



City of Escalon (eTrans) Title VI Program Fiscal Years 2020-2021 to 2022-2023



City of Escalon
2060 McHenry Avenue
Escalon, CA 95320
June 2020



CITY OF ESCALON
TITLE VI PROGRAM
FISCAL YEARS 2021 to 2023
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Reference: FTA Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration (FTA) Recipients (October 1, 2012).

INTRODUCTION

The purpose of this Title VI Program is to establish guidelines to effectively monitor and ensure that the City of Escalon transit services, commonly known to the public as eTrans are in compliance with FTA Title VI requirements.

Title VI states that “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 FTA is required to ensure that federally-supported transit services and related benefits are provided consistent with Title VI. The Title VI Report requires an update every three years.

The City of Escalon (eTrans) will ensure that its programs, policies, and activities comply with Department of Transportation’s (DOT) Title VI Regulations (49 CFR Part 21) and with Limited English Proficient (LEP) Persons requirements (70 FR 74087, December 14, 2005). The City of Escalon is committed to creating and maintaining a public transportation system that is free of all forms of discrimination. The City of Escalon will take necessary preventive corrective and disciplinary actions to stem behavior that violates this policy or the rights and privileges it is designed to protect. FTA requires recipients to document compliance with DOT Title VI regulations by submitting a Title VI Program once every three years.

City of Escalon - eTrans Title VI Policy Statement

*The City of Escalon is committed to ensuring that
no person is excluded from participation in or denied the benefits
Of its services on the basis of race, color, or national origin, as provided
by Title VI of the Civil Rights Act of 1964, as amended.*



ENVIRONMENTAL JUSTICE REQUIREMENTS

City of Escalon shall integrate an environmental justice analysis into its National Environmental Protection Act (NEPA) documentation of construction projects. City of Escalon is not required to conduct environmental justice analyses of projects where NEPA documentation is not required. City of Escalon will consider preparing an environmental assessment (EA) or environmental impact statement (EIS) to integrate into its documents the following components when performing construction projects:

- A description of the low-income and minority population within the study area affected by the project, and a discussion of the method used to identify this
- population (e.g., analysis of Census data, direct observation, or a public involvement process);
- A discussion of all adverse effects of the project both during and after construction that would affect the identified minority and low-income populations;
- A discussion of all positive effects of the project that would affect the identified minority and low-income populations, such as improvements in transit service, mobility, or accessibility;
- A description of all mitigation and environmental enhancement actions incorporated into the project to address the adverse effects, including, but not limited to, any special features of the relocation program that go beyond the requirements of the Uniform Relocation Act and address adverse community effects such as separation or cohesion issues; and the replacement of the community resources destroyed by the project;
- A discussion of the remaining effects, if any, and why further mitigation is not proposed; and
- For projects that traverse predominantly minority and low-income and predominantly non-minority and non-low-income areas, a comparison of mitigation and environmental enhancement actions that affect predominantly low-income and minority areas with mitigation implemented in predominantly non-minority or non-low-income areas.

In addition, the State of California through the California Environmental Quality Act (CEQA), is a statute that requires state and local agencies to identify the significant environmental impacts of their actions and to avoid or mitigate those impacts, if feasible. When NEPA documents are prepared, the City will also comply with CEQA regulations.



eTrans SERVICE AREA MAP



The City of Escalon's objectives are to:

- Ensure that the level and quality of transportation service is provided without regard to race, color or national origin.
- Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations.
- Promote the full and fair participation of all affected populations in transportation decision making.
- Prevent the denial, reduction or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- Ensure meaningful access to programs and activities by persons with limited English proficiency (LEP).



TITLE VI REQUIREMENTS

1. **Requirement to Notify Beneficiaries of Protection under Title VI.** In order to comply with 49 CFR, Section 21.9(d), the City of Escalon shall provide information to the public regarding the City of Escalon's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

Title VI Notice to the Public

The City of Escalon informs members of the public of its Title VI protection rights by posting of a Title VI Notice to the Public and providing bilingual complaint procedures, as shown in Exhibits A and B. The Title VI Notice to the Public is posted at several locations, including the Escalon City Hall, on buses, inside eTrans Rider's Guide and on the City's website, www.cityofescalon.org.



**EXHIBIT A
NOTICE TO THE PUBLIC**



City of Escalon Title VI Policy

In compliance with U.S. Department of Transportation Title VI regulations (49 CFR part 21), the City of Escalon operates programs without regard to race, color, and national origin. Contact the City of Escalon Transit at 2060 McHenry Avenue, Escalon, CA 95320, (209) 691-7465, or email: jandoh@cityofescalon.org to request additional information regarding City of Escalon's non-discrimination obligations.

Any person who believes himself or any specific class of persons to be subjected to discrimination prohibited by Title VI may by himself or by a representative file a written complaint with the City of Escalon or with the Federal Transit Administration (FTA) Office of Civil Rights, Attention: Title VI Program Coordinator, East Building -- 5th Floor TCR, 1200 New Jersey Avenue SE, Washington, DC 20590. A complaint must be filed no later than 180 days after the date of the alleged discrimination, unless the time for filing is extended by FTA.



Ciudad de Escalon Política del Título VI

En cumplimiento de regulaciones del Departamento de Transporte del Título VI de EE.UU. (49 CFR parte 21), la ciudad de Escalon opera programas sin distinción de raza, color y origen nacional. Póngase en contacto con el Ayuntamiento de Escalon Tránsito en 2060 McHenry Avenue, Escalon, CA 95320, (209) 691-7465, o por correo electrónico: jandoh@cityofescalon.org para solicitar información adicional con respecto a la ciudad de las obligaciones del Escalon de no discriminación.

Cualquier persona que crea a sí mismo o cualquier clase específica de personas a ser sometidas a una discriminación prohibida por el Título VI podrá, por sí mismo o por un representante archivar una queja por escrito con la ciudad de Escalon o con la Oficina de la Administración Federal de Tránsito (FTA) de los Derechos Civiles, Atención: Programa del Título VI Coordinador, East Building - 5 ° piso TCR, 1200 New Jersey Avenue SE, Washington, DC 20590. Una queja debe ser presentada no más tarde de 180 días después de la fecha de la supuesta discriminación, a menos que el plazo de presentación es extendida por TLC.



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Title VI Notice Online at <http://cityofescalon.org/cms/one.aspx?pagelid=13056687>

[FY 2012-2013 eTrans Annual Report](#)

[FY 2013-2014 eTrans Annual Report](#)

[FY 2014-2015 eTrans Annual Report](#)

Title VI Notice

In compliance with U.S. Department of Transportation Title VI regulations (49 CFR part 21), the City of Escalon operates programs without regard to race, color, and national origin. Contact the City of Escalon Transit Services at 2060 McHenry Avenue, Escalon, CA 95320, (209) 691-7465, or email: transit@cityofescalon.org to request additional information regarding City of Escalon's nondiscrimination obligations or file a complaint. Any person who believes himself or any specific class of persons to be subjected to discrimination prohibited by Title VI may by himself or by a representative file a written complaint with the City of Escalon or with the Federal Transit Administration (FTA) Office of Civil Rights, Attention: Title VI Program Coordinator, East Building – 5th Floor TCR, 1200 New Jersey Avenue SE, Washington, DC 20590 or with the California Department of Transportation, Division of Rail and Mass Transportation, MS-39, Attn: Title VI Complaints, PO BOX 942874, Sacramento, CA 94274-0001. A complaint must be filed no later than 180 days after the date of the alleged discrimination, unless the time for filing is extended by FTA.

[eTrans Title VI Plan](#)

[eTrans Title VI Complaint Form](#)

Reasonable Modification Policy



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2. **Requirement to Post Notice of Title VI.** The City of Escalon is required to post a public notice of the protections against discrimination afforded by Title VI.

City of Escalon Locations Where Title VI Notice is Posted

The following is a list of locations where transit-related bilingual Title VI Public Notices are posted:

- eTrans buses
- eTrans Ride Guide
- City of Escalon website:
<http://cityofescalon.org/cms/one.aspx?pageId=13056687>
- Escalon City Hall: 2060 McHenry Avenue, Escalon, CA 95320.



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3. **Requirement to Develop Title VI Complaint Procedures and Complaint Form.**
The City of Escalon is required to develop procedures for investigating and tracking Title VI complaints filed against the City of Escalon and to make these procedures for filing a complaint available to the general public.



EXHIBIT B
CITY OF ESCALON eTrans TITLE VI COMPLAINT PROCEDURES

Submission of Complaint: Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the City of Escalon (hereinafter referred to as “City”) may file a Title VI complaint by completing and submitting the City of Escalon Title VI Complaint Form.

Any passenger, vendor, supplier, or member of the public who feels that he or she has been subjected to conduct that violates this policy may file a complaint with the Transit Coordinator in which the alleged discriminatory action originated. Complaints may be filed either in writing, setting out the details of the complaint, or by telephone. The Transit Coordinator will follow up with the complainant and determine the appropriate venue for investigation of the complaint.

The complaint shall be in writing and signed by the complainant(s). Written complaints shall include:

- Date of the alleged discrimination.
- Date when the complainant(s) became aware of the alleged act of discrimination; or
- Date that conduct was discontinued or the latest instance of conduct.
- Detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.

The complaint can be sent to the following:

- City of Escalon, Attn: Transit Coordinator, 2060 McHenry Avenue, Escalon, CA 95320, fax to: 209.691.7439 or email to: transit@cityofescalon.org.
- State of California Department of Transportation, Division of Rail and Mass Transportation, PO BOX 942874, MS #39, Sacramento, CA 94274-0001.
- Federal Transit Administration (FTA), Office of Civil Rights, Attn: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave, SE, Washington, DC 20590.

Investigation of Complaints

The City of Escalon investigates complaints received no more than 180 days after the alleged incident. The City will process complaints that are complete. Once the complaint is received, the City 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.



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Any passenger, vendor, supplier, or member of the public who feels that he or she has been subjected to conduct that violates this policy may file a complaint with the Transit Coordinator in which the alleged discriminatory action originated. This may be done either in writing, setting out the details of the complaint, or by telephone. The Transit Coordinator will follow up with the complainant and determine the appropriate venue for investigation of the complaint.

All complaints which allege illegal harassment are serious and shall be investigated immediately. Depending upon the circumstances of the complaint, the investigation will be conducted by the Transit Coordinator, City Manager or private investigator. If, through investigation, the complaint is found to have merit, appropriate disciplinary action, which may include termination, will be taken against the offender. The disciplinary action/termination will be taken pursuant to the collective bargaining unit, if any, applicable to the offender.

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.

Appeals Process

If the complainant wishes to appeal the decision, she/he has 180 days after the date of the letter or the LOF to do so with the following agencies:

- The Federal Transit Administration Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590 if the complainant believes the occurrence of the discriminatory act is in violation of federal laws. Complainants must be filed **within 180 days of the alleged discriminatory act.**
- The Federal Equal Employment Opportunity Commission if the complainant believes the occurrence of the discriminatory act is in violation of federal laws. Complainants are reminded that the complaint to the federal Equal Employment Opportunity Commission must be filed within 180 days of the alleged discriminatory act or 300 days if the charge is also covered by a state or local anti-discrimination law.

In accordance with FTA Circular 4702.1B, Chapter 9, Complaints, such a complaint must be filed within 180 calendar days after the date of the alleged discrimination.



ANEXO B

CIUDAD DE ESCALON eTrans TÍTULO VI PROCEDIMIENTOS DE QUEJA

Presentación de la Queja: Cualquier persona que crea que ha sido discriminada por motivos de raza, color u origen nacional por la Ciudad de Escalon (en lo sucesivo denominada "Ciudad") puede presentar una queja conforme al Título VI completando y enviando el Formulario de Quejas del Título VI de la Ciudad de Escalon.

Cualquier pasajero, vendedor, proveedor o miembro del público que sienta que ha sido víctima de una conducta que viola esta política puede presentar una queja ante el Coordinador de Tránsito en el que se originó la supuesta acción discriminatoria. Las quejas se pueden presentar por escrito, exponiendo los detalles de la queja o por teléfono. El Coordinador de Tránsito hará un seguimiento con el demandante y determinará el lugar apropiado para la investigación de la queja.

La queja debe ser por escrito y firmada por el denunciante (s). Las quejas escritas incluirán:

Fecha de la supuesta discriminación.

- Fecha en que el querellante se dio cuenta del presunto acto de discriminación; o
- Fecha en que se discontinuó la conducta o la última instancia de conducta.
- Descripción detallada de los problemas, incluidos los nombres y los títulos de los puestos de trabajo de las personas consideradas partes en la denuncia.

La queja se puede enviar a lo siguiente:

- City of Escalon, Attn: Transit Coordinador, 2060 McHenry Avenue, Escalon, CA 95320, fax to: 209.691.7439 or email to: transit@cityofescalon.org.
- State of California Department of Transportation, Division of Rail and Mass Transportation, PO BOX 942874, MS #39, Sacramento, CA 94274-0001.
- Federal Transit Administration (FTA), Office of Civil Rights, Attn: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave, SE, Washington, DC 20590.

Investigación de Quejas

La Ciudad de Escalon investiga las quejas recibidas no más de 180 días después del presunto incidente. La Ciudad procesará las quejas que estén completas. Una vez que se reciba la queja, la Ciudad la revisará para determinar si nuestra oficina tiene jurisdicción. El demandante recibirá una carta de acuse de recibo en la que le informará si nuestra oficina investigará la queja.



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Cualquier pasajero, vendedor, proveedor o miembro del público que sienta que ha sido víctima de una conducta que viola esta política puede presentar una queja ante el Coordinador de Tránsito en el que se originó la supuesta acción discriminatoria. Esto puede hacerse por escrito, exponiendo los detalles de la queja, o por teléfono. El Coordinador de Tránsito hará un seguimiento con el demandante y determinará el lugar apropiado para la investigación de la queja.

Todas las quejas que alegan acoso ilegal son serias y se investigarán de inmediato. Dependiendo de las circunstancias de la queja, la investigación será conducida por el Coordinador de Tránsito, el Administrador de la Ciudad o el investigador privado.



EXHIBIT C
CITY OF ESCALON (eTRANS) TITLE VI COMPLAINT FORM

The City of Escalon operates its programs and services without regard to race, color and national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes that she or he has been aggrieved by any unlawful discriminatory practice under Title VI must file a complaint within 180 days of the alleged occurrence to any of the following by mail, in person, fax and/or email as explained at the end of the form.

Section I:			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Electronic Mail Address:			
Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape	
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other	
Section II:			
Are you filing this complaint on your own behalf?		<input type="checkbox"/> Yes*	<input type="checkbox"/> No
<i>*If you answered "yes" to this question, go to Section III.</i>			
If not, please supply the name and relationship of the person for whom you are complaining.			
Please explain why you have filed for a third party:			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		<input type="checkbox"/> Yes	<input type="checkbox"/> No
Section III:			
I believe the discrimination I experienced was based on (check all that apply): <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Disability			
Date of Alleged Discrimination (Month, Day, Year): _____			
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.			



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Section VI:		
Have you previously filed a discrimination complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please provide any reference information regarding your previous complaint. _____ _____		
Section V:		
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"/> Federal Court:_____ <input type="checkbox"/> State Agency:_____		
<input type="checkbox"/> State Court :_____ <input type="checkbox"/> Local Agency:_____		
Please provide information about a contact person at the agency/court where the complaint was filed.		
Name:_____		
Title:_____		
Agency:_____		
Address:_____		
Telephone:_____		
Section VI:		
Name of agency complaint is against:_____		
Name of person complaint is against:_____		
Title:_____		
Location:_____		
Telephone Number (if available):_____		

You may attach any written materials or other information that you think is relevant to your complaint. Your signature and date are required below

Signature

Date



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Mail, fax, email or deliver completed form to:

- City of Escalon, Attn: Transit Coordinator, 2060 McHenry Avenue, Escalon, CA 95320, fax to: 209.691.7439 or email to: transit@cityofescalon.org.
- State of California Department of Transportation, Division of Rail and Mass Transportation, PO BOX 942874, MS #39, Sacramento, CA 94274-0001.
- Federal Transit Administration (FTA), Office of Civil Rights, Attn: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave, SE, Washington, DC 20590.

If any transit related information is needed in an alternative language, contact the City of Escalon Transit Coordinator at 2060 McHenry Avenue, Escalon, CA 95320, fax to: 209.691.7439, telephone to 209.691.7465 or email to: transit@cityofescalon.org.



ANEXO C
CIUDAD DE ESCALON (eTRANS) TÍTULO VI FORMULARIO DE QUEJA

La Ciudad de Escalón opera sus programas y servicios sin distinción de raza, color y origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles de 1964. Cualquier persona que crea que ha sido perjudicada por alguna práctica discriminatoria ilegal bajo el Título VI debe presentar una queja dentro de los 180 días de la supuesta ocurrencia a cualquiera de los siguientes por correo, en persona, fax y / o correo electrónico como se explica al final del formulario.

Sección I:		
Nombre:		
Teléfono (Casa):		
Telephone (Home):	Teléfono (Trabajo):	
Dirección de correo electrónico:		
Requisitos de formato accesible?	<input type="checkbox"/> Impresión grande	<input type="checkbox"/> Cinta de audio
	<input type="checkbox"/> TDD	<input type="checkbox"/> Otro
Sección II:		
¿Está presentando esta queja en su propio nombre?	<input type="checkbox"/> Sí *	<input type="checkbox"/> No
* Si respondió "sí" a esta pregunta, vaya a la Sección III.		
De lo contrario, proporcione el nombre y la relación de la persona por la que se queja.		
Explique por qué ha solicitado un tercero:		
Confirme que ha obtenido el permiso de la parte perjudicada si está presentando una demanda en nombre de un tercero	<input type="checkbox"/> Sí	<input type="checkbox"/> No
Sección III:		
Creo que la discriminación que experimenté se basó en (marque todo lo que corresponda): <input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen nacional <input type="checkbox"/> Discapacidad		
Fecha de presunta discriminación (mes, día, año): _____		
Explique con la mayor claridad posible qué sucedió y por qué cree que fue discriminado. Describe a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona (s) que lo discriminó (si lo conoce), así como los nombres y la información de contacto de los testigos. Si necesita más espacio, utilice la parte de atrás de este formulario. _____		
Sección VI:		
¿Ha presentado anteriormente una queja por discriminación con esta agencia?	<input type="checkbox"/> Sí	<input type="checkbox"/> No



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En caso afirmativo, proporcione cualquier información de referencia con respecto a su queja anterior.

Sección V:

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

☐ Sí ☐ No

En caso afirmativo, marque todo lo que corresponda: ☐ Tribunal Federal:

☐ Tribunal Federal: _____ ☐ Agencia Estatal: _____

☐ Tribunal estatal: _____ ☐ Agencia local: _____

Proporcione información sobre una persona de contacto en la agencia / tribunal donde se presentó la queja.

Nombre:

Título:

Agencia:

Dirección:

Teléfono:

Sección VI:

El nombre de la queja de la agencia está en contra:

La queja del nombre de la persona es contra:

Título:

Ubicación:

Número de teléfono (si está disponible):

Puede adjuntar cualquier material escrito u otra información que considere relevante para su reclamo. Su firma y fecha son requeridas a continuación

Firma

Fecha

Envíe por correo, fax, correo electrónico o entregue el formulario completo a:

- City of Escalon, Attn: Transit Coordinator, 2060 McHenry Avenue, Escalon, CA 95320, fax to: 209.691.7439 or email to: transit@cityofescalon.org.
- State of California Department of Transportation, Division of Rail and Mass Transportation, PO BOX 942874, MS #39, Sacramento, CA 94274-0001.



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

Si se necesita información relacionada con el tránsito en un idioma alternativo, comuníquese con el Coordinador de Tránsito de la Ciudad de Escalon en 2060 McHenry Avenue, Escalon, CA 95320, envíe un fax al: 209.691.7439, llame al 209.691.7465 o envíe un correo electrónico a: transit@cityofescalon.org.



4. **Requirement to Record and Report Transit-Related Title VI Investigations, Complaints, and Lawsuits.** The City of Escalon is required to prepare and maintain a list of investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, and/or national origin in transit-related activities and programs and that pertain to the entity submitting the report, not necessarily the larger agency or department of which the entity is a part.

The City of Escalon has not been involved in any transit-related Title VI investigations, complaints or lawsuits. The City of Escalon's Transit Coordinator will maintain a list of Title VI investigations, complaints, and lawsuits and include a summary and description of actions taken by the City of Escalon, as required by the Title VI regulations. The list will include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegations(s); the status of the investigation; lawsuit, or complaint; and actions taken in response, or final findings related to the investigation, lawsuit, or complaint. The list will be included in the City of Escalon's Title VI submittal every three years.



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5. **Promoting Inclusive Public Participation and Language Assistance Plan.** The City of Escalon is required to develop a Public Participation Plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submission. This plans are shown in Exhibit D respectively.



EXHIBIT D - CITY OF ESCALON (eTRANS) PUBLIC PARTICIPATION PLAN

Introduction

Located in California's Central Valley, Escalon is an attractive city of 7,478 persons (2020 California Department of Finance population estimates) in a productive area of San Joaquin County, which comprises of 2.3 square miles. The city is surrounded on all sides by scenic agricultural land and open spaces.

Escalon continues to foster its goal of maintaining a vibrant and diversified community. The City's mission statement of "Taking pride in our community through quality service" is apparent through the aggressive policies adopted to preserve a family atmosphere and high quality of life.

Escalon boasts a low crime rate, an award-winning school district, quality residential homes and a quaint, 1920's era downtown.

The City of Escalon (City) is geographically located on State Route 120 between the San Francisco Bay Area and the historic Mother Lode leading to Yosemite National Park. The City is 25 minutes from Stockton, Modesto and Manteca; Escalon offers a central location with direct access to all modes of transportation. As part of this transportation planning process, The City desires and requests citizen input on the work, projects, and products proposed and created by the City.

eTrans is provided under contract with City of Modesto through their transit service called Modesto Area Express (MAX). This contractual arrangement has been in place since July 1, 2020. The City of Modesto has subcontracted the service to National Express Transit Corporation of Lisle, Illinois and operates the service on behalf of the City of Modesto. The present services include a local dial-a-ride service within the City limits and a deviated fixed route service known as Route 35 between Escalon Park and Ride Lot and Modesto.

The City recognizes the importance and necessity of the public participation process.

The following groups govern the activities of the City:

The Escalon City Council sets the overall policy for the transit system. There is a total of five City Council members. The City Council meets on the 1st and 3rd Monday of each month at 7:00 pm at Escalon City Hall.



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All meetings of the Escalon City Council are open to the public. Members of the public may request time on the agenda of the Escalon City Council to comment on specific subjects of interest to the City Council Members. A minimum of two weeks advance notice should be given for requested agenda time. Additional subcommittees and working groups may be appointed at any time by Mayor to address specific transportation-related topics or areas of interest to the City.

Goals and Objectives

The public participation process required by 23 CFR 450 should "... provide complete information, timely public notice, full public access to key decisions, and support early and continuing participation of the public in developing plans and Transportation Improvement Programs..."

The City is committed to the availability of timely, complete information; to the notification of and public access to the decision-making process; and to ongoing public participation throughout the transportation planning process including, but not limited to, the development of the Short Range Transit Plan, the Transportation Improvement Program, review of transit services, fares and operating perimeters and Federal Transit Administration civil rights issues such as Title VI, Disadvantage Business Enterprise (DBE), Equal Opportunity Program (EEO), Americans With Disabilities Act (ADA), Unmet Transit Needs Hearing and the Public Participation Process. Through this *Public Participation Process*, the City aims to identify methods for obtaining public input and encouraging public participation in the transportation planning process.

Stakeholders and Public Groups

The City has identified the following groups and individuals as those having potential interest in public input and participation opportunities:

- Neighborhood organizations;
- Homeowner associations;
- Chamber of Commerce and other business groups;
- Groups representing travel modes - transit, bicycle, pedestrian, freight;
- Advocacy groups for the disadvantaged and/or minority groups;
- Media – newspapers, television, radio;
- Governmental agencies;
- Educational Institutions (school districts, community colleges, private schools, State universities;
- Organizations or individuals who have been notified of public hearings for major projects, or organizations and individuals who have submitted written comments relating to public hearings for major projects, service changes and plans. These individuals and



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organizations would remain on the mailing list as long as the major project is under development.

Information Access

All planning and programming information of the City's transit system (eTrans) is available for public review. The information can be viewed at the Escalon City Hall, 2060 McHenry Avenue, Escalon, CA 95320. Additional information is posted online at www.cityofescalon.org.

Outreach Techniques

Information about all the City meetings is added to the existing Public Meeting Calendar that is produced weekly and that is distributed to local newspapers (Escalon Times, Modesto Bee, The Record) as well as local radio stations in Modesto and Escalon, and is placed on the City's website. In addition, the agenda for the meetings is posted in at Escalon City Hall and on the website, www.cityofescalon.org, a minimum of seventy-two (72) hours prior to the meetings.

Meeting information, when needed, is included in the City's newsletter, as appropriate. This newsletter is published quarterly and distributed to transit passengers and all City residents. Regular meetings, as well as special activities related to transit planning, Title VI and project development would be included.

Press releases to area newspapers, television stations, and radio stations is used to notify citizens of upcoming activities of the City.

The City maintains an active participation in the local government access cable channel. Programs describing the activities of the City are included in the programming.

The City's website, www.cityofescalon.org, is be used to provide information about the City's activities including information about the development of the Short Range Transit Plan, the Transportation Improvement Program, Unmet Transit Needs Hearing and Federal Transit Administration civil rights documents such as Title VI and others. The City's representatives are listed along with contact information.

Formal notices for public input meetings are published in the Escalon Times.

The City of Escalon posts transit schedules and rider information on its website in English and Spanish. The City of Escalon also provides easy access to bilingual



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(English and Spanish) administrative staff and bus operators during operating hours to answer questions for eTrans limited English proficiency passengers.

Public Meetings

The City of Escalon reaches out to the community directly through meetings with agency and community staff and their clients, as needed. Information regarding the City of Escalon's eTrans transit services is disseminated at these meetings. Information is also made available at various locations throughout the community, including Escalon City Hall, Escalon Library, Escalon Community Center, Heritage House, on buses and on the City of Escalon's website at www.cityofescalon.org.

The City of Escalon Transit Coordinator participates in monthly meetings with the San Joaquin Council of Governments (SJCOG) Interagency Transit Committee, Social Services Transportation Advisory Committee, Technical Advisory Committee to discuss transit planning activities and coordination. On occasion, the City's Transit Coordinator also participates in committee meetings with StanCOG in Stanislaus County.

When transit issues are discussed, the City of Escalon schedules transit workshops to invite the public to provide feedback on transit related issues and also uses the City Council, whom sets the policy for the transit system, as an opportunity to gather public feedback before enacting on a decision.

The City of Escalon Transit Coordinator also participates in the development of the SJCOG's "Public Involvement Plan" and the San Joaquin County Coordinated Public Transit and Human Services Transportation Plan. The plan was last updated by San Joaquin Regional Transit District (RTD) in 2012. When the plan was developed, a series of meetings were conducted countywide with participants from throughout the County. Recommendations to maximize community involvement are reflected in these plans and adopted by RTD.

General Awareness Surveys

The City of Escalon, from time to time conducts on-board rider and general awareness surveys in conjunction with various service planning related projects. These personal one-on-one surveys allow passengers to convey any concerns or comments they have regarding eTrans transit services.

Bilingual Outreach

eTrans provide Spanish speaking passengers with bilingual information on public transit services. Staff assistance is utilized in outreach programs and offered for programs and



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public meetings. In addition, if any transit related information is needed an alternative language, passengers can contact the City's Transit Coordinator.

Input Mechanisms

The City accepts input and comments from the public through a variety of means:

- a) The City's website at www.cityofescalon.org
- b) By mail to 2060 McHenry Avenue, Escalon, CA 95320.
- c) By emailing to transit@cityofescalon.org.
- d) By faxing a request or letter to 209.691.7439.

Comment forms can also be obtained at www.cityofescalon.org, by calling 209.691.7465 to have one mailed, by emailing a request to transit@cityofescalon.org or by faxing to 209.691.7439.

The public may submit comments to the individual Escalon City Council members or direct to the City Council itself. Comments on the City's transit services, plans, reports, and programs may be made at public input meetings. The City ensures that all public input meeting locations are accessible in accordance with the Americans with Disabilities Act.

Members of the public, or a representative of a group, with expressed comments on a particular topic may make a request to the Mayor an appointment to serve as a citizen representative on an appropriate subcommittee, if one is activated.

Interested members of the public are able to offer input to the committees at a public forum element of each agenda.

The City does consider and respond to all public input received during the planning and program development processes. If significant written or oral comments are received on transit services, FTA civil rights or plans, a summary, analysis, and report on the disposition of the comments is made a part of the conclusion of the public participation process.

Schedule

Notification and announcement of all upcoming public meetings are made approximately 30 days in advance of the scheduled meeting through the methods



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described in the Outreach Techniques section of this plan. Legal notice of a scheduled public input meeting is published in the Escalon Times approximately 7 to 10 days prior to the meeting.

Regularly scheduled public meetings occur on an as needed basis based on specific subject matter such as the development of the Short Range Transit Plan, the Transportation Improvement Program, review of transit services, fares and operating perimeters, Unmet Transit Needs Hearing, Federal Transit Administration civil rights issues such as Title VI, Disadvantage Business Enterprise, Equal Opportunity Program and Americans With Disabilities Act. Other public input meetings are held throughout the year, as necessary.

Updates and revisions to the City's Public Participation Plan require a 10-day public comment period. The City Council will approve this plan following the completion of the public comment period, if revisions are needed after the initial adoption of the plan.

Evaluation

The City will review this Public Participation Plan periodically in order to monitor the effectiveness of the procedures outlined in this document. Following evaluation of the outputs and outcomes of the Public Participation Plan, The City may revise these methods to incorporate new and innovative ways to involve the public in the transportation decision-making process.

Summary of Public Participation Activities

During Fiscal Years 2017-2020, the following is a summary of Title VI policy planning activities that took place:

- Promoted the San Joaquin Council of Governments Unmet Transit Needs process which included consultation and soliciting feedback regarding current and future transit service needs in Escalon. The public outreach process included conducting a survey online and on board transit buses, publishing flyers for distribution to the ridership, posting on the transit buses, issuing a press release to local media outlets (Escalon Times, The Record and Modesto Bee), issuing a formal public notice within the Escalon Times, adding information about the process on www.cityofescalon.org and lastly holding a formal public hearing at the Escalon City Council on November 20, 2017, December 3, 2018, and November 18, 2019.
- Promoted the Title VI Policy and Public Participation Process for a 10-day period and sought feedback from the public. The public outreach process included publishing flyers for distribution to the ridership, posting on the transit buses,



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issuing a formal public notice within the Escalon Times, adding information about the process on www.cityofescalon.org and lastly holding a formal public hearing at the Escalon City Council on June 15, 2020. The draft plan was available for review by the public at Escalon City Hall, 2060 McHenry Avenue, Escalon, CA 95320 and online at www.cityofescalon.org.

- There was a public hearing on June 19, 2019 to eliminate the separate Route 1 fare and associated passes to Modesto and charge local fares on all eTrans services, accept transfers from RTD Van Go! service at no additional cost and reduce the Senior fare to age 60 and allow veterans with identification to ride at the discount rates. No comments were received.
- There was a public hearing on June 15, 2020 to modify the eTrans fare structure to be similar to Modesto Area Express (MAX) fare structure, which will result in a fare increase to all fare categories by 25 to 50 cents, the age of senior would increase from 60 years old to 65 years old and eTrans passes can be traded for MAX passes to be used in Escalon, Modesto and Ceres. No comments were received.
- There have been no changes to routes and services since July 2015.
- On July 7, 2015, to reduce operating costs associated with the Measure K funding received, the overall service was rescheduled to operate three round trips each weekday due to low ridership departing Escalon at 8:12 a.m., 1:12 p.m. and 4:12 p.m. Dial-A-Ride service was slightly increase to compensate for the reduction of service to Modesto. The route was revised to serve the Rite Aid Pharmacy and Paddock Village Mobile Home Estates. Public feedback was sought between March 2015 and April 2015. No comments were received.



6. **Title VI Equity Analysis.** The City of Escalon does not have a transit related facilities in the planning stages and that would soon be under construction using Federal Transit Administration funding. A separate Title VI Equity Analysis would be prepared by a third-party consultant and will be submitted separate cover if applicable. Therefore, this section does not apply.



7. **Requirement to Provide Meaningful Access to LEP Persons.** The City of Escalon must have a language assistance plan for providing language assistance to persons with LEP. Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP. This plan is shown in the Exhibit E.



**EXHIBIT E
CITY OF ESCALON
LIMITED ENGLISH PROFICIENCY (LEP) PLAN**

Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address the City of Escalon's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The Plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, Federal Transit Administration Circular 4702.1A dated May 13, 2007, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

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

Background

The City of Escalon administers eTrans transit services under a contract with the City of Modesto through their Modesto Area Express (MAX) service. The Escalon City Council is the policymaking body for the transit system.

eTrans transit services consist of a deviated fixed route and demand response service. eTrans operates generally Monday through Friday from 8:12 a.m. to 5:12 p.m.

The City of Escalon has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by eTrans. As defined by Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, and how to notify LEP persons that assistance is available. In order to prepare this plan, the City of Escalon undertook the U.S. Department of Transportation four-factor LEP analysis which considers the following factors:



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1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter the eTrans transit activities or services.
2. The frequency with which LEP persons come in contact with eTrans transit activities or services.
3. The nature and importance of programs, activities, or services provided by the eTrans to the LEP population.
4. The interpretation services available to eTrans passengers and overall cost to provide LEP assistance.

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

Meaningful Access: Four-Factor Analysis

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter the City of Escalon's transit activities, or services.

The 2014-2018 American Community Survey of the United States Census reported that Escalon had a population of 7,509. The population density was 3,011.5 people per square mile (1,162.8/km²). The racial makeup of Escalon was 6,643 (81.6%) White, 47 (0.4%) African American, 45 (1.1%) Native American, 86 (1.3%) Asian, 0 (0.3%) Pacific Islander, 333 (11.5%) from other races, and 355 (3.6%) from two or more races. Hispanic or Latino of any race were 1,924 persons (27.0%).

Of its 7,509 total residents, the City is the home of only 432 residents who speak English "less than very well", "not well" and/or "not at all" – this represents only 6 percent of the City's population. This was reported in the American Community Survey of the U.S. Census Bureau (2014-2018). People of Spanish descent are the primary LEP persons likely to be involved with the City programs and transit services. For the City, California place, the American Community Survey of the U.S. Census Bureau (2014-2018) shows that among the area's population, 94 percent speak English as a first language or "very well" as a second language. For groups who speak English "less than very well", "not well" and/or "not at all", 7.3 percent are Hispanic, and 0.3 percent of the City's population is limited English speaking persons of Asian descent.

2. The frequency with which LEP come in contact with eTrans transit services.

eTrans staff reviewed the frequency with which the Transit Coordinator and contractors staff that could have contact with LEP persons. To date, the City of



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Escalon has had no requests for interpreters and no requests for translated transit program documents. Should requests for interpretation come, the City will use Language Line to provide the interpretation. More details available here: <https://www.language.com/>

Bus operators are in regular contact with LEP persons on eTrans transit services of which the majority is Spanish. All transit information is available in alternative languages. City of Escalon staff or its contractor's staff have Spanish proficiency or access to Spanish speaking staff at all times.

3. The nature and importance of programs, activities, or services provided by the eTrans transit services to the LEP population.

Demographic and survey data show that the eTrans transit passengers are primarily Caucasian, with Spanish comprising the next largest group of passengers.

As part of the preparation of the City's Short Range Transit Plan, FY 2009/10-FY2018/19, Publictransit.us administered an on-board passenger survey to collect data on usage of and access to eTrans transit services. According to the survey, the most common age among all the participants in the three surveys was 65 or older. This supports the fact eTrans can be considered a senior transit service as most of its passengers are over the age of 65.

To further assess personal mobility options, each respondent was asked how he or she would have made the surveyed trip had eTrans not been available. The most frequent response was friend or family member (75 percent). An additional 12 percent indicated they would not have made the surveyed trip if the service were not available. These data would indicate that eTrans transit services is very important as a primary means of transportation for its passengers.

4. The resources available to eTrans and overall cost to provide LEP assistance.

City of Escalon Transit Coordinator has access to a variety of services and resources that can help in outreaching and providing LEP assistance at low or no cost. Community and regionally-based resources include:

- Escalon Senior Lunch Program
- San Joaquin and Stanislaus County Social Services Agencies

The above resources will be used on a regular basis or as needed to assist in identifying needs of the City of Escalon LEP population. They will also serve as a means to widely disseminate bilingual transit service information and



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announcements and to notify the LEP population of planned workshops and outreach efforts.

Based on the four-factor analysis, the City of Escalon will develop its LEP Plan as outlined in the following section.

Identification of LEP Population

The City of Escalon has developed several possible ways to assist in identifying LEP populations within the City, including:

1. Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Have a staff person greet participants as they arrive to City sponsored transit events or other community events where eTrans has a presence. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
3. Survey vehicle operators and other front-line staff, such as eTrans bus operators, on their experience concerning any contacts with LEP persons.
4. Network with local social and human services organizations to assist in identifying LEP groups and individuals most in need of LEP assistance and to further facilitate dissemination of information about the eTrans transit services.

Language Assistance Measures

There are plans for several language assistance options available to LEP persons, including both oral and written language services. There are also various ways in which transit staff can respond to LEP persons, whether in person, by telephone, or in writing.

- Provide a bilingual transit representative at community events and public hearings.
- Placement of statements in notices and publications that interpreter services are available for these meetings.
- Survey bus operators, dispatchers, and other front-line staff on their experience concerning any contacts with LEP persons during the previous year.
- Post City of Escalon Title VI Policy and LEP plan on the City's website, www.cityofescalon.org.



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- When an interpreter is needed, for a language other than Spanish, in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers.

Outreach Techniques

When staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population. Interpreters will be available as needed. The City of Escalon currently uses a variety of outreach approaches, as described below.

Public Outreach Activities

The City of Escalon website posts transit information at www.cityofescalon.org. The City provides easy access to bilingual (English and Spanish) administrative staff and bus operators during operating hours to answer questions during their regular shift schedules for those LEP passengers who use the eTrans transit services.

The City of Escalon reaches out to the community directly through meetings with agency and community staff and their clients, as needed. Information regarding the eTrans transit services is disseminated at these meetings, including schedules and appropriate fliers. Transit information also is made available at a variety of locations throughout the community and on eTrans buses.

Public Meetings

The City of Escalon conducts and participates in transit meetings that are open to the general public. The City of Escalon collaborates with the SJCOG, and other agencies regarding public meetings relating to public transit services.

Participation in Community Activities

The City staff uses a number of public outreach techniques cited in the San Joaquin Council of Governments "Public Participation Plan", including the following:

Public Meetings & Workshops

- Offer customized presentations to existing groups and organizations.
- Co-host workshops with community groups, business associations, etc.
- Sponsor a forum or summit with partner agencies, with the media, or other community organizations.
- Encourage opportunities for public input directly to City Council members.



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- When City staff makes community presentations to groups whom they know in advance are limited-English speakers, an interpreter is hired to translate information from the presentation to meeting attendees.
- When passengers communicate with City staff and state a language preference, requested materials are provided in the requested language.

Techniques for Public Meetings/Workshops

- Open Houses.
- Facilitated discussions.
- Question and Answer session with City transit staff and City Council members.
- Customized presentations.
- Vary the time of day for workshops (day/evening).

Visualization Techniques

- Maps.
- Charts, Illustrations, Photographs.
- Web content and interactive games.
- Electronic voting.
- PowerPoint slide shows.

Polls/Surveys

- For major planning studies, such as the Short Range Transit Plan, conduct statistically valid telephone polls in English as well as in Spanish.
- Electronic surveys via web.
- Intercept interviews where people congregate, such as at transit hubs.
- Printed surveys distributed at meetings, transit hubs, on-board transit vehicles etc.

Printed Materials

- User- friendly documents (including use of executive summaries).
- Outside review of written materials to ensure clear, concise language.
- Post cards.
- Maps, charts, photographs, and other visual means of displaying information.

Targeted Mailings/Flyers

- Work with community-based organizations to distribute flyers.
- Distribute "Take-one" flyers to key community organizations.
- Notices that are posted on City transit vehicles are provided in English and Spanish, as drivers most frequently come into contact with Spanish-speaking individuals. The City provides these notices to other limited-English speaking passengers upon request.



Utilize local media

- News releases.
- Opinion pieces/commentaries.
- Purchase display ads.
- Negotiate inserts into local printed media.
- Place speakers on Radio/TV talk shows.
- Public Service Announcements on radio and TV.
- Develop content for public access/cable television programming.
- Civic journalism and non-profit partnerships.

Use of the Internet/Electronic Access to Information

- Web site with updated content.
- Use social media to reach a larger audience.
- Electronic duplication of open house/workshop materials.
- Interactive web with surveys.
- Use the web to provide interaction among participants.
- Access to planning data (such as maps, charts, background on travel models, forecasts, census data, and research reports.
- Provide information in advance of public meeting.

Notify Public via

- Blast e-mails.
- Notice widely disseminated through new partnerships with community-based and interest organizations.
- Newsletters.
- Printed materials.
- Electronic access to information.
- Local media.
- Notices placed on board transit vehicles at transit hubs.

Techniques for Involving Low Income Communities and Communities of Color

- "Take One" flyers on transit vehicles and transit hub.
- Outreach in the community (flea markets, churches, health centers, etc.).
- Include information on meeting notices and how to request translation assistance.
- Robust use of "visualization" techniques, including maps and graphics to illustrate trends, choices being debated, etc.



Techniques for Reporting on Impact of Public Comments

- Direct mail and email to participants from meetings, surveys, etc., to report final outcomes.
- Newsletter articles.
- Updated and interactive web content.

Techniques for Involving Limited-English Proficient Populations

- Personal interviews or use of audio recording devices to obtain oral comments.
- Translated documents and web content on key initiatives.
- On-call translators for meetings.
- Translated news releases and outreach to alternative language media, such as radio, television, newspapers, and social media.
- Include information on meeting notices on how to request translation services.
- Robust use of visualization techniques, including maps and graphics to choices being debated, etc.
- Train staff to be alert to and anticipate the need of low-literacy participants in meetings, workshops, and the like.
- Information/comment tables or booths at community events and public gathering places.
- Comment cards/"take one" cards on board transit vehicles.

LEP Training and Implementation by City Staff

- When new hires start employment, City's transit contractor provides copies to the City of its own policies and procedures regarding Title VI. These materials has been updated to include City's policy on outreach to and communication with limited-English speaking persons.
- As new policies/procedures are developed, or existing policies/procedures are amended, these new documents are distributed to affected employees through various methods, including but not limited to paper distribution, electronic documents, postings in employee break rooms, and scheduled group or individual training sessions.
- Vehicle operators, who are the most direct point of contact for LEP persons, have several methods to respond to an LEP individual. In many instances, LEP individuals are accompanied by a companion who speaks English and can translate for the passenger. In addition, some vehicle operators are bilingual. If vehicle operators are not bilingual, they are instructed to ask for assistance from a bilingual passenger. In the few cases where there is no one on the bus who can offer language assistance, the bus operator contacts a dispatcher. Some of



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eTrans dispatchers speak Spanish, and they are available to assist bus operators in translating for their passengers.

Assurances

The City of Escalon will ensure that no person, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964, will be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination. Further, City of Escalon will notify the public of protections against discrimination afforded them by Title VI regulations and will take preventive corrective and disciplinary action necessary to stem behavior that violates the rights and privileges the regulations are designed to protect.

The City of Escalon will post information on its website and ensure that it reflects current information consistent with the requirements of 49 CFR Section 21.9(d).

Monitoring and Updating the LEP Plan

The City of Escalon will update the LEP as required by U.S. DOT. At a minimum, the plan will be reviewed and updated when data the U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the eTrans transit service area. Updates will include the following:

Documentation of LEP Personal Contacts

- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether the City of Escalon's financial resources are sufficient to fund language assistance resources needed.
- Determine whether the City of Escalon has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the City of Escalon failure to meet the transit needs of LEP individuals.

Availability of Title VI Plans and Procedures

The City of Escalon LEP Plan and the Title VI procedures are included in the City of Escalon's website at www.cityofescalon.org. Any person or agency with internet access will be able to access and download the plan from the City of Escalon's website. Alternatively, any person or agency may request a copy of the plan via telephone, fax,



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mail, or in person. LEP individuals may request copies of the plan in translation which the City of Escalon will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to City of Escalon's Transit Coordinator:

- City of Escalon, Attn: Transit Coordinator, 2060 McHenry Avenue, Escalon, CA 95320, fax to: 209.691.7439, call to: 209.691.7465 or email to: transit@cityofescalon.org.



- 8. Minority Representation on Planning and Advisory Bodies.** The City of Escalon must describe efforts to encourage participation of minorities on committees, board, councils, or other bodies. The City of Escalon must provide a table of transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the City of Escalon City Council, and must indicate the racial breakdown of the membership of such committees or councils.

The City of Escalon does not have any transit advisory committees or non-elected committees. The City of Escalon does have a Planning Commission; however, they do not review transit related issues. The Commission composition is listed below.



EXHIBIT F
CITY OF ESCALON MINORITY REPRESENTATION ON
PLANNING AND ADVISORY BOARDS

Planning Commission
Membership as of June 2020

- Mark Sarkozy, Chair
- Steve Castellanos, Vice Chair
- Kurt Danziger, Commissioner
- Shawn Strohman, Commissioner
- Barbara Willis, Commissioner

Race	Quantity
White	5
African American	0
Asian/Pacific Islander	0
American Indian or Alaskan Native	0
Native Hawaiian or Other Pacific Islander	0
Multi Race	0
Hispanic	0



9. **Requirement to Develop System-Wide Standards and Policies.** FTA requires all fixed-route transit providers to develop quantitative service standards and policies for their fixed-route service. Individual public transportation providers may set standards that best reflect their local environment.

Since the City of Escalon operates fixed route bus service, the exhibit on the next page will discuss the system-wide standards and policies.



EXHIBIT G
CITY OF ESCALON eTrans
SYSTEM-WIDE STANDARDS AND POLICIES

1. Vehicle Load

Measure: Provides service levels to prevent overcrowding and standees.

The City of Escalon system-wide goal is to have an average maximum load factor for local service not to exceed 1.25, as measured by a ratio of total passengers to seats on board the vehicles. This equates to a maximum of approximately five (5) standees on a 21 foot vehicle.

The City works closely with its contractor to ensure passengers are not left behind due to overcrowding or overloads. Overcrowding is particularly monitored on routes monthly. The City provides bus service using 21 foot buses to minimize overcrowding and ensure passengers wait no longer than 60 minutes for the next bus during peak periods.

Buses in City fleet currently used have seating capacities of:

Length	Make	Model	Seats
21 foot	Starcraft	Allstar	16
15 foot	Dodge	Caravan	4
26 foot	Glaval	Titan II	19

2. Vehicle Headway

Measure: Provides adequate service frequency based on the corridor of operation and ridership demand.

The City system-wide goal is to provide service every 60 minutes during the peak and 180 minutes during the off-peak times between Escalon and Modesto, as demand warrants. Services in rural areas of the City is deployed as demand warrants. The vehicle headway standard is designed to ensure that passengers have equitable wait times for transit vehicles. Vehicle headways are measured as the amount of time between the departure of two subsequent buses along the same route or service corridor. The peak period is defined as Monday through Friday between 6:00 a.m. and 9:00 a.m. and 3:00 p.m. to 6:00 p.m.



3. On-time Performance

Measure: Provides accessible and reliable transit services to Escalon

To ensure reliable services, the City aims to have a 90% on-time performance target at major stops and transfer hubs and an 80% on-time performance target at minor timepoint stops for fixed route operations. In addition, the City standard is less than 1% of fixed-route trips missed or removed from the daily schedule. For dial-a-ride services, the standard for on-time performance is at least 90% of all dial-a-ride trips arriving within the thirty-minute (30) pick-up window.

4. Service Availability

Measure: Provides accessible and reliable transit services to Escalon

City goal is to provide transit service to major origins and activity centers within Escalon and in Modesto. This goal includes providing transit within ¼ mile of 70% of all Escalon residents by census block, 70% of major employers and other large trip generators, and 70% of large multifamily housing developments as well as ensuring that 70% and 70% of middle and high schools are within ½ mile and ¼ mile, respectively, of transit service.

Service Policies

1. Distribution of Transit Amenities

The transit amenities policy is designed to provide the framework for the distribution of bus stop amenities equitably throughout the system. When resources allow for improvements at multiple stop locations, the City will prioritize resources based on passenger activity and transfer opportunities. The City will also recognize the amount of observed boarding versus alighting activity when siting amenities such as shelters, benches, and real-time information screens.

In situations where the City has the authority and available resources to site new amenities at multiple bus stops, amenities will be programmed for placement at those stops based on a ranked score. Amenities may include, but are not limited to, shelters, seating, trash receptacles, and transit information displays. Rankings are based on total scores assigned to each candidate stop and are based on weighted factors, including passenger boardings, transfer opportunities, and access to major activity nodes. While the City will use rankings to program the installation of amenities, external factors (e.g., site limitations, regulations of local jurisdictions, etc.)



may dictate that amenities be installed out of order or not at all. Maintenance and replacement of existing amenities will not be subject to ranked scoring.

2. Vehicle Assignment

The vehicle assignment policy is designed to provide the framework for the distribution of buses in an equitable fashion throughout the system. All vehicles used in transit service will be ADA accessible and accommodate at least two wheelchairs and two bicycles. Vehicle size and capacity will be assigned based on demand and passenger load factors.

RESOLUTION NO. 48-20

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ESCALON
ADOPTING THE UPDATED CITY OF ESCALON'S TITLE VI COMPLAINT
PROCEDURES AND LIMITED ENGLISH PROFICIENCY PROGRAM**

WHEREAS, the City of Escalon is a recipient of Federal Transit Administration (FTA) revenues through the State of California and is required to meet federal regulatory requirements for the Title VI, established by 49 C.F.R. part 21.7; and

WHEREAS, the FTA and the California Department of Transportation (Caltrans) requested that the City of Escalon provide a Title VI Complaint Procedures and Limited English Proficiency Program that ensures that no person or group of persons on the basis of race, color, or national origin is subjected to discrimination in the level and quality of transportation services and benefits and that steps are taken to ensure that persons with limited English proficiency are provided these rights; and


WHEREAS, The City developed an updated Title VI Complaint Procedures and Limited English Proficiency Program based on best practices that meet FTA guidelines.

NOW, THEREFORE, BE IT RESOLVED THAT the City Council of the City of Escalon hereby adopts the City of Escalon Title VI Complaint Procedures and Limited English Proficiency Program presented.

BE IT FURTHER RESOLVED that the Transit Coordinator or designee shall be able to file and Title VI Complaint Procedures and Limited English Proficiency Program presented to Caltrans.


PASSED, ADOPTED AND APPROVED this 15th day of June, 2020 by the following roll call vote:

AYES: Councilmembers BELLINGER, MURKEN, LAUGERO, ALVES, and Mayor SWIFT
NOES: NONE
ABSENT: NONE
ABSTAIN: NONE
ATTEST: NONE



ROBERT SWIFT, Mayor

ATTEST:



JAMIE PIRES, Deputy City Clerk