

CITY OF RIPON



Title VI Program

Submitted in accordance with
Federal Transit Administration
Circular 4702.1B

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Reference: *FTA Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration (FTA) Recipients (October 1, 2012).*

I. INTRODUCTION

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.”

The Federal Transit Administration (FTA) is required to ensure that federally supported transit services and related benefits are provided consistent with Title VI. As such, all recipients of FTA funds are required to have a Title VI program on file with FTA. The purpose of this Title VI Program is to establish guidelines to effectively monitor and ensure that as a recipient of federal funds the City of Ripon transit services comply with FTA Title VI requirements. This program shall be uploaded into FTA’s Transportation Electronic Award Management (TEAM) system and updated every three years no fewer than sixty calendar days prior to the date of expiration of the Title VI Program. *See Exhibit G for Updates/Record of Changes.*

The City of Ripon 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 by creating and maintaining a public transportation system that is free of all forms of discrimination. The City of Ripon 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.



II. BLOSSOM EXPRESS SERVICE AREA MAP





III. CITY OF RIPON OBJECTIVES

- A. Ensure that the level and quality of transportation service is provided without regard to race, color or national origin.
- B. Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations.
- C. Promote the full and fair participation of all affected populations in transportation decision making.
- D. Prevent the denial, reduction or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- E. Ensure meaningful access to programs and activities by persons with limited English proficiency (LEP).



IV. ENVIRONMENTAL JUSTICE REQUIREMENTS

- A. The City of Ripon shall integrate an environmental justice analysis into its National Environmental Protection Act (NEPA) documentation of construction projects. City of Ripon is not required to conduct environmental justice analyses of projects where NEPA documentation is not required. City of Ripon will consider preparing an environmental assessment (EA) or environmental impact statement (EIS) to integrate into its documents the following components when performing construction projects:
- B. 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);
- C. A discussion of all adverse effects of the project both during and after construction that would affect the identified minority and low-income populations;
- D. 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;
- E. 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 adverse community effects such as separation or cohesion issues; and the replacement of the community resources destroyed by the project;
- F. A discussion of the remaining effects, if any, and why further mitigation is not proposed; and
- G. 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), is a statute that 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.



V. TITLE VI PROGRAM CONTENT REQUIREMENTS

The FTA has established specific guidelines for Title VI general compliance. The City of Ripon compiles and maintains data as required by the FTA. Title VI General Reporting Requirements are listed below. The City of Ripon's efforts to satisfy these requirements are outlined in *italics* below:

A. Title VI Notice to the Public

In order to comply with 49 CFR, Section 21.9(d), the City of Ripon shall provide information to the public regarding the City of Ripon's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

The City of Ripon informs members of the public of its Title VI protection rights by posting its Title VI Notice to the Public, as shown in Exhibit A in both English and Spanish. The Title VI Notice to the Public is posted at several locations, including on buses, inside Transit brochures and on the City's website, www.cityofripon.org.

B. Title VI Complaint Procedures and Complaint Form

The City of Ripon is required to develop procedures for investigating and tracking Title VI complaints filed against the City of Ripon and to make these procedures for filing a complaint available to the general public.

Please refer to Exhibits B and C for a copy of the City of Ripon's Title VI Procedures for Filing a Complaint and Complaint Form. The details of how to lodge a complaint under Title VI are included in all public notices describing Title VI.

C. Transit-Related Title VI Investigations, Complaints, and Lawsuits

The City of Ripon 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.

Currently, no active complaints, investigations, or lawsuits have been filed against the City of Ripon alleging discrimination on the basis of race, color, national origin, or disability with respect to transit service. As a result, no investigations have been conducted.

D. Public Participation Plan

The City of Ripon is required to develop a Public Participation Plan that includes information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission.



Please refer to Exhibit D for a copy of the City of Ripon's Public Participation Plan as well as a summary of outreach efforts.

E. Title VI Equity Analysis

If the City of Ripon has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc. a Title VI equity analysis is required. The City of Ripon does have a transit storage facility, recently built in 2018. During the planning stages of this project, a Title VI equity analysis was completed to ensure the location was selected without regard to race, color, or national origin. This report is available from Ripon City Hall, 259 N. Wilma Avenue, Ripon, CA 95366.

The City of Ripon has not constructed any new facilities during the Title VI reporting period.

F. Language Assistance Plan

The City of Ripon must have a language assistance plan for providing language assistance to persons with limited English proficiency (LEP). Title VI and its implementing regulations require that FTA recipients take reasonable steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP.

Please refer to Exhibit E for a copy of the City of Ripon's Limited English Proficiency (LEP) Plan.

G. Minority Representation on Planning and Advisory Bodies

If the City of Ripon has transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the City of Ripon City Council, we must provide a table depicting the racial breakdown of the membership of such committees or councils and a description of efforts made to encourage the participation of minorities on such committees.

The City of Ripon does not have any transit advisory committees or non-elected committees. Therefore, a table is not included in this Plan.

H. System-Wide Standards and Policies

FTA requires all fixed-route transit providers to develop quantitative standards and policies for their fixed-route service. Individual public transportation providers will set the standards that will apply to their individual agency, rather than across the entire transit industry.

The City of Ripon has included a detailed description of the System-Wide Standards and Policies in Exhibit F.



VI. EXHIBITS

The following exhibits, listed below, are incorporated into this plan.

- Exhibit A Title VI Notice to the Public
- Exhibit B Title VI Complaint Procedures
- Exhibit C Title VI Complaint Form
- Exhibit D Public Participation Plan
- Exhibit E Language Assistance Plan
- Exhibit F System-Wide Standards and Policies
- Exhibit G Updates/Record of Changes



EXHIBIT A - TITLE VI NOTICE TO THE PUBLIC

CITY OF RIPON'S Non-Discrimination Statement

Title VI of the Civil Rights Act of 1964 states, "No person in the United States, shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." In compliance with U.S. Department of Transportation Title VI regulations (49 CFR Part 21), the City of Ripon operates without regard to race, color, or national origin. Any person who believes he or she has been discriminated against by the City of Ripon on the basis of race, color, or national origin may file a written complaint with the City of Ripon. All complaints must be in writing and must be filed within 60 calendar days of the alleged incident. If an individual is unable to write a complaint, a representative may file on his or her behalf, or the City of Ripon staff will provide assistance. For more information, contact the City of Ripon by any of the following methods:

Phone: 209-599-2108
Mail: City of Ripon, Attn: Liaison Officer, 259 N. Wilma Ave., Ripon, CA 95366
Email: liaisonofficer@cityofripon.org



Declaración de No Discriminación de la CIUDAD DE RIPON

El Título VI de la Ley de Derechos Civiles de 1964 establece: "Ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, será excluida de la participación, se le negarán los beneficios o será objeto de discriminación bajo cualquier programa o actividad que reciba asistencia financiera federal". En cumplimiento con las regulaciones del Título VI del Departamento de Transporte de los EE.UU. (49 CFR Parte 21), la Ciudad de Ripon opera sin ninguna consideración de raza, color u origen nacional. Cualquier persona que crea que la Ciudad de Ripon lo ha discriminado por motivos de raza, color u origen nacional puede presentar una queja por escrito ante la Ciudad de Ripon. Todas las quejas deben presentarse por escrito y deben presentarse dentro de los 60 días calendario posteriores al supuesto incidente. Si una persona no puede escribir una queja, un representante puede presentarla en su nombre, o el personal de la Ciudad de Ripon proporcionará asistencia. Para obtener más información, comuníquese con la Ciudad de Ripon por cualquiera de los siguientes métodos:

Teléfono: 209-599-2108

Correo postal: City of Ripon, Attn: Liaison Officer, 259 N. Wilma Ave., Ripon, CA 95366

Email: liaisonofficer@cityofripon.org



TITLE VI NOTICE TO THE PUBLIC ONLINE AT
<http://www.cityofripon.org/291/Blossom-Express>

TITLE VI (Non-discrimination)

The City of Ripon is a direct recipient of Federal financial assistance. All recipients are required to comply with Title VI of the Civil Rights Act of 1964 (Title 23 CFR Part 200 and Title 49 CFR Part 21), as well as related statutes and regulations.

View [The City of Ripon's Non-Discrimination Statement.](#)

Any person/s who believes they have been subjected to unlawful discrimination on the basis of race, color, or national origin may file a complaint. The complaint may be filed by the individual or his/her representative. All complaints must be in writing and filed no later than 60 calendar days of the alleged discrimination.

Please complete the [Title VI Complaint Form](#) to file a complaint.

The Title VI Notice to the Public is posted at several locations, including on buses, inside Transit brochures and on the City's website, www.cityofripon.org.



EXHIBIT B - TITLE VI COMPLAINT PROCEDURES

Submission of Complaints

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the City of Ripon (hereinafter referred to as "City") may file a Title VI complaint by completing and submitting the City of Ripon Title VI Complaint Form. Complaints may be filed either in writing, setting out the details of the complaint, or by telephone. If a complaint is filed by telephone, the Liaison Officer will encourage the complainant to complete the Title VI Complaint Form or may complete it on behalf of the complainant with the information received during the telephone conversation. **The City of Ripon investigates complaints received within 60 calendar days of the alleged incident.** The City of Ripon will process complaints that are complete.

Written complaints shall include:

- Date of the alleged discrimination.
- Date when the complainant(s) became aware of the alleged act of discrimination; or
- Date that conduct was discontinued or the latest instance of conduct.
- Detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.

The complaint can be sent to the following:

- City of Ripon, Attn: Liaison Officer, 259 N. Wilma Avenue, Ripon, CA 95366, fax to: 209.599-2685 or email to: liaisonofficer@cityofripon.org.

A person may also file a complaint with the following agencies:

- Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590. In accordance with FTA Circular 4702.1B, Chapter 9, complaints must be filed **within 180 calendar days of the alleged discriminatory act.**
- The Federal Equal Employment Opportunity Commission. Complaints must be filed **within 180 days of the alleged discriminatory act or 300 days if the charge is also covered by a state or local anti-discrimination law.**

Investigation of Complaints

All complaints, which allege illegal harassment, are serious and shall be investigated immediately. Depending upon the circumstances of the complaint, the investigation will be conducted by the Liaison Officer, City Administrator, City Attorney, or private investigator. If more information is needed to resolve the case, the City may contact the complainant. The complainant has 30 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does



not receive the additional information within 30 business days, the City can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters 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, which may include termination, additional training of the staff member or other action will occur. The disciplinary action/termination will be taken pursuant to the collective bargaining unit, if any, applicable to the offender.

Appeals Process

If the complainant wishes to appeal the decision with the City, she/he has 30 calendar days after the date of the closure letter or the letter of finding (LOF). Within 30 calendar days after receiving the appeal, the City will respond in writing with a final resolution of the complaint.

If you need more information about the City of Ripon Title VI policy, help with the classification of a Title VI complaint, or a document translated into a language other than English; please call 209-599-2108.

Si necesita más información sobre la política del Título VI de City of Ripon, ayuda con la clasificación de la queja del Título VI o traducir un documento en un idioma distinto del inglés, llame al 209-599-2108.



EXHIBIT C - TITLE VI COMPLAINT FORM

City of Ripon

259 North Wilma Avenue, Ripon, California 95366
 Phone: (209) 599-2108 Fax: (209) 599-2685
www.cityofripon.org



Title VI Complaint Form

SECTION I

- Name _____
- Street Address: _____ • City/State/Zip: _____
- Telephone (home/cell): _____ • Telephone (work): _____ • Email: _____
- Do you require an accessible format? Yes No If yes, check all that apply.
 Large Print TTY/TDD Audio Tape Other _____
- Are you filing this complaint on your own behalf? Yes No
 If yes, go to Section II. If no, complete the following:
- Name of person for whom you are filing: _____
- Relationship to person for whom you are filing: _____
- Have you obtained permission from this person? Yes No
- Please explain why you are filing for this person.

SECTION II

- Which of the following best describes the reason for the alleged discrimination? (check one) Race Color National Origin
- Date of Incident:
- Please provide as much detail concerning the alleged discrimination. 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 discriminated against you (if known) as well as names and contact information of any witnesses. Attach any written materials or other information that you think is relevant to your complaint.

SECTION III

- Have you previously filed a Title VI complaint with the City of Ripon? Yes No
- 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: _____ State Agency: _____ Local Agency: _____
 Federal Court: _____ State Court: _____ Local Court: _____
- Please provide contact information for the person you spoke to at the above agency.
- Name _____ • Title: _____
- Street Address: _____ • City/State/Zip: _____
- Telephone _____

SECTION IV

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

Applicant/Authorized Representative SIGNATURE _____

PRINT Name _____

Date Submitted _____

Upon completion of this form, please mail to
 City of Ripon, Attn: Liaison Officer, 259 N. Wilma Avenue, Ripon, CA 95366
 or email to liaisonofficer@cityofripon.org

If you need assistance completing this form, please contact the City of Ripon at 209-599-2108.



EXHIBIT D - PUBLIC PARTICIPATION PLAN

Introduction

Ripon is a small city of 15,741 people located in the Central Valley of California between Stockton and Modesto. It is part of the unurbanized area within the State of California and has its own small-town feel and sense of identity.

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 of Ripon 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, review of transit services, fares and operating perimeters and Federal Transit Administration civil rights issues such as Title VI, Disadvantage Business Enterprise (DBE), Equal Opportunity Program (EEO), Americans With Disabilities Act (ADA) and through the San Joaquin Council of Governments (SJCOCG), the Unmet Transit Needs Hearing, Transportation Improvement Program and the Public Participation Process. Through this *Public Participation Process*, the City aims to identify methods for obtaining public input and encouraging public participation in the transportation planning process.

Historical Information

In 2010, a Short Range Transit Plan ("SRTP") was completed to evaluate the need for transit services in the City of Ripon and determine the most appropriate strategies to meet those needs. During the preparation of the Short Range Transit Plan, surveys, public meetings, and individual interviews were conducted to include the public's participation in their transit needs and the implementation of the plan. The public's participation in this plan included the youth and elderly, low- and high-income households, and disabled persons. It was noted that Ripon has an active senior community, and this may increase the need for transportation.

The SRTP 2010-2020 recommended a fixed route service to enhance Ripon's transit service, which only included a Dial-a-Ride service at that time. This fixed route would include bus stops at the senior communities throughout Ripon, the Save Mart grocery store, Kaiser Permanente medical facilities in Modesto and Vintage Faire Mall. The fixed route service, known as the Blossom Express, also provides for deviations for all passengers. In 2013 and 2018, a 35 foot, 30 passenger bus was purchased, and in 2013 the City of Ripon began operating a fixed route service, with deviations, two days per week. The route and the need continue to be monitored by the City of Ripon to ensure that the public needs are being met.



Whenever there is a route or schedule change to the fixed route service, a Public Hearing is held at a City Council meeting and appropriate notice is given for this Hearing. The bus route was last changed in August 2016.

Blossom Express services are provided under contract with the San Joaquin Regional Transit District (RTD). This contractual arrangement has been in place since 2013. RTD directly operates this service. The present services include a deviated fixed route service with the City limits and into Modesto, which is in Stanislaus County and a volunteer dial-a-ride program operated by Bethany Home.

The City recognizes the importance and necessity of the public participation process.

The Ripon City Council sets the overall policy for the transit system. The City Council consists of five members who meet on the 2nd Tuesday of each month at 6:00 pm in the City Council Chambers at City Hall.

All meetings of the Ripon City Council are open to the public, and members of the public may request time on the agenda of the Ripon City Council to comment on specific subjects of interest to the City Council Members. A minimum of two weeks' advance notice should be given for requested agenda time. The City aims to provide this opportunity for its citizens so they may have a platform to formally comment on the specific subjects of interest to the City Council Members.

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. SJCOG facilitates an annual public hearing regarding the City of Ripon's unmet transit needs. At this time, there are no unmet needs that have been brought to the City's attention that have not been implemented per SJCOG's most recent FY 24-25 Unmet Transit Needs Assessment Report.

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 the disadvantaged and/or minority groups;
- Media – newspapers, television, radio;
- Governmental agencies;
- Educational Institutions (school districts, community colleges, private schools, State universities); and
- 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 of the City's transit system is available for public review. The information can be viewed at the Ripon City Hall, 259 N. Wilma Avenue, Ripon, CA 95366. Additional information is posted online at www.cityofripon.org.

Outreach Techniques

Information about all the City meetings, as well as special activities related to transit planning, Title VI and project development, is posted at Ripon City Hall, distributed to the local newspapers (Manteca/Ripon Bulletin, Modesto Bee, The Record) and placed on the City's website, www.cityofripon.org, a minimum of 72 hours prior to the meetings.

Press releases are distributed to the local newspaper and sent out to citizens through a social media application called Nixle. These press releases are used to notify citizens of upcoming activities of the City.

The City's website, www.cityofripon.org, is used to provide information about the City's activities including information about the development of the Short Range Transit Plan and Federal Transit Administration civil rights documents such as Title VI and others. The City's representatives are listed along with their contact information. Links to SJCOG's website is available for the Transportation Improvement Program and Unmet Transit Needs Hearing.

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

The City of Ripon distributes transit schedules and rider information on buses, at Ripon City Hall, Ripon Library, Bethany Home and on the City's website, www.cityofripon.org.

Public Meetings

The City of Ripon reaches out to the community directly through meetings with agency and community staff and their clients, as needed. Information regarding the City of Ripon's transit services is disseminated at these meetings. Information is also made available at various locations throughout the community, including Ripon City Hall, Ripon Library, on buses and on the City of Ripon's website at www.cityofripon.org.

When transit issues are discussed, the City of Ripon schedules transit workshops to invite the public to provide feedback on transit related issues and also uses the City Council, who sets the policy for the City's transit services, as an opportunity to gather public feedback before enacting on a decision.



The City of Ripon participates in the development of the SJCOG's "Public Participation Plan" and the San Joaquin County Coordinated Public Transit and Human Services Transportation Plan as a committee member, when requested. In addition, City staff uses a number of public outreach techniques as cited in these plans. When the plan was developed, a series of 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 of Ripon, 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 passengers to convey any concerns or comments they have regarding Ripon's transit services.

Input Mechanisms

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

- The City's website at www.cityofripon.org
- By mail to 259 N. Wilma Avenue, Ripon, CA 95366.
- By emailing to liaisonofficer@cityofripon.org.
- By faxing a request or letter to (209) 599-2685.

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

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.

The City does consider and respond to all public input received during the planning and program development processes. If a significant number of written or oral comments are received on transit services or FTA civil rights or plans, a summary, analysis and report on the disposition of the comments will be 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/Ripon Bulletin prior to the meeting.



Public meetings regarding transit needs occur on an as needed basis based on specific subject matter such as the development of the Short Range Transit Plan, review of transit services, fares and operating perimeters, and Federal Transit Administration civil rights issues such as Title VI, Disadvantage Business Enterprise, Equal Opportunity Program and Americans with Disabilities Act. 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.

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.



EXHIBIT E - LANGUAGE ASSISTANCE PLAN

Introduction

This Language Assistance Plan has been prepared to address the City of Ripon'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 4702.1B dated October 1, 2012, which states 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 that receive federal funds, including City departments receiving federal grant funds.

Background

The City of Ripon administers transit services under a contract with San Joaquin RTD for deviated fixed route services and with Bethany Home for dial-a-ride services. The Ripon City Council is the policymaking body for the transit system.

Ripon's transit services consist of a deviated fixed route on Tuesdays and Thursdays from 9:25 a.m. to 2:05 p.m.

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

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. In order to prepare this plan, the City of Ripon undertook the U.S. Department of Transportation four-factor LEP analysis, which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter the City of Ripon's transit activities or services.
2. The frequency with which LEP persons come in contact with transit activities or services.
3. The nature and importance of programs, activities, or services provided by the to the LEP population.



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

A summary of the results of four-factor analysis is reflected in the following section.

Meaningful Access: Four-Factor Analysis

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter the City of Ripon's transit activities, or services.

The 2020 United States Census reported that Ripon had a population of 16,103. The racial makeup of Ripon was as follows:

	NUMBER	PERCENTAGE
Asian	964	5.99%
African American	201	1.25%
White	10,858	67.42%
Native American & Pacific Islander	28	0.17%
Other Races	1,505	9.35%
Two or More Races	2,547	15.82%
TOTALS	16,103	100%

Hispanic or Latino of any race were 3,999 persons (24.8%).

Of its 16,103 total residents, the City is the home of only 749 residents who speak English "less than very well" – this represents only 4.6 percent of the City's population. This was reported in the American Community Survey of the U.S. Census Bureau (2022). People of Spanish descent are the primary LEP persons likely to be involved with the City transit services.

2. The frequency with which LEP come in contact with transit services.

City of Ripon staff reviewed the frequency with which the Liaison Officer and contractors staff that could have contact with LEP persons. The City's contracted bus drivers receive requests for translated documents infrequently, and no requests for translators have been reported.

Bus operators are in regular contact with persons on Ripon's transit services of which the majority is English speaking



3. The nature and importance of programs, activities, or services provided by the transit services to the LEP population.

Demographic and survey data show that the City of Ripon's transit passengers are primarily Caucasian, with Spanish comprising the next largest group of passengers.

As part of the preparation of the City's Short Range Transit Plan, 2010-2020, LCS Transportation Consultants, Inc. administered a City-wide survey to collect data on usage of and access to Ripon's transit services. According to the survey, the most common age that would need public transportation was 65 or older. Since implementing the services of the Blossom Express, the City of Ripon has found that the majority (68%) of their ridership is people age 65 or older.

To further assess personal mobility options, the City tracks the number of passengers in wheel chairs or with disabilities. Five percent of the ridership is in a wheel chair with an additional 2.5% having a disability without a need for a wheel chair. Without Ripon's transit services, these individuals would need to rely on a friend or family member or would not be able to make trips. This data would indicate that Ripon's transit services are very important as a primary means of transportation for its passengers.

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

The City of Ripon's has limited resources available to passengers. Passengers do have access to other nonprofit organizations in the City of Ripon and the San Joaquin and Stanislaus County Social Services Agencies to provide LEP assistance at low or no cost.

The above resources will be used as needed to assist in identifying needs of the City of Ripon LEP population. They will also serve as a means to widely disseminate bilingual transit service information and announcements and to notify the LEP population of planned workshops and outreach efforts.

Based on the four-factor analysis, the City of Ripon will develop its LEP Plan as outlined in the following section.

Safe Harbor Provision

As a recipient of federal funding, the City is required by the Federal law's "Safe Harbor" provision to undertake reasonable efforts to provide translation of vital written documents, as needed. The written translation need is based on each eligible LEP language group that constitutes 5 percent or 1,000 individuals, whichever is less, of the population eligible to be served or likely to be affected or encountered.

The safe harbor provision does not affect the requirement to provide meaningful access to LEP individuals through oral interpreters, when oral language services are needed and are reasonable.



Translation of documents, if needed, can be provided orally. The failure to provide written translations under the circumstances outlined above does not mean there is noncompliance. Instead, the safe harbor provisions provide a guide to enhance compliance requirements that can be provided by a fact-intensive, four factor analysis.

Identification of LEP Population

The City of Ripon has developed several possible ways to assist in identifying LEP populations within the City, including:

1. Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Survey vehicle operators and other front-line staff on their experience concerning any contacts with LEP persons.
3. Network with local social and human services organizations to assist in identifying LEP groups and individuals most in need of LEP assistance and to further facilitate dissemination of information about the City of Ripon's transit services.

Language Assistance Measures

The City of Ripon is committed to making its services and programs available to LEP persons and recognizes the need to continue providing language services within the City. There are plans for several language assistance options available to LEP persons, including both oral and written language services. There are also various ways in which transit staff can respond to LEP persons, whether in person, by telephone, or in writing.

- When holding information meetings regarding the City of Ripon's transit programs, a public notice of the event should be published including notice that translator or interpreter services are available with advanced notice.
- Survey contracted bus operators, dispatchers, and other front-line staff on their experience concerning any contacts with LEP persons during the previous year.
- Post City of Ripon Title VI Policy and LEP plan on the City's website, www.cityofripon.org.
- When an interpreter is needed, in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers.



Outreach Techniques

Engaging minority and LEP populations can be challenging. Below is a list of outreach techniques that the City will use to actively solicit public input into the City of Ripon's transit program.

Public Outreach Activities

The City of Ripon website posts transit information at www.cityofripon.org.

The City of Ripon reaches out to the community directly through meetings with agency and community staff and their clients, as needed. Information regarding the transit services is disseminated at these meetings, including schedules and appropriate fliers. Transit information also is made available at a variety of locations throughout the community and on buses.

Public Meetings

The City of Ripon conducts and participates in transit meetings that are open to the general public. The City of Ripon collaborates with SJCOG, and other agencies regarding public meetings relating to public transit services.

Participation in Community Activities

The City staff uses a number of public outreach techniques cited in the San Joaquin Council of Governments "Public Participation Plan" as well as the Public Participation Plan in Exhibit D, which include the following:

- Information/comment tables, kiosk, or booths at community events and public gathering places.
- Form project working group during plan development to review documents for readability.
- Partner with community-based organizations for targeted outreach. For major planning efforts, such as a Short Range Transit Plan, partner with and conduct outreach to community-based organizations that serve LEP populations to support outreach and participation.
- Co-host workshops with community groups, business associations, etc.
- Encourage opportunities for public input directly to City Council members.
- When passengers communicate with City staff and state a language preference, requested materials are provided in the requested language, if not cost prohibited.
- Notify public via e-mail, newsletters, printed materials, local media, and notices placed on board transit vehicles.

Techniques for Involving Limited-English Proficient Populations

- Personal interviews or use of audio recording devices to obtain oral comments.
- Translated documents and web content on key initiatives.



- On-call translators for meetings.
- Translated news releases and outreach to alternative language media, such as radio, television, newspapers, and social media.
- Include information on meeting notices on how to request translation services.
- Robust use of visualization techniques, including maps and graphics to choices being debated, etc.
- Train staff to be alert to and anticipate the need of low-literacy participants in meetings, workshops, and the like.
- Information/comment tables or booths at community events and public gathering places.
- Comment cards /"take one" cards on board transit vehicles.

This plan is available here: <https://www.sjcog.org/127/Public-Participation-Plan>.

LEP Training and Implementation by City Staff

- When new hires start employment, City's Liaison Officer provides copies to the employee of its own policies and procedures regarding Title VI. These materials have been updated to include City's policy on outreach to and communication with limited-English speaking persons.
- As new policies/procedures are developed, or existing policies/procedures are amended, these new documents are distributed to affected employees through various methods, including but not limited to paper distribution, electronic documents, postings in employee break rooms, and scheduled group or individual training sessions.
- Vehicle operators, who are the most direct point of contact for LEP persons, have several methods to respond to an LEP individual. In many instances, LEP individuals are accompanied by a companion who speaks English and can translate for the passenger. In addition, some vehicle operators are bilingual. If vehicle operators are not bilingual, they are instructed to ask for assistance from a bilingual passenger. In the few cases where there is no one on the bus who can offer language assistance, the bus operator contacts the Liaison Officer for assistance.

Assurances

The City of Ripon will ensure that no person, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964, will be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination. Further, City of Ripon will notify the public of protections against discrimination afforded them by Title VI regulations and will take preventive corrective and disciplinary action necessary to stem behavior that violates the rights and privileges the regulations are designed to protect.



Monitoring and Updating the LEP Plan

The City of Ripon will update the LEP as required by U.S. Department of Transportation. At a minimum, the plan will be reviewed and updated when data from the U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the City of Ripon's transit service area.

Updates will include the following:

Documentation of LEP Personal Contacts

- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether the City of Ripon's financial resources are sufficient to fund language assistance resources needed.
- Determine whether the City of Ripon has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the City of Ripon failure to meet the transit needs of LEP individuals.

Availability of Title VI Plans and Procedures

The City of Ripon Language Assistance Plan and the Title VI procedures are included in the City of Ripon's website at www.cityofripon.org. Any person or agency with internet access will be able to access and download the plan from the City of Ripon's website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person. LEP individuals may request copies of the plan in translation which the City of Ripon will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to City of Ripon's Liaison Officer:

City of Ripon, Attn: Liaison Officer,
259 N. Wilma Avenue, Ripon, CA 95366,
fax to: 209-599-2685,
call to: 209-599-2108, or
email to: liaisonofficer@cityofripon.org.



EXHIBIT F - SYSTEM-WIDE STANDARDS AND POLICIES

Service Standards

1. Vehicle Load

Measure: Provides service levels to prevent overcrowding and standees.

The City of Ripon's average maximum load factor for fixed route service is not to exceed 1.20, as measured by a ratio of total passengers to seats on board the vehicles. This equates to a maximum of approximately five (5) standees on a 30 seat vehicle.

The average of all loads of the Dial-a-Ride service should not exceed the vehicles number of seats.

The City works closely with its contractor to ensure passengers are not left behind due to overcrowding or overloads. Overcrowding is monitored on fixed route service monthly. The City provides bus service using 35 foot buses to minimize overcrowding.

Buses in City fleet currently used have seating capacities of:

Make	Model	Seats
Gillig	35-foot	30
Gillig	35-foot	30
Ford	E350	9

2. Vehicle Headway

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

The City of Ripon's fixed route service provides a route that travels throughout Ripon and into Modesto. This route is running four times by one bus on Tuesdays and Thursdays. In our Short Range Transit Plan, that was the need that was identified.

Scheduling involves the consideration of a number of factors including: ridership productivity, transit/pedestrian friendly streets, density of transit-dependent population and activities, relationship to the Short Range Transit Plan and Regional Transportation Plan, relationship to major transportation developments, land use connectivity, and transportation demand management. We continue to monitor if the transit need within the City of Ripon is more than what is being provided.

3. On-time Performance

Measure: Provides accessible and reliable transit services to Ripon



To ensure reliable services, the City aims to have a 90% on-time performance target at major stops and an 80% on-time performance target at minor stops for fixed route operations. In addition, the City standard is less than 1% of fixed-route trips missed or removed from the daily schedule. For dial-a-ride services, the standard for on-time performance is at least 90% of all dial-a-ride trips arriving within the thirty-minute (30) pick-up window.

4. Service Availability

Measure: Provides accessible and reliable transit services to Ripon

The City goal is to provide transit service to major origins and activity centers within Ripon with connecting services to Modesto and Stockton. The City of Ripon will provide transit service so that 85% of all residents in the service area are within a ½ mile of bus service.

Service Policies

1. Vehicle Assignment Policy

The vehicle assignment policy is designed to provide the framework for the distribution of buses in an equitable fashion throughout the system. All vehicles used in transit service will be ADA accessible and accommodate at least two wheelchairs and two bicycles. Vehicle size and capacity will be assigned based on demand and passenger load factors.

2. Transit Amenities Policy

The transit amenities policy is designed to provide the framework for the distribution of bus stop amenities equitably throughout the system. When resources allow for improvements at multiple stop locations, the City will prioritize resources based on passenger activity and transfer opportunities. The City will also recognize the amount of observed boarding versus alighting activity when siting amenities such as shelters, benches, and real-time information screens.

In situations where the City has the authority and available resources to site new amenities at multiple bus stops, amenities will be programmed for placement at those stops based on a ranked score. Amenities may include, but are not limited to, shelters, seating, trash receptacles, and transit information displays. Rankings are based on total scores assigned to each candidate stop and are based on weighted factors, including passenger boarding, transfer opportunities, and access to major activity nodes. While the City will use rankings to program the installation of amenities, external factors (e.g., site limitations, regulations of local jurisdictions, etc.) may dictate that amenities be installed out of order or not at all. Maintenance and replacement of existing amenities will not be subject to ranked scoring.



EXHIBIT G - UPDATES/RECORD OF CHANGES

City of Ripon Title VI Program approvals:

City of Ripon City Council: 03/10/2020

Once the requirements for a Title VI Program have been reviewed and approved by FTA, agencies do not need to re-submit a full Title VI program. Agencies may submit a Title VI Program Update every three years no fewer than sixty calendar days prior to the date of expiration of the Title VI Program. Refer to FTA's current "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" for update requirements.

Revision Number	Description	Date	Revision Number	Description	Date
1	John Andoh updated pages 14-18, 20-22	8/1/24	16		
2	Inserted Spanish Notice – pg. 9	10/9/24	17		
3			18		
4			19		
5			20		
6			21		
7			22		
8			23		
9			24		
10			25		
11			26		
12			27		
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14			29		
15			30		