

JUNE 2022

TITLE VI PROGRAM REPORT



RCTC

**RIVERSIDE
COUNTY
TRANSPORTATION
COMMISSION**

4080 Lemon Street, 3rd Floor
Riverside, CA 92501

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Introduction and Purpose

Title VI of the Civil Rights Act of 1964 protects persons in the United States from being excluded from participation in, denied the benefits of, or subjected to discrimination on the basis of race, color, or national origin in any program or activity receiving federal financial assistance.

The Riverside County Transportation Commission (RCTC or Commission) is committed to ensuring that its services are delivered and implemented in accordance with Title VI and other non-discriminatory regulations from the state and federal levels. As a state recipient, RCTC complies with the guidelines set forth by the State of California's (State) Department of Transportation (Caltrans). Caltrans requires local agencies to adopt a non-discriminatory notice, grievance procedures, complaint form, and a Coordinator of the program. These were approved by the Commission on October 10, 2012 for implementing Title VI and Title II of the Americans with Disabilities Act (ADA). RCTC is also a recipient under the federal Department of Transportation (DOT). Under the DOT, the Federal Transit Administration (FTA) requirements for implementing Title VI include the adoption of a Title VI Program report pursuant to FTA Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*.

The purpose of this report is to certify RCTC's compliance with FTA Circular 4702.1B every three years. As stated in Chapter II, page 1 of the Circular, RCTC will ensure that Title VI compliance is carried out in all of its programs and services, whether federally-funded or not, *"Title VI covers all of the operations of covered entities without regard to whether specific portions of the covered program or activity are federally funded". In other words, a recipient may engage in activities not described in the Circular, such as ridesharing program, roadway incident response program, or other programs not funded by FTA, and those programs must also be administered in a nondiscriminatory manner."*

The Circular has general requirements for all recipients and additional guidelines for Fixed Route Transit Providers, States, and Metropolitan Planning Organizations (MPOs). As the Regional Transportation Planning Agency (RTPA) and County Transportation Commission (CTC), the following general requirements and guidelines apply:

- 1) Title VI Notice to the Public
- 2) Title VI Complaint Procedures
- 3) Title VI Complaint Form
- 4) List of transit-related Title VI investigations, complaints, or lawsuits
- 5) Public Participation Plan
- 6) Language Assistance Plan

- 7) A table depicting the membership on non-elected committees broken down by race
- 8) Monitoring procedures for Subrecipients
- 9) Title VI equity analysis for the site and location of facilities
- 10) Documentation that the governing board has reviewed and approved the Title VI Program

The following sections of this report document how the Commission is in compliance with each requirement.

Background of RCTC

The Commission was established in 1976 by the State to oversee the funding and coordination of all public transportation services within Riverside County. The governing body consists of all five members of the County Board of Supervisors, one elected official from each of the County's 28 cities, and one non-voting member appointed by the Governor of California. As the designated RTPA and CTC, its responsibilities include setting policies, establishing priorities, coordinating activities among the County's various transit operators and local jurisdictions.

The public is most familiar with RCTC for its capital projects and motorist aid services. The various regional capital projects that RCTC is involved in throughout the County include the following:

- ✓ 91 Express Lanes
- ✓ 15 Express Lanes
- ✓ 15/91 Express Lanes Connector
- ✓ Interstate 15 Interim Corridor Operations Project
- ✓ Interstate 15 Corridor Operations Project
- ✓ Interstate 15 Express Lanes Southern Extension
- ✓ State Route 91 Corridor Operations Project
- ✓ State Route 71/91 Interchange Project
- ✓ State Route 60 Truck Lanes Project
- ✓ Mid-County Parkway/Interstate 215 Placentia Avenue Interchange
- ✓ Interstate 15/Railroad Canyon Interchange Project
- ✓ Coachella Valley-San Geronio Pass Rail Corridor Service Project
- ✓ Riverside-Downtown Station Improvements Project
- ✓ Moreno Valley/March Field Station Improvements Project
- ✓ Santa Ana River Trail Extension Projects

The Commission also provides motorist aid services designed to expedite traffic flow. These services include the Service Authority for Freeway Emergencies (SAFE), a program that provides call box service for motorists; the Freeway Service Patrol (FSP), a roving tow truck service that assist motorists with disabled vehicles on the main highways of western Riverside County during peak rush hour traffic periods; and rideshare programs such as Inland Empire 511 (IE511), a traveler information system.

These programs and projects are funded with various local, state, and federal sources. Local funding sources consist of Measure A, the countywide sales tax; Debt proceeds, derived from issuing bonds; and Transportation Uniform Mitigation Fees (TUMF), derived from developer impact fees. State funding sources for projects are derived from the State Transportation Improvement Program (STIP). RCTC also receives apportionments of federal Surface Transportation Program (STP) and Congestion Mitigation Air Quality (CMAQ) funds from the Federal Highway Administration (FHWA); and FTA Sections 5307, 5309, 5337 formula funds.

In May 2018, the Commission expanded its Commuter Assistance Program to launch a new Vanpool subsidy program called VanClub for commuters who travel to a workplace in Western Riverside County. Vanpools can be especially effective in providing transportation options in areas that are hard to serve by transit and can be an amenity for employers to attract and retain their employees. Regardless of funding source, RCTC is committed to ensuring that its projects and services are delivered and implemented in a non-discriminatory manner.

Title VI Notice to the Public

Recipients must notify beneficiaries of protections under Title VI by posting a notice in public locations that confirms that the recipient complies with Title VI and provides instructions on how to file a Title VI complaint to RCTC and directly to the FTA.

The following notice is available on RCTC's website, RCTC owned Metrolink stations, and in the lobby of RCTC's offices at 4080 Lemon Street, 3rd Floor, Riverside, CA 92501.

RCTC 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 RCTC.

For more information on RCTC's Title VI program, and the procedures to file a complaint, contact (951) 787-7141; email ahake@RCTC.org; or visit our

administrative office at 4080 Lemon Street, 3rd Floor, Riverside, CA 92501. For more information, you may also visit our website at www.rctc.org for additional information and to download a complaint form under “About Us”.

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

*If information is needed in another language, contact (951) 787-7141.
Si se necesita la información en otro idioma, llame al (951) 787- 7141.*

The notice is considered a vital document and is available in Spanish, consistent with DOT limited-English proficient (LEP) guidance and RCTC’s Language Assistance Plan (LAP). The Spanish translation is also posted where English versions are located. See Appendix A for a complete English and Spanish version the Commission’s Title VI Notice, Procedures, and Complaint form.

Title VI Complaint Procedures and Complaint Form

Requirements stipulate that recipients 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 make this form available. RCTC’s Complaint Procedures and Complaint Form are provided in Appendix A.

Similar to the Non-Discrimination policy requirements of Caltrans, the Deputy Executive Director, Aaron Hake, has been identified as the Civil Rights Liaison and is the primary contact for addressing Title VI complaints. The procedures explain that any person, or group of persons, who believes that they have been subjected to discrimination on the basis of race, color, or national origin may file a complaint to RCTC, or directly to FTA. RCTC will render a decision within 15 days upon follow-up with the complainant. The Circular also requires that the recipient explicitly state that a complainant has the opportunity to submit a complaint directly to FTA and must provide the contact information for submitting a complaint.

These documents are available on RCTC’s website and at the front desk of RCTC’s offices at 4080 Lemon Street, 3rd Floor, Riverside, CA 92501. In addition to the public notice, the complaint procedures and form are considered vital documents and as such are available in Spanish, consistent with the DOT LEP Guidance and RCTC’s LAP.

List of Transit-Related Title VI Investigations, Complaints, or Lawsuits

FTA requires that files of investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, or national origin in transit-related activities and programs be maintained for three years and a list of cases be held for five years.

RCTC has not received any transit-related Title VI complaints, nor has it been involved in any transit-related Title VI investigations or lawsuits.

Public Participation Plan

Recipients are required to promote inclusive public participation and seek out and consider the needs and input of the general public, including interested parties and those traditionally underserved by existing transportation systems, such as minority and LEP persons.

The Public Participation Plan is the established process or plan that describes the proactive strategies, procedures, and desired outcomes of a recipient's public participation activities. RCTC developed its Public Participation Plan by considering the demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available to the Commission.

The Public Participation Plan is provided as Appendix B.

Language Assistance Plan

Recipients are required to take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of its programs or activities for LEP populations. FTA Circular 4702.1B details the components of the Language Assistance Plan, including the Four Factor Analysis, which provides a careful analysis of LEP persons that the recipient may encounter to determine the specific language services that are appropriate to provide.

RCTC undertook the Four Factor Analysis and developed appropriate language assistance planning based on the results. The Commission then developed a Language Assistance Plan to assist it in effectively implementing the requirements and communicating with LEP individuals.

The Language Assistance Plan is provided as Appendix C.

Membership of Non-Elected Committees and Councils

Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, in which the membership 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 or councils.

RCTC has one transit-related committee that is applicable to this requirement, the Citizens and Specialized Transit Advisory Committee (CSTAC). Section 99238 of the State Transportation Development Act (TDA) regulations requires the Commission to have a CSTAC as part of the oversight process in administering the TDA funds. The TDA allows stipulates the membership of this body:

- 1) One representative of a potential transit user 60 years of age and older;
- 2) One representative of a potential transit user who is disabled;
- 3) Two representatives of the social service providers for seniors; including one representative of a social service transportation provider, if one exists
- 4) Two representatives of the social service providers for the disabled, including one representative of a social service transportation provider, if one exists;
- 5) One representative of a social service provider for persons of limited means; and
- 6) Two representatives of a Consolidated Transportation Service Agency(s) designated as such pursuant to subdivision (a) of Section 15975 of the Government Code, including one representative from an operator, if one exists. The CSTAC serves the Commission by participating in the transit needs hearing and reviewing the Short-Range Transit Plans developed by public transit operators as part of the Commission's annual budget development process. Most importantly, the CSTAC provides a dialogue between citizen appointee representatives and the public transit and specialized transit programs of Riverside County around matters of mutual concern and provides the Commission with invaluable community feedback.

Appointments are for a three-year term and some are extended to ensure continuity of service for the CSTAC. The selection process of CSTAC members was broadly noticed in media, on the RCTC website, and in various outreach settings, including asking Commissioners for input and conducting individualized outreach to social service providers.

In 2019, CSTAC bylaws were revised to expand the committee membership to include more social service agencies and transit providers to develop a more robust network that is more representative of the various populations in the county. In 2021, 15 members were approved by the Commission.

Citizens and Specialized Transit Advisory Committee					
Race	Caucasian	Latino	African American	Asian American	Native American
CSTAC*	60.0%**	33.3%**	0%	0%	0%

*One CSTAC member did not respond.

**One member identified as both Caucasian and Latino.

Subrecipient Compliance

If a recipient is a primary recipient, which means any FTA recipient that extends federal financial assistance to a subrecipient, then it is required to ensure that subrecipients are complying with Title VI, including the submittal of a subrecipient's Title VI documents.

In the last three years, the Southern California Regional Rail Authority (SCRRA), better known as Metrolink, was a subrecipient. The Riverside Transit Agency was a subrecipient until July 2019. Both agencies are also direct recipients of FTA funds and submit a Title VI report directly. Per FTA Circular 4702.1B, Chapter III, page 11: *"When a subrecipient is also a direct recipient of FTA funds, that is, applies for funds directly from FTA in addition to receiving funds from a primary recipient, the subrecipient/direct recipient reports directly to FTA and the primary recipient/designated recipient is not responsible for monitoring compliance of that subrecipient."*

Title VI Equity Analysis for Determining the Site or Location of Facilities

This requirement stipulates that recipients should complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. The equity analysis must include:

- Outreach to persons potentially impacted by the siting of facilities.
- Comparison of the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.

The purpose of completing a Title VI analysis during the project development stage is to determine if a project will have disparate impacts on the basis of race, color, or national origin. If such impacts exist then the project may move forward with the proposed location if there is substantial legitimate justification for locating the project there, and there are no alternative locations that would have a less adverse impact on members of a group protected under Title VI.

For purposes of this requirement, the Circular states that “facilities” do not include bus shelters, as they are transit amenities and are covered under the additional requirements for fixed route transit operators, nor do they include transit stations, power substations, etc., as those are evaluated during project development and the National Environmental Policy Act (NEPA) process. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.

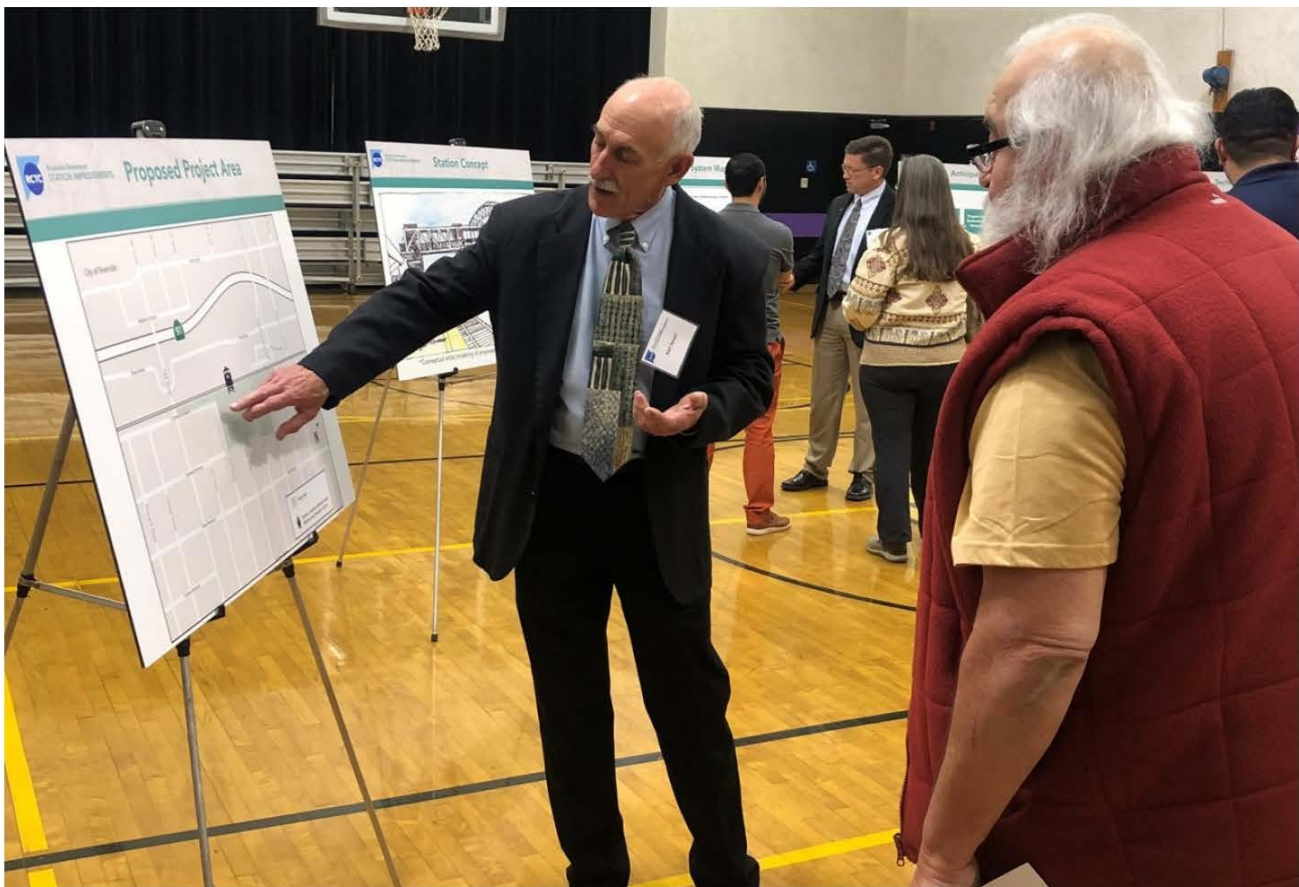
There have not been any projects in the last three years requiring an equity analysis.

Approval of the Title VI Program

All recipients are required to provide documentation such as meeting minutes, resolution, or other appropriate documentation showing that the governing body reviewed and approved the Title VI Program prior to submission to FTA. RCTC’s Title VI Program was reviewed and approved by the Budget and Implementation Committee on January 24, 2022, and forwarded to the full Commission for approval on February 9, 2022. Appendix D includes a copy of the meeting agenda and staff report.

APPENDIX B

TITLE VI PUBLIC PARTICIPATION PLAN



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I. Introduction

Background of the Riverside County Transportation Commission

The Commission was established in 1976 by the State of California (State) to oversee the funding and coordination of all public transportation services within Riverside County. The governing body consists of all five members of the County Board of Supervisors, one elected official from each of the County's 28 cities, and one non-voting member appointed by the Governor of California. It is the designated Regional Transportation Planning Agency (RTPA) and County Transportation Commission (CTC). Its responsibilities include setting policies, establishing priorities, coordinating activities among the County's various transit operators and local jurisdictions.

RCTC's capital projects, motorist aid services and transit-related programs and projects are funded with various local, state, and federal sources. Local funding sources consist of the Measure A, the countywide sales tax; debt proceeds derived from issuing bonds; and Transportation Uniform Mitigation Fees (TUMF) derived from developer impact fees. State funding sources for projects are derived from the State Transportation Improvement Program (STIP). RCTC also receives apportionments of federal Surface Transportation Program (STP) and Congestion Mitigation Air Quality (CMAQ) funds from the Federal Highway Administration (FHWA); and FTA Small Starts and Sections 5307, 5309, 5337 formula funds.

The Commission utilizes FTA funds for its VanClub program, station operations and capital projects, and county share of projects for the Southern California Regional Rail Authority (SCRRA or Metrolink).

Regardless of funding source, RCTC is committed to ensuring that its projects and services are delivered and implemented in a non-discriminatory manner.

Purpose of this Plan

This Public Participation Plan (Plan) is intended to satisfy Title VI requirements as expressed in FTA Circular 4702.1B. Recipients are required to promote inclusive public participation and seek out and consider the needs and input of the general public, including interested parties and those traditionally underserved by existing transportation systems, such as minority and Limited-English Proficient (LEP) persons.

The Public Participation Plan is the established process or plan that describes the proactive strategies, procedures, and desired outcomes of a recipient's public participation activities. This Plan will provide direction for the Commission's public processes by allowing public input for the planning process and for RCTC's programs, projects, and activities to all members of Riverside County, including citizens, organizations, and public agencies. Finally, it will develop specific strategies inclusive of low-income, minority, LEP populations, and underrepresented individuals.

RCTC developed this Plan by considering the demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available to the Commission.

Desired Outcomes

This Plan details RCTC's public participation goals, as well as strategies that will be implemented to assist meeting these goals. From these efforts, the Commission anticipates the following outcomes:

- Increased access to early, meaningful, and continual engagement in the transportation planning process for all individuals in Riverside County.
- Implementation of proactive strategies to bring enhanced awareness and increased access for minority individuals, LEP individuals, low-income individuals, and additional underrepresented and underserved individuals.
- Participation and representation from a diverse range of perspectives.

Federal and State Requirements

Title VI and Federal Authority

Title VI of the Civil Rights Act of 1964 protects persons in the United States from being excluded from participation in, denied the benefits of, or subjected to discrimination on the basis of race, color, or national origin in any program or activity receiving federal financial assistance. Under the DOT, the Federal Transit Administration (FTA) requirements for implementing Title VI include the adoption of a Title VI Program report, including a Public Participation Plan, pursuant to FTA Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*.

Public Hearing Requirements

Public hearing requirements may vary by project or program. The Commission may conduct a public hearing for a variety of reasons, such as approval of the Program of Projects under the Federal Transportation Improvement Program (FTIP); or to solicit public comments on the social and environmental effects of a proposed project that is funded with state and federal funds. Capital projects, for instance, will comply with Caltrans' Project Development Procedures Manual, Chapter 11 Public Hearing requirements; whereas, FTIP projects would follow the public participation requirements stipulated under the existing transportation legislation, Infrastructure Investment and Jobs Act

Public Participation Background

RCTC's traditionally seeks public involvement for both capital projects and transit-related projects.

The public is most familiar with RCTC for its capital projects. The various regional capital projects that RCTC is involved in throughout the County include the following:

- ✓ 91 Express Lanes
- ✓ 15 Express Lanes
- ✓ 15/91 Express Lanes Connector
- ✓ Interstate 15 Interim Corridor Operations Project
- ✓ Interstate 15 Corridor Operations Project
- ✓ Interstate 15 Express Lanes Southern Extension
- ✓ State Route 91 Corridor Operations Project
- ✓ State Route 71/91 Interchange Project
- ✓ State Route 60 Truck Lanes Project
- ✓ Mid-County Parkway/Interstate 215 Placentia Avenue Interchange
- ✓ Interstate 15/Railroad Canyon Interchange Project
- ✓ Coachella Valley-San Geronimo Pass Rail Corridor Service Project
- ✓ Riverside-Downtown Station Improvements Project
- ✓ Moreno Valley/March Field Station Improvements Project
- ✓ Santa Ana River Trail Extension Projects

A specialized outreach plan is designed for each project and may include community meetings, open houses, and formal public hearings.

Transit-related projects that involve public participation may include:

- Public Transit-Human Services Coordinated Plan Process
- The Citizen and Specialized Transit Advisory Committee
- Annual Transit Needs Hearing

II. Riverside County Demographics

Riverside County is the fourth largest county in California by area and population and is diverse in geography and demographics. According to the 2020 U.S. Census, Riverside County covers 7,208 square miles and has a population of 2,418,185.

Many of the populations important to this Plan – minority, underrepresented, and low-income individuals – are described in the American Community Survey's estimates. The 2010 and 2020 U.S. Census information were compared for population and race. The 2012 and 2019 ACS 5 Year Estimates were used to compare sex, age, poverty, disability, and homeowner status. By referring to the Census, the Commission has generated the following information to showcase county growth.

- Riverside County's population experienced a 10 percent increase between 2010 and 2020.
- American Indian population experienced an 85 percent growth while White alone experienced a 25 percent decline between 2010 and 2020
- Individuals with Hispanic or Latino origin increased by 21 percent between 2010 and 2020
- Between 2012 and 2019, the adult population ages 18 and over increased by more than 14 percent, adding 223,052 individuals. Adults represent 74 percent of the county's total population, numbering nearly 1.79 million people.
- The adult population age 65 or older has increased by nearly 30 percent, adding nearly 79,000 people. This group amounts to a total of almost 340,575 persons, representing 14.1 percent of the total county population.
- Younger seniors, ages 65 to 74, is the largest and fastest growing senior group, representing 36 percent of all seniors.
- Population in the percent below poverty level decreased by 3 percent since the 2012 ACS Estimates, representing 13 percent of the current entire population.
- Individuals with disabilities total 276,161, which represents 11 percent of the County's total population growing by 22% between 2012 and 2019.
- Owner occupied housing units declined by five percent while renter occupied housing increased by 12 percent

Minority Individuals

RCTC conducted demographic analysis of minority populations in the aggregate to understand where these communities are located throughout the County. FTA Title VI guidance defines a minority person as an individual of any of the following groups: American Indian and Alaskan Native, Asian, Black, or African American, Hispanic or Latino, Native Hawaiian or Other Pacific Islanders.

Demographic maps are provided in Attachment A, based upon minority population count tabulations developed for each Riverside County census tract. These were derived by subtracting the Caucasian population from each tract to arrive at the non-white, minority population counts. A summary of findings is provided below. This analysis was done at the Census Tract and Block Group levels using 2020 Decennial Census, which reflects the most current demographics.

- **Figure 1:** In Western Riverside County, there are pockets of minority populations throughout the region. The largest concentrations of minority populations, between 68.2% to 100% of the population at the Census block group level, are found along the western border of the County near Eastvale and Mira Loma, near Moreno Valley; east of Banning; and in the central portion of the region, near Perris.
- **Figure 2:** In East Riverside County, most of the region has a minority population of 50.9% to 68.1% of the total population at the block group level. A more concentrated minority population is located on the North Shore of the Salton Sea, Ripley and Palo Verde.
- **Figure 3:** Coachella Valley is also home to many minority persons, with the largest concentrations of minority persons located north of Cabazon, south of Cathedral City and Thousand Palms and south of Indio. In these pockets, minority persons make up 68.2 to 100% of the block group population of these areas.

LEP Individuals

As documented in RCTC’s Language Assistance Plan (LAP), Riverside County is home to many LEP populations, several of which meet the Department of Justice’s Safe Harbor provision. The Safe Harbor provision stipulates that written translation of vital documents for each eligible LEP language is to be provided if the group constitute 5% or 1,000 people, whichever is less, of the total population eligible to be served or likely to be affected or encountered. Such action will be considered strong evidence of compliance with the recipient’s written translation obligation. RCTC’s LAP details how RCTC will provide language assistance to these populations. This information is included here to detail the diverse populations that comprise Riverside County.

Table 1 below provides information from the 2019 American Community Survey 1-year Estimates, the most reliable and current Census source for accessing LEP information. There is a total of 42 LEP groups in Riverside County, numbering 312,657 individuals who speak English less than “very well” or 13.5 percent of Riverside County’s total population. The largest LEP group is Spanish speakers, who number 256,852 and comprise 11.1 percent of the County’s total population. LEP groups of more than 1,000 are highlighted in blue in Table 1 and include individuals who speak Persian, Hindi, Punjabi, Chinese, Korean, Vietnamese, Tagalog, Ilocano, Samoan, Hawaiian, or other Austronesian, Arabic, Other and unspecified languages. Besides Spanish, none of these LEP populations comprise 5% of the County’s total population.

A thorough analysis of LEP populations in the County was conducted to develop RCTC's Language Assistance Plan, consistent with FTA guidance. This analysis found that Spanish-speaking LEPs are the LEP population most frequently contacting RCTC and accessing RCTC's programs and services.

Table 1, Riverside County LEP Populations

Table B16001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER 2019 American Community Survey 1-Year Estimates	Estimate	% to Total # of Population	Margin of Error
Total:	2,314,507		243
Speak only English	1,356,095	58.6%	18705
Spanish: Speak English less than "very well"	256,852	11.1%	10799
French (incl. Cajun): Speak English less than "very well"	582	0.0%	323
Haitian: Speak English less than "very well"	63	0.0%	106
Italian: Speak English less than "very well"	383	0.0%	314
Portuguese: Speak English less than "very well"	334	0.0%	227
German: Speak English less than "very well"	302	0.0%	280
Yiddish, Pennsylvania Dutch or other West Germanic languages: Speak English less than "very well"	42	0.0%	70
Greek: Speak English less than "very well"	461	0.0%	643
Russian: Speak English less than "very well"	699	0.0%	511
Polish: Speak English less than "very well"	469	0.0%	418
Serbo-Croatian: Speak English less than "very well"	310	0.0%	331
Ukrainian or other Slavic languages: Speak English less than "very well"	273	0.0%	345
Armenian: Speak English less than "very well"	180	0.0%	152
Persian (incl. Farsi, Dari): Speak English less than "very well"	1,479	0.1%	740
Gujarati: Speak English less than "very well"	456	0.0%	353

Table B16001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER 2019 American Community Survey 1-Year Estimates	Estimate	% to Total # of Population	Margin of Error
Hindi: Speak English less than "very well"	1,645	0.1%	1355
Urdu: Speak English less than "very well"	971	0.0%	592
Punjabi: Speak English less than "very well"	1,397	0.1%	928
Bengali: Speak English less than "very well"	-	0.0%	216
Nepali, Marathi, or other Indic languages: Speak English less than "very well"	121	0.0%	146
Other Indo-European languages: Speak English less than "very well"	995	0.0%	580
Telugu: Speak English less than "very well"	70	0.0%	118
Tamil: Speak English less than "very well"	452	0.0%	593
Malayalam, Kannada, or other Dravidian languages: Speak English less than "very well"	-	0.0%	216
Chinese (incl. Mandarin, Cantonese): Speak English less than "very well"	11,837	0.5%	2899
Japanese: Speak English less than "very well"	644	0.0%	425
Korean: Speak English less than "very well"	4,223	0.2%	1653
Hmong: Speak English less than "very well"	81	0.0%	135
Vietnamese: Speak English less than "very well"	7,242	0.3%	1917
Khmer: Speak English less than "very well"	777	0.0%	536
Thai, Lao, or other Tai-Kadai languages: Speak English less than "very well"	976	0.0%	524
Other languages of Asia: Speak English less than "very well"	311	0.0%	324
Tagalog (incl. Filipino): Speak English less than "very well"	10,094	0.4%	2120

Table B16001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER 2019 American Community Survey 1-Year Estimates	Estimate	% to Total # of Population	Margin of Error
Ilocano, Samoan, Hawaiian, or other Austronesian languages: Speak English less than "very well"	1,173	0.1%	717
Arabic: Speak English less than "very well"	4,009	0.2%	1844
Hebrew: Speak English less than "very well"	-	0.0%	216
Amharic, Somali, or other Afro-Asiatic languages: Speak English less than "very well"	227	0.0%	210
Yoruba, Twi, Igbo, or other languages of Western Africa: Speak English less than "very well"	420	0.0%	438
Swahili or other languages of Central, Eastern, and Southern Africa: Speak English less than "very well"	500	0.0%	536
Navajo: Speak English less than "very well"	-	0.0%	216
Other Native languages of North America: Speak English less than "very well"	-	0.0%	216
Other and unspecified languages: Speak English less than "very well"	1,607	0.1%	1586
Amharic, Somali, or other Afro-Asiatic languages: Speak English less than "very well"	227	0.0%	210

III. RCTC's Stakeholders

Stakeholders are individuals, groups, organizations, or agencies that may be directly or indirectly affected by a plan, recommendations of that plan, or a project. RCTC seeks to engage all stakeholders through its public participation efforts, particularly those who may be adversely affected or who may be denied benefit of a plan's recommendation(s).

Stakeholders include:

- General public, minority individuals, low-income individuals, LEP persons, persons with disabilities, and older adults;
- University and college students, including those from: California Baptist University, College of the Desert, La Sierra University, Moreno Valley College, Mt. San Jacinto College, Norco College, Palo

Verde College, Riverside Community College, California State University-San Bernardino-Palm Desert Campus, and University of California-Riverside;

- High school students throughout Riverside County;
- Non-profit organizations including Blindness Support Services, Care Connexus, Care-a-Van, CASA, Friends of Moreno Valley, Inland AIDS Project, Operation SafeHouse, among others;
- Public agencies including city governments and health and human services throughout Riverside County;
- Public transit operators: Corona Cruiser, City of Riverside Special Services, Palo Verde Valley Transit Agency, Riverside Transit Agency, SunLine Transit Agency, Banning Pass Transit, Beaumont Pass Transit; and
- Private organizations and businesses.

IV. Public Participation Strategies and Tools

Public Participation Goals and Strategies

This section details RCTC public participation strategies for achieving each goal.

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

Strategies

- Provide adequate public notice of public participation opportunities and activities and time for public review of regionally significant plans and documents.
- Use all channels of outreach for promoting public participation opportunities including RCTC's website and blog, the Citizen and Specialized Transit Advisory Committee (CSTAC), Southern California Associated Governments (SCAG), transit providers, news media, and social media.
- Evaluate plans, programs, and projects to determine the most appropriate and effective tools and strategies for public and agency involvement and outreach.
- Provide opportunities to comment on draft planning documents to affected agencies and parties.
- Make transportation planning documents available for viewing on the RCTC website and at key locations throughout the county, as appropriate.
- During the transportation planning process, conduct public meetings, open houses, and public hearings (virtual and in-person), as appropriate.
- Provide language interpreters (Spanish language; other languages upon request) at public meetings, open houses, and public hearings (virtual and in-person).

Goal 2: Ensure accessibility to the transportation planning process and information for all members of the community; ensure that a wide range of perspectives will be heard so that planning outcomes reflect the needs of the region's diverse communities.

Strategies

- Develop information materials that are easily understood and translated for appropriate audiences and make them accessible at meetings and on RCTC’s website.
- Make notices and announcements attractive and eye-catching.
- Plan workshops and/or public hearings at convenient venues and times across the region; ensure venues are accessible to the public.
- Plan workshops and/or public hearings in both virtual and in-person formats; use multiple communication tools to promote the hearings and engage with the public to expand accessibility for participants.
- When appropriate, provide information about regionally significant plans and projects to the local news media for distribution and promotion.
- Maintain the RCTC website with current transportation planning activities, including reports, plans, agendas, and minutes for RCTC Commission meetings.
- 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.
- When identifying locations for community outreach activities, prioritize locations that are accessible by public transit.
- Make every effort to accommodate requests for accessibility opportunities, including physical accessibility to public meetings as well as accessibility to information in LEP languages and alternative formats.
- Encourage early involvement in the transportation planning process by providing timely notification and access to information.
- Use citizen and/or agency advisory groups as a means of providing input to the transportation planning process.
- Identify key individuals, organizations, and community organizations that may be interested in or affected by a plan or program; include this list in any mail or email distribution.
- Collaborate with Riverside County transit providers to facilitate and promote public participation opportunities.
- Maintain the *Riverside County Transportation Network*, a list of key stakeholders updated on an annual basis. The 594 active contacts on the Network include non-profits, human and social services, private transportation companies, public agencies, specialized transit providers.

Goal 3: Engage and increase opportunities for participation for those traditionally underrepresented and or underserved, including low-income, minority, persons with disabilities, and Limited English Proficiency populations.

Strategies

- Make commenting on plans convenient and accessible to the public and stakeholders; enable comments to be made at public meetings and workshops, and via email or online commenting

forms.

- Offer vital information, such as notices and announcements, in alternate languages as appropriate and feasible. When considering translation and interpretation needs, the RCTC Language Assistance Plan will be consulted for strategies and procedures. Translated information shall be made available on the RCTC or project-specific website, at public meetings and workshops, and at key locations across the county as appropriate and feasible.
- Translated notices, announcements, and other vital information shall be posted on Riverside County transit operators' buses and at transfer centers, as is possible.
- When appropriate, use alternative media outlets that may target minority, LEP, or underserved segments of the community.
- Continue expanding the contact list with agencies, organizations and stakeholders that work with LEP communities.

Project Specific Public Participation

The project team, including Project Manager and public affairs staff, is responsible for developing an appropriate public participation plan or public outreach plan that describes the strategies that will be used to communicate key information to agencies, organizations, elected officials, residents, business operators, commuters, emergency responders, and other project stakeholders. Outreach activities will be integrated with the technical work program to provide information and incorporate ideas and feedback. The input that is received will facilitate fully informed decisions by RCTC Commissioners at key decision points. These plans will be specifically tailored to individual projects to reflect project area demographics, populations, and need. Plans will comply with Title VI requirements.

Title VI requirements, including strategies for engaging LEP individuals, will be documented in all bid-related materials.

Updating the Public Participation Plan

RCTC's public participation goals and strategies will be reviewed as needed and results will be considered in preparation of the three-year Title VI Program adoption. Based on the effectiveness of strategies and the potential changes to Riverside County's demographics and outreach resources, strategies may be modified, and new strategies may be added to enhance the public participation process.

The following indicators may be used in reviewing and determining the effectiveness of these goals and strategies.

- Number of newspaper ads, public notices
- Number of news releases and news articles
- Number of public meetings and workshops

- Number of participants at public meetings, open houses, and public hearings
- Number of visits to the RCTC website and project-specific webpages
- Number of followers of social media pages, and volume of reach and engagement
- Number of comments received during the public comment period for projects and programs
- Number of requests for translated materials
- Number and content of materials translated
- Revisions to plans or projects based on public and agency input; analysis of how comments influenced the planning process

V. Summary of Public Participation Activities

FTA Title VI guidance requires a summary of outreach efforts made since the last Title VI Program submission. The following is a summary of transit-related and capital project-related public outreach during this submittal period.

Transit-Related Public Participation

Annual Public Hearing on Transit Needs in Riverside County

As required by Section 99238.5 of the California Public Utilities Code, RCTC holds at least one annual public hearing to solicit input from transit dependent and transit disadvantaged persons. The public hearing is promoted through newspaper articles throughout Riverside County, flyers on buses, public noticing on the County building, electronic promotion through email and social media websites, all printed in both English and Spanish. Written and oral comments provided at the hearing were used by RCTC and the County's transit operators in identifying transit needs in preparation of transportation plans and programs, including the Regional Transportation Plan and Short-Range Transit Plans. Comments are shared with transit and paratransit operators as they relate to operating issues and needs. Additionally, comments are also shared with other agencies that provide transportation services to transit-dependent populations, including the Coordinated Transportation Services Agencies and the County Office on Aging, and specialized transit providers such as Care-A-Van, Forest Folk, and Operation SafeHouse. The public hearings were held during the following dates:

- 2021 Public Hearing, August 9, 2021 via Video/teleconference
- 2020 Public Hearing, December 7, 2020 via Video/teleconference
- 2019 Public Hearing, July 9, 2019 at RCTC Offices

Coordinated Plan 2021 Outreach

The Coordinated Plan 2021 outreach efforts used a three-phased approach to ensure the process captured a wide range of audiences. The three phases included:

- Phase I Agency Interviews – April and May 2020
- Phase II Countywide E-Survey – July 2020
- Phase III Virtual Workshop and Open House – October 2020

The outreach approach invited comments regarding transportation needs from transit users and potential transit users, agency staff working with the target populations, and the public. Phase 1 of the Coordinated Plan’s outreach process commenced with human service agency interviews to develop a picture of mobility needs and gaps of target group members that informs both the overall study and the Phase II countywide e-survey. Phase II outreach established more quantitative input via an online survey, which was developed to quantify selected issues raised in stakeholder interviews. The survey was designed to invite responses from agency staff and from members of the public. The e-survey link was widely promoted through RCTC’s website and social media, stakeholder agencies, including those interviewed and RCTC’s network of stakeholders, and Riverside County transit operators. A total of approximately 965 surveys were received. Phase III Virtual Workshop and Open House invited comments upon and assistance in prioritizing strategies responsive to needs. During the weeklong open house community members, target population groups and agency stakeholders were invited to visit the project website to learn about project findings, attend an interactive, virtual workshop on Coordinated Plan strategies, rate the strategies’ priority, and provide written comments.

Citizens and Specialized Transit Advisory Committee (CSTAC)

The CSTAC serves as RCTC’s Social Services Transportation Advisory Council (SSTAC) to assist the Commission in complying with Transportation Development Act (TDA) Section 99238. The TDA provides direction for administering both Local Transportation Fund and State Transit Assistance funds for bus and commuter rail services. This funding promotes transportation service improvements and enhancements that support the mobility of older adults, persons with disabilities, and persons of limited means.

Additionally, the role of CSTAC members is to establish an effective communication exchange among Riverside County’s public transit operators, its specialized transportation providers, and representatives of its transit dependent population regarding matters of mutual concern. This group meets biannually, or, as necessary.

Riverside County Transportation Network

The *Riverside County Transportation Network* is a list of key stakeholders and includes agencies and organizations. The 594 active contacts are non-profits, human and social services, private transportation companies, public agencies, specialized transit providers that work with a diverse range of clients throughout Riverside County. The Network is updated on an annual basis, through a mail survey and online e-survey. Transit-Related information, notices, announcements—particularly public participation opportunities—are sent to this Network via emails and physical mail, when those addresses exist.

Capital-Related Public Participation

RCTC has a robust public participation and outreach component for its major capital highway and rail projects. Many of these efforts focus on transparency to allow the public to engage in projects via meetings, helpline, project webpages, and various social media platforms.

Since the last Title VI Program submission, the following RCTC transit-related projects held public engagements:

- Metrolink Downtown Riverside Expansion Project
- Coachella Valley-San Gorgonio Pass Rail Corridor Service – Tier 1 Environmental Impact Statement/Environmental Impact Report (non-FTA funded project)

RCTC maintains webpages for all its capital projects including transit and highways. These webpages are available in the “Projects” section of the RCTC website, rctc.org.

Active capital projects also produce collateral material in English and Spanish and hold community meetings with bilingual staff in attendance. To date, staff has not received requests for or encountered people who require translation or interpretation to languages other than Spanish.

RCTC’s Website

RCTC’s website includes current information and notices for all projects and activities. Website addresses are provided on all printed materials.

The Commission also maintains active Facebook, Twitter, and Instagram pages to enhance its public outreach. These social media pages provide information about public meetings, transit options, capital project updates, and other items of interest to Riverside County residents and the transportation industry. RCTC regularly boosts posts and places digital social media ads and polls to expand its reach to specific communities.

VI. Contact information

RCTC posts Title VI general notices and complaint forms on its website at www.rctc.org/about. The Plan may be translated in any language for free upon request. Any questions or comments regarding this Plan should be directed to:

Riverside County Transportation Commission
Aaron Hake, Deputy Executive Director 4080
Lemon Street, Third Floor
P. O. Box 12008
Riverside, CA 92502-2208
Phone: (951) 787-7141
Email: ahake@rctc.org

VII. Attachments

Demographic Maps of Minority Populations in Riverside County

Figure 1: Western Riverside County Minority Population

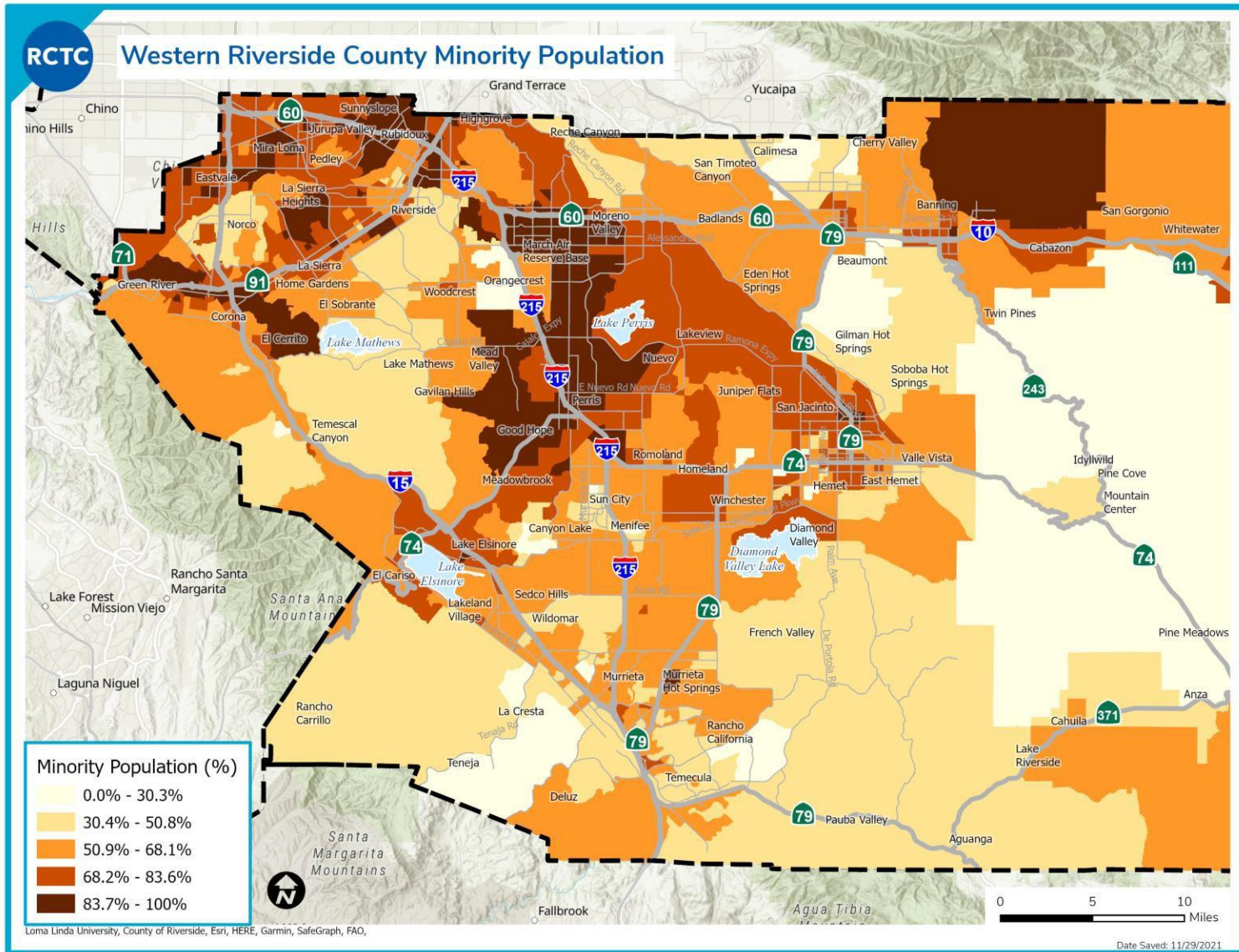


Figure 2: Coachella Valley Minority Population

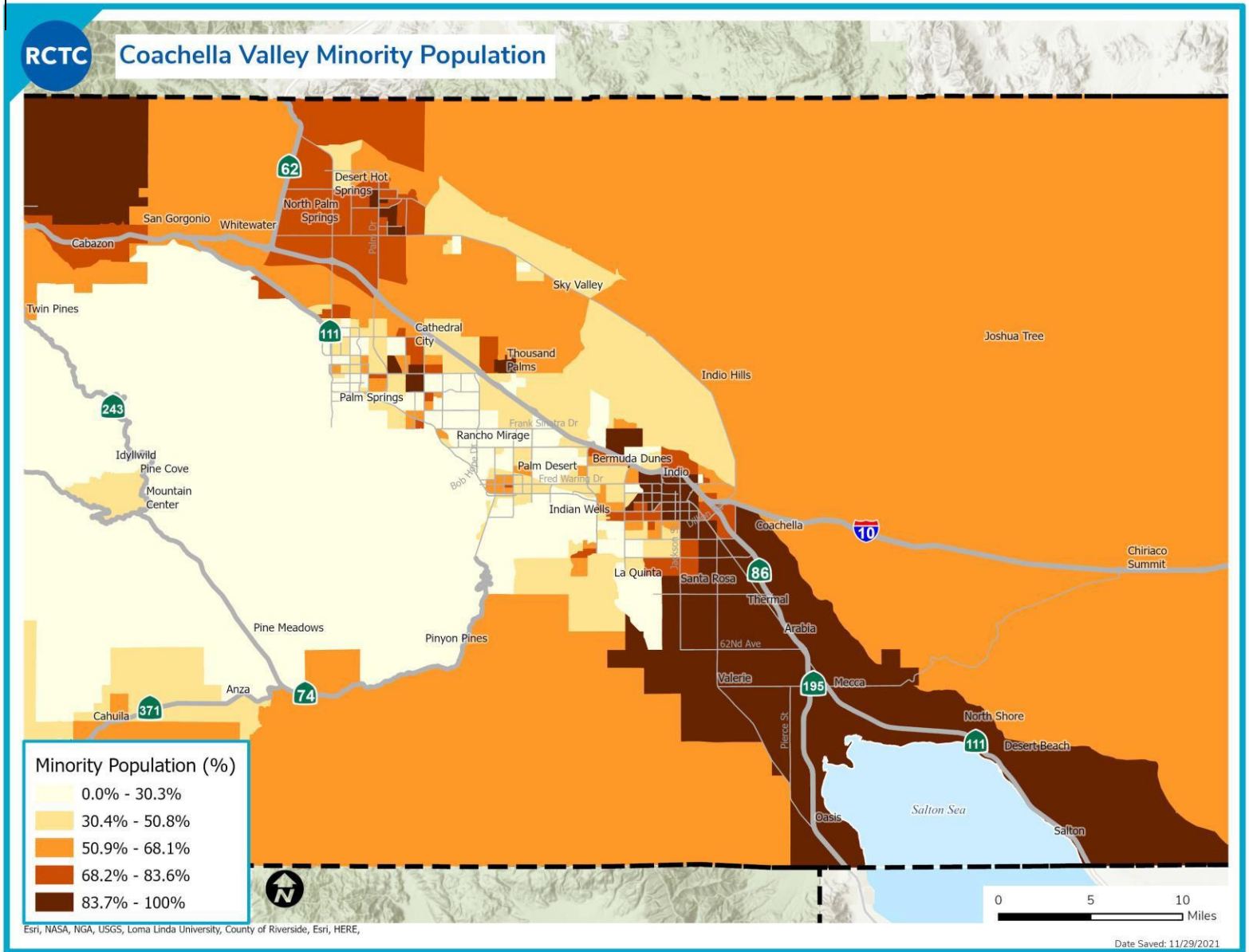
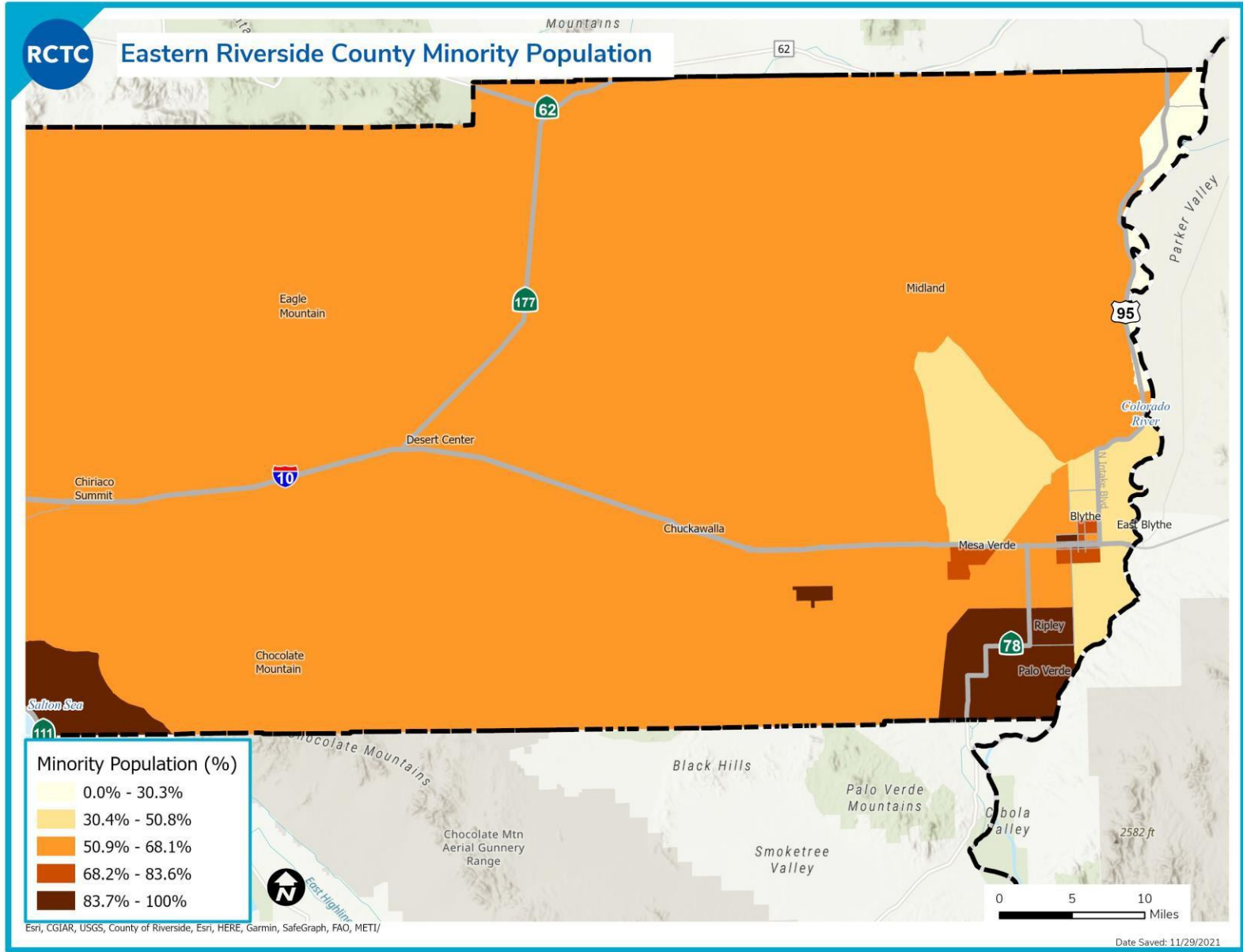


Figure 3: East Riverside County Minority Populati



APPENDIX C

TITLE VI LANGUAGE ASSISTANCE PLAN



**RIVERSIDE
COUNTY
TRANSPORTATION
COMMISSION**

4080 Lemon Street, 3rd Floor
Riverside, CA 92501

If information is needed in another language, please contact (951) 787-7141 for free translation services.
Si se necesita este documento en Español, llame al 951-787-7141 para servicios de traducción gratuitos.

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I. Introduction

Background of the Riverside County Transportation Commission

The Riverside County Transportation Commission (RCTC or “Commission”) was established in 1976 by the State of California (State) to oversee the funding and coordination of all public transportation services within Riverside County. The governing body consists of all five members of the County Board of Supervisors, one elected official from each of the County’s 28 cities, and one non-voting member appointed by the Governor of California. It is the designated Regional Transportation Planning Agency (RTPA) and County Transportation Commission (CTC). Its responsibilities include setting policies, establishing priorities, coordinating activities among the County’s various transit operators and local jurisdictions.

The public is most familiar with RCTC for its involvement in delivering capital projects and motorist aid services including the following:

- ✓ 91 Express Lanes
- ✓ 15 Express Lanes
- ✓ 15/91 Express Lanes Connector
- ✓ Interstate 15 Interim Corridor Operations Project
- ✓ Interstate 15 Corridor Operations Project
- ✓ Interstate 15 Express Lanes Southern Extension
- ✓ State Route 91 Corridor Operations Project
- ✓ State Route 71/91 Interchange Project
- ✓ State Route 60 Truck Lanes Project
- ✓ Mid-County Parkway/Interstate 215 Placentia Avenue Interchange
- ✓ Interstate 15/Railroad Canyon Interchange Project
- ✓ Coachella Valley-San Geronio Pass Rail Corridor Service Project
- ✓ Riverside-Downtown Station Improvements Project
- ✓ Moreno Valley/March Field Station Improvements Project
- ✓ Santa Ana River Trail Extension Projects

The Commission also provides motorist aid services designed to expedite traffic flow. These services include the Service Authority for Freeway Emergencies (SAFE), a program that provides call box service for motorists; the Freeway Service Patrol (FSP), a roving tow truck service that assist motorists with disabled vehicles on the main highways of western Riverside County during peak rush hour traffic periods; and rideshare programs such as Inland Empire 511 (IE511), a traveler information system.

These programs and projects are funded with various local, state, and federal sources. Local funding sources consist of Measure A, the countywide sales tax; Debt proceeds, derived from issuing bonds; and Transportation Uniform Mitigation Fees (TUMF), derived from developer impact fees. State funding

sources for projects are derived from the State Transportation Improvement Program (STIP). RCTC also receives apportionments of federal Surface Transportation Program (STP) and Congestion Mitigation Air Quality (CMAQ) funds from the Federal Highway Administration (FHWA); and FTA Sections 5307, 5309, 5337 formula funds. Additionally, the Commission was also awarded an FTA Small Starts grant for the Perris Valley Line. The Commission utilizes FTA funds for its VanClub program, station operations and capital projects, and transfer to the Southern California Regional Rail Authority (SCRRA or Metrolink).

Regardless of funding source, RCTC is committed to ensuring that its projects and services are delivered and implemented in a non-discriminatory manner.

Purpose of this Plan

The Language Assistance Plan (LAP) is intended to satisfy FTA Title VI requirements related to limited-English Proficient (LEP) individuals. FTA Circular 4702.1B states that “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).” LEP persons refer to those for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The LAP details the process by which RCTC will provide access to LEP individuals and the larger community. RCTC utilized the U.S. Department of Transportation’s (DOT) LEP Guidance Handbook and performed a Four Factor Analysis to develop this LAP.

Title VI and Federal Authority

Title VI of the Civil Rights Act of 1964 protects persons in the United States from being excluded from participation in, denied the benefits of, or subjected to discrimination on the basis of race, color, or national origin in any program or activity receiving federal financial assistance. Under the DOT, FTA’s requirements for implementing Title VI include the adoption of a Title VI Program report pursuant to FTA Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*. As a recipient of FTA Funds, RCTC has developed its own Language Assistance Plan in compliance with FTA Circular 4702.1B and through consultation with the FTA’s Office of Civil Rights’ LEP Guidance Handbook: *The FTA’s Office of Civil Rights’ Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers* (April 13, 2007).

Language Assistance Goals

The following goals will guide RCTC in ensuring that projects and services are delivered and implemented in a non-discriminatory manner:

1. Ensure meaningful access to all individuals regardless of race, color, national origin, and language of origin through outreach to LEP populations, translation of vital documents into LEP languages, and provision of additional language assistance services, as required;
2. Monitor changing LEP population demographics as necessary to ensure RCTC provides appropriate language assistance services;
3. Update this Language Assistance Plan as necessary to ensure the effectiveness of strategies for providing language assistance.

II. Four Factor Analysis

Recipients are required to take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of its programs or activities for persons who are limited-English proficient (LEP). FTA Circular 4702.1B details the components of the LAP, including the Four Factor Analysis, which provides a careful analysis of LEP individuals the recipient may encounter to determine the specific language services that are appropriate to provide.

The Four Factor Analysis balances the following factors:

- Factor One: The number and proportion of LEP persons in the jurisdiction;
- Factor Two: How often LEP persons come into contact with RCTC services;
- Factor Three: How important RCTC's services are to the lives of LEP persons;
- Factor Four: The resources available to RCTC for LEP outreach that reasonably can be provided.

The results of the four-factor analysis are used to determine the target LEP populations and the best methods of engaging with the public. RCTC undertook the Four Factor Analysis in order to develop an appropriate and effective Language Assistance Plan

Factor One: The number or proportion of LEP persons eligible to be served or likely to be encountered

RCTC's service area incorporates all Riverside County, which has a total population of 2,418,185 individuals according to the 2020 U.S. Census Bureau. The Census data was used for this analysis as it provides the most current and reliable information about LEP individuals. The Department of Justice's Safe Harbor provision, which was accepted by the FTA, stipulates that written translation of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, shall be considered strong evidence of compliance with the recipient's written translation obligation.

Table 1 below provides information from the 2019 American Community Survey 1-year Estimates demonstrating the 42 LEP populations in Riverside County, using 1-year estimates as they provide the most reliable data in terms of LEP populations. The largest group of LEP individuals is Spanish speakers, who comprise 11.1 percent of the County's population and number 256,852 individuals. Although no other LEP group reaches 5 percent of the population, 10 additional LEP groups have over 1,000 persons, which include: Persian, Hindi, Punjabi, Chinese, Korean, Vietnamese, Tagalog, Ilocano, Samoan, Hawaiian, or other Austronesian, Arabic, Other and unspecified languages.

Table 1: Riverside County LEP Populations

Table B16001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER 2019 American Community Survey 1-Year Estimates	Estimate	% to Total # of Population	Margin of Error
Total:	2,314,507		243
Speak only English	1,356,095	58.6%	18705
Spanish: Speak English less than "very well"	256,852	11.1%	10799
French (incl. Cajun): Speak English less than "very well"	582	0.0%	323
Haitian: Speak English less than "very well"	63	0.0%	106
Italian: Speak English less than "very well"	383	0.0%	314
Portuguese: Speak English less than "very well"	334	0.0%	227
German: Speak English less than "very well"	302	0.0%	280
Yiddish, Pennsylvania Dutch or other West Germanic languages: Speak English less than "very well"	42	0.0%	70
Greek: Speak English less than "very well"	461	0.0%	643
Russian: Speak English less than "very well"	699	0.0%	511
Polish: Speak English less than "very well"	469	0.0%	418
Serbo-Croatian: Speak English less than "very well"	310	0.0%	331
Ukrainian or other Slavic languages: Speak English less than "very well"	273	0.0%	345

Table B16001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER 2019 American Community Survey 1-Year Estimates	Estimate	% to Total # of Population	Margin of Error
Armenian: Speak English less than "very well"	180	0.0%	152
Persian (incl. Farsi, Dari): Speak English less than "very well"	1,479	0.1%	740
Gujarati: Speak English less than "very well"	456	0.0%	353
Hindi: Speak English less than "very well"	1,645	0.1%	1355
Urdu: Speak English less than "very well"	971	0.0%	592
Punjabi: Speak English less than "very well"	1,397	0.1%	928
Bengali: Speak English less than "very well"	-	0.0%	216
Nepali, Marathi, or other Indic languages: Speak English less than "very well"	121	0.0%	146
Other Indo-European languages: Speak English less than "very well"	995	0.0%	580
Telugu: Speak English less than "very well"	70	0.0%	118
Tamil: Speak English less than "very well"	452	0.0%	593
Malayalam, Kannada, or other Dravidian languages: Speak English less than "very well"	-	0.0%	216
Chinese (incl. Mandarin, Cantonese): Speak English less than "very well"	11,837	0.5%	2899
Japanese: Speak English less than "very well"	644	0.0%	425
Korean: Speak English less than "very well"	4,223	0.2%	1653
Hmong: Speak English less than "very well"	81	0.0%	135
Vietnamese: Speak English less than "very well"	7,242	0.3%	1917
Khmer: Speak English less than "very well"	777	0.0%	536

Table B16001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER 2019 American Community Survey 1-Year Estimates	Estimate	% to Total # of Population	Margin of Error
Thai, Lao, or other Tai-Kadai languages: Speak English less than "very well"	976	0.0%	524
Other languages of Asia: Speak English less than "very well"	311	0.0%	324
Tagalog (incl. Filipino): Speak English less than "very well"	10,094	0.4%	2120
Ilocano, Samoan, Hawaiian, or other Austronesian languages: Speak English less than "very well"	1,173	0.1%	717
Arabic: Speak English less than "very well"	4,009	0.2%	1844
Hebrew: Speak English less than "very well"	-	0.0%	216
Amharic, Somali, or other Afro-Asiatic languages: Speak English less than "very well"	227	0.0%	210
Yoruba, Twi, Igbo, or other languages of Western Africa: Speak English less than "very well"	420	0.0%	438
Swahili or other languages of Central, Eastern, and Southern Africa: Speak English less than "very well"	500	0.0%	536
Navajo: Speak English less than "very well"	-	0.0%	216
Other Native languages of North America: Speak English less than "very well"	-	0.0%	216
Other and unspecified languages: Speak English less than "very well"	1,607	0.1%	1586
Amharic, Somali, or other Afro-Asiatic languages: Speak English less than "very well"	227	0.0%	210

As all individuals residing in the county may be commuters, transit riders, and pedestrians, the total population is eligible to be served by the Commission's services. The following section addresses which LEP persons the Commission is likely to encounter based on the past frequency of contact.

Factor Two: The frequency with which LEP persons come into contact with the program

To identify and analyze the frequency with which LEP persons come into contact with these programs, a survey was distributed to staff who regularly and is more likely to interact with members of the public. The units that were surveyed include the Clerk of the Board, Public Affairs, Front Reception, Capital Projects, Commuter Assistance, and outreach consultants. The survey asked staff members about their experiences with LEP individuals, including how frequently they interacted with LEP persons, what languages the LEP individuals spoke, how successfully they communicated, and what information LEP persons were seeking.

Few respondents noted occasional interaction with LEP individuals in the three last year, the Front Receptionist, who encounters Spanish inquires few times a week and the external affairs staff and outreach consultants who encounter less than once a month. The most common requests are for information about transit services, RCTC project-specific construction information, and information about Metrolink services (not under the purview of the Commission). Staff members have been able to communicate with LEP individuals through assistance from bilingual staff members, translators, and through hand gestures and drawings. RCTC also has an on-call contract with PALS for Health, a translation/interpretation service based in southern California.

In conclusion, Factor Two identified that RCTC does not frequently come into contact with LEP individuals regarding its services and programs, but of those that are received, most are likely to speak Spanish.

Factor Three: The nature and importance of the program, activity, or service to people's lives

RCTC is a state-mandated countywide agency tasked with the funding and coordination of all public transportation services within Riverside County, which includes 28 cities, 7,208 square miles, and 2,418,185 individuals according to the 2020 U.S. Census Bureau. The Commission's mission is to assume a leadership role in improving mobility in the County and is responsible for setting policies, establishing priorities, and coordinating activities among the County's various transit operators and other agencies. The Commission also programs and/or reviews the allocation of federal, state, and local funds for highway, transit, rail, non-motorized travel (bicycle and pedestrian), and other transportation activities. The Commission serves as the tax authority and implementation agency for Measure A, the voter-approved half-cent sales tax for transportation improvements in Riverside County. The Commission also provides motorist aid services designed to expedite traffic flow. The Commission is also legally responsible for allocating Transportation Development Act (TDA) funds, the major source of funds for transit in the County. Furthermore, the Commission receives FTA funds for vanpool, station maintenance and capital projects, and Metrolink capital. The commission administers vanpool program known as Vanclub and commuter rail service operated by the Southern Californian Regional Rail Authority (SCRRA) better known as Metrolink.

RCTC works to ensure and improve the quality of life of Riverside County's residents. Transportation interacts with a variety of human needs including a safe environment with better air quality, a reduction in water runoff, reducing the levels of greenhouse gases, and supporting transportation alternatives that promote better health through walking or bicycling. By taking a more holistic approach, the importance of transportation grows larger and is valued as a vital necessity.

Factor Four: The resources available to the recipient for LEP outreach

RCTC has numerous resources available to ensure it provides meaningful access to LEP individuals. These include existing community partners, using its own resources, and using contracted services. These resources are detailed below:

- RCTC contracts with PALS for Health to provide written translation and oral interpretation for LEP individuals.
- Bilingual employees provide written translation and oral interpretation.
- "I Speak" language identification cards are used at the front desk and at public meetings.
- Language assistance information is provided on agendas and meeting notices.
- Public notices are translated into Spanish.
- RCTC may contract with public outreach firms that can provide language assistance as needed.
- Riverside County Transportation Network: This database ensures social service agencies and community organizations that work with LEP individuals are provided the Commission's information and notices to distribute to their clients.
- Citizens and Specialized Transit Advisory Committee: represent minority groups and are a useful resource for outreach to LEP individuals.
- Riverside County Transit Operators: RCTC may partner with transit operators to post vital information in English and Spanish on buses and at transfer locations.
- The Southern California Association of Government's LEP Plan, Public Participation Plan, and existing translated resources can provide materials for LEP outreach and communication.
- RCTC translates Title VI vital documents and project-specific vital information into Spanish.
- RCTC's website provides outreach and is equipped with a Google translator.

Discussion of Results

Census data analyzed in Factor One was consistent with the experience of RCTC staff members analyzed in Factor Two to determine that Spanish-speaking LEP individuals are the largest and most frequent LEP group that accesses RCTC's services and programs. As these individuals comprise 11.1 percent of Riverside County's population, it will be important for the Commission to continue providing vital documents in Spanish. Additional LEP groups are very small populations (less than 1 percent of the population), not yet identified (Other Indic Languages, for example), and do not frequently access the Commission's services or programs. Documents will be translated as requested or as is appropriate for a specific project. Details of language assistance services are provided in the following Implementation Plan.

III. Implementation Plan

Language Service Provision

RCTC will provide the following language assistance measures to ensure LEP individuals have full access to the Commissions services, programs, and activities:

Callers and Visitors

- Front desk staff have “I Speak” language identification cards available to assist LEP individuals.
- Several employees are bilingual and can help callers or visitors that speak Spanish.
- RCTC contracts with PALS for Health to provide written translation and oral interpretation for LEP individuals. RCTC requests in writing the material to be translated to Spanish, requests staffing for public meetings, or arranges for telephone translation services, upon request.

Translation of Vital Documents

FTA Circular 4702.1B defines vital documents as, “documents that provide access to essential services.” The Commission will use this definition when assessing what documents should be translated.

Title VI Documents are vital documents. The Title VI notice to the public, complaint form, and procedures are available in English and Spanish, the LEP language that RCTC is most likely to encounter. Vital documents are available on RCTC’s website and at the front desk. Information about the availability of free language assistance is available on posted notices and agendas in Spanish.

Spanish-Language Translation: RCTC provides project notices and announcements and vital documents in Spanish and will continue to do so, as the Spanish-speaking LEP population represents a significant portion of Riverside County’s population. Documents that are translated include: notices and announcements about public meetings and forums and public participation opportunities, key information distributed at project meetings, and any vital project-specific meetings.

Other LEP Language Translations: The additional LEP languages represent very small communities and vital information will be translated as requested and as appropriate, with decisions made on a project-by-project basis. For example, if a project takes place in a community with a large LEP population, key information for that project will be translated into that LEP language.

Oral Interpretation: Oral interpretation will be provided at public meetings as requested and appropriate. Decisions will be made on a project-by-project basis. Notices of public meetings and forums include information about how to request oral interpretation.

Outreach/Notice of Availability of Language Assistance RCTC's Title VI Notice to the Public publicizes its language assistance services. Additionally, other notices may include the statement, *"If information is needed in another language, please contact (951) 787-7141 for free translation services."*

Staff Training

Outreach and front desk staff are trained in assisting LEP individuals, including identifying language and using the language service provider interpretation system. Training is provided for new employees and reoccurs as necessary.

LEP training includes:

- A summary of RCTC's language assistance requirements DOT LEP Guidance;
- A summary of the Commission's language assistance plan; including responding to LEP persons
- Results of RCTC's Four Factor Analysis, including a summary of the LEP individuals in Riverside County and the frequency of contact between the LEP population and the Commission
- A description of the Commission's non-discrimination policies and practices.

IV. Monitoring, Evaluating, and Updating the LAP

A thorough review of the LAP will be undertaken every three years, or as necessary as guidelines are revised or as compliance reviews warrant. At that time, the LEP population will be reassessed to ensure all significant LEP languages are included in RCTC's language assistance efforts. The following reoccurring reporting and evaluation measures will be used to update the Language Assistance Plan:

1. RCTC will regularly assess the effectiveness of how the Commission communicates with LEP individuals by working with community stakeholders, such as the CSTAC, the Riverside Transit Network, County transit operators, non-profit agencies, and others.
2. Commission staff will track its language assistance efforts, including:
 - Tracking front desk staff interaction with LEP persons
 - Internal surveys of staff who are likely to engage with the public
 - Number of downloaded documents in other languages
 - Reports and updates from the language service provider
 - Requests for translation and interpretation

V. Contact information

RCTC will post the approved LAP on its website at www.rctc.org. The LAP may be translated in any language for free upon request.

Any questions or comments regarding the LAP should be directed to:

Riverside County Transportation Commission

Aaron Hake, Deputy Executive Director

4080 Lemon Street, Third Floor

P. O. Box 12008

Riverside, CA 92502-2208

Phone: (951) 787-7141

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