



June 2024



Contents

Title VI Assurances	2
Title VI Complaint Procedures	2
Title VI Investigations, Complaints, and Lawsuits	4
Limited English Proficiency (LEP) Plan	4
Notification to Beneficiaries of Protection Under Title VI	4
Information Request	6
Subrecipient Assurances and Monitoring	6
Environmental Justice – Construction Projects	7
Equity Analysis to Determine Site or Location of Facilities	7
Inclusive Public Participation and Engagement	7
Systemwide Service Standards and Policies	12
Vehicle Load	13
Vehicle Assignment	15
Vehicle Headways	17
Distribution of Transit Amenities	18
Transit Access	18
Service Availability	19
Fares	19
On-Time Performance	19
Transit Security	20
Service and Fare Changes	21
Disparate Impact Policy	22
Transit Service Monitoring	27

Abbreviations

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



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

The following documentation is submitted by the Orange County Department of Planning (OCDP) to fulfill reporting requirements outlined in 49 C.F.R. Part 21, the information provided follows the requirements and guidelines for reporting as set forth in the program legislation.

Title VI Assurances

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

Title VI Complaint Procedures

General Overview

49 C.F.R. Part 21.1, provides that, "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance from the Department of Transportation."

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

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

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



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

Who do these Title VI procedures apply to?

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

Who may file a Title VI complaint?

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

What is discrimination under Title VI?

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

How and where is a discrimination complaint filed?

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

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

Commissioner
Orange County Department of Planning
124 Main Street
Goshen, New York 10924
Fax: (845) 291-2533
TransitOrange@OrangeCountygov.com



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

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

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

Title VI Investigations, Complaints, and Lawsuits

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

Limited English Proficiency (LEP) Plan

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

Notification to Beneficiaries of Protection Under Title VI

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

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



ORANGE COUNTY DEPARTMENT OF PLANNING TITLE VI POLICY STATEMENT

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

Additional Information:

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

Commissioner
Orange County Department of Planning
124 Main Street
Goshen, New York 10924

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

Complaint Procedures:

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



In addition to notifying citizens of their rights, OCDP has examined the language needs specific to its ridership within its LEP Plan and produces public materials to meet the identified language needs of its riders. OCDP is currently working with transit operators in distributing service schedules, maps, brochures, and other transit information in English and in other languages in targeted areas identified through the LEP Plan. All planning activities and notices which are advertised to the press are shared with news sources that serve a variety of Orange County's LEP communities.

Information Request

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

Subrecipient Assurances and Monitoring

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

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

- OCDP provides notices to the public informing beneficiaries of their rights under DOT's Title VI
 regulations, procedures on how to file a Title VI complaint, and its Title VI complaint form to its
 subrecipients.
- Subrecipients have adopted OCDP's procedures for tracking and investigating Title VI complaints filed with any of the subrecipients.
- OCDP has made available demographic information on the race and English proficiency of residents served by the subrecipients. This information will assist the subrecipient in assessing the level and quality of service it provides to communities within its service area and in assessing the need for language assistance.
- OCDP has also made available any other OCDP-generated or obtained data, such as travel patterns, surveys, etc., that will assist subrecipients in complying with Title VI regulations.
- OCDP ensures that its subrecipients are in compliance with Title VI requirements, by periodic verification of complaint log and operator data via operator oversight program.



Environmental Justice – Construction Projects

When completing construction projects, OCDP will complete all required analysis which includes but is not limited to the National Environmental Policy Act (NEPA) process. One such example is the County is in the early stages of designing and ultimately constructing the multimode Schunnemunk Trail which will connect pedestrians to both bus and rail transit. During the National Environmental Policy Act of 1969 (NEPA) process, FTA Region 2 found Orange County eligible for a Categorical Exclusion for the project. The Environmental Justice component of the NEPA process found that there were 6,060 persons living within ½ mile of the proposed trail, of which 28% are persons of color. The breakdown percentage of the population by race was found to be as follows; 79% White, 10% Black, 1% Asian, 7% Some Other Race and 2% Two or More races. In the area adjacent to the proposed trail 24% of the households earned less than \$50,000 annually per the EPA NEPA Assist EJSSCREEN 2019 ACS Summary Report that was utilized during the NEPA documentation. It was concluded that the project would provide safe non-motorized transportation options and no residents would be displaced during its completion.

Equity Analysis to Determine Site or Location of Facilities

Although Orange County does not own or operate any transit facilities, OCDP will follow criteria within 49 C.F.R. Part 21, to complete a Title VI equity analysis to evaluate any potential sites or locations of a facility to ensure the location is selected without regard to race, color, or national origin. Proper outreach methods will be followed to reach those who may potentially be impacted by the facility. If it is determined that the location of such facility will result in a disparate impact on the basis of race, color, or national origin, Orange County will verify there are no other alternatives before moving forward or substantially provide legitimate justification of the decision to implement the least discriminatory choice.

The County did not experience a major fare increase or service reduction since the last Title VI submission that would have required a formal equity analysis and submission to FTA.

Inclusive Public Participation and Engagement

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

<u>Organizational Structure</u>

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



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

OCDP, which performs planning and administrative activities, collaborates with transit operators via the operator oversight program. This program allows OCDP to coordinate with operators regarding complaints, language assistance, and day-to-day operations, and formally track these interactions. OCDP uses the information discussed within operator oversight meetings to inform the overarching planning process and guide the potential outreach initiatives.

Language Assistance and Translations Services

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

Operator Outreach Program

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

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

Meetings and Workshops

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

OCDP staff have presented at a number of community workshops to discuss transit alternatives in Orange County and their use. Over the last several years, these workshops have been targeted towards the Coordinated Public Transit Human Services Transportation plan update as well as the redesigns of both the Middletown and Newburgh Area Transit Services. In addition to gaining specific knowledge for each project this public outreach raised awareness and promoted transit usage. The County also actively coordinates with transit planners, human service agencies, transportation coordinators, transit operators, and county residents.



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

<u>Surveys</u>

In Fiscal Year (FY) 2021, Orange County administered an on-board transit survey to identify current, short-term, and long-term transit needs. As part of this effort, oversampling occurred within transit-dense communities in which minority low-income, and LEP populations have been identified. Surveying efforts were conducted with LEP language considerations. As a result of this survey, OCDP has implemented several initiatives to improve access to transit based on feedback received from riders. A subsequent on-board survey will be performed in FY 2024.

Coordination with Community Organizations

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

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

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

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



Coordination with OCTC

While OCDP utilizes the above public participation and engagement strategies, OCDP also coordinates with the OCTC, the region's MPO. OCTC's Public Participation Plan (PPP)is provided in Attachment E.

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

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



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

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

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



Table 2: 2021 – 2024 Orange County Transportation Council Public Participation Program

Planning Committee Meetings	Policy Committee Meetings	Transit Subcommittee Meetings	
1/25/2021	3/2/2021	12/12/2019	
4/13/2021	6/8/2021	1/14/2021	
5/11/2021	9/24/2021	5/5/2021	
6/8/2021	10/12/2021	11/3/2021	
7/13/2021	12/14/2021	3/16/2022	
9/15/2021 9/24/2021	3/1/2022		
11/9/2021	7/5/2022		
1/25/2022	9/7/2022		
4/12/2022	10/11/2022		
5/10/2022	12/13/2022		
6/14/2022	3/8/2023		
7/27/2022	5/23/2023		
8/9/2022	8/15/2023		
9/7/2022	9/20/2023		
11/29/2022	10/24/2023		
1/31/2023	12/12/2023		
4/25/2023	2/29/2024		
7/11/2023			
8/15/2023			
9/20/2023			
10/24/2023			

2/1/2024

Systemwide Service Standards and Policies

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



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

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

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

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

Vehicle Load

Vehicle load can be expressed as the ratio of passengers to the total number of seats on a vehicle. The County reviews and analyzes vehicle load factors on a quarterly basis after the transit operators submit their quarterly reports. Orange County's vehicle load service standards stipulate that the service providers (fixed route and commuter services) maintain a minimum load factor 0.15 and a maximum load factor 0.90. If quarterly reports indicate that the load factors are not within the designated range, Orange County planning staff will work with operators in examining current operations, identify trends, and develop alternative routing and/or service frequencies that bring service standards within compliance as needed.

On average, vehicle load profile data indicates load factors range from 0.12 to 0.37. Load factors on paratransit and Dial-A-Ride services should be considered on a different scale than fixed route transit on the basis of availability of service. Dial-A-Ride and paratransit vehicles consist of anywhere between 6 and 28 seats per vehicle and the load factor for any given run depends on the number of passengers making the reservation, and pick-ups along the route, which differentiates it from the load factors on fixed route transit and is a good indicator or level of service and capacity. Based on ridership data collected in 2022, no system-wide capacity constraints for the Dial-A-Ride and paratransit systems were



identified, with operators observing between 16 and 112 passengers per day on average. The following table reports on the findings for the vehicle load analysis for OCDP's operators*.

Table 3: Vehicle Load Profile

* Vehicle load profiles are based on 2022 ridership data.

	Annual Number		Annual	Average Annual	
Fixed Route	of Published	Vehicle	Number of	Number of	Load
Service	Runs	Capacity	Seats	Passengers	Factor
Middletown	10,400	28	291,200	36,187	12%
Newburgh	22,700	32	726,400	110,454	15%
Kiryas Joel	50,000	28	1,400,000	526,317	37%
Coach USA	61,690	54	3,331,260	895,215	27%

Vehicle Assignment

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

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

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

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



Table 4 – Vehicle Assignment Records

Kiryas Joel	Minority	Routes		
Vehicles	Status	Serviced	Age	Amenities
21	\checkmark	Local, Town, Woodbury	11	AC, W/C
22	\checkmark	Local, Town, Woodbury	11	AC, W/C
23	\checkmark	Local, Town, Woodbury	11	AC, W/C
24	\checkmark	Local, Town, Woodbury	11	AC, W/C
25	\checkmark	Local, Town, Woodbury	11	AC, W/C
26	\checkmark	Local, Town, Woodbury	11	AC, W/C
36	\checkmark	Local, Town, Woodbury	2	AC, W/C
37	✓	Local, Town, Woodbury	2	AC, W/C
Middletown	Minority	Routes		
Vehicles	Status	Serviced	Age	Amenities
901	✓	1, 2, 3, 4	11	AC, W/C
902	✓	1, 2, 3, 4	11	AC, W/C
903	√	1, 2, 3, 4	11	AC, W/C
5-5		-i -i 3i Ŧ		/ . / / .
Newburgh	Minority	Routes		
Vehicles	Status	Serviced	Age	Amenities
217	✓	Crosstown, Northside, Southside, Broadway	11	
219	\checkmark	Crosstown, Northside, Southside, Broadway	11	
221	\checkmark	Crosstown, Northside, Southside, Broadway	11	AC, W/C
223	\checkmark	Crosstown, Northside, Southside, Broadway	11	AC, W/C
225	✓	Crosstown, Northside, Southside, Broadway	11	AC, W/C
227	✓	Crosstown, Northside, Southside, Broadway	11	AC, W/C
229	✓	Crosstown, Northside, Southside, Broadway	2	AC, W/C
231	✓	Crosstown, Northside, Southside, Broadway	2	AC, W/C
231	·	Crosscown, Northside, Soothside, Broadway	2	<i>γ</i> (ς, ννης
Coach USA	Minority	Routes		
Vehicles	Status	Serviced	Age^{\dagger}	Amenities
-		Long Island Service	1	AC,Lav,W/C
-		Binghamton – NYC – Long Island	1	AC,Lav,W/C
-	\checkmark	Dutchess County - Newburgh	1	AC,Lav,W/C
-	\checkmark	Orange County to/from NYC	1	AC,Lav,W/C
_	✓	Main Line	2	AC,Lav,W/C
_	✓	Orange County	1	AC,Lav,W/C
_	√	Bear Mountain – West Point - NYC	1	AC,Lav,W/C
_	•	Eastside Manhattan Woodbury Common Service	1	AC,Lav,W/C
_	✓	Pennsylvania Points	1	AC,Lav,W/C
-	•	i Einisyivaina r Oinis	1	AC,Lav,vv/C

[†] Coach USA Hudson Transit has a fleet of 25 vehicles servicing Orange County. with an average age of 1.08 years old. A fleet manifest outlining the usage, model, age, and amenities of each vehicle is available.



-		GWB / Eastside Manhattan Commuter	1	AC,Lav,W/C
-	✓	OWL	1	AC,Lav,W/C

Vehicle Headways

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

Table 5: Vehicle Headway Service Standards

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

^{*}Commuter Bus services servicing people from Orange County to NYC and beyond.

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

Table 6: Vehicle Headways

	Minority		
Operator/Route	Status	Peak	Off-Peak
Middletown			
Route 1	✓	75 min.	75 min.
Route 2	✓	30 min.	75 min.
Route 3	✓	75 min.	75 min.
Route 4	✓	75 min.	75 min.
Newburgh			
Northside Route	✓	6o min.	6o min.
Southside Route	✓	6o min.	6o min.
Broadway Route	✓	30 min.	3o min.
Crosstown Route	✓	90 min.	90 min.
Kiryas Joel			
Local Route	\checkmark	6o min.	6o min.



^{**} Local Bus services servicing people traveling within Orange County.

Woodbury Common Route	\checkmark	6o min.	60 min.
Walmart Route	✓	6o min	60 min

Distribution of Transit Amenities

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

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

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

Transit Access

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

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

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



Paratransit services are provided in accordance with the Americans with Disability Act (ADA) in all areas with local bus services, provided the origin and destination of the trip are within ¾ of a mile from an existing fixed bus route.

Service Availability

Orange County defines service availability as a measure of the distribution of routes within a given transit provider's service area. At the county level, all the transit service areas (fixed route, Dial-A-Ride, and complementary paratransit services) cover 89.79 percent of the total population of the County. To ensure the highest potential transit ridership and the greatest availability of services to Orange County residents, fixed transit routes and amenities are concentrated in high and medium density areas. Areas of low density are serviced by municipal Dial-A-Ride services where such services exist. As summarized in Table 8, bus transit services in the county cover 93.5 percent of high-density census tracts, 92.9 percent of medium density census tracts, and 81.2 percent of all low-density census tracts.

Table 7: Service Availability by Population Density

Density	Service Availability
High Density (> 1000 persons per square mile)	93.5%
Medium density (> 500 and <= 1000 persons per square mile)	92.9%
Low Density (< 500 persons per square mile)	81.2%

Fares

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

On-Time Performance

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



C -! - -

Transit Security

OCDP maintains a complete roster of vehicles serving Orange County. Information on this roster includes vehicle dimensions, passenger load, condition, mileage, as well as a unique "Operator Identification Number" for each vehicle. This number is also painted on the side and rear of the vehicle and can be used to track and identify vehicles when in service. The transit vehicle rosters, both fixed route and Dial-A-Ride, can be found in Attachment G1 and G2.

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

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



• Coach USA (Commuter Service): Buses are parked at a garage which is manned and operational 24 hours a day. The buses have GPS technologies on-board and require a unique start up code specific to each driver to be inputted to allow ignition.

Service and Fare Changes

Pursuant to FTA regulations, the OCDP has established the following written procedures for public outreach when fare increases and/or major service reductions take place in a service area in which the transit provider operates 50 or more fixed route transit vehicles at peak service and is located in an UZA with 200,000 or more in population, as above (Systemwide Service Standards and Policies), are proposed by transit operators receiving federal assistance.

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

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



- 4. The transit provider is responsible for making a presentation at the public meeting explaining the proposal and the reasoning behind the intended changes. Minutes of the meeting will be maintained and recorded, and statements from the public will be entered into a formal record and summarized.
- 5. All public meeting/comment materials and a memorandum outlining the proposed fare increases and/or major service reductions shall be submitted to the Orange County Planning Commissioner no more than 30 days after the public hearing is held.
- 6. Transit providers are required to notifythe New York State Department of Transportation (NYSDOT), Public Transportation Bureau (PTB), 50 Wolf Road, POD 5-4, Albany, NY 12232 of major fare/tariff changes as per NYSDOT regulations 17 NYCRR Part 730 at least 30 days prior to the effective date.
- 7. Transit providers are responsible for submitting a public announcement of the intended fare increases and/or major service reductions to local newspapers in the form of a press release. Public notification must be distributed and posted through the same outlets as the legal notice (Item Number 3). Fare increases and/or major service reductions shall not go into effect until at least 30 days have lapsed following the publication of the public announcement.

Disparate Impact Policy

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

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

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

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



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

Transit Service Monitoring

OCDP's monitoring program examines how well Transit Orange services meet the needs of Orange County residents, specifically those of minorities, people of lower incomes and LEP persons, to ensure that equitable transit services are provided to all segments of the service area's population. In the summer of 2021, Orange County conducted a countywide on-board ridership survey to better understand travel behavior; examine patterns of service usage, fare media preference, and rider disposition towards transit; collect rider satisfaction data to inform short- and long-term service enhancements; and collect data to support long-range planning efforts. The survey was performed on board all bus routes funded by the Department, including demand responsive and Paratransit services, during different parts of the service schedule day (morning period, evening period, late night, for example) to collect a sample of data that represents various sub-populations of transit ridership. A subsequent on-board survey will be performed in FY 2024. As part of this update, more expansive survey options will be considered to help understand the overarching mobility needs, including those not currently served by traditional transit services.

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

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



Table 8: Operator Oversight Program
LEP and Transit Service Performance Standards

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

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

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





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Attachment A: Complaint Form



Orange County Title VI Complaint Form

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

Complainant's Information:
Name:
Address:
City/State/Zip Code:
Telephone Number (Home):
Telephone Number (Work):
Person Discriminated Against (if someone other than complainant)
Name:
Address:
City/State/Zip Code:
Telephone Number (Home):
Telephone Number (Work):
Which of the following best describes the reason you believe the discrimination took place?
Race/Color (Specify):
National Origin (Specify):
Other:

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

Describe the alleged discr you believe was responsible of paper).	-	
List names and contact in knowledge of the alleged of		o may have
Have you filed this compla agency, or with any federa	_	•
Federal Agency	Federal Court	State Agency
State Court	Local Agency	
If you have checked above person at the agency/cour	-	
Name:		
Address:		
City/State/Zip Code:		
Telephone Number (Home):		
Telephone Number (Work):		
Please sign below. You mainformation that you think		
Complainant Signature:		Date:
Attachments: Yes No		
Submit form and any addit	tional information to:	
Commissioner Orange County Departmer 124 Main Street	nt of Planning	

Orange County Department of Planning 124 Main Street Goshen, New York 10924 Fax: (845) 291-2533 TransitOrange@orangecountygov.com

Attachment B1: Sample Complaint Tracking Form

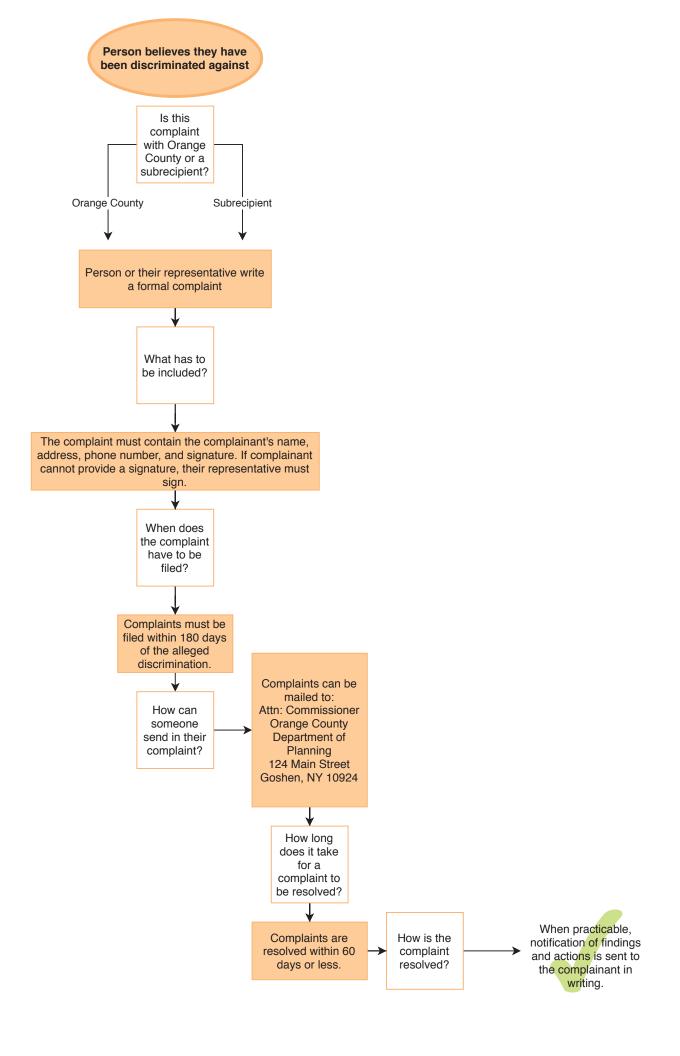


ORANGE COUNTY DEPARTMENT OF PLANNING Title VI Investigations, Complaints & Lawsuits Log										
Complaints										
Investigations										
Lawsuits										

Attachment B2:

Complaint Intake, Monitoring, and Resolution process





Attachment C: LEP Plan





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



June 2024



Orange County Limited English Proficiency Plan

Contents:

Factor 1: The Number and Proportion of LEP Persons Served or Encountered in the Elig Population	
Geographic Distribution of Total Population with Limited English Proficiency	3
Distribution of Population with Limited English Proficiency by Language or Language	Group 6
LEP Population Concentrations and Transit Service	7
Factor 2: The Frequency with Which LEP Individuals Come into Contact With You Activities, and Services	
Factor 3: The Importance to LEP Persons of Your Program, Activities and Services	13
Factor 4: The Resources Available to Recipients and Their Costs	16
Vital Documents:	16
LEP-Related Services	16
Providing Language Assistance for Relevant Programs, Activities, and Services	17
Training Orange County Staff	17
Providing Notice to LEP Persons	18
Monitoring and Updating the LEP Plan	19



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

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

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

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



Factor 1:

The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population

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

Geographic Distribution of Total Population with Limited English Proficiency

According to the 2018-2022 American Community Survey, in 2022 Orange County had a total population of 401,237, of which 374,237 were individuals age 5 years and older. Of this population, 73.0 percent speak only English, while the remaining 27.0 percent speak other languages, either in addition to or instead of English, which includes 13.7 percent of individuals age 5 years or older who speak Spanish or Spanish Creole, 11.1 percent who speak Indo-European languages, 1.5 percent who speak Asian and Pacific Island languages, and the remaining 0.7 percent who speak other languages as shown in Figure 1. LEP population is characterized as people who speak a language other than English at home and speak English less than "very well". Approximately 11.3 percent of Orange County's total population speak English less than "very well," which is lower than the 13.5 percent of New York State's total population who speak English less than "very well."

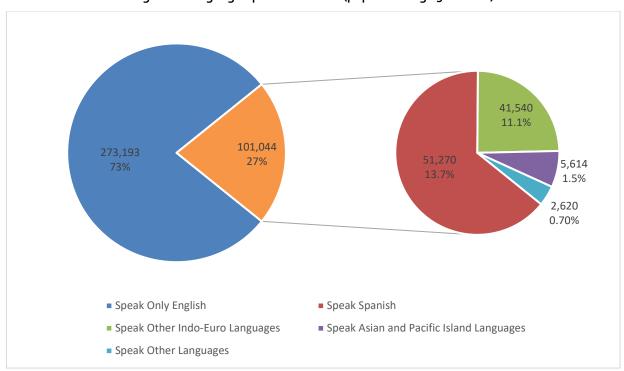


Figure 1: Language Spoken at Home (population age 5 or older)



Orange County Limited English Proficiency Plan

Orange County contains 292 census block groups as of the 2022 American Community Survey, of which 75 contain LEP populations above the County average. These 75 block groups contained 32,574 LEP residents according to the American Community Survey's 5-year estimates, or 76.8 percent of the County's LEP residents. The 75 census block groups containing a higher percentage of LEP individuals than the County average are located in three major areas. The largest cluster of LEP tracts is in the Newburgh, Middletown, and New Windsor area. The highest cluster by number (17) of census block groups is in the Monroe-Kiryas Joel-Harriman area of the County, it has the highest concentration of LEP population with an average LEP population over 60 percent of the total population across the cluster. The other remaining cluster is made up of 13 census block groups in the Newburgh area. Figure 2 illustrates the countywide distribution of LEP populations.

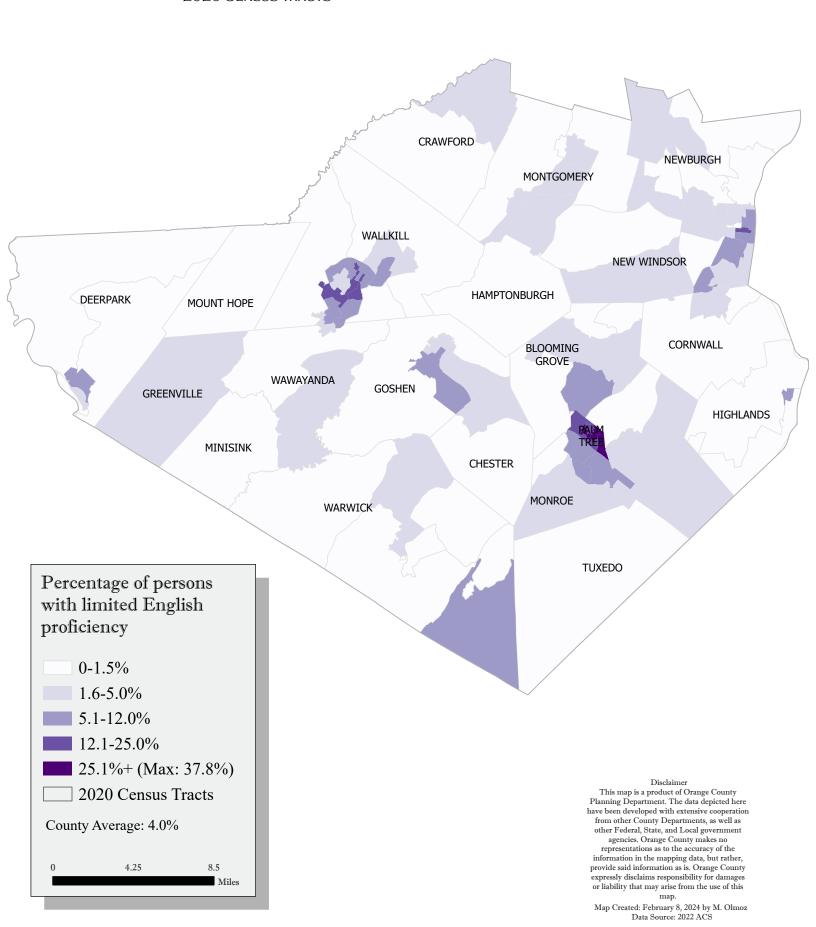


Figure 2: LEP Basemap



LIMITED ENGLISH PROFICIENCY

2020 CENSUS TRACTS



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

Much like New York State overall, the largest share of the LEP population in Orange County speak Spanish as their primary language. Statewide, 48.6 percent of LEP populations age 5 and older are Spanish speaking, which is more than the Orange County share of 39.5 percent of the LEP population. Overall, the Spanish-speaking population – LEP and non-LEP individuals included - represents 13.7 percent of the County's total population age 5 and older.

Spanish

With the exception of census block groups located in Kiryas Joel and the surrounding areas of Monroe, as well as some census block groups North of Chester, North of Middletown, Greenwood Lake and near Port Jervis, all of the high-LEP census block groups contain a higher percentage of Spanish-speaking LEP persons than the County average. The greatest concentrations of Spanish-speaking LEP persons in the County (over 10 percent of the total population age 5 and older), are concentrated in and around Middletown, New Windsor, and Newburgh, with smaller pockets in Greenwood Lake, Goshen, and Monroe. The census tracts which contain the highest concentration of Spanish-speaking LEP persons are served by Middletown Area Transit, Newburgh Area Transit, and the Main Line local transit service. LEP populations in these block groups account for over 15 percent of the LEP population overall. Spanish-speakers compose over 90 percent of the LEP population in the areas of Middletown and Newburgh.

Indo-European Languages

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

Asian and Pacific Languages

LEP persons who speak Asian and Pacific languages make up 100 percent of the LEP population in 7 census block groups, however the total number of individuals in these groups is only 226. There are three census block groups with a concentration of Asian and Pacific language speaking LEP individuals of more than 100 people, there are 8 block groups with over 50 LEP individuals in this language group. These are located near Highland Falls, Monroe, Middletown, Newburgh, Port Jervis and Wallkill.

Other Languages

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



LEP Population Concentrations and Transit Service

The concentrations of LEP populations are predominantly located in three clusters—Middletown, Newburgh, and the Kiryas Joel-Monroe-Harriman region. Respectively, these areas have 15, 20, and 24 census block groups that have LEP populations greater than the County average of 11.3 percent. These areas are served by local bus routes like the Main Line, Middletown Area Transit, Newburgh Area Transit, and the Kiryas Joel Area Transit service. They are also served by Coach USA/Shortline. Maps showing overlay of commuter and local fixed route transit services, Dial-A-Ride service areas, and paratransit service area maps relative to the LEP population are shown in Figures 3, 4 and 5.



Figure 3: LEP Population with Commuter and Local Fixed Routes

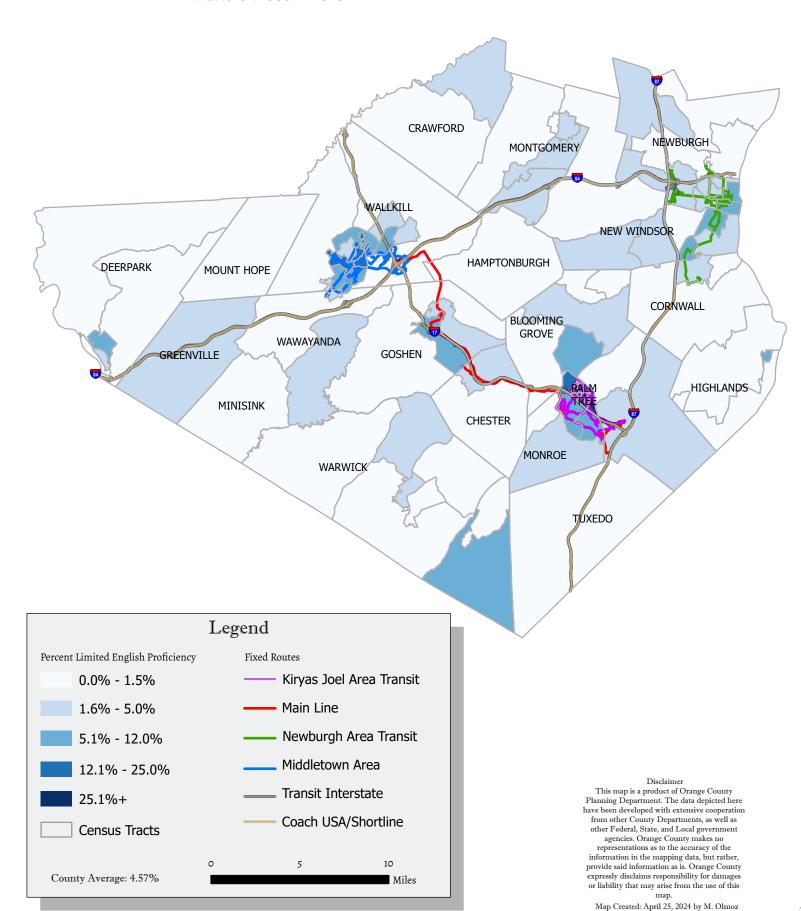




PERCENT LIMITED ENGLISH PROFICIENCY

& OC TRANSIT ROUTES

2020 CENSUS TRACTS



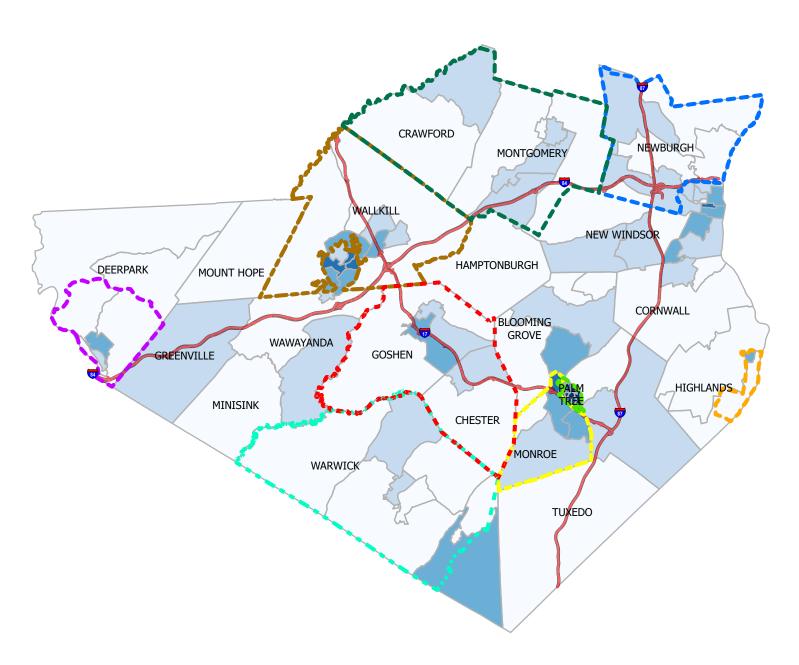
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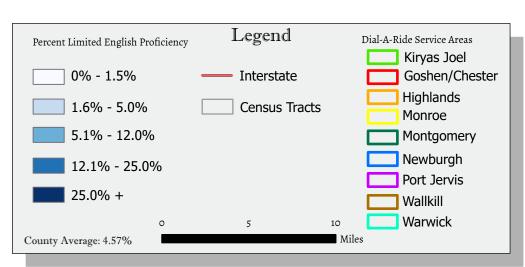
Figure 4: Population with Dial-A-Ride Service Areas





PERCENT LIMITED ENGLISH PROFICIENCY & DIAL-A-RIDE SERVICE AREAS 2020 CENSUS TRACTS





Disclaimer This map is a product of Orange County Planning Department. The data depicted here have been developed with extensive cooperation from other County Departments, as well as other Federal, State, and Local government agencies. Orange County makes no representations as to the accuracy of the information in the mapping data, but rather, provide said information as is. Orange County expressly disclaims responsibility for damages or liability that may arise from the use of this map.

Map Created: April 18, 2024 by M. Olmoz Data Source: 2022 ACS

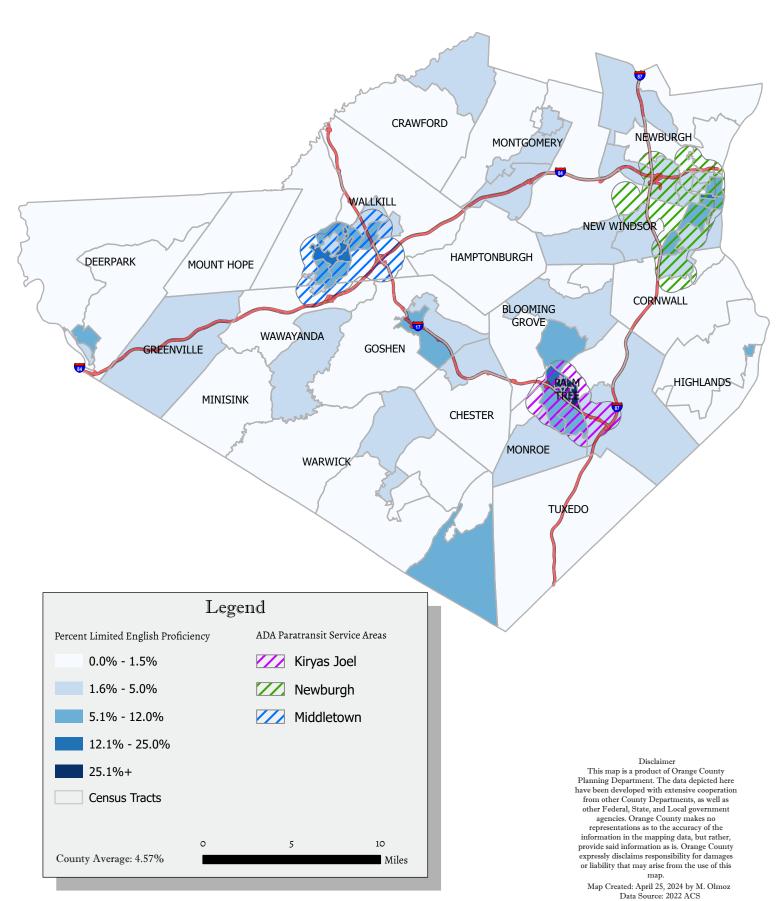
Figure 5: LEP Population with Paratransit Service Areas





ORANGE COUNTY, NY

PERCENT LIMITED ENGLISH PROFICIENCY & ADA PARATRANSIT SERVICE AREAS 2020 CENSUS TRACTS



Factor 2: The Frequency with Which LEP Individuals Come into Contact with the Programs, Activities, and Services

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

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

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

- Orange County Transportation Council (OCTC) Meetings: OCTC is the Metropolitan Planning Organization (MPO) for Orange County. OCTC's meetings are open to the public and cover all aspects of transportation planning processes including public transportation services. A complete list of meetings that occurred over the last three years for OCTC is available within the Title VI Plan. LEP contact made during OCTC meetings is recorded in the LEP Service Log along with service requests over the phone or those made in person at the County office.
- Operator Outreach: As part of a continued operator outreach, the County maintains
 consistent communication with local partners, and thereby in turn with the transit riders by way
 of engaging community organizations and the business community to understand the needs of
 the LEP population. For example, transit operators regularly communicate with leaders of
 community organizations and managers of businesses frequented by LEP populations to
 understand how they may be able to improve accessibility to services and/or improve services to
 meet community needs more effectively. Information collected from these outreach efforts are



Orange County Limited English Proficiency Plan

discussed with Orange County planning staff during the operator oversight meetings. There have been no requests for language assistance received by any of the operators. In cases where English is not the primary language of the customer, scheduling requests have been made by a relative or household member that speaks English.

• **Frequency Monitoring**: Analysis of frequency monitoring through the above-mentioned outreach and customer contact mechanisms indicates that language assistance is seldom sought for Orange County's transit services. The County stipulates operators submit logs of their LEP contact and all requests for translation and language assistance. A majority of transit operators reported that they receive no requests for language assistance. For the few that received requests, the frequency is less than one request per month, with some operators receiving less than five requests per year. Orange County has not directly received any requests for language assistance through any of its outreach and customer contact outlets. When requests for language assistance occur individuals typically are able to speak English as a second language and are requesting information on dial-a-ride and paratransit service eligibility.



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

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

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

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

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

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

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



Travel Training: During transit workshops or upon request Orange County staff will facilitate
travel training programs to any traveler (including LEP persons or populations) in order to
educate them on available services, travel safety, transfers, system navigation, and general
independent travel within the system.

Rider Survey: Orange County conducted a countywide on-board ridership survey in the spring and summer of 2021 to better understand travel behavior; examine patterns of service usage, fare media preference, and rider disposition towards transit; collect rider satisfaction data to inform short- and long-term service enhancements; and collect data to support long-range planning efforts. The efforts were completed using survey forms provided in multiple languages (English, Spanish, and Yiddish), targeting specific communities in the LEP population. A subsequent on-board survey will be performed in Fiscal Year (FY) 2024. Additionally, OCDP, at times in partnership with OCTC, oversees several programs, tasks, and initiatives that provide benefit to the county's LEP population. This includes the following:

• Coordinated Transportation Plan: The Coordinated Public Transit Human Services Transportation Plan (Coordinated Plan) was first prepared in 2008 and adopted in October 2008. Developed in accordance with federal transportation law enacted via the Moving Ahead for Progress in the 21st Century Act (MAP-21), the plan sets the baseline for assistance of the elderly, disabled individuals, and other groups in need of further assistance. An interim update was prepared in order to specifically address MAP-21 and the plan update was approved in June 2015. A more comprehensive update of the Coordinated Plan was prepared in September 2018 to address further legal provisions provided in the Fixing America's Surface Transportation (FAST) Act. The plan was updated in 2023 to meet the requirements of the Infrastructure Investment and Jobs Act (IIJA).

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

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

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



Orange County Limited English Proficiency Plan

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

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



Factor 4: The Resources Available to Recipients and Their Costs

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

Vital Documents:

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

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

LEP-Related Services

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

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



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

Providing Language Assistance for Relevant Programs, Activities, and Services

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

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

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

OCDP has received two language assistance requests since the last Limited English Proficiency Plan submission.

Training Orange County Staff

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



Orange County Limited English Proficiency Plan

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

Providing Notice to LEP Persons

OCDP and its subrecipients post the County's Title VI Policy Statement through various media outlets, centered around the Department's transit website – www.ridetransitorange.com, which has the ability to be translated, for example through free online services like Google Translate.

In addition, all Orange County transit vehicles are equipped with English and Spanish signage informing passengers of Orange County and its sub-recipients' commitment to providing nondiscriminatory service and passengers' rights under Title VI. Moreover, bi-lingual signage (Figure 5) informing passengers of how to contact Orange County with any comments or complaints are posted on-board vehicles and in public facilities. The County's formal complaint procedures are in place to allow individuals to submit grievances, have the complaint investigated by the Orange County Planning staff, and provide resolution to the grievance. All grievances are tracked within the Title VI Complaint Log and all information and documentation associated with each complaint is cataloged in the log as well.

Orange County is committed to providing El Condado de Orange se compromete a proveer un nondiscriminatory service to ensure that no servicio no discriminatorio para garantizar que person is excluded from participation in, denied ninguna persona sea excluida de participar en, sea the benefits of, or subjected to discrimination in negada los beneficios de, o sea discriminada al the receipt of its services on the basis of race, recibir servicios basado en su raza, color u origen color, or national origin as protected by Title VI of nacional como está protegida por el Título VI de la the Civil Rights Act of 1964 ("Title VI"). Ley de Derechos Civiles de 1964 ("Título VI"). equest more information about Title VI or to submit ritten complaint if you believe that you have been jected to discrimination, you may contact: Orange County Department of Planning
//o Transit Planner Orange County Department of Planning /o Transit Planner 887 County Building

Figure 4: On-Board Title VI Notification Signage - English & Spanish

All planning activities and notices which are advertised to the press are shared with media sources that serve a variety of Orange County's LEP communities.



Monitoring and Updating the LEP Plan

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

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

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

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

A subsequent on-board survey will be performed in FY 2024 that will more broadly cover the County's fixed-route and demand responsive services. As part of this update, more expansive survey options will be considered to help understand the overarching mobility needs, including those not currently served by traditional transit services.

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

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



Orange County Limited English Proficiency Plan

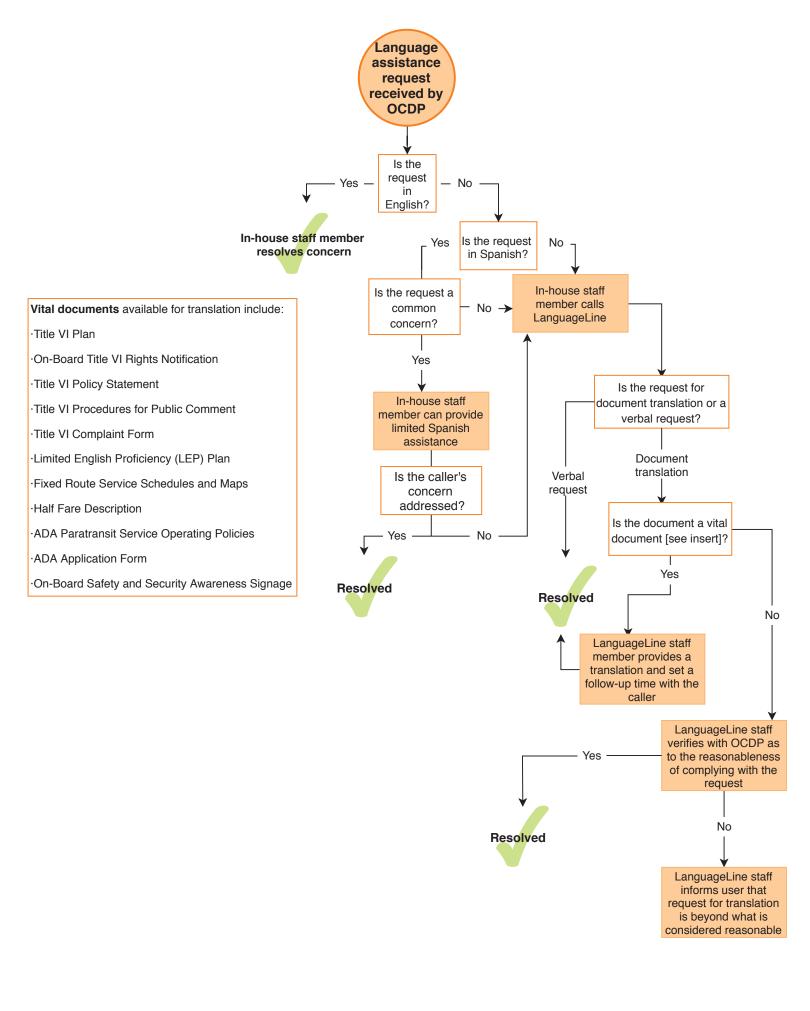
- b. Review the findings and resolution of the complaint; and
- c. Follow up on any previous complaints to ensure agreed upon resolutions are being or have been performed.
- 2. Review pro-active outreach activities for each transit operator.
- 3. Work with operators to review findings from current Title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



Attachment D:

Orange County Language Assistance Process





Attachment E: Public Involvement Procedures



Orange County Transportation Council









October 12, 2021

Public Participation Plan

DISCLAIMER

The preparation of this report has been financed in part through grant[s] from the Federal Highway Administration and Federal Transit Administration, U.S. Department of Transportation, under the State Planning and Research Program, Section 505 [or Metropolitan Planning Program, Section 104(f)] of Title 23, U.S. Code. The contents of this report do not necessarily reflect the official views or policy of the U.S. Department of Transportation.

TITLE VI STATEMENT

The Orange County Transportation Council (OCTC) assures that no person shall on the grounds of race, color, sex, age, disability or national origin, as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100.259) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity. OCTC further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not.

OCTC CONTACT INFORMATION

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Executive Summary

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

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

Part 2: Public Participation Process provides a complete overview of OCTC's approach to public involvement as it relates to the MPO's products and activities outlined in Part 1. This includes the purpose statement and goals, which are the guiding principles of the PPP, as well as identifies Stakeholders; Diversity & Inclusiveness highlights the importance of Orange

County's growing and diverse communities and offers Strategies for Inclusiveness to identify barriers of outreach and to engage with hard-to-reach communities; and Strategies for Outreach outlines the Spectrum of Public Participation and Outreach Toolbox for public involvement, including descriptive strategies that can be utilized in engagement; Lastly, the OCTC establishes ways to evaluate the success of strategies and engagement efforts, as well as evaluate the overall effectiveness of the Public Participation Plan in Monitoring & Evaluation and establishes a process for updating the plan in Update Procedure. In addition to the two (2) main parts of this Plan, there are also two (2) appendices, including Appendix A: State and Federal Regulations which provides more information on requirements that impact public participation, including non-discrimination legislation; and Appendix B: Maps of Community Demographics features maps and socio-economic and demographic information of Orange County to help identify populations when creating an outreach strategy.

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

Please visit the OCTC's website at www.
OrangeCountyGov.com/OCTC for more information on the MPO and its work products. To be added to the OCTC Contact list, contact MPO staff via email at octc@orangecountygov.com.

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Table of Contents

Executive Summary	
Introduction	1
Part 1: Understanding the MPO	3
OCTC Overview	5
Regulations	6
Agency Coordination	7
MPO Core Functions and Work Products	7
Participation Procedures	10
Other MPO Functions	10
Nondiscrimination Policy Statement & Complaint Procedure	11
Part 2: Public Participation Process	13
Purpose Statement	
Goals	16
Stakeholders	17
Diversity & Inclusiveness	18
Strategies for Outreach	20
Outreach Toolbox	21
List of Strategies	23
Monitoring & Evaluation	28
Update Procedure	28
Appendix A: Federal and State Regulations	30
Appendix B: Maps of Community Demographics	36

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Introduction

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

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

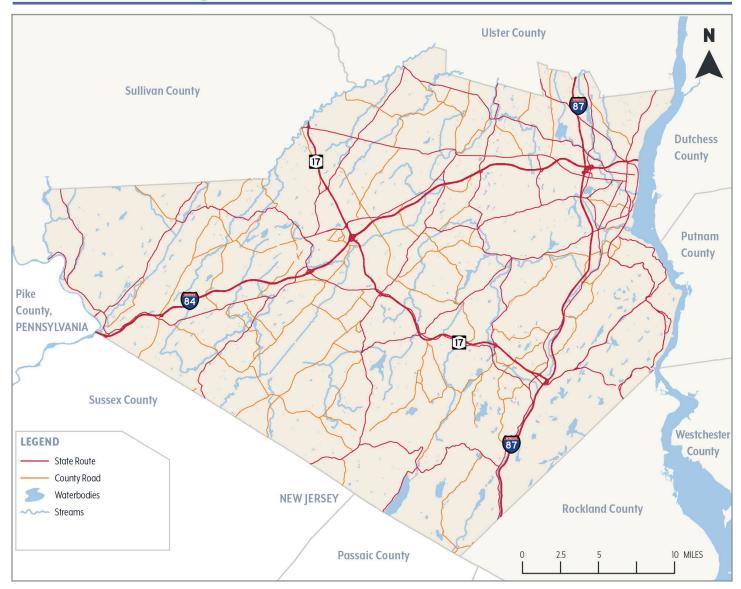
With improvements in technology, new communication trends, an increasing and diverse populace, and ongoing federal requirements, MPOs must explore new ways to engage stakeholders,

present programs in understandable formats, and most importantly, hear concerns, opinions, and ideas of Orange County residents. The OCTC recognizes that barriers to effective public involvement exist and strives to create an inclusive process for participation. As the MPO explores new technologies and trends, it must balance overall effectiveness, inclusion, and fairness of the outreach process.

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



Map of Orange County



Orange County offers its residents and businesses connectivity and access to urban amenities and markets, with enough physical separation and open space to maintain a high quality of life at relatively low costs. The county's geography and topography have fostered a mix of small cities surrounded by suburban development, charming and historic villages and hamlets with distinct identities, meandering rivers that have deposited rich soils ideal for agriculture, and rugged, forested hills that break up the landscape and are part of an extensive system of parks and preserves.

Orange County's transportation system serves people who live in a variety of communities nestled into the hills of the Lower Hudson Valley. Residents and visitors, along with the county's economy, depend on a well-functioning transportation system that is reliable, accessible, and resilient.

Part 1

Understanding the MPO

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OCTC <u>Overvi</u>ew

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

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

The Orange County Department of Planning (OC Planning) is staff to the OCTC (OCTC Staff) and is responsible for coordinating OCTC activities and administering the Unified Planning Work Program (UPWP). The OCTC, being a consortium that cannot enter contracts or employ staff, has designated the County of Orange as its host agency through a contract with State of New York.

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

Policy Board and Planning Committee meetings are open to the public. Members of the public are invited to offer comments during the designated public participation section of the agenda on any item relevant to the agenda or the transportation planning process. The public also has the opportunity to provide comments on any agenda item as it is being discussed, with the approval of the chairperson, and as time permits. Comment times may be limited.

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

Table 1: OCTC Roles and Responsibilities

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

Regulations

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

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

Basic public participation requirements have been established by law, as in the Administrative Procedures Act and the National Environmental Policy Act (NEPA), and by regulations and guidance issued by federal agencies including, but not limited to the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), and the Environmental Protection Agency (EPA). These regulations establish the minimum requirements for making information available, providing notice to, and consulting the public, holding public hearings and meetings, establishing advisory groups, and inviting comment from the public.

Fixing America's Surface Transportation (FAST) Act

The current transportation bill is the Fixing America's Surface Transportation (FAST) Act. It was passed by Congress and signed by President Obama on December 4, 2015. The FAST Act authorizes \$305 billion nationwide over fiscal years 2016 through

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

Agency Coordination

Coordination on public involvement and consultation processes with federal, state, & local agencies is an important part of the transportation planning process in order to reach a larger audience, minimize costs, limit redundancies, and give due consideration to other related planning activities in Orange County. This includes both federally mandated planning products and planning studies and activities of statewide significance. The OCTC will actively seek to integrate the public planning process with public involvement activities undertaken as part of the statewide transportation planning process. The OCTC will pursue improvements to integration with statewide activities through its participation in the New York State Association of Metropolitan Planning Organizations (NYSAMPO) and regional activities through participation in the Metropolitan Area Planning (MAP) Forum and the Mid-Hudson Valley Transportation Management Area (TMA).

Environmental Agency Coordination

The OCTC consults with federal, state and local agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation in developing transportation plans such as the TIP and LRTP.

Other consultation activities involve, as appropriate, identifying the appropriate responsible agencies and developing partnerships, encouraging participation in the development of major planning products, and facilitating discussions on potential environmental mitigation activities. The OCTC Staff works closely with the OC Planning environmental and land use divisions to coordinate with federal, state and local agencies to maintain relevant inventories and resource maps for Orange County.

MPO Core Functions and Work Products

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

Long Range Transportation Plan (LRTP)

The LRTP provides a framework for planning, policy, and investment decision making within the Orange County planning area. It addresses at least a 20-year planning horizon and includes both long- and short-range strategies and actions that lead to the efficient movement of people and goods by maintaining and developing an integrated transportation system. Federal law requires that any MPO in an air quality non-attainment or maintenance area review and update their LRTP every four years. See *Air Quality Conformity* for more information. The LRTP is available online at the OCTC website, or by request.

Transportation Improvement Program (TIP)

The TIP is a federally mandated five-year multimodal transportation projects list that lists agreed upon priority capital and maintenance projects to be funded/built using a combination of federal, state, local, and private transportation dollars. Projects on the TIP must be consistent with the goals and objectives found in the LRTP, and the TIP is generally updated with the Statewide TIP (STIP), which occurs every two to three years, but no less than four. The New York State Department of Transportation (NYSDOT) is responsible for the STIP, and OCTC works cooperatively with NYSDOT Region 8 on this process.

Procedures for TIP Administrative Modifications and Amendments can be found in the <u>OCTC Operating Procedures</u>. The <u>TIP is available online</u> at the OCTC Website or by request.

Unified Planning Work Program (UPWP)

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

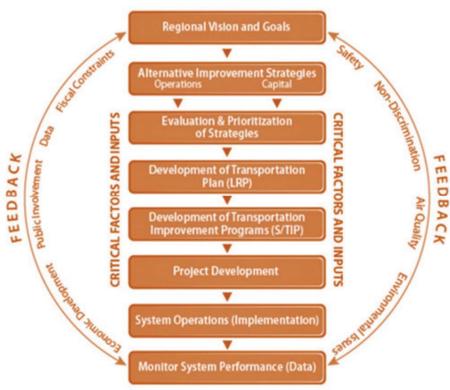
Air Quality Conformity (AQC)

Air Quality Conformity or Transportation Conformity is a required process by which the MPO ensures that transportation projects or investments will not significantly impact a region's ability to meet or maintain federal air quality standards. As part of the Air Quality Conformity process, OCTC prepares a Conformity Determination to demonstrate that the LRTP and TIP

demonstrate that the LRTP and TIP are in compliance with the mobile source emissions budgets for the air quality nonattainment and maintenance areas. The OCTC works with the New York State Interagency Consultation Group (ICG) to assess project classifications and identify whether certain projects are exempt from the air quality conformity process. Exempt projects have little to no impact on air quality or address a safety issue. Projects that are expected to have an impact on air quality are classified as Non-Exempt and need a project-specific analysis. OCTC works cooperatively with the NYSDOT to conduct the required emissions analysis and develop documentation, which is then submitted to the FHWA, FTA, and USEPA in the form of a Conformity Statement.

Concurrent with the publication of this plan, the OCTC is in the NY-NJ-CT Maintenance Area for Fine Particulate Matter (PM 2.5) and in the Poughkeepsie-Newburgh Ozone Non-Attainment Area (PONA). The required work products make up the Core Function of the MPO and require adherence to specific guidelines, as detailed in Table 2: Work Products & Procedures. The OCTC will consider the impact of other planning activities that are affected by transportation, including State and local planned growth, economic development, tourism, natural disaster risk reduction, environmental protection, airport operations, and freight movements when developing the TIP and LRTP. The OCTC will consult with the responsible agencies and officials as appropriate. For more information on coordination and the development process of the TIP and LRTP, see the OCTC Operating Procedures.

For more information regarding the public participation process as it relates to the UPWP, TIP, LRTP, and ACQ, please see the OCTC Operating Procedures.



Graphic 1: The Transportation Planning Process
Graphic provided by the Federal Highway Administration (FHWA)

Table 2: Work Products and Procedures

Major Activities or Programs	Participation Procedure	Public Review Period	Update Cycle
Air Quality Conformity (AQC)	The Conformity Determination will be introduced to the Planning Committee, giving the Committee and public the opportunity to comment. The final document will then be issued for the public comment period. All public comments received will be summarized in the final document. The update cycle is determined by actions that could affect regional emissions, and therefore accompany an LRTP and TIP update. When AQC is triggered by another agency in the non-attainment or maintenance area, and OC does not have any significant updates, members will be notified and provided the document for review and comment if a Planning Committee meeting is unable to be held before public comment is set to begin.	30 Days	As Needed
Public Participation Plan (PPP)	The PPP update will be shared with stakeholders before a Planning Committee meeting discussion, with the final draft being made available for public comment before adoption. All public comments received will be summarized and included in the final version as an appendix.	45 Days	5 Years
Long Range Transportation Plan (LRTP)	Public in-person and/or virtual meetings will be held around the County to discuss issues, goals, and potential actions and recommendations during the update process. These meetings will be held at various times of the day to accommodate availability, with all public meeting notices and relevant materials made available on the website and shared directly with those included on the OCTC Contact List. All public comments will be summarized and included in the final LRTP as an appendix.	30 Days	4 Years
LRTP Amendments	Amendments to the LRTP will be discussed by the Planning Committee and made available for public comment.	30 Days	As Needed
Transportation Improvement Program (TIP)	A specific TIP update meeting will be held by the Planning Committee to discuss the TIP development process, projects on the existing TIP, and proposed projects being considered for addition to the TIP before public comment begins. The public will be notified 7 days before the meeting occurs and will be notified when the public comment period begins.	14 Days	2-3 Years
TIP Amendments	Amendments and modifications made to the TIP will be presented at a Planning Committee meeting. The public will be notified 7 days before the meeting and will be notified of the 14-day public comment period for TIP Amendments and 30-day public comment period for TIP amendments that require an air quality conformity determination before it begins.	14 Days OR 30 Days	As Needed
Unified Planning Work Program (UPWP)	The annual UPWP update will be discussed during a Planning Committee meeting(s), giving the public the opportunity to comment. The draft UPWP document is made available for public review and comment 14 days before adoption.	14 Days	Annually
UPWP Amendments	Amendments and modifications made to the UPWP will be presented at a Planning Committee meeting. The public will be notified 7 days in advance of the meeting and will be notified of the 14-day public comment period before it begins.	14 Days	As Needed

Participation Procedures

Public Notice

Public Notice is a mechanism for the OCTC to inform the public of public participation activities. The OCTC provides the opportunity to comment at key decision points of the transportation planning process, including during the development and before the adoption of major activities and programs, as well as at all Planning Board, Policy Committee meetings and special meetings.

The public will be notified no less than 7 days before a public meeting occurs, including information on the meeting date, time, location, and purpose/topic of the meeting. The public will be notified at the beginning of every public comment period with information on the dates of the public comment period, the purpose/topic, and information on how to submit public comment.

Public Comment

Public Comment is an opportunity for the public to provide input at key decision points during the transportation planning process. The MPO accepts public comments at all regular Policy Board and Planning Committee meetings. Comments may be verbal or submitted in writing. Submitted written comments will be accepted until the calendar day before the meeting and will be read during the meeting.

A summary of any written comments received during a public comment period are prepared by OCTC staff and shared with the Policy Board prior to taking action. Technical clarifications and other questions are answered by OCTC staff or TIP project sponsors as appropriate.

The LRTP and TIP have specific public participation requirements when being updated. Comments received during the public comment period will be considered and summarized in an appendix as appropriate. When significant written and oral comments are received on the draft LRTP or TIP as a result of the participation process or the interagency consultation process required under the EPA transportation conformity regulations, a

summary, analysis, and/or report on the disposition of comments shall be made as part of the final documents.

A new public comment period will be issued in the event that the final LRTP or TIP differs significantly from the version that was made available for public comment by the MPO and raises new material issues that interested parties could not reasonably have foreseen from the public involvement efforts.

Submitting Public Comment

All written comments must be submitted to OCTC staff at the Orange County Planning Department via email to OCTC@orangecountygov.com or mailed to the following address:

Orange County Transportation Council Attn: OCTC Director 124 Main Street Goshen, NY 10921

For assistance submitting written public comment, call OCTC Staff at 845-615-3840.

Other MPO Functions

Outside of the core work products, the MPO undertakes other transportation planning work efforts that look at both the short and long-term issues facing the county and region. These work efforts can include things like studies, analyses, and policy development. There is no prescribed public review period or update cycle for these planning initiatives, but they do offer the opportunity to develop a unique public participation strategy that best meets the goals and target audience of the study or activity. When appropriate, a specific schedule and plan for public participation will be developed for these work efforts independently. The OCTC will direct staff and consultants to the **Public Participation Process** and Outreach Toolbox to ensure all planning activities, programs, and study/plans match a consistent public participation template and similar strategies are deployed.

Nondiscrimination Policy Statement & Complaint Procedure

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

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

The Orange County Transportation Council is committed to providing full and equal access to participation in planning activities for all county residents regardless of abilities and will work to eliminate any barriers to such access and participation through reasonable accommodation as needed.



OCTC's commitment to nondiscrimination includes the following practices:

- The MPO website and all project websites will be ADA accessible and have the ability to be translated, for example through free online services like Google Translate.
- Projects or Studies that directly affect areas with high LEP populations will provide translated meeting materials, as appropriate and feasible.
- Translation services will be provided to individuals at public or virtual meetings to individuals who request it no less than (5) days prior to the meeting.
- All in-person public meetings will be held at ADA accessible locations and will provide assistance to individuals with disabilities who request it no less than (5) days prior to the meeting.
- In-person public meetings will be held within three quarters (3/4) of a mile of public transportation routes or stops as feasible, or the MPO will provide alternative opportunities for virtual public participation with a call-in option.
- Plain language and visualization techniques will be used to help the public understand transportation issues and outreach materials.
- The OCTC will strive to ensure any visualization techniques such as maps, charts, and graphics are understandable for color-blind individuals.

As outlined in the Title VI regulations, OCTC is adopting the following Nondiscrimination Policy and complaint procedure. The Nondiscrimination Policy language will be uploaded to the OCTC website and incorporated into all major work products and plans in the future.

See **Appendix A** for more information on regulations and how OCTC meets the federal guidelines.

ORANGE COUNTY TRANSPORTATION COUNCIL TITLE VI POLICY STATEMENT

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

<u>Additional Information:</u>

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

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

If information is needed in another language, please contact OCTC Staff at OCTC@ orangecountygov.com or call (845) 615-3840.

Complaint Procedures:

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

For help accessing the complaint form, please contact the OCTC Staff at the Orange County Department of Planning at 845-615-3840.

Part 2

Public Participation Process

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

Purpose Statement

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

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

- Increases awareness and understanding in the transportation planning process;
- Offers complete information and timely public notice;
- Supports early and continued involvement of all stakeholders; and
- Provides opportunities for meaningful involvement and citizen feedback.



Goals

The MPO strives to provide the public and interested parties with the opportunity for meaningful involvement in the development of its plans and programs.

The OCTC developed six goals to guide and define the public involvement process:

Provide accessible and continuing opportunity for involvement and participation in the transportation planning process.

- Create a predictable and easy-to-understand process for public involvement that encourages open and meaningful participation.
- Ensure early public involvement in transportation planning activities and maintain engagement throughout the process.
- Provide timely notice for the public to review and comment on major plans, programs, and activities.
- Provide reasonable public access through multiple platforms to information in formats and languages that are clear, concise, and understandable.
- Consider accessibility, time and location when scheduling in-person public input opportunities.
- Provide information that enables participants to clearly understand the respective proposal, plan, or project.
- Ensure that all decisions made are documented clearly and shared publicly, if necessary.
- Routinely evaluate the process to monitor the effectiveness of the methods used to involve the public in the transportation planning process, and make changes as needed.

Incorporate equity into the public involvement process, particularly for populations that are considered underserved and underrepresented.

 Improve accessibility to the transportation planning process by holding in-person meetings at convenient dates, times, and locations.

- Use best practices to identify historically disenfranchised and transportation vulnerable people, including minority, low income, disabled, limited-English proficiency, elderly, and zero-car households.
- Explore creative techniques and technologies to engage hard-to-reach audiences or groups that may be adversely affected by proposed projects and encourage interaction throughout the planning process.
- Work to actively eliminate barriers to full participation for underserved and underrepresented populations and aim to celebrate and foster ethnic, cultural, economic, and biological diversity.

Coordinate public involvement & consultation processes with federal, state, & local agencies, as applicable, to reach a larger audience and minimize costs and redundancies.

- Engage government representatives and partner agencies to create a culture of collaboration that encourages innovation, sharing of resources, and jointly shared accountability for results.
- Coordinate with other local, federal and statewide public involvement processes in order to enhance public consideration of issues, plans and programs.
- Work collaboratively with agency partners to coordinate project-specific information to stakeholders.
- Include opportunity for consultation as needed.

Encourage public involvement though effective outreach strategies.

- Provide a variety of ways to become involved.
- Make use of graphics and visualization techniques to enhance understanding.
- Allow flexibility and resilience of the process to adapt to social, economic, and environmental changes.
- Remain open to using new strategies and technologies for meaningful interaction and communication.

Educate and inform the public about transportation planning issues and processes to create a forum that allows for meaningful participation and involvement by citizens and stakeholders.

- Encourage all citizens, stakeholders, and transportation users to provide input and participate in the planning process.
- Ensure a proactive planning process by providing full and open access to the OCTC through utilization of multiple information sharing resources and platforms.
- Ensure stakeholders and other interested parties are provided the opportunity to review and comment on all significant MPO plans, programs, projects and activities. This includes ensuring availability of an opportunity to comment on the OCTC Public Participation Plan prior to its approval.

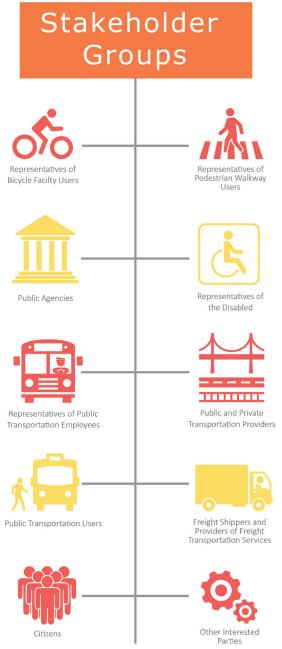
Incorporate feedback received from the public for consideration and incorporation, as appropriate, into transportation plans, programs, or projects.

- Respect the information, opinions and comments received during the public engagement process, and incorporate input in the process when reasonable.
- Document comments received in the public participation process for project, plans, and programs. Share comments with implementing agencies for their consideration to help build public support for a project, as needed, and make available online.
- Continue to evolve and include new avenues of communication to inform the MPO's public outreach initiatives.

Stakeholders

As part of the Public Involvement Process, it is the MPO's responsibility to provide interested parties (referred to by the OCTC as stakeholders) with reasonable opportunities to be involved in the

transportation planning process, as mandated in 23 CFR 450.210(a) and 450.316(a). The regulation states that interested parties include citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties.



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

Diversity & Inclusiveness

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

The OCTC recognizes that in order to have an equitable outreach process, an environment of inclusivity must be created. Part of implementing that process means recognizing the barriers to public involvement. Based on previous outreach experience, the OCTC recognizes the need to seek diverse and fair representation, increase public understanding of the

OCTC and its role in the present and future transportation network, and continue to foster public trust in the transportation planning process.

The OCTC will work with stakeholders to develop relationships in communities where barriers are identified and will seek to build meaningful community partnerships that will help build trust in the MPO and the transportation planning process.

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

The MPO uses census data and mapping tools and techniques to locate specific (census tract level) areas within Orange County that have populations of the Hard-to-Reach population indicators above the County average.

These maps are found in *Appendix B: Maps of Community Demographics* and can be referenced when considering outreach strategies across different communities in Orange County. The OCTC will update the Maps of Community Demographics as data becomes available.



Created by the Robert Wood Johnson Foundation

Table 3: Strategies for Involving Hard-to-Reach Communities

Indicator	Barriers	Strategies									
Traditionally Underserved											
Minority Individuals that identify racially as Black or African American, Asian, Native Hawaiian or Pacific Islander, Native American, Other, or Two of More Races. Hispanic or Latino is not considered a race in the American Community Survey (ACS).	Historically disenfranchised Limited trust in transportation process and government agencies	 Peer-to-Peer Workshops: engage community leaders, groups and businesses that have established trust with community Hold public involvement activities at nongovernmental institutions (library, local business, community center, public school, educational and religious facilities, etc.) Embed education into the process through surveys and utilize visualization techniques. 									
Low-Income Households with Income less than 50% of the Median Household Income (MHHI) for the County. The MHHI is approximately \$80,000 in 2019, making the threshold <\$40,000. This definition, versus using poverty level, is a better local determinant of low-income households for the area.	 Limited time or resources to access and/or participate in meetings or activities Unpredictable work hours Limited access to broadband / computers 	 Increase access and availability of information through local businesses and community centers Hold public meetings outside of regular work hours or provide basic necessities such as food, water, and childcare assistance at in-person meetings to help remove barriers for attendance Use VPI strategies to extend opportunities online, including mobile content for individuals without home broadband access 									
Transportation Vulnerable											
Limited-English Proficiency Individuals that speak English "less than very well".	 Limited understanding of English language Limited understanding of transportation process 	 Peer-to-Peer Workshops: engage community leaders, groups and businesses that have established trust with community Offer translation services at in-person and online public involvement activities Share project information for dissemination with multi-lingual media outlets such as newspapers or radio stations Use infographics and other visualization techniques to limit required reading during presentations 									
Age 65+ Individuals aged 65 years or older	Limited mobility Limited understanding or use of technology	 Provide supplemental strategies when using technology Work with local Senior Centers or hold events during senior hours to target 65+ population Use infographics and other visualization techniques to limit required reading during presentations 									

Table 3: Strategies for Involving Hard-to-Reach Communities (continued)

Indicator	Barriers	Strategies
Individuals with Disabilities Individuals living with mobility and sensory disabilities including low vision/blind, hard of hearing/deaf, cognitive, self- care and independent living challenges.	 Limited mobility Limited sensory perception which impedes ability to access meetings or materials Limited participation without assistance or reasonable accommodation 	 Ensure that all staff are trained in inclusive participation and able to implement corresponding practices Increase physical accessibility by ensuring meeting venues comply with the Americans with Disabilities Act (ADA) Accessibility Standards as issued by the Department of Justice (DOJ) and the Department of Transportation (DOT) for places of public accommodation. Utilize Virtual Public Involvement (VPI) strategies to extend opportunities online and provided closed captioning and/or sign language services and other user-friendly formats for people with disabilities. Utilize a website design, registration processes, and pre-event communications which are accessible and user friendly for people with disabilities. Ensure that an accessibility statement is included on all publicity materials (poster, flyers, emails, and web postings).
Zero Car Households Households that report access to Zero cars. Often used as a metric for transit-reliant households.	Limited accessibility Reliant on Multimodal transportation	 Increase accessibility to meetings and materials by holding meetings near transit services Use VPI strategies to extend opportunities online, including mobile content Offer alternative access to in-person meetings including call-in options
Educational Attainment Less than High School Individuals with an Educational Attainment of Less than High School. This does not include individuals with greater than or equal to a High School diploma or the equivalent (GED).	 Limited understanding of the transportation planning process Literacy may be lower than 8th grade level 	 Use plain language and visualization techniques to help individuals understand transportation issues or upcoming projects and programs. Use infographics and other visualization techniques to limit required reading during presentations Utilize easy to understand language and limit length and complexity of public meetings

Strategies for Outreach

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

Outreach Toolbox

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

	Inform	Consult	Involve	Collaborate	Empower
Goal	Provide balanced and objective information in a timely manner. We will keep you informed. Work with the public to make sure that concerns and aspirations are considered and understood. We will keep you informed. We will listen to and ackowledge your concerns and aspirations are considered are considered.			Partner with the public in each aspect of the decision-making.	Place final decision-making in the hands of the public.
Promise		and ackowledge	•	We will look to you for advice and innovation and incorporate this in decisions as much as possible.	We will implement what you decide.

Increasing Level of Public Impact

Table 4: IAP2's Spectrum for Public Participation

Identifying Goals for Outreach

The International Association for Public Participation's (IAP2) Spectrum of Public Participation is an internationally recognized approach to public engagement and is used widely to guide the public participation process. It is designed to assist with the selection of the level of participation that defines the public's role in any public participation process. The public's impact on decision making increases from left to right. The Spectrum of Public Participation is a comprehensive approach to understanding specific goals and objectives for public participation; it has been integrated with the Outreach Strategies in Table 5: Strategies for Public Participation as a guide to help identify the best fit strategy for public engagement based on the outreach goal and promise to the public.

Geographic Scale

The community demographics and scale of the project will also affect the overall success of a strategy and should be considered when identifying the best-fit-tool for engagement. Both projects that have an extensive geographic boundary and projects that are smaller and more localized benefit from strategies that use Virtual Public Involvement (VPI) tools. VPI expands outreach and engagement from traditional in-person only events and allows those who might otherwise have an issue, conflict, or unease about attending to participate. While VPI is a great tool, in-person strategies that bring participation opportunities to people are invaluable to the outreach process. Tools like pop-up events allow individuals to have meaningful conversations about issues or impacts face-to-face with the project team and are beneficial for more localized projects.

Target Audience

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

Figure 3: Strategies Selection Process



Barriers to Public Participation

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

Table 5: Strategies by Public Participation Goal

	Inform	Consult	Involve	Collaborate	Empower
STRATEGIES	 Contact List MPO Website Notices Project-Specific Websites Public Hearings Public Meetings Pop-up Events Social Media Newsletter Interactive Mapping Visualizations Transit Advertisements Videos & PSAs 	 Project-specific websites Public Workshop or Open House Public Hearings Partner Agency Coordination Stakeholder/ Focus Group Public Meetings Surveys & Live Polling Meeting-in-a-box Pop-up Events Charrettes 	 Project-specific websites Stakeholder/ Focus Group Steering/ Technical Committees Public Workshop or Open House Public Meetings Crowdsourcing 	 Partner Agency Coordination Steering/ Technical Committees 	• Charrettes

List of Strategies

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

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

Core Techniques to Inform

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

Contact List

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

MPO Website

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

Notices

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

Project-Specific Websites

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



The West Central Transportation and Land Use Study (West Central TLC) Project-Specific Website was used to connect with the public, share information about the project, and inform interested citizens and stakeholders on ways to get involved with the study.



In-person Techniques for Involvement and Feedback

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

Steering/Technical Committees

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

Public Workshop or Open House

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

Public Hearings

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

Partner Agency Coordination

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



In 2019 the OCTC used Public Workshops to involve the public in forming the goals and policies adopted in the Long Range Transportation Plan (LRTP) 2045 update.

Attendees were encouraged to walk around at their own pace, interact with the project team at different stations, and learn more information about the project through presentation boards.



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

Public Meetings

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

In-person Community Outreach Techniques to Enhance Participation

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

Pop-up Events

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

Surveys

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

Interactive Mapping & Crowdsourcing

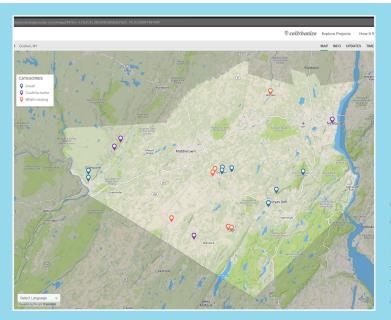
Maps may be used for specific projects to gather feedback from the public on local priorities and needs, or to present current and future projects in the region. Maps may be available through the OC GIS Portal, Arc Online, OCTC and/or project website, or printed. Interactive mapping can also be used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

Presentations and Graphics (Visualization Techniques)

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

Charrettes

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



Special Techniques to Enhance Participation

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

Social Media

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

Videos

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



CoUrbanize was used as an interactive mapping and crowdsourcing tool for the Orange County Comprehensive Plan Update (2018). Users were able to drop a pin at a location and leave a comment, or text in comments on different aspects of the Comprehensive Plan elements, including transportation. These comments helped the project team understand localized concerns and aspirations for the future of Orange County.

Meeting-in-a-Box

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

Newsletter

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

Live Polling

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

Flyers, Handouts, & Fact Sheets

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

Press Releases & Media Packets

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

Video & Audio Public Service Announcements (PSAs)

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

Transit Advertisements

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



The Orange County Department of Planning maintains an online newsletter that is currently distributed to over 500 subscribers. Interested parties can subscribe online through the website or by contacting OCTC Staff for assistance.

MPO Staff use this online platform to share informative articles that keep readers up-to-date on ongoing MPO projects, transportation trends, and issues in Orange County.

Monitoring & Evaluation

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

The effectiveness of this public participation plan will be reviewed based on the following criteria:

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

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

- Number of participants and comments received during review periods.
- Total interactions through informative strategies, including newsletter subscribers, social media interactions on posts, and subscribers to OCTC notices.
- Number of community events participated in, particularly in geographic areas identified to have high rates of hard-to-reach populations.

 Overall socio-economic and demographic data for participants reflects a similar representation of the target community, when available and feasible.

Metrics will be tracked internally by OCTC staff, and a summary of public participation activities will be reported to the public as part of the annual UPWP update under "Program Highlights".

Update Procedure

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

Minor modifications to the PPP include changes to the public involvement tools and strategies, revision of references to applicable regulations, misspellings, omissions or typographical errors. Staff performs these updates, with no notification required. Amendments to the PPP include any other changes that do not fit the minor modification definition and require a 45-day public comment period. For additional information about OCTC or the Public Participation Plan, please visit orangecountygov.com/octc or email OCTC@orangecountygov.com.

Last updated October 12, 2021.

APPENDIX A

Federal and State Regulations

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Federal & State Legislation

New York State Open Meetings Law

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

Sunshine Act

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

Public Interest

Based on 23 USC 109 (h) MPOs and Sub-Recipients of federal funding must assure that possible adverse economic, social, and environmental effects relating to any proposed project on any Federal-aid system have been fully considered in developing such project, and that the final decision on the project are made in the best overall public interest, taking into consideration the need for fast, safe and efficient transportation, public services and the costs of

eliminating or minimizing such adverse effects and the following: (1) air, noise, and water pollution; (2) destruction or disruption of man-made and natural resources, aesthetic values, community cohesion and the availability of public facilities and services; (3) adverse employment effects, and tax and property values losses; (4) injurious displacement of people, businesses and farming; and (5) disruption of desirable community and regional growth.

Public Participation Regulations

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

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

Executive Order 13175 and Section 106 of the National Historic Preservation Act – Consultation and Coordination with Tribal Governments

Executive Order 13175 states that "in formulating or implementing policies that have tribal implications, agencies shall establish regular and meaningful consultation and collaboration with tribal officials to reduce the imposition of unfunded mandates upon Indian tribes."

In accordance with Section 106 of the National Historic Preservation Act and its revised regulations (36 CFR Part 800), Project Sponsors are required to consult with Indian Tribes regarding undertakings occurring on or affecting historic properties on tribal lands.

There are no tribal lands identified within the OCTC planning area, but some areas in Orange County may have religious or significance to historic properties located off tribal lands. The Stockbridge-Munsee

Community Band of Mohican Indians, Delaware Tribe and Delaware Nation have interest in projects that affect culturally significant areas. In the event that the OCTC's project or activity programming affects tribal land, the OCTC will seek to include tribal leaders as a stakeholder in the transportation planning process.

Nondiscrimination Legislation

Title VI

Title VI of the 1964 Civil Rights Act states that "no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under any program or activity that is a recipient of federal financial assistance." Title VI regulations apply to all organizations (government or not-for-profit) that receive federal funds.

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

Nondiscrimination Statutes

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

Americans With Disabilities Act

The Americans with Disabilities Act, which became law in 1990, states, "... no qualified individual with

a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of services, programs, or activities of a public entity, or be subjected to discrimination by any such entity." It is the first comprehensive civil rights law passed by U.S. Congress prohibiting discrimination against people with disabilities in all areas of public life, including but not limited to, employment, government services, public accommodations, commercial facilities, and transportation.

The Orange County Government, host agency for the OCTC, adopted an ADA Transition Policy in 2017. The OCTC has also integrated non-discrimination policies into its Public Participation Plan. As part of the Public Participation Plan, people with disabilities are identified as a hard-to-reach community. The OCTC reached out to stakeholders to identify potential barriers to public participation and strategies to address the barriers, and integrated the feedback received into the public involvement process.

Executive Order 13166 (Limited-English-Proficiency)

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

Recipients are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. While designed to be a flexible and fact-dependent standard, the starting point is an individualized assessment that balances the following four factors:

- The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee;
- the frequency with which LEP individuals come in contact with the program;
- the nature and importance of the program, activity, or service provided by the program to people's lives; and

 the resources available to the grantee/recipient or agency, and costs.

Consistent with Executive Order 13166 and U.S. Department of Transportation (DOT) guidance, the Orange County Department of Planning, on behalf of Transit Orange and OCTC, has a Limited English Proficiency Plan in order to ensure meaningful input opportunities for persons with limited English proficiency and to establish a process to evaluate OCTC's practices to ensure meaningful access to programs and activities by LEP persons.

Executive Order 12898 (Environmental Justice)

Executive Order 12898 of 1994, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, looks to identify and address "disproportionately high and adverse human health or environmental effects" on low-income and minority populations. Executive Order 12898 evokes similar principles of the Title VI of the Civil Rights Act of 1964. In support of Executive Order 12898, the United States Department of Transportation (USDOT) issued an Order on Environmental Justice (USDOT Order 5610.2) in 1997, followed by a Federal Highway Administration (FHWA) Order on Environmental Justice (FHWA Order 6640.23) in 1998.

The Federal Highway Administration order requires the incorporation of Environmental Justice principles in all FHWA programs, policies, and activities. As a federally funded agency, the OCTC is required to be in compliance with both of these federal regulations.

There are three core Environmental Justice principles:

- Avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority and low-income populations
- Ensure full and fair participation of all potentially affected communities in the transportation decision-making process
- Prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations

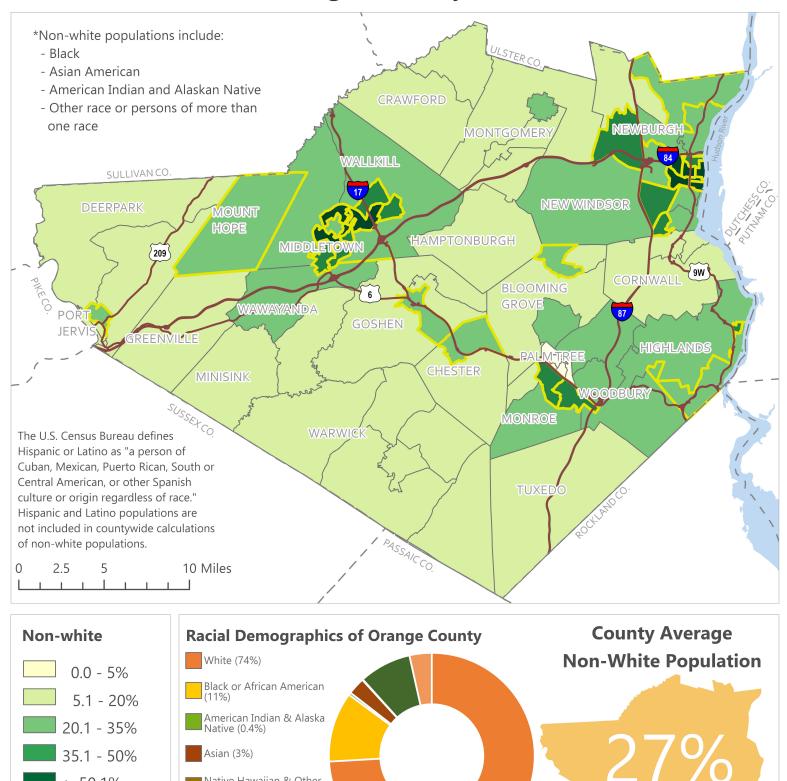
Consistent with Executive Order 12898 and U.S. Department of Transportation (DOT) guidance, OCTC ensures minority and low-income communities are not adversely affected by the transportation planning and programming of projects as part of the Metropolitan Transportation Plan (MTP), Unified Planning Work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

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APPENDIX B

Maps of Community Demographics

Percent of Non-White* Population per Census Tract in Orange County, NY



Asian (3%)

Native Hawaiian & Other Pacific Islander (0.1%)

Some other race (8%)

Two or more races (4%)

35.1 - 50%

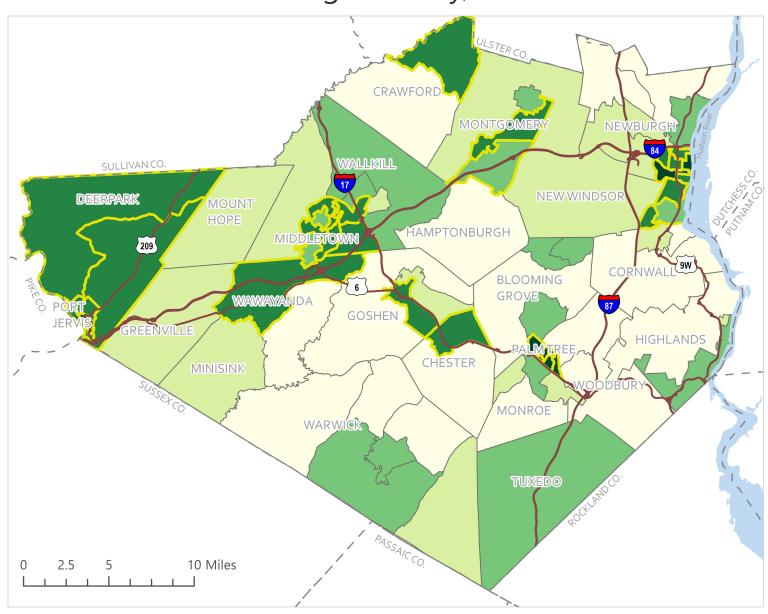
Above county

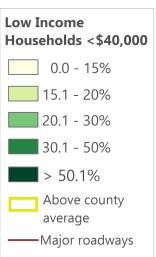
Major roadways

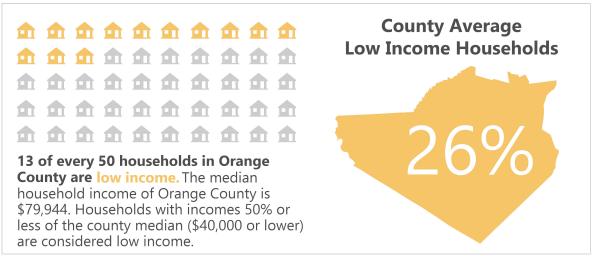
> 50.1%

average

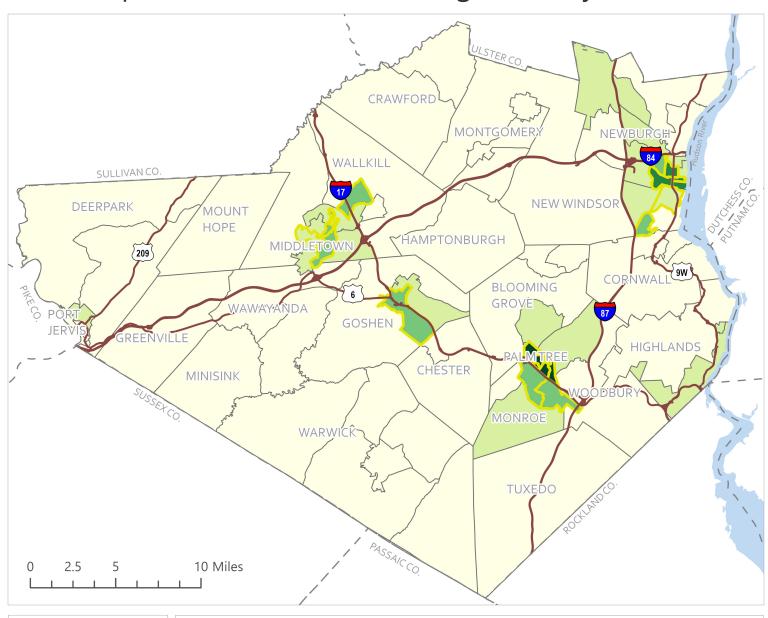
Percent of Low Income Households per Census Tract in Orange County, NY

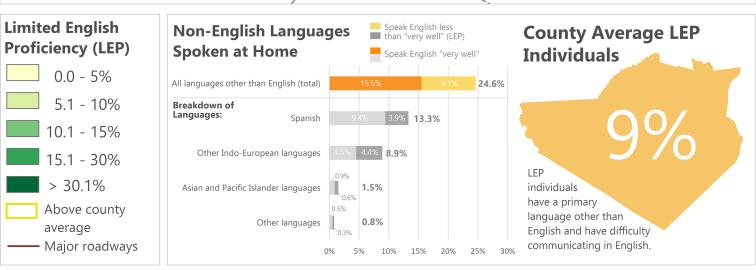




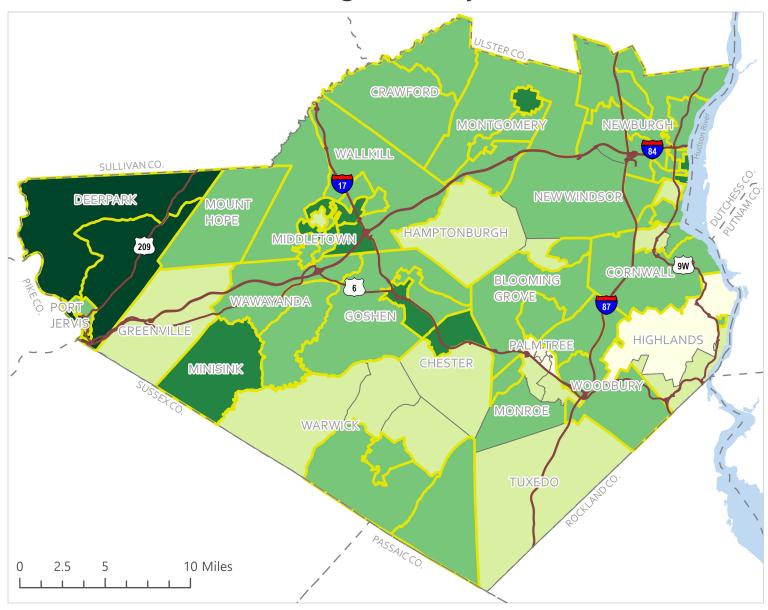


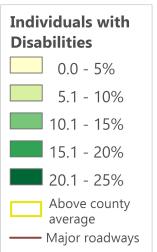
Percent of Limited English Proficiency (LEP) Individuals per Census Tract in Orange County, NY

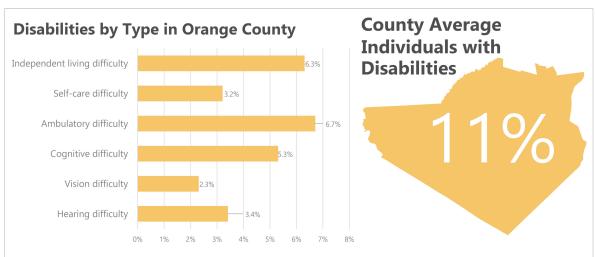




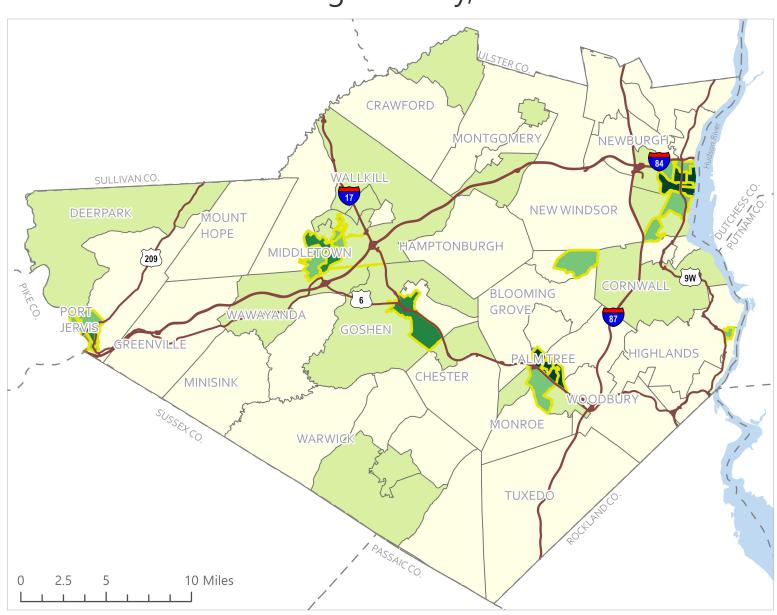
Percent of Individuals with Disabilities per Census Tract in Orange County, NY

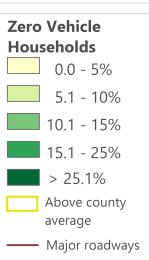


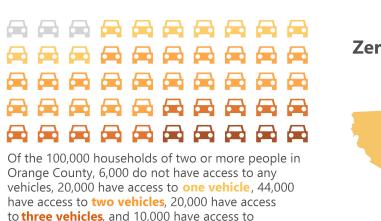




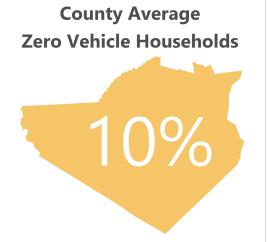
Percent of Zero Vehicle Households per Census Tract in Orange County, NY





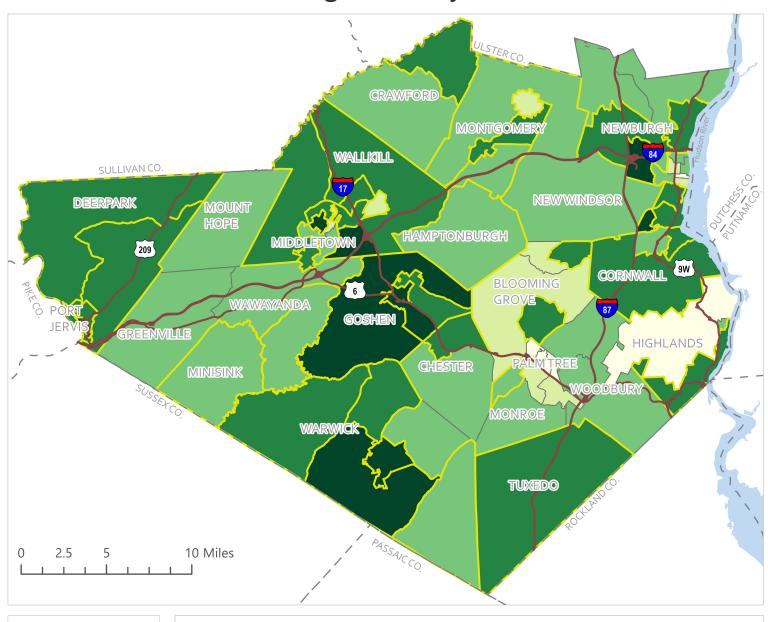


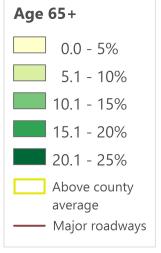
= 2,000 zero-vehicle households

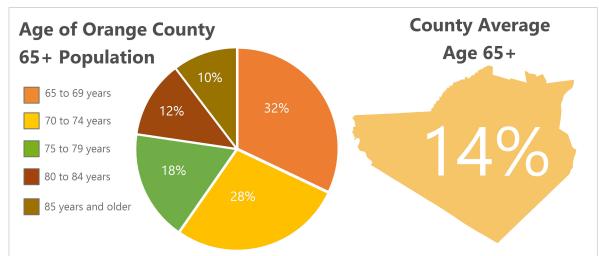


four or more vehicles.

Percent of Population 65 and Older per Census Tract in Orange County, NY

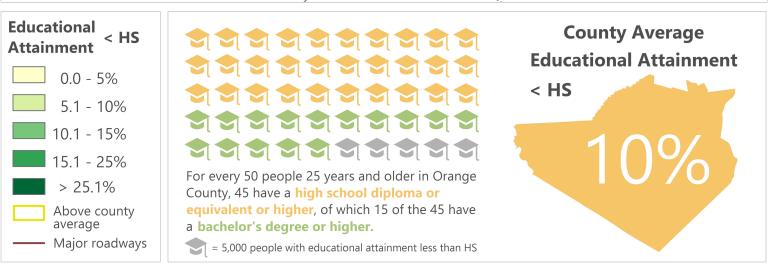






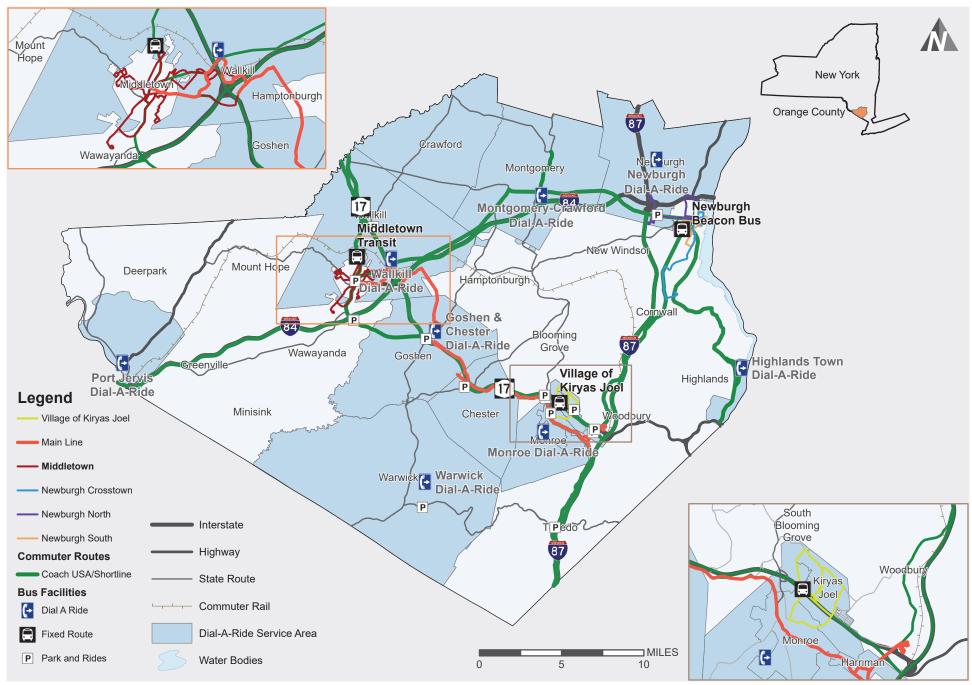
Percent of Individuals with Educational Attainment less than High School Diploma per Census Tract in Orange





Attachment F: Transit Basemap







FIGURE

Attachment G1: Fixed Transit Bus Roster



Date Roster Updated - 5/13/2024 Name and Telephone Number of Person Completing Roster - Rob Parrington 845-615-3852

Name of Applicant - County of Orange Name of Transit Operator - Orange County Public Transportation System Statistics as of dates noted All vehicles listed are titled to the County of Orange
For any buses purchased with Federal Section 5307, 5308, or 5311 funds the funding was 80% Federal, 10% State, 10% Local
For any buses purchased with Federal ARRA funds the funding was 100% Federal

								Date		Chassis Serial			1		Condition							Date						
	Official			License	County		Chassis	Delivered	Original	Number	Туре				Reported	Date		Date	Source	State	Local	Vehicle	Useful	Year		State		
Lessee	Fleet	Vehicle	Model	Plate		Operator's	Serial	to Original	Purchase	of Bus	of		wc	Fuel	By	Condition		Mileage	of	Funds	Funds	Placed in		teplaceme	NYSDOT	Contract	Federal	County
(Operator)	Size	Make	Year	Number	Tag No.	ID No.	Number	Operator	Price	Replaced	Service	Seats	Seats	Type	Operator	Reported	Mileage	Recorded	Funds	Used?	Source	Service		Due	PIN	Number	Grant No.	Proj. No.
Hudson Transit Lines	28	Gillia	2013	24727BB		901	15GGE3018D1092543	6/17/2013	\$575,291,00	1T7KL2B2321110048	FR	28	2	HD	Good	2/20/2018	280.878	7/28/2023	ARRA	No.	n/a	6/17/2013	12 years	2025	n/a	n/a	NY-96-X014	CP401
66 Tetz Road		Gillia	2013	24728BB		902	15GGE301XD1092544		\$575,291.00	1T7KL2B2X21110046	FR	28	2	HD	Good	2/20/2018	285.547	7/28/2023	ARRA	No	n/a	6/17/2013	12 years	2025	n/a	n/a	NY-96-X014	CP401
Chester, NY 10918		Gillia	2013	_	D1064	903	15GGE3011D1092545	6/17/2013	\$575,291.00	1T7KL2B2X21110047	FR	28	2	HD	Good	2/20/2018	275,300	7/28/2023	ARRA	No	n/a	6/17/2013	12 years	2025	n/a	n/a	NY-96-X014	CP401
Citebiei, NT 10510		Gillig	2022	24350BT		97601	15GGB2718N3197601	7/18/2022	\$506.117.00	15GCB211571112586	FR	32	2	n n	Excellent	10/27/2022	41.958			Yes	Oper.	10/24/2022	12 years	2023	8.TRO.85	K007397	NY-2019-046-00	CP 482
		Gillia	2022	24351BT		97602	15GGB271XN3197602		\$506,117.00	15GCB211371112587	FR	32	2	D	Excellent	10/27/2022		4/30/2024		Yes	Oper.	10/24/2022	12 years	2034	8.TRO.85	K007397	NY-2019-046-00	CP 482
		MCI D4500	2022		E7638	16623	1M8D2W914PP106111	2/10/2023	\$561,147.80	1M8PDMPA85P056535	Comm	56	2	D	Excellent	2/10/2023		2/10/2023	Sec. 5307	Yes	Oper.	4/19/2023	12 years		8TRO.90.001	K007397	NY-2019-046-00	CP 482
		MCI D4500	2023	24383BT		16624	1M8D2W916PP106112		\$561,147.80	1M8PDMPAX5P056536	Comm	56	2	D	Excellent	2/16/2023		2/16/2023	Sec. 5307	Yes	Oper.	3/30/2023	12 years	2035	8TRO.90.001	K007397	NY-2019-046-00	CP 482
		MCI D4500	2023	24396BT		16625	1M8D2W918PP106113	2/21/2023	\$561,147.80	1M8PDMPA15P056537	Comm	56	2	D	Excellent	2/21/2023		2/21/2023	Sec. 5307	Yes	Oper.	5/8/2023	12 years		8TRO.90.001	K007397	NY-2019-046-00	CP 482
		MCI D4500	2023	24390BT		16626	1M8D2W91XPP106114		\$561,147.80	1M8PDMPA66P057037	Comm	56	2	D	Excellent	2/21/2023		2/21/2023		Yes	Oper.	3/29/2023	12 years		8TRO.90.001	K007397 K007397	NY-2019-046-00	CP 482
		MCI D4500	2023		E7642	16627	1M8D2W911PP106115		\$561,147.80	1M8PDMPA86P057038	Comm	56	2	D	Excellent	2/21/2023		2/21/2023		Yes	Oper.	3/30/2023	12 years		8TRO.90.001		NY-2019-046-00	CP 482
		MCI D4500	2023		E7643	16628	1M8D2W913PP106116		\$561,147.80	1M8PDMHA48P057989	Comm	56	2	D	Excellent	2/27/2023		2/27/2023		Yes	Oper.	5/12/2023	12 years		8TRO.90.001		NY-2019-046-00	CP 482
		MCI D4500	2023		E7644	16629	1M8D2W915PP106117		\$561,147.80	1M8PDMHA08P057989	Comm	56	2	D	Excellent	2/27/2023		2/27/2023		Yes	Oper.	3/30/2023	12 years		8TRO.90.001		NY-2019-046-00	CP 482
		MCI D4500	2023			16630	1M8D2W917PP106117		\$561,147.80	1M8PDMHA28P057992	Comm	56	2	D	Excellent	3/6/2023	1,676		Sec. 5307	Yes	Oper.	5/5/2023	12 years		8TRO.90.001		NY-2019-046-00	CP 482
		MCI D4500	2023			16631	1M8D2W917PP106118		\$561,147.80	1M8PDMHA28P057992	Comm	56	2	D	Excellent	3/6/2023	1,688		Sec. 5307	Yes	Oper.	4/28/2023	12 years		8TRO.90.001		NY-2019-046-00	CP 482
				24394B1 24387BT		16632	1M8D2W915PP106120			1M8PDMHA28P057994		56	2	D	Excellent	3/6/2023	2.013					5/5/2023			8TRO.90.001	K007397	NY-2019-046-00	CP 482
		MCI D4500	2023	24387BT		16633	1M8D2W915PP106120		\$561,147.80 \$561,147.80	1M8PDMHA28P057994 1M8PDMHA28P057995	Comm	56	2	D		3/6/2023	1,684		Sec. 5307	Yes	Oper.	3/31/2023	12 years		8TRO.90.001		NY-2019-046-00 NY-2019-046-00	CP 482
									************		Comm		2		Excellent	0.20.000	-,			Yes						K007397		CP 482
		MCI D4500	2023	24373BT		16634	1M8D2W919PP106122		\$561,147.80	1M8PDMHA28P057996	Comm	56	-	D	Excellent	1/26/2023	1,683	1/26/2023	Sec. 5307	Yes	Oper.	3/27/2023	12 years		8TRO.90.001		NY-2019-046-00	CP 482
		MCI D4500	2023		E7650	16635	1M8D2W910PP106123	1/23/2023	\$561,147.80	1M8PDMHA28P057997	Comm	56	2	D	Excellent	1/26/2023	1,728			Yes	Oper.	3/21/2023	12 years			K007397	NY-2019-046-00	CP 482
		MCI D4500	2023	24372BT		16636	1M8D2W912PP106124		\$561,147.80	1M8PDMHA28P057999	Comm	56	2	D	Excellent	1/30/2023	1,699			Yes	Oper.	3/21/2023	12 years		8TRO.90.001		NY-2019-046-00	CP 482
		MCI D4500	2023		E7652	16637	1M8D2W914PP106125		\$561,147.80	1M8PDMHA28P058100	Comm	56	2	D	Excellent	2/9/2023	1,725		Sec. 5307	Yes	Oper.	3/29/2023	12 years		8TRO.90.001		NY-2019-046-00	
		MCI D4500	2023		E7653	16638	1M8D2W916PP106126	2/6/2023	\$561,147.80	1M8PDMHA28P058101	Comm	56	2	D	Excellent	2/8/2023		2/8/2023	Sec. 5307	Yes	Oper.	3/21/2023	12 years		8TRO.90.001		NY-2019-046-00	CP 482
		MCI D4500	2023		E7654	16639	1M8D2W918PP106127	2/6/2023	\$561,147.80	1M8PDMHA28P058102	Comm	56	2	D	Excellent	2/8/2023		2/8/2023		Yes	Oper.	3/30/2023	12 years		8TRO.81.001		NY-2019-024-00	CP 482
		MCI D4500	2023		E7655	16640	1M8D2W91XPP106128		\$561,147.80	1M8PDMHA28P058103	Comm	56	2	D	Excellent	2/10/2023		2/10/2023		Yes	Oper.	4/19/2023	12 years		8TRO.81.001		NY-2019-024-00	CP 482
		MCI D4500	2023	24376BT		16641	1M8D2W911PP106129		\$561,147.80	1M8PDMHA28P058104	Comm	56	2	D	Excellent	1/30/2023		1/30/2023	Sec. 5307	Yes	Oper.	3/21/2023	12 years		8TRO.81.001		NY-2019-024-00	CP 482
		MCI D4500	2023	24368BT		16642	1M8D2W918PP106130		\$561,147.80	1M8PDMHA28P058105	Comm	56	2	D	Excellent	1/19/2023	1,708		Sec. 5307	Yes	Oper.	3/21/2023	12 years	2035	8TRO.81.001		NY-2019-024-00	CP 482
		MCI D4500	2023	24367BT		16643	1M8D2W91XPP106131		\$561,147.80	1M8PDMHA28P058106	Comm	56	2	D	Excellent	1/19/2023	1,686			Yes	Oper.	3/21/2023	12 years		8TRO.81.001	K007397	NY-2019-024-00	CP 482
		MCI D4500	2023		E7659	16644	1M8D2W911PP106132		\$561,147.80	1M8PDMHA28P058107	Comm	56	2	D	Excellent	3/16/2023		3/16/2023		Yes	Oper.	6/5/2023	12 years	2035	8TRO.81.001	K007397	NY-2019-013-00	CP 482
		MCI D4500	2023	24398BT	E7660	16645	1M8D2W913PP106133	3/20/2023	\$561,147.80	1M8PDMHA28P058108	Comm	56	2	D	Excellent	3/20/2023	1,716	3/20/2023	Sec. 5307	Yes	Oper.	4/25/2023	12 years	2035	8TRO.81.001	K007397	NY-2019-013-00	CP 482
					_																							
Kiryas Joel Village	8	Gillig	2013		D1057	21	15GGE3014D1092538		\$575,291.00	1T7KL2E2631131988	FR	28	2	HD	Good	6/27/2013	176,965		Sec. 5307	Yes	Oper.	6/27/2013	12 years		8TRO.39.001		NY-90-X586 &-X593	
500 Forest Road		Gillig	2013	R37964		22	15GGE3016D1092539	6/27/2013	\$575,291.00	1T7KL2E2831131989	FR	28	2	HD	Good	6/27/2013	204,547			Yes	Oper.	6/27/2013	12 years	2025	8TRO.39.001	K006805	NY-90-X593	CP 428
Monroe, NY 10949		Gillig	2013	R37965	D1059	23	15GGE3012D1092540	6/27/2013	\$575,291.00	1T7YN2A2671280398	FR	28	2	HD	Good	6/27/2013	185,077	6/30/2023	ARRA	No	n/a	6/27/2013	12 years	2025	n/a	n/a	NY-96-X014	CP401
		Gillig	2013	R37966	D1060	24	15GGE3014D1092541	6/27/2013	\$575,291.00	1T7YN2A2871280399	FR	28	2	HD	Good	6/27/2013	118,045	6/30/2023	ARRA	No	n/a	6/27/2013	12 years	2025	n/a	n/a	NY-96-X014	CP401
		Gillig	2013	R37967	D1061	25	15GGE3016D1092542	6/27/2013	\$575,291.00	1T7KL2B2811101358	FR	28	2	HD	Good	6/27/2013	130,008	3/24/2023	ARRA	No	n/a	6/27/2013	12 years	2025	n/a	n/a	NY-96-X014	CP401
		Gillig	2013	R37974	D1065	26	15GGE3013D1092546	6/27/2013	\$575,291.00	n/a - addition to fleet	FR	28	2	HD	Good	6/27/2013	157,044	6/30/2023	ARRA	No	n/a	6/27/2013	12 years	2025	n/a	n/a	NY-96-X014	CP401
		Gillig	2022	BF9839	E6417	36	15GGE2716N3093762	8/20/2022	\$506,117.00	n/a - addition to fleet	FR	24	2	D	Excellent	10/27/2022	3,094	10/27/2022	Sec. 5307	Yes	Oper.	9/6/2022	12 years	2034	8.TRO.85	K007397	NY-2019-046-00	CP 482
		Gillig	2022	BF9840	E6418	37	15GGE2718N3093763	8/23/2022	\$506,117.00	n/a - addition to fleet	FR	24	2	D	Excellent	10/27/2022	3,174	10/27/2022	Sec. 5307	Yes	Oper.	9/6/2022	12 years	2034	8.TRO.85	K007397	NY-2019-046-00	CP 482
Newburgh Beacon	8	Gillig	2013			217	15GGB3015D1182516		\$581,360.00	n/a - addition to fleet	FR	32	2	HD	Poor	6/21/2013	266,071	4/7/2023	ARRA	No	n/a	6/21/2013	12 years	2025	n/a	n/a	NY-96-X014	CP401
100 Leprechaun Lane		Gillig	2013	24725BB	_	219	15GGB3017D1182517		\$581,360.00	n/a - addition to fleet	FR	32	2	HD	Poor	6/21/2013	192,960		ARRA	No	n/a	6/21/2013	12 years		n/a	n/a	NY-96-X014	CP401
New Windsor, NY 12553	l	Gillig	2013	AC8704		221	15GGB3019D1182518		\$581,360.00	n/a - addition to fleet	FR	32	2	HD	Poor	6/21/2013	211,450	8/31/2022	ARRA	No	n/a	6/21/2013	12 years	2025	n/a	n/a	NY-96-X014	CP401
		Gillig	2013	AC8705	D1054	223	15GGB3010D1182519	6/21/2013	\$581,360.00	n/a - addition to fleet	FR	32	2	HD	Poor		2,202,618	2/10/2023	ARRA	No	n/a	6/21/2013	12 years	2025	n/a	n/a	NY-96-X014	CP401
	l	Gillig	2013	AG8538	D1055	225	15GGB3017D1182520	6/21/2013	\$581,360.00	n/a - addition to fleet	FR	32	2	HD	Poor	6/21/2013	2,332,289	4/3/2023	ARRA	No	n/a	6/21/2013	12 years	2025	n/a	n/a	NY-96-X014	CP401
		Gillig	2013	AC8706	D1056	227	15GGB3019D1182521	6/21/2013	\$581,360.00	n/a - addition to fleet	FR	32	2	HD	Poor	6/21/2013	277,716	4/14/2023	ARRA	No	n/a	6/21/2013	12 years	2025	n/a	n/a	NY-96-X014	CP401
	l	Gillig	2022	21796BT	E6421	229	15GGB2711N3197603	8/11/2022	\$508,937.00	15GCB211571112588	FR	32	2	D	Excellent	10/27/2022	20,255	4/14/2023	MEP	Yes	n/a	8/23/2022	12 years	2034		K007397	n/a	CP 501S
			2022	21797BT	E6422	231	15GGB2713N3197604	8/11/2022	\$508,937,00	15GCB211771112589	FR	32	2	D	Excellent	10/27/2022	15,877	2/9/2023	MEP	Yes	n/a	8/26/2022	12 years	2034		K007397	n/a	CP 501S

44

DR = Demand-Responsive, FR = Fixed-Route, DFR = Deviated Fixed-Route

Attachment G2: Dial-A-Ride Roster



PART III. DIAL-A-BUS VEHICLE ROSTER AND REPLACEMENT SCHEDULE

Name of Applicant - County of Orange Name of Transit Operator - Orange County Public Transportation System Statistics as of dates noted All vehicles listed are titled to the County of Orange For any buses purchased with Federal Section 5307, 5309, or 5311 funds the funding was 80% Federal, 10% State, 10% Local For any buses purchased with Federal ARRA funds the hunding was 100% Federal

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

Date Roster Updated - 5/13/2024

	1	Date Chassis Serial								1														1							
	Official			License	County		Mfg.	Chassis	Delivered	Original	Number	Туре					Reported	Date		Date	Source	State	Local	Vehicle	Useful	Year		State			
Lessee	Fleet	Vehicle	Model	Plate	Inventor	Operator	Body	Serial	to Origina	Purchase	of Bus	of		wc	Total	Fuel	By	Condition		Mileage	of	Funds	Funds	Placed in	Life	eplaceme	NYSDOT	Contract	Federal	Added to	County
(Operator) Where Buses are Kept	Size	Make	Year	Number	r Tag No.	Bus#	Number	Number	Operator	Price	Replaced	Service	Seats	Seats	Capacity	Type	Operator	Reported	Mileage	Recorded	Funds	Used?	Source	Service		Due	PIN	Number	Grant No.	TransAM?	Proj. No.
Goshen-Chester DAR	2	Ford	2021	BE5219			7571	1FDEE3FK8MDC175		\$78,915.00	IFDFE4FS9CDA67409	DR	12	2	13	G	Excellent	4/19/21	20,706		Sec. 5311		Oper.	07/20/21	5 Years	2026	8TRO79/8TRO84		n/a	Yes	CP 542 / CP 48:
44 Police Drive		Ford	2021	BE5218	E5274	13	7572	1FDEE3FKXMDC175	35 04/19/21	\$78,915.00	1FDFE4FS2FDA06889	DR	12	2	13	G	Excellent	4/19/21	22,393	04/11/23	Sec. 5311	Yes	Oper.	07/15/21	5 Years	2026	8TRO79/8TRO84	C004131	n/a	Yes	CP 481 / CP 483
Goshen, NY 10924			_		_				_																						
Highlands DAR	1	Ford	2018	BB9011	F1/26	26	51600	1EDEE3ES4 IDC310	23 12/17/18	\$71.651.04	1FDFE4FS6CDB09289	DR	12	2	13	G	Evcellent	04/08/19	50 703	07/28/23	NYSMED	Yes	N/A	04/08/19	5 Veere	2024	8TRO 81 001	K007233	NY-2017-024-00	Yes	CP501
1530 Route 9W	1 '	100	2010	DD0011	11420	10	01000	II DEEDI OADDOOTO	12/1//10	ψ/1,001.04	11 21 241 0002200		- "-				LACCION	04/00/20	00,700	0/120/20	TETO WILL	100	1671	04/00/15	O rouis	2024	01110:02:002	NOU7 EUU	141-2011-024-00	100	0,001
Highland Falls, NY 10928																															
Kiryas Joel DAR	9	Ford	2019			27		1FDEE3FSXKDC149		\$72,635.02	na	DR	12	2	13	G		1/13/120		08/24/23		Yes	Oper		5 Years		8TRO.80.001		NY-2017-024-00	Yes	CP 491
500 Forest Road		Ford	2019	DDIOUZ				1FDEE3FS4KDC526		\$72,635.02	na	DR	12	2	13	G		01/13/20		06/30/23			Oper		5 Years		8TRO.80.001		NY-2017-024-00	Yes	CP 491
Monroe, NY 10950		Ford Ford	2019			29 30	58970	1FDEE3FS9KDC141		\$72,635.02	na na	DR DR	12	2	13	G	Excellent	01/13/20	44 103	06/30/23	Sec. 5339 Sec. 5339		Oper Oper	05/25/20	5 Years		8TRO.81.001	K007233	NY-2017-024-00 NY-2017-024-00	Yes	CP 491 CP 491
		Ford	2019	BD1795		31	65800	1FDEE3FS6KDC5265		\$72,635.02	na	DR	12	2	13	G	Excellent				Sec. 5339		Oper	05/25/20	5 Years		8TRO.81.001	K007233	NY-2017-024-00	Yes	CP 491
		Ford	2019	BD1803		32	65750	1FDEE3FS2KDC5264	7 01/15/20	\$72,635.02	na	DR	12	2	13	G	Excellent		71,028		Sec. 5339		Oper	05/25/20	5 Years		8TRO.81.001	K007233	NY-2017-024-00	Yes	CP 491
		Ford	2022	BG2914		33	9027	1FDEE3FK5NDC422		\$82,023.39	na	DR	12	2	13	G	Excellent		9,541	08/29/23		Yes	Oper	01/15/23	5 Years	2027	8TRO78/86	K007397	NY-2019-046-00	Yes	CP 482
		Ford	2022			34	9039	1FDEE3FK1NDC422		\$82,023.39	na	DR	12	2	13	G	Excellent		10,637		Sec. 5307		Oper	01/15/23	5 Years	2027	8TRO78/86	K007397	NY-2019-046-00	Yes	CP 482
		Ford	2022	BG2917	E6775	35	9042	1FDEE3FK7NDC422	78 08/12/22	\$82,023.39	na	DR	12	2	13	G	Excellent	08/12/22	4,231	08/29/23	Sec. 5307	Yes	Oper	01/15/23	5 Years	2027	8TRO78/86	K007397	NY-2019-046-00	Yes	CP 482
	+	1		+	+	+	+	-	+	_	-	_	_				+	\vdash	-	\vdash		-				-	-	K007177/	10100 00-		-
Monroe DAR	6	Ford	2018	BB8752	E0274	36	96430	1FDEE3FS4JDC082	27 01/04/10	\$71.651.04	1FDFE4FS3CDB11078	DR	12	2	13	G	Excellent	04/01/19	36.658	07/19/22	Sec. 5339/5307	Yes	Oner	04/01/19	5 Years	2024	8TRO.81.001	K0071777 K007233	NY-90-x733 / NY-2017-024-00	Yes	CP 502 / CP 49
91 Mine Road	1 "	Ford	2018	BB8751		37	96400	1FDEE3FS2JDC082			1FDFE4FSXDDA85449		12	2	13	G		04/01/19	58,516		Sec. 5339		Oper.	04/01/19	5 Years	2024	8TRO.81.001	K007233	NY-2017-024-00	Yes	CP 502 / CP 491
Monroe, NY 10950	1	Ford	2019			38	56800	1FDEE3FS3KDC065			1FDFE4FS6DDA85450		12	2	13	G		05/06/19	40,745	12/13/23		Yes	Oper.	05/06/19			8TRO.81.001	K007233	NY-2017-024-00	Yes	CP 491
l	1	Ford	2019	BB9952	E0277	39	56810	1FDEE3FSXKDC065	50 03/22/19	\$71,651.94	1FDFE4FS8DDA85451	DR	12	2	13	G	Excellent	05/06/19	38,424	08/28/23	Sec. 5339		Oper.				8TRO.81.001		NY-2017-024-00	Yes	CP 491
1	1	Ford	2019			40		1FDEE3FS1KDC065			1FDFE4FSXDDA85452		12	2	13	G		05/06/19			Sec. 5339		Oper.	05/06/19			8TRO.81.001	K007233		Yes	CP 491
		Ford	2019	BB9949	E0290	41	56930	1FDFE4FS4KDC073	16 03/22/19	\$74,445.27	1FDFE4FS1DDA85453	DR	16	2	17	G	Excellent	05/06/19	79,457	10/19/23	Sec. 5339	Yes	Oper.	05/06/19	5 Years	2024	8TRO.81.001	K007233	NY-2017-024-00	Yes	CP 491
	-		2015	AV4823	D2854	-		1FDFF4FS8FDA068		*******	1FD4E45P28DB59179		- 40		13	_			163.391	07/31/23	0 5011	Yes			5 Years	UAS	8792 21 303	C003762			CP 496
Montgomery-Crawford 110 Bracken Road	5	Ford Ford	2015			2	6183	1FDFE4FS8FDA068		\$58,630.30		DR DR	12	2	13	G	Poor	02/06/15	158,710	07/31/23	Sec. 5311	Yes	Oper. n/a	02/06/15	5 Years	UAS	8792.21.303 8TRO.80.001	K006805	n/a n/a	Yes Yes	CP 496 CP 501
Montgomery, NY 12549		Ford	2021			3	75560				1FDFE4FS8DDA85448		12	2	13	G	Excellent		40,654		Sec. 5311		Oper.	06/29/21	5 Years		8TRO79	C004131	n/a	Yes	CP 542 / CP 483
		Ford	2021	BE4912				1FDEE3FK5MDC175			1FDFE4FS8FDA06878		12	2	13	G	Excellent		29,334		Sec. 5311		Oper.	06/29/21			8TRO79	C004131	n/a	Yes	CP 542 / CP 483
		Ford	2021	BE4911	E5276	5	7892	1FDEE3FK4MDC324	04 04/19/21	\$78,915.00	1FDFE4FSXFDA06879	DR	12	2	13	G	Excellent	04/19/21	37,431	07/31/23	5307/5311	Yes	Oper.	06/29/21	5 Years	2026	8TRO78/86	K007397	NY-2019-046-00	Yes	CP 481 / CP 483
Newburgh (Tn) DAR	3	Ford		R42933							1FD4E45P88DB00900	DR	12	2	13	G		12/10/14				No	n/a	11/25/13	5 Years		n/a	n/a	NY-96-X014	Yes	CP 401
311 Route 32		Ford Ford	2018			14	96350 96390	1FDEE3FS0JDC082			1FDEE3FL9DDA89071 1FDFE4FS1DDA89079		12	2	13 13	G	Excellent	05/13/19	43,346 48,314	08/04/23	Sec. 5339	Yes	Oper	05/13/19	5 Years	2024	8TRO.81.001 8TRO.81.001	K007233 K007233	NY-2017-024-00 NY-2017-024-00	Yes	CP 491
Newburgh, NY 12550		Ford	2016	BC1501	E0286	16	96390	1FDEE3F84JDC075	15 12/1//18	\$/1,651.94	1FDFE4FS1DDA89079	DR	12		13	G	Excellent	05/1//19	48,314	09/06/23	Sec. 5339	Yes	Oper	05/17/19	5 Years	2024	81KO.81.001	K00/233	NY-2017-024-00	Yes	CP 491
Port Jervis DAR	3	Ford	2015	AV5431	D2844	110	6195	1FDFE4FS0FDA068	91 02/05/15	\$58,630,30	1FD4E45P98DB59177	DR	12	2	13	G	Poor	02/05/15	84.018	09/28/23	SDF	Yes	n/a	02/05/15	5 Years	UAS	8TRO.80.001	K006805	n/a	Yes	CP 501
1 Franklin Street	-	Ford	2021	AK3992		111	7893	1FDEE3FK6MDC333			1FDFE4FS9FDA06890		12	2	13	G		04/28/21	20,238	02/27/23		Yes	Oper.	06/25/21	5 Years	2026	8TRO79	C004131	n/a	Yes	CP 542 / CP 483
Port Jervis, NY 12771		Ford	2021	AK3993	E5278	112	7894	1FDEE3FK8MDC333	59 04/28/21	\$78,915.00	1FDFE4FS0FDA06891	DR	12	2	13	G	Excellent	04/28/21	14,293	02/22/23	Sec. 5311	Yes	Oper.	06/25/21	5 Years	2026	8TRO79	C004131	n/a	Yes	CP 542 / CP 483
Wallkill DAR	6	Ford	2018	BB8749		136					1FDFE4S2CDB09287		12	2	13	G		04/03/19		11/09/23			Oper	04/03/19					NY-2017-024-00		CP 491
99 Tower Drive Middletown, NY 10941		Ford Ford	2018			135 137	96450 51570	1FDEE3FS8JDC0823			1FDFE4S4CDB09288 1FDFE4FS8DDA89077		12	2	13	G		04/03/19	89,714 82,300	10/12/23	Sec. 5339 Sec. 5339		Oper	04/03/19	5 Years 5 Years		8TRO.81.001 8TRO.81.001	K007233 K007233	NY-2017-024-00 NY-2017-024-00	Yes Yes	CP 491
Middletown, NY 10941		Ford	2019			138		1FDFE4FS0KDC073		\$74,651.94	NA NA	DR	16	2	17	G				11/1//23		Yes	Oper	05/04/19	5 Years		8TRO.81.001	K007233	NY-2017-024-00	Yes	CP 491
		Ford	2022	BF9815	E6776	139	9043	1FDEE3FK9NDC422	79 08/19/22	\$82,023,39	1FDFE4FS0GDC13119	DR	12	2	13	G	Excellent	08/19/22	14,973	09/11/23		Yes	Oper	10/26/22	5 Years	2027	8TRO78/86	K007397	NY-2019-046-00	Yes	CP 482
		Ford	2022	BF9811	E6779	140	7293	1FDFE4FN3NDC430	58 08/19/22	\$85,384.23	1FDFE4FS7GDC33173	DR	16	2	17	G	Excellent	08/19/22	14,824	09/11/23		Yes	Oper	10/26/22	5 Years	2027	8TRO78/86	K007397	NY-2019-046-00	Yes	CP 482
Warwick DAR	10	Ford	2016					1FDFE4FS5GDC107		\$67,013.13		DR	16	2	17	G	Good	03/15/18		07/18/23	SDF	Yes	n/a	01/26/16	5 Years	UAS	8TRO.80.001	K006805	n/a	Yes	CP 501
132 Kings Highway Warwick, NY 10990	1	Ford	2016	AX6824 BB8746		SUV	51580	1FM5K8D87GGB977 1FDEE3FS3JDC296		\$31,933.04 \$71.651.94		DR DR	12	2	13	G	Good	03/16/18		07/28/23 12/05/23	SDF Sec. 5339	Yes	n/a	03/31/16	8 Years		8TRO.80.001 8TRO.81.001	K006805	n/a NY-2017-024-00	Yes	CP 501 CP 502 / CP 491
Walmick, WT 10990	1	Ford Ford	2018	BB8745		133	51580	1FDEE3FS3JDC296			1FDFE4FS1DDA79098		12	2	13	G	Excellent	04/01/19	80,601 81.618		Sec. 5339 Sec. 5339	Yes Yes	Oper. Oper.	04/01/19 04/01/19	5 Years 5 Years		8TRO.81.001	K007233 K007233	NY-2017-024-00 NY-2017-024-00	Yes Yes	CP 502 / CP 491
1	1	Ford	2018			131	51610	1FDEE3FS6JDC310			1FDFE4FS4DDA79100		12	2	13	G	Excellent		72,320	08/15/23		Yes	Oper.	04/01/19	5 Years	2024	8TRO.81.001	K007233	NY-2017-024-00	Yes	CP 502 / CP 491
		Ford	2019	BB9946	E0289	134	56900	1FDFE4FS9KDC073	13 03/22/19	\$74,445.27	1FDFE4FS6DDA79101	DR	16	2	17	G	Excellent	05/03/19	40,430	08/17/23	Sec. 5339	Yes	Oper.	05/03/19	5 Years	2024	8TRO.81.001	K007233	NY-2017-024-00	Yes	CP 491
1	1	Ford	2021	BE4551		135	7573	1FDEE3FK1MDC175			1FDFE4FS2FDA06892		12	2	13	G	Excellent		50,271		Sec. 5307	Yes	Oper.	06/14/21	5 Years	2026	8TRO78	K007233	NY-2017-024-00	Yes	CP 491
1	1	Ford	2021	BE4549		136	7574	1FDEE3FK3MDC175			1FDFE4FS4FDA06893		12	2	13	G		04/19/21	35,290		Sec. 5307	Yes	Oper.	06/14/21	5 Years		8TRO78	K007233	NY-2017-024-00	Yes	CP 491
1	1	Ford		BE4550							1FDFE4FS6FDA06894		12	2	13	G		04/19/21		09/14/23		Yes	Oper.		5 Years		8TRO78		NY-2017-024-00	Yes	CP 491
l	1	Ford	2022	BF9816	E6780	138	/292	1FDFE4FN1NDC430	57 08/19/22	\$65,384.23	1FDFE4FS5GDC10779	DR	16	2	17	G	Excellent	08/19/22	9,579	12/04/23	sec. 5307	Yes	Oper.	10/26/22	5 Years	2027	8TRO78/86	K007397	NY-2019-046-00	Yes	CP 482
ADA (MTM Transit)	11	Ford	2015	24524LV	D2851	163	6191	1FDFE4FS9FDA068	87 01/29/15	\$59,783.52	n/a	DR	10	3	11	G	Spare	01/29/15	95.337	12/31/23	SDF	Yes	n/a	01/29/15	5 Years	UAS	8TRO.80.001	K006805	n/a	Yes	CP 501
169 Mill Street	1 "	Ford	2015			165	6192	1FDFE4FS0FDA068		\$59,783.52	n/a	DR	10	3	11	G	Spare	01/29/15		12/31/23	SDF	Yes	n/a	01/26/15	5 Years		8TRO.80.001		n/a	Yes	CP 501
Newburgh, NY 12550	1	Ford	2017		D5377	169		1FDEE3FS6HDC190	28 03/09/17	\$68,769.00	n/a	DR	10	3	11	G	Excellent	03/09/17	81,180	12/31/23	SDF	Yes	n/a	03/09/17	5 Years			K006805	n/a	Yes	CP 501, 502 & 54
l	1	Ford	2017			167		1FDEE3FS6HDC190		\$68,769.00	n/a	DR	10	3	11	G	Excellent	03/09/17			Sec. 5307	Yes	n/a	03/09/17	5 Years		8TRO.80.001	K006959	n/a	Yes	CP 501, 502 & 54
l	1	Ford	2021	14965LY		170	7564	1FDEE3FK0MDC175			1FDFE4FSXFDA06882		12	2	13	G	Excellent				Sec. 5307		n/a	06/07/21				K007397	NY-2019-046-00	Yes	CP 542
1	1	Ford	2021	14964LY		171	7565	1FDEE3FK2MDC175			1FDFE4FS1FDA06883		12	2	13	G	Excellent		47,737		Sec. 5307	Yes	n/a	06/07/21	5 Years	2026	8TRO78/86	K007397	NY-2019-046-00	Yes	CP 542
	1	Ford Ford	2021			172	7566 7567				1FDFE4FS3FDA06884 1FDFE4FS5FDA06885		12	2	13	G G	Excellent	04/09/21	41,593 16,373	12/31/23	Sec. 5307	Yes Yes	n/a	06/07/21	5 Years 5 Years		8TRO78/86 8TRO78/86	K007397	NY-2019-046-00 NY-2019-046-00	Yes Yes	CP 542 CP 542
	1	Ford	2021	14962LY	E4522	173	7568	1FDEE3FK0MDC175			1FDFE4FS7FDA06886	DR	12	2	13	G	Excellent	04/09/21	43,428	12/31/23		Yes	n/a n/a	06/07/21	5 Years	2026	8TRO78/86	K007397 K007397	NY-2019-046-00 NY-2019-046-00	Yes	CP 542
	1	Ford		14960LY		175					1FDFE4FS9FDA06887		12	2	13	G		04/09/21	40,491	12/31/23		Yes	n/a	06/07/21	5 Years			K007397	NY-2019-046-00	Yes	CP 542
		Ford		14959LY		176					1FDFE4FS0FDA06888		12	2	13	G		04/19/21		12/31/23		Yes	n/a	06/07/21	5 Years		8TRO78/86		NY-2019-046-00	Yes	CP 542
Footnotes	56													DR = Dema	and-Respons	ive, FR = Fi	ixed-Route, D	FR = Deviate	ed Fixed-Rou	ute		OOS = Out	of Service								
									D = Diesel												PR/UAS = P	reviously Ret	tired/Used A	s Spare							1
l									G = Gas					SDF = State	e Dedicated I	Funds															1