

**San Benito County Local Transportation
Authority's
Title VI Program**

Approved and Adopted by Board of Directors September 17, 2020

Contents

Policy.....	3
Location of Title VI Notice Posting.....	3
English Notice to Public	3
Spanish Notice to Public.....	4
Title VI Complaints and Procedures	4
List of Transit-Related Title VI Investigations, Complaints, and Lawsuits	4
Complaint Procedures in English.....	4
Complaint Procedures in Spanish.....	5
English Title VI Complaint Form	7
Spanish Title VI Complaint Form.....	9
Public Participation Plan.....	11
Purpose	11
Population of San Benito County.....	11
Demographic	11
County Express Service Area	11
Specialized Transportation Service Area	12
Data Deficiency	12
Public Participation Process.....	12
Approach to Public Participation.....	12
Outreach Requirements and Activities.....	12
Summary of Outreach Efforts Made Since Last Title VI Submission.....	13
Outreach Methods to Engage Minority and Limited English Proficient Populations.....	13
Non-Elected Committees and Councils.....	13
Language Assistance Plan (LAP)	15
Plan Summary	15
Four – Factor Analysis.....	16
1. Potential Number of LEP Persons Served	16
2. Service Contact Frequency of LEP Persons.....	17
3. Significance of Programs to LEP Persons.....	17
4. Available Resources for LEP Assistance	17

Implementation	18
Identifying LEP Individuals Who Need Language Assistance	18
Language Assistance Measures	18
Translation of Vital Documents and Safe Harbor Provision	19
Staff Training	19
Public Involvement	20
Monitoring and Updating the LAP Plan.....	20
Notice to LEP Persons.....	20
Title VI Facilities Equity Analysis	21
System-Wide Standards and Policies	22
Vehicle Load Standards.....	22
Vehicle Headway Standards.....	22
On-Time Performance Standards	22
Service Availability Standards.....	23
Vehicle Assignment Policy.....	23
Transit Amenities Policy.....	23
Board of Directors Approval of San Benito County Local Transportation Authority's Title VI Program.....	24

This document was prepared by Local Transportation Authority and approved by its Board of Directors to comply with Title VI of the Civil Rights Act of 1964, including provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients."

Policy

The San Benito County Local Transportation Authority operates its programs and services ensuring that no person shall be excluded from the equal distribution of its services and amenities based on their race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminator practice under Title VI may file a complaint with the San Benito County Local Transportation Authority.

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. Presidential Executive Order 12898 addresses environmental justice in minority and low-income populations. Presidential Executive Order 13166 addresses services to those individuals with limited English proficiency.

Location of Title VI Notice Posting

The San Benito County Local Transportation Authority's Title VI Notice to the Public is at the following locations:

Location Name	Address	City
Administration Office	330 Tres Pinos Road, Suite C7	Hollister
Operations Facility	3240 Southside Road	Hollister
Jovenes de Antaño Office	300 West Street	Hollister

The Title VI notice and program information is also provided on San Benito County Local Transportation Authority's website at: www.SanBenitoCountyExpress.org/TitleVI.html

English Notice to Public

Notifying the Public of Rights Under Title VI

San Benito County Local Transportation Authority

The San Benito County Local Transportation Authority (LTA) 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 she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the LTA.

For more information on the LTA's civil rights program, and the procedures to file a complaint, call 831.637.7665, visit our administrative office at 330 Tres Pinos Road, Suite C7 in Hollister, CA, or visit www.SanBenitoCountyExpress.org/TitleVI.html.

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 Avenue, SE, Washington DC 20590.

If information is needed in another language, call 831.637.7665.

Spanish Notice to Public

Notificar al público de los derechos bajo el título VI

La Autoridad Local de Transporte del Condado de San Benito

La Autoridad Local de Transporte del Condado de San Benito (LTA) opera sus programas y servicios sin respecto a raza, color y origen nacional con arreglo al título VI de la Civil Ley de derechos. Cualquier persona que cree que él o ella ha sido agraviado por cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja con la LTA

Para obtener más información sobre el programa derechos civiles capaz de industrias y el procedimientos para presentar una queja, llame al 831.637.7665 o visite nuestra oficina administrativa en 330 Tres Pinos Road, Suite C7 en Hollister, CA o visite www.SanBenitoCountyExpress.org/TitleVI_es.html.

Un demandante puede presentar una queja directamente con el Federal Transit Administration por archivar una queja con la Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

Si se necesita información en otro idioma, contacte al 831.637.7665

Title VI Complaints and Procedures

List of Transit-Related Title VI Investigations, Complaints, and Lawsuits

The San Benito County Local Transportation Authority has not been involved in any transit-related Title VI investigations, complaints, or lawsuits.

Complaint Procedures in English

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. Presidential Executive Order 12898 addresses environmental justice in minority and low-income populations. Presidential Executive Order 13166 addresses services to those individuals with limited English proficiency.

Any person who believes that they have been excluded from, denied the benefits of, or been subjected to discrimination may file a written complaint with the San Benito County Local Transportation Authority (LTA). Federal and State law requires complaints be filed within one-hundred eighty (180) calendar days of the last alleged incident.

To request additional information on LTA's nondiscrimination obligations or to file a Title VI Complaint, please submit your request to:

San Benito County Local Transportation Authority
Attn: Title VI Complaint
330 Tres Pinos Road, Suite C7
Hollister, CA 95023
Tel: 831.637.7665 Fax: 831.636.4160

Complaint Forms can also be obtained at the LTA Office at 330 Tres Pinos Road, Suite C7 in Hollister, CA or online at www.SanBenitoCountyExpress.org/TitleVI.

Complaint Process

The LTA will begin an investigation within fifteen (15) working days of receipt of a complaint and will contact the complainant in writing no later than thirty (30) working days after receipt of complaint for additional information, if needed. If the complainant fails to provide the requested information in a timely basis, the LTA may administratively close the complaint.

LTA will complete the investigation within ninety (90) days of receipt of the complaint. If additional time is needed for investigation, complainant will be contacted. A written investigation report will be prepared by the investigator. This report shall include a summary description of the incident, findings and recommended corrective action.

A closing letter will be provided to the complainant and the respondent or respondent department. Parties will have five (5) working days from receipt of the closing letter to appeal. If neither party appeals, the complaint will be closed. If required, the investigation report will be forwarded to the appropriate federal agency.

Complaint Procedures in Spanish

El Título VI de la Ley de Derechos Civiles de 1964 establece que ninguna persona de los Estados Unidos será excluida de participar en cualquier programa o actividad que reciba asistencia financiera federal, ni se le negará los beneficios de dichos programas o actividades, ni será discriminado en ellos, por causa de su raza, color o nacionalidad. El decreto presidencial 12898 aborda la justicia del medio ambiente en las poblaciones de minorías y de bajos ingresos. El decreto presidencial 13166 aborda el tema de los servicios para aquellas personas que tienen conocimientos limitados del idioma inglés.

Toda persona que crea haber sido excluida, que se le negaron los beneficios, o que fue discriminada puede presentar una queja por escrito a la Autoridad Local de Transporte del Condado de San Benito (LTA). La legislación federal y estatal exige que las quejas sean presentadas dentro de los ciento ochenta (180) días calendario del último supuesto incidente.

Para obtener información adicional sobre las obligaciones de no discriminación de LTA o para presentar una queja de Título IV, por favor comuníquese con

San Benito County Local Transportation Authority
Attn: Title VI Complaint
330 Tres Pinos Road, Suite C7
Hollister, CA 95023
Tel: 831.637.7665 Fax: 831.636.4160

Los formularios de queja también están disponibles en la oficina de LTA en 330 Tres Pinos Road, Suite C7 en Hollister, CA o página web de County Express:
www.SanBenitoCountyExpress.org/TitleVI.

Procedimiento para quejas del Título VI

La LTA comenzará una investigación dentro de los quince (15) días hábiles a partir de la recepción de la queja. En caso de que sea necesario solicitar información adicional, la LTA se comunicará con el demandante por escrito en un plazo de no más de treinta (30) días hábiles luego de recibir la queja. Si el demandante no proporcionara la información solicitada de forma oportuna, la LTA podrá cerrar el caso de forma administrativa.

La LTA completará la investigación dentro de los noventa (90) días a partir de la recepción de la queja. En caso de necesitar más tiempo para la investigación, se contactará al demandante. El investigador preparará un informe escrito de la investigación. Este informe deberá incluir un resumen de la descripción del incidente, las conclusiones y las medidas correctivas recomendadas.

Se le enviará una carta que informe que el caso se ha cerrado al demandante y al demandado o departamento demandado. Las partes tendrán cinco (5) días hábiles desde la recepción de la carta de cierre del caso para apelar. En caso de que ninguna de las partes apele, se cerrará el caso. De ser necesario, se enviará el informe de investigación a la agencia federal correspondiente.

English Title VI Complaint Form

Section I:		
1. Name:		
2. Address:		
3. Telephone:		3.a. Secondary Phone:
4. Email Address:		
5. Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
Section II:		
6. Are you filing this complaint on your own behalf?		YES* NO
*If you answered "yes" to #6, go to Section III. If you answered "no" to #6, go to #7.		
7. What is the name of the person for whom you are filing this complaint? Name		
8. What is your relationship with this individual:		
9. Please explain why you have filed for a third party:		
10. Please confirm that you have obtained permission of the aggrieved party to file on their behalf.		YES NO
Section III:		
11. I believe the discrimination I experienced was based on (check all that apply): <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin		
12. Date of alleged discrimination: (mm/dd/yyyy)		
13. 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 discriminated against you (if known), as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.		

Section IV:		
14. Have you previously filed a Title VI complaint with the San Benito County Local Transportation Authority?	YES	NO
Section V:		
15. Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?		
[] YES* [] NO		
If yes, check all that apply:		
[] Federal Agency _____	[] State Agency _____	
[] Federal Court _____	[] Local Agency _____	
[] State Court _____		
16. If you answered "yes" to #15, provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
Title:		
Agency:		
Address:		
Telephone:		Email:
Section VI:		
Name of Transit Agency complaint is against:		
Contact Person:		
Telephone:		

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

Signature and date are required below to complete form:

Signature _____ Date _____

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

San Benito County Local Transportation Authority
 Attn: Title VI Complaint
 330 Tres Pinos Road, Suite C7
 Hollister, CA 95023

Spanish Title VI Complaint Form

Parte I:		
1. Nombre:		
2. Dirección Residencial:		
3. Teléfono:		3.a. Otro teléfono:
4. Dirección de correo electrónico:		
5. ¿Requisitos de formato accesible?	<input type="checkbox"/> Letra Grande	<input type="checkbox"/> Cinta de audio
	<input type="checkbox"/> Dispositivos electrónicos para sordos (TDD)	<input type="checkbox"/> Otro
Parte II:		
6. ¿Está presentando esta queja en su propio nombre?		Sí* No
*Si usted contesto "sí" a #6, vaya a la Sección III. Si su respuesta es "no" a #6, vaya a #7.		
7. ¿Cuál es el nombre de la persona para la cual usted está presentando esta queja? Nombre:		
8. ¿Cuál es su relación con esta persona?:		
9. Por favor explique por qué ha presentado por un tercero :		
10. Por favor confirme que ha obtenido permiso de la parte agraviada para presentar en su nombre.		Sí No
Parte III:		
11. Creo que la discriminación que viví fue basada en (<i>marque todas las que apliquen</i>): <input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Nacionalidad		
12. Fecha del presunto acto de discriminación: (<i>mm/dd/yyyy</i>)		
13. Explique lo más claramente posible lo que pasó y por qué cree que fue discriminado. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona (s) que lo discriminó (si se conoce), así como los nombres y datos de contacto de testigos. Si se necesita más espacio, por favor utilice el reverso de este formulario.		

Parte IV:		
14. ¿Ha presentado anteriormente una queja del Título VI con la Autoridad Local de Transporte del Condado de San Benito?	Sí	No
Parte V:		
15. ¿Presentó esta demanda ante otra agencia federal, estatal, local o ante un tribunal estatal o federal?		
[] Si* [] No		
Si la respuesta es sí, marque todas las que apliquen:		
[] Agencia Federal _____	[] Agencia Estatal _____	
[] Tribunal Federal _____	[] Agencia Local _____	
[] Tribunal Estatal _____		
16. Si usted contestó "sí" a # 15, proporcionar información acerca de una persona de contacto en la agencia / tribunal donde se presentó la queja.		
Nombre: _____		
Título: _____		
Agencia: _____		
Dirección: _____		
Teléfono: _____		Dirección de correo electrónico: _____
Parte VI:		
Nombre de la Agencia de Transito de cual la queja está en contra: _____		
Persona de contacto: _____		
Teléfono: _____		

Puede adjuntar cualquier material escrito o cualquier otra información que usted considere relevante para su queja.

Su firma y fecha son requeridas abajo para completar el formulario:

Firma _____ Fecha _____

Después de completar la solicitud, por favor, envíe por correo o entréguela en persona a la siguiente dirección:

San Benito County Local Transportation Authority
 Attn: Title VI Complaint
 330 Tres Pinos Road, Suite C7
 Hollister, CA 95023

Public Participation Plan

The San Benito County Local Transportation Authority is committed to informing and involving the public in the planning a delivery of its public transit services in its service area. In collaboration with the Association of Monterey Bay Area Governments (AMBAG), the *Monterey Bay Area Public Participation Plan* was created for member agencies to use in the Monterey Bay Area Region.

Purpose

The San Benito County Local Transportation Authority uses the methodologies described in the *Monterey Bay Area Public Participation Plan* to guide all public involvement activities to ensure that the community is informed and given a chance to be involved.

Population of San Benito County

Demographic

According to the United States Census 2018 American Community Survey Five-Year Estimates¹, San Benito County's population size is 59,416.

Approximately, 26% of the population is under the age of 18 and 12% of the population is 65 years old or older.

There are 14,918 households in San Benito County. The median household income was \$73,814 while the Per Capita Income was \$25,508. Additionally, 9% of the County's population is considered to be below or at the Federal Poverty Level. Of the total number of households, 424 households do not own a personal vehicle.

Race and Ethnicity in San Benito County	
Hispanic or Latin	
White Alone	47.2%
Black or African American Alone	0.1%
American Indian and Alaska Native Alone	0.4%
Asian Alone	0.1%
Native Hawaiian and Other Pacific islander Alone	0.1%
Some Other Race Alone	8.3%
Two or More Races	3.2%
Not Hispanic or Latino	
White Alone	34.9%
Black or African American Alone	0.7%
American Indian and Alaska Native Alone	0.3%
Asian Alone	2.9%
Native Hawaiian and Other Pacific islander Alone	0.1%
Some Other Race Alone	0.1%
Two or More Races	1.5%

San Benito County Demography

Source: U.S. Census 2018 American Community Survey Five-Year Estimates Detailed Table B03002

County Express Service Area

County Express service area comprises the Cities of Hollister and San Juan Bautista, some areas of northern San Benito County and two bus stops in the City of Gilroy in Santa Clara County. The bus stops are located at Gavilan College and also the Gilroy Transit Station.

All County Express services are open to the public except for its Paratransit service. A person must have a disability that prevents him/her to from accessing Fixed Route services within $\frac{3}{4}$ of a mile. The LTA is responsible for determining the eligibility for residents in San Benito County and authorizing visitor usage from other counties.

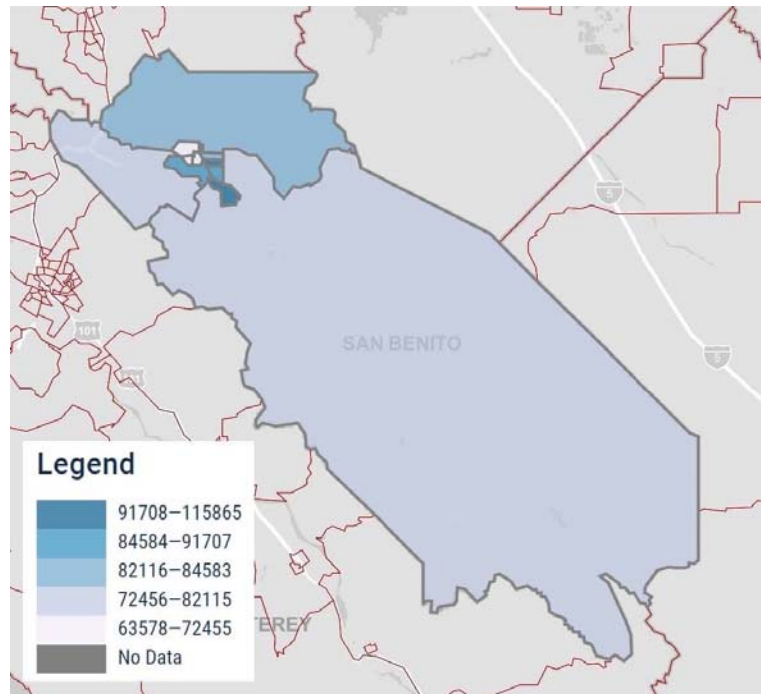
¹ U.S. Census Bureau. 2018 American Community Survey Five-Year Estimates Detailed Tables: S0101, B19049, B05010, B19301, B17001, S2504. Web. 8 Sept 2020. <https://www.census.gov/data.html>.

Specialized Transportation Service Area

The LTA provides door-through-door specialized transportation for persons over the age of 60 and/or have a disability. The service is open to all eligible residents of San Benito County, making the service area approximately 1,390 square miles. Eligibility of this service is determined by its operator.

Data Deficiency

The LTA does not track the racial and ethnicity makeup of its riders, which resulted in the limited analysis. As result, the LTA is unable to fully analyze the impacts of fare increases. The LTA plans to include additional questions regarding racial and ethnic makeup of its riders on new surveys it will conduct. The information would be used to in future analyses of fares and services.



Median Household Income By Census Tract

Source: U.S. Census 2018 American Community Survey Five-Year Estimates
Detailed Table S1903

Public Participation Process

Approach to Public Participation

The public participation process should be considered at the earliest stages of any LTA project that may impact the surrounding community, its riders, and potential riders. As projects vary in time and size, the public participation process may vary for each, as well as the extent of public participation. The following outlines tools and strategies to ensure that public input is invited and all foreseeable impacts to the community are considered.

Outreach Requirements and Activities

The following activities are intended to serve as guidelines for minimum levels of outreach to ensure that all riders and potential riders in San Benito County have equal access and opportunity to participate in transportation planning and decision-making. These also provide current strategies for soliciting input and engaging various communities. Below is a list of outreach methods that the LTA currently uses to inform the public:

- Notice for public events include flyers posted on social media, at bus stops and onboard buses.
- Notices are posted prior to the public event.
- Notices are posted at the LTA Office at key community centers with whom LTA has a partnership.
- Information about public participation opportunities are posted on LTA's website and Facebook account prior to the event.

- Comments are accepted via public outreach events, email, mail, fax, social media (i.e. Facebook), and by phone to ensure that all populations have the opportunity to participate.

Summary of Outreach Efforts Made Since Last Title VI Submission

Outreach LTA efforts include:

- Conducted several public meetings and outreach during the development of the Transit ITS Plan and Highway 25 Transit Corridor Study;
- Conducted public hearings and meetings on the development of the 2018 Regional Transportation Plan which includes a component on public transit;
- Conducted several year round Ad hoc outreach efforts with the Social Services Transportation Advisory Council;
- Conduct annual Unmet needs processes as required by state statute to conduct a formal hearing process that solicits information about transit needs. This allows the county San Benito Council of Governments in partnership with the LTA to make a determination as to whether these are unmet transit needs and whether these are transit needs that can be reasonably met;
- Outreach for Coordinated Plan Updates, as needed.

Outreach Methods to Engage Minority and Limited English Proficient Populations

Currently, Spanish is the only quantifiable population within LTA's service area that is limited English proficient. The LTA will continue assessing the language needs of citizens in its service area through its Language Assistance Plan. At such time, as another group with limited English proficiency reaches significant mass, the LTA will review this plan and its strategies to engaging with non-English speaking populations. Below are the methods that the LTA are currently using:

- Notices are translated to Spanish and posted along side English notices at the administration offices, onboard buses, and online.
- Event information on LTA's website is posted in English and Spanish.
- LTA distributes event information to community groups and agencies that work with LEP populations, if such contacts exist.
- As identified in its Language Assistance Plan, the LTA has full time staff to provide language assistance for customers and callers that are Spanish speaking.
- Spanish interpretation or translation is provided at any public meetings or workshop.

Non-Elected Committees and Councils

The San Benito County Local Transportation Authority strives to appoint diverse group of community representatives to its advisory committees.

The Board of Directors is comprised of locally elected officials that were appointed to the San Benito County Local Transportation Authority's Board of Directors from their respective

jurisdictions. The Board is comprised of two representatives from the Board of Supervisors, two representatives from the City of Hollister and one representative from the City of San Juan Bautista.

The Social Service Transportation Advisory Council (SSTAC) advises the Council of Governments and the Local Transportation Authority on matters related to transportation accessibility for the elderly, the disabled, and persons of limited means. Transit issues that may require the Advisory Council to look into are specialized transportation services, planning, and studies. Members are appointed by the Council of San Benito County Governments.

The San Benito County Bicycle and Pedestrian Advisory Committee (BPAC) was established to advise the Council of Governments on bicycle and pedestrian needs and concerns in the San Benito County area. The San Benito County Local Transportation Authority also seeks the Committees' comments on transit projects that could potentially affect bicyclists and pedestrians. Members are appointed by the Council of San Benito County Governments.

The Technical Advisory Committee (TAC) was established to provide technical assistance, advice, and recommendations to the Council of Governments on transportation planning studies and related transportation projects. Members consists of staff from local government agencies and are appointed to by the Council of San Benito County Governments.

	Board of Directors	Social Services Transportation Advisory Council	Bicycle & Pedestrian Advisory Committee	Technical Advisory Committee
Black, African American	0%	0%	0%	14%
Asian	0%	0%	0%	0%
White	0%	40%	62.50%	72%
American Indian, Alaska Native	0%	20%	0%	0%
Native Hawaiian, Other Pacific Islander	0%	0%	0%	0%
Some Other Race	60%	20%	0%	0%
Decline to State	40%	20%	37.50%	14%
Hispanic, Latino, Spanish origin	60%	0%	12.50%	0%

Membership of Non-Elected Committees and Councils

Language Assistance Plan (LAP)

The San Benito County Local Transportation Authority prepared a Language Assistance Plan (LAP) to address its responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. LAP has been prepared in accordance with Title VI of the Civil Rights Act of 1964, Federal Transit Administration Circular 4702.1B dated October 1, 2012, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled “Improving Access to Services for Persons with Limited English Proficiency”, indicates that differing treatment based upon a person’s inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

Plan Summary

The LTA operates and administers County Express and Specialized Transportation and has developed the LAP to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by LTA. County Express operates traditional public transit services: Fixed Route, Paratransit, Dial-A-Ride, and Intercounty. Specialized Transportation provides personalized services: Out-of-County Non-Emergency Medical Services, Senior Lunch Transportation Program, and Medical Shopping Assistance Program.

The LAP outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify Limited English Proficiency (LEP) persons that assistance is available.

In order to prepare this plan, the LTA undertook the U.S. Department of Transportation (U.S. DOT) four-factor LEP analysis which considers the following factors:

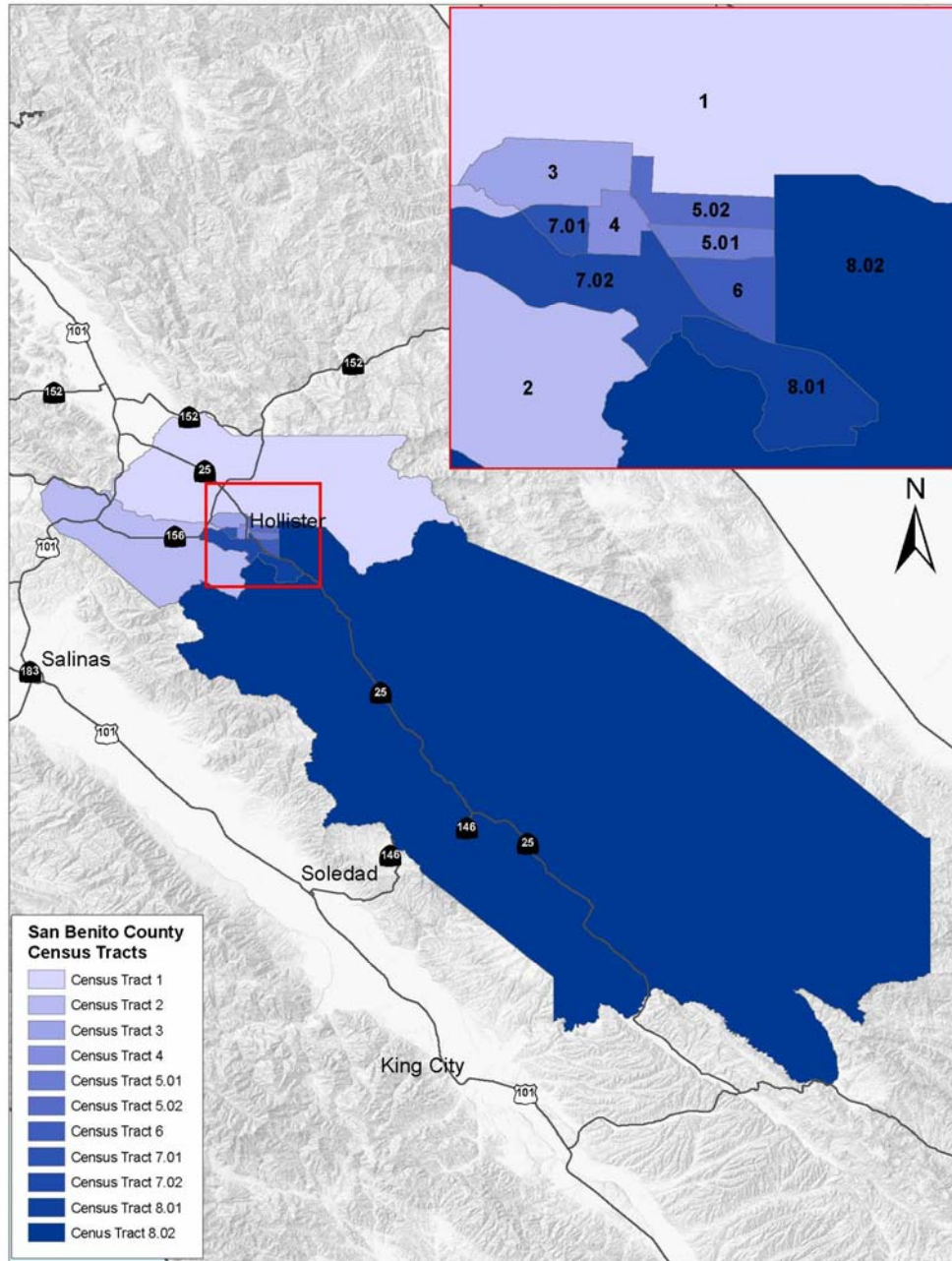
1. *Potential Number of LEP Persons Served* – The number or proportion of LEP persons in the service area who may be served or are likely to encounter a LTA program, activity or service.
2. *Service Contact Frequency of LEP Persons* – The frequency with which LEP persons come in contact with LTA programs, activities or services.
3. *Significance of Programs to LEP Persons* – The nature and importance of programs, activities or services provided by LTA to the LEP population.
4. *Available Resources for LEP Assistance* – Available resources to the LTA and overall costs to provide LEP assistance.

A summary of the results of the LTA four-factor analysis is in the following section.

Four – Factor Analysis

1. Potential Number of LEP Persons Served

The LTA used past experiences and consulted to the U.S. Census to determine the likelihood that the LEP population would use an LTA program or service. Due to the rural population of San Benito County, the smallest geographical area for identification is the use of Census Tracts. Eleven Census Tracts are fully, or partially, located in the service area for County Express. All eleven Census Tracts were fully located in the service area for its Specialized Transportation Services.



San Benito County Census Tracts

Source: Association of Monterey Bay Area Governments

San Benito County Census Tract												
	1	2	3	4	5.01	5.02	6	7.01	7.02	8.01	8.02	% of Total Population
Spanish	540	652	1,315	1,735	631	1,124	733	1,296	473	33	313	16.51%
Other Indo-European	15	50	0	0	0	41	147	0	57	5	0	0.59%
Asian and Pacific Island	32	21	26	0	30	46	93	0	19	7	9	0.53%
All Other	0	0	0	44	0	0	0	0	4	0	0	0.09%

Number of Individuals That Speak English "Less Than Very Well" By Census Tract in San Benito County
 Source: 2011-2015 American Community Survey 5 Year Estimates Detailed Table B16001

2. Service Contact Frequency of LEP Persons

The LTA has assessed the frequency in which staff, drivers, and dispatchers have, or could have, contact with LEP persons. This assessment included speaking with the staff, drivers, and dispatchers regarding their interactions with LEP persons. To date, drivers and staff have the most frequent in-person contact with LEP persons. The LTA requires its operations contractor to have at least 50% of its drivers and dispatchers to be bilingual in Spanish and English and to be available during service hours. Currently, LTA staff has three people that are bilingual in Spanish and English and are available throughout the day during business hours to LEP persons.

Information regarding fares and holiday service are posted in the vehicles, LTA Administration Office, and online (http://www.sanbenitocountyexpress.org/home_es.html) in Spanish. If LTA staff is not available to provide translation, an interpreter is used at various public meetings in which a large group of LEP persons are anticipated.

3. Significance of Programs to LEP Persons

San Benito County has two incorporated cities: Hollister and San Juan Bautista. However, three unincorporated towns and a large gated community are within the service area: Aromas, Tres Pinos, Paicines, and Ridgemark.

All County Express services are more likely to encounter LEP individuals in Hollister, San Juan Bautista, Tres Pinos and Ridgemark due to its limited service area. The service area for Specialized Transportation encompasses the entire County and is likely to encounter LEP individuals in its service area. The LTA Administration office would also be a likely place to encounter LEP individuals because the office handles Paratransit eligibility and pre-purchased fare sales. According to the census, the largest concentration of LEP individuals in the entire service area speaks Spanish.

4. Available Resources for LEP Assistance

The LTA currently translates its printed materials regarding fares and service changes into Spanish for its LEP population. Basic translation and interpretation is provided to the LTA by staff. However, more complex professional interpretation or translation services are provided.

The LTA will continue to include a clause that requires its operations contractor to employ bilingual staff to ensure that LEP riders have the opportunity to receive assistance in Spanish.

Implementation

The LTA developed its LEP Implementation Plan based upon the issues that were raised during the four-factor Analysis. The LEP Implementation Plan will provide details on how various items will be addressed by the LTA.

Identifying LEP Individuals Who Need Language Assistance

The LTA will continually monitor the language needs of the LEP individuals within its service area. The LTA will do the following:

- Continue to monitor the languages and English proficiency encountered by front-line staff (dispatchers, drivers, and front-office staff).
- Continue to have a section regarding preferred language for Paratransit applicants. Current application materials have English, Spanish and Other. The applicant, or a person assisting the applicant, may write in an unlisted language.
- Continue to contractually require operations contractors maintain at least 50% of staff to be bilingual in Spanish and to be available throughout the service hours
- For languages other than Spanish, staff will attempt to identify the LEP person's preferred language using the 2010 U.S. Census "I Speak" Identification cards
- Continue to use data available from the U.S. Census, state, and local demographic data.

Language Assistance Measures

The LTA has oral and written language assistance available to LEP persons on its vehicles, operations and administration offices. LTA staff can respond to LEP Persons inquiries in person, by telephone or in writing. To enhance the available language assistance, the LTA currently will provide the following:

- Work with local social services agencies and organizations to provide services to LEP persons to disseminate information about LTA's services
- Continually identify new agencies or organizations that can assist in disseminating information about LTA's services
- Include a statement in notices regarding the availability of interpreting services at community events, public hearings and Board of Directors meetings with seven day advance notice
- Communicate with drivers, dispatchers, and other front-line staff regarding their experience concerning contacts with LEP persons
- Post LTA's Title VI Policy and Complaint form on the agency's website at English: www.SanBenitoCountyExpress.org/TitleVI.html
- Spanish Title VI Policy and Complaint Form: http://www.sanbenitocountyexpress.org/TitleVI_es.html
- Provide trip planning services to LEP persons with assistance of bilingual staff

- Operations contractors maintain at least 50% of staff to be bilingual in Spanish and to be available throughout the service hours
- All notices regarding fares, service changes, and policies are translated in Spanish
- When an interpreter is needed for a language other than Spanish, in person or on the telephone, staff will attempt to access language assistance from a professional translation service or qualified community volunteers.

Translation of Vital Documents and Safe Harbor Provision

According to the 2011-2015 American Community Survey 5 Year Estimates, there are 57,337 people in San Benito County. There were 9,491 individuals that spoke English ‘less than very well.’ The table below shows the breakdown of the major language groups spoken in San Benito County by Census Tract. As demonstrated in the table on page 19, Spanish is the only language that falls outside of the Safe Harbor Provision of over 5% or 1,000 individuals (whichever is less). The Authority currently provides the following documents in English and Spanish:

- Title VI Notice to the Public, Complaint Procedures, and Complaint Form
- Transit maps and schedules in print and on website
- ADA Paratransit eligibility application
- Courtesy Card application
- Public notices related to service changes and projects

San Benito County Census Tract												
	1	2	3	4	5.01	5.02	6	7.01	7.02	8.01	8.02	% of Total Population
Spanish	540	652	1,315	1,735	631	1,124	733	1,296	473	33	313	16.51%
Other Indo-European	15	50	0	0	0	41	147	0	57	5	0	0.59%
Asian and Pacific Island	32	21	26	0	30	46	93	0	19	7	9	0.53%
All Other	0	0	0	44	0	0	0	0	4	0	0	0.09%

*Number of Individuals That Speak English “Less Than Very Well” By Census Tract in San Benito County
Source: 2011-2015 American Community Survey 5 Year Estimates Detailed Table B1 6001*

The LTA will continue to monitor the proportions of LEP individuals languages and will translate vital documents in additional languages should additional languages fall outside of the Safe Harbor Provision.

Staff Training

The LTA does not have a formal training program. However, it requires operations contractors to maintain its staffing so that at least 50% speak Spanish. LTA administration office currently has three full time Spanish speaking staff that is able to address Spanish speaking client concerns. The LTA strives to schedule its staff so that there is someone who can speak Spanish during normal

business hours. The LTA staff is trained to communicate with Spanish speaking clients in a respectful and professional manner.

The LTA will develop a standard training session for its staff and operations contractors on the following topics:

- How to respond to LEP callers
- How to respond to correspondence from LEPs
- How to respond to LEPs in person
- How to document LEP needs
- How to respond to civil rights complaints

Public Involvement

Should the LTA produce a document that LEP individuals may read or schedule an event that may have LEP individuals in attendance, or may have interest in, the LTA shall have the documents, meeting notices or flyers, printed in an alternate language based on the known LEP population. Interpreters will be available on an as needed basis.

Monitoring and Updating the LEP Plan

The LTA review and update its LEP plan every three years. At a minimum, the Plan will be reviewed and updated when new data from the most current U.S. Census is available, or when the concentrations of LEP individuals presence in the LTA service area is observed. Updates may include, but will not be limited to, the following:

- Description of any new concentrations of LEP individuals based on ongoing monitoring of front-line staff interactions with clients
- Updated analysis of the current LEP population within the service area
- Assessment of the need for translation services
- Assessment of the effectiveness and success of current language assistance programs
- Determine whether financial resources are sufficient to fund language assistance resources
- Determine whether the LTA has fully complied with the goals of this LEP Plan
- Determine whether complaints received are an effect of the LTA's inability to meet the needs of the LEP individuals
- Update procedures or contact information

Notice to LEP Persons

A link to the LTA's Title VI Procedures and LEP Plan is available on the County Express website at www.SanBenitoCountyExpress.org. Any person or agency with internet access will be able to access and download the Plan from the abovementioned website. Alternatively, any person or agency may request a copy of the Plan via telephone, fax, 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 LTA will provide, if feasible. ***La Autoridad de Transporte Local se traducirá el Plan de Dominio Limitado de Inglés en español, si se le pide.***

Questions or comments regarding the LEP Plan may be submitted to the San Benito County Local Transportation Authority's Title VI Administrator:

San Benito County Local Transportation Authority
Attn: Title VI Administrator
330 Tres Pinos Road, Suite C7
Hollister, CA 95023

Phone: 831.637.7665

Fax: 831.636.4160

Title VI Facilities Equity Analysis

Per 49 CFR 21.9(b)(3), the San Benito County Local Transportation Authority may not select the site or location of facilities with the purpose or effect of excluding persons from, denying the benefits of, or subjecting them to discrimination on the basis of race, color, or national origin. Per 49 CFR 21, (The Public Participation Plan), the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.

Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, and operations centers. Bus shelters are not included in this provision as they are considered transit amenities. Transit stations, power substations and similar facilities are not included in this provision as they are evaluated during project development and the NEPA process.

For facilities covered by this provision, the San Benito County Local Transportation Authority is required to:

- Complete a Title VI equity analysis during the planning state with regard to where a project is located to ensure the location is selected without regard to race, color, or national origin, and engage in outreach to persons potentially impacted by site of the facilities. The Title VI equity analysis must compare the equity impacts of various site alternatives, and the analysis must occur before the selection of the preferred site.
- Give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure proper analysis of localized impacts.
- Provide substantial legitimate justification for locating a project in a location that will result in a disparate impact on the basis of race, color, or national origin, and show that there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. In order to show that both tests have been met, the recipient must consider and analyze alternatives to determine whether those alternatives

would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

The San Benito County Local Transportation Authority has no current or anticipated plans to develop new transit facilities covered by these requirements.

System-Wide Standards and Policies

The San Benito County Local Transportation Authority strives to meet the following system-wide standards so no person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of service of transportation service on the basis of race, color, or national origin (49 CFR 21, Appendix C). Specifically, frequency of service, age and quality of transit vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color, or national origin.

Vehicle Load Standards

Vehicles during the peak period should exceed 1.5 passengers per seat. During off peak periods, vehicles should not exceed 1.0 passengers per seat.

Vehicle Headway Standards

Vehicle headways are determined based on ridership demand, service type, time of day, and day of the week.

Weekday (Monday-Friday)

For Fixed Route services, vehicle headways are 35-50 minutes. Each Fixed Route consists of one bus make a circuitous run and the headway is determined by how fast each bus completes the run. This results in larger headways for the longer routes and shorter headways for the shorter routes.

For Intercounty Gavilan, morning peak period headways are 20 minutes and evening Peak period is 60 minutes. This service primarily serves the students at Gavilan College, a community college. The trend has required the need to provide intense service in the morning for the students to go to the early classes. The evening peak schedule is less frequent than the morning service because there is no set dismissal time for each student. Students determine their own schedules and class load, resulting in a staggered peak demand.

Intercounty Caltrain is dependent on the Caltrain train schedule. This service is a direct connector to Caltrain service that runs from San Francisco to Gilroy, crossing three other counties. The frequency of this service is determined by that particular service.

Weekend (Saturday-Sunday)

There is no Fixed Route, Intercounty Gavilan, or Intercounty Caltrain service during the weekend. Intercounty Greyhound has a total of four roundtrips. There are two in the morning and two in the afternoon.

On-Time Performance Standards

At least 85% of scheduled arrivals will be on-time (within 5 minutes).

Service Availability Standards

90% of dwelling units in areas having six or more units per acre shall be located within ¼ mile of Fixed Route Bus Stop.

Vehicle Assignment Policy

Vehicles are assigned to routes based on ridership demands. Specific vehicles are assigned to routes only when required by operating conditions. For example, in cases where a smaller bus is required to provide service on narrower street.

Transit Amenities Policy

The LTA developed and adopted guidelines for its staff, local planning jurisdictions and developers to use in developing transit friendly designs. The guidelines are readily available online for all to view at: www.SanBenitoCountyExpress.org/news.html.

All new bus stops and improvements to existing bus stops are subject to constraints related to safety, ADA compliance, availability of funding, and other factors. Below is a table that summarizes the amenities for different types of bus stops.

Types of Stops	Minimum Amenities
High number of boarding	Bus stop sign Bus stop shelter with seating, space for wheelchair, lighting, transit information, and trash receptacle
New bus stop at new development	Bus stop sign Bus stop shelter with seating, space for wheelchair, lighting, transit information, and trash receptacle
Low boarding or stops with only alighting activity	Bus stop sign Transit information

In 2016, the LTA completed a Bus Stop Improvement Plan that includes an inventory all existing and potential new bus stops. The Plan identifies the needs of each bus stop and provides cost estimates to make each improvement.

Board of Directors Approval of San Benito County Local Transportation Authority's Title VI Program



BEFORE THE SAN BENITO COUNTY LOCAL TRANSPORTATION AUTHORITY

RESOLUTION OF THE SAN BENITO COUNTY LOCAL)	RESOLUTION NO: 20-05
TRANSPORTATION AUTHORITY BOARD OF)	
DIRECTORS ADOPTING THE SAN BENITO COUNTY)	
LOCAL TRANSPORTATION AUTHORITY'S 2020 TITLE)	
VI COMPLIANCE PROGRAM)	

WHEREAS, the San Benito County Local Transportation Authority (LTA) desires to comply with Title VI of the Civil Rights of 1964, including provisions detailed in U.S. Department of Transportation's Federal Transit Administration Circular 4702.1B, "Title VI Requirement and Guidelines for the Federal Transit Administration Recipients"; and

WHEREAS, the LTA Board of Directors wishes to adopt the 2020 Title VI Compliance Program developed by staff, attached hereto and incorporated herein by reference as Exhibit A, in order to comply with the necessary provisions of the Civil Rights Acts; and

NOW, THEREFORE, BE IT RESOLVED, by the San Benito County Local Transportation Authority Board of Directors as follows:

1. The Board of Directors hereby adopts the San Benito County Local Transportation Authority's 2020 Title VI Program (Exhibit A);
2. The LTA Executive Director or his/her designee is authorized to implement components of the Program in order to meet the federal requirements;
3. The LTA Executive Director or his/her designee is authorized to implement policies that may be necessary to comply with subsequent revisions or interpretations to the Civil Right Act.

PASSED AND ADOPTED BY THE SAN BENITO COUNTY LOCAL TRANSPORTATION AUTHORITY on this 17th day of September 2020, by the following vote:

AYES: Chair Velazquez, De La Cruz, Resendiz, Vazquez Edge, and Hernandez
NOES: 0
ABSENT: 0
ABSTAIN: 0

Ignacio Velazquez, Chair

ATTEST:
Mary Gilbert, Executive Director

By:
Dated: 9/18/20

APPROVED AS TO LEGAL FORM:
San Benito County Counsel's Office

By:
Shirley L. Murphy, Deputy County Counsel
Dated: Sept. 10, 2020