

Sonoma-Marin Area Rail Transit District's (SMART) 2024 Title VI Program Update



September 2024

Table of Contents

Table of Contents.....	2
SMART’S Title VI Program Introduction	4
SMART District and Project Background	4
SMART’s Title VI Program and Nondiscrimination Policy Background	6
SMART Board of Director’s Resolution Approving the 2024 Title VI Program	8
SMART Title VI Program Overview	10
SMART Title VI Nondiscrimination Policy	10
Title VI Public Notice and Notice Postings	11
SMART’s Title VI Notice.....	14
SMART Title VI Nondiscrimination Complaint Procedures.....	15
SMART’s Civil Rights Complaint form for Title VI and ADA Complaints.....	18
Transit-Related Title VI Investigations, Complaints, And Lawsuits	20
SMART’s Public Participation Plan (PPP)	21
Public Participation Plan Overview	21
Santa Rosa Community Meeting	22
Construction Outreach.....	22
Pathway Outreach	25
Youth Ride Free Summer Campaign	26
Rail Safety Information	28
SMART’s Advisory Body Composition	30
Limited English Proficiency (LEP) Four Factor Analysis and Plan.....	32
Limited English Proficiency (LEP) Plan Overview	32
Four Factor Analyses	32
LEP Plan/Language Assistance Plan (LAP)	40
Language Assistance Measures	41
Staff Training	43
Outreach Techniques	43
Monitoring and Updating the LEP Plan	44
Dissemination of the SMART LEP Plan	44
Subrecipient Oversight and Assistance with Title VI Compliance	45

Facility Site and Equity Analysis	46
Smart’s Title VI Systemwide Standards and Service Policies	47
System-Wide Service Standards	47
System Configuration	47
System-Wide Service Policies	47
Vehicle Assignment.....	47
Schedule	48
Vehicle Headways.....	49
Vehicle Load.....	49
On-time Performance.....	50
Service Availability	50
Transit Amenities and Amenities Policy	51
Requirement to Evaluate Service and Fare Changes	53
Fare Increase and Major Service Change Policy.....	54
Requirement to Monitor Transit Service	55
APPENDIX A: SMART’s Civil Rights Complaint Form for Title VI and ADA Complaints.....	56
APPENDIX B: Public Participation Plan (PPP).....	59
Public Participation Plan Overview	59
Public Engagement Goals	59
Public Engagement Means and Methods	60
SMART Board of Directors.....	60
Community Relations and Outreach.....	60
Digital and Print Materials.....	63
Strategies to Reduce Barriers	64
Geographic Barriers	64
Language Barriers	64

SMART'S Title VI Program Introduction

SMART District and Project Background

The SMART District was created by an act of the California Legislature, Assembly Bill (AB) 2224, also known as the Sonoma-Marin Area Rail Transit District Act, effective January 1, 2003, and codified in the Public Utilities Code section 105000, et. seq. The District's boundaries include all of Marin and Sonoma Counties. The SMART project involves rebuilding and operating a 70-mile passenger rail service within the publicly owned SMART right of way through Marin and Sonoma counties. The project also includes the provision of a multi-use pathway to facilitate first/last mile connections to SMART's passenger rail system. A map of the project is shown in Figure 1.

SMART's locally funded, initial operating segment opened to public passenger service in Summer 2017. This first phase of the project included 43-miles of rail operating between Downtown San Rafael in the south and Sonoma County Airport Boulevard in the north, serving the major employment and population centers in the two counties. In late 2017, SMART began construction on a two-mile southern extension between Downtown San Rafael and Larkspur. At the end of 2019, the Larkspur extension opened, growing SMART's system to include 12 rail stations and extending SMART's passenger rail line to 45-miles.

A rail and pathway extension to the Town of Windsor and the construction of an infill station in North Petaluma are both underway, expected to be completed in early 2025. These projects will increase SMART's system to 14 rail stations and 48 miles of active rail service between the City of Larkspur in Marin County and the Town of Windsor in Sonoma County.

The full buildout of the envisioned commuter rail project will result in a 70-mile route between the cities of Cloverdale, in Sonoma County, and Larkspur, with a total of 16 rail stations, including two planned stations in the cities of Healdsburg and Cloverdale.

Figure 1: SMART System Map



SMART's Title VI Program and Nondiscrimination Policy Background

The SMART District is committed to ensuring that no person is excluded from participation in or denied the benefits of its transit services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964. Effective July 2015, the Sonoma-Marine Area Rail Transit District (SMART) has been designated a Federal Transit Administration (FTA) grantee (direct recipient of FTA grant funds). As an FTA direct grantee, SMART is required to have policies and processes in place pursuant to Title VI of the Civil Rights Act of 1964 to meet the following objectives:

- Ensure that the level and quality of public transportation service is provided without regard to race, color, or national origin.
- Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin.
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

This SMART Title VI Program and Nondiscrimination Policy is intended to demonstrate compliance with the transit provider reporting requirements outlined in FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," effective October 1, 2012 (Federal Register Docket Number FTA-2011-0054). As required by FTA Circular 4702.1B, this SMART program documentation is updated every three (3) years. SMART's 2024 Title VI Program details SMART's implementation of Title VI, while also providing information regarding how SMART has historically acted in compliance with Title VI.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin in programs or activities receiving federal financial assistance. Presidential Executive Order 12898 addresses environmental justice in minority and low-income populations. Presidential Executive Order 13166 addresses services to those individuals with limited English proficiency. The rights of women, the elderly and the disabled are protected under related authorities. These Presidential Executive Orders and the related authorities fall under the umbrella of Title VI. SMART's Title VI/Nondiscrimination Program provides leadership, direction, and policy to ensure compliance with Title VI of the Civil Rights Act of 1964 and related authorities. In addition to compliance with federal civil rights requirements through its Title VI program, SMART's Nondiscrimination Policy seeks to not discriminate on the grounds of religion, family status, sexual orientation, or gender identity.

SMART's first Title VI Program and Nondiscrimination Policy was adopted by the SMART Board in 2015, when the District was still in its planning and construction phase. SMART commenced passenger service along the initial operating segment in 2017, and subsequently updated the Title VI Program in 2018 and 2021. SMART's Title VI Program and

Nondiscrimination Policy has guided the District as it continues its transition from being a planning and construction agency to an operator of the rail system.

This 2024 Title VI Program has been prepared with 2022 American Communities Survey data and with the most recent 2020 Census.

SMART Board of Director's Resolution Approving the 2024 Title VI Program

Resolution No. 2024-27
Sonoma-Marín Area Real Transit District
September 18, 2024

RESOLUTION OF THE BOARD OF DIRECTORS OF THE SONOMA-MARIN AREA RAIL TRANSIT DISTRICT ADOPTING A TITLE VI TRIENNIAL PROGRAM AND NONDISCRIMINATION POLICY FOR 2024-2027

WHEREAS, Title VI (codified at 42 U.S.C. §2000d et seq.) of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance; and

WHEREAS, the Federal Transit Administration (FTA) issued Title VI Circular 4702.1B, effective October 1, 2012, setting forth requirements and guidelines for Title VI compliance; and

WHEREAS, the above-referenced Circular details required elements of the Title VI Program, which each recipient of FTA assistance must submit to the FTA triennially (every three years); and

WHEREAS, the above-referenced Circular requires SMART's Board of Directors to approve SMART's Title VI Program before it is submitted to the FTA; and

WHEREAS, SMART, as an FTA Direct Recipient, is required to have in place a Title VI program that ensures that the level and quality of public transportation service is provided in a nondiscriminatory manner, promotes full and fair participation in public transportation decision-making without regard to race, color or national origin, and ensures meaningful access to transit-related programs and activities by persons with limited English proficiency; and

WHEREAS, SMART's Title VI Program must contain numerous elements, including but not limited to, SMART's:

1. Title VI Notice to the Public
2. Title VI Complaint Procedures
3. Title VI Complaint Form
4. List of Transit-Related Title VI Complaints, Investigations, and Lawsuits
5. Public Participation Plan
6. Limited English Proficiency Language Access Plan
7. Table Depicting Racial Breakdown of Non-Elected Boards and Committees
8. Evidence of the Board's Review and Approval of the Title VI Program
9. System-Wide Service Standards and Policies, Result of Service Monitoring and evidence of the Board's Approval of Such Monitoring
10. Description of the Public Engagement Process used for Adoption of the Major Service Change, Disparate Impact, and Disproportionate Burden Policies; and

WHEREAS, staff has developed a proposed Title VI Program (provided to the Board via staff report), including the above-referenced items and evidencing SMART's compliance with Title VI, for Board consideration and approval.

**Resolution No. 2024-27
Sonoma-Marín Area Real Transit District
September 18, 2024**

NOW, THEREFORE, BE IT RESOLVED THAT THE Board of Directors of the Sonoma-Marín Area Rail Transit District adopts the SMART Title, VI Program; and

BE IT FURTHER RESOLVED that the Board of Directors authorizes the General Manager, or a designee, to:

1. Include evidence of the Board's consideration and approval of the final SMART Title VI Program;
2. Submit the final SMART Title VI Program to the FTA;
3. Make non-policy and administrative changes to the SMART Title VI Program as needed, with changes reported to the Board; and
4. Take any other steps necessary to give effect to this Resolution, including responding to any follow-up inquiries from the FTA.

PASSED AND ADOPTED at a regular meeting of the Board of Directors of the Sonoma-Marín Area Rail Transit District held on the 18th day of September 2024, by the following vote:

DIRECTORS:

AYES: Bagby, Colin, Coursey, Farac, Fudge, Garbarino, Lucan, Pahre, Rabbitt and Sackett

NOES:

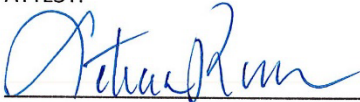
ABSENT: Paulson and Rogers

ABSTAIN:



Eric Lucan, Chair, Board of Directors
Sonoma-Marín Area Rail Transit District

ATTEST:



Leticia Rosas, Clerk of Board of Directors
Sonoma-Marín Area Rail Transit District

SMART Title VI Program Overview

SMART Title VI Nondiscrimination Policy

It is the policy of the SMART District, under Title VI of the Civil Rights Act of 1964 and related statutes and regulations, that no person in the United States shall, on the basis of race, color, national origin, sex, age, disability, or income status, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any federally or non-federally funded program or activity administered by SMART or its sub-recipients. In compliance with other civil rights provisions, SMART will not discriminate on the grounds of religion, family status, sexual orientation, or gender identity. No person will be retaliated against for complaining of discrimination or for participating in an investigation of discrimination.

SMART will ensure that its programs, policies, and activities comply with Title VI of the Civil Rights Act of 1964, as amended, and Department of Transportation regulations. SMART has designated a Title VI Coordinator in the District's administrative offices to receive any formal Title VI complaints (via the process described below). The Title VI Coordinator is the person responsible for record keeping for complaints related to SMART and reporting those complaints as part of any updates to this SMART Title VI/Nondiscrimination Program every three years.

To effectively implement and sustain the Title VI Program and related statutes, mandatory training is provided to SMART staff upon hiring and periodically thereafter. Training includes information on the SMART Title VI Procedures and Limited English Proficiency (LEP) responsibilities, description of language assistance services offered to the public, documentation of language assistance requests, and how to handle a potential Title VI/LEP complaint. SMART maintains records of SMART staff training on Title VI Program and Nondiscrimination Policy compliance and provides training to new employees. In FY 2022, SMART trained 152 existing and 14 new staff members. Additional employees were trained as part of the hiring process in FY 2023 (33 employees) and FY 2024 (10 employees). As part of SMART's regular staff training intervals, all staff were retrained on Title VI in FY 2024.

Title VI Public Notice and Notice Postings

SMART seeks to ensure members of the public are informed of their rights under Title VI, and SMART will do so by posting the Title VI notice throughout SMART's system and through various platforms of communication. Specifically, SMART will post the Title VI notice on:

- Customer Service Desk (Figure 2),
- Rail platform signage in station shelters (Figure 3),
- SMART's website (<https://sonomamarintrain.org/civil-rights>) (Figure 4)
- SMART's Board Room.

Notices detailing SMART's Title VI obligations and complaint procedures will be translated into English, Spanish, Chinese, Vietnamese, and Tagalog. These notices will be translated into other languages as needed.

Figure 2: Title VI Notice displayed at SMART's Customer Service Desk

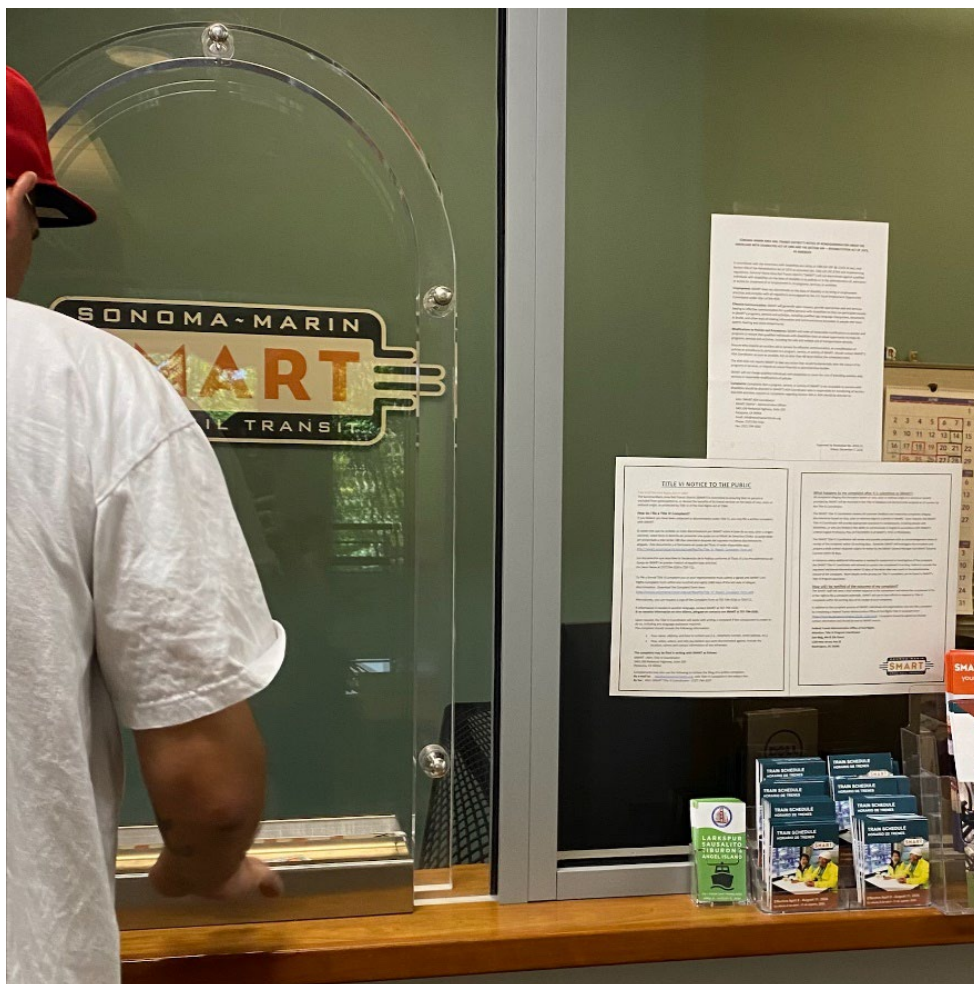
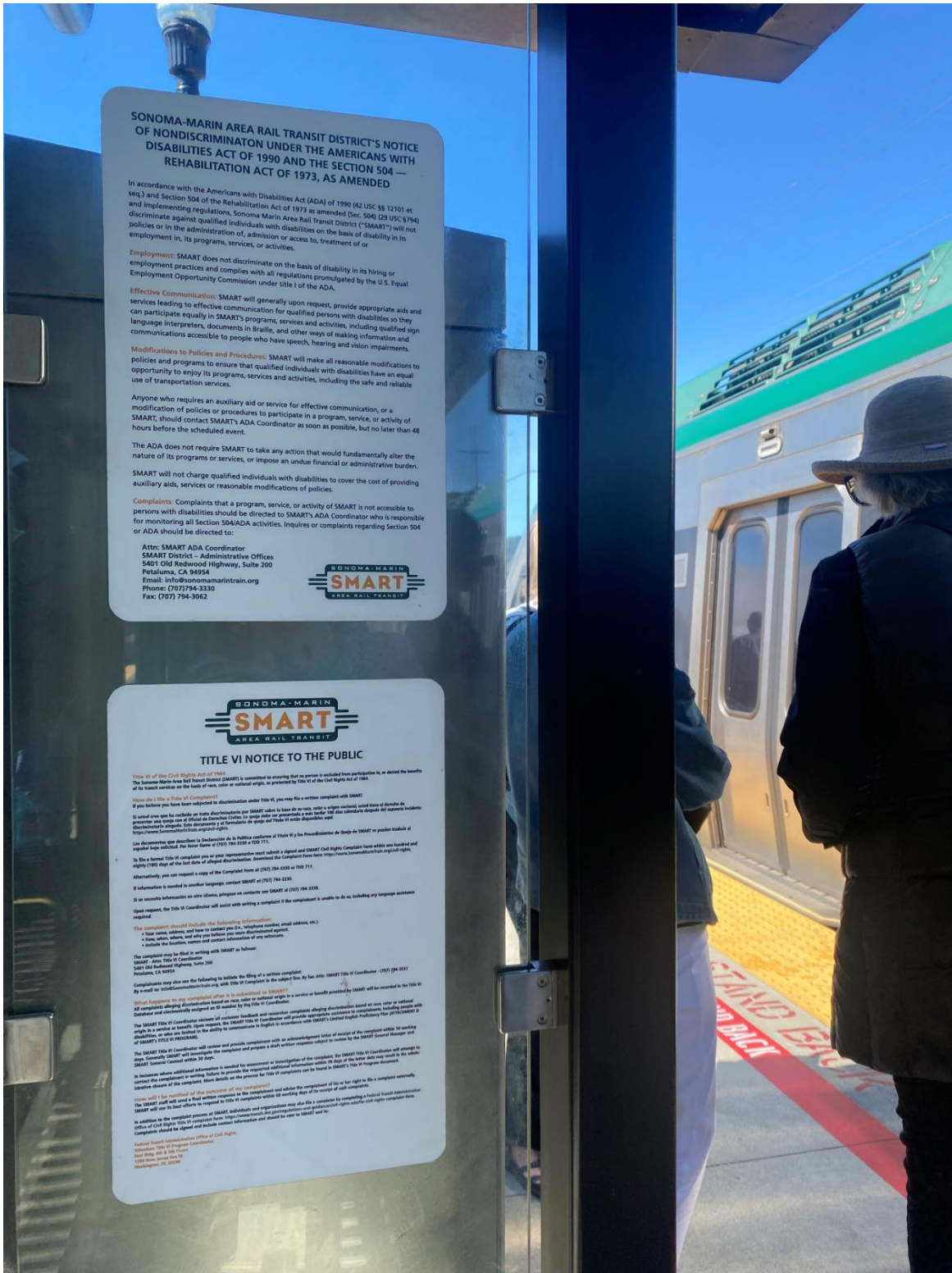


Figure 3: Title VI Notice on SMART's Rail Platform



SONOMA-MARIN AREA RAIL TRANSIT DISTRICT'S NOTICE OF NONDISCRIMINATION UNDER THE AMERICANS WITH DISABILITIES ACT OF 1990 AND THE SECTION 504 — REHABILITATION ACT OF 1973, AS AMENDED

In accordance with the Americans with Disabilities Act (ADA) of 1990 (42 USC §§ 12101 et seq.) and Section 504 of the Rehabilitation Act of 1973 as amended (29 USC §§ 7941-7942) and implementing regulations, Sonoma Marin Area Rail Transit District ("SMART") will not discriminate against qualified individuals with disabilities on the basis of disability in its employment in, its programs, services, or activities.

Employment: SMART does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under title I of the ADA.

Effective Communication: SMART will generally upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in SMART's programs, services and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing and vision impairments.

Modifications to Policies and Procedures: SMART will make all reasonable modifications to its policies and programs to ensure that qualified individuals with disabilities have an equal opportunity to enjoy its programs, services and activities, including the safe and reliable use of transportation services.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of SMART, should contact SMART's ADA Coordinator as soon as possible, but no later than 48 hours before the scheduled event.

The ADA does not require SMART to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden. SMART will not charge qualified individuals with disabilities to cover the cost of providing auxiliary aids, services or reasonable modifications of policies.

Complaints: Complaints that a program, service, or activity of SMART is not accessible to persons with disabilities should be directed to SMART's ADA Coordinator who is responsible for monitoring all Section 504/ADA activities. Inquiries or complaints regarding Section 504 or ADA should be directed to:

Attn: SMART ADA Coordinator
SMART District – Administrative Offices
5451 Old Redwood Highway, Suite 200
Petaluma, CA 94954
Email: info@sonomamarintrain.org
Phone: (707) 794-3330
Fax: (707) 794-3062

SONOMA-MARIN SMART AREA RAIL TRANSIT

TITLE VI NOTICE TO THE PUBLIC

Title VI of the Civil Rights Act of 1964
The Sonoma-Marin Area Rail Transit District (SMART) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color or national origin, as prohibited by Title VI of the Civil Rights Act of 1964.

How do I file a Title VI Complaint?
If you believe you have been subjected to discrimination under Title VI, you may file a written complaint with SMART.

I cannot sue you for violations of Title VI unless you have first exhausted your administrative remedies. You must first file a written complaint with SMART. SMART will not accept any complaints that are filed after the 180-day deadline for filing a complaint with SMART.

Los documentos que describen la Discriminación de la Política conformes al Título VI o los Procedimientos de quejas de SMART o pueden traducidos al español por escrito. Por favor llame al (707) 794-3330 o (707) 794-3062.

In this limited time of complaint you or your representative must submit a signed and dated Title VI Complaint Form within sixty business days and ninety (90) days of the last date of alleged discrimination. Subsequent complaints have been rejected. Communication is an ongoing right.

Alternatively, you can request a copy of the Complaint form at (707) 794-3330 or (707) 794-3062.

If you require assistance in writing language, contact SMART at (707) 794-3330.

Smart response: The Title VI Coordinator will assist with writing a complaint if the complainant is unable to do so, including any language assistance required.

The complainant should include the following information:

- Your name, address, and how to contact you (i.e., telephone number, email address, etc.)
- How, when, where, and why you believe you were discriminated against.
- Include the location, names and contact information of any witnesses.

The complainant may file in writing with SMART as follows:
SMART, Attn: Title VI Coordinator
5451 Old Redwood Highway, Suite 200
Petaluma, CA 94954

Complainants may also use the following to submit the filing of a written complaint:
By email to: info@sonomamarintrain.org, with Title VI Complaint to the subject line. By fax to: SMART Title VI Coordinator – (707) 794-3062

Complaints received by any complaint office it is submitted to SMART.

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by SMART will be resolved in the Title VI Complaint and satisfactorily resolved on 90 calendar days by the Title VI Coordinator.

The SMART Title VI Coordinator reviews all complaints and reserves the right to investigate complaints alleging discrimination based on race, color or national origin, or title or national origin, or title or national origin. SMART Title VI Coordinator will provide appropriate assistance to complainants. (Title VI/504/ADA) is not limited to the ability to communicate in English in accordance with SMART's Limited English Proficiency (LEP) Policy.

The SMART Title VI Coordinator will review and provide a complaint with an acknowledgment letter of receipt of the complaint within 30 business days. Generally SMART will investigate the complaint and prepare a draft written response subject to review by the SMART General Manager and an ADA/504/ADA/LEP.

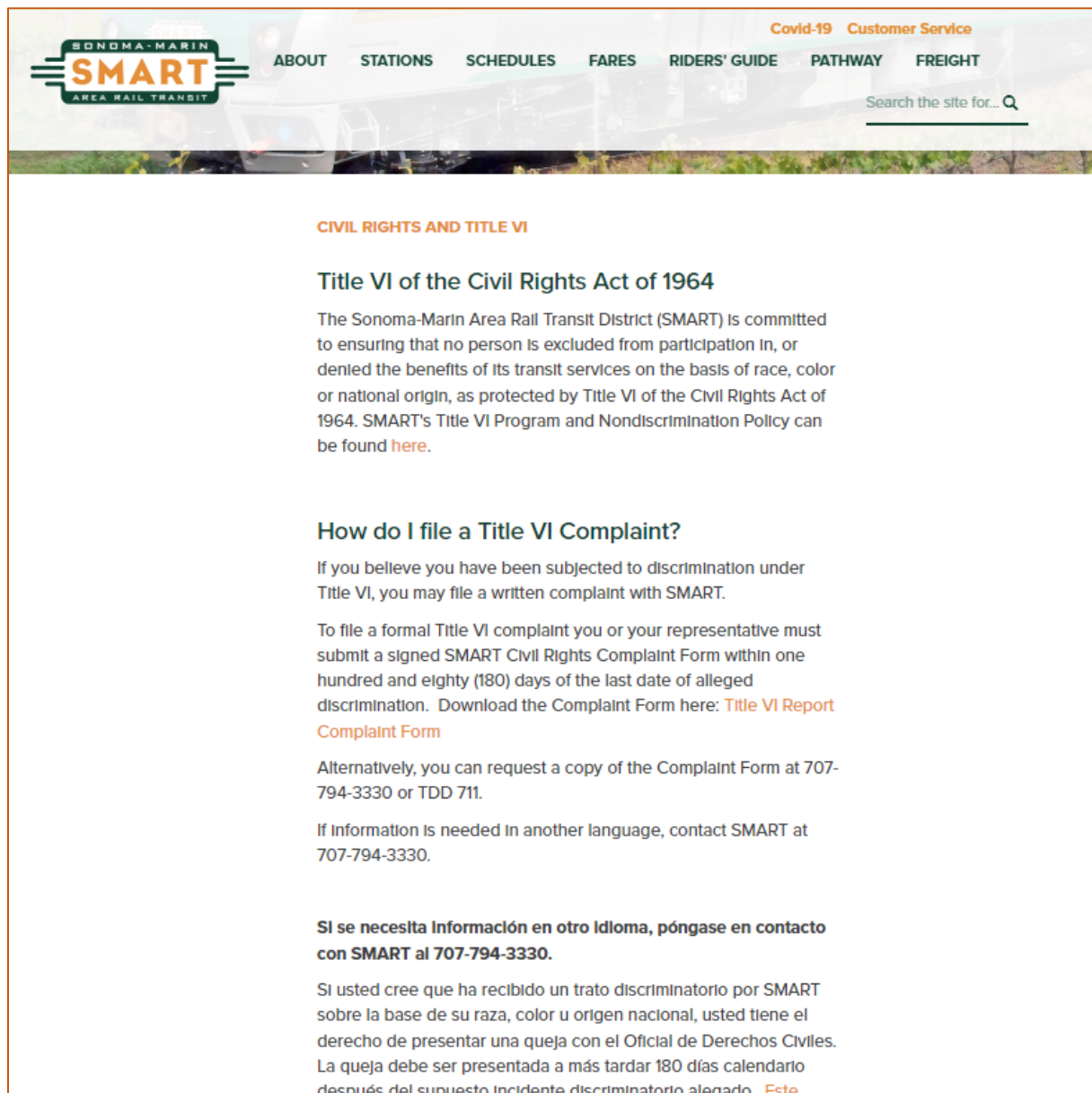
In instances where additional information is needed for assessment or investigation of the complaint, the SMART Title VI Coordinator will attempt to contact the complainant in writing. Failure to provide the requested information within 90 days of the letter date may result in the complaint being considered as a complaint without sufficient information to proceed with the SMART Title VI program document.

How will I be notified of the outcome of my complaint?
The SMART will send a draft written response to the complainant within 90 writing days of the receipt of each complaint.

In compliance with the complaint process at SMART, individuals who report a complaint may also file a complaint to the U.S. Department of Justice, Office of Civil Rights Title VI or Department of Justice, Office of Equal Opportunity and Administrative Rights under the Civil Rights Complaint Form.

Complaints should be signed and include contact information and should be sent to SMART and to:
Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
1400 21st Street, NW
Washington, DC 20590

Figure 4: SMART's Civil Rights and Title VI information on the SMART's website



The image is a screenshot of the SMART website's Civil Rights and Title VI page. At the top, there is a navigation bar with the SMART logo on the left and menu items: ABOUT, STATIONS, SCHEDULES, FARES, RIDERS' GUIDE, PATHWAY, and FREIGHT. To the right of the menu are links for 'Covid-19' and 'Customer Service', and a search bar with the text 'Search the site for...' and a magnifying glass icon. The main content area has a heading 'CIVIL RIGHTS AND TITLE VI' in orange. Below this is a section titled 'Title VI of the Civil Rights Act of 1964' in bold. The text explains that SMART is committed to ensuring no one is excluded from its services based on race, color, or national origin, as protected by Title VI of the Civil Rights Act of 1964. It mentions that SMART's Title VI Program and Nondiscrimination Policy can be found [here](#). A sub-section titled 'How do I file a Title VI Complaint?' follows. It states that if someone believes they have been discriminated against, they can file a written complaint with SMART. To file a formal complaint, they must submit a signed SMART Civil Rights Complaint Form within 180 days of the alleged discrimination. A link is provided to download the 'Title VI Report Complaint Form'. Alternatively, a copy of the form can be requested by calling 707-794-3330 or TDD 711. The page also includes a Spanish-language section: 'Si se necesita información en otro idioma, póngase en contacto con SMART al 707-794-3330.' This section explains that if someone believes they have received discriminatory treatment from SMART based on race, color, or national origin, they have the right to file a complaint with the Civil Rights Officer. The complaint must be filed within 180 calendar days of the alleged incident. A link is provided for more information: [Este](#).

SMART's Title VI Notice

The Sonoma-Marín Area Rail Transit District (SMART) is committed to ensuring no person is excluded from participation in or denied benefits of its programs and services on the basis of race, color, and national origin as protected by Title VI of the Civil Rights Act of 1964. Any person who believes that they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with SMART.

For more information on SMART's Title VI program, and the procedures to file a complaint, contact 707-794-3330 or TTY711; email: TitleVI@sonomamarintrain.org; or visit SMART's administrative office at 5401 Old Redwood Hwy., Suite 200, Petaluma, CA 94954 or SMART's website at <https://sonomamarintrain.org/civil-rights>.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

If information is needed in another language, contact 707-794-3330.

Si necesita información en otro idioma, comuníquese al 707-794-3330.

如果需要其他语言的信息，请联系 707-794-3330。

Nếu cần thông tin bằng ngôn ngữ khác, vui lòng liên hệ số 707-794-3330.

Kung kailangan ng impormasyon sa ibang wika, mangyaring tumawag sa 707-794-3330.

SMART Title VI Nondiscrimination Complaint Procedures

SMART has established the following Title VI complaint procedures:

1. Any person who believes that they or any specific class of persons, have been discriminated against on the basis of race, color, or national origin by SMART, may file a written Title VI complaint with SMART. SMART investigates complaints filed within 180 calendar days after the alleged incident. SMART will process complaints that are complete. SMART's Civil Rights complaint form is available on SMART's website at <https://sonomamarintrain.org/civil-rights> in a fillable PDF form or can be requested at SMART's customer service desk at SMART's Administrative Offices.

2. Title VI complaints shall be submitted in person, or via mail, fax or email to:

SMART Title VI Coordinator
SMART District – Administrative Offices
5401 Old Redwood Highway, Suite 200
Petaluma, CA 94954
TitleVI@sonomamarintrain.org
Phone: (707) 794-3330
Fax: (707) 794-3037

3. All verbal complaints received by SMART shall be resolved informally when feasible. Informal complaints can be received by phone. However, once a complaint is written it becomes a formal complaint. If the issue has not been satisfactorily resolved through informal means, or if at any time the person(s) request(s) to file a formal written complaint, the SMART Title VI Coordinator shall process the complaint in accordance with approved SMART formal Title VI complaint procedures. In cases where the complainant is unable to prepare a written complaint, SMART's Title VI Coordinator will assist in converting the verbal complaint to writing. SMART's representative will assist those with Limited English Proficiency (LEP) in filing a complaint.

4. Formal Complaints shall set forth as fully as possible the facts and circumstances surrounding the alleged discrimination and shall include the following information:
 - Name, address, and phone number of the Complainant
 - A written statement of the complaint, including the following details:
 - Basis of complaint (i.e., race, color, and national origin)
 - The nature of the incident that led the complainant to feel discrimination was a factor
 - A detailed explanation of the alleged discriminatory act(s)

- The date or dates on which the alleged discriminatory event or events occurred
 - If applicable, name(s) of alleged discriminating official(s)
 - Names, addresses and telephone numbers of persons who may have knowledge of the event(s)
 - Other agencies (state, local, or federal) where the complaint is also being filed (if applicable).
 - Complainant's signature and date.
5. Within 10 working days of receipt of a formal complaint, SMART's Title VI Coordinator will review and will provide the complainant with an acknowledgement letter informing the Complainant whether the complaint will be investigated by SMART or forwarded to the appropriate agency or organization for response.
6. SMART's investigation may include a review of all relevant documents, practices and procedures as well as discussion(s) of the complaint with all affected parties to determine the nature of the problem. If more information is needed to investigate the complaint, SMART may contact the complainant. In the event of such request, the complainant has 30 days from the date of the letter to provide the requested information. If SMART is not contacted by the complainant or does not receive the additional information within 30 days, SMART can administratively close the investigation. An investigation can also be administratively closed if the complainant no longer wishes to pursue their complaint. SMART's investigation will be conducted and generally completed within 60 days of receipt of a formal complaint.
7. Based on the information received, the SMART Title VI Coordinator prepares a written report to SMART's General Manager and General Counsel which includes a summary description of the incident findings and including:
- The date of the written complaint
 - The date the complaint was received by SMART
 - The basis of the complaint (race, color, national origin, etc.)
 - A summary of the allegation(s)
 - Other agencies (state, local, or federal), if any, where the complaint has been filed, if any.
8. SMART will then issue a closing letter to the complainant and Respondent, if applicable.

9. A person may also file a complaint directly with the Federal Transit Administration Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

10. If information regarding SMART Title VI Complaint procedures is needed in another language, contact SMART Customer Service at (707) 794-3330 for assistance.

SMART's Civil Rights Complaint form for Title VI and ADA Complaints



Civil Rights Complaint Form
(Title VI and ADA/§504 Complaints)

Section I:

Name: Telephone (Home/Cell):
Address: Telephone (Work/Other):
Email Address:
Accessible Format Requirements: Large Print Audio Tape
 IDD Other:

Section II:

Are you filing this complaint on your own behalf? Yes* No

*If you answered "yes" to this question, go to **Section III**.

If not, please supply the name and relationship of the person for whom you are complaining:

Please explain why you have filed for a third party

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. Yes No

Section III:

Title VI Complaint ADA/§504 Complaint

I believe the discrimination I experienced was based on (check all that apply):

Race Color National Origin Disability Other

Date and time of Alleged Discrimination (Month, Day, Year)

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved, include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please attach additional page(s) to this form.

Section IV

Have you previously filed a Title VI/ ADA complaint with this agency? Yes No

Section V

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? Yes No

If Yes, check all that apply:

- Federal Agency
- State Agency
- Federal Court
- Local Agency
- State Court

Please provide information about a contact person at the agency/court where the complaint was filed:

Name:

Title:

Agency:

Address:

Telephone Number:

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

Signature and date required below:

Signature Date

Signature (of person assisting complainant, if needed) Date

Please submit this form in person at either address below, or mail, email or fax this form to:

SMART - Attn: Title VI Coordinator
5401 Old Redwood Highway, Suite 200
Petaluma, CA 94954
Phone: 707-794-3330
Fax: (707) 794-3037 (Attn: SMART Title VI Coordinator)
Email: TitleVI@sonomamarintrain.org (include "Title VI Complaint" in the subject line)

Transit-Related Title VI Investigations, Complaints, And Lawsuits

In accordance with FTA Circular 4702.1B, this update of SMART's Title VI Program details any transit-related Title VI investigation(s), lawsuit(s), or complaint(s) that have been filed since the last report in 2021. This list includes the date; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint.

Since the last report in 2021, SMART has conducted one formal investigation in response to one formal complaint received. On April 15, 2024, SMART received an internal Title VI complaint form from a customer, dated April 13, 2024, alleging discrimination based upon race. SMART's Title VI coordinator conducted an investigation of the complaint pursuant to its Title VI Complaint procedures. The allegations of discrimination in violation of Title VI were not sustained. On May 31, 2024, the Complainant was notified of the outcome of the investigation, and the right to file a complaint externally with the Federal Transit Administration, Office of Civil Rights.

No lawsuits have been filed regarding Title VI compliance since the last report in 2021.

SMART's Public Participation Plan (PPP)

Public Participation Plan Overview

SMART involves the public in regular information exchange in an effort to educate the public on SMART's services and projects and to gather input that informs SMART's provision of transportation facilities and services. As such, SMART seeks to promote public involvement opportunities and information exchange activities in all of the District's functional areas. Public engagement and communications are facilitated through a wide array of techniques and approaches that are inclusive, accessible, and are appropriately adapted for local area conditions in an effort to meet the needs of SMART's communities.

The SMART Public Participation Plan (PPP) is included as APPENDIX B. The SMART PPP identifies strategies to effectively involve the public in transportation decision-making. It describes a variety of methods and techniques to involve the public in the development of transportation plans, programs, and projects. Title VI and Limited English Proficiency compliance are integrated into SMART's public outreach techniques and methods.

SMART has been proactive in its efforts to engage the public in meaningful dialogue through a variety of means and programs outlined in the PPP. In addition to traditional methods, such as community events, presentations and meetings, SMART also utilizes social media and digital methods to engage the public. The following sections detail examples of engagement that has occurred since the last Title VI Program Update in 2021.

From October 2021 through August 2024, SMART participated in over 50 community events, including classroom visits, senior expos, wellness and job fairs, and various annual community events, to reach broad and diverse audiences in Marin and Sonoma counties.

A notable initiative is the expanded Field Trip program launched in January 2023. This program allows students the opportunity to ride the train to a variety of destinations on the corridor and learn about rail safety. It serves a diverse group of students from various cultural and economic backgrounds.

SMART engaged in several annual community events:

- Rotary Earth Day
- Senior Expos in Marin and Sonoma counties
- Butter and Egg Festival
- Cloverdale Citrus Fair
- Novato Festival of Art, Wine and Music
- May Madness Car Show and Parade
- Corte Madera Heritage Festival
- Marin County Fair
- National Night Out (Rohnert Park and San Rafael)

- Sonoma County Fair

Additionally, SMART participated in the Binational Health Series at the Resurrection Roman Catholic Parish Church, where we connected with many Spanish-speaking families and informed them about public transit services. We highlighted SMART's youth and seniors ride-free promotions and outreach, focusing on individuals facing financial insecurity. Most recently, we attended a Back-to-School Palooza that served over 200 low income, Latino students.

These efforts underscore SMART's commitment to engaging with diverse communities and providing valuable educational experiences through our outreach initiatives.

The following sections highlight some key examples of SMART's outreach efforts that have occurred since the 2021 Title VI Program.

Santa Rosa Community Meeting

In March 2023, SMART and the City of Santa Rosa jointly hosted a community meeting to discuss the status of the City's proposed Jennings Avenue Rail Crossing across SMART's tracks in Santa Rosa. The meeting was hosted in a hybrid format, online via Zoom and in person at Helen Lehman Elementary School. Spanish interpretation and translation services were available. A separate online feedback form was provided to gather input and was available in English and Spanish.

Figure 5: In-Person Attendees at the March 2023 Santa Rosa Community Meeting Held Jointly by SMART and the City of Santa Rosa



Construction Outreach

Over the last three years, SMART has had seven projects in construction including the:

1. Lakeville Ave. to Payran Ave. Project in Petaluma,
2. Payran Ave to Southpoint Blvd. Pathway Project in Petaluma,
3. Southpoint Blvd. to Main St. Pathway Project between Petaluma and Penngrove,

4. McInnis Pkwy. to Smith Ranch Rd. Pathway Project in San Rafael,
5. Petaluma North Infill Rail Station Project in Petaluma,
6. Windsor Rail Extension Project from North Santa Rosa to the Town of Windsor, and
7. Golf Course Dr. to Bellevue Ave. Pathway Project between Rohnert Park and Santa Rosa.

SMART engages in construction outreach activities to support community awareness of SMART projects, inform residents of construction activities, and advise members of the public on avoiding construction-related impacts. SMART posts notices online, at stations, on social media, news publications, and local partners to help keep the public informed. Outreach also includes the neighborhood information distribution through bilingual door hangers with content in both English and Spanish. These activities are additional to the regular customer communications through social media and onboard trains during service hours.

Figure 6: SMART Construction Notice Door Hanger Material in English and Spanish

PETALUMA NORTH STATION CONSTRUCTION NOTICE

SMART contractor Stacy & Witbeck/Ghilotti Brothers, Inc. is mobilizing to begin construction of the Petaluma North Station located at Corona Road. Due to daytime passenger service, some overnight work will be required. Activities will include: construction of the station platform, sidewalk and pathway, reconstructing the tracks, and train control systems testing.

Overnight construction work on the platform is scheduled for January 26/27 and February 2/3, 9 PM—5 AM.


Work hours are generally 7 AM—7 PM with some overnight work expected. Construction activities and equipment will produce some dust and noise. Expect the beeping sound of vehicles backing up and construction lights at night.

Completion of the station is expected in late December 2024.


See map below with construction zone in **red**.


For more information about SMART construction please visit www.sonomamarintrain.org/construction-updates. To sign up for email updates scan the QR code below or use this link: <http://eepurl.com/IHC0Pc>.

Safety is our first priority. We work hard to maximize safety during our construction phase. Please do your part and stay clear of all construction equipment and activities.



Subscribe for Updates





AVISO DE CONSTRUCCIÓN DE LA ESTACIÓN PETALUMA NORTH

Stacy & Witbeck/Ghilotti Brothers Inc., contratista de SMART, se está movilizandando para comenzar la construcción de la estación Petaluma North ubicada en Corona Road. Debido al servicio de pasajeros durante el día, será necesario realizar algunos trabajos durante la noche. Las actividades incluyen la construcción de la plataforma de la estación, la banqueta, la reconstrucción de la vía y las pruebas de los sistemas de control de trenes.

Los trabajos de construcción nocturnos en la plataforma están programados para el 19 y 20 de enero, de 9 PM a 5 AM.


El horario de trabajo generalmente sera de 7 AM a 7 PM y se puede esperar algo de trabajo durante la noche. Actividades y equipos de construcción producirán algo de polvo y ruido. Espere el pitido de los vehículos dando marcha atrás y las luces de construcción por la noche.

Se espera que la estación esté terminada a finales de diciembre de 2024.


Vea el mapa a continuación con la zona de construcción en **rojo**.

Para obtener más información sobre la construcción SMART, visite www.sonomamarintrain.org/construction-updates. Para registrarse para recibir actualizaciones por correo electrónico, escanee el código QR a continuación o utilice este enlace: <http://eepurl.com/gNquwT>.

La seguridad es nuestra principal prioridad y trabajamos duro para maximizar la seguridad durante nuestro trabajo de construcción. Haga su parte y manténgase alejado de todos los equipos y actividades de construcción.



Suscríbese para recibir actualizaciones






Figure 7: SMART Construction Notice Detour Information in English and Spanish

North McDowell Blvd. detour on April 12-15, 2024
Desvío en North McDowell Blvd. el 12 -15 de abril, 2024



Pathway Outreach

The SMART Pathway is considered a transit facility as it provides first and last mile access to SMART rail stations. The Pathway is an important component of SMART’s system, particularly as a high proportion (around 13-15%) of SMART passengers bring bicycles on-board the train. In 2023, SMART conducted an intercept survey of Pathway users to understand the trip purpose for users, their trip frequency on the pathway, and to better understand what concerns or improvements they would like addressed. The survey was conducted in-person and was available online in both English and Spanish.

Figure 8: Sandwich Board in English and Spanish located on the Pathway as part of SMART's 2023 Pathway Intercept Survey



Youth Ride Free Summer Campaign

In partnership with the other transit providers in Marin and Sonoma Counties, SMART offered free fares for youth in Summer 2023. The campaign was intended promote local and regional transit services as an affordable and safe way to travel. See Figure 9 below for promotional material in Spanish.

Figure 9: Youth Ride Free Summer 2023 Spanish Advertisement

Verano 2023
Jóvenes Viajan Gratis

Sonoma County Transit
SMART
Santa Rosa CityBus
marin transit
Petaluma Transit

visitenos en linea

SMART
sonomamarintrain.org/YRF

Sonoma Co. Transit
sctransit.com

Santa Rosa CityBus
srcity.org/fares

Petaluma Transit
transit.cityofpetaluma.net

Marin Transit
marintransit.org

Tu boleto a la diversión
junio, julio y agosto
¡Los jóvenes K-12 viajan
GRATIS en transporte
público en Sonoma y
Marin!

El transporte público ofrece infinitas posibilidades para viajes divertidos este verano. Viajar en tren y autobús es una forma segura y confiable de moverse. ¡Empieza a planificar tus aventuras de verano ahora!

No se necesita pase, los pasajeros simplemente presentan una identificación emitida por la escuela o el gobierno. Identificaciones del semestre de primavera de 2023 están bien.

Rail Safety Information

In partnership with Operation Lifesaver California, SMART promotes messages that encourage safe behavior near tracks and trains (example shown in Figure 10 and 11). Rail safety materials are provided in English and Spanish and are available on SMART's website and at SMART's customer service desk. SMART prioritizes the need to enhance public awareness of what constitutes safe behavior around the active railroad right of way and has taken a proactive approach to convey rail safety information to the community.

Figure 10: SMART rail safety training materials, published in English and Spanish



Figure 11: Rail safety cards available on-board trains and at the SMART Customer Service Desk

THINK SAFETY FIRST.

- Never walk on the railroad tracks.
Walking on the tracks is illegal and dangerous.
- Stay behind the yellow strip on the platform before boarding and after exiting the train.
Always allow people to exit first, before you board.
- Drivers should never stop on the tracks.

FOR MORE RAILROAD SAFETY INFORMATION,
Visit BeTrackSMART.org
or call us at (707) 794-3330.



PIENSE PRIMERO EN LA SEGURIDAD.

- Nunca camine sobre las vías del tren.
Es ilegal y peligroso caminar sobre las vías.
- Manténgase detrás de la línea amarilla en la plataforma antes de abordar y después de salir del tren. Siempre permita que las personas salgan antes de abordar.
- Los conductores nunca deben detenerse en las vías.

Para más información de seguridad ferroviaria, conéctese a BeTrackSMART.org o llámenos al (707) 794-3330.



SMART’s Advisory Body Composition

The SMART Board approved a “Measure Q Expenditure Plan” in July 2008 as part of the ¼ cent sales tax ballot measure that was put before the voters. That sales tax measure was approved by nearly 70% of the voters in November 2008. The Measure Q Expenditure Plan included as a guideline for implementation of the plan that “A Citizens Oversight Committee will be established by the SMART Board to provide input and review on the Strategic Plan and subsequent updates”. The Strategic Plan is a document updated every five years, per Measure Q Expenditure Plan requirements. As a fixed route system, SMART is expected to draw passengers from throughout the counties of Marin and Sonoma, and as such the two combined counties constitute the District and SMART’s Service Area. Thus, the Citizen Oversight Committee is comprised of representatives from both counties.

Figure 12: 2023 Social Media Post advertising the open application period for interested Citizens Oversight Committee Members



In December 2022, the SMART Board approved the Citizen Oversight Committee (COC) bylaws¹ expanding the Committee’s role in reviewing and providing input on budgetary and financial matters, capital projects, and major strategic initiatives in addition to SMART’s five-year Strategic Plan. The adopted COC bylaws specified organizations eligible to nominate COC members, membership composition and eligibility, committee responsibilities and meeting frequency, and three-year member term limits. Following the adoption of the COC Bylaws, committee positions were advertised through a press release, email blast and social media posts. Local Community Based Organizations

1

https://sonomamarintrain.org/sites/default/files/Board/COC%20Documents/COC%20Bylaws_12.07.2022.pdf

(CBOs), many of which focus on serving minority populations, were informed of SMART’s COC recruitment through the communications channels mentioned above. An Ad-Hoc Committee was appointed to review the 43 COC applicants and recommend appointments to the SMART Board, which were approved in February 2023.

SMART’s current COC is comprised of nine members, whose terms commenced in 2023 and 2024. COC members at the time of plan submission include: Dani Sheehan-Meyer (Chair), Thomas Engdahl (Vice Chair), Lucy Dilworth, Sherry Adams, Kevin Hagerty, Zachary Kushel, Sandi McCubbin, Conor McCay, and Anthony Nachor.

Table 1: Minority Representation on the Citizens Advisory Committee

	Citizens Advisory Committee		SMART District (Sonoma & Marin Counties)	
Total	9	100%	748,921	100%
Male	5	56%	368,461	49.2%
Female	4	44%	380,460	50.8%
American Indian and Alaska Native	0	0%	6,331	0.8%
Asian	1	11%	38,236	5.1%
Black or African American	0	0%	13,813	1.8%
Native Hawaiian or other Pacific Islander	0	0%	2,035	0.3%
Some Other Race alone	0	0%	87,020	11.6%
Two or More Races	0	0%	78,734	10.5%
Minority Persons (sum of above)	-	0%	226,169	30.2%
Hispanic or Latino	0	0%	179,757	24.0%
White alone, not Hispanic or Latino	8	89%	522,752	69.8%

Source: American Community Survey (ACS) 2022 5-Year Estimates Data Profiles for Sonoma and Marin Counties.

Limited English Proficiency (LEP) Four Factor Analysis and Plan

Limited English Proficiency (LEP) Plan Overview

As part of SMART's responsibilities as a recipient of federal financial assistance, SMART is required to prepare a Limited English Proficiency (LEP) Plan to identify and address the needs of individuals with limited English proficiency. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, Federal Transit Administration Circular 4702.1B dated October 1, 2012, which state that no person shall be subjected to discrimination based on race, color, or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency indicates that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English.

To prepare the LEP Plan, SMART undertook the U.S. Department of Transportation (U.S. DOT) four- factor LEP analysis which considers the following factors:

- The number or proportion of LEP persons in the service area who may be served or are likely to encounter a SMART program, activity, or service
- The frequency with which LEP persons encounter SMART programs, activities, or services
- The nature and importance of programs, activities or services provided by SMART to the LEP population
- The resources available to SMART and overall cost to provide LEP assistance.

To complete the different analyses, SMART relied on 5-year American Community Survey Data for the years 2017 and 2022 as well as the Metropolitan Transportation Commission's 2023/2024 SMART Onboard Survey. A summary of the results of the SMART four-factor analysis is in the following section.

Four Factor Analyses

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by SMART

SMART's principal potential ridership consists of Marin County and Sonoma County residents. According to the American Communities Survey (ACS) data on languages spoken at home among the population over five years old, there is a lot of linguistic

diversity among residents of Marin and Sonoma Counties, but this diversity is captured by a small proportion of the overall population and is primarily concentrated among Spanish speakers. Minor population and demographic shifts have occurred within these groups between the two time points observed, 2017 and 2022. However, these population shifts have not resulted in significant changes in LEP speakers. See Table 2 for the language spoken at home for the total population above the age of 5 in Sonoma and Marin Counties in 2017 and 2022.

Table 2: Language Spoken at Home for the Population 5 Years and Over in SMART’s Service Area

	2017	2022	2017	2022	2017	2022
Language Spoken	Marin County	Marin County	Sonoma County	Sonoma County	Both Counties	Both Counties
Total Population	248,260	249,100	474,758	465,562	723,018	714,662
English Only	191,880	196,420	353,435	343,472	545,315	539,892
Spanish	31,867	27,820	93,718	94,726	125,585	122,546
French, Haitian, or Cajun	2,865	2,302	1,830	2,006	4,695	4,308
German or other West Germanic languages	2,655	2,344	2,613	2,191	5,268	4,535
Russian, Polish, or other Slavic languages	2,198	2,212	1,833	1,380	4,031	3,592
Other Indo-European languages	7,317	6,717	6,656	6,469	13,973	13,186
Korean	671	977	975	810	1,646	1,787
Chinese (incl. Mandarin, Cantonese)	2,527	2,766	3,020	2,894	5,547	5,660
Vietnamese	1,101	1,420	1,310	2,117	2,411	3,537
Tagalog (incl. Filipino)	1,525	1,061	2,413	3,261	3,938	4,322
Other Asian and Pacific Island languages	2,154	2,215	4,511	3,717	6,665	5,932
Arabic	369	899	747	997	1,116	1,896

Other and unspecified languages	1,131	1,947	1,697	1,522	2828	3469
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Source: American Community Survey, Table ID C16001, 2017 Five Year Estimate and 2022 Five Year Estimate

According to the 5-year ACS data for 2022, 71,715 individuals above the age of five are LEP speakers within the combined population of SMART’s District. The share of LEP speakers account for approximately 10% of Marin and Sonoma County residents above the age of 5. Among the languages surveyed, 7.6% of individuals across the two counties who identified as speaking English “not very well” speak Spanish at home. The other LEP individuals are speakers of languages that account for less than 1% of the total population, such as other Indo-European language speakers (0.5%), Chinese speakers (0.5%), Vietnamese speakers (0.3%), other Asian and Pacific Island language speakers (0.3%), Tagalog speakers (0.2%), and other and unspecified languages (0.2%). Table 3 shows the breakdown of the population in SMART’s District by language spoken at home and the share of LEP speakers by primary language spoken.

Table 3: Total Limited English Proficiency (LEP) Individuals and LEP Individuals as a Percent of the Total Population in SMART’s District

	Total for Both Counties	Number of LEP Language Speakers	Percent of the Total Population	Percent of LEP population
Total Population	714,662	71,715	10.0%	100%
Language Spoken at Home for the Population 5 Years and Over				
English Only	539,892	N/A	76%	N/A
Spanish	122,546	54,404	7.6%	76%
French, Haitian, or Cajun	4,308	418	0.1%	1%
German or other West Germanic languages	4,535	365	0.1%	1%
Russian, Polish, or other Slavic languages	3,592	1,002	0.1%	1%
Other Indo-European languages	13,186	3,699	0.5%	5%
Korean	1,787	950	0.1%	1%
Chinese (incl. Mandarin, Cantonese)	5,660	3,264	0.5%	5%
Vietnamese	3,537	1,998	0.3%	3%
Tagalog (incl. Filipino)	4,322	1,379	0.2%	2%

Other Asian and Pacific Island languages	5,932	2,134	0.3%	3%
Arabic	1,896	560	0.1%	1%
Other and unspecified languages	3,469	1,542	0.2%	2%

Source: American Community Survey, Table ID C16001, 2017 Five Year Estimate and 2022 Five Year Estimate

The Department of Transportation (DOT) has adopted the Department of Justice’s Safe Harbor Provision.

The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

Based on this above analysis of census data, SMART has determined that within the District boundaries LEP Spanish speakers meet the 5% population threshold, while LEP speakers of Chinese, Vietnamese, and Tagalog each meet the “safe harbor” language threshold of greater than 1,000 LEP individuals per federal guidelines. SMART is unable to determine if other LEP speakers identified in the census categories of Russian, Polish, or other Slavic languages, Other Indo-European languages, or Other Asian and Pacific Island languages also meet the 1,000 individual threshold, as SMART cannot disaggregate the individual languages within these census categories. Due to SMART’s large service area, the 1,000-person Safe Harbor threshold represents a very small percentage of the overall population, as is the case for Chinese (0.5%), Vietnamese (0.3%), and Tagalog (0.2%) LEP individuals.

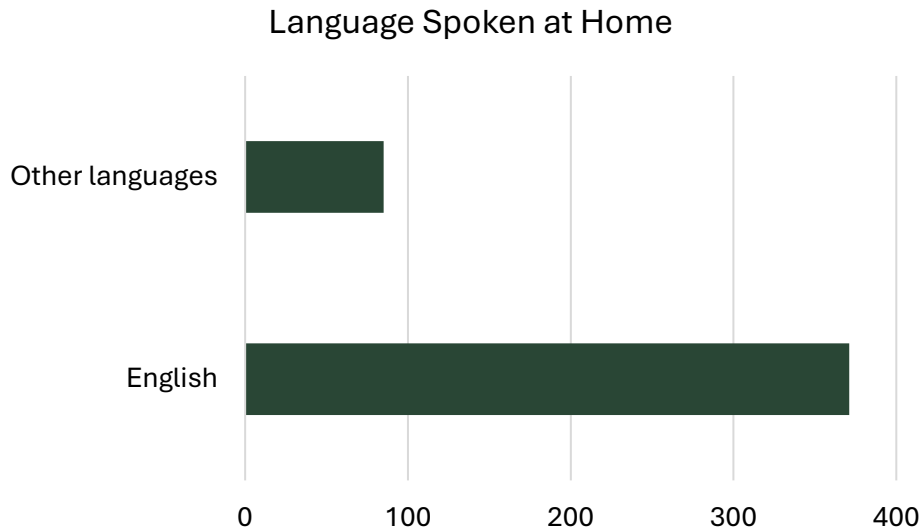
Given this determination, SMART will provide written translation of vital documents in Spanish, Chinese, Vietnamese, and Tagalog in accordance with the Safe Harbor Provision. Vital documents are defined on page 41.

Factor 2: The frequency with which LEP individuals encounter SMART

The Metropolitan Planning Organization (MPO) for SMART’s region is the Metropolitan Transportation Commission (MTC), and they conduct on-board surveys on behalf of transit

agencies in the Bay Area. The last survey conducted for SMART was completed between 2023 and 2024, and it found that 81.4% (371) of respondents spoke English at home while the other 18.6% (85) respondents reported speaking other languages at home (Figure 13).

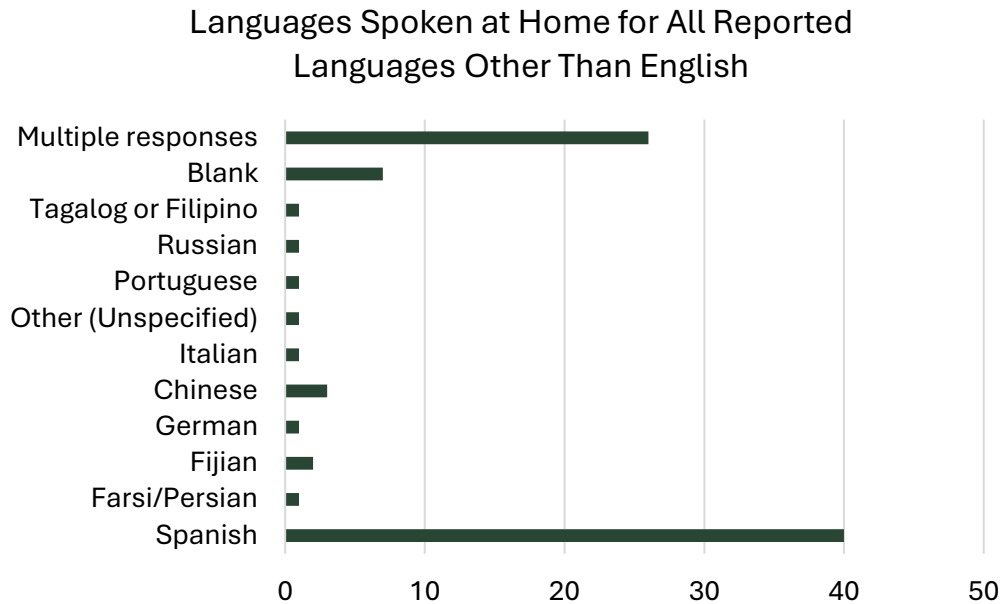
Figure 13: SMART Onboard survey respondents languages spoken at home



Source: 2023/2024 Onboard Survey, Question 15 Results

Of the languages spoken at home other than English, respondents reported speaking at home multiple languages, Spanish, Tagalog or Filipino, Russian, Portuguese, Italian, Chinese, German, Fijian, Farsi/Persian, other (unspecified) languages, or chose to leave the response blank (Figure 14).

Figure 14: Breakdown of Languages Spoken at Home Other than English



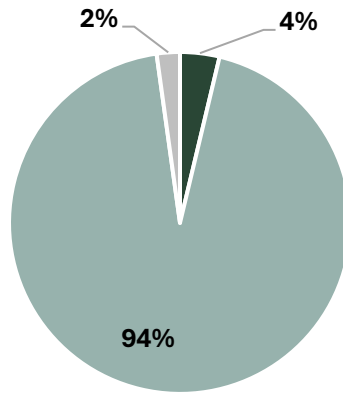
Source: 2023/2024 Onboard Survey, Question 15 Results

For all respondents, Spanish speakers made up 8.8%, 5.7% provided multiple responses, 1.5% did not respond to the question, 0.7% Chinese speakers, 0.4% Fijian speakers, and 0.2% Farsi/Persian, 0.2% Russian, 0.2% Portuguese, 0.2% Italian, 0.2% Tagalog or Filipino, 0.2% German, and 0.2% Other (unspecified).

For all respondents, 94% reported speaking English “very well” or “well”, 4% reported speaking English “not well” or “not at all”, and the other 2% either offered multiple responses or chose to not answer the question (Figure 15).

Figure 15: Onboard Survey Respondents Proficiency in English

Respondents Proficiency in English

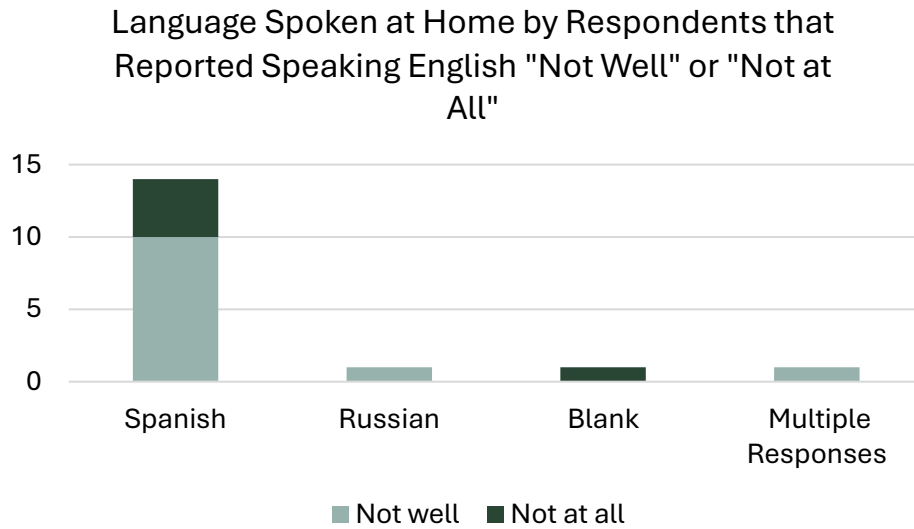


- Total respondents that speak English "not well" or "not at all"
- Total respondents that speak English "very well" or "well"
- Total respondents that provided "multiple responses" or did not answer

Source: 2023/2024 Onboard Survey, Question 16 Results

Among respondents that speak a language other than English at home, 51% reported speaking English “Very well”, 24% reported speaking English “well”, 14% reported speaking English “not well”, 6% reported speaking English “Not at all”, and the remaining 6% left the response blank. The majority of respondents that spoke English “not well” or “not at all” identified as Spanish speakers (Figure 16).

Figure 16: Language Breakdown for those Survey Respondents with Limited English Proficiency



Source: 2023/2024 Onboard Survey, Question 15 and 16 Results

The on-board survey results suggest that approximately 4% of SMART’s riders were determined to be LEP individuals (Figure 15). The onboard survey data indicate that LEP individuals do encounter SMART services, as one of main transit providers in Sonoma and Marin Counties. Among the LEP individuals identified through the census data analysis, LEP Spanish speakers have been found to frequently interact with SMART’s service according the MTC onboard survey results.

Factor 3: The nature and importance of SMART to people’s lives

As one of the main providers of public transit service in Sonoma and Marin Counties, SMART offers a critical service providing access to jobs, health care, education, and other destinations, particularly for individuals without access to a car. Additionally, SMART operates an active rail corridor that travels through and connects existing neighborhoods and communities, and in this way is part of the community fabric. For these reasons, SMART is especially important to the people that depend on it, and the communities that live around the corridor.

As an essential service, SMART strives to make it easy to access services and does not require compulsory activities such as filing applications, seeking consent, or conducting interviews. In special cases, however, such as customers purchasing prepaid fares, or requiring an application for special discount programs for seniors, persons with a disability, or youth, care will be taken to provide language assistance when needed. SMART participates in the regional Clipper Start program, which does require participants to

complete an application to secure the fare discount. The Clipper Start application is available in English, Spanish, Tagalog and Chinese.

Additionally, as an active rail corridor within existing neighborhoods, SMART takes seriously the need to enhance public awareness of what constitutes safe behavior around the active railroad right of way. SMART has taken a proactive approach to reach out to the community to convey a rail safety message and offers translations into Spanish and will provide language assistance to communicate rail safety to the public.

Factor 4: The resources available to SMART and costs associated with providing language services

Adequate resources are critical for successful LEP programs. Many costs associated with delivery of service to LEP individuals are already included in the daily cost of doing business in a diverse environment. To the extent they are not already included, SMART will endeavor to meet LEP service needs while managing costs to the extent possible.

The cost of providing language assistance has been minimized by ensuring the statistically significant language population has translated materials. Bilingual SMART staff and other languages are available through SMART's contracted services with LanguageLine Solutions, which provides on-demand interpretation in over 240 languages.

In the development of SMART's Clipper-enabled fare collection machines, all screen interfaces were translated into Spanish for both the visual screens and the audio recordings made available through the audio-jack function for Americans with Disabilities Act compliance.

LEP Plan/Language Assistance Plan (LAP)

SMART began operating full passenger service in August 2017. SMART's LEP Plan, first adopted in July 2015, was developed while SMART was exclusively in a construction phase without operating service. SMART developed the LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency that wish to access information about SMART's transit services, projects and programs. Modifications to the LEP services offered through SMART will occur over time as needed.

This plan outlines the ways in which assistance may be provided, staff training that may be required, and how to notify LEP people that assistance is available.

Language Assistance Measures

Based on the four-factor analysis and the “safe harbor” language guidelines, SMART has determined that vital documents will be translated into Spanish, Chinese, Vietnamese, and Tagalog. According to FTA guidance under C4702.1B, vital written documents include, but are not limited to, consent and complaint forms; intake and application forms with the potential for important consequences; written notices of rights; notices of denials, losses, or decreases in benefits or services; and notices advising LEP individuals of free language assistance services. Consistent with this guidance, SMART has identified the following vital documents for translation into Spanish, Chinese, Vietnamese and Tagalog:

- Title VI Notice
- Title VI Complaint Procedure
- Title VI Complaint Form
- Rail System Schedules.

As Spanish is the predominant language of LEP individuals in SMART’s District and Spanish speaking LEP individuals engage frequently with SMART services, SMART will continue to focus language assistance to Spanish speaking populations.

On occasion, informational pieces may be printed in a language other than English or Spanish, if needed in the target market or area being served. Additionally, where possible, SMART will utilize universal symbols to communicate information about accessing and using SMART services in order to eliminate barriers for LEP individuals.

SMART has a number of new initiatives that will enhance the information available for LEP individuals navigating SMART’s System. These initiatives include SMART’s expanded real-time train information signage project, expanded on-board and on-platform signage in English and Spanish, and SMART’s efforts in partnership with MTC of the implementation

Figure 17: SMART SMS Real-Time Information Sign

The graphic is a vertical stack of four informational panels. The top panel is dark teal with the SMART logo (SONOMA-MARIN AREA RAIL TRANSIT) and the text 'Where is my train? ¿Dónde está mi tren?'. The second panel is orange and white, titled 'Station Code / Código de Estación', and lists 'southbound to / hacia sur a Larkspur' with code '71132' and 'northbound to / hacia norte al Sonoma County Airport' with code '71131'. The third panel is dark teal, titled 'Ways to get train arrival: / Modos para saber tiempo de llegada:', and lists three methods: 'CALL or TEXT / LLAME o TEXTO' with phone number '707-200-6332', 'APP' with 'get notifications via app / reciba notificaciones por app' and a QR code for the 'Transit app', and 'WEB' with 'www.SonomaMarinTrain.org / realtime-mapping' and a QR code.

Figure 18: Fare tap machine with translation in Spanish and Chinese



of regional mapping and wayfinding. SMART will be installing e-ink real-time information signs with train arrival information. These signs will provide information in English and Spanish and will have an automated button to audibly convey the displayed message for those that are visually impaired. SMART recently conducted an audit of signage at stations and on-board to look at opportunities for expanded signage and information to support LEP individuals. SMART will be adding additional information in Spanish, the language that has a statistically significant LEP population in the District, on our system in 2025.

Lastly, SMART is supporting the MTC-lead regionwide mapping and wayfinding initiative being rolled out for all 27 transit agencies in the Bay Area, which aims to enhance wayfinding for people looking to access and connect between transit services in the region. These signs will include universal symbology, uniform information, and translated content. The initial materials will be launched at two SMART stations in FY25.

There are numerous language assistance measures available to LEP persons, including both oral and written language services. There are also ways in which SMART staff may respond to LEP persons, whether in person, by telephone or in writing. These include:

- Post the SMART Title VI Program Statement and LEP Plan on the agency website, www.sonomamarintrain.org, in English and Spanish.
- All public information meetings have a staff English-Spanish language translator on site.
- All information flyers, door hangers and letters to the public include Spanish Language translations.
- Use of Language Identification Flashcards Documentation of language assistance requests.
- Network with local human service organizations that provide services to LEP individuals and seek opportunities to provide information on SMART programs

and services, including Community Action Partnership of Sonoma County and Los Cien.

- Provide bilingual SMART staff at community events, public hearings, and Board of Directors meetings.
- Provide bilingual audio-visual fare machines.
- Placement of statements in notices and publications that interpreter services are available for these meetings, with two-day advance notice.
- Provide multilingual customer service through LanguageLine Solutions.
- Include language “Spanish a plus” on transit operator recruitment flyers and onboard recruitment posters.

Staff Training

Title VI Program and language access training is provided to SMART administrative and operations staff upon hire and periodically thereafter and includes the following:

- Information on the SMART Title VI Procedures and LEP responsibilities
Description of language assistance services offered to the public.
- Use of phone translation services via LanguageLine Solutions.
- How to handle a potential Title VI/LEP complaint.

From 2017-2020, SMART contracted with Golden Gate Transit for the provision of customer services including Call Center services in over 150 languages. In 2020, SMART assumed customer services with SMART staff; similar language access has been made available through LanguageLine Solutions, which provides on-demand interpretation in over 240 languages.

SMART currently employs 3 customer service positions, two of whom are bilingual in Spanish/English; in addition, customer service is supported as needed by administrative staff fluent in additional languages including French, Tagalog, Farsi, and Portuguese. SMART also offers a staff development program that allows staff to pursue work-related education, including language education as applicable to their position.

Outreach Techniques

When staff prepares a document or schedules a meeting where the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in the language of the known LEP population(s). Interpreters will be available as needed.

When presenting information at a public meeting, SMART makes available a Spanish Language translator upon request. All information flyers, door hangers and letters to the public include attached Spanish Language translation in the primary distribution format.

Monitoring and Updating the LEP Plan

SMART will update the LEP periodically as required by U.S. DOT. The update may include information regarding the following:

- The number of documented LEP person contacts encountered annually; how the needs of LEP persons have been addressed.
- The current LEP population in the SMART service area if the need for translation services has changed.
- If local language assistance programs have been effective and sufficient to meet the need.
- If SMART's financial resources are sufficient to fund the language assistance resources needed.
- A possible survey of train operators and other front-line staff, like dispatchers, administrative assistants, and planners, on their experience concerning any contacts with LEP persons.
- The extent to which SMART has complied with the goals of this LEP Plan.
- If complaints have been received concerning SMART's failure to meet the needs of LEP individuals.

Dissemination of the SMART LEP Plan

A link to the SMART LEP Plan and the Title VI Program Statement and Procedures is included on the SMART website at www.sonomamarintrain.org. Any person or agency with internet access will be able to access and download the plan from the SMART website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, email, or in person and shall be provided with a copy of the plan at no cost. LEP individuals may request copies of the plan to be provided in alternative languages and SMART will endeavor to fulfill those requests.

Subrecipient Oversight and Assistance with Title VI Compliance

Per FTA Circular 4702.1B, primary recipients of FTA funding, are required to detail within the Title VI program how subrecipients are complying with Title VI. SMART is a direct recipient and does not have any subrecipients it passes funding through to. Therefore, subrecipient compliance and oversight is not included in SMART's Title VI Program as it is not applicable.

Facility Site and Equity Analysis

Per FTA Circular 4702.1B, a recipient is required to include a copy of the Title VI equity analysis conducted during the planning stage for any facility constructed such as a vehicle storage facility, maintenance facility, operation center, etc. SMART has not constructed such a facility since the last Title VI Program Update.

Smart's Title VI Systemwide Standards and Service Policies

System-Wide Service Standards

SMART sets quantitative system-wide service standards to ensure equitable service across all jurisdictions and populations served by the SMART system. Service standards are established for several indicators including trip headways, vehicle load factors, schedule coverage, and on-time performance prevent discriminatory service designs and operations decisions.

System Configuration

SMART operates on a fixed guideway rail system, providing passenger service on one north-south route. SMART's rail alignment is primarily a single-track rail line, with siding areas for passing trains. Single-track rail systems can be subject to operational limitations. In 2022, SMART became the public short line freight rail operator on the rail corridor, having received Surface Transportation Board approval to assume common carrier responsibilities from the private freight operator on the corridor (June 11, 2021, Surface Transportation Board Docket 1310X). The legislation establishing the SMART District requires the continuance of short haul freight on the corridor, which SMART operates outside the hours of passenger service.

SMART's current rail car fleet consists of 18 rail cars. The train sets are currently comprised of an "A" and "B" cars combined into 2 and 3-car train sets. Platform lengths are designed for up to three car trains and provide for level boarding. SMART rail vehicles are divided into two age categories: The original cars and the additional cars. Fourteen of the cars are part of the original order. These are the same age and condition, having been manufactured and delivered between April 2015 and December 2015. Four additional cars were manufactured for delivery in late 2018 with deployment in Fall of 2019.

System-Wide Service Policies

SMART is required to adopt system-wide service policies necessary to guard against service design and operational policies that may have disparate impacts. System-wide policies differ from service standards in that they are not necessarily based on a quantitative threshold. All service policies will provide equitable service across all jurisdictions and populations served by the SMART system. All policies are subject to approval by the SMART Board.

Vehicle Assignment

Vehicle age and type are similar for all the vehicles in the fleet. SMART operates two-car train sets comprised of an "A" car and a "B" car. SMART can deploy the "A" and "B" cars

into two- and three-car train set configurations depending on rail car availability and passenger demand. All vehicles are assigned to the same route between Airport Boulevard and Larkspur. All rail cars comply with Americans with Disabilities Act (ADA) requirements, including wheelchair accessible spaces and level platform boarding.

Schedule

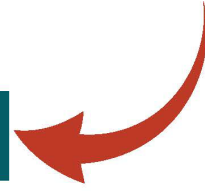
Since the start of passenger revenue service in August 2017, all stations receive the same level of rail service, with all trains consisting of two and three-car train sets and all trains stopping at all stations the same number of times per day and at the same headways. In 2022, SMART fully restored service to pre-COVID pandemic levels, with 19 southbound and 19 northbound trains on weekdays, with service hours from 4:39 a.m. to 10:05 p.m. Additionally, SMART fully restored and expanded weekend service levels compared to pre-COVID pandemic levels, operating weekend schedule on both Saturday and Sunday with 8-southbound and 8-northbound trains providing service from 7:16 a.m. to 8:57 p.m. In August 2024, SMART added two weekday trips, 2 southbound and 2 northbound, to offer additional morning and midday service, creating a total of 42 weekday trips.

Figure 18: SMART's Train Schedule Effective August 12, 2024, includes 21 Southbound and 21 Northbound Weekday Trips and 8 Southbound and 8 Northbound Weekend Trips. Published in English and Spanish.



Train Schedule effective Monday, August 12, 2024
Horario de Trenes en efecto el 12 de agosto del 2024

NEW schedule with expanded weekday service facilitating school commutes and midday travel!
 ¡Nuevo horario con mas servicio entre semana facilitando viajes a escuelas y los viajes al mediodía!



SOUTHBOUND WEEKDAYS - Sonoma County Airport to Larkspur DIRECCIÓN SUR EN DIAS LABORALES - Aeropuerto del Condado de Sonoma a Larkspur	
Trip Number/Viaje de Tren	1 3 NEW 7 9 11 13 15 17 19 NEW 23 25 27 29 31 33 35 37 39 41
Sonoma County Airport	439 502 534 606 638 710 742 814 918 1022 1054 1245 117 221 253 325 357 501 533 605 709
Santa Rosa North	446 509 541 613 645 717 749 821 925 1029 1101 1252 124 228 300 332 404 508 540 612 716
Santa Rosa Downtown	450 513 545 617 649 721 753 825 929 1033 1105 1256 128 232 304 336 408 512 544 616 720
Rohnert Park	458 521 553 625 657 729 801 833 937 1041 1113 1262 136 240 312 344 416 520 552 624 728
Cotati	501 524 556 628 700 732 804 836 940 1044 1116 1267 139 243 315 347 419 523 555 627 731
Petaluma Downtown	516 539 611 643 715 747 819 851 955 1059 1131 1272 154 258 330 402 434 538 610 682 786
Novato San Marin	528 551 623 655 727 759 831 903 1007 1111 1183 134 206 310 342 414 446 550 622 654 758
Novato Downtown	531 554 626 658 730 802 834 906 1010 1114 1186 137 209 313 345 417 449 553 625 657 801
Novato Hamilton	539 602 634 706 738 810 842 914 1018 1122 1194 145 217 321 353 425 457 601 633 705 809
Marin Civic Center	545 608 640 712 744 816 848 920 1024 1128 1200 151 223 327 359 431 503 607 639 711 815
San Rafael	551 614 646 718 750 822 854 926 1030 1134 1206 157 229 333 405 437 509 613 645 717 821
Larkspur	558 621 653 725 757 829 901 933 1037 1141 1213 204 236 340 412 444 516 620 652 724 828

SOUTHBOUND WEEKENDS & HOLIDAYS DIRECCIÓN SUR en Fin de Semana y Dias Festivos	
Trip Number / Viaje de Tren	1 3 5 7 9 11 13 15
Sonoma County Airport	716 821 932 1131 1227 245 422 600
Santa Rosa North	723 828 939 1138 1234 252 429 607
Santa Rosa Downtown	727 832 943 1142 1238 256 433 611
Rohnert Park	735 840 951 1150 1246 304 441 619
Cotati	738 843 954 1153 1249 307 444 622
Petaluma Downtown	753 858 1009 1208 1304 322 459 637
Novato San Marin	805 910 1021 1220 116 334 511 649
Novato Downtown	808 913 1024 1223 119 337 514 652
Novato Hamilton	816 921 1032 1231 127 345 522 700
Marin Civic Center	828 927 1038 1237 133 351 528 706
San Rafael	828 933 1044 1243 139 357 534 712
Larkspur	835 940 1051 1250 146 404 541 719

NORTHBOUND WEEKDAYS - Larkspur to Sonoma County Airport DIRECCIÓN NORTE EN DIAS LABORALES - Larkspur al Aeropuerto del Condado de Sonoma	
Trip Number/Viaje de Tren	2 4 NEW 8 10 12 14 16 18 NEW 22 24 26 28 30 32 34 36 38 40 42
Larkspur	608 640 712 744 816 920 1056 1215 1247 223 255 327 359 431 503 535 639 711 743 850
San Rafael	615 647 719 751 823 927 959 1103 1222 1254 230 302 334 406 438 510 542 646 718 750 857
Marin Civic Center	620 652 724 756 828 932 1004 1108 1227 1259 235 307 339 411 443 515 547 651 723 755 902
Novato Hamilton	626 658 730 802 834 938 1010 1114 1233 105 241 313 345 417 449 521 553 657 729 801 908
Novato Downtown	632 704 736 808 840 944 1016 1120 1239 111 247 319 351 423 455 527 559 703 735 807 914
Novato San Marin	635 707 739 811 843 947 1019 1123 1242 114 250 322 354 426 458 530 602 706 738 810 917
Petaluma Downtown	648 720 752 824 856 1000 1032 1136 1255 127 303 335 407 439 511 543 615 719 751 823 930
Cotati	701 733 805 837 909 1013 1045 1149 108 140 316 348 420 452 524 556 628 732 804 836 943
Rohnert Park	705 737 809 841 913 1017 1049 1153 112 144 320 352 424 456 528 600 632 736 808 840 947
Santa Rosa Downtown	713 745 817 849 921 1025 1057 1201 120 152 328 400 432 504 536 608 640 744 816 848 955
Santa Rosa North	717 749 821 853 925 1029 1101 1205 124 156 332 404 436 508 540 612 644 748 820 852 959
Sonoma County Airport	723 755 827 859 931 1035 1107 1211 130 202 338 410 442 514 546 618 650 754 826 858 1005

NORTHBOUND WEEKENDS & HOLIDAYS DIRECCIÓN NORTE en Fin de Semana y Dias Festivos	
Trip Number / Viaje de Tren	2 4 6 8 10 12 14 16
Larkspur	930 1036 1130 1300 245 423 600 740
San Rafael	938 1044 1138 1308 253 431 608 748
Marin Civic Center	943 1049 1143 113 258 436 613 753
Novato Hamilton	950 1056 1150 120 305 443 620 800
Novato Downtown	955 1102 1156 126 311 449 626 806
Novato San Marin	959 1105 1159 129 314 452 629 809
Petaluma Downtown	1012 1118 1212 142 327 505 642 822
Cotati	1025 1131 1225 155 340 518 655 835
Rohnert Park	1029 1135 1229 159 344 522 659 839
Santa Rosa Downtown	1037 1143 1237 207 352 530 707 847
Santa Rosa North	1041 1147 1241 211 356 534 711 851
Sonoma County Airport	1047 1153 1247 217 402 540 717 857

Customer Service/Servicio al Cliente: 707-794-3330 Website/ Sitio web: SonomaMarinTrain.org

*Note: the Golden Gate Larkspur Ferry schedule changes periodically, visit www.goldengate.org/ferry for the current schedule.
 * Nota: el horario del ferry de Golden Gate en Larkspur cambia periódicamente, visite www.goldengate.org/ferry para ver el horario actual.

Any changes to service are carefully evaluated to maintain equitable levels of service for all communities served by SMART.

Vehicle Headways

Vehicle headways range from every 32-101 minutes in each direction during the weekday service, five days a week. On the weekends, service operates every 54-138 minutes.

Vehicle Load

SMART's Vehicle Load Standard of 2 is the same for peak and off-peak services. This standard is the anticipated maximum load factor of the fleet based on total seated capacity and the vehicle manufacturer-stated standing capacity, target the anticipated maximum load factor of the fleet, or 2. The average of all loads during the peak operating period should not exceed the train's anticipated achievable capacities, which are 145 persons each for both A and B car types.

In 2022, SMART removed six seats per car to add bicycle storage capacity on board the trains, after numerous requests from passengers. Each train car has 73 seats. A two-car train set (A + B) is estimated to accommodate 146 seated passengers per train set, and up to 290 passengers with standees. All SMART station platforms are constructed to handle up to three car lengths. A full three car train has an anticipated capacity of 435 people. The total train capacity per car is 145, establishing a load factor of 2 or 1.98. SMART may revise its Vehicle Load Standard over time based on assessed travel demand and operating scenarios.

Table 4: Vehicle Load Policy

Car Type	Seated Capacity	Standing Capacity	Total Capacity	Maximum Load Factor
A	73	72	145	1.98
B	73	72	145	1.98

On-time Performance

A train is determined to be on-time if it reaches its destination within five minutes of the published schedule time. SMART does not permit its trains to depart early. It is SMART’s goal to have 95 percent of trains meet these on-time performance criteria. From the inception of service in 2017 to July 2021, SMART measured on-time performance based on arrival at the end destination of the trip. As of July 2021, the District tracks on-time performance on a station-by-station basis, conforming to industry standards.

Table 5: Fiscal Year On-time Performance FY22-FY25 to-date

Fiscal Year	Average On-time Performance
FY22	89.3%
FY23	97.6%
FY24	97.5%
FY25 to-date	96.6%

Service Availability

Service availability is described by the October 2012 FTA Circular 4702.1B:

Service availability is a general measure of the distribution of routes within a transit provider's service area...A standard might also indicate the maximum distance between stops or stations...Commuter rail service or passenger ferry service availability standards might include a threshold of residents within a certain driving distance as well as within walking distance of the stations or access to the terminal.

SMART operates a fixed guideway system. According to the 2020 Census, 66% of all the residents in Marin and Sonoma Counties (the SMART District) are within 3 miles of a SMART station. In addition, 64% of all jobs are within 3 miles of a SMART station (LEHD 2020). SMART coordinates with local jurisdictions to encourage land use policies that encourage jobs and housing near the SMART stations.

Table 6: Service Availability

	Total Population	Total Housing Units	Total Jobs
SMART District	743,183	316,306	290,831
Stations - 3 miles	490,937	195,393	185,061
Stations - 1 mile	224,106	92,260	70,007
Stations - 0.5 miles	124,988	50,506	26,717
	Percent of Population	Percent of Housing Units	Percent of Jobs
SMART District	100.0%	100.0%	100.0%
Stations - 3 miles	66%	62%	64%
Stations - 1 mile	30%	29%	24%
Stations - 0.5 miles	17%	16%	9%
<i>Source:</i>	<i>Census 2020</i>	<i>Census 2020</i>	<i>LEHD 2020</i>

Transit Amenities and Amenities Policy

According to the October 2012 FTA Circular 4702.1B:

Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Fixed route transit providers must set a policy to ensure

equitable distribution of transit amenities across the system. Transit providers may have different policies for the different modes of service that they provide. Policies in this area address how these amenities are distributed within a transit system, and the manner of their distribution determines whether transit users have equal access to these amenities. This subparagraph is not intended to impact funding decisions for transit amenities. Rather, this subparagraph applies after a transit provider has decided to fund an amenity.

SMART provides a variety of amenities at stations to attract and retain customers. These packages of station amenities are uniform throughout the SMART system. Generally, SMART has two types of station environments, Downtown and Other, with downtown stations located in higher density, mixed land use neighborhoods. Examples of these Downtown stations are SMART's Downtown San Rafael station and the Downtown Santa Rosa Station located in Santa Rosa's Railroad Square. Station platforms themselves are uniformly designed, with platform height designed to allow for level boarding onto the rail vehicles.

The basic set of amenities exists at all stations and includes bike racks, shelters/canopies, benches, and trash cans. In general, station amenities have been designed with local jurisdiction input and are uniform except for minor features (such as color) as requested and/or funded by local jurisdictions. SMART's fare collection system is the Metropolitan Transportation Commission (MTC) regional Clipper® smart card and mobile app fare system supplemented with a SMART-specific mobile payment system. Clipper® validation equipment and ticket vending machines are located at SMART stations as procured and installed by the regional Clipper® program contractor with one machine per station platform. SMART provides standard customer information across each of the stations and will coordinate with regional MTC wayfinding and signage standards in further implementation of a station customer information program. In addition, SMART has installed a minimum of one block of four electronic bicycle lockers at each SMART station, either on SMART property or adjacent to the station on property owned by others. SMART conducted a State-funded bicycle parking plan to attempt to determine bicycle parking demand in advance of the actual start of SMART commuter rail system. Usage of these lockers at each SMART station is monitored to determine whether additional electronic lockers or other more intensive bicycle parking equipment is warranted. These standardized station amenities as described are included in the definition of basic amenities.

SMART's Station Amenities Policy maintains that the installation of transit amenities along SMART's rail route is based on the needs of each individual station, with standardized amenities described above assembled into a Basic Amenities package. All station amenities are distributed equally among stations and all on-board amenities are distributed equally among all vehicles.

Requirement to Evaluate Service and Fare Changes

Because SMART does not operate 50 or more fixed route vehicles in peak service, it is not required to evaluate significant system-wide service and fare changes to determine whether those changes will have a discriminatory impact. SMART does maintain a policy of bringing a major service change to the public for comment and SMART Board of Directors for approval at a meeting of the SMART Board of Directors. See page 52 for SMART's Fare Increase and Major Service Change Policy.

While not required of SMART, SMART is aware of FTA Title VI requirements and endeavors to bear in mind the intent of the regulation to not create disparate impacts on the basis of race, color or national origin when updating this Title VI Program and when evaluating fare and service policies and practices. In 2015 and 2016 SMART conferred with FTA staff to ensure that the public process undertaken for the adoption of the District's first fare program would be sufficient to meet Title VI guidelines. That fare program included the structure and pricing of the future system expansions, including the Larkspur/Downtown Novato expansion of 2019, the current Windsor and other future northern extensions, and the future infill station in Petaluma.

Since then, SMART has made a series of modifications to the SMART fare program, which include:

- Participation in the regional pilot Means Base Fare Program, or Clipper START,
- Post-pandemic fare reduction,
- The Summer 2023 youth ride free limited promotion offered in coordination with all other North Bay Area local transit providers, and
- SMART's Youth and Seniors Ride Free Pilot Program from April 1, 2024 through June 30, 2025.

The following sections provide additional information regarding the modifications to SMART's fare program:

Clipper START

The Clipper START program allows adults ages 19-64 living in the Bay Area who have a household income of 200% or less of the federal poverty level to receive single ride discounts of 20% or 50% on 21 transit operators. The SMART Board adopted a pilot Low Income fare discount of 50% and the Metropolitan Transportation Commission, the regional manager of the Clipper system, implemented Clipper START on SMART at the end of November 2020.

SMART's Post-Pandemic Fare Reduction

To create a public incentive to ride SMART as the community emerged from the COVID-19 pandemic SMART implemented a pilot fare reduction program. In May 2021, SMART kicked off its Welcome Back campaign with reduced fares available on the SMART e-Tickets app. In September 2021, the reduced fares became

available on Clipper, the regional payment system. These promotional fares offered riders over 40% off the fare price, and were set to run through fiscal year 2022; however, the SMART Board has extended these reduced fares through June 30, 2025.

Youth Ride Free Summer 2023 Program

SMART along with Marin Transit, Sonoma County Transit, Santa Rosa CityBus, and Petaluma Transit offered free rides for K-12 youth throughout the summer 2023 season as part of the Summer Youth Ride Free Program. The program aimed to provide youth with a safe, affordable, and reliable way to get around Sonoma and Marin counties during the summer holiday.

Youth and Seniors Ride Free Pilot Program

Beginning April 1, 2024, youth (ages 0-18) and seniors (ages 65+), may board any SMART train, any day of the week and ride fare free. SMART's Free Fare initiative aims to provide economic and recreational opportunities to this underserved demographic while cultivating habits of utilizing sustainable transportation options.

Fare Increase and Major Service Change Policy

SMART's Consistent with SMART's Public Participation Plan and FTA Circular 9030.1E, it is SMART's policy to solicit public opinion and consider public comment before raising fares or implementing a major service change.

Receipt of public comment at a scheduled SMART Board of Directors meeting is required prior to implementation of a fare increase or a major service change. A "major" service change is defined as a modification that affects 25% or more of revenue hours or 25% or more of trips, with the change occurring over any 24-month period. Additional strategies, such as public meetings or other outreach to affected individuals, will be implemented as appropriate to solicit public comment for consideration in advance of receiving public comment at a SMART Board of Directors meeting.

Public comments received will be compiled and considered prior to finalizing the staff recommendation to the SMART Board of Directors regarding a fare increase or major service change. A summary of the public comments received will be provided as part of the staff report submitted to SMART Board of Directors regarding the fare increase or major service change in question.

The public comment opportunity scheduled as part of a SMART Board of Directors meeting as well as any additional outreach efforts, will be advertised broadly through SMART's website, the SMART mailing list, electronic and social media channels, and may include posters and flyers on the SMART vehicles and platforms, as appropriate. Notices regarding the public comment opportunity will be provided in both English and Spanish.

The public comment opportunity will consist of a staff report before the SMART Board of Directors, followed by public testimony.

Requirement to Monitor Transit Service

Because SMART does not operate 50 or more fixed route vehicles in peak service, it is not required to have a monitoring program of services standards and policies per FTA Circular 4702.1B. SMART does endeavor, however, to undertake periodic system-wide service monitoring activities to compare the level and quality of service provided relative to their system-wide service standards and service policies (i.e., vehicle load, vehicle assignment, transit amenities, etc.). Table 7 details the metrics, as reported in SMART’s FY24-FY25 budget, that SMART currently tracks on an annual basis.

Table 7: SMART FY24-25 Budget National Transit Database (NTD) Metrics

NTD Metrics	2019	2020	2021	2022	2023
Boardings	716,847	567,103	122,849	354,328	640,099
Vehicle Revenue Miles	923,002	821,415	398,291	679,245	974,479
Passenger Miles	18,371,183	13,516,234	3,148,345	7,855,912	13,922,153
Operating Expense	\$ 27,490,190	\$ 28,757,008	\$ 24,833,822	\$ 27,834,598	\$ 30,585,066
Operating Cost per Vehicle Revenue Mile	\$ 29.78	\$ 35.01	\$ 62.35	\$ 40.98	\$ 31.39
Operating Cost per Passenger Mile	\$ 1.50	\$ 2.13	\$ 7.89	\$ 3.54	\$ 2.20
Passenger Trips per Vehicle Revenue Mile	0.8	0.7	0.3	0.5	0.7
Investment Per Passenger Mile (IPPM) = (Cost - Fare/ Passenger Miles)	\$ 1.27	\$ 1.90	\$ 7.66	\$ 3.38	\$ 2.07
Fare Revenues	\$ 4,094,540	\$ 3,090,457	\$ 706,938	\$ 1,283,112	\$ 1,800,747
Farebox Recovery (Fare Revenues/Operating Expense)	15%	11%	3%	5%	6%
Average Fare (Fares/ Boardings)	\$ 5.71	\$ 5.45	\$ 5.75	\$ 3.62	\$ 2.81
Cost per Boarding (Operating Expense/ Boardings)	\$ 38.35	\$ 50.71	\$ 202.15	\$ 78.56	\$ 47.78
Subsidy per Boarding [(Cost - Fare)/ Boardings]	\$ 32.64	\$ 45.00	\$ 196.39	\$ 74.93	\$ 44.97

APPENDIX A: SMART's Civil Rights Complaint Form for Title VI and ADA Complaints

(Please see the next page)



Civil Rights Complaint Form
(Title VI and ADA/§504 Complaints)

Section I:

Name: Telephone (Home/Cell):
 Address: Telephone (Work/Other):
 Email Address:
 Accessible Format Requirements: Large Print Audio Tape
 IDD Other:

Section II:

Are you filing this complaint on your own behalf? Yes* No

*If you answered "yes" to this question, go to **Section III**.

If not, please supply the name and relationship of the person for whom you are complaining:

Please explain why you have filed for a third party

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. Yes No

Section III:

Title VI Complaint ADA/§504 Complaint

I believe the discrimination I experienced was based on (check all that apply):

Race Color National Origin Disability Other

Date and time of Alleged Discrimination (Month, Day, Year)

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved, include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please attach additional page(s) to this form.

Section IV

Have you previously filed a Title VI/ ADA complaint with this agency? Yes No

Section V

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? Yes No

If Yes, check all that apply:

Federal Agency

State Agency

Federal Court

Local Agency

State Court

Please provide information about a contact person at the agency/court where the complaint was filed:

Name:

Title:

Agency:

Address:

Telephone Number:

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

Signature and date required below:

Signature

Date

Signature (of person assisting complainant, if needed)

Date

Please submit this form in person at either address below, or mail, email or fax this form to:

SMART - Attn: Title VI Coordinator
5401 Old Redwood Highway, Suite 200
Petaluma, CA 94954
Phone: 707-794-3330
Fax: (707) 794-3037 (Attn: SMART Title VI Coordinator)
Email: TitleVI@sonomamarintrain.org (include "Title VI Complaint" in the subject line)

APPENDIX B: Public Participation Plan (PPP)

Public Participation Plan Overview

SMART's Public Participation Plan (PPP) guides the District's community engagement and public outreach efforts taken to solicit input from the public and communicate information about SMART's services, projects, policies and programs. The purpose of the PPP is to outline the ways in which SMART conducts public engagement and encourages community participation to inform SMART's service planning, capital projects, planning and design projects, policies, and programs.

This plan outlines SMART's goals for public engagement, the means and methods for engaging and communicating with the public, and measures SMART employs to reduce common barriers that typically limit public participation, including language barriers.

Public Engagement Goals

SMART's role in Sonoma and Marin Counties is multifaceted and includes responsibilities of:

- **Transit Service Provider:** SMART is one of the primary transit service providers, serving as the transit backbone in Sonoma and Marin Counties.
- **Short-line Freight Operator:** SMART is responsible for the short-line freight operations having assumed the common carrier responsibilities in 2022.
- **Transportation Construction Authority:** SMART is responsible for constructing transit facilities in Sonoma and Marin including SMART's rail system and the multi-use bicycle and pedestrian pathway network.
- **Special District and Sales Tax Authority:** State legislation created SMART as a Special District and voter-approval established the District as a Sale Tax Authority.

To effectively fulfill these roles, SMART endeavors to engage the public in order to:

- Guide and inform SMART's decision-making;
- Educate and inform the public of SMART's services, policies, programs, and activities;
- Provide transparency around the District's operations, budgetary actions, strategic planning efforts, and sales tax oversight; and
- Foster equitable and easily accessible opportunities for all seeking to engage with SMART and utilize services.

Public Engagement Means and Methods

SMART Board of Directors

SMART is governed by a 12-member Board consisting of elected and appointed officials selected as specified by AB 2224: two county supervisors each from Marin and Sonoma counties, three appointed City Council members from each county and two representatives from the Golden Gate Bridge District. The SMART Board of Directors holds regularly scheduled monthly meetings, typically held on the third Wednesday of every month. These meetings are open to the public in compliance with the Brown Act. Meeting agendas are publicly available no less than 72 hours prior to the meeting, meetings are commenced, and actions of the Board are only taken when there is a quorum of Board Members present. SMART strives to allow for meaningful public participation in the Board of Director's Meetings through the following:

- SMART provides a number of ways to attend or participate in the meeting, either in-person at SMART's offices located at 5401 Old Redwood Highway in Petaluma or remotely via Zoom teleconference or online webcast options.
- The public can review agenda items, which are posted no less than 72 hours prior to the meeting. Additionally, archived recordings of prior meetings, meeting minutes, staff reports and presentations are all available online: <https://www.sonomamarintrain.org/bod>.
- Meeting recordings are made available to the public at <https://www.sonomamarintrain.org/meetings>.
- The public can provide comments on specific items and general comments can be made before and during the meeting, in a written form or verbally, online, over the phone or in-person.
- SMART will provide written agenda materials in appropriate alternative formats, disability-related modifications or other accommodations such as translation, to enable individuals to participate in and provide comments at/related to public meetings upon request; requests must be submitted no less than two days prior to the meeting.

Community Relations and Outreach

In addition to the SMART Board of Directors, which takes public comment at all its regular meetings, SMART has convened ad hoc committees and workshops open to the public. These include the ongoing Citizens Oversight Committee and several ad-hoc workshops created for input on specific topics. These have played an important role in formulating SMART's policies and services.

Citizens Oversight Committee

The Measure Q Expenditure Plan requires the Citizens Oversight Committee as part of its Implementing Guidelines, specifically:

“A Citizens Oversight Committee will be established by the SMART Board to provide input and review on the Strategic Plan and subsequent updates.”

The plan goes on to state that:

“SMART will prepare a Strategic Plan, based on the commitments in this Expenditure Plan, prior to July 2009. The Strategic Plan will identify planned investments in capital implementation, operations and maintenance for the duration of the tax. The Strategic Plan will be updated at least every five years and approved by the SMART Board of Directors. The Strategic Plan will be developed with input from the public and the Citizens Oversight Committee.”

Ad-Hoc Advisory Committees/Workshops

The SMART Board has created ad-hoc committees to provide timely advice on a number of topics. On occasion, these ad-hoc committees include public workshops and meetings to gather input. One example of such a process was when the SMART Board decided to conduct workshops rather than create a Board Ad-Hoc Vehicle Advisory Committee. Public workshops and meetings were held to gather input regarding such issues as seating configurations, bicycle storage and other on-board amenities. A similar workshop process was created regarding input on stations. To encourage broad public participation on station design issues, SMART scheduled a series of public workshops in every community along the rail corridor to solicit input regarding the system’s 16 current and planned rail stations.

In January 2024, SMART formally began the process of updating the 2019 Strategic Plan. The main task of the Strategic Plan is to assist the District and its policy-making Board in the decisions needed to guide SMART’s investments and success into the future. Public workshops are one of the methods SMART uses to facilitate public input and engagement.

Listening Sessions

Staying in tune to community needs and concerns has allowed SMART to make operational and policy decisions that support the needs and desires of the public. In recent years, SMART has hosted a series of listening sessions to hear from members of the public on SMART’s strategic priorities including rail ridership, rail system expansion, pathway improvements, and freight operations. Listening sessions in 2020 and 2022 have helped inform agency decision-making, including efforts to improve bike storage on board trains, install pathway wayfinding, and provide real-time trip information. In 2024, SMART conducted online and in-person strategic planning workshops to support SMART’s Strategic Plan Update.

Community Engagement and Meetings

SMART has a regional footprint that includes many local communities, with a rail and pathway corridor that travels through and connects these communities. To ensure SMART is responsive to community needs and help to advance community goals, SMART meets

with the jurisdictions it serves to hear directly from the community and its representatives. SMART does so by co-hosting community meetings with local jurisdictions or presenting at local city council or subcommittee meetings.

Surveys

SMART conducts focused surveys in order to solicit specific input on projects, services and programs. Surveys are typically conducted online, but may have an in-person option, in the case of an intercept or on-board survey.

Direct Community Outreach

SMART regularly tables at local community events throughout the two counties, allowing the agency to disperse riders guide brochures, schedules, discount fare program brochures, and other information about SMART. These booths are staffed by bilingual employees and provide an opportunity for members of the public to become familiar with SMART services and ask questions and get answers on the spot regarding SMART's services, policies, and programs.

Stakeholder Outreach

SMART seeks to foster and maintain regular dialogue with stakeholders in the community including Community Based Organizations (CBOs), schools and educational institutions, businesses and employers, and others to identify ways SMART can most effectively meet the needs of these groups and the populations they represent. This outreach most typically involves community presentations to a diverse range of community and educational groups including:

- Civic clubs (e.g., Rotary Club, Kiwanis Club, Sons in Retirement, Active 20/30 Club);
- Community interest groups (e.g., Municipal Chambers of Commerce, Latino Chambers of Commerce, Latino advocacy groups and retired persons clubs);
- Religious organization (e.g., church and synagogue groups);
- School organizations (classes and public events, with emphasis on Rail Safety Education); and
- Community-based organizations.

Regional Partner Engagement

SMART staff are active in several regional committees related to delivering transit service and regional planning. Participation in these groups and committees allows SMART and other meeting participants to coordinate transit service, align planning efforts, and support shared objectives.

Project-Specific Community Engagement and Construction Notices

For SMART projects that are directly located within a specific area, SMART directly engages the relevant jurisdiction, their communities, and the specific neighborhoods. For

construction outreach, SMART follows a SMART Construction Notification Protocol (ATTACHMENT A to this PPP), including distribution of notices and door hangars. A construction information hot-line (855-312-7444) is provided for people to call with questions or comments related to construction activities.

Customer Service and Emergency Contacts

SMART maintains a number of ways for the public to reach the agency to get support, answers to questions, or to notify SMART of concerns, complaints or issues.

SMART's Customer Service Center can be reached via email at customerservice@sonomamarintrain.org, or via phone by dialing (707) 794-3330 or 511, 8 a.m. to 5 p.m. weekdays, except for those holidays in which SMART does not operate service. SMART Customer Service provides support to customers and responds to concerns and complaints.

For emergencies on the tracks or at grade crossings, SMART provides a toll-free number, (888) 412-3330 for direct access to dispatch support.

Customer Communication for Service delays or Interruptions

SMART offers text-based communications to passengers when train service is delayed or interrupted. Passengers can receive this information by texting the word SMART to 888777.

Digital and Print Materials

Website

SMART's website offers a centralized location for all the information related to SMART's services, programs, projects and policies. Website visitors can locate information on the SMART system, schedule, fares, station and station amenities, a rider's guide, SMART's code of conduct, and other policies. The website also includes SMART's Title VI and Civil Rights Program, Title VI complaint form, customer service and emergency contacts. The most up-to-date project and program information is located on the website, including construction notices. Upcoming and past Board Meeting Agendas and materials can be viewed through the website.

SMART Phone Applications and Alerts

SMART offers a variety of mobile phone applications compatible with Android and IOS that allow the public to access information and utilize SMART services. SMART applications include SMART's own E-ticket app, ParkMobile for SMART customers parking overnight, RidePingo for SMART's microtransit shuttle service, and Nixle service alert notifications. SMART also provides data to online trip planning services such as Google Maps, Apple Maps, and the Transit App.

Printed Materials

SMART produces printed materials including schedules and riders guide brochures which are regularly updated in line with service changes. Other informational print materials are prepared and provided to help inform the public about rail safety, SMART initiatives, and programs as necessary.

E-newsletter

SMART distributes a monthly e-newsletter and issues media alerts/press releases to a mailing list of 10,540 subscribers. Any member of the public can subscribe to receive these communications. SMART also distributes newsletters focused on construction updates for neighborhoods in which construction activities are occurring.

Social Media

SMART is active on social media platforms including Instagram, Facebook, and Youtube.

The public can connect with SMART via social media through the following:

Youtube: @sonoma-marinarearailtransi4895

Instagram: @sonomamarintrain

Facebook: <https://www.facebook.com/sonomamarintrain>

Strategies to Reduce Barriers

Geographic Barriers

The SMART District encompasses over 2,400 square miles. In an effort to minimize geographic barriers to access and participation, SMART operates its Customer Service Desk and hosts Board Meetings and other hearings at the District's Administrative Offices in Petaluma, which is approximately midway between the northernmost and southernmost bounds of the District. Additionally, since the COVID-19 Pandemic, SMART has adopted a hybrid meeting approach offering webcast and teleconference participation options to reduce possible geographic barriers that would limit the public's access to resources and participation in opportunities provided by SMART.

Language Barriers

SMART completes a Limited English Proficiency (LEP) four-factor analyses with each Title VI Program update to determine the thresholds of LEP individuals that live in SMART's District and interact with SMART and the services it provides. The analyses are used to the agency to best calibrate its language assistance measures in order to meet the needs of LEP individuals. The four factor analyses completed as part of SMART's 2024 Title VI Program found language other than English having a statistically significant population of LEP speakers is Spanish. In order to mitigate language barriers, SMART translates vital

information and materials related to accessing SMART services, provides bilingual support through our customer service desk, and provides the option for additional translation services upon request made possible with LanguageLine Solutions.

Track and Grade Crossing Construction Notification Protocols

Summary:

The goal of SMART construction outreach is to provide timely notification to businesses, property owners and tenants who live or work near the SMART right-of-way (ROW), who may be impacted by construction activities or crossing/road closures. We aim to ensure that nearby businesses and residents have as clear a picture as possible of all the activities that will take place on the right-of-way during construction.

Track and Crossing construction outreach each have some unique requirements, and we have established two sets of protocols to ensure that notification is effective for both track construction activities and crossing/road closures. Each protocol is focused on communicating directly with anyone likely to be impacted by construction activities.

During the Initial Operating Segment construction between 2012 and 2017, these protocols proved to be successful in keeping the community up to date and getting their questions answered. These protocols have also been used for the Larkspur Extension and Downtown Novato Infill projects (opened in December 2019) and the Windsor Extension (underway 2020 and 30% constructed prior to funding-related suspension being implemented). These protocols will also be used for SMART rail and pathway extension projects.

Track Construction Notification Protocol:

This process generally begins 4-8 weeks prior to construction.

Activity:

Create Google Earth maps showing business and residences in the areas identified for upcoming construction, with measurements showing 500 feet from track centerline. (Note: General practice for rail construction noticing is 300 feet, but SMART has elected to expand the baseline for noticing to 500 feet.)

1. Following a review of Google Earth maps, conduct a driving/walking tour of the areas beyond the 500-ft zone to determine what additional areas/parcels have sight lines and/or probability for noise reflection during construction. Adjust notification areas in the map(s) accordingly.
2. If determined that direct contact cannot be made, using Assessor's Property data, generate notification address list of those residents and owners of both residential and commercial property within 500 feet of the centerline of the specific section of the SMART ROW that will be under construction. Identify homeowner's associations and schools which are in the areas adjacent to the construction zone, as well as staff from local jurisdictions to be added to the

- notification list. Verify that any property owners in contact with SMART on real estate negotiations are also included.
3. Coordinate with Engineering & Construction to ensure that staff from local jurisdictions are aware of upcoming construction activity and receive invitations to attend any community meetings that have been scheduled.
 4. Identify and reserve a date, time, and a location convenient to the neighborhood, for one or more community meetings. The purpose of these meetings is to present an overview of all activities that will occur during construction and answer questions about construction topics. Meetings are generally scheduled in the evening so that those who work during the day can also attend. If construction areas are large enough to include multiple geographically unique neighborhoods, conduct multiple, conveniently located community meetings.
 5. Notify property owners, tenants, and businesses of upcoming community meetings via door hangers, flyers, paid media (and if necessary, US mail). All notifications include our Project Information telephone number for questions. These notices inform recipients that track construction will soon occur on the SMART ROW in their area and announce the meeting location, date and time. If US Mail is utilized, any mail that cannot be delivered by the postal carrier is returned to SMART Community Outreach, and SMART staff follows up on each item to determine if the owner of record has recently changed, or if the address is valid, and attempts to redeliver either via mail or visit to the address.
 6. Two weeks prior to the start of construction, conduct door-to-door canvassing to the addresses immediately adjacent to the right-of-way or construction zone to ensure that those who reside closest to the work being done receive an additional reminder. If residents are home, staff will speak to them directly as well as leaving a reminder door hanger/flyer; if no one is home, the door hanger/flyer is left in as secure a location as possible near the door without violating rules concerning mailbox use.
 7. Conduct community meeting to present construction details and to answer questions. The general format is a joint presentation by Community Outreach, the Contractor Construction Leads and SMART Engineering staff with pictures and description of what we are building, equipment that is used, construction days and hours, processes that are followed during construction for monitoring, and finished result. Content is tailored for each meeting to include neighborhood-specific information. Ample time is allowed to take and respond to questions from the public.
 8. In the case where notification or community meetings precede the actual start of construction by more than 3-4 weeks, additional door-to-door canvassing of areas adjacent to tracks is conducted with additional Track Construction Notification door hanger/flyers to ensure that residents and commercial buildings adjacent to the SMART ROW are informed of the start of construction.

9. Maintain up to date information on the SMART Construction Updates web page (ongoing throughout process).
10. Return calls to our Project Information line from the public (ongoing throughout process).

Grade Crossing/Road Closure Protocol:

This process generally begins 4-8 weeks prior to full or partial closure of a crossing for construction. Samples of the notifications referenced below are at the end of this section.)

There are cases where anticipated closure dates can change due to a variety of factors (including: weather, changes in construction schedule, working in partnership with local jurisdictions on accommodating their projects while SMART's crossing improvements are underway), so this process is designed to maintain flexibility while ensuring those in the notification area are kept up to date.

Activity:

1. Work closely with Construction Contractor to track crossing/road closures. A formal meeting is held once a week, supplemented by daily check-ins with lead contractor and participation in the bi-monthly "owners meeting." With 3-6-week look-ahead.
2. Generate Google Earth maps showing all businesses and residents in the area around a crossing identified for upcoming construction, with a measurement showing a 500-foot radius around the crossing. (Note: General Practices is to notify within 300 feet, but SMART has elected to expand the baseline for noticing to 500 feet.)
3. Following analysis of Google Earth maps, conduct a driving/walking tour of the areas around the crossing or road closure to determine additional residences and businesses that may be impacted by the crossing closure. Adjust notification zone accordingly.
4. Determine businesses, residences, schools, and others within the notification zone of the specific crossing that will be closed for construction. (This is done with Google Earth maps and site field/site visits.)
5. Coordinate with Engineering & Construction to ensure that staff from local jurisdictions are aware of upcoming crossing construction activity. Canvass crossing closure sites that have unique problems like lack of alternate routes to determine how best to minimize impacts.
6. Visit (re-canvass) each property within the notification zone to distribute crossing construction/closure information, speaking directly with business owners/managers, residents, property managers, school administration, etc. The construction information phone number is clearly located on all notification collateral materials and website.

7. Distribute crossing/road closure information to public safety agencies, US Post Office, Garbage Haulers, Caltrans, COZEEP, REDCOMM, etc.
8. Issue Crossing Closure Advisories to local press with up-to-date closure information.
9. Contractors place electronic message boards along adjacent roadways announcing road closure (1- 2 weeks prior to closure).
10. Maintain up to date information on the SMART Construction Updates web page (ongoing throughout process).
11. Return calls to our Project Information line from the public (ongoing throughout process).