



OmniTrans 2015 Title VI Triennial Update



September 2015

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Background

In March 1976, Omnitrans was formed as a Joint Powers Authority (JPA) to be the primary provider of transportation in the San Bernardino Valley. Omnitrans' service area is bounded by the San Bernardino Mountains to the north, the Los Angeles County Line to the west, the Riverside County Line to the south, and the Yucaipa Valley on the east.

Omnitrans' service area is broadly defined as the area encompassing Omnitrans' 15 JPA member cities: Chino, Chino Hills, Colton, Fontana, Grand Terrace, Highland, Loma Linda, Montclair, Ontario, Rancho Cucamonga, Redlands, Rialto, San Bernardino, Upland and Yucaipa; and, the contained unincorporated San Bernardino County areas specifically including the larger unincorporated communities of Bloomington, Mentone, and Muscoy.

Since the 2012 Title VI Triennial report, Omnitrans' services have undergone a series of changes:

- In September of 2013, a minor fare change went into effect involving the Go Smart Program and Youth Passes;
- In April of 2014, a major service change coincided with the launch of the sbX Green Line, Omnitrans' first Bus Rapid Transit route and the resulting adjustment to local routing;
- In September 2014, the agency had its first fare increase in five years;
- In September 2014, there were a changes made to a number of routes in the East Valley Service area that were developed as part of Omnitrans' OmniConnects Short-Range Transit Plan (SRTP) FY2015-2020;
- In January of 2015, Omnitrans initiated a Veterans' Fare discount category.
- In September of 2015, Omnitrans proposes to complete its OmniConnects planned West Valley fixed route changes, introduce the Route 290 peak-hour freeway express service and open the San Bernardino Transit Center (SBTC).

These changes are summarized in Exhibit 1 along with the indication that a service equity or fare equity analysis was completed for each.

Exhibit 1: Major Service Changes at Omnitrans over the Last Three Years

MAJOR CHANGE	DATE IMPLEMENTED	Equity Analysis Completed
1. Fare Change	September 2, 2013	Yes
2. Service Change (sbX begins)	April 28, 2014	Yes
3. OmniConnects' Fare Change; East Valley Service Changes	September 2, 2014	Yes
4. Veterans' Fare Discount	January 5, 2015	Yes
5. West Valley Service Changes; Route 290 introduced; SBTC opens. (PROPOSED)	September 8, 2015 (PROPOSED)	Yes

Omnitrans' service area is approximately 456 square miles; based on the ADA / Access service area definition of a ¼-mile buffer placed around all fixed routes, as shown in Exhibit 2. According to the 2010 census, Omnitrans' service area contains approximately 1.48 million people. The agency's service population continues to grow, and according to the latest projections from Southern California Association of Governments (SCAG), the service area population in 2015 will be 1.6 million.

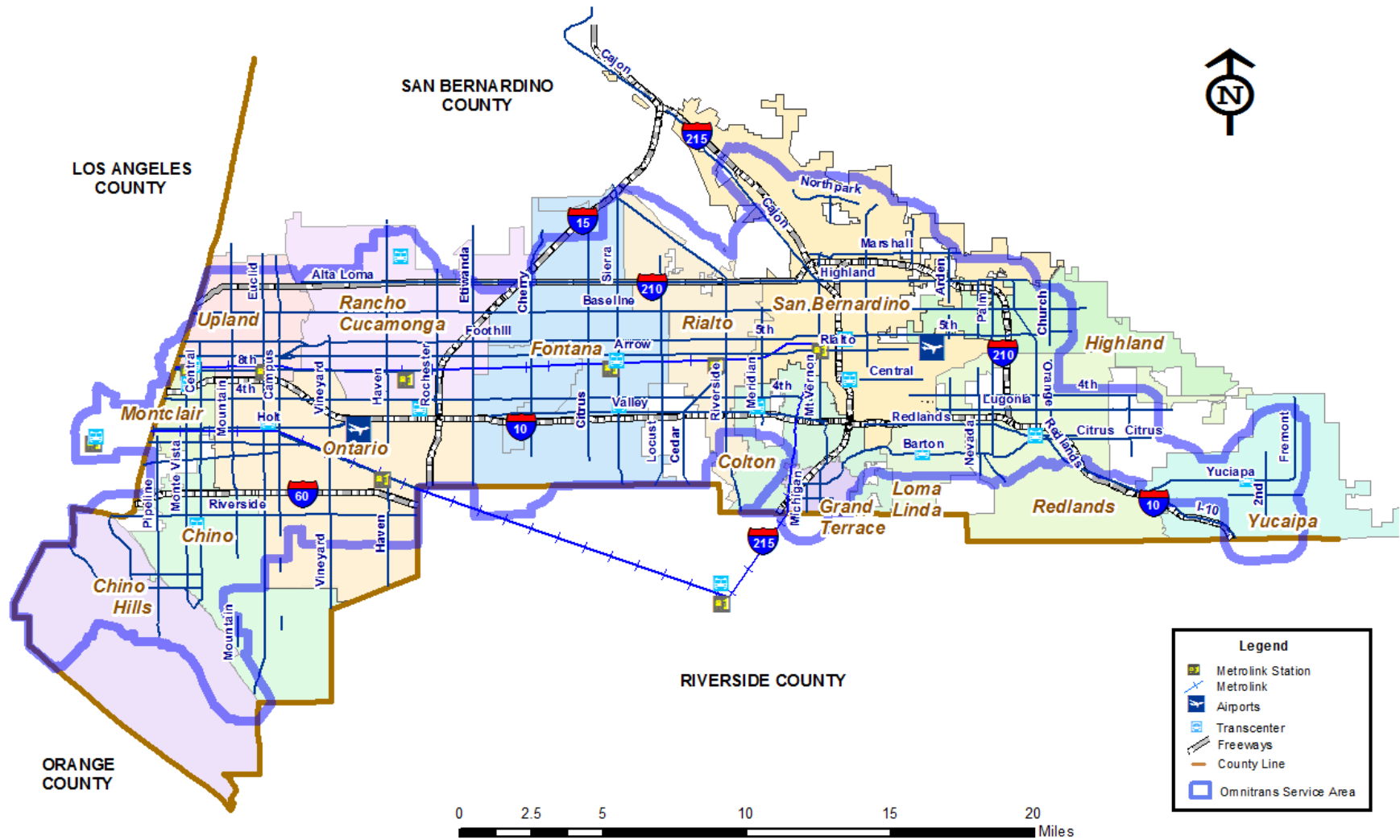
As of May 2015, Omnitrans operates a peak fixed route fleet of 143 coaches (94 assigned to East Valley and 49 assigned to West Valley). Omnitrans' demand response fleet consists of 106 vehicles.

An across-the-board fare increase in 2014 and declining fuel prices combined to reduce ridership over this triennial period. During Fiscal Year 2013 (FY2013), Omnitrans served more than 15.66 million riders; in FY2014, Omnitrans served nearly 15.12 million riders. Currently, in FY2015, Omnitrans is projected to serve over 13.6 million riders by the end of fiscal year 2015. Elasticity models predict that ridership tends to fall after a fare increases, then return after a period of recovery; ridership should recover and grow as Omnitrans continues to expand service to meet demands of a growing population, and as the San Bernardino Transit Center goes into service in September of 2015.

Omnitrans is governed by a Board of Directors consisting of 20 elected officials, with one from each of the 15 JPA cities and the five San Bernardino County Supervisors. The Omnitrans Board is responsible for the establishment of all policies, rules, and regulations under which the agency operates. Committees, made up of the members of the Board, oversee specific functional areas of the agency. The committees are:

1. Executive Committee
2. Administrative and Finance Committee
3. Plans and Programs Committee
4. Operations and Safety Committee
5. Ad-hoc Committees as needed

Exhibit 2: Omnitrans' Service Area by Municipal Boundaries



Area development, population growth, and increases in vehicle miles traveled within the Omnitrans service area typically outpace that of much of the Southern California region. Addressing the general mobility needs of area residents and specialized transportation needs of select groups such as seniors and persons with disabilities offer great challenges and opportunities in the years ahead as Omnitrans seeks to realize its mission.

Omnitrans' Mission

The Omnitrans Mission Statement sets the framework for the development of service goals and objectives. It promotes a philosophy of service delivery and reflects the collective vision of the Board, Management, and Omnitrans' staff of how transit should operate, and whom it should serve. Omnitrans' Mission Statement is as follows:

“To provide San Bernardino Valley with comprehensive public mass transportation services which maximize customer use, comfort, safety, and satisfaction while efficiently using financial and other resources in an environmentally sensitive manner.”

To accomplish this, Omnitrans has set forth seven goals in OmniConnects, the FY2015-2020 Short Range Transit Plan (S RTP):

- Deliver safe, reliable, clean, frequent, convenient, comfortable and equitable service.
- Enhance Omnitrans' network design to increase ridership and minimize costs by reducing redundancy.
- Minimize impact to existing riders while seeking opportunities to expand ridership.
- Support the local economy by providing connections to where people want to go.
- Maximize cost recovery while charging a fair fare.
- Support initiatives that are financially and environmentally sustainable in the short and long term.
- Expand, maintain and improve existing vehicles, facilities and passenger amenities.

These goals lead to Omnitrans focusing on six Strategic Initiatives outlined in the FY2016 Management Plan:

- Fuel Cost Reduction
- New Bus Technology
- West Valley Connector Corridor
- San Bernardino Transit Center
- September Service Change
- Consistent Staffing Levels

Personnel Structure

As of May of 2015, Omnitrans has a budgeted staff of 672 employees to provide its services, but at present has 653 employees. The CEO/General Manager is responsible for the day-to-day management of Omnitrans and acts as the liaison to the Board of Directors and each of the committees. Reporting to the CEO/General Manager are the following departments:

1. Administration
2. Human Resources & Safety and Security
3. Integrated Project Management Office
4. Internal Audit Services
5. Maintenance
6. Marketing & Planning
7. Operations
8. Finance
9. Procurement
10. Information Technology

Employees work out of two locations: East Valley (San Bernardino) and West Valley (Montclair).

Services Provided

Omnitrans currently operates two types of services:

Fixed Route Services: As of May of 2015, Omnitrans operates 32 fixed bus routes consisting of 21 East Valley Routes (east of I-15); and 11 routes in the West Valley (west of I-15). Of these 32 routes, 27 are directly operated and five are contracted out called OmniGo Community Circulators. The directly operated routes primarily utilize 40-foot and 33-foot coaches, running primarily along major east-west and north-south corridors. Headways vary from 15-minute to hourly service. A single limited-stop bus rapid transit route (sbX Green Line) utilizes 60-foot articulated coaches and operates on a 10- and 15-minute frequency. The OmniGo routes utilize a smaller cutaway bus and typically operate on a 30- or 60- minute headway; however, OmniGo route 325 operated a 70-minute headway to facilitate a timed transfer with a neighboring transit agency. Exhibit 3, Exhibit 4, and Exhibit 5 on the following pages illustrate Omnitrans' Fixed Route Network, demonstrate the tiers of service offered, and show Omnitrans' connectivity to neighboring transit agencies.

The map displays the Omnitrans Service Area in San Bernardino County, California. The service area is outlined in blue and includes a network of green lines representing fixed routes. Major highways shown include Interstates 5, 10, 15, 210, and 215, as well as State Routes 60, 65, 68, 78, 80, 82, 91, 10, 15, 210, 215, 60, 65, 68, 78, 80, 82, 91. The map also shows county boundaries for Los Angeles, San Bernardino, Orange, and Riverside. A legend in the bottom right corner identifies symbols for Metrolink stations, airports, transit centers, freeways, county lines, Omnitrans fixed routes, and the Omnitrans service area. A scale bar at the bottom indicates distances from 0 to 20 miles.

Exhibit 4: Omnitrans' Fixed Route Network by Frequency of Service, FY2015

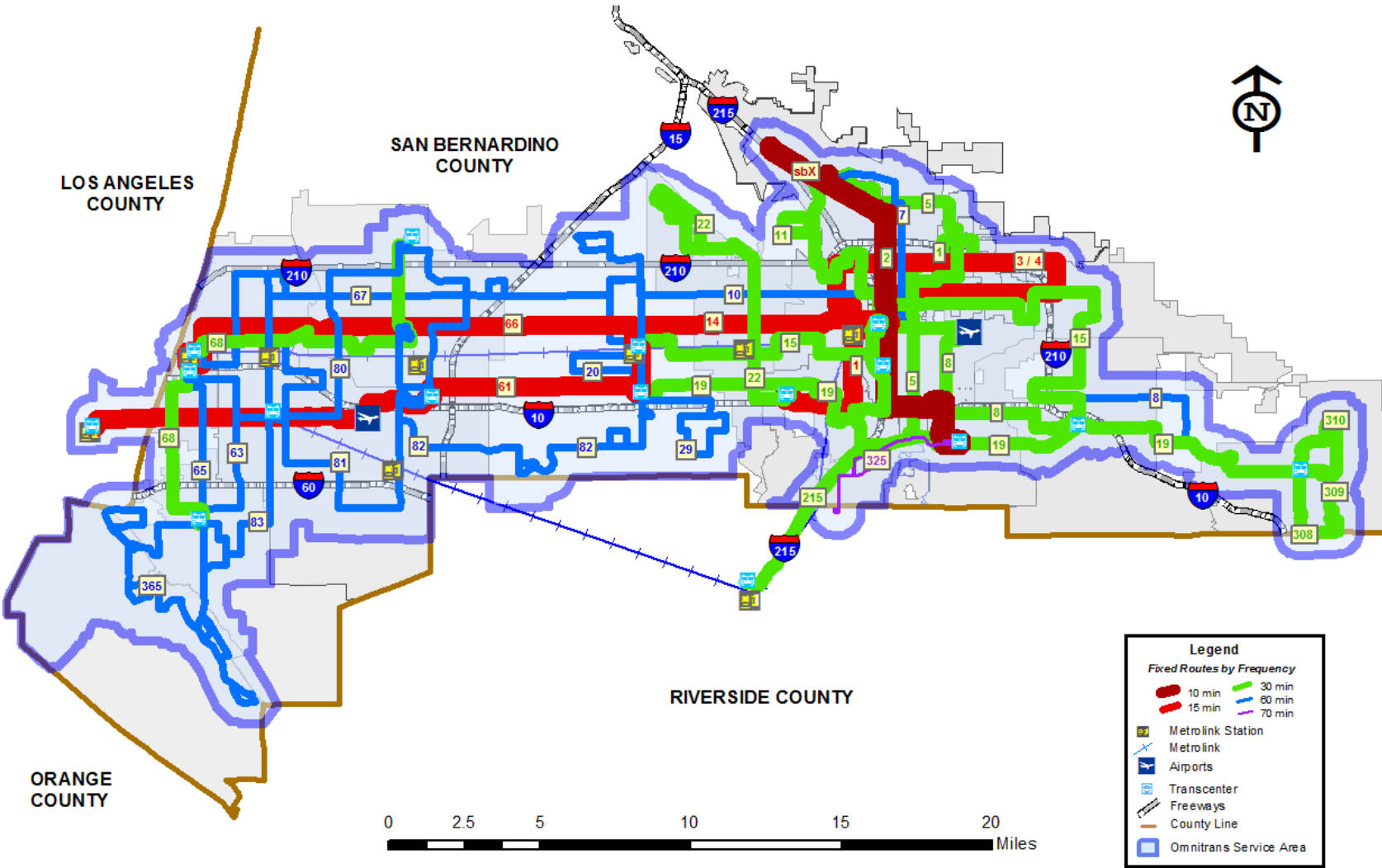
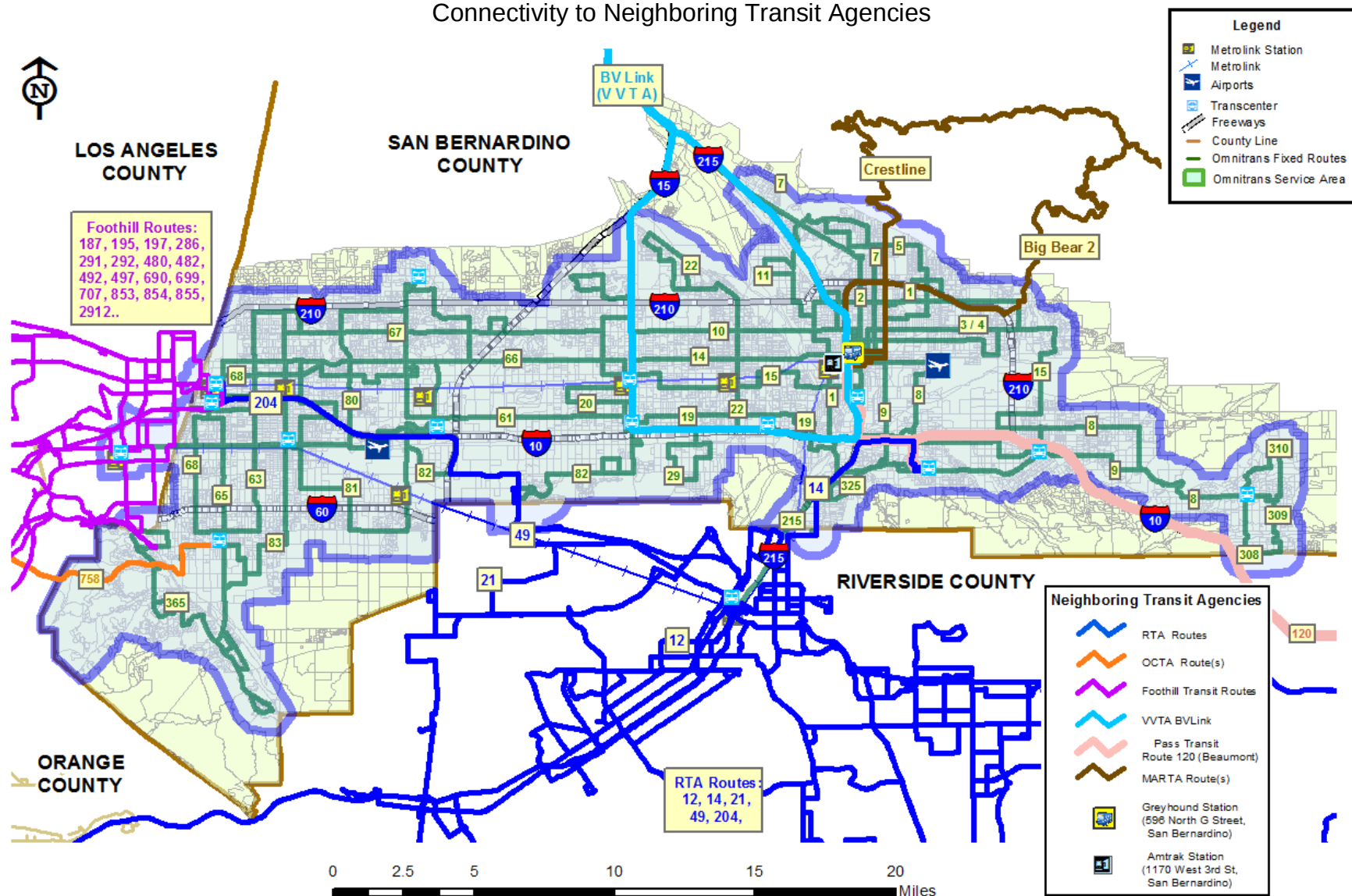


Exhibit 5: Omnitrans' Fixed Route Network and Connectivity to Neighboring Transit Agencies



During the course of a typical weekday, Omnitrans operates approximately 19:52 clock hours of service; 17:29 clock hours on Saturdays; and, 15:21 clock hours on Sundays. The span of fixed route service for weekdays, Saturdays, and Sundays is given below in Exhibit 6:

Exhibit 6: Span of Fixed Route Service

	Weekdays	Saturdays	Sundays
Time Service Begins:	3:41 AM	5:16 AM	5:21 AM
Time Service Ends:	11:35 PM	10:45 PM	8:42 PM
Clock Hours:	19:52 hours	17:29 hours	15:21 hours

Access Service: Access provides public transportation services for individuals who, due to disability, are prevented from using regular bus service (ADA certified). Access operates curb-to-curb on minibuses or vans, complementing the Omnitrans fixed-route bus system. The Access service area is defined as up to ¾-mile on either side of an existing Omnitrans fixed route. Service is available on the same days and at the same times that Omnitrans fixed-route services operate. Exhibit 7 shows Omnitrans' ADA/Access service boundary, and Exhibit 8 shows the six fare zones that are utilized for Access.

In addition to these two services, Omnitrans had operated **OmniLink**. OmniLink service was a general-public, demand-response service that operated in Yucaipa and Chino Hills up until September 2014. OmniGo routes 308, 309, and 310 in Yucaipa and 365 in Chino Hills were introduced in 2010 and served the same regions OmniLink had covered. Overtime it became apparent that OmniLink service became redundant. In 2014 OmniLink service ended. Included with this Title VI Triennial Report is the Service Equity Analysis completed in 2014 before the ending of OmniLink service, demonstrating that Omnitrans has remained compliant with Title VI requirements in ending OmniLink service.

Information on Omnitrans' services can also be found on the website: www.Omnitrans.Org.

Report Purpose

As a recipient of federal funding under the Federal Transit Administration's guidelines, Omnitrans is required to report at a minimum triennially on the recipients' compliance with Title VI requirements. These requirements are outlined in the FTA Circular FTA C 4702.1B, dated October, 2012. This report demonstrates Omnitrans' compliance with these requirements.

More generally, these requirements are set forth in Section 601 of Title VI of the Civil Rights Act of 1964. This states that no person will be discriminated against, excluded from, or denied service based on race, color, or national origin. In order to abide by the Civil Rights Act, each transit agency must report on the services it provides in relation to the population in its service area. In this way, it may be demonstrated that no group or groups are being denied service based on discriminatory planning.

Exhibit 7: Omnitrans Access Service Area Based on ¾-mile Buffer around Fixed Route Network

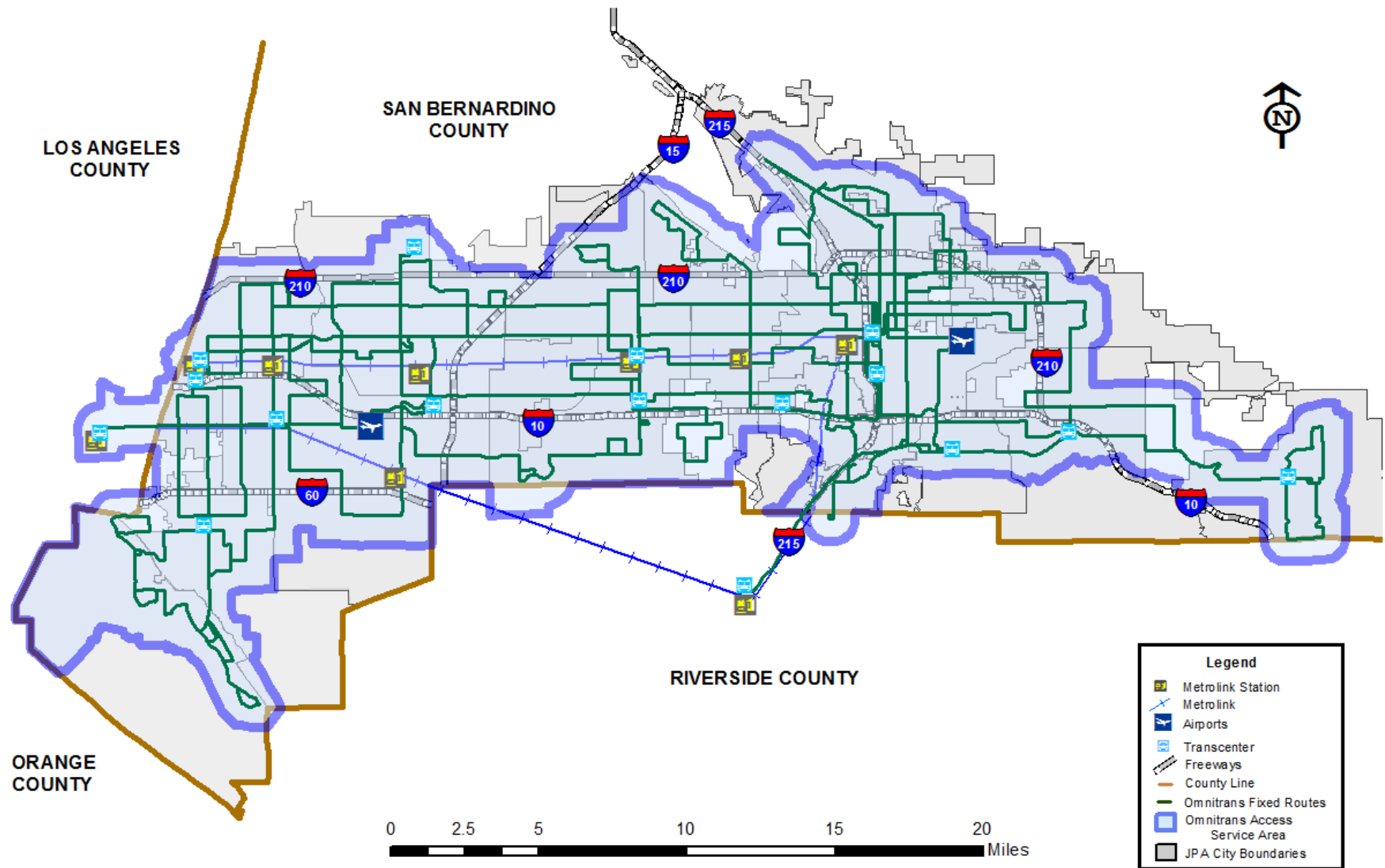
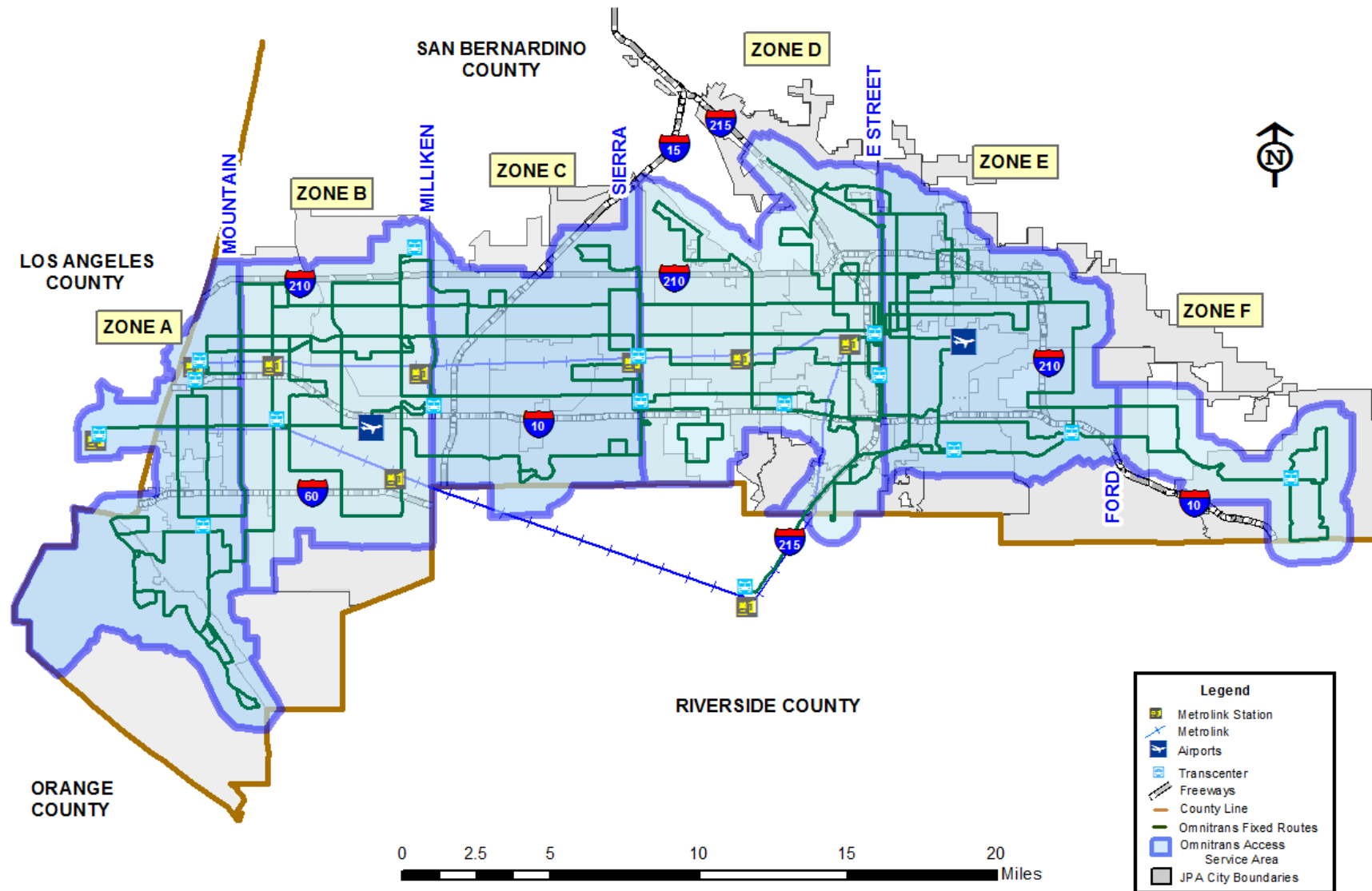


Exhibit 8: Omnitrans' Access Service Area by Fare Zones



GENERAL REPORTING REQUIREMENTS

Omnitrans' Service Area

Omnitrans' service area covers 456 square miles and serves the urbanized area of the San Bernardino Valley region of the County with a population of 1.48 million. The service area includes fifteen cities in our Joint Powers Authority plus some unincorporated areas of San Bernardino County. The fifteen cities Omnitrans serves are: Colton, Fontana, Grand Terrace, Highland, Loma Linda, Redlands, Rialto, San Bernardino, and Yucaipa in the East Valley (east of I-15), and Chino, Chino Hills, Montclair, Ontario, Rancho Cucamonga, and Upland in the West Valley (west of I-15). More formally, the general service area encompasses all fifteen JPA cities, their boundaries, and all unincorporated areas of San Bernardino County in between.

The typical Omnitrans fixed route rider has been described according to particular demographic characteristics. According to Omnitrans' 2011 Attitude and Awareness Study undertaken by Redhill Group, September 2011, the typical Omnitrans' fixed route rider is between the ages of 12 and 39 (48% of respondents), tends to self-identify as Hispanic, and is more likely to be Hispanic (38%) than African American (21%) or Caucasian (18%). The typical Omnitrans rider is also generally female.

The typical user is classified as transit-dependent, because 69% reported "no vehicle was available for this trip", and only 15% contended that a vehicle was available to be used for the trip. 55% of riders have some household member licensed to drive, but only 38% responded that they were licensed drivers themselves. However, 36% responded that they lived in a household without any licensed driver (this, as compared to only 9% of non-riders who reported the same).

The majority of Omnitrans' surveyed riders reports an annual income of less than \$35,000 (60%) and 46% report an annual income of less than \$20,000.

More than half of the population of the Omnitrans service area resides in the communities of San Bernardino, Ontario, Fontana, Rialto, Colton, or Highland. A substantial proportion of our riders would be described as Low Income or Minority (LIM), and based on the 2010 census data, more than 75% of the population in Omnitrans' service area is LIM. The maps provided in Exhibit 9, Exhibit 10, Exhibit 11, Exhibit 12, Exhibit 13 and Exhibit 14 illustrate the distribution of minority and low-income populations throughout Omnitrans' service area.

Exhibit 9: Total Minority Population by Census Tract (Data from US Census 2010)

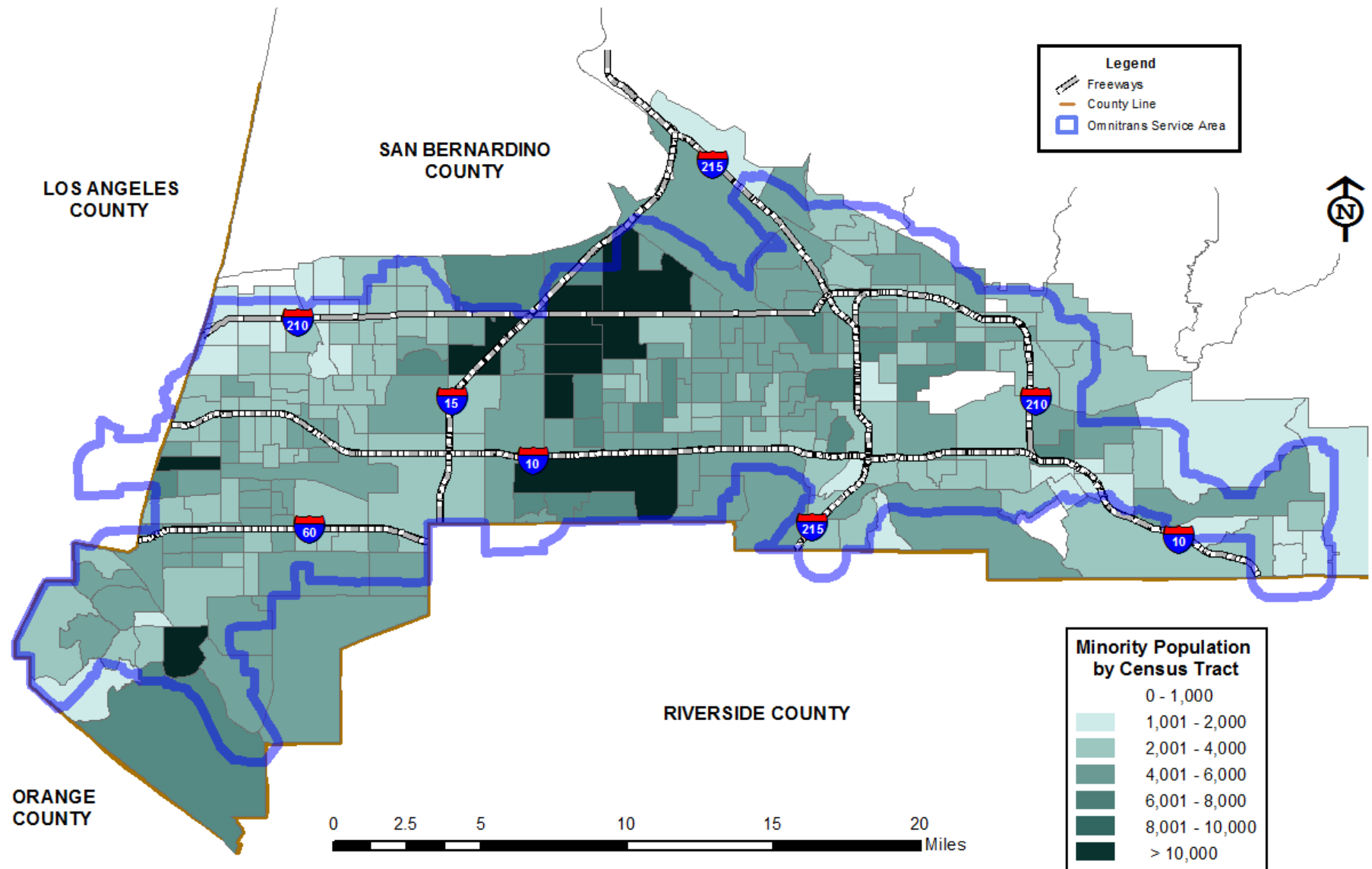


Exhibit 10: Percentage Minority Population by Census Tract (Data from US Census 2010)

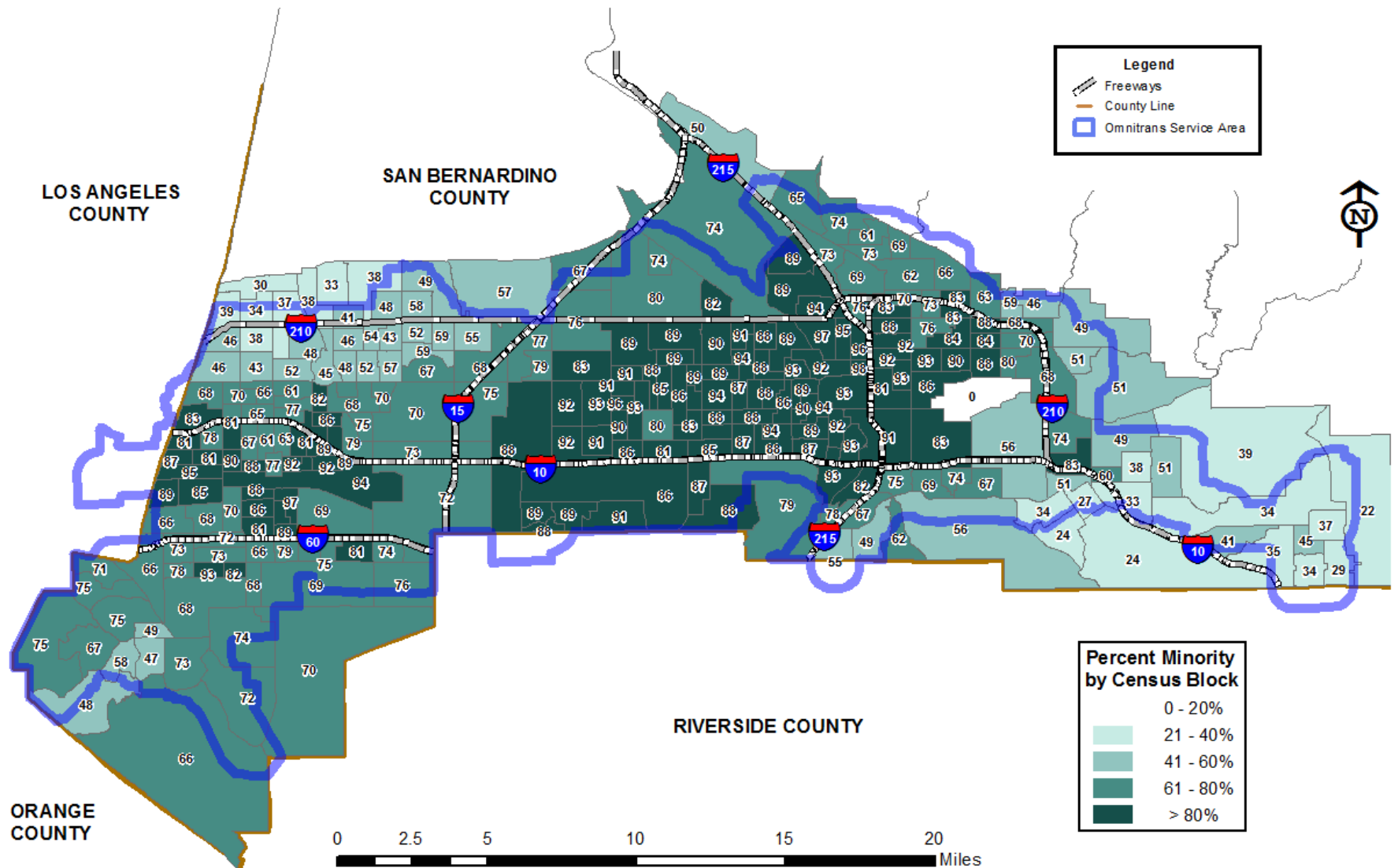


Exhibit 11: Total Minority Population by Census Block (Data from US Census 2010)

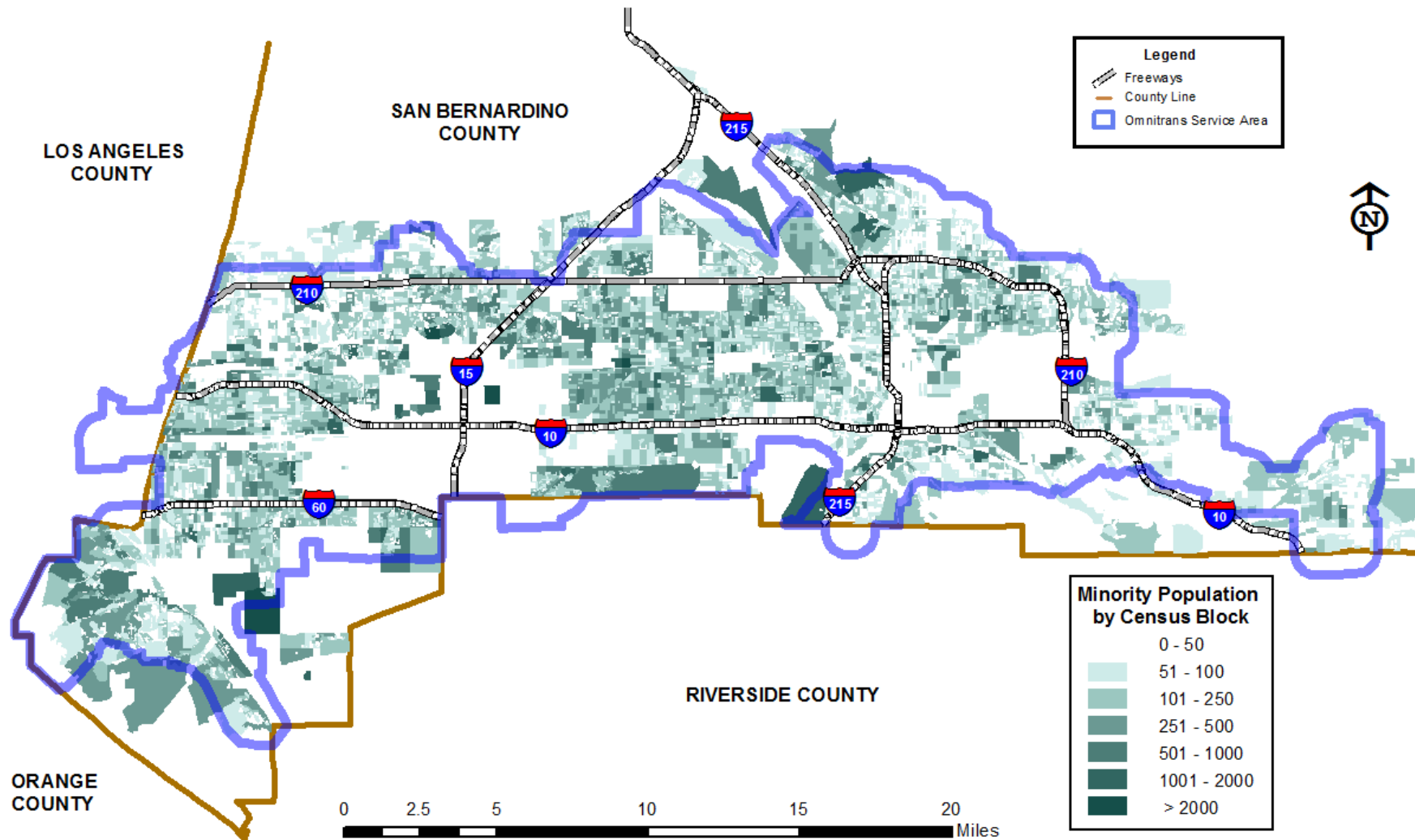


Exhibit 12: Percentage Minority Population by Census Block (Data from US Census 2010)

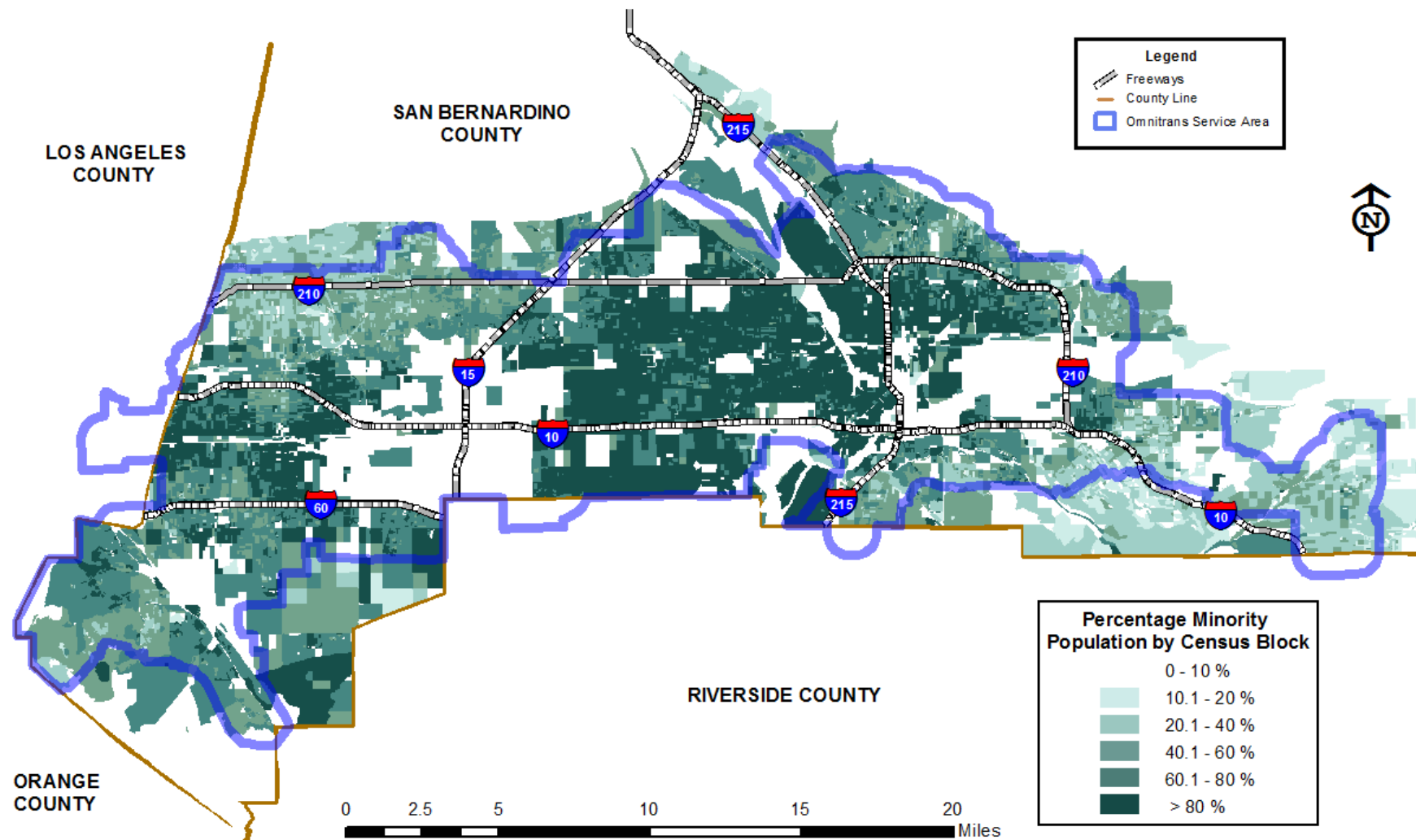


Exhibit 13: Percentage of White Population below Poverty by Census Block Group (Data from US 2010 Census, ACS)

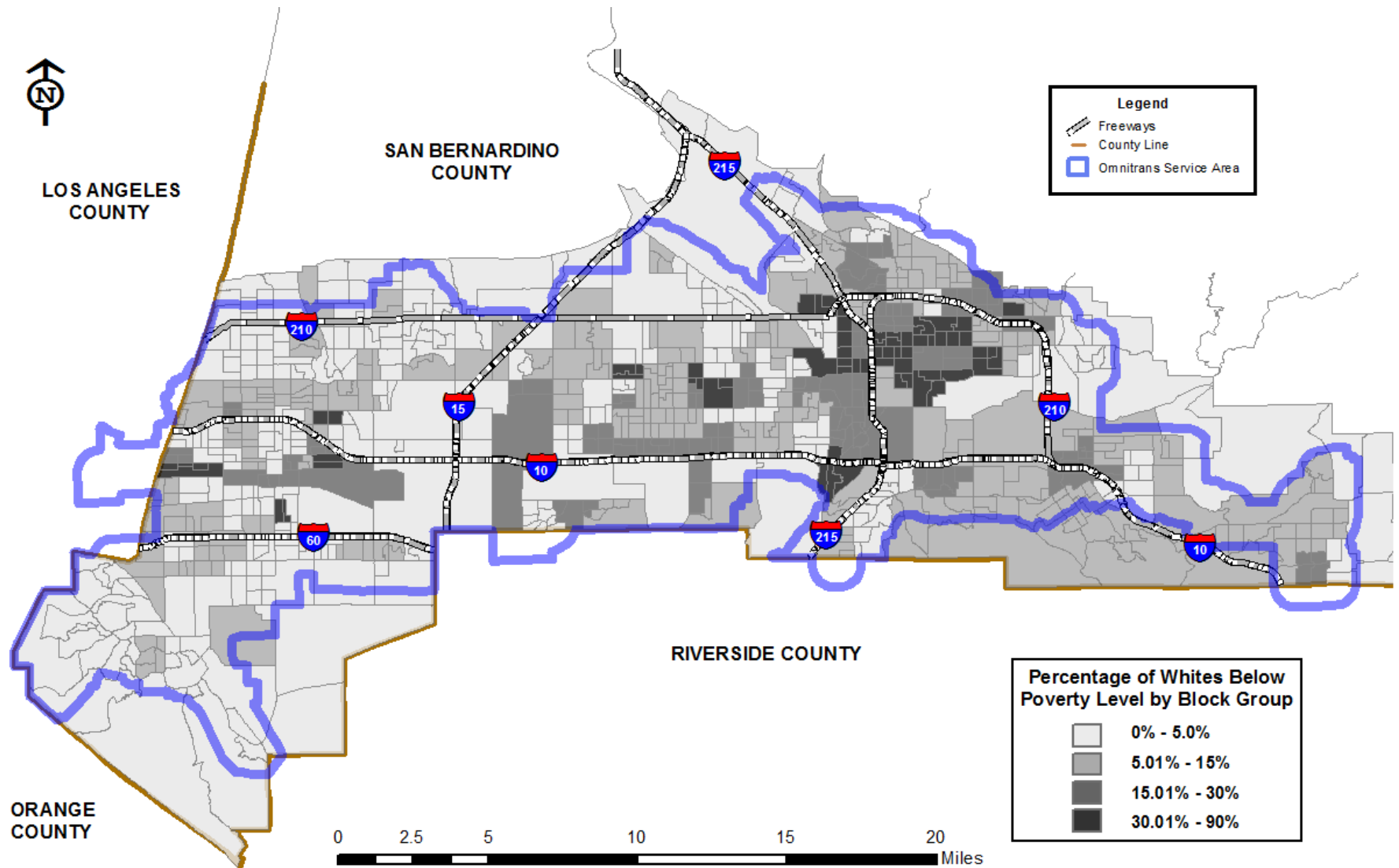


Exhibit 14: Percentage of LIM (Low Income White / Minority) by Census Tract (Data from US Census 2010)

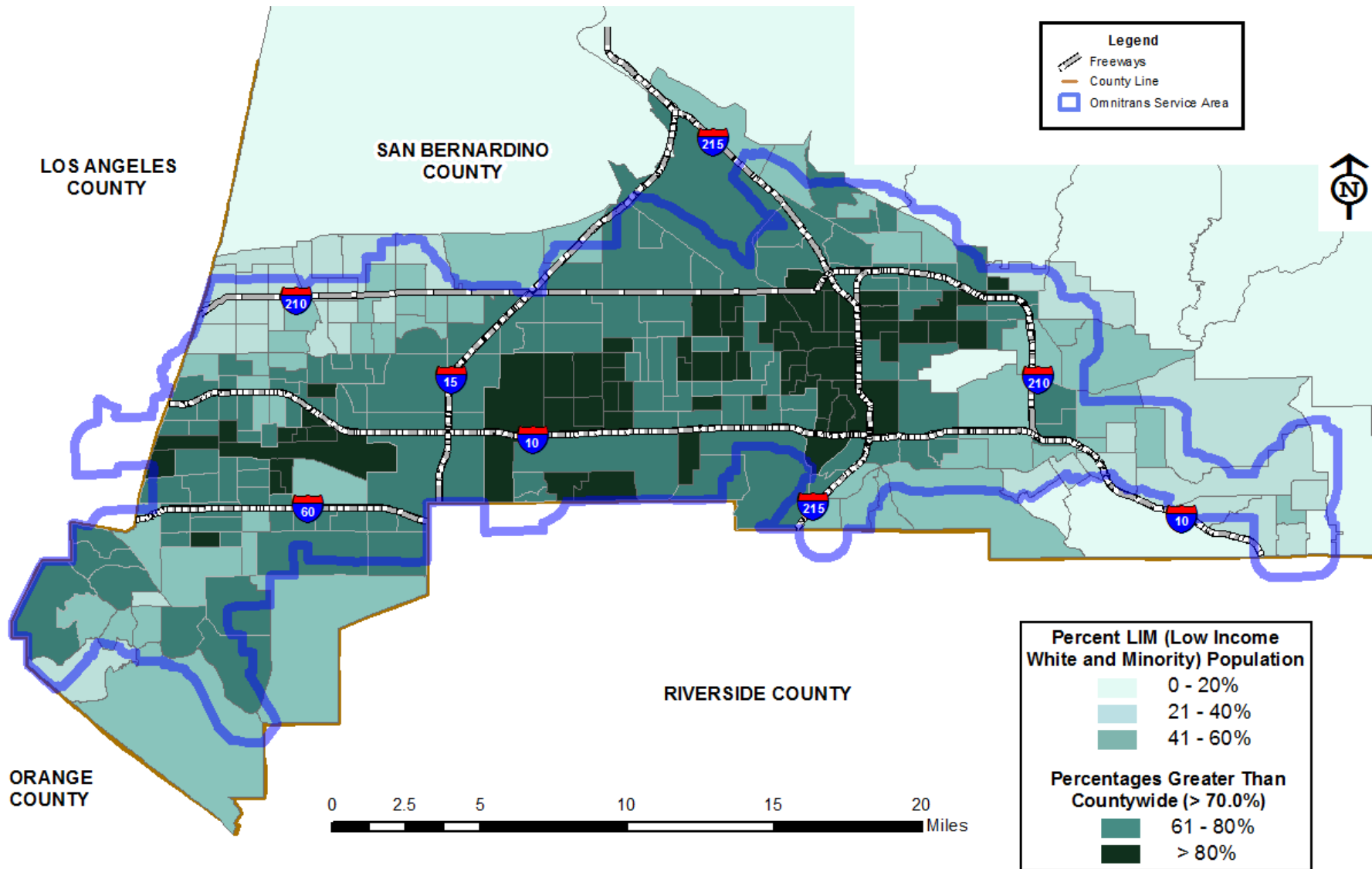


Exhibit 15 below shows the distribution of poverty within the San Bernardino Valley in terms of percentage of the city population living below the poverty threshold.

Exhibit 15: Percentage of Population Living Below the Poverty Line

CITY	%
San Bernardino	27.4%
Colton	17.9%
Highland	17.3%
Montclair	15.2%
Rialto	14.7%
Loma Linda	12.7%
Ontario	12.7%
Fontana	12.5%
Yucaipa	10.4%
Redlands	10.1%
Upland	8.9%
Chino	6.2%
Rancho Cucamonga	4.8%
Chino Hills	4.1%
Grand Terrace	3.9%

Source: 2010 U.S. Census

The City of San Bernardino had the highest rate of poverty, with 27.4% of its residents falling below the poverty line in 2010; this climbed to 31.1 percent in 2013, with an unemployment rate for the city of 17.5 %. The City of Grand Terrace had the lowest rate of poverty (3.9%).

Exhibit 16 and Exhibit 17 show proportions among surveyed riders and non-riders who possess licenses to drive and the number of vehicles per household. These data are taken from the latest Attitude and Awareness Survey done by Redhill Group in 2011.

Exhibit 16: Driver's Licenses Status for Riders and Non-Riders, 2011

Personal Possession of Driver's License	Rider (n=5,323)	Non-Rider (n=401)
Yes	45%	91%
No	55%	9%

Exhibit 17: Number of Working Vehicles per Household, Riders and Non-Riders, 2011

Number of Vehicles	Access Rider (n = 220)	OmniLink Rider (n = 73)	Fixed Route Rider (n = 4,080)*	Non-Rider (n=393)
0	41%	64%	38%	1%
1	41%	25%	18%	16%
2	12%	10%	12%	40%
3	4%	0%	4%	23%
4 or more	2%	1%	13%	20%

*NOTE: Approximately 14% of Fixed Route Respondents did not give an answer or gave NA.

Omnitrans' Service Area population will not remain static, either, but is expected to grow dramatically in the coming years. In the process, a shift in demographics from San Bernardino and the eastern portion of the service area to Ontario and the western portion of the service area is also projected. This trend is demonstrated in the following table of Projected Population Growth by City for Omnitrans' Service Area: 2010 to 2035.

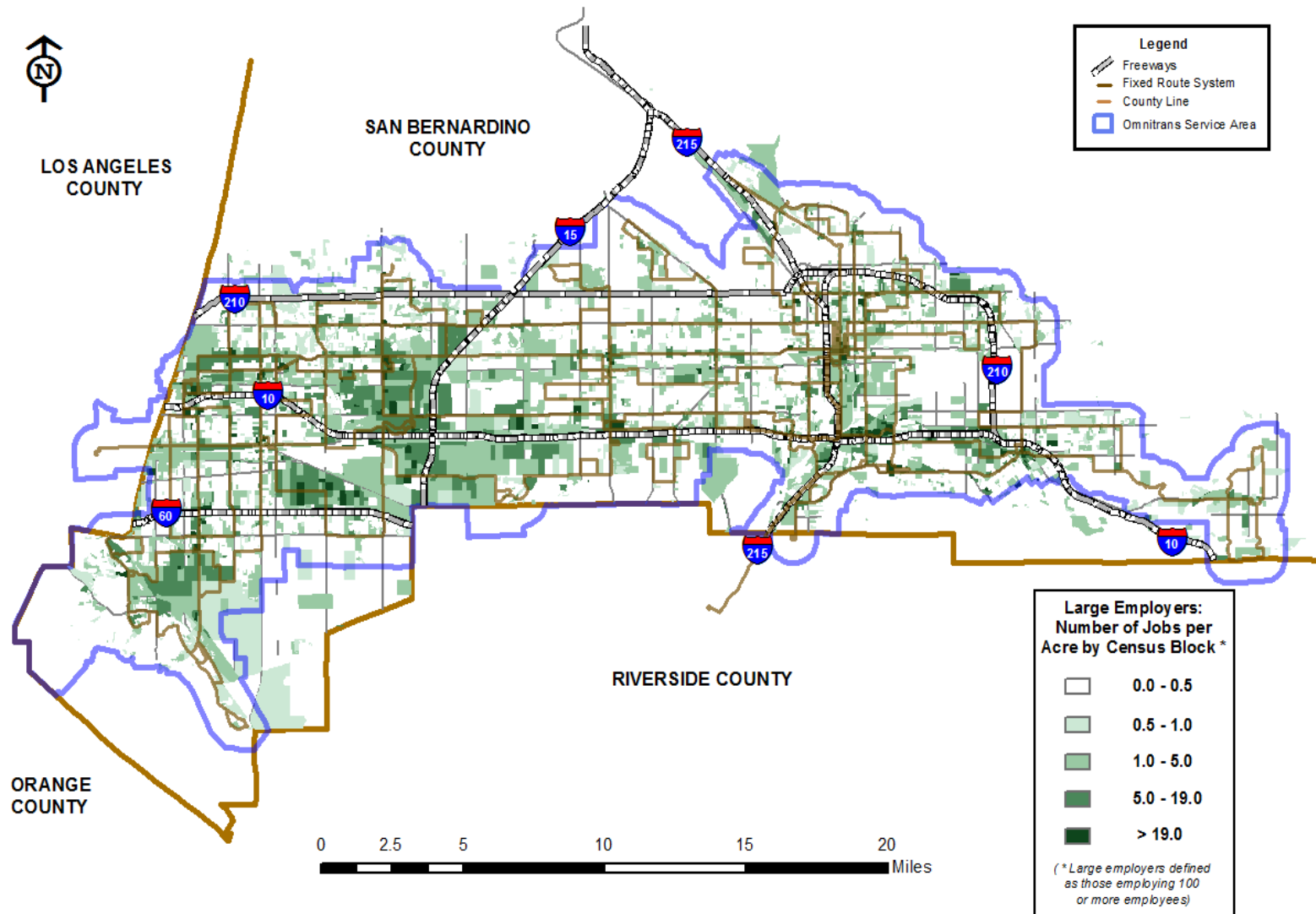
Exhibit 18: Population Estimates for Omnitrans' Service Area by JPA City (2010-2035)

Population Estimates for Omnitrans' Service Area (2010 to 2035)										
CITY	2010	2015	2020	2025	2030	2035	Δ 2010-20	%Δ 2010-20	Δ 2010-35	%Δ 2010-35
Chino	78,000	83,000	89,000	94,000	101,000	107,000	11,000	14.1%	29,000	37.2%
Chino Hills	75,000	76,000	77,000	77,000	78,000	78,000	2,000	2.7%	3,000	4.0%
Colton	52,000	56,000	61,000	64,000	68,000	72,000	9,000	17.3%	20,000	38.5%
Fontana	196,000	209,000	223,000	234,000	246,000	259,000	27,000	13.8%	63,000	32.1%
Grand Terrace	12,000	12,000	13,000	13,000	14,000	14,000	1,000	8.3%	2,000	16.7%
Highland	53,000	57,000	60,000	63,000	67,000	70,000	7,000	13.2%	17,000	32.1%
Loma Linda	23,000	25,000	27,000	28,000	30,000	32,000	4,000	17.4%	9,000	39.1%
Montclair	37,000	38,000	40,000	41,000	42,000	44,000	3,000	8.1%	7,000	18.9%
Ontario	164,000	188,000	216,000	243,000	273,000	308,000	52,000	31.7%	144,000	87.8%
Rancho Cucamonga	165,000	166,000	167,000	167,000	167,000	167,000	2,000	1.2%	2,000	1.2%
Redlands	69,000	72,000	75,000	79,000	84,000	88,000	6,000	8.7%	19,000	27.5%
Rialto	99,000	104,000	110,000	115,000	120,000	125,000	11,000	11.1%	26,000	26.3%
San Bernardino	210,000	220,000	231,000	241,000	251,000	261,000	21,000	10.0%	51,000	24.3%
Upland	74,000	75,000	77,000	78,000	79,000	80,000	3,000	4.1%	6,000	8.1%
Yucaipa	51,000	54,000	56,000	58,000	60,000	62,000	5,000	9.8%	11,000	21.6%
Total Municipal Population	1,358,000	1,435,000	1,522,000	1,595,000	1,680,000	1,767,000	164,000	12.1%	409,000	30.1%
Unincorporated Areas	126,000	133,000	141,000	148,000	155,000	163,000	15,000	11.9%	37,000	29.4%
Omnitrans Service Area Pop	1,484,000	1,568,000	1,663,000	1,743,000	1,835,000	1,930,000	179,000	12.1%	446,000	30.1%
Riverside Additional	33,000	36,000	39,000	42,000	46,000	50,000	6,000	18.2%	17,000	51.5%
Pomona Additional	65,000	71,000	78,000	85,000	92,000	101,000	13,000	20.0%	36,000	55.4%
GRAND TOTAL	1,582,000	1,675,000	1,780,000	1,870,000	1,973,000	2,081,000	198,000	12.5%	499,000	31.5%
SAN BERNARDINO COUNTY	2,035,000	2,219,000	2,419,000	2,637,000	2,875,000	3,134,000	384,000	18.9%	1,099,000	54.0%
* Projections for the years 2010, 2020, and 2035 were obtained from SCAG. The intervening years (2015, 2025, and 2030) were interpolations taken from growth rates derived from these data points.										
NOTE: Data were taken from, and revised according to, the SCAG RTP 2012 Forecast. They were revised using local input and the latest data from the 2010 Census, California Employment Development Department (EDD), and California Department of Finance.										

Although the overall population distribution of Omnitrans' service area vis-à-vis the split between East Valley (San Bernardino-centered) and West Valley (Ontario-centered) is not projected at this time to shift greatly in the next 25 years, the city of Ontario itself is projected to surpass the population of the city of San Bernardino. Projected employment will shift dramatically westward, and employment opportunities in the two cities will also diverge ever more strongly in the next twenty years.

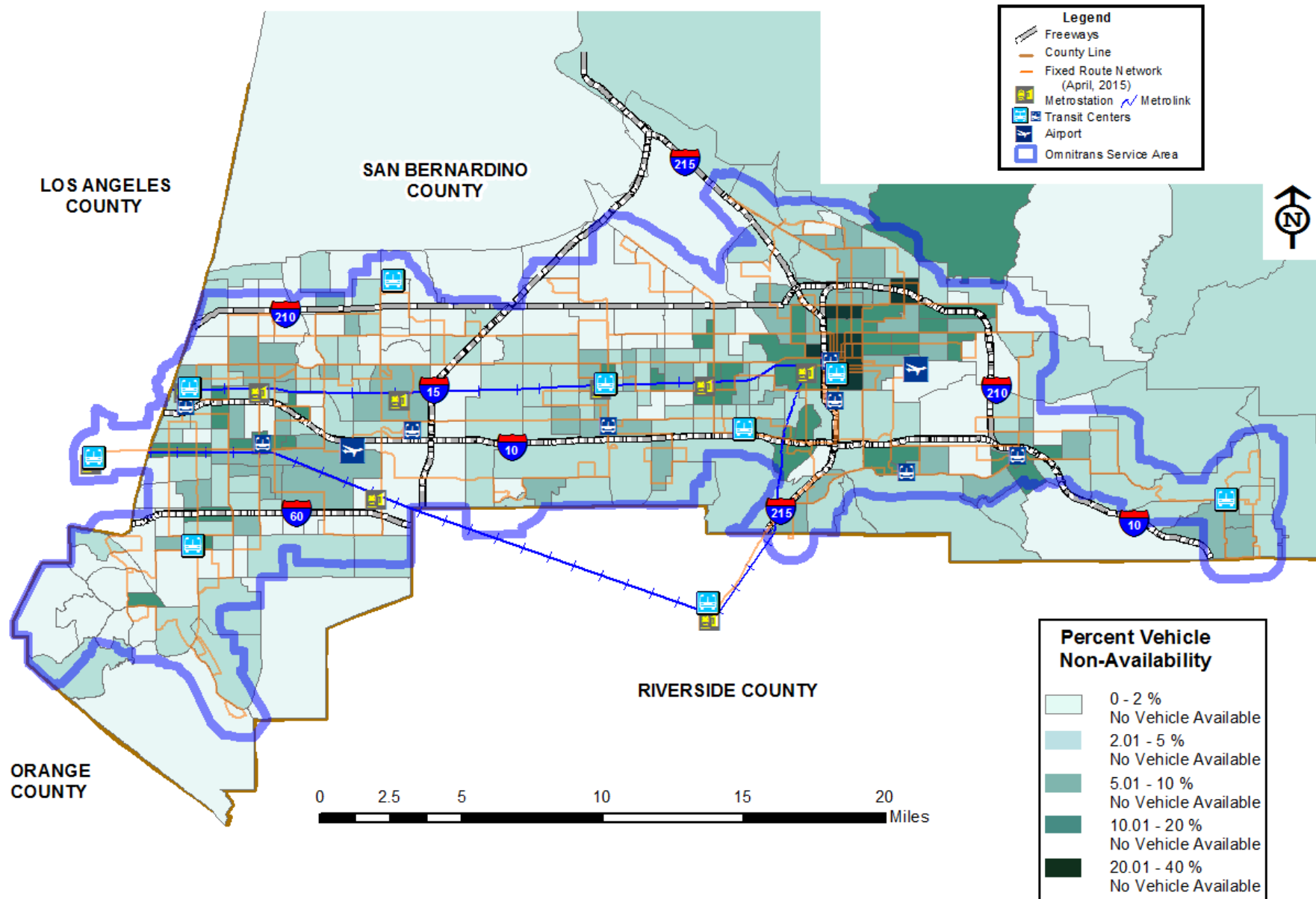
Omnitrans recognizes that ridership need is not a strict demographic function, either, but also includes the responsibility to serve public and senior housing facilities, large employers, and those who do not own an automobile (a population which is also often of lower income). Exhibit 19 and Exhibit 20 illustrate, respectively, the location of large employers and job density associated with them, and where those who do not have access to a car tend to cluster.

Exhibit 19: Distribution of Large Employers within Omnitrans Service Area: Density of Jobs per Acre by Census Block
(Data from US Census 2010)



Map created by Scott Begg

Exhibit 20: Vehicle Availability by Census Tract within Omnitrans' Service Area (Data from US Census 2010)



Applications for Financial Assistance

All current applications for federal financial assistance are for Federal Transit Administration (FTA) funds. Omnitrans is a recipient of the following FTA formula funds: Urbanized Area Formula Program (§5307); Transportation for Elderly Persons and Persons with Disabilities (§5310); Job Access and Reverse Commute Program (§5316); and New Freedom Program (§5317).

Omnitrans currently has open grants for the following discretionary funding programs under FTA: American Reinvestment and Recovery Act (ARRA §5307); Major Capital Investments (Small Starts §5309(b)(1)); Transit Planning and Research (§5314(a)) and Alternatives Analysis (§5339). Omnitrans has pending applications under the Bus and Bus Facilities Program (§5309) through the Southern California Association of Governments (SCAG).

Civil Rights Compliance Review

Annual independent audit reviews were conducted for Omnitrans from 2013 to 2015, and were performed by Vavrinek, Trine, Day & Co., LLP, certified public accountants. FTA FY2013 triennial Review (2013) was conducted by Interactive Elements Incorporated. FTA Procurement System Review (2013) was conducted by Calytpus Consulting Group, Inc.

In particular, the salient findings of the more recent audits can be detailed as follows. First, Vavrinek, Trine, Day & Co., LLP performed the agency's financial audit for year ending June 30, 2013, June 30, 2014 June 30, 2015, and the Single Audit Report on Federal Awards Program. Omnitrans received an "Unqualified Opinion" on the financial audit and was found in compliance with federal regulations for all dates mentioned. Secondly, FTA FY2013 Triennial Review (2013) found that there were no material deficiencies. Omnitrans was required to update its Paratransit fliers for the public. Thirdly, FTA PSR, conducted in 2013, found that there were no material deficiencies; there were 22 findings which required corrective action, but all were corrected and accepted by the FTA.

Procedures for filing Title VI complaints are made available to the public upon request; a copy of these procedures is also included in Appendix-B of this Title VI Report. Notification of beneficiary protection under Title VI is provided to the public; as well, the agency has updated its website so that such notification is made more fully accessible to the public. Recently, this has been greatly expanded as part of the Limited English Proficiency Policy and Language Assistance Plan, as notification of beneficiary protection under Title VI is made in seven languages determined by a Four Factor Analysis and all of which fall under Safe Harbor definition within our service area. These latest multilingual notifications are now found, readily visible to the riding public, on all Omnitrans' coaches. With respect to procedures within the agency for collecting, investigating, and tracking complaints involving issues of discrimination or Title VI, Omnitrans has in place a process for handling such complaints, one which again is extensively described in Appendix-B of this report. The software database Trapeze COM is used to file, track, follow up, and log all complaints, including any involving acts of discrimination, or those involving complaints with regard to Title VI. Trained information clerks enter and log the

complaints, and forward them to the appropriate department for investigation, incident resolution, and timely follow up contact with the customer as warranted. In this process, it is determined whether the complaint falls within the definition of a Title VI service-level complaint or not; in all cases, appropriate action is taken. This procedure is more extensively described in the section: Record of Title VI Complaint Procedure, and of Title VI Complaints, and a table listing historical complaints of such nature tracked by Trapeze COM is included in Appendix G.

Title VI Lawsuits

Omnitrans has not had any lawsuits filed against the agency based on discrimination with respect to service or other transit benefits regarding issues of Title VI compliance.

Signed Assurances

The Civil Rights Assurance can be found in Appendix-A. Omnitrans' Title VI Assurance and discrimination procedures can be found in Appendix-B.

Construction Projects

The majority of Omnitrans' construction projects fall under the class of categorical exclusion (CE) as defined in the latest Title VI circular FTA C 4702.1B, Chapter IV. Projects that do not fall under the category of CE (such as the sbX Green Line bus rapid transit project and the San Bernardino Transit Center) performed all required Environmental Assessments or Environmental Impact Statements under the close guidance of FTA officials (see individual project status for more specific information on the status of environmental clearance). These assessments have included impacts upon low-income/minority communities and mitigation/enhancement actions, which have been incorporated into the projects.

The following construction projects have either been completed during the last three years since the last Title VI Report, or are still in the process of being planned, designed or completed:

Bus Stop Improvement Program (federal funds)

In 2011, Omnitrans was awarded State funding (which was matched with FTA 5307 Transit Enhancements funds) to improve the ADA accessibility of 10 bus stops throughout Omnitrans' service area. Improvements include constructing and repairing sidewalks and concrete boarding areas.

The following bus stop improvement projects have been completed:

- Inland Regional Center and Lighthouse for the Blind, City of San Bernardino
- Foothill Blvd and Campus Ave, City of Upland
- Riverside Drive and Archibald Ave, City of Ontario
- Vineyard Ave and Foothill Blvd, City of Rancho Cucamonga
- Baker Ave and Fourth St, City of Ontario
- Euclid Ave and Fifth St, City of Ontario

The remaining bus stop improvement projects from the 2011 funding, listed below, are in the design phase and are expected to be completed in Fiscal Year 2016.

- Baseline Street and Victoria Ave, City of Highland
- Boulder Ave and Highland Ave, City of Highland
- Baseline Rd and Valeria Ave, City of Highland
- Foothill Blvd and Grove Ave, City of Upland

In 2013, Omnitrans was awarded State funding (matched with FTA 5307 Transit Enhancements funds) for 45 additional bus stop improvement projects. Improvements include constructing and repairing sidewalks and concrete boarding areas. These projects will begin the design phase in Fiscal Year 2016 and are expected to be completed in Fiscal Year 2017.

- "O" at 9th, City of Colton
- San Bernardino at Indigo, City of Colton
- C at Pennsylvania (both sides of street), City of Colton
- C at Pennsylvania, City of Colton
- San Bernardino at Sycamore, City of Colton
- San Bernardino at Eucalyptus, City of Colton
- C Street at 2nd, City of Colton
- Sultana at Transit, City of Ontario
- Campus at Holt, City of Ontario
- Vineyard at 7th, City of Ontario
- 5th at Benson, City of Ontario
- Euclid Ave at 4th, City of Ontario
- 6th Street at Grove, City of Ontario
- Euclid at Belmont, City of Ontario
- Jurupa at Etiwanda, City of Ontario
- Inland Empire at Mercedes, City of Ontario
- Euclid at Riverside, City of Ontario
- Milliken at Santa Ana, City of Ontario
- Milliken at Jurupa, City of Ontario
- Milliken at Toyota, City of Ontario
- Baseline at Meridian, City of Rialto
- Baseline at Pepper, City of Rialto
- Riverside at Senior Way, City of Rialto
- Riverside at James, City of Rialto
- Kendall at University, City of San Bernardino
- Del Rosa at Date, City of San Bernardino
- E Street at 14th, City of San Bernardino
- E Street at 18th, City of San Bernardino
- 9th at Medical Center, City of San Bernardino
- E Street at 16th, City of San Bernardino
- Waterman at 5th, City of San Bernardino
- Sierra at 16th, City of San Bernardino
- Kendall at H Street, City of San Bernardino
- 48th at 4th, City of San Bernardino
- Tippecanoe at San Bernardino, City of San Bernardino
- 9th at Western, City of San Bernardino
- Sierra at 16th, City of San Bernardino
- Sierra at 30th, City of San Bernardino
- Kendall at 48th, City of San Bernardino
- Sierra at 19th, City of San Bernardino
- San Bernardino at Hemlock, County of San Bernardino
- San Bernardino at Live Oak, County of San Bernardino
- Merrill at Beech, County of San Bernardino
- Merrill at Beech, County of San Bernardino
- San Bernardino at Redwood, County of San Bernardino

Omnitrans has also partnered with several of its member cities to provide FTA 5307 Transit Enhancement funds as matching funds for bus stop improvement projects for which the cities received State funds in 2013. Improvements include constructing and repairing sidewalks and concrete boarding areas. These project locations are listed below.

- The City of Fontana, in partnership with Omnitrans, improved the following bus stop locations. These projects were completed in 2015.

- o Walnut at Oleander - o Sierra at Ivy - o San Bernardino at Citrus - o Sierra at Walnut - o Marygold at Kempster - o Randall at Citrus - o Randall at Citrus - o Walnut at Sierra - o San Bernardino at Catawba (both sides of street) - o San Bernardino at Cypress - o Valley at Health Care Parkway - o San Bernardino at Poplar - o Citrus at Walnut	- o Juniper at Marigold - o Marygold at Juniper - o San Bernardino at Cypress - o San Bernardino at Poplar - o Jurupa at Cypress - o San Bernardino at Juniper - o Base Line at Heritage - o Sierra at Miller - o Sierra at Walnut - o Sierra at Ash - o Jurupa at Citrus - o Base line at Mid Block - o Valley at Vineyard Valley - o Randall at Oleander
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- The City of Redlands, in partnership with Omnitrans, will be improving the following bus stop locations. These projects are anticipated to be completed in Fiscal Year 2017.

- o San Bernardino at Orange - o Redlands at Iowa (both sides of street) - o Brookside at Eureka (both sides of street) - o San Bernardino at Vermont - o Orange at San Bernardino - o San Bernardino at Orange - o Orange at Pioneer (both sides of street)	- o Barton at Terracina - o Brookside at San Mateo - o Brookside at Ash (both sides of street) - o Brookside at Center (both sides of street) - o Brookside at Price - o Lugonia at Indiana Court
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- The City of Upland, in partnership with Omnitrans, will be improving the following bus stop locations. These projects are anticipated to be completed in Fiscal Year 2017.
 - o Foothill at Mulberry
 - o Foothill at Redding Way
 - o Euclid at "A"

The bus stop improvement projects are all Categorical Exemptions, as they are minor alterations to existing sidewalk. These projects provide a benefit to all the communities in which they are located, as they provide better accessibility to bus stops. The locations are

scattered throughout Omnitrans' service area and are selected based on criteria such as ridership, current condition of bus stop, available right-of-way, and cost of improvements.

Ruben Campos Park Bus Stop Improvements (non-federal funds)

Omnitrans will be using state funding to improve a bus stop in front of Ruben Campos Park on 5th Street in the City of San Bernardino. The improvements will include construction of a bus turnout, ADA accessibility improvements to the bus stop, and extension of the sidewalk in front of the park. The project is in Caltrans' right-of-way on Route 66 (5th Street) and also encroaches onto City park property. The City of San Bernardino granted an easement for the bus stop onto the park property in January 2015. The project is currently in review by Caltrans for an encroachment permit, and environmental studies are currently underway. The project is anticipated to be exempt under CEQA, but environmental screening studies are being conducted to screen for potential impacts from the removal of three palm trees (in order to construct the bus turnout) and potential cultural impacts to the historic corridor. The project is not subject to NEPA because it does not include federal funds. This project is anticipated to be completed in FY 2016.

sbX Green Line Bus Rapid Transit Project (federal funds)

The Omnitrans sbX E Street Corridor Bus Rapid Transit (BRT) Project, a Federal Transit Administration Small Starts Capital Transit Improvement Project, is a 15.7-mile-long project that connects the northern portion of the City of San Bernardino with the City of Loma Linda. Major destinations along the corridor include California State University at San Bernardino (CSUSB), downtown San Bernardino, the Hospitality Lane Central Business District, the Loma Linda University Medical Center and the VA Hospital. The sbX Project is a combined side and center-running BRT containing segments of exclusive lanes and mixed-flow lanes. The sbX Project includes 16 station stops, spaced approximately 1-mile apart to facilitate higher operating speeds. Traffic Signal Priority (TSP) applications are also being used at selected intersections to further facilitate faster and more reliable bus operations. The Project also includes improvements to E Street to accommodate exclusive BRT operations, 14 new low-floor, five-door BRT Compressed Natural Gas (CNG) articulated buses and 4 park-n-ride facilities. The project also included an expansion of the Vehicle Maintenance Facility, which was completed in June of 2015.

Omnitrans began an Alternatives Analysis in early 2004 to evaluate transportation options in a corridor served by Omnitrans Route 2, at that time the highest performing bus route in the Omnitrans system. Omnitrans considered a variety of transit alternatives to serve the corridor from the CSUSB campus, through downtown San Bernardino, and south to Loma Linda. In December 2005, local stakeholders selected an exclusive guideway BRT as the locally preferred alternative. During 2005 and 2006, Omnitrans worked with local stakeholders to identify funding sources and station locations. FTA approved the project into project development in December 2007, and issued a Finding of No Significant Impact (FONSI) in September 2009. Omnitrans received a Project Construction Grant Agreement from the FTA in September 2011. Construction of the sbX Project began in January 2012, and the sbX Green Line bus rapid transit service began revenue operation April 28, 2014.

Service operates at 10-minute headways during weekday peak periods and 15 minute off-peak headways. The sbX Project is providing improved transit service and amenities for a large number of existing transit riders, as well as new riders. Many residents in the corridor have low incomes or are transit-dependent: 27 percent of the population lives below the poverty line and 16 percent of the households in the corridor do not have an automobile. The Corridor is home to about 138,200 people and more than 74,600 jobs. The Omnitrans sbX improves travel time for existing transit riders in San Bernardino and Loma Linda, and serves as the centerpiece for economic development efforts in the region.

San Bernardino Transit Center (federal funds)

The San Bernardino Transit Center will be a multi-modal transportation hub in the downtown of the City of San Bernardino, at Rialto Avenue and “E” Street. It will serve 13 local bus routes, sbX bus rapid transit, Metrolink, and other regional transit providers. SANBAG is leading the project through a pass-through funding agreement with Omnitrans. The Transit Center will be open to the public in September 2015, to be followed by an extension of the Metrolink rail line to the Transit Center in 2016.

An environmental assessment was completed for the San Bernardino Transit Center jointly with the Downtown San Bernardino Passenger Rail project. A Finding of No Significant Impact (FONSI) was issued by the FTA in October 2012. The Environmental Justice / Title VI analysis found that a higher-than-average proportion of minority and low-income populations resides in the project area. The project will not disparately impact this population; rather it will provide a benefit by improving upon the availability of multimodal, connected transportation options.

Omnitrans plans to seek private partners for transit-oriented development on the 2-acre Omnitrans-owned parcel at the corner of E Street and Rialto Avenue at the Transit Center.

West Valley Connector Corridor (federal funds)

The West Valley Connector Corridor is a bus rapid transit (BRT) project that will serve the cities of Fontana, Montclair, Ontario, and Rancho Cucamonga (within Omnitrans’ service area in San Bernardino County) as well as the City of Pomona (in Los Angeles County). The project is a 25-mile-long corridor that includes enhanced stops/stations, real-time arrival signage, surveillance and security systems, and transit signal priority systems. The project includes widening 3.5 miles of Holt Boulevard in the City of Ontario to construct dedicated bus lanes. There are 27 proposed station locations, including at three existing multimodal transit centers/Metrolink stations (Pomona, Rancho Cucamonga, and Fontana). The project will include improvements at the existing Ontario Mills Mall Transfer Center. The BRT line is projected to increase corridor ridership by 30-40% near-term and reduce travel time by 17-19% compared to local bus service.

An Alternatives Analysis for the West Valley Connector Corridor was begun in January 2013 and completed (received and filed by the Board of Directors) in April 2015. Preliminary design and environmental clearance will begin for the project in October 2015. The environmental document is expected to consist of an Environmental Assessment/Mitigated Negative Declaration and is expected to be completed in late 2016. The overall project is expected to be completed in 2021.

Ontario Civic Center Transit Station (federal funds)

The City of Ontario managed the Ontario Civic Center Transit Station through a pass-through funding agreement with Omnitrans. The project consisted of relocating two bus stops, removing two bus shelters, and installing 10 new bus shelters along Holt Boulevard, Euclid Avenue, D Street, and Sultana Avenue in the Civic Center (downtown) area of Ontario. The new shelters are brick structures that match the existing shelters along Holt Boulevard and integrate with the architecture of the downtown area. The project was completed in November 2012.

Yucaipa Transit Center (federal funds)

Phase I of the Yucaipa Transit Center, a partnership between the City of Yucaipa and Omnitrans, was completed in June 2010. It consists of 8 bus bays, benches, shelters, information kiosks, landscaping, public art, clock tower, fountain, and is located in the civic center of Yucaipa adjacent to the City Hall. It serves as a transfer point for Omnitrans fixed route 19 and OmniGo circulator routes 308, 309 and 310.

Phase II of the Yucaipa Transit Center used the funds remaining from Phase I to create a permanent solution for a steep hillside on the north side of the transit center that has created safety concerns. The project included extending the underground storm drain system, grading, and construction of an expanded parking area. The project was completed in March 2015.

Rialto Metrolink Improvements (federal funds)

The City of Rialto is acquiring property adjacent to the existing Metrolink station parking lot to construct 128 new parking spaces in addition to the existing 175 spaces. The project also includes the construction of a bus bay for Omnitrans Route 22, which currently stops on the street on Riverside Avenue. The City is managing this project through a pass-through funding agreement with Omnitrans. Environmental clearance for the project has been completed; the project is a categorical exemption under NEPA. The project is expected to be completed by mid-2016.

Chino Transit Center (federal funds)

Phase I of the Chino Transit Center was completed in January of 2005. The Chino Transit Center, on City-owned property adjacent to City Hall in downtown Chino, includes seven bus bays with custom shelters, information kiosks, and a Coach Operator restroom facility. Phase II of the Chino Transit Center will include crosswalk safety improvements, safety lighting, and re-paving of the public park-and-ride lot. The City of Chino is managing this project under a pass-through funding agreement with Omnitrans. Phase II is anticipated to be completed in Fiscal Year 2017.

PROGRAM SPECIFIC REQUIREMENTS

Demographic & Service Profile

Maps showing the transit services provided in the San Bernardino Valley with overlying data illustrating the location of low-income and minority populations were provided in the preceding section of this report. Specifically, these items are in Exhibit 9, Exhibit 10, Exhibit 11, Exhibit 12, Exhibit 13, and Exhibit 14 above. Services provided are also shown in a map of larger 3'x4' format sent separately as an attachment to this report.

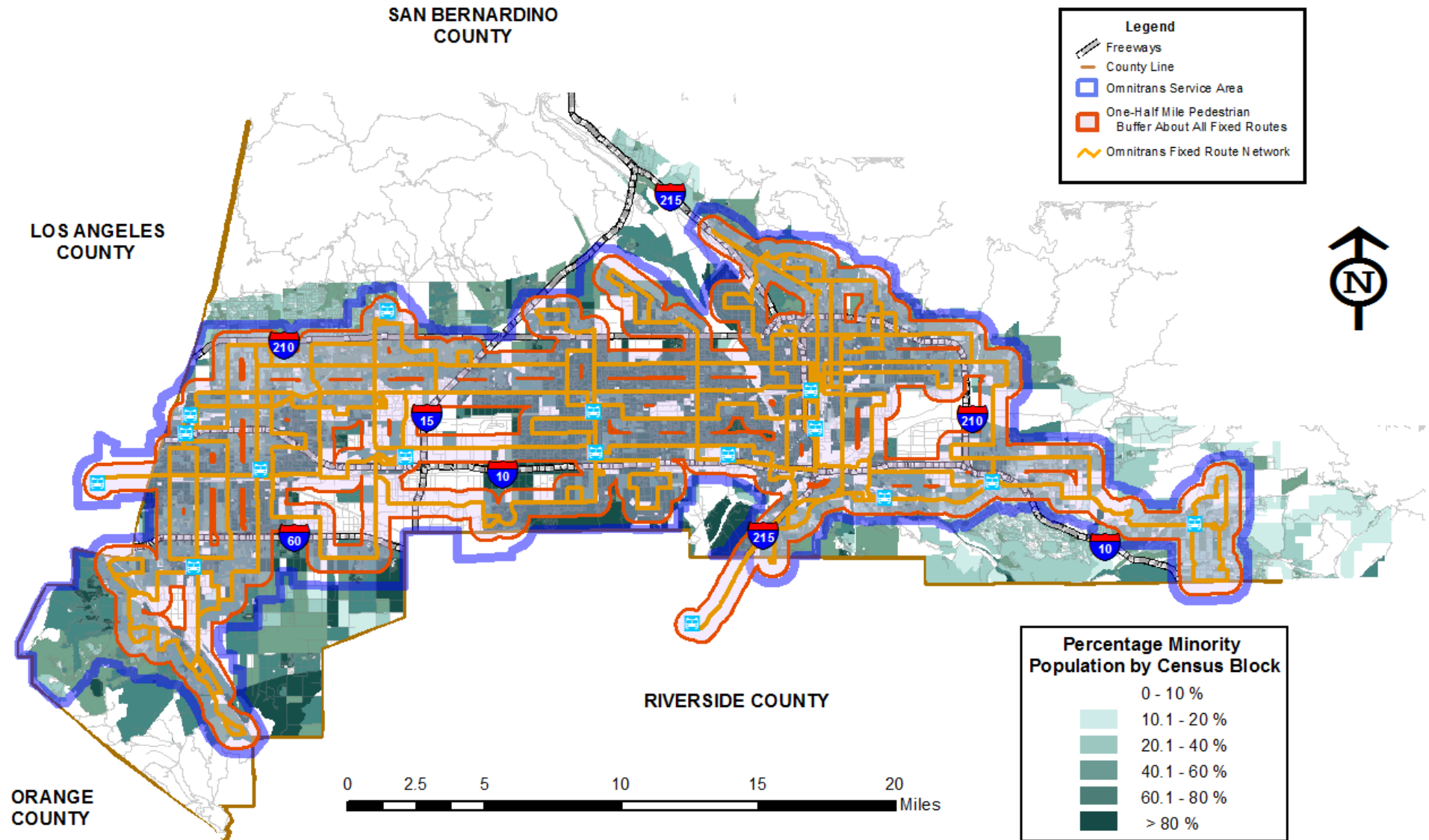
Appendix-F provides a table describing the Minority and Low Income White (LIM) Populations by census tract. Based on these data from the 2010 census and American Community Survey, 75.8% of the population in Omnitrans' service area (as defined by JPA City limits) is low-income/minority (LIM) which is greater than the county LIM share; and 77.9% of the population of our ADA / Access Service Area is similarly defined as LIM, also greater than the county LIM share.

Exhibit 21 shows the LIM share and Non-LIM share of Omnitrans' Fixed Route service by frequency of service. Within $\frac{3}{4}$ of a mile buffer of Omnitrans Fixed Route network, the LIM share is 78.1%. When looking at a slightly smaller walking buffer of $\frac{1}{2}$ -mile, the LIM share raises slightly to 78.8%. When looking only at higher frequency service with 30-minute or better headways, the LIM share rises to 80.4%. Looking at even more frequent service with 15-minute frequency, the LIM share rises even higher to 85.2%. Although 10-minute service does not continue this ever-increasing trend, it is still compliant as its LIM share is 81.1%. This illustrates that Omnitrans is providing high levels of service to the LIM community. The mapped $\frac{1}{2}$ -mile buffer itself can also be seen in Exhibit 22.

Exhibit 21: LIM and Non-LIM Populations by Omnitrans Service Area

COMPARISON TO ROUTES	TOTAL POP	Minority	% Minority	Low-Income White (Adjusted)	LIM	% LIM
3/4-Mile of Any Fixed Route (May, 2015)						
Within	1,349,581	1,007,624	74.7%	46,181	1,053,805	78.1%
Not-Within	685,629	349,988	51.0%	21,669	371,657	54.2%
County Total	2,035,210	1,357,612	66.7%	67,850	1,425,462	70.0%
1/2-Mile of Any Service						
Within	1,260,653	951,182	75.5%	42,516	993,698	78.8%
Not Within	774,557	406,430	52.5%	25,334	439,100	56.7%
1/2-Mile of 10-, 15-, 30-Minute Service						
Within	783,819	601,962	76.8%	27,981	629,943	80.4%
Not-Within	1,251,391	755,650	60.4%	39,869	795,519	63.6%
1/2-Mile of 10-, 15-Minute Service						
Within	432,529	353,142	81.6%	15,506	368,648	85.2%
Not-Within	1,602,681	1,004,470	62.7%	52,344	1,046,852	65.3%
1/2-Mile of 10-Minute Service (sbX)						
Within	47,580	36,264	76.2%	2,317	38,581	81.1%
Not-Within	1,987,630	1,321,348	66.5%	65,533	1,381,811	69.5%

Exhibit 22: Percent Minority Population within a ½-Mile Walking Buffer of Omnitrans Service



Service Standards and Policies

Omnitrans' load standards vary depending on service and time frame. Omnitrans' load standard for local fixed route is 120% of the seating available on the vehicle during peak periods. All other service and time periods the capacity is 100% of the seating available. The details can be seen in Exhibit 23 (taken from OmniConnects FY2015-2020 SRTF Performance Measures and Standards).

Exhibit 23: Vehicle Load Standards

Service	Load Factor	
	Peak	Off Peak
Local Fixed Route & OmniGo Service	120%	100%
Freeway Express	100%	100%
ACCESS	100%	100%
Bus Rapid Transit (sbX Green Line)	150%	100%

The front axle load weight limits for Omnitrans' 40' New Flyer buses permit 40 seated and 22 standing passengers, which is equivalent to 150% vehicle load. However, for enhanced passenger safety and comfort, the maximum planned passenger loads per bus is set to be 120% of the seated capacity for local service and 100% for Access and freeway express routes. These standards prescribe the maximum capacity of the bus taking into account various wheelchairs on board that are presented in Exhibit 24.

Exhibit 24: Maximum Occupancy by Bus Type and Number of Wheelchairs

Bus Type	Peak	Off Peak	Peak	Off Peak	Peak	Off Peak
	No Wheelchairs		1 Wheelchair		2 Wheelchairs	
40' Low Floor (New Flyer)	48	43	45	40	41	36
33' Midsize Low Floor (Thomas)	32	29	29	26	24	21
60' Articulated Low Floor (XN60 New Flyer)	58	40	53	37	50	34

A summary of our Fixed Route Revenue Vehicles is provided in Exhibit 25. Since the last Title VI update, Omnitrans has retired our TMC and Orion coaches and our fixed route fleet is made up of only New Flyer and Thomas vehicles.

Exhibit 25: Fixed Route Vehicle Summary

Vehicle Type	Manufacture Date	Number in Fleet	Vehicle Length (Ft.)	Seats Available	Fuel Type
New Flyer	2001 - 2014	175	40.8	39	CNG
New Flyer Hybrid	2000	3	40	39	Gas / Electric
Thomas	2003	3	32.9	26	CNG
Articulated New Flyer	2012	14	60	40	CNG

To assure routes do not become overcrowded, upgraded frequencies are provided when the average route load exceeds standard. Vehicle load is assessed through an automatic passenger count system. As seen in Exhibit 26, from APC sampled data taken for runs over entire weekdays, peak period service data indicated that all routes fell within standards. As well, for off-peak period service, data indicated that no routes fell outside of vehicle load standards.

Exhibit 26: Average Peak Loads by Time Period (May 2014 to April 2015)

Route	AM Peak		Midday		PM Peak		Evening		Night	
	Load	Ratio	Load	Ratio	Load	Ratio	Load	Ratio	Load	Ratio
1	14	34%	19	48%	17	44%	13	33%	8	21%
2	14	36%	22	54%	19	48%	13	32%	8	20%
3	11	27%	13	33%	13	33%	12	29%	10	26%
4	15	37%	14	35%	11	28%	9	23%	8	19%
5	13	33%	16	40%	15	37%	9	24%	9	22%
7	11	28%	15	38%	12	31%	9	22%	NA	NA
8	17	42%	18	45%	16	41%	10	26%	9	21%
9	26	64%	21	52%	20	51%	12	31%	NA	NA
10	16	39%	17	42%	15	37%	12	31%	NA	NA
11	14	35%	17	42%	14	36%	12	30%	9	23%
14	19	47%	21	53%	22	54%	22	55%	20	50%
15	18	46%	18	46%	16	41%	10	25%	9	22%
19	15	36%	17	44%	16	41%	12	31%	10	26%
20	6	15%	7	16%	6	16%	5	13%	10	26%
22	8	20%	12	31%	11	28%	7	17%	4	10%
29	7	17%	8	20%	6	14%	1	3%	NA	NA
61	22	55%	21	52%	22	56%	20	51%	16	39%
63	9	22%	9	23%	9	22%	5	13%	NA	NA
65	13	31%	14	36%	15	37%	9	22%	5	14%
66	17	43%	17	42%	17	42%	15	37%	11	28%
67	12	30%	11	28%	13	32%	9	22%	NA	NA
68	13	33%	15	37%	14	36%	9	21%	7	18%
80	16	40%	18	45%	17	42%	12	29%	NA	NA
81	14	35%	14	34%	14	35%	8	21%	5	13%
82	16	39%	17	43%	15	37%	9	21%	NA	NA
83	12	29%	12	30%	11	28%	6	15%	7	17%
202 (sbX)	9	20%	14	32%	10	21%	6	14%	NA	NA
215	15	37%	18	46%	22	55%	14	35%	8	20%

Exhibit 27 shows coach assignments by division. Omnitrans newest buses that have been ordered since the last Title VI update have been dispersed though both Omnitrans East Valley and West Valley Division.

Exhibit 27: Fixed Route Vehicle Series Type Assignments by Division

Series Type	Year - Make - Model	Active Coaches		Total
		East Valley	West Valley	
500	2003 Thomas SLF232G	0	3	3
00H	2000 New Flyer GE40LF	3	0	3
0100	2001 New Flyer C40LF	7	19	26
0130	2001 New Flyer C40LF	11	0	11
0150	2003 New Flyer C40LF	13	8	21
0180	2005 New Flyer C40LF	23	0	23
1201	2009 New Flyer C40LF	27	0	27
1231	2011 New Flyer C40LF	0	9	9
1241	2011 New Flyer C40LF	0	8	8
1250	2012 New Flyer XN40	12	8	20
1280	2014 New Flyer XN40	9	7	16
6001	2012 New Flyer XN60	14	0	14
	TOTAL	119	62	181

Exhibit 28 shows vehicle assignments for our contract service fleet, which is employed for our demand response service as of March, 2015.

Exhibit 28: Contract Services Vehicle Series Type Assignments by Division

Year - Make - Model	Active Coaches		
	East Valley	West Valley	Total
2004 Ford Aerotech	7	10	17
2006 Ford Starcraft	11	2	13
2007 Ford Aerotech	4	10	14
2008 Ford Starcraft	19	12	31
2010 Ford Starcraft	4	2	6
2008 Chevrolet Uplander	8	1	9
2012 Ford Starcraft	8	8	16
Total	61	45	106

Systemwide service standards for these and other criteria, including but not limited to headways, loads, on-time performance, service availability, distribution of amenities, etc. are printed in OmniConnects, Omnitrans' Short Range Transit Plan. A copy of this document is made available for the general public and is found on Omnitrans' website (<http://www.omnitrans.org>).

Vehicle Assignment

Dispatchers assign coaches to their routes each day based upon three factors: route size, coach operator access to vehicles, and the need to collect ridership data. Omnitrans implemented an automatic passenger counting (APC) system to collect NTD data as well as general ridership/on-time performance data in October 2000. This was enhanced by the addition of a Siemens radio

data system in late 2006. The APCs have been installed on 27 coaches in Omnitrans' fleet; these coaches are randomly assigned on a daily basis to the different routes so that sufficient data may be collected over time for all fixed routes.

The APC needs aside, 40-foot coaches are currently assigned to all routes; the only exception to this rule is the 33-foot Thomas buses, which are assigned as needed to the lowest productivity routes in West Valley. All fixed route vehicles are low-floor coach models, which do not require a lift for wheelchairs or scooters, but instead use a ramp. On the new sbX Green Line, 60-foot articulated vehicles are used as well; each of these articulated vehicles is low-floor with the capacity to board and alight on both sides of the vehicle. All coaches (30-, 40-, and 60-foot models) have bicycle racks; the 30- and 40-foot models are external in configuration, while the 60-foot articulated coaches have bicycle racks inside the vehicle.

Aside from the greater seating capacity of the larger coaches, all passenger amenities are comparable (including wheelchair lifts/ramps, air conditioning, and kneeling/low-floor features on all coaches) and thereby provide the same riding environment to passengers in minority communities as to those from other areas. As well, on all Omnitrans vehicles, video cameras have been added for security measures.

In 1996, Omnitrans began implementing new fueling technologies by buying coaches that run on Compressed Natural Gas (CNG). By 2009, the fleet of diesel coaches had been fully replaced by CNG vehicles. East and West Valley facilities have fueling stations (San Bernardino and Montclair, respectively) which have been upgraded to accommodate liquefied natural gas that is compressed on-site for use in Omnitrans CNG vehicles.

Vehicle Headways

General standards for headways are based on three factors: riders per revenue hour, farebox recovery ratio, and funding availability. Omnitrans also looks at vehicle load to assess if higher frequencies are needed to meet demand and density/development concentrations. The service standards/guidelines Omnitrans uses to determine if more frequency or a greater level of service is needed are developed and approved within each Short Range Transit Plan. The most recent plan was the OmniConnects Short Range Transit Plan covering FY2015-2020.

Omnitrans holds public forums and considers requests for service by the public, social service agencies, medical facilities, colleges, and businesses to establish headways for existing and new routes. Because minority communities represent Omnitrans' primary ridership, these neighborhoods often feature routes with shorter vehicle headway times, providing at least as high a level of access to transit services as that enjoyed by non-minority communities.

Transit Amenities

Omnitrans conducted a spatial analysis of transit stops and stop amenity placement to verify compliance with Title VI. The results of this analysis show that Omnitrans does not discriminate against LIM populations. The proportion of LIM population within a one-half-mile walking

distance from all fixed route stops exceeds that of the surrounding region (78.9% versus 70.0%). The situation becomes progressively better as well as amenities increase: the proportion of LIM population residing within one-half mile of all stops with benches also exceeds that of the surrounding area (80.3% versus 70.0%), and the proportion of LIM population residing within one-half mile of all stops with shelters exceeds that of the surrounding area (82.6% versus 70.0%). Details of this analysis can be seen in Exhibit 29. The mapping of this analysis can be seen in Exhibit 30, Exhibit 31, Exhibit 32, and Exhibit 33.

The level of transit amenities at a given stop is determined on a stop-by-stop basis. All stops have at minimum a sign designating which routes serve that stop and NexTrip, a source for real time customer service contact information and up-to-the-minute arrival times for any Omnitrans bus at any stop. Additional amenities such as shelters, benches, trash containers, and route schedule postings are added depending on individual stop needs. As a result, more than one amenity will frequently be associated with a single stop.

Exhibit 29: LIM & Non-LIM Populations Served by Omnitrans Bus Stops

COMPARISON TO STOPS	TOTAL POP	Minority	% Minority	Low-Income White (Adjusted)	LIM	% LIM
3/4-Mile of Any Stop (May, 2015)						
Within	1,343,290	1,003,529	74.7%	45,885	1,049,414	78.1%
Not-Within	691,920	354,083	51.2%	21,669	375,752	54.3%
County Total	2,035,210	1,357,612	66.7%	67,850	1,425,462	70.0%
1/2-Mile of Any Stop						
Within	1,251,472	945,370	75.5%	42,243	987,613	78.9%
Not Within	783,738	412,242	52.6%	25,607	444,992	56.8%
1/2-Mile of Stops with Benches						
Within	978,837	754,084	77.0%	32,363	786,447	80.3%
Not-Within	1,056,373	603,528	57.1%	35,487	639,015	60.5%
1/2-Mile of Stops with Shelters						
Within	686,694	546,363	79.6%	21,072	567,435	82.6%
Not-Within	1,348,516	811,249	60.2%	46,778	846,362	62.8%

In addition to boardings per day as a criterion, placement of amenities is governed by accessibility standards. If a stop would be deemed inaccessible by the placement of a shelter at a certain location, no shelter will be placed there until/unless the government agency or property owner responsible makes improvements to the site that allowed for a clear path of travel around a shelter, or until Omnitrans is able to gain approvals to make the improvements.

In March, 2009 Omnitrans was authorized to purchase Bus Stop Manager (BSM), a database software program compatible with software currently used by Omnitrans for bus route planning. BSM has since allowed for easier tracking and managing of bus stops and amenities.

Exhibit 30: Fixed Route Bus Stops and Percent Minority Population within Omnitrans Service Area

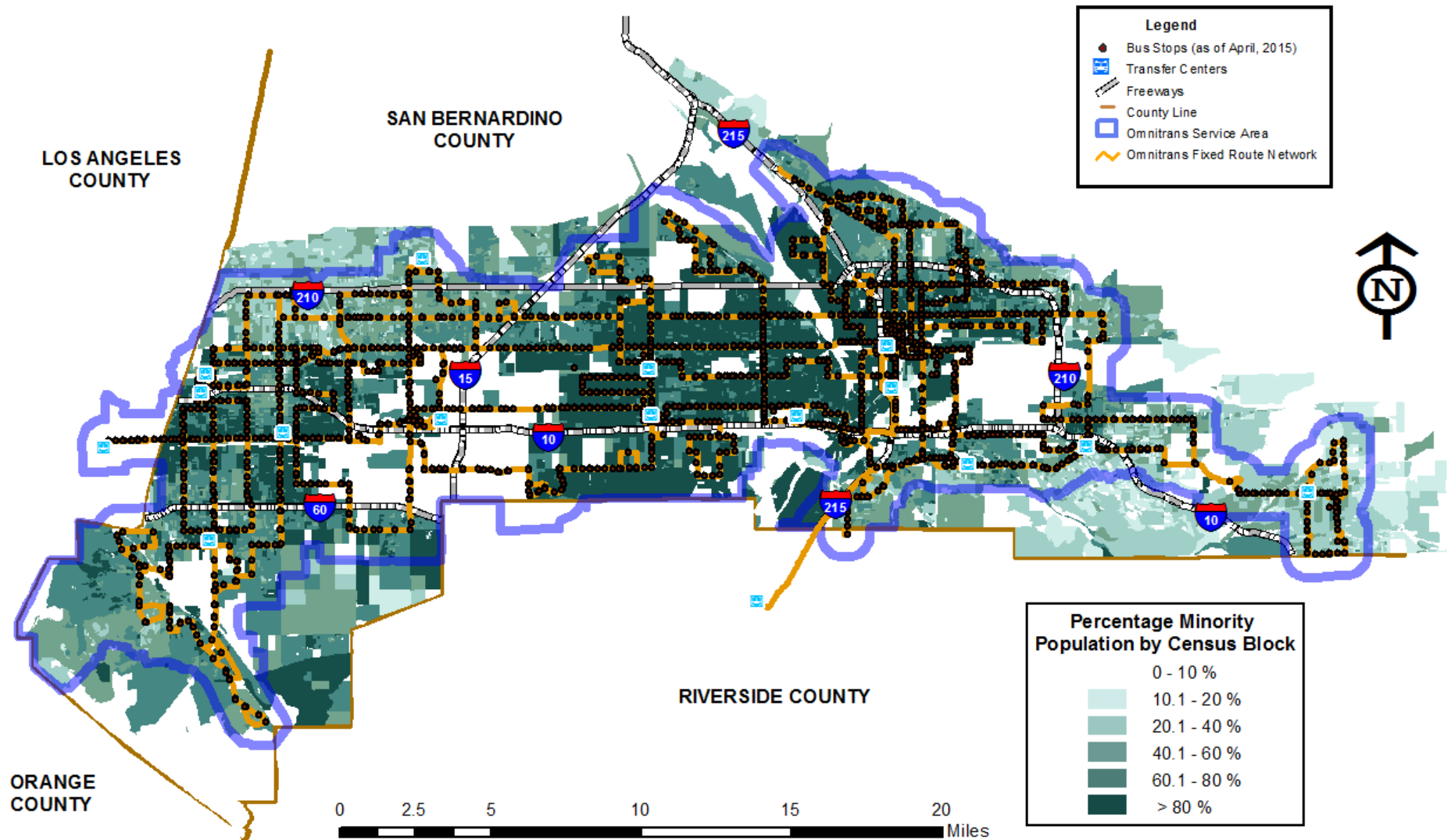


Exhibit 31: Fixed Route Bus Stops with ½-mile Walking Buffer of Omnitrans Routes and Percent Minority Population

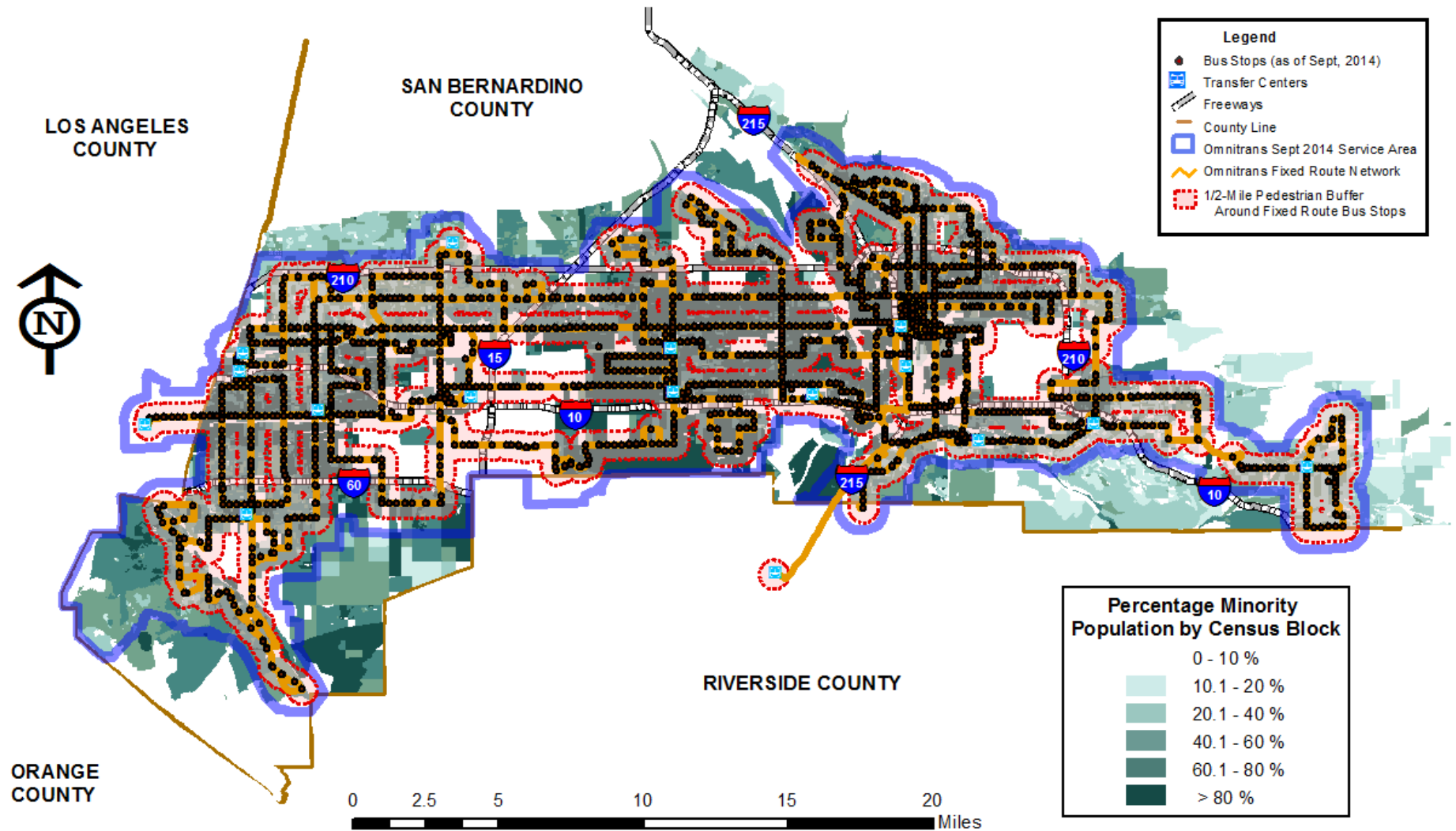


Exhibit 32: Fixed Route Bus Stops with Benches and Percent Minority Population within Omnitrans Service Area

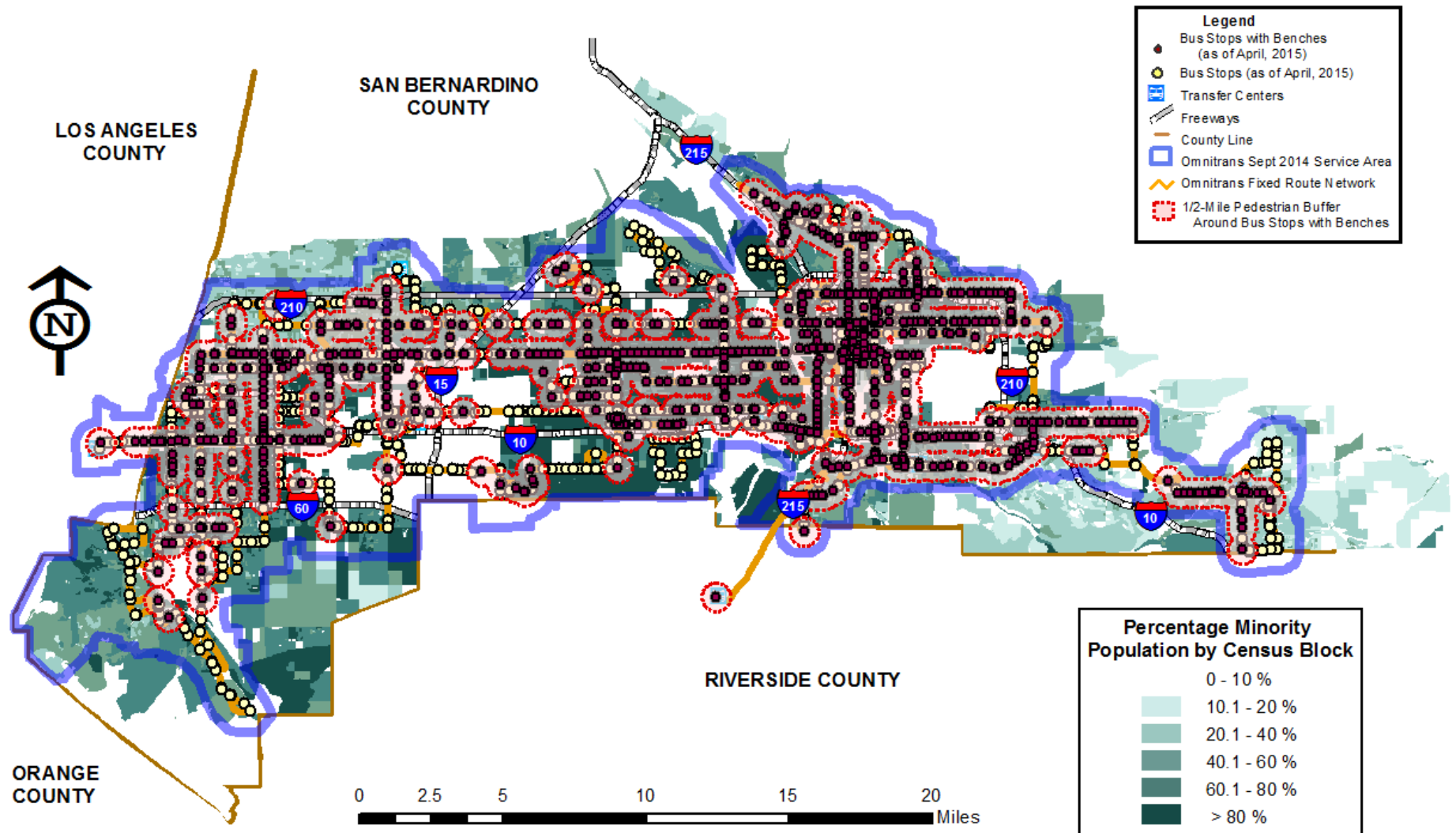
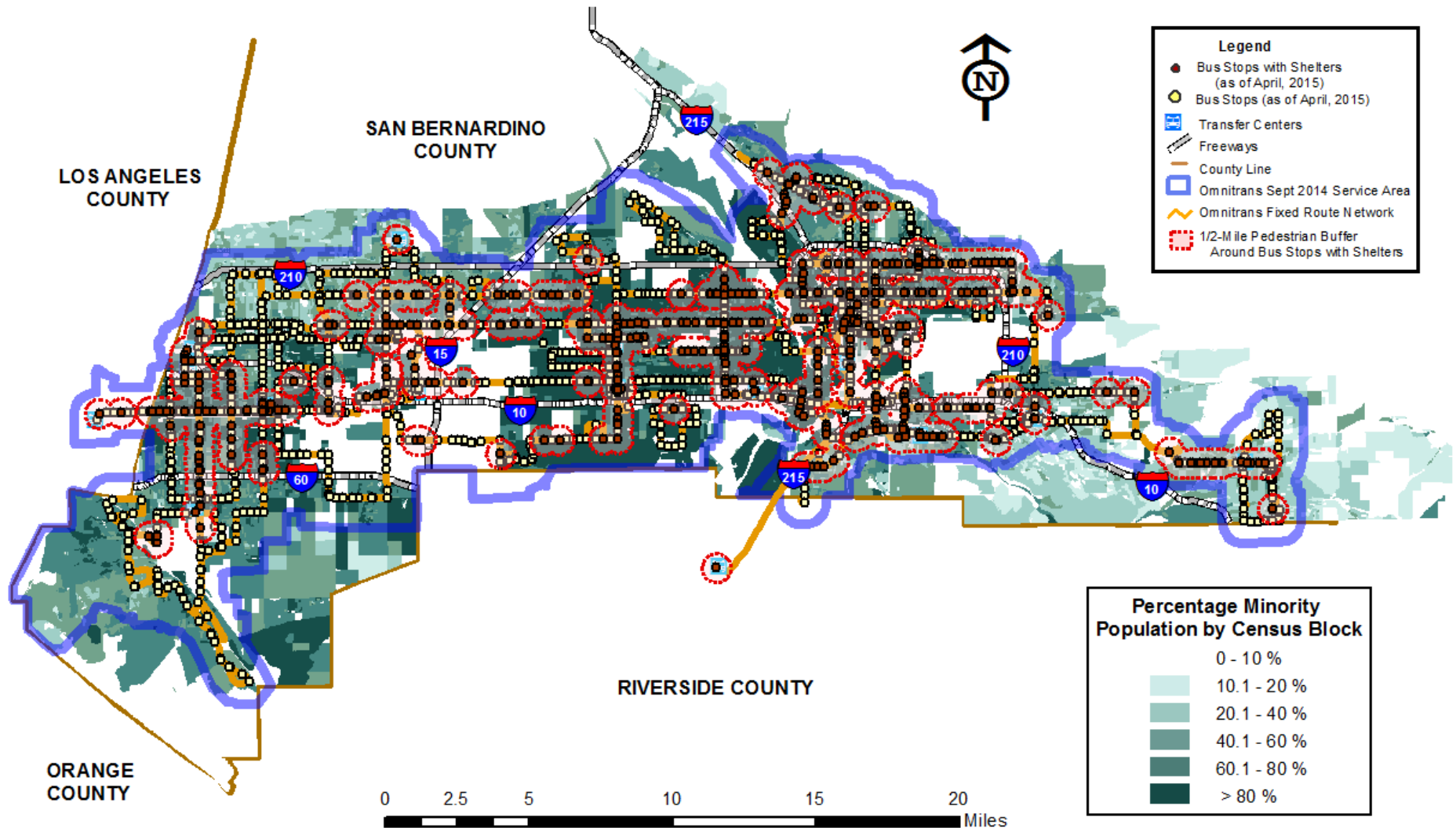


Exhibit 33: Fixed Route Bus Stops with Shelters and Percent Minority Population within Omnitrans Service Area



Currently, Omnitrans has 2,537 stops. Of these, Omnitrans has 953 stops with benches (38%) and 483 stops with shelters (19%). Details by city can be seen in Exhibit 34.

Exhibit 34: Bus Stops and Bus Stop Amenities by City

City	Stops	Amenities	
		Benches	Shelters
Chino	103	16	19
Chino Hills	48	2	0
Colton	91	41	24
Fontana (city limits and sphere)	326	114	66
Grand Terrace	22	9	7
Highland	73	42	15
Loma Linda	62	35	24
Montclair	80	23	26
Ontario	249	54	36
Pomona	16	3	4
Rancho Cucamonga	238	85	40
Redlands	101	44	12
Rialto	159	56	55
San Bernardino	601	314	126
San Bernardino County (no city)	165	34	11
Upland	120	52	1
Yucaipa	81	27	16
Other (Riverside County)	2	2	1
Total	2,537	953	483

Transit Accessibility

Omnitrans bus stops are typically placed every two-tenths of a mile along a route depending on the operational access and safety. Stops are placed adjacent to concentrated commercial, residential, and industrial developments or at intersections of arterial or major collector streets. All stops are clearly marked with route information, as required by the Americans with Disabilities Act. Total population and population and employment densities in terms of residents and jobs per acre are used to decide new route placement.

Direct requests for service aid Omnitrans in refining its fixed route service. These requests come in the form of telephone calls, letters, customer comment cards, onboard surveys, triennial Attitude and Awareness surveys, comments through the Omnitrans website, testimony, and public hearings. Requests for new service are considered if at least one of the following conditions is met: (1) the distance from an existing route is greater than ½ mile, (2) the business district has more than 500 workers or retail centers have more than 400,000 square feet of leasable space, or (3) data shows that there will be 20 or more passengers per hour using the system. The requests that meet these standards are plotted on a map and if there is sufficient funding, route alignments are developed.

In addition, Omnitrans uses a number of performance indicators including: on-board survey data, on-time performance reports, monthly ridership statistics, contractors' monthly reports, Agency financial records, over-time reports, maintenance records, missed trip records, and monthly pass and ticket sales to determine if passengers' needs are being met. These reports indicate to staff if new or additional service should be introduced. As many minority communities in Omnitrans' service area tend to be demographically dense, these communities will tend to receive greater transit access and higher frequencies in most cases.

OTHER AREAS OF CONSIDERATION

Changes in Service Features

Besides routing, the key defining service characteristics of fixed route service are frequency/headway and service span. Omnitrans Fixed Route Headways as of May 2015 are presented in Exhibit 35 and the service span is presented in Exhibit 36

Exhibit 35: Omnitrans Fixed Route Headways by Route as of May 2015

Route		Route Name	Weekday	Headways Saturday	Sunday
Fixed Route EAST VALLEY					
1	ARMC-San Bernardino-Del Rosa	15/30	30	30	
2	Cal State-E Street-Loma Linda	15/30	20	20/30	
3	Baseline-Highland-San Bernardino	15/20	20	20	
4	Baseline-Highland-San Bernardino	15/20	20	20	
5	South Waterman-Del Rosa-Cal State	30	60	60	
7	N. San Bernardino-Sierra Way-San Bernardino	30/60	60	60	
8	San Bernardino-Mentone-Yucaipa	30/60	60	120	
10	Fontana-Baseline-San Bernardino	30/60	60	60	
11	San Bernardino-Muscoy-Cal State	30/60	60	60	
14	Fontana-Foothill-San Bernardino	15	15/30	15	
15	Fontana-San Bndo/Highland-Redlands	30	60	60	
19	Yucaipa-Redlands-Colton-Fontana	30	60	60	
20	Fontana Metrolink-Via Hemlock-Kaiser	30	60	60	
22	North Rialto-Riverside Ave-ARMC	30	60	60	
29	Bloomington-Valley Blvd-Kaiser	60	60	n/a	
215	San Bernardino-Riverside	20/30	60	60	
308/309	OmniGo Yucaipa	30	30	60	
310	OmniGo Yucaipa	30	n/a	n/a	
325	OmniGo Grand Terrace	70	70	70	
202 (sbX)	Green Line (CSUSB - VA Hospital)	10/15	n/a	n/a	
Fixed Route WEST VALLEY					
61	Fontana-Ontario Mills-Pomona	15	15	15	
63	Chino-Ontario-Upland	60	60	60	
65	Montclair-Chino Hills	60	60	60	
66	Fontana-Foothill-Montclair	15/30	30	30	
67	Montclair-Baseline-Fontana	60	n/a	n/a	
68	Chino-Montclair-Chaffey College	20/40	60	n/a	
80	Montclair-Ontario Conv Ctr-Chaffey College	60	60	60	
81	Ontario-Ontario Mills-Chaffey College	60	n/a	n/a	
82	Rancho Cucamonga-Fontana-Sierra Lakes	60	60	60	
83	Upland-Euclid-Chino	60	60	60	
365	OmniGo Chino Hills	60	60	60	

Exhibit 36: Omnitrans Fixed Route Service Span by Route as of May 2015

Route		Route Name	Weekday	Service Span Saturday	Sunday
Fixed Route EAST VALLEY					
1	ARMC-San Bernardino-Del Rosa	4:50-23:01	6:07-21:00	6:07-19:25	
2	Cal State-E Street-Loma Linda	4:30-23:15	6:30-21:58	6:30-20:21	
3	Baseline-Highland-San Bernardino	4:40-23:26	6:01-20:54	6:09-19:15	
4	Baseline-Highland-San Bernardino	4:30-22:42	6:14-20:54	6:14-19:24	
5	San Bernardino-Del Rosa-Cal State	4:45-22:38	6:33-21:17	6:33-19:34	
7	N. San Bernardino-Sierra Way-San Bernardino	6:05-19:49	7:16-18:35	8:05-17:48	
8	San Bernardino-Mentone-Yucaipa	4:50-22:01	6:20-19:31	7:22-19:05	
10	Fontana-Baseline-San Bernardino	5:10-20:18	6:20-19:25	7:20-18:18	
11	San Bernardino-Muscoy-Cal State	5:28-22:17	6:50-18:44	7:17-19:22	
14	Fontana-Foothill-San Bernardino	3:48-23:09	6:05-22:28	6:05-19:24	
15	Fontana-San Bndo/Highland-Redlands	5:12-22:39	7:14-19:32	6:37-19:32	
19	Yucaipa-Redlands-Colton-Fontana	4:50-22:28	5:20-19:53	6:40-19:13	
20	Fontana Metrolink-Via Hemlock-Kaiser	4:48-21:15	6:26-18:26	6:56-17:56	
22	North Rialto-Riverside Ave-ARMC	5:00-22:23	7:35-18:59	6:35-19:35	
29	Bloomington-Valley Blvd-Kaiser	6:45-18:35	7:45-18:35	n/a	
215	San Bernardino-Riverside	5:05-22:00	6:35-22:00	7:05-19:30	
308/309	OmniGo Yucaipa	5:56-20:40	7:00-20:25	7:30-18:39	
310	OmniGo Yucaipa	5:45-19:39	n/a	n/a	
325	OmniGo Grand Terrace	5:12-20:26	7:17-18:14	8:27-18:14	
202 (sbX)	Green Line (CSUSB - VA Hospital)	6:00-20:00	n/a	n/a	
Fixed Route WEST VALLEY					
61	Fontana-Ontario Mills-Pomona	4:20-23:12	5:55-22:34	6:05-19:49	
63	Chino-Ontario-Upland	5:45-20:36	6:43-18:41	6:38-19:26	
65	Montclair-Chino Hills	4:36-22:34	6:40-19:30	6:40-19:30	
66	Fontana-Foothill-Montclair	4:19-23:12	5:46-22:15	5:51-19:29	
67	Montclair-Baseline-Fontana	5:37-20:22	n/a	n/a	
68	Chino-Montclair-Chaffey College	4:40-23:01	6:05-19:25	n/a	
80	Montclair-Ontario Conv Ctr-Chaffey College	4:33-21:24	6:30-19:40	6:30-19:40	
81	Ontario-Ontario Mills-Chaffey College	4:12-22:25	n/a	n/a	
82	Rancho Cucamonga-Fontana-Sierra Lakes	4:35-22:00	6:14-19:10	6:14-19:10	
83	Upland-Euclid-Chino	5:49-21:44	5:51-20:36	5:51-19:37	
365	OmniGo Chino Hills	4:59-22:09	6:02-18:55	6:02-17:55	

History of Recent Fixed Route Changes

Since the 2012 Title VI update, and in light of the economic challenges the agency has been facing, which has reduced its funding, Omnitrans' fixed route service has seen four adjustments; included with these adjustments has been a long delayed fare increase. Over the same period, from July of 2012 to May of 2015, ridership has understandably decreased, since fare increases typically yield reductions in ridership which only elastically recover after a period of time. As well, the delay of opening of the San Bernardino Transit Center (SBTC) until September of 2015 has impacted ridership on the new sbX route, as currently there is not direct transfer between that route and any other fixed routes at the interim 4th Street Transfer Center

that does not involve a substantial pedestrian walk; the opening of SBTC in September of 2015 should spur increases in ridership on both sbX and over the system overall. As a result, FY 2013 ridership was at 15.16 million; in FY 2014, it was 14.59 million; and for FY 2015, Omnitrans is projected to serve more than 13 million riders.

The four changes Omnitrans has undergone during this period are shown again in the table immediately following. For each of these fare or major service changes, Omnitrans completed an equity analysis which was reviewed and approved by its Board prior to the changes going into effect. A fifth major service change is scheduled for September of 2015; it will involve a major realignment of West Valley Routes and adjustments of East Valley routes to serve the new SBTC which will open at that time. A service equity analysis for this proposed service change has already been completed, and is included, even though the changes will not go into effect during this period for the triennial Title VI report.

Exhibit 37: Major Changes from July 2012 to September 2015

MAJOR CHANGE	DATE IMPLEMENTED	Equity Analysis Completed
1. Fare Changes	September 2, 2013	Yes
2. Service Change (sbX begins)	April 28, 2014	Yes
3. OmniConnects' Fare Change; East Valley Service Changes	September 2, 2014	Yes
4. Veterans' Fare Discount	January 5, 2015	Yes
5. West Valley Service Changes; Route 290 introduced; SBTC opens. (PROPOSED)	September 7, 2015 (PROPOSED)	Yes

The changes are more fully elaborated, following:

September 2013 Fare Change: Three Fare Policy changes went into effect. The first involved expanding the Go Smart program for partner school students to expand the program to other potential agencies; the second change did away with the Student Pass program and replaced it with a more inclusive Youth Pass Program; and the third change reduced Access Subscription fares to be equal to that amount paid for Access cash fares.

April 2014 Beginning of sbX Green Line Service: On April 28, 2014, Omnitrans introduced a Bus Rapid Transit Line along the E Street Corridor in San Bernardino. Known as the sbX Green Line, the service employs 60-foot-long articulated coaches which are designed to optimize operating speed and travel time while minimizing travel delay; it operates along the highest priority corridor in the Long Range Transit Plan, and serves a very dense population from California State University at San Bernardino through downtown San Bernardino to Hospitality Lane to Loma Linda University and the VA Hospital in Loma Linda. This parallels the course of Route 2, which is the underlying local route; as such, both routes 2 and 7 had their service modified in order to fit better with the new sbX Green Line.

September 2014 Fare and Service Change: In order to address a budgetary shortfall, Omnitrans scheduled an increase in fares which went into effect in September of 2014 as part of OmniConnects, its latest Short Range Transit Plan (SRTP). This fare increase was across the board over all fare types; in order to assure that no minority group was disparately effected or disparately impacted by this fare change, a fare equity analysis was completed which determined that the only group that would be impacted disproportionately would be minority students; for them, options such as the use of cost-saving weekly and monthly passes or the use of the GoSmart program for students of participating schools would mitigate the impact of fare increases such that they would no longer be unfairly impacted by the fare increase, and Omnitrans would remain in compliance with its Title VI obligations.

As well, a number of routes in the East Valley underwent modification or realignment in order to streamline them or have them better connect to the sbX Green Line. Route 19 was reorganized so as to integrate elements of Route 9 and lengthened so as to provide single-trip service from Yucaipa to Fontana, while now redundant route 9 was eliminated. OmniLink service in Yucaipa and Chino Hills, made redundant by the OmniGo Routes 308, 309, 310, and 365, was eliminated. Major West Valley changes were proposed and underwent a service equity analysis at this time, although most of the West Valley route changes will not go into effect until September of 2015.

January 2015 Introduction of Veterans Fare and Passes: In January of 2015, in appreciation of those who have served in our nation's armed forces, Omnitrans initiated a new discounted fare and bus passes for our veterans. As this was technically a change in our fare policy, a fare equity analysis was performed.

Proposed Service Change in September of 2015. Omnitrans proposes to introduce major service changes in September of 2015. These will include: 1) opening of the long-awaited San Bernardino Transit Center (SBTC) to replace the interim 4th Street Transfer Center; 2) realignment of most of the routes in our West Valley in order to streamline them and introduce more direct north-south service along major corridors to better feed into our established high-volume east-west routes; 3) modifications of portions many of our East Valley routes so that they move from the interim 4th Street Transfer Center to the new SBTC; and 4) introduction of a new limited-stop, peak-service freeway express route (Route 290) along the 10 Freeway from SBTC to the Montclair Transit Center. This proposed service change does not fall within the time frame of this triennial Title VI report, but the service equity analysis for it has already been performed (as part of the September 2014 Service and Equity analysis), and will be included here.

The respective service and fare equity analyses are to be found in their entirety and under separate cover in Appendix H.

Overall Triennial Service Equity Analysis

An overall service equity analysis was also performed for all the changes taken over the entire service area *in toto* as part of the triennial report. This analysis incorporates all the service changes which were proposed and later adopted and put into effect from 2012 to 2015 (excluding the September 2015 route changes, which are still proposed, and have not yet gone into effect).

Assessment of Environmental Justice

San Bernardino County has a large minority population which is widely dispersed throughout Omnitrans' service area. Although minority populations are distributed throughout the region, they are generally higher and denser in distribution in the East Valley than the West Valley. There are exceptions to this general rule, however: in the East Valley regions of Redlands, Yucaipa and Highland, there is generally a lower proportion of minority residents, although within Yucaipa there are significant pockets of low income white residents. As a recipient of federal funding, Omnitrans is obligated to ensure all minority and low income populations are equitably served and that no one is denied the benefit of transit service on the basis of race, color, national origin or economic status. To evaluate the current situation, the 2010 Census data and demographic data acquired from the American Community Survey (ACS) was analyzed using GIS techniques.

In order to assess whether Omnitrans meets Title VI of the federal regulations, a spatial analysis was conducted comparing populations of lower income groups and minorities (LIM) with the presence of transit services and facilities. These population maps were then evaluated against four sets of route maps based on service coverage and frequency to determine if the LIM populations received better or worse service than non-LIM populations, and how they stacked up against the general demographic description of the entire surrounding region, i.e., the cities within southwestern San Bernardino County, and San Bernardino County as a whole. Sets of service maps were marked by fixed-route buffers in each case; these were based on a one-half mile walking distance to a bus route, which represents the current Omnitrans standard. Appendix-C illustrates total and percentage minority and LIM populations by census block as determined by buffering of fixed routes, while Appendix-D shows the same data determined by buffering of fixed route bus stops. Both tables show minority populations determined at the census block level, and Low Income White populations determined at the census block group or tract level. As well, Exhibit 22 illustrates the one-half mile pedestrian buffer used to determine Title VI compliance in the spatial analyses.

GIS analysis was used to map the service area and all fixed routes. Various buffers were constructed about different assemblages of merged routes. The buffers were for three-quarters of a mile (ADA / Access Service Area distance determination) and for one-half mile distances. These buffers were determined for Tier levels: first, for all routes; then for 10-, 15-, and 30-minute service routes; for 10- and 15-minute service routes; and finally for 10-minute frequency routes (our Bus Rapid Transit (BRT) route, or the sbX Green Line).

In terms of bus stop and amenity distribution, an analysis was conducted to determine if Omnitrans was meeting its Title VI obligations by ensuring that the distribution of stops did not discriminate against LIM populations. Half-mile pedestrian buffers were generated for merged fixed route stops, specifically for all route stops, for all route stops with benches, and for all route stops with shelters. By use of spatial selection of census blocks (to determine numbers and proportions of minority residents) and census block groups (to determine numbers and proportions of low income white residents), numbers of minority residents and low income white residents were determined for each buffer region; when combined, these yielded the low-income/minority, or LIM, populations for each measure. These were compared to the same numbers and proportions found for that in the county overall and within the service area defined by all fifteen JPA cities' boundaries. The results were tabulated and follow in.

Exhibit 38: Low-Income / Minority Determination by Route Buffering Method

COMPARISON TO ROUTES	TOTAL POP	Minority	% Minority	Low-Income White (Adjusted)	LIM	% LIM
Population of County (2010 Census)	2,035,210	1,357,612	66.7%	67,850	1,425,462	70.0%
Population of Service Area (Includes Area within ALL JPA Cities' Limits)	1,329,086	959,240	72.2%	48,767	1,008,007	75.8%
Population of ADA/Access Service Area	1,384,804	1,031,112	74.5%	47,490	1,078,602	77.9%
3/4-Mile of Any Fixed Route (May, 2015)						
Within	1,349,581	1,007,624	74.7%	46,181	1,053,805	78.1%
Not-Within	685,629	349,988	51.0%	21,669	371,657	54.2%
County Total	2,035,210	1,357,612	66.7%	67,850	1,425,462	70.0%
1/2-Mile of Any Service						
Within	1,260,653	951,182	75.5%	42,516	993,698	78.8%
Not Within	774,557	406,430	52.5%	25,334	439,100	56.7%
1/2-Mile of 10-, 15-, 30-Minute Service						
Within	783,819	601,962	76.8%	27,981	629,943	80.4%
Not-Within	1,251,391	755,650	60.4%	39,869	795,519	63.6%
1/2-Mile of 10-, 15-Minute Service						
Within	432,529	353,142	81.6%	15,506	368,648	85.2%
Not-Within	1,602,681	1,004,470	62.7%	52,344	1,046,852	65.3%
1/2-Mile of 10-Minute Service (sbX)						
Within	47,580	36,264	76.2%	2,317	38,581	81.1%
Not-Within	1,987,630	1,321,348	66.5%	65,533	1,381,811	69.5%

Exhibit 39: Low-Income / Minority Determination by Buffering of Route Stops Method

COMPARISON TO STOPS	TOTAL POP	Minority	Whites	% Minority	Low-Income White (Adjusted)	LIM	% LIM
Population of County (2010 Census)	2,035,210	1,357,612	677,598	66.7%	67,850	1,425,462	70.0%
Population of Service Area (Includes Area within ALL JPA Cities' Limits)	1,329,086	959,240	369,846	72.2%	48,767	1,008,007	75.8%
Population of ADA/Access Service Area	1,384,804	1,031,112	353,692	74.5%	47,490	1,078,602	77.9%
3/4-Mile of Any Stop (May, 2015)							
Within	1,343,290	1,003,529	339,761	74.7%	45,885	1,049,414	78.1%
Not-Within	691,920	354,083	337,837	51.2%	21,669	375,752	54.3%
County Total	2,035,210	1,357,612	677,598	66.7%	67,850	1,425,462	70.0%
1/2-Mile of Any Stop							
Within	1,251,472	945,370	306,102	75.5%	42,243	987,613	78.9%
Not Within	783,738	412,242	371,496	52.6%	25,607	444,992	56.8%
1/2-Mile of Stops with Benches							
Within	978,837	754,084	224,753	77.0%	32,363	786,447	80.3%
Not-Within	1,056,373	603,528	452,845	57.1%	35,487	639,015	60.5%
1/2-Mile of Stops with Shelters							
Within	686,694	546,363	140,331	79.6%	21,072	567,435	82.6%
Not-Within	1,348,516	811,249	537,267	60.2%	46,778	846,362	62.8%

Results and Conclusions

In both cases, the numbers and proportion of Low-Income / Minority and Minority residents found within the established buffer regions around routes and around stops clearly exceeds that found in San Bernardino County as a whole, in the larger Service Area defined by the JPA city boundaries, and within the ADA / Access Service Area boundary.

For all service, 75.5% of the resident population is minority (versus 66.7% for the county overall) and 78.8% is LIM (versus 70.0% for the county overall). For the buffer associated with all 10-minute to 30-minute frequency service, the proportions of minority and LIM residents rises to 76.8% and 80.4%, respectively, and for 10- and 15-minute service the respective proportions of minority and LIM residents rises again to 81.6% and 85.2%.

As for stop placement, within a region defined by the sum of all half-mile distance buffers about any/all stops, Omnitrans serves a population which includes 78.0 percent Low Income/Minority; this is greater than that to be found in the surrounding regions of the JPA cities (75.1%) or the county, which includes a 70.0 percent LIM population. This is also to be expected given Omnitrans service standards regarding stop placement: these standards are distance-dependent primarily, and thus placement does not regard demographic makeup of the surrounding population. For stops with benches, Omnitrans serves regions with 77.0% minority and 80.3% LIM populations, respectively, and for stops that include shelters, Omnitrans serves areas with minority resident proportions of 79.6% and LIM proportions of 82.6%, respectively.

In general, as frequency of route service increases, from less to more frequent, and as amenities increase for stops, respectively, the proportions of Minority and LIM residents also increase. In short, the highest proportions of LIM residents are to be found within buffer regions of the higher amenity stops, and associated with the higher-frequency routes. The sole exception to this increasing trend is for the 10-minute sbX service; in this case, the proportions are 76.2% and 81.1%, respectively—which still exceeds substantially the same proportions for the county. Omnitrans remains compliant system-wide in its Title VI obligations.

Information Dissemination

Passengers are notified of changes or adjustments in service, whether temporary or permanent. Temporary route adjustments are disseminated to passengers through Rider Alerts. These are printed in both English and Spanish, and are placed on the affected routes within 24 hours of notification of the change. Rider alert and detour information also is posted on www.omnitrans.org, social media (Facebook, Twitter), and on the free Omnitrans mobile app, which is available via iTunes and Google Play.

Permanent changes to service are handled with Rider Alerts, Omnitrans' Connections (a newsletter printed in both English and Spanish, distributed onboard buses and mailed to surrounding residents of East Valley and West Valley facilities), Outlook (the Board and Stakeholder newsletter, emailed), Omnitrans' e-newsletter OmnInterchange (a general public newsletter, emailed to a subscriber base, with links posted on Facebook and Twitter), and public hearings that are held for proposed changes. Notices of change are also posted on

Omnitrans' website, and a summary of each and every service change is included on the first page of every edition of the Bus Book with a Spanish translation.

Notices regarding the hearings are put in the local newspapers and interested parties are encouraged to attend one of the specified meetings or to submit comments in writing or over the phone if they are not able to attend. Information is also disseminated through multidisciplinary meetings which Omnitrans' staff attends.

Omnitrans maintains an active presence online in the form of its website, www.omnitrans.org. This site provides continually updated information regarding route maps and scheduling, purchasing of passes, and even trip planning. It also employs Google Translate to translate the page into 53 languages of the user's choice; recently, it was upgraded so that Spanish instructions for use of the translation program were included on the home page itself. The website now offers a web-based LEP section as well, where visitors can access information in one of seven other LEP-identified languages, as illustrated (in red outline) in Exhibit 40.

Exhibit 40: Information in LEP-Identified Languages on Omnitrans.org



Omnitrans actively engages with its online audience on several social media platforms including Facebook and Twitter. The agency uses these sites to provide customer service, to answer questions, to run promotions and to share information and news updates. Omnitrans also maintains a blog that features popular personalized stories about passengers and how they use the bus service. These articles feature a cross-section of our rider population including students, the elderly and those with disabilities.

Omnitrans remains committed to informing the public of any changes in service that are made and to answering any questions that arise regarding the Agency's service. Omnitrans has the capability of producing public notices if an individual requires information in a special format. As well, notices can be put on a cassette tape and mailed to an individual if a request is made.

The Omnitrans Board of Directors meet monthly to discuss Agency business and to make decisions regarding service. A public comment section is conducted at each meeting to allow individuals to address the Board. Spanish translation service is available at all Board meetings if someone of limited English capability would like to comment. The Public and Specialized Transportation Advisory Coordination Council (PASTACC) also holds meetings on transportation service in the County, and the public is invited to comment on service (see Minorities on

Decision-making Bodies). In addition to Board Meetings and PASTACC meetings, Omnitrans staff regularly attends multi-disciplinary meetings (mostly representative of social service agencies) to inform groups of upcoming service changes and related public hearings.

Minorities on Decision-making Bodies

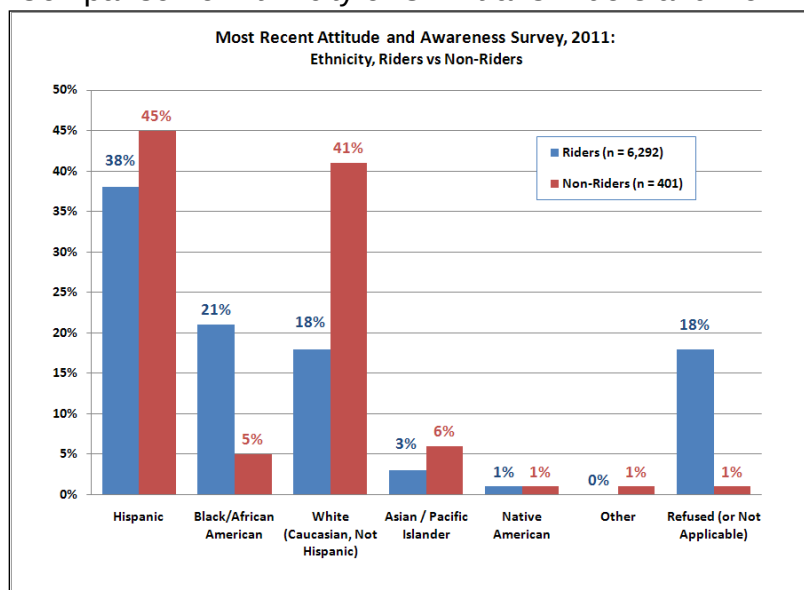
The majority of decision-making bodies are composed of elected officials appointed according to their jurisdiction. The make-up of these bodies is primarily Caucasian. Approximately 25% of Omnitrans' Board of Directors are minorities and approximately 30% of Omnitrans' Board of Directors are women.

One non-elected board that assists Omnitrans in decision-making is PASTACC. This is a state-mandated, 35-member technical advisory committee which provides oversight and guidance on policy, funding and grant opportunities related to public transit to both the transit and human services providers in the County. PASTACC is composed of approximately 25% minority members. Approximately 300 social service agencies receive notice of meetings, and all are welcome to attend, as are individuals from the public. To become a member of PASTACC, an individual or agency must petition for membership. While most petitioners are invited to join, PASTACC works to balance representation on its council. Currently 60 agencies/individuals are members of PASTACC.

Survey Information of Customer Demographics

The more recent Attitude and Awareness Survey done for Omnitrans in 2011 by the Redhill Group asked somewhat different questions than did the previous two surveys, and was designed to compare responses of Omnitrans riders to Omnitrans non-riders. According to this survey, as shown in Exhibit 41, distinct differences are apparent between Riders and Non-Riders.

Exhibit 41: Comparison of Ethnicity of Omnitrans Riders and Non-Riders, 2011



According to these results, a far higher proportion of Omnitrans' ridership is derived from the minority community than is seen amongst the population of non-riders in the county. It must be remembered that Hispanic as an ethnicity can include other races as well, and so many who self-identify as Hispanic may also be white, and vice-versa. As well, it is noteworthy that such a high proportion of ridership (18% of 6,292 surveyed) either refused to identify ethnicity, identified as multi-racial, or indicated as "non-applicable". These results accord well with more recent demographic data of the county of San Bernardino overall, taken from the 2010 Census.

Multilingual Facilities

The Hispanic population makes up the greatest percent of the minority population in the Omnitrans service area (49%). Therefore, Omnitrans continues to strive to improve communication for the Spanish speaking community. Bus books are printed in both English and Spanish, as are all Rider Alerts. Omnitrans' Information Clerks are required to be bilingual and are able to answer questions about service in either English or Spanish. Interpreters are available at public hearings for individuals who are not able to understand English or who require special accommodations. Advertisements for Omnitrans are printed in both English and Spanish newspapers and announcements are made on local radio stations that serve both English and Spanish markets.

Omnitrans has print material in other languages besides English and Spanish; according to the Four Factor Analysis of our Limited English Proficiency (LEP) Policy and Language Assistance Plan, certain documents vital to the public's interaction with the agency are translated into seven other languages other than English. These documents include such items as:

- Title VI protection notification and notice of Title VI obligations,
- Instructional rider material in the form of a "How to Ride" brochure,
- All Public Meeting Announcements posted on the agency's website, and
- General notices stating that language translation assistance is available for LEP languages

The LEP Policy and Language Assistance Plan is provided under separate cover in Appendix J for more details.

Omnitrans also has employees who speak Mandarin, Tagalog, and Vietnamese, in addition to those who speak Spanish, and their respective linguistic skills are frequently employed at public hearings and elsewhere. In all cases of surveys, communications, and public outreach, Omnitrans ensures that Spanish speakers are present and employed for verbal communication and explication—in order not only to meet the needs of LEP speakers, but as well in order to disseminate information orally so as to meet the needs of those who have limited proficiency with the written word. Finally, Omnitrans' website, www.omnitrans.org, continues to use Google translate, which permits those who visit the site to translate the page into any one of 53 languages, and now offers a web-based LEP section as well, as shown in Exhibit 40.

The latest Public Outreach Plan, which was commissioned through IBI Group and Arellano Associates for the 2008-2013 Short Range Transit Plan, delineates any concerns regarding public outreach succinctly. Whenever Omnitrans makes any significant change to service, this needs to be communicated to the public in the form of public outreach. The manner in which communication is made takes numerous forms, and includes: Major Investment Studies and Environmental Impact Reports and Studies; notification of the public of route and service changes by Rider Alerts; the Short Range Transit Plan; various public surveys, market research, and focus groups; one-on-one interviews and survey intercepts; scoping meetings and open houses; community meetings and public hearings; etc.

An effective public outreach program was described in detail which facilitates maximum effective and meaningful access to all interested people, including those of limited English proficiency. Since meaningful access must extend as well to persons who cannot read and understand what is read, there is a need to include outreach to low-literate populations, too; by employing the spoken word as well as the written, and by transcribing comments and conducting oral interviews, Omnitrans is able to obtain views and comments from all participants at public outreach events. Omnitrans fulfills all the requirements of our Public Outreach Plan with respect to meeting the needs of LEP ridership.

Recent Enhancements for Multilingual / LEP Community

Omnitrans has added a number of enhancements to its multilingual services as part of our agency's continuing efforts to reach out to the limited English proficiency (LEP) community.

Omnitrans has incorporated real time bus arrival prediction information software, also called the "next bus" information systems, and branded as "NexTrip". Bus stops provide signage at eye-level with Quick Response (QR) code, bar code, or text-4-next information to access real time arrival information. Signs also show the website and 1-800 numbers directing riders to customer service. These are in English and Spanish and installed at all bus stops. At the same time, the bus stop identification signs are character-, graphics- and symbol-rich, with universal graphics, the bus route number, and minimal English. This form of communication is more universal and less dependent upon proficiency in the English language.

However, these are only a portion of the overall multilingual effort, as this effort has expanded significantly over the most recent triennial period. As of last year, Omnitrans has approved and instituted a comprehensive LEP Policy and Language Assistance Plan, which now acts as the foundation for our Limited English Proficiency outreach and effort.

As per both Section 601 of Title VI of the Civil Rights Act of 1964, the more recent FTA Circular 4702.1B, and the LEP Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency (65 FR 50121, Aug. 11, 2000)", Omnitrans has developed and implemented both an LEP Plan and a Language Assistance Plan (LAP) by which Limited English Proficiency (LEP) persons and beneficiaries can gain meaningful access to translations of written and oral information of Omnitrans' services.

As part of a comprehensive LEP Policy and Language Assistance Plan, Omnitrans was required to perform what is known as a Four Factor Analysis of numbers and proportions of LEP riders. This was done, and included the following four determination:

1. Factor 1: Determine the number and/or proportion of LEPs likely to be encountered by the program.
2. Factor 2: Determine the frequency of program contact with these LEPs (also known as the probability of interaction).
3. Factor 3: Determine the nature and importance of the agency's program to LEP members of the public.
4. Factor 4: Determine the resources available and costs to the program needed to implement a Language Assistance Plan.

The Four Factor Analysis identified seven other LEP languages in Omnitrans' service area: Spanish, Chinese (Mandarin), Korean, Vietnamese, Tagalog, Arabic, and Cambodian (Khmer or Hmong).

Spatial distribution of the important concentrations of LEP membership for these respective languages was also mapped by use of GIS in order for the agency to more effectively direct appropriate language services to its ridership.

The FTA Circular 4702.1B Safe Harbor provisions require that vital documents be translated into the primary language for each LEP group that meets a demographic threshold. Currently, the threshold for each LEP group is the presence of LEP speakers for that language at the level of 5% of the total service area population or 1,000 individuals, whichever measure is less. Based on the Four Factor Analysis performed, Omnitrans identified both the vital documents necessary for riders to access services, and the language needs and services required to provide meaningful access to information for the LEP residents of our service area. A list of identified agency vital documents includes:

1. Instructional / Informational rider material in the form of a *"How to Ride"* brochure
2. Title VI protection notifications and Notice of Title VI obligations.
3. All public hearing notices (Public Meeting Announcements posted on agency's website).
4. General notices stating that language translation assistance is available for LEP languages.
5. Notice of availability of Telephone Interpretation Services.
6. Decal or Driver panel bus card giving same information (language translation assistance is available for LEP languages).

Less critical documents are translated and made available in Spanish primarily (bilingual translation), owing to the much higher probability of interaction with the Spanish-speaking LEP population:

1. Temporary, High-Importance bus stop information/signs (for major, long-term detours and high-importance Rider Alerts).
2. All onboard and customer / rider surveys.
3. Bus book.

Although Spanish has been identified as the most common LEP language, translation assistance in all seven languages is made available for LEP persons. Omnitrans' customer information center (including front desk receptionists and customer service representatives) not only continues to provide bilingual services (Spanish), but now also employs a real-time translation service (Avaza Language Services Corp) to assist in translating the other LEP customer languages upon request. A number of further language assistance measures and public outreach methods have been identified and put into effect; these are elaborated upon in the full LEP Policy and Language Assistance Plan, which is included in its entirety as Appendix J.

Record of Title VI Complaint Procedure, and of Title VI Complaints

As part of the procedure for recognizing and responding to public complaints regarding Title VI, Omnitrans has put into place a protocol for identifying and compiling Title VI complaints. This protocol is an addition to the procedures in place for using Trapeze COM, which is the agency's complaint registration and compilation program. Salient excerpts from Omnitrans protocol for Complaint Procedures for Trapeze COM, Title VI Additions follow:

Title VI Complaints.

If a complaint could be construed as a potential Title VI violation, the Customer Service Representative will notify the Customer Service Manager. The Customer Service Manager will forward such complaints via Trapeze COM to the Transit Planner for Title VI review and documentation. The Transit Planner will document the findings related to the validity of the complaint as it relates to Title VI complaints in Trapeze COM. (See Appendix-B, DOT Title VI Assurance and continued FTA Title VI Discrimination Complaint Procedures)

Identifying Title VI-related Complaints

According to Title VI of the Civil Rights Act of 1964, Omnitrans cannot discriminate against individuals based on race, color, or national origin, and must identify, flag, and act on complaints which are of this nature. "Discrimination complaints" typically fall into two broad categories: 1) Immediate Service level, or 2) Broad Planning or Policy level. These two categories broadly but aptly correspond to the two forms of discriminations prohibited by Title VI, namely: disparate treatment (intentional discrimination), and disparate impact (unintentional treatment), respectively.

A. Immediate Service Level Complaint (Disparate Treatment)

An Immediate Service Level complaint asserts that an individual has experienced immediate, direct, and personal discrimination by some element of the agency based on race, color, or national origin. These complaints are individual in nature, and not indicative of an agency-wide policy. Hypothetical examples of these sorts of comments would be as follows:

1. An Omnitrans coach operator refuses to pick me up because of my race (one time incident).
2. An Omnitrans coach operator threw me off the bus or has it in for me because of my race (one time incident).
3. Omnitrans coach operators refuse to pick people up from this stop because the customers are of this race.
4. Some Omnitrans Coach Operators have made derogatory comments of a racial, ethnic, lack of English language proficiency (nature), etc.

Immediate Service Level complaints are adequately addressed by current measures and should continue to be categorized based on current practice. Such complaints are always taken seriously, and are always followed up by an interview with the complainant and an interview with the accused individual. In those cases where it is appropriate, videos of the incident (as taken by onboard coach video cameras) are reviewed carefully. In those cases in which the accused is found to be at fault, corrective action is taken, and the case is closed. In those cases in which the accusation is found to have no merit, the case is closed. The results of all cases are recorded in Trapeze COM.

It is important to note here that in all cases such as these, the incident is investigated, and if it is seen to be a valid complaint, the coach operator is contacted and counseled. If necessary, further action is taken. If Omnitrans failed to do this, and allowed the problem to become widespread amongst many operators, or permitted one or more operators to continue such infractions without corrective response, the agency would be guilty of disparate treatment, and this would constitute a true Title VI violation.

B. Broad Planning/Policy Level Complaint (Disparate Impact)

A Broad Planning or Policy Level complaint reports discrimination that impacts more than one individual or over more than one incident (in which a pattern is demonstrated). It compares a particular situation to others and asserts that the problem is characteristic of agency-wide policies.

An important common component of these complaints is either a direct or an implied comparison of one group of people or one community to another. It relates (explicitly or implicitly) what the agency is doing for them versus what it is doing for other communities. This type of complaint will include coach incidents, public outreach incidents, planning or policy issues, or publications the agency disseminates. Hypothetical examples of these sorts of comments would be:

1. Omnitrans coach operator(s) are repeatedly abusive (or racist) to riders along this route or this series of stops (a pattern is demonstrated).
2. Omnitrans never has materials printed in my language.
3. The rich communities are getting more service, but services in the poorer communities are being cut.
4. Omnitrans has raised the fares and this disproportionately affects poor people or people of a certain ethnic group.

Comments of this nature will be flagged as potential Title VI complaints and forwarded to the Transit Planner.

Sub-Recipient Monitoring of Title VI Compliance

Omnitrans is a direct recipient of federal transit funding; as such, this makes the agency a primary recipient of funding. It provides pass-through funding to a number of other smaller agencies or entities which are sub-recipients. Omnitrans is responsible for ensuring that its sub-recipients likewise fulfill their Title VI obligations. In accordance with 49 CFR 21.9(b), and to ensure that sub-recipients are complying with the DOT Title VI regulations, primary recipients such as Omnitrans must monitor their sub-recipients for compliance.

As part of its sub-recipient monitoring program, Omnitrans employees an annual self-certification form combined with an annual inspection of the sub-recipient. Appendix K contains the body of the sub-recipient annual FTA compliance self-certification form.

Exhibit 41, following, gives the record and schedule of sub-recipient inspections for the last year.

Exhibit 42: Sub-Recipient Title VI Program Compliance

Sub-recipient	Responsible Staff	Current Title VI Program?	Date Title VI Program Collected
City of Needles	Development Planning Manager	Yes	4/24/2015
Yucaipa Transit Center Phase II	Senior Financial Analyst	Yes	7/15/2015
SANBAG - San Bernardino Intermodal Transit Center	Development Planning Manager	No	7/31/2015 (expected)
Valley Transportation Services	Senior Financial Analyst	Yes	6/16/2015
Pomona Valley Workshop	Senior Financial Analyst	Yes	6/30/2015
Central City Lutheran Mission	Senior Financial Analyst	Yes	7/1/2015
Community Senior Services	Senior Financial Analyst	Yes	6/15/2015
LLUMC Adult Day Health Services	Senior Financial Analyst	No	7/31/2015 (expected)
United Way	Senior Financial Analyst	Yes	6/15/2015
City of Fontana - Transit Stop Access Improvements	Development Planning Manager	Yes	4/29/2015
City of Highland - Transit Stop Access Improvements	Development Planning Manager	No	7/31/2015 (expected)
OPARC	Senior Financial Analyst	Yes	6/15/2015
Victor Valley Transit (VVTa)	Senior Financial Analyst	No	7/31/2015 (expected)

Title VI Complaints Received and Actions Taken

Omnitrans utilizes Trapeze COM to track customer inquiries, complaints, and commendations. Within Trapeze COM, contacts are tracked by multiple categories, including one category which allows Omnitrans to track and evaluate potential Title VI complaints. In the last three years, Trapeze COM has flagged more than six-thousand customer feedbacks which were identified as

complaints of various types; the great majority of these are not potential Title VI complaints, but are of an entirely different nature (“My bus was late”, “The coach operator was mean to me”, etc.) and are easily filtered by the system in place.

After being filtered, a total of fifty-six contacts were flagged as being of *potential* Title VI interest (“discrimination” type complaints) from June 1, 2012 to April 27, 2015; this equated to less than one-percent of all customer contacts, and as per Omnitrans’ policy required further Title VI evaluation. These incidents were evaluated by Field Supervisors for validity of the complaint, typically through watching video of the reported incident. Of these, six were considered either valid or equivocal with respect to complaint of discrimination against a coach operator. Additionally, all potential Title VI complaints were reviewed by Omnitrans’ Transit Planner. None were found to relate to a broad level policy or to show a consistent pattern of discrimination by Omnitrans or Omnitrans’ employees. All valid and invalid complaints were determined to be of a service level, or disparate treatment nature, and each of these was resolved directly.

No incident was considered to be a Broad Level Title VI complaint of disparate impact or disparate treatment due to Omnitrans’ service, planning, or policy level decisions.

Omnitrans has few complaints of discrimination and no driver has received more than one such valid complaint. This may be attributable to Omnitrans’ proactive remediation protocols in place to correct not only perceived discriminatory behavior, but also negligent, intemperate, and rude behavior, and to generally improve customer service. When customer complaints are found to be valid, an individual is counseled, and a progressive series of corrective measures are in place to remedy the situation. Initially, these include counsel from supervisors, ride-alongs, and annual refresher training. Ultimately, repeat complaints can lead to progressive discipline and ultimately to termination for recalcitrant cases. See Appendix G for a record of these complaints over the last three years.

Title VI Statement and Complaint Procedure

As a result of Omnitrans’ Limited English Proficiency Policy and Language Assistance Plan, the Title VI Statement and Complaint Procedure is now prominently displayed in all Omnitrans’ coaches for riders to read, and is in seven determined Safe Harbor languages as well as English (the languages, as determined demographically by a Four Factor Analysis and LEP Safe Harbor provisions, are: Spanish, Mandarin (Chinese), Korean, Vietnamese, Tagalog, Khmer (Cambodian), and Arabic. The text of the statement, including all translations, is shown in Appendix I. An example of the placard as it appears presently on one of our coaches is illustrated in Appendix L.

APPENDIX-A FTA CIVIL RIGHTS ASSURANCE

OMNITRANS HEREBY CERTIFIES THAT, as a condition of receiving Federal financial assistance under the Federal Transit Act of 1992, 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 provided by Omnitrans.
2. Omnitrans will compile, maintain, and submit in a timely manner Title VI information required by FTA Circular 4702.1A and in compliance with the Department of Transportation's Title VI regulations, 49 CFR Part 21.9.
3. Omnitrans will make it known to the public that those 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 provided by Omnitrans may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

The person whose signature appears below is authorized to sign this assurance on behalf of the grant application or recipient.

_____	_____
P. Scott Graham, CEO/General Manager	Date

APPENDIX-B DOT TITLE VI ASSURANCE

OMNITRANS HEREBY AGREES THAT as a condition of receiving any Federal financial assistance from the Department of Transportation, it will comply with Title VI of the Civil Rights Act of 1964, 42 U.S.C. Sections 2000d—2000d-4 (hereinafter referred to as the Act) and all requirements imposed by or pursuant to 49 CFR Part 21 and other pertinent directives, to the end that in accordance with the Act, Regulations and other pertinent directives, no person shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which Omnitrans receives Federal financial assistance from the Department of Transportation, including the Federal Transit Administration and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21,7(a) of the Regulations.

More specifically and without limiting the above general assurance, Omnitrans hereby gives the following specific assurances with respect to its Federal Transit Administration projects:

1. Omnitrans agrees that each “program” and each “facility” as defined in subsections 21,23(e) and 21,23(b) of the Regulations, will be (with regard to a “program”) conducted, or will be (with regard to a “facility”) operated in compliance with all requirements imposed by, or pursuant to, the Regulations.
2. Omnitrans shall insert the following notification in all solicitations for bids for work or materials subject to the Regulations and made in connection with all Title VI Programs and, in adapted form in all proposals for negotiated agreements:

Omnitrans, in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4 and Title 49, Code of Federal Regulations, department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders that it will affirmatively insure that in any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color or national origin in consideration for an award.

3. Omnitrans shall insert the clauses of Appendix-A of this assurance in every contract subject to this Act and the Regulations. All appendices to this assurance are on file but are not included as part of this Title VI Compliance Report.
4. Omnitrans shall insert the clauses of Appendix-B of this assurance, as a covenant running with the land, in any deed from the United States affecting a transfer of real property, structures or improvements thereon or interest therein.
5. Where Omnitrans receives Federal financial assistance to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.

6. Where Omnitrans receives Federal financial assistance in the form of, or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over, or under such property.
7. That Omnitrans shall include the appropriate clauses set forth in Appendix-B of this assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses and similar agreements enter into by Omnitrans with other parties: (a) for the subsequent transfer of real property acquired or improved under subsequent transfer of real property acquired or improved under FTA projects; and (b) for the construction or use of or access to space on, over, or under real property acquired, or improved under FTA projects.
8. This assurance obligates Omnitrans for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property in interest therein or structures or improvements thereon, in which case the assurance obligates the Recipient or any transferees for the longer of the following periods: (a) the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which Omnitrans retains ownership or possession of the property.
9. Omnitrans shall provide for such methods of administration for the program as are found by the Secretary of Transportation of the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest and other participants of Federal financial assistance under such programs will comply with all requirements imposed or pursuant to the Act, the Regulations and this assurance.
10. Omnitrans agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations and this assurance.

THIS ASSURANCE is given in consideration of and for the purposes of obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to Omnitrans by the Department of Transportation under the operating, capital and planning programs and is binding on it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest and other participants in FTA projects. The person whose signature appears below is authorized to sign this assurance on behalf of Omnitrans.

P. Scott Graham, CEO/General Manager Date

APPENDIX-B, CONTINUED FTA TITLE VI DISCRIMINATION COMPLAINT PROCEDURES

1.0 Purpose

Any person who believes that he or she, individually, or as a member of any specific group of persons, has been subjected to discrimination by Omnitrans on the basis of race, color or national origin, may file a written complaint with the FTA or the Secretary of Transportation. He or she must do so within 180 days after the date of the alleged discrimination, unless the Secretary extends that date.

FTA recommends that any complaint be filed first with Omnitrans, filing with the FTA only if he or she emerges dissatisfied with the Omnitrans resolution. The Office of the Secretary would then make the final decision on the matter.

The following summarizes the complaint procedure.

2.0 Submission of Complaints

2.1 Complainants may submit written complaints to the FTA Director, Office of Civil Rights, the FTA Area Civil Rights Officer, and/or the Departmental Director of Civil Rights. Those unable to submit written reports may file a verbal complaint with these persons and will be interviewed in connection with the complaint.

2.2 Complaints must be signed by the complainant or his/her representative. They must state, as fully as possible, the facts and circumstances surrounding the alleged discrimination.

2.3 FTA will provide the complainant or his/her representative with a written acknowledgement of receiving the complaint within 10 working days.

3.0 Determining the Merit of Complaints

The Departmental Office of Civil Rights will determine within 15 working days of receiving the complaint, if DOT has jurisdiction to pursue resolution and whether the complaint has sufficient merit to warrant an investigation. A complaint will be regarded as having merit except under the following circumstances:

3.1 It clearly appears on its face to be frivolous or trivial;

3.2 Within the time allotted for determining the complaint's merit, Omnitrans voluntarily concedes noncompliance with Title VI and agrees to take appropriate remedial action;

3.3 Within the time allotted for determining the complaint's merit, the complaint is withdrawn;

3.4 Other good cause for not investigating the complaint exists, e.g., Omnitrans is under investigation by another federal agency.

4.0 Requests for Additional Information from Complainant or Omnitrans

The Departmental Office of Civil Rights may request additional information from a complainant or Omnitrans within 15 working days after receiving the complaint if it determines either party has not submitted sufficient information. The complainant's failure to do so may constitute good cause for a determination of no investigative merit. Omnitrans' failure to submit additional information may constitute good cause for a determination of noncompliance and subject to enforcement of Title VI requirements.

5.0 Notification of Disposition

The Departmental Director of Civil Rights shall notify within 5 working days by registered letter, the complainant and Omnitrans of its decision:

5.1 In the event of a decision not to investigate the complaint, the notification shall specifically state the reason for the decision.

5.2 In the event the complaint is to be investigated, the notification shall state the grounds of DOT jurisdiction, inform the parties that an investigation will take place, and request any additional information needed to assist the investigator in preparing for the investigation.

6.0 Referral to Other Agencies

When DOT lacks jurisdiction, the Departmental Director of Civil Rights shall refer the complaint to other State or Federal agencies, informing the parties of the action. For example, discrimination complaints regarding employment could be referred to the Equal Employment Opportunity Commission or to a state agency with comparable responsibility.

7.0 Complaint Investigation

7.1 The Departmental Office of Civil Rights may elect to conduct its own investigation of the complaint. The investigation may be conducted by "desk audit" or an "onsite" investigation. When DOT lacks jurisdiction, the Departmental Office of Civil Rights will refer the complaint to the responsible State or Federal agency, informing the complainant of this action.

7.2 Cases determined to have investigative merit may be sent back to FTA to conduct an "onsite" or may be recommended for a comprehensive Title VI review of the respondent.

7.3 A complaint shall be given priority status and its investigation accelerated if such discrimination would be irremediable if not dealt with promptly.

7.4 An investigator will send letters of introduction to the complainant and Omnitrans within 30 working days after receiving the case, establishing the times and dates for the “onsite” investigation and interviews.

7.5 The responsible investigator will prepare a written report at the conclusion of the investigation, which will be reviewed by the Departmental Office of Civil Rights for thoroughness. The report will include the following:

7.5.1 Summary of the complaint, including a statement of the issues raised by the complainant and Omnitrans’ response;

7.5.2 Citations of relevant Federal, State and local laws, rules, regulations and guidelines;

7.5.3 Description of the investigation, including a list of persons contacted and interviews conducted;

7.5.4 A statement of the investigator’s findings and recommendations.

8.0 Disposition of Complaints

8.1 The Departmental Office of Civil Rights will approve or disapprove the investigator’s findings and recommendations and notify the complainant and Omnitrans of its decision.

8.2 If the Notice of Disposition finds Omnitrans in noncompliance, Omnitrans must initiate voluntary remediable actions agreeable to the Departmental Office of Civil Rights.

8.3 If all required means of remedial action fail to bring Omnitrans in compliance, the Departmental Office of Civil Rights will initiate enforcement procedures in conjunction with FTA.

8.4 Omnitrans may request reconsideration of the Department’s findings within 30 working days of the Notice of Disposition. The Request should include any additional information or analysis Omnitrans considers relevant. The Departmental Office of Civil Rights will inform Omnitrans of its decision on the request within 30 days after its receipt. The responsible investigator will reopen the case if the request is approved.

APPENDIX-C LOW-INCOME / MINORITY (LIM) POPULATION SERVED: FIXED ROUTES

COMPARISON TO ROUTES	TOTAL POP	Minority	% Minority	Low-Income White (Adjusted)	LIM	% LIM
Population of County (2010 Census)	2,035,210	1,357,612	66.7%	67,850	1,425,462	70.0%
Population of Service Area (Includes Area within ALL JPA Cities' Limits)	1,329,086	959,240	72.2%	48,767	1,008,007	75.8%
Population of ADA/Access Service Area	1,384,804	1,031,112	74.5%	47,490	1,078,602	77.9%
3/4-Mile of Any Fixed Route (May, 2015)						
Within	1,349,581	1,007,624	74.7%	46,181	1,053,805	78.1%
Not-Within	685,629	349,988	51.0%	21,669	371,657	54.2%
County Total	2,035,210	1,357,612	66.7%	67,850	1,425,462	70.0%
1/2-Mile of Any Service						
Within	1,260,653	951,182	75.5%	42,516	993,698	78.8%
Not Within	774,557	406,430	52.5%	25,334	439,100	56.7%
1/2-Mile of 10-, 15-, 30-Minute Service						
Within	783,819	601,962	76.8%	27,981	629,943	80.4%
Not-Within	1,251,391	755,650	60.4%	39,869	795,519	63.6%
1/2-Mile of 10-, 15-Minute Service						
Within	432,529	353,142	81.6%	15,506	368,648	85.2%
Not-Within	1,602,681	1,004,470	62.7%	52,344	1,046,852	65.3%
1/2-Mile of 10-Minute Service (sbX)						
Within	47,580	36,264	76.2%	2,317	38,581	81.1%
Not-Within	1,987,630	1,321,348	66.5%	65,533	1,381,811	69.5%

* Defined as total population minus White Alone (not Hispanic or Latino). By default, all not white alone equal "minority".

All population estimates derived by GIS selection of block data, except for determination of Low Income Whites, which is at the block group or tract level.

APPENDIX-D LOW-INCOME / MINORITY (LIM) POPULATIONS SERVED: BUS STOPS

COMPARISON TO STOPS	TOTAL POP	Minority	Whites	% Minority	Low-Income White (Adjusted)	LIM	% LIM
Population of County (2010 Census)	2,035,210	1,357,612	677,598	66.7%	67,850	1,425,462	70.0%
Population of Service Area (Includes Area within ALL JPA Cities' Limits)	1,329,086	959,240	369,846	72.2%	48,767	1,008,007	75.8%
Population of ADA/Access Service Area	1,384,804	1,031,112	353,692	74.5%	47,490	1,078,602	77.9%
3/4-Mile of Any Stop (May, 2015)							
Within	1,343,290	1,003,529	339,761	74.7%	45,885	1,049,414	78.1%
Not-Within	691,920	354,083	337,837	51.2%	21,669	375,752	54.3%
County Total	2,035,210	1,357,612	677,598	66.7%	67,850	1,425,462	70.0%
1/2-Mile of Any Stop							
Within	1,251,472	945,370	306,102	75.5%	42,243	987,613	78.9%
Not Within	783,738	412,242	371,496	52.6%	25,607	444,992	56.8%
1/2-Mile of Stops with Benches							
Within	978,837	754,084	224,753	77.0%	32,363	786,447	80.3%
Not-Within	1,056,373	603,528	452,845	57.1%	35,487	639,015	60.5%
1/2-Mile of Stops with Shelters							
Within	686,694	546,363	140,331	79.6%	21,072	567,435	82.6%
Not-Within	1,348,516	811,249	537,267	60.2%	46,778	846,362	62.8%

* Defined as total population minus White Alone (not Hispanic or Latino). By default, all not white alone equal "minority".

All population estimates derived by GIS selection of block data, except for determination of Low Income Whites, which is at the block group or tract level.

APPENDIX-E SERVICE CHANGES FROM 2012 TO 2015

Monitor	Map	Weekday	Saturday	Sunday	Route	Date	Description
Yes	Major	Major	Major	Major	80	7-May-12	Ended interlining with Route 65. Interlined with Route 68.
		Medium			3	7-May-12	Weekday service frequency on routes 3 and 4 increased to 15 minutes during peak period between Noon and 3:00 PM.
		Medium			4	7-May-12	Weekday service frequency on routes 3 and 4 increased to 15 minutes during peak period between Noon and 3:00 PM.
			Minor		1	7-May-12	Saturday evening service extended on Routes 1, 2, 3, 4, and 5.
			Minor		2	7-May-12	Saturday evening service extended on Routes 1, 2, 3, 4, and 5.
			Minor		3	7-May-12	Saturday evening service extended on Routes 1, 2, 3, 4, and 5.
			Minor		4	7-May-12	Saturday evening service extended on Routes 1, 2, 3, 4, and 5.
			Minor		5	7-May-12	Saturday evening service extended on Routes 1, 2, 3, 4, and 5.
	Minor	Minor	Minor	Minor	365	7-May-12	Route 365 timepoint D at Chino Hills City Hall moved slightly to Grand Avenue and Civic Center Drive; schedules for all days adjusted accordingly.
	Minor	Minor	Minor	Minor	8	7-May-12	Route 8 timepoint at Del Rosa and 3rd Street adjusted, and schedule likewise adjusted to accommodate this change for all days.
					2	7-May-12	Minor time adjustments made for weekdays to routes 2, 66, 68, 80, and 308.
					66	7-May-12	Minor time adjustments made for weekdays to routes 2, 66, 68, 80, and 308.
					68	7-May-12	Minor time adjustments made for weekdays to routes 2, 66, 68, 80, and 308.
					80	7-May-12	Minor time adjustments made for weekdays to routes 2, 66, 68, 80, and 308.
					308	7-May-12	Minor time adjustments made for weekdays to routes 2, 66, 68, 80, and 308.
		Minor			365	4-Sep-12	Weekday tripper service added to OmniGo Route 365 in order to serve Townsend Jr. High School in Chino Hills.
					3	4-Sep-12	Minor schedule adjustments.
					4	4-Sep-12	Minor schedule adjustments.
					5	4-Sep-12	Minor schedule adjustments.
					7	4-Sep-12	Minor schedule adjustments.
					9	4-Sep-12	Minor schedule adjustments.
					10	4-Sep-12	Minor schedule adjustments.
					11	4-Sep-12	Minor schedule adjustments.
						4-Sep-12	Minor schedule adjustments.
					14	4-Sep-12	Minor schedule adjustments.
					19	4-Sep-12	Minor schedule adjustments.
					66	4-Sep-12	Minor schedule adjustments.
					67	4-Sep-12	Minor schedule adjustments.
					81	4-Sep-12	Minor schedule adjustments.
					82	4-Sep-12	Minor schedule adjustments.
					83	4-Sep-12	Minor schedule adjustments.
					21	4-Sep-12	Minor schedule adjustments.

Monitor	Map	Weekday	Saturday	Sunday	Route	Date	Description
					215	4-Sep-12	Minor schedule adjustments.
					365	4-Sep-12	Minor schedule adjustments.
					66	7-Jan-13	Minor changes made to Route 66 weekday schedule, with the 5:24 westbound AM trip at Foothill and Grove adjusted in order to facilitate transfers to the Foothill Silver Streak.
					82	7-Jan-13	Minor changes made to Route 82 weekday and weekend schedules (to all days).
					365	7-Jan-13	Adjustments made to schedule of OmniGo Route 365 morning trips leaving Chino Transit Center.
				Minor	1	6-May-13	Minor changes made to the Sunday service schedule.
		Minor			3	6-May-13	Minor changes to weekday schedules.
		Minor			4	6-May-13	Minor changes to weekday schedules.
		Minor			9	6-May-13	Minor changes to weekday schedules.
		Minor			15	6-May-13	Minor changes to weekday schedules.
		Minor			61	6-May-13	Minor changes to weekday schedules.
		Minor			325	6-May-13	Minor changes to weekday schedules.
	Minor	Minor	Minor	Minor	5	6-May-13	Time point C Southbound trips will stop at 40th Street & Sierra Way; Northbound trips will stop at 40th Street & Sierra Way; Times will be adjusted on all days.
	Minor				7	3-Sep-13	The Time Point at Sierra Way & 40th is changed to Sierra Way & Ralston, southbound only.
		Minor			10	3-Sep-13	Minor changes to weekday schedules.
		Minor			11	3-Sep-13	Minor changes to weekday schedules.
		Minor			14	3-Sep-13	Minor changes to weekday schedules.
		Minor			15	3-Sep-13	Minor changes to weekday schedules.
		Minor			66	3-Sep-13	Minor changes to weekday schedules.
		Minor			83	3-Sep-13	Minor changes to weekday schedules.
		Minor	Minor		61	3-Sep-13	Minor changes to weekday and Saturday schedules.
		Minor			14	6-Jan-14	Minor changes to weekday schedules.
		Minor			20	6-Jan-14	Minor changes to weekday schedules.
		Minor			67	6-Jan-14	Minor changes to weekday schedules.
		Minor			82	6-Jan-14	Minor changes to weekday schedules.
	Major	Major	Major		2	28-Apr-14	Route 2 extended past Cal State San Bernardino north-westerly along Kendall Drive to the Kendall and Palm stop to parallel sbX service along the same corridor.
		Medium			2	28-Apr-14	Route 2 weekday frequency reduced from 15-minute service to 30-minute service. Saturday and Sunday Service remains at 30-minute frequency.
	Major	Major	Major		7	28-Apr-14	Route 7 service ends at Cal State San Bernardino campus instead of Palm and Kendall and the Pine-Ohio-Palm-Kendall loop. Service eliminated for Pine-Ohio-Palm-Kendall loop due to insupportably low ridership.
	New	New			202	28-Apr-14	Route 202 (sbX, Green Line) begins along E Street Corridor. Service will be 15-minute weekday, with peak service frequency of 10 minutes. Service will run from 6:00 AM to 9:00 PM on weekdays only and will extend from the Park and Ride at Palm and Kendall along Kendall to Cal State San Bernardino campus, then along Kendall to Little Mountain and Shandin Hills, to E Street south to

Monitor	Map	Weekday	Saturday	Sunday	Route	Date	Description
							Marshall, Highland, Baseline, the San Bernardino Civic Center, to the San Bernardino Transit Center, Inland Center Mall, then will proceed eastward along Hospitality Lane to Hunts and to Carnegie, then south along Anderson to Redlands Boulevard Park and Ride, then Loma Linda University and ultimately to the V.A. Hospital on Prospect, Barton, and Benton. There will be no weekend service.
		Medium	Medium	Medium	3, 4	2-Sep-14	Routes 3 and 4 have had service frequency improved to every 15 minutes after 8 AM.
	New	New	New		5	2-Sep-14	Route 5 has been realigned to travel on Waterman Avenue; will connect with the newly aligned Route 19. Service frequency has been improved to 30-minute service on all days. New alignment travels directly north-south on Waterman, reaches southern EOL at Waterman and Barton, circles back on Washington to Wier, then back north on Waterman to Gilbert, Pacific, Del Rosa, Lynwood, Mountain, then back to the old return alignment on 40th Street to the northerly EOL at CSUSB.
	Major	Major	Major	Major	8	2-Sep-14	Route 8 now has a long trip traveling from downtown San Bernardino to Crafton Hills College, and a short trip traveling from downtown San Bernardino to Redlands Mall. Route 8 no longer travels to Yucaipa Transit Center.
	Eliminate	Eliminate	Eliminate	Eliminate	9	2-Sep-14	Route 9 is eliminated. Sections of this route are now incorporated into a longer Route 19.
	New	New	New	New	19	2-Sep-14	Route 19 has been expanded and lengthened, and has incorporated portions of old Route 9. It now travels all the way from Yucaipa Transit Center to Fontana Metrolink. It is now realigned as well so as to make an important connection to the VA Hospital in Loma Linda. Weekday service is now 30-minutes, and weekend service is 60-minute frequency.
	Major	Major	Major	Major	20	2-Sep-14	Route 20 now travels on Juniper and Merrill to and from the Fontana Transit Center, and eliminates service on Sierra. Service frequency has been reduced to 60-minutes on all days.
	Medium	Medium	Medium	Medium	22	2-Sep-14	Route 22 now travels along Valley Boulevard to and from Arrowhead Regional Medical Center (ARMC), and eliminates travel along Wild Rose, San Bernardino, and Pepper.
			Medium	Medium	215	2-Sep-14	Route 215 service frequency has been increased to 30-minute frequency on mid-day weekends.
					VETERANS FARE	5-Jan-15	New fare and passes adopted to honor veterans.
					14	4-May-15	Minor run time adjustments.
					20	4-May-15	Minor run time adjustments.
					61	4-May-15	Minor run time adjustments.
					215	4-May-15	Minor run time adjustments.
Yes	Major	Major	Major	Major	SBTC	7-Sep-15	New San Bernardino Transit Center will open at Rialto and E Street in downtown San Bernardino. All routes currently serving Fourth Street Transfer Center will instead serve this facility, and will be realigned accordingly.
	Major	Major	Major	Major	1	7-Sep-15	Realignment from 3rd to 2nd Street to serve SBTC; NE EOL will extend to Victoria and Lynwood, extending service just outside San Manuel Casino; frequency enhanced to 15 minutes.
	Medium	Major	Medium	Medium	2	7-Sep-15	Realigned to E Street between 6th Street and Rialto Avenue; frequency

Monitor	Map	Weekday	Saturday	Sunday	Route	Date	Description
							reduced from 30-minute to 60-minute on weekdays.
	Medium	Medium	Medium	Medium	3	7-Sep-15	Realigned from 4th Street to Rialto to serve SBTC.
	Medium	Medium	Medium	Medium	4	7-Sep-15	Realigned from 4th Street to Rialto to serve SBTC.
	Medium	Medium	Medium	Medium	7	7-Sep-15	Realigned from 5th Street to Rialto to serve SBTC
	Major	Major	Major	Major	8	7-Sep-15	Routing changes at Tippecanoe and Mill Street, travels to Sierra Way, then Rialto to serve SBTC; former lost elements of Tippecanoe, Sheppard, Del Rosa, 3rd, Palm, etc., will be incorporated into Route 15.
	Major	Major	Major	Major	10	7-Sep-15	Travels south from Baseline onto G Street, instead of F Street, to now serve SBTC.
	Major	Major	Major	Major	11	7-Sep-15	Southern EOL of route realigned from G Street to Baseline, D Street, and Rialto to serve SBTC; G Street component will be transferred to route 10.
	Medium	Medium	Medium	Medium	14	7-Sep-15	Realigned from H Street to D Street to serve SBTC.
	Major	Major	Major	Major	15	7-Sep-15	Major realignment from 9th, D Street, 5th, F Street, to 9th, Del Rosa, Harry Sheppard, Tippecanoe, 3rd, Rialto, to serve SBTC.
	Medium	Medium	Medium	Medium	215	7-Sep-15	Realigned to an EOL along 2nd Street to SBTC.
	Eliminate	Eliminate	Eliminate	Eliminate	63	7-Sep-15	Route 63 eliminated. Route segments will be renumbered, moved to 61, 84, and 86.
	Eliminate	Eliminate	Eliminate	Eliminate	65	7-Sep-15	Route 65 eliminated. Route segments will be renumbered, moved to 85, 88.
	Major	Major	Major	Major	67	7-Sep-15	Westernmost EOL will change from Baseline, Campus, 19th, Mountain, 7th, Central, Richton, Montclair Transit Center, to Baseline, Archibald, Lemon, Haven, to Chaffey College Transit Center. This provides for direct routing from Fontana Metrolink to Chaffey College. Campus to Mountain portion will be moved to Route 84.
	Eliminate	Eliminate	Eliminate	Eliminate	68	7-Sep-15	Route 68 eliminated. Route segments will be renumbered, moved to 85, 88.
	Major	Major	Major	Major	80	7-Sep-15	Service will connect Chaffey College directly to downtown Ontario. The Holt to Mountain to PaloVerde to Monte Vista to Richton to Montclair section will be reapportioned to routes 61, 84, 85, and 88.
	Major	Major	Major	Major	81	7-Sep-15	Service will be streamlined dramatically. Northern portion of run will be realigned along Haven from Chaffey College to Ontario Mills to Riverside Drive, then will be realigned along Riverside more directly to Chino Transit Center. Former elements of the route will be incorporated into routes 82 and 85 (from Banyan to Ontario Mills), and to route 86 (from Vineyard to Ontario Civic Center).
	Major	Major	Major	Major	82	7-Sep-15	Western portion of this route will be moved from Haven to Milliken, connecting Jurupa and Milliken to Ontario Mills to Victorian Gardens. The former western portion of the route along Haven to Rancho Cucamonga Civic Center will be picked up by realigned Route 81.
	Major	Major	Major	Major	83	7-Sep-15	Service extends to provide service to the College Park area of Chino, reducing turns and making it more efficient and timely.
	New	New	New	New	84	7-Sep-15	New route. Originally derived from portions of former route 63, it realigns and straightens; most of the old route 63 components are moved to new route 86 or are incorporated into routes 61 and 81. This new route provides direct and continuous north-south service along majority of Mountain Avenue, connecting Chino, Ontario, and Upland.
	New	New	New	New	85	7-Sep-15	New route. Incorporates many of the services currently provided by routes 65,

Monitor	Map	Weekday	Saturday	Sunday	Route	Date	Description
							68, and 81. Will provide 30-minute weekday service between Chino Transit Center and Chaffey College on Central, Arrow, and Milliken.
	New	New	New	New	86	7-Sep-15	New route that incorporates portions of current routes 63 and 81, and which will connect Ontario and Upland, near the San Antonio Hospital by way of Vineyard and Campus avenues.
	New	New	New	New	88	7-Sep-15	New route. Will provide 60-minute service on Ramona Avenue, connecting Montclair Transit Center to Chino Hills by incorporating salient elements of old routes 65 and 68.
	New	New	New	New	290	7-Sep-15	Pilot I-10 Freeway Peak Period Express Service. This new route will consist of 15 single-direction peak service trips per weekday along I-10 from SBTC in the East to Montclair Transit Center in the West. It will have only four stops along the way: SBTC, Arrowhead Regional Medical Center, Ontario Mills, and Montclair Transit Center (MTC). This should obviate the current need for transfers to travel between SBTC and MTC, and should roughly halve the current travel time.

APPENDIX-F MINORITY AND LOW-INCOME WHITE POPULATIONS BY CENSUS TRACT

#	TRACT# CENSUS 2010	GEOID10	NAME10	NAMELSAD10	TOTAL POP	MINORITY	PERCENT MINORITY	Number LI White	M_LI_White (LIM)	LIM_Prcnt	POP_DENSITY (per sq mile)
1	103	6071000103	1.03	Census Tract 1.03	4740	3374	0.711875	45	3419	72.12	2232.8
2	104	6071000104	1.04	Census Tract 1.04	6117	4582	0.749101	21	4603	75.24	2429.3
3	105	6071000105	1.05	Census Tract 1.05	6676	4986	0.746892	49	5035	75.41	2098.9
4	107	6071000107	1.07	Census Tract 1.07	2956	1440	0.487153	4	1444	48.82	1923.8
5	108	6071000108	1.08	Census Tract 1.08	5076	2925	0.576211	31	2956	58.21	2425.4
6	109	6071000109	1.09	Census Tract 1.09	6751	3176	0.470458	238	3414	50.56	3059.2
7	113	6071000113	1.13	Census Tract 1.13	11112	8117	0.730496	144	8261	74.34	3465.7
8	115	6071000115	1.15	Census Tract 1.15	7114	5116	0.719185	12	5128	72.07	1257.2
9	117	6071000117	1.17	Census Tract 1.17	6958	4642	0.667098	13	4655	66.88	2283.2
10	118	6071000118	1.18	Census Tract 1.18	4541	3407	0.750330	66	3473	76.46	714.5
11	201	6071000201	2.01	Census Tract 2.01	4195	3500	0.834366	108	3608	85.99	1988.7
12	203	6071000203	2.03	Census Tract 2.03	4474	3640	0.813631	0	3640	81.34	2877.4
13	205	6071000205	2.05	Census Tract 2.05	4736	3711	0.783618	13	3724	78.62	2938.7
14	207	6071000207	2.07	Census Tract 2.07	4635	4031	0.869715	70	4101	88.46	3144.0
15	208	6071000208	2.08	Census Tract 2.08	4124	3355	0.813576	14	3369	81.67	2767.2
16	301	6071000301	3.01	Census Tract 3.01	8795	8333	0.947476	213	8546	97.16	4362.0
17	303	6071000303	3.03	Census Tract 3.03	7169	6388	0.891074	149	6537	91.17	4005.0
18	304	6071000304	3.04	Census Tract 3.04	5871	4985	0.849114	7	4992	85.01	2630.8
19	401	6071000401	4.01	Census Tract 4.01	6386	4200	0.657639	142	4342	67.97	1960.6
20	403	6071000403	4.03	Census Tract 4.03	4677	3068	0.655909	243	3311	70.76	2042.6
21	404	6071000404	4.04	Census Tract 4.04	4419	3010	0.681222	128	3138	71.00	2141.4
22	501	6071000501	5.01	Census Tract 5.01	6785	4928	0.726348	72	5000	73.68	3429.0
23	503	6071000503	5.03	Census Tract 5.03	5270	4087	0.775564	80	4167	79.06	3549.1
24	504	6071000504	5.04	Census Tract 5.04	5450	3686	0.676390	45	3731	68.45	1071.6
25	603	6071000603	6.03	Census Tract 6.03	5576	4041	0.724762	99	4140	74.23	3015.3
26	604	6071000604	6.04	Census Tract 6.04	5682	4172	0.734295	131	4303	75.72	3064.0
27	605	6071000605	6.05	Census Tract 6.05	5274	4910	0.930995	50	4960	94.03	3558.4
28	606	6071000606	6.06	Census Tract 6.06	4374	3575	0.817371	26	3601	82.31	3202.9
29	808	6071000808	8.08	Census Tract 8.08	5839	3053	0.522856	78	3131	53.60	2964.8
30	812	6071000812	8.12	Census Tract 8.12	3844	1735	0.451378	71	1806	46.96	1870.6
31	813	6071000813	8.13	Census Tract 8.13	3447	1355	0.393043	71	1426	41.33	1704.6
32	814	6071000814	8.14	Census Tract 8.14	3830	1305	0.340725	122	1427	37.23	1872.6
33	815	6071000815	8.15	Census Tract 8.15	3583	1632	0.455509	72	1704	47.53	1847.9

#	TRACT# CENSUS 2010	GEOID10	NAME10	NAMELSAD10	TOTAL POP	MINORITY	PERCENT MINORITY	Number LI White	M_LI_White (LIM)	LIM_Prcnt	POP_DENSITY (per sq mile)
34	816	6071000816	8.16	Census Tract 8.16	3904	1471	0.376760	85	1556	39.83	1993.5
35	817	6071000817	8.17	Census Tract 8.17	3263	1504	0.460949	55	1559	47.75	1310.5
36	818	6071000818	8.18	Census Tract 8.18	5427	2358	0.434518	106	2464	45.39	2624.1
37	819	6071000819	8.19	Census Tract 8.19	5076	2456	0.483852	162	2618	51.56	2259.8
38	820	6071000820	8.2	Census Tract 8.20	3956	1451	0.366759	106	1557	39.33	1465.0
39	821	6071000821	8.21	Census Tract 8.21	3478	2367	0.680655	63	2430	69.85	1788.6
40	823	6071000823	8.23	Census Tract 8.23	6658	4629	0.695300	257	4886	73.37	3879.6
41	824	6071000824	8.24	Census Tract 8.24	5091	3339	0.655802	177	3516	69.04	3311.3
42	825	6071000825	8.25	Census Tract 8.25	3905	3045	0.779826	103	3148	80.59	2873.3
43	826	6071000826	8.26	Census Tract 8.26	4074	2658	0.652355	83	2741	67.25	2492.0
44	901	6071000901	9.01	Census Tract 9.01	4599	2817	0.612476	90	2907	63.18	2716.8
45	903	6071000903	9.03	Census Tract 9.03	4338	3339	0.769763	176	3515	81.01	2901.9
46	904	6071000904	9.04	Census Tract 9.04	3248	2389	0.735611	27	2416	74.36	2253.1
47	1001	6071001001	10.01	Census Tract 10.01	4990	4030	0.807654	125	4155	83.25	3229.5
48	1002	6071001002	10.02	Census Tract 10.02	5530	4984	0.901284	23	5007	90.53	3804.1
49	1101	6071001101	11.01	Census Tract 11.01	4092	3619	0.884437	35	3654	89.27	3151.4
50	1103	6071001103	11.03	Census Tract 11.03	3996	2439	0.610305	77	2516	62.93	2463.0
51	1104	6071001104	11.04	Census Tract 11.04	5058	3407	0.673651	170	3577	70.71	3018.0
52	1200	6071001200	12	Census Tract 12	4729	2976	0.629254	29	3005	63.52	2977.7
53	1305	6071001305	13.05	Census Tract 13.05	5348	4773	0.892503	27	4800	89.74	3702.1
54	1307	6071001307	13.07	Census Tract 13.07	4163	3572	0.858069	176	3748	90.01	2806.3
55	1308	6071001308	13.08	Census Tract 13.08	5100	4515	0.885317	0	4515	88.51	3626.4
56	1309	6071001309	13.09	Census Tract 13.09	4793	4258	0.888402	163	4421	92.22	3214.3
57	1310	6071001310	13.1	Census Tract 13.10	5814	4723	0.812382	33	4756	81.79	3787.9
58	1311	6071001311	13.11	Census Tract 13.11	3236	2435	0.752549	0	2435	75.22	2049.1
59	1312	6071001312	13.12	Census Tract 13.12	4645	3653	0.786483	34	3687	79.36	2301.0
60	1400	6071001400	14	Census Tract 14	2923	2254	0.771204	18	2272	77.70	2041.0
61	1501	6071001501	15.01	Census Tract 15.01	4052	3736	0.922033	60	3796	93.66	3157.2
62	1503	6071001503	15.03	Census Tract 15.03	4195	3995	0.952336	9	4004	95.42	3471.2
63	1504	6071001504	15.04	Census Tract 15.04	5676	5224	0.920380	171	5395	95.03	3824.7
64	1600	6071001600	16	Census Tract 16	6133	5778	0.942126	69	5847	95.32	1079.2
65	1702	6071001702	17.02	Census Tract 17.02	4827	3358	0.695733	56	3414	70.71	2485.3
66	1703	6071001703	17.03	Census Tract 17.03	5978	3931	0.657525	82	4013	67.11	3489.4
67	1704	6071001704	17.04	Census Tract 17.04	5056	4078	0.806605	104	4182	82.70	2869.1
68	1706	6071001706	17.06	Census Tract 17.06	6231	5503	0.883184	35	5538	88.86	4396.4
69	1707	6071001707	17.07	Census Tract 17.07	5966	5110	0.856544	41	5151	86.32	3640.4

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70	1803	6071001803	18.03	Census Tract 18.03	2985	2062	0.690891	18	2080	69.66	668.5
71	1804	6071001804	18.04	Census Tract 18.04	5145	4088	0.794598	10	4098	79.63	3256.0
72	1806	6071001806	18.06	Census Tract 18.06	4760	3590	0.754253	47	3637	76.39	3069.8
73	1808	6071001808	18.08	Census Tract 18.08	4413	3367	0.763027	10	3377	76.51	3094.7
74	1809	6071001809	18.09	Census Tract 18.09	4476	3620	0.808801	175	3795	84.77	2370.1
75	1810	6071001810	18.1	Census Tract 18.10	4497	4016	0.893064	0	4016	89.28	3264.6
76	1812	6071001812	18.12	Census Tract 18.12	4321	4073	0.942619	98	4171	96.51	3219.7
77	1813	6071001813	18.13	Census Tract 18.13	4576	4426	0.967227	0	4426	96.70	2882.0
78	1901	6071001901	19.01	Census Tract 19.01	5753	3938	0.684567	19	3957	68.77	3322.3
79	1905	6071001905	19.05	Census Tract 19.05	6389	4433	0.693897	46	4479	70.09	980.5
80	1906	6071001906	19.06	Census Tract 19.06	7060	5366	0.760091	12	5378	76.16	1790.7
81	2013	6071002013	20.13	Census Tract 20.13	4206	1730	0.411359	38	1768	42.02	2376.9
82	2015	6071002015	20.15	Census Tract 20.15	4776	2220	0.464839	78	2298	48.10	2699.9
83	2016	6071002016	20.16	Census Tract 20.16	3882	1881	0.484552	21	1902	48.97	2302.3
84	2018	6071002018	20.18	Census Tract 20.18	5341	2561	0.479506	193	2754	51.54	2694.8
85	2019	6071002019	20.19	Census Tract 20.19	4756	2748	0.577764	65	2813	59.12	2449.4
86	2021	6071002021	20.21	Census Tract 20.21	5200	2558	0.491926	0	2558	49.17	1445.4
87	2023	6071002023	20.23	Census Tract 20.23	5117	2744	0.536238	115	2859	55.85	3268.0
88	2025	6071002025	20.25	Census Tract 20.25	5055	2167	0.428713	78	2245	44.39	2994.6
89	2027	6071002027	20.27	Census Tract 20.27	5542	2861	0.516234	209	3070	55.38	3195.6
90	2028	6071002028	20.28	Census Tract 20.28	5281	2991	0.566345	64	3055	57.83	2952.5
91	2029	6071002029	20.29	Census Tract 20.29	6076	3150	0.518427	28	3178	52.29	3478.2
92	2031	6071002031	20.31	Census Tract 20.31	6280	3681	0.586119	80	3761	59.87	3574.5
93	2033	6071002033	20.33	Census Tract 20.33	7662	4232	0.552323	2	4234	55.25	3456.9
94	2034	6071002034	20.34	Census Tract 20.34	13758	9370	0.681081	481	9851	71.60	3671.0
95	2035	6071002035	20.35	Census Tract 20.35	6873	4087	0.594618	39	4126	60.01	3790.6
96	2036	6071002036	20.36	Census Tract 20.36	11640	7751	0.665922	484	8235	70.74	5270.7
97	2037	6071002037	20.37	Census Tract 20.37	7739	5970	0.771447	54	6024	77.83	2821.4
98	2038	6071002038	20.38	Census Tract 20.38	5366	4224	0.787218	90	4314	80.38	3027.3
99	2101	6071002101	21.01	Census Tract 21.01	4399	3612	0.821136	67	3679	83.61	3039.0
100	2103	6071002103	21.03	Census Tract 21.03	4646	3151	0.678287	120	3271	70.39	3506.3
101	2105	6071002105	21.05	Census Tract 21.05	5036	3416	0.678380	150	3566	70.80	2224.6
102	2107	6071002107	21.07	Census Tract 21.07	4970	3469	0.698049	51	3520	70.81	3218.3
103	2109	6071002109	21.09	Census Tract 21.09	4626	3394	0.733737	15	3409	73.68	1639.8
104	2110	6071002110	21.1	Census Tract 21.10	7020	4905	0.698761	57	4962	70.67	1218.1
105	2204	6071002204	22.04	Census Tract 22.04	6139	5426	0.883876	155	5581	90.90	741.6

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106	2206	6071002206	22.06	Census Tract 22.06	6656	4905	0.736969	102	5007	75.21	3790.1
107	2207	6071002207	22.07	Census Tract 22.07	4461	3353	0.751681	14	3367	75.46	1113.7
108	2301	6071002301	23.01	Census Tract 23.01	9721	8625	0.887266	34	8659	89.07	3089.1
109	2304	6071002304	23.04	Census Tract 23.04	18904	14387	0.761069	215	14602	77.24	4018.2
110	2305	6071002305	23.05	Census Tract 23.05	10725	8950	0.834514	242	9192	85.70	3562.7
111	2306	6071002306	23.06	Census Tract 23.06	4169	3693	0.885851	44	3737	89.62	1431.2
112	2307	6071002307	23.07	Census Tract 23.07	5085	4508	0.886551	37	4545	89.36	3141.5
113	2401	6071002401	24.01	Census Tract 24.01	8946	8244	0.921538	59	8303	92.80	3599.2
114	2402	6071002402	24.02	Census Tract 24.02	8434	7868	0.932899	0	7868	93.28	3411.3
115	2501	6071002501	25.01	Census Tract 25.01	5840	5396	0.923986	22	5418	92.76	2332.4
116	2502	6071002502	25.02	Census Tract 25.02	8051	7330	0.910457	127	7457	92.61	4070.0
117	2601	6071002601	26.01	Census Tract 26.01	10799	9263	0.857778	42	9305	86.16	1187.8
118	2602	6071002602	26.02	Census Tract 26.02	7639	6782	0.887827	29	6811	89.15	4343.7
119	2604	6071002604	26.04	Census Tract 26.04	5723	5021	0.877358	18	5039	88.03	4055.0
120	2606	6071002606	26.06	Census Tract 26.06	7089	6312	0.890409	112	6424	90.61	3464.1
121	2607	6071002607	26.07	Census Tract 26.07	7826	7117	0.909416	34	7151	91.36	2783.8
122	2703	6071002703	27.03	Census Tract 27.03	5780	4273	0.739318	237	4510	78.01	3326.6
123	2704	6071002704	27.04	Census Tract 27.04	10787	8593	0.796626	53	8646	80.14	1493.7
124	2705	6071002705	27.05	Census Tract 27.05	5513	4547	0.824810	0	4547	82.46	2673.3
125	2801	6071002801	28.01	Census Tract 28.01	5508	5028	0.912870	154	5182	94.06	3670.4
126	2803	6071002803	28.03	Census Tract 28.03	3982	3624	0.910118	5	3629	91.11	2891.3
127	2804	6071002804	28.04	Census Tract 28.04	5417	5189	0.957918	104	5293	97.69	3929.6
128	2901	6071002901	29.01	Census Tract 29.01	4446	3909	0.879244	44	3953	88.89	2986.5
129	2902	6071002902	29.02	Census Tract 29.02	6584	5575	0.846773	91	5666	86.04	3797.0
130	3000	6071003000	30	Census Tract 30	3120	2638	0.845562	44	2682	85.93	2097.1
131	3101	6071003101	31.01	Census Tract 31.01	5040	4542	0.901210	45	4587	90.99	3315.6
132	3102	6071003102	31.02	Census Tract 31.02	5466	5069	0.927382	53	5122	93.69	3669.6
133	3200	6071003200	32	Census Tract 32	8005	6381	0.797152	95	6476	80.89	4048.3
134	3301	6071003301	33.01	Census Tract 33.01	4841	4185	0.864519	232	4417	91.22	2796.9
135	3302	6071003302	33.02	Census Tract 33.02	6037	4880	0.808380	202	5082	84.17	2992.8
136	3401	6071003401	34.01	Census Tract 34.01	7502	6450	0.859789	142	6592	87.86	3793.5
137	3403	6071003403	34.03	Census Tract 34.03	4524	3771	0.833591	123	3894	86.06	2608.9
138	3404	6071003404	34.04	Census Tract 34.04	4946	4393	0.888215	167	4560	92.18	3578.3
139	3405	6071003405	34.05	Census Tract 34.05	5109	4636	0.907436	55	4691	91.80	3778.5
140	3503	6071003503	35.03	Census Tract 35.03	5489	4958	0.903279	22	4980	90.71	2214.2
141	3505	6071003505	35.05	Census Tract 35.05	5969	5610	0.939866	51	5661	94.82	3998.0

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142	3506	6071003506	35.06	Census Tract 35.06	4802	4375	0.911097	28	4403	91.67	2974.0
143	3507	6071003507	35.07	Census Tract 35.07	4887	4341	0.888298	10	4351	89.01	3025.6
144	3509	6071003509	35.09	Census Tract 35.09	4827	4216	0.873447	230	4446	92.09	2781.7
145	3510	6071003510	35.1	Census Tract 35.10	4512	4238	0.939287	101	4339	96.14	2283.6
146	3603	6071003603	36.03	Census Tract 36.03	4141	3663	0.884597	0	3663	88.44	2777.1
147	3605	6071003605	36.05	Census Tract 36.05	4223	3702	0.876657	276	3978	94.18	2835.0
148	3606	6071003606	36.06	Census Tract 36.06	5109	4356	0.852642	81	4437	86.83	2622.0
149	3607	6071003607	36.07	Census Tract 36.07	5369	4740	0.882868	10	4750	88.45	3178.4
150	3609	6071003609	36.09	Census Tract 36.09	4871	4250	0.872537	46	4296	88.18	2670.0
151	3611	6071003611	36.11	Census Tract 36.11	4575	4290	0.937719	46	4336	94.76	3681.0
152	3612	6071003612	36.12	Census Tract 36.12	4256	3729	0.876204	32	3761	88.35	2021.7
153	3700	6071003700	37	Census Tract 37	3903	3497	0.896004	104	3601	92.24	2623.0
154	3801	6071003801	38.01	Census Tract 38.01	4735	4180	0.882813	24	4204	88.77	2773.1
155	3803	6071003803	38.03	Census Tract 38.03	4732	4171	0.881471	0	4171	88.13	2915.8
156	3804	6071003804	38.04	Census Tract 38.04	4578	4076	0.890369	75	4151	90.65	1951.7
157	3900	6071003900	39	Census Tract 39	5484	4831	0.880948	30	4861	88.62	3444.9
158	4001	6071004001	40.01	Census Tract 40.01	4763	4160	0.873426	290	4450	93.41	2137.2
159	4003	6071004003	40.03	Census Tract 40.03	6178	5413	0.876194	63	5476	88.62	1603.7
160	4101	6071004101	41.01	Census Tract 41.01	5698	5094	0.894017	16	5110	89.66	2283.8
161	4103	6071004103	41.03	Census Tract 41.03	5634	5282	0.937533	99	5381	95.49	2686.6
162	4104	6071004104	41.04	Census Tract 41.04	5257	4686	0.891404	39	4725	89.86	1542.0
163	4201	6071004201	42.01	Census Tract 42.01	6854	6632	0.967615	0	6632	96.75	3017.2
164	4202	6071004202	42.02	Census Tract 42.02	5176	4939	0.954221	147	5086	98.24	3072.4
165	4301	6071004301	43.01	Census Tract 43.01	4677	4372	0.934801	0	4372	93.46	3044.3
166	4302	6071004302	43.02	Census Tract 43.02	4413	4070	0.922293	112	4182	94.74	2064.2
167	4401	6071004401	44.01	Census Tract 44.01	4383	3766	0.859261	97	3863	88.12	2618.8
168	4403	6071004403	44.03	Census Tract 44.03	5647	5092	0.901735	33	5125	90.74	3744.2
169	4404	6071004404	44.04	Census Tract 44.04	5570	4938	0.886555	160	5098	91.51	3504.2
170	4504	6071004504	45.04	Census Tract 45.04	8144	5294	0.650012	141	5435	66.72	2265.8
171	4505	6071004505	45.05	Census Tract 45.05	4724	3266	0.691429	78	3344	70.77	2890.4
172	4507	6071004507	45.07	Census Tract 45.07	5042	3702	0.734285	316	4018	79.67	2943.0
173	4509	6071004509	45.09	Census Tract 45.09	4763	2910	0.610913	61	2971	62.35	2649.8
174	4510	6071004510	45.1	Census Tract 45.10	5178	3841	0.741842	153	3994	77.12	1749.3
175	4601	6071004601	46.01	Census Tract 46.01	7032	5121	0.728281	309	5430	77.21	2864.0
176	4603	6071004603	46.03	Census Tract 46.03	5717	3960	0.692725	376	4336	75.83	2190.2
177	4604	6071004604	46.04	Census Tract 46.04	5177	3943	0.761684	130	4073	78.66	2694.6

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178	4700	6071004700	47	Census Tract 47	5791	5583	0.964088	21	5604	96.75	3305.7
179	4800	6071004800	48	Census Tract 48	3282	3206	0.976850	95	3301	100.55	2479.8
180	4900	6071004900	49	Census Tract 49	7590	7088	0.933869	88	7176	94.53	2674.6
181	5100	6071005100	51	Census Tract 51	7748	4834	0.623871	330	5164	66.63	2674.3
182	5200	6071005200	52	Census Tract 52	4141	2910	0.702801	128	3038	73.35	2370.2
183	5300	6071005300	53	Census Tract 53	5516	4554	0.825630	174	4728	85.70	3333.9
184	5400	6071005400	54	Census Tract 54	6590	5774	0.876195	205	5979	90.71	3914.9
185	5500	6071005500	55	Census Tract 55	8618	7949	0.922381	190	8139	94.43	5175.7
186	5600	6071005600	56	Census Tract 56	7101	6500	0.915376	345	6845	96.38	4180.7
187	5701	6071005701	57.01	Census Tract 57.01	2216	1790	0.807848	13	1803	81.33	957.3
188	5800	6071005800	58	Census Tract 58	3981	3698	0.928930	220	3918	98.39	2444.1
189	6100	6071006100	61	Census Tract 61	8345	5495	0.658440	150	5645	67.63	3129.6
190	6201	6071006201	62.01	Census Tract 62.01	3583	2623	0.732143	32	2655	74.08	2245.2
191	6203	6071006203	62.03	Census Tract 62.03	4771	3982	0.834661	241	4223	88.50	3206.6
192	6204	6071006204	62.04	Census Tract 62.04	4495	3739	0.831851	183	3922	87.23	3149.8
193	6301	6071006301	63.01	Census Tract 63.01	5324	4057	0.762066	347	4404	82.70	2668.8
194	6302	6071006302	63.02	Census Tract 63.02	8815	7432	0.843126	888	8320	94.37	4454.0
195	6401	6071006401	64.01	Census Tract 64.01	3343	3120	0.933313	63	3183	95.19	1895.4
196	6402	6071006402	64.02	Census Tract 64.02	4951	4444	0.897617	98	4542	91.72	2839.6
197	6500	6071006500	65	Census Tract 65	8386	7177	0.855848	212	7389	88.10	3373.3
198	6601	6071006601	66.01	Census Tract 66.01	4564	3981	0.872289	12	3993	87.47	2563.4
199	6603	6071006603	66.03	Census Tract 66.03	4958	4394	0.886267	15	4409	88.91	2933.8
200	6604	6071006604	66.04	Census Tract 66.04	4278	4038	0.943912	17	4055	94.77	3126.5
201	6700	6071006700	67	Census Tract 67	4486	4142	0.923334	65	4207	93.76	2613.4
202	7000	6071007000	70	Census Tract 70	7898	7372	0.933409	158	7530	95.33	4254.0
203	7104	6071007104	71.04	Census Tract 71.04	4092	2015	0.492428	50	2065	50.44	1557.3
204	7106	6071007106	71.06	Census Tract 71.06	3942	2154	0.546400	91	2245	56.92	1912.4
205	7107	6071007107	71.07	Census Tract 71.07	3302	2590	0.784438	121	2711	82.08	1709.8
206	7108	6071007108	71.08	Census Tract 71.08	2202	1802	0.818429	39	1841	83.57	1044.2
207	7109	6071007109	71.09	Census Tract 71.09	6064	4045	0.667106	95	4140	68.26	3049.4
208	7110	6071007110	71.1	Census Tract 71.10	4831	3607	0.746689	20	3627	75.06	2493.4
209	7200	6071007200	72	Census Tract 72	6798	5609	0.825121	113	5722	84.16	1494.2
210	7303	6071007303	73.03	Census Tract 73.03	4828	3347	0.693311	445	3792	78.53	2396.8
211	7305	6071007305	73.05	Census Tract 73.05	4060	2990	0.736518	293	3283	80.84	2526.2
212	7306	6071007306	73.06	Census Tract 73.06	5859	3929	0.670648	169	4098	69.93	2601.5
213	7403	6071007403	74.03	Census Tract 74.03	6946	4400	0.633420	1057	5457	78.54	2811.6

#	TRACT# CENSUS 2010	GEOID10	NAME10	NAMELSAD10	TOTAL POP	MINORITY	PERCENT MINORITY	Number LI White	M_LI_White (LIM)	LIM_Prcnt	POP_DENSITY (per sq mile)
214	7404	6071007404	74.04	Census Tract 74.04	4405	2020	0.458589	149	2169	49.22	1821.0
215	7407	6071007407	74.07	Census Tract 74.07	2940	2574	0.875553	96	2670	90.79	1973.6
216	7408	6071007408	74.08	Census Tract 74.08	4181	3510	0.839550	88	3598	86.04	2805.4
217	7409	6071007409	74.09	Census Tract 74.09	5760	4059	0.704739	127	4186	72.66	3093.4
218	7410	6071007410	74.1	Census Tract 74.10	5519	3763	0.681884	333	4096	74.20	2967.4
219	7601	6071007601	76.01	Census Tract 76.01	7277	6380	0.876752	401	6781	93.17	3674.2
220	7603	6071007603	76.03	Census Tract 76.03	4605	3677	0.798524	75	3752	81.46	2820.3
221	7604	6071007604	76.04	Census Tract 76.04	4306	2919	0.677966	45	2964	68.82	1118.6
222	7800	6071007800	78	Census Tract 78	4911	2742	0.558315	125	2867	58.36	633.5
223	7901	6071007901	79.01	Census Tract 79.01	7907	3853	0.487293	64	3917	49.53	1432.4
224	7903	6071007903	79.03	Census Tract 79.03	4364	2207	0.505726	72	2279	52.20	2292.2
225	8001	6071008001	80.01	Census Tract 80.01	6513	4845	0.743936	212	5057	77.63	2290.0
226	8002	6071008002	80.02	Census Tract 80.02	7256	6034	0.831611	198	6232	85.88	3089.5
227	8100	6071008100	81	Census Tract 81	3181	1607	0.505184	305	1912	60.07	1871.8
228	8200	6071008200	82	Census Tract 82	5144	1380	0.268260	230	1610	31.27	2722.3
229	8301	6071008301	83.01	Census Tract 83.01	6338	2139	0.337486	297	2436	38.42	2511.1
230	8401	6071008401	84.01	Census Tract 84.01	9952	4835	0.485835	287	5122	51.46	2542.4
231	8402	6071008402	84.02	Census Tract 84.02	6446	2435	0.377733	200	2635	40.86	3267.4
232	8403	6071008403	84.03	Census Tract 84.03	5831	1922	0.329619	199	2121	36.36	1953.1
233	8404	6071008404	84.04	Census Tract 84.04	2728	1650	0.604762	199	1849	67.73	1833.6
234	8601	6071008601	86.01	Census Tract 86.01	5617	2845	0.506496	353	3198	56.91	1908.6
235	8705	6071008705	87.05	Census Tract 87.05	4616	1897	0.411000	270	2167	46.93	1688.4
236	8706	6071008706	87.06	Census Tract 87.06	12296	4190	0.340759	709	4899	39.83	1518.1
237	8708	6071008708	87.08	Census Tract 87.08	4350	1247	0.286699	41	1288	29.59	1866.1
238	8709	6071008709	87.09	Census Tract 87.09	4160	1431	0.343983	628	2059	49.46	2021.7
239	8710	6071008710	87.1	Census Tract 87.10	4441	1977	0.445195	348	2325	52.33	2621.5
240	8800	6071008800	88	Census Tract 88	6380	2372	0.371769	439	2811	44.04	2908.8
241	12300	6071012300	123	Census Tract 123	1512	888	0.587186	700	1588	104.89	1143.1
242	12400	6071012400	124	Census Tract 124	3617	3294	0.910724	33	3327	91.96	824.8
243	12500	6071012500	125	Census Tract 125	4268	3982	0.933005	67	4049	94.85	1653.9
244	12700	6071012700	127	Census Tract 127	4052	2930	0.723168	0	2930	72.29	364.9
245	980100	6071980100	9801	Census Tract 9801	0	0	0.000000	0	0	0.00	0.0

APPENDIX-G RECORD OF COMPLAINTS RECORDED IN TRAPEZE COM, 2012 TO 2015

The record of complaints recorded in Trapeze Com begins on the following page.

APPENDIX G: TRAPEZE COM RECORD OF LOGGED COMPLAINTS FROM MID-2012 TO 2015

Feedback Number	Date Received	City	Zip Code	Method Received	Description of Comment or Complaint	Outcome of Investigation	INTERNAL COMMUNICATION
12019	6/14/2012	RIALTO	92376	Telephone	CALLER STATES THAT OPERATOR #2603 WAS RUDE,SARCASTIC AND DISCRIMINATE. HE STATES THAT AT THE OMM THE DRIVER ASKED HIM "ARE YOU GONNA DO SOMETHING WITH YOURSELF" SO HE STARTED TO REACH FOR HIS PASS AND SHE COMMENTED WITH A RACIAL REMARK "WHAT YOU NEED IS A GREEN CARD"	Post card response mailed to complainant. Incident closed 7/16/2012. Not considered broadbased Title VI service discrimination complaint.	None
12075	6/25/2012	RIALTO	92376	Telephone	CALLER STATES THAT THE OPERATOR OF ROUTE 22 N/B AT THE ARMC IS RACIST AGAINST LATINO AS HE WOULD LET BLACK PEOPLE BOARD HIS BUS DURING HIS BREAK BUT NOT HER WHO IS LATINA. SHE FURTHER STATES THAT THIS HAS HAPPENED ON OTHER OCCASIONS AS WELL.	Videotape reviewed. Post card response mailed to complainant. Incident closed 7/2/2012. Not considered broadbased Title VI service discrimination complaint.	None
12311	8/6/2012	SAN BERNARDINO	92404	Telephone	MS LARA SAID HER SON WAS BORDING ROUTE 3 AT 12:34 AND WAS NOT SURE HE WAS ON THE RIGHT BUS SO HE ASKED DRIVER WHO IS A BLACK FEMALE IF HE WAS ON THE RIGHT BUS AND SHE ANSWERS HIM MEXICANS DON'T KNOW THEIR WAY. SON IS ABOUT 13 OR 14 HE WAS SO UPSET THAT HE WALKED HOME AND IT WAS THE FIRST DAY OF SCHOOL.	Videotape was working and viewed. Incident equivocal. Post card response mailed to complainant; incident closed 9/4/2012. Not considered broadbased Title VI service discrimination complaint.	None
12668	10/2/2012	RANCHO CUCAMONGA	91737	Telephone	(Access Incident) THERE WAS AN INCIDENT WITH AN OTHER GIRL. SO THEY WERE SUPPOSE TO TAKE TURNS OF ONE OF THEM SITTING IN THE BACK. HER DAUGHTER HAS BEEN SITTING IN THE BACK SINCE JULY OF THIS YEAR. MOTHER SPOKE TO SUPERVISOR MS. THOMPSON AND SHE WAS GOING TO TAKE CARE OF IT. WELL IT'S BEEN 2 WEEKS AND DAUGHTER IS STILL SITTING IN THE BACK. MOTHER FEELS IT'S A DISCRIMINATION AGAINST HER DAUGHTER. MOTHER/ARMEN PORTI CALLS SHE WILL GET A LAWYER IF IT DOES NOT CHANGE	Post card response mailed to complainant; incident considered closed on 2/11/2013. Not considered broadbased Title VI service discrimination complaint.	None
12724	10/6/2012	FONTANA	92335	Telephone	CALLER STATES THAT THIS OPERATOR WANTED HIM TO PAY FOR HIS CHILD WHO CALLER THINKS IS UNDER THE 46" RULE BECAUSE OF RACIAL REASONS AGAINST HISPANICS.	Post card response mailed to complainant; on 10/17/2012 customer correspondence returned as undeliverable. Not considered broadbased Title VI service discrimination complaint.	None
12834	10/22/2012	UPLAND	91786	Telephone	CALLER CLAIMS DRIVER IS DISCRIMINATING HER BECAUSE SHE IS MARRIED TO AN AFRICAN AMERICAN. CALLER SAYS SHE ALWAYS GETS THIS BUS TO GET TO AND FROM WORK AND HAS HAD PROBLEMS WITH THE DRIVER SNATCHING HER BUS PASS, TELLING HER IT DOESNT WORK AND CANT USE IT. AND ALSO PASSING HER UP WHEN HE SEES HER AT A BUS STOP. CALLER SAYS HE WAS REALLY FRIENDLY WITH HER BEFORE ONE DAY SHE BOARDED THE BUS WITH HER HUSBAND WHO IS BLACK (SHE IS HISPANIC) AND FROM THEN ON HE HAS BEEN ACTING RUDE WITH HER. CALLER WANTS TO SEE IF DRIVER CAN BE SWITCHED TO A DIFFERENT TIME BECAUSE SINCE THE 67 RUNS EVERY HOUR SHE HAS TO GET THE ONE HE'S ALWAYS DRIVING.	Videotape of incident(s) viewed; it exonerates the coach operator. Post card response mailed to complainant. Incident closed on 2/11/2013. Not considered broadbased Title VI service discrimination complaint.	None
12925	11/5/2012	San Bernardino	92402	Telephone	Driver told passenger with a wheelchair that there was no room for her but there where no other wheelchairs in the bus, passenger felt she was just being denied service because she did not want to deal with the wheelchair.	Incident closed 11/15/2012. Post card response mailed to complainant. Not considered broadbased Title VI service discrimination complaint.	None
12976	11/9/2012	ONTARIO	91764	Telephone	CALLER THINKS THAT THIS OPERATOR #2680 DISCRIMINATES AGAINST HISPANICS SUCH AS HERSELF. SHE STATES THAT HE PASSED HER UP THEN STOPPED A BLOCK AWAY AND WAITED FOR HER. SHE STATES THAT HE DIDNT APOLOGIZE HE JUST LOOKED AT HER. SHE FURTHER STATES THAT SHE NOTICED HE ISN'T VERY KIND WITH HISPANICS.	Incident investigated and closed 2/11/2013. Post card response mailed to complainant. Not considered broadbased Title VI service discrimination complaint.	None
13047	11/26/2012	RIALTO	92376	Telephone	CALLER HAD WKEND PASS FROM METROLINK. DRIVER DIDN'T ACCEPTED THE PASS, SO CALLER WAS GOING TO PAY AND ASKED DRIVER IF HE WAS GOING TO RIALTO ML AND DRIVER SAID,"NO, GET OFF THE BUS". THERE WAS DRIVER EXCHANGE THERE, SO CALLER ASKED NEW DRIVER IF HE ACCEPTED THE METROLINK PASS AND IF HE WENT TO RIALTO ML AND DRIVER SAID "YES". CALLER FEELS ASIAN DRIVER WAS PREJUDICED.	Incident investigated, closed 2/11/2013. Video not viewed. Post card response mailed to complainant. Not considered broadbased Title VI service discrimination complaint.	None
13071	12/3/2012			Telephone	(via attachment): To whom it may concern, On December 1, 2012 a group of six Hispanic passengers as well as my self waited for bus #61 on Marygold Street (South Fontana Trans Center) going to the metro link. It was 1:37 pm and the next bus was schedule to arrive at 1:45 pm. However, the bus didn't arrive until 2:00pm. When it finally arrived, the bus driver did not stop at the bus bench but stopped about 25 feet away from the actual bus stop (making the passengers walk toward him).Upon entering the bus, I decided to ask the bus driver (Employee # 2729) about the bus schedule and why we had to walk about 25 feet to enter the bus. I asked in the following manner "Excuse me; I thought the bus was schedule to be here at 1:45pm, it's 2:00 pm., Is there a reason why it was late? And why did we have to walk about 25 feet to enter the bus? He replied in the outmost rude, demeaning and loud tone manner "This bus is always late when I'm the driver; I'm never on time, and I always stop far away from the bus bench, so GO SIT DOWN!". The passengers were shocked at the bus drivers' response and couldn't believe that such a person with that attitude, character and lack of social skills is working for the Omni bus. I inform the bus driver that I was contacting an Omni Bus supervisor and he replied "Go ahead! I will be here waiting". While I contacted Omni Bus to obtain corporate office number and address, I noticed the bus driver (Employee # 2729) stopped at a bus bench where he picked up an African – American. It was clear that bus driver #2729 holds a prejudice view of Hispanics. We are asking that Bus Driver (Employee #2729) be discipline & re-trained in effort to prevent another bias and unacceptable incident as above. Should you need to contact me, you may call me at 909-333-9443 Diana Diaz. Below is the list of passengers willing to give the same statement/complain as above: Rosario Vasquez Jose Garcia Mario Torres Juan Gutierrez Sofia Hernandez Antony Hernandez	Video checked, action taken; coach operator counseled. Post card response sent to complainant. Not considered broadbased Title VI service discrimination complaint.	
13215	12/26/2012			Walk-In	CUSTOMER STATES THAT THIS CO MADE HIM GET OFF THE BUS FOR 10MINUTES WHILE IT WAS RAINING. CUSTOMER STATED THAT MIKE SUPERVISOR (DIFONZO) WAS THERE AND SPOKE TO THE CUSTOMER. CUSTOMER RODE THE BUS BACK AROUND TO REDLANDS AND THEN GOT OFF...HE NOTICED THAT THE COACH OPERATOR THEN TOLD TWO WHITE PEOPLE TO GET ON THE BUS BECAUSE IT WAS RAINING. HE STATES THIS IS DISCRIMINATION AS DRIVER DID NOT ALLOW HIM TO STAY ON THE BUS. HE REQUESTED OPERATIONS MANAGEMENT INVESTIGATE AND FOLLOW UP WITH HIM. HE IS HIGHLY UPSET AND WANTS A FULL INVESTIGATION WITH VIDEO/AUDIO.	12/26/12 SPOKE TO CUSTOMER IN THE LOBBY AND INFORMED HIM I WOULD BE SENDING THIS UP TO OPERATIONS MANAGEMENT ASAP. MC 12/26/12 FORWARDED TO DIANE CALDERA AND COPIED MR STEFFON MC; 12/27 LETTER SENT. Action taken.	COMMUNICATION: 12/26/12 SPOKE TO CUSTOMER IN THE LOBBY AND INFORMED HIM I WOULD BE SENDING THIS UP TO OPERATIONS MANAGEMENT ASAP. MC 12/26/12 FORWARDED TO DIANE CALDERA
13236	1/2/2013			Telephone	CALLER UPSET BECAUSE SHE SAYS THAT WHEN THE BUS GOT TO HER STOP THE DRIVER WAS TELLING HER TO HURRY UP AND BOARD BECAUSE HE HAD A SCHEDULE TO FOLLOW. CALLER SAYS SHE IS CRIPPLED AND CAN NOT WALK THAT GOOD. CALLER SAYS BUS DRIVER WAS MAKING FUN OF HER WHILE HE WAS EATING A SANDWICH WHILE WORKING. ALSO, CALLER HAS A BUND SON AND A SERVICE DOG AND BUS DRIVER WANTED TO SEE PROOF THAT THE DOG WAS INFACT A SERVICE DOG. HE WOULD NOT ACCEPT THE MEDICAL TAG THE DOG HAS ATTACHED TO IT. CALLER SAYS THE DRIVER WAS DISCRIMINATING AGAINST HER AND HER SON AND WAS MAKING FUN OF THEM. SHE ALSO STATES THAT THE BUS DRIVER MADE HER PAY \$10 FOR HER AND HER SON EVEN THOUGH THEY ARE BOTH DISABLED AND HAVE THE OMNI DISABLED PASS. SHE SAYS THAT WHAT WE ARE DOING IS ILLEGAL AND WILL TAKE THE CASE TO COURT	Videotape of incident reviewed. Incident closed 2/11/2013. Not considered broadbased Title VI service discrimination complaint.	
13316	1/16/2013			Letter	[Rider sent formal written complaint to CEO...paraphrase follows] Homeless woman with large volume in cart attempted to board coach on two separate occasions. First time, young students in front would not vacate seats for her or other handicapped passengers. Both times, coach operator informed her that she couldn't leave cart in the aisle but had to fold it up or lift the seat and move the cart into the space. Rider felt discriminated against, and wrote that she would be suing the agency for five million dollars.	Videotape of incident reviewed; coach operator interviewed. Neither interview or video review fully corroborates incident--much room for individual interpretation here, and it appears coach operator was not in the wrong--operator never yelled, and homeless individual had a large volume of material in her cart. Operator was within his rights to state the rules to the passenger in order to free up the aisle. On the second day, the operator informed the rider that she would have to "be civil and get along with people". Rider contacted. Incident considered closed.	
13336	1/18/2013			Telephone	CALLER SAYS SHE IS DISABLED AND A FEW OF HER FELLOW CO WORKERS WHO ARE ALSO DISABLED BOARDED THE #14 BUS GOING TOWARDS DOWNTOWN SAN BERNARDINO. CALLER SAYS THAT THE BUS DRIVER WAS TALKING TO ANOTHER PASSENGER AND JOKED AROUND THAT HE WAS DRIVING A BUNCH OF "KIDS" MEANING HER AND HER CO WORKERS. CALLER IS UPSET BECAUSE SHE SAYS SHE MAY BE DISABLED BUT SHE IS NOT A "KID". CALLER SAYS THE BUS DRIVER WAS JOKING AROUND ABOUT IT AND IT WAS UNCALLED FOR. CALLER SAID SHE WANTED TO SAY SOMETHING TO THE BUS DRIVER BUT HE REMEMBERED THAT TWO TYPN MEET HE SHE EVER WAS A PERSON ABOUT TYPN THE INTERVIEW	Videotape viewed. Incident closed on 2/11/2013. Not considered broadbased Title VI service discrimination complaint.	
13374	1/23/2013	POMONA	91766	Telephone	DISABLED CALLER STATES THAT THIS OPERATOR (8873) IS A RACIST BECAUSE HE CHARGED HER. 60 CENTS TO RIDE THE BUS WITH HER DISABILITY CARD AND THAT OTHER OPERATORS LET HER RIDE FOR FREE. SHE THEN SAID SHE SAW HIM LET A HISPANIC PERSON RIDE FOR FREE.	Investigator's comment: "HE'S SUPPOSED TO CHARGE HER. 60 CENTS. IT SOUNDED LIKE SHE WAS ADDING RACISM CHARGES TO STRENGTHEN HER COMPLAINT. AMANDA ALSO GOT THIS CALLER WITH THE SAME COMPLAINT." Incident closed on 2/5/2013, attempted to mail postcard to complainant, customer correspondence returned as undeliverable. Not considered broadbased Title VI service discrimination complaint	COMMUNICATION: "HE'S SUPPOSED TO CHARGE HER. 60 CENTS. IT SOUNDED LIKE SHE WAS ADDING RACISM CHARGES TO STRENGTHEN HER COMPLAINT. AMANDA ALSO GOT THIS CALLER WITH THE SAME COMPLAINT."
13573	2/26/2013	SAN BERNARDINO	92404	Telephone	DISABLED CALLER STATES THAT THE OPERATOR WAS CARRYING ON A CONVERSATION WITH A OLDER NAVY VETERAN WHO KEPT CURSING THE "F" WORD THE "N" WORD AND SAYING "USELESS MEXICANS", ALSO RIDICULING YOUNG WOMEN WITH KIDS. SHE FURTHER STATES THAT THE DRIVER NEVER TOLD HIM TO STOP BUT IN FACT APPEARED TO BE ENCOURAGING HIM. SHE ALSO WORRIED THAT A FIGHT OR SOMETHING WOULD HAPPEN AS A RESULT OF HIS RACIAL SLURS	Incident closed on 3/12/2013; postcard mailed to complainant. Incident not considered broadbased Title VI service discrimination complaint.	
13605	3/2/2013	POMONA	91768	Telephone	CALLER STATES THAT HIS GRANDFATHER TRIED TO INTERPRET FOR A SPANISH SPEAKING WOMAN WHO WAS ACCUSED OF NOT PAYING HER CHILDREN'S FARE BUT WAS TOLD BY THE OPERATOR "YOU NEED TO SHUT UP AND MIND YOUR OWN BUSINESS. YOU ALREADY DON'T HAVE ANY TEETH YOU OLD" AND WAS READY TO SAY OLD MEXICAN MAN BUT BALKED PER CALLER AND THAT SHE MADE THEM GET OFF THE BUS.	Post card response mailed to complainant. Incident closed on 4/4/2013; not considered broadbased Title VI service discrimination complaint.	
13725	3/24/2013	CHINO	91710	Telephone	CUSTOMER IS IN A WHEELCHAIR HE WAS AT THE BUS STOP AND CO LET SOME PEOPLE ON AND DID NOT BOARD THE WHEELCHAIR, CUSTOMER STATES HES BEING DISCRIMINATED AGAINST	Video of incident not available for viewing. Post card contact with customer made, incident closed on 3/28/2013. Incident not considered to be a broadbased Title VI service discrimination complaint	
13863	4/12/2013			Telephone	CUSTOMER STATES CO SPEAKS TO CUSTOMERS VERY DISCRIMINATORILY HE ALWAYS REFERS TO CUSTOMER AS HER KIND (DISABLED OR RACE) CUSTOMER NOT SURE WHAT THE CO MEANS BY YOUR KIND OR HER KIND. CO ALWAYS SAYS HE CAN DO WHAT EVER HE WANTS AND SAY WHAT EVER HE WANTS VERY RUDE CO	4/12/2013 UNABLE TO SEND POSTCARD NO ADDRESS - ORC Video reviewed. Incident closed on 5/2/2013. Not considered to be a broadbased Title VI service discrimination complaint	COMMUNICATION: 4/12/2013 UNABLE TO SEND POSTCARD NO ADDRESS - ORC
13876	4/15/2013	FONTANA	92335	Telephone	CALLER STATES THAT OPERATOR #1556 ALWAYS ASKS TO SEE HER DISABLED I.D. WHICH IS EXPIRED. SHE THINKS HE JUST PICKS ON HER. THEN SHE STATES THAT A FEW STOPS AWAY AT ARROW/HAVEN HE ALLOWED A WHITE GIRL WITH SHORTS TO RIDE FREE AND THINKS THAT THIS IS RACISM. CALLER STATES THAT SHE IS BLACK.	Call Clerk told complainant that the driver has a right to ask her for an ID. Post card response mailed to complainant. Incident closed on 5/2/2013; not considered a broadbased Title VI service discrimination complaint.	COMMUNICATION: Call clerk informed complainant that the coach operator has a right to ask for her ID.

APPENDIX G: TRAPEZE COM RECORD OF LOGGED COMPLAINTS FROM MID-2012 TO 2015

Feedback Number	Date Received	City	Zip Code	Method Received	Description of Comment or Complaint	Outcome of Investigation	INTERNAL COMMUNICATION
13960	4/25/2013	RIVERSIDE	92503	Telephon	CALLER ASKED DRIVER IF HE CAN USE VICTOR VALLEY TRANSIT PASS AS A TRANSFER AND DRIVER SAID,NO NOT NO MORE. CALLER SAID OK AND PAID. NOW A BLACK MALE GETS ON TRIES THE SAME THING AND DRIVER SAID NO,BUT SHE WILL DO IT THIS TIME. CALLER SAID DRIVER WAS RACIST BACAUSE SHE WAS RI AKY AND WAS THAT BACKSINGR SHE LEFT ON FOR FREE. HE WAS VERY IMPST.	Post card communication mailed to complainant; incident closed on 4/9/2013. Incident not considered a broadbased Title VI service discrimination complaint.	
14029	5/8/2013	HIGHLAND	92346	Telephon	CALLER STATES THAT EMPLOYEE # 1782 LET HISPANICS ON THE BUS BEFORE TAKING HER BREAK BUT DIDN'T ALLOW HIM TO ENTER WHILE SHE WAS ON BREAK. IRATE CALLER THINKS THAT ITS BECAUSE HE IS BLACK AND THAT HE COULD HAVE HURT HER.	Post card communication mailed to the complainant, incident closed on 5/13/2013. Not considered to be a broadbased Title VI service discrimination complaint.	COMMUNICATION: HE (Complainant) SPOKE EARLIER TO ANOTHER OPERATOR AND TOLD HER THAT HE STEPPED OUT OF LINE TO RETRIEVE HIS LUGGAGE AND BY THE TIME HE RETURNED SHE HAD ALREADY STEPPED OFF OF THE BUS.
14264	6/12/2013	POMONA	91768	Telephon	DISABLED PASSENGER STATES THAT OPERATOR #2342 TOLD HIM TO REMOVE A RED POLE WITH A LIGHT ATTACHED TO HIS W/C (wheelchair) THAT HE HAS TO ALERT VEHICLES WHEN HE IS RIDING HIS W/C. HE STATES THAT HE FEELS THIS OPERATOR TARGETS W/C PASSENGERS BECAUSE OF THE TONE OF HIS VOICE.	Video reviewed; post card mailed to complainant. Incident closed on 7/2/2013. Not considered to be a broadbased Title VI service discrimination complaint.	
14486	7/20/2013	RIALTO	92376	Telephon	CALLER STATES THAT THE OPERATOR KEEPS TURNING THE A/C (air conditioning) ON AND OFF AND THAT THE BUS IS HOT. DISPATCHER STATES THAT SHE IS DOING THIS BECAUSE THE A/C IS VERY STRONG AND ALSO TO CONTROL THE TEMPERATURE. CALLER CONTINUES TO CALL AND COMPLAIN. HE NOW SAYS THAT THE OPERATOR CALLED HIM A WETBACK AND A BEANER AND TOLD HIM TO GO BACK TO HIS COUNTRY	Post card mailed to complainant after investigation. Incident closed on 8/21/2013. Not considered a broadbased Title VI service discrimination complaint.	
14491	7/23/2013			We-Tip	(Taken from WeTip crime report, case 585906): "Violation of company policy. This is to report an Omnitrans bus driver for bus 3, #0044. The driver refused to connect a scooter properly for a special needs passenger. The bus driver was rude and refused to help the gentleman. This incident happened between 1:45 and 1:50 PM. If you run the video, you will hear and see what happened. The bus driver told the passenger if he was going to behave that way, the next time I see you, you will not be on my bus. He threatened the passenger just because he wanted to be strapped in correctly."	Videotape of incident reviewed; it does not corroborate the complaint. Incident closed 8/5/2013. Not considered a broadbased Title VI service discrimination complaint.	
14573	8/5/2013	SAN BERNARDINO	92410	Telephon	DISABLED (WHITE) CALLER STATES THAT THE OPERATOR WOULDN'T ALLOW HER TO LOWER A DISABLED SEAT BECAUSE A HISPANIC WOMAN HAD HER OPEN STROLLER PARKED THERE. THE OPERATOR WAS HISPANIC AND SHE FEELS HE DISCRIMINATED AGAINST HER.	Post card mailed to complainant. Incident closed on 8/21/2013. Not considered to be a broadbased Title VI service discrimination complaint.	
14750	9/5/2013	DID NOT WISH TO DISCLOSE		Telephon	CUSTOMER STATES CO IS VERY RUDE, MEAN AND DEGRADING TO SENIORS OR DISABLED. CUSTOMER STATES THAT SHE IS AN ELDERLY AND OVERHEARD CO TELLING ANOTHER CUSTOMER THAT SHE WOULD HAVE NOT PICKED UP AN ELDERLY LADY IF IT WASN'T FOR THE OTHER PASSENGER THAT WAS WAITING WITH THE ELDERLY LADY. WHEN ELDERLY LADY GOT OFF CO STATED I SHOULDO OF PASSED UP THAT B@ UP. THAT IS NO WAY FOR CO TO BE CONSIDERING THEMSELVES	Attempted to contact by post card, but unsuccessful. Incident not yet closed as of 9/27/2013. Not considered to be a broadbased Title VI service discrimination complaint.	COMMUNICATION: 9/5/2013 UNABLE TO SEND POSTCARD - ORC
14805	9/12/2013	LOMA LINDA	92354	Telephon	DISABLED CALLER STATES THAT BECAUSE HE IS WHITE THE DRIVER ASKED HIM TO REMOVE HIS BELONGINGS FROM HIS BUGGY BEFORE ENTERING THE BUS. HE STATES THAT NO WHITE OR HISPANIC OPERATORS ASK HIM TO DO THIS. HE IS UPSET ALSO BECAUSE HE STATES THAT HE WAS GOING TO CARRY HIS ITEMS INTO THE BUS BUT THAT THE OPERATOR TOOK OFF	Post card mailed to complainant. Incident not yet closed as of 9/27/2013. Not considered to be a broadbased Title VI service discrimination complaint.	
15164	11/12/2013	REDLANDS	62374	Telephon	COACH OPERATOR WAS ONLY ASKING WHITE PEOPLE, USING A MONTHLY PASS, FOR THEIR ID. BLACK PEOPLE USING MONTHLY PASSES WHERE NOT ASKED TO SHOW ANY ID AT ALL. CUTOMERS FELT COACH OPERATOR WAS BEING RACIST AND UNFAIR.	This is not a valid complaint against operator Boothe. When I viewed the video I never witness the statement that was indicated. Operator Boothe asked everyone that I saw for their ID. (Lisa Chance, Investigator). Does not constitute a Title VI discrimination situation	None
15177	11/14/2013	REDLANDS	92373	Telephon	CUSTOMER WAS BOARDING THE ROUTE 39 HE IS AN ELDERLY GENTLEMAN, STATED CO MUST OF BEEN IN A BAD MOOD, CUSTOMER WAS TAKING HIS TIME TAKING OUT HIS MONEY OUT OF HIS POCKETS. CO STARTED TELLING CUSTOMER THAT HE DID NOT PAY HIS WHOLE FARE, CUSTOMER STATED HE HAD MORE CHANGE IN HIS POCKET FOR CO TO WAIT A MINUTE. CUSTOMER PAID FARE CO HARRASSED CUSTOMER ABOUT AGE, HIS 63. VERY RUDE CUSTOMER FELT DISCRIMANATED AGAINST HE IS WHITE. CO DID THIS TO EVERY WHITE PERSON THAT BOARDED. CUSTOMER WOULD LIKE A COPY OF THIS COMPLAINT.	I viewed video of this incident from coach 0152 and continued to watch another 10 minutes of Operator Boothe as she boarded other passengers. The gentleman at Redlands Mall put money into the fare box. The fare box showed a shortage of fare. Operator Boothe challenged the passenger for full fare and also for an ID for discounted fare. This is proper procedure. Also at this stop, an African American(male) boarded with a discounted pass. Operator Boothe challenged this passenger for his ADA ID, he complied. AT the next stop, An elderly white woman boards with a discounted pass. Operator Boothe ask for ID; she complies. A few stops later, Operator Boothe challenges an hispanic for male for his ID. Complaint is not valid. (Investigator Harold Jones) Not a valid Title VI discrimination complaint.	None
15232	11/24/2013			Telephon	Asking for title 5 of the ca code for ADA? Calling and complaining that this driver Alice blew smoke in their faces. Claiming they feel discriminated by their disability and race.	Video query and video playback systems were utilized to complete this investigation. The results determined Coach Operator Alice Browning as the operator of coach # 1227 Route 2, Run 4. The video was INOP for the time stated in the complaint. The discovery of the video indicated "NOT FOUND." The complaint CANNOT be determined valid or invalid at this time. The operator will be spoken with regarding the incident. Please inform the passenger that the video system was unable to be retrieved. We apologize that we were unable to verify the validity of the complaint.	Please inform the passenger that the video system was unable to be retrieved. We apologize that we were unable to verify the validity of the complaint.
15234	11/25/2013	SAN BERNARDINO	92404	Telephon	CALLER WHO STATES THAT SHE IS BLACK SAID THAT THIS OPERATOR ACCUSED HER OF HAVING HER HEADPHONES TOO LOUD AND THAT IF SHE DIDN'T TURN IT DOWN SHE WOULD HAVE TO GET OFF THE BUS. SHE STATES THAT THERE WERE OTHER PASSENGERS (NON-BLACK) WHO WERE ALSO HEARING THEIR HEAD PHONES LOUDER THAN HER. FURTHER STATES THAT THE OPERATOR MIGHT BE HAVING A BAD DAY	Incident closed 12/12/2013. This did not appear to constitute a Title VI discrimination situation.	
15236	11/25/2013	ONTARIO	91764	Telephon	FEMALE CALLER STATES THAT THIS PARTICULAR DRIVER ALWAYS PASSES HER BECAUSE SHE DIDN'T GIVE IN TO HIS ROMANTIC ADVANCES. SHE ALSO CLAIMS RACISM,YET SHE STATES THAT SHE IS HALF WHITE AND HALF MEXICAN WITH A VERY STRONG HISPANIC ACCENT. SHE STATES THAT THIS CAUSES HER TO MISS HER CONNECTING BUS.	Video viewed in field; Incident does not appear to constitute a Title VI discrimination situation. Investigator's notes: I viewed the video for this complaint in the field. #1263, Opr Calderon stopped at passenger zone #7600 WB Foothill/Etiwanda at 1610 on 11/25/13 To let a passenger off. There was no one waiting at the bus stop or the surrounding area. I have attached a snapshot of the scene.The CO has no idea what this is about. He has had no interaction with any passenger to cause these things to be said about him.	
15341	12/20/2013	San Bernardino	92404	Telephon	Caller felt the driver was being racist with the hispanic passangers. When speaking spanish he asks people to get off phones and when ladies are having a conversation he tells them to be quiet. But when other races are speaking he doesn't tell them anything.	NOT VALID....No pass up, no discrimination. Incident closed 1/2/2014. Incident is not a Title VI discrimination case.	
15355	12/27/2013	UPLAND	91786	Website	At 10:14 am, on 8th and mountain in the city of Upland bus driver 551 of route 67 heading towards the Montclair transit center verbally assaulted myself, my fiancé and my 13 year old sister. My fiancé paid his fare, moved to the side to assist my 13 year old sister since she had never ridden a bus or inserted fare. The bus driver said "don't you dare stand over me and take a seat." We thought it was rude, uncalled for and down right unnecessary. Once our ride was coming to a conclusion, we pushed to stop and prepared ourselves to get off at our stop. As we were standing the bus driver screamed at us "I'M NOT THERE YET!". We all looked perplexed, as we didn't understand why he was responding to us in that manner. We got on the bus, rode it and got off in silence. We weren't problematic nor did we bring attention to ourselves. The only thing that could've been an issue is that we were an interracial couple, as he didn't treat ANY of the other passengers in the manner that he had us. It was a disturbing situation that seemed to be brought about by nothing of which we had done. I would like for this situation to be taken seriously by your company, as I have emailed my detailed story to a friend of mine who is a journalist for the Daily Bulletin. We are all prepared on our side to follow this through, as we take racism and prejudice VERY seriously. If I do not receive a timely response from your end, that information will be forwarded to the Daily Bulletin as well.	Video viewed. From Investigator's notes: All the information listed in this CSR fit coach 507,r167,run2,OprS.Stoll, and he was at the location,date,time,and direction of travel listed. I reviewed video from his bus. Post card mailed to complainant; text read: Thank you for contacting Omnitrans Ms. Harvey. Your concerns have been documented and forwarded to our operations department for investigation by an operations field supervisor. We've also flagged your complaint as noted below as "racism". Please know that Omnitrans prohibits discrimination on the basis of race, color and national origin from any and all employees. Your comments have been taken seriously and a full investigation and proper corrective action will be taken by the investigating field supervisor. If you have any questions regarding your complaint, your reference number is 15355.	
15363	12/31/2013	UPLAND	91786	Telephon	COACH OPERATOR STOPPED AT BUS STOP, LOOKED AT CUSTOMER RIGHT IN THE EYES, AND DIDNT OPEN DOORS, CUSTOMER KNOCKED ON THE DOORS, BUT COACH OPERATOR STARTED TO TAKE OFF, AND REFUSED SERVICE. CUSTOMER THINKS IT MIGHT HAVE HAD SOMETHING TO DO WITH HIS RACE. COACH OPERATOR DID NOT GIVE ANY REASON AND BUS WAS NOT FULL.	Thank you for bringing this matter to our attention and allowing us the opportunity to address your concerns. (Situation did not appear to constitute a Title VI discrimination situation.)	
					From Investigators notes: I viewed the video for this complaint. Opr Brundage was stopped at this stop for a full five seconds. Both the men at this zone had their backs towards the bus. Neither one of them turned to face the bus when it was stopped at the zone. In fact, one of them was moving in the opposite direction. They gave no indication they where interested in the bus. The CO continued on. There is nothing to indicate discrimination. NOT VALID. Complaint not Title VI discrimination. Incident closed 3/12/2014.		

APPENDIX G: TRAPEZE COM RECORD OF LOGGED COMPLAINTS FROM MID-2012 TO 2015

Feedback Number	Date Received	City	Zip Code	Method Received	Description of Comment or Complaint	Outcome of Investigation	INTERNAL COMMUNICATION
15420	1/8/2014	SAN BERNARDINO	92401	Telephone	COACH OPERATOR MADE CUSTOMER THROW HIS DRINK AWAY BEFORE BOARDING THE BUS, WHICH WAS OK WITH CUSTOMER. BUT THEN 15 MINUTES LATER, COACH OPERATOR LET SEVERAL CUSTOMERS WHO WERE BLACK, BOARD THE BUS WITH DRINKS AND EATING PIZZA OUT OF THE BOX. EVEN A CHILD WAS ALLOWED TO BRING HIS DRINK IN. CUSTOMER FEELS HE WAS DISCRIMINATED AGAINST BECAUSE HE IS WHITE.	Video reviewed. Commentary: Review of the video for this incident shows Operator Lofton telling a man who boards the coach with what appears to be an open energy drink can that he is not allowed to board with the drink. The man complies and throws the drink away and reenters the coach. A while later a family of four (2 adults and 2 children) boards the coach with a folded stroller, a pizza box, and three drinks in plastic cups with lids and straws. The camera's view of them after they take their seats is somewhat blocked by other people around them and the sun shining in the window, and it was likely that Operator Lofton's view of them was also blocked in the same manner. However, it does not appear that they actually ate any pizza or drank on the coach. Operator Lofton was following procedure by not allowing an open beverage container on vehicle. Incident closed 3/12/2014. Incident does not constitute Title VI discrimination.	
15537	1/27/2014	E. RANCHO DOMINGUEZ	90221	Telephone	CALLER STATES THAT THIS OPERATOR #2833 REFUSED TO GIVE HIM A COURTESY RIDE DESPITE HAVING A METROLINK PASS AND WAS HEADING BACK TO THE METROLINK. CALLER FURTHER STATES THAT HE THINKS THE DRIVER IS A RACIST AS HE ALLOWS BLACK FAMILIES TO BOARD UNDER THE SAME CIRCUMSTANCES.	Incident closed 3/12/2014. Incident does not constitute Title VI violation. Omnitrans does not give courtesy rides to Metrolink pass holders like this.	
15574	2/2/2014	FONTANA	92336	Website	This is a complaint on Employee #2855 route 61 that leaves at 2 pm on Saturday 02/01/2014. I am Mexican- American. I got on the bus at the bus stop headed to Fontana Metro-link on Vine and Holt Blvd.I understand that I always have to be prepared and ready with my bus pass, I always am, just since I was running to the bus it was just floating in my purse. (BUT I AM 100% sure that I had it) I had asked the driver poltly if he can just give me one second to get it out. His response was "Sure, You can look for it while the next bus comes." Me working in the medical field I always receive smart comments and I tend to ignore them, so I did. Not even 20 seconds later I gave him my pass. Later on Vineyard and Holt a White American family stepped in. One of the ladys had said out loud she needs 50 cents to get in. You know what the driver said to her. Go ahead and have a seat. He even gave them time to look for there stuff. To me I found that very racist. Why didnt he tell them "Sure, You can look for change while the other bus comes." I always ride the bus since my car got taken away I have never felt more offended and upset. EVER.	Incident closed 03/12/2014. Customer contacted with postcard. Incident does not constitute Title VI violation.	
15710	2/22/2014	RIALTO	92376	Telephone	COACH OPERATOR DOES NOT WANT TO PICK UP CUSTOMER DUE TO HIS PSORIASIS ON HANDS. CO ALWAYS TELLS CUSTOMER THERE IS NO ROOM ON THE BUS FOR HIM, TELLS CUSTOMER TO TAKE THE NEXT BUS. CUSTOMER STATES THERE WAS NO PEOPLE IN THE DISABLED SEATS, CO IS DISCRIMINATING AGAINST HIM. NOT THE FIRST TIME THIS CO DOES THIS TO CUSTOMER.	Recommended as a valid complaint against operator. Video viewed, investigator's notes: I watched the video of this incident on coach 0122. Video verified that a wheel chair passenger was ignored and not allowed to board coach 122 at the Fontana Metro link.(route 14 run 6). When I confronted Operator Nash with the complaint, she did not want to view the video or read the complaint. She ask that the report be forwarded to ATM Mike DiFonzo. Complaint is valid. Appropriate action taken. Incident closed 3/12/2014. Incident not a valid Broad-based Title VI complaint.	
15974	4/15/2014	BANNING	92220	Telephone	CUSTOMER WAS BOARDING THE BUS THE CO ASKED CUSTOMER TO MOVE TO THE BACK OF THE BUS. CO DID NOT WANT CUSTOMER STANDING BEHIND HIM. CUSTOMER FELT LIKE CO WAS DISCRIMINATING AGAINST HIM. OTHER PEOPLE WERE STANDING BEHIND CO AFTER CUSTOMER WENT TO THE BACK.	Video reviewed. Investigator's notes: The man making this complaint was agitated before he entered the coach because of an argument he was having with a security guard outside. C/O Stine tells him to "calm down" if he wants to ride the bus which only agitates the individual more. C/O Stine says, "I'm just warning you now." The man becomes even more agitated and shows Oper. Stine a paper and makes reference to the state Governor. Oper Stine tells him to "pay his fare" the man then runs his bus pass through the fare box. Oper. Stine then tells the man he does not want him standing behind him & to move toward the rear of the coach. The man complies & moves to the rear. Another young couple board the coach & stand in the same area the man was previously standing in & Oper. Stine does not ask them to move. Under the circumstances Oper. Stine was not wrong for asking the man not to stand behind him. The man was already agitated & became more so as they continued to speak to each other. Oper. Stine could have chosen his words better when dealing with this man from the beginning & will be counseled for that, but there was really no policy violation during this incident. This complaint is invalid. Not a Title VI violation.	
15980	4/16/2014	SAN BERNARDINO	92405	Telephone	TEXT 1: From N Ortiz: I am on the number 14 going to downtown san bernardino it is april 16 2014 at 859am bus number inside is 1222..my complaint is someone was playing music and the driver she accused me of me having music on not only that but she called me a sir. Mind you i didnt have no music on i jad my phone out because i was doing homework on my phone. I feel she is homophobic and i dont think she is fit for the job if she cant get along or accept people with different perceptrives in life. If no action is taken i would be glad to file a harassment case and unfair treatment case. Everyone needs to be treated fair especially when you are working with the public. TEXT 2: On Apr 16, 2014 9:46 AM, "Olga Ramirez" <Olga.Ramirez@omnitrans.org> wrote: Good Morning N Ortiz. Thank you for your feedback regarding our Omnitrans service. In order for us to investigate this incident further we need more information from you. Where did you catch the bus, cross streets? We understand you caught the route 14 at 8:59 a.m. going to Downtown San Bernardino. This information will help us take appropriate action. Thank you for riding Omnitrans. OLGA RAMIREZ-CORTES, INFORMATION CLERK TEXT 3: From N Ortiz: Actually i believe this falls under discrimination act in a job environment and treated unfair.	TM Playback, Video queried, Route Headways used for investigation. Customer states that, she was on the bus (Route 14) April 16, 2014 when someone was playing music and CO accused her of playing the music, and also called her a sir. She plans to file a harassment and unfair treatment case if no action is taken. Video for this incident was not found, but will talk to CO about it to get more details. Will forward findings to CS Dpt. I cannot make a decision on this incident due to lack of video. After talking to CO Thompson about this incident, which she does not recall, she stated that, "She would never refer to anybody as Sir." She simply speaks in general terms. For example: Attention everybody, please turn the volume down on your device. Recommendation: refer to ATM. Not a Title VI incident.	
16119	5/12/2014			Letter	Former Employee of the IPMO team which designed sbX project did not have her current ID badge with her, asked if she could ride the bus (which she always does); coach operator called dispatch number to confirm, and informed her to: "Get off the bus, you can catch the next bus." Customer believes the coach operator has poor customer service skills and needs to be re-instructed in these. Customer, who is black, feels very strongly that her civil rights were violated by the coach operator, who was hispanic.	Investigation remains ongoing. Does not appear to be Title VI violation.	
16466	7/14/2014	COLTON	92324	Telephone	CALLER STATES THAT THIS OPERATOR DICRIMINATED AGAINST HER DISABLED SON. CALLER STATES THAT THE OPERATOR WOULDN'T TRANSPORT HER SON UNLESS HE WAS IN HIS W/C EVEN THOUGH HE WAS NOT IN THE W/C WHEN SHE PULLED UP. THEY HAD IT FOLDED BECAUSE HE DIDN'T NEED IT AND THAT THERE WERE ALREADY 2 W/C'S ON THE BUS AND HE WOULDN'T BE ABLE TO RIDE IF HE WAS IN HIS W/C. CALLER WANTS A CALL BACK.	Incident investigated and closed 7/21/2014. Not a Title VI incident.	

APPENDIX G: TRAPEZE COM RECORD OF LOGGED COMPLAINTS FROM MID-2012 TO 2015

Feedback Number	Date Received	City	Zip Code	Method Received	Description of Comment or Complaint	Outcome of Investigation	INTERNAL COMMUNICATION
16536	7/29/2014	SAN BERNARDINO	92404	Telephon	CUSTOMER WAS BEING HARRASSED AND INTIMIDATED BY OTHER CUSTOMERS. ONE CUSTOMER KICKED HER CART AND DAMAGED CART, ANOTHER CUSTOMER WAS TELLING HER TO MOVE WITH HER CART SOMEWHERE ELSE. CO JUST SAW THIS HAPPENING AND DID NOT DO ANYTHING. CO INSTEAD THREW CUSTOMER OFF THE BUS. CUSTOMER FELT DISCRIMINATED AGAINST BECAUSE SHE'S HOMELESS. CO ALWAYS GIVES CUSTOMER A HARD TIME WHEN SHE GETS ON THE BUS	No video was available for this incident. Operator Lee explained that this is a frequent passenger who boards her bus with a large cart and on this day sat down in the disabled seating area. As Operator Lee was boarding a wheelchair passenger the lady stood up and refused to move her cart out of the way after repeated requests so the wheelchair passenger could turn around in the aisle. Operator Lee ended up going over and moving the cart so the wheelchair passenger could turn herself around and be secured in the proper area. Another passenger spoke up to the lady with the cart and stated that it would have been easier if she had just moved her cart to begin with. The lady with the cart and this woman began arguing about the matter. Operator Lee told them both they would have to settle down. Not a valid Title VI complaint.	
16632	8/12/2014	RANCHO CUCAMONGA	91739	Telephon	MS. SPEARS WITNESSED CO DIDN'T WAIT FOR PASSENGER WHO WAS RUNNING TO CATCH THE BUS. SHE BELIEVES THIS WAS DUE TO DISCRIMINATION.	Investigation ongoing; does not appear to be a valid Title VI complaint.	
16873	9/21/2014	SAN BERNARDINO	92407	Telephon	CUSTOMER STATES THE DRIVER BLOCKS THE SPANISH RECORDING SHE STATES SHE SAW THE DRIVER DOING SOMETHING SO THAT THE SPANISH RECORDING DOESN'T PLAY SHE ALSO STATES THE DRIVER SEEMS LIKE HE HAS SOMETHING AGAINST MEXICANS	Video viewed. Investigator's comments: his is not a valid complaint for the statement made against Operator Patton. When I viewed the video I could hear the announcement with both English and Spanish going off. I never saw him being rude to anyone for the 30 minutes indicated for the time and place on the complaint. Complaint not valid. Not a Title VI complaint. Incident closed 1/20/2015.	
16910	9/26/2014	REDLANDS	92354	Telephon	DISABLED VETERAN STATES THAT SHE HAD A PREVIOUS PROBLEM WITH THIS DRIVER CONCERNING HIS BRAKING HARD AT STOPS AND HE APPEARS TO BE HOLDING A GRUDGE AGAINST HER. WHEN SHE TRIED TO BOARD HIS BUS TODAY HE TOLD HER "OH NO YOUR NOT RIDING MY BUS, I DON'T LIKE THE WAY YOU TALKED TO ME." CALLER STATES THAT SHE HAS A BAD BACK SHE SUFFERED IN THE ARMY AND THINKS THAT THIS OPERATOR IS DISCRIMINATING AGAINST THE DISABLED AND THREATENS TO TAKE THIS TO HER COMMANDER.	Situation discussed with coach operator. Investigator's notes: I discussed this incident with Operator Castillo. He stated that the previous problem with this passenger has been resolved and he will continue transporting this individual. He stated that he did not report this passengers past aggression towards him because he felt that he could handle this himself since she is one of his regular passengers. Incident resolved; determined not to constitute a Title VI violation.	
16925	9/29/2014	SAN BERNARDINO	92405	Telephon	CALLER STATES THAT THIS OPERATOR DISCRIMINATED AGAINST HIM BECAUSE HIS BODY ODOR WAS BAD. HE STATES THAT SHE MADE HIM EXIT THE BUS BECAUSE OF HIS ODOR. CALLER STATES THAT HE DOESN'T SMELL BUT HE WAS IN THE OMNI OFFICE EARLIER AND AN EMPLOYEE (SUE) VOUCHED FOR THE DRIVER STATING THAT HE DID IN FACT HAVE A FOUL ODOR OF URINE.	Contacted customer to determine what route, day, and time alleged incident occurred. Video Queried, Route Heavys and TM Playback used for investigation. Customer states he was discriminated against by the CO at Highland and "E" Streets (Route 2 Northbound at 1205 hrs. on 09-29-14) After viewing the video of this incident, I DO NOT see such incident happening at this location. I checked the time and location heading Northbound and then I checked the bus heading Southbound, but, I still DID NOT find such incident taking place at this time and this location. I cannot make a decision on this investigation due to lack of proper information. All information provided does not match with time and location. Incident does not constitute a Title VI violation.	
17201	11/5/2014			Telephon	Customer claimed: She had been waiting for the bus, and a problem with NexTrip caused her to run to catch up with vehicle. When she got on the vehicle, she noticed she only had three \$20.00 bills. She rooted around in her purse to find change, but the coach operator became very rude, and demanded that she leave the coach. Coach operator became abusive and went so far as to use radio to call dispatch. Customer was very intimidated and felt discriminated against. Had to leave bus and get ride from her husband. She believes the coach operator was discriminatory to African Americans and Hispanics, and will not put up with this behavior any longer.	I observe no discrimination present here. This is an incident with a repeat fare evader. She has money just not the right denominations. She tries to get change from other passengers. She is blatantly ignoring the COs request to stop asking for change for her \$20. Someone else finally paid her fare for her. She is also refusing to leave the bus when the CO has told her to do so. She is also delaying the route. I am validating this for rude behavior only & not referred it for discipline. Incident does not constitute a Title VI violation. Incident closed on 11/20/2014.	
17337	11/28/2014	COLTON	92432	Telephon	CALLER STATES THAT AS SHE WAS HAVING A CIGARETTE BREAK OUTSIDE OF HER JOB BY THE BUS STOP THIS OPERATOR APPROACHED AND SAID "OH YOU DIDN'T CALL ON ME, CAUSE I DON'T GIVE A F_CK". CALLER STATES THAT THIS OPERATOR WAS APPROACHING HER LIKE IF SHE WANTED TO INTIMIDATE HER AND THINKS THAT SHE WAS BEING PREJUDICE BECAUSE SHE IS WHITE AND THE OPERATOR IS BLACK.	No video of incident available. Incident closed on 1/23/2015. Not considered a valid Title VI violation.	
17455	12/19/2014	HIGHLAND	92346	Telephon	CALLER STATES THAT HE TRIED TO BOARD THE BUS WITH A FLAT TIRE HE WAS TAKING TO GET REPAIRED BUT HE WAS REFUSED SERVICE BY THE OPERATOR. HE STATES THAT THERE WAS A BLACK PASSENGER IN THE BUS WITH A BAG FULL OF CANS THAT SMELLED STRONGLY OF ALCOHOL AND WONDERS WHY HE WAS ALLOWED ON THE BOSS. HE STATES THAT HE IS WHITE AND THAT THE OPERATOR IS BLACK AND THAT IT MAY BE RACIALLY MOTIVATED.	Video viewed; investigator comments: I'm unable to verify this complaint. When I view the video for the place, date and time stated, I never saw the incident happen. Please check with the man to see if all the information was correct to verify this complaint. I will talk to the operator to make sure he is aware that we should be letting him ride with a tire. Not a valid Title VI complaint.	
17519	1/9/2015	POMONA	91767	Telephon	CUSTOMER STATES SHE WAS ON BOARD THE BUS EATING A BAG OF CHIPS DRIVER CAME BACK TO THE BUS AND TOLD HER THERE'S NO EATING OR DRINKING ON THE BUS SHE SAID OK I'LL PUT THEM AWAY CUSTOMER STATES SHE SAW A MEXICAN MAN WITH A CUP OF COFFEE AND SAT ALL THE WAY TO THE BACK OF THE BUS PASSENGER WAS DRINKING HIS COFFEE AND DRIVER DIDN'T SAY ANYTHING TO HIM THEN SHE STATES A LADY CAME IN WITH A BOTTLE WATER AND SHE WAS DRINKING HER WATER ON THE BUS AND DRIVER DIDN'T SAY ANYTHING TO HER CUSTOMER FEELS SHE WAS DISCRIMINATED FOR BEING BLACK SINCE THE OTHER PASSENGERS WERE MEXICANS LIKE THE DRIVER THATS WHY DRIVER DIDN'T SAY ANYTHING TO THEM SHE FEELS THAT IF DRIVER IS GOING TO FOLLOW THE RULES IT SHOULD BE FOR EVERYONE.	Video viewed. Investigator's comments: All the information for this investigation was obtained through TM play back, headways and viewing video. This is not a valid complaint Video showed that the operator did state to this passenger that there was no eating on the coach, but he did not witness any other passengers eating or drinking. There was one passenger that was sitting to the right of the Operator in the wheelchair area closest to the front door that took one sip of bottled water with a cap, but the Operator was paying attention to the traffic when this occurred not looking to his right. I have included photos to show what the driver was doing as she sipped her water. Not a valid Title VI violation. Incident closed on 1/21/2015.	
17729	2/16/2015	CLAREMONT	91711	Telephon	CALLER STATES THAT OPERATOR #1698 BECAME IRATE WHEN SHE ACCIDENTLY CROSSED THE YELLOW LINE AND YELLED AT HER FOR 5 MINUTES. SHE STATES THAT HE WAS RUDE, AGGRESSIVE, ALMOST PSYCHO AND SHE FELT DISCRIMINATED AGAINST AS THIS DRIVER WAS VERY NICE TO BLACK PASSENGERS. SHE FURTHER STATES THAT HE WAS TALKING A FEMALE PASSENGER WHO WAS TALKING WITH HIM.	Incident not considered to be a Title VI Violation. Incident closed on 4/8/2015.	
17752	2/20/2015	RANCHO CUCAMONGA	91730	Telephon	CUSTOMER REPORTS THAT SHE WAS ASKED TO SEE HER ID BY COACH OPERATOR AFTER SHE SLID IT. SHE SHOWED HER ID CARD BUT DIDN'T QUITE UNDERSTAND WHY HE ASKED. SHE OBSERVED THIS CO ALLOWING A WHITE CUSTOMER TO GET ON WITHOUT SHOWING ID AT A LATER STOP. SHE ALSO OBSERVED THIS SOC BOARDING STUDENTS AT ASPEN/FOOTHILL AND HE ASKED ALL OF THEM TO SEE ID (THEY WERE BLACK). WHEN HE GOT TO HAVEN A WHITE CUSTOMER BOARDED AND HE DID NOT ASK TO SEE HIS ID. AN ELDERLY BLACK MAN BOARDED AND HE ASKED HIM FOR ID. BEHAVIOR IS DISCRIMINATORY AND INAPPROPRIATE MUST BE ADDRESSED. CUSTOMER BOARDED AGAIN AT FOOTHILL/ASPEN GOING THE OPPOSITE DIRECTION AT 1237 AND HE ASKED TO SEE HER ID AGAIN. CUSTOMER STATES THIS MAN'S ATTITUDE IS DISCRIMINATORY AND CAN'T BELIEVE IT'S HAPPENING. NOTED THIS IS JIM CROW TREATMENT.	No opportunity to view video (overwritten). Investigator's comments: Checking ID is at the driver's discretion. Opr Peterson told me if he knows he has already seen a regular S/D pass, youth pass or GOsmart Student ID he will not ask them again. He looks at the picture on GOsmart student ID's that ride free to verify it is that student. He checks ID for youth passes to verify they are less than 19 years old. He said if he checks more than one person at a time of the same ethnicity is purely coincidental. He does not check anyone's ID paying full fare. Opr Paterson denies any discrimination his part. Please see the attached page. NOT VALID. Incident closed on 4/8/2015. Incident not considered a valid Title VI violation.	

APPENDIX G: TRAPEZE COM RECORD OF LOGGED COMPLAINTS FROM MID-2012 TO 2015

Feedback Number	Date Received	City	Zip Code	Method Received	Description of Comment or Complaint	Outcome of Investigation	INTERNAL COMMUNICATION
17867	3/11/2015	LOS ANGELES	90020	Telephon	CUSTOMER WAS WITH A WHEELCHAIR CUSTOMER, CUSTOMER TRIED TO GET ON WITH WHEELCHAIR CUSTOMER, CO TOLD HIM TO WAIT, CUSTOMER WAS TRYING TO TELL CO THE SITUATION CO WOULD NOT HEAR IT. CUSTOMER FELT CO WAS DISCRIMINATING AGAINST HIM BY CALLING HIM A BOY	Video was reviewed. Investigator comments: The information I gathered for this investigation through TM play back, headways, and viewing video. Lead me to Operator James Castro, he was operating the route #1 run #1 on 03/11/15 coach #0188. According to the video viewed, this Operator was not being rude to this customer it was the other way around. The operator simply asked this passenger not to board the coach until he loads a wheel chair onto the bus. I'm assuming that the reason for that request was because he was not in the drivers seat, and was not able to verify the passenger fare, he The passenger was the one that began to get load stating that he was from L.A. and used a few curse words when talking to the operator while threatening his job. He told the driver to get the F--- out of his way. There were no comments needed from the operator, the video showed that the operator did nothing wrong, but try to do his job. Please let the caller know that he can not come aboard the coach and speak to the operators in the manner that he did with this operator. We have the right to refuse such passengers service from riding our buses. The Operators should not have to be subject to such verbal abuse. Further more I did not here the operator call this passenger a BOY, that must have been an added ingredient to this complaint. The passenger was not being discriminated against that is not a true statement. Incident closed 4/8/2015. Not a Title VI violation.	
17902	3/16/2015	FONTANA ML	92337	Telephon	MOTHER CALLED AND SAID BUS DRIVER DID NOT LET HER SON ON BOARD THE BUS. MOM SAID SON SHOWED HIS DISABLED CARD AND IS DEAF AND DRIVER DID NOT LET HIM ON. MOM IS VERY FURIOUS AND WANTS THIS TO BE A CIVIL RIGHTS CASE.	Video viewed, does show incident. Investigator's comments: I have viewed the video for this incident. It is my observation the CO was doing as instructed. He was asking to see some kind of ID, as outlined in our bus book, verifying eligibility for a reduced fare pass. The passenger did not produce a proper ID. The CO told him he could not use the pass without proper ID. The passenger left the bus of his own volition. He returned a few moments later holding a phone up to the driver. Opr Day reiterated, towards the phone, that proper ID was needed to use the senior/disabled pass. The passenger then left the bus again. The passenger was never asked to leave the bus. NOT VALID. Incident closed 3/25/2015. Not a valid Title VI complaint.	
17962	3/26/2015			Website	Complaint from passenger: "Yesterday, 3/25/15, I and my son were on board your bus #80 outbound from the Montclair transit center driven by employee id#3138 which departed from the station at 4:33 p.m. The driver was a total racist and would not give us service. He was black and we are white. He made our trip horrible and would not help to let us know when we reached our destination. You must fire this driver!"	Incident still under investigation.	

APPENDIX-H COMPILATION OF SERVICE AND FARE EQUITY ANALYSES

The compilation of Service and Fare Equity Analyses begins on the following page.

APPENDIX H

This appendix is a compilation of the Service and Fare Equity Analyses completed during the review period and adopted by Omnitrans' Board of Directors. Each Service or Fare Equity Analysis appears in its own dedicated sub-appendix. These are indicated in the following table.

MAJOR CHANGE	Approval Date	Implementation Date	Equity Analysis Completed	Sub-appendix
1. Fare Change	May, 2013	September 2, 2013	Yes	H-1
2. Service Change (sbX begins)	November, 2013	April 28, 2014	Yes	H-2
3. OmniConnects' Fare Change; East Valley Service Changes	May, 2014	September 2, 2014	Yes	H-3
4. Veterans' Fare Discount	October, 2014	January 5, 2015	Yes	H-4
5. West Valley Service Changes; Route 290 introduced; SBTC opens. (PROPOSED)	May, 2015	September 7, 2015 (PROPOSED)	Yes	H-5

Note that any references to exhibits within the original documents are drawn from those documents and are self-consistent.

Fare Change Analysis, implemented on September 2, 2013.

Fare Equity Analysis of May 2013 Proposed Fare Policy Changes

Description of Changes for May 2013

Three changes to Fare Policy are proposed for May of 2013. These primarily involve changes in language to three programs, which will tighten up the respective policies so as to reduce ambiguity regarding who can use them. The three programs are: 1. the Go Smart program (a negotiated fare for students at participating partner schools); 2. the Student pass program (ambiguous policy language will be changed or removed, and student passes will now become Youth Passes); and 3. the ADA / Access Subscription program (in which fares will be lowered to equal the same amount as cash fare).

1. Go Smart Program

The Go Smart Program is a program which currently uses pre-negotiated fares for all students at a partner school and which permits any student at that school to ride free. The fare is designed to be revenue-neutral. Either the student body votes to approve becoming a partner school in the program and having a portion of their student fees directed to pay for these fares, or the school chooses to pay for their students. At present, it is estimated that this averages out to fifteen dollars per student per academic year at partner schools.

Five schools in our service area (seven campuses in total) have become partner schools and participate in the Go Smart program at this time.

In essence, the change in language to this program will expand who can use the program at partner schools to include workers at such schools as well as students. It will further refine which schools are eligible. The language will change to read that the Go Smart fare is a pre-negotiated fare for all riders who attend a partner University, College, Trade/Technical School, or High School, *or who work at a partner employer.*

ANALYSIS

All schools in Omnitrans' service area which meet the criteria for the Go Smart program are eligible for Go Smart, as long as either their student body votes to approve payment for it or the school itself pays for it. As such, the onus is upon the

school or its student body to approve such a program, and schools which are not partners will have opted out by their own volition.

Demographic data for the student body at all schools enrolled in the Go Smart program is not immediately forthcoming. Instead, a demographic review of the regions immediately surrounding each partner school which may be from where many of the student body are drawn indicated the following demographic characteristics:

		For the community within one-half-mile of campus					
	NAME OF SCHOOL Funding Go Smart Program	TOTAL POPULATION	Low-Income Whites	Minorities	L.I.M.	Percentage Minority	Percentage LIM
1	Art Institute of California, Inland Empire	601	10	546	556	90.8%	92.5%
2	Chaffey College: Chino Campus	2,016	11	1,501	1,512	74.5%	75.0%
3	Chaffey College: Fontana Campus	9,451	121	8,516	8,637	90.1%	91.4%
4	Chaffey College: Rancho Cucamonga Campus	3,630	55	1,943	1,998	53.5%	55.0%
5	Valley College (San Bernardino Valley College)	5,388	79	5,039	5,118	93.5%	95.0%
6	Crafton Hills College	46	2	18	20	39.1%	43.5%
7	Academy of the Inland Empire (Free Charter School)	4,185	81	3,932	4,013	94.0%	95.9%
	STRAIGHT SUM	25,317	359	21,495	21,854	84.9%	86.3%
	TOTAL	24,331	469	20,621	21,090	84.8%	86.7%

The largest school in Omnitrans' service area which chose to opt *out* of the Go Smart program is California State University at San Bernardino. A demographic review of the region immediately surrounding this school (within a half-mile pedestrian radius of campus) determined its local demographic character.

Such, again, however, is only one measure of service, as it does not directly determine the demographic makeup of the student body of the school *per se*, but indirectly does so only for the character of the immediately surrounding community, from which it may be inferred that many (but certainly not all) of the student body may be drawn. In the case of California State University at San Bernardino, though, the data regarding student body composition was obtainable. An analysis of the demographic makeup of both the surrounding community (residents within one-half-mile radius) and the CSUSB student body itself indicated the following:

	TOTAL POPULATION	Low-Income Whites	Minorities	L.I.M.	Percentage Minority	Percentage LIM
Cal State Univ San Bernardino: Within half-mile of campus	5,495	145	4,161	4,306	75.7%	78.4%
Cal State Univ San Bernardino: Student Body Demographics	18,234		14,223		78.0%	

Compare both data sets to the same information describing the demographic character of both Omnitrans' service area and the surrounding county:

	TOTAL POPULATION	Low-Income Whites	Minorities	L.I.M.	Percentage Minority	Percentage LIM
JPA CITY Population (2010 Census)	1,468,118	31,992	1,070,435	1,102,427	72.9%	75.1%
County Population (2010 Census)	2,035,210	67,850	1,357,612	1,425,462	66.7%	70.0%
Within Half-Mile of ANY Omnitrans Fixed Route Service	1,253,669	26,669	946,550	973,219	75.5%	77.6%

From these data, it is seen, firstly, that the schools which opted into the Go Smart program and became partners have demographic makeups which are indicative of higher LIM proportions than in either the surrounding service area or the county as a whole. Opting into the program is seen as an economic boon for this ridership, then, and does not adversely impact the LIM population. Secondly, the population of Cal State University at San Bernardino, which chose to opt out of the program, still pays the same rate as before, and the demographic character of the school (78.0% to 78.4% LIM) does not appear to differ greatly from that of our service area (77.6% LIM, 75.5% minority), which in turn has a higher proportion of LIM than the county as a whole (70.0% LIM and 66.7% minority). Finally, it must be emphasized that the Go Smart program is voluntary, and every school has an opportunity to opt into it and become a partner school; the onus remains with the schools to become a member of the program.

2. Student / Youth Pass Program

Currently, Omnitrans has in place a Student Pass program. In order to be eligible, a student must have proof of age (18 or under) or demonstrate student status (show a student ID card with current registration). As it stands now, this pass applies to any student regardless of age.

The proposed policy change will do away with student status as a requisite precondition. The Student pass itself will be phased out, and replaced with a Youth pass, the only criterion now being for the rider to be 18 years old or younger with proof of age. This change will speed up transactions, and will now cover all youths regardless of whether they are students or not. However, it will also exclude students that are older than age 18. This will include most college students.

As this policy will be applied across the service area without particular geographic, spatial, ethnic, cultural, or socioeconomic target, it should apply, at least theoretically, to all ridership equally. However, it still might affect some riders more so than others, e.g. the low-income college student community. For this reason, the Go Smart program exists as an alternative for students at any partner school, including college-aged students, and this may be a fitting alternative for those who are too old for the Youth pass.

In order to test if undo impact would indeed be occurring, an analysis was done of the largest and arguably most representative college in our service area (and the one with the biggest demographic impact in the service area—namely, California State University at San Bernardino) to see if this would be the case.

	TOTAL POPULATION	Low-Income Whites	Minorities	L.I.M.	Percentage Minority	Percentage LIM
Cal State Univ San Bernardino: Within half-mile of campus	5,495	145	4,161	4,306	75.7%	78.4%
Cal State Univ San Bernardino: Student Body Demographics	18,234		14,223		78.0%	

	TOTAL POPULATION	Low-Income Whites	Minorities	L.I.M.	Percentage Minority	Percentage LIM
JPA CITY Population (2010 Census)	1,468,118	31,992	1,070,435	1,102,427	72.9%	75.1%
County Population (2010 Census)	2,035,210	67,850	1,357,612	1,425,462	66.7%	70.0%
Within Half-Mile of ANY Omnitrans Fixed Route Service	1,253,669	26,669	946,550	973,219	75.5%	77.6%

In comparing LIM composition in the environs of CSUSB versus within one-half-mile of any of our fixed routes, we find that the LIM compositions are similar, although a little more pronounced on the CSUSB campus. A comparison of minority proportions alone for both shows that there is a higher proportion of minorities at the CSUSB campus than within the half-mile fixed route buffer (78.0% versus 75.5%). However, when compared to a survey of ethnic makeup of all public schools in San Bernardino County or by city within our service area, a different situation arises:

San Bernardino County	Percent
African American/Black	9.5%
American Indian/Alaska Native	0.6%
Asian/Asian American	3.2%
Filipino	1.4%
Hispanic/Latino	61.5%
Native Hawaiian/Pacific Islander	0.5%
White	21.1%
Two or More Races	1.6%
<i>Data taken from Lucile Packard Foundation for</i>	
<i>Children's Health, kidsdata.org</i>	Minority proportion: 78.9%

Recall that the prime beneficiaries of the policy change will be non-collegiate (primary and secondary) schools, and not colleges. The data indicate that within such schools in San Bernardino County, minority proportion of students is 78.9% (compared to 78.0% at CSUSB). This shows that there is not undue impact upon the minority population of our service area by this policy change.

Finally, recall that for those students who fall off of the Youth Pass program (older than age 18), they always have another option: their colleges can always opt into becoming Go Smart program passenger schools, and the onus falls upon those schools, then, to approve opting into that program.

3. ADA / Access Subscription Program

Omnitrans has long had in place a curb-to-curb, Demand Response program to meet the needs of the ADA (Americans with Disabilities Act) population in its service area, and its name is Access. One of the passes currently offered to ADA / Access riders is the premium service known as the Subscription service program. This program provides unlimited use on a month-to-month basis of curb-to-curb pickups for customers of the Access program who schedule recurring service pickup and delivery to the same destination repeatedly over time. For a premium fare, riders can have their pickups scheduled well in advance and not have to wait as long as they would have to for regular Access pickup, as vehicles would arrive as per schedule for recurring rides on same days, times, and addresses.

The change in fare policy for the Subscription program will be as follows: price per month for Access Subscription service will now be the same as cash / ticket price. This means that the price for Access Subscription fares will be reduced to equal that paid for cash fares.

In order to assure that this change in policy will not unduly affect Low Income / Minority populations, an analysis was made to determine the impact of this fare policy change on riders.

The impact of the proposed change to policy will be as follows. Firstly, the price for the service will be reduced, not increased, which does not constitute a direct and unfavorable economic impact on LIM populations. Secondly, a survey was conducted of the Access ridership rolls in order to determine which individuals were Subscription fare riders. A total of **four** individuals were identified as current Subscription pass users; this is out of a total of 2,913 unique users of Access (over 139,410 Access trips) as determined by analysis of a three-month period of usage from January to March of 2013. Thirdly, the reduction in revenue of this policy change was determined to be negligible, and would not adversely impact these individuals, any other Access customers, or any fixed route ridership. Thus, the fare policy change regarding Access Subscription is seen to have no impact upon LIM populations.

Service Equity Analysis, implemented on April 28, 2014.

ITEM # E12

DATE: November 6, 2013

TO: Board Chair Alan Wapner & Members of the Omnitrans Board of Directors

THROUGH: P. Scott Graham, Interim CEO/General Manager

FROM: Anna Rahtz, Acting Director of Planning and Development Services

SUBJECT: **TITLE VI SERVICE EQUITY ANALYSIS OF sbX GREEN LINE SERVICE**

FORM MOTION

Adopt the Title VI Service Equity Analysis of sbX Green Line and accompanying changes to Routes 2 and 7.

This item was reviewed by the Administrative and Finance Committee at its October 15, 2013 meeting, and recommended to the Board of Directors for adoption.

BACKGROUND

As a recipient of funding from the Federal Transit Administration (FTA), Omnitrans is required to report at least triennially regarding compliance with Title VI requirements as outlined in the FTA Circular 4702.1B, dated October 1, 2012, and as originally set forth in Section 601 of Title VI of the Civil Rights Act of 1964. The Agency must demonstrate that it does not discriminate against, exclude from, or deny service based on race, color, or national origin.

In addition to triennial Title VI reporting, FTA guidelines now require a Title VI analysis to be completed and adopted by the recipient's governing board prior to major service changes, fare changes, or the introduction of a fixed guideway system. These are required to ensure that Title VI considerations are part of the planning process prior to implementation. The launch of revenue service for the sbX Green line in April 2014 comprises both a major service change and the introduction of a fixed guideway system. This Title VI analysis constitutes completion of an Environmental Justice assessment begun as part of the planning process for the sbX E Street Corridor BRT Project, originally reported in the *Environmental Assessment Initial Study* done by Parsons Transportation Group in June of 2009 (Chapter 4.11 Demographics and Neighborhoods).

The proposed changes to service include the following:

- **sbX Green Line BRT service:** sbX is a bus rapid transit (BRT) service that will run from the Kendall and Palm station at its north terminus to Loma Linda University/Medical Center and VA Hospital at the south end. Twenty stations (stops) are being constructed at sixteen intersections, with center-running dedicated lanes on E Street in downtown San Bernardino and on Hospitality Lane. Fourteen 60-foot articulated vehicles (11 in service, 3 spares) will be used to provide 28,800 hours of service with ten-minute peak weekday service and fifteen-minute off-peak weekday service.
- **Route 2:** Service frequency will be reduced so as to complement sbX, and the northern terminus of the route will be extended from CSUSB to the new station at Kendall and Palm.
- **Route 7:** Duplicative or nearly duplicative service along Kendall (which will now be covered by route 2 and sbX) will be eliminated. As well, the Palm/Ohio/Pine loop at the end of Kendall will be eliminated as the route will now terminate at CSUSB.

The service changes for the proposed modifications to routes 2 and 7 and for the introduction of sbX service (in terms of hours, miles, and budget) were included in the approved FY 2014 Service and Budget Elements.

An equity analysis was completed for the proposed service changes, using demographic data within a ½ mile walking distance of the sbX corridor and routes 2 and 7. The analysis shows that implementing the proposed service changes will not adversely impact the Low-Income or Minority (LIM) community, but will, rather, augment service to those within walking distance of the sbX stations.

Exhibit 1 shows a GIS (Geographical Information Systems) spatial analysis of census demographic data showing proportion of minority residents in the area affected by the proposed service changes, by block group.

Exhibit 2 shows comparisons of Low-Income or Minority (LIM) populations countywide and within Omnitrans' service area to half-mile pedestrian walking buffers for routes 2, 7, and around the sbX stations. This demonstrates that sbX service is associated with a higher LIM proportion than any other measure, and the reduced area (the Pine/Ohio/Palm loop) buffer has a lower LIM proportion than any other measure. The results of the service equity analysis show that the proposed service changes comply with Title VI requirements.

Exhibit 1: E Street Corridor, sbX service, Routes 2 and 7, and percent minority residents by census blocks.

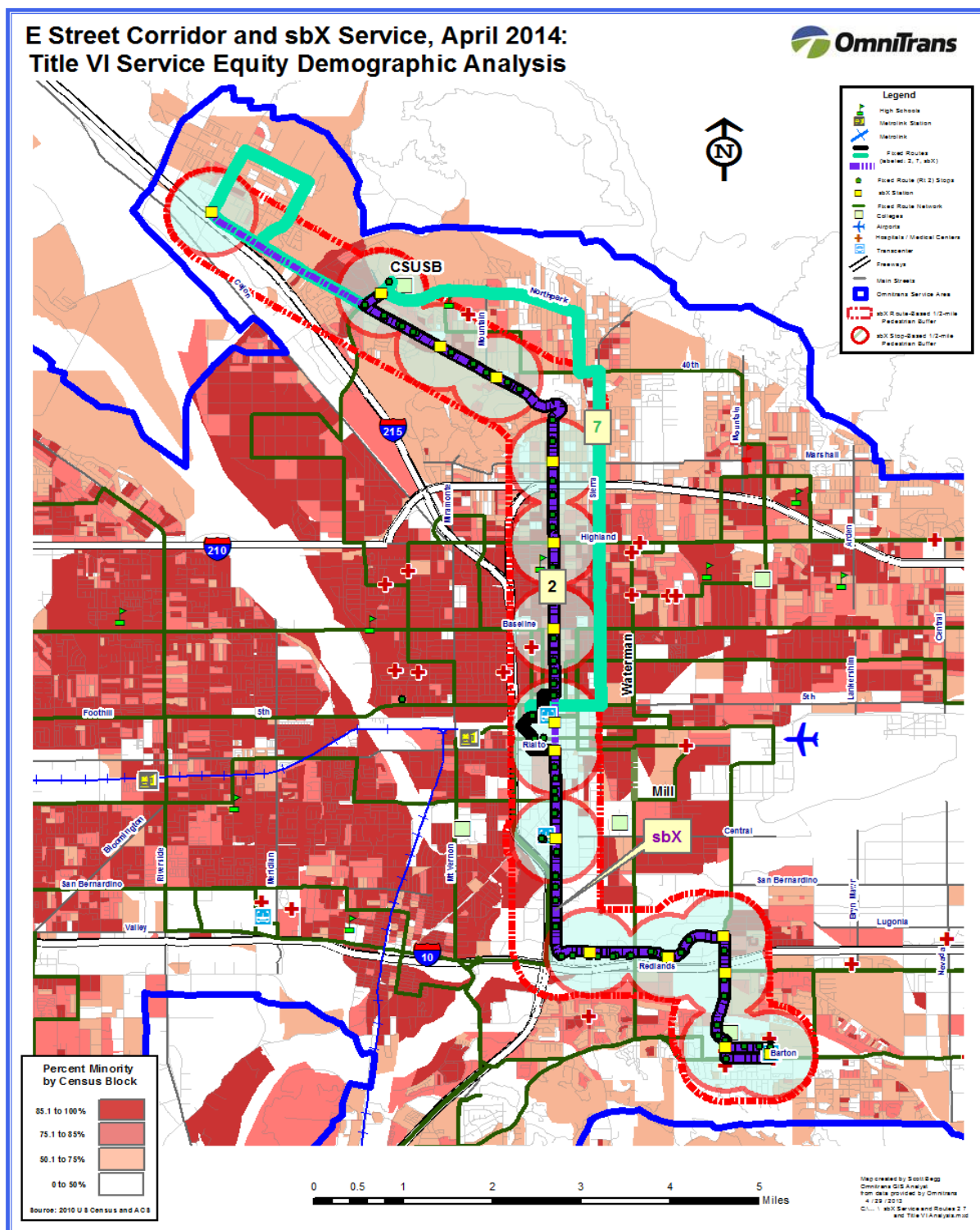


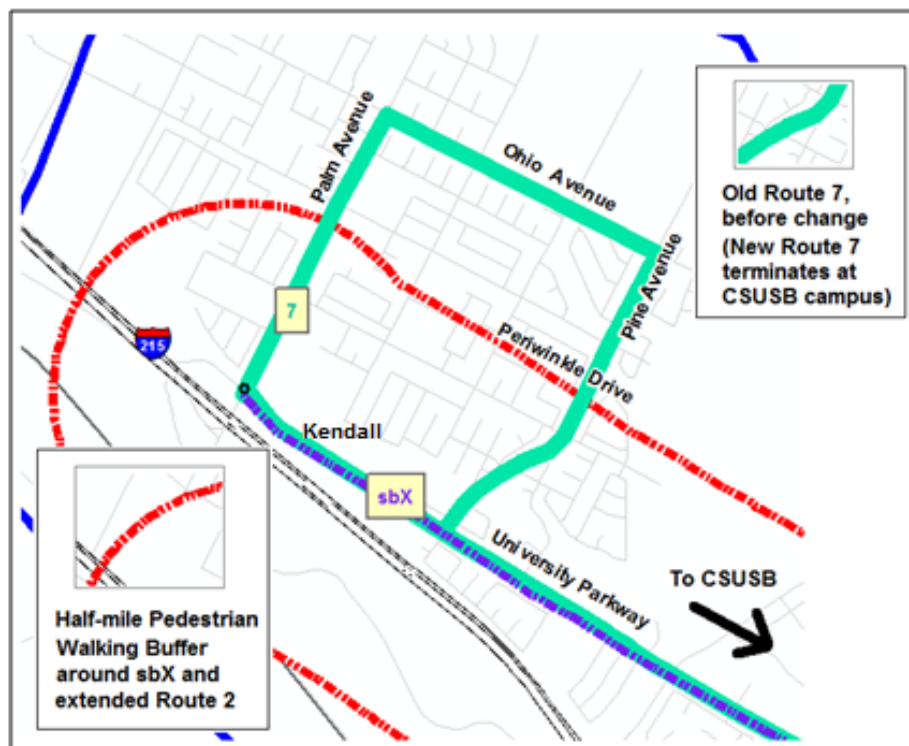
Exhibit 2: Comparison of Low-Income/Minority (LIM) populations within the county, within Omnitrans' service area, and within pedestrian buffers of stops for routes 2, 7, sbX, and Pine/Ohio/Palm loop, taken from ACS and 2010 US Census block group data.

2012-2013 Determination by Route of Title VI Compliance: sbX versus Routes 2 and 7 (STOP BUFFER METHOD)						
Region:	Total Population	Low Income Whites	Minority	TOTAL LIM	% LIW of LIM	Percentage LIM
Countywide	2,035,210	67,850	1,357,612	1,425,462	4.8%	70.0%
Within 3/4-Mile of All Service (ADA/Access Service Area Boundary)	1,386,945	29,647	1,032,311	1,061,958	2.8%	76.6%
One-Half-Mile Pedestrian Buffer surrounding Route:						
Route 2	58,497	1,952	45,202	47,154	4.1%	80.6%
Route 7	68,313	2,013	51,852	53,865	3.7%	78.9%
Routes 2 & 7	99,386	3,017	75,012	78,029	3.9%	78.5%
sbX BRT Route	47,580	1,579	36,264	37,843	4.2%	79.5%
Reduced Area (Pine-Ohio-Palm)	4,741	94	2,815	2,909	3.2%	61.4%

As sbX will traverse the same corridor paralleled or followed by the alignments of fixed routes 2 and 7, it is expected that these two routes will be most directly impacted by sbX service and will see some associated reduction in service. Route 7 can anticipate a weekday loss of 778 service hours. For route 2, the difference will be more significant: annual weekday service hours can expect to be reduced by 11,814 hours. There will also be very minor changes in hours for routes 2 and 7 on the weekend (for a total of 49 hours gained). However, the weekday reductions will be more than compensated for by sbX service, which will add 28,800 hours, for a net positive addition of 16,257 revenue hours. Walking distances will be greater for sbX service due to it being a BRT route, and as such stop spacing will be up to four-times the distance between stops for local routes. For individuals who can not walk to an sbX station, local service will be reduced, but for those who can walk or otherwise access an sbX station, service will be increased.

Reduction in Route 7 will also translate to a loss of service in the Palm/Ohio/Pine Avenues loop at its present terminus. The proportion of Low-Income/Minority (LIM) residents in this buffer area is 61.4%, which is below that of any other measure of the local region (around route 2 or 7, around the sbX corridor, within Omnitrans' service area, or even within the entire county itself). The route will now terminate at the Cal State University of San Bernardino (CSUSB) campus. As shown in Exhibit 3, both Route 2 and sbX will continue to serve the region along University Parkway/Kendall to Palm Avenue, but the loop itself will no longer be served.

Exhibit 3: Route 7 before change to Palm/Ohio/Pine loop, and addition of sbX service to Kendall and Palm.



When compared overall to service before the beginning of sbX along the E Street corridor, the reduction in both routes 2 and 7, along with the addition of sbX service, is seen as a benefit for Omnitrans' Low-Income/Minority (LIM) population within walking distance of the sbX stations in that it adds more service hours and buses along this corridor than had been devoted before.

CONCLUSION

Staff recommends that the Board of Directors adopt the Title VI Service Equity Analysis of the sbX Green Line and the accompanying changes to Routes 2 and 7. Approval of changes to routes 2 and 7 and beginning of sbX service will provide high-speed transit and improved transit efficiency, as it increases service along the E Street corridor.

PSG:AR

Service Equity Analysis: sbX Green Line and Routes 2 and 7

April 2014

Introduction

As a recipient of federal funding under the Federal Transit Administration's guidelines, Omnitrans is required to report at least triennially on compliance with Title VI requirements. These requirements are outlined in the FTA Circular 4702.1B, dated October 1, 2012. More generally, these requirements are set forth in Section 601 of Title VI of the Civil Rights Act of 1964. This states that no person will be discriminated against, excluded from, or denied service based on race, color, or national origin. In order to abide by the Civil Rights Act, each transit agency must report on the services it provides in relation to the population in its service area. In this way, it may be demonstrated that no group or groups are being denied service based on discriminatory planning.

Omnitrans is also required to report in the same manner regarding compliance with Title VI requirements for every major fare and/or service change before it occurs. These reports must be completed and approved by the governing board at least six months before service or fare changes go into effect. Omnitrans' Board will be presented this Title VI Service Equity Analysis for approval in November of 2013, six months before revenue service changes take place in April of 2014.

The E Street Corridor Bus Rapid Transit Project (sbX Green Line)

Following two years of construction, Omnitrans will launch the first of ten planned sbX (San Bernardino Valley Express) corridors into service in April 2014. The bus rapid transit service will employ 60-foot-long articulated coaches, and is designed to optimize vehicle operating speeds and travel time, while minimizing travel delay, right-of-way acquisitions, and other community and environmental impacts. The E Street (Green Line) corridor was designated as the highest priority corridor in the Long Range Transit Plan by the San Bernardino Associated Governments (SANBAG).

The sbX Green Line will operate along the E Street Corridor, generally following Kendall Drive from Palm Avenue to California State University San Bernardino, then along E Street through downtown San Bernardino, along Hospitality Lane, and south to Loma Linda University Medical Center and the Veteran's Administration (VA) Hospital.

Length: The Refined Locally Preferred Alternative (RLPA) as currently defined consists of 15.7 miles of combined mixed-use and dedicated BRT alignment.

No. of Stations: 23 stations (stops) at 16 intersections.

Vehicles: Fourteen (14) articulated BRT vehicles, 11 in service and 3 spares.

Forecast Total Annual Service Revenue Hours: 28,800 revenue hours. Service will initially only be on weekdays.

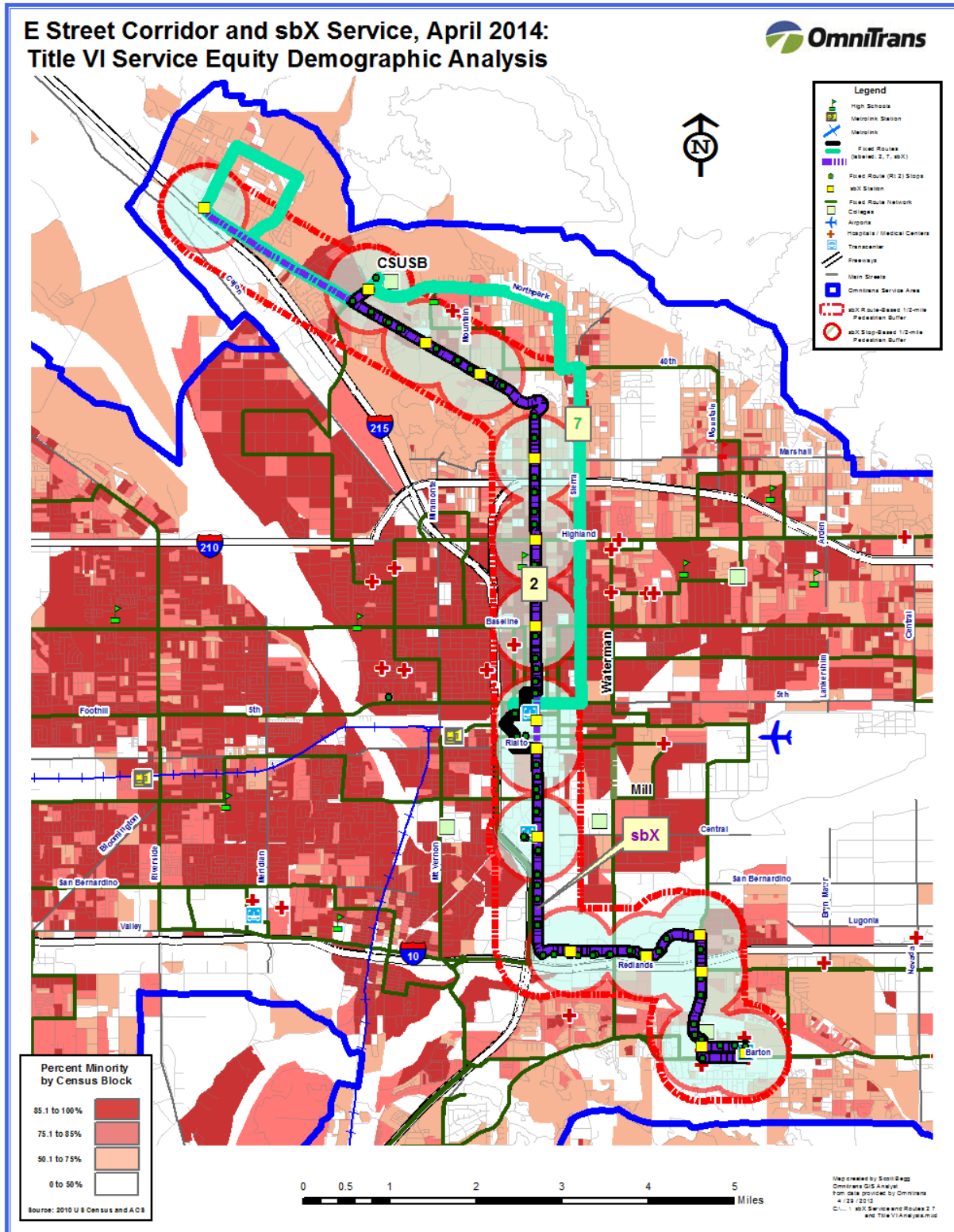
Service Frequency: At peak, ten-minute frequency weekday along the corridor with 15-minute service in the off-peak.

Ridership Forecast: Opening year, April 2014, ridership is projected at 5,600 boardings per day.

Detailed descriptions of the sbX corridor and baseline alternatives analysis are found in previous reports on the Alternative Analysis (September 2004), and the Refined Locally Preferred Alternative (August 2009). (Parsons/Hexagon), and *Operations and Maintenance Plan and Costs* original reports (Parsons Transportation Group, May 2009, August 2009, September 2009).

The operating plan assumes the opening year FY 2014 of sbX service, and is a plan that reflects a conservative approach to the introduction of service by lessening the impact on Omnitrans' overall operating budget. The opening year operating plan is limited to weekday service covering a 14-hour service span, with 10 minute peak period headways and 15 minute off-peak headways. This operating plan will be served by a fleet of 14 sbX vehicles (11 in service and 3 spares). Over the years, as planned development in the E Street Corridor occurs, the operating plan will be expanded to include weekend service, and ultimately will include 5-minute service frequency through the corridor.

The sbX will operate on 10 minute peak headways and 15 minute off-peak headways, and will serve 16 stations designed and constructed specifically for the E Street Corridor project. The alignment of the sbX is displayed in Figure 1. The Refined Locally Preferred Alternative (LPA) is an update to the LPA that was developed during the Alternatives Analysis phase of the E Street project. The details of the Refined LPA was described in Parsons' previous report —*Operations & Maintenance Plan and Costs Report*, September 2009 (Appendix A).



As the Refined Locally Preferred Alternative featured the new sbX as a premium transit service, special enhancements include Transit Signal Priority treatment at intersections. sbX will operate in 5.4 miles of exclusive lanes and 10.3 miles of mixed traffic.

Anticipated benefits of this BRT service will include: encouraging Transit Oriented Development, stimulating the local economy, reducing vehicular traffic and emissions, revitalizing station neighborhoods, creating construction jobs, and lowering transit vehicular emissions by having the articulated coaches be powered by compressed natural gas.

In order for the sbX project to become a reality, agency resources had to be reallocated in a way which minimally impacted local transit-dependent riders and low-income/minority riders within our service area. Every effort was made to meet these requirements. Since the first BRT corridor either paralleled or followed the same alignment as fixed routes 2 and 7, these would be the routes most directly impacted by sbX service. For route 2, there will be concomitant reduction in service from 45,602 total annual service revenue hours to 33,788 predicted annual service revenue hours (this translates to a service frequency reduction from 15-minute frequency to 30-minute frequency on weekdays for Route 2, and no change in frequency at all on weekends); for route 7, there will be reduction in total annual service revenue hours from 12,875 to 12,097 hours. This will need to be seen in light of the accompanying increase in more frequent and direct service along the same corridor by the bus rapid transit sbX line when it begins service in April of 2014: sbX will run ten minute service at its peak along this corridor, complementing Route 2, and will add 28,800 additional service revenue hours.

ANALYSIS: Comparison of Routes 2 and 7 with sbX

An analysis of the demographic character of the regions immediately surrounding both fixed routes 2 and 7 (and the merged combination of 2 and 7), and the proposed sbX BRT route was undertaken using geographic information systems (GIS). For all routes, a one-half mile pedestrian walking buffer was applied, and block- (or tract-) level determinations of proportions of minority and low income (LIM, Low-Income/Minority) populations were made. These were compared, and in turn compared to the level of same for San Bernardino County as a whole. The results are given in the following table.

2012-2013 Determination by Route of Title VI Compliance: sbX versus Routes 2 and 7 (ROUTE BUFFER METHOD)						
Region:	Total Population	Low Income Whites	Minority	TOTAL LIM	% LIW of LIM	Percentage LIM
Countywide	2,035,210	67,850	1,357,612	1,425,462	4.8%	70.0%
One-Half-Mile Pedestrian Buffer surrounding Route:						
Route 2	60,611	2,436	46,919	49,355	4.9%	81.4%
Route 7	69,247	2,038	52,683	54,721	3.7%	79.0%
Routes 2 & 7	100,875	3,065	76,250	79,315	3.9%	78.6%
sbX BRT Route	64,578	1,951	49,133	51,084	3.8%	79.1%
Reduced Area (Pine-Ohio-Palm)	4,741	94	2,815	2,909	3.2%	61.4%

A second analysis was performed using the same methodology. This time, however, the half-mile pedestrian walking buffer was made about all bus stops, and not along the route proper. In the case of the sbX route, there were a total of 23 stops at 16 locations along the route. This form of analysis gives a perhaps more accurate appraisal of real-life walking conditions for riders, as they actually do not board buses anywhere along the route, but only at designated stops. Given an average spacing of two-tenths of a mile for fixed route stops, the difference in demographics between route-based buffers and stop-based buffers is essentially negligible. However, in the case of sbX, which operates as a limited-stop, BRT route, only sixteen stations will exist for the coaches along the entire route, and these will average a mile distance from each other; in this situation, the demographic difference between route-based and stop-based buffers could be significant. The results of this analysis are given in the following table.

2012-2013 Determination by Route of Title VI Compliance: sbX versus Routes 2 and 7 (STOP BUFFER METHOD)						
Region:	Total Population	Low Income Whites	Minority	TOTAL LIM	% LIW of LIM	Percentage LIM
Countywide	2,035,210	67,850	1,357,612	1,425,462	4.8%	70.0%
One-Half-Mile Pedestrian Buffer surrounding Route:						
Route 2	58,497	1,952	45,202	47,154	4.1%	80.6%
Route 7	68,313	2,013	51,852	53,865	3.7%	78.9%
Routes 2 & 7	99,386	3,017	75,012	78,029	3.9%	78.5%
sbX BRT Route	47,580	1,579	36,264	37,843	4.2%	79.5%
Reduced Area (Pine-Ohio-Palm)	4,741	94	2,815	2,909	3.2%	61.4%

TRIP AND SERVICE FREQUENCY REDUCTION:

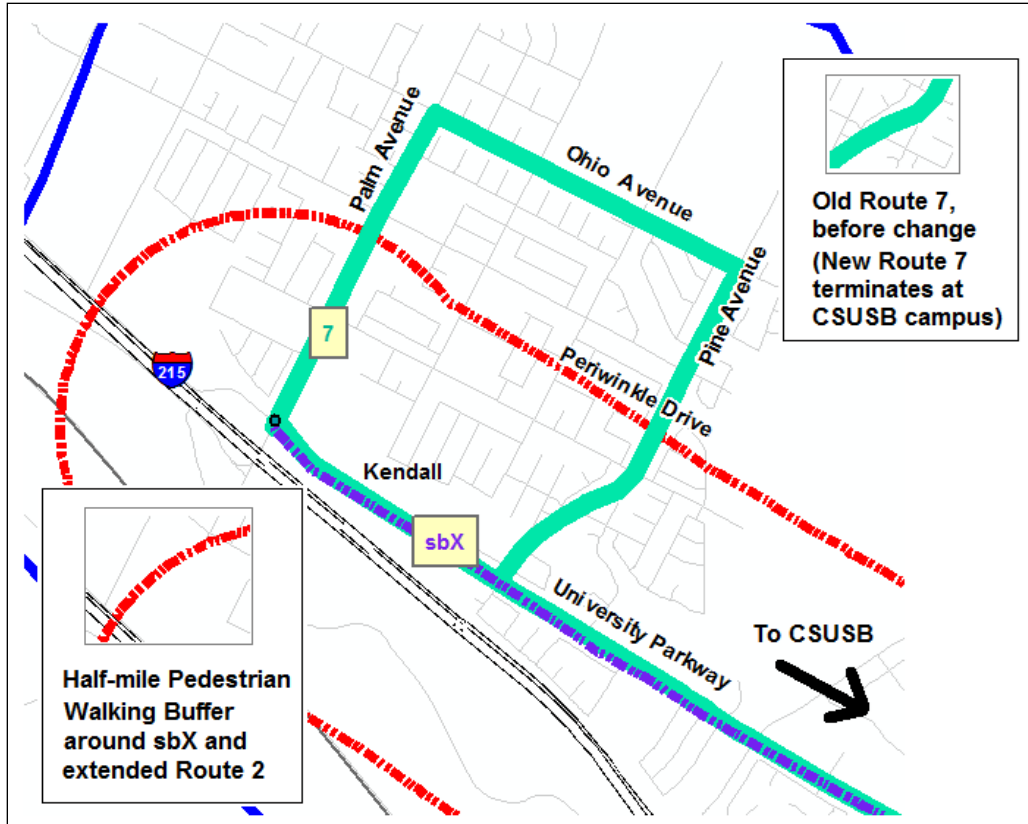
As sbX will traverse the same corridor paralleled or followed by the alignments of fixed routes 2 and (parts of) 7, these would be the routes most directly impacted by sbX service. Implementation of sbX along E Street necessarily translates to some reduction in service for these routes quantitatively.

Following are tabulated data regarding the predicted effect on service for FY2014 (the first full fiscal year of sbX implementation) versus baseline route performance for FY2013, which would not have such service:

Differences in Coaches and Annual Service (Revenue) Hours Between Status Quo and Proposed Change with sbX (Annualized for FY2014)						
TOTAL	Total Number of Coaches		Difference	Total Annual Service Hours (Revenue)		Difference
Route	Status Quo	Proposed Change with sbX		Status Quo	Proposed Change with sbX	
2	11	8	-3	45,520	33,810	-11,710
7	4	3	-1	12,875	12,042	-833
sbX	0	11	11	0	28,800	28,800
					Difference	16,257
WEEKDAYS	Total Number of Coaches		Difference	Total Annual Service Hours (Revenue)		Difference
Route	Status Quo	Proposed Change with sbX		Status Quo	Proposed Change with sbX	
2	11	6	-5	36,049	24,235	-11,814
7	4	3	-1	10,774	9,996	-778
sbX	0	11	11	0	28,800	28,800
		Difference	5		Difference	16,208
SATURDAYS	Total Number of Coaches		Difference	Total Annual Service Hours (Revenue)		Difference
Route	Status Quo	Proposed Change with sbX		Status Quo	Proposed Change with sbX	
2	8	8	0	5,198	5,271	73
7	2	2	0	1,096	1,059	-37
sbX	0	0	0	0	0	0
					Difference	36
SUNDAYS	Total Number of Coaches		Difference	Total Annual Service Hours (Revenue)		Difference
Route	Status Quo	Proposed Change with sbX		Status Quo	Proposed Change with sbX	
2	8	8	0	4,273	4,304	31
7	2	2	0	1,005	987	-18
sbX	0	0	0	0	0	0
					Difference	13
					GRAND TOTAL	16,257
All data taken from Omnitrans' annualized fiscal year estimation of FY2014 total service hours for all routes, status quo and proposed for sbX service.						

Reduced Region: (Pine-Ohio-Palm)

A final analysis was made of the demographic character of the one region that would lose service (not due to the advent of sbX, however): the Pine-Ohio-Palm loop. This is shown in the following inset.



This area has had extremely low ridership, and is notably more affluent than along the rest of the other two routes (routes 2 and 7) or the service area average. It is important to note as well that service will not cease along this loop because of sbX service (this region, again, roughly defined as northeast of the pedestrian buffer region, northeast of Periwinkle drive, and defined by Palm, Ohio, and Pine Avenues). Instead, service will end for this portion of the route simply because it has been very unproductive. For this reason, Route 7 will no longer serve this portion of its route, as it will terminate at the Cal State San Bernardino University campus. Route 2, however, will pick up this portion of the route along University Parkway-Kendall alone, and will serve to the end of Palm and Kendall, on weekdays and weekends, and sbX will serve the same portion on weekdays. The only portion of the coverage to be discontinued, then, will once more be the aforementioned segment (Palm, Ohio, and Pine Avenues).

The analysis shows that the demographics of this segment are characterized by a markedly lower LIM proportion than that seen in over the rest of the routes (2, 7, and sbX), and markedly lower LIM proportion than that seen in the county overall (61.4% LIM, versus 70% to 80%) or Omnitrans' service area (61.4% versus 76.6%).

RESULTS

Demographic analysis of the areas immediately surrounding sbX and routes 2 and 7 by use of GIS spatial tools has determined that implementing sbX along the E Street corridor will not adversely impact the local LIM community, but will, if anything, augment service to those within walking distance of the sbX stations.

In 2014, sbX will not run on weekends (Saturdays and Sundays). This means that sbX will not compete with or limit resources for routes 2 and 7 on weekends. There will be very minor alterations to routes 2 and 7 resulting from the changes to their respective alignments, and this will be reflected in minor changes in service revenue hours on the weekend. For route 2, revenue hours on Saturday will go from 5,198 to 5,271 and on Sundays will increase from 4,273 to 4,304; for route 7 on Saturdays, revenue hours will go from 1,096 to 1,059 and on Sundays will decrease from 1,005 to 987. Overall, this will result in an increase of 36 revenue hours on Saturday and 13 revenue hours on Sunday (49 hours combined) for these two routes.

On weekdays, however, sbX will come online and will be run on the E Street corridor, and as such will limit resources for both routes 2 and 7. Route 7 can anticipate a loss of one coach (seeing a reduction from 4 to 3 coaches) and a reduction of 778 hours of service. For route 2, the difference will be more significant: annual weekday service hours can expect to go down from 36,049 to 24,235—a resulting reduction of 11,814 service hours. The route should also see a loss of 5 vehicles (from 11 coaches to 6 coaches on weekdays).

This reduction in number of trips and frequency of service for these two fixed routes will be more than offset by the introduction of sbX BRT service along the E Street Corridor. During the same year, sbX will introduce 11 new articulated coaches and add 28,800 hours of service. When combined, the reduction in routes 2 and 7 plus the addition of sbX service will yield a gain of 5 vehicles overall to serve this area (11 added minus 6 lost), and an additional 16,257 hours of service (28,800 added minus 12,543 total lost). When seen this way, the addition of sbX service is an overall benefit, which adds more coaches and more service hours along this corridor than had been in place before.

This Service Equity Analysis of sbX and fixed routes 2 and 7 is scheduled to be approved in November, 2013, six months before the beginning of revenue service of sbX and before fixed route service changes go into effect in April, 2014.

OmniConnects' SRTP Fare Change and East Valley Service Change Equity Analysis, implemented on September 2, 2014.

13 TITLE VI FARE AND SERVICE EQUITY ANALYSES

As a recipient of federal funding under the Federal Transit Administration's (FTA's) guidelines, Omnitrans is required to report at least triennially on compliance with Title VI requirements. These requirements are outlined in the FTA Circular FTA C 4702.1B, dated October 1, 2012. These requirements are set forth in Section 601 of Title VI of the Civil Rights Act of 1964, which states that no person will be discriminated against, excluded from, or denied service based on race, color, or national origin.

To remain in compliance with the Civil Rights Act, each transit agency must report on the services it provides in relation to the population in its service area. In this way, it may be demonstrated that no group or groups are being denied service based on discriminatory planning.

Omnitrans is also required to conduct a Title VI analysis during the planning process for every major fare or service change before it occurs. By including these Fare and Service Equity Analyses in the Short Range Transit Plan, Omnitrans is demonstrating compliance in that the evaluations were completed as a component of the planning process.

13.1 Fare Equity Analysis

Omnitrans' proposed Fare Policy is detailed in Chapter 13. As a Short-Range Transit Plan, OmniConnects must deliver a proposal with a balanced budget using expected available revenue sources compared to forecasted costs. In order to develop a balanced budget and meet California's Transportation Development Act (TDA) mandated

farebox recovery ratios, Omnitrans proposes three fare increases between FY2015 and FY2020.

13.1.1 Background

The Fare Equity Analysis does not address whether or not the agency can increase fares, but whether or not the agency does so in a fair and equitable manner. The analysis verifies that the proposed fare changes do not unfairly impact minority ridership, either by disparate treatment (intentional action) or by disparate impact (unintentional consequence). By offering alternate fare payment forms, Omnitrans gives its riders options whereby costs can be reduced and the effects of fare increases can be mitigated.

Omnitrans has not had a fare increase since September 2009 (FY2010). Since then, Omnitrans' peer agencies have increased their fares, while Omnitrans has added additional service (OmniGo and sbX), added real-time bus arrival information in NexTrip, undergone rebranding (which included a refreshing of at-station amenities) and made many other improvements.

As Omnitrans must present a balanced budget, OmniConnects' plan includes three across-the-board fare increases: 16% increase in FY2015, 14% increase in FY2017, and 12% in FY2019.

The proposed fare increases are described in Exhibit 147, Exhibit 153, and Exhibit 152.

The proposed fares maintain Omnitrans' current fare structure in terms of multiple discounts, and

the relative discounts are generally maintained for discounted fare groups.

Access fares are described in Exhibit 3. These fares are determined by a rule which states that ADA complementary paratransit fares cannot exceed two times the fixed route base fare. Omnitrans also proposes a change to the Access zone map to remain compliant with ADA regulations.

The three fare increases proposed over the next five fiscal years are necessary to close a projected budgetary shortfall.

Omnitrans is not currently fare-comparable with its peers; Omnitrans' base fixed route fare is currently \$1.50; local peers are currently at an average of \$1.69 based on a comparison to 25 transit agencies in California, and national mid-sized bus operator peers are currently at an average of \$1.75. These proposed increases in fares will rectify a long period of delay in fare adjustment and bring us into the main with comparable fares.

Exhibit 151 Proposed Fixed Route Fare Structure

	FY2013	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020
Cash/Ticket Fares								
Full-Fare	\$1.50	\$1.50	\$1.75	\$1.75	\$2.00	\$2.00	\$2.25	\$2.00
Senior/Disability/Medicare	\$0.60	\$0.60	\$0.75	\$0.75	\$0.90	\$0.90	\$1.00	\$1.00
Day Passes (Single)								
Full-Fare	\$4.00	\$4.00	\$5.00	\$5.00	\$6.00	\$6.00	\$6.75	\$6.75
Senior/Disability/Medicare	\$1.85	\$1.85	\$2.25	\$2.25	\$2.25	\$2.75	\$3.00	\$3.00
Day Passes (10-Pack)								
Full-Fare	\$36.00	\$36.00	\$45.00	\$45.00	\$54.00	\$54.00	\$60.75	\$60.75
Senior/Disability/Medicare	\$15.50	\$15.50	\$20.00	\$20.00	\$24.75	\$24.75	\$27.00	\$27.00
7-Day Passes								
Full-Fare	\$15.00	\$15.00	\$18.00	\$18.00	\$20.00	\$20.00	\$23.00	\$23.00
Senior/Disability/Medicare	\$7.00	\$7.00	\$8.00	\$8.00	\$9.00	\$9.00	\$11.00	\$11.00
Youth	\$11.00	\$11.00	\$14.00	\$14.00	\$15.00	\$15.00	\$17.00	\$17.00
31-Day Passes								
Full-Fare	\$47.00	\$47.00	\$55.00	\$55.00	\$60.00	\$60.00	\$69.00	\$69.00
Senior/Disability/Medicare	\$23.50	\$23.50	\$27.50	\$27.50	\$30.00	\$30.00	\$34.50	\$34.50
Youth	\$35.00	\$35.00	\$41.00	\$41.00	\$45.00	\$45.00	\$52.00	\$52.00
Go Smart								
Go Smart	The Go Smart fare is a pre-negotiated fare for all riders that attend a partner university, college, trade/technical school, or high school, or work at a partner employer. Participants must have an active, valid Omnitrans-compatible ID card as proof of fare.							
Free Fares								
Children	Height < 46"; limit 2 free per fare-paying rider.							
Personal Care Attendant	Accompanying an ADA Rider.							
Transit Agency Employees	Omnitrans and RTA Employees and family with Employee/Family ID; OCTA, LA Metro and Foothill Transit Employees with Employee ID.							
Promotional Fares	Free or reduced fares for promotional efforts may be authorized by the Director of Marketing, the CEO/General Manager or the Board of Directors in accordance with their purchasing authority levels. Promotional fares shall be made available on a limited time basis only. Free or reduced fares cannot be provided for ongoing use by any group or organization as this would circumvent the fare policy. Special event free-ride vouchers for community organizations shall be limited to no more than two events per year.							
Regional Transfers								
OmniLink Transfer	Free with a valid transfer.							
Metrolink Transfer	Free to rider; SCRRRA pays one base fare for two boardings with a Metrolink ticket/pass. A one-way Metrolink ticket can be used leaving a Metrolink station. A round trip Metrolink ticket or pass may be used to/from a Metrolink station.							
RTA Transfer	Omnitrans accepts valid RTA passes as a one-ride transfer at a point of contact. RTA reciprocates for local service and a \$1.50 charge for CommuterLink.							
Foothill Transit Transfer	Omnitrans accepts current valid Foothill Transit Passes as a one-ride transfer at a point of contact. Foothill Transit reciprocates.							
OCTA Transfer	Omnitrans accepts current valid OCTA Passes as a one ride transfer at a point of contact, currently only the Chino Transit Center. OCTA reciprocates.							
Measure I Subsidy								
On Board S&D	\$0.10 per boarding							
Outlet S&D	\$0.05 per boarding							

Exhibit 153: Proposed OmniLink Fare Structure

	FY2013	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020
Cash Fares								
Full-Fare	\$3.00	\$3.00	\$3.50	\$3.50	\$4.00	\$4.00	\$4.50	\$4.50
Senior/Disability/Medicare	\$1.50	\$1.50	\$1.75	\$1.75	\$2.00	\$2.00	\$2.25	\$2.25
Youth	\$2.00	\$2.00	\$2.50	\$2.50	\$3.00	\$3.00	\$3.50	\$3.50
10-Ticket Books								
Full-Fare	\$27.00	\$27.00	\$31.50	\$31.50	\$36.00	\$36.00	\$40.50	\$40.50
Senior/Disability/Medicare	\$13.50	\$13.50	\$15.75	\$15.75	\$18.00	\$18.00	\$20.25	\$20.25
Youth	\$18.00	\$18.00	\$22.50	\$22.50	\$27.00	\$27.00	\$31.50	\$31.50
Free Fares								
Children	Height < 46"; limit 2 per fare-paying rider.							
Personal Care Attendant	Accompanying an ADA-eligible Rider.							

Exhibit 152: Proposed Access Fare Structure

	FY2013	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020
Access Fares								
1-3 Zone Cash/Ticket	\$2.75	\$2.75	\$3.25	\$3.25	\$3.75	\$3.75	\$4.25	\$4.25
Each Additional Zone	\$1.00	\$1.00	\$1.00	\$1.00	\$1.00	\$1.00	\$1.00	\$1.00
Beyond the Boundary additional fee	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00
Free Fares								
Personal Care Attendants	Accompanying an ADA Rider.							
Children	Height < 46"; limit 2 per fare paying riders.							
Measure I Fare Subsidy								
Fare Subsidy	\$0.25 per boarding							

13.1.2 Analysis of Fare Type Use by Ethnicity

Although across the board fare changes might appear at first glance to be intrinsically fair to all riders, increases may still unduly affect minorities due to how fare types might be differentially utilized by ethnicity.

In order to determine how fare types were used by minorities versus white riders, an onboard survey (OmniTrans' Onboard Intercept Rider Survey) was performed by Redhill Group in 2011. The results of this survey's analysis of fare type use by ethnicity are reported in Exhibit 154. In the final column ("Outcome"), those transactions which need to be analyzed further are identified, while those that do not are identified as "No Disparate Impact." Note that in some of the tables results are reported as both proportion minority

and proportion Low-Income/ Minority (LIM). LIM is a necessary measure used in the Environmental Justice component of Title VI analyses, but is not used as part of Service or Fare Equity analyses; proportion minority is the salient measure used in all Title VI analyses. Both are reported in triennial Title VI reports. Although both measures are reported for the purpose of completeness wherever possible here, LIM data was not always available for all surveys and tables, and proportion minority is the only necessary measure.

13.1.3 Analysis and Conclusion

All fixed route fares are proposed to increase according to the schedule shown previously. However, not all increases are at exactly the same rate. In planning, it is a best practice to "spread out" the increase over the different fare types as

equitably as practicable, so as to minimize the effect on any single group of riders, and so that all riders can have the option to use more cost-effective fare options so as to save costs. Furthermore, the fares must be easy for making cash transactions: a \$0.75 fare, for example, is easier to collect than a \$0.65 or \$0.70 fare. So even though the average increase for FY2015, FY2017, and FY2019 will be sixteen percent, fourteen percent, and twelve percent, respectively, particular fare types will experience increases that are either greater or lesser than these averages. Note as well that although some fare increases may appear on the face of it to be more exorbitant, e.g., Senior / Disability Cash (One Way) fare (a 25% increase), in terms of actual cost, the fare will go up from \$0.60 to \$0.75, or only \$0.15—in all probability, a fare increase which

Exhibit 154: OmniTrans' Onboard Intercept Rider Survey Results

	MINORITY (vs Fare Type Total)	Caucasian/White (vs Fare Type Total)	TOTAL	FY2015 Fare Change	FY2017 Fare Change	FY2019 Fare Change	Outcome
Cash/Ticket Fares							
Full-Fare	23.4%	18.9%	22.5%	16.7%	14.3%	12.5%	Further Analysis Follows
Senior/Disability/Medicare	1.6%	3.7%	2.1%	25.0%	20.0%	11.1%	No Disparate Impact
Day Passes (Single)							
Full-Fare	21.2%	15.7%	20.0%	25.0%	20.0%	12.5%	Further Analysis Follows
Senior/Disability/Medicare	2.7%	6.4%	3.5%	21.6%	22.2%	9.1%	No Disparate Impact
7-Day Passes							
Full-Fare	6.2%	4.7%	5.9%	20.0%	11.1%	15.0%	Further Analysis Follows
Senior/Disability/Medicare	0.7%	1.5%	0.8%	14.3%	12.5%	22.2%	No Disparate Impact
Youth	3.4%	1.2%	2.9%	27.3%	7.1%	13.3%	Further Analysis Follows
31-Day Passes							
Full-Fare	19.1%	19.4%	19.2%	17.0%	9.1%	15.0%	No Disparate Impact
Senior/Disability/Medicare	5.9%	14.2%	7.7%	17.0%	9.1%	15.0%	No Disparate Impact
Youth	9.9%	9.6%	9.8%	17.1%	9.8%	15.6%	No Disparate Impact
Other	5.9%	4.7%	5.6%				
TOTAL	100.0%	100.0%	100.0%				

should be more readily absorbed.

The fare types are also not used equally by minority riders as compared to white riders, as can be seen in this exhibit. Since any fare increase which is used equally by minority riders and white riders will not demonstrate disparate impact, those increases will not need to be addressed as they are not discriminatory. However, those increases in fare types which do show difference in minority usage will need to be analyzed.

Firstly, the only fare types that show differential usage patterns by race are: Cash (Full Fare), Day Pass, Single (Full Fare), and 7-day Pass (Full Fare, and Youth). All other fare type categories show either white usage at higher rates, or no difference between minority and white usage, and therefore have no disparate impact.

Secondly, the proportionally highest fare increases are for day passes and for Seniors and Disabled (Sr/Dis). Day and One-Way (cash) fares go up 25% and 16.7%, respectively. Sr/Dis passes go up 25% (one-way, or cash) and 21.6% (Sr/Dis Day pass). 7-day Youth passes also go up (27.3%).

As is noted, many of the fares which are increased the most are not unduly discriminatory toward minorities. Sr/Dis One Way passes are bought by whites at a higher proportion than by minorities, and Sr/Dis Day Passes are also purchased at a higher proportion by whites than they are by minorities.

For the four fare types which show greater purchase on the part of

minorities over whites, further analysis is in order. In each of these situations, there are mitigating options provided for all riders. In all cases, riders are left the choice to select other forms of fare passes which are less expensive, and which give consumers cost-savings by ticket purchase in bulk in the form of multiple day passes (weekly, or 7-day passes, and monthly, or 31-day passes). There is one category of the four fare types requiring further analysis in which minorities purchase passes with increased fares at a much greater proportion than whites do, and that is for Student Weekly Passes (the Youth Pass). Those youths using multiple day passes are not restricted to one- or 7-day passes, though; they always have the option to purchase 31-day Youth passes, which increase their cost savings. Also, in this case, it has been shown by survey at Chaffey College that the greatest users of the Go Smart subsidized fare passes are minority students, so minority students have this option as well.

The Go Smart program functions, in effect, as a cost-saving alternative to increased fares for the Weekly Youth Pass, and as such mitigates the effect of such fare increases. According to survey data from Chaffey College's Office of Institutional Research, out of 4,683 students (20% of the student population at Chaffey College), those most likely to participate in the Go Smart program are

African American and first generation collegiate Hispanic students (29.3% of African American student population, and 27.0% of Hispanic student population, respectively). In short, although the Youth Pass fare increase will impact minorities more heavily than whites, the option exists in any case for students in schools which are part of the subsidized Go Smart program to use Go Smart, which is a very effective cost-savings means minority students can use to reduce the impact of Youth Pass cost fare increase. Further, this category still provides a reduced fare over full fare passes.

13.1.4 OmniLink Service

OmniLink is an alternative curb-to-curb dial-a-ride service which Omnitrans has offered over the years to two communities: Chino Hills and Yucaipa. This was done because the residential densities of the more rural portions of both communities did not support traditional fixed route transit service. It was felt at the time that a type of dial-a-ride service using smaller coaches on more narrow thoroughfares might better fulfill the communities' transit needs. Since then, Omnitrans has added local OmniGo circulator services to these communities in the form of Routes 365 (Chino Hills) and Routes 308/309, and 310 (Yucaipa). Subsequently, these circulator routes have served and met the needs of the great

Exhibit 155: Percentage of Minority Residents in Omnitrans' Service Area by City

CITY	Total 2010 Population	Number "White, Non-Hispanic"	Percentage "White, Non-Hispanic"	Proportion (%) Minority	Number Minority
SAN BERNARDINO COUNTY (2011)	2,035,210	677,598	33.3%	66.7%	1,357,612
Within one-half mile of any service	1,253,669	307,119	24.5%	75.5%	946,550
Chino Hills	75,000	25,050	33.4%	66.6%	49,950
Yucaipa	51,000	33,609	65.9%	34.1%	17,391

majority of OmniLink riders, and now, due to OmniLink's very high cost for continued service, it is necessary either to increase OmniLink fares or eliminate OmniLink service. It is proposed that OmniLink service be discontinued to these two communities; in lieu of that, it is proposed that the fares for OmniLink be increased.

A view in Exhibit 155 of the population and ethnic demographics of these two communities compared to that of the county and Omnitrans' service area as a whole reveals that OmniLink fare changes do not adversely impact the minority community.

As can be seen, neither community possesses a minority proportion which is greater than that of the county or of Omnitrans' service area, as defined by the one-half mile buffer surrounding all fixed route service. The percentage of minority residents in San Bernardino County is 66.7%, and the percentage of minorities for our service area is 75.5%; at the same time, the proportion of minority residents for Chino Hills is 66.6%, and for Yucaipa is 34.1%. For this reason, Omnitrans'

actions in either increasing fares for or eliminating OmniLink service does not constitute disparate treatment or disparate impact towards minority riders.

To conclude, Omnitrans must increase fares over the next five years. This translates to three fare increases from FY2015 to FY2020. Although fares do increase across the board, survey analysis of our ridership shows that minority riders are not unfairly affected in terms of either disparate treatment or disparate impact.

13.2 Service Equity Analysis

Omnitrans has proposed a restructuring of some service within the OmniConnects FY2015-2020 Short Range Transit Plan. This follows a period of very limited to no change in its fixed route service since FY2010. Fundamentally, proposed changes to service follow these general trends:

- ▶ Straightening of north-south-oriented routes, especially in the West Valley, which have long been needed and requested by our riders;

- ▶ Consolidation and streamlining of service and connections between major trip generators by increasing more productivity-oriented routing, reducing duplicative service, and strengthening key east-west connections to the new sbX Green Line;
- ▶ Creating direct connections between Chaffey College and Fontana, and between Fontana and Yucaipa; and,
- ▶ Changing frequencies of a few routes based on historical performance compared to established standards in order to increase the overall productivity of Omnitrans' service.

A summary of the proposed major alterations is shown in Exhibit 156 and Exhibit 157 gives those routes which will undergo physical or alignment change primarily. Exhibit 157 shows those routes which will undergo frequency changes exclusively.

Exhibit 156: Proposed Physical Route Changes

ROUTE	PROPOSED SERVICE CHANGE (Alignment)	EFFECT
2	CHANGES COINCIDE WITH sbX.	Equity Analysis already performed in 2013
5	Change (straightening) of alignment to run along Waterman	Improve productivity and On-Time performance, decrease "meander"
7	CHANGES COINCIDE WITH sbX.	Equity Analysis already performed in 2013
8	Route proposed to be shortened, split into long (8 West) and short (8 East) portions	8 East (short) section will be 60 minutes; 8 West (long) will run at 30 minute frequency. Adds 2 buses weekdays.
9	Route proposed to be eliminated; portions of route will be picked up by a newly rebuilt Route 19 (which will include elements of 9 on Barton and 5 on Waterman).	Route Elimination; consolidated into Route 19; increased frequency of service on weekends.
19	Proposed to rebuild route as a longer route incorporating portions of routes 9 and 19, to extend from Fontana to Yucaipa and back.	Route to be rebuilt, lengthened, consolidate elements of routes 9 and 19. Will add 2 buses to weekday service.
22	Larger turnaround loop at southern EOL of route eliminated to reduce duplicated service.	Slight change in alignment to shorten EOL terminus to Arrowhead Regional Medical Center.
63	Route proposed to align more directly along Mountain, where there are more riders (in effect, covers a portion of Route 67)	Realignment along Mountain; adds 1 bus to service.
65	Numerous alignment changes and frequency changes; elimination of redundant service; better service along Central Avenue; aligns frequency better with ridership demand.	Adds 4 buses to weekday service; increases weekday frequency. Adds one bus each day on weekends. New alignment to make route more productive and efficient.
67	Proposed to shorten route to end at Chaffey College; alignment will have better EOL with higher ridership.	Saves 1 bus; no change in frequency, but shorter route spatially. Connects Fontana to Chaffey College with direct service.
68	Route realigned to better meet ridership needs; lower ridership-demand Ramona Avenue section now has lower but more appropriate frequency. Frequency reduced from 30 minutes to 60 minutes on weekdays, number of buses saved.	Saves 1 bus each on Saturdays and Sundays; saves five buses on weekdays; frequency reduced on weekdays.
80	Realignment on western portion of route removes redundant service from Holt westward, makes route more efficient. New end of line at Ontario Civic Center Transfer Station.	Realignment saves 1 bus weekdays.
81	Route will be realigned to incorporate elements of routes 81 and 82; route made less circuitous and more direct; efficiency increased, frequency not changed.	Change in length and alignment of route; no change in frequency or number of buses.
82	Route shortened and realigned from Commerce to Milliken; EOL expanded to turnaround serving Victoria Gardens directly (replaces route 81 there).	Route realigned; adds 1 bus on weekdays; no frequency changes.
83	Route realigned to reduce number of turns in southern part, is made straighter and more efficient, and better serves Chaffey College Chino campus.	Realignment, but no change in bus number or in frequency of service.
84	New weekday route proposed incorporating elements of the old Route 81 (which will not remain with that more streamlined alignment) and Route 63.	New route to cover what was shed from Routes 81 and 63; requires adding 2 buses on weekdays.

Exhibit 157: Proposed Frequency Changes

ROUTE	PROPOSED SERVICE CHANGE (Frequency)	EFFECT
3	Increase frequency from 15/20 minute to 15 minute service	Add 1 bus to service; Frequency increase
4	Increase frequency from 15/20 minute to 15 minute service	Add 1 bus to service; Frequency increase
20	Due to poorest performance of all fixed routes, proposed to reduce frequency from 30 minutes to 60 minutes.	Saves 1 bus and reduces frequency
215	Frequency increased for weekends from 60 minute to 30 minute service to meet rider demand.	Change in frequency on weekends adds one bus on Saturdays and Sundays.

13.2.1 Title VI Compliance of Routes Prior to Proposed Changes

Low-Income / Minority (LIM) and Minority proportions for populations associated with all routes were determined for each fixed route during the last Title VI update. This determination was done as part of the 2012 Title VI Triennial update, or shortly subsequent to that, as the route came into being, e.g., Route 310 in Yucaipa and the new sbX (both determined on or before 2013, the sbX route determined as part of the Service Equity analysis performed in the fall of 2013 and approved by the Board in January of 2014, six months prior to start of full revenue service). The determination was accomplished by analysis of the demographic character of the region(s) within the one-half mile pedestrian buffers surrounding each route. In doing so, the demographic character of each route was determined, and could be compared to that of the service area as a whole, and to what changes would be proposed to the individual routes in the future. Exhibit 158 shows both the minority and the LIM proportion of the population by route.

13.2.2 Analysis of Route Demographics I: Lost Service

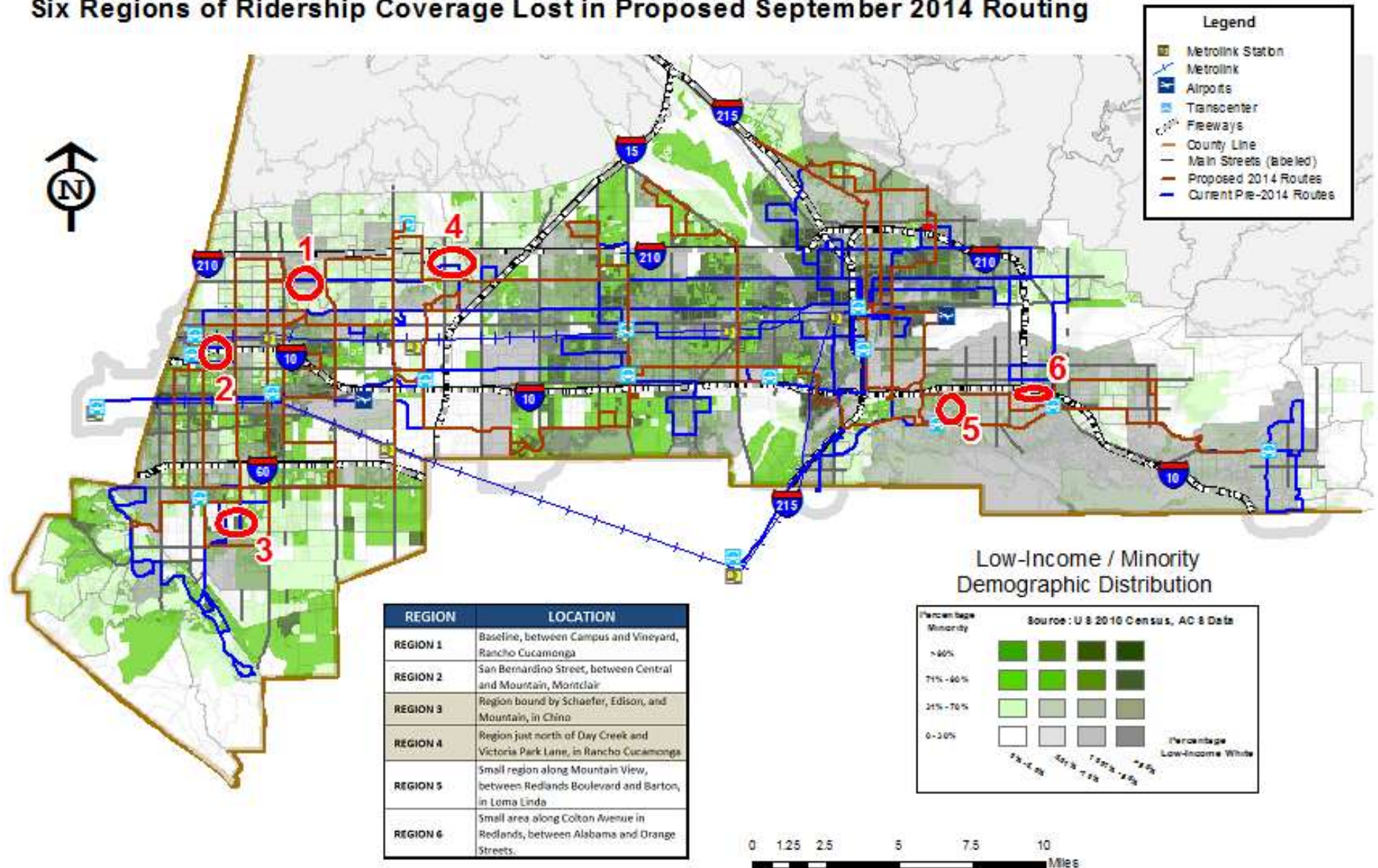
The proposed changes to the fixed routes do not appreciably change the basic contours or expanse of the service area overall. Even though there is some consolidating of routes, there are very few areas that are overtly affected in the sense that they have entirely lost service. Exhibit 159 shows those regions of the service area where route lines no longer run along streets they had previously. There are a total of only six regions in Omnitrans' service area which have had a section of route removed, and they are numerically identified and circled in red. Of these six regions, two (Regions 5 and 6) are covered by at least one other fixed route at a one-half mile pedestrian distance, and so they do not lose service; the removal of a section of route in these cases does not constitute lost service. However, Regions 1 through 4 are not covered by at least one fixed route at a one-half mile pedestrian distance. As such, only those four areas need to be addressed in terms of lost service.

Exhibit 158: Low-Income/Minority (LIM) Determination by Route

Region:	% Minority	Percentage LIM
Countywide	66.7%	70.0%
Omnitrans' Service Area	75.5%	77.6%
1	86.7%	90.0%
2	77.4%	81.4%
3	83.7%	87.9%
4	83.7%	87.9%
5	79.7%	83.8%
7	76.1%	79.0%
8	63.7%	67.1%
9	58.2%	61.2%
10	90.9%	92.2%
11	88.6%	90.9%
14	89.8%	91.7%
15	82.4%	84.6%
19	80.7%	82.9%
20	90.5%	92.0%
22	86.3%	87.6%
29	84.8%	87.4%
61	88.2%	89.8%
63	80.1%	81.4%
65	78.8%	80.2%
66	72.7%	75.0%
67	66.7%	68.4%
68	72.4%	74.5%
80	72.1%	74.0%
81	73.2%	74.7%
82	84.0%	84.5%
83	73.6%	74.4%
215	82.0%	83.9%
308/309	37.6%	39.2%
310	35.0%	37.5%
325	64.2%	66.8%
365	71.9%	73.3%
sbX (Green Line)	76.1%	79.1%

Exhibit 159 : Regions with Service Reductions

Six Regions of Ridership Coverage Lost in Proposed September 2014 Routing



In these cases, all but one falls below the threshold for Title VI. This would be Region 2, where the realignment of Route 80 affects Palo Verde Street in Montclair; in this case, the realignment away from Palo Verde is warranted because the new alignment seeks to eliminate redundancy from Holt Boulevard to the Montclair Transit Center (MTC) along a section of Route 80 which has never consistently met service standards for ridership or farebox recovery. Realignment offers a new and long-requested way to connect riders in Ontario with the important trip generator at Chaffey College. As the proportion of minorities within this region is

74.8%, and that within Omnitrans' service area is 75.5%, this realignment does not impose either disparate treatment or disparate impact.

Analysis in depth of the four identified regions follows.

BASELINE SECTION Baseline Between Campus and Vineyard

This section is found along a short stretch of Baseline between Campus on the west (served by Routes 63 and 83) and Vineyard / Carnelian on the east (served by Route 80—see the region in dashed yellow outline in Exhibit 161). This section will be lost due to the shortening of Route 67 and

Exhibit 161: Baseline between Campus & Vineyard

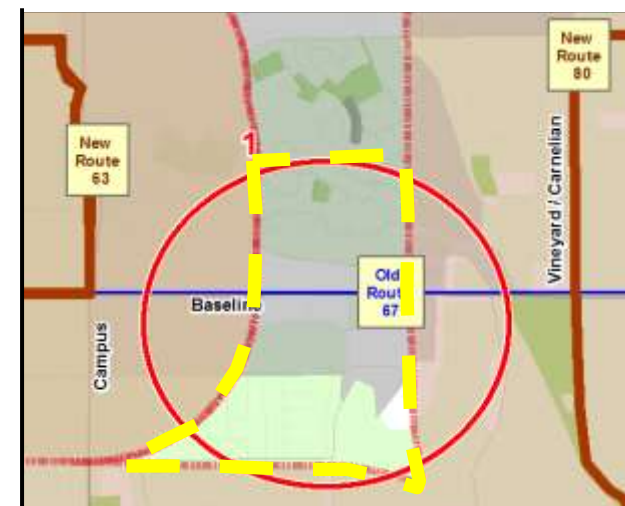


Exhibit 160: Analysis of Lost Sections within the 2014 Service Area

REGION	ROUTE SECTION LOST Within 1/2-Mile Pedestrian Buffer	Total Population	Total Whites (Tot Pop - Minorities)	Low Income Whites	Minorities	% Minorities	Total LIM	% LIW of LIM	% LIM
COUNTYWIDE		2,035,210	677,598	67,850	1,357,612	66.7%	1,425,462	4.8%	70.0%
Omnitrans' Service Area (One-half Mile of Any Fixed Route Service)		1,253,669	307,119	26,669	946,550	75.5%	973,219	2.7%	77.6%
1	BASELINE SECTION, RANCHO CUCAMONGA	5,231	2,877	248	2,354	45.0%	2,602	9.5%	49.7%
2	PALO VERDE STREET, 7th STREET; MONTCLAIR	4,695	1,183	202	3,512	74.8%	3,714	5.4%	79.1%
3	SCHAEFER, EDISON, MOUNTAIN AREA, CHINO	6,294	1,996	83	4,298	68.3%	4,381	1.9%	69.6%
4	NORTH OF DAY CREEK AND VICTORIA PARK, RANCHO CUCAMONGA	4,349	1,885	18	2,464	56.7%	2,482	0.7%	57.1%

other routes' realignment. However, the percentage of minorities living in this area is 45% which is well below the proportion for our service area (75.5%). This realignment does not impose disparate treatment or disparate impact.

► **BETWEEN PALO VERDE AND 7th STREETS**
Section between Palo Verde/5th Street and 7th Street, Montclair.

Exhibit 162: Region between Palo Verde and 7th Streets



This section, which lies between Central on the West and Mountain on the East (see dashed yellow outline in Exhibit 162), is an area marked by the corner of Central Ave. and San Bernardino Street, and the half-mile pedestrian walking distance which extends north-easterly from this corner up to and just north of the I-10 Freeway. Service from the old Route 80 was realigned here.

Route 80 has not met standards for a significant period of time (ridership in terms of passengers per hour has not met standard for a year, and farebox recovery ratio for the route has not met

standard for two years). Realignment of this route seeks to improve route performance in order to meet these standards, and offers a new way to connect riders in Ontario with Chaffey College, which is something that riders have requested for a long time. As the proportion of minorities within this region is 74.8%, and that within Omnitrans' service area is 75.5%, this realignment does not impose either disparate treatment or disparate impact.

► **SCHAEFER, EDISON, and MOUNTAIN STREETS SECTION** Along a section of these three streets in Chino.

Exhibit 163: Schaefer, Edison, and Mountain Streets



This section is found in the interior region defined by the streets of Schaefer, Mountain, Edison, and Oaks, and bound outside of that by the half-mile pedestrian walking areas around the routes 63 and 83 (see dashed yellow outline in Exhibit 163). A roughly 1.25 x 0.5 mile (0.63 square mile) area in

this interior faces a service reduction with the new route alignments. This region is marked by 68.3% minority residents, which falls under the proportions for our service area overall of 75.5% minority. The new alignment does not impose disparate treatment or disparate impact.

► **NORTH OF DAY CREEK AND VICTORIA PARK, RANCHO CUCAMONGA** A section bounded by Victoria Park (south) and the 210 Freeway (north).

Exhibit 164: Day Creek and Victoria Park



This area lies roughly south of the 210 freeway and north of Victoria Park Lane in Rancho Cucamonga, and before the realignment of Route 81, was part of that route's former half-mile pedestrian walking area which is no longer covered by the half-mile walking area associated with the new Route 67 (see dashed yellow outline in Exhibit 164). In this area, the percentage of

residents which are minorities is 56.7%; this is below that of our service area, which is 75.5% minority. This realignment does not impose disparate treatment or disparate impact.

13.2.3 Analysis of Route Demographics II: Frequency of Service Changes

OmniConnects realigns Routes 65 and 68 both in terms of route map and service frequency. The goal of the alignment is to match the highest performing parts of these partially parallel routes with the higher frequency service and the lower performing parts with the lower frequency service. In doing so the routes combined will perform better compared to standard and improve service for the slightly more minority populated region.

Route 68 will have service frequency reduced from 30-minute to 60-minute service along Ramona Avenue. The resources from Route 68 are transferred to Route 65 along the parallel Central Avenue, which will have its frequency increased to 30-minute service from 60-minute. For the stretch along Central Avenue there has been much higher ridership than along Ramona, and this is recognized by increasing frequency of service from 60-minutes to 30-minutes for this route. These

two stretches (Ramona and Central) do not have appreciably different demographic profiles in terms of minority or LIM residents. As well, their percentages of minority or LIM residents are greater than that for Omnitrans' service area as a whole, as shown in Exhibit 165. The only thing that changes is their frequencies of service, which are simply switched with each other's. This realignment and frequency change does not impose disparate treatment or disparate impact, as respective minority shares are essentially identical (see also Exhibit 172).

Four additional routes will have frequencies changed without accompanying realignment. Routes 3 and 4 (converses of each other—they are the same route run clockwise and counterclockwise) will have their frequencies increased. Route 3/4 minority share is 83.7% and its LIM share is 87.9%, both shares of which are greater than the same measures for either the County as a whole or Omnitrans' service area. The increase in service advantageously improves service offering for this predominantly LIM community.

Route 215 will have its weekend frequency

increased as well to meet increasing ridership demand on weekends. The improvement is proposed because the route has more than 40 passengers per hour and for a freeway express route is occasionally exceeding its load factor standard of 1.0. The routes' proportion of minority residents within one-half mile buffer is 82.0%, and its LIM proportion is 83.9%, both of which exceed what is found for both the County as a whole and for Omnitrans' service area; as a result, increasing service frequency is, in fact, a boon for the higher minority resident base served by this route.

The only one of the four routes whose frequency will be reduced from 30-minute to 60-minute service will be Route 20. This route's demographic profile (90.5% minority and 92% LIM) represents a greater percentage of both minority and LIM residents than that found overall in Omnitrans' service area. As such, this frequency change was carefully evaluated within the Title VI context.

The recommendation to reduce service on Route 20 is a direct result of years of low ridership. Route 20 is the poorest performing route in terms of passengers per hour of all 30-minute routes in Omnitrans' service area, and has been for a long

Exhibit 165: Analysis of Areas with Frequency Changes within the 2014 Service Area

REGION	ROUTE SECTION LOST Within 1/2-Mile Pedestrian Buffer	Total Population	Total Whites (Tot Pop - Minorities)	Low Income Whites	Minorities	% Minorities	Total LIM	% LIW of LIM	% LIM
COUNTYWIDE		2,035,210	677,598	67,850	1,357,612	66.7%	1,425,462	4.8%	70.0%
Omnitrans' Service Area (One-half Mile of Any Fixed Route Service)		1,253,669	307,119	26,669	946,550	75.5%	973,219	2.7%	77.6%
ALONG RAMONA		43,363	7,989	1,525	35,374	81.58%	36,899	4.13%	85.09%
ALONG CENTRAL		49,109	8,932	1,913	40,177	81.81%	42,090	4.55%	85.71%

time. The primary reason for this poor performance is the southern half of the route lies within the walking standard of Route 61, which is one of Omnitrans highest frequency and highest performing routes. Residents in the area are choosing to use Route 61, instead of waiting for the lower frequency Route 20. As a result, Omnitrans proposes to shift the resources from Route 20 to allow for the improvements to frequency on Route 3/4, which also serves a high LIM population but without as much service duplication.

With this said, the proposed change to Route 20 is not a route elimination as the riders will still be served. There is no disparate treatment as the same standards are applied to Route 20 as to other routes.

13.2.4 Analysis of Route Demographics III: New Service, Increased Frequency of Service

Accompanying the alignment and frequency changes for some routes, there will be additions made to four specific sections of Omnitrans' service area. Four regions were identified wherein Omnitrans gains service coverage by realignments; these were a result of the overarching strategy to increase and modify long-requested north-to-

south corridor service to feed into the successful east-west running routes 61, 66, and 67, all in the West Valley.

In all cases, residents had either requested new routing, or demographic and/or ridership data suggested a local need, or there was an unmet need in connecting riders to a new major trip generator, or there was a noticeable gap in service along a corridor which could be fixed by reducing

Exhibit 166: Regions of Ridership Coverage Gained in 2014 Service Area

Four Regions of Ridership Coverage Gained in Proposed September 2014 Routing

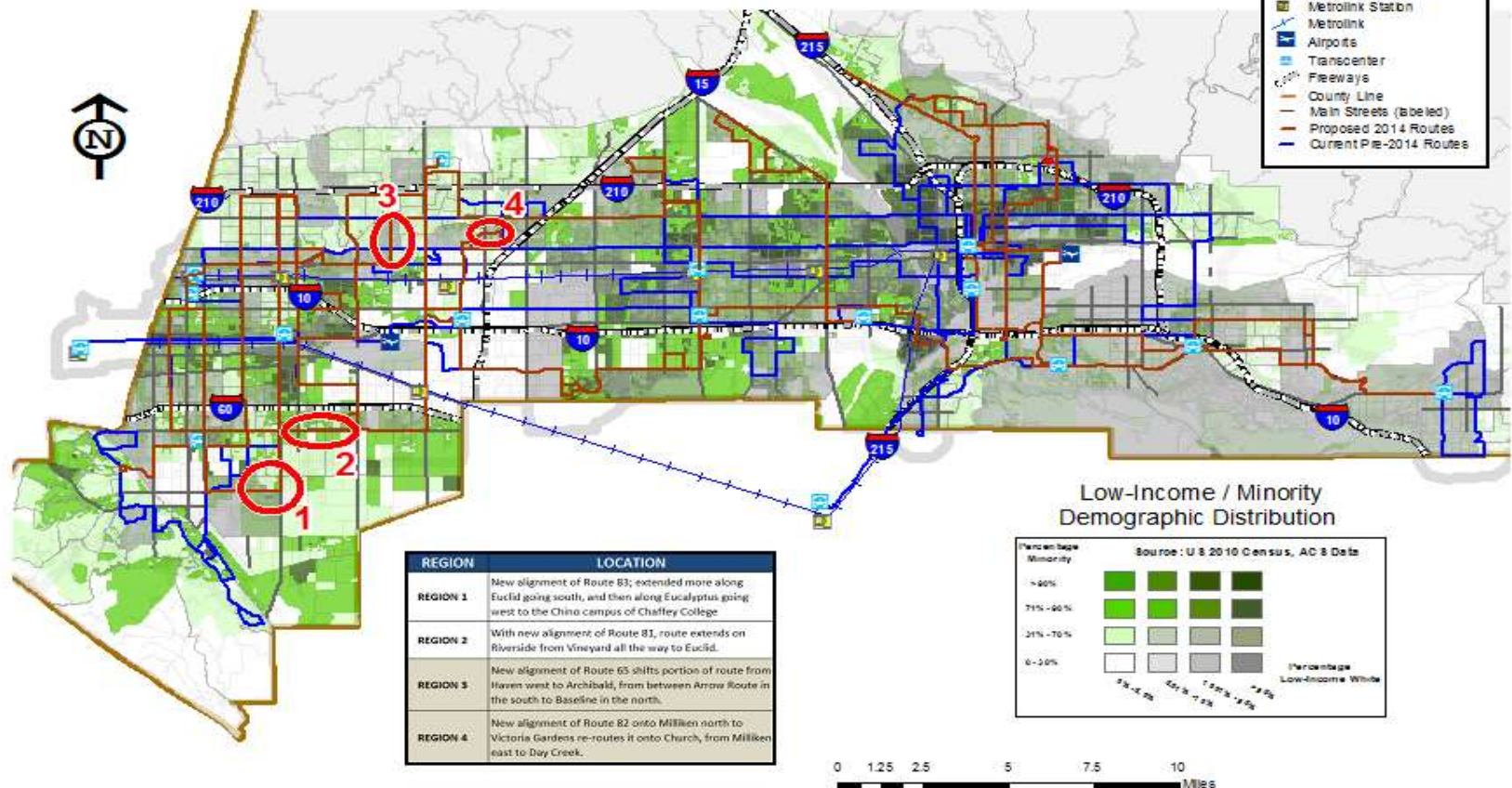


Exhibit 167: Demographic Analysis of Regions Gained in 2014 Service Area

REGION	ROUTE SECTION GAINED Within 1/2-Mile Pedestrian Buffer	ROUTE EFFECT ED	Total Population	Total Whites (Tot Pop - Minorities)	Low Income Whites	Minorities	% Minorities	Total LIM	% LIW of LIM	% LIM
COUNTYWIDE		NA	2,035,210	677,598	67,850	1,357,612	66.7%	1,425,462	4.8%	70.0%
Omnitrans' Service Area (One-half Mile of Any Fixed Route Service)		ALL	1,253,669	307,119	26,669	946,550	75.5%	973,219	2.7%	77.6%
1	ALONG EUCLID AND EUCALYPTUS, CHINO	83	4,216	1,115	127	3,101	73.6%	3,228	3.9%	76.6%
2	RIVERSIDE DRIVE, FROM VINEYARD TO EUCLID, SOUTHERN ONTARIO to CHINO	81	6,191	1,682	75	4,509	72.8%	4,584	1.6%	74.0%
3	ALONG ARCHIBALD FROM ARROW TO BASELINE, RANCHO CUCAMONGA	65	17,309	7,401	677	9,908	57.2%	10,585	6.4%	61.2%
4	ALONG CHURCH, FROM MILLIKEN TO DAY CREEK, RANCHO CUCAMONGA	82	5,105	1,784	43	3,321	65.1%	3,364	1.3%	65.9%
COMPARATIVE ROUTE BUFFER DEMOGRAPHICS										
1	ROUTE 83		89,510	23,660	764	65,850	73.6%	66,614	1.1%	74.4%
2	ROUTE 81		93,418	25,005	1,405	68,413	73.2%	69,818	2.0%	74.7%
3	ROUTE 65		52,472	11,099	693	41,373	78.8%	42,066	1.6%	80.2%
4	ROUTE 82		96,228	15,442	486	80,786	84.0%	81,272	0.6%	84.5%

redundant service along adjacent corridors. In cases such as these, the areas served may have lower proportions of minority residents which have already been served by the route being realigned. As such, demographic comparisons in these cases should be made to original route alignments and not to the service area overall.

The four gains made in service are shown in Exhibit 166. Exhibit 167 shows the demographic characteristics within ½ mile walking distance of the route before and after the proposed change,

compared to the overall service area and county. Owing to the fact that these are routes that have originally served portions of our service area which have lower proportions of minority residents, comparisons are made to pedestrian buffers about the original route as well, as seen in Exhibit 167.

The differences between route minority demographics are illustrated in the following table (Exhibit 168), where the demographic makeup of the cities the routes fall within is shown. These data illustrate an important point: namely, that

different cities have different minority shares, and the routes that serve them must also share those respective demographic characteristics. For this reason, it is important not always to compare the demographics of a proposed change to that of the service area, but to the demographic character of the region the route originally served, as shown in Exhibit 168.

Exhibit 168: Proportion and Number of Minorities in Omnitrans' Service Area by City

CITY	Total 2010 Population	Number "White, Non-Hispanic"	Percentage "White, Non-Hispanic"	Proportion (%) Minority	Number Minority
Chino	78,000	21,684	27.8%	72.2%	56,316
Chino Hills	75,000	25,050	33.4%	66.6%	49,950
Colton	52,000	6,760	13.0%	87.0%	45,240
Fontana	196,000	30,184	15.4%	84.6%	165,816
Grand Terrace	12,000	5,568	46.4%	53.6%	6,432
Highland	53,000	16,324	30.8%	69.2%	36,676
Loma Linda	23,000	8,510	37.0%	63.0%	14,490
Montclair	37,000	5,328	14.4%	85.6%	31,672
Ontario	164,000	29,848	18.2%	81.8%	134,152
Rancho Cucamonga	165,000	70,455	42.7%	57.3%	94,545
Redlands	69,000	37,260	54.0%	46.0%	31,740
Rialto	99,000	12,474	12.6%	87.4%	86,526
San Bernardino	210,000	39,900	19.0%	81.0%	170,100
Upland	74,000	32,708	44.2%	55.8%	41,292
Yucaipa	51,000	33,609	65.9%	34.1%	17,391
Average or SUM	1,358,000	375,662	27.7%	72.3%	982,338
Contribution of Unincorporated Areas	126,000	41,202	32.7%	67.3%	84,798
Base Population for Service Area	1,484,000	416,864	28.1%	71.9%	1,067,136
SAN BERNARDINO COUNTY (2011)	2,035,000	665,445	32.7%	67.3%	1,369,555

* NOTE: These data are derived with consideration of Whites, Not Hispanic numbers. These are the **true** minority count and proportion data.

Minority, then, is defined as total population minus "White Alone (not Hispanic or Latino)". By default, all not "white alone" equal "minority".

Data obtained for county and by city from State and County QuickFacts, U.S. Census Bureau online

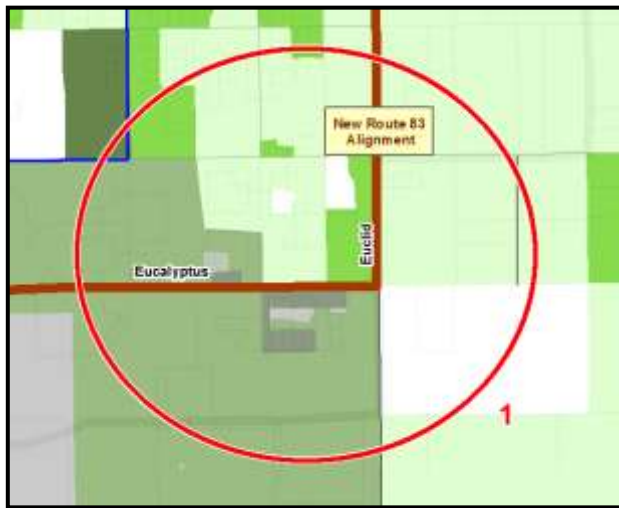
(<http://quickfacts.census.gov/qfd/states/06/06071.html>); data is for the years 2010 or 2011.

Exhibit 169: Along Riverside Drive from Euclid to Vineyard

The four regions are examined in detail, following:

- ▶ **ALONG EUCLID AND EUCALYPTUS, CHINO**
New alignment of Route 83, extended more along Euclid going south, and then along Eucalyptus going west to the Chino campus of Chaffey College.

Exhibit 170: Along Euclid and Eucalyptus



This alignment makes the route more efficient, as it reduces unnecessary turns (Exhibit 170). It serves much the same area outside of the Chino campus of Chaffey College, and utilizes the newly opened section of Eucalyptus (College Parkway) which was built to serve the campus itself. The demographics of this region do not greatly differ from those of the original alignment of Route 83 (73.6% minority to 73.6% minority). This realignment does not impose disparate treatment or disparate impact.

- ▶ **RIVERSIDE, FROM VINEYARD TO EUCLID, SOUTHERN ONTARIO to CHINO** Extends route on Riverside Drive from Vineyard to Euclid.



With this new alignment of part of old Route 81 (which is renamed the new Route 84), the route extends along Riverside Drive from Vineyard all the way to Euclid and makes a more direct connection that did not exist before (see Exhibit 169). The demographics of this buffer region do not greatly differ from that which existed for the route (Route 81, that is) before realignment and creation of the new Route 84 (72.8% minority in the new area versus 73.2% for the buffer around the old Route 81). This realignment does not impose disparate treatment or disparate impact.

- ▶ **ALONG ARCHIBALD FROM ARROW TO BASELINE, RANCHO CUCAMONGA** New alignment of Route 65 shifts a portion of route from Haven to Archibald, from between Arrow Route in the south to Baseline in the north.

Exhibit 171: Archibald from Arrow to Baseline



The demographic character of this route differs significantly from the old Route 65, but this is due to the fact that the new alignment of the route incorporates large chunks of other routes, too (Exhibit 171). A direct comparison here of the new alignment of Route 65 to the old Route 65 alignment is not entirely fair, as the route has undergone extensive change—so much so, that it is almost of a different demographic character from the old route.

The original route 65 remained in Chino and Montclair primarily, and did not venture north of

the Montclair Transit Center. In its new iteration, the latest alignment nearly doubles the route's length, and extends it farther north into cities which have very different demographics. As such, a fairer comparison might be to routes that serve Upland and Rancho Cucamonga more. Furthermore, the alignment along this section of Archibald was to remedy a different sort of situation: both Vineyard and Haven have other routes traversing them, and in order to connect to Chaffey College (the major end-of-line trip generator), the route would have to traverse either of those thoroughfares, or along Archibald, which was not being served at all.

By designing the alignment to traverse along Archibald, any unmet need is served, albeit for a portion of the community with greater numbers of low-income white (and fewer minority) residents. Vineyard and Haven remain served by other routes, an unmet need is resolved, and redundancy of service (especially along Haven) is reduced. In terms of demographic comparisons, Rancho Cucamonga has 57.3% minority, while within the buffer region of this section of Route 65, there are 57.2% minorities, which is essentially indistinguishable from Rancho Cucamonga overall.

A further comparison can be made between pedestrian buffers about the old combination of

routes 65 and 68 versus the new combination of routes 65 and 68; this was done, and the results determined that there was essentially no difference demographically between the old and new pedestrian buffers, as shown in Exhibit 172:

As can be seen, both buffers have 73.1% minority. Therefore, this realignment does not impose disparate treatment or disparate impact.

- ▶ **ALONG CHURCH, FROM MILLIKEN TO DAY CREEK, RANCHO CUCAMONGA** New alignment of Route 82 onto Milliken north to Victoria Gardens to better serve the environs around this trip generator.

Exhibit 173: New Victoria Gardens Routing



For a long time, better service to Victoria Gardens had been requested by riders. This alignment of Route 82 onto Milliken north to Victoria Gardens re-routes it onto Church, from Milliken east to Day Creek, and seeks to address that long unmet need: namely, serving Victoria Gardens directly, and directing ridership to this important trip generator

Exhibit 172: Demographic Analysis of Pedestrian Buffers for Old and New Routes 65 and 68

ROUTE SECTION GAINED Within 1/2-Mile Pedestrian Buffer	Total Population	Total Whites (Tot Pop - Minorities)	Low Income Whites	Minorities	% Minorities	Total LIM	% LIW of LIM	% LIM
OLD Buffer 1	152,910	41,138	4,348	111,772	73.1%	116,120	3.7%	75.9%
NEW Buffer 2	152,576	41,065	4,340	111,511	73.1%	115,851	3.7%	75.9%

(Exhibit 173). It is true that the demographic profile of this new section is not in character with historical Route 82, but it is in keeping with the demographics of this portion of the city of Rancho Cucamonga, and it is to this that demographic comparisons should be made. Rancho Cucamonga has 57.3% minority residents, while along this stretch of Church, there are 65.1% minorities. This new alignment does not impose either disparate treatment or disparate impact.

13.2.5 Analysis IV: Proposed Elimination of OmniLink Service

It is proposed to eliminate the curbside service known as OmniLink from the two communities it serves: Chino Hills and Yucaipa. In lieu of this, if the proposal is not passed, it is proposed to increase fares for OmniLink service for the same communities (this latter option was analyzed in the Fare Equity Analysis).

OmniLink has served the two communities of Chino Hills and Yucaipa for many years. However, it has always been a poor performer and an inefficient and expensive service to provide. In 2010, Omnitrans initiated a series of local circulator routes in these communities utilizing essentially the same smaller, cut-away type of transit vehicles and called OmniGo. Since then, OmniGo has grown to one route in Chino Hills (Route 365) and three routes in Yucaipa (308, 309, and 310), as well as one route serving the community of Grand Terrace (Route 325). In the last several years, OmniGo has continued to grow and to have increasing ridership, and is now consistently performing better than OmniLink service, while OmniLink remains one of the most expensive of Omnitrans' services. By eliminating

the cost-ineffective service of OmniLink, Omnitrans can better offer these resources into expansion of OmniGo to serve these communities. Demographic analysis of the cities of Chino Hills and Yucaipa (see Exhibit 155) demonstrates that neither city exceeds or even equals the proportion of minority or LIM residents for that of the County overall or for Omnitrans' service area. Elimination of OmniLink, therefore, does not impose disparate treatment or disparate impact.

Veterans' Fare Discount Equity Analysis, implemented on January 5, 2015.

ITEM # F2

DATE: October 1, 2014

TO: Board Chair Alan Wapner and Members of the Omnitrans Board of Directors

THROUGH: P. Scott Graham, CEO/General Manager

FROM: Wendy Williams, Director of Marketing and Planning

SUBJECT: VETERANS FARES & UNIFORMED PUBLIC SAFETY FARES

FORM MOTION

Adopt a new half-fare discount for Veterans and a new free fare for Uniformed Public Safety Officers and Active Duty Military effective January 5, 2015 as a modification to the fare policy previously adopted in the OmniConnects FY2015-2020 Short-Range Transit Plan in May 2014.

BACKGROUND

On August 6, 2014, Omnitrans' Board of Directors authorized staff to develop a fare policy proposal for Veterans and Public Safety/Active Military fares. The Board also authorized staff to hold a public hearing on the fare proposal, which was held on September 17, 2014.

This memorandum contains the four required components to evaluate the fare change proposal:

1. Proposed Fare Policy
2. Cost Analysis
3. Public Hearing Results
4. Title VI Analysis

The fare policy recommendation has been developed based on policy in place at peer agencies. Omnitrans would bear an expected annual cost of \$23,000 per year, mostly in foregone revenue from the program and a startup cost of \$8,500 for programing, graphics and new customer information.

If the Board adopts this fare policy change, Veterans Fares and Uniformed Public Safety/Active Duty Military fares will be implemented on January 5, 2015 to coincide with the next scheduled service change. Additionally, to promote this proposed change, Omnitrans plans to offer a free ride day for Veterans on Veterans Day 2014, which is November 11, 2014.

PROPOSED FARE POLICY

The proposed Veterans Fare Policy is:

Veterans Fare

Omnitrans offers a half-fare for US Veterans on Fixed Route Buses including Local, Express, sbX & OmniGo. Access ADA Service is excluded. Veterans are required to show a valid Veterans ID card while boarding to receive discounted fare.

Omnitrans accepts the following ID cards as proof of Veteran Status:

- *County of San Bernardino Military Veteran ID Card;*
- *US Department of Veterans Affairs (VA) ID Card;*
- *Department of Defense Retired ID Card; and,*
- *Other Transit Agency Veterans ID Cards.*

Omnitrans recommends the use of the County of San Bernardino Military Veteran ID Card as the primary identification to be used by Omnitrans. This card is available to qualified veterans free of charge and requires the same proof of qualification that Omnitrans was considering. The use of this card avoids duplication of services and helps Omnitrans partner with others in the County of San Bernardino's Veteran-Friendly Business program.

The proposed fare table for Fixed Route service is:

	Full-Fare	Youth	Senior Disability Medicare	Veteran
Cash/Ticket Fares	\$1.75	n/a	\$0.75	\$0.75
Day Passes (Single)	\$5.00	n/a	\$2.25	\$2.25
Day Passes (10-Pack)	\$45.00	n/a	\$20.00	\$20.00
7-Day Passes	\$18.00	\$14.00	\$8.00	\$8.00
31-Day Passes	\$55.00	\$41.00	\$27.50	\$27.50

The proposed Uniformed Police, Fire and Active Duty Military fare is:

Police, Fire and Active Duty Military Fare

Omnitrans offers a free fare on any Omnitrans fixed route bus service for uniformed active duty military, police or fire personnel. Access ADA Service is excluded.

- *Active duty military personnel must wear the appropriate uniform at the time of boarding and present a valid U.S. Uniformed Services ID card indicating active service or a Common Access card indicating uniformed services or active duty.*
- *Police and fire personnel must be in full Class A uniform at the time of boarding.*

COST ANALYSIS

The costs analysis below was provided in the August 6, 2014 Omnitrans Board of Directors Memorandum, at which time staff was authorized to develop a fare proposal. It is reproduced here with the removal of ID card processing, as the policy is now being considered for implementation. The primary cost of offering a discounted veterans fare is forgone revenue. There are some small additional costs associated with setting up a Veterans Fare. These costs and foregone revenue are estimated in Exhibit 1 as annual reoccurring costs and one-time setup costs.

The cost analysis is based on:

- 79,000 veterans living in our service area (5.8% of the population);
- 48% of these veterans already being qualified for a discounted fare which implies there are 41,000 local veterans that could financially benefit from this program and 38,000 veterans that already qualify for a discount through another program;
- Riverside Transit Agency's (RTA's) experience of offering 14,000 Veteran trips from January to June 2014; an average of 2,300 trips per month and 0.3% of RTA fixed route ridership; and,
- Measure I currently funds a \$0.05-\$0.10 per trip fare subsidy on Senior & Disabled trips that may not apply to Veteran trips.

Maximum annual costs are based on the Veterans share of population and the revenue in the category. Expected annual costs are based on RTA's experience scaled by the relative boardings at Omnitrans compared to RTA.

Exhibit 1: Projected Veterans Half-Fare Costs

Type (Description)	One-Time Costs	Maximum Annual Costs	Expected Annual Costs
Forgone Revenue (Currently using S/D, potential lost Measure I fare subsidy) ¹	--	\$34,000	\$2,000
Forgone Revenue (Currently using full fare passes) ²	--	\$256,000	\$20,000
Veterans Fare Media	--	\$1,000	\$1,000
Printing: Customer Information, Forms, Decals, etc.	\$5,000	--	--
GFI Programming: Bus pass encoding	\$1,000	--	--
GFI Programming: Ticket Vending Machines	\$2,500	--	--
Sub Total	\$8,500	\$291,000	\$23,000

¹ 16% of the Senior and Disabled population in Omnitrans service area are veterans. Omnitrans receives \$213,000 in Measure I Fare Subsidy. 16% of that may be forgone if a standalone Veteran category is created.

² Of the 1.4 million population in Omnitrans Service Area, approximately 925,000 would pay full-fare rather than youth or Senior/Disabled. Of these, 41,000 are veterans (4.5%).

The difference between maximum annual cost and expected annual costs is large. The primary difference between the two is the assumption that all veterans become quickly informed and immediately switch to the new veterans category. The other assumption is that the veteran ridership share of full fare trips is the same as the veteran share of the full-fare paying population. At RTA, only 0.3% of trips during the last six months have been on a veteran fare, while 8.9% of the population in the county are veterans.

Offering uniformed police officers, firefighters and active duty military with free travel on Omnitrans fixed route services is an effective way to improve customer satisfaction by improving perceived safety on board. While there are currently few, if any, uniformed officers that travel on Omnitrans today, the increase in services like sbX may persuade officers to travel. Ridership by a uniformed officer will pay for itself in terms of a passive security measure. The expected cost of public safety fares is minimal.

PUBLIC HEARING RESULTS

Omnitrans is required to hold a public hearing in order to gather public feedback on a major service change or any fare change. The Board of Directors authorized this public hearing on August 6, 2014.

The Notice of Public Hearing was advertised in the *San Bernardino Sun* on August 18, 2014 with the comment period ending on September 19, 2014. During September 2014, Omnitrans promoted the public hearing and gathered responses to the public hearing through a number of communication channels including: Omnitrans.Org; social media; e-newsletters; and in a presentation to the Public and Specialized Transportation Advisory and Coordination Council (PASTACC).

The formal public hearing was held on Wednesday September 17, 2014. One person attended; however, several people voiced their opinion through an online comment form, social media, letters and email. In total, 19 official comments were collected. Of these comments, 17 (89%) were in favor of Omnitrans adopting the proposed fare changes and 2 (11%) were opposed. There were 21 additional comments posted on Omnitrans blog and Facebook page, with a similar positive response. Omnitrans also polled drivers and received 37 responses, with 34 (92%) favorable responses.

All comments submitted are available upon request. The primary comment themes were:

- Veterans Fare is a good showing of appreciation for Veterans who often do not get the support and respect that they deserve.
- Veterans Fare helps reduce transportation issues as a key impediment to veterans receiving other services and/or seeking the help that they often need.
- Primary concern expressed related to the need for Active Duty Military, Police and Fire to be in uniform to receive free fare and the potential safety risk.

TITLE VI ANALYSIS

As a recipient of federal funds under the Federal Transit Administration's (FTA's) guidelines, Omnitrans is required to comply with Title VI of the Civil Rights Act of 1964. The FTA's current Title VI circular (FTA C 4702.1B) requires that a fare equity analysis be completed for any proposed change to ensure that the proposed change does not create a disparate treatment or disparate impact on low-income or minority populations.

Omnitrans is supportive of the veterans' community in the San Bernardino Valley and provides routes to key veteran destinations. Currently, Omnitrans does not offer a discounted fare to the active duty or retired members of our armed forces. Special veterans' fares are not currently a widespread discount, but the practice is gaining traction locally. Omnitrans believes that offering a veterans fare is fitting and justified as appreciation for the service that veterans have provided.

A Title VI determination does not address whether the agency has a right to offer a special fare, but whether the agency can do so in a fair and equitable manner that does not unfairly impact the minority or low income community. Even a benefit offered one group can impact others adversely if it incurs a significant cost which is transferred to low income or minority ridership.

An analysis made for the most recent Title VI triennial update found that 77.6% of residents within ½-mile of any Omnitrans route are considered Low-income or minority (LIM) which compares to 70.0% for San Bernardino County as a whole. The 77.6% LIM share for Omnitrans' service area becomes the baseline by which Omnitrans compares demographic equity.

The share of Veterans that are low-income or minority can be derived based on the American Community Survey (ACS) 2008 to 2012 5-year estimate. An evaluation was completed on Omnitrans service area and it was determined that 44.7% of veterans are low-income or minority. So the population of veterans drawn from our service area does not mirror that of the service area population as a whole. There are significantly fewer minority members per capita within the veteran population when compared to that of the proportion of minorities within Omnitrans' service area.

Looking at the veterans fare from a purely demographic perspective, the proposed Veterans' fare does favor a group that is not as minority- or low-income concentrated as the population as a whole. Thus it could be found that the fare reduction does favor the non-LIM community.

However, demographics are not the only criterion by which a proposed policy can be measured. Another is the necessity or overall good the policy brings about, and how much it will cost the agency as a whole, and whether or not these costs will unduly adversely impact the LIM population.

As has been shown, a cost does accrue to the agency as a result of the proposed fare change. The question is whether or not this cost is significant vis-à-vis the agency's annual budget, and whether or not that cost will be "passed along" to consumers in such a way that it unduly adversely impacts low income or minority ridership. It is estimated that the cost in terms of forgone revenue would be \$23,000 annually. As a result, the economic impact of favoring veterans with a reduced fare should be negligible to the agency as it accounts for only three-

hundredths of one percent of the annual operating budget. On balance, this is a cost which can be absorbed by the agency without negatively impacting the LIM community.

A proposed change to fare policy does not have to mirror or better the LIM proportion of an agency's service area *per se*, as long as there are compelling reasons for the proposed change, and as long as the change does not unduly adversely impact the LIM population. This is one of those situations: overall the expected fare reduction will not have an adverse impact on minority or low income populations in Omnitrans' Service Area.

CONCLUSION

Staff recommends that the Board of Directors adopt the proposed fare policy changes to the fare policy that was adopted in the OmniConnects 2015-2020 Short-Range Transit Plan. If adopted, staff will implement the change to fare policy at the next scheduled service change on January 5, 2015.

PSG:WW:JB

West Valley Service Changes; Route 290 introduced; SBTC opens. Service Equity Analysis completed in advance of September, 2015 for upcoming service changes.

7. TITLE VI SERVICE EQUITY ANALYSIS

Title VI of the Civil Rights Act of 1964 requires that public transit agencies do not impose disparate treatment or disparate impact upon low income or minority populations.

As part of Omnitrans' Title VI obligation, an equity analysis must be performed for major service and fare changes as part of the planning process. The analysis tests if the proposed changes unfairly impact the minority or low-income populations. Detailed service and fare equity analyses on the latest proposed routing changes were completed and presented in Chapter 13 of the OmniConnects FY2015-2020 Short Range Transit Plan (SRTP).

The FY16 Service Plan is the implementation of the second phase of OmniConnects' routing plan and as such has already been evaluated by a Title VI Analysis. However, since minor changes were made to the plan due to public feedback, an updated service equity analysis was completed.

The results in Exhibit 29 illustrate that Omnitrans' service area has a higher share of minorities and low income or minorities (LIM) than the county as a whole. Additionally, the results show that the minority population within ½-mile of Omnitrans proposed routing for September FY2016 the minority population grows from 75% to 76%. This data combined with the detailed analysis adopted within OmniConnects show that Omnitrans maintains compliance with Title VI with the implementation of this service change.

Exhibit 29: Minority and Low Income Share in Omnitrans Service Area, Sub Regions and San Bernardino County

REGION	% Minorities	% LIM
COUNTYWIDE	67%	73%
HALF MILE PEDESTRIAN BUFFERS		
Omnitrans' Entire Service Area Current	75%	78%
Omnitrans' Entire Service Area, Sept FY2016	76%	79%
EAST VALLEY		
FY2015 (Before)	79%	82%
FY2016 (After)	79%	82%
WEST VALLEY		
FY2015 (Before)	74%	77%
FY2016 (After)	74%	77%

In sum, after all route changes are proposed and implemented in the East and West Valleys, the end result is a negligible difference in proportion of minorities or Low Income / Minority (LIM) before and after the changes.

The FY2016 Service Plan revised Routes 67, 65 and 68 compared to the OmniConnects plan. Additionally, Routes 65 and 68 are being changed to 85 and 88, respectively. In the case of Route 67, the western-most EOL was changed from the Milliken approach to Chaffey College to the Archibald approach to Chaffey College. Although demographic analysis of this change showed that the new alignment served a population with lower minority resident proportion than the older alignment (69.4% minority versus 74.2% minority, respectively), the older Milliken

approach would be covered by the new Route 85, and thus Route 67's coverage was redundant. The new alignment eliminated redundancy of service, and permitted expanding ridership. Since the older Milliken approach to Chaffey College was already being served, the change did not impose disparate treatment or disparate impact.

As for the new Routes 85 and 88, it was found that further modification of the new iterations of Routes 65 and 68 were necessary to better and more efficiently serve the ridership of that portion of West Valley. By moving part of Route 65 from an EOL approach to Chaffey College on Haven to Milliken, it covered the lost approach due to realigning route 67, and the Haven approach would be covered in its turn by the new realignment of Route 67 to Archibald. The new alignment of 85 and 88 was virtually demographically indistinguishable from the minority resident makeup of old Routes 65 and 68 (73.2% minority versus 73.1% minority, respectively, and 76.0% versus 75.9% LIM, respectively). So the change does not impose disparate treatment or disparate impact.

Numerous route changes in East Valley are proposed so that routes currently serving the 4th Street Transfer Center will be able to serve the new San Bernardino Transit Center (SBTC) which will begin operating in September 2015. Owing to the fact that many of these routes experience either close proximity or overlap near where they converge in downtown San Bernardino, a realignment of these routes' termini near the SBTC results in much of the area remaining fully covered.

When the two half-mile pedestrian buffer regions are compared, the realignment of all routes around SBTC leads to nearly every portion of each buffer being covered by the other. Only two areas are found where there is very minimal difference between these two buffer regions; in the one region a small gap that was formerly not served by the original routing between Lena and 5th Streets and between Harry Sheppard and Central is now served by the new routing. In the second case, a small gap opens up in the new routing from east of Valencia to Tippecanoe and from Vine to 7th Streets in San Bernardino. When the two buffer regions are compared, the proportion of minority residents in each buffer regions are virtually identical (79.2% minority and 82.4% LIM, for each), and both have higher proportions of minority residents than either Omnitrans' entire service area or for San Bernardino County overall. So the changes do not impose disparate treatment or disparate impact.

In response to long customer demand, an additional peak hour freeway express route has been proposed. It will travel along the 10 freeway from SBTC to Montclair Transit Center. It will make 15 trips a day during morning and evening peak periods. A demographic analysis of the regions it serves shows that the percentage of minority residents falls below that of Omnitrans' service area as a whole (73.2% versus 75.5%, respectively), but surpasses that of the County (66.7%); when compared to West Valley's combined half-mile pedestrian buffer as a background, the proportion of minority residents is still less, but closer to compatibility (73.2% versus 74.4%). Introduction of this limited service express route does not impose disparate treatment or disparate impact.

Two route frequency changes are proposed:

1. Reducing frequency of service on Route 2 from 30 minutes to 60 minutes; and,

2. Increasing frequency of service on an expanded Route 1 to 15 minute service on all portions all day.

Route 2 serves exactly the same area that sbX Greenline serves, along exactly the same streets, and it is felt that redundant service should be reduced there in order to free up resources so as to increase service where there is high demand elsewhere.

sbX does serve fewer and more widely spaced stops along its length, but almost all of the stops are situated so that a pedestrian to walk in either direction half a mile to reach an sbX stop. As well, sbX runs at a ten-minute frequency all weekday long, and thus serves at a far higher frequency than Route 2.

Finally, the resources saved by reducing frequency on Route 2 will be applied to increase frequency on Route 1. Currently, Route 1 is divided into a short and long route; one serves at 15-minute frequency, and the other at 30-minute frequency. By extending Route 1 an extra block at its northern-most EOL to serve beyond Lynwood and Del Rosa to Lynwood and Sterling and by increasing frequency along the entire route to 15-minute frequency all day long, we increase and improve service to more riders. A demographic analysis of the half-mile pedestrian buffer associated with both routes (Route 2 and proposed new Route 1) shows that the proportion of minority residents per buffer actually increases (from 76.6% for Route 2 to 86.7% for new Route 1). Thus these changes do not result in disparate treatment or disparate impact.

The service equity analysis shows that Omnitrans' proposed service changes are compliant with Title VI requirements.

APPENDIX-I TITLE VI STATEMENT OF RIGHTS IN SEVEN LANGUAGES

Title VI of the Civil Rights Act of 1964

In accordance with Title VI Civil Rights Act of 1964, Omnitrans prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. To request information on procedures for filing a complaint or to notify Omnitrans of any perceived violation of the act, please contact Omnitrans Information at (800) 966-6428.

Título VI de la Ley de Derechos Civiles de 1964

De acuerdo con el Título VI de la Ley de Derechos Civiles de 1964, Omnitrans prohíbe cualquier tipo de discriminación en base a la raza, color y nacionalidad, en los programas y actividades que reciben subsidios nacionales. Para solicitar información acerca de los procedimientos para presentar una queja o para notificarle a Omnitrans sobre cualquier violación de dicha ley, contáctese al (800) 966-6428.

1964 年民权法案第 VI 条

根据 1964 年民权法案第 VI 条, Omnitrans 禁止在接受联邦财政资助的计划和活动中出现基于种族、肤色和民族血统的歧视。如需获取有关呈递诉状的程序信息, 或向 Omnitrans 报告察觉到的法案违反情况, 请通过 (800) 966-6428 联系 Omnitrans 信息部。

ចំណងជើងទី VI នៃច្បាប់ស្តីពីសិទ្ធិពលរដ្ឋឆ្នាំ 1964

យោងតាមចំណងជើងទី VI នៃច្បាប់ស្តីពីសិទ្ធិពលរដ្ឋឆ្នាំ 1964 ទីភ្នាក់ងារអូមនីត្រង់ស៍ (Omnitrans) ហាមឃាត់អំពើរើសអើងលើមូលដ្ឋានជាតិសាសន៍, ពណ៌សម្បុរ, និងសញ្ញាជាតិដល់មនុស្សក្នុងកម្មវិធី និងសកម្មភាពទទួលបានថវិកាហិរញ្ញវត្ថុចុះបន្ទាប់សហភាព។ ដើម្បីស្នើសុំព័ត៌មានអំពីនីតិវិធីសម្រាប់ការដាក់ពាក្យបណ្តឹង ឬដើម្បីជូនដំណឹងដល់ទីភ្នាក់ងារ Omnitrans អំពីការរំលោភបំពានច្បាប់តាមការចោទប្រកាន់ណាមួយ សូមមេត្តាទាក់ទងជូនព័ត៌មាននូវទីភ្នាក់ងារ Omnitrans តាមទូរសព្ទឆ្នាំលេខ (800) 966-6428។

Pamagat VI ng Batas sa Karapatang Panlipunan ng 1964

Ayon sa Pamagat VI ng Batas sa Karapatang Panlipunan ng 1964, pinagbabawalan ng Omnitrans ang diskriminasyon sa batayan ng lahi, kulay at pambansang pinagmulan sa mga programa at aktibidad na nakakatanggap ng pederal na pinansiyal na tulong. Upang humiling ng impormasyon sa mga pamamaraan sa pagsampa ng reklami o upang abisuhan ang Omnitrans ng anumang tilang paglabag ng batas, mangyaring makipag-ugnayan sa Impormasyon ng Omnitrans sa (800) 966-6428.

1964년 제정 공민권법 제4조

1964년 제정 공민권법 제4조에 따라 Omnitrans는 연방 재정 지원을 받는 프로그램과 활동에 있어 인종, 피부색 그리고 국적을 이유로 차별하는 것을 금지합니다. 불만 접수 절차에 대한 정보를 요청하거나 이 법에 대해 인지한 위반 사항을 Omnitrans에 통보하기 위해서는 전화 (800) 966-6428의 Omnitrans 정보센터로 연락하십시오.

الفقرة ٦ بشأن قانون الحقوق المدنية لعام ١٩٦٤ وفقاً للفقرة ٦ الخاصة بقانون الحقوق المدنية لعام ١٩٦٤، تحظر وكالة Omnitrans التمييز على أساس العرق، واللون، والأصل القومي في البرامج والأنشطة التي تتلقى مساعدة مالية وفيدرالية. ولتطلب المعلومات حول الإجراءات الخاصة بملء شكوى أو لإخطار وكالة Omnitrans بأي انتهاك ملحوظ للقانون، يُرجى الاتصال بمكتب الاستعلامات لوكالة Omnitrans على الرقم: ٩٦٦-٦٤٢٨ (٨٠٠).

Tiêu đề VI Đạo luật Dân quyền năm 1964

Theo Tiêu đề VI của Đạo luật Dân quyền năm 1964, Omnitrans ngăn cấm sự phân biệt chủng tộc, màu da và quốc gia xuất xứ trong các chương trình và hoạt động nhận sự hỗ trợ tài chính của liên bang. Để có thêm thông tin về quy trình gửi những phản nàn hoặc thông báo cho Omnitrans biết về sự vi phạm đạo luật Dân quyền, xin hãy liên hệ Bộ phận Thông tin Omnitrans theo số (800) 966-6428.



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APPENDIX-J OMNITRANS' LEP POLICY AND LAP PLAN

Omnitrans' LEP Policy and LAP Plan begin on the following page.

Omnitrans' Title VI Limited English Proficiency (LEP) Policy and Language Assistance Plan

Introduction

As a recipient of federal funding under the Federal Transit Administration's (FTA's) guidelines, Omnitrans is required to demonstrate that it does not discriminate against, exclude from, or deny service to individuals based on race, color, or national origin. The FTA requires that funding recipients develop a Language Assistance Plan that takes reasonable steps to ensure meaningful access to the benefits, services, information, and other important parts of its program for persons of Limited English Proficiency (LEP).

LEP persons are defined as persons for whom English is not their primary language and who have a limited ability to speak, understand, read, or write English. LEP persons include people who do not speak English at all and people who do not speak it well.

Omnitrans' LEP obligations stem from Section 601 of Title VI of the Civil Rights Act of 1964, and in the more recent FTA Circular 4702.1B.

Title VI states 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."*

In the FTA's current Title VI Circular, 4702.1B released in October 2012, the FTA clarifies that *national origin discrimination* refers as well to native language, or primary facility in *any language other than English*.

The LEP Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency (65 FR 50121, Aug. 11, 2000)" directs Federal Agencies to ensure that Federal recipients provide meaningful access to their LEP applicants and beneficiaries. Failure to do so may constitute national origin discrimination.

Four Factor Analysis

An effective LEP Policy Implementation and Language Assistance Plan starts by determining the languages spoken. Within those language groups, one must quantify the number of individuals who would qualify as LEP and those who would likely use the agency's services. This requires what is known as a Four Factor Analysis of numbers and proportions of LEP riders.

The Four Factor Analysis includes the following four determinations:

1. Factor 1: Determine the number and/or proportion of LEPs likely to be encountered by the program.
2. Factor 2: Determine the frequency of program contact with these LEPs (also known as the probability of interaction).
3. Factor 3: Determine the nature and importance of the agency's program to LEP members of the public.
4. Factor 4: Determine the resources available and costs to the program needed to implement a Language Assistance Plan.

The FTA Circular 4702.1B Safe Harbor provisions require that vital documents be translated into the primary language for each LEP group that meets a demographic threshold. Currently, the threshold for each LEP group is the presence of LEP speakers for that language at the level of 5% of the total service area population or 1,000 individuals, whichever measure is less.

In the provision's wording: "...if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally."

FACTOR 1

A number of studies were made and data pools analyzed in order to arrive at a better idea of what the linguistic makeup of LEP speakers is within Omnitrans' service area.

According to the Omnitrans' 2007 Attitude and Awareness Survey, the linguistic breakdown of Omnitrans' Service area is as follows. More than eight of every ten riders surveyed (87%) reported that English was the primary language spoken in their home. There was an overall significant increase in the number of riders who reported that a language other than English was spoken at home (Spanish 28%, Chinese 1%, Tagalog 1%, and "Other" 1%). More recently, the Omnitrans' 2011 Attitude and Awareness Study commissioned by Redhill Group determined that from more than 6,000 riders surveyed, 93% spoke English, and 7% spoke Spanish. According to these results, English is the predominant home language spoken in our service area, and Spanish is the second most prevalent language spoken at home.

More broadly, the US Census Department's American Community Survey, 5-year estimate for 2011 was used. An evaluation of Omnitrans' service area identified the total number of LEP languages in our service area as seven.

The LEP languages are: Spanish, Chinese, Korean, Vietnamese, Tagalog, Arabic, and Cambodian. Details can be seen in Exhibit 1.

Exhibit 1 Major Languages Spoken in Omnitrans' Service Area

	LANGUAGE	Number of Speakers Expected in COUNTY	Number of Speakers Expected in SERVICE AREA	Percentage of Total
	COUNTY Total:	1,863,503		100%
	Speak only English	1,101,971	877,554	59%
	Total Pop of Service Area		1,484,000	79.63%
	(From 2010 US Census)			
1	Spanish (or Spanish Creole):	629,421	501,239	34%
	Speak English less than "very well"	277,116	237,644	16%
2	Chinese (Mandarin, etc):	18,720	14,908	1%
	Speak English less than "very well"	9,878	9,216	1%
3	Korean:	10,656	8,486	1%
	Speak English less than "very well"	6,264	5,229	0%
4	Vietnamese:	10,050	8,003	1%
	Speak English less than "very well"	6,706	6,267	0%
5	Tagalog:	27,213	21,671	1%
	Speak English less than "very well"	6,767	5,943	0%
6	Arabic:	9,575	7,625	1%
	Speak English less than "very well"	3,444	3,070	0%
7	Cambodian	1,511	1,203	0.1%
	Speak English less than "very well"	1,497	1,192	0.1%
Taken from: Language Spoken at Home by Ability to Speak English,				
age 5 years or older (ACS American Community Survey, 2011 5-year estimate)				

FACTOR 2

Additional surveys attempted to look at the probability of interaction (Factor 2 of the Four Factor analysis) in order to get a different perspective on these LEP languages.

According to the San Bernardino County Office of Education, English Language Learner students at San Bernardino County public schools make up 19.9% of the entire student body population. This is not perfectly tantamount to a representation of the proportion of LEP within the county as a whole, but it is one consideration.

EDUCATIONAL SOURCES

Total students in San Bernardino County: 6,207,229 (2012)

(California Department of Finance demographic research unit)

Percentage of English Language Learners in San Bernardino County public schools: 19.9 % *

Data Source: California Dept. of Education, California Basic Educational Data System (CBEDS).
Accessed at <http://data1.cde.ca.gov/dataquest/> (Jul. 2013).

Exhibit 2 shows the results of a survey of Omnitrans' website hits from January 1 to September 30, 2013, as made possible by use of Google Analytics; the distribution of primary languages of visitors is as follows:

Exhibit 2 Languages Employed by Visitors to Omnitrans' Website

Breakdown of Languages of Visitors to Omnitrans' Website, January to September, 2013	
Primary Language of Visitor to Website	Proportion of All Visitors
English	98.58%
Spanish	0.81%
Chinese	0.14%
French	0.06%
Korean	0.05%
Portuguese	0.04%
German	0.03%
ALL OTHERS Summed	0.29%
TOTAL	100.00%
NOTE: There were no visits attributed to Vietnamese, Tagalog, or Cambodian languages	

In this informal assessment, less than one percent of those visiting the website used Spanish as their primary language; these outnumbered the next highest potential LEP language (Chinese) 5.75 to 1. The total proportion of all potential LEP language users visiting the website during this period is 1.42% of the total. Taken by itself, however, frequency of web-based technology use by language is an incomplete indicator of LEP pervasiveness and transit usage, and other means of assessment need to be utilized.

There are a number of cultural, community outreach, and support groups throughout Omnitrans' service area which address the needs of LEP populations. Their presence can serve as an ancillary indicator of LEP penetrance by language within the service area. More importantly, these are the types of groups Omnitrans reaches out to in order to better serve the needs of particular LEP populations. A list of such groups follows in Exhibit 3.

Exhibit 3 Examples of Community LEP Groups in Omnitrans' Service Area

EXAMPLES OF COMMUNITY LEP GROUPS IN OMNITRANS' SERVICE AREA FOR OUTREACH		
Community Resource Group		Contact Information
1	Loving Savior Chinese Christian Church	14816 Peyton Dr, Chino Hills, CA 91709-2073 (909) 597-5771
2	Temple of the Khmer Buddhist Society: Wat Bodhisovannaram	1595 Hard Street, San Bernardino, CA 92408 Phone: 909.796.6372
3	Temple of the Khmer Buddhist Society: Wat Padma Sovannaram	8677 Mulberry Avenue, Fontana, CA 92335 Phones: 909.887.3602, 909.428.1529
4	Vietnamese Weekly	525 N. Euclid Avenue, Ontario CA 91762 http://vietamerican.com/
5	Inland Chinese Association	http://www.inlandchineseassociation.com/index.html
6	Asian-American Resource Center	1115 South "E" Street, San Bernardino, CA 92408 Phone: (909) 383-0164 http://www.aarc-ie.org/index.html
7	Vietnamese Buddhist Youth Association	1838 West Baseline Street, San Bernardino, CA 92411
8	Filipino Visayan Church	Filipino Visayan Church, San Bernardino, CA 92407
9	Filipino Association of San Bernardino County	27124 Meines Street, Highland, CA 92346 (909) 862-6810
10	Filipino Ministry, Diocese of San Bernardino, California	Office of the Asian and Pacific Islander Ministry, 1201 E. Highland Ave., San Bernardino, CA 92404 (909) 983-2637 http://filiministry0.tripod.com/
11	Loma Linda Filipino Seventh-Day Adventist Church	11180 New Jersey Street, Redlands, CA 92372
12	Al-Shifa Clinic of San Bernardino	Al-Shifa Clinic, Inc. 2034-B Mallory Street, San Bernardino, CA 92407 (909) 473-0600 http://www.alshifafreeclinic.org/index.html
13	Islamic Community Center of Redlands	24769 Redlands Blvd. Suite A, Loma Linda, CA 92354 (909) 801-8081 http://www.iccredlands.org/
14	Loma Linda Korean Seventh-Day Adventist Church	12408 Mount Vernon Avenue, Grand Terrace, CA 92313 (909) 825-6947 http://lomalandakorean22.adventistchurchconnect.org/
15	Latino Health Collaborative	1800 Western Avenue, Suite 402 San Bernardino, CA 92411 (909) 887-0707 http://latinohealthca.org/
16	San Bernardino Community Services Center, Inc.	560 North Arrowhead Avenue, Suite 8A, San Bernardino, CA 92401 (909) 885-1992

Exhibit 4, following, describes proportions of LEP Spanish and LEP "other languages" groups in San Bernardino County which the US Census' American FactFinder site online and the ACS (American Community Survey) indicate correlate with propensity towards transit usage:

Exhibit 4 Sample of Language Usage and Public Transit Use Propensity

Language Usage and Public transportation Use (excluding taxicab):	San Bernardino County, California	
	Estimate	Percentage
Speak only English	8,581	1.07%
Speak Spanish:	5,338	0.67%
Speak English "very well"	2,250	0.28%
Speak English less than "very well"	3,088	0.39%
Speak other languages:	955	0.12%
Speak English "very well"	728	0.09%
Speak English less than "very well"	227	0.03%

These data indicate that although 16% of the total population of the county speak Spanish well and English less than "very well", and qualify as LEP, the proportion of the membership of this cohort which also uses public transit is much smaller, at only 0.39% of the total population. Between 16% and 0.39%, this translates to a roughly 40 to 1 difference. As for LEP for other languages besides Spanish, 2.7% of the population fits this category (of all LEP language speakers not including Spanish), but only 0.03% are both LEP other languages besides Spanish and use public transit; in this case, it is a 90

to 1 difference. According to these data, then, probability of interaction, or the frequency with which LEP individuals come into contact with Omnitrans' services, appears to be exceedingly low for LEP members who speak a language other than Spanish.

In order to investigate further the probability of interaction with LEP speakers, a survey was taken of Omnitrans' Information Clerks at Omnitrans' Call Center regarding the number and proportion of calls received in September of 2013. Results of this informal survey are shown in Exhibit 5 and seem to accord with a large difference in numbers between Spanish LEP language interactions and "other language" LEP interactions; 77.3% of all calls were in English, 20.3% were in Spanish, and only 2.4% were in some other language other than English or Spanish. In this group, the highest proportion was for Chinese, which was estimated to be 0.45% of all calls. This is nearly an order of magnitude difference in number between Spanish LEP callers and LEP callers of another language.

Exhibit 5 Languages Spoken by Callers to Omnitrans' Call Center

Languages Spoken by Callers to Omnitrans' Information / Call Center, per 1,000 Calls		
LANGUAGE SPOKEN	NUMBER of CALLS	PERCENT of ALL CALLS
English	773	77.30%
Spanish	203	20.30%
Chinese	5	0.45%
Korean	4	0.38%
Vietnamese	4	0.40%
Tagalog	5	0.50%
Arabic	4	0.38%
Cambodian	1	0.05%
Unknown	3	0.25%
TOTAL	1,000	100.0%
<i>Data taken from interviews with and data sheets collected from seven of Omnitrans' Information Clerks in Omnitrans' Call Center</i>		
<i>Data are estimates obtained from personal recollections and individuals' language identification stretching over a period as long as several months. Figures are based on 1,000 calls received per clerk.</i>		

A second survey was taken in September of 2013 of numbers of verbal interactions as reported by 112 coach operators with their ridership, as shown in Exhibit 5. For them to have been counted, these interactions had to take the form of more than a salutation, but of actual information transfer, or real requests for information on the part of a rider from the coach operator such that the operator was obliged to reply in some manner.

According to these data, 65.44% of all transactions were English, 32.4% were in Spanish, and 2.16% of all transactions were in some language other than English or Spanish. The highest proportion of these was from "Asian" (an unidentified Asian language) at 0.66%, and Chinese was at 0.44% of all transactions. It is important to

note that all other languages other than English or Spanish combined yielded 2.16%, which is less than an order of magnitude lower than Spanish transactions, at 32.4% of all.

Exhibit 6 Average Number of Verbal Interactions Reported by Operators by Language

Estimated Average Number of Verbal Interactions Reported by Operator with Rider(s)					
Language Spoken	per DAY	per WEEK	per MONTH	per YEAR	Percentages
TOTAL	43	213	854	10,243	100.00%
English	28	140	559	6,703	65.44%
Spanish	14	69	277	3,319	32.40%
"Asian" (unidentified)	0	1	6	68	0.66%
Chinese	0	1	4	45	0.44%
Vietnamese	0	0	1	16	0.16%
Korean	0	0	1	14	0.14%
Tagalog	0	0	1	14	0.14%
Cambodian	0	0	0	2	0.02%
Armenian	0	0	0	4	0.04%
Russian	0	0	1	10	0.10%
"Middle Eastern" (unidentified)	0	0	1	10	0.10%
Arabic	0	0	0	4	0.04%
"Indian" (Hindi, Urdu, etc)	0	0	1	8	0.08%
Pakistani	0	0	0	2	0.02%
Scandinavian (?)	0	0	0	2	0.02%
Unknown European	0	0	0	4	0.04%
Haitian	0	0	0	2	0.02%
Sign Language	0	0	0	2	0.02%
UNKNOWN	0	0	1	12	0.12%

Data obtained from 112 coach operators interviewed in both East and West Valley facilities during the week of September 23, 2013

The Factor 2 component of the analysis suggests that the probability of transit interaction in our service area with members of the public who do not speak either English or Spanish, and are considered LEP persons, is miniscule when compared to those who are Spanish-speaking LEP persons.

GIS MAPPING OF SPATIAL DISTRIBUTION OF LEP LANGUAGES

Maps were made using US Census data at the tract level of spatial distribution of each of the seven identified LEP languages within the county and Omnitrans' service area (Exhibits 6 through 12). The seven maps are included, following (in order, they are: Spanish, Chinese (Mandarin), Korean, Vietnamese, Tagalog, Arabic, and Cambodian (Khmer or Hmong)).

The purpose in mapping spatial distribution of the important concentrations of LEP membership is for the agency to more effectively direct appropriate language services to its ridership. If, for example, certain route modifications were to be proposed in a particular region of the service area alone, and this region corresponded to high densities of a particular language group LEP population, then this knowledge could

better inform efforts at public outreach and permit the agency to offer better services to that population.

By determining where concentrations of different language LEP populations are more likely to be found, then, specific language translation services can be better mobilized and directed regionally when and where particular transit outreach efforts may be made. Several trends in spatial distribution of LEP language groups are noteworthy.

Spanish LEP speakers appear to concentrate centrally within the service area, in the cities of Fontana, Rialto, and San Bernardino, and along a narrow strip associated with the Holt Boulevard corridor running through Ontario and Montclair (Exhibit 7). That said, though, Spanish LEP speakers are found throughout the service area, and in numbers which are ten times greater than that for any other LEP language.

Mandarin Chinese LEP speakers and Korean LEP speakers (Exhibit 8 and Exhibit 9) tend to cluster most heavily in three areas: in Loma Linda, in northern Fontana and Rancho Cucamonga, and in southern Chino and Chino Hills. To a large degree, the same can be said for the spatial distribution of Tagalog LEP speakers (Exhibit 11), but Vietnamese LEP speakers are much more diffuse in their spatial distribution (Exhibit 10), and concentrations are to be found throughout the service area. Likewise, Arabic LEP speakers (Exhibit 12) are to be found scattered throughout the service area, and Cambodian LEP speakers (Exhibit 13) tend to cluster more centrally in the cities of San Bernardino and northern Redlands.

Note once more that the Spanish Language Speakers map (Exhibit 7) indicates numbers of LEP persons which is *an order of magnitude greater (ten times greater)* than that for any of the other LEP language maps (Exhibits 8 through 13).

Exhibit 7 Distribution of LEP Spanish Speakers in Omnitrans' Service Area

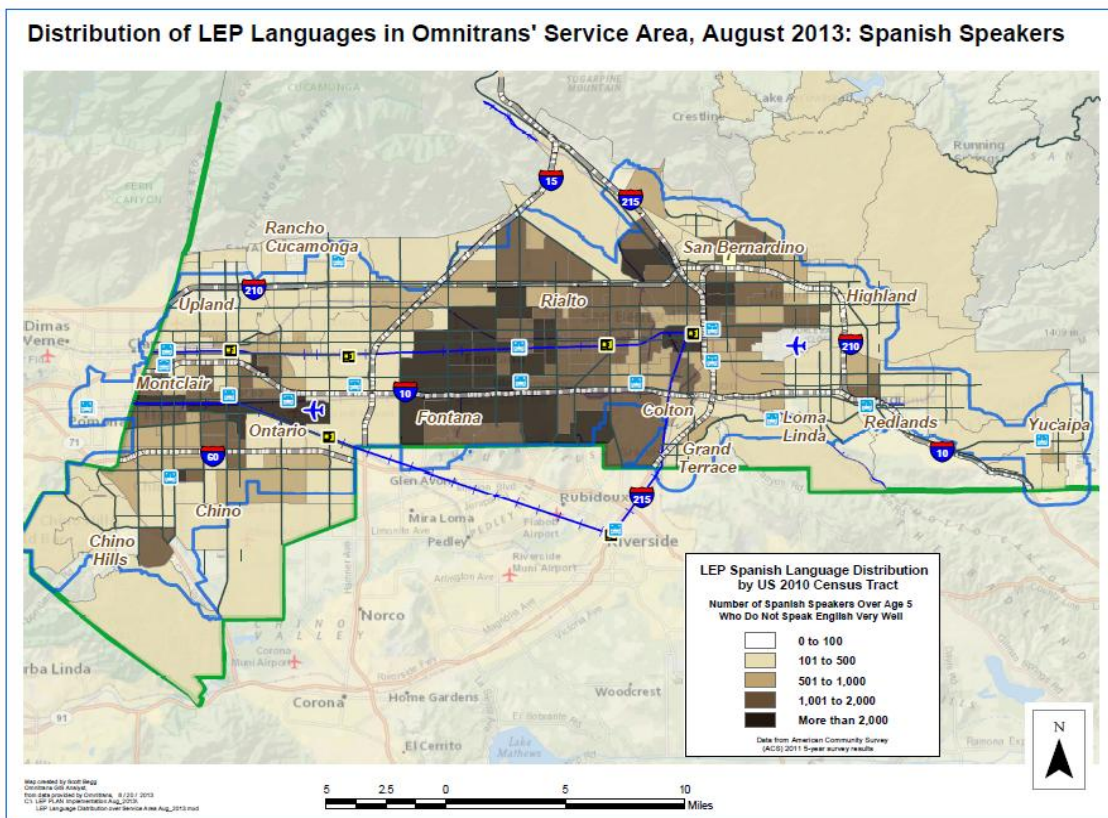


Exhibit 8 Distribution of LEP Mandarin Chinese Speakers in Omnitrans' Service Area

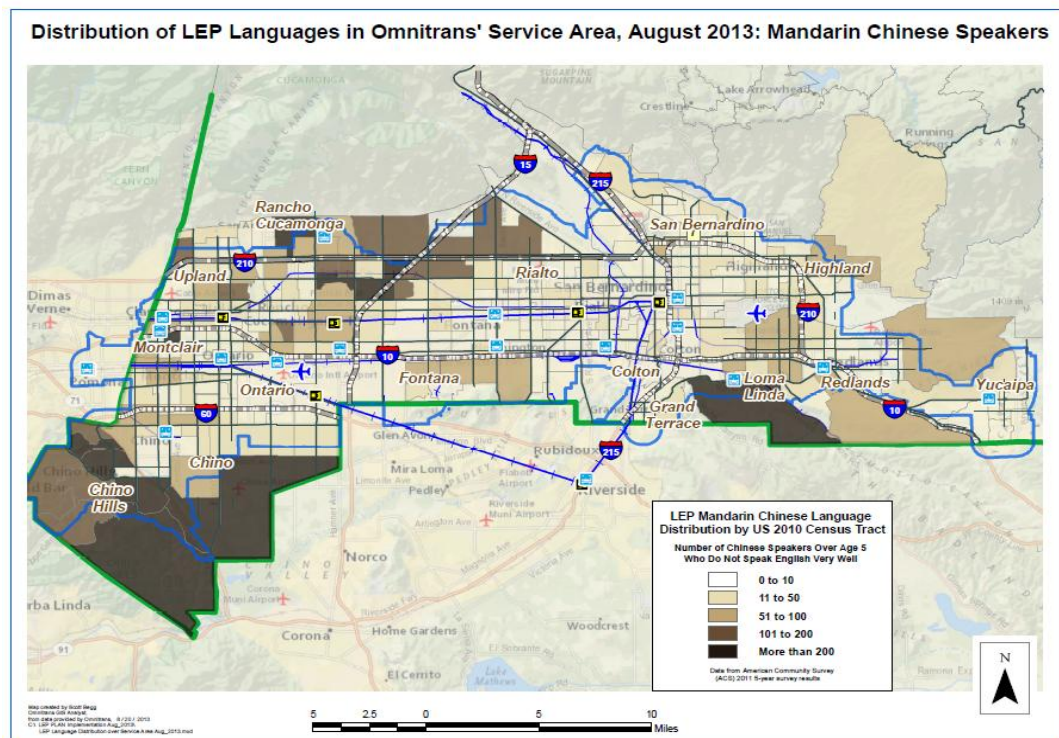


Exhibit 9 Distribution of LEP Korean Speakers in Omnitrans' Service Area

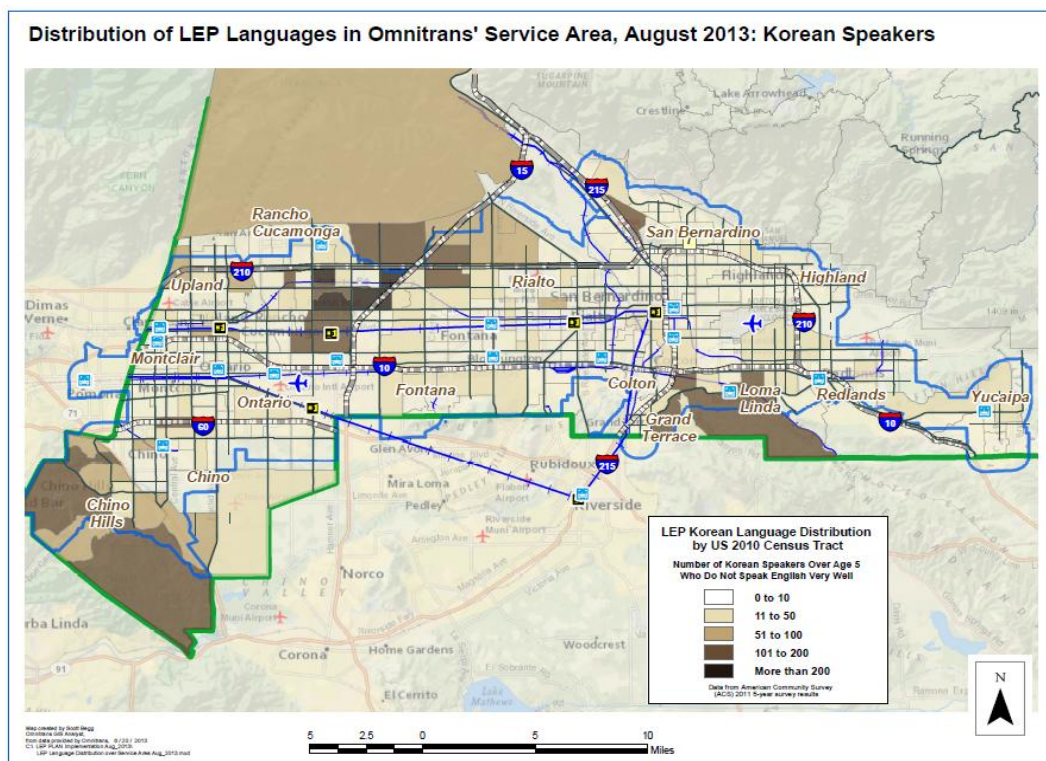


Exhibit 10 Distribution of LEP Vietnamese Speakers in Omnitrans' Service Area

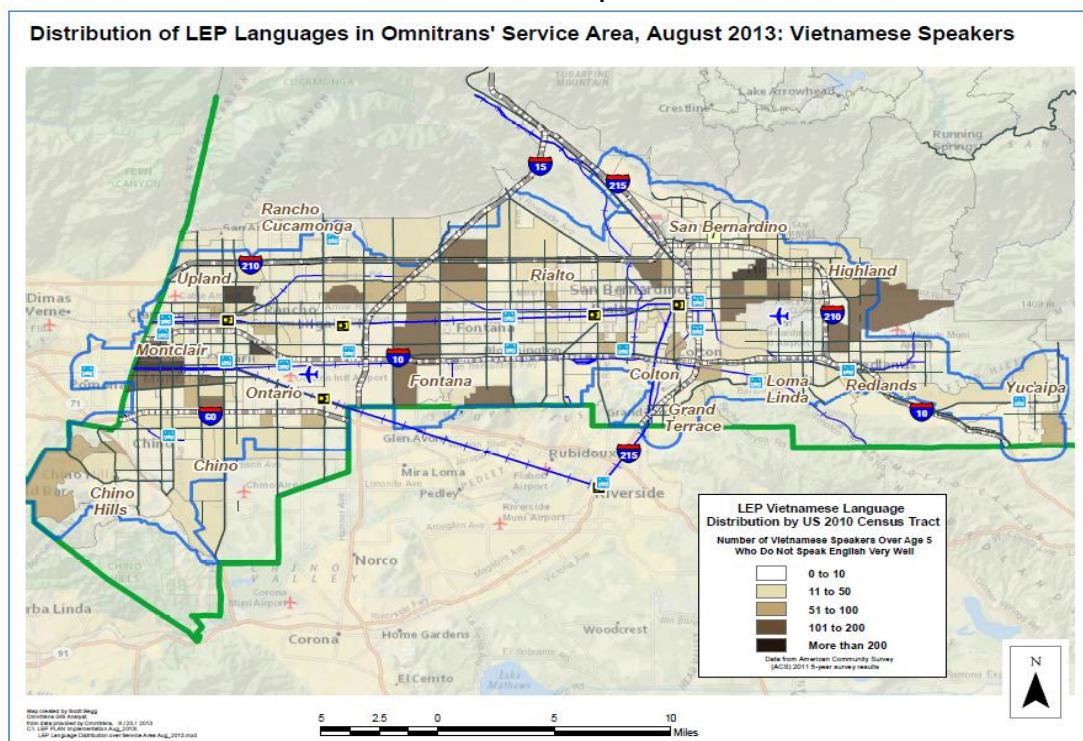


Exhibit 11 Distribution of LEP Tagalog Speakers in Omnitrans' Service Area

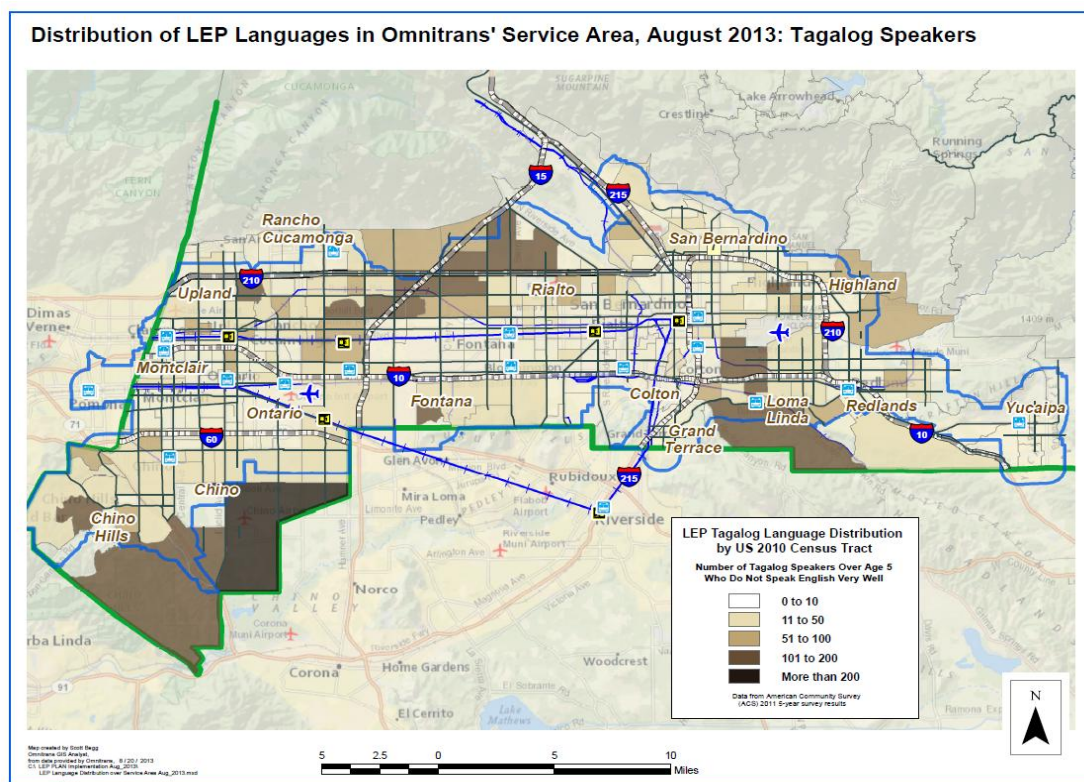


Exhibit 12 Distribution of LEP Arabic Speakers in Omnitrans' Service Area

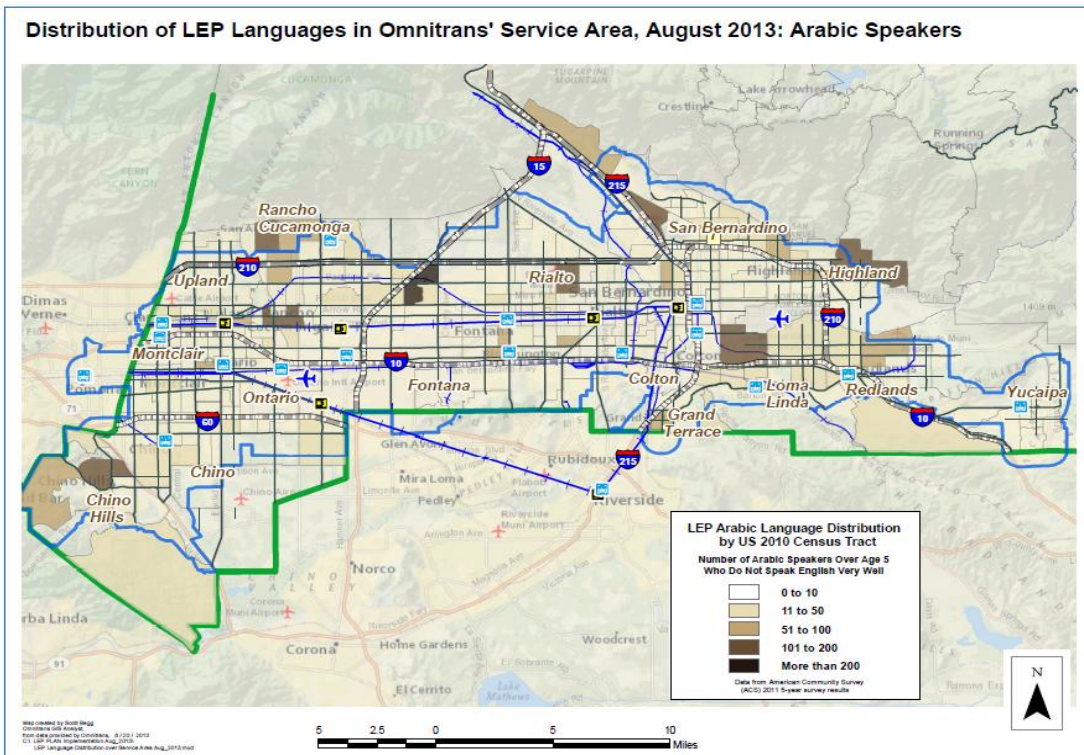
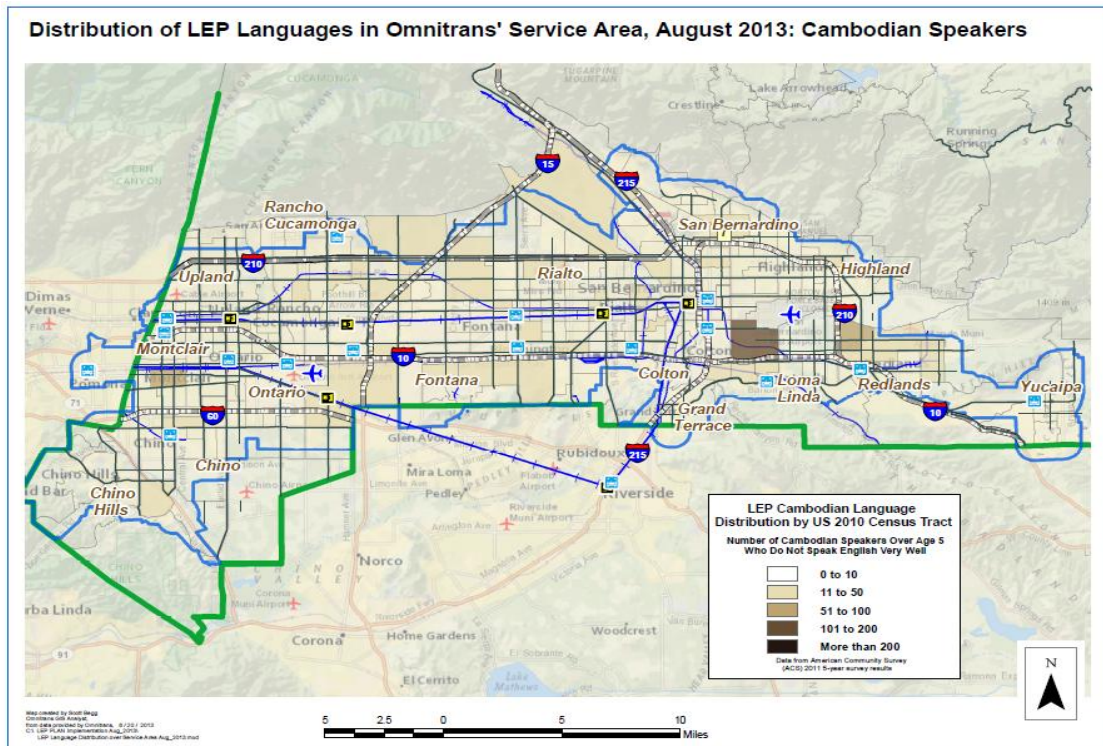


Exhibit 13 Distribution of LEP Cambodian Speakers in Omnitrans' Service Area



FACTOR 3

The Factor 3 component of the LEP Policy and demographic analysis is meant to demonstrate the important role of Omnitrans' services to the community as a public transit provider.

Many people who cannot or who choose not to use automobile transportation, for whatever reason, find that many of their most critical life activities are dependent upon public transit. Peoples' continued livelihoods in the guise of their transportation to work, their ability to shop and purchase food and other necessities, and even their critical social networks, are often absolutely dependent upon a good and efficient public transit system. As many in various LEP communities experience first-hand, they are often new to this country, and as such often occupy lower economic tiers as they start off; individuals in such situations often find they cannot afford an automobile of their own for some significant period of time, and this frequently translates to an increased need and dependency on their part for such services as transit.

Since March of 1976, Omnitrans has been empowered as a Joint Powers Authority (JPA) to be the primary provider of public transportation in the San Bernardino Valley. We provide fixed route service, local circulator service, and demand-response service, including ADA / Access service to riders who meet the criteria of the Americans with Disabilities Act of 1964. The agency serves an area of 456 square miles and a service area population of approximately 1.48 million people. In FY2013, Omnitrans served

nearly 16 million riders. As a transit provider, the service Omnitrans provides is considered to be of *high importance*, and as such, it is imperative that appropriate needs for LEP persons be met by the agency's decisions regarding translation of vital documents.

FACTOR 4

According to the respective probabilities of interaction determined by Factors 1 and 2 of the demographic analysis, Omnitrans will allocate resources commensurate to the task of meeting the needs of translation of vital documents for LEP populations. This includes the following:

1. **Continued use of In-House, ad-hoc language speakers** A number of employees already speak most of the seven identified LEP languages (exceptions: Cambodian and Arabic); these individuals have in the past been and will continue to serve as "In-House language speakers" who serve in the capacity of ad-hoc interpreters at specific workshops, events, and public hearings and outreaches.
2. **Training and Certification of In-House personnel** All of the information clerks who receive and process calls at the Information desk are bilingual (Spanish/English) and are skilled at explaining occasionally complex transit terminology into an easy to understand framework. For ad hoc speakers, Omnitrans will formally catalogue and ensure that these speakers are comfortable and capable of explaining transit terminology before be used in a formal or informal way.
3. **An Off-Site, out-sourced translation service.** As of May of 2014, Omnitrans has hired the services of an off-site, on-call telephone translation service. This is Avaza Language Services Corp. (5209 Linbar Drive, Suite 603, Nashville, TN 37211 615-534-3400 www.avaza.co), and their service will consist of being an on-call support service for our front office information clerks, and when necessary, having LEP-language calls directed to them, whereupon they will identify the LEP-language, and offer real-time translation service for the caller.

LEP Policy

As per Title VI of the Civil Rights Act of 1964, the U.S. Department of Transportation (DOT) implementing regulations, and Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency (65 FR 50121, Aug. 11, 2000)", Omnitrans is federally mandated to develop and implement both an LEP Plan and a Language Assistance Plan (LAP) by which Limited English Proficiency (LEP) persons can gain meaningful access to translations of written and oral information of Omnitrans' services.

Being a Federal Transit Administration (FTA) recipient receiving federal financial assistance, Omnitrans must take reasonable steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and

activities for LEP persons; failure to do so may constitute national origin discrimination according to LEP Executive Order 13166 (2000).

To reiterate, the Safe Harbor provision states, “if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations. Translation of non-vital documents, if needed, can be provided orally.”

Based on the Four Factor Analysis reported here, Omnitrans identified both the vital documents necessary for riders to access services, and the language needs and services required to provide meaningful access to information for the LEP residents of our service area. A list of identified agency vital documents includes:

1. Instructional / Informational rider material in the form of a “*How to Ride*” brochure
2. Title VI protection notifications and Notice of Title VI obligations.
3. All public hearing notices (Public Meeting Announcements posted on agency’s website).
4. General notices stating that language translation assistance is available for LEP languages.
5. Notice of availability of Telephone Interpretation Services.
6. Decal or Driver panel bus card giving same information (language translation assistance is available for LEP languages).

Less critical documents will be translated and made available in Spanish primarily (bilingual translation), owing to the much higher probability of interaction with the Spanish-speaking LEP population:

1. Temporary, High-Importance bus stop information/signs (for major, long-term detours and high-importance Rider Alerts).
2. All onboard and customer / rider surveys.
3. Bus book.

Although Spanish has been identified as the most common LEP language, translation assistance in all seven LEP languages will be made available so as to include LEP persons.

Exhibit 14 List of Vital and Important Documents for Translation Exhibit 14 is a table clarifying the list of all LEP Vital Documents and their Translation.

Exhibit 14 List of Vital and Important Documents for Translation

Suggested List of All L.E.P. Vital and Important Documents for Translation			
	TRANSLATED INTO ALL LEP LANGUAGES	TRANSLATED TO REGIONALLY-SPECIFIC LEP LANGUAGES, AS LOCALLY APPROPRIATE (Minimum: Bilingual)	TRANSLATED INTO ONLY ENGLISH AND SPANISH (ONLY Bilingual)
1	Basic Instructional / Informational "How to Ride" brochure.		
2		Major, long-term detours or route changes; Important Rider Alerts	Temporary bus stop information or signage for less major long-term detours or route changes
3	Title VI Protection Notifications; Notice of Title VI obligations and protections		
4	ALL Public Hearing Notices; Public Meeting Announcements posted on website		
5		Onboard surveys; All Customer Surveys (as issued by identified linguistic sub-regions of service area, and by request); All Rider Surveys.	
6	General notices stating that Language Translation Assistance is Available for LEP languages; Notice of Availability of Telephone Interpretation Services; Decal or Driver Panel Bus Card		
7			Bus Book
8	ADA / Access Application Forms (in .pdf form, printed by request only)		

Language Assistance Plan

Under the LEP Policy, the Language Assistance Plan describes the procedures necessary to implement policy by, first, identifying LEP persons in need of language assistance; second, listing measures to be taken to offer language assistance to LEP persons; third, giving methods for initiating appropriate outreach to the LEP community; and fourth, what staff training and methods of monitoring and updating the plan will be followed in order identify demographic change as it occurs so that policy and plan might grow and accommodate those changes better.

1. Identifying LEP Persons in Need of Language Assistance

Omnitrans will perform a language needs assessment to determine the LEP language demographics of its service area (The Four Factor Analysis). It will avail itself of a variety of survey tools, but the most important of these in its arsenal will be a reliance on data from the most thorough source over the area as a whole; namely, the most recent US Census data. As the data is updated over time (with American Community Survey updates every three- to five-years), assessments will continue and be updated as well.

The agency has already completed such a Four Factor Analysis. It will also examine ridership surveys, analyze records (Information clerk records, etc.) for language assistance requests, and survey front-line staff (clerks, receptionists, coach operators)

for the same. Omnitrans has done this, and will regularly update and review these data as well.

Omnitrans will incorporate these assessment results in future updating of the LEP Implementation Plan and LAP, and in future triennial Title VI reports. As well, Omnitrans will continue to update the number and type of LEP-languages which exist and need to be served within our service area. At minimum, every three years, Omnitrans will re-analyze LEP language status and determine anew the number, type, and spatial distribution of LEP languages in its service area, to coincide with its triennial Title VI analysis, update, and submission to FTA, and will do so by use of current US Census demographic data and GIS tools.

2. Language Assistance Measures

- a. Omnitrans' customer information center (including front desk receptionists and information clerk staff) shall continue to provide bilingual services (Spanish). It shall also avail itself of a real-time translation service to assist in translating other LEP customer languages upon request. This has been contracted to be Avaza Language Services Corp. (5209 Linbar Drive, Suite 603, Nashville, TN 37211 615-534-3400 www.avaza.co). Their assistance consists of being a support service for our front office information clerks, and when necessary, having LEP-language calls directed to them, whereupon they identify the LEP-language, and offer real-time translation service for the caller. Individuals interacting with LEP callers undergo an in-house certification in which understanding of and ability to translate transit-specific terminology (e.g., terms such as: bus, coach, bus book, route, fare, schedule, stop, etc) is required, so as to provide the most efficacious and accurate translation service to those who call in need.
- b. Omnitrans shall also have language identification flashcards and / or an LEP language placard available at the front reception area and at all public meetings where information is distributed.
- c. Omnitrans' will continue to utilize Google translate as a way for website visitors to translate its page into any one of more than fifty languages.
- d. Public meeting announcements posted on Omnitrans' website shall be available in English and in all LEP identified languages.

3. Public Outreach Methods

The following public outreach techniques shall be employed or shall continue to be employed by Omnitrans either throughout its service area, or to address LEP-identified languages within particular regions / census tracts once the proportion of LEP persons becomes significant.

- a. Omnitrans shall make available to all riders a *How to Ride* brochure which will be translated into the identified LEP languages.
- b. All public hearing notices will continue to be published in an English language newspaper and in the LEP-identified language newspaper(s), if available. This is

already done for Spanish newspapers: in the past, Omnitrans has published information in *La Prensa* for marketing / information campaigns. As well, public notices have appeared in the past in *La Prensa*, but now we have expanded public notification into social media technology, with most of the notices being placed now on the front page of Omnitrans' website, and on Omnitrans' blog, Facebook account, Twitter, and on Omnitrans' mobile app. Our use of such publications and social media technology will be broadened in the future to include other LEP-identified languages where appropriate, i.e., in those regions defined by census tracts in which the LEP language usage is deemed significantly concentrated.

- c. Omnitrans will continue to advertise commercials on Spanish-language radio stations, e.g., KXSB *Radio Lazer* (101.5; 105.7 FM) and *Que Buena* (96.1 FM), and Spanish-language television stations, e.g., *Galavision* and *Fox Deportes* for advertising the NexTrip marketing campaign. Omnitrans will expand this practice in an endeavor to reach other LEP-language communities as well.
- d. All public hearing notices shall contain the following (or very similar) wording in both English and the LEP-identified languages on its website:

OMNITRANS, the regional mass transportation carrier in San Bernardino County, will hold a public hearing to obtain comments from citizens regarding proposed service changes as listed below.

NOTICE IS HEREBY GIVEN that a public hearing will be conducted by the staff of Omnitrans on the following dates, times and locations:

{Insert date(s), time(s) and location(s).}

*At this meeting, all interested parties or agencies will be afforded the opportunity to be heard. The public is welcome at these meetings any time within the specified dates and times to discuss with Omnitrans staff the proposed changes. Any person or agency may mail comments until **{Insert day, date and time}**. to the Omnitrans main office located at 1700 West Fifth Street, San Bernardino, California 92411 to the attention of the Planning Department. Comments may also be received by telephone by calling (909) 379-7150 or via email at {email address here}.*

PROPOSED CHANGES: {Insert proposed changes}

ENVIRONMENT

No adverse environmental impact is anticipated as a result of the proposed changes.

IN THE ABSENCE OF ANY SUBSTANTIVE COMMENTS, THE PROPOSED SERVICE CHANGES WILL BE IMPLEMENTED ON -Insert date.

***-Insert Name of Director/Manager of department making changes
-Insert Title of person above***

- e. Signage at all bus stops and stations will continue to rely heavily on character- and pictograph-oriented communication, and will rely less on English-only communication.
- e. General notification stating that language translation assistance is available for LEP-identified languages shall be included in Omnitrans public meeting agendas and at public meeting places for all Public Hearings, and in its Board Agendas. This will be included as part of Omnitrans' Public Outreach policy.
- f. At all Public Hearings or Public outreach events where it is likely that significant numbers of LEP persons will attend, at least one bilingual staff person (fluent in Spanish) shall attend with regular staff, and, upon request, at least one person fluent in the locally- or regionally-specific LEP-identified languages shall be present as well. Management will meet with employees who have been designated as being potentially specific LEP-language fluent, and have them undergo advise and consent prior to such events.
- g. All customer surveys, all onboard surveys, and all rider surveys will be made available in bilingual (Spanish and English) forms, and in the locally- or regionally-specific LEP-identified language(s), upon request.
- h. Notification of availability of Telephone Interpretation Services will be made available in all LEP-identified languages.
- i. All Board of Directors (Board) agendas shall contain wording similar to in English and the LEP-identified languages:

The Board of Directors meeting facility is accessible to persons with disabilities. If assistive listening devices or other auxiliary aids or Limited English Proficiency services are needed in order to participate in the public meeting, requests should be made through the Board Secretary at least three (3) business days prior to the Board Meeting. The Board Secretary's telephone number is 909-379-7110 (voice) or 909-384-9351 (TTY). If you have comments about items on the agenda or other general concerns and are not able to attend the meeting, please mail them to Omnitrans at 1700 West Fifth Street, San Bernardino, California, Attention Board Secretary. Comments may also be submitted by email to BoardSecretary@omnitrans.org.

Similar language with hyperlinks to all seven LEP language translations will appear in the online version of the Board Agenda prior to the end of 2014.

- j. Notice of Title VI obligations and protections and all Title VI complaint forms shall be made available in English, Spanish, and in the LEP-identified languages. A document including Title VI protection and legal statement for the agency will also be affixed on the panel directly behind the coach operator on all Omnitrans fixed-route, OmniGo, and sbX vehicles. The language on this document will read as follows: *"In accordance with the Title VI Civil Rights Act of 1964, Omnitrans prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. To request information on procedures for filing a complaint or to notify Omnitrans of any perceived violation of the act, please contact Omnitrans Information at (800) 966-6428."* This statement will appear in English and the seven identified LEP

languages. Placard, decal, and flashcards shall give information in identified LEP languages for how a customer may go about availing himself / herself of LEP translation services. Placards or decals will be placed in all vehicles by September, 2014.

- k. ADA / Access Application Forms shall be translated upon request into all LEP-identified languages and retained in .pdf file format; English and Spanish translations will automatically be made available to all applicants, and printouts into the LEP-identified languages from .pdf original can be made available upon applicant request. This will be done by September of 2014.

4. Staff Training, and Monitoring / Updating of Policy and Plan

The following training shall be provided to members of Omnitrans' staff who are vital to the LEP Plan (namely, coach operators, customer service and information clerks and receptionists, executive director positions, and to those who are involved with public outreach):

- a. Information regarding Omnitrans' Title VI Policy and LEP responsibilities
- b. Information on Title VI complaint forms and procedures
- c. Description of language assistance services offered to the public
- d. Use of language identification flashcards and / or placards and / or coach decals
- e. Documentation of language assistance requests
- f. Use of interpretive services
- g. How to handle a potential Title VI / LEP complaint.

The LEP Policy and Language Assistance Plan are meant to be flexible, and are designed so as to be able to be upgraded as new census and survey data become available and indicate changes in demographic / linguistic composition of Omnitrans' ridership, and the need to increase or even decrease the number of LEP-identified languages. Annually, or as often as surveys are taken or that new ACS three- and five-year surveys become available, Omnitrans staff shall evaluate the LEP policy and Language Assistance Plan, and propose changes when and where new changes are identified. Regular revisions to the policy will incorporate the following source inputs:

- a. Surveys and studies
- b. New American Factfinder and / or new ACS (American Community Survey) and or new ten-year census data as it becomes available.
- c. Formal comments obtained from the public.
- d. Board member feedback, and feedback from customers, community members, and Omnitrans staff.
- e. Input and recommendations from other federal, state, and local or transit officials.
- f. Changes in regulations.

In addition, review of the following areas based on long-term monitoring might inform decisions regarding further updates to the plan:

- a. Assessments of the number of annual documented LEP person contacts
- b. Re-assessments of the number of LEP persons based on updated survey or census data
- c. How needs of LEP persons have been addressed, based on feedback, etc.
- d. Determination of whether or not the need for translation services has changed
- e. Determination of sufficiency of financial resources for funding further LEP language resources / efforts
- f. Determination of efficacy / sufficiency of current LEP efforts
- g. Determination of whether Omnitrans has fully complied with the goals of the LEP Policy and Language Assistance Plan

Omnitrans' Board of Directors will approve / has approved the current LEP Policy in August, 2014. All proposed revisions to the LEP Policy and Language Assistance Plan will be presented to the Board and the public for consideration and approval.

Conclusion

The LEP Policy and Language Assistance Plan are designed to be flexible and to be reviewed in an ongoing process. Continuous monitoring of demographic changes will help determine if new documents and/or services need to be made available to LEP persons. Updates to the LEP Policy and Language Assistance Plan will be made to reflect necessary changes.

This LEP Policy and the Language Assistance Plan will be made available on Omnitrans' website at www.Omnitrans.org. Alternately, any person may request a copy of the plan via telephone, fax, mail, email, or in person at the Omnitrans main office. LEP individuals may request translated copies of documents in an LEP-identified language.

Questions or comments regarding the LEP Policy and Language Assistance Plan may be submitted to Scott Begg, Planner, Omnitrans Planning Department, as follows:

Omnitrans
Scott Begg, Planner
1700 West Fifth Street,
San Bernardino, CA 92411
(909) 379-7275 (phone)
(909) 889-5779 (fax)
Email: scott.begg@omnitrans.org

APPENDIX-K OMNITRANS' SUB-RECIPIENT SELF CERTIFICATION FORM

Omnitrans' sub-recipient self-certification form begins on the following page.

OMNITRANS SUB-RECIPIENT
ANNUAL FTA COMPLIANCE SELF-CERTIFICATION
FY 2013

Sub-Recipient: _____

Grant No.(s): _____

Project Description: _____

The following declarations and information are hereby provided related to the above-referenced FTA-funded project during the past fiscal year:

I. GENERAL CERTIFICATIONS (to be completed by all sub-grantees)

A. Financial

1. Do you have the financial capacity to match FTA grant funds/FTA funded grant projects? Yes_____ No_____
2. Are your invoices being properly recorded and sent to Omnitrans by a supervising project manager with knowledge of FTA Compliance?
Yes_____ No_____
3. Are indirect costs being charged to grants? Yes_____ No_____
- If yes, do you have a cost allocation plan to support indirect administrative costs related to a grant program? Yes_____ No_____
4. Have annual single audits been conducted? Yes_____ No_____
- If Yes, please supply a copy to Omnitrans.**
5. Are there any unresolved compliance issues in the single audits conducted in the past three (3) years? Yes _____ No_____
6. Have any internal, state, or local government audit reports had findings relating to FTA program requirements? Yes_____ No_____
- If Yes, please supply a copy to Omnitrans**

B. Technical

1. How do you monitor contractors/lessees to ensure compliance with FTA requirements?

C. Satisfactory Continuing Control

1. Did you make incidental use of any FTA-funded real property? Yes_____ No_____
- If yes, was FTA approval obtained? Yes_____ No_____

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Do you maintain continuing control over the property? Yes___ No___

Is revenue generated used for transit purposes? Yes___ No___

D. Procurement

1. Do you have procurement policies and procedures that conform to applicable federal laws? Yes___ No___
2. Do any potential conflicts of interest exist between policy board members/employees and consultants /vendors/suppliers or between a management contractor and consultants/vendors/suppliers?
Yes___ No___
3. Do you allow for full and open competition for all transaction under the following methods of procurement?
 - a. Micro-Purchases (\$2,500 or less) Yes___ No___
 - b. Small Purchases (More than \$2,500, but not more than \$100,000)
Yes___ No___
 - c. Sealed Bids/Invitation for Bid (IFB) Yes___ No___
 - d. Competitive Proposals/Request for Proposals (RFP) Yes___ No___
 - e. Architectural and Engineering Services (A&E) Yes___ No___
 - f. Revenue Contracts Yes___ No___

E. Disadvantaged Business Enterprise (DBE)

1. Did you receive any complaints alleging that you did not comply with the DBE regulations in the past three (3) years? Yes___ No___
2. Did you award a contract to a firm that did not meet a specific DBE contract goals? Yes___ No___

If Yes, how was it determined if “good faith efforts” by the firm were sufficient?

F. Lobbying

1. Has the grantee included the lobbying clause in all agreements and procurement solicitations exceeding \$100,000? Yes___ No___
2. Has the grantee used non-federal funds for lobbying activities? Yes___ No___

If yes, have the proper disclosures been made and filed with FTA on standard form LLL? Yes___ No___

Have all disclosures been updated quarterly if needed and so reported?
Yes___ No___

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G. Title VI – Civil Rights Compliance

1. Does your agency/organization have a Title VI program or plan?
Yes_____ No_____
2. Has a copy of this Title VI program or plan been submitted to Omnitrans?
Yes_____ No_____
3. Have you received any Title VI complaints during the past year?
Yes_____ No_____

H. Public Comment Process for Fare and Service Changes

1. Do you have a locally developed process for soliciting and considering public comments prior to a fare increase or major service reduction?
Yes_____ No_____
 2. Have you raised a fare or carried out a major reduction in service in the past three (3) years? Yes_____ No_____
- If Yes, describe briefly:

I. Americans with Disabilities Act (ADA)

1. Have you received any ADA-related complaints during the past year?
Yes_____ No_____

J. Safety and Security

1. Do you have a written policy on safety signed by the General Manager or the Board of Directors Chairperson? Yes_____ No_____
2. Do you have a written system safety program plan (SSPP) for its transit services?
Yes_____ No_____

K. Drug-Free Workplace

1. Have you established a drug-free workplace according to state and federal requirements? Yes_____ No_____
 2. Has any employee reported to you a criminal conviction for a drug statute violation that occurred in the workplace? Yes_____ No_____
- If yes, was the FTA notified? Yes_____ No_____

L. Drug and Alcohol Program

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1. Do you and/or your contractors and subcontractors have a drug and alcohol testing program for safety sensitive employees as defined by FTA?
Yes_____ No_____
2. Do you and/or your contractors and subcontractors conduct the following drug and alcohol tests:
 - i. Pre-Employment (drugs only)? Yes_____ No_____
 - ii. Random? Yes_____ No_____
 - iii. Post-Accident? Yes_____ No_____
 - iv. Reasonable suspicion? Yes_____ No_____
 - v. Return to duty? Yes_____ No_____
 - vi. Follow-up? Yes_____ No_____
3. Do you and/or your contractors and subcontractors use drug testing laboratories certified by the U.S. Department of Health and Human Services (DHHS)?
Yes_____ No_____

M. Equal Employment Opportunity (EEO)

1. Who at your agency is responsible for ensuring that EEO obligations are fulfilled?
2. Have you received any EEO complaints during the past three (3) years?
Yes_____ No_____

II. FACILITY CERTIFICATIONS (to be completed only for facility projects, i.e. transit centers, bus shelters, etc.)

A. Satisfactory Continuing Control

1. Did you dispose of any FTA-funded real property or equipment?
Yes_____ No_____
- If yes, please attach a list of the property/equipment disposed of to this form.
2. Was any real property or equipment removed from public transit service before the end of its service life? Yes_____ No_____
- If yes, was FTA notified? Yes_____ No_____

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B. Maintenance

1. Do you have a current written maintenance plan for your federally funded facilities and equipment? Yes_____ No_____
2. Does the plan include a program of inspections and preventative maintenance activities to ensure that assets are protected from deterioration and reach their maximum useful life? Yes_____ No_____
3. Does the maintenance plan prescribe a record keeping system for permanently recording the maintenance history of the equipment/facility? Yes_____ No_____
4. Are your federally funded facilities/equipment being maintained on time and in accordance with your maintenance plan? Yes_____ No_____

C. Procurement

1. Have all construction contracts greater than \$2,000, incorporated the Davis-Bacon Act Requirements? Yes_____ No_____
2. Have you included a Buy America provision for all procurement of steel, iron and manufactured products, except products with a waiver or small purchases of \$100,000 or less? Yes_____ No_____
3. Have you obtained and retained Buy America certifications from successful vendors for purchases of more than \$100,000? Yes_____ No_____

III. VEHICLE CERTIFICATIONS (to be completed only for rolling stock procurements, i.e. paratransit vehicles, buses, support vehicles, etc.)

A. Satisfactory Continuing Control

1. Do you have equipment records that provide the following information:
 - i. Description? Yes_____ No_____
 - ii. I.D. Number? Yes_____ No_____
 - iii. Acquisition date? Yes_____ No_____
 - iv. Cost? Yes_____ No_____
 - v. Federal percentage? Yes_____ No_____

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- vi. Grant Number? Yes_____ No_____
- vii. Location? Yes_____ No_____
- viii. Use and condition? Yes_____ No_____
- ix. Disposition action? Yes_____ No_____
- x. Vested title? Yes_____ No_____

2. Did you dispose of any FTA-funded real property or equipment?
Yes_____ No_____

If yes, please attach a list of the property/equipment disposed of to this form.

3. Was any real property or equipment removed from public transit service before the end of its service life? Yes_____ No_____

If yes, was FTA notified? Yes_____ No_____

4. Do you have any federally funded equipment that is operated by contractors?
Yes_____ No_____

If yes, do you maintain control of the equipment? Yes_____ No_____

5. Please update the attached list of all FTA-funded equipment with the current odometer reading for each of your vehicles listed.

B. Maintenance

- 1. Do you or your contractor have a current written vehicle maintenance plan for your federally funded rolling stock? Yes_____ No_____
- 2. Is the written maintenance plan you use consistent with the manufacturer's minimum maintenance requirements for vehicles under warranty?
Yes_____ No_____
- 3. Are your vehicle preventative maintenance inspections completed on time and consistent with your established maintenance plan? Yes_____ No_____

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4. Are maintenance procedures for wheelchair lifts and other accessibility equipment included in your maintenance plan and preventative maintenance inspections?
Yes_____ No_____
5. Are lifts and accessibility features repaired promptly as required by the DOT ADA regulations? Yes_____ No_____

C. Procurement

1. Have you included a Buy America provision for all procurement of steel, iron and manufactured products, except products with a waiver or small purchases of \$100,000 or less? Yes_____ No_____
2. Have you obtained and retained Buy America certifications from successful vendors for purchases of more than \$100,000? Yes_____ No_____

D. Charter Service

1. Have you used any federally funded rolling stock for charter service?
Yes_____ No_____
- If yes, was all charter service incidental service? Yes_____ No_____
- If yes, were records kept to fully recover the life of the property (i.e. were charter use days/miles subtracted from vehicles total service days/miles)?
Yes_____ No_____
2. Have any complaints been filed alleging that you have conducted charter service in violation of FTA regulations? Yes_____ No_____

E. School Bus

1. Have you operated exclusive school bus service? Yes_____ No_____
2. Have you provided school "tripper service?" Yes_____ No_____

By signing below, I, on behalf of the aforementioned subgrantee, declare that the information provided within this certification is true and correct to the best of my knowledge and that I am authorized to make this declaration on behalf of my agency.

Signature

Date

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Print Name

Title

By signing below, I, as the aforementioned subgrantee's contractor, declare that the information provided as it pertains to my operations for said subgrantee is true and correct to the best of my knowledge and that I am authorized to make this declaration on behalf of my firm.

Signature

Date

Agency/Company Name

APPENDIX-L TITLE VI STATEMENT AND COMPLAINT PROCEDURE DECAL ON AN OMNITRANS' COACH

[illegible]