

MENDOCINO TRANSIT AUTHORITY

RESOLUTION #2020-09

**RESOLUTION OF THE MENDOCINO TRANSIT AUTHORITY BOARD OF DIRECTORS
UPDATING THE MENDOCINO TRANSIT AUTHORITY TITLE VI NONDISCRIMINATION
POLICY**

WHEREAS, a condition of Federal financial assistance is that a recipient must comply with Title V of the Civil Rights Act of 1964 and the provisions of the applicable Code of Federal Regulations and Executive Orders related there to; and

WHEREAS, Title VI of the Civil Rights Act of 1964, applicable Code of Federal Regulations, and Executive Orders related thereto provide that no person in the United States shall, on the grounds of race, color or national origin be excluded from participating in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which a recipient receives Federal financial assistance; and

WHEREAS, Mendocino Transit Authority has been, currently is and will continue to be a future recipient of Federal financial assistance.

NOW THEREFORE, BE IT RESOLVED that Mendocino Transit Authority Board of Directors approves the 2020 Mendocino Transit Authority Title VI plan and shall be consistent with and in compliance with the requirements said plan.

ADOPTED THIS 29TH DAY OF JULY 2020

AYES:

NOES:

ABSENT:

ABSTAIN:

IN WITNESS WHEREOF, I have hereunto set my hand this 29th day of July 2020

SAPRINA RODRIGUEZ, CHAIRPERSON OF THE BOARD.



Meeting Date: July 29, 2020

Agenda Item: # D.3

SUBJECT:

TITLE VI PLAN: Three-Year Update

SUMMARY:

The U.S. Department of Transportation (Department or DOT) distributes substantial Federal financial assistance each year for thousands of programs and activities (programs) conducted by diverse entities, including but not limited to State and local governments. Federal law requires entities receiving this assistance to provide all communities with equal access to these programs. Specifically, Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. § 2000d et seq., and DOT Title VI regulations at 49 CFR Part 21 are designed to ensure that no person in the United States, based on race, color, or national origin, is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any program that DOT financially assists. Equal access helps to create opportunity and connect all persons and communities to transportation programs that are financially assisted by DOT regardless of race, color, or national origin.

MTA is required to update this plan every three years and submit to CalTRANS for approval. Because we are still operating under the US Census Data from 2010, the only changes required are updates on Board Members and On-Time Performance. You will note that with the addition of the Costco STOP and a significant increase in mobility device loadings, on-time performance has dropped for FY 18/19 and FY 19/20. Pre COVID, the MTA Route Committee was working on a plan to increase on-time performance and will reconvene when appropriate.

The Title VI plan update in FY2023 will be based on the 2020 US Census, so will undoubtedly reflect changes in LEP persons and nationality of origin statistics.

STAFF RECOMMENDATION:

Review, approve and adopt Resolution 2020-09 Update to the MTA Title VI Plan

ATTACHMENTS:

Title VI Plan
Complaint Forms, English and Spanish



Mendocino Transit Authority

Title VI Program

As approved and Adopted by the Board of Directors on June 26, 2014
Revised and Updated April 26, 2017
Revised and Updated July 29, 2020

Prepared by: Mendocino Transit Authority
241 Plant Road
Ukiah, CA 95482
Phone: 707-462-5765

Adopted: July 29, 2020
Approved by Caltrans:

Title VI Program

Mendocino Transit Authority

2020 Board of Directors

| | |
|---------------------|---|
| Chair: | Saprina Rodrigues, Willits City Council |
| Vice Chair: | Jim Tarbell, Mendocino County Board of Supervisors, County A |
| | Tess Albin-Smith, Fort Bragg City Council |
| | Lloyd Cross, Point Arena City Council |
| | Dan Gjerde, Mendocino County Board of Supervisors, County C |
| | Bruce Richard, Mendocino County Board of Supervisors, County B |
| | Maureen Mulheren, Ukiah City Council |
| Executive Director: | Carla Meyer, Mendocino Transit Authority |

Mission Statement *To provide safe, courteous, reliable, affordable and carbon-neutral transportation service.*

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Introduction

This program reflects the Mendocino Transit Authority's (MTA) commitment to ensuring that no person shall, on the ground 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 provided by MTA. All persons, regardless of their citizenship, are covered under this regulation. In addition, Mendocino Transit Authority prohibits discrimination on the basis of race, color or national origin in its employment and business opportunities.

Policy Statement

A policy statement, assuring Mendocino Transit Authority's compliance with Title VI of the Civil Rights Act of 1964 can be found as **Attachment A**.

The Mendocino Transit Authority (MTA) is committed to ensuring that no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any of its programs, activities, or services on the basis of race, color or national origin. All persons, regardless of their citizenship, are covered under this regulation. In addition, MTA prohibits discrimination on the basis of race, color, or national origin in its employment and business opportunities.

The Mendocino Transit Authority will not condone retaliation against an individual for their involvement in asserting their rights pursuant to Title VI or because they filed a complaint or participated in an investigation under the Title VI, and/or this regulation.

As a Federal Transit Administration (FTA) fund recipient, MTA will ensure that its programs, policies, and activities comply with the Department of Transportation (DOT) Title VI Regulations of the Civil Rights Act of 1964.

Mendocino Transit Authority will ensure that the level and quality of its transportation service is provided without regard to race, color, or national origin.

Mendocino Transit Authority will promote the full and fair participation of all affected populations in the transportation decision-making process.

Mendocino Transit Authority will make good faith efforts to achieve environmental justice as part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, activities, and services on minority populations and low-income populations within Mendocino Transit Authority's service area as provided herein.

Mendocino Transit Authority will ensure that Limited English Proficient (LEP) individuals have access to Mendocino Transit's programs, activities, and services.

The Mendocino Transit Authority's Title VI will be posted on the agency website, within the administrative offices, within vehicles, and at high demand stops throughout the system.

This Regulation shall be maintained in English and Spanish.

Title VI Procedures for Handling Complaints

The MTA has a standard process for investigating all complaints. Full procedures for filing a complaint and MTA's procedures for investigating complaints can be found as **Attachment B**.

The complaint may be filed in writing with Mendocino Transit Authority at the following address:

Mendocino Transit Authority
Executive Director
241 Plant Road
Ukiah, CA 95482
By Phone: 707-462-5765
By Facsimile: 707-462-1760
Email: admin@mendocinotransit.org

Record of Title VI investigations, complaints, or lawsuits

Over the reporting period, Mendocino Transit Authority had no Title VI complaints, investigations or lawsuits filed against it.

Mendocino Transit Authority Limited English Proficiency Outreach Plan

A full copy of MTA's outreach plan for individuals with limited English proficiency can be found in **Attachment C**. Key elements of the plan include:

- Spanish speaking translators are available during normal business hours Monday through Friday.
- Public Timetables are available in both English and Spanish.
- Public Timetables and system information is available in Spanish on the MTA's website.
- Transit surveys conducted by MTA are provided in Spanish as well as English.
- Latino outreach meetings/forums are conducted regularly within the Spanish speaking community in the County. Information is provided in Spanish and when needed, translators are on site to help with questions or concerns.

Mendocino Transit Authority Safe Harbor Provision

Mendocino Transit Authority will comply with the Safe Harbor Provision which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations.

Census Bureau Language Identification Cards are carried by all Transit Operators and utilized for identification of individuals needing translation of written documents in their language. In addition, the Identification Cards are available at all public meetings, Board of Directors Meeting and the MTA main Administration office at 241 Plant Road. Any cards received will be provided to Administration for follow-up contact.

Notification of Mendocino Transit Authority Title VI obligations

Mendocino Transit Authority publicizes its Title VI program by posting its commitment to providing services without regard to race, color, or national origin in all buses, MTA offices, on the website, and high demand stops throughout the system.

The postings include the following statements:

- Mendocino Transit Authority does not discriminate in the operation of its programs on the basis of race, color, or national origin.
- Please contact MTA's Executive Director with questions or comments about MTA's non-discrimination policies, to get additional information, or to file a complaint.

In person or by mail:

Executive Director

241 Plant Road
Ukiah, CA 95482

Email address: admin@mendocinotransit.org

By Phone: 707-462-5765

By Facsimile: 707-462-1760

Website: www.mendocinotransit.org

Summary of Public Participation Efforts

Over the last reporting period, MTA conducted the following public outreach and involvement activities:

Public Timetables:

All public timetables always include Spanish sections and are available on the MTA website.

General Awareness and Phone Surveys:

We conduct onboard rider and general awareness surveys frequently. A Countywide Transit Ridership Survey was conducted in the Summer of 2019 to determine ridership demographics, usage habits, trip characteristics, and customer satisfaction. In addition, a telephone survey was conducted to garner information from the public regarding their perceptions of public transportation and the MTA, and to gather information that will be used to develop new services. These surveys are provided in both English and Spanish. Additionally, they are posted on MTA's website. As with all grant projects, MTA aggressively pursues participation from the Latino community. For further details, see the Implementation Plan on pages 15-16.

Bilingual Outreach:

MTA's bilingual receptionist provides Spanish-speaking guests with information on public transit services in Spanish. Bilingual assistance is utilized in outreach programs when needed and appropriate. Additionally, MTA conducts on-going advertising in all Latino publications available in the County and on Latino radio stations.

Phone Access:

Our phone system currently includes a Spanish option on the MTA's recorded greeting. A bilingual receptionist is available to answer phone inquiries for Spanish speaking customers during business hours. After business hours inquiries can be left on the bilingual voice mail and are responded to promptly the next business day.

Short Range Transit Development Plan (SRTDP):

MTA conducts a SRTDP every five years. The next plan is to be updated in FY 20/21. Latino agencies, and influential members of the Latino community are major stakeholders from which feed-back and input on MTA services have been solicited.

NOTICE

Notifying the Public of Rights under the Title VI

Mendocino Transit Authority (MTA) operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act. Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Mendocino Transit Authority.

For more information on Mendocino Transit Authority's civil rights program, and the procedures to file a complaint, contact (707)462-1422; website www.mendocinotransit.org; or visit the administrative offices at 241 Plant Road, Ukiah, CA 95482.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave. SE, Washington DC 20590.

If information is needed in another language, contact (707) 462-1422 for assistance. Si require information en otro idioma, llame a (707) 462-1422..

MENDOCINO TRANSIT AUTHORITY

ATTACHMENT 'A'

TITLE VI NON-DISCRIMINATION POLICY STATEMENT

July 1, 2020

Pursuant to Title VI of the Civil Rights Act of 1964:

It is the policy of the Mendocino Transit Authority that no person in the United States shall, on the grounds 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. All persons, regardless of their citizenship, are covered under this regulation. In addition, Mendocino Transit Authority prohibits discrimination on the basis of race, color, or national origin in its employment and business opportunities.

As a Federal Transit Administration (FTA) fund recipient, Mendocino Transit Authority will ensure that its programs, policies, and activities comply with the Department of Transportation (DOT) Title VI Regulations of the Civil Rights Act of 1964.

Mendocino Transit Authority will ensure that the level and quality of its transportation service is provided without regard to race, color, or national origin.

Mendocino Transit Authority will ensure that Limited English Proficient (LEP) individuals have access to Mendocino Transit Authority's programs, activities, and services.

To request additional information on Mendocino Transit's non-discrimination obligations or to file a Title VI complaint, please submit your request or complaint in writing to:

Mendocino Transit Authority

Attn: Executive Director
241 Plant Road
Ukiah, CA 95482

Complaint forms can also be obtained at www.mendocinotransit.org

Federal Transit Administration (FTA) Title VI complaints may be filed directly to:

Federal Transit Administration Office of Civil Rights
Title VI Program Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

Attachment B

Discrimination Procedure for Handling Complaints

1. Any person who believes that he or she, individually, as a member of any specific class, or in connection with any disadvantaged business enterprise, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, the American with Disabilities Act of 1990, Section 504 of the Vocational Rehabilitation Act of 1973 and the Civil Rights Restoration Act of 1987, as amended, may file a complaint with Mendocino Transit Authority. A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to the Human Resources Manager for review and action.
2. In order to have the complaint considered under this procedure, the complainant must file the complaint no later than 180 days after:
 - a) The date of alleged act of discrimination; or
 - b) Where there has been a continuing course of conduct, the date on which that conduct was discontinued.

In either case, Mendocino Transit Authority may extend the time for filing or waive the time limit in the interest of justice, as long Mendocino Transit Authority specifies in writing the reason for so doing.

3. Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints shall set forth as fully as possible the facts and circumstances surrounding the alleged discrimination. In the event that a person makes a verbal complaint of discrimination to an officer or employee of Mendocino Transit, the person shall be told to put this in writing, or given help by referring to the appropriate agency for assistance. The complaint shall then be handled according to Mendocino Transit's investigative procedures.
4. Within 10 working days of receipt of the written complaint, the Human Resources Manager will acknowledge receipt of the allegation, inform the complainant of action taken or proposed action to process the allegation, and advise the complainant of other avenues of redress available, such as STATEDOT and USDOT.
5. Mendocino Transit Authority will advise STATEDOT and/or USDOT within 10 days of receipt of the allegations. Generally, the following information will be included in every notification to STATEDOT and/or USDOT:
 - a) Name, address, and phone number of the complainant.
 - b) Name(s) and address(es) of alleged discriminating employee or official(s).
 - c) Basis of complaint (i.e., race, color, national origin or sex)
 - d) Date of alleged discriminatory act(s).
 - e) Date of complaint received by the recipient.
 - f) A statement of the complaint.
 - g) Other agencies (state, local or Federal) where the complaint has been filed (if known).
 - h) An explanation of the actions Mendocino Transit Authority has taken or proposed to resolve the issue in the complaint.

6. Within 60 calendar days of the receipt of the complaint, the Human Resources Manager will conduct an investigation of the allegation. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, the Authority can administratively close the case. The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report of findings. A case can be administratively closed also if the complainant no longer wishes to pursue their case.
7. Based on the information obtained, the Human Resources Manager will render a recommendation for action in a report of findings to the Executive Director.
8. Within 90 calendar days of receipt of the complaint, the Executive Director will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The complainant will be issued one of two letters: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there is not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. The notification will advise the complainant of his/her appeal rights with STATEDOT, or USDOT, if they are dissatisfied with the final decision rendered by Mendocino Transit. The Human Resources Manager will also provide STATEDOT and/or USDOT with a copy of this decision and summary of findings upon completion of the investigation.
9. A person may also file a complaint directly with the Federal Transit Administration or the State Department of Transportation at the following addresses:

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590

California Department of Transportation
Civil Rights, Equal Employment Opportunity Program
Discrimination Complaint Investigation Unit
1823 14th Street, MS-79
Sacramento, CA 95811

**Mendocino Transit Authority
TITLE VI DISCRIMINATION COMPLAINT FORM
241 Plant Road, Ukiah, CA 95482**

Complainant's Name: _____
Street Address: _____
City/State/Zip: _____
Phone: _____ E-Mail Address: _____
Date of Violation: _____ Time of Violation: _____
Date of Complaint: _____ Place of Violation: _____
Bus Number: _____ Bus Route: _____

Discrimination because of: Race Color National Origin

Please provide the name(s) of the Mendocino Transit Authority employees who allegedly discriminated against you, including their job titles (if known).

Identify what Mendocino Transit service, program, or activity did not comply with Title VI of the Civil Rights Act of 1964.

Identify individuals by name, address, and phone number that has information relating to the violation.

Explain as clearly as possible what happened, how you feel you were discriminated against, and who was involved. Please include how other individuals were treated differently from you.

Signature of Complainant: _____ Date: _____

Mendocino Transit Authority
(de Transporte del Condado Mendocino)
FORMULARIO DE QUEJA POR DISCRIMINACIÓN CONFORME AL
TÍTULO VI
241 Plant Road, Ukiah, CA 95482

Nombre del que presenta la queja: _____
Dirección (calle): _____
Ciudad/Estado/Código postal: _____
Teléfono: Correo electrónico: _____
Fecha del incidente: _____ Hora del incidente: _____
Fecha de la queja: _____ Lugar del incidente: _____
Número del bus: _____ Ruta del bus: _____

Causa de la discriminación: Raza Color Origen nacional

Sírvase suministrar el/los nombre(s) de los empleados de Mendocino Transit que supuestamente le discriminaron, inclusive los cargos que ocupan (si se saben).

Identifique cuál servicio, programa o actividad de Mendocino Transit no cumplió con el Título VI del Acta de Derechos Civiles de 1964.

Proporcione los nombres, direcciones y números de teléfono de los individuos que poseen información relacionada con el incidente.

Explique lo más claramente posible lo que ocurrió, cómo usted siente que le discriminaron y quién estuvo involucrado. Por favor incluya cómo otras personas fueron tratadas de manera diferente a usted.

Firma del que presenta la queja: _____ *Fecha:* _____

Attachment C

MENDOCINO TRANSIT AUTHORITY LIMITED ENGLISH PROFICIENT (LEP) PLAN July, 2020

Mendocino Transit Authority is required to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of our programs and activities of individuals who are Limited English Proficient (LEP). Mendocino Transit Authority consulted the USDOT's LEP Guidance and performed a four factor analysis of our contact with the public to determine the appropriate mix of LEP services to offer.

Four Factor Analysis:

1) The number or proportion of LEP persons in the service area

Mendocino Transit Authority provides important transit services to the public through its fixed route, paratransit, Senior Center subsidy, vanpool, and rideshare programs. Mendocino Transit Authority is a Joint Powers Authority and is the only public transportation provider in the county and provides a link between the rural areas and the four incorporated cities which offers shopping, healthcare and other services the public accesses frequently.

Data was gathered from the US Census Language Survey Report to identify information on persons who do speak languages other than English at home, and who speak it less than well or not at all, and would be classified as limited English proficient or "LEP".

A review of the census data on the numbers of limited English proficient or LEP persons revealed that in Mendocino County, CA the highest percentage of total population 5 years and over that spoke a language other than English at home and who speak it less than very well were Spanish speakers. According to the U.S. Census Bureau, 2011-2015 American Community Survey, there are 14,598 Latinos living in the County, or 17.7% of the total population of 82,476 residents. The remaining 2,604 respondents speak approximately 33 different languages other than English at home, and who speak it less than very well, each accounting for less than 1% of the population.

2) The frequency with which LEP individuals come into contact with the service.

We serve LEP persons daily via our fixed route, paratransit, Senior Center subsidy, vanpool and rideshare programs. The most frequent contact between LEP persons is with bus drivers and administrative staff. The Bilingual Receptionist in our administrative offices speaks Spanish and translates in person or over the phone a total of approximately 7 times a day. We have an average of 3 calls a day that require translations when Spanish speaking employees are unavailable and had no calls for languages other than Spanish. Voice mail is available and staff responds the next business day to any and all messages left there. Dispatch staff only indicate taking between 2-3 calls per day. Based on this information, Mendocino Transit will continue to incorporate bilingual staff as much as practicable and ensure that language assistance information is posted in high volume areas, such as; buses, Bus shelters, website and administrative offices.

3) The nature and importance of programs, activities or services provided by Mendocino Transit to the LEP population.

The largest geographic concentration of LEP individuals in the Mendocino Transit service area is Spanish. Three (3) concentrated areas have been identified as having significant percentages of the population identified as Hispanic, they are: Ukiah (40.8%), Fort Bragg (16.2%), and Willits (7.9%). Services provided by Mendocino Transit that are most likely to encounter LEP individuals are the fixed route system which serves the general public and the demand-response (Dial-A-Ride) system which serves primarily senior and disabled persons.

It is also likely that Mendocino Transit will encounter LEP individuals at the MTA office, where passes are sold, and community outreach events are displayed related to transit events.

4) The resources available to the recipient of the federal funds to assure meaningful access to the service by LEP persons

Mendocino Transit Authority currently provides some information in Spanish such as surveys, bus routes and fares, public service announcements and information on the buses. Mendocino Transit Authority has four (8%) of experienced staff members who are fluent in both Spanish and English.

Implementation Plan:

Based on the four factor analysis, Mendocino Transit Authority recognizes the need to continue providing language services in the region. A review of Mendocino Transit Authority relevant programs, activities and services that are being offered or will continue to be offered by the Mendocino Transit Authority as of July 2020 include:

- Spanish speaking translators are available during normal business hours.
- Public Timetables are available in both English and Spanish.
- Route and schedule information available in Spanish on the Mendocino Transit Authority website.
- Transit surveys conducted by Mendocino Transit Authority available in Spanish.
- Latino outreach meetings/forums are regularly conducted in the County to inform the Latino community of the services offered by MTA. Information provided by bilingual staff on site to answer any questions or address concerns.
- Have Census Bureau Language Identification Flashcards available at Mendocino Transit Authority's meetings to assist in identifying language assistance needs for future meetings.
- Have Census Bureau Language Identification Flashcards on all transit vehicles to assist operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to try to obtain contact information to give Mendocino Transit Authority management for follow-up.
- Vehicle operators, dispatchers, and other front line staff will be surveyed on their experience concerning any contacts with LEP persons during the previous year.
- Placement of statements in notices and publications that interpreter services are available for these meetings, with seven (7) day advance notice.
- Post the Mendocino Transit Authority Title VI Program and LEP Plan on the agency website, www.mendocinotransit.org and at the administrative offices.
- When an interpreter is needed, for a language other than Spanish, in person or on the telephone, staff will utilize a professional interpreter service.

Mendocino Transit Authority's outreach and marketing initiatives has yielded a list of community organizations that serve populations with limited English proficiency. The following list of

community organizations, school systems, and religious organizations will be contacted to assist in gathering information and see what services are most frequently sought by the LEP population:

Nuestra Casa
South Valley High School
Nuestra Alianza
Migrant Education
Ukiah Unified School District
Safe Passage Family Resource Centers

Mendocino Transit Authority will contact the community organizations that serve LEP persons, as well as LEP persons themselves, and perform a four factor analysis every three years to identify what, if any, additional information or activities might better improve MTA's services to assure non-discriminatory service to LEP persons. Mendocino Transit Authority will then evaluate the projected financial and personnel needed to provide the requested services and assess which of these can be provided cost-effectively.

Staff Training:

The following training will be provided to Mendocino Transit Authority staff:

- Information on the Mendocino Transit Authority's Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of Language Identification Flashcards (used to identify language preference)
- Documentation of language assistance requests.
- Use of professional interpreter services (over the phone interpretation provider)
- How to handle a potential Title VI/LEP complaint

Outreach Techniques:

In order to ensure that LEP individuals are aware of Mendocino Transit Authority's language assistance measures, MTA provides the following:

- Local schedules include Spanish translation
- Spanish language contact information, phone and email, is posted on Mendocino Transit Authority's website home page
- Bilingual staff are present during regular business hours for in-person or phone customer service at the administrative office.

Additionally, when staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed and posted in an alternative language based on the known LEP population. These notices will be posted in the following locations:

- Mendocino Transit Authority Administrative offices
 - Mendocino Transit Bus Shelters
- Mendocino Transit Authority buses
- Mendocino Transit Authority website (www.mendocinotransit.org)

Such notices may also be posted or announced with local stakeholders, community centers, and effected route major transfer points. Interpreters will be available as needed.

Monitoring and updating the LEP Plan:

Mendocino Transit Authority will update the LEP plan as required by US DOT. At a minimum, the plan will be reviewed and updated every three (3) years in conjunction with the Title VI submission, or when data from the 2020 US Census is available, or when it is clear that higher concentrations of LEP individuals are present in the Mendocino Transit Authority service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determination as to whether the need for translation services has changed
- Determine whether local language assistance programs have been effective and sufficient to meet the need
- Determine whether Mendocino Transit Authority's financial resources are sufficient to fund language assistance resources needed
- Determine whether Mendocino Transit Authority has fully complied with the goals of this LEP Plan
- Determine whether complaints have been received concerning Mendocino Transit Authority's failure to meet the needs of LEP individuals

Dissemination of the Mendocino Transit Authority LEP Plan:

A link to the Mendocino Transit Authority LEP Plan and the Title VI Program is posted on the Mendocino Transit Authority website at www.mendocinotransit.org.

Any person or agency with internet access will be able to access and download the plan from the Mendocino Transit Authority's website. Alternatively, any person or agency may request a copy of the plan via telephone, mail or in person and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation which Mendocino Transit Authority will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to:

Mendocino Transit Authority
Executive Director
241 Plant Road
Ukiah, CA 95482
Phone: 707-462-5765
Toll Free: 800-696-4682
Fax: 707-462-1760
Email: admin@mendocinotransit.org

Attachment D

Mendocino Transit Authority Fare and Service Change Public Notification

Mendocino Transit Authority (MTA) shall maintain an open and participative process including the consideration of public comment before a fare increase or major service reduction. Public input is solicited while proposals are under consideration. Customers are notified before the implementation of any major service changes or fare increases.

It is the intent of Mendocino Transit to comply with the Federal Public Comment on Service Change and Fare Change policy cited in the Federal Transit Administration Section C.9030.1C.

For the purpose of the FTA C.9030.1C comment requirement, Mendocino Transit Authority's definition of a service change is as follows:

Service Change. A change in the service area equal to more than 25% total system square mile service area.

Fare Change. A change of any amount compared to existing fare.

In order to insure maximum opportunity for community input and involvement in the decision-making process, Mendocino Transit Authority adheres to the following:

1. Provide a thirty (30) day advance notice of a public hearing to consider the proposal in appropriate local and/regional publications as appropriate.
2. Provide customer information regarding the fare change and/or service reduction proposal and process for public comment on board service vehicles.
3. Conduct at least one (1) formal public hearing to solicit public input and consider recommendations to the proposed service changes. The hearing includes a staff presentation of proposed service changes and the opportunity for testimony from any interested individual in attendance. Minutes of the hearing are recorded.
4. Following the conclusion of the Public Hearing, the Mendocino Transit Authority Board of Directors will consider both the staff recommendations and the public comment, and make the final decision regarding the service change by a simple majority vote. The effective date of any service change shall be at least sixty (60) days after the date noticing the public hearing.

Attachment E

Mendocino Transit Authority Table Depicting the Membership of Non-Elected Committees and Councils

The Mendocino Transit Authority does not have any non-elected committees and councils at this time.

Attachment F

Mendocino Transit Authority Subrecipient Assistance and Monitoring

The Mendocino Transit Authority does not pass any FTA funding to subrecipients at this time.

Attachment G

Mendocino Transit Authority Equity Analysis - Environmental Justice

MTA has had no facility construction.

Attachment H

Mendocino Transit Authority System Performance Standards

Mendocino Transit Authority currently reports the following Transit Development Act (TDA) mandated Key Performance Measures:

Passenger Fares
Operating Expenses
Farebox Recovery Ratio (FBR)
Operating Cost/Passenger
Operating Cost/Revenue Hour
Operating Cost/Revenue Mile
Passenger Trips/Revenue Hour
Road Calls
Average Fare Per Passenger
Employees/Full-Time Equivalent (FTE)

Vehicle Load Standards by Mode

There are 43 vehicles in the total fleet. The 22 ft cut-aways are used in demand response (Dial-A-Ride). The 40 ft Heavy Duty transit buses are used in high demand local fixed route services. The 25' Cut-aways and the 32' Medium Duty transit buses are primarily used in the long distance intercity routes. All vehicles are wheelchair accessible in compliance with the Americans with Disabilities Act of 1990 as well as equipped with bike racks which hold two bikes each.

| Vehicle Type | Maximum Passenger Capacities | | | Maximum Load Factor |
|-------------------------------|------------------------------|----------|-------|---------------------|
| | Seated | Standing | Total | |
| 22' Cut-away | 9 | 0 | 9 | 1.0 |
| 25' Cut-away | 20 | 0 | 20 | 1.0 |
| 32' Transit Bus (Medium Duty) | 30 | 10 | 40 | 1.3 |
| 40' Transit Bus (Heavy Duty) | 38 | 10 | 48 | 1.3 |

Vehicle Headway Standards

Ukiah Valley Bus Service

Route 9 – Local, within Ukiah, approximately every 30 minutes between 6:30 am to 6:00 pm on weekdays, and every 45 minutes between 7:45 am to 5:00 pm on Saturdays

Route 9 – Local Evening Service is a flex route within Ukiah, approximately every hour between 6:00 pm to 11:00 pm weekdays. This route will deviate up to three-fourths of a mile to pick up or drop of passengers on request.

Route 7 – the Jitney, within Ukiah, is a direct route connecting North and South Ukiah, offers two trips a day on weekdays

Inland Bus Service

Route 20 – Inland, offers 12 trips per day between Willits and Ukiah, Monday through Friday which connects Willits and Mendocino Community College with timed transfers to Route 9 Ukiah Local from 7:00 am to 6:30 pm

Willits Local Service

Route 1 – Willits Local, runs approximately every hour between 7:00 am to 6:00 pm on weekdays. Note: Route 20 can also be used for local routes within Willits.

North Mendocino Bus Service

Route 5 – Bragg About, has hourly service within Fort Bragg on the weekdays from 8:00 am to 6:00 pm.

Route 60 – the Coaster, serves Fort Bragg south to Navarro River Junction, Monday through Friday. Within Fort Bragg, Route 60 operates on the same route as Route 5. At the Navarro River Junction, it connects with Route 75 for trips to the South Coast or Ukiah.

Route 65 – CC Rider, runs two round trips six (6) days per week from Mendocino/Fort Bragg to Willits, Ukiah and Santa Rosa, and one (1) round trip from Mendocino/Fort Bragg to Willits, Ukiah and Santa Rosa on Sundays.

South Mendocino Bus Service

Route 75 – Gualala/Ukiah, connects the South Coast with Ukiah, Monday through Saturday with one round trip each day. It serves the South Coast communities from Navarro River Junction to Gualala, and inland communities of Navarro, Philo, and Boonville. It connects with Route 60 at the Navarro River Junction Monday through Friday.

Route 95 – Point Arena/Santa Rosa, offers one round trip seven (7) days a week and connects the South Coast with Santa Rosa. It serves the coastal communities from Point Arena south to Bodega Bay.

Most inland riders are very transit dependent, in which nearly half of the riders are students. MTA does not have peak and off-peak hours.

On-Time Performance Standard:

On-time performance is manually tracked in the field by supervisors. Drivers are expected to call into dispatch when running late. On-time arrival for fixed route is defined by the bus arriving at the stop either on schedule or within 5 minutes after the schedule. Early bus arrivals typically approach the time point 1 to 2 minutes ahead, and are held at the bus stop until departure at the scheduled time, which are then counted as on-time.

MTA has seen an increase in wheelchair-bound passengers, which has made it challenging to maintain schedules. A consistent systemwide trend is the percentage of observed trips meeting schedule adherence at about 80 percent. The following table reflects data derived from FY09/10-FY11/12:

On-Time Performance

| | FY 2016/17 | FY 2018/19 | FY2019/20 | % Change FY15/16 |
|------------------|------------|------------|-----------|------------------|
| Total Checks | 542 | 422 | 362 | -33% |
| Over 10 min late | 11 | 7 | 19 | -27% |
| 5 to 9 min late | 52 | 66 | 72 | -31% |
| On time | 422 | 431 | 533 | +17% |
| Early | 3 | 5 | 3 | -88% |
| | | | | |
| On time | 82.7% | 81.9% | 79.4% | -2% |

Service Availability Standards:

It is Mendocino Transit Authority's goal to provide affordable, reliable, efficient and user-friendly transit service that effectively meets the local mobility needs of those residents, or visitors to, the MTA service area who have limited mobility options. Where practical, also serve the needs of those who choose mobility for some or all of their local travel needs for environmental or lifestyle reasons.

The local route system is designed such that 90 percent of the population cluster areas are within three-fourths (3/4) mile of a fixed route or within the service area of a deviated fixed route or general public Dial-A-Ride service.

Vehicle Assignment:

All vehicles within the Mendocino Transit Authority fleet are lift equipped, have bicycle racks and heat/air conditioning. Vehicles are assigned based on operating characteristics of the routes. High demand local routes typically operate 30-40 foot transit buses to accommodate the demand. Medium Duty and smaller more maneuverable cut-away type vehicles are used for intercity and long distance travel.

Transit Amenities:

Installation of transit amenities are based on passenger boarding's along the route. Our heaviest concentration of amenities is where the ridership is the greatest, which is primarily the local or inland routes. Shelters are installed where passenger boarding's are the heaviest, and regular or wing benches are installed at stops with fewer passenger boarding's. A recent bus stop review was performed for the South Coast Service where all recommendations for improvements were implemented.

ATTENTION:

Notifying the Public of Rights under the Title VI

Mendocino Transit Authority (MTA) operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act. Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Mendocino Transit Authority.

For more information on Mendocino Transit Authority's civil rights program, and the procedures to file a complaint:

Call: (707)462-5765

Website: www.mendocinotransit.org

or

Visit the Administrative Offices

at

241 Plant Road, Ukiah, CA 95482

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the:

Office of Civil Rights

Attention: Title VI Program Coordinator

East Building, 5th Floor-TCR, 1200 New Jersey Ave. SE

Washington DC 20590

ATENCIÓN:

Aviso al público de los derechos bajo el título VI

Mendocino Transit Authority (MTA) opera sus programas y servicios sin importar la raza, color u origen según el título VI de la ley de derechos civiles. Cualquier persona que crea que han sido ofendidos por cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja ante Mendocino Transit Authority.

Para más información sobre el programa derechos civiles de Mendocino Transit Authority y los procedimientos para presentar una queja:

Llame a: (707)462-5765

Sitio de internet: www.mendocinotransit.org

o

Vaya a la oficina ubicada en

241 Plant Road, Ukiah, CA 95482

Un demandante puede presentar una queja directamente con el Federal Transit Administration para poner una queja con la oficina de derechos civiles:

Office of Civil Rights

Attention: Title VI Program Coordinator

East Building, 5th Floor-TCR, 1200 New Jersey Ave. SE

Washington DC 20590