

Monterey-Salinas Transit 2014-2016 Title VI Plan Update



Adopted May 12, 2014



**One Ryan Ranch Road
Monterey, CA 93940**

Civil Rights Contact: Michelle Overmeyer (831) 393-8131



RESOLUTION 2014-21

RESOLUTION APPROVING THE 2014-2016 TITLE VI PLAN UPDATE

WHEREAS, the Monterey-Salinas Transit District was established under AB644, the Monterey-Salinas Transit District Act (District Act) signed into law on October 11, 2009, and found at California Public Utilities Code, section 106,000; and

WHEREAS, Monterey-Salinas Transit receives federal funds to provide public transportation to Monterey County; and

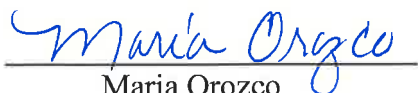
WHEREAS, Monterey-Salinas Transit commits to assure that no person shall, on the grounds of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination under any MST program or activity regardless of the funding source; and

WHEREAS, Monterey-Salinas Transit must promote full and fair participation in public transportation decision-making; and

WHEREAS, Monterey-Salinas Transit must ensure meaningful access to transit-related programs and activities by persons with Limited English Proficiency; and

WHEREAS, Monterey-Salinas Transit is required by the Federal Transit Administration to prepare and submit a Title VI Plan reaffirming Monterey-Salinas Transit's commitment to nondiscrimination once every three years.

NOW, THEREFORE, BE IT RESOLVED that the Board of Directors of Monterey-Salinas Transit approves the 2014-2016 Title VI Plan Update.


Maria Orozco
Chairman


Carl Sedoryk
Secretary

PASSED AND ADOPTED BY THE MONTEREY-SALINAS TRANSIT BOARD OF
DIRECTORS THIS 14th day of April, 2014, by the following vote:

AYES: Directors: Armenta, Barrera, Beach, Cohen, Downey, Edwards, O'Connell,
Orozco, Pendergrass, Stephens

NOES: Directors:

ABSENT: Directors: Clark, Hughes, Hurley

ATTEST:


Board Secretary (Deputy)

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1. Introduction

Monterey-Salinas Transit (MST) was created by California law AB 644 and formed July 1, 2010. The district succeeds Monterey-Salinas Transit Joint Powers Agency formed in 1981 when the City of Salinas joined the Monterey Peninsula Transit Joint Powers Agency, which was formed in 1972. Current members of the district are the Cities of Carmel, Del Rey Oaks, Gonzales, Greenfield, King City, Marina, Monterey, Pacific Grove, Salinas, Sand City, Seaside, Soledad and the County of Monterey. A board of directors with a representative from each member jurisdiction governs the agency and appoints the general manager. MST serves a 280-square-mile area of Monterey County, Southern Santa Cruz County, and Santa Clara County. MST's 60 routes serve an estimated population of 427,000 based upon the area within ¾ mile of established routes within Monterey County.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

Monterey-Salinas Transit operates programs without regard to race, color, and national origin and is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B.

The 2014 MST Title VI Program includes the following elements per Appendix A of FTA circular 4702.1B:

- Title VI Notice to Beneficiaries
- Title VI complaint procedures and complaint form
- List of transit-related Title VI investigations, complaints and lawsuits
- Public Participation Plan
- Language Assistance Plan for populations with Limited English Proficiency (LEP)
- Membership of decision making bodies
- Sub-recipient monitoring
- Equity analysis for fixed facilities
- Service Standards for fixed-route service
- Service Policies for distribution of vehicles and amenities

2. Title VI Notice to Beneficiaries

MST provides the following notice on the MST website in English and in Spanish and is included in the Rider's Guide, and posted at all customer service windows, public meeting rooms, and aboard MST buses in bilingual car cards:

Title VI Notice

In compliance with U.S. Department of Transportation Title VI regulations (49 CFR part 21), Monterey-Salinas Transit operates programs without regard to race, color, and national origin. Contact MST at One Ryan Ranch Road, Monterey, California 93940, (831) 899-2558, or www.mst.org to request additional information regarding MST's nondiscrimination 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 MST 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.

Nota de Título VI

En cumplimiento de los reglamentos del Título VI del Departamento de Transporte de los Estados Unidos (49 CFR parte 21), Monterey-Salinas Transit administra programas sin fijarse en la raza, el color y el origen nacional. Comuníquese con MST a One Ryan Ranch Road, Monterey, California 93940, (831) 899-2558, ó www.mst.org para solicitar información adicional sobre la obligación de no discriminar de MST. Cualquier persona que considere que ella o una clase específica de personas ha sufrido discriminación prohibida por el Título VI puede presentar [una queja escrita](#) en nombre propio o mediante un representante a MST o a la oficina de derechos civiles del Departamento Federal de Transporte Público (Federal Transit Administration) (FTA, por sus siglas en inglés), atención: Coordinador del Programa del Título VI, East Building — 5th Floor TCR, 1200 New Jersey Avenue SE, Washington, DC 20590. Se debe presentar la queja a más tardar 180 días después de la fecha de la discriminación en cuestión, a menos que el FTA extienda el plazo para presentar la queja.

3. Title VI Complaint Procedures and Complaint Form

As referenced in the previous section, the Title VI notice below is published (in English and Spanish) on MST's website, in the Rider's Guide, and posted at all customer service windows, public meeting rooms, and aboard MST buses in bilingual car cards and provides direction on how to file a Title VI complaint.

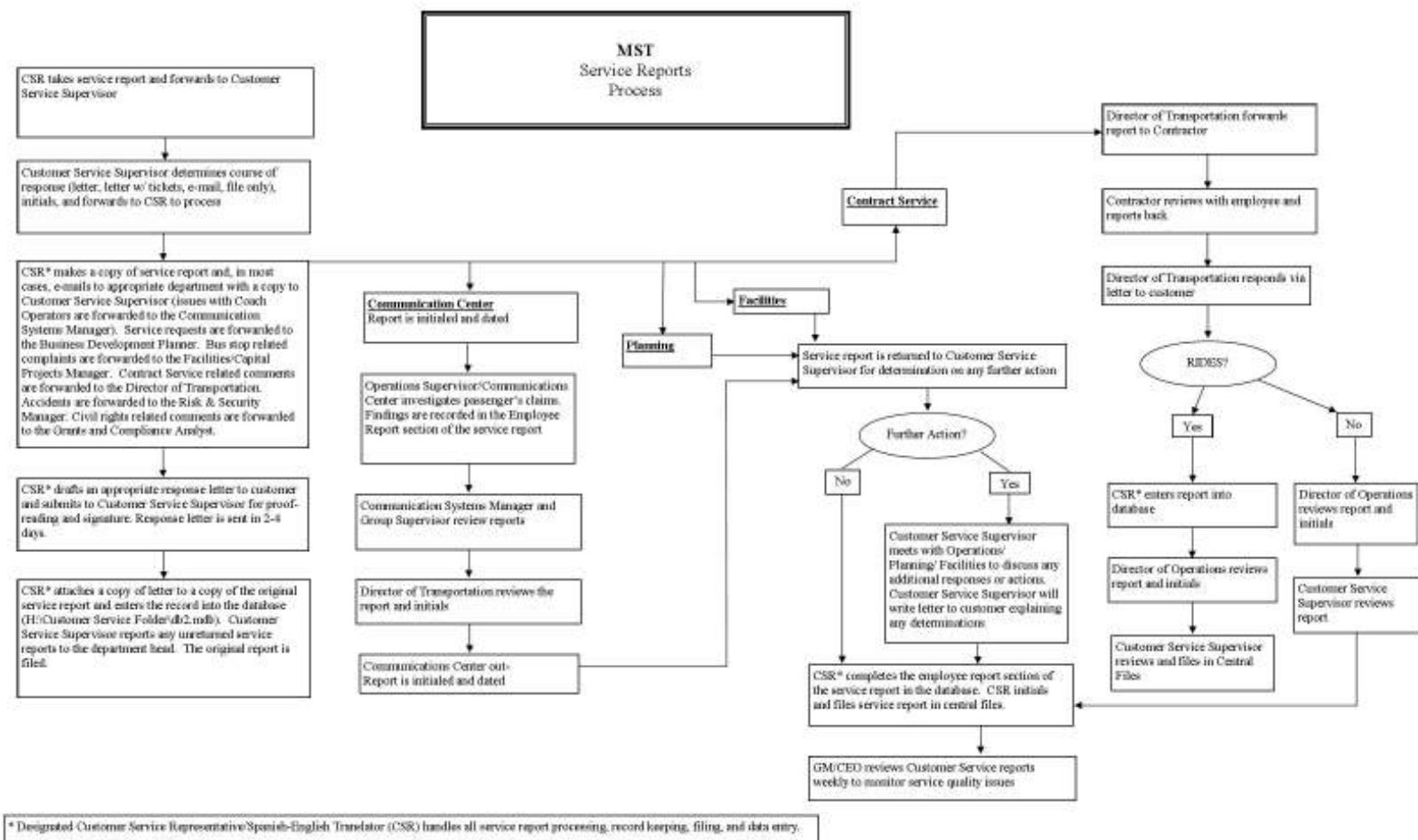
TITLE VI NOTICE

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MST's Title VI complaint form is available on MST's website and provided within this section for English and Spanish.

MST has a public comment database in which every complaint, commendation, suggestion or other input is tracked and processed for resolution. The diagram below contains a copy of the Customer Service Report database procedure that is followed by MST staff. The following explains the steps taken by MST if a Title VI complaint is received:

- If received via phone, fax, email, website or U.S. mail, a Title VI complaint would be logged in by the Customer Service Representative and then forwarded directly to the Grants and Compliance Analyst.
- If a complaint is received from a customer service call, the complainant will be sent a Title VI Complaint form so he/she can submit and sign the form.
- The complainant will be contacted within ten (10) days of receipt of complaint to acknowledge an investigation is beginning.
- The Grants and Compliance Analyst would personally lead and coordinate the investigation of the Title VI complaint.
- The progress of the investigation would be tracked, and a memo to the MST board of directors would be prepared outlining the details of the complaint, the results of the investigation and the recommended remedy to the complaint.
- A closing letter would be provided to the complainant.
- A full accounting of the Title VI complaint and any resulting action would be prepared and readied for submittal to FTA in the next Title VI report and/or on grant applications where requested.



**TITLE VI COMPLAINT FORM/
FORMULARIO DE QUEJAS DEL TITULO VI**

Name/Nombre: _____
Address/Domicilio: _____
City/Ciudad: _____ State/Estado: _____ Zip Code/Código Postal: _____

Home Telephone No./
Teléfono de la casa : () _____

Work Telephone No./
Teléfono del trabajo: () _____

Specific basis of discrimination/ Fundamento específico de la discriminación:

☐ Race/Raza ☐ National Origin/Nacionalidad ☐ Color

Date of alleged discriminatory act(s)/Fecha del presunto acto o actos de discriminación _____

Explain as clearly as possible what happened and how you were discriminated against. Indicate who was involved. Be sure to include the names and contact information of any witnesses. For additional space, attach additional sheets of paper.

Describe de que manera fue discriminado(a). Que sucedió y quiénes fueron los responsables? Si necesita mas espacio, use páginas adicionales.

Have you filed this complaint with any other federal, state, or local agency, or with any federal or state court? Presento esta demanda ante otra agencia local, estatal o federal, o ante un tribunal estatal o federal? ☐ Yes/Si ☐ No

☐ Federal Agency/Agencia federal ☐ Federal Court/Tribunal federal ☐ State Agency/Agencia estatal ☐ State Court/ Tribunal estatal ☐ Local Agency/Agencia local
☐ Date Filed/ Fecha de presentación _____

Please provide contact person information for the additional agency or court/ Proporcione información de contacto del representante de alguna otra organización (agencia or tribunal) ante el cual presento la demanda:

Name/Nombre			
Street Address/Domicilio Calle	City, State/ Ciudad, Estado	Zip/Código postal	Telephone/Teléfono

Sign the complaint below and attach any supporting documents/Firme esta demanda en el espacio que figura a continuación. Incluya todo documento de respaldo

Signature/Firma	Date/Fecha

Title VI Complaint Procedures and Complaint Form

1. Title VI complaint forms may be downloaded from www.mst.org or requested by calling 1-888-MUS-BUS1.
2. If the complainant is unable to write a complaint, MST staff will assist the complainant. If requested by the complainant, MST will provide a language interpreter.
3. Complainants have the right to complain directly to the appropriate agency. Complaints must be filed within one-hundred eighty (180) calendar days of the alleged incident.
4. MST will begin an investigation within ten (10) working days of receipt of a complaint.
5. MST will contact the complainant in writing no later than fifteen (15) working days after receipt of complaint for additional information, if needed. If the complainant fails to provide the requested information in a timely basis, MST may administratively close the complaint.
6. MST will complete the investigation within sixty (60) days of receipt of the complaint. If additional time is needed for the investigation, complainant will be contacted. A written investigation report will be prepared by the investigator. This report shall include a summary description of the incident, findings and recommended corrective action.
7. A closing letter will be provided to the complainant. Parties will have five (5) working days from receipt of the closing letter to appeal. If neither party appeals, the complaint will be closed.
8. If required, the investigation report will be forwarded to the appropriate federal agency.

In compliance with U.S. Department of Transportation Title VI regulations (49 CFR part 21), Monterey-Salinas Transit operates programs without regard to race, color, and national origin. 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 MST 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.

Complaints may be mailed, faxed or emailed to the address below:

Contact Us/ Comuníquese con Nosotros:

Monterey-Salinas Transit, Attn: Title VI Coordinator
One Ryan Ranch Road
Monterey, California 93940
Telephone: 888.678.2871 Fax 831. 899.3954
website: www.mst.org email: mst@mst.org

En cumplimiento de los reglamentos del Título VI del Departamento de Transporte de los Estados Unidos (49 CFR parte 21), Monterey-Salinas Transit administra programas sin fijarse en la raza, el color y el origen nacional. Cualquier persona que considere que ella o una clase específica de personas ha sufrido discriminación prohibida por el Título VI puede presentar una queja escrita en nombre propio o mediante un representante a MST o a la oficina de derechos civiles del Departamento Federal de Transporte Público (Federal Transit Administration) (FTA, por sus siglas en inglés), atención: Coordinador del Programa del Título VI, East Building — 5th Floor TCR, 1200 New Jersey Avenue SE, Washington, DC 20590. Se debe presentar la queja a más tardar 180 días después de la fecha de la discriminación en cuestión, a menos que el FTA extienda el plazo para presentar la queja.

Las quejas podrán ser enviadas por correo, por fax o por correo electrónico a la dirección arriba.

Procedimiento para Quejas y Formulario de quejas del Título VI

1. Los formularios de queja del Título VI pueden descargarse en www.mst.org o llamarse 1-888-MUS-BUS1.
2. Si el demandante no puede escribir la queja, el personal de MST lo asistirá. Si el demandante lo solicita, MST le proveerá un intérprete de idiomas o de lengua de señas.
3. Los demandantes tienen derecho a presentar una queja directamente a la agencia federal que corresponda. Las quejas deberán presentarse dentro de los ciento ochenta (180) días calendario desde el último suceso incidente.
4. MST comenzará una investigación dentro de los diez (10) días hábiles a partir de la recepción de la queja.
5. En caso de que sea necesario solicitar información adicional, MST se comunicará con el demandante por escrito en un plazo de no más de quince (15) días hábiles luego de recibir la queja. Si el demandante no proporcionara la información solicitada de forma oportuna, MST podrá cerrar el caso de forma administrativa.
6. MST completará la investigación dentro de los sesenta (60) días a partir de la recepción de la queja. En caso de necesitar más tiempo para la investigación, se contactará al demandante. El investigador preparará un informe escrito de la investigación. Este informe deberá incluir un resumen de la descripción del incidente, las conclusiones y las medidas correctivas recomendadas.
7. Se le enviará una carta que informe que el caso se ha cerrado al demandante y al demandado o departamento demandado. Las partes tendrán cinco (5) días hábiles desde la recepción de la carta de cierre del caso para apelar. En caso de que ninguna de las partes apele, se cerrará el caso.
8. De ser necesario, se enviará el informe de investigación a la agencia federal correspondiente.

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

No Title VI investigations, complaints or lawsuits have been filed against MST since the last report submission. Complaints, if any, are tracked in the following format.

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

5. Public Participation Plan

Monterey-Salinas Transit employs a number of public outreach efforts to ensure meaningful access to the public including those with Limited English Proficiency (LEP). Please refer to the Language Assistance Plan, Section 6 of this report, for languages and other information related to LEP persons.

CONTINUOUS/ ONGOING EFFORTS

Monthly Board Meetings

The MST board of directors holds monthly public meetings of the full board, as well as small meetings of subcommittees (e.g., Finance, Marketing, Planning & Operations, etc.). The public is invited to attend and provide comment on any matters on the agenda, as well as items not on the agenda. All meetings are noticed on MST's website and a bilingual Customer Service Representative/Spanish-English Translator is present at each board meeting to provide Spanish translation services if needed.

Advisory Committee Meetings

All of MST's programs are planned and implemented with the input and oversight of a group of consumers and social service agency personnel who have first-hand experience using the services and/or in assisting others to do so. The Mobility Advisory Committee (MAC) meets every two months. The MAC meetings are open to the public. The MAC reports directly to the MST board of directors and provides advice and recommendations on improving these services.

A subcommittee of the MAC (ADAPT-R) meets during the months that MAC does not meet. The ADAPT-R subcommittee provides input on programs and plans that would affect MST's ADA paratransit service. The public is invited to attend and provide comments at both MAC and ADAPT-R meetings.

On-board Surveys

MST conducts biennial on-board surveys in both English and Spanish to gauge opinions of customers. This data is used to help improve services for existing and future passengers. A copy of the most recent survey is attached.

Public Hearings

MST conducts public hearings for major changes that result in a 10% or greater decrease in vehicle service hours or passengers on any single line, changes in routing that result in MST vehicles to utilize new streets and/or corridors, or any increase in fares. The agency's Public Hearing policy is attached. Public input is gathered in-person at public meetings and from passenger comments submitted via email, fax and phone communications. The public hearings are advertised in both English and Spanish and are held at various locations and at various times of day to encourage attendance by minority and low income persons. Presentation materials are provided in English and Spanish (see attached), and a Customer Service Representative/Spanish-English Translator is present at each public hearing to provide Spanish translation services if needed.

A public hearing is also conducted annually when MST applies for federal operating assistance. In this case, MST advertises in both English and Spanish the federal grant application process in the local newspaper and offers a 30-day public comment period before a single public hearing takes place at a regularly scheduled board of directors meeting. A copy of the most recent hearing notices are attached.

General Community Meetings: On occasion MST staff conducts public educational meetings. These can take place in an open house or presentation style format. A Customer Service Representative/ Spanish-English Translator is present to provide Spanish translation services if needed. These special meetings are published in public notices printed in local newspapers, displayed on printed message signs inside the buses and included in MST press releases, all in English and Spanish.

MST staff is involved in the South County Outreach Effort (S.C.O.R.E.), a collaborative working group of agencies serving south Monterey County areas as well as the Spanish speaking community. The S.C.O.R.E. group meets monthly to share information on events such as resource fairs, public service presentations, and other educational services.

General Public Outreach: MST regularly issues press releases on its website to notify the public of holiday service schedules, special service, or educational campaigns. An example of a recent press release is attached. All press releases published on MST's website are also sent to the local English and Spanish newspapers, radio and television stations. Information such as route detours or late buses is provided via social media such as Twitter. MST also maintains a Facebook page to engage customers.

MST will be a major sponsor of Viva La Familia in Salinas, a local concert targeting the Hispanic community in the summer of 2014. As a sponsor, MST will have a booth staffed by bilingual customer service staff, and MST bus information will be available.

PREVIOUS PUBLIC OUTREACH OVER THE LAST 3 YEARS

The following events were noticed in English and Spanish, onboard the buses in printed materials in both languages, and through MST's press releases. Public hearing meetings were held throughout the county for each event. Public hearing meetings are generally scheduled on weekday evenings (6pm or 7pm), with an occasional weekend daytime meeting. The location of the public hearing meeting is typically city hall chambers of MST's 12 member city jurisdictions, the County Board of Supervisors chambers, and other community group meeting rooms. All meeting locations must be accessible via MST transit. A Spanish-speaking staff member of MST was present at all the public hearing meetings.

- In April 2011 service and fare changes took place to implement a less confusing and more equitable fare structure. Service changes included expanding operating hours to 24-hour weekend service for some routes. Fare changes involved moving from a complicated pay-by-zone system (i.e., 9 major zones and 5 overlap zones) to a simpler pay-by-route type of system (i.e., neighborhood, primary, regional, and commuter). The half-fare program was extended to all riders (fixed-route, MST OnCall dial-a-ride and paratransit) on Sundays and holidays.

- Route and schedule adjustments took place in September 2011 which reduced operating frequencies during off peak periods.
- Discounted fares for non-half-fare-eligible groups on Sundays and holidays were discontinued in February 2012. (Seniors, disabled, Medicare Card holders, youth and active duty-military maintained their half-fare status at all times.)
- A service change in April 2012 resulted in major and minor routing and scheduling adjustments as well as elimination of selected routes.
- MST's passenger fares were increased in May 2012 in response to high fuel costs and federal funding difficulties. Increases occurred on fixed route, on-call and paratransit services.
- In September 2012, MST implemented a major service change. Changes to routes and schedules were a result of the Salinas Area Service Analysis, a planning study designed to evaluate how well MST's bus service was meeting the needs of the public in and around Salinas. At the same time, the Fremont/Lighthouse Bus Rapid Transit (Jazz BRT) branding was introduced and began interim operations while construction continued on part of the corridor.
- A service change was implemented in May 2013. Both major and minor changes were made to route and schedules.
- A dispute has occurred between labor unions that represent transit workers in California (including MST's bus drivers and mechanics as well as the agency's inventory, facilities, and utility service employees) and the US Department of Labor over the state's recently enacted pension reform for public workers that was signed into law in 2012. The consequences of this dispute for the agency and its customers include the potential withholding of federal funds until a permanent resolution to the pension reform dispute is reached. Because MST uses approximately \$7 million per year in federal operating funds to support the operation of its core routes, staff initiated a thorough public outreach process to develop a potential emergency reduced bus service schedule in the event this dispute is not resolved. As of this date the emergency service plan has not been implemented. The emergency reduced bus service would only be implemented if DOL does not certify the agency's future grant applications for 5307 formula funds.

6. Language Assistance Plan

MST is committed to making public information and customer services accessible to individuals who, as a result of national origin, are limited in their English proficiency. The agency's ongoing efforts to make these services accessible to persons with Limited English Proficiency (LEP) are consistent with the obligations imposed under Title VI of the Civil Rights Act of 1964.

INTRODUCTION

This Language Assistance Plan has been prepared to address MST's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. This plan has been prepared in accordance with Title VI the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq., and is implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin. Federal Transit Administration (FTA) Circular 4702.1B was also used as guidance in preparing this Language Assistance Plan.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency (LEP), 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 obligations to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including Monterey-Salinas Transit, which receives federal assistance through the U.S. Department of Transportation (U.S. DOT).

FOUR-FACTOR ANALYSIS

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

Monterey-Salinas Transit serves Monterey County. Current data indicates a large segment of the population has Limited English Proficiency. As shown in the table below, less than half (47.5%) of the County population speaks English only, whereas 52.5% speak a language other than English. The main language other than English is Spanish (45% of County population) followed by small populations speaking Indo-European, Pacific Islander or other languages. Nearly 29% of the population reports speaking English less than "very well."

Language Spoken at Home

LANGUAGE SPOKEN AT HOME	Number	Percent
Population 5 years and over	383,178	100%
English only	182,162	47.5%
Language other than English	201,016	52.5%
Speak English less than "very well"	110,123	28.7%
Spanish	174,426	45.5%
Speak English less than "very well"	99,139	25.9%
Other Indo-European languages	7,877	2.1%
Speak English less than "very well"	2,120	0.6%
Asian and Pacific Islander languages	15,974	4.2%
Speak English less than "very well"	7,521	2.0%
Other languages	2,739	0.7%
Speak English less than "very well"	1,343	0.4%

Source: 2008-2012 American Community Survey 5-Year Estimate, DP02 Selected Social Characteristics in the United States

The Safe Harbor Provisions require a recipient to provide 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. Data in the table above was further broken down to identify non-Spanish speakers who identify as speaking English less than “very well.” The Safe Harbor Provisions for Monterey County *could* potentially apply to Korean and Tagalog. MST’s planning consultant analyzed the census data to isolate these populations within the urbanized area served by MST. The results indicate 896 Korean- and 1,700 Tagalog-speakers identify with speaking English “less than very well.”

MST’s 2013 biennial on-board survey included a review of actual MST passengers. Eight hundred thirteen (813) passengers were interviewed. The majority of the respondents (63.3%) identified English as the primary language spoken at home. Passengers primarily speaking Spanish at home comprised 22.6% of the respondents. Ten percent (10%) of respondents reported speaking another language at home, and 4.1% declined to state the primary language spoken at home. Of the 10% that identified “other,” one person identified Korean as the primary language spoke at home, and four people identified Tagalog as the primary language spoke at home. MST rarely encounters Korean and Tagalog LEP persons. MST’s Customer Service Representatives/Spanish-English Translators have no record of Korean or Tagalog LEP persons contacting the agency. Nonetheless, MST staff has begun to reach out to the Korean and Tagalog communities.

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

MST conducts a biennial onboard survey to determine who uses the service, how often it is used, and why passengers are riding the bus. The 2013 survey found that the largest group of respondents (25.5%) have been MST customers for less than a year, followed closely by those who have been customers for 3 to 5 years (22.6%), and those who have been customers for over 10 years (20.5%). Those have been customers for different lengths of time (one year, two years, five to ten years) or decline to state made up the remaining 31.4%.

The biennial survey includes a question on the frequency with which respondents rode a MST bus over the week prior to the survey. While the survey did not specifically call out LEP persons, a large portion of all MST passengers use the service frequently. The results showed:

1 to 2 times	19%
3 to 4 times	27%
5 or more times	45%
Not provided	9%

Another data source used to determine the frequency with which persons come in contact with MST's program is the U.S. census. The Census provides data for transportation used by workers 16 years of age or older. According to those who responded to the Census, approximately 2.1% of the Monterey County working population use public transportation as a means to commute to work. Unemployed persons, as well as those under 16 years of age, are not accounted for in this data.

<u>COMMUTING TO WORK</u>	<u>Number</u>	<u>Percent</u>
Workers 16 years and over	177,157	100%
Car, truck, or van -- drove alone	125,083	70.6%
Car, truck, or van -- carpooled	23,944	13.5%
Public transportation (excluding taxicab)	3,702	2.1%
Walked	5,677	3.2%
Other means	10,070	5.7%
Worked at home	8,681	4.9%

Source: 2008-2012 American Community Survey 5-Year Estimate, DP02 Selected Social Characteristics in the United States

The travel-to-work Census data was broken down further to identify LEP persons using public transportation to commute to work.

<u>COMMUTING TO WORK</u>	<u>Number</u>	<u>Percent</u>
Public transportation (excluding taxicab)	3,702	100.0%
Speak only English	1,600	43.2%
Speak Spanish:	1,828	
Speak English "very well"	376	10.2%
Speak English less than "very well"	1,452	39.2%
Speak other languages:	274	
Speak English "very well"	111	3.0%
Speak English less than "very well"	163	4.4%

Source: 2008-2012 American Community Survey 5-Year Estimate, B08113 Means of Transportation to Work by Language Spoken at Home and Ability to Speak English

Nearly half (43.6%) of the Census respondents using public transportation in Monterey County to commute to work report speaking English less than “very well.”

LEP persons frequently come in contact with MST services, which not only include physical operation of the bus, but also informational materials regarding routes, schedules, connections to other transit services outside the area, as well as trip planning assistance. Written materials and printed notices onboard are provided in both English and Spanish. While the MST Customer Service department does not track the number of customer interactions with LEP persons, all Customer Service Representatives are bilingual in Spanish.

MST’s Customer Service Representatives/Spanish-English Translators were interviewed about the frequency with which they come in contact with LEP persons that speak Korean and Tagalog. None of the Customer Service Representatives/Spanish-English Translators have encountered an LEP customer that spoke another language other than Spanish.

MST staff contacted Mr. Jonathan Saguil, a leader at the Filipino Community Organization of the Monterey Peninsula, in early 2014 to determine if there are LEP persons that use MST services. Mr. Saguil said that most Filipinos in his community group speak Tagalog and English, as English is a language that is taught in primary schools in the Philippines. Mr. Saguil was not aware of any difficulty his community members had in receiving information from MST in English. MST staff will remain in contact with this local Filipino community group and provide extra outreach as needed.

3. The nature and importance of the program, activity, or service provided by the program to people's lives

Transit service provided by Monterey-Salinas Transit is very important. Many people in Monterey County rely on public transportation for travel to work, school and medical appointments. The 2013 passenger survey indicates respondents use the service for work and/or job training, medical appointments, and other important purposes, and the main reasons identified for using MST services is because passengers are either unable to drive, do not have a car available or both.

<u>Trip Purpose</u>	<u>Count</u>	<u>Percent</u>
Work/Job Training	339	32%
School	225	21%
Shopping	195	18%
Healthcare/Social Services	109	10%
Visit Friends	119	11%
Other	86	8%
Total	1073	100%

Source: 2013 MST Onboard Passenger Survey Report; participants were allowed to select multiple responses

<u>Reason for using MST</u>	<u>Count</u>	<u>Percent</u>
No car available	563	40%
Reduce Traffic	63	5%
Avoid Traffic Congestion	70	5%
Cost of Parking	45	3%
Difficult Parking	25	2%
Don't Like to Drive	90	6%
Unable to Drive	243	17%
Cheaper than Driving	188	13%
Reduce Pollution	112	8%

Source: 2013 MST Onboard Passenger Survey Report; participants were allowed to select multiple responses

Other services provided by MST include trip planning. Rider's Guides, the MST website and MST staff all play a role in providing trip planning services. The onboard survey asked participants how they seek assistance with planning their trips. The resource most commonly used (35%) is the Rider's Guide, and nearly 30% of respondents used an MST employee for assistance with navigating from origin to destination. Google Translate, available on MST's website, was cited as assisting in trip planning for 15% of respondents. Because so many of MST's passengers rely on public transportation as their only means of travel, these trip planning services are important.

<u>Resources used for Trip Planning</u>	<u>Count</u>	<u>Percent</u>
Signage at Transit Centers/Bus Stops	161	14%
Rider's Guide	412	35%
Customer Service Phone Line	96	8%
Driver	219	19%
Google Translate	174	15%
Other	50	4%
Local Newspaper	50	4%
	1162	100%

Source: 2013 MST Onboard Passenger Survey Report; participants were allowed to select multiple responses

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

Information related to MST policy, safety and access are considered vital to the public. MST has identified a number of vital documents that are provided in both English and Spanish. The documents are identified below and copies are attached.

MST Vital Documents

POLICY	SAFETY	ACCESS
Notice to Beneficiaries	Safe Riding Tips	Customer Service Contact Information
Complaint Procedure	Notice of Security Cameras Onboard	Fare Structure
Complaint Form		Paratransit Information
Public Notices of Hearings		Paratransit Application
Public Notices of Service/ Fare Changes		Travel Training Program
Public Hearing Materials/Presentations		Taxi Voucher Program

MST is committed to making public information and customer services available to individuals who, as a result of national origin are limited in their English proficiency. MST customers have the option of getting information in more than one language.

- Written material (e.g., Rider's Guide and Public Notices) is printed in both English and Spanish. The cost of printed translation services varies by year depending on the number of publications printed. Publications are updated on different schedules. On average, MST spends \$2,000 to \$3,000 per year on translation services for publications.
- All MST Customer Service Representatives are bilingual and available to translate information into Spanish both over the telephone and in person at MST Customer Service windows.
- A bilingual Customer Service Representative is present at every public meeting in case translation services are needed. In 2013, there were over 6 public community workshops and ten board of directors meetings. Over \$500 was spent on staff time providing bilingual services at public meetings.
- MST's website includes Google Translate, which has capabilities of translating the website information into more than 50 languages.

MST contracts with Language Line Services to provide customers with an over-the-phone translation service, which has the potential to interpret information into more than 170 languages. The Language Line feature is available at all MST customer service centers and is identified by an Interpretation Services Sign in the center window. MST began using Language Line in 2010. This service costs \$110 monthly. This service was only used twice in 2013 when a MST Paratransit Transit Eligibility Specialist needed assistance translating information to a Spanish-speaking customer.

PLAN SUMMARY

MST has developed this Language Assistance Plan to help identify reasonable steps for providing language assistance to persons with Limited English Proficiency (LEP) who wish to access services provided by Monterey-Salinas Transit. 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.

An LEP Plan shall, at a minimum:

- a) Include the results of the Four Factor Analysis, including a description of the LEP population(s) served;
- b) Describe how the recipient provides language assistance services by language;
- c) Describe how the recipient provides notice to LEP persons about the availability of language assistance;
- d) Describe how the recipient monitors, evaluates and updates the language access plan; and
- e) Describe how the recipient trains employees to provide timely and reasonable language assistance to LEP populations

The Four Factor Analysis completed above identified LEP persons and the ways in which MST communicates with LEP persons. The following table summarizes MST's current and future efforts to provide language assistance to LEP persons.

Element	Strategy	Timeframe
Provide Oral Translation Services for LEP persons	<ul style="list-style-type: none"> • Employ Bilingual Customer Service Representatives/Spanish English Translators • Contract with Language Line to provide on-call translation service as needed 	<ul style="list-style-type: none"> • Continuous
Written Documents	<ul style="list-style-type: none"> • Provide Rider's Guides, paratransit applications, public notices, and other vital documents in English and Spanish 	<ul style="list-style-type: none"> • Continuous
Signage	<ul style="list-style-type: none"> • Standardize all signs onboard the bus to include English and Spanish • Use a symbol system that effectively conveys the message of each sign (e.g. no food on the bus) 	<ul style="list-style-type: none"> • Continuous
Website	<ul style="list-style-type: none"> • Provide transit services information on the website in Spanish • Use <i>Google Translate</i> or other online service to provide free translation into other languages 	<ul style="list-style-type: none"> • Continuous
Staff Training	<ul style="list-style-type: none"> • Employ Bilingual Customer Service Representatives/Spanish English Translators • Issue memo to all MST employees who interact with the general public on how to respond to LEP persons 	<ul style="list-style-type: none"> • Continuous • Memo to be issued within 3 months
Outreach	<ul style="list-style-type: none"> • Contact local community groups that represent the Korean and Tagalog speaking communities to identify ways to better communicate with those LEP persons. 	<ul style="list-style-type: none"> • Within 6 months

This LEP Plan shall be monitored and updated triennially. Updated census data will be examined as well as feedback from employees and local community groups to ensure that new language assistance needs are being addressed.

7. Membership of Decision-Making Bodies

The MST Board of Directors is entirely composed of elected officials from each city. Current members of the district are the Cities of Carmel, Del Rey Oaks, Gonzales, Greenfield, King City, Marina, Monterey, Pacific Grove, Salinas, Sand City, Seaside, Soledad and the County of Monterey. The city council from each city and the county board of supervisors appoints a person from their city to sit on MST's board of directors to represent the municipalities' interest in public transit. Those thirteen appointed elected officials make up the MST board of directors. The MST board of directors makes decisions regarding policy, service changes, fares, capital programming and facility locations.

There are two non-elected advisory bodies; the Mobility Advisory Committee (MAC) and a subcommittee of the MAC (ADAPT-R) that provide recommendations to MST staff and the MST board of directors. The MAC and ADAPT-R members are chosen by MST's board of directors. There are 11 members on the MAC and 4 members on the ADAPT-R. The table below presents the gender and ethnic composition of these non-elected advisory boards.

	Female	Male	White/ Caucasian- Not of Hispanic Origin	Black- Not of Hispanic Origin	Hispanic	Asian or Pacific Islander	American Indian or Alaskan Native
Mobility Advisory Committee	9	2	9	1	1	0	0
ADAPT-R Subcommittee	4	0	1	1	1	0	1

8. Sub-recipient Monitoring

MST does not allocate or pass through funding to sub-recipients; as such, there is no sub-recipient monitoring to report.

9. Equity Analysis of Site or Location of Facilities

In 2012 MST leaders completed plans for the agency's new consolidated headquarters, an environmentally friendly project that would bring maintenance, operations and administration facilities together on one site. It was slated to begin construction in late 2012, and the center was going to merge the current Thomas D. Albert Monterey and Clarence J. Wright Salinas facilities. In addition to housing a dispatch office, body shop, paint facilities, warehousing and driver training facilities, it would accommodate a 250-bus fleet. A customer service center and parking were also included in the plans. MST was working with the County of Monterey to develop the project on a 24.3-acre site on the former Fort Ord into the Monterey Bay Bus Operations and Maintenance Center. In early 2012 the Monterey County Board of Supervisors rescinded approval of the project and it will no longer be constructed as planned although the demand for an expanded facility remains.

In the upcoming years, MST will begin evaluating alternatives to a single consolidated maintenance, operations and administration facility. An equity analysis would be conducted during the planning stage of any off-site construction to ensure compliance with Title VI and Environmental Justice considerations.

10. Service Standards and Policies

Service Standards and Policies are required by FTA Circular 4702.1B (Title VI Requirements and Guidelines) for fixed route services, and are optional for demand response service. The standards and policies must address how services and amenities are distributed across the transit system and ensure that service design and operations practices do not result in discrimination on the basis of race, color, or national origin. Specific standards are required for the following indicators: 1) vehicle load, 2) vehicle headway, 3) on-time performance, and 4) service availability (a measure of how routes are distributed within the service area). Policies are required for the following service indicators: 1) distribution of transit amenities (including seating, shelters, printed and digital information, escalators, elevators, and waste receptacles) for each fixed-route mode operated, and 2) vehicle assignment for each fixed-route mode operated.

In addition to the Federal requirements for service allocation standards and policies, the Transportation Development Act in California mandates farebox recovery standards.

The successful delivery of transit service is based on two key components: density and demand.

- Density of land uses is one of the most important determinants of transit ridership. Population density is the number of people in a unit of area, such as a square mile or an acre, or more refined units for urban areas. Density can include both residents and employment within the area. The more people in a given area, the more will ride transit if it is available. Consequently, population density should be considered when determining appropriate service levels. In general, successful transit routes serve corridors with higher population density. The JAZZ service is an example of a route designed based on population density, including trip attractors and generators warranting more frequent levels of service.
- Demand is defined as the frequency with which riders use a particular transit service. Demand is often measured in the number of passenger boardings or passenger trips. In areas where population density may be less concentrated, transit demand can occur if there are trip generators or attractors that make transit attractive to the rider. MST's military routes are an example of demand-based services. Large numbers of individuals use the routes that serve the military installations at the beginning of shift times.

MST's service area includes both high and low density areas, and the demand for transit service varies significantly in the various communities in Monterey County. Due to resource constraints, if demand and/or population density in a corridor falls below one half of MST's service area average, service may not operate within the standards outlined below.

Quantitative Service Allocation Standards

Mode	Vehicle Load	On-Time Performance	Farebox Recovery
Fixed Route			20%
Local	1.25		
Primary	1.25		
Regional	1.25		
Commuter	1.0		
Military	1.25		
Trolley	1.25		
RIDES	1.0	75%	10%
Systemwide		75% on-time	15%

Service Availability

Fixed route bus service will serve 85% of the population within the urbanized areas within one quarter mile. The urbanized area is defined as having population densities of at least 7,996 persons per square mile.

Vehicle Headways

Local (Neighborhood Collector)

No headway standard. Services designed with input from community to be served. Periodically evaluate productivity of routes. If a route's productivity falls below the average on-call service productivity, MST would work with the community to develop corrective actions to improve, consolidate, or cancel the service.

Local Routes (as of Oct. 1, 2013)

Route	Weekday Peak / Off Peak Headways
3-CHOMP/Monterey	120/120
7-Del Rey Oaks/Monterey	Sat, Sun only
8-Ryan Ranch/Sand City	60/0
13-Ryan Ranch/Monterey	120/120
48-Salinas/Airport Business Center	60/60
91-Sand City/Pacific Meadows	2 trips per day
92-CHOMP/Pacific Meadows via Carmel	3 trips per day
93-Monterey/Pacific Meadows	Sat, Sun only
94-Sand City/Carmel Rancho	30/120
95-Williams Ranch-Northridge	120/120 (two-way circulator)
MST On Call Marina	General Public Dial-a-Ride
MST On Call Gonzales	General Public Dial-a-Ride
MST On Call Greenfield	General Public Dial-a-Ride
MST On Call King City	General Public Dial-a-Ride
MST On Call Soledad	General Public Dial-a-Ride

Primary & Regional

Standard is 60 minute frequency for the corridor all day. Vehicle headway is determined by ridership demand, population density, and major activity centers. Headways may be limited by available resources.

Primary & Regional Routes (as of Oct. 1, 2013)

Route	Weekday Peak / Off Peak Headways
1-Asilomar/Monterey	60/60
2- Monterey/Pacific Grove	60/90
11- Carmel/Sand City*	70/0
16- Monterey/Marina	60/60
24- Monterey/Carmel Valley Grapevine Express	30-60/60
27- Watsonville/Marina	120/120
41- Northridge/Salinas via East Alisal	30/30
43- South Salinas/Salinas	30/30
44- Northridge/Salinas via Westridge	75/75
45- Northridge/Salinas via East Market	75/75
49- Salinas/Santa Rita	60/60
JAZZ A- Aquarium/Sand City via Hilby	30/60
JAZZ B- Aquarium/Sand City via Broadway	30/60
JAZZ C- Aquarium/Sand City Express	30/0
20- Monterey/Salinas	30/30
21- Pebble Beach/Salinas Express*	3 am, 3 pm trips
23- Salinas/King City	60/90
28- Watsonville/Salinas via Castroville	120/120
29- Watsonville/Salinas via Prunedale	120/120

* These routes provide supplemental peak period trips on corridors served by other routes.

Military

Vehicle headway is determined primarily by ridership on the route and availability of dedicated resources. The goal is to recoup 75% of the fully allocated cost of service provision from outside funding sources. Schedule is focused on serving military base shift times. Service designed with input from military, which provides significant funding for these routes.

Military Routes (as of Oct. 1, 2013)

Route	Weekday Peak / Off Peak Headways
12- Monterey/The Dunes	7 trips per day
14- Monterey/NPS via La Mesa	60/120
56-Salinas–Monterey via Hwy 68	1 am, 1 pm trip
69- Presidio/Del Monte Center	30/30 (Fri eve, Sat, Sun only)
70- Presidio/La Mesa	2 am, 2 pm trips
71- Presidio/Marina Express	2 am, 1 pm trips
74- Presidio/Preston Park Express	2 am, 2 pm trips
75- Presidio/Marshall Park Express	30/120
76- Presidio/Stillwell Park Express	<30/<30
77- Presidio/Seaside	2 am, 1 pm trips
78- Presidio/Santa Cruz Express	1 am, 1 pm trip
82- Fort Hunter Liggett/Salinas Express	2 am, 2 pm trips
83- Fort Hunter Liggett/Paso Robles Express	2 am, 2 pm trips
Presidio Shuttle	5-15/5-15

Commuter

Commuter service headways will be determined by demand, and schedules are focused on transfers to and from connecting regional transportation services.

Commuter Routes (as of Oct. 1, 2013)

Route	Weekday Peak / Off Peak Headways
55-Monterey/San Jose Express**	3 trips per day

** Route serves as Amtrak Thru-Way bus, and is timed to meet Capital Corridor trains in San Jose. Funded in part by Amtrak and VTA.

Seasonal / CSUMB / Special Event

No frequency standard. Vehicle headway is determined primarily by demand, and schedules are focused on serving event or class start times. Service designed with input from university administration, funding sponsors, and/or event managers.

Seasonal / CSUMB / Supplemental / Special Event Routes (as of Oct. 1, 2013)

Route	Weekday Peak / Off Peak Headways
MST Trolley Monterey	10-12/10-12, summer only
17-CSUMB-Marina	60/60 (school year only)
22- Big Sur/Monterey	3 trips per day (weekdays in summer only; weekends all year)
25-CSUMB–Salinas	60/60 (school year only)
26-CSUMB–East Campus Express	30/30 (school year only)
36-Laguna Seca–Carmel	Special Event
37-Laguna Seca–Seaside	Special Event
38-Laguna Seca–Monterey	Special Event
39-Laguna Seca–Salinas	Special Event
47-Hartnell–Alisal Campus	60/60 (school year only)

11. Service Policies for Distribution of Transit Amenities

MST provides amenities to its passengers including bus stop signs, benches, shelters, waste receptacles, major transfer centers, and information including printed signs, system maps, route maps, schedules, and digital equipment. The following factors are considered in the determination of how bus stops are improved: passenger volume, transfer opportunities, access to major activity centers, site specific considerations, accessibility to persons with disabilities, safety, and availability of financial resources.

MST follows these general guidelines for specific amenities:

- New bus shelters and benches should be provided at stops where 25 passengers or more per day are expected to board buses (safety, space and resources permitting).
- Bus benches should be provided at stops where 10 passengers or more per day are expected to board buses, safety, space and resources permitting.
- Developments that should provide bus shelters and/or benches include shopping centers, office buildings, hospitals, schools, large apartment complexes, and major residential subdivisions. MST has prepared the “Designing for Transit” manual which describes transit-oriented design guidelines and specifications in Monterey County.
- Free-standing waste receptacles are installed based on the number of passenger boardings at a particular stop, the level of activity in the area, and the availability of other trash receptacles nearby. Installation of pole-mounted waste receptacles may additionally require identification of an adjacent property owner who agrees to regularly empty the receptacle. New waste receptacles should be located at or near stops where 25 passengers or more per day are expected to board buses, safety, space and resources permitting.
- Printed information, including system/route maps and schedule information, are provided at the transit centers and on all MST vehicles. In addition, a pole-mounted timetable is provided at bus stops located at major timepoints, as listed in the route’s published schedule. All bus stops in the MST system are identified by a standard MST bus stop sign.
- Provision of new digital information such as real-time transit information signage will be prioritized for Bus Rapid Transit corridors and major activity centers in the MST system, such as transit centers, transfer points for two or more routes, or bus stops where 50 or more passengers per day are expected to board buses.

Vehicle Assignments

New vehicles will be assigned in an equitable manner to provide efficient and effective transit throughout the communities MST serves.

Vehicles are distributed between the Monterey and Salinas divisions to reduce deadhead miles and are assigned according to the starting point of each route and the number of operator runs assigned to each division. All vehicles are maintained according to MST’s strict standards, regardless of the vehicle’s age.

Vehicle types and sizes, including emissions-reducing vehicles or smaller buses, are assigned based on the following criteria:

- Route Characteristics, such as ridership demand (e.g. high ridership routes may require high capacity, low floor vehicles that can be boarded quickly)
- Street Characteristics, such as narrow streets or intersections (e.g. smaller buses may be assigned to routes with tighter turning radii)

Performance Monitoring

MST will periodically review the performance of its routes and the distribution of its assets to assess adherence to its adopted standards and policies. A comprehensive evaluation will be conducted at least triennially, based on data collected for National Transit Database reporting. In addition to the triennial monitoring, MST will attempt to conduct the following monitoring activities:

- On-time performance and farebox recovery rates are reported to the Board of Directors on a monthly basis.
- Service availability, headways, and vehicle assignments will be evaluated during major service changes, comprehensive operational analyses, and other similar planning studies.

Based on the results of the performance monitoring, MST will prioritize its corrective actions for the lowest-performing routes and/or corridors.

12. List of Attachments

Notice to Beneficiaries

Complaint Procedures and Complaint Form

Onboard Survey Instrument

Public Hearing Policy

Public Hearing Presentations

Public Hearing Notices and Public Notices of Service and Fare Changes

Press Release

Safe Riding Tips

Notices of Security Cameras Onboard

Customer Service Contact Information

Fare Structure

Paratransit Information

Paratransit Application

Travel Training Program

Taxi Voucher Program

Limited English Proficiency (LEP) Policy