

**THE BOARD OF SUPERVISORS OF THE COUNTY OF STANISLAUS
BOARD ACTION SUMMARY**

DEPT: Public Works

BOARD AGENDA:5.C.2
AGENDA DATE: September 22, 2020

SUBJECT:

Approval of the Stanislaus County Public Works Transit Title VI Program to Comply with the Civil Rights Act of 1964

BOARD ACTION AS FOLLOWS:

RESOLUTION NO. 2020-0508

On motion of Supervisor Withrow _____, Seconded by Supervisor DeMartini _____
and approved by the following vote,
Ayes: Supervisors: Chiesa, Withrow, DeMartini and Chairwoman Olsen _____
Noes: Supervisors: None _____
Excused or Absent: Supervisors: District Four vacant _____
Abstaining: Supervisor: None _____

- 1) Approved as recommended
- 2) _____ Denied
- 3) _____ Approved as amended
- 4) _____ Other:

MOTION:

ATTEST: Kelly Rodriguez
KELLY RODRIGUEZ, Assistant Clerk

File No.

**THE BOARD OF SUPERVISORS OF THE COUNTY OF STANISLAUS
AGENDA ITEM**

DEPT: Public Works

BOARD AGENDA:5.C.2
AGENDA DATE: September 22, 2020

CONSENT:

CEO CONCURRENCE: YES

4/5 Vote Required: No

SUBJECT:

Approval of the Stanislaus County Public Works Transit Title VI Program to Comply with the Civil Rights Act of 1964

STAFF RECOMMENDATION:

1. Approve the Stanislaus County Public Works Transit Title VI Program to comply with the Civil Rights Act of 1964.

DISCUSSION:

The Public Works Transit Division operates the Stanislaus Regional Transit system (StaRT), which must comply with the Federal Transit Administration (FTA) regulations and requirements to receive Federal grant funding. California Department of Transportation (Caltrans) is responsible for ensuring that grant recipients follow Federal statutory and administrative requirements.

Every three years, StaRT is required to submit Title VI Civil Right program information to Caltrans, which includes such items as Notices to the Public, Complaint Procedures and Forms, administrative analysis, resources, monitoring procedures, service standards, and policies. The StaRT Title VI Program document includes all items required by Caltrans and the FTA. The online program document also provides links to forms and procedures for public access.

StaRT's initial Title VI Program document was developed and approved in 2014 and updated in October 2016 for the 2017 compliance requirement.

POLICY ISSUE:

The Federal Transit Administration requires Board review and approval of the Transit Division Title VI Program every three years.

FISCAL IMPACT:

Approval of the Stanislaus Regional Transit Title VI Program is required for future Federal funding of the County's transit system.

BOARD OF SUPERVISORS' PRIORITY:

The recommended action is consistent with the Board's priority of *Delivering Efficient Public Services and Community Infrastructure* by complying with the Federal Transit Administration requirements for Title VI Program compliance and meeting qualifications for federal funding support of the local transit system.

STAFFING IMPACT:

Public Works Transit staff is responsible for updating and administering the Title VI Program requirements.

CONTACT PERSON:

David A. Leamon, Public Works Director
Leticia Ortiz, Transit Manager

Telephone: (209) 525-4151
Telephone: (209) 525-7569

ATTACHMENT(S):

1. 2020 Stanislaus Regional Transit Title VI Program



Stanislaus County Public Works - Transit Division
aka Stanislaus Regional Transit (StaRT)
2020 Title VI Plan Update

Stanislaus County Public Works – Transit Division 1010 10th Street, Suite 4204
Modesto, CA 95354
www.srt.org

2020 Title VI Program Update
TRANSITSTAFF@stancounty.com

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Introduction:

This document was prepared by the Stanislaus County Public Works Transit Division, also known as Stanislaus Regional Transit (StaRT), in order to comply with Title VI of the Civil Rights Act of 1964; including new provisions detailed in the United States Department of Transportation Federal Transit Administration (FTA) Circular 4702.1B, *Title VI Requirement and Guidelines for Federal Transit Administration Recipients*. Title VI is a Federal statute mandating that “no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal Financial Assistance.” Moreover, due to Stanislaus Regional Transit being a recipient of federal funds, Stanislaus Regional Transit must also comply with Presidential Executive Order 13166, that went into effect August 2000. Presidential Executive Order 13166 “requires Federal agencies [and recipients of federal funding] to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them.”

As a condition for acceptance of federal financial assistance, the Federal Transit Administration (FTA) requires recipients to provide an assessment of their compliance with the aforementioned FTA Circular (most current being 4702.1 B) and Executive Order 13166. This must be provided to the Federal Transit Administration on a triannual basis. Stanislaus County Public Works Transit Division, being a recipient of federal financial assistance, has outlined in the following body of this document its compliance and efforts in maintaining and further growing its nondiscrimination transit services and programs. Stanislaus Regional Transit’s Title VI measures also highlight a review of the last three years of implementation as well as analysis and assessment for programs measures to be implemented in the future in order to continuously enhance its transit services and programs. The following program update covers the October 1st, 2016 – September 30th, 2019 reporting period.

Stanislaus County Transit Background:

Stanislaus Regional Transit (StaRT) was established in 1981 as the primary public transit service system in Stanislaus County to serve population centers in the County and several communities in neighboring Merced County to the south. Before Route Numbers were in place, StaRT’s routes were known as MTS (Modesto Turlock Stage), WSS (Westside Stage) and MRO (Modesto Riverbank Oakdale). StaRT also used to run a service called the Westside Dial-A-Ride which covered all the towns on the Westside and Central Dial-A-Ride, which encompasses the following areas: Riverbank/Oakdale/Ceres/Turlock/Hughson/Waterford. As the principal inter-city transit operator in Stanislaus County, StaRT has been balancing service needs with funding and cost constraints while making efforts to foster regional transit coordination. From its beginnings, StaRT has evolved from providing only lifeline service to becoming a major trunk carrier connecting larger cities as well as meeting transit needs of smaller cities and unincorporated communities in the Stanislaus region. Over time the County expanded services as demand grew to what it is today.

StaRT provides 7 fixed bus routes Mondays through Fridays, beginning as early as 5:00 a.m. and ending generally at 10:22 p.m. StaRT does not provide service on Sundays. Routes range from one-hour headways to two-hour headways.

On Saturdays, StaRT operates 6 routes beginning at 6:15 a.m. and ending generally at 9:00 p.m. one operates on one-hour and 45 minutes headway, two on two-hour headways and three on three-hour headways.

StaRT provides Dial-A-Ride service in Newman, Oakdale, Patterson, and Riverbank Mondays through Fridays beginning at 6:30 a.m. and ending generally at 6:00 p.m. Saturdays beginning at 7:30 a.m. and ending generally at 4:30 p.m.

StaRT provides shuttle service between the communities/cities of Modesto, Riverbank, Oakdale, Ceres, Keyes, Turlock, Denair, Empire, Waterford, Hickman, and Hughson Mondays through Fridays beginning at 6:00 a.m. and ending generally at 5:30 p.m. Saturdays beginning at 7:30 a.m. and ending generally at 3:45 p.m.

StaRT provides Medivan service to the Bay Area Mondays through Thursdays. The Medivan leaves at 6:00 a.m. from the Modesto Transit Center to the Bay Area medical facilities.

StaRT provides a weekday morning commuter route from Turlock & Patterson to the Dublin/Pleasanton Bay Area Rapid Transit (BART) Station, and an evening commuter route from Dublin/Pleasanton to Turlock & Patterson.

In addition, StaRT provides senior/disabled paratransit service to satisfy the Americans with Disabilities Act (ADA). The ADA complementary paratransit service runs from 5:00 a.m. to 10:20 p.m., Monday through Friday, and 6:15 a.m. to 9:00 p.m. on Saturdays.

Title VI:

Stanislaus County Public Works Transit Division's Title VI Program Goals are:

- Ensuring that the level and quality of public transportation service is provided in a nondiscriminatory manner;
- Promoting full and fair participation in public transportation decision-making without regard to race, color, or national origin;
- Ensuring meaningful access to transit-related programs and activities by persons with limited English proficiency

Public Notification Process:

Stanislaus County Transit does not discriminate against any person with respect to any federally assisted transit program or service. Stanislaus County Transit provides information regarding its Title VI obligations to the public using a variety of methods. Information, including references to FTA circulars, the Transit Title VI Program, and the Title VI complaint procedure, is available on the StaRT website and at the Stanislaus County Transit Division office in Modesto. The required notice on Non-Discrimination Policy (**Appendix A**) is posted at the following locations:

Locations Where StaRT's Non-Discrimination Policy Statement is Posted

Location Name	Address	City
Offices	1010 10 th Street, Suite 4204	Modesto
Website	srt.org	N/A
Stations and Stops	Transit Centers and Transfer Location	Cities of Modesto, Turlock, and Patterson
Vehicle Storages	1216 Doker Drive	Modesto
	3519 McDonald Avenue	Modesto
All StaRT Transit buses	Infotainment Screens	N/A
StaRT Ride Guide	N/A	N/A

Complaints:

Stanislaus County Transit Division has a complaint process in place. Title VI Complaints are filed through the StaRT website or in person. The complaint procedure is available in English and in Spanish and can be accessed on the srt.org website and at the administrative office in Modesto. Copies of these documents are in **Appendix B**.

Title VI complaints are made to the administrative offices of Stanislaus County Public Works - Transit Division. All individuals making a Title VI complaint shall be notified in writing of the protections and due process procedures available to them as provided by Title VI. All Title VI complaints are recorded in a special Title VI file. Following the filing of a complaint, Stanislaus County Transit Division will investigate and ensure that all necessary follow-up actions are conducted. As required by the FTA, the Title VI complaint file includes the date of the complaint, the date(s) of the investigation, summary of the allegation, current status of the investigation, and actions, legal or administrative, taken as a result of the complaint.

Summary of Transit Related Title VI Investigations, Complaints and Lawsuits

Between the October 1st, 2016 and September 30th, 2019 reporting period, 5 complaints were filed against the Stanislaus County Public Works-Transit Division. No lawsuits were filed during this reporting period. Each complaint's respective summary of incident, date of occurrence, the date(s) of the investigation, current status of the investigation, and final findings and actions taken as a result of each complaint have been recorded and can be viewed in the appropriate Appendix section of the document (**Appendix B**).

Public Participation Plan:

Purpose of Plan

Public participation is the process through which stakeholders can participate directly in the County's Public Works Transit Division decision-making and express their concerns as well as ask questions about transit services and programs in Stanislaus County. The Transit Division's public involvement effort consists of notifying and soliciting feedback from the public regarding transit services without creating disproportionate and adverse effects on minority and/or low-income populations. Typically, the County's Transit Division utilizes established procedures to address public outreach efforts that include the activities outlined below.

1. **Public Notice Procedures:** At a minimum, StaRT places legal advertisements in local newspapers to announce proposed changes including fare changes and describe how the public may provide comment. StaRT also prepares notices that are uploaded on the infotainment system which is displayed on the infotainment screen on all of StaRT's buses. Other activities include posting information on StaRT's Website and Facebook page; notifying agency and business partners directly via mail or e-mail.
2. **Solicitation of Public Comment Practices:** To ensure public comment is considered, StaRT will schedule public meetings to gather input during the development of a fare and/or service change proposal. A formal public hearing will be held at the Board of Supervisors meeting during regularly scheduled Board meetings.

To the extent possible, StaRT will provide an interpreter for anyone wishing to address the Stanislaus Council of Government (StanCOG) Policy Board given a 72-hour notice. StaRT provides additional translation accommodations, as needed, at public meetings. StaRT makes all agendas available upon request in appropriate alternative formats to persons with disabilities as required by ADA. StaRT staff documents all comments and suggestions submitted.

3. **Final Recommendations:** A summary of the comments received will be furnished upon request for public review at StaRT's office at 1010 10th Street, Suite 4204, Modesto, CA. Staff recommendations will be made in writing to the Board of Supervisors after considering the issues raised and recommendations by the Transit Manager.
4. **Implementation:** As a part of this process, StaRT will develop an implementation plan for proposed fare and/or service changes as currently done with the plan, outlining ongoing public outreach and education needed.

Public Notification

As required, the public comment process begins with publishing a legal notice in the local newspaper of general circulation. Written comments sent via mail, fax, or email will also be accepted on the proposed adjustments for a period of not less than 25 calendar days beyond initial

publishing of the legal notice. No public hearings are held earlier than 15 days following the initial publication of the legal notice with written comments accepted three calendar days following a public hearing. Legal notices inform the public of proposed actions which initiated the public comment process, how comments will be received, and, if applicable, the locations, dates, and times of additional scheduled public hearings.

Scheduling Public Hearing Location and Time:

Service changes and adjustments that have agency-wide implications may require multiple public meeting locations in order to maximize convenience to patrons that are affected. To the extent possible, public hearings will be scheduled at locations 1) in proximity to the area affected by the proposed adjustments, and 2) in proximity to regular bus routes. All facilities utilized for public hearings will be accessible to persons with disabilities. Special arrangements will be made for the sight or hearing impaired if requested. When proposed service adjustments affect only a limited area of the service area, efforts are made to schedule the hearing at a location near the affected area. Hearings are scheduled to begin at a convenient time, usually midday and/or early evenings.

Procedure for Conducting Public Hearings:

Comment forms are offered to register the public's presence and desire to speak or as an alternate method of providing their written comments. The purpose, proceedings, and proposed actions, which necessitated the public hearings, will be explained for clarification. Introductory proceedings will encourage the audience to comment on the proposed actions for which the hearing was scheduled. When the explanation of proposed actions is completed, the public will be invited to offer their comments. The public are requested to limit their individual comments to three (3) minutes until all persons have been given the opportunity to speak. After all registered persons have commented, a final opportunity is offered for any additional public comment.

Documentation of Public Hearings:

Official records of StaRT's public hearings on fare or service adjustments will be generated by development of 1) affidavits of newspaper publications of public notices. Records of public comment will be maintained on file at StaRT.

Addressing Public Comments Received:

All relevant comments received, verbally or in writing at a public hearing or as otherwise conveyed to StaRT prior to the established deadline, will be entered into the public record of the comment process. Subsequent to the comment period, staff will evaluate and analyze all relevant comments received. StaRT's Board of Supervisors will be notified of all public comment solicitations in advance of all scheduled public hearings on fare and service adjustments. Upon approval by the Board, the Transit Manager will be directed accordingly to proceed with or amend the recommended service and/or fare adjustments.

Summary of Outreach Efforts Made

The following summarizes outreach efforts conducted by the Stanislaus County Public Works Transit Division as they relate to Title VI requirements under the Public Participation Plan. Most of the activities are conducted in partnership with other County transit operators, the Consolidated Service Transportation Agency, and human and social service agencies within the community. While this is by no means all events in which the County transit staff participates; rather, it documents outreach efforts related to minority and low-income population.

Stanislaus County Board of Supervisors (BOS) Meetings:

The BOS meetings are open to the public and are held every Tuesday each week of the month. The meetings are published on the County's website with the Transit Manager attending almost all meetings.

Stanislaus Council of Governments (StanCOG):

Transit Manager or Staff Services Coordinator attend committee meetings held at StanCOG including the Social Services Advisory Committee, the Technical Advisory Committee, Management and Finance Committee, as well as the Policy Board meetings.

Unmet Transit Needs Meeting:

The County Transit Division attends and participates in activities related to the County's unmet transit needs meeting held by StanCOG throughout the community. As part of this process, the Transit Division staff makes presentations at congregate meal sites where meetings are held in conjunction with activities for seniors in those communities. Unmet transit Needs Meetings have taken place in Ceres, Empire, Newman, Oakdale, Patterson, Riverbank, Turlock.

Community Senior Fairs:

These events are to provide resources on transportation services in the County to seniors and persons with disabilities that reside in various cities throughout the county.

Healthy Aging Summit:

This event is held annually in the City of Modesto. It is a Health Fair for seniors and information booths are set up by different agencies to provide seniors with information regarding programs and services.

Stanislaus Elder Abuse Prevention Alliance (SEAPA)

This event is held annually in the city of Turlock. Guest speakers educate seniors on needed subjects and agencies set up information booths regarding their services.

Earth Day (Reduce-Reuse-Recycle-Compost)

This event is held annually in the city of Modesto. This event offers many opportunities to learn about the environment in a family-friendly atmosphere. Many community organizations participate by setting up information booths regarding their programs and services.

Bike to Work Event

This event is held annually in the City of Modesto. Local cyclists are encouraged to Bike to Work and commute by bicycle into downtown Modesto. Every year there are dozens of riders who either join the Mayor for an organized ride or cycle in on their own. A mini vendor fair takes place where Prizes, goodies and information is distributed to the cyclists.

Dump the Pump Event

This event is held annually in the City of Modesto. The event promotes dumping the pump and using public transportation. Stanislaus County Transit and City of Modesto Transit are both present at the event to provide information, answer questions and listen to concerns regarding public transportation.

Program Coordinating Committee Meeting

These meetings are held every three months by the Stanislaus County Housing Authority. Various agencies attend this meeting to collaborate in making the most updated information regarding programs and services available to the Stanislaus County community.

Satisfactory Surveys:

The County's Public Works Transit Division conducts satisfaction surveys with transit passengers to determine the level of satisfaction and receive input regarding unmet needs as well as service improvements.

County's Public Works Transit Division:

The Transit Division routinely posts notices and announcements on the agency's website, srt.org.

Additional events in which the County's Transit Division staff participated in during the October 1, 2016-September 30, 2019 reporting period include: America Recycles Day, Oakdale Senior Day Event, Safe Place and 209 Freedom Project Taskforce Meetings, Patterson Apricot Festival, Commission on Aging Event, Turning Point presentation, Public Works Day, HICAP Senior Awareness Day, Cost Sharing Meeting, DRAIL's Advocacy Group Meeting, East Avenue Manor Presentation, KAT Country Van Hit in Patterson, KHOP Van Hit in Newman, Service Changes Public Meetings located in Grayson, Modesto, Oakdale and Patterson, the Spring Festival in Waterford, Stanislaus County Fair in Turlock.

Outreach Plan to Engage Minority and LEP Populations

The County Transit Division will continue to work with community organizations that serve LEP persons to perform the four-factor analysis and to identify additional programs, services, or activities that may need to be improved to provide access to services for LEP persons. Staff will evaluate projected financial needs to ensure that programs, services, and activities provided are cost effective and will:

- A. Continue to review and evaluate LEP Outreach and Implementation plan
- B. Assess LEP population annually in StaRT's service area to:

- i. Identify LEP individuals need language assistance
 - ii. Conduct outreach to community groups serving LEP persons
 - iii. Interview/survey staff about previous experience with LEP individuals
 - iv. Continue to work and identify areas within the service area with high concentrations of LEP persons.
- C. Review language assistance measures to determine if changes are needed.
 - D. Determine if the number of LEP population has increased, or if other LEP persons have moved into StaRT's service area.
 - E. Monitor and update the Language Assistance plan as well as provide notice to LEP persons about changes to StaRT's programs, services, and facilities.

Language Assistance Plan

Consistent with Title VI, DOT's implementing regulations, and Executive Order 13166, Stanislaus County Transit takes reasonable steps to ensure meaningful access to benefits, services, information, and other important transit activities for individuals who are Limited-English-Proficient (LEP).

To provide meaningful access to Stanislaus County Transit programs and services for persons who have limited English proficiency, a Language Assistance plan was developed (**Appendix C**). This plan is a training tool and guide for transit staff members on how to recognize a person who may need language assistance and how to provide that assistance.

During the prior Title VI Plan update tasks were set out for the implementation of the Language Assistance Plan. During the 2017-2019 period tasks were completed and we made good strides in training. We will continue to implement best practices and training.

Local demographic data reveals a need to provide language assistance within the Spanish-speaking community. It is the goal of Stanislaus County Transit's LEP program and plan to provide bilingual English/Spanish editions of all public transit information materials. During this reporting period, critical information documents for StaRT, except for limited text portions on the StaRT system map, have been translated into Spanish. In addition, any service change notices are posted on the website, at key transit sites, and are prominently displayed in all buses in both English and Spanish.

StaRT operations has customer service staff members who are bilingual and are trained to assist persons with limited English language proficiency. Stanislaus County Transit also has access to a Language Line phone support which can provide real time translation support in many languages.

Committee Membership:

Title 49 CFR Section 21.5(b)(1)(vii) states that the recipient of a federal transit grant 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.

No table of committee member racial breakdown is included in this report since Stanislaus County transit has no committees for which it appoints members.

Subrecipients:

The Stanislaus County Public Works Transit Division does not have any subrecipients at this time and will revisit this issue if the Transit Division begins managing subrecipients for purposes of federal transit grants.

Equity Analysis:

The Stanislaus County Public Works Transit Division has not undertaken any major construction, but will conduct equity analysis when transit amenities, new service, or new fare media is being implemented.

Requirements of Transit Providers:

The section to follow is an additional requirement from the FTA Circular 4702.1B that all fixed route transit providers must submit in addition to the general requirements section provided above. As stipulated in the FTA Circular 4702.1B: "Title 49 CFR Section 21.5 states the general prohibition of discrimination on the grounds of race, color, or national origin. Section 21.5(b)(2) specifies that a recipient shall not "utilize criteria or methods of administration which have the effect of subjecting persons to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular race, color, or national origin." Section 21.5(b)(7) requires recipients to "take affirmative action to assure that no person is excluded from participation in or denied the benefits of the program or activity on the grounds of race, color, or national origin." Finally, Appendix C to 49 CFR part 21 provides in Section (3)(iii) that "[n]o person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of service of transportation service furnished as a part of the project on the basis of race, color, or national origin. Frequency of service, age and quality of 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."

Stanislaus County Public Works Transit Division has implemented the following service standards and policies in order to be in compliance with the aforementioned regulations.

Effective Practices to Fulfill Transit Services Standards and Policies

- A. Service Policy: Information about types of services provided in StaRT's service area will include:
1. Routing for all types of services provided
 2. Scheduling of services provided and/or to be provided
 3. Quality of transit services
 4. Frequency of service
 5. Age and quality of vehicles assigned
 6. Quality of stations/bus stops serving different routes
 7. Routing and location of routes

B. Vehicle Assignment Policy:

1. Fixed Route and Deviated Fixed Route Service:
 - a. Operating characteristics of buses within the fleet
 - b. Route characteristics
2. Demand Response/Dial-A-Ride Service:
 - a. Lift capacity
 - b. Interior clearance or operating characteristics within service area
 - c. Assigned demand response trips

C. Vehicle Load Standards:

1. Intercity Fixed Route: Maximum load factor is 1.0 passenger per seat.
2. Shuttle Services: Maximum load factor is 1.0 passenger per seat.
3. Dial-A-Ride: Maximum load factor is 1.0 passenger per seat.

D. Vehicle Headway Standards:

1. Peak period headways on fixed route 10 will be 60 minutes or less Monday through Friday. The County Transit Division continues to improve headways on fixed routes, 15, 40, and 60 and anticipates improving the headways on these routes in FY 2020-2021 through FY 2022-2023.
2. Route 61 was added with peak period headways of 120 minutes Monday through Saturday.
3. Local routes such as 45-East and 45-West operate longer headways based on the distance traveled, ridership, demand, and transfer opportunities at the transfer locations for these routes.

E. On-Time Performance Standards:

1. Fixed and Intercity Deviated Fixed Routes: The County's Transit Division continues to improve on-time performance on all routes and endeavors to begin service no earlier than the scheduled time for the routes. 90% of all trips should be operated "on-time," defined as departing a bus stop no more than ten (5) minutes later than the published schedules to accommodate passengers.
2. Demand Response: Close to 90% of all monthly trips operate on time and at fifteen (15) minutes past the scheduled pick-up time, with the pick-up time as defined within the information noted on the manifest.

F. Service Availability Standards:

The Stanislaus Regional Transit (StaRT) will distribute transit service so that 75% of all residents in the service area are within a ¼ mile walk of bus services.

1. Fixed Route Service:

The County's transit system service area includes 550,660 residents per the 2019 United States Census Bureau Estimate. Of this number, the County currently serves approximately

80% of its total service area population and entails individuals who live within ¾ miles of a fixed route or live within the service areas for Dial-a-Ride service provided.

2. Demand Response:

100% of all trips requested by seniors and persons with disabilities with the County's service area are accommodated.

G. Transit Amenities Policy:

1. Applied as funding allows.
2. Installation of trash cans will be prioritized and placed at highly used bus stops.
3. Installation of bus shelters at bus stops with established average boarding.
4. Seating/benches installed at bus stops with established or threshold of passengers.
5. Prioritize installation of amenities at bus stops based on land use and activity centers.
6. Priority will be given to bus stops serving senior housing and/or activity centers.
7. Installation of printed information at shelters (signs, system maps, schedules).
8. Prioritize installation of benches and shelters in the Disadvantaged Community (DAC).

Appendix A: StaRT's Non-Discrimination Statement

STANISLAUS COUNTY PUBLIC WORKS – TRANSIT DIVISION NON-DISCRIMINATION STATEMENT

The Stanislaus County Public Works – Transit Division operates its programs, services and activities without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes that he or she has been subjected to discrimination under Title VI on the basis of race, color, or national origin may file a complaint with the Stanislaus County Public Works – Transit Division.

To receive more information on the County's Public Works Transit Division Title VI Program and the procedures to file a complaint, visit www.srt.org, contact the Transit Manager/Title VI Liaison at 209-525-4311, or visit our administrative office at 1010 10th Street, Suite 4204, Modesto, CA 95354.

OBRAS PUBLICAS DEL CONDADO DE STANISLAUS – DIVISION DE TRANSITO DECLARACIÓN DE NO DISCRIMINACIÓN

La División de Transito del Departamento de Obras Publicas del Condado de Stanislaus opera sus programas, servicios y actividades sin importar la raza, color u origen nacional de acuerdo con el Titulo VI del acta de 1964 de los derechos civiles. Cualquier persona que crea que ha sido objeto de discriminación bajo el Titulo VI por motivos de raza, color u origen nacional puede presentar una queja ante la División de Transito del Departamento de Obras Públicas del Condado de Stanislaus.

Para más información sobre el programa del Título VI de la División de Transito del Departamento de Obras Públicas del Condado de Stanislaus y sobre el procedimiento para presentar una queja, visite www.srt.org, comuníquense con el Gerente de Tránsito/Enlace del Título VI al 209-525-4311, o visítenos en nuestra oficina administrativa en el 1010 10th Street, Suite 4204, Modesto, CA 95354.

Appendix B: Complaints

Complaint Procedure

STANISLAUS COUNTY PUBLIC WORKS – TRANSIT DIVISION TITLE VI COMPLAINT PROCEDURE

Stanislaus County encourages members of the public with complaints to attempt to informally resolve those complaints with the Title VI Liaison for the individual department providing the activity, program, or service. The County grants all citizens equal access to its transportation services under Title VI. It is also the intent of the Stanislaus County Public Works Transit Division to ensure that all citizens are aware of their rights to such access.

The County is committed to ensuring that no person is excluded from participation or denied benefits of its services based on race, color, or national origin as stipulated by Title VI of the Civil Rights of 1964. To that end, the County's Public Works Transit Division will:

1. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
2. Promote fair participation in transportation decision making for all affected population.
3. Prevent the denial, reduction, or delay in benefits related to transportation services, programs, and activities that benefit minorities or low-income persons.
4. Ensure meaningful access is granted to transportation services, programs, and activities for people with limited English proficiency.

Any person who believes he or she has been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint. Any such complaint must be in writing and filed with Stanislaus County Public Works Transit Division within 180 days following the date of the alleged discriminatory occurrence.

Title VI Complaint forms are available at Stanislaus County Public Works Transit Division located at 1010 10th Street, Ste 4204 in Modesto, and online at www.srt.org.

The complaint may be submitted by mail, email, fax, or hand delivery to:

Stanislaus County Public Works Transit Division
Attn: Transit Manager/Title VI Liaison
1010 10th Street, Suite 4204
Modesto, CA 95354
Email: transitstaff@stancounty.com
Phone: (209) 525-4311
Fax: (209) 525-4332

Alternative means of submitting complaints, such as personal or telephone interviews will be made available upon request for persons with disabilities.

The Stanislaus County Public Works Transit Division will only process complaints that are complete. The following procedures will be followed to investigate formal Title VI complaints:

1. The County Public Works Transit Division will send the complainant an acknowledgement letter and begin the investigation within fifteen (15) days of receiving the complaint.
2. The investigation will be conducted and completed within sixty (60) days of the receipt of the formal complaint.
3. The Public Works Transit Division may contact the complainant if more information is needed to resolve the case. The complainant has ten (10) business days from the date of the letter to send the requested information. The case may be closed if the requested additional information is not received within ten (10) business days.
4. A case can also be administratively closed if the complainant no longer wishes to pursue their case.
5. The complainant will be notified in writing of the cause to any planned extension to the sixty (60) day rule.
6. Following the investigation, the Transit Division will issue one of the following letters to the complainant:
 - a. A Closure Letter summarizing the allegations and states that there was not a Title VI violation and that the case will be closed.
 - b. A Letter of Finding summarizing the allegations and the interviews regarding the alleged incident and explains whether any disciplinary action, additional training of staff, or other actions will occur.

If the complainant is unsatisfied with the decision, the complainant has thirty (30) days after the date of the Transit Division's "Closure Letter" or the "Letter of Finding" to submit a written appeal. Appeals need to be submitted to Stanislaus County Public Works Transit Division.

The complainant is entitled to review the denial, to present additional information and arguments, and to review separation of functions (i.e. a decision by a person not involved with the initial decision to deny eligibility). The complainant is entitled to receive written notification of the decision of the appeal and the reason for it.

If a complaint to the Public Works Transit Division is not resolved, a formal complaint may be submitted to the County's Title VI Coordinator. You can find the Complaint Procedure and Complaint Form online at www.stancounty.com/accessibility.

The complainant may also file a complaint directly with the Federal Transit Administration, as follows:

Title VI Program Coordinator - FTA Office of Civil Rights
East Building, 5th Floor – TCR,
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Title VI Complaint Form

STANISLAUS COUNTY PUBLIC WORKS – TRANSIT DIVISION
TITLE VI COMPLAINT FORM

Section I:

1. Name: _____
2. Address: _____
3. Telephone: (home) _____ (cell) _____ (message) _____
4. Email Address: _____
5. Accessible Format Requirements:
 Large Print Audio Tape TDD Other _____

Section II:

6. Are you filling this complaint on your own behalf? Yes No
- *If you answered “yes” to #6, go to in Section III _____
7. If you answered “no” to #6, what is the name of the person for whom you are filing this complaint? _____
8. What is your relationship with this individual? _____
9. Please why you have filed for a third party? _____
10. Please confirm you have obtained permission of the aggrieved party to file on their behalf.
 Yes No

Section III:

11. I believe the discrimination I experienced was based on (check all that apply)
 Race Color National Origin
12. What is the date of the alleged discrimination: (mm/dd/yyyy) _____
13. Explain what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the names and contact information of person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. Please use the back of this form if more space is needed.

Section IV:

14. Have you previously filed for a Title VI complaint with the County Transit Division?
 Yes No

Section V:

15. Have you filed this complaint with any other Federal, State, or Local agency, or with any Federal or State court? Yes No

If yes, check all that apply below:

- Federal Agency _____ State Agency _____
 Federal Court _____ Local Agency _____
 State Court _____

16. If you answered “yes” to #15, please provide information about a contact person at the agency/court where the complaint was filed.

Name: _____ Title: _____
Agency: _____
Address: _____
Telephone: _____ Email: _____

Section VI:

Name of Transit Agency complaint is against: _____
Contact Person: _____
Telephone: _____
Signature: _____ Date: _____

Please sign, date and submit this form in person or mail this form to:

Stanislaus County Public Works – Transit Division
Attn: Transit Manager
1010 10th Street, Suite 4204
Modesto, CA 95354

Complaint Procedure - Spanish

OBRAS PÚBLICAS DEL CONDADO DE STANISLAUS – DIVISIÓN DE TRÁNSITO PROCEDIMIENTOS DE QUEJAS DEL TÍTULO VI

El Condado de Stanislaus anima a los miembros del público con quejas sobre el acceso a una actividad, programa o servicio a intentar resolver informalmente sus quejas con un oficial de enlace del Título VI del departamento individual que proporciona la actividad, programa o servicio. El Condado otorga el acceso igualitario a todos los ciudadanos a todos los servicios de transporte bajo el Título VI. Es también la intención del departamento de Obras Públicas del Condado de Stanislaus asegurar que todos los ciudadanos estén conscientes sobre sus derechos a dicho acceso.

El Condado se compromete a garantizar que ninguna persona sea excluida de la participación o se le nieguen los beneficios de sus servicios por motivos de raza, color u origen nacional según lo estipulado en el Título VI de la ley de Derechos Civiles de 1964. Con ese fin, la división de transito de Obras Públicas del Condado se:

1. Asegurará de proporcionar el nivel y la calidad del servicio de transporte sin distinción de raza, color u origen nacional.
2. Promoverá una participación justa en la toma de decisiones de transporte para toda la población afectada.
3. Evitará la negación, reducción o retraso de los beneficios relacionados con los servicios, programas y actividades de transporte que benefician a las minorías o personas de bajos ingresos.
4. Asegurará que se otorgue acceso significativo a los programas, actividades y servicios de transporte a las personas con un dominio limitado del idioma inglés.

Cualquier persona que crea que ha sido agraviada por una práctica discriminatoria ilegal bajo el Título VI puede presentar una queja. Dicha queja debe presentarse por escrito y presentarse ante la División de Tránsito de Obras Públicas del Condado de Stanislaus dentro de los 180 días posteriores a la fecha del supuesto hecho discriminatorio.

Los formularios de queja del Título VI están disponibles en la División de Transito de Obras Publicas del Condado de Stanislaus ubicada en el 1010 10th Street, Ste 4204 en Modesto, y en línea en www.srt.org. La queja se puede enviar por correo, correo electrónico, fax o mano entrega a:

Stanislaus County Public Works Transit División
Attn: Transit Manager/Title VI Liaison
1010 10th Street, Suite 4204
Modesto, CA 95354
Correo Electrónico: transitstaff@stancounty.com
Teléfono: 209-525-4311 Fax: 209-525-4332

Medios alternativos para presentar quejas, como entrevistas personales o telefónicas, estarán disponibles por solicitud previa para personas con discapacidades.

La División de Transito de Obras Publicas del Condado de Stanislaus solo procesara las quejas que estén completas. Se seguirán los siguientes procedimientos para investigar las quejas formales del Título VI:

1. La División de Transito de Obras Publicas del Condado enviara al demandante una carta de reconocimiento y comenzara la investigación dentro de los quince (15) días posteriores a la recepción de la queja.
2. La investigación se llevará a cabo y se completará dentro de los sesenta (60) días posteriores a la recepción de la queja formal.
3. La División de Transito de Obras Publicas puede contactar al demandante si se necesita más información para resolver el caso. El demandante tiene diez (10) días hábiles a partir de la fecha de la carta para enviar la información solicitada. El caso puede cerrarse si la información adicional solicitada no se recibe dentro de los diez (10) días hábiles.
4. Un caso también puede cerrarse administrativamente si el demandante ya no desea continuar con su caso.
5. El demandante será notificado por escrito de la causa de cualquier extensión planificada a la regla de sesenta (60) días.
6. Después de la investigación, la División de Transito emitirá una de las siguientes cartas al demandante:
 - a. Una carta de cierre que resume las acusaciones y establece que no hubo una violación del Título VI y que el caso se cerrara.
 - b. Una carta que resume las acusaciones y las entrevistas con respecto al presunto incidente y explica si se producirá alguna acción disciplinaria, capacitación adicional del personal u otras acciones.

Si el demandante no está satisfecho con la decisión, tiene treinta (30) días después de la fecha de la carta de la División de Transito para presentar una apelación por escrito. Las apelaciones deben presentarse a la División de Transito de Obras Publicas del Condado de Stanislaus.

El demandante tiene derecho a revisar la negación, presentar información y argumentos adicionales, y revisar la separación de funciones (es decir, una decisión de una persona que no está involucrada en la decisión inicial de negar la elegibilidad). El demandante tiene derecho a recibir una notificación por escrito de la decisión de la apelación y la razón de esta.

Si no se resuelve una queja ante la División de Transito de Obras Públicas, se puede presentar una queja formal ante el Coordinador del Título VI del Condado. Puede encontrar el procedimiento de queja y el formulario de queja en línea en www.stancounty.com/accessibility.

El demandante también puede presentar una queja directamente con la administración Federal de Transito, de la siguiente manera:

Title VI Program Coordinator - FTA Office of Civil Rights
East Building, 5th Floor – TCR,
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

14. ¿Ha presentado anteriormente una queja con la División de Tránsito del Título VI del Condado de Stanislaus? Sí No

Sección V:

15. ¿Ha presentado esta queja en cualquier otra agencia federal o estatal, local, o tribunal federal o estatal? Sí No

Si contestó sí a la pregunta anterior, por favor marque todas las opciones siguientes que apliquen:
Agencia Federal Agencia Estatal Tribunal Federal Agencia Local Tribunal Estatal

16. Si contestó "sí" a la pregunta #15, por favor escriba en el espacio siguiente el nombre de la persona que le ayudó en la agencia, información de contacto y domicilio de la agencia o tribunal donde Usted presentó su queja.

Nombre: _____ Título: _____
Agencia: _____
Domicilio: _____
Teléfono: _____ Correo electrónico: _____

Sección VI:

Nombre de la agencia a la que usted está denunciando: _____
Persona de Contacto: _____
Teléfono: _____

Por favor firme a continuación y adjunte al formulario cualquier información escrita o cualquier otra información relacionada con su queja. Para que este formulario sea considerado completo, por favor firme y feche el formulario.

Firma: _____ Fecha: _____

Por favor entregue este formulario en persona o por correo al siguiente domicilio:

Stanislaus County Public Works – Transit División
Attn: Transit Manager
1010 10th Street, Suite 4204
Modesto, CA 95354

List of Transit Related Title VI Investigations, Complaints and Lawsuits

Complaint Date	Summary of Incident	Action Taken	Final Finding
4/3/17	Passenger was upset that another passenger was saying racial slurs. According to passenger, the other passenger appeared to be irritated that it took so long to board her and her wheelchair.	The driver gave the passenger saying racial slurs a warning.	The Driver handled the situation professionally
12/1/17	Passenger called to let us know that our driver is racist. According to passenger, the driver consistently overcharges her, and today, she missed the bus.	Reviewed incident with driver and reviewed the recorded footage.	No verifiable Title VI Infraction
6/28/18	Passenger called to let us know that the driver discriminated against her. According to passenger, our Driver discriminated her because she is African American. She states the driver yelled at her child and does not understand why.	Safety Officer reviewed the recorded footage and was able to determine the driver was always professional.	No verifiable Title VI Infraction
7/31/18	Passengers' mom states that her children were attempting to board the bus at the Patterson City Park, but the driver would not let them on. According to her, her children were discriminated against because they are Hispanic.	Reviewed incident with driver and reviewed the recorded footage.	No verifiable Title VI Infraction
8/29/18	Passenger states that she should not be reprimanded for using pennies which is valid currency and that this is the second time this has happened. Passenger felt discriminated against as a "Latina".	Management met with Driver.	Apologized and let passenger know that this would not happen again.

Stanislaus County Public Works Transit Division Language Assistance Plan

Introduction

This Language Assistance Plan was developed during the process of preparing Stanislaus County Transit Title VI Program to ensure that StaRT services are accessible to limited English proficient individuals. Language of LEP individuals can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally funded programs and activities. As a recipient of FTA funds, Stanislaus County Transit is obligated to reduce language barriers that can preclude meaningful access by LEP persons to transit services.

Title VI of the 1964 Civil Right Act is one of two federal mandates that guarantee the provision of meaningful access to federally funded services for LEP individuals:

- Title VI of the 1964 Civil Right Act prohibits federally funded agencies from discriminating against individuals based on race, color, and national origin and includes meaningful access to LEP customers.
- President’s Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” (August 11, 2000): Instructs federal agencies to improve access to services by mandating that any federally conducted or assisted programs of activities (e.g. recipients of federal funding) must provide meaningful access to LEP customers.

StaRT’s Title VI Program was prepared in 2014 in accordance with the FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, October 1, 2012.

Factor Analysis

In Order to ensure meaningful access to programs and services, the Stanislaus County Transit has used information obtained through Four Factor Analysis to determine the specific language services that are appropriate to provide. The analysis reveals how the agency can improve communicated with Limited English Proficient (LEP) individuals. Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English, can be Limited English Proficient (LEP) and, therefore, are entitled to language assistance under Executive Order 13166 and Title VI of the Civil Rights Act of 1964.

This LEP Plan was developed to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided. As defined by Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available. In order to prepare this plan, Stanislaus County Transit used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by StaRT.
2. The frequency with which LEP persons come in contact with StaRT services.
3. The nature and importance of services provided by StaRT to LEP population.
4. The resources available to the County’s Public Works Transit Division and overall cost to provide LEP assistance.

FACTOR 1:

The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.

A review of the U. S Census Bureau Data 2010-2018 American Community Survey of Language Spoken at Home estimates that of the 511,287 Stanislaus County residents aged five years and older, 169,364 or 33.1% speak Spanish at home. This places Spanish as the second highest spoken language in Stanislaus County following English. Of the total population 5 years and older, 72,034 or 14.1% speak English less than “very well” at home. The chart below depicts the percent of the population in Stanislaus County that likely speaks English less than “very well”.

STANISLAUS COUNTY LEP RESIDENTS ABILITY TO SPEAK ENGLISH

Stanislaus County, California Language Spoken at Home	Estimates	Percentage %
Speak Only English	294,810	57.7%
Spanish	169,364	33.1%
Other Indo-European Language	23,750	4.6%
Asian and Pacific Island Languages	14,882	2.9%
Other Languages	8,481	1.7%
Total Population 5+ years old:	511,287	100%
Speak English Less Than “Very Well”	72,034	14.1%

The Stanislaus County Public Works Transit Division does not track annual expenditures and authorized services by primary language spoken. However, as previously indicated, Spanish is consistently the primary language for LEP populations.

FACTOR 2:**The frequency with which LEP persons come into contact with SRTA services, programs, or activities.**

StaRT continually assesses the frequency at which staff and drivers encounter LEP persons through transit services, programs, and activities provided to residents of Stanislaus County. An analysis of the Census data indicates the predominant language spoken at home other than English is Spanish. StaRT averages about 15 calls a day that require translations and has no calls for other languages other than Spanish. The County's Transit Division has access to bilingual staff that speak and translate Spanish fluently in person or over the phone to LEP persons.

FACTOR 3:**The nature and importance of programs, activities or services provided by SRTA to the LEP population.**

Stanislaus County Transit provides important transit services to the public through its fixed route, inner city dial-a-ride, inter-city shuttles, and paratransit services. Stanislaus County Transit is the primary resource for transit dependent individuals for daily life tasks such as medical appointments, shopping, and commuting to school and work.

FACTOR 4:**The resources available and overall costs to provide LEP assistance.**

Stanislaus County Transit currently provides almost all information in Spanish, including the Ride Guide, applications, information brochures, and all route or schedule changes. Both Storer and StaRT have bilingual staff providing verbal assistance to LEP individuals who may also have limited reading skills in their native language. Stanislaus County Transit utilizes county staffing for document translation services and consolidates printing orders whenever possible.

Stanislaus County Transit is committed to making its services and programs available to LEP persons and recognizes the need to continue providing language services in Stanislaus County. Stanislaus County Transit is committed to continuing the following practices:

- Providing customer services staff members who are bi-lingual and are trained to assist persons with limited English language proficiency
- Providing bi-lingual customer service representatives to assist Spanish speaking riders
- In addition, Stanislaus County Transit works with community organizations to determine other areas of need and coordinate with other agencies to reach any additional LEP populations.
- To support infrequent language support needs other than Spanish, Stanislaus County Transit has access to a Language Line which can provide real time phone translation services in many languages.

The County's Transit Division recognizes the need to provide language services and currently translates all relevant related documents into Spanish for LEP persons in Stanislaus County including, but not limited to following documents:

- Application for Senior/Disabled Discount Card
- Service Announcements (Route/Schedule/Fare, etc.)
- Title VI Complaint Procedures
- StaRT Ride Guide
- Bike and Ride Brochure
- Medivan Service Brochure
- StaRT ADA Paratransit Service Brochure

Stanislaus County Transit Division Website

1. All translated vital documents will be posted on the County Transit Division's website on their respective pages.
2. The County Transit Division's website uses Google Translate which enables the user to choose the desired language.

Appendix D: Stanislaus County Board of Supervisors Approval of Title VI Plan

ADD BOARD APPROVAL

Appendix E: Stanislaus County Regional Transit Map

