



SunLine Transit Agency
October 23, 2019
11:20 a.m.-11:50 a.m.

AGENDA

BOARD OPERATIONS COMMITTEE

Conference Room 2
32-505 Harry Oliver Trail
Thousand Palms, CA 92276

In compliance with the Brown Act and Government Code Section 54957.5, agenda materials distributed 72 hours prior to the meeting, which are public records relating to open session agenda items, will be available for inspection by members of the public prior to the meeting at SunLine Transit Agency's Administration Building, 32505 Harry Oliver Trail, Thousand Palms, CA 92276 and on the Agency's website, www.sunline.org.

In compliance with the Americans with Disabilities Act, Government Code Section 54954.2, and the Federal Transit Administration Title VI, please contact the Clerk of the Board at (760) 343-3456 if special assistance is needed to participate in a Board meeting, including accessibility and translation services. Notification of at least 48 hours prior to the meeting time will assist staff in assuring reasonable arrangements can be made to provide assistance at the meeting.

ITEM

RECOMMENDATION

1. CALL TO ORDER

2. ROLL CALL

3. PRESENTATIONS

a) Legislative Update

(Staff: Brittney B. Sowell, Clerk of the Board/Public Affairs Advisor)

4. FINALIZATION OF AGENDA

5. PUBLIC COMMENTS

RECEIVE COMMENTS

NON AGENDA ITEMS

Members of the public may address the Board regarding any item within the subject matter jurisdiction of the Board; however, no action may be taken on off-agenda items unless authorized. Comments shall be limited to matters not listed on the agenda. Members of the public may comment on any matter listed on the agenda at the time that the Board considers that matter. Each person's presentation is limited to a maximum of three (3) minutes.

ITEM

RECOMMENDATION

- 6. COMMITTEE MEMBER COMMENTS
- 7. **TITLE VI PROGRAM UPDATE**
(Staff: Tamara Miles, Compliance/Eligibility Officer)
- 8. ADJOURN

- RECEIVE COMMENTS
- APPROVE
(PAGE 3-82)

SunLine Transit Agency

DATE: **October 23, 2019** **ACTION**

TO: **Board Operations Committee**
Board of Directors

FROM: **Tamara Miles, Compliance/Eligibility Officer**

RE: **Title VI Program Update**

Recommendation

Recommend that the Board of Directors authorize staff to submit SunLine's attached Federal Transit Administration (FTA) Fiscal Years 2020-2023 Title VI Program update, as required by the U.S. Department of Transportation (DOT) FTA Circular 4702.1B.

Background

The Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. SunLine's Title VI Program update meets the requirements of FTA Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients* dated October 1, 2012.

Reporting requirements include:

- An assurance that SunLine has followed and will continue to adhere to Title VI guidelines;
- A copy of SunLine's instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the complaint form;
- A list of any public transportation related Title VI investigations, complaints, or lawsuits filed with SunLine since the last submission;
- A public participation plan that includes an outreach plan to engage minority and limited English proficient (LEP) populations, as well as a summary of outreach efforts made since the last Title VI Program submission; and
- A copy of SunLine's plan for providing language assistance to persons with limited English proficiency based on the DOT LEP Guidance.

Financial Impact

No financial impact.



**SUNLINE TRANSIT AGENCY
FY 2020/2023 TITLE VI TRIENNIAL PLAN
UPDATE**

Submitted in accordance with
Federal Transit Administration
Circular 4702.1B
9/25/2019

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INTRODUCTION

This document was prepared by SunLine Transit Agency (SunLine) staff, to comply with Title VI of the Civil Rights Act of 1964, including provisions detailed in U.S. Department of Transportation's Federal Transit Administration (FTA) Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients."

Section 601 of Title VI of the Civil Rights Act of 1964 states the following:

"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."

To ensure that agencies receiving federal assistance are not discriminating against minority individuals, or communities, regular Title VI reports must be filed with the federal agency providing financial assistance to the agency. To fulfill this requirement, SunLine has completed this Title VI Fiscal Year (FY) 2020 - 2023 Triennial Plan Update for submission to the FTA.

This report is prepared in accordance with the FTA Title VI guidelines as stated in FTA Circular 4702.1B dated 1 October, 2012, and provides a review of SunLine's practices and operations with Title VI.

There are four main sections to this report:

- I. General Reporting Requirements - contains information concerning complaints alleging discrimination based on race, color, or national origin; fixed facility location; and pending applications for financial assistance.
- II. Program Specific Requirements - consists of information concerning service area demographics and service standards.
- III. Title VI Compliance Assessment - examines the quality of service with respect to minority and non-minority census tracts compared to the overall service area.
- IV. Other Areas of Consideration - includes information concerning service evaluation, service changes, and information dissemination.

As a supplement to this report, FTA requires that a census tract base map of the service area be provided with overlays depicting fixed transit routes, minority census tracts, and population information. The maps are submitted to the FTA with this report as appendices.

I. GENERAL REPORTING REQUIREMENTS

The FTA has established specific guidelines for Title VI reports. SunLine compiles and maintains data as required by the FTA. Title VI General Reporting Requirements include the following:

1. Copy of agency's Title VI notice to the public that indicates the agency complies with Title VI, and informs members of the public of the protections against discrimination afforded to them by Title VI (this is included in Appendix 1 of this report).
2. Copy of the agency's instructions to the public regarding how to file a Title VI discrimination complaint including a copy of the complaint form (this is included in Appendix 1 of this report).
3. List of any public transport-related Title VI investigations, complaints, or lawsuits filed with the agency since the time of the last submission (there have been no complaints, investigations, or lawsuits in the period since the last submission of the Title VI Plan).
4. A public participation plan that includes an outreach plan to engage minority and limited English proficiency populations, as well as a summary of outreach efforts made since the last Title VI Plan submission (this is included in Appendix 2 of this report).
5. A copy of the agency's plan for providing language assistance to persons with limited English proficiency, based on the U.S. Department of Transportation (DOT) Limited English Proficient (LEP) Guidance (this is included in Appendix 2 of this report).
6. A table depicting the racial breakdown of the membership of any transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, membership of which is selected by the agency, as well as a description of efforts made to encourage the participation of minorities on such bodies (this is included in Appendix 6 of this report).
7. Narrative or description of efforts made to ensure sub-recipients are complying with Title VI (there has been no sub-recipient Title VI program submissions in the period since the last submission of the Title VI Plan).
8. If the agency has constructed a facility, a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility (there has been no activity in this period since the last submission of the Title VI Plan).

9. Descriptions of all pending applications for financial assistance, and all financial assistance provided by other federal agencies. There are no pending applications.
10. Summary of all civil rights compliance review activities conducted in the last three years (there has been no activity in this period since the last submission of the Title VI Plan).
11. Signed FTA Civil Rights Assurance that all of the records and other information as required under FTA Circular 4702.1B have been or will be compiled, as appropriate, and maintained by the applicant.
12. Signed DOT Title VI Assurance (this is included in Appendix 4 of this report).

Below are outlined SunLine efforts to satisfy these twelve categories:

A. Title VI Policy Notice

Please refer to Appendix 1 for a copy of the agency's Title VI Policy notice to the public (English & Spanish versions included). The notice is placed in all fixed route buses and paratransit vans, at major bus transfer locations, on the agency website and in all agency administration buildings (including staff areas and public meeting rooms).

B. Title VI Procedures for Filing a Complaint

Please refer to Appendix 1 for a copy of the agency's Title VI Procedures for Filing a Complaint.

C. Title VI Investigations

There are currently no active complaints, investigations, or lawsuits against SunLine alleging discrimination on the basis of race, color, national origin with respect to transit service. There has not been any complaints or lawsuits filed against SunLine regarding Title VI in the past three-year period since the last submission. No investigations were conducted.

D. Public Participation Plan

Please refer to Appendix 2 for a copy of SunLine's Public Participation Plan, as well as a summary of outreach efforts (See Appendix 6) since the last Title VI Program submission.

SunLine informs the public of service changes and other important programs and activities, which pertain to SunLine through its information dissemination process. The Public Participation Plan provides a public comment process that is used prior to implementation of fare increases or significant service changes or any new programs.

This process allows the community to express their opinions or concerns about the proposed changes. The process calls for public hearings and also permits written comments to be mailed, e-mailed or faxed to the administrative offices, to ensure that the community has adequate opportunity to comment on any proposed changes. The materials and meetings are provided in both English and Spanish.

E. Limited English Proficiency

An analysis of the population of the SunLine service area, has identified Spanish-speaking Hispanic-Latino populations who speak English less than very well concentrated within Coachella Valley, especially the eastern end of the service area. Please refer to the Appendix 2 for a copy of SunLine's Limited English Proficiency (LEP) Plan, to provide language assistance to persons with limited English proficiency.

To ensure that Spanish-speaking Hispanic-Latino populations within the Coachella Valley, are able to obtain information on transit services and other agency programs, SunLine provides fare and other public information on the buses in both English and Spanish. SunLine brochures are translated in Spanish. Bilingual staff are also available to provide information over the telephone or in person, at the agency administration office.

All information posted on SunLine's website, is available in both Spanish and English. All public meetings and other community outreach conducted can have Spanish-speaking staff provided to translate the meeting content, if requested.

F. Membership of Non-Elected Boards, Councils, and Committees

Please refer to Appendix 6 for a table depicting the racial breakdown of the membership of the SunLine Access Advisory Committee. Staff continuously makes efforts to attract minority representation on this committee, through reaching out to non-profit and other groups and the community.

G Sub-Recipients Title VI Compliance

There are currently no sub recipients.

H. Facility Title VI Equity Analysis

There were no facilities that require Title VI Equity Analysis and currently no sub recipients.

I. Pending Applications for Funding

SunLine receives financial assistance through FTA Sections 5307, 5309, 5310, 5311 and 5311(f) programs.

J. Civil Rights Compliance Review Activities

The most recent review of SunLine's Equal Employment Opportunity (EEO) Policy, including Affirmative Action Program was completed and submitted in June 2016 per FTA EEO requirements.

K. FTA Civil Rights Assurance

A signed FTA Civil Rights Assurance indicating that all of the records, and other information required under FTA Circular 4702.1B have been or will be compiled, as appropriate, and retained at SunLine's administration office in Thousand Palms, is included in Appendix 4 of this document.

L. DOT Title VI Assurance

A signed Standard DOT Title VI Assurance is retained at SunLine's administrative office in Thousand Palms. This Assurance is not included in this Title VI report, since it is maintained as part of the FTA "One-Time Submission" file.

II. PROGRAM SPECIFIC REQUIREMENTS

This section provides specific information relative to Title VI requirements and guidelines for fixed route transit providers. The requirements under Title VI fall within the following categories:

- System-wide standards and policies
- Collect and report data
- Evaluate service and fare equity changes
- Monitor transit service

Based on its existing fleet of 58 buses deployed in peak service, SunLine is required to address all items above.

Set System-wide Standards and Policies

A set of system wide Service Standards Policy was adopted by SunLine's Board of Directors at its July 2013 meeting and last revised July 2019. A copy of this document is included in Appendix 3 of this document. The Service Standards and Policies document consists of three sections:

Service Design Standards: for deployment and design plus refinement of transit services. Standards include:

- Definition of the total 1,120 square mile service area.
- Minimum population threshold for service
- Minimum percentage of population within 0.75 miles of a bus route.
- SunLine transit network service tiers:
 - Trunk Routes

- Local Routes
- Regional Service
- Service Frequency
- Service Span
- Stop Spacing
- Route Spacing
- Route Alignment
- Connectivity
- Stop Amenities

Service Performance Standards: used in evaluating performance of existing transit services to continuously improve their productivity and sustainability:

- Service productivity standards by service tier (passengers per revenue hour)

Service Quality Standards: used to maintain and improve service delivery and the passenger experience, including:

- Service Scheduled Speed
- On-Time Performance (service reliability)
- Percent Service Delivered (service reliability)
- Miles between Service Interruption (service reliability)
- Load Standards (service comfort)
- Average Fleet Age (service comfort)
- Bus Deployment Policy

The metrics relating to the Service Standards Policy will be reported to the SunLine Board of Directors each fiscal year (each December for the previous fiscal year), with Service Performance Standard metrics calculated monthly for ongoing staff review.

SunLine is committed to planning and operating transit services guided by the above service standards policy, applied without regard to the race, color, or national origin of any person wishing to utilize these services.

Major Service Change Policy

Associated with the service standards is a SunLine policy is to consider a “major service change” any permanent service change (6 months or longer duration) of 25% or more in revenue hours and/or revenue miles, span of service, or alignment miles for a given route or the network overall for any day type (Weekday, Saturday, Sunday, and Holidays). Such changes require a public hearing and SunLine Board approval before implementation.

Any change above the 25% threshold may be considered potentially adverse and be subject to Title VI service and fare equity analysis. The analysis will determine whether the proposed changes are more impactful on minority and/or low income communities

than on the overall transit network, and that agency service standards have been consistently applied across the entire transit network.

Disparate Impact Policy

This requirement under Title VI determines whether the proposed changes are more impactful on minority population than on the overall population, a threshold of 20% or greater difference in impact on minority population compared to the non-minority population would be the point where a change is to be considered to have a disparate impact on the minority population.

If such a disparate impact is identified, it will be subject to review and determination of whether mitigation of the disparate impact can be achieved (subject to reanalysis of the revised proposal) or whether the change can still be justified based on having no other option to achieve the program goals that has less severe impact on the minority population resulting in the absence of the proposed change.

Disproportionate Burden Policy

This requirement under Title VI relates to the impact of proposed service or fare changes on the low-income population. Low income population is defined as those persons living in a household at or below the poverty income level guidelines established (based on household size) by the U.S. Department of Health and Human Services. There is considered to be a disproportionate burden on the low-income population when that population has an impact of 20% or greater than the impact on the service area population overall for a proposed service or fare change.

If a disproportionate burden is identified, the proposed change would be subject to review and determination of whether mitigation of the adverse impact can be achieved (subject to re-analysis of the revised proposal) or whether the change can still be justified based on having no other option to achieve the program goals that has less severe impact on the low-income population.

Data Collection and Reporting

This section describes Title VI minority populations within SunLine service area in the Coachella Valley based on the American Community Service data analysis for 2017. SunLine reviewed the American Community data to identify the minority population for the overall service area, as well as for each of the fifteen local transit routes, to determine which transit routes have an above service area average level of minority population. An analysis of the low income (in poverty) community was also made.

Minority Population

The racial classification for minority population SunLine used in the analysis, as outlined in Section I - 4 of FTA Circular 4702.1B, includes the following groups:

1. American Indian/Alaska Native.
2. Asian/ Pacific Islander.

3. Black or African American.
4. Hispanic/Latino.
5. Other Races.

Based on these groups defining minority population, the data shows the following:

- 59.9% of the SunLine service area population belong to a minority group (263,473 out of 439,855 total population).
- Of the minority groups, 87.7% of the minority population is Hispanic/Latino, and 12.3% is other races or multiple races. Of the total service area population, 2.8% are African American, 2.9% Asian/Pacific Islander, 0.1% American Indian/Native Alaskan, and 1.6% two or more races.
- 64.2% percent of the population within 0.75 miles of the SunLine fixed route network belong to a minority group (213,254 out of 332,172 total population).
- Routes varied from a low of 45.0% to a high of 99.0% minority population as a percentage of total population served (population within 0.75 miles' catchment of a transit route).
 - Six (6) local routes (Routes 15, 80, 81, 90, 91, and 95) were above the service area average minority population percentage of 65.8% and the other nine (9) local routes (Routes 14, 20, 21, 24, 30, 32, 54, 70, 111) were below it as was the Palm Springs BUZZ.
 - Three routes (Routes 90, 91 and 95) had percentage minority population catchments high above the service area average (85% or higher). These routes are all located in the eastern Coachella Valley (serving Indio, Coachella, Thermal, Mecca, Oasis and North Shore).
 - Routes 80 and 81 serving Indio had moderately higher minority population catchment percentage compared to the service area average percentage minority population.
 - Route 15 catchment serving Desert Hot Springs and the unincorporated community of Desert Edge was only slightly above the service area average percentage minority population.

- Minority populations were determined using 2017 American Community Survey data. Table 1 below shows the overall SunLine service area as well as each route regarding minority population. See Appendix 5 for maps of this data.

Table 1 - SunLine Service Area Demographic Survey (American Community Survey 2017)

Numbers reflect population count estimates for area within 3/4 mile of route network.

Route	Total Population	Minority	Minority %	White	American Indian / Native Alaskan	Asian / Pacific Islander	African American	Hispanic/ Latino	Other
14	41,100	24,085	58.6%	17,015	241	1,276	2,505	18,979	1,060
15	22,903	16,513	72.1%	6,390	99	462	1,767	13,607	594
20	31,267	18,541	59.3%	12,726	93	1,187	1,354	15,241	667
21	22,817	10,268	45.0%	12,549	62	1,263	349	8,204	483
24	31,113	15,028	48.3%	16,085	180	1,653	1,758	10,790	631
30	47,823	30,224	63.2%	17,599	151	2,267	1,209	25,872	695
32	56,507	32,661	57.8%	23,846	98	2,972	1,208	27,435	947
40 (BUZZ)	16,610	5,647	34.0%	10,963	68	548	757	3,959	322
54	60,186	37,977	63.1%	22,209	76	2,013	1,481	33,572	873
70	36,714	17,182	46.8%	19,532	86	1,271	739	14,021	1,048
80	70,694	58,040	82.1%	12,654	116	1,393	1,451	54,499	580
81	59,594	48,092	80.7%	11,502	96	1,347	1,347	44,726	577
90	51,731	49,558	95.8%	2,173	0	99	347	49,013	50
91	31,055	30,744	99.0%	311	31	31	31	30,621	31
95	27,386	27,057	98.8%	329	0	0	27	27,003	27
111	115,931	72,921	62.9%	43,010	219	2,990	2,406	65,701	1,531
Network	332,221	213,285	64.2%	118,936	853	10,024	9,171	188,117	5,119
Service Area	439,855	263,473	59.9%	176,382	440	13,019	11,876	230,924	7,038

- In terms of percentage of each route's mileage, a review was made to determine if a given route's total revenue mileage was located in a minority population that exceeded the average percentage of minority population in the overall transit service area (59.9%). The analysis showed:
 - Routes 15, 24, 30, 54, 70, 80, 81, and 90 had a revenue mileage percentage within a minority zone high above the average minority population within the service area.
 - Routes 14, 21 and 32 had a revenue mileage percentage within a minority zone slightly above the average minority population within the service area.
 - Due to limited dwellings within the eastern Coachella Valley on the routes 91 and 95 revenue mileage percentages within a minority zone were under the service area percentage for those routes. However, staff acknowledges the minority population in all jurisdictions east of Indio.

Based on this analysis, Routes 15, 24, 30, 54, 70, 80, 81, 90, 91 and 95 are regarded as minority transit route monitoring purposes. Table 2 on the next page, shows the overall SunLine service area as well as each SunLine regard to minority population. See Appendix 5 for maps of this data.

Table 2 - SunLine Service Area Demographic Survey (American Community Survey 2017)

Numbers reflect population count estimates for area within 3/4 mile of route network

Route	One Way Distance (miles)	Distance (miles) within Minority Zone	Percentage of route within Minority Zone
14	14.7	9.6	65.3%
15	8.0	7.0	87.5%
20	24.3	8.0	32.9%
21	6.9	4.7	68.1%
24	10.1	9.3	92.1%
30	9.9	7.9	80%
32	20.2	13.5	67%
40 (BUZZ)	5.3	2.6	49.1%
54	12.5	11.6	92.8%
70	9.8	8.3	84.7%
80	11.2	11.0	98.2%
81	8.7	8.7	100%
90	6.5	6.5	100%
91	25.9	13.7	52.9%
95	26.1	8.6	32.9%
111	30.0	17.7	59.0%

Low Income Population:

An analysis was also completed of the distribution of low income population in SunLine’s service area (as required for Title VI and Environmental Justice compliance). This analysis was based on the American Community Survey of 2017.

This survey identified a 439,855 total population in the SunLine service area in the Coachella Valley. Of this population, 88,042 people were identified as low income (“in poverty”). This means those people living in households at or below the household income poverty based on American Community Survey 2017. This gives a service area average of 20.0% of the population being low income.

Transit routes with higher than the service area average percentage low income population were lines 14, 15, 20, 21, 24, 30, 80, 81, 90, 91, 95, and 111. This is similar to the list of transit lines with above average proportion of minority population. As with minority population proportions, Lines 15, 80, 81, 90, 91 and 95 had the highest percentage of low income population.

Table 3 on the next page outlines the data. Maps included in Appendix 5 show the areas with higher than average minority and or low income population. The eastern Coachella Valley is notable for have both high proportions of minority and low income population.

**Table 3 - SunLine Service Area Demographic Survey
(American Community Survey 2017)**

Numbers reflect population count estimates for area within 3/4 mile of route network

Route	Population Below Poverty Level	Population Poverty %
14	12,423	30.3%
15	9,115	39.8%
20	31,267	26.9%
21	3,262	26.9%
24	6,409	20.6%
30	11,407	23.1%
32	9,606	17.0%
40	3,288	19.8%
54	11,676	19.4%
70	4,625	12.6%
80	14,138	20.0%
81	12,276	20.6%
90	13,346	25.8%
91	11,025	35.5%
95	9,010	32.9%
111	24,458	21.1%
Network	69,766	21.0%
Service Area	88,042	20.0%

Service and Fare Equity Analysis

As part of the evaluation of any significant service change (more than 25% change in revenue miles and/or hours) for any line, a public hearing is conducted. All fare changes are also subject to a public hearing. The following hearings were held during the past three years:

- July 5, 2016 – SunLine Transit Agency (Thousand Palms) 10 AM - 11 AM / 6 PM-7 PM
- July 6, 2016 – SunLine Transit Agency (Indio) 10 AM – 11 AM / 6 PM – 7 PM
- March 7, 2018 – Palm Desert Library 10 AM – 11 AM / 6 PM – 7 PM
- March 8, 2018 – Mizell Senior Center 10 AM – 11 AM / 6 PM – 7 PM

The record for each of these meetings is attached in Appendix 6. The changes are believed to have been consistent with Title VI and did not negatively impact minority or low income communities.

Transit Service Monitoring

The metrics outlined in the Service Standards Policy (see Appendix 3) are in most cases calculated monthly or quarterly for review by staff. With the newly amended Service Standards, an annual report will be provided to the SunLine Board of Directors each December.

All service standards have associated metrics. These metrics will be constantly tracked and responded to in order to ensure that a consistently high standard of service is delivered to all customers and citizens of the Coachella Valley regardless of their race, color, or national origin.

SUNLINE TRANSIT AGENCY FY 2017-2020 TITLE VI APPENDICES

FY 2020-2023 TITLE VI PLAN

APPENDIX 1: Title VI Documents

- TITLE VI POLICY STATEMENT
- TITLE VI PROGRAM SUMMARY
- TITLE VI NOTICES
- TITLE VI COMPLAINT FORMS



AGENCY TITLE VI POLICY STATEMENT

As the regional transit provider of public transportation whose employees have extensive daily contact with the public, SunLine Transit Agency [SunLine] recognizes its responsibility to the community which it serves and is committed to a policy of nondiscrimination. SunLine works to provide non-discriminatory public transportation in support of our mission *"To provide safe and environmentally conscious public transportation services and alternate fuel solutions to the meet the mobility needs of the Coachella Valley"* to enhance the social and economic quality of life for all residents in the Valley.

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).

SunLine grants all citizens' equal access to all its transportation services under Title VI of the Civil Act and it is also the intent of SunLine, that all citizens are aware of their rights to such access. SunLine is committed to ensuring that no person is excluded from participation or denied benefits of its services on the basis of race, color or national origin as stipulated by Title VI of the Civil Rights of 1964, as amended. To that end it is SunLine's objective to:

1. Ensure that the level and quality of transportation service is provided without regard to race, color or national origin.
2. Promote fair participation in transportation decision making for all affected population;
3. Prevent the denial, reduction or delay in benefits related to programs and activities that benefits minority or low-income and populations;
4. Ensure meaningful access is granted to programs and activities for people with limited English proficiency.

The Environmental Justice component of Title VI guarantees fair treatment for all people and provides for SunLine to identify and address, as appropriate, disproportionately high and adverse effects of its programs, policies, and activities on minority and low-income populations, such as undertaking reasonable steps to ensure that Limited English Proficiency (LEP) persons have meaningful access to the programs, services, and information SunLine provides. Environmental Justice Regulations are:

- (a) To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low income populations;
- (b) To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process;
- (c) To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

The Compliance Officer is the designated Title VI Officer responsible for compliance and monitoring to ensure non-discriminatory provision of transit services and programs. In that capacity, the Planning Department is responsible for implementing all aspects of the Title VI program. However, along with the CEO/General Manager, all Department Directors, Managers, and their staff share the responsibility for making SunLine's Title VI Program a success. Implementation of the Title VI Program is accorded the same priority as compliance with all other legal obligations incurred by SunLine in its financial assistance agreements with the Department of Transportation.

Lauren Skiver, CEO/General Manager

Date



TITLE VI PROGRAM

SunLine Transit Agency (SunLine) Title VI Policy Statement

SunLine treats its customers with respect and integrity:

SunLine Transit Agency (SunLine), in accordance with the United States Department of Transportation Title VI Regulations (49 CFR part 21) operates its programs without regard to race, color, creed, national origin, sexual preference, marital status, age, medical condition, or disability in compliance with Title VI of the Civil Rights Act of 1964, California Civil Code section 51(b), or other applicable law.

SunLine's Title VI Policy Statement:

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." SunLine grants all citizens' equal access to all its transportation services under Title VI of the Civil Act and it is also the intent of SunLine, that all citizens are aware of their rights to such access.

Complaint Process:

Filing a Title VI Complaint?

Persons who believe they have received discriminatory treatment or practice under Title VI may file a complaint with SunLine. For information on filing a complaint, contact SunLine's Compliance Officer. Complaints must be in writing and 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 and send it to:

SunLine Transit Agency
32-505 Harry Oliver Trail
Thousand Palms, CA 92276
Attn: Title VI Officer

Verbal complaints will be accepted and transcribed by the Title VI Officer. To make a verbal complaint, call (760) 343-3456 and ask for the Title VI Officer. You also have the right to file your complaint with the United States Department of Transportation (USDOT), a federal or state agency, or a federal or state court.

Should a complaint be filed with SunLine and an external entity simultaneously, the external complaint may supersede the complaint to SunLine and the internal complaint procedures will be suspended pending the external entity's findings.

Investigations

Within 15 working days of receipt of the formal complaint, the Title VI Officer 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 filed against transit service offered by SunLine and will 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 own choosing and may bring witnesses and present testimony and evidence in the course of the investigation.

The investigation will be conducted and completed within 60 days of the receipt of the formal complaint. The complainant will receive a letter stating the final decision of the Executive Director 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 Federal Department of Transportation.



TITLE VI PROGRAM

As the regional transit provider, SunLine Transit Agency (SunLine), operates its programs in accordance with the United States Department of Transportation Title VI of the Civil Rights Act Regulations (49 CFR part 21), California Civil Code section 51(b).

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).

Persons who believe they have received discriminatory treatment or practice under Title VI may file a complaint with SunLine Transit Agency. For information on filing a complaint, contact SunLine's Planning Department. Complaints must be in writing and must be filed no later than 180 calendar days of the alleged discriminatory incident. The preferred method is to file your complaint in writing using the Title VI Complaint Form and send it to:

SunLine Transit Agency
Attn: Title VI Officer
32-505 Harry Oliver Trail
Thousand Palms, CA 92276

Verbal complaints will be accepted and transcribed by the Title VI Officer. To make a verbal complaint, call 1-800-347-8628 and ask for the Title VI Officer. You also have the right to file your complaint with the United States Department of Transportation (USDOT), a federal or state agency, or a federal or state court. For further information please visit our website sunline.org

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Programa De Título VI

Como el proveedor de tránsito regional, La Agencia de Tránsito SunLine (SunLine), opera sus programas de acuerdo con el Departamento de Transporte del Título VI del Reglamento de la Ley de Derechos Civiles (49 CFR parte 21), la sección del Código Civil de California 51 (b) de los Estados Unidos.

El Título VI del Acta de Derechos Civiles de 1964 prohíbe la discriminación por motivos de raza, color u origen nacional en los programas y actividades que reciben asistencia financiera federal. Específicamente, el Título VI establece que "ninguna persona en los Estados Unidos, por motivos de raza, color, u origen nacional, será excluida de participar en, será negada los beneficios de, o será sujeta a discriminación bajo cualquier programa o actividad que reciba asistencia financiera federal." (42 U.S.C. Sección 2000d).

Las personas que creen que han recibido tratamiento o práctica discriminatoria bajo el Título VI, pueden presentar una queja con SunLine Transit Agency. Para obtener información sobre cómo presentar una queja, comuníquese con el Departamento de Planificación de SunLine. Las quejas deben ser por escrito y deben ser presentadas a más tardar 180 días del supuesto incidente discriminatorio. El método preferido es el de presentar su queja por escrito utilizando el Formulario de Quejas del Título VI y enviarlo a:

SunLine Transit Agency
Attn: Title VI Officer
32-505 Harry Oliver Trail
Thousand Palms, CA 92276

Quejas verbales serán aceptadas y transcritas por el Oficial del Título VI. Para presentar una queja verbal, llame al 1-800-347-8628 y pregunte por el Oficial del Título VI. Usted también tiene el derecho de presentar una queja ante el Departamento de Transporte de los Estados Unidos (USDOT), una agencia federal o estatal, o por un tribunal federal o estatal. Para más información, por favor visite nuestro sitio web sunline.org

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LIST OF LOCATIONS WHERE TITLE VI NOTICE IS POSTED

SunLine Transit Agency’s Title VI notice to the public is currently posted at the following facility locations:

LOCATION NAME	ADDRESS	CITY
SunLine Division 1 Offices	32-505 Harry Oliver Trail	Thousand Palms
SunLine Division 2 Offices	83255 Highway 111	Indio
Thousand Palms Transit Hub	72-480 Varner Road	Thousand Palms
SunLine Coachella Transit Hub	790 Vine Street	Coachella

The Title VI notice and program information is provided at all major transfer locations and on SunLine’s website at: www.sunline.org. New locations may be added as needed.



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”. If you wish to submit a Title VI complaint to SunLine Transit Agency, please complete this form and send it to:

SunLine Transit Agency
Attn: Title VI Officer
32-505 Harry Oliver Trail
Thousand palms, CA 92276
Office (760) 343-3456
Fax (760) 343-0576

PLEASE
PRINT CLEARLY

Name:

Address:

City, Street, Zip Code:

Telephone: Home: _____ Cell: _____

If applicable name and title of persons(s) who allegedly discriminated against you:

Please check which of the following best describes the type of discrimination experienced:

- Race
- Color
- National Origin

What date did the alleged incident take place?

Name the location where the alleged incident took place:

Is this activity or incident still on going?

In your own words, please describe the alleged incident and explain what happened and whom you believe was responsible:

Please list any person(s) we may contact for additional information to support your complaint.

Have you filed this complaint with any other federal and state agency, or with any federal or state court?

Yes

No

If yes, check all that apply:

Federal Agency

Federal Court

State Agency

State Court

Please provide the name and phone number of the contact persons at the agency/court where the complaint was filed:

Please sign below and attach any written or other information that you think is relevant to your complaint.

Signature: _____ Date: _____



FORMULARIO DE QUEJA DEL TÍTULO VI

El Título VI de la Ley de Derechos Civiles de 1964 prohíbe la discriminación en base a raza, color, ú origen nacional en programas y actividades que reciben asistencia financiera Federal. Específicamente, el Título VI dice que debido a su raza, color, ú origen nacional "ninguna persona en los Estados Unidos será excluida de participar, se le negará beneficios, ó será sometido a discriminación bajo ningún programa ó actividad que recibe ayuda económica Federal." Si usted desea presentar una queja del Título VI a la agencia de tránsito de SunLine, por favor llene el formulario y envíelo a:

SunLine Transit Agency
Attn: Title VI Officer
32-505 Harry Oliver Trail
Thousand Palms, CA 92276
(760) 343-3456 (oficina)
(760) 343-0576 (fax)

POR FAVOR IMPRIMA CLARAMENTE

Nombre:

Dirección:

Ciudad, Estado, Código Postal:

Teléfono: Casa _____ Celular _____

Si es aplicable, escriba el nombre y título de la(s) persona(s) que discriminaron contra usted:

Por favor marque lo siguiente que mejor describa el tipo de discriminación que sufrió:

- Raza
- Color
- Origen nacional

¿En que fecha ocurrió el incidente?

Por favor firme abajo e incluya cualquier información por escrito que usted piense que sea pertinente a su queja.

Firma: _____ Fecha: _____

FY 2020-2023 TITLE VI PLAN

APPENDIX 2:

- LIMITED ENGLISH PROFICIENCY (LEP) PLAN
- PUBLIC PARTICIPTION PLAN



LIMITED ENGLISH PROFICIENCY (LEP) PLAN

In accordance with Title VI of the 1964 Civil Rights Act, SunLine Transit Agency (SunLine) as a federal grantee is obligated to reduce language barriers, that could preclude meaningful access by Limited English Proficiency (LEP) persons to important benefits, programs, information and services offered by the agency. Executive Order 13166 requires agencies receiving federal assistance to improve access to all programs and services for LEP persons.

Purpose

This document establishes guidance for SunLine, in establishing a LEP Plan as required by Section 2 of Executive Order 13166. It is SunLine's policy to provide meaningful access to its programs and services to persons who, as a result of national origin, are limited in English proficiency. This LEP Plan is established pursuant to and in accordance with Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency."

SunLine's mission is to ensure equal access to programs and services to all residents, who use transit services provided in the Coachella Valley for their mobility needs. This Plan serves as guidance for staff in helping LEP persons. SunLine has taken a number of steps, outlined in this document, to assist LEP individuals to access its programs, and services, and is committed to improving access. As a federal grantee, SunLine will examine services it provides to the public. SunLine will develop and implement a system, by which LEP persons can meaningfully access those services consistent with, and without unduly burdening, the fundamental mission of the agency. This LEP Plan will guide SunLine's efforts, to improve access to programs and services it currently provides.

SunLine LEP Plan is designed to assist staff by providing guidance on translation, interpreter, and outreach services for LEP persons seeking access to its programs. The first priority of the LEP Plan, is to improve access for LEP individuals to critical services or activities. SunLine will focus on improving access to its other programs and services, particularly in those areas with regular contact with LEP persons. This LEP Plan is designed to address those instances in which SunLine staff directly interacts with and serves LEP persons.

LEP Needs Evaluation:

As part of the process of evaluating its LEP needs, SunLine uses the four factors analysis of programs, services, and information for patrons that use transit services offered in the Coachella Valley. These factors include:

1. Number or proportion of LEP persons eligible to be served or would likely be encountered by the program or grantee.
2. Frequency with which LEP individuals come in contact with the program or services.
3. Nature and importance of the program, activity, or service provided by the program to people's lives; and
4. Resources available to the grantee and the cost involved.

SunLine's uses a clearly defined model to assess needs of LEP persons within its service area which consists of:

A. Demographic Review and Evaluation:

This element allows the Planning staff to evaluate through research of census data to identify LEP persons who may need language assistance, as well as identify, which language assistance will be provided.

US Census 2017 American Community Survey data was examined for SunLine's service area overall and for each of the 15 local transit routes, one commuter service, and one BUZZ trolley service operated. The results of that analysis are shown in the table below. From the total population of 160,534 people with data available, within ¾ miles of a route or the network, 10.1% of this population was considered less than very proficient in English. 91.7% of this group was of Hispanic/Latino ethnicity. This pattern held for routes also, with at least 77.0% (more commonly 85% or higher) of any route catchment being LEP people of Hispanic/Latino ethnicity. Detailed data is shown in the table below.

Based on this information, the agency has focused efforts to engage successfully with the LEP Hispanic/Latino people, to ensure they can fully utilize SunLine Transit Agency services.

Numbers reflect population count estimates for area within 3/4 mile of route or network.

Route	Total Population	Limited English Proficiency	Limited English Proficiency %	Speak Spanish with Limited English Proficiency	Speak Spanish with Limited English Proficiency % of overall LEP	Speak Other Indo-European Language with Limited English Proficiency	Speak Asian or Pacific Islander Language with Limited English Proficiency	Speak Other Language with Limited English Proficiency
14	21,064	1,638	7.8%	1,403	85.7%	33	199	3
15	13,822	1,453	10.5%	1,302	89.6%	23	120	8
20	28,204	1,733	6.1%	1,471	84.9%	79	174	9
24	15,685	927	5.9%	714	77.0%	70	137	6
30	21,835	2,082	9.5%	1,793	86.1%	35	161	93
32	34,140	1,752	5.1%	1,501	85.7%	112	130	9
54	20,037	690	3.4%	534	77.4%	45	102	9
70	21,752	621	2.9%	387	62.3%	38	118	78
80	18,428	3,823	20.7%	3,715	97.2%	14	85	9
81	14,745	3,389	23.0%	3,312	97.7%	14	54	9
90	16,463	4,918	29.9%	4,891	99.5%	4	14	9
91	18,493	6,683	36.1%	6,673	99.9%	-	1	9
95	13,123	4,641	35.4%	4,632	99.8%	-	-	9
111	64,088	7,569	11.8%	7,072	93.4%	175	271	51
Network	142,377	15,266	10.7%	14,030	91.9%	347	755	134
Service Area	160,534	16,246	10.1%	14,905	91.7%	411	795	135

** Limited English Proficiency are those people responding that they speak the English language "Well", "Not Well", or "Not At All"

B. Internal Assessment:

The assessment enables staff to evaluate performance data on all routes, review existing services and programs, evaluate current demand for services, cost for providing services, as well as evaluate current level of language assistance offered to LEP persons. This helps in training staff on how to work with LEP persons and ensures that SunLine notifies LEP persons of programs.

SunLine is the major provider of public transportation in the Coachella Valley. A 2019 Rider Survey revealed that of the nearly 1,400 riders surveyed, 85% are transit dependent. This means that SunLine bus services are the principal means that this population uses for work, school, shopping and entertainment. Transit is essential to LEP customers.

LEP persons ride SunLine fixed route and paratransit buses, contact SunLine by telephone and by email, attend public hearing workshops, attend Board meetings and community meetings that discuss transit issues, and they apply for employment at Sunline.

Regarding information of SunLine services (printed materials or on our website, www.sunline.org), such information is provided in both English and Spanish. Examples of printed materials provided in both languages include:

- o SunDial Rider's Guide
- o How to Ride SunBus
- o How to Bike and Bus
- o System Map
- o Pass Outlet Information
- o ADA Certification Application
- o Mobility Training Program

All website content can be accessed in Spanish by pressing a prominently located button at the top of each display. Staff who speak Spanish are available at both the agency's customer service phone line (3.2% of calls in Spanish), SunDial reservations (4.6% of calls in Spanish), and at the agency's reception at Thousand Palms (less than 0.5% of inquiries were in Spanish). Emails in Spanish receive responses in Spanish.

The agency also has an outreach specialist who attends public hearings, public events, or specially arranged meetings to promote the range of SunLine services, and this person is fluent in both Spanish and English. The agency has signs posted in Spanish in public spaces with SunLine's administrative offices. Signs in Spanish are also posted at SunLine's public hearings and events.

SunLine's Planning section, also has Spanish-speaking staff available for public hearings regarding transit service and fare proposed changes, as well as ensuring information (presentations, printed materials) are readily available. This is especially important in addressing service and fare changes in the east end of the Coachella Valley, where LEP customers are most common, though it is a valley-wide issue.

C. External Assessment

This assessment allows SunLine to conduct market research studies, evaluate the effectiveness and efficiency of existing programs, and services to determine the need for additional services, as well as improve these services and programs. Furthermore, it enables staff to continue monitoring and updating the LEP guidance.

Existing efforts to accommodate LEP persons are described above. Additional efforts under consideration are (1) an "I Speak" card for drivers to distribute to LEP persons. The card has various translations of information how to access the agency and to speak to a person in that language. Use of the card will be included in Driver training, and in safety meetings. (2) Internal/External Voice Announcements are currently in English only. Spanish speaking announcements will be considered. (3) Car cards can be added to buses that provide information in Spanish of how to access the agency and to speak to a person who speaks Spanish.



PUBLIC PARTICIPATION PLAN

SunLine informs the public of service changes, and other important activities, which pertain to its service delivery through a specific information dissemination process. This policy states the public comment process that is used prior to the implementation of fare increases or significant service changes.

FARE/SERVICE CHANGE & PUBLIC COMMENT POLICY AND PROCEDURE

Basic Requirement

SunLine is required by Federal Transit Administration (FTA) guidelines to establish a policy, which defines the process used by SunLine to solicit and consider public comment prior to implementation of fare increases and significant service changes. The policy is also intended to differentiate between relatively minor changes, which do not necessitate a formal public comment process, and major changes for which public input will be sought.

SunLine Policy

The Board of Directors has an adopted policy which requires that public comments be solicited prior to any permanent change which increases fares or results in a 25% or more change in revenue miles and/or hours or revenue alignment miles or span of service hours for a given route or the overall network on a given day type (Weekday, Saturday, Sunday or Major Holiday).

Public Notification

As required, the public comment process begins with publishing a legal notice in the local newspaper of wide general circulation. The notice will be offered in both English and Spanish. The notice will set a specific date, time, and location for one or more public hearings. Written comments, via mail, fax or email, will also be accepted on the proposed adjustments for a period of not less than 30 calendar days from initial publishing of the legal notice. Public hearings will be held no earlier than 30 days following the initial publication of the legal notice. Written comments will be accepted for a minimum of three years' calendar days following a public hearing. Legal notices will inform the public of proposed changes for which the public comment process is being held, how comments will be received, and, if applicable, the locations, dates, and times of scheduled public hearings.

Scheduling Public Hearing Location and Time

Service changes that have system-wide impact (such as a fare change) may require multiple public hearing locations in order to maximize convenience to patrons that are affected, including minority populations most concentrated in the eastern end of the Coachella Valley. This will mean meetings will normally be scheduled at facilities located at both the west and east ends of the Coachella Valley, to provide easy access for those who may live at either end of the valley. To the extent possible, public hearings will be scheduled at locations 1) in proximity to the area affected by the proposed adjustments, 2) at different times of day (mid-morning and early evening) weekdays, and 3) accessible by regular bus routes at times when these are operating. All facilities utilized for public hearings will be accessible to persons with disabilities. Special arrangements will be made for the sight or hearing impaired if requested at least 24 hours in advance. Translation services will be provided for Spanish speaking attendees at the public meetings and all key printed materials will be made available in Spanish.

Procedure for Conducting Public Hearings

Comment forms will be offered to attendees to register their presence and desire to speak or as an alternate method of providing their written comments. Public hearings will begin with a reading of the public notice. The purpose, proceedings, and proposed actions, which necessitated the public hearings, will be explained for clarification. Introductory proceedings will encourage the audience to comment on the proposed actions for which the hearing was scheduled. When the explanation of proposed actions is completed, the public are invited to offer their comments. The public are requested to limit their individual comments to three (3) minutes until all persons have been given the opportunity to speak. After all, registered persons have commented, a final opportunity is offered for any additional public comment. This offering will precede the close of the public hearing.

Documentation of Public Hearings

Official records of SunLine's public hearings on fare or major service adjustments will be generated by development of 1) affidavits of newspaper publications of public notices, and 2) notes of proceedings. Tape recordings of the public hearings will be the preferred means of recording public hearing documentation. Records of public comment will be maintained on file at SunLine.

Addressing Public Comments Received

All relevant comments, received verbally or in writing at a public hearing, or as otherwise conveyed to SunLine prior to the established deadline, will be entered into the public record of the comment process. Subsequent to the comment period, staff will evaluate and analyze all relevant comments received. SunLine Board of Directors will be notified by the CEO/General Manager of all public comment solicitations in advance of all scheduled public hearings on fare and service adjustments. Upon review by the Board, the CEO/General Manager will be directed accordingly to proceed with or amend the recommended service and/or fare changes.

FY 2020-2023 TITLE VI PLAN

APPENDIX 3:

- MAJOR SERVICE CHANGE POLICY
- DISPARATE IMPACT POLICY
- DISPROPORTIONATE BURDEN POLICY
- EQUITY ANALYSIS
- SERVICE STANDARDS POLICY

SUNLINE TRANSIT AGENCY MAJOR SERVICE CHANGE POLICY

SunLine policy is to consider a “major service change” any permanent service change (6 months or longer duration) of 25% or more in revenue hours and/or revenue miles, span of service, or alignment miles for a given route or the network overall for any day type (Weekday, Saturday, Sunday, and Holidays). Such changes require a public hearing and SunLine Board approval before implementation.

Any change above the 25% threshold may be considered potentially adverse and be subject to Title VI service and fare equity analysis. The analysis will determine whether the proposed changes are more impactful on minority and/or low income communities than on the overall transit network, and that agency service standards have been consistently applied across the entire transit network.

SUNLINE TRANSIT AGENCY DISPARATE IMPACT POLICY

In order to determine whether the proposed changes are more impactful on minority population than on the overall population, a threshold of 20% or greater difference in impact on minority population compared to the non-minority population would be the point where a change is to be considered to have a disparate impact on the minority population.

If such a disparate impact is identified, it will be subject to review and determination of whether mitigation of the disparate impact can be achieved (subject to reanalysis of the revised proposal) or whether the change can still be justified based on having no other option to achieve the program goals that has less severe impact on the minority population resulting in the absence of the proposed change.

SUNLINE TRANSIT AGENCY DISPROPORTIONATE BURDEN POLICY

This policy is provided in relation to the impact of proposed service or fare changes on the low-income population. Low income population is those people living in a household at or below the poverty income level guidelines established (based on household size) by the U.S. Department of Health and Human Services. There is considered to be a disproportionate burden on the low-income population when that population has an impact of 20% or greater than the impact on the service area population overall for a proposed service or fare change.

If a disproportionate burden is identified, the proposed change would be subject to review and determination of whether mitigation of the adverse impact can be achieved (subject to reanalysis of the revised proposal) or whether the change can still be justified based on having no other option to achieve the program goals that has less severe impact on the low-income population.

TITLE VI EQUITY ANALYSIS OF PROPOSED SERVICE AND FARE CHANGES

1 What service and/or fare changes does SunLine propose? Please describe the nature of the change, the bases or rationale for the change, the modes of service impacted, and the communities affected by the change.

Service Changes. can include, but are not limited to, route extensions, route deletions, route additions, changes in hours or days of operation, changes due to contracting out transit services, and changes in headways.

Fare Changes. can include, but are not limited to, across-the-board fare increases or decreases on all modes of transit provided by SunLine, or fare changes provided on the agency's transit modes or made on fare payment media or fare payment types.

2 What are the impacts of the service changes on minority and/or low income communities?

Service Changes. For proposed major service changes that would reduce or expand frequency or span of hours of service or add or eliminate routes, SunLine produces maps of the routes that would be eliminated, reduced, added, or expanded, overlaid on a demographic map of the service area, that highlights traffic analysis zones where the total minority and low-income population is greater than the service area average. This will identify any routes or route segments subject to changes that will impact above service area average minority and/or low income populations.

Fare Changes. For proposed changes that would increase or decrease fares on certain transit modes or by fare payment type or payment media, SunLine will analyze any available information generated from ridership surveys indicating whether minority and/or low-income riders are more likely to use the specific fare type, payment type, or payment media that would be subject to change.

3 What are the transit alternatives available for riders who would be impacted by proposed service changes?

Service Changes. For proposed service changes, SunLine will analyze what, if any modes of transit or transit routes that is available for people affected by the service expansions or reductions. This analysis will compare the travel time and cost of the current route with the travel time and cost to the rider for the alternatives.

Fare Changes. For proposed fare changes, SunLine will analyze what, if any, alternative transit modes, fare payment types, or fare payment media are available for people affected by the fare change. This analysis should compare the fares paid under the change with fares that would be paid through available alternatives.

4 What, if any measures would SunLine take to avoid, minimize, or mitigate any adverse effects of the service and/or fare change on minority populations and/or low-income populations? What, if any enhancements or offsetting benefits would SunLine implement in conjunction with the service and/or fare change?

Measures that SunLine will take to avoid, minimize or mitigate any adverse effects of the service and/or fare change on minority and/or low income populations include holding meetings to discuss the proposed service and/or fare changes as well as consider input from the public to mitigate or minimize such impacts.

5 Would the proposed service and/or fare change have a disproportionately high and adverse effect on minority populations and/or low-income populations?

A disproportionately high and adverse effect is one that (1) is predominately borne by a minority and/or a low-income population, or (2) will be suffered by the minority and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population.

In making determinations regarding disproportionately high and adverse effects on minority and low-income populations, mitigation and enhancements measures that will be taken and all offsetting benefits to the affected minority and low-income populations may be taken into account.

SunLine would only implement service reductions or fare increases that would have disproportionately high and adverse effects provided that the Agency can demonstrate that the action meets a substantial need that is in the public interest and that other alternatives would have more severe adverse effects than the preferred alternative.

6 What steps does SunLine plan to take to seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach and involvement activities?

SunLine has a public participation process that offers early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions. SunLine has wide latitude to determine how, when, and how often specific public involvement measures should take place, and what specific measures are most appropriate. SunLine makes these determinations based on the composition of the population affected by its action, the type of public involvement process planned, as well as resources available to the Agency. Efforts to involve minority and low-income people in public involvement activities can include both comprehensive measures, such as placing public notices at selected bus stops, and in all vehicles, and measures targeted to overcome linguistic, institutional, cultural, or other barriers that may prevent minority and low-income populations from effectively participating in a recipient's decision-making. The agency is sensitive to engaging the minority and/or low income population, especially where they are most concentrated in the eastern Coachella Valley.

7 Does SunLine believe that it is necessary to disseminate information on the service changes/fare increases that is accessible to LEP persons? If so, what steps to provide information in languages other than English does SunLine propose?

Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP. What steps a recipient decides to take should depend on the number and proportion of LEP persons served by the recipient, the frequency with which LEP individuals come into contact with the program, activity, or service, the nature and importance of the program, activity or service, and the resources available to the recipient and costs of providing language assistance. SunLine is sensitive to these factors in planning any hearing for service and/or fare changes, and other public meetings.

SERVICE STANDARDS POLICY

PURPOSE

The purpose of the Service Standards Policy is to provide a policy framework for guidance of staff in the design, operation, and management of SunLine Transit Agency's transit services.

SCOPE

The provisions of this policy shall apply to all SunLine staff in the design, operation, and management of SunLine's transit services.

POLICY

SunLine's Service Standards Policy objectives shall be to:

- a. Promote the continuous improvement of transit service throughout the Coachella Valley and the maximization of mobility benefits to the community.
- b. Support the agency in meeting Federal Title VI of the Civil Rights Act of 1964 (Title VI) requirements in avoiding arbitrary discriminatory decisions regarding provision of transit service.

PROCEDURES

1. Background

SunLine is the sole provider of regular scheduled fixed route (SunBus) and complementary Americans with Disabilities Act of 1964 (ADA) Paratransit (SunDial) service for the Coachella Valley in Southern California.

SunLine Transit Agency is a Joint Powers Authority established in 1977 to provide public transit services to nine member cities and seven Riverside County unincorporated communities. It is governed by a Board of elected officials, one from each of the nine member cities, plus the county supervisor.

The stated vision, mission, and goals of the agency are as follows:

- Vision
 - SunLine Transit Agency is the regional transportation mode of choice.
- Mission:
 - To provide safe and environmentally conscious public transportation services and alternative fuel solutions to meet the mobility needs of the Coachella Valley.
- Goals:
 - To provide dynamic organizational leadership and change consistent with the growth of the transit agency.
 - To continue the advancement of innovative transportation and alternative fuel technologies.
 - To provide leadership for the region's mobility needs.
 - To provide high quality transportation services that are safe, efficient, and effective.

1. Service Area and Transit Network

SunLine operates a range of services:

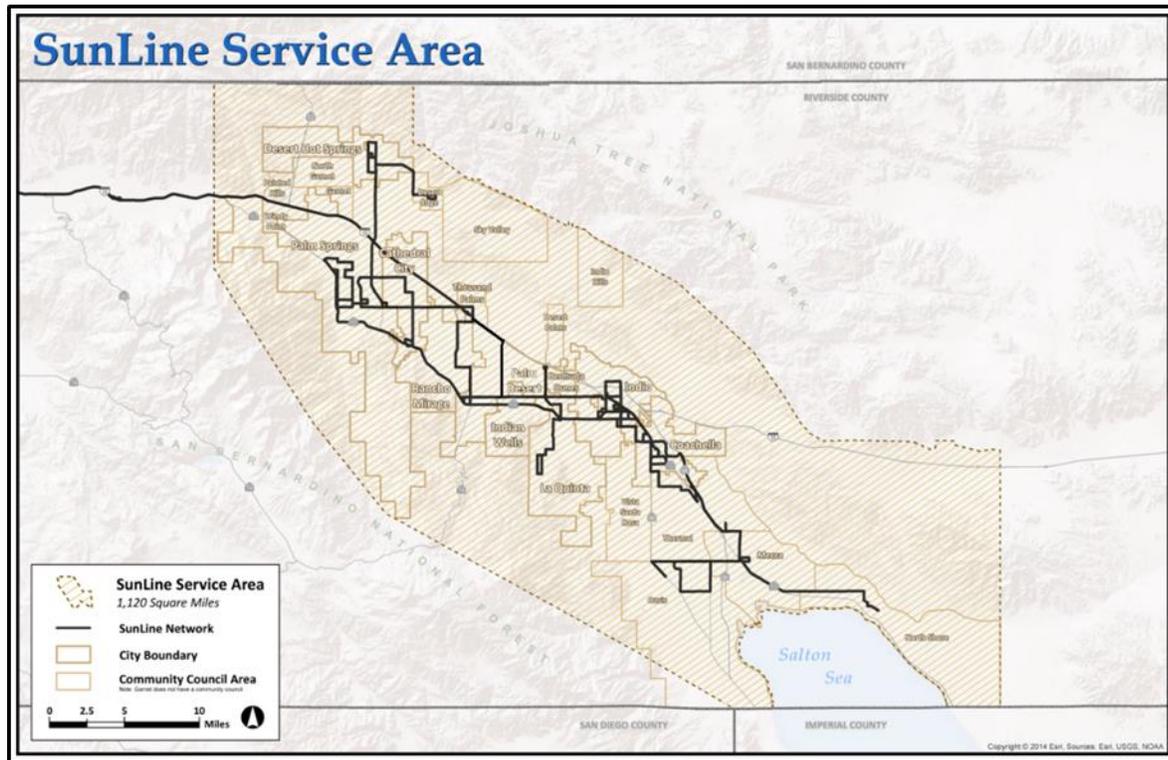
- SunBus provides 15 fixed transit routes throughout the Coachella Valley and 1 fixed route trolley service in the City of Palm Springs (PS BUZZ).
- SunLine Regional Service provides local and regional passenger bus service between the Coachella Valley and Riverside.
- SunDial provides transportation service required by the Americans with Disabilities Act of 1964 (ADA) for individuals with disabilities who are unable to use the SunBus fixed route service; the system must be comparable to the fixed route system.
- Half Fare Taxi Voucher Program is a curb-to-curb, premium demand response service designed to transport residents of the Coachella Valley who are 60 years of age and older. It is provided through local taxi operators and is available 24 hours a day, year round. The continuation of this program is contingent upon grant funding.

SunLine has a 1,120 square mile service area from the Highway 111/Interstate-10 Junction in the northwest to the Imperial County border in the southeast, bounded by mountains to

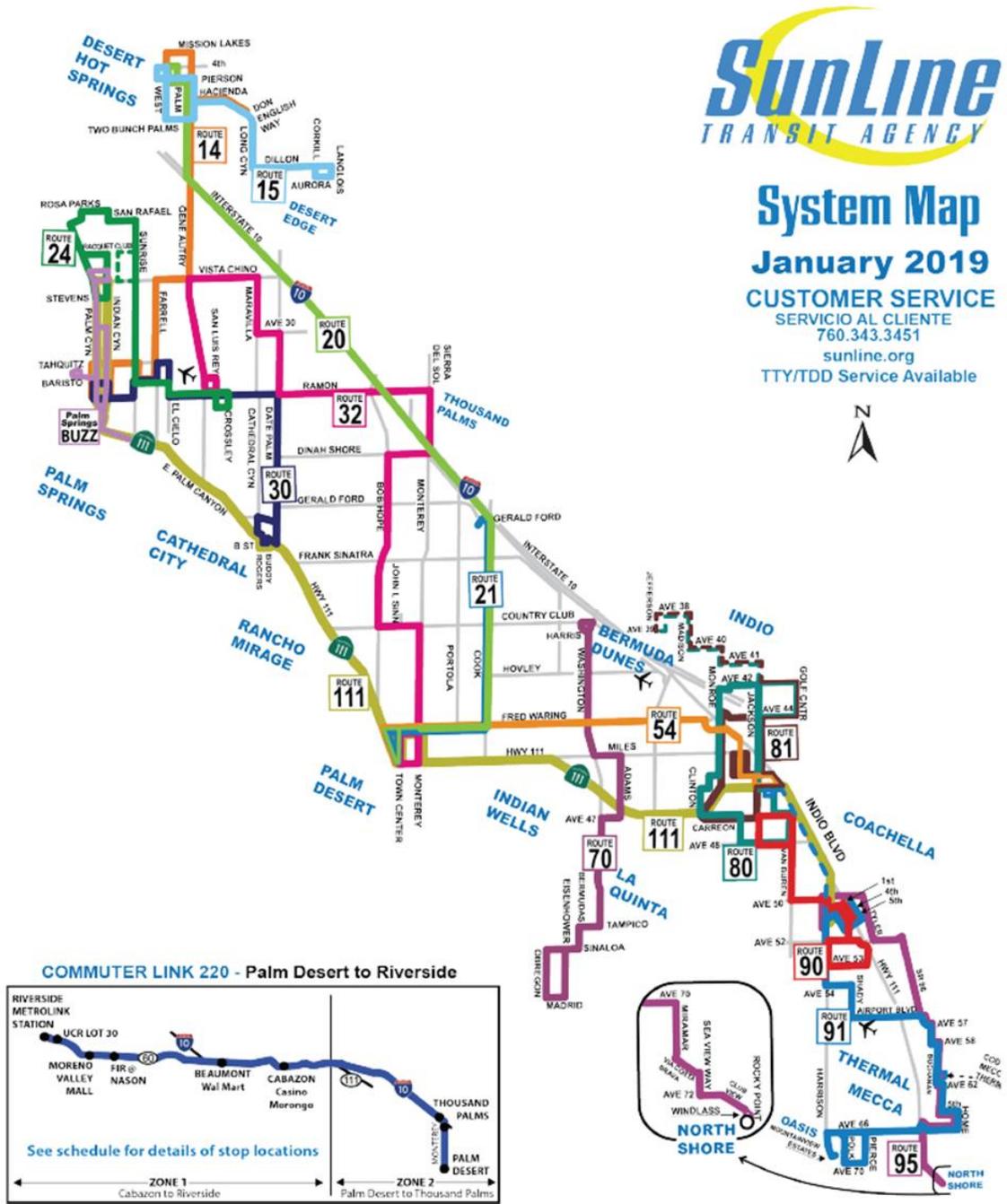
the north and south. The agency currently serves the nine member cities (from west to east) of Desert Hot Springs, Palm Springs, Cathedral City, Rancho Mirage, Palm Desert, Indian Wells, La Quinta, Indio, and Coachella, plus the seven unincorporated communities of Thousand Palms, Bermuda Dunes, Desert Edge, Thermal, Mecca, Oasis, and North Shore.

Below, Map 1 illustrates the SunLine service area; Map 2 shows the January 2019 fixed route transit network.

Map 1 – SunLine Service Area



Map 2 – SunLine Transit Service Network



2. Service Standards Overview

This document sets service standards for service design, service performance, service quality and service warrants.

- **2.1 Design Standards:** Design Standards refer to the design of transit services in regards to service tiers, frequency, service span, stop and route spacing, route alignment, connectivity, and stop amenities.
- **2.2 Performance Standards:** Performance Standards are used to evaluate the performance of existing transit services to continuously improve productivity and sustainability.
- **2.3 Quality Standards:** Quality Standards are used to maintain and improve the consistency and reliability of service delivery as well as the passenger experience.
- **2.4 Warrants Standards:** Warrants Standards provide a way to determine which areas within the large service area will have both the passenger demand and performance potential to produce cost effective fixed route transit service.

2.1 Service Design Standards

Service Tiers the SunLine transit network is classified into three tiers that define the service level and performance expectations for each service:

- **Trunk Routes** – Routes 14, 30, and 111
- **Local Routes** – Routes 15, 20-Express, 21, 24, 32, 54, 70, 80, 81, 90, 91, 95 and Palm Springs BUZZ
- **Regional Service** – Link 220

Minimum service level specifications or warrants are responsive to the service tiers, network connectivity, and ridership/demand requirements. Minimums may be exceeded where supported by demand and prioritized for funding of such higher service levels.

Trunk Routes are designed to deliver service in highly populated areas with high ridership and productivity anticipated, also known as ridership per revenue hour. Generally, to meet the demand, higher frequencies are required to accommodate the demand for service. Additionally, the service links travel between multiple communities often serving the Coachella Valley’s busiest corridors.

Local Routes are designed to pick up and deliver passengers to a Trunk Route and therefore necessitate lower levels of service due to the provision of localized transportation. Generally, these routes typically have lower overall ridership and productivity.

Regional Service is designed to provide express service to regional destinations, improving access to jobs and job services across the county and beyond (via connection to the regional rail network and/or Trunk Routes).

Key attributes in relation to these services include:

- Stop frequencies and span
- Stop spacing
- Route spacing
- Route alignment

- Connectivity
- Stop amenities

Service Frequency and Service Span Standards

Service frequency is a leading factor that attracts new riders to a transit system. Frequency defines how long customers wait for bus service in relation to the time in which they arrive at the stop. Industry experience shows more customers spontaneously show up to stops instead of planning their trips, and higher levels of frequencies decrease the average wait time for random arrivals. While high frequency service is desirable, different mobility and service types warrant different levels of transit service.

Similar to service frequency, service span affects the variety of travel options passengers can choose to take. Routes with similar network roles should have similar spans in order to facilitate travel throughout the SunLine network. For both frequency and span, it is important to balance convenience for passengers with funding and resource constraints.

Below are the minimum service frequencies and spans considered sustainable with funding level increases expected for SunLine in the next two to five years. Services in each service type can operate more frequently or longer hours but should not operate less frequently or fewer hours than the minimum standard.

Table 1- Frequency and Span by Service Type	Frequency of Service		Span of Service	
	Weekday	Weekend	Weekday	Weekend
Trunk Routes	20/30 minutes	30 minutes	5:00 AM – 11:00 PM	5:00 AM – 11:00 PM
Local Routes	30/60 minutes	60 minutes	5:00 AM – 7:00 PM	9:00 AM – 6:00 PM
Regional Service	Based on demand	Based on demand	Based on demand	Based on demand

These are minimum standards established by SunLine and can be revised where sustainable (i.e., where demand warrants, performance measures can still be met, and increased funding can maintain operation). Desired performance goals are outlined in Section 4.

Stop Spacing Standard

The Stop Spacing Standard involves the distance between bus stops and where stops should be located. This involves balancing access to service while minimizing delay. Industry wisdom argues too many stops results in fewer riders because faster service operations is more important than minimizing walking distances. Adding stops slows down a route, making it less attractive to passengers. In some cases, a stop may need to be

skipped (e.g. empty land with no development) or added (e.g. special customer access need or key destination).

SunLine has an established 0.5-mile target average stop spacing for all routes. Individual stop spacing can be varied based on local conditions with the average spacing target in mind.

Route Spacing Standard

Route spacing of at least one mile between parallel routes is considered essential for more sustainable service. Every effort is also made to avoid unproductive duplication of routes, as well as to avoid unproductive areas such as vacant land, gated resorts, and residential communities.

Route Alignment Standard

SunLine fixed route lines should be designed to provide service using direct pathways to varying origins and destinations; out-of-direction movements should be minimized. Direct service is more efficient; therefore, increases in fare revenue can be anticipated while operating costs are minimized.

Deviations resulting in indirect alignments which serve high volumes of passengers may occasionally be warranted. The impact to riders on the bus should be no more than five minutes per boarding gained on the deviation. The formula for calculating this impact is below:

$$\frac{(Passenger\ Load) * (Time\ of\ Deviation)}{Boardings\ Gained\ Along\ Deviation} \leq 5$$

For example, if a proposed deviation to a housing development would add 6 minutes in running time to a route, generate 40 new passenger boardings, and force 30 current riders to ride through the deviation, the time impact to current riders per boarding gained would be 4.5 minutes. Since this is less than 5 minutes, this deviation would be justified.

$$\frac{30\ current\ riders * 6\ minutes}{40\ new\ riders} = 4.5 < 5$$

There may be times where route deviations are warranted due to construction, special events, and/or inclement weather. These deviations are not subject to the same five-minute rule because they are temporary and often unavoidable.

Connectivity Standard

Existing service frequencies are reflective of service demand, but also are based on operating realities such as how long it consistently takes for a bus to make a round trip on a route. This mixture of service frequencies defines the experience when customers must connect between two routes.

SunLine will prioritize matching frequencies based on clock-face frequencies of 15, 30, and 60 minutes to facilitate connections between services. Having consistent intervals between trips on all services allows SunLine to schedule reliable transfers and makes the schedules easier to remember.

Stop Amenities Standard

SunLine provides amenities (a bench and waste container) at all stops where a sidewalk exists (and sufficient space is available).

All stops with at least 10 average daily passenger boardings should have a shelter installed, unless prevented by local conditions (such as available space or design issues, as determined in consultation with each city or the county).

New bus stops will be installed as mandated by ADA guidelines. As funding permits, the agency will upgrade existing stops to meet the standards set forth by ADA.

2.2 Service Performance Standards

Key Performance Indicators (KPI) are used across the industry to measure, evaluate, and compare transit service performance. The following KPI is recommended for measuring the performance of SunLine's service:

- Passengers per Revenue Hour

SunLine should regularly review service performance against service KPIs to better match service demand and supply within the financial and operational capacities of the agency. The KPIs are discussed in more detail below.

Passengers per Revenue Hour: This KPI measures service effectiveness or productivity based on ridership (passenger boardings) generated for each revenue hour of service operated (PPRH).

$$\frac{\text{Passenger Boardings}}{\text{Revenue Hours}}$$

The minimum performance expectations for each service tier is shown in Table 4 below. These KPIs are based on past performance and minimum standards set by peer agencies. SunLine's service area reflects both urban and rural characteristics. Rural population density is associated with lower ridership. Customer surveys reveal that 85% of SunLine's riders are transit dependent. Accordingly, some transit routes experience low performance, but are continued to support mobility in the Coachella Valley.

Routes performing at or above 125% of their service classification target will be candidates for increased investment while routes performing at or below 75% will be subject to corrective action. These options will be discussed in more detail later in this document.

Table 2	PPRH Standard
Trunk Routes – Routes 14, 30, and 111	20 passengers per hour
Local Routes – Routes 15, 20-Express, 21, 24, 32, 54, 70, 80, 81, 90, 91, 95 and Palm Springs BUZZ	10 passengers per hour
Regional Service – Link 220	10 passengers per trip

2.3 Service Quality Standards

Service quality standards contribute to the reliability and consistency of the delivery of transit service. While riders are attracted to transit service based on frequency and span, they continue to use services because they can reliably get to their destinations on-time. Unreliable service often results in decreased ridership. Service quality standards are proposed to be measured using the following operational and passenger experience metrics:

- Service Scheduled Speed
- On-Time Performance (service reliability)
- Percent Service Delivered (service reliability)
- Miles between Service Interruption (service reliability)
- Load Standards (service comfort)
- Average fleet age (service comfort)
- Bus deployment policy

Each suggested metric is discussed in more detail below.

Service Scheduled Speed: Measures a routes scheduled service speed. The measure is calculated by dividing scheduled revenue hours by revenue miles for each route. This KPI monitors services needed to maintain reasonable speed to retain and grow ridership.

Table 3 below shows target performance for SunLine’s transit system. SunLine’s schedule average service speed standard is 12.5 miles per hour (MPH). It operates in a relatively uncongested environment, and this speed is expected to be maintained.

Through significant efforts to optimize existing operations with better service frequencies and removing causes of delay, bus service scheduled speeds may increase. This measure will require ongoing improvement over time to maintain and improve performance.

Table 3 – Service Scheduled Speed	Service Speed - Weekdays	Service Speed - Weekends
Service Mode		

Fixed-Route Bus	12.5 MPH	12.5 MPH
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On-Time Performance: This KPI measures service reliability as defined by adherence to the published service schedule. “On-time” is when a trip departs a time-point within a range of zero minutes early to four minutes late. In order to achieve targeted on-time performance, service running times need to be calibrated regularly based on existing conditions. SunLine has a relatively uncongested operating environment, which helps support a high KPI for on-time performance. The on-time performance target is 85% for all services.

The biggest impact for on-time performance is route detours. The target of 85% is consistent with those adopted by peer systems with automated measuring tools (automatic vehicle location (AVL) equipment).

Table 4 – On-Time Performance	On-Time Performance Standard
Service Mode	
Fixed Route Bus	85% (excepting major detours)

Percent Service Completed: This KPI measures service reliability as defined by percentage of trips completed daily. There are three components necessary in order to measure completed trips:

- 100 percent daily availability of both operators and fleet to meet service demands
- Miles between service interruptions
- Timely response to service interruptions (less than half an hour)

The target is consistent with that adopted by peer systems.

Table 5 – Percentage of Service Completed	Service Completed Minimum Standard
Service Mode	
Fixed Route Bus	99%

Miles Between Service Interruptions: This KPI measures service reliability as defined by revenue miles between service interruptions, regardless of cause. SunLine’s standard is 5,000 miles. This measurement also includes bus exchanges where buses are swapped out in service though service is often not interrupted. To meet this standard, both avoidance of service interruptions through early identification (e.g., planning for detours, proper fleet maintenance, etc.) and timely as well as proactive response to service interruptions.

Table 6 – Miles Between Service Interruptions	
Service Mode	Target Minimum Miles Between Service Interruptions (Road Calls)
Fixed Route Bus	5,000

Load Standards: This service quality KPI establishes load standards for various vehicle types and is measured for each trip operated. While it may be acceptable for some riders to stand for short distances or time periods (e.g. under 2 miles and/or 10 minutes) during peak periods, it is generally accepted that seating should be available for all riders during normal off-peak conditions.

Table 7 – Load Standards	
Service Period	Maximum Consistent Load Factor
Peak	Average over 133% of seated load = 50 passengers
Off Peak	Average 100% of seated load = 38 passengers

Any vehicle operating at high speeds on highways (e.g., Routes 20-Express, 91, 95, and 220) requires all passengers to be seated, reducing the maximum load on these services to 100 percent of seated capacity.

Average Fleet Age: The age of the vehicle fleet affects performance and reliability of transit services as well as system attractiveness to customers. SunLine’s standard for average fleet age is no greater than 10 years. Adhering to the average fleet age standard will help ensure a reliable and comfortable passenger experience.

Table 8 - Vehicle Average Age	Average Fleet Age
Standard Transit Bus	No greater than 10 years

Bus Deployment Policy

Bus deployment specifies the type of vehicle that should be used to operate individual routes. The type of vehicle deployed on a route depends primarily on ridership demand and trip loads. Using incorrectly sized vehicles on routes can unnecessarily add operating cost to a route or result in overcrowding issues.

Trunk Routes 14, 30, and 111 should utilize 40-foot buses due to high passenger volumes/turnover, frequent stops, and route gradients in order to maintain reliable and on-time service.

Local Routes should use either 40-foot or 32-foot buses based on ridership demand. Routes with lower demand should use 32-foot buses to meet the demands of lower ridership and having fewer seats will not result in load or overcrowding issues.

Table 9 – Bus Deployment		Vehicle Type
Trunk Routes		40' buses
Local Routes	32' or 40' buses depending on ridership demand	
Regional Service		40' buses

SunLine will review the Bus Deployment Policy every two years beginning in 2018, and make necessary adjustments as the fleet is updated and to ensure compliance with Title VI requirements.

SunLine Transit Agency is in full compliance with Title VI of the Civil Rights Act of 1964 that protects people from discrimination based upon race, color, and national origin in programs and activities receiving federal financial assistance. SunLine insures equitable distribution of its assets in delivery of transit services to the people of Coachella Valley.

Buses are assigned according to successful completion maintenance functions without regard to route assignment, or vehicle age, except in size considerations as outlined above. Additionally, fuel cell and electric buses are assigned to routes with shorter distances and / or durations that are within acceptable range capacity of those vehicles.

Adequate number of buses are assigned to routes with high demand to avoid instances of overcrowding or passenger standees. All SunLine buses are fully air conditioned, and are 100% accessible to persons with disabilities.

2.4 Warrants Standards

Warrants Standards provide a way to determine which areas within the large service area will have both the passenger demand and performance potential to produce cost-effective fixed-route transit service. In order to ensure the financial sustainability of the agency, SunLine should only introduce new services that perform at or above the current system average. Planning new services around these guidelines will help ensure successful performance of new routes. Providing a set of guidelines for which areas warrant all-day fixed-route service will help SunLine respond to future community requests for new service.

Network Role

New services should be evaluated for their place in the overall transit network. Each new route in the network will have a unique role, whether it is facilitating transfers with existing services, introducing service coverage to a recent development, or providing connections between current routes and major destinations. While successful new routes connect with existing services, they should not duplicate existing service or compete for passengers.

Market Opportunities

There is a strong correlation between service performance, surrounding population and employment densities; the more people with access to a route, the higher the route's ridership. Population-dense areas tend to coincide with mixed-use neighborhoods, walkable environments and higher populations of transit-friendly constituencies such as students, seniors, zero-vehicle households, and low-income populations.

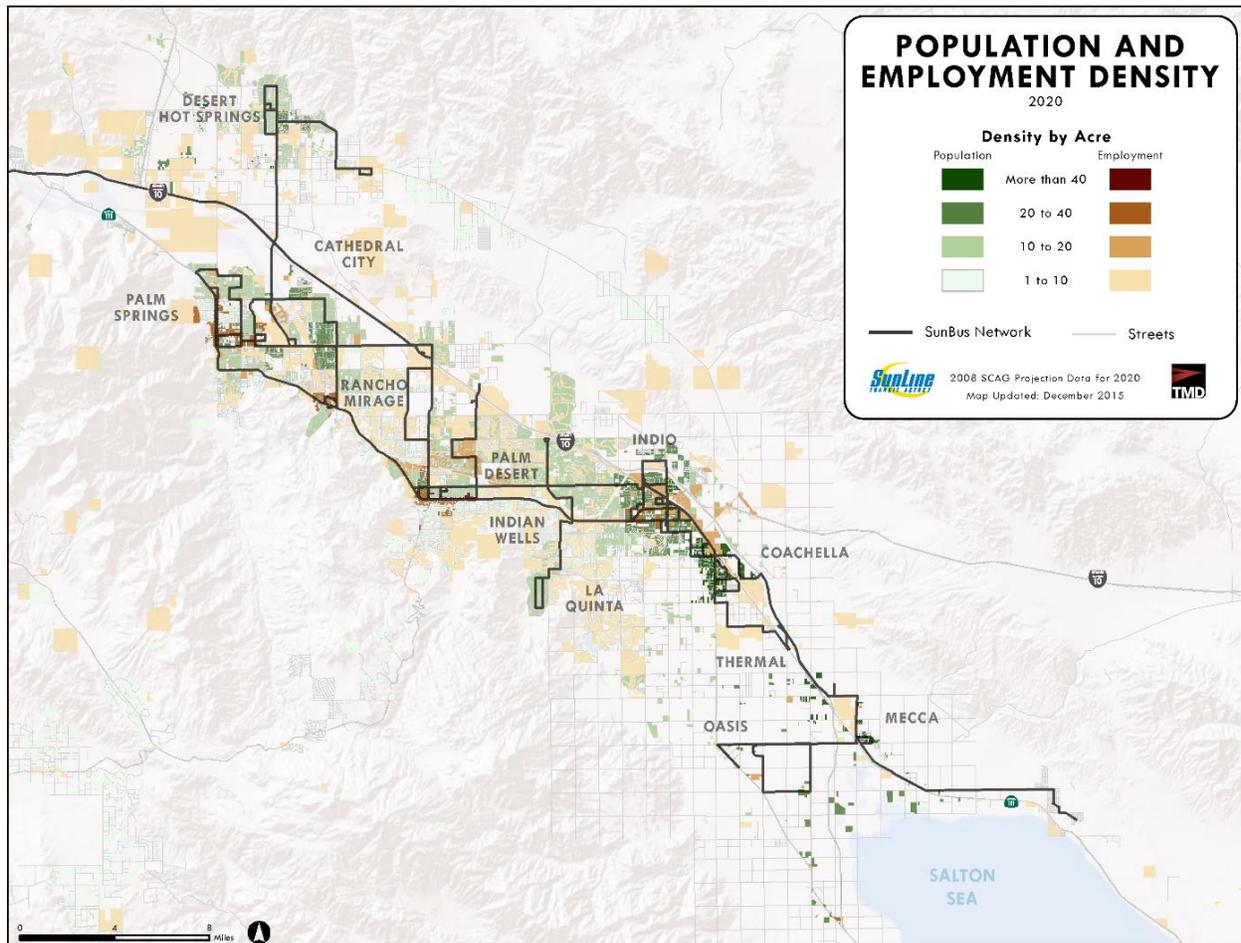
The minimum population and employment density for the introduction of new all-day fixed route transit service is an average of 10 people/jobs per acre within a half mile of the proposed route.

$$\frac{\textit{Sum of population and jobs within}\frac{1}{2}\textit{mile of route}}{\textit{Sum of population and employment acres within}\frac{1}{2}\textit{mile of route}} \geq 10$$

At densities over this minimum threshold, transit has the opportunity to play a meaningful role in public mobility. Areas with densities below this minimum threshold are not considered supportive of fixed route service and should not be subjected to further analysis. Areas in this category that have unmet needs may be served by alternative options to fixed route service.

Unmet Mobility Needs

SunLine should strongly consider the mobility needs of transit dependent populations when evaluating where to operate service. In assessing the area's demand for transit service, it is important to examine the presence of these demographic groups and identify any present unmet needs.



Key Destinations

Key destinations likely to generate higher demand for transit service include major area school, colleges, universities, hospitals, retail/commercial/entertainment centers with more than 10 people/jobs per acre, and open residential communities (not gated) to those with relatively lower income and vehicle ownership levels.

Evaluating New Services

New services should be implemented on weekdays only and operate between 6:00 AM and 7:00 PM. Once a new route has been implemented, it should be closely monitored to determine whether it is reaching its desired performance standards. The route should first be evaluated after six months to determine whether it meets more than two-thirds (2/3) of its performance standards. New services not meeting the minimum standards at the end of an 18-24-month trial period are subject to corrective action or discontinuation.

In some cases, trial periods for new services may vary based on the requirements of grant funding. For example, if a grant provided three years of funding for a route that did not meet standards, this route would still be operated for the full three-year period.

3. Major Service Change

According to the provisions of the Title VI, (FTA C4702.1B), no person in the United States shall, on the grounds of race, color, or national origin, be excluded from, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

To comply with FTA C 4702.1B, SunLine has implemented the following policy regarding the Title VI Analysis of proposed impacted routes and/or schedule changes prior to the implementation of any significant service changes or fare increases.

A mandated service change occurs no more than three times a year, unless necessitated by service adjustments and/or other operational requirements. A major service change is defined by SunLine as any permanent service change (6 months or longer duration) of 25% or more in revenue hours and/or revenue miles, span of service, or alignment miles for a given route or the network overall for any day type (weekday, Saturday, Sunday, and Holiday). Such changes require a public hearing and SunLine Board approval before implementation.

Under Title VI requirements, SunLine also identifies a Disparate Impact Policy and Disproportionate Burden Policy to ensure low-income and minority populations are not adversely affected by service changes.

- Disparate Impact Policy: A disparate impact occurs when the impact of proposed service or fare changes to minority populations is 20% greater than the impact to non-minority populations.
- Disproportionate Burden Policy: A disproportionate burden occurs when the impact of proposed service or fare changes to low-income populations is 20% greater than the impact to non-low-income populations.

4. Reporting and Management

To monitor KPIs adequately, data will be reviewed monthly or quarterly, as most appropriate. The Board of Directors will receive an annual performance report in December.

All services will be monitored for adherence to the productivity, farebox recovery, subsidy per passenger and are divided into three tiers based on performance:

- High-performing service: performs at or above 125% of the tier productivity standard
- Average-performing service: performs between 76%-124% of the tier productivity standard
- Low-performing service: performs at or below 75% of the tier productivity standard

High-Performing Service - Green (125% or higher of tier standard)

Routes with high performance suggest the need for greater investment, as high performance may signal the presence of significant latent demand. This category of

services constitutes the top-performing tier of the entire SunLine system. It is very important to maintain a high-quality level of service as well as to continue further investment. Creating standards for high-performing service prioritizes investment in the core system. Upgrading high-performing routes directs investment where it will be most effective.

The primary form of investment is in service frequency. Increasing frequency will prevent overcrowding on popular routes and make the service more attractive to a wider pool of potential customers. It will make the service more convenient for both current and future riders. Another investment is providing enhanced high-quality features along the route. Bus bulbs, bus-only lanes, and transit signal priority are all methods for decreasing delay and travel time along a route and improving the customer experience. Upgrading amenities at bus stops also makes services more attractive to riders and enhances the branding of SunLine services. All of these investments make buses more competitive with automobile travel.

Average-Performing Services- Yellow (76%-124% of tier standard)

Services in this category are adequately fulfilling their roles in the transit network, and no corrective action is required. These routes will be monitored on an ongoing basis to determine how their performance changes over time. While Green tier services should be prioritized for service investment, the same investment strategies can be applied to the Yellow tier services to improve system performance.

Low-Performing Services - Red (75% or below of tier standard)

Low-performing services indicate ridership demand is not high enough to justify the amount of resources being invested. Since SunLine works within the constraints of limited resources, it is important the use of each route is being maximized. Corrective Action Plans for low-performing services are designed to help improve performance to justify the level of resource investment. For productivity, routes will be considered to be “low-performing” if it does not reach 75% of the performance target for its tier. For the farebox and subsidy standards, the route must exceed the minimum threshold.

Corrective Action Plan

The *Corrective Action Plan* will examine the routing, schedule, route segments, and span of service in order to diagnose weaknesses in the route’s current operations. Using the information gathered, SunLine will develop a *Corrective Action Plan* for improving performance which will be implemented in the next feasible service change given the limitations in place regarding public process, public hearing (if required), and annual service change calendar. Areas of consideration follow:

- Segment-Level Analysis: A segment-level analysis may highlight a specific portion of the route that limits overall performance, causing it to perform below the standard for its tier. If a low-performing segment is identified, it can be modified in an attempt to raise the productivity of the route as a whole.

- Operational Analysis: Realigning service to cover only critical segments or eliminating unnecessary delay (e.g. deviations) are ways to reduce travel time and save resources, thereby raising performance levels while retaining ridership.
- Change in Service Levels: Adjusting the service levels of a low-performing route (e.g. by any combination of frequency, span, or day of week changes) may help tailor the transit product to its market, and subsequently increase productivity.
- Cost-Sharing: Exploring cost-sharing or public-private partnerships can reduce the amount of subsidy required to operate low-performing services. This is applicable for services that do not meet minimum performance standards yet serve a need identified by businesses, schools, attractions, or other organizations that may be willing to assist with funding operations in order to continue service.
- Targeted Marketing: Marketing tactics can help raise the public awareness of a service in need of improvement. Poor ridership may be a result of a lack of public knowledge of a route and investing in marketing can help reverse this trend. This is especially the case for targeted market groups like employment centers, shopping districts, schools, hospital, agencies, and other major destinations.
- Rider Outreach: Onboard surveys and rider interviews are methods for gaining valuable information on how a route can be improved. These methods can reveal information about popular destinations that a route may bypass or other aspects of a service that may be holding back ridership growth.

Consequences/Outcomes

Once a *Corrective Action Plan* is implemented the route must exceed “low-performing” in two of the three performance metrics for at least one quarter within the first three successive quarters or face further action which may include route elimination. If a route meets the expectations, the process of the *Corrective Action Plan* will be deemed concluded. Subsequent low performance will be reviewed as a new event.

In the event the corrective actions are unsuccessful in raising at least two of the metrics (productivity, farebox recovery, or subsidy per passenger) to above “low-performing” after six consecutive quarters, discontinuation may be necessary to ensure effective use of agency resources.

SunLine Transit Agency reserves the right to periodically review and revise the Service Standards Policy. Comments and suggestions are welcome by contacting SunLine Customer Service on 1-800-347-8628, 8:00 a.m. to 5:00 p.m., weekdays, or via email at www.sunline.org/customer.

Approved:



Lauren Skiver
CEO/ General Manager

FY 2020-2023 TITLE VI PLAN

APPENDIX 4:

- FTA CIVIL RIGHTS ASSURANCE
(TITLE VI)



FEDERAL TRANSIT ADMINISTRATION CIVIL RIGHTS ASSURANCE

A signed Federal Transit Administration (FTA) Civil Rights Assurance that all of the records and other information required under FTA Circular 4702.1B have been or will be compiled, as appropriate.

FEDERAL TRANSIT ADMINISTRATION

CIVIL RIGHTS ASSURANCE

The SunLine Transit Agency (SunLine) HEREBY CERTIFIES THAT, as a condition for receiving Federal financial assistance under the Federal Transit Administration Act of 1964, as amended, it will ensure that:

1. No person on the basis of race, color, or national origin will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.
2. The SunLine Transit Agency will compile, maintain, and submit in a timely manner Title VI information required by FTA Circular 4702.1B and in compliance with the Department of Transportation's Title VI regulation, 49 CFR Part 21.9.
3. The SunLine Transit Agency will make it known to the public any person or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

The person or persons whose signature appears below are authorized to sign this assurance on behalf of the grant applicant or recipient.

Lauren Skiver, CEO/General Manager

DATE

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FY 2020-2023 TITLE VI PLAN

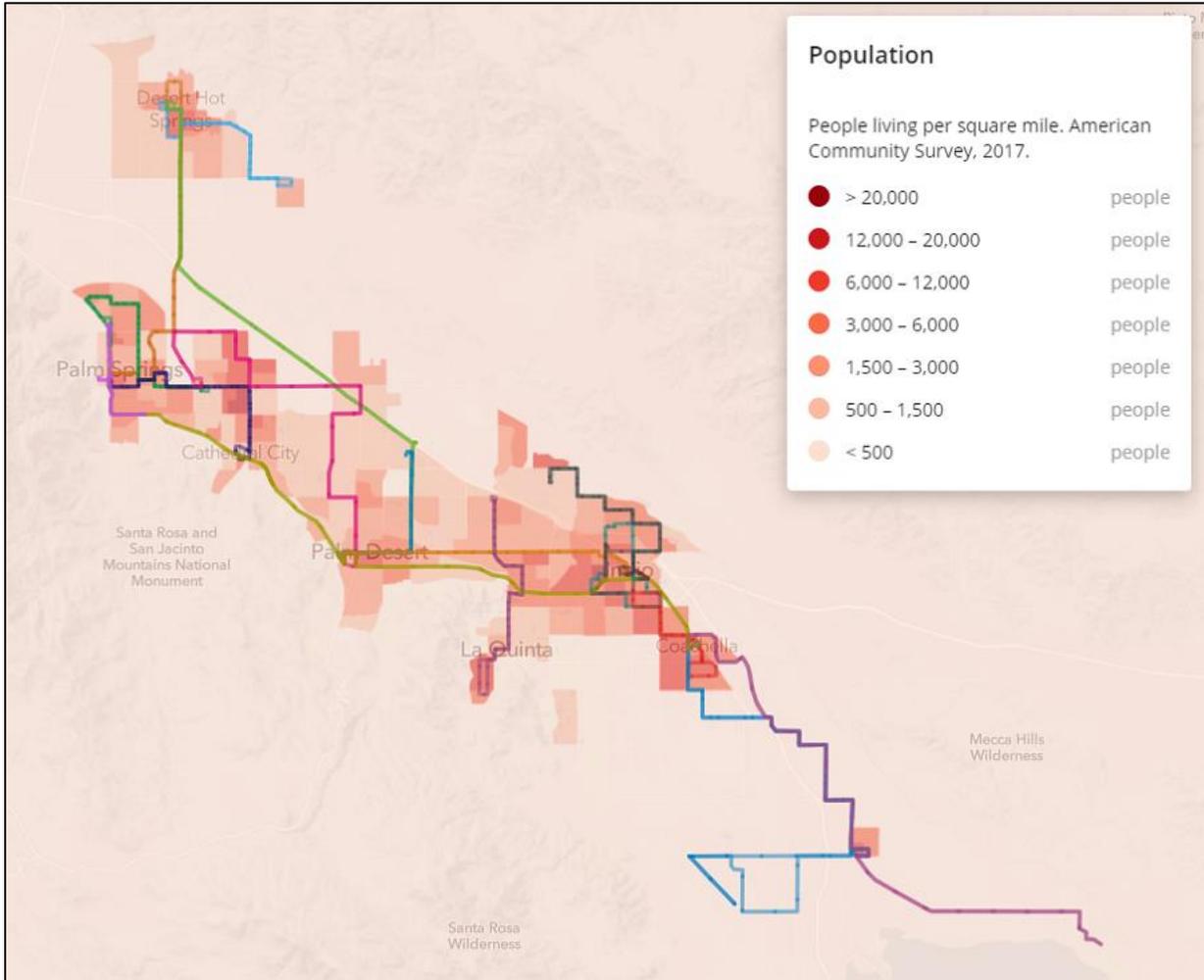
APPENDIX 5:

- TITLE VI CENSUS DATA ANALYSIS
(2017 American Community Survey)

System Population:

Map 1 below provides population density data based on 2017 American Community Survey data.

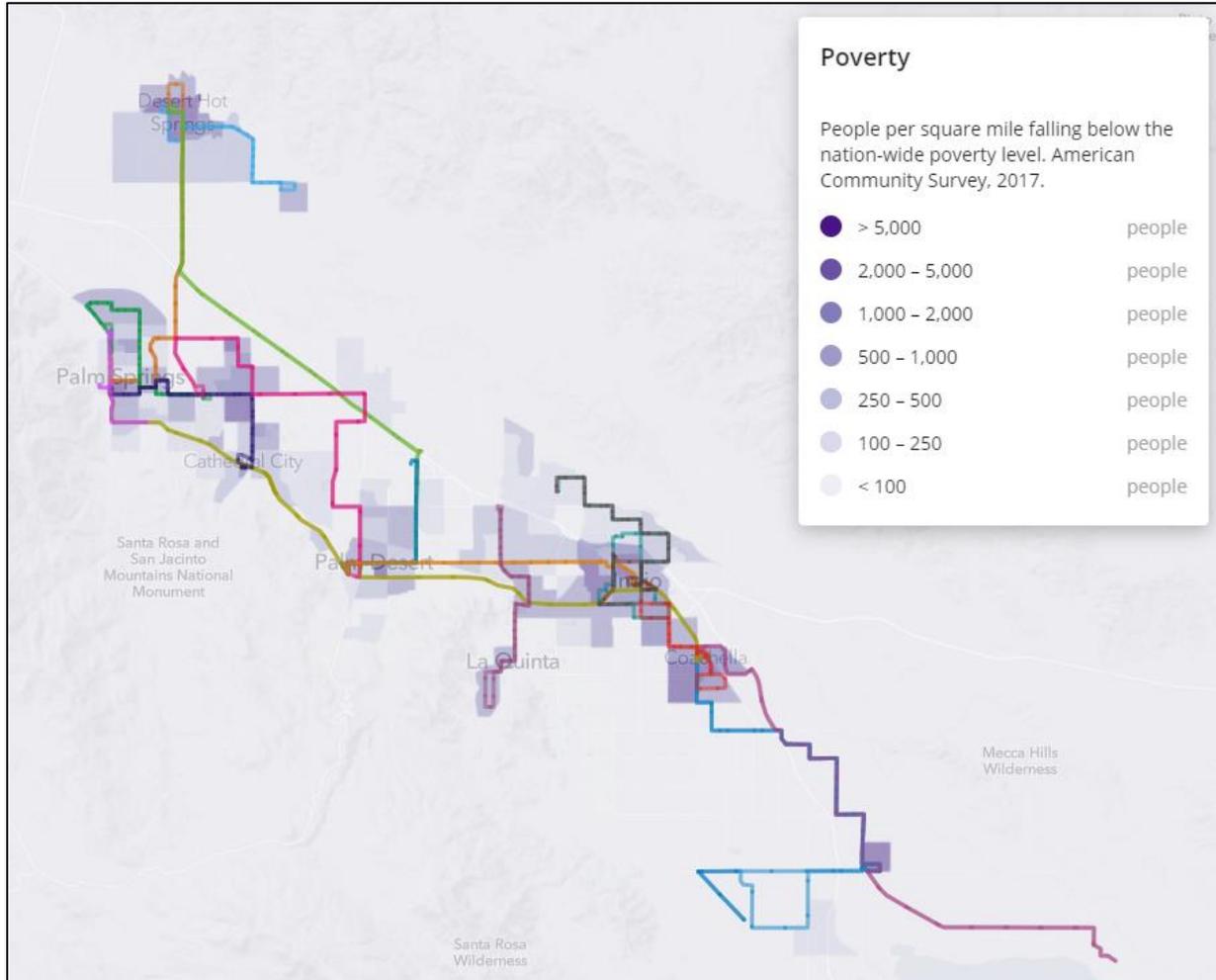
MAP 1 – SUNLINE SERVICE AREA – POPULATION DENSITY



Low Income Population:

Map 2 below provides poverty density data based on 2017 American Community Survey data.

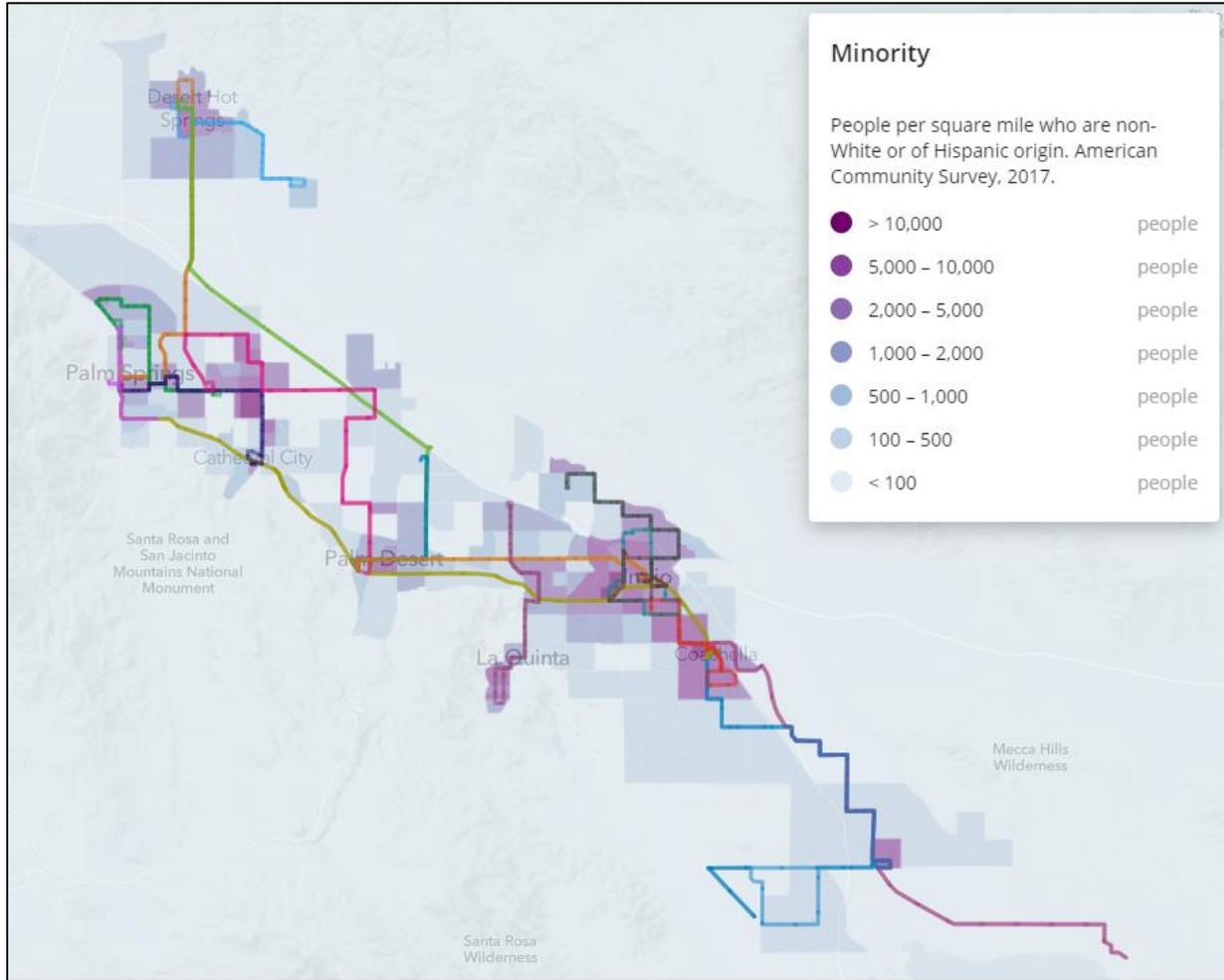
MAP 2 – SUNLINE SERVICE AREA – POVERTY POPULATION



Minority Population:

Map 3 below provides minority density data based on 2017 American Community Survey data.

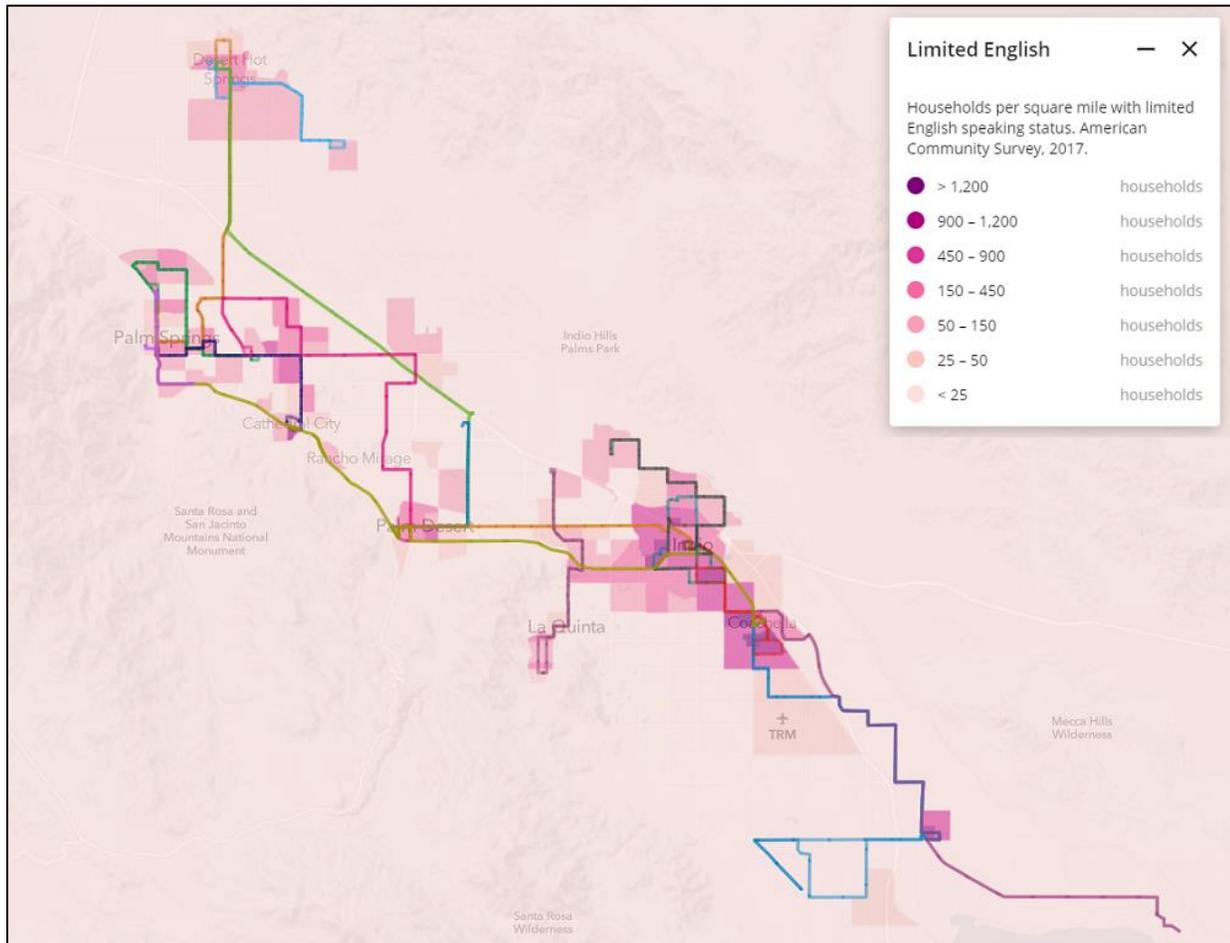
MAP 3 – SUNLINE SERVICE AREA – MINORITY POPULATION



Limited English Population:

Map 4 below provides limited English population density data based on 2017 American Community Survey data.

MAP 4 – SUNLINE SERVICE AREA – LIMITED ENGLISH POPULATION



FY 2020-2023 TITLE VI PLAN

APPENDIX 6:

- ACCESS COMMITTEE ROSTER
- PUBLIC HEARING SUMMARIES

**SUNLINE TRANSIT AGENCY
ACCESS COMMITTEE ROSTER 2019**

Last Name	First Name	Job Title	Company	Ethnicity	Term End
Chapell	Angelica	Senior/Low Vision Advocate	Community Access Center	Hispanic/Latino	6/1/2020
Janesin	Mario (Chair)	System Change Advocate/ Community Organizer	Community Access Center	White/Caucasian	6/1/2020
Jessie	Byron	Owner	Prowatch Caregivers	Black/African American	6/1/2020
Johnson	Sarah	Volunteer Coordinator	Neuro Vitality Center	White/Caucasian	6/1/2021
Lester	Lisa	Consumer Development Coordinator	Desert Arc	White/Caucasian	6/1/2020
Delgadillo	Janie	Staff Services Mgr.	Department of Rehabilitation	Hispanic/Latino	6/30/2020
Samulski	Linda (Vice-Chair)	Para Bus Rider	Guide Dogs of the Desert	White/Caucasian	6/1/2020
Foots-Rachal	Tamica	Regional Manager	State Council on Developmental Diabetes	Black/African American	6/30/2020
Schon	Joan	Fixed Route/ Para Bus Rider		White/Caucasian	6/30/2020
Stewart	Amy	Fixed Route/ Para Bus Rider		White/Caucasian	6/30/2020
Babcock	Robert	Para Bus Rider	Desert Arc. Self-Advocacy Council	Hispanic/Latino	6/30/2020
Allan	Ronald	Para Bus Rider		White/Caucasian	6/30/2021
Cecelia	Ibarra	Orientation & Mobility Specialist	Braille Institute	Hispanic/Latino	6/30/2021



July 22, 2016

SunLine Transit Agency held four (4) public hearings for the purpose of receiving public comments on the proposed service changes in Fiscal Year 2016/17. The hearings were held on the following locations and days:

- *SunLine Transit Agency ~ Tuesday, July 5, 2016 10:00 a.m. to 11:00 a.m.
32-505 Harry Oliver Trail, Thousand Palms 6:00 p.m. to 7:00 p.m.*
- *SunLine Transit Agency Thursday ~ July 7, 2016 10:00 a.m. to 11:00 a.m.
83255 CA-111, Indio 6:00 p.m. to 7:00 p.m.*

The following is a summary of public comments received by Friday, July 8th, 2016:

DIRECT PHONE CALLS RECIEVED:

- ***Tuesday, June 7th, 2016*** – Rider ~ Requesting service to Mission Lakes Boulevard at Little Morongo Road.
- ***Wednesday, June 8th, 2016*** – Rider ~ Requesting service to Mission Lakes Boulevard at Little Morongo Road.

CORRESPONDENCE RECIEVED:

- ***Sunday, April 29th, 2016*** – San Bernardino Regional Manager of California State Council on Developmental Disabilities ~ sent a letter supporting the efforts of self-advocates and community-based organizations as they seek the revision of the existing bus route Line 53 to service 73000-73300 block on Country Club Drive in Palm Desert.
- ***Thursday, June 21st, 2016*** – , Fixed Route Rider ~ sent a letter requesting SunLine to keep Line 53 service on Hovley Lane E. between Portola Avenue and Cook Street at the U.S. Post Office. Once the San Pablo roundabout is constructed, she feels Line 53 should continue to operate on San Pablo Avenue between Highway 111 and Fred Waring Drive.
- ***Thursday, July 7th, 2016*** –President & CEO of Desert Arc ~ sent letter requesting service to be reestablished back on Country Club Drive between Monterey Avenue and Portola Avenue in front of the Desert Arc by reconfiguring Line 53.
- ***Thursday, July 7th, 2016*** – Fixed Route Rider ~ sent letter requesting SunLine to take back its bus stop locations so passengers feel safe again. The bus stops have gotten worse with the homeless

situation. The alcohol and drug problem has gotten worse and the prostitution and violence. She wants to know if there is a solution.

CUSTOMER SERVICE DESK REPORTS CALLS RECIEVED:

- **Saturday, June 25th, 2016** ~ Rider called in a request for service in her area at 64-625 Pierson Boulevard close to Little Morongo Road in Desert Hot Springs
- **Saturday, June 25th, 2016** ~ Rider called requesting later service on Lines 70 and 53 for those who work later shifts and need to get home.
- **Tuesday, June 14th, 2016** ~ Rider called requesting bus shelters at bus stops #445 on Bob Hope Drive at Via Marta and #442 on Bob Hope Drive at Ginger Rogers Road adjacent to the medical facilities in the City of Rancho Mirage.

PUBLIC MEETING COMMENTS RECIEVED:

1st Public Meeting on Tuesday, July 5th, 2016 at 10:00 a.m. there were no attendees:

- No comments.

2nd Public Meeting on Tuesday, July 5th, 2016 at 6:00 p.m. there were two (2) attendees and the following comments were provided:

Speaker #1 ~

- Requesting a better connection between Lines 14 and 20. He is requesting that the last Line 20 from Palm Desert to Desert Hot Springs to connect with the Line 14 at Palm Drive at Two Bunch Palms. He would like the 6:59 p.m. Line 14 to stay an extra five (5) minutes to connect with Line 20.

Speaker #2 ~

- Is requesting more bus stops on Lines 91 and 95 because these are long routes and the existing stops are so far apart. She feels if there were more stops there would be more riders.
- She would like to see a new bus stop on the north side on Airport Boulevard west of Bucannon. She was not clear on where stops were needed.
- She is requesting a new route that travels straight down Harrison Street to Oasis and end point at Mecca Library.
- Also requesting a bus stop for the new Line 92 at the newly constructed park Rancho Las Flores on Van Buren Street between Avenue 48 and Avenue 49 in Coachella.

3rd Public Meeting on Thursday, July 7th, 2016 at 10:00 p.m. there was one (1) attendee and the following comments were provided:

Speaker #1 ~

- States she lives in Thermal and would like to see a turnout constructed and the stop reinstated on the north side of Airport Boulevard west of 86S/Cactus. The response was, she was correct

there is no turnout on the north side of Airport at 86S/Cactus and SunLine needs to work with Caltrans and the County regarding this.

- She likes the idea of Line 70 going North of the 1-10 to serve the county building off La Montanas road in Bermuda Dunes.
- also stated there is a woman that lives in an apartment complex in the low income housing on Polk, who is circulating a petition to keep the line 91 on current route instead of going back to the regular route. There are a lot of people low income folks and elderly that live in that area and benefit with the current route. SunLine has not received any information regarding this and asked Ms. Perez to get the woman to attend the public meeting at 6:00 p.m. or have her call the Planning Department to have her comments heard regarding this matter.

4th Public Meeting on Thursday, July 7th, 2016 at 6:00 p.m. there were two (2) attendees and the following comments were provided:

Speaker #1 ~

- Request for more frequency on Line 95 and feels the trip times are too far apart.
- She is working with Communities from Avenue 71 to Avenue 76 in Oasis. She did a survey to see how many trailer parks were around these areas and found 5,000 residents and 71 to 80 families that do not have public transportation services. They created their own proposed route alignment with three stops at Mountain View Estates, Avenue 76 Desert Parks and Recreation (accessible to 20 thousand people), and Avenue 81 for residents who live all the way out there. (see attached maps). They feel these residents would generate a lot of ridership and it would benefit the communities, especially college students who need jobs. There were 381 students that graduated from Desert Mirage High School and only 56 are eligible to go to college. The other 320 will be working in the fields when they could be working in air conditioning and putting their high school diplomas to work.
- She stated if SunLine was unable to install a bus stop on the south side of Avenue 66 east of Expressway 86, could buses travel through the Travel Center on the northeast corner of Avenue 66 at Expressway 86? The response was the location is private property and due to the high volume of diesel trucks traveling in this area it would be a liability. It has been a long ongoing request to have a stop installed on the south side of Avenue 66 east of Expressway 86. This location is within the Caltrans right-of-way, so when SunLine request to install a bus stop, Caltrans denied the request due to safety reasons.

Speaker #2 ~

- Is requesting closer service (Line 80) to the Walmart located on the southeast corner of Monroe Street at Avenue 44, and would like Line 80 to travel on the shopping center property to pick up and drop off passengers.
- He is also requesting a bus shelter at bus stop #531 on the southwest corner of Jackson Street at Avenue 44 served by Line 80. It was explained that there are plans to install a bus shelter at bus stop #531.

- He is also requesting that SunLine reinstall the bus stop on Requa Avenue at Forest Lawn. It was also explained the stop was removed because it was not ADA accessible, having the bus reinstalled will be explored.
- He would also like to see newer buses on Lines 80 and 81 routes.
- Request SunLine to adjust the Commuter Link 220 schedule so he can use the service. It was explained that we are looking at options of adjusting the schedule.

“Rethink Transit” PUBLIC COMMENTS Mach 6th thru 8th, 2018

Public Hearing #1

Palm Desert Library

73-300 Fred Waring Drive

Palm Desert, Ca 92260

Wednesday, March 7th, 2018 10:00 a.m. to 11:00 a.m.

Open public hearing at 10:14 a.m.

Speaker #1

Comment 1: The starting time for the Line 21 is very inconvenient for me. I can't believe it's so late. I've never seen that on any other line and I've been taking the bus for about four years. It starts at eleven. And I have meetings on Cook Street at ten, so I have to find another way. Is requesting earlier service on Line 21.

Comment 2: Feels a half an hour wait is nothing, but an hour wait is something. Such good news about the Line 80!

Speaker #2

Comment 1: Line 80 is it going to be temporary is it for one year? Will it include service to the Polo grounds on Avenue 52 or Avenue 50? There is a lot of people during the Polo season. I don't think during the concert series that they would need the bus, but maybe people who prefer riding the bus could attend those concerts. Drop site or something.

Comment 2: Is happy for the changes to Line 80 with closer service to the Walmart center on Avenue 42 and Monroe. That is her only concern.

Close public hearing at 10:23 a.m.

Public Hearing #2

Palm Desert Library

73-300 Fred Waring Drive

Palm Desert, Ca 92260

Wednesday, March 7th, 2018 6:00 p.m. to 7:00 p.m.

No Comments.

Public Hearing #3

Mizell Senior Center

480 S. Sunrise Way

Palm Springs, CA 92262

Thursday, March 8th, 2018 10:00 a.m. to 11:00 a.m.

Open public hearing at 10:10 a.m.

Speaker #1 ~

Comment 1: I don't have any comments regarding the proposed changes to Line 80. But I am sure people would be please to know that the time has been cut in half.

Comment 2: I have a comment regarding the interline on the weekend on the Line 24 and 32. I am wondering why you can't put on the schedule stops on the Home Depot side or leaves from the Home Depot side, or leaves from the Walmart side. Because many drivers don't know that they're supposed to leave from Walmart. So I have missed with two heavy bags of groceries a bus, because it left over there when I was waiting over at Walmart. So I have to wait another hour and then to be on the safe side, I decide I better go over there anyway because I can very likely run into someone else who didn't know they were supposed to be leaving. But if you could put on the schedule. If you put north or south people aren't going to know. But if you put leaves from Walmart side or leaves from Home Depot that should be clear to everybody.

Comment 3: When I moved here thirteen years ago the schedules were much more lengthy then they are now. The Line 24 only ran every 90-minutes. Line 111 was even 45 or an hour, so there has been a lot of improvements in time, on most of the routes affect me anyway. I appreciate that.

Speaker #2 ~

Comment 1: I have never been to a meeting, so I saw it on the billboard, so I wanted to see what it's all about, what's being discussed and suggestion that they would do. I thought it would be a bigger.

Staff member Response: Went over the presentation I will be happy to do the presentation again after those who have already seen the presentation have spoken first.

Comment 2: For the Line 24 he noticed they have a layover over there by the Walmart. It's about 20 to 25-minutes for a break. My thing was, why do they keep the Line 24 they use to be going on Farrell as suppose to the Line 30. And the Line 30 continue the same way like it used to be Ramon and Farrell, and turn as supposed to El Cielo as supposed to what it does now. Because

the Line 24 was covering that, it's only a matter of a few minutes in between. But I think the 24 will cover that very easily because it has such a layover on the other side.

Staff member Response: SunLine will keep in consideration when planning the service.

Speaker #2 ~

I thought when they did the realignment of the lines, when the 24 was already going there. With the Line 30, it seems that it takes a lot of their time. When they're doing changes to the Line 14. The drivers seem like they have 5 to 6-minutes delay between on line to the other line. To me it's like to me, they should have more time either realigning the line.

Staff member response: explained that they took into consideration of the Airport requesting more frequent service from public transportation, and now that we have court house open during the week. We have more people wanting to go to the court house, that were walking from Ramon Road. They are now getting dropped off on Tahquitz.

Speaker #2 ~ sees your point, because the Line 30 runs a little more frequent than the Line 24 and never realized that.

Staff member response: added that we also have the Oasis Health Care facility. We had a lot of people that go over to that area.

Speaker #2 ~ asked about Line 30 service on the weekend as supposed to every 40-minutes to every 30-minutes. Is there any chances in the future that it's going to change?

Staff member response: We will defiantly make sure that we take your comments to look into it.

Speaker #2: Takes that line the most I should say and it appears to me on the weekends there's not only the time consuming but also when the bus come, the people have been waiting for a long time. Again, I don't know your statistics or as far as the ridership for the line. But it appears to me that the Line 30 there is a lot of ridership on the weekends. It would be beneficial for all of us who ride the bus all the time, to be at least 30-minutes close to 40.

Staff member response: We will defiantly take that into consideration.

Speaker #2: One more thing before I forget. I noticed also the lines that I run, I don't go all the way to the valley but it was mentioned through other passengers that I talk to. Who maintains the shelters or the area at the bus stops?

Staff member response ~ SunLine staff does.

Speaker #2I don't know how frequently at night time they check the lighting system. But a lot of them are out.

Staff member response: We are working on improving the lights at the shelters.

Speaker #2: Last time I was waiting for the Line 111, right there by Target, and the one across the street was completely out. And about a month ago, the I was waiting at was out completely. As I was going along when I transferred to the Line 30. Riding along the Line 30, there is a lot of shelters with the lights out. Especially, when you're supposed to be standing where the driver

can see you, there is no light. I always have my phone with my flash light on so they can see me. When I'm waiting for the bus line. Obviously, because it's so dark here. Some people don't do this I guess they just get passed by because there is no way to see them. It pretty dark in there and for safety reasons also. I am thinking of the safety reason. I mean you have to wait another 30-minutes for the bus. That's kind of crucial, especially when you're at a transfer point and you're going to miss the last bus because you missed the other bus. It's a concern. Anyway that's all I needed to say.

Speaker #3 ~

Comment 1: Regarding Line 111 on weekdays. Wouldn't it be cost effective to eliminate the 902, because the 907 they have another that takes off 5-minutes later. So just eliminate the 902.

Staff member response: That is one of the corrections that we have done for the May 2018 service changes.

Comment 2: Will the Line 80 go right up to the door through the parking lot?

Staff member response: No, we're not allowed to get up to that close. It's private property.

Comment 3: Every time I see the Line 24 or if I take it, it waits on the Walmart side.

Close public hearing at 10:27 a.m.

Public Hearing #4

Mizell Senior Center

480 S. Sunrise Way

Palm Springs, CA 92262

Thursday, March 8th, 2018 6:00 p.m. to 7:00 p.m.

Open public hearing at 6:06 p.m.

Speaker #1

Comment 1: I am the new director of the palm springs campus of the college of the desert. My comment regarding Line 20. I already have spoken with one of your staff members. They have had already made corrections to Line 20. What was happening was our students in Desert Hot Springs were being late for class because they were waiting too long in the middle of it. Since I brought this to their attention they have already taken care of it. So I want to give them congrats about taking care of it. They will supposedly will be monitoring it over the next few weeks to make sure that it is happening. They think it is a driver issue or driver timing issue. I want to keep that at the for front. But I wanted to be here to represent those sixteen students that stated they had issue with that they were being late to class. I appreciate the way that you all take care of it. But I want to make sure we are serving our students. That way we all have a great relationship with you guys. Also, I want to make sure that anything that happens here because, to be honest, I don't know where all the bus stops on Baristo because we have our new campus, so making sure our students have access.

Staff member response: If I can provide a little more information. That is actually something that we were already working on before, the employee who received that call, I think was yesterday. Just for additional assistance, we believe Monterey operators, making sure they are leaving on time and making scheduled trips as well. You should also expect to see alerts for all students,

actually all individuals that are riding the Line 20. So there will be alerts going out tomorrow that will have all the stops available just so the public is aware which stops are serviced by that route. There will be a little information section on that as well.

Speaker #1 ~ I would appreciate your help on that.

Speaker #2

Comment 1: I live in Palm Springs and I have been taking the bus for eighteen months. We have lost our car, so everyone of the family members, my husband and two daughters. Who are thirty and twenty-three taking the bus. My husband has found that the signage of where the bus stops are is not very clear at times and he has had a driver tell him that the one 111 stops here at the very front, acting as if he should know it. But he wasn't sure and so the attitude and just trying to find the right place. We are trying to do the right thing and take the bus. But sometimes a little snippy ness is not called for. But pretty much up until January, you changed the bus schedule. I take the Line 30 to work at Avenida Caballeros and Ramon. You changed it from 7:35 to 7:40. I work from 8 to 4:30 and then you made the bus going home instead 4:43, you made it 4:38. So I am asked to stay five minutes later but I never make a bus before five o'clock, and a lot of times I am close, and I am waiting at Ramon to cross the highway. So I see a bus go by and I have to wait 20 to 25-minutes for another bus. And there are some cases, one day, which was before Valentine's Day. Where I saw the bus, waited at the light and never got the light, so the bus went by at 4:38 and I did not get on a bus until 5:15. Then the bus stop by the old Office Max and the drive go off and got on her phone for 10-minutes. Then she got back on and did the route and then across from the library. All of a sudden you see another bus. Then when she made the turn onto Ramon and Sunrise, she got off the bus again to inquire I guess with the driver who was standing there. And needless to say, I was standing at the bus stop from 4:38 or 4:39 and I did not get in my door, and I live only 8-minutes away from the bus stop. I got home at 6 o'clock and I was in tears. A lot of times I am in tears because I missed the bus by 1-minute or 2-minutes and it's because of this schedule. It seems that I have to be there at 4 and leave work at 4:30, which I can't because I don't get to work at 8 o'clock, and I never make it. So it's like waiting at the bus stop for 20 to 25-minutes almost every day. Pretty soon it's going to get warm, and I'm going to be sweating at the bus stop. So that's my problem there.

Comment 2: And the other thing is missing the bus is one thing. Okay, pretty soon I'll get home. But then the drivers, twice the first week of the change. I had two drivers think they were the Line 14 and made the right instead of the left at Baristo. And they didn't get to Alejo, and that day I didn't get home after 5:30. And then twice they've been able to correct themselves. And then twice last week, end of February . They did it again. So four times since the change through, I've had drivers no sure. As a matter of fact, last week we the drive wasn't able to correct himself. The bus said the Line 30, but the sign above him said Line 14. So he was making it correct way, but all of a sudden he look up and said "Am I wrong". Then as he was about to make the turn, we all yelled "No". So we have to keep an eye on the drivers. I am tempted to get a sign that says Line 30, you know, so that it reminds them. I've had three drivers make the error.

Close public hearing at 6:20 p.m.