

# City of Manteca



## Manteca Transit Title VI Program

March 1, 2016

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# I. INTRODUCTION

## **Manteca Transit's Commitment to Civil Rights**

The City of Manteca is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services or programs on the basis of race, color or national origin, as afforded under Title VI of the Civil Rights Act of 1964.

### **Purpose**

The purpose of this policy is to establish guidelines to effectively monitor and ensure that the City of Manteca's transit services are in compliance with all Federal Transit Administration (FTA) Title VI requirements in order to carry out the provisions of the Department of Transportation (DOT) Title VI Regulations at 49 CFR Part 21. This policy follows the requirements detailed in FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," dated October 1, 2012.

### **Title VI Policy Statement**

As a Federal Transit Administration (FTA) fund recipient, the City of Manteca, operating Manteca Transit, will ensure that its programs, policies, and activities comply with the U.S. Department of Transportation (US DOT) Title VI Regulations of the Civil Rights Act of 1964 and its amendments. Title VI of the Civil Rights Act of 1964 requires that no person in the United States, on the grounds of race, color or national origin be excluded from, be denied the benefits of, or be subjected to discrimination, under any program or activity receiving federal financial assistance.

The City is committed to enforcing the provisions of Title VI and protecting the rights and opportunities of all persons associated with the City or affected by its programs. The City of Manteca's commitment includes vigorously enforcing all applicable laws and regulations that affect the City and those organizations, both public and private, which participate and benefit through our transit services and programs. The City will take positive and realistic affirmative steps to ensure that all persons and/or firms wishing to participate in its programs are given an equal and equitable chance to participate.

### **Environmental Justice/Limited English Proficiency Policy Statement**

The City of Manteca assures that every effort will be made to prevent the discrimination of low-income and minority populations as a result of any impact of its programs or activities in accordance with Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and in Low-Income Populations. In addition, the City also assures that every effort will be made to provide meaningful access to persons that have limited English proficiency, in accordance with Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency.

## II. GENERAL REQUIREMENTS

### Reporting Requirements

Contained within this section are the requirements that all FTA recipients must follow to ensure that their programs, policies and activities comply with the Title VI regulations. Because Manteca Transit is a small transit provider operating less than 50 vehicles in peak fixed route service, this document does not include the Title VI requirements required for urbanized areas over 200,000 in population.

### Notice to the Public

To make Manteca Transit's riders aware of its commitment to Title VI compliance, and of their right to file a civil rights complaint, the City of Manteca has posted a notice, in both English and Spanish, on its website at [www.ci.manteca.ca.us](http://www.ci.manteca.ca.us), on posters in information kiosks at the Manteca Transit Center, and on the buses. A copy of the Notice to the Public is attached as **Exhibit A**.

### Title VI Complaint Procedures

The City of Manteca has established a process for individuals to file a complaint under Title VI and for investigating all complaints. Full procedures for filing a complaint and the City's procedures for investigating complaints are detailed in the Civil Rights Complaint Procedure, attached as **Exhibit B**.

Both the City's Title VI Complaint Form and Procedures documents are available at the Manteca Transit Center, City Administrative offices and are also located on the City's website at [www.ci.manteca.ca.us](http://www.ci.manteca.ca.us). A copy of the Civil Rights Complaint Form is attached as **Exhibit C**.

### Record of Investigations, Lawsuits or Complaints

The City of Manteca is required to maintain a list of complaints, investigations or lawsuits that pertain to allegations of discrimination on the basis of race, color and/or national origin in transit-related activities and programs.

The City of Manteca's Transit Analyst maintains a list of Title VI investigations, complaints, and lawsuits and includes a summary and description of actions taken by the City, as required by the Title VI regulations. The list includes the date that the investigation, lawsuit, or complaint was filed; a summary of the allegations(s); the status of the investigation; lawsuit, or complaint; and actions taken in response, or final findings related to the investigation, lawsuit, or complaint. The list will be included in the City's Title VI submittal to the FTA every three years.

The City of Manteca has no transit-related Title VI complaints, investigations, or lawsuits filed against it. A copy of the Record of Investigations, Lawsuits or Complaints is attached as **Exhibit D**.

### III. PUBLIC PARTICIPATION PLAN

#### Key Purpose and Principles

Manteca's Public Participation Plan (PPP) has been prepared to ensure that no one is precluded from participating in Manteca Transit's service planning and development process. It ensures that:

- Potentially affected community members will have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health;
- The public's contribution can, and will, influence Manteca's decision making;
- The concerns of all participants involved will be considered in the decision-making process; and
- Manteca will seek out and facilitate the involvement of those potentially affected.

Through an open public process, Manteca has developed a public participation plan to encourage and guide public involvement efforts and enhance access to Manteca's transportation decision-making process by minority and Limited English Proficient (LEP) populations. The public participation plan describes the overall goals, guiding principles and outreach methods that the City of Manteca uses to reach its riders.

The steps outlined in the PPP offer early (in the planning process), continuous, and meaningful opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions at Manteca Transit. It is a guide for how the City engages its diverse community. The City may continue to improve its public participation methods over time based on feedback from riders and community members, including low-income, minority, and LEP populations, as well as customer and community-based organizations.

#### Objectives of the Public Participation Plan

The City of Manteca's Public Participation Plan is based on the following principles:

- **Flexibility** - The engagement process will accommodate participation in a variety of ways and be adjusted as needed.
- **Inclusiveness** – The City of Manteca will proactively reach out to and engage low income, minority and LEP populations from the Manteca service area.
- **Respect** - All feedback will be given careful and respectful consideration.
- **Proactive and Timeliness** - Participation methods will allow for early involvement and be ongoing.
- **Clear, Focused and Understandable** - Participation methods will have a clear purpose and use for the input, and will be described in language that is easy to understand.
- **Honest and Transparent** - Information provided will be accurate, trustworthy and complete.

- **Responsiveness** – The City of Manteca will respond and incorporate appropriate public comments into transportation decisions.
- **Accessibility** – Meetings will be held in locations which are fully accessible and welcoming to all area residents, including, but not limited to, low-income and minority members of the public and in locations relevant to the topics being presented and discussed.

The City of Manteca will use its public participation plan when considering fare changes, modifications to routes and schedules and other transit planning projects when:

- ✓ A fare increase or significant change in the method of fare payment is being considered;
- ✓ A new route is established;
- ✓ An existing route is proposed for elimination;
- ✓ Considering the total discontinuance of service on any line or group of lines on any given day when service is currently offered;
- ✓ Any system-wide change in service hours that exceeds (plus or minus) 10% of current total service hours;
- ✓ Routing on any given route that affects more than 25% of the riders using the affected route;
- ✓ Schedules are changed on any given route that reduce the total number of one-way bus trips by more than 25% of the current number of bus trips;
- ✓ For minor schedule and service changes, the City will post service change notices 30 days in advance on the City’s website, on buses, at bus stops and at the Manteca Transit Center.

### **Manteca’s Public Participation Process**

For any major service change or fare increase, the City of Manteca will schedule a public hearing to present the proposed change(s) and obtain public comment. In addition, the City will present the proposed changes and request comments at the Social Services Transportation Advisory Committee (SSTAC) public meeting, held at the offices of San Joaquin Council of Governments (SJCOG). The SSTAC is made up of members who represent a wide range of riders including minority, low income, senior, and disabled passengers, as well as transit agency representatives. These members share the information provided at the SSTAC meeting with their constituents throughout San Joaquin County.

The public hearing will be scheduled at a time and place accessible and convenient for the general public to attend. Legal notice of the public hearing will be published in a local newspaper of general circulation at least 30 calendar days prior to the public hearing. Additional notices will be placed on the City’s transit webpage, on rider alerts in transit vehicles, and on information kiosks at the Manteca Transit Center. Notices will be provided in both English and Spanish.

A staff person will record and prepare formal minutes of the public hearing. In addition, written or verbal comments will be accepted for at least one week following the public hearing.

Comments will be evaluated and incorporated into the recommendation and decision regarding the fare increase or service change.

Legal notices and press releases and/or advertising of the pending changes will be published in a local newspaper of general circulation at least 30 calendar days prior to implementation of the fare increase or service change.

### **Regional Partnership – Program of Projects**

The San Joaquin Council of Governments (SJCOG) is the Metropolitan Planning Organization for San Joaquin County. The City of Manteca relies on SJCOG’s public participation process to satisfy its public participation requirements for the FTA’s Program of Projects (POP) requirement. SJCOG has a Public Participation Plan that was adopted by the SJCOG Board on May 26, 2011.

SJCOG provides outreach to a number of minority and Limited English Proficient organizations, including, but not limited to, the following:

- African American Chamber of Commerce of San Joaquin County
- Asian Pacific Self-Development Residential Association
- California Miwok Tribe
- California Tribal Partnership
- Candelaria American Indian Council
- Central Valley Asia-American Chamber of Commerce
- El Concilio (Council for the Spanish-Speaking)
- Lao Family Community of Stockton, Inc.
- NAACP, Stockton Branch
- San Joaquin Hispanic Chamber of Commerce
- United Cambodian Families

The City of Manteca will work with the above organizations, as well, as part of its outreach.

### **Selection of Meeting Locations**

When determining locations and schedules for public meetings, the City of Manteca will:

- Schedule meetings at times and locations that are convenient and accessible for minority and LEP communities;
- Employ different meeting sizes and formats including town hall type meeting formats;
- Coordinate with community organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities;
- Provide opportunities for public participation through means other than written communication, such as one-on-one interviews or use of audio or video recording devices to capture oral comments.

## Summary of Public Participation Outreach Efforts

Over the last reporting period, Manteca Transit provided, and continues to provide, the following public outreach activities, services and programs:

- The Title VI Program, Complaint Procedure and Complaint Form are posted on the Manteca Transit page on the City’s website at [www.ci.manteca.ca.us](http://www.ci.manteca.ca.us) and at the administrative offices and the Transit Center.
- The City of Manteca provides a pay incentive for employees who are able to contribute to their duties with written and verbal bi-lingual fluency.
- Spanish speaking translators are available during normal business hours.
- Route and schedule information is printed in both English and Spanish and is available on the City’s website.
- Vehicle operators, dispatchers, and other front-line transit staff are surveyed on their experiences related to any contacts with LEP persons during the previous year.
- Unmet transit needs workshop notices are posted in both English and Spanish at the Transit Center, on buses and at information kiosks in the bus stops at the Transit Center.
- Legal and public notices are published in the County-wide newspaper, Latino Times.
- The transit information phone line at the Manteca Transit Center includes a Spanish language option to obtain transit information and to book rides for Dial-a-Ride service. After business hours, inquiries can be left on the bilingual voicemail and are responded to promptly the next business day.
- Key service advisories and notices are published in Spanish.
- As part of the 2014 Short Range Transit Plan, statistically valid telephone, personal, and mail-in polls were conducted in both English and Spanish.

## IV. LIMITED ENGLISH PROFICIENCY (LEP) PLAN

### Overview

Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). Individuals who have a limited ability to read, write, speak, or understand English are Limited English Proficient, or “LEP.”

The DOT LEP Guidance, as well as FTA Circular 4702.1A, states that certain FTA recipients or subrecipients, such as those serving very few LEP persons or those with very limited resources may choose not to develop a written LEP plan. However, the absence of a written LEP plan does not obviate the underlying obligation to ensure meaningful access by LEP persons to a recipient’s program or activities.

The City currently implements a number of measures to ensure that LEP clients and customers have meaningful access to the programs, services and activities of its transit program. Therefore, the City staff believes that it meets the standard for providing methods for meaningful input and access for limited-English speaking customers.

## Four Factor Analysis

In order to determine reasonable steps to ensure meaningful access to programs by LEP persons. There are four factors that agencies must consider when assessing language needs and determining what steps they should take to ensure reasonable access for LEP persons. A brief description of the self-assessment undertaken in each of the four areas is outlined below.

**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 Manteca Transit.***

According to the U.S. Census Bureau 2010-2014 American Community Survey for Manteca, the City's population age 5 years and over in 2014 was 64,824. 28.6% of that population estimate speaks a language other than English at home. The predominant language (other than English) is Spanish, with 20.7% of the population indicating Spanish is the primary language spoken in the home. The remaining 7.9% speak a variety of Indo-European, Asian and Pacific Islander and other (unidentified) languages at home.

Of the City's 20.7% Spanish speaking residents, 8% are identified as speaking English less than "very well", compared to 12.9% statewide in California.

To summarize using the percentages in "Languages Spoken At Home" from the 2010-2014 American Community Survey 5-Year Estimates, the City of Manteca has determined the following about the City's population over age 5 in the service area:

- 71.4% or 46,261 residents speak English only.
- Approximately 28.6% or 18,563 residents speak a language other than English at home. 11.4% or an estimated 7,420 people speak English less than "very well".
- The largest proportion of non-English speaking language groups is Spanish: 20.7% or an estimated 13,417 residents who speak Spanish at home. 8% or 5,178 of this language group speak English less than "very well".
- 7.9%, or an estimated 5,146 people speak Indo-European, Asian and Pacific Islander and "other" languages, and of these 3.4% or 2,242 people speak English less than "very well".

As part of the preparation of the City of Manteca's 2014 Short Range Transit Plan, a community outreach effort was conducted over various time periods which included onboard rider surveys, community surveys, stakeholder surveys and community workshops. The goal of the surveys was to collect market research data at the rider level about trip purpose, frequency of use, satisfaction with service, and rider demographics.

While all surveys were prepared in a bilingual format with English on one side and Spanish on the other, 97% were completed in English. In addition, key findings from the community survey sent to 1,600 households, cited English as the language spoken in the homes of nearly 94% of respondents. Approximately 20% speak Spanish, which suggested there are a number of

households where both languages are spoken. In addition, nearly 16% of respondents indicated having a family member who does not speak English very well.

Based on the above data and findings, as well as the City's experience, Spanish is the primary non-English language that the City of Manteca is most likely to encounter in its activities and programs associated with Manteca Transit.

**Factor 2: *The frequency with which LEP individuals come in contact with the program.***

The City of Manteca has assessed the frequency with which staff has, or could possibly have, contact with LEP individuals. This assessment included examining census data, phone inquiries, requests for translated documents, and staff feedback. As discussed in Factor 1 above, census data indicate that there are a small percentage of Spanish-speaking residents (over ages 5) who speak English less than very well. As a transportation provider, it is necessary to acknowledge this segment of the general population.

Phone inquiries and staff feedback indicate that the City's transit dispatchers and drivers interact relatively little with people with limited English proficiency. Both transit dispatchers speak Spanish and translate in person or over the phone approximately two times per month. Calls rarely come in requesting translation when Spanish speaking employees are unavailable and there have been no calls for other language translation services. Four of the ten transit drivers speak Spanish, and only one has ever been asked to communicate with a passenger in Spanish.

Voicemail, with a Spanish language option, is available at the transit dispatch office and staff responds the next business day to all messages. Dispatch staff indicates only receiving 2-3 calls per month for the Dial-a Ride reservation based demand response service. Based on this information, Manteca 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 on the buses, the City's website and at the Manteca Transit Center.

**Factor 3: *The nature and importance of the program, activity or service provided by Manteca Transit to people's lives.***

Access to the services provided by Manteca Transit, both fixed route and demand response are critical to the lives of many in our community. Many depend on Manteca Transit's fixed route services for access to jobs, schools, shopping and medical appointments. Riders eligible for service under the American's with Disabilities Act (ADA) require service for the same reasons. Because of the essential nature of the services and the importance of these programs in the lives of our residents, there is a need to ensure that language is not a barrier to access.

As indicated in Factor 1, a public outreach effort was conducted as part of the City's 2014 Short Range Transit Plan. A variety of surveys were conducted to analyze usage of and access to Manteca Transit services. Results of the survey concluded that nearly 95 percent of Manteca residents believe public transit is important to their community's quality of life.

To further assess personal mobility options, respondents were asked how he or she would have made the surveyed trip had Manteca Transit not been available. Nearly 35 percent indicated they would “walk” to make the surveyed trip if the City’s transit service had not been available. Another nearly 25 percent would ride with a friend or family member, while 20 percent said that they would not have made the surveyed trip. Taken collectively (80 percent), this data suggests that Manteca Transit services are very important as a primary means of transportation for its customers. While all the surveys were conducted with bi-lingual options, a full 97 percent were completed in English.

**Factor 4: *The resources available to the recipient and costs.***

The City of Manteca has assessed its current available resources that are used for providing LEP assistance. Vehicle operators, who are the most direct point of contact for LEP persons, have several methods to respond to an LEP individual. In many instances, LEP individuals are accompanied by a companion who speaks English and can translate for the individual. In addition, 4 of the 10 vehicle operators speak Spanish. For those vehicle operators not able to provide translation services, they are instructed to call in to the dispatcher on duty.

A variety of information is distributed in both English and Spanish including bus schedules, brochures, posted flyers, policies, and phone call system recordings, among other necessary materials. In addition, the dispatchers at Manteca Transit Center who handle reservations and assist customers at the customer service window speak fluent Spanish.

Given the relatively small amount of LEP persons encountered in day to day service, it was determined that the City of Manteca provides a reasonable level of information and resources for LEP persons based on demand and always upon request.

**Conclusion of Four Factor Analysis**

Given the relatively modest size of the City’s transit services and the small number of LEP persons encountered on a daily basis, the City has determined that it is not necessary to develop a formal LEP plan. This is done with the full understanding that the absence of a written LEP plan does not obviate the underlying obligation to ensure meaningful access by LEP persons to the City’s transit program.

**Monitoring Plan**

The City of Manteca is committed to improving access to its transit services and programs for LEP persons and will continue to develop materials to provide meaningful access to Spanish speaking persons. Every three years the City will review and analyze the need for a formal LEP plan as required by the FTA.

At a minimum, the plan will be reviewed and updated when more data from the 2010 U.S. Census becomes available, when a new census occurs or when it is clear that higher concentrations of LEP individuals are present in the City’s transit service area. Updates will include the following as defined below:

- Documentation of LEP Personal Contacts.
- 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 the City’s financial resources are sufficient to fund language assistance resources needed.
- Determine whether complaints have been received concerning the City’s failure to meet the transit needs of LEP individuals.

### **Safe Harbor Stipulation**

Federal law provides a “Safe Harbor” stipulation so that recipients can ensure, with greater certainty that they comply with their obligation to provide written translations in languages other than English. A “safe harbor” means that if a recipient provides written translation in certain circumstances, such action will be considered strong evidence of compliance with the recipient's written-translation obligations under Title VI.

The City of Manteca complies with the Safe Harbor provisions when additional information is requested to be translated in languages other than English.

### **Staff Training**

The following training will be provided to Manteca Transit staff:

- Information on Manteca Transit’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)
- How to document language assistance requests.
- The procedure on handling a potential Title VI complaint.

### **Future Outreach Efforts**

While the City of Manteca has determined that it is not necessary to prepare a formal LEP Plan, it will provide continual monitoring of its programs and assess the need for additional services for LEP residents. When it becomes apparent that higher concentrations of LEP individuals are present in Manteca Transit’s service area, additional analysis will be conducted to gauge the need for additional programs.

Notwithstanding the above, the City of Manteca is committed to continuing its efforts to ensure LEP individuals have access to all programs, activities and information by conducting the following efforts in the future:

- Implement Google Transit on the City’s transit webpage to allow riders to plan their trips on the fixed route system.

- Add Google Translate services to the transit webpage.
- In coordination with future route changes, the Manteca Transit schedule and service guide will be redesigned. This will be produced in Spanish as well as English.
- Implementation of Spanish language PSA's in bus shelters.
- Key information on the City's web site will continue to be translated and published in Spanish.
- Include information on meeting notices on how to request translation services.
- Use of the Census Bureau's Language Identification Flashcards at transit-related meetings to assist in identifying language assistance needs for future meetings.
- Place 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 try to obtain contact information to allow staff to follow-up.
- When an interpreter is needed for a language that the City is unable to provide an interpreter for, staff will utilize a professional interpreter service.
- Documentation of language assistance requests.

## V. OTHER REQUIREMENTS

### Minority Representation on Planning and Advisory Bodies

The City of Manteca does not have a non-elected transit board or advisory council. In the event that such a board was established, the City would ensure that effective efforts were made to encourage minority participation on such committees.

### Equity Analysis for Site Determination for Location of Facilities

The City of Manteca will ensure that both environmental analysis and Title VI environmental justice requirements are incorporated into the scope of work for all facilities projects it may undertake in the future.

### Requirement to Provide Additional Information on Request

The City of Manteca will provide additional information, if at the discretion of FTA, more information is necessary in order to investigate a complaint of discrimination. The City of Manteca will submit an updated Title VI program every three years to the FTA regional Civil Rights officer. The submittal of the Title VI program is conducted through FTA's TrAMS (Transit Award Management System).

### Providing Assistance to Subrecipients

Title 49 CFR Section 21.9(b) states that if *“a primary recipient extends Federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligations under this part. Primary recipients should assist their subrecipients in complying with DOT's Title VI regulations, including the general reporting requirements. Assistance shall be provided to the subrecipient as necessary and appropriate by the primary recipient.”*

After the 2010 Census, redistricting created new urbanized area (UZA) boundaries and the City of Ripon was moved from Modesto's UZA to Manteca's. Ripon is now a subrecipient to Manteca. Accordingly, we recognize our obligation to comply with Title 49 CFR Section 21.9(b) above, to ensure that Ripon is compliant with its Title VI obligations.

Ripon is a relatively small community of less than 6 square miles with a population of approximately 15,000. Ripon currently operates "The Blossom Express," a deviated fixed route service that provides four, one-hour round trips into Modesto every Tuesday and Thursday. The City of Modesto continues to provide federal funding to assist Ripon in its small transit operation. Manteca currently does not provide Federal financial assistance to Ripon. Therefore, Manteca's obligation to provide Ripon with Title VI assistance is not required at this time.

However, the San Joaquin Council of Governments (SJCOG) is currently working with Ripon to prepare their Short Range Transit Plan (SRTP). Upon implementation of their SRTP and Ripon identifies a need for federal financial assistance from the Manteca UZA and an amount is agreed upon, the City of Manteca will provide the following assistance to Ripon in the furtherance of their Title VI program, as necessary:

- a. Sample Notices to the public informing them of their rights under Title VI regulations, procedures on how to file a Title VI complaint, and the City of Manteca's Title VI Complaint Form.
- b. Sample procedures for tracking and investigating Title VI complaints filed with Ripon, and the timeline/schedule they must adhere to in notifying the City of Manteca of any complaints received.
- c. Demographic information on the race and English proficiency of residents served by the City of Ripon. This information will assist Ripon in assessing the level and quality of service it provides to residents within its service area and in assessing the need for language assistance.
- d. Other data such as travel patterns and surveys obtained by the City of Manteca that will assist Ripon in complying with Title VI.

## **VI. SERVICE STANDARDS FOR FIXED ROUTE SYSTEM**

### **System-Wide Service Standards**

Chapter IV of FTA Circular 4702.1B discusses the additional reporting requirements for recipients of FTA funding that operate fixed route transit service, in order to ensure that the agency complies with DOT Title VI regulations. The requirements only apply to fixed route service, not demand response service. Per Circular 4702.1B definitions, "Fixed route refers to public transportation service provided in vehicles operated along pre-determined routes according to a fixed schedule."

Manteca Transit qualifies for a reduced level of Chapter IV reporting. If a fixed route transit provider does not operate 50 or more fixed route vehicles in peak service, the transit provider is only required to set system-wide standards and policies.

Outlined below are the system-wide service standards for Manteca Transit:

**1. Vehicle Load for Fixed Route Service**

*Vehicle Load is expressed as the ratio of passengers to the number of seats on a vehicle, relative to the vehicle’s maximum load point.*

The City’s transit fleet consists of seven (7) cut-away vehicles. All are wheelchair accessible in compliance with the Americans with Disabilities Act (ADA) and all are equipped with bike racks. Manteca Transit rarely turns passengers away due to overcapacity.

The City system-wide goal is to have an average maximum load factor for fixed route service not to exceed 1.0, (i.e. 20 passengers for 20 seats and no standees). The chart below identifies the make and model of the vehicles used to provide fixed route service and their maximum load factor:

Vehicle Type	Average Passenger Capacities				
	Vehicle Length	Seating Capacity	Standing Capacity*	Total	Maximum Load Factor
GMC 3500 - ARBOC	26 ft.	21	0	21	1.0
Ford El Dorado	24 ft.	20	0	20	1.0

\* For safety reasons, Manteca Transit does not allow standees on any of its vehicles.

**2. Vehicle Headways for Fixed Route Service**

*Vehicle Headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. Vehicle headways are measured in minutes; service frequency is measured in vehicles per hour. Headways and frequency of service are general indications of service provided along a route.*

Manteca Transit operates three fixed routes, Monday through Friday from 6:00 am – 7:00 pm. Each route consists of a one-way loop of approximately 13 miles and 25 stops. Saturday service consists of general public access to the reservation-based Dial-a-Ride system, which operates on an as-needed basis between 9:00 am and 4:00 pm.

Manteca Transit’s vehicle headway is 60 minutes on all fixed routes and does not have peak and off-peak hours. Therefore, vehicle frequency per route during weekdays is one (1) vehicle per hour.

**3. On-Time Performance for Fixed Route Service**

*On-time performance is a measure of runs completed as scheduled.*

On-time performance is tracked manually in a daily log by the drivers while on route. In addition, drivers are required to call in to dispatch when running late. Below are the City of Manteca’s on-time performance standards for fixed route service:

*On-Time Departures:*

It is the goal of the City that fixed route buses shall depart no more than 5 minutes late from any scheduled time point. In addition, Manteca Transit strives to ensure a minimum of 95% of all departures meet this criterion.

*Operating Ahead of Schedule (HOT):*

No bus shall depart a designated time point prior to its scheduled departure time.

*Missed Trips:*

Manteca Transit shall, at a minimum, complete 100% of all scheduled trips. Any fixed route trip operating 20 minutes or more behind the scheduled time shall be considered a “missed trip”.

**4. Service Availability for Each Mode**

*Service availability is a general measure of the distribution of routes within a transit provider’s service area.*

It is Manteca Transit’s goal is to provide affordable, reliable, efficient and user-friendly transit service that effectively meets the local mobility needs of those who have limited mobility options and those who choose Manteca Transit for environmental or lifestyle reasons.

Transit service is provided to major destinations and activity centers within Manteca. This goal includes major employers, shopping centers, healthcare and educational facilities, and other large trip generators. The availability of routes is based on the ridership demand balanced with available resources.

## **VII. SYSTEM-WIDE SERVICE POLICIES**

FTA requires that all providers of fixed route public transportation develop qualitative policies for the categories listed below. These policies are to be set by individual transit providers. Therefore, these policies will apply to individual agencies rather than across the entire transit industry.

### **Transit Amenities**

Transit amenities refer to items of comfort, convenience and safety that are available to the general riding public. Fixed route transit providers must set a policy to ensure equitable distribution of transit amenities across the system. This requirement applies after a transit provider has decided to fund an amenity. Transit amenities may include: seating (benches, seats at stops/stations); bus shelters; printed information (signs, system maps, schedules); and waste receptacles.

The City of Manteca determines equitable locations of all transit amenities placed throughout the City to serve the fixed route system. There are currently 75 bus stop locations in the fixed route system. Bus stop improvements will be given priority at locations that receive higher numbers of boardings and alightings and will be made throughout the City during implementation of each improvement cycle.

### **Vehicle Assignment**

Vehicle assignment refers to the process by which transit vehicles are placed into service on routes throughout the transit provider’s system. The seven (7) cutaway vehicles within the Manteca Transit fleet are lift or ramp equipped, have bicycle racks and heat/air conditioning. There is very little difference within the fleet in regard to passenger amenities or capacity. While the vehicles are sometimes shared between modes, four are dedicated for fixed route use. Distribution of vehicles throughout the fixed route system will not be based on age or condition of vehicles, but rather the needs for that particular route.

### **Contact Information**

The City of Manteca believes firmly in the essential role of the public in the transportation planning process, welcoming any and all comments from citizens or groups concerning transportation issues at any time throughout the year.

The City may be contacted at the following:

City of Manteca – Finance Department  
Transit Project Analyst  
1001 W. Center Street  
Manteca, CA 95337  
Phone: (209) 456-8775  
Fax: (209) 691-7439  
Website: [www.ci.Manteca.ca.us](http://www.ci.Manteca.ca.us)

Exhibit A



City of Manteca  
Finance Department  
1001 W. Center Street  
Manteca, CA 95336  
(209) 456-8775

**Notice to the Public  
Your Rights Under Title VI**

Manteca Transit operates its programs and services without regard to race, color and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Manteca.

For more information on the City of Manteca's Civil Rights program and the procedures to file a complaint, please contact us at:

Phone: (209) 456-8775  
E-Mail: [glantsberger@ci.manteca.ca.us](mailto:glantsberger@ci.manteca.ca.us)  
Website: [www.ci.manteca.ca.us](http://www.ci.manteca.ca.us)  
Office: City of Manteca Finance Department  
Transit Project Analyst  
1001 W. Center Street  
Manteca, CA 95337

A complaint may be filed directly with the Federal Transit Administration by contacting:

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

If information is needed in another language, please contact (209) 456-8775.

Para informacion en Español por favor llame al (209) 456-8775.



## Exhibit B

City of Manteca  
Finance Department  
1001 W. Center Street  
Manteca, CA 95336  
(209) 456-8775

# **manteca** *transit*

## **Title VI Complaint Procedures**

1. Any person who believes he or she has been discriminated against on the basis of race, color, or national origin by the City of Manteca in its operation of Manteca Transit (hereinafter referred to as “City”) may file a Title VI complaint by completing and submitting the agency’s Title VI Civil Right Complaint Form.
2. A complaint may also be filed by a representative on behalf of a person. Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative.
3. 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 the City of Manteca or its transit contractor, the person shall be asked to complete the City’s Complaint Form.
4. The Complaint Form is located on the Manteca Transit page of the City’s website at [www.ci.manteca.ca.us](http://www.ci.manteca.ca.us) or can be obtained by contacting the City of Manteca Finance Department at (209) 456-8775 or via e-mail at [gplantsberger@ci.manteca.ca.us](mailto:gplantsberger@ci.manteca.ca.us) . Instructions for submitting the completed complaint are included on the Complaint Form.
5. A person may also file a complaint directly with the Federal Transit Administration or with the California Department of Transportation at the following addresses:

Federal Transit Administration  
Office of Civil Rights  
1200 New Jersey Avenue SE  
Washington, DC 20590

California Department of Transportation  
Division of Rail and Mass Transit  
PO Box 942874, MS #39  
Sacramento, CA 94274-0001

6. If a Title VI complaint is filed simultaneously with an external entity such as one of the agencies above or any other Federal or State agencies or courts, the external complaint will supersede the City’s complaint and the City’s complaint procedures will be suspended pending the external entity’s findings.
7. Civil rights complaints should be filed as soon as possible, but no more than 180 days after the alleged incident. The City will process complaints that are complete. In instances where additional information is needed for assessment or investigation of the complaint, the City will contact the complainant in writing within fifteen (15) working days. Failure of the complainant to provide the requested information within thirty (30)

business days may result in the administrative closure of the complaint. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

8. Once the complaint is received, it will be referred to the City of Manteca Human Resources Director for review to determine if it has jurisdiction.
9. The City will respond within ten (10) working days with an acknowledgement letter informing the complainant whether their complaint will be investigated by the City's Human Resources Director.
10. If the complaint will be investigated by the City's Human Resource Director, it must be completed within ninety (90) calendar days of receipt of the complaint. The Human Resources Director will notify the complainant in writing of the final decision reached, including the disposition of the matter. One of two letters will be issued to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was 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 person or other action will occur.
11. The complainant will also be advised of their right to appeal the decision to federal and state authorities as appropriate. If the complainant wishes to appeal the City's decision, they have ten (10) days after the date of the letter or the LOF to do so. The City's Finance Director will also provide a copy of the City's decision and summary of findings to the California Department of Transportation and the Federal Transit Administration upon completion of the investigation.



# **manteca**transit

## **Civil Rights Complaint Form**

Title VI of the 1964 Civil Rights Act requires that “No person in the United States 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 receiving federal financial assistance.”

If you believe you have received discriminatory treatment by Manteca Transit on the basis of your race, color, or national origin, you have the right to file a complaint with the City of Manteca. The complaint must be filed within 180 calendar days of the alleged discriminatory incident.

The information requested below is necessary to assist us in processing your complaint. Should you require any assistance in completing this form, please contact the City of Manteca.

### **Section I.**

---

1. Name: \_\_\_\_\_
2. Full Address: \_\_\_\_\_
3. Telephone: \_\_\_\_\_ Cell  Home  Work
4. Email Address: \_\_\_\_\_
5. Accessible Format Requirements? Large Print  Audio Tape  TDD  Other \_\_\_\_\_

### **Section II.**

---

6. Are you filing this complaint on your own behalf? Yes  No  If Yes, go to **Section III**
7. If no, please provide the following information on the person for whom you are filing this complaint:
8. Name: \_\_\_\_\_ Relationship: \_\_\_\_\_
9. Full Address: \_\_\_\_\_
10. Please explain why you have filed for a third party: \_\_\_\_\_
11. Do you have permission of the third party to file on their behalf? Yes  No

### **Section III.**

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12. Which of the following best describes the reason you believe the discrimination took place? (Check all that apply): Race  Color  National Origin
13. Date of alleged discrimination (Month, Day, Year) \_\_\_\_\_

14. Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who alleged discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, attach an additional sheet to this form. \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Section IV.**

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15. Have you ever filed a Civil Rights complaint with the City of Manteca in the past? Yes  No

**Section V.**

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16. Have you filed this complaint with any other Federal, State, or local agency? Yes  No   
 If Yes, check all that apply and provide name of agency:

- |                                               |                                              |
|-----------------------------------------------|----------------------------------------------|
| <input type="checkbox"/> Federal Agency _____ | <input type="checkbox"/> Federal Court _____ |
| <input type="checkbox"/> Local Agency _____   | <input type="checkbox"/> State Court _____   |
| <input type="checkbox"/> State Agency _____   |                                              |

17. Please provide information about a contact person at the agency/court where the complaint was filed:  
 18. Contact Name: \_\_\_\_\_ Title: \_\_\_\_\_  
 19. Full Address: \_\_\_\_\_ Telephone: \_\_\_\_\_

**Section VI.**

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20. Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

\_\_\_\_\_ Signature

\_\_\_\_\_ Date

Please submit this form in person or by mail to the address below:

City of Manteca Finance Department  
 Attn: Civil Rights Complaint – Transit Division  
 1001 W. Center Street, Suite D  
 Manteca, CA 95337

If you have any questions or need assistance filling out this form, please contact the City of Manteca at (209) 456-8775 or [glantsberger@ci.manteca.ca.us](mailto:glantsberger@ci.manteca.ca.us).  
 The City will respond within 10 days of the alleged discrimination once the City receives this form.



Exhibit D

City of Manteca  
 Finance Department  
 1001 W. Center Street  
 Manteca, CA 95336  
 (209) 456-8775



## Record of Transit-Related Title VI Complaints, Investigations and Lawsuits

In accordance with FTA Title VI Regulations, all recipients of Federal funds are required to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the City of Manteca.

Below is the list that is maintained in the City of Manteca Finance Department and is included in the Title VI Program submitted to FTA every three years:

Record of Title VI Complaints, Investigations and Lawsuits				
	Date	Summary	Status	Actions Taken
<b>Investigations</b>				
1.				
2.				
3.				
<b>Lawsuits</b>				
1.				
2.				
3.				
<b>Complaints</b>				
1.				
2.				
3.				