

#### **CERTIFICATION**

I, Teresa Purrington, City Clerk, do hereby certify under penalty of perjury the foregoing instrument to be a full, true and correct copy of the City of San Luis Obispo Transit Title VI Program for Federal Fiscal Year 2020-22, adopted by the San Luis Obispo City Council on January 21, 2020, now on file in my office.

#### WITNESS MY HAND AND THE SEAL OF THE CITY OF SAN LUIS OBISPO.

DATED: January 22,2020

Teresa Purrington

City Clerk

City of San Luis Obispo

**Department Name:** Public Works **Cost Center:** (5201) Transit **For Agenda of:** January 21, 2020

**Placement:** Consent **Estimated Time:** (N/A)

**FROM:** Shelly Stanwyck, Assistant City Manager - Community Services

Prepared By: Gamaliel Anguiano, Transit Manager

SUBJECT: ADOPTION OF CITY OF SAN LUIS OBISPO TRANSIT'S FEDERAL

FISCAL YEAR 2021-23 TITLE VI PLAN

#### RECOMMENDATION

Adopt the City of San Luis Obispo Transit's Federal Fiscal Year 2021-23 Title VI Plan.

#### **DISCUSSION**

#### **Background**

The US Department of Transportation's (DOT) Federal Transit Administration (FTA) contributes funding to the City's transit program ("SLO Transit"). As a result, SLO Transit is subject to the rules, regulations and policies of the FTA. In compliance with FTA regulations, the SLO Transit, must routinely develop and adopt a Title VI Plan (Attachment A) that addresses discrimination including the prohibition of discriminatory actions by the City, its agents, and contractors.

#### Title VI

Title VI of the Federal Civil Rights Act, 42 U.S.C. § 2000d *et seq.*, prohibits discrimination by recipients of Federal financial assistance on the basis of race, color, and national origin; including the denial of meaningful access for Limited English Proficient (LEP) persons. This prohibition is a requirement for all programs and activities receiving Federal financial assistance. Under the DOT's Title VI regulations, recipients of Federal financial assistance are prohibited from using "criteria or methods of administering its program which have the effect of subjecting individuals to discrimination based on their race, color, or national origin." For example, facially neutral policies or practices that result in discriminatory effects or disparate impacts violate the DOT's Title VI regulations, unless the recipient can show the policies or practices are substantially justified and there is no less discriminatory alternative.

A Title VI plan must be developed and adopted to prevent even unintentional practices that could be interpreted as discriminatory. The City last submitted and received approval of its Title VI plan in 2016. The proposed Title VI plan for Council's consideration is consistent with prior SLO Transit plans and outlines public outreach methods and non-English speaking alternatives for the SLO Transit program. The plan promotes accessible, open-to-the-public, and non-demographic conscious criteria for administrating the SLO Transit program and its services.

#### Tri-Annual Submission of the Title VI Plan

The FTA requires that all funding recipients document their regulatory compliance by submitting a Title VI Plan to its FTA regional civil rights officer once every three years. The Title VI Program must be approved by the direct or primary recipient's board of directors or appropriate governing entity or official(s) (Council in this instance) responsible for policy decisions prior to submission to FTA. FTA will review and either concur with the submitted work or request the recipient provide additional information or revisions.

The City submitted its last Title VI Plan in 2016 (FY 15-16 to 18-19). A revised version thru 2023 is now needed. Staff has reviewed the most recent Federal Circular 4702.1.B regarding Title VI obligations, participated in webinars and coordinated directly with FTA staff before revisiting the SLO Transit program's Title VI plan. The SLO Transit program's Title VI plan remains consistent with previously adopted plans but further clarifies and reaffirms SLO Transit's commitment to Title VI statutes.

#### **Policy Context**

The City Council is the legislative authority which sets the policies under which the City's programs operate. The City Council has the power to adopt ordinances, resolutions, plans, establish policies, approve programs, establish fees, appropriate funds, adopt budgets and approve contracts.

Correspondingly, FTA as the requires that the Title VI program be approved by the direct or primary recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA Council's approval for the Title VI Plan is sought with this Agenda Report.

#### **Public Engagement**

In accordance with Federal requirements, the updated Title VI Plan were brought before the public in a special meeting held on December 5, 2019 and was made available for public review and comment prior to final recommended adoption. All public meetings are held in accordance to the City Public Engagement Manual and SLO Transit's Public Engagement Policies.

#### **CONCURRENCE**

A draft of the revised plan was shared with FTA's Civil Rights Officer for initial feedback and review. The revised plan has received tentative approval.

#### **ENVIRONMENTAL REVIEW**

The California Environmental Quality Act does not apply to the recommended action in this report, because the action does not constitute a "Project" under CEQA Guidelines Sec. 15378.

#### FISCAL IMPACT

Budgeted: No Budget Year:

Funding Identified: N/A

#### **Fiscal Analysis:**

<b>Funding Sources</b>	<b>Current FY Cost</b>	Annualized On-going Cost	Total Project Cost
General Fund	N/A		
State			
Federal			
Fees			
Other:			
Total			

There is no impact on the City's General Fund by submitting the revised Title VI Plan to the Federal Transit Administration. However, Federal funds could be withheld from the Transit Enterprise fund should the City fail in submitting an updated Title VI Plan.

There are no impacts to the City's General fund nor the Transit Fund for developing and adopting a current Title VI plan. The program is a continuation of the Title VI plan currently in effect. The Transit program could however be adversely affected if one is not adopted, as having a Title VI plan is a required for receiving continual federal funding assistance.

All operational needs and requirements stemming from Title VI are considered with each Financial Plan and appropriated budget allocations.

#### **ALTERNATIVES**

- 1. Deny the adoption of the Title VI but this is not recommended as this would cause the Transit program to lose federal financial assistance.
- 2. Alter the Title VI plan but any changes should be considered closely with FTA representatives and could require an extension request for submitting a delayed plan.

#### **Attachments:**

a - SLO Transit Title VI Program - FFY 2020-22



# **Title VI Program**

Federal Fiscal Year (FFY) 2020-22

City of San Luis Obispo Transit (SLO Transit) 919 Palm Street San Luis Obispo, CA 93401 slotransit.org

Date Adopted: January 21, 2020



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### I. Title VI Policy Statement

The City of San Luis Obispo Transit (SLO Transit) is committed to ensuring that no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any of its programs, activities, or services on the basis of race, color, or national origin, as protected by Title VI of the Civil Rights Act of 1964.

Title VI, 42 U.S.C. Section 2000d, of the Civil Rights Act of 1964 states:

"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."

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

The City of San Luis Obispo Transit will ensure that the level and quality of its transportation service is provided without regard to race, color, or national origin.

The City of San Luis Obispo Transit will promote full and fair participation of all affected populations in the transportation decision-making process.

The City of San Luis Obispo Transit will ensure that Limited English Proficient (LEP) individuals have access to the City's transit program, activities, and services.

The City of San Luis Obispo Transit, in compliance with Title 49 CFR Section 21.9 (d), will provide information to the public regarding its obligations under the DOT Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

The City of San Luis Obispo Transit will not condone retaliation against an individual for his/her involvement in asserting his/her rights pursuant to Title VI or because he/she filed a complaint or participated in an investigation under Title VI, and/or this regulation.

#### **Applicability**

This policy is applicable to all City of San Luis Obispo employees, members of the public, and all contractors hired by the City of San Luis Obispo.



As of July 1, 2016, the City of San Luis Obispo Transit has an established contract with First Transit, Inc. for operations and maintenance of the City of San Luis Obispo fixed-route public transit system (SLO Transit). The contractor(s), by extension, will also assist and comply with the adopted Title VI policy.

Failure of a City of San Luis Obispo Transit employee to follow this policy and procedure may subject such employee to disciplinary action up to and including employment termination.

### **II. General Requirements and Guidelines**

The City of San Luis Obispo Transit, in ensuring that no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any of its programs, activities, or services on the basis of race, color, or national origin, will not:

Provide any service, financial aid, or benefit that is different from that provided to others;

Subject an individual to segregation or separate treatment;

Restrict an individual in the enjoyment of any advantage or privilege enjoyed by others;

Deny any individual service, financial aid, or benefits under any of the City's programs, services, or activities;

Treat individuals differently in terms of whether they satisfy admission or eligibility requirements;

Deny an individual the opportunity to participate as a member of a planning or advisory body.

The City of San Luis Obispo Transit shall evaluate systemwide service and fare changes at the planning and programming stages to determine whether these changes have a discriminatory impact on low-income and Limited English Proficient (LEP) individuals. This applies to major service changes that affect 15 percent or more of systemwide service miles or hours.

The City of San Luis Obispo Transit schedules public meetings per the City of San Luis Obispo Major Service Reduction and Fare Increase Policy.

The City of San Luis Obispo Transit will keep the public informed of protections against discrimination afforded to them by Title VI and the City's obligations under Title VI by posting a Title VI Notice to Public (Appendix A) on the City website at slotransit.org, in transit vehicles, and in public areas of the agency's administrative office. The Title VI Complaint Form (Appendix D) will



also both be posted on the City website at slotransit.org and is available at the City of San Luis Obispo Public Works Department at 919 Palm Street in San Luis Obispo.

The City of San Luis Obispo Transit will provide information, upon request from FTA, in order to investigate complaints of discrimination or to resolve concerns about possible Title VI noncompliance.

The City of San Luis Obispo Transit Title VI Program has been prepared in accordance with FTA Circular 4702.1B, dated October 1, 2012. The City of San Luis Obispo Transit will submit its Title VI Program to the FTA Regional Civil Rights Officer every three years to ensure compliance with Title VI Requirements.

#### III. Subcontractors and Vendors

All subcontractors and vendors who receive payments from the City of San Luis Obispo Transit where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended. Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

#### IV. Complaint Procedures and Appeals

#### How to File a Title VI Complaint with the City of San Luis Obispo Transit

Any person who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, or national origin, may file a signed, written complaint up to one hundred eighty (180) days from the date of the alleged discrimination by contacting the Transit Manager (Title VI Coordinator) by phone, email, or in writing:

City of San Luis Obispo
Transit Manager (Title VI Coordinator)
Public Works Department
919 Palm Street
San Luis Obispo, CA 93401
(805) 781-7121
slotransit@slocity.org





The Title VI Complaint Form (Appendix D) may be used to file a Title VI Complaint with the City of San Luis Obispo Transit. The complaint form can be obtained by downloading an electronic form from the City website at slotransit.org or by calling the Title VI Coordinator at (805) 781-7121. The complaint form will be made available in an accessible format upon request.

The City of San Luis Obispo Transit encourages all complainants to submit complaint forms by certified mail, return receipt requested, through the U.S. Postal Service.

#### What happens to the complaint after it is submitted?

All complaints alleging discrimination on the basis of race, color, or national origin will be directly addressed by the Title VI Coordinator. The City of San Luis Obispo Transit shall provide appropriate assistance to complainants, including those persons with disabilities or limited ability to speak English.

A letter acknowledging receipt of complaint will be mailed within thirty (30) working days of receipt of complaint (Appendix E). Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

#### **Procedures for Investigating Complaints**

Upon receipt of the complaint, the Title VI Coordinator will investigate the complaint and make a determination. Formal investigation of the complaint will be confidential, to the extent allowed by law, and will include, but is not limited to, details of the specific incident, frequency and dates of occurrences, and names of any witnesses. The complainant will be notified of the resolution.

#### How will the complainant be notified of the outcome of the complaint?

The City of San Luis Obispo Transit will send a final written response letter to the complainant within sixty (60) working days of receipt of complaint (Appendix F or G). In the letter notifying complainant that the complaint is not substantiated (Appendix G), the complainant is also advised of his or her right to 1) appeal within seven (7) calendar days of receipt of the final written decision from the City of San Luis Obispo Transit, and/or 2) file a complaint externally with the U.S. Department of Transportation (DOT) and/or the Federal Transit Administration (FTA).



#### **Appeals Process**

If the complainant is not satisfied with the resolution, an appeal process is available. An appeal request for review of a determination of unlawful denial of access or accommodation to the public transportation must be filed, in writing, within seven (7) working days of receipt of the final written decision from the City of San Luis Obispo Transit. The written appeal must include the customer's name, address, and telephone number. A statement of reason(s) why the complainant believes the denial of the complaint was inappropriate is recommended.

The City of San Luis Obispo Public Works Director will set a mutually agreed-upon time and place for the review process with the complainant and/or his/her representatives within thirty (30) working days of the appeals request. The complainant may submit documents or other information to be included with the record and considered in the review process. A record of the review will be kept, as determined by the City of San Luis Obispo Public Works Director. Anyone needing reasonable accommodations may contact the City at (805) 781-7121 for assistance.

#### Filing a Title VI Complaint with the FTA Office of Civil Rights

Individuals or organizations can also file a complaint directly with the Federal Transit Administration (FTA) Office of Civil Rights. A complaint must be filed no later than one hundred eighty (180) calendar days after the date of the alleged discrimination, unless the time for filing is extended by FTA. Completed and signed Title VI Complaint forms should be sent to:

#### **Federal Transit Administration Office of Civil Rights**

Attention: Title VI Program Coordinator East Building, 5<sup>th</sup> Floor – TCR 1200 New Jersey Ave., SE Washington, DC 20590

Phone: 1-866-377-8642

The FTA Title VI Complaint Form can be found at the following link: <a href="https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/fta-civil-rights-complaint-form">https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/fta-civil-rights-complaint-form</a>

Once a complaint has been accepted by FTA for investigation, FTA will go through an investigative process and make determinations based on findings. Investigative process and determination by FTA should be completed within one hundred eighty (180) calendar days of the date the FTA accepts the complaint for investigation. The City of San Luis Obispo Transit will cooperate with FTA, when required, during the investigative process and will take appropriate actions when a violation is determined. Upon completion of the investigation, FTA Office of Civil Rights will



transmit to the complainant and the grantee a letter of finding and resolution. If either party wishes to appeal the decision, the letter of finding and resolution will provide the opportunity and instructions to do so.

#### V. Investigations, Complaints or Inquiries

The City of San Luis Obispo will maintain a list (a minimum of four years in active status) of any Title VI investigations, complaint, or lawsuits filed which allege the City of San Luis Obispo discriminated against a person or group on the basis of race, color, or national origin.

The list will include, at a minimum:

- The date the investigation, complaint, or lawsuit was filed
- A summary of the allegation(s)
- The status of investigation, complaint, or lawsuit
- Any actions or correction actions taken by the City in response to the investigation, complaint or lawsuit.

The City of San Luis Obispo has had no complaints, investigations, or lawsuits which allege discrimination on the basis of race, color, national origin, or any other form of discrimination since the last Title VI Program submission effective December 1, 2016 through November 30, 2019 or active within the last four years.

#### VI. Record Keeping

The Title VI Coordinator will maintain permanent records, which include, but are not limited to, signed acknowledgements of receipt from the employees indicating the receipt of the City of San Luis Obispo Title VI Plan, copies of Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

#### **VII. Title VI Information Dissemination**

Title VI information shall be publicly displayed in the City of San Luis Obispo Transit Facility at 29 Prado Road, the City of San Luis Obispo Transit Center at 990 Palm Street, and on fixed-route revenue vehicles. The plan information, along with contact information for the City of San Luis Obispo Transit Title VI Coordinator is available on the SLO Transit website at slotransit.org. Additional information relating to nondiscrimination obligation can be obtained from the City of San Luis Obispo Transit Title VI Coordinator.



Title VI information shall be disseminated to SLO Transit employees annually via the Employee Education form (Appendix B). This form reminds employees of the SLO Transit policy statement and their Title VI responsibilities in their daily work and duties. During New Employee Orientation, new employees shall be informed of the provisions of Title VI and City of San Luis Obispo Transit expectations to perform their duties accordingly.

All employees shall be provided a copy of the Title VI Program and are required to sign the Acknowledgement of Receipt (Appendix C).

Title VI information shall also be made available in non-English languages, consistent with the City of San Luis Obispo Transit Limited English Proficiency (LEP) plan.

#### List of Public Locations Title VI Notice Is Posted

The City of San Luis Obispo Transit Title VI notice to the public is currently posted at the following locations:

- City of San Luis Obispo Transit Facility, 29 Prado Road
- City of San Luis Obispo Transit Center, 990 Palm Street
- California Polytechnic State University, 1 Grand Avenue
- San Luis Obispo Amtrak Station, 1011 Railroad Avenue
- SLO Promenade, 313 Madonna Road
- Fixed-route revenue vehicles (Appendix A)
- SLO Transit User Guide (Appendix A)
- SLO Transit website, slotransit.org (Appendix A)

#### VIII. Public Participation Plan

Per the City of San Luis Obispo Major Service Reduction and Fare Increase Policy, the City of San Luis Obispo shall maintain an open and participative process including the consideration of public comment before any major service reduction or fare increase.

#### I. Purpose

49 U.S.C. section 5307(d)(1)(I) provides that urban grant recipients shall have:

"a locally developed process to solicit and consider public comment before raising a fare or carrying out a major reduction of transportation."



The City of San Luis Obispo Transit is a recipient of Federal Transit funding and therefore must establish an acceptable public meeting procedure with respect to fare increase and major service reductions as required by Federal law.

#### Public Meeting and Comment Period for Major Service Reduction and Fare Increase

#### II. Definitions

- a. A major service reduction is defined as a reduction in service of 15 percent of daily revenue miles or hours or a number of indefinite service reductions in any given fiscal year that add up to more than 15 percent of daily revenue miles or hours.
- b. A fare increase is defined as any increase to a fare per price per unit of service.
- c. An emergency service change is defined as a service change that is to be in effect for fewer than thirty (30) days and the service change does not meet the criteria as a major service reduction. Examples include but are not limited to those due to power failure, severe weather, major construction, reconstruction, and improvement projects.

A public comment period shall be held at least forty-five (45) calendar days prior to implementation of a major service change or fare increase.

#### **Public Noticing Procedure**

#### III. Procedure

- a. If a major service reduction or fare increase is determined to be necessary by the City of San Luis Obispo transit staff, a recommendation and supporting materials will be submitted to the City of San Luis Obispo City Council for consideration.
- b. If City Council determines that a major service reduction or fare increase to be necessary based on staff recommendation and supporting documentation, staff will schedule and advertise no less than two public meetings to be conducted in accordance with the City of San Luis Obispo Public Engagement Manual. One meeting will be held during typical workday hours (before 5 p.m.) and the other after workday hours (after 5 p.m.). At a minimum, public notices for public meetings will be posted or electronically provided to the following, in both English and Spanish:



- City Hall, 990 Palm Street
- Downtown Transit Center, 990 Palm Street
- City/County Public Library, 995 Palm Street
- On-board fixed-route transit vehicles
- Government Access Channel 20
- City of San Luis Obispo Transit (SLO Transit) website
- City of San Luis Obispo website
- Social Media
- Paid and legal notices in local print periodicals
- Press releases

#### **Scheduling Public Meeting Locations and Times**

- a. To the greatest extent possible, public meetings will be held in a convenient, accessible and diverse location. All facilities used for a public meeting will be accessible to persons with disabilities.
  - The public meeting location will be along bus routes whenever possible;
  - The public meeting will be held under the supervision of the City of San Luis Obispo Transit Manager;
  - The public comments will be recorded and filed;
  - The public meeting may be held at a regular Mass Transportation Committee meeting;
  - Spanish speaking assistance availability
- a. Following the public meeting, staff will give a recommendation for City Council consideration.
- b. If City Council adopts a plan for Major Service Reduction or Fare Increase, the City of San Luis Obispo Transit Manager shall be authorized and directed to implement the action according to the approved transit schedule. The schedule shall provide a minimum of 45 calendar days public notice of the service or fare changes prior to implementation.

#### IV. Exemptions

The following criteria establish certain instances which are exempt from the requirement to solicit public comment:

- Annual seasonal variations (i.e. academic service and summer service)
- Special events (i.e. marathon, triathlon, etc.)
- Changes imposed and under control by private organizations (i.e. Cal Poly)



- Emergency service change
- Experimental service changes for a period of 180 days or less, unless the changes extend beyond 180 days and meet the criteria
- Any fare, ticket or pass rate changes that do not result in increased fares per unit of service
- Increases in service
- Decreases in fares

#### **Procedures for Conducting Public Meetings**

Public meetings will begin with a welcome and introduction of staff present. The meeting purpose and proposed action will be explained and clarified for attendees. When the explanation of proposed actions is completed, the public will be invited to offer their comments. All persons wishing to comment will have the opportunity to do so. This public comment period will precede the close of the workshop.

#### **Documentation of Public Meetings**

Records of City of San Luis Obispo Transit public meetings on major service reduction or fare increase will be maintained on file for ten (10) years per the City of San Luis Obispo Records Retention Policy and Schedule.

#### **Addressing Public Comments Received**

Public comments received either in writing or verbally during a public meeting or public comment period will be addressed by the City of San Luis Obispo Transit prior to the established date for City Council decision regarding proposed major service reduction or fare increase. Public comments will be entered into the public record of the comment process. Staff will evaluate and analyze all relevant comments received to determine whether they are reasonable to meet.

#### Outreach to Engage Minority and Limited English Proficient (LEP) Populations

The City of San Luis Obispo Transit will continue assessing the language needs of citizens in its service area per the Language Assistance Plan (LAP), which is described in greater detail in the Limited English Proficiency (LEP) Plan section of this Title VI Program. To the greatest extent possible, to elicit public participation from minority and LEP populations, the City will engage in the following outreach activities:



- Public outreach may include attending already existing community meetings and gatherings in order to invite participation from LEP populations who may not attend hosted public events.
- The City of San Luis Obispo Transit will ensure that non-English language interpretation will be available at any public meeting and community event, as deemed necessary.
- Public meeting notices will be displayed in both English and Spanish, as deemed necessary.
- Event information on the City of San Luis Obispo Transit website will be posted in English and Spanish, as deemed necessary.
- The City of San Luis Obispo Transit will distribute event information to community groups and agencies that work with LEP populations, if such contacts exist.
- The City of San Luis Obispo Transit will contract to provide language assistance, or interpretations services, for customers and callers that are non-English speaking, as deemed necessary.

#### **Mass Transportation Committee (MTC)**

The City of San Luis Obispo Mass Transportation Committee (MTC) Advisory Body holds meetings bi-monthly to review SLO Transit service and performance. The public is welcome to attend these meetings and share in discussion. All meetings are compliant with the Brown Act of California which guarantees the public the right to attend and participate in meetings of local legislative bodies. Agendas and minutes are available on the City of San Luis Obispo website at slocity.org.

The City of San Luis Obispo Mass Transportation Committee (MTC) Advisory Body has nine (9) members:

- Cal Poly designated employee
- Cal Poly student representative designated by Associated Students, Inc. (ASI)
- Senior citizen (62 years of age or older)
- Person from the business community
- Person with technical transportation planning experience
- Disabled person
- Member at-large
- Alternate members (2)



Committee vacancies are listed on the City of San Luis Obispo website at slocity.org, as well as on the SLO Transit website at slotransit.org and SLO Transit social media. The City Clerk's Office and City Council review the submitted applications in fairness and equity, evaluating the necessary qualifications for the vacant position.

Public meetings may be held at regular MTC Advisory Body meetings. Spanish speaking assistance is available.

#### **Membership of Non-Elected Committees and Councils**

The City of San Luis Obispo Transit does not select membership of non-elected committees and councils.

#### Summary of Community Outreach Efforts Made Since Last Title VI Program Submission

The City of San Luis Obispo Transit has made the following community outreach efforts since the last Title VI Program submission, effective December 1, 2016 through November 30, 2019, summarized below:

January 31, 2017	Public Meeting	Notice of public meeting posted (English/Spanish) at
	Fara Analysis	City Hall, Downtown Transit Center, City/County
	Fare Analysis + Title VI Program	Public Library, Government Access Channel 20, City website, SLO Transit website, social media, paid
	(FFY 2017-19)	notices (Tribune, New Times), press releases, and on-
	(111 2017 13)	board fixed route public transit vehicles
		Meeting held in the City/County Library Room, a convenient and accessible location
		Meeting held at 4:30 PM and 5:30 PM and same content was reviewed at both meeting times
		Presentation regarding fare analysis and Title VI Program
		Draft plans available for review on SLO Transit website at slotransit.org, the City of San Luis Obispo
		Clerks Office at 990 Palm Street, and the City of San



		Luis Obispo Public Works Department at 919 Palm Street Solicited public comment for 45 days
April 4, 2017	Public Hearing  Transit Fare +  Advertising Rates Update	Public Hearing for City Council adoption of the transit fare and advertising rate update scheduled more than 45 days prior to implementation  Notice of public hearing posted (English/Spanish) at
		City Hall, Government Access Channel 20, City website, SLO Transit website, social media, paid notice (Tribune, New Times), and on-board fixed route transit vehicles
		Public Hearing held at City Hall Council Chambers, a convenient and accessible location
June 8, 2017	Public Meeting  Proposed DBE Goal	Notice of public meeting posted (English/Spanish) at City Hall, Downtown Transit Center, City/County Public Library, Government Access Channel 20, City website, SLO Transit website, social media, paid notices (Tribune, New Times), press releases, and onboard fixed route public transit vehicles
		Meeting held in the City/County Library Room, a convenient and accessible location
		Meeting held at 4:30 PM and 5:30 PM and same content was reviewed at both meeting times
		Presentation regarding Proposed DBE Goal
		Draft plans available for review on SLO Transit website at slotransit.org, the City of San Luis Obispo Clerks Office at 990 Palm Street, and the City of San Luis Obispo Public Works Department at 919 Palm Street
		Solicited public comment for 45 days



	1	T
December 5, 2019	Public Meeting  Title VI Program	Notice of public meeting posted (English/Spanish) at City Hall, Downtown Transit Center, City/County Public Library, Government Access Channel 20, City
	(FFY 2020-22) + Proposed DBE Goal (FFY 2021-23)	website, SLO Transit website, social media, paid notices (New Times), press releases, and on-board fixed route public transit vehicles
		Meeting held in the City/County Library Room, a convenient and accessible location
		Meeting held at 4:30 PM and 5:30 PM and same content was reviewed at both meeting times
		Presentation regarding Title VI Program and Proposed DBE Goal
		Draft plans available for review on SLO Transit website at slotransit.org, the City of San Luis Obispo Clerks Office at 990 Palm Street, and the City of San Luis Obispo Public Works Department at 919 Palm Street
		Solicited public comment for 45 days

The City of San Luis Obispo Transit held public meetings regarding the Title VI Program (FFY 2017-19 and FFY 2020-22), Proposed DBE Goal (FFY 2018-20 and FFY 2021-23), and fare analysis. Public meetings were conducted in accordance with the City of San Luis Obispo Major Service Reduction and Fare Increase Policy and held under the supervision of the City of San Luis Obispo Transit Manager. Public comments were recorded and filed.

The City of San Luis Obispo Transit submits to the California Department of Transportation (DOT) and Federal Transit Administration (FTA) annually an application for funding. The application requests funding for both capital and operating assistance. Part of the annual application is a public notice, which includes a 30-day public comment period.

Additionally, the City of San Luis Obispo Transit works with the transit agencies and stakeholder organizations in the service area to review and discuss the planning and contribute to the decision-making process. The City of San Luis Obispo Transit from time to time will provide onboard survey handouts to customers for feedback.



# IX. Limited English Proficiency (LEP) Plan

Per the United States Department of Justice (U.S. DOJ) Executive Order 13166, Limited English Proficient (LEP) persons are individuals who do not speak English as their primary language and have a limited ability to read, speak, write, or understand English. The City of San Luis Obispo Transit is required to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of our programs and activities of individuals who are LEP. The City of San Luis Obispo Transit consulted the United States Department of Transportation (U.S. DOT) LEP Guidance and performed a Four Factor Analysis of public engagement to determine the appropriate mix of LEP services to offer.

The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, FTA Circular 4702.1B, dated October 1, 2012, which states that no person shall be subjected to discrimination on the basis of race, color, or national origin.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, the City utilized the U.S. DOT Four Factor Analysis which considers the following factors:

- 1. The number or proportion of LEP persons in the service area eligible to be served or likely to be encountered by the City of San Luis Obispo Transit Program;
- 2. The frequency with which LEP persons come in contact with City of San Luis Obispo Transit programs, activities, or services;
- 3. The nature and importance of programs, activities or services provided by the City of San Luis Obispo Transit to the LEP population; and
- 4. The resources available to City of San Luis Obispo Transit and overall costs of providing LEP assistance.

A summary of the results of the City of San Luis Obispo Transit Four Factor Analysis is in the following section.



#### **Four Factor Analysis**

1. The number or proportion of LEP persons in the service area eligible to be served or likely to be encountered by the City of San Luis Obispo Transit Program;

Data was gathered from the following sources to identify information on persons who do speak languages other than English at home and who speak it less than well or not at all and would be classified as LEP:

- 2010 Census Data
- Census Bureau American Community Survey and Fact Finder Surveys
- Department of Labor LEP Special Tabulation website

A review of the census data on the numbers of LEP persons revealed that in San Luis Obispo, California the highest percentage of total population five (5) years old and over that spoke a language other than English at home were Spanish speakers. The total Spanish speaking population was 14.7% of the total population of 45,119 in San Luis Obispo (see U.S. Census Bureau Data). The number of Spanish speaking LEP individuals that spoke English "not well" or "not at all" in San Luis Obispo was 13.9%.

Pursuant to the Safe Harbor Provision, an agency is obligated to provide translation of vital documents for eligible LEP language groups that constitute either five percent (5%) or 1,000 persons of the population being served. Documents related to fares, transfers, passes, pass sale locations, days of service, and contact information are available in both English and Spanish translations. The City will provide additional information and interpretation when requested.

2. The frequency with which LEP persons come in contact with City of San Luis Obispo Transit programs, activities, or services;

The City of San Luis Obispo Transit serves LEP persons daily via our fixed route transit system that operates 15 peak vehicles from Labor Day to mid-June and reduced service from mid-June to Labor Day. Within the First Transit, Inc. operations and maintenance staff located at 29 Prado Road, there are ten (10) bilingual employees available for Spanish translation, including six (6) drivers, one (1) safety manager, (1) dispatcher, and (2) technicians. Staff translated in person approximately 10 to 15 times a month and over the phone 5 to 10 times a month during the previous 12 months. Within the Public Works Department located at 919 Palm Street, there is one (1) bilingual approved transit employee in addition to four (4) bilingual approved employees available for Spanish translation. No calls or requests for translation were received by City of San Luis Obispo staff during the previous 12 months.



The City of San Luis Obispo Transit will continue to monitor the following key program areas such as:

- Use of bus
- Participation in public meetings
- Customer service interactions
- Ridership surveys
- Operator surveys
- Purchase of passes and tickets through outlets, and the Rideshare website.
- 3. The nature and importance of programs, activities or services provided by the City of San Luis Obispo Transit to the LEP population;

The City of San Luis Obispo is centrally located in California between Los Angeles and San Francisco. The City has an estimated population of 45,119 (2010 Census Bureau estimate). San Luis Obispo is also home to California Polytechnic State University (Cal Poly), a major source of population, employment, and other overall economic and social impacts. SLO Transit, a program operated out of the Department of Public Works, is the City of San Luis Obispo Transit provider and operates fixed route service throughout the City and trolley service downtown. Other regional and paratransit service providers also offer service to the City.

The City of San Luis Obispo Transit has an established contract with First Transit, Inc. for operations and maintenance of the City of San Luis Obispo fixed-route public transit system (SLO Transit) within the City of San Luis Obispo. SLO Transit operates a total of eight (8) regular routes on weekdays, four (4) routes on weekends, as well as a San Luis Drive Tripper (SLT), Laguna Tripper (LT), and Highland Tripper (HT) on academic weekdays, 6 Express on Thursday (September – November), and a Downtown Trolley Thursday year-round, Friday (June – Labor Day), and Saturday (April – October). Four routes operate weekday evenings during the academic year.

4. The resources available to City of San Luis Obispo Transit and overall costs of providing LEP assistance.

SLO Transit currently provides some information in Spanish such as surveys, bus routes and fares, public service announcements and information on the buses. Documents related to fares, transfers, passes, pass sale locations, days of service, and contact information are available in both English and Spanish translation. Within the First Transit, Inc. operations and maintenance staff located at 29 Prado Road, there are ten (10) bilingual employees available for Spanish translation, including six (6) drivers, one (1) safety manager, (1) dispatcher, and (2) technicians. Within the Public Works Department located at 919 Palm, there is one (1) bilingual approved transit



employee in addition to four (4) bilingual approved employees available for Spanish translation. About \$2,500/year could be allocated in FY 2020-22 for additional language services.

#### Language Assistance Plan (LAP)

Based on the Four Factor Analysis, the City of San Luis Obispo Transit developed the Language Assistance Plan (LAP), comprised of the following five areas:

1. Identifying LEP Individuals who need Language Assistance

The City of San Luis Obispo Transit may identify an LEP person who needs language assistance as follows:

- Bilingual approved, Spanish speaking translators are available upon request during normal business hours for in person or phone translation
- Route and schedule information available on fixed-route vehicles in both English and Spanish. Drivers can assist LEP persons boarding the bus by showing them the Spanish translation in the route and schedule materials or contacting bilingual employees within First Transit located at 29 Prado Road or Public Works Department located at 919 Palm Street
- Bilingual assistance will be available at public meetings and community events. By greeting and welcoming attendees upon arrival, staff will be able to determine the need for bilingual assistance
- Bilingual assistance requests, either at meetings or over the phone, will be monitored to determine whether language assistance beyond Spanish is needed at future events

#### 2. Language Assistance Measures

There are numerous language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which the City of San Luis Obispo Transit responds to LEP persons, whether in person, by phone, or in writing.

The City of San Luis Obispo Transit will assist LEP persons who need language assistance as follows:

 Route and schedule information available on fixed-route vehicles in both English and Spanish



- Route and schedule information available in both English and Spanish on the City of San Luis Obispo Transit Website at slotransit.org
- Bilingual approved, Spanish speaking translators are available upon request during normal business hours for in person or phone translation
- The City of San Luis Obispo Title VI Notice (Appendix A) is posted in both English and Spanish, per the List of Public Locations Title VI Notice Is Posted
- The City of San Luis Obispo Title VI Policy, Title VI Complaint Form (Appendix D), and LEP Plan are posted in English and Spanish on the City of San Luis Obispo Transit website at slotransit.org
- Per the Public Participation Plan, the public participation strategy will offer early and continuous opportunities for the public, including LEP persons, to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions
- The City of San Luis Obispo Transit will ensure that non-English language interpretation will be available at any public meeting and community event, as deemed necessary
- The City of San Luis Obispo Transit will contract to provide language assistance, or interpretation services, for customers and callers that are non-English speaking, as deemed necessary
- The City of San Luis Obispo Transit will provide outreach to the Spanish speaking community in San Luis Obispo, which may include attending already existing community meetings and gatherings in order to invite participation from LEP populations who may not attend hosted public events
- Public participation opportunities through means other than written communication, such
  as personal interviews or use of audio or video recording devices to capture oral comments
  will be considered by the City of San Luis Obispo Transit
- Transit surveys to be conducted by the City of San Luis Obispo Transit and available in both English and Spanish
- Radio, television, or newspaper ads on stations and in publications that serve LEP populations to be considered by the City of San Luis Obispo Transit



#### 3. Training Staff

The City of San Luis Obispo Transit will train staff on its roles and responsibilities in providing meaningful access to services for LEP persons:

- The City of San Luis Obispo Transit provides contractor staff with the Employee Annual Education Form (Appendix B) and Acknowledgement of Receipt of Title VI Program (Appendix C) for annual review of Title VI LEP requirements for providing meaningful access to services for LEP persons
- The City of San Luis Obispo Transit has a list of simple phrases for responding to LEP persons, as well as bilingual approved employees to be referenced for additional translation as needed

#### 4. Providing Notice to LEP Persons

The City of San Luis Obispo Transit will provide Notice to LEP persons, both oral and written communications as follows:

- Pursuant to the Safe Harbor Provision, vital documents related to fares, transfers, passes, pass sale locations, days of service, and contact information are available in both English and Spanish translations
- The City of San Luis Obispo Title VI Notice (Appendix A) is posted in both English and Spanish, per the List of Public Locations Title VI Notice Is Posted
- The City of San Luis Obispo Title VI Policy, Title VI Complaint Form (Appendix D), and LEP Plan are posted in English and Spanish on the City of San Luis Obispo Transit website at slotransit.org
- Public meeting notices will be displayed in both English and Spanish, as deemed necessary
- Additional information and interpretation will be provided as needed

#### 5. Monitoring and Updating the LEP Plan

The City of San Luis Obispo Transit will perform the Four Factor Analysis every three years to monitor changes in demographics and identify additional information or activities that might improve non-discriminatory service to LEP persons. The City of San Luis Obispo Transit will



consider whether new documents and services need to be made accessible for LEP persons. The City will then evaluate the projected financial and personnel needed to provide the requested services and assess which of these can be provided cost-effectively.

The City of San Luis Obispo Transit will examine and update the LEP plan as follows:

- Record and report on the number of LEP persons encountered annually
- Determine how the needs of LEP persons have been addressed
- Determine the current LEP population in the service area and 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 of San Luis Obispo Transit financial resources are sufficient to fund language assistance resources needed
- Determine whether the City of San Luis Obispo Transit and its contractor have fully complied with the foals of this LEP Plan
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals

The City of San Luis Obispo Transit will update the LEP Plan as required by the U.S. DOT.

# X. Efforts to Ensure Subrecipient Compliance with Title VI

As a primary recipient of FTA funds, the City of San Luis Obispo Transit is required to provide assistance to subrecipients of federal financial assistance to support subrecipient compliance with Title VI regulations. Primary recipients are also required to monitor subrecipients for compliance with regulations. The City of San Luis Obispo Transit currently does not extend FTA financial assistance to subrecipients.



## XI. Systemwide Service Standards and Policies

Service standards and policies are designed to encourage and include public participation in the decision-making process in order to deter any discrimination and/or exclusion. To review the strategies and procedures set forth by the City of San Luis Obispo Transit, refer to the Public Participation Plan in this document. In accordance with FTA Circular 4702.1B, Chapter IV, the City of San Luis Obispo Transit is required to set service standards for each specific mode of fixed-route transit provided, and at a minimum must include the following indicators:

- a. Vehicle Load
- b. Vehicle Headway
- c. On-Time Performance
- d. Service Availability

The City of San Luis Obispo Transit is also required, at a minimum, to set services policies for the distribution of transit amenities for each mode and vehicle assignment.

The City of San Luis Obispo Transit currently has an active fleet of seventeen (17) buses that are used for the City of San Luis Obispo fixed-route transit service. Only fifteen (15) of these buses are used at peak periods of service. This does not trigger the threshold of additional service standards which transit providers that operate fifty (50) or more fixed-route vehicles in peak service must include as part of their Title VI Program.

The following sections outline the City of San Luis Obispo Transit service standards and policies for its fixed-route services.

#### **Vehicle Load**

Vehicle load is expressed as the ratio of passengers to the total number of seats on a vehicle. Vehicle load varies by route, time of day, and season. The City of San Luis Obispo Transit uses fixed-route fleet of buses interchangeably systemwide based on ridership demand, vehicle availability, and roadway constraints. Roadway constraints and passenger loads limit bus interchangeability on certain routes.

The table below identified the maximum load factor for the City of San Luis Obispo fleet.

Bus Vehicle Type	Seated	Standing	Total	Maximum Load Factor
30-ft 2007 Gillig	25	15	40	1.6
35-ft 2008 Gillig	34	20	54	1.6
40-ft 2008 Gillig	38	25	63	1.6



40-ft 2009 Alexander Dennis Trolley	83	40	123	1.5
28-ft 2011 El Dorado Cutaway	28	10	38	1.3
40-ft 2012 Gillig	38	25	63	1.6
40-ft 2013 Gillig	38	25	63	1.6
40-ft 2017 Gillig BRT	38	25	63	1.6

#### **Vehicle Headway**

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds with more frequent service. Vehicle headways are measured in minutes (e.g. every 15 minutes) and are generally used to determine the level of service provided along a route.

SLO Transit operates a total of eight (8) regular routes on weekdays, four (4) routes on weekends, as well as a San Luis Drive Tripper (SLT), Laguna Tripper (LT), and Highland Tripper (HT) on academic weekdays, 6 Express (6X) on Thursday (September – November), and a Downtown Trolley Thursday year-round, Friday (June – Labor Day), and Saturday (April – October). The following tables identify the average headways for each regular route, provided during different periods of the day.

#### Academic Service

Routes	Morning	Afternoon	Evening
	6:00 AM - 12:00 PM	12:00 PM – 6:00 PM	6:00 PM – 11:00 PM
Route 1A	60 minutes	60 minutes	60 minutes
Route 1B	60 minutes	60 minutes	60 minutes
Route 2A	60 minutes	60 minutes	60 minutes
Route 2B	60 minutes	60 minutes	60 minutes
Route 3A	20 minutes	60 minutes	60 minutes
Route 3B	60 minutes	30 minutes (avg)	60 minutes
Route 4A	45 minutes	45 minutes	45 minutes
Route 4B	45 minutes	45 minutes	45 minutes

#### Summer Service

Routes	Morning	Afternoon	Evening
	6:00 AM - 12:00 PM	12:00 PM – 6:00 PM	6:00 PM – 8:00 PM
Route 1A	60 minutes	60 minutes	60 minutes
Route 1B	60 minutes	60 minutes	none
Route 2A	60 minutes	60 minutes	60 minutes



Route 2B	60 minutes	60 minutes	none
Route 3A	60 minutes	60 minutes	60 minutes
Route 3B	60 minutes	60 minutes	none
Route 4A	45 minutes	45 minutes	45 minutes
Route 4B	45 minutes	45 minutes	none

#### Weekend Service

Routes	Morning	Afternoon	Evening
	8:00 AM - 12:00 PM	12:00 PM – 6:00 PM	6:00 PM – 8:00 PM
Route 1A	60 minutes	60 minutes	60 minutes
Route 2A	60 minutes	60 minutes	60 minutes
Route 3A	60 minutes	60 minutes	60 minutes
Route 4A	45 minutes	45 minutes	45 minutes

#### **On-Time Performance**

On-time performance is a measure of runs completed as scheduled, which is defined by the transit operator. City of San Luis Obispo Transit routes are considered to be "on time" if the bus departs an established timepoint no later than five (5) minutes as published on the route schedule. Buses are not allowed to depart earlier than the scheduled timepoint. To ensure high quality of service, on-time performance standard for the City's fixed-route transit services is set at 95%.

#### **Service Availability**

Service availability is a general measure of the distribution of routes within a transit provider's service area. For the City of San Luis Obispo, transit routes are designed to provide transit access within ¼ mile for 99 percent of residents within the City of San Luis Obispo.

#### **Distribution of Transit Amenities**

Transit amenities refer to the items of comfort, convenience, and safety that are available to the general riding public. For the City of San Luis Obispo Transit, installation of transit amenities along any specific route is based on ridership demand and the number of passenger boardings at stops along these routes. Currently, SLO Transit riders have access to over 165 bus stops. The City of San Luis Obispo Transit is responsible for maintaining bus stops and bus stop amenities.



#### **Vehicle Assignment**

As previously stated, fleet vehicles are not route specific or assigned by service mode. Vehicles with the highest seating capacity are assigned to routes with higher passenger ridership.

#### XII. Determination of Site or Location of Facilities

Title 49 CFR Section 21.9(b)(3), the City of San Luis Obispo Transit is required to conduct a Title VI equity analysis during the planning stage of any facility in order to ensure that the project's location is selected without regard to race, color, or national origin. Since the last Title VI Program submission, the City has not planned or constructed any facilities as defined by the circular. Therefore, the City of San Luis Obispo Transit has not completed a Title VI Equity Analysis. An Equity Analysis will be conducted should the City engage in planning for the construction of any facility requiring analysis.



#### APPENDIX A Title VI Notice to Public

Identified on the City website at slotransit.org, in transit vehicles, and in public areas of the agency's administrative office.

#### **Title VI Notice**

#### **Title VI Policy**

Title VI, 42 U.S.C. Section 2000d, of the Civil Rights Act of 1964 states:

"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."

The City of San Luis Obispo Transit (SLO Transit) respects civil rights and operates its programs and services without regard to race, color or national origin. SLO Transit is committed to complying with Title VI requirements in all of its programs and services.

# Making a Title VI Complaint

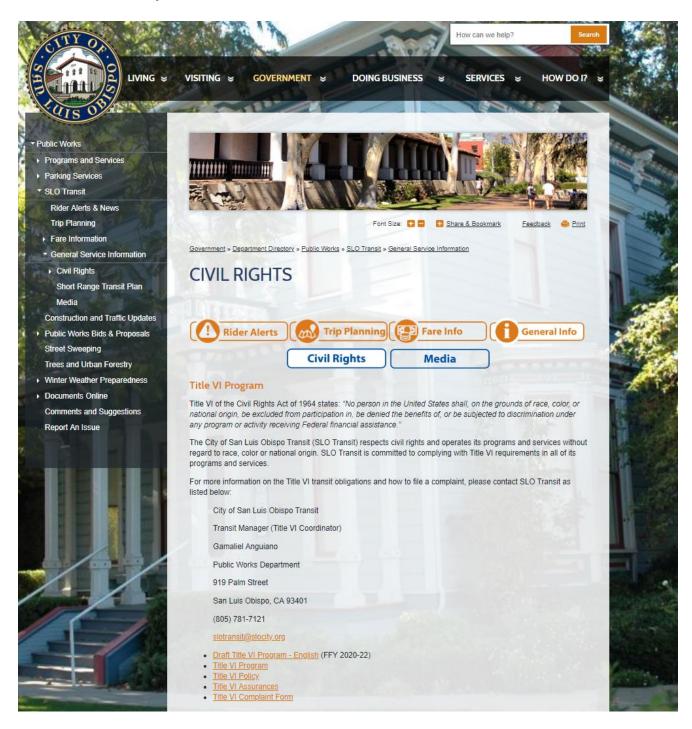
Any person who believes he/she has been subjected to discrimination in the delivery of or access to public transportation services on the basis of race, color, or national origin may file a complaint with SLO Transit. Such complaint must be filed in writing with SLO Transit no later than 180 days after the alleged discrimination. For a complete list of complaint procedures and the Title VI Complaint Form, please visit the City of San Luis Obispo Transit Website at slotransit.org.

For more information on the Title VI transit obligations and how to file a complaint, please contact SLO Transit as listed below:

City of San Luis Obispo
Transit Manager (Title VI Coordinator)
Public Works Department
919 Palm Street
San Luis Obispo, CA 93401
(805) 781-7121
slotransit@slocity.org



#### **Title VI Notice on City Website**





#### **Title VI Notice on Buses**





Title VI of the Civil Rights Act of 1964 (Title VI) prohibits discrimination on the basis of race, color, and national origin in programs that receive federal funding. SLO Transit is committed to complying with the requirements of Title VI in all of its federally funded programs and activities.

Any person who believes that they have been aggrieved by any unlawful discriminatory practice, under Title VI, may file a complaint with the City of San Luis Obispo.

For more information on the Title VI transit obligations and how to file a complaint, contact SLO Transit as listed below:

City of San Luis Obispo Transit Manager (Title VI Coordinator) 919 Palm Street, San Luis Obispo, CA 93401 805.781.7121 slotransit@slocity.org

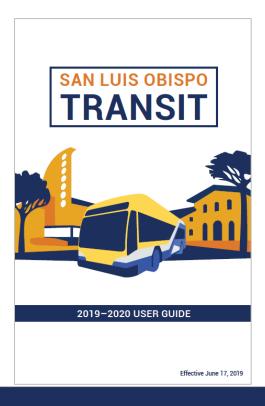






919 Palm Street, San Luis Obispo, CA 93401-3218 805.781.7200 slocity.org

#### **Title VI Notice in User Guide**



#### DAYS OF SERVICE

Routes 1A, 1B, 2A, 2B, 3A, 3B, 4A, 4B, SLT, LT, HT. . . . . . . . . . . Mon-Fri 

SLO Transit operates weekend service on the following holidays:

New Year's Day

Martin Luther King, Jr. Day

- Presidents' Day
- Presidents' Day
   Memorial Day
   Independence Day
   Labor Day
   Thanksgiving Friday
   Christmas Eve
   New Year's Eve

No bus service on Thanksgiving and Christmas Day.

#### **BUS STOPS**

SLO Transit and the Downtown Trolley serve designated bus stops only. Passengers are recommended to arrive at the bus stop before the scheduled arrival time.

#### PASSENGERS WITH DISABILITIES

All buses are mobility device accessible. Door-to-door service is available for qualified persons with disabilities, by calling Runabout at 805-541-2544 or visit slorta.org to learn more.

#### **RULES OF THE ROAD**

- ∴ Riders must vacate seats for seniors and passengers with disabilities.
   ∴ No items are allowed in aisles or wheelchair spaces and carts/ strollers must be folded up.

- No smoking of any kind, including e-cigarettes.
  No eating
  No animals, except for service animals
  No standing in front of the white line and in doorways.

For a complete list, contact customer service at 805-541-2877 or visit: slotransit.org.

#### **BIKE RACKS**

SLO Transit buses are equipped with hike racks. Rack space is first come, first served. Passengers are responsible for both loading and unloading their bike. Always signal to the driver when loading or unloading your bike from the rack. Please return rack to the upright position if no bikes are left after use. No bikes are allowed in the buses. E-bikes up to Sibbs allowable with weight compliance certification issued by Bike SLO County at the Bike Kitchen, 805-547-2055.

The City is not responsible for any losses or damages to bikes.

SLO Transit is committed to complying with Title VI of the Civil Rights Act of 1964 in all programs and services.

#### CONTACT INFORMATION

 
 Schedule Information
 805-541-2877 or slotransit.org

 Lost & Found
 805-541-2877
 | Lost & Found | 805-541-2877 | SLO RTA | 805-541-2228 or slorta.org | 805-541-2248 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-2544 | 805-541-25 Regional Rideshare.... Compliments, Comments, Complaints..... .....slotransit@slocity.org

SLO Transit is online at: google.com/transit, Facebook, Instagram, and Twitter. Call 511 for transit information throughout the state.



# APPENDIX B Employee Annual Education Form

#### Title VI Policy

No person shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

All employees of San Luis Obispo Transit (currently contracted by First Transit, Inc.) are expected to consider, respect, and observe this policy in their daily work and duties. If a citizen approaches you with a question or complaint, direct him or her to the City of San Luis Obispo Transit Manager (Title VI Coordinator).

In all dealings with citizens, use courtesy titles (i.e. Mr., Mrs., Ms., or Miss) to address them without regard to race, color, or national origin.



# APPENDIX C Acknowledgement of Receipt of Title VI Program

I hereby acknowledge the receipt of the San Luis Obispo Transit Title VI Program. I have read the plan and am committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B.

Your signature		
Print your name		
 Date		



# APPENDIX D Title VI Complaint Form

City of San Luis Obispo Transit – SLO Transit

Name:		
Address:		
City:	State:	Zip Code:
Home Telephone No: ( )		
Work Telephone No: ( )		-
Email Address:		_
What do you believe is the reason for your discrin	nination?:	
Race Color National Origin		
Date of Alleged Incident:		_
Explain as clearly as possible what happened and Indicate who was involved. Be sure to include the more space is needed please use the back of the	names and	•
Have you filed this complaint with any other fede or state court?  Yes If yes, No check all that apply:	ral, state, or	local agency; or with any federal



Signature:	Date:			
Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.				
Геlephone Number:				
City: Sta	te:	_ Zip Code:		
Address:				
Name:				
Please provide information about a contact person at tilled:	ne agency/court v	where the complaint was		
Federal agency Federal Court State Ag	ency State (	Court Local Agency		

#### Please mail this form to:

City of San Luis Obispo Transit Manager (Title VI Coordinator) Public Works Department 919 Palm Street San Luis Obispo, CA 93401 (805) 781-7121 slotransit@slocity.org Title VI of the Civil Rights Act of 1964 states: "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

The City of San Luis Obispo Transit (SLO Transit) respects civil rights and operates its programs and services without regard to race, color or national origin. SLO Transit is committed to complying with Tile VI requirements in all of its programs and services.

Any person who believes he/she has been subjected to discrimination in the delivery of or access to public transportation origin, may file a complaint with SLO Transit. Such complaint must be filed in writing with SLO Transit no later than 180 days after the alleged discrimination. A letter acknowledging receipt of complaint will be mailed within 30 days.

For more information on the Title VI transit obligations and how to file a complaint, please contact SLO Transit: City of San Luis Obispo Transit Manager (Title VI Coordinator), Public Works Department, 919 Palm Street, San Luis Obispo, CA 93401



# APPENDIX E Sample Letter Acknowledging Receipt of Complaint

Ms. Jo Doe
1234 Main St.
San Luis Obispo, California 93401

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against San Luis Obispo Transit alleging

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning \_\_\_\_\_\_, or write to me at this address.

Sincerely,

Title VI Coordinator
City of San Luis Obispo
Transit Manager
Public Works Department
919 Palm Street
San Luis Obispo, CA 93401
(805) 781-7121
slotransit@slocity.org



# APPENDIX F Sample Letter Notifying Complainant that the Complaint Is Substantiated

Today's Date

Ms. Jo Doe
1234 Main St.
San Luis Obispo, California 93401

Dear Ms. Doe:

The matter referenced in your letter of \_\_\_\_\_\_\_ (date) against San Luis Obispo Transit (SLO Transit) alleging Title VI violation has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. (If a hearing is requested, the following sentence may be appropriate.) You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

City of San Luis Obispo
Transit Manager (Title VI Coordinator)
Public Works Department
919 Palm Street
San Luis Obispo, CA 93401
(805) 781-7121
slotransit@slocity.org



# APPENDIX G Sample Letter Notifying Complainant that the Complaint Is Not Substantiated

Today's Date

Ms. Jo Doe 1234 Main St. San Luis Obispo, California 93401

Dear Ms. Doe:	
The matter referenced in your complaint of Transit (SLO Transit) alleging	(date) against San Luis Obispo has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964, had in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving federal financial assistance.

San Luis Obispo Transit has analyzed the materials and facts pertaining to your case for evidence of the City's failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated. I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files.

You have the right to 1) appeal within seven calendar days of receipt of this final written decision from San Luis Obispo Transit, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration at Federal Transit Administration Office of Civil Rights Attention: Title VI Program Coordinator East Building, 5th Floor - TCR 1200 New Jersey Ave., SE Washington, DC 20590

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

City of San Luis Obispo
Transit Manager (Title VI Coordinator)
Public Works Department
919 Palm Street
San Luis Obispo, CA 93401
(805) 781-7121
slotransit@slocity.org