

**EASTERN SIERRA  
TRANSIT AUTHORITY'S  
TITLE VI PROGRAM**

**Approved by Eastern Sierra Transit Authority's  
Board of Directors:**

**INTRODUCTORY:**

This document was prepared by Eastern Sierra Transit Authority and approved by its Board of Directors to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients."

## Table of Contents

|   |    |
|---|----|
| Title VI Notice to the Public   | 4  |
| List of Locations Where Title VI Notice Is Posted                         | 4  |
| Title VI Complaint Procedures   | 5  |
| Title VI Complaint Form   | 7  |
| List of Transit-Related Title VI Investigations, Complaints, and Lawsuits | 9  |
| Public Participation Plan   | 10 |
| Summary of Outreach Efforts Made Since 2014 Title VI Submission           | 10 |
| Language Assistance Plan  | 12 |
| Membership of Non-Elected Committees And Councils                         | 13 |
| Service Standards   | 13 |
| Vehicle Load Standards  | 13 |
| Vehicle Headway Standards   | 14 |
| On Time Performance   | 14 |
| Service Availability  | 14 |
| Vehicle Assignment Policy   | 15 |
| Transit Amenities Policy  | 16 |
| Board of Directors Approval of ESTA's Title VI Program                    | 17 |
| Attachment A – Public Participation Plan                                  | 18 |
| Attachment B – Language Assistance Plan                                   | 24 |
| Attachment C – Census Block Populations                                   | 34 |

## Eastern Sierra Transit Authority's Title VI Notice to the Public

ESTA hereby gives public notice that it is the policy of the Eastern Sierra Transit Authority to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice and related statutes and regulations in all programs and activities. Title VI requires that no person in the United States of America shall, on the grounds of race, color, or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which ESTA receives federal financial assistance. Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with ESTA. Any such complaint must be in writing and filed with ESTA's Transit Analyst within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. For more information, or to obtain a Title VI Discrimination Complaint Form, call ESTA at 760.872.1901.

### List of Locations Where Title VI Notice Is Posted

Eastern Sierra Transit Authority's Title VI notice to the public is currently posted at the following locations:

| Location Name      | Address            | City              |
|--------------------|--------------------|-------------------|
| Bishop Office      | 703 Airport Road   | Bishop, CA        |
| Mammoth Office     | 210 Commerce       | Mammoth Lakes, CA |
| Stops and Vehicles | Inyo & Mono County |                   |

The Title VI notice and program information is also provided on Eastern Sierra Transit Authority's website at:  
[www.estransit.com](http://www.estransit.com)

## Title VI Complaint Procedures

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964, relating to any program or activity administered by ESTA or its subrecipients, consultants, and/or contractors. Intimidation or retaliation of any kind is prohibited by law.

These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the Transit Analyst may be utilized for resolution, at any stage of the process. The Transit Analyst will make every effort to pursue a resolution to the complaint. Initial interviews with the complainant and the respondent will request information regarding specifically requested relief and settlement opportunities.

### Procedures

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by Title VI nondiscrimination provisions may file a written complaint with ESTA's Transit Analyst. A formal complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant. The complaint must meet the following requirements.
  - a. Complaint shall be in writing and signed by the complainant(s).
  - b. Include the date of the alleged act of discrimination (date when the complainant(s) became aware of the alleged discrimination; or the date on which that conduct was discontinued or the latest instance of the conduct).
  - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complained-of incident.
  - d. Allegations received by fax or e-mail will be acknowledged and processed, once the identity(ies) of the complainant(s) and the intent to proceed with the complaint have been established. The complainant is required to mail a signed, original copy of the fax or e-mail transmittal for ESTA to be able to process it.
  - e. Allegations received by telephone will be reduced to writing and provided to complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign, and return to ESTA for processing.
2. Upon receipt of the complaint, the Transit Analyst will determine its jurisdiction, acceptability, and need for additional information, as well as investigate the merit of the complaint.
3. In order to be accepted, a complaint must meet the following criteria: The complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant.

- a. The allegation(s) must involve a covered basis such as race, color, or national origin.
- b. The allegation(s) must involve a program or activity of a Federal-aid recipient, subrecipient, or contractor.
- c. The complainant(s) must accept reasonable resolution based on ESTA's administrative authority (reasonability to be determined by ESTA).
4. A complaint may be dismissed for the following reasons:
  - a. The complainant requests the withdrawal of the complaint.
  - b. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
  - c. The complainant cannot be located after reasonable attempts.
5. Once ESTA decides to accept the complaint for investigation, the complainant will be notified in writing of such determination within five calendar days. The complaint will receive a case number and will then be logged into ESTA's records identifying its basis and alleged harm, and the race, color, and national origin sex, age, genetic information, veteran status or retaliation of the complainant.
6. In cases where ESTA assumes the investigation of the complaint, ESTA will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have 10 calendar days from the date of ESTA's written notification of acceptance of the complaint to furnish his/her response to the allegations.
7. In cases where ESTA assumes the investigation of the complaint, within 40 calendar days of the acceptance of the complaint, ESTA's Transit Analyst will prepare an investigative report for review by the ESTA Board of Directors and the Executive Director. The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.
8. The investigative report and its findings will be sent to ESTA's Counsel for Review. After 10 days, Counsel will render a recommendation.
9. Any comments or recommendations from the Counsel will be reviewed by ESTA's Transit Analyst. The Transit Analyst will discuss the report and recommendations with the Executive Director within 10 calendar days. The report will be modified as needed and made final for its release.
10. ESTA's final investigative report and a copy of the complaint will be forwarded to the Federal Transit Administration, Region IX, within 60 calendar days of the acceptance of the complaint.
11. ESTA will notify the parties of its final decision.
12. If complainant is not satisfied with the results of the investigation of the alleged discrimination and practices the complainant will be advised of the right to appeal to the Federal Transit Administration, Office of Civil Rights Region IX, 201 Mission Street (Suite 1560) San Francisco, CA 94105. The complainant has 180 days after ESTA's final resolution to appeal to FTA. Unless the facts not previously considered come to light, reconsideration of appeal to ESTA will not be available.

## Eastern Sierra Transit Authority Title VI Complaint Form

### TITLE VI COMPLAINT FORM

|  |   |                                     |
|--|---|-------------------------------------|
| <b>Section I: Please write legibly</b>   |   |                                     |
| 1. Name:   |   |                                     |
| 2. Address:  |   |                                     |
| 3. Telephone:  | 3.a. Secondary Phone ( <i>Optional</i> ): |                                     |
| 4. Email Address:  |   |                                     |
| 5. Accessible Format Requirements?   | <input type="checkbox"/> Large Print      | <input type="checkbox"/> Audio Tape |
|  | <input type="checkbox"/> TDD              | <input type="checkbox"/> Other      |
| <b>Section II:</b>   |   |                                     |
| 6. Are you filing this complaint on your own behalf?   | YES*                                      | NO                                  |
| *If you answered "yes" to #6, go to Section III.   |   |                                     |
| 7. If you answered "no" to #6, what is the name of the person for whom you are filing this complaint? Name:  |   |                                     |
| 8. What is your relationship with this individual:   |   |                                     |
| 9. Please explain why you have filed for a third party:  |   |                                     |
| 10. Please confirm that you have obtained permission of the aggrieved party to file on their behalf.   | YES                                       | NO                                  |
| <b>Section III:</b>  |   |                                     |
| 11. I believe the discrimination I experienced was based on ( <i>check all that apply</i> ):   |   |                                     |
| <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin  |   |                                     |
| 12. Date of alleged discrimination: ( <i>mm/dd/yyyy</i> )  |   |                                     |
| 13. 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. If more space is needed, please use the back of this form. |   |                                     |

## Eastern Sierra Transit Authority Title VI Complaint Form, Page 2

|   |                        |        |
|---|------------------------|--------|
| <b>Section IV:</b>  |                        |        |
| 14. Have you previously filed a Title VI complaint with Eastern Sierra Transit Authority?   | YES                    | NO     |
| <b>Section V:</b>   |                        |        |
| 15. Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?<br>[ ] YES*    [ ] NO |                        |        |
| If yes, check all that apply:   |                        |        |
| [ ] Federal Agency _____  | [ ] State Agency _____ |        |
| [ ] Federal Court _____   | [ ] Local Agency _____ |        |
| [ ] State Court _____   |                        |        |
| 16. If you answered "yes" to #15, provide information about a contact person at the agency/court where the complaint was filed.             |                        |        |
| Name:   |                        |        |
| Title:  |                        |        |
| Agency:   |                        |        |
| Address:  |                        |        |
| Telephone:  |                        | Email: |
| <b>Section VI:</b>  |                        |        |
| Name of Transit Agency complaint is against:  |                        |        |
| Contact Person:   |                        |        |
| Telephone:  |                        |        |

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

Signature and date are required below to complete form:

Signature \_\_\_\_\_  
Date \_\_\_\_\_

**Submit form and any additional information to:**

Jill Batchelder, Transit Analyst  
EASTERN SIERRA TRANSIT AUTHORITY  
P.O. Box 1357  
Bishop, CA 93515  
Phone: 760.872.1901 x11  
Fax: 760.784-9566  
Email: jbatchelder@estransit.com

## List of Transit-Related Title VI Investigations, Complaints, and Lawsuits

| Type of Process | Date | Summary (including basis of complaint) | Status | Action(s) Taken |
|-----------------|------|--|--------|-----------------|
| Investigations  |      |  |        |                 |
| 1. none         |      |  |        |                 |
| 2.              |      |  |        |                 |
| Lawsuits        |      |  |        |                 |
| 1. none         |      |  |        |                 |
| 2.              |      |  |        |                 |
| Complaints      |      |  |        |                 |
| 1. none         |      |  |        |                 |
| 2.              |      |  |        |                 |

## **Public Participation Plan**

Eastern Sierra Transit Authority is committed to providing an open and visible decision-making process to which Inyo and Mono County residents have equal access. It is the policy of Eastern Sierra Transit Authority to actively solicit the involvement of citizens in the public decision-making process, through public notification, media exposure, local meetings, and public hearings.

Further, it is the policy of Eastern Sierra Transit Authority to offer early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions. This includes seeking out and considering the viewpoints of minority, low-income, and limited English proficiency (LEP) populations (as well as older adults and people with limited mobility) in the course of conducting public outreach activities, consistent with Federal Transit Administration (FTA) Circular 4702.1B (“Title VI Requirements and Guidelines for Federal Transit Administration Recipients”).

Attachment A – Public Participation Plan

## **Summary of Outreach Efforts Made Calendar Years 2014, 2015 & 2016**

Eastern Sierra Transit Authority is an active member in the Inyo County Social Service Transportation Advisory Committees and attends meetings annually. Unmet Needs Workshops are held annually in Bishop, the county’s population center, and in the southern section of the county.

In Mono County, Eastern Sierra Transit Authority is an active member in the Mono County Social Service Transportation Advisory Committees and attends meetings annually. Additionally, Eastern Sierra Transit is scheduled annually on the agenda of all Mono County Regional Planning Advisory Committee meetings that are held in Wheeler Crest, Antelope Valley, June Lake, Bridgeport, Crowley Lake, Lee Vining, Benton and Chalfant in order to solicit transportation needs directly from the community

Eastern Sierra Transit’s Board of Directors receive a semi-annual service review to determine if any service adjustments are needed. No fare increases or major service adjustments were made in calendar years 2014, 2015 or 2016.

**Outreach Activities**

The following is a list of outreach activities.

**2014 OUTREACH ACTIVITIES**

| <b>Date</b> | <b>Event</b>  |
|-------------|---|
| 02/26/14    | Inyo County Social Services Transportation Advisory Council   |
| 03/12/14    | Mono Basin RPAC   |
| 03/20/14    | Bridgeport RPAC   |
| 03/26/14    | Long Valley RPAC  |
| 04/01/14    | June Lake RPAC  |
| 04/03/14    | Antelope Valley RPAC  |
| 04/14/14    | Mono Social Services Transportation Advisory Council          |
| 04/16/14    | Inyo South County Unmet Needs                                 |
| 04/21/14    | Chalfant / Benton RPAC  |
| 05/21/14    | Inyo North County Unmet Needs                                 |
| 04/16/14    | Coordinated Plan Public Out Reach Meeting – Bishop, CA        |
| 04/16/14    | Coordinated Plan Public Out Reach Meeting – Mammoth Lakes, CA |

**2015 OUTREACH ACTIVITIES**

| <b>Date</b> | <b>Event</b>  |
|-------------|---|
| 02/23/15    | Inyo County Social Services Transportation Advisory Council |
| 03/02/15    | Chalfant RPAC   |
| 03/05/15    | Antelope Valley RPAC  |

|          |   |
|----------|---|
| 03/11/15 | Mono Basin RPAC   |
| 03/16/15 | Benton/Hammil RPAC  |
| 03/19/15 | Bridgeport RPAC   |
| 03/25/15 | Long Valley RPAC  |
| 04/13/15 | Mono County Social Services Transportation Advisory Council |

### 2016 OUTREACH ACTIVITIES

| Date     | Event   |
|----------|---|
| 02/22/16 | Chalfant RPAC   |
| 02/25/16 | Inyo County Social Services Transportation Advisory Council |
| 02/29/16 | Benton/Hammil RPAC  |
| 03/03/16 | Antelope Valley RPAC  |
| 03/09/16 | Mono Basin RPAC   |
| 03/22/16 | Bridgeport RPAC   |
| 03/23/16 | Long Valley RPAC  |

All public meeting and workshops are widely notice through multiple media outlets in the community in both English and Spanish.

## Language Assistance Plan

The Limited English Proficiency Plan has been prepared to address Eastern Sierra Transit Authority's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 200d, et seq., and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each 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 Eastern Sierra Transit Authority, which receives Federal grant funds.

Attachment B - Limited English Proficiency Plan

## Membership of Non-Elected Committees and Councils

Eastern Sierra Transit Authority's Board of Director's is made up of eight officials from each of the member entities; City of Bishop, Town of Mammoth Lakes, Inyo County and Mono County. Seven of the eight current Directors are elected officials. One Director was appointed from the public at large in keeping with Section 1.2.2 of the ESTA Joint Powers Agreement.

## Service Standards

FTA requires all fixed route transit providers of public transportation to develop quantitative standards for the following indicators: vehicle load, vehicle headway, on-time performance and service availability.

### 1. Vehicle Load Standards

The average of all loads during the peak operating period should not exceed the vehicles' achievable capacities. As defined below.

| Vehicle Type | Average Passenger Capacities |          |       | Maximum Load Factor |
|--------------|------------------------------|----------|-------|---------------------|
|              | Seated                       | Standing | Total |                     |
| 22' Mini-Bus | 15                           | 0        | 15    | 1.0                 |
| 25' Mini-Bus | 18                           | 0        | 18    | 1.0                 |
| 33' Trolley  | 33                           | 9        | 42    | 1.27                |
| 35' bus      | 37                           | 14       | 51    | 1.38                |
| 40" bus      | 37                           | 21       | 58    | 1.57                |

## 2. Vehicle Headway Standards

Scheduling involves the consideration of a number of factors including: ridership productivity, transit/pedestrian friendly streets, density of transit-dependent populations and activities, relationship to the Town of Mammoth Lakes Transportation Plan, relationship to major transportation developments and land use connectivity and transportation demand.

| Winter/Summer Peak Season | Peak | Base | Evening | Night |
|---------------------------|------|------|---------|-------|
| Red's Meadow Shuttle      | 10   | 20   | 45      | --    |
| Ski Area Routes           | 10   | 15   | --      | --    |
| Lakes Basin Trolley       | 15   | 30   | --      | --    |
| Trolley                   | 20   | 20   | 20      | 20    |
| Town Routes               | 30   | 30   | --      | --    |

| Spring /Fall Off Season | Peak | Base | Evening | Night |
|-------------------------|------|------|---------|-------|
| Trolley                 | 30   | 30   | 30      | --    |
| Town Routes             | 30   | 30   | --      | --    |

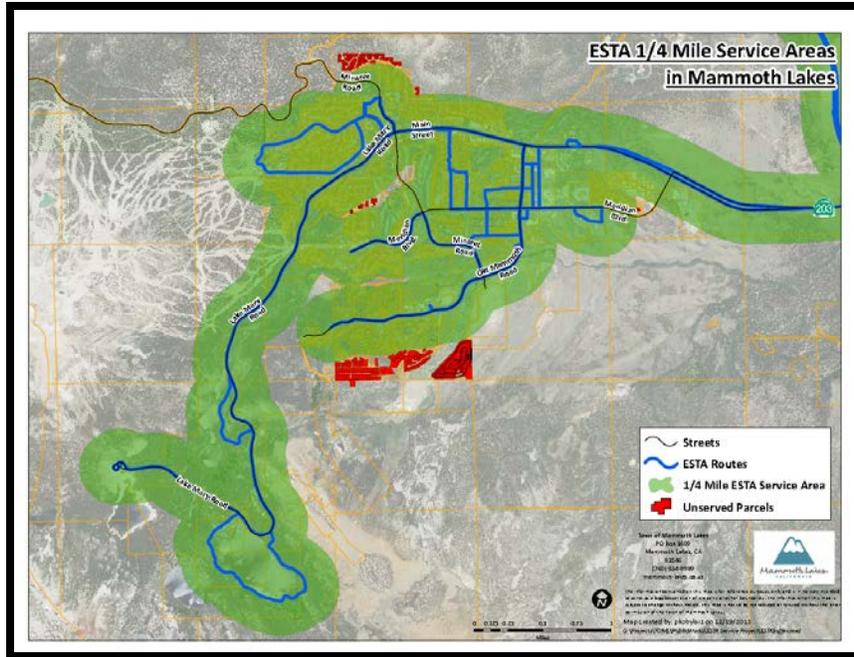
## 3. On-Time Performance

A vehicle is considered on time if it arrives at a scheduled time point no more than 5 minutes late and the vehicle may not depart prior to the schedule time. Eastern Sierra Transit's on-time performance objective is 95% or greater on a particular route. On-time performance is periodically sampled to monitor performance

## 4. Service Availability

The standard set by Eastern Sierra Transit for service availability is to serve 80% of the community within ¼ of a mile either side of the fixed route.

Eastern Sierra Transit utilized intersecting census blocks when calculating the population served by the fixed routes. At this time, fixed route service is only offered in the Town of Mammoth Lakes. The total population in the Town based on the 2010 census Blocks is 8,205. The population served by the fixed route is 8,100. This calculates to 98.7% of the population that is within ¼ mile of a fixed route.



See Attachment C for the Census Block populations.

## 5. Vehicle Assignment Policy

Vehicle assignments are first based on funding source requirements. Eastern Sierra Transit's 35' and 40' vehicles were purchased with FTA Transit in the Parks Section 5320 funding that intends that these vehicles to be operated on routes to and from federal lands.

After funding requirements are satisfied, bus assignments take into account the operating characteristics of the buses of the various lengths, which are matched to the operating characteristics of the route. Additionally, the carrying capacity of the vehicle is matched with the ridership volume of the route.

The Vehicle/Capital Replacement Policy for each of the routes allows for all vehicles to be replaced when they reach their useful life in years and /or miles.

## 6. Transit Amenities Policy

Eastern Sierra Transit Authority coordinates with the local and state jurisdictions on transit amenities in the fixed route area. All agencies work together in ensure compliance with Title VI of the Civil Rights Act of 1964.

## **Board of Directors Approval of Eastern Sierra Transit Authority's Title VI Program**

**Attach Board Resolution**

## Appendices

# Eastern Sierra Transit Authority's Public Participation Plan

**Approved:**

## Table of Contents

|   |    |
|---|----|
| Introduction  | 20 |
| Public Participation Process  | 20 |
| Approach to Public Participation  | 21 |
| Targeted Public Outreach to Minority and Limited English Proficient (LEP) Populations | 21 |
| Outreach Requirements and Activities  | 22 |

# 1. Introduction

Eastern Sierra Transit Authority is committed to providing an open and visible decision-making process to which Inyo and Mono County residents have equal access. It is the policy of Eastern Sierra Transit Authority to actively solicit the involvement of citizens in the public decision-making process, through public notification, media exposure, local meetings, and public hearings.

Further, it is the policy of Eastern Sierra Transit Authority to offer early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions. This includes seeking out and considering the viewpoints of minority, low-income, limited English proficiency (LEP) populations, older adults, and persons with limited mobility in the course of conducting public outreach activities, consistent with Federal Transit Administration (FTA) Circular 4702.1B (“Title VI Requirements and Guidelines for Federal Transit Administration Recipients”).

# 2. Public Participation Process

## Public Involvement Plan

When Eastern Sierra Transit has a project, program or issue that may have an identifiable impact on a neighborhood or citizen group, a Public Involvement Plan shall be submitted to the Executive Director at the beginning of the project or program. The Plan shall be designed to:

1. Ensure responsiveness to the level of interest and concern expressed by the public;
2. Ensure visibility and understanding by the agencies, groups and individuals who may participate; and
3. Ensure that public involvement is carefully and systematically included as part of the decision-making process.

The Public Involvement Plan will be included as part of staff reports for Eastern Sierra transit’s Board of Directors.

## **Approach to Public Participation**

The following principles will be used to develop the Public Involvement Plan for transit projects and programs:

- When a project (e.g., construction activity) may affect a community, special community meetings will be scheduled early in the project planning process. Notices will be sent to organized community groups and any individual who has requested notification.
- All public hearing notices shall be written in clear, concise and understandable language and will incorporate graphics when it aids the message. The notices will clearly be identified as an Eastern Sierra Transit notice.
- The Public Involvement Plan will reflect Eastern Sierra Transit's policy to provide early and continuous opportunities for the public to be involved in the identification of the impacts of proposed decisions. It will also reflect the Transit Authority's policy to seek out the viewpoints of minority, low-income, and Limited English Proficiency (LEP) populations, as well as older adults and people with limited mobility, in the course of conducting public outreach and involvement activities, consistent with the Authority's Title VI Program, Executive Order 13166 on access for individuals with Limited English Proficiency, and U.S. Department of Transportation (DOT) LEP Guidance.
- The Public Involvement Plan will be tailored to the populations affected and the type of plan, program, or service under consideration.
- Public meetings will be held in locations that are accessible to transit riders and people with disabilities, and will be scheduled at times that are convenient for members of the public.
- Public meetings and hearings will be broadly advertised in the community in both English and Spanish (e.g., website [www.estransit.com](http://www.estransit.com), local print media, social media, and email notification to Eastern Sierra Transit's outreach mailing list) and notification will be provided regarding the availability of language assistance.

## **Targeted Public Outreach to Minority and Limited English Proficient (LEP) Populations**

During development of the Public Involvement Plan and/or planning for public engagement in general, the Eastern Sierra Transit Authority will incorporate strategies intended to promote involvement of minority and LEP individuals in public participation activities, as appropriate for the plan, project, or service in question, and consistent with federal Title VI regulations, Executive Order 13166 on Limited English Proficiency, and the U.S. Department of Transportation LEP Guidance.

At a minimum, staff will implement the strategies identified in the section below, *Outreach Requirements and Activities*, including holding public meetings in locations that are accessible to transit riders and people with disabilities, scheduling meetings at times that are convenient for members of the public, advertising meetings and hearings in English and Spanish, and providing notice of the availability of language assistance.

In addition, Eastern Sierra Transit staff will consider implementing the following public engagement strategies to complement the minimum requirements, as appropriate to the plan, project, or service:

- Using supplemental outreach strategies such as surveys regarding projects or proposed service changes.
- Partnering with community organizations to engage members of the public who are less likely to attend traditional public meetings (including LEP populations) through means such as surveys and focus groups. Eastern Sierra Transit maintains a list of current and potential future community partners.
- Attending community events and meetings of neighborhood associations, faith-based organizations, advocacy groups, and other groups to solicit feedback from diverse members of the public.

Eastern Sierra Transit staff may consult FTA Circular 4703.1 (“Environmental Justice Policy Guidelines for Federal Transit Administration Recipients”) for additional strategies that may be incorporated into the Public Involvement Plan.

## **Outreach Requirements and Activities**

### **Public Comment for Fare Increases and Major Service Changes**

It is the policy of Eastern Sierra Transit to solicit public opinion and consider public comment before raising fares or implementing a major service change.

A public hearing is required prior to implementation of a fare increase or a major service change. A “major” service change is defined as a modification that affects 25% or more of a single route, or 25% or more of all routes. Additional public involvement strategies, such as public meetings, community meetings, or other outreach to affected individuals will be implemented as appropriate to solicit public comment for consideration in advance of the public hearing. Public comments received will be compiled and considered prior to finalizing the recommendation to the Board of Director’s regarding a fare increase or major service change. A summary of the public comments received will be provided as part of the staff report submitted to the Board of Director’s for the fare increase or major service reduction in question.

The public hearing will be scheduled as part of a regular Board of Director’s meeting, and advertised broadly through the Eastern Sierra Transit website [www.estransit.com](http://www.estransit.com), outreach mailing lists, and poster and flyers on the buses, and at bus stops. The hearing will also be advertised through targeted outreach to community groups or other organizations and individuals, as appropriate to the proposed change. Notices regarding the public hearing will be provided in both English and Spanish. Additionally, notice of the public hearing will be posted in the Inyo Register and/or Mammoth Times as appropriate.

Any interested individual is invited to make comments. Comments may be submitted in person at the public informational meetings and public hearings. They may also be submitted by mail, over the phone to Eastern Sierra Transit administrative staff, via email, and online via the Eastern Sierra Transit website.

The public hearing will consist of a staff report before the Board of Director's, followed by public testimony.

All comments received are reviewed by Eastern Sierra Transit staff and the Board of Directors and will be considered in the final decisions. The goal of the Eastern Sierra Transit Authority is to provide consistently excellent transit services to meet the needs of the region's diverse population including residents and visitors, young and old, and transit-dependent and choice riders.

# **Eastern Sierra Transit Authority's Language Assistance Plan**

**Approved:**

## Table of Contents

|                                     |    |
|-------------------------------------|----|
| Introduction                        | 26 |
| Plan Summary                        | 26 |
| Results of the Four Factor Analysis | 27 |
| Factor 1                            | 27 |
| Factor 2                            | 27 |
| Factor 3                            | 27 |
| Factor 4                            | 28 |
| Implementation Plan                 | 29 |
| Language Assistance Measures        | 29 |
| Staff Training                      | 29 |
| Outreach Techniques                 | 29 |
| Monitoring                          | 30 |
| Dissemination                       | 30 |
| Appendix                            | 31 |

## **I. Introduction**

The Language Assistance Plan for Persons with Limited English Proficiency has been prepared to address Eastern Sierra Transit Authority's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 200d, et seq., and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each 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 Eastern Sierra Transit Authority, which receives Federal grant funds.

## **II. Plan Summary**

Eastern Sierra Transit Authority is the operator of public transit in Inyo and Mono Counties, providing dial-a-ride, fixed route, commuter routes and inter-regional bus service. Eastern Sierra Transit Authority has developed this Language Assistance Plan for Persons with Limited English Proficiency to help identify reasonable steps for providing language assistance to persons who wish to access services provided. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, Eastern Sierra Transit used the 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 by Eastern Sierra Transit.
2. The frequency with which LEP persons come in contact with Eastern Sierra Transit services.

3. The nature and importance of services provided by Eastern Sierra Transit to the LEP population.
4. The interpretation services available to Eastern Sierra Transit and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section

### **III. Meaningful Access: Four-Factor Analysis**

#### **Factor 1**

##### **The Number or proportion of LEP persons in the service area who may be served or are likely to require Eastern Sierra Transit Services**

Eastern Sierra Transit staff reviewed the U.S. Census Report B16001 Language Spoken at Home By Ability To Speak English For the Population 5 Years and Over and determined that 5,748 persons in the Eastern Sierra Transit service area or (18.7%) of the population speak a language other the English. Of those, 2,294 persons have limited English proficiency; that is they speak English less than “very well” This is 7.5% of the overall population in the service area. Of those persons with limited English proficiency in Eastern Sierra Transit’s service area, 2,047 (6.7%) speak Spanish or Spanish Creole. No other languages account for more than 5% of the total population.

Appendix A – Census Data

#### **Factor 2**

##### **The frequency with which LEP persons come in contact with Eastern Sierra Transit Services**

Eastern Sierra Transit staff reviewed the frequency with which the Board of Directors, office/dispatch staff and drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. Since the inception of the Authority in 2007, Eastern Sierra Transit has had no requests for interpreters and no request for translated program documents.

#### **Factor 3**

##### **The Nature and Importance of Services Provided by Eastern Sierra Transit to the LEP Population**

There is no large geographic concentration of any type of LEP individuals in the service area of Eastern Sierra Transit. The overwhelming majority of the population, 92.5%, speaks only English or speaks English very well. As a result, there are few service, professional and leadership organizations within Eastern Sierra Transit’s service area

that focus on outreach to LEP individuals. The Eastern Sierra Transit Board of Directors, office/dispatch staff and drivers are most likely to encounter LEP individuals through transit rides, office visits, phone conversations, and interactions at Board meetings.

## Factor 4

### The resources available to Eastern Sierra Transit and overall cost to provide LEP assistance.

Eastern Sierra Transit reviewed available resources that could be used for providing LEP assistance. Authority documents will be translated if the need should arise and reasonable notice given. Other language translation if needed would be provided through a telephone interpreter line. Eastern Sierra Transit would pay the fee for this service.

How Eastern Sierra Transit staff will identify LEP persons who need language assistance:

1. Post notice of Language Assistance Plan and the availability of interpretation or translation services free of charge in a language that LEP persons would understand.
2. All Eastern Sierra Transit staff will be provided with “I Speak” cards to assist in identifying the language interpretation needed if the occasion arises.
3. Eastern Sierra Transit staff will be surveyed annually on their experience concerning any contacts with LEP persons during the previous year.
4. When Eastern Sierra Transit sponsors a public hearing, meeting or workshop, the public notice will include a statement that interpreter services are available with seven day advance notice. Additionally, staff person will make an effort to identify any LEP persons at public meetings by informally engaging participants in conversation it is possible to gauge each attendee’s ability to speak and understand English. Although translation may not be available to be provided at the event, it will help identify the need for such services at future events.

| Specific Element              | Cost                       | Estimated Annual Cost |
|-------------------------------|----------------------------|-----------------------|
| Title VI Notice to the Public | \$300                      | \$300                 |
| Vital Document translation    | \$100 minimum per document | \$2,000               |
| “I Speak” cards               | \$100 per 50 cards         | \$200                 |
| Interpretive services         | \$100 per hour             | \$2,300               |

|                           |                   |       |
|---------------------------|-------------------|-------|
| Phone translation service | \$3.95 per minute | \$200 |
|                           |                   |       |

## IV. Implementation Plan

### Language Assistance Measures

Although there are a very low percentage of LEP individuals in the service area who speak English “not well” or “not at all”, Eastern Sierra Transit will offer the following measures:

1. Staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English.
2. The following resources will be available to accommodate LEP persons:
  - a. A list of volunteer Spanish Language interpreters will be maintained and will be provided within a reasonable time period.
  - b. Language interpretation will be accessed for all languages through a telephone interpretation service for critical need situations.
3. Network with local human service organizations that provide services to LEP individuals and seek opportunities to provide information about the transit program and services.
4. Include “Spanish a plus” on all Eastern Sierra Transit job recruitment notices.
5. Continue to provide a phone tree at Eastern Sierra Transit’s headquarters in Bishop that includes Spanish options.
6. Maintain Eastern Sierra Transit’s website ([www.estransit.com](http://www.estransit.com)) that includes an option for translation into multiple languages.

### Staff Training

The following training will be provided to Eastern Sierra Transit Staff:

1. Information on the Eastern Sierra Transit Title VI procedures and LEP responsibilities
2. Description of language assistance services offered to the public
3. Use of “I Speak Cards”
4. Documentation of language assistance requests
5. How to handle a Potential Title VI / LEP complaint

### Outreach Techniques

When staff prepares a document or schedules a meeting for which the target audience is expected to include LEP individuals, the documents, meeting notices, flyers, and

agendas will be printed in an alternative language based on the known LEP population. Interpreters will be available as requested.

## **Monitoring**

Eastern Sierra Transit will update the Language Assistance Plan as required. At a minimum, the plan will be reviewed and updated when data for the US Census is updated or when it is clear that higher concentrations of LEP individuals are present in the service area. Updates will include the following:

1. The number of contacts with documented LEP person encountered annually.
2. How the needs of LEP persons have been addressed.
3. Determination of the current LEP population in the service area.
4. Determination as to whether the need for translation services has changed
5. Determine whether local language assistance programs have been effective and sufficient to meet the need.
6. Determine whether Eastern Sierra Transit's financial resources are sufficient to fund language assistance resources needed.
7. Determine whether the Eastern Sierra Transit fully complies with the goals of this Language Assistance Plan.
8. Determine whether complaints have been received concerning the failure to meet the needs of LEP individuals
9. Maintain a Title VI complaint log, to include LEP issues and basis of complaints.

## **Dissemination of the Eastern Sierra Transit Authority Language Assistance Plan**

A link to the Eastern Sierra Transit Language Assistance Plan and the Title VI Procedures is on the agency's website at [www.estransit.com](http://www.estransit.com) .

Any person or agency may request a copy of the plan via telephone, fax, mail, or in person and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation.

Questions or comment regarding the Language Assistance Plan may be submitted to Eastern Sierra Transit's, Transit Analyst:

Jill Batchelder, Transit Analyst  
Eastern Sierra Transit Authority  
PO Box 1357

Bishop, CA 93515

Phone: 760-872-1901 Ext. 11

Fax: 760-784-3566

Email: [jbatchelder@estransit.com](mailto:jbatchelder@estransit.com)

# Appendix

B16+A1:G55001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER - Universe: Population 5 years and over

2010-2014 American Community Survey 5-Year Estimates

|                                     | Inyo County | Mono County | Inyo / Mono Total |         |
|-------------------------------------|-------------|-------------|-------------------|---------|
|                                     | Estimate    | Estimate    | Estimate          | Percent |
| <b>Total:</b>                       | 17,336      | 13,351      | 30687             | 100.0%  |
| Speak only English                  | 14,866      | 10,073      | 24939             | 81.3%   |
| Spanish or Spanish Creole:          | 2,134       | 2,895       | 5029              | 16.4%   |
| Speak English "very well"           | 1,420       | 1,562       | 2982              | 9.7%    |
| Speak English less than "very well" | 714         | 1,333       | 2047              | 6.7%    |
| French (incl. Patois, Cajun):       | 2           | 0           | 2                 | 0.0%    |
| Speak English "very well"           | 2           | 0           | 2                 | 0.0%    |
| Speak English less than "very well" | 0           | 0           | 0                 | 0.0%    |
| French Creole:                      | 0           | 1           | 1                 | 0.0%    |
| Speak English "very well"           | 0           | 1           | 1                 | 0.0%    |
| Speak English less than "very well" | 0           | 0           | 0                 | 0.0%    |
| Italian:                            | 3           | 13          | 16                | 0.1%    |
| Speak English "very well"           | 3           | 13          | 16                | 0.1%    |
| Speak English less than "very well" | 0           | 0           | 0                 | 0.0%    |
| Portuguese or Portuguese Creole:    | 4           | 55          | 59                | 0.2%    |
| Speak English "very well"           | 4           | 55          | 59                | 0.2%    |
| Speak English less than "very well" | 0           | 0           | 0                 | 0.0%    |
| German:                             | 13          | 120         | 133               | 0.4%    |
| Speak English "very well"           | 13          | 82          | 95                | 0.3%    |
| Speak English less than "very well" | 0           | 38          | 38                | 0.1%    |
| Yiddish:                            | 0           | 0           | 0                 | 0.0%    |
| Speak English "very well"           | 0           | 0           | 0                 | 0.0%    |
| Speak English less than "very well" | 0           | 0           | 0                 | 0.0%    |
| Other West Germanic languages:      | 20          | 19          | 39                | 0.1%    |
| Speak English "very well"           | 0           | 19          | 19                | 0.1%    |
| Speak English less than "very well" | 20          | 0           | 20                | 0.1%    |
| Scandinavian languages:             | 4           | 0           | 4                 | 0.0%    |
| Speak English "very well"           | 4           | 0           | 4                 | 0.0%    |
| Speak English less than "very well" | 0           | 0           | 0                 | 0.0%    |
| Greek:                              | 0           | 0           | 0                 | 0.0%    |
| Speak English "very well"           | 0           | 0           | 0                 | 0.0%    |
| Speak English less than "very well" | 0           | 0           | 0                 | 0.0%    |
| Russian:                            | 0           | 0           | 0                 | 0.0%    |
| Speak English "very well"           | 0           | 0           | 0                 | 0.0%    |
| Speak English less than "very well" | 0           | 0           | 0                 | 0.0%    |
| Polish:                             | 0           | 0           | 0                 | 0.0%    |
| Speak English "very well"           | 0           | 0           | 0                 | 0.0%    |
| Speak English less than "very well" | 0           | 0           | 0                 | 0.0%    |
| Serbo-Croatian:                     | 16          | 0           | 16                | 0.1%    |
| Speak English "very well"           | 5           | 0           | 5                 | 0.0%    |
| Speak English less than "very well" | 11          | 0           | 11                | 0.0%    |
| Other Slavic languages:             | 0           | 0           | 0                 | 0.0%    |
| Speak English "very well"           | 0           | 0           | 0                 | 0.0%    |
| Speak English less than "very well" | 0           | 0           | 0                 | 0.0%    |
| Armenian:                           | 0           | 0           | 0                 | 0.0%    |
| Speak English "very well"           | 0           | 0           | 0                 | 0.0%    |
| Speak English less than "very well" | 0           | 0           | 0                 | 0.0%    |
| Persian:                            | 5           | 0           | 5                 | 0.0%    |
| Speak English "very well"           | 1           | 0           | 1                 | 0.0%    |
| Speak English less than "very well" | 4           | 0           | 4                 | 0.0%    |

|  |    |     |     |      |
|--|----|-----|-----|------|
| Gujarati:                              | 0  | 0   | 0   | 0.0% |
| Speak English "very well"              | 0  | 0   | 0   | 0.0% |
| Speak English less than "very well"    | 0  | 0   | 0   | 0.0% |
| Hindi:                                 | 11 | 0   | 11  | 0.0% |
| Speak English "very well"              | 11 | 0   | 11  | 0.0% |
| Speak English less than "very well"    | 0  | 0   | 0   | 0.0% |
| Urdu:                                  | 0  | 0   | 0   | 0.0% |
| Speak English "very well"              | 0  | 0   | 0   | 0.0% |
| Speak English less than "very well"    | 0  | 0   | 0   | 0.0% |
| Other Indic languages:                 | 18 | 0   | 18  | 0.1% |
| Speak English "very well"              | 14 | 0   | 14  | 0.0% |
| Speak English less than "very well"    | 4  | 0   | 4   | 0.0% |
| Other Indo-European languages:         | 0  | 0   | 0   | 0.0% |
| Speak English "very well"              | 0  | 0   | 0   | 0.0% |
| Speak English less than "very well"    | 0  | 0   | 0   | 0.0% |
| Chinese:                               | 59 | 37  | 96  | 0.3% |
| Speak English "very well"              | 24 | 2   | 26  | 0.1% |
| Speak English less than "very well"    | 35 | 35  | 70  | 0.2% |
| Japanese:                              | 5  | 0   | 5   | 0.0% |
| Speak English "very well"              | 1  | 0   | 1   | 0.0% |
| Speak English less than "very well"    | 4  | 0   | 4   | 0.0% |
| Korean:                                | 43 | 0   | 43  | 0.1% |
| Speak English "very well"              | 13 | 0   | 13  | 0.0% |
| Speak English less than "very well"    | 30 | 0   | 30  | 0.1% |
| Mon-Khmer, Cambodian:                  | 0  | 0   | 0   | 0.0% |
| Speak English "very well"              | 0  | 0   | 0   | 0.0% |
| Speak English less than "very well"    | 0  | 0   | 0   | 0.0% |
| Hmong:                                 | 0  | 0   | 0   | 0.0% |
| Speak English "very well"              | 0  | 0   | 0   | 0.0% |
| Speak English less than "very well"    | 0  | 0   | 0   | 0.0% |
| Thai:                                  | 0  | 0   | 0   | 0.0% |
| Speak English "very well"              | 0  | 0   | 0   | 0.0% |
| Speak English less than "very well"    | 0  | 0   | 0   | 0.0% |
| Laotian:                               | 0  | 0   | 0   | 0.0% |
| Speak English "very well"              | 0  | 0   | 0   | 0.0% |
| Speak English less than "very well"    | 0  | 0   | 0   | 0.0% |
| Vietnamese:                            | 6  | 1   | 7   | 0.0% |
| Speak English "very well"              | 4  | 0   | 4   | 0.0% |
| Speak English less than "very well"    | 2  | 1   | 3   | 0.0% |
| Other Asian languages:                 | 12 | 0   | 12  | 0.0% |
| Speak English "very well"              | 0  | 0   | 0   | 0.0% |
| Speak English less than "very well"    | 12 | 0   | 12  | 0.0% |
| Tagalog:                               | 10 | 127 | 137 | 0.4% |
| Speak English "very well"              | 8  | 127 | 135 | 0.4% |
| Speak English less than "very well"    | 2  | 0   | 2   | 0.0% |
| Other Pacific Island languages:        | 4  | 5   | 9   | 0.0% |
| Speak English "very well"              | 3  | 5   | 8   | 0.0% |
| Speak English less than "very well"    | 1  | 0   | 1   | 0.0% |
| Navajo:                                | 10 | 0   | 10  | 0.0% |
| Speak English "very well"              | 7  | 0   | 7   | 0.0% |
| Speak English less than "very well"    | 3  | 0   | 3   | 0.0% |
| Other Native North American languages: | 77 | 5   | 82  | 0.3% |
| Speak English "very well"              | 32 | 5   | 37  | 0.1% |
| Speak English less than "very well"    | 45 | 0   | 45  | 0.1% |
| Hungarian:                             | 8  | 0   | 8   | 0.0% |
| Speak English "very well"              | 8  | 0   | 8   | 0.0% |
| Speak English less than "very well"    | 0  | 0   | 0   | 0.0% |
| Arabic:                                | 0  | 0   | 0   | 0.0% |

|                                     |   |   |   |      |
|-------------------------------------|---|---|---|------|
| Speak English "very well"           | 0 | 0 | 0 | 0.0% |
| Speak English less than "very well" | 0 | 0 | 0 | 0.0% |
| Hebrew:                             | 0 | 0 | 0 | 0.0% |
| Speak English "very well"           | 0 | 0 | 0 | 0.0% |
| Speak English less than "very well" | 0 | 0 | 0 | 0.0% |
| African languages:                  | 0 | 0 | 0 | 0.0% |
| Speak English "very well"           | 0 | 0 | 0 | 0.0% |
| Speak English less than "very well" | 0 | 0 | 0 | 0.0% |
| Other and unspecified languages:    | 6 | 0 | 6 | 0.0% |
| Speak English "very well"           | 6 | 0 | 6 | 0.0% |
| Speak English less than "very well" | 0 | 0 | 0 | 0.0% |

|                                     |       |       |       |        |
|-------------------------------------|-------|-------|-------|--------|
| Speak only English                  | 14866 | 10073 | 24939 | 81.3%  |
| Speak English "very well"           | 1583  | 1871  | 3454  | 11.3%  |
| Speak English less than "very well" | 887   | 1407  | 2294  | 7.5%   |
|                                     |       |       |       | 100.0% |

|                                     |       |       |       |      |
|-------------------------------------|-------|-------|-------|------|
| Speak a language other than English | 2,470 | 3,278 | 5,748 | 0.0% |
|-------------------------------------|-------|-------|-------|------|