

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

Santa Rosa CityBus Title VI Program

Revised February 2016

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 at City Hall and 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 2013), the Transit Division has received no complaints alleging discrimination based on race, color, or national origin.

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 2013, the Transit Division has conducted the following outreach activities:

- Monthly travel trainings serving individuals at organizations throughout the city.
- Learn to Ride program provided to schools on an annual basis.
- Participation in community events:
 - Cesar Chavez Health
 - CHOPS Youth Empowerment Conference
 - Santa Rosa Earth Day Festival
 - Senior Expo of Santa Rosa
 - Santa Rosa Junior College Day Under the Oaks
 - Roseland Cinco de Mayo

- Public Planning Workshops (six for the “Reimagining CityBus” project 2014-2015). Meetings were held at different times of day, and at locations throughout the city. All meetings were widely advertised in English and Spanish, with notification given of the availability of oral interpretation at all meetings. The 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.
- Workshop at senior housing facilities (5 in 2015)
- Focus Group meetings (2015). Partnered with community organization to engage LEP members of the public who are less likely to attend traditional public meetings.
- Stakeholder Meetings (20 in 2015)
- Outreach at the Transit Mall, Coddington and Santa Rosa Junior College quad (several days throughout 2014-2015)
- Webinar for Reimagining CityBus (over 500 views on YouTube)
- Roseland Specific Plan Community Workshops (several days in 2014-2015)
- Latino Service Providers meetings
- Paratransit User Group meetings (several meetings/year 2013-2016)
- 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 Neighborhood Alliance, Social Advocates for Youth, the Sonoma County Transportation and Land Use Coalition, Leadership Santa Rosa, and others.
- Priorities and tradeoffs survey (over 800 responses in English and Spanish).

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 2013.

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).

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, 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) 543-3060

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 7th Street, Ste. 15-300
San Francisco, CA 94103
Tel: (415) 744-3133 Fax: (415) 744-2726

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) 543-3060

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 7th Street, Ste. 15-300
San Francisco, California 94103

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, DC 20590

Office of Civil Rights
Federal Transit Administration
Attn: Title VI Program Coordinator
East Building, 5th Floor - TCT
1200 New Jersey Ave., SE
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.

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 February 2016

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 9030.1D, 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 information is created that explains the proposed changes. These informational materials (available in English and Spanish) are placed on the 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 the final decisions. The goal of the Transit Division is to always provide the best possible service to the most current riders or potential riders.

Appendix D

Language Assistance Plan

Language Assistance Plan

February 2016

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 assisted us by participating in interviews, completing surveys, and organizing focus groups of LEP individuals, as well as the individuals who participated in the focus groups.

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 late January and early February 2016 to gauge prior experiences with LEP individuals. The number of responses received for each job category is displayed in Table 1.

Table 1: Staff Survey Responses by Job Category

Job Category	Responses
CityBus	
CityBus Operator	47
Field Supervisor	4
Customer Service Staff	3
Transit Service Representative	3
Marketing and Outreach Coordinator	1
Transit Planner	1
Total	59
Santa Rosa Paratransit	
Paratransit Operator	12
Paratransit Customer Service	2
Paratransit Supervisor	1
Total	15

Staff were asked to report how often they interact with limited English proficient 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

Job Category	Interactions per Week				Responses
	0-5	6-20	20-40	40+	
CityBus					
CityBus Operator	13	9	14	11	47
Field Supervisor	3			1	4
Customer Service Staff	2	1			3
Transit Service Representative			1	2	3
Marketing and Outreach Coordinator	1				1
Transit Planner	1				1
Total	20	10	15	14	59
Santa Rosa Paratransit					
Paratransit Operator	8	1	1	2	12
Paratransit Customer Service	1	1			2
Paratransit Supervisor	1				1
Total	10	2	1	2	15

Staff were also asked to report how successful they were in communicating with LEP individuals (Table 3). Most respondents (67.6%) felt that they are able to effectively communicate “most or all of the time.” 24.3% reported successful communication “some of the time” and 8.1% felt that they were most often unable to communicate effectively with LEP individuals.

Table 3: Staff Ability to Communicate with LEP Individuals

Job Category	Most or all of the time	Some of the time	Not very often	Responses
CityBus				
CityBus Operator	32	12	3	47
Field Supervisor	2	2		4
Customer Service Staff	2	1		3
Transit Service Representative	3			3
Marketing and Outreach Coordinator		1		1
Transit Planner		1		1
Total	39	17	3	59
Percent of Total	66.1%	28.6%	5.4%	

Santa Rosa Paratransit				
Paratransit Operator	8	1	3	12
Paratransit Customer Service	2			2
Paratransit Supervisor	1			1
Total	11	1	3	15
Total - Both Services	50	18	6	74
Percent of Total - Both Services	67.6%	24.3%	8.1%	

According to the staff surveyed, the most common questions asked by limited English proficient 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?

Suggestions offered by CityBus and Santa Rosa Paratransit staff for language assistance measures include:

- Do more to make the social media accessible to LEP individuals
- More information printed in Spanish, including guidelines for riders
- Marketing more on Spanish radio, TV and newspapers

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 the unincorporated area of Roseland in the southwest quadrant of the city, as well as other smaller unincorporated "islands" within the Santa Rosa city limits. For this analysis, data have been collected both for the City of Santa Rosa and the Roseland Census-Designated Place (CDP).

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

Data was obtained from the American Community Survey 2009-2014 5-year estimates. These data are presented and analyzed below.

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

Table 4 provides the breakdown of the top fifteen languages spoken in the CityBus service area. The most significant non-English language populations speak Spanish, African languages,
 Last Update: February 2016

Chinese and Vietnamese. As discussed further below, a large proportion of Spanish, African languages, Chinese and Vietnamese speakers also speak English “very well”.

Table 4: Top Fifteen Languages Spoken in Santa Rosa, 2014

Language Spoken	Population
English	113,110
Spanish or Spanish Creole	39,466
African Languages	1,273
Chinese	1,250
Vietnamese	1,118
Tagalog	943
Mon-Khmer, Cambodian	921
Other Pacific Island Languages	647
Laotian	620
French (incl. Patois, Cajun)	550
German	521
Other Indic Languages	500
Italian	487
Persian	430
Russian	408

Source: American Community Survey 2009 – 2014, 5-year estimates (Table B16001: Language Spoken at Home by Ability to Speak English for Population 5 Years and Older)

Table 5 displays the number of residents of the Santa Rosa CityBus service area who spoke English “less than very well” in 2014. The total population five years and older in Santa Rosa and the Roseland CDP was 165,005. Of that number, 22,643 (13.7% of the population) spoke English “less than very well”. Over 79% of the residents speaking English “less than very well” were Spanish-speakers (18,076 residents). After Spanish, the languages with the largest number of limited English proficient individuals were Chinese (660) and Vietnamese (647). Less than one-half of all Santa Rosa Spanish, Chinese and Vietnamese-speakers spoke English “less than very well” in 2014.

Table 5: Residents Five Years and Older Speaking English "less than Very Well", 2014

Language Spoken	Estimate
Total:	165,005
Speak only English	113,110
Spanish or Spanish Creole:	39,466
Speak English less than "very well"	18,076
French (incl. Patois, Cajun):	550
Speak English less than "very well"	34
French Creole:	-
Speak English less than "very well"	-
Italian:	487
Speak English less than "very well"	64
Portuguese or Portuguese Creole:	373
Speak English less than "very well"	254
German:	521
Speak English less than "very well"	38
Yiddish:	9
Speak English less than "very well"	-
Other West Germanic languages:	107
Speak English less than "very well"	23
Scandinavian languages:	37
Speak English less than "very well"	0
Greek:	108
Speak English less than "very well"	4
Russian:	408
Speak English less than "very well"	170
Polish:	51
Speak English less than "very well"	43
Serbo-Croatian:	133
Speak English less than "very well"	51
Other Slavic languages:	66
Speak English less than "very well"	15
Armenian:	52
Speak English less than "very well"	0
Persian:	430
Speak English less than "very well"	124
Gujarati:	48
Speak English less than "very well"	24
Hindi:	261
Speak English less than "very well"	89
Urdu:	31
Speak English less than "very well"	19

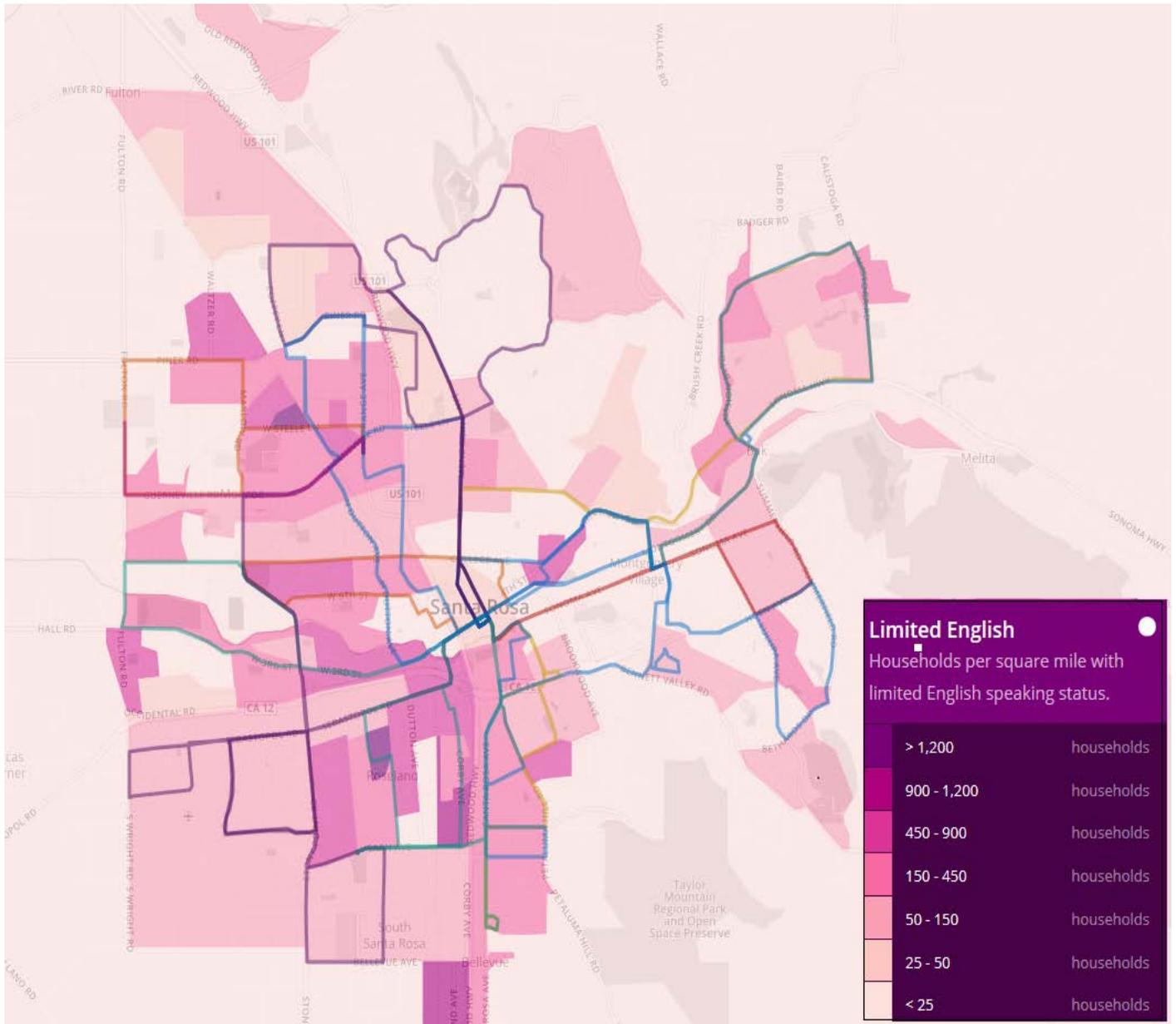
Other Indic languages:	500
Speak English less than "very well"	318
Other Indo-European languages:	120
Speak English less than "very well"	60
Chinese:	1,250
Speak English less than "very well"	660
Japanese:	285
Speak English less than "very well"	72
Korean:	343
Speak English less than "very well"	132
Mon-Khmer, Cambodian:	921
Speak English less than "very well"	499
Hmong:	54
Speak English less than "very well"	54
Thai:	191
Speak English less than "very well"	62
Laotian:	620
Speak English less than "very well"	343
Vietnamese:	1,118
Speak English less than "very well"	647
Other Asian languages:	76
Speak English less than "very well"	36
Tagalog:	943
Speak English less than "very well"	300
Other Pacific Island languages:	647
Speak English less than "very well"	126
Navajo:	-
Speak English less than "very well"	-
Other Native North American languages:	-
Speak English less than "very well"	-
Hungarian:	16
Speak English less than "very well"	-
Arabic:	226
Speak English less than "very well"	72
Hebrew:	96
Speak English less than "very well"	-
African languages:	1,273
Speak English less than "very well"	369
Other and unspecified languages:	78
Speak English less than "very well"	0

Source: American Community Survey 2009 – 2014, 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, the West Third Street corridor, the West College/West Ninth neighborhood, and the Coddington/West Steele Lane area. There is also a high concentration found south of the incorporated area of the City of Santa Rosa, in the Moorland Avenue neighborhood west of Highway 101.

Figure 1: Areas with High Concentrations of LEP Individuals, Santa Rosa, 2013



Source: American Community Survey 2009-2013

Last Update: February 2016

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

Data from the California Department of Education were analyzed to identify the languages spoken by English Learners in Santa Rosa schools. Table 6 presents the number of English Learners in Santa Rosa schools, by language spoken. Of the 9,790 students who were English Learners in 2014-2015, 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 6: English Learners in Santa Rosa Schools by Language Spoken, 2014-2015

Language	Number of English Learners
Spanish	9,114
Vietnamese	115
Khmer (Cambodian)	72
French	46
Filipino (Pilipino or Tagalog)	45
Tigrinya	41
Lao	36
Punjabi	32
Mandarin	31
Cantonese	20
Hindi	18
Arabic	15
Samoan	14
Urdu	13
Japanese	12
Russian	11
Korean	8
Korean	8
Gujarati	6
Thai	6
German	5
Portuguese	5
Italian	4
Farsi (Persian)	3
Ilocano	3
Tamil	3
Bengali	3
Pashto	2
Cebuano (Visayan)	2
Hmong	2
Marathi	2
Mien (Yao)	2
Polish	2
Dutch	1
Indonesian	1
Lahu	1
Rumanian	1
Tongan	1
Turkish	1
Ukrainian	1
Burmese	1
All other languages	86

Source: California Department of Education, Demographics Department

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 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.

Organizations and agencies to be contacted were prioritized based on their apparent level of involvement with LEP individuals. Staff were contacted and asked to participate in a phone interview or to fill out a short survey. Three community organizations and social service agencies completed the surveys; Roseland English Adult Learners, Catholic Charities of Santa Rosa and Goodwill Industries.

Task 1, Step 4C: Obtain information.

During interviews with staff 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 between 120 and 7,000 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.

All stated that the LEP individuals they serve are immigrants from Latin American countries, with the largest proportion immigrating from Mexico.

Transportation Needs or Issues

All agency staff stated that their clients ride the bus; with commonly cited destinations including work, school or college, citizenship or ESL classes, grocery shopping, and medical appointments. Staff reported that clients can have difficulty using the bus because of the length of trips and the limited frequency.

Effective Ways to Communicate with Client Population

According to the staff interviewed, LEP individuals would prefer "clearly" written brochures in their native language. A few respondents noted that one-on-one communication between

organization/agency staff and LEP individuals was often the best way to provide information. Other effective means of communication cited by respondents to previous interviews of community organization staff include Spanish-language radio and peer networks. Community organization staff have noted that many undocumented individuals have a distrust of government and fear of deportation which limits their involvement in meetings or willingness to voice needs or complaints directly.

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.

As identified in Task 1, LEP individuals inquire about, use, and are affected by the services Santa Rosa CityBus provides 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, and the CityBus website.

Task 2, Step 2: Review information obtained from community organizations.

As discussed in Task 1, Step 4, staff of community organizations and social service agencies reported that many of their clients use transit, including Santa Rosa CityBus and Sonoma County 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.

Information collected during focus groups with approximately 45 transit riders (60% of which reported that they spoke English “not very well”) conducted in collaboration with community partners during initial development of the CityBus Language Assistance Plan included the following:

- Participants get CityBus information from a wide variety of sources, but the most common responses were that participants get information from bus drivers or from CityBus’ bilingual system maps. Rider alerts/notices, CityBus Transit Service Representatives, and the CityBus website were also cited by several respondents. Several participants indicated that they think CityBus already does a good job of providing information in Spanish.
- Participants’ suggestions for how CityBus information could be provided included making transit information and fare products available at stores that are popular with Spanish speakers, such as Lola’s Market, Rancho Mendoza, Dollar Tree, and Food Maxx;

more bus stops with bus schedule information and maps (with a “you are here” indicator) for orienting riders; real-time bus arrival information (now available); providing Spanish language training to bus drivers; and via mail and local news, including Spanish-language radio (e.g., KBBF).

- It can be confusing when buses change routes (i.e., when interlined buses change from one route to another at the Transit Mall)—providing information to indicate how buses are interlined would be helpful.
- Public information indicating which routes to take to popular stores would be helpful.

Transit Division staff plan additional consultation with LEP individuals in early 2016 as part of its “Reimagining CityBus” project. The Language Assistance Plan will be updated with any new information collected as part of that consultation.

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

Task 3, Step 1: Identify your agency’s most critical services.

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 to employment. Critical services provided by the Transit Division include:

- CityBus route and schedule information
- Fare media information
- System rules, particularly transfer rules
- Information on how to ride the system
- Rider Alerts
- 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 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.

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

- Phone translations are provided through an AT&T calling service for any individual.
- Use of pictograms or additional translation related to required actions/behavior onboard vehicles
- A number of CityBus staff, including bus operators, a Transit Service Representative, and administrative/customer service staff are proficient in Spanish.
- Route information that can be accessed through the automated phone system is recorded in both English and Spanish.
- System maps and schedules have all fare, holiday, contact, and trip planning information in both English and Spanish.
- Customer information brochures (e.g., Learn to Ride CityBus, Fare Policy) and Rider Alerts are printed in both English and Spanish.
- Paratransit Rider 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 announced/advertised on local Spanish-language radio stations and published in *La Voz* newspaper.
- Interpretation is provided for Spanish-speakers at public meetings and workshops.
- All information on the City's website (www.srcity.org), including transit and paratransit information, can be translated into numerous languages by clicking on the desired language at the bottom of the web screen.

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:

- Training for staff in the basics of communicating with Spanish-speakers
- Provision of information on schedules indicating interlines
- Additional “guide-a-ride” style bus schedule information at key bus stops
- A listing of popular destinations and bus routes that serve those destinations to aid with trip planning
- Posting or distribution of targeted transit information at stores that are popular with Spanish speakers
- Translation of additional paratransit paperwork
- 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.

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.

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

- Add larger translation “button” on Transit division webpages to make it easier for pages to be translated
- 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.

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

CityBus will create and post a notice informing riders and other members of the public of the availability of free language assistance and how to access it. The notice will be 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 will be provided to all Transit Division and staff, as well as staff of the paratransit contractor. The notice will also 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 | - 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.

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 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 2012-21 CityBus Short-Range Transit Plan, which may be accessed at: <http://ci.santa-rosa.ca.us/doclib/documents/SRTP2012web1217.pdf>. We anticipate that these standards may be changed as a result of the Comprehensive Operational Analysis that is currently underway and the upcoming update to the Short Range Transit Plan. The Title VI program will be amended to reflect these changes.

II. Service Standards

- A. **Vehicle Load:** Vehicle loads shall not exceed 1.5 in peak periods and 1.0 in off-peak periods. (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:** Vehicle headways are determined based on ridership demand, service type, time of day, and day of the week. For weekday services, policy headways are 30 minutes for core trunk, feeder, and crosstown services, and 45-60 minutes for coverage-oriented or "lifeline" services. Fifteen minute headways may be implemented on high-ridership, high-productivity services where justified by demand.
- C. **On-time Performance:** At least 90% of scheduled arrivals will be on-time (within 5 minutes).
- D. **Service Availability:** 95% of dwelling units in areas having six or more units per acre shall be located within ¼ mile of a CityBus bus stop.

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).

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. In addition, a pole-mounted timetable is provided bus stops located at major timepoints. 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.