

**CITY OF MANTECA
MANTECA TRANSIT
2021 Title VI Program**

(Fiscal Years 2021-2022 to 2023-2024)

Final Report

August 2021

*Adopted by the Manteca City Council
August 17, 2021*

Prepared by
Moore & Associates, Inc.
25852 McBean Pkwy, Suite 187
Valencia, CA 91355
888.743.5977

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Manteca Transit operates fixed route and Dial-a-Ride bus service throughout Manteca with stops at key locations throughout the city.

This document was prepared by Moore & Associates, Inc., on behalf of the City of Manteca. It has been adopted by the City of Manteca City Council to comply with Title VI of the Civil Rights Act of 1964, including recent provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients."

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Section 1 | Introduction

The City of Manteca: Manteca Transit Policy Statement

The City of Manteca is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended.

The purpose of this Title VI Program is to establish guidelines to effectively monitor and ensure that the City's transit services, commonly known to the public as Manteca Transit, are in compliance with FTA Title VI requirements.

Title VI states that "no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." The FTA is required to ensure that federally supported transit services and related benefits are provided consistent with Title VI. The Title VI Report requires an update every three years.

The City (Manteca Transit) will ensure that its programs, policies, and activities comply with Department of Transportation's (DOT) Title VI Regulations (49 CFR Part 21) and with Limited English Proficient (LEP) Persons requirements (70 FR 74087, December 14, 2005). The City is committed to creating and maintaining a public transportation system that is free of all forms of discrimination. The City will take necessary preventive corrective and disciplinary actions to stem behavior that violates this policy or the rights and privileges it is designed to protect. FTA requires recipients to documents compliance with DOT Title VI regulations by submitting a Title VI Program once every three years.

Environmental Justice Requirements

City of Manteca shall integrate an environmental justice analysis into its National Environmental Protection Act (NEPA) documentation of construction projects. For projects where NEPA documentation is not required, the City of Manteca will prepare an environmental assessment (EA) or environmental impact statement (EIS) assessing potential disparate impact and disproportionate burden when performing construction projects. The EA or EIS will integrate into its documents the following components:

- A description of the low-income and minority population within the study area affected by the project, and a discussion of the method used to identify this population (e.g., analysis of Census data, direct observation, or a public involvement process);
- A discussion of all adverse effects of the project both during and after construction that would affect the identified minority and low-income populations;
- A discussion of all positive effects of the project that would affect the identified minority and low-income populations, such as improvements in transit service, mobility, or accessibility;
- A description of all mitigation and environmental enhancement actions incorporated into the project to address the adverse effects, including, but not limited to, any special features of the relocation program that go beyond the requirements of the Uniform Relocation Act and address

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adverse community effects such as separation or cohesion issues; and the replacement of the community resources destroyed by the project;

- A discussion of the remaining effects, if any, and why further mitigation is not proposed; and
- For projects that traverse predominantly minority and low-income and predominantly non-minority and non-low-income areas, a comparison of mitigation and environmental enhancement actions that affect predominantly low-income and minority areas with mitigation implemented in predominantly non-minority or non-low-income areas.

In addition, the State of California, through the California Environmental Quality Act (CEQA), requires state and local agencies to identify the significant environmental impacts of their actions and to avoid or mitigate those impacts, if feasible. When NEPA documents are prepared, the City will also comply with CEQA regulations.

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Section 2 | Title VI Notice to the Public and Locations Where Displayed

The City of Manteca’s Title VI Notice to the Public is currently posted at the locations listed in Exhibit 2.1.

Exhibit 2.1 List of Locations Where Title VI Notice Is Posted

Location	Address
Manteca Transit buses	----
Manteca Transit Center	220 Moffat Boulevard, Manteca
Manteca Transit Rider’s Guide	----
City of Manteca Website	www.mantecatransit.com

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Title VI Notice to the Public

Exhibit 2.2 Title VI Notice to the Public



manteca *transit*

City of Manteca
Public Works Dept.
Transit Division
220 Moffat Blvd.
Manteca, CA 95336
(209) 456-8888

Notice to the Public Your Rights Under Title VI

Manteca Transit operates its programs and services without regard to race, color and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Manteca.

For more information on the City of Manteca's Civil Rights program and the procedures to file a complaint, please contact us at:

City of Manteca, Public Works Department, Transit Division
220 Moffat Boulevard
Manteca, CA 95336
(209) 456-8775
transitadmin@ci.manteca.ca.us
www.mantecatransit.com

A complaint may be filed directly with the Federal Transit Administration by contacting:

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor-TCR
1200 New Jersey Avenue, SE
Washington, D.C. 20590

If information is needed in another language, please contact (209) 456-8775 or email transitadmin@ci.manteca.ca.us


Para informacion en Español por favor llame al (209) 456-8775 or email transitadmin@ci.manteca.ca.us

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Exhibit 2.3 Title VI Notice to the Public (Online)




CITY OF MANTECA COVID-19 BUSINESS I WANT TO ... RESIDENTS DEPARTMENTS

City Of Manteca > Development Services > Manteca Transit > Manteca Transit Title VI Program



Bikes On Buses
Bus-Shelter-Advertising
Dial-a-Ride (ADA Paratransit)
Fixed Route Service & Fares
Frequently Asked Questions
How To Ride The Bus
Manteca Transit Center Rental ▶
Manteca Transit Title VI Program
News and Events
Regional Transportation ▶
Request For Proposal
Short Range Transit Plan



Manteca Transit Title VI Program

Manteca Transit operates its programs and services without regard to race, color and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Manteca. [Click here for more information about your rights under Title VI.](#)
[Click here for the City of Manteca Title VI Program](#)

For more information on the City of Manteca's Civil Rights program and the procedures to file a complaint, please contact (209) 456-8775; e-mail transitadmin@ci.manteca.ca.us; or visit the Manteca Transit Center at 220 Moffat Boulevard 95336. [Click here for the City's Civil Rights Complaint Procedure](#)

A complaint may be filed directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590. [Click here for the City's Civil Rights Complaint Form](#)

If information is needed in another language, please contact (209) 456-8775.
Para informacion en Español por favor llame al (209) 456-8775.

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Section 3 | Title VI Complaint Procedures and Forms

Title VI Complaint Procedure and Form

The City of Manteca details its complaint procedures and provides Civil Rights Complaint forms in both English and Spanish. These documents are provided in Exhibits 3.1 through 3.4.

The Manteca Transit Title VI Complaint Form and program information are provided on the City of Manteca's transit website at:

<https://www.ci.manteca.ca.us/CommunityDevelopment/MantecaTransit/Pages/Manteca-Transit-Title-VI-Program.aspx>



City of Manteca
Public Works Dept.
Transit Division
220 Moffat Blvd.
Manteca, CA 95336
(209) 456-8888

Title VI Complaint Procedures

1. Any person who believes he or she has been discriminated against on the basis of race, color, or national origin by the City of Manteca in its operation of Manteca Transit (hereinafter referred to as "City") may file a Title VI complaint by completing and submitting the agency's Title VI Civil Right Complaint Form.
2. A complaint may also be filed by a representative on behalf of a person. Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative.
3. Complaints shall set forth as fully as possible the facts and circumstances surrounding the alleged discrimination. In the event that a person makes a verbal complaint of discrimination to an officer or employee of the City of Manteca or its transit contractor, the person shall be asked to complete the City's Complaint Form.
4. The Complaint Form is located on the Manteca Transit page of the City's website at www.mantecatransit.com or can be obtained by contacting the City of Manteca Transit at (209) 456-8888 or via e-mail at transitadmin@ci.manteca.ca.us. Instructions for submitting the completed complaint are included on the Complaint Form.
5. A person may also file a complaint directly with the Federal Transit Administration or at the following address:

Federal Transit Administration (FTA)
Office of Civil Rights
Attention: Title VI Program Coordinator
East Building -- 5th Floor TCR
1200 New Jersey Avenue SE
Washington, DC 20590

6. If a Title VI complaint is filed simultaneously with an external entity, any other Federal or State agencies or courts, the external complaint will supersede the City's complaint and the City's complaint procedures will be suspended pending the external entity's findings.
7. Civil rights complaints should be filed as soon as possible, but no more than 180 days after the alleged incident. The City will process complaints that are complete. In instances where additional information is needed for assessment or investigation of the complaint, the City will contact the complainant in writing within fifteen (15) working days. Failure of the complainant to provide the requested information within thirty (30) business days may result in the administrative closure of the complaint. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

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8. Once the complaint is received, it will be referred to the City of Manteca Director of Human Resources and Risk Management for review to determine if it has jurisdiction.
9. The City will respond within ten (10) working days with an acknowledgement letter informing the complainant whether their complaint will be investigated by the City's Director of Human Resources and Risk Management.
10. If the complaint will be investigated by the City's Risk Management and Human Resource Director, it must be completed within ninety (90) calendar days of receipt of the complaint. The Director of Human Resources and Risk Management will notify the complainant in writing of the final decision reached, including the disposition of the matter. One of two letters will be issued to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff person or other action will occur.
11. The complainant will also be advised of their right to appeal the decision to federal and state authorities as appropriate. If the complainant wishes to appeal the City's decision, they have ten (10) days after the date of the letter or the LOF to do so. The City's Transit Supervisor will also provide a copy of the City's decision and summary of findings to the Federal Transit Administration upon completion of the investigation.

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Exhibit 3.2 Title VI Complaint Form (English)



mantecatransit

City of Manteca Public Works Dept.
Transit Division
220 Moffat Blvd. Manteca, CA
95336
(209) 456-8888

Civil Rights Complaint

Title VI of the 1964 Civil Rights Act requires that "No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

If you believe you have received discriminatory treatment by Manteca Transit on the basis of your race, color, or national origin, you have the right to file a complaint with the City of Manteca. The complaint must be filed within 180 calendar days of the alleged discriminatory incident.

The information requested below is necessary to assist us in processing your complaint. Should you require any assistance in completing this form, please contact the City of Manteca.

Section I.

1. Name: _____
2. Full Address: _____
3. Telephone: _____ Cell Home Work
4. Email Address: _____
5. Accessible Format Requirements? Large Print Audio Tape TDD
Other: _____

Section II.

6. Are you filing this complaint on your own behalf? Yes No If Yes, go to **Section III**
7. If no, please provide the following information on the person for whom you are filing this complaint:
8. Name: _____ Relationship: _____
9. Full Address: _____
10. Please explain why you have filed for a third party: _____

11. Do you have permission of the third party to file on their behalf? Yes No

Section III.

12. Which of the following best describes the reason you believe the discrimination took place? (Check all that apply): Race Color National Origin
13. Date of alleged discrimination (Month, Day, Year): _____

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14. Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who alleged discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, attach an additional sheet to this form.

Section IV.

15. Have you ever filed a Civil Rights complaint with the City of Manteca in the past? Yes No

Section V.

16. Have you filed this complaint with any other Federal, State, or local agency? Yes No
If Yes, check all that apply and provide name of agency:

<input type="checkbox"/> Federal Agency: _____	<input type="checkbox"/> Federal Court: _____
<input type="checkbox"/> Local Agency: _____	<input type="checkbox"/> State Court: _____
<input type="checkbox"/> State Agency: _____	

17. Please provide information about a contact person at the agency/court where the complaint was filed:

18. Contact Name: _____ Title: _____

19. Full Address: _____ Telephone: _____

Section VI.

20. Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

Signature Date

Please submit this form in person or by mail to the address below:

City of Manteca Public Works Department, Transit Division
Attn: Civil Rights Complaint
220 Moffat Boulevard
Manteca, CA 95336

If you have any questions or need assistance filling out this form, please contact
City of Manteca at (209) 456-8888 or transitadmin@ci.manteca.ca.us.
The City will respond within 10 days of the alleged discrimination once the City receives this form.



City of Manteca
Public Works Dept.
Transit Division
220 Moffat Blvd.
Manteca, CA 95336
(209) 456-8888

Procedimientos de quejas del Título VI

1. Toda persona que crea que ha sido discriminada por motivos de raza, color, u origen nacional por la Ciudad de Manteca en su operación de Manteca Transit (en lo sucesivo, "Ciudad") puede presentar una queja de Título VI completando y presentando el Formulario de Queja de Derechos Civiles del Título VI de la agencia.
2. Un representante también puede presentar una queja en nombre de una persona. Quejas deberá ser por escrito y deberá ser firmado por el denunciante y / o el denunciante representante.
3. Las quejas expondrán de la forma más completa posible los hechos y circunstancias que rodean la supuesta discriminación. En el caso de que una persona presente una queja verbal dediscriminación a un funcionario o empleado de la ciudad de Manteca o su tránsito contratista, se le pedirá a la persona que complete el Formulario de queja de la ciudad.
4. El Formulario de queja se encuentra en la página de Manteca Transit del sitio web de la Ciudad en www.mantecatransit.com o puede obtenerse comunicándose con la Ciudad de Manteca Tránsito al (209) 456-8888 o por correo electrónico a transitadmin@ci.manteca.ca.us . Las instrucciones para enviar la queja completa se incluyen en la Queja.
5. Una persona también puede presentar una queja directamente ante la Administración Federal de Tránsito o A la siguiente dirección:

Administración Federal de Tránsito (FTA)
Oficina de Derechos Civiles
Atención: Coordinador del programa Título VI
Edificio Este - 5to piso TCR
1200 New Jersey Avenue SE
Washington, DC 20590

6. Si una queja del Título VI se presenta simultáneamente con una entidad externa, cualquier otra Agencias o tribunales federales o estatales, la queja externa sustituirá a la de la Ciudad. quejas y los procedimientos de quejas de la Ciudad se suspenderán en espera de la hallazgos de la entidad.
7. Las quejas de derechos civiles deben presentarse lo antes posible, pero no más de 180 días. después del presunto incidente. La Ciudad procesará las quejas que estén completas. En

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casos en los que se necesita información adicional para la evaluación o investigación del denuncia, la Ciudad se comunicará con el denunciante por escrito dentro de los quince (15) días. Si el denunciante no proporciona la información solicitada dentro de los treinta (30) días hábiles pueden resultar en el cierre administrativo de la queja. Un caso puede ser administrativamente cerrada también si el demandante ya no desea continuar con su caso.

8. Una vez recibida la denuncia, se remitirá al Director de Servicios Humanos de la Ciudad de Manteca. Recursos y gestión de riesgos para su revisión para determinar si tiene jurisdicción.
9. La Ciudad responderá dentro de los diez (10) días hábiles con una carta de reconocimiento. Informar al denunciante si su denuncia será investigada por el Departamento de Director de Recursos Humanos y Gestión de Riesgos.
10. Si la queja será investigada por el Departamento de Gestión de Riesgos y Director de Recursos, debe completarse dentro de los noventa (90) días calendario posteriores a la recepción de la queja. El Director de Recursos Humanos y Gestión de Riesgos notificará al demandante por escrito de la decisión final alcanzada, incluida la disposición del importar. Se enviará una de dos cartas al denunciante: una carta de cierre o una carta de encontrar (LOF). Una carta de cierre resume las acusaciones y afirma que hubo no es una violación del Título VI y que el caso se cerrará. Una LOF resume el acusaciones y entrevistas sobre el presunto incidente, y explica si alguna Se producirá una acción disciplinaria, capacitación adicional del miembro del personal u otra acción.
11. El denunciante también será informado de su derecho a apelar la decisión ante las autoridades federales y autoridades estatales según corresponda. Si el demandante desea apelar la ley de la Ciudad decisión, tienen diez (10) días después de la fecha de la carta o la LOF para hacerlo. La El supervisor de tránsito de la ciudad también proporcionará una copia de la decisión y el resumen de la ciudad de los hallazgos a la Administración Federal de Tránsito al finalizar la investigación



City of Manteca Public Works Dept.
Transit Division
220 Moffat Blvd. Manteca, CA
95336
(209) 456-8888

Denuncia de derechos civiles

La Ciudad de Manteca opera sus programas y servicios sin distinción de raza, color y origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles de 1964. Cualquier persona que crea que ha sido perjudicada por alguna práctica discriminatoria ilegal bajo el Título VI debe presentar una queja dentro de los 180 días de la supuesta ocurrencia a cualquiera de los siguientes por correo, en persona, fax y / o correo electrónico como se explica al final del formulario.

Sección I.

1. Nombre: _____
2. Dirección: _____
3. Teléfono: _____ Célula Casa Trabajo
4. Dirección de correo electrónico: _____
5. Requisitos de formato accesible? Impresión grande Cinta de audio TDD
Otro: _____

Sección II.

6. Está presentando esta queja en su propio nombre? Si* No * Si respondió "sí" a esta pregunta, vaya a la **Sección III.**
7. De lo contrario, proporcione el nombre y la relación de la persona por la que se queja:
8. Nombre: _____ relación: _____
9. Dirección: _____
10. Explique por qué ha solicitado un tercero: _____

11. Confirme que ha obtenido el permiso de la parte perjudicada si está presentando una demanda en nombre de un tercero? Si No

Sección III.

12. Creo que la discriminación que experimenté se basó en (marque todo lo que corresponda):
Raza Color Origen nacional Discapacidad Edad Sexo
13. Fecha de presunta discriminación (mes, día, año): _____

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14. Explique con la mayor claridad posible qué sucedió y por qué cree que fue discriminado. Describe a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona (s) que lo discriminó (si lo conoce), así como los nombres y la información de contacto de los testigos. Si necesita más espacio, utilice la parte de atrás de este formulario.

Sección IV.

15. Ha presentado anteriormente una queja por discriminación con esta agencia? Si No

Sección V.

16. Ha presentado alguna queja ante otra agencia federal, estatal, o local con respecto este incidente?:

Agencia Federal: _____ Tribunal Federal: _____
 Agencia Local: _____ Tribunal State: _____
 Agencia State: _____

17. Proporcione información sobre una persona de contacto en la agencia / tribunal donde se presentó la queja:

18. Nombre: _____ Título: _____

19. Dirección: _____ Teléfono _____

Sección VI.

20. Puede adjuntar cualquier material escrito u otra información que considere relevante para su reclamo. Su firma y fecha son requeridas a continuación.

Firma Fetcha

Envíe por correo, fax, correo electrónico o entregue el formulario completo a:

City of Manteca Public Works Department, Transit Division
Attn: Civil Rights Complaint
220 Moffat Boulevard
Manteca, CA 95336

Si tiene alguna pregunta o necesita ayuda en llenar la solicitud, favor de ponerse en contacto con City of Manteca at (209) 456-8775 or transitadmin@ci.manteca.ca.us. La Ciudad responderá dentro de los 10 días de la supuesta discriminación una vez que la Ciudad reciba este formulario.

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Internal Complaint Procedures

When a civil rights complaint (including a Title VI complaint) is received by the City of Manteca, it is processed in the following manner.

Verification

Civil rights complaints should be filed as soon as possible, but must be received no more than 180 days after the alleged incident. The City will only process complaints that are complete and signed by the complainant or their representative.

Follow-Up

In instances where additional information is needed for assessment or investigation of the complaint, the City will contact the complainant in writing within fifteen (15) working days of receipt of the complaint. Failure of the complainant to provide the requested information within thirty (30) business days may result in the administrative closure of the complaint. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

Review

Once all information regarding the complaint is received, it will be referred to the City of Manteca Director of Human Resources and Risk Management for review to determine if the City has jurisdiction. The City will respond within ten (10) working days with an acknowledgement letter informing the complainant whether their complaint will be investigated by the City's Director of Human Resources and Risk Management.

Investigation

If the complaint will be investigated by the City's Risk Management and Human Resource Director, such investigation must be completed within ninety (90) calendar days of receipt of the complaint.

Decision

The Director of Human Resources and Risk Management will notify the complainant in writing of the final decision reached, including the disposition of the matter. One of two letters will be issued to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident and explains whether any disciplinary action, additional training of the staff person, or other action will occur.

Appeal

The complainant will also be advised of their right to appeal the decision to federal and state authorities as appropriate. If the complainant wishes to appeal the City's decision, they have ten (10) days after the date of the letter or the LOF to do so. The City's Transit Supervisor will also provide a copy of the City's decision and summary of findings to the Federal Transit Administration upon completion of the investigation.

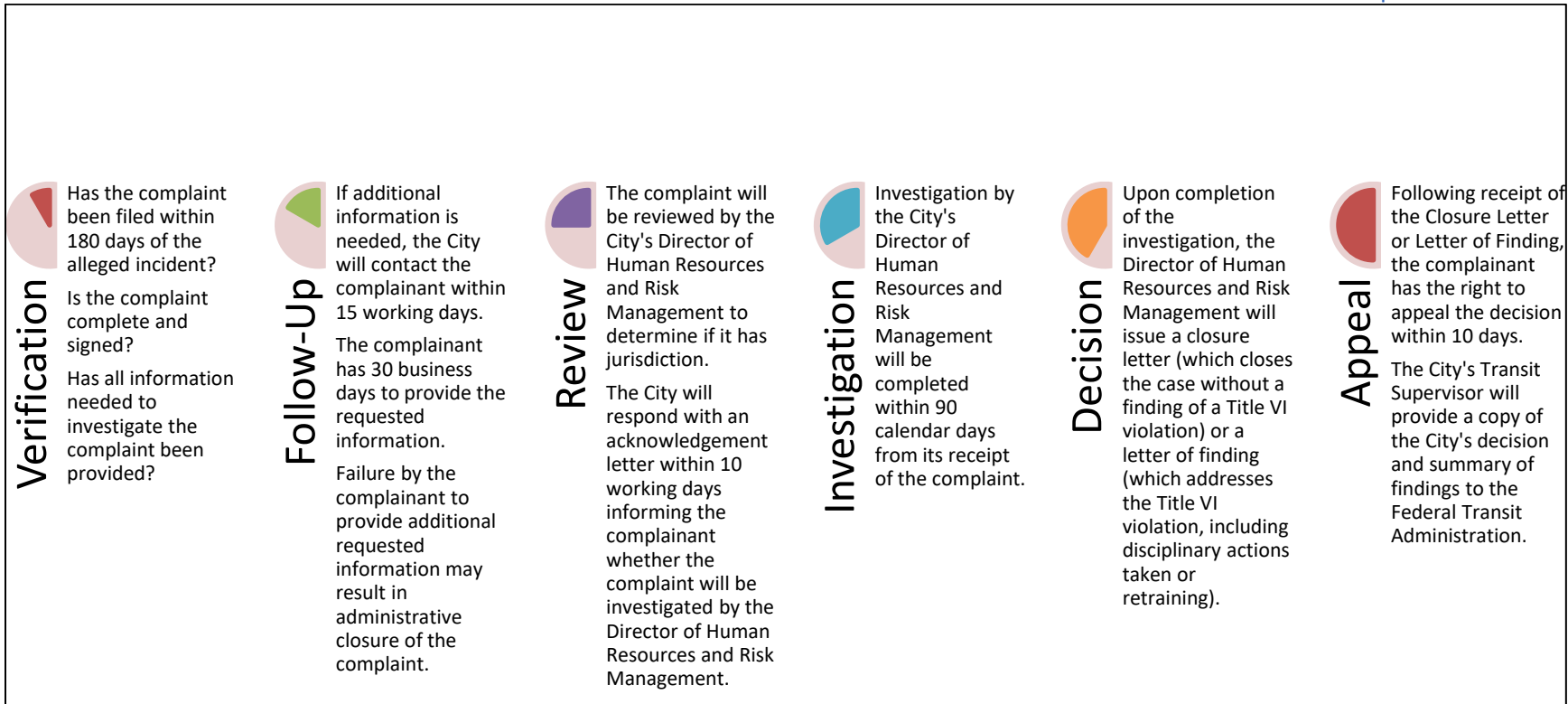
Note: If a Title VI complaint is filed simultaneously with an external entity, any other Federal or State agencies or courts, the external complaint will supersede the City's complaint and the City's complaint procedures will be suspended pending the external entity's findings.

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Exhibit 3.5 Internal Complaint Procedure



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Section 4 | List of Transit-Related Title VI Investigations, Complaints, and Lawsuits

As a recipient of Federal funds, the City of Manteca is required to prepare and maintain a list of investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, and/or national origin in transit-related activities and programs and that pertain to the entity submitting the report, not necessarily the larger agency or department of which the entity is a part. In accordance with FTA Title VI Regulations, this list must include details regarding:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the City of Manteca.

The City of Manteca has not been involved in any transit-related Title VI investigations, complaints or lawsuits during the period covered by the prior Title VI Program (FY 2019 – FY 2021). The City’s Transit Supervisor will continue to maintain a list of any Title VI investigations, complaints, and lawsuits and include a summary and description of actions taken by the City, as required by the Title VI regulations. The list will include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegations(s); the status of the investigation; lawsuit, or complaint; and actions taken in response, or final findings related to the investigation, lawsuit, or complaint. The list (shown in Exhibit 4.1) will be included in the City’s Title VI submittal every three years.

Exhibit 4.1 Title VI Investigations, Lawsuits, and Complaints Summary Table

Record of Title VI Complaints, Investigations and Lawsuits				
	Date	Summary	Status	Actions Taken
Investigations				
1.		None		
2.				
3.				
Lawsuits				
1.		None		
2.				
3.				
Complaints				
1.		None		
2.				
3.				

Section 5 | Public Participation Plan

Introduction

Located in California's Central Valley, Manteca is an attractive city of 84,800 persons (2020 California Department of Finance population estimates) in a productive area of San Joaquin County. The city, which comprises 20.57 square miles, is surrounded on all sides by scenic agricultural land and open spaces.

Manteca continues to foster its goal of maintaining a vibrant and diversified community. The City's mission statement is exemplified through its aggressive policies adopted to preserve a family atmosphere and high quality of life.

Manteca boasts a low crime rate, an award-winning school district, quality residential homes, and a quaint downtown.

Manteca is geographically located on State Route 120 between the San Francisco Bay Area and the historic Mother Lode leading to Yosemite National Park. It is 25 minutes from Stockton and Modesto; Manteca offers a central location with direct access to all modes of transportation. As part of the transportation planning process, citizen input on the work, projects, and products proposed and created by the City is desired and requested.

Manteca Transit is operated under contract with National Express Transit Corporation. The present services include a local dial-a-ride service within the City limits and four fixed routes that operate within the City limits. The Dial-A-Ride service and three of the four fixed routes operate Monday through Saturday; the fourth fixed route operates on weekdays only. The City also operates a peak-hour shuttle between the Manteca Transit Center and the Lathrop/Manteca ACE Station.

The City recognizes the importance and necessity of the public participation process. The Manteca City Council sets the overall policy for the transit system. There are five City Council members. The City Council meets on the first and third Tuesday of each month at 7:00 p.m. at Manteca City Hall.

All meetings of the Manteca City Council are open to the public. Members of the public may request time on the agenda of the Manteca City Council to comment on specific subjects of interest to the councilmembers. A minimum of three weeks advance notice should be given for requested agenda time. Additional subcommittees and working groups may be appointed at any time by the Mayor to address specific transportation-related topics or areas of interest to the City.

Goals and Objectives

The public participation process required by 23 CFR 450 should “provide complete information, timely public notice, full public access to key decisions, and support early and continuing participation of the public in developing plans and Transportation Improvement Programs....”

The City is committed to the availability of timely, complete information; to the notification of and public access to the decision-making process; and to ongoing public participation throughout the transportation planning process including, but not limited to, the development of the Short Range Transit Plan; the Transportation Improvement Program; review of transit services, fares, and operating parameters;

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Federal Transit Administration civil rights issues such as Title VI, Disadvantaged Business Enterprise (DBE), Equal Opportunity Program (EEO), and Americans With Disabilities Act (ADA); Unmet Transit Needs process; and the Public Participation process. Through this Public Participation Process, the City aims to identify methods for obtaining public input for and encouraging public participation in the transportation planning process.

The City's Public Participation Plan is based on the following principles:

- **Flexibility.** The engagement process will accommodate participation in a variety of ways and be adjusted as needed.
- **Inclusiveness.** The City will proactively reach out to and engage low-income, minority, and Limited English Proficient (LEP) populations.
- **Respect.** All feedback will be given careful and respectful consideration.
- **Proactive and Timeliness.** Participation methods will allow for early involvement and be ongoing.
- **Clear, Focused, and Understandable.** Participation methods will have a clear purpose and use for the input and will be described in language that is easy to understand.
- **Honest and Transparent.** Information provided will be accurate, trustworthy, and complete.
- **Responsiveness.** The City will respond and incorporate appropriate public comments into transportation decisions.
- **Accessibility.** Meetings will be held in locations which are fully accessible and welcoming to all area residents, including, but not limited to, low-income and minority members of the public and in locations relevant to the topics being presented and discussed.

Stakeholders and Public Groups

The City has identified the following groups and individuals as those having potential interest in public input and participation opportunities:

- Neighborhood organizations;
- Homeowner associations;
- Chamber of Commerce and other business groups;
- Groups representing travel modes (transit, bicycle, pedestrian, freight);
- Advocacy groups for disadvantaged and/or minority groups;
- Media (newspapers, television, radio);
- Governmental agencies;
- Educational Institutions (school districts, community colleges, private schools, State universities);
- Organizations or individuals who have been notified of public hearings for major projects, or organizations and individuals who have submitted written comments relating to public hearings for major projects, service changes and plans (these individuals and organizations would remain on the mailing list as long as the major project is under development).

Information Access

All planning and programming information for the City's transit system (Manteca Transit) is available for public review. The information can be viewed at the Manteca Transit Center, 220 Moffat Boulevard, Manteca, CA 95336. Additional information is posted online at www.mantecatransit.com.

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Outreach Techniques

Information about all City meetings is added to the existing Public Meeting Calendar that is produced weekly and distributed to local newspapers (*Manteca Bulletin*, *Modesto Bee*, *The Record*) as well as local radio stations in Modesto and Manteca and placed on the City's website. In addition, the agenda for the meetings is posted at Manteca City Hall, in the Manteca Transit Center, and on the City's website, www.ci.manteca.ca.us, a minimum of seventy-two (72) hours prior to the meetings.

Meeting information, when needed, is included on the website and City social media sites. Regular meetings, as well as special activities related to transit planning, Title VI, and project development are included. Press releases to area newspapers, television stations, and radio stations are used to notify citizens of upcoming activities of the City.

The City maintains an active participation in the local government access cable channel. Programs describing the activities of the City are included in the programming.

The City's transit website, www.mantecatransit.com, is used to provide information about transportation-related activities including information about the development of the Short-Range Transit Plan, the Transportation Improvement Program, Unmet Transit Needs Hearing, and Federal Transit Administration civil rights documents such as Title VI and others. The City's representatives are listed along with contact information.

Formal notices for public input meetings are published in the *Manteca Bulletin*.

The City posts transit schedules and rider information on its website in English and Spanish. The City also provides easy access to bilingual (English and Spanish) administrative staff and bus operators during operating hours to answer questions for Manteca Transit LEP customers.

Action Items for Use of Public Participation Plan

The City will use its public participation plan when considering fare changes, modifications to routes and schedules, and other transit planning projects when:

- A fare increase or significant change in the method of fare payment is being considered;
- A new route is established;
- An existing route is proposed for elimination;
- Considering the total discontinuance of service on any line or group of lines on any given day when service is currently offered;
- Any system-wide change in service hours that exceeds (plus or minus) 10 percent of current total service hours;
- Recommending changes to routing on any given route that affects more than 25 percent of the riders using the affected route;
- Schedules are changed on any given route that reduce the total number of one-way bus trips by more than 25 percent of the current number of bus trips; and
- Developing the FTA Program of Projects in conjunction with SJCOG for projects that benefit the Manteca Urbanized Area, including City projects.

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For minor schedule and service changes, the City will post service change notices 30 days in advance on the City's website, on buses, at bus stops, and at the Manteca Transit Center.

Public Meetings

The City reaches out to the community directly through meetings with agency and community staff and their clients, as needed. Information regarding the City's transit services is disseminated at these meetings. Information is also made available at various locations throughout the community, including Manteca City Hall, Manteca Library, Community Centers, Manteca Transit Center, on buses, and on the City's website at www.mantecatransit.com.

The City Transit Supervisor participates in monthly meetings with the San Joaquin Council of Governments (SJCOG) Interagency Transit Committee, Social Services Transportation Advisory Committee (SSTAC), and Technical Advisory Committee to discuss transit planning activities and coordination. The City Manager participates in the Transit Ad hoc Committee as part of the SJCOG Management and Finance Committee.

When transit issues are discussed, the City schedules transit workshops to invite the public to provide feedback on transit-related issues and also uses the City Council, which sets the policy for the transit system, as an opportunity to gather public feedback before acting on a decision.

The City Transit Supervisor also participates in the development of SJCOG's Public Involvement Plan and the San Joaquin County Coordinated Public Transit and Human Services Transportation Plan. The plan was last updated by San Joaquin Regional Transit District (RTD) in 2012. When the plan was developed, meetings were conducted countywide with participants from throughout the county. Recommendations to maximize community involvement are reflected in these plans and adopted by RTD.

General Awareness Surveys

The City from time to time conducts on-board rider and general awareness surveys in conjunction with various service planning-related projects. These personal one-on-one surveys allow customers to convey any concerns or comments they have regarding Manteca Transit services. The most recent fixed-route and Dial-A-Ride customer surveys were conducted in February 2019 in conjunction with the most recent Short Range Transit Plan.

Bilingual Outreach

Manteca Transit provides Spanish-speaking customers with bilingual information on public transit services. Staff assistance is utilized in outreach programs and offered for programs and public meetings. In addition, if any transit-related information is needed in an alternative language, customers can contact the City's Transit Supervisor.

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Input Mechanisms

The City accepts input and comments from the public through a variety of channels:

- a. Online through the City's website at www.ci.manteca.ca.us and www.mantecatransit.com.
- b. By mail to 220 Moffat Boulevard, Manteca, CA 95336.
- c. By emailing transitadmin@ci.manteca.ca.us.
- d. By faxing a request or letter to 209.923.8998

Comment forms can also be obtained at www.mantecatransit.com, by calling 209.456.8775 to have one mailed, by emailing a request to transit@ci.manteca.ca.us, or by faxing a request to 209.923.8998.

The public may submit comments to individual Manteca City Council members or directly to the City Council itself. Comments on the City's transit services, plans, reports, and programs may also be made at public input meetings. The City ensures all public input meeting locations are accessible in accordance with the Americans with Disabilities Act (ADA).

Members of the public, or a representative of a group, with expressed comments on a particular topic may make a request to the Mayor an appointment to serve as a citizen representative on an appropriate subcommittee, if one is activated.

Interested members of the public are able to offer input to the committees during a public forum element of each agenda.

The City does consider and respond to all public input received during planning and program development processes. If significant written or oral comments are received on transit services, FTA civil rights programs, or plans, a summary, analysis, and report on the disposition of the comments is made a part of the conclusion of the public participation process.

Schedule

Notification and announcement of all upcoming public meetings are made approximately 30 days in advance of the scheduled meeting through the methods described in the Outreach Techniques section of this plan. Legal notice of a scheduled public input meeting is published in the Manteca *Bulletin* approximately seven (7) to 10 days prior to the meeting.

Public meetings may be scheduled regularly or may occur on an as-needed basis depending upon the specific subject matter such as the development of the Short Range Transit Plan; the Transportation Improvement Program; review of transit services, fares, and operating parameters; Unmet Transit Needs Hearings; and Federal Transit Administration civil rights issues such as Title VI, Disadvantaged Business Enterprise, Equal Opportunity Program and the Americans With Disabilities Act (ADA). Other public input meetings are held throughout the year, as necessary.

Updates and revisions to the City's Public Participation Plan require a 10-day public comment period. The City Council will approve this plan following the completion of the public comment period, if revisions are needed after the initial adoption of the plan.

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Evaluation

The City will review this Public Participation Plan periodically in order to monitor the effectiveness of the procedures outlined in this document. Following evaluation of the outputs and outcomes of the Public Participation Plan, the City may revise these methods to incorporate new and innovative ways to involve the public in the transportation decision-making process.

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Section 6 | Summary of Outreach Efforts

A summary of outreach activities taking place during FY 2019 – FY 2021 is provided in Exhibit 6.1. It should be noted that a significant portion of this time period was during the COVID-19 pandemic, which resulted in a broad stay-at-home order that precluded most in-person outreach activities.

Exhibit 6.1 Outreach Activities, FY 2019 – FY 2021

Event Name	Info	Date
Boys & Girls Club	Transit has a booth and bus at the Club. We provide education on the local transit system,	Attended two events at the Club
Crossroads Street Fair	Transit has a booth and bus at the fair. We provide education on the local transit system	March 2019
Summer Series	Transit has a booth and bus at the night fair. We provide education on the local transit system	Jun 26, 2019
Summer Series	Transit has a booth and bus at the night fair. We provide education on the local transit system.	Jul 18, 2019
Public Information Sessions	Updating City's Manteca Transit routing, Transit Center projects	Jul 24, 2019
Serra High School orientation	Seniors, Juniors, Sophomores	Aug 2, 2019
Serra High School orientation	Freshmen	Aug 7, 2019
Public Information Sessions	Updating City's Manteca Transit routing, Transit Center projects	Aug 15, 2019
East Union School	back to school night	Aug 21, 2019
Stuff the Bus	Get food for Second Harvest. Also educate residents on Manteca Transit.	Nov 1, 2019
Public Information Sessions	Updating City's Manteca Transit routing, Transit Center projects	Nov 3, 2019
Pumpkin Festival	Transit has a booth and bus at the fair. We provide education on the local transit system	October 2019
Stuff the Bus	Get food for Second Harvest. Also educate residents on Manteca Transit.	Nov 19, 2019

Section 7 | Language Assistance Plan and Four-Factor Analysis

Purpose of the Language Assistance Plan

This Limited English Proficiency (LEP) Plan has been prepared to address the City's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The Plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, Federal Transit Administration Circular 4702.1A dated May 13, 2007, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency*, indicates that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all State and local agencies which receive federal funds, including City departments receiving federal grant funds.

Service Overview

The City administers Manteca Transit services under a contract with National Express Transit Corporation for fixed-route and demand-response services. The Manteca City Council is the policy-making body for the transit system.

Manteca Transit services consist of four fixed routes, the ACE Shuttle, and the demand-response (Dial-A-Ride) service. Manteca Transit operates generally Monday through Friday from 6:00 a.m. to 7:00 p.m. and Saturday from 9:00 a.m. to 4:00 p.m.

The City has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by Manteca Transit. As defined by Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English.

Language Assistance Plan Goals

One of the overarching goals of the City of Manteca's Title VI Program is to ensure meaningful access for LEP customers to transit services, information, and materials through the development of a Language Assistance Plan and by regular evaluation of the developed methods and strategies.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, and how to notify LEP persons that assistance is available. The first step toward this is the development of a Four-Factor Analysis as outlined by the U.S. Department of Transportation (USDOT). The Four-Factor Analysis includes:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter Manteca Transit activities or services.
2. The frequency with which LEP persons come in contact with Manteca Transit activities or services.

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3. The nature and importance of programs, activities, or services provided by the Manteca Transit to the LEP population.
4. The resources available to Manteca Transit customers and overall cost to provide LEP assistance.

Following the Four-Factor Analysis, the Language Assistance Plan (LAP) includes methodologies for identifying LEP individuals, providing services, establishing policies, and monitoring the LAP, as well as an implementation plan.

Four-Factor Analysis

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.

Estimating the number or proportion of LEP individuals that may be encountered by Manteca Transit will help identify the populations covered by the USDOT's Safe Harbor Provision. This provision stipulates that if an LEP group speaking a non-English language constitutes five percent or 1,000 persons, whichever is less, of the total population of persons likely to be encountered by transit services, then the service provider must make the following materials and services available to speakers of that language:

- Documents critical for accessing recipient's services or benefits,
- Letters requiring response from customer,
- Materials informing customers of free language assistance,
- Complaint forms, and
- Notification of rights.

Service Area Demographics

The service area demographic analysis describes potential Title VI-protected populations residing within Manteca Transit's service area, including their approximate size and geographic distribution. Title VI-protected populations within the service area include LEP persons. Specific groups considered include:

1. **Potential LEP Language Groups**
 - Spanish
 - Other Indic Languages

The American Community Survey (ACS) provides information at various levels on multiple topics. For the purposes of this Title VI program, our assessment utilized the population estimates provided in the City of Manteca geographic boundaries.

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Exhibit 7.1 Racial Breakdown of Total Population of Service Area

Race or Ethnicity	Manteca		San Joaquin County		California	
	Estimate	Percent of Total	Estimate	Percent of Total	Estimate	Percent of Total
Race						
White	53,697	82.2%	419,288	97.3%	23,453,222	59.7%
Black or African American	3,808	5.8%	51,931	12.1%	2,274,108	5.8%
Asian	7,567	11.6%	115,531	26.8%	5,692,423	14.5%
Native Hawaiian/Pacific Islander	888	1.4%	4,565	1.1%	155,290	0.4%
American Indian/Alaska Native	660	1.0%	4,706	1.1%	303,998	0.8%
Some other race alone	5,849	9.0%	65,384	15.2%	5,481,792	14.0%
Two or more races	6,660	10.2%	81,198	18.8%	1,922,664	4.9%
Total	79,129	121.2%	742,603	172.3%	39,283,497	100.0%
Ethnicity						
Hispanic or Latino (of any race)	31,454	28.7%	307,463	41.1%	15,327,688	39.0%

American Community Survey 2015 - 2019 five-year estimates

The American Community Survey data presents language spoken at home for persons five years of age and older. ACS 2015 five-year estimates (the most recent data available at this level of detail) revealed 69.3 percent of the Manteca Transit service area residents spoke only English at home, while approximately 22.4 percent spoke Spanish, making it the most commonly spoken language other than English found within the service area. The next most cited language spoken at home was “other Indic languages”¹ with 2.7 percent.

While many residents of Manteca speak another language at home, many of them speak English “very well.” In fact, 18.3 percent of Manteca residents fall within this category. Given the large population of Spanish speakers, it is not surprising to find Spanish speakers who speak English less than “very well” comprise 8.8 percent of the total population. By contrast, “other Indic language” speakers who speak English less than “very well” comprise just 1.4 percent of the total population.

¹ Per the U.S. Census Bureau, the “other Indic languages” category includes languages such as Bengali, Kannada, Malayalam, Marathi, Nepali, Punjabi, Tamil, and Telugu. In 2016, the Census began collecting data separately for Bengali, Tamil, Punjabi, and Telugu, and broke out Malayalam and Kannada into a separate category for “other Dravidian languages.” Therefore, more specific data about speakers of Indic languages will be available in future Title VI demographic analyses.

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Exhibit 7.2 Languages Spoken at Home By Community

	Manteca		San Joaquin County		California	
	Estimate	Percent of Total	Estimate	Percent of Total	Estimate	Percent of Total
Total Population (age 5 and up)	66,628	100.0%	655,934	100.0%	35,909,688	100.0%
Total Speak only English	46,196	69.3%	389,265	59.3%	20,142,054	56.1%
Total Speak language other than English	20,432	30.7%	266,669	40.7%	15,767,634	43.9%
Total Speak English "very well"	12,203	18.3%	149,427	22.8%	30,456,010	84.8%
Total Speak English less than "very well"	8,229	12.4%	117,242	17.9%	6,620,218	18.4%
Speak English less than "very well" - breakdown						
Spanish or Spanish Creole	5,856	8.8%	76,265	11.6%	4,430,740	12.3%
Other Indic languages	949	1.4%	5,990	0.9%	80,630	0.2%
Tagalog	398	0.6%	7,804	1.2%	266,692	0.7%
Portuguese or Portuguese Creole	290	0.4%	1,218	0.2%	23,946	0.1%
Chinese	215	0.3%	2,034	0.3%	43,739	0.1%
Other Pacific Island languages	172	0.3%	4,614	0.7%	633,043	1.8%
Hindi	75	0.1%	4,568	0.7%	40,600	0.1%
Vietnamese	58	0.1%	3,628	0.6%	319,841	0.9%
Persian	53	0.1%	931	0.1%	32,462	0.1%
African languages	34	0.1%	897	0.1%	75,896	0.2%
Korean	32	0.0%	727	0.1%	65,444	0.2%
Arabic	29	0.04%	185	0.03%	22,522	0.1%
German	28	0.04%	1,038	0.2%	18,540	0.1%
Russian	12	0.02%	541	0.1%	215,449	0.6%
Laotian	10	0.02%	226	0.03%	13,419	0.04%
Other and unspecified languages	10	0.02%	299	0.05%	72,109	0.2%
Polish	8	0.01%	62	0.01%	4,810	0.01%

American Community Survey 2011 - 2015 five-year estimates (most recent data available)

Based on the Safe Harbor provision cited above, only Spanish falls into the category of 1,000 individuals or five percent of the population, whichever is less. Consequently, the City of Manteca is required to provide vital information and communications in Spanish. While the City is not required to provide these materials in other languages based on the Safe Harbor provision, it may elect to do so depending on how frequently LEP speakers of other languages come into contact with the transit program. This is assessed under Factor 2.

City of Manteca English Learner Data

In addition to census data collected via the American Community Survey (ACS), we also reviewed English Learner (EL) statistics for students within the Manteca Unified School District. Public schools within the California Department of Education (CDE) must report on their students who are English Learners – students whose native tongue is a language other than English – as well as which language is their mother tongue each year, which provides more current data than the ACS. This data is available online via CDE's DataQuest website, dq.cde.ca.gov/dataquest/.

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The City accessed the available EL data for the 2019/20 school year to complete its comprehensive assessment of the populations it provides service to, including what LEP populations exist and where these groups may be concentrated. Periodically reviewing this data will enable the City to monitor which non-English languages are growing in order to provide appropriate language assistance services.

The highest concentration of EL students within Manteca speak Spanish, followed distantly by Punjabi and Filipino/Tagalog. Given Punjabi is included within the US Census Bureau category of “other Indic languages,” this is consistent with the ACS, where Spanish, “other Indic languages,” and Tagalog are the top three responses. This helps to confirm the older data contained within the ACS is still accurate. Detailed counts and relative percentages are presented in Exhibit 7.3.

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Exhibit 7.3 School English Learner (EL) Population

Language	Grade Level													Total	Percent of Total
	K	1	2	3	4	5	6	7	8	9	10	11	12		
Spanish	352	395	369	367	360	362	355	337	281	223	220	194	192	4,007	78.58%
Punjabi	94	65	64	43	40	27	25	32	20	12	14	27	23	486	9.53%
Filipino (Pilipino or Tagalog)	16	13	11	10	7	12	10	10	13	8	20	4	11	145	2.84%
Arabic	4	9	5	10	8	9	5	4	4	8	3	6	1	76	1.49%
Hmong	3	2	5	3	5	4	7	3	3	3	2	0	1	32	0.63%
Hindi	4	7	5	11	5	4	2	0	2	3	4	1	2	50	0.98%
Khmer (Cambodian)	4	1	2	0	5	3	1	1	5	3	0	0	1	26	0.51%
Lao	0	1	1	1	0	0	1	1	2	0	1	1	1	10	0.20%
Vietnamese	5	2	3	5	4	7	3	5	2	4	1	4	2	47	0.92%
Farsi (Persian)	3	8	5	6	1	3	6	5	1	2	2	1	1	44	0.86%
Samoan	0	0	0	0	1	0	0	0	0	1	1	0	0	3	0.06%
Thai	0	0	0	0	0	0	0	0	0	1	1	1	0	3	0.06%
Pashto	2	2	4	3	5	3	1	1	5	0	2	5	0	33	0.65%
Gujarati	0	0	0	0	0	0	1	0	0	0	1	0	0	2	0.04%
Cantonese	1	0	0	0	2	0	1	0	1	0	1	0	0	6	0.12%
Albanian	0	1	0	1	0	0	0	0	0	0	0	0	0	2	0.04%
Ilocano	2	1	0	3	4	1	0	4	2	1	2	1	0	21	0.41%
Burmese	0	1	0	0	0	0	0	0	0	0	0	0	1	2	0.04%
Mandarin (Putonghua)	0	0	3	0	1	1	0	1	2	2	0	0	0	10	0.20%
Urdu	1	1	0	3	0	3	0	0	1	0	0	1	1	11	0.22%
Telugu	0	1	1	0	0	0	0	0	0	0	0	0	0	2	0.04%
Indonesian	1	0	0	0	0	0	0	0	0	0	0	0	0	1	0.02%
French	1	0	1	0	1	0	0	0	0	1	0	0	0	4	0.08%
Portuguese	3	1	0	0	2	0	0	1	1	1	1	0	1	11	0.22%
Tigrinya	0	0	0	0	1	0	0	0	0	0	0	0	0	1	0.02%
Turkish	0	0	0	0	0	0	0	0	1	0	0	1	0	2	0.04%
Tongan	0	0	0	0	0	0	0	2	0	2	0	0	0	4	0.08%
German	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0.02%
Korean	1	0	0	0	0	1	0	0	0	0	0	0	0	2	0.04%
Cebuano (Visayan)	0	1	0	0	0	0	0	0	0	0	0	0	0	1	0.02%
Japanese	1	0	0	0	0	0	0	0	0	0	0	0	0	1	0.02%
Assyrian	0	0	0	0	1	0	0	0	0	0	0	0	0	1	0.02%
Taiwanese	0	0	0	0	0	1	0	0	0	0	0	0	0	1	0.02%
Other non-English languages	8	5	7	3	6	7	2	2	2	2	2	0	5	51	1.00%
Total	506	517	486	469	459	448	420	409	348	277	278	248	243	5,099	100.00%

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Factor 2: The frequency with which LEP persons come into contact with the program.

In order to estimate how often LEP populations come into contact with the City's transit services, surveys were conducted of both riders and City staff.

Customer Survey

A survey of Manteca Transit customers was conducted in January and February 2019 as part of the City's Short Range Transit Plan. Fixed-route surveys were collected via an intercept methodology. Twenty-three valid responses were received (which was proportionate to the estimated 100 unique riders per day). The survey was provided in both English and Spanish.

All valid responses utilized the English survey instrument. Two Spanish surveys were received, but were invalidated given only two or three of the 29 questions were completed. Two English surveys were also rejected for the same reason.

The primary languages spoken by respondents at home were generally English (69.6 percent) or Spanish (17.4 percent). An additional 13 percent of respondents cited "other," which included one response each for Chinese, French, and Korean.

More than 61 percent of respondents indicated a minority race or ethnicity, either alone or combined with another race/ethnicity. The most frequently cited ethnicity was White (38.1 percent of respondents), followed by Hispanic/Latino (33.0 percent) and Asian/Pacific Islander and Black (14.3 percent each).

Dial-A-Ride customers were also surveyed during the same period. Fifteen surveys were distributed onboard Dial-A-Ride buses, but only seven valid responses were received. While the survey was available in English and Spanish, all responses were in English.

The primary languages spoken by respondents at home were generally English (71.4 percent) or Spanish (14.3 percent). An additional 14.3 percent of respondents cited "other," which included one response (Punjabi).

More than 57 percent of respondents indicated a minority race or ethnicity, either alone or combined with another race/ethnicity. The most frequently cited ethnicity was White (57.1 percent of respondents), followed by Asian/Pacific Islander (28.6 percent) and Hispanic/Latino and Black (14.3 percent each).

Staff Survey

City staff and drivers were also surveyed regarding their customer interactions. As drivers and customer service staff are typically on the "front lines" and most frequently come into contact with transit patrons, their observations and insights provide an informative picture of how many LEP persons use Manteca Transit.

Data from the nine completed City staff/driver surveys generally corroborate the findings described in the Service Area Demographics section. Specific highlights from the driver survey are detailed below.

- At least 44 percent of the City's transit staff speak Spanish. Of the nine individuals surveyed, four cited speaking Spanish.

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- All staff reported encountering Spanish-speaking customers. Twenty-two percent cited encountering Cambodian, Hindi, and Tagalog, while 11 percent each said Arabic and Chinese.
- Two-thirds of drivers said they encounter at least five unique individuals each week who do not speak English or who do not speak English very well, though only one cited encountering more than 10 such customers each week. The remaining one-third indicated encountering fewer than five LEP customers per week.
- Despite the regular frequency of contact with LEP individuals, all staff reported no or occasional issues. This is likely due to the number of bilingual Spanish individuals on staff. No one reported frequent issues.
- When asked what materials/services would be of most benefit to riders who do not speak English or do not speak English well, 56 percent of respondents said cell phone-based live-voice translation services such as Google Translate. Translation services through the call center or dispatch and translated service brochures or brochures in multiple languages were each cited by one-third of respondents. Two respondents indicated “I speak” cards or common phrase cards would be useful, while one said translated online materials. One-third of respondents said they did not feel any additional materials were needed.
- The most common topic impacted by a language barrier was routes and destinations, which was cited by eight of the nine respondents. The only other topic cited was what is allowed on the bus.

A copy of the staff survey instrument is provided in the Appendix.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people’s lives.

Transit services operated by the City of Manteca play a vital role in the lives of many residents of the service area. To better understand Manteca Transit’s role among LEP populations, 42 local stakeholders (comprised of social service agencies, senior centers, faith-based organizations, and educational institutions) were contacted regarding the nature of the populations they serve. These stakeholders were selected because they were deemed likely to act as representatives for, or come into frequent contact with, LEP populations in Manteca. Of the stakeholders contacted, nine completed a stakeholder survey (survey instrument is provided in the Appendix). Together, these stakeholders provided important insight into the City’s public transit service area’s key LEP groups. As representatives who serve as leaders for these communities, they are attuned to the needs and potential language barriers members of these communities may face when using Manteca Transit.

- All nine stakeholders indicated Spanish as one of the languages they encounter. Other languages cited were Arabic (3), Cambodian (3), Chinese (3), Hindi (4), Hmong (1), Persian (2), Portuguese (3), Punjabi (1), Tagalog (3), Vietnamese (2), and Native American languages (1).
- English and Spanish were the languages most frequently encountered.
- Stakeholders did not report any significant issues with language. While two stakeholders reported occasional communication issues due to a language barrier, the remaining seven cited rarely or never encountering such barriers.

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- Only two stakeholders indicated the populations they served use Manteca Transit. Of those, neither was aware of any barrier to using transit due to language.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

The City of Manteca currently provides resources to each LEP group while maintaining cost efficiency for taxpayers. Resources may include, but are not limited to:

1. Bilingual or multilingual staff members (the City's Transit Division currently has staff members who are fluent in Spanish).
2. Professional translation services (can be implemented quickly).
3. On-call translation services (Transit recently implemented a Language Line account).
4. Input by various community organizations that regularly interact with LEP populations (ongoing basis).
5. Printing services for vital documents, brochures, and other media. Essential documents such as Title VI forms, Dial-a-Ride applications, proposed service/fare changes, and certain scheduling information will be made available in the identified languages per the LEP analysis. The City will attempt to use universal symbols such as pictures, maps, and diagrams when feasible to streamline communication among all language groups.
6. Documents, brochures, and other media of less-essential importance shall be translated into the identified languages per the LEP analysis upon request.
7. Multilingual services and resources offered and utilized by other City departments (available upon request).

Conclusions

The Four-Factor Analysis showed a significant portion of the population within the Manteca Transit service area (more than 12 percent) speaks English less than very well. Spanish is the most commonly used language other than English, comprising 22.4 percent of the population. Spanish was determined to be the only language that fell within the Safe Harbor guidance.

The employee survey found Spanish to be the most frequently encountered language by the transit program, and two-thirds of employees said they encountered at least five unique LEP individuals each week. However, due to the availability of bilingual Spanish drivers and dispatchers, employees indicated only occasional issues with communication.

The stakeholder surveys also reinforced Spanish as the most frequently encountered language. While there are numerous other languages present in the service area, they are encountered infrequently and populations are relatively small.

While the City is not required under Title VI to provide documents and information in any language other than Spanish, there may still be some residents who do not use Manteca Transit's services due to a language barrier. Strategies to address this, as well as other recommendations, are identified within the Language Assistance Implementation Plan.

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Language Assistance Plan

Language measures currently used or planned to be used by the City of Manteca to address the needs of LEP persons include the following:

- Translating vital documents including the Civil Rights Notice, Title VI Complaint Form, and Title VI Complaint Procedures into the identified LEP languages;
- Translating marketing materials into Spanish;
- If needed, arranging for availability of oral translators depending on availability;
- Providing interactive meeting materials to engage LEP individuals in the planning process; and
- Posting notices in appropriate languages informing LEP persons of available transit services, routes, and amenities; as well as opportunities for LEP persons to provide input on transit-related projects.

The City will continue to seek ways to add notices to the City website to inform LEP populations of opportunities for input.

Online Resources

While the Title VI Program is posted on the City's website, the transit website contains very little content translated in Spanish. The City is working toward adding more Spanish transit information and/or a Google Translate widget to translate the page into Spanish (or other languages). The page does include a .pdf of the Rider's Guide which includes service information in Spanish.

Telephonic Interpretation Service

In order to eliminate barriers due to language, Transit recently established an account with the telephonic interpretation service Language Line. The telephonic interpretation service will allow for real-time assistance to customers who call into the customer service phone number. Initial contact is made with a Transit employee who then determines if language assistance is required. When an employee receives a call in another language, they ask what language, and can prompt the caller using the most frequently encountered languages if necessary. The City employee dials the service, enters the appropriate PIN or code, and can reach a live translator for over 200 languages. As it is an on-demand service, the City only pays for the minutes it actually uses.

In order for the telephonic interpretation service to effectively mitigate barriers due to language, use of the service must be effectively communicated to the general public. A media release may be used to notify the community at-large, while other information can be posted on the Manteca Transit website. This notification will be most effective if the phrase, "For information in [name of language], call (209) 456-8888" is translated into the languages most frequently encountered by Transit staff, cited by stakeholders and riders, and represented by LEP demographics. These include Spanish, Arabic, Cambodian, Chinese, Hindi, Punjabi, and Tagalog. This would be a one-time cost, or could be translated for free using Google Translate.

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Bilingual Staff

Some Manteca Transit customers have limited English literacy skills and are unable to read or write in English. Manteca Transit has bilingual dispatchers and drivers, as well as a bilingual Transit Supervisor, that can assist its native Spanish-speaking population with minor translation services. The Transit Supervisor also attends all Transit public meetings and provides Spanish interpretation when needed.

Staff Training

To ensure effective implementation of this plan, Manteca Transit will schedule training at orientations for new staff and relevant employees on an annual basis to review:

- Manteca Transit's Language Assistance Plan,
- Demographic data about the local LEP populations,
- Printed materials available to LEP individuals,
- Other resources available to assist LEP individuals,
- How to provide assistance to customers with Limited English Proficiency,
- Which staff members are key resources for various languages,
- How to use Language Line on-demand telephone interpretation,
- How and when to document interactions with LEP customers, and
- How to identify and respond to civil rights complaints.

Notice to LEP Persons about Available Language Assistance

Manteca Transit is working toward being able to notify LEP persons in their own language about the language assistance available to them without cost by using the following methods:

- Notices on the Manteca Transit webpage,
- Providing information at local events, and
- Including this information on service collateral (e.g., brochures).

Monitoring, Evaluating, and Updating Plan

The Language Assistance Plan has been updated as part of this Title VI Program Update. On an ongoing basis, monitoring activities may identify changes that should be made to the Language Assistance Plan. The following reoccurring reporting and evaluation measures will be used to update the Language Assistance Plan.

The City of Manteca will regularly assess the effectiveness of how it communicates with LEP individuals by:

- Including questions about language assistance and information needs on any customer or community surveys;
- Conversations with stakeholders, organizations, and entities which work with LEPs; and
- As-needed outreach with LEP groups.

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The City will monitor its language assistance efforts, including:

- Recording and reporting on customer service interactions with LEP individuals,
- Incorporating discussion of Title VI into staff meetings and training, and
- Updating the Language Assistance Plan based on feedback received.

Implementation Plan

The matrix below presents an Implementation Plan for ensuring the Language Assistance Plan is quickly and efficiently implemented.

Exhibit 7.4 LAP Implementation Plan

Goal	Task	Anticipated Completion
Assess LEP population in the Manteca Transit service area	Four Factor Analysis	May 2021
	Stakeholder Survey	May 2021
	Driver/Staff Survey	May 2021
	Customer Survey	February 2019
	Demographics Analysis	May 2021
Develop Language Assistance Procedures	Update website to include Spanish content	FY 2022
	Implement telephonic interpretation program (Language Line)	FY 2021
Staff Training	Train City transit staff regarding in-house language resources and materials available to LEP individuals	FY 2022
	Train City staff regarding use of Language Line telephone interpretation service	FY 2022
	Train City staff regarding how and when to document interactions with LEP customers	FY 2022
	Train City Staff how to respond to civil rights complaints	FY 2022
Notification of Title VI Rights and Materials	Post Title VI notices in specified public locations	Prior to May 2021
	Post Spanish complaint process and civil rights complaint form on website	FY 2022
Monitor and Update Language Assistance Plan	Regularly review ACS and census demographic data	FY 2024
	Incorporate discussion of Title VI into regular staff meetings and trainings	FY 2022; ongoing

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Section 8 | Minority Representation on Planning and Advisory Bodies

The FTA requires the City to describe efforts to encourage participation of minorities on non-elected committees, board, councils, or other bodies. The City must provide in its Title VI Program a table of transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the City of Manteca City Council, and must indicate the racial breakdown of the membership of such committees or councils.

The City of Manteca has not established any non-elected transit-related committees or councils.

Should a non-elected committee or council specific to transit be established in the future, a summary of the committee members identified by race and a description of efforts made to encourage the participation of minorities on said committee will be provided in this section utilizing the table below.

Exhibit 8.1 Non-Elected Committee Membership Table

Race/Ethnicity	Service Area Population (Percentage)	Commission (Percentage)
Caucasian	XXX%	XXX%
Hispanic/Latino	XXX%	XXX%
Black/African American	XXX%	XXX%
Asian	XXX%	XXX%
American Indian/Alaska Native	XXX%	XXX%
Native Hawaiian/Pacific Islander	XXX%	XXX%

Member participation and selection will be monitored by the City's Title VI Program Administrator.

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Section 9 | Subrecipient Monitoring and Schedule of Subrecipient Title VI Program Submissions

The City currently contracts its federally funded transit operations to National Express Transit. Third-party contractors are not required to develop their own Title VI Programs, but must comply with the Title VI Program of the recipient with which they are contracting. Therefore, it is up to the City of Manteca to monitor its operations contractor to ensure it remains in compliance with the City's Title VI Program.

Currently, the City monitors Title VI compliance by ensuring the Notice to the Public is displayed on all transit vehicles, reviewing monthly reports, performing quality control checks, and holding meetings with contractor management. If recommended by the FTA, the City will also ensure Appendix E of the Title VI Assurances (US DOT Order 1050.2A) is incorporated into contracts with its third-party contractor. This document identifies the civil rights legislation with which all contractors must remain compliant.

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Section 10 | Title VI Equity Analysis

Title VI regulations require the completion of an Equity Analysis whenever a recipient or subrecipient begins planning the location and construction of a new transit facility (not including bus shelters, transit stations, power substations, or other facilities already evaluated through NEPA).

The City of Manteca has not undertaken any construction projects for facilities at a new location within the past several years. Therefore, no Equity Analysis is required at this time.

If in the future the City of Manteca begins planning for the development and construction of a new transit facility, the City will conduct an equity analysis prior to the selection of a construction site inclusive of the Title VI requirements below:

- a. The City of Manteca shall complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. The City shall engage in outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis shall compare the equity impacts of various siting alternatives, and the analysis shall occur before the selection of the preferred site.
- b. When evaluating locations of facilities, the City shall give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis shall be done at the Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts.
- c. If the City determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, the City may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. The City shall show how both tests are met; it is important to understand that in order to make this showing, the City must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

The equity analysis shall be completed and submitted as part of the City of Manteca's next Title VI Program update.

Section 11 | System-wide Standards and Policies

The FTA requires all fixed-route transit providers to develop quantitative service standards and policies for their fixed-route service. Individual public transportation providers may set standards that best reflect their local environment. Since the City operates fixed-route bus service, system-wide standards and policies are discussed below.

Vehicle Load

Measure: Provides service levels to prevent overcrowding and standees.

The City’s transit fleet consists of eight cutaway vehicles. All are wheelchair accessible in compliance with the Americans with Disabilities Act and all are equipped with bike racks. Manteca Transit rarely turns customers away due to over-capacity.

The City system-wide goal is to have an average maximum load factor for fixed-route service not to exceed 1.0 (i.e., 19 passengers for 19 seats and no standees). The chart below identifies the make and model of the vehicles used to provide transit service and their maximum load factor. The 26-foot cutaways are regularly assigned to the fixed-route service, though one of the smaller vehicles may be used as a spare if needed.

Vehicle Type	Average Passenger Capacities				
	Vehicle Length	Seating Capacity	Standing Capacity*	Total	Maximum Load Factor
Champion LF270FP	26 ft	19	0	19	1.0
Champion LF270FP	24 ft	13	0	13	1.0
Champion LF270FP	23 ft	13	0	13	1.0

**For safety reasons, Manteca Transit does not allow standees on any of its vehicles.*

Vehicle Headway

Measure: Provides adequate service frequency based on the corridor of operation and ridership demand.

Manteca Transit operates three fixed routes, Monday through Friday from 6:00 a.m. to 7:00 p.m. and two fixed routes on Saturday from 9:00 a.m. to 4:00 p.m. Each route consists of a one-way loop of approximately 13 miles and 25 stops.

Manteca Transit’s vehicle headway is 60 minutes on all fixed routes and does not have peak and off-peak hours. Therefore, vehicle frequency per route during weekdays is one vehicle per hour on all routes.

Manteca Transit also operates a shuttle to the ACE station which is designed to connect with ACE rail service, Monday through Friday. Morning service consists of two trips operating 30 minutes apart, while afternoon service consists of three trips operating on a 60-minute frequency.

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On-time Performance

Measure: Provides accessible and reliable transit services to Manteca.

On-time performance is tracked manually in a daily log by the bus operators while on route. In addition, bus operators are required to call in to dispatch when running late. Below are the City of Manteca's on-time performance standards for fixed-route service.

On-Time Departures

It is the goal of the City that fixed-route buses shall depart no more than five (5) minutes late from any scheduled time point. In addition, Manteca Transit strives to ensure a minimum of 95 percent of all departures meet this criterion.

Operating Ahead of Schedule

No bus shall depart a designated time point prior to its scheduled departure time.

Missed Trips

Manteca Transit shall, at a minimum, complete 100 percent of all scheduled trips. Any fixed route trip operating 20 minutes or more behind the scheduled time shall be considered a "missed trip."

Service Availability

Measure: Provides accessible and reliable transit services to Manteca.

It is Manteca Transit's goal is to provide affordable, reliable, efficient and user-friendly transit service that effectively meets the local mobility needs of those who have limited mobility options and those who choose Manteca Transit for environmental or lifestyle reasons.

Transit service is provided to major destinations and activity centers within Manteca. This goal includes major employers, shopping centers, healthcare and educational facilities, and other large trip generators. The availability of routes is based on the ridership demand balanced with available resources.

Service Policies

Distribution of Transit Amenities

Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Fixed-route transit providers must set a policy to ensure equitable distribution of transit amenities across the system. This requirement applies after a transit provider has decided to fund an amenity. Transit amenities may include: seating (benches, seats at stops/stations); bus shelters; printed information (signs, system maps, schedules); and waste receptacles.

The City of Manteca determines equitable locations of all transit amenities placed throughout the City to serve the fixed-route system. There are currently 76 bus stop locations in the fixed-route system. Bus stop

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improvements will be given priority at locations that receive higher numbers of boardings and alightings and will be made throughout the City during implementation of each improvement cycle.

Vehicle Assignment

Vehicle assignment refers to the process by which transit vehicles are placed into service on routes throughout the transit provider's system. The eight cutaway vehicles within the Manteca Transit fleet are ramp-equipped, have bicycle racks, and have heat/air conditioning. There is very little difference within the fleet with respect to customer amenities or capacity. Three of the eight cutaways are designed for dial-a-ride service.

While it is possible the vehicles may be shared between modes, five are generally dedicated for fixed-route use. The five cutaways assigned to the fixed-route service are so assigned given they are larger vehicles (capacity of 19 passengers, versus 13 passengers for the vehicles assigned for dial-a-ride use). All vehicles are the same age and general condition. Assignment of fixed-route vehicles on individual routes is based primarily on accruing mileage equally across the fleet. Therefore, route assignments rotate equally among the five vehicles. At present, all of the vehicles have similar mileage as others assigned to the same mode.

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Section 12 | City Council Adoption of Title VI Program Update

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RESOLUTION R2021-114

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF MANTECA, STATE OF CALIFORNIA, APPROVING 2021 TITLE VI PROGRAM FOR COMPLIANCE WITH TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

WHEREAS, Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs, services, or activities receiving federal financial assistance; and

WHEREAS, any entity received federal financial assistance from the Federal Transit Administration must not discriminate based on race, color, or national origin; and

WHEREAS, since the City is receiving federal funding from Federal Transit administration, it is required to have a Title VI Program to implement Federal Title VI non-discrimination requirements; and

WHEREAS, the City Council has considered all information related to this matter, as presented at the public meetings of the City Council identified herein, including any supporting reports by City Staff, and any information provided during public meetings.

NOW, THEREFORE, BE IT RESOLVED, by the City Council of the City of Manteca, as follows:

1. The City Council hereby finds that the facts set forth in the recitals to this Resolution are true and correct, and establish the factual basis for the City Council's adoption of this Resolution.
2. The City Council approve the City of Manteca Transit's 2021 Title VI Program for compliance with Title VI of the Civil Rights Act of 1964.
3. This Resolution shall take effect immediately upon its adoption.

I HEREBY CERTIFY that the foregoing Resolution was duly adopted by the City Council of the City of Manteca at a public meeting of said City Council held on the 17th day of August, 2021, by the following vote:

AYES: Breitenbucher, Halford, Nuño, Singh, Cantu

NOES: None

ABSENT: None

ABSTAIN: None

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MAYOR: 
BENJAMIN J. CANTU
Mayor

ATTEST: 
CASSANDRA CANDINI-TILTON
City Clerk

Section 13 | Appendix



This survey is part of the City's commitment to providing quality public transit services. Its goal is to identify those languages most commonly spoken by Manteca Transit riders.

STAFF SURVEY

1. ALL: Please indicate the languages you speak other than English. (Check all that apply.)

- Arabic, Cambodian, Chinese, Hindi, Persian, Portuguese, Spanish, Tagalog, Vietnamese, Other

2. DRIVERS: In a typical week, how many unique customers board your vehicle that either do not speak English or do not speak English very well? Please count unique individuals only.

- None/Never, Less than 5, 5 to 10, More than 10

3. DRIVERS: Are persons with a limited ability to communicate in English boarding and/or alighting in specific areas within the Manteca Transit service area? If so, where?

Blank lines for text input

4. CUSTOMER SERVICE/DISPATCHERS: In a typical week, how many unique customers do you encounter that either do not speak English or do not speak English very well? Please count unique individuals only.

- None/Never, Less than 5, 5 to 10, More than 10

5. ALL: In terms of all Manteca Transit customers, please indicate the most common language(s) you encounter other than English. (Check all that apply.)

- Arabic, Cambodian, Chinese, Hindi, Persian, Portuguese, Spanish, Tagalog, Vietnamese, Other

6. ALL: How would you rate your ability to effectively communicate with Manteca Transit customers who do not speak English or do not speak English very well?

- No issue, Occasional issues, Frequent issues

7. ALL: What type of materials/services do you believe would be beneficial to you as well as Manteca Transit riders who do not speak English or do not speak English well?

- Cell phone-based live-voice translation services such as Google Translate, Translated service brochures or brochures in multiple languages, Translation services through call center/dispatch, Translated online materials, "I speak" cards or common phrase cards, Other, No additional materials/services are needed

8. ALL: Identify the most common topics that arise where language/communication barriers typically occur:

- How to use the service, Fares and how to pay, Routes and destinations, Where to get off or when destinations are reached, Other, I have not experienced language/communication barriers.

9. ALL: What is your role at Manteca Transit? (Check all that apply.)

- Bus Operator, Dispatcher, Supervisor/Manager, Customer Service Representative, Other

10. ALL: Please share your ideas/suggestions regarding how Manteca Transit could serve its customers more effectively.

Blank lines for text input

Thank you for your participation! Please return your completed survey form to Juan Portillo or email it to kathy@moore-associates.net by April 28, 2021.



This survey is part of the City's commitment to providing quality public transit services. Its goal is to help identify those languages most commonly used by persons that ride Manteca Transit, as well as any barriers due to limited proficiency in English.

STAKEHOLDER SURVEY

1. Organization Name:

2. Type of Organization:

- Social Service, Health services, Employment services, Education, Faith-based, Business/Industry, Government, Other

3. Your name, title, and contact information

Name _____

Title _____

Email _____

Phone _____

4. What languages other than English are spoken by persons associated with your organization (i.e., customers)?

- Arabic, Cambodian, Chinese, Hindi, Persian, Portuguese, Spanish, Tagalog, Vietnamese, Other

5. How often do you experience language barriers at your organization?

- Never, Rarely, Occasionally, Often

6. Do the individuals your organization serves typically ride Manteca Transit?

- Yes -> Continue to Question 7, No -> Skip to Question 9, I don't know -> Skip to Question 9

7. Approximately what percent of the persons you identified in Question 6 do you estimate to be non-native English speakers?

- Less than 25 percent, 26-50 percent, 51-75 percent, More than 75 percent

8. Are you aware of any instances where a language barrier prevented persons you identified in Question 6 from using Manteca Transit?

- Yes -> approximate number of instances in the last 12 months, No

Please briefly describe the instance(s) and the language(s) involved:

9. Does your organization provide translation services?

- No, Yes -> in which language(s), Arabic, Cambodian, Chinese, Hindi, Persian, Portuguese, Spanish, Tagalog, Vietnamese, Other

10. Of the languages listed below, use numerals (1, 2, 3, etc.) to rank them to reflect the frequency each is used by persons associated with your organization. (1 would be the most-used language, etc.) (Do not indicate a number if no one associated with your organization uses that language.)

English, Arabic, Cambodian, Chinese, Hindi, Persian, Portuguese, Spanish, Tagalog, Vietnamese, Other

11. Please share your ideas/suggestions regarding how Manteca Transit could serve your organization and the individuals it serves more effectively.

Thank you for your participation! Please return your completed survey form using the enclosed postage-paid envelope or return it via email to kathy@moore-associates.net by May 3, 2021.