

Sponsored by: City Manager

RESOLUTION NO. 22-9987

A RESOLUTION OF THE CITY COMMISSION OF THE CITY OF OPA-LOCKA, FLORIDA, ACCEPTING THE REVISED OPA-LOCKA TITLE VI PROGRAM PLAN; AUTHORIZING THE CITY MANAGER TO TAKE ALL NECESSARY ACTION; PROVIDING FOR INCORPORATION OF RECITALS; PROVIDING FOR AN EFFECTIVE DATE.

WHEREAS; on July 14, 2015, pursuant to Resolution No. 15-9048, the City Commission of the City of Opa-Locka voted to authorize the City Manager to accept and implement the Miami-Dade County Transit Opa-Locka Transit Policy for the City of Opa-Locka ("City"), as required by the FDOT for Recipients of State and Federal Funding Dollars; and

WHEREAS; the Opa-Locka Title VI Program ensures that no person is excluded or denied the benefit of service based on race, color, or national origin. The contents of the revised plan has been prepared in accordance with the Section of Title VI of the Civil Rights Act of 1964; and

WHEREAS; the City has received funding from Miami Dade County through the Citizens' Independent Transportation Trust (CITT) Program to fund the Opa-Locka Shuttle Bus for the North Route and was recently awarded funding from the Florida Department of Transportation (FDOT) for the Opa-Locka South Route that will soon be in service. Both funding agencies require municipalities to keep an active Title VI Program, to update the program every three years, and requires the approval of the City Commission; and

WHEREAS, the City Commission finds that it is in the best interest of the City and its residents to authorize the City Manager to accept and implement the revised Opa-Locka Title VI Program Plan, attached hereto as Exhibit "A", to comply with the Federal Transit Administration (FTA) requirements and benefit from the use of funds to innovate or improve existing public services, such as the Opa-Locka Shuttle Bus service that is being offered to the community for free.

NOW THEREFORE, BE IT RESOLVED THAT THE CITY COMMISSION OF THE CITY OF OPA LOCKA, FLORIDA:

Section 1. Recitals. The recitals to the preamble herein are incorporated by reference.

Section 2. Directing Interim City Manager. The City Commission hereby authorizes Interim City Manager, Darvin Williams, to accept and implement the revised Opa-Locka Title VI Program Plan, attached hereto as Exhibit "A" and execute the Office of Civil Rights Municipality Information Sheet Title VI Program Yearly Update Form, attached hereto as Exhibit "B".

Section 3. Scrivener's Errors. Sections of this Resolution may be renumbered or re-lettered and corrections of typographical errors which do not affect the intent may be authorized by the City Manager, following review by the City Attorney, without the need for public hearing, by filing a corrected copy of same with the City Clerk.

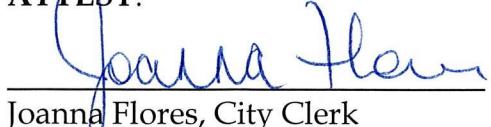
Section 4. Effective Date. This Resolution shall be effective immediately.

PASSED AND ADOPTED this 8th day of June, 2022.



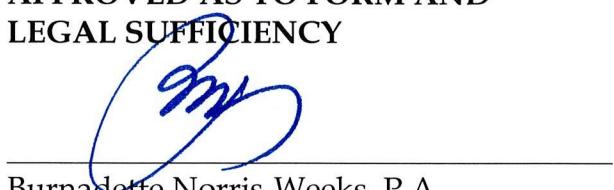
Veronica Williams, Mayor

ATTEST:



Joanna Flores, City Clerk

**APPROVED AS TO FORM AND
LEGAL SUFFICIENCY**



Burnadette Norris-Weeks, P.A.
City Attorney

Moved by: Commissioner Taylor

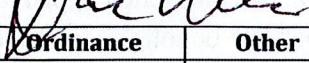
Seconded by: Commissioner Davis

VOTE: 4-0

Commissioner Bass:	YES
Commissioner Davis:	YES
Commissioner Dominguez:	ABSENT
Vice-Mayor Taylor:	YES
Mayor Williams:	YES



**City of Opa-locka
Agenda Cover Memo**

Department Director:	Airia Austin		Department Director Signature:				
City Manager:	Darvin Williams		CM Signature:				
Commission Meeting Date: <i>(Enter X in box)</i>	06/08/2022		Item Type:	Resolution	Ordinance	Other	
				X			
Fiscal Impact: <i>(Enter X in box)</i>	Yes	No	Ordinance Reading: <i>(Enter X in box)</i>	1st Reading		2nd Reading	
	X		Public Hearing: <i>(Enter X in box)</i>	Yes	No	Yes	No
Funding Source: <i>(Enter Fund & Dept.)</i> Ex: See Financial Impact Section			Advertising Requirement: <i>(Enter X in box)</i>	Yes		No	
						X	
Contract/P.O. Required: <i>(Enter X in box)</i>	Yes	No	RFP/RFQ/Bid#:				
	X						
Strategic Plan Related <i>(Enter X in box)</i>	Yes	No	Strategic Plan Priority Area: Enhance Organizational <input type="checkbox"/> Bus. & Economic Dev <input checked="" type="checkbox"/> Public Safety <input type="checkbox"/> Quality of Education <input type="checkbox"/> Qual. of Life & City Image <input checked="" type="checkbox"/> Communication <input type="checkbox"/>	Strategic Plan Obj./Strategy: <i>(list the specific objective/strategy this item will address)</i>			
	X						
Sponsor Name	City Manager		Department:	City Manager			

Short Title:

**OPA-LOCKA TRANSIT SYSTEM
TITLE VI PROGRAM PLAN**

Staff Summary:

A resolution from the City Commission of the City of Opa-locka, Florida to authorize the City Manager to accept and implement the revised Opa-locka Title VI Program Plan to comply with the Federal Transit Administration (FTA) requirements and benefitting from the use of funds to innovate or improve existing public services such as the Opa-locka Shuttle Bus service that is being offered to the community for free.

The program ensures that no person is excluded or denied benefitting from the service based on race, color, or national origin. The contents of the program have been prepared in accordance with the Section of Title VI of the Civil Rights Act of 1964.

The City currently received funding from Miami Dade County through the Citizens' Independent Transportation Trust (CITT) Program to fund the Opa-locka Shuttle Bus for the North Route and was recently awarded funding from the Florida Department of Transportation (FDOT) for the Opa-locka South Route that will be in service soon. Both funding agencies require municipalities to keep an active Title VI Program, to update the program every three years, and requires the approval of the City Commission.

Proposed Action:

Staff recommends approval of this item to continue benefitting from available funding opportunities that are beneficial to our community, to comply with federal, state, and county requirements, and most importantly to ensure that no person be discriminated based on race, color or national origin in all services provided by the City.

Attachment:

1. Agenda
2. Opa-locka Title VI Program
3. Miami Dade County (MDC) Title VI Municipality Update Form
4. Opa-locka 's Resolution No. 15-9048 for Opa-locka Transit Policy



OPA-LOCKA TRANSIT SYSTEM

(OTS)

TITLE VI PROGRAM PLAN

Contents

1. INTRODUCTION.....	1
1.1. OTS' COMMITMENT TO CIVIL RIGHTS.....	1
2. GENERAL REQUIREMENTS.....	1
2.1. NOTICE TO THE PUBLIC.....	1
3. DISCRIMINATION COMPLAINT PROCEDURES	2
4. OTS PUBLIC PARTICIPATION PLAN	5
4.1. KEY PRINCIPLES	5
4.2. OTS' PUBLIC PARTICIPATION PROCESS	5
5. LANGUAGE ASSISTANCE PLAN.....	6
5.1. FACTOR 1 – NUMBER OF LEP PERSONS ON SERVICE REGION.....	7
5.2. FACTOR 2 – FREQUENCY OF LEP USE	7
5.3. FACTOR 3 – THE IMPORTANCE OF OTS SERVICE TO PEOPLE'S LIVES	7
5.4. FACTOR 4 – RESOURCES AND COSTS FOR LEP OUTREACH	8
6. DECISION MAKING BODIES	8
7. SERVICE STANDARDS AND POLICIES.....	8
EXHIBIT - 1	10
APPENDIX - A.....	11
APPENDIX - B.....	14
APPENDIX - C.....	15
APPENDIX - D.....	16
APPENDIX – E	18

1. INTRODUCTION

1.1. OTS' COMMITMENT TO CIVIL RIGHTS

This update of Opa-locka Transit System's Title VI Program has been prepared to ensure that the level and quality of OTS' fixed route services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to OTS' riders and residents alike. Additionally, through this program, OTS has examined the need for services and materials for persons for whom English is not their primary language, and who have a limited ability to read, write, speak, or understand the English language.

While it is a matter of principle that OTS is committed to ensuring that no person is excluded from participation in or denied the benefits of subject to discrimination in the receipt of any of OTS' services based on race, color or national origin, the contents of this program have been prepared in accordance with the Section of Title VI of the Civil Rights Act of 1964.

"Federal agencies are to examine the services they provide, identify any need for services to those with limited English proficiency, and develop and implement a system to provide those services so LEP persons can have meaningful access to them"

Executive Order 13166

Under the Civil Rights Act of 1964, and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) of the U.S. Department of Transportation (US DOT), the Highway Transportation System (HTS) has an obligation to ensure that,

- The benefits of its bus services are shared equitably throughout the service area.
- The level and quality of bus services are sufficient to provide equal access to all riders in its service area.
- No one is precluded from participating in OTS service planning and development process.
- Decisions regarding service changes are made without regard to race, color or national origin and that development benefitting a community as a whole not be unjustifiably done through the disproportionate allocation of its adverse environmental and health burdens on the community's minority population.

2. GENERAL REQUIREMENTS

2.1. NOTICE TO THE PUBLIC

To make OTS' riders aware of its commitment to Title VI compliance, and of their right to file a civil right compliant, OTS has presented the following language, in both English and Spanish, on decals inside the buses and on its website, WWW.OPALOCKAFL.GOV

2.2. YOUR CIVIL RIGHTS



OTS operates The Opa-locka Express service without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes they have been aggrieved by any unlawful discriminatory practice under the Title VI may file a complaint with OTS. For more information on OTS' civil rights program and procedures to file a complaint, please contact transit office by email to OCarney@opalockafl.gov or call the office at 305-953-2868 and advised them that you need assistance in obtaining more information on filling out a TITLE VI Complaint form.

3. DISCRIMINATION COMPLAINT PROCEDURES

OTS has established a process for riders to file a complaint under Title VI. Any person who believes that she or he has been discriminated against based on race, color, or national origin by OTS may file a Title VI complaint by completing and submitting the agency's Title VI Complaint form (appendix A) available on our website WWW.OPALOCKAFL.GOV. Download the form, fill it out completely and print it. Mail the completed form to:

Opa-locka Transit System
Title VI Complaint – ocarney@opalockafl.gov
12950 NW 42nd Ave. Opa-locka. FL 33054

Note: The City of Opa-locka encourages all complainants to send the complaint forms via certified mail through the US Postal Service, to ensure that all written correspondence can be easily tracked.

The Complaint Procedure

The following procedures apply to complaints filed under Title VI of the Civil Rights Act of 1964, relating to any program and/or activity administered by OTS, and/or contractors. Intimidation or retaliation of any kind is prohibited by law.

These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies, or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant.

OTS investigates complaints received no more than 30 days after the alleged incident. OTS will process complaints that are complete. Once the complaint is received, OTS will review it and the complainant will receive an acknowledgement letter (appendix B) informing them whether the complaint will be investigated by OTS. OTS will then notify the Miami-Dade Transit (MDT) Office of Civil Rights and Labor Relations Allison Aristide – Title: VI/Non-Discrimination Coordinator. Allison@miamidade.gov (305.468.5900)

Every effort will be made to obtain early resolution of complaints at the lowest possible level. OTS has up to 60 days to investigate the complaint. If more information is needed to resolve the case, OTS may contact the complainant. The complainant has fifteen days from the date of the letter to send requested information back to OTS. If the information is not received back from the complainant within the fifteen days, OTS can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the complaint is investigated and reviewed, one of two letters will be issued to the complainant, a closure letter (appendix C) or a letter of finding (LOF) (appendix D). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.

A LOF summarizes the allegations and the interviews regarding the alleged incident and explains whether any disciplinary action, additional training of the staff member or other action will occur.

If the complainant wishes to appeal the decision, she or he has ten days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at:

Federal Transit Administration Office of Civil Rights
Attention : Complaint Team
East Building, 5th Floor - TCR
1200 New Jersey Avenue SE
Washington, DC 20590

Title VI Complaint Form



Active Complaints or Inquiries alleging Discrimination

HTS maintains a list of all complaints alleging discrimination. This list is maintained and stored electronically. As of July 1, 2014, there are no Title VI complaints.

List of TITLE VI Investigations, Lawsuits and Complaints

Type (Investigation, Lawsuit or Complaint)	Date of Complaint (Month/Day/Year)	Summary of Complaint (Include basis of Complaint; race, color or national origin)	Status of Complaint	Action (s) Taken

4. OTS PUBLIC PARTICIPATION PLAN

4.1. KEY PRINCIPLES

Public Participation Plan (PPP) process is in place. Any changes that greatly affect the users will need City Council approval. The time and date of these meetings are posted at City Hall in the lobby and are also posted online in the city's webpage (www.opalockafl.gov). The residents may review the agenda and participate in the meeting. The postings usually occur 4 days prior to the meeting. Also, any changes that affect will also be posted on the inside of the buses in English and Spanish.

Potentially affected community members will have the appropriate opportunity to express any concerns that they may have regarding the issue at hand.

The concerns of the participants involved will be considered in the decision-making process.

Through an open public process, OTS follows a public participation plan to provide for public involvement efforts and enhance access to OTS transportation decision-making process by minority and Limited English Proficient (LEP) populations.

Limited English Proficient (LEP)

LEP refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

OTS will use its Public Participation Plan when considering fare changes, modifications to routes and schedules when,

- Fare increases or significant changes in the method of fare payment are being considered.
- A new route is established.
- An existing route is proposed for elimination.
- Considering the total discontinuance of service on any line or group of lines on any given day when service is currently offered.
- Any system-wide change in service hours that exceeds 10% of current total service hours.
- Routing on any given route or routes that affect more than 25% of the riders using the affected route(s).

4.2. OTS' PUBLIC PARTICIPATION PROCESS

Outreach Efforts - Alerting Riders

OTS' PPP maintains the traditional elements to the outreach program such as seat-drop flyers, driver issued surveys, and by posters and notices on the buses. While there may be minor variations in the outreach process from time-to-time. The outline below provides the general steps for engaging riders in the decision-making process using a fare change as an example.

1. A fare change proposal is developed internally or because of public comment.
2. If required, approval from the City Council is sought to proceed to a public comment hearing.
3. Public meetings (City Council) are posted at City Hall in the lobby board and posted online in the city's webpage (www.opalockafl.gov) usually 4 days prior.
4. Bilingual (English & Spanish) public outreach is available.

Example of fare increase notice placed inside bus,

The City of Opa-locka will not increase any transit rate

There has never been a transit assessment in the City of Opa-locka other than the Miami Dade Transit Bus

In response to recent changes made by the Federal Transit Administration (FTA) on Title VI Requirements and Guidelines for FTA Recipients (FTA C4702.1B). The City of Opa-locka is looking for residents to provide input on a pending fare increase and its impact on fixed route on fixed route services. The public can submit comments on the fare increase through June 30, 2022, by emailing the City of Opa-locka at Ocarney@opalockafl.gov. Comments can also be submitted in writing to: Opa-locka Transit System at 12950 NW 42nd Avenue. Opa-locka, FL 33054

La ciudad de Opa-locka nunca ha implementado ninguna tarifa ni aumento de la misma.

Este incremento de tarifa ha sido la tercera en los últimos once años.

En respuesta a los cambios recientes realizados por la FTA a los Requisitos y Guías para beneficiarios del Title VI (FTA C4702.1B), la Ciudad de Opa-locka está buscando comentarios de los usuarios de autobuses a cerca del incremento pendiente en las tarifas de autobuses. Los comentarios serán aceptados hasta el día 30 de June 2022 por correo electrónico a: ocarney@opalockafl.gov o por correo a Opa-locka Transit System al 12950 NW 42nd Avenue. Opa-locka, FL 33054

5. LANGUAGE ASSITANCE PLAN

Improving Access for People with Limited English Proficiency

To ensure meaningful access to programs and activities. OTS uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps OTS to determine if it communicates effectively with LEP persons and in forms language access planning.

The Four Factor Analysis is a local assessment that considers,

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by OTS.
2. The frequency with which LEP persons come into contact with OTS services.
3. The nature and importance of OTS' services in people's lives; and
4. The resources available to OTS for LEP outreach, as well as cost associated with that outreach.

5.1. FACTOR 1 – NUMBER OF LEP PERSONS ON SERVICE REGION

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of LEP persons who may encounter OTS service, their literacy skills in English and their native language, the location of their community and neighborhoods and, more importantly, if any are underserved as a result of a language barrier.

City of Opa-locka Overview

Our transportation efforts, although not enough, currently serve the city. Opa-locka is located 10 miles north of downtown Miami, in Miami-Dade County, Florida, is 4.265 square miles and is home to 16,463 residents representing a highly vulnerable population. The target community consists of individuals and families with small children living below the poverty line, elderly in poverty, a population that is predominantly minority, with high levels of unemployment, under-educated, living in substandard housing within substandard community infrastructures, battered by seasonal storms and devastated by declared disasters, living with the daily consequences of the high crime rate, who are blighted by environmental justice concern due to their disproportionate risk of health issues stemming from exposure to contaminants from the proximity of their neighborhoods to Brownfield.

The target population needs greater opportunities for educational advancement. Approximately 21.30% of the population have not completed high school. Health disparities are often linked to school performance with a direct correlation between school attendance levels and academic success. People who do not have high school diploma or higher-level education is more propense to live in poverty or end up unemployed.

Approximately ten public schools are either located in or assigned to Opa-locka area with an attendance of over 2,700 children from pre-kindergarten to twelve grade level, who travel to and from school each day. Ninety percent (90%) of these children are eligible for free or reduced lunch which reaffirm the fact that high level of Opa-locka's population live with low income. All these schools enroll 100% minority (Black and Hispanic). Test scores in these schools falls far below the state average. (www.greatschools.org)

5.2. FACTOR 2 – FREQUENCY OF LEP USE

There are places where OTS riders of the LEP population can come into contact with OTS service such as fixed route buses and informational calls to customer service. It is important for OTS to ensure that the following points of contact are covered in English and Spanish,

- The use of the bus service.
- Communication with OTS customer service staff.
- Bus pass sales
- Printed outreach materials - ex, Brochures
- Web-based materials
- Meetings - City Council meetings
- Service-related posters - notices inside buses

5.3. FACTOR 3 – THE IMPORTANCE OF OTS SERVICE TO PEOPLE'S LIVES

Access to the services provided by OTS' fixed route is critical to the many people in the area. Many depend on OTS' fixed route services for access to jobs and for access to essential community services, shopping places, and medical appointments. Riders eligible for service under the American's with

Disabilities Act (ADA) require service for the same reasons. Because of the essential nature of these services and the importance of these to the many residents in the area, there is a need to ensure that language is not a barrier to access.

Based on passenger surveys, many of the riders responded to using the buses for multiple reasons. The percentages given below is based on just the number of each individual reason for using the bus by the total number of respondents.

- 96 (%) reported depending on the service for work related transportation.
- 41(%) reported using the service for school.
- 75(%) reported using the service for health care.
- 58(%) reported using the service for shopping - all essential trip purposes.

5.4. FACTOR 4 – RESOURCES AND COSTS FOR LEP OUTREACH

OTS is committed to providing resources to improve access to its services for LEP persons. Today, bilingual information (English/Spanish) is distributed in several different manners including,

- The inside of the Shuttles
- On each pickup point of route
- Will be posted on our web site in English and Spanish
- Brochures are placed in the City Hall Main Entrance

6. DECISION MAKING BODIES

Non- Elected Committees and Councils

The City of Opa-locka does not have a non-elected committee and /or council or any advisory board regarding this policy of services.

7. SERVICE STANDARDS AND POLICIES

Vehicle Capacity

Vehicle Headway (Frequency)

The shuttle buses operate on weekdays. and Saturdays between hours of 6am and 7pm except holiday(s) within the city and connect residents to the Tri Rail station as well as to MDT bus stops. The shuttle services allow residents to connect to areas of work and school outside of the city. It helps local and regional mobility significantly.

Our City Commission advised us for the north route extension along NW 151st Street from NW 27th Avenue to NW 37th Avenue. Currently NW 151st Street has shuttle bus services for the commercial area from NW 22nd Avenue to NW 27th Avenue but no services for the residential areas between NW 27th Avenue and NW 37th Avenue. The southbound shuttle bus on NW 27th Avenue makes left on NW 151st Street goes towards NW 22nd Avenue.

Request was made to extend the North bound shuttle bus can make right turn on NW 151st Street and extend services between NW 27th Avenue and NW 37th Avenue by routing through NW 37th Avenue. Sultan Avenue. Curtis Drive and then back to NW 151st Street towards 22nd Avenue as shown on the attached Exhibit - 1. This will require about 10 minutes travel time adjustment and will not require any additional bus if this time can be adjusted on the schedule. The schedule for the route on the east

side of NW 22nd Avenue can be adjusted as it serves only the commercial area. The proposed route extension will help the residential community between NW 27 Avenue and NW 37th Avenue. NW 151 Street is the city limit, and the route extension will provide services to the Miami Gardens resident on the north side and Opa-locka residents on the south side. It will enhance the shuttle services popularity and will increase the total ridership.

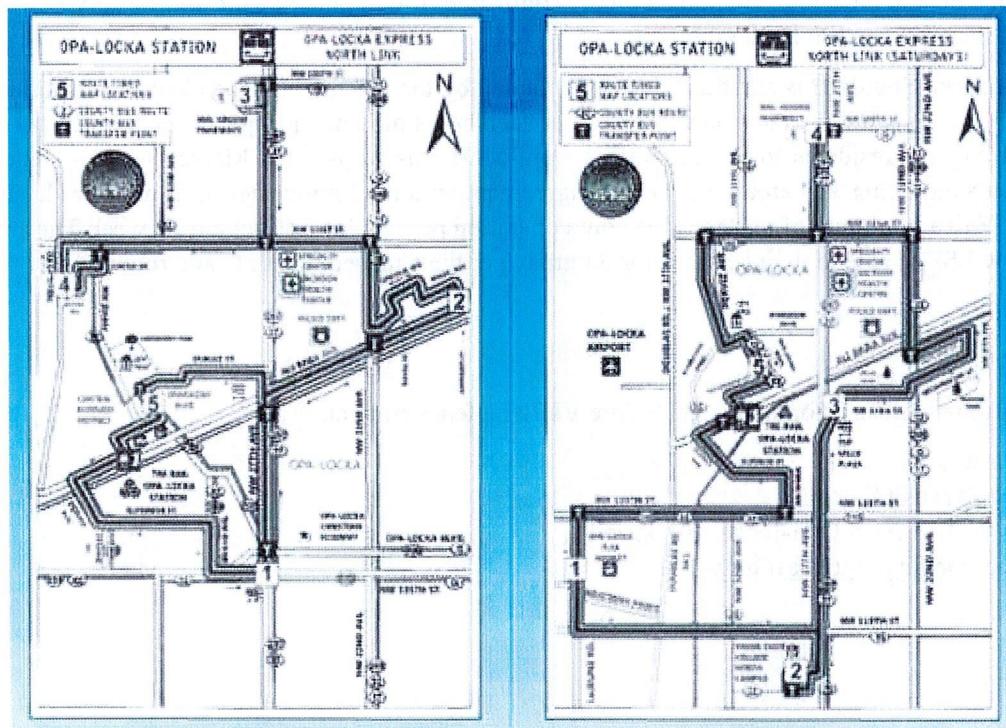
The Opa-locka Shuttle Bus shuttle is currently funded by the Citizens Independents Transportation Trust (CITT) Program and it operates on weekdays between hours of 6am and 7pm except holiday(s) within the city and connect residents to the Tri Rail station. MDT bus stops. Flea Market. Miami- Dade College, Walgreen's and other key areas. The current agreement with the Limousines of South Florida (LSF) does allow LSF to a minimum of thirteen (13) hours operation per day for 5 (five) days a week The amendment will allow LSF to extend their services for Saturday per the attached schedule and route map.

CONTACT

For additional information on the OTS Title VI Plan please contact.

Owen Carney
Opa-locka Transit System
12950 NW 42nd Ave. Opa-locka. FL 33054
Email: ocarney@opalockafl.gov

EXHIBIT - 1



Opa-locka Station Opa-locka Express North Link Shuttle Bus Schedule

WEEKDAY AM & PM												
North Point Arrives	South Train Arrives	Bus Departs to Rail	Opa-locka Blvd. / NW 21st Ave.	Albion Avenue / Johnson St.	Stopovers	Gutierrez Ave. / Douglas Blvd.	Albion Avenue / Johnson St.	Downstreet Opa-locka	Bus Arrives to Rail	North Point Departs	South Train Departs	
6:00	6:00	6:00	1	2	3	4	5	6	6:00	6:00	6:00	
6:15	6:15	6:00	6:00	6:40	6:45	6:50	6:55	7:00	6:55	7:15	7:15	
6:30	6:30	6:30	6:30	7:15	7:25	7:30	7:35	7:40	7:35	7:45	7:45	
7:00	7:00	7:00	7:00	7:45	8:10	8:15	8:20	8:25	8:15	8:30	8:30	
7:25/8:20	7:25/8:20	7:25/8:20	7:25/8:20	8:55	9:15	9:20	9:25	9:30	9:20	9:35	9:35	
8:30	8:30	8:30	8:30	9:55	10:25	10:30	10:35	10:40	10:30	10:45	10:45	
10:30	10:30	10:30	10:30	12:00	12:30	12:35	12:40	12:45	12:00	12:30	12:30	
11:30	11:30	11:30	11:30	12:00	12:30	12:35	12:40	12:45	12:30	12:30	12:30	
12:30	12:30	12:30	12:30	12:30	12:30	12:35	12:40	12:45	12:30	12:30	12:30	
1:30	1:30	1:30	1:30	1:30	1:30	1:35	1:40	1:45	1:30	1:30	1:30	
2:30	2:30	2:30	2:30	2:40	2:45	2:50	2:55	3:00	2:40	2:50	2:50	
3:30	3:30	3:30	3:30	3:40	3:45	3:50	3:55	4:00	3:40	3:50	3:50	
4:30/5:15	4:30/5:15	4:30/5:15	4:30/5:15	4:45	5:00	5:05	5:10	5:15	4:45	5:15	5:15	
5:45/6:30	5:45/6:30	5:45/6:30	5:45/6:30	6:00	6:15	6:20	6:25	6:30	6:00	6:30	6:30	
6:30/7:15	6:30/7:15	6:30/7:15	6:30/7:15	7:15	7:20	7:25	7:30	7:35	7:15	7:30	7:30	

SATURDAY AM & PM												
North Train Arrives	South Train Arrives	Bus Departs to Rail	Bus Arrives to Rail	Micro Stop College	Stop Value Point	Stopovers	Downstreet Opa-locka	Bus Arrives to Rail	North Train Departs	South Train Departs		
6:30	6:30	6:30	6:30	1	2	3	4	5	6:30	6:30	6:30	
6:45	6:45	6:45	6:45	6:45	6:45	6:45	6:45	6:45	6:45	6:45	6:45	
7:00	7:00	6:50	6:50	6:50	6:50	6:50	6:50	6:50	6:50	6:50	6:50	
7:15	7:15	7:00	7:00	7:00	7:00	7:00	7:00	7:00	7:00	7:00	7:00	
7:30	7:30	7:15	7:15	7:15	7:15	7:15	7:15	7:15	7:15	7:15	7:15	
7:45	7:45	7:30	7:30	7:30	7:30	7:30	7:30	7:30	7:30	7:30	7:30	
8:00	8:00	7:45	7:45	7:45	7:45	7:45	7:45	7:45	7:45	7:45	7:45	
8:15	8:15	8:00	8:00	8:00	8:00	8:00	8:00	8:00	8:00	8:00	8:00	
8:30	8:30	8:15	8:15	8:15	8:15	8:15	8:15	8:15	8:15	8:15	8:15	
8:45	8:45	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	8:30	
9:00	9:00	8:45	8:45	8:45	8:45	8:45	8:45	8:45	8:45	8:45	8:45	

For more information, call 1-800-HI-RAIL (874-7245) or visit www.hi-rail.com
Community Shuttles will operate on a "Wait & Ride" at any county bus stop or at any point in a residential area along the route.

* No rail service

APPENDIX - A

Complaint Form



Opa-locka Transit System
Title VI Non-Discrimination Program
Complaint of Discrimination

Complainant (s) Name, <i>Nombre(s) de(los) Reclamante(s),</i>	Complainant (s) Address, <i>Dirección de(los) Reclamante(s),</i>
Complainant (s) Phone Number, <i>Número de teléfono de(los) Reclamante (s),</i>	
Complainant's Representative's Name. Address. Phone Number and Relationship (e.g., friend, attorney, parent, etc). <i>Nombre del representante del Reclamante. dirección, teléfono y relación (por ejemplo, amigo, abogado, padres, etc.);</i>	
Name and Address of Agency, Institution, or Department Whom You Allege Discriminated Against You. <i>Nombre y Dirección de la agencia, institución o departamento que usted alega discriminó en su contra;</i>	

Names of the individual(s) Whom You Allege Discriminated Against You (if known);

Nombre(s) de(los) individuo(s) que usted alega discriminaron en su contra (si lo sabe);

I believe the discrimination I experienced was based on, (Check all that apply), <i>Creo que la discriminación que yo experimente fue basado en (marque todos los que apliquen),</i>	<input type="radio"/> Race <i>Raza</i> <input type="radio"/> Color <i>Color</i> <input type="radio"/> National Origin <i>Origen de Nacionalidad</i>	Date of Alleged Discrimination, <i>Fecha de la Supuesta discriminación,</i>
--	---	---

Mail to/Enviar por correo a:

Attn: Owen Carney
Opa-locka Transit System
Public Works Department
12950 NW 42nd Avenue
Opa-locka, FL 33054

The form can also be sent via email to Ocarney@opalocokall.gov

Este formulario también se puede enviar por correo electrónico a ocarney@opalockafl.gov

A complaint must be filed no later than thirty (30) days after the date of the alleged discrimination.

La queja deberá ser reportada dentro de los treinta (30) días siguientes al incidente de alegada discriminación.



OPA-LOCKA TRANSIT SYSTEM
TITLE VI NON-DISCRIMINATION PROGRAM
COMPLAINT OF DISCRIMINATION

Please provide name(s) and phone number(s) of any person, if known, that Opa-locka Transit System could contact for additional information to support or clarify your allegation(s).

Por favor provea el(los) nombre(s) y teléfono(s) de cualquier persona, si conoce, que el Sistema de Transporte de Opa-locka podría contactar para obtener información adicional que corrobore sus alegaciones.

Please explain as clearly as possible: how, why, when, and where you believe you were discriminated against. Include as much background information as possible about the alleged acts of discrimination. Additional pages may be attached if needed.

Por favor explique lo más claramente posible: cómo, por qué, cuándo y dónde cree usted que fue discriminado. Incluya la mayor cantidad de información de segundo plano posible a cerca de los supuestos actos de discriminación. Puede agregar páginas adicionales si es necesario.

Complainant(s) or Complainant(s) Representatives Signature,
Firma de(los) Reclamante(s) o de los representantes de (los) Reclamante(s),

Date of Signature,
Fecha de la Firma,

APPENDIX - B



LETTER ACKNOWLEDGING RECEIPT OF COMPLAINT

Date _____

Complainant's Name: _____

Complainant's Address: _____

Dear (Mr./Ms.),

This letter is to acknowledge that a complaint has been received from you alleging,

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please contact me at 305-953-2868.

Attn: **Owen Carney, Coordinator**
Opa-locka Transit System
Public Works Department
12950 NW 42nd Avenue
Opa-locka, FL 33054

APPENDIX - C

LETTER NOTIFYING COMPLAINANT THAT THE COMPLAINT IS SUBSTANTIATED



Date _____

Complainant's Name _____

Complainant's Address _____

Dear (Mr. /Ms.),

The matter referenced in your letter dated _____ against the Opa-locka Transit System alleging of a Title VI violation has been investigated.

The violation of the Title VI of the Civil Rights Act of 1964 mentioned in your letter was identified. Corrective action of this deficiency(s) is being implemented to ensure that this issue does not arise again.

Thank you for bringing this matter to our attention.

Sincerely,

Owen Carney, Coordinator
Public Works Department
Opa-locka Transit System
12950 NW 42nd Avenue
Opa-locka, FL 33054

APPENDIX - D

LETTER NOTIFYING COMPLAINANT THAT THE COMPLAINT IS NOT SUBSTANTIATED



Date _____

Complainant's Name _____

Complainant's Address _____

Dear (Mr./Ms.),

The matter referenced in your complaint dated _____ against the Opa-locka Transit System alleging

has been investigated.

The results of the investigation did not validate that there was any violation of the Title VI of the Civil Rights Act of 1964. As you know, Title VI prohibits discrimination based on race, color or national origin in any program receiving federal financial assistance.

The city's attorney has reviewed and analyzed the materials and facts pertaining to your case for evidence that a violation to any of the civil rights laws as occurred. There was no evidence found to substantiate your complaint and we are closing this matter in our files.

You have the right to appeal within ten days of receipt of this final written decision and/or file the complaint directly with the ITA Federal Transit Administration at

Federal Transit Administration
Office of Civil Rights
Attn: Complaint Team
East Building, 5th Floor - TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

Thank you for taking the time to contact us. If we can be of further assistance, please do not hesitate to contact us.

Sincerely,

Owen Carney, Coordinator
Opa-locka Transit System
Public Works Department
12950 NW 42nd Avenue
Opa-locka FL 33054

APPENDIX – E

OPA-LOCKA HISTORY AND DEMOGRAPHICS

The City of Opa-locka is a small community, located in the northwestern area of downtown Miami Dade County, Florida. The city has an area of 4.2 square miles and its total population is 16,463 (Source 2020 Decennial census). The target community represents a highly vulnerable multi-cultural population compounded by 58.5% of Black or African American, 40.9% of Hispanic or Latino, 3.5% of White alone, not Hispanic or Latino, and 0.1% of Asian; that includes elderly and families with small children and women head of households with children living below the poverty line. Opa-locka has high levels of unemployment, under-educated citizens living in poor housing within substandard community infrastructures, battered by seasonal storms and devastated by declared disasters. The community is plagued daily with high indexes of property and violent crime rates. In 2020, the city violent crime rate in Opa-locka was higher than the national violent crime rate by 405% and the city property crime rate was higher than the national property crime rate by 214% (2020 Crime Rate Index).

Opa-locka was founded by aviation pioneer Glenn Curtiss in 1926, who developed the city with a remarkable Moorish architecture style. The Naval Air Station Miami was located in what we know today as the Miami Opa-locka Airport. After the 1926 hurricane, the city was damaged badly, but some of these Moorish style buildings survived the disaster, and today, approximately twenty of the original Moorish revival architectural buildings are listed on the National Register of Historic Places as part of the Opa-locka thematic Resource Area. In the 1980s, the population in Opa-locka transitioned from majority white to majority African American serving as a pioneer in black empowerment in northern Dade County. Back in 1943, Opa-locka hired its first black Police officer, the first Black City Commissioner, Albert Tresvant, was elected to serve for the Opa-locka community in 1972, who later became the first Black Mayor for Opa-locka. The city dedicated a mile long section of Perviz Avenue to be renamed after Barack Obama to honor the first African American President of the United States.

The city has a large general aviation airport, four parks (Sherbondy, Segal, Magnolia, and Ingram), two lakes, and a railroad station, currently known as the Tri Rail Station. The city is combined by residential, commercial, and industrial zones.

In the 1987, a nine-block part of the city repeatedly made the headlines with its abbreviated nickname, “The Triangle”. The area was so overrun with crime and cocaine that the city's public works department blocked all but one of its entrances with metallic security barriers. The area was then hot with heroin; the cocaine trade that developed in the '80s was violent and pervasive. The city removed some of the barriers from the Triangle in 2012. The neighborhood was renamed as “Magnolia North” as part of a rebranding effort to bring about the first visible change. Thanks to the funding assistance of Miami Dade County pass through General Obligation Grant (GOB) and others federal funding sources, the city started the renovations of the Historic City Hall facility, utilized Miami Dade County (MDC) Funding through Community Development Block Grant (CDBG) to demolish and rebuild Helen Miller at Segal Park Community Center and has been able to restore many other projects with the assistance of these funding sources.

Despite the potential for growth and revitalization, Opa-locka faces many challenges daily. Its drinking water, wastewater, and stormwater system is very old and damaged. Opa-locka's gravity sewer collection and distribution system experience many failures because these infrastructures are more than 50 years old, which have led to breakage and damage of the pipe segments. Opa-locka has accomplished some rehabilitations to its gravity collection system, as well as enhanced some of its pump's stations according to its financial capability and with the aid of federal, state, and local funding sources. Deep cleaning projects have been conducted to alleviate the stormwater system and new drainage systems and swale regrading have been installed in some areas in need. Although progress have been made, Opa-locka still has a long way to replace or upgrade its entire stormwater system to meet current and future level of service and finally remedy the significant flooding events that are experienced in the city, specially, in the industrial and commercial area during rainy season.

Moreover, most of the streets in Opa-locka are very damaged with huge potholes causing safety liabilities. Some due to the lack of drainage systems, others just have been deteriorated with the passing of the years, but in some other cases, the soil condition is not very stable because they were used as a landfill in the past. A clear example is a portion of NW 135th Street, Cairo Lane, and NW 127th Street. This zone is plagued with scrap metal businesses. Every year there are fire incidents on these streets where the fire fighters have struggled to access the property and maneuver the equipment to extinguish the fire due to the inconsistent pavement and the huge potholes that are frequently presence on these roads. The heavy traffic that normally frequent the industrial areas of the city also cause damages and shorten the life expectancy of these streets. Opa-locka is a small city with a high index of poverty compared to other cities nationwide; therefore, the city does not count with much revenue to afford the expensive cost to improve its entire infrastructure overnight. Some projects have been divided into different faces to make it more affordable and that way overcome some of the roadway issues. Since 2017, the city has been working in the Milling and Resurfacing Citywide Project prioritizing streets with worse condition, but which are not part of a major infrastructure improvement work plan. This project has been such an enhancement to the city image as well as an improvement to the quality of life and safety for our residents and visitors. As of 2022, five phases have been accomplished with a total of 12.5 miles of repaired streets. Another project that will enhance the image of the city of Opa-locka and will provide safety to our pedestrians is the new sidewalk installation project that the city has initiated in fiscal year 2020, of which we are already at the third phase, and at the end of this phase the city will have installed 5.5 miles of new sidewalk. So far, both projects have been executed with the assistance of the People's Transportation Tax Funding program through Miami Dade County and the Gas Tax Revenue.

DEMOGRAPHIC INFORMATION	OPA-LOCKA	MIAMI DADE COUNTY	FLORIDA	USA
POPULATION	16,463	2,701,767	21,538,187	331,449,281
POPULATION BORN OUTSIDE THE USA	34.0%	54.0%	20.8%	13.5%

POVERTY RATE	40.4%	15.0%	12.4%	11.4%
MEDIAN HOUSEHOLD INCOME	\$22,494	\$53,975	\$57,703	\$64,994
PERSON UNDER FIVE	9.0%	5.8%	5.3%	6.0%
65 YEARS+ POPULATION	12.8%	16.7%	20.9%	16.5%
HIGH SCHOOL GRADUATE OR HIGHER	68.0%	81.8%	88.5%	88.5%
LANGUAGE OTHER THAN ENGLISH SPOKEN AT HOME	47.3%	75.0%	29.4%	21.5%

www.census.gov/quickfacts/fact/table/miamidadecountyflorida,us,Fl,opa-lockacityflorida

Department of Transportation and Public Works (DTPW)
 OFFICE OF CIVIL RIGHTS MUNICIPALITY INFORMATION SHEET
 TITLE VI PROGRAM (FTA C 4702.1B)
 YEARLY UPDATE



Municipality Name	Date:
Address	
Contact Person & Title	
Contact Numbers	
e-mail address	Fax
Legal Status of Organization	Municipality

TITLE VI DEFINITION - *Title VI of the Civil Rights Act of 1964 as amended states "No person in the United States shall, on the grounds of race, color or national origin, be excluded from, participation in, or be denied the benefits of, or be subjected to discrimination under any program, or activity receiving Federal financial assistance."*

ENVIRONMENTAL JUSTICE DEFINITION - *When municipalities plan or program activities that could potentially have a disproportionately high or adverse impact on human health or the environment, recipients should include explicit consideration of the effects on minority populations and low income populations.*

REQUIREMENTS (FTA 4702.1B)	YES	NO	NOTES
Title VI statement clearly posted within dwelling or on company website indicating organization's commitment to providing non-discriminatory services and how to file a Title VI discrimination complaint.			
Tracking system in place to monitor Title VI complaints, as well as a system in place to monitor active Title VI investigations.			
Does municipality collect demographic data?			
Has municipality conferred with DTPW prior to completing a four factor analysis? If answer is NO, what other ways does the municipality provide meaningful access to the population they serve (provide answer in NOTES section).			
Does municipality monitor (every 3 years) the level and quality of service within predominantly minority areas to ensure equitable treatment.			
REQUIREMENTS	YES	NO	NOTES
Does municipality have transit related, non-elected planning boards, advisory councils or committees, or similar bodies selected by municipality? IF YES, please attach a copy of a table depicting the racial breakdown of the membership of the committee and a description of efforts made to encourage participation of minorities on committees or councils. If NO, submit a statement indicating there is NO SUCH TRANSIT-RELATED, NON-ELECTED PLANNING BOARDS, ADVISORY COUNCILS OR COMMITTEES.			
Does municipality plan to raise fares within the next 3 years?			

Does municipality confer with MDT prior to siting or location of facility (vehicle storage facility, maintenance facility or operations center) which requires land acquisition and/or the displacement of persons from their residences and businesses for which a NEPA process has not been completed? A 'facility' does not include bus shelters, transit stations or power substations.			
Does municipality confer with DTPW prior to submitting their Public Participation plan? IF YES, does plan include an outreach plan to engage traditionally underserved persons?			
Does municipality confer with DTPW prior to making service adjustments to current system operations?			
Does municipality confer with DTPW prior to making a decision to prepare an Environmental Assessment (EA) and an Environmental Impact Statement (EIS) when considering new projects?			
Does municipality confer with DTPW prior to determining whether to notice or involve the public when considering proposed Title VI related programs/projects?			
When considering Title VI related programs/projects, does municipality confer with DTPW to ensure all requirements from (FTA C 4702.1B) are adhered to prior to completion?			
ADDITIONAL INFORMATION PLEASE ATTACH A COPY OF ALL INFORMATION REQUESTED AND SUBMIT IT ALONG WITH THE CHECKLIST.			
Please Note that the Municipality is Responsible for IMMEDIATELY notifying DTPW of any changes regarding plans for Service, Fares, Environmental Assessments, Sitings/Locations, Title VI Related Programs and Projects prior to rendering a decision.			

Sponsored by: The City Manager

RESOLUTION NO. 15-9048

**A RESOLUTION OF THE CITY COMMISSION OF THE
CITY OF OPA-LOCKA, FLORIDA, AUTHORIZING THE
CITY MANAGER TO ACCEPT AND IMPLEMENT THE
MIAMI-DADE COUNTY TRANSIT OPA-LOCKA TRANSIT
POLICY; PROVIDING FOR INCORPORATION OF
RECITALS; PROVIDING FOR AN EFFECTIVE DATE**

WHEREAS, The City of Opa-locka currently receives Federal and State Transportation funding; and

WHEREAS, the Florida Department of Transportation (FDOT) and Miami-Dade Transit require that all recipient municipalities implement a non-discrimination policy in compliance with Title VI of the Civil Rights Act of 1964; and

WHEREAS, attached is the City of Opa-locka policy, which the County has already approved.

**NOW, THEREFORE, BE IT DULY RESOLVED BY THE CITY
COMMISSION OF THE CITY OF OPA-LOCKA, FLORIDA:**

Section 1. The recitals to the preamble are hereby incorporated by reference.

Section 2. The City Commission hereby approves the attached non-discrimination policy in compliance with the Civil Rights Act and authorizes the Manager to implement said policy.

Section 3. This Resolution shall be effective immediately upon its adoption.

PASSED AND ADOPTED this 30th day of July, 2015.



MYRA TAYLOR
MAYOR



City of Opa-Locka
Agenda Cover Memo

Commission Meeting Date.	July 14, 2015		Item Type. (Enter X in box)	Resolution	Ordinance		Other	
				X				
Fiscal Impact. (Enter X in box)	Yes	No	Ordinance Reading. (Enter X in box)	1 st Reading		2 nd Reading		
Funding Source. (Enter Acct No.)	X		Public Hearing. (Enter X in box)	Yes	No	Yes	No	
					X		X	
Contract/P.O. Required. (Enter X in box)	Yes	No	RFP/RFQ/Bid #, N/A					
		X						
Strategic Plan Related (Enter X in box)	Yes	No	Strategic Plan Priority Area: Enhance Organizational <input type="checkbox"/> Bus. & Economic Dev <input checked="" type="checkbox"/> Public Safety <input type="checkbox"/> Quality of Education <input type="checkbox"/> Qual. of Life & City Image <input checked="" type="checkbox"/> Communcation <input type="checkbox"/>	Strategic Plan Obj./Strategy: (list the specific objective/strategy this item will address)				
		X		Improve Safety and transportation for our residents, business, stakeholders and visitors				
Sponsor Name	City Manager		Department: CIP	CIP/Public Works & Finance				

A RESOLUTION OF THE CITY COMMISSION OF THE CITY OF OPA-LOCKA, FLORIDA, AUTHORIZING THE CITY MANAGER TO ACCEPT AND IMPLEMENT THE MIAMI DADE COUNTY TRANSIT OPA-LOCKA TRANSIT POLICY FOR THE CITY OF OPA-LOCKA AS REQUIRED BY THE FDOT FOR RECIPIENTS OF STATE AND FEDERAL FUNDING DOLLARS AND THAT SAID POLICY WILL BE MADE PUBLIC ON THE CITY'S WEBSITE AS REQUIRED AND THAT ALL BANNERS, LOGOS AND INFORAMTIONAL MATERIAL SHALL BE PLACED IN PUBLIC PLACES WHERE PEOPLE GATHER TO RIDE THE OPA-LOCKA SHUTTLE AND THAT SAID POLICY MUST BE REVISED LEGISLATIVELY EVERY YEAR IN THE MONTH OF OCTOBER AND SUBMITED TO THE RESPECTIVE FUNDERS AS REQUIRED.

Short Title:

The City of Opa-locka's is in compliance and in accordance with the Federal Transit Administration (FTA) legislation for sub-recipients of funding received through the American Recovery and Reinvestment Plan (ARRA) Economic Stimulus Grant, 'non-discriminatory use of Federal funds by recipients of FTA assistance including their sub-recipients and contractors is prohibited. In compliance with the FTA reporting requirements, the

Miami-Dade Transit Office of Civil Rights and Labor Relations (OCR/LR) is responsible for ensuring that each participating municipality is in compliance with Title VI of the Civil Rights Act of 1964. Specifically, the Title VI Act of 1964 states, "No person in the United States shall, on the grounds of race, color or national origin, be excluded from, participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. Furthermore, federally supported transit services and related benefits must be distributed in an equitable manner. This policy has been approved in its entirety by Miami Dade County Manager of Civil Rights and Labor Relations.

Staff Summary:

The City of Opa-locka has obtained approval for compliance under Federal Title VI Policy for 2015-2016

Proposed Action:

Staff recommends the adoption of the Resolution to authorize the City Manager to implement and revise policy yearly

Attachment:

Attachments: TITLE VI POLICY APPROVED BY MIAMI DADE TRANSIT

Prepared by: Delia Rosa Kennedy, Grant Administrator



Memorandum

TO: Mayor Myra L. Taylor
Vice-Mayor Timothy Homes
Commissioner Joseph L Kelley
Commissioner Luis B Santiago
Commissioner Terrence K Finder

FROM: *Edgar Brown*
Kevin L. Baker, Sr., City Manager

DATE: July 14, 2015

RE: Implementation of Title VI Policy in accordance "Title VI of the Civil Rights Act of 1964" as mandated for entities receiving federal funding

Request: A RESOLUTION OF THE CITY COMMISSION OF THE CITY OF OPA-LOCKA, FLORIDA, AUTHORIZING THE CITY MANAGER TO ACCEPT AND IMPLEMENT THE MIAMI DADE COUNTY TRANSIT OPA-LOCKA TRANSIT POLICY FOR THE CITY OF OPA-LOCKA AS REQUIRED BY THE FDOT FOR RECIPIENTS OF STATE AND FEDERAL FUNDING DOLLARS AND THAT SAID POLICY WILL BE MADE PUBLIC ON THE CITY'S WEBSITE AS REQUIRED AND THAT ALL BANNERS, LOGOS AND INFORMATIONAL MATERIAL SHALL BE PLACED IN PUBLIC PLACES WHERE PEOPLE GATHER TO RIDE THE OPA-LOCKA SHUTTLE AND THAT SAID POLICY MUST BE REVISED LEGISLATIVELY EVERY YEAR IN THE MONTH OF OCTOBER AND SUBMITTED TO THE RESPECTIVE FUNDERS AS REQUIRED

Description: The City of Opa-locka's is in compliance and in accordance with the Federal Transit Administration (FTA) legislation for sub-recipients of funding received through the American Recovery and Reinvestment Plan (ARRA) Economic Stimulus Grant, 'non-discriminatory use of Federal funds by recipients of FTA assistance including their sub-recipients and contractors is prohibited. In compliance with the FTA reporting requirements, the Miami-Dade Transit Office of Civil Rights and Labor Relations (OCR/LR) is responsible for ensuring that each participating municipality is in compliance with Title VI of the Civil Rights Act of 1964. Specifically, the Title VI Act of 1964 states, "No person in the United States shall, on the grounds of race, color or national origin, be excluded from, participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. Furthermore, federally supported transit services and related benefits must be distributed in an equitable manner. This policy has been approved in its entirety by Miami Dade County Manager of Civil Rights and Labor Relations.

Financial Impact: No Impact to the City

Implementation Timeline: Immediately

Legislative History: N/A

Recommendation(s): Staff recommends approval, implementation and yearly update

Attachment(s): COPY OF THE TITLE VI POLICY

Prepared by: Delia Rosa Kennedy, Grant Administrator

END OF MEMORANDUM



Memorandum

TO: Mayor Myra L. Taylor
Vice-Mayor Timothy Homes
Commissioner Joseph L Kelley
Commissioner Luis B Santiago
Commissioner Terrence K Pinder

Eddie Brown
FROM: *Kevin L. Baker, Sr.*, City Manager

DATE: July 14, 2015

RE: Implementation of Title VI Policy in accordance "Title VI of the Civil Rights Act of 1964" as mandated for entities receiving federal funding

Request: A RESOLUTION OF THE CITY COMMISSION OF THE CITY OF OPA-LOCKA, FLORIDA, AUTHORIZING THE CITY MANAGER TO ACCEPT AND IMPLEMENT THE MIAMI DADE COUNTY TRANSIT OPA-LOCKA TRANSIT POLICY FOR THE CITY OF OPA-LOCKA AS REQUIRED BY THE FDOT FOR RECIPIENTS OF STATE AND FEDERAL FUNDING DOLLARS AND THAT SAID POLICY WILL BE MADE PUBLIC ON THE CITY'S WEBSITE AS REQUIRED AND THAT ALL BANNERS, LOGOS AND INFORMATIONAL MATERIAL SHALL BE PLACED IN PUBLIC PLACES WHERE PEOPLE GATHER TO RIDE THE OPA-LOCKA SHUTTLE AND THAT SAID POLICY MUST BE REVISED LEGISLATIVELY EVERY YEAR IN THE MONTH OF OCTOBER AND SUBMITTED TO THE RESPECTIVE FUNDERS AS REQUIRED

Description: The City of Opa-locka's is in compliance and in accordance with the Federal Transit Administration (FTA) legislation for sub-recipients of funding received through the American Recovery and Reinvestment Plan (ARRA) Economic Stimulus Grant, 'non-discriminatory use of Federal funds by recipients of FTA assistance including their sub-recipients and contractors is prohibited. In compliance with the FTA reporting requirements, the Miami-Dade Transit Office of Civil Rights and Labor Relations (OCR/LR) is responsible for ensuring that each participating municipality is in compliance with Title VI of the Civil Rights Act of 1964. Specifically, the Title VI Act of 1964 states, "No person in the United States shall, on the grounds of race, color or national origin, be excluded from, participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. Furthermore, federally supported transit services and related benefits must be distributed in an equitable manner. This policy has been approved in its entirety by Miami Dade County Manager of Civil Rights and Labor Relations.

Financial Impact: No Impact to the City

Implementation Timeline: Immediately

Legislative History: N/A

Recommendation(s): Staff recommends approval, implementation and yearly update

Attachment(s): COPY OF THE TITLE VI POLICY

Prepared by: Delia Rosa Kennedy, Grant Administrator

END OF MEMORANDUM



City of Opa-locka Transit System

OTS

TITLE VI

Program Plan

Effective July 1, 2015

City of Opa-locka Transit System

Title VI Program Plan

Prepared by:

Delia Rosa Kennedy, Grant Administrator

City of Opa-locka

3400 NW 135th Street, Building B

Opa-locka FL 33054

INTRODUCTION

OTS' Commitment to Civil Rights

This update of Opa-locka Transit System's Title VI Program has been prepared to ensure that the level and quality of OTS' fixed route services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to OTS' riders and residents alike. Additionally, through this program, OTS has examined the need for services and materials for persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English.

While it is a matter of principle that OTS is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or subjects to discrimination in the receipt of any of OTS services on the basis of race, color or national origin, the contents of this program have been prepared in accordance with the Section of Title VI of the Civil Rights Act of 1964.

"Federal agencies are to examine the services they provide, identify any need for services to those with limited English proficiency, and develop and implement a system to provide those services so LEP persons can have meaningful access to them."

----- Executive Order 13166

Under the Civil Rights Act of 1964, and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) of the U.S. Department of Transportation (US DOT), HTS has an obligation to ensure that:

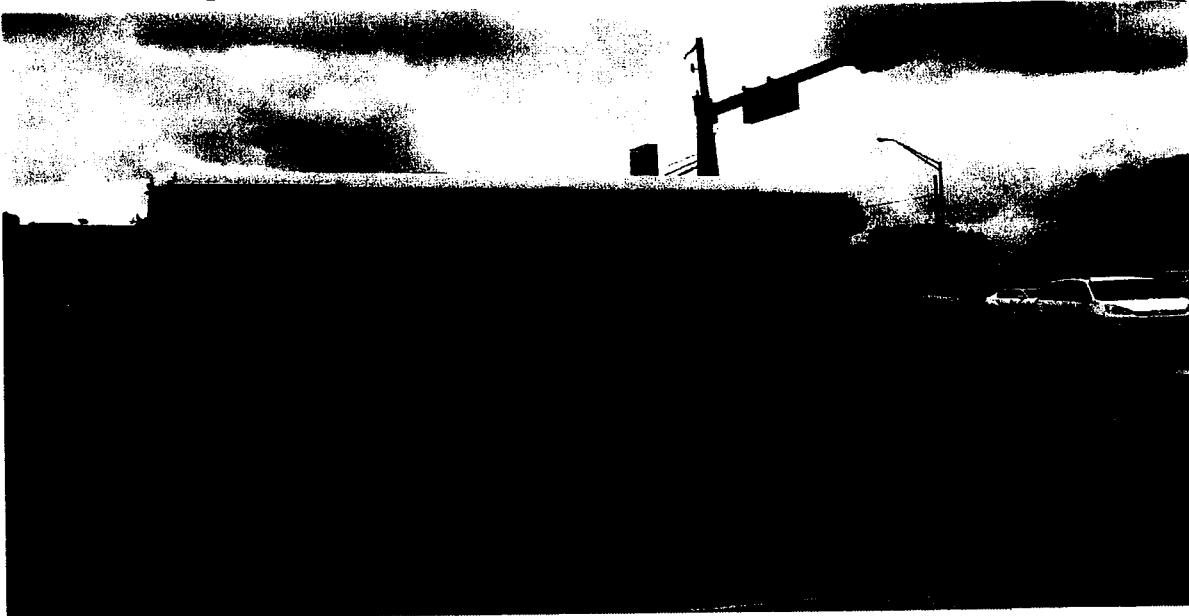
- The benefits of its bus services are shared equitably throughout the service area;
 - The level and quality of bus services are sufficient to provide equal access to all riders in its service area;
 - No one is precluded from participating in OTS service planning and development process;
 - Decisions regarding service changes are made without regard to race, color or national origin and that development benefitting a community as a whole not be unjustifiably done through the disproportionate allocation of its adverse environmental and health burdens on the community's minority population;
- and

GENERAL REQUIREMENTS

Notice to the Public

To make OTS riders aware of its commitment to Title VI compliance, and of their right to file a civil rights compliant, OTS has presented the following language, in both English and Spanish, on decals inside the buses and on its website, WWW.OPALOCKAFL.GOV

Your Civil Rights



OTS operates The Opa-locka Express service without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes they have been aggrieved by any unlawful discriminatory practice under the Title VI may file a complaint with OTS. For more information on OTS' civil rights program and procedures to file a complaint, please contact transit office by email to OCarney@opalockafl.gov or call the office at 305-953-2868 and advised them that you need assistance in obtaining more information on filling out a TITLE VI Complaint form.

Discrimination Complaint Procedures

OTS has established a process for riders to file a complaint under Title VI. Any person who believes that she or he has been discriminated against on the basis of race, color, or national origin by OTS may file a Title VI complaint by completing and submitting the agency's Title VI Complaint form (appendix A) available on our website WWW.OPALOCKAFL.GOV. Download the form, fill it out completely and print it. Mail the completed form to:

Opa-locka Transit System
Title VI Complaint – OCarney@opalockafl.gov
3400 NW 135th Street, Building B, Opa-locka, FL 33054

Note. The City of Opa-locka encourages all complainants to send the complaint forms via certified mail through the US Postal Service, to ensure that all written correspondence can be easily tracked.

The Complaint Procedure

The following procedures apply to complaints filed under Title VI of the Civil Rights Act of 1964, relating to any program and/or activity administered by OTS, and/or contractors. Intimidation or retaliation of any kind is prohibited by law.

These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies, or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant.

OTS investigates complaints received no more than 30 days after the alleged incident. OTS will process complaints that are complete. Once the complaint is received, OTS will review it and the complainant will receive an acknowledgement letter (appendix B) informing them whether the complaint will be investigated by OTS. OTS will then notify the Miami-Dade Transit (MDT) Office of Civil Rights and Labor Relations Allison Aristide – manager of the complaint. (Allison@miamidade.gov) (786-469-5473)

Every effort will be made to obtain early resolution of complaints at the lowest possible level. OTS has up to 60 days to investigate the complaint. If more information is needed to resolve the case, OTS may contact the complainant. The complainant has fifteen days from the date of the letter to send requested information back to OTS. If the information is not received back from the complainant within the fifteen days, OTS can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the complaint is investigated and reviewed, one of two letters will be issued to the complainant, a closure letter (appendix C) or a letter of finding (LOF) (appendix D). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.

A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur.

If the complainant wishes to appeal the decision, she or he has ten days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at:

Federal Transit Administration
Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC 20590



Active Complaints or Inquiries alleging Discrimination

HTS maintains a list of all complaints alleging discrimination. This list is maintained and stored electronically. As of July 1, 2014 there are no Title VI complaints.

List of TITLE VI Investigations, Lawsuits and Complaints

OTS PUBLIC PARTICIPATION PLAN

Key Principles

Public Participation Plan (PPP) process is in place. Any changes that greatly affect the users will need City Council approval. The time and date of these meetings are posted at City Hall in the lobby and are also posted online in the city's webpage (www.opalockafl.gov). The residents may review the agenda and participate in the meeting. The postings usually occur 4 days prior to the meeting. Also any changes that affect will also be posted on the inside of the buses in English and Spanish.

- Potentially affected community members will have the appropriate opportunity to express any concerns that they may have regarding the issue at hand.
- The concerns of the participants involved will be considered in the decision-making process.

Through an open public process, OTS follows a public participation plan to provide for public involvement efforts and enhance access to OTS transportation decision-making process by minority and Limited English Proficient (LEP) populations.

Limited English Proficient (LEP)

LEP refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

OTS will use its Public Participation Plan when considering fare changes, modifications to routes and schedules when:

- A fare increase or significant change in the method of fare payment is being considered;
- A new route is established;
- An existing route is proposed for elimination;

- Considering the total discontinuance of service on any line or group of lines on any given day when service is currently offered;
- Any system-wide change in service hours that exceeds 10% of current total service hours;
- Routing on any given route or routes that affect more than 25% of the riders using the affected route(s).

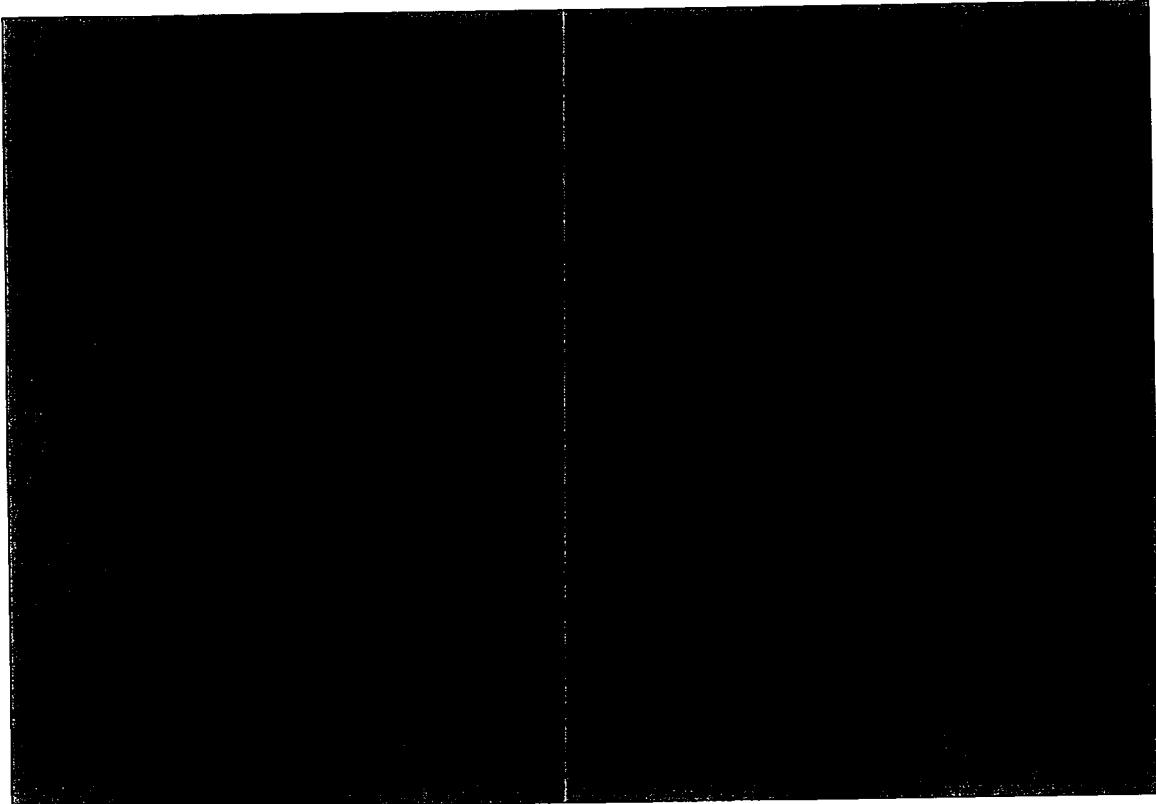
OTS' Public Participation Process

Outreach Efforts – Alerting Riders

OTS' PPP maintains the traditional elements to the outreach program such as seat-drop flyers, driver issued surveys, and by posters and notices on the buses. While there may be minor variations in the outreach process from time -to-time, the outline below provides the general steps for engaging riders in the decision-making process using a fare change as an example;

1. A fare change proposal is developed internally or as a result of public comment;
2. If required, approval from the City Council is sought to proceed to a public comment hearing;
3. Public meetings (City Council) are posted at City Hall in the lobby board and posted online in the city's webpage (www.opalockafl.gov) usually 4 days prior.
4. Bilingual (English & Spanish) public outreach is available;

EXAMPLE OF FARE INCREASE NOTICE PLACED INSIDE BUS.



LANGUAGE ASSISTANCE PLAN

Improving Access for People with Limited English Proficiency

In order to ensure meaningful access to programs and activities, OTS uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps OTS to determine if it communicates effectively with LEP persons and informs language access planning.

The Four Factor Analysis is a local assessment that considers:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by OTS;
2. The frequency with which LEP persons come into contact with OTS services;
3. The nature and importance of OTS' services in people's lives; and
4. The resources available to OTS for LEP outreach, as well as cost associated with that outreach.

Factor 1 – Number of LEP Persons on Service Region

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of LEP persons who may encounter OTS service, their literacy skills in English and their native language, the location of their community and neighborhoods and, more importantly, if any are underserved as a result of a language barrier.

City of Opa-locka Overview

Our transportation efforts, although not enough currently serve the City of Opa-locka, located 10 miles north of downtown Miami, in Miami-Dade County, Florida, is 4.265 square miles and is home to 15,623 residents representing a highly vulnerable population. The target community consists of individuals and families with small children living below the poverty line, elderly in poverty, a population that is predominantly minority, with high levels of unemployment, under-educated, living in substandard housing within substandard community infrastructures, battered by seasonal storms and devastated by declared disasters, living with the daily consequences of the high crime rate, who are blighted by environmental justice concern due to their disproportionate risk of health issues stemming from exposure to contaminants from the proximity of their neighborhoods to Brownfield. In 2010 the City violent crime rate in Opa-locka was higher than the violent crime rate in Florida by 354.3% and the City property crime rate was higher than the property crime rate in Florida by 92.8%. The city violent crime rate for Opa-locka in 2010 was higher than the national violent crime rate average by 510.41% and the City property crime rate was higher than the national property crime rate average by 133.21% (2010 Crime Rate Index).

The population is diverse with the percentage of foreign born individuals at a rate of almost 3 times the national percentage. The target population is in great need of greater opportunities for educational advancement. The population has a marked disparity in educational obtainment with 25.81% of citizens not completing high school in comparison to the state and national average of 15%. Health disparities are often linked to school performance with a direct correlation between school attendance levels and academic success.

Lack of a high school diploma exacerbates generational poverty and unemployment. Though the lack of education and skills training as well as the types of industry in the area contribute to a lack of job opportunities, the blight of the community contributes to lack of development and economic stimulation. Of those employed, 16% are employed in low paying retail jobs. (American Community Survey 2006-2010).

The community has seven elementary schools with over 3,028 children, pre-kindergarten to fifth grade level, traveling to and from school each day. The free and reduced lunch eligible children make up 98% of this population, indicating their extreme poverty. All seven of these schools enroll 100% minority (Black and Hispanic). The reading achievement scores for all of the students in these schools falls far below the state average, many by over 50%. (Source: Florida Department of Education, 2012-2013, retrieved from www.FLDOE.org

Factor 2 – Frequency of LEP Use

There are places where OTS riders of the LEP population can come into contact with OTS service such as fixed route buses and informational calls to customer service. It is important for OTS to ensure that the following points of contact are covered in English and Spanish.

- The use of the bus service;
- Communication with OTS customer service staff;
- Bus pass sales
- Printed outreach materials – ex: Brochures
- Web-based materials
- Meetings – City Council meetings
- Service related posters – notices inside buses

Factor 3 – The Importance of OTS Service to People's Lives

Access to the services provided by OTS' fixed route is critical to the many people in the area. Many depend on OTS' fixed route services for access to jobs and for access to essential community services, shopping and medical appointments. Riders eligible for service under the American's with Disabilities Act (ADA) require service for the same reasons. Because of the essential nature of the services and the importance of these to the many residents in the area, there is a need to ensure that language is not a barrier to access.

In the passenger survey (above), many of them responded to using the buses for multiple reasons. The percentages given is based on just the number of each individual reason for using the bus by the total number of respondents, 96 (%) reported depending on the service for work related transportation, 41(%) reported using the service for school, 75(%) reported using the service for health care, 58(%) reported using the service for shopping – all essential trip purposes.

Factor 4 – Resources and Costs for LEP Outreach

OTS is committed to providing resources to improve access to its services for LEP persons. Today, bilingual information (English/Spanish) is distributed in several different manners including:

- The inside of the Shuttles
- On each pick up point of route
- Will be posted on our web site in English and Spanish
- Brochures are placed in the City Hall Main Entrance

DECISION MAKING BODIES

Non-Elected Committees and Councils

The City of Opa-locka does not have a non-elected committee and/or council or any advisory board regarding this policy of services

SERVICE STANDARDS and POLICIES

Vehicle Capacity

Vehicle Headway (Frequency)

The shuttle buses operate on weekdays, and Saturdays between hours of 6am and 7pm except holiday(s) within the City and connect residents to the Tri Rail station as well as to MDT bus stops. The shuttle services allow residents to connect to areas of work and school outside of the City. It helps local and regional mobility significantly. Our City Commission advised us for the north route extension along NW 151st Street from NW 27th Avenue to NW 37th Avenue. Currently NW 151 Street has shuttle bus services for the commercial area from NW 22 Avenue to NW 27 Avenue but no services for the residential areas between NW 27 Avenue and NW 37th Avenue. The southbound shuttle bus on NW 27th Avenue makes left on NW 151 Street goes towards NW 22nd Avenue.

We are requesting if the southbound shuttle bus can make right turn on NW 151 Street and extend services between NW 27 Avenue and NW 37 Avenue by routing through NW 37 Avenue, Sultan Avenue, Curtis Drive and then back to NW 151 Street towards 22nd Avenue as shown on the attached exhibit-01. This will require about 10 minutes travel time adjustment and will not require any additional bus if this time can be adjusted on the schedule. The schedule for the route on the east side of NW 27th Avenue can be adjusted as it serves only the commercial area. The proposed route extension will help the residential community between NW 27 Avenue and NW 37 Avenue. NW 151 Street is the city limit and the route extension will provide services to the Miami Gardens resident on the north side and Opa-locka residents on the south side. It will enhance the shuttle services popularity and will increase the total ridership.

The shuttle buses through grant funding Job Access Reverse Commute (JARC) operate on weekdays between hours of 6am and 7pm except holiday(s) within the City and connect residents to the Tri Rail station, MDT bus stops, Flea Market, Miami-Dade College and other key areas. The current agreement with the Limousines of South Florida (LSF) does allow LSF to a minimum of thirteen (13) hours operation per day for 5 (five) days a week. The amendment will allow LSF to extend their services for Saturday per the attached schedule and route map.

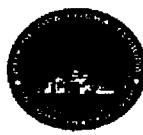
CONTACT

For additional information on the OTS Title VI Plan please contact;

Owen Carney
Opa-locka Transit System
3400 NW 135th Street, Building B
Opa-locka, Florida 33054
Tel. (305) 953-2868
Email: ocarney@opalockafl.gov

Appendix A

Complaint Form



Opa-locka Transit System
Title VI Non-Discrimination Program
Complaint of Discrimination

Complainant (s) Name. <i>Nombre(s) de(los) Reclamante(s).</i>	Complainant(s) Address. <i>Direccion de(los) Reclamante(s).</i>
Complainant (s) Phone Number. <i>Numero de telefono de(los) Reclamante (s).</i>	
Complainant's Representative's Name, Address, Phone Number and Relationship (e.g. friend, attorney, parent, etc); <i>Nombre del representante del Reclamante, direccion, telefono y relacion (por ejemplo amigo, abogado, padres, etc);</i>	
Name and Address of Agency, Institution, or Department Whom You Allege Discriminated Against You; <i>Nombre y Direccion de la agencia, institucion o departamento que usted alega discriminio en su contra;</i>	

Names of the individual(s) Whom You Allege Discriminated Against You (if known);
Nombre(s) de(los) individuo(s) que usted allega discriminaron en su contra (si lo sabe);

I believe the discrimination I experienced was based on: <i>(check all that apply).</i> <i>Creo que la discriminación que yo experimente fue basado en</i> <i>(marque todos los que apliquen).</i>	<input type="radio"/> Race <i>Raza</i> <input type="radio"/> Color <i>Color</i> <input type="radio"/> National Origin <i>Origen Nacional</i>	Date of Alleged Discrimination: <i>Fecha de la Supuesta discriminación.</i>
---	--	--

Mail to: *Envie por correo a:* Opa-locka Transit System 3400 NW 135th Street Building B Opa-locka FL 33054
Ocarney@opalocokafl.gov This form may also be faxed to. *Este formulario tambien se puede enviar por fax a:* 305-953-2900
Attn. Owen Carney
A complaint must be filed no later than 30 days after the date of the alleged discrimination.
Toda queja tiene que ser reportada dentro de los 30 dias siguientes al incidente de alegada discriminación.



**Opa-locka Transit System
Title VI Non-Discrimination Program
Complaint of Discrimination**

Please list the name(s) and phone number(s) of any person, if known, that Opa-locka Transit System could contact for additional information to support or clarify your allegation(s).

Por favor enumere el/los nombre(s) y telefono(s) de cualquier persona, si sabe, que el Transporte de Opa-locka podria contactar para obtener informacion adicional para respaldar o aclarar lo que usted alega.

Please explain as clearly as possible how, why, when and where you believe you were discriminated against. Include as much background information as possible about the alleged acts of discrimination. Additional pages may be attached if needed.

Por favor explique lo más claramente posible como, porque, cuando y donde cree usted que discriminaron en su contra.

Incluya la mayor cantidad de informacion de segundo plano posible acerca de los supuestos actos de discriminación. Puede agregar paginas adicionales si es necesario.

Complainant(s) or Complainant(s) Representatives Signature:

Firma de/los Reclamante(s) o de los representantes de (los) Reclamante(s).

Date of Signature:

Fecha de la Firma:

Appendix B

Letter Acknowledging Receipt of Complaint



Letter Acknowledging Receipt of Complaint

Date

Complainant's Name

Complainant's Address

Dear (Mr/Ms):

This letter is to acknowledge that a complaint has been received from you alleging

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please contact me at 305-953-2868

Owen Carney, Coordinator
City of Opa-locka Transit
3400 NW 135th Street, Building B
Opa-locka, FL 33054

Appendix C

Letter Notifying Complainant that the complaint is Substantiated



City letter head

Date

Complainant's Name

Complainant's Address

Dear (Mr/Ms),

The matter reference in your letter dated _____ against the Opa-locka Transit System alleging of a Title VI violation has been investigated.

The violation of the Title VI of the Civil Rights Act of 1964 mentioned in your letter was identified. Corrective action of this deficiency(s) is being implemented to ensure that this issue does not arise again.

Thank you for bringing this matter to our attention.

Sincerely,

Owen Carney, Coordinator
Opa-locka Transit System
3400 NW 135th Street Building B
Opa-locka, FL 33054

Appendix D

Letter Notifying Complainant that the Complaint is Not Substantiated



Date

Complainant's Name

Complainant's Address

Dear (Mr/Ms):

The matter referenced in your complaint dated _____ against the Opa-locka Transit System alleging

_____ has been investigated.

The results of the investigation did not validate that there was any violation of the Title VI of the Civil Rights Act of 1964. As you know, Title VI prohibits discrimination based on race, color or national origin in any program receiving federal financial assistance.

The city's attorney has reviewed and analyzed the materials and facts pertaining to your case for evidence that a violation to any of the civil rights laws as occurred. There was no evidence found to substantiate your complaint and we are closing this matter in our files.

You have the right to appeal within ten days of receipt of this final written decision and/or file the complaint directly with the FTA Federal Transit Administration at:

Federal Transit Administration Office of Civil Rights
Attn. Title VI Program Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

Thank you for taking the time to contact us. If we can be of further assistance please contact us.

Sincerely,

Owen Carney, Supervisor
City of Opa-locka Transit System
3400 NW 135th Street Building B
Opa-locka Florida 33054

Appendix E

Opa-locka History and Demographics

The City of Opa-locka is a small community, located 10 miles north of downtown Miami in Miami-Dade County, Florida, and is 4.2 square miles and is home to 15,967(census 2013) residents. The target community represents a highly vulnerable multi-cultural population of 97% Black and Hispanic that includes, individuals, elderly, and families with small children and women head of households with children living below the poverty line. Opa-locka has high levels of unemployment, under-educated citizens living in poor housing within substandard community infrastructures, battered by seasonal storms and devastated by declared disasters. The community is plagued daily with the consequences of violent crime rates. For twenty years Opa-locka has been leading the state in most violent crimes and in 2003/2004, the FBI ranked Opa-locka the most dangerous City in America relative to size. In 2010, the City violent crime rate in Opa-locka was higher than the violent crime rate in Florida by 354.3% and in the US by 510.41%. The City property crime rate was higher than the property crime rate in Florida by 92.8% and in the US by 133.21% (2010 Crime Rate Index). Opa-locka was founded by aviation pioneer Glenn Curtiss in 1926 in connection with the development of a general aviation airfield, and a naval base was opened at the Opa-locka airport after the 1926 hurricane. In 1937, Amelia Earhart departed on her ill-fated flight from Opa-locka (now called Miami Opa-locka Airport). With the naval base in operation and the airfield acting as part of the US Navy Training Command during World War II, Opa-locka initially attracted middle class population looking to buy homes. When the Naval base closed in the 1950s, many of the white residents moved out. Working class black residents employed by the rail companies moved in, and by the 1980s, the City had a predominately minority population which remains today at 97%.

In the 1987, a nine-block part of the City repeatedly made the headlines with its abbreviated nickname, "The Triangle." The area was so overrun with crime and cocaine that the City's public works department blocked all but one of its entrances with metallic, security barriers. The area was then hot with heroin; the cocaine trade that developed in the '80s was violent and pervasive.

The city finally removed barriers from the Triangle in 2012. The neighborhood was renamed "Magnolia North" as part of a rebranding effort to bring about the first visible change beginning with GOB Funding to Restore Old City Hall, CDBG Funding to demolish and rebuild Helen Miller at Segal park Community Center and many other CDBG funding for infrastructure and pump station projects.

However, despite the current potential for growth and revitalization, Opa-locka has many challenges to overcome. Threads of corruption and crime still taunt a City who is desperate for change. The City is blighted by scrap yards whose inventories of metals are piled as high as to the sky. Additionally, business owners have been plagued with Cairo Lane 135th Street and 127th Street which was once an abandoned landfill (Minton's), recently caught on fire burning over a hundred cars, tires and automotive paraphernalia that warranted the service of 75+ fire fighters

and over 120,000 gallons of water to get under control. Firefighters main concern was access, as the conditions were deplorable to maneuver equipment to the engulfed flames (Local 10 News Miami September 29, 2014). Mixed fluids and contaminants filtrated back onto the land and into surface and groundwater sources. Our geographic footprint, within Miami-Dade County, has been ranked by the Department of Environmental Protection and the State of Florida at 100th percentile for the dirtiest/worst counties for clean water with impaired or threatened uses of surface waters and water bodies (scorecard.goodguide.com). Due to the City's small geographic size, the target area is community-wide; within the city boundaries. The target vulnerable populations, our elderly, pregnant women and children, and female single head of households with children reside within crime-ridden areas interspersed among recycling businesses and within a dilapidated and dangerous infrastructure. Industrial property uses account for more than 34% of the City's land. In 2011, vacant land of any type (commercial, residential, etc.) composed 22.63% of the City's area. The industry in Opa-locka is dominated by engine suppliers and repair shops for cars, boats and airplanes. The City is also a center for junkyard and recycling businesses. Active CSX freight train tracks run through the Opa-locka dividing neighborhoods, frequently ceasing the flow of traffic and contributing to greenhouse gas emissions. Additionally, when the trains block traffic, it represents significant health and safety concerns to the community residents as it restricts access for medical and police personnel. Brownfield sites within our community have been identified as 67 sites having contamination issues from hazardous and/or petroleum substances. Brownfield properties within our community include old dry cleaner sites, landfills, former military properties, gas stations, properties with illicit dumping, as well as drug-related activities such as Meth Labs. The Florida Department of Environmental Protection (FDEP) Petroleum database (2014) indicates 29 properties with active or pending petroleum cleanup. Five sites are listed in the Superfund database as having prior cleanup activities. Last October, the State of Florida Department of Environmental Protection Clean Water State Revolving Fund awarded a priority funding in excess of \$40 million to the City of Opa-locka which has made the national headlines. Using CDBG Funding also as leverage for funding needed and not part of the State Revolving such as the renovation and rehabilitation of the Opa-locka Community Care and Resource Center. This will be the most ambitious and project of this magnitude in the City's 89 year old history.

Demographic Information

The major disparities facing this community (target area) are poverty levels, minority isolation, reduced educational opportunities, low employment rates and an unhealthy environment. The population of the City in 2013 was 15,967, an increase of 6.8% from the 2000 population of 14,951 US Census Bureau). Over the next 20 years, the population in Opa-locka is expected to grow 11% with an estimated population of 16,817 by 2030 (Shimberg Center, Florida Housing Data Clearinghouse, 2013).

Table 1. Demographic Information	City of Opa-locka	County	State	National
Population	15,219	2,496,435	18,801,310	308,745,538

Population born outside of the United States	34.3%	51.2%	19.3%	12.9%
Poverty Rate	31.85%	27.30%	13.80%	13.80%
Percent Minority	72.3%	26.2%	25%	27.6%
Median Household Income	\$20,379	\$44,299	\$47,661	\$51,914
Percent Not in Workforce	48.5%	37.1%	39.3%	35.3%
Families below Poverty Level	37.6%	15.7%	11.4%	10.9%
Persons under 5	9.3%	5.9%	5.7%	6.3%
Female Head of Household with Children under 18	24.5%	9%	7.1%	7.2%
65 Years+ Below Poverty Level	40.0%	21.7%	10.1%	9.4%
Unemployment	13.51%	8.9%	8.9%	7.9%
Food Stamps Benefits	48.2%	20.2%	11.7%	11.4%
High School Graduate or Higher	60.4%	78%	85.8%	85.7%
Language other than English spoken at home	45.9%	72.3%	27.3%	20.5%

2008-2013 American Community Survey, 5-Year Estimates; available at <http://factfinder2census.gov>.

The population is culturally diverse with the percentage of foreign-born individuals at a rate of almost three times the national percentage. The minority population is about three times greater than the county, state, and national average. The major racial groups in the community consist of African American (64.2%), Hispanic (36.16%), and Caucasian (23%). Within this multi-cultural community, subgroups include Cubans (34.53%), Puerto Ricans (11.67%), and other Hispanic or Latino groups representing Dominican Republic, Central and South America, West Indies and Spain (35.67%).

Department of Transportation and Public Works (DTPW)
 OFFICE OF CIVIL RIGHTS MUNICIPALITY INFORMATION SHEET
 TITLE VI PROGRAM (FTA C 4702.1B)
 YEARLY UPDATE



Municipality Name _____ Date: _____
 Address _____
 Contact Person & Title _____
 Contact Numbers _____
 e-mail address _____ Fax _____
 Legal Status of Organization _____ Municipality _____

TITLE VI DEFINITION - *Title VI of the Civil Rights Act of 1964 as amended states "No person in the United States shall, on the grounds of race, color or national origin, be excluded from, participation in, or be denied the benefits of, or be subjected to discrimination under any program, or activity receiving Federal financial assistance."*

ENVIRONMENTAL JUSTICE DEFINITION - *When municipalities plan or program activities that could potentially have a disproportionately high or adverse impact on human health or the environment, recipients should include explicit consideration of the effects on minority populations and low income populations.*

REQUIREMENTS (FTA 4702.1B)	YES	NO	NOTES
Title VI statement clearly posted within dwelling or on company website indicating organization's commitment to providing non-discriminatory services and how to file a Title VI discrimination complaint.			
Tracking system in place to monitor Title VI complaints, as well as a system in place to monitor active Title VI investigations.			
Does municipality collect demographic data?			
Has municipality conferred with DTPW prior to completing a four factor analysis? If answer is NO, what other ways does the municipality provide meaningful access to the population they serve (provide answer in NOTES section).			
Does municipality monitor (every 3 years) the level and quality of service within predominantly minority areas to ensure equitable treatment.			
REQUIREMENTS	YES	NO	NOTES
Does municipality have transit related, non-elected planning boards, advisory councils or committees, or similar bodies selected by municipality? IF YES, please attach a copy of a table depicting the racial breakdown of the membership of the committee and a description of efforts made to encourage participation of minorities on committees or councils. If NO, submit a statement indicating there is NO SUCH TRANSIT-RELATED, NON-ELECTED PLANNING BOARDS, ADVISORY COUNCILS OR COMMITTEES.			
Does municipality plan to raise fares within the next 3 years?			

Does municipality confer with MDT prior to siting or location of facility (vehicle storage facility, maintenance facility or operations center) which requires land acquisition and/or the displacement of persons from their residences and businesses for which a NEPA process has not been completed? A 'facility' does not include bus shelters, transit stations or power substations.			
Does municipality confer with DTPW prior to submitting their Public Participation plan? IF YES, does plan include an outreach plan to engage traditionally underserved persons?			
Does municipality confer with DTPW prior to making service adjustments to current system operations?			
Does municipality confer with DTPW prior to making a decision to prepare an Environmental Assessment (EA) and an Environmental Impact Statement (EIS) when considering new projects?			
Does municipality confer with DTPW prior to determining whether to notice or involve the public when considering proposed Title VI related programs/projects?			
When considering Title VI related programs/projects, does municipality confer with DTPW to ensure all requirements from (FTA C 4702.1B) are adhered to prior to completion?			
ADDITIONAL INFORMATION			
PLEASE ATTACH A COPY OF ALL INFORMATION REQUESTED AND SUBMIT IT ALONG WITH THE CHECKLIST.			
Please Note that the Municipality is Responsible for IMMEDIATELY notifying DTPW of any changes regarding plans for Service, Fares, Environmental Assessments, Sitings/Locations, Title VI Related Programs and Projects prior to rendering a decision.			

Sponsored by: The City Manager

RESOLUTION NO. 15-9048

**A RESOLUTION OF THE CITY COMMISSION OF THE
CITY OF OPA-LOCKA, FLORIDA, AUTHORIZING THE
CITY MANAGER TO ACCEPT AND IMPLEMENT THE
MIAMI-DADE COUNTY TRANSIT OPA-LOCKA TRANSIT
POLICY; PROVIDING FOR INCORPORATION OF
RECITALS; PROVIDING FOR AN EFFECTIVE DATE**

WHEREAS, The City of Opa-locka currently receives Federal and State Transportation funding; and

WHEREAS, the Florida Department of Transportation (FDOT) and Miami-Dade Transit require that all recipient municipalities implement a non-discrimination policy in compliance with Title VI of the Civil Rights Act of 1964; and

WHEREAS, attached is the City of Opa-locka policy, which the County has already approved.

**NOW, THEREFORE, BE IT DULY RESOLVED BY THE CITY
COMMISSION OF THE CITY OF OPA-LOCKA, FLORIDA:**

Section 1. The recitals to the preamble are hereby incorporated by reference.

Section 2. The City Commission hereby approves the attached non-discrimination policy in compliance with the Civil Rights Act and authorizes the Manager to implement said policy.

Section 3. This Resolution shall be effective immediately upon its adoption.

PASSED AND ADOPTED this 30th day of July, 2015.



MYRA TAYLOR
MAYOR



City of Opa-Locka
Agenda Cover Memo

Commission Meeting Date	July 14, 2015		Item Type: (Enter X in box)	Resolution	Ordinance		Other			
				X						
Fiscal Impact. (Enter X in box)	Yes	No	Ordinance Reading, (Enter X in box)		1st Reading		2nd Reading			
Funding Source. (Enter Acct No.)	X		Public Hearing, (Enter X in box)		Yes	No	Yes	No		
						X		X		
Contract/P.O. Required. (Enter X in box)	Yes	No	Advertising Requirement: (Enter X in box)		Yes	No				
		X			X (Bus Shuttle Pick up and return areas)					
Strategic Plan Related (Enter X in box)	Yes	No	RFP/RFQ/Bid #, N/A							
	X									
Sponsor Name	City Manager		Department: CIP		CIP/Public Works & Finance					

A RESOLUTION OF THE CITY COMMISSION OF THE CITY OF OPA-LOCKA, FLORIDA, AUTHORIZING THE CITY MANAGER TO ACCEPT AND IMPLEMENT THE MIAMI DADE COUNTY TRANSIT OPA-LOCKA TRANSIT POLICY FOR THE CITY OF OPA-LOCKA AS REQUIRED BY THE FDOT FOR RECIPIENTS OF STATE AND FEDERAL FUNDING DOLLARS AND THAT SAID POLICY WILL BE MADE PUBLIC ON THE CITY'S WEBSITE AS REQUIRED AND THAT ALL BANNERS, LOGOS AND INFORAMTIONAL MATERIAL SHALL BE PLACED IN PUBLIC PLACES WHERE PEOPLE GATHER TO RIDE THE OPA-LOCKA SHUTTLE AND THAT SAID POLICY MUST BE REVISED LEGISLATIVELY EVERY YEAR IN THE MONTH OF OCTOBER AND SUBMITED TO THE RESPECTIVE FUNDERS AS REQUIRED.

Short Title:

The City of Opa-locka's is in compliance and in accordance with the Federal Transit Administration (FTA) legislation for sub-recipients of funding received through the American Recovery and Reinvestment Plan (ARRA) Economic Stimulus Grant, 'non-discriminatory use of Federal funds by recipients of FTA assistance including their sub-recipients and contractors is prohibited. In compliance with the FTA reporting requirements, the

Miami-Dade Transit Office of Civil Rights and Labor Relations (OCR/LR) is responsible for ensuring that each participating municipality is in compliance with Title VI of the Civil Rights Act of 1964. Specifically, the Title VI Act of 1964 states, "No person in the United States shall, on the grounds of race, color or national origin, be excluded from, participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. Furthermore, federally supported transit services and related benefits must be distributed in an equitable manner. This policy has been approved in its entirety by Miami Dade County Manager of Civil Rights and Labor Relations.

Staff Summary:

The City of Opa-locka has obtained approval for compliance under Federal Title VI Policy for 2015-2016

Proposed Action:

Staff recommends the adoption of the Resolution to authorize the City Manager to implement and revise policy yearly

Attachment:

Attachments: TITLE VI POLICY APPROVED BY MIAMI DADE TRANSIT

Prepared by: Delia Rosa Kennedy, Grant Administrator



Memorandum

TO: Mayor Myra L. Taylor
Vice-Mayor Timothy Homes
Commissioner Joseph L Kelley
Commissioner Luis B Santiago
Commissioner Terrence K Pinder

Eddie Brown
FROM: *Kevin L. Baker, Sr.*, City Manager

DATE: July 14, 2015

RE: Implementation of Title VI Policy in accordance "Title VI of the Civil Rights Act of 1964" as mandated for entities receiving federal funding

Request: A RESOLUTION OF THE CITY COMMISSION OF THE CITY OF OPA-LOCKA, FLORIDA, AUTHORIZING THE CITY MANAGER TO ACCEPT AND IMPLEMENT THE MIAMI DADE COUNTY TRANSIT OPA-LOCKA TRANSIT POLICY FOR THE CITY OF OPA-LOCKA AS REQUIRED BY THE FDOT FOR RECIPIENTS OF STATE AND FEDERAL FUNDING DOLLARS AND THAT SAID POLICY WILL BE MADE PUBLIC ON THE CITY'S WEBSITE AS REQUIRED AND THAT ALL BANNERS, LOGOS AND INFORMATIONAL MATERIAL SHALL BE PLACED IN PUBLIC PLACES WHERE PEOPLE GATHER TO RIDE THE OPA-LOCKA SHUTTLE AND THAT SAID POLICY MUST BE REVISED LEGISLATIVELY EVERY YEAR IN THE MONTH OF OCTOBER AND SUBMITTED TO THE RESPECTIVE FUNDERS AS REQUIRED

Description: The City of Opa-locka's is in compliance and in accordance with the Federal Transit Administration (FTA) legislation for sub-recipients of funding received through the American Recovery and Reinvestment Plan (ARRA) Economic Stimulus Grant, 'non-discriminatory use of Federal funds by recipients of FTA assistance including their sub-recipients and contractors is prohibited. In compliance with the FTA reporting requirements, the Miami-Dade Transit Office of Civil Rights and Labor Relations (OCR/LR) is responsible for ensuring that each participating municipality is in compliance with Title VI of the Civil Rights Act of 1964. Specifically, the Title VI Act of 1964 states, "No person in the United States shall, on the grounds of race, color or national origin, be excluded from, participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. Furthermore, federally supported transit services and related benefits must be distributed in an equitable manner. This policy has been approved in its entirety by Miami Dade County Manager of Civil Rights and Labor Relations.

Financial Impact: No Impact to the City

Implementation Timeline: Immediately

Received 07/29/15
@ 10:55am

Legislative History: N/A

Recommendation(s): Staff recommends approval, implementation and yearly update

Attachment(s): COPY OF THE TITLE VI POLICY

Prepared by: Delia Rosa Kennedy, Grant Administrator

END OF MEMORANDUM



Memorandum

TO: Mayor Myra L. Taylor
Vice-Mayor Timothy Homes
Commissioner Joseph L Kelley
Commissioner Luis B Santiago
Commissioner Terrence K Pinder

FROM: *Eddie Brown*
Kelvin L. Baker, Sr., City Manager

DATE: July 14, 2015

RE: Implementation of Title VI Policy in accordance "Title VI of the Civil Rights Act of 1964" as mandated for entities receiving federal funding

Request: A RESOLUTION OF THE CITY COMMISSION OF THE CITY OF OPA-LOCKA, FLORIDA, AUTHORIZING THE CITY MANAGER TO ACCEPT AND IMPLEMENT THE MIAMI DADE COUNTY TRANSIT OPA-LOCKA TRANSIT POLICY FOR THE CITY OF OPA-LOCKA AS REQUIRED BY THE FDOT FOR RECIPIENTS OF STATE AND FEDERAL FUNDING DOLLARS AND THAT SAID POLICY WILL BE MADE PUBLIC ON THE CITY'S WEBSITE AS REQUIRED AND THAT ALL BANNERS, LOGOS AND INFORMATIONAL MATERIAL SHALL BE PLACED IN PUBLIC PLACES WHERE PEOPLE GATHER TO RIDE THE OPA-LOCKA SHUTTLE AND THAT SAID POLICY MUST BE REVISED LEGISLATIVELY EVERY YEAR IN THE MONTH OF OCTOBER AND SUBMITTED TO THE RESPECTIVE FUNDERS AS REQUIRED

Description: The City of Opa-locka's is in compliance and in accordance with the Federal Transit Administration (FTA) legislation for sub-recipients of funding received through the American Recovery and Reinvestment Plan (ARRA) Economic Stimulus Grant, 'non-discriminatory use of Federal funds by recipients of FTA assistance including their sub-recipients and contractors is prohibited. In compliance with the FTA reporting requirements, the Miami-Dade Transit Office of Civil Rights and Labor Relations (OCR/LR) is responsible for ensuring that each participating municipality is in compliance with Title VI of the Civil Rights Act of 1964. Specifically, the Title VI Act of 1964 states, "No person in the United States shall, on the grounds of race, color or national origin, be excluded from, participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. Furthermore, federally supported transit services and related benefits must be distributed in an equitable manner. This policy has been approved in its entirety by Miami Dade County Manager of Civil Rights and Labor Relations.

Financial Impact: No Impact to the City

Implementation Timeline: Immediately

Legislative History: N/A

Recommendation(s): Staff recommends approval, implementation and yearly update

Attachment(s): COPY OF THE TITLE VI POLICY

Prepared by: Delia Rosa Kennedy, Grant Administrator

END OF MEMORANDUM



City of Opa-locka Transit System

OTS

TITLE VI

Program Plan

Effective July 1, 2015

City of Opa-locka Transit System

Title VI Program Plan

Prepared by:

Delia Rosa Kennedy, Grant Administrator

City of Opa-locka

3400 NW 135th Street, Building B

Opa-locka FL 33054

INTRODUCTION

OTS' Commitment to Civil Rights

This update of Opa-locka Transit System's Title VI Program has been prepared to ensure that the level and quality of OTS' fixed route services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to OTS' riders and residents alike. Additionally, through this program, OTS has examined the need for services and materials for persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English.

While it is a matter of principle that OTS is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or subjects to discrimination in the receipt of any of OTS services on the basis of race, color or national origin, the contents of this program have been prepared in accordance with the Section of Title VI of the Civil Rights Act of 1964.

"Federal agencies are to examine the services they provide, identify any need for services to those with limited English proficiency, and develop and implement a system to provide those services so LEP persons can have meaningful access to them."

----- Executive Order 13166

Under the Civil Rights Act of 1964, and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) of the U.S. Department of Transportation (US DOT), HTS has an obligation to ensure that:

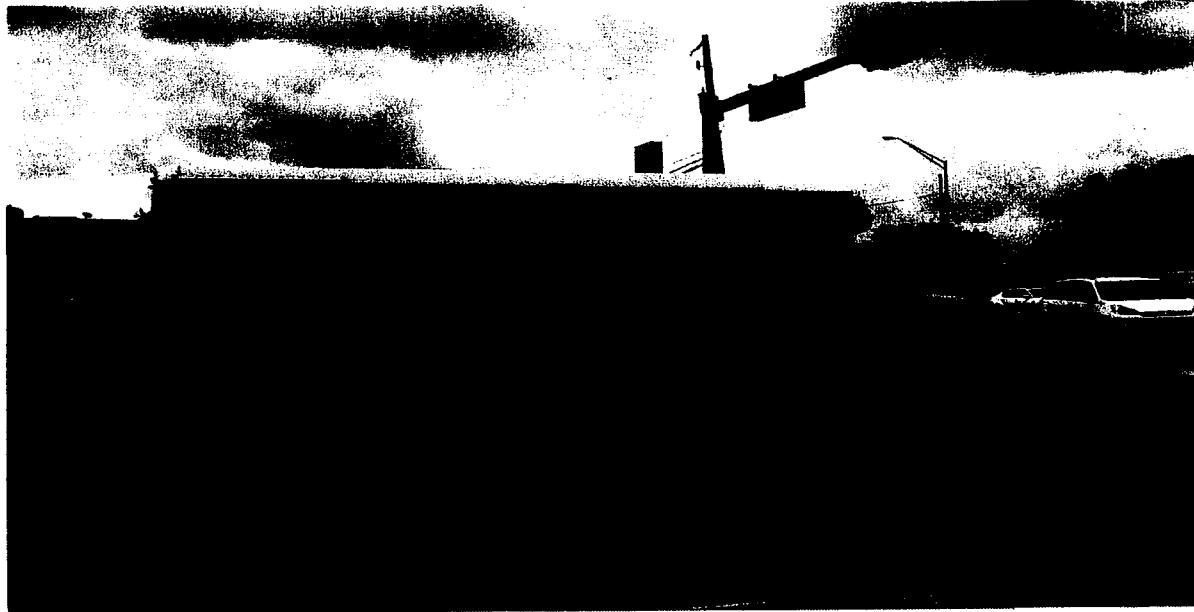
- The benefits of its bus services are shared equitably throughout the service area;
 - The level and quality of bus services are sufficient to provide equal access to all riders in its service area;
 - No one is precluded from participating in OTS service planning and development process;
 - Decisions regarding service changes are made without regard to race, color or national origin and that development benefitting a community as a whole not be unjustifiably done through the disproportionate allocation of its adverse environmental and health burdens on the community's minority population;
- and

GENERAL REQUIREMENTS

Notice to the Public

To make OTS riders aware of its commitment to Title VI compliance, and of their right to file a civil rights compliant, OTS has presented the following language, in both English and Spanish, on decals inside the buses and on its website: WWW.OPALOCKAFL.GOV

Your Civil Rights



OTS operates The Opa-locka Express service without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes they have been aggrieved by any unlawful discriminatory practice under the Title VI may file a complaint with OTS. For more information on OTS' civil rights program and procedures to file a complaint, please contact transit office by email to OCarney@opalockafl.gov or call the office at 305-953-2868 and advised them that you need assistance in obtaining more information on filling out a TITLE VI Complaint form.

Discrimination Complaint Procedures

OTS has established a process for riders to file a complaint under Title VI. Any person who believes that she or he has been discriminated against on the basis of race, color, or national origin by OTS may file a Title VI complaint by completing and submitting the agency's Title VI Complaint form (appendix A) available on our website WWW.OPALOCKAFL.GOV. Download the form, fill it out completely and print it. Mail the completed form to.

Opa-locka Transit System
Title VI Complaint – OCarney@opalockafl.gov
3400 NW 135th Street, Building B, Opa-locka, FL 33054

Note. The City of Opa-locka encourages all complainants to send the complaint forms via certified mail through the US Postal Service, to ensure that all written correspondence can be easily tracked.

The Complaint Procedure

The following procedures apply to complaints filed under Title VI of the Civil Rights Act of 1964, relating to any program and/or activity administered by OTS, and/or contractors. Intimidation or retaliation of any kind is prohibited by law.

These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies, or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant.

OTS investigates complaints received no more than 30 days after the alleged incident. OTS will process complaints that are complete. Once the complaint is received, OTS will review it and the complainant will receive an acknowledgement letter (appendix B) informing them whether the complaint will be investigated by OTS. OTS will then notify the Miami-Dade Transit (MDT) Office of Civil Rights and Labor Relations Allison Aristide – manager of the complaint. (Allison@miamidade.gov) (786-469-5473)

Every effort will be made to obtain early resolution of complaints at the lowest possible level. OTS has up to 60 days to investigate the complaint. If more information is needed to resolve the case, OTS may contact the complainant. The complainant has fifteen days from the date of the letter to send requested information back to OTS. If the information is not received back from the complainant within the fifteen days, OTS can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the complaint is investigated and reviewed, one of two letters will be issued to the complainant, a closure letter (appendix C) or a letter of finding (LOF) (appendix D). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.

A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur.

If the complainant wishes to appeal the decision, she or he has ten days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at:

Federal Transit Administration
Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC 20590



Active Complaints or Inquiries alleging Discrimination

HTS maintains a list of all complaints alleging discrimination. This list is maintained and stored electronically. As of July 1, 2014 there are no Title VI complaints.

List of TITLE VI Investigations, Lawsuits and Complaints

OTS PUBLIC PARTICIPATION PLAN

Key Principles

Public Participation Plan (PPP) process is in place. Any changes that greatly affect the users will need City Council approval. The time and date of these meetings are posted at City Hall in the lobby and are also posted online in the city's webpage (www.opalockafl.gov). The residents may review the agenda and participate in the meeting. The postings usually occur 4 days prior to the meeting. Also any changes that affect will also be posted on the inside of the buses in English and Spanish.

- Potentially affected community members will have the appropriate opportunity to express any concerns that they may have regarding the issue at hand.
- The concerns of the participants involved will be considered in the decision-making process.

Through an open public process, OTS follows a public participation plan to provide for public involvement efforts and enhance access to OTS transportation decision-making process by minority and Limited English Proficient (LEP) populations.

Limited English Proficient (LEP)

LEP refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

OTS will use its Public Participation Plan when considering fare changes, modifications to routes and schedules when:

- A fare increase or significant change in the method of fare payment is being considered;
- A new route is established;
- An existing route is proposed for elimination;

- Considering the total discontinuance of service on any line or group of lines on any given day when service is currently offered;
- Any system-wide change in service hours that exceeds 10% of current total service hours;
- Routing on any given route or routes that affect more than 25% of the riders using the affected route(s).

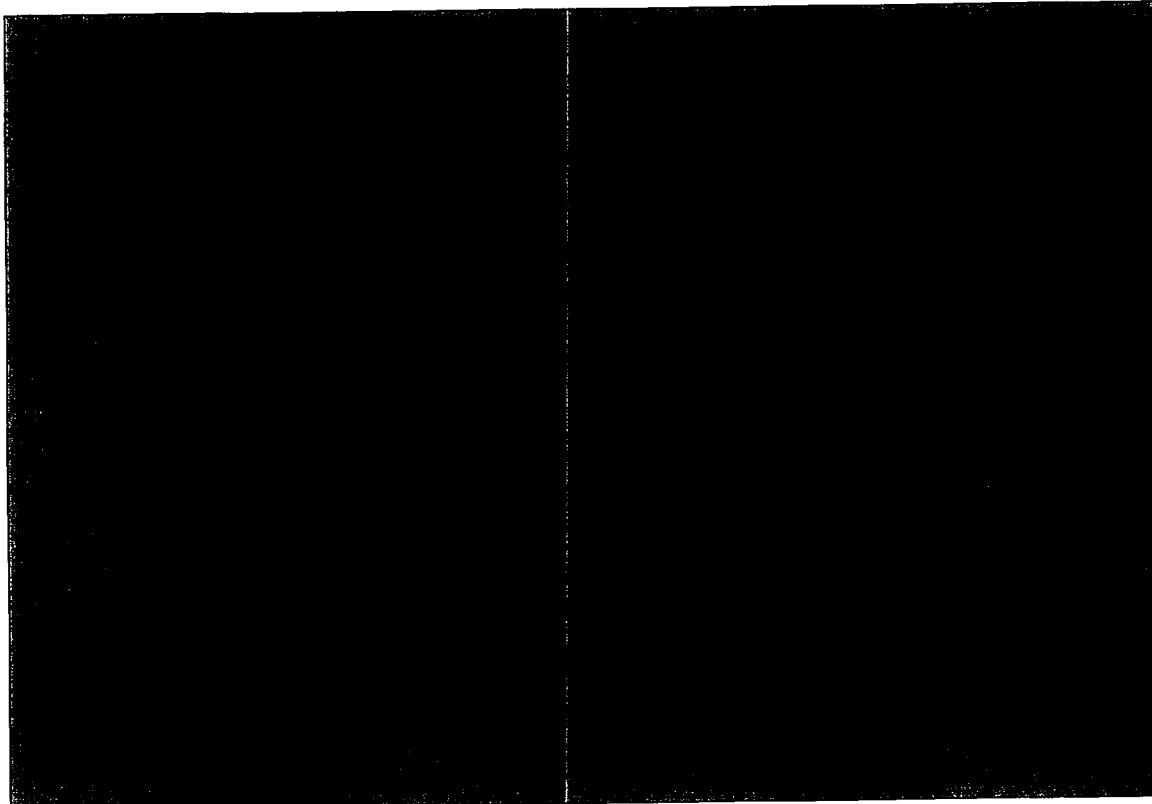
OTS' Public Participation Process

Outreach Efforts – Alerting Riders

OTS' PPP maintains the traditional elements to the outreach program such as seat-drop flyers, driver issued surveys, and by posters and notices on the buses. While there may be minor variations in the outreach process from time –to-time, the outline below provides the general steps for engaging riders in the decision-making process using a fare change as an example;

1. A fare change proposal is developed internally or as a result of public comment;
2. If required, approval from the City Council is sought to proceed to a public comment hearing;
3. Public meetings (City Council) are posted at City Hall in the lobby board and posted online in the city's webpage (www.opalockafl.gov) usually 4 days prior.
4. Bilingual (English & Spanish) public outreach is available;

EXAMPLE OF FARE INCREASE NOTICE PLACED INSIDE BUS.



LANGUAGE ASSISTANCE PLAN

Improving Access for People with Limited English Proficiency

In order to ensure meaningful access to programs and activities, OTS uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps OTS to determine if it communicates effectively with LEP persons and informs language access planning.

The Four Factor Analysis is a local assessment that considers:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by OTS;
2. The frequency with which LEP persons come into contact with OTS services;
3. The nature and importance of OTS' services in people's lives; and
4. The resources available to OTS for LEP outreach, as well as cost associated with that outreach.

Factor 1 – Number of LEP Persons on Service Region

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of LEP persons who may encounter OTS service, their literacy skills in English and their native language, the location of their community and neighborhoods and, more importantly, if any are underserved as a result of a language barrier.

City of Opa-locka Overview

Our transportation efforts, although not enough currently serve the City of Opa-locka, located 10 miles north of downtown Miami, in Miami-Dade County, Florida, is 4.265 square miles and is home to 15,623 residents representing a highly vulnerable population. The target community consists of individuals and families with small children living below the poverty line, elderly in poverty, a population that is predominantly minority, with high levels of unemployment, under-educated, living in substandard housing within substandard community infrastructures, battered by seasonal storms and devastated by declared disasters, living with the daily consequences of the high crime rate, who are blighted by environmental justice concern due to their disproportionate risk of health issues stemming from exposure to contaminants from the proximity of their neighborhoods to Brownfield. In 2010 the City violent crime rate in Opa-locka was higher than the violent crime rate in Florida by 354.3% and the City property crime rate was higher than the property crime rate in Florida by 92.8%. The city violent crime rate for Opa-locka in 2010 was higher than the national violent crime rate average by 510.41% and the City property crime rate was higher than the national property crime rate average by 133.21% (2010 Crime Rate Index).

The population is diverse with the percentage of foreign born individuals at a rate of almost 3 times the national percentage. The target population is in great need of greater opportunities for educational advancement. The population has a marked disparity in educational obtainment with 25.81% of citizens not completing high school in comparison to the state and national average of 15%. Health disparities are often linked to school performance with a direct correlation between school attendance levels and academic success.

Lack of a high school diploma exacerbates generational poverty and unemployment. Though the lack of education and skills training as well as the types of industry in the area contribute to a lack of job opportunities, the blight of the community contributes to lack of development and economic stimulation. Of those employed, 16% are employed in low paying retail jobs. (American Community Survey 2006-2010).

The community has seven elementary schools with over 3,028 children, pre-kindergarten to fifth grade level, traveling to and from school each day. The free and reduced lunch eligible children make up 98% of this population, indicating their extreme poverty. All seven of these schools enroll 100% minority (Black and Hispanic). The reading achievement scores for all of the students in these schools falls far below the state average, many by over 50%. (Source: Florida Department of Education, 2012-2013, retrieved from www.FLDOE.org

Factor 2 – Frequency of LEP Use

There are places where OTS riders of the LEP population can come into contact with OTS service such as fixed route buses and informational calls to customer service. It is important for OTS to ensure that the following points of contact are covered in English and Spanish.

- The use of the bus service;
- Communication with OTS customer service staff;
- Bus pass sales
- Printed outreach materials – ex. Brochures
- Web-based materials
- Meetings – City Council meetings
- Service related posters – notices inside buses

Factor 3 – The Importance of OTS Service to People's Lives

Access to the services provided by OTS' fixed route is critical to the many people in the area. Many depend on OTS' fixed route services for access to jobs and for access to essential community services, shopping and medical appointments. Riders eligible for service under the American's with Disabilities Act (ADA) require service for the same reasons. Because of the essential nature of the services and the importance of these to the many residents in the area, there is a need to ensure that language is not a barrier to access.

In the passenger survey (above), many of them responded to using the buses for multiple reasons. The percentages given is based on just the number of each individual reason for using the bus by the total number of respondents, 96 (%) reported depending on the service for work related transportation, 41(%) reported using the service for school, 75(%) reported using the service for health care, 58(%) reported using the service for shopping – all essential trip purposes.

Factor 4 – Resources and Costs for LEP Outreach

OTS is committed to providing resources to improve access to its services for LEP persons. Today, bilingual information (English/Spanish) is distributed in several different manners including:

- The inside of the Shuttles
- On each pick up point of route
- Will be posted on our web site in English and Spanish
- Brochures are placed in the City Hall Main Entrance

DECISION MAKING BODIES

Non-Elected Committees and Councils

The City of Opa-locka does not have a non-elected committee and/or council or any advisory board regarding this policy of services

SERVICE STANDARDS and POLICIES

Vehicle Capacity

Vehicle Headway (Frequency)

The shuttle buses operate on weekdays, and Saturdays between hours of 6am and 7pm except holiday(s) within the City and connect residents to the Tri Rail station as well as to MDT bus stops. The shuttle services allow residents to connect to areas of work and school outside of the City. It helps local and regional mobility significantly. Our City Commission advised us for the north route extension along NW 151st Street from NW 27th Avenue to NW 37th Avenue. Currently NW 151 Street has shuttle bus services for the commercial area from NW 22 Avenue to NW 27 Avenue but no services for the residential areas between NW 27 Avenue and NW 37th Avenue. The southbound shuttle bus on NW 27th Avenue makes left on NW 151 Street goes towards NW 22nd Avenue.

We are requesting if the southbound shuttle bus can make right turn on NW 151 Street and extend services between NW 27 Avenue and NW 37 Avenue by routing through NW 37 Avenue, Sultan Avenue, Curtis Drive and then back to NW 151 Street towards 22nd Avenue as shown on the attached exhibit-01. This will require about 10 minutes travel time adjustment and will not require any additional bus if this time can be adjusted on the schedule. The schedule for the route on the east side of NW 27th Avenue can be adjusted as it serves only the commercial area. The proposed route extension will help the residential community between NW 27 Avenue and NW 37 Avenue. NW 151 Street is the city limit and the route extension will provide services to the Miami Gardens resident on the north side and Opa-locka residents on the south side. It will enhance the shuttle services popularity and will increase the total ridership.

The shuttle buses through grant funding Job Access Reverse Commute (JARC) operate on weekdays between hours of 6am and 7pm except holiday(s) within the City and connect residents to the Tri Rail station, MDT bus stops, Flea Market, Miami-Dade College and other key areas. The current agreement with the Limousines of South Florida (LSF) does allow LSF to a minimum of thirteen (13) hours operation per day for 5 (five) days a week. The amendment will allow LSF to extend their services for Saturday per the attached schedule and route map.

CONTACT

For additional information on the OTS Title VI Plan please contact;

Owen Carney
Opa-locka Transit System
3400 NW 135th Street, Building B
Opa-locka, Florida 33054
Tel. (305) 953-2868
Email: ocarney@opalockafl.gov

Appendix A

Complaint Form



**Opa-locka Transit System
Title VI Non-Discrimination Program
Complaint of Discrimination**

Complainant (s) Name. <i>Nombre(s) de(los) Reclamante(s).</i>	Complainant(s) Address. <i>Direccion de(los) Reclamante(s).</i>
Complainant (s) Phone Number. <i>Numero de telefono de(los) Reclamante (s).</i>	
Complainant's Representative's Name, Address, Phone Number and Relationship (e.g. friend, attorney, parent, etc); <i>Nombre del representante del Reclamante, direccion, telefono y relacion (por ejemplo amigo, abogado, padres, etc);</i>	
Name and Address of Agency, Institution, or Department Whom You Allege Discriminated Against You; <i>Nombre y Direccion de la agencia, institucion o departamento que usted alega discrimino en su contra;</i>	

Names of the individual(s) Whom You Allege Discriminated Against You (if known);
Nombre(s) de los) individuo(s) que usted alega discriminaron en su contra (si lo sabe);

I believe the discrimination I experienced was based on. (check all that apply). <i>Creo que la discriminación que yo experimente fue basado en</i> <i>(marque todos los que apliquen).</i>	<input type="radio"/> Race <i>Raza</i> <input type="radio"/> Color <i>Color</i> <input type="radio"/> National Origin <i>Origen Nacional</i>	Date of Alleged Discrimination. <i>Fecha de la Supuesta discriminación.</i>
--	--	--

Mail to. *Envie por correo a.* Opa-locka Transit System 3400 NW 135th Street Building B Opa-locka FL 33054
Ocarney@opalocokafl.gov This form may also be faxed to. *Este formulario tambien se puede enviar por fax a.* 305-953-2900

Attn. Owen Carney

A complaint must be filed no later than 30 days after the date of the alleged discrimination.

Toda queja tiene que ser reportada dentro de los 30 dias siguientes al incidente de alegada discriminación.



**Opa-locka Transit System
Title VI Non-Discrimination Program
Complaint of Discrimination**

Please list the name(s) and phone number(s) of any person, if known, that Opa-locka Transit System could contact for additional information to support or clarify your allegation(s).

Por favor enumere el/los nombre(s) y telefono(s) de cualquier persona, si sabe, que el Transporte de Opa-locka podria contactar para obtener informacion adicional para respaldar o aclarar lo que usted alega.

Please explain as clearly as possible how, why, when and where you believe you were discriminated against. Include as much background information as possible about the alleged acts of discrimination. Additional pages may be attached if needed.

*Por favor explique lo más claramente posible como, porque, cuando y donde cree usted que discriminaron en su contra.
Incluya la mayor cantidad de informacion de segundo plano posible acerca de los supuestos actos de discriminación. Puede agregar paginas adicionales si es necesario.*

Complainant(s) or Complainant(s) Representatives Signature:

Firma de/los Reclamante(s) o de los representantes de /los Reclamante(s).

Date of Signature:

Fecha de la Firma:

Appendix B

Letter Acknowledging Receipt of Complaint



Letter Acknowledging Receipt of Complaint

Date

Complainant's Name

Complainant's Address

Dear (Mr/Ms),

This letter is to acknowledge that a complaint has been received from you alleging

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please contact me at 305-953-2868

Owen Carney, Coordinator
City of Opa-locka Transit
3400 NW 135th Street, Building B
Opa-locka, FL 33054

Appendix C

Letter Notifying Complainant that the complaint is Substantiated



City letter head

Date

Complainant's Name

Complainant's Address

Dear (Mr/Ms):

The matter reference in your letter dated _____ against the Opa-locka Transit System alleging of a Title VI violation has been investigated.

The violation of the Title VI of the Civil Rights Act of 1964 mentioned in your letter was identified. Corrective action of this deficiency(s) is being implemented to ensure that this issue does not arise again.

Thank you for bringing this matter to our attention.

Sincerely,

Owen Carney, Coordinator
Opa-locka Transit System
3400 NW 135th Street Building B
Opa-locka, FL 33054

Appendix D

Letter Notifying Complainant that the Complaint is Not Substantiated



Date

Complainant's Name

Complainant's Address

Dear (Mr/Ms):

The matter referenced in your complaint dated _____ against the Opa-locka Transit System alleging

_____ has been investigated.

The results of the investigation did not validate that there was any violation of the Title VI of the Civil Rights Act of 1964. As you know, Title VI prohibits discrimination based on race, color or national origin in any program receiving federal financial assistance.

The city's attorney has reviewed and analyzed the materials and facts pertaining to your case for evidence that a violation to any of the civil rights laws as occurred. There was no evidence found to substantiate your complaint and we are closing this matter in our files.

You have the right to appeal within ten days of receipt of this final written decision and/or file the complaint directly with the FTA Federal Transit Administration at:

Federal Transit Administration Office of Civil Rights
Attn. Title VI Program Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

Thank you for taking the time to contact us. If we can be of further assistance please contact us.

Sincerely,

Owen Carney, Supervisor
City of Opa-locka Transit System
3400 NW 135th Street Building B
Opa-locka Florida 33054

Appendix E

Opa-locka History and Demographics

The City of Opa-locka is a small community, located 10 miles north of downtown Miami in Miami-Dade County, Florida, and is 4.2 square miles and is home to 15,967(census 2013) residents. The target community represents a highly vulnerable multi-cultural population of 97% Black and Hispanic that includes, individuals, elderly, and families with small children and women head of households with children living below the poverty line. Opa-locka has high levels of unemployment, under-educated citizens living in poor housing within substandard community infrastructures, battered by seasonal storms and devastated by declared disasters. The community is plagued daily with the consequences of violent crime rates. For twenty years Opa-locka has been leading the state in most violent crimes and in 2003/2004, the FBI ranked Opa-locka the most dangerous City in America relative to size. In 2010, the City violent crime rate in Opa-locka was higher than the violent crime rate in Florida by 354.3% and in the US by 510.41%. The City property crime rate was higher than the property crime rate in Florida by 92.8% and in the US by 133.21% (2010 Crime Rate Index). Opa-locka was founded by aviation pioneer Glenn Curtiss in 1926 in connection with the development of a general aviation airfield, and a naval base was opened at the Opa-locka airport after the 1926 hurricane. In 1937, Amelia Earhart departed on her ill-fated flight from Opa-locka (now called Miami Opa-locka Airport). With the naval base in operation and the airfield acting as part of the US Navy Training Command during World War II, Opa-locka initially attracted middle class population looking to buy homes. When the Naval base closed in the 1950s, many of the white residents moved out. Working class black residents employed by the rail companies moved in, and by the 1980s, the City had a predominately minority population which remains today at 97%.

In the 1987, a nine-block part of the City repeatedly made the headlines with its abbreviated nickname, "The Triangle." The area was so overrun with crime and cocaine that the City's public works department blocked all but one of its entrances with metallic, security barriers. The area was then hot with heroin; the cocaine trade that developed in the '80s was violent and pervasive.

The city finally removed barriers from the Triangle in 2012. The neighborhood was renamed "Magnolia North" as part of a rebranding effort to bring about the first visible change beginning with GOB Funding to Restore Old City Hall, CDBG Funding to demolish and rebuild Helen Miller at Segal park Community Center and many other CDBG funding for infrastructure and pump station projects.

However, despite the current potential for growth and revitalization, Opa-locka has many challenges to overcome. Threads of corruption and crime still taunt a City who is desperate for change. The City is blighted by scrap yards whose inventories of metals are piled as high as to the sky. Additionally, business owners have been plagued with Cairo Lane 135th Street and 127th Street which was once an abandoned landfill (Minton's), recently caught on fire burning over a hundred cars, tires and automotive paraphernalia that warranted the service of 75+ fire fighters

and over 120,000 gallons of water to get under control. Firefighters main concern was access, as the conditions were deplorable to maneuver equipment to the engulfed flames (Local 10 News Miami September 29, 2014). Mixed fluids and contaminants filtrated back onto the land and into surface and groundwater sources. Our geographic footprint, within Miami-Dade County, has been ranked by the Department of Environmental Protection and the State of Florida at 100th percentile for the dirtiest/worst counties for clean water with impaired or threatened uses of surface waters and water bodies (scorecard.goodguide.com). Due to the City's small geographic size, the target area is community-wide; within the city boundaries. The target vulnerable populations, our elderly, pregnant women and children, and female single head of households with children reside within crime-ridden areas interspersed among recycling businesses and within a dilapidated and dangerous infrastructure. Industrial property uses account for more than 34% of the City's land. In 2011, vacant land of any type (commercial, residential, etc.) composed 22.63% of the City's area. The industry in Opa-locka is dominated by engine suppliers and repair shops for cars, boats and airplanes. The City is also a center for junkyard and recycling businesses. Active CSX freight train tracks run through the Opa-locka dividing neighborhoods, frequently ceasing the flow of traffic and contributing to greenhouse gas emissions. Additionally, when the trains block traffic, it represents significant health and safety concerns do the community residents as it restricts access for medial and police personnel. Brownfield sites within our community have been identified as 67 sites having contamination issues from hazardous and/or petroleum substances. Brownfield properties within our community include old dry cleaner sites, landfills, former military properties, gas stations, properties with illicit dumping, as well as drug-related activities such as Meth Labs. The Florida Department of Environmental Protection (FDEP) Petroleum database (2014) indicates 29 properties with active or pending petroleum cleanup. Five sites are listed in the Superfund database as having prior cleanup activities. Last October, the State of Florida Department of Environmental Protection Clean Water State Revolving Fund awarded a priority funding in excess of \$40 million to the City of Opa-locka which has made the national headlines. Using CDBG Funding also as leverage for funded needed and not part of the State Revolving such as the renovation and rehabilitation of the Opa-locka Community Care and Resource Center. This will be the most ambitious and project of this magnitude in the City's 89 year old history.

Demographic Information

The major disparities facing this community (target area) are poverty levels, minority isolation, reduced educational opportunities, low employment rates and an unhealthy environment. The population of the City in 2013 was 15,967, an increase of 6.8% from the 2000 population of 14,951 US Census Bureau). Over the next 20 years, the population in Opa-locka is expected to grow 11% with an estimated population of 16,817 by 2030 (Shimberg Center, Florida Housing Data Clearinghouse, 2013).

Table 1. Demographic Information	City of Opa-locka	County	State	National
Population	15,219	2,496,435	18,801,310	308,745,538

Population born outside of the United States	34.3%	51.2%	19.3%	12.9%
Poverty Rate	31.85%	27.30%	13.80%	13.80%
Percent Minority	72.3%	26.2%	25%	27.6%
Median Household Income	\$20,379	\$44,299	\$47,661	\$51,914
Percent Not in Workforce	48.5%	37.1%	39.3%	35.3%
Families below Poverty Level	37.6%	15.7%	11.4%	10.9%
Persons under 5	9.3%	5.9%	5.7%	6.3%
Female Head of Household with Children under 18	24.5%	9%	7.1%	7.2%
65 Years+ Below Poverty Level	40.0%	21.7%	10.1%	9.4%
Unemployment	13.51%	8.9%	8.9%	7.9%
Food Stamps Benefits	48.2%	20.2%	11.7%	11.4%
High School Graduate or Higher	60.4%	78%	85.8%	85.7%
Language other than English spoken at home	45.9%	72.3%	27.3%	20.5%

2008-2013 American Community Survey, 5-Year Estimates; available at <http://factfinder2census.gov>.

The population is culturally diverse with the percentage of foreign-born individuals at a rate of almost three times the national percentage. The minority population is about three times greater than the county, state, and national average. The major racial groups in the community consist of African American (64.2%), Hispanic (36.16%), and Caucasian (23%). Within this multi-cultural community, subgroups include Cubans (34.53%), Puerto Ricans (11.67%), and other Hispanic or Latino groups representing Dominican Republic, Central and South America, West Indies and Spain (35.67%).