



**GOLD COAST TRANSIT
TITLE VI - CIVIL RIGHTS PROGRAM
ASSESSMENT UPDATE
FOR
CAPITAL AND OPERATING ASSISTANCE**

**DRAFT DOCUMENT
PROPOSED
submission
May 3, 2013**

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TABLE OF CONTENTS

1.0	INTRODUCTION TO UPDATE	1
2.0	ACTIVE LAWSUITS OR COMPLAINTS	1
3.0	PENDING APPLICATIONS FOR FINANCIAL ASSISTANCE.....	1
4.0	MINORITY REPRESENTATION IN DECISION-MAKING BODIES	1
5.0	FTA CIVIL RIGHTS & DOT TITLE VI ASSURANCES	2
6.0	TITLE VI NOTICE TO THE PUBLIC	3
7.0	TITLE VI EQUITY ANALYSIS	7
8.0	SUBRECIPIENTS	7
9.0	MEANINGFUL ACCESS TO LEP PERSONS	7
10.0	PUBLIC PARTICIPATION PLAN	7
11.0	APPROVAL OF TITLE VI PLAN BY GOVERNING BODY	7
12.0	FIXED-ROUTE PROVIDER REQUIREMENTS	8
12.1	GCT Background	8
12.1.1	Services.....	8
12.1.2	GCT Facilities	8
12.1.3	GCT Fares.....	8
12.3	Service Standards and Policies.....	9
12.3.1	Vehicle Load.....	9
12.3.2	Vehicle Assignment.....	10
12.3.3	Vehicle Headway.....	11
12.3.4	Distribution of Transit Amenities	11
12.3.5	Transit Access	12

TABLES

TABLE 1 - Vehicle Load Factors	14
TABLE 2 - FY 2012/2013 Route Service Hours And Headways.....	15

APPENDICES

APPENDIX 1 - Limited English Proficiency (LEP) Analysis and Plan 17

APPENDIX 2 - GCT Goals, Objectives and Standards including Performance Indicators
and Evaluation Procedure..... 21

APPENDIX 3 - GCT Public Participation Plan. 24

APPENDIX 4 - Approval of Title VI Update By Governing Board Documentation 27

APPENDIX 5 - Printed Materials: Bus Book and New Route Information..... 32

1.0 INTRODUCTION TO UPDATE

This update to the Gold Coast Transit (GCT) Title VI report was developed pursuant to the revised procedures described in Federal Transit Administration (FTA) Circular 4702.1B, dated October 1, 2012. The previous report was submitted to FTA on June 30, 2010. The purpose of the update is to provide information to enable FTA to determine GCT is in compliance with the U.S. Department of Transportation (DOT) Title VI regulations (49 CFR Part 21). The update also includes information about GCT's language assistance measures to assure equal access for Limited English Proficient persons in the GCT service area.

2.0 ACTIVE LAWSUITS OR COMPLAINTS

Since the last report submittal in June 30, 2010, there has been no public transportation-related Title VI or civil rights investigations, complaints, or lawsuits filed against GCT on the basis of race, color, and/or national origin in transit-related activities and programs.

3.0 PENDING APPLICATIONS FOR FINANCIAL ASSISTANCE

GCT is a recipient of federal funding under Section 5307 of the FTA Act of 1964, as amended.

GCT's FY 2012/13 grant application for capital and operating funds was submitted July 12, 2012 and has been assigned FTA project number CA-90-Y965.

4.0 MINORITY REPRESENTATION IN DECISION-MAKING BODIES

The GCT Board of Directors is the decision making body for GCT. Board members are elected members of the city councils and county Board of Supervisors. One member from each jurisdiction is appointed by their respective councils/board to represent the city/county on the GCT Board. This enables representation of the individual geographical areas on the GCT Board. Appointments are generally based on the council/board member with the greatest interest in transit and not based on minority status. Currently the Board consists of one Hispanic male and four Caucasian males.

Additionally, GCT's Joint Powers Agreement provides for a weighted vote among Board members. The voting weight is based on a formula of the percent of fixed-route service miles provided within each jurisdiction and the percentage usage of paratransit by the jurisdiction's residents. A change in service affects the weight; generally the change is incremental from year to year. The voting weight for FY 2012/13 is: Ojai – 1.63%, Oxnard – 49.99%, Port Hueneme – 3.73%, Ventura – 32.30% and County – 12.35%. Oxnard is the most populated city in Ventura County, with the largest minority (Hispanic) populations.

The GCT Board of Directors directed the formation of a Technical Advisory Committee (TAC) in 1982 to serve in an advisory capacity to the Board of Directors. The Committee's mission is to provide advisory assistance and recommendations to the GCT Board and staff on technical and policy issues affecting the interests of member jurisdictions, and to serve as a communication liaison among jurisdictions and GCT. The TAC is comprised of staff members from each of GCT's five member jurisdictions who are appointed by the City Managers and the County of Ventura Public Works Director. The Ventura County Transportation Commission (VCTC) Executive Director designates staff to serve in an ex-officio capacity for the purpose of providing information on state and federal funding requirements and options, transportation and transit planning and other issues. GCT Planning staff provides staff assistance to the TAC. All six TAC members currently serving are Caucasian; two are female.

Non-Elected Committees	Number of Members	Minority	Non-Minority
Board of Directors	5	1	5
Technical Advisory Committee (TAC)	6	0	6

5.0 FTA CIVIL RIGHTS & DOT TITLE VI ASSURANCES

In accordance with 49 CFR Section 21.7(a), every GCT FTA grant application for financial assistance shall be accompanied by an assurance that GCT will operate in compliance with DOT's Title VI regulations. This requirement shall be fulfilled when GCT submits its annual certifications and assumptions to FTA.

6.0 TITLE VI NOTICE TO THE PUBLIC ASSURANCE

GCT is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended. GCT's Title VI notice to the public is posted in the following locations:

The notice is posted in the public lobby of the GCT Administration offices located at 301 E Third Street, Oxnard, CA 93030 in both English and Spanish.

The notice is posted in the public lobby of the GCT Customer Service offices located at the Oxnard Transit Center, 201 E Fourth Street, Oxnard, CA 93030 in both English and Spanish. The notice is posted in the public notices board at the Ventura Transit Center, 3400 Telegraph Road, Ventura, CA 93003 in both English and Spanish.

The notice is included on the GCT web site as well as in the Bus Book in both English and Spanish.

Title VI Notice to the Public

Gold Coast Transit (GCT) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended.

- No person or group of persons will be discriminated against with regard to fares, routing, scheduling, or quality of transportation service that GCT furnishes, on the basis of race, color, or national origin.
- Frequency of service, age and quality of vehicles assigned to routes, quality of bus stops and location of routes will not be determined on the basis of race, color or national origin.

In addition, GCT recognizes both California and federal laws which protect your civil rights. The California Legislature has adopted statues to address discrimination in the private as well as the public sector. California and federal law should be examined together. People who believe that they have experienced discrimination or have been denied other rights may file a complaint with California's Department of Fair Employment and Housing (DFEH).

For a detailed analysis of the legal rights of disabled individuals, please refer to California's Office of the Attorney General.

Title VI Complaint Procedures
Posted on the GCT Web Site in English and Spanish

HOW TO FILE A COMPLAINT

Any person who believes that he or she has, individually, or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color, or national origin may file a Title VI complaint with GCT. The complaint should be submitted by the complainant and his/her designee as soon as possible but must be filed within 180 days of the date of the alleged discrimination. For information on how to file a complaint, contact GCT by any of the methods provided below.

Mail:

Gold Coast Transit
General Manager
301 E Third Street
Oxnard, CA 93030-6048

Phone:

805-483-3959

Fax:

805-487-0925

Website:

Please fill out our Customer Support Form.

The "Title VI Complaint Form" may be used to detail the complaint, but is not mandatory. Complaint forms may also be obtained by calling 805-487-4222. GCT will provide appropriate assistance to complainants who are limited in their ability to communicate in English.

In addition to the Title VI complaint process at GCT, a complainant may file a Title VI complaint with the Federal Transit Administration (FTA), Office of Civil Rights, at the following address:

Federal Transit Administration
Office of Civil Rights
Region IX,
201 Mission Street, Suite 1650,
San Francisco, California 94105-1839.

The FTA's complaint procedure is contained in the FTA Circular C4702.1B.

HOW FEDERAL TITLE VI COMPLAINTS ARE PROCESSED BY GCT


All complaints alleging discrimination based on race, color or national origin in a transit service or benefit provided by GCT will be investigated promptly. GCT will acknowledge in writing the receipt of the complaint within ten (10) working days. Based upon the receipt of all information required, the investigation will normally be completed with ninety (90) days of receipt. In some cases GCT may submit a written request to the complainant to provide additional information. Receipt of additional relevant information may expand the timing of the complaint resolution.

The GCT General Manager will determine if the complaint may be administratively closed or if a final written response is needed. If a final written response is needed, GCT will send the response to the complainant. The written response will notify the complainant that there were violations and that effort is underway to correct them or that the file will be closed because the investigation did not uncover any violations.

The complainant also will be advised of his/her right to appeal the response to federal and state authorities as appropriate. The individual's right to a prompt and equitable resolution of a complaint will not be impaired by his/her pursuit of other remedies. The use of this grievance process is not a prerequisite to the pursuit of other remedies.

Title VI Complaint Form

This form will be sent to anyone requesting one by calling or writing to the GCT Administration Office.

<p>Title VI Complaint Form Gold Coast Transit (GCT) Oxnard, CA 93030</p>		
<p>GCT is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.</p>		
<p>The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact the Title VI Officer by calling (805) 483-3959. The completed form must be returned to Gold Coast Transit, Title VI Coordinator, 301 East Third Street, Oxnard, CA 93030</p>		
Your Name:	Phone:	
Street Address:	Alt Phone:	
	City, State & Zip Code:	
Person(s) discriminated against (if someone other than complainant):		
Name(s):		
Street Address, City, State & Zip Code:		
Which of the following best describes the reason the alleged discrimination took place? (Circle one)	Date of Incident:	
Race Color National Origin (Limited English Proficiency)		
Please describe the alleged incident(s) of discrimination. Provide the names and titles of all GCT employees involved if available. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.		
Complete reverse side of form		

7.0 TITLE VI EQUITY ANALYSIS

Because GCT has not constructed a new facility in the past three years, a Title VI Equity Analysis is not included in this update.

8.0 SUBRECIPIENTS

GCT does not have subrecipients that receive FTA funding through GCT.

9.0 MEANINGFUL ACCESS TO LEP PERSONS

GCT shall ensure meaningful access to benefits, services, information, and other important portions of GCT operations and activities for individuals who are limited-English proficient (LEP). In order to ensure meaningful access to programs and activities, GCT utilized the Four Factor Analysis described in FTA Circular 4702.1B to determine the specific language services that are appropriate to provide. The analysis is presented in Appendix 2. The analysis was utilized to develop the LEP Plan included in Appendix 2.

10.0 PUBLIC PARTICIPATION PLAN

Federal regulations require transit operators to take reasonable steps to ensure that Limited English Proficient (LEP) persons have meaningful access to their programs and activities. This means that public participation opportunities, normally provided in English, should be accessible to persons who have a limited ability to speak, read, write, or understand English. GCT provides Spanish language assistance at all public participation activities to assure meaningful access.

In addition to language access measures, other major components of the Public Participation Plan (PPP) include a range of public participation methods to provide information, to invite participation and/or to seek input; examples to demonstrate how population-appropriate outreach methods can be and were identified and utilized. GCT's PPP is attached in Appendix zzz.

11.0 APPROVAL OF TITLE VI PLAN BY GOVERNING BODY

In accordance with 49 CFR Section 21.9 (b), GCTs document their compliance with DOT's Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years or as otherwise directed by FTA. This documentation must include approval of the Title VI Program the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA.

The meeting minutes documenting the Board's approval of GCT's 2013 Title VI update from the April 3, 2013 board meeting are attached in Appendix 4.

12.0 FIXED ROUTE PROVIDER REQUIREMENTS

Because GCT operates fewer than 50 fixed route vehicles during peak service, this update maintains the System-wide service standards and system-wide service policies but no longer includes the demographic analysis, demographics and travel pattern data, or the results of the monitoring program of service standards and policies.

12.1.1 Services - GCT provides fixed-route service and complementary paratransit service as mandated under the Americans with Disabilities Act of 1990.

12.1.2 GCT Facilities - The GCT maintenance yard, operations department and administration office are located at 301 East Third Street, Oxnard, California. The Customer Service Center is located at the Oxnard Transportation Center (in downtown Oxnard and adjacent to the high minority area of Colonia). Our close proximity to this heavily transit dependent group provides easy access for the application and distribution of Disability Identification Cards, 75+ Free Fare Identification Cards, Fare Media including Multi-Ride (10, 20 & 30) tickets, day and monthly passes for each fare category, as well as route and schedule information.

12.1.3 GCT Fares - Passenger fares for GCT are as follows:

CASH FARE

Adult (<i>Through age 64</i>).....	\$1.50
Youth (<i>Through age 18 with school I.D. or proof of age</i>)	\$1.50
Senior (<i>65 and older with proof of age</i>).....	75¢
Medicare (<i>Medicare card</i>).....	75¢
Disabled (<i>GCT Disability ID or ADA ID</i>).....	75¢
75+ (<i>GCT 75+ I.D. – all day everyday</i>)	Free
Child (<i>Under 45 inches tall</i>) - when accompanied by paid fare	Free
Transfers (<i>with initial fare</i>).....	Free

TICKETS & PASSES DAY PASS

Adult	\$4.00
Youth.....	\$4.00
Senior/Disabled	\$2.00

10-RIDE TICKET

Adult	\$14.00
Youth.....	\$11.00
Senior/Disabled	\$6.50

20-RIDE TICKET

Adult	\$26.00
Youth	\$20.50
Senior/Disabled	\$12.00

30-RIDE TICKET

Adult	\$36.00
Youth	\$29.00
Senior/Disabled	\$17.50

MONTHLY PASS

Adult	\$49.00
Youth	\$38.50
Senior/Disabled	\$21.50

Since there are no transfer or zone charges, passengers making a journey that requires more than one bus are able to do so at the cost of the initial boarding.

12.3 Service Standards and Policies - At the March 3, 2010 GCT Board meeting, Goals, Objectives and Standards, presented in Appendix 2 were adopted for fixed route service. Their purpose is to provide an operational-oriented set of standards that are easily measured. The performance indicators and evaluating criteria that have been used by GCT in its annual ridership and operational analysis are also presented in this Appendix.

The following service standards and policies were adopted by the GCT Board of Directors on December 5, 2001. These standards and policies are consistent with FTA Circular 4702.1B and the Goals, Objectives and Policies previously adopted by the Board.

There are five transit service indicators considered by FTA to be significant to monitor a public transit system's compliance with Title VI. Their applicability to GCT service together with minimum service standards are identified, as follows, for each indicator:

12.3.1 Vehicle Load: Vehicle load, or load factor, is a ratio of the number of seats on a vehicle to the number of passengers. Load factor is an indicator of the extent of probable overcrowding or the need for additional vehicles. It is also a means to determine whether the level of service on a particular route at a particular time is adequate to assure a level of service deemed appropriate for the transit system (The load factor is determined by taking the number of seats on a specific route which pass the peak point during the peak hour and dividing that into the number of passengers that are actually carried past that point during that hour).

12.3.1.1 Applicability to GCT Service: Vehicle loads are closely monitored for all routes to determine if additional vehicles are needed to avoid overcrowding and to identify routes which may have an excessive amount of coach runs assigned to them.

12.3.1.2 Minimum standard: Maximum load factor should not exceed 1:1.25 based on seated capacity. The most recent system-wide load profile check (Table 1) determined that all but one of the routes surveyed experienced a load factor of 1:09 or less. These routes therefore fall within the acceptable range adopted by the GCT Board. The Route 4B currently has vehicle loads that were determined to be in excess of the adopted 1:1.25 standard. Steps to mitigate this have been taken. Larger 40' buses have replaced the smaller 35' vehicles that were originally scheduled on this route. Planning staff schedules periodic ride surveys to determine ridership demand throughout the day.

12.3.2 Vehicle Assignment: Vehicle assignment refers to the process by which transit vehicles are assigned to routes throughout the system due to variations among vehicles, types of service offered, timing of vehicle assignments and other factors.

12.3.2.1 Applicability to GCT Service: Buses are assigned to routes on a daily basis, utilizing the newest buses regularly. Buses are rotated among all routes. A CNG fleet requires a higher spare ratio to provide the service while adhering to the maintenance schedule.

GCT is a relatively small transit agency with a fleet of 54 buses and a peak requirement of 45 buses. In contrast to its small size, it serves a large 91 square mile area with a population of approximately 408,000.

GCT's fleet consists of the following:

<u>Number of Buses</u>	<u>Year</u>	<u>Model</u>	<u>Fuel Type</u>
6	2001	NABI (40' low floor)	CNG
2	2002	NABI (40' low floor)	CNG
3	2004	NABI (40' low floor)	CNG
26	2006	New Flyer (40' low floor)	CNG
9	2009	NABI (35' low floor)	CNG
8	2010	NABI (35' low floor)	CNG
54	Buses Total		

12.3.2.2 Minimum standard: Vehicles shall be assigned solely on the load requirements and length of service day for a specific route to maximize fleet utilization. Vehicles should be replaced on a schedule consistent with FTA lifecycle guidelines. Preventive Maintenance Inspections (PMI) shall be conducted on schedule and consistent with the

manufacturers' recommendations. All vehicle interiors shall be cleaned daily; exteriors shall be cleaned every other day. There shall be no mechanical defects in equipment when placed into revenue service.

12.3.3 Vehicle Headway: Vehicle headway is the measurement of the time interval between two vehicles traveling in the same direction on the same route. The frequency of service is a general indication of the level of service provided along a route and a factor in the calculation of the amount of travel time expended by a passenger to reach his/her destination. It is generally expressed for peak and off peak service as an increment of time.

12.3.3.1 Applicability to GCT Service: GCT provides transit service levels relative to the needs of each area. As many minority areas (for example, the Colonia area in Oxnard and the Ventura Avenue area in Ventura) rely heavily on public transportation for mobility, these areas receive greater service frequency. Weekday headways average 50 minutes in most areas of heavy minority concentrations. The Oxnard/Ventura-Main Street route, used a great deal by transit dependent commuters between these two cities, has 25-minute headways. Areas with less transit dependency, predominately suburban, middle-income areas, receive less frequent service with headways averaging 60 minutes. Weekend headways are less frequent than on weekdays due to lower ridership. Please refer to Table 2 for an overview of route headways.

12.3.4 Distribution of Transit Amenities: Transit amenities refer to items of comfort and convenience available to the general riding public such as bus shelters, benches, trash cans, etc. Policies or standards in this area address how these amenities are distributed within a transit system. The manner in which such amenities/facilities are distributed determines whether transit users have equal access to these.

12.3.4.1 Applicability to GCT Service: The responsibility for installation and maintenance of street furniture (benches and shelters) has been retained by each individual jurisdiction in the GCT service area. GCT neither owns nor controls the placement of these items. However, GCT does offer suggestions on the placement of benches in locations where they are most needed. The GCT member agencies have worked toward increased and improved amenities at bus stops in their jurisdictions. Because of the favorable climate in Ventura County, shelters have only been utilized on a limited basis in most jurisdictions, while benches are predominately used.

The Oxnard Transportation Center (OTC) located in downtown Oxnard is a multi-modal center and provides an island that accommodates ten GCT buses. The bus island features a canopy the length of the island, several benches, a refreshment vending machine, coin change machine and kiosk

containing GCT route maps, fare information and telephone numbers for information. The GCT Customer Service Center is located at the OTC and is open 7:00 a.m. – 7:00 p.m., Monday through Friday. Passengers are able to purchase prepaid fare instruments, obtain disability and 75+ identification cards, as well as obtain route and schedule information. Within the OTC are public restrooms and a snack shop which are available to GCT passengers.

The Ventura Transfer Center (VTC) located near the Pacific View Mall in Ventura consists of a bus island with public restrooms, drinking fountain, telephone and a shelter. The VTC serves both GCT and VISTA (inter-county service operated by the Ventura County Transportation Commission) buses.

12.3.4.2 Minimum standard: A bench is recommended at stops that have moderate usage and a bench and shelter are recommended at stops with high usage. Trash cans would also be suggested at high usage stops and any stop that has problems with litter. GCT provides the local jurisdictions with direction on which bus stops warrant which type of amenity.

12.3.5 Transit Access: Transit access is a measure of the distance a person must travel to gain access to transit service. When measured in time intervals, it is a component of the calculation of travel time. Transit access is a general measure of the distribution of routes within a transit district. The standards or policies covering this area apply to existing services as well as proposed changes in levels of service.

12.3.5.1 Applicability to GCT Service: GCT generally has a high penetration of the residential and business areas with its few routes. In many of the minority census tracts, the population is low income and does not have other means of transportation available to them. The majority of fixed-route mileage is located in the minority census tracts.

12.3.5.2 Minimum standard: A route shall be located within $\frac{3}{4}$ mile of any area determined to have transit needs that would provide a minimum productivity of 20 passengers per hour on trunk routes and 10 passengers per hour on local routes. Service should be expanded to areas currently not served only if the service can meet and maintain specific productivity and efficiency standards established prior to implementation.