

Redwood Coast Transit Authority's **TITLE VI PROGRAM**

Updated: September 2023

**Update Approved by the RCTA Board of Directors:
October 30, 2023**



**Redwood Coast Transit Authority
140 Williams Drive
Crescent City, CA 95531**

FINAL

This document was prepared by TMTP Consulting LLC on behalf of Redwood Coast Transit Authority. It is approved by the Redwood Coast Transit Authority Board of Directors to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients."

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Title VI Notice to the Public

Redwood Coast Transit Authority

Redwood Coast Transit Authority is committed to ensuring that no person shall be excluded from the equal distribution of its transit services, programs, and resources because of race, color or national origin in accordance with Title VI of the Civil Rights Act of 1964.

- Redwood Coast Transit provides transit services and operates transit programs without regard to race, color, and national origin in full compliance with Title VI.
- Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI while using Redwood Coast Transit services may file a complaint with Redwood Coast Transit Authority. All complaints will be fairly and objectively investigated.
- To file a complaint, you may contact Redwood Coast Transit by phone: (707) 464-6400 or visit Redwood Coast Transit at: 140 Williams Drive, Crescent City, CA.
- For more information about Redwood Coast Transit's Title VI Program and complaint procedure, please contact (707) 464-6400; or visit the website: www.redwoodcoasttransit.org
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Title VI Program Coordinator, FTA Office of Civil Rights, East Building, 5th Floor – TCR, 1200 New Jersey Ave., S.E., Washington, D.C. 20590
- If information is needed in another language, contact (707) 464-6400
- Si necesita información en otro idioma, contacte al (707) 464-6400

List of Locations Where Title VI Notice Is Posted

Redwood Coast Transit's Title VI notice to the public is posted at the following locations:

Location Name	Address	City
Redwood Coast Transit Authority Maintenance and Operations Center	140 Williams Drive	Crescent City, CA
Redwood Coast Transit Buses	Varies, nightly parked at 140 Williams Drive	Crescent City and Del Norte County, CA
Crescent City Cultural Center Transit Hub	1001 Front Street	Crescent City, CA
Redwood Coast Transit website	www.redwoodcoasttransit.org	online

The Title VI notice and program information is also provided on Redwood Coast Transit's website at:

<http://www.redwoodcoasttransit.org>

Title VI Complaint Procedures

Any person who believes she or he has been discriminated against on the basis of race, color or national origin by Redwood Coast Transit may file a Title VI complaint by completing and submitting Redwood Coast Transit's Title VI Complaint Form. Redwood Coast Transit investigates complaints received no more than 180 days after the alleged incident. Redwood Coast Transit will only process complaints that are complete. The following procedures will be followed to investigate formal Title VI complaints:

- Within 10 business days of receiving the complaint Redwood Coast Transit's Title VI Program Administrator Joseph Rye, will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether our office will investigate the complaint.
- The investigation will be conducted and completed within 30 days of the receipt of the formal complaint.
- If more information is needed to resolve the case, Redwood Coast Transit may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the Title VI Administrator and investigator. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, Redwood Coast Transit can administratively close the case.
- The complainant will be notified in writing of the cause to any planned extension to the 30-day rule.
- A case can be administratively closed also if the complainant no longer wishes to pursue their case. Following the investigation, the Title VI Administrator will issue one of two letters to the complainant: 1) a closure letter or 2) 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. A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur.
- If the complainant is unsatisfied with the decision, he/she has 30 days after the date of Redwood Coast Transit's closure letter or the LOF to appeal to Redwood Coast Transit's Board of Directors or its designee. The complainant is entitled to review the denial, to present additional information and arguments, and separation of functions (i.e. a decision by a person not involved with the initial decision to deny eligibility). The complainant is entitled to receive written notification of the decision of the appeal and the reasons for it.
- The complainant may also file a complaint directly with the Federal Transit Administration, as follows: Title VI Program Coordinator, FTA Office of Civil Rights, East Building, 5th Floor - TCR, 1200 New Jersey Ave., S.E., Washington, D.C. 20590

Redwood Coast Transit's Title VI Complaint Form

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

Redwood Coast Transit's Title VI Complaint Form, Page 2

Section IV:		
14. Have you previously filed a Title VI complaint with Redwood Coast Transit?	YES	NO
Section V:		
15. Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? <input type="checkbox"/> YES* <input type="checkbox"/> NO If yes, check all that apply: <input type="checkbox"/> Federal Agency _____ <input type="checkbox"/> State Agency _____ <input type="checkbox"/> Federal Court _____ <input type="checkbox"/> Local Agency _____ <input type="checkbox"/> State Court _____		
16. If you answered "yes" to #15, provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
Title:		
Agency:		
Address:		
Telephone:		Email:

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

Signature and date are required below to complete form:

Signature _____ Date _____

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

Joseph Rye, Title VI Program Administrator
 Redwood Coast Transit Authority
 Title VI Program Administrator
 140 Williams Drive
 Crescent City, CA 95531

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

This requirement is not applicable as Redwood Coast Transit Authority has not been involved in any transit-related Title VI investigations, complaints, or lawsuits.

Redwood Coast Transit Authority's Public Participation Plan

**Updated: August 2023
Approved by RCTA Board of Directors
October 30, 2023**



**Redwood Coast Transit Authority
140 Williams Drive
Crescent City, CA 95531**

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1. Introduction

Purposes of This Plan

As part of its Title VI Program, Redwood Coast Transit Authority places a high priority on its public participation process. This includes enhancing strategies for engaging minority and Limited English Proficient (LEP) individuals. This plan provides guidelines for involving the public in Redwood Coast Transit's transit-related planning efforts to ensure that all groups are represented and their needs considered.

Redwood Coast Transit Authority is committed to ensuring it serves Del Norte County consistently and in the most cost-efficient and appropriate manner within available resources. Through conversation and collaboration with riders, prospective riders, and the larger surrounding community, Redwood Coast Transit will be able to assess the quality of its service, measure potential impacts to the community from Redwood Coast Transit's transit-related initiatives or proposed initiatives, and ensure that it is providing a valuable and accessible service.

2. Public Participation Process

Approach to Public Participation

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

At the beginning of any project, staff will identify which strategies will be appropriate and effective for that given task and develop an approach. For larger projects, those conducted by contractors, part of the RFP requirements and criteria for scoring proposals will include development of that project's public participation process.

Outreach Requirements and Activities

The following activities are intended to serve as guidelines for minimum levels of outreach to ensure that all riders and potential riders in Redwood Coast Transit have equal access and opportunity to participate in transportation planning and decision-making. These also provide strategies for soliciting input and engaging various communities.

Minimum Outreach Requirements

- Notice for public events may include web postings, printed posters, email blasts to agency-level stakeholders, media releases to local papers, or radio announcements if funding allows.
- Any notices will be posted at least two weeks prior to the public event.
- Notices may be posted at Redwood Coast Transit headquarters, on buses and at bus shelters at key activity/community centers and transfer locations.
- Information about public participation opportunities will also be posted on Redwood Coast Transit's website at least two weeks prior to the event.
- Comments will be accepted at public outreach events, via email, by postal mail, and by phone to ensure that all populations are able to participate.

Outreach Methods to Engage Minority and Limited English Proficient Populations

- Redwood Coast Transit will provide written notice in Spanish of the availability of free oral translation of vital documents. This information will be included in all public notices and on the Redwood Coast Transit website.
- Spanish-language notices may be posted on vehicles that have been identified as key routes used by a Limited English Proficiency (LEP) population and at bus shelters that have been identified as key destinations of LEP populations, if such information exists.
- Redwood Coast Transit will distribute event information to community groups and agencies that work with LEP populations, if such contacts exist.
- Redwood Coast Transit contracts with Language Line, a translation service to provide interpretation for LEP riders that call or visit and need language assistance.
- Redwood Coast Transit will ensure that non-English language interpretation will be available at any public meeting or workshop as is appropriate and necessary.
- Redwood Coast Transit will continue cultivating relationships with community agencies that serve LEP populations.
- Event notices will be sent to local LEP language magazine, newspapers, and/or radio stations if such are identified and are within project budgets.
- Public outreach events may include attending community meetings, such as school meetings, farmers markets, faith-based events, and other community activities to invite participation from LEP populations who may not attend RCTA-hosted public events.

Again in 2023, there remain no LEP languages among the Del Norte County population which meet the Safe Harbor threshold based on Census data. Redwood Coast Transit will continue assessing the language needs of residents in its service area through its Language Assistance Plan. At the time that a group with limited English proficiency reaches significant mass, Redwood Coast Transit will review this plan and its strategies for engaging with non-English speaking populations.

Summary Of Outreach Efforts

Recurring Outreach Efforts

- Redwood Coast Transit provides notice of public hearings by placing posters at the event location, on buses, placing notices on the RCTA website, and often in the local newspaper.
- Redwood Coast Transit staff consults with Tribal governments and staff of social service agencies as needed, often through the Del Norte Local Transportation Commission.
- Brochures, schedules, and printed information are distributed online and to the following locations throughout Del Norte County:

Crescent City

- Harrington House Shelter
- Redwood National and State Parks
- Del Norte County Social Services
- Redwood Coast Regional Center
- Coastline Enterprises
- Del Norte High School
- Del Norte Unified School District
- Del Norte Workforce Center
- Northern California Indian Development Center
- Elk Valley Rancheria Headstart
- N. Coast Childrens Services Headstart
- Del Norte Healthcare District Community Wellness Center
- Chamber of Commerce
- Elk Valley Rancheria Casino
- Curly Redwood Motel
- Super 8 Motel
- Ocean View Inn
- Ocean World Aquarium
- Lighthouse Inn
- Anchor Beach Inn
- Surf Apartments
- America’s Best Value Inn
- Wild Rivers Foundation
- Oregon Street Senior Apartments
- Sutter Coast Hospital
- Summer Lane Park Apartments

- Westward Inn
- United Indian Health Center
- Sutter Walk-In Clinic
- Del Norte Senior Center
- Del Norte Cultural Center
- Oceanfront Inn
- Motel 6
- Best Western Hotel
- Quality Inn
- Bay View Hotel
- Crescent Beach Inn
- College of the Redwoods
- Allied Cash Advance
- Advance America Cash Advance

Gasquet

- Gasquet Mobile Home Park
- Gasquet Market

Hiouchi

- Hiouchi Hamlet
- Hiouchi Motel

Klamath

- Pem Mey Market (Yurok Tribe)
- Klamath River Early College of the Redwoods

Smith River

- Lucky 7 Casino, Smith River Rancheria
- Smith River Headstart
- Howonquet Headstart

Recent Project-Related Outreach

- 2017 On-Board Survey for 2018-19 Short Range Transit Plan
Outreach included:
 - Full 3-day on-board survey conducted by professional surveyors riding a representative sample of RCTA bus routes, including Dial-A-Ride
 - Riders were queried on various satisfaction metrics, as well as direct questions germane to upcoming planning projects, such as safety and security, trade-offs between access and route efficiency, unserved destinations, potential projects.
 - 149 surveys were completed and tabulated and presented to Board of Directors, and included in 2018-19 Short Range Transit Plan as Appendices.
- 2017 Focus Group Stakeholder Interviews for 2018-19 Short Range Transit Plan
Outreach included:
 - Series of individual and small group exploratory interviews with various stakeholder groups including riders, community leaders, school district leaders, and representatives from the parks and tourism industry.
 - Community perceptions of RCTA and particular issues surrounding system image, tourism support opportunities, additional destinations and services, etc.
 - 5 separate interviews were completed and the resulting report presented to Board of Directors, and included in 2018-19 Short Range Transit Plan as Appendices.
- 2018-19 Short Range Transit Plan
Outreach included:
 - Some additional outreach included ride-alongs and two public meetings to seek public input on RCTA and potential areas of improvement and transit needs.
 - Results of these outreach efforts were presented to the Board of Directors, and included in 2018-19 Short Range Transit Plan as Appendices.
- 2019 Student Focus Groups
RCTA worked with Del Norte High School to Organize Lunchtime Pizza Party:
 - 8-10 students attended and were walked through a series of questions about their awareness and usage of the new RCTA Route 300 and RCTA services in general – pizza and refreshments were provided. RCTA facilitated the party.
 - Input received from students indicated general lack of awareness of the services, although some had already become occasional riders.
 - Students suggested stronger collaboration with the school officials to convey the availability of RCTA services on campus. All they hear about is yellow bus info.

In addition, since 2016, all RCTA Board of Directors meetings are streamed live and archived and made available to the public for viewing anytime at <https://media.co.del-norte.ca.us/>

Redwood Coast Transit's Language Assistance Plan

Updated: September 2023



**Redwood Coast Transit Authority
140 Williams Drive
Crescent City, CA 95531**

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1. Introduction

This Language Assistance Plan was developed during the process of developing the Title VI Program for Redwood Coast Transit and is being updated together. The Title VI Program complies with federal requirements and ensures that Redwood Coast Transit services are provided without discrimination on the basis of race, color, or notational origin. Through this Language Assistance Plan, the Title VI program also ensures that Redwood Coast Transit's services are accessible to limited English Proficient (LEP) individuals.

Title VI of the 1964 Civil Right Act is one of two federal mandates that guarantee the provision of meaningful access to federally-funded services for LEP individuals:

- Title VI of the 1964 Civil Right Act prohibits federally-funded agencies from discriminating against individuals based on race, color and national origin and includes meaningful access to LEP customers.
- President's Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (August 11, 2000): Instructs federal agencies to improve access to services by mandating that any federally conducted or assisted programs of activities (e.g. recipients of federal funding) must provide meaningful access to LEP customers.

Redwood Coast Transit's Title VI Program was prepared in May and June 2014 in accordance with FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, October 1, 2012 and updated in April, 2017 and again here in August 2020.

More information about Redwood Coast Transit's Title VI Program is available at:
<http://www.redwoodcoasttransit.org>

2. Overview of Redwood Coast Transit's Service Area and Services

Redwood Coast Transit Authority is a joint powers authority between Del Norte County and the City of Crescent City, with a Board of Directors comprised of two members each from the

County Board of Supervisors and the Crescent City Council, and one at-large member. The agency has no employees. Redwood Coast Transit Authority contracts with a private contractor for operations and maintenance (First Transit); and with the consulting firm, Herron Consulting/TMTP Consulting providing administration and management services. Herron/TMTP began providing management and administration services in April 2016.

From 2017-early 2020 Redwood Coast Transit operated approximately 370,000 miles per year to carry about 110,000 passengers. Service was operated six days per week prior to April 2020 then reduced to Monday through Friday during the first year plus of the COVID-19 Pandemic, then returned to six days per week from June 2021 to present.

Redwood Coast Transit operates one intercity deviated fixed route (Route 20), and one regional deviated fixed routes (199) connecting smaller communities to Crescent City, and four local fixed routes (1/Blue, 2/Red, 3/Green, 4/Gold) plus dial-a-ride in the Crescent City area. The Crescent City dial-a-ride service is available to the general public at a premium fare, but adheres to the ADA paratransit service parameters regarding fares, reservations, and capacity constraints.

Redwood Coast Transit connects with Greyhound and Amtrak Thruway buses in Eureka/Arcata, with the Southwest Point bus service to Medford and Klamath Falls in Crescent City, and with the Curry Public Transit Coastal Express at Smith River.

Redwood Coast Transit operations are based in an operations and maintenance facility located at 140 Williams Drive, Crescent City, CA. First Transit employs a total of 19 people including a project manager, safety manager, mechanic, shop assistant, two dispatchers, and 13 vehicle operators.

3. Language Assistance Goals

Redwood Coast Transit is committed to making its services and programs available to LEP persons as part of its compliance to Title VI of the Civil Rights Act of 1964.

Redwood Coast Transit's goal is to provide meaningful access for LEP customers to Redwood Coast Transit's services, information and materials by developing a Language Assistance Plan and by regular evaluation of the developed methods and strategies.

4. Results of the Four Factor Analysis

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.

Census Data

Redwood Coast Transit used available census data to identify LEP populations within Del Norte County. Table 4-1 demonstrates the various populations residing in Del Norte County that speak English “less than very well.”

Table 4-1

	Del Norte County, California	
Label	Estimate	Margin of Error
Total:	26,101	±119
Speak only English	22,774	±497
Spanish:	2,065	±380
Speak English "very well"	1,251	±259
Speak English less than "very well"	814	±237
French, Haitian, or Cajun:	4	±4
Speak English "very well"	4	±4
Speak English less than "very well"	0	±25
German or other West Germanic languages:	34	±33
Speak English "very well"	34	±33
Speak English less than "very well"	0	±25
Russian, Polish, or other Slavic languages:	65	±81
Speak English "very well"	58	±76
Speak English less than "very well"	7	±11
Other Indo-European languages:	219	±146
Speak English "very well"	86	±78
Speak English less than "very well"	133	±101
Korean:	106	±110
Speak English "very well"	24	±19
Speak English less than "very well"	82	±98
Chinese (incl. Mandarin, Cantonese):	39	±35
Speak English "very well"	24	±29
Speak English less than "very well"	15	±20
Vietnamese:	120	±153
Speak English "very well"	11	±33
Speak English less than "very well"	109	±123
Tagalog (incl. Filipino):	92	±118
Speak English "very well"	51	±63
Speak English less than "very well"	41	±77
Other Asian and Pacific Island languages:	312	±230
Speak English "very well"	197	±167
Speak English less than "very well"	115	±100
Arabic:	209	±162
Speak English "very well"	164	±130
Speak English less than "very well"	45	±49
Other and unspecified languages:	62	±48
Speak English "very well"	62	±48
Speak English less than "very well"	0	±25

Safe Harbor Threshold

As demonstrated in Table 4-1, there are no LEP language groups that exceed the Safe Harbor threshold of five percent (5%) of the population, or 1,000 persons, whichever is less.

Spanish speakers are the group with the greatest number of LEP individuals with an estimated

814 persons who speak English less than very well. These 814 individuals comprise only 3.11% of the Del Norte County population. California Department of Finance estimates of population growth by race and ethnicity suggest that the number and percentage of Spanish speaking LEP individuals will not exceed the threshold levels until after 2030. All other LEP language groups have under or only slightly above 100 individuals and less than one percent of the service area population.

Redwood Coast Transit will continue to monitor the proportions of LEP individuals and corresponding languages as detailed in Section 6 in the following pages.

Factor 2: The frequency with which LEP persons come into contact with the program.

Redwood Coast Transit used several strategies to complete Factor 2 and Factor 3, including proactive outreach and surveying Redwood Coast Transit staff.

Redwood Coast Transit Staff Survey

13 staff members completed the survey. These included 10 drivers, 2 dispatcher/telephone operator, and the contractor's site manager. Both dispatchers also drive when needed. Most of the drivers and the dispatcher reported having interaction with Limited English Proficient Speakers within the previous month.

When asked to identify how often they interact while on their jobs with LEPs, the following Table 4-2 data was reported. Ten staff members, accounting for 77% of the total, report either infrequent interaction or interaction 1 to 3 times per week. The remaining staff members reported interacting frequently, all reporting 4 to 5 times per week.

Table 4-2

Interaction with LEP Persons	Number of Times Reported - choose ONLY one
Infrequently	4
1-3 Times Per Week	6
4-5 Times Per Week	3
Daily or More than 1x Per Day	0

Languages Spoken

Most Redwood Coast Transit staff members were able to identify the languages spoken by LEP individuals. The languages (or language groups) shown in table 4-3 were reported. Most LEP individuals are Spanish speakers.

Table 4-3

Language	Mark a Check for Each (choose zero, one, or more)
Spanish	9
Hmong	5
American Sign Language (hearing)	1
Other (unknown indo-european)	1

Questions Asked by LEP persons about Redwood Coast Transit

The following topics were reported as asked by LEPs:

Table 4-4

Topic	Mark a Check for Each (choose zero, one or more)
Schedules	8
Destinations	7
Which Bus to Take	10
Fares/Passes	10
Other (write in)	0

Communication with LEPs

Nine of the thirteen employees that responded to this question felt they were able to successfully communicate with LEP individuals some or all of the time. Employees reported using the methods shown in Table 4-5 to communicate with LEP riders.

Table 4-5

Method	Mark a Check for Each (choose zero, one or more)
I speak limited Spanish	1
I am relatively fluent in Spanish	1
Gestures	0
Help of Other Passengers	7
Call Dispatch for Language Assistance	0
Telecommunication Device for Deaf	0

Some of the RCTA staff members who are vehicle operators report that they speak either limited Spanish or are fluent in Spanish. Staff members are creative and customer oriented in their efforts to assist LEP speakers. Conversational Spanish information, especially transportation-oriented vocabulary, is shared among drivers to help passengers. Most LEP passengers travel with friends or family that are fluent in English to help assist.

LEP Interaction with Redwood Coast Transit:

Vehicle operators reported encountering LEP riders on the following routes. The most occurrences take place in Crescent City on the local routes, and on Route 20; Neither Dial-A-Ride nor Route 199 feature many LEP encounters.

Table 4-6

Routes w/LEPs	Mark a Check for Each (choose zero, one or more)
CC Locals - Routes 1-4	7
CC Dial-A-Ride	0
Route 199	0
Route 20	4

On Board Passenger Surveys

RCTA has not done an on-board survey since the last one described below. Lack of planning funds and the COVID-19 pandemic have prevented RCTA from refreshing its on-board survey data. RCTA hopes to conduct another on-board survey as part of its next Short Range Transit Plan, hopefully by 2025.

As part of its 2018-19 Short Range Transit Plan/Transit Development Plan outreach efforts, in late 2017 Redwood Coast Transit conducted on board passenger surveys on all bus routes and Dial-A-Ride. The onboard passenger survey asked individuals about their interaction with Redwood Coast Transit, their satisfaction with various aspects of the service, and their ability to obtain information about the service. The survey was translated into Spanish and individuals were invited to respond about their experience with Redwood Coast Transit. Of the 149 surveys completed by Redwood Coast Transit passengers, only 5 were completed in Spanish. This is 3.35% of the total and about what was expected based on census data.

The 5 Spanish language responses were from adults aged 25-61. A mix of male and females responded, with incomes reported under \$20k/year. One reported riding 2 to 4 days per week, and the other reported riding 1-4 days per month. Both reported using a mix of Google Maps and the RCTA Website for service information. In general, the 5 Spanish surveys ranked RCTA even higher than the overall ridership base in various satisfaction metrics.

Key Organizations – 2017 Focus Group Outreach Sessions

RCTA participates in standing local committee and social service agency meetings as often as possible, and exchanges data with officials from these key agencies that also provide direct services to LEP populations. RCTA conducted a student rider focus group in December of 2019, just before the pandemic hit. No additional focus groups have occurred since late 2019.

As part of the 2018-19 Short Range Transit Plan/Transportation Development Plan late 2017 outreach efforts RCTA convened small group focus group workshops with several key stakeholder groups, including the local schools and the College of the Redwoods, National and State Parks, lodging owners, and local leaders of social service and philanthropic groups. These efforts were helpful to identify key organizations or contacts in the community that serve LEPs and gaining information from those individuals and their consumers. These contacts will be critical as Redwood Coast Transit works to improve the efficacy of its language assistance efforts.

Results of LEP Outreach Activity As It Relates To Frequency of Use

Outreach efforts in 2017 produced only two Spanish language surveys. In addition to this small sample, the staff survey provides information about how often LEP passengers interact with drivers on the various routes. Based on this limited information, it appears likely that:

- LEP passengers utilize Crescent City local routes 1-3 times per week.
- LEP passengers use Route 20 (Regional, Smith River to Arcata) on a somewhat regular basis. Drivers reported interaction with LEP passengers 1 to 3 times per week.
- Use of Route 199, and Dial-A-Ride, by LEP users is infrequent.
- The most frequent LEP users are Spanish-speaking, followed by unknown Indo-European languages, and Hmong.

Spanish language information may be beneficial on all routes, but is particularly important to assist LEP individuals on the higher use Route 20 and Crescent City routes. The areas served by higher use routes are consistent with other community surveys, and this helps to target areas for additional outreach efforts to individuals who may not yet be riders.

- Dial-A-Ride and route deviation (available on Routes 20 and 199) use by LEP passengers is infrequent. Dispatch personnel report infrequent contact with LEP individuals. LEP Spanish-speaking survey respondents reported using telephone information services as well as the RCTA website and Google Maps for service information.

RCTA has long offered the availability of free telephone interpretation service for LEP persons to obtain information about transit services and to schedule dial-a-ride and route deviation service. Google Translate is available for Spanish language users by clicking on the lower-left corner of each RCTA webpage.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people’s lives

Redwood Coast Transit understands that its services are used for life-sustaining activities, such as transportation to work, grocery shopping, non-emergency medical appointments, as well as life-enriching activities, such as school, and social events. For transit-dependent individuals, Redwood Coast Transit services are gravely important. For this reason, Redwood Coast Transit is committed to translating vital documents relating to its service. Vital documents are those that demonstrate where and how to use Redwood Coast Transit, how to access services and additional pertinent information. The implementation for translating these vital documents is detailed below in Section 5.

Results of LEP Outreach Activity (as it relates to importance of services)

Though response was limited, the LEP outreach did reveal that LEP individuals may be transit dependent persons who use Redwood Coast Transit for life-sustaining activities.

- Spanish language survey respondents reported a lack of private transportation or driver's licenses.
- Trip purposes of survey respondents included shopping and recreational/social.

Literacy of LEP communities:

Information from social service agencies, schools, and outreach efforts suggests that the Spanish-speaking community reads in Spanish and would benefit from written translations of transit materials. RCTA's admin team features a marketing person fluent in Spanish who routinely translates rider alerts and service information into Spanish. Many RCTA written correspondence items (car cards, notices) are published in both English and Spanish.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

Redwood Coast Transit provides service in a sparsely populated rural area that offers very limited media resources. Due to these conditions, outreach will need to be varied and, at times, event specific. Redwood Coast Transit's Public Participation Plan lays out the types of outreach activities that will be undertaken for the various types of projects and public events.

Due to the lack of concentrated events and RCTA's remote managerial model, a large proportion of outreach will be most effective through continuing to cultivate relationships with key contacts within the LEP populations, and with community organizations that serve LEP populations. As identified in the Public Participation Plan, keeping these contacts informed of Redwood Coast Transit's activities, services and events, and working with them to connect with the LEP populations will be an important outreach activity with little or no associated costs.

Table 4-7, below, identifies several potential outreach strategies that may be utilized as is appropriate and their associated costs.

Some of these strategies, such as Spanish language advertisements on radio stations and in magazines will be utilized if such outlets are identified and as funding is available. RCTA has only recently began to expend a modest amount of funding for English-language radio, making an investment in Spanish radio difficult to justify with such a small percentage of Spanish-speaking residents. There are no nearby Spanish radio stations in the RCTA service area.

Table 4-7

RCTA Title VI Program - LEP Four Factor Analysis: Factor 4

Translation of Written Documents		Interpretation & Translation Services		Advertisements & Outreach	
Specific elements	Unit Costs (range)	Specific elements	Unit Costs	Specific elements	Unit Costs
<i>Vital Documents:</i>		Language Line	\$1.45 per minute as utilized	Design/print posters - "Availability of Language Assistance	To be determined on a case by case basis
Title VI Notice to the Public	\$100-\$120	Simultaneous interpreter when required for public events	To be determined on a case by case basis	Spanish-language radio spots (optional)	To be determined on a case by case basis
Complaint Form	\$100-\$120			Adverts in Spanish-language publications (optional)	To be determined on a case by case basis
Complaint Procedures	\$100-\$120				
Rider Guide	\$100-\$120				
ADA Application	\$100-\$120				
Signage advertising the Redwood Coast Transit language assistance program	\$100-\$120				
System Map	\$100-\$120				
Individual route schedules where practical	\$100-\$120				
<i>Ad-hoc Documents:</i>					
Fliers/advertisements for public events	\$100-\$120				
Redwood Coast Transit website	Translation approach to be determined.				

Safe Harbor Provision

The Federal Transit Authority Circular 4702.1B states:

"DOT has adopted DOJ's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

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

5. Implementation Plan

Timeline/ Major Milestones

Responsibility for Implementing the Language Assistance Plan

This Plan, as well as other elements of the Title VI Program, will be implemented by the Title VI Program Administrator Joseph Rye.

Language Service Provision

Interpretation Services

1. Redwood Coast Transit has a contract with Language Line to provide oral interpretation as needed for LEP callers or visitors. Each RCTA webpage offers one-click Google Translate.
2. Redwood Coast Transit has publicized information about language assistance on its posted Title VI Notice. Public events will also be publicized in English and Spanish with information about how to request interpretation.
3. Simultaneous interpretation at public events will be determined on a case-by-case basis by examining several factors, such as:
 - The type and size of event;
 - The availability of a staff member of RCTA or a host organization to interpret, etc.;
 - The suitability of other interpretation strategies such as Language Line speaker phone;
 - Requests received 72 hours before an event.

Translation of Vital Documents

1. Title VI documents have been translated into LEP language identified during the four-factor analysis. Developing this Plan included translating “Stage One” and “Stage Two” vital documents.

Vital Documents – Stage One

1) Title VI Program

- Title VI Notice to the Public
- Complaint Form
- Complaint Procedures

Vital Documents – Stage Two

2) Rider and ADA Information

3) Signage advertising the Redwood Coast Transit’s Language Assistance Program, particularly the Language Line number

4) Individual route schedules, where practical

2. The extent of Redwood Coast Transit’s ability and obligation to continue translating written documents, specifically those beyond Stage Two, will be determined on a case-by-case basis, by looking at elements presented in the Four Factor Analysis. This approach recognizes that there are no LEP language groups that exceed the Safe Harbor threshold of five percent (5%) of the population, or 1,000 persons, whichever is less, while also acknowledging the importance of other factors in determining the need for language assistance. RCTA struggles with a small marketing budget and limited media options in general.

Redwood Coast Transit's Website

Title VI information in English and Spanish is available on Redwood Coast Transit's website at: www.redwoodcoasttransit.org

As additional materials, including information about public hearings, input opportunities and major projects, are translated into LEP languages, they will be provided on the website.

A link to www.google.com/translate has been included on the RCTA home page and provides content translation for the entire website into dozens of languages.

Outreach

1. To ensure that LEP individuals are aware of language assistance measures, Redwood Coast Transit has included information about language assistance in its Title VI Notice to the Public.
2. Title VI information is available on the website in English and Spanish.
3. As possible and appropriate, Redwood Coast Transit will develop simple signage advertising its Language Assistance Program and Language Line program and post these at bus stop shelters and other community locations.
4. Staff will inform residents about Language Assistance Program during their outreach and transit-orientation activities.
5. Staff will continue developing relationships with organizations that serve LEP individuals and developing strategies to spread awareness of Redwood Coast Transit's Language Assistance Program and transit services.

6. Monitoring, Evaluating, and Updating the LAP

1. A thorough review of this Language Assistance Plan (LAP) will be undertaken every three years concurrent with updating and submitting the Title VI Program. At that time, the LEP population will be reassessed to ensure all significant LEP languages are included in Redwood Coast Transit Authority's language assistance efforts. The following reoccurring reporting and evaluation measures will be used to update the Language Assistance Plan.
2. Redwood Coast Transit will regularly assess the effectiveness of how Redwood Coast Transit and contracted staff members communicate with LEP individuals by:
 - Including questions about language assistance and information needs on any transit surveys
 - Conversations with community agencies that work with LEPs
 - Rider surveys or other input opportunities will be available in LEP languages (currently Spanish)
3. Staff will track its language assistance efforts, including:
 - Reporting front-line staff's interactions with LEP
 - Reports and updates from Language Line: Language Line provides statistical data about Language Line interpretation use, enabling Redwood Coast Transit to document the number of calls, the language, and minutes of use.

7. Staff Training

1. Redwood Coast Transit Authority requires Title VI compliance and language assistance of its operation contractor, Transdev, formerly known as First Transit, per its 2021 First Transit RCTA Proposal.
2. As a minimum, Redwood Coast Transit's operations contractor must provide the following training for its staff:
 - How to respond to LEP callers.
 - How to respond to LEP individuals in person.
 - How to document LEP needs.
 - How to respond to correspondence from LEP persons.
 - How to respond to civil rights complaints.

8. Appendix A

Table Depicting the Membership of Non-Elected Committees and Councils

This requirement is not applicable as Redwood Coast Transit does not have any non-elected committees or councils.

Description of Subrecipient Monitoring and Schedule of Subrecipient Title VI Program Submissions

This requirement is not applicable as Redwood Coast Transit does not have any subrecipients at this time and does not anticipate expanding to include subrecipients. In the case that Redwood Coast Transit Authority does work with subrecipients, Redwood Coast Transit will revisit this issue to ensure compliance.

Title VI Equity Analysis

Since its last Title VI Certifications and Assurances, Redwood Coast Transit Authority has not built or sited a new location and therefore did not need to undertake a Title VI Equity Analysis.

Redwood Coast Transit Authority has not built or sited a construction project since the agency was formed in 2005. Redwood Coast Transit Authority's current headquarters and maintenance facility was built by the County of Del Norte for transit purposes. The facility is built on land leased by Redwood Coast Transit Authority.

Additional Information for Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000: System-Wide Policies and Service Standards

Effective Practices to Fulfill the Service Standard Requirement

Not applicable to RCTA, who operates under 10 vehicle in peak service.

Redwood Coast Transit Authority Board of Director's Approval of Redwood Coast Transit Authority's Title VI Program

Placeholder – last update approval - 2020

REDWOOD COAST TRANSIT AUTHORITY RESOLUTION NO. 2020-21-01

RESOLUTION ADOPTING THE 2020 UPDATE TO THE REDWOOD COAST TRANSIT AUTHORITY'S TITLE VI PLAN

WHEREAS, the Redwood Coast Transit Authority (RCTA) desires to comply with Title VI of the 1965 Civil Rights Act, including new provisions detailed in the United States Department of Transportation Federal Transit Administration Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients"; and

WHEREAS, Redwood Coast Transit Authority wishes to authorize approval of this 2020 Update to the RCTA Title VI Plan as crafted by its contracted Management firm, Herron/TMTP Consulting to comply with necessary provisions of the Civil Rights Act; and

WHEREAS, the Redwood Coast Transit Authority Title VI Plan as adopted here today has been reviewed for compliance by the California Department of Transportation (Caltrans) and deemed satisfactory and requires official Board Adoption; and

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of the Redwood Coast Transit Authority that

1. The General Manager is authorized to implement the 2020 Update to the RCTA Title VI Plan in order to meet federal requirements.
2. The General Manager is authorized to implement policies that may be necessary to comply with subsequent revisions or interpretations to the Civil Rights Act.

PASSED AND ADOPTED by the Redwood Coast Transit Authority of the County of Del Norte, State of California, at a regular meeting of said Commission or Board Meeting held on August 24, 2020 by the following vote:

AYES:

NOES:

ABSENT:

WHEREUPON, THE CHAIRMAN DECLARED THE RESOLUTION ADOPTED, AND SO ORDERED.


Secretary


Alex Fallman, Chair

**Redwood Coast Transit Authority's
TITLE VI PROGRAM**

APPENDIX A

**Translated Title VI Notice and
Forms - Spanish**

Spanish Language Complaint Procedures Instructions

Procedimientos de Quejas del Título VI

Cualquier persona que cree o que ha sido objeto de discriminación por motivos de raza, color u origen nacional por Redwood Coast Transit Authority puede presentar una queja del Título VI, completando el Formulario de Queja del Título VI de Redwood Coast Transit. Redwood Coast Transit investigará las quejas recibidas no más de 180 días después del supuesto incidente. Redwood Coast Transit sólo procesará las denuncias que sean completas. Los siguientes procedimientos serán seguidos para investigar las quejas formales del Título VI:

- Dentro de los 10 días hábiles de haber recibido la queja, el administrador de Title VI de Redwood Coast Transit la revisará para determinar si nuestra oficina tiene jurisdicción. El autor recibirá un acuse de recibo informando a él / ella si la queja será investigada por nuestra oficina.
- Se llevó a cabo la investigación y se terminó dentro de los 30 días siguientes a la recepción de la queja formal.
- Si se necesita más información para resolver el caso, Redwood Coast Transit puede ponerse en contacto con el demandante. El demandante tiene 10 días hábiles desde la fecha de la carta para enviar la información solicitada al administrador de Title VI. Si el investigador no está en contacto con el reclamante o no recibe la información adicional dentro de los 10 días hábiles, Redwood Coast Transit administrativamente puede cerrar el caso.
- El denunciante será notificado por escrito de la causa a cualquier ampliación prevista de la norma de los 30 días.
- Un caso puede ser cerrado administrativamente también si el autor ya no desea seguir su caso. Tras la investigación, el administrador de Title VI emitirá una de las dos cartas a la demandante: 1) una carta de cierre o 2) una carta de encontrar. En una carta de cierre se resume las alegaciones y afirma que no había una violación del Título VI, y que el caso se cerrará. En carta de encontrar resume los hechos denunciados y de las entrevistas sobre el supuesto incidente, y explica si alguna acción disciplinaria, se producirá la formación adicional del miembro del personal, u otra acción.
- Si el demandante no está satisfecho con la decisión, él / ella tiene 30 días después de la fecha de la carta de cierre de Redwood Coast Transit o carta de encontrar para apelar a la junta directiva de Redwood Coast Transit o el personal autorizado. El demandante tiene derecho a revisar la negación, para presentar información y argumentos adicionales, y para la separación de funciones (es decir, una decisión de una persona no involucrada con la decisión inicial de negar la elegibilidad). El demandante tiene derecho a recibir una notificación por escrito de la decisión de la apelación y las razones para ello.
- El demandante también puede presentar una queja directamente con la Administración Federal de Tránsito, de la siguiente manera: Coordinador del Título VI del Programa, FTA Oficina de Derechos Civiles, Edificio Este, 5º piso - TCR, 1200 New Jersey Ave, SE, Washington, DC 20590.

Spanish Language Complaint Form, Page 1

Título VI Formulario de Queja de Redwood Coast Transit Authority

Sección 1:		
1. Nombre:		
2. Dirección:		
3. Teléfono (casa):	3.a. Teléfono (móvil o trabajo):	
4. Correo Electrónico:		
5. ¿Usted requiere formatos accesibles? ¿Cuáles?		
Sección 2 -		
6. Cuenta con la persona que sufrió la discriminación (si es diferente a la persona que presenta la denuncia):		
7. Nombre y dirección:		
8. Su relación:		
9. Explique la razón por la que presenta la queja como tercera persona:		
10. Confirme que cuenta, con el permiso de la parte agravada para presentar esta queja como tercera persona:	SI	NO
Sección 3:		
11. ¿Cuáles de las siguientes razones describe mejor el motivo de su queja? Fue por su:		
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen nacional		
12. ¿Cuándo ocurrió la supuesta discriminación?		
13. En sus propias palabras, describa la supuesta discriminación. Explique lo que pasó y quién considera usted que fue responsable. Por favor utilice el reverso de este formulario si necesita espacio adicional.		

Spanish Title VI Complaint Form, Page 2

**Título VI Formulario de Queja de Redwood Coast Transit Authority,
Página 2**

Sección 4:			
14. ¿Cuenta con alguna queja previa sobre discriminación según el Título VI con Redwood Coast Transit Authority?	Sí, por este incidente	Sí, por otro incidente	No
Sección 5:			
15. ¿Ha llevado esta queja a alguna otra agencia o a una corte? <input type="checkbox"/> SÍ <input type="checkbox"/> NO *En caso afirmativo, marque cada casilla que corresponda: <input type="checkbox"/> Agencia Federal _____ <input type="checkbox"/> Agencia Estatal _____ <input type="checkbox"/> Corte Federal _____ <input type="checkbox"/> Agencia Local _____ <input type="checkbox"/> Corte Estatal _____			
16. Por favor proporcione información sobre una persona de contacto en la agencia o corte donde se presentó la denuncia:			
Nombre:			
Dirección:			
Agencia :			
Teléfono:			
Correo Electrónico:			

Usted puede adjuntar cualquier material escrito o cualquier otra información que considere relevante para su denuncia.

Por favor firme a continuación para dar fe que es cierto la información que está proporcionando.

Firma del denunciante _____ Fecha _____

Complete y envíe este formulario a:

Joseph Rye, Title VI Program
 Administrator Redwood Coast Transit
 Authority
 Title VI Program Administrator
 140 Williams Drive
 Crescent City, CA 95531