



**Tuolumne County Transit Agency**

# **TITLE VI PROGRAM**

**Approved by the Tuolumne County Transit Agency  
August 2023**

**975 Morning Star Dr. Ste A Sonora CA 95370**

**[www.tuolumnecountytransit.com](http://www.tuolumnecountytransit.com)  
[www.facebook.com/TuolumneCountyTransit](https://www.facebook.com/TuolumneCountyTransit)**

## INTRODUCTION

This document was prepared by the Tuolumne County Transit Agency staff to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation’s FTA Circular 4702.1B, “Title VI Requirement and Guidelines for Federal Transit Administration Recipients.”

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## Tuolumne County Transit Agency Title VI Notices to the Public

Notifying the Public of Rights under Title VI

### **Tuolumne County Transit Agency**

- The Tuolumne County Transit Agency 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 Tuolumne County Transit Agency.
- For more information on the Tuolumne County Transit Agency civil rights program, and the procedures to file a complaint, contact 209.533.5603, or visit our administrative office at 975 Morning Star Dr., Suite A, Sonora CA 95370 . For more information, visit [www.tuolumnecountytransit.com](http://www.tuolumnecountytransit.com) or email [transcouncil@co.tuolumne.ca.us](mailto:transcouncil@co.tuolumne.ca.us)
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
- If information is needed in another language, contact 209-533-5603.

Notificar al público de los derechos bajo el título VI

### **Tuolumne County Transit Agency**

- Tuolumne County Transit Agency 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 Tuolumne County Transit Agency
- Para obtener más información sobre el programa derechos civiles capaz de industrias y el procedimientos para presentar una queja, llame al 209.533.5603, o visite nuestra oficina administrativa en 975 Morning Star Dr., Suite A, Sonora CA 95370. Para más información información, visite [www.tuolumnecountytransit.com](http://www.tuolumnecountytransit.com) or email [transcouncil@co.tuolumne.ca.us](mailto:transcouncil@co.tuolumne.ca.us)
- 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 209-533-5603.

## List of Locations Where Title VI Notice Is Posted

Tuolumne County Transit Agency notice to the public is currently posted at the following locations:

Location Name	Address	City
Offices	975 Morning Star Dr. Suite A Sonora CA 95370	Sonora
Vehicles	13033 Sanguinetti Road Sonora, CA 95370	Sonora
Transit Center	12879 Justice Center Drive Sonora, CA 95370	Sonora

The Title VI notice and program information is also provided on the Tuolumne County Transit website at: [www.tuolumnecountytransit.com](http://www.tuolumnecountytransit.com)

## **Title VI Complaint Procedures**

As a recipient of federal dollars, the Tuolumne County Transit Agency is required to comply with Title VI of the Civil Rights Act of 1964 and ensure that services and benefits are provided on a non-discriminatory basis. The Tuolumne County Transit Agency has in place a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in the Federal Transit Administration Circular 4702.1B, dated October 1, 2012.

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the Tuolumne County Transit Agency may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. The Tuolumne County Transit Agency investigates complaints received no more than 180 days after the alleged incident. The Tuolumne County Transit Agency will only process complaint forms that are complete.

Within 10 business days of receiving the complaint, the Tuolumne County Transit Agency will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office. The Tuolumne County Transit Agency has 30 days to investigate the complaint. The complainant will be notified in writing of the cause to any planned extension to the 30-day rule.

If more information is needed to resolve the case, the Tuolumne County Transit Agency may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, the Tuolumne County Transit Agency can administratively close the case.

A case can also be administratively closed if the complainant no longer wishes to pursue their case. After the investigator reviews the complaint, she/he will issue one of two letters 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 member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 10 business days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

## Tuolumne County Transit Agency Title VI Complaint Form

### COMPLAINT FORM

<b>Section I: Please write legibly</b>		
1. Name:		
2. Address:		
3. Telephone:	3.a. Secondary Phone <i>(Optional)</i> :	
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
<b>Section II:</b>		
6. Are you filing this complaint on your own behalf?	YES*	NO
*If you answered "yes" to #6, go to Section III.		
7. If you answered "no" to #6, 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
<b>Section III:</b>		
11. I believe the discrimination I experienced was based on <i>(check all that apply)</i> :		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin
12. Date of alleged discrimination: <i>(mm/dd/yyyy)</i>		

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 attach additional sheets of paper.

<b>Section IV:</b>		
14. Have you previously filed a Title VI complaint with the Tuolumne County Transit Agency?	YES	NO
<b>Section V:</b>		
15. Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? <input type="checkbox"/> YES* <input type="checkbox"/> NO If yes, check all that apply: <input type="checkbox"/> Federal Agency _____ <input type="checkbox"/> State Agency _____ <input type="checkbox"/> Federal Court _____ <input type="checkbox"/> Local Agency _____ <input type="checkbox"/> 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:

<b>Section VI:</b>
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:

Tuolumne County Transit Agency, Title VI Coordinator  
2 South Green Street  
Sonora CA, 95370

**Formulario de queja de la** Agencia de Tránsito del Condado de Tuolumne

**FORMULARIO DE QUEJA**

<b>Sección I: Por favor, escriba legiblemente</b>		
1. Nombre:		
2. Dirección:		
3. Numero de Teléfono:	3.a. Numero de teléfono secundario <i>(opcional)</i> :	
4. Dirección de correo electrónico:		
5. ¿Requisitos de formato accesible?	<input type="checkbox"/> Impresión grande	<input type="checkbox"/> Cinta de audio
	<input type="checkbox"/> TDD	<input type="checkbox"/> Otros
<b>Sección II:</b>		
6. ¿Está presentando esta queja en su propio nombre?	Sí*	No
*Si respondió "sí" al #6, vaya a la Sección III.		
7. Si respondió "no" al #6, ¿cuál es el nombre de la persona por la cual está presentando esta queja? Nombre:		
8. ¿Cuál es su relación con este individuo:		
9. Por favor explique por qué ha presentado una pregunta para un tercero:		
10. Confirme que ha obtenido el permiso de la parte agraviada para presentar su nombre.	Sí	No
<b>Sección III:</b>		

<p>11. Creo que la discriminación que experimenté se basó en <i>(marque todas las que correspondan)</i>:</p> <p><input type="checkbox"/> Raza <input type="checkbox"/> Tono de piel <input type="checkbox"/> Origen nacional</p>
<p>12. Fecha de la presunta discriminación: <i>(mm/dd/aaaa)</i></p>
<p>13. Explique lo más claramente posible lo que sucedió y por qué cree que fue discriminado. Describa a todas las personas involucradas. Incluya el nombre y la información de contacto de la(s) persona(s) que lo discriminó (si se conoce), así como los nombres y la información de contacto de cualquier testigo. Si se necesita más espacio, adjunte hojas de papel adicionales.</p>

<b>Sección IV:</b>		
14. ¿Ha presentado previamente una queja del Título VI ante la Agencia de Tránsito del Condado de Tuolumne?	Sí	No
<b>Sección V:</b>		
<p>15. ¿Ha presentado esta queja ante cualquier otra agencia federal, estatal o local, o ante cualquier tribunal federal o estatal?</p> <p><input type="checkbox"/> Sí* <input type="checkbox"/> NO</p> <p>Si la respuesta es si, marque todas las que correspondan:</p> <p><input type="checkbox"/> Agencia Federal _____ <input type="checkbox"/> Agencia Estatal _____</p> <p><input type="checkbox"/> Tribunal Federal _____ <input type="checkbox"/> Agencia Local _____</p> <p><input type="checkbox"/> Tribunal de Estado _____</p>		
<p>16. Si respondió "sí" a #15, proporcione información sobre una persona de contacto en la agencia/tribunal donde se presentó la queja.</p>		
Nombre:		

Título:	
Agencia:	
Dirección:	
Numero de teléfono:	Correo electrónico:

<b>Sección VI:</b>
El nombre de la Agencia de Tránsito de la cual se está quejando:
Persona de contacto:
Numero de teléfono:

Puede adjuntar cualquier material escrito u otra información que crea que es relevante para su queja.

Para completar el formulario, la firma y la fecha se requieren a continuación:

Signature \_\_\_\_\_ Date \_\_\_\_\_

Por favor entregue este formulario en persona o envíe este formulario a la siguiente dirección:

Agencia de Tránsito del Condado de Tuolumne, Coordinador del Título VI  
2 South Green Street  
Sonora CA, 95370

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

The Tuolumne County Transit Agency has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.

### **Tuolumne County Transit Agency List of Investigations, Lawsuits and Complaints**

Type of Process	Date	Summary (including basis of complaint)	Status	Action(s) Taken
Investigations				
1. <i>None</i>				
2.				
Lawsuits				
1. <i>None</i>				
2.				
Complaints				
1. <i>None</i>				
2.				

## **Public Participation Plan**

### ***About the Tuolumne County Transit Agency***

The Tuolumne County Transit Agency (TCTA) is a joint powers authority that is responsible for the Tuolumne County Regional Public Transportation System, Tuolumne County Transit. Tuolumne County Transit provides general public and specialized transit services. Services include fixed route and demand response (Dial-A-Ride) services. Priority service on Dial-A-Ride is provided to elderly and disabled persons. The TCTA coordinates its transit program with various social service organizations and other agencies to maximize public transportation opportunities to the transit dependent population.

### ***Mission Statement***

*To provide safe, efficient, reliable, high quality and effective public transportation for residents and visitors, which enhances the community and ensures viable mobility options.*

All meetings of the TCTA and its advisory committees are open to the public. Meeting information and agendas are available to the public on the website, [www.tuolumnecountytransportationcouncil.org](http://www.tuolumnecountytransportationcouncil.org). Agendas are posted at various County Administration buildings and are also available by request at the TCTA office (975 Morning Star Dr. Suite A., Sonoma CA) or by email [transcouncil@co.tuolumne.ca.us](mailto:transcouncil@co.tuolumne.ca.us).

### ***Purpose of this Plan***

Public participation is the process through which stakeholders can partake directly in agency decision-making, and express their concerns, desires, and values. It is the goal of this agency to improve the lives of people with disabilities by creating opportunities to maximize their independence. At every opportunity through prescribed methods the agency will solicit input from stakeholders in order to best support persons served without creating disproportionately high and adverse human health or environmental effects on minority and/or low-income populations.

### ***Summary of Outreach Efforts***

The following is a summary of outreach efforts conducted by the Tuolumne County Transit Agency as they relate to Title VI requirements under the Public Participation Plan. Many of our activities are conducted in partnership or through ad hoc outreach with other social and human service organizations and non-profit agencies within the community. This is in no way a complete list but rather documents the agency's outreach efforts as they relate specifically to minority and low-income populations.

### **Board Meetings Open to the Public**

Tuolumne County Transit Agency monthly Board meetings are open to the public. Agendas are posted on the agency's website, outside County Administration buildings and are available by request.

### **Tuolumne County Office of Emergency Services**

Tuolumne County Transit Agency worked in conjunction with the Tuolumne County Office of Emergency Services for several years to develop the Tuolumne County Transportation Emergency Operations Plan. This plan specifically addresses the needs of populations at risk including the elderly, disabled, minority and low-income during an emergency. This partnership developed a coordinated plan to provide transportation when evacuations are necessary during an emergency event.

### **Annual Unmet Transit Needs Surveys**

Tuolumne County Transportation Council conducts an annual unmet transit needs process. This process includes coordination with the Social Service Transportation Advisory Council (SSTAC), a public hearing and distribution of surveys to program participants and stakeholders of the transit system to determine input regarding unmet needs. The SSTAC aides in the distribution and collection of surveys and provides a recommendation to the board regarding unmet transit needs findings.

The Tuolumne County Transit Agency receives comments, complaints and service suggestions throughout the year and responds to them either immediately or in the unmet transit needs process, as appropriate.

### **Tuolumne County Transit Website**

Tuolumne County Transit Agency posts service information, important documents and policies, notices and announcements on Tuolumne County Transit's website.

### **Marketing Plan**

The TCTA developed a comprehensive strategic marketing plan. This plan is focused toward building awareness of Tuolumne County Transit services to the local community and improving the understanding of using public transportation. The goal of the plan is to promote a healthy life style and build a positive community image to residents and visitors of the County.

### **Various Planning and Outreach Projects and Programs/Grant submittal**

The TCTA/TCTC participate in planning efforts such as the Coordinated Public Transit-Human Service Transportation Plan, Short Range Transit Plan and grant submittals that require collaboration with and input from under-represented members and Disadvantaged populations within Tuolumne County. These activities provide additional opportunities for understanding and communicating with key demographics which are known to be under-represented historically.

**The following is a summary of the public outreach and involvement activities undertaken by the TCTA since the last submission and a description of steps taken to ensure that minority and low-income people had meaningful access to these activities.**



## **Outreach efforts 2021-2023**

### **2021**

- Unmet Transit Needs Hearing
- Spoke at the Senior Center and other various senior networks
- Made local radio/television commercials as well as social media posts
- Made transit free. Fixed route and dial-a-ride

### **2022**

- 49er festival
- Held special presentations for the local hospital and churches
- Community roots resource fair
- Unmet Transit Needs Hearing
- Radio/television/social media outreach
- Transit still free

### **2023**

- Health Fair
- Community roots resource fair
- Unmet Transit Needs Hearing
- 49er festival
- Transit still free

The TCTA includes Civil Rights Requirements in all of its contracts; including Non-Discrimination, Equal Employment Opportunity, Age, and Disabilities clauses.

The TCTA includes in its Overall Work Program each year a work element that is specifically focused on consulting and meeting with the traditionally under-represented and under-served segment of the population regarding public transit services. The TCTA strives to have a presence at many well attended public events, such as the annual Health Fair and Senior Expo events, and at various service organization meetings, such as Kiwanis and the Rotary Club. Transit staff also serves on community committees, such as the Commission on Aging and the Senior Network, Social Service Consortia and participates in community strategic planning meetings.

The TCTA consults with the Social Service Transportation Advisory Council (SSTAC) regarding unmet transit needs as well as other transit related issues that may arise from the population that participates in their programs, including, but not limited to, seniors, persons with disabilities, low-income, and homeless.

Vacant positions on the SSTAC are advertised to provide an opportunity for individuals from social service agencies as well as the general community to participate on this important advisory council to the Regional Transportation Planning Agency, the Tuolumne County Transportation Council. The SSTAC is comprised of members representing social services and transit providers, representing older adults, persons with disabilities, and individuals with limited means. The Tuolumne County Transportation Council does not require applicants for their advisory committees to identify their racial/ethnic makeup.

The SSTAC meetings are open to the public. The Tuolumne County Transit Agency, as the recipient, does not select transit-related, non-elected planning boards, advisory councils or committees, or similar committees. Chapter III-9 and Appendix F of the Title VI Circular do not apply to the TCTA.

The Unmet Transit Needs Hearing is widely advertised each year to provide an opportunity for the public to voice their issues and concerns regarding the regional public transit service in Tuolumne County. An opportunity to submit written comments is also provided on the [www.tuolumnecountytransit.com](http://www.tuolumnecountytransit.com) website. A form was created in 2011 prior to the unmet transit needs process in an effort to make it easier for the public to submit comments, which has been used each year since that time. This form is available in the TCTA office, on the website, on transit buses and from SSTAC members.

The Transit Contractor provides ongoing in-service training for transit staff, including managers, bus drivers, dispatchers and maintenance staff.

## **Language Assistance Plan**

### ***Purpose of the Language Assistance Plan***

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. One critical concern addressed by Title VI is the language barrier that Limited English Proficiency (LEP) persons face with respect to accessing information about and using transit service. Transit operators must ensure that this group has adequate access to the agency's programs and activities, including public participation opportunities.

Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," forbids funding recipients from "restricting an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program," or from "utilize[ing] criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respects to individuals of a particular race, color, or national origin."

FTA Circular 4702.1B was developed by the Federal Transit Administration (FTA) and details the administrative and reporting requirements for recipients of FTA financial assistance to comply with Title VI and related executive orders including on LEP.

The United States Department of Transportation (DOT) published guidance that directed its recipients to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP customers. The Tuolumne County Transit Agency language assistance plan (LAP) includes a four factor analysis and implementation plan that complies with the requirements of DOT LEP guidance.

### ***TCTA Plan***

The TCTA will seek out and consider the viewpoints of minority, low-income and Limited English Proficient (LEP) populations in the course of conducting public outreach and involvement activities. During the public outreach TCTA produced flyers that were posted in all buses as well as various locations around Tuolumne County. TCTA also produced social media ads, television/radio commercials, took out ads in the local newspaper, and posted info on the TCTA website. The information that was dispersed included items like board meetings, transit updates, public meeting notices, special events, and holiday hours. The TCTA's public participation strategy will offer early and continuous opportunities for the public to be involved in the identification of social, economic and environmental impacts of proposed transportation decisions.

The TCTA will ensure that individuals have access to its programs, activities and services by developing and carrying out the language plan herein. The TCTA will continually assess the language assistance needs of the population to be served.

The TCTA will use the following four factors to determine what measures must be undertaken to provide reasonable and meaningful access to LEP individuals.

1. Languages likely to be encountered and the number or proportion of LEP persons in the eligible service population likely to be affected by the program, activity or service.
  - a. In Tuolumne County we have 552 individuals ages 5 and up that speak Spanish as their primary language and speak English less than very well. There has been zero issues when interacting with this population. Tuolumne County also has individuals that speak French, German, Russian, other Indo-European languages, Korean, Chinese, Vietnamese, Tagalog, and other Asian and Pacific Island languages. These populations are much smaller and TCTA has had zero issues when interacting with these populations as well.
2. Frequency with which LEP individuals come into contact with TCTA's programs, activities and services.
  - a. It's very rare for TCTA to encounter LEP individuals. The few times we have, our drivers were able to understand the need and took care of the individual.

3. The nature and importance of the program, activity or service provided by TCTA to LEP individuals' lives.
  - a. Given Tuolumne Counties low population of LEP individuals we have not had to make extra materials in alternate languages when conducting transit trainings, or social welfare services. If asked to, we surely would.
4. Resources needed to provide effective language assistance and costs.
  - a. The resources and cost to provide effective language assistance is very low for TCTA. Any printed material, radio ad, or television commercial comes out of our general marketing fund.

2017-2021 American Community Survey 5-Year Estimates		
Subject		
	Estimate	Margin of Error
Population 5 years and over		
Total	52,762	+/-89
Speak only English	48,522	+/-551
Spanish	2,747	+/-400
Speak English very well	2,195	+/-371
Speak English less than very well	552	+/-200
French, Haitian, or Cajun	107	+/-85
Speak English very well	107	+/-85
Speak English less than very well	0	+/-31
German or other West Germanic languages	113	+/-63
Speak English very well	98	+/-58
Speak English less than very well	15	+/-24
Russian, Polish, or other Slavic languages	149	+/-113
Speak English very well	113	+/-96
Speak English less than very well	36	+/-51
Other Indo-European languages	507	+/-230
Speak English very well	443	+/-199
Speak English less than very well	64	+/-63
Korean	92	+/-95
Speak English very well	33	+/-39
Speak English less than very well	59	+/-87
Chinese (incl. Mandarin, Cantonese)	32	+/-31
Speak English very well	29	+/-31
Speak English less than very well	3	+/-8
Vietnamese	21	+/-23
Speak English very well	8	+/-14
Speak English less than very well	13	+/-18
Tagalog (incl. Filipino)	239	+/-122
Speak English very well	100	+/-60

Speak English less than very well	139	+/-83
Other Asian and Pacific Island languages	146	+/-70
Speak English very well	61	+/-48
Speak English less than very well	85	+/-52
Arabic	0	+/-31
Speak English very well	0	+/-31
Speak English less than very well	0	+/-31
Other and unspecified languages	87	+/-89
Speak English very well	87	+/-89
Speak English less than very well	0	+/-31

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates

### **SUMMARY**

The results of the Four Factor Analysis can be summarized with the following points:

- No "true" LEP persons have been served by the program.
- No consumers were underserved or exited the program due to language barriers.
- Surveyed staff reported never receiving LEP phone calls.
- If LEP requests are received in the future, TCTA will assist LEP persons in accessing Tuolumne County Transit information and material in the appropriate format.

## ***Language Assistance Implementation Plan***

### **Identifying LEP Individuals**

As evidenced by the Four Factor Analysis, there have been no LEP individuals referred to the Tuolumne County Transit Agency program. In the 43year history of Tuolumne County Transit, ridership has primarily been the general public, the elderly and persons with disabilities. No indication of persons with language barriers has occurred to date.

### **Providing Service**

While the agency does not have a current need for professional translation services, Tuolumne County Transit staff will assist in transit information translation as needed. Tuolumne County maintains a list of staff that can provide Spanish translation. The Transit Contractor provides new drivers with at least 6 hours of training in customer relations, empathy and sensitivity, public relations, and disability awareness. Ongoing training is also provided throughout the year.

**Notice regarding LEP assistance**

The TCTA will post LEP assistance notices on the TCT website and in printed material.

The LEP plan will be updated every three years or more frequently if appropriate.

**Developing a Language Assistance Plan**

As identified in the table above, 2% of the population of Tuolumne County speaks English less than “very well.” Tuolumne County Transit Agency has determined that the most cost effective means of delivering competent and accurate language services is to address the needs of individuals on a case-by-case basis. To date Tuolumne County Transit has received no request for language assistance.

**Staff Training**

TCTA does not have a designated trainer for Title VI. Staff has attended webinars and sought out assistance from Title VI Program leaders.

**Monitoring**

Tuolumne County Transit Agency will update the LEP plan every three years as required by the Title VI Program.

Monitoring will include:

- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to the need for additional translation services.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Maintain a Title VI/LEP complaint log.
- Evaluate TCTA’s response to Title VI/LEP complaints
- Determine whether TCTA fully complies with Executive Order 13166

Tuolumne County Transit Agency does not have any non-elected committees or councils

**Safe Harbor Provision**

The Federal Transit Authority Circular 4702.1B states:

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

*Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.*

*These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding the determination shall be provided to FTA in the Title VI Program."*

## **Title VI Equity Analysis**

DETERMINATION OF SITE OR LOCATION OF FACILITIES. Title 49 CFR Section 21.9(b)(3) states, "In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part." Title 49 CFR part 21, Appendix C, Section (3)(iv) .

The Transit Center land acquisition was based on its central location and access to community development including large grocery outlets, building supply stores, the County's only hospital, schools, senior housing development, restaurants and a myriad of other destinations within the community. The land acquisition was for bare land and in no way contributed to the displacement of any businesses or residences.

## **Performance Standards**

## System Wide Service Standards

Tuolumne County Transit operates five fixed routes, generally between the hours of 6:00a.m and 8:30p.m, Monday through Friday. Tuolumne County Transit provides coordinated transfers with Calaveras Connect at Columbia College.

### Service Standards

*Vehicle Load Standards* – The average of all loads during peak operating period should not exceed 1.25 passengers per seat.

*Vehicle Headway Standards* – Headways vary within each route schedule as shown in the table below.

Route		Daily Round Trips	Headways	Span of Service
1	Sonora Loop	13	1 Hour	6:40 a.m. – 7:21 p.m.
2	Sierra Village to Sonora	3	3 Hours	6:25 a.m. – 6:45 p.m.
3	Groveland Columbia Connect	1	(X)	6:30 a.m. – 5:15 p.m.

*On-time Performance Standards:* It is the goal of Tuolumne County Transit that buses depart no more than 5 minutes late from any scheduled stop and never leave any point prior to the scheduled departure time. The Transit Contract states that the Contractor shall strive for a minimum of 95% of all departures from published time on schedule.

*Service Availability Standards:* The goal of Tuolumne County Transit is to provide transit service to residential areas, health care, shopping, employment, education and activity areas. Local routes are designed to maximize the number of population cluster areas within (1/4) mile of fixed route/Dial-A-Ride service, while still maintaining the minimum 10% farebox recovery.





### Service Policies

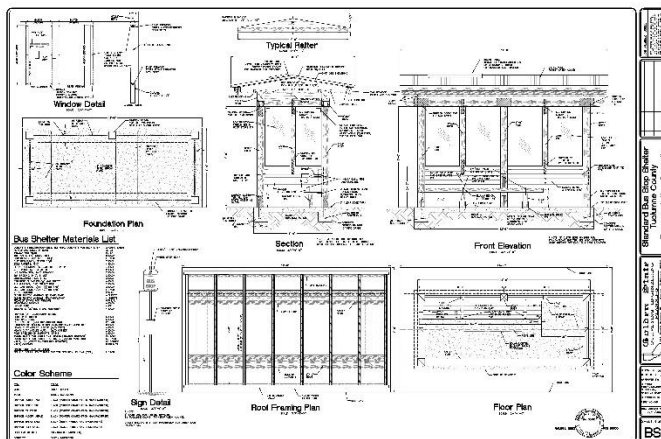
*Vehicle Assignment Policy:* Bus assignments take into account the operating characteristics of the various buses within the Tuolumne County Transit fixed route fleet. Buses are matched to operating characteristics of the route. For example, smaller vehicles are used for less populated routes such as Tuolumne Townsite and larger buses for populated routes such as the Sonora Loop.

*Transit Amenities Target:* System wide, bus stops should be provided at locations serving 5 or more passengers per day, and shelters provided at locations serving 10 or more passengers per day. The installation of surveillance cameras and improved lighting has been completed at various bus stops based on the need.

Systemwide, most Tuolumne County stops have some type of improvement. Typically, this entails a bus stop pole with a sign on the top and rotating kiosk with routes and pickup times listed. In high use areas TCT has installed a bus stop shelter which includes protection from the sun and inclement weather along with a bench. In a few locations there are trash receptacles, but open these present a maintenance issue, and as a result, are only found in 2 locations.

Location with a TCT Shelter- 13  
TCT stops with route info- 33  
TCT with signage only- 6  
Transit Facility- 1

Tuolumne County Transit has developed a bus stop standard diagram which includes pull out requirements, shelter details along with bus stop signage and lighting guidelines. This document is typically shared with development projects which are working their way through the City or County Planning departments.



Currently TCTA is working with the City of Sonoma to construct a major new transit improvement in downtown Sonoma (Stockton Rd). This will include two new shelters (both North/South bound), a crosswalk, lighting, wide sidewalk and landscaping. This stop will replace the current downtown stop location at Courthouse Park.

The long-term goal for Tuolumne County Transit's bus stop program is to have information and amenities at every stop where pickups are made. This will make accessing the system viable for a larger number of users and is consistent with making public transit an attractive and affordable complement to automobile ownership.

Tuolumne County Transit has begun working with a new transit ride reservation and tracking software company called VIA, that will be available to download in the next couple months. This software will be replacing DoubleMap which was good for tracking buses but did not offer the ability to reserve rides. This new software will also alleviate some of the mayhem from calls coming into our dispatch and give us more accurate transit reports.