

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

**Santa Rosa CityBus Title VI Program**

*Revised March 2019*

**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 in English and Spanish on the Transit Division website, in public areas of the Transit Division offices 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. 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 February 2016), the Transit Division has received three complaints alleging discrimination based on race, color, or national origin. All of these complaints were investigated in accordance with the Transit Division’s adopted procedures for investigating, tracking, and responding to Title VI complaints.

Date	Summary	Status/Actions Taken
August 8, 2017	Complainant felt she was denied the opportunity to alight at an out-of-service bus stop, while a white couple was allowed to do so.	Investigation conducted by Transit Division staff using onboard video and bus operator interview. The investigation found that this complaint resulted from a misunderstanding between the passenger and bus operator related to a bus stop that was in the process of being relocated. There was no finding of discrimination. A letter was sent to the complainant and the complaint was closed.
August 24, 2017	Complainant witnessed an incident between an African-American passenger and a bus operator and felt that the operator would not have responded to a white person in the same way.	Investigation conducted by Human Resources and Transportation and Public Works/Transit staff, using onboard video and interviews with the complainant and bus operator. While it was found that the bus operator violated CityBus Standard Rules and Operating Procedures, and appropriate disciplinary action was taken, there was no finding of discrimination. A letter was sent to the complainant and the complaint was closed.
April 18, 2018	Complainant felt that her sister was the subject of discrimination on the part of a bus operator during a dispute over an expired transfer.	Investigation conducted by Transit Division staff using onboard video and bus operator interview. The investigation found that the bus operator followed standard procedures for an expired transfer. There was no finding of discrimination. A letter was sent to the complainant and the complaint was closed.

## **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 is provided in Appendix C.

Since February 2016, the Transit Division has conducted the following outreach activities:

- Open houses/workshops/meetings for receiving rider input and feedback on proposed served changes at various locations in the community, including senior housing facilities, community centers and City Hall. Meetings were held at different times of day, and at locations throughout the city that are easily reachable by transit. Meetings were widely advertised in English and Spanish, with notification given of the availability of oral interpretation at all meetings. Meetings were advertised with rider alerts on all buses and at major transit hubs, as well as through the Transit Division's email alert, stakeholder mailing list, and social media.
- Direct outreach to riders regarding planned service changes at the Transit Mall, Coddington transfer center, Santa Rosa Junior College, and Santa Rosa high schools and middle schools
- Webinar posted on YouTube to provide an overview of proposed service changes for individuals unable to attend public meetings
- Train-the-Trainers workshop for planned service changes with staff of human services organizations service large numbers of transit riders
- Regular updates provided to the community during the "Reimagining CityBus" process via social media, community partners such as Latino Service Providers, and the Transit Division's stakeholder mailing list, which includes a wide array of community and social services organizations, City of Santa Rosa Community Advisory Board members, contacts for neighborhood organizations throughout Santa Rosa, and interested individuals, including participants in outreach meetings.
- Presentations given to community partners such as the Santa Rosa Junior College Sustainability Committee, Sonoma County Transportation and Land Use Coalition, Sonoma Access consortium, and others.
- Online and print surveys (bilingual) to receive rider feedback on proposed service changes

- Survey of riders with Limited English Proficiency
- Paratransit User Group meetings (several meetings/year)
- Travel training classes serving individuals at organizations and schools throughout the city.
- Participation in community events:
  - CHOPS Youth Empowerment Conference and annual Open House
  - Santa Rosa Earth Day Festival
  - Senior Expo of Santa Rosa
  - Santa Rosa Junior College Day Under the Oaks and Welcome events
  - Roseland Cinco de Mayo
  - Disability Services and Legal Center Tech Expo

## **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, and Executive Order 13166 (“Improving Access to Services for People with Limited English Proficiency”, dated August 11, 2000), 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 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 February 2016.

## **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.srcity.org/transit](http://www.srcity.org/transit)).

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.srcity.org/transit](http://www.srcity.org/transit), or you may call Customer Service at (707) 543-3333 and ask for the form to be mailed 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, e-mail 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

The Risk Manager 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 from the Risk Manager, 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 following offices:

**U.S. DEPARTMENT OF TRANSPORTATION**

Departmental Director of Civil Rights  
Office of the Secretary  
U.S. Department of Transportation  
External Civil Rights Programs Division (S-33)  
1200 New Jersey Ave., S.E.  
Washington, D.C. 20590  
Tel: (202) 366-4070  
TTY: (202) 366-9696  
Fax: (202) 366-5575

**FEDERAL TRANSIT ADMINISTRATION**

Office of Civil Rights  
Federal Transit Administration  
90 7<sup>th</sup> Street, Ste. 15-300  
San Francisco, CA 94103  
Tel: (415) 734-9490  
  
Office of Civil Rights-Title VI Coordinator  
Federal Transit Administration  
East Building, 5th Floor - TCR  
1200 New Jersey Ave., S.E.  
Washington, D.C. 20590

## **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 or you may call Customer Service at (707) 543-3333 and ask for a Title VI Complaint Form to be mailed 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., Room 1  
Santa Rosa, CA 95404  
Phone: (707) 543-3024

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  
Fax: (707) 543-3030

Federal Transit Administration (Region IX)  
Office of Civil Rights  
90 7<sup>th</sup> Street, Ste. 15-300  
San Francisco, California 94103

U.S. Department of Transportation  
Departmental Office of Civil Rights  
1200 New Jersey Ave., S.E.  
Washington, D.C. 20590

Federal Transit Administration  
Attn: Complaint Team  
East Building, 5<sup>th</sup> Floor - TCR  
1200 New Jersey Ave., S.E.  
Washington, D.C. 20590

## 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, Room 1, 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.

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## Santa Rosa CityBus Title VI Complaint Form

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Names and contact information for witnesses:

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**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

<b><i>For City of Santa Rosa Use Only</i></b>	
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 2019*

**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, Executive Order 13166 on access for individuals with Limited English Proficiency, 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 (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. 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, Executive Order 13166 on Limited English Proficiency, 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, 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) 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 and by Comment Card. In addition, comments may be submitted over the phone to Transit Division representatives, via 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**

# Language Assistance Plan

March 2019

## I. Introduction

This Language Assistance Plan is one component of the City of Santa Rosa Transit Division's efforts to provide an appropriate mix of language assistance measures to 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 limited ability to read, write, speak, or understand English. The plan includes demographic analysis, a survey of Santa Rosa CityBus and Santa Rosa Paratransit staff, input from staff of community organizations serving LEP individuals, and feedback from LEP individuals themselves. Also included is a summary of language assistance measures currently provided by the Santa Rosa Transit Division and additional measures proposed for the future.

## II. Background

Title VI of the Civil Rights Act of 1964 provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from 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. Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," directs each federal agency to examine the services it provides and implement a system by which LEP persons can meaningfully access those services, and to publish guidance for their respective funding recipients to assist them in meeting their obligations to LEP persons under Title VI.

The City of Santa Rosa's Transit Division has prepared this plan using 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).

The City of Santa Rosa Transit Division is grateful for the support provided by the community organizations that contributed information about their LEP clients by completing our survey, as well all individuals who regularly ride CityBus and Santa Rosa Paratransit and completed an online survey telling us about their experience using these services.

## IV. 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 January and February 2019 to gauge prior experience with LEP individuals. The number of responses received for each job category is displayed in Table 1.

*Table 1: Job category of staff who completed the survey*

CityBus Staff		Paratransit Staff	
CityBus Operator	38	Paratransit Operator	8
CityBus Transit Services Rep.	3	Paratransit Customer Service	5
CityBus Field Supervisor	4	Paratransit Supervisor	3
CityBus Manager	4		
CityBus Admin. Secretary	1		
CityBus Transit Planner	1		
<b>TOTAL</b>	<b>51</b>	<b>TOTAL</b>	<b>16</b>

Staff was asked how often they interact with LEP individuals in an average week. As shown in Table 2, CityBus operators and Transit Service Representatives (TSR) assisting passengers in the downtown Transit Mall had the highest number of interactions with the LEP individuals in an average week.

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

CityBus Staff	Interaction with LEP people per week				
	0-5	6-20	20-40	40+	No response
CityBus Operator	7	16	6	8	1
CityBus Transit Services Rep.				3	
CityBus Field Supervisor	3		1		
CityBus Manager	4				
CityBus Admin. Secretary	1				
CityBus Transit Planner	1				
<b>TOTAL</b>	<b>16</b>	<b>16</b>	<b>7</b>	<b>11</b>	<b>1</b>



Paratransit Staff	Interaction with LEP people per week				
	0-5	6-20	20-40	40+	No response
Paratransit Operator	6	2			
Paratransit Customer Service	2	2	1		
Paratransit Supervisor	2	1			
<b>TOTAL</b>	<b>10</b>	<b>5</b>	<b>1</b>	<b>0</b>	<b>0</b>

Staff reported how successful they were in communicating with LEP individuals (Table 3). For the combined staff of CityBus and Santa Rosa Paratransit, 55% felt they were able to effectively communicate “most or all of the time”, while 27% reported successful communication “some of the time”, and 7% felt that they were most often unable to communicate effectively with LEP individuals.

*Table 3: Staff’s ability to communicate with LEP individuals*

CityBus Staff	Ability to Communicate Effectively			
	Most of the time	Some of the time	Not very often	No response
CityBus Operator	21	9	3	5
CityBus Transit Services Rep.	3			
CityBus Field Supervisor	1	2		1
CityBus Manager	2	2		
CityBus Admin. Secretary	1			
CityBus Transit Planner	1			
<b>TOTAL</b>	<b>29</b>	<b>13</b>	<b>3</b>	<b>6</b>

Paratransit Staff	Ability to Communicate Effectively			
	Most of the time	Some of the time	Not very often	No response
Paratransit Operator	4	2	1	1
Paratransit Customer Service	3	2		
Paratransit Supervisor	1	1	1	
<b>TOTAL</b>	<b>8</b>	<b>5</b>	<b>2</b>	<b>1</b>

BOTH SERVICES	Ability to Communicate Effectively			
	Most of the time	Some of the time	Not very often	No response
<b>TOTAL</b>	<b>37</b>	<b>18</b>	<b>5</b>	<b>7</b>
<b>PERCENTAGE OF TOTAL</b>	<b>55%</b>	<b>27%</b>	<b>7%</b>	<b>10%</b>

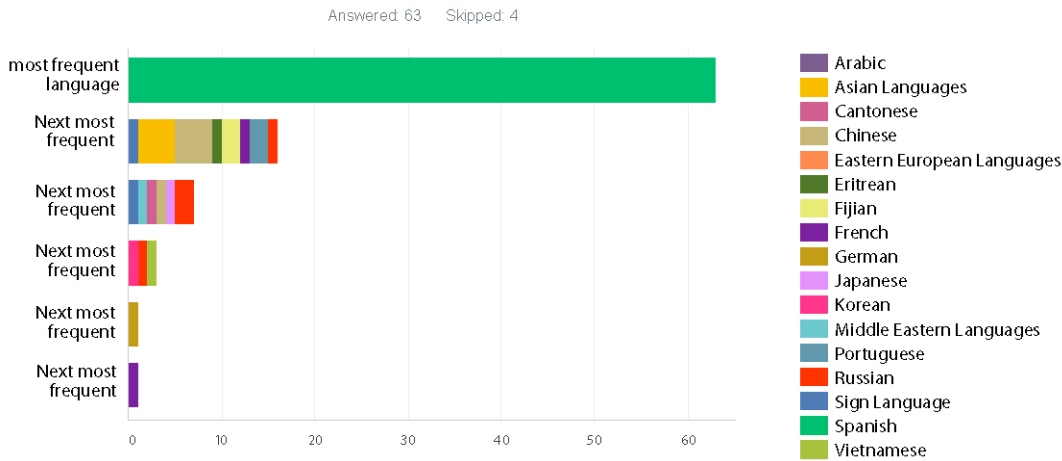
According to staff surveyed, the most common questions asked by LEP individuals are:

- Which bus should I take to [specific location]?
- What time does the bus come?
- How much is the fare?
- How do I make my connection/transfer?

The languages other than English staff reported encountering include Spanish, Cantonese, Chinese, Eritrean, Fijian, French, German, Japanese, Korean, Portuguese, Russian and Vietnamese. Spanish was reported as the most frequently encountered language at 69%, followed by Chinese at 5%.

**Table 4: Languages other than English that staff encounter during the course of work**

What languages (other than English) do you typically encounter when dealing with the public?  
*(list in order of most frequent to least frequent language encountered)*



**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’ service area is defined by the city limits of Santa Rosa, including the Oakmont senior community in southeastern Santa Rosa. CityBus also serves smaller unincorporated “islands” within the Santa Rosa city limits. 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**

Data was obtained from the American Community Survey – U.S. Census Bureau Releases 2013-2017 ACS 5-Year Estimates. These data are presented and analyzed below.

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

Table 5 provides the breakdown of the top fifteen languages spoken in the CityBus service area. The most significant non-English language populations speak Spanish, Chinese and Tagalog.

*Table 5: Top Fifteen Languages Spoken in Santa Rosa, 2013-2017*

Language Spoken	Estimate
Speak only English	121,039
Spanish	46,489
Chinese (incl. Mandarin, Cantonese)	1,425
Tagalog (incl. Filipino)	1,345
Ilocano, Samoan, Hawaiian, or other Austronesian languages	817
Vietnamese	796
Thai, Lao, or other Tai-Kadai languages	703
Khmer	589
Amharic, Somali, or other Afro-Asiatic languages	567
French (incl. Cajun)	559
Swahili or other languages of Central, Eastern, and Southern Africa	522
German	521
Korean	474
Italian	405
Persian (incl. Farsi, Dari)	356

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates (Table B16001 Language Spoken at Home by Ability to Speak English for Population 5 Years and Older)

Table 6 displays the number of residents of the Santa Rosa CityBus service area who spoke English “less than very well” in 2013-2017. The total population five years and older in Santa Rosa was 180,047. Of that number, 27,266 (15% of the population) spoke English “less than very well”. Over 81% of the residents speaking English “less than very well” were Spanish-speakers (22,311 residents). After Spanish, the languages with the largest number of limited English proficient individuals were Chinese (804), Vietnamese (519), and Thai-Lao speakers (503).

*Table 6: Residents Five Years and Older Speaking English “less than Very Well”, 2013-2017*

Languages Spoken	Estimate
Total All Languages	180,047
Speak only English	121,039
Spanish	46,489
Speak English less than "very well"	22,311
French (incl. Cajun)	559
Speak English less than "very well"	45
Italian	405
Speak English less than "very well"	10
Portuguese	350
Speak English less than "very well"	31
German	521
Speak English less than "very well"	30
Yiddish, Pennsylvania Dutch or other West Germanic languages	118
Speak English less than "very well"	0
Greek	49
Speak English less than "very well"	6
Russian	301

Speak English less than "very well"	110
Polish	37
Speak English less than "very well"	18
Serbo-Croatian	153
Speak English less than "very well"	43
Armenian	83
Speak English less than "very well"	8
Persian (incl. Farsi, Dari)	356
Speak English less than "very well"	167
Gujarati	74
Speak English less than "very well"	22
Hindi	156
Speak English less than "very well"	62
Urdu	101
Speak English less than "very well"	86
Punjabi	198
Speak English less than "very well"	82
Bengali	66
Speak English less than "very well"	58
Nepali, Marathi, or other Indic languages	295
Speak English less than "very well"	237
Other Indo-European languages	305
Speak English less than "very well"	128
Telugu	19
Speak English less than "very well"	10
Tamil	149
Speak English less than "very well"	67
Malayalam, Kannada, or other Dravidian languages	35
Speak English less than "very well"	0
Chinese (incl. Mandarin, Cantonese)	1,425
Speak English less than "very well"	804
Japanese	239
Speak English less than "very well"	48
Korean	474
Speak English less than "very well"	195
Hmong	0
Speak English less than "very well"	0
Vietnamese	796
Speak English less than "very well"	519
Khmer	589
Speak English less than "very well"	389
Thai, Lao, or other Tai-Kadai languages	703
Speak English less than "very well"	503
Other languages of Asia	209
Speak English less than "very well"	99
Tagalog (incl. Filipino)	1,345
Speak English less than "very well"	422
Ilocano, Samoan, Hawaiian, or other Austronesian languages	817
Speak English less than "very well"	190
Arabic	202

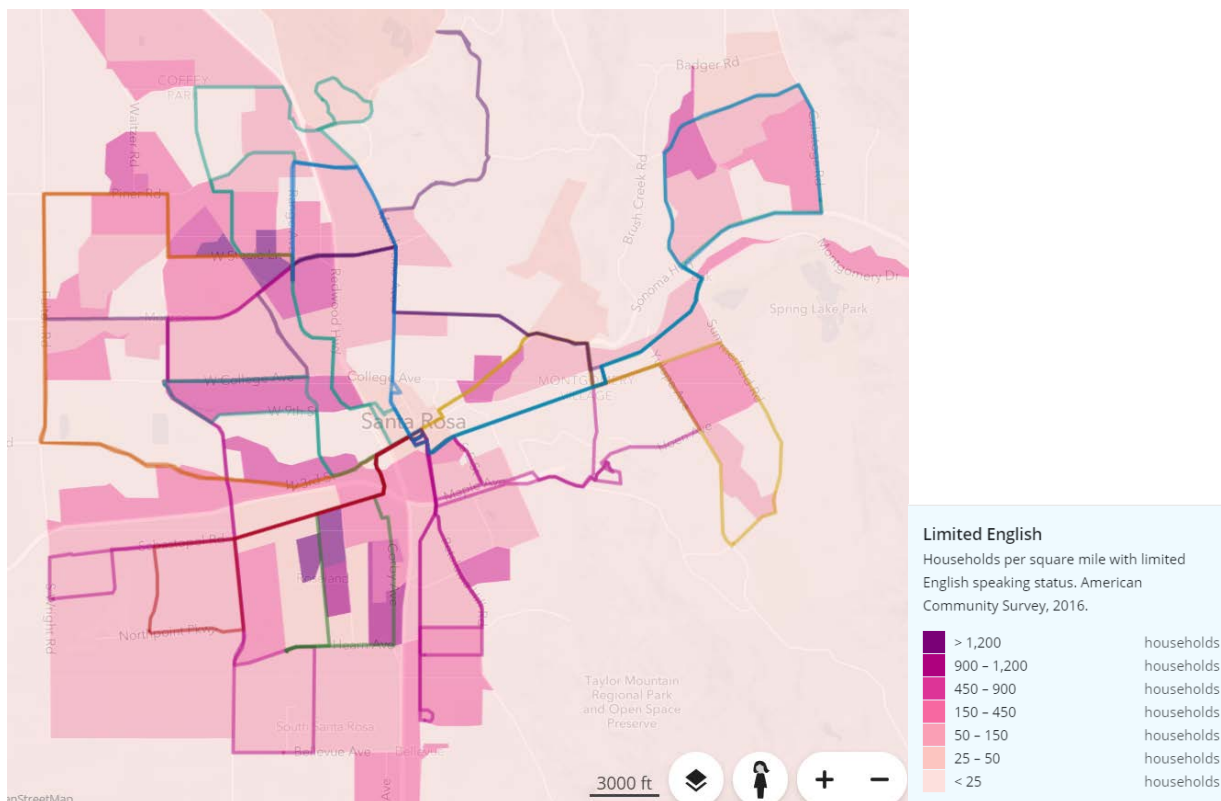
Speak English less than "very well"	57
Hebrew	86
Speak English less than "very well"	0
Amharic, Somali, or other Afro-Asiatic languages	567
Speak English less than "very well"	236
Yoruba, Twi, Igbo, or other languages of Western Africa	176
Speak English less than "very well"	74
Swahili or other languages of Central, Eastern, and Southern Africa	522
Speak English less than "very well"	189
Navajo	10
Speak English less than "very well"	0
Other and unspecified languages	29
Speak English less than "very well"	10

Source; Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates (Table B16001 Language Spoken at Home by Ability to Speak English 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 block group. The areas with the highest concentrations of household with limited English speaking status are found west of Highway 101, particularly in the Roseland neighborhood of southwestern Santa Rosa (along West Avenue and Corby Avenue), the West College/West Ninth neighborhood, and the Coddington/West Steele Lane area.

Figure 1: Areas with High Concentrations of LEP Individuals, Santa Rosa, 2016



Source: American Community Survey 2016

Last Update: March 2019

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

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Data from the California Department of Education were analyzed to identify the languages spoken by English Learners in Santa Rosa schools. Table 7 presents the number of English Learners in Santa Rosa schools, by language spoken. Of the 7,246 students who were English Learners in 2017-2018, over 93% were Spanish speakers.

Data from the U.S. Department of Labor and the National Center for Education were also reviewed. These data consisted of statistics for Sonoma County as a whole, with no break-out of data at the municipal level. For this reason, these data were not useful for identifying characteristics of the LEP population within the CityBus service area.

*Table 7: English Learners in Santa Rosa Schools by Language Spoken, 2017-2018*

Language	Number of English Learners
Spanish	6709
Other non-English languages	88
Vietnamese	77
French	50
Khmer (Cambodian)	46
Mandarin (Putonghua)	44
Filipino (Pilipino or Tagalog)	29
Tigrinya	28
Punjabi	25
Lao	22
Korean	19
Hindi	14
Russian	11
Arabic	10
Japanese	10
Urdu	10
Cantonese	8
Portuguese	7
Samoan	5
Farsi (Persian)	4
Burmese	3
German	3
Hmong	3
Pashto	3
Thai	3
Cebuano (Visayan)	2
Tamil	2
Armenian	1
Bengali	1
Dutch	1
Gujarati	1
Hungarian	1
Ilocano	1

Indonesian	1
Italian	1
Taiwanese	1
Telugu	1
Tongan	1

Source: California Department of Education, Educational Demographics Office

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

### Task 1 - Step 4A: Identify community organizations

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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 City staff, social service agency staff, and community members with knowledge of organizations serving LEP individuals in Santa Rosa.

### Task 1 - Step 4B: Contact relevant community organizations

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Organizations and agencies contacted were prioritized based on their apparent level of involvement with LEP individuals. Staff were contacted via email and asked to complete a short online survey. Six community organizations and social service agencies completed the survey

- Redwood Empire Food Bank
- The Living Room
- Child Parent Institute
- YWCA Sonoma County
- Community Support Network
- Vía Esperanza Centro de Educación

### Task 1 - Step 4C: Obtain information

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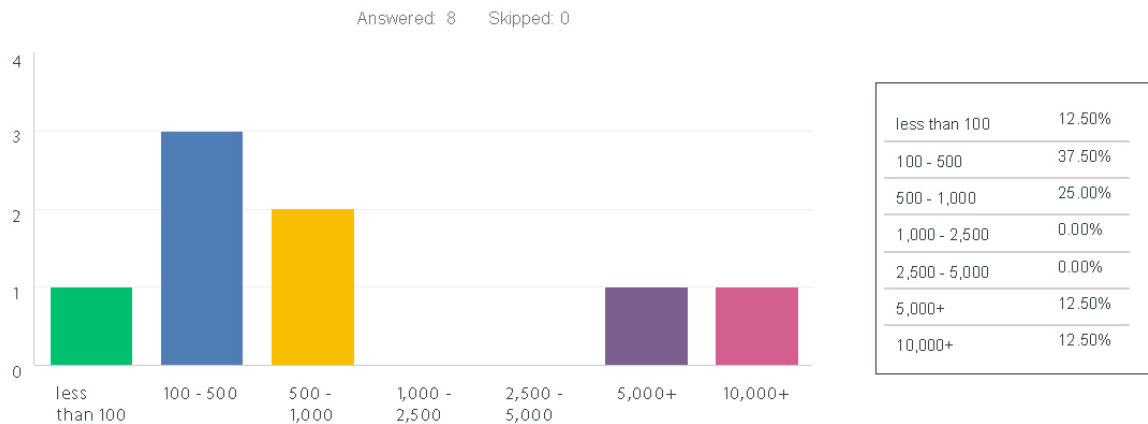
Through a survey of community organizations and social service agencies, information was collected on the size of the population served, the transportation needs of the client population, demographic trends among the population, and effective ways to obtain input from the population.

#### Client Population Characteristics

The organizations surveyed were quite diverse, with client populations ranging from less 100 to over 10,000 per year. Some reported serving the entire Sonoma County area, others reported serving surrounding counties as well. For this reason, information regarding transit and transportation needs was not limited to CityBus services within Santa Rosa.

**Table 8: Number of clients served by community agencies that were surveyed**

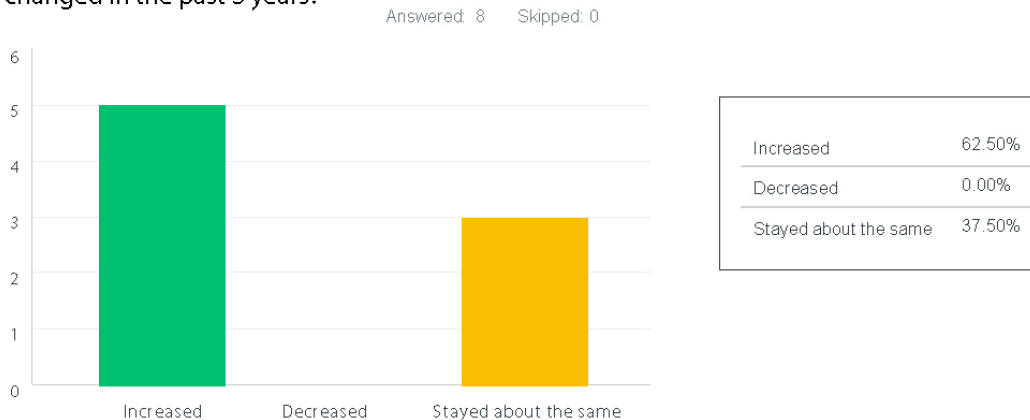
How many clients with limited English proficiency does your agency serve annually?



Of the community agencies surveyed, 62.5% reported an increase in their LEP client population over the past 5 years, while 37.5% reported no change in the volume of LEP clients, and no agencies reported a decrease.

**Table 9: Change in the size of community agencies' LEP client population over the past 5-years**

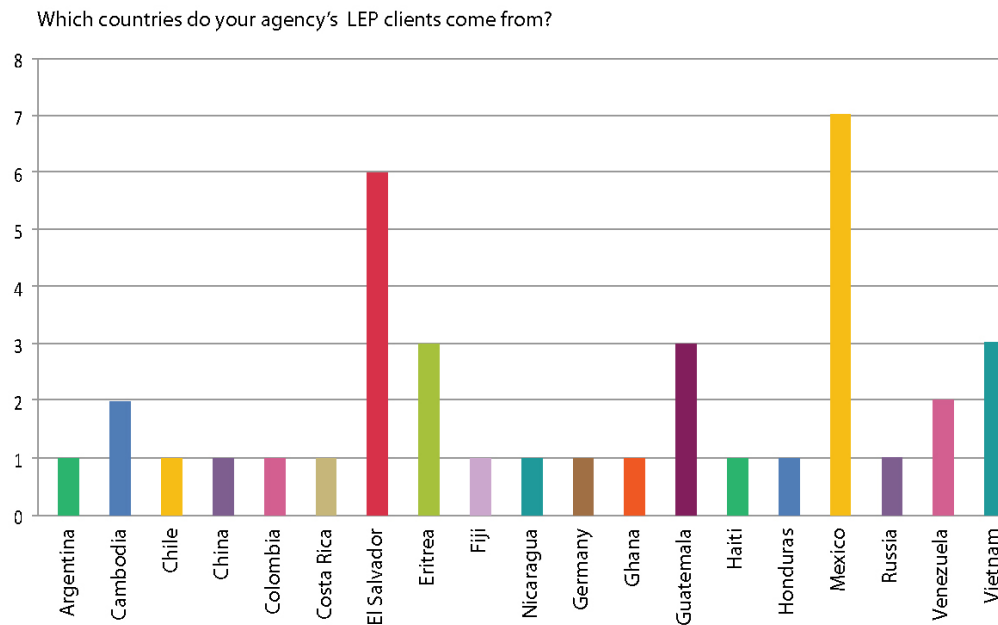
How has the number of clients with limited English proficiency that your agency serves changed in the past 5 years?



The LEP individuals these agencies serve represent immigrants from Latin American, Asia, Eastern Europe, the Caribbean Islands, Africa, South America, and the South Pacific Islands—with the largest segment having emigrated from Mexico.

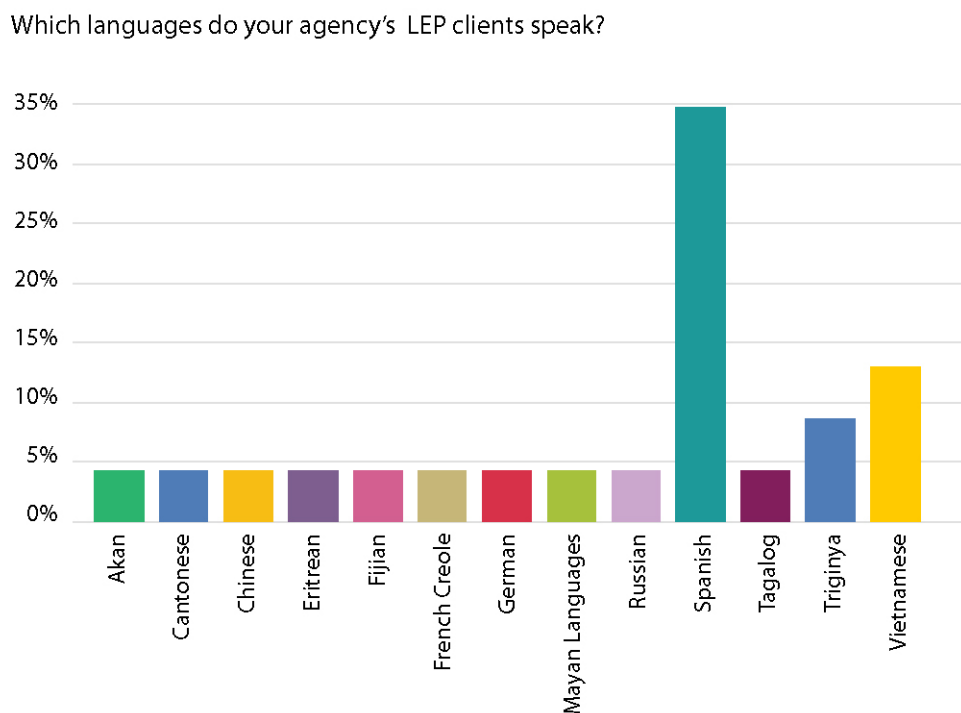


**Table 10: Countries of origin for community service agencies' LEP clients**



The languages that community agencies reported their LEP clients spoke include Spanish, Vietnamese, Triginya, Akan, Cantonese, Chinese, Eritrean, Fijian, French Creole, German Mayan languages, Russian and Tagalog. Spanish was the most frequently reported language at 35% followed by Vietnamese at 13% and Triginya at 9%.

**Table 11: Languages spoken by LEP clients of community service agencies**



## Transportation Needs or Issues

All agency staff stated that their clients ride both CityBus and Santa Rosa Paratransit, with commonly cited destinations including food distribution centers, shopping centers, medical offices, grocery stores, Downtown Santa Rosa, schools including the two junior college campuses within the city limits, MediCal offices, Sonoma County Behavioral Health offices, the Airport Business area and travel to nearby cities. Staff reported clients having difficulty getting to food distributions centers, some county offices, appointments in other counties, the Airport Business area, and the Standish Ave/Todd Road area due to limited bus frequency and route locations.

## Effective Ways to Communicate with Client Population

According to the survey of community agencies, LEP individuals would prefer materials in their native language. Other effective means of communication cited by respondents include translated printed materials aboard the bus and at main transit hubs, better availability of bus maps, social media such as Facebook, radio programs, bilingual drivers and staff to assist with translation.

**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**

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As identified in Task 1, LEP individuals inquire about, use, and are affected by the services CityBus and Santa Rosa Paratransit provide on a daily basis. Operational services include fixed route service and ADA Paratransit. LEP persons also make use of information provided by CityBus customer service staff, Transit Service Representatives, bus operators, field supervisors, maps and schedules, rider alerts via text and email, social media posts and the CityBus website.

### **Task 2 - Step 2: Review information obtained from community organizations**

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As discussed in Task 1, Step 4, staff of community organizations and social service agencies reported that many of their clients use transit for much of their travel. However, in general, respondents did not have detailed knowledge of which routes are most heavily used, or the frequency with which transit services are used.

### **Task 2 - Step 3: Consult directly with LEP persons**

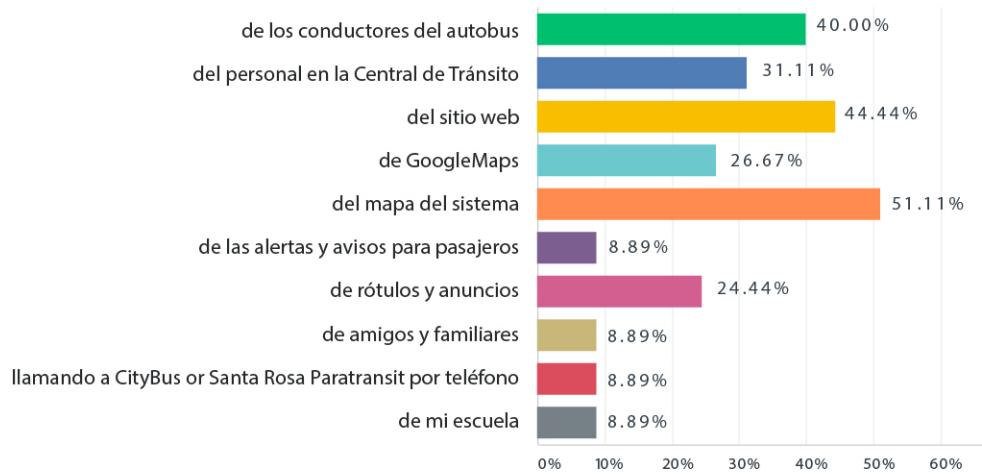
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Information collected through an online survey of 45 Spanish speaking transit riders (64% of which reported that they spoke English “not very well” - see *table 13 below*) included the following:

Survey participants get CityBus information from a wide variety of sources, but the most frequently used sources for transit information were the system map (51%) which has information in both English and Spanish, followed by our website (44%) which can be translated into several languages, and also asking bus drivers and Transit Service Representatives for information (40%). Consulting GoogleMaps and signs posted aboard buses and transit facilities were also cited as frequently used sources for information.

*Table 12: Where Spanish speaking transit riders get transit related information*

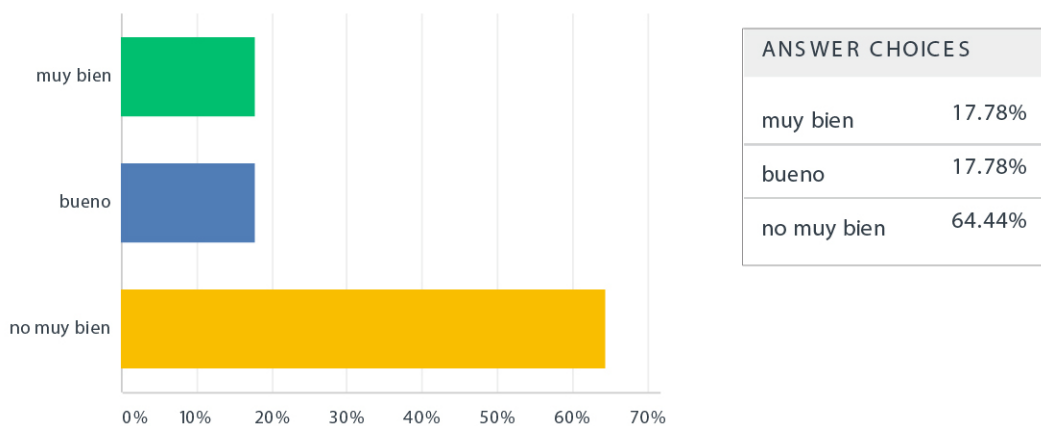
¿Cómo obtienes información sobre CityBus o Santa Rosa Paratransit?



Participants were also asked to rate the ease of obtaining information about CityBus and Santa Rosa Paratransit. 62% reported that obtaining information was “very easy”, 24% reported that it was “somewhat difficult, and 2% reported finding it “very difficult” to obtain transit information. The primary obstacle to communication that Spanish speaking riders reported was the inability to speak English.

*Table 13: Level of English proficiency reported by Spanish speaking transit riders*

¿Qué tan bien hablas ingles?



ANSWER CHOICES	
muy bien	17.78%
bueno	17.78%
no muy bien	64.44%

### Factor 3: The importance to LEP persons of your program, activities, and services

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

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Critical services are defined by the DOT guidance as programs or activities that would 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
- 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

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The Transit Division's communication with community organizations and LEP persons clearly identified 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

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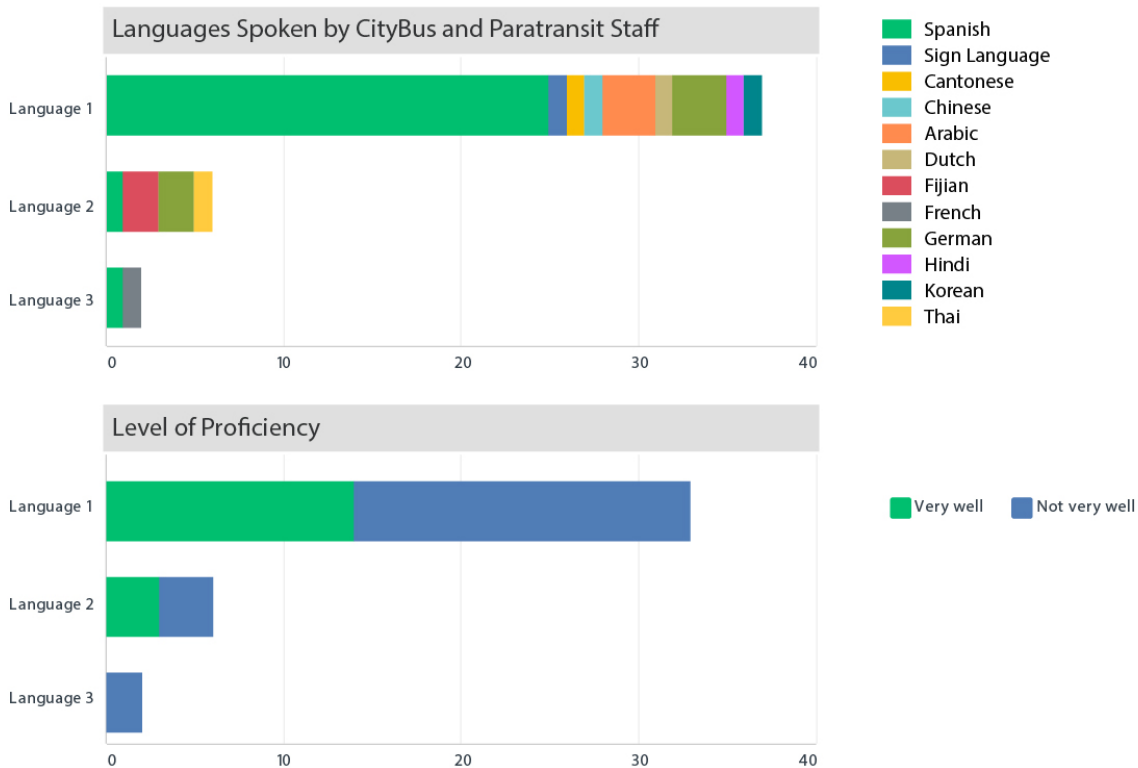
Santa Rosa CityBus provides the following language assistance measures to date

- 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. They including 5 bus operators, 1 marketing and outreach coordinator, 2 Transit Service Representatives (TSR), 2 paratransit operators, and 2 paratransit customer service representatives.
- 55% of CityBus and Paratransit staff are able to communicate in a language other than English, with 41% of these staff having a high level of proficiency in this language. The language staff is most able to speak is Spanish. *(see Table 14 below)*
- All bus stop signs were redesigned in 2017 and display information in both English and Spanish.
- 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 and announced/advertised on local Spanish-language radio stations.
- Interpretation is provided for Spanish-speakers at public meetings and workshops.
- All information on the City's website ([www.srcity.org](http://www.srcity.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.

*Table 14: Languages CityBus and Santa Rosa Paratransit staff are able to speak and their level of proficiency*

Which languages do you speak and what is your level of proficiency?



CityBus has an annual budget of roughly \$75,000 dollars for marketing and outreach. Any marketing and outreach information translated into Spanish is included in this budget.

**Task 4 - Step 2: Determine what, if any, additional services are needed.**

Based on the most recent Census data for the Santa Rosa CityBus service area, by far the largest LEP population in our service area is Spanish-speaking. The next largest groups are the Chinese and Vietnamese-speaking LEP populations, which are of a size that place them below but near the “Safe Harbor” threshold of 5% of the service area population or 1,000 individuals, whichever is less. Given the findings of this analysis, it does not appear that translation of printed information into Chinese or Vietnamese is warranted at this time, given constraints on the operating budget and other language assistance priorities. However, Transit Division staff will continue to evaluate the need to translate additional printed materials into languages other than Spanish in coordination with community partners.

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

- Developing a series of printed FAQ cards in frequently encountered languages to help drivers and customers better communicate

- Review all translated materials to ensure the information is presented in language that is simplified and accessible to reader of various levels of formal education
- Target social media posts to reach Spanish speakers within Santa Rosa and neighboring communities
- Training for staff in the basics of communicating with Spanish-speakers
- Additional “guide-a-ride” style bus schedule information at key bus stops
- Posting or distribution 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

#### Task 4 - Step 3: Analyze your budget

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The Transit Division budget is constrained at this time given reduced funding from several sources of operating funds. However, there is capacity within the Division’s marketing budget to provide translation of materials into Spanish on an ongoing basis, in keeping with the current practice. We believe that many of the language assistance measures identified in Task 4, Step 3 can also be implemented within the existing budget. Grants can be pursued for any measures that cannot be implemented within the existing budget.

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

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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.
- 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.

We also believe that 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.

## V. 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 and posted at the following locations

- Inside buses (car cards)
- Transit Division offices at City Hall and the 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.

## VI. 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                      | - Paratransit Supervisors            |
| - Field Supervisors                  | - Transit Superintendent             |
| - Customer Service Staff             | - Transit Planners                   |
| - Transit Service Representatives    | - Paratransit Operators              |
| - Marketing and Outreach Coordinator | - 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 and paratransit eligibility evaluations will be delivered in coordination with the paratransit contractor and eligibility process contractor.

## VII. 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 Transit Division staff; and
- New data related to LEP populations in the CityBus service area.



If evaluation of new information received during monitoring of the plan leads to substantive changes in language assistance policies or practices, the Language Assistance Plan will be updated accordingly.

# **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://srcity.org/DocumentCenter/View/20677/FY-2016-25-SRTP--FINAL-161027>.

### 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 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 of 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.

### III. Service Policies

- A. **Vehicle Assignment:** Vehicles are assigned to routes based on ridership demands and in accordance with the *System Safety Program Plan*, with newer vehicles being rotated across all routes. Specific vehicles are assigned to routes only when required by operating conditions (e.g., in cases where a smaller bus is required to provide service on narrower streets).
- B. **Transit Amenities:** New bus stop amenity locations follow adopted guidelines, subject to constraints related to safety, ADA compliance, and other factors. 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 advantageously 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 will additionally be 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.

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 provided at the Transit Mall and on all CityBus vehicles. 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.