



Anaheim Resort Transportation Service of Anaheim Transportation Network

Title VI Plan



Approved: July 25, 2012

5-26-2015

June 6, 2018



INTRODUCTION

Title VI of the Civil Rights Act of 1964 provides that “no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance.” To fulfill this basic civil rights mandate, each federal agency that provides financial assistance for any program is authorized and directed by the United States Department of Justice to apply provisions of Title VI to each program by issuing generally applicable rules, regulations, or requirements.

PURPOSE OF THE TITLE VI REPORT

The purpose of this report is to document the practices and operations of the Anaheim Transportation Network (ATN) for compliance with Title VI. Its intent is to document the steps to be taken to ensure that, for all programs and activities supported by federal financial assistance, that the ATN provides services without excluding or discriminating on the grounds of race, color or nationality, or creating additional barriers to the use of the ATN transit system.

Consistent with its commitment to meet FTA regulatory requirements, ATN updates and submits this report on a triennial basis to Orange County Transportation Authority (OCTA) in compliance with FTA regulations. This report was prepared for submittal to OCTA on June 7, 2018, as the designated recipient of federal funds on behalf of the ATN.

This report was prepared in accordance with FTA Circular 4702.1B issued October 1, 2012, and contains five (5) main sections. Below are summaries of each Section and the Title VI reporting requirements relating to each section.

SECTION 1: GENERAL REPORTING addresses the general reporting requirements that apply to all recipients of federal funds. These requirements include procedures for filing civil rights complaints; a list of Title VI investigations, complaints, and lawsuits; plans for providing meaningful access to persons with limited English proficiency; notification regarding protection under Title VI; distribution of information and outreach to ensure meaningful access to programs and services by involving customers and the general public in the decision-making process.

SECTION 2: DEMOGRAPHICS & SERVICE PROFILE MAPS presents several maps that illustrate those spatial relationships of minority areas in the context of the programs and services that ATN provides.

SECTION 3: SYSTEM WIDE SERVICE STANDARDS & POLICIES describes the service policies and standards under which ATN operates to ensure high-quality and safe levels of service to the public.

SECTION 4: SERVICE CHANGES discusses the service change process and describes major service changes.

SECTION 5: SERVICE MONITORING evaluates the extent to which ATN has met its service standards and the levels of service provided to the various communities served by ATN.



Below are lists of Exhibits and Attachments referenced in this document.

LIST OF EXHIBITS:

- | | |
|------------|---|
| Exhibit 1: | Anaheim Transportation Network Routes and Stops
with Minority and Non-Minority Areas |
| Exhibit 2: | Anaheim Transportation Network Transit-Related Facilities |
| Exhibit 3: | Anaheim Transportation Network Major Activity Centers |
| Exhibit 4: | Anaheim Transportation Network Low-Income Populations |
| Exhibit 5: | ATN Park & Ride Facilities |
| Exhibit 6: | Fixed Route Service Change Process |
| Exhibit 7: | List of Service & Fare Changes since 2010 |
| Exhibit 8: | Ridership Demographic Survey Results |

LIST OF ATTACHMENTS

- | | |
|---------------|---|
| Attachment A: | FTA Certification and Assurance |
| Attachment B: | Public Participation Plan |
| Attachment C: | Sample of Multilingual Collateral Material |
| Attachment D: | Limited English Proficiency Plan |
| Attachment E: | Language Interpreters |
| Attachment F: | Notification of Protection / Title VI Brochure and Complaint Form |
| Attachment G: | Route Characteristics |
| Attachment H: | Service and Fare Change Policy |
| Attachment I: | Title VI Assessment for the Fare Increase effective October 1, 2017 |
| Attachment J: | Title VI Assessment for the ATN System Expansion Route 23 |
| Attachment K | Title VI Assessment for the ATN System Expansion MicroTransit |



SECTION 1 - GENERAL REPORTING

The following section addresses the general reporting requirements that apply to all recipients of federal funds regardless of the size of its urban area population. These general reporting requirements include procedures for filing civil rights complaints; a list of Title VI investigations, complaints, and lawsuits; plans for providing meaningful access to persons with limited English proficiency; notifications regarding protection under Title VI; distribution of information and outreach to ensure meaningful access to programs and services.

PROCEDURES FOR FILING CIVIL RIGHTS COMPLAINTS

It is the policy of the ATN to employ its best efforts to ensure that all programs, services, activities, and benefits are implemented without discrimination. This section provides information on the ATN procedures for filing complaints alleging discrimination on the basis of race, color, or national origin.

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, national origin or other protected-class interests may file a written complaint with ATN, the FTA, or the Secretary of Transportation. Further, ATN prohibits intimidation, coercion, or engagement in other discriminatory conduct against anyone because he or she has filed a complaint to secure the rights protected by Title VI.

A complaint must be filed within 180 days after the date of the alleged discrimination, unless the time for filing is extended by the Secretary of Transportation. ATN encourages complaints to be initially filed with ATN for resolution. However, in those cases where the complainant is dissatisfied with the resolution by the ATN, the same complaint may be submitted to the FTA or the Secretary of Transportation for investigation. Unless otherwise permitted, the final determination of all Title VI complaints affecting programs and services administered by the FTA will be made by the Office of the Secretary, DOT. ATN follows complaint investigation and format procedures which are in keeping with Title VI requirements.

Complainants may submit written complaints to the ATN directly or to the FTA offices identified below:

Lita Aguilar	Federal Transit Administration
Director of Operations	Office of Civil Rights
Anaheim Transportation Network	Title VI Program Coordinator
2626 E. Katella Avenue	East Building, 5 th Floor – TCR
Anaheim, CA 92806	1200 New Jersey Ave., SE
	Washington, DC 20590

Civic Rights Officer
Federal Transit Administration Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105-1839

In cases where the complainant is unable or incapable of providing a written statement, but wishes the ATN or the FTA to investigate alleged discrimination, a verbal complaint of discrimination may be made. The complainant will be interviewed by an appropriate official authorized to receive complaints. If necessary, the official will assist the complainant in converting verbal complaints to writing. Translation



services will be provided to all complainants, as necessary. All complaints must, however, be signed by the complainants or his/her representative.

RACIAL COMPOSITION OF MEMBERSHIP OF NON-ELECTED BOARDS

ATN does not have non-elected advisory boards.

LIST OF LAWSUITS & COMPLAINTS

The ATN does not have, nor never have had, a lawsuit and/or a complaint filed under Title VI.

CIVIL RIGHTS COMPLIANCE REVIEW ACTIVITIES

As required by 49 U.S.C.5307(l), the FTA conducts a triennial compliance review, including Title VI. As designated recipient of federal funds, OCTA shall conduct a triennial compliance review, including Title VI of the ATN. The review of the ATN's programs, services and activities covered in the 2015 plan, represents the initial review of the ATN services. No prior reviews by the OCTA and/or FTA have been conducted.

TITLE VI CERTIFICATIONS & ASSURANCES

Since 1972, the FTA has required applicants for federal funds to certify compliance with the requirements of Title VI as a mandatory part of the funding approval process. At the start of each fiscal year, ATN shall execute and submit FTA Certifications and Assurances within 90 days of the date a notice of availability is published by FTA in the Federal Register. ATN submits these assurances to OCTA, as designated recipient of federal funds, to convey intent and ability to comply with all applicable provisions, including Title VI. A copy of the 2018 FTA Certification and Assurance is provided as Attachment A.

PROMOTING PUBLIC PARTICIPATION

ATN makes a concerted effort to involve customers and the general public in the planning, development and operation of the ATN's Anaheim Resort Transportation (ART) system. ATN's public outreach process is described in more detail in a separate report titled Public Participation Plan (PPP) in Attachment B. The goal of that plan is to offer real opportunities for the engagement of all citizens of the ART system service area in the decision-making process.

The following describes a wide range of venues utilized by the ATN to maximize the distribution and accessibility of information to its riders and other stakeholders. A sampling of collateral materials is also presented as Attachment C.

DISTRIBUTION OF INFORMATION REGARDING SERVICE CHANGES

ATN actively seeks out public participation by holding community meetings and public hearings prior to all service changes. ATN mails public notices in advance to stakeholders and local residents, encouraging them to participate in the planning process. ATN is mindful of the working population and holds community meetings and public hearings at different times of the day to maximize access to meetings. ATN also encourages written comments by providing mailing and email addresses. Public notices are published in newspapers of general circulation as well as local publications, are placed onboard all buses



as brochures, and are made available online. Because 53.6% of ATN's service area is Hispanic, public notices are distributed in Spanish as well as English. Limited English Proficiency Plan (LEP) presented as Attachment D provides guidelines for outreach to populations to minority populations.

Public comments are also sought at monthly ATN Board of Directors meetings. Each meeting includes a specific time for public comments. This time provides an open forum for individuals to present their concerns regarding transit operations and policies directly to ATN Board of Directors and staff.

To this point, no public comments have been received by the ATN in regard to Title VI compliance and/or complaints. In the event that public comments are received, the ATN would consider these comments and take appropriate action to address and resolve these matters.

LIMITED ENGLISH PROFICIENCY

Limited English Proficient (LEP) individuals are defined as those who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. In keeping with Title VI requirements, ATN provides language assistance to ensure that its LEP users have meaningful access to its services, including route information, telephone based customer services, printed materials including public meeting notices, and other customer based collaterals.

ATN pursues this commitment by:

- Conducting user-targeted language needs assessment
- Consistently employing the procedures delineated in the ATN Title VI Report
- Training its customer services employees regarding interactions with LEP procedures
- Providing translation service for LEP persons
- Clearly delineating its Title VI complaint and grievance procedures

To determine the extent of the LEP service obligation, ATN utilizes an individualized assessment that balances the following four (4) factors:

- The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service of the ATN
- The frequency with which LEP individuals come in contact with the program
- The nature and importance if the program, activity or service provided by the recipient to peoples' lives
- The resources available to ATN and cost-effectiveness

The intent of this assessment is to arrive at a balanced determination that ensures meaningful access by LEP persons to critical services.

LIMITED ENGLISH PROFICIENCY PLAN

In keeping with its continued commitment, ATN's Limited English Proficiency (LEP) Plan (Attachment D) is a strategic plan to reflect overall goals of improving and maintaining language access for all transit customers who are limited in their English proficiency. The goal of the plan is to achieve and maintain



balance for meaningful participation and access to programs and services offered by the ATN while avoiding undue burdens on ATN resources.

CUSTOMER SERVICE

ATN Customer Service, which manages customer comments by phone, mail, e-mail, online or in person, currently benefit from four (4) staff members that speak Spanish. The Customer Service team also utilizes translation services provided by the Visit Anaheim who speak other languages, which provides the ATN with ability to communicate in over 100 languages. See Attachment E for a list of available language interpreters.

NOTIFICATION OF PROTECTION UNDER TITLE VI

As required by Title VI, ATN notifies its customers of their rights and protections under Title VI by providing brochures and on-board signage. Additionally, Notification of Protection is also available online, along with instructions and a form for filing a complaint. Copies of the brochure, which is provided in English and Spanish, and the Complaint Form are provided in Attachment F.

It is the policy of the ATN to employ its best efforts to ensure that all programs, service, activities and benefits are implemented without discrimination, and prohibits intimidation, coercion or engagements and other discriminatory conduct against anyone because he or she has filed a complaint to secure rights protected by Title VI. ATN encourages complaints to be filed with the ATN for resolution, however, complainants are provided with FTA's information as well.

SECTION 2 – DEMOGRAPHICS AND SERVICE PROFILE MAPS

DEMOGRAPHIC DATA AND MAPS

This section addresses the program specific requirements of Title VI, and provides maps, overlays and summary statistics of the ATN service area based on demographic data from 2010 U.S. Census.

DEMOGRAPHICS AND SERVICE PROFILE MAPS

For each Title VI triennial plan, the ATN will provide maps, overlays and summary statistics of the ATN service area, using demographic data from the U.S. Census. These materials were prepared by the Orange County Transportation Authority (OCTA) and are useful both for describing the current composition of neighborhoods in terms of minority residents, and for understanding the spatial relationships of these areas in the context of the services that ATN provides. Exhibits 1 through 4 present a series of maps and overlays that describe these relationships, as required by the Department of Justice, 28 CFR Part 42, Subpart F and the Department of Transportation, 49 CFR Part 21, Title VI of the Civil Rights Act of 1964.

For this report, census data for each census tract within ATN's service area is used to determine the total percentage of minorities. ATN's service area consists of those areas within the City of Anaheim that fall within the Anaheim Resort®, Platinum Triangle™ (including Angel Stadium and Honda Center) and downtown CtrCity Anaheim. In ATN's service area, minority residents comprise 69.39% of the total population. Individual census tracts are then analyzed to determine which ones have minority populations greater than the average. Those minority residential areas are mapped and highlighted as Exhibit 1.



Exhibit 4 identifies transit routes that are those with one-third of its total length serving with a minority census tract.

These graphics form the basis of this report and will be referred to in the discussions that follow.

- **Exhibit 1: ATN Routes and Stops with Minority and Non-Minority Areas** displays the distribution of minority and non-minority residential areas within the Anaheim Transit Network service area. Minority distribution is determined by identifying census tracts where the minority population is greater than the ATN service area average of 71.5%. These areas of residential land use are displayed as Minority Residential Areas.
- **Exhibit 2: ATN Transit-Related Facilities** identifies the locations of all key transit-related facilities in relation to the minority and non-minority populations within and nearby the ATN service area. Key transit-related facilities include ATN transit stations, ATN administrative and maintenance facilities, park and rides, OCTA transportation or bus centers, OCTA bus bases, the OCTA administrative offices, Metrolink rail alignment and Metrolink rail stations.
- **Exhibit 3: ATN Major Activity Centers** illustrates the distribution of primary activity centers in relation to minority and non-minority populations within and nearby the ATN service area. Activity centers include concentrations of employment, elementary, middle and high schools, universities, colleges, and hospitals.
- **Exhibit 4: ATN Low-Income Populations** displays the distribution of low-income populations within the ATN service area. The low-income population distribution is determined by where the per capita income is less than \$21,867. The threshold of \$21,867 is based on 80% of the national per capita income of \$27,334. The residential areas of low-income census tracts are displayed as low-income populations. As of June 2018, all ATN routes have greater than 50% of their service area within low-income areas.



EXHIBIT 1 – ATN ROUTES & STOPS WITH MINORITY & NON-MINORITY AREAS

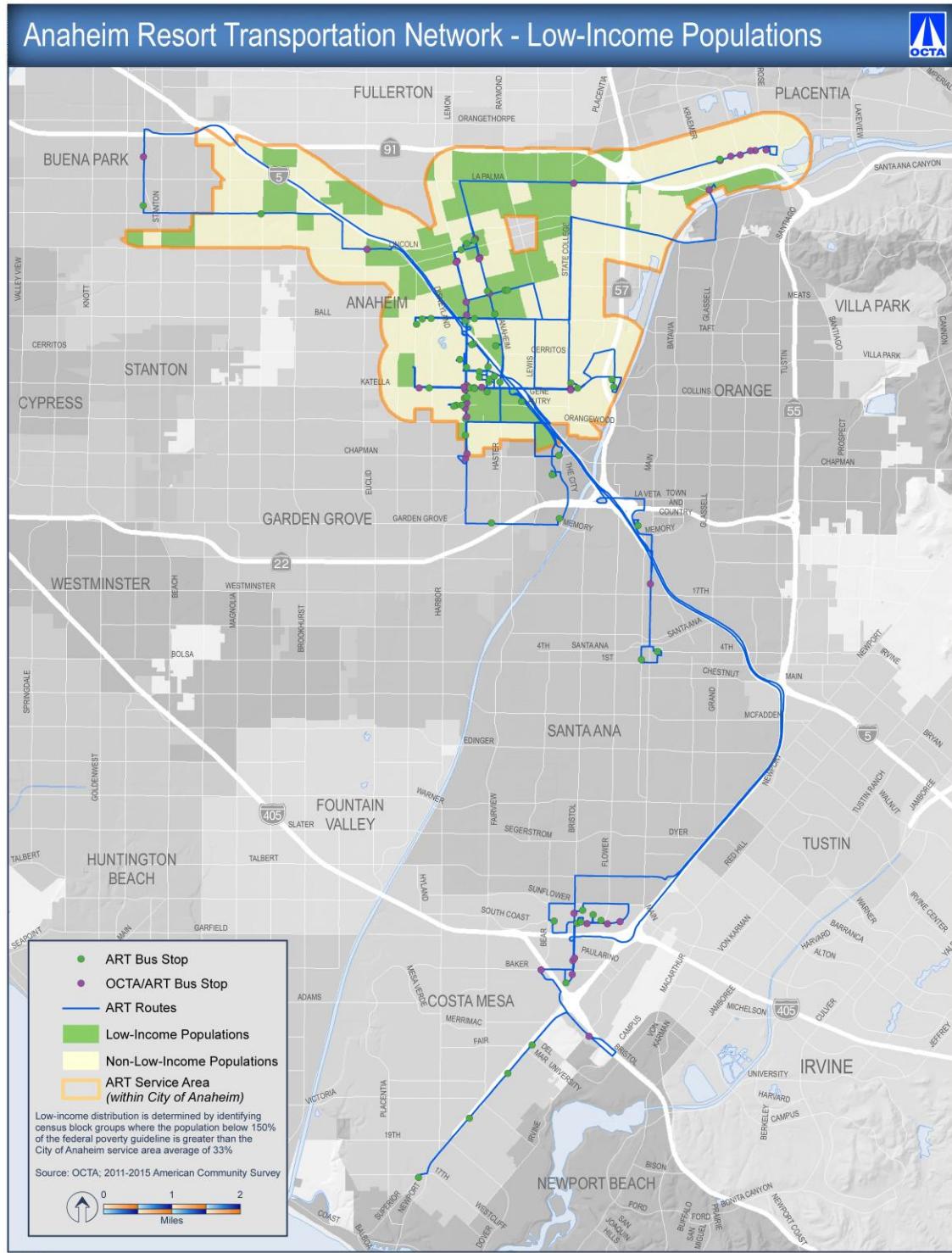




EXHIBIT 2 – ATN TRANSIT RELATED FACILITIES

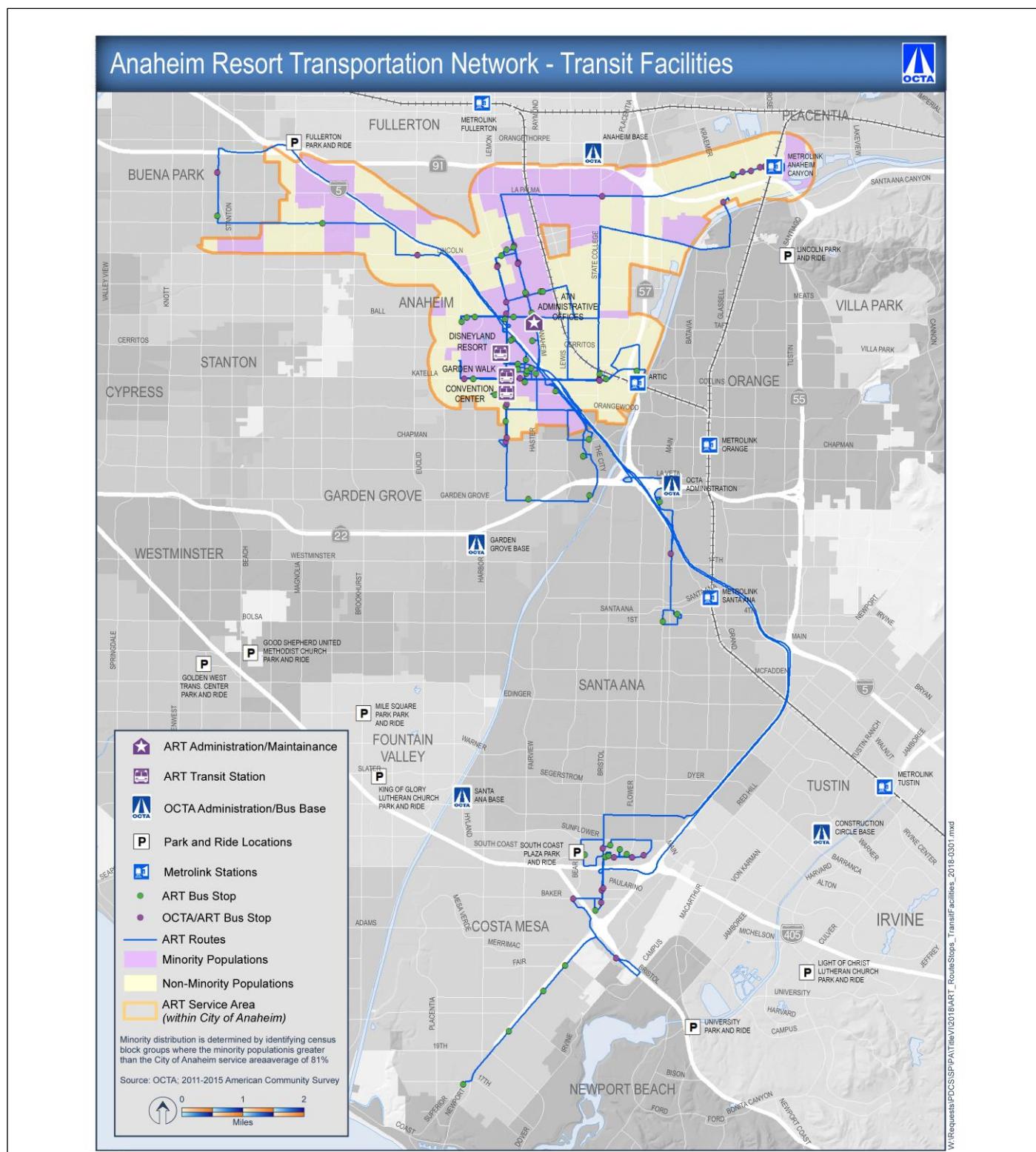




EXHIBIT 3 – ATN MAJOR ACTIVITY CENTERS

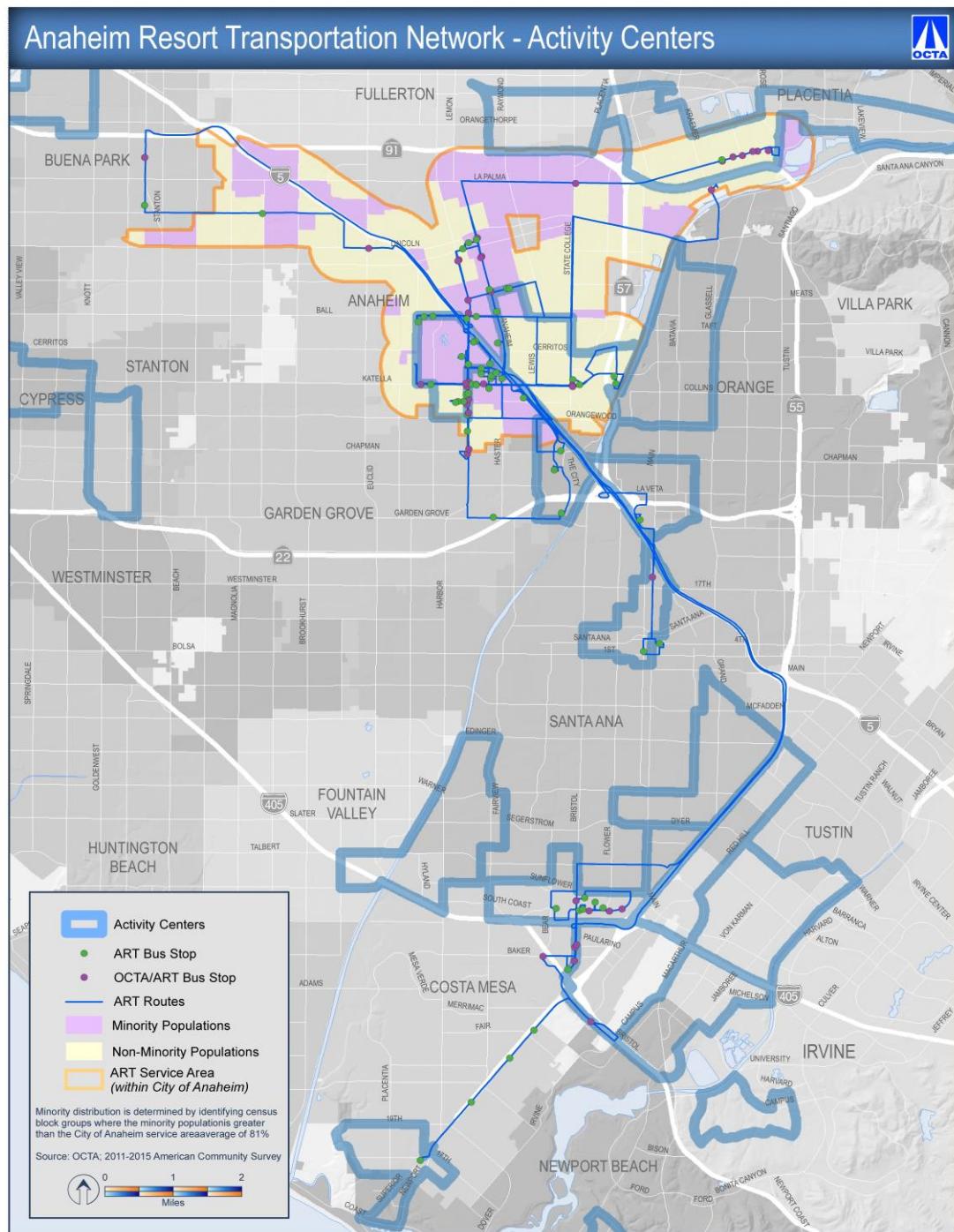
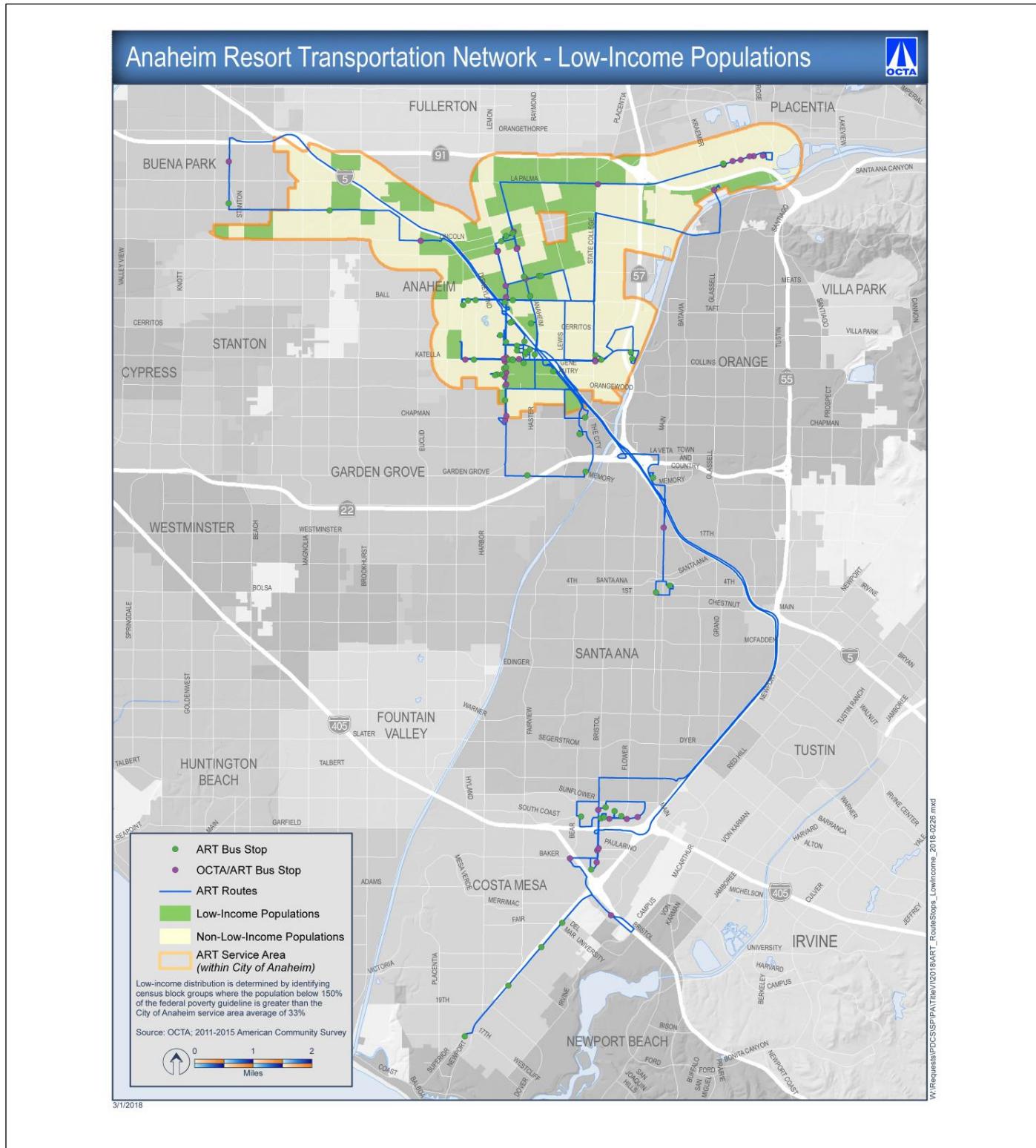


EXHIBIT 4 – ATN Low-Income Populations




SECTION 3 - SYSTEM-WIDE SERVICE STANDARDS & POLICIES

To guard against discriminatory service design or transit operations, Title VI guidelines require the adoption of system-wide service standards and policies. In keeping with these guidelines ATN has established criterion for its transit services to ensure fair use and equitable access to ATN resources and services. The section that follows describes ATN's service standards and policies for vehicle load, vehicle assignment, vehicle headways, distribution of transit service and amenities, and transit access. This section also describes ATN's transit security efforts as required by Title VI guidelines.

ATN reviewed each service standard to ensure full compliance with Title VI guidelines. ATN's adherence to standards is noted in this section.

VEHICLE LOAD

The ATN's vehicle load standard applies to the maximum number of passengers allowed on a service vehicle to ensure the safety and comfort of customers. The load standard is expressed as the ratio of passengers to the number of seats on the vehicle, and it varies by time of day. ATN passenger standing loads should not exceed 15 percent of seating capacity during any two-hour peak period on individual fixed-route. ATN monitors the system to ensure appropriate allocation of resources on its transit routes. Routes experiencing overloading problems are analyzed and provided with additional vehicle capacity and service frequency to ensure adequate comfort for passengers.

ADHERENCE TO STANDARD: Based on the review of operational report, overloading may, or typically, occurs during evening operations. ATN deploys extra vehicle capacity, floaters, to assist with routes along ART system that experience overloading. Increased system demand occurs on all ATN's ART routes. Field supervisors monitors ART service operations and dispatch, in real-time, floater vehicles to assist with overloading issues.

VEHICLE ASSIGNMENT

Vehicle assignments refer to the process by which vehicles are assigned to routes throughout the system. Vehicle assignments to particular routes vary daily based on individual route characteristics and assignments are based on the following:

- Daily anticipated ridership demand on each fixed route
- Percentage loading on the fixed route
- Particular route operating conditions
- Vehicle readiness for service
- Operating schedule

ADHERENCE TO STANDARD: All daily vehicle assignments are made base on the need for service and vehicle availability (based on maintenance needs). Additionally, the entire ATN fixed route bus fleet is within federal standards. All routes are accessible to persons with disabilities. ATN operates its fixed route fleet with environmentally friendly alternative fuels and assigns these buses system wide.



ON-TIME PERFORMANCE

On-time performance is a measure of runs completed as planned scheduled. The majority of ATN's routes operate on headways rather than set schedules. ATN's performance standard is that 95 percent of all runs system-wide must be complete within the allowable headway window, and is stated as such in ATN's contract with its service provider. This is achieved through a dynamic system of dispatching floater buses to accommodate periods of peak ridership throughout the day.

ADHERENCE TO STANDARD: ATN monitors on-time performance and provides reports to the Board of Directors. Monitoring occurs based on report provided through the installed GPS and AVL devices against daily schedule. ATN maintains a 97 percent on-time performance ratio.

SERVICE AVAILABILITY

Service availability is a general measure of the distribution of routes within the service area. ATN operates a very compact service operation, with the majority of the routes operating within The Anaheim Resort®. Longer distance routes, such as 18 and 22 are designed to connect residents with major employment generators in The Anaheim Resort, Platinum Triangle and CtrCity Anaheim. Those routes are specifically aligned to travel into residential neighborhoods that do not have existing transit service.

ADHERENCE TO STANDARD: ATN continues to maintain current service availability:

1. Core ART service operates on a 20-minute frequency
2. Toy Story Line operates on a 5-minute frequency
3. Scheduled ART route operated on a printed schedule

Real-time Text2Go system is available system-wide to make Next Bus arrival information available to all ART passengers.

VEHICLE HEADWAY

The ATN Service Standards for vehicle headway is 20 minutes, except for longer distance routes. The average peak headway of all ATN routes is 20 minutes. Thirteen out of 20 routes operate on 20-minute headways. The remaining seven routes operate on a printed fixed schedule and operate hourly or more frequently. In addition, ATN operates commuter service to the Anaheim Canyon Metrolink station. This service operates on printed schedule to accommodate the arrival and departure of Metrolink trains in the a.m. and p.m.

ADHERENCE TO STANDARD: ATN maintained and will continue to maintain current service frequency to meet community's need for transportation and transit services. ATN will also review and evaluate future on-demand transit applications. Real-time Text2Go system is available system-wide to make Next Bus arrival information available to all ART passengers.



DISTRIBUTION OF TRANSIT SERVICES AND AMENITIES

The ATN's fixed route system is planned and designed to reduce barriers to entry and to maximize access and participation. The system is planned and maintained such that passengers are typically within 100 feet of the transit service area.

ADHERENCE TO STANDARD: All ART bus stops are approved by the City of Anaheim. Real-time Text2Go system is available system-wide to make Next Bus arrival information available to all ART passengers.

BUS STOPS

Fixed route stops are spaced to maximize passenger accessibility, convenience, and safety, while minimizing undue delay or traffic interruptions. Since the ATN operates in a central business district environment, bus stops are spaced to minimize walking to 100 feet.

ADHERENCE TO STANDARD: All ART bus stops are approved by the City of Anaheim. Real-time Text2Go system is available system-wide to make Next Bus arrival information available to all ART passengers.

BUS STOP SIGNS

Bus stop signs are installed at city-approved locations and are maintained by the ATN on a regular basis at no cost to the City of Anaheim or adjacent property. There are approximately 72 stops in the Anaheim Resort Transportation system, and four (4) additional stops for the Anaheim Canyon Metrolink Station Service. ATN provides bus stop information at all ART stops. The ATN's "Text2GO" is available at all stops and provides passengers with an ability to estimate next bus arrival times.

In 2018, ATN is embarking on the first phase of installation of the smart real-time passenger information system through a network of LED and LCD signs at 25 bus stop locations, and passenger information centers at the Anaheim Convention Center Grand Plaza and at the Disneyland Resort Main Transportation Center. These locations will provide visual and oral information about arrival of the next three buses in real time.

ADHERENCE TO STANDARD: All ART bus stops are approved by the City of Anaheim. Real-time Text2Go system is available system-wide to make Next Bus arrival information available to all ART passengers. Future application of real-time signs is planned for 2018 and at Disneyland Resort Main Transportation Center, GardenWalk and at ARTIC.

BUS BENCHES

Bus benches are provided throughout the system to ensure passenger comfort in a number of ways:

- By the local jurisdiction
- By private property owners

Permits for the placement of benches are required by the City of Anaheim, along with the specific signage requirements. ATN works closely with the City of Anaheim and private property owners to ensure that all stops in the ART system are comfortable and secure.



ADHERENCE TO STANDARD: All ART bus stops are approved by the City of Anaheim. Real-time Text2Go system is available system-wide to make Next Bus arrival information available to all ART passengers. Future application of real-time signs is planned for 2018 and at Disneyland Resort Main Transportation Center, GardenWalk and at ARTIC.

OTHER TRANSIT AMENITIES

As part of the cooperation with the City of Anaheim and private property owners, the ATN reviews proposed environmental and development documents to ensure that all properties in the service area provide adequate transit amenities to accommodate passenger comfort and safety. The ATN works with the City staff and private property owners to incorporate features for improving passenger safety, accessibility and convenience as part of each project's approval and Will Serve process.

ADHERENCE TO STANDARD: Even though all ART bus stops are approved by the City of Anaheim, all other transit amenities are approved by the City of Anaheim as part of the development approval and ATN's Will-Serve processes. Currently real-time Text2Go system is available system-wide to make Next Bus arrival information available to all ART passengers. Future application of real-time signs is planned for 2018 and at Disneyland Resort Main Transportation Center, GardenWalk and at ARTIC.

PARK-AND-RIDE FACILITIES

Park-and-Ride facilities provide a valuable resource to allow for transfers to improve local mobility and reduce traffic congestion. The facilities offer a convenient option for individuals to park their vehicle and access ATN's transit system.

ATN works cooperatively with the private property owners to provide park-and-ride facilities throughout the transit system. The existing park-and-ride facilities are owned and maintained by private interests and the ATN is provided with an easement to ensure continued transit availability.

EXHIBIT 5: ATN PARK-AND-RIDE FACILITIES

FACILITY	PARKING SPACES	BUS ROUTES
Disneyland Resort Main Transportation Center – East Esplanade	N/A	All ART Routes
GardenWalk Transportation Center	1,200	1, 2, 3, 4, 5, 9, 12, 15, 16, 20
Toy Story Transportation Center	3,950	1, 2, 3, 4, 5, 9, 15, 16, 18, 20
Anaheim Regional Intermodal Transportation Center -- ARTIC	1,100	15 and 23
Anaheim Canyon Metrolink Station	452	17

ADHERENCE TO STANDARD: All Park&Ride facilities are approved by the City of Anaheim and their amenities are also approved by the City of Anaheim as part of the development approval and ATN's Will-Serve processes. Currently real-time Text2Go system is available system-wide to make Next Bus arrival information available to all ART passengers. Future application of real-time signs is planned for 2018 and at Disneyland Resort Main Transportation Center, GardenWalk and at ARTIC.



TRANSIT ACCESS

ATN operates and supports a number of services and programs for special needs communities. ATN entered into a cooperative agreement with OCTA to provide complementary demand response services to accommodate seniors and persons with disabilities. This service, known as ACCESS, is provided by OCTA throughout Orange County, and includes ATN's service area, within $\frac{3}{4}$ mile of existing fixed routes to comply with the Americans with Disabilities Act (ADA).

The following provides a brief description of the contracted services:

ACCESS SERVICE

The ACCESS service in Orange County, including the City of Anaheim and ATN's service area, is Orange County Transportation Authority's (OCTA) ADA paratransit service element, which began operating in 1993. ACCESS is a curb-to-curb transportation service operating within $\frac{3}{4}$ mile corridor of OCTA and ATN fixed route service within Orange County and Anaheim. This service is available to persons who have been certified as eligible under ADA guidelines. As required by the ADA, ATN through its contractual relationship with OCTA, ensures that no restrictions are made based on trip purpose. ACCESS currently operates seven (7) days per week during hours comparable to fixed route hours of operation.

TRANSIT SECURITY

The ATN works with the Anaheim Police Department and Disneyland® Resort Security teams to provide transit security services and law enforcement. These combined security efforts provide the highest level of security and service for ATN, its customers and passengers.

The ATN works closely with the Tourism Oriented Police (TOP) team and local stakeholders within the community in developing proactive approach to security on the entire ATN bus system.

SECTION 4 – SERVICE CHANGES

This section discusses service changes and the process by which service changes are considered. The process is in keeping with the ATN's commitment in improving transit service for the benefit of the travelling public. This section includes descriptions of major service changes since 2018.

CHANGES IN SERVICE

ATN's funding structure dictates the service model which is derived from a basic premise that each route operated by the ATN has to be self-sufficient. Therefore, when considering service changes a clear and rational decision-making process must be first based on the route's financial sustainability in the short- and long-term. Opportunities for consideration of service changes on the fixed route system are available through two annual service changes that occur in April and October of each year. The major elements of the decision making process that are utilized in the development of the ATN service change program are illustrated in Exhibit 6 of this section.

ANNUAL SERVICE CHANGES



Annual Service Changes implement the phasing of service concepts that are identified based on the demand for services and resource availability. For example, service change ideas geared toward greater service to connect local park-and-ride facilities through the provision of a downtown circulator service was considered and implemented to reduce local dependence on automobiles and thus reduce traffic congestion.

SERVICE CHANGES PROCESS

Major Service changes to the operation of the ATN's fixed route system occur in April and October of each year. Each of these service changes entails approximately five to six months of planning efforts. As illustrated in Exhibit 6, the process begins with a review of the existing system which includes performance evaluation of each route, constituency input, and requests from the business community. ATN staff then identifies opportunities for improvement, including impact on financial performance, and presents information for preliminary consideration to the Board of Directors. All reasonable and funded service changes are considered and evaluated further and scheduled for a public hearing. Recommendations for minor changes are typically evaluated for immediate implementation.

During major changes, service recommendations are prioritized and operational meetings are held to discuss service priorities, resource availability and less quantitative social and system impacts of each proposed service change. Before final recommendation and Board consideration, field testing is conducted to ensure proper routes, bus stop locations, and other safety considerations.

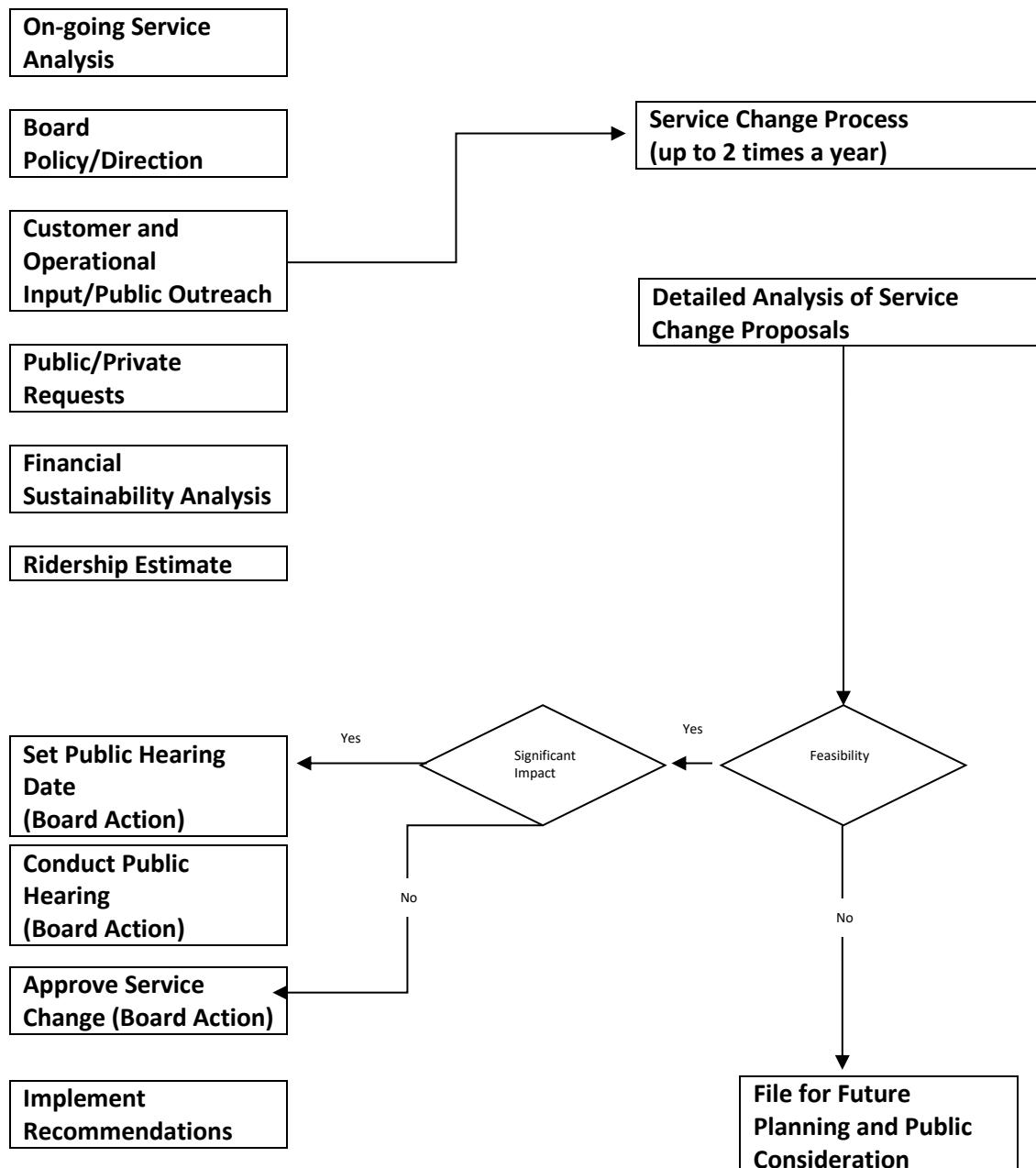
The final recommendations are presented to the ATN Board of Directors. Upon preliminary approval, local private business interests and public entities are notified of the proposed service change and a public hearing is scheduled. Prior to the public hearing, a draft summary of the proposed changes are available for public review on board ATN buses, publicized in a local newspaper and posted on the ATN web site.

Major service changes may require a public hearing in accordance with the ATN policy derived from section 5(i)(3) of the amended Federal Transit Act (formerly Urban Mass Transportation Act of 1964). This policy recommends ATN conduct a public hearing when there is a change in service that directly affects 25 percent or more of a route's length or service mileage, when a new route is introduced, or when a bus route is permanently discontinued.

Numerous factors are taken into consideration with a major service change including operational staff analyses data such as ridership, financial sustainability, capital resources, fleet availability, route configuration, stop locations, operating schedule and personnel resources.



EXHIBIT 6: Fixed Route Service Change Process





SERVICE AND FARE CHANGES

The ATN is committed to providing excellent levels of service and continually striving to improve public transportation options for the benefit of its constituency and customers. The ATN's Anaheim Resort Transportation (ART) system has been growing in service area and ridership since the beginning of service in May 2002. A list of service and fare changes for the past three (3) years is provided below:

EXHIBIT 7: LIST OF SERVICE & FARE CHANGES SINCE MARCH 2009

Service Change	Description
March 2009 Service Change	Service expansion. Addition of Route 17 Downtown Circulator
October 2009 Service Change	No changes in service were implemented
March 2010 Service Change	No changes in service were implemented
October 2010 Service Change	No changes in service were implemented
March 2011 Service Change	No changes in service were implemented
August 2011 Service Change	Introduction of Reduced Fare Pass
October 2011 Service Change	No changes in service were implemented
March 2012 Service Change	Service expansion. Addition of Route 18, 19 and Approval of 15-day and 30-day Pass
October 2012 Service Change	Proposed Fare increase for Adult and Child Passes
March 2013 Service Change	No changes in service were implemented
October 2013 Service Change	No changes in service were implemented
March 2014 Service Change	No changes in service were implemented
October 2014 Service Change	No changes in service were implemented
March 2015 Service Change	Service expansion. Addition of Route 22 with service to City of Costa Mesa
October 2015 Service Change	No changes in service were implemented
April 2016 Service Change	No changes in service were implemented
October 2016 Service Change	No changes in service were implemented
February 2017 Fare Increase & Assessment Adjustment	ART Adult Fare Increase & Assessment Adjustment
April 2017 Service Change	No changes in service were implemented
October 2017 Service Change	Service expansion. Addition of Route 23 Service between CtrCity Anaheim and ARTIC
June 2018	Service expansion. MicroTransit Service at CtrCity Anaheim

Throughout 2016 and 2017, ATN was involved in the ART Capacity Building Plan which developed guidance for the Mobility as a Service/Brokerage service provision concepts as well as Cost Allocation Model. In addition, Will Serve Process was developed for the ATN to establish and institutionalize public transit services integral to the develop approval processes.



SECTION 5 – SERVICE MONITORING

LEVEL OF SERVICE COMPLIANCE ASSESSMENT

The procedures for examining level of service as described in the FTA Title VI Guidelines involve comparing service standards and policies for the system as a whole to individual performance of routes designed as minority transit routes. Minority transit routes are those with one-third or more of its length operating within minority census tracts (Exhibit 4).

The chart presented as Attachment G shows performance results for the ATN fixed routes system including peak and off-peak vehicle headways, peak load factors, vehicle assignments, number of vehicles in service, and the average age of vehicles.

VEHICLE LOAD

Currently, the peak vehicle loads factors for all routes, regardless of minority and non-minority route designation, were found to meet ATN standards which state that peak period load factors should not exceed 50% of seating capacity during a two-hour peak period. Vehicle load factors are consistently evaluated by the ATN and additional vehicle capacity is added to the routes on an as needed basis to ensure comfortable transit experience for all passengers.

VEHICLE ASSIGNMENTS

The total number of vehicles operating during peak evening period is 64 vehicles. During morning peak period, 62 vehicles are operating in service. All vehicles are assigned on routes based on the predicted ridership projection, i.e. projected demand for service

VEHICLE HEADWAY

The majority of routes (13 out of 21) operate on 20-minute headways. The remaining five routes operate on a printed schedule and operate hourly for more frequently. Additional service to the Anaheim Canyon Metrolink Station is also provided on a printed schedule to accommodate commuter train schedules. New service to Ctr City Anaheim connecting downtown Anaheim with ARTIC operated to accommodate commuter train schedules and special events at Anaheim Stadium and the Honda Center,

TRANSIT ACCESS

The ATN has over 72 bus stop location throughout its services area, plus an additional four stops on our Anaheim Canyon Metrolink Station service. Bus stop locations are available at major intersections, numerous private property locations and within easy walking distance of less than one-quarter mile. In addition, ATN contracts with OCTA for complementary paratransit services, which operates the same days and hours as the fixed route service.



MINORITY TRANSIT ROUTES

The ATN fixed route system consists of 21 routes, all of which serve minority residential areas. ATN has 73% or more of route service within minority residential areas. A map of minority routes is show in Exhibit 4.

SERVICE & OPERATOR MONITORING

All ATN buses are equipped with an automatic voice annunciation system to announce all upcoming bus stop locations, major intersections, points of interest and upcoming bus stop location. All operators are required to supplement these announcements to enhance overall passenger experience.

In keeping with ADA requirements, ATN operators announce all transfer points, major intersections, destination points and intervals along the transit routes in a manner sufficient to permit individuals with visual impairments or other disabilities to be oriented to the location, if voice annunciation system is not working.

ATN also employs a staff of “mystery shoppers” whose primary job responsibilities are to observe and report coach operators’ performance, adherence to schedule, and overall performance. These efforts assist the ATN in measuring the quality and reliability of service provision. All reported issues result in retraining and counseling to ensure utmost quality of service.

ATN continuously queries customers in regard to service performance. Through the on-line surveys, on-board comment cards, and customer surveys, the ATN maintains performance data. In July 2012, the ATN conducted the latest survey efforts. This survey was presented in both English and Spanish. The results of this survey are presented in Exhibit 8. New demographic survey will be conducted in 2018. Results of this survey will be reported in the next Title VI Plan.

SERVICE AND FARE EQUITY POLICIES

In accordance with FTA Circular 4702.1B. “Title VI Requirements and Guidelines for Federal Transit Administration Recipients,” effective October 1, 2012, transit providers, operating 50 or more fixed route vehicles during peak hours of service and serving a population of 200,000 or greater, must evaluate prior performance, and all proposed changes that exceed the transit provider’s major service change threshold to determine whether those changes will have a discriminatory impact.

To comply with this requirement, transit providers must adopt the following three policies:

- Major Service Change Policy
- Disparate Impact Policy
- Disproportional Burden Policy

The major Service Change Policy defines what actions constitute a major change and are therefore subject to a service or fare equity analysis. The Disparate Impact Policy establishes a threshold for determining when adverse impacts of a proposed change are borne disproportionately by the minority population. The Disproportional Burden Policy established a threshold for determining when adverse impacts of a proposed change are borne disproportionately by a low-income population.



EXHIBIT 8 – RIDERSHIP DEMOGRAPHICS SURVEY RESULTS (CONDUCTED 2015)

RIDERSHIP COMPOSITION

- Of the 621 transit riders represented in the study:

Adults	65%
Teens	7%
Children (3 - 12 years)	27%

- Composition of individual travel parties

Adults with children	48%
Adults with teens	7%
Adults with teens and children	11%
Adults with no teens or children	34%

ORIGINS

- 36% of total ridership was from California:

Northern California	68%
Central California	12%
Southern California	9%

- 50% - originated in the outside of California:

Arizona	25%
Nevada	13%
Washington	13%

- 22% was international:

Canada	16%
Australia	2%
Mexico	1%
New Zealand	1%

TRANSPORTATION FROM TO THE ANAHEIM RESORT:

- Of the total 2,836 riders represented by the surveys their primary mode of transportation from their homes to The Anaheim Resort was:

Auto	52%
Plane	42%
Bus	4%

PRIMARY REASON FOR VISITING THE DISNEYLAND RESORT DISTRICT:

Overnight vacation/holiday	93%
Convention/meeting	3%
On a day trip	1%
Other	2%

LENGTH OF STAY

- Ave length of stay in the Anaheim Resort / OC was:	
Visitors from California	4.0 days
Other US visitors	4.2 days
International visitors	6.4 days

USAGE OF THE ATN

- 35% of the ridership utilized the ATN before: an average of 6.9 times

TYPE OF ART PASS USED

1 day	39%
3 day	32%
5 day	23%
One way cash fare	3%
15 day	2%
30 day	.5%

AWARENESS OF SERVICE TO BUENA PARK

- 36% of respondents were aware

AWARENESS OF SERVICE TO SANTA ANA

- 22% of respondents were aware

ETHNICITY

- Of those riders who responded:	
African American	4%
American Indian	1%
Asian	4%
Caucasian	78%
Hispanic	7%
Other	6%

ESTIMATED ANNUAL HOUSEHOLD INCOME

- Of those riders who responded:	
Under \$24,999	3%
\$25,000 - \$34,000	9%
\$35,000 - \$49,999	3%
\$50,000 - \$74,999	13%
\$75,000 - \$99,999	16%
\$100,000 - \$124,000	22%
\$125,000 - \$149,999	13%
\$150,000 or more	23%

SERVICE AND FARE EQUITY POLICIES



In accordance with FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," effective October 1, 2012, transit providers, operating 50 or more fixed route vehicles during peak hours of service and serving a population of 200,000 or greater, must evaluate prior performance, and all proposed changes that exceed the transit provider's major service change threshold to determine whether those changes will have a discriminatory impact.

To comply with this requirement, transit providers must adopt the following three policies:

- Major Service Change Policy
- Disparate Impact Policy
- Disproportional Burden Policy

The major Service Change Policy defines what actions constitute a major change and are therefore subject to a service or fare equity analysis. The Disparate Impact Policy establishes a threshold for determining when adverse impacts of a proposed change are borne disproportionately by the minority population. The Disproportional Burden Policy established a threshold for determining when adverse impacts of a proposed change are borne disproportionately by a low-income population.

SERVICE AND FARE CHANGE POLICY

Proposed changes that qualify as a change include changes to existing routes that result in an increase or decrease in route revenue miles or route miles that are equal to or greater than twenty-five percent (25%) of the existing service, as happening one-time or cumulatively throughout the year (Service and Fare Change Policy – Attachment H). A major service change also includes introduction of a new route, the elimination of an existing route and fare media changes.

Changes that are exempt from qualifying as a major change include the introduction or elimination of a limited-term route that will be, or has been, operating for more than twelve (12) months, promotional or temporary fare reductions lasting no longer than six (6) months, and other occasional promotional fares, i.e. "kids ride free."

All major service changes will be subject to a service or fare equity analysis which will include an analysis of adverse effects. An adverse effect is defined as a geographical or time-based reduction in service and a change in fare that increases the fare price or eliminates a fare media.

DISPARATE IMPACT POLICY

A separate impact occurs when the percent minority population adversely affected by a major service changes is twenty percent more than the average minority population of the ART service area. A separate impact may also occur when the percent non-minority population positively affected by a major service change is twenty percent more than the average non-minority population of the ART service area.

A disparate impact analysis on routes with the span of service and/or frequency changes will be examined on a cumulative basis by evaluating all route changes together. A disparate impact analysis on routes with segment and/or alignment changes will be examined on an individual basis by evaluating the route changes separately.



If a disparate impact exists as a result of the proposed changes, ART will determine whether there are alternatives that would serve the same legitimate objectives but with less disparate impact on the minority population. If there are no viable alternatives, ART must have a substantial legitimate justification for making the proposed change.

DISPROPORTIONATE BURDEN POLICY

A disproportionate burden occurs when the percent low-income population adversely affected by a major service changes is twenty percent more than the average low-income population of the ART service area. A disproportional burden may also occur when the percent non-low-income population positively affected by a major service change is twenty percent more than the average non-low-income population of ART service area.

A disproportionate burden analysis on routes with span of service and/or frequency of service changes will be examined on a cumulative basis by evaluating all route changes together. A disparate impact analysis on routes with segment and/or alignment changes will be examined on an individual basis by evaluating the route changes separately.

If a disproportionate burden exists as a result of the proposed changes, ART may take steps to avoid, minimize or mitigate the impact of the proposed changes on the low-income population.

PUBLIC REVIEW AND INPUT

A major service change will be subject to a Public Hearing and Adoption by the ATN Board of Directors. Public input will be actively sought in regard to the proposed changes prior to the public hearing. Customers, stakeholders, and the general public will be invited to provide comments as outlined in the ATN's Public Participation Plan.

When required, the public comment period will begin with the publishing of a legal notice seven (7) days in advance of the public hearing date in the local newspaper of general circulation. The notice will set a specific place, date, and time for one or more public hearings and in accordance with the ATN's Public Participation Plan.

CONCLUSION

ATN is committed to the enforcement of US DOT's Title VI regulations and will provide the most effective and efficient transit services possible, with full accountability to the constituency it serves. Through these established service standards and policies, ATN will ensure that no person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of transit service on the basis of race, color, or national origin.



ATTACHMENT A - FTA CERTIFICATION AND ASSURANCE



FTA CERTIFICATIONS & ASSURANCES

FEDERAL FISCAL YEAR 2018 FTA CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE

(Required of all applicants for FTA assistance and all FTA Grantees with an active capital or formula projects)

AFFIRMATION OF APPLICANT

Name of Applicant: Anaheim Transportation Network

Name and Relationship of Authorized Representative: Diana Kotler, Executive Director

BY SIGNING BELOW: on behalf of the Applicant, I declare that the Applicant has duly authorized me to make these certifications and assurances and bind the Applicant's compliance. Thus, the Applicant agrees to comply with all Federal statutes and regulations and follow applicable federal directives, and comply with the certification and assurance as indicated on the foregoing page applicable to each application it makes to the Federal Transit Administration (FTA) in Federal Fiscal year 2018.

FTA intends that the certifications and assurances the Applicant selects on the other side of this document, as representative of the certifications and assurance in this document, should apply, as provided, to each project for which the Applicant seeks now, or may later, seek FTA assistance during Federal Fiscal Year 2018.

The Applicant affirms the truthfulness and accuracy of the certifications and assurances it has made in the statements submitted herein with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. 3801 et seq., and implementing U.S. DOT regulations. "Program Fraud Civil Remedies," 49 CFR part 31 applies to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. 1001 apply to any certification, assurance, or submission made in connection with the Federal public transportation program authorized in 49 U.S.C. chapter 53 or any other statute.

In signing this document, I declare under penalties of perjury that the foregoing certifications and assurances, and any other statements made by me on behalf of the Applicant are true and correct.

Signature of the Applicant:

Name: Diana Kotler

Name of Applicant Anaheim Transportation Network

As the undersigned Attorney for the above named Applicant, I hereby affirm to the Applicant that it has authority under State, local or tribal law, as applicable, to make and comply with the certifications and



assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the certifications and assurances have been legally made and constitute legal and binding obligations on the Applicant.

OBLIGATIONS OF THE APPLICANT

I further affirm to the Applicant that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these certifications and assurances, or of the performance of the project.

Signature: _____

Date: _____

Name: Fred Whitaker, Cummins & White, LLC
Attorney of Applicant

Each Applicant for FTA financial assistance and each FTA Grantee with an active capital or formula project must provide Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its signature in lieu of the Attorneys; signature provided the Applicant has on filed this Affirmation, signed by the attorney and dated this Federal Fiscal Year.



ATTACHMENT B – PUBLIC PARTICIPATION PLAN



ATTACHMENT C – SAMPLE OF COLLATERAL MATERIALS

List of items:

Signs in ART Buses

ART System Map

Sample of Public Hearing Notices _ News Paper and Mailier

Title VI brochure



ATTACHMENT D – LIMITED ENGLISH PROFICIENCY PLAN



ATTACHMENT E – LANGUAGE INTERPRETERS

American Language Services
1849 Sawtelle Blvd., Suite 600
Los Angeles, CA 90025
alan@alsglobal.net
www.alsglobal.net/interpreting_meetings.php
310/829.0741
310/829.3222 fax

Dayle McIntosh Center for the Disabled
13272 Garden Grove Blvd.
Garden Grove, CA 92843
dmc@daylemc.org
www.daylemc.org/
714/621.3300
714/663.2094 fax

Continental Interpreting Services
3111 N. Tustin St., #235
Orange, CA 92865
stephaniee@cis-inc.com
www.cis-inc.com
714/283.9050

Black Diamond Services
PO BOX 23458
Dana Point, CA 92629
pcs@blackdiamondonline.us
www.blackdiamond.org
949/257.3290
954/786.1596 fax



ATTACHMENT F – NOTIFICATION OF PROTECTION UNDER TITLE VI



ATTACHMENT G – ROUTE CHARACTERISTICS

ATN Route Characteristics										
Route #	% of Route in Minority Tract	Length of Route in Minority Tract (miles)	Length of Entire Route (miles)	PM Peak Headway (mins)	PM Peak Load Factor	Vehicle Type (Series #)	# of Vehicles in Service AM Peak	# of Vehicles in Service Off Peak	# of Vehicles in Service PM Peak	Average Age of Vehicle (years)
1	72%	2.7	3.8	20 mins	1.00 - 1.50	40-ft LNG	1.59	1	1.59	14.66
2	90%	2.7	3.0	20 mins	1.00 - 1.50	32-ft Cut Away	2.00	1	2.59	7.38
3	100%	2.7	2.7	15 mins	1.00 - 1.50	40-ft ZEB	2.00	1	2.59	1.66
4	100%	2.4	2.4	15 mins	1.00 - 1.50	40-ft ZEB	2.00	1	2.59	1.66
5	100%	2.3	2.3	15 mins	1.00 - 1.50	40-ft LNG	2.00	1	2.59	14.66
6	100%	1.8	1.8	20 mins	1.00 - 1.50	40-ft LNG	1.59	1	1.59	14.66
7	100%	2.3	2.3	20 mins	1.00 - 1.50	32-ft Cut Away	1.59	1	1.59	7.38
8	100%	2.7	2.7	20 mins	1.00 - 1.50	32-ft Cut Away	1.59	1	1.59	7.38
9	100%	3.1	3.1	20 mins	1.00 - 1.50	32-ft Cut Away	1.59	1	1.59	7.38
10	100%	2.3	2.3	30 mins	1.00 - 1.50	32-ft El Dorado	1.59	1	1.59	7.38
11	100%	3.4	3.4	20 mins	1.00	Kodiak	2.00	1	1.59	7.38
12	100%	4.1	4.1	30 mins	1.00 - 1.50	40-ft LNG	1.59	1	1.59	7.38
15	100%	5.7	5.7	40 mins	1.00	Kodiak	1	1	1	7.38
16	100%	3.7	3.7	60 mins	1.00 - 1.25	Kodiak	1	1	1	7.38
17	95%	9.97	10.5	Commuter Service	1.00	Kodiak	2	2	2	7.38
18	100%	13.9	13.9	60 mins	1.00	Kodiak	1	1	1	7.38
20	100%	0.9	0.9	5 mins	1.00 - 1.50	LNG	24	18	28	14.66
22	22.2%	5.2	23.4	60 min	1.00	32-ft El Dorado	1	1	1	7.38
23	100%	4.2	4.2	Commuter Service	1.00	32-ft El Dorado	2	1	2	7.38

All 17 routes are considered minority routes with 73% of service within minority areas.

7 floater vehicles are used during am & pm peak between routes 1 - 12



ATTACHMENT H

EXAMPLES OF PUBLIC SOLICITATION PRIOR TO IMPLEMENTATION



**ATTACHMENT I – TITLE VI ASSESSMENT FOR THE FARE INCREASE
EFFECTIVE FEBRUARY 1, 2017**



**ATTACHMENT J – TITLE VI ASSESSMENT FOR THE ATN SYSTEM
EXPANSION ROUTE 23**



ATTACHMENT K – TITLE VI ASSESSMENT FOR THE ATN SYSTEM EXPANSION – MICRO TRANSIT