

2019-2022

Title VI Program

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Table of Contents

1.) Program Introduction

2.) Agency Information

General Requirements:

3.) Notice to the Public

4.) Complaint Procedures

5.) Public Participation Plan

6.) Language Assistance Plan (LEP)

7.) Non-Elected Committees & Councils

8.) Monitoring of Sub-Recipients

9.) Equity Analysis of Facilities

10.) Board Approval of Title VI Program

Requirements of Transit Providers:

11.) Major Service Change & Impact Policies

12.) Service Standards

13.) Service Policies

APPENDICES

A. Demographic/Service Profile Maps

B. 2017 On-Board Survey and Title VI Route Designations

C. Title VI Complaint Form and Summary

D. 2019-2022 Title VI Program - Public Engagement/Outreach Process

E. Summary of 2016-2019 Outreach Efforts

F. LEP Four Factor Analysis

G. Board Process and Approval of 2019-2022 Title VI Program

H. Summary of 2016-2019 Service/Fare Equity Analyses

1. Program Introduction

Background

Community Transit's Title VI program was revised in 2016 to comply with **Circular FTA.C 4702.1B dated October 1, 2012**. At that time, Community Transit implemented new procedures and policies intended to improve accountability for service provision to minority populations.

This 2019 Title VI Plan is an update of the 2016 revision. It contains the results of refined analyses used to assess the distribution of benefits and impacts throughout the Community Transit service area. It describes how Community Transit promotes the engagement of minority and limited-English populations in service-related decisions. It documents maintained compliance with Title VI provisions and both internal and external reporting related to Title VI. Elements of the program include a Major Service Change Policy, a Disparate Impact Policy, a Disproportionate Burden Policy, a Public Engagement Process, and a Board Approval Process.

Community Transit meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including Community Transit and its third-party contractors by promoting actions that:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- B. Identify and address, as appropriate, disproportionately high and adverse effects of programs and activities on minority populations and low-income populations.
- C. Promote the full and fair participation of all affected Title VI populations in transportation decision making.
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- E. Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

2. Agency Information

Community Transit is a special purpose municipal corporation providing public transportation services. Snohomish County voters created Community Transit in 1976 when they approved a sales tax to support a public transportation benefit area authority, which now encompasses most of urbanized Snohomish County excluding the City of Everett.

Community Transit began operations on October 4, 1976. Community Transit's original service area consisted of the communities of Edmonds, Lynnwood, Marysville, Mountlake Terrace, Brier, Snohomish, and Woodway. Subsequent annexations added Lake Stevens, Monroe, Granite Falls, Mukilteo, Stanwood, Sultan, Arlington, Gold Bar, Index, Darrington, Mill Creek, the Snohomish County portion of Bothell, Silver Firs and the Tulalip Indian Reservation to the service area.

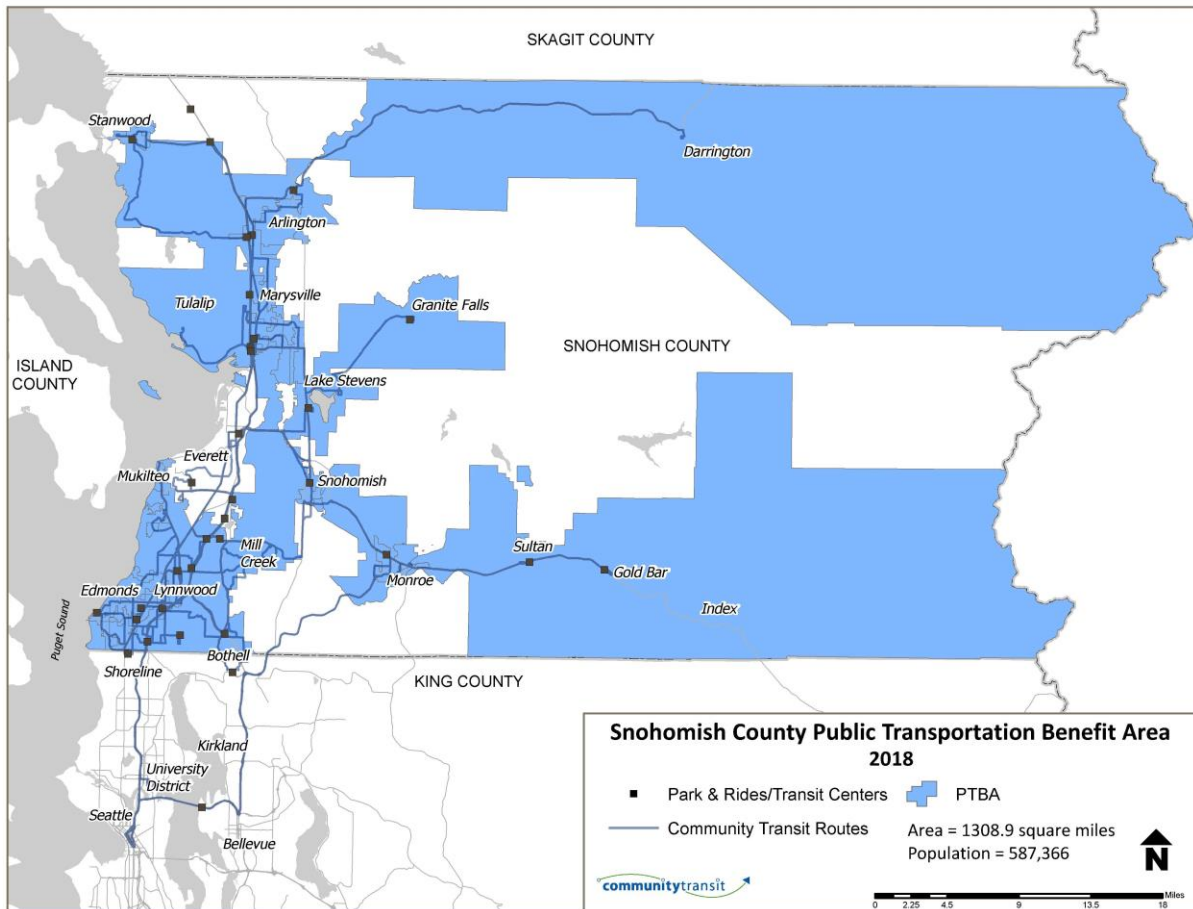


Figure 1 Snohomish County PTBA

Community Transit now serves 587,366 residents, about 73% of Snohomish County's population (805,120 - 2018 data). The remainder of the county's population resides in the City of Everett and in less populated areas of north and east Snohomish County.

Community Transit's governing body is a Board of Directors consisting of ten (10) members as follows:

- Two members of the Snohomish County Council (voting members)
- Two elected officials from cities Community Transit serves with populations of 30,000 or more (voting members)
- Three elected officials from cities Community Transit serves with populations between 10,000 and 30,000 (voting members)
- Two elected officials from cities Community Transit serves with populations of less than 10,000 (voting members)
- One non-voting appointed labor representative.

In 2018 Community Transit had over 10.6 million passenger boardings with an average 37,500 weekday riders. The agency operates 28 local routes, 19 commuter routes and 7 Sound Transit routes (operated under contract).

In 2018 Community Transit operated 634,500 revenue service hours, comprised of 402,000 hours fixed route bus, 145,000 hours vanpool and 87,500 DART para-transit service.

Demographic and Service Profile Maps are shown in **Appendix A**.

Demographic Ridership/Travel Patterns are shown in **Appendix B**.



3. Notice to the Public

Title VI Public Notice

Community Transit posts Title VI notices on our agency’s website, in our schedule and route map book - “Bus Plus,” in public areas of our agency including reception areas, the Ridestore, the Board Room and on our buses, vans and paratransit vehicles.

Notifying the Public of Rights under Title VI

Community Transit operates its programs and services without regard to race, color and national origin in accordance with Title VI of the Civil Rights Act of 1964.

If you believe you have been discriminated against on the basis of race, color or national origin by Community Transit you may file a Title VI complaint by completing, signing and submitting the agency’s Title VI Complaint Form.

How to file a Title VI complaint with Community Transit:

1. Download a PDF of the Title VI Complaint Form from our website <https://www.communitytransit.org/about/nondiscrimination>. Or, have a form mailed to you by contacting Customer Service at (425) 353-RIDE, (800) 562-1375, TTY Relay 711 or riders@commtrans.org
2. Complaints must be filed within 180 days of the alleged discriminatory act. Complaints should contain as much detailed information as possible about the alleged discrimination.
3. The form must be signed and include your contact information.

Please mail all complaints to:

Community Transit
ATTN: Title VI Officer
7100 Hardeson Road
Everett, Washington 98203-5834

4. Complaint Procedures

Filing a Title VI Complaint

Any person who believes they have been discriminated against on the basis of race, color or national origin by Community Transit may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Title VI complaints must be received in writing within 180 days of the alleged discriminatory complaint.

Information on how to file a Title VI complaint is posted on the agency's website <https://www.communitytransit.org/title6>, in our Schedule and Route Map book "Bus Plus," in public areas of our agency including reception desks, the Ridestore, agency Board Room and on our buses and paratransit vehicles or by calling our Customer Service Department. Complainants may download the Title VI Complaint Form from our agency website or request a form be sent to them by Community Transit staff.

Formal Investigation Procedure

Once a Title VI Complaint Form is received by Community Transit, the Title VI Officer will review the complaint and the complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by Community Transit.

Community Transit has sixty (60) days to investigate the complaint. If more information is needed to resolve the complaint the Title VI Officer may contact the complainant. The complainant has ten (10) business days from the date of the letter to send requested information. If the requested information is not received within that time frame the case will be closed.

After the Title VI Officer reviews the complaint, he/she will issue one of two letters to the complainant: a closure letter or letter of finding (LOF). A closure letter summarizes the allegations and states that there was no Title VI violation and that the case will be closed. An LOF summarizes the allegations and provides an explanation of the corrective action taken. If the complainant wishes to appeal the decision, they have 30 days after the date of the letter to do so.

Submitting an Appeal

The appeal should be submitted in writing stating the reason(s) for the appeal. The written appeal should be submitted to Community Transit 7100 Hardeson Road, Everett, WA 98203 ATTN: Title VI Officer. Community Transit's Chief Executive Officer (CEO), or his or her designee, shall promptly consider the appeal. Consideration of the appeal will be based on the written appeal and accompanying documentation and with

the discretion of the CEO or designee may include a meeting with the appealing party. Community Transit's CEO or designee shall within a reasonable time but not to exceed sixty (60) calendar days from receipt of the appeal by Community Transit, issue a written decision to the appealing party. The decision shall include an explanation of the reasons for the decision and any facts that were considered in rendering the decision. The decision by the CEO or designee shall constitute the final administrative determination by Community Transit.

A person may file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey, Avenue SE, Washington, DC 20590

Documenting Title VI Complaints/Investigations

All Title VI Complaint Forms received by Community Transit will be entered into the Customer Comment System. All Title VI complaints are investigated by the Title VI Officer. Any alleged Title VI discrimination complaints are sent directly to the division responsible for investigation and further information of said complaint. The CEO, Executive Directors and Department Managers as well as legal counsel will be consulted if necessary during the investigation period. Title VI complaints will be tracked and logged by the Title VI Officer and submitted to the Executive Department on an annual basis.

A copy of Community Transit's Title VI Complaint Form is shown in **Appendix C-1**.

A summary of Community Transit's monitoring program and complaints received from 2016-2018 is shown in **Appendix C-2**.



5. Public Engagement Plan

The purpose of Community Transit's public engagement plan is to ensure proactive public involvement in the planning process. The plan will allow the opportunity for the public to be involved in all phases of the public comment process by providing complete information, timely public notice, opportunity for making comment and full access to key decisions. All comments are ultimately shared with the Board of Directors for consideration prior to decision making.

It is necessary to establish procedures that allow for, encourage, solicit and monitor participation of all stakeholders in the Community Transit service area, including but not limited to low income and minority individuals and those with limited English proficiency.

Goal:

The goal of the public engagement plan is to have significant and ongoing public involvement, by all identified audiences, in the public participation process for major agency outreach efforts.

Objectives:

To understand the service area demographics and determine what non-English languages and other cultural barriers exist to public participation.

To provide general notification of meetings and forums for public input, in a manner that is understandable to all populations in the area.

To hold public meetings in locations which are accessible to all area stakeholders, including but not limited to, low-income and minority members of the public.

To provide methods for two way communication and information and input from populations which are not likely to attend meetings.

To convey the information in various formats to reach all key stakeholder groups.

Identification of Stakeholders:

Stakeholders are those who are either directly or indirectly affected by an outreach effort, system or service change plan or recommendations of that plan. Stakeholders include:

Board of Directors (BOD) – The governing board of the corporation. The role of the Board is to establish policy and legislative direction for the agency. The BOD is composed of nine elected officials and one appointed non-voting labor

representative serving the respective governing bodies of the component cities and counties within the service area. The BOD defines the organization's mission, establishes goals and approves the budget to accomplish the goals.

Bus Riders – both local riders and commuters (includes students and seniors)

- Downtown Seattle Commuters
- University of Washington (UW) Commuters
- Local Routes (all-day within Snohomish County)
- Boeing Commuters
- DART Riders

Other audiences include:

- Minority Populations
- Limited English Proficiency Riders
- Local Jurisdictions
- Private Businesses or Organizations
- Employers
- Partner Agencies
- Government Stakeholders
- Vanpool Groups

Elements of Community Transit's Public Engagement Plan

The following elements are the means by which Community Transit meets the goal established in the Public Engagement Plan for public involvement in all phases of the public comment process. These strategies provide the public with complete information, timely public notice, opportunity for making comment, and full access to key decisions.

1. Public Notice

- a. Official notification of meetings, hearings or other significant events will be provided in publication via a legal notice prior to the start of the public participation outreach effort. An explanation of the content, along with the date, time and the place of the meetings will be published in a newspaper of general circulation in the Snohomish County area.

The official notice will be published as a display advertisement in the non-legal section of the newspaper.

2. Communication Methods

- a. Community Transit maintains an Internal Agency Communication Plan outlining key communication milestones, timeline, and key agency messages.
- b. *Website*: Community Transit maintains a comprehensive website www.communitytransit.org, which is updated regularly. This site includes route and schedule information, bus stop listings, maps of the system and disability and accessibility information, as well information pertinent to projects, plans and outreach efforts. Our website also includes a non-discrimination page (<https://www.communitytransit.org/about/nondiscrimination>) and a Title VI page (<https://www.communitytransit.org/programs/title6>) to educate the public about our Title VI program.
- c. *Language Translation Services*: This service provides interpreters by telephone to listen to limited English speaking customers, analyze the message and accurately convey the message or question to the customer service representative and/or outreach staff member.
- d. *Social Media*: Our Facebook page, Twitter and Community Transit Blog provide two way communication with customers to deliver messaging and information on a regular basis.
- e. *YouTube*: Videos are a means of communicating visually and telling the story of the agency. Videos are produced for educational purposes and posted on the agency's website.
- f. *Customer Service Center*: (425) 353-RIDE (7433)
- g. Letters to DART paratransit riders
- h. Printed advertisements in English, Spanish and other languages as necessary
- i. Rider Alerts on buses and at bus shelters and A-Board signage at transit centers when warranted
- j. *Electronic Alerts*: Community Transit has more than 40,000 subscribers to its electronic alert system.
- k. *Press Releases*: Press releases are always sent to news media regarding public involvement efforts and our posted on the agency's website.
- l. Group presentations to key stakeholders
- m. Legislative brochures and fact sheets

3. Visualization

- a. Informational presentation boards and map boards.
- b. PowerPoint presentations to key stakeholder groups and jurisdictional audiences.

- c. Maps, charts and graphs outlining key information and affected areas.
- d. Bus advertising both on the interior and exterior of the Community Transit bus fleet.

4. Publications

- a. Guide to System/Service Change brochures outlining system/service changes and affected bus routes.
- b. Brochures or alerts on buses reporting key updates during outreach effort.
- c. Draft copies of any plans or documents available for public review
- d. Program brochures for Transit Instruction Program, Vanpool Program, School Transit Education Program and Commute Trip Reduction Program.
- e. Printed materials may include a language block with direction to call telephone translation services for assistance in languages other than English.

5. Distribution of Information and Materials

- a. On Buses
- b. Bus Shelters
- c. Transit Center and Park & Ride Facilities
- d. Human Services Agencies
- e. Public Libraries and Key Transit Distribution Outlets
- f. Chamber of Commerce Offices
- g. On Community Transit's Website and social media channels
- h. Direct Mail

6. Strategies for Engaging Individuals with Limited English Proficiency

- a. Language Translation Services
- b. Print Advertisements
- c. One-on-One Assistance through Outreach Efforts
- d. Website Information with Google Translate option
- e. Direct Mail

7. Public Engagement Process/Outreach Effort

To ensure a proactive public involvement process, Community Transit will provide a formal public comment period of at least thirty days. The procedures will inform the public about how, when and where they may participate in one of the public forums.

Events such as public meetings and/or open houses are held at schools, churches, libraries and other non-profit locations easily accessible to public

transit and compliant with the Americans with Disabilities Act. Rider forums are held at transit centers, park & ride and on board buses to deliver key information directly to our riders.

- a. Public Meeting Format
- b. Open House Format
- c. Rider Forum Format
- d. On-Board Bus Outreach
- e. Public Hearing
- f. Focus Groups
- g. Surveys
 - Video:* Videos are produced for educational purposes and posted on the agency's website.
- h. *Services for the Disabled:* Upon advance notice, tactile interpreters, interpreters for the hearing impaired, and Braille documents can be provided for public meetings. Notifications of opportunities for public involvement include contact information for people needing these or other special accommodations
- i. *Street Teams:* When warranted
- j. *Community Events:* Farmers Markets, Fairs and Festivals, Employer Worksite Events

8. Public Comment

Formal public comment periods are used to solicit comments on major public involvement efforts around an agency service or system change.

Comments are accepted through various means:

- a. Dedicated email address (publicized in all outreach materials)
- b. Website
- c. Social media channels
- d. Regular mail
- e. Forms using survey tool for compilation
- f. Phone calls to Customer Service Center: (425) 353-RIDE (7433)

9. Response to Public Input

All public comments are provided to the Board of Directors prior to decision making. A summary report is compiled, as well availability of all individual comments either in electronic form or hard copy. Summary reports are also posted on the Community Transit website.

Title VI Outreach Best Practices

Community Transit ensures all outreach strategies, communications and public involvement efforts comply with Title VI. Community Transit's public engagement plan proactively initiates the public involvement process and makes concerted efforts to involve members of all social, economic, and ethnic groups in the public involvement process. Aligned with the above referenced communication tactics, Community Transit provides the following:

- Public Notices published in non-English publications
- Title VI Non-Discrimination pages on agency website
<https://www.communitytransit.org/about/nondiscrimination>
<https://www.communitytransit.org/programs/title6>
- Instructional and informational videos on the agency's website and YouTube channel about Community Transit's Title VI Program
- Google Translate option for translating outreach materials on Community Transit's website
- Printed advertisements and agency communication materials in languages other than English when requested
- Language interpretation and translation services to our customer via phone
- Services for Limited English Proficiency: Upon advance notice, translators can be provided for public meetings

2019-2022 Title VI Program Public Engagement Process

Incorporating Title VI Outreach Best Practices, Community Transit conducted a Public Engagement Process for the 2019-2022 Title VI Program. This process included Community Meetings to provide education and highlight key components of the Title VI Plan. Community Transit's approved **Major Service Change Policy, Disparate Impact** and **Disproportionate Burden Policies and Service Standards** were called out as key components of the Title VI Program. Materials were created to explain these policies as well as provide education on how they relate to minority populations. Outreach materials such as the rack card developed for buses and transit facilities asked specifically for comment on how Community Transit measures impacts to minority populations when making service or fare changes.

Community Transit staff provided briefings to the Board of Directors through Board Committees and the Executive Staff of Community Transit. These briefings included highlighting significant changes in the proposed 2019-2022 Title VI Program update. A draft 2019-2022 Title VI Program was provided to the Strategic Alignment and Capital

Development Committee. All committee materials were provided to the full Board of Directors and the Board was provided information at their board meetings.

Community Transit conducted a public comment period from April 5, 2019 to May 10, 2019 to provide opportunities for feedback on the 2019-2022 Title VI Program update.

Comments were accepted during the public outreach period via:

- a. E-mail comments to title6@commtrans.org
- b. Mail comments to Community Transit at 7100 Hardeson Rd, Everett, WA 98203
- c. Share comments by phone at (425) 353-7433
- d. Post comments on Community Transit's Facebook page or Twitter page @MyCommTrans
- e. Share comments in person by attending a public meeting

A full summary of the 2019-2022 Title VI Program Public Outreach/Engagement Activities is shown in **Appendix D**

A summary of 2016-2019 Public Outreach Efforts is shown in **Appendix E**.



6. Language Assistance Plan

Who Needs Assistance

Community Transit completed an updated Four Factor Analysis as defined in Chapter III-7 of FTA Circular 4702.1B, considering:

- 1) The number or proportion of limited English persons (LEP) eligible to be served or likely to be encountered by Community Transit
- 2) The frequency with which LEP persons come into contact with Community Transit
- 3) The nature and importance of Community Transit service to people's lives
- 4) The resources available for LEP outreach, and the costs associated with that outreach

Based on this Four Factor Analysis, the most significant population of limited English persons in Community Transit's service area is Spanish-speaking.

Spanish-speakers:

- 9% of Community Transit customers
- Access Language Translation Services an average of four times a month
- Are regularly encountered by Outreach staff

Secondary languages, in order of significance, are:

- Korean
- Chinese
- Russian

Language Assistance Measures

Language Translation Services

Community Transit uses language translation services for limited-English speaking persons. Community Transit promotes the availability of this free telephone-based service through a translated block of text in Spanish and, when possible, Korean, Chinese, and Russian. Language translation service information is currently posted in the following:

- Bus Plus schedule books
- Bus interior cards

- Community Transit Website (Google Translate)
- Title VI Notification to the Public
- Service Change materials
- Transportation Options booklet (inside cover)
- Bus stop schedule posters (as space permits)

Community Transit's language translation service is used primarily by Customer Information staff, but is also used as needed by employer outreach staff, public outreach staff, Ridestore staff and transportation supervisors.

Website

The Community Transit website is the best source for updated information on the system.

The website uses a combination of Google Translate and our telephone-based language translation services to provide current information in many languages. The Google Translate tool can be accessed from every page on the Community transit website. When selected, all text on that page is translated into one of more than 100 languages according to the viewer's choice.

Accompanying this tool are instructions on how to access our free telephone language translation services through our Customer Information phone line. If a website viewer has questions after translating the page text, they can call our Customer Information phone number and reach a live interpreter to translate their conversation with Community Transit Customer Relations Staff.

Translated Materials

Community Transit contracts with professional translation services to translate select paragraphs or entire pieces for print and web publications. The services also assist with layout by providing the script needed for Korean, Chinese and Russian translations.

On a regular basis, bilingual staff reviews these professional translations to ensure that transit terms and concepts are translated appropriately.

Community Transit will often re-use translated text blocks on multiple pieces, reducing the need for new translations and expense. We also promote the use of our Language Translation Services and Google Translate.

Service Changes

Major bus service changes to the roads and communities we serve, as well as fare changes, are assumed to impact LEP people.

To ensure people are aware of significant possible impacts, Community Transit includes limited translation (notifying that service changes are being considered or implemented) in three to four languages (Spanish, Korean, Russian and/or Chinese) as part of service change materials.

The Highway 99 corridor served by *Swift* Bus Rapid Transit has a high percentage of LEP and low-income people and is often targeted for in-person outreach onboard or at stations. Outreach staff are trained to use our Language Translation Services as a resource and often carry translated materials.

Swift Bus Rapid Transit

Swift is a pay-before-you-board service. Riders who pay cash or use credit cards buy their tickets in advance at ticket vending machines located at each station. The machines have instruction screens in English and Spanish. Informational posters at the stations include Spanish, Korean, Chinese, and Russian text promoting the language line.

When *Swift* Blue Line bus rapid transit service began in 2009, Community Transit printed “Rider Information” cards in English, Spanish, Korean, Chinese and Russian. Public information pieces for *Swift* Green Line, open in March, 2019, included text promoting the language line in Spanish, Korean, Chinese, and Russian.

DART Paratransit

Community Transit’s paratransit services are operated by Homage Senior Services. They ensure access to limited-English speaking persons in the following ways:

- Aging, Disability and Multicultural Resource Specialists are available to assist with communications should someone inquire about paratransit eligibility or transportation needs. Agency staff include speakers of Spanish, Russian/Ukrainian, Korean, Tagalog, Chinese and Vietnamese.
- Homage staff can also use Community Transit language translation services to assist customers by phone.

Travel Training

Community Transit’s Contracted Services Division provides training, outreach and materials to a variety of groups or individuals. Community Transit’s Transit Instruction

Program offers personalized one-on-one personal travel training. The program works with Washington Vocational Services to provide training to limited/non-English speaking populations. If an interpreter is required, the venue is asked to provide that resource.

The Community Transit Mobility Specialist provides group presentations about our fixed-route system and arranges group bus rides. Presentations are provided at:

- Senior centers and senior living complexes
- Ethnic meal sites
- Churches
- Transition classes (for disabled students ages 18-21 preparing to be independent)
- Community Colleges serving international students
- Other agencies looking for “How To Use Transit”

Brochures promoting the Transit Instruction Program are printed in English and Spanish, as well as other languages, such as Korean, Russian, Tagalog, Chinese and Vietnamese, upon request.

Community Outreach

Every quarter Community Transit staff present information on the fixed-route bus system and EdPass bus pass program to international students at Edmonds Community College. The school provides interpreters for these presentations.

Staff attends several community fairs throughout the year, including senior ethnic health and transition fairs. Staff also attends community festivals and are visible at events such as National Night Out, Bike to Work Day and others.

Community Transit staff work with many agencies that directly support minority populations and limited English speaking individuals (such as DSHS, DVR and Work Opportunities and Ethnic Support Groups).

Community Transit also partners with North Sound 2-1-1 Resource Line, which provides referrals to transportation programs and other services. The 2-1-1 phone tree offers Spanish language and language translators as options for callers.

Specific Notice to LEP Persons

- *Language Line*: promoted on buses, in schedule books, on bus stop posters, on website, and in targeted materials such as service change outreach
- *Website*: Google Translate is available to translate website text into more than 100 languages. Instructions on how to access our free telephone Language Line are also available.

- *Publications:* When a translation is included in an English-language piece, Community Transit strives to ensure it will also be noticed by non-English speakers. Often, Community Transit's language line is promoted on the inside front cover or on the back cover.

Monitoring the Plan

To ensure that Community Transit is serving all the residents of Snohomish County we annually:

- Review language line calls to assess what languages are in highest demand.
- Review Census data when updates occur.
- Assess outreach effectiveness and methods, including a review of the first two items to determine if communications are targeting the right language groups.

The Four Factor Analysis done to create our Language Assistance Plan is shown in **Appendix F**.



7. Non-Elected Committees & Councils

Community Transit does not have any non-elected committees or councils.

The elected Board of Directors serves as the governing body of the Corporation: they establish policy and legislative direction for the agency. The Board defines the organization's mission, establishes goals, and approves the budget to accomplish the goals. Board members represent the agency's position to the public, in the Legislature, and in the community, working closely with the Chief Executive Officer (CEO). The Board is composed of nine elected officials selected by and serving at the pleasure of the respective governing bodies of the component cities and county within the service area and one appointed non-voting labor representative. Board members are appointed for two-year terms.

8. Monitoring of Sub-Recipients

Community Transit does not have any sub-recipients.

9. Equity Analysis of Facilities

Community Transit has not constructed any storage facilities, maintenance facilities or operations centers in the last three years. For purposes of the Title VI requirement of "Facilities," bus shelters and transit amenities are not covered. Construction of bus shelters and transit amenities receive equity analysis under the environmental determination processes.

10. Board Approval of Title VI Program

Community Transit's Board of Directors is comprised of nine elected officials representing cities and the county within the service area. Community Transit's Board of Directors receives briefings through monthly committee meetings and at Board of Directors Meetings. The Board was provided with a draft Title VI Program document and the schedule of public involvement dates. The Board of Directors conducted a Public Hearing for Community Transit's Title VI Program and was responsible for approval of the 2019-2022 Title VI program.

The Board Process and Approval of the 2019-2022 Title VI Program is shown in **Appendix G.**

11. Major Service Change & Impact Policies

The Board of Directors passed Resolution No. 04-12 on August 12, 2012. This resolution established a formal hearing procedure for the adoption of major changes in transit routes.

A major change in route includes the addition or elimination of a route within Community Transit's system, increasing or decreasing the number of service hours operated on a route by 25% or more or routing changes that alter 25% or more of a route's path. Minor changes to an existing route shall not constitute a "major change in route."

A service change that is deemed a "Major Service Change" based on the description above would require a Title VI analysis.

Service changes that are deemed as a "Major Service Change" will also be required to have disparate impact and disproportionate burden analysis done.

The 2019-2022 Title VI Program includes the agency's current Disparate Impact and Disproportionate Burden policy:

Community Transit's Disparate Impact & Disproportionate Burden Policy:

Adverse Effects

Major Service change proposals and all fare change proposals shall be analyzed to measure and compare the level of adverse effect (loss) or benefit (gain) between minority and non-minority populations and between low-income and non-low-income populations as determined via demographic analysis of proposed changes and U.S. Census data and/or transit rider survey data.

What is Fair?

Determination of adverse impact is based on the federal standard described in Uniform Guidelines published by the Equal Employment Opportunity Commission (EEOC) known as the "four-fifths rule." This standard requires benefits to accrue to protected populations at a rate at least four fifths (4/5) (or eighty percent) of the rate for unprotected populations. Likewise, adverse effects must be borne by unprotected populations at a rate at least four fifths (4/5) (or eighty percent) of the rate for protected populations.

Stated another way, the maximum acceptable difference (positive or negative) in level of benefit between protected and unprotected populations is 20%. For changes in transit service level or transit fare rates, this standard applies as follows for minority and low-income populations:

Disparate Impact on Minority Populations

If the impact of a major service change proposal or any fare change proposal requires a minority population to receive benefits twenty percent (20%) less or to bear adverse effects twenty percent (20%) more than those benefits or adverse effects received or borne by the non-minority population, that impact will be considered a disparate impact.

Disproportionate Burden on Low Income Populations

If the impact of a major service change proposal or any fare change proposal requires a low-income population to receive benefits twenty percent (20%) less or to bear adverse effects twenty percent (20%) more than those benefits or adverse effects received or borne by the non-minority population, that impact will be considered a disproportionate burden.

The Title VI Analyses for service & fare changes conducted by Community Transit during 2016-2019 are **included in Appendix H.**

12. Service Standards

Community Transit's system-wide service standards and policies are documented in the agency's adopted Long Range Transit Plan 2030 as a component of *Appendix II, Service Guidelines*. The Long Range Transit Plan 2030 underwent a public review process with public meetings, focus groups and a public hearing between 2009 and 2011. The plan was adopted by resolution of the Board of Directors of Community Transit on March 3, 2011.

The subset of Community Transit's fixed route service standards and policies called out in FTA Circular 4702.1B are described below.

1 Required Quantitative Standards for Fixed Route Modes:

Vehicle Load

Mode	Guideline
Bus Rapid Transit (BRT):	Standees up to 1.5 load factor are expected. Should not exceed 2.0 on any trip
Corridor Based Routes:	Load factor should not exceed 1.25 on any trip
Local Routes:	Load factor should not exceed 1.15 on any trip
Suburban/Rural Routes:	Load factor should not exceed 1.00 on any trip
Commuter Routes:	Load factor should not exceed 1.00 on any trip

Vehicle Headway

Mode	Guideline
Bus Rapid Transit (BRT):	5 - 10 min peak, 10 - 20 min off-peak
Corridor Based Routes:	10 - 15 min peak, 15 - 30 min off-peak
Local Routes:	20 - 30 min peak, 30 - 60 min off-peak
Suburban/Rural Routes:	60 minutes or longer
Commuter Routes:	30 minutes or shorter, or to match shift/class times



On-Time Performance

Mode	Guideline
Bus Rapid Transit (BRT):	Headway Management – Exceed published headway by no more than 20% at least 95% of the time
Corridor Based Routes:	Meets schedule 90%+
Local Routes:	Meets schedule 90%+
Suburban/Rural Routes:	Meets schedule 90%+
Commuter Routes:	95% Scheduled departure time

Service Availability

Mode	Guideline
Bus Rapid Transit (BRT):	<ul style="list-style-type: none"> • Purpose: Ultimate Corridor Buildout • Availability: On arterial/highway within Urban Growth Area • Stop Spacing: 0.75+ mile, stop at all stations • Design Principle: Bi-directional service, straight, on-corridor with few direction changes • Land Use/Market Density: Mixed use with balance of housing and jobs. Transit integrated into design. Major trip producers located within ¼ mile of Transit Emphasis Corridor. Required: established transit-supportive land use and/or policy framework that encourages development of transit-supportive land use. 15 dwelling units per acre or 15,079 persons/jobs within 1/2 mile of station (30+ persons or jobs per acre)
Corridor Based Routes:	<ul style="list-style-type: none"> • Purpose: Ultimate Corridor Buildout or Progression to BRT • Availability: On arterial/highway within Urban Growth Area • Stop Spacing: 0.10 - 0.75 mile stop spacing, stop on demand • Design Principle: Bi-directional service, straight, on-corridor with few direction changes • Land Use/Market Density: Mixed use with balance of housing and jobs. Transit integrated into design. Major trip producers located within ¼ mile of Transit Emphasis Corridor. Desirable: established transit-supportive land use and/or

Mode	Guideline
	policy framework that encourages development of transit-supportive land use. 15 dwelling units per acre or 15,079 persons/jobs within 1/2 mile of stop (30+ persons or jobs per acre)
Local Routes:	<ul style="list-style-type: none"> • Purpose: Feeding BRT and Corridor Routes • Availability: On arterial/collector streets in rural areas and within Urban Growth Area • Stop Spacing: 0.10 - 0.5 mile stop spacing, stop on demand • Design Principle: Bi-directional service, direction changes warranted by demand • Land Use/Market Density: Residential and lower-density employment areas. 7 dwelling units per acre or 7,540 persons/jobs within 1/2 mile of stop (15+ persons or jobs per acre)
Suburban/Rural Routes:	<ul style="list-style-type: none"> • Purpose: Basic Connectivity in Lower-Demand Markets, Lifeline Service • Availability: On arterial/collector streets in rural areas and within Urban Growth Area • Stop Spacing: 0.10 – 1.0 mile stop spacing, stop on demand • Design Principle: Bi-directional service or peak-direction service, direction changes warranted by demand • Land Use/Market Density: N/A
Commuter Routes:	<ul style="list-style-type: none"> • Purpose: Geographically Focused Commuter Market • Availability: On freeway/highway in rural areas and within Urban Growth Area • Stop Spacing: Park & Ride/Transit Center based, stop on demand and at park & rides/transit centers • Design Principle: Straight, on-corridor with few direction changes. Peak-direction service • Land Use/Market Density: Destination is Regional Center or Manufacturing and Industrial Center (MIC). 2,800 jobs within 1/4 mile of destination (15 jobs per acre); or a park & ride or major transfer location



13. Service Policies

Distribution of Transit Amenities

Mode	Guideline
Bus Rapid Transit (BRT):	Landmark Station with: branding, unique shelters, real-time info, fare payment equipment, posted maps
Corridor Based Routes:	Standard shelter, some with real-time information, posted maps and schedules
Local Routes:	Some standard shelters, posted schedules
Suburban/Rural Routes:	Some standard shelters, posted schedules
Commuter Routes:	Standard shelter, some with real-time information, posted schedules

Vehicle Assignment

Mode	Guideline
Bus Rapid Transit (BRT):	Specialized BRT, high capacity, low floor. Distinct branding: <i>Swift</i>
Corridor Based Routes:	Low floor, standard agency branding
Local Routes:	Low floor, standard agency branding
Suburban/Rural Routes:	Low floor, standard agency branding
Commuter Routes:	Low floor high capacity, articulated or double-deck low floor, standard agency branding



Vehicle Assignment of Each Mode

Buses:

Buses are assigned based on operational requirements of the route such as height/size, route capacity and turning radius. Dispatch completes a daily yard inventory of buses and assigns buses based on how they are parked; the first bus in line is assigned to the first run of work. Drivers are given a bus number when they check into duty with Dispatch.

Paratransit:

Our Paratransit (DART) vehicles are assigned the night before based on availability and whether the trip is a group trip or a single rider trip.

Vans:

Vanpool vehicles are assigned to groups based on the size of their group. A group that is next on the wait list for a 7 passenger van will get the next 7 passenger van that is available. This is the same for all sizes of vans.

