



**CITY OF LOMPOC
CITY OF LOMPOC TRANSIT (COLT)
TITLE VI PROGRAM**

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CITY OF LOMPOC CITY OF LOMPOC TRANSIT (COLT) TITLE VI PROGRAM

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

INTRODUCTION

The purpose of this Title VI Program is to establish guidelines to effectively monitor and ensure that the City of Lompoc's (City) transit services (COLT), are in compliance with FTA Title VI requirements.

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

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

TITLE VI REQUIREMENTS

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

The City of Lompoc informs members of the public of their Title VI protection rights by advertising in the local paper and holding public hearings. The Title VI Complaint Process is provided in Exhibit C. A list of locations where notices are posted are listed on page 7. Additional information, including posting of a Title VI Notice to the Public and providing bilingual complaint procedures, as shown in Exhibits A and B. The City also provides a bilingual complaint form and posts a Title VI bilingual notice for public viewing at the Transit office, as shown in Exhibit A.

- 2. Requirement to Develop Title VI Complaint Procedures and Complaint Form.** The City is required to develop procedures for investigating and tracking Title VI complaints filed against the City and to make the procedures for filing a complaint available to the general public.

City of Lompoc Title VI Complaint Procedures

- Submission of Complaint: *If a customer believes he/she has received discriminatory treatment by COLT on the basis of race, color or national origin, the customer will have the right to file a complaint with the Transit Title VI Compliance Coordinator. The complaint must be filed no later than sixty (60) calendar days of the alleged discriminatory incident. Title VI complaint procedures included in Exhibit B are in both English and Spanish.*

- Investigation of Complaints

Upon receipt of the complaint, the Compliance Coordinator will begin an investigation. The investigation may include discussion(s) of the complaint with all affected parties to determine the problem. Based upon the information received, the Compliance Coordinator will prepare an investigation report for submittal to the Assistant Public Works Director. The complainant will receive a letter from the Compliance Coordinator stating the final decision within forty-five (45) calendar days of receipt of the complaint.

If more time is needed to review the complaint, the Compliance Coordinator will notify the complainant of the estimated time-frame for completing the review. Upon completion of the review, the Compliance Coordinator shall make a recommendation regarding the merit of the complaint, whether remedial actions are available to provide redress, and whether improvements to the City's Title VI process are needed.

- Request for Reconsideration

The complainant shall be notified of his/her right to appeal the decision. If the complainant disagrees with the Compliance Coordinator's finding, the complainant may request reconsideration by submitting a written request to the Assistant Public Works Director within ten (10) calendar days after receipt of the Compliance Coordinator's response. The complainant shall provide a detailed description of items not fully understood. The Assistant Public Works Director will notify the complainant of his/her decision either to accept or reject the request for reconsideration within ten (10) calendar days. When the Assistant Public Works Director agrees to reconsider the matter, the complaint shall be returned to the Compliance Coordinator for re-evaluation in accordance with the "Investigation of Complaint" procedures described above.

- Appeal Process

If the request for reconsideration is denied, the complainant may appeal the Assistant Public Works Director's response to the complaint by submitting a written request to the Compliance Coordinator. The appeal request will be forwarded to the City Manager and City Attorney for final determination.

- Submission of Complaint to the Department of Transportation

If the complainant is dissatisfied with the City's resolution of the complaint, he or she may submit a complaint to the Department of Transportation for investigation. In accordance with Chapter 9, Complaints, of FTA Circular 4702.1B, such a complaint must be filed within 180 calendar days after the date of the alleged discrimination. Chapter 9 of FTA Circular 4702.1B, which outlines the complaint process to the Department of Transportation, may be obtained by requesting a copy from the City's Compliance Coordinator at (805) 875-8268.

- 3. Requirement to Record and Report Transit-Related Title VI Investigations, Complaints, and Lawsuits.** The City is required to prepare and maintain a list of investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, and/or national origin in transit-related activities and programs and that pertain to the entity submitting the report, not necessarily the larger agency or department of which the entity is a part.

The City Title VI Transit Compliance Coordinator will maintain a list of Title VI investigations, complaints, and lawsuits utilizing the form shown in Exhibit D, including a comprehensive summary and description of actions taken by the City, as required by the Title VI regulations. The list shall include the date the investigation, lawsuit, or complaint was filed; a summary of the allegations(s); the status of the investigation; lawsuit, or complaint; and actions taken by the City in response, or final findings related to the investigation, lawsuit, or complaint. The list shall be included in the City's Title VI submittal to FTA every three years.

- 4. Promoting Inclusive Public Participation and Language Assistance Plan.** The City is required to develop a public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submission. The City also must have a language assistance plan for providing language assistance to persons with limited English proficiency (LEP).

The City's Public Participation Plan is reflected in the "City of Lompoc Transit Services title VI Limited English Proficiency (LEP) Plan" (June 2013) under "Outreach Techniques." The City's public participation activities, public meetings, and participation in community activities are described in the LEP Plan. City transit staff also participates in the development and updates to the Santa Barbara County Association of Governments (SBCAG) "Public Participation Plan" and coordinates and integrates its outreach efforts with SBCAG as needed.

The City's Language Assistance Plan is reflected in the City's LEP Plan and includes language assistance measures. The City's approach includes a number of options available to LEP persons, including both oral and written language services. Specific details are included in the City's LEP Plan in Exhibit E.

The City holds an Unmet Transit Needs workshop each fall in the City Council Chambers. In addition staff, as requested (as many as three times a year), speaks at public functions and provides published materials. City staff has, this year, provided materials at the Lompoc Senior Expo and the FOOD, FOOD, FOOD Expo.

- 5. Requirement to Provide Meaningful Access to LEP Persons.** Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP.

The City web site posts COLT schedules. The City's web site provides material in both English and Spanish. The City also provides easy access to bilingual (English and Spanish) administrative staff and drivers at the City's Transit office during operating

hours to answer questions during their regular shift schedules for those LEP passengers who utilize the City's bus system.

The City also collaborates with the Santa Barbara County Transportation Advisory Committee (SBCTAC), the Metropolitan Planning Organization (MPO), SBCAG, in its Unmet Transit Needs process. The Unmet Transit Needs hearings are accessible to the general public, offer bilingual translation, and are consistent with SBCAG's comprehensive Public Participation Plan and process that ensures meaningful access to LEP throughout the Santa Barbara County region.

- 6. Minority Representation on Planning and Advisory Bodies.** The City will encourage participation of minorities on committees, councils, or other bodies.
- 7. Requirement to Provide Additional Information upon Request.** At the discretion of the FTA, information other than that required by the referenced circular, may be requested in writing from a recipient in order to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI requirements.

The City of Lompoc Title VI Transit Compliance Coordinator will be available to provide additional information, as needed, and to respond to any verbal or written complaint.

- 8. Requirement to Develop System-Wide Standards and Policies.** FTA requires all fixed-route transit providers to develop quantitative service standards and policies for their fixed-route service. Individual public transportation providers may set standards that best reflect their local environment.

The City has developed service standards and policies for its fixed-route system, COLT, consistent with Title VI requirements. The standards are included in Exhibit F and include (a) passengers per mile; (b) passengers per revenue service hour; (c) on-time performance; and (d) service interruptions.

**EXHIBIT A
NOTICE TO THE PUBLIC AND LIST OF LOCATIONS**



**CITY OF LOMPOC
City of Lompoc Transit - COLT
Title VI Notice & Complaint Process**

The City of Lompoc is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964. Any person who believes that he or she has been subjected to discrimination under Title VI on the basis of race, color or national origin may file a Title VI complaint with the City within 60 calendar days from the date of the alleged discrimination. **Or request additional information.**

Complaints may be filed with the City in writing and may be addressed to:

Mr. Richard Fernbaugh
Title VI Compliance Coordinator
City of Lompoc
100 Civic Center Plaza
Lompoc, CA 93436

A copy of the Title VI Complaint Form (in English or Spanish) and additional information may be obtained from the City's web site at "www.cityoflompop.com" (under "Departments – Public Works – Transportation) or by calling 805-875-8268. The City will provide appropriate assistance to complainants who are limited in their ability to communicate in English.



CIUDAD DE LOMPOC
Ciudad de Lompoc
Título VI Noticia y Proceso de Quejas

La Ciudad de Lompoc, se compromete a garantizar que ninguna persona sea excluida de participar o denegar los beneficios de servicios basado por raza, color, linaje u origen nacional, según lo dispuesto en el Título VI de la Ley de Derechos Civiles de 1964. Cualquier persona que cree que él o ella ha sido objeto de discriminación en virtud del Título VI basado por raza, color u origen nacional puede presentar una queja del Título VI con la Ciudad dentro de 60 días del calendario a partir de la fecha de la supuesta discriminación.

Las quejas pueden ser presentadas en la Ciudad por escrito y pueden ser dirigidas

a:

Richard Fernbaugh
Coordinadora de Conformidad Titulo VI
Ciudad de Lompoc
100 Civic Center Plaza
Lompoc, CA 93436

Una copia del Título VI Formulario de Queja (en Inglés o Español) y la información adicional se puede obtener desde el sitio web de la Ciudad en www.cityoflompoc.com (en “Departamentos - ***Servicios administrativos - Vivienda***) o llamando al 805-875-8268. La Ciudad proveerá asistencia apropiada para los denunciantes que sean limitados en su capacidad de comunicarse en inglés.

**CITY OF LOMPOC
TITLE VI
LIST OF LOCATIONS**

The following is a list of locations where transit-related bilingual Title VI Public Notices are posted:

City of Lompoc
Transit Administrations Office
1300 Laurel Ave.
Lompoc, CA 93438

- City of Lompoc Web Site
- City of Lompoc, City Hall
- City of Lompoc, Library

EXHIBIT B
CITY OF Lompoc
CITY OF LOMPOC TRANSIT – (COLT)
Title VI Complaint Process

The City of Lompoc is committed to a policy of non-discrimination in the conduct of its business, including its Title VI responsibilities, and to the delivery of equitable and accessible transportation services. Any person who believes that he or she has been subjected to discrimination under Title VI on the basis of race, color or national origin may file a Title VI complaint with the City within 60 days from the date of the alleged discrimination.

Complaints may be filed with the City in writing and may be addressed to:

Mr. Richard Fernbaugh
Title VI Compliance Coordinator
City of Lompoc
100 Civic Center Plaza
Lompoc, CA 93436

Download a copy of the Title VI Complaint Form in the following languages:

(INSERT ENGLISH PDF)

(INSERT SPANISH PDF)

A copy of the Title VI Complaint Form may also be obtained by calling 805-875-8268. The City will provide appropriate assistance to complainants who are limited in their ability to communicate in English.

Title VI Transit Complaint Process

Once a complaint is received, it will be investigated by the Compliance Coordinator. In instances where additional information is needed, the Compliance Coordinator will contact the complainant by phone or in writing. Failure of the complainant to provide the requested information by a certain date may result in the administrative closure of the complaint or a delay in complaint resolution.

Based upon receipt of all the information required, the City will investigate a Title VI complaint within 45 days of receipt but will notify complainant if additional time is required. Receipt of additional relevant information and/or simultaneous filing of a complaint with the City and an external entity may expand the timing of the complaint resolution.

City of Lompoc Title VI Policy Statement

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

- Ensure that the level and quality of transportation service is provided without regard to race, color or national origin.

City of Lompoc – City of Lompoc Transit – (COLT)
Title VI Program

- Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations.
- Promote the full and fair participation of all affected populations in transportation decision making.
- Prevent the denial, reduction or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- Ensure meaningful access to programs and activities by persons with limited English proficiency (LEP).

For additional information on the City's non-discrimination obligations, please contact:

*Mr. Richard Fernbaugh
Title VI Compliance Coordinator
City of Lompoc
100 Civic Center Plaza
Lompoc, CA 93436
Phone: (805)875-8268*

**EXHIBIT C
CITY OF LOMPOC
CITY OF LOMPOC TRANSIT – (COLT)
Title VI Complaint Form**

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

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact the Title VI Compliance Coordinator at (805) 875-8268. The completed form must be returned to City of Lompoc, Title VI Compliance Coordinator, 100 Civic Center Plaza, Lompoc, CA 93436.

Name: _____

Street Address: _____

Phone: _____ Alternative Phone: _____

Date of Incident: _____ Time of Incident: _____

Which of the following best describes the reason for the alleged discrimination? (Check one)

____ Race

____ Color

____ National Origin (Limited English Proficiency)

Please describe the alleged discrimination incident. Explain what happened, whom you believe was responsible, and other specific relevant information. Please use the next page of this form if additional space is required.

(Complete next page of form)

**CITY OF LOMPOC
CITY OF LOMPOC TRANSIT – (COLT)
Title VI Complaint Form**

Have you filed a complaint with any other federal, state or local agencies (Check one)

_____ Yes _____ No

If yes, list agency or agencies and contact information below:

Agency: _____

Street Address: _____

Phone: _____

Contact Name: _____

Agency: _____

Street Address: _____

Phone: _____

Contact Name: _____

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

Complainant's Signature

Date

Print or Type Name of Complainant

Date Received: _____

Received By: _____

**CITY OF LOMPOC
CITY OF LOMPOC TRANSIT – (COLT)
Formulario de Quejas Titulo VI**

La Ciudad de Lompoc centra sus esfuerzos en garantizar que nadie sea excluido de la participación en sus servicios ni que nieguen los beneficios de estos, con base en raza, color u origen nacional, en conformidad con las disposiciones del Título VI de la Ley de Derechos Civiles de 1964 y enmiendas.

La información siguiente es necesaria para ayudarnos en el procesamiento de su queja. Si requiere ayuda para llenar este formulario, por favor de dirigirse al Título VI Coordinador de Cumplimiento, al teléfono (805) 875-8268. El formulario completo debe devolverse al Coordinador de Cumplimiento Titulo VI, Departamento de Becas, 100 Civic Center Plaza, Lompoc, CA 93436.

Nombre: _____

Dirección: _____

Teléfono: _____ Segundo Teléfono: _____

Fecha del incidente: _____ Hora del incidente: _____

¿Cuál de los siguientes describe mejor la razón por la supuesta discriminación? (Marque Uno)

_____ Raza

_____ Color

_____ Origen nacional

Por favor, describa el supuesto incidente de discriminación. Explique lo sucedido; quien considera que fue responsable; y otra información específica pertinente. (Por favor, use el reverso de este formulario si requiere espacio adicional.)

**EXHIBIT D
CITY OF LOMPOC
LIST OF TRANSIT-RELATED TITLE VI
INVESTIGATIONS, COMPLAINTS AND LAWSUITS**

Action	Date (Month, Day, Year)	Summary (basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
(None)				
Lawsuits				
(None)				
Complaints				
(None)				

**EXHIBIT E
CITY OF LOMPOC
TITLE VI LIMITED ENGLISH PROFICIENCY (LEP) PLAN
(Including Public Participation Plan and Language Assistance Plan)**

**City of Lompoc Transit Services
Limited English Proficiency (LEP) Plan
June 2022**

Introduction

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

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

Background

The City of Lompoc Transit Division administers the City of Lompoc Transit services (COLT) that are operated by a contract service provider. The current transit service provider is RMS Management Services, Inc.. The Lompoc City Council is the policymaking body for the system. The COLT services consist of a fixed route service and a Dial-a-Ride service (DAR). The COLT Transit Division has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by COLT. As defined by Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, and how to notify LEP persons that assistance is available.

In order to prepare this plan, COLT transit staff undertook the U.S. Department of Transportation (U.S. DOT) four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter the COLT transit programs, activities, or services.
2. The frequency with which LEP persons come in contact with COLT transit services programs, activities, or services.
3. The nature and importance of programs, activities, or services provided by the COLT transit services to the LEP population.
4. Resources available to the COLT Transit Division and overall cost to provide LEP assistance.

A summary of the results of the COLT transit services' four-factor analysis is in the following section.

Four-Factor Analysis

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

COLT transit services staff reviewed the 2010 U.S. Census and current population and determined that, out of a population of City of Lompoc 43,509 residents, 8,999 (20.7%) of City of Lompoc residents speak a language other than English. In the City of Lompoc 11,747 residents (27%) have limited English proficiency; that is, they speak English “not well” or “not at all”. In the City of Lompoc, of those persons with limited English proficiency, the majority speak Spanish.

2. The frequency with which LEP come in contact with COLT transit services programs, activities, or services.

All transit services are provided throughout the City. A high percentage of Hispanic/Latino individuals therefore come into contact with the program. On-board ridership surveys conducted by the City reflect that 50% of riders utilize COLT services three to five days per week; 23% one to two days per week; and 13% six days per week.

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

The largest geographic concentration of LEP individuals in the COLT transit services area is Spanish-speaking. On-board ridership surveys conducted by the City indicate that 48% are captive transit riders, and 15% could have made their trip by another means as a passenger. The key trip purposes indicated for trips were 54% for shopping; 23% for medical/dental; 27% for school; 7% for work; and 14% for other purposes.

4. The resources available to COLT Transit Division and overall cost to provide LEP assistance.

COLT transit staff has access to a variety of resources that can help in outreaching and providing LEP assistance at low or no cost. Community-based resources include:

- City of Lompoc Senior Center
- Santa Barbara County Transportation Advisory Committee (SBCTAC)
- SBCAG Board Unmet Transit Needs Process
- Santa Barbara County Social Services Department

- Community Action Partnership of Santa Barbara County

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

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

Identification of LEP Population

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

1. Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Have a staff person greet participants as they arrive to City of Lompoc transit-sponsored events. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
3. At City of Lompoc transit meetings and events, develop identification cards that indicate primary language spoken, as appropriate. This will assist the City in identifying language assistance needs for future events and meetings.
4. Survey vehicle operators and other front-line staff, like dispatchers, dial-a-ride schedulers, and service development planners on their experience concerning any contacts with LEP persons.
5. Network with local human services organizations (such as Social Services and Public Health) to assist in identifying LEP groups and individuals most in need of LEP assistance and to further facilitate dissemination of information about Lompoc's transit services.

Language Assistance Measures

There are plans for a number of language assistance options available to LEP persons, including both oral and written language services. There are also various ways in which City of Lompoc transit staff can respond to LEP persons, whether in person, by telephone, or in writing.

- Placement of statements in notices and publications that interpreter services are available for these meetings.
- Survey bus drivers and other front-line staff, like dispatchers, Dial-A-Ride schedulers, and service development planners on their experience concerning any contacts with LEP persons during the previous year.

- Post the City of Lompoc Transit Services Title VI Policy and LEP plan on the City of Lompoc website, www.cityoflompoc.com.
- When an interpreter is needed, for a language other than Spanish, in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers.

Outreach Techniques

When staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population. Interpreters will be available as needed. The City currently uses a variety of outreach approaches, as described below.

Public Outreach Activities

The City of Lompoc web site posts COLT schedules. The City's web site provides material in both English and Spanish. The City also provides easy access to bilingual (English and Spanish) administrative staff and drivers at the City's Transit office during operating hours to answer questions during their regular shift schedules for those LEP passengers who use the City's bus system.

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

Public Meetings

The City also collaborates with the Santa Barbara County Transportation Advisory Committee (SBCTAC), the Metropolitan Planning Organization (MPO) and the Santa Barbara County Association of Governments (SBCAG), in its Unmet Transit Needs process. The Unmet Transit Needs hearings are accessible to the general public, offer bilingual translation, and are consistent with SBCAG's comprehensive Public Participation Plan and process that ensures meaningful access to LEP throughout the Santa Barbara County region.

City transit staff also participates in the development of the SBCAG "Public Participation Plan." A series of meetings are conducted with participants from throughout the community.

Recommendations to maximize community involvement are reflected in this plan and adopted by the SBCAG Board.

Participation in Community Activities

The City engages in community activities that promote its transit services. These activities include functions where a broad cross-section of the community can access available transit information, including schedules, brochures and fliers.

Assurances

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

The City will post information on its web site and ensure that it reflects up to date information consistent with the requirements of 49 CFR Section 21.9(d).

Monitoring and Updating the LEP Plan

The City of Lompoc will update the LEP every 3 years as required by the FTA and as required by U.S. DOT. At a minimum, the plan will be reviewed and updated when more data from the 2020 U.S Census is available, or when it is clear that higher concentrations of LEP individuals are present in the City of Lompoc transit services area. Updates will include the following:

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

Availability of Title VI Plans and Procedures

The City of Lompoc LEP Plan and the Title VI Procedures are included in the City of Lompoc's website at www.cityoflompoc.com. Any person or agency with internet access will be able to access and download the plan from the City of Lompoc website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the Plan in translation which the City of Lompoc will provide, if feasible. Questions or comments regarding the LEP Plan may be submitted to the City of Lompoc Aviation/Transportation Division, Title VI Administrator:

City of Lompoc
Aviation/Transportation Division
100 Civic Center Plaza
Lompoc, CA 93436
Phone: (805) 875-8268
Fax: (805) 875-8368
Email: r_fernbaugh@ci.lompoc.ca.us

**EXHIBIT F
CITY OF LOMPOC
SYSTEM-WIDE SERVICE STANDARDS
COLT FIXED-ROUTE SYSTEM**

Background

FTA requires all fixed-route transit providers of public transportation to develop quantitative standards for the following indicators. Individual public transportation providers may establish their own standards.

Definitions

- Passengers Per Mile: Generally expressed as the ratio of passengers to the number of miles traveled per revenue hour.
- Passengers Per Revenue Hour: The number of passengers carried by the system each month divided by the total revenue hours provided that month.
- On-time performance for each mode: A measure of runs completed as scheduled.
- Service Availability: A measure of system accessibility for community residents.

Passengers Per Mile Standards

COLT's current passenger per mile standard is 0.43 passengers per mile. This standard is reviewed each year with adjustments based on prior year's performance.

Passengers Per Revenue Hour Standards

COLT's current passenger per revenue hour standard is 5.651 passengers per revenue hour. This standard is reviewed each year with adjustments based on prior year's performance.

On-Time Performance Standards

A vehicle is considered on time if it departs a scheduled timepoint no more than one minute early and no more than five minutes late. COLT's on-time performance objective is 90% or greater. The City of Lompoc continuously monitors on-time performance and system results are part of monthly performance reports covering all aspects of operations.

Service Availability Standards

The City of Lompoc's service availability standards will strive to ensure that 90% of residents in the service area are within one-half mile of bus service.

**EXHIBIT G
CITY OF LOMPOC
SYSTEM-WIDE SERVICE POLICIES
FIXED-ROUTE SYSTEM**

Background

FTA requires that all providers of fixed-route public transportation develop qualitative policies for the following procedures:

- Vehicle Assignment
- Transit Amenities

Policies

Vehicle Assignment Policy

A vehicle(s) will be assigned to each of the COLT fixed-routes such that the average age of the fleet serving each route does not exceed over three years beyond the FTA useful life standard of the assigned vehicle type.

All vehicles will be equipped with air conditioning.

All vehicles will be equipped with wheel chair lifts.

All vehicles will be equipped with bike racks.

The capacity of vehicles will be matched to the operating characteristics of the route.

Transit Amenities Policy

Installation of transit amenities along bus routes will be based on the number of passenger boardings at stops along those routes.