

City of Petaluma – Petaluma Transit

# TITLE VI Plan

October 2024

Attachments:

- A. Public Notice and Complaint Process
- B. Public Participation Plan
- C. Limited English Proficiency Plan
- D. Systemwide Standards and Policies
- E. Documentation of City Council Approval

City of Petaluma – Petaluma Transit  
Title VI Program  
October 2024

## **I. Introduction**

This program reflects the City of Petaluma Transit Division’s (“Petaluma Transit”) commitment to ensuring that no person 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 provided by Petaluma Transit, as protected by Title VI of the Civil Rights Act of 1964 (“Title VI”).

## **II. Title VI Complaint Procedures**

### ***Background***

The City of Petaluma has a file established for all Title VI complaints. This file is stored digitally at the transit facility at 555 N. McDowell Blvd, Petaluma, California 94954. The file is available for review by anyone making such a request. The City of Petaluma will investigate all complaints. A record of the investigation will accompany a copy of the original complaint in the file. Additionally, any notification of legal action and the results of any legal action will be filed with the original complaint.

### ***Procedure***

- Upon receipt of a complaint regarding a violation of civil rights, a scanned copy must be saved in a folder labeled with the name of the filer and the date; this folder shall be filed in the Title VI folder. The original must be submitted to the City of Petaluma’s Risk Manager for an investigation. Any additional correspondence from the filer should be handled in the same manner with a copy being filed with the copy of the claim in the title VI claim folder.
- Any correspondence from the Risk Management Department to the claimant pertaining to the claim should also be filed with a copy of the original claim.
- The Risk Manager will forward a copy of the claim to legal counsel.

## **III. Notice to Public of Rights under Title VI**

Attachment A shows the Petaluma Transit public notice, discrimination complaint process, and complaint form. This notice is posted on the Petaluma Transit website, Petaluma Transit customer center, and inside transit vehicles in English and Spanish.

## **IV. List of Title VI investigations, complaints, or lawsuits**

One Title VI complaint of bus driver discrimination was received by Petaluma Transit in March 2024. An agency investigation found no veracity of discrimination based upon the claim.

There are no other investigations, complaints, or lawsuits currently filed with Petaluma Transit.

**V. Public Participation Plan**

Attachment B is Petaluma Transit’s Public Participation Plan, which outlines the strategies for engaging the public in the process of transportation decisions. The plan is used to guide interaction with the community and encourage participation from traditionally disadvantaged populations, including the elderly, people with disabilities, minorities, non-English speaking persons, and low-income populations.

**VI. Limited English Proficiency Plan**

Petaluma Transit ensures that persons with Limited English Proficiency (LEP) shall not be discriminated against nor denied meaningful access to and participation in the programs and services provided by the agency. Attachment C contains an LEP plan that includes an assessment of current needs and language assistance strategies.

**VII. Ethnic Breakdown of Transit Advisory Committee**

<b>Race &amp; Ethnicity</b>		
	Population <sup>1</sup>	Transit Advisory Committee*
One race	86.6%	100%
Two or more races	13.3%	0%
White	68.1%	100%
Black or African American	1.4%	0%
American Indian and Alaska Native	1.2%	0%
Asian	4.8%	0%
Native Hawaiian and Other Pacific Islander	0.3%	0%
Some other race	10.9%	0%
Two or more races	13.3%	0%
<b>HISPANIC OR LATINO</b>		
Hispanic or Latino (of any race)	19.3%	17%
Not Hispanic or Latino	80.6%	83%

**\*2021 TAC data shown, will be updated as part of final 2024 Title VI plan**

<sup>1</sup> U.S. Census Bureau. (2022). PROFILE OF GENERAL POPULATION AND HOUSING CHARACTERISTICS. *Decennial Census, DEC Demographic Profile, Table DP1.*

Vacancies on the Transit Advisory Committee occur annually. Notices of vacancies on the Transit Advisory Committee are placed on all Petaluma Transit buses, advertised through social media, and are sent out to the City's general mailing list. When soliciting members of the public, Transit staff urges the city to encourage minority participation so that the committees reflect the diversity within the county. In addition, staff works via direct outreach to community-based entities in the area that serve minority groups to help encourage their members to consider applying for any committee vacancies. City Council selects committee members to represent the community's demographics to the greatest extent possible.

#### **VIII. Narrative Describing Subrecipient Monitoring**

The City of Petaluma has no FTA sub-recipients.

#### **IX. Determination of Site or Location of Facilities**

Petaluma Transit did not plan, site, or build any new facilities during the last term. There are no new facilities currently being designed.

#### **X. Systemwide Service Standards and Policies**

Attachment D contains Petaluma Transit's adopted systemwide service standards and policies.

#### **XI. Documentation of Council Approval**

Petaluma City Council approved this 2024 Title VI Plan on xxx xxx, 2024; Attachment E contains the City Council Resolution.

## **PUBLIC NOTICE**

### **TITLE VI OF THE 1964 CIVIL RIGHTS ACT**

“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.”

Petaluma Transit is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin as protected by Title VI of the Civil Rights Act of 1964 amended (“Title VI”). If you believe you have been subjected to discrimination under Title VI, you may file a written complaint with Petaluma Transit. The complaint must be filed no later than 180 calendar days of the alleged discriminatory incident. If you'd like more information about the Title VI program, you may contact the Title VI staff at the address or phone number below .

The preferred method is to file your complaint in writing using the Title VI Complaint Form, available in hard copy, PDF format, or as an online form, and sending it to:

Transit Manager  
Attn: Title VI  
Petaluma Transit  
555 N. McDowell Blvd  
Petaluma, CA 94954

Verbal complaints will also be accepted and transcribed by the Transit Manager. To make a verbal complaint or receive more information on Petaluma Transit’s Title VI Program, call (707) 778-4421.

Complaints may also be filed directly with the Federal Transit Administration by filing a complaint with:

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

If information is needed in another language, please call (707) 778-4421.

Si se necesita información en otro idioma, por favor llame al ( 707) 778-4421.

## **Petaluma Transit Title VI Complaint Process**

Petaluma Transit grants all citizens equal access to all its transportation services. It is further the intent of Petaluma Transit that all citizens are aware of their rights to such access. This site is designed to serve as an educational tool for citizens to understand one of the civil rights laws that protect their benefit of Petaluma Transit programs and services, specifically, as it relates to Title VI of the Civil Rights Act of 1964.

### **What is Title VI?**

Title VI is a section of the Civil Rights Act of 1964 requiring that “No person in the United States shall on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” Note that Title VI does not address gender discrimination. It only covers race, color, and national origin. Other Civil Rights laws prohibit gender discrimination.

### **Complaint Process**

#### **How do I file a complaint?**

Suppose you believe that you have received discriminatory treatment by Petaluma Transit on the basis of your race, color, or national origin. In that case, you have the right to file a complaint with the Transit Manager. The complaint must be filed no later than 180 calendar days of the alleged discriminatory incident.

#### **Methods of filing a complaint**

The preferred method is to file your complaint in writing using the Title VI Complaint Form, available in hard copy, PDF format, an email with the form attached, or as an online form, and sending it to:

Transit Manager  
Petaluma Transit  
555 N. McDowell Blvd  
Petaluma CA 94954

Completed forms can be submitted via email to: [transit@cityofpetaluma.org](mailto:transit@cityofpetaluma.org). Verbal complaints will also be accepted and transcribed by the Transit Manager. To make a verbal complaint, call (707) 778-4421.

You also have the right to file a complaint with an external entity such as the Department of Transportation (DOT), a federal or state agency, or a federal or state court.

Should a complaint be filed with Petaluma Transit and an external entity simultaneously, the external complaint shall supersede the Petaluma Transit complaint, and Petaluma Transit's complaint procedures will be suspended pending the external entity's findings.

### **Investigations**

Within ten working days of receipt of the formal complaint, the Transit Manager will notify the complainant and begin an investigation (unless the complaint is filed with an external entity first or simultaneously).

The investigation will address complaints against Petaluma Transit and Petaluma Paratransit employees and contractors. The investigation will be conducted in conjunction with and under the advice of The City of Petaluma's Risk Manager.

The investigation may include discussion(s) of the complaint with all affected parties to determine the problem. The complainant may be represented by an attorney or other representative of his/her choosing and may present testimony and evidence in the investigation.

The investigation will be conducted and completed within 60 days of the receipt of the formal complaint.

Based upon all the information received, an investigation report will be written for submittal to the Transit Manager.

The complainant will receive a letter stating the final decision of the Transit Manager by the end of the 60-day time limit.

The complainant shall be notified of his/her right to appeal the decision. Appeals may be made to the DOT.

### Title VI Complaint Form

Title VI of the 1964 Civil Rights Act requires 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.”

Note: The following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form, please let us know.

Complete and return this form via email to: [Transit@cityofpetaluma.org](mailto:Transit@cityofpetaluma.org) or via mail to:

Transit Manager  
Petaluma Transit  
555 N. McDowell Blvd  
Petaluma CA 94954

1. Complainant’s Name \_\_\_\_\_

2. Address \_\_\_\_\_

3. City, State and Zip Code \_\_\_\_\_

4. Telephone Number (home) \_\_\_\_\_ (business) \_\_\_\_\_

5. Email \_\_\_\_\_

6. Person discriminated against (if someone other than the complainant)

Name \_\_\_\_\_

Address \_\_\_\_\_

City, State and Zip Code \_\_\_\_\_

7. Which of the following best describes the reason you believe the discrimination took place? Was it because of your:

a. Race \_\_\_\_\_

b. Color \_\_\_\_\_

c. National Origin \_\_\_\_\_

8. What date and time did the alleged discrimination take place?

\_\_\_\_\_



# City of Petaluma – Petaluma Transit

## Public Participation Plan

### I. Introduction

The City of Petaluma provides fixed-route transit and paratransit services through Petaluma Transit, a division of the Department of Public Works & Utilities. Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origins in programs and activities receiving federal financial assistance. Under federal regulations, transit operators must take reasonable steps to ensure persons have access to their activities and programs.

This Public Participation Plan is used to inform the community of available services and to encourage participation from traditionally disadvantaged populations, including the elderly, people with disabilities, minorities, non-English speaking persons, and low-income populations. The Plan includes a summary profile of the City of Petaluma and a description of the public participation strategies undertaken by Petaluma Transit.

### II. Community Profile

The following summary of the City of Petaluma’s geography, social characteristics, and economic characteristics establishes a context for this Public Participation Plan. All social and economic characteristics are derived from the American Community Survey 2015-2019 5-year Estimates unless otherwise noted.

#### *Geography*

The City of Petaluma, which is also the Petaluma Transit Service area, covers approximately 14.4 square miles of land. There are 1,617 housing units and 4,220 residents per square mile. California Highway 101 and Washington Street divide the City into quadrants. The Petaluma River runs through the historic downtown on the west side of the City. The east side of the City contains newer neighborhoods and retail centers. There are two Petaluma Transit Transfer Centers located on either side of Highway 101, the Copeland Street Transit Mall (west) and the Eastside Transit Center (east).

#### *Social & Economic Characteristics<sup>1</sup>*

##### Population & Age

Population	59,776	
Age 0-17	11,658	19.5%

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<sup>1</sup> U.S. Census Bureau. (2022). AMERICAN COMMUNITY SURVEY (ACS) 5-year estimates

Age 18-65	36,438	61.0%
Age 65+	11,680	19.5%
Median Age	43.5	

**Race & Ethnicity**

<b>Total population</b>	<b>59,776</b>	
	<b>Total</b>	<b>Percentage</b>
<b>One race</b>	<b>51,776</b>	<b>86.6%</b>
White	40,717	68.1%
Black or African American	836	1.4%
American Indian and Alaska Native	747	1.2%
Asian	2,857	4.8%
Native Hawaiian and Other Pacific Islander	165	.3%
Some other race	6,509	10.9%
<b>Two or more races</b>	<b>7,945</b>	<b>13.3%</b>
White and Black or African American	361	4.5%
White and American Indian and Alaska Native	913	1.6%
White and Asian	1,269	2.1%
Black or African American and American Indian and Alaska Native	37	<.01%
<b>Hispanic Or Latino</b>		
Hispanic or Latino (of any race)	11,530	19.3%
Not Hispanic or Latino	48,152	80.6%

**Education – Population 25 years and older (44,264)**

Less than High School Graduate	3,361	7.6%
High school graduate (includes equivalency)	7,208	16.3%
Some college or associate’s Degree	14,681	33.2%
Bachelor's degree	12,116	27.4%
Graduate or professional degree	6,898	15.6%

**Veteran Status**

Civilian Veterans	2,800	5.8% <sup>2</sup>
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**Disability Status**

Total with any disability	6,229	10.5% of the population
With a hearing difficulty	1,563	2.6%
With a vision difficulty	787	1.3%
With a Cognitive difficulty	2,166	3.7%
With a ambulatory difficulty	2,948	5.0%
With a self-care difficulty	1,000	1.7%
With a independent living difficulty	2,001	3.0%

**Language – Population 5 years and older (56,982)**

English only	45,703	
Language other than English	11,279	24.7%
Spanish	7,819	17.1%
Other Indo-European languages	1,531	3.3%
Asian and Pacific Islander languages	1,633	3.6%
Other languages	296	.6%

**Economic Characteristics**

Median household income	\$82,366
Average household income	\$102,655
Living in poverty (people)	6.7%

**III. Public Participation Strategies**

Petaluma Transit ensures equal access to its programs and services and promotes inclusivity undertaking the following:

- Public meetings that are held in the evenings and at a central, transit-accessible location to allow for maximum attendance and at varying times throughout the day to accommodate different work schedules.
- Transit Advisory Committee meetings that are televised on the local Community Access station and available to view online live or via archive.
- Coordination and partnership with community organizations.
- Bilingual outreach at transit centers prior to fare and service changes.

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<sup>2</sup> of Civilian population 18 years and over

- Outreach to schools.
- Events at the Petaluma Senior Center.
- Events at senior housing facilities.
- Transit maps tailored to each of the four primary public middle and high schools are distributed in print and posted online in English and Spanish.
- Periodic focus groups that are conducted at the schools and junior college.
- Third-party translation services that are available in real-time for phone conversations during business hours (contracted service).
- Bilingual advertising on buses about opportunities to participate with Petaluma Transit.
- Email notices of opportunities to participate with Petaluma Transit that are sent to the City’s general mailing list.
- Paratransit application materials and forms that are available in English and Spanish
- Videos on how to ride the bus that are posted online.
- Rider guides for bus and paratransit that are provided in large print.
- Website content that is provided in multiple languages, including Spanish.
- Title VI Plan that is provided on the website in English and Spanish.
- Outreach that is conducted at transit centers during busy times of day to make participation easier for the most possible riders.
- Social media, including Facebook, that is used to notify riders of changes or delays.

The following table describes Petaluma Transit’s deployment of outreach and participation strategies for ongoing and project-related activities. The table also highlights strategies that are specifically targeted to reach Spanish-speaking residents, in addition to the language assistance measures outlined in the Limited English Proficiency Plan (See Attachment C).

Participation		Status	When Used
1	Project Open Houses, Workshops, and Community Meetings	Petaluma Transit schedules public meetings. Collaborates with community-based organizations, social service providers, and/or faith-based groups.	Planning Studies, Service Proposals, Major Service Changes
2	Website Support	Trip planning information, public notices, fare information, English and Spanish language assistance available at <a href="http://transit.cityofpetaluma.net">transit.cityofpetaluma.net</a> . Ability to view Web content translated into Spanish	Passenger Information, Service Changes, Participation Opportunities
3	Media Relations and Non-English Speaking Residents	Petaluma Transit publishes announcements in Spanish Language newspapers and utilizes communication channels from partner organizations.	Planning Studies, Service Proposals, Title VI Outreach

4	Community Events	Petaluma Transit has a calendar of public events that it participates in as sponsors, specific projects, or ongoing activities.	For ongoing outreach, to solicit input and educate on transit options
5	Community Organizations	Petaluma Transit partners with a variety of community, advocacy, and social service organizations to conduct outreach.	Ongoing coordination; Assistance on outreach to specific populations and communities
6	Flexible Public Participation Opportunities	Decisions are made in collaboration with community-based organizations	For ongoing input and feedback on specific projects or service change proposals.
7	Identifying affected populations with limited English proficiency (LEP)	Ongoing implementation as described in the Petaluma Transit Language Assistance Plan.	To understand communication needs and tailor information and services.
8	Translation Assistance	Customer assistance and translation from Petaluma Transit’s primary service provider is available in 150+ languages.	For customer service and information provided by phone and in person.
9	Multilingual Information Materials	It is used to reach target populations speaking Spanish.	Schedule & Passenger Information, Service Updates, Planning Studies, Service Change Proposals, Major Service Changes
10	Street Level & On the Bus Direct Communication	Street-level outreach informs customers, residents, and businesses of ongoing activities and directly engages the public— all messaging is presented in English and Spanish.	Surveys, Service Updates, Planning Studies, Service Change Proposals, Major Service Changes
11	Social Media	Petaluma Transit shares information via videos and social media posts.	Ongoing communications Advertise activities and meetings Solicit input
12	Community Advisory Groups	Used as appropriate for projects & studies, including needs assessment (e.g., Transit Advisory Committee, Transit-Paratransit Coordinating Committee)	Planning Studies, Transit Needs Assessments, Input on Design and Delivery of Services & Programs for Seniors and Disabled Residents
13	Public Notices and Legal Notices	Petaluma Transit publishes and distributes all public and legal notices in English and Spanish.	Public Meetings, Public Hearings, Service Change Notices
14	Email Communications	Petaluma Transit maintains and augments email lists for specific	Updates on activities Advertise meetings Specific Project or

		projects and overall notifications and announcements	Service-related changes or updates
15	City of Petaluma City Council Meetings (Petaluma Transit Board of Directors)	City Council meetings are generally held on the first and third Monday of the month. Language assistance is available on request with 48 hours advance notice.	Board has regularly scheduled meetings open to the public throughout the year. Public hearings are typically held during regular meetings.
16	Travel Training	Travel Training is offered by our travel trainer, by request. Translation services can also be provided at travel trainings as needed.	Scheduled throughout the year and conducted across Petaluma in partnership with community centers, social service organizations, churches, and senior facilities.
17	Metropolitan Transportation Commission’s Public Participation Plan	For additional outreach and participation in regional planning, Metropolitan Transportation Commission (MTC) maintains a regional Public Participation Plan.	For regional plan updates & surveys, studies, and projects affecting Sonoma County

The methods and strategies outlined in the table are described in more detail below, with a section dedicated to each, in addition to these public participation strategies.

**Project Open Houses, Workshops, and Community Meetings**

Publicly noticed project open houses and community meetings provide stakeholders with the most current information in an interactive setting. These may consist of brief presentations with brainstorming discussions, full project or service proposal reviews, or small informational sessions. Workshops solicit input from the community early in the planning phases of any potential change and at key decision points. Workshops may use exercises or breakout groups to generate ideas and feedback. Public forums provide the community with an opportunity to hold a community discussion on proposed and planned changes. Petaluma Transit compiles any comment cards, meeting notes, and written statements to document public input and present to the Transit Advisory Committee. Staff provides information to participants on upcoming public meetings, resources on the Petaluma Transit website, and how to contact the project manager. Petaluma Transit works with community partners to leverage already scheduled meetings in low-income, minority, and LEP communities to integrate public participation efforts into existing community and neighborhood activities. Comments are accepted in English and Spanish. Translators are made available at meetings when possible.

Petaluma Transit’s public meetings are held at locations that are transit and Americans with Disabilities Act (ADA) accessible, and they may be scheduled at various times of the day and on Saturdays to accommodate working families, individuals, and seniors. Petaluma Transit staff will continue to work with community-based organizations and other partners when scheduling these

events to meet the needs of particular communities. Convenient and accessible locations, facilities, and meeting times maximize opportunities to provide input.

### **Website Support**

Petaluma Transit provides project updates and information on how to provide input on its website, [transit.cityofpetaluma.net](http://transit.cityofpetaluma.net). The general public learns about the purpose of the project, the communities it will serve, project timeframes, and community engagement. Petaluma Transit will dedicate web pages for service changes, with links to electronic files of printed materials, updating current material to reflect service changes, and calendars of upcoming participation events, public forums, and workshops. Links may also be provided in various organizations' e-newsletters. Information includes tables that list changes, new route maps, a travel planner, information regarding service changes on the pages of the affected routes, a rider alert at the top of the home page, and contact information to reach Petaluma Transit staff.

Petaluma Transit's website provides access to detailed information on services and programs, service updates, its Short Range Transit Plan, ongoing activities, completed projects, and will have a link to the Transit Advisory Committee's agendas and packets. Petaluma Transit's website supports feedback and comments, interactive maps, trip planning, and real-time transit information. Web activities may include reaching out to Petaluma organizations and requests to have Petaluma Transit web page links on their websites. Google Translate allows visitors to instantly translate the website content into over a dozen languages, including Spanish.

### **Media Relations and Non-English Speaking Residents**

Press Releases and media events disseminate information and accomplishments to local, national, and trade media outlets. Petaluma Transit uses various available resources, including media contact lists, websites, and social media, to communicate with the general public. The media strategy incorporates written press releases, interviews, events. These are tools that will be utilized where appropriate and as circumstances and resources allow.

### **Community Events**

Petaluma Transit staff participate in community events throughout the City to establish a presence, promote programs, and interact with residents. Outreach includes information tables at public events, environmental forums, community open houses throughout the City, community health and wellness events, farmers markets, or low-income housing and job fairs. At these events, Petaluma Transit staff and community organization partners provide information on Petaluma Transit services and programs, answer questions, assist with trip planning, and obtain input from riders and the public.

### **Community Organizations**

Petaluma Transit staff identifies and engages with individuals, institutions, community, and faith-based organizations with low-income, minority and/or LEP constituents to ensure they understand program and service proposals and listen and respond to their concerns. Petaluma Transit has established relationships with Petaluma People's Service Center, Petaluma's Family

Resource Center, PEP Housing, and COTS among others, to organize and conduct outreach activities and community meetings to discuss services and programs.

### **Flexible Public Participation Opportunities**

Petaluma Transit staff varies the size and format of meetings depending on the community's needs. A community meeting with the local member of the Board of Directors, for example, will differ in size and format from a gathering of a neighborhood group in the impacted area. Communications announcing public participation opportunities are tailored to reach a particular community or affected population.

Where appropriate, Petaluma Transit distributes surveys to solicit input from the public via the Petaluma Transit website, mailed out, web-based, given out at bus stops and on-board buses, or administered by staff. Comment forms solicit input from the public in addition to or in place of conducting surveys. These forms can be distributed in various ways, including stocking them on buses, at transit centers, at community centers, and having them seat-dropped on vehicles. Staff may also distribute them in person at community events, on buses, and at bus stops. Signage in English and Spanish is located on all public vehicles with instructions on how to provide feedback to the Agency.

A phone line is provided for passengers to ask questions about proposed service changes or for scheduled service changes before and after those changes occur. Phone contact is also a method for obtaining feedback regarding service changes. Petaluma Transit coordinates with partners, community organizations, and stakeholders to make the phone number available to current and potential riders.

### **Translation Assistance**

As appropriate, Petaluma Transit will host community meetings with translation assistance provided by bilingual Petaluma Transit staff, external translators, or community members. Comment cards are supplied, and staff follow-up on commentators' specific requests and complaints through investigation and additional discussions. In-person language assistance in Spanish is available at Petaluma Transit's offices or via telephone. Petaluma Transit provides bilingual phone support in English and Spanish (and 150+ additional language via real-time phone translation services – contracted service)

### **Multilingual Information Materials**

Petaluma Transit develops and publishes schedules, information sheets, and brochures in Spanish and English in addition to public information materials on current and upcoming projects. Materials can include fact sheets, Frequently Asked Questions, and flyers. These may be updated based on feedback and questions from the general public. As appropriate, materials are translated and posted on [transit.cityofpetaluma.net](http://transit.cityofpetaluma.net) and disseminated at public events and distributed via postings inside transit vehicles, major transfer locations, and shelters. Information is also distributed by email blast to community outreach partners, stakeholders, and interested individuals. Depending on the document, the project scope, and the potential impact on LEP populations, materials may be translated into other languages as required.

**Presentations and Visual Aids**

Petaluma Transit project staff will use various illustrative visual aids as appropriate and as circumstances allow to support effective communications with the public. These may include drawings, charts, graphs, photos, maps, and how to access trip planning and real-time information on the internet. Staff often uses PowerPoint presentations at community meetings, which are translated as needed.

**Street Level and On Board the Bus Outreach**

Petaluma Transit customers and Petaluma City residents may have no interest or ability to participate in a meeting or review information on a website; therefore, street-level outreach attempts to capture the opinions and needs of these stakeholders. This includes knowledgeable Petaluma Transit staff and community outreach ambassadors engaging in conversations, providing information, and recording comments. For specific study areas, project staff may engage residents, businesses, and customers that live and conduct business along the route to inform, administering surveys, build support and address concerns or ideas. This includes getting on the agenda of local neighborhood meetings, which offers an additional opportunity to invite participation in ongoing outreach efforts. This form of outreach can be particularly effective for reaching those that are not likely to read printed material or use the Petaluma Transit website. The scale of in-person activities will be conducted based on the specific project or activity requirements, the availability of staff or community partners, or if there are significant service changes planned.

**Social Media**

Petaluma Transit will attempt to reach out to those who cannot attend or do not regularly participate in formal public meetings and board hearings. Through its annual outreach and marketing activities, the Agency is preparing to bolster its social media presence through Facebook and Twitter to encourage participation. For those who can participate in person, an online and social media presence provides two-way communication between meetings, strengthens the dialogue, and supports a transparent planning process.

**Community Advisory Groups**

Petaluma Transit develops project-based community advisory groups that provide input and feedback as a project or study is designed and implemented through consultation with stakeholders. Groups consist of stakeholders and members of various communities, organizations, backgrounds, and interests that provide input to the Transit Agency on specific programs or projects. Petaluma Transit has benefited from working with community advisory groups in the development of transit needs assessments. The District strives to schedule group meetings during times and in locations that maximize stakeholder participation.

**Public Notices and Legal Notices**

In addition to information materials, Petaluma Transit staff may use other forms of public advertisement to notify the public of important project or service-related information on bus

shelters, at bus stops, inside or outside transit vehicles) as well as in English and Spanish newspapers in general circulation. Petaluma Transit will post rider information signage on its vehicles based on the needs of the outreach campaign and those affected. Signage is available in both English and Spanish.

### **Community-Based Organizations and Contractor Outreach**

Outreach to contractors and community-based organizations regarding Petaluma Transit's Disadvantaged Business Enterprise (DBE) programs provides information about opportunities to bid and compete for upcoming contracts. Petaluma Transit collaborates with DBE officers in transit agencies across the Bay Area as members of the Business Outreach Committee (BOC) to develop and stage four outreach and educational events each year. Events and workshops are in addition to the BOC's quarterly newsletter and announcements of upcoming contract opportunities. These outreach events inform the contracting community of upcoming bid packages, assist small contractors in developing relationships with prime contractors, and examine ways to increase diversity in workforce participation.

### **Email Communication**

Project-specific email blasts facilitate communication and feedback from the public. Email blasts may be used to communicate with community-based organizations, stakeholders, advocacy groups, merchants' organizations, neighborhood groups, and other interested individuals. In addition, the City of Petaluma sends out email newsletter blasts to the community multiple times per week, which also include topical Transit information as needed.

Petaluma Transit also maintains a general email list consisting of those who have indicated they wish to be notified of general Petaluma Transit news and outreach activities. The public can notify Petaluma Transit of their interest via the [transit.cityofpetaluma.net](http://transit.cityofpetaluma.net) Web site, by phone, in person, by mail, and at meetings.

### **Board of Directors' Meetings**

Agendas are available 72 hours before the Board meetings. Board meetings that involve fare and service changes are advertised on a broader scale. Meeting times are communicated via bilingual notices posted in transit vehicles, shelters, and major transfer hubs. Radio ads and media placements in English and Spanish language newspapers are utilized to allow appropriate and as resources. All Petaluma Transit Board meetings have a public comment period, and translators are available on 72-hour request. Meetings are held at Petaluma City Hall, which is accessible by transit. Petaluma Transit Board meetings are streamed on the internet and archived on the City's website <http://cityofpetaluma.net/cclerk/archives.html>. Board agendas, staff reports, and meetings minutes are also available at <http://cityofpetaluma.net/cclerk/archives.html>.

All Board meeting agendas include the following notice:

*In accordance with the Americans with Disabilities Act, if you require special assistance to participate in this meeting, please contact the City Clerk's Office at (707) 778-4360 (voice) or (707) 778-4480 (TDD). Translators, American Sign Language interpreters, and/or*

*assistive listening devices for individuals with hearing disabilities will be available upon request. A minimum of 48 hours is needed to ensure the availability of translation services. In consideration of those with multiple chemical sensitivities or other environmental illness, it is requested that you refrain from wearing scented products. The City Clerk hereby certifies that this agenda has been posted in accordance with the requirements of the Government Code.*

*In accordance with Government Code §54957.5, any materials of public record relating to an agenda item for a regular meeting of the Transit Advisory Committee that are provided to a majority of the members less than 72 hours before the meeting will be made available at the City Clerk's Office, 11 English Street, during normal business hours. Materials of public record that are distributed during the meeting shall be made available for public inspection at the meeting if prepared by the City or a member of its legislative/advisory body, or the next business day after the meeting if prepared by some other person.*

*For accessible meeting information, please call (707) 778-4360 or TDD (707) 778-4480. Agendas and supporting documents can be found at:  
<http://cityofpetaluma.net/cclerk/archives.html>.*

### **Passenger Advisory Groups**

The Petaluma Transit Advisory Committee serves as the Agency Passenger Advisory Committee and fulfills other transit-related duties/functions in addition to working with community advisory groups. Subcommittees and Ad-hoc committees can be formed from this group at any time to address more specific passenger-related topics as needed.

### **Mobility Management Travel Training Programs**

Petaluma Transit's travel training consists of training for senior, disabled, and low-income residents (also in Spanish) on using the fixed route bus system and navigating paratransit & mobility alternatives. As part of the Petaluma's Travel Training Program, training is provided via group presentations and question and answer sessions on all the different transportation options available to them in Petaluma, as well as "travel tours" with a guide in which small groups (3-5 people) experience riding the public bus first-hand.

### **Metropolitan Transportation Commission (MTC) / Public Participation Plan**

The MTC plan details a comprehensive outreach program that includes outreach to minority and low-income communities throughout the region. Components of the plan include telephone surveys and focus groups representing the demographic composition of individual Bay Area communities. MTC conducts limited outreach to community-based organizations in minority/low-income areas and provides grants throughout the region to help fund outreach activities, recruitment efforts for meeting participation, and meet language assistance needs via translators and production of multilingual documents. Petaluma Transit is included as part of MTC's regional working group collaborating to address Title VI guidance on public outreach and participation strategies. For more information, and to view MTC's Title VI Plan, see:

<https://mtc.ca.gov/about-mtc/access-everyone/civil-rights-act-file-complaint>.



#### IV. Summary of Past Public Outreach

Petaluma Transit has promoted equal access to its programs and services and inclusive participation over the past three years through the following strategies:

- Implementation of the language assistance measures outlined in the Limited English Proficiency Plan (See Attachment C).
- Participated in community events (Butter and Eggs Parade in May – annually).
- Participated in the annuale goal setting meetings for the City of Petaluma. Spanish Translators were provided at all meetings.
- All Transit Advisory Committee meetings were televised on the local Community Access station and are also available for viewing online live or via archive.
- Coordination and partnership with community organizations.
- Worked closely with the City School District to provide transit information in both English and Spanish.
- Provided school travel training sessions with youth (8-18 years old) on school campus during orientation periods annually
- Provided travel training/mobility options events at the Petaluma Senior Center.
- Provided travel training/mobility options events at various senior housing facilities.
- Transit maps tailored to each of the four public middle and high schools were distributed in print and posted online in English and Spanish.
- Periodic focus groups were conducted at the schools and junior college.
- Bilingual advertisement on buses about opportunities to participate with Petaluma Transit.
- Emailed notice of opportunities to participate with Petaluma Transit are sent to the City’s general mailing list.
- Videos on how to ride the bus were posted online.
- Rider guides for bus and paratransit are provided in large print.
- Website content is provided in multiple languages including Spanish.
- Title VI Plan provided on the website in English and Spanish.
- Americans with Disabilities act and reusable accommodations request information was made available online.
- Outreach conducted at transit centers during busy times of day to make participation easier for the most possible riders.
- Social media, including Facebook, used to notify riders of changes or delays.
- All rider alerts are in both English & Spanish
- Rider Guide & Paratransit Guide available in English and Spanish
- All bus schedules at shelters are in both English and Spanish
- Worked closely with agencies that provide services to low income and/or persons with disabilities to provide bus passes and travel training.

## Petaluma Transit – City of Petaluma

# Limited English Proficiency (LEP) Plan

### **I. Introduction**

The City of Petaluma provides fixed-route transit and paratransit services through Petaluma Transit, a Public Works & Utilities Department division. Limited English proficiency (LEP) is defined by the limited ability to read, write, speak, or understand English. Petaluma Transit ensures that persons with Limited English proficiency shall not be discriminated against nor denied meaningful access to and participation in the programs and services provided by the division at no additional cost.

This Limited English Proficiency Plan describes Petaluma Transit’s strategy for providing language assistance for LEP populations. The plan includes a needs assessment based on a four-factor analysis, language assistance measures, a staff training plan, ongoing maintenance measures, and notification methods.

### **II. Four Factor Analysis**

The following analysis is used to determine the appropriate language services provided to ensure meaningful access to Petaluma Transit programs and activities.

#### ***Factor 1: Number and proportion of LEP persons served or encountered***

Petaluma used the American Community Survey (ACS) 5-Year survey data for 2022 for Limited English Proficient (LEP) Populations in the City of Petaluma to estimate the number or proportion of LEP persons who might use or want to use Petaluma Transit’s services. The American Community Survey (ACS) 5-Year survey data identifies people who speak English “less than very well” as Limited English Proficient persons.

Of the population aged five years and older in the City of Petaluma, 17.17% (7,819) identified Spanish as their primary language. The following table shows the population broken down by the identified primary language spoken for petaluma residents.

**Language – Population 5 years and older (56,982)**

English only	45,703	
Language other than English	11,279	24.7%
Spanish	7,819	17.1%
Other Indo-European languages	1,531	3.3%
Asian and Pacific Islander languages	1,633	3.6%
Other languages	296	.6%

***Factor 2: Frequency of LEP populations’ contact with existing programs, activities, and services***

Petaluma Transit conducted an onboard bilingual survey (English and Spanish) in 2016. Of the total amount received, only 9.2% were completed in Spanish (28 out of 303). This is a slight increase from 8.1% in 2014, and down from 11.6% in 2012, and 15.7% in 2010. Among registered paratransit riders, 1.5% indicate a language other than English as their primary language. A 2018 survey conducted by the MTC had 4.2% of surveys completed in Spanish.

***Factor 3: Importance to LEP populations of programs, activities, and services***

Petaluma Transit considers public transit to be an essential service for many residents, commuters, and visitors. The majority of onboard survey respondents who answered in Spanish reported a family income of less than \$40,000 per year. The American Community Survey estimated that 12% of Petaluma residents who commute to work on public transportation speak Spanish or have limited English proficiency.

***Factor 4: Resources available to Petaluma Transit and overall cost to provide LEP assistance***

Petaluma Transit makes a reasonable effort to communicate with LEP persons about available transit services, including bi-lingual staffing of multiple positions. The Petaluma Transit staff works to improve transit for Spanish speaking residents through targeted outreach strategies, translation of vital documents, and travel training (with translation services available as needed). Bilingual staff includes employees Spanish language bus drivers, street supervisors, and operations dispatchers who can help Spanish-speaking persons over the phone or in-person with Transit or Paratransit related questions. Translation assistance is included in a number of outreach and customer service tasks, including through bilingual staff whose salaries are included in personnel budgets.

### III. Language Assistance Measures

The percentage of Spanish-speaking LEP persons in the Petaluma Transit service area meets the Safe Harbor threshold by constituting at least 5% of the total population. This means that Petaluma Transit must provide written translation of vital documents in Spanish in order to comply with the Safe Harbor provision, as adopted by the Federal Department of Transportation. Petaluma Transit meets and exceeds this requirement by providing an array of assistance measures for Spanish-speaking LEP persons. No other languages eligible to be served or likely to be affected or encountered were found to exceed 5% of the total population.

Current language assistance measures to address the needs of LEP persons include the following:

- Permanent Staff position for bilingual dispatcher (contractor position):
  - Answers incoming phone calls in Spanish
  - Responds to customer service inquiries and booking paratransit trips in Spanish
  - Provides oral translation of all documents in Spanish
  - Real-time phone translation assistance in 150+ languages (contracted)
- Transit Specialist:
  - Fosters ongoing relationships with Latino community leaders and community groups, including LEP advocacy groups
  - Attends community events
  - Staffs Petaluma outreach events about fare and service changes
  - Provides travel training with Spanish translation available as needed
  - Translates key documents to Spanish
- The following critical written materials are translated to Spanish:
  - System map
  - School-specific transit maps for all public high and middle schools
  - System advisories
  - Website content
  - Title VI Public Notice – print and web
- ADA Paratransit services and materials available in any language:
  - Telephone customer service
  - Eligibility Applications
  - In-person evaluations as needed
  - Paratransit Rider’s Guide
- Advertisements in local Spanish-language newspaper announcing fare and service changes
- Website postings informing users of available LEP assistance provided in Spanish and in additional languages via Google Translate
- Onboard written notices are provided in Spanish

- Pictography included on fareboxes to indicate proper fare payment procedures without need for written language comprehension.
- Coordination of oral and written translation services for languages other than English.

#### **IV. Methods for Notifying LEP Persons About Available Language Assistance**

Petaluma Transit will notify LEP persons of available language assistance services through the following methods:

- Written notices in Spanish and English onboard transit vehicles
- Written notices in Spanish and English on display in the transit customer service office
- Notice in Spanish and English on the website
- Including contact information for translation requests on key printed documents
- Posting of bilingual fliers at community centers, libraries, and transit centers
- Participation in local community events.

#### **V. Methods for Monitoring, Evaluating, and Updating Plan**

Petaluma Transit will review this plan annually, including:

- Assessing sufficiency of staff training and budget for language assistance
- Reviewing current sources for assistance to ensure continuing availability
- Reviewing and complaints, comments, and suggestions related to LEP assistance

#### **VI. Staff Training Plan**

Petaluma Transit will ensure effective implementation of this plan by scheduling annual training for existing staff and including effective LEP assistance strategies in orientation training for new staff that regularly interact with the public. Training will include a review of this plan and how to handle verbal requests for service or information in a language other than English. Annual refresher trainings are provided to bus operators.

**I. Systemwide Service Standards and Policies**

**Vehicle Load Standards**

Mode	Average Passenger Capacities				
	Seated	Standing	Total	Max Load Factor - Peak	Max Load Factor - Off-Peak
<b>Regular Routes</b>					
30' Gillig LF	23	19	42	42/23	42/23
35' Gillig LF	34	28	62	62/34	62/34
40' New Flyer LF	38	31	69	69/38	69/38
40' Gillig LF	40	32	72	72/40	72/40
<b>Trippler Routes</b>					
30' n/a				n/a	n/a
35' Gillig	34	28	62	62/34	62/34
40' New Flyer LF	38	31	69	69/38	69/38

**Vehicle Headways Standards**

Mode	Peak	Base	Evening
<b>Weekday</b>			
Regular Routes	30-60 minutes	30-60 minutes	30-60 minutes
Trippler Routes	n/a	n/a	n/a
<b>Saturday</b>			
Regular Routes	60 minutes	60 minutes	60 minutes
<b>Sunday</b>			
Regular Routes	60 minutes	60 minutes	60 minutes

**On-Time Vehicle Performance Standards**

A vehicle is considered on time if it departs a scheduled time-point no more than 1 minute early and no more than 5 minutes late. Petaluma Transit’s on-time performance objective is 90%.

**Service Availability Standards**

Petaluma Transit bus stops are spaced between ¼ to ½ mile apart; on average will not be more than four blocks apart.

**Vehicle Assignment Policy**

**BUS ASSIGNMENTS BY SIZE FOR TRANSIT**

	SIZE	30'	35'	40'	MILEAGE (in Ks)
ROUTE	2/11	2ND	1ST	3RD	152
ROUTE	11/2	2ND	1ST	3RD	152
ROUTE	3/33	2ND	1ST	3RD	223
ROUTE	10/24	1ST	2ND	3RD	151
ROUTE	301	3RD	2ND	1ST	10
ROUTE	302	3RD	2ND	1ST	11
ROUTE	303	3RD	2ND	1ST	12
ROUTE	311 AM	3RD	2ND	1ST	11
ROUTE	311 PM	3RD	2ND	1ST	34
ROUTE	312	3RD	1ST	2ND	34
ROUTE	501 AM	2ND	1ST	3RD	23
ROUTE	501 PM	2ND	1ST	3RD	23
LumaGo Shuttle		24' Cutaway			
LumaGo Shuttle		24' Cutaway			
					846

**Petaluma Transit has a vehicle fleet of fewer than 50 vehicles.**

**Transit Amenities Policy**

Petaluma Transit assigns transit stop amenities based on the average count of boardings and alightings, site suitability, physical constraints, and proximity to nearby destinations and services.