

Title VI Program (2025 – 2028)

**San Joaquin Regional Rail Commission
(SJRRC)**

May 2025

**949 E. Channel Street
Stockton, California 95202
(800) 411-RAIL
Civilrights@sjrrc.com**



**SAN JOAQUIN
REGIONAL
RAIL COMMISSION**

.

Contents

Introduction 4

Title VI Notice to Public..... 8

Title VI Complaint Procedures & Form..... 9

List of Transit-related Title VI Investigation,
Complaints, and Lawsuits..... 10

Language Assistance Plan 10

Public Participation Plan 11

Makeup of Non-Elected Committee and Councils 12

Sub-recipient Monitoring..... 12

Facility Siting Analysis 12

Service Standards and Policies..... 13

Board Approval 15

Appendix A: Title VI Complaint Forms

Appendix B: Language Assistance Plan

Appendix C: Public Participation Plan

Appendix D: Board Minutes



Introduction

The San Joaquin Regional Rail Commission (SJRRC), which operates the ACE Rail service, is committed to ensuring that its programs and activities comply with Title VI of the Civil Rights Act of 1964. Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. This Title VI Program report outlines the measures SJRRC has implemented to ensure compliance with Title VI requirements and provides a framework for ongoing monitoring and reporting.

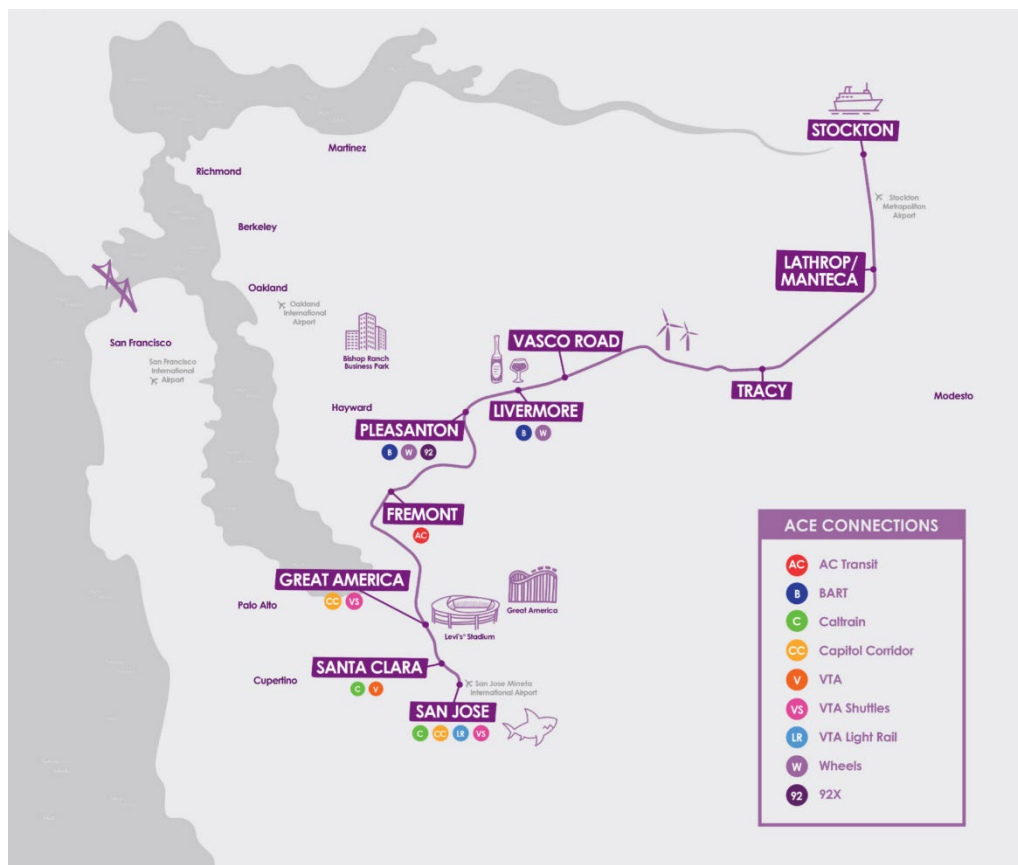
Agency Overview

SJRRC is dedicated to providing efficient and reliable rail service to the communities it serves. The ACE Rail service operates with a fleet of less than 50 vehicles, which places it under specific Title VI reporting requirements as outlined by the Federal Transit Administration (FTA). Specifically, SJRRC is not required to conduct detailed service and fare equity analyses or collect extensive demographic ridership and travel pattern data. However, SJRRC must still adhere to the balance of the Title VI requirements for transit agencies and ensure that its services are provided in a non-discriminatory manner.

Service Overview

ACE Rail is a commuter rail service operating a single main route with multiple stations, connecting residents in the San Joaquin Valley and Tri-Valley areas to employment centers in the Silicon Valley. The service operates during peak commute hours on weekdays. Trips are provided into Silicon Valley in the morning and back in the afternoon.

Figure 1: ACE Rail Map



Title VI Policy Statement

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

Toward this end, it is SJRRC's objective to:

- Ensure that the level and quality of transportation service is provided without regard to race, color or national origin;
- Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;
- Promote the full and fair participation of all affected populations in transportation decision-making;
- Prevent the denial, reduction or delay in benefits related to programs and activities that benefit minority populations or low-income populations; and
- Ensure meaningful access to programs and activities by persons with limited English proficiency (LEP).

The Executive Director, Directors, management, and all employees share the responsibility for carrying out SJRRC's commitment to Title VI. The Title VI staff is responsible for the day-to-day operation of the program and receives and investigates Title VI complaints that come through the complaint procedures process.



Title VI Program Requirements

As a recipient of federal financial assistance, SJRRC is required to develop and submit a Title VI Program to the FTA every three years. This program must include the following elements:

- Title VI Notice to Public: Description of how and where the public is notified of their rights under Title VI.
- Title VI Complaint Procedures & Form: Instructions on how and where to file a complaint.
- List of Investigations, Complaints, or Lawsuits: Title VI investigations, complaints, or lawsuits that have been received since the 2022 Program.
- Language Assistance Plan: Results of analysis of language barriers and strategies for communicating with individuals who have limited English proficiency.
- Public Participation Plan: A plan for how to engage with the public for changes to service.
- Makeup of Non-Elected Committee and Councils: The Rail Commission does not currently have non-elected committees, so this reporting is not required.
- Sub-recipient Monitoring: The Rail Commission does not currently have FTA funding sub-recipients that require monitoring.
- Facility Siting Analysis: Results of any facility siting analysis conducted since 2022 Program.
- Service Standards and Policies: Description of how SJRRC monitors different aspects of the service for equity.
- Evidence of Board Approval: The FTA requires proof that the Title VI Program was reviewed and approved by the Board.



Title VI Notice to Public

As part of this Program update, SJRRC will be updating the Title VI notice to make it simpler so it can be posted in more places and in both English and Spanish. The following notice will be posted in the lobby inside a display case located at 949 E. Channel Street, Stockton, CA at inside station kiosks. The notice will be provided in English and Spanish per the Language Assistance Program. A photo of the existing notice is shown in Figure 2.

Title VI Notice of Civil Rights

ACE Rail Service operates its programs and services without regard to race, color, or national origin, in accordance with Title VI of the Civil Rights Act.

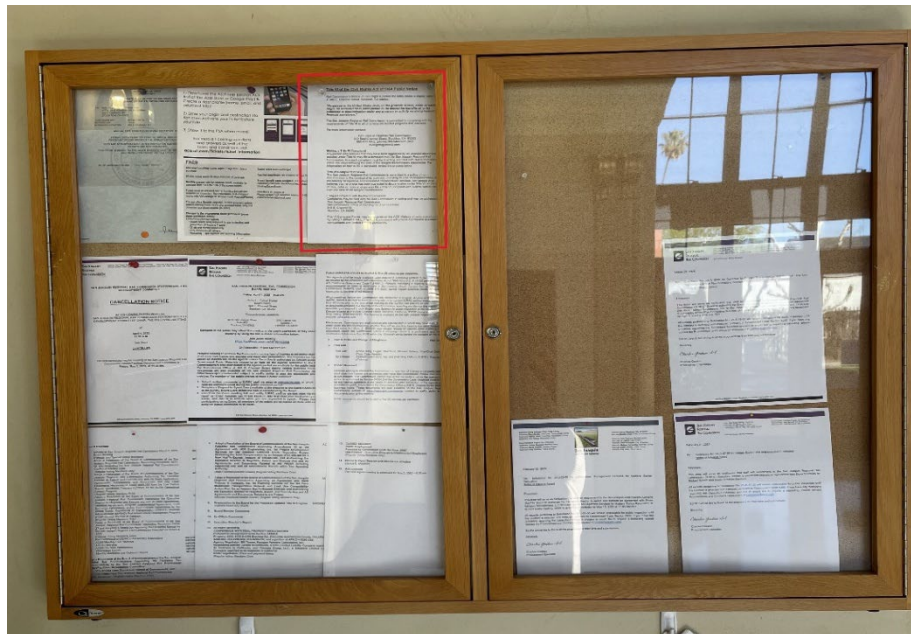
Requesting Information

For more information on ACE Rail Service's Title VI obligations, please visit our website at <https://www.sjrrc.com/civil-rights/>. You can also reach us by calling (209) 944-6279 or emailing civilrights@sjrrc.com

Filing a Complaint

To file a Title VI discrimination complaint, please complete the form on our website or contact us and we will send you a form. Completed forms can be mailed to 949 East Channel Street, Stockton, CA 95202 or emailed to civilrights@sjrrc.com

Figure 2: Photo of Existing Title VI Notice Posting



Title VI Complaint Procedures & Form

Any person who believes that they have been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with the San Joaquin Regional Rail Commission. Any such complaint must be in writing and filed with the Rail Commission within 180 days following the date of the alleged discriminatory occurrence.

Title VI Complaint Process

The Title VI Complaint Form is available as a PDF in English and Spanish on the <https://www.sjrrc.com/civil-rights/> webpage (see Attachment A). A copy of the Title VI Complaint Form may also be obtained by calling 1-800-411-RAIL (7245). The form may be submitted in person, by mail, or by email. SJRRC will provide appropriate assistance to complainants who are limited in their ability to communicate in English.

Complaints may also be filed without a form to the Rail Commission in writing and may be addressed to:

*San Joaquin Regional Rail Commission
Rail Commission Office of Civil Rights (Title VI Officer)
949 E. Channel St
Stockton, CA 95202*

Complaints may also be emailed to civilrights@sjrrc.com

Complaint Investigation

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

Based upon receipt of all the information required, SJRRC will investigate a Title VI complaint within 90 days of receipt. SJRRC will use its best efforts to respond to a Title VI complaint within 90 calendar days of its receipt of such complaint. Receipt of additional relevant information and/or simultaneous filing of a complaint with SJRRC and an external entity may expand the timing of the complaint resolution.

List of Transit-related Title VI Investigation, Complaints, and Lawsuits

The Title VI Officer flags any complaints made to the Rail Commission's Civil Rights Department that may be related to Title VI, regardless of whether the complaint specifically mentions Title VI.

At the time of preparation of this program, the Rail Commission reviewed complaints filed during the previous three-year period (2022-2025) and identified no complaints. Also, no Title VI lawsuits were filed during the same period.

Language Assistance Plan

The Rail Commission has updated the draft Language Assistance Plan (LAP) to address the needs of individuals with limited English proficiency (LEP). In accordance with the U.S. Department of Transportation's (US-DOT) four-factor analysis, LEP individuals were assessed to ensure the determination of need and outline measures to enhance accessible service. Similar to the 2022 Program, the draft plan identifies that the Rail Commission should take measures to translate key information into Spanish based on the analysis. The key findings are:

- As a result of the Four-Factor analysis, the most commonly encountered limited English proficient speaking population in the SJRRC service area are Spanish-speaking.
- 8.02% of the total population in Alameda, Santa Clara, and San Joaquin counties are Spanish-speaking and LEP.
- The updated LAP outlines measures to support LEP individuals, including bilingual assistance, interpreter services, and translated materials.
- SJRRC will also train staff in available language assistance services and provide notice to LEP persons both oral and written.
- The plan specifies that SJRRC will continuously review and update the LAP as necessary, considering feedback from complaints received, survey responses, available financial resources, and other relevant factors.

The full Language Assistance Plan is included as Attachment B.

Public Participation Plan

The purpose of the Public Participation Plan (PPP) is to inform and involve citizens of various programs, projects, and work activities. This includes, but is not limited to, lower income households, minorities, persons with disabilities, representatives from community and service organizations, tribal councils, and other public agencies.

For the 2025 Program, a new PPP was developed based on the results of the LAP, current SJRRC practices, and a review of peer agency PPPs. The PPP designates two types of changes to SJRRC's services, minor and major, which are shown in Figure 3. For each change type, recommended outreach strategies and LEP considerations are shown in Figure 4. **The full PPP is included as Appendix C.**

Figure 3: PPP Service Change Types

Major Changes	Minor Changes
Construction Project Scoping	Service Alerts
Fare Changes	Minor Schedule Changes
New Service	Construction Notice
Major Service Change	Temporary Closures

Figure 4: PPP Outreach Strategies and LEP Considerations

Recommended Strategies	Change Types	LEP Considerations	Notes
ACE Mobile App	Minor/Major	Spanish translation available through app	Post notices and announcements
Social Media	Minor/Major	Translation through social media platform	Post notices on Facebook, Instagram, and X
Media Relations	Minor/Major	Offer information to Spanish media outlets as needed	Includes press release and staff interviews
Customer Service Phone Number	Minor/Major	Offer Spanish translation	Provide info to staff regarding change
ACE Website	Minor/Major	Google translation feature available	Post notices and announcements on website
On-Board/Station Information	Minor/Major	Translate materials to Spanish	Printed signage and flyers
Community Engagement Events	Major Only	Have Spanish translator or staff available	Includes stakeholder groups and community organizations
Surveys	Major Only	Translate survey to Spanish	Gather feedback on major recommendations

Makeup of Non-Elected Committee and Councils

The FTA requires transit agencies to report on the demographic makeup of non-elected committees and councils to ensure that these advisory bodies reflect the diversity of the communities they serve. This reporting helps to promote inclusive decision-making processes and encourages the participation of minority populations, thereby fostering equity and preventing discrimination in transit planning and operation.

The Rail Commission is a joint powers authority (JPA) established by the County of San Joaquin, and the cities of Lodi, Stockton, Escalon, Ripon, Manteca, Lathrop, and Tracy. The Rail Commission is the designated owner, operator and policy-making body of the ACE Service. The Rail Commission Board is made up of eight (8) members total, six (6) of which are Regular Voting Members and are elected officials within San Joaquin County and two (2) Special Voting Members appointed by the Alameda County Transportation Commission (ACTC), also made up of elected officials.

SJRRC did not have any non-elected committees or councils during the 2022-2025 reporting period and therefore does not have any information to report.

Sub-recipient Monitoring

The FTA requires transit agencies to monitor sub-recipients to ensure that all entities receiving federal funds comply with Title VI regulations. This oversight helps to maintain accountability and transparency, ensuring that sub-recipients adhere to non-discrimination policies and provide equitable services to all populations. By monitoring sub-recipients, primary recipients can identify and address any potential issues of non-compliance, thereby preventing discriminatory practices and promoting fair access to transit services

SJRRC did not have funding sub-recipients during the 2022-2025 reporting period and therefore is not required to report on monitoring efforts.

Facility Siting Analysis

The FTA requires transit agencies to conduct and report the results of siting analyses to ensure that the location of facilities does not result in discriminatory impacts on minority or low-income populations. This requirement helps to prevent the exclusion or adverse effects on these communities by ensuring that decisions regarding the placement of transit facilities are made equitably. By analyzing and reporting siting decisions, transit agencies can identify and mitigate any potential disparate impacts, thereby promoting fair access to transit services and supporting environmental justice principles.

SJRRC did not site any new facilities during the 2022-2025 reporting period and therefore did not conduct any facility siting analyses.

Service Standards and Policies

The FTA requires transit agencies to establish service standards and policies to ensure that services are provided equitably and consistently across the system. By implementing clear service standards and policies, agencies can effectively monitor and manage their performance, identify areas for improvement, and ensure that all passengers receive fair and reliable service. This requirement also helps when operations may have a disparate impact on minority populations. SJRRC is considered a smaller agency and is not required to report on monitoring the standards in this report.

Vehicle Load

The vehicle load factor is defined as the ratio of the number of seats on a vehicle to the number of passengers. **The vehicle load standard is 1.2 during peak hours and 1.0 during off-peak hours.**

Vehicle Headway

Vehicle headway is a measurement of the time interval between two vehicles traveling in the same direction on the same route. **The ACE rail service headway standards are shown in Figure 5 and vary by direction, day type, and time period.**

Figure 5: Vehicle Headway Standard by Direction, Day Type, and Time Period

Service	Weekday AM Peak	Weekday PM Peak	Weekday Off Peak	Weekends
To San Jose	60 min	No Service	No Service	No Service
To Stockton	No Service	60 min	No Service	No Service

SJRRC also operates special event service for concerts and sporting events as needed.

On-Time Performance

Providing a reliable and dependable service for ACE passengers is highly dependent upon performance. ACE measures the trains' on-time performance daily. A train is considered on time if it is not more than six minutes late to a station as shown in the printed timetable. **ACE has a 90% On-Time Performance (OTP) goal.**

Service Availability

The service accessibility standard SJRRC is based on the percentage of residents living near the rail line versus the percentage near the stations is designed to ensure equitable access to transit services. This standard involves two key components:

- Percentage of Residents Near the Rail Line: This measures the proportion of the population living within 5 miles of the rail line itself. While proximity to the rail line indicates potential access to transit, it does not guarantee that residents can easily use the service, as they may still be far from actual boarding points.
- Percentage of Residents Near the Stations: This measures the proportion of the population living within five miles from the rail stations, where passengers can board and alight from trains. This is a more direct measure of accessibility, as it reflects the ease with which residents can access the transit service. Five miles is considered a reasonable catchment area for commuter rail stations based on a ten-minute drive.

By comparing these two percentages, SJRRC can identify gaps in accessibility and ensure that stations are strategically located to serve the maximum number of residents. This helps to prevent situations where a rail line passes through a densely populated area but lacks sufficient stations, thereby limiting the actual usability of the service for those residents. Ensuring a high percentage of residents near stations promotes equitable access and supports the goal of providing efficient and convenient transit options for all community members. **The accessibility standard for ACE is that at least 90% of residents living within 5 miles of a SJRRC rail alignment will also be within 5 miles of a SJRRC station.**

Distribution of Transit Amenities

The distribution of transit amenities standard for SJRRC ensures that passenger amenities are equitably distributed across the system. This standard aims to provide a consistent level of comfort, convenience, and safety for all passengers, regardless of the station they use. It is important to note that SJRRC does not own or operate all their stations and therefore does not have jurisdiction over the placement of amenities at the Fremont, Great America, Santa Clara, and San Jose stations.

For the SJRRC-owned stations, a minimum level of amenities has been identified to ensure that all passengers have access to them. **The standard is that all SJRRC-owned stations must have passenger shelters, Passenger Information Displays, printed schedules, and system map(s).**

Vehicle Assignment

The vehicle assignment standard currently does not apply to SJRRC since they operate only one route and the vehicles are equally distributed over the same service. However,

having the following vehicle assignment standard still makes sense as a proactive measure to prepare for future expansion and the addition of more routes.

As the service expands and new amenities may become available on vehicles, ACE will make a good faith effort to distribute those vehicles with added amenities in an equitable manner and shall not isolate them to a specific route or service. The current expansion will have the vehicles in rotation through two or more routes per journey, naturally distributing the vehicles and preventing the opportunity to segregate any vehicles to a single line or service (with the exception of potential new technologies that are limited to specific routes).

Board Approval

The update of the Title VI Program will be made available for public view online at www.sjrrc.com, at the Rail Commission's administrative office, and will be presented to the Rail Commission Board of Directors for review and approval at their May 2, 2025 meeting. **Minutes of the meeting where the Program was approved will be included as Attachment D to the final report.**



Appendix A: Title VI Complaint Forms

Title VI complaint Form
San Joaquin Regional Rail Commission (SJRRC)
Office of Compliance

SJRRC is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by Title VI of the Civil rights Act of 1964, as amended. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact the Title VI Coordinator by calling (209) 944-6241. The completed form must be returned to SJRRC Office of Compliance, Title VI Coordinator, 949 East Channel Street, Stockton, CA 95202.

Your Name:	Phone:
Street Address:	Alt Phone:
	City, State and Zip Code
Person(s) Discriminated against (if someone other than complainant): Name(s):	
Street Address, City, State and Zip Code:	

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

- ☐ RACE Date of Incident: _____
- ☐ COLOR
- ☐ NATIONAL ORIGIN (LIMITED ENGLISH PROFICIENCY) Time of Incident: _____

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

(Complete next page of form)

Title VI Complaint Form
San Joaquin Regional Rail Commission (SJRRRC)
Office of Civil Rights

Please describe the alleged discrimination incident (continued)

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

☐ YES ☐ NO

If so, list agency / agencies and contact information below

<u>Agency:</u> _____	<u>Contact Name:</u> _____
Street Address, City, State & Zip Code: _____	Phone: _____

<u>Agency:</u> _____	<u>Contact Name:</u> _____
Street Address, City, State, & Zip Code: _____	Phone: _____

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

_____ Complainant's Signature	_____ Date
----------------------------------	---------------

Print or Type Name of Complainant

Date Received: _____
Received By: _____

FORMULARIO DE QUEJAS Title VI
San Joaquin Regional Rail Commission (SJRRRC)
Oficina de Cumplimiento

SJRRRC centra sus esfuerzos en garantizar que nadie sea excluido de la participación en sus servicios ni que se nieguen los beneficios de éstos, con base en raza, color u origen nacional, en conformidad con las disposiciones del Title VI de la Ley de Derechos Civiles de 1964 y Las quejas bajo el Title VI deben presentarse en el transcurso de 180 días a partir de que ocurre la discriminación supuesta.

La información siguiente es necesaria para ayudarnos en el procesamiento de su queja. Si requiere ayuda para llenar este formulario, le agradeceremos que se dirija al Title VI Coordinator, al teléfono (209) 944-6241. El formulario completo debe devolverse al Title VI Coordinator, SJRRRC Office of Compliance, 949 East Channel Street, Stockton, CA 95202.

Su nombre:	Teléfono:
Dirección:	Segundo Teléfono:
Ciudad, Estado y Código Postal:	
Persona(s) que sufrieron discriminación (si es otra que el firmante):	
Nombre(s):	
Dirección, Ciudad, estado y Código Postal:	

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

- ☐ RAZA
☐ COLOR
☐ Origen nacional

Fecha del incidente: _____

Hora Del incidente: _____

Por favor, describa el supuesto incidente de discriminación. Proporcione los nombres y títulos de todos los empleados de SJRRRC involucrados, si cuenta con la información. Explique lo sucedido: quien considera que fue responsable; y otra información específica pertinente. (Por favor, use el reverso de este formulario si requiere espacio adicional.)

FORMULARIO DE QUEJAS Title VI
San Joaquin Regional Rail Commission (SJRRRC)
Oficina de Cumplimiento

Por favor, describa el supuesto incidente de discriminación (continuación).

¿Ha presentado alguna queja ante otra agencia federal, estatal o local con respecto a este incidente? (Marque Uno)

- ☐ Si
☐ No

Si la respuesta es afirmativa, por favor, a continuación enumere la agencia o agencias y la información de contacto:

Agencia: _____ Nombre de contacto: _____
Dirección, Ciudad, estado y Código Postal: _____

Agencia: _____ Nombre de contacto: _____
Dirección, Ciudad, estado y Código Postal: _____

Confirmo que he leído el cargo que se indica arriba y que es verdadero hasta donde tengo conocimiento.

Firma del declarante

Fecha

E o escriba en letra de imprenta el nombre del declarante

Fecha de recepción: _____

Recibido por: _____

(Llene el reverso de este formulario)

Appendix B: Language Assistance Plan

Language Assistance Plan

**San Joaquin Regional Rail Commission
(SJRRRC)**

May 2025

**949 E. Channel Street
Stockton, California 95202
(800) 411-RAIL
Civilrights@sjrrc.com**



**SAN JOAQUIN
REGIONAL
RAIL COMMISSION**

Contents

Introduction 4

Purpose of the Language Assistance Plan 5

Determination of Need..... 6

Language Assistance Plan 15

Summary of Language Assistance Plan Findings 18



Introduction

The San Joaquin Regional Rail Commission (SJRRRC) oversees the operation of the ACE, a commuter rail service connecting the Central Valley and the Bay Area. SJRRRC is based in Stockton, California and serves a diverse region spanning Alameda, Santa Clara, San Joaquin, and Stanislaus counties. ACE provides reliable transit options for commuters traveling between the Central Valley and major employment centers in the Bay Area. The service extends across a corridor of approximately 86 miles, with regional connections to Amtrak, Bay Area Rapid Transit (BART), Santa Clara Valley Transportation Authority (VTA) Light Rail, and local bus services.

Purpose of the Language Assistance Plan

On August 11, 2000, President William J. Clinton signed Executive Order 13166, “Improving Access Services for Persons with Limited English Proficiency,” which stated that recipients of Federal financial assistance must take reasonable steps to ensure meaningful access to their programs and activities for individuals who are limited-English proficient (LEP).

The U.S. Department of Transportation handbook titled “*Implementing the Department of Transportation’s Policy Guidance Concerning Recipients Responsibilities to Limited English Proficient (LEP Persons: A Handbook for Public Transportation Providers* (April 13, 2007)” (hereinafter “Handbook”), further expanded on the 2000 Executive Order by stating that Title VI of the Civil Rights Act of 1964 42 U.S.C. 2000d et seq., and its implementing regulations, provide that no person in the United State shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or otherwise subjected to discrimination under any program or activity that receives Federal financial assistance (Handbook, page 5).

The Handbook further adds that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination (Handbook, page 5).

LEP individuals, as defined by the 2023 United States Census American Community Survey, are any individuals who speak a language at home other than English as their primary language and who speak or understand English “not well” or “not at all.” Individuals who have a limited ability to read, write, speak, or understand English are considered LEP individuals. In SJRRC’s service area, according to the 2023 American Community Survey, approximately 19.58% of the counties’ residents describe themselves as not able to communicate in English very well.

SJRRC will take reasonable steps to ensure that all persons have meaningful access to its programs, services, and information at no additional cost. For many LEP individuals, public transit is a principal mode of transportation. It is therefore extremely important that SJRRC is able to communicate effectively with all its riders, both LEP and non-LEP individuals alike. This provides safer, more reliable, and more convenient, and accessible service for all the agency’s customers. For these reasons, SJRRC is committed to taking the following steps to ensure meaningful access for LEP individuals to this agency’s services

This plan will demonstrate the efforts that SJRRC has undertaken to make its service as accessible as possible to all persons irrespective of their ability to communicate in English. Additionally, SJRRC welcomes any comments or suggestions that would

further improve the effectiveness of this Plan and/ or our ability to communicate more effectively with our customers.

Determination of Need

In order to develop this policy, SJRRC has followed the U.S. Department of Transportation (US-DOT) four-factor analysis which considers the following factors:

1. The number proportion of LEP persons in the service area who may be served or are likely to encounter a SJRRC program, activity, or service.
2. The frequency with which LEP persons come in contact with SJRRC programs, activities, or services.
3. The nature and importance of programs, activities or services provided by SJRRC to the LEP population.
4. The resources available to SJRRC and overall cost to providing LEP assistance.

This analysis helps determine whether SJRRC's work is sufficient to ensure that service is accessible to all those who rely upon fixed-route service for their transportation needs. This plan will also include information on future goals and tasks for SJRRC to pursue to improve its accessibility to LEP persons.

FACTOR 1: The Number and Proportion of LEP Persons Served or Encountered in SJRRC's Service Area

An analysis of U.S. Census 2023 American Community Survey (ACS) 1-Year Estimated Detailed Tables data provides a profile of LEP individuals in Alameda, Santa Clara, and San Joaquin County. This data is used to determine the approximate number of LEP persons age five years or older. Table 1 shows the number and percent of persons who speak English "less than very well," by language spoken at home, and who are age five and older in Alameda, Santa Clara, and San Joaquin County. As indicated, 49.08% of the population speaks only English, while 19.58% of the population is considered limited English proficient. The remaining 31.35% speaks another language and English "very well."

The most commonly encountered LEP persons in the SJRRC service area speak Spanish. Spanish speakers represent 18.72% of the total population of Alameda, Santa Clara, and San Joaquin County. 8.02% of the residents of three counties are Spanish-speaking and limited English proficient. Spanish is the most commonly spoken language (outside of English) used in Alameda, Santa Clara, and San Joaquin County.

In the SJRRC service area, 10.7% of the total population is limited English proficient and speak neither English nor Spanish. The most common spoken languages that are

limited English proficient after Spanish are Chinese (4.15%), Vietnamese (2.11%), and Tagalog (1.03%).

In order to ensure that LEP populations have sufficient access to SJRRC's commuter rail, it is important to determine where LEP populations are located and concentrated. Identifying census tracts where the proportion of LEP persons exceeds the proportion of LEP persons in the population as a whole is an important part of this analysis. Figure 1 shows the concentration of LEP Spanish speaking populations in the census tracts served by San Joaquin Regional Rail Commission, indicating that SJRRC adequately serves all areas of high LEP concentrations.

Table 1: LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER

Language	Estimate	% of Total Population over 5 yrs old
Total	4,073,766	100.00%
Speak only English	1,999,245	49.08%
Speak another language and English "very well"	1,276,944	31.35%
Speak English less than "very well"	797,577	19.58%
Spanish	762,528	18.72%
Speak English "very well"	435,660	10.69%
Speak English less than "very well"	326,868	8.02%
French (incl. Cajun)	20,544	0.50%
Speak English "very well"	17,034	0.42%
Speak English less than "very well"	3,510	0.09%
Haitian	1,039	0.03%
Speak English "very well"	992	0.02%
Speak English less than "very well"	47	0.00%
Italian	8,015	0.20%
Speak English "very well"	6,358	0.16%
Speak English less than "very well"	1,657	0.04%
Portuguese	20,280	0.50%
Speak English "very well"	13,167	0.32%
Speak English less than "very well"	7,113	0.17%
German	13,243	0.33%
Speak English "very well"	11,256	0.28%
Speak English less than "very well"	1,987	0.05%
Yiddish, Pennsylvania Dutch or other West Germanic languages	2,599	0.06%
Speak English "very well"	2,483	0.06%
Speak English less than "very well"	116	0.00%
Greek	4,610	0.11%
Speak English "very well"	4,348	0.11%

Language	Estimate	% of Total Population over 5 yrs old
Speak English less than "very well"	262	0.01%
Russian	20,255	0.50%
Speak English "very well"	13,897	0.34%
Speak English less than "very well"	6,358	0.16%
Polish	2,157	0.05%
Speak English "very well"	1,755	0.04%
Speak English less than "very well"	402	0.01%
Serbo-Croatian	6,822	0.17%
Speak English "very well"	4,479	0.11%
Speak English less than "very well"	2,343	0.06%
Ukrainian or other Slavic languages	5,179	0.13%
Speak English "very well"	3,967	0.10%
Speak English less than "very well"	1,212	0.03%
Armenian	1,922	0.05%
Speak English "very well"	1,506	0.04%
Speak English less than "very well"	416	0.01%
Persian (incl. Farsi, Dari)	41,842	1.03%
Speak English "very well"	28,150	0.69%
Speak English less than "very well"	13,692	0.34%
Gujarati	19,125	0.47%
Speak English "very well"	16,252	0.40%
Speak English less than "very well"	2,873	0.07%
Hindi	92,919	2.28%
Speak English "very well"	79,680	1.96%
Speak English less than "very well"	13,239	0.32%
Urdu	15,877	0.39%
Speak English "very well"	12,399	0.30%
Speak English less than "very well"	3,478	0.09%
Punjabi	51,163	1.26%
Speak English "very well"	31,523	0.77%
Speak English less than "very well"	19,640	0.48%
Bengali	9,647	0.24%
Speak English "very well"	7,911	0.19%
Speak English less than "very well"	1,736	0.04%
Nepali, Marathi, or other Indic languages	27,008	0.66%
Speak English "very well"	22,344	0.55%
Speak English less than "very well"	4,664	0.11%
Other Indo-European languages	10,196	0.25%
Speak English "very well"	6,801	0.17%
Speak English less than "very well"	3,395	0.08%

Language	Estimate	% of Total Population over 5 yrs old
Telugu	39,523	0.97%
Speak English "very well"	33,651	0.83%
Speak English less than "very well"	5,872	0.14%
Tamil	40,788	1.00%
Speak English "very well"	37,964	0.93%
Speak English less than "very well"	2,824	0.07%
Malayalam, Kannada, or other Dravidian languages	32,174	0.79%
Speak English "very well"	27,926	0.69%
Speak English less than "very well"	4,248	0.10%
Chinese (incl. Mandarin, Cantonese)	348,158	8.55%
Speak English "very well"	179,101	4.40%
Speak English less than "very well"	169,057	4.15%
Japanese	19,986	0.49%
Speak English "very well"	12,368	0.30%
Speak English less than "very well"	7,618	0.19%
Korean	45,987	1.13%
Speak English "very well"	25,705	0.63%
Speak English less than "very well"	20,282	0.50%
Hmong	6,525	0.16%
Speak English "very well"	4,032	0.10%
Speak English less than "very well"	2,493	0.06%
Vietnamese	150,302	3.69%
Speak English "very well"	64,292	1.58%
Speak English less than "very well"	86,010	2.11%
Khmer	17,047	0.42%
Speak English "very well"	8,358	0.21%
Speak English less than "very well"	8,689	0.21%
Thai, Lao, or other Tai-Kadai languages	6,247	0.15%
Speak English "very well"	3,044	0.07%
Speak English less than "very well"	3,203	0.08%
Other languages of Asia	17,008	0.42%
Speak English "very well"	10,352	0.25%
Speak English less than "very well"	6,656	0.16%
Tagalog (incl. Filipino)	126,753	3.11%
Speak English "very well"	84,884	2.08%
Speak English less than "very well"	41,869	1.03%
Ilocano, Samoan, Hawaiian, or other Austronesian languages	26,250	0.64%
Speak English "very well"	17,335	0.43%

Language	Estimate	% of Total Population over 5 yrs old
Speak English less than "very well"	8,915	0.22%
Arabic	18,964	0.47%
Speak English "very well"	13,983	0.34%
Speak English less than "very well"	4,981	0.12%
Hebrew	12,580	0.31%
Speak English "very well"	11,225	0.28%
Speak English less than "very well"	1,355	0.03%
Amharic, Somali, or other Afro-Asiatic languages	11,248	0.28%
Speak English "very well"	6,833	0.17%
Speak English less than "very well"	4,415	0.11%
Yoruba, Twi, Igbo, or other languages of Western Africa	8,459	0.21%
Speak English "very well"	7,675	0.19%
Speak English less than "very well"	784	0.02%
Swahili or other languages of Central, Eastern, and Southern Africa	1,851	0.05%
Speak English "very well"	1,794	0.04%
Speak English less than "very well"	57	0.00%
Navajo	33	0.00%
Speak English "very well"	33	0.00%
Speak English less than "very well"	-	0.00%
Other Native languages of North America	2,094	0.05%
Speak English "very well"	1,830	0.04%
Speak English less than "very well"	264	0.01%
Other and unspecified languages	5,574	0.14%
Speak English "very well"	2,597	0.06%
Speak English less than "very well"	2,977	0.07%

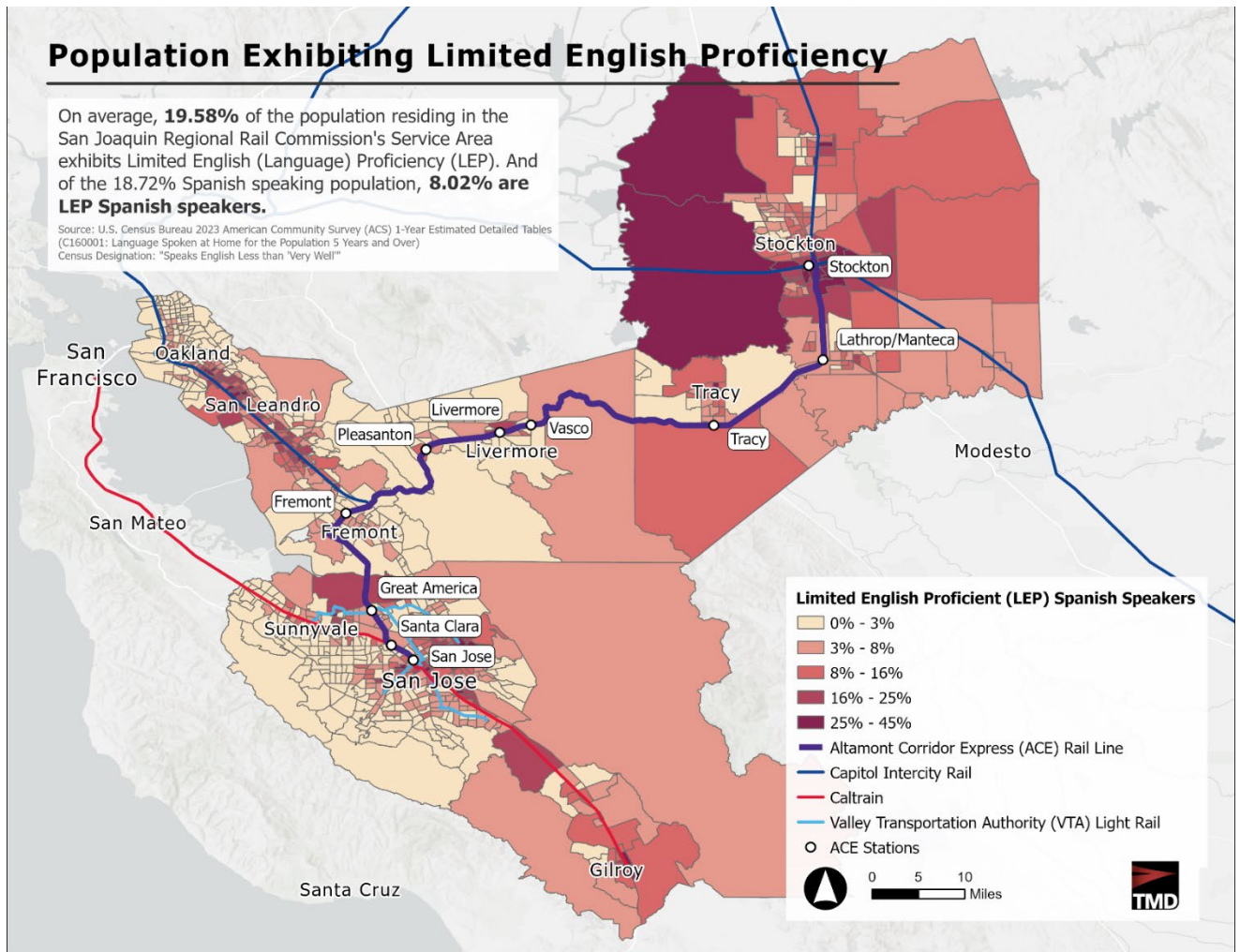
Source: U.S. Census Bureau 2023 American Community Survey (ACS) 1-Year Estimated Detailed Tables (B160001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over)

Figure 1: Population Exhibition Limited English Proficiency

Population Exhibiting Limited English Proficiency

On average, **19.58%** of the population residing in the San Joaquin Regional Rail Commission's Service Area exhibits Limited English (Language) Proficiency (LEP). And of the 18.72% Spanish speaking population, **8.02% are LEP Spanish speakers.**

Source: U.S. Census Bureau 2023 American Community Survey (ACS) 1-Year Estimated Detailed Tables (C160001: Language Spoken at Home for the Population 5 Years and Over)
Census Designation: "Speaks English Less than 'Very Well'"



FACTOR 2: Frequency of Contact of LEP Individuals with SJRRC's Programs, Activities, and Services

The Federal guidance for this factor recommends that agencies should, as accurately as possible, assess the frequency with which they have contact with LEP individuals from different language groups. Assessing the frequency with which LEP populations come in contact with San Joaquin Regional Rail Commission's programs, activities, and service helps the agency determine which languages need to be considered for language services. Generally, "the more frequent the contact, the more likely enhanced language services will be needed." Strategies that help serve an LEP person on a one-time basis will be very different than those that may serve LEP persons daily. For purposes of estimating the frequency of contact with LEP individuals, SJRRC reviewed its programs and services.

The Rail Commission assessed the frequency with which staff have, or could have, contact with LEP persons. The following "touch points" and frequencies have been identified:

Table 2: TOUCH POINTS & FREQUENCIES

Touch Points	Frequency
Conductors	Frequently
Passenger Service Agents	Frequently
Customer Service Agents	Frequently
ACE Information Line (800) 411-RAIL	Often
Schedule/Printed Materials	Often
Interior Signage	Frequently
Station Signage	Frequently
Shuttle Drivers	Frequently
Shuttle Signage	Frequently
Website	Often
Social Media	Often
Ticket Vendors	Often
Print Media	Infrequent
Broadcast Media	Infrequent
Public Relations Media	Occasionally
ACE Special Events	Occasionally

As demonstrated by *Table 2*, SJRRC conductors, service agents and signage have frequent contact with LEP individuals.

FACTOR 3: The Nature or Importance of SJRRC Services, Programs, or Activities to LEP Individuals

Per the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons, “The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed.”

According to the 2023 ACE Passenger Survey, approximately 11% of riders speak English less than ‘very well,’ and 20% speak a primary language other than English at home (See Table 3 and Table 4). These numbers closely reflect the LEP Spanish-speaking population in the SJRRC’s service area (as noted in Factor 1), indicating that, overall, riders share similar demographics with local residents. Since the largest concentration of Limited English Proficient individuals in the SJRRC service area is Spanish speaking, Passenger Services staff—both onboard and in customer service—are the most likely to encounter LEP individuals. Additionally, staff are likely to interact with LEP individuals at ticket sales locations, connecting shuttle services, events, and public meetings.

Table 3: English Ability of Surveyed Riders (Respondent) Profile

English Ability	Percent of Respondents
Very Well	88%
Well	10%
Not well	1%
Not at all	0%

Source: ACE Passenger Survey (2023)

Table 4: Primary Language Spoken at Home of Surveyed Riders (Respondent) Profile

Primary Language Spoken at Home	Percent of Respondents
English	81%
Spanish	8%
Chinese	2%
Tagalog	2%
Other	8%

Source: ACE Passenger Survey (2023)

San Joaquin Regional Rail Commission provides a critical service, ACE Rail, for commuters from the Central Valley to major employment centers in the Bay Area. Approximately 88% of ACE riders depend on the service for their daily work commute (See Table 5). Additionally, 76% of riders indicated that they arrived by car and parked at the ACE boarding station, taking trips in the westward direction in the morning (See Table 6). Riders primarily use their vehicles for first-last mile connectivity, such as

driving to the station and parking before completing the majority of their commute by train. Despite having access to a personal vehicle, the majority still rely on ACE as their primary mode of transportation for their commute trip.

Table 5: Trip Purpose of Surveyed Riders (Respondent) Profile

Trip Purpose	Percent of Respondents
Commute to/from work	88%
Commute to/from school	6%
Visiting family/friends	3%
Personal Business	1%
Entertainment/recreation	0%
Shopping	0%
Other	0%

Source: ACE Passenger Survey (2023)

Table 6: Access Mode of Surveyed Riders (Respondent) Profile

Access Mode To ACE Boarding Station (Westward Direction)	Percent of Respondents (who made a round-trip)
Arrived by car and parked at station	76%
Dropped off	13%
Biked/Scooter	4%
Walked/Wheelchair	4%
Local bus	2%
Amtrak train	0%
App-based rideshare	0%
Other	1%

Source: ACE Passenger Survey (2023)

FACTOR 4: The Resources Available to SJRRC and the Costs of Providing LEP Assistance

The San Joaquin Regional Rail Commission is committed to ensuring that resources are used to reduce the barriers that limit access to its information and service by LEP Persons. Thus, SJRRC has assessed its available resources that could be used for providing LEP assistance, including determining how much a professional interpreter and translation service would cost on an as-needed basis, which of its documents would be the most valuable to be translated if the need should arise, and taking an inventory of available organizations that the Rail Commission could partner with for outreach and translation efforts. Additionally, SJRRC is committed to improving LEP access to information and services.

Based on the four-factor analysis, the Rail Commission developed its LEP Plan as outlined in the following section.

Language Assistance Plan

In developing a Limited English Proficiency Plan, FTA guidance recommends the implementation of a Language Assistance Plan, which includes the following five elements:

- Identifying LEP individuals who need language assistance
- Providing language assistance measures
- Training staff
- Providing notice to LEP persons of available non-English assistance
- Monitoring and updating the LEP Plan

1) Identifying LEP Individuals Who Need Language Assistance

Rail Commission staff may identify a LEP person who needs language assistance by:

- Examine Passenger Services Agent (PSA) and Customer Service Representative (CSR) records for language assistance requests that have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future similar events
- When the Rail Commission sponsors an ACE event (e.g. – workshops, special trains, events, meetings, etc.), staff will greet participants as they arrive. By informally engaging participants in conversation, it is possible to informally gauge each attendee's English proficiency.
- Have Language Identification Flashcards available at Rail Commission events near the registration table. Individuals self-identifying as persons not proficient in English may not be able to be accommodated with translation assistance at the event, but it will assist in identifying language assistance needs for future events
- Have Language Identification Flashcards on all rail cars and transit vehicles to assist staff in identifying specific language assistance needs of passengers. If such individuals are encountered, staff will be instructed to try to obtain contact information to give to Passenger Services Lead, or designated personnel for follow-up. CSRs will also be instructed to obtain contact information from LEP individuals they encounter, either in person or over the phone, recording passengers' requests for language assistance in the customer service database.

Furthermore, based on the Four-Factor analysis findings, the most frequently encountered LEP population are Spanish speaking (8.02%), which exceeds the 5%

Safe Harbor Threshold. SJRRC will continue to provide language assistance of important public documentation in Spanish to address the community need.

2) Providing Language Assistance Measures

There are numerous language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which Rail Commission staff respond to LEP persons, whether verbally in person, by telephone, or in writing.

Rail Commission staff will assist a LEP person who needs language assistance by:

- Rail Commission will continue to network with local human service organizations that provide services to LEP individuals and seek opportunities to provide information on Rail Commission programs and services
- Rail Commission will strive to make bilingual assistance available at community events, public hearings and Board of Director meetings
- Placement of statements in notices and publications that interpreter services are available for these meetings, with 48-hour advance notice
- Survey staff annually on their experience concerning any contacts with LEP persons during the previous year
- Provide Language Identification Flashcards at each station, onboard the ACE, and in all shuttle vehicles
- Provide telephone information in English from 4:00a.m. to 8:45p.m. Monday through Friday, as part of SJRRC's Multicultural Facilities. The Rail Commission also has staff who speak Spanish, available upon request.
- Post the Rail Commission Title VI Policy, Title VI Complaint Form (Appendix A) in English and Spanish on the ACE rail website
- Provide group travel training to LEP persons with the assistance of bilingual staff
- Include language that Bilingual fluency in English and Spanish is desirable on PSA and CSA recruitment flyers and onboard recruitment posters
- The ACE website, www.acerail.com, features Google Translate language service
- When an interpreter is needed for a language other than Spanish, in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers. Professional translation services are available from the Northern California Translators Association (www.ncta.org). Also, a list will be developed from internal Rail Commission staff.

3) Training Staff

The San Joaquin Regional Rail Commission will continue to train staff on its role and responsibilities in providing meaningful access to services for LEP persons:

- Develop curriculum and corresponding PowerPoint to educate Rail Commission staff on the Title VI LEP requirements for providing meaningful access to services for LEP persons
- Provide staff with a description of language assistance services offered by the Rail Commission
- Provide staff with specific procedures to be followed when encountering a LEP person, including how to handle a potential Title VI/LEP complaint
- Instruct staff on the use of Language Identification Flashcards

4) Providing Notice to LEP Persons

The San Joaquin Regional Rail Commission will provide both oral and written communications to LEP individuals as follows:

- ACE schedules and brochures, as well as all notices for public meetings, contain information informing potential travelers and meeting attendees that special services are available by contacting the Rail Commission
- Accommodate the passengers' needs through language translation provided by Rail Commission staff who speak languages other than English or through the Google translate tool available online
- Offer general information, such as operation hours of the Stockton Station (Administrative Offices), etc., on the customer service line (800-411-RAIL)
- Professionally translate the following vital documents into Spanish (vital documents are defined as those documents without which a person would be unable to access services) to ensure accuracy of information
 - ACE Schedule which has information on fares, accessibility, locations where discount tickets and passes are sold and general riding information
 - Interior stickers and posters at ACE Stations that display safety or system policy information
 - Online surveys
- Provide information in English and Spanish about Rail Commission's nondiscrimination policies and information on the local/federal complaint process and place on the ACE website and available at public meetings
- The following written communications should be made available upon request in both English and Spanish:
 - Temporary signs at ACE Stations informing passengers of any delays, schedule changes, or shuttle issues
 - Onboard "take one" flyers containing information about route changes, rider alerts, fare increases and public hearings
 - Interior cards/posters displaying special promotions

- Provide a statement on the Rail Commission website that SJRRC will make reasonable accommodations to translate ACE service-related documents into Spanish with seven days advance notice.

5) Monitoring and Updating the LEP Plan

This plan is designed to be flexible and should be viewed as a work in progress. As such, it is important to consider whether new documents and services need to be made accessible for LEP persons, and to monitor changes in demographics and types of services. The Rail Commission will review and update the LEP Plan as necessary during the development of their Title VI plan updates.

How the Rail Commission will examine and update the LEP Plan:

- Record and report on the number of LEP persons encountered annually through Rail Commission's Passenger Services
- Determine how the needs of LEP persons have been addressed
- Determine the current LEP population in the service area and 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 the Rail Commission's financial resources are sufficient to fund language assistance resources needed
- Determine whether the Rail Commission and its contractor have fully complied 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
- Obtain input from customers via Rail Commission's annual Passenger Satisfaction Survey

Summary of Language Assistance Plan Findings

As a result of the Four-Factor analysis, the most commonly encountered limited English proficient speaking population in the San Joaquin Regional Rail Commission's service area are Spanish-speaking. Approximately 8.02% of the total population in the service area counties (Alameda, Santa Clara, and San Joaquin) are Spanish-speaking and LEP. The updated LAP will outline measures to support LEP individuals, including bilingual assistance, interpreter services, and translated materials. The Rail Commission will also train staff in available language assistance services and provide notice to LEP persons both oral and written. Additionally, the plan specifies that SJRRC

will continuously review and update the LAP as necessary, considering feedback from complaints received, survey responses, available financial resources, and other relevant factors.

Appendix C: Public Participation Plan

Public Participation Plan

**San Joaquin Regional Rail Commission
(SJRRC)
May 2024**

**949 E. Channel Street
Stockton, California 95202
(800) 411-RAIL
Civilrights@sjrrc.com**



Contents

Introduction 4

Public Participation Process 7

Public Participation Tools & Strategies..... 9



Introduction

The San Joaquin Regional Rail Commission (SJRRRC) oversees the operation of the ACE, a commuter rail service connecting the Central Valley and the Bay Area. SJRRRC is based in Stockton, California and serves a diverse region spanning Alameda, Santa Clara, San Joaquin, and Stanislaus counties. SJRRRC is strongly committed to seeking and encouraging public participation in the overall regional transportation planning process and in the planning process for its individual projects. Public meetings, newsletters, fact sheets, surveys, email messages, social media, and web pages are just a few examples of the types of tactics SJRRRC implements in its effort to solicit input from the public regarding agency services and initiatives.

Title VI

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. San Joaquin Regional Rail Commission operates its programs and services without regard to race, color or national origin in accordance with Title VI of the Civil Rights Act of 1964.

One critical concern addressed by Title VI is the language barrier that Limited English Proficiency (LEP) persons face with respect to accessing information about and using transit service. Transit operators must ensure this group has adequate access to the agency's programs and activities, meaning that public participation opportunities should also be accessible to those who have a limited understanding of English (spoken and/or written).

Executive Order 12989

The Rail Commission recognizes the importance of reaching out to and including traditionally under-represented populations (e.g. racial and ethnic minorities, low-income individuals, persons with limited English proficiency, and persons with disabilities) in decision-making. The SJRRC Public Participation Plan (PPP) has been designed to be inclusive of all populations in the SJRRC service area and includes a detailed public participation process, clear goals, and a variety of public participation methods to provide information and invite the public to give input throughout decision-making processes, and performance measures and objectives.

Purpose of the Public Participation Plan

Public participation processes invite stakeholders to partake directly in agency decision-making, and express their concerns, desires and values. The SJRCC Public Participation Plan (PPP) serves as a roadmap to ensure the public has sufficient access to information and can provide meaningful input into decisions made regarding the future of ACE service. The PPP has been developed through research conducted by staff, inclusion of best practices methods, feedback from previous outreach and public participation activities, and insights provided by peer agencies with the goal of improving how the Rail Commission interacts with its customers on a daily basis, as well as in larger, intermittent service planning efforts.

This document discusses the strategies used to attain feedback for the public participation plan and the process of creating the public participation plan. This plan is to be used when San Joaquin Regional Rail Commission embarks upon service planning activities or other activities in which public participation plays a critical role in a successful outcome. Additionally, the Public Participation Plan serves as a "living document." The PPP is intended to continue to evolve to meet the changing needs of the

communities San Joaquin Regional Rail Commission serves through updates to actively address stakeholder concerns and requests.

Goals and Guiding Principles

Purpose of the PPP:

1. **To inform the public** about SJRRC's transportation issues and planning processes
2. **To establish the process** through which the public can express concerns, desires, and values
3. **To reach a wide range of the SJRRC's customers**, and increase the participation of under-represented populations
4. **To ensure the SJRRC's programs and activities** reflect the community values

The overall goal of SJRRC's Public Participation Plan is to establish a framework for achieving mutual understanding of project issues among stakeholders involved in and impacted by various projects and/or service changes. SJRRC engages in public outreach and executes various public involvement plans to ensure that its stakeholders—who include federal, state, and local officials, local residents and business owners and other interested parties receive information regarding the status of the relevant project or service change and participate in the decision-making and planning process. The outreach goals, objectives, and tactics for each project, policy and/or service change vary and are determined by staff during the development of the associated public involvement plan.

San Joaquin Regional Rail System Overview

ACE is governed by the San Joaquin Regional Rail Commission and provides reliable transit options for commuters traveling between the Central Valley and major employment centers in the Bay Area. The service extends across a corridor of approximately 86 miles, with regional connections to Amtrak, Bay Area Rapid Transit (BART), Santa Clara Valley Transportation Authority (VTA) Light Rail, and local bus services. The service area is geographically and ethnically diverse, containing both dense urban cores and suburban landscape with residents from an array of different backgrounds. These factors make the SJRRC service area unique. The Rail Commission operates four weekday round-trip rides across 10 stations with 8 trains. As

necessary, Caltrain also provides additional or modified train service for holidays or special events that occur year around.

Public Participation Process

Federal Laws and Regulations

Federal regulations and guidance advise that there must be early and continual involvement of elected officials, agency representatives, citizens and other interested parties throughout the transportation planning and programming process. Such regulations and guidance have directed SJRRC's public involvement efforts and efforts to improve access to SJRRC's transportation decision-making process by low-income, minority and Limited English Proficient (LEP) populations as required by Title VI of the Civil Rights Act of 1964, Executive Orders 12898 and 13166 and related authority, Title VI Requirements and Guidelines for Federal Transit Administration (FTA) Recipients, Circular 4702.1B and Environmental Justice Policy Guidance for FTA Recipients, Circular 4703.1. The Public Participation Plan and all resulting public involvement plans created for current projects are developed to adhere to these requirements and advice.

State and Local Laws and Regulations

San Joaquin Regional Rail Commission relies on multiple strategies to encourage participation by stakeholders, individuals, groups and organizations that comprise the public by developing its public involvement plans consistent with the public involvement strategies employed by the state and local governments.

Public involvement is a key component of the transportation planning process and is the responsibility of the local metropolitan planning organizations (MPOs) in developing local Transportation Improvement Programs (TIP). SJRRC cooperates with its local MPO in providing for public input and participation in the transportation planning process which is outlined in the Transportation Public Involvement Plan (TPIP) in accordance with the federal requirements described in 23 CFR Part 450.

Limited English Proficiency

SJRRC engages limited English proficient (LEP) populations in its public participation processes through the use of its Limited English Proficiency Plan (LEP Plan). Here are examples of targeted outreach efforts to minority populations:

- Under this plan SJRRC provides notices regarding the public hearing in the identified and approved LEP languages.
- Notices regarding all Title VI meetings are posted in these identified languages. Additionally, SJRRC translates all meeting notices, presentations, and comment

in English and Spanish. This format allows LEP Spanish Speakers to actively participate in and leave comments for all Title VI presentations

- SJRRC has developed its LEP Plan to be consistent with Title VI of the Civil Rights Act of 1964, DOT's Title VI regulations (49 CFR part 21), FTA Title VI Circular 4702.1B, and Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons (70 FR 74087, December 14, 2005).

In developing this Public Participation Plan, SJRRC has taken reasonable steps to ensure that individuals who have limited-English proficiency have meaningful access to benefits, services, information, and other important portions of the Rail Commission's programs and activities.

SJRRC's LEP Plan consists of two main components. The first component is the Four Factor Analysis, which SJRRC has used to determine its key affected LEP populations. The second component is an Access Plan which addresses how SJRRC is to provide services to LEP individuals, train employees, and monitor and update the LEP Plan. To date SJRRC has identified Spanish speakers as the main LEP language population served by the ACE system. This is consistent with the previous Title VI Report submittal in September 2022 and the Four Factor Analysis has been prepared for the 2022-2025 LEP Plan. SJRRC already provides translation service to most of its customer touch points (vital website content, oral and written translation for service plan changes and targeted promotional materials) in Spanish. SJRRC will continue to provide this service under the updated LEP Language Access Plan.

SJRRC developed its LEP Language Access Plan based upon the results of the Four Factor Analysis. The Plan focuses on analyzing the points of potential contact and interactions with LEP individuals and communities. Some frequent touch points identified include conductors, passenger service agents, customer service agents, and various signage. Plan execution is focused on training staff to utilize the resources available to them, such as the telephone language line service and translated promotional material, as appropriate. SJRRC continuously monitors the program and evaluates the program for future update needs.

Members of LEP populations in particular are served through the use of translated documents, translated web pages on the San Joaquin Regional Rail Commission website and interpreters made available in person and on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers. Professional translation services are available from the Northern California Translators Association (www.ncta.org). Also, a list will be developed from internal Rail Commission staff.

Public Participation Tools & Strategies

Overview

Using the regulations and guidance provided in federal and state law, SJRRC staff will apply the principles and guidance set out in this document to inform its efforts to create public involvement plans that will ensure public participation in the decision-making process.

Methodology and Public Participation Tools

SJRRC staff will evaluate the policy, program, study, or other activity for which public involvement is either required or desirable to determine the most appropriate methods for involving the public in the decision-making process. SJRRC staff is not limited to only those specific activities, and is encouraged to employ, within the resource limits of SJRRC, best practices for engaging the public.

As part of the public participation process considerations, certain tools and strategies will be utilized based on the change type: minor or major. Minor changes include service alerts, minor schedule changes, construction notices, and temporary closures. Major change types include construction project scoping, fare changes, new services, and major service changes. Additionally, public participation tools or strategies can vary depending on the project scope. Often many tools will be required. When choosing the appropriate tools, several factors should be considered such as:

- The number and type of stakeholders
- The geographic region of the project
- Available budget and resources
- Communication and language requirements
- Desired outcome and results
- Issues or concerns stakeholders will consider most pertinent

Table 1. Change Types

Major Changes	Minor Changes
Construction Project Scoping	Service Alerts
Fare Changes	Minor Schedule Changes
New Service	Construction Notice
Major Service Change	Temporary Closures

The following section details the tools and strategies for ensuring the public has access to the information it needs to participate in the Rail Commission's planning and policy development efforts.

1. ACE Rail Mobile App

The ACE Rail Mobile App serves as a direct communication tool, providing riders with real-time updates on schedules, service changes, and alerts. As a user-friendly and cost-effective platform, the free app ensures that important information reaches stakeholders quickly and efficiently. In addition to posting notices and announcements, the mobile app includes translation services for limited English-speaking users.

2. Social Media

Currently, San Joaquin Regional Rail posts notices and announcements on ACE's social media, including Facebook, Instagram, and X (formerly Twitter).

Social media platforms allow users to have direct interaction with agency representatives for immediate interaction. Being relatively easy to use and less costly than other strategies, the Rail Commission can creatively circulate current and important information. In working with community partners and government entities, social media posts are easy to share and reach a wider audience. Live webcasting on these platforms allows staff to receive and answer questions in real time.

3. Media Relations

Media relations, or earned media, provides SJRRC with valuable, cost-effective publicity through new coverage, interviews, and community discussions. Additionally, ethnic media and local outlets can help reach minority communities. The Rail Commission can tailor messages to each audience, provide contact information for public inquiries, and, when appropriate, offer a multilingual spokesperson to enhance accessibility.

4. ACE Customer Service and Information Line

The San Joaquin Regional Rail Commission provides general information through its customer service and information line at (800) 411-RAIL. For project-specific inquiries or public feedback, this dedicated line serves as an accessible and convenient resource. Trained Customer Service Representatives will be equipped with relevant project details to assist callers effectively. Additionally, the Rail Commission will provide Spanish translation services as needed to ensure inclusive communication.

5. Online ACE Website

The Rail Commission oversees the ACE website (www.acerail.com), which provides specific updates and news on service alerts. The website allows stakeholders to review project details, submit feedback, and stay informed about

upcoming meetings and community engagement efforts. The website also features multilingual support and accessibility tools to ensure all riders can access critical information.

6. On-Board/Station Information Resources

Riders and community members can access key information regarding service changes, fare changes, and public participation opportunities through on-board and station information resources. Printed materials such as handouts, seat-drop flyers, and pamphlets can be made available on trains and at stations, along with Spanish translations. Additionally, visual messaging and audio announcements can keep passengers informed, along with the Spanish translation.

7. Meetings

The San Joaquin Regional Rail Commission (SJRRRC) issues formal notices and holds public hearings to engage community members in discussions about project changes. During these hearings, attendees are presented with an official statement outlining the proposed changes, and their comments are recorded for consideration. These hearings provide a platform for community members to voice their perspectives in a public setting. Additionally, open Board meetings and Board agendas, which are posted on the website, allow for further public feedback and comments. SJRRRC will provide translation services as needed to ensure accessibility for all participants.

8. Community Engagement Events

Community Engagement Events provide an effective platform for direct interaction with stakeholders, especially during major ACE service changes. These events allow the Rail Commission to collect valuable feedback and gain insights from the community. Information tables, kiosks, and booths at public gathering spaces facilitate open communication and ensure that the public has easy access to relevant project details. Community engagement events also offer an opportunity for community members to ask questions, voice concerns, and engage with staff in a meaningful way. Additionally, project working groups during the plan development phase can be helpful to review documents and presentations to stakeholder groups can educate and solicit feedback. Spanish translators or bilingual staff will be available at these events to ensure accessibility for community members.

9. Surveys

Surveys serve as an essential tool for gathering feedback from a wide range of stakeholders regarding major ACE changes. Surveys can be conducted in-person, in print, or online. All surveys will include appropriate translation

provisions. Participants will be recruited by interest, subject matter, industry, position and demographics. Recruitment methods may include outreach through the ACE website, social media posts and ads, flyers, posters and incentives to encourage participation.

Table 2. Public Participation Plan Outreach Strategies.

Recommended Strategies	Change Types (Minor/Major)	LEP Considerations	Notes
ACE Rail Mobile App	Minor/Major	Spanish translation available through app	Post notices and announcements
Social Media	Minor/Major	Post in both English and Spanish	Post notices on Facebook, Instagram, and X
Media Relations	Minor/Major	Offer information to Spanish media outlets as needed	Includes press release and staff interviews
Customer Service Phone Number	Minor/Major	Offer Spanish translation	Provide info to staff regarding change
ACE Website	Minor/Major	Google translation feature available	Post notices and announcements on website
On-Board/Station Information Resources	Minor/Major	Translate materials to Spanish	Printed signage, flyers, and audio messaging
Community Engagement Events	Major Only	Have Spanish translator or staff available	Includes stakeholder groups and community organizations
Surveys	Major Only	Translate survey to Spanish	Gather feedback on major recommendations

Public Comment Process

SJRRC provides opportunities for public input regarding projects, studies, fare changes, major service changes, amendment of the disparate impact policy or disproportionate burden policy, and major service change policies by conducting public hearings or informational meetings as appropriate.

Meeting Locations and Logistics

When SJRRC policy requires or staff determine that a public meeting or a public hearing is necessary and appropriate, the Rail Commission will determine the geographical areas in which meetings will be held in light of information developed in the LEP Language Access Plan and in the mapping and demographic research conducted in support of that effort, as well as in an effort to ensure that other traditionally underserved populations are included. SJRRC will also identify and contact Community Based Organizations (CBOs) located in the relevant areas to determine their interest in assisting SJRRC with reaching out to their clients and residents of the selected areas.

San Joaquin Regional Rail Commission will reach out to a broad range of community interests, which may include civic groups; business organizations; service providers for youth, families and persons with disabilities; schools, including those providing English as a Second Language programs; churches and faith-based organizations; senior centers; and community centers.

Notification Methods

Community members shall be notified of opportunities to participate in meetings or otherwise share their opinions and ideas with SJRRC using an appropriate combination of public participation tools and strategies.

Translation Services

Translated materials and interpretation services will be available upon request or when SJRRC staff determines necessary using current federal and state regulations and guidance. In response to community or individual requests for additional languages, additional translated materials and interpretation services shall also be provided.

Public Hearing

When SJRRC policy, or SJRRC staff, following federal or state guidance, determines that a formal public hearing is to be held, the public hearing will consist of the following:

1. An information period will be provided to allow the SJRRC project team to explain the nature of the changes in service, detailing the reasoning behind the proposal to the public;
2. A public comment period will be provided to allow members of the public an opportunity to express their views on the topic at the hearing. SJRRC may either set limits on the length of time each person can speak to ensure all parties have ample time to share their view or, when the number of participants allows, conduct individual interviews with members of the public who wish to express their views. If the latter option is exercised, notes of the comments of the participants will be included in the transcript of the meeting;

3. Written comments regarding the service and/or fare changes being proposed will be considered;
4. SJRRC staff will be available at all public hearings to record comments from members of the public who prefer to provide their direct comment orally but not necessarily before a group; and
5. Public hearings will be of public record and open to all members of the public.

Public Hearing Information Dissemination and Public Notification

SJRRC will provide a written and oral explanation of the proposed changes to SJRRC policy, operational practice or other activities. The proposed changes will be available for public review and comment during the 30-day public comment period at the SJRRC offices or designated location. Public notice of the public hearing will be circulated to the area's media outlets within 30 days, and no less than five days prior to the actual hearing date; and must include the correct date, time location, and purpose of the hearing.

Use of Public Comments

SJRRC staff will take the views expressed by the citizens during the public hearing and 30-day comment period into consideration and make final recommendations to the SJRRC Board of Directors for a proper discussion and vote on the proposed changes or policies. Additional hearings may be arranged as appropriate. All comments received during the designated 30-day comment period will be considered when staff prepare their final recommendations and when the Board of Directors makes its decision.

Sample Public Participation Outreach Plan Timeline

1. SJRRC staff determines a public outreach effort is necessary and creates a public involvement plan for the project.
2. SJRRC reaches out to the community, particularly to Title VI, LEP, minority, and low- income Community Based Organizations, to identify places, times and locations for in- person and public meetings. The public involvement plan is modified, if necessary, to accommodate the needs and recommendations of the community.
3. The thirty-day formal comment period is held. Informal public meetings and/or public meetings are held, as determined in the public involvement plan.
4. Fifteen (15) days prior to the date of the public hearing, advertisements are placed, and announcements are made in the regional news media, on the ACE website and using other methods as appropriate.
5. No fewer than seven days before the SJRRC Board of Directors is scheduled to consider the issues under review, a summary report of the public comment, appended with copies and transcripts of the submitted public comment, will be

provided to the members of the SJRRC Board of Directors for review and consideration.

Performance Measure and Objectives

Public Participation Outcomes

San Joaquin Regional Rail Commission will work to provide the public and specific interested parties with the information and perspective necessary to provide thoughtful and considered comments that will assist SJRRC in setting policies and procedures that will ensure that it delivers high quality services to its customers and constituents.

SJRRC will evaluate and report on its efforts to provide opportunities to the public to participate in its decision-making processes, keep logs of contact with the public, particularly protected communities, and on the content and amount of the public comment received. Additionally, SJRRC will examine the results of its efforts, compare efforts with best practices, and modify future efforts to better reflect the desires of and enhance the ability of the public to participate in the decision-making process.

Summary of Outreach Efforts

SJRRC is committed to a thorough and robust public participation process that employs best practices; respects and follows federal and state law, regulation, and guidance on public participation; utilizes state resources effectively; and results in a belief in the communities it serves and more broadly that SJRRC values the input of the community in its decision-making process. The Commission's Public Participation Plan is intended to be a living document that will be informed by best practices, successes, and lessons learned.

Appendix D: Board Minutes

Minutes of Board Meeting where Title VI Program was approved will be attached here.