

Resolution No. 2025-135 N.C.S. of the City of Petaluma, California

RESOLUTION ADOPTING THE 2025 TITLE VI PROGRAM TO PROHIBIT DISCRIMINATION IN FEDERALLY FUNDED PROGRAMS AND SERVICES ADMINISTERED BY THE SAFE STREETS AND MOBILITY DIVISION

WHEREAS, the federal government enacted the Title VI of the Civil Rights Act of 1964, as amended, to prevent discrimination on the grounds of race, color, sex, age, disability, or national origin and to ensure that individuals are not excluded from participation in, denied benefits of, or otherwise subjected to discrimination under any program or activity receiving federal financial assistance based on race, color, sex, age, disability, or national origin; and

WHEREAS, the City of Petaluma is committed to ensuring that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any Division of Safe Streets and Mobility program, service, or activity, including Petaluma Transit, regardless of the funding source; and

WHEREAS, the Division of Safe Streets and Mobility, including Petaluma Transit, is committed to ensuring non-discriminatory access to all its transit services, and compliance with Title VI is a vital part of ensuring equitable services to the community; and

WHEREAS, the Division of Safe Streets and Mobility, including Petaluma Transit, is committed to ensuring that its policies and programs are designed to ensure meaningful participation in and access to bicycle, pedestrian, street, and transit services for minority, low- income, and limited English-proficient populations; and

WHEREAS, in Fall 2024, Petaluma Transit submitted and the City Council adopted its federally-compliant Title VI Program; and

WHEREAS, Petaluma Transit has since been reorganized into the Division of Safe Streets and Mobility, now comprising of street operations, trails, bicycle and pedestrian access, and transit; and

WHEREAS, the Federal Transit Administration requires that grant recipients submit a Council approved Title VI Program every three years and the California Department of Transportation requires that grant recipients submit a Council approved Title VI Program annually; and

WHEREAS, the proposed action is exempt from the requirements of the California Environmental Quality Act (CEQA) in accordance with CEQA Guidelines Section 15378, in that the updating of the Title VI Program does not meet CEQA' s definition of a" project," because the action does not have the potential for resulting in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment, and because the action constitutes organizational or administrative activities of governments that will not result in direct or indirect physical changes in the environment.

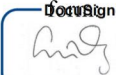
NOW, THEREFORE, BE IT RESOLVED, by the City Council of the City of Petaluma as follows:

1. Declares the above recitals to be true and correct and are incorporated herein as findings to this resolution.

- 2. The City Council of the City of Petaluma hereby approves and adopts the 2025 Title VI Program, attached hereto as Exhibit A, as required by the Federal Transit Administration (FTA) and California Department of Transportation (Caltrans) to ensure compliance with Title VI of the Civil Rights Act of 1964, as amended.
- 3. The City of Petaluma reaffirms its commitment to providing equitable and non-discriminatory access to transit services for all individuals, regardless of race, color, national origin, sex, age, disability, or limited English proficiency, and ensures that Safe Streets and Mobility services, including Petaluma Transit, are delivered in a fair and equitable manner.
- 4. The City finds that the adoption of the Safe Streets & Mobility Title VI Program is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Sections 15061 and 15378, in that the updating of a Title VI Program does not meet CEQA' s definition of a " project," because the action does not have the potential for resulting in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment, and because the action constitutes organizational or administrative activities of governments that will not result in direct or indirect physical changes in the environment.

Under the power and authority conferred upon this Council by the Charter of said City.

REFERENCE: I hereby certify the foregoing Resolution was introduced and adopted by the Council of the City of Petaluma at a Regular meeting on the 15th day of September 2025, by the following vote:

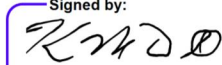
Approved as to
Signed by:

5EF85AE94F3048D...
City Attorney

AYES: McDonnell, Barnacle, DeCarli, Nau, Quint, Shribbs
NOES: None
ABSENT: Cader Thompson
ABSTAIN: None

DocuSigned by:

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ATTEST:
City Clerk

Signed by:

FE316449A062476...
Mayor

City of Petaluma – Safe Streets and Mobility

TITLE VI PROGRAM

August 2025

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1. INTRODUCTION

The Division of Safe Streets and Mobility (“Safe Streets & Mobility”) falls within the Public Works Department and is comprised of bicycle and pedestrian access, street operations and paving, access trails, and Petaluma Transit/Paratransit. This Title VI Program reflects the commitment of Safe Streets and Mobility towards ensuring that no person 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 it offers as protected by Title VI of the Civil Rights Act of 1964 (“Title VI”).

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, and national origin in programs and activities that receive federal financial assistance.

2. TITLE VI/NONDISCRIMINATION POLICY STATEMENT

The Safe Streets & Mobility Title VI/Nondiscrimination Statement reads as follows:

“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.”

Safe Streets & Mobility, including Petaluma Transit, is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin as protected by Title VI of the Civil Rights Act of 1964 amended (“Title VI”).

This policy applies to all protected classes under Title VI of the Civil Rights Act of 1964, which includes to, race, color and national origin. A copy of the Safe Streets & Mobility Nondiscrimination Policy can be found in Attachment A.

3. TITLE VI COORDINATOR

The Safe Streets & Mobility Title VI Coordinator is responsible for the overall Title VI program implementation, and performs the lead role in the development and implementation of the Title VI program and coordinating compliance across each branch within Safe Streets & Mobility. The Title VI Coordinator provides guidance and technical assistance on Title VI matters and has overall program responsibility for preparing reports and developing program procedures, which include:

- Overseeing Title VI program implementation
- Submitting a Title VI program and annual reports on the agency’s behalf
- Developing procedures for the prompt processing and disposition of complaints
- Processing complaints, compiling a complaint log, and reporting to Caltrans
- Developing procedures for the collection and analysis of statistical data
- Developing a program to conduct Title VI reviews of program areas
- Conducting annual Title VI assessments of pertinent program areas
- Developing Title VI information for dissemination

- Establishing procedures for resolving deficiency status and reducing to writing the remedial action agreed to be necessary

Designated Title VI Coordinator

Safe Streets & Mobility has a designated Title VI Coordinator. The Title VI Coordinator reports directly to the Deputy Director of Operations, who supervises the Division of Safe Streets and Mobility. The Deputy Director reports to the Director of Public Works. The Title VI Coordinator has direct contact with the Deputy Director and the Transit Manager.

Title VI Coordinator Contact Information

555 N. McDowell Blvd.
Petaluma CA 94954
707-778-4460

4. TITLE VI COMPLAINT PROCEDURES

Background

The City of Petaluma has a file established for all Title VI complaints. This file is stored digitally at the transit facility at 555 N. McDowell Blvd, Petaluma, California 94954. The file is available for review by anyone making such a request. The City of Petaluma will investigate all complaints. A record of the investigation will accompany a copy of the original complaint in the file. Additionally, any notification of legal action and the results of any legal action will be filed with the original complaint.

Procedure for the Public to Submit Title VI Complaints

If someone believes that they have been subjected to discrimination under Title VI while accessing bicycle or pedestrian facilities, street sidewalks and pavements, or Petaluma Transit, they may file a written complaint with Safe Streets & Mobility. The complaint must be filed **no later than 180 calendar days** from the alleged discriminatory incident.

The preferred method is to file the complaint in writing using the Title VI Complaint Form, in Attachment A, and submitting the form by email to transit@cityofpetaluma.org or mailing it to:

Title VI Coordinator
555 N. McDowell Blvd
Petaluma, CA 94954

Verbal complaints will also be accepted and transcribed by the Title VI Coordinator at (707) 778-4460. When calling, please request to speak with the Title VI Coordinator.

Complaints may also be filed directly with the Federal Transit Administration by filing a complaint with:

Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor –TCR
1200 New Jersey Ave. SE
Washington, DC 20590

Procedure to Receive Title VI Complaints

Upon receipt of a complaint regarding a violation of civil rights:

- The Title VI Coordinator will acknowledge receipt of the complaint in writing within 10 business days from the date received.
- All complaints will be handled confidentially to the extent permitted by applicable laws and regulations.
- A scanned copy must be saved in a folder labeled with the name of the filer and the date; this folder shall be filed in the Title VI folder.
- The original copy must be submitted to the City of Petaluma Administrative Services Department for review and initiate an investigation, as appropriate.
- Any additional correspondence from the filer should be handled in the same manner with a copy being filed with the copy of the claim in the title VI claim folder.
- Upon completion of the investigation, the complainant will be notified in writing of the determination, including an explanation of the decision and any applicable appeal process.
- All complaint records, including investigation files and correspondence, will be retained for a minimum of five (5) years and in accordance with the City's Record Retention Policy.
- The complainant also has the right to file a Title VI complaint directly with the Federal Transit Administration (FTA).

5. NOTICE TO PUBLIC OF RIGHTS UNDER TITLE VI

Safe Streets & Mobility displays the 'Public Notice' for public view at City Hall, customer counters at the Petaluma Transit facility, inside transit vehicles in English and Spanish, and on the Petaluma Transit website. The notice states that Safe Streets & Mobility is committed to complying with Title VI and to ensuring that no person be excluded from the participation in, be denied the benefits of or be otherwise subjected to discrimination under any programs, activities, or services.

A copy of the Public Notice is in Attachment A.

6. TITLE VI COMPLAINT LOG

The Title VI Coordinator will create and manage a log of all Title VI complaints identifying: complainant's name, factual allegations, alleged harm, basis for the discrimination complaint based on a protected class.

List of Title VI Investigations, Complaints, or Lawsuits in 2024

One Title VI complaint of bus driver discrimination was received by Petaluma Transit in March 2024. An agency investigation found no veracity of discrimination based upon the claim. There are no other investigations, complaints, or lawsuits currently filed with Safe Streets & Mobility, including Petaluma Transit.

7. PUBLIC PARTICIPATION PLAN

Safe Streets & Mobility has a public participation plan that is used to guide interaction with the community and encourage participation from traditionally disadvantaged populations, including the elderly, people with disabilities, minorities, and non-English speaking persons, and low income populations.

A copy of the Public Participation Plan is in Attachment B.

8. LIMITED ENGLISH PROFICIENCY PLAN

Safe Streets & Mobility ensures that persons with Limited English Proficiency (LEP) shall not be discriminated against nor denied meaningful access to and participation in the programs and services provided by the agency.

Attachment C contains an LEP plan that includes an assessment of current needs and language assistance strategies.

9. ASSURANCES

The Title VI Coordinator will ensure that Federally funded project documents contain the necessary Title VI Assurances and other language. All Federally funded projects will comply with Title VI of the Civil Rights Act of 1964 and all non-discrimination requirements.

Attachment D contains the DOT 1050.2A Title VI Assurances.

10. TRAINING

Safe Streets & Mobility will provide Title VI training to Safe Streets & Mobility staff with frequent public contact in the administration of federally funded programs, including Petaluma Transit drivers, dispatchers, and contracted staff. These trainings will occur at minimum every two years. The trainings will be conducted by the Title VI Coordinator.

In particular, the following items will be covered in trainings:

- Review of the Safe Streets & Mobility Title VI Program and other relevant documents
- Language assistance services
- How to handle potential complaints
- Where to seek assistance for Title VI questions and concerns

11. DATA COLLECTION

Demographic and related data collected and used by City staff comes from governmental sources responsible for collecting and vetting the information for consistency and accuracy. These sources include, but are not limited to, the U.S. Bureau of Labor Statics, U.S. Census Bureau, U.S. Bureau of Economic Analysis, California Department of Finance, California Department of Labor, and the California Employment Development Department.

Additionally, staff may also collect project-specific demographic data utilizing data collection as appropriate through the public outreach process on Federally-funded projects. Such outreach that may give staff the opportunity to collect demographic data may include door hangers, posters, emails, social media releases, press releases to local newspaper, public meetings, virtual meetings, and public comment through websites generated for projects.

12. ETHNIC BREAKDOWN OF TRANSIT ADVISORY COMMITTEE

Race & Ethnicity	Population	Transit Advisory Committee
White	66.9%	75%
Hispanic or Latino	19.3%	12.5%
Black or African American	1.4%	12.5%
Asian	4.8%	0%
American Indian and Alaska Native	1.2%	0%
Native Hawaiian and Other Pacific Islander	0.3%	0%
Two or More Races	7.98%	0%

13. SUBRECIPIENT MONITORING

The City of Petaluma has no FTA sub-recipients. Should there be any sub-recipients in the future, a formal review of the sub-recipient’s Title VI program will occur annually by the Title VI Coordinator. The Title VI Coordinator will also perform quarterly spot checks for documents and contracts and provide technical assistance as needed.

14. DETERMINATION OF SITE OR LOCATION OF FACILITIES

No new transit facilities were planned or built during the last term. There are no new transit facilities currently being designed.

15. SYSTEMWIDE SERVICE STANDARDS AND POLICIES

Petaluma Transit has adopted a Systemwide Service Standards and Policies for vehicle sizes, loads, and performance. A copy of Petaluma Transit’s Systemwide Service Standards and Policies is in Attachment E.

16. SERVICE AND FARE EQUITY ANALYSIS

Petaluma Transit does not operate fifty or more vehicles, and therefore is not required to complete a Service and Fare Equity Analysis per FTA Circular 4702.1B. As of July 1, 2024 Petaluma Transit does not charge fares for fixed route and paratransit service within the City of

Petaluma under a fare free pilot program. However, for major service changes, Petaluma Transit will conduct an equity analysis of proposed changes.

17. ANNUAL REVIEW AND PROGRAM UPDATE

The Title VI Program will be reviewed and updated annually by September 30 to ensure compliance with most recent circulars and guidance from both the FTA and Caltrans. The updated program will be submitted to Caltrans and the FTA by the Title VI Coordinator.

Attachment A: Public Notice

PUBLIC NOTICE

**TITLE VI OF THE 1964 CIVIL RIGHTS ACT
SAFE STREETS & MOBILITY NONDISCRIMINATION POLICY**

“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.”

Safe Streets & Mobility, including Petaluma Transit, is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin as protected by Title VI of the Civil Rights Act of 1964 amended (“Title VI”).

If you believe you have been subjected to discrimination under Title VI while accessing bicycle or pedestrian facilities, street sidewalks and pavements, or Petaluma Transit, you may file a written complaint with Safe Streets & Mobility. The complaint must be filed no later than 180 calendar days of the alleged discriminatory incident. If you'd like more information about the Title VI program, you may contact the Title VI staff at the address or phone number below.

The preferred method is to file your complaint in writing using the Title VI Complaint Form, available in hard copy, PDF format, or as an online form, and sending it to:

Title VI Coordinator
555 N. McDowell Blvd
Petaluma, CA 94954

Verbal complaints will also be accepted and transcribed by the Title VI Coordinator. To make a verbal complaint or receive more information on Petaluma Transit's Title VI Program, call (707) 778-4460 and request to speak with the Title VI Coordinator.

Complaints may also be filed directly with the Federal Transit Administration by filing a complaint with:

Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor –TCR
1200 New Jersey Ave. SE
Washington, DC 20590

If information is needed in another language, please call (707) 778-4460.
Si se necesita información en otro idioma, por favor llame al (707) 778-4460.

Safe Streets & Mobility & Petaluma Transit Title VI Complaint Process

Safe Streets & Mobility, including Petaluma Transit, grants all citizens equal access to all its mobility services. It is further the intent of Safe Streets & Mobility, including Petaluma Transit, that all citizens are aware of their rights to such access. This document is designed to serve as an educational tool for citizens to understand one of the civil rights laws that protect their benefit of Safe Streets & Mobility, including Petaluma Transit, programs and services, specifically, as it relates to Title VI of the Civil Rights Act of 1964.

What is Title VI?

Title VI is a section of the Civil Rights Act of 1964 requiring that “No person in the United States shall on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” Note that Title VI does not address gender discrimination. It only covers race, color, and national origin. Other Civil Rights laws prohibit gender discrimination.

Complaint Process

How do I file a complaint?

If you believe that you have received discriminatory treatment by Safe Streets & Mobility, including Petaluma Transit, on the basis of your race, color, or national origin, you have the right to file a complaint with the Title VI Coordinator. The complaint must be filed no later than 180 calendar days after the alleged discriminatory incident.

Methods of filing a complaint

The preferred method is to file your complaint in writing using the Title VI Complaint Form, available in hard copy, PDF format, an email with the form attached, or as an online form, and sending it to:

Title VI Coordinator
555 N. McDowell Blvd
Petaluma, CA 94954

Completed forms can be submitted via email to: transit@cityofpetaluma.org. Verbal complaints will also be accepted and transcribed by the Title VI Coordinator. To make a verbal complaint, call (707) 778-44260 and request to speak with the Title VI Coordinator.

You also have the right to file a complaint with an external entity such as the Department of Transportation (DOT), a federal or state agency, or a federal or state court.

Investigations

Within ten working days of receipt of the formal complaint, the Title VI Coordinator will notify the complainant and begin an investigation.

The investigation will address complaints against Safe Streets & Mobility, Petaluma Transit and Petaluma Paratransit employees and contractors. The investigation will be conducted in conjunction with and under the advice of the Administrative Services Department and City Attorney's Office.

The investigation may include discussion(s) of the complaint with all affected parties to determine the problem. The complainant may be represented by an attorney or other representative of his/her choosing and may present testimony and evidence in the investigation. At the end of the investigation, the complainant will receive a letter stating the final decision.

The complainant shall be notified of their right to appeal the decision. Appeals may be made to the DOT.

TITLE VI COMPLAINT FORM

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

Note: The following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form, please let us know.

Complete and return this form via email to: Transit@cityofpetaluma.org or via mail to:

Title VI Coordinator
555 N. McDowell Blvd
Petaluma, CA 94954

Complainant's Name _____

Address _____

City, State and Zip Code _____

Telephone Number (home) _____ (business) _____

Email _____

Person discriminated against (if someone other than the complainant)

Name _____

Address _____

City, State and Zip Code _____

Which of the following best describes the reason you believe the discrimination took place? Was it because of your:

Race _____ Color _____

National Origin _____

What date and time did the alleged discrimination take place?

In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.

Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court? _____ Yes _____ No

If yes, check all that apply:

_____ Federal agency _____ Federal court _____ State agency
_____ State court _____ Local agency

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

Name _____

Address _____

City, State, and Zip Code _____

Telephone Number _____ Email _____

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

Complainant's Signature

Date

Attachment B: Public Participation Plan

PUBLIC PARTICIPATION PLAN
City of Petaluma – Safe Streets & Mobility

Introduction

This Public Participation Plan is used to inform the community of available services and to encourage participation, especially from traditionally disadvantaged populations, including the elderly, people with disabilities, minorities, non-English speaking persons, and low-income populations. The Plan includes a summary profile of the City of Petaluma and a description of the public participation strategies undertaken by Safe Streets & Mobility, including Petaluma Transit.

Community Profile

The following summary of the City of Petaluma’s geography, social characteristics, and economic characteristics establishes a context for this Public Participation Plan. All social and economic characteristics are derived from the 2023 American Community Survey 5-year Estimates unless otherwise noted.

Geography

The City of Petaluma covers approximately 14.4 square miles of land. There are 24,842 housing units and 4,115 residents per square mile. California Highway 101 and Washington Street divide the City into quadrants. The Petaluma River runs through the historic downtown on the west side of the City. The east side of the City contains newer neighborhoods and retail centers. There are two Petaluma Transit Transfer Centers located on either side of Highway 101, the Copeland Street Transit Mall (west) and the Eastside Transit Center (east).

Social & Economic Characteristics¹

Population & Age

Age 0-17	19%
Age 18-65	60%
Age 65+	21%
Median Age	45
Total Population	59,321

Race & Ethnicity

White	66.9%
Hispanic or Latino	19.3%
Black or African American	1.4%
Asian	4.8%

¹ U.S Census Bureau. (2022). AMERICAN COMMUNITY SURVEY (ACS) 5-year estimates.

American Indian and Alaska Native	1.2%
Native Hawaiian and Other Pacific Islander	0.3%
Two or More Races	7.98%

Education – Population 25 Years and Older (44,264)

Less than High School Graduate	7.9%
High School Graduate (include equivalency)	16.3%
Some College or Associate’s Degree	33.2%
Bachelor’s Degree	27.4%
Graduate or Professional Degree	15.6%

Veteran Status

Civilian Veterans	5.7% ²
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Language

English Only	75.3%
Spanish	17.1%
Asian and Pacific Islander Languages	3.6%
Other Indo-European Languages	3.3%
Other Languages	0.6%
Speak English “Less Than Very Well”	7.6%

Economic Characteristics

Median Household Income	\$109,832
Living in Poverty	6.2%

Public Participation Accessibility Strategies

Safe Streets & Mobility, including Petaluma Transit, ensures equal access to its programs and services and promotes inclusivity undertaking the following:

- Public meetings that are held in the evenings and at a central, active transportation or transit-accessible location to allow for maximum attendance and at varying times throughout the day to accommodate different work schedules.
- Pedestrian and Bicycle Advisory Committee and Transit Advisory Committee meetings that are televised on the local Community Access station and available to view online live or via archive.
- Coordination and partnership with community organizations.
- Outreach to schools.
- Events at the Petaluma Senior Center.
- Events at senior housing facilities.
- Transit maps tailored to each of the four primary public middle and high schools are distributed in print and posted online in English and Spanish.

² From percentage of civilian population 18 years or older.

- Periodic focus groups that are conducted at the schools and junior college.
- Third-party translation services that are available in real-time for phone conversations during business hours (contracted service).
- Bilingual advertising on buses about opportunities to participate with Petaluma Transit.
- Email notices of opportunities to participate that are sent to the City's general mailing list.
- Paratransit application materials and forms that are available in English and Spanish
- Videos on how to ride the bus that are posted online.
- Rider guides for bus and paratransit that are provided in large print.
- Website content that is provided in multiple languages, including Spanish.
- Title VI Program that is provided on the website in English and Spanish.
- Social media, including Facebook, that is used to notify riders of changes or delays, upcoming road repairs, sidewalk or bike lane closures, community meetings, etc.

Public Participation Methods

Project Open Houses, Workshops, and Community Meetings

Publicly noticed project open houses and community meetings provide stakeholders with the most current information in an interactive setting. These may consist of brief presentations with brainstorming discussions, full project or service proposal reviews, or small informational sessions. Workshops solicit input from the community early in the planning phases of any potential change and at key decision points. Workshops may use exercises or breakout groups to generate ideas and feedback. Public forums provide the community with an opportunity to hold a community discussion on proposed and planned changes. Safe Streets & Mobility, including Petaluma Transit, compiles any comment cards, meeting notes, and written statements to document public input and present to the Pedestrian and Bicycle Advisory Committee and Transit Advisory Committee. Staff provide information to participants on upcoming public meetings, resources on the City of Petaluma website and the Petaluma Transit website, and how to contact the project manager. Safe Streets & Mobility, including Petaluma Transit, works with community partners to leverage already scheduled meetings in low-income, minority, and LEP communities to integrate public participation efforts into existing community and neighborhood activities. Comments are accepted in English and Spanish. Translators are made available at meetings when possible.

Public meetings that are held at various locations within the community are transit and Americans with Disabilities Act (ADA) accessible, and they may be scheduled at various times of the day and on Saturdays to accommodate working families, individuals, and seniors. Staff continue to work with community-based organizations and other partners when scheduling these events to meet the needs of particular communities. Convenient and accessible locations, facilities, and meeting times maximize opportunities to provide input.

Website Support

Safe Streets & Mobility, including Petaluma Transit, provides project updates and information on how to provide input on its websites, cityofpetaluma.org and transit.cityofpetaluma.net. The

general public may learn about the purpose of the projects, the communities it serves, project timeframes, and community engagement.

Petaluma Transit will dedicate web pages for service changes, with links to electronic files of printed materials, updating current material to reflect service changes, and calendars of upcoming participation events, public forums, and workshops. Links may also be provided in various organizations' newsletters. Information includes tables that list changes, new route maps, a travel planner, information regarding service changes on the pages of the affected routes, a rider alert at the top of the home page, and contact information to reach Petaluma Transit staff. Petaluma Transit's website provides access to detailed information on services and programs, service updates, its Short Range Transit Plan, ongoing activities, completed projects, and will have a link to the Transit Advisory Committee's agendas and packets. Petaluma Transit's website supports feedback and comments, interactive maps, trip planning, and real-time transit information. Web activities may include reaching out to Petaluma organizations and requests to have Petaluma Transit web page links on their websites. Google Translate allows visitors to instantly translate the website content into over a dozen languages, including Spanish.

Media Relations and Non-English Speaking Residents

Press Releases and media events disseminate information and accomplishments to local, national, and trade media outlets. Safe Streets & Mobility, including Petaluma Transit, uses various available resources, including media contact lists, websites, and social media, to communicate with the general public. The media strategy incorporates written press releases, interviews, events. These are tools that will be utilized where appropriate and as circumstances and resources allow.

Community Events

Safe Streets & Mobility, including Petaluma Transit, staff participate in community events throughout the City to establish a presence, promote programs, and interact with residents. Outreach includes information tables at public events, environmental forums, community open houses throughout the City, community health and wellness events, farmers markets, or low-income housing and job fairs. At these events, staff and community organization partners provide information services and programs, answer questions, assist with trip planning, and obtain input from the public.

Community Organizations

Safe Streets & Mobility, including Petaluma Transit, staff identifies and engages with individuals, institutions, community, and faith-based organizations with low-income, minority and/or LEP constituents to ensure they understand program and service proposals and listen and respond to their concerns. Safe Streets & Mobility, including Petaluma Transit, has established relationships with Petaluma People's Service Center, Petaluma's Family Resource Center, PEP Housing, and COTS among others, to organize and conduct outreach activities and community meetings to discuss services and programs.

Flexible Public Participation Opportunities

Safe Streets & Mobility, including Petaluma Transit, staff vary the size and format of meetings depending on the community's needs. A community meeting with the local members of the Board of Directors (City Council), for example, will differ in size and format from a gathering of a neighborhood group in the impacted area. Communications announcing public participation opportunities are tailored to reach a particular community or affected population.

Where appropriate, Safe Streets & Mobility, including Petaluma Transit, distributes surveys to solicit input from the public via the websites, mailed out, web-based, given out at bus stops and on-board buses, or administered by staff. Comment forms solicit input from the public in addition to or in place of conducting surveys. These forms can be distributed in various ways, including stocking them on buses, at transit centers, at community centers, and having them seat-dropped on vehicles. Staff may also distribute them in person at community events, on buses, and at bus stops. Signage in English and Spanish is located on all public vehicles with instructions on how to provide feedback to the Agency.

A phone line is provided for passengers to ask questions about proposed service changes or for scheduled service changes before and after those changes occur. Phone contact is also a method for obtaining feedback regarding service changes. Petaluma Transit coordinates with partners, community organizations, and stakeholders to make the phone number available to current and potential riders.

Translation Assistance

As appropriate, Safe Streets & Mobility, including Petaluma Transit, will host community meetings with translation assistance provided by bilingual Petaluma Transit staff, external translators, or community members. Comment cards are supplied, and staff follow-up on commentators' specific requests and complaints through investigation and additional discussions. In-person language assistance in Spanish is available at Petaluma Transit's offices or via telephone. Petaluma Transit provides bilingual phone support in English and Spanish (and 150+ additional language via real-time phone translation services – contracted service)

Multilingual Information Materials

Safe Streets & Mobility, including Petaluma Transit, develops and publishes schedules, information sheets, and brochures in Spanish and English in addition to public information materials on current and upcoming projects. Materials can include fact sheets, Frequently Asked Questions, and flyers. These may be updated based on feedback and questions from the general public. As appropriate, materials are translated and posted on transit.cityofpetaluma.net and disseminated at public events and distributed via postings inside transit vehicles, major transfer locations, and shelters. Information is also distributed by email blast to community outreach partners, stakeholders, and interested individuals. Depending on the document, the project scope, and the potential impact on LEP populations, materials may be translated into other languages as required Presentations and Visual Aids. Project staff will use various illustrative visual aids as appropriate and as circumstances allow to support effective communications with the public.

These may include drawings, charts, graphs, photos, maps, and how to access trip planning and real-time information on the internet. Staff often uses PowerPoint presentations at community meetings, which are translated as needed.

Street Level and On Board the Bus Outreach

Petaluma Transit riders and Petaluma City residents may have no interest or ability to participate in a meeting or review information on a website; therefore, street-level outreach attempts to capture the opinions and needs of these stakeholders. This includes staff and community outreach ambassadors engaging in conversations, providing information, and recording comments. For specific study areas, project staff may engage residents, businesses, and customers that live and conduct business along the route to inform, administering surveys, build support and address concerns or ideas. This includes getting on the agenda of local neighborhood meetings, which offers an additional opportunity to invite participation in ongoing outreach efforts. This form of outreach can be particularly effective for reaching those that are not likely to read printed material or use the Petaluma Transit website. The scale of in-person activities will be conducted based on the specific project or activity requirements, the availability of staff or community partners, or if there are significant service changes planned.

Social Media

Safe Streets & Mobility, including Petaluma Transit, will attempt to reach out to those who cannot attend or do not regularly participate in formal public meetings and board hearings. Through its annual outreach and marketing activities, the Agency is preparing to bolster its social media presence through Facebook and Twitter to encourage participation. For those who can participate in person, an online and social media presence provides two-way communication between meetings, strengthens the dialogue, and supports a transparent planning process.

Community Advisory Groups

Safe Streets & Mobility, including Petaluma Transit, develops project-based community advisory groups that provide input and feedback as a project or study is designed and implemented through consultation with stakeholders. Groups consist of stakeholders and members of various communities, organizations, backgrounds, and interests that provide input to the Agency on specific programs or projects. Safe Streets & Mobility, including Petaluma Transit, has benefited from working with community advisory groups in the development of transit needs assessments. The City strives to schedule group meetings during times and in locations that maximize stakeholder participation.

Public Notices and Legal Notices

In addition to information materials, Safe Streets & Mobility, including Petaluma Transit, staff may use other forms of public advertisement to notify the public of important project or service-related information on bus shelters, at bus stops, inside or outside transit vehicles, and other public locations as appropriate. Petaluma Transit will post rider information signage on its vehicles based on the needs of the outreach campaign and those affected. Signage is available in both English and Spanish.

Community-Based Organizations and Contractor Outreach for Disadvantaged Business Enterprises

Outreach to contractors and community-based organizations regarding Petaluma Transit's Disadvantaged Business Enterprise (DBE) programs provides information about opportunities to bid and compete for upcoming contracts. Petaluma Transit collaborates with DBE officers in transit agencies across the Bay Area as members of the Business Outreach Committee (BOC) to develop and stage four outreach and educational events each year. Events and workshops are in addition to the BOC's quarterly newsletter and announcements of upcoming contract opportunities. These outreach events inform the contracting community of upcoming bid packages, assist small contractors in developing relationships with prime contractors, and examine ways to increase diversity in workforce participation.

Email Communication

Project-specific email blasts facilitate communication and feedback from the public. Email blasts may be used to communicate with community-based organizations, stakeholders, advocacy groups, merchants' organizations, neighborhood groups, and other interested individuals. In addition, the City of Petaluma sends out email newsletter blasts to the community multiple times per week, which also include topical Transit information as needed.

Safe Streets & Mobility, including Petaluma Transit, also maintains a general email list consisting of those who have indicated they wish to be notified of general Petaluma Transit news and outreach activities. The public can notify Safe Streets & Mobility, including Petaluma Transit, of their interest via the cityofpetaluma.org or transit.cityofpetaluma.net Web sites, by phone, in person, by mail, and at meetings.

Board of Directors' Meetings (City Council Meetings)

Agendas are available at least 72 hours before the Board meetings. Board meetings that involve fare and service changes are advertised on a broader scale. Meeting times are communicated via bilingual notices posted in transit vehicles, shelters, and major transfer hubs. Radio ads and media placements in English and Spanish language newspapers are utilized to allow appropriate and as resources. All Petaluma meetings have a public comment period, and translators are available on 48-hour request. Meetings are held at Petaluma City Hall, which is accessible by transit.

Meetings are streamed on the internet and archived on the City's website <http://cityofpetaluma.net/cclerk/archives.html>. Board agendas, staff reports, and meetings minutes are also available at <http://cityofpetaluma.net/cclerk/archives.html>.

All meeting agendas include the following notice:

"In accordance with the Americans with Disabilities Act, if you require special assistance to participate in this meeting, please contact the City Clerk's Office at (707) 778-4360 (voice) or (707) 778-4480 (TDD). Translators, American Sign Language interpreters,

and/or assistive listening devices for individuals with hearing disabilities will be available upon request. A minimum of 48 hours is needed to ensure the availability of translation services. In consideration of those with multiple chemical sensitivities or other environmental illness, it is requested that you refrain from wearing scented products. The City Clerk hereby certifies that this agenda has been posted in accordance with the requirements of the Government Code.

In accordance with Government Code §54957.5, any materials of public record relating to an agenda item for a regular meeting of the Transit Advisory Committee that are provided to a majority of the members less than 72 hours before the meeting will be made available at the City Clerk's Office, 11 English Street, during normal business hours. Materials of public record that are distributed during the meeting shall be made available for public inspection at the meeting if prepared by the City or a member of its legislative/advisory body, or the next business day after the meeting if prepared by some other person. For accessible meeting information, please call (707) 778-4360 or TDD (707) 778-4480. Agendas and supporting documents can be found at: <http://cityofpetaluma.net/cclerk/archives.html>.”

Advisory Groups

The Pedestrian and Bicycle Advisory Committee serves as the Agency Advisory committee for pedestrian and bicycle related duties and function. Subcommittees and Ad-hoc committees can be formed from this group at any time to address more specific passenger-related topics as needed.

The Petaluma Transit Advisory Committee serves as the Agency Passenger Advisory Committee and fulfills other transit-related duties/functions in addition to working with community advisory groups. Subcommittees and Ad-hoc committees can be formed from this group at any time to address more specific passenger-related topics as needed.

Mobility Management Travel Training Programs

Safe Streets & Mobility participates in travel training in various formats, including participating in the Safe Streets for All Program and with partnership with the Sonoma County Bicycle Coalition. As part of the Safe Streets & Mobility Travel Training Program, staff visit Petaluma City Schools to educate students and families on traveling to and from school as well as assessing conditions at each school individually.

Petaluma Transit's travel training consists of training for senior, disabled, and low-income residents (also in Spanish) on using the fixed route bus system and navigating paratransit & mobility alternatives. As part of the Petaluma's Travel Training Program, training is provided via group presentations and question and answer sessions on all the different transportation options available to them in Petaluma, as well as “travel tours” with a guide in which small groups (3-5 people) experience riding the public bus first-hand.

Metropolitan Transportation Commission (MTC) / Public Participation Plan

The MTC plan details a comprehensive outreach program that includes outreach to minority and low-income communities throughout the region. Components of the plan include telephone surveys and focus groups representing the demographic composition of individual Bay Area communities. MTC conducts limited outreach to community-based organizations in minority/low-income areas and provides grants throughout the region to help fund outreach activities, recruitment efforts for meeting participation, and meet language assistance needs via translators and production of multilingual documents. Petaluma Transit is included as part of MTC's regional working group collaborating to address Title VI guidance on public outreach and participation strategies. For more information, and to view MTC's Title VI Plan, see: <https://mtc.ca.gov/about-mtc/access-everyone/civil-rights-act-file-complaint>.

Summary of Past Public Outreach

Safe Streets & Mobility, including Petaluma Transit, has promoted equal access to its programs and services and inclusive participation over the past three years through the following strategies:

- Implementation of the language assistance measures outlined in the Limited English Proficiency Plan (See Attachment C).
- Participated in community events (Butter and Eggs Parade in May – annually).
- Participated in the annual goal setting meetings for the City of Petaluma. Spanish Translators were provided at all meetings.
- All Pedestrian and Bicycle Advisory Committee and Transit Advisory Committee meetings were televised on the local Community Access station and are also available for viewing online live or via archive.
- Coordination and partnership with community organizations.
- Worked closely with the City School District to provide transit information in both English and Spanish.
- Worked closely with the City School District to assess bicycle, pedestrian, and drop off infrastructure to reduce traffic speed and improve access.
- Provided school travel training sessions with youth (8-18 years old) on school campus during orientation periods annually.
- Provided travel training/mobility options events at the Petaluma Senior Center.
- Provided travel training/mobility options events at various senior housing facilities.
- Transit maps tailored to each of the four public middle and high schools were distributed in print and posted online in English and Spanish.
- Periodic focus groups were conducted at the schools and junior college.
- Bilingual advertisement on buses about opportunities to participate with Petaluma Transit.
- Emailed notice of opportunities to participate sent to the City's general mailing list.
- Videos on how to ride the bus were posted online.
- Rider guides for bus and paratransit are provided in large print.
- Website content is provided in multiple languages including Spanish.

- Title VI Program provided on the website in English and Spanish.
- Americans with Disabilities act and accommodations request information was made available online.
- Social media, including Facebook, used to notify riders of changes or delays, upcoming events, or participation opportunities.
- All rider alerts are in both English & Spanish.
- Rider Guide & Paratransit Guide available in English and Spanish.
- All bus schedules at shelters are in both English and Spanish.
- Worked closely with agencies that provide services to low income and/or persons with disabilities to provide bus passes and travel training.

Attachment C: Limited English Proficiency Plan

LIMITED ENGLISH PROFICIENCY PLAN
City of Petaluma – Safe Streets & Mobility

Introduction

Limited English proficiency (LEP) is defined by the limited ability to read, write, speak, or understand English. Safe Streets & Mobility, including Petaluma Transit, ensures that persons with Limited English proficiency shall not be discriminated against nor denied meaningful access to and participation in the programs and services provided by the division at no additional cost.

This Limited English Proficiency Plan describes Safe Streets & Mobility’s, including Petaluma Transit, strategy for providing language assistance for LEP populations. The plan includes a needs assessment based on a four-factor analysis, language assistance measures, a staff training plan, ongoing maintenance measures, and notification methods.

Four Factor Analysis

The following analysis is used to determine the appropriate language services provided to ensure meaningful access to Safe Streets & Mobility, including Petaluma Transit, programs and activities.

Factor 1: Number and proportion of LEP persons served or encountered

Petaluma used the American Community Survey (ACS) 5-Year survey data for 2023 for Limited English Proficient (LEP) Populations in the City of Petaluma to estimate the number or proportion of LEP persons who might use or want to use Safe Streets & Mobility, including Petaluma Transit, services. The American Community Survey (ACS) 5-Year survey data identifies people who speak English “less than very well” as Limited English Proficient persons.

Of the population aged five years and older in the City of Petaluma, 17.17% identified Spanish as their primary language. The following table shows the population broken down by the identified primary language spoken for Petaluma residents.

English Only	75.3%
Spanish	17.1%
Asian and Pacific Islander Languages	3.6%
Other Indo-European Languages	3.3%
Other Languages	0.6%
Speak English “Less Than Very Well”	7.6%

Factor 2: Frequency of LEP populations’ contact with existing programs, activities, and services

Petaluma Transit conducted an onboard bilingual survey (English and Spanish) in 2016. Of the total amount received, only 9.2% were completed in Spanish (28 out of 303). This is a slight increase from 8.1% in 2014, and down from 11.6% in 2012, and 15.7% in 2010. Among registered paratransit riders, 1.5% indicate a language other than English as their primary language. A 2018 survey conducted by the MTC had 4.2% of surveys completed in Spanish.

Factor 3: Importance to LEP populations of programs, activities, and services

Petaluma Transit considers public transit to be an essential service for many residents, commuters, and visitors. The majority of onboard survey respondents who answered in Spanish reported a family income of less than \$40,000 per year. The American Community Survey estimated that 12% of Petaluma residents who commute to work on public transportation speak Spanish or have limited English proficiency.

Factor 4: Resources available to Petaluma Transit and overall cost to provide LEP assistance

Safe Streets & Mobility, including Petaluma Transit, makes a reasonable effort to communicate with LEP persons about available transit services, including bi-lingual staffing of multiple positions. Staff works to improve mobility access for Spanish speaking residents through targeted outreach strategies, translation of vital documents, and travel training (with translation services available as needed). Bilingual staff includes employees Spanish language bus drivers, street supervisors, and operations dispatchers who can help Spanish-speaking persons over the phone or in-person.

Translation assistance is included in a number of outreach and customer service tasks, including through bilingual staff whose salaries are included in personnel budgets.

Language Assistance Measures

The percentage of Spanish-speaking LEP persons in the city of Petaluma meets the Safe Harbor threshold by constituting at least 5% of the total population. This means that Petaluma Transit must provide written translation of vital documents in Spanish in order to comply with the Safe Harbor provision, as adopted by the Federal Department of Transportation. Petaluma Transit meets and exceeds this requirement by providing an array of assistance measures for Spanish-speaking LEP persons. No other languages eligible to be served or likely to be affected or encountered were found to exceed 5% of the total population.

Current language assistance measures to address the needs of LEP persons include the following:

- Permanent Staff position for bilingual dispatcher (contractor position):
 - Answers incoming phone calls in Spanish
 - Responds to customer service inquiries and booking paratransit trips in Spanish
 - Provides oral translation of all documents in Spanish
 - Real-time phone translation assistance in 150+ languages (contracted)
- Transit Specialist:
 - Fosters ongoing relationships with Latino community leaders and community groups, including LEP advocacy groups

- Attends community events
- Staffs Petaluma outreach events about fare and service changes
- Provides travel training with Spanish translation available as needed
- Translates key documents to Spanish
- The following critical written materials are translated to Spanish:
 - System map
 - School-specific transit maps for all public high and middle schools
 - System advisories
 - Website content
 - Title VI Public Notice – print and web
- ADA Paratransit services and materials available in any language:
 - Telephone customer service
 - Eligibility Applications
 - In-person evaluations as needed
 - Paratransit Rider's Guide
- Website postings informing users of available LEP assistance provided in Spanish and in additional languages via Google Translate
- Written notices are provided in Spanish
- Pictography included on fareboxes to indicate proper fare payment procedures without need for written language comprehension.
- Coordination of oral and written translation services for languages other than English.

Methods for Notifying LEP Persons About Available Language Assistance

Safe Streets & Mobility, including Petaluma Transit, will notify LEP persons of available language assistance services through the following methods:

- Written notices in Spanish and English onboard transit vehicles
- Written notices in Spanish and English on display in the transit customer service office
- Notice in Spanish and English on the website
- Including contact information for translation requests on key printed documents
- Posting of bilingual fliers at community centers, libraries, and transit centers
- Participation in local community events.

Methods for Monitoring, Evaluating, and Updating Plan

Safe Streets & Mobility, including Petaluma Transit, will review this plan annually, including:

- Assessing sufficiency of staff training and budget for language assistance
- Reviewing current sources for assistance to ensure continuing availability
- Reviewing and complaints, comments, and suggestions related to LEP assistance

Staff Training Plan

Safe Streets & Mobility, including Petaluma Transit, will ensure effective implementation of this plan by scheduling annual training for existing staff and including effective LEP assistance strategies in orientation training for new staff that regularly interact with the public. Training will

include a review of this plan and how to handle verbal requests for service or information in a language other than English. Annual refresher trainings are provided to bus operators.

Attachment E: US DOT Order 1050.2A Appendices A-E

Title VI Assurances: Appendices A-E (US DOT Order 1050.2A)

APPENDIX A

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the “contractor”) agrees as follows:

1. **Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Federal Highway Administration, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
2. **Non-discrimination:** The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, national origin, age, sex, or disability in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. **Solicitation for Subcontracts, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor’s obligations under this contract and the Acts and the Regulations relative to Non-discrimination on the grounds of race, color, national origin, age, sex, or disability.
4. **Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the FHWA to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the FHWA, as appropriate, and will set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of a contractor’s noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the FHWA may determine to be appropriate, including, but not limited to:
 - a. withholding payments to the contractor under the contract until the contractor complies; and/or
 - b. cancelling, terminating, or suspending a contract, in whole or in part.

6. **Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or the FHWA may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

APPENDIX B

CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

The following clauses will be included in deeds effecting or recording the transfer of real property, structures, or improvements thereon, or granting interest therein from the United States pursuant to the provisions of Assurance 4:

NOW THEREFORE, the U.S. Department of Transportation as authorized by law and upon the condition that the California Department of Transportation will accept title to the lands and maintain the project constructed thereon in accordance with Title 23 U.S.C., the regulations for the administration of the preceding statute, and the policies and procedures prescribed by the FHWA of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the California Department of Transportation all the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit A attached hereto and made a part hereof.

(HABENDUM CLAUSE)

TO HAVE AND TO HOLD said lands and interests therein unto the California Department of Transportation and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on the California Department of Transportation, its successors and assigns. The California Department of Transportation, in consideration of the conveyance of said lands and interest in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or under

such lands hereby conveyed [,] [and]* (2) that the California Department of Transportation will use the lands and interests in lands and interest in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended[, and (3) that in the event of breach of any of the above-mentioned non-discrimination conditions, the Department will have a right to enter or re-enter said lands and facilities on said lands, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction].* (*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to make clear the purpose of Title VI.)

APPENDIX C

CLAUSES FOR TRANSFER OF REAL PROPERTY ACQUIRED OR IMPROVED UNDER THE ACTIVITY, FACILITY, OR PROGRAM

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the California Department of Transportation pursuant to the provisions of Assurance 7(a):

1. The (grantee, lessee, permittee, etc. as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add “as a covenant running with the land”] that:
 - a. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.
2. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Non-discrimination covenants, the California Department of Transportation will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.*
3. With respect to a deed, in the event of breach of any of the above Non-discrimination covenants, the California Department of Transportation will have the right to enter or re-

enter the lands and facilities thereon, and the above described lands and facilities will there upon revert to and vest in and become the absolute property of the California Department of Transportation and its assigns.*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

APPENDIX D

CLAUSES FOR CONSTRUCTION/USE.ACCESS TO REAL PROPERTY ACQUIRED UNDER THE ACTIVITY, FACILITY OR PROGRAM

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by the California Department of Transportation pursuant to the provisions of Assurance 7(b):

1. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, "as a covenant running with the land") that (1) no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishings of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits or, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.
2. With respect to (licenses, leases, permits, etc.) in the event of breach of any of the above of the above Non-discrimination covenants, the California Department of Transportation will have the right to terminate the (license, permits, etc., as appropriate) and to enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.*
3. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, the California Department of Transportation will there upon revert to and vest in and become the absolute property of the California Department of Transportation and its assigns.

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

APPENDIX E

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the “contractor”) agrees to comply with the following non-discrimination statutes and authorities, including, but not limited to:

Pertinent Non-Discrimination Authorities:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 et seq.), prohibits discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.), as amended, (prohibits discrimination on the basis of disability); and 49 CR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 et seq.), prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 U.S.C. § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms “programs or activities” to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination of the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131 – 12189) as implemented by Department of Transportation regulations 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration’s Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures discrimination against minority populations by discouraging programs, policies, and activities with disproportionately

high and adverse human health or environmental effects on minority and low-income populations;

- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 et seq).

Attachment E: Systemwide Standards and Policies

Petaluma Transit

Systemwide Service Standards and Policies

Vehicle Load Standards

Mode	Average Passenger Capacities				
Vehicle Type	Seated	Standing	Total	Max Load Factor – Peak	Max Load Factor – Off-Peak
Regular Routes					
30' Gillig LF	23	19	42	42/23	42/23
35' Gillig LF	34	28	62	62/34	62/34
35' New Flyer EV	30	28	58	58/30	58/30
40' Gillig LF	40	32	72	72/40	72/40
40' New Flyer LF	38	31	69	69/38	69/38
40' New Flyer EV	38	32	70	70/38	70/38
Tripper Routes					
35' Gillig LF	34	28	62	62/34	62/34
35' New Flyer EV	30	28	58	58/30	58/30
40' New Flyer LF	38	31	69	69/38	69/38
40' New Flyer EV	38	32	70	70/38	70/38
40' Van Hool	35	30	65	65/35	65/35

Vehicle Headway Standards

Mode	Peak	Base	Evening
Weekday			
Regular Routes	30-60 minutes	30-60 minutes	30-60 minutes
Tripper Routes	N/A	N/A	N/A
Saturday			
Regular Routes	60 minutes	60 minutes	60 minutes
Sunday			
Regular Routes	60 minutes	60 minutes	60 minutes

On-Time Vehicle Performance Standards

A vehicle is considered on time if it departs a scheduled time-point no more than 1 minute early and no more than 5 minutes late. Petaluma Transit's on-time performance objective is 90%.

Service Availability Standards

Petaluma Transit bus stops are spaced between $\frac{1}{4}$ to $\frac{1}{2}$ mile apart; on average will not be more than four blocks apart.

Vehicle Assignment Policy

Bus Assignments by Size for Transit

Route	30' Buses	35' Buses	40' Buses	Mileage (in Ks)
2/11	2 ND	1 ST	3 RD	152
11/2	2 ND	1 ST	3 RD	152
3/33	2 ND	1 ST	3 RD	223
10/24	1 ST	2 ND	3 RD	151
301	3 RD	2 ND	1 ST	10
302	3 RD	2 ND	1 ST	11
303	3 RD	2 ND	1 ST	12
311 AM	3 RD	2 ND	1 ST	11
311 PM	3 RD	2 ND	1 ST	34
312	3 RD	1 ST	2 ND	34
501 AM	2 ND	1 ST	3 RD	23
501 PM	2 ND	1 ST	3 RD	23
LumaGo Shuttle	24' Cutaway			
LumaGo Shuttle	24' Cutaway			
				846

Petaluma Transit has a vehicle fleet fewer than 50 vehicles.

Transit Amenities Policy

Petaluma Transit assigns transit stop amenities based on the average count of boardings and alightings, site suitability, physical constraints, and proximity to nearby destinations and services.