Omnitrans 2018 Title VI Triennial Update

September 2018

{This Page Was Intentionally Left Blank}

Table of Contents

Introduction **1**
Background 1
Omnitrans' Mission 4
Personnel Structure 4
Services Provided 5
Report Purpose 10

General Reporting Requirements **13**
Omnitrans' Service Area 13
Applications for Financial Assistance 19
Civil Rights Compliance Review 19
Title VI Lawsuits 20
Signed Assurances 20
Construction Projects 20

Program Specific Requirements **24**
Demographic & Service Profile 24
Service Standards and Policies 26
Vehicle Assignment 29
Vehicle Headways 30
Transit Amenities 30
Transit Accessibility 36

Other Areas of Consideration **38**
Changes in Service Features 38
History of Recent Fixed Route Changes 40
Overall Triennial Service Equity Analysis 42
Assessment of Environmental Justice 42
Results and Conclusions 45
Information Dissemination 46
Minorities on Decision-making Bodies 47
Survey Information of Customer Demographics 48
Multilingual Facilities 49
Recent Enhancements for Multilingual / LEP Community 51
Record of Title VI Complaint Procedure, and of Title VI Complaints 53
Sub-Recipient Monitoring of Title VI Compliance 56
Title VI Complaints Received and Actions Taken 59
Title VI Statement and Complaint Procedure 60
Ongoing Training of Agency Personnel in Title VI Protocols 60
Documentation of Board Approval of Omnitrans' Title VI Program 60

Appendix-A: FTA Civil Rights Assurance **61**

Appendix-B: DOT Title Vi Assurance **62**

Appendix-C: FTA Title VI Discrimination Complaint Procedures 64

Appendix-D: Title VI Complaint Form 67

Appendix-E: Title VI Statement of Rights in Seven Languages (and Shown on Omnitrans Coach) 71

Appendix-F: Board Minutes Documenting Approval of Triennial Title VI Program 72

Appendix Volume II (Compilation of Additional Appendices)

Table of Contents AV-3

Appendix G: LIM Populations Served by Fixed Routes and by Bus Stops AV-4

Appendix H: Minority or Hispanic, Latino Population by Census Block Group AV-6

Appendix I: Low Income (White) Population by Census Tract AV-20

Appendix-J: Compilation of Service and Fare Equity Analyses AV-25

Appendix-K: Excerpts of Omnitrans Board Agenda Minutes Approving Equity Analyses AV-49

Appendix-L: History of Service Changes, 2015 to 2018 ..... AV-54

Appendix-M: Record of Complaints Received in Trapeze COM, 2015 to 2018 ..... AV-60

Appendix-N: Omnitrans' LEP Policy and LAP Plan AV-75

Appendix-O: Omnitrans' Sub-Recipient Self Certification Form AV-96

Appendix-P: Omnitrans' Sub-Recipient Monitoring Records AV-102

Appendix-Q: How to Ride Guide in All Seven Safe Harbor Languages and AVAZA Translation Service AV-1115

Appendix-R: Omnitrans' Public Outreach Policy AV-133

Appendix-S: Title VI Training AV-178

Table of Exhibits

Introduction 1
Exhibit 1: Major Service Changes at Omnitrans over the Last Three Years 1
Exhibit 2: Omnitrans' Service Area by ADA / Access Boundaries and by Municipal Boundaries 3
Exhibit 3: Span of Fixed Route Service 5
Exhibit 4: Omnitrans Family of Services 6
Exhibit 5: Omnitrans Fixed Route Network, as of May 2018 7
Exhibit 6: Omnitrans' Fixed Route Network by Frequency of Service, FY2018 8
Exhibit 7: Omnitrans' Fixed Route Network and Connectivity to Neighboring Transit Agencies 9
Exhibit 8: Omnitrans Access Service Area Based on ¾-mile Buffer around Fixed Route Network 11
Exhibit 9: Omnitrans' Access Service Area by Fare Zones 12

General Reporting Requirements 13
Exhibit 10: Total Minority Population by Census Block Group (Data from 2014 ACS 5-Year Estimate) 14
Exhibit 11: Percentage Minority Population by Census Block Group (Data from 2014 ACS 5-Year Estimate) 15
Exhibit 12: Percentage of Population Below Poverty by Census Block Group (Data from 2014 ACS 5-Year Estimate) 16
Exhibit 13: Percentage of LIM (Low Income White / Minority) by Census Tract and Block Group (Data from 2014 ACS 5-Year Estimate) 17
Exhibit 14: Percentage of Population Living Below the Poverty Line 18
Exhibit 15: Driver's Licenses Status for Riders and County Overall, 2017 18
Exhibit 16: Household Vehicle Availability, 2011 vs. 2017, Riders vs. Service Area Residents Overall 18

Program Specific Requirements 24
Exhibit 17: Percent Minority Population within a ½-Mile Walking Buffer of All Omnitrans Services 25
Exhibit 18: Vehicle Load Standards 26
Exhibit 19: Maximum Occupancy by Bus Type and Number of Wheelchairs 26
Exhibit 20: Fixed Route Vehicle Summary 26
Exhibit 21: Average Peak Loads by Time Period (Calendar Year 2017) 27
Exhibit 22: On Time Performance of Fixed Routes, FY2017 28
Exhibit 23: Fixed Route Vehicle Series Type Assignments by Division 29
Exhibit 24: Contract Services Vehicle Series Type Assignments by Division 29
Exhibit 25: LIM & Non-LIM Populations Served by Omnitrans Bus Stops, 2018 31
Exhibit 26: Fixed Route Bus Stops and Percent Minority Population within Omnitrans Service Area 32
Exhibit 27: Fixed Route Bus Stops with ½-mile Pedestrian Buffer of Omnitrans Routes and Percent Minority Population 33

Exhibit 28: Fixed Route Bus Stops with Benches and Percent Minority Population within Omnitrans Service Area 34
Exhibit 29: Fixed Route Bus Stops with Shelters and Percent Minority Population within Omnitrans Service Area 35
Exhibit 30: Bus Stops and Bus Stop Amenities by City, 2018..... 36

Other Areas of Consideration 38
Exhibit 31: Omnitrans Fixed Route Headways by Route as of May 2018..... 38
Exhibit 32: Omnitrans Fixed Route Service Span by Route (Revenue Times), May 2018..... 39
Exhibit 33: Major Changes from September 2015 to September 2018 and January 2019..... 40
Exhibit 34: Low-Income / Minority Determination by Route Buffering Method 43
Exhibit 35: Low-Income / Minority Determination by Buffering of Route Stops Method 44
Exhibit 36: Low-Income / Minority Demographic Profile by Fixed Route 45
Exhibit 37: Comparison of Ethnicity of Omnitrans Riders in 2017 vs 2011, and vs Profile of County Ethnic Makeup Overall, 2017..... 48
Exhibit 38: Comparison of Annual Incomes for Omnitrans Riders vs San Bernardino County Residents..... 49
Exhibit 39: Sub-Recipient Title VI Program Compliance..... 58

Appendix-A: FTA Civil Rights Assurance 61

Appendix-B: DOT Title Vi Assurance 62

Appendix-C: FTA Title VI Discrimination Complaint Procedures 64

Appendix-D: Title VI Complaint Form..... 67

Appendix-E: Title VI Statement of Rights in Seven Languages (and Shown on Omnitrans Coach) 71

Appendix-F: Board Minutes Documenting Approval of Triennial Title VI Program 72

INTRODUCTION

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 2015 Title VI Triennial report, Omnitrans' services have undergone a series of changes. 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	IMPLEMENTED DATE	Equity Analysis Completed
1. Route 290 begins service; SBTC opens (some East Valley Routes change their EOL to move to new SBTC).	September 7, 2015	Yes
2. West Valley Service Changes: elimination of some routes (63, 65, 68); introduction of new routes (84, 85, 86); interlining of some routes (67, 80, 81, 83, 84, 85); and alignment changes or adjustments in others.	September 7, 2015	Yes
3. Realignment of Route 215 to coincide with RTA closing of its Transit Center in Downtown Riverside. New alignment serves same area & Metrolink Station.	January 2, 2017	Yes
4. Introduction of new Route 208, a peak-hour freeway express service from Yucaipa to SBTC.	May 1, 2017	Yes
5. PROPOSED: September 2018 and January 2019; Alignment changes to Routes 14, 83, 86 (NOTE: Not a Major Service Change)	September, 2018	Yes
6. PROPOSED: Adding of sbX Saturday service, and reduction in frequency of Route 2 weekend service.	January, 2019	Yes

Omnitrans' service area is approximately 456 square miles based on the ¾-mileAmericans with Disabilities Act (ADA) service area requirement around fixed routes as shown in Exhibit 2. According to the US Census' American Community Survey 2015 1-year and 3-year average estimates, Omnitrans' ADA Access service area is 1.38 million people, while the service Area by municipal boundaries contains 1.49 million people. The population of the entire county is 2.13

million. 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 2020 should be more than 1.54 million, and in 2040 is projected to be 1.78 million people.

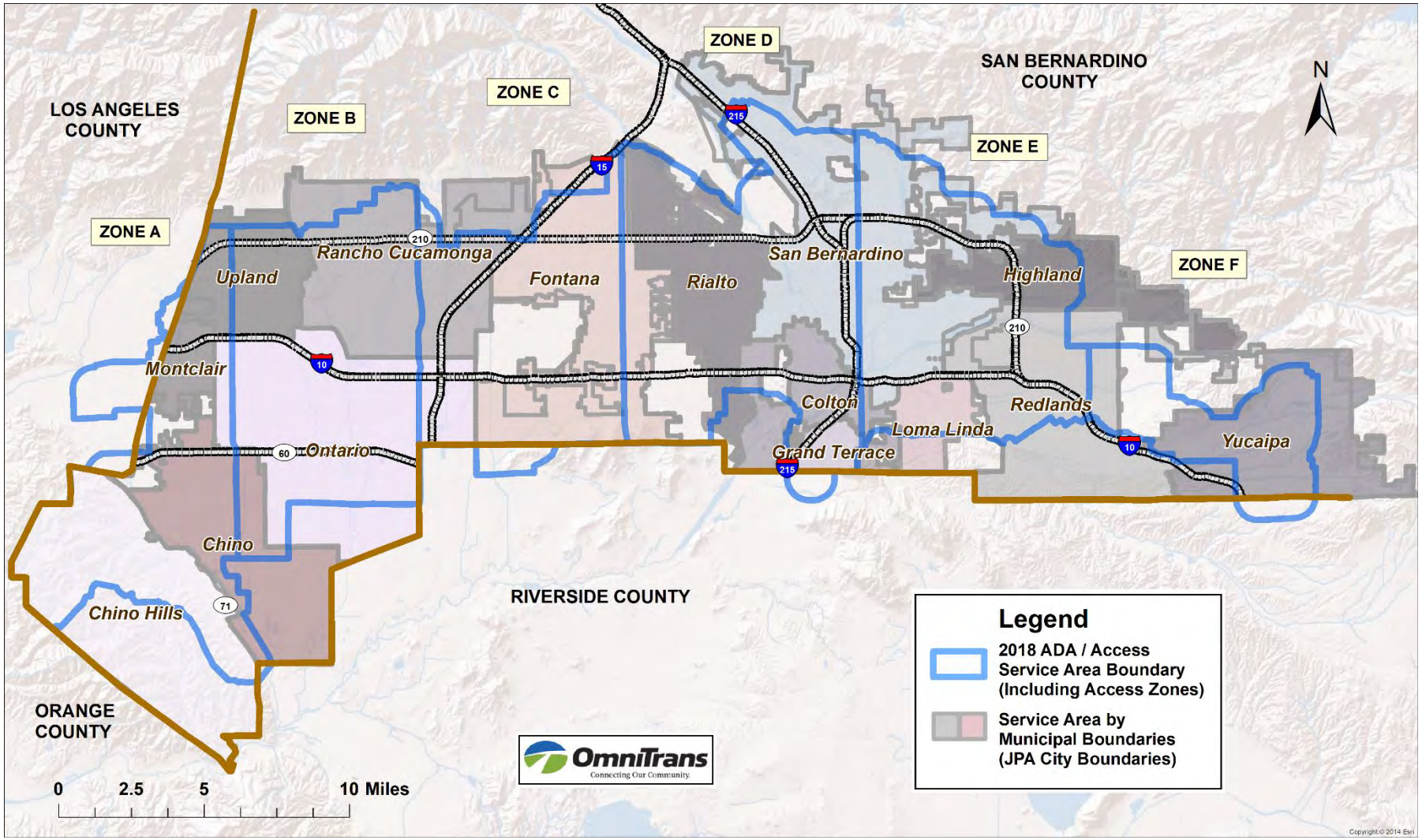
As of May 2018, Omnitrans operates a peak fixed route fleet of 148 coaches (96 assigned to East Valley and 52 assigned to West Valley) plus six more contracted fixed route vehicles which server OmniGo circulator routes in Chino Hills, Grand Terrace, and Yucaipa. Omnitrans' demand response fleet consists of 100 contracted service vehicles.

Since the submission of Omnitrans' 2015 Triennial Title VI report, Omnitrans' system wide ridership has declined from 13.9 million riders in FY2015 million to 11.4 million riders in FY2018. Omnitrans was certainly not the only transit agency to experience this in Southern California, and a UCLA Institution of Transportation Studies paper (*Falling Transit Ridership: California and Southern California*, prepared for SCAG, January, 2018) suggested a number of causes, including peaking gasoline prices, neighborhood demographic change and migration, and Assembly Bill AB-60 which might have significantly increased the number of undocumented alien transit riders to move from transit dependency to obtaining licenses and driving their own vehicles.

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 ADA / Access Boundaries and by Municipal Boundaries



Omnitrans' Mission

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:

> "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 (SRTP):

- 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 Omnitrans to focus on five Strategic Initiatives outlined in the Management Plan for Fiscal Year 2019:

- Financial Sustainability & Operational Cost Efficiencies
- Service Expansion & Funding Growth
- Technology
- Safety & Security
- Workforce Stability

Personnel Structure

As of February of 2018, Omnitrans has a budgeted staff of 691 employees to provide its services, but at present employs 686. 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. Executive Office / Internal Audit Services
2. Human Resources & Safety Regulatory Compliance
3. Special Transportation Services
4. Rail
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). The Rail Department is new since the last Title VI updated. Currently, Omnitrans does not operate rail service, but it has been designated by the San Bernardino County Transportation Authority (SBCTA) as the operator of Redlands Rail, now known as Arrow, which is expected to enter revenue service in 2021.

Services Provided

Omnitrans currently operates a family of services, illustrated in Exhibit 4.

Fixed Route Services: As of May of 2018, Omnitrans operates 35 fixed bus routes consisting of 23 East Valley Routes (east of I-15); and 12 routes in the West Valley (west of I-15). Of these 35 routes, 30 are directly operated and five are contracted out and called OmniGo Community Circulators. The directly operated routes primarily utilize 40-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 6, and Exhibit 7 on the following pages illustrate Omnitrans' Fixed Route Network, demonstrate the tiers of service offered, and show Omnitrans' connectivity to neighboring transit agencies, respectively.

During the course of a typical weekday, Omnitrans operates approximately 20:18 clock hours of service; 18:04 clock hours on Saturdays; and, 15:32 clock hours on Sundays. The span of fixed route service for weekdays, Saturdays, and Sundays is given below in Exhibit 3:

Exhibit 3: Span of Fixed Route Service

	Weekdays	Saturdays	Sundays
Time Service Begins:	3:23 AM	4:50 AM	5:05 AM
Time Service Ends:	11:41 PM	10:54 PM	8:37 PM
Clock Hours:	20:18 hours	18:04 hours	15:32 hours

Exhibit 4: Omnitrans Family of Services

Service	Type	Brand	Image	Description
Fixed Route	Bus Rapid Transit (BRT)	sbX		BRT service mirrors light-rail service with dedicated amenities, stations and vehicles. sbX utilizes stations with level boarding, ticket vending machines, security cameras, emergency phones and enhance lighting. The route uses dedicated lanes and mixed flow, signal prioritization, all-door boarding and limited stop spacing to achieve faster service.
	Local	Omnitrans		Traditional large bus service operating on a set route with a set schedule at defined frequencies. Routes travel in mixed flow traffic with stops placed approximately every 0.2 miles.
	Express	Omnitrans		Freeway bus service using a traditional large bus on a set route with a set schedule and frequency that is designed to connect two or more areas of highly concentrated activity. Routes typically travel mostly by freeway and stops are placed several miles apart.
	Community Circulator	OmniGo		Smaller bus service designed to offer lifeline mobility for areas with relatively low population and employment density. OmniGo provides service to key locations within Grand Terrace, Chino Hills and Yucaipa. The service operates in mixed flow traffic with frequent stop placement.
Demand Response	ADA Paratransit	Access		Curb-to-curb service provided to comply with the Americans with Disabilities Act (ADA) that is complementary to fixed-route service, and is provided within ¾-mile of a fixed route. Beyond-the-boundary Access service extends Access past the ¾-mile fixed route boundary to the edge of each JPA member city, for a nominal fee.
Special Transit Services				Omnitrans Special Transit Services offers a variety of mobility services including Travel Training, Volunteer Driver programs, a Lyft & Taxi program, and many community based partnerships.

Exhibit 5: Omnitrans Fixed Route Network, as of May 2018

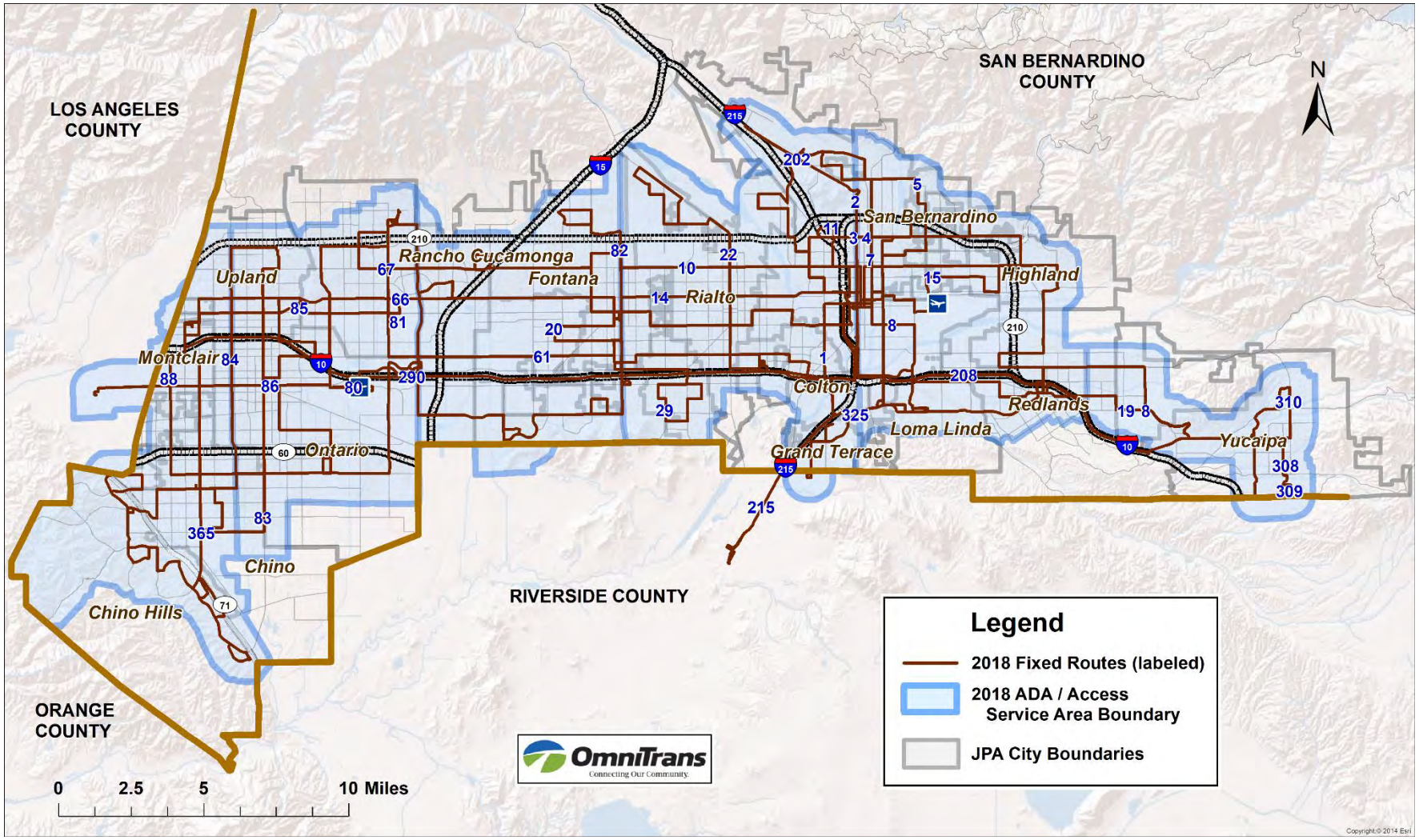


Exhibit 6: Omnitrans' Fixed Route Network by Frequency of Service, FY2018

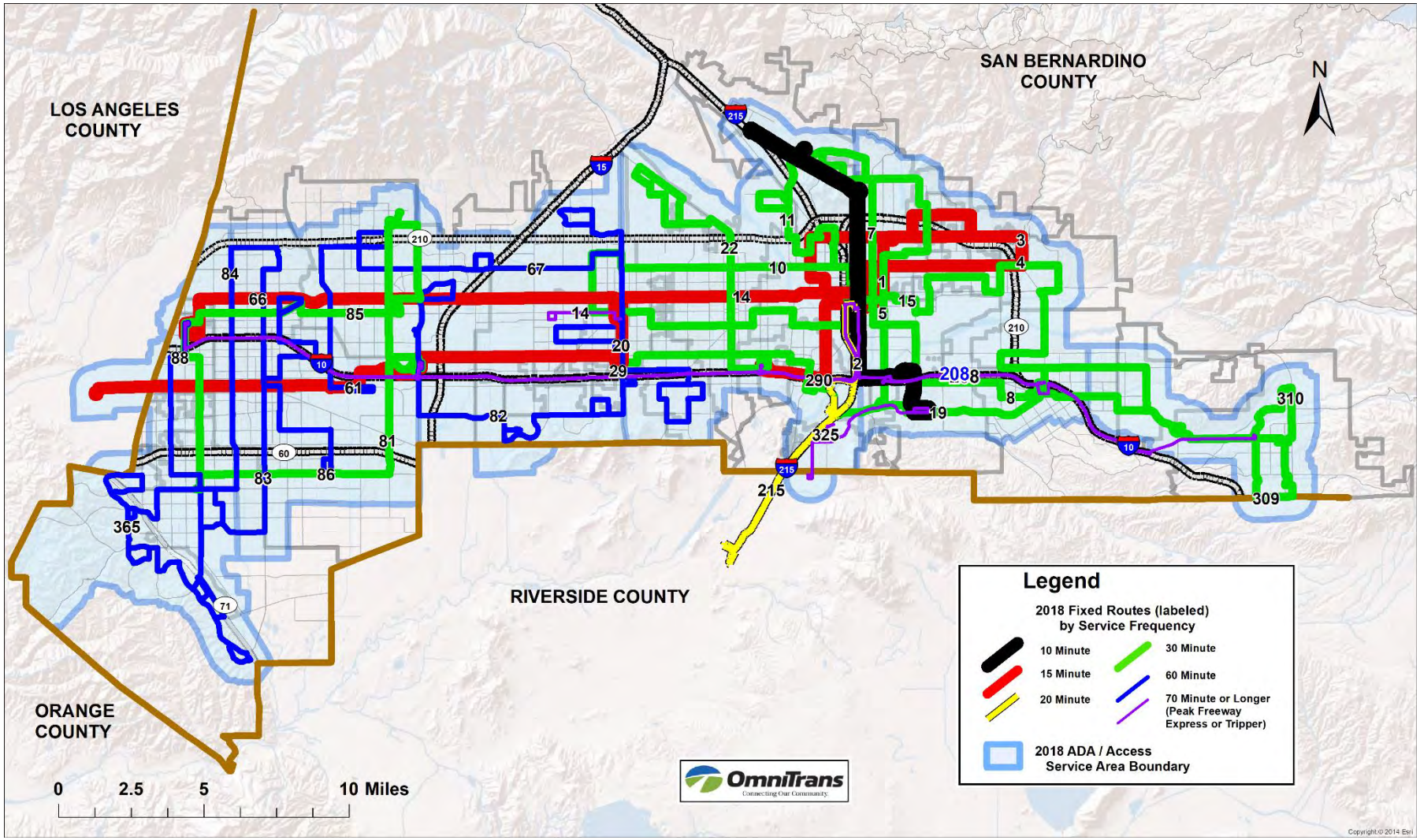
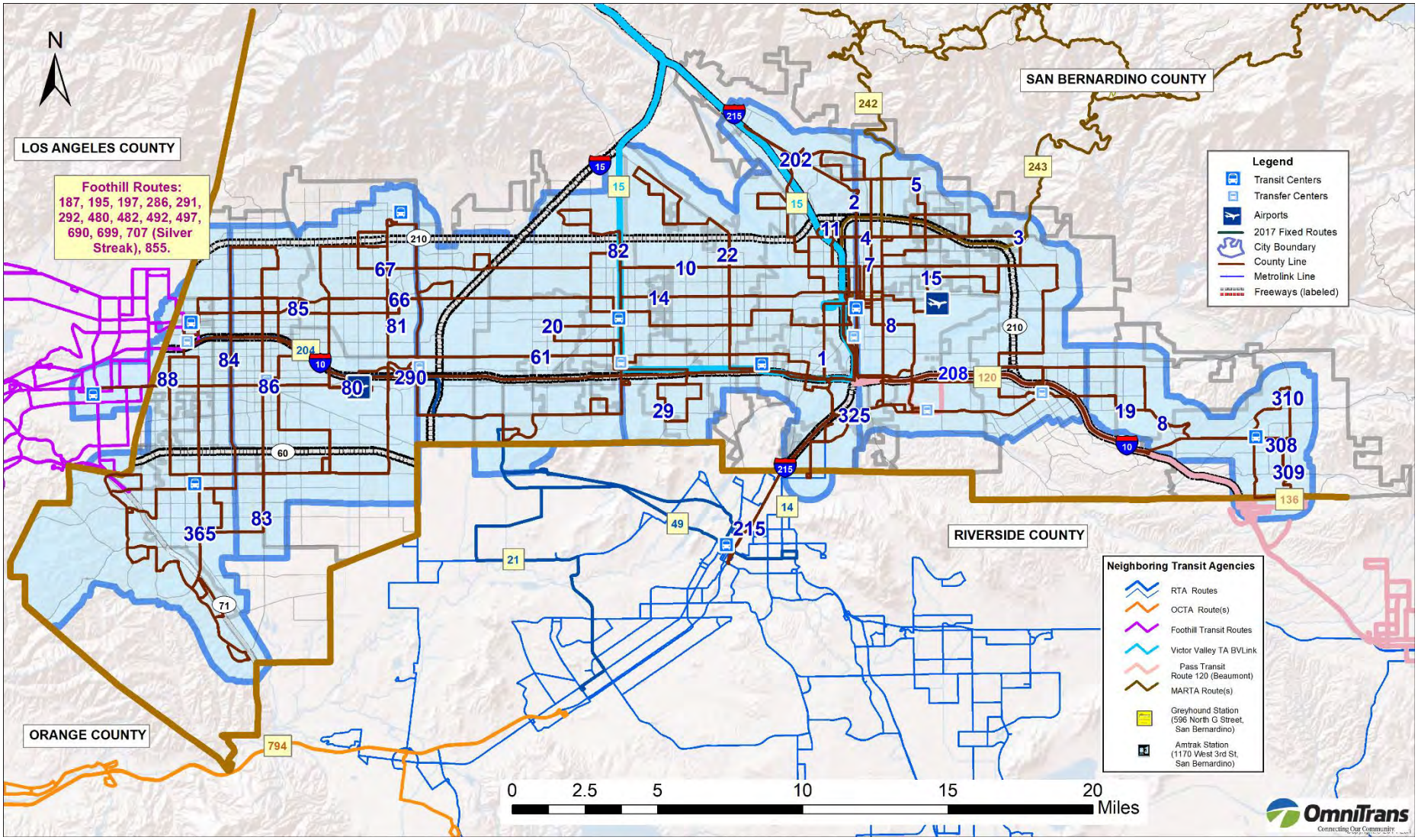


Exhibit 7: Omnitrans' Fixed Route Network and Connectivity to Neighboring Transit Agencies



Access Service: Access provides public transportation services for individuals who, due to disability, are prevented from using regular bus service (ADA certified). Access operates origin-to-destination 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.

Further 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. It may be demonstrated that no group or groups are being denied service based on discriminatory planning.

Exhibit 8: Omnitrans Access Service Area Based on ¾-mile Buffer around Fixed Route Network

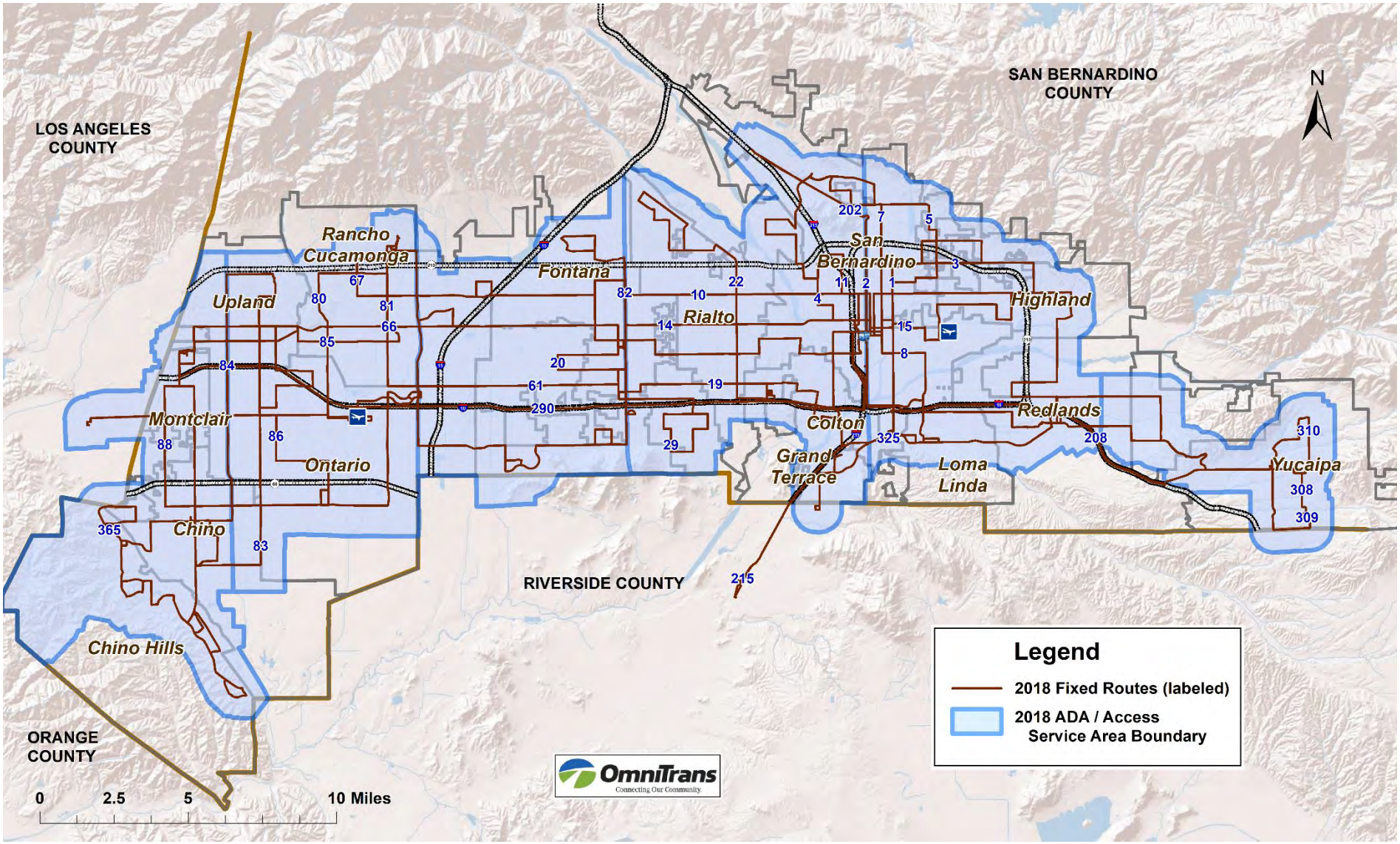
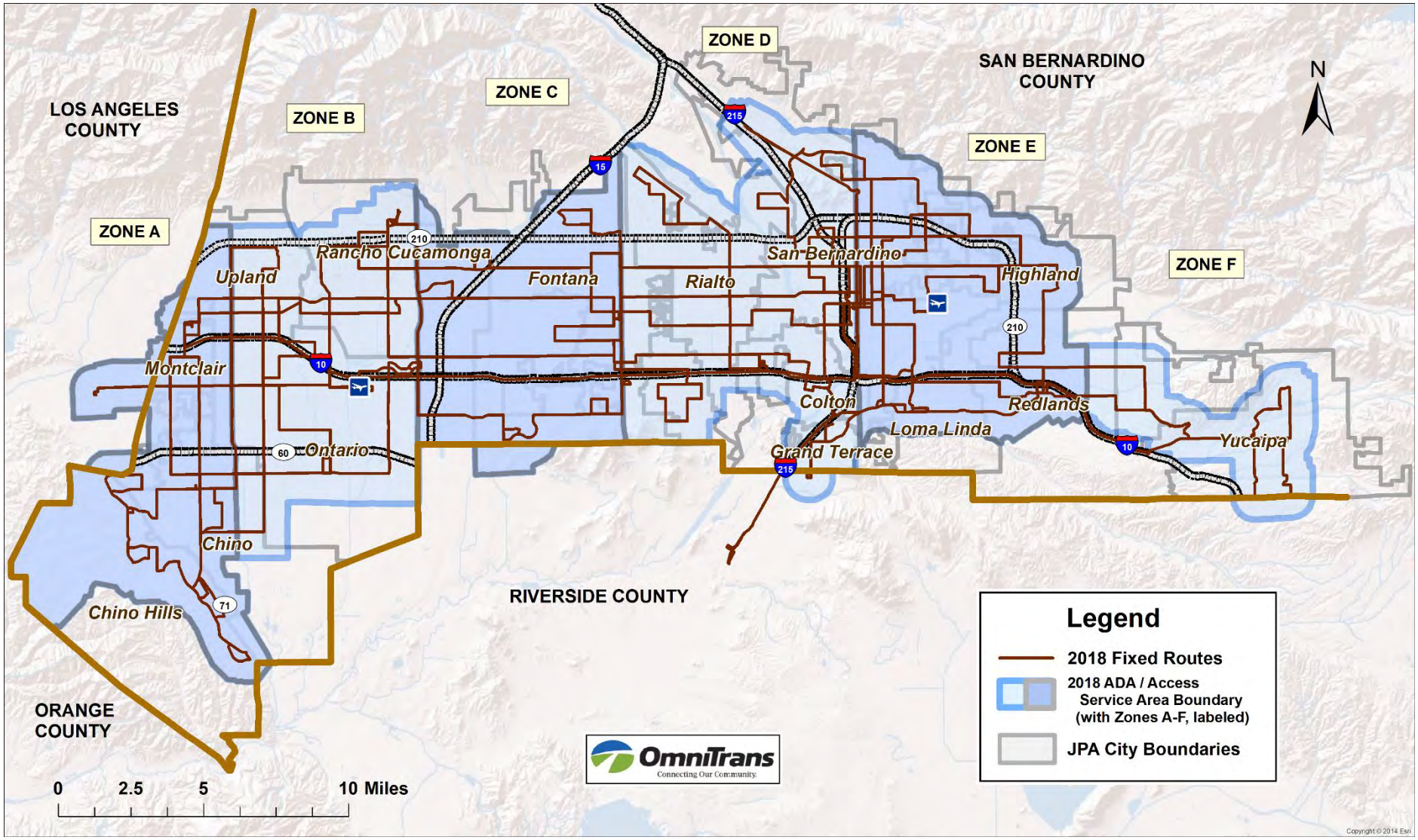


Exhibit 9: Omnitrans' Access Service Area by Fare Zones



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 1.49 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.

Based on Omnitrans' 2017 Onboard Rider Intercept Survey completed by Redhill Group, the typical Omnitrans rider is male (53% male to 47% female), most likely to be between the ages of 19 and 39 (48% of respondents), and more likely to self-identify as Hispanic/Latino (46%) than African American (25%) or Caucasian/White (17%). The majority of Omnitrans' surveyed riders reports an annual income of less than $35,000 (80%), and 57% report an annual income of less than $20,000. As such, poverty has a significant presence within Omnitrans' service area, and a substantial proportion of our riders would be described as Low Income or Minority (LIM).

Based on the US Census American Community Survey (ACS) 3-Year estimates, more than 79% of the population in Omnitrans' service area is LIM. The maps provided in Exhibits 9 through 12 illustrate the distribution of minority and low-income populations throughout Omnitrans' service area.

Exhibit 10: Total Minority Population by Census Block Group (Data from 2014 ACS 5-Year Estimate)

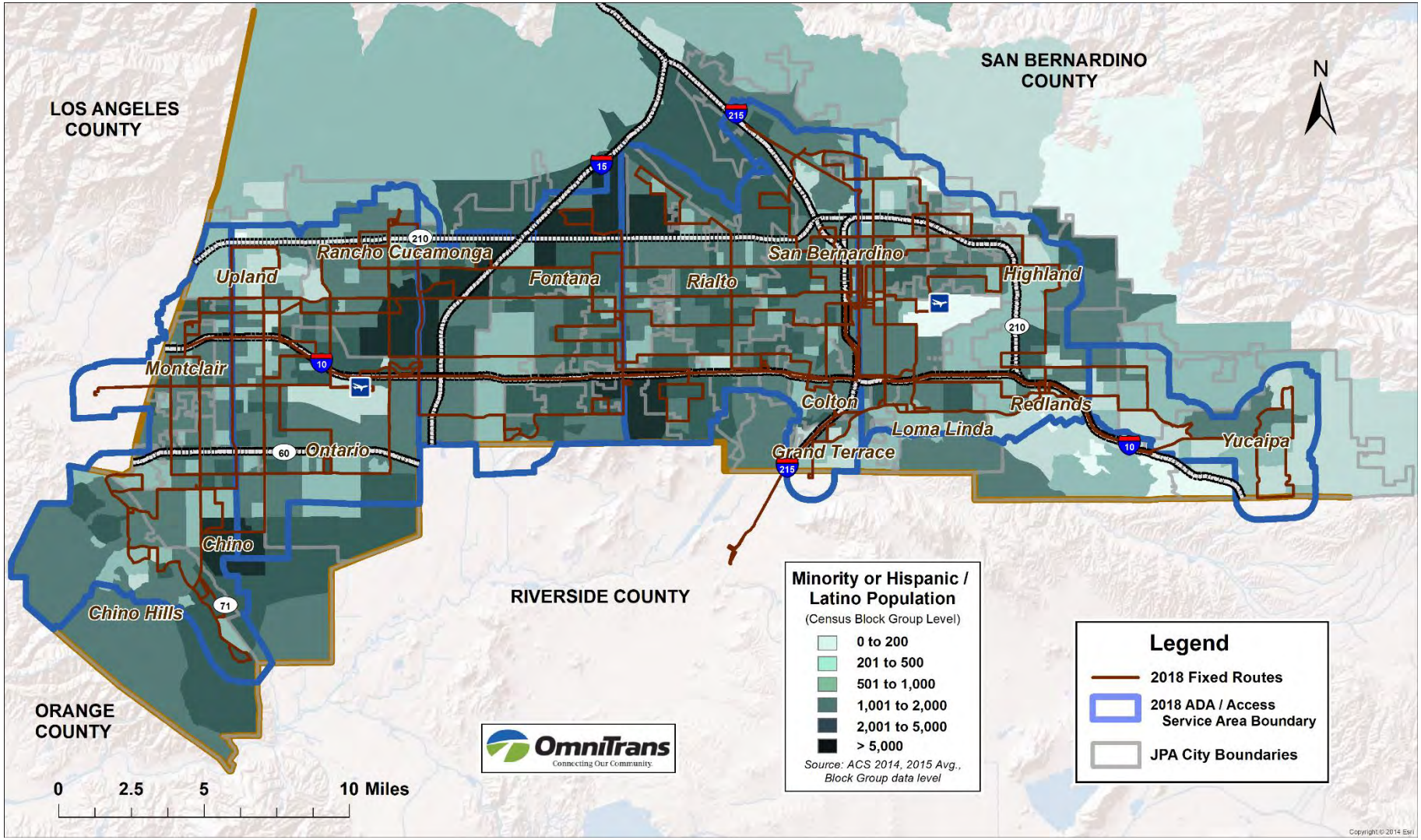


Exhibit 11: Percentage Minority Population by Census Block Group (Data from 2014 ACS 5-Year Estimate)

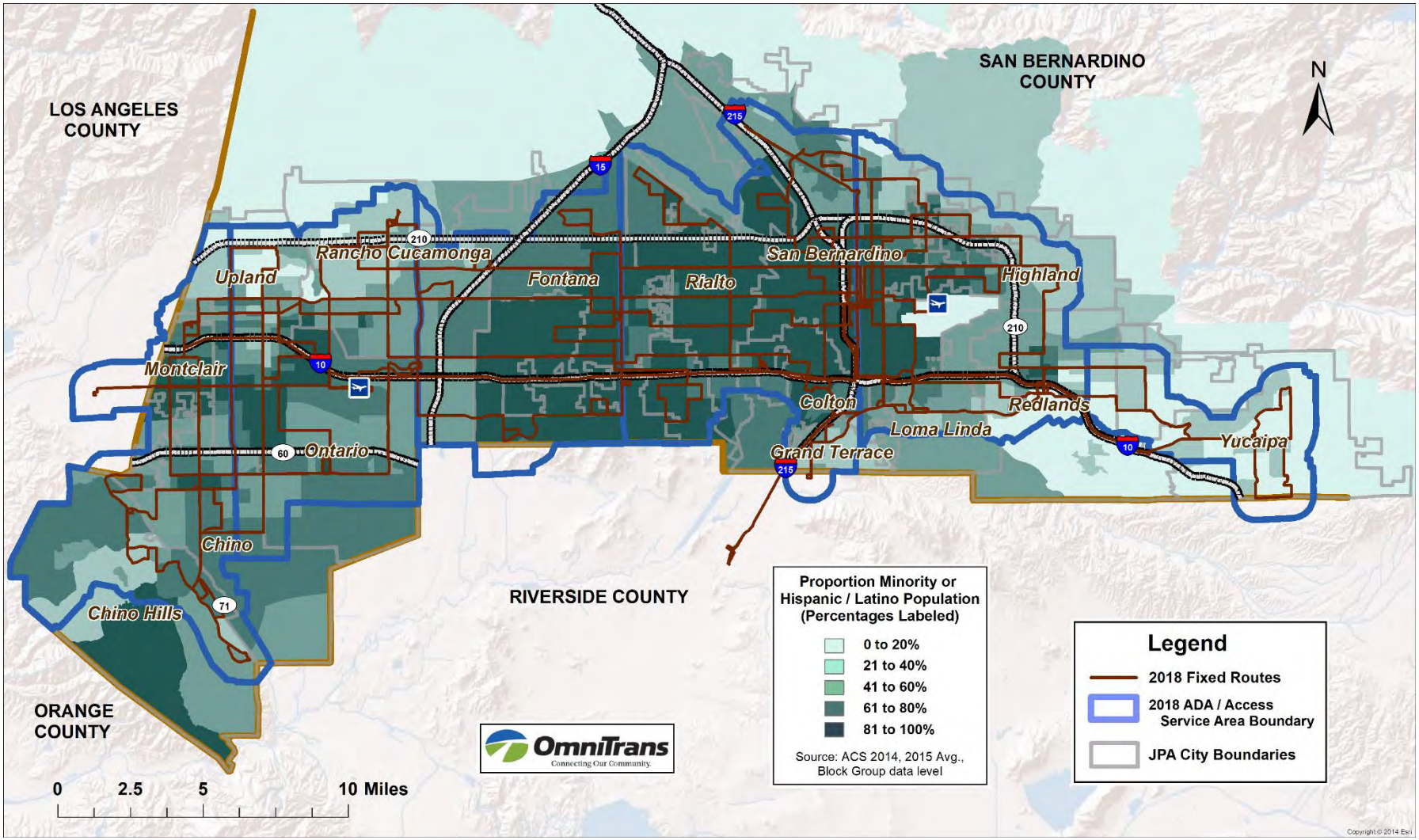


Exhibit 12: Percentage of Population Below Poverty by Census Block Group (Data from 2014 ACS 5-Year Estimate)

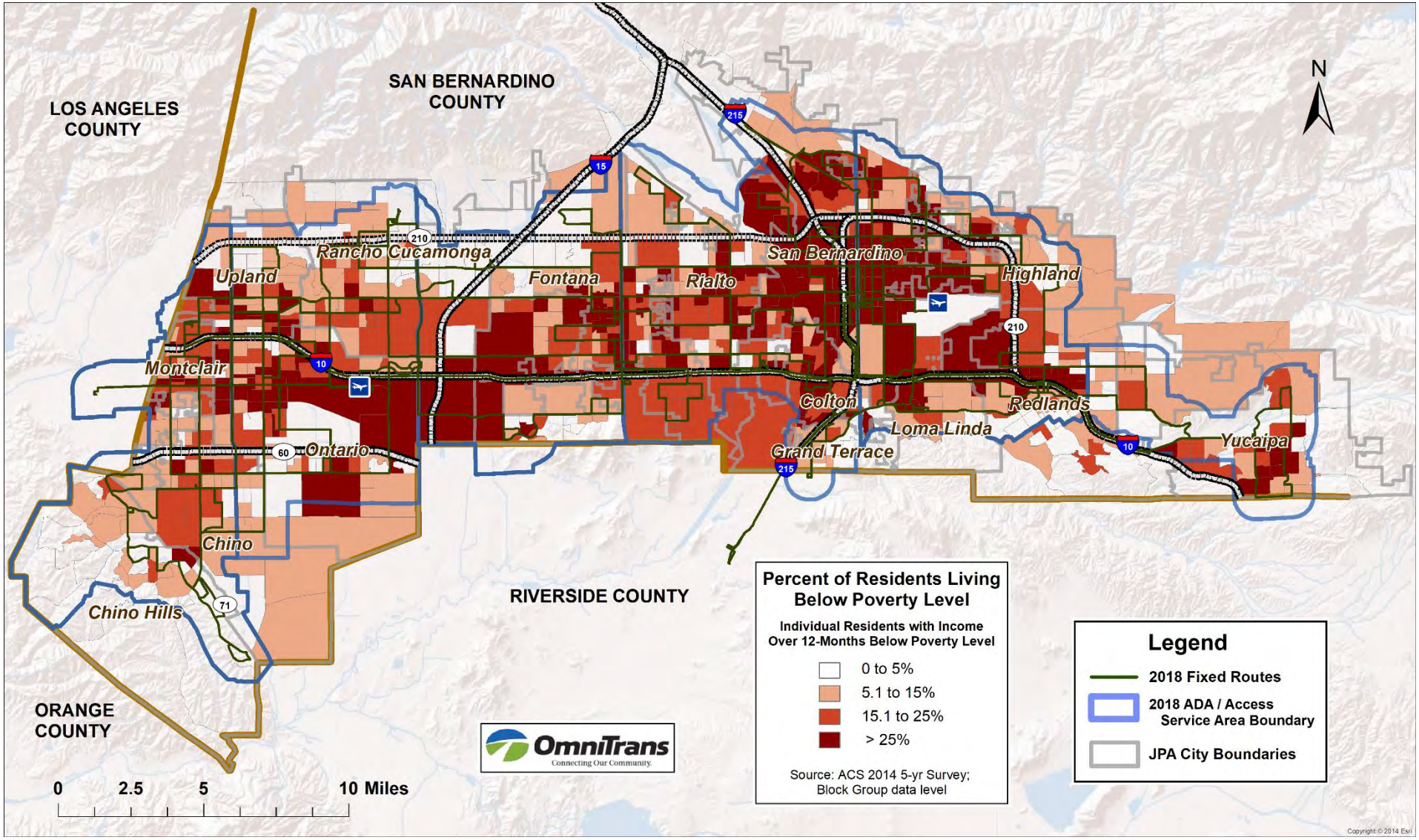


Exhibit 13: Percentage of LIM (Low Income White / Minority) by Census Tract and Block Group (Data from 2014 ACS 5-Year Estimate)

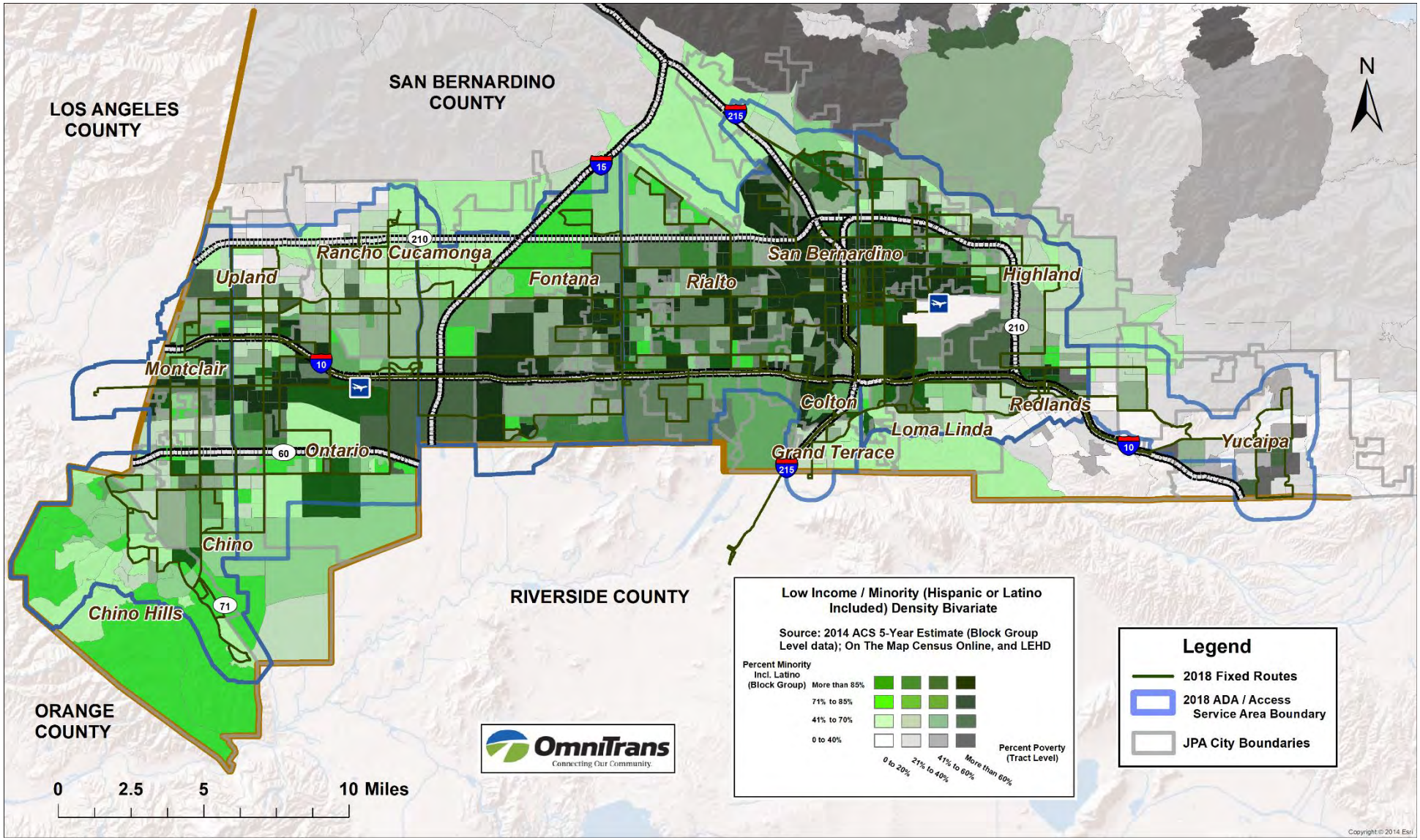


Exhibit 14 below shows the distribution of poverty within the San Bernardino Valley in terms of percentage of each city population living below the poverty threshold.

Exhibit 14: Percentage of Population Living Below the Poverty Line

CITY	%
San Bernardino	33.4%
Colton	22.1%
Highland	20.7%
Rialto	19.7%
Ontario	18.1%
Loma Linda	17.6%
Montclair	16.9%
Yucaipa	16.7%
Fontana	16.1%
Upland	15.5%
Redlands	14.3%
Chino	11.6%
Grand Terrace	9.9%
Rancho Cucamonga	8.8%
Chino Hills	6.5%

(2015 ACS Demographic and Housing 5-Year Estimates)

The City of San Bernardino had the highest rate of poverty, with 33.4% of its residents falling below the poverty line in 2015; the City of Chino Hills had the lowest rate of poverty (6.5%). Exhibit 15 and Exhibit 16 show the proportions among surveyed riders and residents in the County overall who possess licenses to drive and the vehicle availability by household. These data are taken from the latest Onboard Surveys by Redhill Group in 2011 and 2017, and from the 2015 ACS 5-Year Estimates. Notice the increase in vehicle availability in 2017 compared to 2011, which some analysts have argued may in some part be an effect of the passage of AB 60.

Exhibit 15: Driver's Licenses Status for Riders and County Overall, 2017

Personal Possession of Driver's License	Riders (n=4,440)	Overall County
Yes	43%	93%
No	57%	7%

Exhibit 16: Household Vehicle Availability, 2011 vs. 2017, Riders vs. Service Area Residents Overall

Vehicle Availability	Service Area Overall	2011 Riders	2017 Riders
Household Vehicle Available	95.8%	55%	61%
No Household Vehicle Available	4.2%	45%	39%

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:

- FTA §5307: Urbanized Area Formula Program;
- FTA §5310: Transportation for Elderly Persons and Persons with Disabilities;
- FTA §5339: Bus and Bus Facilities Discretionary Program; and
- CMAQ: Congestion Mitigation and Air Quality Improvement Program.

Omnitrans currently has open grants for the following discretionary funding programs under FTA:

- FTA Small Starts §5309(b)(1): Major Capital Investments;
- FTA (§5314(a) and FTA (§5339: Transit Planning and Research and Alternatives Analysis.

Omnitrans has pending applications under FTA formula funds for:

- FTA §5307: Urbanized Area Formula Program.

Civil Rights Compliance Review

Annual independent audit reviews were conducted for Omnitrans from 2015 to 2017, and were performed by Vavrinek, Trine, Day & Co., LLP, certified public accountants. FTA FY2016 triennial Review (2016) was conducted Calyptus Consulting Group, Inc. FTA Procurement System Review (2015) was conducted by Leon Snead & Company.

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, 2014, June 30, 2015 June 30, 2016, 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 FY2016 Triennial Review (2016) found that there were no material deficiencies. Thirdly, FTA PSR, conducted in 2015 by Leon Snead & Company, found that there were no material deficiencies; there were 8 findings which required corrective action, but all were corrected and accepted by the FTA.

The statement of rights, or the notification of beneficiary protection, under Title VI is provided to the public. It is found in the Bus Book, and a copy is located on each coach behind the coach operator's seat and translated into all seven safe harbor recognized languages of Omnitrans' service area.

Procedures for filing Title VI complaints have been updated and are available to the public; a copy of these procedures is also included in Appendix D of this Title VI Report, and can be obtained by clicking on a link on the Agency' web page and providing some contact information so that the material can be mailed. A request for the same can also be made directly by telephone. As well, the agency has updated its website so that such notification is made more

fully accessible to the public. This expansion of communicating of protections is 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 determining which languages fall under Safe Harbor definition within our service area.

With respect to procedures within the agency for collecting, investigating, and tracking complaints involving issues of discrimination or Title VI, Trapeze COM is also used to file, track, follow up, and log all complaints, including any involving acts of discrimination, or those involving complaints with specific 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. By employing this multi-pronged approach, it can be determined whether the complaint would fall within the definition of a Title VI service-level violation or not; in all cases, appropriate action is taken. Recently, ability on the part of the complainant to file a complaint independent of the Trapeze COM procedure has been incorporated as well. This procedure is more extensively described in the section: Record of Title VI Complaint Procedure, under Title VI Complaints. A table listing complaints tracked by Trapeze COM over the most recent triennial period is included in Appendix M of the separate Appendix Volume II.

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 by FTA. Major capital projects that do not fall under the category of CE are typically managed by the San Bernardino County Transportation Authority (SBCTA), which works in cooperation with Omnitrans to perform all required Environmental Assessments or Environmental Impact Statements under the close guidance of FTA officials.

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)

Omnitrans applies for local TDA Article 3 grants from the San Bernardino County Transportation Authority (SBCTA) every two years to construct transit stop access improvement projects, including sidewalk, concrete boarding areas, and curb ramps. The bus stop improvement projects are all categorical exclusions, as they are minor alterations to existing sidewalk. These

projects 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. Over the last triennial period, federal funding has been or is still being used to improve 64 bus stops throughout Omnitrans' service area.

Ruben Campos Park Bus Stop Improvements (non-federal funds)
Omnitrans used state funding to improve a bus stop in front of Ruben Campos Park on 5th Street in the City of San Bernardino. The improvements 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 Categorical Exemption under the California Environmental Quality Act (CEQA) CEQA was completed in September 2014. The City of San Bernardino granted an easement for the bus stop on the park property in January 2015. Caltrans granted an encroachment permit for the project in September 2016. The project was completed in September 2017.

San Bernardino Transit Center (federal funds)
The San Bernardino Transit Center (SBTC) is a multi-modal transportation hub in downtown San Bernardino at Rialto Avenue and E Street. It is served by 13 local bus routes, sbX Green Line bus rapid transit line, Metrolink, and other regional transit providers. The San Bernardino County Transportation Authority (SBCTA) led the design and construction of the project, under a pass-through funding agreement with Omnitrans. 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 Transit Center opened to the public in September 2015, followed by completion of an extension of the Metrolink San Bernardino Line and Inland Empire-Orange County Line to the Transit Center in December 2017.

A landscaping modification project and a back-up generator construction project are currently underway at SBTC. Both projects are currently in the bid phase; and construction of both projects is expected to be completed in FY 2019. Environmental clearance for both projects was covered in the above-mentioned environmental document for SBTC and the Downtown San Bernardino Passenger Rail project (2012).

West Valley Connector (federal funds)
The West Valley Connector is a bus rapid transit (BRT) project that will serve the cities of Fontana, Montclair, Ontario, Rancho Cucamonga and Pomona. The project includes enhanced stations, real-time arrival signage, surveillance and security systems, and transit signal priority systems. The project will be delivered in two phases. Phase 1 will serve the cities of Pomona, Montclair, Ontario, and Rancho Cucamonga and will include widening 3.5 miles of Holt Boulevard in the City of Ontario to construct dedicated bus lanes. Phase 1 will connect to two Metrolink stations on two different Metrolink lines (in Pomona and Rancho Cucamonga), a transfer center at Ontario Mills Mall, and the Ontario International Airport. Phase 2 will go through the cities of Ontario, Rancho Cucamonga, and Fontana, and will connect to the Ontario

International Airport, the Fontana Metrolink Station, and a major regional medical center in Fontana.

Both phases of the project, as well as a vehicle maintenance facility needed to accommodate the 60' articulated vehicles, are being cleared in the joint Environmental Assessment/Mitigated Negative Declaration. The draft environmental document is currently under review by the Federal Transit Administration and is expected to be completed in FY 2019. Construction of Phase 1 is expected to be completed in FY 2023. The project is being led through design and construction by SBCTA and will be operated by Omnitrans.

West Valley Connector Safe Routes to Transit Project (federal funds)
In FY 2015, Omnitrans was awarded a grant from the Federal Highway Administration through the State of California's Active Transportation Program. The purpose of the project is to construct bicycle and pedestrian improvements within ½ mile of future West Valley Connector bus rapid transit stations (Phase 1 and Phase 2 stations) in the cities of Pomona, Montclair, Ontario, Rancho Cucamonga, and Fontana. The project includes construction of sidewalk, replacement of curb ramps, striping of crosswalks, and installation of bike racks at future bus rapid transit station locations.

The project was certified as a Categorical Exemption/Categorical Exclusion in May 2016 through Caltrans. The Federal Highway Administration funds are in the process of being transferred to the Federal Transit Administration so that Omnitrans can manage the project as it manages other FTA-funded projects. The Safe Routes to Transit project is currently under construction and is expected to be completed in FY 2019.

Clean Natural Gas Pipeline Project (federal funds)
In FY 2018, Omnitrans completed construction of a clean natural gas (CNG) pipeline project to replace the Liquefied Natural Gas (LNG) tanks at Omnitrans' East Valley and West Valley vehicle maintenance facilities. This project met dual objectives of satisfying the local neighboring community members' desire for removal of the LNG tanks, and saving on fueling costs. The project included a generator, gas dryer, compressors, fueling islands, and safety features such as methane detection system, fail safe isolation valves, pressure relief devices, automatic and manual emergency shut-down, and 24/7 remote monitoring. The project was a design/build project, completed by the contractor GP Strategies.

Rialto Metrolink Improvements (federal funds)
The City of Rialto undertook a project in 2011 to expand the City's parking lot at the Metrolink station. The project was awarded federal funds, which are being passed through from Omnitrans to the City. Because of difficulty acquiring property from a private owner adjacent to the existing City lot, the City divided the project into Phase 1 and Phase 2. Phase 1 was completed in FY 2018; it involved the expansion of the parking lot onto land already owned by the City, and expanded the parking capacity by 122 spaces. Phase 2 will involve the construction of 100 more parking spaces on another nearby City-owned property, as well as ADA improvements at the platforms and throughout the station. Phase 2 also involves federal funds being passed through by Omnitrans. Construction of Phase 2 is expected to be completed

in FY 2019. Environmental clearance for the project has been completed; the project is a categorical exemption under the National Environmental Policy Act (NEPA).

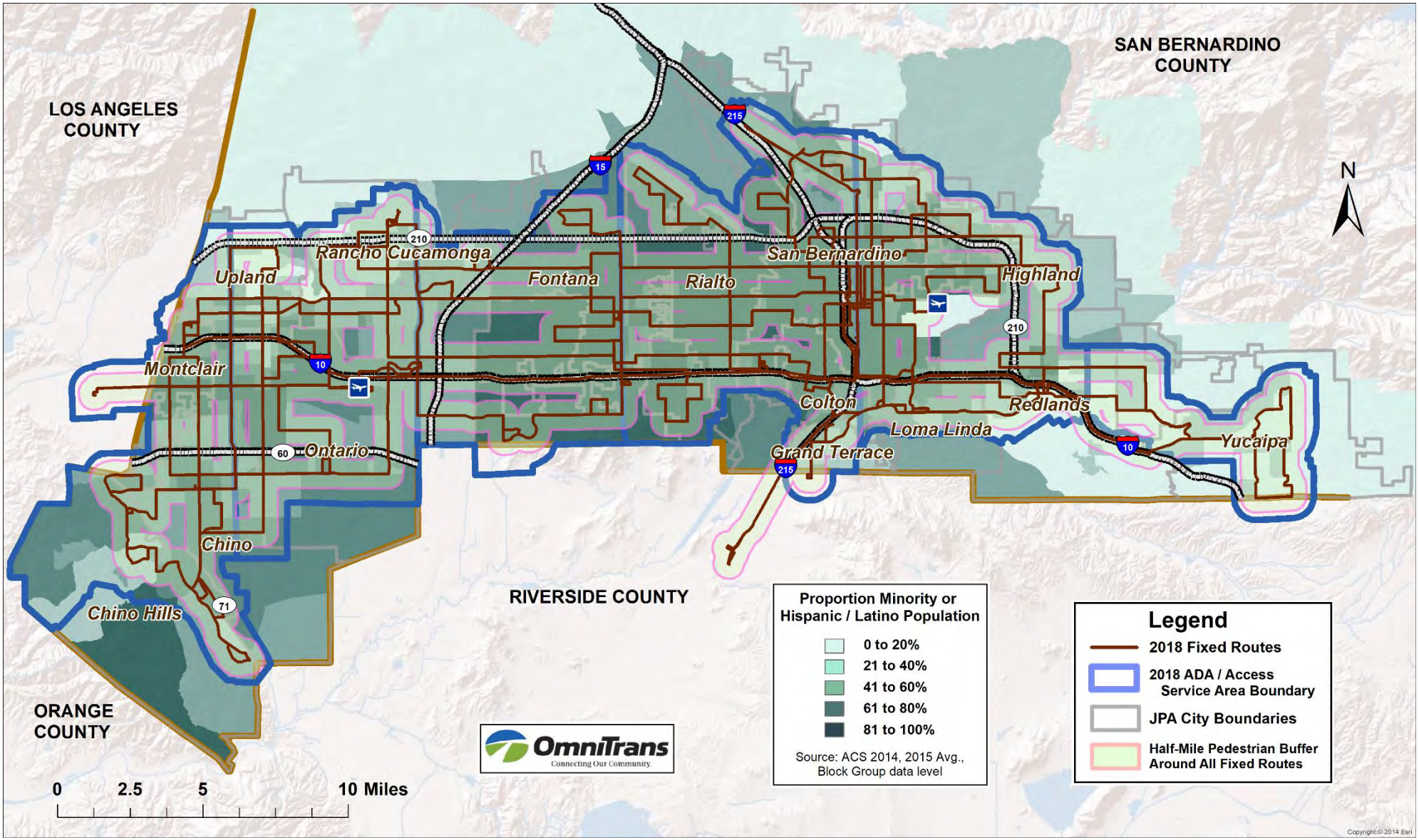
PROGRAM SPECIFIC REQUIREMENTS

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 (Exhibits 10-13).

Appendix G in the separate Appendix Volume II provides extensive Census data tables describing the Minority and Low Income White (LIM) Populations by census block groups and spatially related tracts. For a more detailed analysis of the LIM Population profiles of Omnitrans' service area, please see the Overall Triennial Service Equity Analysis and Assessment of Environmental Justice sections, beginning on page 42 of this report.

Exhibit 17: Percent Minority Population within a ½-Mile Walking Buffer of All Omnitrans Services



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 18 (taken from OmniConnects FY2015-2020 SRTP Performance Measures and Standards).

Exhibit 18: 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 36 seated and 18 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 19.

Exhibit 19: Maximum Occupancy by Bus Type and Number of Wheelchairs

Bus Type	No Wheelchairs	One Wheelchair	Two Wheelchairs
40' Low Floor (New Flyer)	43	42	38
60' Articulated Low Floor (XN60 New Flyer)	54	50	50

A summary of our Fixed Route Revenue Vehicles is provided in Exhibit 20. Since the last Title VI update and before, Omnitrans has retired our TMC, Thomas, and Orion coaches. As a result, our fixed route fleet consists entirely of New Flyer vehicles.

Exhibit 20: Fixed Route Vehicle Summary

Vehicle Type	Manufacture Date	Number in Fleet	Vehicle Length (Ft.)	Seats Available	Fuel Type
New Flyer	2001 - 2016	174	40.8	36	CNG
New Flyer, Articulated	2012	14	60	36	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 21, 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 21: Average Peak Loads by Time Period (Calendar Year 2017)

Route	AM Peak		Midday		PM Peak		Evening		Night	
	Load	Ratio	Load	Ratio	Load	Ratio	Load	Ratio	Load	Ratio
1	11	30%	15	43%	14	39%	11	30%	6	17%
2	10	27%	12	33%	11	32%	8	24%	7	20%
3	8	24%	10	29%	10	27%	8	24%	7	20%
4	10	30%	11	31%	9	26%	7	19%	5	15%
5	10	29%	10	29%	9	27%	6	17%	6	18%
7	9	26%	9	26%	8	22%	5	14%	1	4%
8	13	36%	14	39%	13	37%	8	23%	5	15%
10	11	31%	12	34%	12	34%	10	30%	NA	NA
11	10	28%	12	33%	11	30%	9	25%	6	17%
14	13	38%	15	43%	15	43%	17	48%	17	48%
15	12	34%	14	39%	13	36%	8	23%	6	16%
19	14	40%	15	44%	14	41%	10	28%	11	31%
20	6	16%	5	15%	5	15%	4	11%	NA	NA
22	6	17%	9	26%	8	23%	5	15%	3	10%
29	5	14%	6	16%	4	12%	1	3%	NA	NA
61	15	43%	16	45%	16	46%	12	35%	10	29%
66	12	35%	14	39%	14	40%	12	33%	10	27%
67	11	30%	11	33%	11	31%	7	21%	NA	NA
80	6	18%	9	25%	9	26%	6	16%	NA	NA
81	8	22%	10	29%	8	23%	7	21%	6	16%
82	13	36%	14	40%	13	37%	9	25%	NA	NA
83	9	26%	9	27%	9	24%	5	15%	7	21%
84	7	20%	8	23%	8	22%	5	14%	NA	NA
85	11	32%	13	36%	14	40%	8	23%	6	17%
86	8	24%	8	22%	8	23%	4	12%	NA	NA
88	8	22%	8	23%	9	25%	5	16%	3	9%
202 (sbX)	9	26%	14	41%	11	30%	8	22%	4	11%
208	3	7%	NA	NA	3	9%	3	8%	NA	NA
215	11	31%	13	36%	11	32%	8	24%	5	15%
290	9	25%	11	32%	9	25%	10	28%	NA	NA

Exhibit 22 shows On Time Performance (OTP) measures for all fixed routes in FY 2017 for which Automatic Passenger Count (APC) data was obtainable.

Exhibit 22: On Time Performance of Fixed Routes, FY2017

Route	On-Time Performance *(Year to Date as of May, 2018)*
1	90.0%
2	89.0%
3	86.9%
4	84.3%
5	89.5%
7	89.4%
8	80.2%
10	82.8%
11	89.6%
14	81.9%
15	84.0%
19	87.9%
20	89.0%
22	92.8%
29	90.7%
61	83.4%
66	88.3%
67	90.9%
80	90.6%
81	84.4%
82	76.5%
83	90.7%
84	92.4%
85	91.8%
86	83.7%
88	88.3%
202	71.6%
208	89.5%
215	86.3%
290	80.2%

Note: OmniGo circulator vehicles do not carry Automatic Passenger Counters; On Time Performance for them is not measured annually, nor in the same way

Exhibit 23 shows coach assignments by division as of March, 2018. Omnitrans' newest fixed route coaches that have been ordered since the last Title VI update have been dispersed equitably throughout both Omnitrans East Valley and West Valley Divisions. They are placed primarily where need requires, and they are never permanently assigned to any particular route. All new buses now have Automatic Passenger Count (APC) systems on board and they are randomly assigned to different routes in order to more accurately sample ridership by boardings and alightings, and as such shift routes recurrently.

Exhibit 23: Fixed Route Vehicle Series Type Assignments by Division

Series Type	Year - Make - Model	East Valley	West Valley	Total
00	2000 New Flyer C40LF	1	0	1
100	2001 New Flyer C40LF	14	6	20
150	2003 New Flyer C40LF	7	15	22
180	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
6001	2012 New Flyer XN60	14	0	14
1280	2014 New Flyer XN40	9	7	16
1301	2015 New Flyer XN40	15	0	15
1321	2016 New Flyer XN40	0	13	13
	TOTAL	122	66	188

Exhibit 24 shows vehicle assignments for our contract service fleet, which is employed for our demand response service and contracted fixed route service as of March, 2018.

Exhibit 24: Contract Services Vehicle Series Type Assignments by Division

Year - Make - Model	Active Coaches		
	East Valley	West Valley	Total
2008 Ford Starcraft	19	10	29
2009 Ford Aerotech	13	0	13
2012 Ford Starcraft	15	0	15
2015 Ford Starcraft	0	13	13
2015 Ford Starcraft	0	13	13
2017 Ford Starcraft	10	13	23
Total	57	49	106

System wide 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 length, coach operator access to vehicles, and the need to collect ridership data. APCs have been installed on 68 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.

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 sbX Green Line, 60-foot articulated vehicles are used exclusively; each of these articulated vehicles is low-floor with the capacity to board and alight on both sides of the vehicle. All coaches (40-, and 60-foot models) have bicycle racks; the 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, 60-foot articulated 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.

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.

Omnitrans' Fixed Route Headways for May 2018 are presented later in this report under Other Areas of Consideration, in Exhibit 31; the service span is presented, similarly, in Exhibit 32.

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 the LIM population within a one-half-mile pedestrian distance from all fixed route stops exceeds that of the surrounding region (80.3% LIM versus 73.3% LIM or the county). The LIM population share increases as the bus stop amenity level increases: the proportion of LIM population residing within one-half mile of all stops with benches also exceeds that of the surrounding area (81.6% versus 73.3%), and the proportion of LIM population residing within one-half mile of all stops with shelters exceeds that of the surrounding area (83.1% versus 73.3%). Analysis details can be seen in Exhibit 25. The mapping of this analysis can be seen in Exhibits 26-29.

The level of transit amenities at a given stop is determined on a stop-by-stop basis, and are placed based upon boardings per day and ADA accessibility standards. All stops have at minimum a sign designating which routes serve it 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 and available funding. As a result, more than one amenity will frequently be associated with a single stop.

Exhibit 25: LIM & Non-LIM Populations Served by Omnitrans Bus Stops, 2018

COMPARISON TO STOPS	TOTAL POP	Minority	% Minority	Low-Income White (Adjusted)	LIM	% LIM
3/4-Mile of Any Stop (May, 2018)						
Within	1,369,572	1,032,419	**75.4%**	57,220	1,089,639	**79.6%**
Not-Within	758,428	460,255	60.7%	10,630	470,885	62.1%
County Total	2,128,000	1,492,674	70.1%	67,850	1,560,524	73.3%
1/2-Mile of Any Stop						
Within	1,256,270	958,010	**76.3%**	51,386	1,009,396	**80.3%**
Not Within	871,730	534,664	61.3%	16,464	551,128	63.2%
1/2-Mile of Stops with Benches						
Within	1,027,723	797,106	**77.6%**	41,593	838,699	**81.6%**
Not Within	1,100,277	695,568	63.2%	26,257	721,825	65.6%
1/2-Mile of Stops with Shelters						
Within	739,839	584,722	**79.0%**	29,975	614,697	**83.1%**
Not-Within	1,388,161	907,952	65.4%	37,875	945,827	68.1%

Exhibit 26: Fixed Route Bus Stops and Percent Minority Population within Omnitrans Service Area

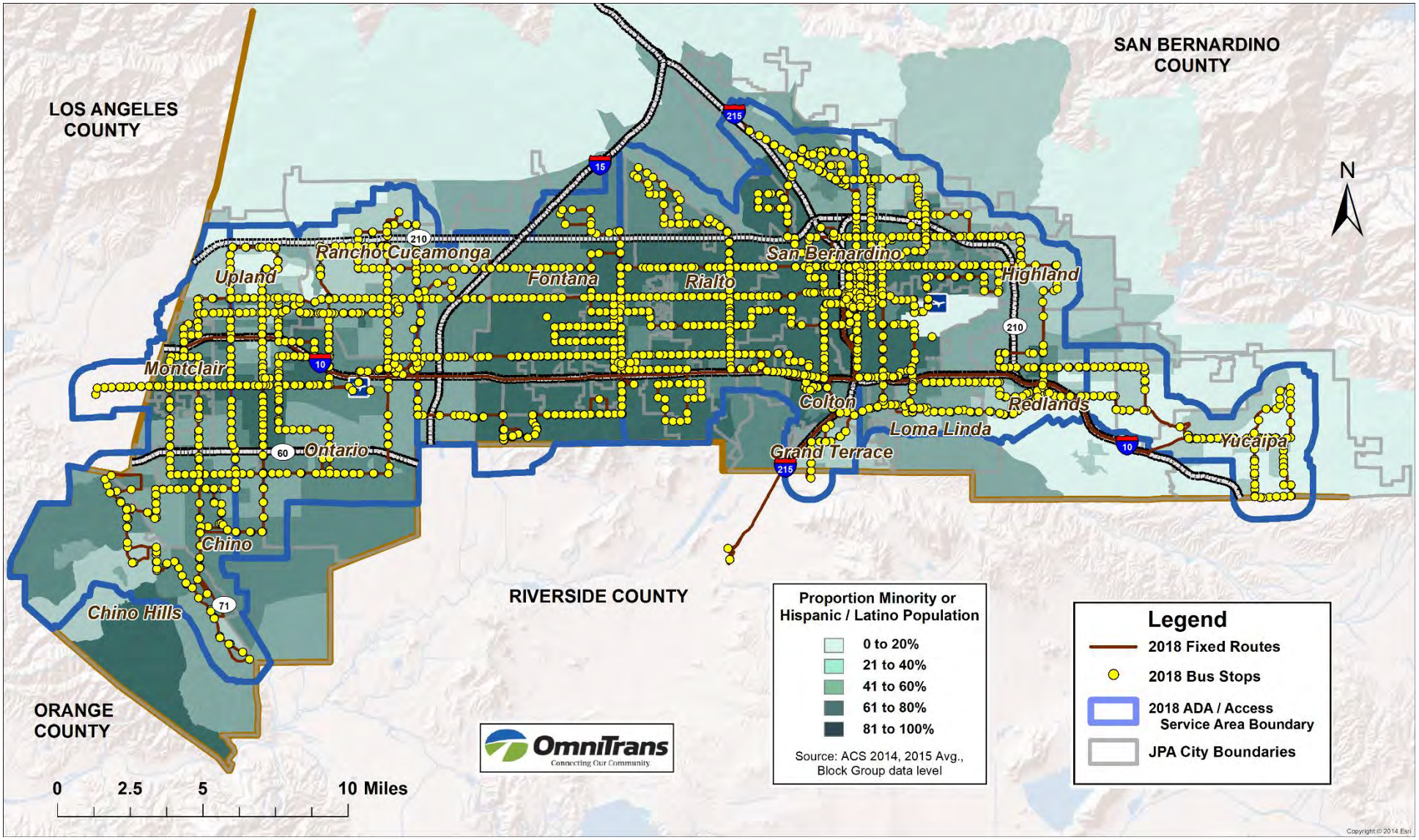


Exhibit 27: Fixed Route Bus Stops with ½-mile Pedestrian Buffer of Omnitrans Routes and Percent Minority Population

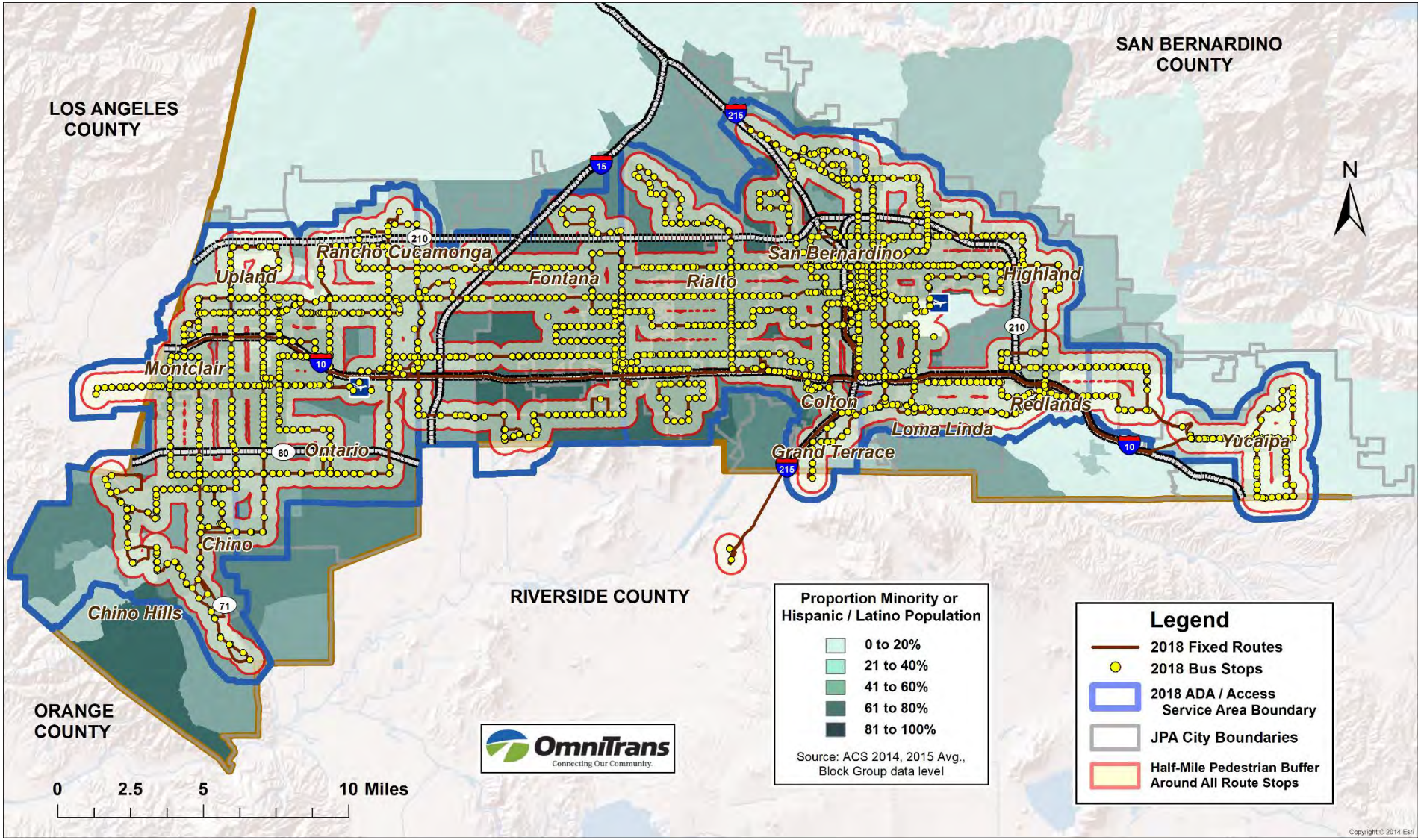


Exhibit 28: Fixed Route Bus Stops with Benches and Percent Minority Population within Omnitrans Service Area

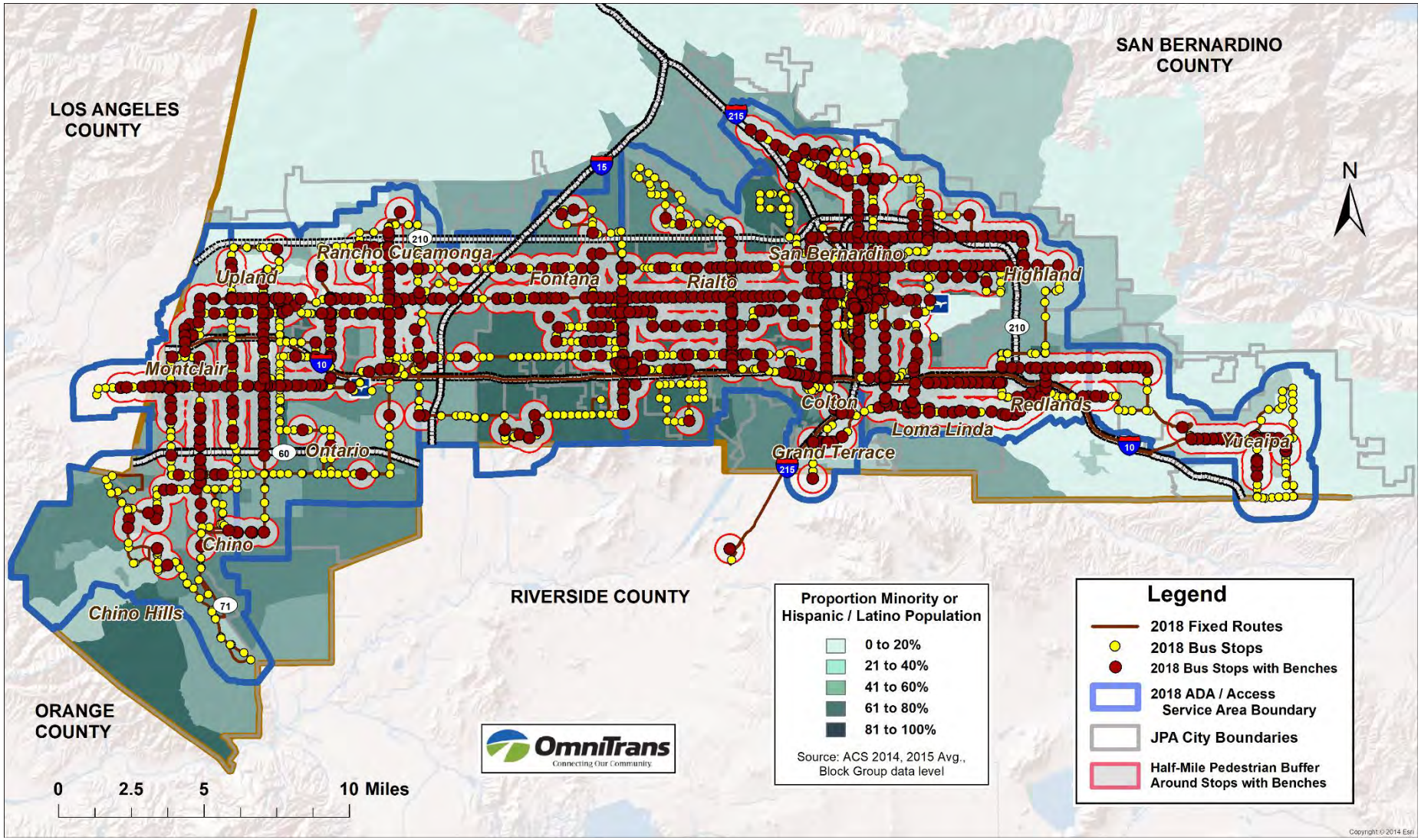
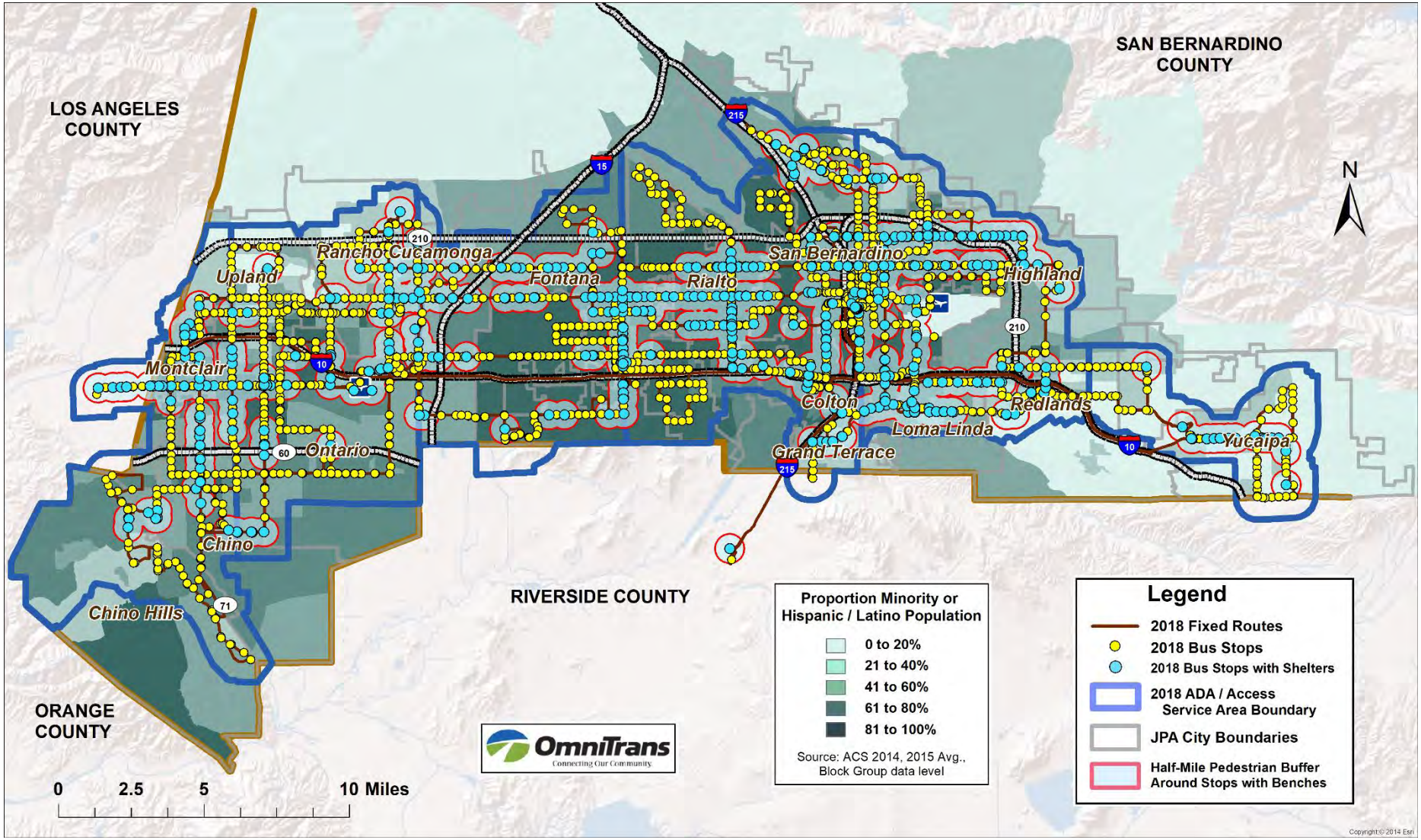


Exhibit 29: Fixed Route Bus Stops with Shelters and Percent Minority Population within Omnitrans Service Area



Currently, Omnitrans has 2,482 stops Of these, Omnitrans offers 1,121 stops with benches (45%) and 512 stops with shelters (21%). This is a substantial improvement over what Omnitrans offered in 2015, with an increase from 38% benches to 45% benches, and an increase from 19% to 21% of stops having shelters. Details by city can be seen in Exhibit 30.

Exhibit 30: Bus Stops and Bus Stop Amenities by City, 2018

City	Stops	Amenities	
		Benches	Shelters
Chino	121	35	25
Chino Hills	53	4	2
Colton	91	56	28
Fontana	314	154	76
Grand Terrace	23	9	7
Highland	76	46	19
Loma Linda	56	35	21
Montclair	71	43	25
Ontario	275	92	41
Pomona	16	7	6
Rancho Cucamonga	241	96	43
Redlands	103	50	16
Rialto	171	95	58
San Bernardino	611	310	125
San Bernardino County (no city)	61	6	0
Upland	114	51	3
Yucaipa	82	30	16
Other (Riverside County)	3	2	1
Total	2,482	1,121	512

Transit Accessibility

Omnitrans bus stops are typically placed every two-tenths of a mile along a route depending on operational access to it 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 along with other considerations, such as the proximity of certain important community resources and what are known as 'trip generators' (government buildings, libraries, agencies, etc.).

Direct requests for service assist Omnitrans in refining its fixed route service. These service requests come in the form of telephone calls, letters, customer comment cards, onboard surveys, comments through the Omnitrans website and social media, testimony, and public hearings. These requests are routed through Trapeze COM and identified as service requests. They are communicated to the appropriate department or departments for further action.

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, 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 and LIM communities in Omnitrans' service area also tend to be demographically denser, 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 2018 are presented in Exhibit 31 and the service span is presented in Exhibit 32.

Exhibit 31: Omnitrans Fixed Route Headways by Route as of May 2018

Route	Route Name	Headways		
		Weekday	Saturday	Sunday
Fixed Route EAST VALLEY				
1	ARMC-San Bernardino-Del Rosa	15/30	30	30
2	Cal State-E Street-Loma Linda	60	20	20
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
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	15
15	Fontana-San Bndo/Highland-Redlands	30	60	60
19	Yucaipa-Redlands-Colton-Fontana	30	60	60
20	Fontana Metrolink-Via Hemlock-Kaiser	60	60	60
22	North Rialto-Riverside Ave-ARMC	30	60	60
29	Bloomington-Valley Blvd-Kaiser	60	60	n/a
208	San Bernardino-Redlands-Yucaipa	AM/PM Peak	n/a	n/a
215	San Bernardino-Riverside	20/30	30/60	30/60
308/309	OmniGo Yucaipa	30/60	30	60
310	OmniGo Yucaipa	30/60	n/a	n/a
325	OmniGo Grand Terrace	70	70	70
sbX	Green Line (CSUSB - VA Hospital)	10/15	n/a	n/a
Fixed Route WEST VALLEY				
61	Fontana-Ontario Mills-Pomona	15	15	15
66	Fontana-Foothill-Montclair	15/30	30	30
67	Montclair-Baseline-Fontana	60	n/a	n/a
80	Montclair-Ontario Conv. Ctr.-Chaffey College	60	60	60
81	Ontario-Ontario Mills-Chaffey College	30/60	60	n/a
82	Rancho Cucamonga-Fontana-Sierra Lakes	60	65	65
83	Upland-Euclid-Chino	60	60	60
84	Chino-Mountain Avenue-Upland	60	60	60
85	Chino-Montclair-Chaffey College	30	60	60
86	S. Ontario-Campus-San Antonio Hospital	60	n/a	n/a
88	Chino Hills-Ramona Avenue-Montclair	60	60	60
290	San Bernardino-ARMC-Ontario Mills-Montclair Transit Center	AM/PM Peak	n/a	n/a
365	OmniGo Chino Hills	60	60	60

Exhibit 32: Omnitrans Fixed Route Service Span by Route (Revenue Times), May 2018

Route	Route Name	Service Span Weekday	Saturday	Sunday
Fixed Route EAST VALLEY				
1	ARMC-San Bernardino-Del Rosa	4:36-22:52	5:52-21:04	5:54-19:39
2	Cal State-E Street-Loma Linda	4:29-22:55	6:21-21:45	6:25-20:07
3	Baseline-Highland-San Bernardino	4:38-23:31	6:03-20:56	6:03-19:11
4	Baseline-Highland-San Bernardino	4:22-22:41	6:10-20:51	6:13-19:23
5	San Bernardino-Del Rosa-Cal State	4:39-22:42	6:33-20:29	6:33-19:36
7	N. San Bernardino-Sierra Way-San Bernardino	5:50-21:57	6:49-18:14	7:47-18:12
8	San Bernardino-Mentone-Yucaipa	4:53-22:39	6:17-19:24	7:22-18:56
10	Fontana-Baseline-San Bernardino	5:08-20:33	6:13-19:11	7:14-18:09
11	San Bernardino-Muscoy-Cal State	5:20-22:18	6:50-18:49	7:17-19:23
14	Fontana-Foothill-San Bernardino	3:33-23:11	6:03-22:34	6:04-20:26
15	Fontana-San Bndo/Highland-Redlands	5:05-22:38	6:36-19:31	6:41-19:25
19	Yucaipa-Redlands-Colton-Fontana	4:49-22:36	5:20-21:53	6:40-19:13
20	Fontana Metrolink-Via Hemlock-Kaiser	4:30-21:12	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	NA
208	San Bernardino-Redlands-Yucaipa	4:28-20:15	NA	NA
215	San Bernardino-Riverside	5:05-21:49	6:28-22:39	6:28-19:39
290	San Bernardino-ARMC-Ontario Mills-Montclair Transit Center	4:18-20:46	NA	NA
308	OmniGo Yucaipa	5:56-19:10	7:00-20:25	8:00-18:25
309	OmniGo Yucaipa	5:59-20:40	7:00-20:25	7:30-18:39
310	OmniGo Yucaipa	5:45-19:39	NA	NA
325	OmniGo Grand Terrace	5:12-20:36	7:17-18:12	8:17-18:12
sbX	Green Line (CSUSB - VA Hospital)	5:00-23:01	NA	NA
Fixed Route WEST VALLEY				
61	Fontana-Ontario Mills-Pomona	4:08-23:20	5:20-22:38	5:35-19:55
66	Fontana-Foothill-Montclair	4:10-23:15	5:47-22:15	5:48-20:07
67	Montclair-Baseline-Fontana	5:53-20:48	NA	NA
80	Montclair-Ontario Conv. Ctr.-Chaffey College	5:02-20:48	5:40-19:38	5:40-19:38
81	Ontario-Ontario Mills-Chaffey College	4:25-22:29	5:40-20:40	NA
82	Rancho Cucamonga-Fontana-Sierra Lakes	4:25-22:12	6:14-19:31	6:14-19:10
83	Upland-Euclid-Chino	5:54-21:45	5:54-20:50	5:54-19:48
84	Chino-Mountain Avenue-Upland	5:57-20:38	5:57-19:45	5:57-19:41
85	Chino-Montclair-Chaffey College	4:20-22:51	6:00-19:52	6:00-19:50
86	S. Ontario-Campus-San Antonio Hospital	4:45-21:44	NA	NA
88	Chino Hills-Ramona Avenue-Montclair	4:33-22:26	6:31-20:18	6:31-19:18
365	OmniGo Chino Hills	5:00-20:52	6:05-18:46	6:05-17:49

History of Recent Fixed Route Changes

Since the 2015 Title VI update, Omnitrans' fixed route service has been adjusted six times to a level warranting a service equity analysis. The changes Omnitrans has undergone during this period are shown in Exhibit 33. For each of these major service changes, Omnitrans completed a service equity analysis which was approved by its Board prior to the changes going into effect.

Exhibit 33: Major Changes from September 2015 to September 2018 and January 2019

MAJOR CHANGE	DATE IMPLEMENTED	Equity Analysis Completed
1. Route 290 begins service; San Bernardino Transit Center (SBTC) opened; some East Valley Routes' EOLs moved from 4th Street Transfer Mall to SBTC.	September 7, 2015	Yes
2. West Valley Service Changes: elimination of some routes (63, 65, 68); introduction of new routes (84, 85, 86); interlining of some routes (67, 80, 81, 83, 84, 85); and alignment changes or adjustments in others.	September 7, 2015	Yes
3. Realignment of Route 215 to coincide with RTA closing of its Transit Center in Downtown Riverside. New alignment serves same area & Metrolink Station.	January 2, 2017	Yes
4. Introduction of new Route 208, a peak-hour freeway express service from Yucaipa to SBTC.	May 1, 2017	Yes
5. September 2018 and January 2019; Alignment changes to Routes 14, 83, 86 (NOTE: Not a Major Service Change)	September, 2018	Yes
6. Adding of sbX Saturday service, and reduction in frequency of Route 2 weekend service.	January, 2019	Yes

The changes are more fully elaborated, following:

September 2015 Major Service Changes: As part of an effort to make routes more efficient and bring them closer to the Board approved 65%:35% productivity-to-coverage ratio in fixed route service, a major service change was undertaken to straighten routes that had grown to meander over the years, to reduce redundant service, and to increase efficiency along major north-south and east-west corridors. This primarily occurred in the West Valley portion of Omnitrans' service area. Some routes were eliminated, other new ones were introduced, some routes were interlined, and others experienced alignment changes or adjustments. Lower-productive portions of multiple routes were brought together, and lowered in frequency, while higher-productive portions of other routes were united and their frequencies increased, but in this process, coverage in any area was not lost. Specifically, routes 63, 65, and 68 were eliminated; routes 84, 85, and 86 were introduced; and routes 67, 80, 81, 83, 84, 85 were interlined. As well, a long-asked-for express route was introduced: Route 290. This route offered limited stop service along freeways from SBTC all the way westward to the Montclair Transit Center and back; it was designed to serve commuter needs during morning and evening

peak hours. The service equity analysis for this 2015 change was done in 2014, and was already included in the last triennial Title VI submission.

Realignment of Route 215 Southern EOL in Riverside: In January of 2017, Riverside Transit Authority (RTA) planned to close its downtown transit center (located near the intersection of Mission Inn and Fairmont). As coaches would no longer be able to use these facilities for rider pickup, drop-off, or transfer, it was incumbent upon Omnitrans to choose another site for its Riverside EOL for Route 215. Omnitrans realigned this southernmost EOL for the route along Mission, Orange, University, and then further down to 14th and Vine. With the two stops, Omnitrans was able to serve riders very close to the old RTA facility, and also to serve a facility riders had long requested: namely, the Riverside Metrolink Downtown Station off of Vine.

Introduction of Limited Stop, Freeway Express Service Route 208: In May of 2017, Omnitrans sought to meet a long-requested need on the part of commuters and implement a new peak-hour, limited stop, freeway express service, Route 208. This route was designed to transport riders from Yucaipa and Redlands more rapidly along the 10 Freeway to the Loma Linda University Medical Center and VA Hospital and to SBTC in downtown San Bernardino, and back. The route was intended to meet the needs of commuters from Yucaipa and Redlands who travel to and from work as far away as the West Valley and even into Los Angeles County. It is a peak hour service only.

Proposed Service Change for September of 2018. For September of 2018, alignment changes were proposed for routes 14, 83, and 86. These alignment changes were designed to meet local ridership needs, and were all minor in nature and did not affect 25% or more of the route or its ridership, and thus did not constitute major service changes. It was proposed to modify the easternmost portion of Route 14's approach to its EOL by moving the approach along D Street to E Street; this would reduce route redundancy along D Street, would reduce total trip distance and time slightly (thus bettering problematic On Time Performance for the route), and would improve transfers between Route 14 and sbX along the E Street corridor. It was also proposed to extend Route 83's northern EOL to circle and include the Colonies Crossroads shopping complex; the additional distance covered could be met with the excess time already on the route, and would better open up both shopping and employment opportunities to more riders at Colonies Crossroads. Finally, it was proposed to modify Route 86's alignment by moving it from along Campus to Bon View; this would allow the route to serve directly two facilities riders had long requested it to do: namely, the Dorothy A. Quesada Community Center, and the Baldy View ROP Career Training Center, which provides career technical education to high school students and adults. The service equity analysis for these changes was presented to Omnitrans' Board for approval in May of 2018.

Proposed Service Change for January of 2019. Starting in January, 2019, Omnitrans proposes introducing sbX BRT service on Saturdays. At present, sbX only operates on weekdays, but for some time, riders have been asking for the service to be extended to weekends as well. In order to make this change be as close to cost-neutral as possible, Omnitrans has also proposed reducing the frequency of parallel service of Route 2 on Saturdays from 20-minutes to 60-minutes, and on Sundays from 20-minutes to 30-minutes. The service equity analysis for this

proposed change was presented to Omnitrans' Board for approval in May of 2018, eight months before proposed implementation of this service change.

The respective service equity analyses for these changes 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 2015 to 2018 (excluding the September 2018 or January 2019 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 US Census data and demographic data acquired from the American Community Survey (ACS) 5-year estimates from 2014 and 2015 were 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 pedestrian 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 spatially- "linked" (or "related") census block group or tract level. As well, Exhibit 17 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-, 20-, 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 the commensurate "linked" ("related") census block groups or tracts (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 34 and Exhibit 35.

Exhibit 34: Low-Income / Minority Determination by Route Buffering Method

COMPARISON TO ROUTES	TOTAL POP	Minority	% Minority	Low-Income White (Adjusted)	LIM	% LIM
Population of County (ACS 2015 data)	2,128,000	1,492,674	**70.1%**	67,850	1,560,524	**73.3%**
Population of Service Area (Includes Area within ALL JPA Cities' Limits)	1,413,330	1,023,192	**72.4%**	64,265	1,087,457	**76.9%**
Population of ADA/Access Service Area	1,392,466	1,050,151	**75.4%**	57,791	1,107,942	**79.6%**
3/4-Mile of Any Fixed Route (May, 2018)						
Within	1,411,047	1,060,616	**75.2%**	58,749	1,119,365	**79.3%**
Not-Within	716,953	432,058	**60.3%**	9,101	441,159	**61.5%**
County Total	2,128,000	1,492,674	**70.1%**	67,850	1,560,524	**73.3%**
1/2-Mile of Any Service						
Within	1,270,063	965,209	**76.0%**	53,237	1,018,446	**80.2%**
Not Within	857,937	527,465	**61.5%**	14,613	542,078	**63.2%**
1/2-Mile of 10-, 15-, 20-, 30-Minute Service						
Within	931,526	717,394	**77.0%**	40,967	758,361	**81.4%**
Not-Within	1,196,474	775,280	**64.8%**	26,883	802,163	**67.0%**
1/2-Mile of 10-, 15-Minute Service						
Within	455,982	372,230	**81.6%**	19,904	392,134	**86.0%**
Not-Within	1,672,018	1,120,444	**67.0%**	47,946	1,168,390	**69.9%**
1/2-Mile of 10-Minute Service (sbX)						
Within	51,792	39,843	**76.9%**	3,571	43,414	**83.8%**
Not-Within	2,076,208	1,452,831	**70.0%**	64,279	1,517,110	**73.1%**

Exhibit 35: Low-Income / Minority Determination by Buffering of Route Stops Method

COMPARISON TO STOPS	TOT AL POP	Minority	% Minority	Low-Income White (Adjusted)	LIM	% LIM
Population of County (ACS 2015 data)	2,128,000	1,492,674	**70.1%**	67,850	1,560,524	**73.3%**
Population of Service Area (Includes Area within ALL JPA Cities' Limits)	1,413,330	1,023,192	**72.4%**	64,265	1,087,457	**76.9%**
Population of ADA/Access Service Area	1,392,466	1,050,151	**75.4%**	57,791	1,107,942	**79.6%**
3/4-Mile of Any Stop (May, 2018)						
Within	1,369,572	1,032,419	**75.4%**	57,220	1,089,639	**79.6%**
Not-Within	758,428	460,255	60.7%	10,630	470,885	62.1%
County Total	2,128,000	1,492,674	70.1%	67,850	1,560,524	73.3%
1/2-Mile of Any Stop						
Within	1,256,270	958,010	**76.3%**	51,386	1,009,396	**80.3%**
Not Within	871,730	534,664	61.3%	16,464	551,128	63.2%
1/2-Mile of Stops with Benches						
Within	1,027,723	797,106	**77.6%**	41,593	838,699	**81.6%**
Not-Within	1,100,277	695,568	63.2%	26,257	721,825	65.6%
1/2-Mile of Stops with Shelters						
Within	739,839	584,722	**79.0%**	29,975	614,697	**83.1%**
Not-Within	1,388,161	907,952	65.4%	37,875	945,827	68.1%

In addition to these two forms of LIM determination by way of buffering of the entire service area and selected cohorts of routes or stops, another form of LIM determination was performed. This was a determination of LIM-proportion profiles on a route-by-route basis, and was found to be invaluable for service equity analyses as a way to determine the effect of any proposed service change when single routes are involved. Exhibit 36, following, shows the results of this determination of LIM profiles by route.

Exhibit 36: Low-Income / Minority Demographic Profile by Fixed Route

COMPARISON TO ROUTES	TOTAL POP	Minority	Whites	% Minority	Low-Income White (Adjusted)	LIM	% LIM
Pop. of County (ACS 2015 data)	2,128,000	1,492,674	635,326	**70.1%**	67,850	1,560,524	**73.3%**
Pop. of Service Area (Includes Area within ALL JPA Cities' Limits)	1,413,330	1,023,192	390,138	**72.4%**	64,265	1,087,457	**76.9%**
Pop. of ADA/Access Service Area	1,392,466	1,050,151	342,315	**75.4%**	57,791	1,107,942	**79.6%**
CURRENT ROUTES							
1	78,963	66,944	12,019	**84.8%**	4,018	70,962	**89.9%**
2	62,545	47,459	15,086	**75.9%**	4,464	51,923	**83.0%**
3	121,928	101,816	20,112	**83.5%**	6,811	108,627	**89.1%**
4	120,998	102,452	18,546	**84.7%**	6,281	108,733	**89.9%**
5	71,272	56,038	15,234	**78.6%**	5,067	61,105	**85.7%**
7	49,121	38,122	10,999	**77.6%**	3,776	41,898	**85.3%**
8	53,538	23,727	29,811	**44.3%**	5,708	29,435	**55.0%**
10	99,989	90,696	9,293	**90.7%**	2,476	93,172	**93.2%**
11	60,886	54,072	6,814	**88.8%**	2,567	56,639	**93.0%**
14	79,501	71,228	8,273	**89.6%**	2,433	73,661	**92.7%**
15	133,184	110,893	22,291	**83.3%**	5,463	116,356	**87.4%**
19	135,030	97,648	37,382	**72.3%**	7,335	104,983	**77.7%**
20	49,869	45,053	4,816	**90.3%**	1,211	46,264	**92.8%**
22	57,834	49,736	8,098	**86.0%**	1,388	51,124	**88.4%**
29	32,368	27,697	4,671	**85.6%**	944	28,641	**88.5%**
61	100,189	88,362	11,827	**88.2%**	2,981	91,343	**91.2%**
66	102,092	73,832	28,260	**72.3%**	4,356	78,188	**76.6%**
67	105,241	73,406	31,835	**69.8%**	3,508	76,914	**73.1%**
80	59,150	36,781	22,369	**62.2%**	2,905	39,686	**67.1%**
81	84,731	58,102	26,629	**68.6%**	2,234	60,336	**71.2%**
82	104,157	84,724	19,433	**81.3%**	2,811	87,535	**84.0%**
83	81,284	60,366	20,918	**74.3%**	2,872	63,238	**77.8%**
84	79,253	56,836	22,417	**71.7%**	3,042	59,878	**75.6%**
85	122,722	86,957	35,765	**70.9%**	4,181	91,138	**74.3%**
86	86,251	70,017	16,234	**81.2%**	2,878	72,895	**84.5%**
88	57,494	46,267	11,227	**80.5%**	1,219	47,486	**82.6%**
sbX	51,792	39,843	11,949	**76.9%**	3,571	43,414	**83.8%**
208	10,913	5,329	5,584	**48.8%**	1,079	6,408	**58.7%**
215	10,695	7,299	3,396	**68.2%**	791	8,090	**75.6%**
290	9,240	7,440	1,800	**80.5%**	355	7,795	**84.4%**
308/309	28,679	10,362	18,317	**36.1%**	2,692	13,054	**45.5%**
310	17,099	6,156	10,943	**36.0%**	1,738	7,894	**46.2%**
325	33,744	21,575	12,169	**63.9%**	2,003	23,578	**69.9%**
365	55,033	38,460	16,573	**69.9%**	1,280	39,740	**72.2%**

NOTE: Data obtained from buffers placed about all stops associated with the specific route in question, and not about the route itself.
NOTE as well: Data obtained from ACS 2015 1-year estimate and 3-year average, from US Census Bureau

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. There are some exceptions on the part of individual routes and their respective LIM profiles, but this is due to the fact that the agency serves a heterogeneous region.

For all service, 75.2% (within ¾-mile of any fixed route) of the resident population is minority (versus 60.3% for the county overall) and 79.3% is LIM (versus 61.5% 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 77.0% and 81.4%, respectively, and for 10- and 15-minute service the respective proportions of minority and LIM residents rises again to 81.6% and 86.0%.

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 76.3% minority and 80.3 percent Low Income/Minority; this is greater than that to be found in the surrounding regions of the JPA cities (75.4% minority; 79.6% LIM) or the county, which would be 70.1% and 73.3%, respectively. 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 77.6% minority and 81.6% LIM populations, respectively, and for stops that include shelters, Omnitrans serves areas with minority resident proportions of 79.0% and LIM proportions of 83.1%, 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 76.9% and 83.8%, 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, blog and on social media (Facebook and Twitter). Social media presence has been greatly expanded over the last three years with Omnitrans' Facebook account, and this has served as an important new complementary means by which the public can communicate with the agency and receive word of any notifications of change.

For proposed changes, public hearings are required, and the public is also notified about these via public hearing flyers, among other means of information dissemination; an example of one of Omnitrans' LEP-translated public hearing flyers is included in Appendix-M along with the "Riding the Bus" Guide.

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 Interchange (a general public newsletter, emailed to a subscriber base), and public hearings that are held for proposed changes. Notices of change are also posted on Omnitrans' website and blog. 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, on board buses, online and through social media. 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; the number of language translations has increased over the last triennial period from 53 languages to currently over 100 languages of the user's choice. Spanish instructions for use of the translation program are included on the home page itself as well, and the website offers a web-based LEP section, too.

Omnitrans actively engages with its online audience on a variety of social media platforms; these are: Facebook, Twitter, Instagram, YouTube, and LinkedIn. 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 topical news and stories about the agency as well as personalized stories about passengers and how they use the bus service. These rider profiles 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 converted to a variety of other media, including audio, and mailed to an individual if a request is made.

The Omnitrans Board of Directors meet monthly (the first Wednesday morning of each month) 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.

Minorities on Decision-making Bodies

The majority of decision-making bodies Omnitrans is member to are composed of elected officials appointed according to their jurisdiction. The make-up of these bodies is primarily Caucasian. Approximately 26% of Omnitrans' Board of Directors are minorities and

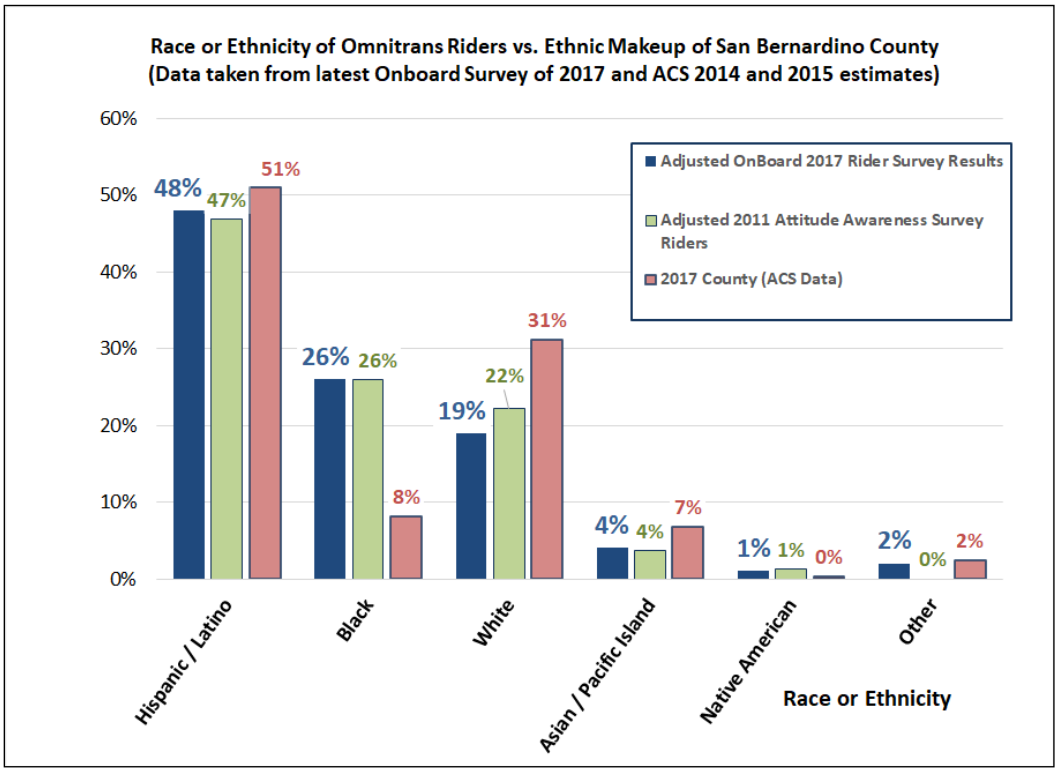
approximately 37% of Omnitrans' Board of Directors are women. Note that Omnitrans does not select and has no input into deciding the membership of its own Board.

Omnitrans is not member to any non-elected committee or council or decision-making bodies the membership of which would be selected by Omnitrans.

Survey Information of Customer Demographics

The more recent 2017 Onboard Survey done for Omnitrans by the Redhill Group was designed to reveal information about Omnitrans rider demographics. This was compared to what was known about the demographics of San Bernardino County overall, as obtained from the US Census ACS 2014 and 2015 3-year estimates. According to the Redhill Group survey, as shown in Exhibit 37 distinct differences are apparent between Riders the population of the county overall.

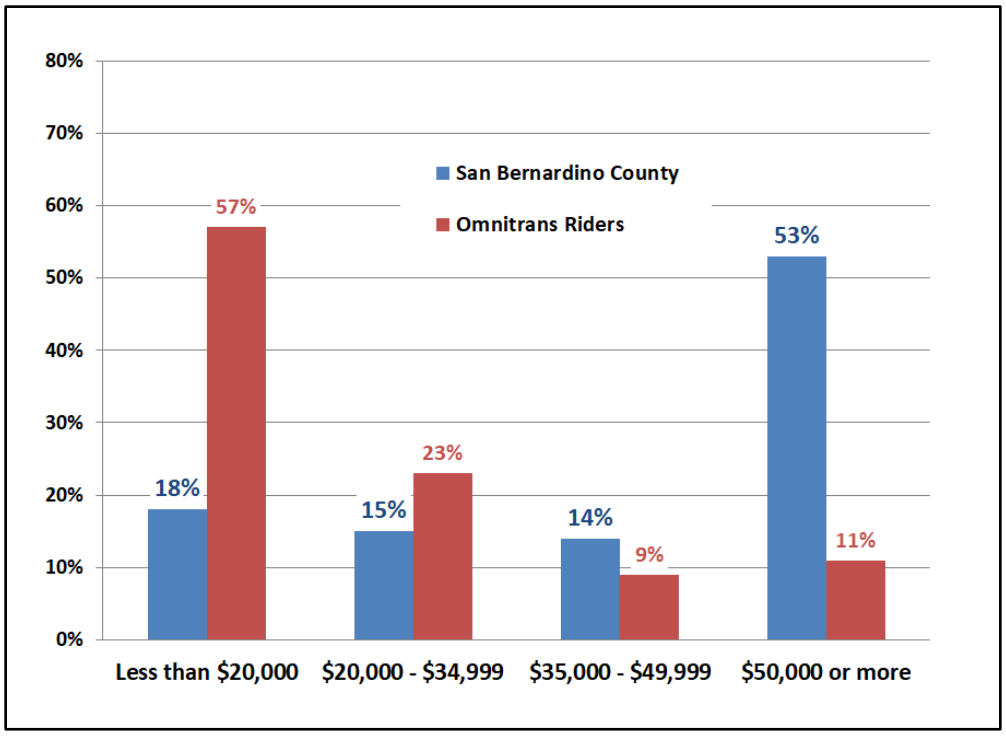
Exhibit 37: Comparison of Ethnicity of Omnitrans Riders in 2017 vs 2011, and vs Profile of County Ethnic Makeup Overall, 2017



According to these results, a far higher proportion of Omnitrans' ridership is derived from the minority community than is seen amongst the population in the county overall. 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 or black.

The majority of Omnitrans' surveyed riders reports an annual income of less than $35,000 (80%), and 57% report an annual income of less than $20,000. This varies markedly from the profile over the County as a whole, in which 53% of residents earn $50,000 a year or more (see Exhibit 38, following). This demonstrates that Omnitrans is serving low income residents.

Exhibit 38: Comparison of Annual Incomes for Omnitrans Riders vs San Bernardino County Residents



Multilingual Facilities

The Hispanic/Latino population makes up the greatest percent of the minority population in the Omnitrans service area (46%). Omnitrans has several communication tools for reaching 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 the

seven other LEP-designated 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 "Riding the Bus" 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 N in the accompanying Appendix Volume II 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 sometimes 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. Omnitrans also employs a translation service, AVAZA Language Services. Finally, Omnitrans' website, www.omnitrans.org, continues to use Google translate, which permits those who visit the site to translate the page; over the last triennial period, this has grown from 53 languages to more than 100 languages, and now offers a web-based LEP section as well.

The latest Public Outreach Policy (see Appendix R in the accompanying Appendix Volume II), which was commissioned through IBI Group and Arellano Associates for the 2008-2013 Short Range Transit Plan, delineates any concerns regarding public outreach, and offers extensive procedural direction for numerous venues. 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

Given the limitations of utilizing the most current of US Census data and its estimates very frequently, especially in regard to spatial and demographic distributions of different languages used throughout the Omnitrans Service Area, and given the extraordinary time and expense involved in frequent updating of Safe Harbor LEP language estimates, it was decided that updating the LEP Policy and Language Assistance Plan should be undertaken every ten years, as detailed demographic data becomes available through the US Census.

Omnitrans has put into place 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.

Omnitrans also has put in place a comprehensive LEP Policy and Language Assistance Plan, which is the foundation for our Limited English Proficiency outreach 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 implemented both an LEP Policy 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.

Some updates in the policy since the last report include the following:

1. Augmentation of the Google translate option for the Omnitrans' Web page. Initially, the translation tool was capable of translating the page into 53 different languages; now, it is capable of translating the same page into more than 100 languages.
2. Additional vital documents which are translated into the seven LEP Safe Harbor languages; these new ones include: Omnitrans' Official Title VI Complaint procedure, and the Omnitrans' official Title VI Complaint form.
3. Addition of copies of the multilingual "How to Ride" Guide on all coaches which coach operators can hand out to any riders who appear to require linguistic assistance. An electronic copy of this guide is included in Appendix Q of the accompanying Appendix Volume II. The guide provides basic instructional information for how to ride the bus, translated into all seven LEP Safe Harbor languages, as well as how to contact Omnitrans Bus Information.

As part of the comprehensive LEP Policy and Language Assistance Plan, Omnitrans performed a Four Factor Analysis of numbers and proportions of LEP riders within its service area. The Four Factor Analysis identified seven other LEP languages in Omnitrans' service area, in addition to the English language: 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 *"Riding the Bus"* 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).
7. Omnitrans' official Title VI Complaint procedure.
8. Omnitrans' official Title VI Complaint Form.

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. An electronic copy of the AVAZA Language Services Corp page which is indicative of the service it offers plus the original scope of work for AVAZA are included (along with the "Riding the Bus" Guide) in Appendix M. 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 complaints which may be of a Title VI nature, 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 public communication registration and compilation program. Salient excerpts from Omnitrans protocol for Complaint Procedures for Trapeze COM, Title VI Additions follow:

Omnitrans' Official Title VI Complaint Procedure.

In order to fill a procedural gap that was identified, Omnitrans has formally developed a specific Title VI complaint procedure. This is in addition to the identification of complaints taken that may be received by other means. Normally, the agency can and does receive public comments, suggestions, service recommendations, feedback of all types, and complaints through a number of channels. Historically, this has been primarily via the information desk at the front of the East Valley main facility, or by way of Trapeze COM. The advantage of using Trapeze COM is that all public input or feedback received through it is recorded, including Title VI and discrimination complaints, and identified as to what type it might be; from this categorization, specific types of feedback can be isolated and acted upon more effectively. The disadvantage is that this method favors either direct verbal interaction through the front desk information center, or by mail or telephone. Sometimes, however, a complainant may not feel comfortable using such a vehicle by which to register a complaint, or may not be able to do so. For this reason, our agency has expanded the means by which a potential complainant can register a complaint. Recently, social media has been enlisted more fully as another means for registering feedback and complaints with the agency, including those of a Title VI nature.

Even these means for registering complaints, which lend themselves more fully to record keeping and tracking, might not be options amenable to all complainants. Some who wish to file a complaint might not feel comfortable doing it face-to-face, or over the telephone, or even registering it with the agency directly. For this reason, Omnitrans has formally developed a complaint procedure which allows for the complainant to disregard Trapeze COM and make the complaint by form sent by mail, and even to forward / mail the complaint directly to the FTA. Both procedure and form may be requested by anyone through Omnitrans' website. On the website's *Contact Us* page, the following clickable link is offered:

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 ***1-(800) 9-OMNIBUS*** (***1-800-966-6428***).

Omnitrans' Official Title VI Complaint procedure and form are included in Appendix N; a record of complaints of a putative Title VI nature and of the follow-up actions taken in each case during the last triennial period are included in Appendix G.

Title VI Complaints (received via Trapeze COM).

If a complaint comes in through Trapeze COM, it may be identified further as either a Title VI or as a general Discrimination complaint. From that point, there is a process for following up on the complaint and determining if it falls under the umbrella of a true Title VI complaint. The procedure for this determination follows.

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). If the complaint is construed as valid, customer contact is initiated, and if necessary, a formal Title VI complaint form may be forwarded to the complainant.

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 (which often times consists of intentional discrimination), and disparate impact (which often involves unintentional treatment), respectively.

A. Immediate Service Level Complaint (Potential 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, or 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, an investigation, and imposition of progressive discipline. In those cases where it is appropriate and possible, 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 in the form of progressive discipline is taken, the complainant is often contacted in a follow-up, 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 or accused employee is contacted and counseled. If necessary, further action in the form of progressive discipline is taken; these disciplinary actions can range up to and include termination of employment for the offending coach operator or accused employee. If Omnitrans failed to follow this course of action with consistency or at all, and allowed the problem to become widespread amongst many operators, or permitted one or more operators to continue such infractions without corrective response and subsequent improvement in or amelioration of the situation, the agency would be guilty of disparate treatment, and this would constitute a true Title VI violation.

B. Broad Planning/Policy Level Complaint (Potential 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. In these types of incidents, a minority group is experiencing disparate impact as the result of agency-wide policies. 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), and Omnitrans does nothing about it.
2. Omnitrans never has materials printed in my language, and my language is one of the LEP-recognized safe-harbor languages in Omnitrans' LEP Policy by way of the Four-Factor Analysis.

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.
5. By implementing some change in service, the agency is having a disparate impact upon minorities over non-minorities, and this is provable demographically.

Comments of this nature will be flagged as potential Title VI complaints and forwarded to the Transit Planner. A copy of the record of putative Title VI complaints, and of the follow-up actions taken in each case during the last triennial period, is included in Appendix G.

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. The agency 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.

Unlike what is the case with many other direct recipient pass-throughs of federal funding, Omnitrans' sub-recipients are generally not public transit agencies in their own right (exception: Victor Valley Transit). Instead, most of these entities have been fairly small organizations with mandates to transport disabled or senior individuals to specific workshops, or to transport very ill patients to medical centers for treatment, or they have been using the funding to complete a local transit upgrade or to improve local stops.

Note that there have been some changes in the status of sub-recipients in the last three years: a number of transit projects on the part of cities which had been funded with the respective cities as sub-recipients before 2015 have run to completion. The projects from the last Triennial update in the cities of Needles, Fontana, and Ontario have been completed and closed out as a sub-recipient funding. Highland is no longer a sub-recipient because the City turned down federal funds. A new sub-recipient agreement has been initiated with the City of Upland for one of its transit-oriented projects, but the city has not forwarded an invoice for the work done, and so they have not used these funds. SBCTA has received some sub-recipient funding from Omnitrans for the San Bernardino Transit Center, and that agreement has not been closed out yet. Loma Linda University Medical Center (LLUMC) Adult Day Health Services was a patient transportation program; as of 2016 they no longer were a funding sub-recipient. Valley Transportation Services (VTRANS) has been brought into the agency as the Special Transit Services (STS) department, and is now under Omnitrans auspices and receives funding directly, and no longer as a sub-recipient.

The following list gives the names of entities which have been Omnitrans sub-recipients over the last triennial period, and describes their activities and what their sub-recipient pass-through of funding was used for.

San Bernardino County Transit Authority (SBCTA): This sub-recipient (SBCTA) uses operating grant funds for subsidizing qualified lease payments on a monthly basis for a vanpool program. SBCTA's Program Vanpool is a group of five to 15 commuters who share a ride to and from work or post-secondary school. The participants share the cost of the service, or their employer may subsidize all or part of the costs. The vans that are leased range from seven passengers up to 15-passenger models.

Pomona Valley Workshop: Pomona Valley Workshop (currently known as Anthesis) is a nonprofit corporation which gives adults with disabilities opportunities to blossom within a caring, nurturing, and supportive community. Anthesis operates an In-Motion transportation program that provides round trips to Pomona Valley Workshop clients with disabilities from home to job sites and/or programs.

Central City Lutheran Mission (CCLM): Central City Lutheran Mission (CCLM) is a unique community-based organization established in 1994 by a group of five Lutheran churches and a number of other community partners and committed to serving the people living in poverty in San Bernardino, California. Among its many programs is a local transportation program dedicated to scheduling and transporting HIV and AIDS clients for medical and work related trips in San Bernardino.

Community Senior Services: Community Senior Services is a 501(c)3 non-profit organization that provides a broad array of programs, services, and support for older adults, caregivers, and others interested in enhancing aging services throughout the Inland, Pomona and East San Gabriel Valleys. Community Senior Services operates a Volunteer Driver Program. This program provides service to senior and disabled residents of the west San Bernardino Valley whose transportation needs are not met by existing transit and para-transit services. The Project allows riders to recruit and select their own drivers and will provide eligible riders with a mileage stipend used to defray the drivers' out of pocket cost.

United Way: United Way is a non-profit organization which fights for the health, education, and financial stability of every person in every community. United Way has created an outreach campaign and a new position which acts as a liaison between their transit users and potential transit users, social service providers who will need transportation for their clients, and their various, respective transit providers.

OPARC: OPARC is a non-profit 501(c)3 organization established in 1950 to support, employ, and transform the lives of people with disabilities. OPARC employs these sub-recipient operating funds to enhance the OPARC Connects transportation service that it uses to transport OPARC clients to the Work Activity program. Capital funds are to be used to purchase vehicles for the program.

Victor Valley Transit (VVTA): Victor Valley Transit Authority (VVTA) is a public transit agency and Consolidated Transportation Services Agency (CTSA) providing bus, ADA paratransit, and vanpool services to the communities of California's High Desert. In addition to its fixed route service, VVTA operates two additional lifeline services: **SB-Lifeline** and **B-V Link**. These services provide additional lifeline weekday trips from Victorville to San Bernardino. These trips connect residents of the Victor Valley and Barstow areas to the greater San Bernardino Valley. Omnitrans' pass-through funding helps to fund these lifeline services.

City of Rialto-Metrolink Station Expansion: These sub-recipient funds were awarded for the Rialto Metrolink Station expansion. This expansion adds approximately 230 parking spaces to the existing parking lot, which currently has 175 spaces. The project expands into two new locations and converts 11 existing general parking spaces to seven (7) new handicapped parking spaces. When completed, the additional parking area would be a single-level macadam lot.

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 K1 gives an example of the sub-recipient annual FTA compliance self-certification form Omnitrans uses in the certification process.

Exhibit 39 following, gives the record and schedule of sub-recipient inspections for the last year.

Exhibit 39: Sub-Recipient Title VI Program Compliance

Sub-recipient	Responsible Staff	Current Title VI Program?	Date Title VI Program Collected
SBTCA (formerly SANBAG) - San Bernardino Intermodal Transit Center	Senior Financial Analyst	Yes	8/29/2017
Pomona Valley Workshop	Senior Financial Analyst	Yes	8/19/2017
Central City Lutheran Mission	Senior Financial Analyst	Yes	10/12/2017
Community Senior Services	Senior Financial Analyst	Yes	8/7/2017
United Way	Senior Financial Analyst	Yes	8/9/2017
City of Rialto- Metrolink Station Expansion	Senior Financial Analyst	Yes	9/14/2017
OPARC	Senior Financial Analyst	Yes	9/11/2017
Victor Valley Transit (VVTA)	Senior Financial Analyst	Yes	8/11/2017

Appendix O and Appendix P in the separate Appendix Volume II give all the sub-recipient monitoring records and documents, including site visit summaries and all self-certifications, from over the last three years.

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 two categories which allow Omnitrans to track and evaluate potential Title VI complaints. Trapeze COM is one of the ways in which putative Title VI complaints can be received and addressed. In the last three years, from August 1, 2015 (the time of the last triennial Title VI submission) to May 18, 2018 Trapeze COM has flagged more than 2,600 customer feedbacks which were identified specifically as being 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-five contacts were flagged as being discrimination complaints, and of *potential* Title VI interest, and a total of one contact was flagged and identified as being a putative Title VI complaint, and of potential Title VI interest as a possible valid Title VI complaint. These data were derived from records kept in Trapeze COM from August 1, 2015 to May 18, 2018. The single contact which was self-identified as a possible Title VI complaint—from its original contact—will be described and elaborated upon, following. The sum of these complaints (56 in total) equated to less than two-percent of all negative customer contacts (complaints) accrued during this period, and as per Omnitrans' policy, all 56 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. 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.

The single, self-identified putative Title VI incident which was received over the last three years was one which might be considered a potential Broad Level Title VI complaint of disparate impact or disparate treatment due to Omnitrans' service, planning, or policy level decisions. However, due to incomplete complaint and contact information, there was no way to resolve it, and it remains open. This was a complaint received by way of telephone on June 22, 2017, and it might have been a follow-up to a complaint made on May 13 of 2017. In the May 13 complaint, the customer stated that when he and a companion boarded the coach on Route 1, southbound, the coach operator could not honor an ADA / Access card and charge them the disabled fare rate, but that the two riders would have to pay full fare, in spite of the fact that the card had been accepted in the past. This customer felt that the driver was discriminating against him based upon his race or ethnic origin, and demanded a call back from a supervisor. It is not clear if the June 22 call was connected to the May call, as the customer in the June call could not give a clear or coherent complaint in spite of repeated request. This complainant never identified the nature of the complaint, did not identify herself or give her address or contact information, and refused to register her complaint through Trapeze COM.

As reported, Omnitrans has received comparatively few complaints of discrimination (roughly two-percent of all complaints) 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 generally to 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 counseling from supervisors, supervisorial ride-alongs, and annual refresher training. Repeated complaints can lead to progressive discipline and ultimately to termination for recalcitrant cases. See Appendix G for records 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 continues to be prominently displayed in all Omnitrans' coaches for riders to read, and is in seven LEP-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.

Ongoing Training of Agency Personnel in Title VI Protocols

Owing to the natural turnover in Agency personnel over time, and the general need for employees to be refreshed in Title VI protocols, Omnitrans has put in place an ongoing program of training for its employees—both one for those who interact most closely with the public (coach operators, information personnel, etc.), and another one for second-line support personnel who do not interact as closely with our riders or customers.

An example of PowerPoint presentations used as part of regular training of Omnitrans' employees in the Title VI Program is contained in Appendix S in the accompanying Appendix Volume II.

Documentation of Board Approval of Omnitrans' Title VI Program

Documentation of Omnitrans' Board of Directors' Approval of its Title VI Program is contained in Appendix F.

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 4702.1B 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 9/13/18

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 _____ 7/13/18 _____

P. Scott Graham, CEO/General Manager Date

Appendix-C: 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-D: TITLE VI COMPLAINT FORM

1700 W. Fifth St.
San Bernardino, CA 92411
909-379-7100
www.omnitrans.org

TITLE VI COMPLAINT PROCEDURES

Omnitrans has developed this set of procedures for receiving, investigating and tracking Title VI complaints.

Any person who believes that he or she has been discriminated against on the basis of race, color, or national origin by Omnitrans may file a complaint by submitting a completed Customer Contact Form, by submitting the Contact Us Form at Omnitrans.Org, or by submitting a verbal complaint over the telephone to Omnitrans' Information Desk. This must be done within 180 calendar days of the date of the alleged discrimination. Complaints must state as fully as possible the facts and circumstances surrounding the alleged discrimination and must be signed by the complainant or his/her representative. Online or telephone complaints will require a signed response to the follow-up acknowledgement letter.

Upon receiving the complaint, Omnitrans will provide the complainant or his/her representative with an acknowledgement letter within 14 calendar days. Following this acknowledgement letter, Omnitrans will investigate the complaint to determine if it is a potential Title VI violation.

According to Title VI of the Civil Rights Act of 1964, Omnitrans cannot discriminate against individuals based on race, color, or national origin. For a complaint to rise to the level of a Title VI complaint and potential violation, it must indicate disparate treatment or disparate impact due to intentional or unintentional discrimination. This can include long-term or immediate issues of discrimination that Omnitrans fails to resolve, or policy-level issues of disparate service or treatment. A complaint which falls under one of these categories will be regarded as having merit for evaluation except under the following circumstances: unless it clearly appears on its face to be frivolous or trivial; Omnitrans voluntarily concedes noncompliance and agrees to take appropriate remedial action; within the time allotted, the complaint is withdrawn; or, other good cause for not investigating the complaint exists. For monitoring purposes, the complaint will be documented as a Title VI complaint.

Omnitrans will complete the review process and determine the complaint's merit, and inform the complainant of its decision in a Finding Letter or email within 30 calendar days of the date of the acknowledgement letter. In the event a decision is made to not investigate the complaint, the notification shall specifically state the reason for the decision. In the event the complaint is to be investigated, the notification shall inform the complainant that an investigation will take place, and may request additional information needed to assist the investigator in preparing for the

investigation. Omnitrans must receive requested information within 21 calendar days of the date of notification requesting addition information. The complainant's failure to provide additional requested information may result in Omnitrans closing the case administratively. A complaint can be administratively closed as well if the complainant no longer wishes to pursue his/her complaint.

If the complainant wishes to appeal the decision after this, she/he has 30 calendar days after the date of the Finding Letter to do so in writing to Omnitrans Customer Service Manager at 1700 W. 5th St, San Bernardino CA 92411.

A person may also file a complaint directly with the Federal Transit Administration at:

FTA Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC 20590.

Title VI Complaint Form

Omnitrans is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by Title IV of the Civil Rights Act of 1964, and as amended. **Title VI complaints must be filed within 180 days from the date of the alleged discrimination**.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form and filing a written complaint, contact our Customer Service Representatives at 800-966-6428 or 909-379-7100, or by visiting the main Omnitrans East Valley facility on Fifth Street at Medical Center Drive.

The completed form must be returned to **Omnitrans attn: Title VI - Customer Information Desk, 1700 W. Fifth Street, San Bernardino, CA 92411.**

Your Name:	**Phone:**
Street Address:	**Alternate Phone:**
City, State & Zip Code:	
Person(s) discriminated against (if someone other than complainant): **Name(s):**	
Address:	**Phone:**
Date of Incident:	**Bus #/Route/Location (if applicable):**

Continued on reverse side…

Which of the following best describes the reason for the alleged discrimination taking place? (Check one)

_____ Race

_____ Color

_____ National Origin (Limited English Proficiency)

Please describe the alleged discrimination incident. Provide the names and title of all Omnitrans representatives involved if available. Explain what happened and identify who you believe was responsible. Please attach an additional sheet of paper if more space is required.

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

Have you filed a complaint with any other federal, state or local agencies? **Yes___ No ___**

If yes, list agency/agencies and contact information below:

Agency/Agencies:	**Contact Name:**
Address:	**Phone:**

I affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Signature: _____ **Date:** _____

Appendix-E: Title VI Statement of Rights in Seven Languages (and Shown on Omnitrans Coach)

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 diche 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 នៃច្បាប់សិទ្ធិពលរដ្ឋឆ្នាំ 1964
យោងតាមចំណងជើងទី VI នៃច្បាប់សិទ្ធិពលរដ្ឋឆ្នាំ 1964 ទីភ្នាក់ងារអូមនីត្រេនេស៍ (Omnitrans) ហាមឃាត់អាកប្រឹងប្រែងរើសអើងលើមូលដ្ឋានជាតិសាសន៍, ពណ៌សម្បុរ, និងសញ្ជាតិដែលមានពាក់ព័ន្ធនឹងកម្មវិធី និងសកម្មភាពនានាដែលទទួលជំនួយហិរញ្ញវត្ថុរបស់សហព័ន្ធ។ ដើម្បីសុំនូវព័ត៌មានអំពីនីតិវិធីសម្រាប់ការដាក់ពាក្យបណ្តឹង ឬដើម្បីជូនដំណឹងដល់ទីភ្នាក់ងារ Omnitrans អំពីការរំលោភបំពានច្បាប់តាមការចាប់អារម្មណ៍ណាមួយ សូមទាក់ទងផ្នែកព័ត៌មាន Omnitrans តាមទូរស័ព្ទលេខ (800) 966-6428។

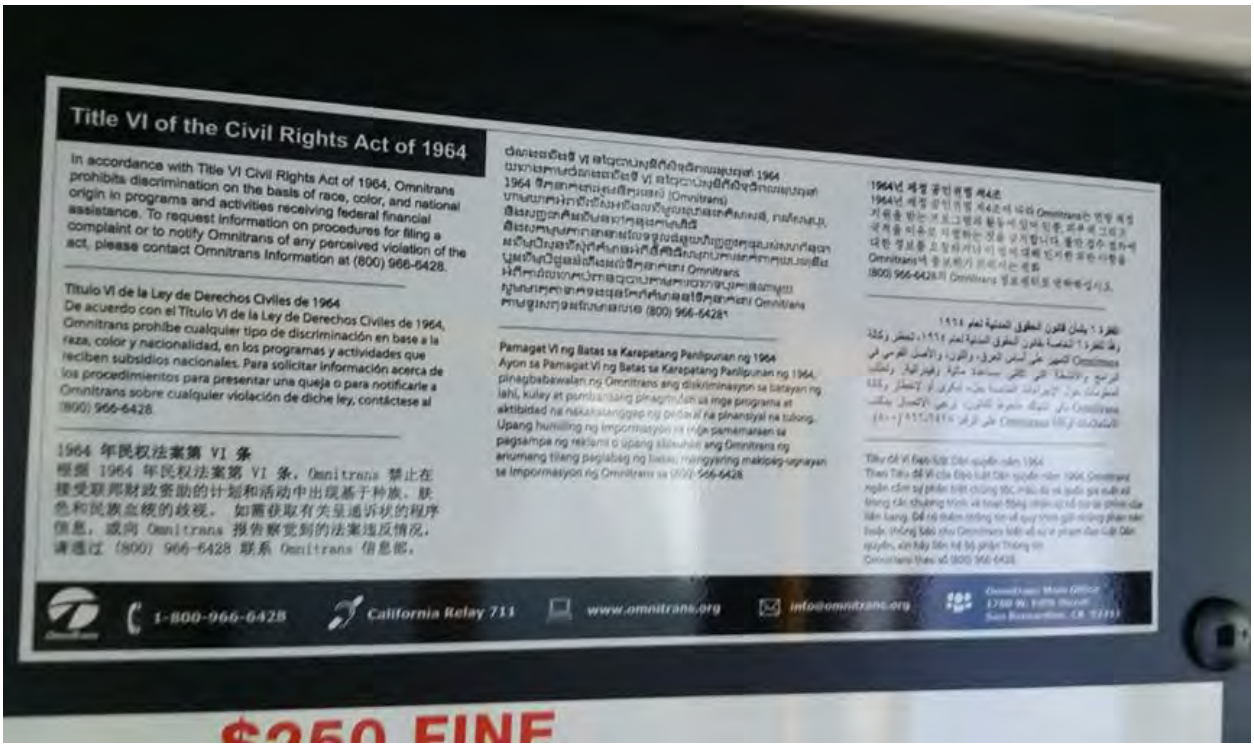
Pamagat VI ng Batas sa Karapatang Panlipunan ng 1964
Ayon sa Pamagat VI ng Batas sa Karapatang Panlipunan ng 1964, pinagbabawalan ng Omnitrans ang diskriminasyon sa batayan ng lahi, kulay at pambansang pinagmulan sa mga programa at aktibidad na nakakatanggap ng pederal na pinansiyal na tulong. Upang 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
وفقًا 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. ولطلب 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 phàn 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.

Omnitrans | 1-800-966-6428 | California Relay 711 | www.omnitrans.org | info@omnitrans.org | Omnitrans Main Office, 1700 W. Fifth Street, San Bernardino, CA 92411



Appendix-F: Board Minutes Documenting Approval of Triennial Title VI Program

OmniTrans
Connecting Our Community.

1700 W. Fifth St.
San Bernardino, CA 92411
909-379-7100
www.omnitrans.org

DATE: September 12, 2018

TO: Lynette Little, Civil Rights Officer, Region IX, Federal Transit Administration

FROM: Araceli Barajas, Executive Staff Assistant (Clerk of the Board)

SUBJECT:

This letter is to certify that the 2018 Title VI Triennial Report was approved by the Omnitrans Board of Directors at its September 5, 2018 meeting. The minutes of this meeting will be available after October 3, 2018.

Respectfully submitted,

Araceli Barajas
Executive Staff Assistant (Clerk of the Board)

Attachments: Board Staff Report – Triennial Title VI Report for Submission to the FTA

OmniTrans
Connecting Our Community.

1700 W. Fifth St.
San Bernardino, CA 92411
909-379-7100
www.omnitrans.org

APPROVED
9/5/18 AB

ITEM # E11

DATE: September 5, 2018

TO: Board Chair Ron Dailey and Members of the Omnitrans Board of Directors

THROUGH: P. Scott Graham, CEO/General Manager

FROM: Wendy Williams, Director of Marketing & Planning

SUBJECT: **TRIENNIAL TITLE VI REPORT FOR SUBMISSION TO THE FTA**

FORM MOTION

Adopt the Triennial Title VI Report for submission to the Federal Transit Administration (FTA).

This item was reviewed by the Plans and Programs Committee at its July 25, 2018 meeting, and recommended to the Board of Directors for approval.

BACKGROUND

As a recipient of FTA funding, Omnitrans is required to fulfill Title VI requirements as outlined in the FTA Circular FTA C 4702.1B, dated October 1, 2012, and as originally set forth in Section 601 of Title VI of the Civil Rights Act of 1964. These requirements include reporting at a minimum triennially regarding compliance with Title VI, by demonstrating that the Agency does not discriminate, exclude from, or deny service based on race, color, or national origin.

The attached Triennial Title VI Report (Attachment A) demonstrates that Omnitrans is in compliance with the FTA's Title VI requirements. It shows that the Agency serves minority and low-income populations equitably and does not impose either a disparate impact or disproportionate burden by way of discriminatory actions, planning or policies.

Included with this report are all equity analyses performed over the last three years, record of all discrimination and potential Title VI complaints made against the Agency over the same period, and record of efforts taken to meet our Limited English Proficiency (LEP) and Language Assistance Plan mandates.

In each previously performed and board approved equity analysis, Omnitrans demonstrated compliance with its Title VI obligations. Each reported case of potential Title VI complaint resulted in an unsubstantiated Title VI claim.

For the triennial period of 2015 to 2018, an overall spatial analysis was conducted comparing populations of Low-Income and Minority groups (LIM) with the presence of transit services to determine whether Omnitrans met Title VI regulations. GIS analysis was used to map the service

area including all fixed routes and stops. One-half-mile buffers were generated about all route stops, and demographic analysis was performed by using data from the US Census' American Community Survey (ACS) 2014 and 2015 5-Year Estimates. The results of the overall analysis are shown in Exhibit 1.

Exhibit 1 Low-Income / Minority (LIM) Proportion Determination by Buffering of Route Stops

COMPARISON TO STOPS	TOTAL POP	Minority	% Minority	Low-Income White (Adjusted)	LIM	% LIM
Population of County (ACS 2015 data)	2,128,000	1,492,674	70.1%	67,850	1,560,524	73.3%
Population of Service Area (Includes Area within ALL JPA Cities' Limits)	1,413,330	1,023,192	72.4%	64,265	1,087,457	76.9%
Population of ADA/Access Service Area	1,392,466	1,050,151	75.4%	57,791	1,107,942	79.6%
3/4-Mile of Any Stop (May, 2018)						
Within	1,369,572	1,032,419	75.4%	57,220	1,089,639	79.6%
Not-Within	758,428	460,255	60.7%	10,630	470,885	62.1%
County Total	2,128,000	1,492,674	70.1%	67,850	1,560,524	73.3%
1/2-Mile of All Stops						
Within	1,256,270	958,010	76.3%	51,386	1,009,396	80.3%
Not Within	871,730	534,664	61.3%	16,464	551,128	63.2%
1/2-Mile of Stops with Benches						
Within	1,027,723	797,106	77.6%	41,593	838,699	81.6%
Not-Within	1,100,277	695,568	63.2%	26,257	721,825	65.6%
1/2-Mile of Stops with Shelters						
Within	739,839	584,722	79.0%	29,975	614,697	83.1%
Not-Within	1,388,161	907,952	65.4%	37,875	945,827	68.1%

The results of the overall analysis show that the numbers and proportion of Low-Income and Minority (LIM) residents found within the established buffer regions around stops clearly exceed, in each case, that found within San Bernardino County as a whole, within the larger Service Area defined by the JPA city boundaries, and within the ADA/Access Service Area boundary. Omnitrans' distribution of bus stop amenities also shows a higher proportionality of LIM residents.

The percent minority and percent LIM values for the ADA/Access Service Area are 75.4% and 79.6%, respectively; the same percentages for ½-mile buffers from all stops, for stops with benches, and for stops with shelters all exceed them (76.3%, 77.6%, and 79.0%, in the first case; and 80.3%, 81.6%, and 83.1% in the second). This evidence demonstrates that Omnitrans is not discriminating in its actions or in its service planning against minority populations within its service area.

Submitting this Triennial Title VI Report allows Omnitrans to remain in compliance with its Title VI requirements; therefore, staff recommends that the Board of Directors adopt the Triennial Title VI Report for submission to the Federal Transit Administration (FTA).

CONCLUSION

An adopted Triennial Title VI Report is required by the FTA for Omnitrans to continue to receive federal funding; therefore, staff recommends that the Board of Directors adopt the Triennial Title VI Report for submission to the Federal Transit Administration (FTA).

PSG:WW:JB:SB