

Title VI Submission

July 19, 2010



City Utilities – Transit

**1505 N. Boonville Ave.
Springfield, Missouri 65803**

**Submitted by
Diane Gallion
Paratransit Supervisor**

TABLE OF CONTENTS

- **GENERAL INFORMATION**
- **GENERAL REPORTING REQUIREMENTS**
- **PROGRAM SPECIFIC REQUIREMENTS FOR GRANTEES IN URBANIZED AREAS**
- **APPENDIX A – SERVICE REVIEW PROCESSES AND POLICIES**
- **ATTACHMENT A – CU’S TITLE VI RESPONSIBILITIES**
- **ATTACHMENT B – TITLE VI COMPLAINT FORM**
- **ATTACHMENT C – OTO TITLE VI PLAN 2007 AND MAPS**
- **ATTACHMENT D – OTO’S FY 2011 – 2014 TIP DRAFT REPORT**
- **ATTACHMENT E – OTO’S TRANSPORTATION DEVELOPMENT PLAN 2007**
- **ATTACHMENT F – CU’S EQUAL OPPORTUNITY POLICY**
- **ATTACHMENT G – OTO’S LONG RANGE TRANSPORTATION PLAN 2030**
- **ATTACHMENT H – CU & OTO’S PUBLIC INVOLVEMENT PROCESS**

GENERAL INFORMATION

- A. **Name of Designated Recipient:** City Utilities Transit
- B. **Name of Applicant/Recipient/Sub-recipient:** City Utilities Transit
1505 N. Boonville Ave.
Springfield, Missouri 65803
- C. **Responsible Official:** Carol Cruise
Director of Transit
417-831-8784
- D. **Submitted by:** Diane Gallion
Paratransit Supervisor
417-831-8368
- E. **Date of Submission:** July 19, 2010

II. GENERAL REPORTING REQUIREMENTS

- A. **A list of any active lawsuits or complaints naming the applicant, which allege discrimination on the basis of race, color or national origin with respect to service or other transit benefits...**

City Utilities Transit has not received any complaints or lawsuits alleging discrimination.

- B. **A description of all pending applications for financial assistance currently provided by other Federal agencies to the grantee.**

City Utilities Transit does not have any Federal grant applications pending with any agency other than FTA.

- C. **A summary of all civil rights compliance review activities conducted in the last 3 years.**

In 2009, FTA conducted City Utilities' Triennial Review. This review looked at procedures and policies in a number of departments. This review included a civil rights compliance section. During this Triennial Review, deficiencies were found with the FTA requirements that CU had not adequately advised the public of their rights under Title VI. Corrective action was taken by CU prior to the exit conference to place a placard on each bus as notification to the public of their rights under Title VI. The FTA Regional Office accepted the corrective action and this finding is now closed.

- D/E. **The most recent date of the grantees signed Annual Certifications and Assurances.**

City Utilities' Grants Administrator provides one assurance document to FTA on an annual basis. This assurance included provisions to comply with Title VI requirements. The Certifications were pinned in TEAM on October 29, 2009.

F. For construction projects, a fixed-facility impact analysis to assess the effects on minority communities.

In fiscal year 2010 CU was awarded an ARRA grant to begin preliminary design and construction of initial site utilities and civil improvements for the Transit/ Fleet Maintenance Boonville Campus Expansion project. The Feasibility Study and Site Plan completed by Walter P. Moore and Associates, Inc in July 2009 determined we would have a positive impact on the local community by improving the existing daily operations with the vacation of Locust Street for fueling, cleaning and nightly storage of buses, reducing traffic congestion and safety with a proposed right turn lane on Campbell Avenue, and improve the appearance of the Boonville Avenue frontage by maintaining the current architectural theme between Division Street north to Court Street. No segments of the community will be isolated by the proposed action, and no segments of the community will be displaced as a result of the proposed action.

III. PROGRAM SPECIFIC REQUIREMENTS FOR GRANTEES IN URBANIZED AREAS

A. Submit a copy of the agency's Title VI internal review process for service delivery and capital programs decisions...

City Utilities' Transit has three committees that oversee service adjustments, reductions, expansions and capital projects. CU has a separate process to review internal and external complaints related to discrimination. Appendix A details the internal review process for the Fixed Route Committee, Paratransit Advisory Committee and the CU Board of Public Utilities. City Utilities Transit website address, www.cityutilities.net/transit has a Title VI Plan and Complaint form (**Attachments A & B**) for viewing and downloading.

B. Provide a narrative documenting implementation of the Title VI Internal review process for at least one service delivery or capital program decision that was implemented during the past three years.

1. City Utilities of Springfield and the local metropolitan planning organization, Ozarks Transportation Organization (OTO) in 2007 began the process of developing a Transit Development Plan (TDP). A TDP is a five-to-ten year plan recommended by the FTA that calls for a description of the transit agency's vision for public transportation, along with an assessment of transit needs and a staged implementation program to set priorities for improvements. A TDP Review Committee was established to monitor and provide input to the project and to review deliverables. Included in this process was surveys of bus operators; local group meetings with users and potential users of the transit system; and on-board surveys designed to capture demographic, travel behavior, and rider satisfaction data and purpose of trip. Discussion with elected officials will take place and this process will

include a task to identify and evaluate alternatives for public transportation service in the OTO study area. The TDP was presented to the CU Board of Public Utilities in February 2007 and the CU Advisory Council in March 2007. The CU Board also reviewed the TDP Plan in depth at its board retreat in April 2007. The OTO developed a Strategic Business Plan in FY 2008 for the recommendations listed in the TDP. **(Attachment E)**

The Ozarks Transportation Organization (OTO) is currently gathering public input for the 2035 Long Range Transportation Plan with a section addressing Environmental Justice Analysis. The last 2030 Long Range Transportation Plan was completed in 2006 and approved by the OTO Board of Directors in February 2006. **(Attachment G)**

2. City Utilities' Transit continues to provide four fixed routes with Job Access and Reverse Commute funds to serve the northwest, northeast, east, southwest and southeast areas of Springfield. The Line 8 Norton operates in northwest Springfield serves a developing industrial park, industry along West Kearney Street, as well as a public library facility. In 2009 Line 8 provided 40,903 passenger trips. Line 10 Cedarbrook operates in the northeast and east central Springfield and serves an industrial area, low-income housings, substance abuse rehabilitation housing, a university, and several social service agencies serving the low income and disabled. Line 10 provided 32,128 passenger trips in 2009. Line 15 E. Kearney serving northeast Springfield serves an established industrial park and industry along East Kearney Street, provided 19,747 passenger trips. Line 11 Sunshine in southeast, south central and southwest parts of Springfield serves low-income housing along South Ingram Mill Road; Bass Pro; Wal-Mart Super Center; the Battlefield Mall; several public schools; and makes connections with other established fixed routes allowing bus passengers the opportunity to make transfers to get to work. CU Transit provided 37,757 passenger trips on Line 11 and 130,535 for all four bus routes.

The CU Transit Department met with the Fixed Route and Paratransit Advisory Committees during several phases of the route development. Several public meetings were held prior to implementing the routes to get the public's input. Initial ridership and user data from Transit were evaluated for an 18-month trial period and reported to the CU Board of Public Utilities every 6 months initially. CU Facilities Services provided GIS maps and demographic information on the neighborhoods surrounding ¼ of a mile for each of the routes. Transit Advertising provided public information support for the project to get the word out about the new routes. Transit Administration continues to monitor the routes to determine if additional service changes will improve ridership. CU Grant Administrator has continued to pursue funding for the continuation of these routes through the JARC program. A Coordinated Transportation Plan was developed to enable City Utilities the ability to continue to compete for the Springfield allocation for JARC funding. City Utilities has been awarded the JARC grants since 1999 when the program was first developed.

- C. **Grantees are required to establish internal monitoring processes relative to levels of quality of service. If any disparity has been found during the past three years**

The MPO, Ozarks Transportation Organization (OTO) did not find any disparities on City Utilities transit bus routes, schedules, or transit amenities through their in-depth analysis of services. See OTO's attached Title VI Plan and service analysis (**Attachment C**). The higher levels of service continue to be found throughout the minority communities. City Utilities Transit has purchased a variety of software packages that will assist in the collection and analysis of data. CU Transit has purchased automatic fare collection equipment that will provide better data about customer usage and fare revenue. CU Transit uses a Paratransit scheduling system that allows us to optimize paratransit service more efficiently. We can analyze schedules and run times and make adjustments accordingly.

CU Fleet Management also has procured fleet management software that allows us to better track maintenance expenditures of vehicles throughout the system. As the agency needs to adjust service based upon budget issues, improved data will help us to make decisions that do not have a disproportionately negative impact on minority communities.

- D. Submit a copy of any service standards and policies that have changed over the past three years. Describe the impact of the service standard or policy changes on the minority community.**

City Utilities service standards have not been modified in the past three years. A copy of Ozarks Transportation Organization's Title VI Plan and Analysis of Service Standards is attached for your review. (**Attachment C**)

- E. Submit a list of the projects included in the Transportation Improvement Plan (TIP) of each transit construction and/or major mobility improvement project along with a discussion of the impact on the minority community. If this information has been provided in an environmental assessment or planning study to the regional office, please reference the documents and pages where the discussion can be found.**

CU Transit has the following ranked projects listed in the FY 2011 - 2014 TIP (**Attachment D**). The ranked projects are for operating assistance of fixed route, providing Paratransit service, preventive maintenance, transit security, transit enhancements, transit short range planning, JARC funding, New Freedom funding, construction of a new intermodal bus transfer facility, replace paratransit fleet, replace fixed route fleet, new fareboxes, new bus security cameras, and construction of a new Transit/Fleet Maintenance Campus expansion project. A categorical exclusion from environmental assessments was submitted to FTA on the grant applications on the Section 5307 grant, JARC and New Freedom grants. An environmental analysis done by TranSystems Inc. was sent to FTA Regional Office on the construction of the new intermodal bus transfer facility. See copy on file with FTA Regional Office, FTA Grant MO-04-0120. Also, an environmental analysis was done by Walter P. Moore and Associates on the construction of the Transit/Fleet Maintenance Campus Expansion project and is also on file with the FTA Regional Office for ARRA grant MO-96-X007.

The Springfield and surrounding area MPO, Ozarks Transportation Organization, has provided responses to the program specific requirements for the Metropolitan Planning Organization Civil Rights submission. Also included are the GIS Maps detailing the location of minority populations in relationship to the bus routes. See (**Attachment C**) and related maps.

- F. Provide a description of the type of service changes (e.g., route extensions, deletions, changes in hours or days of operation, fare increases, etc., including any changes as a result of contracting out service) proposed by the transit property over the next three years, and a statement of the anticipated effect of these changes on the minority communities and the minority transit users. Provide justification for changes affecting minority community and transit users.**

CU Transit since the last Title VI Plan in 2007 has implemented three fare increase in FY 2008, 2009 and 2010. In 2008 CU requested a 25 cent bus fare increase; in FY 2009 an additional 10 cent increase and a 15 cent increase in 2010. Currently, there is no service changes planned for 2011 – 2015 in the City Utilities Long-Range Plan. CU Transit in cooperation with the local MPO, Ozarks Transportation Organization, has developed a five year Transit Development Plan for the metropolitan region. The last TDP was approved in August 2007. Part of the plan was an in-depth demographic analysis of the transit systems efforts in meeting Title VI requirements. (**See Attachment E**)

APPENDIX A – SERVICE REVIEW PROCESSES AND POLICIES

Most complaints and requests are generated through City Utilities' Transit, although some calls are generated through other departments of the Utility. Other customer calls are transferred to a supervisor in Transit who takes the customers' calls. Complaints are generally forwarded to CU Transit personnel. Operational issues usually cover schedule adherence, driver conduct and vehicle operation. All other issues are generally routed through the Transit Bus Supervisors first. If there is a question, Bus Supervisors generally discuss who should follow-up on the call, when a follow-up is necessary.

Customer complaints involving discrimination are routed directly to Carol Cruise, Director of Transit, unless the complaint involves an employment issue. City Utilities has published on our website a Title VI Complaint Form and a Title VI Plan on how to address complaints. Outside complaints of discrimination often come from customers or the FTA. When Transit staff receives a complaint, we investigate the allegation as thoroughly as possible. Transit staff pulls logs and records from supervisors and radio dispatchers to see if there is a record of the incident. If the allegation is more generic and involves policy issues, such as where we operate routes or distribution of amenities, etc., then those complaints are forwarded to Transit personnel for additional data analysis. Once the investigation or analysis is complete a response is sent to the FTA and the complainant. If a remedial action is required, the recommendation is sent to the Associate General Manager – Operations who oversees transit operations. The Associate General Manager's recommendation is forwarded to the General Manager and then on to the CU Board of Public Utilities for final action. There is also an appeal process in place for reconsideration if the request is denied on CU's Transit website on the Title VI Plan.

The Human Resources Manager handles all internal and external complaints related to employment or workplace environment. The HR Manager initiates an investigation of the allegation, by interviewing all the involved parties and any witnesses. They review whether there is enough evidence to require a remedial action or whether the case should be closed pending further incidents. The HR Manager then coordinates the responses to the involved parties and coordinates remedial actions with the department head(s). See **Attachment F** of CU Policy #2.29 Reaffirmation of Equal Opportunity Policy 41CFR60-2.20.

Non-customer or operator initiated service changes are often generated within CU Transit and are routed through the Fixed Route Committee and the Paratransit Advisory Committee. The fixed route committee is chaired by Carol Cruise, Director of Transit, and consists of fixed route passengers and a bus operator. The paratransit advisory committee is chaired by Diane Gallion, Paratransit Supervisor, and consists of paratransit passengers, bus operator, and transit staff. The fixed route and paratransit advisory committees can make suggestions to design new service or reduce transit service. If we are changing bus service, the fixed route and paratransit advisory committees work with CU Transit to try to preserve as much functionality for customers as possible. If we are expanding service, these committees will help design the service to best meet the needs of potential customers in the area.

All analysis includes an analysis of impact on the minority community. If a determination is made that the proposal has a disproportionately negative impact on a minority route or minority census tract, then CU Transit will reassess the proposal for fairness and alternatives. If a change is unavoidable and justifiable, CU Transit will put a service change proposal forward that includes the change.

After the committee meetings, Transit staff will incorporate comments and suggestions into the service proposal when possible. Scheduling documents are prepared for the route changes and CU Transit takes that information into public information sessions. Our customers are invited to comment on the service proposal. These comments are reviewed and incorporated into the plan if possible. Once the plan has been finalized, the CU Board of Public Utilities approves the changes and the transit agency moves forward with implementation.

Capital planning projects follow a process similar to the service review process. Internally, staff from Transit, Fleet Management, Facilities Services, General Management, Purchasing, and Accounting generally participates in capital project planning and oversight. Externally, Transit project management and staff work with local city planners, the Springfield area MPO, elected officials, CU's Board of Public Utilities and interested members of the public during all phases of the project.

Once a project has been proposed, Transit staff analyzes the area and route structure. Staff makes a recommendation about whether the project will be an asset or a liability in the area. If it will benefit our customers and the surrounding neighborhood, then CU Transit proceeds with a study of the project. Architects and engineers begin analyzing the project, and creating preliminary site plans. Generally, CU will hold public meetings to introduce the concept to a neighborhood or community right after an architect has been selected. These meetings will focus on the activities at the transit property, needs of the community and joint development opportunities. The preliminary work is reviewed internally for functionality. Externally, the project is reviewed for compliance with local zoning regulations and planning studies. If there is a transit committee in place in an area, the committee reviews the site plans to make sure that they compliment the community's goals and architecture.

Public meetings will be held in the area surrounding the proposed project. Any comments and suggestions are analyzed and the plan is amended, if appropriate. The final plan is generally introduced to those who assisted with the development. CU senior management will be given the final site plan(s), and then the project will be forwarded to the CU Board of Public Utilities for final approval.