

Mendocino Council of Governments

Title VI Program
&
Limited English Proficiency Plan

2026





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Mendocino Council of Governments Title VI Program

Introduction:

Mendocino Council of Governments (MCOG) was formed in 1972, as mandated by the Transportation Development Act (TDA). MCOG is a political subdivision of the State of California.

MCOG is a Joint Powers Agency comprised of the unincorporated County of Mendocino and the incorporated cities of Fort Bragg, Point Arena, Ukiah, and Willits. 2026 California Department of Finance population figures place Mendocino County population at 88,591. This figure includes an unincorporated population of 60,061, and an incorporated population of Ukiah (16,138), Fort Bragg (7,142), Willits (4,800), and Point Arena (450). The bulk of the population in Mendocino County is concentrated in a few areas. Ukiah, Talmage, and Redwood Valley make up the largest single population concentration. Fort Bragg and the coastal area southward to the Navarro River is another population center. Willits, the surrounding Little Lake Valley, and the Brooktrails subdivision is the only other large settlement area in the County. Much of the rest of Mendocino County is rural and undeveloped.

Acting as the Regional Transportation Planning Agency (RTPA), MCOG disburses state and federal funds for transportation and provides regional transportation planning services. MCOG is responsible for preparing the Regional Transportation Plan, and funded projects are to be consistent with the Plan. Projects involve planning, capital improvements, rehabilitation and maintenance, public transit fleet replacement, and multi-modal facilities.

In addition to the RTPA, MCOG also serves as the Service Authority for Freeway Emergencies (SAFE) of Mendocino County, administering the call box program since 1994. MCOG also is involved with housing and economic development.

Plan Statement:

The following program was developed to guide MCOG in its administration and management of Title VI-related activities, and details how MCOG meets the requirements as set forth in FTA Circular 4702.1B.

Section 601 under Title VI of the Civil Rights Act of 1964 states the following:

“No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

Policy:

MCOG is committed to ensuring that no person on the basis of race, color, or national origin will be excluded from participation or subjected to discrimination in the level and quality of services or related benefits provided by MCOG's employees, affiliates, and contractors.



Governing Board:

The MCOG Board of Directors is comprised of seven members: two members of the County Board of Supervisors, one member from each of the four city councils, and one countywide representative appointed by the Board of Supervisors.

General Reporting Requirements:

Chapter III of FTA Circular 4702.1B addresses the general reporting requirements for recipients and sub-recipients of Federal Transit Administration (FTA) funding to ensure that their activities comply with DOT Title VI regulations. Below are summaries of each requirement and how MCOG's Title VI Program fulfills that requirement.

1. REQUIREMENT TO PROVIDE TITLE VI ASSURANCES.

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT's Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances to FTA.

MCOG submits its Certifications and Assurances to Caltrans when they receive a grant.

2. REQUIREMENT TO PREPARE AND SUBMIT A TITLE VI PROGRAM.

FTA requires that all direct and primary recipients document their compliance with DOT's Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years or as otherwise directed by FTA. For all recipients (including sub-recipients), the Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. Sub-recipients shall submit Title VI Programs to the primary recipient from whom they receive funding in order to assist the primary recipient in its compliance efforts.

MCOG's Board of Directors will approve this Title VI Program by resolution. The effective date will be the date of the resolution.

3. REQUIREMENT TO NOTIFY BENEFICIARIES OF PROTECTION UNDER TITLE VI

The Title VI Program shall include recipient's Title VI notice to the public that indicates the recipient complies with Title VI, and informs members of the public of the protections against discrimination afforded to them by Title VI. Include a list of locations where the notice is posted.

MCOG has developed a public Title VI Notice to Beneficiaries following the guidelines of Circular FTA C 4702.1B, Appendix B. A copy of this notice is found in Appendix A of this Title VI Program. The notice is displayed in MCOG's office and on the following website:

<http://www.mendocinocog.org/>.



4. REQUIREMENT TO HAVE TITLE VI COMPLAINT PROCEDURES AND A COMPLAINT FORM

All recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form, and the form and procedure for filing a complaint shall be available on the recipient's website.

MCOG has developed a Title VI complaint procedure and form. In this Title VI Program, Appendix B outlines the Title VI Complaint Procedures, and Appendix C is a copy of the Title VI Complaint form.

The complaint procedures and form are available in English and Spanish in the MCOG office and on their website, <http://www.mendocinocog.org/>. Individuals who do not have access to the internet may request that MCOG mail them a paper copy of the procedures and form.

5. REQUIREMENT TO RECORD AND REPORT TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

In order to comply with the reporting requirements of 49 CFR Section 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint.

MCOG will maintain a list of all investigations, lawsuits and complaints naming MCOG according to the guidelines of Circular FTA C 4702.1B, Appendix E. A copy of this list is provided in Appendix D of this Title VI Program. In addition, MCOG will maintain permanent records of all related documents. MCOG has not received any Title VI complaints of discrimination and therefore does not have any investigations or lawsuits to report, however the processes are in place in the instance that complaints are made.

6. REQUIREMENT TO PROMOTE INCLUSIVE PUBLIC PARTICIPATION

The content and considerations of Title VI, the Executive Order on LEP, and the DOT LEP Guidance shall be integrated into each recipient's established public participation plan or process (i.e., the document that explicitly describes the proactive strategies, procedures, and desired outcomes that underpin the recipient's public participation activities).

MCOG's current public participation plan, adopted in 2020, is shown in Appendix E of this Title VI Program. MCOG ensures that minority and LEP populations, as with all members of society, will be empowered to participate in MCOG sponsored activities.



7. REQUIREMENT TO PROVIDE MEANINGFUL ACCESS TO LEP PERSONS.

Consistent with Title VI of the Civil Rights Act of 1964, DOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000), recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English proficient (LEP).

Please see MCOG's Limited English Proficiency Plan attached to this Title VI Program. MCOG's Four Factor Analysis and action plan are contained therein.

8. MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES.

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program." Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

MCOG does not have a non-elected board or advisory council.

9. REQUIREMENT TO PROVIDE ASSISTANCE TO SUBRECIPIENTS

Title 49 CFR Section 21.9(b) states that if "a primary recipient extends Federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligations under this part." Primary recipients should assist their subrecipients in complying with DOT's Title VI regulations, including the general reporting requirements. Assistance shall be provided to the subrecipient as necessary and appropriate by the primary recipient.

Caltrans only.

10. REQUIREMENT TO MONITOR SUBRECIPIENTS

In accordance with 49 CFR 21.9(b), and to ensure that subrecipients are complying with the DOT Title VI regulations, primary recipients must monitor their subrecipients for compliance with the regulations. Importantly, if a subrecipient is not in compliance with Title VI requirements, then the primary recipient is also not in compliance.

Caltrans only.



11. DETERMINATION OF SITE OR LOCATION OF FACILITIES.

Title 49 CFR Section 21.9(b)(3) states, "In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part." Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, "The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin." For the purposes of this requirement, "facilities" does not include bus shelters, as these are transit amenities and are covered in Chapter IV, nor does it include transit stations, power substations, etc. as those are evaluated during project development and the NEPA process. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.

MCOG does not construct transit facilities.

12. REQUIREMENT TO PROVIDE ADDITIONAL INFORMATION UPON REQUEST.

FTA may request, at its discretion, information other than that required by this Circular from a recipient in order for FTA to investigate complaints of discrimination or to resolve concerns about possible noncompliance with DOT's Title VI regulations.

MCOG will fully cooperate with any FTA investigation of discrimination complaints to the extent required by Title VI regulations.

Requirements for Fixed Route Transit Providers:

Chapter IV of FTA Circular 4702.1B addresses the reporting requirements for all fixed route public transportation providers who are recipients and sub-recipients of Federal Transit Administration (FTA) funding to ensure that their activities comply with DOT Title VI regulations. MCOG provides FTA funds to Mendocino Transit Authority (MTA), the regional public transit provider. Since MTA is a fixed route provider and a sub-recipient of FTA funds, they are required to submit their Chapter IV information to MCOG every three years. The only information that MTA must submit to MCOG is their system-wide standards and policies. All other requirements of Chapter IV do not apply since MTA does not operate 50 or more vehicles in peak service and they are not located in a UZA with a population of 200,000 or more. That information will be submitted in conjunction with the update of this plan.

See Appendix M for MTA's current system-wide standards and policies.



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Mendocino Council of Governments

Limited English Proficiency Plan

Introduction

The purpose of this Limited English Proficiency Plan is to clarify the responsibilities of Mendocino Council of Governments (MCOG), as a recipient of federal financial assistance from the U.S. Department of Transportation (DOT), to persons with limited English proficiency (LEP), pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance.

Executive Order 13166 "Improving Access to Services for Persons With Limited English Proficiency," reprinted at 65 FR 50121 (August 11, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies and governments (such as MCOG), private and non-profit entities, and sub-recipients.

Plan Summary

MCOG has developed this Limited English Proficiency (LEP) plan to help identify reasonable steps to provide language assistance for LEP persons who seek meaningful access to MCOG services and activities as required by Executive Order 13166. As defined by this order, a person with Limited English Proficiency is one who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English.

This plan details procedures for identifying a person who may need language assistance, the ways in which assistance may be provided, staff training, how to notify LEP persons that assistance is available, and potential future updates to the plan.



Four Factor Analysis

The U. S. Department of Transportation (DOT) issued its Policy Guidance Concerning Recipient's Responsibilities to Limited English Proficient (LEP) Persons [Federal Register: December 14, 2005 (Volume 70, Number 239)]. This policy states that DOT recipients are required to take reasonable steps to ensure meaningful access to programs by LEP persons. This coverage extends to the recipient's entire program. There are four factors for agencies to consider when assessing language needs and determining what steps they should take to ensure access for LEP persons, regardless of whether or not the agency chooses not to prepare a written LEP plan. A brief description of the self-assessment undertaken in each of these areas follows.

In developing the plan, MCOG undertook a Four Factor Analysis as required by U.S. DOT. This considers the following factors:

- 1) The number or proportion of LEP persons to be served or likely to be encountered by MCOG.
- 2) The frequency with which LEP persons come into contact with MCOG programs, activities, or services;
- 3) The nature and importance of the programs, activities or services provided by MCOG to the population; and
- 4) The resources available to MCOG for LEP outreach, as well as the costs associated with that outreach.

A summation of these considerations is provided in the following section.

1. The number or proportion of LEP persons to be served or likely to be encountered by MCOG.

As Mendocino County's Regional Transportation Planning Agency, MCOG's work affects the entire County. To determine the number or proportion of LEP persons to be served or likely to be encountered, MCOG used Table B16004 from the 2024 American Community Survey 5-Year Estimates.

Executive Order 13166 defines a LEP person as one who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English. The data found in Table B16004 is separated into three age groups: 5 to 17 years, 18 to 64 years, and age 65 plus. The data in each age group is broken down by the language spoken at home. Finally, for each language spoken at home, the data is separated into four categories based on how well the person speaks English: "very well", "well", "not well", and "not at all". For the purpose of identifying a LEP person, MCOG examined data for those who speak English "well", "not well", or "not at all".

The table in Appendix K shows that for all people age 5 and over, there are 7,576 LEP people across the county who speak a language other than English at home and are not very proficient with the English language. This is approximately 8.85% of the total population.

DOT has adopted Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP populations.

"The 'Safe Harbor Provision' as defined by Department of Justice, stipulates that if a recipient provides



written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations."

MCOG further examined specific languages using the *2024 American Community Survey 5-Year Estimates: Language Spoken at Home for the Population 5 Years and Over* (Table C16001). This data allowed MCOG to determine which language groups fall under the 'Safe Harbor Provision'. Please refer to Appendix L: 2024 American Community Survey 5-Year Estimates: Language Spoken at Home for the Population 5 Years and Over.

All language groups other than Spanish have estimated populations of less than 1,000 persons and 5% of the total population. There are no languages that may approach the Safe Harbor Provision threshold in the foreseeable future.

2. The frequency with which LEP persons come into contact with MCOG programs, activities, or services.

According to the *2024 American Community Survey 5-Year Estimates*, the largest geographic concentration of LEP individuals in Mendocino County is Spanish-speaking. This population is approximately 18.8% of the population over 5 years of age, or an estimated population of 16,094. Those that speak English less than "very well" are 7.6% of the population or an estimated 6,484 people. MCOG regularly assesses the frequency at which staff has or could possibly have contact with LEP persons. This includes documenting phone inquiries and verbally surveying staff. MCOG staff has infrequent interactions with Spanish speakers.

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

All planning MCOG activities and programs are likely to affect some LEP individuals in Mendocino County.

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

MCOG has assessed its available resources that could be used for providing LEP assistance. Interpretation and translation services in Spanish may be provided by MCOG staff, when available, and may also be available through agencies such as Nuestra Alianza de Willits and Migrant Education. Language interpretation may be available for other languages in cooperation with Mendocino County Social Services and organizations such as the City of Ten Thousand Buddhas. In addition, MCOG's Title VI Notice and Complaint Procedures and Form (Appendices A – C) are available in both English and Spanish and can be found at MCOG's office and on the website. More complex professional interpretation or translation services are done on an as-needed basis.



Language Assistance Plan

A person who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to MCOG's services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

How MCOG staff may identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand
- All MCOG staff will be provided with "I Speak" cards to assist in identifying the language interpretation needed if the occasion arises.
- All MCOG staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- When MCOG sponsors an informational meeting or event, an advanced public notice of the event should be published including special needs related to offering a translator (LEP) or interpreter (sign language for hearing impaired individuals). MCOG may handout a Title VI survey (See Appendix I) in an effort to collect LEP data. Additionally, a staff person may greet participants as they arrive. 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 able to be provided at the event, it will help identify the need for future events.

Language Assistance Measures

Although there are a low percentage of LEP individuals within MCOG's service area, it will strive to offer the following measures:

1. MCOG 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. If an individual is a Spanish-speaker, interpretation and translation services may be available from staff as well as through agencies such as Nuestra Alianza and Migrant Education.
 - b. Language interpretation may be available for other languages in cooperation with Mendocino County Social Services and organizations such as the City of Ten Thousand Buddhas.
3. MCOG will publish meeting notices and minutes in Spanish and other languages upon request.



Staff Training

MCOG staff has and will continue to be trained annually on the following:

- Information on the Title VI policy and LEP responsibilities.
- The policy and procedures for interaction with LEP persons
- Description of language assistance services offered to the public.
- Use of the “I Speak” cards.
- Documentation of language assistance requests.
- How to handle a Title VI/LEP complaint.

See Appendix L for Training Materials.

Monitoring and Updating

MCOG's Language Assistance Plan is designed to be easily updated. At a minimum, MCOG will follow the Title VI Program update schedule of submission every 3 years.

Each update of the LEP Plan will examine plan components including, but not limited to:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether MCOG fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.

Dissemination of the LEP Plan

MCOG will include the LEP Plan along with the Title VI Program on their website (<http://www.mendocinocog.org/>). Any person, including social service, non-profit, and law enforcement agencies and other community partners with internet access will be able to access the plan. Copies of the Limited English Proficiency Plan will be provided, on request, to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request.

Any questions regarding this plan should be directed to the MCOG Title VI Coordinator:

MCOG Title VI Coordinator
525 S. Main Street, Suite B
Ukiah, CA 95482
Phone: (707) 462-1859



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Appendix A: Title VI Notice to Beneficiaries

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

For more information on MCOG's civil rights program and the procedures to file a complaint, contact (707) 463-1859; go online at <http://www.mendocinocog.org/>; or visit our office at 525 S. Main Street, Suite B, Ukiah, CA 95482.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Federal Transit Administration Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington DC 20590.

If information is needed in another language, contact (707) 463-1859.

Si se necesita información en otro idioma, llame al (707) 463-1859.



Appendix A: Título VI Aviso a los beneficiarios

Mendocino Council of Governments (MCOG) opera sus programas y servicios sin tener en cuenta raza, color y origen nacional, de conformidad con el Título VI del Acta de Derechos Civiles. Cualquier persona que cree que él o ella ha sido agraviada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante MCOG.

Para obtener más información sobre el programa de derechos civiles de MCOG y los procedimientos para presentar una queja, contacte a (707) 463-1859; ir en línea en <http://www.mendocinocog.org/>, o visite nuestra oficina administrativa en 525 S. Main Street, Suite B, Ukiah, CA 95482.

Un demandante puede presentar una queja directamente con la Administración Federal de Tránsito mediante la presentación de una queja ante la Oficina de Tránsito Administration Federal de Derechos Civiles, Atención:. Coordinador del Programa del Título VI, East Building, 5th Floor-TCR, 1200 New Jersey Ave., NW, Washington DC 20590.

Si se necesita información en otro idioma, llame al (707) 463-1859.



Appendix B: Title VI Complaint Procedures

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Mendocino Council of Governments (MCOG) may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. MCOG investigates complaints received no more than 180 days after the alleged incident. MCOG will process complaints that are complete.

All Title VI and related statute complaints are considered formal- there is no informal process. Complaints must be in writing and signed by the complainant on the form provided. Complaints must include the complainant's name, address and phone number and be detailed to specify all issues and circumstances of the alleged discrimination. Allegations must be based on issues involving race, color or national origin. Title VI Complaints of discrimination may be filed with:

Mendocino Council of Governments
Attn: Title VI Coordinator
525 S. Main Street, Suite B
Ukiah, CA 95482

Once the complaint is received, MCOG will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by MCOG.

MCOG has 30 days to investigate the complaint. If more information is needed to resolve the case, MCOG may contact the complainant. The complainant has 15 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 15 business days, MCOG 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, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 30 days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.



Appendix B: Procedimientos de Quejas del Título VI

Cualquier persona que cree que él o ella ha sido víctima de discriminación en base a raza, color, u origen nacional por el sistema de tránsito de Mendocino Council of Governments (MCOG) puede presentar una queja del Título VI, completando y enviando el Formulario de Quejas del Título VI de la agencia. MCOG investiga las quejas recibidas no más tardar 180 días después del supuesto incidente. MCOG procesará las denuncias que son completos.

Todos Título VI y las quejas de estatutos relacionados son considerados formales-no existe un proceso informal. Las quejas deben ser por escrito y firmado por el demandante en la forma proporcionada. Las quejas deben incluir el nombre del autor, dirección y número de teléfono y se detalla para especificar todas las cuestiones y circunstancias de la supuesta discriminación. Las denuncias deben basarse en cuestiones relacionadas con la raza, el color o el origen nacional. Quejas del Título VI de discriminación se pueden presentar con:

Mendocino Council of Governments
Attn: Title VI Coordinator
525 S. Main Street, Suite B
Ukiah, CA 95482

Una vez recibida la denuncia, MCOG lo revisará para determinar si nuestra oficina tiene jurisdicción. El demandante recibirá una carta de acuse de recibo informando a él / ella si la queja será investigada por MCOG.

MCOG tiene 30 días para investigar la denuncia. Si se necesita más información para resolver el caso, MCOG puede ponerse en contacto con el demandante. El demandante tiene 15 días hábiles desde la fecha de la carta a enviar la información solicitada para el investigador asignado al caso. Si el investigador no está en contacto con el reclamante o no reciba la información adicional dentro de los 15 días hábiles, MCOG puede cerrar administrativamente el caso. Un caso puede ser cerrado administrativamente también si el autor ya no desea seguir su caso.

Después de que el investigador revisa la queja, él / ella va a emitir una de las dos cartas a la denunciante: una carta de cierre o una carta de la búsqueda (LOF). Una carta de conclusión resume los hechos denunciados, y afirma que no hubo una violación del Título VI, y que el caso se cerrará. Un LOF resume los hechos denunciados y las entrevistas sobre el supuesto incidente y explica si alguna acción disciplinaria, la formación adicional del miembro del personal, u otra acción ocurrirá. Si el demandante desea apelar la decisión, él / ella tiene 30 días después de la fecha de la carta o el LOF para hacerlo.

Una persona también puede presentar una queja directamente con la Administración Federal de Tránsito, al TLC Oficina de Derechos Civiles, Atención: Coordinador de Programa del Título VI, Edificio Este, 5 º Piso-TCR, 1200 New Jersey Avenue NW, Washington, DC 20590.



Appendix C: Title VI Complaint Form

Section 601 under Title VI of the Civil Rights Act of 1964 states that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” **If you feel you have been discriminated against, please provide the following information in order to assist Mendocino Council of Governments in processing your complaint.**

SECTION 1 (Please print clearly):

Name: _____

Address: _____

City, State, Zip Code: _____

Telephone Number: _____ (Home) _____ (Work)

Accessible format requirements? ____ (Large print) ____ (Audiotape) ____ (TDD) ____ (Other)

SECTION 2

Are you filing this complaint on your own behalf? ____ (Yes) ____ (No)

If you answered yes to this question, go to Section 3.

If not, please supply the name and relationship of the person for whom you are complaining:

Name: _____ Relationship: _____

Please explain why you have filed for a third party: _____

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of the third party. ____ (Yes) ____ (No)

SECTION 3

I believe the discrimination I experienced was based on (check all that apply):

____ Race ____ Color ____ National Origin

Date and Place of Occurrence: _____

Name (s) and Title(s) of the person (s) who I believe discriminated against me:

The action or decision which caused me to believe I was discriminated against is as follows:

(Please include a description of what happened and how your benefits were denied, delayed or affected):

Please list any and all witnesses' names and phone numbers:



What type of corrective action would you like to see taken?

SECTION 4

Have you previously filed a Title VI complaint with this agency? ____ (Yes) ____ (No)

SECTION 5

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State Court? ____ (Yes) ____ (No)

If yes, check all that apply:

Federal Agency ____ Federal Court ____ State Agency ____ State Court ____ Local Agency ____

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

Name: _____ Title: _____

Agency: _____

Address: _____

Telephone Number: _____

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

I believe the above information is true and correct to the best of my knowledge.

Signature and date required below:

Signature

Printed Name

Date

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

Mendocino Council of Governments

Title VI Coordinator

525 S. Main Street, Suite B

Ukiah, CA 95482



Appendix C: Formulario de Quejas del Título VI

Sección 601 del Título VI del Acta de Derechos Civiles de 1964 establece que "Ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, ser excluida de participar en, ser negado los beneficios de, o ser sometido a la discriminación bajo cualquier programa o actividad que reciba asistencia financiera federal. **"Si usted siente que ha sido discriminado, por favor proporcione la siguiente información con el fin de asistir a Mendocino Council of Governments en el procesamiento de su queja.**

SECCIÓN 1 (Por favor escriba claramente):

Nombre: _____
Dirección: _____
Ciudad, Estado, Código Postal: _____
Número de teléfono: _____ (Casa) _____ (Trabajo)
Requisitos de formato accesible? ____ (Tipografía grande) ____ (Cinta de audio) ____ (TDD) ____ (Otros)

SECCION 2

¿Está usted presentando esta queja en su propio nombre? ____ (Sí) ____ (No)
Si usted contestó sí a esta pregunta, pase a la Sección 3.
Si no es así, por favor proporcione el nombre y la relación de la persona a la que usted se queja:
Nombre: _____ Relación: _____
Por favor, explique por qué usted ha presentado para un tercero: _____
Por favor, confirme que ha obtenido el permiso de la parte perjudicada, si usted está presentando en nombre de la tercera parte. ____ (Sí) ____ (No)

SECCIÓN 3

Creo que la discriminación que experimenté fue basada en (marque todo lo que corresponda):
____ Raza ____ Color ____ Origen Nacional
Fecha y lugar del accidente: _____

Nombre (s) y cargo (s) de la persona (s) que creo que me discriminó:

La acción o decisión que me hizo creer que fui discriminado es el siguiente:
(Por favor, incluya una descripción de lo que pasó y cómo se les negaba sus beneficios, retraso o afectados):

Por favor escriba los nombres de todas y todos los testigos y los números de teléfono:



¿Qué tipo de acción correctiva le gustaría que se tomar?

SECCIÓN 4

¿Ha presentado anteriormente una queja del Título VI con esta agencia? ____ (Sí) ____ (No)

SECCIÓN 5

¿Ha presentado esta queja con cualquier otro federal, estatal o local, o ante cualquier tribunal federal o estatal? ____ (Sí) ____ (No)

En caso afirmativo, marque todo lo que corresponda:

Agencia Federal ____ Tribunal Federal ____ Agencia Estatal ____ Tribunal Estatal ____ Agencia Local ____

Sírvanse proporcionar información acerca de una persona de contacto en la agencia / tribunal donde se presentó la queja.

Nombre: _____ Título: _____

Agencia: _____

Dirección: _____

Teléfono: _____

Puede adjuntar cualquier material escrito o cualquier otra información que usted considere relevante para su queja.

Creo que la información anterior es verdadera y correcta a lo mejor de mi conocimiento.

Firma y fecha requerida a continuación:

Firma

Nombre Impreso

Fecha

Por favor, envíe este formulario en persona en la dirección indicada más abajo o envíe por correo este formulario a:

Mendocino Council of Governments
Title VI Coordinator
525 S Main Street, Suite B
Ukiah, CA 95482



Appendix D: List of Transit-Related Title VI Investigations, Complaints, and Lawsuits

Per FTA Circular 4702.1B, “all recipients are required to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin”:

- Active investigations conducted by FTA and entities other than FTA
- Lawsuits; and
- Complaints naming the recipient

Thus far, Mendocino Council of Governments has not received Title VI Investigations, Complaints or Lawsuits. Below is the list that will be used for tracking these incidents:

Investigations, Lawsuits and Complaints

	Date (Month, Day, Year)	Summary (Include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.	N/A			
2.	N/A			
Lawsuits				
1.	N/A			
2.	N/A			
Complaints				
1.	N/A			
2.	N/A			



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Appendix E

Public Participation Plan
For
Mendocino Council of Governments



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Mendocino Council of Governments

Public Participation Plan

December 2020



Prepared by:

**Mendocino Council of Governments
525 S. Main Street, Suite B
Ukiah, CA 95482
707-463-1859**

INTRODUCTION

Background

The Mendocino Council of Governments (MCOG), the Regional Transportation Planning Agency (RTPA) for the Mendocino County region, was established in 1972 by a Joint Powers Agreement between the County and the four incorporated cities (Ukiah, Willits, Fort Bragg, and Point Arena). The MCOG Board consists of seven members— two county supervisors, a public appointee, and one council member from each of the four incorporated cities.

Region

Mendocino County lies within the northern extension of California's coast mountain ranges. These mountains are characterized by a series of southeast to northwest ridges that are separated occasionally by narrow valleys. The coastline is also rugged and rocky, offering spectacular views of the ocean. Much of the land area is taken by State and National Forest lands, with the remainder used for agriculture, residential and other uses. Transportation routes tend to be located within valleys, and east-west travel is especially difficult, since parallel ridges must be traversed. The mountainous nature of the County tends to minimize ground transportation options throughout the region.

The 2020 California Department of Finance population estimates place Mendocino County's population at 88,388. This includes an unincorporated population of 59,330 and an incorporated population of 29,058. Four cities share the incorporated population: Ukiah (16,029), Fort Bragg (7,471), Willits (5,117), and Point Arena (441).

The bulk of the population in Mendocino County is concentrated in a few areas of the county. Ukiah, Talmage, Calpella, and Redwood Valley make up the largest single population concentration. Fort Bragg and the coastal area southward to the Navarro River is another population center. Willits, the surrounding Little Lake Valley, and the Brooktrails subdivision comprise the only other large settlement area in the county. Much of the rest of Mendocino County is rural and undeveloped.

Federal Transportation Bill Requirements

The 2005 federal transportation bill, Safe, Accountable, Flexible and Efficient Transportation Equity Act – A Legacy for Users (SAFETEA-LU), emphasized the importance of public participation as part of the transportation planning process. The bill established the requirement for a public participation plan to be used by Regional Transportation Planning Agencies in their planning processes. These requirements were included in the current federal transportation bill, the Fixing America's Surface Transportation (FAST) Act, passed in 2015.

Purpose of This Plan

MCOG recognizes the importance of public participation as well as interagency and intergovernmental participation. Without input and involvement from members of the public, affected agencies, community groups, and other interested parties it would be difficult to develop a transportation program that effectively meets the needs of the county and its communities.

This plan will provide a clear directive for the public participation activities of MCOG, particularly as they pertain to the agency's primary responsibilities, which include development and implementation of the following:

- Regional Transportation Plan (RTP)
- Regional Transportation Improvement Program (RTIP)
- Annual Overall Work Program (OWP)
- Administration of Transit Development Act (TDA) funds
- Federal and state grant programs
- Coordinated Human Transportation Plan
- Transit studies
- Area transportation plans
- Special projects

ADVISORY COMMITTEES

Four standing committees aid MCOG in performing its transportation planning functions.

The **Policy Advisory Committee** (PAC) is composed of MCOG members and a Caltrans District 1 representative. At each MCOG Board meeting, the board members adjourn as the RTPA and reconvene as the PAC. Most items on the agenda are considered and voted on by the PAC, then ratified by MCOG. This allows Caltrans to participate in voting. The PAC typically meets once a month in conjunction with MCOG Board meetings.

The **Technical Advisory Committee** (TAC) is composed of planning and public works representatives from each of the Joint Powers entities, the Mendocino Transit Authority (MTA) General Manager, representatives from rail transportation and air quality, and a Caltrans transportation planner. The TAC considers and votes on matters of a technical nature. The TAC also makes recommendations to the MCOG Board on matters that will appear on their agendas. The TAC typically meets once a month.

The **Transit Productivity Committee** (TPC) is composed of two members from the MCOG Board of Directors, two members from Mendocino Transit Authority's Board of Directors, and one senior center representative selected by the senior

centers under MCOG's jurisdiction. The purpose of the TPC is to review transit performance and productivity issues in accordance with approved standards adopted by MCOG, including review of quarterly reports from MTA. The TPC will review and make recommendations to MCOG on the annual Transit Claim, and provide input on the "unmet transit needs" process, including findings of the SSTAC. Meetings will be held at least once annually, or quarterly if needed.

Senate Bill 498, approved in 1987, established the **Social Services Transportation Advisory Council (SSTAC)** which represents interests of the elderly, disabled, and persons of limited means. The SSTAC membership consists of a potential transit user 60 years of age or older, a potential transit user who is disabled, two representatives from social services providers for seniors, two representatives from local social service providers for the disabled, one representative from a local social service provider for persons of limited means, and two representatives from the local Consolidated Transportation Service Agency (MTA). The SSTAC is typically involved in transit related projects and plans, including the annual unmet transit needs process, Coordinated Human Services Transportation Plan and FTA grant programs. The SSTAC meets in the spring and fall.

Additional committees are formed on an as needed basis, typically to advise on a particular project or serve a specific function, such as a study advisory group.

PUBLIC & AGENCY PARTICIPATION GOALS & STRATEGIES

Goal 1: Provide all interested parties and agencies reasonable opportunities for involvement in the transportation planning process.

Strategy 1.1: Provide adequate public notice of public participation opportunities and activities and time for public review of regionally significant plans and documents.

Strategy 1.2: Utilize MCOG website as a means to alert the public and other agencies of the opportunity for public involvement in the transportation planning process when appropriate.

Strategy 1.3: Evaluate plans, programs, and projects to determine the most appropriate and effective tools and strategies for public and agency involvement and outreach.

Strategy 1.4: Provide the opportunity to comment on draft planning documents to affected local, state, federal and tribal agencies.

Strategy 1.5: Make transportation planning documents available for viewing on the MCOG website. Regionally significant documents, such as the RTP, shall also be made available at key locations throughout the

County including public libraries.

Strategy 1.6: In developing the RTP and other regionally significant plans, MCOG will consult with local, state, federal and tribal agencies and officials that may be affected by proposed planning activities, including planning, transportation, environmental, economic development, housing, private industry, and resource agencies, as appropriate.

Strategy 1.7: Prior to adoption, provide additional opportunity for public and agency review and comment if a regionally significant plan, including the RTP, differs significantly from the draft that was made available for public review and raises new material issues which could not reasonably have been foreseen from the public involvement efforts.

Strategy 1.8: During the transportation planning process, MCOG and its advisory bodies shall conduct open public meetings in accordance with the Brown Act (CGC Sec. 54950 et seq).

Strategy 1.9: Agendas for all MCOG board meetings and meetings of standing advisory bodies shall be posted a minimum of 72 hours prior to the meeting.

Goal 2: Increase public awareness and understanding of the transportation planning process in Mendocino County.

Strategy 2.1: Utilize MCOG's website to increase awareness of current transportation planning activities, and when appropriate, to communicate with the public about specific projects and plans in a non-technical, easily understood format.

Strategy 2.2: Employ visualization techniques as part of public involvement when appropriate.

Strategy 2.3: Provide information on regionally significant plans and projects to the local media for inclusion in their publications and/or reports.

Strategy 2.4: Maintain the MCOG website with current transportation planning activities, including reports and plans, as well as agendas and minutes for MCOG Board meetings.

Strategy 2.5: When appropriate, present information about specific plans and projects at public forums, such as City Council and Board of Supervisors meetings for increased public and governmental awareness.

Goal 3: Ensure accessibility to the transportation planning process and information for all members of the community.

Strategy 3.1: Hold public meetings at locations that are convenient and accessible to the public.

Strategy 3.2: When selecting meeting locations for community outreach activities, prioritize those locations that are accessible by means of public transit.

Strategy 3.3: When appropriate, incorporate tools that allow for alternate methods of participation.

Strategy 3.4: Make transportation planning documents available for viewing on the MCOG website. Regionally significant documents, such as the RTP, shall also be made available at key locations throughout the County including public libraries.

Strategy 3.5: Make every effort to accommodate requests for accessibility opportunities, including physical accessibility to public meetings as well as accessibility to information.

Goal 4: Maintain contact with interested individuals and agencies throughout the process of developing plans and projects.

Strategy 4.1: Encourage early involvement in the transportation planning process by providing timely notification and access to information regarding the development of plans and projects.

Strategy 4.2: Utilize citizen and/or agency advisory groups as a means of providing input to the transportation planning process. For some projects or plans, the TAC or SSTAC may serve this role.

Strategy 4.3: Maintain a contact list of agencies and individuals that may be interested in a specific project or plan.

Strategy 4.4: Identify key individuals and organizations, including small community organizations, that may be interested in or affected by a plan or program.

Strategy 4.5: Prior to adoption, provide additional opportunity for public and agency review and comment if a regionally significant plan, including the RTP, differs significantly from the draft that was made available for public review and raises new material issues which could not reasonably have been foreseen from the public involvement efforts.

Goal 5: Increase opportunities for those traditionally under-served, including the elderly, low income, disabled, and minority households, to participate in the transportation planning process.

Strategy 5.1: Utilize the Social Services Transportation Advisory Council (SSTAC) as a means of obtaining input and recommendations for plans and programs impacting the elderly, disabled and low-income communities, including the RTP and Coordinated Human Services Transportation Plan.

Strategy 5.2: Encourage representation on the SSTAC to be reflective of the underserved communities within Mendocino County.

Strategy 5.3: Offer key information, such as notices and announcements, in alternative languages when appropriate or requested.

Strategy 5.4: Provide the opportunity for alternative forms of public input (website, email, etc.) for individuals who are unable to attend public meetings or workshops.

Strategy 5.5: When appropriate, utilize alternative media outlets that may target minority or underserved segments of the community.

Goal 6: Consider public and agency input and comments as an integral part of MCOG's decision making process.

Strategy 6.1: Utilize citizen and/or agency advisory groups as a means of providing input to the transportation planning process. The TAC may serve in this function if appropriate.

Strategy 6.2: Conduct public opinion surveys to help identify the needs, interests and concerns of the population when appropriate.

Strategy 6.3: Consider the input of local, state, federal, and tribal agencies during the decision-making process.

Strategy 6.4: As appropriate, incorporate concerns, issues, and suggestions of the public and agencies when developing plans and projects.

Goal 7: Consult with tribal governments within Mendocino County and provide opportunities for tribal government input into the transportation planning process.

Strategy 7.1: Provide early notice of the development of transportation plans and programs to all tribal governments within Mendocino County.

Strategy 7.2: Provide the opportunity for direct consultation with tribal councils and/or administrators as part of the transportation planning process.

Strategy 7.3: Provide the opportunity for tribal governments and the tribal community to review significant plans and programs, including the Regional Transportation Plan and the Regional Transportation Improvement Program.

PUBLIC PARTICIPATION TOOLS

This section describes the public participation tools used by MCOG.

Most Common Public Participation Tools:

MCOG Website: MCOG's website, www.mendocinocog.org, provides MCOG's contact information, public notices, and meeting agendas and minutes. The site also includes transportation plans and programs, local transportation studies, and documents for public review and comment. The site allows visitors to subscribe to mailing lists to receive email updates on Board Agendas, news, and other topics.

Contact Lists: MCOG staff maintains a master list of all contacts, including public agencies, businesses, community groups, and members of the public. The list is used to establish and maintain a list of e-mail and regular mail contacts for general communications, electronic meeting notifications, and announcements.

Legal Advertisements: Legal notices are required to be published in a newspaper of countywide circulation. MCOG typically publishes notices in the Ukiah Daily Journal. Notices for items that may be of greater regional concern may also be published in the Fort Bragg Advocate, Independent Coast Observer, or Willits News. Notices may advertise meetings, agendas, or public comment periods on proposed plans, programs, or documents. The timeframe required for publication of legal notices varies depending on the type of project or plan being considered.

Project Workshops/Open-Houses: Public and agency workshops are often held during development of various transportation plans. Workshops may be held at the initial stage of plan development and later in the process to allow the public opportunity to comment on a draft plan or project concept. These are typically casual, open meeting formats. Notices of workshops may be advertised in the newspaper and on the website and often promoted through direct mailings or emails as well.

Small Group Meetings: These types of meetings would typically be with study or project advisory groups convened for specific projects. Meetings of these groups would take place during project development and for project or plan review.

Public Hearings: Public hearings are used to solicit public comments on a project or issue being considered by MCOG. Hearings provide a formal setting for citizens to provide comments to MCOG or another decision-making body. The requirement for a formal public hearing is usually statutorily established as is the need to publish a legal notice for the public hearing.

Press Releases: Press releases are sent to local media (newspaper, television, and radio) to announce upcoming meetings and activities and to provide information on specific issues being considered by MCOG or its committees.

Availability of Plans and Documents: Documents at all stages will be available for review by the public at the MCOG office and on the MCOG website. A copy of key regional draft documents, such as the RTP, may also be made available at other locations throughout the County, such as the public libraries.

Other Possible Tools for Public Outreach

Display Ads: Display ads in newspapers or on websites may be used to promote meetings that are not regularly scheduled or agenda items that may be of wide public interest. They are used to reach a larger audience than those that typically read legal ads. Display ads may also be used to advertise public comment periods on proposed plans, programs, or documents.

Direct Mailings: Letters or announcements may be mailed to lists of individuals or agencies regarding a specific project. Typically, the mailing list will be customized for a specific project.

Posters and Flyers: This tool would typically be used to promote a public workshop or meeting. The posters and flyers would be distributed at public places, such as city halls, libraries, and community centers for display. The announcement may contain a brief description of the purpose of the meeting/event, the time(s) and location(s), and contact information. Posters and flyers may be used to reach a large audience that cannot be reached using direct mailings and/or newsletters.

Surveys: Surveys may be used to gauge public opinion on certain issues. This tool has been used in the past to measure public support of a sales tax measure for transportation.

Radio and Television Ads: Paid radio and television ads may be used to generate public interest and involvement.

Member/Project Partner Agencies: MCOG may ask that member agencies (County and cities) or project partner agencies (such as Caltrans) share information about projects, events, or public engagement opportunities on their websites, social media accounts, or by other commonly used means.

PUBLIC PARTICIPATION PERFORMANCE MEASURES

The strategies and goals contained in this plan will be reviewed periodically to analyze their effectiveness and determine if modification to this plan is necessary. Strategies may be modified and additional strategies may be added to improve the public participation process.

The following indicators may be used in reviewing and determining the effectiveness of this plan:

- Number of public meetings and workshops
- Number and origin of participants at public meetings and workshops
- Number of hits to the MCOG website
- Number of comments received during the public comment period for projects and programs
- Revisions to plans or projects based on citizen and agency input

REVIEW OF PUBLIC PARTICIPATION PLAN

Per the federal transportation bill, this public participation plan will be made available for public review and comment for 45 days prior to adoption at a public hearing. Comments on the plan may be submitted to the MCOG offices by mail at 525 S. Main Street, Suite B, Ukiah, California, 95482. Comments may also be submitted via email to info@mendocinocog.org. Oral comments may be provided at MCOG Board meetings or via telephone at 707-463-1859.



Appendix F: Letter Acknowledging Receipt of Title VI Complaint

Today's Date

Ms. Jane Doe
1234 Main St.
Ukiah, CA 95482

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against Mendocino Council of Governments alleging _____.

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning (707) 463-1859, or write to:

Mendocino Council of Governments
Attn: Title VI Coordinator
525 S. Main Street, Suite B
Ukiah, CA 95482

Sincerely,

Mendocino Council of Governments Title VI Coordinator



Appendix G: Letter of Finding (Notifying Complainant that Complaint Is Substantiated)

Today's Date

Ms. Jane Doe
1234 Main St.
Ukiah, CA 95482

Dear Ms. Doe:

The matter referenced in your letter of _____ (date) against Mendocino Council of Governments alleging a Title VI violation has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of this matter. ***(If a hearing is requested, the following sentence may be appropriate.)*** You may be hearing from this office, or from Federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Mendocino Council of Governments Title VI Coordinator



Appendix H: Closure Letter (Notifying Complainant that the Complaint Is Not Substantiated)

Today's Date

Ms. Jane Doe
1234 Main St.
Ukiah, CA 95482

Dear Ms. Doe:

The matter referenced in your complaint of _____ (date) against Mendocino Council of Governments alleging _____ has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964, have in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving Federal financial assistance.

Mendocino Council of Governments has analyzed the materials and facts pertaining to your case for evidence of Mendocino Council of Governments' failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files.

You have the right to appeal this decision within thirty calendar days of receipt of this final written decision from Mendocino Council of Governments.

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to contact me.

Sincerely,

Mendocino Council of Governments Title VI Coordinator



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Appendix I

Caltrans Public Participation Survey

Participating Agency: Mendocino Council of Governments

The following information is being collected by the California Department of Transportation (Caltrans) in order to comply with Title VI of the Civil Rights Act of 1964, *Nondiscrimination in Federally Assisted Programs*. Please take a few moments to complete the following questions. The data you provide will enable Caltrans to identify residents and communities impacted by federally funded projects/or activities. Please check the appropriate boxes with an "X" that best describes you and return the completed survey to the event coordinator. Submittal of this information is *voluntary*.

Sex

☐ Male ☐ Female

Ethnicity

☐ Hispanic or Latino ☐ Not Hispanic or Latino

Race

☐ American Indian or Alaska Native
☐ Black or African American
☐ Native Hawaiian or other Pacific Islander
☐ Asian
☐ White
☐ Other: _____

Disability

☐ Yes ☐ No

Age

☐ Under 40 ☐ Over 40

Income

☐ \$22,050 or Less
☐ Over \$22,051

Language

What language is primarily spoken in your household? _____



Categories and Definitions

The minimum categories for data on race and ethnicity for federal statistics, program administrative reporting, and civil rights compliance reporting are defined as follows:

- a. **American Indian or Alaska Native:** A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.
- b. **Asian:** A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- c. **Black or African American:** A person having origins in any of the black racial groups of Africa.
- d. **Hispanic or Latino:** A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- e. **Native Hawaiian or other Pacific Islander:** A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- f. **White:** A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.



Appendix I

Caltrans Encuesta de Participación Pública

Agencia participante: Mendocino Council of Governments

La siguiente información está siendo recopilada por el Departamento de Transporte de California (Caltrans) con el fin de cumplir con el Título VI del Acta de Derechos Civiles de 1964, No discriminación en los programas de asistencia federal. Por favor tómese unos minutos para completar las siguientes preguntas. Los datos que proporcione permitirá Caltrans para identificar los residentes y las comunidades afectadas por los proyectos financiados por el gobierno federal / o actividades. Por favor, marque las casillas correspondientes wiht una "X" que mejor te describes y devuelva la encuesta completada a la coordinadora del evento. La presentación de esta información es voluntario.

Sexo

☐ Hombre ☐ Mujer

Etnicidad

☐ Hispano or Latino ☐ No Hispano or Latino

Raza

- ☐ Indio Americano o Nativo de Alaska
- ☐ Americano Negro o Africano
- ☐ Hawaiano Nativo o otra Isla del Pacifico
- ☐ Asiático
- ☐ Blanco
- ☐ Otro: _____

Discapacidad

☐ Sí ☐ No

Edad

☐ Menos de 40 ☐ Más de 40

Ingresos

- ☐ \$22.050 o Menos
- ☐ Más de \$22.051

Idioma

¿Qué idioma se habla principalmente en su hogar? _____



Categorías y Definiciones

Las categorías mínimas para datos de raza y origen étnico de las estadísticas federales, informes administrativos del programa, y los informes de cumplimiento de los derechos civiles se definen como sigue:

- a. **Indio Americano o Nativo de Alaska:** Una persona que tiene orígenes en cualquiera de los pueblos originales de Norte y Sudamérica (incluyendo América Central), y que mantiene una afiliación tribal o de comunidad.
- b. **Asiático:** Una persona que tiene orígenes en cualquiera de los pueblos originales del Lejano Oriente, Sureste de Asia o el subcontinente indio, incluyendo, por ejemplo, Camboya, China, India, Japón, Corea, Malasia, Pakistán, las Filipinas, Tailandia y Vietnam.
- c. **Americano Negro o Africano:** Una persona que tiene orígenes en cualquiera de los grupos raciales negros de África.
- d. **Hispano or Latino:** Una persona de origen Cubano, Mexicano, Puertorriqueño, Centro o Sudamericano o de otra cultura u origen Español, sin importar la raza.
- e. **Hawaiano Nativo o otra Isla del Pacífico:** Una persona que tiene orígenes en cualquiera de los pueblos originales de Hawai, Guam, Samoa u otras Islas del Pacífico.
- f. **Blanco:** Una persona que tiene orígenes en cualquiera de los pueblos originales de Europa, el Medio Oriente o África del Norte.



Appendix J

Training Materials



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POLICY AND PROCEDURES FOR INTERACTIONS WITH LEP PERSONS

POLICY:

Mendocino Council of Governments (MCOG) will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our services, activities, programs and other benefits. The policy of MCOG is to ensure meaningful communication with LEP clients and their representatives. All interpreters, translators and other aids needed to comply with this policy shall be provided without cost to the person being served, and clients will be informed of the availability of such assistance free of charge.

Language assistance will be provided through use of competent bilingual staff and arrangements with local organizations providing interpretation or translation services. All staff will be provided notice of this policy and procedure, and staff that may have direct contact with LEP individuals will be trained in effective communication techniques.

PROCEDURES:

1. IDENTIFYING LEP PERSONS AND THEIR LANGUAGE

Mendocino Council of Governments will promptly attempt to identify the language and communication needs of the LEP person. If necessary, staff will use a language identification card (the "I Speak" cards). In addition, when records are kept of past interactions with clients the language used to communicate with the LEP person will be included as part of the record.

2. OBTAINING A QUALIFIED INTERPRETER

MCOG staff is responsible for maintaining an accurate and current list showing the name, language, phone number and hours of availability of bilingual resources (including staff). Staff is also responsible for contacting the appropriate bilingual resource to interpret, in the event that an interpreter is needed;

If the LEP person's native language is not English, contact the Mendocino County Social Services for available resources. If no resources are available, document the interaction so that resources for the particular language will be available in the future.

3. DOCUMENTING INTERACTIONS WITH LEP PERSONS

When MCOG staff interacts with a LEP person, they must document the encounter using the LEP Documentation Form. This will help the Center track which languages may be needed in the future to assist LEP clients.



LEP Documentation Form

Date of Contact: _____

Location of Contact: _____

Name of staff member filling out form: _____

Indicate language of LEP person: SPANISH Other: _____

How were the LEP language needs met? _____

Please describe the nature of the LEP person's visit: _____

Were their needs met by the end of the visit? ☐ Yes ☐ No



2004 Census Test		2010 Census	
LANGUAGE IDENTIFICATION FLASHCARD			
☐	ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic	
☐	Խոսքով կամ "սրբով" արարածք չես ցարածարարով, կենդանիս կամ կարծիքով երբեք չսխալվիր:	2. Armenian	
☐	যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।	3. Bengali	
☐	ឈ្មោះបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	4. Cambodian	
☐	Moṭka i kahhōn ya yangin ūntūngnu' manaitai pat ūntūngnu' kumentos Chamorro.	5. Chamorro	
☐	如果你能读中文或讲中文，请选择此框。	6. Simplified Chinese	
☐	如果你能讀中文或講中文，請選擇此框。	7. Traditional Chinese	
☐	Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	8. Croatian	
☐	Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	9. Czech	
☐	Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	10. Dutch	
☐	Mark this box if you read or speak English.	11. English	
☐	اگر خواندن و نوشتن فارسی بلد هستید این مربع را علامت بزنید.	12. Farsi	

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☐ Cocher ici si vous lisez ou parlez le français.	13. French
☐ Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
☐ Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
☐ Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
☐ अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
☐ Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
☐ Jelölje meg ezt a kockát, ha megérti vagy beszél a magyar nyelvet.	19. Hungarian
☐ Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
☐ Marchi questa casella se legge o parla italiano.	21. Italian
☐ 日本語を話んだり、話せる場合はここに印を付けてください。	22. Japanese
☐ 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
☐ ເລືອກໃສ່ຂອງຖ້າທ່ານສາມາດອ່ານຫລືພາສາລາວ.	24. Laotian
☐ Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

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☐	Assinale este quadrado se você lê ou fala português.	26. Portuguese
☐	Însemnați această căsuță dacă citiți sau vorbiți românește.	27. Romanian
☐	Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
☐	Обележите ovaj kvadratić ukoliko čitate или говорите српским језиком.	29. Serbian
☐	Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
☐	Marque esta casilla si lee o habla español.	31. Spanish
☐	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
☐	ไม่มีการใช้เครื่องหมายใด ๆ ในการอ่านหรือพูดภาษาไทย.	33. Thai
☐	Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
☐	Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.	35. Ukranian
☐	اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	36. Urdu
☐	Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
☐	באמצעות דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish

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Appendix K: 2024 American Community Survey 5-Year Estimates

2024 American Community Survey 5-Year Estimates	
Language Spoken at Home	Total
Total:	85,578
<u>5 to 17 Years</u>	14,231
English only:	10,149
Spanish	3,883
<i>Speak English less than "very well"</i>	408
Other Indo-European languages:	60
<i>Speak English less than "very well"</i>	0
Asian and Pacific Island languages:	123
<i>Speak English less than "very well"</i>	0
Other languages:	16
<i>Speak English less than "very well"</i>	0
<u>18 to 64 Years</u>	49,193
English only:	36,179
Spanish	11,159
<i>Speak English less than "very well"</i>	5,343
Other Indo-European languages:	766
<i>Speak English less than "very well"</i>	127
Asian and Pacific Island languages:	1,000
<i>Speak English less than "very well"</i>	674
Other languages:	89
<i>Speak English less than "very well"</i>	0
<u>65 Years and over</u>	22,154
English only:	20,315
Spanish	1,052
<i>Speak English less than "very well"</i>	733
Other Indo-European languages:	435
<i>Speak English less than "very well"</i>	30
Asian and Pacific Island languages:	302
<i>Speak English less than "very well"</i>	258
Other languages:	50
<i>Speak English less than "very well"</i>	3

Sources:

"2024 American Community Survey 5-Year Estimates: Age by Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over" (Table B16004) for Mendocino County



Appendix L

2024 American Community Survey 5-year Estimates: Language Spoken at Home for the Population 5 Years and Over

	Mendocino County	% of Population
Total:	85,578	100.0%
Speak only English	66,643	77.9%
Spanish:	16,094	18.8%
Speak English "very well"	9,610	11.2%
Speak English less than "very well"	6,484	7.6%
French, Haitian, or Cajun:	401	0.5%
Speak English "very well"	366	0.4%
Speak English less than "very well"	35	0.0%
German or other West Germanic languages:	292	0.3%
Speak English "very well"	292	0.3%
Speak English less than "very well"	0	0.0%
Russian, Polish, or other Slavic languages:	125	0.1%
Speak English "very well"	89	0.1%
Speak English less than "very well"	36	0.0%
Other Indo-European languages:	443	0.5%
Speak English "very well"	357	0.4%
Speak English less than "very well"	86	0.1%
Korean:	96	0.1%
Speak English "very well"	11	0.0%
Speak English less than "very well"	85	0.1%
Chinese (incl. Mandarin, Cantonese):	691	0.8%
Speak English "very well"	211	0.2%
Speak English less than "very well"	480	0.6%
Vietnamese:	243	0.3%
Speak English "very well"	69	0.1%
Speak English less than "very well"	174	0.2%
Tagalog (incl. Filipino):	69	0.1%
Speak English "very well"	33	0.0%
Speak English less than "very well"	36	0.0%
Other Asian and Pacific Island languages:	326	0.4%
Speak English "very well"	169	0.2%
Speak English less than "very well"	157	0.2%
Arabic:	45	0.1%
Speak English "very well"	45	0.1%
Speak English less than "very well"	0	0.0%
Other and unspecified languages:	110	0.1%
Speak English "very well"	107	0.1%
Speak English less than "very well"	3	0.0%

Source: "2024 American Community Survey 5-Year Estimates: Language Spoken at Home for the Population 5 Years and Over" (Table C16001) for Mendocino County



Appendix M

Mendocino Transit Authority

System-Wide Standards & Policies



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MTA GOALS, OBJECTIVES, AND POLICIES

The 2016 MTA SRTDP set forth goals, objectives, and policies to guide MTA decision-making. These policies are summarized below, along with recommendations on how the previously adopted goals and policies should be modified for the current 2024 SRTDP. If nothing is listed below the goal, then no changes are recommended at this time.

Mission Statement

The MTA's mission statement is "To provide, safe, courteous, reliable, affordable and carbon-neutral transportation service."

- *Recommendation:* No change. This mission statement continues to exemplify the type of service the MTA strives to provide.

Goals

MTA has five adopted goals:

1. Provide affordable, reliable, efficient, and user-friendly transit service that effectively meets the local mobility needs of those residents of, or visitors to, the MTA service area who have limited mobility options. Where practical, also serve the needs of those who choose mobility for some, or all, of their local travel needs for environmental or lifestyle reasons.
2. Provide a regional link to local destinations as well as to intercity transportation alternatives and destinations outside Mendocino County.
3. Operate as efficiently, economically, and environmentally friendly as possible, so as to maximize the amount of service provided in a carbon-neutral manner. Ensure the financial stability of MTA.
4. Adopt procurement, management, and building practices that minimize environmental impacts and achieve a carbon-neutral operation, with a long-term fleet goal of zero emissions.
 - *Recommendation:* Rephrase the goal to say, "Adopt procurement, management, and building practices that minimize environmental impacts and achieve a carbon-neutral operation. Continue to implement the vehicle procurement plan presented in the MTA Zero-Emission Bus Rollout Plan so as to achieve a 100 percent zero-emissions fleet by 2040 or earlier."
5. Strongly support:
 - County and local land use planning that encourages compact growth and transit access;
 - Local economic development that provides good-paying jobs without long commutes;
 - Travel demand management that minimizes the carbon footprint of Mendocino County's mobility system;
 - Congestion mitigation that reduces idling; and
 - Environmental goals that support sustainable living.

Objectives and Policies

The MTA has ten adopted objectives. Each of the objectives has related policies to help the MTA achieve its objectives. This section lists the MTA's objectives and policies, with any recommended changes mentioned below the specific policy.

Objective A: Maximize service availability, reliability, and convenience.

- Policies:
 1. Priority should be given to serving the general mobility needs of low-income households, youth, seniors, students, and persons with disabilities. These are the primary transit markets that currently, and will in the future, use public transit in Mendocino County.
 2. In Mendocino County communities where fixed route, flex route, and Dial-a-Ride services cannot maintain minimum productivity and farebox recovery standards, mobility management strategies such as e-Ride (volunteer driver program), vanpools, carpools, taxi ride subsidies will be considered to provide needed mobility options for both priority target market segments and riders desiring an alternative to driving as a means of saving money or reducing their carbon footprint.
- *Recommendation:* Add microtransit to the list of mobility management strategies.
- 3. In Mendocino County communities where fixed route or demand response services are meeting productivity and farebox recovery standards, mobility management strategies may be implemented if they complement existing mobility services, are not in competition with MTA routes or services, and do not deteriorate the productivity and farebox recovery standards of existing services.
- *Recommendation:* Delete service-specific farebox recovery standards.
- 4. Increase visibility and awareness of available transit services through effective branding and signage on vehicles and at bus stops.
- 5. Enhance ease of use for new and existing riders by ensuring that information about services and how to use them is provided in easy-to-understand, easily accessible formats – in printed materials, on the internet, and at bus stops. Passenger information will be available in Spanish, as well as English.
- 6. Actively market fixed route services to Mendocino County populations with high levels of potential for transit ridership, including college and secondary students, the Latino Community, low-income families and workers, seniors, and persons with disabilities.

7. Ensure sufficient capacity to maximize service availability to all priority transit markets throughout the service day. Although service capacity is ultimately determined by funding, ensure that a reasonable level of service is available.
8. Adopt a zero-tolerance policy for the cancellation of scheduled service due to a lack of in-service vehicles or driver availability.
- *Recommendation:* Add a service delivery standard of 100 percent of scheduled trips for paratransit and on-demand services.
9. Provide an adequate number of vehicles in each overnight vehicle storage location to meet all bus pullout requirements.
10. Ensure the availability of sufficient bus capacity to avoid passenger pass-ups on each fixed route. This can be accomplished by increasing bus size or service frequencies.
11. Ensure adequate bus capacity to accommodate passenger loads within the adopted maximum load standards established for MTA services.
12. Ensure sufficient round-trip travel time for all fixed route services to facilitate on-time performance within an adopted on-time performance standard.
13. Ensure on-time performance by scheduling adequate recovery time into all fixed route and flex route schedules.
14. Establish timed transfers between local South Coast, North Coast, and Inland services and MTA regional services.
15. Establish schedules around critical arrival or departure times for the customers served by MTA local fixed routes and regional routes, where possible.
16. Operate clock face schedules on local fixed routes and intercity services, where practical.
- *Recommendation:* Re-word to: “Operate fixed route and intercity services on regular time intervals (i.e. same minutes every hour).”
17. Scheduled fixed route buses will not depart a time point before the published departure time in the schedule.

18. Ensure adequate ADA complementary paratransit wheelchair and ambulatory capacity to meet all confirmed ADA-eligible trips within the adopted ADA service area, wait time, maximum travel, and on-time performance standards and with a zero-trip denial rate. ADA Paratransit Dial-a-Ride trips have priority over non-ADA Paratransit Dial-a-Ride trips. Reservation policies should be clear that individuals who are not ADA Paratransit individuals can be bumped by a registered ADA Paratransit individual.

➤ *Recommendation:* Replace “bumped” with “re-scheduled in favor of.”

19. MTA can exceed ADA Paratransit service criteria for service area, wait time, hours of operation, and reservation policies if financial resources allow. MTA can also reduce the service area, wait time, hours of operation, and reservation policies if financial conditions require such reductions.

Objective B: Maximize operating efficiency without negatively impacting service quality.

- Policies:

1. Establish minimum productivity performance policies for fixed route transit, flex route, and Dial-a-Ride services. A minimum fixed route productivity standard as measured by the number of passengers carried per revenue hour should be based on achieving an MTA systemwide 15 percent farebox recovery ratio. Minimum productivity policies are established by MCOG as part of the Transit Productivity Committee process and shall be incorporated in MTA service performance and design standards and be subject to annual review as operating costs change. Services that fall below minimum productivity standards should be considered for cancellation, reduction, or adjustment when funding is insufficient to meet full program requirements.

➤ *Recommendation:* Modify farebox recovery ratio to 10 percent systemwide, including local support.

2. Evaluate and consider requests for the extension of service hours, the expansion of service area coverage, and the introduction of additional services based on the potential of the new services to achieve minimum productivity performance policies. MTA shall introduce or implement new services on a pilot project basis for a trial period not to exceed 24 months. During this period the new service will be evaluated and adjusted to improve performance. Productivity expectations shall be established for the evaluation of new services during the pilot project period.
3. Bus specifications will be developed with input from both operating and maintenance staff. The Management/Supervisory Committee provides a good forum for the review and development of bus specifications, based on driver and mechanic feedback.

4. Maximize ride-sharing, linked trip, and productive Dial-a-Ride vehicle utilization by using scheduled trip assignment parameters and procedures that ensure the achievement of the minimum productivity policy for Dial-a-Ride service.

Objective C: Operate a productive service that remains affordable to the priority transit markets.

- Policies:
 1. Maintain adopted farebox recovery ratio standards by operating productive and efficient services to minimize fare increases.
 2. Maintain affordable fares for youth, seniors, and persons with disabilities on fixed route services. MTA shall provide discounted fare media for procurement by social service agencies.
 3. Fare discount percentages for fare media should increase the longer time commitment a passenger makes in procuring a fare media (e.g. a month pass should have a higher discount percentage than a 16-ride punch pass).
 4. Offer lower fixed route fares than Dial-a-Ride fares to encourage a shift in ridership to fixed route service. Maintain a base Dial-a-Ride fare for ADA-eligible registrants that is double the base adult cash fare for local fixed route service to comply with ADA regulations. This fare policy should also apply to seniors and disabled persons who, while not ADA certified, are eligible for MTA senior and disabled Dial-a-Ride. The general public Dial-a-Ride fare shall be at least four times the base adult cash fare for local fixed service.
 5. For individuals who can utilize fixed route or flex route services, discourage the utilization of Dial-a-Ride through fare incentives and reservation policies.
- *Recommendation:* Eliminate # 4 and 5. Maintain a fare structure which is easy to understand, equitable and encourages ridership.

Objective D: Promote the coordination of service with other intercounty and intercity transportation services.

- Policies:
 1. Maintain good connections with Lake County Transit in Ukiah (currently Pear Tree Mall and Mendocino College), where feasible.
 2. Maintain good connections with Greyhound in Willits, Ukiah, and at the Santa Rosa Greyhound depot, where feasible.
 3. Maintain good connections with the SFO Airporter at the Sonoma County Airport, where feasible.

4. Maintain good connections with the Amtrak Thruway Bus at the Santa Rosa Courtyard by Marriott, where feasible.
 5. Provide riders with user-friendly information about connecting transit services in printed materials, at transfer points, and on the Internet.
- *Recommendation: Adopt a new standard of “Maintain good connections with the Humboldt Transit Authority Redwood Coast Express at the Pear Tree Center and other Ukiah locations, where feasible.”*

Objective E: Promote public/private partnerships to increase transit revenues and ridership thereby reducing the carbon footprint of Mendocino County transit users who choose to utilize MTA for their mobility needs.

- Policies:
 1. Continue to foster partnerships with Mendocino County’s Senior Centers to provide door-through-door transportation where cost-effective to do so. Coordinate with Senior Centers on the provision of Dial-a-Ride services to ensure overall mobility service delivery meets the needs of seniors and the disabled in the most cost-effective manner possible.
 2. Provide technical assistance to Senior Center Transportation Programs as needed to assist in meeting farebox recovery, passengers per hour, cost per passenger, and cost per hour performance standards.
 3. Leverage available demand response financial resources such that efforts are made to provide needed demand response services, including ADA paratransit services, most effectively.
 4. Explore joint promotions and partnerships with retailers and services for the production of MTA information brochures, and weekend and evening service hour sponsorship.
 5. Assist major employers, tribal councils, or community organizations in seeking and/or establishing mobility services for needs that MTA cannot effectively serve within the approved minimum service productivity standards.
 6. Provide capital procurement support to partners if feasible.
 7. Partner with gatekeeper organizations including colleges, schools, social service agencies, employment agencies, and other community organizations to educate and promote transit usage among specific target constituencies.

Objective F: Ensure ongoing service monitoring, evaluation, and planning.

- Policies:
 1. MTA will actively monitor service performance through the monthly and quarterly review of operating and cost performance reports, and regular field spot checks.
 2. MTA will continue to coordinate a management, maintenance, and operations staff forum for the ongoing review and resolution of operations and service quality issues; monitoring achievement of carbon neutral operations; the development and amendment of vehicle specifications that reduce emissions below the 2008 baseline with the trend line towards the long-term goal of zero fleet emissions.
- *Recommendation:* Rephrase the goal to say, “.... the review of progress towards implementing the MTA Zero Emission Bus Rollout Plan, with the goal being a 100 percent zero-emissions fleet by 2040 or earlier.”
- 3. MTA management and supervisor staff will regularly ride service in their respective service areas to develop a firsthand understanding of who uses the service, operating issues, and key destinations.
- 4. MTA will work with Mendocino County to join ICLEI and adopt their measurement tool to annually measure the impacts of MTA operations on carbon emissions, measuring the impacts of fleet, office, and facility practices as well as the net benefit of new riders that were previously utilizing an automobile for the trips that are now taken on MTA.

Objective G: Establish a formal role in the local and county development process.

- Policies:
 1. MTA should actively participate in the development review process to ensure that transit operations are considered as part of new developments at the initial planning stages.
 2. Actively participate and attend working sessions and provide comments on city and County general plan updates and specific plans and development proposals in order to achieve the carbon-neutral MTA goal.

Objective H: Adhere to prudent budgeting and financial practices.

- Policies:
 1. Develop and maintain a five-year financial plan covering operating and capital financial needs and revenue sources preceding the annual budget process.
 2. Use realistic and fiscally conservative estimates of costs and revenues in preparing the five-year financial service plan. Utilize a range of financial scenario assumptions to account for the uncertainty of financial outcomes.

3. When feasible, MTA shall accumulate a minimum of a 3-month cash reserve and a target of a 6-month cash reserve. This will facilitate a planned and strategic response to sudden drops in revenue and minimize a “reactive” response.
4. Develop balanced annual budgets. Report financial performance and anticipated service adjustments to the MTA Board of Directors every month.
5. Deficit spending should be avoided. Unforeseen overruns should be offset by reserve funds.

Objective I: Adopt fleet procurement practices that contribute to a carbon-neutral goal and meet CARB Fleet Rule for Transit Agencies.

- *Recommendation:* Rephrase goal to say, “.... and meets the minimum standards set forth in the CARB Innovative Clean Transit regulation.”
- Policies:
 1. Conduct a life cycle benefit/life cycle cost assessment of future fleet procurements to determine the cost per unit of emissions reduced compared to a 2009 fleet baseline. Purchase vehicles that are cost-effective and move MTA towards a zero-emissions fleet, and at a minimum meet CARB fleet rules for emissions.
 - *Recommendation:* Rephrase goal to say, “.... and meets the minimum standards set forth in the CARB Innovative Clean Transit regulation.”
 2. The MTA vehicle retirement program shall recognize the effective life cycle of the various MTA vehicle types according to Federal Transit Administration standards. Adopt a five-year or 150,000-mile life cycle for light-duty buses, a seven-year or 200,000-mile life cycle for medium duty, and a 12-year or 500,000-mile life cycle for heavy-duty buses.
 3. Consider bus refurbishment before bus replacement as part of environmental and financial sustainability policies.
 4. Procure fuels that minimize carbon dioxide, particulate matter, nitrogen oxide, and sulfur emissions.
 - *Recommendation:* Add a standard to maintain a systemwide fleet spare ratio of 40 percent.
 - *Recommendation:* Add a fleet preventive maintenance policy of 80 percent of preventive maintenance performed within 10 percent of the scheduled mileage interval, or at least every 3 months.

Objective J: Adopt site development practices that contribute to a carbon-neutral goal.

- Policy:
 1. Future site and facility development should achieve LEED sustainable building practices and LEED certification should be considered in the early stages of development. MTA can go through the LEED certification process or decide to design facilities to LEED sustainable building standards, practices, and principles without going through the formal certification process.

MTA PERFORMANCE STANDARDS

MTA's performance standards are established by MCOG through the Transit Productivity Committee (TPC). The TPC meets annually to review and amend performance standards. MTA prepares and submits monthly, quarterly, and annual reports to MTA and MCOG staff, the MTA Board, and the MCOG Board to monitor performance. MTA FY 2022-23 performance was analyzed using the current MCOG performance standards in Chapter 4.

This section presents recommended performance standards for both the MTA and the senior center DAR programs to be used for the SRTDP planning period (FY 2024-25 through FY 2028-29). Any proposed changes to the current performance standards are explained briefly. The performance standards are meant to be adaptable and should be revised if merited.

TDA-Required Performance Standards

MCOG has adopted four performance standards to measure the efficiency of transit services. These four standards are also evaluated every three years as part of the TDA Triennial Performance Audit. The newly recommended efficiency standards are shown in Table 24 and discussed below.

- **Passenger-Trips per Vehicle Service Hour** – It is recommended that the MTA reduce its standards for passenger-trips per vehicle service hour to better reflect the transit environment post-pandemic. The standards presented in Table 24 are based on standards recently adopted by peer transit systems in northern California as well as recent MTA performance.
- **Operating Cost per Vehicle Service Hour** – Table 24 presents recommended standards for operating cost per vehicle service hour. No changes are recommended to the fully allocated cost standards, however, it is recommended that MTA also adopt standards for the marginal operating cost per vehicle service hour. Marginal costs exclude fixed costs, such as administrative staff time, utilities, marketing, etc., which will not change if service is increased or decreased. The recommended marginal cost standards presented in Table 24 were calculated by multiplying the fully allocated standards by 50.9 percent (50.9 percent is equal to the ratio of the systemwide marginal cost per hour to the systemwide fully allocated cost per hour). It is recommended that the operating cost per hour standards continue to be updated annually based on the Consumer Price Index (CPI) Adjusted Rolling Average.

Table 24: Recommended MTA Performance Standards - Productivity and Efficiency

Passenger-Trips Per Vehicle Service Hour			
Service Type	Current MCOG Standard	Recommended Standards	
		Minimum	Target
Short Distance Bus Routes	10.2	6.0	8.0
Long Distance Bus Routes	3.2	3.0	4.0
Senior Centers	2.2	1.5	2.0
Dial-a-Ride / On-Demand	3.3	2.0	2.5

Cost Per Vehicle Service Hour			
Service Type	Current MCOG Standard	Recommended Standards	
		Fully Allocated	Marginal
Short Distance Bus Routes	\$176.53	\$176.53	\$89.92
Long Distance Bus Routes	\$194.76	\$194.76	\$99.21
Senior Centers	\$86.02	\$86.02	--
Dial-a-Ride / On-Demand	\$124.08	\$124.08	\$63.20

Cost Per Passenger-Trip			
Service Type	Current MCOG Standard	Recommended Standards	
		Fully Allocated	Marginal
Short Distance Bus Routes	\$38.65	\$38.65	\$19.38
Long Distance Bus Routes	\$60.86	\$60.86	\$30.51
Senior Centers	\$46.03	\$46.03	--
Dial-a-Ride / On-Demand	\$37.60	\$37.60	\$18.85

Farebox Recovery Ratio		
Service Type	Current MCOG Standard	Recommended Standards
Short Distance Bus Routes	10%	--
Long Distance Bus Routes	10%	--
Senior Centers	10%	10%
Dial-a-Ride / On-Demand	10%	--
MTA Systemwide	--	10% with local support

Note 1: Short distance routes include Routes 1, 5, 7, and 9.

Note 2: Long distance routes include Routes 20, 60, 65, 75, and 95.

Note 3: Senior Centers refers to the paratransit services operated by local senior centers using TDA funding.

Note 4: MCOG uses "CPI Adjusted Rolling Average" figures for financial performance standards. The CPI Adjusted Rolling Average is calculated using the Consumer Price Index Annual Average, All Urban Consumers, California. In this table, the standards for the cost per vehicle service hour and cost per passenger-trip represent recommended values for FY 2023-24; these standards should be updated annually per the CPI Adjusted Rolling Average.

Note 5: Fully allocated cost values include all fixed costs (administrative costs, utilities, etc.), while marginal cost values excludes these costs .

Source: MCOG, MTA

- **Operating Cost Per Passenger-Trip** – Similar to the standards for the operating cost per vehicle service hour, this SRTDP also recommends the MTA adopt both fully allocated and marginal cost standards for operating cost per passenger-trip. No changes are recommended to the current fully allocated cost standards. The recommended marginal cost standards, presented in Table 24, were developed by multiplying the fully allocated cost standards by 50.1 percent, or the ratio of the systemwide marginal cost per passenger-trip to the systemwide fully allocated operating cost per passenger-trip. The standards for operating cost per passenger-trip should continue to be adjusted throughout the planning period based on the CPI Adjusted Rolling Average.
- **Farebox Recovery Ratio** – The California TDA previously required that all funding recipients achieve minimum farebox recovery standards, although these requirements have not been enforced since the COVID-19 pandemic. It is recommended that the MTA and senior center programs strive to achieve system/program farebox recovery ratios of 10 percent, the previous minimum standard for rural transit agencies. MTA and the senior centers should include local support (which includes FTA funds) when calculating farebox values.

Carbon Neutrality Standards

The MTA previously adopted standards to help support the agency's goal of carbon-neutral transportation operations. These standards are shown in Table 25 and listed below. No changes to the MTA's carbon neutrality standards are recommended at this time.

- **Reduction in gallons of diesel fuel and gasoline consumed** – MTA should strive to continuously reduce the amount of diesel fuel and gasoline consumed compared to the agency's FY 2007-08 baseline.
- **Reduction in fossil fuels consumed for electricity and heating** – MTA should strive to continuously reduce the number of fossil fuels used to provide electricity and heating to its various facilities compared to the agency's FY 2007-08 baseline.

Service Reliability Standards

It is recommended that MTA adopt and track seven performance standards to ensure the agency is upholding its policies regarding service reliability, safety, and capital upgrades. These performance standards are shown in Table 25 and summarized below.

- **Service Delivery Rate** – The MTA should strive for at least 95 percent, preferably 100 percent, of scheduled trips to be completed. Scheduled trips include fixed routes, paratransit, and on-demand trips.
- **ADA Paratransit Trip Denial Rate** – The MTA should continue to have a zero percent ADA paratransit trip denial rate. This means the MTA should continue to maintain enough resources to be able to complete every requested ADA trip.
- **On-Time Performance** – The MTA should work to achieve a minimum standard of 80 percent of trips being made on time, with a target standard of 90 percent. On-time trips, for fixed routes, refer to buses that leave timed stops at 0 to 5 minutes after the published scheduled time. On-time trips, for paratransit or on-demand, refer to pick-ups made within 30 minutes of the passenger's requested pick-up.

Table 25: Recommended MTA Performance Standards - Reliability and Carbon Neutrality

Reliability		
Measure	Recommended Standards	
	Minimum	Target
Service Delivery Rate ¹	95%	100%
ADA Paratransit Trip Denial Rate	0%	0%
On-Time Performance ²	80%	90%
Road Calls ³	7.5 per 100,000 vehicle service miles	<5 per 100,000 vehicle service miles
Preventable Vehicle Collisions	1 per 100,000 vehicle service miles	0 per 100,000 vehicle service miles
Fleet Preventive Maintenance Ratio ⁴	80%	90%
Bus Spare Ratio ⁵	40%	50%

Carbon Neutrality	
Measure	Recommended Standards
Reduce gallons of diesel and gas consumed for operations compared to FY 2007-08	No Change
Reduce fossil fuels consumed for electricity and heating for facility operations compared to FY 2007-08	No Change

Note 1: Service delivery rate refers to the percentage of scheduled trips across all services that were completed.

Note 2: On-time performance refers to the percentage of fixed route trips that leave timed stops between 0 to 5 minutes after the time shown on the published schedule and the percentage of paratransit or on-demand pick-ups made within 30 minutes of the passenger's requested ride time.

Note 3: Road Calls refer to incidents where service is interrupted longer than 5 minutes due to mechanical failure.

Note 4: Fleet preventive maintenance ratio refers to the percent of maintenance within 10% of the scheduled mileage interval, or at least every 3 months

Note 5: Bus spare ratio refers to how many spare vehicles are needed compared to the size of the active fleet.

Sources: MCOG, MTA, LSC

- **Road Calls for Mechanical Failures** – The recommended minimum standard for road calls, or incidents where operations are interrupted for more than five minutes due to a mechanical failure, is 7.5 per 100,000 vehicle service miles. The target standard is less than 5 per 100,000 vehicle service miles.
- **Preventable Vehicle Collisions** – The recommended minimum standard for preventable vehicle collisions is 1 per 100,000 vehicle service miles. The target standard is 0.
- **Fleet Preventive Maintenance** – It is recommended the MTA work to complete 80 percent of vehicle maintenance requirements within 10 percent of the scheduled mileage interval, or at least every 3 months. The target standard is to complete 90 percent of maintenance within the scheduled mileage intervals.
- **Bus Spare Ratio** – MTA should maintain a spare vehicle fleet equal in size to 40 percent of the active vehicle fleet. The target standard is 50 percent.



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