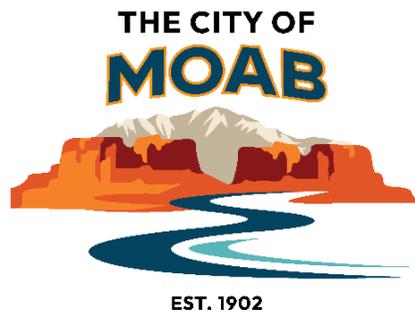




Moab Area Transit

MAT

Title VI Implementation Plan



Transit/Title VI Coordinator:
217 E Center St, Moab, UT 84532
transit@moabcity.org
435-259-4941

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EXECUTIVE SUMMARY

What is Moab Area Transit?

Moab Area Transit (MAT) is a 5-year pilot program. This transit service has two seasons, offering on-demand microtransit and fixed route options during the “peak” tourist season, and only on-demand microtransit in the “non-peak” season. MAT is majorly funded by the UDOT Recreational Hotspot program, City of Moab, and Grand County, with yearly applications for FTA 5311 grant funding. In compliance with Title VI, MAT grants all people equal access to its transportation services.

What is Title VI?

Title VI is a section of the Civil Rights Act of 1964 requiring that “No person in the United States shall on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” Note that Title VI does not address gender discrimination. It only covers race, color, and national origin. Other Civil Rights laws prohibit gender discrimination.

What is the Title VI Implementation Plan?

This plan is designed to serve as an educational tool for all to understand their rights to equal access to MAT transportation services under Title VI of the Civil Rights Act of 1964. This plan also describes the process to file complaints so that the service may correct discriminatory actions.

For more information on the transit service and Title VI, please contact:

Transit/Title VI Coordinator
City of Moab
217 E Center St., Moab, UT 84532
transit@moabcity.org
435-259-4941

TITLE VI NOTICE TO THE PUBLIC

Notice to the Public of Rights Under Title VI



Moab Area Transit (MAT) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. In addition to the protections provided in Title VI, and consistent with City of Moab employment policy, MAT is committed to expanded protections ensuring that no person is excluded from participation in, or denied the benefits of, its transit services or programs on the basis of race, color, national origin, religion, sex (including conditions of pregnancy), sexual orientation, gender identity, age, disability, veteran status, genetic information, or other groups protected by federal law, applicable state law, or local law.

Any person who believes she, he, or they have, individually, or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color, national origin, or other protected class may file a complaint with MAT.

This information is available in alternative formats and languages, free of charge, upon request. For more information on MAT's civil rights program, and the procedures to file a complaint, contact our Title VI Coordinator at 435-259-4941 or by e-mail at transit@moabcity.org; visit our website: www.moabcity.org/MAT; or visit our administrative offices at 217 E Center St., Moab, UT 84532. Office hours are Monday through Thursday 8:00am to 5:00pm, Friday 8:00am to 12:00pm.

A complainant may also file a complaint directly with the Federal Transit Administration by email at FTACivilRightsCommunications@dot.gov or by mail at the following address: Federal Transit Administration, Office of Civil Rights Attention: Complaint Team, East Building, 5th Floor-TCR 1200 New Jersey Ave. SE Washington, DC 20590

POSTED LOCATION OF THE TITLE VI NOTICE

MAT's Title VI notice to the public is posted at the following locations:

- MAT's website: www.moabcity.org/MAT
- Moab City Center, 217 E. Center St., Moab, Utah 84532
- MAT transit vehicles

PROCEDURES FOR FILING A TITLE VI COMPLAINT

Any person who believes they have, individually, or as a member of any specific class or persons, been subjected to discrimination on the basis of race, color, national origin, religion, sex (including conditions of pregnancy), sexual orientation, gender identity, age, disability, veteran status, genetic information, or other protected class may file a complaint with MAT.

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990, for alleged discrimination in any program or activity administered by MAT.

These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and MAT may be utilized for resolution. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited under Title VI and related statutes may file a complaint.

The following measures will be taken to resolve Title VI complaints:

1. A formal complaint must be filed within 180 days of the alleged occurrence. Complaints shall be in writing and signed by the individual or her/his/their representative, and will include the complainant's name, address and telephone number; name of alleged discriminating official, basis of complaint (race, color, national origin, sex, disability, age), and the date of alleged act(s). A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints.

The preferred method is to file your complaint in writing using the MAT Title VI Complaint Form (**Appendix A**), and sending it to:

MAT Title VI Coordinator
City of Moab
217 E Center Street
Moab, UT 84532
Phone: 435-259-4941
Email: transit@moabcity.org

2. In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to MAT Title VI Coordinator. Under these circumstances, the complainant will be interviewed, and MAT Title VI Coordinator will assist the Complainant in converting the verbal allegations to writing.
3. When a complaint is received, the Title VI Coordinator will provide written acknowledgment to the Complainant, within ten (10) days by registered mail.
4. If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided 60 business days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.
5. Within 15 business days from receipt of a complete complaint, MAT will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) days of this decision, the Executive Director or her/his/their authorized designee will notify the Complainant and Respondent, by registered mail, informing them of the disposition.
 - a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
 - b. If the complaint is to be investigated, the notification shall state the grounds of MAT's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
6. When MAT does not have sufficient jurisdiction, the Executive Director or her/his/their authorized designee will refer the complaint to the appropriate State or Federal agency holding such jurisdiction.
7. If the complaint has investigative merit, the Executive Director or her/his/their authorized designee will instruct the Title VI Coordinator to fully investigate the complaint. A complete investigation will be conducted, and an investigative report will be submitted to the Executive Director within 60 days from receipt of the

complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations and conciliatory measures where appropriate. If the investigation is delayed for any reason, the Title VI Coordinator will notify the appropriate authorities, and an extension will be requested.

8. The Executive Director or her/his/their authorized designee will issue letters of finding to the Complainant and Respondent within 90 days from receipt of the complaint.
9. If the Complainant is dissatisfied with MAT's resolution of the complaint, she/he has the right to file a complaint with the:

Federal Transit Administration
Region 10
Office of Civil Rights
915 Second Ave, Suite 3142
Seattle, WA 98174
Phone: 206-220-4462
Fax: 206-220-7959

FTA Complaint procedures can also be found on the FTA web site at: www.fta.dot.gov. These procedures are also outlined in FTA Circular 4702.1B, Chapter IX.

RECORD OF INVESTIGATION, COMPLAINTS, LAWSUITS

In compliance with 49 CFR Section 21.9(b), MAT shall prepare and maintain a list of any active investigations conducted by entities other than the FTA, lawsuits, or complaints naming MAT that allege discrimination on the basis of race, color, or nation origin. Such list shall include:

1. Date the investigation, lawsuit, or complaint was filed;
2. Summary of the allegation(s);
3. The status of the investigation, lawsuit, or complaint; and
4. Actions taken by the MAT in response to the investigation, lawsuit, or complaint.

Since service launch in 2023, there have not been any civil rights compliance review activities conducted with respect to MAT and, to the best of our knowledge, there are not presently any ongoing civil rights compliance review activities being conducted with respect to MAT.

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

MAT shall take steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). MAT will assist persons with limited English proficiency to participate in the transportation planning process. MAT Staff will make every effort to provide translators and document translation, where feasible, upon request. For the full LEP plan, visit www.moabcity.org/MAT or contact the Title VI Coordinator.

PUBLIC PARTICIPATION PLAN

MAT shall seek out and consider viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities in regards to proposed transportation decisions. MAT shall make every effort to include the following practices:

1. Coordination with individuals, institutions, or organizations and implementing community-based public involvement strategies to reach out to members in the affected minority and/or low- income communities;
2. Provision of opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments;
3. Utilization of locations, facilities and meeting times that are convenient and accessible to low- income and minority communities;
4. Utilization of different meeting sizes or formats, or varying the type and number of news media used to announce public participation opportunities; and
5. Implementation of DOT's policy guidance regarding MAT's responsibilities to LEP persons.

ANNUAL CERTIFICATION AND ASSURANCE

MAT shall submit annually their Title VI assurance, as part of their annual Certification and Assurance submission to UDOT.

TIMELY SUBMISSION OF TITLE VI UPDATES

MAT acknowledges that their Title VI submissions and/or updates thereto, shall be supplied to their FTA Regional Office once every three (3) years. The submission shall include, but is not limited to:

1. A summary of public outreach and involvement activities undertaken since the last submission and a description of steps taken to ensure that minority and low-income people had meaningful access to these activities;
2. MAT's process for persons with limited English proficiency (LEP);
3. Title VI Complaint and Tracking procedures;
4. A list of any Title VI investigations, complaints or lawsuits filed since the last submission; and
5. A copy of MAT's public notice regarding Title VI compliance and public access and instructions to MAT Title VI complaint procedures.

Portions of the Plan which have not changed since the last submission will not be resubmitted, however, MAT shall include a statement to this effect in lieu of copies of the original documents in order to eliminate redundancy in resubmissions.

MEMBERSHIP OF NON-ELECTED COMMITTEES AND COUNCILS

The City of Moab does not have any transit-related, non-elected planning boards, advisory councils or committees, or similar bodies.

ADDITIONAL INFORMATION

MAT acknowledges that, at the discretion of the FTA, information other than that which is required by FTA C 4702.1B, may be requested in writing of MAT, to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI.

SERVICE STANDARDS

As required by the Federal Transit Administration (FTA) as part of the Title VI program, MAT has service standards for vehicles, performance, and availability. These standards are important to ensure reliable service that is transparent to the general public, especially our riders.

The MAT pilot program began with microtransit and fixed route service options. These service options will be periodically reviewed and updated to balance economic feasibility and user demand.

Vehicle Load Standards

MAT currently utilizes the same vehicle model to operate the microtransit and fixed route services. At least one ADA-compliant vehicle is operational during service hours. Each vehicle will have a maximum seated capacity determined by the manufacturer and the number of seats and seat belts in the vehicle. The maximum vehicle load standard will be this maximum seated capacity. The wheelchair lift in the ADA-compliant vehicles reduces total capacity by one (1) seat.

MAT may not always load at maximums based on external factors such as weather or local, state, or federal health guidelines (e.g., reduced capacity due to COVID-19).

Vehicle Headway Standards

MAT operates a seasonal service in a natural recreation economy where demand grows and shrinks significantly based on the time of year. This requires vehicle service standards to vary significantly throughout the year. Operating and response times vary by “Peak” and “Non-Peak” seasons.

Microtransit response time involves the consideration of a number of factors including: demand, ridership productivity (riders/hour), transit friendly streets, housing density and population, seasonality, activities, regional planning, transit developments, land use connectivity and transportation demand management. MAT considers all these factors in determining its annual schedule and service planning.

Below is the initial service schedule for the microtransit zone:

Microtransit	Peak (Mid-March to Mid-October)	Non-Peak (Mid-October to Mid-March)
Operating Days	Mon – Sun	Mon – Fri
Operating Hours	8am – 9pm	9am-5pm
Avg. Response Time	15 min or less	15 min or less
Vans in Operation	2	2
Fixed Route	Peak (Mid-March to Mid-October)	Non-Peak (Mid-October to Mid-March)
Operating Days	Mon – Sun	N/A
Operating Hours	11am – 9pm	N/A
Lead Time	45 minutes	N/A
Vans in Operation	1	N/A

These standards for headway and operating hours are initial performance metrics based on the Operator’s pre-service analyses. The average response times for microtransit are based on average daily riders up to 100 for peak season, and 60 for non-peak season. The Operator will not be penalized for wait times that exceed these standards when daily ridership exceeds those counts. MAT will seek to improve upon these response times as resources allow, or provide more detailed standards, as part of establishing an effective transit network.

Headway standards for the fixed route are still being developed as more data is collected. Currently, estimated wait time for the stops, based on GPS location, are available via app or phone.

On-time Performance Standard

MAT will measure response time performance through its Operator’s management software, which will provide reporting on trip pickup and drop-off times, duration, and origin/destination. MAT currently defines an acceptable (on-time) response time as 15 minutes or less, and an unacceptable response time as more than 15 minutes, when average daily ridership is below 100 passengers for the peak season, or below 60 passengers in the off-peak season.

MAT on-time performance objective for microtransit is 90% or better. This objective will apply to the fixed route when a departure schedule is adopted.

Service Availability Standard

MAT's microtransit service area includes the entirety of Moab City limits and extends into unincorporated areas of Grand County. All passengers within the microtransit service area will be able to access the microtransit service upon request through the app or by calling the phone number. Microtransit vehicles will provide a door-to-door service, picking passengers up at their requested location and dropping them off at their desired destination within the service zone.

The fixed route has one route that operates on Main St./US-191. Due to the cramped and dangerous nature of Main Street, and inadequate infrastructure, the fixed route is not currently accessible by wheelchair. Wheelchair users are directed to use the microtransit shuttles, to be loaded in locations safer for the user and driver.

The microtransit service area exceeds the three-quarter (3/4) mile radius around the fixed route in compliance with paratransit standards, with consideration to the geologic limitations imposed by this cliff-enclosed valley.

Transit Amenities

For the microtransit service, MAT will work to identify park and ride areas for its passengers. Passenger amenities at these locations will be limited. As funding allows, MAT will work to develop the bus stops for the fixed route with possible amenities such as benches, lighting, and shelters.

Vehicle Assignments for Each Mode

Microtransit and fixed route vehicles will be equipped with air conditioning and padded seats. The fixed route will operate during the peak season, but not the off-peak season. Two ADA-compliant microtransit vehicles will operate during service hours. Vehicle age should not exceed 8 years.

RESPONSIBLE OFFICIAL'S APPROVAL

This Title VI Implementation Plan has been reviewed and approved by the following governing official responsible for policy decisions within Moab Area Transit, a City of Moab program.

Effective Date: 8/15/2024

DocuSigned by:
David Everitt
102B420522144FC...

David Everitt, City Manager

Attest:

DocuSigned by:
Sommar Johnson
77C1DA17F2BE482...

Sommar Johnson, City Recorder

APPENDIX A: TITLE VI [CIVIL RIGHTS] COMPLAINT FORM

MAT Civil Rights Complaint Form

Instructions: If you would like to submit a Title VI complaint to Moab Area Transit (MAT), please fill out the form below and send it to: MAT, Attn: Title VI Coordinator, 217 E Center Street, Moab, UT 84532. For questions or a full copy of MAT's Title VI policy and complaint procedures, call 435-259-4941 or email transit@moabcity.org.

Contact Information

Complainant's Name _____

Address _____

City _____ State _____ Zip _____

Telephone Number _____

Email Address _____

Person discriminated against (if someone other than the complainant)

Name

Address

City _____ State _____ Zip _____

Type of Civil Rights Complaint

- | | | |
|--|---|--|
| <input type="checkbox"/> Race | <input type="checkbox"/> Gender | <input type="checkbox"/> Gender Identity |
| <input type="checkbox"/> Color | <input type="checkbox"/> Religion | <input type="checkbox"/> Limited English Proficiency |
| <input type="checkbox"/> National Origin | <input type="checkbox"/> Age | <input type="checkbox"/> Income Status |
| <input type="checkbox"/> Disability | <input type="checkbox"/> Sexual Orientation | <input type="checkbox"/> Other |

Service Details

Date of Occurrence: _____ Destination: _____

Time of Occurrence: _____ Vehicle Number: _____

Microtransit or Fixed Route: _____ Driver's Name: _____

Boarding Location: _____ Driver's Badge Number: _____

Direction of Travel: _____

Incident Information

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons involved including the names and contact information of any witnesses and of those you believe discriminated against you. You may attach any written materials or other information relevant to your complaint.

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 each box that applies

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

Please provide a contact name at the agency/court where the complaint was filed:

Complainant's Signature: _____ Date: _____

APPENDIX B: TÍTULO VI DENUNCIA FORMA

MAT Título VI Denuncia Forma

Instrucciones: Si desea enviar una queja de Título VI a Moab Area Transit (MAT), complete el formulario a continuación y envíelo a: MAT, Attn: Title VI Coordinator, 217 E Center Street, Moab, UT 84532. Si tiene preguntas o para obtener una copia completa de la política del Título VI y los procedimientos de quejas de MAT, llame al 435-259-4941 o enviar un correo electrónico a transit@moabcity.org.

Su Información de Contacto

Su Nombre _____

Domicilio _____

Ciudad _____ Estado _____ Código Postal _____

Teléfono _____

Correo Electrónico _____

Persona Discriminada (si alguien más que usted)

Nombre _____

Domicilio _____

Ciudad _____ Estado _____ Código Postal _____

Tipo de Queja de Derechos Civiles

- | | | |
|--|---|---|
| <input type="checkbox"/> Raza | <input type="checkbox"/> Género | <input type="checkbox"/> Identidad de Género |
| <input type="checkbox"/> Color | <input type="checkbox"/> Religión | <input type="checkbox"/> Conocimiento Limitado del Inglés |
| <input type="checkbox"/> Origen Nacional | <input type="checkbox"/> Edad | <input type="checkbox"/> Estado de Ingresos |
| <input type="checkbox"/> Discapacidad | <input type="checkbox"/> Orientación Sexual | <input type="checkbox"/> Otra |

Detalles del Servicio

Fecha en que ocurrió: _____ Dirección del viaje: _____

Hora en que ocurrió: _____ Destino: _____

Número de la ruta: _____ Número del vehículo: _____

Lugar en que abordó: _____ Nombre del conductor: _____

Número de la credencial del conductor: _____

Información del Incidente

Explique, de la manera más clara posible, qué sucedió y por qué cree que fue discriminado. Describa a todas las personas involucradas, incluidos los nombres y la información de contacto de cualquier testigo y de aquellos que usted cree que lo discriminaron. Puede adjuntar cualquier material escrito u otra información relevante para su queja.

¿Han presentado esta queja con cualquier otro federal, Estado, o agencia local o con cualquier tribunal federal o estatal? Si No

En caso afirmativo, comprobar cada cuadro que se aplica

- Federal Agencia Federal Tribunal
 Estado Agencia Estado Tribunal Agencia Local

Proporcione un nombre de contacto en la Agencia donde se presentó la denuncia:

Por favor su firma: _____ Fecha: _____