video and a Bus Operator interview and it was found that the operator mis-identified the complainant as an individual who was suspended from the system at that time due to having made inappropriate physical

	using a negative demeanor. The Rider stated that he felt profiled.	contact with a different CityBus Bus Operator. The Bus Operator's handling of the situation was addressed and improved photos were provided to all staff to prevent further cases of mistaken identity. No evidence of discrimination was found.
8-13-23	Rider reported that as she ran to catch a bus the driver pulled away without letting her board. The rider felt the driver's actions showed bias and was discriminatory.	Rider was contacted for follow-up on this incident. The Bus Operator was interviewed but stated she did not remember this incident. The investigation was limited by lack of onboard camera footage for that bus trip.

V. Public Participation Plan

Recipients are required to comply with the public participation requirements of 49 USC Sections 5307(b) and 5307(c)(1)(I). These sections require a locally-developed process to consider public comment before raising a fare or carrying out a major reduction in transportation service. Recipients are required to submit a Public Participation Plan as part of their Title VI Program that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submission.

The Santa Rosa CityBus Public Participation Plan is provided in Appendix C.

Since May 2022, the Transit Division has conducted the following outreach activities:

- Outreach/Tabling at Community Events: CityBus staff routinely participate in community events engaging diverse groups within the Santa Rosa community. Since the last Title VI Program update, these have included major City-sponsored events like Santa Rosa's Earth Day festival, neighborhood festivals such as Roseland Cinco de Mayo, and events sponsored by community partners, such as the Chop's Teen Club Open House, Disability Services and Legal Center's annual Tech Expo, and the Los Cien Youth Perspective Event. At these events staff provide information about CityBus services, seek rider feedback, and engage the public about specific transit system changes being planned or implemented. Events are staffed with bilingual staff whenever possible, and always for events expected to engage large numbers of Spanish speakers.
- CityBus Outreach Regarding Transit Service Needs: In addition to hosting public meetings, Transit Division staff meet with groups at their locations to discuss transit services either as part of evaluation of service changes or to gain general feedback on needs or issues. Staff coordinate with community contacts/hosts to determine if

interpretation is needed. Examples from the past three years include a service design charrette with residents of Vintage Bennett Valley Senior Housing in June 2023 and a discussion with residents of the Spring Lake Village Retirement Community about transit and paratransit service options and needs in February 2025.

- Language Assistance Plan Outreach: CityBus conducts targeted outreach to limited English speakers and stakeholder agencies serving large numbers of limited English speakers as part of our Language Assistance Plan updates.
- Paratransit Public Engagement:
    - The Paratransit Users Group (PUG) is made up of paratransit users and is an informal public group meeting, specific to CityBus service. The PUG meets periodically and is open to all paratransit users (many of whom also use the fixed-route system).
    - Transit Paratransit Coordinating Committee (TPCC): The Sonoma County Transportation Authority (SCTA) hosts the Transit Paratransit Coordinating Committee (TPCC) that brings together transit riders and regional operators to discuss and allow the public to inquire directly with agency staff (including CityBus staff and paratransit contractor) about primarily paratransit matters but also fixed route concerns.
- Rider Surveys: Several rider surveys were conducted since the last Title VI Program update. Surveys are offered in English and Spanish at a minimum, and typically are available onboard buses and in transit facilities as well as online. During the review period these surveys included:
    - Short Range Transit Plan survey (June 2022): This survey was intended to refresh rider feedback on service needs and priorities following the pandemic.
    - Route 9 realignment survey (April-May 2023): This survey was used to solicit rider feedback on a proposed change to the alignment of CityBus Route 9.
    - Integrated Transit Service Plan Survey (May 2023): This survey was conducted onboard buses and in transit facilities to solicit rider feedback on opportunities to better coordinate local transit services in Sonoma County.
- School Outreach: CityBus works to serve the needs of the schools and youth through-out the community. Outreach to schools continues to be critical to implementation of CityBus' fare-free youth program. Multiple meetings were held with school administrators, teachers, and students in the past three years.
- Travel Training: CityBus offers travel training to individuals and organizations throughout the community. In many cases these trainings provide an opportunity to gain feedback from riders and agency stakeholder staff on transit service needs and issues.

VI. Providing Meaningful Access to Limited English Proficiency (LEP) Persons/Language Assistance Plan

Consistent with Title VI, the U.S. Department of Transportation (DOT) implementing regulations, recipients must take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP).

Recipients are required by FTA to conduct a "Four Factor Analysis" consistent with DOT's LEP guidance, as well as develop a Language Assistance Plan based on the results of the analysis. The Language Assistance Plan shall 1) include the results of the Four Factor Analysis, 2) describe how the recipients provides language assistance services by language, 3) describe how the recipient provides notice to LEP persons about the availability of language assistance, 4) describe how the recipient monitors, evaluates, and updates the language assistance plan, and 5) describe how the recipient trains employees to provide timely and reasonable language assistance to LEP persons.

A copy of the 2025 Santa Rosa CityBus Language Assistance Plan is provided as Appendix D.

VII. Minority Representation on Planning and Advisory Bodies

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

The City of Santa Rosa does not currently have any transit-related, non-elected boards, councils, or committees. The Santa Rosa City Council serves as the policy board for Santa Rosa CityBus.

VIII. Subrecipient Compliance

Primary recipients of FTA financial assistance are required to provide assistance to subrecipients of federal financial assistance to support subrecipients' compliance with Title VI

regulations. Primary recipients are also required to monitor subrecipients for compliance with regulations. The City of Santa Rosa does not extend FTA financial assistance to subrecipients.

IX. Determination of Site or Location of Facilities

Per 49 CFR 21.9(b)(3), recipients may not select the site or location of facilities with the purpose or effect of excluding persons from, denying the benefits of, or subjecting them to discrimination on the basis of race, color, or national origin. Per 49 CFR 21, Appendix C, the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.

Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, and operations centers. Bus shelters are not included in this provision as they are considered transit amenities and are covered by regulations discussed in Section X of this Title VI Program. Transit stations, power substations and similar facilities are not included in this provision as they are evaluated during project development and the NEPA process.

For facilities covered by this provision, recipients are required to:

1) Complete a Title VI equity analysis during the planning state with regard to where a project is located to ensure the location is selected without regard to race, color, or national origin, and engage in outreach to persons potentially impacted by siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.

2) Give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure proper analysis of localized impacts.

3) Provide substantial legitimate justification for locating a project in a location that will result in a disparate impact on the basis of race, color, or national origin, and show that there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. In order to show that both tests have been met, the recipient must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

The City of Santa Rosa has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements were developed since the last Title VI Program submission in May 2022.

X. Systemwide Service Standards and Policies

The requirement to set systemwide service standards and policies relates to the general prohibition on discrimination on the basis on race, color, or national origin (49 CFR 21.5) as well as the requirement that no person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of service of transportation service on the basis of race, color, or national origin (49 CFR 21, Appendix C). Specifically, frequency of service, age and quality of transit vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color, or national origin.

Providers of fixed-route public transportation services are to set service standards and policies for each fixed-route mode provided. The standards and policies must address how services and amenities are distributed across the transit system, and ensure that service design and operations practices do not result in discrimination on the basis of race, color, or national origin. Specific quantitative standards are required for the following indicators: 1) vehicle load, 2) vehicle headway, 3) on-time performance, and 4) service availability (a measure of how routes are distributed within the service area). Policies are required for the following service indicators: 1) distribution of transit amenities (including seating, shelters, printed and digital information, escalators, elevators, and waste receptacles) for each fixed-route mode operated, and 2) vehicle assignment for each fixed-route mode operated.

Adopted service standards and policies for Santa Rosa CityBus are provided in Appendix E.

Appendix A

Non-Discrimination Policy
(Title VI Notice to the Public)

Santa Rosa CityBus

NON-DISCRIMINATION POLICY

Santa Rosa CityBus operates its transit service subject to the nondiscrimination requirements under Section 601 of Title VI of the Civil Rights Act of 1964 (Title VI) and applicable regulations from the U.S. Department of Transportation, U.S. Department of Justice, and other applicable Federal laws and regulations.

Pursuant to its Title VI Program, Santa Rosa CityBus ensures that no person in its service area 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 its services and programs. For more information on our nondiscrimination obligations call (707) 543-3333 or visit our web page for a copy of our current Title VI Plan (www.srcitybus.org).

You may file a signed, written complaint within 180 days from the date of alleged discrimination. A Title VI Complaint Form is available at www.srcitybus.org, or you may call Customer Service at (707) 543-3333 and ask for the form to be sent to you. You may also submit a signed, written statement that includes the following:

- Your name, mailing address, and how to contact you (i.e., telephone number, email address, etc.)
- The basis of the complaint (e.g., race, color, or national origin).
- The date on which the alleged discriminatory incident occurred.
- A detailed description of the incident, e.g., how, when, where, and why you believe you were discriminated against. Include the names and contact information of any witnesses. If the incident occurred onboard a bus, please provide the time of day, route number, and bus number if available.
- Other information that you deem significant.

File the written complaint at the address listed below:

City of Santa Rosa Human Resources Department
Attn: Risk Manager
100 Santa Rosa Avenue, Room 1
Santa Rosa, CA 95404
Phone: (707) 543-3024
Email: Risk@srcity.org

The City's Title VI Officer will send a final written response to the complainant and advise the complainant of his or her right to 1) appeal to the City of Santa Rosa's City Manager within 7 days of receipt of the final written decision, and/or 2) file a complaint externally with the U.S.

Department of Transportation and/or the Federal Transit Administration. The City of Santa Rosa will make every effort to respond to Title VI complaints within 60 working days of receipt of such complaints.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the Federal Transit Administration (FTA) or US Department of Transportation:

Federal Transit Administration
Office of Civil Rights
Federal Transit Administration
1200 New Jersey Avenue, SE
Washington, DC 20590
Phone: 1-888-446-4511

Region 9 Office
Federal Transit Administration
Attn: Regional Civil Rights Officer
888 S Figueroa St., Suite 440
Los Angeles, CA 90017
Phone: 213-757-5999

US Department of Transportation
Departmental Office of Civil Rights
1200 New Jersey Avenue, SE
Washington, DC 20590
Phone: 202-366-4648

Appendix B

Title VI Complaint Procedure and Complaint Form

Santa Rosa CityBus

PROCESS FOR FILING AND INVESTIGATING TITLE VI COMPLAINTS

What is Title VI of the Civil Rights Act of 1964?
Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving Federal financial assistance.

Santa Rosa CityBus is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI of the Civil Rights Act of 1964. You may also find more information on compliance requirements placed on public transit operators as they relate to Title VI in Federal Transit Administration (FTA) Circular 4702.1B. If you believe you have been subjected to discrimination under Title VI, you may file a complaint.

How to file a Title VI Complaint?
You may file a signed, written complaint 180 days from the date of alleged discrimination. You may download a Title VI Complaint Form from the CityBus website (www.srcitybus.org) or you may call Customer Service at (707) 543-3333 and ask for a Title VI Complaint Form to be sent to you. You may also submit a signed, written statement that contains the following information:

- Your name, mailing address, and how to contact you (i.e., telephone number, email address, etc.)
- The basis of the complaint (e.g., race, color, and/or national origin).
- The date on which the alleged discriminatory incident occurred.
- A detailed description of the incident, e.g., how, when, where, and why you believe you were discriminated against. Include names and contact information of any witnesses. If the incident occurred onboard a bus, please provide the time of day, route number, and bus number if available.
- Other information that you deem significant.

The complaint may be mailed or delivered to the following address:

City of Santa Rosa
Human Resources Department
Attn: Risk Manager
100 Santa Rosa Ave.
Santa Rosa, CA 95404
Phone: (707) 543-3024
Email: Risk@srcity.org

CityBus encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily.

NOTE: The Transit Division's Title VI Program Officer may assist with writing a complaint if the complainant is unable to do so. The Title VI Program Officer shall also provide appropriate

assistance to complainants, including persons with disabilities or those who are limited in their ability to communicate in English. You may contact the Title VI Program Officer by phone at 707-543-3333.

What happens to my complaint after it is submitted to Santa Rosa CityBus?
All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by Santa Rosa CityBus will be directly addressed by the City of Santa Rosa's Risk Manager, in coordination with the Title VI Program Officer and other Transit Division staff.

In instances where additional information is needed for assessment or investigation of the complaint, the Risk Manager or the Title VI Program Officer will contact the complainant in writing within fifteen (15) working days of receipt of the complaint. Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information by the date indicated may result in the administrative closure of the complaint.

Once sufficient information for investigating the complaint is received, an investigation will be conducted, and the Risk Manager or designee will prepare a written response.

How will I be notified of the outcome of my complaint?
The Risk Manager or Santa Rosa CityBus' Title VI Program Officer will send a final written response to the complainant. The City of Santa Rosa will make every effort to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

What if I disagree with the outcome of my complaint?
The final response will advise the complainant of his or her right to 1) appeal to the City of Santa Rosa's City Manager within seven days of receipt of the final written decision, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

Santa Rosa City Clerk or City Attorney
City Hall, Room 10
100 Santa Rosa Avenue
Santa Rosa, CA 95404
Phone: (707) 543-3010

U.S. Department of Transportation
Departmental Office of Civil Rights
1200 New Jersey Avenue, SE
Washington, D.C. 20590
Phone: (202) 366-4648

Federal Transit Administration Region 9
Attn: Regional Civil Rights Officer
888 S Figueroa St., Suite 440
Los Angeles, CA 90017
Phone: (213) 757-5999

Federal Transit Administration
Office of Civil Rights
1200 New Jersey Avenue, SE
Washington, D.C. 20590
Phone: 1-888-446-4511

Santa Rosa CityBus Title VI Complaint Form

Santa Rosa CityBus is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended.

The following information is necessary to help us in processing your complaint. If you require assistance in completing this form, please contact CityBus Customer Service by calling (707) 543-3333. **Title VI complaints must be filed within 180 days from the date of the alleged discrimination.** The completed form can be returned to the City of Santa Rosa at the following address: City of Santa Rosa Human Resources Department, Attn: Risk Manager, 100 Santa Rosa Avenue, Santa Rosa, CA 95404.

Complainant

Your Name:	Phone:
Street Address:	City, State, Zip Code:

Person(s) alleging discrimination (if different from complainant)
Attach additional page if more space is required.

Name(s):	Phone:
Street Address:	City, State, Zip Code:

Which of the following best describes the reason for the alleged discrimination? (Check one or more)

____ Race

____ Color

____ National Origin, including Limited English Proficiency

Please describe the alleged discrimination incident.

Date of incident: _____ Time of day: _____ Location: _____

Route number (if applicable):_____ Bus number (if applicable):_____

Please explain what happened and who you believe was responsible. Please provide as much detail as possible. More space is available on the back of this form.

_____

_____

_____

Please complete reverse side of form

Santa Rosa CityBus Title VI Complaint Form

Names and contact information for witnesses:

Have you filed a complaint regarding the alleged discrimination with any other federal, state or local agencies? (Check one) ____ Yes ____ No

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

Agency:	Contact Name:	Phone:
Street Address:	City, State, and Zip Code:	

Agency:	Contact Name:	Phone:
Street Address:	City, State, and Zip Code:	

I affirm that I have read the above charge and that it is true to the best of my knowledge, information, and belief.

_____ _____

Complainant's Signature Date

_____

Print or Type Name of Complainant

For City of Santa Rosa Use Only

Date Received: _____

Received By: _____

Appendix C

Public Participation Plan

City of Santa Rosa Transportation and Public Works Department, Transit Division

Policy on Public Participation and Comment (Public Participation Plan)

Revised March 2025

A. Introduction and Policy Statement

The City of Santa Rosa is committed to providing an open and visible decision-making process to which Santa Rosa residents have equal access. As established in City Council Policy 000-20 ("Citizen Participation", dated August 18, 1987), it is the policy of the City Council to actively solicit the involvement of citizens in the public decision-making process, through public notification, media exposure, neighborhood meetings, and public hearings.

Further, it is the policy of the City of Santa Rosa Transit Division to offer early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions. This includes seeking out and considering the viewpoints of minority, low-income, and limited English proficiency (LEP) populations (as well as older adults and people with limited mobility) in the course of conducting public outreach activities, consistent with Federal Transit Administration (FTA) Circular 4702.1B ("Title VI Requirements and Guidelines for Federal Transit Administration Recipients").

B. Public Involvement Plan

Per City Council Policy 000-20, when a project, program or issue may have identifiable impacts on a neighborhood or citizen group, a Public Involvement Plan shall be submitted to the City Manager's Office at the beginning of the project or program. The Plan shall be designed to:

1. Ensure responsiveness to the level of interest and concern expressed by the public;

2. Ensure visibility and understanding by the agencies, groups and individuals who may participate; and

3. Ensure that public involvement is carefully and systematically included as part of the decision-making process.

Per Council policy, Public Involvement Plans for City-initiated projects will be reviewed and approved by the City Manager's Office prior to implementation.

The Public Involvement Plan will be included as part of staff reports for the Council.

C. Public Involvement Principles

The following principles will be used to develop the Public Involvement Plan for Transit Division projects and programs:

- When a project (e.g., construction activity) may affect a neighborhood, special neighborhood meetings will be scheduled early in the project planning process. Notices will be sent to organized neighborhood groups and any individual who has requested notification. (City Council Policy 000-20)

- All public hearing notices shall be written in clear, concise and understandable language and will incorporate graphics when it aids the message. The notices will clearly be identified as a City of Santa Rosa notice. (City Council Policy 000-20)

- The Public Involvement Plan will reflect the Transit Division's policy to provide early and continuous opportunities for the public to be involved in the identification of the impacts of proposed decisions. It will also reflect the Transit Division's policy to seek out the viewpoints of minority, low-income, and Limited English Proficiency (LEP) populations, as well as older adults and people with limited mobility, in the course of conducting public outreach and involvement activities, consistent with the Transit Division's Title VI Program and U.S. Department of Transportation (DOT) LEP Guidance.

- The Public Involvement Plan will be tailored to the populations affected and the type of plan, program, or service under consideration.

- Public meetings will be held in locations that are accessible to transit riders and people with disabilities, and will be scheduled at times that are convenient for members of the public.

- Public meetings and hearings will be broadly advertised in the community in both English and Spanish as well as any other language(s) indicated by Language Assistance Plan implementation (e.g., through posters onboard buses and at major transit stops and facilities, the CityBus website, local print media, social media, and email notification to the Transit Division's outreach mailing list) and notification will be provided regarding the availability of language assistance.

D. Public Comment for Fare Increases and Major Service Changes

Consistent with City Council Policy 000-20 and FTA Circular 9030.1E, it is the policy of the Transit Division to solicit public opinion and consider public comment before raising fares or implementing a major service change.

A public hearing is required prior to implementation of a fare increase or a major service change. A "major" service change is defined as a modification that affects 25% or more of a single route, or 25% or more of all routes. Additional public involvement strategies, such as

public meetings, neighborhood meetings, or other outreach to affected individuals will be implemented as appropriate to solicit public comment for consideration in advance of the public hearing. Public comments received will be compiled and considered prior to finalizing the Transit Division's recommendation to the City Council regarding a fare increase or major service change. A summary of the public comments received will be provided as part of the staff report submitted to City Council for the fare increase or major service change in question.

The public hearing will be scheduled as part of a regular Santa Rosa City Council meeting, and advertised broadly through the City's website, the Transit Division citywide outreach mailing list, and posters and flyers at the Santa Rosa Transit Mall, at major transfer centers, on buses, and at bus stops. The hearing will also be advertised through targeted outreach to neighborhood groups or other organizations and individuals, as appropriate to the proposed change. Notices regarding the public hearing will be provided in both English and Spanish, as well as any other language(s) indicated by Language Assistance Plan implementation. The Santa Rosa City Clerk will additionally post notice of the public hearing in the *Santa Rosa Press Democrat*.

The public hearing will consist of a staff report before the City Council, followed by public testimony.

Attachment 1 provides additional information on practices related to public comment.

E. Targeted Public Outreach to Minority and Limited English Proficient (LEP) Populations

During development of the Public Involvement Plan and/or planning for public engagement in general, the Transit Division will incorporate strategies intended to promote involvement of minority and LEP individuals in public participation activities, as appropriate for the plan, project, or service in question, and consistent with federal Title VI regulations and the U.S. Department of Transportation LEP Guidance.

At a minimum, staff will implement the strategies identified in Section D, including holding public meetings in locations that are accessible to transit riders and people with disabilities, scheduling meetings at times that are convenient for members of the public, advertising meetings and hearings in English and Spanish as well as any other language(s) indicated by Language Assistance Plan implementation, and providing notice of the availability of language assistance.

In addition, Transit Division staff should consider implementing the following public engagement strategies to complement the minimum requirements, as appropriate to the plan, project, or service:

- Using supplemental outreach strategies such as surveys regarding Transit Division projects or proposed service changes.

- Partnering with community organizations to engage members of the public who are less likely to attend traditional public meetings (including LEP populations) through means such as surveys and focus groups. The Transit Division maintains a list of current and potential future community partners.

- Attending community events and meetings of neighborhood associations, faith-based organizations, advocacy groups, and other groups to solicit feedback from diverse members of the public.

Transit Division staff may consult FTA Circular 4703.1 ("Environmental Justice Policy Guidelines for Federal Transit Administration Recipients") for additional strategies that may be incorporated into the Public Involvement Plan.

ATTACHMENT 1

ADDITIONAL INFORMATION ON PROCESS FOR SOLICITING PUBLIC COMMENT ON SERVICE CHANGES

Proposed service changes are developed by Transit Division staff. Once proposals are finalized, printed and digital information is created that explains the proposed changes. These informational materials (available in English and Spanish as well as any other language(s) indicated by Language Assistance Plan implementation) are posted online, placed on buses, and used as handouts at public informational meetings and hearings. Flyers and posters that direct interested individuals to these materials are also posted on the buses, at Transit Division offices, at Transfer Centers, and are provided to facilities (libraries, senior communities, human service organizations, schools, etc.) which are likely to be impacted by the service changes.

Any interested individual is invited to make comments. Comments may be submitted in person at the public informational meetings and public hearings. They may also be submitted by mail, Tell Us (comment) Card, phone, email, and online via the City's website.

Information about scheduled public meetings is available via:

1. Bus posters
2. Bus stop posters
3. City Council agenda
4. Posters in Transit Division offices and transfer stations
5. CityBus website
6. Appropriate venues, such as senior communities, human service organizations, and schools
7. Email notifications
8. Social media

All comments received are reviewed by Transit Division staff and considered in development of final recommendations.

Appendix D

Language Assistance Plan

Santa Rosa CityBus

Language Assistance Plan

2020

Contents

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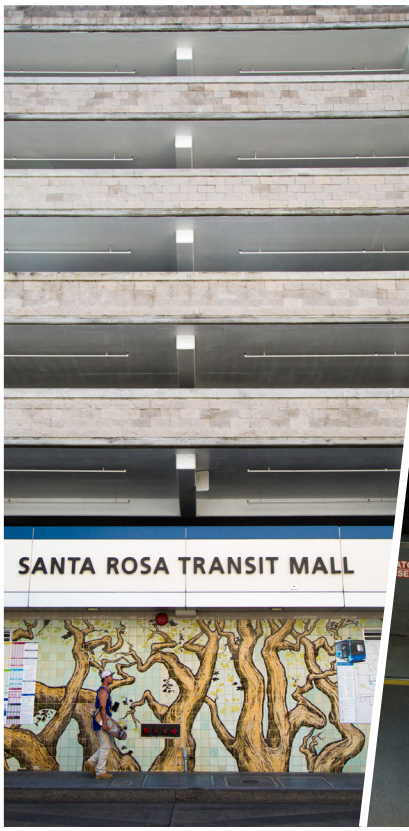


I. Introduction

This Language Assistance Plan facilitates the City of Santa Rosa Transit Division's efforts to provide an appropriate mix of language assistance measures. These measures help meet the needs of individuals within the Santa Rosa CityBus service area who are "limited English proficient". Limited English proficient (LEP) individuals are those who have a limited ability to read, write, speak, or understand English. The plan includes demographic analyses, surveys of Santa Rosa CityBus and Santa Rosa Paratransit staff, input from community organizations serving LEP individuals, and feedback from LEP individuals themselves. This plan also summarizes language assistance measures Santa Rosa Transit Division is using and measures it is planning to use in the future.

II. Background

Title VI of the Civil Rights Act of 1964 states 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 otherwise subjected to discrimination under any program or activity that receives federal financial assistance. Title VI regulations have been interpreted to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes a form of national origin discrimination.

This plan uses the "Four-Factor Framework" outlined in the U.S. Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (DOT LEP Guidance, Federal Register, vol. 70, no. 239, pp. 74087-74100, December 14, 2005). The Transit Division has applied the Four-Factor Framework according to guidance provided in the Federal Transit Administration Office of Civil Rights' Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers (April 2007).

III. Analysis Using the Four Factor Framework

Factor 1: The number and proportion of LEP persons served or encountered in the eligible service population.

Task 1 - Step 1: Examine prior experiences with LEP individuals

A survey of Santa Rosa CityBus and Santa Rosa Paratransit staff who interact with the public was administered in February 2025 to gauge prior experience with LEP individuals. The number of responses received for each operational section is displayed in Table 1.

Table 1: Break Out of Staff Response from each Operational Section

Operational Section	# of Employee Responses
Fixed Route Operations	18
Paratransit Operation	9
Customer Service Staff	1
Operations Supervisor	7
Administrative Staff	7
Other	5
Total	47

Staff were also surveyed about the frequency of their interactions with LEP individuals. Table 2 ranks out this frequency.

Most Common Questions from LEP Individuals to Staff

1. What time does my bus arrive?
2. How do I get to my destination?
3. How much do I pay to ride the bus?

Table 2: Number of staff interactions with LEP individuals each week

Operational Section	0 - 5	6 - 20	21 - 39	40+
Fixed Route Operations	1	5	6	6
Paratransit Operation	6	1	2	0
Customer Service Staff	0	1	0	0
Operations Supervisor	4	2	1	0
Administrative Staff	5	1	1	0
Other	5	0	0	0
Total	21	10	10	6

Fixed route operations staff proportionally have the most interactions with LEP individuals. A third of fixed route operations staff stated having 40 or more interactions with LEP individuals.

Most common language encountered by all staff

Spanish

Most importantly staff rated themselves on their ability to effectively communicate with LEP individuals. The self-ratings in Table 3 show just over 60 percent of responding staff across all operational sections feel they can communicate effectively "most of the time".

Table 3: Staff's Ability to Effectively Communicate with LEP Individuals

Operational Section	Most of the Time	Some of the Time	Not Very Often
Fixed Route Operations	14	2	2
Paratransit Operation	7	1	1
Customer Service Staff	1	0	0
Operations Supervisor	4	3	0
Administrative Staff	4	2	1
Other	0	4	1
Total	30	12	5

Task 1 - Step 2: Become Familiar with data from the U.S. Census

Task 1 - Step 2A: Identify the geographic boundaries of the area your agency serves

Santa Rosa CityBus defines its service area as the city limits of Santa Rosa, including the Oakmont senior community in southeastern Santa Rosa. The Santa Rosa Paratransit service area extends ¾ mile beyond the CityBus fixed route service. For this analysis, data have been collected for the City of Santa Rosa area.

Task 1 - Step 2B: Obtain Census data on LEP population in your service area

CityBus staff obtained data from the American Community Survey – U.S. Census Bureau Releases 2023 ACS 5-Year Estimates.

Task 1 - Step 2C: Analyze the data you have collected

Table 4 provides a ranking of languages spoken in the CityBus service area by their population size. The most significant non-English language populations speak Spanish, Other Indo-European Languages, Other Asian and Pacific Island languages.

Table 4: Language Populations Spoken in Santa Rosa Ranked

Language Spoken at Home	Estimate
Speak only English	110,694
Spanish:	44,340
Other Indo-European languages:	2,835
Other Asian and Pacific Island languages:	2,232
Tagalog (incl. Filipino):	1,581
Vietnamese:	1,485
Chinese (incl. Mandarin, Cantonese):	1,260
Other and unspecified languages:	1,029
French, Haitian, or Cajun:	927
German or other West Germanic:	841
Arabic:	539
Korean:	437
Russian, Polish, or other Slavic languages:	325

U.S. Census Bureau, 2023 American Community Survey 5-year Estimates (Table C16001 Language Spoken at Home for Population 5 Years and Older)

Spanish speakers are the largest population within languages spoken in Santa Rosa. This is unsurprising as staff indicated Spanish as the predominant language they encounter on a day-to-day basis.

Asian languages were also encountered by staff, predominantly Mandarin Chinese and Tagalog.

Almost half (46%) of Spanish speakers speak English less than "very well" as seen in Table 5. Individuals speaking English less than very well for Chinese and Vietnamese make up 69% and 81% of those populations respectively. Vietnamese specifically meets the Safe Harbor threshold with a population of 1,045 individuals speaking English less than very well. This is a dramatic jump from the previous plan.

Table 5: Residents Five Years and Older Speaking English "less than Very Well"

Language Spoken at Home	Estimate
Total:	168,525
Speak only English	**110,694**
Spanish:	**44,340**
Speak English "very well"	23,992
Speak English less than "very well"	20,348
French, Haitian, or Cajun:	**927**
Speak English "very well"	746
Speak English less than "very well"	181
German or other West Germanic languages:	**841**
Speak English "very well"	738
Speak English less than "very well"	103
Russian, Polish, or other Slavic languages:	**325**
Speak English "very well"	297
Speak English less than "very well"	28
Other Indo-European languages:	**2,835**
Speak English "very well"	1,862
Speak English less than "very well"	973
Korean:	**437**
Speak English "very well"	146
Speak English less than "very well"	291
Chinese (incl. Mandarin, Cantonese):	**1,260**
Speak English "very well"	657
Speak English less than "very well"	603
Vietnamese:	**1,485**
Speak English "very well"	440
Speak English less than "very well"	1,045
Tagalog (incl. Filipino):	**1,581**
Speak English "very well"	982
Speak English less than "very well"	599
Other Asian and Pacific Island languages:	**2,232**
Speak English "very well"	1,442
Speak English less than "very well"	790
Arabic:	**539**
Speak English "very well"	366
Speak English less than "very well"	173
Other and unspecified languages:	**1,029**
Speak English "very well"	720
Speak English less than "very well"	309

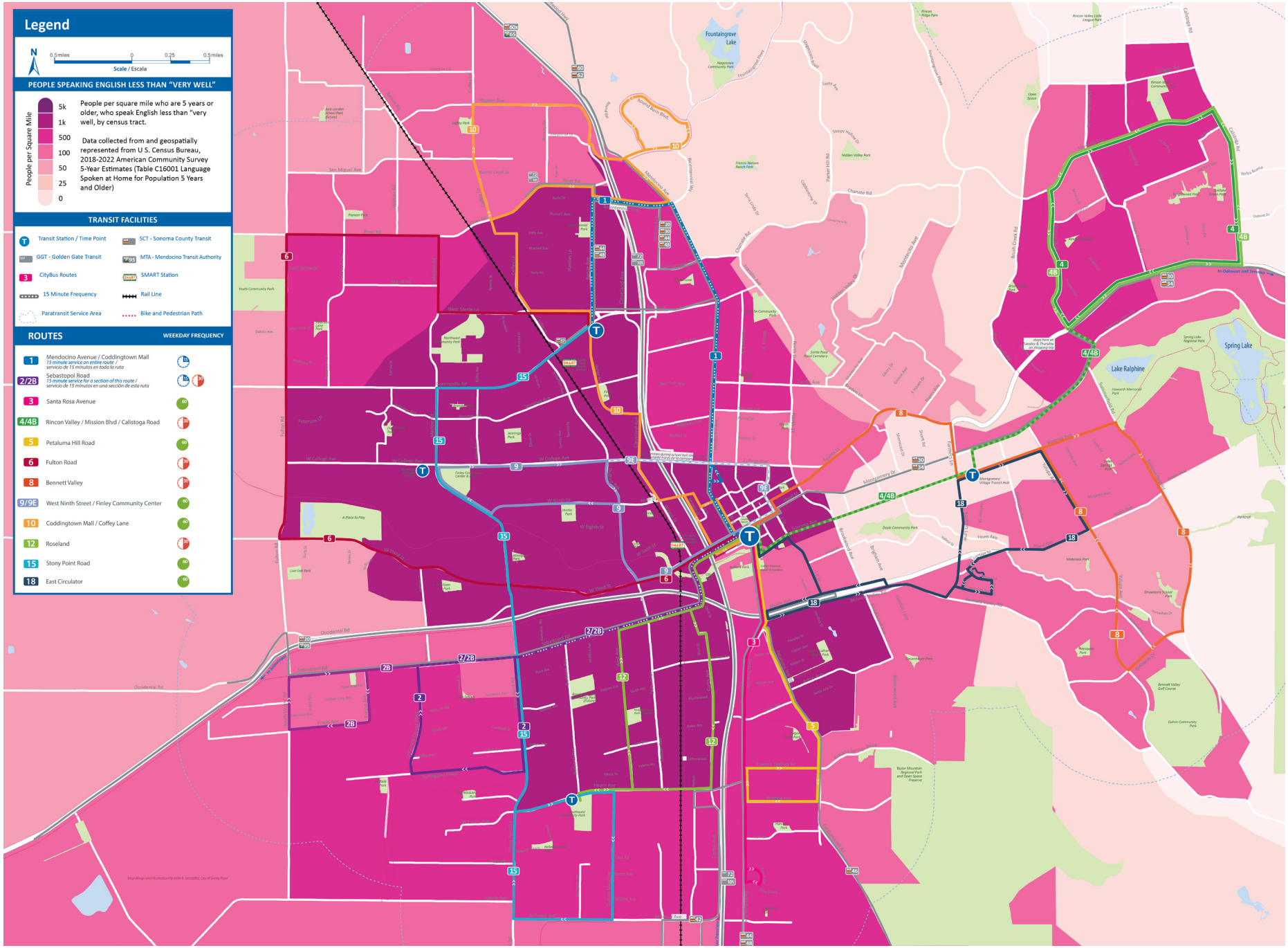
U S. Census Bureau, 2023 American Community Survey 5-Year Estimates (Table C16001 Language Spoken at Home for Population 5 Years and Older)

Task 1 - Step 2D: Identify any concentrations of LEP persons within your service area

Figure 1 identifies the number of households with limited English-speaking status per square mile, by Census tract. The areas with the highest concentrations of household with limited English-speaking status are found west of Highway 101. This pattern is consistent with the last plan but there are more higher concentrations of LEP populations, specifically in the area between Guerneville Rd and Highway 12. This concentration also extends northward along Highway 101 almost reaching the tip of CityBus's service area. One can also see a dense cluster in the downtown and just south of the downtown area.

Routes serving these concentrations have some of the highest frequency in the CityBus system with further increases planned for the future.

Figure 1: People Speaking English Less Than "very well" per Square Mile by Census Tract



Task 1 - Step 3: Consult state and local sources of data

Data from the California Department of Education was analyzed to identify the languages spoken by English Language learners in Santa Rosa schools. Being able to engage effectively with this population is specifically important due to the fact that 33 percent of CityBus ridership is of school age. Table 6 lists the languages spoken by English Language Learners at Santa Rosa schools. In line with previous data the largest population of English Language Learners is Spanish speakers at 4,710 students. Vietnamese speakers represent the second highest population albeit at much lower numbers. However, even with low numbers this trends with the population seen in the full census numbers.

Table 6: English Language Learners at Santa Rosa Schools By Language Spoken, 2021

Language Spoken	Population
Spanish	4,710
Vietnamese	68
Other non-English languages (Uncoded)	64
Mon-Khmer languages (Cambodian)	56
French	42
Philippine languages	36
Panjabi; Punjabi	24
Tigrinya	24
Mandarin (Putonghua, Guoyu)	22
Fijian	20
Russian	20
Lao	18
Portuguese	14
Cantonese	12
Arabic	10
Haitian; Haitian Creole	10
Nepali	10
Persian (Farsi)	10
Thai	10
Hindi	8
Turkish	6
Italian	4
Korean	4
Samoan	4
Bengali	2
Central American Indian languages	2
Gujarati	2
Hmong; Mong	2
Japanese	2
Otomian languages (Mixteco)	2
Swahili	2
Taiwanese	2
Urdu	2
Kikuyu (Gikuyu)	1
Cebuano (Visayan)	1
Swahili	1
Mixteco	1

California Department of Education, Educational Demographics office 2023-24 data

Task 1 - Step 4: Community organizations that serve LEP persons

Task 1 - Step 4A: Identify community organizations

Community organizations and social service agencies serving large numbers of LEP individuals were identified using the Santa Rosa Transit Division's database of community organizations and by consulting with the City's Communications and Intergovernmental Relations Department

Task 1 - Step 4B: Contact relevant community organizations

CityBus staff used an internal community organization contact list as well as a list of contacts from the City of Santa Rosa's Community Engagement Department. Overall 50+ contacts were sent a survey asking about population served, the transportation needs of the client population, demographic trends among the population, and effective ways to obtain input from the population.

Unfortunately, despite the robust contact list and follow up via phone from staff, CityBus was only able to collect ten responses during the two-week period the survey was active. Staff did have an in-depth conversation about community needs with the City's Community Engagement Manager. She provided insight into what CityBus can do to broaden

communication specifically using Spanish language radio and placing more material at community gathering locations.

Staff do work with many of these organizations on a regular basis and have received excellent feedback from them regarding service planning and fares, in addition to having an open channel to communicate about language assistance needs.

Task 1 - Step 4C: Obtain information

As stated in the previous task, staff issued a survey to better understand how their LEP clients interact with the public transit system.

Spanish was the predominate language spoken by their LEP populations which is unsurprising given that the Census data indicated Spanish Speakers as the largest population in Santa Rosa that speaks English "less than very well". Vietnamese was not encountered by any of the respondents.

Factor 2: The frequency with which LEP individuals come into contact with your programs, activities, and services

Task 2 - Step 1: Review the relevant programs, activities, and services you provide

Fixed route transit and ADA paratransit are the two services provided by Santa Rosa CityBus. LEP individuals interact with the service on a daily basis by either using the services directly or seeking out information about the services. The means by which LEP individuals seek out information about the two services varies from person to person. Interactions include talking to bus operators, customer service staff, supervisors, referring to printed informational material, and using online information sources like the CityBus website and social media outlets.

Task 2 - Step 2: Review Information Obtained from Community Organizations

Despite the low volume of responses staff found that there are areas to improve communication to LEP individuals. When asked whether clients were able to easily find and understand information on transit services there was a 50/50 split in the responses. However, this differs from the feedback directly from the public who stated they were able to easily find information on transit. Staff also asked the organizations the best way to provide information to their clients. Physical written material and electronic forms were cited as the best ways. When it came to working with Asian populations organizations suggest always providing the material in English and they would translate as needed due to wide array of dialects spoken within those communities. New types of information recommended in Task 4 will need to be scrutinized for their clarity in English to ensure ease of translation into other languages.

Task 2 - Step 3: Consult Directly with LEP Persons

CityBus staff conducted an online survey targeted to Spanish speaking transit riders in the Santa Rosa CityBus service area. The survey was entirely in Spanish and all free form responses were entirely in Spanish.

During the survey period staff was able to collect 20 unique responses. Of those 20 responses, 80% stated they spoke English less than very well with roughly the same amount (76%) stating that they had the same ability to read English.

Respondents were asked how well they were able to understand information that CityBus provides. Almost 90% of respondents stated they were able to get the information they needed all the time or most of the time.

Riders also indicated their preferred information source for service changes and how they plan their trip. Similar to the last plan update most respondents got most of their information from either bus operators or the customer service staff at the Transit Mall.

In the last year CityBus has been encouraging riders to use the Transit App for real-time information and trip planning. It was the preferred tool of respondents for this purpose showing the messaging is working and that riders find the app useful.

Respondents were ask to provide free form feedback on what CityBus can do to better provide information. May of the comments were positive and stated that material was easily accessible and properly translated.

Factor 3: The Importance of your programs, activities, and services to LEP persons

Task 3 - Step 1: Identify your agency's most critical services

Critical services are defined by the DOT guidance as programs or activities that have serious consequences for individuals if language barriers prevent a person from benefiting from the activity. Serious consequences could include the inability

of an LEP individual to effectively utilize public transportation to obtain health care, education, or access employment. Critical services provided by the Transit Division include:

- CityBus route and schedule information
- Fare media information
- System rules (Code of Conduct)
- Information on how to ride the system
- Rider Alerts regarding detours and bus delays
- Safety and security announcements
- Communication related to transit planning and service changes
- Information on ADA Paratransit services
- Non-discrimination (Title VI) policy

Task 3 - Step 2: Review input from community organizations and LEP persons

The Transit Division's communication with community organizations and LEP persons clearly identifies the importance of fixed-route transit services to LEP individuals, as well as the importance of the range of language assistance in Spanish already provided by the Transit Division.

Factor 4: The resources available to the recipient and costs

Task 4 - Step 1: Inventory language assistance measures currently being provided, along with associated costs

Santa Rosa CityBus provides the following language assistance measures to date:

- The City of Santa Rosa contracts with Language Solutions Incorporated, which is a translation service that allows staff and customers to speak with a live translator over the telephone. The service offers translation in over 150 languages.
- Use of pictograms or additional translation related to required actions/behavior onboard vehicles.
- A list of popular destinations and bus routes that serve those destinations to aid with trip planning is available in both English and Spanish.
- A list of all middle and high school campus and bus routes that serve these school to aid with trip planning is available in both English and Spanish.
- A number of CityBus and Santa Rosa Paratransit staff, are proficient in Spanish. CityBus now has two full-time over the phone customer service staff members that are fluent in Spanish as well as two Transit Service Representatives that are fluent.
- All bus stop signs display information in both English and Spanish.
- Regional wayfinding efforts will have Spanish translation and will also harmonize coloring and icons across all Bay Area transit services.
- On board pre-recorded messages announcing stops are in both English and Spanish.
- Route information that can be accessed through the automated phone system is recorded in both English and Spanish.
- All information on system maps and schedules is both English and Spanish. This includes information about fares, holidays, how to contact staff, and trip planning information.
- All customer information brochures (e.g., Learn to Ride CityBus, Fare Policy) and Rider Alerts are printed in both English and Spanish.
- All social media posts and email news blasts communications and issued in both English and Spanish
- The Paratransit Users Guide is available in both English and Spanish.
- Information on promotional events is printed in English and Spanish.
- Car cards that include fare information and the Title VI non-discrimination policy are printed in English and Spanish and displayed continuously inside buses
- Stickers displaying fare information on buses are provided in both English and Spanish
- Information about filing a Title VI complaint is provided in both English and Spanish.
- Public notices of meetings and service changes are printed in both English and

Spanish.

- Important, time-sensitive information, including Public Service Announcements, are issued in both English and Spanish
- Interpretation is provided for Spanish-speakers at public meetings and workshops.
- All information on the CityBus website SRCityBus.org, including transit and paratransit information, can be translated into numerous languages by clicking a prominently displayed button found at the top of the webpage.
- Apps riders can use for trip planning translate into the user's native phone language.

Task 4 - Step 2: Determine what, if any, additional services are need

According to the most recent Census data, the largest LEP population in the Santa Rosa CityBus service area is Spanish-speaking. The next largest group (1,045) is Vietnamese speakers. These populations are within the "Safe Harbor" threshold (5% of the service area population or 1,000 individuals, whichever is less).

Given the findings of this analysis, CityBus will need to consider how it will translate material into Vietnamese. Due to the small population size it is unlikely that all 1,045 individuals ride CityBus. CityBus plans to add language to all its vital documents in Vietnamese indicating that we will translate all documentation into Vietnamese upon request. We will also inform speakers in Vietnamese that language interpretation and translation is available through our customer service staff.

The following is a list of language assistance measures staff plans to investigate or implement based on this outreach and analysis:

- Develop material to better understand and use technology to plan trips and receive service information. This specifically includes a push to use app based technology that can provide information to the user in the language they have set natively to their phone.
- Review all translated materials to ensure the information is presented in language that is simplified and accessible to readers of various levels of formal education. This is inclusive of the verbiage informing individuals that Vietnamese is available upon request.
- Training for staff in the basics of communicating with Spanish-speakers.
- Additional bus schedule information at key bus stops.
- Posting or distributing of targeted transit information at stores that are popular with Spanish speakers.
- Further education of the public as well as staff of community organizations and social services agencies about availability of language assistance.
- Provide more printed material to inform riders of service changes.
- Use Spanish language radio to send out information.
- Post more material at community gathering locations.

Task 4 - Step 3: Analyze your budget

The current budget allows for Santa Rosa CityBus to continue with all current efforts to provide language assistance to all users of the fixed route and ADA paratransit services. Additional funds are available to expand translation, specifically into Vietnamese where needed. The language assistances measures listed in Task 4 - Step 2 are also feasible in the current budget.

Task 4 - Step 4: Consider cost-effective practices for providing language assistance

Cost-effective practices for providing language services that the Transit Division has pursued or may pursue include:

- Continue the practice of including both English and Spanish information on all printed materials, rather than printing separate pieces in each language.
- Target social media posts to reach Spanish speakers within Santa Rosa and neighboring communities.
- Partnering with community organizations to assist with translation or interpretation.
- Partnering with community organizations to assist with distribution of printed information to LEP individuals, or to provide educational or outreach opportunities to LEP individuals.

- Working with other City departments in their efforts to create a more inclusive community.
- Investigating incorporating the use of translation apps for frontline staff interactions with customers.

Staff also believes the measures identified in Task 4, Step 2, are highly cost-effective measures for improving the access of LEP individuals to Santa Rosa CityBus and Santa Rosa Paratransit services.

IV. Providing Notice to LEP Persons Regarding the Availability of Language Assistance

CityBus has posted notices informing riders and other members of the public of the availability of free language assistance and how to access it. The notice is provided in English and Spanish. CityBus will add Vietnamese to these posts. This information is posted at the following locations:

- Inside buses (car cards)
- Transit Operations Building
- Downtown Transit Mall
- Major transfer hubs
- CityBus website

The notice is provided to all Transit Division and staff, as well as staff of the paratransit contractor. The notice will be distributed during community outreach activities and forwarded to community partners who work with LEP individuals.

As part of monitoring this Language Assistance Plan, the Transit Division will periodically review whether this notice should be provided in additional languages.

V. Staff Training

The Transit Division will deliver an annual training for front line staff that will include:

- A summary of the Transit Division's responsibilities under the DOT LEP Guidance,
- A summary of the Language Assistance Plan,
- A description of the type of language assistance offered by the Transit Division and instructions for accessing these services, and
- Strategies for working effectively with Limited English Proficient individuals and Spanish-speaking LEP individuals in particular.

Front line staff include:

- Bus operators
- Field Supervisors
- Customer Service Staff
- Transit Service Representatives
- Paratransit Supervisors
- Transit Superintendent
- Transit Planners
- Paratransit Operators
- Paratransit Customer Service Staff

In developing the training, the Transit Division may make use of the training resources identified in the DOT LEP Guidance. Training for paratransit front line staff be delivered in coordination with the paratransit contractor.

VI. Monitoring, Updating, and Evaluating the Language Assistance Plan

At a minimum, the Language Assistance Plan will be evaluated and updated every three years to coincide with submittal of the CityBus Title VI Program to the Federal Transit Administration. In the interim, monitoring activities may identify changes that should be made to the Language Assistance Plan. Monitoring activities will include evaluation of the following information:

- Needs identified by front line staff during employee training activities related to Limited English Proficiency or in the course of day-to-day operations of the system;
- Needs identified by community partners or LEP individuals during outreach activities or other engagement with staff;
- Changes to City policy that affect the dissemination of information in languages other than English to the public and;
- New data related to LEP populations in the CityBus service area.

Appendix E

Systemwide Service Standards and Policies

Santa Rosa CityBus

Title VI Systemwide Service Standards and Policies

I. Introduction

This attachment provides Santa Rosa CityBus standards and policies related to the four quantitative indicators and two procedures required by the Federal Transit Administration (FTA) for inclusion in each fixed-route transit operator's Title VI Program. The four indicators for which quantitative standards are required include: 1) vehicle load, 2) vehicle headway, 3) on-time performance, and 4) service availability. In addition, operators must adopt qualitative policies addressing the following procedures: 1) vehicle assignment, and 2) distribution of transit amenities.

The full set of adopted service standards and policies for Santa Rosa CityBus are available in the FY 2016-25 CityBus Short-Range Transit Plan, which may be accessed at: https://srcitybus.org/short-range-transit-plan/.

II. Service Standards

A. **Vehicle Load:** Vehicle loads shall not exceed 1.5 in peak periods and 1.0 in off-peak periods on a continual basis, with the exception of specific trips at school bell times. (Note: The vehicle load standard is expressed as a ratio of passengers to the number of seats available on a particular vehicle.)

B. **Vehicle Headway:** The Phase I and II service plans resulting from the 2015-17 Reimagining CityBus project were developed using "route types" adopted by the Santa Rosa City Council in August 2015 as part of a set of Service Design Guidelines used to guide service planning. Standards for vehicle headways have been adjusted to reflect these route types and the role that different types of service play in the new CityBus network. These standards were developed with significant public input and review through the Reimagining CityBus Short-Range Transit Plan processes. These route types include:

- Rapid Bus: A specialized service for the busiest segments of high-demand corridors that features direct route alignments and limited stops. CityBus does not currently operate Rapid Bus service but may pursue development of rapid bus service as part of Reimagining CityBus Phase II. *Headway: 15 minutes or less*

- Trunk Routes: The core routes in the system, serving the busiest corridors with direct, frequent service. Trunk routes typically operate 7 days/week and may provide "local" service along rapid bus corridors. *Headway: 15-30 minutes*
- Local Routes: Routes that serve moderate demand areas or corridors with service that may run as frequently as trunk routes, or less often. Local routes may incorporate productivity and coverage-oriented segments within the same route, and are designed to connect with transfer hubs, trunk routes, and rapid bus corridors. *Headway: 30-60 minutes*
- Circulators/"Flexible" Services: Services that primarily exist to provide coverage in areas with lower transit demand, and to connect residential neighborhoods to transfer hubs and local/trunk/rapid routes. They may take the form of fixed-routes, deviated fixed-routes, or other coverage-oriented transit service models. *Headway: 60 minutes or more*

C. **On-time Performance:** At least 90% of trips will arrive within 5 minutes after the scheduled time.

D. **Service Availability:** 90% of transit-supportive areas within the City of Santa Rosa will be within ¼ mile of a bus stop. Transit-supportive areas are defined as areas with continuous densities (i.e., as opposed to "leapfrog" development) with minimum household density of 3 households/gross acre or 4 jobs/gross acre. Some areas may achieve these thresholds but feature street networks or other features that preclude transit operations, or be served by other transit operators at levels approximately what CityBus would provide. This service availability standard was also developed with significant public input and review through the Reimagining CityBus and Short-Range Transit Plan processes and is subject to regular review when major service changes are considered to ensure this standard is preserved.

III. Service Policies

A. **Vehicle Assignment:** CityBus fleet composition is identified and maintained in accordance with the *System Safety Program Plan*, taking such factors as ridership levels and operating conditions into account. Based on this evaluation, CityBus operates mostly 40' transit buses with a 30' cutaway vehicle serving one route that cannot be served by a 40' bus due to a steep inclined access to a major senior housing facility. These route is a lower-ridership, coverage-based route and passenger overloading on a smaller bus is not a concern based on low ridership levels.

Forty-foot vehicles are randomly assigned to the remaining vehicle blocks each day, ensuring that older and newer vehicles are rotated across all routes and neighborhoods. In addition, because the CityBus system is heavily interlined, with vehicles serving several different routes over the course of the service day, vehicles are heavily rotated throughout the city over the course of the service day. In this way CityBus ensures that discrimination does not occur through the vehicle assignment process.

B. **Transit Amenities:** CityBus ensures that discrimination does not occur in the process of installing and maintaining new bus stop amenities by following adopted guidelines that prioritize locations based on empirical data related to transit service ridership levels and demand, subject to constraint related to safety and ADA compliance. Specifically, the *City of Santa Rosa Design Guidelines* specify that:

- Bus shelter(s) and bench(es) should be provided at stops where 50 passengers or more per day are expected to board buses
- Bus bench(es) should be provided at stops where 30 passengers or more per day are expected to board buses
- Developments that should provide bus shelter(s) and/or bench(es) include shopping centers, office buildings, hospitals, schools, large apartment complexes, and major residential subdivisions (200 or more dwelling units, or contains 100 acres or more of land).

New bus stop amenities provided by the City of Santa Rosa and private developers are distributed according to the *City of Santa Rosa Design Guidelines*, with the caveat that installation of bus stop amenities is subject to space and other constraints at the bus stop location, including the need to maintain an ADA-compliant landing pad and path of travel. Future improvements to bus stops are additionally guided by a bus stop audit documenting compliance with ADA requirements, as well as other conditions and amenities, at all bus stops throughout the system. A transition plan has been developed to prioritize improvements. The Transit Division reviews all applications by private developers and identifies improvements to be required through the entitlement process based on these guidelines to ensure an equitable distribution of developer-provided amenities.

Free-standing waste receptacles are installed based on the number of passenger boardings at a particular stop, the level of activity in the area, and the availability of other trash receptacles nearby. Installation of pole-mounted waste receptacles may additionally require identification of an adjacent property owner who agrees to regularly empty the receptacle.

Printed information, including system/route maps and schedule information, is available on every CityBus vehicle and is provided at the Transit Mall, Coddingtown Transfer Hub, and Westside Transfer Center. All bus stops in the CityBus system are identified by a standard CityBus bus stop sign.

Provision of digital information such as real-time transit information signage will be prioritized for major activity centers in the CityBus system such as transit hubs and high-ridership bus stops.