



**ORANGE COUNTY  
DEPARTMENT OF PLANNING  
TITLE VI  
SUBMISSION TO THE  
FEDERAL TRANSIT  
ADMINISTRATION**



**June 2021**



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## Abbreviations

OCDP	Orange County Department of Planning
FTA	Federal Transit Administration
OCTC	Orange County Transportation Council
MPO	Metropolitan Planning Organization
TIP	Transportation Improvement Program
LEP	Limited English Proficiency
USDOT	United States Department of Transportation
CE	Categorical Exclusion
ADA	Americans with Disability Act
RCRO	Regional Civil Rights Officer
NYSDOT	New York State Department of Transportation
FY	Fiscal Year
PPP	Public Participation Plan

## Orange County Department of Planning Title VI Submission to the Federal Transit Administration

The following documentation is submitted by the Orange County Department of Planning (OCDP) to fulfill reporting requirements outlined in FTA Circular – 4702.1B. The information provided follows the requirements and guidelines for reporting as set forth in the program circular.

### Title VI Assurances

OCDP will submit its Title VI Certification and Assurances via TrAMS at the beginning of the Federal Fiscal Year when the announcement is made in the Federal Register. The County also ensures that it does not pass on any Federal Transit Administration (FTA) funding to its sub-recipients until its sub-recipients acknowledge compliance with such guidelines.

### Title VI Complaint Procedures

#### General Overview

49 C.F.R. Part 21.1, 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 otherwise subjected to discrimination under any program or activity receiving Federal financial assistance from the Department of Transportation.”

In order to comply with Title VI and all of the regulations of 49 C.F.R. Part 21, Orange County, acting by and through its Planning Department provides the following complaint procedures for those persons who believe that they have been subjected to discrimination under any program or activity receiving Federal financial assistance from the United States Department of Transportation (USDOT). These procedures do not deny the right of the complainant to file a formal complaint with other State or Federal agencies or to seek private counsel for complaints alleging discrimination.

Planning and administrative activities are performed by OCDP and its contracted transit service providers. OCDP is controlled by a County Executive and County Legislature, which are elected positions. There are no transit advisory bodies in Orange County for which it would be possible to report minority representation. The Orange County Transportation Council (OCTC), the County’s Metropolitan Planning Organization (MPO), which is involved in local transit planning activities and the programming of FTA funds on the Transportation Improvement Program (TIP), is comprised of elected officials and ex officio representatives from state or regional transportation and transit agencies (the latter category – ex officio – being representatives to the MPO by virtue of the job for which they’ve been hired by the respective state or regional agencies).

Orange County requires its contracted federally-funded transit providers to comply with all FTA and New York State policies and regulations. Compliance with FTA policies and regulations is required through an operator agreement which is renewed every five years, and a requirement to update all certifications and assurances annually. If revisions to operator contract language were warranted due to changes in

FTA regulations, Orange County would require the operator contract to be updated prior to the end of the three-year term. Overall operator compliance is achieved through the County's extensive operator oversight program administered by OCDP.

**Who do these Title VI procedures apply to?**

Title VI applies to any program for which Federal financial assistance is authorized under a law administered by the USDOT. Federal financial assistance includes: grants and Federal loans; the grant or donation of Federal property and interests in property; the detail of Federal personnel; the sale and lease of and the permission to use Federal property or any interest in such property without consideration, or at a nominal consideration, or in recognition of the public interest to be served by such sale or lease to the recipient; any Federal agreement, arrangement or other contract which has as one of its purposes the provision of assistance.

**Who may file a Title VI complaint?**

A complaint may be filed by any person who believes himself, herself, or any specific class of persons to be subjected to discrimination.

**What is discrimination under Title VI?**

Discrimination under Title VI of the Civil Rights Act of 1964, as amended, is an act (action or inaction), whether intentional or unintentional, through which a person, solely because of race, color, national origin, creed, sex, age or disability, has been otherwise subjected to unequal treatment or impact under any program or activity receiving Federal financial assistance from the USDOT.

**How and where is a discrimination complaint filed?**

A complaint must be in writing, signed by the person(s) or their representative(s) and must include the complainant(s) name, address and telephone number. Attached is a Discrimination Complaint Form that may be used; however, a complaint may also be filed by sending the complaint via facsimile or electronic mail.

A signed written complaint must be filed within 180 days of the date of the alleged discrimination. The signed complaint must be sent to:

**Commissioner  
Orange County Department of Planning  
124 Main Street  
Goshen, NY 10924**

*How long will it take for my complaint to be resolved?*

The complaint will be reviewed by the Transit Coordinator of OCDP. When practicable, the complainant shall be notified, in writing, of the findings and remedial action, if any, within a period not to exceed 60 days.

Enclosed are **Attachment A** – Complaint Form, and **Attachment B1** – Sample Complaint Tracking Form and **Attachment B2** – Flowchart of the Complaint Intake, Monitoring, and Resolution process.

*Title VI Investigations, Complaints, and Lawsuits*

There have been **no** investigations, complaints, or lawsuits filed with or against the Orange County Department of Planning for Title VI violations during the past three (3) years.

*Limited English Proficiency (LEP) Plan*

OCDP has developed a LEP Plan (attached as **Attachment C**) designed to provide LEP populations meaningful access to transportation services, programs, and activities within Orange County. The document has been prepared to conform to the LEP requirements identified in the document titled, "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons – A Handbook for Public Transportation Providers," which was released by the FTA Office of Civil Rights on April 13, 2007.

*Notification to Beneficiaries of Protection Under Title VI*

OCDP recognizes the importance of informing the public of its Title VI rights and providing and distributing general information to the public in a manner and language that citizens can understand. OCDP and its sub-recipients periodically post the following statement through various media outlets, including the Department's website ([www.transitorange.info](http://www.transitorange.info), which has the ability to be translated, for example through free online services like Google Translate), flyers, and postings on buses and in main transportation facilities, to notify the public of their rights under Title VI. The figure provided on the following page is the official notification posted to notify individuals of their Title VI rights.

Orange County provides Title VI notices as per the "Safe Harbor" guidance, which states that language or translation assistance should be provided for each eligible language group that constitutes at least five (5) percent or 1,000 LEP individuals, whichever is less. Based on the demographic data analysis, Spanish and Yiddish LEP populations meet this threshold, and notification of Title VI protection is provided in Spanish and Yiddish (where necessary or as requested) in transit administration buildings and on-board transit vehicles. Additionally, if requested, Orange County will provide language assistance and will inform beneficiaries of their rights upon request.

**ORANGE COUNTY  
DEPARTMENT OF PLANNING  
TITLE VI POLICY STATEMENT**

Orange County Department of Planning (OCDP) assures that no person shall on the grounds of race, color, sex, age, disability or national origin, as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100.259) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity. OCDP further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not. In the event that OCDP distributes federal aid funds to another entity, it will include Title VI language in all written agreements and will monitor for compliance.

Additional Information:

Individuals and/or organizations who would like more information concerning OCDP's non-discrimination obligations should contact:

**Commissioner  
Orange County Department of Planning  
124 Main Street  
Goshen, NY 10924**

If information is needed in another language, please contact Transit Orange at [TransitOrange@orangecountygov.com](mailto:TransitOrange@orangecountygov.com) or call (845) 615-3850.

Complaint Procedures:

Individuals or organizations who believe they have been denied the benefits of, excluded from participation in, or subject to discrimination on the grounds of race, color, or national origin can file an administrative complaint with the OCDP under Title VI of the Civil Rights Act of 1964 and send to the above address. If desired, individuals and organizations may file a complaint by completing the attached Title VI complaint form or a copy of the form is available on-line at <http://www.transitorange.info>. Complaints should be signed and include contact information.

In addition to notifying citizens of their rights, OCDP has examined the language needs specific to its ridership within its LEP Plan and produces public materials to meet the identified language needs of its riders. OCDP is currently working with transit operators in distributing service schedules, maps, brochures, and other transit information in English and in other languages in targeted areas identified through the LEP Plan. All planning activities and notices which are advertised to the press are shared with news sources that serve a variety of Orange County's LEP communities. Such publications include official newspapers like Orange County Post, Straus Newspapers, Warwick Valley Dispatch, News of the Highlands, Der Blatt, Time Community Newspapers, and Hudson Valley Press. County legislative branch also publishes notices in the Times Herald Record, though it is not an official newspaper.

### **Information Request**

OCDP and its sub-recipients will provide additional information, in writing, upon request by the FTA when investigating complaints of discrimination or to resolve concerns about possible noncompliance with Title VI.

### **Sub-recipient Assurances and Monitoring**

OCDP collaborates with its sub-recipients in the development and administration of their Title VI programs, and monitors sub-recipient program adherence since OCDP is the primary recipient of FTA funds. OCDP, as a primary recipient, collects Title VI assurances from its sub-recipients prior to passing through FTA funds. In order to reduce the administrative burden associated with this requirement, OCDP's subrecipients have chosen to adopt the Title VI Notice developed by OCDP along with its Title VI complaint investigation and tracking procedures and complaint form. OCDP also requires its subrecipients to develop and make available a list of complaints, investigations, or lawsuits as part of the Operator Oversight Program.

OCDP provides assistance to its subrecipients as necessary and appropriate in advancing their efforts towards complying with FTA's Title VI regulations. OCDP provides the following information to its subrecipients including regulatory information, complaint filing and tracking forms, and has policy guidance and data made available for all subrecipients:

- OCDP provides notices to the public informing beneficiaries of their rights under DOT's Title VI regulations, procedures on how to file a Title VI complaint, and its Title VI complaint form to its sub-recipients.
- Sub-recipients have adopted OCDP's procedures for tracking and investigating Title VI complaints filed with any of the subrecipients
- OCDP has made available demographic information on the race and English proficiency of residents served by the subrecipients. This information will assist the sub-recipient in assessing the level and quality of service it provides to communities within its service area and in assessing the need for language assistance.

- OCDP has also made available any other OCDP-generated or obtained data, such as travel patterns, surveys, etc., that will assist subrecipients in complying with Title VI regulations.

OCDP ensures that its subrecipients are in compliance with Title VI requirements, by ensuring the following:

- Collecting Title VI Programs from subrecipients and reviewing their programs for compliance.
- Periodic verification of complaint log and operator data via operator oversight program.

### **Environmental Justice – Construction Projects**

There have been no construction projects within Orange County over the last three years that required conducting an environmental impact analysis.

### **Equity Analysis to Determine Site or Location of Facilities**

Orange County does not own or operate any transit facilities. The County did not experience a major fare increase or service reduction since the last Title VI submission (beyond temporary reductions due to the COVID-19 pandemic) that requires a formal equity analysis and submission to FTA.

### **Inclusive Public Participation and Engagement**

OCDP recognizes the importance of engaging members of the public, particularly those who depend upon public transit services, in planning activities and marketing efforts that reach and inform all current and/or potential transit customers through various strategies and outlets. OCDP understands that it is particularly important to make special efforts to reach out to and engage members of disadvantaged segments of the community such as lower income, minority, and LEP populations. This is currently achieved through a variety of measures, as described below, and is continuously being updated and enhanced.

### **Organizational Structure**

The structure for engaging with the public is generally two-fold within Orange County: Transit operators directly interact with riders, while OCDP serves as the designated coordinating agency and is tasked with planning and implementation. Additionally, OCDP works extensively with the OCTC, the MPO of Orange County, to provide public notice and participation opportunities to all members of the community.

As it relates to public outreach and participation, transit operators are tasked with day-to-day operations. They are typically the first interaction as it relates to Title VI complaints and language assistance needs, and are pivotal in tracking such interactions.

OCDP, which performs planning and administrative activities, collaborates with transit operators via the operator oversight program. This program allows OCDP to coordinate with operators regarding complaints, language assistance, and day-to-day operations, and formally track these interactions.

OCDP uses the information discussed within operator oversight meetings to inform the overarching planning process and guide the potential outreach initiatives.

### Language Assistance and Translations Services

OCDP utilizes a third-party translator service for individuals in need of language assistance, as well as the services of voluntary translators from across different departments within the County administration, who are fluent in a number of languages. **Attachment D** provides a flowchart overview of how language assistance requests are handled.

### Operator Outreach Program

OCDP staff meet with transit operators on a regular basis. As part of each operators' annual review, Orange County staff review the current Title VI Plan, each operator's LEP obligation, and discuss how each operator is pro-actively reaching out to minority, low-income, and LEP populations residing within their service areas to increase transit awareness and grow ridership.

Due to the decentralized nature of transit services among the fifteen different transit operators in the County, transit operators have a good understanding of the local community requirements in distributing transit service information. However, the County has an overall understanding of its community needs and the linkages between different communities. The operator oversight program provides the opportunity for collaboration between these two branches, allowing for more effective planning, facilitation, and implementation of public transportation initiatives.

### Meetings and Workshops

Opportunities for public participation are provided through public workshops and presentations; where participants are invited to share comments and/or submit written comment to OCDP staff. General public sessions occur through OCTC meetings (now including the newly established Transit Subcommittee); however, most workshops have occurred by request and/or through targeted outreach programming at specific transit markets, such as human services organizations or groups.

OCDP staff have presented at a number of community workshops to discuss transit alternatives in Orange County and their use. Over the last several years, these workshops have been targeted at human service organizations or groups in order to raise awareness and promote transit usage. This program received a warm response from case managers who stated that the program was a valuable and cost-effective tool to helping transit-dependent residents overcome their fears of taking the bus. The County also actively coordinates with the newly formed Coordination Council, which is made of up transit planners, human service agencies, transportation coordinators, transit operators, and county residents.

Additionally, offices providing social services, such as the Department of Health and the Department of Social Services frequently interact with low-income individuals and families. Those offices have been provided with transit maps that highlight locations relevant to the services offered, such as clinic locations and the bus routes used to reach them.

Surveys

In Fiscal Year (FY) 2017, Orange County administered an on-board transit survey to identify current, short-term, and long-term transit needs. As part of this effort, oversampling occurred within transit-dense communities in which minority low-income, and LEP populations have been identified. Surveying efforts were conducted with LEP language considerations. As a result of this survey, OCDP has implemented several initiatives to improve access to transit based on feedback received from riders. Ongoing efforts include a full overhaul of the Transit Orange website to improve ease of access (including integration of an online trip planner), identification of opportunities to deploy CAD AVL software, and exploration of new ridership markets and non-traditional transit alternatives to bolster transit access to and from major employers throughout the county.

A subsequent on-board survey will be performed in FY 2022 that will more broadly cover the County’s fixed-route and demand responsive services. As part of this update, more expansive survey options will be considered to help understand the overarching mobility needs, including those not currently served by traditional transit services.

Coordination with Community Organizations

OCDP contacts local synagogues and other houses of worship prior to undertaking a data collection or public outreach session to ensure that OCDP’s activities do not interfere with religious holidays or observances. Furthermore, OCDP staff reach out directly to identified LEP communities to inform them of their rights under Title VI. The following table details some of the community groups and publications engaged through an inclusive public participation strategy.

**Table 1: Community Organizations & Publications Engaged Through Inclusive Public Participation Strategy**

Language	Organization
Spanish	El Sol de New York
	Catholic Charities Community Services of Orange County, NY
	The Farmworkers Community Center (The Alamo)
	Latinos Unidos of the Hudson Valley
Hebrew	Jewish Federation of Greater Orange County
	Newburgh Jewish Community Center
	Hamaspik Gazette
	Der Blatt
	Der Yid
Chinese	Orange County Chinese Christian Church

Additionally, as part of a continued operator outreach, the County maintains consistent communication with local partners, and thereby in turn with the transit riders by way of engaging community organizations and the business community to understand the needs of the LEP population. For example, transit operators regularly communicate with leaders of community organizations and managers of businesses frequented by LEP populations to understand how they may be able to improve accessibility to services and/or improve services to meet community needs more effectively.

### Coordination with OCTC

While OCDP utilizes the above public participation and engagement strategies, OCDP also coordinates with the OCTC, the region's MPO. OCTC is currently undergoing an update to their Public Participation Plan (PPP). The draft PPP is provided in **Attachment E**.

The PPP provides a framework for OCTC to include stakeholders in the decision-making process for future and ongoing projects, plans, and activities that help maintain and improve transportation in Orange County. Where possible, OCDP will leverage the strategies outlined in the PPP for transit-related planning and programming efforts in which OCTC acts as the lead agency. Additionally, OCDP follows the following procedures as it relates to OCTC meetings, which are open to the public and cover all aspects of transportation planning processes including public transportation services:

1. All OCTC Planning and Policy Committee meetings follow New York State Open Meetings Law and will include a hybrid approach for in-person and virtual participation. The virtual option may include access via a virtual meeting platform and/or a call-in option.
2. The MPO Public Information mailing list will be maintained by OCDP and updated regularly by OCTC staff agencies. The OCTC Staff will continue its efforts to identify and include citizens and groups that are traditionally under served by the transportation system.
3. Any person or agency requesting information or expressing an interest in receiving announcements will automatically be added to the list. The individuals and groups on the mailing list will be periodically surveyed to determine their continued interest in OCTC and its activities.
4. OCTC staff will notify the mailing list and the area media outlets about any public involvement activity 14 calendar days prior to the event. The notice will include the date, time, location, and purpose or topic of the meeting. A public comment period will extend for an additional 7 calendar days after the public involvement activity.
5. A synopsis of the written or verbal comments resulting from this notification, and the proposed responses will be prepared by OCDP and will be available upon request.
6. Documentation and synopses of all public OCTC staff meetings will be prepared and retained by OCDP. Copies will be available upon request.
7. Technical and policy information and data will be available from the two OCTC Staff agencies, OCDP and NYSDOT - Region 8. Data requests of significant size will be made available within a reasonable period of time.
8. Transportation Providers such as Rail-Passenger/Freight, Taxi, Fleets-School Bus/Ambulances, Interstate Bus, Fixed Bus, Dial-A-Ride, Auto Industry, Airplane-Passenger/Freight, and Truckers-Freight will be invited and will be part of the OCTC Planning Committee.

9. All persons attending an OCTC Policy Committee meeting, including OCTC members and the general public, will be asked to record their name, address, and the interest or group they represent.
10. The general public will be given the opportunity to speak at each OCTC Policy Committee meeting under the public participation section of the agenda on any item pertinent to the agenda or the transportation planning process. This does not preclude the general public from commenting on any agenda item as it is being discussed, time permitting.
11. The Chairperson shall be the official spokesperson for the Council to inform the public of the work of the transportation planning program, and to maintain good relations with the press and media. Upon request, any Council Member can make a public statement or issue a press release on behalf of their organization. Any public statement issued on behalf of OCTC must receive prior approval by the Council.

A list of public meetings that occurred over the last three years for OCTC and OCDP is provided in Table 2. Detailed information and meeting minutes for the two committees that make up OCTC, the Policy Committee and Planning Committee are available at:

<https://www.orangecountygov.com/1816/Meeting-Agendas-Summaries>

Table 2: 2018 – 2021 Orange County Transportation Council Public Participation Program

Planning Committee Meetings	Policy Committee Meetings	Transit Subcommittee Meetings	Coordination Council Meetings
8/21/2018	9/12/2018	1/31/2019	7/18/2019
10/16/2018	11/13/2018	5/9/2019	9/19/2019
12/18/2018	2/21/2019	8/6/2019	10/17/2019
1/15/2019	6/18/2019	12/12/2019	2/27/2020
3/19/2019	8/20/2019	1/14/2021	
4/16/2019	9/26/2019	5/5/2021	
5/21/2019	11/26/2019		
6/18/2019	2/25/2020		
7/9/2019	6/9/2020		
9/26/2019	9/8/2020		
10/17/2019	11/10/2020		
1/21/2020	3/2/2021		
5/12/2020	6/8/2021		
6/9/2020			
8/11/2020			
10/21/2020			
12/8/2020			
1/25/2021			
4/13/2021			
5/11/2021			
6/8/2021			

**Demographic Data**

All demographic data presented was obtained from the 2015-2019 American Community Survey and serve as the base data for requested maps and charts.

Orange County has a total population of 380,085; of which 41,779 identified themselves as Black (11.0%), 77,882 identified themselves as Hispanic (20.5%), 10,280 identified themselves as Asian (2.7%), and 1,482 identified themselves as American Indian (0.4%) persons. Between 2016 and 2019, minority population grew at a rate of 6.5% compared to that of the total population of 1.0% growth.

Median family income for Black, Hispanic, and American Indian populations was lower for the entire population, but, for Asian population, the family income was higher. All minority population groups had higher unemployment rates than the county overall. The percentage of Black and Hispanic populations who use public transportation as the primary means of travel to and from work was greater (Black 7.1% and Hispanic 5.3%) as compared to the percentage of the total population (5.1%). Orange County has focused on increasing services in areas with high concentrations of minority population to provide transit services to these customers whose exclusive means of travel to work is public transit. All of these characteristics suggest a minority population with more limited transportation choices and more dependence on public transportation. There are 35 census tracts with higher concentrations of minority population than the County average. A summary of Orange County tracts with higher concentrations of minority population is provided in Table 3.

**Table 3: Orange County Tracts with Higher Concentrations of Minority Population**

Census Tract	2019 Population	Minority Population	Minority Population as a Percentage of Total Population
Census Tract 1	3,437	1,446	42.1%
Census Tract 2	2,974	1,524	51.2%
Census Tract 3	6,903	4,694	67.0%
Census Tract 4	4,392	2,976	67.8%
Census Tract 5.01	2,842	1,503	52.9%
Census Tract 5.02	3,763	2,353	62.5%
Census Tract 6	4,022	2,165	53.8%
Census Tract 11	4,242	1,794	42.3%
Census Tract 12	2,251	1,454	64.6%
Census Tract 13	3,255	935	28.7%
Census Tract 15	4,537	2,205	48.6%
Census Tract 16	7,377	3,675	49.8%
Census Tract 21	3,437	926	26.9%
Census Tract 101.02	5,520	1,514	27.4%
Census Tract 102	5,104	1,340	26.3%
Census Tract 104	3,795	1,144	30.1%
Census Tract 105	8,112	3,172	39.1%
Census Tract 111.01	2,608	1,242	47.6%
Census Tract 111.02	4,217	1,897	45.0%
Census Tract 112	4,122	1,439	34.9%
Census Tract 113	8,383	4,874	58.1%
Census Tract 115	6,731	1,798	26.7%

Census Tract 118.01	4,642	1,209	26.0%
Census Tract 121	3,755	1,146	30.5%
Census Tract 126.01	4,503	1,955	43.4%
Census Tract 126.02	3,031	1,200	39.6%
Census Tract 132.02	2,217	630	28.4%
Census Tract 134	3,293	861	26.1%
Census Tract 137	2,614	1,093	41.8%
Census Tract 138	3,168	848	26.8%
Census Tract 141.01	4,405	1,881	42.7%
Census Tract 141.02	5,945	2,892	48.6%
Census Tract 143.01	5,006	1,623	32.4%
Census Tract 151	6,568	3,694	56.2%
Census Tract 152	10,722	2,810	26.2%
<b>Orange County</b>	<b>380,085</b>	<b>97,402</b>	<b>25.6%</b>

Attached to this report (**Attachment F-1** through **F-5**) are the demographic and service profile maps to fulfill the requirement outlined in Chapter 5 of FTA C 4702.1B.

**Systemwide Service Standards and Policies**

There are fifteen bus transit operators sponsored by Orange County providing service in four general categories: Commuter Bus, Local Bus (Fixed Route), Dial-A-Ride, and Paratransit services. The fifteen transit providers are Coach USA/Shortline (Hudson Transit), Monroe Bus Lines, Monsey Trails, and NJ Transit operating the commuter bus service; Fixed route local bus services are operated by Hudson Transit Lines Inc., Newburgh-Beacon Bus Corporation, and the Village of Kiryas Joel; Dial-A-Ride service is provided by the Towns of Goshen and Chester, Town of Highlands, Town of Monroe, Towns of Montgomery and Crawford, Town of Newburgh, City of Port Jervis, Village of Kiryas Joel, Town of Wallkill, and the Town of Warwick; Paratransit services are provided by Orange County through its contractor MTM Transit, LLC.

Service standards are collected quarterly or when a major service change occurs by analyzing data received from bus operators within the County. The data includes the results of the following transit service indicators: vehicle loads, vehicle assignments, vehicle headways, distribution of transit amenities and transit access.

OCDP defines a “major service change” as any service change that qualifies for a public meeting. The following parameters are used to warrant what constitutes a major service change:

1. Change in Revenue Miles – any change that results in 25% variation in revenue miles along a selected route;

2. Change in Route Miles – changes to routes which include addition or removal or 20% of route miles or modification to existing route alignments which constitute 20% of total route miles.
3. Affected Ridership (by route) – if 25% or more of the existing ridership may be affected due to the purported service change.
4. Inclusion or removal of a complete route service – if a new route is being introduced or an existing route is being abandoned, it qualifies as a major service change.

Apart from the above thresholds that have been identified by the County as a major service change, the County also works with the operators to identify the need for public meetings on an “as-needed” basis. For example, cases where there are issues of local importance involved, or variations to schedules and operating hours, are considered significant enough to warrant such public meetings.

### **Vehicle Load**

It is the County’s policy that transit operators collect, analyze and report vehicle load factors on a quarterly basis and submit them as part of their quarterly reporting process.

Orange County’s vehicle load service standards stipulate that the service providers (fixed route and commuter services) maintain a minimum load factor 0.15 and a maximum load factor 0.90. If quarterly reports indicate that the load factors are not within the designated range, Orange County planning staff will work with operators in examining current operations, identify trends, and develop alternative routing and/or service frequencies that bring service standards within compliance as needed.

On average, vehicle load profile data indicates load factors range from 0.17 to 0.49. Load factors on paratransit and Dial-A-Ride services should be considered on a different scale than fixed route transit on the basis of availability of service. Dial-A-Ride and paratransit vehicles consist of anywhere between 6 and 28 seats per vehicle and the load factor for any given run depends on the number of passengers making the reservation, and pick-ups along the route, which differentiates it from the load factors on fixed route transit and is a good indicator of level of service and capacity. Based on ridership data collected in 2019, no system-wide capacity constraints for the Dial-A-Ride and paratransit systems were identified, with operators observing between 11 and 109 passengers per day on average. The following table reports on the findings for the vehicle load analysis for OCDP’s operators\*.

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\* Vehicle load profiles are based on 2019 ridership data as 2020 data would not represent typical conditions given the ongoing Covid-19 pandemic.

Table 4: Vehicle Load Profile

Fixed Route Service	Annual Number of Published Runs	Vehicle Capacity	Annual Number of Seats	Average Annual Number of Passengers	Load Factor
Middletown	10,400	28	291,200	53,739	19%
Newburgh	22,700	32	726,400	124,111	17%
Kiryas Joel	11,500	28	322,000	128,756	40%
Coach USA	61,690	54	3,331,260	1,643,613	49%

**Vehicle Assignment**

Orange County adheres to a uniform vehicle size and fleet age turnover policy, which ensures a homogenous age profile across operators and routes. Orange County’s fleet is uniform in age, size, and amenity within each operator. Nevertheless, it is Orange County’s policy that contracted operators rotate fleet vehicles daily to ensure equitable distribution across all services. As such, LEP, minority, and/or transportation-disadvantaged routes are being serviced uniformly to non-LEP, minority, and/or transportation-disadvantaged routes.

Information regarding vehicle assignment is reviewed on-site during operator oversight meetings. If a pattern of inadequate rotation of vehicles is identified, Orange County planning staff will address this with the operator during the annual oversight review.

Orange County follows the FTA’s definition of minority transit routes and designates any route that has at least 1/3 of its total revenue mileage in a Census tract with a percentage of minority population that exceeds the percentage of minority population in the transit service area. Given the high incidence of minority population in the local transit service areas, it can be seen that all local fixed route transit routes within Orange County are designated as minority routes.

This vehicle assignment report was obtained from the vehicle assignment records of each operator. Supporting service indicator documentation for vehicle assignments for operators can be found in the following table.

Table 5 – Vehicle Assignment Records

Kiryas Joel Vehicles	Minority Status	Routes Serviced	Age	Amenities
21	✓	Local, Town, Woodbury	8	AC, W/C
22	✓	Local, Town, Woodbury	8	AC, W/C
23	✓	Local, Town, Woodbury	8	AC, W/C
24	✓	Local, Town, Woodbury	8	AC, W/C
25	✓	Local, Town, Woodbury	8	AC, W/C
26	✓	Local, Town, Woodbury	8	AC, W/C

Middletown Vehicles	Minority Status	Routes Serviced	Age	Amenities
901	✓	1, 2, 3, 4	8	AC, W/C
902	✓	1, 2, 3, 4	8	AC, W/C
903	✓	1, 2, 3, 4	8	AC, W/C

Newburgh Vehicles	Minority Status	Routes Serviced	Age	Amenities
211	✓	Crosstown, Northside, Southside, Broadway	14	AC, W/C
215	✓	Crosstown, Northside, Southside, Broadway	14	AC, W/C
217	✓	Crosstown, Northside, Southside, Broadway	8	AC, W/C
219	✓	Crosstown, Northside, Southside, Broadway	8	AC, W/C
221	✓	Crosstown, Northside, Southside, Broadway	8	AC, W/C
223	✓	Crosstown, Northside, Southside, Broadway	8	AC, W/C
225	✓	Crosstown, Northside, Southside, Broadway	8	AC, W/C
227	✓	Crosstown, Northside, Southside, Broadway	8	AC, W/C

Coach USA Vehicles	Minority Status	Routes Serviced	Age <sup>†</sup>	Amenities
-		Long Island Service	14.3	AC, Lav, W/C
-		Binghamton – NYC – Long Island	14.3	AC, Lav, W/C
-	✓	Dutchess County - Newburgh	14.3	AC, Lav, W/C
-	✓	Orange County to/from NYC	14.3	AC, Lav, W/C
-	✓	Main Line	14.3	AC, Lav, W/C
-	✓	Orange County	14.3	AC, Lav, W/C
-	✓	Bear Mountain – West Point - NYC	14.3	AC, Lav, W/C
-		Eastside Manhattan Woodbury Common Service	14.3	AC, Lav, W/C
-	✓	Pennsylvania Points	14.3	AC, Lav, W/C
-		GWB / Eastside Manhattan Commuter	14.3	AC, Lav, W/C
-	✓	OWL	14.3	AC, Lav, W/C

<sup>†</sup> Coach USA Hudson Transit has a fleet of 26 vehicles servicing Orange County with an average age of 14.3 years old. A fleet manifest outlining the usage, model, age, and amenities of each vehicle is available.

**Vehicle Headways**

OCDP obtains vehicle headway information from individual operators and monitors any headway operating variances with the operators as part of their annual oversight process. The County also works with the service providers to assess vehicle headway remedial actions when vehicle load standards are not being consistently met. Any potential changes to vehicle headways will be considered for their adverse affects on LEP, low-income and minority populations. The following table shows system-wide service standards for maximum vehicle headways classified by type of service – commuter and local fixed route transit bus for peak and off-peak time periods. Orange County recognizes the existing operating peak headways of 30 to 90 minutes is sufficient until a significant ridership demand increase dictates a need for a reduction.

**Table 6: Vehicle Headway Service Standards**

Type of Service	Peak	Off-Peak
Commuter Bus	160 min.*	240 min.
Fixed Route Transit Bus	90 min.**	120 min.

\*Commuter Bus services servicing people from Orange County to NYC and beyond.

\*\* Local Bus services servicing people traveling within Orange County.

This information lists the headways for all of the various routes serving Orange County, by operator. The lowest headways of 30 minutes are provided on Newburgh’s Broadway Route and Middletown’s Route 2 on weekdays. Longer headways of 60 to 90 minutes are provided for the remainder of Newburgh and Middletown routes, in addition to routes within Kiryas Joel. Commuter bus routes run at higher headways of up to 160 minutes during peak periods and up to 240 minutes during off-peak periods. Supporting service indicator documentation for vehicle headways for operators can be found in the following table.

**Table 7: Vehicle Headways**

Operator/Route	Minority Status	Peak	Off-Peak
<b>Middletown</b>			
Route 1	✓	75 min.	75 min.
Route 2	✓	30 min.	75 min.
Route 3	✓	75 min.	75 min.
Route 4	✓	75 min.	75 min.
<b>Newburgh</b>			
Northside Route	✓	60 min.	60 min.
Southside Route	✓	60 min.	60 min.
Broadway Route	✓	30 min.	30 min.
Crosstown Route	✓	90 min.	90 min.
<b>Kiryas Joel</b>			
Local Route	✓	60 min.	60 min.
Woodbury Common Route	✓	60 min.	60 min.
Walmart Route	✓	60 min	60 min

### **Distribution of Transit Amenities**

Orange County transit amenities include, but are not limited to, ADA accessible bus stops, benches, shelters, schedules, and system maps. OCDP adopts a comprehensive, universal, and systematic approach in installation and distribution of transit amenities. First, Orange County purchases the same transit amenities regardless of where they will be located and who will be using them (i.e. – a standard bus or bus shelter design is used throughout the entire County). Secondly, amenities are distributed to operators and communities upon the end of their prescribed useful life. Lastly, stop locations are distributed evenly along routes based on service demand; with shelters being located at the greatest boarding/alighting locations, major landmarks, and major transfer points. Transit service provider input is considered when evaluating stops and amenities.

The County also evaluates site specific improvements and the impact of such improvements on LEP and minority populations and access to facilities and service information. For this, demographic data and needs of local community are considered for making an informed decision at a localized geographic level.

An accompanying Transit Base Map (see **Attachment F1**) identifies the location of transit offices and facilities, including Park & Ride lots. Park & Ride lots are identified because they are not only located at commuter bus terminal stations like Newburgh bus terminal, and along Coach USA/Shortline terminals in Middletown and Monroe, but also along commuter bus routes providing increased transit access to all populations.

### **Transit Access**

Bus transit services in Orange County are provided in four general categories: Commuter Bus Service, Local Bus (Fixed Route), Dial-A-Ride service and Paratransit Service.

Commuter bus service carries a majority of the County's transit riders providing service between Orange County and New York City. Local bus services are operated in the cities of Middletown, Newburgh, and Village of Kiryas Joel and their surrounding areas. These services can be used to make connections to commuter services and other places within the County. Local buses provide transit service along a fixed route with designated stop locations; however, they also operate by a "flag down" system, which allows a rider to access or exit the bus system at any safe location along the route.

Dial-A-Ride is a demand response municipal service providing curb-to-curb services that the riders can schedule by calling 24 hours in advance. Dial-A-Ride services provide transit access in some areas of Orange County that are not served by fixed routes. As a result, Dial-A-Ride systems fill two transit accessibility roles: (1) transit service in non-fixed route areas and (2) act as feeders into the fixed route system.

Paratransit services are provided in accordance with the Americans with Disability Act (ADA) in all areas with local bus services, provided the origin and destination of the trip are within  $\frac{3}{4}$ <sup>th</sup> of a mile from an existing fixed bus route.

**Service Availability**

Orange County defines service availability as a measure of the distribution of routes within a given transit provider’s service area. At the county level, all the transit service areas (fixed route, Dial-A-Ride, and complementary paratransit services) cover 78 percent of the total population of the County. To ensure the highest potential transit ridership and the greatest availability of services to Orange County residents, fixed transit routes and amenities are concentrated in high and medium density areas. Areas of low density are serviced by municipal Dial-A-Ride services where such services exist. As summarized in Table 6, bus transit services in the county cover 94 percent of high-density census tracts, 70 percent of medium density census tracts, and 55 percent of all low-density census tracts.

**Table 8: Service Availability by Population Density**

<b>Density</b>	<b>Service Availability</b>
High Density (> 1000 persons per square mile)	94%
Medium density (> 500 and <= 1000 persons per square mile)	70%
Low Density (< 500 persons per square mile)	55%

**Fares**

Commuter bus fares vary by the transit provider and the length of trip. For example, NJ Transit fares are based on zone structure, and transfers are allowed as long as the trip falls within a single zone. Fare information is available online or by paper schedules. Local fixed route bus services charge a regular fare of \$1.50 and offer half fares for seniors and disabled people. Complimentary ADA Paratransit services charge a fare of \$0.75 per trip. Typically, Dial-A-Ride operators charge \$1.00 for regular tickets and \$0.50 for seniors or disabled people but have different limits on the age of children who are allowed to ride free of cost when accompanied by a fare paying adult. Regular fares are higher for Towns of Goshen and Chester (\$4.00), Town of Monroe (\$2.00), Town of Wallkill (\$3.00), and Town of Warwick (\$2.00).

**On-Time Performance**

OCDP works with operators to perform periodic on-board performance monitoring and addresses issues as part of the operator oversight program. To ensure that on-time performance standards are universally tracked and upheld by transit operators, OCDP is implementing a more robust performance monitoring program through planned implementation of CAD AVL systems, which would utilize GPS technology to better track system performance in real time. OCDP will be defining a vehicle as being “on-time” if it arrives at defined locations five minutes before or five minutes after the scheduled arrival time. Buses arriving within this time frame are considered on-time.

**Transit Security**

OCDP maintains a complete roster of vehicles serving within Orange County. Information on this roster includes vehicle dimensions, passenger load, condition, mileage, as well as a unique “Operator Identification Number” for each vehicle. This number is also painted on the side and rear of the vehicle

and can be used to track and identify vehicles when in service. The transit vehicle rosters, both fixed route and Dial-A-Ride, can be found in Attachment **G1 and G2**.

Additionally, the following summarizes the current safety and security features utilized and paid for by each of the transit properties operating within Orange County:

- **Highlands Dial-A-Ride:** Buses are parked in a fenced in area at a secure municipal maintenance facility.
- **Monroe Dial-A-Ride:** Buses are parked in a fenced in area at a secure municipal building.
- **Newburgh Dial-A-Ride:** Buses parked at a secure municipal maintenance facility.
- **Wallkill Dial-A-Ride:** Buses are parked at a secure municipal building complex, which includes the Police Department, 24-hour video surveillance of the buses, as well as the maintenance facilities. Additionally, all in-service vehicles have on-board GPS technologies and tracking software.
- **Warwick Dial-A-Ride:** Buses are parked at a secure municipal complex, which houses the Police Department and the maintenance facilities.
- **Goshen-Chester Dial-A-Ride:** Buses are parked at a municipal complex, which houses the Police Department and the maintenance facilities.
- **Montgomery-Crawford Dial-A-Ride:** Buses are locked in the Town of Montgomery Highway Department garage when not in use. Cameras are installed at this location.
- **Middletown Area Transit:** Buses are parked inside a secure garage with a security system that is surrounded by a fenced and locked parking lot.
- **Newburgh Area Transit:** Buses are parked at a garage which is manned and operational 24 hours a day. Buses require a unique start up code specific to each driver be inputted to allow ignition.
- **Village of Kiryas Joel:** Buses are parked in a secure fenced parking lot.
- **Port Jervis Dial-A-Ride:** Buses are kept locked in the Department of Public Works lot when not operating.
- **MTM Transit, LLC:** Buses are parked in an area with video camera surveillance.
- **Coach USA:** Buses are parked at a garage which is manned and operational 24 hours a day. The buses have GPS technologies on-board and require a unique start up code specific to each driver be inputted to allow ignition.

### Service and Fare Changes

Pursuant to FTA regulations, the OCDP has established the following written procedures for public outreach when fare increases and/or major service reductions, as above (Systemwide Service Standards and Policies), are proposed by transit operators receiving federal assistance.

1. Transit providers are required to submit written documentation to the Orange County Planning Commissioner detailing the intent, reasoning, and potential impacts associated with a fare increase and/or major service reduction.
2. Upon receipt of this notification Orange County planning staff will conduct a service and fare equity analysis (following FTA's Fare and Service Equity Guidance documentation) to determine whether the proposed changes will have a discriminatory impact. The findings from the analysis will be sent to the Regional Civil Rights Officer (RCRO) and the soliciting transit provider.
  - a. If the requested changes are acceptable and/or non-discriminatory, Orange County Planning staff will submit a letter approving the requested changes and the transit operator can begin the formal public outreach process.
  - b. If the requested changes are found to be un-acceptable and/or discriminatory, Orange County Planning staff will submit a letter denying approval and recommend fare and/or service changes that are acceptable. The transit provider will then be required to begin the process again by re-submitting a letter of intent to Orange County Planning staff.
3. A public meeting shall be scheduled to occur no sooner than 30 days upon the receipt of an approval letter from Orange County Planning staff. The public meeting announcement will be published as a legal notice in:
  - a. One (1) of the "official county newspapers" (contact County Planning staff for a listing); and in addition
  - b. One (1) local newspaper with circulation in the area(s) being affected by the proposed fare increases and/or major service reductions.

All legal notices shall be posted at least 20 days prior to the public meeting date. Additionally, the operator should inform the public (to its best ability) through media coverage, sign postings on all buses, in municipal halls, libraries, key bus shelters and on its web site (if available).

4. The transit provider is responsible for making a presentation at the public meeting explaining the proposal and the reasoning behind the intended changes. Minutes of the meeting will be maintained and recorded, and statements from the public will be entered into a formal record and summarized.
5. All public meeting/comment materials and a memorandum outlining the proposed fare increases and/or major service reductions shall be submitted to the Orange County Planning Commissioner no more than 30 days after the public hearing is held.

6. Transit providers are required to notify NYSDOT, Passenger Transportation Division of the intended changes in writing no later than 14 days after submitting notice (Item Number 5) to the Orange County Planning Commissioner.
7. Transit providers are responsible for submitting a public announcement of the intended fare increases and/or major service reductions to local newspapers in the form of a press release. Public notification must be distributed and posted through the same outlets as the legal notice (Item Number 3). Fare increases and/or major service reductions shall not go into effect until at least 30 days have lapsed following the publication of the public announcement.

### **Disparate Impact Policy**

Orange County conducts an equity analysis whenever there is a proposal for fare change and/or a major service change. One objective of the analysis is to assess the effects of the proposed service and/or fare change and determine if the change would result in a disparate impact on the basis of race, color, or national origin. Service equity analyses are conducted to determine impact of changes on impacted population and specific target groups (low-income, minority and LEP populations).

When performing an equity analysis, Orange County must analyze how the proposed action would impact minority populations as compared to non-minority populations. In the event the proposed action has a negative impact that affects minorities more than non-minorities with a disparity that exceeds the adopted Disparate Impact Threshold, or that benefits non-minorities more than minorities with a disparity that exceeds the adopted Disparate Impact Threshold, Orange County must evaluate whether there is an alternative that has a more equitable impact. Otherwise, Orange County must take measures to mitigate the impact of the proposed action on the affected minority population and demonstrate that a legitimate business purpose cannot otherwise be accomplished and that the proposed change is the least discriminatory alternative.

Disparate impact/disproportionate burden thresholds are defined as being statistically significant in disparity and presented as a statistical percentage of impacts borne by minority populations compared to impacts borne by non-minority populations. These impact thresholds are applied uniformly. Orange County maintains the following Disparate Impact Thresholds:

- Major service change - the adverse impacts affecting minorities or the benefits to non-minorities of a major service change shall not exceed 20 percent based on the cumulative impact of the proposed major service changes.
- Proposed fare adjustment - the adverse impacts affecting minorities or the benefits to non-minorities of a fare change shall not exceed 10 percent based on the cumulative impact of the proposed fare changes.

### **Transit Service Monitoring**

OCDP's monitoring program examines how well Transit Orange services meet the needs of Orange County residents, specifically those of minorities, people of lower incomes and LEP persons, to ensure that equitable transit services are provided to all segments of the service area's population. In the spring

and summer of 2017, Orange County conducted a countywide on-board ridership survey to better understand travel behavior; examine patterns of service usage, fare media preference, and rider disposition towards transit; collect rider satisfaction data to inform short- and long-term service enhancements; and collect data to support long-range planning efforts. The survey was performed on board all bus routes funded by the Department, during different parts of the service schedule day (morning period, evening period, late night, for example) in order to collect a sample of data that represents various sub-populations of transit ridership. A subsequent on-board survey will be performed in FY 2022 that will more broadly cover the County's fixed-route and demand responsive services. As part of this update, more expansive survey options will be considered to help understand the overarching mobility needs, including those not currently served by traditional transit services.

In conjunction with the survey efforts, OCDP will observe how well the transit services meet the Department's standards and policies regarding equal and fair treatment for all users. In instances where abuses or inequities are observed, OCDP will develop a plan to address and correct those issues. For example, OCDP representatives conducting the monitoring program will look for service schedules, bulletins, legal notices and other information posted at transit stations and on-board buses to make sure they are available and visible in English and Spanish. Where those materials are not present, OCDP will take appropriate action to make them available for transit users.

In addition, Orange County's operator oversight program monitors the following service standards and policies as part of their operator oversight program. Site visits, and periodic reports from the operators are monitored to check for compliance with the system-wide and mode-specific standards. Orange County Board's approval to the Title VI plan signifies approval of this constituent service monitoring analysis.

**Table 9: Operator Oversight Program  
LEP and Transit Service Performance Standards**

<b>Service Parameter</b>	<b>Service Monitoring Standard</b>	<b>Monitoring Result</b>
Vehicle Load	Minimum load factor 0.15 and a maximum load factor 0.90	Meets standards.
Vehicle Headways	90 min. (peak) and 120 min. (off-peak) for local fixed route service 160 min (peak) and 240 min (off-peak) for commuter bus service	Meets standards for both commuter and local bus fixed route service.
Vehicle Assignment	Vehicles rotated daily. Average size of fleet is same for the fleet overall across operators.	Meets standards.
Service Availability	High- and medium-density areas have higher levels of coverage than low-density areas.	Meets standard. Covers 94 percent of population living in high-density areas and 70 percent of population living in medium-density areas.
Distribution of Transit Amenities	Even distribution along routes, standard and uniform amenities to be installed across the service area.	Meets standards.
On-time Performance	Service arrivals five minutes before or five minutes after the scheduled arrival time are considered to be arriving on-time. County sets an 80 percent on-time performance target for the operators.	Meets standards.
Service Change Disparate / Disproportionate Impact	Percentage change of 20 points of minority or low-income passengers on an affected route. Ten percentage points impact for a fare rate change.	Not applicable. No service or fare change necessitated disparate or disproportionate impact analysis.

As the demographics of the Orange County population continue to change over time, OCDP is responsible for monitoring changes in the size, composition, and location of transit-dependent and disadvantaged populations within the service area. To accommodate the needs of these populations arising out of changes to the demographic profile might require modifications to transit routing and scheduling of existing services and in some cases starting new services.

While transit operators are responsible for engaging members of affected communities due to potential service changes like re-routing of existing transit routes and changes to schedules, or introduction of a new service, Orange County will continue to maintain an overall understanding of community needs at the county level, while demonstrating its emphasis on coordination and linkages between transit services provided between communities throughout the County.



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# **Attachment A: Complaint Form**

## **Orange County Title VI Complaint Form**

*Note: The following information is needed to assist in processing your complaint.*

### **Complainant's Information:**

Name:

Address:

City/State/Zip Code:

Telephone Number (Home):

Telephone Number (Work):

### **Person Discriminated Against (if someone other than complainant)**

Name:

Address:

City/State/Zip Code:

Telephone Number (Home):

Telephone Number (Work):

### **Which of the following best describes the reason you believe the discrimination took place?**

Race/Color (Specify)

National Origin (Specify)

Religion

Other

**On what date(s) did the alleged discrimination take place?**

**Describe the alleged discrimination. Explain what happened and whom you believe was responsible (if additional space is needed, add a sheet of paper).**

**List names and contact information of persons who may have knowledge of the alleged discrimination.**

**Have you filed this complaint with any other federal, state, or local agency, or with any federal or state court? Check all that apply.**

Federal Agency                       Federal Court                       State Agency   
State Court                       Local Agency

**If you have checked above, please provide information about a contact person at the agency/court where the complaint was filed.**

Name:

Address:

City/State/Zip Code:

Telephone Number (Home):

Telephone Number (Work):

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

Complainant Signature:

Date:

**Attachments:** Yes  No

**Submit form and any additional information to:**

**Commissioner  
Orange County  
Department of Planning  
124 Main Street, 3<sup>rd</sup> Floor  
Goshen, New York 10924**

# **Attachment B1:**

## **Sample Complaint Tracking Form**

**ORANGE COUNTY DEPARTMENT OF PLANNING**

**Title VI Investigations, Complaints & Lawsuits Log**

NAME	ADDRESS	DATE OF FILING	ID NUMBER	DESCRIPTION	DEPARTMENT OR PERSON FORWARDED TO	ACTION TAKEN AND STATUS	DATE INVESTIGATION COMPLETED	DATE DISPOSED
Complaints								
Investigations								
Lawsuits								

# **Attachment B2: Complaint Intake, Monitoring, and Resolution process**

Person believes they have been discriminated against

Is this complaint with Orange County or a subrecipient?

Orange County

Subrecipient

Person or their representative write a formal complaint

What has to be included?

The complaint must contain the complainant's name, address, phone number, and signature. If complainant cannot provide a signature, their representative must sign.

When does the complaint have to be filed?

Complaints must be filed within 180 days of the alleged discrimination.

How can someone send in their complaint?

Complaints can be mailed to:  
Attn: Commissioner  
Orange County  
Department of Planning  
124 Main Street  
Goshen, NY 10924

How long does it take for a complaint to be resolved?

Complaints are resolved within 60 days or less.

How is the complaint resolved?

When practicable, notification of findings and actions is sent to the complainant in writing.

# **Attachment C:**

# **LEP Plan**



**ORANGE COUNTY  
DEPARTMENT OF  
PLANNING  
PLAN TO ADDRESS  
INDIVIDUALS WITH LIMITED  
ENGLISH PROFICIENCY (LEP)**



**June 2021**

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## Plan to Address Service to Individuals with Limited English Proficiency (LEP)

Orange County functions as a coordinating agency for transit service providers receiving federal funding in the County using the name "Transit Orange" for identifying individual or coordinated transit services in the County. Orange County provides transit coordination services and administers Federal and State transit funding programs; the County is a Designated Recipient of Federal Transit Administration (FTA) funding for transit capital projects and operation and maintenance expenses and the State Transportation Operating Assistance (STOA) program. Orange County passes through this state funding to various transit operators in the county. Although the Orange County Department of Planning (OCDP) does not directly operate any transit services in Orange County, its responsibility for administering Federal and State funding places the department in an ideal role to coordinate planning and management of transit services throughout the County. The County uses its operator oversight program to review outreach programs and activities of transit operators, and data collected by them to ascertain the effectiveness of their activities. It also uses the operator oversight program to mandate compliance to language assistance and accessibility policies by checking for adherence of transit operators.

This document has been prepared to conform to the Limited English Proficiency (LEP) requirements identified in the document titled, "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons – A Handbook for Public Transportation Providers," which was released by the FTA Office of Civil Rights on April 13, 2007.

OCDP followed the four-factor framework for conducting an LEP needs assessment as laid out in Section V of the Department of Transportation (DOT) LEP Guidance and "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons - A Handbook for Public Transportation Providers". This assisted in determining an appropriate mix of language assistance and prepares language assistance implementation plans that are consistent with the DOT LEP Guidance.

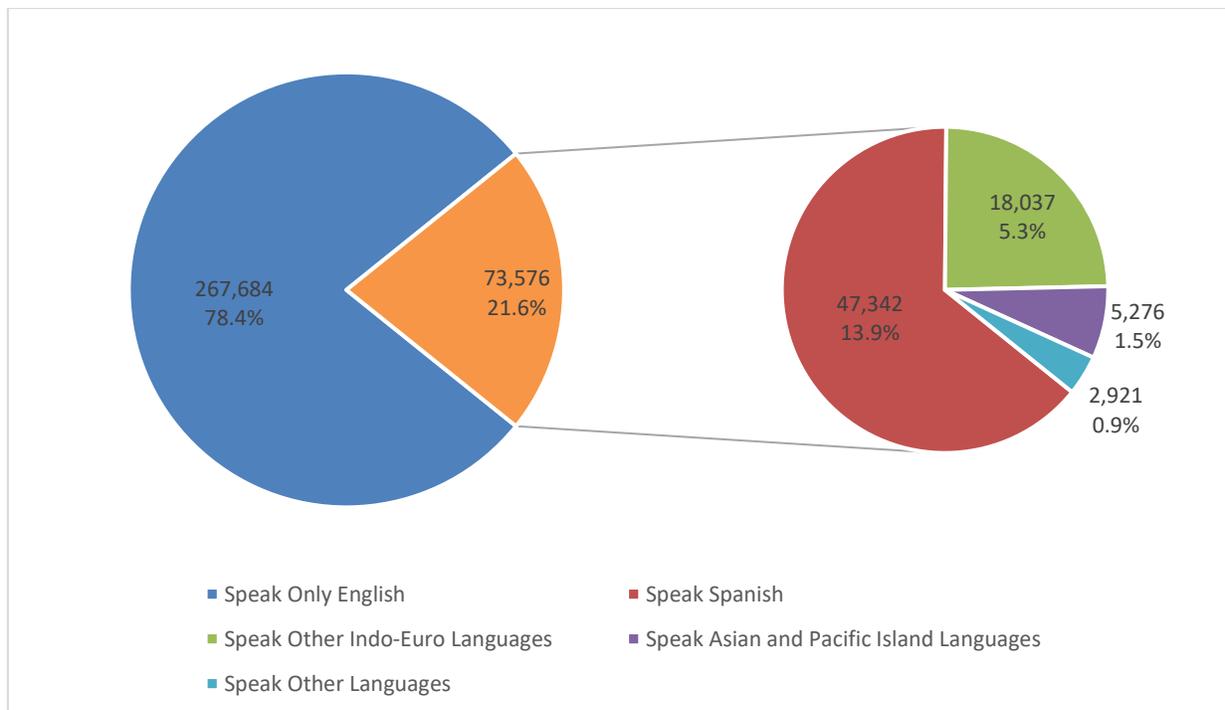
## Factor 1: The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population

All fifteen transit providers in the County operate in various communities spread across most of the County, while some of their services extend beyond the County. For the purpose of this document, the study area includes all of Orange County.

### ***Geographic Distribution of Total Population with Limited English Proficiency***

According to the 2015-2019 American Community Survey, in 2019, Orange County had a total population of 380,085, of which 354,932 were individuals age 5 years and older. Of this population, 78.4 percent speak only English, while the remaining 21.6 percent speak other languages, either in addition to or instead of English, which includes 13.9 percent of individuals age 5 years or older who speak Spanish or Spanish Creole, 5.3 percent who speak Indo-European languages, 1.5 percent who speak Asian and Pacific Island languages, and the remaining 0.9 percent who speak other languages as shown in Figure 1. LEP population is characterized as people who speak a language other than English at home and speak English less than “very well”. Approximately 9.1 percent of Orange County’s total population speak English less than “very well,” which is lower than the 13.2 percent of New York State’s total population who speak English less than “very well.”

Figure 1: Language Spoken at Home (population age 5 or older)

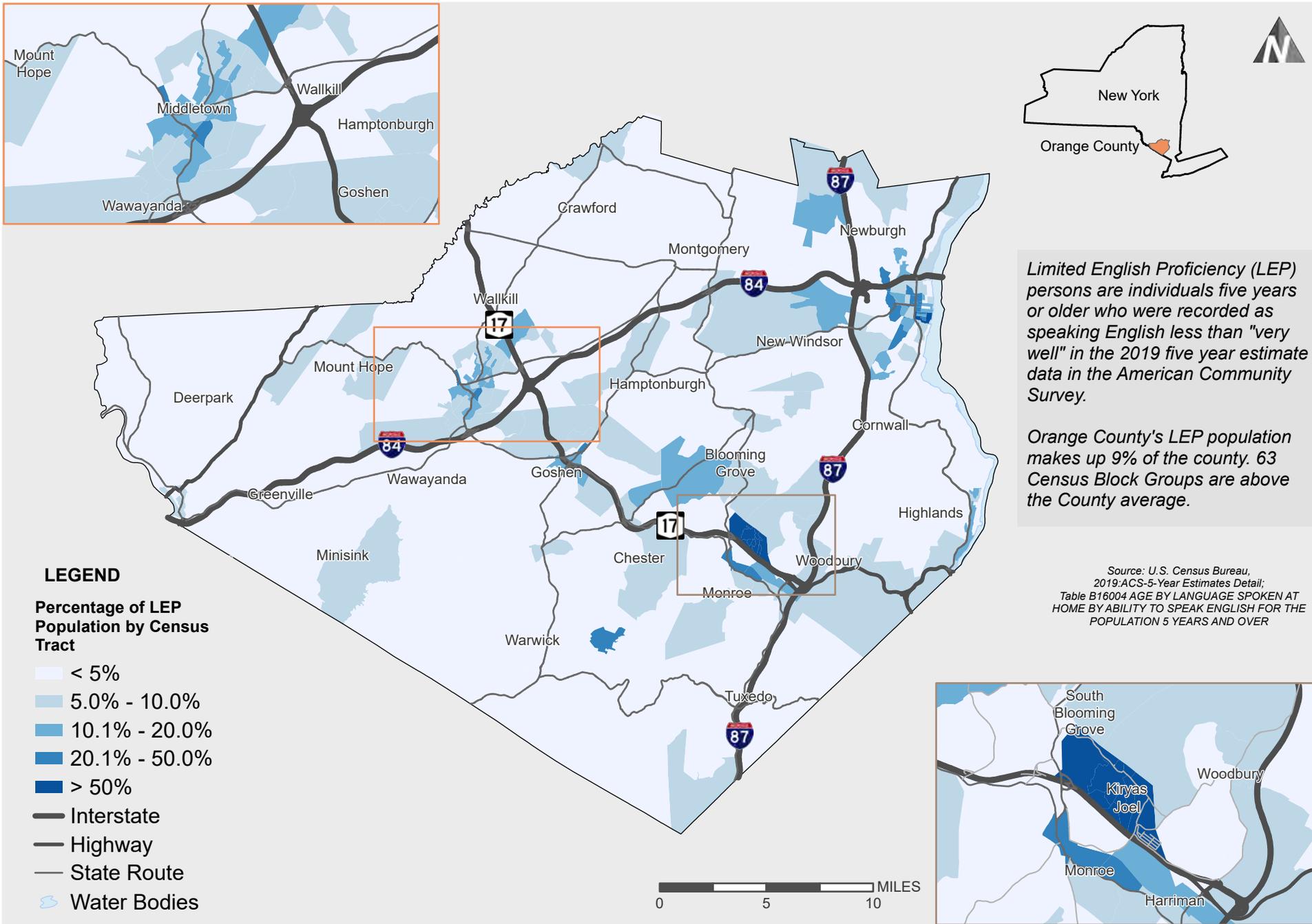


Orange County contains 276 census block groups since the 2010 decennial census, of which 63 contain LEP populations above the County average. These 63 block groups contained 23,586 LEP residents according to the American Community Survey’s 5-year estimates, or 73 percent of the County’s LEP residents. The 63 census block groups containing a higher percentage of LEP individuals than the County average are located in three major areas. The largest cluster of LEP tracts is in the Newburgh, Vails Gate, Glenwood Park and New Windsor area. Though the smallest cluster by number (12) of census block groups is in the Monroe-Kiryas Joel-Harriman area of the County, it has the highest concentration of LEP population with an average LEP population over 60 percent of the total population across the cluster. The other remaining cluster is made up of 15 census block groups in the Middletown area. Figure 2 illustrates the countywide distribution of LEP populations.

The following table shows the top ten LEP populations by language in Orange County, based on the most recent information available. As observed, Spanish and Yiddish meet the Safe Harbor provisions threshold within Orange County.

**Table 1: Top 10 LEP Populations by Language, 2015**

<b>Language/Language Group</b>	<b>LEP Population</b>
Spanish	13,789
Yiddish	10,826
Chinese	714
Italian	439
French Creole	329
Polish	339
Russian	259
Hebrew	361
Korean	345
Other Asian Languages	159



*Limited English Proficiency (LEP) persons are individuals five years or older who were recorded as speaking English less than "very well" in the 2019 five year estimate data in the American Community Survey.*

*Orange County's LEP population makes up 9% of the county. 63 Census Block Groups are above the County average.*

Source: U.S. Census Bureau, 2019 ACS-5-Year Estimates Detail; Table B16004 AGE BY LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER



# Orange County Limited English Proficiency Population

Orange County LEP

FIGURE

## ***Distribution of Population with Limited English Proficiency by Language or Language Group***

Much like New York State overall, the largest share of the LEP population in Orange County speak Spanish as their primary language. Statewide, 49 percent of LEP populations age 5 and older are Spanish speaking, which is more than the Orange County share of 43 percent of the LEP population. Overall, the Spanish-speaking population – LEP and non-LEP individuals included - represents 13 percent of the County's total population age 5 and older.

### ***Spanish***

With the exception of census block groups located in Kiryas Joel and the surrounding areas of Monroe, as well as some census block groups south of Newburgh, near Fort Montgomery, all of the high-LEP census block groups contain a higher percentage of Spanish-speaking LEP persons than the County average. The greatest concentrations of Spanish-speaking LEP persons in the County (over 10 percent of the total population age 5 and older), are concentrated in and around Middletown, New Windsor, and Newburgh, with smaller pockets between Goshen and Monroe. The census tracts which contain the highest concentration of Spanish-speaking LEP persons are served by Middletown Area Transit Newburgh Area Transit, and the Main Line local transit service. LEP populations in these block groups account for over 14 percent of the LEP population overall. Spanish-speakers compose over 90 percent of the LEP population in the areas of Middletown and Newburgh.

### ***Indo-European Languages***

LEP persons who speak Indo-European languages other than English or Spanish are heavily concentrated in the Village of Kiryas Joel and Monroe areas. In the census block groups that make up these communities, LEP persons who speak "other Indo-European" languages are 95 percent of the LEP population.

### ***Asian and Pacific Languages***

LEP persons who speak Asian and Pacific languages make up 100 percent of the LEP population in 14 census block groups, however the total number of individuals in these groups is only 230. While there are no census block groups with a concentration of Asian and Pacific language speaking LEP individuals of more than 100 people, there are 11 block groups with over 50 LEP individuals in this language group. These are located near Highland Falls, Monroe, Orange Lake, Middletown, Newburgh, and Wickham Village.

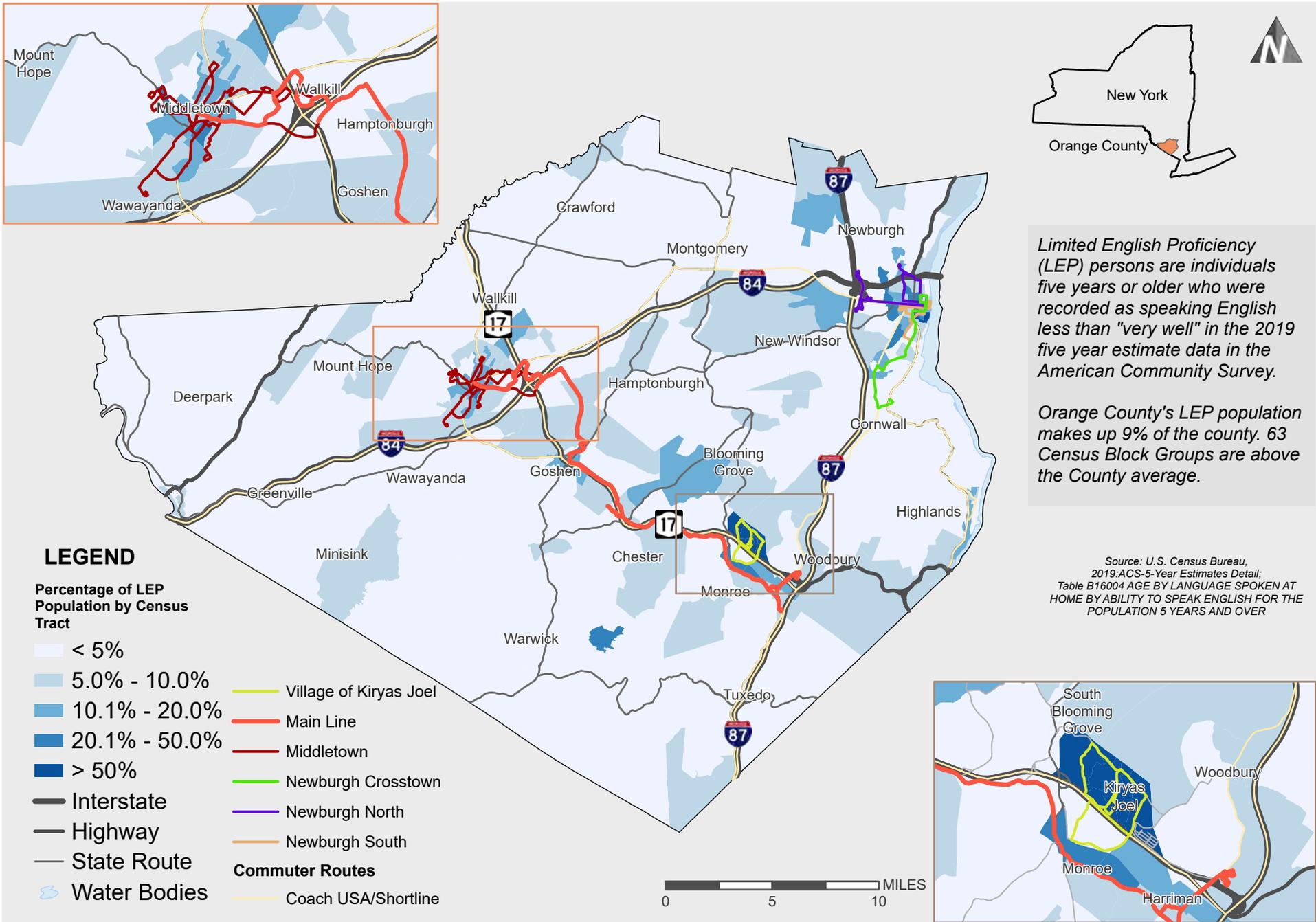
### ***Other Languages***

The primary concentrations of LEP persons who speak languages other than Spanish, other Indo-European languages, or Asian and Pacific languages are located in Middletown, Kiryas Joel and Washingtonville.

### ***LEP Population Concentrations and Transit Service***

The concentrations of LEP populations are predominantly located in three clusters—Middletown, Newburgh, and the Kiryas Joel-Monroe-Harriman region. Respectively, these areas have 15, 21, and 12 census block groups that have LEP populations greater than the County average of 9 percent. These areas are served by local bus routes like the Main Line, Middletown Area Transit, Newburgh Area Transit, and the Village of Kiryas Joel transit service. They are also served by Coach USA/Shortline and Monroe Bus Lines.

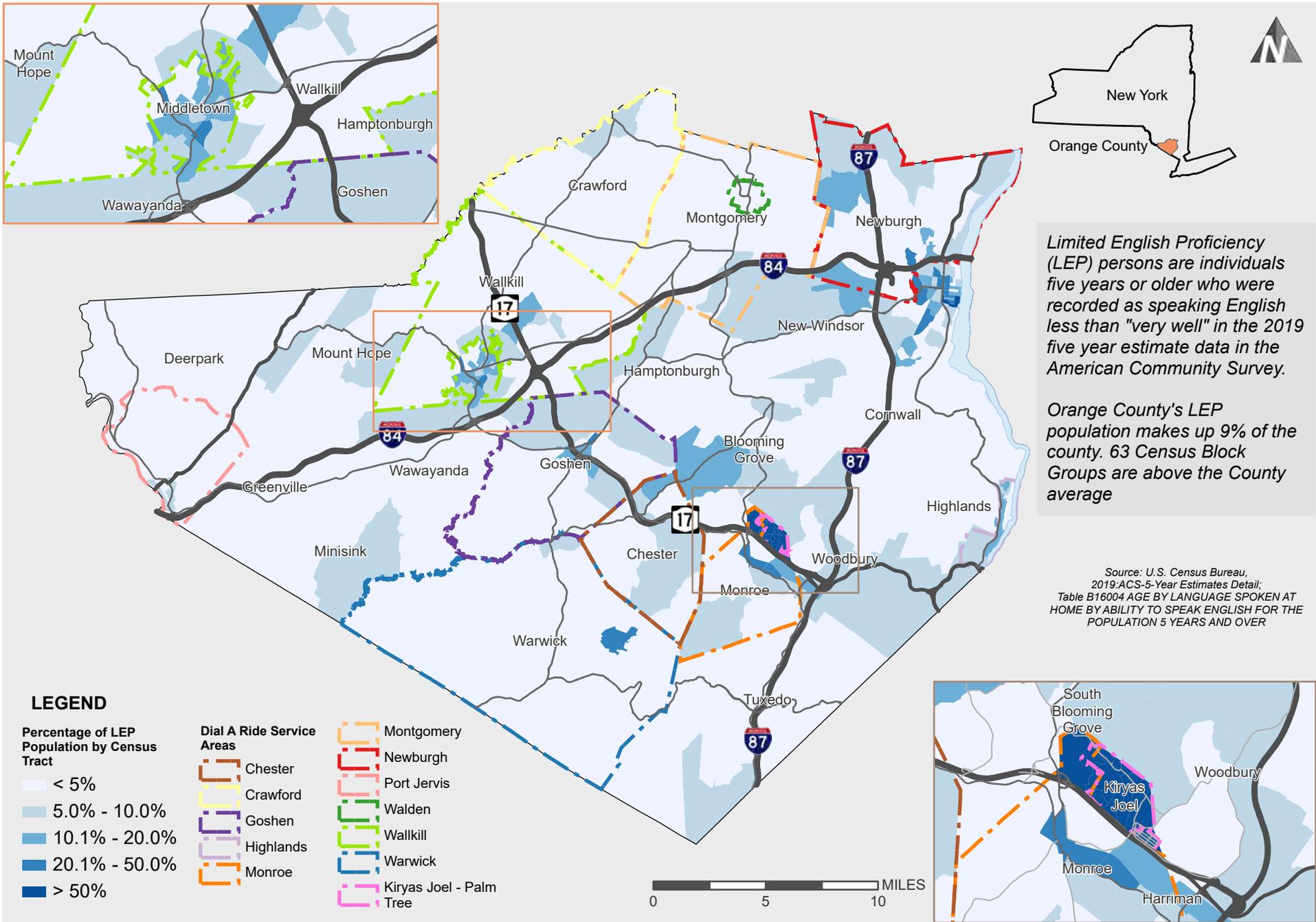
Middletown Area Transit runs four transit service routes in the area of the largest cluster of high-LEP census tracts. Maps showing overlay of commuter and local fixed route transit services, Dial-A-Ride service areas, and paratransit service area maps relative to the LEP population are shown in Figures 3, 4 and 5.



# Orange County LEP Population with Bus Routes

Orange County LEP

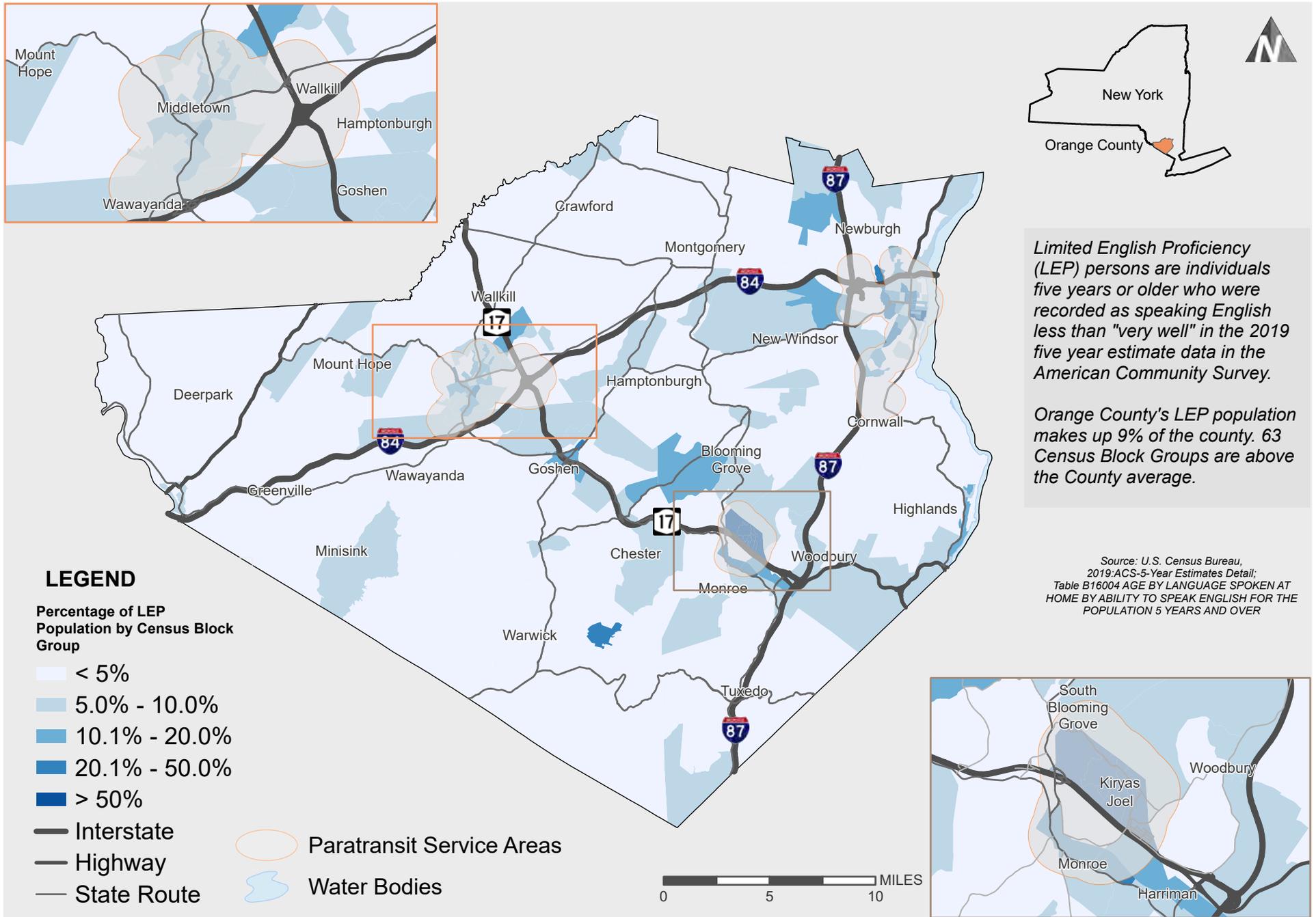
FIGURE



# Orange County LEP Population Within Dial-A-Ride Service Areas

Orange County LEP

FIGURE



*Limited English Proficiency (LEP) persons are individuals five years or older who were recorded as speaking English less than "very well" in the 2019 five year estimate data in the American Community Survey.*

*Orange County's LEP population makes up 9% of the county. 63 Census Block Groups are above the County average.*

Source: U.S. Census Bureau, 2019-ACS-5-Year Estimates Detail; Table B16004 AGE BY LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER



# Orange County LEP Population With Access to Paratransit

Orange County LEP

FIGURE

## Factor 2: The Frequency with Which LEP Individuals Come into Contact with your programs, activities, and services

OCDP performs a multi-pronged array of outreach activities to assess the frequency with which LEP populations come into contact to request service assistance. They include the following:

- **LEP Service Log:** OCDP maintains an LEP Service Log for language assistance. This helps the County keep track of the frequency of questions that the staff receive regarding language services and also the various languages in which the questions are received. This log supplements the Complaint log in enabling the County staff to track the frequency in which LEP individuals interact with programs, activities and services. The Log keeps track of the following details:
  - Date of contact
  - Language service requested
  - Call taker/Contact staff
  - Concerned service/program area
  - Service request in detail
  - Action taken or manner in which the question was addressed

This log helps track the frequency of LEP service contact by date and breaks it down further by language spoken, and by which service or program requested. This will help streamline resources based on language assistance by languages in which the services are sought frequently and also in identifying the types of services which need LEP language assistance more frequently than others. Operators also keep track of recurring requests for a particular service or category, to be able to identify services that are frequently sought by customers.

- **Orange County Transportation Council (OCTC) Meetings:** OCTC is the Metropolitan Planning Organization (MPO) for Orange County. OCTC's meetings (now including the newly established Transit Subcommittee) are open to the public and cover all aspects of transportation planning processes including public transportation services. A complete list of meetings that occurred over the last three years for OCTC is available within the Title VI Plan. LEP contact made during OCTC meetings is recorded in the LEP Service Log along with service requests over the phone or those made in person at the County office.
- **Orange County Transit Workshops:** OCDP will be conducting an annual transit workshop which provides opportunities to get people to use services, travel training, attract new ridership, and answer service-related questions. It is developed as a public outreach program with 1 to 3 meetings conducted annually. A pre-outreach effort is conducted to the LEP population through community organizations and media. Language assistance sought through these workshops will

be documented in the LEP Service Log and processed through the relevant program areas or departments.

- **Operator Outreach:** As part of a continued operator outreach, the County maintains consistent communication with local partners, and thereby in turn with the transit riders by way of engaging community organizations and the business community to understand the needs of the LEP population. For example, transit operators regularly communicate with leaders of community organizations and managers of businesses frequented by LEP populations to understand how they may be able to improve accessibility to services and/or improve services to meet community needs more effectively. Information collected from these outreach efforts are discussed with Orange County planning staff during the quarterly operator oversight meetings. There have been no requests for language assistance received by any of the operators. In cases where English is not the primary language of the customer, scheduling requests have been made by a relative or household member that speaks English.
- **Frequency Monitoring:** Analysis of frequency monitoring through the above-mentioned outreach and customer contact mechanisms indicates that language assistance is seldom sought for Orange County's transit services. The County stipulates operators submit logs of their LEP contact and all requests for translation and language assistance. A majority of transit operators reported that they receive no requests for language assistance. For the few that received requests, the frequency is less than one request per month, with some operators receiving less than five requests per year. Orange County has not directly received any requests for language assistance through any of its outreach and customer contact outlets. When requests for language assistance occur individuals typically are able to speak English as a second language and are requesting information on dial-a-ride and paratransit service eligibility.

## Factor 3: The Importance to LEP Persons of Your Program, Activities and Services

Orange County recognizes that providing public transportation access to LEP persons is critical and that an inability to effectively access and use public transportation may adversely affect Orange County residents' ability to access employment, education, and obtain health care.

Orange County provides a number of services that are important to an LEP person's ability to successfully access information. Among services that are important to LEP populations are:

- **Language Assistance:** OCDP utilizes the services of voluntary translators from across different departments in the County administration, who are fluent in a number of languages, as well as third-party translation services as appropriate. Providing language assistance is typically the first formal interaction the Department has with LEP persons. As such, the Department understands the importance of this service and values it as the first point of contact to current and new customers.

Under Safe Harbor guidance, Orange County provides language translation for all documents identified as vital. Orange County defines a vital document as an electronic or hard-copy document that contains information critical for accessing Orange County's services and/or benefits, and include correspondence or notices to the customer, like consent and complaint forms, intake and application forms, and informative documents providing details about the availability of language assistance provided by the County.

This level of language or translation assistance is provided for each eligible language group that constitutes at least 5 percent, or 1,000 LEP individuals, whichever is less, of the population of persons currently served, or likely to be served by programs in the service area. Currently, Orange County has translated its vital documents in Spanish, and will translate documents into Yiddish upon request. Additional translation services are provided, to the best of Orange County's ability, upon request.

- **Scheduling:** Orange County makes schedules available in a bi-lingual format and service operators provide scheduling information in areas of LEP concentrations other than English and Spanish through leveraging community groups. Additionally, a trip planner is provided on the Transit Orange website, which has the ability to be translated, for example through free online services like Google Translate.
- **New Ridership Attraction:** New riders from the LEP population are oriented towards using the system effectively for their mobility needs by organizing service operator outreach programs and transit workshops.
- **Transit Information Relay:** Outreach activities, including public meetings, which are organized due to major service changes (including fare increases and route changes) are instrumental in communicating transit information to the LEP population since they are among the potentially affected parties due to service changes, because of their higher dependence on transit.

- **Travel Training:** During transit workshops or upon request Orange County staff will facilitate travel training programs to any traveler (including LEP persons or populations) in order to educate them on available services, travel safety, transfers, system navigation, and general independent travel within the system.
- **Rider Survey:** Orange County conducted a countywide on-board ridership survey in the spring and summer of 2017 to better understand travel behavior; examine patterns of service usage, fare media preference, and rider disposition towards transit; collect rider satisfaction data to inform short- and long-term service enhancements; and collect data to support long-range planning efforts. The efforts were completed using survey forms provided in multiple languages (English, Spanish, and Yiddish), targeting specific communities in the LEP population. A subsequent on-board survey will be performed in Fiscal Year (FY) 2022 that will more broadly cover the County's fixed-route and demand responsive services. As part of this update, more expansive survey options will be considered to help understand the overarching mobility needs, including those not currently served by traditional transit services.

Additionally, OCDP, at times in partnership with OCTC, oversees several programs, tasks, and initiatives that provide benefit to the county's LEP population. This includes the following:

- **Coordinated Transportation Plan:** The Coordinated Public Transit Human Services Transportation Plan (Coordinated Plan) was first prepared in 2008 and adopted in October 2008. Developed in accordance with federal transportation law enacted via the Moving Ahead for Progress in the 21<sup>st</sup> Century Act (MAP-21), the plan sets the baseline for assistance of the elderly, disabled individuals and other groups in need of further assistance. An interim update was prepared in order to specifically address MAP-21 and the plan update was approved in June 2015. A more comprehensive update of the Coordinated Plan was prepared in September 2018 to address further legal provisions provided in the Fixing America's Surface Transportation (FAST) Act.

In concert with the Coordinated Plan, a Coordination Council has been established that includes transit planners, human service agencies, transportation coordinators, transit operators, and county residents. The Coordinated Council meets periodically with the goal of identifying creative strategies which effectively serve the transit and transportation needs of residents; improve quality and accessibility of services; and reduce or eliminate duplicative service through better coordination and a more holistic examination of costs and spending. Going forward, updates to the Coordinated Plan will be completed as needed based on future legal provisions and actionable outcomes of the Coordination Council.

- **Operator Oversight Program:** OCDP staff meet with transit operators on a regular basis. As part of each operators' annual review, Orange County staff review the current Title VI Plan, each operator's LEP obligation, and discuss how each operator is pro-actively reaching out to minority, low-income, and LEP populations residing within their service areas to increase transit awareness and grow ridership.

Due to the decentralized nature of transit services among the fifteen different transit operators in the County, transit operators have a good understanding of the local community requirements in distributing transit service information. However, the County has an overall understanding of

its community needs and the linkages between different communities. The operator oversight program provides the opportunity for collaboration between these two branches, allowing for more effective planning, facilitation and implementation of public transportation initiatives.

- **Inter-Agency Engagement:** OCDP staff actively engage other County agencies who interact with minority, low-income, and LEP populations (such as the Work Force Investment Board, the Employment & Training Administration, and the Office of the Aging) to inform agency staff of available transit services to their consumers. They also promote a better understanding of their consumers' transportation needs (such as access to popular employment destinations, housing facilities, and shopping locations) as well as perceptions of the current transit system.

The County also provides pro-active training in the area of transit for other departments and agencies who may be in contact with LEP populations for other community needs, such as health and human services, to facilitate knowledge transfer to LEP populations.

## Factor 4: The Resources Available to Recipients and Their Costs

Orange County allocates resources based on the demand for language assistance services. The County is constantly exploring the need for cost-effective means of delivering these services within a resource-constrained environment.

### ***Vital Documents:***

The following summarizes a list of vital documents identified as crucial to a service provision standpoint:

- Title VI Plan
- On-Board Title VI Rights Notification
- Title VI Policy Statement
- Title VI Procedures for Public Comment
- Title VI Complaint Form
- Limited English Proficiency (LEP) Plan
- Fixed Route Service Schedules and Maps
- Half Fare Description
- ADA Paratransit Service Operating Policies
- ADA Application Form
- On-Board Safety and Security Awareness Signage

### ***Hours and Costs Dedicated to LEP-Related Services***

As part of Orange County's system programming, the County provides language assistance at no additional cost. However, Orange County staff and consultants spend a notable amount of time on tasks that pertain to LEP-type services and providing language assistance. The following summarizes the resources spent by Orange County staff and consultants for LEP-related service provisions:

- **Language Assistance** [46 hours] – Actively providing one-on-one language assistance for an individual (in-house or third-party)
- **Public Engagement** [160 hours] - Outreach activities including transit days, public meetings and workshops, such as those prompted by major service changes (including fare increases and route changes), and relaying transit information to the public.
- **Travel Training** [104 hours] – Engaging with passengers to educate them on available services, travel safety, transfers, system navigation, and general independent travel within the system. This task is not limited to LEP individuals but is included as it is a fundamental aspect of encouraging and supporting public transit usage.

- **Staff Training** [70 hours] – In-house training conducted and attended by Transit Orange staff and its sub-recipients.
- **Operator Oversight** [240 hours] – Encompasses the full program that provides sub-recipient oversight. It is implemented through regular meetings as well as providing technical assistance, as needed. Once per year, at a minimum, Title VI/LEP protocols and processes of sub-recipients are reviewed for compliance.
- **Vital Document Development and Review** [230 hours] – Ensuring Transit Orange documents and on-board signage are compliant with federal regulations, and remain in compliance, are up to date based on the most recent data available, consistent with OCTC and County policies, and developing new policies, as required.

Collectively, Transit Orange and its sub-recipients have dedicated approximately 850 hours to LEP-related services at a cost of approximately \$30,000 annually.

### ***Providing Language Assistance for Relevant Programs, Activities, and Services***

OCDP utilizes the services of voluntary translators from across different departments in the County administration, who are fluent in a number of languages including Spanish, French, Egyptian, Italian, Polish, Hungarian, Hindi, and Tagalog. Government employees, who fulfill translation and interpretation services on a voluntary basis, in addition to their primary roles and responsibilities, are documented on a list, with contact information, for easy access when necessary. All employees have this list and reach out to the appropriate person, when the language is known, to assist residents with their needs.

The County makes use of translation services to assist LEP residents contacting the County via telephone for transit assistance and/or information. OCDP is also examining opportunities to expand their ability to access LEP populations, specifically by researching translation and interpretation services.

All Transit Orange service documentation is accessible to LEP populations and transit operators are developing bi-lingual schedule and service information (Kiryas Joel, being unique due to its language distribution has information in English, Spanish, and Yiddish).

OCDP has not received any language assistance requests since the last Limited English Proficiency Plan submission.

### ***Training Orange County Staff***

County staff are required to take part in the County's Orientation Program which reviews overall County policies and a separate half-day sexual harassment and discrimination awareness/training program. Also, all discrimination policies are posted within OCDP offices. In addition, new OCDP staff meet with the Transit Coordinator to review and become familiar with the County's demographic profiles, available transit services, and the policies and procedures outlined in the Title VI report. Additionally, OCDP staff are educated on the importance of reaching out and providing transit information to the different economic and ethnic populations within Orange County. In order to meet this objective, all County personnel, including transit staff, are trained in the County's voluntary translator program and additional translation services to best assist individuals who contact the Department in need of language assistance.

Transit operators require drivers and office staff to successfully complete a new employee orientation program. Within these programs transit operator managers review transit safety, ADA compliance, sensitivity training, and sexual harassment and discrimination training. Within the sexual harassment and discrimination training, transit operators make drivers and staff aware of the populations their transit system serve. They also inform drivers and staff of the protocols for assisting transit dependent LEP persons in using the transit system and addressing their questions, comments, or complaints. Additionally, transit operator personnel are made aware of the County's language assistance program.

### **Providing Notice to LEP Persons**

OCDP and its sub-recipients post the County's Title VI Policy Statement through various media outlets, centered around the Department's transit website – [www.transitorange.info](http://www.transitorange.info), which has the ability to be translated, for example through free online services like Google Translate.

In addition, all Orange County transit vehicles are equipped with English and Spanish signage informing passengers of Orange County and its sub-recipients' commitment to providing nondiscriminatory service and passengers' rights under Title VI. Moreover, bi-lingual signage (Figure 6) informing passengers of how to contact Orange County with any comments or complaints are posted on-board vehicles and in public facilities. The County's formal complaint procedures are in place to allow individuals to submit grievances, have the complaint investigated by the Orange County Planning staff, and provide resolution to the grievance. All grievances are tracked within the Title VI Complaint Log and all information and documentation associated with each complaint is cataloged in the log as well.

**Figure 6: On-Board Title VI Notification Signage – English & Spanish**



All planning activities and notices which are advertised to the press are shared with media sources that serve a variety of Orange County's LEP communities. Such publications include official newspapers like Orange County Post, Straus Newspapers, Warwick Valley Dispatch, News of the Highlands, Der Blatt, Time Community Newspapers, and Hudson Valley Press. County legislative branch also publishes notices in the Times Herald Record, though it is not an official newspaper.

## Monitoring and Updating the LEP Plan

While OCDP strives to best assist LEP persons who speak various languages there may be instances when activities will necessitate the provision of information and notices in additional languages. Orange County will perform an annual review of LEP transit analysis from the data provided by the transit operators as a part of their Federal Transit Administration (FTA) National Transit Database (NTD) reporting requirements and will continue to perform and submit an equity analysis for every major service change and/or fare modification enacted by any transit operator.

Orange County policy stipulates that any significant proposed service change or fare modification by a transit operator must first notify the County; the County then models the service change (for example, a route change or fare increase) and overlays it using GIS to ensure that a disproportionate share of the LEP population are not being adversely affected by the service change or fare modification.

Along with this, an intent of service change is provided to the County before providing notification to the general public about any service change and should go through the screening procedure explained above to make sure that the LEP population is not being adversely affected due to these changes. The County will direct transit providers to take corrective action in case of any disparities due to the effects of service changes on LEP population. This analysis is conducted for each significant proposed service change or fare modification by a transit operator.

Additionally, OCDP conducted a countywide on-board ridership survey for all bus routes operated on the Department's behalf, during different parts of the service schedule day (morning, evening, late night, for example) in order to collect a sample of data that represents various sub-populations of transit ridership. This monitoring effort has enabled OCDP to observe how well the transit services are meeting the Department's standards and policies regarding equal and fair treatment for all users; it also identified opportunities to enhance service. As a result of this survey, OCDP has implemented several initiatives to improve access to transit based on feedback received from riders. Ongoing efforts include a full overhaul of the Transit Orange website to improve ease of access (including integration of an online trip planner), identification of opportunities to deploy CAD AVL software, and exploration of new ridership markets and non-traditional transit alternatives to bolster transit access to and from major employers throughout the county.

A subsequent on-board survey will be performed in FY 2022 that will more broadly cover the County's fixed-route and demand responsive services. As part of this update, more expansive survey options will be considered to help understand the overarching mobility needs, including those not currently served by traditional transit services.

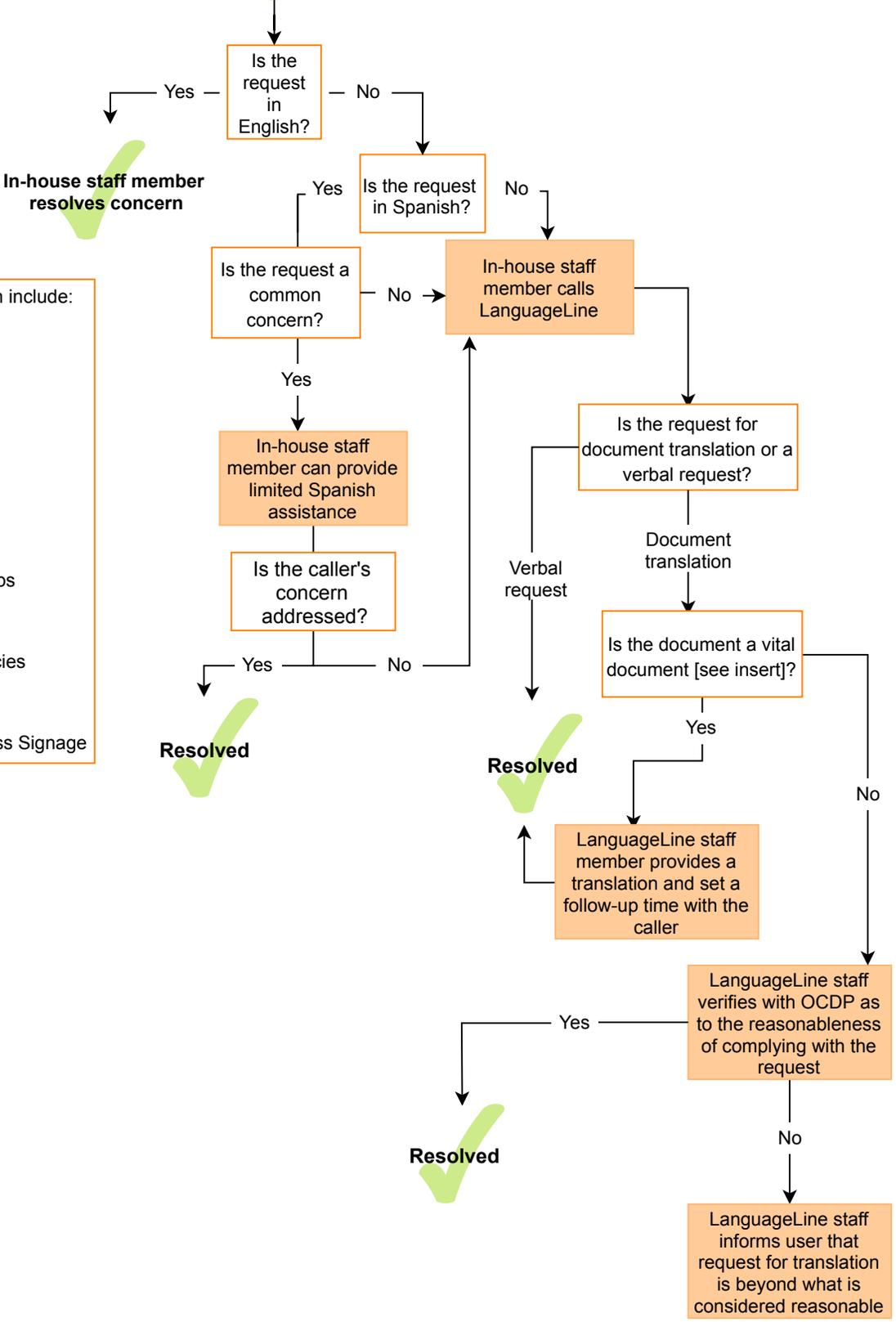
In addition to the survey and technical analysis, the Operator Oversight Program will continue to perform quarterly on-site visits with transit operators. This program serves four primary functions to monitor Title VI and LEP regularly; they include:

1. Review of each transit operator's Title VI Complaint Log. If any complaints have been reported and/or are in the complaint log, OCDP staff will:
  - a. Examine the documentation associated with the complaint;

- b. Review the findings and resolution of the complaint; and
  - c. Follow up on any previous complaints to ensure agreed upon resolutions are being or have been performed.
2. Review pro-active outreach activities for each transit operator.
3. Work with operators to review findings from current Title VI and LEP plans and analyses; this will occur in conjunction with findings from the “road” and the community to establish actionable opportunities that enhance LEP and minority usage of transit services.
4. Update the Title VI and LEP Plans to include findings and opportunities identified through the monitoring program.

# **Attachment D: Orange County Language Assistance Process**

**Language assistance request received by OCDP**



- Vital documents** available for translation include:
- Title VI Plan
  - On-Board Title VI Rights Notification
  - Title VI Policy Statement
  - Title VI Procedures for Public Comment
  - Title VI Complaint Form
  - Limited English Proficiency (LEP) Plan
  - Fixed Route Service Schedules and Maps
  - Half Fare Description
  - ADA Paratransit Service Operating Policies
  - ADA Application Form
  - On-Board Safety and Security Awareness Signage

# **Attachment E: Public Involvement Procedures**

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## Executive Summary

This document, referred to as the Public Participation Plan (PPP) or simply as “the Plan”, provides a framework for the Orange County Transportation Council (OCTC), the Metropolitan Planning Organization (MPO) for Orange County to include stakeholders in the decision-making process for future and ongoing projects, plans and activities that help maintain and improve transportation in Orange County. This process is referred to interchangeably as Public Involvement, Public Engagement, and Public Participation and is an important step in the overall transportation planning process in Orange County.

The Plan is broken into two parts. **Part 1: Understanding the MPO** lays the foundation for the requirements and necessary information to understand the OCTC and the transportation planning process. *OCTC Overview* provides a brief summary of the OCTC and its committees; *MPO Core Functions* outlines the MPO’s required work products and *Participation Procedures* connects the core MPO products and other transportation planning studies and activities with the *Public Participation Process* outlined in Part 2; *Regulations* outlines the federal and state requirements that regulate public participation and how the OCTC integrates these requirements into its practices, including the OCTC’s *Non-Discrimination Policy and Complaint Procedures*.

**Part 2: Public Participation Process** provides a complete overview of OCTC’s approach to public involvement as it relates to the MPO’s products and activities outlined in **Part 1**. This includes the purpose statement and goals, which are the guiding principles of the PPP, as well as identifies Stakeholders; *Diversity & Inclusiveness* highlights the importance of Orange County’s growing and diverse communities and offers *Strategies for Inclusiveness* to identify barriers of outreach and to engage with hard-to-reach communities; and *Strategies for Outreach* outlines the *Spectrum of Public Participation* and *Outreach Toolbox* for public involvement, including descriptive strategies that can be utilized in engagement; Lastly, the OCTC establishes ways to evaluate the success of strategies and engagement efforts, as well as evaluate the overall effectiveness of the Public Participation Plan in *Monitoring & Evaluation* and establishes a process for updating the plan in *Update Procedure*.

In addition to the two (2) main parts of this Plan, there are also two (2) appendices, including **Appendix A: State and Federal Regulations** which provides more information on requirements that impact public participation, including non-discrimination legislation; and **Appendix B: Community Demographics** features maps and socio-economic and demographic information of Orange County to help identify populations when creating an outreach strategy.

The PPP is meant to be used by practitioners and the public to better understand the OCTC, its activities, and how the MPO intends to involve stakeholders and the public in the transportation planning process. The OCTC will conduct outreach on the development of the Public Participation Plan to ensure the purpose statement and goals reflect the vision for public engagement in Orange County.

Please visit the OCTC’s website at [orangecountygov.com/octc](http://orangecountygov.com/octc) for more information on the MPO and its work products, or to be added to the OCTC Contact list. To comment on this Plan, or to contact MPO staff, please email [octc@orangecountygov.com](mailto:octc@orangecountygov.com).

## Introduction

The Orange County Transportation Council (OCTC) is the designated Metropolitan Planning Organization (MPO) for Orange County and is referred to interchangeably throughout this Plan as “the MPO”. The OCTC is responsible for ensuring federal and state dollars spent on existing and future transportation projects and programs are based on continuing, cooperative and comprehensive planning. MPOs are required to develop a documented public participation plan that facilitates involvement in the metropolitan transportation planning process by all interested parties. This Plan identifies federal guidelines for public participation and is meant to compliment other regulatory documents for involvement, such as the OCTC’s Operating Procedures, Title VI/Non-Discrimination Policy, and Limited English Proficiency (LEP) Plan.

Orange County is located in the Mid-Hudson Valley Region approximately 60 miles north of New York City. The geographic features of the region make it home to a mix of rural, suburban, and urban areas with three cities, eighteen villages, and twenty-two towns. Orange County continues to see positive population growth, while many counties in New York have experienced population loss. As the population continues to grow and become more diverse, the expectations and needs from the transportation system are also evolving. This, matched with the growing innovation in transportation technology, brings new challenges to balancing transportation funding and priorities.

With improvements in technology, new communication trends, an increasing and diverse populace, and ongoing federal requirements, MPOs must explore new ways to engage stakeholders, present programs in understandable formats, and most importantly, hear concerns, opinions, and ideas of Orange County residents. The OCTC recognizes that barriers to effective public involvement exist and strives to create an inclusive process for participation. As the MPO explores new technologies and trends, it must balance overall effectiveness, inclusion, and fairness of the outreach process.

Mobility has a tremendous impact on many activities for Orange County residents, visitors, and neighboring communities. The OCTC is proud of strong partnerships with local residents, advocacy and interest groups, as well as state and federal agencies, and will continuously strive to improve efforts to include others in planning and policy work. A meaningful public participation plan is guided by more than just federal requirements; it is a valuable tool used by the MPO with the goal of making sure transportation investments meet the needs of the public and other stakeholders in both the present and future.

## Part 1: Understanding the MPO

The OCTC is responsible for fostering inter-municipal cooperation and coordinating transportation planning activities among municipalities and government agencies to fulfill countywide and regional planning objectives, develop capital improvements, and facilitate public services. A large part of this work involves planning transportation improvements for Orange County and the Mid-Hudson region in conjunction with the New York State Department of Transportation (NYSDOT), the MPOs in the Mid-Hudson Valley Transportation Management Area (TMA), as well as other agencies, such as the New York State Thruway Authority (NYSTA), the New York State Bridge Authority (NYSTA), the Port Authority of New York and New Jersey (PANYNJ), and the New York Metropolitan Transportation Authority (MTA).

Since 1982, the OCTC has been the designated MPO for Orange County. By federal law, an MPO is designated by each state's governor for every urban area in the United States with at least 50,000 residents. MPOs are tasked with certain responsibilities in accordance with federal transportation legislation. The most recent legislation is [Fixing America's Surface Transportation \(FAST\) Act](#), which became effective in December 2015. These tasks include looking at regional transportation issues, which involves addressing land use, air quality, natural resources, economic development, commerce, and quality of life.

### OCTC Overview

The OCTC is comprised of a Policy Board, a Planning Committee, and subcommittee or advisory committees as needed. The Policy Board is the governing body of the OCTC, which meets on an as needed basis. The Planning Committee is comprised of various agency and municipal representatives and meets monthly. *Table 1: OCTC Overview* shows the roles and responsibilities of the Policy Board, Planning Committee, and subcommittees, as well as details for public participation in meetings. All OCTC Planning and Policy Committee meetings follow NYS Open Meetings Law and will include a hybrid approach for in-person and virtual participation. The virtual option may include access via a virtual meeting platform and/or a call-in option. For more information on how the OCTC structure is comprised and membership information, please visit the [OCTC Operating Procedures](#).

**Table 1: OCTC Overview**

	Overview	Responsibility	Meeting Frequency
Policy Board	Governing body of the OCTC and provides direction and establishes policy regarding the roles and responsibilities of the OCTC as the designated MPO for Orange County.	Approve all MPO activities and work products, including the Long Range Transportation Plan (LRTP), Unified Planning Work Program (UPWP), and Transportation Improvement Program (TIP).	As needed
Planning Committee	Oversees the technical aspect of the OCTC and provides professional and technical recommendations to the Policy Board.	Review work products and recommend actions to the Policy Board.	Monthly
Subcommittees	Established by the Planning or Policy Committees to act in an advisory role, work on specific tasks, or handle Committee issues.	Inform the Planning Committee on specific transportation related initiatives.	N/A

Policy Board and Planning Committee meetings are open to the public. Members of the public are invited to offer comments during the designated public participation section of the agenda on any item relevant to the agenda or

the transportation planning process. The public also has the opportunity to provide comments on any agenda item as it is being discussed, with the approval of the chairperson, and as time permits. Comment times may be limited.

Subcommittees may be established for particular tasks by the Policy or Planning Committees. These tasks may include acting in an advisory role, addressing Committee issues, completing specific work items or special tasks. Subcommittees may be formed or dissolved as needed. Subcommittees, such as the Transit Subcommittee, may include OCTC members and representatives from the public and share meeting materials online.



Figure 1: Graphic of OCTC Structure from Long Range Transportation Plan (2019)

## Regulations

As a recipient of funding from federal transportation programs, the OCTC is subject to legislation and regulations at the federal, state, and local level. These laws include the current and preceding federal transportation bills, transportation regulations, non-discrimination legislation, and local laws to ensure an open and fair transportation planning process. Information on regulations is provided to help identify legal requirements related to engaging the public that were created to protect and promote good practices. To understand the broader context of those requirements, refer to the complete statute, regulation, or executive order. See [Appendix A](#) for more information.

### *Federal Highway Administration (FHWA) and Federal Transit Administration (FTA)*

Basic public participation requirements have been established by law, as in the Administrative Procedures Act and the National Environmental Policy Act (NEPA), and by regulations and guidance issued by federal agencies including the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), and the Environmental Protection Agency (EPA). These regulations establish the minimum requirements for making information available, providing notice to, and consulting the public, holding public hearings and meetings, establishing advisory groups, and inviting comment from the public.

### *Fixing America's Surface Transportation (FAST) Act*

The current transportation bill is the Fixing America's Surface Transportation (FAST) Act. It was passed by Congress and signed by President Obama on December 4, 2015. The FAST Act authorizes \$305 billion nationwide over fiscal

years 2016 through 2020 for transportation spending. The FAST Act includes provisions to support and enhance previous transportation legislation (MAP-21) reforms. Public involvement remains a hallmark of the planning process.

### **MPO Core Functions and Work Products**

Federal requirements stemming from the FAST Act and similar legislation passed by Congress dating back to 1991 mandate that OCTC have and maintain a coordinated planning process that produces several planning products, which serve to frame the region's transportation planning decision making; OCTC's planning process is also required to ensure the region's continued eligibility for federal planning and capital funds. OCTC's major planning products are a Long-Range Transportation Plan (LRTP) that maintains a 20-year planning horizon, a short range (three to five year) Transportation Improvement Program (TIP), an annual Unified Planning Work Program (UPWP), and Air Quality Conformity (AQC) determinations that accompany the LRTP and TIP process.

#### *Long Range Transportation Plan (LRTP)*

The LRTP provides a framework for planning, policy, and investment decision making within the Orange County planning area. It addresses at least a 20-year planning horizon and includes both long- and short-range strategies and actions that lead to the efficient movement of people and goods by maintaining and developing an integrated transportation system. The [LRTP is available online](#) at the OCTC website, or by request.

Federal law requires that any MPO in an air quality non-attainment or maintenance area review and update their LRTP every four years. See [Air Quality Conformity](#) for more information.

#### *Transportation Improvement Program (TIP)*

The TIP is a federally mandated five-year multi-modal capital program that lists agreed upon priority projects to be funded/built using a combination of federal, state, local, and private transportation dollars. Projects on the TIP must be consistent with the goals and objectives found in the LRTP, and the TIP is generally updated with the Statewide TIP (STIP), which occurs every two to three years, but no less than four. The New York State Department of Transportation (NYSDOT) is responsible for the STIP, and OCTC works cooperatively with NYSDOT Region 8 on this process. The [TIP is available online](#) at the OCTC Website, or by request. Procedures for TIP Administrative Modifications and Amendments can be found in the [OCTC Operating Procedures](#).

#### *Unified Planning Work Program (UPWP)*

The UPWP is a federally mandated program that utilizes Federal Highway and Federal Transit planning funds. It describes the planning studies and related activities that will be undertaken by the MPO and its members to identify transportation needs, formulate strategies to address those needs, evaluate potential solutions, and detail the specific alternatives that best meet the identified needs and will move the region toward its goals. The [UPWP is available online](#) at the OCTC website or by request.

#### *Air Quality Conformity (AQC)*

Air Quality Conformity or Transportation Conformity is a required process by which the MPO ensures that transportation projects or investments will not significantly impact a region's ability to meet or maintain federal air quality standards. As part of the Air Quality Conformity process, OCTC prepares a Conformity Determination to demonstrate that the LRTP and TIP are in compliance with the mobile source emissions budgets for the air quality nonattainment and maintenance areas. The OCTC works with the New York State Interagency Consultation Group (ICG) to assess project classifications and identify whether certain projects are exempt from the air quality conformity process. Exempt projects have little to no impact on air quality or address a safety issue. Projects that are expected to have an impact on air quality are classified as Non-Exempt and need a project-specific analysis. OCTC works cooperatively with the NYSDOT to conduct the required emissions analysis and develop documentation, which is then submitted to the FHWA, FTA, and USEPA in the form of a Conformity Statement.

Concurrent with the publication of this plan, the OCTC is in the NY-NJ-CT Maintenance Area for Fine Particulate Matter (PM 2.5) and in the Poughkeepsie-Newburgh Ozone Non-Attainment Area (PONA).

## Participation Procedures

The required work products make up the Core Function of the MPO and require adherence to specific guidelines, as detailed in *Table 2: Work Products & Procedures*. For more information regarding the public participation process as it relates to the UPWP, TIP, LRTP, and ACQ, please see the [OCTC Operating Procedures](#).

**Table 2: Work Products and Procedures**

Major Activities or Programs	Participation Procedure	Public Review Period	Update Cycle
Long Range Transportation Plan (LRTP)	Public in-person and/or virtual meetings will be held around the County to discuss issues, goals, and potential actions and recommendations during the update process. These meetings will be held at various times of the day to accommodate availability, with all public meeting notices and relevant materials made available on the website and shared directly with those included on the <i>OCTC Contact List</i> . All public comments will be summarized and included in the final LRTP as an appendix. Amendments to the LRTP will be discussed by the Planning Committee and made available for public comment.	30 Days	4 Years
Transportation Improvement Program (TIP)	A specific TIP update meeting will be held by the Planning Committee to discuss the TIP development process, projects on the existing TIP, and proposed projects being considered for addition to the TIP. Amendments and modifications made to the TIP will also be discussed by the Planning Committee before public comment begins.	14 Days	2-3 Years
Unified Planning Work Program (UPWP)	The annual UPWP update and any amendments will be discussed during a Planning Committee meeting(s), giving the public the opportunity to comment. The draft UPWP document is made available for public review and comment before adoption.	14 Days	Annually
Public Participation Plan (PPP)	The PPP update will be shared with stakeholders before a Planning Committee meeting discussion, with the final draft being made available for public comment before adoption. All public comments received will be summarized and included in the final version as an appendix.	45 Days	5 Years
Air Quality Conformity (AQC)	The Conformity Determination will be introduced to the Planning Committee, giving the Committee and public the opportunity to comment. The final document will then be issued for the public comment period. All public comments received will be summarized in the final document. The update cycle is determined by actions that could affect regional emissions, and therefore accompany an LRTP and TIP update. When AQC is triggered by another agency in the non-attainment or maintenance area, and OC does not have any significant updates, members will be notified and provided the document for review and comment if a Planning Committee meeting is unable to be held before public comment is set to begin.	30 Days	As Needed

## Other MPO Functions

Outside of the core work products, the MPO undertakes other transportation planning work efforts that look at both the short and long-term issues facing the county and region. These work efforts can include things like studies, analyses, and policy development. There is no prescribed public review period or update cycle for these planning initiatives, but they do offer the opportunity to develop a unique public participation strategy that best meets the goals and target audience of the study or activity. When appropriate, a specific schedule and plan for

public participation will be developed for these work efforts independently. The OCTC will direct staff and consultants to the [Public Participation Process](#) and [Outreach Toolbox](#) to ensure all planning activities, programs, and study/plans match a consistent public participation template and similar strategies are deployed.

### **Non-Discrimination Policy & Complaint Procedure**

The OCTC also follows various State and Federal regulations on Public Participation including [New York State Open Meetings Law](#), as well as [Title VI](#) and [other non-discrimination statutes](#) to ensure that the transportation planning process is fair and open for anyone who is interested in participating. The OCTC has developed a [comprehensive process for public involvement](#) that integrates these mandatory requirements into its practices, as well as provides opportunities to create a comprehensive and inclusive environment for engagement.

[Title VI of the Civil Rights Act of 1964 \(Title VI\)](#) and [Executive Order 12898 on Environmental Justice](#) are specific in the description of the populations they protect. Title VI prohibits discrimination based on race, color and national origin, which also includes [Limited-English Proficient \(LEP\)](#) individuals. Environmental Justice was created to bring federal attention to environmental and human health conditions and protects against inequities in minority and low-income communities. Discrimination against persons based on gender, age, and disability are addressed by other nondiscrimination statutes.

OCTC's commitment to non-discrimination includes the following practices:

- The MPO website and all project websites will be ADA accessible and have the ability to be translated, for example through free online services like Google Translate.
- Projects or Studies that directly affect areas with high LEP populations will provide translated meeting materials, as appropriate and feasible.
- Translation services will be provided to individuals at public or virtual meetings to individuals who request it no less than (5) days prior to the meeting.
- All in-person public meetings will be held at ADA accessible locations and will provide assistance to individuals with disabilities who request it no less than (5) days prior to the meeting.
- In-person public meetings will be held within (1) mile of public transportation routes or stops as feasible, or the MPO will provide alternative opportunities for virtual public participation with a call-in option.
- Plain language and visualization techniques will be used to help the public understand transportation issues and outreach materials.
- The OCTC will strive to ensure any visualization techniques such as maps, charts, and graphics are understandable for color-blind individuals.

As outlined in the [Title VI](#) regulations, OCTC is adopting the following **Non-Discrimination Policy** and **complaint procedure**. The Non-Discrimination Policy language will be uploaded to the OCTC website and incorporated into all major work products and plans in the future.

#### *Non-Discrimination Policy*

The Orange County Transportation Council (OCTC) is committed to compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related non-discrimination rules and statutes. OCTC assures that no person or group(s) of persons shall, on the grounds of race, color, age, disability, national origin, gender, or income status, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under all programs, services, or activities receiving Federal financial assistance and administered by the OCTC.

#### *Complaint Procedure*

For those persons who believe that they have been subjected to discrimination under any program or activity administered by the OCTC, a Title VI grievance may be filed via the Title VI Complaint Form or with the Title

VI Officer. The Title VI Complaint Form is available on the [OCTC website](#) or by request. The Title VI Officer can be contacted at [OCTC@orangecountygov.com](mailto:OCTC@orangecountygov.com) or by phone at (845) 615-3840.

See [Appendix A](#) for more information on regulations and how OCTC meets the federal guidelines.

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## Part 2: Public Participation Process

The OCTC believes that effective public involvement and participation is a dynamic and ongoing process. The MPO has created a strategy to inform and involve interested parties and stakeholders in Orange County that can be adapted to shifting community need. The following Public Participation Process section provides comprehensive methods for public involvement on all MPO activities as described in **Part 1** of this Plan. This includes a public participation purpose statement and goals, stakeholders, and strategies that address the public outreach component of various MPO projects, programs, activities, and methods for monitoring and evaluating success.



### Purpose Statement

The OCTC is committed to encouraging meaningful and informed public participation that promotes opportunities and resources for all community members and interested stakeholders to confidently participate in the transportation planning process. All goals, objectives, and strategies evaluate equity impacts, and the design and development of OCTC programs and projects are inclusive of all and effectively engage underrepresented populations.

The Public Participation Plan provides a proactive public involvement process that:

- increases awareness and understanding in the transportation planning process;
- offers complete information and timely public notice;
- supports early and continued involvement of all stakeholders;
- and provides opportunities for meaningful involvement and citizen feedback.

## Goals

The MPO strives to provide the public and interested parties with the opportunity for meaningful involvement in the development of its plans and programs. The following goals guide and define the public involvement process:

- Provide accessible and continuing opportunity for involvement and participation in the transportation planning process
- Encourage public involvement through effective outreach strategies
- Coordinate public involvement & consultation processes with federal, state, & local agencies, as applicable, to reach a larger audience and minimize costs and redundancies.
- Incorporate equity into the public involvement process, particularly for populations that are considered underserved and underrepresented.
- Educate and inform the public about transportation planning issues and processes to create a forum that allows for meaningful participation and involvement by citizens and stakeholders.
- Incorporate feedback received from the public for consideration and incorporation, as appropriate, into transportation plans, programs, or projects.

These goals are further defined in [Table 3: OCTC Public Participation Goals](#).

## Stakeholders

As part of the Public Involvement Process, it is the MPO's responsibility to provide interested parties (referred to by the OCTC as stakeholders) with reasonable opportunities to be involved in the transportation planning process, as mandated in [23 CFR 450.210\(a\)](#) and [450.316\(a\)](#). The regulation states that interested parties include citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties.



The OCTC maintains a dynamic list of stakeholders and relies on these stakeholders to not only actively participate in the process, but also values its meaningful partnerships with stakeholders to help facilitate and expand the reach of public participation.

**Table 3: OCTC Public Participation Goals**

Goals	Definition of Goals
<p><b>Provide accessible and continuing opportunity for involvement and participation in the transportation planning process</b></p>	<p>Create a predictable and easy-to-understand process for public involvement that encourages open and meaningful participation.</p> <p>Ensure early public involvement in transportation planning activities and maintain engagement throughout the process.</p> <p>Provide timely notice for the public to review and comment on major plans, programs, and activities.</p> <p>Provide reasonable public access through multiple platforms to information in formats and languages that are clear, concise, and understandable.</p> <p>Consider accessibility, time and location when scheduling in-person public input opportunities.</p> <p>Provide information that enables participants to clearly understand the respective proposal, plan, or project.</p> <p>Ensure that all decisions made are documented clearly and shared publicly, if necessary.</p> <p>Routinely evaluate the process to monitor the effectiveness of the methods used to involve the public in the transportation planning process, and make changes as needed.</p>
<p><b>Encourage public involvement through effective outreach strategies</b></p>	<p>Provide a variety of ways to become involved.</p> <p>Make use of graphics and visualization techniques to enhance understanding.</p> <p>Allow flexibility and resilience of the process to adapt to social, economic, and environmental changes.</p> <p>Remain open to using new strategies and technologies for meaningful interaction and communication.</p>
<p><b>Coordinate public involvement &amp; consultation processes with federal, state, &amp; local agencies, as applicable, to reach a larger audience and minimize costs and redundancies.</b></p>	<p>Engage government representatives and partner agencies to create a culture of collaboration that encourages innovation, sharing of resources, and jointly shared accountability for results.</p> <p>Coordinate with other local, federal and statewide public involvement processes in order to enhance public consideration of issues, plans and programs.</p> <p>Work collaboratively with agency partners to coordinate project-specific information to stakeholders.</p> <p>Include opportunity for consultation as needed.</p>
<p><b>Incorporate equity into the public involvement process, particularly for populations that are considered underserved and underrepresented.</b></p>	<p>Improve accessibility to the transportation planning process by holding in-person meetings at convenient dates, times, and locations.</p> <p>Use best practices to identify historically disenfranchised and transportation vulnerable people, including minority, low income, disabled, limited-English proficiency, elderly, and zero-car households.</p> <p>Explore creative techniques and technologies to engage hard-to-reach audiences or groups that may be adversely affected by proposed projects and encourage interaction throughout the planning process.</p> <p>Work to actively eliminate barriers to full participation for underserved and underrepresented populations and aim to celebrate and foster ethnic, cultural, economic, and biological diversity.</p>
<p><b>Educate and inform the public about transportation planning issues and processes to create a forum that allows for meaningful participation and involvement by citizens and stakeholders.</b></p>	<p>Encourage all citizens, stakeholders, and transportation users to provide input and participate in the planning process.</p> <p>Ensure a proactive planning process by providing full and open access to the OCTC through utilization of multiple information sharing resources and platforms.</p> <p>Ensure stakeholders and other interested parties are provided the opportunity to review and comment on all significant MPO plans, programs, projects and activities. This includes ensuring availability of an opportunity to comment on the OCTC Public Participation Plan prior to its approval.</p>
<p><b>Incorporate feedback received from the public for consideration and incorporation, as appropriate, into</b></p>	<p>Respect the information, opinions and comments received during the public engagement process, and incorporate input in the process when reasonable.</p> <p>Document comments received in the public participation process for project, plans, and programs. Share comments with implementing agencies for their consideration to help build public support for a project, as needed, and make available online.</p>

**transportation plans, programs, or projects.**

Continue to evolve and include new avenues of communication to inform the MPO's public outreach initiatives.

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## Diversity & Inclusiveness

OCTC is committed to equity in the transportation planning process and believes all should have input and benefit from transportation investments. Equity goes beyond providing everyone with the same opportunity for public involvement and recognizes that some people have different needs in order to have the same opportunity for engagement as others. The OCTC incorporates equity into the public participation process by (1) making sure diverse and protected classes are not discriminated against, and (2) by creating an environment of inclusivity, especially for traditionally underserved and transportation vulnerable populations to participate in the transportation planning process. The OCTC will make special outreach efforts to ensure inclusion of historically disenfranchised communities.



**Figure 1: Visualizing Equity - One Size Does Not Fit All Infographic**  
CREATED BY THE ROBERT WOOD JOHNSON FOUNDATION

The OCTC recognizes that in order to have an equitable outreach process, an environment of inclusivity must be created. Part of implementing that process means recognizing the barriers to public involvement. Based on previous outreach experience, the OCTC recognizes the need to seek diverse and fair representation, increase public understanding of the OCTC and its role in the present and future transportation network, and continue to foster public trust in the transportation planning process. The OCTC will work with stakeholders to develop relationships in communities where barriers are identified and will seek to build meaningful community partnerships that will help build trust in the MPO and the transportation planning process.

As part of the Public Participation Plan, “Hard-to-Reach” populations have been identified and [Strategies for Involving Hard-to-Reach Communities](#) were created in collaboration with representatives of different hard-to-reach communities to target outreach and encourage participation. These Hard-to-Reach populations are identified in two groups: (1) Traditionally Underserved, or groups that are defined by federal legislation as protected classes, and (2) Transportation Vulnerable, or populations who can be adversely affected by transportation decisions.

**Table 4: Strategies for Involving Hard-to-Reach Communities**

Indicator	Barriers	Strategies
<b>Traditionally Underserved</b>		
<p><b>Minority</b> Individuals that identify racially as Black or African American, Asian, Native Hawaiian or Pacific Islander, Native American, Other, or Two of More Races. Hispanic or Latino is not considered a race in the American Community Survey (ACS).</p>	<ul style="list-style-type: none"> <li>Historically disenfranchised</li> <li>Limited trust in transportation process and government agencies</li> </ul>	<ul style="list-style-type: none"> <li>Peer-to-Peer Workshops: engage community leaders, groups and businesses that have established trust with community</li> <li>Hold public involvement activities at non-governmental institutions (library, community center, local business, etc.)</li> <li>Embed education into the process through surveys and utilize visualization techniques.</li> </ul>
<p><b>Low-Income</b> Households with Income less than 50% of the Median Household Income (MHHI) for the County. The MHHI is approximately \$80,000 in 2019, making the threshold &lt;\$40,000. This definition, versus using poverty level, is a better local determinant of low-income households for the area.</p>	<ul style="list-style-type: none"> <li>Limited time or resources to access and/or participate in meetings or activities</li> <li>Unpredictable work hours</li> <li>Limited access to broadband / computers</li> </ul>	<ul style="list-style-type: none"> <li>Increase access and availability of information through local businesses and community centers</li> <li>Hold public meetings outside of regular work hours or provide basic necessities such as food, water, and childcare assistance at in-person meetings to help remove barriers for attendance</li> <li>Use VPI strategies to extend opportunities online, including mobile content for individuals without home broadband access</li> </ul>
<b>Transportation Vulnerable</b>		
<p><b>Limited-English Proficiency</b> Individuals that speak English “less than very well”.</p>	<ul style="list-style-type: none"> <li>Limited understanding of English language</li> <li>Limited understanding of transportation process</li> </ul>	<ul style="list-style-type: none"> <li>Peer-to-Peer Workshops: engage community leaders, groups and businesses that have established trust with community</li> <li>Offer translation services at in-person and online public involvement activities</li> <li>Share project information for dissemination with multi-lingual media outlets such as newspapers or radio stations</li> <li>Use infographics and other visualization techniques to limit required reading during presentations</li> </ul>
<p><b>Individuals with Disabilities</b> Disabled individuals, including sight, hearing, mobility, and cognitive disabilities.</p>	<ul style="list-style-type: none"> <li>Limited mobility</li> <li>Ability to access meetings or materials may be limited without assistance</li> </ul>	<ul style="list-style-type: none"> <li>Increase accessibility by offering Americans with Disabilities Act (ADA) accessible meetings, meeting locations and documents.</li> <li>Use VPI strategies to extend opportunities online and provided closed captioning and/or sign language services</li> <li>Utilize easy to understand language and limit length and complexity of public meetings</li> </ul>

Indicator	Barriers	Strategies
<b>Age 65+</b> Individuals 65 years or older	<ul style="list-style-type: none"> <li>• Limited mobility</li> <li>• Limited understanding or use of technology</li> </ul>	<ul style="list-style-type: none"> <li>• Provide supplemental strategies when using technology</li> <li>• Work with local Senior Centers or hold events during senior hours to target Elderly population</li> <li>• Use infographics and other visualization techniques to limit required reading during presentations</li> </ul>
<b>Zero Car Households</b> <b>Households that report access to Zero cars. Often used as a metric for transit-reliant households.</b>	<ul style="list-style-type: none"> <li>• Limited accessibility</li> <li>• Multi-modal transportation reliant</li> </ul>	<ul style="list-style-type: none"> <li>• Increase accessibility to meetings and materials by holding meetings near transit services</li> <li>• Use VPI strategies to extend opportunities online, including mobile content</li> <li>• Offer alternative access to in-person meetings including call-in options</li> </ul>
<b>Educational Attainment Less than High School</b> Individuals with an Educational Attainment of Less than High School. This does not include individuals with greater than or equal to a High School diploma or the equivalent (GED).	<ul style="list-style-type: none"> <li>• Limited understanding of the transportation planning process</li> <li>• Literacy may be lower than 8<sup>th</sup> grade level</li> </ul>	<ul style="list-style-type: none"> <li>• Use plain language and visualization techniques to help individuals understand transportation issues or upcoming projects and programs.</li> <li>• Use infographics and other visualization techniques to limit required reading during presentations</li> <li>• Utilize easy to understand language and limit length and complexity of public meetings</li> </ul>

The MPO uses census data and mapping tools and techniques to locate specific (census tract level) areas within Orange County that have populations of the Hard-to-Reach population indicators above the County average. These maps are found in [Appendix B: Maps of Community Demographics](#) and can be referenced when considering outreach strategies across different communities in Orange County. The OCTC will update the Maps of Community Demographics as data becomes available.

## Strategies for Outreach

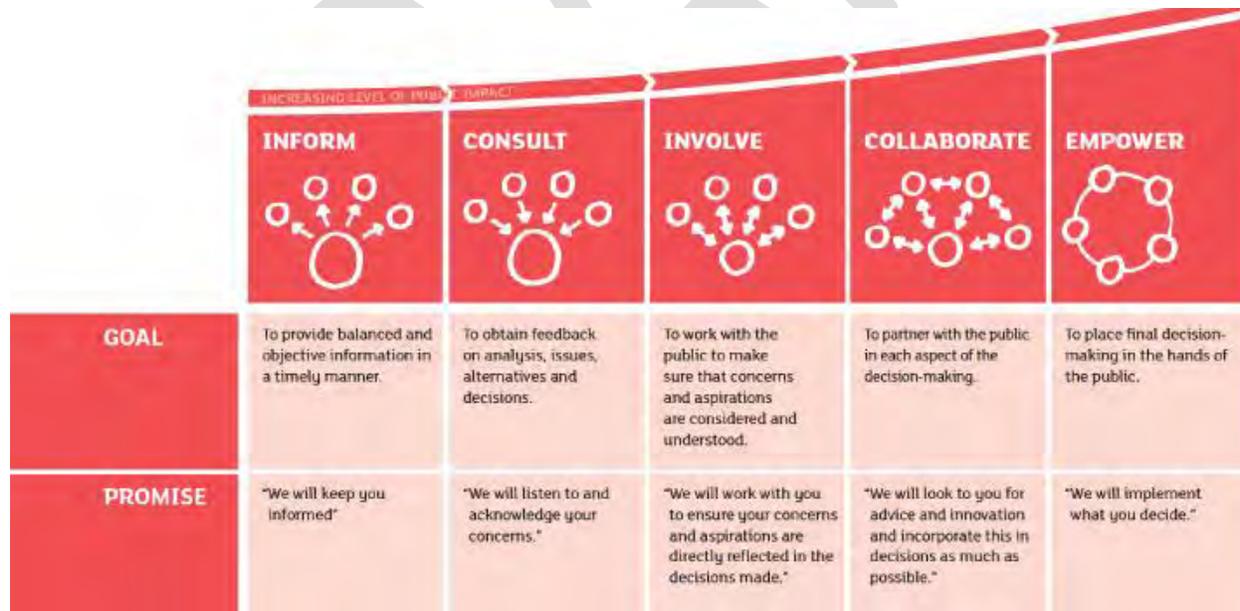
Public Participation is not a one-size-fits-all model. A key part of developing an effective public involvement process is assembling a variety of techniques to meet the needs of a given transportation plan, program, or project. Current Federal statutes and regulations provide general guidelines for locally developed public involvement processes and procedures. There is also a significant flexibility awarded to transportation agencies in developing specific public involvement programs. As a result, the OCTC has developed the *Outreach Toolbox* to encourage right-sizing public outreach strategies to best fit the goals of public participation.

### Outreach Toolbox

The OCTC Outreach Toolbox is a mix of strategies that help address the public outreach component of various MPO projects, programs, and activities. The toolbox incorporates a process for finding suitable strategies based on the goals of outreach, the target audience, the geographic scale, and identifying any anticipated barriers to participation. Once these different elements are considered, strategies can be selected by either the intended level of the public's impact or by the technique used to meet the needs of the project or effort.

### Identifying Goals for Outreach

The IAP2's *Spectrum of Public Participation* is an internationally recognized approach to public engagement and is used widely to guide the public participation process. It is designed to assist with the selection of the level of participation that defines the public's role in any public participation process. The public's impact on decision making increases from left to right. The *Spectrum of Public Participation* is a comprehensive approach to understanding specific goals and objectives for public participation; it has been integrated with the Outreach Strategies in [Table 4: Strategies for Public Participation](#) as a guide to help identify the best fit strategy for public engagement based on the outreach goal and promise to the public.



**Figure 2: IAP2's Spectrum for Public Participation**

### Geographic Scale

The community demographics and scale of the project will also affect the overall success of a strategy and should be considered when identifying the best-fit-tool for engagement. Both projects that have an extensive geographic boundary and projects which are smaller and more localized will benefit from strategies that use Virtual Public

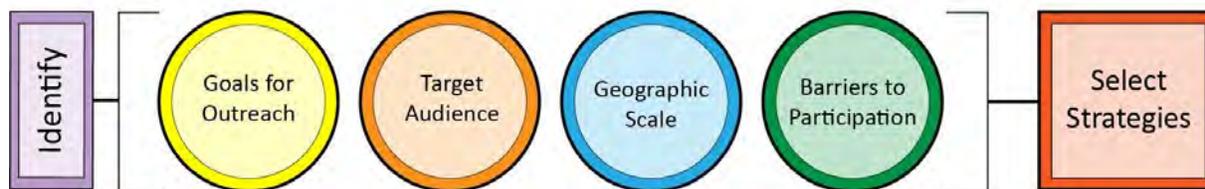
Involvement (VPI) tools. VPI expands outreach and engagement from traditional in-person only events and allows those who might otherwise have an issue, conflict, or unease about attending to participate. While VPI is a great tool, in-person strategies that bring participation opportunities to people are invaluable to the outreach process. Tools like pop-up events allow individuals to have meaningful conversations about issues or impacts face-to-face with the project team and are beneficial for more localized projects.

### *Target Audience*

When selecting strategies, it is important to identify the intended audience. Are partner agencies or municipal leaders the target? Local businesses in a community? Transit riders? Users of a certain facility? Not all individuals use the same platforms for communication or have the same level of comfort with formal meetings or activities. Forming a strategy around who the target audience is can help limit unintended barriers and increase public participation.

### *Barriers to Public Participation*

Barriers to public participation are not limited to traditionally disenfranchised or transportation vulnerable populations, however, the OCTC recognizes there are systemic barriers for hard-to-reach populations and identifies strategies to assist in overcoming them in in [Maps of Community Demographics](#) and [Strategies for Involving Hard-to-Reach Communities](#). Barriers to attending a public meeting could range from scheduling conflicts, transportation limitations, lack of childcare, unease with the meeting space itself, or discomfort in sharing their comments in a formal meeting setting. Barriers may not become apparent until after the public outreach process begins, which is why it is important to monitor and evaluate strategies.



**Figure 3: Strategies Selection Process**

### **List of Strategies**

The following section is a comprehensive list of strategies for the public involvement process. The strategies are broken into four techniques: Core Techniques to Inform, In-Person Techniques for Involvement and Feedback, In-Person Community Outreach Techniques to Enhance Participation, and Special Techniques to Enhance Participation, as well as listed by Public Participation Goal (Table 5).

Strategies can be used alone, or multiple strategies can be applied to an outreach effort. Some strategies may encourage different types of engagement based on how they are applied.

**Table 5: Strategies by Public Participation Goal**

	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
STRATEGIES	<ul style="list-style-type: none"> <li>• Contact List</li> <li>• MPO Website</li> <li>• Notices</li> <li>• Project-Specific Websites</li> <li>• Public Hearings</li> <li>• Public Meetings</li> <li>• Pop-up Events</li> <li>• Social Media</li> <li>• Newsletter</li> <li>• Interactive Mapping</li> <li>• Visualizations</li> <li>• Transit Advertisements</li> <li>• Videos &amp; PSAs</li> </ul>	<ul style="list-style-type: none"> <li>• Project-specific websites</li> <li>• Public Workshop or Open House</li> <li>• Public Hearings</li> <li>• Partner Agency Coordination</li> <li>• Stakeholder/ Focus Group</li> <li>• Public Meetings</li> <li>• Surveys &amp; Live Polling</li> <li>• Meeting-in-a-box</li> <li>• Pop-up Events</li> <li>• Charrettes</li> </ul>	<ul style="list-style-type: none"> <li>• Project-specific websites</li> <li>• Stakeholder/ Focus Group</li> <li>• Steering/ Technical Committees</li> <li>• Public Workshop or Open House</li> <li>• Public Meetings</li> <li>• Crowdsourcing</li> </ul>	<ul style="list-style-type: none"> <li>• Partner Agency Coordination</li> <li>• Steering/ Technical Committees</li> </ul>	<ul style="list-style-type: none"> <li>• Charrettes</li> </ul>

**Core Techniques to Inform**

The OCTC uses four main outreach strategies to share MPO activities. The contact list is an ongoing list of media, OCTC members, partner agencies, interested parties, and individuals that request to be added to the list. All opportunities for public comment are sent via email to the contact list, posted as an OCTC Notice, and updated on the MPO website or project-specific website, as needed.

**Contact List**

The contact list will be utilized to share important information including meeting information, opportunities for public comment, TIP and LRTP information, and projects and studies. Any individual or agency wishing to be added to the contact list may be asked to provide their address, email, phone number, and/or agency information. The contact list is maintained by staff, in consultation with partner agencies, and updated as needed.

**MPO Website**

All relevant information regarding the metropolitan transportation planning process and program is provided on the MPO’s website. The website includes a translation service and accessibility services and is updated regularly to ensure the latest information is available to local, state, and federal partners, stakeholders, and the public. The website also includes a function where individuals can subscribe to receive OCTC Notices.

**Notices**

Notices are distributed to the Contact List via email, posted on the website, and sent out to website subscribers. Anyone interested in receiving notices via email or SMS can subscribe by signing up on the website.

**Project-Specific Websites**

For individual projects, project-specific websites may be used. These sites are used when project information is too extensive to be included on the MPO site. Project websites can contain study area maps, meeting announcements, descriptions of alternatives, comment forms, user surveys and project team contact information. Links to project sites are provided via the MPO website.

### *In-person Techniques for **Involvement and Feedback***

The OCTC recognizes the importance of in-person strategies to create predictable forums to share timely information, inform the public of ongoing activities, and provide an opportunity for attendees to share feedback. In-person strategies vary based on the type of information being shared, the target audience, the formality of the meeting, and the level of feedback needed. In-person techniques are most often used by the OCTC Planning and Policy Committees to share core work products and to elicit feedback from stakeholders on projects and studies.

#### **Steering/Technical Committees**

Steering or technical committees may be formed to provide insight on a specific study or plan. These committees are comprised of stakeholders, individuals, or experts and are tasked with providing insight into the plan or study.

#### **Public Workshop or Open House**

Public workshops and open houses provide an opportunity for the public and staff to interact one-on-one. This could include a presentation, interactive stations, presentation boards, handouts, or other informal interactions methods.

#### **Public Hearings**

Formal meetings held by OCTC or partner agencies, often for specific projects or special issues. Typically, members of the public are given 2-5 minutes, depending on rules established prior to the comment opportunity, to individually state opinions/positions that are recorded without an immediate response. Comments received as part of a Public Hearing are considered in the overall involvement process and summarized in the final documentation for a project or plan.

#### **Partner Agency Coordination**

MPO staff attends and participates in transportation public participation activities, and partner agencies are invited to coordinate on OCTC activities. The goal of inter-agency coordination is to enhance public consideration of transportation issues, plans, and programs, no matter the jurisdiction, and to reduce redundancies and costs.

#### **Stakeholder/Focus Group**

During specific projects, the MPO may convene a group of experts, individuals, or stakeholders that are representative of interested parties to provide greater insight on a specific plan or study, or to identify user specific priorities and concerns. These individuals are often not part of a steering or technical committee, but offer valuable insight in project development, and are generally sought out outside of general public engagement activities.

#### **Public Meetings**

Public meetings give the public and other interested stakeholders the opportunity to be informed, review, and make comments on the transportation planning process, policies, plans, and other relevant MPO work efforts. Public Meetings include regular OCTC meetings and project-specific meetings. Public meeting announcements and any applicable meeting materials are shared seven days ahead of time with the contact list and on the website.

### *In-person Community Outreach Techniques to Enhance Participation*

In-person community outreach techniques can be used as an activity to compliment in-person meetings or as a standalone strategy to increase involvement in a specific project, program or activity. The following outreach techniques may include the use of new and innovative technologies to enhance participation at in-person meetings.

#### **Pop-up events**

MPO staff may participate in pop-up outreach at heavily trafficked locations and events, including festivals and community events, to reach community members. Pop-up events may be used to share information, education, or as an opportunity to gather public input on an issue or project.

#### **Surveys**

During specific plans and projects, the MPO may conduct a survey to gather local priorities or gauge public opinion. Surveys can be conducted online, in-person, or through hard-copies. Accessible formats, platforms, and translation options will be identified, as needed.

#### **Interactive Mapping & Crowdsourcing**

Maps may be used for specific projects to gather feedback from the public on local priorities and needs, or to present current and future projects in the region. Maps may be available through the OC GIS Portal, Arc Online, OCTC and/or project website, or printed. Interactive mapping can also be used as a tool to solicit crowdsourcing for input, ideas, and suggestions from the public.

#### **Presentations and Graphics (*Visualization Techniques*)**

Visualization techniques to enhance understanding of transportation issues and decisions include but are not limited to the use of PowerPoint presentations, static maps, charts, graphs, renderings, photos, and brochures. Visuals help breakdown complex concepts and materials into easy-to-understand information.

#### **Charrettes**

Charrettes can be used to bring together the public, community leaders, and professionals around a complex design issue and workshop solutions in real time.

### *Special Techniques to Enhance Participation*

Special techniques include efforts to inform, involve, and engage stakeholders beyond in-person outreach strategies. These techniques may include exploring new and innovative platforms to share information and interact with the public. One emerging trend is VPI or all-in-one tools. VPI can help increase convenience, participation, access, and transparency, while also reducing overall cost and staff time. VPI is not only being integrated into the outreach strategies to compliment in-person efforts, but also being considered to enhance accessibility and engagement for OCTC Planning and Policy Committee meetings.

#### **Social Media**

Social Media Accounts (Including but not limited to Instagram, Facebook, and Twitter) are updated regularly as appropriate with relevant MPO projects/plans and transportation related news to keep an active presence online. OCTC currently uses the Orange County Government Facebook page and Instagram as their social media platforms.

#### **Videos**

Videos may be created to promote ongoing plans or studies, to inform and/ or educate the public and stakeholders about planning activities or encourage involvement in MPO plans/projects.

### **Meeting-in-a-Box**

MPO provides necessary materials to allow organizations, businesses, or groups the ability to host their own meetings and collect public comment at their own convenience without MPO Staff present.

### **Newsletter**

MPO staff will create and share informative and accessible writings to help engage community members to understand transportation issues and projects being undertaken by the MPO. These articles will be posted in The Resource, the OC Planning Department Newsletter, an online newsletter posted on the Orange County website, shared via email, and printed upon request. The writings can also be shared to reach targeted groups via email or shareable URLs.

### **Video & Audio Public Service Announcements**

Video/audio public service announcements and campaigns can be used to present information on selected topics or events and distribute them on the OCTC website and to the appropriate area tv, radio, and cable stations.

### **Live Polling**

During specific plans and projects, the MPO may conduct real-time polling using online platforms to gather local priorities or gauge public opinion during meetings and webinars.

### **Transit Advertisements**

Advertising space on any form of public transit and shelters, including but not limited to commuter buses, Transit Orange buses, rail service, and the Beacon-Newburgh Ferry will be used when appropriate to advertise for MPO events or activities, especially ones that impact public transit services.

### **Press Releases & Media Packets**

The MPO creates shareable information to support MPO meetings, programs, and initiatives. The type of content can vary from press releases to shareable graphics sized for different social media platforms, infographics, videos, and sample posts. This content is shared to a media list, via email and social media, as part of media kits, and with local municipalities, partner agencies, and interested organizations to announce upcoming meetings and activities and to provide information on specific MPO issues. The Chairman is the spokesperson of the MPO and will maintain a good relationship with the media.

### **Flyers, Handouts, & Fact Sheets**

Flyers and other handouts may be used to announce upcoming meetings or promote involvement on a current project. Fact sheets are 1-2 pages of consolidated information in plain language to inform the public on projects. All three strategies can be printed or shared online and can be displayed/distributed to public places to reach a larger audience. Information will be provided in both English and Spanish. Other translation services provided as appropriate.

## Monitoring & Evaluation

The Public Participation Plan is an evolving document. The MPO strives to create an open and easy-to-understand process for public involvement. Regular monitoring and evaluation helps to improve the MPO's ability to identify and prioritize effective and successful outreach strategies, identify opportunities to expand or improve, recognize barriers to public involvement, and revise ineffective strategies. The MPO will solicit feedback on the effectiveness of the public involvement process from participants, collaborators, and other stakeholders as part of the process for evaluation. The effectiveness of this public participation plan will be reviewed based on the following criteria:

- The OCTC process is generally perceived by participants to be fair.
- People were heard and respected, particularly during the development of the MPO products and major studies.
- Consensus was reached on major documents.
- Certification reviews reveal no deficiencies.

The OCTC may utilize multiple methods, including monitoring performance measures, analytics, events, and surveys to track the effectiveness of the outreach strategies it uses as part of its public involvement process. These performance measures will include, but are not limited to:

- Number of participants and comments received during review periods.
- Total interactions through informative strategies, including newsletter subscribers, social media interactions on posts, and subscribers to OCTC notices.
- Number of community events participated in, particularly in geographic areas identified to have high rates of hard-to-reach populations.
- Overall socio-economic and demographic data for participants reflects a similar representation of the target community, when available and feasible.

## Update Procedure

This Plan will be updated no less than every five (5) years as part of the continuing, cooperative, and comprehensive transportation planning process, as outlined in [Table 2: Work Products and Procedures](#). The PPP shall be coordinated with ongoing statewide public involvement process, as appropriate. The PPP will be reviewed periodically and updated as needed to include intermediate revisions as regulations, expectations, and/or technology changes. Additionally, the conclusion of major projects, federal certification review, updates to federal transportation legislation, and the adoption of the LRTP, UPWP, and TIP provide natural opportunities to review and revise this Plan.

**Minor modifications** to the PPP include changes to the public involvement tools and strategies, revision of references to applicable regulations, misspellings, omissions or typographical errors. Staff performs these updates, with no notification required. **Amendments** to the PPP include any other changes that do not fit the minor modification definition and require a 45-day public comment period.

For additional information about OCTC or the Public Participation Plan, please visit [orangecountygov.com/octc](http://orangecountygov.com/octc) or email [octc@orangecountygov.com](mailto:octc@orangecountygov.com).

Last updated XX XX, XXX

## Appendix A: Federal and State Regulations

### *New York State Open Meetings Law*

Public Officers Law, Article 7 established the New York State (NYS) Open Meetings Law. The purpose of this law establishes public business be performed in an open and public manner and that the citizens of this state be fully aware of and able to observe the performance of public officials and attend and listen to the deliberations and decisions that go into the making of public policy.

### *Sunshine Act*

The Sunshine Act is a federal statute that outlines requirements for public meetings. It states, "In the case of each meeting, the agency shall make public announcement, at least one week before the meeting, of the time, place, and subject matter of the meeting, whether it is to be open or closed to the public, and the name and phone number of the official designated by the agency to respond to requests for information about the meeting... The agency shall make promptly available to the public, in a place easily accessible to the public, the transcript, electronic recording, or minutes (as required by paragraph (1)) of the discussion of any item on the agenda, or of any item of the testimony of any witness received at the meeting, except for such item or items of such discussion or testimony as the agency determines to contain information which may be withheld under subsection (c).

### *Public Interest*

Based on 23 USC 109 (h) MPOs and Sub-Recipients of federal funding must assure that possible adverse economic, social, and environmental effects relating to any proposed project on any Federal-aid system have been fully considered in developing such project, and that the final decision on the project are made in the best overall public interest, taking into consideration the need for fast, safe and efficient transportation, public services and the costs of eliminating or minimizing such adverse effects and the following: (1) air, noise, and water pollution; (2) destruction or disruption of man-made and natural resources, aesthetic values, community cohesion and the availability of public facilities and services; (3) adverse employment effects, and tax and property values losses; (4) injurious displacement of people, businesses and farming; and (5) disruption of desirable community and regional growth.

### *Public Participation Regulations*

The Federal requirements of an MPO for the Public Participation Plan are defined in 23 United States Code (USC) Section 134 and 23 Code of Federal Regulations (CFR) Part 450. FHWA guidelines say that Metropolitan Planning Organizations (MPOs) shall develop and use a documented participation plan. The plan defines a process for providing stakeholders and other interested parties with reasonable opportunities to be involved in the metropolitan transportation planning process.

The MPO's core functions and participation procedure, as well as the guiding state and federal regulations, lay the foundation for the necessary requirements to create a successful Public Participation Process.

### *Non-Discrimination Legislation*

#### *Title VI*

Title VI of the 1964 Civil Rights Act states 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 otherwise be subject to discrimination under any program or activity that is a recipient of federal financial assistance." Title VI regulations apply to all organizations (government or not-for-profit) that receive federal funds.

Consistent with Title VI of the Civil Rights Act of 1964 and U.S. Department of Transportation (DOT) guidance, OCTC has developed a [Title VI/Non-Discrimination Policy](#), which includes procedures for complaints of discrimination against the MPO. OCTC receives and responds to Title VI complaints as they are filed.

### *Non-Discrimination Statutes*

In addition to Title VI, there are other non-discrimination statutes that afford legal protection based on age, sex, and disability. These statutes include the following: Section 162 (a) of the Federal-Aid Highway Act of 1973 (23 USC 324) (sex), Age Discrimination Act of 1975 (age), and Section 504 of the Rehabilitation Act of 1973/Americans With Disabilities Act of 1990 (disability). Taken together, these requirements define an over-arching Title VI/Nondiscrimination Program. It is important to also understand that Title VI and the additional non-discrimination requirements are applicable to Federal programs in addition to programs receiving federal financial assistance due to the Civil Rights Restoration Act of 1987.

### *Americans With Disabilities Act*

The Americans with Disabilities Act, which became law in 1990, states, "... no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of services, programs, or activities of a public entity, or be subjected to discrimination by any such entity." It is the first comprehensive civil rights law passed by U.S. Congress prohibiting discrimination against people with disabilities in all areas of public life, including but not limited to, employment, government services, public accommodations, commercial facilities, and transportation.

### *Executive Order 13166 (Limited-English-Proficiency)*

On August 11, 2000, President William J. (Bill) Clinton signed Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency." Its purpose is to improve access to federally conducted and federally assisted programs and activities for persons who, as a result of national origin, are limited in their English proficiency. Federal agencies were directed to provide guidance and technical assistance to recipients of federal funds as to how they can provide meaningful access to limited English proficient users of federal programs.

Consistent with Executive Order 13166 and U.S. Department of Transportation (DOT) guidance, OCTC has developed a Limited English Proficiency Plan in order to ensure meaningful input opportunities for persons with limited English proficiency.

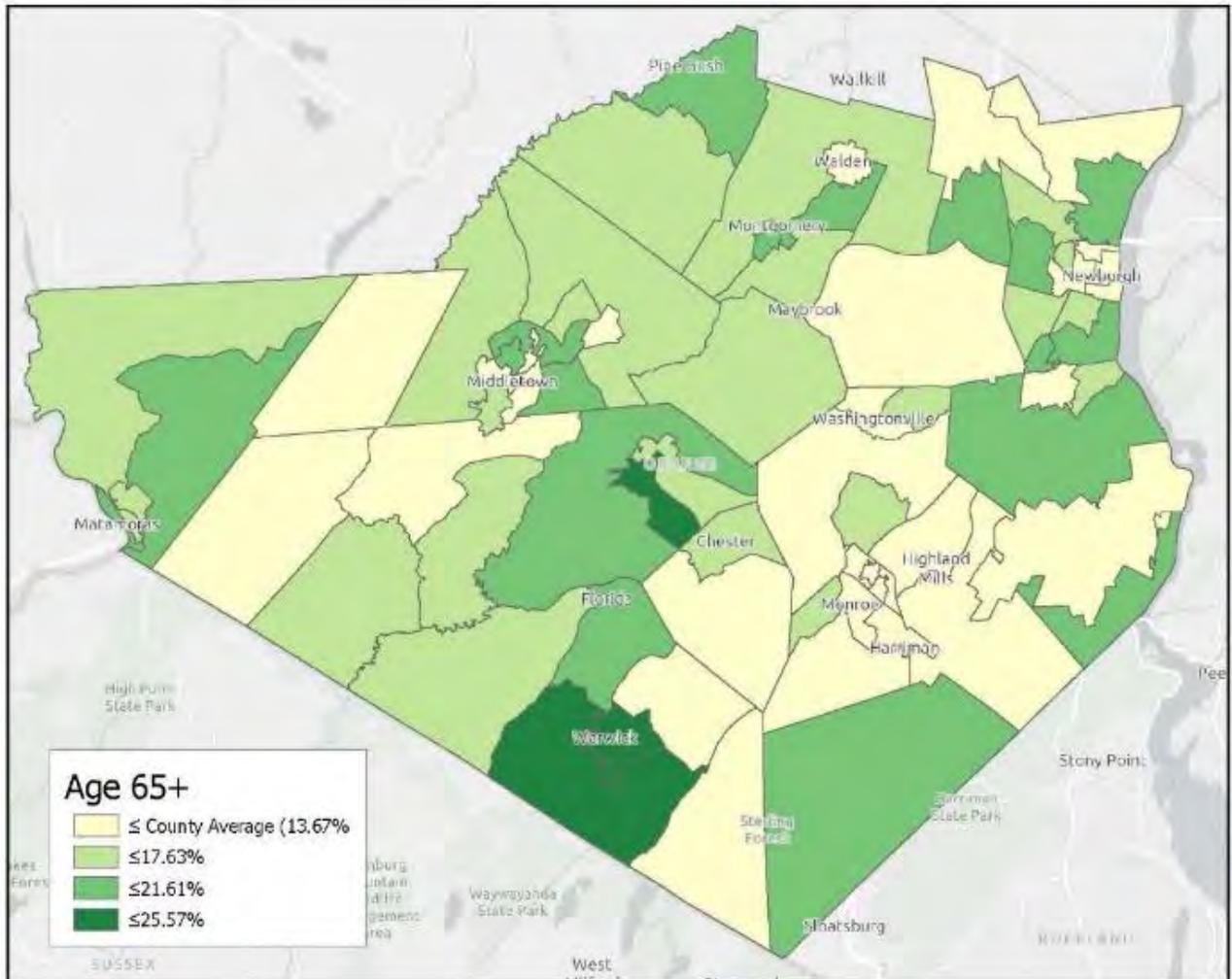
### *Executive Order 12898 (Environmental Justice)*

On February 16, 1994, President William J. Clinton signed Executive Order (E.O.) 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations." Its purpose is to focus federal attention on the environmental and human health effects of federal actions on minority and low-income populations with the goal of achieving environmental protection for all communities.

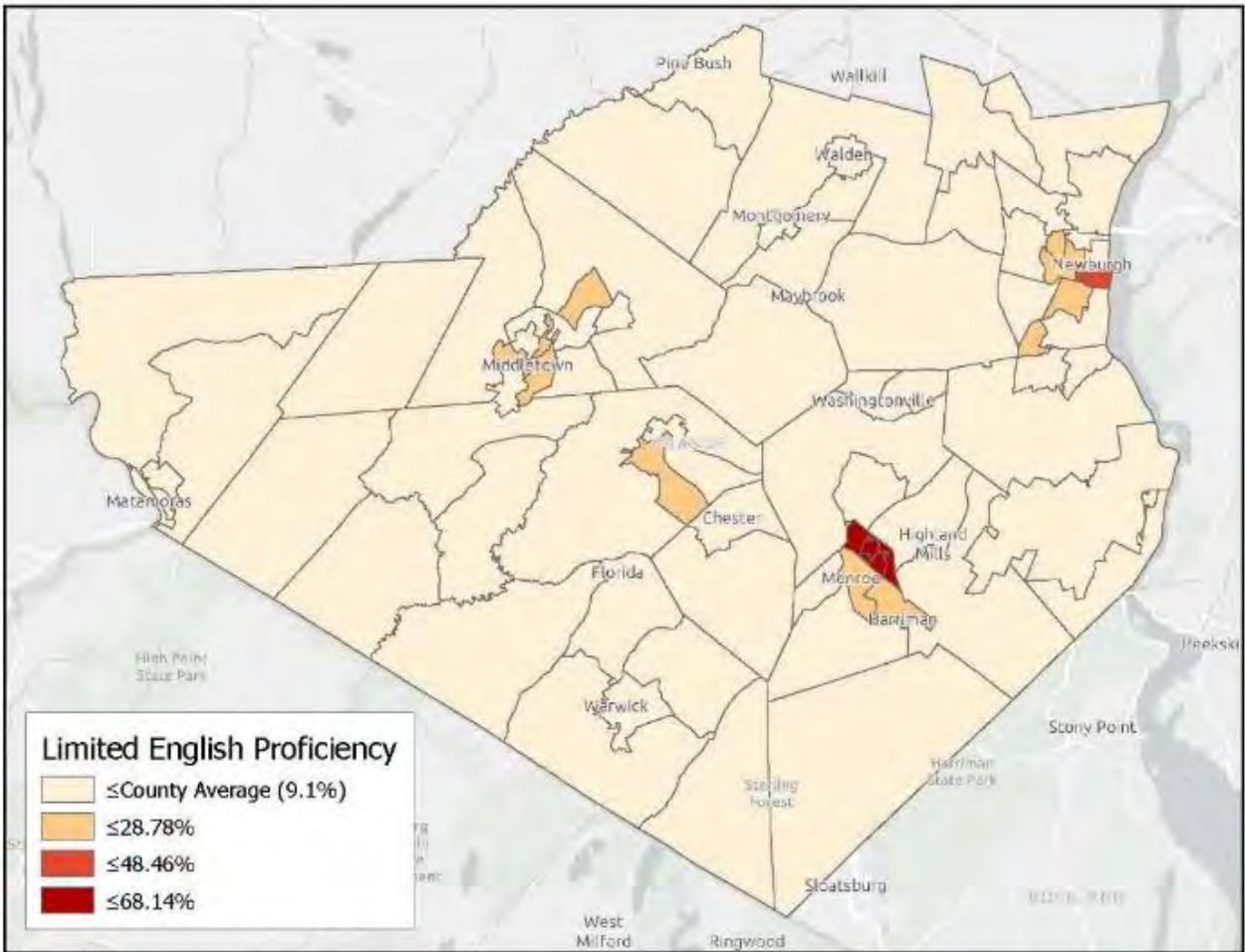
Consistent with Executive Order 12898 and U.S. Department of Transportation (DOT) guidance, OCTC ensures minority and low-income communities are not adversely affected by the transportation planning and programming of projects as part of the Metropolitan Transportation Plan (MTP) and Transportation Improvement Program (TIP).

## Appendix B: Maps of Community Demographics

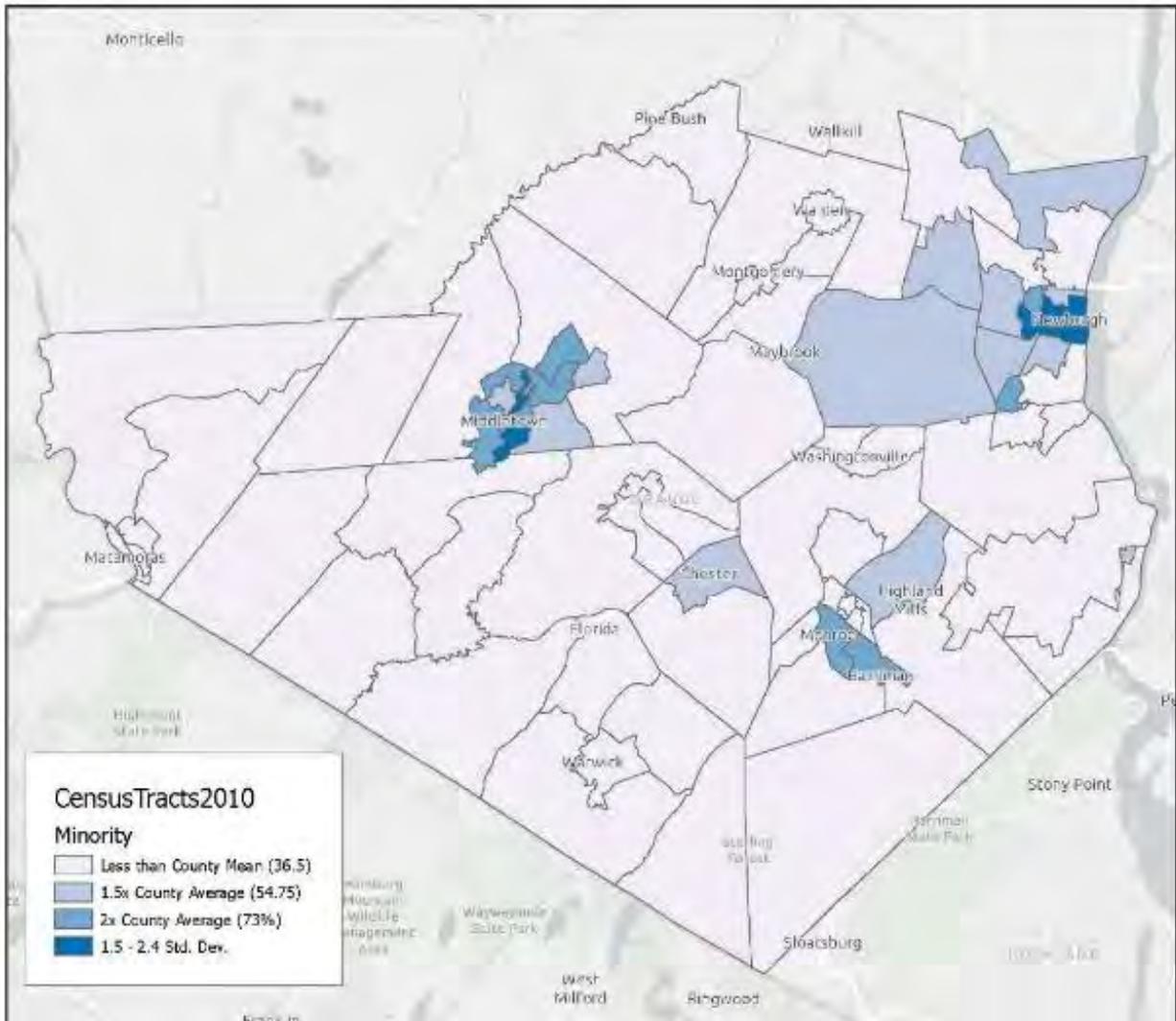
As stated in the [Diversity & Inclusiveness](#) section of the PPP, the OCTC recognizes that in order to have an equitable outreach process, it must create an environment of inclusivity in the transportation planning process. To do this, the OCTC identified “Hard-to-Reach” populations and created *Strategies for Inclusiveness* to help target outreach and encourage participation. These Hard-to-Reach populations are identified in two groups: Traditionally Underserved, or groups that are defined by federal legislation as protected classes, and Transportation Vulnerable, or populations who can be adversely affected by transportation decisions. More information on the definitions of each indicator can be found in [Appendix B: Strategies for Involving Hard-to-Reach Populations](#).



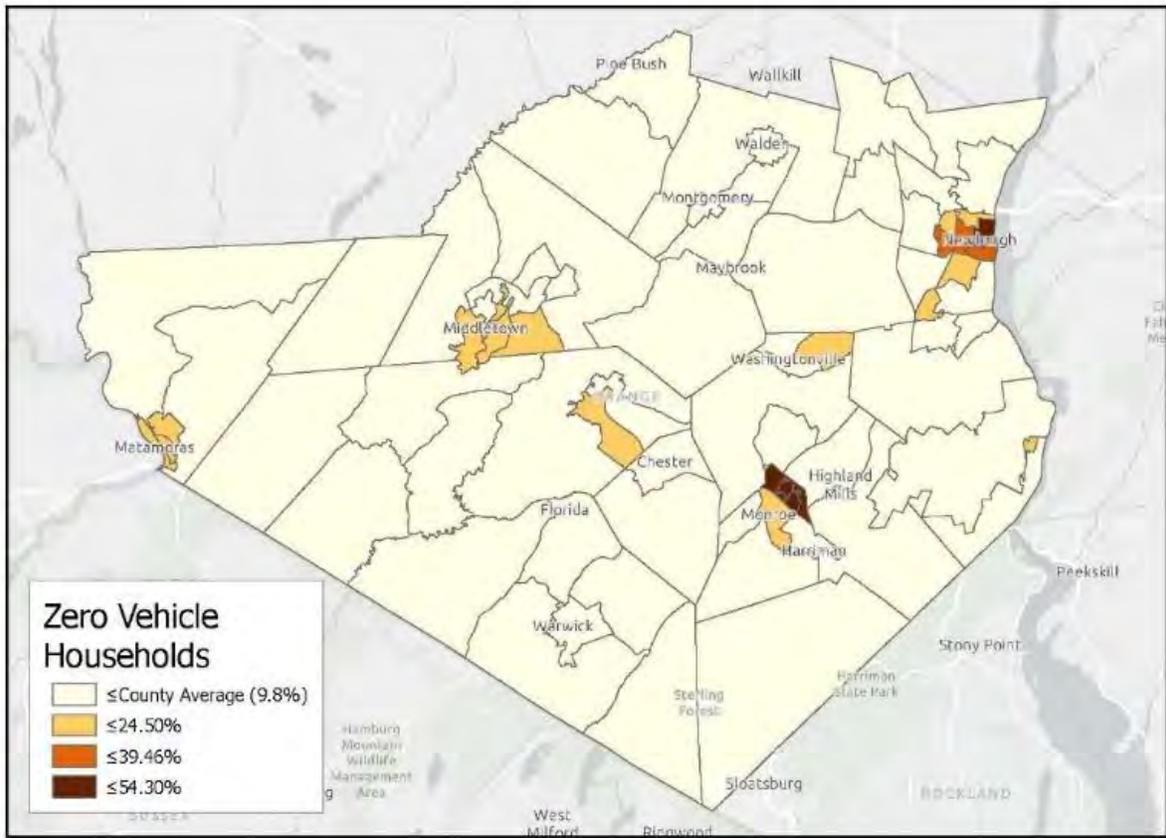






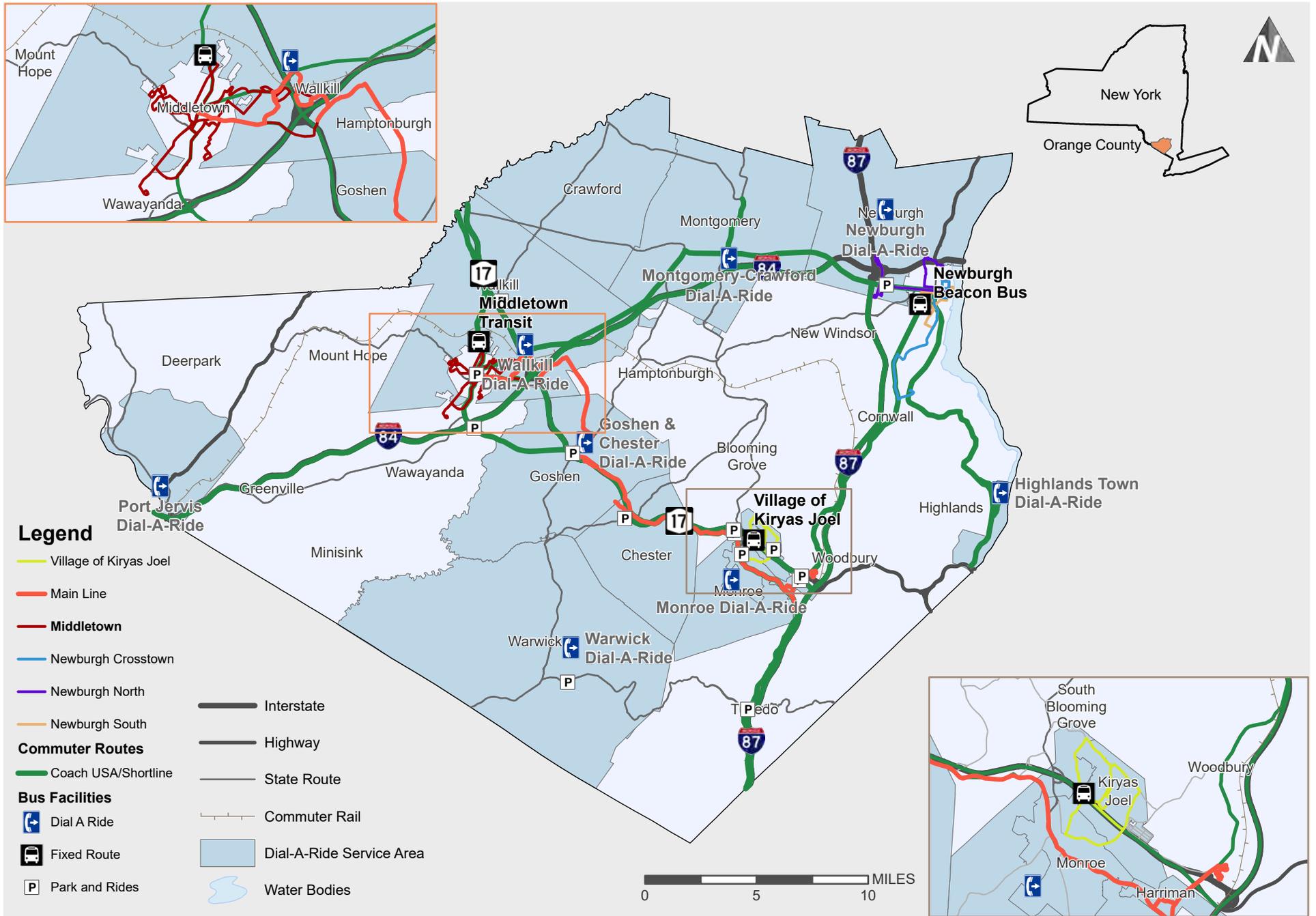






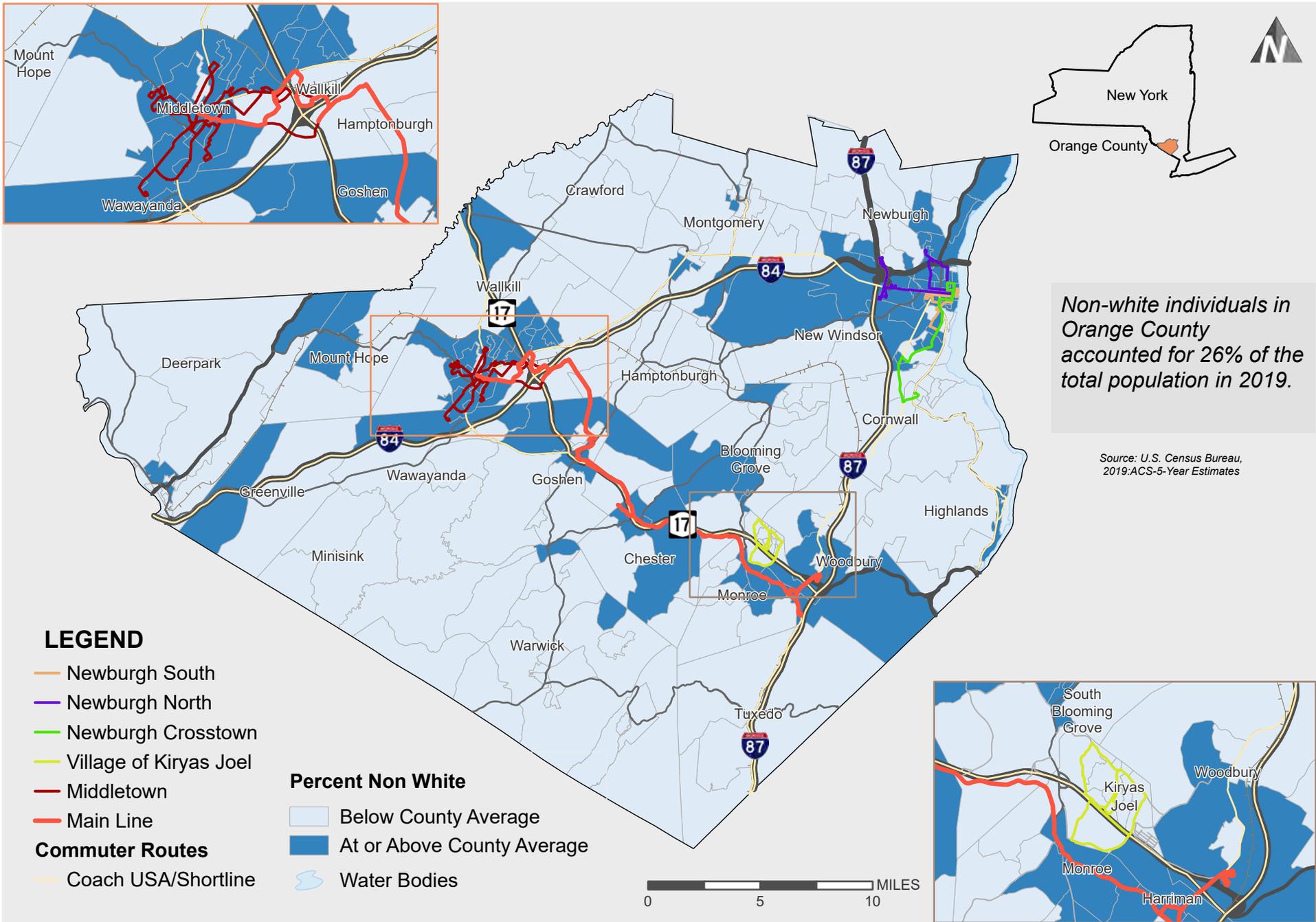
DRY

# **Attachment F1: Transit Basemap**



 **Orange County Transit Basemap**  
Orange County Title VI

# **Attachment F2: Minority Population by Census Block Groups with Bus Routes**

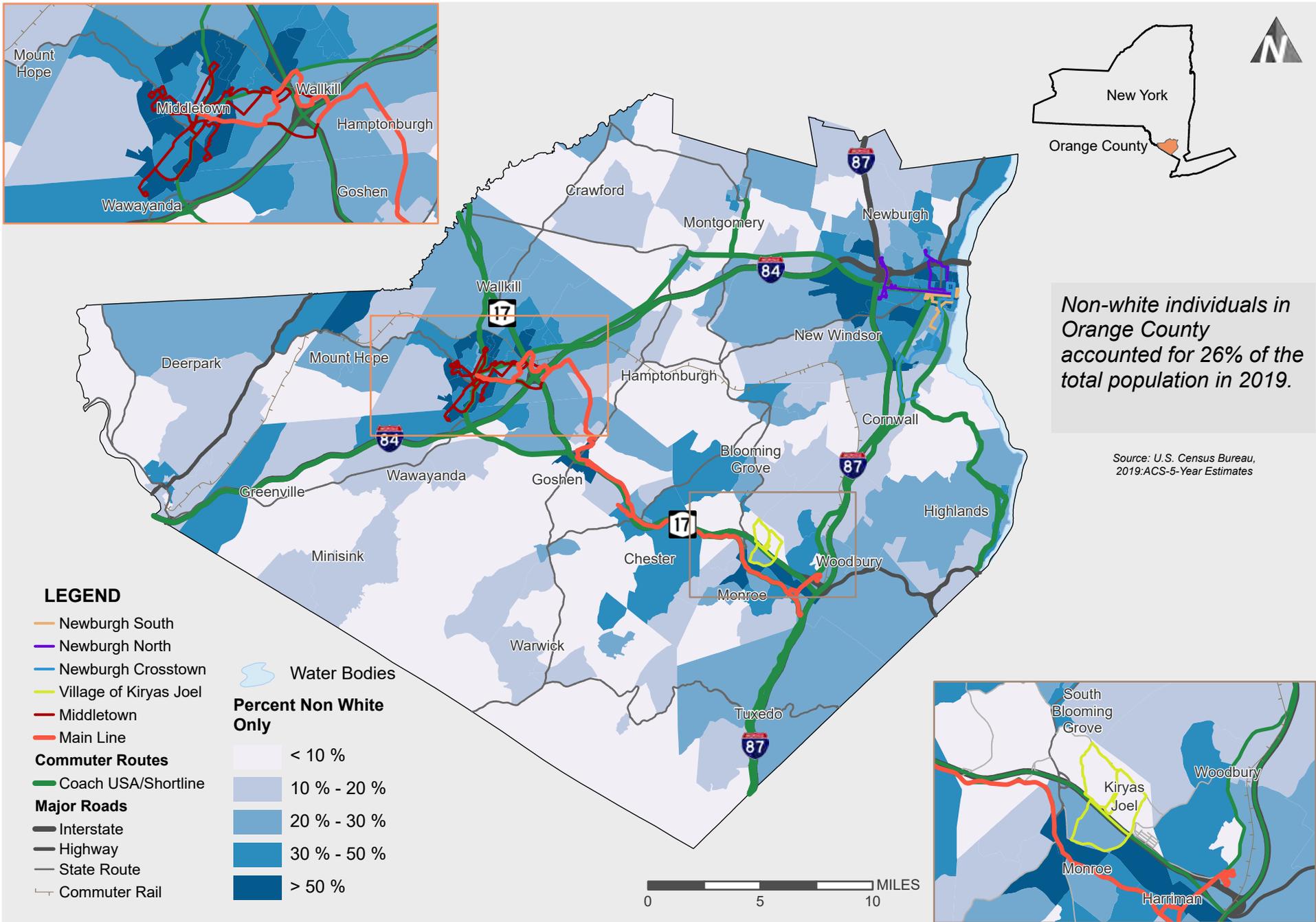


Orange County Average Non-White Population by Census Block Group with Transit Services

FIGURE

Orange County Title VI

F-2



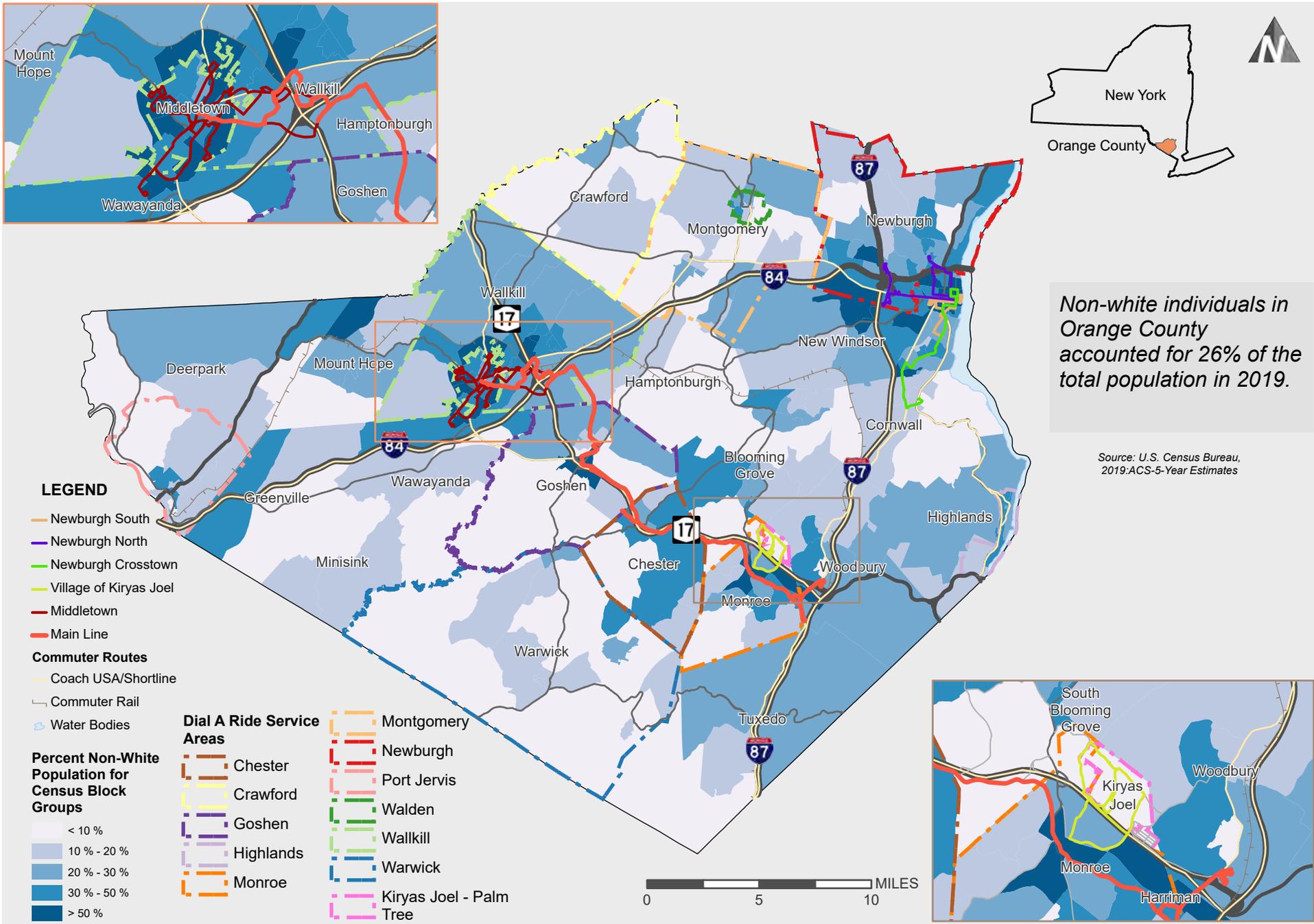
# Orange County Percent Non-White by Census Block Group with Bus Routes

Orange County Title VI

FIGURE

F-3

# **Attachment F4: Minority Population as a Percentage of Total Population**



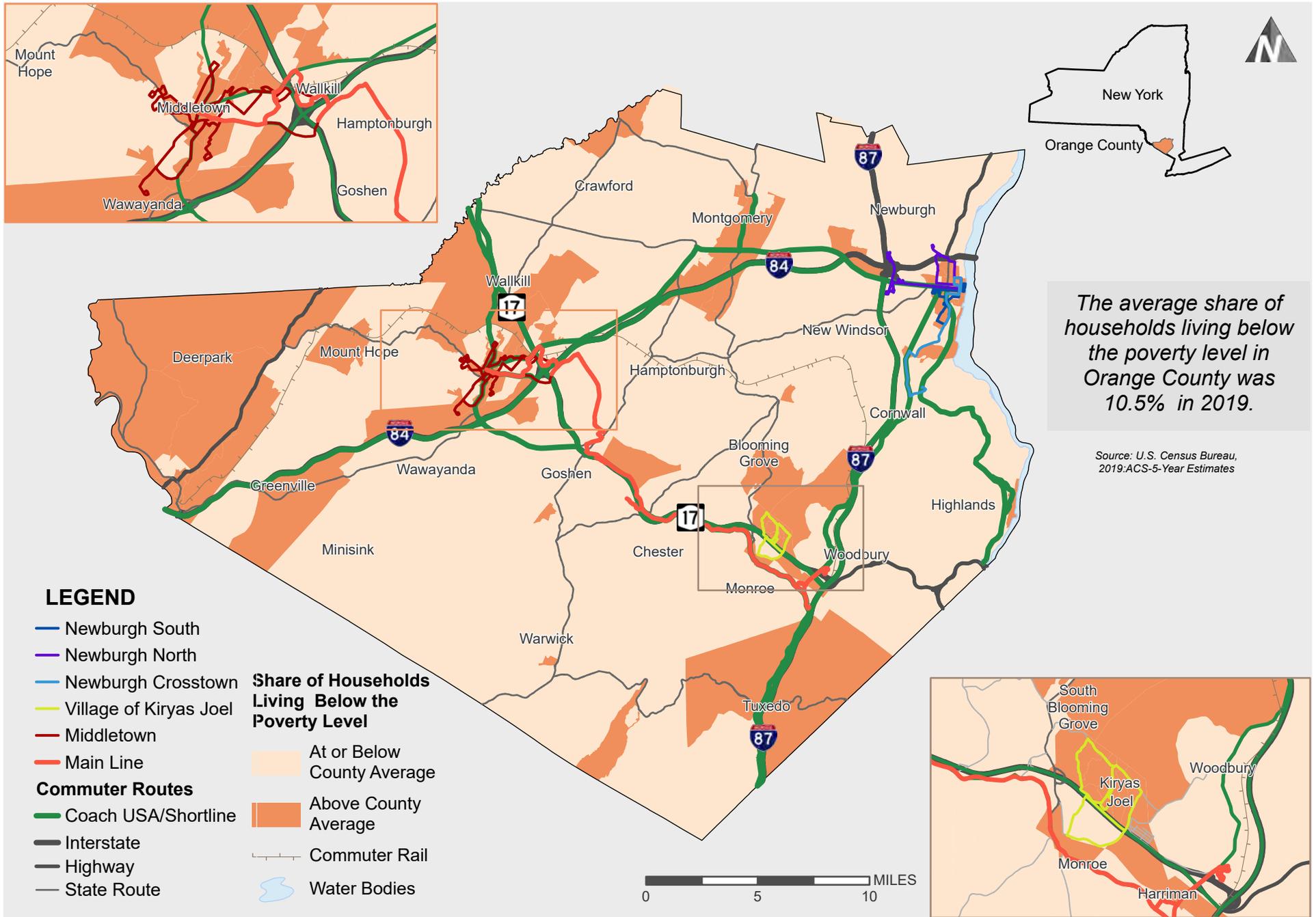
Orange County Percent Non-White by Census Block Group with Transit Services

Orange County Title VI

FIGURE

F-4

# **Attachment F5: Population by Census Block Groups Living Below Poverty Level**



Orange County Households Living Below the Poverty Level By Census Block Group **FIGURE**

Orange County Title VI

**F-5**

# **Attachment G1: Fixed Transit Bus Roster**

PART III. TRANSIT BUS VEHICLE ROSTER AND REPLACEMENT SCHEDULE

Name of Applicant - County of Orange  
 Name of Transit Operator - Orange County Public Transportation System  
 Statistics as of dates noted

All vehicles listed are titled to the County of Orange  
 For any buses purchased with Federal Section 5307, 5309, or 5311 funds the funding was 80% Federal, 10% State, 10% Local  
 For any buses purchased with Federal ARRA funds the funding was 100% Federal

Date Roster Updated - 5/6/2021  
 Name and Telephone Number of Person Completing Roster - Rob Parrington 845-615-3852

Lessee (Operator)	Official Fleet Size	Vehicle Make	Year	License Number	County Inventory Tag No.	Operator's ID No.	Chassis Serial Number	Date Delivered to Original Operator	Original Purchase Price	Chassis Serial Number of Bus Replaced	Type of Service	Seats	WC Seats	Fuel Type	Condition Reported By Operator	Date Condition Reported	Mileage	Date Mileage Recorded	Source of Funds	State Funds Used?	Local Funds Source	Date Vehicle Placed in Service	Useful Life	Year Replaced	Year Die	NYS DOT PIN	State Contract Number	Federal Grant No.	County Proj. No.			
Hudson Transit Lines 66 Tetz Road Chester, NY 10918	29	Gillig	2007	514848A	C1665	70491	15GCB211571112586	03/26/07	\$301,665	n/a - addition to fleet	FR	36	2	D	Good	02/20/18	555,239	02/20/18	Sec. 5307	Yes	Oper.	03/26/07	12 years	2019	2019	8792.49.403	C003693	NY-90-X512				
		Gillig	2007	514858A	C2027	70492	15GCB211771112587	03/26/07	\$301,665	n/a - addition to fleet	FR	36	2	D	Good	02/20/18	545,467	02/20/18	Sec. 5307	Yes	Oper.	03/26/07	12 years	2019	2019	8792.49.403	C003693	NY-90-X512				
		MCI D4500	2005	393138A	C0349	70401	1M8PDMFA89P056535	01/28/05	\$441,503	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	860,355	02/20/18	SDF	Yes	Oper.	01/28/05	12 years	2017	2017	8TR4.01.001	K006576	n/a	11004818115			
		MCI D4500	2005	393148A	C0350	70402	1M8PDMFA89P056536	01/28/05	\$441,503	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	781,757	02/20/18	SDF	Yes	Oper.	01/28/05	12 years	2017	2017	8TR4.01.001	K006576	n/a	11004818115			
		MCI D4500	2005	393168A	C0351	70403	1M8PDMFA15P056537	01/28/05	\$441,503	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	795,302	02/20/18	SDF	Yes	Oper.	01/28/05	12 years	2017	2017	8TR4.01.001	K006576	n/a	11004818115			
		MCI D4500	2005	473328A	C0940	70404	1M8PDMFA66P057037	12/19/05	\$422,167	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	881,113	02/20/18	Sec. 5309	Yes	Oper.	12/19/05	12 years	2017	2017	8TR0.29.00	K006576	NY-03-0423				
		MCI D4500	2005	473318A	C0941	70405	1M8PDMFA66P057038	12/19/05	\$422,167	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	865,605	02/20/18	Sec. 5309	Yes	Oper.	12/19/05	12 years	2017	2017	8TR0.29.00	K006576	NY-03-0423				
		MCI D4500	2008	515028A		70406	1M8PDMHA48P057989	07/15/07	\$490,150	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	542,434	02/20/18	Sec. 5309	Yes	Oper.	07/15/07	12 years	2019	2019	8TR0.29.00	K006576	NY-03-0432				
		MCI D4500	2008	515008A		70407	1M8PDMHA08P057990	07/15/07	\$490,150	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	580,879	02/20/18	Sec. 5309	Yes	Oper.	07/15/07	12 years	2019	2019	8TR0.29.00	K006576	NY-03-0432				
		MCI D4500	2008	550818A		70409	1M8PDMHA28P057992	07/15/07	\$490,150	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	726,525	02/20/18	Sec. 5309	Yes	Oper.	07/15/07	12 years	2019	2019	8TR0.29.00	K006576	NY-03-0432				
		MCI D4500	2008	515018A		70410	1M8PDMHA28P057993	07/15/07	\$490,150	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	633,822	02/20/18	Sec. 5309	Yes	Oper.	07/15/07	12 years	2019	2019	8TR0.29.00	K006576	NY-03-0432				
		MCI D4500	2008	551028A		70411	1M8PDMHA28P057994	07/15/07	\$490,150	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	643,506	02/20/18	Sec. 5307	Yes	Oper.	07/15/07	12 years	2019	2019	8TR0.29.00	K006576	NY-90-X561				
		MCI D4500	2008	550868A		70412	1M8PDMHA28P057995	07/15/07	\$490,150	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	710,722	02/20/18	Sec. 5307	Yes	Oper.	07/15/07	12 years	2019	2019	8TR0.29.00	K006576	NY-90-X561				
		MCI D4500	2008	550838A		70413	1M8PDMHA28P057996	07/15/07	\$490,150	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	736,177	02/20/18	Sec. 5307	Yes	Oper.	07/15/07	12 years	2019	2019	8TR0.29.00	K006576	NY-90-X561				
		MCI D4500	2008	515038A		70414	1M8PDMHA28P057997	07/15/07	\$490,150	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	793,994	02/20/18	Sec. 5307	Yes	Oper.	07/15/07	12 years	2019	2019	8TR0.29.00	K006576	NY-90-X561				
		MCI D4500	2008	550828A		70416	1M8PDMHA28P057999	07/15/07	\$490,150	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	717,755	02/20/18	Sec. 5307	Yes	Oper.	07/15/07	12 years	2019	2019	8TR0.29.00	K006576	NY-90-X561				
		MCI D4500	2008	515058A		70417	1M8PDMHA28P058100	07/15/07	\$490,150	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	625,302	02/20/18	Sec. 5307	Yes	Oper.	07/15/07	12 years	2019	2019	8TR0.29.00	K006576	NY-90-X561				
		MCI D4500	2008	515048A		70418	1M8PDMHA28P058101	07/15/07	\$490,150	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	781,161	02/20/18	Sec. 5307	Yes	Oper.	07/15/07	12 years	2019	2019	8TR0.29.00	K006576	NY-90-X561				
		MCI D4500	2008	550888A		70419	1M8PDMHA28P058102	07/15/07	\$490,150	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	761,441	02/20/18	Sec. 5307	Yes	Oper.	07/15/07	12 years	2019	2019	8TR0.29.00	K006576	NY-90-X561				
		MCI D4500	2008	551008A		70420	1M8PDMHA28P058103	07/15/07	\$490,150	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	689,925	02/20/18	Sec. 5307	Yes	Oper.	07/15/07	12 years	2019	2019	8TR0.29.00	K006576	NY-90-X561				
		MCI D4500	2008	551018A		70421	1M8PDMHA28P058104	07/15/07	\$490,150	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	659,728	02/20/18	Sec. 5307	Yes	Oper.	07/15/07	12 years	2019	2019	8TR0.29.00	K006576	NY-90-X561				
		MCI D4500	2008	550848A		70422	1M8PDMHA28P058105	07/15/07	\$490,150	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	793,908	02/20/18	Sec. 5307	Yes	Oper.	07/15/07	12 years	2019	2019	8TR0.29.00	K006576	NY-90-X561				
		MCI D4500	2008	550858A		70423	1M8PDMHA28P058106	07/15/07	\$490,150	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	768,248	02/20/18	SDF	Yes	n/a	07/15/07	12 years	2019	2019	8TR0.29.00	K006576	n/a				
		MCI D4500	2008	551038A		70424	1M8PDMHA28P058107	07/15/07	\$490,150	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	676,898	02/20/18	SDF	Yes	n/a	07/15/07	12 years	2019	2019	8TR0.29.00	K006576	n/a				
		MCI D4500	2008	550898A		70425	1M8PDMHA28P058108	07/15/07	\$490,150	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	688,893	02/20/18	SDF	Yes	n/a	07/15/07	12 years	2019	2019	8TR0.29.00	K006576	n/a				
		MCI D4500	2009	634828A		70426	1M8PDMHA28P059088	08/13/09	\$490,150	n/a - addition to fleet	FR	55	2	D	Good	02/20/18	659,053	02/20/18	Sec. 5307	Yes	Oper.	08/13/09	12 years	2021	2021	8TR0.29.00	K006576	NY-90-X561				
		Gillig	2013	247278B	D1062	901	15GGE3018D1092543	6/17/2013	5575,291	17TKL282321110048	FR	28	2	HD	Good	02/20/18	207,572	12/31/20	ARRA	No	n/a	06/17/13	12 years	2025	n/a	n/a	NY-96-X014	CP401				
		Gillig	2013	247288B	D1063	902	15GGE301XD1092544	6/17/2013	5575,291	17TKL282321110048	FR	28	2	HD	Good	02/20/18	219,545	12/31/20	ARRA	No	n/a	06/17/13	12 years	2025	n/a	n/a	NY-96-X014	CP401				
		Gillig	2013	247298B	D1064	903	15GGE301D1092545	6/17/2013	5575,291	17TKL282121110047	FR	28	2	HD	Good	02/20/18	197,741	12/31/20	ARRA	No	n/a	06/17/13	12 years	2025	n/a	n/a	NY-96-X014	CP401				
Kiryas Joel Village 500 Forest Road Monroe, NY 10949	6	Gillig	2013	R37963	D1057	21	15GGE3014D1092538	06/27/13	5575,291	17TKL2E2631131988	FR	28	2	HD	Excellent	06/27/13	141,310	10/23/20	Sec. 5307	Yes	Oper.	06/27/13	12 years	2025	8TR0.39.001	K006805	NY-90-X586 & X593	CP 428 & CP 429				
		Gillig	2013	R37964	D1058	22	15GGE3016D1092539	06/27/13	5575,291	17TKL2E2631131989	FR	28	2	HD	Excellent	06/27/13	133,745	10/23/20	Sec. 5307	Yes	Oper.	06/27/13	12 years	2025	8TR0.39.001	K006805	NY-90-X593	CP 428				
		Gillig	2013	R37965	D1059	23	15GGE3012D1092540	06/27/13	5575,291	17TKL2A2811280399	FR	28	2	HD	Excellent	06/27/13	127,180	10/23/20	ARRA	No	n/a	06/27/13	12 years	2025	n/a	n/a	NY-96-X014	CP401				
		Gillig	2013	R37966	D1060	24	15GGE3014D1092541	06/27/13	5575,291	17TKL2A2811280399	FR	28	2	HD	Excellent	06/27/13	67,954	10/23/20	ARRA	No	n/a	06/27/13	12 years	2025	n/a	n/a	NY-96-X014	CP401				
		Gillig	2013	R37967	D1061	25	15GGE3016D1092542	06/27/13	5575,291	17TKL2B2811101358	FR	28	2	HD	Excellent	06/27/13	96,028	10/23/20	ARRA	No	n/a	06/27/13	12 years	2025	n/a	n/a	NY-96-X014	CP401				
		Gillig	2013	R37974	D1065	28	15GGE3013D1092546	06/27/13	5575,291	17TKL2E2631131988	DFR	28	2	HD	Excellent	06/27/13	88,965	10/23/20	ARRA	No	n/a	06/27/13	12 years	2025	n/a	n/a	NY-96-X014	CP401				
Monroe Bus Lines 22 Forest Road Monroe, NY 10950																																
Monsey Trails 8 Washington Avenue Spring Valley, NY 10977	1	MCI D4500	2008	553338A		1	1M8PDMHA48P058113	07/15/07	\$483,537	n/a - addition to fleet	FR																					

# **Attachment G2: Dial-A-Ride Roster**

Name of Applicant - County of Orange  
 Name of Transit Operator - Orange County Public Transportation System  
 Statistics as of dates noted

All vehicles listed are titled to the County of Orange  
 For any buses purchased with Federal Section 5307, 5309, or 5311 funds the funding was 80% Federal, 10% State, 10% Local  
 For any buses purchased with Federal ARRA funds the funding was 100% Federal

Name and Telephone Number of Person Completing Roster - Rob Parrinotto 845-615-3852

Lease Operator	Official Fleet Size	Vehicle Make	Model Year	License Number	County Inventory Tag No.	Operator Bus #	Mfg. Body Number	Chassis Serial Number	Date Delivered to Original Operator	Original Purchase Price	Chassis Number of Bus Replaced	Type of Service	Seats	WC Seats	Fuel Type	Condition Reported	Date Commenced Reported	Mileage	Date of Funds Recorded	Source of Funds	State Funds Used?	Local Funds Source?	Date Vehicle Placed in Service	Useful Life	Year Replacement Due	NYSDOT PIN	State Contract Number	Federal Grant No.	County Proj. No.
Goshen-Chester DAB 44 Pease Drive Goshen, NY 10924	2	Ford	2012	R32629	10	9085	1FDEE4F59CDA67409	09/07/12	\$62,874.00	1FDEE4F59CDA67409	DR	12	2	G	Poor	11/21/14	129,955	03/23/20	ARRA	No	N/A	09/07/12	5 years	2017			NY-96-X014	CP 401	
		Ford	2015	AX3829	11	6193	1FDEE4F52F2DA0889	02/05/15	\$60,683.00	1FDEE4F52F2DA0889	DR	12	2	G	Excellent	2/9/15	126,162	05/22/20	Sec. 5311	Yes	Oper.	02/05/15	5 years	2020	8792.21.303	C003762	n/a	CP 496	
		Ford	2021		12	7271	1FDEE3F3KMDCC17534	04/19/21	\$78,915.00	1FDEE3F3KMDCC17534	DR	12	2	G	Excellent	4/19/21	365	06/01/21	Sec. 5311	Yes	Oper.	04/19/21	5 years	2026	8792.21.303	C004131	n/a	CP 542 / CP 483	
		Ford	2021		13	7572	1FDEE3F3KMDCC17535	04/19/21	\$78,915.00	1FDEE3F3KMDCC17535	DR	12	2	G	Excellent	4/19/21	327	06/01/21	Sec. 5311	Yes	Oper.	04/19/21	5 years	2026	8792.21.303	C004131	n/a	CP 481 / CP 483	
Highlands DAB 254 Main Street Highland Falls, NY 10928	1	Ford	2018	BB0111	E1426	26	51600	1FDEE3F3S4JDC31023	12/17/18	\$71,651.94	1FDEE3F3S4JDC31023	DR	12	2	G	Excellent	04/08/19	13,078	02/10/20	NYS-MEP	Yes	N/A	04/08/19	5 years	2024	8TR0.81.001	K007233	NY-2017-024-00	CP501
Kiryas Joel DAB Monroe, NY 10950	6	Ford	2019	BD1794	E2503	27	58990	1FDEE3F3XKDC14972	01/13/20	\$72,635.02	na	DR	12	2	G	Excellent	1/13/20	9,258	10/28/20	Sec. 5339	Yes	Oper.	05/25/20	5 years	2025	8TR0.80.001	K007233	NY-2017-024-00	CP 491
		Ford	2019	BD1802	E2882	28	65760	1FDEE3F3XKDC15248	01/13/20	\$72,635.02	na	DR	12	2	G	Excellent	01/13/20	9,006	10/28/20	Sec. 5339	Yes	Oper.	05/25/20	5 years	2025	8TR0.80.001	K007233	NY-2017-024-00	CP 491
		Ford	2019	BD1793	E2883	29	58970	1FDEE3F3XKDC14706	01/13/20	\$72,635.02	na	DR	12	2	G	Excellent	01/13/20	9,019	10/28/20	Sec. 5339	Yes	Oper.	05/25/20	5 years	2025	8TR0.81.001	K007233	NY-2017-024-00	CP 491
		Ford	2019	BD1801	E2884	30	58980	1FDEE3F3XKDC14971	01/13/20	\$72,635.02	na	DR	12	2	G	Excellent	01/13/20	9,161	10/28/20	Sec. 5339	Yes	Oper.	05/25/20	5 years	2025	8TR0.81.001	K007233	NY-2017-024-00	CP 491
		Ford	2019	BD1795	E2885	31	65800	1FDEE3F3XKDC15252	01/13/20	\$72,635.02	na	DR	12	2	G	Excellent	01/13/20	9,025	10/28/20	Sec. 5339	Yes	Oper.	05/25/20	5 years	2025	8TR0.81.001	K007233	NY-2017-024-00	CP 491
Monroe DAB 91 Mine Road Monroe, NY 10950	7	Ford	2016	AX3868	D3977	35		1FDEE4F53GDC10778	01/09/16	\$67,013.13		DR	16	2	G	Good	06/20/19	8,859	08/09/19	SDF	Yes	n/a	01/05/16	5 years	2021	8TR0.80.001	K006805	n/a	CP 501
		Ford	2018	BB8752	E0274	36	96430	1FDEE3F3JDC08227	01/04/19	\$71,651.94	1FDEE3F3JDC08227	DR	11	2	G	Excellent	04/01/19	9,949	01/11/20	Sec. 5339	Yes	Oper.	04/01/19	5 years	2024	8TR0.81.001	K007233	NY-99-9733 / NY-2017-024-00	CP 502 / CP 491
		Ford	2018	BB8751	E0275	37	96400	1FDEE3F3JDC08228	01/04/19	\$71,651.94	1FDEE3F3JDC08228	DR	11	2	G	Excellent	04/02/19	9,917	01/11/20	Sec. 5339	Yes	Oper.	04/02/19	5 years	2024	8TR0.81.001	K007233	NY-2017-024-00	CP 502 / CP 491
		Ford	2019	BB9951	E0276	38	58800	1FDEE3F3XKDC06549	03/22/19	\$71,651.94	1FDEE3F3XKDC06549	DR	12	2	G	Excellent	05/06/19	9,850	01/16/20	Sec. 5339	Yes	Oper.	05/06/19	5 years	2024	8TR0.81.001	K007233	NY-2017-024-00	CP 491
		Ford	2019	BB9952	E0277	39	56810	1FDEE3F3XKDC06550	03/22/19	\$71,651.94	1FDEE3F3XKDC06550	DR	12	2	G	Excellent	05/06/19	9,438	11/06/19	Sec. 5339	Yes	Oper.	05/06/19	5 years	2024	8TR0.81.001	K007233	NY-2017-024-00	CP 491
		Ford	2019	BB9950	E0278	40	56820	1FDEE3F3XKDC06551	03/22/19	\$71,651.94	1FDEE3F3XKDC06551	DR	12	2	G	Excellent	05/06/19	9,686	07/07/20	Sec. 5339	Yes	Oper.	05/06/19	5 years	2024	8TR0.81.001	K007233	NY-2017-024-00	CP 491
		Ford	2019	BB9949	E0290	41	56930	1FDEE3F3XKDC07316	03/22/19	\$74,445.27	1FDEE3F3XKDC07316	DR	16	2	G	Excellent	05/06/19	20,854	07/08/20	Sec. 5339	Yes	Oper.	05/06/19	5 years	2024	8TR0.81.001	K007233	NY-2017-024-00	CP 491
Montgomery-Crawford DAB Senior Bus 110 Brackett Road Montgomery, NY 12549	4	Ford	2013	RA1530	D1246	3	9873	1FDEE4F5SD0A85448	10/03/13	\$61,865.35	1FDEE4F5SD0A85448	DR	12	2	G	Poor	11/21/17	132,230	01/23/20	ARRA	No	n/a	10/03/13	5 years	2018	n/a	NY-96-X014	CP 401	
		Ford	2008	MA7608	C5222	4	3167	1FDEE4F59CDA09091	07/16/08	\$52,347.00	1FDEE4F59CDA09091	DR	12	2	D	Poor	11/21/17	168,081	01/27/20	Sec. 5307	Yes	Oper.	07/16/08	5 years	2018	n/a	NY-90-X561	CP 496	
		Ford	2015	AX4823	D2854	12	6162	1FDEE4F59CDA09092	02/06/15	\$60,683.00	1FDEE4F59CDA09092	DR	12	2	G	Poor	11/21/17	121,619	02/16/20	Sec. 5311	Yes	Oper.	02/06/15	5 years	2020	8792.21.303	C003762	CP 496	
		Ford	2015	AX4824	D2843	2	6183	1FDEE4F59CDA09093	02/06/15	\$58,330.00	1FDEE4F59CDA09093	DR	12	2	G	Poor	02/06/15	117,267	12/16/19	SDF	Yes	n/a	02/06/15	5 years	2020	8TR0.80.001	K006805	n/a	CP 501
		Ford	2021		E5273	3	75560	1FDEE3F3KMDCC14960	04/19/21	\$78,915.00	1FDEE3F3KMDCC14960	DR	12	2	G	Excellent	04/19/21	456	06/03/21	Sec. 5311	Yes	Oper.	04/19/21	5 years	2026	8TR0.79	C004131	n/a	CP 542 / CP 483
Newburgh (Tr) DAB 311 Route 32 Newburgh, NY 12550	3	Ford	2013	RA2933	D1254	15	9881	1FDEE4F5SD0A85079	11/26/13	\$61,865.35	1FDEE4F5SD0A85079	DR	12	2	G	Good	12/10/14	88,200	08/15/19	ARRA	No	n/a	11/26/13	5 years	2018	n/a	NY-96-X014	CP 401	
		Ford	2018	AM6519	E0285	14	96350	1FDEE3F3JDC08225	12/17/18	\$71,651.94	1FDEE3F3JDC08225	DR	12	2	G	Excellent	05/13/19	2,956	08/15/19	Sec. 5339	Yes	Oper.	05/13/19	5 years	2024	8TR0.81.001	K007233	NY-2017-024-00	CP 491
		Ford	2018	CB1501	E0286	16	96390	1FDEE3F3JDC07515	12/17/18	\$71,651.94	1FDEE3F3JDC07515	DR	12	2	G	Excellent	05/17/19	8,140	08/15/19	Sec. 5339	Yes	Oper.	05/17/19	5 years	2024	8TR0.81.001	K007233	NY-2017-024-00	CP 491
		Ford	2015	AX5430	D2855	109	6194	1FDEE4F59CDA08890	02/05/15	\$58,330.00	1FDEE4F59CDA08890	DR	12	2	G	Poor	02/05/15	76,811	10/19/20	Sec. 5311	Yes	Oper.	02/05/15	5 years	2020	8792.21.303	C003762	CP 496	
		Ford	2015	AX5431	D2844	110	6195	1FDEE4F59CDA08891	02/05/15	\$58,330.00	1FDEE4F59CDA08891	DR	12	2	G	Poor	02/05/15	86,891	07/12/20	SDF	Yes	n/a	02/05/15	5 years	2020	8TR0.80.001	K006805	n/a	CP 501
Port Jervis DAB 1 Franklin Street Port Jervis, NY 12771	2	Ford	2021		E5277	111	7893	1FDEE3F3KMDCC33358	04/28/21	\$78,915.00	1FDEE3F3KMDCC33358	DR	12	2	G	Excellent	04/28/21	319	06/03/21	Sec. 5311	Yes	Oper.	04/28/21	5 years	2026	8TR0.79	C004131	n/a	CP 542 / CP 483
		Ford	2021		E5278	112	7894	1FDEE3F3KMDCC33359	04/28/21	\$78,915.00	1FDEE3F3KMDCC33359	DR	12	2	G	Excellent	04/28/21	319	06/03/21	Sec. 5311	Yes	Oper.	04/28/21	5 years	2026	8TR0.79	C004131	n/a	CP 542 / CP 483
		Ford	2016	AX3661	D3975	132		1FDEE4F53GDC13119	12/30/15	\$63,170.26		DR	12	2	G	Good	09/17/18	89,906	01/06/20	SDF	Yes	n/a	12/30/15	5 years	2021	8TR0.80.001	K006805	n/a	CP 501
		Ford	2016	AX7851	D4212	134		1FDEE4F51GDC03173	04/30/16	\$63,170.26		DR	12	2	G	Good	09/17/18	80,218	07/12/20	SDF	Yes	n/a	04/30/16	5 years	2021	8TR0.80.001	K006805	n/a	CP 501
		Ford	2018	BB8749	E0282	136	96440	1FDEE3F3JDC08226	02/08/18	\$71,651.94	1FDEE3F3JDC08226	DR	12	2	G	Excellent	04/03/19	23,769	08/24/20	Sec. 5339	Yes	Oper.	04/03/19	5 years	2024	8TR0.80.001	K007233	NY-2017-024-00	CP 491
Warwick DAB 132 Kings Highway Warwick, NY 10990	9	Ford	2016	AX3879	D3976	130		1FDEE4F53GDC10779	01/09/16	\$67,013.13		DR	16	2	G	Good	03/15/18	64,953	02/24/20	SDF	Yes	n/a	01/09/16	5 years	2021	8TR0.80.001	K006805	n/a	CP 501
		Ford	2016	AX3879	D3976	130		1FDEE4F53GDC10779	01/09/16	\$67,013.13		DR	16	2	G	Good	03/15/18	64,953	02/24/20	SDF	Yes	n/a	01/09/16	5 years	2021	8TR0.80.001	K006805	n/a	CP 501
		Ford	2016	AX3879	D3976	130		1FDEE4F53GDC10779	01/09/16	\$67,013.13		DR	16	2	G	Good	03/15/18	64,953	02/24/20	SDF	Yes	n/a	01/09/16	5 years	2021	8TR0.80.001	K006805	n/a	CP 501
		Ford	2016	AX3879	D3976	130		1FDEE4F53GDC10779	01/09/16	\$67,013.13		DR	16	2	G	Good	03/15/18	64,953	02/24/20	SDF	Yes	n/a	01/09/16	5 years	2021	8TR0.80.001	K006805	n/a	CP 501
		Ford	2018	BB8745	E0280	132	51580	1FDEE3F3JDC08227	12/28/18	\$71,651.94	1FDEE3F3JDC08227																		