Form
100-326
01-12-22

Greater Cleveland Regional Transit Authority
**STAFF SUMMARY AND COMMENTS**

| TITLE/DESCRIPTION: | Resolution No.: 2026-12 |
|---|---|
| APPROVING THE 2026 TITLE VI PROGRAM UPDATE FOR SUBMISSION TO THE FEDERAL TRANSIT ADMINISTRATION | Date: January 15, 2026 |
| | Initiator: Administration & External Affairs/Office of Equal Opportunity |

ACTION REQUEST:

☒ Approval ☐ Review/Comment ☐ Information Only ☐ Other _____

1.0 PURPOSE/SCOPE: This action will approve the 2026 Title VI Program Update for submission to the Federal Transit Administration ("FTA"), as required by Title VI of the Civil Rights Act of 1964.

2.0 DESCRIPTION/JUSTIFICATION: Every three years, the GCRTA staff prepares a Title VI Program Update and submits it to FTA. GCRTA's current Title VI Program expires in March 2026. The 2026 Title VI Program Update is due to FTA by February 1, 2026.

FTA Circular 4702.1B requires each Title VI Program Update to be reviewed and approved by the transit agency's governing body before it is submitted to FTA. Accordingly, staff is requesting a resolution from the Board of Trustees indicating that the Board has reviewed and approved the 2026 Title VI Program Update to be submitted to FTA.

3.0 PROCUREMENT BACKGROUND: Does not apply.

4.0 DBE/AFFIRMATIVE ACTION BACKGROUND: Does not apply.

5.0 POLICY IMPACT: Adoption of the resolution will enable GCRTA to comply with federal guidelines implementing Title VI of the Civil Rights Act of 1964.

6.0 ECONOMIC IMPACT: Failure to adopt the resolution may result in a finding by FTA of non-compliance with FTA Circular 4702.1B and the imposition of sanctions, including a refusal by FTA to approve grants.

7.0 ALTERNATIVES: Not adopting the resolution would impact and delay the approval of federal grants.

8.0 RECOMMENDATION: On January 6, 2026, the Operational Planning & Infrastructure Committee reviewed and discussed the 2026 Title VI Program Update and referred it to the full Board. It is recommended that the resolution be approved, authorizing the General Manager, Chief Executive Officer, and Chief Civil Rights Officer to submit the 2026 Title VI Program Update to the FTA.

Recommended and certified as appropriate to the availability of funds, legal form, and conformance with the Procurement requirements.

General Manager, Chief Executive Officer

RESOLUTION NO. 2026-12

APPROVING THE 2026 TITLE VI PROGRAM UPDATE FOR SUBMITTAL TO THE FEDERAL TRANSIT ADMINISTRATION

WHEREAS, the Board of Trustees has been granted the power and authority, pursuant to Chapter 306 of the Ohio Revised Code, to manage and conduct the affairs of the Greater Cleveland Regional Transit Authority ("GCRTA"); and

WHEREAS, Title VI of the Civil Rights Act of 1964 requires GCRTA and all recipients of federal financial assistance to operate their programs and services in a nondiscriminatory manner without regard to race, color, or national origin; and

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

WHEREAS, as outlined in the Circular, the GCRTA Board of Trustees is required to review and approve a Title VI Program Update for submittal to FTA every three years; and

WHEREAS, the draft Title VI Program Update was provided to all GCRTA Board members on January 15, 2026; and

WHEREAS, on January 6, 2026, GCRTA's Operational Planning & Infrastructure Committee considered the draft Title VI Program Update and recommended it to the full Board of Trustees.

NOW, THEREFORE, BE IT RESOLVED by the Board of Trustees of the Greater Cleveland Regional Transit Authority, Cuyahoga County, Ohio:

Section 1. That the 2026 Title VI Program Update, which is substantially in the form of the attachment hereto, has been reviewed and is approved.

Section 2. That the General Manager, Chief Executive Officer and Chief Civil Rights Officer is hereby authorized to submit the update to FTA.

Section 3. That this resolution shall be effective immediately upon its adoption.

Attachment: 2026 Title VI Program Update

Adopted: January 20, 2026

President

Attest:
Secretary-Treasurer

# 2026 TITLE VI PROGRAM UPDATE




Information Submitted by:

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# Chapter 1: INTRODUCTION

The U.S. Department of Transportation, Federal Transit Administration (FTA), has implemented guidelines governing applicants, recipients, and subrecipients of federal assistance regarding Title VI of the Civil Rights Act of 1964. Specifically, these requirements dictate that the Greater Cleveland Regional Transit Authority (hereinafter the Authority or GCRTA) must ensure that no person, on the grounds of race, color, or national origin, be excluded from participation in, be denied benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

GCRTA is committed to providing equal opportunity for employees, vendors, and customers, and to complying with all applicable federal and state laws, rules, and regulations of the treatment of minorities, women, individuals with disabilities, and veterans in all facets of the Authority's activities. GCRTA is equally committed to:

- Ensuring any federally funded transit-related benefits and services are made available and are equitably distributed without regard to race, color, or national origin.
- Ensuring that the level and quality of transit services provide equal access and mobility for any person without regard to race, color, or national origin.
- Ensuring that opportunities to participate in the transit planning and decision-making processes are provided to people without regard to race, color, or national origin.
- Ensuring that decisions on the location of transit services and facilities are made without regard to race, color, or national origin.
- Ensuring that corrective and remedial action is taken to prevent discriminatory treatment of any beneficiary based on race, color, or national origin.

The U.S. Department of Transportation, FTA, Region V, received the Authority's 2023 Title VI Program Update. The 2023 Title VI Program expires on March 1, 2026 and the 2026 Title VI Update is due on February 1, 2026. These Program Updates must comply with the requirements outlined in Circular 4702.1B, dated October 1, 2012.

## What Is Title VI?

Title VI was enacted as part of the Civil Rights Act of 1964.

> ***"No person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance."***
>
> ***-Civil Rights Act of 1964***

FTA Circular 4702.1B provides guidance and instructions for ensuring that the level and quality of public transportation service is provided in a nondiscriminatory manner; promoting full and fair participation in public transportation decision-making without regard to race, color, or national origin; and ensuring meaningful access to transit-related programs and activities by persons with limited English proficiency.

## What Does This Mean For GCRTA?

GCRTA, as a recipient of federal financial assistance through the Federal Transit Administration (FTA), is required to prepare a Title VI program update every three years.

GCRTA will ensure full compliance with Title VI of the Civil Rights Act of 1964, as amended, and related statutes and regulations in all GCRTA programs and activities. Regarding Title VI, GCRTA is equally committed to ensuring that:

- The benefits of its bus and rail services are shared equitably throughout the service area.
- The level and quality of bus and rail services are sufficient to provide equal access to all riders in its service area.
- No one is precluded from participating in GCRTA's service planning and development process.
- Decisions regarding service changes or facility locations are made without regard to race, color, or national origin, and that development and urban renewal plans benefit the community.
- A program is in place for correcting any discrimination under Title VI.

## Who Is Responsible for Ensuring Title VI Is Implemented?

The Board of Trustees, General Manager, Chief Civil Rights Officer, management, and all employees share the responsibility for carrying out GCRTA's commitment to Title VI.

The Senior Manager of OEO, ADA, and Organizational Culture is responsible for the day-to-day operation of the program as it relates to complaints and coordinating efforts. The Senior Manager of OEO, ADA, and Organizational Culture works with a Title VI team to ensure equal protection of the law as it relates to services and programs provided by GCRTA.

The current Title VI Team consists of the following:

- Felicia Brooks-Williams, Senior Manager, OEO, ADA, and Organizational Culture
- Joel Freilich, Director of Service Management
- Sharon Jenkins, Director of Marketing & Communications
- Maribeth Feke, Director of Programming & Planning

To ensure that GCRTA continues to comply with all the requirements outlined in Circular 4702.1B, the Senior Manager of OEO, ADA, and Organizational Culture will report quarterly to the Civil Rights (CR) Committee. The CR Committee provides an opportunity to update the GM and Executive Team on all civil rights functions. The Senior Manager of OEO, ADA, and Organizational Culture provides an update on Title VI, Title VII, and the ADA. In addition, the GM receives updates on Disadvantaged Business Enterprise (DBE)*, Human Resources (HR) Recruitment and Training efforts, and legal matters. The agenda includes formal and informal personnel practices to ensure equal treatment; making recommendations to the GM for modifications of GCRTA's policies and practices to enhance equal opportunity efforts; reviewing quarterly department/division reports on goals and timetables and recommending approval; and reporting on Title VI Updates.

The GCRTA Board of Trustees must also approve GCRTA's Title VI program before it submits it to FTA.

*Currently, the DBE program is being updated by federal regulations and GCRTA is not setting DBE goals on contracts. Updates will continue to be provided to the CR Committee as more guidance is released on the DBE program.

# Chapter 2: THE GENERAL REQUIREMENTS

FTA requires that a Title VI Program be submitted in accordance with the FTA as part of its Title VI Program.

The General Requirements section of this update contains Title VI Program components required by FTA Circular 4702.1B. This section includes the following information:

1. Title VI Public Notice
2. Title VI Complaint Procedures
3. Title VI Complaint Form
4. List of Transit-Related Title VI Investigations, Complaints, and Lawsuits
5. Meaningful Access to Limited English Proficient (LEP) Persons
6. Public Participation Plan
7. Title VI Compliance for Subrecipients
8. Participation in Non-Elected Committees and Councils
9. Determination of Site or Location of Facilities

## Title VI Public Notice

In accordance with Title VI, GCRTA displays a public notice to inform customers of their rights under Title VI. The notice is posted on GCRTA's website, RideRTA.com. The notice is also displayed in all GCRTA's transit vehicles (buses and rail cars), and transit facilities, such as the main office customer service area and transit stations.

See Chapter 4, Attachment A for the Title VI signage in both English and Spanish.

## Title VI Complaint Procedures

This section outlines GCRTA's Title VI complaint procedures related to providing programs, services, and benefits. However, it does not deny the complainant the right to file formal complaints with the Ohio Civil Rights Commission, and/or the FTA's Office of Civil Rights. These complaint procedures also do not prohibit a complainant from seeking private legal counsel for complaints alleging discrimination, intimidation, or retaliation of any kind that are prohibited by law.

GCRTA's complaint procedures are set forth below:

**General**

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination based on race, color, or national origin as noted below may file a written complaint with the Greater Cleveland Regional Transit Authority's Office of Equal Opportunity, 1240 W. 6th Street, 6th Floor, Cleveland, Ohio 44113. Complainants have the right to complain directly to the appropriate federal or state agency. Every effort will be made to obtain an early resolution of complaints. The option of informal meeting(s) between the affected parties and the Senior Manager of OEO, ADA, and Organizational Culture, or and OEO Specialist may be utilized for resolutions. The Senior Manager of OEO, ADA, and Organizational Culture will notify the Chief Civil Rights Officer of all the Title VI complaints and resolutions.

Procedure

1. The complaint must meet the following requirements:
    a. Be in writing and signed by the complainant(s). In cases where the Complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The Senior Manager of OEO, ADA, and Organizational Culture, or OEO Designee will interview the

Complainant and assist the person in converting verbal complaints into writing. All complaints must, however, be signed by the Complainant or his/her representative.
    b. Include the date of the alleged act of discrimination, the date when the Complainant became aware of the alleged act of discrimination, or the date on which that conduct was discontinued or the latest instance of conduct.
    c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties to the complaint.
    d. Federal and state law requires complaints to be filed within 180 calendar days of the alleged incident.
2. Upon receipt of the complaint, the Senior Manager of OEO, ADA, and Organizational Culture, or OEO Designee will determine its jurisdiction, acceptability, and need for additional information, as well as investigate the merits of the complaint.
3. The Complainant will be provided with a written acknowledgement that GCRTA has either accepted or rejected the complaint.
4. A complaint must meet the following criteria for acceptance:
    a. The allegation must involve a covered basis such as race, color, national origin, age, sex, religion, or disability.
    b. The allegation must involve a service provided by GCRTA, sub-recipient, or contractor.
5. A complaint may be dismissed for the following reasons:
    a. The Complainant requests the withdrawal of the complaint.
    b. The Complainant fails to respond to repeated requests for additional information needed to process the complaint.
    c. The Complainant cannot be located after reasonable attempts.
6. Once GCRTA's Office of Equal Opportunity decides to accept the complaint for investigation, the Complainant will be notified in writing of such determination. The complaint will receive a case number and will then be logged in a database identifying the Complainant's name, basis, alleged harm, race, color, and national origin.
7. In cases where GCRTA's Office of Equal Opportunity assumes the investigation of the complaint, within 90 calendar days of the acceptance of the complaint, the Senior Manager of OEO, ADA, and Organizational Culture will prepare an investigative report for the file. The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.
8. The Senior Manager of OEO, ADA, and Organizational Culture will decide on the disposition of the complaint. Dispositions will be stated as follows:
    a. In the event GCRTA is in noncompliance with Title VI regulations or there is enough evidence to substantiate the allegation, a stakeholders' meeting is conducted. A stakeholders meeting includes all the managers and executives that may be involved in a resolution or disciplinary action.
9. Notice of the Senior Manager of OEO, ADA and Organizational Culture determination will be mailed to the Complainant. Notice shall include information regarding appeal rights of Complainant and instructions for initiating such appeal. Notice of appeals are as follows:
    a. GCRTA will reconsider the determination if new facts come to light.
    b. If the Complainant is dissatisfied with the determination and/or resolution set forth by GCRTA, the same complaint may be submitted to the FTA for investigation. Complainants will be advised to contact the:
    Office of Civil Rights,
    Federal Transit Administration,
    1200 New Jersey Avenue, SE,
    Washington, DC 20590,
    **Phone:** 888-446-4511
10. A copy of the complaint and GCRTA's investigation report/letter of finding and Final Remedial Action Plan, if appropriate, will be issued to FTA within 120 days of the receipt of the complaint.
11. A summary of the complaint and its resolution will be included as part of the Title VI updates to the FTA.

### Recordkeeping Requirement

The Senior Manager of OEO, ADA, and Organizational Culture will ensure that all records relating to GCRTA's Title VI Complaint Process are maintained within the Office of Equal Opportunity. Records will be available for compliance review audits.

**Title VI Complaint Form**

# Greater Cleveland Regional Transit Authority

## Civil Rights Complaint Form

GCRTA is committed to ensuring that no person is excluded from participation in or denied the benefits of its services based on race, color or nation origin, disability, age, religion, gender, and veteran status. All complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require assistance in completing this form, please contact the Office of Equal Opportunity by calling (216) 356-3085. The completed form must be returned to: GCRTA Office of Equal Opportunity, ADA & Organizational Culture, Senior Manager of Office of Equal Opportunity, 1240 West Sixth Street, Cleveland, OH 44113-1302.

**Section I:**

Today's Date: _____

| | |
|---|---|
| Your Name: | |
| Home Address: | |
| City, State & Zip Code: | |
| Telephone No.: | Email Address: |

Accessible Format Requirements? ❑ Large Print ❑ Audio Tape ❑ Braille ❑ TDD ❑ Other

**Section II:**

Law prohibits discrimination based on the categories shown below. Check those categories, which you feel apply to the discrimination you experienced.

| | | |
|---|---|---|
| ❑ | Age ……. | Age 40 or over |
| ❑ | Color……. | Color of skin, including shade of skin within group |
| ❑ | Disability …… | Physical or mental disability |
| ❑ | Sex ……..…… | Male or female, masculine or feminine, gender identity and pregnancy |
| ❑ | National Origin ……. | National birth site – may also include person's language, accent, or race |
| ❑ | Race ……... | Belonging to a GCRTA in race or because of GCRTA in characteristics associated with race |
| ❑ | Religion ……. | Religious/Spiritual beliefs |
| ❑ | Retaliation ……. | Retaliation **for filing a discrimination complaint** or for opposing illegal discriminatory practices |
| ❑ | Sexual Harassment. | Unsolicited and/or unwelcome sexual advances, requests for sexual favors and other verbal or physical harassment of a sexual nature |
| ❑ | Sexual Orientation.... | Perceived by others to be in or identified with heterosexuality, homosexuality, bisexuality, etc. |
| ❑ | Veteran Status ……. | Service in the Armed Forces |

**Section III:**

| | |
|---|---|
| Name of the person(s) responsible for the harm you feel you suffered: | Job Title(s) and/or ID Number: |
| Location(s) of the occurrence(s): | Route No. and/or Bus No.: |
| Date(s) and time(s) of the occurrence(s): | Direction: Eastbound or Westbound |
| Brief description of the person(s) (i.e. gender, race, height, etc.): | |

**Section IV:**

What type of harm or discriminatory action was taken against you?

❑ Accommodation ❑ Hostile environment ❑ Service ❑ Other

If "Other," please specify:

_____

_____

_____

**Section VI:**

Describe the harm you feel you suffered and how the person(s) you named above are responsible.

_____

_____

_____

_____

_____

_____

_____

Did anyone witness the harm or discrimination you suffered? ❑ No ❑ Yes

If "Yes," please indicate who and what they witnessed.

_____

_____

**Section VI:**

What remedy would you like GCRTA to consider?

_____

_____

**Section VII:**

Have you filed this complaint with any other federal, state, or local agency or with any federal or state court?

❑ No ❑ Yes

If yes, please provide the contact information at the agency/court where the complaint was filed.

| | |
|---|---|
| Agency: | Contact Name: |
| Address: | Telephone Number: |
| City, State & Zip Code: | |

Have you previously filed a Title VI complaint with GCRTA? ❑ No ❑ Yes

If yes, please describe the complaint.

_____

_____

_____

**Please attach any written material or other information that you think is relevant to your complaint.**

I affirm that the information contained in this document is true and accurate to the best of my knowledge, information and belief.

Complainant's Signature: _____ Date: _____

Please mail this form to:

GCRTA Office of Equal Opportunity
Senior Manager of the Office of Equal Opportunity
1240 West 6th Street
Cleveland, Ohio 44113-1302

## List of Transit-Related Title VI Investigations, Complaints, and Lawsuits

GCRTA maintains a list of active investigations conducted internally by the Office of Equal Opportunity or externally by FTA and entitles other than FTA, including lawsuits and complaints that alleged discrimination based on race, color, or national origin. This list includes the date that the transit-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by GCRTA in response, or final findings related to the investigation, lawsuit, or complaint. There were no transit-related Title VI lawsuits filed against GCRTA from 2023-2025..

Please see the attached list of internal and external complaints from 2023 – 2025 that included Title VI allegations. The list of complaints covers the three years prior to 2026:

## Title VI Complaints 2023-2025

| Claim Number | Regarding | Date Complaint Received | Allegation(s) | Current Status/ Disposition | Other Detail | Date Resolved/ Closed |
|---|---|---|---|---|---|---|
| 2023-05-01 | Customer Complaint | 4/27/2023 | Discrimination based on national origin | Unsubstantiated | Closed | 6/6/2023 |
| 2024-10-05 | Customer Complaint | 10/29/2024 | Age, color, sex, race, and retaliation discrimination | Unsubstantiated | Closed | 11/22/2024 |
| 2024-12-01 | Customer Complaint | 12/9/2024 | Discrimination for disability, sex, race, and sexual harassment | Closed | Lack of information | 12/22/2024 |
| 2025-06-05 | Customer Complaint | 6/24/2025 | Gender, age, and race discrimination | Unsubstantiated | Closed | 7/9/2025 |

| Title VI External Complaints 2023-2025 | | | |
|---|---|---|---|
| **Agency** | **Claims Number** | **Allegation** | **Disposition** |
| OCRC | TOLG4(48848)05102023 | Disability, Age, Race Discrimination | Dismissed |
| OCRC | CLEG4(006579)04232024 | Race and Age Discrimination and Retaliation | Dismissed |
| OCRC | CLEG4(006718)05012024 | Race, Age, Sex, National Origin, Retaliation, and Disability Discrimination | Administratively Closed and Dismissed |
| OCRC | CLEG4(009489)09302024 | Race, Sex, Religion, and Retaliation | Dismissed |

## Meaningful Access to LEP Persons - Language Assistance Plan

GCRTA's Limited English Proficiency (LEP) Plan has been prepared to address the responsibilities that GCRTA has as a recipient of federal financial assistance as they relate to the needs of national-origin minority individuals with limited English proficiency language skills. The LEP Plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations, which state that no person shall be subjected to discrimination based on race, color, or national origin.

As a federal funding recipient from FTA, GCRTA is required to take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of GCRTA's programs and activities for LEP individuals. GCRTA has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with Limited English Proficiency (LEP) who wish to access services. LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. This LEP Plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available. The LEP Plan follows the four-factor framework outlined in the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons, 70 Fed. Reg. 74087-74100 (Dec. 14, 2005).

**Four Factor Analysis**

### 1.0 FACTOR 1 – THE NUMBER OR PROPORTION OF LEP INDIVIDUALS ELIGIBLE TO BE SERVED OR LIKELY TO BE ENCOUNTERED BY A GCRTA PROGRAM, ACTIVITY, OR SERVICE

GCRTA staff interaction with customers of LEP varies depending on department and function of the employee. The following have been identified as the most probable locations:

- Customer Call Center (Community Connection Line)
- Paratransit Reservation Center
- Paratransit Customer Registration (Disabled/Senior Transportation)
- Transit Police
- Public meetings
- Hiring events
- GCRTA's buses, trains, paratransit service, and transit stations.

### 1.1 Census Data

Data from the U.S. Census Bureau American Community Survey (ACS) identifies English language proficiency of people based on the language spoken at home.

Table A compares the percent of the population who speak English less than very well (qualified as LEP) across different geographies and time periods. Cuyahoga County is the GCRTA service area, the data for the state of Ohio and United States is included for comparison.

**Table A: Population that Speaks English less than "Very Well"**

| Percent of Population 5 Years or Older | | | | |
|---|---|---|---|---|
| **Speaks English Less than Very Well** | **2000** | **2010** | **2020** | **2023** |
| United States | 8.10% | 8.70% | 8.20% | 8.40% |
| Ohio | 2.20% | 2.30% | 2.50% | 2.80% |
| Cuyahoga County | 3.20% | 4.10% | 4.30% | 4.30% |

*Data Source: DP02, 2023: ACS 5-Year Estimates*

Within Cuyahoga County, 4.3% of the population reported having less than “very well” English speaking ability, qualifying them as LEP. This is GCRTA’s service area boundary and includes 59 municipalities.

The LEP population that speaks English as a second language in Cuyahoga County represent a variety of language groups.

### *1.1.1 Cuyahoga County Overview*

GCRTA provides transit service throughout Cuyahoga County. According to the 2019-2023 ACS 5-Year Estimates, Cuyahoga County’s population 5 years or older is 1,181,236. Of that, 12.35% speak a language other than English and 4.34% speak English less than “very well.” Table B gives an overview of the language groups spoken at home in the GCRTA service area and Table C displays the percentage change in LEP populations since the last Title VI reporting period.

**Table B: Cuyahoga County Population Language Demographics**

| Cuyahoga County, Ohio 2019-2023 ACS 5-Year Estimates | | |
|---|---|---|
| | Total | Percent |
| **Population 5 years and over** | 1,181,236 | |
| **English only** | 1,035,403 | 87.65% |
| **Language other than English** | 145,833 | 12.35% |
| Speak English less than “very well” | 51,239 | 4.34% |
| **Spanish** | 52,900 | 4.48% |
| Speak English less than “very well” | 18,849 | 1.60% |
| **Other Indo-European Languages** | 51,691 | 4.38% |

| | | |
|---|---|---|
| Speak English less than "very well" | 17,964 | 1.52% |
| **Asian and Pacific Islander Languages** | 20,323 | 1.72% |
| Speak English less than "very well" | 7,825 | 0.66% |
| **Other Languages** | 20,919 | 1.77% |
| Speak English less than "very well" | 6,601 | 0.56% |

*Data Source: DP02, 2023: ACS 5-Year Estimates*

**Table C: Cuyahoga County Change in LEP Individuals**

| **Cuyahoga County, Ohio 2019 -2023 ACS 5-Year Estimates** | | | **Cuyahoga County, 2016-2020 ACS** | | **Percent Change** |
|---|---|---|---|---|---|
| | Total | Percent | Total | Percent | |
| **Population 5 years and over** | 1181236 | | 1170634 | | 0.9% |
| **English only** | 1035403 | 87.7% | 1028266 | 87.8% | 0.7% |
| **Language other than English** | 145833 | 12.3% | 142368 | 12.2% | 2.4% |
| Speak English less than "very well" | 51239 | 4.3% | 49,815 | 4.3% | 2.9% |
| **Spanish** | 52900 | 4.5% | 50,772 | 4.3% | 4.2% |
| Speak English less than "very well" | 18849 | 1.6% | 17,328 | 1.5% | 8.8% |
| **Other Indo-European languages** | 51691 | 4.4% | 52,318 | 4.5% | -1.2% |
| Speak English less than "very well" | 17964 | 1.5% | 17,938 | 1.5% | 0.1% |
| **Asian and Pacific Islander languages** | 20323 | 1.7% | 20,582 | 1.8% | -1.3% |
| Speak English less than "very well" | 7825 | 0.7% | 8,499 | 0.7% | -8% |
| **Other languages** | 20919 | 1.8% | 18,696 | 1.6% | 11.9% |
| Speak English less than "very well" | 6601 | 0.6% | 6,050 | 0.5% | 9.1% |

*Data Source: DP02, 2023: ACS 5-Year Estimates*

The population of Cuyahoga County has slightly increased, with non-English speaker population growth outpacing English-only speaker population growth. This has increased the number of individuals who speak English less than "very well," a metric that has grown more than general population and the general population that speaks a language other than English. The largest growth category is in the population of "Other languages" speakers who speak English less than "very well" (9.1%). The largest decrease was in the population of Asian language speakers who speak English less than "very well" (-8%).

**Table D: Population and Percent of LEP by Language**

| Cuyahoga County, Total Population = 1,181,236 | | | |
|---|---|---|---|
| Language | Estimated LEP Population | % of LEP Population | % of Total Population |
| Spanish | 18849 | 36.8% | 1.6% |
| Chinese | 3959 | 7.7% | 0.3% |
| French, Haitian, or Cajun | 1394 | 2.7% | 0.1% |
| German or other West Germanic languages | 891 | 1.7% | 0.1% |
| Russian, Polish, or other Slavic languages | 8106 | 15.8% | 0.7% |
| Other Indo-European languages | 7573 | 14.8% | 0.6% |
| Korean | 471 | 0.9% | 0.0% |
| Vietnamese | 907 | 1.8% | 0.1% |
| Tagalog | 776 | 1.5% | 0.1% |
| Other Asian and Asian Pacific languages | 1712 | 3.3% | 0.1% |
| Arabic | 4215 | 8.2% | 0.4% |
| Other and unspecified languages | 2386 | 4.7% | 0.2% |

*Data Source: C16001, 2023: ACS 5-Year Estimates*

### *1.1.2 Map Analysis*

Geographic locations for LEP individuals by language is shown on Figures 1 through 5, below. This highlights locations where LEP individuals might interact with the GCRTA system. ACS 2019-2023 5-Year estimates were used to produce these maps. This dataset is from an ongoing survey that provides vital information on individuals and households annually. 2023 ACS data is the most recent complete dataset. It is best practice to use 5-Year estimates for accuracy at the census tract level, as was used in this analysis. Maps have been created for the following language groups:

1. All LEP Speakers

2. Spanish Language LEP Speakers
3. Indo-European Language LEP Speakers
4. Asian Language LEP Speakers
5. Other Language LEP Speakers

**Spanish Speakers include:**

- Spanish or Spanish Creole

**Indo-European Speakers include:**

- French, including Patois, Cajun
- French, Creole
- Italian
- Portuguese or Portuguese Creole
- German
- Yiddish
- Other West Germanic languages
- Scandinavian Languages
- Greek
- Russian
- Polish
- Serbo-Croatian
- Other Slavic Languages
- Armenian
- Persian
- Gujarati
- Hindi
- Urdu
- Other Indo-European

Languages

**Asian Speakers include:**

- Chinese
- Japanese
- Korean
- Mon-Khmer

- Hmong
- Thai
- Laotian
- Vietnamese

Other Asian Languages

- Tagalog
- Other Pacific Island Languages

**Other Language Speakers include:**

- Navajo
- Other Native North American Languages
- Hungarian
- Arabic
- Hebrew
- African Languages
- Other Specified Languages

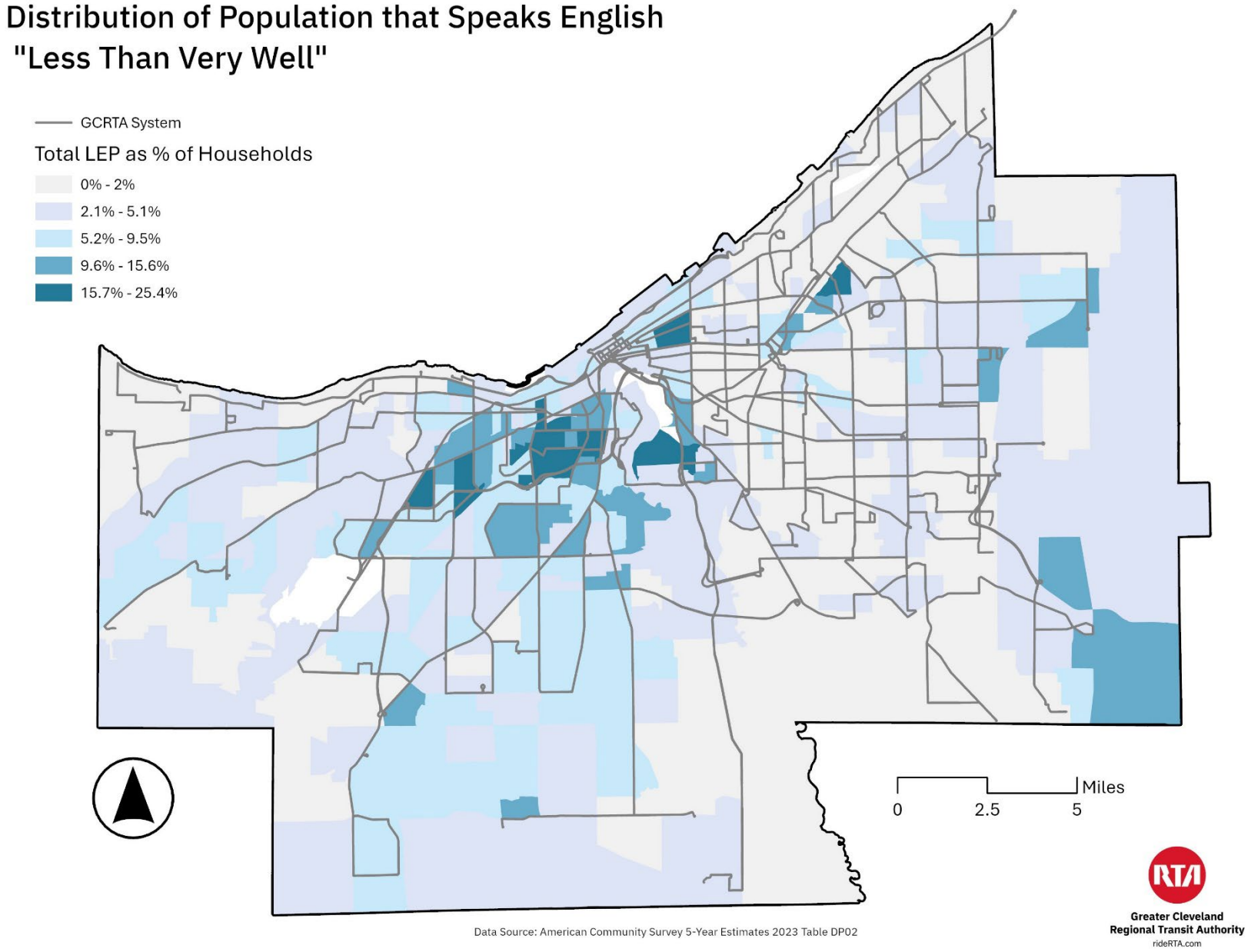
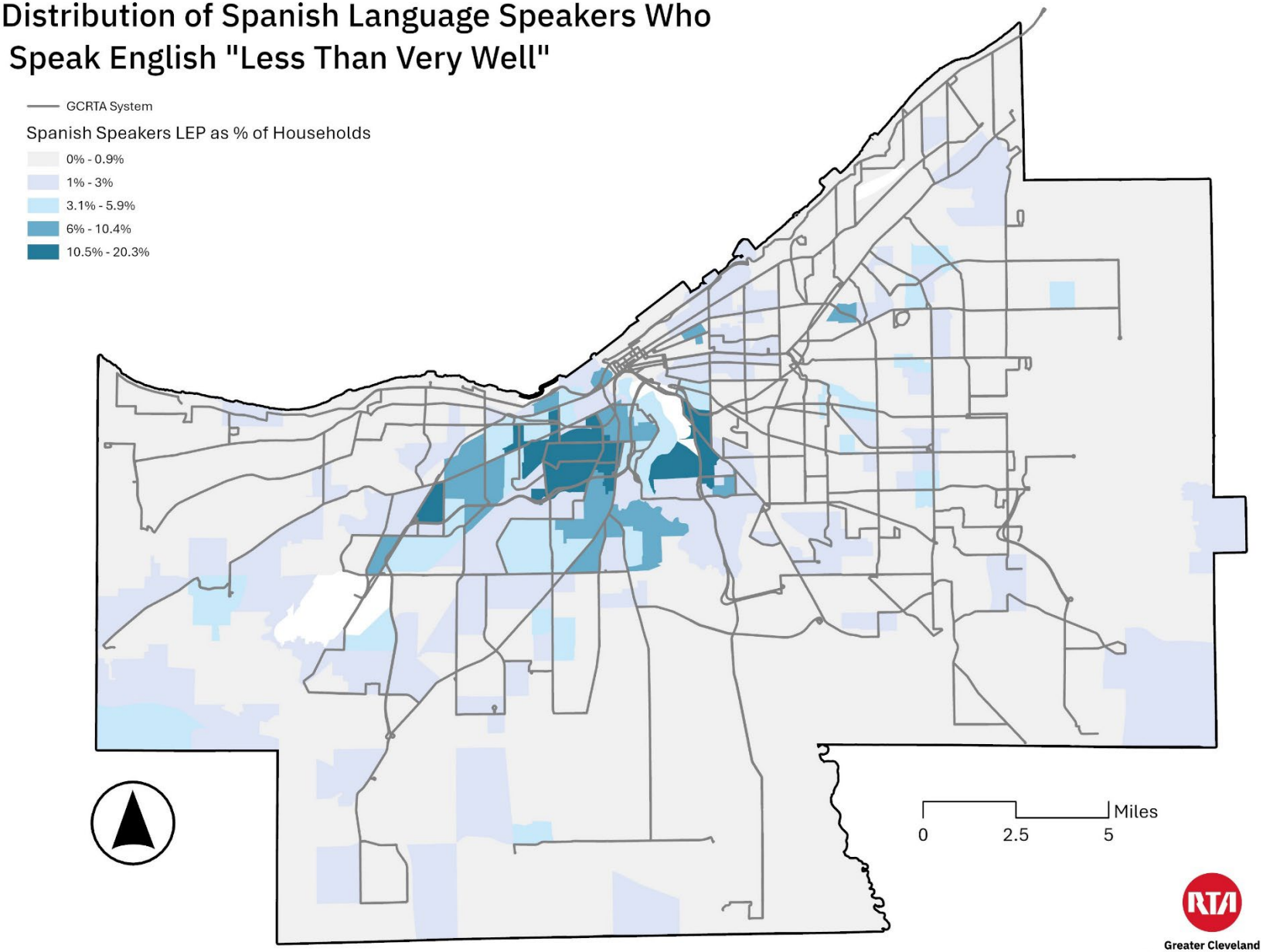

Distribution of Population that Speaks English
"Less Than Very Well"
GCRTA System
Total LEP as % of Households
0% - 2%
2.1% - 5.1%
5.2% - 9.5%
9.6% - 15.6%
15.7% - 25.4%
Miles
0
2.5
5
Data Source: American Community Survey 5-Year Estimates 2023 Table DP02
Greater Cleveland
Regional Transit Authority
rideRTA.com

**Figure 1**

Figure 2

# Distribution of Spanish Language Speakers Who Speak English "Less Than Very Well"

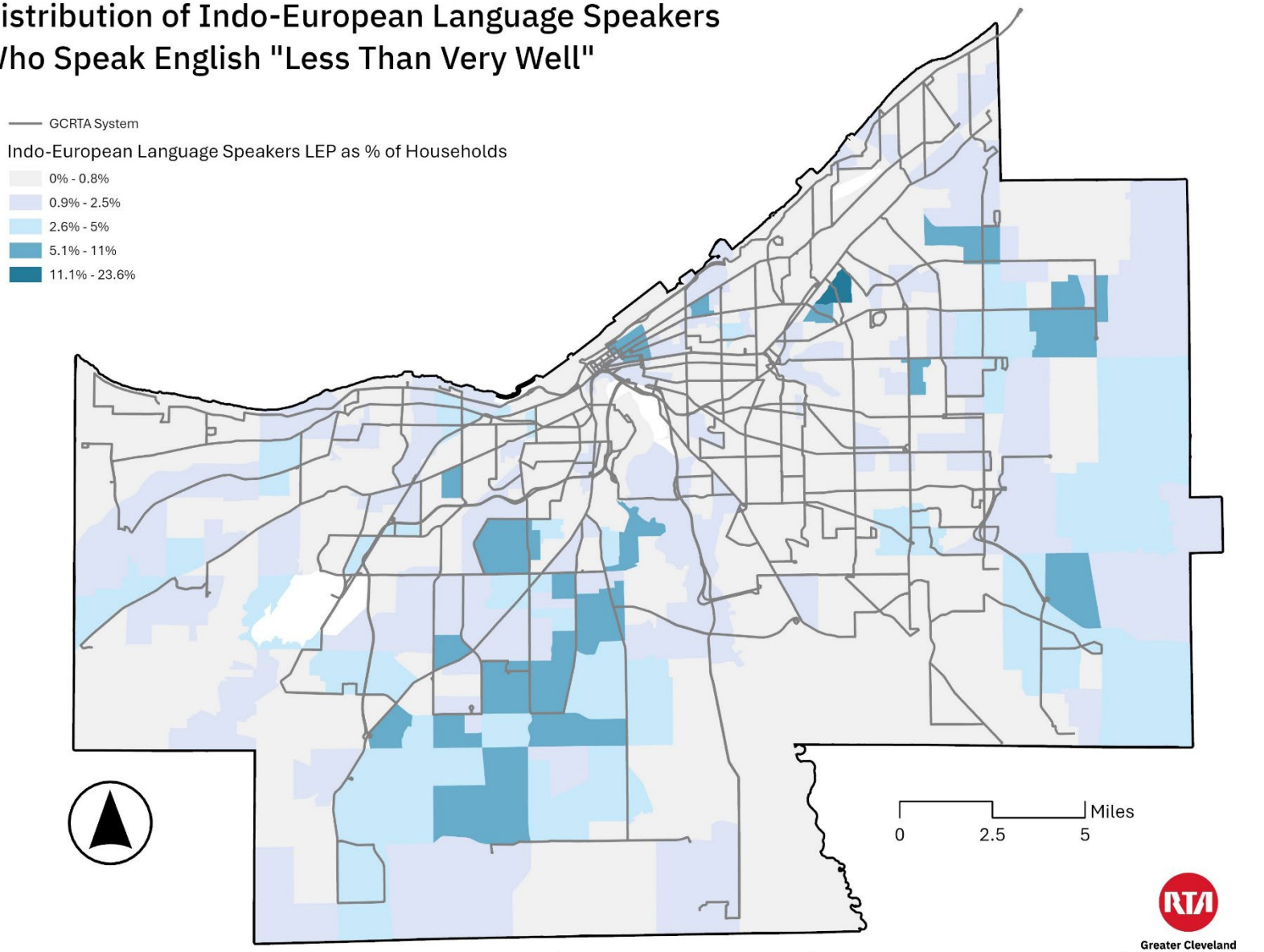



Data Source: American Community Survey 5-Year Estimates 2023 Table DP02

Greater Cleveland Regional Transit Authority
rideRTA.com

Figure 3

# Distribution of Indo-European Language Speakers Who Speak English "Less Than Very Well"




Data Source: American Community Survey 5-Year Estimates 2023 Table DP02

Greater Cleveland Regional Transit Authority
rideRTA.com

**Figure 4**

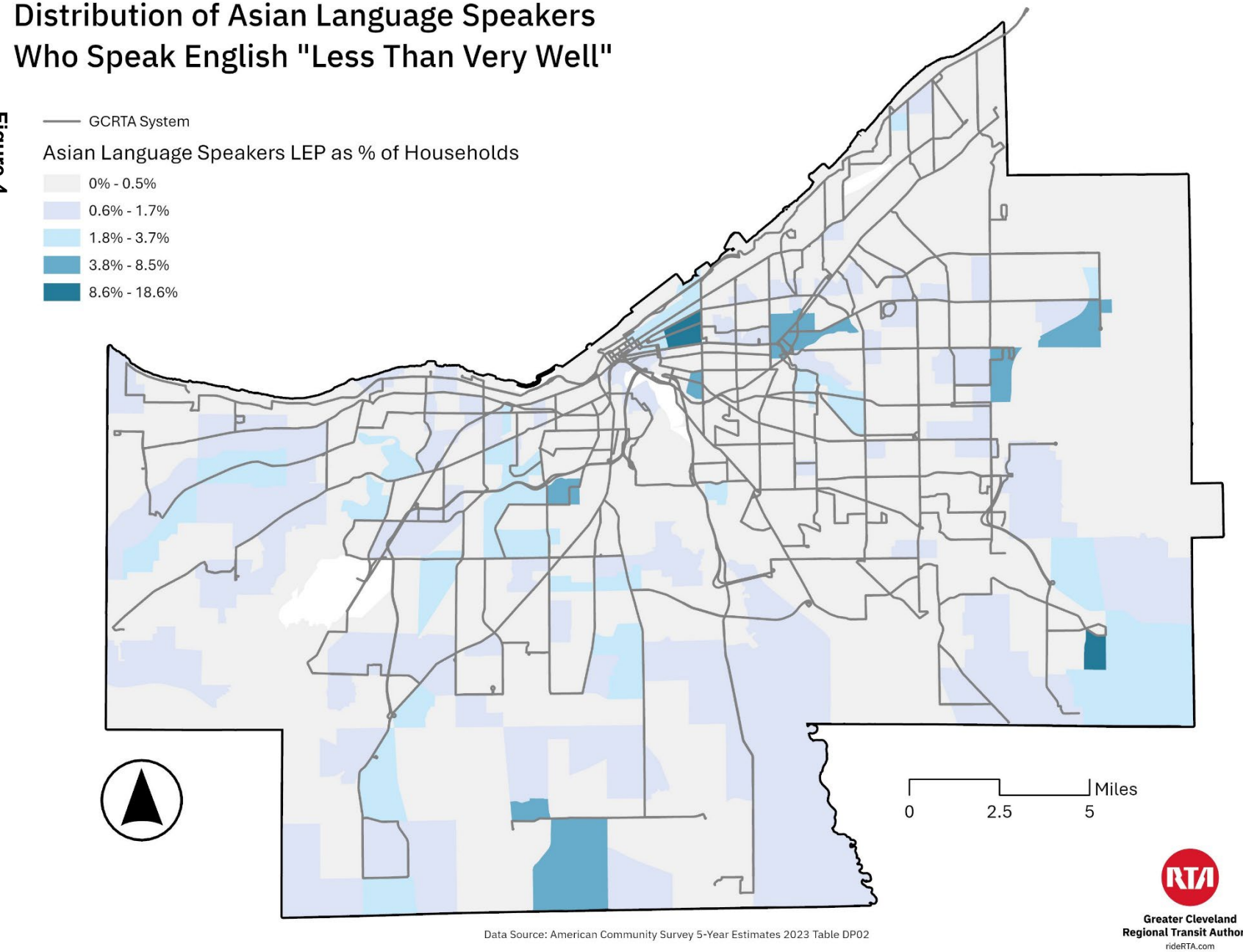
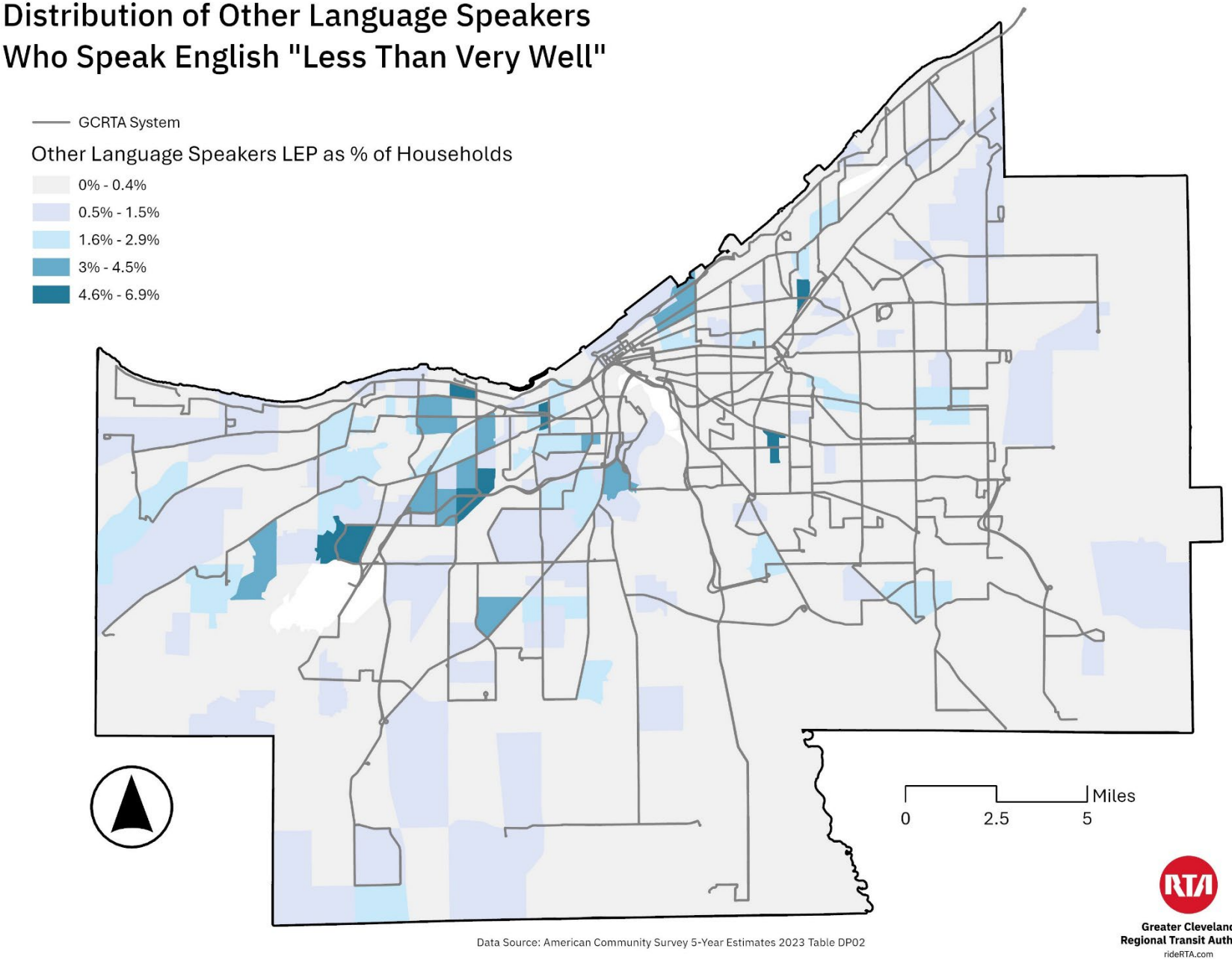

Distribution of Asian Language Speakers
Who Speak English "Less Than Very Well"
GCRTA System
Asian Language Speakers LEP as % of Households
0% - 0.5%
0.6% - 1.7%
1.8% - 3.7%
3.8% - 8.5%
8.6% - 18.6%
Miles
0
2.5
5
Data Source: American Community Survey 5-Year Estimates 2023 Table DP02
Greater Cleveland
Regional Transit Authority
rideRTA.com

**Figure 5**


Distribution of Other Language Speakers
Who Speak English "Less Than Very Well"
GCRTA System
Other Language Speakers LEP as % of Households
0% - 0.4%
0.5% - 1.5%
1.6% - 2.9%
3% - 4.5%
4.6% - 6.9%
Miles
0
2.5
5
Data Source: American Community Survey 5-Year Estimates 2023 Table DP02
Greater Cleveland
Regional Transit Authority
rideRTA.com

Summarizing the map information:

- The City of Cleveland is where the largest percentage of LEP individuals live in the GCRTA service area.
- There is a dense concentration of Spanish LEP Speakers on the west side of the City of Cleveland.
- Indo-European LEP Speakers have a high concentration in the southern portion of the County.
- Asian and Pacific Islander LEP Speakers are located throughout Cuyahoga County and represent a smaller % of the LEP population overall.
- “Other Language” LEPs are concentrated in the far-west side of the City of Cleveland and western suburbs.

## 2.0 FACTOR 2 – THE FREQUENCY WITH WHICH LEP PERSONS COME IN CONTACT WITH GCRTA PROGRAMS, ACTIVITIES OR SERVICES

GCRTA provides fixed route bus, rail, bus rapid transit, and demand response (Paratransit) services. Various facilities and vehicles provide these services, which requires GCRTA to have community interaction, including operator communication, dispatch services, transit police interaction, and ADA processing.

LEP encounters are not collected. However, GCRTA has several public outreach groups that may discuss events related to LEP individuals and determine possible solutions. These groups include the GCRTA Community Advisory Committee and the GCRTA ADA Council.

### 2.1 LEP Encounters

ACS 2023 datasets for workers aged 16 years and older provided data for travel to work by language proficiency. Table E displays these results. Overall, only 3.3% of the population use public transit as a means of transportation to work and 3.9% of the total working population 16 years or older speak English less than “very well”. The LEP population reports transit as their means of transportation to work at a higher rate than the general population, (3.3% vs. 4.10%).

**Table E: LEP populations means of transportation to work (16 years and older)**

| Label | Total | Car, truck, or van – rode alone | Car, truck or van – car-pooled | Public transportation (excluding taxicab) |
|---|---|---|---|---|
| | Estimate | Estimate | Estimate | Estimate |
| Workers 16 years and over | 593,409 | 71.7% | 7.2% | 3.3% |
| Speak language other than English | 74,176 | 12.1% | 19.6% | 11.2% |
| Speak English less than "very well" | 23,142 | 3.8% | 8.7% | 4.1% |

*Data Source: S0802, 2023: ACS 5-Year Estimates*

GCRTA has several key programs and major points of contact with the public that LEP individuals may use. The following describe customer service interactions and opportunities for LEP outreach.

### *2.1.1 Customer Call Center*

The GCRTA Customer Call Center (Community Connection Line) provides information for general callers on GCRTA services. It is located within the Main Office Building. The Call Center tracks requests for Spanish-speaking assistance. GCRTA has two bilingual representatives in the Call Center to help anyone who requires Spanish language assistance. The following identifies the number of calls requesting Spanish language over the last three years.

| Year | Number of Calls | Percentage |
|---|---|---|
| 2023 | 258 | .01 |
| 2024 | 313 | .02 |
| 2025 (to date) | 280 | .02 |

### *2.1.2 Paratransit Reservation Center*

The Paratransit reservation center does not track requests for assistance in arranging trips in other languages. The primary language barrier is Spanish, which is handled by a full-time Spanish-speaking reservationist. LEP individuals are not common, averaging four cases a month. The Paratransit reservation center is located at the Paratransit District Garage and not within the Main Office Building.

### *2.1.3 Paratransit Customer Registration (Disabled/Senior Transportation), ADA Office*

The Paratransit registration is located within the Main Office Building. It screens and registers individuals for reduced fares under GCRTA's Paratransit service program.

Assistance from the Call Center bilingual employees is needed roughly six to eight times a week.

### *2.1.4 Transit Police*

Transit Police officers occasionally interact with LEP individuals. In the event interpretation is needed, a Spanish-speaking Transit Police officer, Spanish-speaking GCRTA employee, or another Spanish-speaking first responder has been available to assist. Currently, there is also an officer fluent in German. In 2023, GCRTA added four Crisis Intervention Specialists to the Transit Police personnel. These employees are trained social workers and accompany Transit Police officers to assist GCRTA customers requiring special assistance. . The Crisis Intervention Specialists utilize tablets with internet access and are able to access online audio Google Translate services with language detection if needed. *2.1.5 Board Meetings and Public Meetings*

Public meetings are held in public areas to discuss service changes or development.

#### *2.1.5.1 Human Resources Hiring Events*

- In recent years, GCRTA has created a partnership with El Barrio – Workforce Development Center which is part of the Centers for Family and Children. Two or three times a year, GCRTA has an event at their facility to meet with clients and potential job applicants. These events give GCRTA the opportunity to speak to the Hispanic community about general areas of interest and provide information about employment opportunities. El Barrio provides training to their clients that are interested in becoming a Bus Operator at GCRTA, and how to obtain the temporary Commercial Driver's License (CDL) to begin the recruitment process at GCRTA.
- GCRTA also has a partnership with the Cleveland Spanish American Committee, where our Human Resources department meets with organization representatives to present on GCRTA's service and open job opportunities.
-

#### *2.1.5.2 Human Resources - CMSD Outreach*

- The Cleveland Metropolitan School District (CMSD) submitted a resolution agreement in November 2013 to the U.S. Department of Education's Office for Civil Rights that in part provided for CMSD to provide LEP students and their parents with information in a language they could understand on how to use public transportation to get to and from school, beginning in the 2014-2015 school year. CMSD worked with GCRTA to provide students with this training, and over time the program has grown. The students' grade levels range from K-12representing a variety of languages. GCRTA Outreach Sessions have been held at the following CMSD schools:

- Buhrer Dual Language Academy
- Clark
- Joseph M. Gallagher
- Luis Munoz Marin
- Scranton
- Thomas Jefferson International Newcomers Academy
- James Ford Rhodes
- Lincoln-West
- Max S. Hayes

- GCRTA literature was translated by CMSD Staff and was provided to students and parents. The literature and presentation focused on the following:
  - Bus & Rail Safe Riding Tips (Grade Crossing, Emergency Phone Use)
  - Safe Place Program
  - Transit Police App (Safe Watch)
  - How to use your fare card/planning your trip
  - Use Transit App/EZ Fare
  - What to expect your first time

2.1.6 *Office of Small Business*

The Office of Small Business participates in the Northeast Ohio Hispanic Chamber of Commerce (NEOHCC) Construction Opportunity Fair. This is an annual event which provides GCRTA an opportunity to highlight contracting opportunities. Translation services for required forms and documents are provided.

### 2.2 Other Local Government Agency Experiences

GCRTA monitors and learns from the City of Cleveland, Cuyahoga County, and CMSD experiences with LEP individuals. GCRTA will also reach out to the local planning departments in communities that have a cluster of LEP individuals for assistance on how to best communicate information to specific populations.

GCRTA participates in regional transit collaboration through the local metropolitan planning organization called NOACA (Northeast Ohio Areawide Coordinating Agency). This includes participation in Transit Council, which discusses topics related to transit services and funding. It is an opportunity to share best practices related to customer service and needs.

## 3.0 FACTOR 3 – THE NATURE AND IMPORTANCE OF PROGRAMS, ACTIVITIES, OR SERVICES PROVIDED BY GCRTA TO THE LEP POPULATION

GCRTA provides a wide array of transportation services from the regular fixed route system to Paratransit services. Making these services accessible to LEP persons

provides transportation choice and is a vital service for individuals without access to personal vehicles.

In addition to transit services, GCRTA provides service-related information at public meetings and board meetings, and LEP individuals interact with and are able to access transit police services and hiring events.

### 3.1 Consequences of Language Barriers

The critical services can be divided into three groupings for potential consequences: basic service usage; emergency procedures; and public hearings.

#### *3.1.1 Basic Service Usage*

LEP individuals could potentially not receive transportation services. It could be an inconvenience to LEP individuals until appropriate translation or assistance is provided. GCRTA provides Paratransit services, which serves customers that are unable to utilize typical fixed route service. Paratransit customers are ADA-certified residents, of which some may be LEP customers.

#### *3.1.2 Emergency Procedures*

For emergency procedures, it is feasible that there may be an occurrence where an LEP individual would need to evacuate a GCRTA vehicle or building for safety purposes or contact Transit Police for safety reasons. Recent updates to the safety evacuation signage on buses and trains provide most information pictorially, with limited usage of written instructions. Within GCRTA facilities, universal exit signage is utilized to direct all patrons out of the facility or to an area of safe refuge.

#### *3.1.3 Public Hearings*

LEP individuals may have the inability to understand and provide comment on proposed service changes or other issues. This may result in an unintentional under-representation of the impact to the greatest number of LEP persons within the limits of GCRTA's service area. GCRTA analyzes site locations for public hearings and may provide translation services where needed.

The MetroHealth Line Bus Rapid Transit (BRT) Project is located in an area of high Spanish-speaking population; thus, GCRTA community meetings in those neighborhoods have historically provided materials in both Spanish and English and included Spanish interpreters on-site.

## 4.0 FACTOR 4 -THE RESOURCES AVAILABLE TO GCRTA AND OVERALL COST TO PROVIDE LEP ASSISTANCE

### 4.1 Inventory of GCRTA Resources

GCRTA reviewed its available resources and the costs for providing LEP assistance, including verbal interpreter services and written translation.

#### *4.1.1 Language Assistance*

Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language, and/or translation, which means the written transfer of a message from one language into another language.

How GCRTA staff may identify an LEP person who needs language assistance:

- GCRTA plans to post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand. This notice is currently posted for Spanish language assistance.
- When GCRTA sponsors an informational meeting or event, a staff person may greet participants as they arrive. By informally engaging participants in conversation, it is possible to gauge each attendee's ability to speak and understand English. Although interpreter services may not be able to be provided at the event, it will help identify the need for interpreter services at future events.

### *4.1.2 Current Language Assistance Measures*

GCRTA staff take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.

The following resources will be available to accommodate LEP persons:

- Written language translation services are available and will be provided within a reasonable time period.
- Language interpretation will be accessed for all other languages through a telephone interpretation service. Although GCRTA's previous resource for providing these services is no longer available, GCRTA is researching and obtaining new resources to be able to provide needed telephone interpreter services.
- Language translation into Spanish, Chinese, Russian, and Arabic is available for text on much of GCRTA's website. GCRTA will be seeking to increase the number of available languages and the website content available for translation.
- 25Connects (funded by the FTA's Transit-Oriented Development Pilot Program, a strategic study to break down barriers along Cleveland's West 25th Street corridor to build transit-oriented development as well as a guidebook for future bus rapid transit (BRT) implementation)published materials in English and Spanish and hosted all meetings bi-lingually. The resulting MetroHealth BRT Project also included Spanish language interpreter and translation services at Community Meetings.
- GCRTA has all its vital documents translated into the Spanish language.

### *4.1.3 Printed Materials*

GCRTA currently has language translation available in four languages for much of its website content. Given Spanish is the most commonly spoken language in GCRTA's service area other than English, GCRTA provides translations of its vital documents in Spanish online. Those Vital Documents include:

- Complaint Form
- Complaint Process
- Notice of Your Rights -Title VI Signage
- Paratransit Application
- Paratransit Booklet

Concurrent with Title VI regulations, Title VI information and documentation is available at www.rideRTA.com and upon request. Any person who believes he or she has been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with GCRTA. Each transit vehicle displays signage (in both English and Spanish), informing passengers of their rights protected by Title VI.

#### *4.1.4 Monitoring*

The LEP Plan will be reviewed and updated periodically, or when higher concentrations of LEP individuals are present in the GCRTA service area. Updates will include the following:

- Current LEP population in the service area
- Changes in need for translation services
- Language assistance programs that have been effective and sufficient
- GCRTA financial resources available to fund language assistance resources needed
- GCRTA compliance with the goals of this LEP Plan
- Complaints received concerning LEP customers

## 4.2 Recent LEP Service Implementations

The following services identified have been implemented to assist the LEP population:

- Fixed Route Bus/Rail Schedules
- With the re-issuance of new schedules for each route, information is now translated in Spanish to direct LEP persons to call the Customer Service Center for additional help.
- Similar information directing Spanish-speaking LEP persons to call the Customer Service Center is now placed on the GCRTA website.
- Emergency Evacuation Procedures

- Updating all emergency evacuation instructions on GCRTA buses and trains with universal graphic signage. Text has been augmented or replaced with fully pictorial versions.
- Currently use the universal “EXIT” signs and no further action is required.
- GCRTA has continued to pursue hiring bilingual speakers, with a focus on language group(s) identified through continued outreach as potentially having a significant LEP population using transit.

## Public Participation Plan

It is the policy of GCRTA to encourage public involvement and participation in the decision-making process regarding issues impacting GCRTA’s customers, including but not limited to service reductions and fare modifications (Resolution No. 1995-25). GCRTA has established a public involvement process to ensure minority and LEP populations are engaged through public outreach and involvement activities.

The GCRTA Board of Trustees (Board) meets monthly. All meetings of the Board, except executive sessions held for purposes required or permitted by law, are open to the public and no person is excluded from any meeting. Time is provided for the public to comment on any issue at each meeting. GCRTA maintains a list of persons and organizations that wish to receive information from GCRTA.

**Summary of Outreach Activities Since Last Title VI Submission**

GCRTA solicits comments and customer feedback from interested parties related to major decisions impacting services and fares. Public comments and participation are solicited in several ways, including:

- Public Hearings and/or Community Meetings
- Letters written to GCRTA
- Comments received via the GCRTA website
- Social media: Facebook, Twitter, Instagram and LinkedIn
- GCRTA’s Community Advisory Committee
- Direct communications with elected officials and community leaders
- Emails to GCRTA’s public comment mailbox

Public Meetings

Public meetings are a critical element of GCRTA's community involvement program. Meetings are held with the primary objective of sharing information related to specific changes, as well as soliciting feedback from interested parties.

Typically, meetings are held in affected neighborhoods, allowing those audiences that may be impacted by proposed changes easy access to provide comment. Locations are easily accessible by public transportation and all facilities are ADA compliant.

Notification of meetings are posted at least two weeks in advance in media sources most consumed by individuals residing in affected service areas, such as the Cleveland Plain Dealer, and the Call and Post (weekly publication serving Northeast Ohio's African American community). Scheduled meetings are also promoted on/in GCRTA's customer communications (such as social media posts, emails, or newsletters as applicable), signage posted on revenue vehicles, audio announcements are aired in passenger facilities, and through postings in various media outlets.

The format of the meeting/hearing varies based on the audience and magnitude of the proposed change. In most cases, an "open-house" type meeting is held that spans several hours and is typically conducted in communities that may potentially be impacted by the proposed changes. The meeting begins with GCRTA staff providing a detailed description of the changes proposed, followed by a period of open comment from meeting attendees. Throughout the meeting, GCRTA staff are present to respond directly to customer inquiries and questions.

To better address the needs of those individuals with language barriers, Spanish-speaking staff members are present to provide interpreter services. Additionally, a court reporter is present to capture an accurate transcript of comments provided by attendees. These comments are later reviewed and interpreted by GCRTA's Service Planning staff and incorporated into the final recommendations prepared for GCRTA management's consideration.

### Consideration of Public Comment and Feedback

All comments received regarding proposed changes are reviewed and summarized by GCRTA staff including Marketing, Service Management, Office of Management & Budget, and Finance. After a general review is completed, GCRTA staff from affected departments share information received from the public, along with revised recommendations to GCRTA's General Manager/CEO, Deputy General Manager of Operations, and other key executive staff for final determination. The final recommendations take into full consideration comments received through the public involvement process. GCRTA staff is committed to faithfully representing all comments received, positive as well as negative, when presenting the results. Recommendations endorsed by the Executive Management team are presented to GCRTA's Board for final action or acceptance.

### Responsibilities

The Service Management Department and the Office of Management & Budget are responsible for the following:

- Develop proposals for consideration related to service modifications and fare increases
- Develop and implement the community involvement plan to solicit customer comments
- Review and summarize the comments
- Revise recommendations based on public comment and input
- Package final recommendations for approval by the Board of Trustees

The Marketing department is responsible for the following:

- Maintain all documentation related to the public participation process
- Placement of legal notices promoting public hearings at least two weeks prior to scheduled events.
- Development of other communication strategies to promote public meetings (signs, media releases, flyers)
- Compile and maintain the public comment file for all comments received through all sources (meetings, emails, letters)
- Coordinate use of digital media for both posting of information and collecting customer comments
- Determine the best format for the public meeting
- Make all arrangements for public meetings, including but not limited to, securing the meeting space, scheduling hearing and/or language interpreters and court reporters, and development and production of all collateral materials for the meeting
- Communicate with elected officials and community leaders in affected areas prior to meetings to review proposals and solicit comment

## Title VI Compliance for Subrecipients

At this time, GCRTA has no subrecipients.

## Participation in Non-Elected Committees and Councils

The Community Advisory Committee (CAC) is comprised of community representatives that reflect GCRTA's customer base. The CAC is a transit-related group of volunteers that meet quarterly to discuss relevant issues about the operations of GCRTA. The CAC is currently comprised of eleven (11) members and may have up to a maximum of fifteen

(15) members. CAC members work to increase citizens' participation in community activities and involve the public in transit-related decision-making.

| COMMUNITY ADVISORY COMMITTEE MEMBER COMPOSITION: RACE | |
|---|---|
| African American | 2 |
| White | 8 |
| Asian | 1 |
| **Total Members** | 11 |

## Determination of Site or Location of Facilities

In accordance with the FTA Circular 4702.1B, GCRTA is required to conduct a Title VI Equity Analysis of new facilities to ensure compliance with Title VI.

Attachment B contains the full Equity Analysis Report for 15583 Brookpark Rd. The report confirms that the relocation of the Rail Maintenance Facility to 15583 Brookpark Rd will not have any disparate impacts on groups protected by Title VI.

## Title VI Program Board Meeting Policy Decision Documentation

In accordance with the FTA Circular 4702.1B, the Title VI Update must include a copy of the Board meeting minutes, resolutions, and other appropriate documentation showing the Board reviewed and approved the Title VI Plan. This information is provided in Chapter 4: ATTACHMENTS and consists of:

- **Title VI Board Presentation**
- **Resolution No. 2026- ; Approving the 2026 Title VI Program Update**
- **Staff Summary & Comments: Approving the 2026 Title VI Program Update**
- **Board Meeting Minutes**

# Chapter 3: FIXED ROUTE TRANSIT PROVIDER REQUIREMENTS

This section contains Title VI Program components required by FTA Circular 4702.1B for fixed route transit providers.

Based on the size of GCRTA's service area and fixed route vehicle fleet, GCRTA is required to set system-wide standards and policies for each specific fixed route mode of service GCRTA provides, addressing how service is distributed across the transit system and ensuring that the manner of the distribution affords users access to these assets. This includes developing quantitative standards for all fixed route modes of operation for

the following indicators for each mode: vehicle load; vehicle headway; on-time performance; and service availability. GCRTA is also required to adopt system-wide service policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin. This includes developing a policy for the following service indicators for each mode: distribution of transit amenities; and vehicle assignment.

GCRTA is also required to collect and analyze racial and ethnic data including demographic and service profile maps and charts and demographic ridership and travel patterns. GCRTA must also monitor the performance of its transit system relative to the system-wide service standards and policies through a comparison of samples of minority and non-minority routes from all modes of service provided.

Finally, GCRTA is required to conduct service and fare equity analyses prior to implementing service and/or fare changes to determine whether the planned changes will discriminate on the basis of race, color, or national origin.

## Demographic and Service Profile Maps and Charts

See the following files (*incorporated herein):*

1. Map of Interstate Highways, Arterials, and Major Streets
2. Map of Cuyahoga County Census Tracts
3. Map of 2024 GCRTA Levels of Service
4. Map of Percent Minority Population by Census Tract
5. Map of Low-Income Population by Census Tract
6. Map of Low-Income & Below Poverty population by Census Tract
7. Map of Minority, Below Poverty, and Low-Income Census
8. Map of GCRTA Service Availability
9. Map of GCRTA Transit Facilities
10. Map of Distribution of Transit Amenities (Shelter Locations)
11. Map of Location of Fare Media Distribution by Census Tract
12. Map of Service Quality Supervisory Work Zones
13. Table identifying each tract with its minority/non-minority and low-income/non-low-income composition.

## Requirement to Set Service Standards and Policies

The Title VI Standards and Policies mentioned above are directly related to Title VI. Specific standards and policies for Vehicle Load, Vehicle Headway (Service Frequency), Vehicle Assignment, On Time Performance, and Transit Amenities can be found in the attached documentation.

## Assessment of Compliance

(a) Establish Procedures: After each decennial census, GCRTA analyzes census tracts in its service area (Cuyahoga County). GCRTA designates a tract as "MINLOW" if it meets **either or both** of the following criteria:

- The minority population percentage of the tract exceeds that of the county.

- The low-income population percentage of the tract exceeds that of the county.

A tract that meets **neither** of the above criteria is designated “NONMINLOW”

(b) Annually, GCRTA staff classify routes into two categories according to areas served. GCRTA classifies a route as MINLOW if at least 1/3 of the route is located in a MINLOW census tract; otherwise, the route is classified as NONMINLOW. GCRTA staff compares the number of vehicle trips, vehicle miles, and vehicle hours by route category to ensure that minority and/or low-income areas receive their fair share of service.

(c) Evaluate system-wide service changes: Any time GCRTA plans a major system-wide service change, GCRTA will use the procedure in IV.3.7 (4) (a) above to determine whether the plan is discriminatory. If so, GCRTA will not implement the plan. A major service change is one that increases or decreases total annual vehicle revenue miles by at least ten (10) percent.

(d) Conduct compliance assessments: Every three (3) years GCRTA will assess its service for Title VI compliance in a manner similar to that presented in this document.

(e) Take action on findings: GCRTA will take action on any findings made by FTA or by GCRTA’s Senior Manager of OEO, ADA, and Organizational Culture.

## Other Areas of Title VI Considerations

### IV.5.4. (a) Changes in Service Features

GCRTA’s service planning document is the Service Management Plan (SMP), which is prepared annually. The 2025 Service Management Plan is attached. It calls for no major service changes in 2025.

This Title VI Monitoring Report was performed on the GCRTA service that was in operation in the second half of the year in 2024. All attached maps and documents reflect the network that was in operation as of December 31, 2024.

### IV.4.9. (b) Information Dissemination

GCRTA employs multiple communication methods to inform minority, low-income, and LEP communities of proposed service changes. These methods include both traditional and digital channels to ensure that information is broadly accessible throughout the service area.

Methods used include:

- Public notices published in local newspapers, including those with significant minority community readership.
- General outreach communications—including emails, letters, and other notifications—distributed to community development organizations, educational institutions, public officials, senior centers, faith-based organizations, libraries, and other community groups.
- Printed notices—including service change summaries, meeting and hearing information, and other posted passenger communications—placed on GCRTA buses, trains, transit centers, and stations.
- Press releases issued to print, broadcast, and electronic media outlets.
- Targeted outreach with special attention to affected service areas.

Digital communication methods include announcements posted on GCRTA's official social media channels, updates to GCRTA's website with service change materials, and email notifications to subscribed riders and community partners.

Service change information is also mailed to local community service organizations and governmental offices. For major service changes, public hearings are held and informational community meetings are scheduled to support meaningful public engagement.

Additional details on outreach to LEP individuals are provided in the LEP Communication Plan above.

## Meaningful Access to LEP Persons

## Please reference the Meaningful Access to LEP Persons – Language Assistance Plan section above in Chapter 2 for more detailed information.
## Monitoring Procedures for Transit Providers

### Requirement for Transit Providers

The Service Planning Section operates under Title VI considerations as basic criteria of service development. Care is given to ensure Title VI compliance when service changes are made. The Senior Manager of OEO, ADA, and Organizational Culture is notified in advance of service change proposals that require public involvement pursuant to GCRTA's Service Policy.

### Level of Service Methodology

- **Vehicle Load**

Overloads are investigated and corrected on a case-by-case basis. Reviewing 2024 complaints, GCRTA does not have a persistent or chronic overload problem. Vehicle load issues are reported to GCRTA Management via drivers, supervisors, service monitors, scheduling committee members

and customers through website, phone calls, email, written reports, and walk-in reports. The following table summarizes customer complaints related to overcrowding for second half of 2024.

Customer Complaints regarding Overcrowding in second half of 2024

| Overcrowding | |
|---|---|
| | **Value** |
| All complaints, 7/1/2024 - 12/31/2024 | 2,436 |
| Complaints excluding Web Spam / Advertising | 2,427 |
| Overcrowded Vehicle complaints | 4 |
| Overcrowded Vehicle complaint percentage | 0.16% |
| System total ridership, 7/1/2024 - 12/31/2024 | 12,457,082 |
| One Overcrowded Vehicle complaint for every ____ rides | 3,114,270 |
| Overcrowded Vehicle complaints per 100,000 rides | 0.03 |

| Items | |
|---|---|
| Overcrowding | 4 |
| Total Complaints | 2,427 |
| Overcrowding Complaints as a Percentage of Total Complaints | 0.16% |
| Ridership | 12,457,082 |
| **One Overcrowding complaint for every ___ rides** | 3,114,270 |

On average GCRTA receives one overcrowding complaint for every 3,114,270 rides.

GCRTA staff has verified the absence of an overcrowding problem by reviewing the maximum passenger load on each trip sampled for the National Transit Database. For each route, the average of the observed maximum passenger loads was calculated. Each route was classified as either MINLOW or NONMINLOW as described in Section IV.3.7.b. The average maximum load of all routes in the MINLOW category and NONMINLOW category were averaged. The averages are similar, and both averages are less than ten (10) passengers. These low averages are consistent with the absence of an overcrowding problem on MINLOW routes.

| Maximum Load Analysis | |
|---|---|
| | Value |
| MINLOW Average Max Load | 8.98 |
| NONMINLOW Average Max Load | 9.18 |

- **Vehicle Assignment**

As stated in GCRTA's Service Code, newer buses have lower per-mile maintenance costs and shall therefore be assigned to higher mileage blocks. Care shall be taken to maintain compliance with Title VI regulations. Coincidently, high mileage blocks serve minority and low-income areas.

However, to measure whether GCRTA vehicle assignments comply with Title VI, GCRTA reviewed vehicle assignments for all days in the second half of 2024.

The information was extracted from the OnRoute CAD/AVL system which records which vehicles operate on which routes. As described in Section IV.3.7.b, all routes were categorized as either MINLOW or NONMINLOW. As shown in the table, buses serving MINLOW routes and those serving NONMINLOW routes are nearly the same age.

Vehicle Assignment

| Route Category | Average Age |
|---|---|
| MINLOW | 7.5 |
| NONMINLOW | 6.5 |

For more detail, see the attached "GCRTA Title VI Route Analysis" file.

- **Vehicle Headway**

All routes in the minority and low-income service area comply with GCRTA's headway policy. All routes are reviewed and investigated further in response to customer complaints, suggestions, and comments.

Each route was classified as either MINLOW or NONMINLOW as described in Section IV.3.7.b. An average headway for each category was calculated. As indicated in the following table, MINLOW routes have shorter (i.e. better) average headways than NONMINLOW routes in the midday. Peak headways are similar for MINLOW and NONMINLOW routes.

Average Vehicle Headways

| Route | Headways |
|---|---|

| Category | Peak | Midday |
|---|---|---|
| MINLOW | 30.9 | 30.9 |
| NONMINLOW | 30 | 45 |

Schedules effective second half of 2024 (HASTUS Booking 2406)

For more detail, see the attached ““GCRTA Title VI Route Analysis” file.

- **On-Time Performance**

GCRTA on-time performance metrics are outlined in the Service Code. As described in Section IV.3.7.b, all routes were categorized as either MINLOW or NONMINLOW. As shown in the table below, on-time performance on MINLOW routes averages better than NONMINLOW routes, and GCRTA as a whole.

2024 Second Half On-time Performance

| Route Category | Percent On-time |
|---|---|
| MINLOW | 84.17% |
| NONMINLOW | 81.1% |
| All GCRTA | 83.75% |

For more detail, see the attached ““GCRTA Title VI Route Analysis” file.

- **Distribution of Transit Amenities**

See the attached “Transit Amenities” map file. Shelter concentration is higher in MINLOW areas than NONMINLOW areas.

- **Service Availability**

See the attached “Service Availability” map file. It shows a ¾ mile radius around each transit stop. As shown, an insignificant fraction of MINLOW areas are not within ¾ mile of a stop, while a significant fraction of NONMINLOW areas are more than ¾ mile from a stop.

- **Service Quality Supervisory Work Zones**

See the attached “Supervisory Work Zones” map file. The work zones show no inequality in design of the zones.

## Service and Fare Equity Analysis

### Service and Fare Equity Analysis

Since the last Title VI Program submission, GCRTA has made no major service changes and therefore has not performed a service equity analysis. GCRTA has completed two fare equity analyses, as follows:

A fare equity analysis was performed for a fare structure change that was ultimately presented to the Board of Trustees as Resolution 2025-042, adopted March 18, 2025. The fare structure change comprised these elements:

(4) Fare capping: a policy to allow customers to enjoy the discounts of unlimited-use passes without paying the full cost of a pass in advance and without incurring losses when their usage of the transit system falls below the break-even level of a pass.
(4) Account-based ticketing: a system that enables fare capping by counting each customer's trips within a given time period to determine when subsequent trips made by that customer during that time period should be fare-free.
(4) Elimination of fare surcharges: to speed up implementation of fare capping, discontinue fare surcharges that apply to a minuscule percentage of annual rides and that generate an insignificant amount of annual revenue.
(4) Open payment: provides an additional (optional) method of paying fares that using a "token" not issued by RTA, such as a customer's own credit card or phone. Some customers may prefer to use this method despite its higher price. Open payment is included in this analysis, but its adoption may be deferred to a later date.

The analysis concluded that "the proposal will neither create a disparate impact on minority customers nor impose a disproportionate burden on low-income customers. On the contrary, minority customers and low-income customers will be the primary beneficiaries of the proposed fare structure change."

More recently, the authority staff began to consider asking the Board of Trustees to authorize the CEO/General Manager to implement a convenience fee for users of mobile ticketing. Though such a fee may or may not require a fare equity analysis, the staff conducted a fare equity analysis to be on the safe side. The analysis concluded that "the proposal will neither create a disparate impact on minority customers nor impose a disproportionate burden on low-income customers."

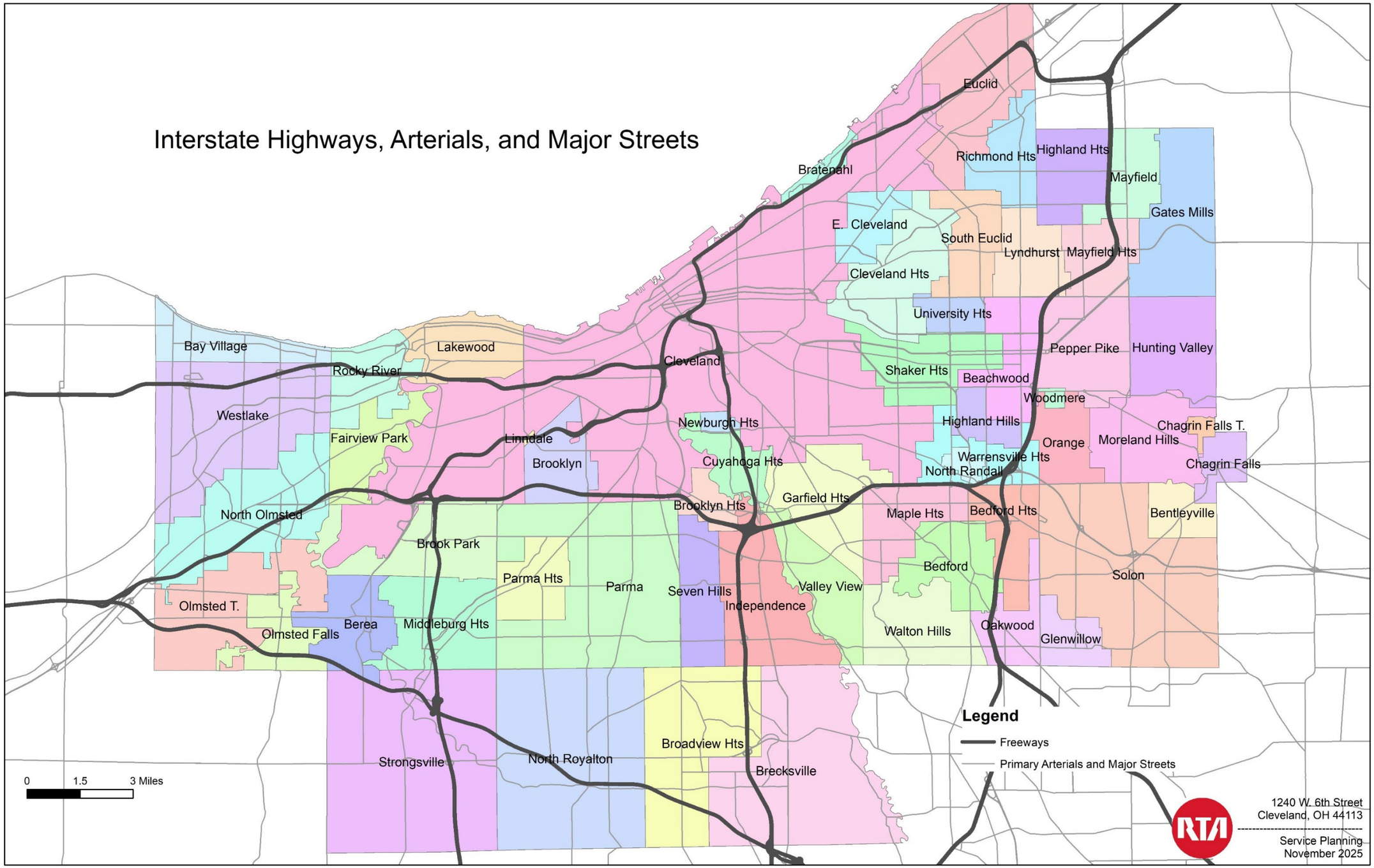
## Attachments for Chapter 3

A. **Maps**

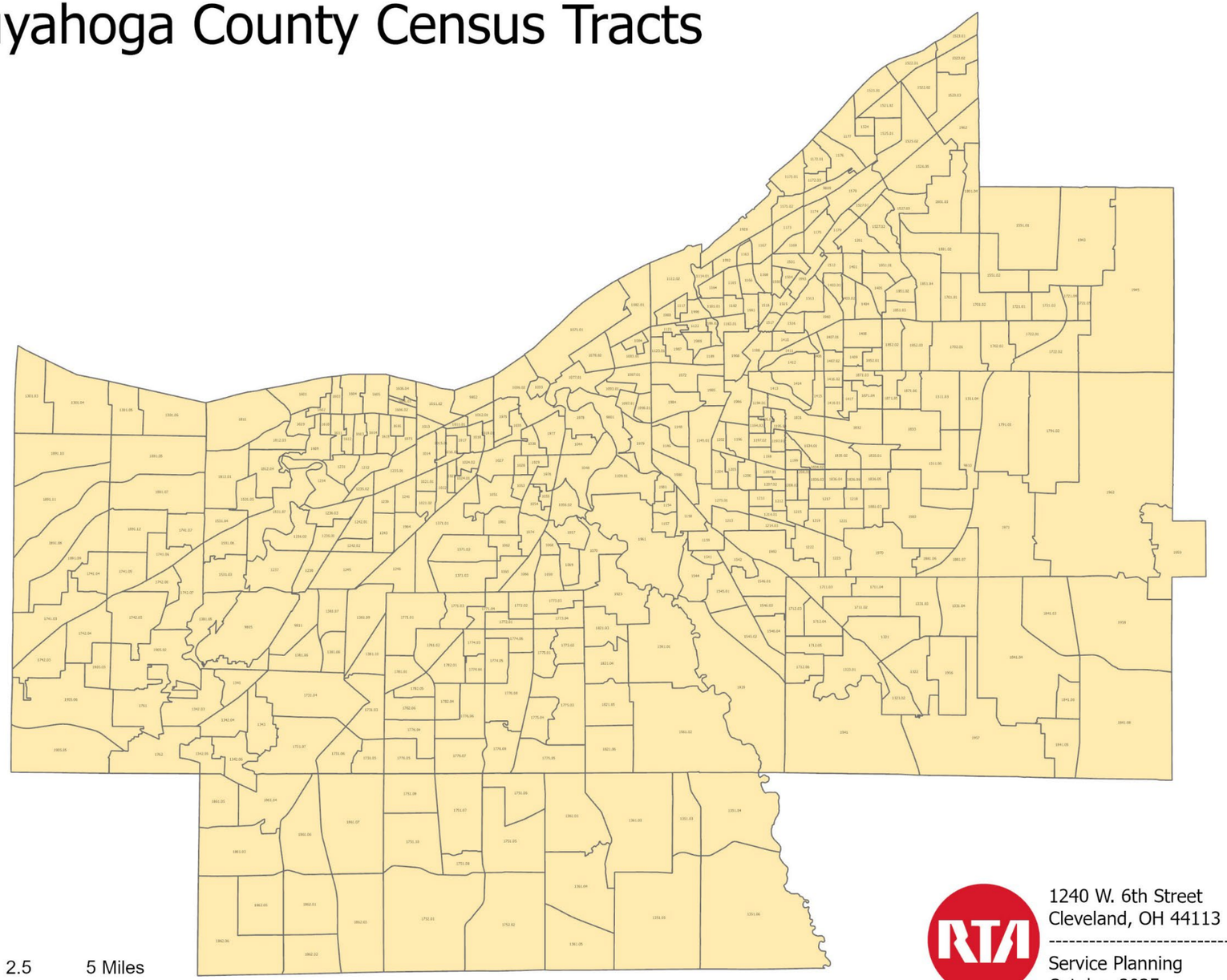
1. Map of Interstate Highways, Arterials, and Major Streets
2. Map of Cuyahoga County Census Tracts
3. GCRTA Levels of Service as of December 30, 2024
4. Map of Percent Minority Population by Census Tract
5. Map of Low-Income Population by Census Tract
6. Map of Below Poverty & Low-Income population by Census Tract
7. Map of Minority, Below Poverty, and Low-Income Census
8. Map of GCRTA Service Availability
9. Map of GCRTA Transit Facilities
10. Map of Distribution of Transit Amenities (Shelter Locations)
11. Map of Location of Fare Media Distribution by Census Tract
12. Map of Service Quality Supervisory Work Zones

B. **Documents**

1. GCRTA Services code (December 2018)
2. 2025 Service Management Plan (2025 SMP)
3. Table Identifying Each Tract with its Minority/Non-Minority and Low-Income/Non-Low-Income Composition (GCRTA Tracts ACS 2023)
4. GCRTA Title VI Route Analysis


Interstate Highways, Arterials, and Major Streets
Euclid
Richmond Hts
Highland Hts
Bratenahl
Mayfield
Gates Mills
E. Cleveland
South Euclid
Lyndhurst
Mayfield Hts
Cleveland Hts
University Hts
Bay Village
Lakewood
Rocky River
Cleveland
Pepper Pike
Hunting Valley
Shaker Hts
Beachwood
Woodmere
Westlake
Newburgh Hts
Highland Hills
Chagrin Falls T.
Fairview Park
Linndale
Orange
Moreland Hills
Brooklyn
Cuyahoga Hts
Warrensville Hts
Chagrin Falls
North Randall
Garfield Hts
Brooklyn Hts
Maple Hts
Bedford Hts
Bentleyville
North Olmsted
Brook Park
Bedford
Parma Hts
Parma
Seven Hills
Valley View
Solon
Olmsted T.
Independence
Berea
Middleburg Hts
Walton Hills
Oakwood
Olmsted Falls
Glenwillow
Broadview Hts
Strongsville
North Royalton
Brecksville
0
1.5
3 Miles
Legend
Freeways
Primary Arterials and Major Streets
RTA
1240 W. 6th Street
Cleveland, OH 44113
Service Planning
November 2025

# Cuyahoga County Census Tracts



N

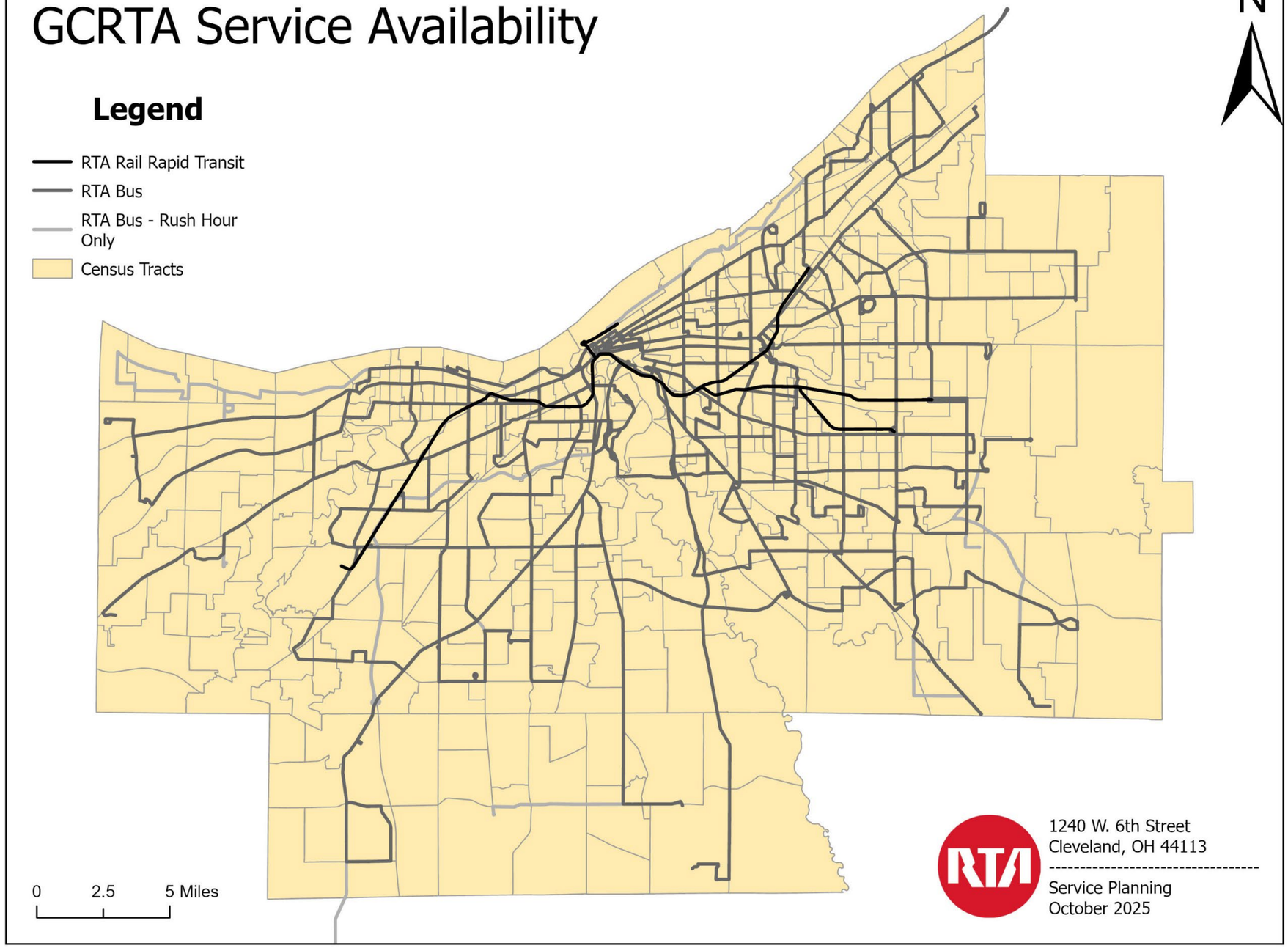
0 2.5 5 Miles

1240 W. 6th Street
Cleveland, OH 44113

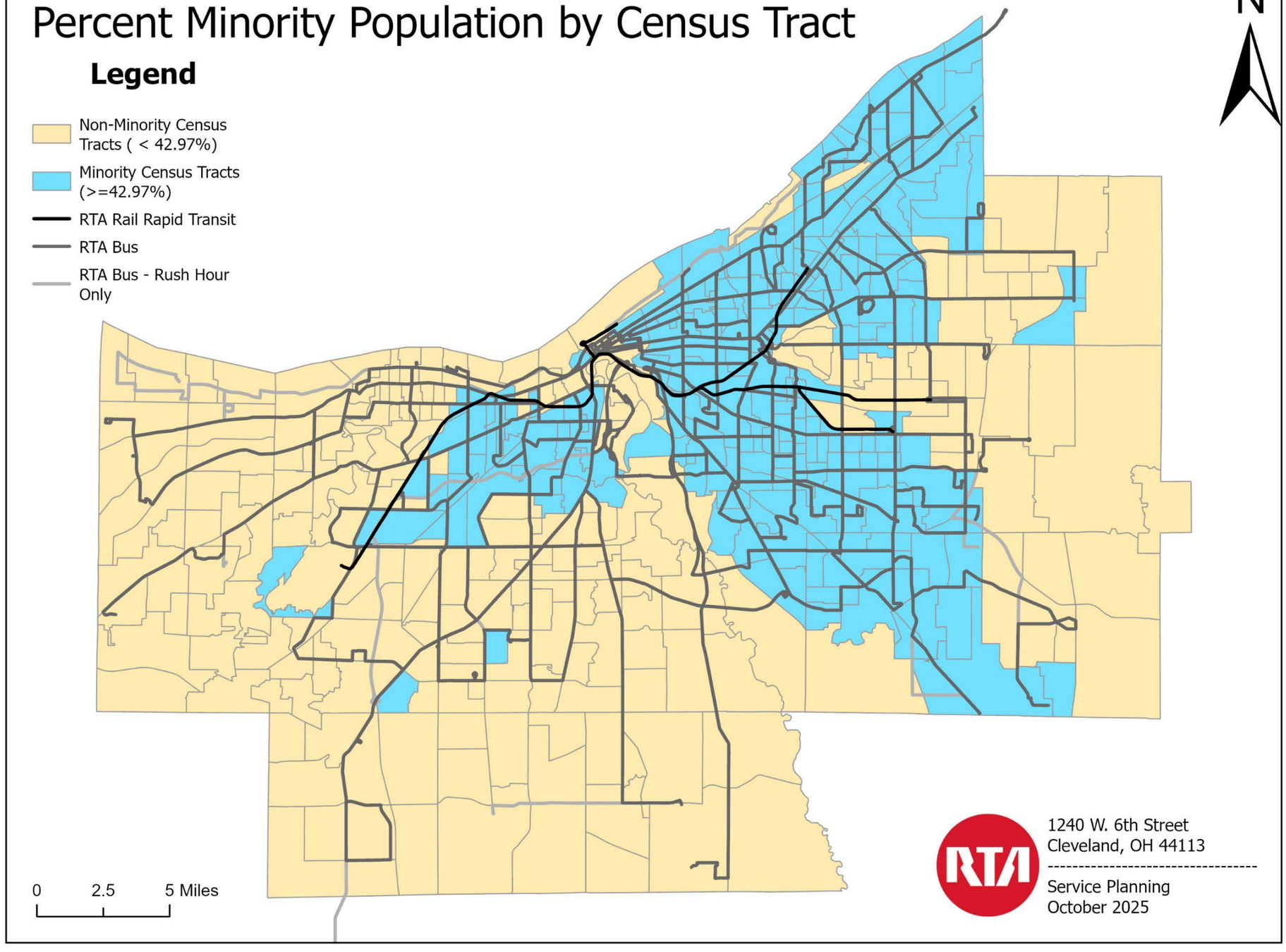
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Service Planning
October 2025

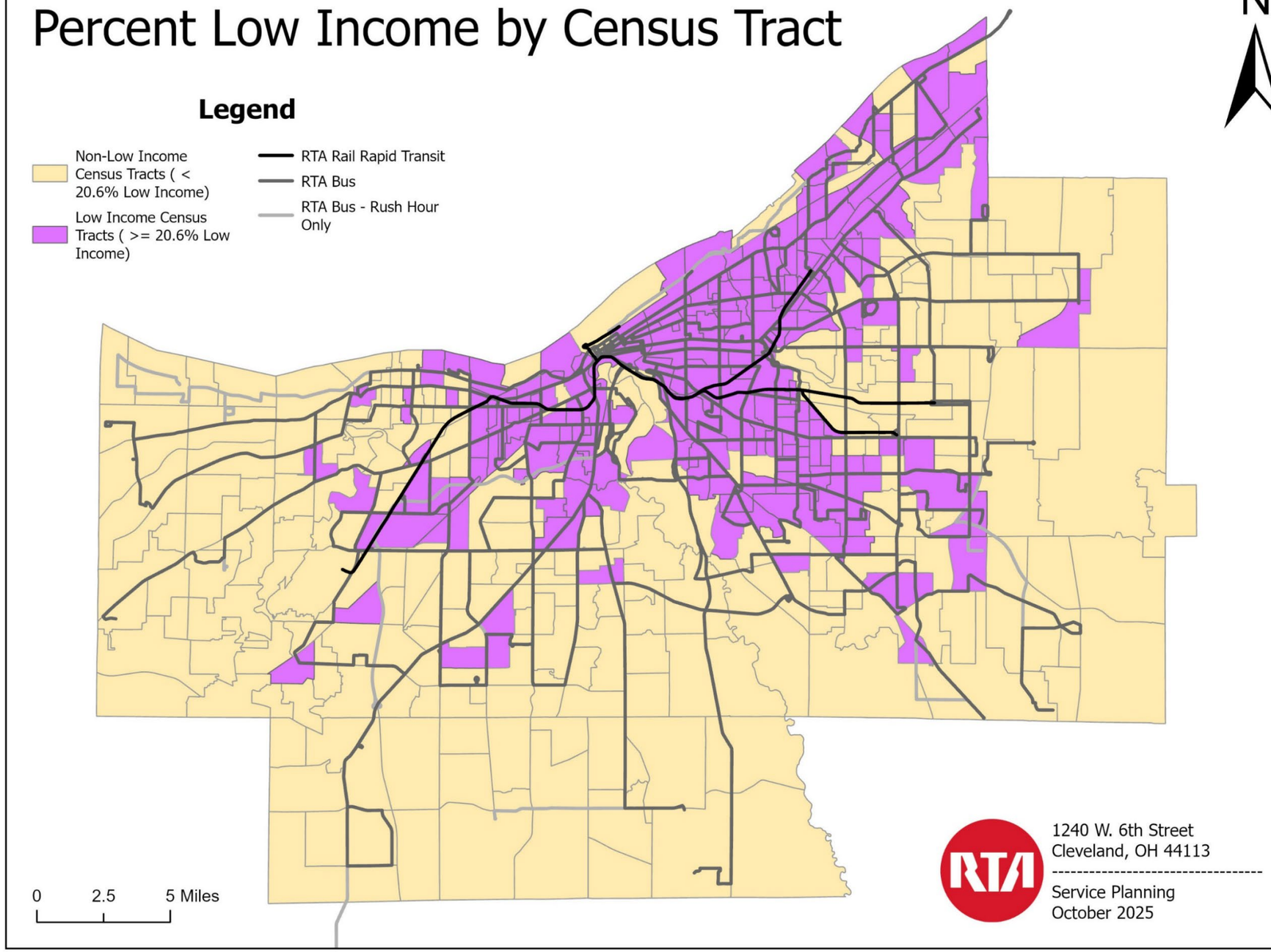
# GCRTA Service Availability



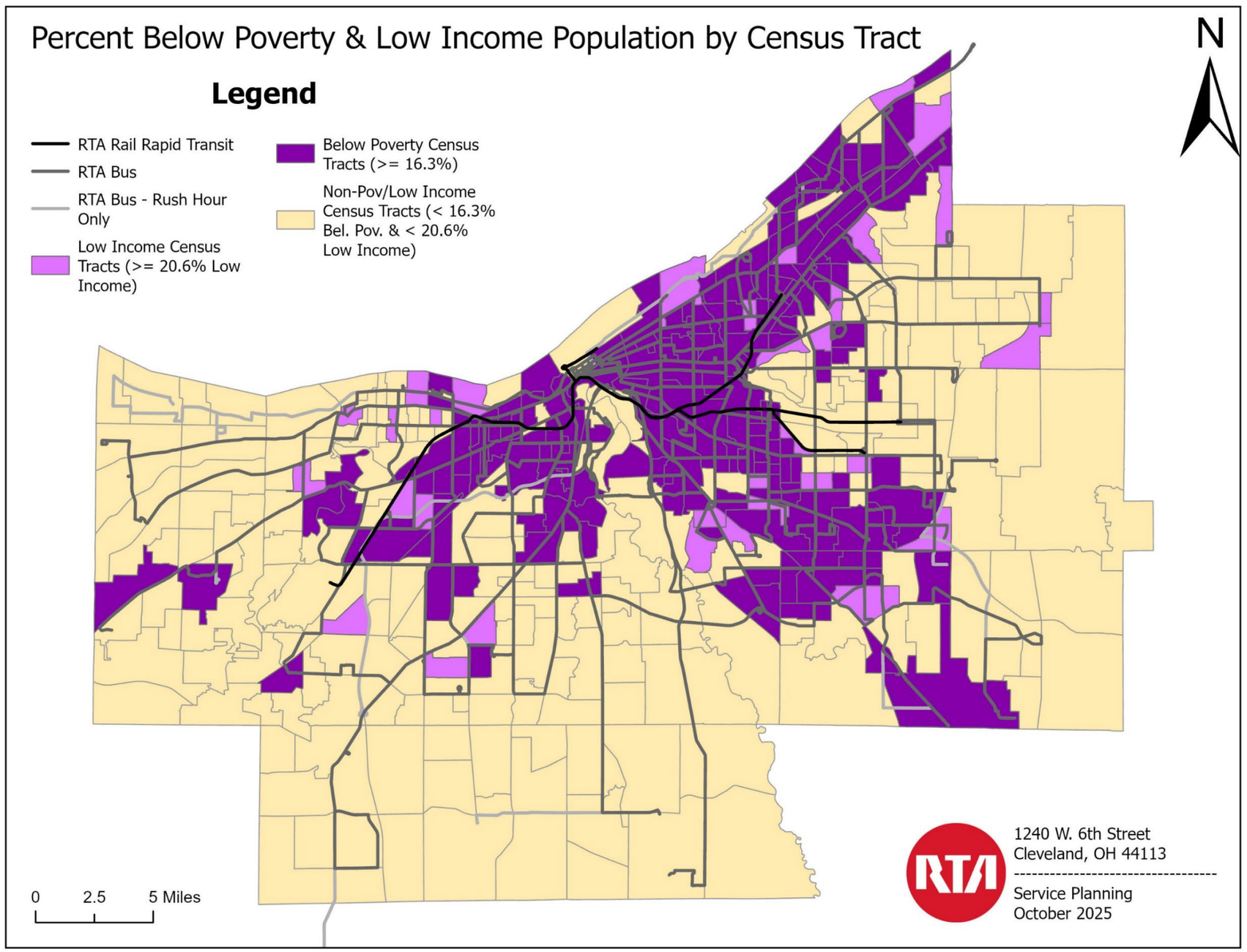
# Percent Minority Population by Census Tract



# Percent Low Income by Census Tract

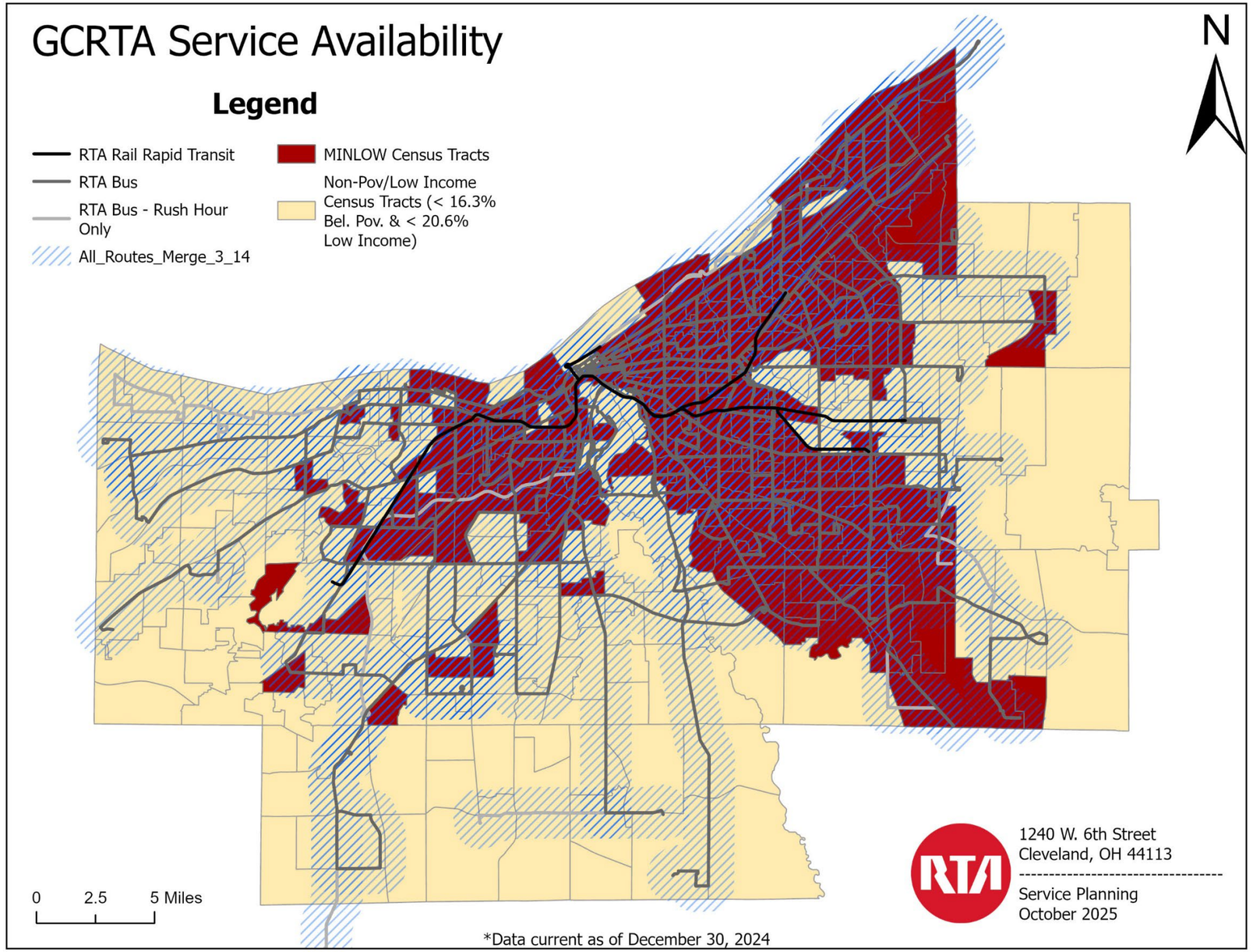


# Percent Below Poverty & Low Income Population by Census Tract

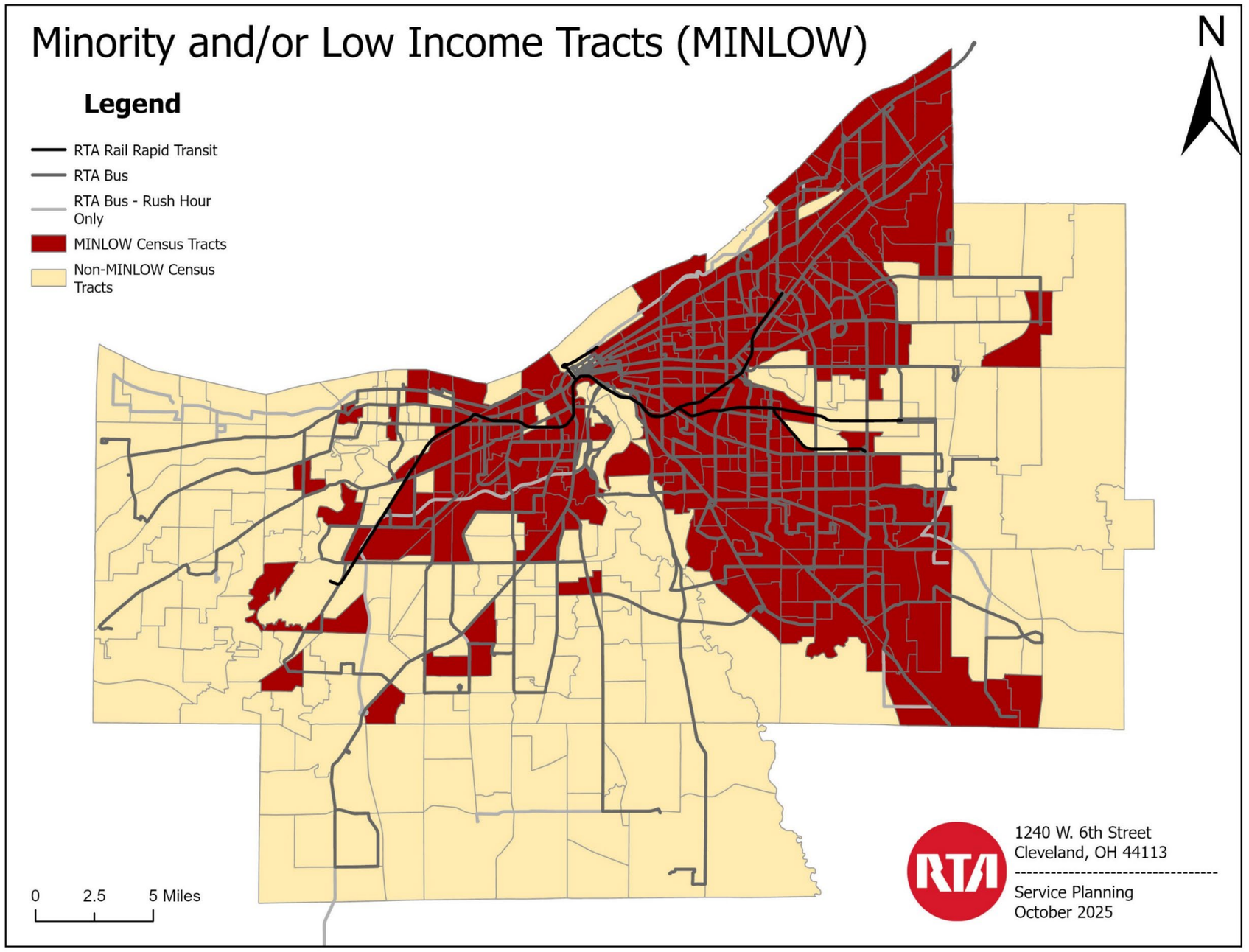



1240 W. 6th Street
Cleveland, OH 44113
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Service Planning
October 2025

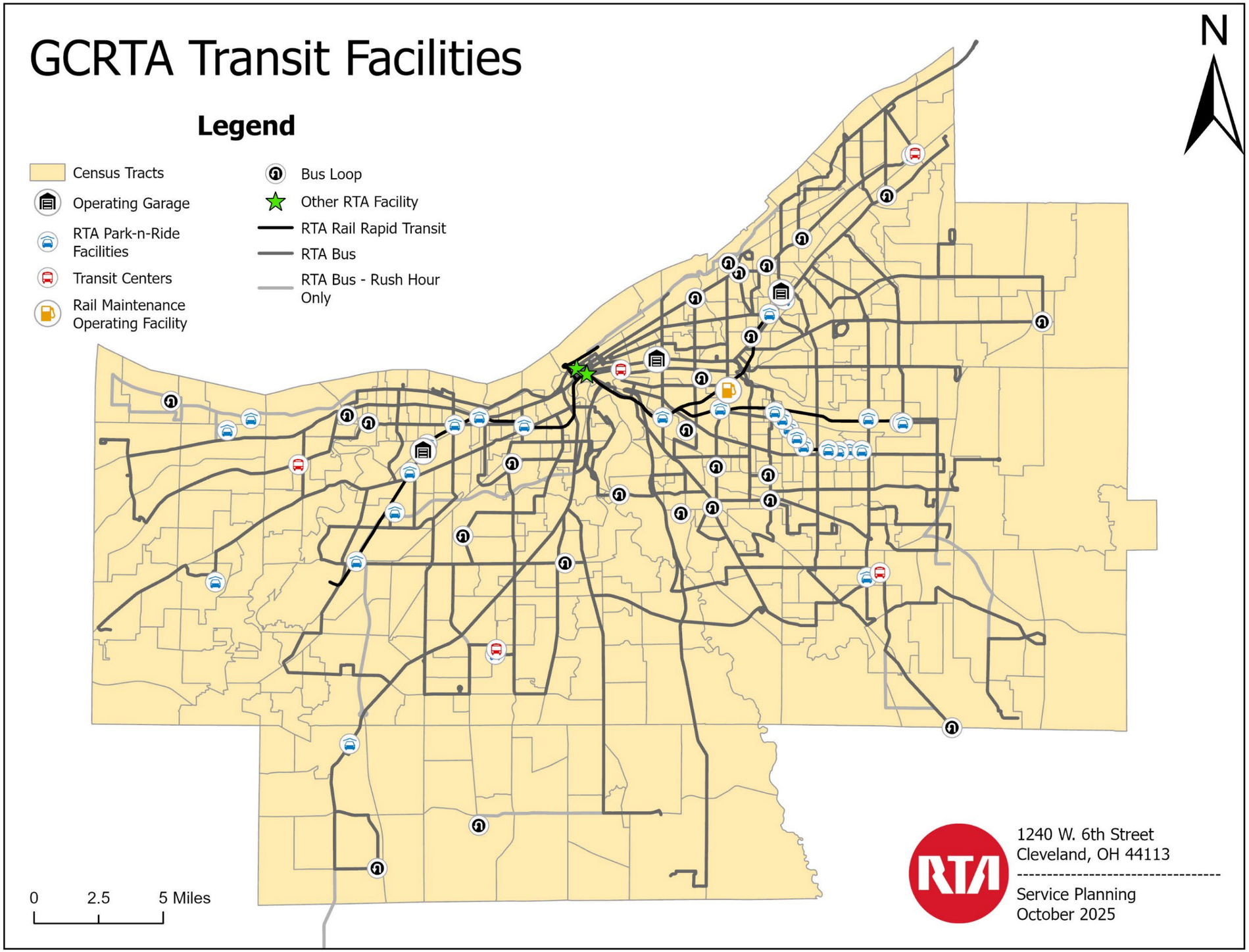
# GCRTA Service Availability



# Minority and/or Low Income Tracts (MINLOW)



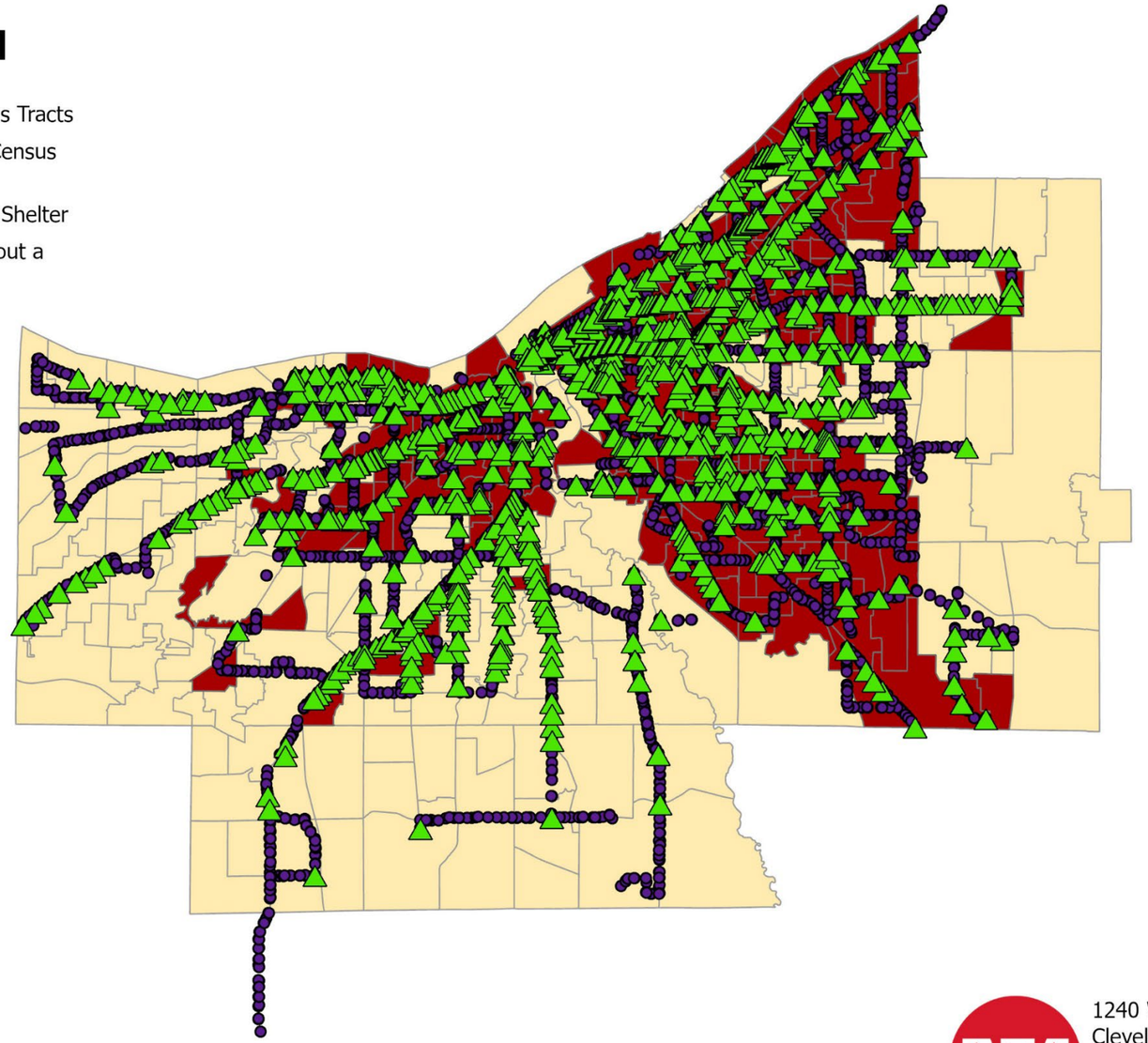
# GCRTA Transit Facilities



# Distribution of Transit Amenities

## Legend

- MINLOW Census Tracts
- Non-MINLOW Census Tracts
- RTA Stops with Shelter
- RTA Stops without a Shelter



N

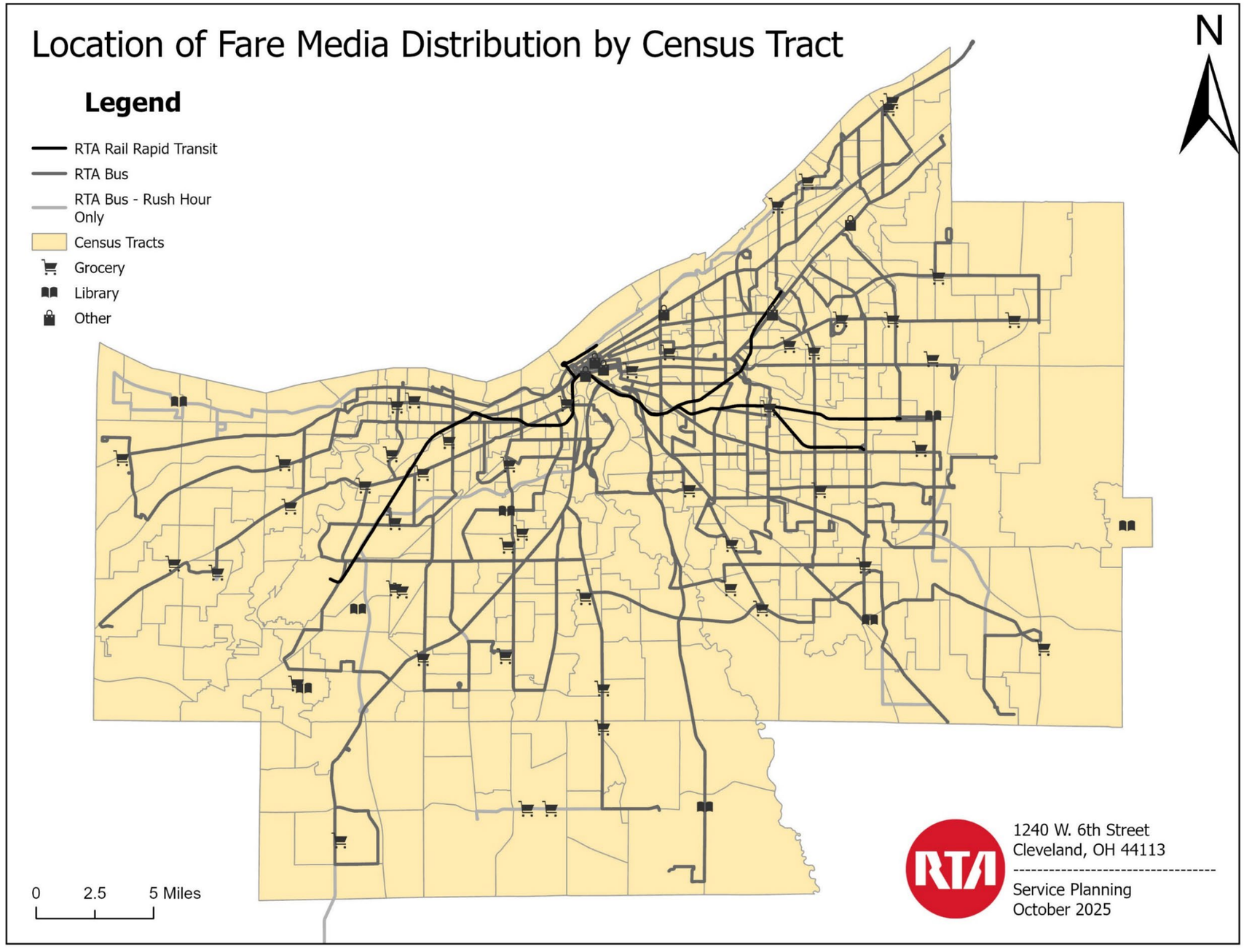
0 2.5 5 Miles

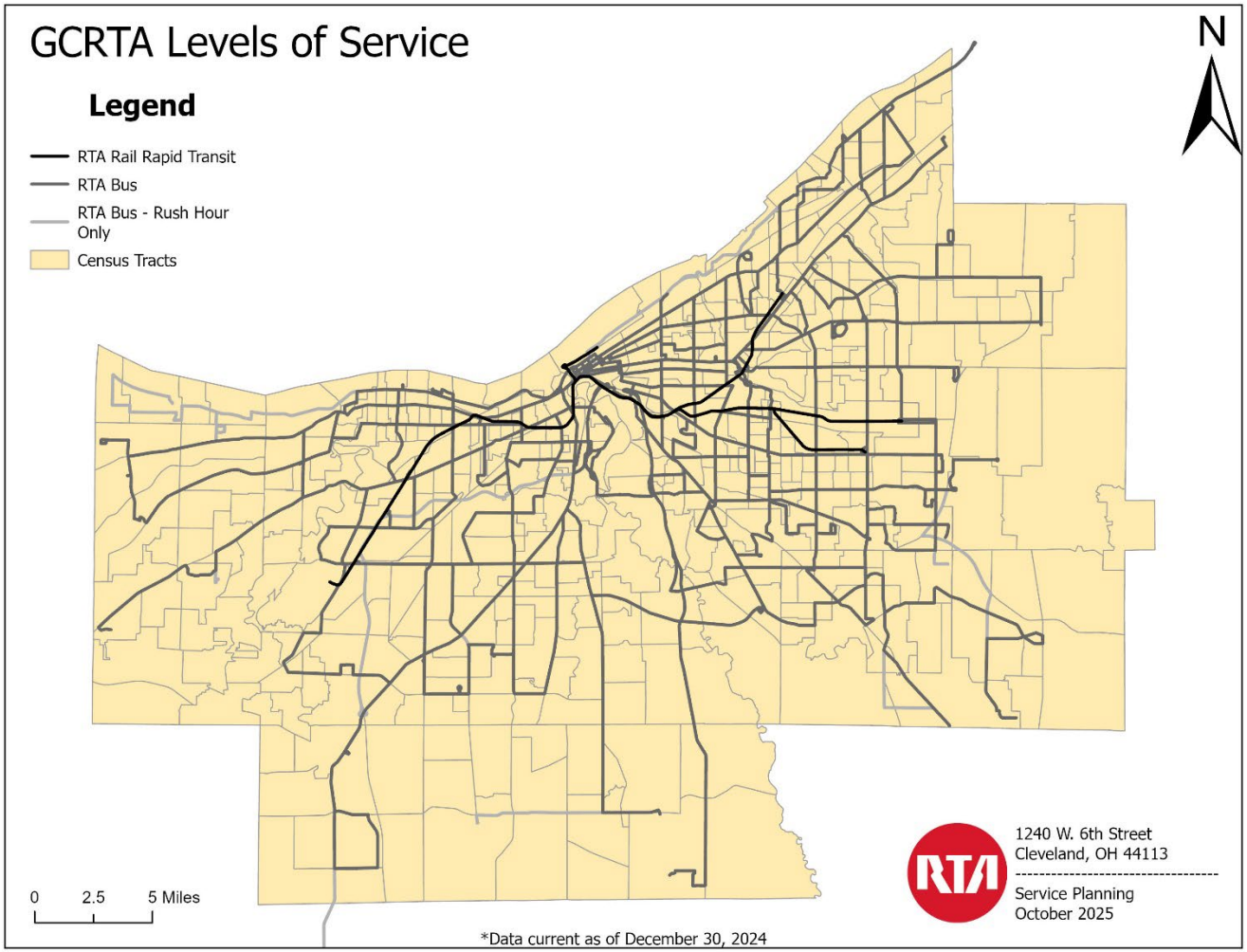
1240 W. 6th Street
Cleveland, OH 44113

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Service Planning
October 2025

# Location of Fare Media Distribution by Census Tract




GCRTA Levels of Service
Legend
RTA Rail Rapid Transit
RTA Bus
RTA Bus - Rush Hour Only
Census Tracts
N
0 2.5 5 Miles
*Data current as of December 30, 2024
1240 W. 6th Street
Cleveland, OH 44113
Service Planning
October 2025

CODIFIED RULES AND REGULATIONS

OF THE

GREATER CLEVELAND REGIONAL TRANSIT AUTHORITY

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PART TEN - SERVICES CODE

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EDITOR'S NOTE: Resolution No. 2019-22, passed February 19, 2019, adopted amendments to the Bylaws of the Greater Cleveland Regional Transit Authority. Wherever the term "CEO, General Manager/Secretary-Treasurer" appears, it is meant to be read as "General Manager, Chief Executive Officer" or "Secretary-Treasurer", depending on context.


TITLE TWO - Service Policy

Chap. 1010. General Provisions and Definitions.
Chap. 1011. Route Network Design.
Chap. 1012. Service Management.
Chap. 1013. Service Standards.
Chap. 1014. Service Policies.
Chap. 1024. Service Development/Approval/Implementation Process. (Repealed)

TITLE FOUR - Miscellaneous Service Regulations

Chap. 1050. Modification in Service.
Chap. 1064. Bus Park-and-Ride Facilities Program Procedures. (Repealed)
Chap. 1066. Promotional Activities. (Repealed)
Chap. 1080. Service to Activity Centers. (Repealed)
Chap. 1082. Service to Auxiliary and Reserve Police. (Repealed)
Chap. 1084. Service to Elderly and Handicapped. (Repealed)
Chap. 1085. ADA Complementary Paratransit Plan. (Repealed)
Chap. 1086. Paratransit and Accessible Service Policy.
Chap. 1087. Transit Oriented Development.

TITLE FOUR - Miscellaneous Service Regulations (Cont.)
Chap. 1088. Arts in Transit Program Policy.
Chap. 1089. Transit Waiting Environment and Community Partner Investment Programs.
Chap. 1090. Long Range Plan.
Chap. 1091. Strategic Plan.
Chap. 1092. Food and Beverage Sales Policy.
Chap. 1093. Advertising Policy.
Chap. 1094. Newspaper Dispensing Boxes Policy. (Repealed)
Chap. 1096. Commitment on Sustainability Policy.
Chap. 1098. Commitment on Environmental Policy.

CODIFIED RULES AND REGULATIONS

OF THE

GREATER CLEVELAND REGIONAL TRANSIT AUTHORITY

---

PART TEN - SERVICES CODE

---

TITLE TWO - Service Policy
Chap. 1010. General Provisions and Definitions.
Chap. 1011. Route Network Design.
Chap. 1012. Service Management.
Chap. 1013. Service Standards.
Chap. 1014. Service Policies.
Chap. 1024. Service Development/Approval/Implementation Process. (Repealed)

# CHAPTER 1010
## General Provisions and Definitions

1010.01 Purpose. 1010.02 Definitions.

---

**1010.01 PURPOSE.**

The purposes of this service policy are:

(a) To establish guidance for public transit service operation including network design, implementation, and monitoring; and

(b) To ensure resources are utilized efficiently and produce the greatest value for the service area.

(Res. 2017-58. Passed 7-18-17.)

**1010.02 DEFINITIONS.**

As used in this service policy:

(a) "Adverse effect." A major geographical or time-based change in service which may include, but is not limited to, span of service changes, frequency changes, route segment extension or elimination, route alignment changes, increase or decrease in headways, or route creation or elimination.

(b) "Block." Daily operation assignment of a bus.

(c) "Community meeting." A publicized meeting, accessible via public transit, open to the public, and held within an Americans with Disabilities Act accessible meeting room for the purpose of gathering comments on a transit-related proposal. The requirements of Chapter 214, Public Hearing Process, do not apply.

(d) "Facility." Any Authority-owned building.

(e) "Fare change." Increase or decrease in the price of service.

(f) "Fixed route." A transit route that is scheduled to operate over a specific alignment.

(g) "Headway." Time interval between vehicles moving along the same road or track in the same direction.

(h) "Major service change." Service change that increases or decreases total vehicle-miles of service by ten percent or more.

(i) "Maximum load point." The location along a transit line where the greatest vehicle loads occur.

(j) "Rush hours." The weekday hours from 6:00 to 9:00 a.m. and 3:00 to 6:00 p.m.

(k) "Public hearing." A community meeting that meets all requirements of Chapter 214, Public Hearing Process.

(l) "Route deviation." A scheduled exception to the normal fixed route of a bus line in order to serve a specific activity center.

(m) "Span of service." Number of hours and days when service operates. (Res. 2017-58. Passed 7-18-17.)

# CHAPTER 1011
# Route Network Design

1011.01 Objectives. 1011.02 Bus Stop Policy.

---

**1011.01 OBJECTIVES.**

The objectives of the Authority's route network design are:

(a) To maximize bus/rail interface opportunities;

(b) To minimize route duplication;

(c) Two-way service on a street is desirable;

(d) Service should utilize the most direct routing possible:

(1) Deviations should not be considered unless there is a compelling reason such as a major activity generator.

A. Benefits of such deviations must outweigh disadvantages to passengers.

B. Factors to be considered include percentage of passengers benefitting from the deviation, the amount of time to make the deviation, and the additional costs.

(2) It is not appropriate to deviate into private development sites, except at a route terminus;

(e) Route length should be limited by the ability to keep service operating on schedule; and

(f) To the extent possible, schedules will be coordinated to facilitate transfers. (Res. 2017-58. Passed 7-18-17.)

**1011.02 BUS STOP POLICY.**

(a) Safety of customers and vehicles is the highest priority for bus stop placement, including relocating an existing bus stop or establishing a new bus stop.

(b) Topography, vehicular traffic, land use, pedestrian activity, and street conditions will be considered in the placement of bus stops.

(c) Bus stop spacing will seek a balance between customer preferences for a reasonably fast trip on the bus and a reasonably short walk to/from a bus stop.

(d) Bus stop establishment, relocation, and removal will be at the discretion of the Authority for the betterment of its customers.

(e) Bus stops are to be located close to signalized intersections and crosswalks when possible.

(f) The CEO, General Manager/Secretary-Treasurer shall implement and publicize specific standards and guidelines for bus stops to implement this policy. (Res. 2017-58. Passed 7-18-17.)

# CHAPTER 1012
## Service Management

1012.01 Monitoring of service utilization and productivity.
1012.02 Service Management Plan.
1012.03 Public involvement requirements for service changes.

---

### 1012.01 MONITORING OF SERVICE UTILIZATION AND PRODUCTIVITY.

(a) The CEO, General Manager/Secretary-Treasurer will monitor the utilization (ridership), productivity (boardings per bus/train hour), and overall network performance of bus and rail services at least annually.

(b) To provide fair comparisons of bus route performance, bus routes are compared with other routes in the same category of service:

(1) Radial - routes that travel to and from downtown (excluding Park-N-Ride);
(2) Crosstown - routes that run entirely outside of downtown;
(3) Park-N-Ride - routes that operate on freeways between downtown and Park-N-Ride lots;
(4) Trolley - routes that operate a local service traveling entirely within a small, dense area.

(Res. 2017-58. Passed 7-18-17.)

### 1012.02 SERVICE MANAGEMENT PLAN.

(a) An annual Service Management Plan ("Plan") will be submitted to the Board.

(1) The Plan will describe changes to fixed-route transit service that the Authority plans to implement within the next fiscal year.
(2) The Plan will contain, at minimum, the following sections:
A. Current Plans for service;
B. Bus Route Performance Summary by Route Category;
C. Bus Routes in the Bottom Quartile of Their Route Category.

(b) Routes that perform in the bottom quartile of their route category will be analyzed for the following potential actions:

(1) Schedule adjustments;
(2) Service span adjustments;

(3) Alignment changes;
(4) Route discontinuance or consolidation with another route;
(5) Seeking outside funding opportunities.
(Res. 2017-58. Passed 7-18-17.)

**1012.03 PUBLIC INVOLVEMENT REQUIREMENTS FOR SERVICE CHANGES.**

(a) A public hearing shall be conducted when the Authority is considering a service frequency reduction if the frequency being considered is less than the policy standard in Section 1013.02, Vehicle Headway for Each Mode.

(b) When considering a permanent removal of all rail service during any time period from a rail station, the following requirements apply:

(1) A public hearing shall be conducted if the time period is longer than two hours.
(2) Either a public hearing or a community meeting shall be conducted if the time period is longer than one hour.

(c) When considering a permanent removal of all fixed-route transit service during any time period from a road segment, the following requirements apply:

(1) A public hearing shall be conducted if the time period is longer than two hours and the road segment is longer than one mile.
(2) Either a public hearing or a community meeting shall be conducted if the time period is longer than one hour and the road segment is longer than one-half mile.

(d) Public involvement is not required for construction-related service changes, or for changes to special event or seasonal services, non-fixed route services, and subsidized services.

(e) Any service can be discontinued or changed within thirteen months of implementation without public involvement.

(f) The Authority recognizes that a series of small service reductions, each not requiring a public hearing, can have the effect of a single large service reduction that requires a public hearing. Therefore, to determine whether a public hearing is required, the contemplated change on a street segment or at a rail station shall be combined with all other changes made on that street segment or at that rail station since the more recent of two dates:

(1) The date one year before the effective date of the contemplated change; or
(2) The date of the last public-hearing-supported change.

(g) A public hearing will be conducted in accordance with Chapter 214 for changes to service standards and/or policies not addressed above.
(Res. 2017-58. Passed 7-18-17.)

# CHAPTER 1013
## Service Standards

1013.01 Vehicle load for each mode.
1013.02 Vehicle headway for each mode.
1013.03 On-time performance.
1013.04 Service availability for each mode.

---

**1013.01 VEHICLE LOAD FOR EACH MODE.**

(a) Adherence to the maximum load standards in the table below shall be monitored as follows:

(1) Passengers are counted at the point on the route where most trips carry the highest load.

(2) Passenger loads are averaged for thirty-minute intervals during rush hours and sixty-minute intervals during other time periods.

(3) If one trip has an unusually high load, it shall be excluded from the average.

| MAXIMUM LOAD STANDARDS<br>Number of Passengers | | |
|---|---|---|
| SERVICE TYPE | RUSH HOURS | NON-RUSH HOURS |
| Park-N-Ride | 54-63 | 49-57 |
| Regular Bus (approx. 40-ft.) | 54 | 44 |
| Trolley (approx.. 30-35 ft.) | 36 | 36 |
| Heavy Rail (per car) | 142 | 117 |
| Light Rail (per car) | 132 | 108 |
| Articulated bus (approx.. 60 ft.) | 80 | 65 |

(Res. 2017-58. Passed 7-18-17.)

**1013.02 VEHICLE HEADWAY FOR EACH MODE.**

Service frequency is based on ridership, but, during each time period that a route operates, the minimum number of trips per hour per direction will be as follows:

| | 5 a.m. - 10 p.m. | Other Times |
|---|---|---|
| Rail * | 2 | 1 |
| Bus * | 1 | 1 |

* = Does not apply to minor branches and special services

To maintain service coverage with limited resources, the Authority may make an exception to the minimums shown above. The Authority will conduct a public hearing before initiating such an exception.
(Res. 2017-58. Passed 7-18-17.)

**1013.03 ON-TIME PERFORMANCE.**

(a) The following standard applies to all modes:

(1) A trip is deemed "late" if it arrives or departs more than five minutes after the scheduled time.

(2) A trip is deemed "early" if it departs before the scheduled time.

(3) A trip is deemed "on-time" if it is neither "late" nor "early" as defined above.

(b) The long-term goal is 100 percent "on time"; the near-term goal is eighty percent on-time.
(Res. 2017-58. Passed 7-18-17.)

**1013.04 SERVICE AVAILABILITY FOR EACH MODE.**

(a) Transit service availability is critical for providing access to jobs, education, medical care and other activities and opportunities necessary for quality of life.

(b) ADA-certified residents who live within 3/4 mile of bus or rapid transit service can use complementary Paratransit service to access all other areas served by regular transit routes.

(c) Ideally, 365-day bus or rapid transit service should be located near every Cuyahoga County resident. Rapid transit service includes rail and bus rapid transit service.

(d) Resource limitations and low-density settlement patterns currently preclude realization of the ideal.

(e) The Authority will provide 365-day public transit service within 3/4 miles of at least 60 percent of Cuyahoga County residents. Public transit service is any transit service open to the general public, including bus, rail, and bus rapid transit service.
(Res. 2017-58. Passed 7-18-17; Res. 2018-31. Passed 3-27-18; Res. 2018-72. Passed 7-24-18.)

# CHAPTER 1014
## Service Policies

1014.01 Transit amenities.
1014.02 Vehicle assignment.
1014.03 Disparate impact.
1014.04 Disproportionate burden.
1014.05 Facilities.

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**1014.01 TRANSIT AMENITIES.**

(a) The Authority seeks to provide seating and shelter at bus stops and rail stations if sufficient space is available and thirty or more daily riders are expected to use the shelter. The Authority considers a canopy to be one form of passenger shelter. The Authority installs and services waste receptacles only on Authority property. Each municipality decides whether to install and service waste receptacles in the public right-of-way.

(b) On Rail/BRT, printed and/or digital service information is attached to walls and shelters if they exist; digital displays are provided at busier stations. On bus routes, printed and/or digital service information is provided at transit centers and Park-N-Ride lots.

(c) Elevators will be installed and maintained to the extent required by the Americans with Disabilities Act. Existing escalators will remain in service unless they become cost-prohibitive to maintain.
(Res. 2017-58. Passed 7-18-17; Res. 2023-60. Passed 7-25-23.)

**1014.02 VEHICLE ASSIGNMENT.**

(a) Euclid Corridor vehicles are specially designed for use on the HealthLine with its combination of left-side and right-side stations. These buses may not be utilized on any other route.

(b) Standard articulated buses must be assigned to routes whose schedules have been built for high-capacity buses.

(c) Over-the-road buses have narrow aisles, lack rear doors and are not well suited to regular transit routes where passengers board and alight at the same stop. These vehicles shall be assigned exclusively to Park-N-Ride routes.

(d) Downtown Trolley service shall have first priority for assignment of "Trolley" branded vehicles. Trolley vehicles can also be assigned to regular bus routes; however, to prevent passenger confusion, these vehicles shall not be operated on non-trolley services in the downtown area.

(e) Standard transit buses shall be assigned to blocks based on the randomly occurring position of the bus in the garage at pull-out time. By avoiding systematic assignment of standard buses to routes, RTA expects to maintain compliance with Title VI (nondiscrimination) regulations. Monitoring will be conducted as required by Title VI to verify compliance.
(Res. 2017-58. Passed 7-18-17; Res. 2023-60. Passed 7-25-23.)

**1014.03 DISPARATE IMPACT.**

(a) When considering a fare change and/or major service change, the Authority will conduct a fare and/or service equity analysis. If the fare and/or service equity analysis demonstrates a disparate impact on minority populations, the Authority will revise its plan and reanalyze impacts until analysis shows that the alternative(s) would not have a disparate impact.

(b) Should the impact of any fare change cause the percent change in average fare for minority populations to exceed the percent change in average fare for non-minority populations by more than five percentage points, that impact will be considered a disparate impact.

(c) Should the impact of any major service change require the minority population to bear adverse effects more than ten percentage points greater than those adverse effects borne by the non-minority population, that impact will be considered a disparate impact.

(d) If no alternative can be found that would not have a disparate impact on minority populations, then the Authority may implement the least discriminatory alternative only if:

(1) The Authority has a substantial legitimate justification for the proposed fare and/or service change, and

(2) The Authority can show that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish the Authority's legitimate program goal.
(Res. 2017-58. Passed 7-18-17.)

**1014.04 DISPROPORTIONATE BURDEN.**

(a) When considering a fare change and/or major service change, the Authority will conduct a fare and/or service equity analysis.

(1) For the purpose of this policy, the Authority will include in the "low-income" category any person whose median household income is at or below the U.S. Department of Health and Human Services ("HHS") poverty guidelines and everyone whose total household income is less than twenty-five thousand dollars ($25,000).
(2) The Authority will periodically reconsider the twenty-five thousand dollar ($25,000) threshold because of the effects of inflation.

(b) Should the impact of any fare change cause the percent change in the average fare for low-income populations to exceed the percent change in the average fare for non-low-income populations by more than five percentage points, that burden will be considered a disproportionate burden.

(c) Should the impact of any major service change require a low-income population to bear adverse effects more than ten percentage points greater than those adverse effects borne by the non-low-income population, that burden will be considered a disproportionate burden.

(d) If the fare and/or service equity analysis demonstrates a disproportionate burden borne by low-income riders, the Authority will describe alternatives and will avoid, minimize, or mitigate impacts where practicable.
(Res. 2017-58. Passed 7-18-17.)

**1014.05 FACILITIES.**
(a) When making decisions about facilities, the Authority will:
(1) Comply with Title VI of the Civil Rights Act of 1964 and all other applicable laws and regulations.
(2) Comply with the National Environmental Policy Act, 42 U.S.C. § 4321 et seq. and implementing regulations at 23 CFR Part 771 and with 23 CFR Part 774, Section 4(f).
(3) Comply with Section 106 of the National Historic Preservation Act, 54 U.S.C. 300101 et seq. and implementing regulations at 36 CFR Part 800.
(4) Evaluate the impact of facilities per Environmental Justice Executive Order 12898 (1994), DOT Order 5610.2(a) (May 2012) and FTA Circular 4703.1.
(5) Seek to avoid negative impacts on areas and neighborhoods near the facility.

(b) Where negative impacts cannot be avoided, the Authority will seek to mitigate such impacts.

**(Res. 2017-58. Passed 7-18-17.)**

[Chapter 1024 begins on Page 37]

# CHAPTER 1024
## Service Development, Approval, Implementation Process (Repealed)

EDITOR'S NOTE: Chapter 1024 was repealed by Resolution 2003-068, passed May 20, 2003.

# CHAPTER 1024
## Service Development, Approval, Implementation Process (Repealed)

EDITOR'S NOTE: Chapter 1024 was repealed by Resolution 2003-068, passed May 20, 2003.

TITLE FOUR - Miscellaneous Service Regulations

Chap. 1050. Modification in Service.
Chap. 1064. Bus Park-and-Ride Facilities Program Procedures. (Repealed)
Chap. 1066. Promotional Activities. (Repealed)
Chap. 1080. Service to Activity Centers. (Repealed)
Chap. 1082. Service to Auxiliary and Reserve Police. (Repealed)
Chap. 1084. Service to Elderly and Handicapped. (Repealed)
Chap. 1085. ADA Complementary Paratransit Plan. (Repealed)
Chap. 1086. Paratransit and Accessible Service Policy.
Chap. 1087. Transit Oriented Development.
Chap. 1088. Arts in Transit Program Policy.
Chap. 1089. Transit Waiting Environment and Community Partner Investment Programs.
Chap. 1090. Long Range Plan.
Chap. 1091. Strategic Plan.
Chap. 1092. Food and Beverage Sales Policy.
Chap. 1093. Advertising Policy.
Chap. 1094. Newspaper Dispensing Boxes Policy. (Repealed)
Chap. 1096. Commitment on Sustainability Policy.
Chap. 1098. Commitment on Environmental Policy.

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## CHAPTER 1050
## Modification in Service

1050.01 Adoption of policy. (Repealed)

### CROSS REFERENCES

Regulation of operation of systems, rates, rentals, or other charges; compliance with undertakings - see 49 U.S.C.A. 1608(d)
Charter service - see 49 C.F.R. Part 604
School bus operations - see 49 C.F.R. Part 605
Transfer of commuter services - see 49 C.F.R. Part 670
Service to auxiliary and reserve police - see VEH. & OP. 840.07; SERV. Ch. 1082
Service to activity centers - see SERV. Ch. 1080

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**1050.01 ADOPTION OF POLICY. (REPEALED)**

(EDITOR'S NOTE: Section 1050.01 was repealed by implication by Resolution 1990-70, passed 4-17-1990.)

# CHAPTER 1064
## Bus Park-and-Ride Facilities Program Procedures (Repealed)

EDITOR'S NOTE: Chapter 1064 was repealed by implication by Resolution 2003-068, passed May 20, 2003.

(Text continues on page 71)

# CHAPTER 1066
## Promotional Activities

EDITOR'S NOTE: Chapter 1066 was repealed by Resolution 2024-40, passed May 21, 2024.

# CHAPTER 1080
## Service to Activity Centers (Repealed)

EDITOR'S NOTE: Chapter 1080 was repealed by implication by Resolution 2003-068, passed May 20, 2003.

# CHAPTER 1082
## Service to Auxiliary and Reserve Police

EDITOR'S NOTE: Chapter 1082 was repealed by Resolution 1993-119, passed July 20, 1993. See Section 840.07 of the Vehicles and Operation Code.

# CHAPTER 1084
## Service to Elderly and Handicapped

EDITOR'S NOTE: Chapter 1084 was repealed by Resolution 2020-89, passed November 17, 2020. See Chapter 1086 regarding paratransit and accessible service policy.

# CHAPTER 1085
## ADA Complementary Paratransit Plan

EDITOR'S NOTE: Chapter 1085 was repealed by Resolution 2020-89, passed November 17, 2020. See Chapter 1086 regarding paratransit and accessible service policy.

# CHAPTER 1086
## Paratransit and Accessible Service Policy

1086.01 Purpose; scope.
1086.02 General policies.
1086.03 Implementation.
1086.04 Administrative procedures.

CROSS REFERENCES

Americans With Disabilities Act - see 42 U.S.C.A. 12101 et seq.
Americans with Disabilities Act Accessibility Specifications for Transportation Vehicles - see 49 C.F.R. Part 38
Transportation for elderly and handicapped persons - see 49 C.F.R. Part 609
Americans With Disabilities Act Guidance - see FTA Circular 4710.1
Topic Guides on ADA Transportation - see https://dredf.org/ADAtg/index.shtml
Fares for senior citizens and individuals with disabilities - see VEH. & OP. 840.03

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**1086.01 PURPOSE; SCOPE.**

(a) This policy is to guide Authority activities relative to its various service modes so as to culminate in full system accessibility for individuals with disabilities.

(b) The Authority's Paratransit service is a "shared ride", origin-to-destination service available for those who, due to a functional disability or condition, are unable to use the fixed-route system. Eligibility may be unconditional, temporary, or under certain conditions. Federal regulations define the ADA paratransit service area as being within three-fourths mile of a local fixed route when that route is in operation. (Res. 1991-23. Passed 1-22-91.)

(c) The Authority will provide a "shared ride" service for grandfathered Community Responsive Transit riders who were born on or before December 31, 1931.

(d) The Authority will provide a "shared ride" service for trips that are five miles or less in length for individuals who, due to a functional disability or condition, are unable to use the fixed-route system and live beyond the three-fourths mile radius. (Res. 2020-89. Passed 11-17-20.)

**1086.02 GENERAL POLICIES.**

(a) Integrated Accessible Transit Network. The continuing development of the Authority's accessible transit system should be guided by the same principles of distribution as apply to general public services. Fixed rail and bus services should be the primary service modes available to all disabled persons who are functionally

capable of using these modes. Paratransit service should supplement the fixed route network and its capacity dedicated to those persons who are unable to use the fixed route network due to their ADA recognized disability.

(b) Community Participation. The Authority's efforts to implement full accessibility should consider the interests and needs of the community through activities such as public meetings and advisory committees.
(Res. 2020-89. Passed 11-17-20.)

**1086.03 IMPLEMENTATION.**

(a) Eligibility for Paratransit service will be determined in accordance with the Americans with Disabilities Act and other applicable laws.

(b) Staff will work under administrative procedures and in compliance with current applicable laws.
(Res. 2020-89. Passed 11-17-20.)

**1086.04 ADMINISTRATIVE PROCEDURES.**

(a) The General Manager, CEO is authorized to adopt procedures to implement this policy and shall ensure that a Paratransit Customer Handbook is maintained. The Paratransit Customer Handbook shall reflect the most up-to-date administrative laws, industry best practices, FTA guidance, and Department of Justice guidance.

(b) The Paratransit Customer Handbook shall replace the ADA Complementary Paratransit Plan enacted in Resolution No. 1992-045, and subsequently revised in Resolution Nos. 1995-009, 1997-033 and 2003-140.
(Res. 2020-89. Passed 11-17-20.)

# CHAPTER 1087
## Transit Oriented Development

1087.01 Policy goals.
1087.02 Implementation; Authority.
1087.03 Existing Regulations.

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**1087.01 POLICY GOALS.**

This policy sets forth the following goals:

(a) To create high quality private or public development that is sensitive to the existing built environment;

(b) To create development that promotes and enhances transit ridership by planning uses that are "transit-oriented" and that provide maximum linkages between the GCRTA Transit Facility and the development for transit patrons, pedestrians and bicycles;

(c) To reduce auto use and congestion through encouragement of transit-linked development;

(d) To create value to GCRTA based on a fair market return on public investment, future revenue streams, additional taxes, and reduction in the cost of the site construction for GCRTA;

(e) Development that maximizes the highest and best use of the real estate based on land use and economic development goals of the surrounding community and conforming to local and regional development plans;

(f) To create value to the neighborhood, the developer and GCRTA through intensive, high quality development.

(Res. 2007-54. Passed 3-27-07.)

**1087.02 IMPLEMENTATION; AUTHORITY.**

(a) This policy further sets out the following strategy that GCRTA will work collaboratively with stakeholders and local jurisdictions (as appropriate) adjacent to its transit facilities to proactively promote and develop locations, plans and designs that maximize the benefits of the transit linkage. This effort will include community involvement and participation in the planning process.

(b) This policy provides authority to solicit proposals, accept proposals, and request funding for Joint Development activities.

(c) The policy provides direction to complete an evaluation of GCRTA real estate to maximize their economic value.
(Res. 2007-54. Passed 3-27-07.)

**1087.03 EXISTING REGULATIONS.**

This policy does not mean to alter, amend, or take precedence over applicable guidance, FTA regulations, local, state, or federal statute.
(Res. 2007-54. Passed 3-27-07.)

# CHAPTER 1088
## Arts in Transit Program Policy

1088.01 Purpose and scope.
1088.02 Policies; art projects.
1088.03 Implementation; Committee.
1088.04 Budget.
1088.05 Conflicts of interest.

CROSS REFERENCES

Approval of projects for acquisition, construction, and improvement of facilities and equipment, and payment of operating expenses; terms and conditions; regulations - see 49 U.S.C.A. 1604(d)

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**1088.01 PURPOSE AND SCOPE.**

The purpose of this policy is to guide the activities of a public art program within the Authority. This policy incorporates all forms of art media as they impact the Authority's public transportation system.
(Res. 1991-172. Passed 8-20-91; Res. 2016-73. Passed 8-16-16.)

**1088.02 POLICIES; ART PROJECTS.**

(a) Visual, functional, performing and landscape art will be incorporated into as many Authority facilities, as is possible. This includes, but is not limited to, rail stations, passenger facilities, operating facilities and passenger vehicles.

(b) All art projects will be undertaken with the cooperation of the local arts community and the neighborhood surrounding any fixed facility being considered.

(c) Selection processes that ensure fair practices among art entries and reviews will be used for all Authority public art projects.

(d) Any art project or artistic treatment undertaken pursuant to this policy will become the sole property of the Authority.

(e) The public art installations shall meet all safety standards as established by the Authority.
(Res. 1991-172. Passed 8-20-91; Res. 2002-184. Passed 11-18-02; Res. 2016-73. Passed 8-16-16.)

**1088.03 IMPLEMENTATION; COMMITTEE.**

(a) The CEO, General Manager/Secretary-Treasurer will administer an Arts in Transit Program within the Authority.

(b) Committee.

(1) The CEO, General Manager/Secretary-Treasurer will designate a committee ("Committee") of individuals with interest and expertise in the arts and humanities.

(2) Committee members will be asked to donate their time and will be paid for travel and out-of-pocket expenses consistent with established Authority policies and procedures.

(Res. 1991-172. Passed 8-20-91; Res. 2002-184. Passed 11-18-02; Res. 2016-73. Passed 8-16-16.)

**1088.04 BUDGET.**

Staffing, administration and material costs of the Arts in Transit Program will be determined through the established Authority budgeting process.

(Res. 1991-172. Passed 8-20-1991; Res. 2016-73. Passed 8-16-16.)

**1088.05 CONFLICTS OF INTEREST.**

(a) Any participant taking part in an Authority public art project, including program development, project process, focus group sessions, proposal review, or jury selection are ineligible to submit entries on Authority public art projects.

(b) All paid and non-paid artists participating in focus groups or final design sessions for identifying public art opportunities, types of mediums and developing project criteria are ineligible for submitting entries for art projects supported by their assistance during project development.

(c) Committee members and sub-committee members are ineligible to submit entries for public artwork on projects supported by their assistance during project development. Current Committee members desiring to submit artwork for any Authority public art project, must resign from the Committee for the duration of the project process. Committee members can resubmit an application for membership reconsideration six months after project completion.

(Res. 2002-184. Passed 11-18-02; Res. 2016-73. Passed 8-16-16.)

# CHAPTER 1089
## Transit Waiting Environment and Community Partner Investment Programs

1089.01 Purpose and scope.
1089.02 Transit Waiting Environment Program.
1089.03 Community Partner Investment Program.
1089.04 Maintenance of City-owned shelters.
1089.05 Administrative procedures.

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**1089.01 PURPOSE AND SCOPE.**

To improve the comfort of the Authority's passengers, make transfers easier with informational signage and provide improved passenger amenities in areas where passengers wait for the Authority's service.
(Res. 2019-35. Passed 3-26-19.)

**1089.02 TRANSIT WAITING ENVIRONMENT PROGRAM.**

(a) The General Manager, CEO may enter into agreements to provide for improvements of the areas where the Authority's passengers wait. These improvements may include new and enhanced shelters, seating, lighting, bicycle parking, trash receptacles, landscaping, enhanced information, and public art.

(b) Agreements may be funded with either Federal funds or the Authority's local funds. Agreements shall comply with all legal requirements of the funding source(s).

(c) Any agreement for an amount in excess of fifty thousand dollars ($50,000) shall be submitted to the Board of Trustees for approval.

(d) The General Manager, CEO may establish procedures to carry out this program.
(Res. 2019-35. Passed 3-26-19.)

**1089.03 COMMUNITY PARTNER INVESTMENT PROGRAM.**

(a) The General Manager, CEO may enter into agreements with a person or entity ("community partner") desiring to subsidize the cost of improvements of the areas where the Authority's passengers wait. These improvements may include new and enhanced shelters, seating, lighting, informational signage, and other amenities.

(b) The agreements may provide for the Authority to purchase enhancements and pass along the cost of those enhancements, plus a maintenance charge, to the community partner. The funds collected as maintenance charges will be accumulated and used for repairs to the Authority's shelters and upgrades to the Authority's transit waiting environments.

(c) Any agreement for an amount in excess of fifty thousand dollars ($50,000) shall be submitted to the Board of Trustees for approval.

(d) The General Manager, CEO may establish procedures to carry out this program.
(Res. 2019-35. Passed 3-26-19.)

**1089.04 MAINTENANCE OF CITY-OWNED SHELTERS.**

(a) The General Manager, CEO may enter into agreements with other political subdivisions to maintain shelters and enhancements owned by those political subdivisions.

(b) The agreements may provide for GCRTA to collect a maintenance fee.

(c) Any agreement for an amount in excess of fifty thousand dollars ($50,000) shall be submitted to the Board of Trustees for approval.
(Res. 2019-35. Passed 3-26-19.)

**1089.05 ADMINISTRATIVE PROCEDURES.**

The General Manager, CEO may establish procedures to carry out these programs.
(Res. 2019-35. Passed 3-26-19.)

# CHAPTER 1090
## Long Range Plan

EDITOR'S NOTE: This chapter, previously a Codification of Resolution 1993-81, passed April 20, 1993, which adopted Transit 2010, the Authority's Long Range Plan, was re-enacted in its entirety by Resolution 1998-23, passed February 17, 1998, which adopted a revised Long Range Plan.

Resolution 2004-162, passed December 21, 2004, adopted the Transit 2025 update.

1090.01 Adoption; purpose.
1090.02 Incorporation into the transportation plan of the Northeast Ohio Areawide Coordinating Agency.
1090.03 Amendments.
1090.04 Implementation.

CROSS REFERENCES

Affirmative Action and Disadvantaged Business Enterprise/Women's Business Enterprise Program - PERS. Ch. 620

ADA Complementary Paratransit Plan - see SERV. Ch. 1085

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**1090.01 ADOPTION; PURPOSE.**

The Greater Cleveland Regional Transit Authority's Long Range Plan shall serve as a conceptual guide for long and short-term public transit plans and improvements in Cuyahoga County.

(Res. 1998-23. Passed 2-17-98; Res. 2004-162. Passed 12-21-04; Res. 2016-74. Passed 8-16-16.)

**1090.02 INCORPORATION INTO THE TRANSPORTATION PLAN OF THE NORTHEAST OHIO AREAWIDE COORDINATING AGENCY.**

The appropriate project elements of the Long Range Plan shall be incorporated into the transit element of the region's long-range transportation plan maintained by the Northeast Ohio Areawide Coordinating Agency, the region's metropolitan planning organization.

(Res. 1998-23. Passed 2-17-98; Res. 2004-162. Passed 12-21-04.)

**1090.03 AMENDMENTS.**

The Long Range Plan shall continue to receive periodic reviews/updates in order to reflect Authority priorities in meeting the travel needs of Cuyahoga County's citizens and visitors.

(Res. 1998-23. Passed 2-17-98; Res. 2004-162. Passed 12-21-04.)

**1090.04 IMPLEMENTATION.**

The CEO, General Manager/Secretary-Treasurer may take those steps necessary to carry out the implementation of changes and improvements called for in the Long Range Plan, subject to budgetary appropriations and project authorizations by the Board of Trustees.

(Res. 1998-23. Passed 2-17-98; Res. 2004-162. Passed 12-21-04; Res. 2016-74. Passed 8-16-16.)

# CHAPTER 1091
## Strategic Plan

1091.01 Adoption; purpose.
1091.02 Implementation.
1091.03 Amendments.

CROSS REFERENCES
Affirmative Action and Disadvantaged Business Enterprise/Women's Business Enterprise Program - PERS Ch. 620
ADA Complementary Paratransit Plan - see SERV. Ch. 1085

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**1091.01 ADOPTION; PURPOSE.**

There is hereby adopted a Strategic Planning Process ("SPP") for the Authority. The SPP will result in the creation of (1) a Strategic Plan, which shall serve as a conceptual guide for budget and capital planning; and (2) a process for tracking the Authority's progress towards changes and improvements called for in the Strategic Plan.
(Res. 2016-75. Passed 8-16-16.)

**1091.02 IMPLEMENTATION.**

The CEO, General Manager/Secretary-Treasurer shall take those steps necessary to carry out the implementation of changes and improvements called for in the Strategic Plan, subject to budgetary appropriations by the Board of Trustees of the Greater Cleveland Regional Transit Authority.
(Res. 2016-75. Passed 8-16-16.)

**1091.03 AMENDMENTS.**

The Strategic Plan shall be reviewed and updated by the Executive Management Team and Board of Trustees of the Greater Cleveland Regional Transit Authority every two years.
(Res. 2016-75. Passed 8-16-16.)

# CHAPTER 1092
## Food and Beverage Sales Policy

1092.01 Purpose.
1092.02 Application.
1092.03 Policy.

CROSS REFERENCES
Misconduct involving a public transportation system - see Ohio R.C. 2917.41

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**1092.01 PURPOSE.**

The purpose of the policy set forth in this chapter is to regulate the sale of food and beverage at Authority facilities. The Authority's policy strives to balance providing customer amenities and revenue generation with increased safety and maintenance responsibilities created by such activities.
(Res. 1996-124. Passed 9-17-96; Res. 2016-91. Passed 9-27-16.)

**1092.02 APPLICATION.**

The policy set forth in this chapter shall govern the sale of food and beverages at Authority facilities. This policy shall apply to all present and future bus and rail passenger facilities, including rapid transit stations, park-n-ride lots and transit centers.
(Res. 1996-124. Passed 9-17-96; Res. 2016-91. Passed 9-27-16.)

**1092.03 POLICY.**

(a) The sale of food and beverages at Authority facilities shall be governed by the following policy:

(1) The sale of food and beverages to the general public will be allowed from lunch counters, restaurants and food service areas inside the facility that are part of the Authority structure.

(2) The sale of food and beverages from vending machines will be permitted at operating facilities for employee usage. The installation of vending machines at passenger facilities will be permitted on a case-by-case basis, as determined by the CEO, General Manager/Secretary-Treasurer.

(3) All lessees and/or licensees of Authority facilities which operate as a food service must post signs at the point of vending or cash register and exit door(s) that the consumption of food and beverages on Authority vehicles or within posted areas of passenger facilities is prohibited by law.

(4) The sale of food and beverages to the general public from cars, vans, wagons, movable stands, etc. at Authority passenger facilities, may be permitted on a case by case basis, as determined by the CEO, General Manager/Secretary-Treasurer.

(b) The consumption of food and/or beverages in areas where they are clearly marked as being prohibited is a criminal offense of misconduct involving a public transportation system, pursuant to Ohio R.C. 2917.41.

(Res. 1996-124. Passed 9-17-96; Res. 2016-91. Passed 9-27-16.)

# CHAPTER 1093
# Advertising Policy

1093.01 Advertising on Authority Property

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## 1093.01 ADVERTISING ON AUTHORITY PROPERTY.

(a) The Authority seeks to support a healthy and vibrant community through its brand and advertising. The Authority intends to maintain a safe and welcoming environment for all Authority passengers and members of the community, including minors, without regard to race, color, marital status, sexual orientation, religion, national origin, ancestry, age, sex, gender identity, disability, medical condition, or military status.

(b) The Authority will maintain a professional advertising environment in all advertising spaces, including physical, audio and digital spaces, and manage the advertising program in a manner that will ensure that advertising: (1) does not discourage the use of or disrupt the operation of the transit system, (2) does not diminish the Authority's reputation in the community or the goodwill of its passengers, (3) does not express an opinion, that might be attributed to the Authority, regarding political, religious or other issues that are the subject of public debate, (4) protects passengers, bystanders, employees, vehicles, facilities, and other equipment from physical harm, (5) aids the Authority in retaining current and building new transit ridership, and (6) is consistent with its Mission.

(c) The Authority's advertising space is a non-public forum, which means that it has not been traditionally open to speech and debate in the same manner as public parks and city streets have been.

(d) The Authority will permit the following types of advertising: (1) commercial advertising; (2) advertising related to the Authority's transit operations; (3) paid or unpaid public service announcements and (4) paid political advertising.

(e) The Authority will not permit the following types of advertising: (1) advertising that contains material that discriminates on the basis of race, color, marital status, sexual orientation, religion, national origin, ancestry, age, sex, gender identity, disability, medical condition, or military status; (2) alcohol, marijuana, tobacco products and related products and services; (3) profanity; (4) violence; (5)

unlawful goods, services or conduct; (6) sexual activity, products or sexually-oriented services; (7) firearms; (8) gambling; (9) unauthorized endorsements; (10) false, misleading, libelous or deceptive advertising; (11) copyright infringements, trademark violations or otherwise unlawful advertising; (12) advertising tending to impede transit safety or disrupt traffic; (13) unclear identification of the advertiser; and (14) unpaid advertising.

(f) The Authority will determine the interior and exterior spaces that will serve as appropriate locations for all advertising. The Authority reserves the right to modify, change, or alter the locations and sizes of the available advertisement spaces. The placement and size of any advertisement shall be at the sole discretion of the Authority.

(g) The Authority may, at the sole discretion of the General Manager, Chief Executive Officer, cause to be removed any advertising that does not conform to this Policy.

(h) The General Manager, Chief Executive Officer is authorized to issue and amend procedures to implement this policy without further approval of the Board of Trustees.
(Res. 2023-44. Passed 6-27-23.)

# CHAPTER 1094
## Newspaper Dispensing Boxes Policy

EDITOR'S NOTE: Chapter 1094 was repealed by Resolution 2024-40, passed May 21, 2024.

[Chapter 1096 begins on Page 99]

# CHAPTER 1096
## Commitment on Sustainability Policy

1096.01 Policy statement. 1096.02 Application of Policy.

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**1096.01 POLICY STATEMENT.**

(a) The following sustainability statement and commitments were developed to evolve best practices on sustainability at the Greater Cleveland Regional Transit Authority (GCRTA).

(b) The Authority is committed to protecting the environment as it provides public transit services to northeast Ohio. We will provide sound business practices that integrate sustainable principles throughout every level of operation to create a healthier and livable environment for our customers and the community we serve. We will strive to provide the following environmental commitments:

(1) Communicate and advance the use of environmental practices throughout GCRTA.

(2) Make environmental concerns an integral part of planning and decision-making processes and implement effective environmental programs.

(3) Reduce greenhouse gas emissions and increase energy efficiencies throughout its transit operations and facilities.

(4) Prevent pollution and conserve resources by reducing waste, creating better disposal options, recycling and procure new and better products and technologies.

(5) Educate the community and our customers on the environmental benefits of public transit, and encourage biking, walking, carpooling and van pooling.

(6) Provide quality sustainable public spaces and amenities around our transit stations and bus shelters to promote walking and bicycle accessibility for link trip options.

(7) Encourage the use of transit as a viable, environmentally friendly, sustainable commuting choice.

(8) Incorporate sustainability and green building principles throughout the planning, design, construction and operations of our facilities.

(9) Continue to explore and implement renewable energy solutions to reduce energy consumptions at our facilities.

(10) Adhere to all State and Federal EPA regulations, standards and monitoring methods regarding environmental quality.
(Res. 2010-67. Passed 9-21-10.)

**1096.02 APPLICATION OF POLICY.**

This Policy applies to all employees, departments and facilities throughout the Authority. Participation of everyone is required in order to meet the commitments set forth in this Policy.
(Res. 2010-67. Passed 9-21-10.)

# CHAPTER 1098
## Commitment on Environmental Policy

1098.01 Policy statement. 1098.02 Application of Policy.

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**1098.01 POLICY STATEMENT.**

GCRTA is committed to protecting the environment as it provides public transit services to Northeast Ohio. The Authority utilizes sound business practices that measure and improve our environmental and sustainability performance and makes the following environmental commitments:

(a) Communicate and advance the use of environmental practices throughout GCRTA.

(b) Comply with all applicable local, state, federal, and other environmental laws, regulations, standards and monitoring requirements.

(c) Incorporating environmental responsibility into business operations by planning for environmental protection, reviewing and developing policies, providing resources, setting targets, and reviewing and auditing performance.

(d) Prevention of pollution and conservation of resources, by reducing energy and water consumption, increasing reuse and recycling, and procuring sustainable products and technologies.

(Res. 2013-108. Passed 10-22-13; Res. 2014-110. Passed 10-21-14; Res. 2017-101. Passed 11-21-17; Res. 2019-123. Passed 12-17-19; Res. 2023-79. Passed 9-26-23.)

**1098.02 APPLICATION OF POLICY.**

This policy applies to all employees, departments and functions throughout the Authority. Full participation by all staff is required in order to meet the commitments set forth in this policy. This policy will be communicated to all persons, including contractors and vendors, working for or on behalf of GCRTA.

(Res. 2013-108. Passed 10-22-13; Res. 2014-110. Passed 10-21-14; Res. 2017-101. Passed 11-21-17; Res. 2023-79. Passed 9-26-23.)

Greater Cleveland
Regional Transit Authority

# Fiscal Year 2025
# Service Management Plan

November 19, 2024

Operations Division
Service Management Department

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## Section 1: Introduction

The FY 2025 Service Management Plan (SMP) is a companion document to the recommended 2025 Operating and Capital Budget. As required by policy, the SMP reports the current performance of all RTA bus routes and outlines plans for service levels and service changes anticipated in 2025. This year's report presents route performance in the first two quarters (first half) of 2024.

See charts in Appendix

## Section 2: Plans for 2025

The recommended 2025 budget will enable RTA to sustain the year-end 2024 service level through 2025.

Service plans for 2025 include the following elements:

1. Staff will continue to monitor the system performance and make minor adjustments.
2. Service resources will be reallocated to offset detours and delays due to building, road, and bridge construction projects.
3. Temporary service will be operated to support rail construction projects and major special events.
4. Staff will continue to adjust bus stops to improve safety and informational signs.
5. Staff will continue working to improve transit waiting environments at high-usage bus stops and along priority corridors designated in the Strategic Plan.
6. Even where a shelter may not be warranted, staff will seek to improve stop conditions with concrete landing pads to benefit all riders, especially for riders with mobility impairments.
7. Staff will develop prioritization of frequency improvements to be implemented as budget permits.
8. Efforts to improve systemwide service reliability will continue.
9. The plan does not call for an increase in budgeted hours and miles.

## Section 3: Bus Route Performance Summary

Each year, the Service Management Plan includes an analysis of bus route productivity. RTA uses five indicators to measure route productivity:

- Boardings per revenue vehicle hour
- Boardings per revenue vehicle trip
- Boardings per revenue vehicle mile
- Boardings per total vehicle hour
- Boardings per total vehicle mile

To provide fair comparisons of route performance, bus routes are compared with other routes in the same category of service. The categories are:

- Radial – local routes operating to and from downtown.
- Crosstown/Feeder – routes that do not travel downtown, but typically connect with radial bus routes or rapid transit.
- Park-N-Ride – service operating on freeways between park-n-ride lots and downtown during rush hours.
- Downtown Trolley – local service traveling entirely within the downtown area.

Policy requires that the Service Management Plan include analysis of current bus route performance. Service statistics recorded between January 1 and June 30, 2024, were used to analyze current bus route performance.

## Section 4: Bus Routes in the Bottom Quartile of Their Route Category

By policy, RTA staff must identify every route whose utilization, in boardings per revenue vehicle hour (B/VH), is low in relation to other routes in its route category. Routes in the bottom quartile of each route category are listed below. The number in parentheses next to each route is the number of boardings per "revenue vehicle hour" (i.e., in-service vehicle hour) for the route. Detailed route performance statistics are included in the Appendix.

| Radial (Category Average = 19) | Crosstown/Feeder (Category Avg. = 15) |
|---|---|
| #55/55B/55C Cleveland State Line (13) | #83 Warren - W.130 (9) |
| #71 Pearl - Tiedeman (12) | #86 Rocky River Dr - Bagley (9) |
| #90 Broadway - Libby (11) | #54 Brookpark - Rockside (8) |
| #8 Cedar - Buckeye (10) | #34 E. 200 - Green (8) |
| #77 Brecksville (6) | #35 Lee – E 123 (7) |

## Appendix - Route Performance Tables

**Total Radial Route Performance**
**From 1/1/24 through 6/30/24**
**Sorted by Boardings per Revenue Hour**

| | Ridership by Route | | Vehicle Statistics | | | | | Route Performance Indicators | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Route | Boardings | % Contribution | Revenue Trips | Revenue Hours | Revenue Miles | Total Hours | Total Miles | Boardings per Revenue Trip | Boardings per Revenue Hour | Boardings per Revenue Mile | Boardings per Total Hour | Boardings per Total Mile |
| HealthLine | 994,362 | 15.4% | 30,576 | 23,754 | 208,242 | 23,937 | 209,316 | 32.5 | 41.9 | 4.8 | 41.5 | 4.8 |
| 3 Superior | 419,920 | 6.5% | 22,524 | 15,786 | 155,611 | 15,905 | 156,430 | 18.6 | 26.6 | 2.7 | 26.4 | 2.7 |
| 22 Lorain | 522,624 | 8.1% | 22,165 | 23,622 | 264,584 | 24,832 | 281,317 | 23.6 | 22.1 | 2.0 | 21.2 | 1.9 |
| 1 St. Clair | 324,440 | 5.0% | 21,824 | 15,921 | 160,259 | 16,344 | 174,766 | 14.8 | 20.4 | 1.9 | 19.9 | 1.9 |
| 9 Mayfield - Hough | 367,158 | 5.7% | 14,038 | 18,626 | 228,692 | 19,502 | 250,067 | 26.2 | 19.7 | 1.6 | 18.8 | 1.5 |
| 51/51A MetroHealth Line | 478,813 | 7.4% | 23,410 | 24,373 | 310,809 | 25,700 | 337,320 | 20.5 | 19.6 | 1.5 | 18.6 | 1.4 |
| 14/14A Kinsman | 534,644 | 8.3% | 23,184 | 28,320 | 354,033 | 30,007 | 385,232 | 23.1 | 18.9 | 1.5 | 17.8 | 1.4 |
| 11 Quincy - Cedar | 311,856 | 4.8% | 14,076 | 16,549 | 184,210 | 17,317 | 198,944 | 22.2 | 18.8 | 1.7 | 18.0 | 1.6 |
| 19/19A/19B Broadway | 450,880 | 7.0% | 23,189 | 27,299 | 351,172 | 29,092 | 382,132 | 19.4 | 16.5 | 1.3 | 15.5 | 1.2 |
| 26/26A Detroit | 434,428 | 6.7% | 21,824 | 26,734 | 329,503 | 27,812 | 345,997 | 19.8 | 16.2 | 1.3 | 15.7 | 1.3 |
| 15 Union - Harvard | 399,443 | 6.2% | 20,818 | 25,474 | 298,512 | 27,193 | 327,013 | 19.4 | 15.7 | 1.3 | 14.7 | 1.2 |
| 45 Ridge - Fulton | 208,405 | 3.2% | 12,652 | 13,924 | 156,897 | 14,837 | 171,331 | 16.5 | 15.0 | 1.3 | 14.2 | 1.2 |
| 25 Madison - Clark | 241,553 | 3.7% | 13,737 | 17,924 | 209,724 | 18,600 | 220,451 | 17.6 | 13.5 | 1.2 | 13.0 | 1.1 |
| 39 Lakeshore | 47,539 | 0.7% | 3,328 | 3,554 | 36,953 | 4,414 | 76,072 | 14.3 | 13.4 | 0.8 | 10.8 | 0.6 |
| 53/53A MetroHealth - Broadview | 104,648 | 1.6% | 8,176 | 8,042 | 126,508 | 9,028 | 156,507 | 12.8 | 13.0 | 0.8 | 11.6 | 0.7 |
| 55/55B/55C Cleveland State Line | 224,421 | 3.5% | 12,656 | 17,842 | 283,475 | 19,991 | 317,005 | 17.7 | 12.6 | 0.9 | 11.2 | 0.7 |
| 71 Pearl - Tiedeman | 155,583 | 2.4% | 9,300 | 13,237 | 187,385 | 14,265 | 209,032 | 16.7 | 11.8 | 0.8 | 10.9 | 0.7 |
| 90 Broadway - Libby | 142,977 | 2.2% | 10,778 | 13,085 | 230,017 | 13,886 | 251,758 | 13.3 | 10.9 | 0.6 | 10.3 | 0.6 |
| 8 Cedar - Buckeye | 37,583 | 0.6% | 5,716 | 5,576 | 45,778 | 5,822 | 50,569 | 10.1 | 10.3 | 1.3 | 9.9 | 1.1 |
| 77 Brecksville | 30,648 | 0.5% | 8,128 | 7,651 | 156,413 | 8,648 | 178,845 | 6.3 | 6.4 | 0.3 | 5.9 | 0.3 |
| Total | 6,472,205 | 100.0% | 322,095 | 347,573 | 4,289,777 | 366,536 | 4,688,104 | 20.1 | 18.8 | 1.5 | 17.7 | 1.4 |

## Appendix - Route Performance Tables

**Total Crosstown/Feeder Route Performance**
**From 1/1/24 through 6/30/24**
**Sorted by Boardings per Revenue Hour**

| | Ridership by Route | | Vehicle Statistics | | | | | Route Performance Indicators | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Route | Boardings | % Contribution | Revenue Trips | Revenue Hours | Revenue Miles | Total Hours | Total Miles | Boardings per Revenue Trip | Boardings per Revenue Hour | Boardings per Revenue Mile | Boardings per Total Hour | Boardings per Total Mile |
| 28/28A Euclid | 350,864 | 11.9% | 24,186 | 16,069 | 172,096 | 16,247 | 174,109 | 14.5 | 21.8 | 2.0 | 21.6 | 2.0 |
| 10 E.10S - Lakeshore | 650,376 | 22.0% | 23,872 | 31,071 | 388,674 | 32,680 | 414,430 | 27.5 | 20.9 | 1.7 | 19.9 | 1.6 |
| 41/41F Warrensville | 486,009 | 16.5% | 17,373 | 24,881 | 344,275 | 25,791 | 365,910 | 28.6 | 20.1 | 1.4 | 19.2 | 1.4 |
| 16 E.55 | 68,517 | 2.3% | 4,209 | 4,129 | 46,105 | 4,394 | 52,355 | 16.3 | 16.8 | 1.5 | 15.8 | 1.3 |
| 31 St. Clair - Babbitt | 175,025 | 5.9% | 14,380 | 10,870 | 121,451 | 10,746 | 121,874 | 12.2 | 16.4 | 1.4 | 16.3 | 1.4 |
| 40 Lakeview - Lee | 192,062 | 6.5% | 11,832 | 13,311 | 161,719 | 13,868 | 170,097 | 16.5 | 14.4 | 1.2 | 13.8 | 1.1 |
| 37 Hayden - E.185 | 104,099 | 3.5% | 10,796 | 8,003 | 88,836 | 8,071 | 89,075 | 9.7 | 13.1 | 1.2 | 13.0 | 1.2 |
| 78 W.117 - Puritas | 159,300 | 5.4% | 12,780 | 12,584 | 145,876 | 13,069 | 151,507 | 12.5 | 12.7 | 1.1 | 12.2 | 1.1 |
| 48 E.131 | 171,278 | 5.8% | 14,512 | 14,099 | 131,575 | 14,843 | 141,356 | 11.8 | 12.1 | 1.3 | 11.5 | 1.2 |
| 94 E.260 - Richmond | 75,881 | 2.6% | 5,780 | 6,875 | 95,002 | 7,243 | 102,258 | 13.1 | 11.0 | 0.8 | 10.5 | 0.7 |
| 2 E.79 | 38,718 | 1.3% | 3,840 | 3,783 | 46,481 | 3,970 | 52,011 | 10.1 | 10.2 | 0.8 | 9.8 | 0.7 |
| 50 E.116 | 51,853 | 1.7% | 5,480 | 5,382 | 53,874 | 5,662 | 56,885 | 9.4 | 9.6 | 1.0 | 9.1 | 0.9 |
| 18 W.98 - Garfield | 93,875 | 3.2% | 7,098 | 10,177 | 119,488 | 10,475 | 125,973 | 13.2 | 9.2 | 0.8 | 9.0 | 0.7 |
| 7/7A Monticello | 68,388 | 2.3% | 10,412 | 7,481 | 90,448 | 7,885 | 93,434 | 6.6 | 9.1 | 0.8 | 8.9 | 0.7 |
| 83 Warren - W.130 | 104,333 | 3.5% | 11,762 | 11,526 | 161,893 | 12,067 | 171,017 | 8.9 | 9.1 | 0.6 | 8.6 | 0.6 |
| 86 Rocky River Dr - Bagley | 48,009 | 1.6% | 5,460 | 5,389 | 85,316 | 5,646 | 90,563 | 8.8 | 8.9 | 0.6 | 8.5 | 0.5 |
| 54 Brookpark - Rockside | 45,749 | 1.5% | 5,824 | 5,714 | 77,153 | 6,084 | 84,787 | 7.9 | 8.0 | 0.6 | 7.5 | 0.5 |
| 34 E.200 - Green | 33,055 | 1.1% | 3,968 | 4,425 | 55,678 | 4,606 | 59,159 | 8.3 | 7.5 | 0.6 | 7.2 | 0.6 |
| 35 Lee - E.123 | 25,309 | 0.9% | 4,864 | 3,454 | 30,903 | 3,402 | 31,128 | 5.2 | 7.3 | 0.8 | 7.2 | 0.8 |
| Total | 2,953,188 | 100.0% | 198,030 | 198,811 | 2,414,465 | 206,669 | 2,549,008 | 14.9 | 14.9 | 1.2 | 14.3 | 1.2 |

## Appendix - Route Performance Tables

**Total Route Performance by Route Category**
**From 1/1/24 through 6/30/24**
**No Sorting**

| | Ridership by Route | | Vehicle Statistics | | | | | Route Performance Indicators | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Route Category | Boardings | % Contribution | Revenue Trips | Revenue Hours | Revenue Miles | Total Hours | Total Miles | Boardings per Revenue Trip | Boardings per Revenue Hour | Boardings per Revenue Mile | Boardings per Total Hour | Boardings per Total Mile |
| Radial | 6,472,205 | 68.0% | 322,095 | 347,575 | 4,280,777 | 366,536 | 4,666,104 | 20.1 | 18.6 | 1.5 | 17.7 | 1.4 |
| Crosstown/Feeder | 2,953,188 | 31.0% | 198,030 | 198,811 | 2,414,465 | 206,669 | 2,549,008 | 14.9 | 14.9 | 1.2 | 14.3 | 1.2 |
| 251 Strongsville Park-n-Ride | 25,961 | 0.3% | 1,536 | 1,448 | 34,946 | 2,734 | 71,885 | 16.9 | 17.9 | 0.7 | 9.5 | 0.4 |
| B-Line Trolley | 42,332 | 0.4% | 12,928 | 3,190 | 17,766 | 3,380 | 21,459 | 3.3 | 13.3 | 2.4 | 12.5 | 2.0 |
| Uncategorized and Misc. | 31,148 | 0.3% | 4,056 | 1,793 | 21,922 | 1,842 | 22,860 | 7.7 | 17.4 | 1.4 | 16.9 | 1.4 |
| Total | 9,524,834 | 100.0% | 538,645 | 552,817 | 6,778,876 | 581,161 | 7,353,116 | 17.7 | 17.2 | 1.4 | 16.4 | 1.3 |

*Note: Uncategorized and Misc. primarily refers to rail replacement bus service for Red/Blue/Green Lines*

**Table Identifying Each Tract with its Minority/Non-Minority and Low-Income/Non-Low-Income Composition**

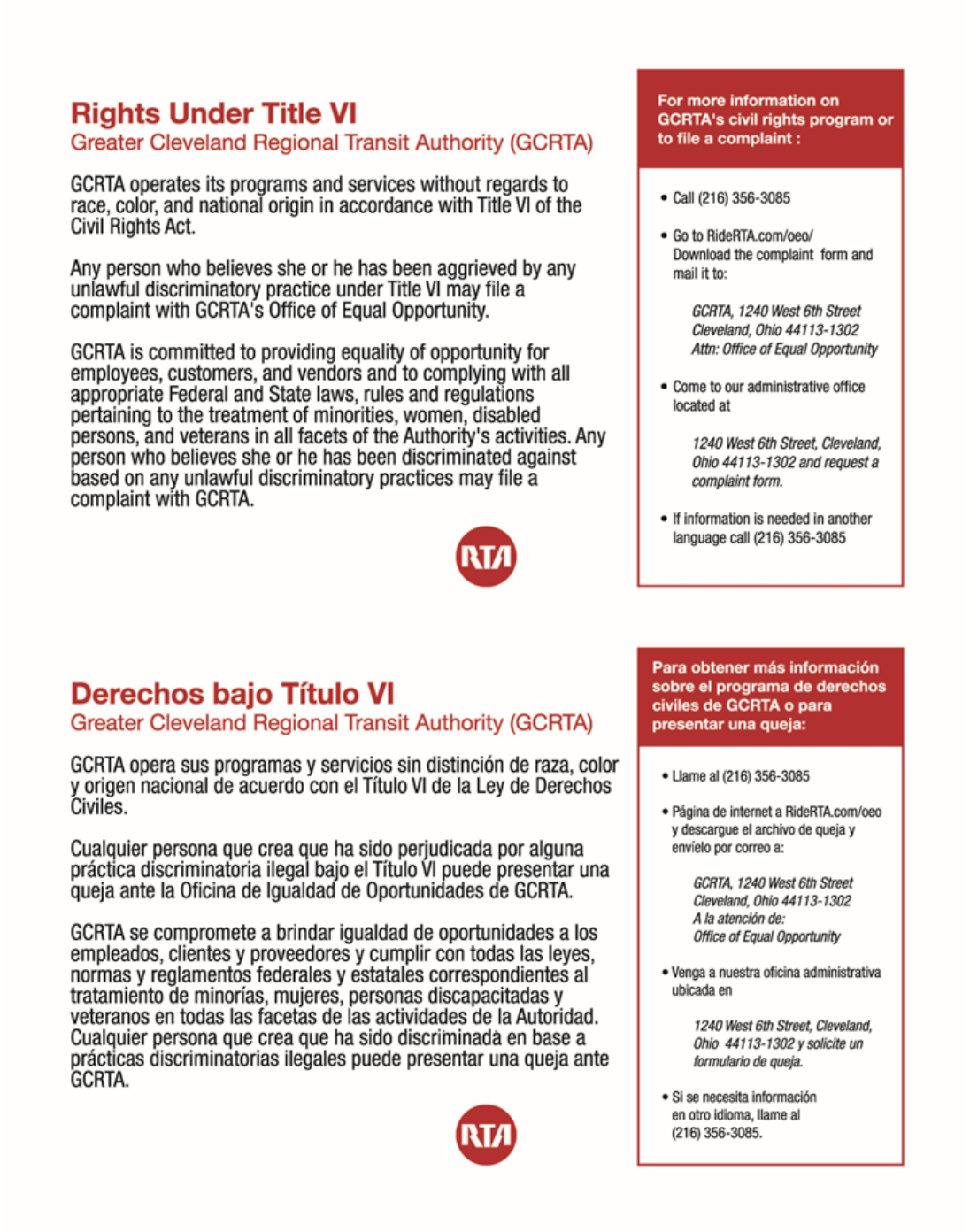
| STATEFP | COUNTYFP | TRACTCE | GEOID | NAME | NAMELSAD | Per_LOW | LOWINCOME | Per_MIN | MINORITY | MINLOW | Shape_Length | Shape_Area |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 39 | 035 | 175109 | 39035175109 | 1751.09 | Census Tract 1751.09 | 6.4 | NON_LOW | 6.4 | NONMIN | NON_MINLOW | 0.082065898 | 0.000387115 |
| 39 | 035 | 175110 | 39035175110 | 1751.10 | Census Tract 1751.10 | 18 | NON_LOW | 18 | NONMIN | NON_MINLOW | 0.103823243 | 0.000597248 |
| 39 | 035 | 190506 | 39035190506 | 1905.06 | Census Tract 1905.06 | 21.6 | NON_LOW | 21.6 | NONMIN | NON_MINLOW | 0.212424182 | 0.001027139 |
| 39 | 035 | 172105 | 39035172105 | 1721.05 | Census Tract 1721.05 | 50.4 | LOW | 50.4 | MIN | MINLOW | 0.03884863 | 8.3397E-05 |
| 39 | 035 | 152605 | 39035152605 | 1526.05 | Census Tract 1526.05 | 79.6 | LOW | 79.6 | MIN | MINLOW | 0.104652443 | 0.000438629 |
| 39 | 035 | 160604 | 39035160604 | 1606.04 | Census Tract 1606.04 | 16.4 | LOW | 16.4 | NONMIN | MINLOW | 0.045093268 | 0.000100694 |
| 39 | 035 | 136104 | 39035136104 | 1361.04 | Census Tract 1361.04 | 27.8 | NON_LOW | 27.8 | NONMIN | NON_MINLOW | 0.133046497 | 0.000839915 |
| 39 | 035 | 197700 | 39035197700 | 1977 | Census Tract 1977 | 44.5 | LOW | 44.5 | MIN | MINLOW | 0.05725866 | 0.000180908 |
| 39 | 035 | 197800 | 39035197800 | 1978 | Census Tract 1978 | 20.6 | NON_LOW | 20.6 | NONMIN | NON_MINLOW | 0.094480919 | 0.000229802 |
| 39 | 035 | 197600 | 39035197600 | 1976 | Census Tract 1976 | 74.8 | LOW | 74.8 | MIN | MINLOW | 0.051649542 | 0.000108236 |
| 39 | 035 | 196800 | 39035196800 | 1968 | Census Tract 1968 | 49.6 | LOW | 49.6 | MIN | MINLOW | 0.074901233 | 0.000226512 |
| 39 | 035 | 197900 | 39035197900 | 1979 | Census Tract 1979 | 55.8 | LOW | 55.8 | MIN | MINLOW | 0.089810095 | 0.000211426 |
| 39 | 035 | 197400 | 39035197400 | 1974 | Census Tract 1974 | 45 | LOW | 45 | MIN | MINLOW | 0.056796309 | 0.000157962 |
| 39 | 035 | 136105 | 39035136105 | 1361.05 | Census Tract 1361.05 | 17.3 | NON_LOW | 17.3 | NONMIN | NON_MINLOW | 0.109253069 | 0.000657561 |
| 39 | 035 | 198400 | 39035198400 | 1984 | Census Tract 1984 | 96.4 | LOW | 96.4 | MIN | MINLOW | 0.075060096 | 0.000242467 |
| 39 | 035 | 198900 | 39035198900 | 1989 | Census Tract 1989 | 70.6 | LOW | 70.6 | MIN | MINLOW | 0.03942251 | 7.02105E-05 |
| 39 | 035 | 197100 | 39035197100 | 1971 | Census Tract 1971 | 40.5 | NON_LOW | 40.5 | NONMIN | NON_MINLOW | 0.162627176 | 0.001158815 |
| 39 | 035 | 101201 | 39035101201 | 1012.01 | Census Tract 1012.01 | 34 | LOW | 34 | NONMIN | MINLOW | 0.042094303 | 7.36115E-05 |
| 39 | 035 | 198000 | 39035198000 | 1980 | Census Tract 1980 | 71.2 | LOW | 71.2 | MIN | MINLOW | 0.071092405 | 0.000216042 |
| 39 | 035 | 160603 | 39035160603 | 1606.03 | Census Tract 1606.03 | 25.4 | NON_LOW | 25.4 | NONMIN | NON_MINLOW | 0.034335305 | 2.66317E-05 |
| 39 | 035 | 197300 | 39035197300 | 1973 | Census Tract 1973 | 45.9 | NON_LOW | 45.9 | MIN | MINLOW | 0.049113595 | 9.79498E-05 |
| 39 | 035 | 197500 | 39035197500 | 1975 | Census Tract 1975 | 37 | LOW | 37 | NONMIN | MINLOW | 0.058964055 | 0.000143984 |
| 39 | 035 | 199200 | 39035199200 | 1992 | Census Tract 1992 | 100 | LOW | 100 | MIN | MINLOW | 0.053152838 | 8.42348E-05 |
| 39 | 035 | 199000 | 39035199000 | 1990 | Census Tract 1990 | 95.8 | LOW | 95.8 | MIN | MINLOW | 0.043926313 | 8.12108E-05 |
| 39 | 035 | 117203 | 39035117203 | 1172.03 | Census Tract 1172.03 | 85.8 | LOW | 85.8 | MIN | MINLOW | 0.036101422 | 5.88815E-05 |
| 39 | 035 | 197200 | 39035197200 | 1972 | Census Tract 1972 | 89.7 | LOW | 89.7 | MIN | MINLOW | 0.093245159 | 0.000272843 |
| 39 | 035 | 198100 | 39035198100 | 1981 | Census Tract 1981 | 79.5 | LOW | 79.5 | MIN | MINLOW | 0.037902228 | 7.12833E-05 |
| 39 | 035 | 198700 | 39035198700 | 1987 | Census Tract 1987 | 97.7 | LOW | 97.7 | MIN | MINLOW | 0.053463211 | 0.000130738 |
| 39 | 035 | 198800 | 39035198800 | 1988 | Census Tract 1988 | 91.2 | LOW | 91.2 | MIN | MINLOW | 0.045756511 | 8.63403E-05 |
| 39 | 035 | 161900 | 39035161900 | 1619 | Census Tract 1619 | 9.4 | LOW | 9.4 | NONMIN | MINLOW | 0.048874482 | 0.000100136 |
| 39 | 035 | 114800 | 39035114800 | 1148 | Census Tract 1148 | 99.3 | LOW | 99.3 | MIN | MINLOW | 0.057619313 | 0.000135191 |
| 39 | 035 | 198500 | 39035198500 | 1985 | Census Tract 1985 | 98.2 | LOW | 98.2 | MIN | MINLOW | 0.057164769 | 0.000149892 |
| 39 | 035 | 198600 | 39035198600 | 1986 | Census Tract 1986 | 89 | LOW | 89 | MIN | MINLOW | 0.068849739 | 0.000211746 |
| 39 | 035 | 198200 | 39035198200 | 1982 | Census Tract 1982 | 95.6 | LOW | 95.6 | MIN | MINLOW | 0.119397244 | 0.000424646 |
| 39 | 035 | 199300 | 39035199300 | 1993 | Census Tract 1993 | 97.6 | LOW | 97.6 | MIN | MINLOW | 0.077218213 | 0.000138327 |
| 39 | 035 | 175107 | 39035175107 | 1751.07 | Census Tract 1751.07 | 7 | NON_LOW | 7 | NONMIN | NON_MINLOW | 0.104595919 | 0.000654096 |
| 39 | 035 | 131105 | 39035131105 | 1311.05 | Census Tract 1311.05 | 41.6 | NON_LOW | 41.6 | NONMIN | NON_MINLOW | 0.120786969 | 0.000489804 |
| 39 | 035 | 981000 | 39035981000 | 9810 | Census Tract 9810 | 0 | NON_LOW | 0 | NONMIN | NON_MINLOW | 0.125493014 | 0.000359368 |
| 39 | 035 | 175108 | 39035175108 | 1751.08 | Census Tract 1751.08 | 26.7 | NON_LOW | 26.7 | NONMIN | NON_MINLOW | 0.058137389 | 0.00016416 |
| 39 | 035 | 199100 | 39035199100 | 1991 | Census Tract 1991 | 96.4 | LOW | 96.4 | MIN | MINLOW | 0.042103479 | 9.06947E-05 |
| 39 | 035 | 172104 | 39035172104 | 1721.04 | Census Tract 1721.04 | 62.6 | NON_LOW | 62.6 | MIN | MINLOW | 0.041841653 | 8.79518E-05 |
| 39 | 035 | 198300 | 39035198300 | 1983 | Census Tract 1983 | 91.6 | LOW | 91.6 | MIN | MINLOW | 0.139397764 | 0.000767045 |
| 39 | 035 | 197000 | 39035197000 | 1970 | Census Tract 1970 | 93.2 | NON_LOW | 93.2 | MIN | MINLOW | 0.122572512 | 0.000594353 |
| 39 | 035 | 190505 | 39035190505 | 1905.05 | Census Tract 1905.05 | 17.8 | NON_LOW | 17.8 | NONMIN | NON_MINLOW | 0.141810521 | 0.000841015 |
| 39 | 035 | 980200 | 39035980200 | 9802 | Census Tract 9802 | #VALUE! | NON_LOW | | NONMIN | NON_MINLOW | 0.061278391 | 0.000202264 |
| 39 | 035 | 980900 | 39035980900 | 9809 | Census Tract 9809 | #VALUE! | NON_LOW | | NONMIN | NON_MINLOW | 0.068688821 | 0.000118629 |

# GCRTA Title VI Route Analysis

| Bus Route | MINLOW | Vehicle Age | OTP Early | OTP On-Time | OTP Late | Peak Headway | Midday Headway |
|---|---|---|---|---|---|---|---|
| 1 | MINLOW | 7.9 | 1.60% | 90.30% | 8.10% | 15 | 15 |
| 2 | MINLOW | 8.5 | 1.80% | 83.00% | 15.10% | 60 | 60 |
| 3 | MINLOW | 7.8 | 1.70% | 86.80% | 11.50% | 15 | 15 |
| 6 | MINLOW | 4.0 | 1.30% | 89.00% | 9.70% | 15 | 15 |
| 7 | MINLOW | 7.9 | 1.10% | 93.50% | 5.40% | 30 | 30 |
| 8 | MINLOW | 8.5 | 1.20% | 88.00% | 10.90% | 60 | 60 |
| 9 | MINLOW | 7.8 | 1.30% | 71.70% | 27.00% | 30 | 30 |
| 10 | MINLOW | 7.9 | 1.70% | 82.70% | 15.70% | 15 | 15 |
| 11 | MINLOW | 7.7 | 1.00% | 70.50% | 28.50% | 30 | 30 |
| 14 | MINLOW | 7.8 | 2.20% | 73.30% | 24.50% | 15 | 15 |
| 15 | MINLOW | 7.8 | 2.60% | 82.20% | 15.20% | 15 | 15 |
| 16 | MINLOW | 8.2 | 0.80% | 87.20% | 12.00% | 30 | 30 |
| 18 | MINLOW | 7.8 | 1.50% | 76.80% | 21.70% | 60 | 60 |
| 19 | MINLOW | 7.7 | 1.30% | 80.60% | 18.10% | 15 | 15 |
| 22 | MINLOW | 7.2 | 1.20% | 76.60% | 22.20% | 15 | 15 |
| 25 | MINLOW | 7.0 | 1.60% | 79.70% | 18.70% | 30 | 30 |
| 26 | NON-MINLOW | 7.4 | 1.10% | 73.80% | 25.10% | 15 | 15 |
| 28 | MINLOW | 7.9 | 1.90% | 92.90% | 5.20% | 15 | 15 |
| 31 | MINLOW | 8.0 | 1.10% | 92.40% | 6.50% | 30 | 30 |
| 34 | MINLOW | 7.6 | 2.60% | 87.40% | 10.00% | 60 | 60 |
| 35 | MINLOW | 7.8 | 0.20% | 92.30% | 7.50% | 45 | 45 |
| 37 | MINLOW | 7.9 | 1.50% | 93.00% | 5.50% | 30 | 30 |
| 39 | MINLOW | 7.6 | 1.60% | 90.20% | 8.10% | 30 | |
| 40 | MINLOW | 7.9 | 1.20% | 84.10% | 14.70% | 30 | 30 |
| 41 | MINLOW | 7.9 | 1.70% | 78.50% | 19.80% | 30 | 30 |
| 45 | MINLOW | 7.3 | 3.60% | 84.60% | 11.80% | 30 | 30 |
| 48 | MINLOW | 8.0 | 2.90% | 87.80% | 9.30% | 30 | 30 |
| 50 | MINLOW | 7.9 | 2.20% | 88.80% | 9.00% | 60 | 60 |
| 51 | MINLOW | 3.2 | 1.30% | 79.20% | 19.50% | 15 | 15 |
| 53 | NON-MINLOW | 3.3 | 1.60% | 86.10% | 12.30% | 30 | 60 |
| 54 | NON-MINLOW | 8.3 | 2.10% | 89.10% | 8.80% | 60 | 60 |
| 55 | NON-MINLOW | 8.6 | 1.60% | 78.30% | 20.10% | 15 | 30 |
| 62 | MINLOW | 10.0 | 0.50% | 88.80% | 10.70% | 15 | 15 |
| 71 | MINLOW | 6.7 | 2.70% | 82.00% | 15.40% | 30 | 30 |
| 77 | NON-MINLOW | 5.6 | 2.60% | 80.90% | 16.50% | 30 | 60 |
| 78 | MINLOW | 7.8 | 1.70% | 84.20% | 14.10% | 30 | 30 |
| 83 | MINLOW | 7.4 | 1.30% | 84.70% | 14.00% | 30 | 30 |
| 86 | MINLOW | 7.4 | 0.80% | 77.10% | 22.10% | 30 | 30 |
| 90 | MINLOW | 6.3 | 1.90% | 76.20% | 21.90% | 30 | 30 |
| 94 | MINLOW | 7.7 | 2.80% | 89.80% | 7.40% | 60 | 60 |
| 251 | NON-MINLOW | 6.0 | 3.50% | 78.40% | 18.10% | 30 | |

## Chapter 4: TITLE VI PROGRAM ATTACHMENTS

### Attachment A: Notice to the Public in English and Spanish – Title VI Signage



**Rights Under Title VI**

Greater Cleveland Regional Transit Authority (GCRTA)

GCRTA operates its programs and services without regards to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with GCRTA's Office of Equal Opportunity.

GCRTA is committed to providing equality of opportunity for employees, customers, and vendors and to complying with all appropriate Federal and State laws, rules and regulations pertaining to the treatment of minorities, women, disabled persons, and veterans in all facets of the Authority's activities. Any person who believes she or he has been discriminated against based on any unlawful discriminatory practices may file a complaint with GCRTA.

**For more information on GCRTA's civil rights program or to file a complaint :**

- Call (216) 356-3085
- Go to RideRTA.com/oeo/ Download the complaint form and mail it to:

  *GCRTA, 1240 West 6th Street Cleveland, Ohio 44113-1302 Attn: Office of Equal Opportunity*
- Come to our administrative office located at

  *1240 West 6th Street, Cleveland, Ohio 44113-1302 and request a complaint form.*
- If information is needed in another language call (216) 356-3085

**Derechos bajo Título VI**

Greater Cleveland Regional Transit Authority (GCRTA)

GCRTA opera sus programas y servicios sin distinción de raza, color y origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles.

Cualquier persona que crea que ha sido perjudicada por alguna práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante la Oficina de Igualdad de Oportunidades de GCRTA.

GCRTA se compromete a brindar igualdad de oportunidades a los empleados, clientes y proveedores y cumplir con todas las leyes, normas y reglamentos federales y estatales correspondientes al tratamiento de minorías, mujeres, personas discapacitadas y veteranos en todas las facetas de las actividades de la Autoridad. Cualquier persona que crea que ha sido discriminada en base a prácticas discriminatorias ilegales puede presentar una queja ante GCRTA.

**Para obtener más información sobre el programa de derechos civiles de GCRTA o para presentar una queja:**

- Llame al (216) 356-3085
- Página de internet a RideRTA.com/oeo y descargue el archivo de queja y envíelo por correo a:

  *GCRTA, 1240 West 6th Street Cleveland, Ohio 44113-1302 A la atención de: Office of Equal Opportunity*
- Venga a nuestra oficina administrativa ubicada en

  *1240 West 6th Street, Cleveland, Ohio 44113-1302 y solicite un formulario de queja.*
- Si se necesita información en otro idioma, llame al (216) 356-3085.

## Attachment B: Determination of Site or Location of Facilities




Study Purpose ..... 2
Title VI Compliance ..... 2
Background and Project Description ..... 3
Site Identification Process ..... 5
Benefits and Burdens Analysis ..... 5
Site Location Maps ..... 6
Alternative Equity Analysis ..... 9
Cumulative Impacts Analysis ..... 9
Community Outreach ..... 10
Conclusions ..... 10
Resources ..... 10

# Title VI Equity Analysis

# 15583 Brookpark Rd

Greater Cleveland Regional Transit Authority

## Study Purpose

The Greater Cleveland Regional Transit Authority (GCRTA) provides public transportation services to the 1.2 million residents of Cuyahoga County, covering 458 square miles in its service area. These services include fixed-route bus, heavy rail, light rail, BRT, and Paratransit. Annual ridership for the overall system is 22.8 million, with the rail system accounting for 3.9 million of those rides.

The purpose of the Title VI Equity Analysis is to determine whether the site selected for the relocated Rail Maintenance Facility will disproportionately impact or burden people on the basis of race, color, or national origin. The site selected for the new Rail Maintenance Facility is a singular parcel located at 15583 Brookpark Rd, that is currently owned by Avalon Precision Casting Co.

## Title VI Compliance

GCRTA is committed to being in full compliance with Title VI. This equity analysis is being prepared to maintain a state of Title VI compliance. Per FTA Circular 4702.1B regarding the determination of site or location of facilities: Title 49 CFR Section 21.9(b)(3), "In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part." Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, "The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin."

Per guidance in the circular, this Title VI Equity Analysis must include: 1. Outreach to persons potentially impacted by the facility siting; 2. Analysis taking place before site selection; 3. Comparison of facilities with similar impacts to determine any cumulative adverse impacts; and 4.Consideration and analysis of site alternatives for disparate impacts.

If disparate impacts are identified, the alternative with the least impacts must be implemented.

## Background and Project Description

GCRTA is investing in a new fleet of rail cars and a variety of capital improvements to modernize its rail system in the coming years. When planning for the arrival of the first rail car in late 2024, the existing Brook Park Rail Shop was identified as the only location that could be reasonably modified to serve the needs of the project. Prior to the project, this facility was used by the Division of Facilities Maintenance (Rail). The planned modifications meant the division could no longer occupy the existing Brookpark facility and must relocate.

A search was conducted to find a site that fit the needs of the Rail Facilities team being relocated. This new facility needed to be located between the Airport and Tower City stations proximate to the Red Line. Consideration was given to developing on GCRTA-owned land and through a property search. Figure 1 shows a map of the existing facilities and locations identified during the property search. Total square footage and permissible zoning were two of the factors considered during the search; this was necessary to allow for flexibility of the various maintenance activities serviced by the shop. The search and cost estimates informed GCRTA to make the purchase of 15583 Brookpark Rd in Brookpark, OH for the new facility.

A Due Diligence Review was conducted for the purchase of this land by subject matter expert staff in Real Estate, Law, and Engineering. Documentation for this review is attached as Appendix A.

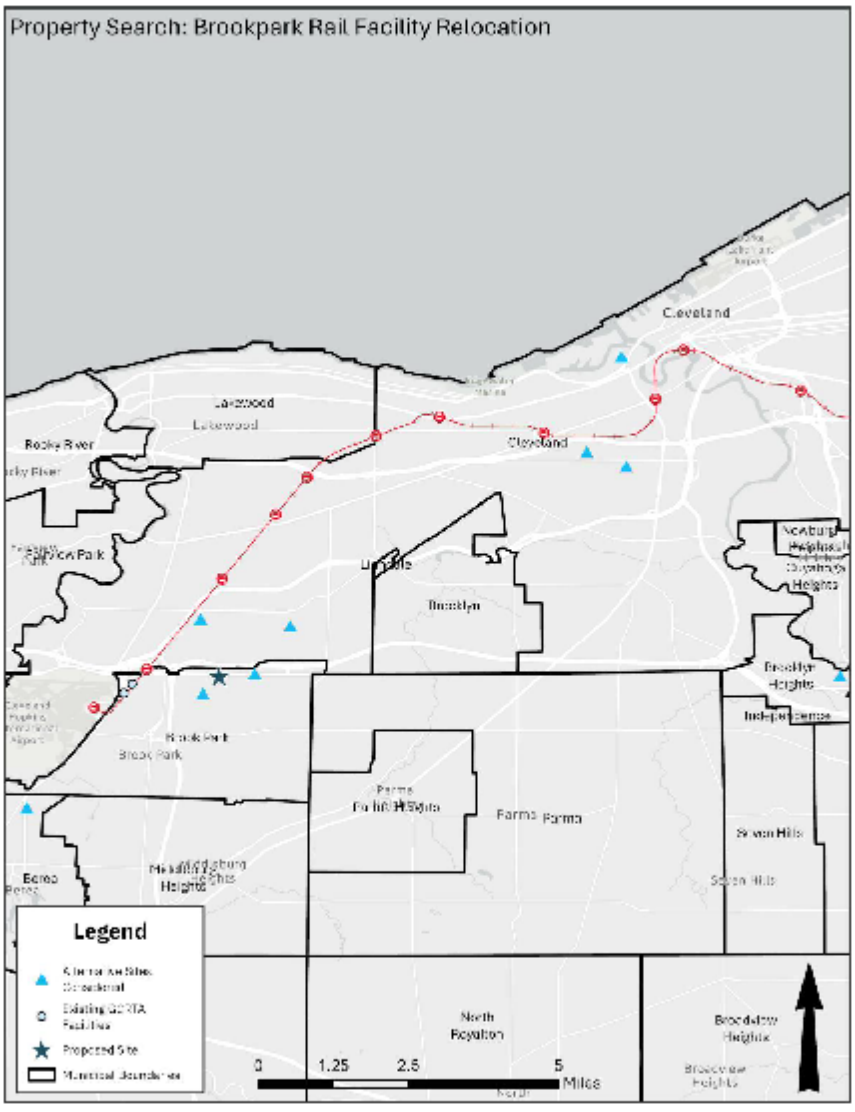



*Figure 1: Property Search, Brookpark Rail Facility Relocation*

## Rail Maintenance Facility

Greater Cleveland Regional Transit Authority

## Site Identification Process

The existing Brook Park Rail Shop is used by the Facilities Maintenance for the upkeep of the west-side rail system. When identifying sites for consideration during the property search, the following criteria was used:

- Between Tower City and Airport along west-side rail
- Indoor and outdoor storage space
- High roll-up doors and loading docks
- Commercial/industrial zoning

## Benefits and Burdens Analysis

The selected site was evaluated to determine the benefits and burdens of the impact of purchasing land for a new Rail Maintenance Facility. The site does require some modifications to the existing structure but will not displace any buildings. Benefits and burdens are summarized below in Table 1.

| Site | Benefits | Burdens |
|---|---|---|
| 15583 Brookpark Rd | ○ Parcel includes large, flexible space that accommodates Transit Police in addition to relocated Rail Facilities group<br>○ Zoning supportive of commercial and light-industrial uses<br>○ Zone "X", lowest possible flood hazard | ○ Land does not belong to GCRTA<br>○ Conditional Use permit may be needed to relocate salt dome to site |

*Table 1: Benefits & Burdens Analysis*

Greater Cleveland Regional Transit Authority

## Site Location Maps

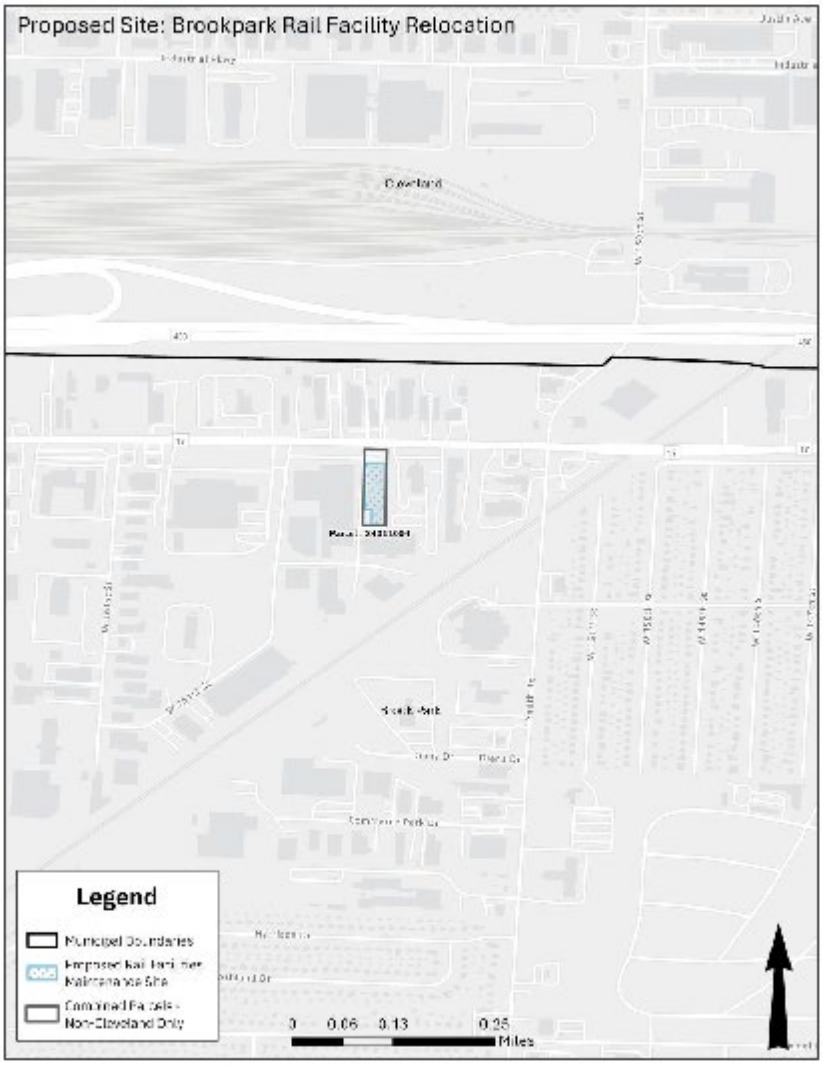



*Figure 2: Proposed Site, Brookpark Rail Facility Relocation*

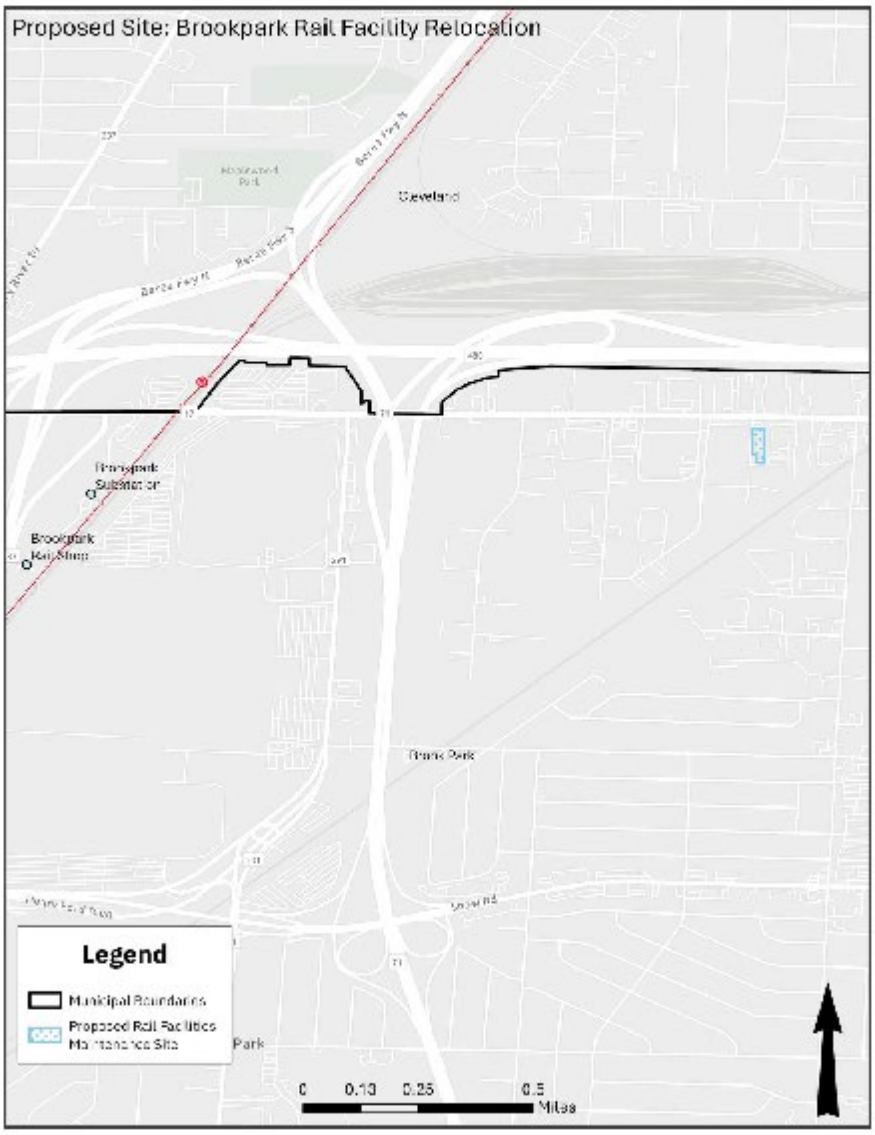



*Figure 3: Proposed Site, Full Extent*

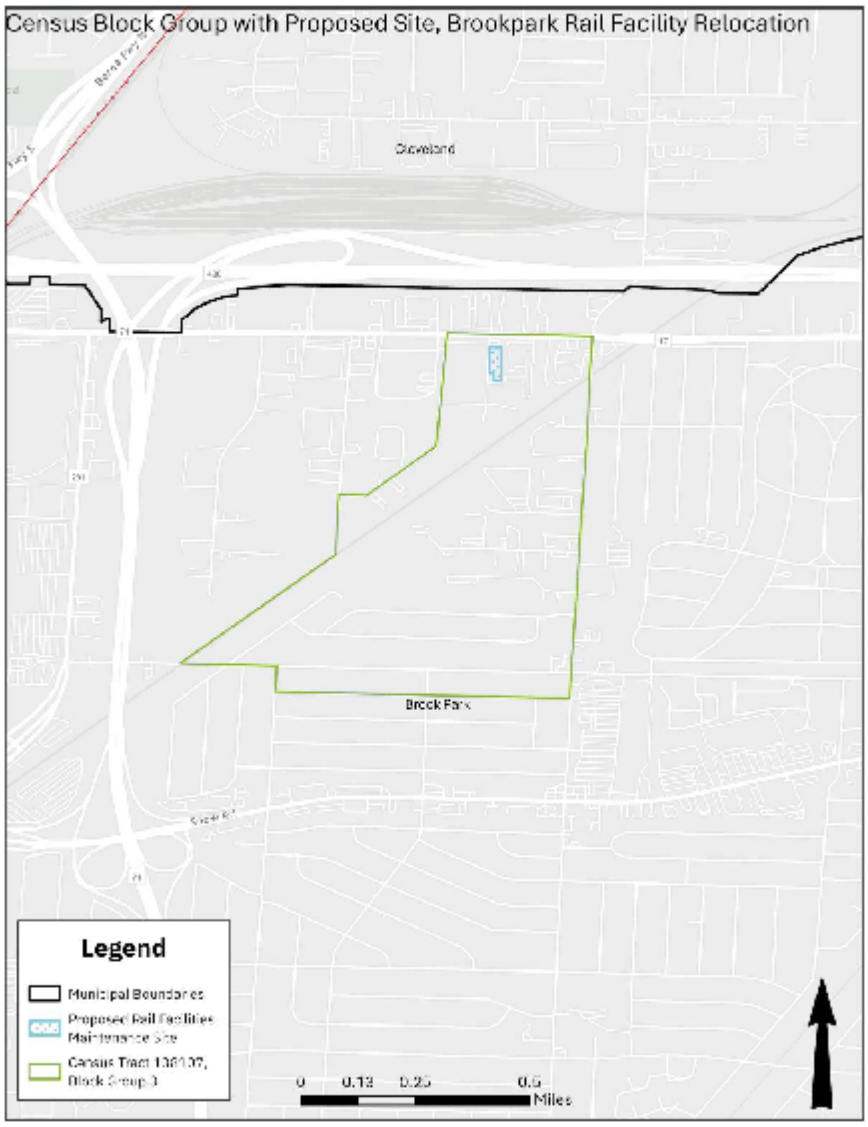



*Figure 4: Census Block Group of Proposed Site for Brookpark Rail Facility Relocation*

## Alternative Equity Analysis

An equity analysis was conducted to compare the location of the proposed site to the city and the county for various demographic factors to assess if the facility will impact minorities, low-income populations, and limited-English proficiency (LEP) populations. Deviations from trends for these metrics will be flagged for potential equity concerns. Table 2 displays this data.

| | Proposed Site Census Tract 1381.07, Block Group 3 | | Brook Park | | Cuyahoga County | |
|---|---|---|---|---|---|---|
| | Number | Percent | Number | Percent | Number | Percent |
| **Total Population** | 1,991 | 100% | 18,509 | 100% | 1,256,620 | 100% |
| **Minority Population** | 345 | 17% | 3,715 | 20% | 532,855 | 42% |
| **Non-Minority Population** | 1,646 | 83% | 14,794 | 80% | 723,765 | 58% |
| **Population Below Poverty Level** | 56 | 2.80% | 1,573 | 8.50% | 207,343 | 16.50% |
| **Median Household Income** | $73,021 | | $64,036 | | $60,074 | |
| **LEP Populations** | 34 | 1.8% | 678 | 4% | 50,813 | 4.3% |
| *Source: United States Census Bureau 2018-2022 ACS 5-Year Estimates* | | | | | | |

*Table 2: Equity Analysis of Demographic Data*

Block Group 3 for Census Tract 1381.07 is located in Brook Park, Ohio within Cuyahoga County. Although the Block Group primarily contains the industrial and commercial Brookpark Road Corridor Special District, there are some single-family residences in the southern portion of the Block Group. Table 2 shows that within the Block Group, there is a higher non-minority population, lower population living below the poverty level, and a much lower percentage of LEP individuals. This analysis shows that individuals protected by Title VI are unlikely to be impacted by a GCRTA facility being located on this site.

## Cumulative Impacts Analysis

The cumulative impacts for the proposed site include land use surrounding the site. The site is Class U7-B, Light Industry/Commercial District Planned Development, which encourages a mix of land uses including transportation facilities and maintenance. The surrounding parcels are part of the Brookpark Road Corridor Special District, which is a land use framework that preserves and protects certain uses to avoid externalities in other

parts of Brook Park. The proposed uses for the facility were confirmed as permitted uses under this special municipal-level land use designation. Adjacent properties compliment land use; facility wouldn't be a disturbance to surrounding neighborhood. Due to these zoning and surrounding land uses adjacent to the site, the addition of the facility to the site will not cause significant cumulative impacts.

### Community Outreach

Community Outreach was not deemed necessary due to the lack of residential population immediate to the proposed site.

## Conclusions

This Equity Analysis and other research have shown that the relocation of the Rail Maintenance Facility to 15538 Brookpark Rd will not have any disparate impacts on protected groups. The purchase of the property will allow for GCRTA to modernize its rail system operations, preserving mobility for residents of Greater Cleveland for the years to come.

## Resources

1121.40 U-7 brookpark road corridor special district and U-7AE adult entertainment sub-district. (n.d.). https://codelibrary.amlegal.com/codes/brookpark/latest/brookpark_oh/0-0-0-41581

2024 Annual Agency Profile - The Greater Cleveland Regional Transit Authority . (2024). https://www.transit.dot.gov/sites/fta.dot.gov/files/transit_agency_profile_doc/2024/70018.pdf

Bureau, U. S. C. (2022). 2022: ACS 5 Year Estimates. https://data.census.gov/table/ACSDP5Y2022.DP05?q=population

Federal Transit Administration. 2012. Circular 4702.1B: Title VI Requirements and Guidelines for Federal Transit Administration Recipients. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/ FTA_Title_VI_FINAL.pdf


RTA
Greater Cleveland
Regional Transit Authority

## Attachment C: The Title VI Board Presentation

The Board Presentation will be added to the package following presentation and approval.

## Attachment D: GCRTA Board Resolution 2026

RESOLUTION NO. 2026-

APPROVING THE 2026 TITLE VI PROGRAM UPDATE FOR SUBMITTAL TO THE FEDERAL TRANSIT ADMINISTRATION (FTA)

WHEREAS, the Board of Trustees has been granted the power and authority, pursuant to Chapter 306 of the Ohio Revised Code, to manage and conduct the affairs of the Greater Cleveland Regional Transit Authority (GCRTA); and

WHEREAS, Title VI of the Civil Rights Act of 1964 requires GCRTA and all recipients of Federal financial assistance to operate their programs and services in a nondiscriminatory manner without regard to race, color, or national origin; and

WHEREAS, the Federal Transit Administration (FTA) issued Circular FTA C4702.1B, effective October 1, 2012, setting forth requirements and guidelines for Title VI compliance; and

WHEREAS, as outlined in the above-referenced Circular, the GCRTA Board of Trustees is required to review and approve a Title VI Program Update for submittal to the FTA every three years; and

WHEREAS, in January of 2026, the draft Title VI Program Update was mailed to all GCRTA Board members; and

WHEREAS, on January 6, 2026, GCRTA's Operational Planning & Infrastructure Committee considered the draft Title VI Program Update and recommended it, with refinements, to the full Board of Trustees.

NOW, THEREFORE, BE IT RESOLVED by the Board of Trustees of the Greater Cleveland Regional Transit Authority, Cuyahoga County, Ohio:

Section 1. The 2026 Title VI Program Update, which is substantially in the form of the attachment hereto, has been reviewed and is approved. The General Manager/CEO & Chief Civil Rights Officer is hereby authorized to submit the update to the Federal Transit Administration.

Section 2. This resolution shall be effective immediately upon its adoption.

Attachment: 2026 Title VI Program Update

Adopted: January 20, 2026

_____
President

Attest:_____
Secretary-Treasurer

## Attachment E: Staff Summary & Comments

Form
100-326
01-12-22

Greater Cleveland Regional Transit Authority
**STAFF SUMMARY AND COMMENTS**

| TITLE/DESCRIPTION: | Resolution No.: 2026- |
|---|---|
| APPROVING THE 2026 TITLE VI PROGRAM UPDATE FOR SUBMISSION TO THE FEDERAL TRANSIT ADMINISTRATION | Date: January 20, 2026 |
| | Initiator: Administration & External Affairs/Office of Equal Opportunity |

ACTION REQUEST:
X Approval Ɣ Review/Comment Ɣ Information Only Ɣ Other _____

1.0 PURPOSE/SCOPE: This action will approve the 2026 Title VI Program Update for submission to the Federal Transit Administration ("FTA"), as required by Title VI of the Civil Rights Act of 1964.

2.0 DESCRIPTION/JUSTIFICATION: Every three years, the GCRTA staff prepares a Title VI Program Update and submits it to the FTA. GCRTA's current Title VI Program expires in March 2026; therefore, the attached 2026 Title VI Program Update is due to FTA by February 1, 2026.

FTA Circular 4702.1B requires each Title VI Program Update to be reviewed and approved by the transit agency's governing body before it is submitted to the FTA. Accordingly, the staff is requesting a resolution from the Board of Trustees indicating that the Board has reviewed and approved the 2026 Title VI Program Update to be submitted to FTA.

3.0 PROCUREMENT BACKGROUND: Does not apply.

4.0 DBE/AFFIRMATIVE ACTION BACKGROUND: Does not apply.

5.0 POLICY IMPACT: Adoption of the resolution will enable GCRTA to comply with Federal guidelines implementing Title VI of the Civil Rights Act of 1964.

6.0 ECONOMIC IMPACT: Failure to adopt the resolution may result in a finding by FTA of non-compliance with FTA Circular 4702.1B and the imposition of sanctions, including a refusal by the FTA to approve grants.

7.0 ALTERNATIVES: Not adopting the resolution would impact and delay the approval of federal grants.

8.0 RECOMMENDATION: On January 6, 2026, the Operational Planning & Infrastructure Committee reviewed and discussed the 2026 Title VI Program Update and referred it to the full Board. It is recommended that the resolution be approved, authorizing the General Manager, Chief Executive Officer, submit the 2026 Title VI Program Update to the FTA.

Recommended and certified as appropriate to the availability of funds, legal form, and conformance with the Procurement requirements.

_____
General Manager, Chief Executive Officer

## Attachment F: Board Meeting Minutes

The Board minutes will be added to this package at the conclusion of the Board Meeting wherein this Title VI filing is approved for submission to the Federal Transit Administration.