



# 2024-2026 TITLE VI PROGRAM

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Adopted by City of Corona Council >>>INSERT DATE<<<

## CITY OF CORONA TRANSIT SERVICE

### **Guiding Principle**

*City of Corona Transit Service desires to maintain a sustainable public transportation program that offers multiple transit options that are essential to ensuring uninterrupted mobility services in the community.*

### **Mission Statement**

*City of Corona Transit Service's mission is to provide a clean, safe, accessible, reliable and customer-friendly transportation system that improves the quality of life in the community.*

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## I. OVERVIEW

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### **Purpose**

Title VI of the Civil Rights Act of 1964 is a Federal law that prohibits recipients and subrecipients of Federal financial assistance (e.g., states, local governments, transit providers) from discriminating on the basis of race, color, or national origin in their programs or activities, and obligates Federal funding agencies to enforce compliance. Under Title VI, Department of Transportation (DOT) has the responsibility to provide oversight of recipients and to enforce their compliance with Title VI, to ensure that recipients do not use DOT funds to subsidize discrimination based on race, color, or national origin.

Per the FTA's Title VI Circular 4702.1B, October 1, 2012, as a recipient of Federal Transit Administration (FTA) funds, City of Corona Transit Service (CCTS) is required to prepare and submit a Title VI Program to their FTA regional civil rights officer once every three years. Title VI requires recipients of federal assistance to monitor and evaluate federally assisted programs for compliance. The FTA is responsible for ensuring compliance of transit agencies receiving federal assistance. The City of Corona receives federal assistance for the provision of public transit services and therefore complies with the Civil Rights Act of 1964 and the provision of Title VI. The 2024-2026 (2026) Title VI program reflects the City of Corona Transit Service's commitment to ensuring that no person shall, on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any City of Corona Transit Service program, activity, or service.

In this 2026 Title VI Program, CCTS has updated the 2021-2023 (2023) Title VI program to reflect any policy changes and includes the most recently available population and ridership data. The 2026 Title VI program supersedes CCTS's previously submitted Title VI Programs. The 2026 Title VI Program will become effective on the date it is approved by the City Council, prior to submittal to FTA.

### **Summary of Required Content**

This program was revised in conformance with FTA Title VI guidelines as referenced in FTA Circular 4702.1B, and as such, the Title VI Program includes the following General and Transit-specific requirements:

#### **A. General Requirements**

- Title VI Notice to the Public – Copy of the Title VI notice to the public that indicates compliance with Title VI and informs members of the public of the protections afforded to them by Title VI and a list of locations where the notice is posted.
- Title VI Complaint Procedures and Complaint Form – Copy of the agency's instructions to the public regarding how to file a Title VI discrimination complaint and a copy of the complaint form.
- List of transit-related Title VI investigations, complaints, and lawsuits – List of any public transportation-related Title VI investigations, complaints, or lawsuits files since the time of last submission.

- Public Participation Plan – A public participation plan that includes an outreach plan to engage minority and limited English proficient (LEP) populations as well as a summary of outreach efforts made since the last Title VI Program submission.
- Limited English proficiency (LEP) – Copy of the plan for providing language assistance to persons with limited English proficiency, based on the Department of Transportation (DOT) LEP Guidance.
- Racial Breakdown of Non-elected Advisory Council – Table depicting the racial breakdown of the membership of any transit-related, non-elected planning boards, advisory councils, etc. for which membership is selected by the recipient. (Provide a description of efforts made to encourage the participation of minorities on such committees or councils.)
- Subrecipient Monitoring – Narrative or description of efforts to ensure subrecipients are complying with the Title VI and a schedule of subrecipient Title VI Program Submissions.
- Title VI equity analysis – Copy of the Title VI equity analysis(es) conducted (with regard to facility location) during the planning stage of any new facility constructed since the last submission.
- Board of Directors Resolution or Meeting Minutes

**B. Requirements Scaled Based on the size of the of Fixed Route Transit Provider**

- System-wide service standards and policies for all transit providers
  - Service standards
    - Vehicle load for each mode
    - Vehicle headway for each mode
    - On time performance for each mode
    - Service availability for each mode
  - Service policies
    - Transit Amenities for each mode
    - Vehicle Assignment for each mode
- Requirements for transit providers who operate 50 or more fixed route vehicles in peak service (not applicable to City of Corona)
  - Collect and report data
  - Evaluate service and fare equity changes
  - Monitor transit service

## *II. CITY OF CORONA TRANSIT SERVICE*

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**A. BACKGROUND**

City of Corona is a suburban community located ~45 miles southeast of Los Angeles in western Riverside County, it is situated at the junction of two major freeways, the 91 and 15. The City limits encompass approximately 39.2 square miles with a population of over 164,000.

City of Corona Transit Service operates a demand response/paratransit Dial-A-Ride and fixed route service known as the Corona Cruiser. Dial-A-Ride service commenced in 1977 and provides curb-to-curb service throughout the City of Corona and neighboring county areas of Coronita, El Cerrito, and Home Gardens as well as satellite locations in the city of Norco. The complementary paratransit Dial-A-Ride service area

extends beyond city limits to ensure compliance with the Americans with Disabilities Act ¾ mile corridor around a Corona Cruiser fixed route. Door-to-door service is available upon request for riders certified under the Americans with Disabilities Act (see service area map – Figure 1).

Corona Cruiser fixed route service began in 2001 and serves the city-center as well as commercial, retail, and residential areas on the eastern and southern portion of the city. Fixed route service operates along two routes – the Red Line and Blue Line – using five buses during peak service.

The Blue Line serves the McKinley Street retail area, then travels on to Magnolia Avenue and Main Street to the River Road area. This route passes by many trip generators such as hospitals, medical facilities, schools, public service agencies, senior center, library, civic center, community center and commercial/retail areas. This route serves the following schools: Centennial High School, Corona Fundamental Intermediate School, and Lee Pollard High School. This route also serves the unincorporated area of Home Gardens. The Blue Line operates with a frequency of 60-67 minutes.

The Red Line connects the residential areas of central Corona with commercial and retail areas along Sixth Street and the Ontario Avenue/California Avenue industrial and retail area. The Red Line also covers South Corona along Ontario Avenue to , Temescal Canyon Road to serve the El Cerrito county area and The Crossings shopping complex at Cajalco Road. This route serves the following schools: Centennial High School, Corona High School and El Cerrito Middle School, as well as the library, community center and Corona Transit Center and North Main Corona Metrolink Station (on selected AM & PM trips). The service is extended to The Shops at Dos Lagos on Saturdays. The Red Line operates with a frequency of 50-66 minutes.

City of Corona Transit Service serves the City of Corona and neighboring incorporating Riverside County (see service area map – Figure 1).

The following public transit services are also available to Corona residents:

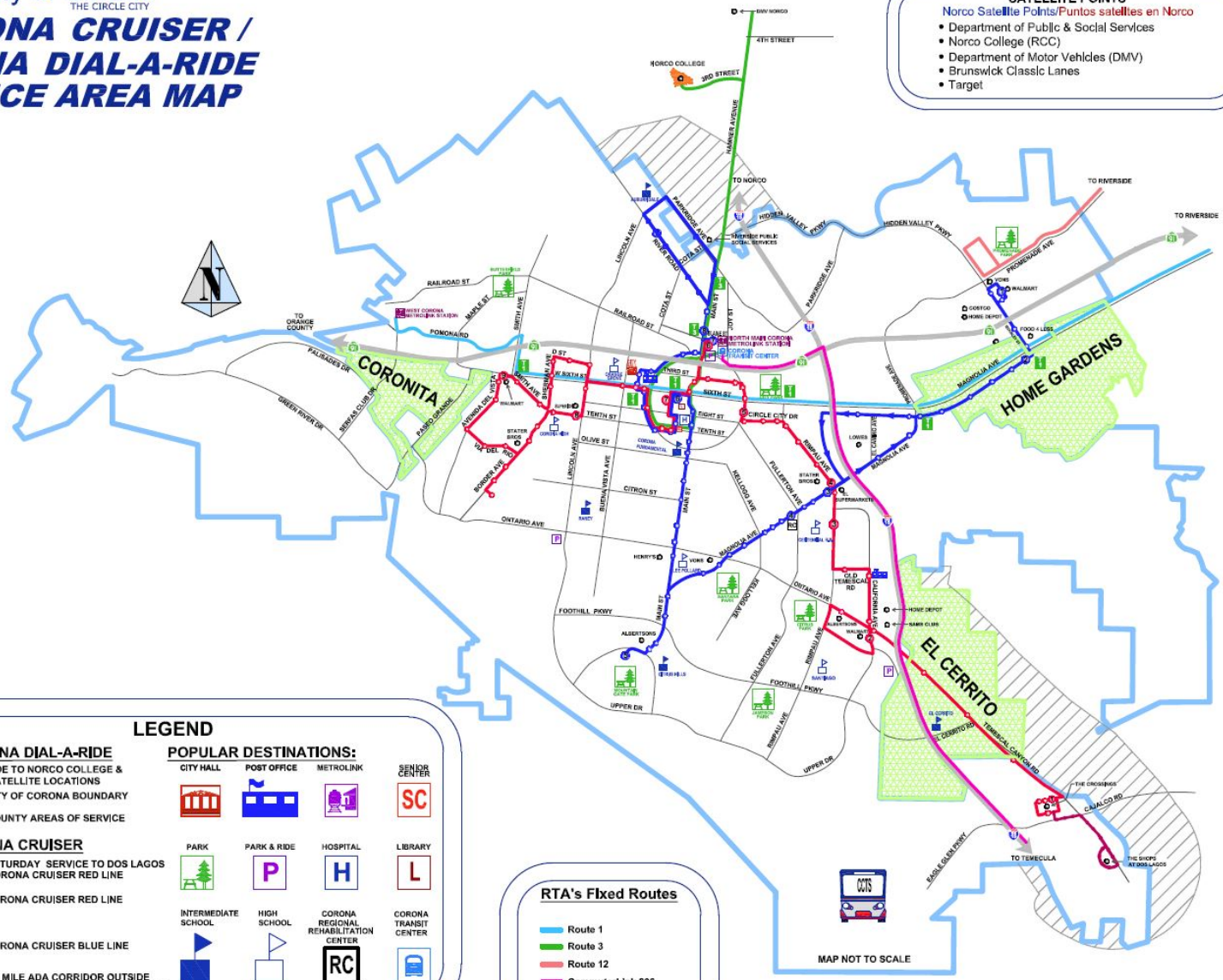
- Riverside Transit Agency – regional public transit agency providing fixed route via the following routes: 1; 3; 12; Commuter Links 205/206; and Dial-A-Ride serving seniors and persons with disabilities.
- Southern California Regional Rail Authority (Metrolink) – provides commuter rail service to Los Angeles and Orange counties via the 91 Line and Inland Empire Orange County Line respectively.
- Orange County Transportation Authority – provides express, peak hour bus service between Orange and Riverside counties.

**Figure 1**



City of Corona  
THE CIRCLE CITY  
**CORONA CRUISER /  
CORONA DIAL-A-RIDE  
SERVICE AREA MAP**

- SATELLITE POINTS**  
Norco Satellite Points/Puntos satelites en Norco
- Department of Public & Social Services
  - Norco College (RCC)
  - Department of Motor Vehicles (DMV)
  - Brunswick Classic Lanes
  - Target



**LEGEND**

**CORONA DIAL-A-RIDE**  
DIAL-A-RIDE TO NORCO COLLEGE & NORCO SATELLITE LOCATIONS  
CITY OF CORONA BOUNDARY  
COUNTY AREAS OF SERVICE

**CORONA CRUISER**  
SATURDAY SERVICE TO DOS LAGOS  
CORONA CRUISER RED LINE  
CORONA CRUISER RED LINE  
CORONA CRUISER BLUE LINE  
3/4 MILE ADA CORRIDOR OUTSIDE CORONA DIAL-A-RIDE SERVICE AREA

**POPULAR DESTINATIONS:**  
CITY HALL  
POST OFFICE  
METROLINK  
SENIOR CENTER  
PARK  
PARK & RIDE  
HOSPITAL  
LIBRARY  
INTERMEDIATE SCHOOL  
HIGH SCHOOL  
CORONA REGIONAL REHABILITATION CENTER  
CORONA TRANSIT CENTER

**RTA's Fixed Routes**

- Route 1
- Route 3
- Route 12
- CommuterLink 206

MAP NOT TO SCALE

March 2023 G.S.



## **B. TITLE VI POLICY**

The City of Corona Transit Service (CCTS) is committed to ensuring that no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any of its programs, activities, or services on the basis of race, color, or national origin. All persons, regardless of their citizenship, are covered under this regulation. In addition, City of Corona Transit Service prohibits discrimination on the basis of race, color, or national origin in its employment and business opportunities.

City of Corona Transit Service will not condone retaliation against an individual for their involvement in asserting their rights pursuant to the Title VI or because they filed a complaint or participated in an investigation under Title VI, and/or this regulation.

As a Federal Transit Administration (FTA) fund recipient, City of Corona Transit Service will ensure that its program, policies, and activities comply with the U.S. Department of Transportation (DOT) Title VI Regulations of the Civil Rights Act of 1964. City of Corona Transit Service will ensure that the level and quality of its transportation service is provided without regard to race, color, or national origin.

City of Corona Transit Service will make good faith and reasonable efforts to achieve environmental justice as part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, activities, and services on minority and low-income populations within the City of Corona Transit Service area.

City of Corona Transit Service operates fewer than 50 buses in peak service, and thus is not required to:

- Provide demographic and service profile maps and charts
- Collect and report survey data regarding customer demographics and travel patterns
- Evaluate service and fare equity changes
- Monitor transit service

## **C. APPLICABILITY**

The policy is applicable to City of Corona Transit Service employees, contract operator employees, and members of the public. City of Corona Transit Service will carry out its programs, activities, and services in compliance with Title VI of the Civil Rights Act of 1964. City of Corona Transit Service employees and contract operator employees will not, on the grounds of race, color, or national origin exclude any person from participating in, deny the benefits of, or subject anyone to discrimination under any City of Corona Transit Service program, activity, or service.

City of Corona Transit Service or any of its employees or contract operator employees will not, on the grounds of race, color, or national origin:

- a) Provide any service, financial aid, or benefit that is different from that provided to others;
- b) Subject an individual to segregation or separate treatment;
- c) Restrict an individual in the enjoyment of any advantage or privilege enjoyed by others;

- d) Deny any individual service, financial aid, or benefits under any City of Corona Transit Service program, service, or activity;
- e) Treat individuals differently in terms of whether they satisfy admission or eligibility requirements; and
- f) Deny an individual the opportunity to participate as a member of a planning or advisory body.

Failure of a City of Corona Transit Service employee or contract operator employee to follow this policy and procedure may subject such employee(s) to disciplinary action up to and including employment termination.

### III. GENERAL REQUIREMENTS

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#### A. TITLE VI NOTICES TO THE PUBLIC

Figure 2 displays the CCTS Title VI Notice to the Public. The CCTS Title VI Notice to the Public (English and Spanish version) is posted at the following locations:

**Location of Notices to the Public**

Location Name	Address	City
Corona City Hall / City Clerk’s Office	400 S. Vicentia Avenue, 1 <sup>st</sup> Floor	Corona
Corona City Hall / Community Services Department	400 S. Vicentia Avenue, 2 <sup>nd</sup> Floor, Suite 225	Corona
Non-advertising passenger shelters	23 locations city-wide	Corona
MV Transportation	735 Public Safety Way, 1 <sup>st</sup> Floor	Corona
On-board buses	N/A	
Corona Transit Website	www.CoronaCA.gov/transit <a href="#">Title VI   City of Corona (coronaca.gov)</a>	

The Title VI Notice to the Public and program information is also provided on the CCTS website at: [www.CoronaCA.gov/transit](http://www.CoronaCA.gov/transit)

The notice contains a commitment 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 protected by Title VI; details about how to get more information about Title VI; and instructions for filing a Title VI complaint. It includes CCTS’ mailing address, telephone number, online contact information, and email address. The notice can be translated to any language on the website using the Translate feature.

**Figure 2 - CCTS Title VI Notice to the Public**



## **Notification of Rights Under Title VI**

The City of Corona Transit Service (CCTS) operates its programs, activities, and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act. Any person who believes he or she has been subjected to any unlawful discriminatory practice protected under Title VI may file a complaint with the CCTS.

For more information on CCTS' Title VI program, and the procedures to file a complaint, contact the City of Corona Community Services Department via telephone at (951) 736-2241, via email at [CoronaTransit@CoronaCA.gov](mailto:CoronaTransit@CoronaCA.gov) or online at [www.CoronaCA.gov/Transit](http://www.CoronaCA.gov/Transit), or visit the Community Services Department at 400 S. Vicentia Avenue, Suite 225, Corona, CA 92822.

A complaint may also be filed directly with the Federal Transit Administration by submitting a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Avenue, Washington DC 20590.

## **Notificación de derechos en virtud del título VI**

El Servicio de Tránsito de la Ciudad de Corona (CCTS) opera sus programas, actividades y servicios, sin distinción de raza, color u origen nacional, en conformidad con el Título VI de la Ley de Derechos Civiles. Cualquier persona que cree que él o ella ha sido objeto de cualquier práctica discriminatoria ilegal protegida en virtud del Título VI, puede presentar una queja ante el CCTS.

Para obtener más información sobre el programa del Título VI del CCTS, y los procedimientos para presentar una queja, póngase en contacto con el Departamento de Servicios Comunitarios de la Ciudad de Corona por teléfono al (951) 736-2241, por correo electrónico a [CoronaTransit@CoronaCA.gov](mailto:CoronaTransit@CoronaCA.gov), en línea en [www.CoronaCA.gov/Transit](http://www.CoronaCA.gov/Transit), o visite el Departamento de Servicios Comunitarios en 400 S. Vicentia Avenue, Suite 225, Corona, CA 92822.

Una queja se puede presentarse directamente con la Federal Transit Administration mediante la presentación de una queja ante la Office of Civil Rights (Oficina de Derechos Civiles), Atención: Título VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Avenue SE, Washington DC 20590.

## **B. TITLE VI COMPLAINT PROCEDURES**

Any person who believes that he/she, or as a member of any specific class of individuals, has been subjected to discrimination on the basis of race, color, national origin, age sex, sexual orientation, or gender identity with respect to CCTS programs, activities, services, or other transit related benefits, may file a written Complaint with CCTS or FTA Office of Civil Rights. A Complaint may be filed by the individual or by a representative. A Complaint must be filed within 180 days of the alleged discrimination date, but complainants are encouraged to submit complaints as soon as possible. CCTS will promptly investigate all complaints filed under Title VI, pursuant to this Regulation.

Appendix A and B contains the CCTS' Title VI Complaint Procedures (English & Spanish) and Appendix C and D contains the Title VI Complaint Form (English & Spanish). This information and the accompanying complaint form are also provided on the CCTS website and is available both in English and Spanish.

## **C. TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS**

CCTS maintains a log of any Title VI complaints, investigations, or lawsuits. There are no active Title VI complaints, investigations, or lawsuits filed against CCTS regarding discrimination on the basis of race, color, or national original in transit-related activities or programs. Furthermore, no Title VI complaints or lawsuits have been filed against CCTS since the last Title VI Program submission. Therefore, no investigations have been conducted. Appendix E includes the sample complaint log used to track any complaints received.

## **D. PUBLIC PARTICIPATION PLAN**

Promoting public participation is an important element of a transit agency's Title VI program. The purpose of CCTS' Public Participation process is to promote public involvement in transit planning and decision-making activities. This plan establishes formal procedures that allow for, encourage and monitor public participation within the CCTS service area. Recipients have wide latitude in determining public participation activities. The Southern California Association of Governments (SCAG) is the metropolitan planning organization (MPO) for the Southern California region, including the County of Riverside. SCAG is responsible for developing long-range transportation and environmental plans for the region. City of Corona Transit Service relies on SCAG's Public Participation Plan to ensure compliance with applicable Title VI regulations in reference to projects that have a regional impact.

However, for projects impacting only City of Corona Transit Service (CCTS) area, the agency has its own public participation process. CCTS recognizes the importance of involving the public in the planning and implementation of transit services. The goals of CCTS' public involvement plan are to ensure that:

- Residents are given the opportunity to participate in the transportation planning process;
- To develop effective means of engaging minority and Limited-English-Proficient (LEP) populations and other constituencies that are traditionally underserved, including people with disabilities and low-income populations; and
- The issues and concerns of residents are given consideration in the selection of transportation investments.

### *1. Public Participation Principles*

When planning for public engagement, CCTS will incorporate strategies intended to promote involvement of minority and LEP individuals in public participation activities, as appropriate for the plan, project, or service in question, and consistent with federal Title VI regulations, Executive Order 13166 on Limited English Proficiency, and the U.S. Department of Transportation LEP Guidance.

At a minimum, CCTS staff will implement strategies such as holding public meetings in locations that are accessible to transit riders and people with disabilities, scheduling meetings at times that are convenient for members of the public, advertising meetings and hearings in the primary languages spoken in the service area as identified in the updated LEP Plan and providing notice of the availability of language assistance.

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

- CCTS will determine what non-English languages and other barriers may exist to public participation within the service area.
- CCTS will provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to all populations in the area.
- Public meetings will be held in locations that are accessible to transit riders and people with disabilities, and will be scheduled at times that are convenient for members of the public.
- Public meetings and hearings will be broadly advertised in the community in non-English languages identified in the LEP Plan through printed materials onboard buses (e.g., interior cards, flyers, and/or comment cards) describing the proposed changes as well as at major transit stops, local print media, and local community centers such as the Corona Senior Center
- CCTS will provide notification regarding the availability of language assistance at public meeting as described in the LEP Plan

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

Public outreach serves many purposes and is multi-layered. The CCTS uses public outreach to apprise riders of temporary stop closures, special events, Title VI protections, and to solicit and inform riders' how, where and when they can participate in the CCTS decision-making process including fare and major service changes. Public outreach methods range from on-board notices and rider alerts to community meetings and public hearings. Outreach efforts include the dissemination of information about CCTS services through promotional/informational material distributed at schools, major trip generators and online as well as through partnerships with local and regional agencies who, in turn, inform their constituents about CCTS transit service.

To ensure inclusive public participation among minority, low-income and senior persons, CCTS will utilize the following strategies:

- Locate meetings at transit accessible and ADA compliant venues



- Partnered with local and regional agencies which primarily serve minority, low-income and senior persons to disseminate fare media and information:
  - Riverside County agencies
    - Riverside County Department of Public Social Services
    - Riverside County Department of Mental Health
    - Riverside County Transportation Commission
    - Riverside County Library/Home Gardens Branch
    - Riverside Transit Agency Transportation NOW Committee
  - Educational Institutions (i.e. school districts, high schools, library)
  - Community organizations (i.e. senior center)
- Utilize newspaper ads that serve LEP populations with circulation in the area associated with CCTS service area
- Consider information dissemination through various communication methods including:
  - Online Transportation website – providing service description, schedule, fare matrix and Title VI information
  - Use of Inner Circle Corona, resource for local news, information, events and community alerts
  - On-board bus surveys
  - Participation in various community events such as Senior Center Health Fair
  - On-board interior bus cards
  - Use of social media
  - On-line through the Community Service Insider monthly alerts
  - Direct email outreach to the City’s affordable housing partners, Senior and Multi-Family Apartment complexes
  - Direct email outreach to all senior living facilities within the city limits
  - Boots on the ground efforts at senior complexes (assuming events/activities available and time permitting)

### *3. Past Public Outreach Efforts*

Like most transit systems, CCTS conducts public outreach primarily during planning studies or when major changes to the transit service are being considered or proposed. While CCTS has not had any major service or fare change for fixed route service, however, in 2022 through 2023, CCTS performed a Comprehensive Operations Analysis (COA), a study of the City’s transit system. The study is performed not only to understand the current use and performance of the system but how the performance and use of the system is changing over time. This effort is undertaken with the objective to increase service efficiency and effectiveness by responding to the changing demands for transit throughout the service area and provide recommendations for service improvements. One of the components of this project is to collect input from the public and stakeholders in order to meet the community mobility and transit needs.

Preliminary outreach efforts for the COA included the following:

In all efforts, English and Spanish speaking staff participated.

- On-board rider survey February 2022
  - Informational flyers and posters displayed on board buses informing passengers of the study (see Exhibit [REDACTED])
  - A ten dollar (\$10) gift card given to each respondent
- Community wide survey March 2022
  - Information flyers and posters displayed on board buses, city website and social media (see Exhibit [REDACTED]).
  - Incentivized survey by offering a day pass to the first 500 respondents with five of the respondents selected for a \$50 gift card.
- Information shared with stakeholders such as RTA, RCTC, and local school district.
- Distributing paper surveys and posters with QR code to the various apartment complexes throughout the City, including all senior living facilities.
- Staff participated with boots on the ground efforts that included surveying at two senior food drives, and door-to-door surveying at a senior apartment complex where service was previously discontinued.
- Direct email outreach to all of the City's affordable housing partners, Senior and Multi-Family.
- Alternative paper surveys were created to encourage participation from community members that either are unfamiliar, uncomfortable or lack access to the internet.

Upon drafting service recommendations, the following outreach efforts were conducted:

- Presentation to City Council November 2022
- Informational flyers and posters with link/QR code to the feedback survey were displayed onboard buses, city website and social media informing community of draft service recommendations (see exhibit [REDACTED])
- Staff attended the Corona Senior Center and City-wide Winter event to provide information about the proposed service recommendations and to encourage the community to participate in the feedback survey. Virtual Town Hall Meeting December 2022

The rider survey conducted part of the COA, in February 2022, consisted of twenty-eight questions which collected information about trip purpose, trip origin and destination, customer demographic information, and customer opinion. A total of 123 surveys were collected and analyzed. The survey was available in both English and Spanish. Twenty-two percent of survey respondents answered using the Spanish-language survey. The following graph represents the summary results of the onboard survey.



# ONBOARD SURVEY Summary Results

## WHO RIDES THE CORONA CRUISER?

### Demographic info



24%  
Have a valid driver's license



hello  
58.4%  
Speak English

Hola  
35.2%  
Speak Spanish

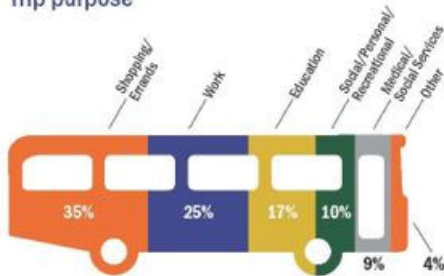


### Length of time using the Corona Cruiser

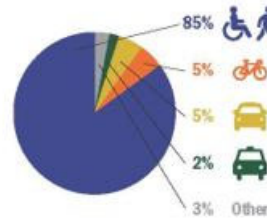


## HOW DO THEY RIDE?

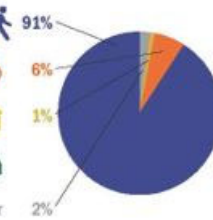
### Trip purpose



### Riders access the Corona Cruiser by



### Trips completed by



### How often they ride



- 29% 3-4 days a week
- 26% 5 days a week
- 23% 1-2 days a week
- 17% 6 days a week
- 3% Less than once a month
- 1% 1-2 days a month

# WHAT DO THEY THINK?

## Overall rating of the Corona Cruiser



## Rider opinions



## Desired improvements



## Riders get info from



The goal of the rider survey was to provide data concerning CCTS bus riders' demographic, travel patterns and levels of satisfaction.

CCTS riders are using transit for various reasons, including shopping, work, education, recreation and medical trips but the primary trip purposes for 35 percent of the passenger boardings was for shopping or errands. Over eighty-five percent of the riders access the Corona Cruiser and complete the trip by walking. In terms of demographics, CCTS riders are of all ages, but a third, 31 percent of the respondents reported the age of 60 and over, followed by youth riders under the age of 18 making up the second largest rider group at eighteen percent. The most common Corona Cruiser riders reported being Hispanic/Latino, accounting for 48 percent of all riders which closely mirrors the demographics of the City of Corona as a whole, where forty-eight percent of the population identifies as Hispanic.

Passengers were asked for number of vehicles available to their household. While 66 percent responded that a vehicle was available, 77 percent of the passengers responded that they did not have a driver license. Therefore, if the bus were not available, the assumption is made that these riders would not be able to make the trip. Majority of the respondents have been using Corona Cruiser for more than 3 years (~45%) and use the service from 3-5 days a week.

The 2022 Public Transportation Community-wide survey was conducted utilizing a myriad of outreach efforts to push the online survey – with multiple social media alerts, including ‘shout-outs’ during Council meetings, through direct boots on the ground, via email, requests to the local unified school district and parent center located in Downtown Corona, and paper survey. Over 500 surveys were received. The purpose of the communitywide survey was to determine potential unmet transit needs in the community. Respondents were asked a number of questions to determine which of the three resident categories they belonged to—current riders, former riders, and non-rider.

#### 4. Summary

The range of public participation strategies and actions included in this plan can engage diverse communities and create ongoing public access, participation and input throughout any study or plan. Each public outreach process will engage varied stakeholders: (residents, businesses, transit users, elected officials, local area organizations and others).

### **E. LIMITED ENGLISH PROFICIENCY (LEP) PLAN**

Individuals who have a limited ability to read, write, speak or understand English are Limited English Proficient or “LEP” as defined in the FTA Title VI regulations. CCTS supports the goals of Title VI of the Civil Rights Act of 1964, Federal Executive Order 13166 and the Department of Transportation's (USDOT) Limited English Proficiency (LEP) Guidelines by making reasonable accommodations for those individuals with limited English proficiency (LEP) and by providing meaningful access to our services and programs to LEP individuals. CCTS developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency.

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

*Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.*

*Factor 2: The frequency with which LEP persons come into contact with the program.*

*Factor 3: The nature and importance of the program, activity, or service provided by the program to people’s lives.*

*Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.*

The Four Factor Analysis is used to determine the specific language services that are appropriate to provide to ensure meaningful access to programs and activities. A summary of the results of City of Corona Transit Service four-factor analysis is in the following sections. The analysis uses data from the

20721 five-year American Community Survey, which has the largest sample size and most reliable data of any current source.

The analysis provided in this report has been developed in order to ensure that CCTS provides language assistance to LEP persons. The following section reports the results of the “Four Factor Analysis” included in FTA Circular 4702.1B, followed by the Language Assistance Plan for CCTS.

Within CCTS’ service area, Table 1 represents LEP persons by language group and the percentage of LEP persons in the City of Corona who meet the Department of Justice (DOJ) Safe Harbor provision of “every 1,000 speakers or five percent of the population which is less.”

**Table 1: Language Proficiency in the CCTS Service Area**

Language Spoken at Home	Total Number of Speakers	Speaks English "Less Than Very Well"	Percent Speaking English "Less Than Very Well" of Total Population (Age 5+)
Total Population, Age 5 years and Over	147,950		
Speak English Only	83,279		
Speak English + Another Language - Total	64,671		
Spanish	47,608	13,728	9.3%
Other Indo-European languages	4,334	1,309	0.9%
Vietnamese	2,172	1,289	0.9%
Arabic	2,774	850	0.6%
Chinese	1,366	809	0.5%
Korean	1,400	694	0.5%
Tagalog (including Filipino)	2,522	396	0.3%
Other Asian and Pacific Island	1,176	248	0.2%
Russian, Polish, or other Slavic	324	101	0.1%
French, Haitian, or Cajun	344	22	0.0%
German or other West Germanic	302	53	0.0%
Other and unspecified languages	349	48	0.0%

Languages spoken by at least 1000 people who speak English "less than very well" are shaded.

Source: 2021 5-year American Community Survey , Table C16001: Language Spoken at Home for the Population 5 Years and Over for the City of Corona Service Area



The Safe Harbor provision states, “if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations.

### *1. The Four Factor Analysis*

#### **Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.**

USDOT guidance for this first factor says, “The greater the number or proportion of LEP persons from a particular language group served or encountered in the eligible service population, the more likely language services are needed.”

The U.S. Census Bureau compiles data in its decennial Census and American Community Survey (ACS). Among the data collected is information on primary language spoken at home and the ability to speak English. Categories include whether individuals indicate they speak English “very well” or “less than very well.” The LEP population consists of those individuals who speak other languages AND speak English “less than very well.”

CCTS staff reviewed the 2021 ACS data and determine little change from the 2018 data used in the 2021-2023 Title VI Program. Based on the 2021 ACS data, approximately 44% of the population speak a language other than English. Analysis showed just over 13% of the population having limited English proficiency; that is they speak English “not very well in City of Corona, of those persons with limited English proficiency, 9.3% of the total population speak Spanish; .9% speak Vietnamese; and .9% other Indo-European languages; and the remaining population speak various other languages, each account for less than 1% or 1,000 of the population. The “Other Indo-European language exceed the 1,000-person threshold (1,309) but it is difficult to isolate which languages within this category are most frequently spoken in the service area.

CCTS’s LEP Plan determined that one component of effective engagement with LEP populations is translating vital documents into preferred languages of those most likely to be served by CCTS. CCTS commits to analyzing recent reliable data during each Title VI Program, update to identify LEP populations and adjust any translation requirements accordingly. The LEP Plan is created for both current and potential customers, therefore data from ACS, onboard rider survey and community-wide survey was used for this analysis.

Results from the rider survey of fixed route passengers further refine the LEP population. A survey conducted in spring 2022 showed that 33 percent of passengers identified themselves as white/Caucasian, 28 percent Hispanic, 22 percent Asian/Pacific Islander 12 percent African American, and 5 percent multiple ethnicities and American Indian. Sixty-three percent of those surveyed responded as English language as the primary language spoken most often, followed by 17% speak in Spanish . Another 3 percent spoke Chinese with the remaining 18 percent speaking other languages. Based on the rider survey, Vietnamese was not a language that was considered as the primary language.

CCTS has no direct evidence of language barriers resulting in the LEP population being underserved. As Table 1 shows, the primary language spoken by the LEP population is Spanish. As such, CCTS has focused its efforts on providing bilingual service (oral) and Spanish translation of written materials as the most cost-effective means of communicating with LEP persons. All essential documents are currently provided in Spanish. CCTS has communicated with customer service/Dispatch representatives in preparation for this report, confirming that Spanish is the most common language other than English. It is CCTS's practice to summon a staff employee should assistance be needed for an individual who speaks another language.

In addition, City of Corona website features a Google Translate tool to translate website content in over 100 languages. As of February 16, 2023, the tool included all languages meeting CCTS's LEP threshold (Spanish and Vietnamese).

**Factor 2: The frequency with which LEP persons come into contact with the program.**

The CCTS serves LEP individuals daily via Corona Cruiser and Dial-A-Ride (DAR) service. The use of bus service is a major point of contact with LEP individuals in both of the services (fixed route & DAR). Pass purchase is another point of contact with LEP individuals; CCTS fare media can be purchased online, in-person and on-board bus.

One of the more frequent points of contact is customer service interactions. Customer service/dispatch personnel report daily contact with LEP individuals. The majority of these daily contacts are with Spanish-speaking individuals. The contractor operating the City's transit services estimates an average of eight to ten calls per day for Dial-A-Ride Services and ten to fifteen calls for fixed route service that are from Spanish-speaking persons. Further, the rider survey indicated a preference for a Spanish version from 22 percent of respondents. CCTS considers a conservative approach would be to follow the rider survey and assume that one-fifth of riders are Spanish language LEP persons and ride frequently. In addition, while Table 1 indicates Vietnamese population speaking English "less than well," the rider survey had one respondents speaking this language while also speaking English. Since the last Title VI update, staff has not had any request for communication in a language other than Spanish.

**Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.**

While public transit is not an essential service, as are police, fire and medical emergency services, public transit is a key means of achieving mobility for many LEP persons. According to the rider survey, 34 percent of those surveyed responded "No" when asked if an automobile was available for the trip they were making, and 62 percent responded that they didn't have a driver license. Prompted further, 13 percent would use a Uber/Lyft, 12 percent would arrange a ride with someone else, 36 percent would have walked to their destination and 12 percent would have not made the trip if a bus was not available.

As with public transit in general, transportation service provided by CCTS is a key means of mobility for our riders. In describing the purpose of their trip, riders indicated various destinations including, work, shopping, and medical facilities; highlighting the importance of transportation service to the livelihood and quality of life for our riders and their families.

**Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.**

The Guide (U.S. DOT) acknowledges that a recipient’s level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. The Guide goes on to say that “reasonable steps” may cease to be reasonable where the costs imposed exceed the benefits.

CCTS is a small, municipal provider of fixed route (Blue and Red Lines) and Dial-a-Ride service and is committed to assuring that reasonable steps are taken to provide meaningful access to its information and service by LEP persons. As inferred from census data and rider survey, and tempered with practical experience, Spanish-speaking LEP persons is the target audience. As such, CCTS provides the following services:

Oral:

- Bilingual/Spanish
  - In-person interview
  - Community meetings
  - Public hearing
- Bilingual/Spanish vendor staff
  - 40% of administrative staff including dispatching
  - 38% of the drivers

Written – Spanish translation:

- Brochures – schedule, policies, fare structure
- Bus stop kiosks
- Rider alerts
- Website
- Community meeting and public hearing notice

While CCTS does not track expenditures related to providing these services, this effort does consume considerable resources. Although the focus has been on Spanish-speaking LEP persons, CCTS continues to look for no- or low-cost opportunities to expand translated materials while maintaining a balance between cost and benefit. While there are no local or regional libraries that provide translations services, CCTS is looking to tap community-based organizations for this service (e.g., ethnic-based chambers of commerce). Looking ahead, CCTS staff will use future updates to the U.S. Census, annual rider survey and practical experience to assess demographic changes in the community.

## 2. Language Assistance Plan

Per the Title VI of the Civil Rights Act of 1964 (Title VI), the U.S. Department of Transportation (DOT) implementing regulations, and Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency (65 FR 50121, Aug. 11, 2000)”, CCTS is federally mandated to develop and implement a Language Assistance Plan by which Limited English Proficiency (LEP) persons can meaningfully access translations of written and oral information. Under the LEP Plan, the Language Assistance Plan will contain the following procedures and measures to effectively communicate with LEP persons.

### a. Procedures to Identify an LEP Person in Need of Language Assistance

DOT’s *Safe Harbor Provision* stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations. The City has identified the number and proportion of LEP individuals within its service area using data from the 2017-2021 American Community Survey five-year estimates.

In the CCTS service area, the Spanish-speaking and Vietnamese-speaking LEP language groups constitute the 5% or 1,000 persons of population threshold for which written translations of vital documents should be provided to meet the safe harbor standard.

CCTS will continue to perform assessments to determine the language demographics of its service area using one or more of the following methods:

- Analyze updated census data to identify the percentage of LEP persons by census tract.
- Utilize ridership surveys from transit planning or marketing studies to identify the percent of CCTS riders that are LEP persons.
- Examine records to see if requests for language assistance have been received in the past and if so, for what language.
- Survey front-line staff such as drivers, call center representatives, and receptionist on their experience concerning any contacts with LEP persons during the previous year

### b. Language Assistance Measures

CCTS will strive to offer the following measures to LEP individuals, that is, persons who speak English “not well” or “not at all”:

- CCTS will print its key information in transit documents in English and the LEP identified language to address the community’s needs.
- If a client asks for language assistance and CCTS determines that the client is an LEP person and that language assistance is necessary to provide meaningful access, reasonable efforts will be made to provide free language assistance.

- CCTS will periodically assess client needs for language assistance based on requests for interpreters and/or translation, as well as the literacy skills of the clients.

#### c. Outreach Techniques

If the percentage of LEP persons in a particular census tract is significant or if the ridership surveys show a significant percentage of CCTS's riders are LEP persons, then CCTS will identify the primary language(s) of those individuals potentially impacted and implement the following steps:

- Key transit documents made available in English and in the potentially impacted LEP identified languages within the CCTS service area.
- Access to bilingual staff made available during most service hours for in-person or phone customer service at the administrative offices.

Additionally, when staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed and posted in the LEP language identified. These notices will be posted in the following locations:

- Transit Administrative offices
- Transit buses
- Transit website

Such notices may also be posted or announced with local stakeholders, community centers and effected route major transfer points.

#### d. Staff Training

The following training shall be provided to CCTS staff and contractor (provider of transportation services) and its staff:

1. Information on CCTS Title VI Policy and LEP responsibilities.
2. Information on the Title VI complaint forms and procedures.
3. Description of language assistance services offer to the public.
4. Documentation of language assistance requests.

#### e. Monitoring and Updating the LEP Policy and Language Assistance Plan

CCTS will update the LEP as required by U.S. DOT. At a minimum, the plan will be reviewed and updated when data from the 2020 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the CCTS service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area

- 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 transit system’s financial resources are sufficient to fund language assistance resources needed
- Determine whether CCTS fully complies with the goals of this LEP Plan
- Determine whether complaints have been received concerning the agency’s failure to meet the needs of LEP individuals

f. Dissemination of the LEP Policy and Language Assistance Plan

A link to CCTS Title VI Plan which includes the LEP Plan will be available on City of Corona’s Transit website, <http://www.CoronaCA.gov/Transit> . Alternatively, any person may request a copy of the plan via telephone, fax, mail, or in person. In addition, if feasible, LEP individuals may request translated copies of the document in an LEP identified language.

Questions or comments regarding the LEP Policy and Language Assistance Plan may be submitted to Community Services Department and/or Sudesh Paul, Transit Program Manager in the Community Services Department as follows:

City of Corona Transit Service  
 Community Services Department  
 400 S. Vicentia Ave. Suite 225  
 Corona, CA 92882  
 Email: [CoronaTransit@CoronaCA.gov](mailto:CoronaTransit@CoronaCA.gov)

City of Corona Transit Service  
 Sudesh Paul, Transit Program Manager  
 400 S. Vicentia Ave. Suite 225  
 Corona, CA 92882  
 Email: [Sudesh.Paul@CoronaCA.gov](mailto:Sudesh.Paul@CoronaCA.gov)

**F. RACIAL BREAKDOWN OF NON-ELECTED ADVISORY COUNCILS**

CCTS does not select membership to any transit related, nonelected planning boards, advisory councils or committees, or similar bodies. However, CCTS has a high priority goal of providing customer driven community service, and particularly values the views and concerns of the large percentage of minority groups that utilize our system on a daily basis.

**G. SUBRECIPIENT MONITORING**

There were no sub-recipients for this reporting period that received federal financial assistance from the FTA through City of Corona Transit Service.

**H. TITLE VI EQUITY ANALYSIS – CONSTRUCTION IMPACT**

Title VI requires a fixed facility (transit centers, operations facility or yard) impact analysis for construction projects to assess any impacts to minority communities. During the reporting period, City of Corona Transit Service had no projects in this category. See Appendix F for statement endorsed by the City of



Corona Community Services Director, assuring that no FTA-funded construction projects were undertaken by City of Corona Transit Service from 2020 through 2022.

### I. BOARD OF DIRECTORS RESOLUTION OR MEETING MINUTES

The Corona City Council is scheduled to adopt the 2023-2026 Title VI Program at its regularly scheduled meeting on May 17, 2023 (see Meeting Minutes – Appendix G).

## IV. PROGRAM SPECIFIC REQUIREMENTS

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This section addresses the Requirements for Fixed Route Transit Providers section of FTA C 4702.1B. CCTS operates fewer than 50 peak vehicles, therefore is only mandated to detail the system-wide service standards and policies.

### A. SERVICE STANDARDS

Federal Title VI guidelines require all fixed-route transit providers to set service standards and policies for each fixed-route mode operated to guard against discriminatory service design or operations decisions. These standards and policies must address how service is distributed across the transit system, and must ensure that the manner of the distribution affords users access to these assets. Per FTA Circular 4702.1B, the following service standards are required:

- Vehicle Load
- Vehicle Headways
- On-Time Performance
- Service Availability

#### 1. Vehicle Load

Vehicle load is the ratio of passengers on the vehicle to the number of seats on the bus. If the passenger load is high, resulting in overcrowded conditions, additional service may be needed to address the issue. The average of all loads during the peak operating period should not exceed vehicles’ achievable capacities, which are 16 passengers for a 23-foot cut-away bus, 20 passengers for a 25-foot cut-away bus, and 46 passengers for 32-foot buses. Table 2 below lists CCTS fleet detailing its characteristics.

**Table 2: Fleet Characteristics**

CCTS Fleet Inventory as of May 2023								
Year Built	Manufacturer	Fuel Type	Seats w WC Seats w/o WC	Standing	Length (feet)	Total Vehicles	Fixed Route	Demand Response
2012	EIDorado AeroTech 240	CNG	16/2 20/0	N/A	26	2	*	2

2017	Glaval E-450	CNG	16/2 18/0	N/A	25	11	*	11
2015	EIDorado EZ Rider II	CNG	23/2 29/0	17	32	7	7	0
<b>Totals</b>						<b>20</b>	<b>7</b>	<b>13</b>
*While the cutaway vehicles are primarily used for Demand Response, they are however sometimes used for the fixed route system on an as needed basis as identified in National Transit Database.								

CCTS will continue to monitor vehicle load factors and conduct additional surveys if comments or complaints are received relative to overcrowding on a given route.

**2. Vehicle Headways**

Vehicle headway is the measurement of time between buses on a line. Service demand, scheduling constraints, fiscal constraints, and capital resources are all considered when setting headways. Service operates on the two CCTS routes approximately every 70 minutes beginning at approximately 6:30 am until approximately 7:00 pm on weekdays. On Saturday, there is service operating approximately every 60 minutes beginning at 9:00 am and ending at approximately 5:00 pm.

**3. On-Time Performance**

CCTS defines on-time performance for fixed route bus trips as those trips that depart from a time point location no earlier than the time listed on printed schedules, or arrive at the time point no later than 5 minutes from the scheduled time. CCTS staff monitors on-time performance tracked by CCTS’ transit provider for which set at 95% on-time. However, this standard needs to be adjusted and reduced due to the following factors: match the standard with the regional transit provider, RTA; and current bus schedule not reflective of the current service area demographics. Based on the COA study, measured at all time points throughout the system, a typical on-time performance is in the mid-60s in terms of percentage of all trips. The current schedule has been in place since 2010 and much has changed in the city in the past 10 years, including new developments within city limits and growing residential communities around the city that generates more cut-through traffic, continuous freeway construction projects, and the overall travel patterns in the city. The increased congestion, in particular during peak hours make it difficult for buses to stay on schedule. Through the study that is being performed, services alternative are to be presented to council for adoption of the recommended services which includes restructuring the service from two to three routes and updating schedules to better meet the needs of the riders and improve efficiencies.

**4. Service Availability**

It is the goal to provide transit service to residential areas, major medical, shopping, government, employment centers, and activity centers that can support route services. Service availability generally corresponds to the provision of transit service on major traffic corridors in the service area and access to high population centers and trip generators in the areas. CCTS primarily provides fixed-route service to

people who reside within one-half to one-quarter mile of the stops along the routes. In addition to CCTS routes, patrons also have the option to access Riverside Transit Agency routes 1, 3, and 12.

CCTS standard is to have stops spaced approximately one-quarter mile apart, although stops may be located more closely or further away depending on land use and safety conditions. Where site conditions allow, CCTS aims to have far-side stops which reduce conflict with right-turning vehicles, eliminate sight-distance deficiencies at intersection approaches and encourage pedestrians to cross behind the bus.

The local route system will be designed based on transit demand potential which uses various key population characteristics that are common determinants for higher transit ridership. These includes areas that have a higher density of households without access to a vehicle, low-income households, youth, seniors, employment, physical disability, and minority populations. City's Comprehensive Operations Analysis (COA) identified areas of improvement which includes restructuring of the routes and adding microtransit service. Service recommendations will be taken to Council June 2023 for the adoption of the service and implementation plan. The recommendation was based on market analysis. The market analysis included the following indicators: residential and job density; census demographics; profile of riders; community trip patterns; and shape of land use patterns and street networks. These indicators were used to determine the city's transit demand potential. In addition, CCTS will continue to coordinate with Riverside Transit Agency (RTA) and Orange County Transportation to reduce unnecessary duplication of routes and increase the distribution of transit services.

## **B. SERVICE POLICIES**

FTA guidance requires fixed route transit providers to develop a policy for the equitable distribution of transit amenities and for vehicle assignment by route. The following service policies are proposed for:

- Transit Amenities
- Vehicle Assignment

### **1. Transit Amenities**

City of Corona provides and maintains benches, shelters, signage, and trash receptacles at bus stops. Installation of transit amenities along bus routes are based on numerous factors including the number of passengers boardings at stops along the routes.

CCTS policy regarding distribution of transit amenities categorizes stops into three tiers:

Tier 1: Sign only

Tier 2: Tier 1 plus bench seating with up to 5 boardings per weekday

Tier 3: Tier 2 plus trash receptacle with 5-9 boardings per weekday

Tier 4: Tier 3 plus shelter or landmark and shelter lighting have over 10 or greater boardings per weekday

At minimum, signage is provided at all bus stops. Transit amenities such as bus benches are provided as a convenience to passengers. Benches and shelters are placed at high traffic bus stops within the City of Corona service area where there are heavier boarding levels, major landmarks, and major transfer points.

At bus stops outside the City of Corona, the local jurisdictions determine the placement of transit amenities. All new amenities such as benches, shelters, are placed to be ADA-compliant.

There have been no amenity enhancements in the last three fiscal years that have not followed the above policy of distributing based on boarding levels, population need. An assessment of the stops was performed through the COA and it was determined that 82% of the stops have signage, benches and trash receptacles of which 23% of the stops have shelter and shelter lighting.

Due to Covid-19 pandemic over the past few years, ridership and typical boardings have been affected. CCTS is continuing to provide service, however, an accurate measure on consistent ridership is difficult to define at this time.

## *2. Vehicle Assignment*

All CCTS buses on the two fixed routes are identical and are accessible to people with disabilities. The 32-foot EZ Rider II compressed natural gas (CNG) buses are low floor buses that eliminates the traditional three-step entrance. They are designed to accommodate peak hour passenger loads – both seated and standing. The EZ Rider II is outfitted with front and mid-body passenger doors, Cummins engine, Allison transmission, and a kneeling front suspension system that facilitates curb-level passenger boarding.

In addition, buses are rotated to allow for vehicle maintenance to occur and to uniformly use the miles of the buses. [See Table 2](#), Fleet Characteristics for complete inventory of CCTS fleet.

## *APPENDICES*

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## APPENDIX A - TITLE VI COMPLAINT PROCEDURES - English

# City of Corona Transit Service

## Title VI Complaint Procedures

Guidance for Filing an Administrative Complaint under Title VI of the Civil Rights Act of 1964

### ***How to File a Title VI Complaint:***

Any person who believes he/she has been discriminated against on the basis of race, color, or national origin with respect to CCTS programs, activities, or services may file a written complaint, or have a representative file a complaint on your behalf, by completing and submitting to CCTS a Title VI Complaint Form. CCTS investigates complaints received no more than 180 days after the alleged incident. CCTS will only process complaints that are complete. CCTS will promptly investigate all complaints filed under Title VI, pursuant to this Regulation.

### ***Complaint must include the following information:***

1. A complaint must be in writing and signed and dated by the complainant or his/her representative before any action can be taken.
2. A complaint shall state, as fully as possible, the facts and circumstances surrounding the alleged discrimination, including the name and address of the complainant, the date, time, and location of the alleged incident.

A ***Complaint Form*** can be used to file a Title VI complaint with CCTS and can be obtained at (see Title VI Complaint Form – Appendix D):

- Telephone - by calling the Community Services Department at (951) 736-2241 a complaint form can be mailed.
- Email – by emailing at [CoronaTransit@CoronaCA.gov](mailto:CoronaTransit@CoronaCA.gov) or a complaint form can be mailed.
- Online – the Complaint Form can be downloaded from the CCTS webpage at [www.CoronaCA.gov/Transit](http://www.CoronaCA.gov/Transit).
- Visiting – Public Works Dept. at 400 S. Vicentia Avenue, Suite 225, Corona, CA 92882.

The following procedures will be followed to investigate Title VI complaints:

- Within 10 business days of receiving the complaint, the Public Works Director/Title VI Administrator will review the complaint to determine CCTS jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by CCTS.
- Assistance in completing the complaint form is available upon request by visiting the Corona Public Works Department or by calling (951) 736-2266. Spanish translation is available upon request.
- The investigation will be conducted and completed within 30 business days of the receipt of a completed complaint form. The complainant will be notified in writing of the cause for any planned extension to the 30-day rule.



- If more information is needed, CCTS may contact the complainant. The complainant has 10 business days from the date of the letter requesting additional information to submit the requested information to the CCTS Title VI Administrator. If the Title VI Administrator is not contacted by the complainant or does not receive the requested information within 10 business days, CCTS can administratively close the complaint.
- A complaint can be administratively closed also if the complainant no longer wishes to pursue their complaint. Following the investigation, the Public Works Director/Title VI Administrator will issue one of two letters to the complainant: 1) a closure letter or 2) a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the complaint is closed. A LOF summarizes the allegations and evidence used to make the determination regarding the alleged incident, and explains whether any disciplinary action, additional training of staff, or other action or remedy will occur.
- If the complainant is unsatisfied with the decision, she/he has 30 business days from the date of the closure letter or LOF to appeal to the Assistant City Manager or her/his designee. The complainant will receive written notification of the decision of the appeal and the rationale for the finding within 45 business days from receipt of the appeal request.
- A complaint may also be filed directly with the Federal Transit Administration (FTA) at:

Federal Transit Administration Office of Civil Rights  
 Attn: Title VI Program Coordinator  
 East Building, 5<sup>th</sup> Floor - TCR  
 1200 New Jersey Avenue, SE  
 Washington, DC 20590

The FTA strives to promptly investigate complaints. At the conclusion of the investigation, the FTA will transmit a letter of finding to the complainant and the CCTS. If the investigation determines the CCTS is not in violation of Title VI, the FTA will explain why the CCTS was found in compliance. If the FTA determines that the CCTS is in violation of Title VI, the FTA will document the violation and instruct the CCTS to take action to come into compliance.

In the complaint investigation process, the FTA analyzes the complainant's allegations for possible Title VI deficiencies by the CCTS. If deficiencies are identified they are presented to the CCTS and assistance is offered to correct the inadequacies within a predetermined timeframe.

- No CCTS staff or contract staff shall intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title VI or because they have made a complaint, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under Title VI. The identity of complainants shall be kept confidential except to the extent necessary to carry out the purposes of this part, including the conduct of any investigation, hearing, or judicial proceeding arising there under. (49 CFR 21.11e)

The Spanish language version of the Complaint Procedures are also available.

APPENDIX B - TITLE VI COMPLAINT PROCEDURES - Spanish

## Procedimientos Para Presentación de Denuncias bajo la ley de Title VI, Servicio de Transporte de la Ciudad de Corona (CCTS)

Guía para la presentación de una denuncia administrativa bajo la ley de Title VI of the Civil Rights Act of 1964

### Cómo presentar una queja de Title VI:

Cualquier persona que cree que él/ella ha sido discriminado(a) basándose en raza, color u origen nacional con respecto a los programas, actividades o servicios del CCTS puede presentar una denuncia por escrito, o tener un representante presentar una denuncia en su nombre, al completar y enviar a CCTS un formulario de denuncia del Title VI. CCTS investiga denuncias recibidas no más tarde de 180 días después del presunto incidente. CCTS sólo procesará las los formularions de denuncias que esten completos. CCTS rápidamente investigará todas las denuncia presentadas bajo la ley de Title VI, conforme con el Reglamento.

### La denuncia debe incluir la siguiente información:

1. Una denuncia debe ser por escrito y firmada y fechada por el demandante o su representante antes de que cualquier acción se puede tomar.
2. Una denuncia indicará, completamente y como sea posible, los hechos y circunstancias acerca de la alegada discriminación, incluyendo el nombre y la dirección de el demandante, la fecha, hora y ubicación del presunto incidente.

Un **Formulario de Denuncia** puede utilizarse para presentar una denuncia bajo la ley del Title VI con CCTS y puede obtenerse en (ver Formulario de Denuncia del Title VI – Apéndice D), o por:

- teléfono - llamando al Departamento de obras públicas en (951) 736-2266 un Formulario de Denuncia se le puede enviar por correo al solicitante.
- Correo electrónico – por correo electrónico el Departamento de obras públicas en [publwks@CoronaCA.gov](mailto:publwks@CoronaCA.gov) un Formulario de Denuncia se le puede enviar por correo al solicitante.
- En línea – el Formulario de Denuncias puede ser descargado de la Página Web de el CCTA en [www.CoronaCA.gov/Transit](http://www.CoronaCA.gov/Transit).
- O Visitando el Departamento de obras públicas en 400 S. Vicentia Avenue, Suite 210, Corona, CA 92882.

Se seguirán los siguientes procedimientos para investigar las denuncias bajo la ley del Title VI:

- Dentro de 10 días hábiles después de recibir una denuncia, el Director de Obras Públicas /Administrador de Title VI revisará la denuncia para determinar jurisdicción del CCTS en la denuncia. El demandante recibirá un acuse informándole a él/ella si la denuncia será investigada por el CCTS.
- Ayuda para completar el Formulario de Denuncias está disponible por petición visitando el Departamento de Obras Públicas de Corona o llamando al (951) 736-2266. Traducción en español está disponible por petición.
- La investigación se llevará a cabo y completada dentro de 30 días hábiles después de la recepción de un Formulario de Denuncia completado. El demandante será notificado por escrito de la causa de cualquier extensión no programada a la regla de los 30 días..
- Si se necesita más información, el CCTS puede comunicarse con el demandante. El demandante tiene 10 días hábiles desde la fecha de la carta solicitando información adicional para presentar la información solicitada por el Administrador del Title VI del CCTS. Si el Administrador del Title VI no es

contactado por el demandante o no recibe la información solicitada dentro de 10 días hábiles, el CCTS puede cerrar administrativamente la demanda.

- Una demanda puede ser cerrada administrativamente también si el demandante no desea proseguir su demanda. A raíz de la investigación, el Director de obras públicas/Administrador de Title VI emitirá una de dos cartas al demandante: 1) una carta de cierre o 2) Carta de hallazgo (LOF). Una carta de cierre resume las acusaciones y afirma que no hubo una violación de la ley del Title VI y que la denuncia esté cerrada. Una Carta de hallazgo resume los alegatos y pruebas para tomar la determinación sobre el incidente y explica si se producirá cualquier acción disciplinaria, entrenamiento adicional del personal, u otra acción o recurso.
- Si el demandante está insatisfecho con la decisión, él/ella tiene 30 días hábiles desde la fecha de la carta de cierre o Carta de hallazgo para atraer a la Asistente del Administrador de la Ciudad o su designado. El demandante recibirá notificación por escrito de la decisión de la apelación y razón fundamental para decisión dentro de 45 días hábiles desde la recepción de la solicitud de apelación.
- Una queja puede ser presentada también directamente con al Federal Transit Administration (FTA) en:

Federal Transit Administration Office of Civil Rights  
Attn: Title VI Program Coordinator  
East Building, 5<sup>th</sup> Floor - TCR  
1200 New Jersey Avenue, SE  
Washington, DC 20590

El FTA se esfuerza por investigar con prontitud las demandas. En la conclusión de la investigación, el FTA transmitirá una carta del hallazgo al demandante y el CCTS. Si la investigación determina que el CCTS no está en violación del Title VI, el CCTS le explicará por qué el CCTS se encontró en cumplimiento. Si el FTA determina que el CCTS está en violación del Title VI, el FTA documentará la violación e instruirá a el CCTS para que tome medidas para el cumplimiento de ley del Title VI.

- En el proceso de investigación de la demanda, el FTA analizará los alegatos del demandante para investigar posibles deficiencias del CCTS bajo la ley del Title VI. Si se identifican deficiencias se presentarán a el CCTS y se le ofrecerá ayuda para corregir las deficiencias en un plazo predeterminado.
- No personal del CCTS o de su contratista deberá intimidar, amenazar, coaccionar o discriminar a cualquier individuo con el propósito de interferir de cualquier derecho o privilegio asegurado por el Title VI o porque han hecho una denuncia, testificado, asistido o participado de cualquier manera en una investigación, procedimiento o audiencia bajo el Title VI. La identidad de los denunciantes se mantendrá confidencial excepto en la medida necesaria para llevar a cabo los propósitos de esta parte, incluyendo la realización de cualquier investigación, audiencia o procedimiento judicial que se presenta en virtud del mismo. (49 CFR 21.11e)



APPENDIX C - TITLE VI COMPLAINT FORM - English



City of Corona Transit Service  
Title VI Complaint Form



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

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

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

Signature and date are required below to complete form:

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

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

City of Corona  
Attn: Public Works Director/Title VI Administrator  
400 S. Vicentia Avenue, Suite 210  
Corona CA 92882

This form can also be submitted via Email at: [publwks@coronaca.gov](mailto:publwks@coronaca.gov). Please include the following in the subject line: CCTS Title VI Complaint – Attn: Public Works Director/Title VI Administrator.



APPENDIX D - TITLE VI COMPLAINT FORM - Spanish



City of Corona Transit Service  
Title VI Complaint Form



<b>Sección 1: Por favor escriba legible</b>		
1. Nombre:		
2. Dirección:		
3. Número de teléfono :	3.a. Número de teléfono secundario (Opcional):	
4. Dirección de correo electrónico:		
5. ¿Necesita formato accesible? De:	<input type="checkbox"/> Letra Grande	<input type="checkbox"/> Cinta De Audio
	<input type="checkbox"/> Dispositivo de telecomunicaciones para sordos	<input type="checkbox"/> Otro
<b>Sección II:</b>		
6. ¿Es la declaración de esta queja por usted misma(o)?	<input type="checkbox"/> *	<input type="checkbox"/> NO
* Si su respuesta es "sí" a la pregunta número 6, vaya a la Sección III.		
7. Si su respuesta es "no" a la pregunta número 6, ¿cuál es el nombre de la persona a quien usted está presentando con esta queja? Nombre:		
8. ¿Cuál es su relación con esta persona:		
9. Por favor, explique por qué usted ha presentado la queja por cuenta ajena:		
10. Por favor, confirme que ha obtenido el permiso de la parte agraviada para presentar en su nombre.	<input type="checkbox"/> SI	<input type="checkbox"/> NO
<b>Sección III:</b>		
11. Creo que la discriminación que experimenté fue basado en (marque todo lo que corresponda):		
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen nacional		
12. Fecha de la supuesta discriminación: ( día / mes / año)		
13. Explique lo más claramente posible lo que pasó y por qué usted cree que fue discriminado. Describa todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona (s) que lo discriminó (si se conoce), así como los nombres y la información de contacto de testigos. Si se necesita más espacio, por favor use la parte de atrás de este formulario.		
<hr/> <hr/> <hr/>		
<b>Sección IV:</b>		

14. ¿Ha presentado previamente una queja del Title VI con el Servicio de Tránsito de la Ciudad de Corona?	SI	NO
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**Sección V:**

15. ¿Ha presentado esta queja con alguna otra agencia, estatal, local, o Federal, o con cualquier corte federal o estatal?  
 SI\*     NO

En caso afirmativo, marque todo lo que corresponda:

Agencia Federal \_\_\_\_\_                       Agencia Estatal \_\_\_\_\_  
 Corte Federal \_\_\_\_\_                               Agencia Local \_\_\_\_\_  
 Corte Estatal \_\_\_\_\_

16. Si usted contestó "sí" a la pregunta número 15, proveer los datos de contacto de una persona de contacto en la agencia / tribunal donde se presentó la denuncia.

Nombre: \_\_\_\_\_

Título: \_\_\_\_\_

Agencia: \_\_\_\_\_

Dirección: \_\_\_\_\_

Número de teléfono: \_\_\_\_\_                      Dirección de correo electrónico: \_\_\_\_\_

**Sección VI:**

Nombre de la Agencia de Tránsito que la queja es en contra : \_\_\_\_\_

Persona de contacto: \_\_\_\_\_

Número de teléfono: \_\_\_\_\_

Usted puede incluir cualquier material escrito o cualquier otra información que usted piensa que es relevante para su queja.

Firma y fecha son necesarias a continuación para completar el formulario:

Firma \_\_\_\_\_ Fecha \_\_\_\_\_

Por favor, envíe este formulario completado en persona o por correo a:

City of Corona  
A la atención de: Public Works Director/Title VI Administrator  
400 S. Vicentia Avenue, Suite 210  
Corona CA 92882

A través de correo electrónico a: [publwks@coronaca.gov](mailto:publwks@coronaca.gov). Por favor, incluya lo siguiente en la línea de asunto: CCTS Title VI Complaint – A la atención de: Public Works Director/Title VI

## APPENDIX E - LOG OF TITLE VI INVESTIGATIONS, LAWSUITS AND COMPLAINTS

## City of Corona Transit Service

### Log of Title VI Investigations, Lawsuits, and Complaints

**Background**

All recipients shall prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

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

This list shall include the date that the transit-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to FTA every three years.

<b><u>List of Investigations, Lawsuits and Complaints</u></b>				
	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
<b>Investigations</b>	NONE	NONE	NONE	NONE
<b>Lawsuits</b>	NONE	NONE	NONE	NONE
<b>Complaints</b>	NONE	NONE	NONE	NONE

APPENDIX F - TITLE VI EQUITY ANALYSIS – NO CONSTRUCTION STATEMENT

**City of Corona Transit Service  
Title VI  
No Construction Undertaken Statement**

August 10, 2020

This statement is affirmation that the City of Corona Transit Service did not undertake construction activities using Federal Transit Administration (FTA) funds from the last reporting period of July 2018 through June 2020 and into the current fiscal year 2021. Nor are there plans to undertake such FTA funded construction projects during the 2021 through 2023 reporting period.

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Tom Koper, P.E.  
Acting Public Works Director

APPENDIX G - DOCUMENTATION OF COUNCIL ACTIONS RELATED TO TITLE VI



**Reserved for City Council approval action**



