

# **Spokane Transit Authority**

## **2020 Title VI of the Civil Rights Act Program**

**Final**

Adopted by the STA Board of Directors on March 19, 2020



Upon request, alternative formats of this document will be produced for people with disabilities. Please call (509) 325-6094 or TTY WA RELAY 711 or email [ombudsman@spokanetransit.com](mailto:ombudsman@spokanetransit.com).

## Contents

SECTION 1 INTRODUCTION.....	5
Program Overview .....	6
SECTION 2 TITLE VI NOTICE, COMPLAINT POLICY AND PROCEDURES.....	7
Title VI Notice to the Public .....	8
Title VI Complaint Procedures .....	8
Title VI Complaint Form .....	11
SECTION 3 RECORD OF TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS.....	13
List of Title VI Investigations, Complaints, and Lawsuits .....	14
SECTION 4 COLLECTION OF DEMOGRAPHIC DATA.....	15
Overview .....	16
Demographic Analysis.....	16
Passenger Survey .....	24
SECTION 5 PUBLIC PARTICIPATION PLAN.....	26
Overview .....	27
Communications and Public Input .....	27
Public Outreach Techniques for Title VI Populations .....	34
Summary of Public Outreach and Involvement.....	34
SECTION 6 LIMITED ENGLISH PROFICIENCY ANALYSIS AND LANGUAGE ASSISTANCE PLAN.....	37
Introduction .....	38
The Four-Factor Analysis.....	39
Determination of LEP Assistance Needed.....	47
Plan for Assisting Persons of Limited English Proficiency.....	48
SECTION 7 ENSURING SUBRECIPIENT COMPLIANCE.....	52
Program Overview .....	53
Steps to Ensure Title VI Compliance of Subrecipient.....	53
SECTION 8 SYSTEMWIDE SERVICE POLICIES AND STANDARDS.....	55
Overview .....	56
System-Wide Service Policies .....	56
System-Wide Service Standards .....	58
System- Wide Title VI Policies.....	59

SECTION 9 EVALUATION OF 2017-2019 SERVICE AND FARE CHANGES.....	61
Summary of Major Service and Fare Changes Implemented since previous Title VI Update .....	62
Service Changes .....	62
Facility Site Equity Analysis .....	82
SECTION 10 MONITORING TRANSIT SERVICE.....	83
Part 1 Overview.....	84
Part 2 Sampling & Methodology.....	84
Part 3 Data Collection .....	85
Part 4 Conclusions.....	90
SECTION 11 STA BOARDS AND COMMITTEES .....	92
Overview .....	93
STA Board of Directors and Committees .....	93
ATTACHMENT A 2018 Passenger Survey .....	95
ATTACHMENT B LEP Service Providers Survey.....	120
ATTACHMENT C Certifications and Assurances.....	158
ATTACHMENT D Board of Directors Resolution.....	164
Table 1 List of Title VI Investigations, Complaints, and Lawsuits.....	14
Table 2 Minority and Low-income Population Summary .....	17
Table 3 Census Tracts Exceeding 15.4% Minority Population .....	18
Table 4 Census Tracts Exceeding 15.6% Low-Income.....	20
Table 5 Public Outreach Tools .....	28
Table 6 Public Input Policies .....	31
Table 7 Public Process for Grants .....	32
Table 8 List of Organizations Involved in Mobility Mentor Program.....	35
Table 9 PTBA LEP Population by Census Tract.....	40
Table 10 Language Spoken at Home.....	44
Table 11 Means of Transportation to Work and Ability to Speak English .....	45
Table 12 List of STA Subrecipients .....	54
Table 13 System-Wide Service Policies.....	56
Table 14 System-Wide Service Standards.....	58
Table 15 Title VI Policies .....	59
Table 16 Fare Rate as of July 2018.....	62
Table 17 2017 Service Changes.....	63
Table 18 2018 Service Changes.....	68
Table 19 – 2019 Service Changes.....	77

Table 20 Minority Census Tracts Along Selected Routes.....	85
Table 21 Vehicle loads for minority and non-minority routes.....	86
Table 22 Vehicle headways for minority and non-minority routes .....	86
Table 23 On-time performance for minority and non-minority routes.....	87
Table 24 PTBA urban population within ½ mile of a bus stop .....	87
Table 25 Vehicle Assignments.....	88
Table 26 Shelters.....	90
Table 27 Non-Elected Committees Minority Composition .....	94
Map 1 STA PTBA with Census Tracts.....	18
Map 2 Census Tracts Exceeding 15.4% Minority Population.....	20
Map 3 Census Tracts Exceeding 15.6% Low-Income .....	23
Map 4 PTBA LEP Population by Census Tract .....	43
Figure 1 Point to your language poster.....	49
Figure 2 Bus Stop Sign.....	89

Spokane Transit assures nondiscrimination in accordance with Title VI of the Civil Rights Act of 1964 and the American Disabilities Act. For more information, visit [www.spokanetransit.com](http://www.spokanetransit.com). All phone numbers are accessible for people who are deaf or hard of hearing through Relay 711.

Upon request, alternative formats of this document will be produced for people who are disabled. Call (509) 325-6094 or email [ombudsman@spokanetransit.com](mailto:ombudsman@spokanetransit.com).

## **SECTION 1 INTRODUCTION**

## **Program Overview**

According to Section 601 of Title VI of the Civil Rights Act of 1964:

*No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.*

The Civil Rights Restoration Act of 1987 clarified the broad, institution-wide application of Title VI. Title VI covers all the operations of covered entities without regard to whether specific portions of the covered program or activity are federally funded. The term “program or activity” means all operations of a department, agency, special purpose district, government, or the entity of such State or local government that distributes such assistance and each department or agency to which assistance is extended, in the case of assistance to a State or local government. (FTA C 4702.1B, Chap. II-I) The Federal Transit Administration (FTA), from which Spokane Transit Authority (STA) receives Federal funds, is required to fulfill the US Department of Transportation’s (USDOT) Title VI regulations (49 CFR part 21).

To ensure compliance with the requirements of Title VI, STA is required to adopt a Title VI Program. The contents of this document follow the requirements and guidelines of FTA’s Title VI Circular (FTA C 4702.1B), which is also meant to fulfill USDOT regulations.

**SECTION 2 TITLE VI NOTICE, COMPLAINT POLICY AND PROCEDURES**

## **Title VI Notice to the Public**

STA posts the agency's Title VI Notice on the STA website, on transit vehicles, and in public areas including the Spokane Transit Plaza, and the reception area of the STA Administration Center. The Title VI Notice describes one's rights under Title VI. It contains information on how to seek information in another language and is translated into the three most prevalent LEP languages. The contents of the notice are as follows, and on the notice are also written in the safe harbor languages:

### ***Non-Discrimination Notice***

*In accordance with Title VI of the Civil Rights Act of 1964, Spokane Transit does not discriminate on the basis of race, color, or national origin. For more information on your rights or the procedures to file a discrimination complaint, or to request this information in an accessible format, please contact the STA Ombudsman at (509) 325-6094 (TTY Relay 711), or STA's Administrative Office, 1230 West Boone Avenue, Spokane, WA 99201.*

*If information is needed in another language, contact (509) 325-6094.*

*Si necesita información en otro idioma, comuníquese al (509) 325-6094.*

*Для получения информации на другом языке звоните по тел. (509) 325-6094.*

*Nếu quý vị cần thông tin bằng một ngôn ngữ khác, xin vui lòng gọi số (509) 325-6094.*

## **Title VI Complaint Procedures**

The following is STA's published complaint procedure in English, Spanish, Russian, and Vietnamese:

### **Title VI Discrimination Complaint Procedure**

Title VI of the 1964 Civil Rights Act requires that "No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

Spokane Transit does not discriminate in the provision of service on the basis of race, color, and national origin.

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Spokane Transit Authority (STA) may file a Title VI complaint by completing and submitting Spokane Transit's Title VI Complaint Form. The form must be complete for STA to investigate. Spokane Transit Authority does not investigate complaints received more than 180 days after the alleged incident.

For more information on STA's nondiscrimination obligations, or to get a copy of Title VI Complaint Procedures and a Form to file a discrimination complaint, contact:

STA Ombudsman  
1230 West Boone Avenue  
Spokane, WA 99201  
(509) 325-6094  
TTY Relay 711

### **Procedimiento de Quejas por Discriminación del Título VI**

El Título VI de la Ley de derechos civiles de 1964 establece que "Ninguna persona en los Estados Unidos, por motivos de raza, color o nacionalidad, será excluida de participar, será negada de los beneficios o



será objeto de discriminación bajo ningún programa o actividad que reciba asistencia financiera federal". Spokane Transit Authority (STA) no discrimina en la prestación de servicios en base a la raza, color y nacionalidad.

Cualquier persona que crea que ha sido discriminada por razones de raza, color o nacionalidad por parte de Spokane Transit, puede presentar una queja del Título VI, completando y enviando el Formulario de Quejas del Título VI de STA. El formulario debe ser completado para que STA investigue. Spokane Transit Authority no investiga las quejas recibidas después de 180 días del supuesto incidente.

Póngase en contacto con el Mediador de STA quien concertará una reunión con un traductor de idiomas para ayudarlo a completar el Formulario de Queja del Título VI.

Mediador de STA  
1230 West Avenue Boone  
Spokane, WA 99201  
(509) 325-6094  
711 para retransmisión de telecomunicaciones a través de un teléfono de texto (TTY)

#### **Раздел VI Процедура подачи жалобы о дискриминации**

Раздел VI Закона о гражданских правах 1964 года предусматривает, что: "Никто в Соединенных Штатах не может быть исключен из участия, поражен в правах либо подвергнут дискриминации в рамках программы либо мероприятия, финансируемого из федерального бюджета". При оказании услуг Транспортное управление г. Спокэн (STA) не допускает дискриминации по признаку расы, цвета кожи и национального происхождения.

Любой человек, который полагает, что в отношении него Транспортным управлением была допущена дискриминация по признаку расы, цвета кожи или национального происхождения, может подать жалобу, предусмотренную Разделом VI, заполнив и подав в Транспортное управление жалобу по Форме, предусмотренной Разделом VI. Поданная по форме жалоба является основанием для проведения Транспортным управлением г. Спокэн соответствующего расследования. Транспортное управление г. Спокэн не расследует жалобы, поданные по истечении 180 дней с момента предполагаемого инцидента.

Для получения содействия переводчика при заполнении Формы жалобы, предусмотренной Разделом VI, свяжитесь с Омбудсменом Транспортного управления.

STA Ombudsman  
1230 West Boone Avenue  
Spokane, WA 99201  
(509) 325-6094  
Телетайп: 711

#### **Thủ tục khiếu nại Phân biệt đối xử Tiêu đề VI**

Tiêu đề VI của Đạo luật Dân quyền năm 1964 đòi hỏi rằng "Không ai trên lãnh thổ Hoa Kỳ, dựa trên cơ sở chủng tộc, màu da, nguồn gốc quốc gia, bị loại trừ khỏi việc tham gia vào, bị từ chối quyền lợi, hoặc bị phân biệt đối xử trong bất kỳ chương trình hoặc hoạt động nhận hỗ trợ tài chính nào của liên bang. "

Spokane Transit Authority (STA) không phân biệt đối xử trong việc cung cấp các dịch vụ dựa trên cơ sở chủng tộc, màu da và nguồn gốc quốc gia.

Bất kỳ ai tin rằng mình đã bị Spokane Transit phân biệt đối xử dựa trên cơ sở chủng tộc, màu da, hoặc nguồn gốc quốc gia có thể nộp đơn khiếu nại Tiêu đề VI bằng cách điền và nộp Mẫu đơn khiếu nại Tiêu đề VI của STA. Mẫu đơn phải được hoàn thiện đầy đủ để phục vụ cho việc điều tra của STA. Spokane Transit Authority không điều tra những khiếu nại được quá 180 ngày kể từ khi diễn ra sự việc bị cáo buộc.

Vui lòng liên hệ Thanh tra viên của STA, người sẽ sắp xếp cho bạn một cuộc gặp với phiên dịch viên để hỗ trợ bạn trong việc hoàn tất Mẫu đơn khiếu nại Tiêu đề VI.

Thanh tra viên của STA  
1230 Đại lộ West Boone  
Spokane, WA 99201  
(509) 325-6094  
Số chuyển tiếp TTY 711

## Title VI Complaint Form

Below is STA's official Title VI Complaint Form in English. Complaint forms in the three safe harbor languages (Spanish, Russian and Vietnamese) are available upon request:

### Spokane Transit Title VI Complaint Form

Spokane Transit does not discriminate in the provision of service on the basis of race, color, and national origin.

Should you require any assistance in completing this form, please let us know.

Complete and return this form to:

#### Ombudsman

Spokane Transit  
1230 West Boone Avenue  
Spokane, WA 99201

#### (Please Type or Print Clearly)

1. Complainant's name \_\_\_\_\_
2. Address \_\_\_\_\_
3. City, State, Zip code \_\_\_\_\_
4. Home phone number (\_\_\_\_) \_\_\_\_\_ (Cell or mobile number) (\_\_\_\_) \_\_\_\_\_
5. Email address \_\_\_\_\_
6. Are you the Complainant? \_\_\_ Yes \_\_\_ No  
If no, Your name \_\_\_\_\_  
Relationship to the Complainant \_\_\_\_\_  
Phone (\_\_\_\_) \_\_\_\_\_ Cell (\_\_\_\_) \_\_\_\_\_ Email \_\_\_\_\_  
Does the Complainant know you are filing this complaint? \_\_\_ Yes \_\_\_ No
7. Which of the following best describes the reason you believe the alleged discrimination took place?  
Select all that apply. Was it because of your:  
a. Race   
b. Color   
c. National Origin
8. Date of alleged discrimination (month/day/year) \_\_\_\_\_

9. In your own words, describe the alleged discrimination. Explain what happened and who you believe was responsible. Please use the back of this form if additional space is required.

---

---

---

10. Please give the name, mailing address, home phone number, and cell phone number for anyone who witnessed the alleged discrimination.

---

---

11. What would you consider an appropriate resolution to your complaint?

---

---

12. Have you filed this complaint with any other agency? \_\_\_ Yes \_\_\_ No

Agency Name \_\_\_\_\_

Agency Contact Person/Phone \_\_\_\_\_

13. Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

Complainant's Signature \_\_\_\_\_

Date (month/day/year) \_\_\_\_\_

**Within 15 working days of receiving the completed complaint, STA will acknowledge receipt of the complaint in writing. The letter will include information about the investigative steps to be taken and a timeline for resolution. If additional information is needed from the complainant, STA will request that information be provided in writing to append to the original complaint. A final letter of resolution will be sent to the complainant on completion of the investigation.**

**Upon request, alternative formats of this document will be produced for people who are disabled. Call (509) 325-6094 TTY 711 or email [ombudsman@spokanetransit.com](mailto:ombudsman@spokanetransit.com)**

### **SECTION 3 RECORD OF TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS**

## List of Title VI Investigations, Complaints, and Lawsuits

Based on 49 CFR Section 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the recipient.

Below is a list of lawsuits and complaints for 2017-2019

**Table 1 List of Title VI Investigations, Complaints, and Lawsuits**

	Date	Summary – Basis of Complaint	Status	Action(s) Taken
Lawsuit – Sway v. Spokane Transit Authority, et. al.	02/08/17	A Paratransit customer filed a lawsuit alleging that Spokane Transit had discriminated against her based on her race, in addition to other claims. The claims of racial discrimination were dismissed with prejudice on December 15, 2017. All remaining claims in the case were dismissed on October 11, 2018. The rider filed an appeal, and the Ninth Circuit Court of Appeals affirmed the dismissal of her claims on November 4, 2019. The rider filed a Petition for Panel Rehearing or Reconsideration on December 3, 2019 which the Ninth Circuit Court of Appeals unanimously denied on December 9, 2019.	Closed	None
Complaint	08/25/17	A fixed route rider alleged racial discrimination from drivers.	Closed	An investigation was conducted, including a review of audiovisual recordings. The complaint was unsubstantiated.
Complaint	06/27/18	An individual alleged that she was targeted by Transit Officers based on race.	Closed	An investigation was conducted including interviews and record review. The complaint was unsubstantiated.
Complaint	05/20/19	A homeowner alleged that a bus stop location in front of her home was selected because of her race.	Closed	An investigation was conducted including interviews and record review. The complaint was unsubstantiated.
Complaint	08/08/19	An individual alleged racial discrimination when asked for photo identification to use a credit card to make a pass purchase.	Closed	An investigation was conducted including interviews and record review. The complaint was unsubstantiated.

## **SECTION 4 COLLECTION OF DEMOGRAPHIC DATA**

## **Overview**

The following section is a demographic analysis of the population within Spokane Transit Authority's Public Transportation Benefit Area (PTBA). In order to be familiar with the low-income and minority demographics of the area, STA uses the most current and accurate data available from the US Census Bureau and the STA Rider Survey which is conducted every other year.

The service area defined for STA's Title VI Plan includes the cities of Spokane, Airway Heights, Cheney, Liberty Lake, Medical Lake, Millwood, and Spokane Valley, as well as limited unincorporated areas of Spokane County. In order to better understand the population within STA's PTBA, data was collected using U.S. Census Tracts partially or completely within the PTBA boundary. There are 105 census tracts within Spokane County, but only 98 tracts that intersect the PTBA boundary. The 7 tracts omitted from the Spokane County data did not fall within the PTBA boundary. These tracts were 102.01, 102.02, 103.01, 103.03, 103.04, 133, and 143. While this method of measurement does account for a small number of people outside of the geographic bounds of the PTBA, it was important to include these tracts, ensuring that the minority, low income and LEP populations were included in the demographic analysis.

The following data for minority populations was collected from the 2013-2017 American Community Survey (ACS) 5-year period estimates. In this report, "low-income" refers to people who are below the federal poverty threshold. To determine the low-income statistics, STA referred to the number people for whom poverty status could be determined that are below the poverty level for each census tract. An individual's federal poverty status is determined based on his or her annual household income and number of persons in his or her household. Under the to the Federal Poverty Thresholds for 2017, an individual under age 65 and living alone would be below the poverty line if he/she makes less than \$12,488 a year. Likewise, in a family of four with two children under 18, the household would have to make less than \$24,858 to be considered below the poverty line. The Census Bureau collects poverty data based on the thresholds established by the White House's Office of Management and Budget. These thresholds are adjusted each year to inflation.

Table 2 summarizes the minority and low-income populations of all the census tracts within Spokane Transit's PTBA, based on data from the 2017 5-year American Community Survey. Map 1 below is a base map of the PTBA and all the Spokane County census tracts that are contained within it.

### **Use of The Demographic Analysis**

In the early stages of planning service reductions or eliminations, the demographic analysis is used to identify areas that may be impacted by proposed changes. Map 1 shows current routing of the STA network and routes that travel through minority and low-income census tracts. This demographic data is a critical component of the equity analysis to determine if a disparate impact or a disproportionate burden exists on protected populations. In addition, outreach efforts can be targeted to areas with higher minority and low-income populations.

## **Demographic Analysis**

### **Service Area Calculation**

The service area defined for STA's Title VI Plan includes the cities of Spokane, Airway Heights, Cheney, Liberty Lake, Medical Lake, Millwood, and Spokane Valley, as well as limited unincorporated areas of



Spokane County. In order to better understand the population within STA’s PTBA, data was collected using U.S. Census Tracts partially or completely within the PTBA boundary. There are 105 census tracts within Spokane County, but only 98 tracts that intersect the PTBA boundary. The 7 tracts omitted from the Spokane County data did not fall within the PTBA boundary. These tracts were 102.01, 102.02, 103.01, 103.03, 103.04, 133, and 143. While this method of measurement does account for a small number of people outside of the geographic bounds of the PTBA, it was important to include these tracts, ensuring that minority and low-income populations were included in the demographic analysis. Minorities and low-income persons may use transit to reach destinations throughout the PTBA including employment, colleges and universities, health clinics, and housing.

Table 2 below provides a summary of low-income and minority populations residing within the STA service area.

**Table 2 Minority and Low-income Population Summary**

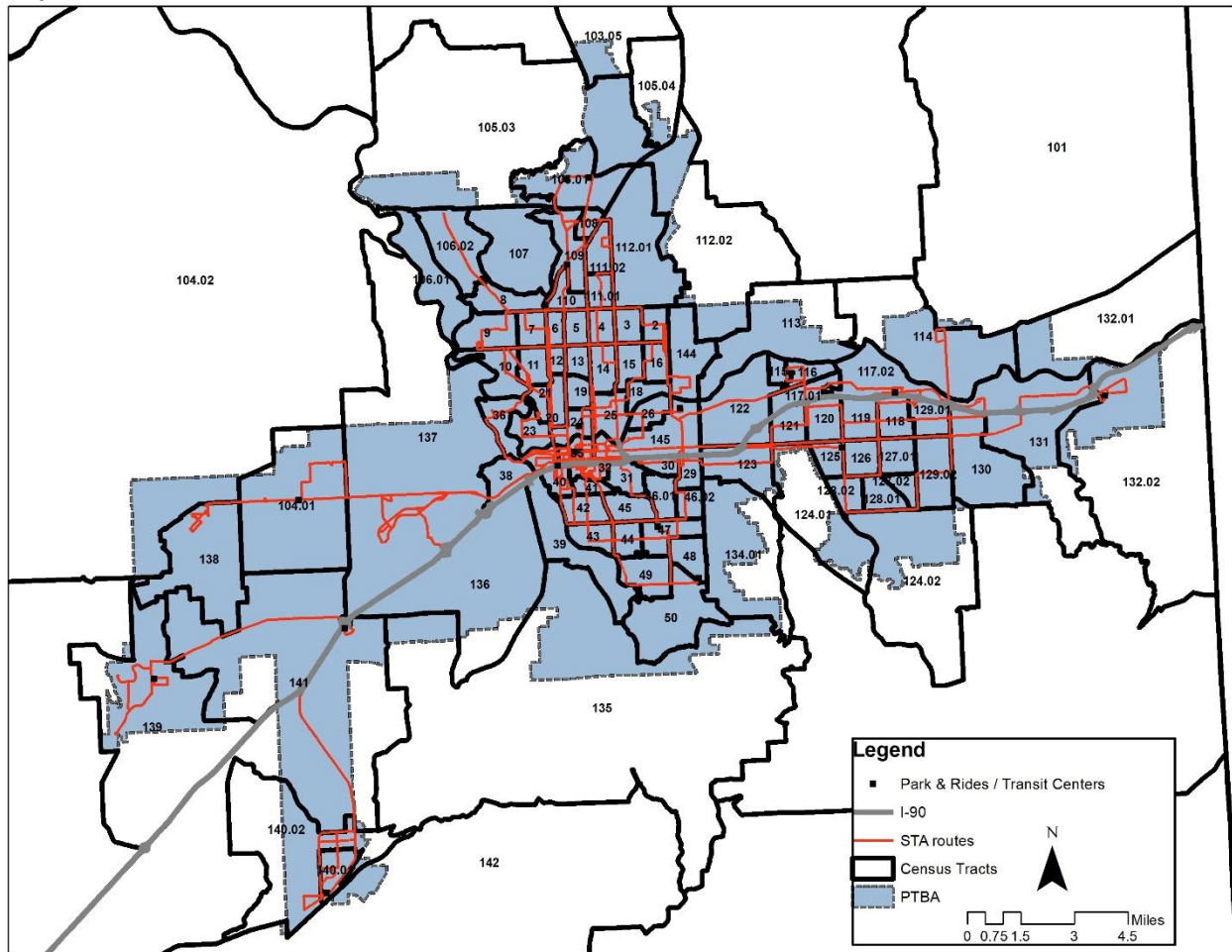
2019 STA PTBA Population Estimate*	Census Estimate of PTBA Population	Census Estimate of PTBA Minority Population	Percent Minority	Census Estimate of PTBA Low-Income Population**	Percent Low-Income**
436,261	461,063	70,789	15.4%	69,581	15.6%

Source 2013-2017 ACS 5- Year Estimates

\*Source: Washington State Office of Financial Management, Forecasting and Research Division

\*\*The low-income population and percentage were calculated based upon the number of people who answered both questions regarding household size and household income in the 2013-2017 ACS 5-Year estimates (446,451).

Map 1 STA PTBA with Census Tracts



Source: 2013-2017 ACS 5-Year Estimates

Table 3 below lists the census tracts within the PTBA that exceeded the total percent minority population of all the census tracts that intersect the PTBA (15.4%). Map 2 shows these tracts. The tract with the highest percent minority is Tract 30 with 43.2 % (1,098 out of 2,541), in the City of Spokane’s East Central Neighborhood, an area that is well served by fixed route transit to Downtown, Spokane Community College (SCC), and other areas.

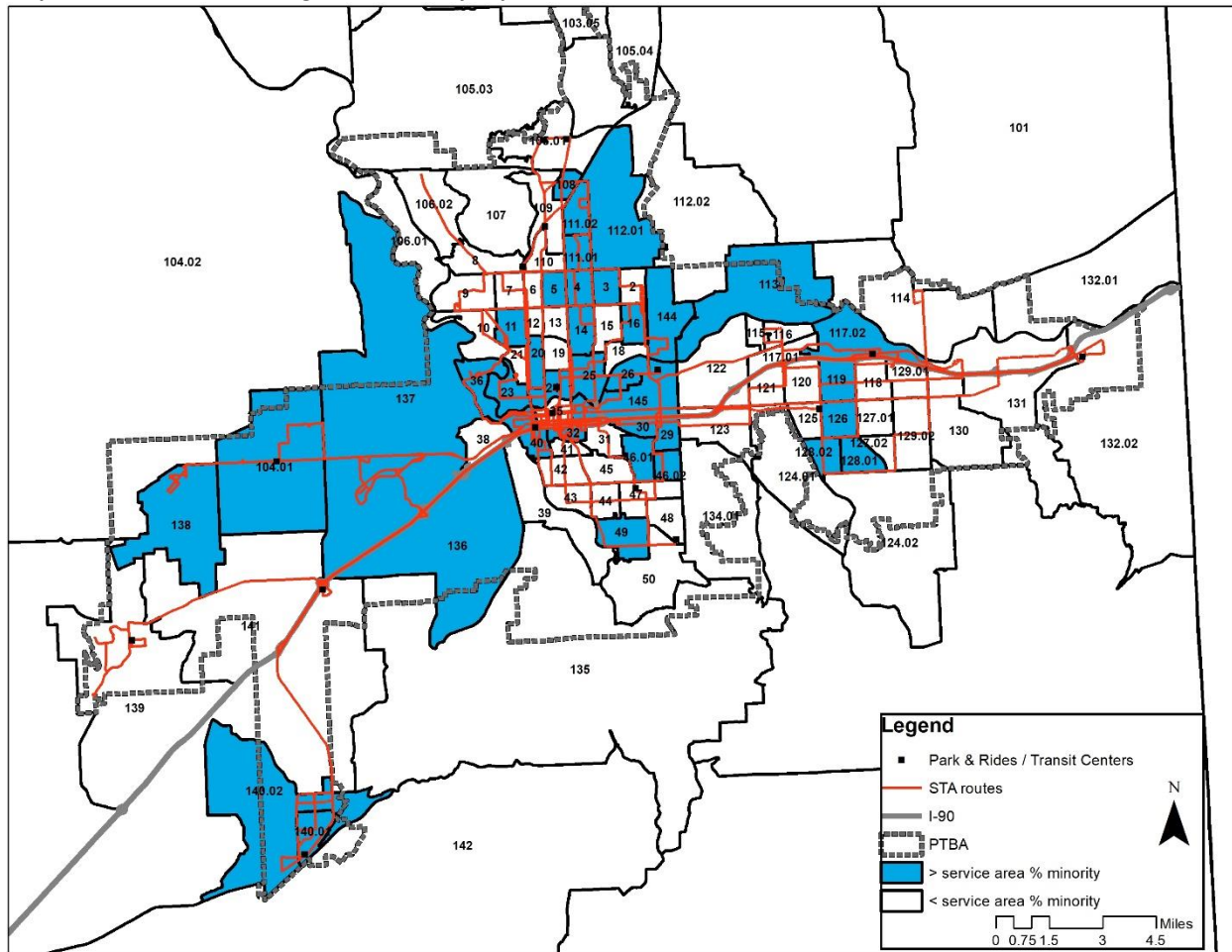
Table 3 Census Tracts Exceeding 15.4% Minority Population

Source: 2013-2017 ACS 5-Year Estimates

Census Tract	Total Population	Minority Population	% Minority	Location Notes
30	2,541	1,098	43.2%	East Central Neighborhood in Spokane
26	5,579	2,389	42.8%	Chief Gary Park Neighborhood in North Spokane
104.01	6,843	2,279	33.3%	Airway Heights
24	2,979	950	31.9%	Central Spokane
138	2,960	930	31.4%	Fairchild Air Force Base
111.01	6,454	1,916	29.7%	Nevada/Lidgerwood Neighborhood in North Spokane

Census Tract	Total Population	Minority Population	% Minority	Location Notes
40	5,067	1,453	28.7%	Cliff/Cannon Neighborhood of Spokane
46.02	3,116	886	28.4%	Lincoln Heights Neighborhood in South Spokane
4	4,157	1,131	27.2%	Nevada/Lidgerwood Neighborhood in North Spokane
14	5,954	1,615	27.1%	Nevada/Lidgerwood and Logan Neighborhoods in North Spokane
145	2,035	515	25.3%	East Central and Chief Garry Park Neighborhoods in Spokane
140.01	5,355	1,330	24.8%	Cheney
111.02	4,455	1,081	24.3%	Nevada/Lidgerwood Neighborhood in North Spokane
16	3,474	834	24.0%	Bemiss Neighborhood in North Spokane
144	4,619	1,101	23.8%	Minnehaha and Hillyard Neighborhoods
36	4,345	1,035	23.8%	Browne's Addition, Peaceful Valley and West Hills Neighborhoods of Spokane
112.01	7,284	1,726	23.7%	Shiloh Hills Neighborhood in Spokane
20	3,971	928	23.4%	West Central and Emerson/Garfield Neighborhoods in Spokane
137	3,200	728	22.8%	West Plains of Spokane and Spokane County
117.02	6,146	1,311	21.3%	North Spokane Valley
25	8,339	1,699	20.4%	Logan Neighborhood in Spokane
140.02	5,975	1,204	20.2%	Cheney
5	3,417	679	19.9%	North Hill Neighborhood in Spokane
126	4,313	854	19.8%	Opportunity area of Spokane Valley
32	2,579	508	19.7%	Cliff/Cannon and East Central Neighborhoods in Spokane
23	5,727	1,125	19.6%	West Central Neighborhood in Spokane
46.01	3,603	703	19.5%	Lincoln Heights Neighborhood in Spokane
49	5,561	1,072	19.3%	Southgate Neighborhood in Spokane and Moran Prairie area of Spokane County
3	4,862	894	18.4%	Nevada/Lidgerwood and Whitman Neighborhoods in North Spokane
11	3,449	595	17.3%	Audubon/Downriver Neighborhood in Spokane
29	2,888	489	16.9%	East Central Spokane
136	4,918	832	16.9%	Grandview/Thope in South Spokane and Geiger Heights in Spokane County
128.02	3,404	569	16.7%	Dishman area of Spokane Valley
128.01	4,163	663	15.9%	Dishman area of Spokane Valley
119	4,315	686	15.9%	Opportunity area of Spokane Valley
108	2,026	316	15.6%	North Spokane at the Division Street Y

**Map 2 Census Tracts Exceeding 15.4% Minority Population**



Source: 2013-2017 ACS 5-Year Estimates

Table 4 below lists the census tracts that intersect the PTBA that exceed the total percent low-income of 15.6% in the PTBA. Map 3 shows the location of these tracts. The tract with the highest proportion low-income is Tract 35 with 50.9% (1,144 out of 2,248), located in the central business district where most of the routes connect at the STA Plaza.

**Table 4 Census Tracts Exceeding 15.6% Low-Income**

Source: 2013-2017 ACS 5-Year Estimates

Census Tract	Population for Whom Low-Income Status is Determined	Low-Income Population	% Low-income	Location Notes
35	2,248	1,144	50.9%	Downtown Spokane
25	5,383	2,542	47.2%	Logan Neighborhood Spokane
140.01	3,642	1,587	43.6%	Cheney
24	2,018	874	43.3%	Central Spokane

Census Tract	Population for Whom Low-Income Status is Determined	Low-Income Population	% Low-income	Location Notes
145	2,025	850	42.0%	East Central and Chief Garry Park Neighborhoods in Spokane
140.02	5,926	1,948	32.9%	Cheney
111.01	6,294	1,981	31.5%	Nevada/Lidgerwood Neighborhood in North Spokane
20	3,946	1,237	31.3%	West Central and Emerson/Garfield Neighborhoods in Spokane
36	4,321	1,352	31.3%	Browne's Addition, Peaceful Valley and West Hills Neighborhoods of Spokane
3	4,851	1,471	30.3%	Nevada/Lidgerwood and Whitman Neighborhoods in North Spokane
16	3,461	1,036	29.9%	Bemiss Neighborhood in North Spokane
26	5,569	1,662	29.8%	Chief Gary Park Neighborhood in North Spokane
2	4,692	1,383	29.5%	Hillyard Neighborhood in North Spokane
30	2,541	716	28.2%	East Central Neighborhood in Spokane
23	5,705	1,456	25.5%	West Central Neighborhood in Spokane
112.01	7,186	1,820	25.3%	Shiloh Hills Neighborhood in Spokane
108	1,916	478	24.9%	North Spokane at the Division Street Y
18	2,553	634	24.8%	Northeast Spokane
118	4,587	1,130	24.6%	Veradale area of Spokane Valley
4	3,989	898	22.5%	Nevada/Lidgerwood Neighborhood in North Spokane
123	5,418	1,210	22.3%	Southwest Spokane Valley
31	4,651	994	21.4%	East Central Neighborhood of Spokane
32	2,277	482	21.2%	Cliff/Cannon and East Central Neighborhoods in Spokane
111.02	4,347	910	20.9%	Nevada/Lidgerwood Neighborhood in North Spokane
117.02	6,146	1,269	20.6%	North Spokane Valley
40	5,042	1,034	20.5%	Cliff/Cannon Neighborhood of Spokane
19	3,551	721	20.3%	Emerson/Garfield Neighborhood in Spokane
144	4,609	910	19.7%	Minnehaha and Hillyard Neighborhoods
21	2,497	487	19.5%	Northwest and Emerson/Garfield Neighborhood in Spokane
142	3,425	664	19.4%	Southeast Cheney and the Dynamite area of Spokane County (most of this tract not in service area)
13	3,403	656	19.3%	North Hill Neighborhood in Spokane

Census Tract	Population for Whom Low-Income Status is Determined	Low-Income Population	% Low-income	Location Notes
7	4,642	886	19.1%	Northwest Neighborhood Spokane
14	5,934	1,129	19.0%	Nevada/Lidgerwood and Logan Neighborhoods in North Spokane
104.01	3,790	721	19.0%	Airway Heights
11	3,413	649	19.0%	Audubon/Downriver Neighborhood Spokane
127.01	4,016	759	18.9%	Opportunity area of Spokane Valley
129.01	3,424	622	18.2%	Veradale area of Spokane Valley
5	3,389	614	18.1%	North Hill Neighborhood Spokane
12	2,500	429	17.2%	North Hill Neighborhood Spokane
6	3,138	534	17.0%	North Hill Neighborhood Spokane
126	4,313	715	16.6%	Opportunity area of Spokane Valley
101	6,130	1,007	16.4%	East Valley area of Spokane Valley
47	6,725	1,103	16.4%	Lincoln Heights and Southgate Neighborhoods Spokane
120	3,646	596	16.3%	Opportunity area of Spokane Valley
46.01	3,525	574	16.3%	Lincoln Heights Neighborhood Spokane
131	11,234	1,800	16.0%	Greenacres area of Spokane Valley



## **Passenger Survey**

Below is a description of the October 2018 STA Title VI Passenger Survey and a summary of the findings from the survey. Included in Attachment A is the sample survey distributed to transit riders and the survey results.

### **2018 STA Passenger Survey**

Spokane Transit Authority (STA) conducted its most recent Title VI Passenger survey in October of 2018. This survey is used to determine which fare types have a higher use among minority and low-income riders. In addition, the objectives of the survey explored ridership behaviors of bus passengers, determined the leading reasons for riding the bus, and evaluated STA service and performance.

### **Methodology**

STA contracted with Robinson Research to tabulate data and analyze the results of the passenger survey. A total of 1,677 STA bus passengers completed a two-page survey on one of 37 STA bus routes during the weekday and/or weekend. The number of surveys administered per route was determined based on actual number of passenger trips for each route, on all days of the week. 32 bus routes were sampled during weekdays from 7 AM to 9 PM and weekends from 10 AM to 6 PM. Not all routes had enough ridership to justify surveying, such as to EWU from Park and Rides AM peak only express routes. The routes with the highest ridership had higher questionnaire quotas than those with fewer riders. On-board surveys were conducted from October 22<sup>nd</sup> through October 28<sup>th</sup>. Questionnaires were distributed until the target quota for that route was met. Survey responders returned the survey before leaving the bus.

Copies of the survey were available in English, Spanish, Russian, and Vietnamese, which are the safe harbor languages for Spokane Transit's PTBA.

### **Passenger Survey Conclusions**

The conclusions listed below reflect the survey as it relates to minority and low-income populations.

Based on the sample data gathered for this survey, 31% that responded to the survey were minorities and 47% were low-income. Low-income was measured by comparing the income bracket and household size reported by individuals with the 2018 Federal poverty guidelines. Respondents who reported a median income at or below the poverty threshold for their household size were considered low-income for the purpose of this analysis.

Based on the results of the survey the Adult 31-day pass is the most commonly used pass among all riders, followed by the 2-Hour Pass, 31-day reduced fare, Day Pass, EWU card and Youth 31-Day Pass. Passes were most likely to be paid by cash, followed by school provided, credit/debit card or provided by an employer. Those who considered themselves African American were more likely to have paid by cash. Most passes were purchased at the customer service counter at the STA Plaza. Most low-income respondents paid for their fare with cash. A higher-than-average rate in this case is defined as usage of any one fare type by minority or low-income respondents that is 10% higher than the percentage of all surveyed riders that are minority or low-income. Type of pass and fare payment were consistent for low-income as compared to all riders that were surveyed. For example, low-income fare payment was 49% cash as compared to all respondents with 43% cash. In terms of pass type, 33% of low-income



riders purchased a 31-day pass, whereas 32% of all riders purchased that type of pass. There was no higher than average rate of pass type or method of fare payment for low-income. For ethnic identification, 74% of respondents were Caucasian with 31% responding as a minority.

**SECTION 5 PUBLIC PARTICIPATION PLAN**

## **Overview**

To encourage public participation in Spokane Transit planning activities, the STA Board of Directors adopted a list of Communication Public Outreach goals, principles, and policies as part of the STA comprehensive plan, *Connect Spokane*, in September 2010 and revised on May 16, 2019. These policies are incorporated into the Title VI program. STA will apply these adopted measures when performing outreach efforts to minority, low-income, and limited English proficient (LEP) populations and will use the appropriate outreach tools depending on the scale of projects including major service and fare changes.

## **Communications and Public Input**

*The following Goals, Principles, and Policies were adopted by the STA Board of Directors as part of STA's Connect Spokane Comprehensive Plan.*

As a public agency, Spokane Transit Authority believes that proper communications and public input is of the highest importance. To ensure transparency, accountability, and fairness, STA must use a broad range of communication tools to reach as many people as possible. As technology improves, the amount of information available and the speed at which it can reach those interested increases daily, creating both opportunities and challenges. Fortunately, STA is able to use a variety of communications tools to both inform and gather information. The following list is not intended to be a complete list of communications tools which may be used but a sample of some strategies that STA may use for a variety of purposes. (Connect Spokane page 71, along with the Table 5 below).

**Table 5 Public Outreach Tools**

<b>Outreach Tool</b>	<b>Definition</b>
Public Hearing	A meeting during which public testimony may be heard and formal action may be taken on any measure before the STA Board of Directors
Legal Notice	Public posting or advertising in newspapers to announce a legal action or intent
Display Ads in Newspaper	Paid advertisement in the newspaper to alert readers about an upcoming event or action
Website/Online Social Media	Updates to the website and social media are quick and efficient ways of getting notice to the public quickly
Mobile Device Alerts	Real-time information can alert customers to important real-time information
Signs	Signs on buses, at stop locations, and at transit centers can help to reach people who use transit services
Rider Alerts	Notifications of route, frequency, or other information that is of particular interest to riders
Direct Mailings	Mail sent to an affected group or area to educate, notify, or request input
Workshops/Open Houses/Town Halls	Types of meetings where staff and public interact and discuss various issues
Surveys (scientific and self-selected)	Surveying opinions and ideas can help public agencies understand how to better serve the constituency
On-board Information	Pamphlets and posters that alert riders to information
Displays at Transit Centers	Permanent or temporary displays at transit centers are able to reach a large number of system riders
SEPA	The public outreach requirements of Washington State’s State Environmental Protection Act (SEPA) can be an effective tool for communicating with the public about proposed actions

## Communications and Public Input Goal

STA will promote openness, honesty, and fairness through appropriate public outreach efforts.

(Connect Spokane page 72)

## Communications and Public Input Principles

These principles (Connect Spokane pages 72-73) describe the foundation for the policies found in this element:

### 1. Continuous Communication

***Open, honest, early, and continuous communication with all stakeholders increases public confidence in STA.***

Changes in STA's operations impact many stakeholders, both within and outside of the agency. For this reason, care should be taken to ensure all stakeholders are identified and remain well-informed.

### 2. Accountable

***A public account of decisions made and responses to public input regarding these decisions increases STA's accountability to its customers.***

Thorough recordkeeping helps to ensure a common understanding of decisions, policies, and responses. Sharing records with the public demonstrates the transparency with which STA conducts its business.

### 3. Accessible Information

***Providing access and non-technical explanations of relevant reports, records, and documents demonstrates STA's commitment to transparency.***

STA conducts its business in a fair, honest, and legal manner. For that reason, providing access to relevant documents broadens the public's perception of STA's high operating standards.

### 4. Two-way Communications

***Consideration of the views of regulators, stakeholders, and the general public in making decisions demonstrates STA's commitment to fairness and equity.***

Transit agencies exist to serve the community. To that end, community members have the right to share their views regarding transit service.

### 5. Timely

***The provision of sufficient time for full public participation, including advance notice of activities and steps in the public process, demonstrates fairness and respect.***

Scheduling events and the overall public process with an appreciation of today's busy lifestyles allows for the broadest public participation process possible.

### 6. Purposeful

***Questions pertinent to issues under consideration should be answered by knowledgeable staff.***

One can appreciate the frustration stemming from poorly-answered questions. Providing complete, accurate information increases the public's confidence in STA.

## **Communications and Public Input Policies**

(Note: These Public Input Policies [Connect Spokane pages 73-77] will apply when planning outreach efforts to engage low-income, minority, and LEP populations, along with other affected or disadvantaged groups and the general public.)

### **CI-1.0 – Public Outreach**

The following policies are intended to serve as a guide describing public outreach/input requirements for each action. In cases where there are federal or state requirements for public outreach/input, STA will meet the minimum requirements. In cases where STA has requirements in addition to those defined by the state or federal government, STA will follow both.

#### **1.1 Service Changes**

***In addition to following Federal Transit Administration guidelines for public outreach for service reductions, STA will also comply with the policy found in the following table.***

How to read the following table:

- 1) Determine cost and ridership impacts.
- 2) Consider exceptions.
- 3) The more severe cost or ridership impact determines the category (ex. Cost impacts fall into Category II but ridership impacts fall into Category I, follow the decision making and input/outreach process of Category II)

Any fixed-route adjustment or elimination which would change the paratransit boundary enough to eliminate service from at least one active customer\* will trigger a Category II process.

\*Active customer is someone who has used paratransit services within a year of the public hearing date.

Table 6 Public Input Policies

<b>Public Input Categories</b>			
	<b>I-Minor</b>	<b>II-Moderate</b>	<b>III-Major</b>
<b>Determining Threshold</b>	<p>Less than 1.0% growth or reduction in revenue hours of service in any calendar year</p> <p>OR</p> <p>Less than .5% of annualized system ridership negatively impacted by loss of bus stop, trips or route at any given service change</p>	<p>1.0% up to 5.0% reduction or 1.0% - 10% growth in revenue hours of service in any calendar year</p> <p>OR</p> <p>.5% up to 5.0% of annualized system ridership negatively impacted by loss of bus stop, trips or route at any given service change</p>	<p>More than 5.0% reduction or more than 10% growth in revenue hours of service in any calendar year</p> <p>OR</p> <p>5% or more of annualized system ridership negatively impacted by loss of bus stop(s), trip(s) or route(s) at any given service change</p>
<b>Resulting Actions</b>	<p>Construction-related or emergency changes necessary for a period not exceeding 180 days for changes that would otherwise be moderate or major</p> <p>Employee and customer input, etc. Documented informal outreach for feedback on changes; may include survey or other tools</p> <p>CEO or designee; staff report detailing changes submitted to the Board prior to changes going into effect (except for exceptions that are reported at least 30 days after)</p>	<p>Changes that would normally be classified as minor changes, but require a higher classification because of significant public interest or board involvement</p> <p>Outreach activities including driver and rider input, surveys, meetings with community groups, or other tools. Report to Board on activities.</p> <p>Public hearing prior to Operations Committee and Board action.</p>	<p>None</p> <p>Public Outreach Plan approved by Board in advance of outreach, which may include outreach to affected community groups, employers, etc.</p> <p>At least one public hearing. Board action following Operations Committee recommendation with Title VI report.</p>
<b>Examples</b>	<ul style="list-style-type: none"> <li>• Running time adjustments</li> <li>• Departure time adjustments</li> <li>• Minor bus reroutes</li> <li>• Changes to bus stop locations (Per CI 1.4)</li> </ul>	<ul style="list-style-type: none"> <li>• Significant route changes</li> <li>• Addition or deletion of service to a large area</li> </ul>	<ul style="list-style-type: none"> <li>• A large service reduction</li> <li>• A restructure of the network</li> </ul>

Communications and Public Input

## 1.2 Fare Increases

***Fare increases of more than 10% in any three-year period shall be considered through the public outreach process as a Category III-Major Change as defined in Policy 1.1. For cumulative changes, the Category III-Major Change public process will only be applied to the increase which breaks the 10% threshold, not the previous increases.***

## 1.3 Grants

Table 7 Public Process for Grants

Grant Condition	Public Process
Grants in Capital Improvement Program (CIP)	Adoption of CIP will serve as the public process
Grants applications less than \$1 million*	Notice on STA's website
Grants applications at least \$1 million*	Adoption by Board of Directors

\*If grant application project is not contained in the Capital Improvement Program

## 1.4 Stop Changes

***If the cumulative stop changes that take place within a calendar year affect the boardings of 10% of a route's annual ridership, STA will use the tools described in the beginning of this element to gather public input before a final decision is made.***

A stop serves as the point at which a rider can access the transit service. The placement of this access is important for the rider, driver, and riders already on board. STA is continually evaluating stop locations along all transit routes by considering safety, stop spacing, and proximity to destinations.

## 1.5 Transit Development Plan

***STA will hold at least one public hearing while developing its program for each annual update.***

As a public transportation benefit area authority in Washington State, STA is required to prepare a six-year transit development plan (TDP) and annual report. This document provides updated information to the Washington State Department of Transportation on the various activities of STA. The TDP can be found here: <https://www.spokanetransit.com/projects-plans/transit-development-plan>.

## 1.6 Comprehensive Plan

***STA will undertake public outreach efforts for subsequent updates to the Comprehensive Plan and allow an opportunity for public testimony prior to any substantive amendments.***

Any change which affects the substance of the Comprehensive Plan will require a public hearing and supporting public outreach.

## 1.7 Disadvantaged Business Enterprise (DBE)

***The DBE goals will be available on STA's website for no less than 15 days prior to adoption by the Board.***



### **1.8 Title VI Reporting**

***During major service reductions and fare increases, STA will conduct an analysis to verify that no discrimination of protected classes takes place.***

Title VI provides that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

### **1.9 Major Capital Projects**

***During the annual Capital Improvement Program (See System Infrastructure Policy 4.0) update process, which identifies all major capital projects, appropriate public outreach and a public hearing shall take place prior to adoption. Amendments to the Capital Improvement Program will follow a similar process.***

Any capital project requiring board approval and outside of the normal budgeting process shall be subject to a public hearing to receive public input and testimony.

### **1.10 HPT Corridor Planning**

***During any Alternatives Analysis for a High Performance Transit corridor, STA or its consultant will develop a public outreach plan to both gather input and provide information about the project being evaluated.***

### **1.11 Budget**

***STA shall hold at least one public hearing prior to the adoption of the annual budget.***

Each year the Board of Directors adopts an annual budget that outlines how the agency intends to spend tax, fare, grant and advertising monies.

### **1.12 NEPA/SEPA/Environmental outreach**

***Where appropriate or required, STA shall incorporate public outreach and SEPA and NEPA evaluations, with the intent to exceed minimum requirements.***

### **1.13 Major Construction Projects**

***STA shall hold at least one public hearing prior to the adoption of the annual budget.***

Each year the Board of Directors adopts an annual budget that outlines how the agency intends to spend tax, fare, grant and advertising monies.

## **CI—2.0 Service Communication**

### **2.1 Branding**

***All branding shall be part of a coordinated system-wide branding plan developed to better the customer experience.***

Effective branding can help the customer by conveying simple messages about frequency, span, destinations, and connectivity. By creating a larger branding plan, STA will be consistent with branding styles and purposes.

## **2.2 Technology**

***Use improving technology to increase the amount of ridership information available to customers.***

By using new and existing technologies, STA can increase ridership by creating a more pleasant experience for transit riders. Technology can decrease wait time, improve decisions about mode choice, increase safety, etc.

## **2.3 Public Education**

***Invest resources in educating existing and potential customers about travel options.***

STA offers a variety of transportation services (i.e. fixed-route, paratransit, rideshare) that assist in providing solutions to many different customer needs. By investing in education, STA can help customers ensure that they are best utilizing the transportation services which STA provides.

## **Public Outreach Techniques for Title VI Populations**

Depending on the project, STA may use a variety of different outreach techniques to engage Title VI populations. Some of these include:

- Providing information with meeting notices on how to request translation assistance
- Visualization techniques including maps and graphics to assist Title VI populations
- When multiple meetings are held for a single subject, efforts are made to use different meeting locations, days of the week, and times of the day
- Informing organizations within the community that work closely with low income and minority populations to inform the public of meetings, open houses, and other STA activities
- Published notices in minority newspapers
- Targeted ads on Facebook and Twitter
- On board rider survey to gather demographic data

## **Summary of Public Outreach and Involvement**

Spokane Transit has conducted numerous public outreach efforts to the general public and targeted outreach efforts to limited-English populations, low-income and minority groups. Below is a listing of some of these activities by project or mode for the last 3 years. Please note this is not an exhaustive list but rather a summary of activities.

## **Mobility Training and Mobility Mentor Program**

Spokane Transit offers a Mobility Mentor Program that helps seniors, people with disabilities and other groups learn to confidently ride the bus. Mobility Training is a free Spokane Transit program that helps individuals gain more independence by assisting them in becoming fixed route bus riders. Participants are familiarized with how the system works, from bus routes to ticketing, and most importantly, how the system can work for their specific needs. The mobility trainers meet with groups that are interested in learning about transit. Below is a list of organizations that the mobility mentors have met with over the last three years.

**Table 8 List of Organizations Involved in Mobility Mentor Program**

<b>Organization</b>	<b>Targeted Population</b>
Appleway	Low-income
Applewood Apartments	Low-income Housing
Bernadette Place	Low-income Housing
Buder Haven	Low-income Housing
Canterbury Courts Apartments	Low-income, Senior Housing
Cathedral Plaza Apartments	Low-income Housing
Catholic Charities	Service Provider
Clare View Retirement Community	Low-income, Senior Housing
Corbin Senior Center	Senior Activities
Country Heights Apartments	Low-income Housing
Department of Social and Health Services	Public Assistance
Grace Court Apartments	Low-income, Senior Housing
Heritage Heights	Low-income, Senior Housing
HiFumi En	Senior, Disabled, Low-Income Housing
Hope House	Low-income Housing
Lilac Plaza Retirement Home	Low-income, Senior Housing
Lilac Terrace Retirement Community	Low-income, Senior Housing
Manito Gardens	Low-income, Senior Housing
Maplewood Gardens	Senior Housing
Mid-City Concerns	Senior, Low-income Service Provider
Park Towers Apartments	Low-income, Affordable Housing
Ponderosas Apartments	Senior Housing
Refugee Connections	Minority, LEP
Salvation Army	Service Provider
SNAP	Service Provider
The Delaney Apartments	Low-income Housing
The O'Malley Apartments	Senior, Disabled Housing
The Parsons Apartments	Senior, Disabled, Low-Income Housing
The Vintage Apartments	Senior Housing
World Relief	Minority, LEP
YMCA	Service Provider
YWCA	Women, Low-income Service Provider

## Project Specific Outreach

Spokane Transit may conduct project specific outreach for low-income, limited-English proficiency and minority groups during the public input phase of the project. Notable examples of this outreach include:

- Sending notice of online public surveys to an agency-maintained distribution list (for limited English proficiency, minority and low-income groups),
- Placing the Title VI non-discrimination notice on fliers and invitations to outreach events. If space is limited, this may only include the statement “*If information is needed in another language, contact (509) 325-6094*”, translated into the safe harbor languages. Examples of this type of outreach include,
  - Central City Line: In-Person and/or Online Open Houses in October 2017, January 2018, February 2019,, and service provider roundtable design discussion in February 2018.
  - Monroe-Regal: Online and in-person open house, September 2018
  - Service Changes 2020-2022: Online open house, October-November 2019
- Outreach and sponsorship at community events that interact with minority, low-income and limited English populations. Examples include, Unity in the Community (2019), Valleyfest and Bloomsday.
- Collection of demographic data at outreach events to understand what groups are participating. For example,
  - The Central City Line online and in-person open house hosted from October 2017 to October 2019. STA collected information from the respondents on their ethnicity, age, gender, place of residence, and transportation choices.
  - The 2020-2022 Service Changes online workshop collected information on what languages are spoken at home, place of residence, age and transportation choices. This workshop collected responses from October 10, 2019 through November 7, 2019.
  - The 2020-2022 Service Change outreach efforts included Rider Roundtables. Riders from specific geographic regions were asked to attend a roundtable event that included a workshop on potential service changes. Attendees were thanked for their service with a free 31-day bus pass. Children were accommodated at the meeting with snacks and activities. The date, time and location for each roundtable was selected by the group to ensure the highest number of attendees were able to participate. At these events a survey was collected on the income, race, geographic location, and ethnicity of the participants.
  - October 2019 Service Providers Survey was mailed to organizations.
  - September 2018 On Board Passenger Survey conducted. This survey was available in the three safe harbor languages.

**SECTION 6 LIMITED ENGLISH PROFICIENCY ANALYSIS AND LANGUAGE  
ASSISTANCE PLAN**

## **Introduction**

Spokane Transit Authority (STA) has conducted a Four-Factor Analysis to meet the requirements under Title VI of the Civil Rights Act of 1964. The Four-Factor Analysis provides a framework to conduct a needs assessment of people with Limited English Proficiency (LEP). Based on the needs assessment, a language assistance plan was developed that was consistent with the provisions of Section VII of the LEP guidance.

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. In *Lau v. Nichols*, 414 U.S. 563 (1974), the U.S. Supreme Court interpreted Title VI regulations as prohibiting conduct that has a disproportionate effect on persons with Limited English Proficiency (LEP) because such conduct constitutes national origin discrimination.

According to the Federal Transit Administration Office of Civil Rights handbook dated April 13, 2007, *Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers*, "Individuals, who have a limited ability to read, write, speak, or understand English are limited English proficient or 'LEP.'"

## **The Four-Factor Analysis**

This analysis will identify and answer four questions to assist in the development of the Language Assistance Plan and determine the level of LEP assistance needed. These four questions are as follows:

- What is the number and proportion of LEP persons served or encountered in the eligible service population?
- What is the frequency with which LEP individuals come into contact with a STA program, activity, or service?
- What is the nature and importance of the program, activity, or service provided by Spokane Transit Authority to the LEP community?
- What are the resources available to Spokane Transit Authority and overall costs?

## **Four-Factor Summary**

Within the STA service area, LEP persons represent 2.9% of the total population. Of that LEP population, 3.4% commute mainly by transit. STA estimates that for the LEP population within the service area, 46% rely on transit service a lot, while 31.9% rely on transit a moderate amount. Based upon these findings, STA has concluded that extensive outreach to LEP populations provides minimal results. There are few LEP people within the STA service area, and only a small portion of them use public transit. There are many services within the community that work with LEP populations in order to assist them in how to use the bus. In conclusion, the appropriate level of outreach is minimal, but includes, targeted notifications to LEP organizations (depending on the project), language translation upon request, website translation, and staff training.

## **Service Coverage**

The service area defined for STA's Title VI Plan includes the cities of Spokane, Airway Heights, Cheney, Liberty Lake, Medical Lake, Millwood, and Spokane Valley, as well as limited unincorporated areas of Spokane County. In order to better understand the population within STA's PTBA, data was collected using U.S. Census Tracts partially or completely within the PTBA boundary. There are 105 census tracts within Spokane County, but only 98 tracts that intersect the PTBA boundary. The 7 tracts omitted from the Spokane County data did not fall within the PTBA boundary. These tracts were 102.01, 102.02, 103.01, 103.03, 103.04, 133, and 143. While this method of measurement does account for a small number of people outside of the geographic bounds of the PTBA, it was important to include these tracts, ensuring that LEP populations were included in the demographic analysis. LEP persons may use transit to reach destinations throughout the PTBA including employment, colleges and universities, health clinics, and housing.

## **Methods of Data and Information Gathering:**

- Collected census data on LEP populations by census tract (Table 9), language spoken (Table 10), and transportation mode (Table 11) for the PTBA
- Sent an electronic letter to a list of service providers working with LEP populations in Spokane County and asked them to participate in an online survey through Survey Monkey or paper

response. STA received 76 responses from 31 different organizations. The letter to service providers along with a sample survey, and the results are included in Attachment B.

**Factor 1: The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population.**

**Census Overview**

Individuals demonstrating a limited ability to read, write, speak, or understand English are considered to have limited-English proficiency. According to the 2017 American Community Survey (ACS), 12,528 of the 432,221 people within the PTBA reported speaking English “less than very well”, or 2.9% (Table 9). Map 4 shows the percent of LEP population within the PTBA by census tract.

**Table 9 PTBA LEP Population by Census Tract**

Census Tract	Population 5 Years and Over		
	Speak English less than "very well"		
	Total	Estimate	Percent
2	4,392	122	2.8%
3	4,610	86	1.9%
4	3,731	147	3.9%
5	3,127	13	0.4%
6	2,880	62	2.2%
7	4,249	24	0.6%
8	4,600	10	0.2%
9	6,011	56	0.9%
10	5,385	31	0.6%
11	3,204	14	0.4%
12	2,237	27	1.2%
13	3,171	73	2.3%
14	5,532	363	6.6%
15	4,952	189	3.8%
16	3,263	522	16.0%
18	2,475	105	4.2%
19	3,346	24	0.7%
20	3,722	49	1.3%
21	2,389	10	0.4%
23	5,292	12	0.2%
24	2,878	35	1.2%
25	8,000	88	1.1%
26	5,232	904	17.3%
29	2,636	129	4.9%
30	2,354	269	11.4%
31	4,402	273	6.2%
32	2,543	-	0.0%

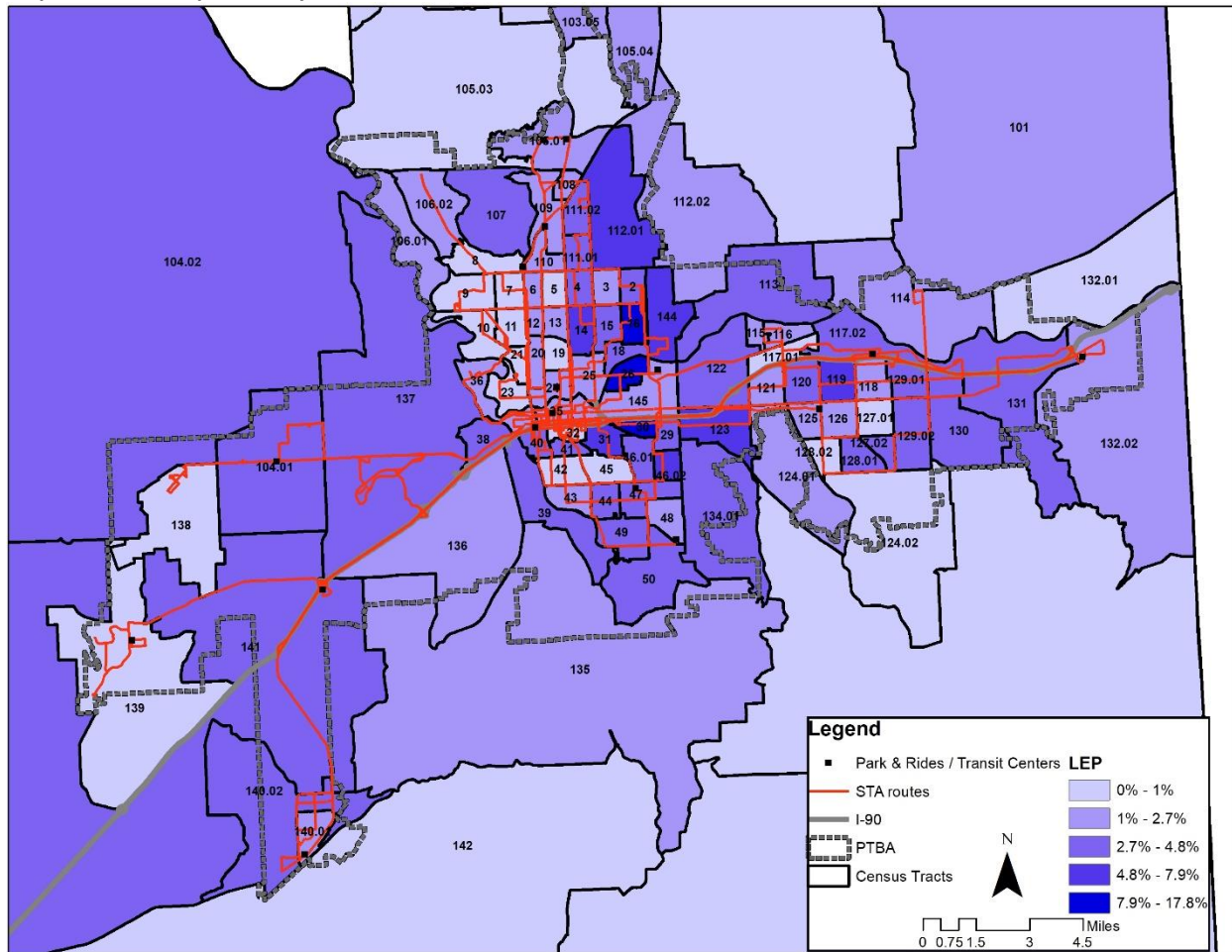


Census Tract	Population 5 Years and Over		
	Speak English less than "very well"		
	Total	Estimate	Percent
35	2,314	46	2.0%
36	3,974	78	2.0%
38	1,552	70	4.5%
39	2,013	71	3.5%
40	4,593	133	2.9%
41	2,101	73	3.5%
42	4,315	23	0.5%
43	3,082	65	2.1%
44	4,061	131	3.2%
45	3,239	8	0.2%
46.01	3,431	158	4.6%
46.02	2,865	164	5.7%
47	6,390	191	3.0%
48	3,808	73	1.9%
49	5,369	171	3.2%
50	3,607	104	2.9%
101	5,880	119	2.0%
103.05	6,012	71	1.2%
104.01	6,569	267	4.1%
104.02	6,699	262	3.9%
105.01	7,902	205	2.6%
105.03	7,625	29	0.4%
105.04	3,195	87	2.7%
106.01	3,524	73	2.1%
106.02	7,601	183	2.4%
107	6,166	176	2.9%
108	1,957	35	1.8%
109	4,863	64	1.3%
110	3,428	53	1.5%
111.01	5,866	277	4.7%
111.02	3,995	184	4.6%
112.01	6,774	539	8.0%
112.02	3,963	74	1.9%
113	7,410	277	3.7%
114	5,680	71	1.3%
115	1,395	37	2.7%
116	1,556	26	1.7%
117.01	1,928	19	1.0%
117.02	5,657	238	4.2%
118	4,376	61	1.4%
119	3,921	219	5.6%
120	3,346	103	3.1%

Census Tract	Population 5 Years and Over		
	Speak English less than "very well"		
	Total	Estimate	Percent
121	2,495	45	1.8%
122	2,180	95	4.4%
123	5,124	371	7.2%
124.01	4,087	62	1.5%
124.02	5,994	31	0.5%
125	3,485	62	1.8%
126	3,920	79	2.0%
127.01	3,887	27	0.7%
127.02	2,386	77	3.2%
128.01	3,927	115	2.9%
128.02	3,176	18	0.6%
129.01	3,305	150	4.5%
129.02	6,784	285	4.2%
130	8,719	261	3.0%
131	10,310	313	3.0%
132.01	7,337	54	0.7%
132.02	9,558	194	2.0%
134.01	4,801	153	3.2%
135	8,393	126	1.5%
136	4,455	72	1.6%
137	3,000	143	4.8%
138	2,516	11	0.4%
139	5,475	22	0.4%
140.01	5,262	81	1.5%
140.02	5,720	217	3.8%
141	5,703	188	3.3%
142	3,400	8	0.2%
144	4,240	294	6.9%
145	1,967	29	1.5%
<b>Total</b>	<b>432,221</b>	<b>12,528</b>	<b>2.9%</b>

Source 2013-2017 ACS 5-Year Estimates

Map 4 PTBA LEP Population by Census Tract



Source 2013-2017 ACS 5-Year Estimates

Data was collected at the county level to identify languages spoken by LEP populations. ACS data provided by the U.S. Census Bureau only includes this level of data until the year 2015. For this reason, STA will use the 2015 data listed below in Table 10 to examine the languages spoken by the LEP populations within Spokane County.

**Table 10 Language Spoken at Home by Ability to Speak English**

<b>Spokane County, Washington</b>			
	<b>Total Estimate</b>	<b>Speak English "very well"</b>	<b>Speak English less than "very well"</b>
<b>Total</b>	<b>451,005</b>		
Speak only English	415,680		
Spanish or Spanish Creole	9,807	7,177	2,630
Russian	7,683	3,913	3,770
Vietnamese	2,005	710	1,295
Other Slavic languages	2,024	1,011	1,013
German	1,701	1,425	276
Other Pacific Island languages	1,208	459	749
Chinese	1,163	492	671
French (incl. Patois, Cajun)	1,006	820	186
Arabic	871	409	462
Tagalog	848	413	435
Korean	731	285	446
Italian	727	673	54
Other Indo-European languages	697	494	203
Japanese	618	438	180
Serbo-Croatian	598	373	225
African languages	593	188	405
Other Indic languages	369	111	258
Mon-Khmer, Cambodian	354	215	139
Hindi	243	228	15
Other West Germanic languages	238	230	8
Hmong	227	173	54
Other Native North American languages	218	199	19
Scandinavian languages	180	153	27
Urdu	172	149	23
Thai	147	73	74
Laotian	143	143	0
Other Asian languages	141	53	88
Persian	137	35	102
Hungarian	131	116	15
Polish	107	96	11
Portuguese or Portuguese Creole	96	50	46
Greek	49	49	0
Hebrew	49	39	10
French Creole	19	11	8
Other and Unspecified languages	16	16	0
Yiddish	9	9	0
Armenian	0	0	0
Gujarati	0	0	0
Navajo	0	0	0

**Input from Community Organizations**

- Based on survey responses, the most common languages encountered by community organizations are Russian, Spanish, and Marshallese, followed by Ukrainian, Arabic, Vietnamese, Burmese/Chin/Karen, Swahili, Farsi, Somali, Korean, Nepali, Chinese, French, Thai, Kinyarwanda, Kirundi, Moldovan, and Bosnian.
- According to Spokane International Translation, the most translated languages from 2017-2019 were Spanish, Russian and Arabic, followed by Vietnamese, Marshallese, Karen Burmese, Farsi, Dari, and Chinese Mandarin.

**Factor 2: The Frequency with Which LEP Individuals Come into Contact with a STA Program, Activity, or Service**

**Census Overview**

The 2017 ACS 5-year estimates include data on main mode of commute to work among LEP and non-LEP populations. This data show that for the service area, 3.2% (6,585 out of 205,640) of total workers over the age of 16 are LEP. LEP workers aged 16 and over who commute to work mainly by transit represent .1% (226 out of 205,640) of total commuters aged 16 and up. Of all the LEP commutes in the service area, only 3.43% (226 out of 6,585) use public transit for their commute. Table 11 below shows percentages of LEP riders for each commute type.

**Table 11 Means of Transportation to Work and Ability to Speak English**

	PTBA	LEP Estimate within PTBA
	Estimate	# Persons
Workers 16 years and over	205,640	6,585
Car, truck, or van – drove alone	161,430	4,303
Car, truck, or van – carpooled	19,218	1,428
Public transportation (excluding taxicab)	5,514	226
Walked	5,702	176
Taxicab, motorcycle, bicycle, or other means	3,489	158
Worked at home	10,287	294

Source: U.S. Census Bureau, 2017 American Community Survey 5-Year Estimates. Table B08113: Means of Transportation to Work by Language Spoken at Home and Ability to Speak English.

**Input from Community Organizations**

- When asking service providers how much their LEP clients relied on transit service, 45.8% (33 out of 72) stated their clients relied on transit service “A lot”. 31.9% (23 out of 72) of responders said their clients relied on transit service “A moderate amount”. 18.1% (13 out of 72) stated “A little”. 4.2% (3 out of 72) stated “None at all”.

**Additional Information**

There were numerous requests for translation received during the 2017-2019 assessment period. In 2017 there were 52 requests for translation services, in 2018 there were 62 requests, and in 2019 there were 103 requests. The majority of these requests came from the Mobility Center, which is located in the downtown STA Plaza. The Mobility Center manages the Paratransit eligibility process and provides mobility training to seniors and persons with disabilities to help them gain more independence and confidence in riding the fixed route system. The other requests included Paratransit Reservations, Customer Service, Security, and the Ombudsman.

Route 20/33 may serve over one hundred Japanese students in a day. It should be noted that one of the main reasons that the Japanese students attend Mukagawa Fort Wright Institute is to expand their English speaking abilities. In most communications with LEP persons on the bus, the passenger usually brings a map, either printed or on a smartphone, showing their destination.

STA security estimates that they require language assistance about 3 times per year when dealing with LEP populations.

### **Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by Spokane Transit Authority to the LEP Community**

#### **Description of Services**

As a regional public transportation agency, Spokane Transit Authority provides vital connections between residents and employers, educational institutions, medical centers, shopping malls, intermodal transportation centers such as the Spokane International Airport, and Fairchild Air Force Base. Serving downtown Spokane, Spokane Valley, and five other cities within the PTBA, Spokane Transit operates within an area encompassing approximately 248 square miles and 436,261 residents, or 84.7% of the county population (based on Washington State Office of Financial Management 2019 PTBA population estimates and April 2019 county population estimates).

In addition to fixed route services, STA provides ADA Paratransit and Vanpool services. Paratransit is door-to-door service provided within a defined service area, during fixed route operating hours, to eligible individuals whose disability prevents them from using fixed route bus service. Vanpool (Rideshare) service augments STA's public transportation system through the assignment of passenger vans to vanpool groups.

#### **Input from Community Organizations**

- When asking service providers how much their LEP clients relied on transit service, 45.8% (33 out of 72) stated their clients relied on transit service "A lot". 31.9% (23 out of 72) of responders said their clients relied on transit service "A moderate amount". 18.1% (13 out of 72) stated "A little". 4.2% (3 out of 72) stated "None at all".
- When asked if LEP clients ever express difficulty using transit service, 47 out of 69 or 68.1% of survey responders said "Yes". Meanwhile, 21 out of 69 or 30.4% said "No". There is no way to

determine if the difficulty is related to their ability to speak English or other difficulties related to accessing transit.

#### **Factor 4: The Resources Available to Spokane Transit Authority and Overall Costs**

This step allows STA to weigh the demand for language assistance against its current and projected financial and personnel resources. This analysis will help determine if the language services it currently provides are cost effective and should also help plan future investments that will provide the most needed assistance to the greatest number of LEP persons within the limits of STA resources.

##### **Resources Currently Available**

- Spokane Transit website is translatable with Google Translate.
- At least one Customer Service employee is fluent in Spanish.
- STA's Mobility Training program can use telephonic interpreters when teaching an LEP person to ride the bus.
- STA contracts with CTS LanguageLink to provide telephone interpretation. These services are used by the Mobility Center, Paratransit Reservations, Security, Customer Service, and the Ombudsman.
- STA contracts with Prisma International to provide written translation services upon request of an individual. These services are also used when the agency is doing targeted written outreach.
- The Ombudsman provides training to fixed-route and paratransit operators, security, and customer service representatives on how to assist LEP persons that require language assistance.
- Mobility trainers conduct outreach to organizations such as World Relief to assist staff and clients in learning how to use the fixed-route system.

##### **Costs**

- A number of local organizations serve LEP populations in a variety of ways including translation, ESL education, networking, job training, housing and other basic services.
- The cost for telephonic translations from CTS LanguageLink is \$0.6231 per minute
- For written translation through Prisma International, the pricing varies depending on the type of document it is and whether the language is considered a "principal language". The contract lists the primary languages. Other languages that are not principle will have a slightly higher charge.
- For the period January 1, 2017 through December 31, 2019 the total cost for translation service (both written and verbal) was \$4,628.85.

##### **Determination of LEP Assistance Needed**

Within the STA service area, LEP persons represent 2.9% of the total population. Of that LEP population, 3.4% commute mainly by transit. STA estimates that for the LEP population within the service area, 46% rely on transit service a lot, while 31.9% rely on transit a moderate amount. Based upon these findings,

STA has concluded that extensive outreach to LEP populations provides minimal results. There are few LEP people within the STA service area, and only a small portion of them use public transit.

### **Plan for Assisting Persons of Limited English Proficiency**

This plan we created in accordance with the determination of LEP assistance required with the STA service area based upon the findings of the Four-Factor Analysis. Below are strategies STA may use when assisting persons of limited-English ability.

#### **Targeted notifications to LEP organizations**

Depending on the scope of the project and the populations involved STA may do any of the following:

- Send updated information concerning fare changes or major service changes to community organizations (as identified in the distribution list) that have contact with LEP persons.
- Update the distribution list as needed.
- Send surveys to community organizations inquiring about the demographics of and the services provided to LEP persons.
- Work with community organizations to distribute STA information in needed languages.

#### **Language Assistance Measures**

The language assistance notice will be posted at the Plaza and the STA website, and on all fixed route coaches and paratransit vans. Notice of translation service will be provided in Spanish, Russian, and Vietnamese, the three identified “Safe Harbor” languages. An example of the language assistance notice is:

*If information is needed in another language, contact (509) 325-6094.*

*Si necesita información en otro idioma, comuníquese al (509) 325-6094.*

*Для получения информации на другом языке звоните по тел. (509) 325-6094.*

*Nếu quý vị cần thông tin bằng một ngôn ngữ khác, xin vui lòng gọi số (509) 325-6094.*

#### Language Translation Upon Request

The STA Ombudsman will make STA plans, forms, and other documents available in languages requested by an LEP individual. STA will work with a translator if language assistance is needed for oral communication.

Below is copy of the “Point to your language” poster that is used by customer service as a tool to assist people needing translation service (Figure 1).

After learning the language needed, customer service will contact CTS LanguageLink for translation services.



Figure 1 Point to your language poster

TRUSTED MULTILINGUAL COMMUNICATION

## Point to your language

Amharic አማርኛ	Hebrew עברית	Portuguese <b>Português</b>
Arabic العربية	Hindi हिन्दी	Punjabi ਪੰਜਾਬੀ
Bosnian (Serbo-Croatian) <b>Bosanski</b>	Hmong <b>Hmoob</b>	Romanian <b>Română</b>
Burmese မြန်မာစာ	Italian <b>italiano</b>	Russian <b>Русский</b>
Cambodian ខ្មែរ	Japanese 日本語	Somali <b>Soomaali</b>
Cantonese 廣東話	Karen ကညီ	Spanish <b>Español</b>
Haitian Creole <b>Kreyól Ayisyen</b>	Kirundi <b>Ikirundi</b>	Swahili <b>Kiswahili</b>
Farsi فارسی	Korean 한국어	Tagalog <b>Tagalog</b>
French <b>Français</b>	Laotian ພາສາລາວ	Thai ภาษาไทย
French-Canadian <b>français canadien</b>	Mandarin 國語	Tigrinya ትግርኛ
German <b>Deutsch</b>	Nepali नेपाली	Urdu اردو
Turkish <b>Türkçe</b>	Polish <b>Polski</b>	Vietnamese <b>Tiếng Việt</b>

Over 240 languages 24|7|365

[twitter.com/CTSlanguagelink](https://twitter.com/CTSlanguagelink)  
[facebook.com/ctslanguagelink](https://facebook.com/ctslanguagelink)  
 Find us online: [ctslanguagelink](https://ctslanguagelink.com)  
 Telephone: 1.800.208.2620

**CTS languagelink**  
*We speak your customer's language*

Website Translation

The STA website is equipped with Google Translate software in order to assist LEP populations when navigating online. This software includes translation services for each of the Safe Harbor Languages listed in this plan.

### **Staff Training**

The LEP Plan is available for all customer-facing employees in hard copy. This information will be part of the Spokane Transit staff orientation process for new customer-facing hires. Training topics include:

- STA's Title VI LEP policy and procedures;
- Language assistance offered by STA; and
- Procedures for accessing an interpreter.

Transit Operators are trained on STA's procedure for assisting LEP populations. This procedure includes the following:

- Be respectful.
- Use short simple sentences which are easier for the person speaking to you.
- Speak in single words which may help the customer.
- If you are talking through an interpreter, direct your conversation to the customer, not the interpreter.
- Don't pretend to understand if you have difficulty understanding a customer's speech, ask them to repeat the information, it may be important.
- Try visuals, have them write it down or point to a map. Be creative. Think charades.
- For language assistance refer to the Road Rules posting on the coach, behind the Driver's seat. Referring you to STA's Ombudsman at (509) 325-6094.
- If you need further assistance you may contact Dispatch, or if at the Plaza, direct them to Customer Service or Security for translation assistance.

### **Monitoring and Updating the LEP Plan**

This plan is designed to be flexible and is one that can be easily updated. At a minimum, Spokane Transit will follow the Title VI program update schedule for the LEP plan.

Each update should examine all plan components such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in the service area?
- Has there been a change in the types of languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified Spokane Transit programs? Are there other programs that should be included?
- Has Spokane Transit's available resources, such as technology, staff, and financial costs, changed?
- Has Spokane Transit fulfilled the goals of the LEP plan?
- Were there any complaints received?

### **Safe Harbor Provision**

According to the US Department of Justice’s (DOJ) Safe Harbor Provision, adopted by US Department of Transportation (DOT), if a recipient of federal funds will provide written translation of vital documents for each LEP language group that constitutes five percent (5%) or 1,000 persons of the total population served by the agency, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations. As of the 2015 ACS 5-year estimates, Russian, Spanish and Vietnamese qualify as “Safe Harbor” languages in Spokane County. STA will consider these as “Safe Harbor” languages in Spokane’s Public Transportation Benefit Area (PTBA).

**Dissemination of the Spokane Transit Limited English Proficiency Plan**

Spokane Transit will post the LEP plan on its website at [www.spokanetransit.com](http://www.spokanetransit.com).

An LEP person may obtain copies of the plan upon request. Any questions or comments regarding this plan should be directed to:

Community Ombudsman and Accessibility Officer  
1230 W. Boone Avenue  
Spokane, WA 99201  
(509) 325-6094  
TTY Relay 711  
[ombudsman@spokanetransit.com](mailto:ombudsman@spokanetransit.com)

## **SECTION 7 ENSURING SUBRECIPIENT COMPLIANCE**

## **Program Overview**

STA is the direct recipient of 5310 funds in the Spokane region. This program provides formula funding for the purpose of assisting private nonprofit groups in meeting the transportation needs of seniors and people with disabilities when the transportation service provided is unavailable, insufficient, or inappropriate to meeting these needs. The program aims to remove barriers to transportation service and expand transportation mobility options. Eligible subrecipients include private nonprofit organizations, states or local government authorities, or operators of public transportation. Subrecipients must submit Title VI Programs to STA in order to assist in compliance efforts. STA requests the Title VI Plans to be submitted electronically. Some of the subrecipients do not have Title VI plans and are given at least 90 days (from execution of agreement) to get a plan approved. If extra time is needed the subrecipient must request an extension from STA.

Spokane Transit staff provides assistance to subrecipients to encourage compliance. Subrecipients are provided with templates, checklists and other technical assistance to ensure they have the resources to write, adopt and implement a Title VI Plan. Subrecipients are given the choice to adopt Spokane Transit's notice to beneficiaries, complaint procedures and complaint form, public participation plan, and language assistance plan where appropriate. The subrecipient can modify when necessary. The subrecipient must also submit to STA a list of Title VI complaints, investigations, or lawsuits. Additional technical assistance is provided on an as-needed basis.

To ensure that all subrecipients comply with Title VI regulations, grants staff and program managers monitor the performance of subrecipients a minimum of every three years. The subrecipient monitoring process is summarized below.

## **Steps to Ensure Title VI Compliance of Subrecipient**

The procedures listed below have been revised to reflect procedures from FTA C 4702.1A and FTA C 4702.1B.

- Ensure that project agreements with subrecipients contain all required federal clauses.
- File copy of agreement/contract and Title VI plan with STA.
- On an annual basis, send a letter to subrecipient requesting a copy of A-133 audit report or other financial documentation, if the subrecipient received less than \$500,000 in federal funding from all sources.
- Review financial paperwork and communicate information to subrecipient.
- The Subrecipient will submit a signed Title VI Certification to STA that they will carry out the program in compliance with DOT's Title VI regulations. This is a requirement before STA can pass through any federal funds to the subrecipient.
- Subrecipients shall submit their Title VI Program to STA.
- Every Title VI program shall at a minimum include the following information:

1. A copy of the Title VI Notice to the public and where it is posted for public to view (local newspaper or website and posted at work location).
2. Instructions to the public regarding how to file a Title VI discrimination complaint.
3. Copy of the complaint form.
4. List of complaints, investigations, or lawsuits related to public transportation activities.
5. A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submission. A recipient’s targeted public participation plan for minority populations may be part of efforts that extend more broadly to include other constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.

**Note: In lieu of developing their own public participation plan, the subrecipient may adopt STA’s plan.**

6. A copy of the subrecipient’s plan for providing language assistance to persons with limited English proficiency, based on the DOT LEP Guidance.

**Note: In lieu of developing their own LEP Plan, the subrecipient may adopt STA’s plan.**

7. Information on transit-related, non-elected planning boards, advisory councils or committees with a table or narrative of racial breakdown of the membership and a description of efforts made to encourage participation of minorities.

Table 12 reflects subrecipients that currently have active projects using FTA Section 5310 funds.

**Table 12 List of STA Subrecipients**

<b>Apportionment Year</b>	<b>Subrecipient/Organization</b>	<b>Project</b>
2015-2016	Special Mobility Services	Mobility Management
2017-2018	Arc of Spokane	Transportation Specialist Position
	Catholic Charities	Volunteer Chore Services - Transportation
	Spokane Neighborhood Action Partners (SNAP)	Care Cars
	Spokane Regional Health District	Mobility Management
	Spokane Transit	Complimentary Paratransit Activities
2018-2019	Arc	ADA Vehicles Purchase
	SNAP	Care Cars
	SNAP	Dispatch Software Purchase
	Southside Community Center	ADA Vehicle Purchase
	Spokane Area Jewish Family Services	Demand Response Transportation
	Spokane Transit	Complimentary Paratransit Activities

## **SECTION 8 SYSTEMWIDE SERVICE POLICIES AND STANDARDS**

## Overview

Spokane Transit Authority’s System-wide Service Standards and the Service Policies were adopted by the STA Board in 2010 as part of the agency’s long-range plan, *Connect Spokane*. The plan was formed as part of an extensive public process. Amendments were made to the policies and standards in May 2019. A public hearing was held on April 18, 2019 and the board adopted the amendments on May 16, 2019.

## System-Wide Service Policies

Table 13 below presents the system-wide service policies, which are meant to ensure that transit amenities (i.e. bus stops, benches, and lighting) are distributed fairly throughout the system and that vehicles are properly assigned on a route by route basis.

**Table 13 System-Wide Service Policies**

Service Policy	STA Definition
System-Wide Transit Amenities	<p><b><i>Installation of transit amenities along bus routes are based on the number of passenger boardings at stops and stations along those routes and the High Performance Transit facility standards with variances from this policy to support connectivity of routes and riders with limited mobility.</i></b> (Connect Spokane - Annex 2 page 114)</p>
Signage at Bus Stops	<p><b><i>All STA bus stops shall feature signs mounted in a uniform manner to identify the area as a stop and provide readable and accurate information.</i></b> (SI-4.1 Connect Spokane, page 66)</p>
Benches at Bus Stop	<p><b><i>STA shall work with local authorities to ensure that benches are placed properly, designed adequately, and serve the needs of customers sufficiently.</i></b></p> <p>Benches provide comfort for all types of passengers. Although local jurisdictions are responsible for the operations and maintenance of bus benches, coordination with STA increases the likelihood that everyone’s needs are being met. Generally, STA recommends bench locations which meet one of the following criteria:</p> <ol style="list-style-type: none"> <li>1) 10 or more weekday average boardings</li> <li>2) Transfer point between two or more routes</li> <li>3) Adjacent to ridership generator with a high proportion of riders with limited mobility</li> </ol> <p>(SI-4.2 Connect Spokane, page 66)</p>



Service Policy	STA Definition
Shelters and Awnings	<p><b><i>The placement and maintenance of shelters or other weather cover for passenger waiting areas where appropriate shall be encouraged.</i></b></p> <p>STA shall work with local and regional jurisdictions to position bus shelters, awnings and other weather protection as funding allows and consistent with Title VI requirements. Shelters and awnings can encourage ridership by protecting waiting patrons from adverse weather elements. Shelters also provide an appropriate location for posting important ridership information. Stops with new shelters will comply with the Americans with Disabilities Act. Stops to have shelters funded by STA must meet at least one of the following criteria:</p> <ol style="list-style-type: none"> <li>1) 25 or more weekday average boardings</li> <li>2) Transfer point between two or more routes</li> <li>3) Adjacent to a ridership generator with a high proportion of riders with limited mobility.</li> </ol> <p>(SI-4.3.1 Connect Spokane, page 67)</p>
Lighting at Bus Stops	<p><b><i>Stops, benches, and shelters shall have pedestrian-scale lighting whenever possible.</i></b></p> <p>While any lighting enhances the safety and security of transit stops, benches, and shelters, lighting designed specifically to illuminate the path of a pedestrian can do a better job than general street lights.</p> <p>(SI-4.4 Connect Spokane, page 67)</p>
Bicycle Facilities	<p><b><i>Bicycles, including bicycle share, shall be accommodated at STA’s facilities and on STA coaches.</i></b></p> <p>(SI-4.4 Connect Spokane, page 67)</p>
Vehicle Assignment	<p><b><i>STA bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route such as passenger loads and overall ridership of each route. Local routes with lower ridership may be assigned a smaller fixed route vehicle. Some routes requiring tight turns on narrow streets may be operated with smaller fixed route vehicles. The age of the vehicle shall not be a consideration when assigning the vehicle to a particular maintenance garage for daily service.</i></b></p> <p>(Connect Spokane - Annex 2 page 114)</p>

## System-Wide Service Standards

Table 14 below presents the system-wide service standards, which are quantitative performance standards meant to ensure that fixed route services are fairly applied throughout STA's service area.

**Table 14 System-Wide Service Standards**

Service Standard	STA Definition																																				
On-time Performance	STA's on-time performance objective is 93% or greater.																																				
Vehicle Load	<table border="1"> <thead> <tr> <th data-bbox="396 590 558 722">Vehicle Type</th> <th data-bbox="558 590 802 722">Service Type</th> <th data-bbox="802 590 915 722">Seated</th> <th data-bbox="915 590 1029 722">Standing</th> <th data-bbox="1029 590 1159 722">Total</th> <th data-bbox="1159 590 1354 722">Maximum Load Factor Ratio</th> </tr> </thead> <tbody> <tr> <td data-bbox="396 722 558 764">30' Bus</td> <td data-bbox="558 722 802 764">Basic</td> <td data-bbox="802 722 915 764">26</td> <td data-bbox="915 722 1029 764">28</td> <td data-bbox="1029 722 1159 764">54</td> <td data-bbox="1159 722 1354 764">2.07</td> </tr> <tr> <td data-bbox="396 764 558 806">35' Bus</td> <td data-bbox="558 764 802 806">Basic</td> <td data-bbox="802 764 915 806">32</td> <td data-bbox="915 764 1029 806">40</td> <td data-bbox="1029 764 1159 806">72</td> <td data-bbox="1159 764 1354 806">2.25</td> </tr> <tr> <td data-bbox="396 806 558 869">40' Low Floor</td> <td data-bbox="558 806 802 869">Basic/Commuter</td> <td data-bbox="802 806 915 869">39</td> <td data-bbox="915 806 1029 869">41</td> <td data-bbox="1029 806 1159 869">80</td> <td data-bbox="1159 806 1354 869">2.05</td> </tr> <tr> <td data-bbox="396 869 558 953">40' Standard</td> <td data-bbox="558 869 802 953">Basic/Commuter</td> <td data-bbox="802 869 915 953">39</td> <td data-bbox="915 869 1029 953">41</td> <td data-bbox="1029 869 1159 953">80</td> <td data-bbox="1159 869 1354 953">2.05</td> </tr> <tr> <td data-bbox="396 953 558 1016">60' Low Floor</td> <td data-bbox="558 953 802 1016">Commuter</td> <td data-bbox="802 953 915 1016">62</td> <td data-bbox="915 953 1029 1016">61</td> <td data-bbox="1029 953 1159 1016">123</td> <td data-bbox="1159 953 1354 1016">1.98</td> </tr> </tbody> </table>	Vehicle Type	Service Type	Seated	Standing	Total	Maximum Load Factor Ratio	30' Bus	Basic	26	28	54	2.07	35' Bus	Basic	32	40	72	2.25	40' Low Floor	Basic/Commuter	39	41	80	2.05	40' Standard	Basic/Commuter	39	41	80	2.05	60' Low Floor	Commuter	62	61	123	1.98
Vehicle Type	Service Type	Seated	Standing	Total	Maximum Load Factor Ratio																																
30' Bus	Basic	26	28	54	2.07																																
35' Bus	Basic	32	40	72	2.25																																
40' Low Floor	Basic/Commuter	39	41	80	2.05																																
40' Standard	Basic/Commuter	39	41	80	2.05																																
60' Low Floor	Commuter	62	61	123	1.98																																
Service Availability	<p data-bbox="396 1100 1354 1163"><b><i>STA shall balance customer access, service reliability, and system performance when determining the spacing and placement of bus stops.</i></b></p> <table border="1"> <thead> <tr> <th data-bbox="396 1205 656 1310">Service</th> <th data-bbox="656 1205 834 1310">Average Stop Spacing</th> <th data-bbox="834 1205 997 1310">Minimum Stop Spacing</th> <th data-bbox="997 1205 1175 1310">Maximum Stop Spacing</th> </tr> </thead> <tbody> <tr> <td data-bbox="396 1310 656 1352">HPT - Frequent</td> <td data-bbox="656 1310 834 1352">¼ - ½ mile</td> <td data-bbox="834 1310 997 1352">800'-1300'</td> <td data-bbox="997 1310 1175 1352">1500'-3000'</td> </tr> <tr> <td data-bbox="396 1352 656 1394">HPT – Express</td> <td data-bbox="656 1352 834 1394">2.5 miles</td> <td data-bbox="834 1352 997 1394">1300'</td> <td data-bbox="997 1352 1175 1394">N/A</td> </tr> <tr> <td data-bbox="396 1394 656 1436">Basic Urban</td> <td data-bbox="656 1394 834 1436">¼ mile</td> <td data-bbox="834 1394 997 1436">800'</td> <td data-bbox="997 1394 1175 1436">1500'</td> </tr> <tr> <td data-bbox="396 1436 656 1478">Basic Interurban</td> <td data-bbox="656 1436 834 1478">½ mile</td> <td data-bbox="834 1436 997 1478">800'</td> <td data-bbox="997 1436 1175 1478">N/A</td> </tr> </tbody> </table> <p data-bbox="396 1499 818 1541">(FR-6.0 Connect Spokane, page 44)</p>	Service	Average Stop Spacing	Minimum Stop Spacing	Maximum Stop Spacing	HPT - Frequent	¼ - ½ mile	800'-1300'	1500'-3000'	HPT – Express	2.5 miles	1300'	N/A	Basic Urban	¼ mile	800'	1500'	Basic Interurban	½ mile	800'	N/A																
Service	Average Stop Spacing	Minimum Stop Spacing	Maximum Stop Spacing																																		
HPT - Frequent	¼ - ½ mile	800'-1300'	1500'-3000'																																		
HPT – Express	2.5 miles	1300'	N/A																																		
Basic Urban	¼ mile	800'	1500'																																		
Basic Interurban	½ mile	800'	N/A																																		

Service Standard	STA Definition																													
Vehicle Headway	<p><b><i>STA shall adhere to maximum headway standards when determining a route’s frequency.</i></b></p> <table border="1"> <thead> <tr> <th rowspan="2">Service</th> <th colspan="4">Maximum Headways (minutes)</th> </tr> <tr> <th>Span</th> <th>Peak</th> <th>Base</th> <th>Sub-Base</th> </tr> </thead> <tbody> <tr> <td>HPT - Frequent</td> <td>Extended</td> <td>7-10</td> <td>12-15</td> <td>15-30</td> </tr> <tr> <td>HPT – Express</td> <td>Extended</td> <td>15</td> <td>30</td> <td>60</td> </tr> <tr> <td>Basic Urban</td> <td>Basic</td> <td>30</td> <td>30</td> <td>60</td> </tr> <tr> <td>Basic Interurban</td> <td>Basic</td> <td>60</td> <td>60</td> <td>120</td> </tr> </tbody> </table> <p>(FR-4.0 Connect Spokane, page 43)</p>	Service	Maximum Headways (minutes)				Span	Peak	Base	Sub-Base	HPT - Frequent	Extended	7-10	12-15	15-30	HPT – Express	Extended	15	30	60	Basic Urban	Basic	30	30	60	Basic Interurban	Basic	60	60	120
Service	Maximum Headways (minutes)																													
	Span	Peak	Base	Sub-Base																										
HPT - Frequent	Extended	7-10	12-15	15-30																										
HPT – Express	Extended	15	30	60																										
Basic Urban	Basic	30	30	60																										
Basic Interurban	Basic	60	60	120																										

**System- Wide Title VI Policies**

The Title VI policies listed below are specific policies when implementing major service and all fare changes. They are also included in Spokane Transit’s comprehensive plan *Connect Spokane*, which was adopted in May 2019.

Table 15 Title VI Policies

Policy	STA Definition
System-Wide Title VI Policies	<p><b><i>STA will not “utilize criteria or methods of administration which have the effect of subjecting persons to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular race, color, or national origin.”</i></b></p> <p><b><i>STA will “take affirmative action to assure that no person is excluded from participation in, or denied the benefits of, the program or activity on the grounds of race, color, or national origin.” STA assures that “no person or group of persons shall be discriminated against with regard to routing, scheduling, or quality of service transportation on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color, or national origin.”</i></b></p>
Major Service Change Policies	<p><b><i>In developing annual plans and service changes, STA will assess whether changes meet the Major Service Change threshold. This threshold is as follows:</i></b></p> <ul style="list-style-type: none"> <li><b><i>Cost Impacts: More than 5.0% reduction in revenue hours of service in any calendar year</i></b></li> <li><b><i>Ridership Impacts: 5% or more of annualized system ridership negatively impacted by loss of bus stop(s), trip(s) or route(s) at any given service change. A Title VI analysis and evaluation of the impacts of major service changes will be published prior to a formal public hearing on the service change or a draft recommendation is published, whichever comes first.</i></b></li> </ul>

Policy	STA Definition
Service Change Disparate Impact Policy (minority)	<p><b><i>When a major service change impacts a census tract with a minority population that exceeds the average minority population of the service area by 10% or more, a disparate impact exists and the impacts will be assessed and evaluated for mitigation.</i></b></p> <p>The minority population in the PTBA is 15.4%. To determine if a disparate impact exists, each route impacted is analyzed to determine the percentage of minority population along that route. This is done by adding all the census tracts along that route. If the percentage is 16.9% or more, then a disparate impact exists.</p>
Service Change Disproportionate Burden Policy	<p><b><i>When a major service change impacts a census tract with a low-income population that exceeds the average low-income population of the service area by 10% or more, a disproportionate burden exists and the impacts will be assessed and evaluated for mitigation.</i></b></p> <p>The low-income population in the PTBA is 15.6%. To determine if a disparate impact exists, each route impacted is analyzed to determine the percentage of low-income population along that route. This is done by using all the census tracts along that route. If the percentage is 17.2% or more, then a disparate impact exists.</p>
System-wide Transit Amenities Service Policy	<p><b><i>Installation of transit amenities along bus routes are based on the number of passenger boardings at stops and stations along those routes and the High Performance Transit facility standards with variances from this policy to support connectivity of routes and riders with limited mobility.</i></b></p>
Vehicle Assignment Service Policy	<p><b><i>STA bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route such as passenger loads and overall ridership of each route. Local routes with lower ridership may be assigned a smaller fixed route vehicle. Some routes requiring tight turns on narrow streets may be operated with smaller fixed route vehicles. The age of the vehicle shall not be a consideration when assigning the vehicle to a particular maintenance garage for daily service.</i></b></p>
Fare Change Policy	<p><b><i>STA evaluates fare changes to ensure fare increases do not disproportionately negatively impact a class protected under Title VI.</i></b></p>
Fare Change Minority Disparate Impact Policy	<p><b><i>If a fare change affects fare categories or payment methods used disproportionately by minority populations (10% or greater) than the overall population, a fare change disparate impact exists and the impacts will be assessed and evaluated for mitigation.</i></b></p>
Fare Change Low-Income Disproportionate Impact Policy	<p><b><i>If a fare change affects fare categories or payment methods used disproportionately by low-income populations (10% or greater) than the overall population, a fare change disproportionate burden exists and the impacts will be assessed and evaluated for mitigation.</i></b></p>
On-Time Performance Standard	<p><b><i>STA's on-time performance objective is 93% or greater.</i></b></p>

**SECTION 9 EVALUATION OF 2017-2019 SERVICE AND FARE CHANGES**

## Summary of Major Service and Fare Changes Implemented since previous Title VI Update

One major fare change has become effective since the 2017 Title VI Program update. This fare change underwent a Title VI impact analysis process in accordance with the FTA C 4702.1B in 2016. As part of the analysis a public outreach effort was conducted. Based on the public comments, STA phased in the fare increase over a 2-year period. The analysis was included in the approved 2017 Title VI plan. Below is a copy of the current fare rates as of July 2018.

**Table 16 Fare Rate as of July 2018**

Fare Type	Fare Rate
	Effective July 2018
<u>Adult</u>	
One-Way/2-Hour Pass	\$2.00
Day Pass	\$4.00
31-Day Rolling Pass	\$60.00
Monthly Shuttle Park	\$40.00
7-Day Rolling Pass	\$17.00
<u>Reduced Fare</u>	
One-Way/2-Hour Pass	\$1.00
31-Day Rolling Pass	\$30.00
<u>Youth</u>	
One-Way/2-Hour Pass	\$2.00
Day Pass	\$4.00
31-Day Pass	\$40.00
Summer Pass	\$60.00
<u>Paratransit</u>	
One Ride	\$2.00
Monthly Pass	\$60.00

## Service Changes

With a few exceptions, STA periodically schedules both major and minor service changes to occur every January, May, and September (every four months).

Since January 2017, there have been only minor and moderate service reductions and route modifications. As none of these service changes met STA's adopted major service change threshold, it was not necessary to conduct a Title VI impact analysis. Below, is a summary of each of these service changes. Full descriptions of all changes are on file with the Planning Department.

Table 17 2017 Service Changes

<b>JANUARY 2017 SERVICE CHANGES</b>		
<b>ROUTE</b>	<b>ADJUSTMENT</b>	<b>RATIONALE</b>
<b>25 Division</b>	Add weekday inbound 6:53 pm Hastings P&R departure/ 7:30 pm Plaza arrival.	Improve PM mobility; better utilization of resources/equipment
<b>27 Hillyard</b>	Reinstate 2:45 pm outbound overload trip on weekdays (not on public schedule).	Trip helps the regularly scheduled bus stay on schedule despite lower ridership.
<b>45 Regal</b>	Modify timepoint location from 57 <sup>th</sup> /Regal to Regal/Palouse Hwy; timepoint adjustments	Improve timepoint spacing; 57 <sup>th</sup> /Perry route pattern unable to serve relocated 57 <sup>th</sup> /Regal shelter-stop location (relocated due to safety reasons).
<b>60 Airport via Browne's Addition</b>	Modify 9:45 pm Saturday Plaza arrival to alight in Zone 2 (no schedule reprint).	Reduce conflicts with other arriving buses.
<b>66 Cheney/EWU</b>	Modify public schedule timepoint headings due to long term EWU PUB closure and to match detour plan (alight 9 <sup>th</sup> /Elm & board Elm/C St). Public schedule inventory will be exhausted before re-ordering more.	Improve customer information
<b>68 Cheney Local</b>	Modify public schedule timepoint headings due to long term EWU PUB closure and to match detour plan (alight 9 <sup>th</sup> /Elm & board Elm/C St). Public schedule inventory will be exhausted before re-ordering more.	Improve customer information
<b>124 North Express</b>	Modify 6:12 pm outbound trip to depart the Plaza seven minutes earlier at 6:05 pm.	Allow for bus to arrive at Hastings P&R sooner in order to continue as new Route 25 inbound trip
<b>165 Cheney Express</b>	Modify public schedule timepoint headings due to long term EWU PUB closure and to match detour plan (alight 9 <sup>th</sup> /Elm & board Elm/C St).	Improve customer information.

JANUARY 2017 SERVICE CHANGES		
ROUTE	ADJUSTMENT	RATIONALE
<b>174 Liberty Lake Express</b>	Add two new inbound trips from Liberty Lake P&R at 6:42 pm and 7:12 pm.	Fill two-hour frequency gap; Comcast call center now open in Liberty Lake; buses currently deadhead back to the garage.
<b>Various</b>	Deadhead time adjustments & blocking	Improve efficiency.

MAY 2017 SERVICE CHANGES		
ROUTE(S)	ADJUSTMENT	RATIONALE
1 Plaza/Arena Shuttle	Modify outbound routing to use Washington St and Dean Ave (Broadway @ Monroe timepoint eliminated); Timepoint adjustments; Publish special "Construction Schedule"	Route on long-term detour due to City of Spokane construction project; Outbound routing could become permanent in September 2017 (pending Board approval)
2 South Side Medical Shuttle	Extend Saturday night service; Publish special "Construction Schedule"	Enhancement listed as an <i>STA Moving Forward</i> project; Routes 1 and 2 are published on same public schedule
20 SFCC	Extend Saturday night service and improve Saturday frequency to 30 minutes	Enhancements listed as <i>STA Moving Forward</i> projects (Route 33 is interlined with Route 20 at SFCC)
21 West Broadway	Extend Saturday night service and add early AM Saturday inbound trip (6:30 am Plaza arrival); Inbound weekday timepoint adjustments (6:00 am Plaza arrival modified to 5:57 am)	Enhancement listed as an <i>STA Moving Forward</i> project; Improve mobility
22 Northwest Blvd	Extend Saturday night service	Enhancement listed as an <i>STA Moving Forward</i> project
23 Maple/Ash	Extend Saturday night service	Enhancement listed as an <i>STA Moving Forward</i> project
24 Monroe	Extend Saturday night service	Enhancement listed as an <i>STA Moving Forward</i> project
25 Division	Extend Saturday night service	Enhancement listed as an <i>STA Moving Forward</i> project



<b>MAY 2017 SERVICE CHANGES</b>		
<b>ROUTE(S)</b>	<b>ADJUSTMENT</b>	<b>RATIONALE</b>
26 Lidgerwood	Extend Saturday night service	Enhancement listed as an <i>STA Moving Forward</i> project
27 Hillyard	Extend Saturday night service; Inbound timepoint adjustments all service days	Enhancement listed as an <i>STA Moving Forward</i> project; Improve reliability
28 Nevada	Extend Saturday night service	Enhancement listed as an <i>STA Moving Forward</i> project
29 S.C.C.	Extend Saturday night service; Outbound timepoint adjustments all service days; Add weeknight 11:20 pm outbound Plaza departure (interlined with Route 66)	Enhancement listed as an <i>STA Moving Forward</i> project; Improve reliability and mobility
32 Trent/Montgomery	Extend Saturday night service; Westbound timepoint adjustments all service days; Interline adjustments; Add early AM weekday Eastbound trip from S.C.C. at 5:10 am	Enhancement listed as an <i>STA Moving Forward</i> project; Improve reliability and mobility
33 Wellesley	Extend Saturday night service and improve Saturday frequency to 30 minutes	Enhancements listed as <i>STA Moving Forward</i> projects
34 Freya	Extend Saturday night service	Enhancement listed as an <i>STA Moving Forward</i> project
39 Mission	Extend Saturday night service; Add early AM Sunday/Holiday 8:00 am Plaza arrival and 8:05 am Plaza departure	Enhancement listed as an <i>STA Moving Forward</i> project; Improve mobility
42 South Adams	Extend Saturday night service	Enhancement listed as an <i>STA Moving Forward</i> project
43 Lincoln/37 <sup>th</sup> Ave	Extend Saturday night service; Inbound weekday timepoint adjustments (7:45 am Plaza arrival)	Enhancement listed as an <i>STA Moving Forward</i> project; Improve reliability
44 29 <sup>th</sup> Ave	Extend Saturday night service	Enhancement listed as an <i>STA Moving Forward</i> project
45 Regal	Extend Saturday night service	Enhancement listed as an <i>STA Moving Forward</i> project
60 Airport via Browne's Addition	Extend Saturday night service; Modify weekend routing to serve key locations in Airway Heights (Route extended from Spokane International Airport to serve Airway Heights via Flint Road).	Enhancements listed as <i>STA Moving Forward</i> projects; Keep the Route 60 and Route 61 buses offset through Browne's Addition
61 Hwy 2 via Browne's Addition	Extend Saturday night service; Extend last weeknight 11:20 pm outbound Plaza departure to Fairchild AFB front gate (trip switched from Route 60 that currently ends in Browne's Addition)	Enhancement listed as an <i>STA Moving Forward</i> project; Improve mobility and customer information

**MAY 2017 SERVICE CHANGES**

<b>ROUTE(S)</b>	<b>ADJUSTMENT</b>	<b>RATIONALE</b>
66 Cheney/EWU	Extend Saturday night service; Add early AM Saturday 6:35 am Plaza departure; Inbound weekday timepoint adjustments (5:45 am Plaza arrival); Add weeknight 11:20 pm outbound Plaza departure (interlined with Route 29)	Enhancement listed as an <i>STA Moving Forward</i> project; Improve reliability and mobility
68 Cheney Local	Extend Saturday night service; Add early AM Saturday 7:10 am EWU departure; Inbound weekday timepoint adjustments (5:15 am EWU arrival)	Enhancement listed as an <i>STA Moving Forward</i> project; Improve reliability and mobility
90 Sprague	Extend Saturday night service; Early AM outbound timepoint adjustments all service days; Interline adjustments	Enhancement listed as an <i>STA Moving Forward</i> project; Improve reliability and mobility
94 East Central/Millwood	Extend Saturday night service	Enhancement listed as an <i>STA Moving Forward</i> project
95 Mid-Valley (NEW)	Introduce new service on Indiana Ave east of Sullivan Road in Spokane Valley with route terminals at Mirabeau Point Park & Ride and the VTC via Indiana Ave, Flora Rd, Broadway Ave, and University Rd seven days a week.	Enhancement listed as an <i>STA Moving Forward</i> project
96 Pines/Sullivan	Extend Saturday night service; Modify route to eliminate out of direction travel to Mirabeau Point Park & Ride (transfer environment significantly improved at the Indiana Ave and Evergreen Rd intersection); Interline adjustments; Outbound/Inbound timepoint adjustments all service days	Enhancement listed as an <i>STA Moving Forward</i> project; Improve route productivity and customer information
97 South Valley	Extend Saturday night service; Outbound timepoint adjustments all service days; Interline adjustments	Enhancement listed as an <i>STA Moving Forward</i> project; Improve reliability; Improve mobility
98 Liberty Lake via Sprague	Extend Saturday night service; Outbound/Inbound timepoint adjustments; Interline adjustments	Enhancement listed as an <i>STA Moving Forward</i> project; Improve reliability; Improve mobility
124 North Express	Modify outbound trips to depart the Plaza one minute earlier	Improve speed and reliability (Route is often delayed behind Route 24 bus in front and to anticipate delays associated with City of Spokane Monroe Project)

**SEPTEMBER 2017 SERVICE CHANGES**

ROUTE	ADJUSTMENT	RATIONALE
1 Plaza/Arena Shuttle	Permanently modify outbound routing to use Washington St and Dean Ave (Broadway @ Monroe timepoint eliminated)	Outbound routing adjustment listed in the Board approved September 2017 Final Recommendation; Provide a faster return trip from Downtown Spokane to the Arena Lot by eliminating one-way loop routing.
20 SFCC	Weekday timepoint adjustments (Extra weekday bus in service starting in early afternoon on clockwise City Loop)	Improve reliability
24 Monroe	Improve Saturday night and Sunday/Holiday frequency to 30 minutes	Frequency improvement listed as an 2019 <i>STA Moving Forward</i> project; Routes 26/28 extended to end-of-lines (interline partners)
25 Division	Modify timepoint location from Hwy 2/Hawthorne to Division/Magnesium outbound & Division/Price inbound	Improve reliability and timepoint spacing; Route 26 modified to eliminate service on Magnesium Rd
26 Lidgerwood	Modify route to end at North Dakota St at Jay Ave between Walmart and Winco Foods thereby discontinuing service on Magnesium Road between Division and Nevada Streets; Discontinue weekend Nevada/Lidgerwood loop; Extend route to end-of-line Saturday nights and all-day Sunday/Holidays; Weekday timepoint adjustments	Routing adjustment listed in the Board approved September 2017 Final Recommendation in order to improve reliability and productivity.
28 Nevada	Extend route to end-of-line Saturday nights and all day Sunday/Holidays; Discontinue weekend Nevada/Lidgerwood loop; Weekday timepoint adjustments	Enhancements listed as <i>STA Moving Forward</i> projects; Improve reliability
29 S.C.C.	Weekday timepoint adjustments	Improve reliability
32 Trent/Montgomery	Weekday timepoint adjustments; Interline adjustments (extra bus in service on Valley routes weekdays)	Improve reliability
33 Wellesley	Weekday timepoint adjustments (Extra weekday bus in service starting in early afternoon on clockwise City Loop)	Improve reliability
34 Freya	Weekday timepoint adjustments (Extra weekday bus in service starting in early afternoon on clockwise City Loop)	Improve reliability
39 Mission	Weekday timepoint adjustments	Improve reliability

SEPTEMBER 2017 SERVICE CHANGES		
ROUTE	ADJUSTMENT	RATIONALE
44 29 <sup>th</sup> Ave	Weekday timepoint adjustments (Extra weekday bus in service starting in early afternoon on clockwise City Loop)	Improve reliability
74 Mirabeau/Liberty Lake	Re-number and re-name Route 174 Liberty Lake Express: <i>Route 74 Mirabeau/Liberty Lake</i> ; Add late-morning and mid-afternoon trips on weekdays in order to provide consistent frequency during off-peak hours (30 minute mid-day frequency).	Mid-day frequency enhancement listed as <i>STA Moving Forward</i> project.
90 Sprague	Improve weekday outbound departure reliability by adding downtown layover at the Plaza (Extra weekday bus in service starting in late morning); Timepoint adjustments	Improving downtown departure reliability is an enhancement listed as an <i>STA Moving Forward</i> project.
95 Mid-Valley	Timepoint adjustments; Interline adjustments (extra bus in service on Valley routes weekdays)	Improve reliability and connections
96 Pines/Sullivan	Weekday timepoint adjustments; Interline adjustments (extra bus in service on Valley routes weekdays)	Improve reliability and connections
97 South Valley	Weekday timepoint adjustments; Interline adjustments (extra bus in service on Valley routes weekdays)	Improve reliability and connections
98 Liberty Lake via Sprague	Timepoint adjustments; Interline adjustments (extra bus in service on Valley routes weekdays)	Improve reliability and connections
172 Liberty Lake Express (NEW)	Partially reinstate direct, non-stop service between Liberty Lake Park & Ride and Downtown Spokane during peak hours (Phase 1 between Liberty Lake P&R and Downtown Spokane).	Incrementally phase in an enhancement listed as an <i>STA Moving Forward</i> project not scheduled for full implementation until 2023.

Table 18 2018 Service Changes

JANUARY 2018 SERVICE CHANGES		
ROUTE	ADJUSTMENT	RATIONALE
1 Plaza/Arena Shuttle	Eliminate Howard/Gardner timepoint from the public schedule (stop/shelter at location will remain) due to close proximity to Arena lot timepoint	Improve reliability
20 SFCC	Modify 6:27 am weekday outbound trip to depart the Plaza two minutes earlier at 6:25 am	Improve reliability and provide more coach operator recovery time on Sunday/Holidays

<b>JANUARY 2018 SERVICE CHANGES</b>		
<b>ROUTE</b>	<b>ADJUSTMENT</b>	<b>RATIONALE</b>
33 Wellesley	Modify 6:37 am weekday eastbound trip to depart SFCC two minutes earlier at 6:35 am (interlined with modified Route 20 trip)	Accommodate current ridership demands
34 Freya	Weekday southbound timepoint adjustments	Improve schedule reliability and assist with overcrowding in buses at Eagle Point
44 29 <sup>th</sup> Ave	Add early AM weekday outbound Plaza departure at 6:05 am; Weekday inbound trip adjustment due to interlined Route 34 Sprague/Havana trip adjustment	Improve connection reliability with select inbound Route 174 trips at Mirabeau Park & Ride.
60 Airport via Browne's Addition	Modify route to serve new Spokane Tribe Casino stop (STEP project) on weekends (no extra buses in service = no change to existing cycle time)	Improve mobility and avoid unnecessary delay due to gap in service during this hour on Route 68
61 Highway 2 via Browne's Addition	Modify route to serve new Spokane Tribe Casino stop (STEP project) with one extra bus in operation on weekdays (90 minute cycle time increased to 120 minute cycle time = short term solution until new West Plains route begins service in 2020); Weekday trips that travel onto FAFB will layover at the BX	Improve reliability and avoid unnecessary delay
66 Cheney/EWU	Update outbound pattern on public schedule map and in Trapeze to reflect current long-term detour pattern at EWU	Improve customer information; Outbound buses currently use 8 <sup>th</sup> St between Elm and Cedar Streets in order to travel to the temporary layover spot at Cedar St & 9 <sup>th</sup> St (original plan was to use Erie St between Elm and Cedar Streets)
68 Cheney Local	Update outbound pattern on public schedule map and in Trapeze to reflect current long-term detour pattern at EWU; Modify clockwise routing to travel on 7 <sup>th</sup> St between C and Elm Streets	Improve customer information; Outbound buses currently use 8 <sup>th</sup> St between Elm and Cedar Streets in order to travel to the temporary layover spot at Cedar St & 9 <sup>th</sup> St (original plan was to use Erie St between Elm and Cedar Streets); Match outbound Route 165 routing on 7 <sup>th</sup> St
74 Mirabeau/Liberty Lake	Weekday PM outbound timepoint adjustments; Add early AM inbound trip from Mirabeau Park & Ride at 6:35 am	Improve reliability and mobility (trip at this time was converted to a Route 172 inbound trip that does not serve the park & ride in September 2017 which created a 30 minute gap in service)

<b>JANUARY 2018 SERVICE CHANGES</b>		
<b>ROUTE</b>	<b>ADJUSTMENT</b>	<b>RATIONALE</b>
165 Cheney Express	Update outbound pattern on public schedule map and in Trapeze to reflect current long-term detour pattern at EWU	Improve customer information; Outbound buses currently use 8 <sup>th</sup> St between Elm and Cedar Streets in order to travel to the temporary layover spot at Cedar St & 9 <sup>th</sup> St (original plan was to use Erie St between Elm and Cedar Streets)
172 Liberty Lake Express	Adjust 5:05 pm outbound trip to arrive at Liberty Lake Park & Ride six minutes later	Improve reliability

<b>MAY 2018 SERVICE CHANGE</b>		
<b>ROUTE</b>	<b>ADJUSTMENT</b>	<b>RATIONALE</b>
<b>20 SFCC</b> (1805-05-01)	New weeknight inbound trip from SFCC at 11:00 PM (11:15 PM Plaza arrival) that continues from a new westbound Route 33 trip	Improve mobility; Match Saturday span of service
<b>22 Northwest Blvd</b>	Outbound VA Hospital routing change to travel on Independence Dr and Wellesley Ave in order to continue regular routing on Assembly St (eliminate left turn out of VA Hospital); Outbound timepoint adjustments	Improve reliability; Eliminate problematic left turn
<b>25 Division</b>	Outbound timepoint adjustments all service days	Improve reliability
<b>32 Trent/Montgomery</b>	Modify 5:19 PM and 5:49 PM weekday westbound trips to depart at 5:12 PM and 5:42 PM in order to arrive at SCC seven minutes earlier at 5:41 PM and 6:11 PM; Timepoint adjustments	Improve connections to westbound Route 33 trips at SCC
<b>33 Wellesley</b>	New weeknight westbound trip from SCC at 10:30 PM that continues as a new Route 20 trip at SFCC	Improve mobility; Match Saturday span of service
<b>34 Freya</b>	Begin extra weekday Route 34 (City Loop clockwise) bus two hours earlier at 10:47 AM at the Sprague/Havana timepoint; Timepoint adjustments	Improve reliability and mobility (connections at Sprague/Havana)
<b>39 Mission</b>	Modify first 5:59 AM weekday outbound trip to begin service at 5:55 AM in order to arrive at SCC four minutes earlier at 6:08 AM	Improve connection to eastbound Route 32 6:10 AM trip at SCC
<b>44 29th Ave</b>	Inbound weekday timepoint adjustments at South Hill Park & Ride (related to Route 34 change)	Improve reliability

<b>MAY 2018 SERVICE CHANGE</b>		
<b>ROUTE</b>	<b>ADJUSTMENT</b>	<b>RATIONALE</b>
<b>61 Highway 2 via Browne's Addition</b>	New Saturday night inbound trip from the Fairchild Air Force Base (FAFB) gate (11:00 PM Plaza arrival)	Improve mobility; bus currently deadheads back from FAFB (deadhead time converted to revenue time)
<b>74 Mirabeau/Liberty Lake</b>	Weekday AM inbound timepoint adjustments; Adjust 3:28 PM inbound trip to depart Liberty Lake Park & Ride four minutes later at 3:32 PM	Improve reliability
<b>90 Sprague</b>	Modify last two weeknight inbound trips (10:00 PM and 10:30 PM) to depart the VTC two minutes later at 10:02 PM and 10:32 PM	Improve connections from last weeknight inbound Route 96 trip at VTC; Improve reliability
<b>95 Mid-Valley</b>	Extend last outbound trip all service days to end service at Indiana/Desmet (trips currently end at Broadway/Sullivan); Weekday afternoon interline adjustments on two inbound trips	Improve mobility; Interline adjustments related to Route 32 change
<b>96 Pines/Sullivan</b>	Modify first three weekday inbound trips to arrive at the VTC two minutes earlier; Modify 2:13 PM weekday outbound trip to depart the VTC four minutes earlier at 2:09 PM; Weeknight outbound and inbound timepoint adjustments to allow the last inbound trip to arrive at the VTC eight minutes earlier at 10:00 PM	Improve connections at VTC; Improve reliability; Allow last weeknight inbound trip to connect to 10:02 PM inbound Route 90 trip at the VTC
<b>97 South Valley</b>	New weekday early AM outbound trip from the VTC at 5:25 AM (continues as Route 32 at Mirabeau Park & Ride); Weekday outbound timepoint adjustments on two trips (4:17 PM and 5:17 PM trips to depart seven minutes earlier); Weekday afternoon interline adjustments on two inbound trips	Improve mobility (Eliminate guarantee time in run pay); Timepoint and interline adjustments related to Route 32 change (Route 97 continues as Route 32 at Mirabeau Park & Ride)
<b>98 Liberty Lake via Sprague</b>	Begin first weekday outbound trip at the VTC at 5:51 AM (trip currently begins service at Sprague/Pines); Weekday outbound timepoint adjustments on two trips (4:43 PM and 5:13 PM trips to depart two minutes later)	Improve mobility; Timepoint and interline adjustments related to Route 32 change
<b>172 Liberty Lake Express</b>	Weekday AM inbound timepoint adjustments	Improve reliability

SEPTEMBER 2018 SERVICE CHANGES		
ROUTE	ADJUSTMENT	RATIONALE
<b>11 Plaza/Arena Shuttle</b>	Change route number from "1" to "11"	Vacate the number "1" for future use by another route, tentatively the Central City Line.
<b>12 Southside Medical Shuttle</b>	Extend the route to the University District Gateway Bridge; Timepoint adjustments; Change route number from "2" to "12"	Connect the University District to South Hill medical facilities; Improve the connection between the Route 90 Sprague and South Hill medical facilities; Vacate the number "2" for future use by another route, tentatively Division HPT.
<b>20 SFCC</b>	Inbound Plaza arrival zone changes; Interline adjustments	Adjustments to the Plaza zone assignments are required to combine of zones 4 and 5 to accommodate 60' vehicles.
<b>21 West Broadway</b>	Interline with the Route 90 and increase frequency from 30 to 15 minutes weekdays; Interline and timepoint adjustments; Inbound Plaza arrival zone changes	Interlining the Route 90 with the shorter Route 21 allows its layover to be shifted from the Plaza to the West Central Community Center; Increased weekday frequency on the Route 21 is an <i>STA Moving Forward Improvement</i> scheduled for 2021 that was accelerated to facilitate the interline.
<b>22 Northwest Blvd</b>	Interline and timepoint adjustments; Inbound Plaza arrival zone changes	Adjustments to the Plaza zone assignments are required to allow for the combination of zones 4 and 5 to accommodate 60' vehicles; Outbound timepoint and interline adjustments provide for offset with the Route 23, which will now be serving Boone between Monroe and Maple/Ash Streets.
<b>23 Maple/Ash</b>	Serve Indian Trail on all trips; Eliminate the Francis/Belt loop pattern; Operate on Boone between Monroe and Maple/Ash Streets; Interline and timepoint adjustments; Inbound Plaza arrival zone changes	Indian Trail night and weekend service is an <i>STA Moving Forward</i> improvement; The route is being shifted to Boone Ave because of the increased frequency of the Route 21 Broadway; Interline and Plaza zone changes enable an offset with the Route 22, which currently serves Boone between Monroe and Maple/Ash Streets.
<b>24 Monroe</b>	Inbound Plaza arrival zone changes	Adjustments to the Plaza zone assignments are required for the combination of zones 4 and 5 to accommodate 60' vehicles



**SEPTEMBER 2018 SERVICE CHANGES**

ROUTE	ADJUSTMENT	RATIONALE
<b>25 Division</b>	Change inbound Plaza arrival zone to Zone 6; Layover weekdays at 2 <sup>nd</sup> Ave and Lincoln St to allow outbound trips to depart on time; Timepoint adjustments	Zone 6 Plaza arrival discontinues the current practice of circling around the block with passengers on-board and can accommodate a 60' vehicle; Saturday timepoint adjustments avoid Plaza zone conflicts with the Route 90; Improve reliability.
<b>26 Lidgerwood</b>	Begin extra weekday afternoon bus two hours later within the Route 24-26-28 interline; Timepoint adjustments; Change outbound Plaza zone to Zone 3	Delaying the extra afternoon bus saves resources through interlining with an existing trip that would normally be out of service; Improve reliability; Adjustments to the Plaza zone assignments are required for the combination of zones 4 and 5 to accommodate 60' vehicles.
<b>27 Hillyard</b>	Change outbound Plaza zone to Zone 2; Interline and timepoint adjustments; Inbound Plaza arrival zone changes	Plaza zone assignments are required for the combination of zones 4 and 5 to accommodate 60' vehicles; Interline changes allow an offset between the routes 22 and 23; Improve reliability.
<b>28 Nevada</b>	Begin extra weekday afternoon bus two hours later within the Route 24-26-28 interline; Timepoint adjustments; Change outbound Plaza departure zone to Zone 3	Delaying the extra afternoon bus saves resources through interlining with an existing trip that would normally be out of service; Improve reliability; Adjustments to the Plaza zone assignments are required for the combination of zones 4 and 5 to accommodate 60' vehicles.
<b>29 SCC</b>	Change outbound Plaza departure zone to Zone 3; Interline with the Route 64 weeknights; Inbound Plaza arrival zone changes	Adjustments to the Plaza zone assignments are required for the combination of zones 4 and 5 to accommodate 60' vehicles; the weeknight interline with the Route 64 facilitates access between the EWU Cheney campus and evening classes at EWU Spokane.
<b>34 Freya</b>	Interline and timepoint adjustments; Shift layover from the South Hill Park & Ride to SCC (also impacts Route 33 hours)	Interline adjustments related to other route zone modifications and schedule changes; Improve mobility
<b>39 Mission</b>	Change outbound Plaza zone to Zone 3	Adjustments to the Plaza zone assignments are required for the combination of zones 4 and 5 to accommodate 60' vehicles

<b>SEPTEMBER 2018 SERVICE CHANGES</b>		
<b>ROUTE</b>	<b>ADJUSTMENT</b>	<b>RATIONALE</b>
<b>42 South Adams</b>	Interline and timepoint adjustments	Adjustments related to other route zone modifications and schedule changes
<b>43 Lincoln/37th</b>	Interline and timepoint adjustments	Adjustments related to other route zone modifications and schedule changes
<b>44 29th Ave</b>	Change outbound Plaza departure zone to Zone 2; Interline and timepoint adjustments; Shift layover from the South Hill Park & Ride to SCC (also impacts Route 34 hours)	Adjustments to the Plaza zone assignments are required for the combination of zones 4 and 5 to accommodate 60' vehicles; Interline adjustments related to other route zone modifications and schedule changes; Improve mobility
<b>45 Regal</b>	Change outbound Plaza departure zone to Zone 1; Inbound Plaza arrival zone changes; Interline adjustments	Adjustments to the Plaza zone assignments are required for the combination of zones 4 and 5 to accommodate 60' vehicles; Interline adjustments related to other route zone modifications and schedule changes
<b>60 Airport via Browne's Addition</b>	Change to 90 minute cycle nights and weekends with routing modified to end at the Spokane Tribe Casino instead of the Fairchild Air Force Base (FAFB) Gate; Extend route to Airway Heights weeknights; Interline and timepoint adjustments; Inbound Plaza arrival zone changes	Maintain offset with Route 61 through Browne's Addition; Interline and timepoint adjustments related to other route, zone modifications, and schedule changes
<b>61 Highway 2 via Browne's Addition</b>	Discontinue night and weekend service to Medical Lake; Change to 90 minute cycle mid-day on weekdays, weeknights, and weekends; Eliminate some mid-day trips that travel onto FAFB; Extend two weekday outbound trips to the FAFB Fitness Center; Interline and timepoint adjustments	Medical Lake will be served by the Route 62 on nights and weekends; Maintain offset with Route 60 through Browne's Addition and improve efficiency; Extending two trips to the FAFB Fitness Center will preserve paratransit service to the FAFB hospital since the route will no longer serve Medical Lake nights and weekends
<b>62 Medical Lake</b>	Modify route to terminate at the West Plains Transit Center; Increase frequency to hourly; Operate on nights and weekends	The completion of the West Plains Transit Center facilitates the connection between Medical Lake and the new Route 64. This allows the existing route to be shortened in order to efficiently provide more service hours, improve frequency, and allow Medical Lake service to be discontinued on Route 61

**SEPTEMBER 2018 SERVICE CHANGES**

ROUTE	ADJUSTMENT	RATIONALE
<b>New 64 West Plains/Cheney</b>	The new route will provide hourly frequency between Downtown Spokane, the West Plains Transit Center, and Cheney 7-days a week; Weekdays during peak periods the frequency will be 30 minutes in the AM inbound and PM outbound directions	Service the new West Plains Transit Center; Facilitate connections between Downtown Spokane, Medical Lake, and Cheney; Replace the Route 165 which is being discontinued; Serve as the primary route serving Cheney (no service on Route 66 weeknights and weekends)
<b>66 EWU</b>	Add timepoint at 6 <sup>th</sup> and McKeehan/Simpson; New end-of-line at EWU Surbeck layover; Interline and timepoint adjustments; Implement new simplified non-school schedule; Discontinue night and weekend service	New Cheney timepoint facilitates transfers between the revised Route 68; New end-of-line relocates the layover location from the EWU PUB to Surbeck due to the PUB remodel project; New Route 64 will become the primary route serving Cheney nights and weekends
<b>68 Cheney Local</b>	Modify route to serve Simpson/McKeehan & Presley/Salnavé; Simplify schedule with same pattern 7-days a week; Layover at K-St Station; Change pattern direction descriptions to “Left” and “Right”	Revised route will avoid railroad crossings and minimize turns improving reliability; the Route 165 will be discontinued so the Route 68 will serve the Presley/Salnavé area 7-days a week (currently only served during weekday peak); The streamlined pattern and revised names make the route less confusing
<b>74 Mirabeau/Liberty Lake</b>	Interline adjustments; Inbound Plaza arrival zone changes	Adjustments related to other route zone modifications and schedule changes
<b>90 Sprague</b>	Interline with Route 21 weekdays; Change outbound Plaza departure zone to expanded Zone 4; Inbound Plaza arrival zone changes; New timepoint at Sprague and Sherman	Interlining with Route 21 allows downtown Plaza layover to be shifted to the West Central Community Center; Plaza zone assignment changes are required to combine zones 4 and 5 to accommodate 60’ vehicles; Improve reliability; New timepoint at Sprague and Sherman facilitates connections with the extended Route 12 South Side Medical Shuttle

**SEPTEMBER 2018 SERVICE CHANGES**

ROUTE	ADJUSTMENT	RATIONALE
<b>94 East Central/Millwood</b>	Revise inbound pattern to use 4 <sup>th</sup> Ave and Liberty Park Pl instead of E 3 <sup>rd</sup> Ave and E 2 <sup>nd</sup> Ave; Change outbound Plaza departure zone to Zone 2 on weekdays and Zone 1 on weekends; Inbound Plaza arrival zone changes; Interline and timepoint adjustments; Revise inbound pattern on weekdays (2nd Ave to Lincoln St to Riverside Ave when interlined with Route 45 at the Plaza)	Inbound East Central neighborhood pattern revision will eliminate out of direction travel; Plaza zone assignment changes are required to combine zones 4 and 5 to accommodate 60' vehicles; Interline and arrival zone adjustments related to other route zone modifications and schedule changes
<b>95 Mid-Valley</b>	Timepoint adjustments	Facilitate transfers with other revised routes
<b>96 Pines/Sullivan</b>	Timepoint adjustments	Facilitate transfers with other revised routes and improve reliability
<b>98 Liberty Lake via Sprague</b>	Timepoint adjustments	Facilitate transfers with other revised routes
<b>124 North Express</b>	Revise two morning trips to begin service at Fairwood Park & Ride instead of Hastings Park & Ride	Avoid challenging left turn during the Mead High School peak morning traffic
<b>165 Cheney Express</b>	Discontinue route	Customers served by the new Route 64, revised Route 68, and Route 66
<b>172 Liberty Lake Express</b>	Change the Plaza arrival zone of one trip to Zone 6 in order to interline with Route 66 when school is in session; Interline adjustments	Improve mobility
<b>173 VTC Express</b>	Discontinue 8:12 AM outbound Plaza round-trip; Convert some mid-day outbound trips to the new Route 190	Offset some costs associated with operating the new Route 190; Improve mobility
<b>New 190 Valley Express</b>	The new route will provide express service between the VTC and Downtown Spokane via Sprague Ave/Appleway Blvd	Provide VTC commuters with an option for a more direct route to and from Downtown Spokane.
<b>662 EWU North Express</b>	Rename the Route 66 express trips that originate from the Hastings Park & Ride "662"	Unique numbers for these express routes will allow for more descriptive route performance reporting and better characterize the nature of the route
<b>663 EWU VTC Express</b>	Rename the Route 66 express trips that originate from the Valley Transit Center "663"	Unique numbers for these express routes will allow for more descriptive route performance reporting and better characterize the nature of the route
<b>664 EWU South Hill Express</b>	Rename the Route 66 express trips that originate from the Valley Transit Center "664"	Unique numbers for these express routes will allow for more descriptive route performance reporting and better characterize the nature of the route

Table 19 – 2019 Service Changes

<b>JANUARY 2019 SERVICE CHANGES</b>		
<b>ROUTE</b>	<b>ADJUSTMENT</b>	<b>RATIONALE</b>
<b>12 Southside Medical Shuttle</b>	Change end-of-line routing to reflect the current detour routing. Route will now end at 1st Avenue & Sherman until access is obtained in order to serve the new U District Pedestrian Bridge.	Improve customer information; Delays in the construction of U-District Pedestrian Bridge layover area are preventing bus access (now estimated to be completed in late 2019 when Avista paves Sheridan Street)
<b>23 Maple/Ash</b>	Inbound timepoint adjustments	Improve reliability
<b>28 Nevada</b>	Outbound timepoint adjustments	Improve reliability
<b>45 Regal</b>	Modify one weekday inbound trip to provide more run time due to Ferris High School traffic on Regal Street	Improve reliability
<b>62 Medical Lake</b>	Outbound and inbound timepoint adjustments	Improve reliability and connection wait times with Route 64 at the West Plains Transit Center
<b>64 West Plains/Cheney</b>	Outbound and inbound timepoint adjustments; Convert the current Route 66 6:15 am weekday Plaza arrival trip to a Route 64 trip in order to begin revenue service at K Street Station	Improve reliability, early AM mobility, and connections with Route 62 at the West Plains Transit Center
<b>66 EWU</b>	New AM outbound trip at 9:12 am; Convert the current 6:15 am weekday Plaza arrival trip to a Route 64 trip in order to begin revenue service at K Street Station	Reduce overcrowding on the 9:05 am and 9:20 am outbound trips; Improve early AM mobility
<b>68 Cheney Local</b>	Left and right timepoint adjustments as well as new trips/trip modifications to better align with afternoon class schedules; New early AM weekday left trip from Washington & Elm connecting to the modified Route 64 trip at K Street Station	Improve reliability and mobility
<b>74 Mirabeau/Liberty Lake</b>	Inbound AM timepoint adjustments on three trips	Improve reliability
<b>90 Sprague</b>	Outbound and inbound timepoint adjustments for the Sprague & Sherman timepoint in both directions	Improve reliability
<b>173 VTC Express</b>	Inbound AM timepoint adjustments and outbound PM timepoint adjustments	Improve reliability
<b>190 Valley Express</b>	Inbound AM timepoint adjustments and outbound PM timepoint adjustments	Improve reliability

<b>MAY 2019 SERVICE CHANGES</b>		
<b>ROUTE</b>	<b>ADJUSTMENT</b>	<b>RATIONALE</b>
<b>20 SFCC</b>	Delete the 7:37 am outbound weekday Plaza “tripper” departure that operates when school is in session (trip not on the public schedule).	Low ridership; Regularly scheduled trip (7:42 am) has plenty of capacity. Saves one AM peak bus.
<b>23 Maple/Ash</b>	Inbound weekday timepoint adjustments	Improve reliability
<b>62 Medical Lake</b>	Convert outbound Route 64 trips departing the Plaza at 3:35 PM, 4:35 PM, & 5:35 PM that continue to Medical Lake at WPTC to outbound Route 62 trips.	Improve system legibility and customer information.
<b>64 Cheney/West Plains</b>	Convert outbound trips departing the Plaza at 3:35 PM, 4:35 PM, & 5:35 PM that continue to Medical Lake to Route 62 trips; Modify route to serve the Cheney Presley Dr./Salnave Rd. loop during peak periods in one direction.	Improve system legibility and customer information; Address feedback and Route 68 Cheney Local ridership decline after September 2018 changes
<b>66 EWU</b>	Convert some AM trips to Route 64 trips to serve the Presley Dr./Salnave Rd. loop and other schedule adjustments.	Associated with proposed adjustments to local Cheney service.
<b>67 Swoop Loop (NEW)</b>	Introduce a new route that provides local service in Cheney in a counter-clockwise loop during the EWU regular academic year on weekdays only.	Address feedback and Route 68 Cheney Local ridership decline after September 2018 changes
<b>68 Cheney Loop &lt;formerly Cheney Local&gt;</b>	Modify the routing to operate in a clockwise-only loop providing 30-minute frequency 7-days a week, year-round.	Address feedback and Route 68 Cheney Local ridership decline after September 2018 changes
<b>90 Sprague</b>	Minor schedule adjustments to the last outbound departures all service days to arrive at the VTC earlier	Associated with adjustments to Route 95
<b>95 Mid-Valley</b>	Extend the last outbound trip all service days to the Mirabeau Park & Ride	Improve mobility and customer information
<b>96 Pines/Sullivan</b>	Change the end of the line layover location to N. Progress Rd. and E. Trent across from Cenex gas station	Development on adjacent property enables an improved, safer layover location, which includes a convenience store and restroom for coach operators.

<b>SEPTEMBER 2019 SERVICE CHANGES</b>		
<b>ROUTE</b>	<b>ADJUSTMENT</b>	<b>RATIONALE</b>
<b>4 (New)</b>	New route operating between 5-Mile Park & Ride and the new Moran Station Park & Ride via downtown that combines existing Routes 24, 44 & the Regal segment of Route 45. The route will use	<i>STA Moving Forward</i> improvement

SEPTEMBER 2019 SERVICE CHANGES		
ROUTE	ADJUSTMENT	RATIONALE
	an interim layover until Moran Station Park & Ride is complete.	
<b>11 Plaza/Arena Shuttle</b>	Delete 5:35 PM inbound trip	Blocking changes
<b>20 SFCC</b>	City Loop disconnected; modified to serve the new SFCC off-street station upon completion; Timepoint adjustments; Interlined with routes 26/28 at the Plaza. The route will be on detour until SFCC transit station is complete.	City Loop disconnected to implement the new Route 4, an <i>STA Moving Forward</i> improvement; New SFCC station will improve customer experience and will allow for frequency improvements on Route 33 on Sunday/Holidays
<b>21 West Broadway</b>	Inbound timepoint adjustments weekdays	Related to Plaza zone reconfigurations
<b>22 Northwest Blvd</b>	Add an extra bus during the weekday afternoon peak period with related timepoint adjustments; Interline with the Route 23 weekends	Improve reliability of routes 22 and 27; Blocking changes
<b>23 Maple/Ash</b>	Interline with the Route 22 weekends; inbound zone changes	Blocking changes
<b>24 Monroe</b>	Discontinued and replaced by the new Route 4.	<i>STA Moving Forward</i> improvement
<b>25 Division</b>	Timepoint adjustments; New early weekday inbound trip interlined with new early AM Route 64 Cheney/West Plains	Plaza Zone changes; Improve mobility
<b>26 Lidgerwood</b>	Timepoint adjustments; Interline with the Route 20 weekdays and Route 28 weekends	Related to the disconnection of the City Loop to implement the new Route 4, an <i>STA Moving Forward</i> improvement; Blocking changes
<b>27 Hillyard</b>	Add an extra bus during the weekday afternoon peak with related timepoint adjustments; New early AM weekday outbound trip	Improve reliability of routes 22 and 27; Improve mobility; Blocking changes
<b>28 Nevada</b>	Timepoint adjustments; Interline with Route 20 weekdays and Route 45 nights and weekends	Related to the disconnection of the City Loop to implement the new Route 4, an <i>STA Moving Forward</i> improvement; Blocking changes
<b>29 SCC</b>	Timepoint adjustments; Modify the route to operate on Martin Luther King Blvd; Timepoint adjustments; Interline with the Route 34 weekdays at SCC Modify routing to serve new SCC Transit Center upon completion	Trent Ave bridge closure east of Hamilton; Related to disconnection of the City Loop to implement the new Route 4, an <i>STA Moving Forward</i> improvement; Serve new SCC Transit Center

SEPTEMBER 2019 SERVICE CHANGES		
ROUTE	ADJUSTMENT	RATIONALE
<b>32 Trent/Montgomery</b>	Timepoint adjustments; Modify routing to serve the new SCC Transit Center upon completion; New timepoint at Trent @ Havana	Improve reliability (avoid buses running hot); Serve new SCC Transit Center; Improve customer trip planning
<b>33 Wellesley</b>	Timepoint adjustments related to the City Loop disconnection; Modified to serve the new SFCC off-street station and SCC Transit Center upon completion; Increased frequency on Sunday; Interline changes	Related to the disconnection of the City Loop to implement the new Route 4 an <i>STA Moving Forward</i> improvement and new SCC Transit Center and SFCC Station; improve Sunday mobility
<b>34 Freya</b>	Reduce weekday frequency; Eliminate Sprague and Havana out of direction routing; Interline changes	Weak ridership on the route does not justify current 15-minute frequency; Streamline routing for faster, more direct trips; Interline changes are related to the disconnection of the City Loop
<b>39 Mission</b>	Timepoint adjustments; Serve new SCC Transit Center upon completion	Related to the new Transit Center at SCC
<b>42 South Adams</b>	Weekend inbound zone changes; Interline with the Route 27 weekends	Blocking changes
<b>43 Lincoln/37th Ave</b>	Route extended to serve 37 <sup>th</sup> east of Regal, Ray St, and 29 <sup>th</sup> Ave; Interline with Route 34 weekdays	Help maintain frequency on 29 <sup>th</sup> through Lincoln Heights since frequency on the Route 34 will be reduced; Related to the disconnection of the City Loop to implement the new route 4
<b>44 29th Ave</b>	Discontinued and replaced by the new routes 4 and 144.	<i>STA Moving Forward</i> improvement
<b>45 Perry District</b>	Terminate at the South Hill Park & Ride; Rebrand the “Perry District”; Timepoint adjustments	The new route 4 will serve the Southeast Blvd, Regal St and 57th Ave segments of the existing route
<b>60 Airport via Browne’s Addition</b>	Night and weekend inbound timepoint adjustments	Enable connections with new Route 63 at Hayford Rd
<b>61 Highway 2 via Browne’s Addition</b>	Night and weekend inbound timepoint adjustments; New early AM weekday inbound trip	Enable connections with new Route 63 at Hayford Rd; Improve mobility
<b>62 Medical Lake</b>	Schedule adjustments	Better serve Medical Lake Hospital employee shifts
<b>63 Airway Heights/West Plains (New)</b>	New route provides hourly service between Airway Heights and the West Plains Transit Center via the Spokane Airport and eventually Geiger Blvd (new Amazon site). The route will begin operating on I-90 between the West Plains Transit Center and Geiger exit 276 until construction on Geiger Blvd is complete.	<i>STA Moving Forward</i> improvement



SEPTEMBER 2019 SERVICE CHANGES		
ROUTE	ADJUSTMENT	RATIONALE
<b>64 Cheney/West Plains</b>	Timepoint adjustments; New early AM weekday Plaza outbound trip interlined from new inbound Route 25 trip	Facilitate connections at the West Plains Transit Center; Improve mobility in Cheney
<b>66 EWU</b>	7:27 AM, 7:42 AM, 7:57 AM, and 8:42 AM weekday outbound trips deleted; 12:00 PM, 1:00 PM, 2:00 PM, 2:22 PM, 2:55 PM, 3:00 PM, 3:55 PM, and 5:22 PM weekday inbound trips deleted; 5:20 PM outbound trip converted to Route 64	Adjust to lower ridership; Improve mobility in Cheney
<b>74 Mirabeau/Liberty Lake</b>	Route extended east to serve the Meadowood Tech Campus on Mission Ave and Hawkstone in Liberty Lake (select trips); Timepoint and interline adjustments	Improve mobility in Liberty Lake; Changes related to Plaza zone reconfigurations
<b>90 Sprague</b>	Timepoint moved from Sprague & Havana to Sprague & Freya: Timepoint adjustments; New 5:27 AM outbound trip	Facilitate connections with the revised Route 34; Provide connections with early outbound VTC routes
<b>94 East Central/Millwood</b>	Timepoint changed to 2 <sup>nd</sup> @ Sherman (from Arthur); Weekday Plaza arrival changes	Changes related to Route 45 adjustments
<b>95 Mid-Valley</b>	Timepoint adjustments	Improve reliability (avoid running hot) and mobility
<b>96 Pines/Sullivan</b>	Start first outbound trip at the VTC consistent with other outbound VTC routes; Weeknight timepoint adjustments	Improve reliability and connections
<b>97 South Valley</b>	Timepoint adjustments to last inbound trip all service days	Improve reliability
<b>98 Liberty Lake via Sprague</b>	Timepoint adjustments	Improve reliability and mobility
<b>124 North Express</b>	Timepoint adjustments	Accommodate new interline with Route 144 and Plaza zone revisions
<b>New 144 South Express (New)</b>	Provide peak express service weekdays from the new Moran Station Park & Ride to Downtown Spokane via 57 <sup>th</sup> Ave, Grand Blvd, 29 <sup>th</sup> Ave and Bernard St. Interim layover location will be used until Moran Station Park & Ride is complete.	<i>STA Moving Forward</i> improvement; Preserve weekday service on 29 <sup>th</sup> Ave and Bernard as the 44B will be discontinued
<b>172 Liberty Lake Express</b>	Extend route to Hawkstone which provides new service on N Country Vista Blvd; Timepoint and interline adjustments	Improve access to the Hawkstone Development in Liberty Lake; Increase Paratransit boundary and provide more access to those services

<b>SEPTEMBER 2019 SERVICE CHANGES</b>		
<b>ROUTE</b>	<b>ADJUSTMENT</b>	<b>RATIONALE</b>
<b>173 VTC Express</b>	Timepoint adjustments	Related to Plaza zone reconfigurations
<b>190 Valley Express</b>	Timepoint adjustments	Related to Plaza zone reconfigurations
<b>341</b>	New route to that provides service between SCC and Freya and Hartson on SCC school days.	Augment frequency of the Route 34 though this section on school days.
<b>664 EWU South Hill Express</b>	8:00 AM outbound trip modified to depart South Hill P&R five minutes earlier	Provide consistency of Route 664 departure times

**Facility Site Equity Analysis**

There were no facilities constructed that required land acquisition and the displacement of persons from their residences and businesses. The Boone Northwest Garage was built on STA’s existing property in 2018 / 2019 but did not displace any residences or businesses. As part of the project, the City of Spokane vacated a short strip of right of way which Spokane Transit purchased, and an equity analysis was completed. The site was selected without regard to race, color, or national origin and there were no persons impacted by the siting of the facilities. There were no federal funds used for construction of the Boone Northwest Garage.

There are no planned facilities to be built within the next three years that will acquire a site equity analysis.

## **SECTION 10 MONITORING TRANSIT SERVICE**

## Part 1 Overview

FTA requires transit providers to monitor the performance of their transit system relative to their system-wide service standards and service policies (i.e. vehicle load, vehicle assignment, transit amenities, etc.) not less than every three years. In the following analysis, Spokane Transit Authority applies its established service standards and policies to a sample of minority routes. Below are the disparate impact policies used to monitor both service and fare changes. These policies will be used to determine whether a disparate impact exists on the basis of race, color or national origin.

### Service Change Disparate Impact Policy (minority)

***When a major service change impacts a census tract with a minority population that exceeds the average minority population of the service area by 10% or more, a disparate impact exists and the impacts will be assessed and evaluated for mitigation.***

The minority population in the PTBA is 15.4%. To determine if a disparate impact exists, each route impacted is analyzed to determine the percentage of minority population along that route. This is done by adding all the census tracts along that route. If the percentage is 16.9% or more, then a disparate impact exists.

### Fare Change Minority Disparate Impact Policy

***If a fare change affects fare categories or payment methods used disproportionately by minority populations (10% or greater) than the overall population, a fare change disparate impact exists and the impacts will be assessed and evaluated for mitigation.***

A board resolution or similar documentation is provided as evidence of the STA Board of Directors consideration, awareness and approval of the monitoring results for the 2020 Title VI Program. See Attachment E.

## Part 2 Sampling & Methodology

### Route Sampling

Spokane Transit Authority operates 43 fixed routes. Routes were selected for the sample to be included in this analysis based on the following factors:

- Routes selected represent all four geographical areas of the service area (north, south, east, and west).
- Routes selected serve census tracts with both higher and lower concentrations of minorities, allowing a basis for comparison between minority and non-minority routes.
- Routes selected provide a mix of frequent and basic service, designating higher and lower levels of frequency.
- The routes selected include five classified as minority routes three classified as non-minority routes.

Table 20 below shows the selected routes, minority census tracts along each route, percentage of revenue miles within these tracts, and the routes’ designation as “minority” or “non-minority”.

**Table 20 Minority Census Tracts Along Selected Routes**

<b>Sample Route</b>	<b>Minority Tracts along Route</b>	<b>Approx. % of Route in Minority Tracts</b>	<b>Designation</b>
<b>4</b>	5, 20, 24, 32, 49	28.1%	Non-minority
<b>26</b>	111.02, 112.01, 111.01, 4, 14, 25, 145	91%	Minority
<b>34</b>	26.02, 46.01, 29, 30, 145	97.6%	Minority
<b>43</b>	40, 46.01	25.4%	Non-minority
<b>61</b>	138, 104.01, 137, 36	88.5%	Minority
<b>68</b>	140.01, 140.02	100%	Minority
<b>94</b>	145, 30, 29	26%	Non-minority
<b>96</b>	126, 119, 117.02	59%	Minority

According to FTA, a minority transit route “has at least one-third of its total revenue mileage in a census block or block group, or traffic analysis zone(s) with a percentage of minority population that exceeds the percentage of minority population in the transit service area.” The vast majority of STA routes (33 out of 42 routes) meet this definition of a minority route.

**Analysis Methodology**

Consistent with FTA guidance the performance standards compared in this analysis are meant to ensure transit services and amenities are equitably distributed throughout the system. This entails an analysis of:

- Vehicle load (average peak load factor compared with load factor at capacity)
- Vehicle headway (basic vs. frequent)
- On-time performance
- Services accessibility (distance to a bus stop)
- Vehicle assignment
- Distribution of transit amenities

**Part 3 Data Collection**

**Vehicle Load**

STA sets a maximum load factor for each of its fixed routes based on the size of the coach used. This analysis uses estimated revenue miles, ridership, and trip length for 6:00-8:00 AM peak hours during October 2019, a month with no service holidays and with school in session. Table 21 below compares average peak load factors for each sample route – calculated by dividing AM peak loads for each route by the number of seats available on each coach – with the maximum load factor capacity.

**Table 21 Vehicle loads for minority and non-minority routes**

Sample Route	Designation	Vehicle Type	Number of Seats	AM Peak Average Load*	Peak Load Factor	Load Factor at Capacity
26	<b>Minority</b>	40	39	14.8	.38	2.05
34	<b>Minority</b>	40	39	10.8	.28	2.05
61	<b>Minority</b>	40	39	17.2	.44	2.05
68	<b>Minority</b>	35	32	6.4	.20	2.25
96	<b>Minority</b>	35	32	7.6	.24	2.25
<b>Average Minority Route Load Factor</b>						
4	<b>Non-Minority</b>	40	39	25.4	.65	2.05
43	<b>Non-Minority</b>	40	39	11.0	.28	2.05
94	<b>Non-Minority</b>	40	39	12.0	.31	2.05
<b>Average Non-Minority Route Load Factor</b>						

All routes meet the performance standard, being well within the load factor capacity. The sampled minority routes have an average load factor of 0.31, and non-minority routes an average of 0.41.

**Vehicle Headway**

All STA urban routes are required to provide peak headways of 30 minutes or better (60 minutes or better for interurban routes). “Basic” service is defined as providing headways of 30 minutes or better, while “frequent” service provides headways of 15 minutes or better.

**Table 22 Vehicle headways for minority and non-minority routes**

Sample Route	Designation	Service Type	Peak Headway	Base Headway	Sub-Base Headway		
					Late Night	Sat Peak	Sun Peak
26	<b>Minority</b>	Basic	30	30	60	60	60
34	<b>Minority</b>	Basic	30	30	60	60	60
61	<b>Minority</b>	Basic	30	30	60	60	60
68	<b>Minority</b>	Basic	30	30	30	30	30
96	<b>Minority</b>	Basic	30	30	60	60	60
<b>Average Minority Route Headway</b>			<b>30</b>	<b>30</b>	<b>54</b>	<b>54</b>	<b>54</b>
4	<b>Non-Minority</b>	Frequent	15	15	30	30	30
43	<b>Non-Minority</b>	Basic	30	30	60	60	60
94	<b>Non-Minority</b>	Basic	30	30	60	60	60
<b>Average Non-Minority Route Headway</b>			<b>25</b>	<b>25</b>	<b>50</b>	<b>50</b>	<b>50</b>

Findings of Vehicle Headway: All of the sampled routes meet the 30-minute vehicle peak headway performance standard.

**On-Time Performance**

STA’s on-time performance objective is 93% or greater. A report was run using Micro Strategy software that analyzes time point performance data from Trapeze Computer Aided Dispatch (CAD). The reporting period was for 2019. The report provides on-time and late counts with a total count provided by route. The percentage of late counts were subtracted from total counts to provide the percentage of on-time counts. Reporting on-time performance using CAD data is a relatively recent practice for STA. The on-time performance standard was adopted when on-time performance was reported using representative surveys collected in the field by supervisors. The CAD data represents considerably more data points than were analyzed before. Table 23 below shows the on-time performance for the sample routes.

**Table 23 On-time performance for minority and non-minority routes**

<b>Sample Route</b>	<b>Designation</b>	<b>On-Time Performance</b>
<b>4</b>	Non-minority	95%
<b>26</b>	Minority	93%
<b>34</b>	Minority	92%
<b>43</b>	Non-minority	94%
<b>61</b>	Minority	89%
<b>68</b>	Minority	98%
<b>94</b>	Non-minority	92%
<b>96</b>	Minority	91%

Of the routes sampled, only 2 met the 93% On Time Performance Standard. (Route 4, Non-Minority and Route 68, Minority). With the exception of Route 61 all routes were very close to meeting the standard. Route 61 experiences delays due to service onto an Air Force base. There are on going discussions on how to improve on-time performance when implementing future service changes.

### **Service Accessibility**

*Connect Spokane* sets out an accessibility policy stating that basic or HPT service “shall be available within no more than one-half mile of at least 80% of the PTBA population residing within urban areas”. According to 2018 population estimates provided by the Washington State Office of Financial Management Small Area Estimate program, STA is currently meeting this standard. See Table 24 below.

**Table 24 PTBA urban population within ½ mile of a bus stop**

<b>2018 urban population within ½ mile of an STA bus stop</b>	337,325
<b>2018 urban PTBA population</b>	417,919
<b>Percent</b>	81%

In addition, 78% (29 of 37) of the census tracts identified as minority have frequent service (15 minute or greater) at stops in the census tracts.

### **Vehicle Assignment**

STA’s vehicle assignment policy is as follows:

*STA bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route such as passenger loads and overall ridership of each route. Local routes with lower ridership*

*may be assigned a smaller fixed route vehicle. Some routes requiring tight turns on narrow streets may be operated with smaller fixed route vehicles. The age of the vehicle shall not be a consideration when assigning the vehicle to a particular maintenance garage for daily service.*

(Connect Spokane Annex 2, Page 114)

The table below shows the typical vehicles types assigned to the sample routes:

**Table 25 Vehicle Assignments**

<b>Sample Route</b>	<b>Designation</b>	<b>Typical Vehicle Assignment</b>	<b>Weekday Operating Characteristic Considerations</b>	<b>Special Weekend Assignments and Operating Characteristic Considerations</b>
<b>4</b>	<b>Non-Minority</b>	40 foot coach (hybrid or conventional)	Ridership warrants a 40' coach	No
<b>26</b>	<b>Minority</b>	Any 40' coach (though typically conventional)	Ridership warrants a 40' coach, a hybrid can be used but not as great of fuel savings	No
<b>34</b>	<b>Minority</b>	40 foot conventional	Ridership warrants	No
<b>43</b>	<b>Non-Minority</b>	Any 40' coach (though typically conventional)	Ridership warrants a 40' coach, a hybrid can be used but not as great of fuel savings	No
<b>61</b>	<b>Minority</b>	Any 40' coach (though typically conventional)	Ridership warrants a 40' coach, a hybrid can be used but not as great of fuel savings	No
<b>68</b>	<b>Minority</b>	Any 35' coach	Ridership warrants a 35' coach	No
<b>94</b>	<b>Non-Minority</b>	40' conventional	Ridership warrants 40' coach	No
<b>96</b>	<b>Minority</b>	Any 40' coach	Ridership warrants a 40' coach	No

All vehicle assignments for the sample routes are consistent with STA's vehicle assignment policy. STA also has a policy that all coaches shall accommodate bicycles. All coaches are outfitted with a bicycle rack on the front of the vehicle. As 2-position racks need to be replaced, they are being replaced with three-position racks.

**Distribution of Transit Amenities**

STA's policy states that installation of transit amenities along bus routes are based on the number of passenger boardings at stops, with variances from this policy to support connectivity of routes and riders with limited mobility.



## Signage

STA's policy states that, "All STA bus stops shall feature signs mounted in a uniform manner to identify the area as a stop and provide readable and accurate information." In late 2014, STA completed a project to replace all bus stop signs with new signs that included the agency name and logo, the route number, the stop number, website address, and the number for customer service along with icons that indicate that buses accommodate bike and wheelchairs. See figure 2 below.

Figure 2 Bus Stop Sign



## Benches

STA's policy is that local jurisdictions are responsible for the placement and maintenance of bus benches. Benches are provided at many stops through contracts between outdoor advertising companies and individual jurisdictions. STA makes recommendations to the jurisdiction about placement but does not monitor their provision.

## Shelters

STA's policy is that, "Stops to have shelters funded by STA must meet at least one of the following criteria:

- 25 or more weekday average boardings
- Transfer point between two or more routes
- Adjacent to a ridership generator with a high proportion of riders with limited mobility."

In 2019, Spokane Transit completed an inventory of amenity and ADA accessibility information for all bus stops in the STA system. The next step in the process is to develop policies for prioritizing bus stop improvements. Spokane Transit installed more shelters in 2019 than in any year previously. Implementation of service and capital improvements along the 4 Monroe-Regal route alone installed 21 shelters. The Division corridor was improved with nine shelters with additional shelters planned for 2020. Construction projects at SCC and SFCC installed a combined six shelters.

It is important to note that simply meeting STA policy is not a guarantee that a shelter will be constructed. In addition to funding, there must be sufficient space available to construct the concrete pad on which the shelter will be placed and a willing partner; either the local jurisdiction or a private landowner. STA does not own the property adjacent to a bus stop, in most instances, and therefore must have property owner approval before a shelter project can begin.

The table below shows shelter deficiencies for the sample routes.

**Table 26 Sample Route Shelters**

<b>Route</b>	<b>Designation</b>	<b>Stops that warrant a shelter but don't have one</b>
<b>4</b>	<b>Non-Minority</b>	6
<b>26</b>	<b>Minority</b>	0
<b>34</b>	<b>Minority</b>	2
<b>43</b>	<b>Non-Minority</b>	1
<b>61</b>	<b>Minority</b>	2
<b>68</b>	<b>Minority</b>	0
<b>94</b>	<b>Non-Minority</b>	2
<b>96</b>	<b>Minority</b>	0

There are some on the sample routes that need shelters but they are distributed between minority and non-minority routes. Stops that warrant a shelter are monitored as part of the Annual Passenger Facilities Report completed in June of every year.

## **Part 4 Conclusions**

### **Vehicle load**

All routes meet the maximum load standard, and no discrepancy exists between minority and non-minority routes.

### **Vehicle headway**

All routes meet the peak headway standard for basic service.

### **On-time performance**

Three of five sampled minority routes and one of three non-minority routes sampled fall short of the 93% on-time performance service standard. Routes not meeting the on-time performance measure will be monitored.

### **Service accessibility**

STA meets its overall service accessibility standard. Minorities are on average are more closely served by transit than non-minorities.

### **Vehicle assignment**

Vehicle assignment is consistent with STA service standards on all routes.

**Distribution of transit amenities**

The standards for signage, benches and bicycle facilities are met. System wide there are many stops that warrant a shelter but are not outfitted with one. STA has planned investments to begin to address this but it will take time.

## **SECTION 11 STA BOARDS AND COMMITTEES**

## **Overview**

In addition to the Board of Directors, STA has four committees that consist of non-elected members of the public. The duties of the Board and each committee are summarized below. Within the Title VI Circular (FTA C 4702.1B), FTA requires that STA include a table depicting the racial distribution of the members of all its non-elected committees and councils. In addition to this, a STA must include a description of the process the agency uses to encourage participation of minorities on such committees.

## **STA Board of Directors and Committees**

### **STA Board of Directors**

The Board of Directors provides the policy and legislative direction for Spokane Transit and its administrators and approves its actions, budgets and long-term plans. It also has the authority with voter approval to levy taxes as authorized by state law (RCW 36.57A). By state law, the Board is composed of nine elected officials from the jurisdictions served by the Public Transportation Benefit Area, which includes the cities of Airway Heights, Cheney, Medical Lake, Millwood, Liberty Lake, Spokane, Spokane Valley and some unincorporated portions of Spokane County. There is also a non-voting member on the Board that represents labor.

### **Citizen Advisory Committee**

The Spokane Transit Citizen Advisory Committee (CAC) is comprised of members of the public who are residents of Spokane County. According to the committee's charter, its mission is to:

- Increase public participation in the functions of Spokane Transit.
- Ensure accountability of the organization's actions.
- Act as an educational arm of the organization to reach out to the public.
- Act as a focused, educated forum for public input and feedback to the organization.
- Represent a wide range of stakeholders and transit service employees.

STA's advertises open positions for the committee in the *Spokesman Review* and also on the STA website. The STA Board of Directors expects CAC members to introduce and talk about STA in as many venues as are open to the member. To this end, during the membership selection process, weighted value will be given to those who are active participants in other area organizations. This includes organizations that serve minority populations.

### **Paratransit Users Group**

Paratransit User Group (PUG) is a group of paratransit customers and service providers that discuss developments within Paratransit and provide feedback on proposed changes and new processes/technologies impacting the service. PUG members are recruited by recommendation of paratransit drivers and reservationists. When individuals are interested in making improvements to paratransit service there asked to join the group when a vacancy occurs. Notice of vacancies and opportunities to join are also posted on STA's website.

### **Central City Line Steering Committee**

The Central City Line Steering Committee is charged with providing policy-level advisory input and direction to the STA Board, the City of Spokane and their respective staff members at key decision

points in the implementation of the Central City Line and supportive land use and economic development policies. The membership of the committee is outlined by the joint resolution between the City of Spokane and STA that established the committee. The resolution lists agencies and organizations with an interest in the corridor that may appoint their representative.

**Table 27 Non-Elected Committees Minority Composition**

<b>Committee</b>	<b>Minority</b>	<b>Non-Minority</b>
<b>Citizen Advisory Committee</b>	0	11
<b>Paratransit Users Group</b>	0	12
<b>City Line Steering Committee</b>	0	20

**ATTACHMENT A 2018 Passenger Survey**

# Attachment A Passenger Survey

What route are you on: \_\_\_\_\_ What time of day is it: \_\_\_\_\_ Date: \_\_\_\_\_

## Title VI Survey

As part of Spokane Transit's Title VI Nondiscrimination Program requirements, we are requesting riders to complete a short demographic questionnaire. The information collected will be used to update our next Title VI Program. All information collected will be treated confidential.

**The questionnaire is voluntary. You are not required to disclose information.**

Please respond to the following questions:

<b>Section 1: Ethnicity, Income and Language</b>
General Ethnic Identification (check as many as apply): <input type="checkbox"/> African American <input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Asian <input type="checkbox"/> Caucasian <input type="checkbox"/> Hispanic or Latina/Latino <input type="checkbox"/> Native Hawaiian/Pacific Islander <input type="checkbox"/> Other (specify) _____
How many people are in your household: (Including yourself) <input type="checkbox"/> One <input type="checkbox"/> Two <input type="checkbox"/> Three <input type="checkbox"/> Four <input type="checkbox"/> Five <input type="checkbox"/> Six or More
What is your household income per year: <input type="checkbox"/> Less than \$12,140 <input type="checkbox"/> \$12,140 to \$16,459 <input type="checkbox"/> \$16,460 to \$20,779 <input type="checkbox"/> \$20,780 to \$24,999 <input type="checkbox"/> \$25,100 to \$29,419 <input type="checkbox"/> \$29,420 to \$33,739 <input type="checkbox"/> \$33,740 to \$38,059 <input type="checkbox"/> Above \$38,059 _____
How well would you describe your ability to speak English? <input type="checkbox"/> Very Well <input type="checkbox"/> Well <input type="checkbox"/> Not Well <input type="checkbox"/> Not at all
What Primary Language do you speak at home? <input type="checkbox"/> English <input type="checkbox"/> Spanish <input type="checkbox"/> Korean <input type="checkbox"/> Russian <input type="checkbox"/> German <input type="checkbox"/> Vietnamese <input type="checkbox"/> Chinese <input type="checkbox"/> Other (specify) _____
<b>Section 2: About this STA Trip</b>
What Spokane Transit bus route(s) do you ride? Please list: _____
What type of Fare are you using for this trip? <input type="checkbox"/> Adult 31-Day <input type="checkbox"/> 31-Day Reduced Fare <input type="checkbox"/> 7-Day Pass <input type="checkbox"/> Adult 2-Hour <input type="checkbox"/> Adult 2-Hour Reduced Fare <input type="checkbox"/> Day Pass <input type="checkbox"/> Youth 31-Day <input type="checkbox"/> City Ticket <input type="checkbox"/> Paratransit Pass <input type="checkbox"/> Employer provided Smart Card (City of Spokane, Spokane County, Etc.) <input type="checkbox"/> Student Pass (specify): _____
What type of pass are you using? <input type="checkbox"/> Pass (paper with magnetic strip) <input type="checkbox"/> Smart Card (plastic) <input type="checkbox"/> Other (specify) _____



<p>How did you pay for this trip?</p> <p><input type="checkbox"/> Cash                      <input type="checkbox"/> Credit/Debit Card                      <input type="checkbox"/> Check</p> <p><input type="checkbox"/> Employer Provided      <input type="checkbox"/> School provided (Student Pass)</p> <p><input type="checkbox"/> Community Organization (specify) _____</p> <p><input type="checkbox"/> Other (specify) _____</p>
<p>Where did you purchase your fare?</p> <p><input type="checkbox"/> Customer Service at the Plaza                      <input type="checkbox"/> On the Bus      <input type="checkbox"/> Pass by Mail</p> <p><input type="checkbox"/> Grocery Store or Convenience Store      <input type="checkbox"/> School or Employer Provided</p> <p><input type="checkbox"/> Other (specify) _____</p>
<p>How did you get to the bus stop to board this specific bus?</p> <p><input type="checkbox"/> Walked      <input type="checkbox"/> Biked      <input type="checkbox"/> Carpooled &amp; parked                      <input type="checkbox"/> Dropped off</p> <p><input type="checkbox"/> Transfer from route # _____                      <input type="checkbox"/> Drove to Park &amp; Ride</p> <p><input type="checkbox"/> Other (specify): _____</p>
<p>If you walked how long did you walk to the bus stop?</p> <p><input type="checkbox"/> Less than 1 minute      <input type="checkbox"/> 1-5 minutes      <input type="checkbox"/> 6-10 minutes</p> <p><input type="checkbox"/> 11-15 minutes                      <input type="checkbox"/> More than 15 minutes</p>
<p>Where did you start your trip?</p> <p>List cross streets/City/Destination: _____</p>
<p>Where will you end your trip?</p> <p>List cross streets/City/Destination: _____</p>
<p>What is the best way to get you information about STA?</p> <p><input type="checkbox"/> Spokane Transit Website                      <input type="checkbox"/> Spokane Transit Rider Alerts (email/text)</p> <p><input type="checkbox"/> System Schedules                      <input type="checkbox"/> 328-RIDE</p> <p><input type="checkbox"/> Plaza                      <input type="checkbox"/> Bus on-board signs and/or announcements</p> <p><input type="checkbox"/> Bus Driver                      <input type="checkbox"/> Social Media (Facebook, Twitter)</p> <p>Other (specify): _____</p>
<p>Do you use a smartphone?</p> <p><input type="checkbox"/> Yes                      <input type="checkbox"/> No</p>

Thank you for your Participation!

If information is needed in another language, contact (509) 325-6094.  
 Si necesita información en otro idioma, comuníquese al (509) 325-6094.  
 Для получения информации на другом языке звоните по тел. (509) 325-6094.  
 Nếu quý vị cần thông tin bằng một ngôn ngữ khác, xin vui lòng gọi số (509) 325-6094.

For more information on Title VI, visit STA's website on Title VI Requirements at:  
<https://www.spokanetransit.com/about-sta/title-vi-non-discrimination-policy>

# Attachment A Survey Results

# 2018



## STA Title VI Rider Survey

Robinson Research was commissioned by Spokane Transit Authority to administer, tabulate data, and analyze results for the 2018 Title VI Rider Survey.



# TABLE OF CONTENTS

<b>METHODOLOGY</b> .....	<b>2</b>
<b>EXECUTIVE SUMMARY</b> .....	<b>3</b>
<b>DATA</b>	
• Day/Time.....	<b>4</b>
• Q1 General Ethnic Identification.....	<b>5</b>
• Q2 How many people are in your household (including yourself)?.....	<b>6</b>
• Q3 What is your household income per year?.....	<b>7</b>
• Q4 How well would you describe your ability to speak English?.....	<b>8</b>
• Q5 What primary language do you speak at home?.....	<b>9</b>
• Q6 What Spokane Transit bus route(s) do you ride? (Please choose all that apply) .....	<b>10</b>
• Q7 What type of fare are you using for this trip?.....	<b>12</b>
• Q8 What type of pass are you using?.....	<b>13</b>
• Q9 How did you pay for this trip?.....	<b>14</b>
• Q10 Where did you purchase your fare?.....	<b>15</b>
• Q11 How did you get to the bus stop to board this specific bus?.....	<b>17</b>
• Q11B Transfer route # from Q11.....	<b>18</b>
• Q12 If you walked, how long did you walk to the bus stop?.....	<b>19</b>
• Q13 What is the best way to get you information about STA?.....	<b>20</b>
• Q14 Do you use a smart phone?.....	<b>21</b>

# METHODOLOGY

Robinson Research was commissioned by Spokane Transit Authority (STA) to conduct the Title VI Rider Survey of no fewer than 1,500 bus riders. Quotas were established for time of day, day of the week, and specific routes. The information from which the quotas were established was provided to Robinson Research from STA. A total of 1,677 completed surveys were collected.

The surveys commenced on the morning of Monday, October 22<sup>nd</sup>, and concluded on the evening of Sunday, October 28<sup>th</sup>. All subset quotas were met or exceeded in the data collection and no data weighting schemes were employed.

Although there have been on-board rider studies conducted by Robinson Research and other vendors since at least 2005, this is the first time Robinson Research has been asked for a proposal for a Title VI-specific survey. While other on-board fixed routed surveys have included comparisons to previous replications, this survey has no history to which comparisons could be made.

The questionnaires, including the response categories, along with the sample plan (routes/times of day/days of week) were all provided by STA.

Questions regarding this may be directed to:

**William D. Robinson**  
**President, Robinson Research**  
**1206 North Lincoln, Suite #200**  
**Spokane, WA 99201**  
**(509) 251-2503**

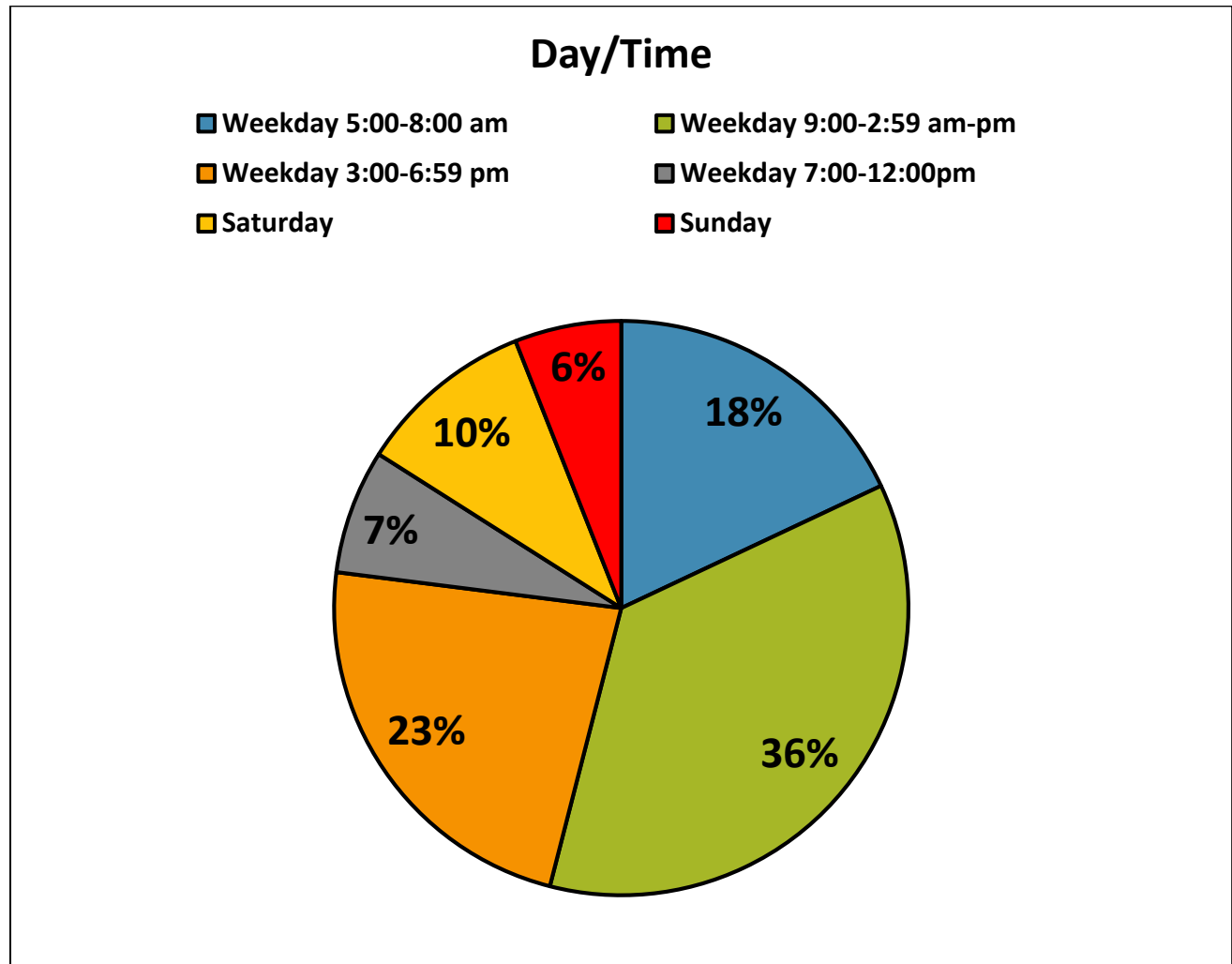
# EXECUTIVE SUMMARY

Most STA rider surveys have included aspects of attitudes and perceptions cross-tabulated against demographics and logistics of how patrons use STA bus service. This survey was overwhelmingly about demographics and transit access logistics. Surveys that are rich in attitudes and perceptions tend to provide more interesting correlations. The fact that this survey produced comparatively few interesting correlations is simply due to the need to illicit data other than attitudes and perceptions and was designed to determine how well STA service functions across a tested set of demographic variables.

Throughout this survey were examples of distribution of responses that were heavily clustered into one or two categories to the point that the other response categories were too sparsely populated to be suitable for analysis of correlations. A good example of this is the ethnic identification question in which three-fourths identified as Caucasian and none of the other seven pre-determined designations were checked by more than 10%. When asked to rate how well they speak English, 97% rated their ability as either Well or Very Well. That distribution of responses leaves no opportunity for subset analysis. The quotas were divided across 37 routes, four weekday times of day plus Saturday quotas and Sunday quotas equaling 198 combinations of route/day/time for an average of 8.47 respondents per quota group. Only the major routes (Sprague [90] and Division [25]) had sufficient quotas to support meaningful subset analysis by individual route. There were noteworthy subset anomalies noted when other tested variables were examined. These anomalies were noted in the question-by-question observations.

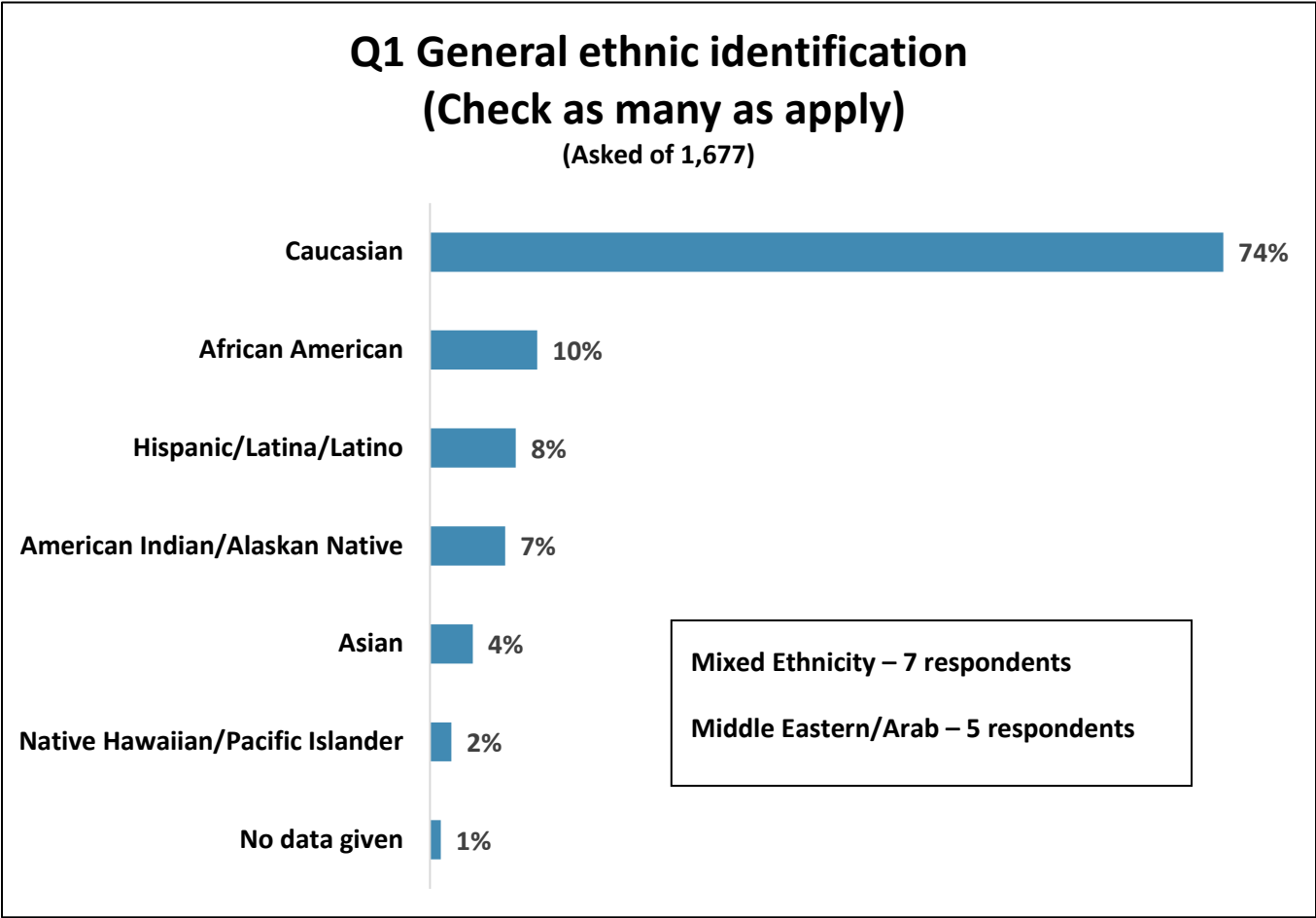
- Nearly half of respondents were using either an Adult 31-Day Fare (32%) or Adult 2-Hour Fare (15%).
- Three-fourths walked to the bus stop to board the bus upon which they were surveyed. One-in-eight (12%) transferred from another route.
- In a side note, data collection for this survey occurred at the peak of a pilot program testing pay-per-use Lime electric scooters and bicycles. Although the STA Plaza was surrounded by these rental vehicles, only one respondent reported using one to get to the bus stop.
- The typical respondent walked (based on estimates of the average using the available categories) for 5.36 minutes to get to the bus stop. Half of respondents reported a walking time between one and five minutes.
- Nearly half (45%) cited the Spokane Transit Website as the best way to receive information about STA.
- Four-fifths reported having a smart phone.

# DAY OF THE WEEK AND TIME OF DAY SAMPLING



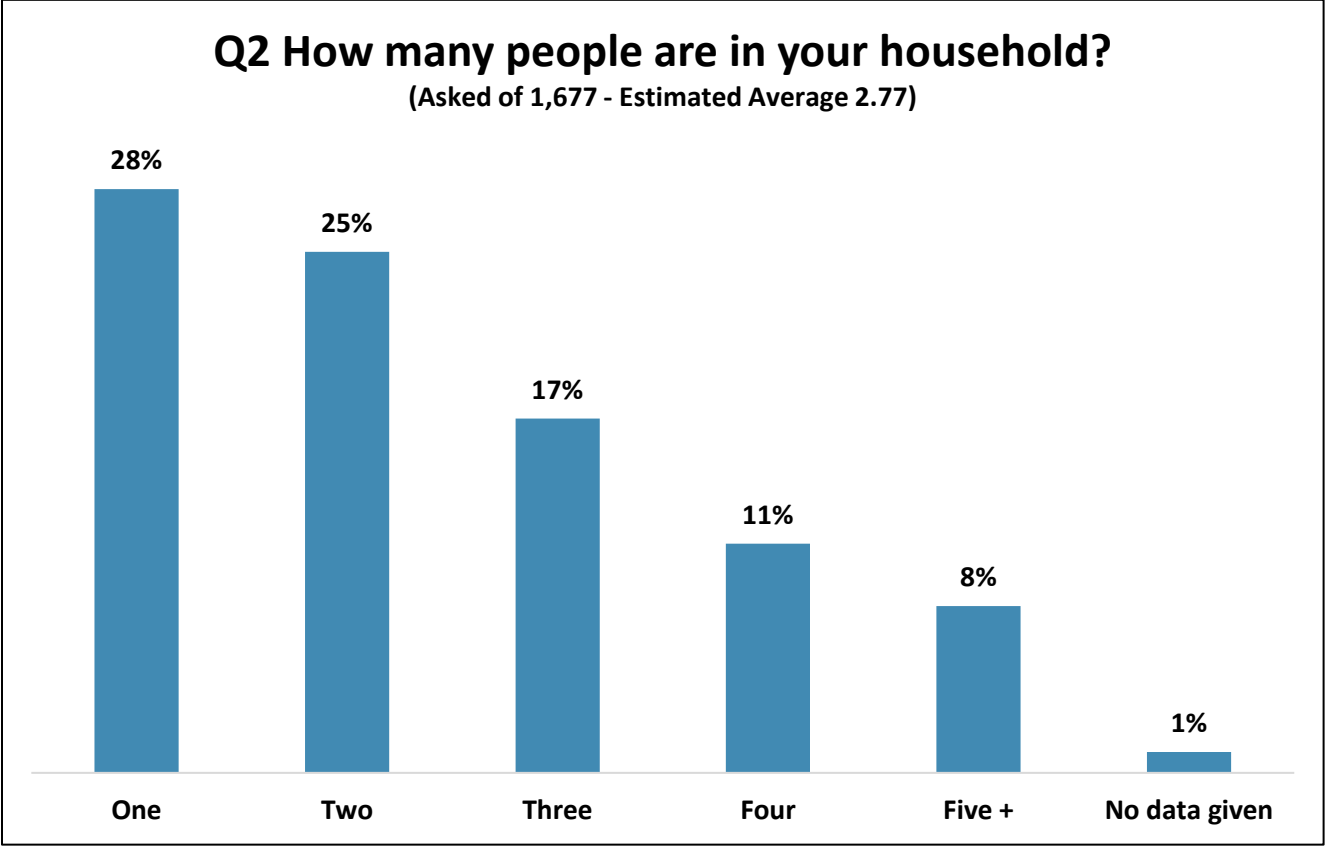
- The only time slot that consistently stood out was Weekday 5am-8am. There was a strong correlation between that time slot and use of a Park and Ride. Generally, as household incomes increased, so did likelihood of riding in the Weekday 5am-8am time slot.
- Route 90 and Route 25 showed lower than average likelihood of being used between 5am and 8am while Routes 43, 64 and 124 showed higher than average likelihood of being used during the Weekday 5am-8am time slot.

# Q1 GENERAL ETHNIC IDENTIFICATION



- With three-fourths self-reporting Caucasian ethnicity, and no other ethnicity accounting for more than one-in-ten, there were no statistically significant correlations between ethnicity and other tested variables.

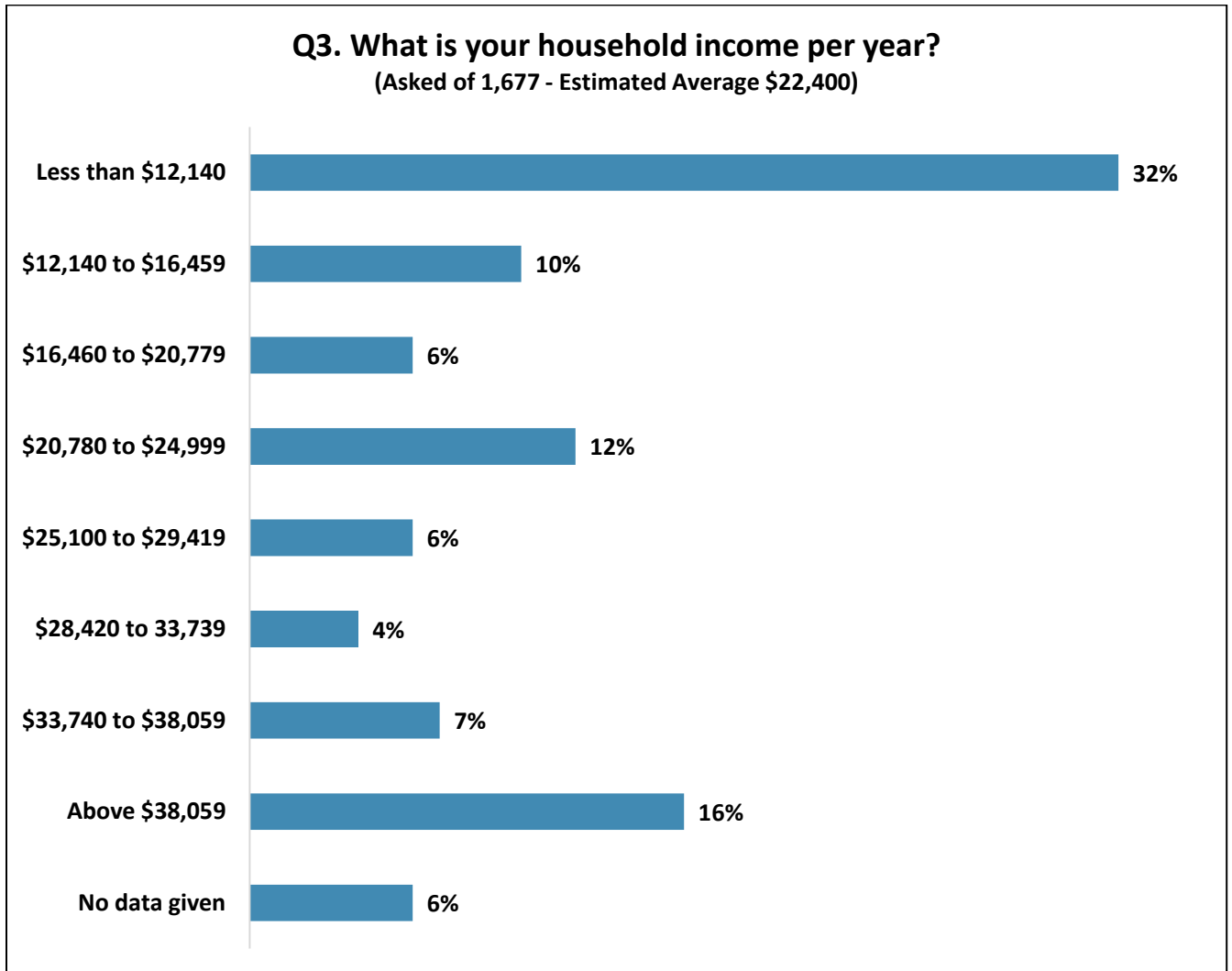
# Q2 HOW MANY PEOPLE ARE IN YOUR HOUSEHOLD (INCLUDING YOURSELF)?



- The “typical” household had 2.77 occupants. With the notable exception of household income, the number of occupants in the household was not a worthwhile predictor variable.
- For perspective, the US Census 2010-2016 projections show the average number of persons per household, in Spokane County, WA, as 2.46.

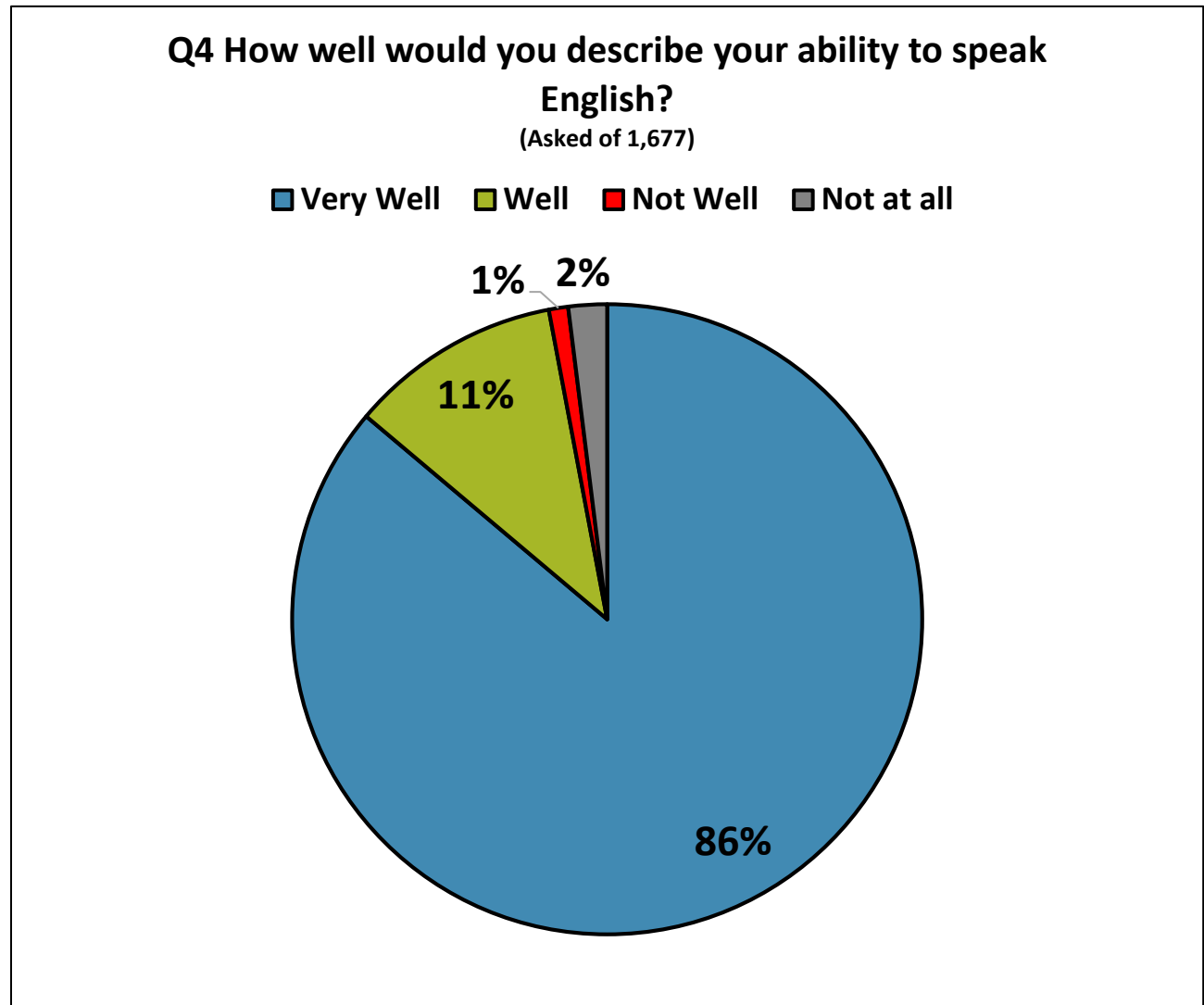


# Q3 WHAT IS YOUR HOUSEHOLD INCOME PER YEAR?



- Using the income categories supplied by STA that topped out at \$38,059, the average estimated household income was \$22,400.
- The average income among those reporting having a smart phone was about \$3,500 per year higher than those without a smart phone.
- The following routes showed lower than average household incomes: 29, 42, and 90.

# Q4 HOW WELL WOULD YOU DESCRIBE YOUR ABILITY TO SPEAK ENGLISH?



- There was a strong correlation between limited English-speaking ability and likelihood of not having a smart phone. Aside from smart phone, responses spanned the tested subsets quite evenly.

# Q5 WHAT PRIMARY LANGUAGE DO YOU SPEAK AT HOME?

Asked of 1,677 respondents.

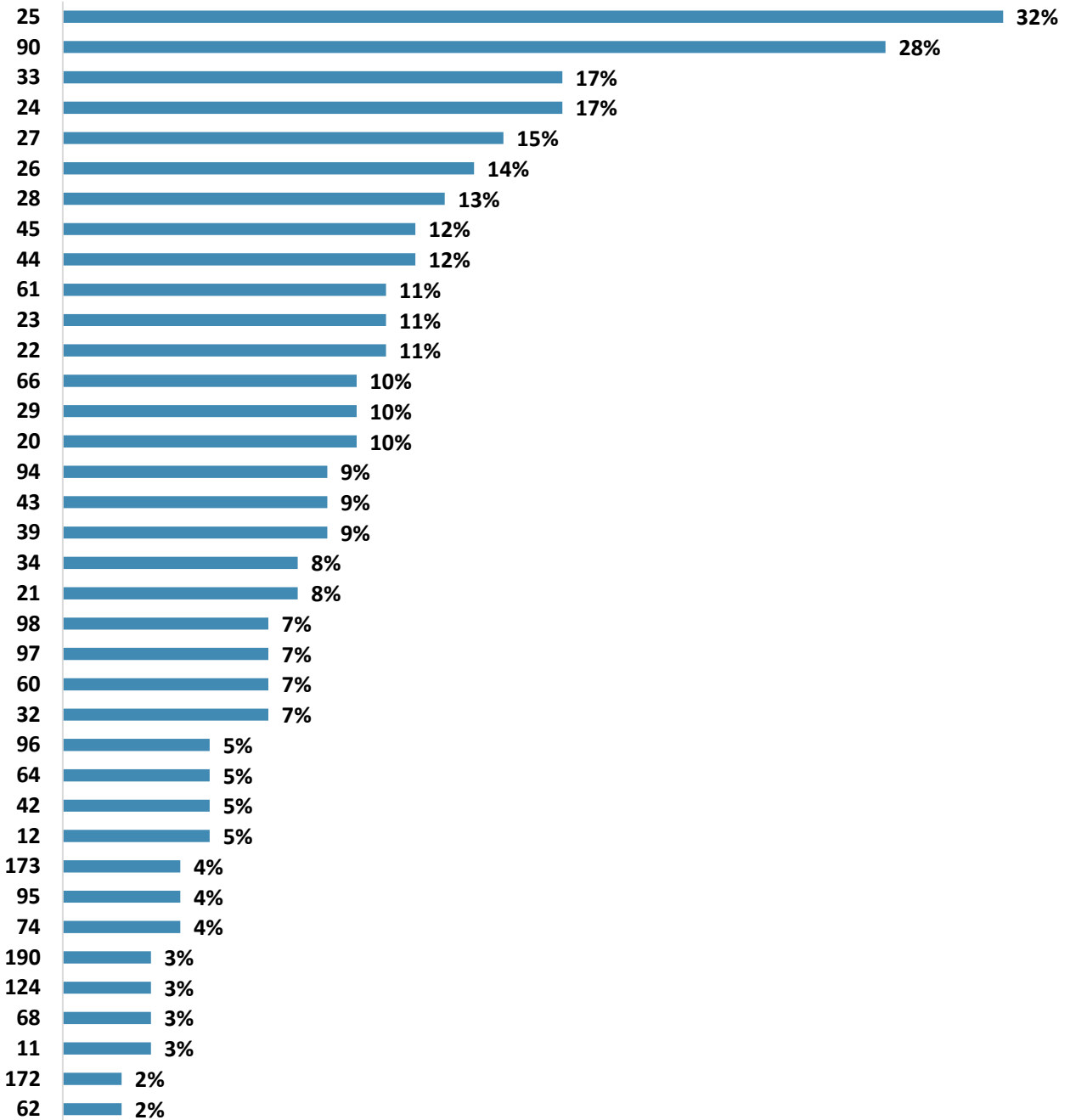
With 95% citing English as their primary language, and no other language checked by more than 1%, there were no discernable correlations between language spoken and other tested variables.

- English – 95%
- Spanish – 1%
- Arabic – 1%
- Vietnamese – 1%
- Marshallese – 7 respondents
- Chinese/Mandarin – 5 respondents
- Korean - 4 respondents
- French - 4 respondents
- Japanese - 4 respondents
- Russian - 3 respondents
- German – 3 respondents
- Napali - 2 respondents
- Indonesian - 2 respondents
- Tagalog/Filipino - 2 respondents
- American Sign Language - 1 respondent
- Gujasati (Indo-Aryan) - 1 respondent
- Cantonese - 1 respondent
- Sioux - 1 respondent
- Ethiopian - 1 respondent
- No data given – 8 respondents

# Q6 WHAT SPOKANE TRANSIT BUS ROUTE(S) DO YOU RIDE? (PLEASE CHOOSE ALL THAT APPLY)

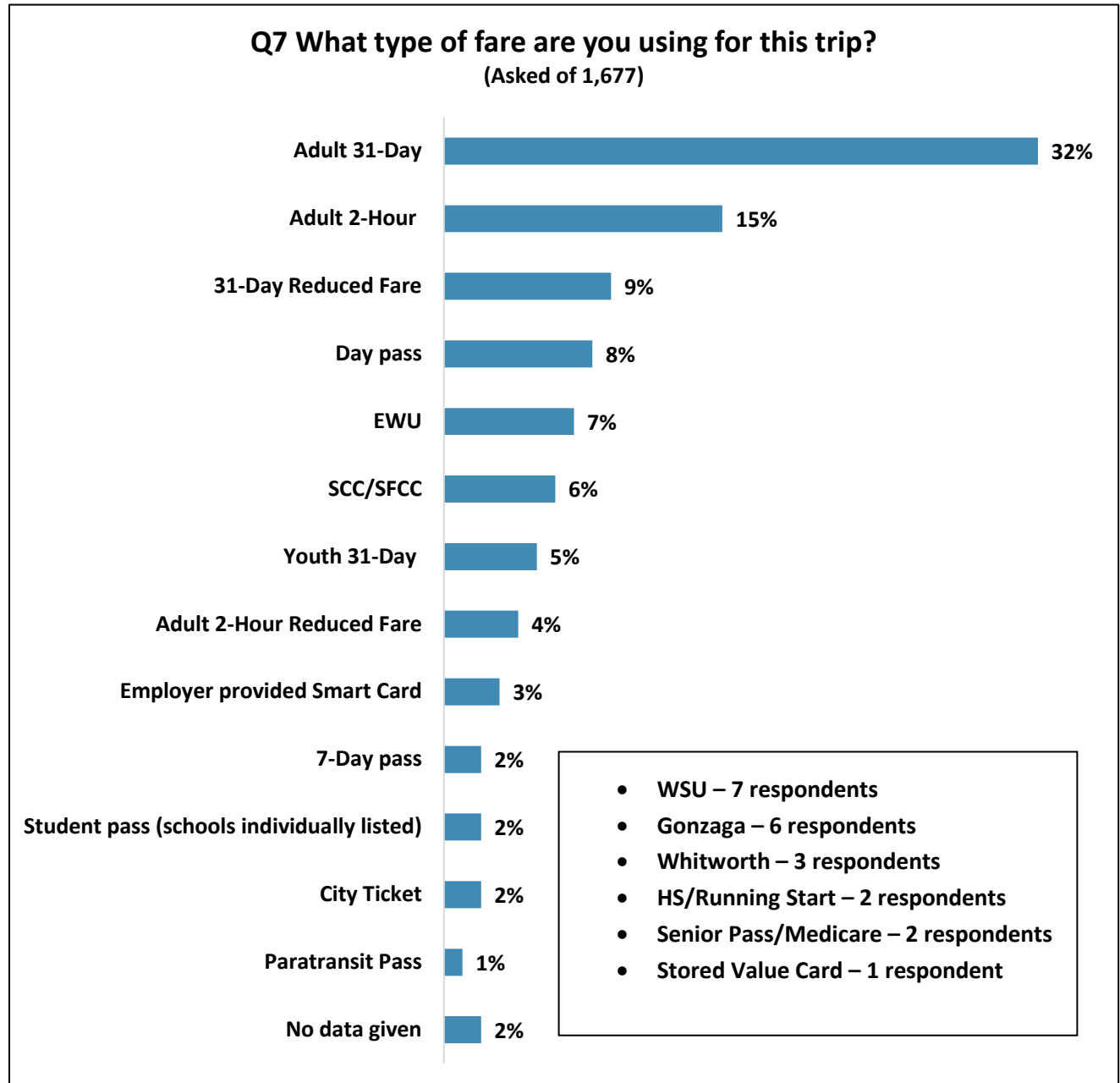


**Q7 What Spokane Transit bus route(s) do you ride?**  
 (Asked of 1,677 - Average routes/respondent - 3.42)



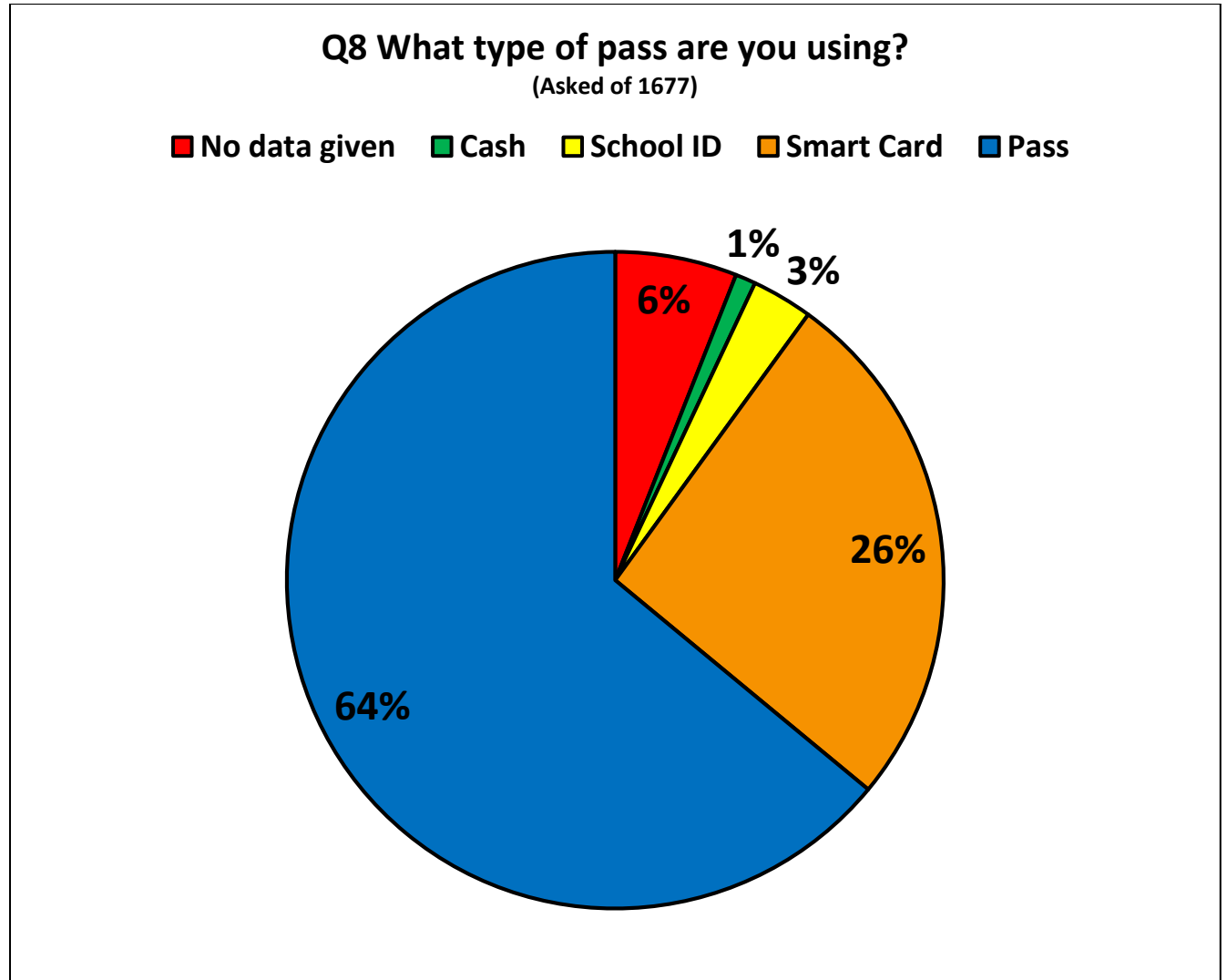
- From the 1,677 respondents, we received 5,732 specified routes written in.
- If a respondent provided no data, we wrote in the number of the route they were riding at the time they were surveyed.
- Including the routes written in by Robinson Research staff when entering the paper surveys, we see an average of 3.42 routes per respondent. These refer to self-reported (by memory) routes regularly ridden, not necessarily the routes included in the day they were surveyed (not checked off a list of all routes).
- With the data divided across 37 routes, and multiple route citations allowed, the cross-tabulation cells rarely contained rider counts that were specified in double digits, therefore, there were few identifiable correlations. There is a similar data field where we simply documented the route upon which each respondent was surveyed. That question allowed for designating only one route to be cited, not all routes that they typically ride. That single route data field provides more accurate correlations than does this question which allowed multiple route citations.

# Q7 WHAT TYPE OF FARE ARE YOU USING FOR THIS TRIP?



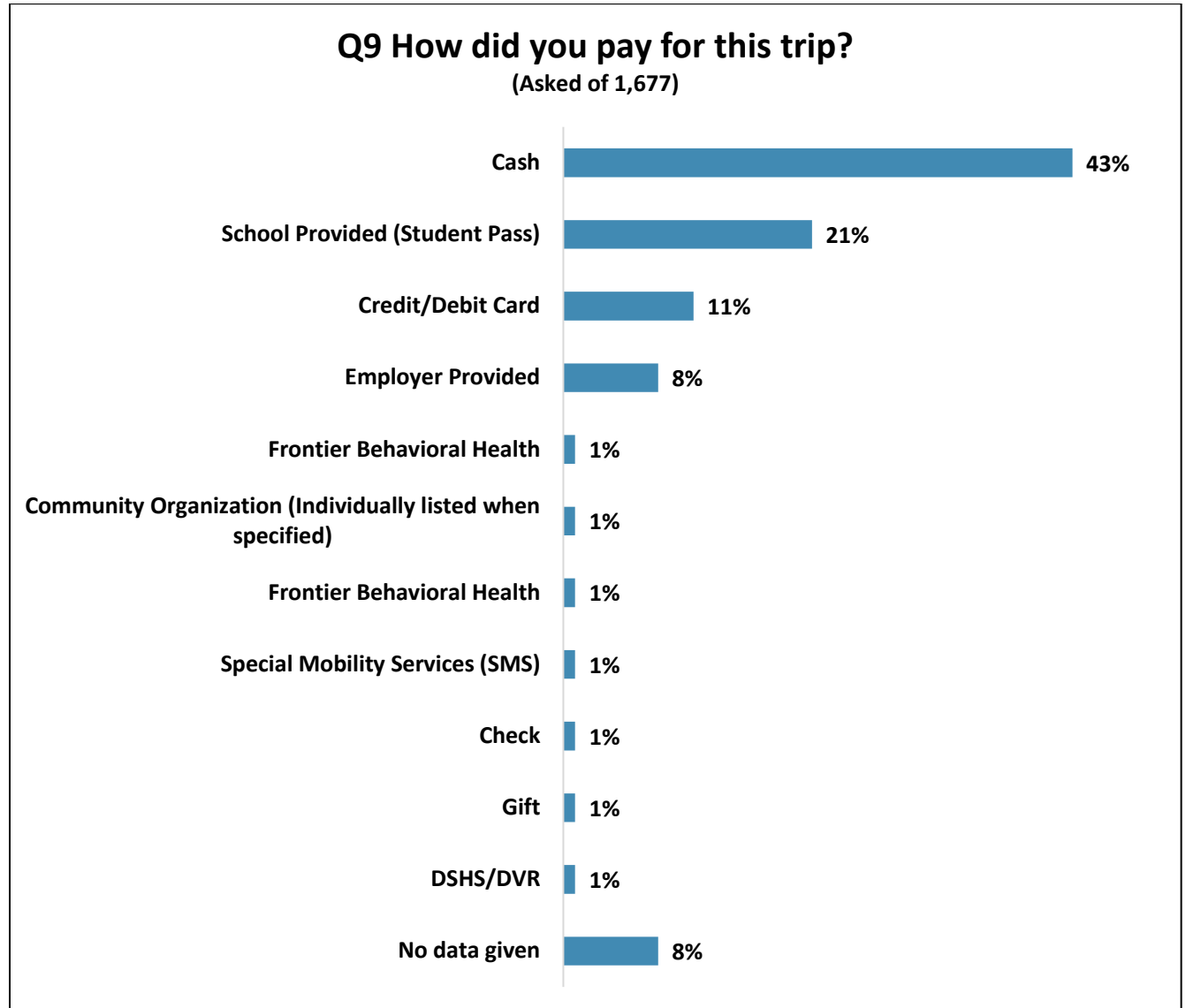
- Those who used the Park & Ride were significantly less likely than average to use Adult-31 Day, Adult 2-hour and 31-Day Reduced Fare while being significantly more likely than average to be using an EWU Fare.

# Q8 WHAT TYPE OF PASS ARE YOU USING?



- Those who self-described as American Indians/Native Alaskans, were more likely than average to be using a pass. While those who described themselves as Asian, and those with incomes above \$38,000, were significantly less likely than average to be using a pass. Those with incomes above \$38,000 were significantly more likely than average to be using a Smart Card.
- Transfer riders were less likely than average to be using a pass and more likely than average to be using a Smart Card.
- Those who used a Park & Ride were significantly less likely than average to be using a pass and significantly more likely than average to be using a Smart Card.

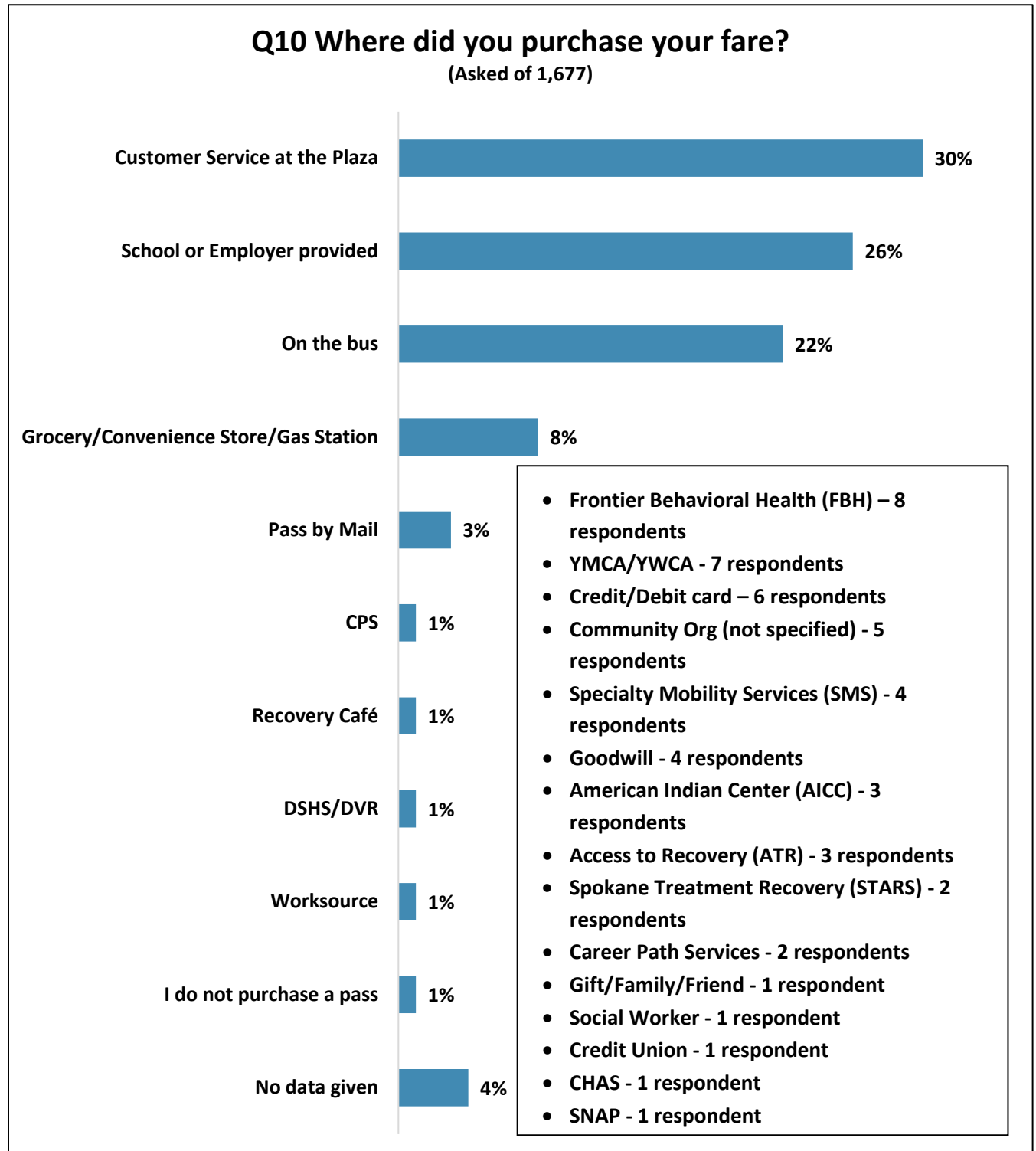
# Q9 HOW DID YOU PAY FOR THIS TRIP?



- Those who considered themselves to be African Americans were more likely than average to have paid cash, while those who identified as Asian were significantly less likely than average to have paid cash.
- Both Saturday and Sunday riders were more likely than average to have paid cash.
- Those with household incomes above \$38,000 were significantly less likely than average to have paid cash.

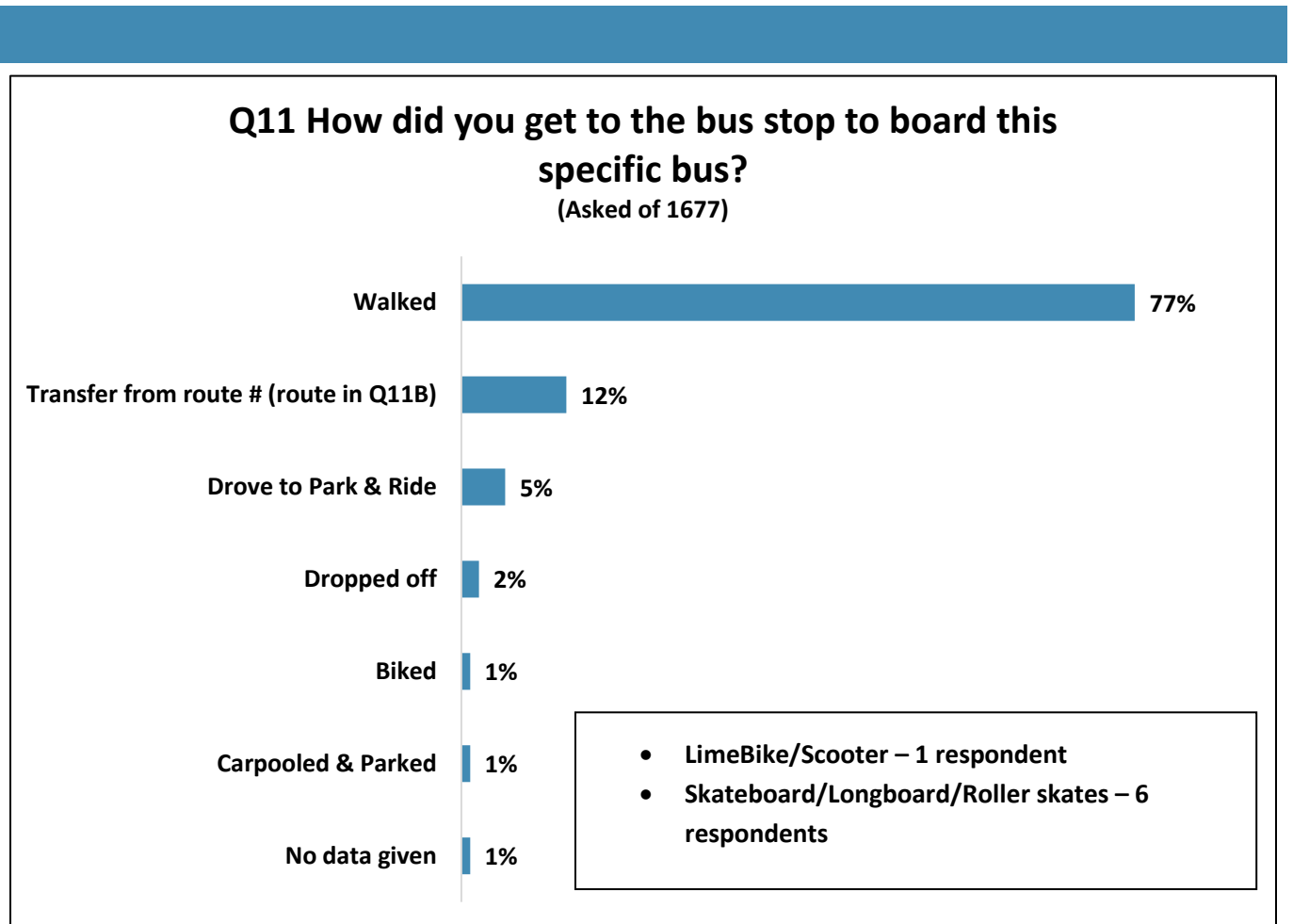


# Q10 WHERE DID YOU PURCHASE YOUR FARE?



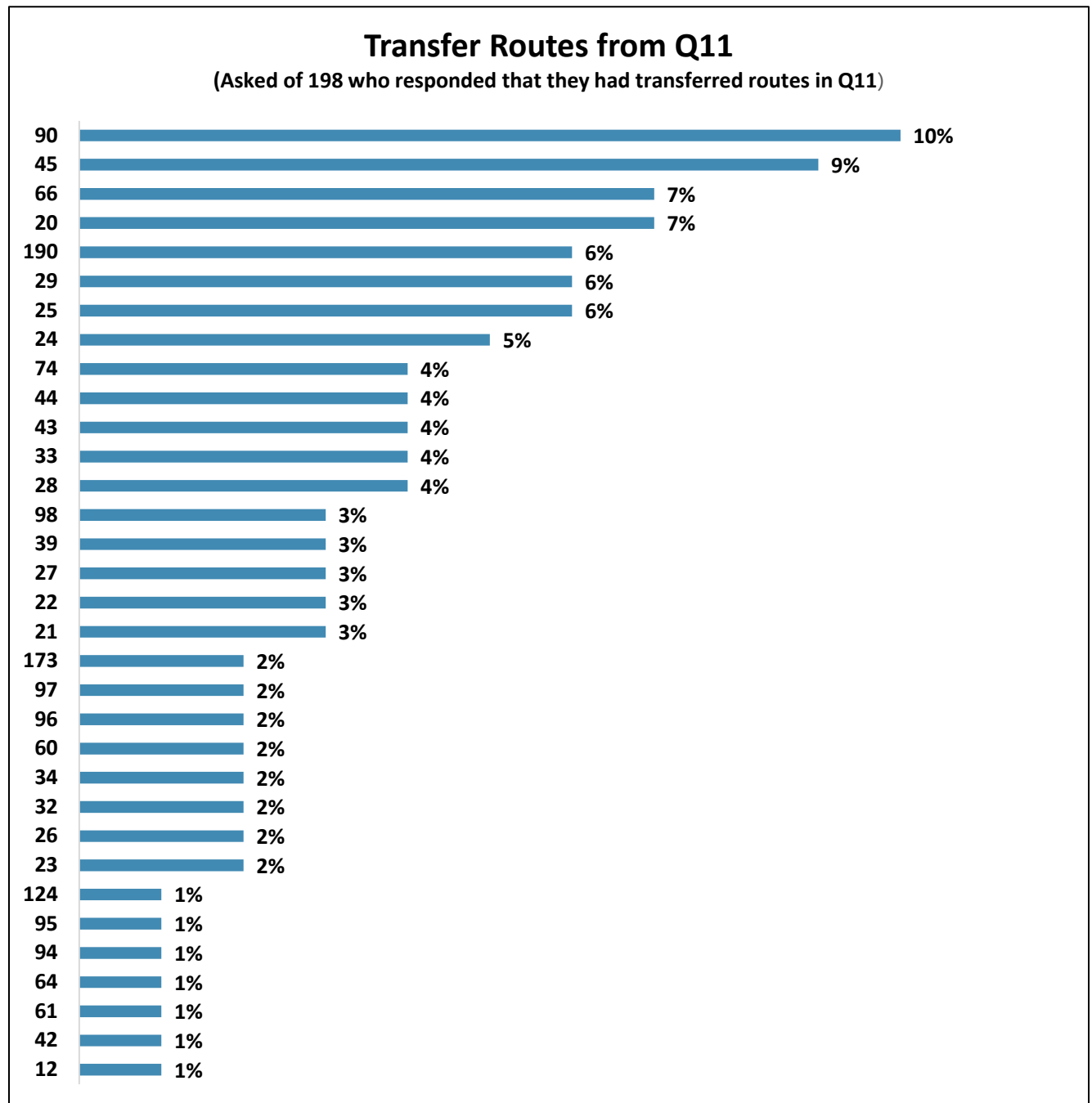
- **Park & Ride users and those with household incomes greater than \$38,000 were significantly less likely than average, to have purchased their fare at the Plaza.**
- **Those with no smart phone were significantly more likely than average to have purchased their fare at the Plaza.**

# Q11 HOW DID YOU GET TO THE BUS STOP TO BOARD THIS SPECIFIC BUS?



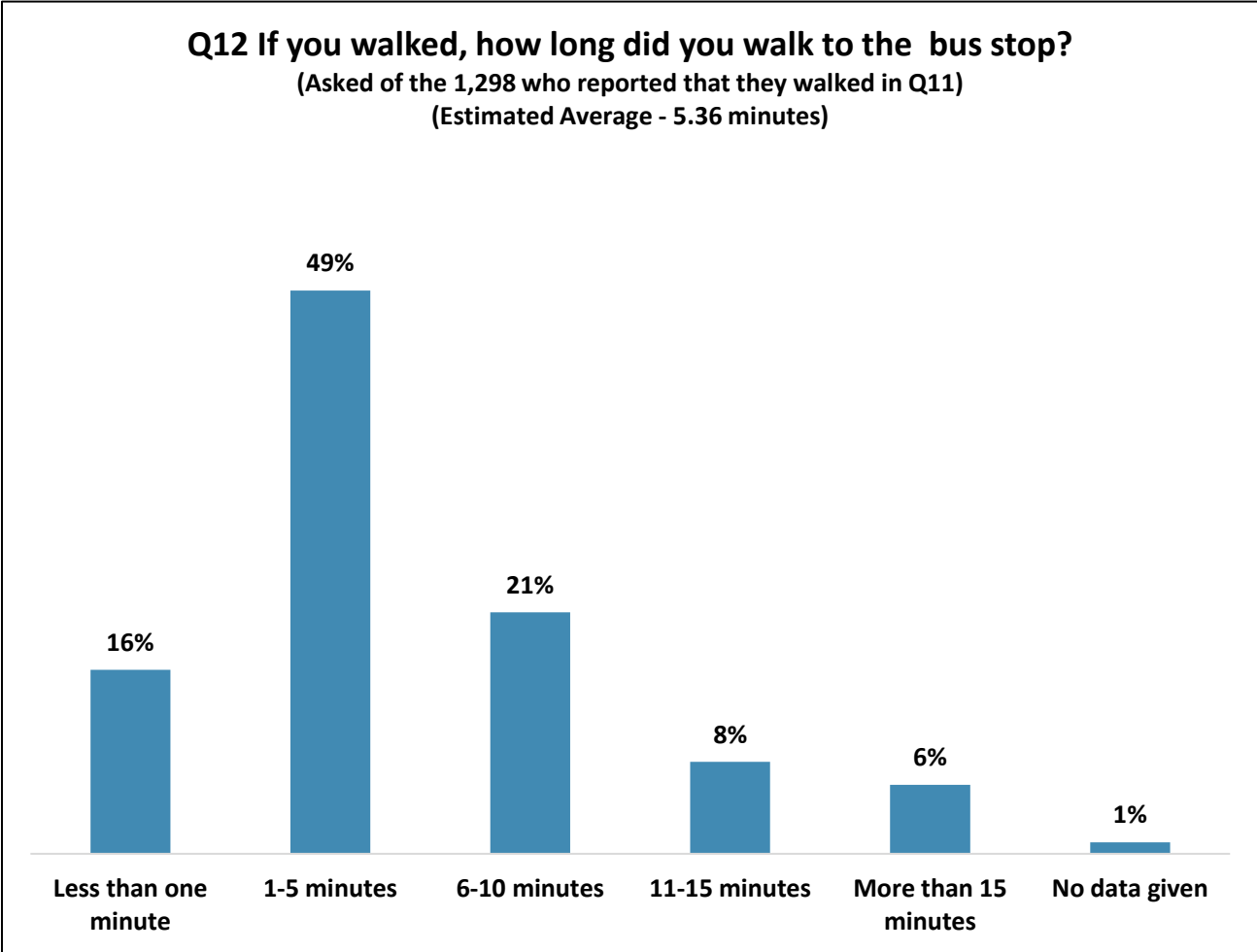
- Those who considered themselves to be African American or American Indian/Alaskan Native were more likely than average to have walked.
- Those surveyed between the hours of 5am-8am on Weekdays were less likely than average to have walked.
- Those with household income above \$38,000 were significantly less likely than average to have walked and significantly more likely than average to have driven to a Park & Ride.
- Likelihood of using the Park & Ride generally increased in step with household income.

# Q11B TRANSFER ROUTE # FROM Q11



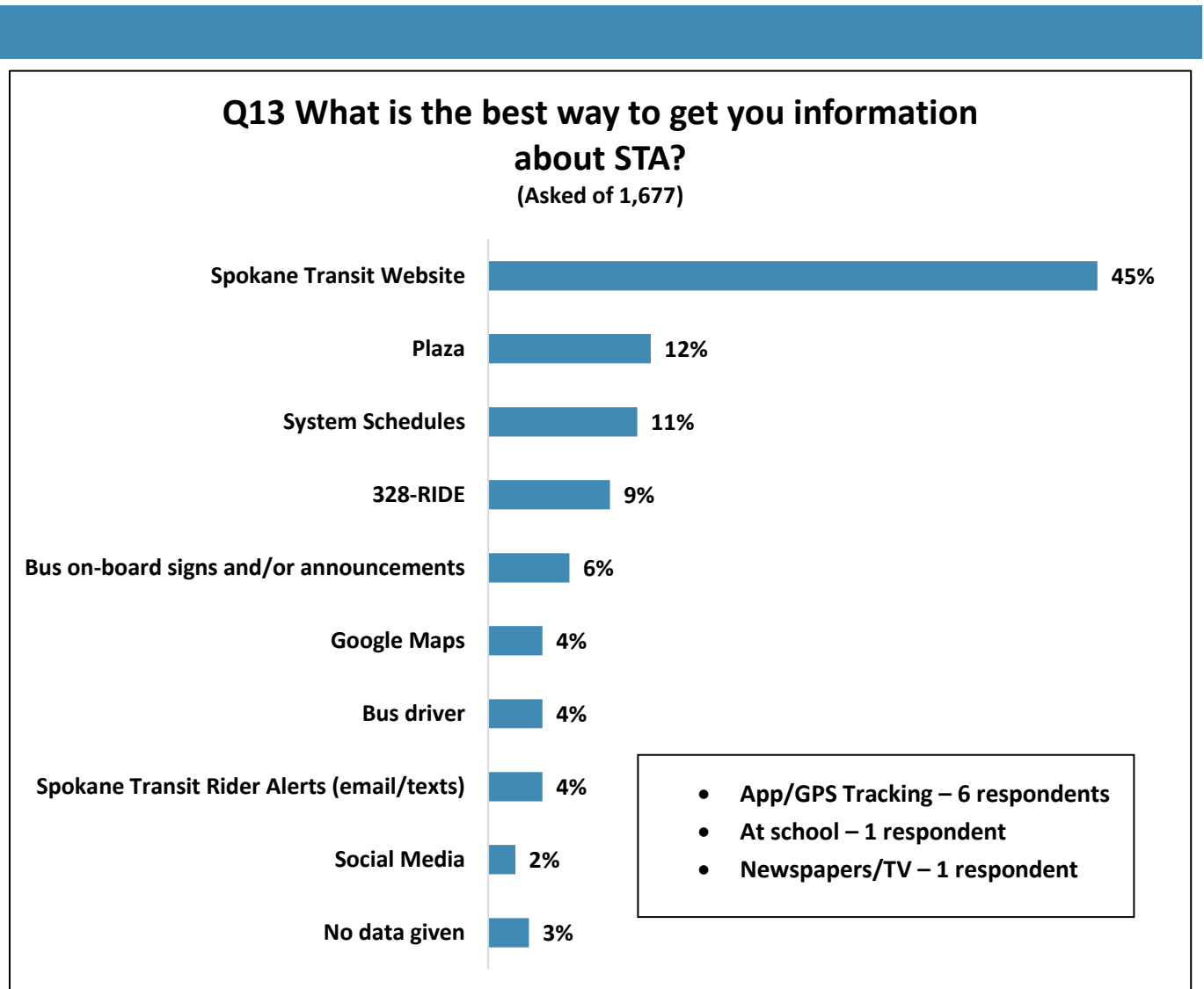
- This question was asked of the 198 who reported getting to their current route by transferring from another route.
- With only 198 respondents cross-tabulated against all routes from which they might have transferred, the cells were too small to support subset analysis.

# Q12 IF YOU WALKED, HOW LONG DID YOU WALK TO THE BUS STOP?



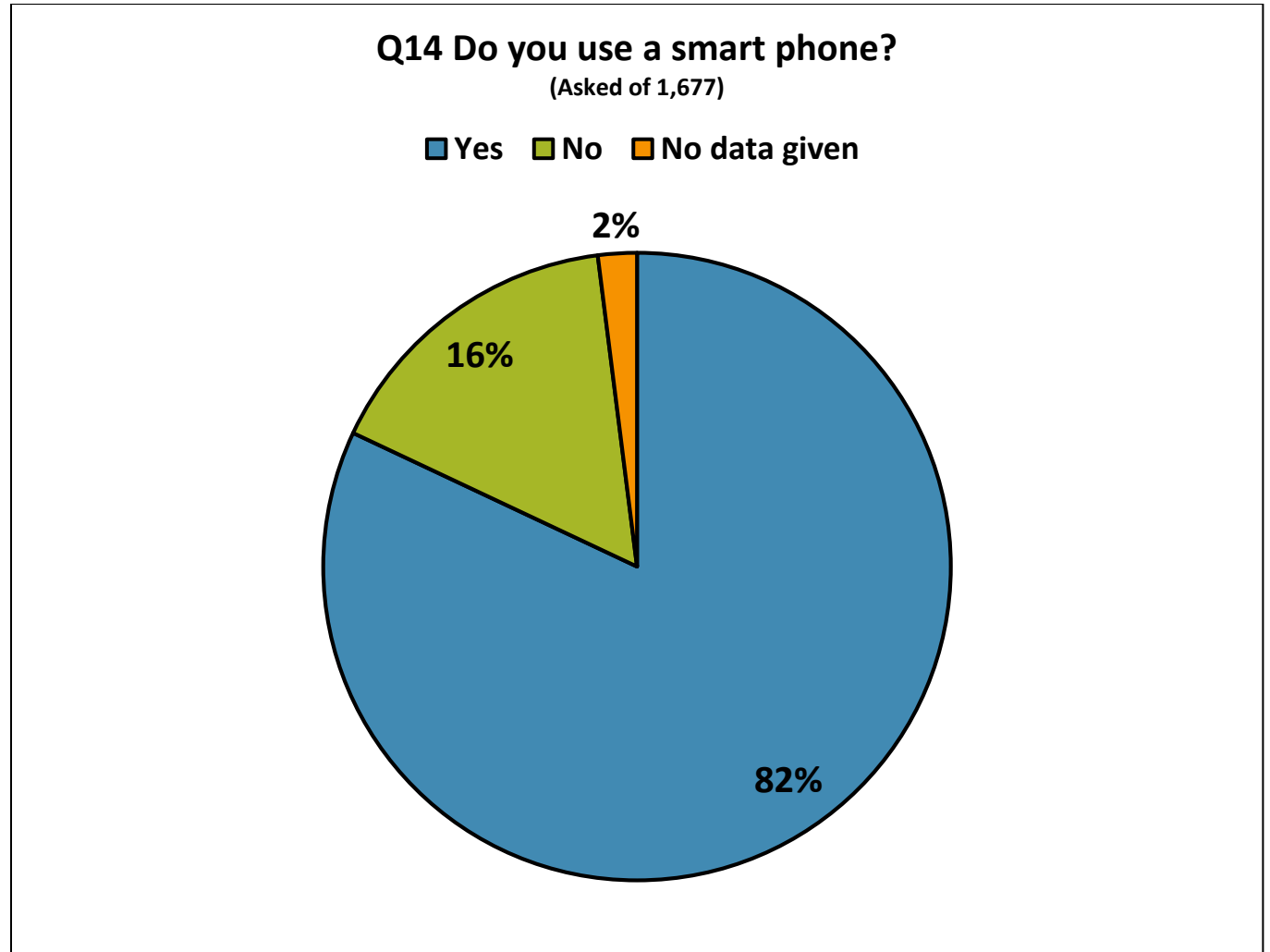
- Half of the 1298 who walked to the bus stop reported walked from between 1-5 minutes.
- An average developed by estimating the less than one minute and more than 15 minutes responses combined with using the mid-point of the three categories with a top and bottom of the range shows a “typical” walk time of 5.36 minutes.

# Q13 WHAT IS THE BEST WAY TO GET YOU INFORMATION ABOUT STA?



- Likelihood of preferring the Spokane Transit Website generally increased in step with household incomes but not to a noteworthy degree.
- Park & Ride users were significantly more likely than average to prefer the website and significantly less likely than average to prefer to Plaza and 328-RIDE.

# Q14 DO YOU USE A SMART PHONE?



- There was a slight correlation between smart phone users and higher than average household incomes. Bike riders and Park & Ride users were both significantly more likely than average to use a smart phone.
- Route 21 showed lower than average use of a smart phone.

**ATTACHMENT B LEP Service Providers Survey**



# Attachment B Survey Letter

October 17, 2019

Organization /Contact Person Name

Address

City, State, Zip

## **Spokane Transit Needs Your Input!**

We are in the process of updating our Title VI Plan. This plan guides our organization to ensure we do not discriminate on the basis of race, color, or national origin. We use this plan to review how we serve and engage minorities, low-income and limited English speaking individuals. You have been identified as a service provider for all or one of these groups. Please complete the survey to help us understand how to best communicate and serve these groups. The survey is due by October 31st.

There are three ways you can participate in the survey

1. Take the survey located at  
<https://www.surveymonkey.com/r/MMZ2PT7>
2. Fill out the attached paper survey and mail to,  
Mail: Tara Limon, Spokane Transit  
1230 West Boone  
Spokane, WA 99201
3. Fill out the attached paper copy then scan and email to,  
Email: [tlimon@spokanetransit.com](mailto:tlimon@spokanetransit.com)

Thank you for your help,  
Tara Limon  
Spokane Transit Authority  
(509) 343-1692

If you would like to review the current Title VI Plan please see our website here:

<https://www.spokanetransit.com/about-sta/title-vi-non-discrimination-policy>

### Non Discrimination Notice

In accordance with Title VI of the Civil Rights Act of 1964, Spokane Transit does not discriminate on the basis of race, color, or national origin. For more information on your rights or the procedures to file a discrimination complaint, or to request this information in an accessible format, please contact the STA Ombudsman at (509) 325-6094 (TTY Relay 711), or STA's Administrative Office, 1230 West Boone Avenue, Spokane, WA 99201.

- If information is needed in another language, contact (509) 325-6094.
- Si necesita información en otro idioma, comuníquese al (509) 325-6094.
- Для получения информации на другом языке звоните по тел. (509) 325-6094.
- Nếu quý vị cần thông tin bằng một ngôn ngữ khác, xin vui lòng gọi số (509) 325-6094.



## Spokane Transit Needs Your Input!

We are in the process of updating our Title VI Plan. This plan guides our organization to ensure we do not discriminate on the basis of race, color, or national origin. We use this plan to review how we serve and engage minorities, low-income and limited English speaking individuals. Please complete this survey to help us understand how to best communicate and serve these groups.

If you would like to review the current Title VI Plan please see our website here:

<https://www.spokanetransit.com/about-sta/title-vi-non-discrimination-policy>

### Non Discrimination Notice

In accordance with Title VI of the Civil Rights Act of 1964, Spokane Transit does not discriminate on the basis of race, color, or national origin. For more information on your rights or the procedures to file a discrimination complaint, or to request this information in an accessible format, please contact the STA Ombudsman at (509) 325-6094 (TTY Relay 711), or STA's Administrative Office, 1230 West Boone Avenue, Spokane, WA 99201.

- If information is needed in another language, contact (509) 325-6094.
- Si necesita información en otro idioma, comuníquese al (509) 325-6094.
- Для получения информации на другом языке звоните по тел. (509) 325-6094.
- Nếu quý vị cần thông tin bằng một ngôn ngữ khác, xin vui long gọi số (509) 325-6094.



1. Do you work for an organization that serves minority groups and/or limited or non-English speaking individuals?

Yes

No

2. About how many total clients do you serve each month?

- 0
- 1-10
- 10-20
- 20-50
- 50-100
- More than 100

3. Estimate how many clients per month are limited in their ability to speak or read English.

- 0
- 1-10
- 10-20
- 20-50
- 50-100
- More than 100

4. Estimate how many clients you serve per month that speak or read in the languages below.

	0	1-10	10-20	20-50	50-100	More than 100
Arabic	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Bosnian	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Burmese/Chin/Karen	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Chinese	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Farsi	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
French	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Kinyarwanda	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Kirundi	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Korean	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Marshallese	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Moldovan	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Nepali	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Russian	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Somali	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Spanish	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Swahili	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Thai	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ukrainian	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Vietnamese	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Did we miss any languages that you serve?

Please specify any additional languages and how many of your clients you serve per month that speak or read that language.

5. How much do your limited or non English speaking clients you serve rely on transit service?

- A lot
- A moderate amount
- A little
- None at all

6. Do your limited or non English speaking clients have trouble using transit?

Yes

No

If yes, please explain why or how we can make transit easier to use.

7. What locations in the area do limited or non English speaking individuals travel to and from the most often?

Downtown Spokane

South Spokane

Northwest Spokane

Northeast Spokane

Spokane Valley

Liberty Lake

Medical Lake

Cheney

Airway Heights

If we missed an area, please list what locations limited or non English speaking individuals travel to and from most often. This response can be as specific as a particular address or as general as grocery store, church, etc.

8. What are the best ways to communicate with limited or non English speaking individuals?

- Email
- Online Website
- Social Media
- Newspaper
- Radio Station
- In Person

What other methods have you identified to engage limited or non English speaking individuals?

9. Is there anything else you would like us to know about serving limited or non English speaking individuals?



10. Do you work for an organization that serves serves low-income individuals?

- Yes
- No

11. About how many clients do you serve per month?

- 0
- 1-10
- 10-20
- 20-50
- 50-100
- More than 100

12. Estimate how many clients you serve per month that are low income?

- 0
- 1-10
- 10-20
- 20-50
- 50-100
- More than 100

13. How much do your low income clients rely on transit service?

- A lot
- A moderate amount
- A little
- None at all

14. Do your low income clients have trouble using transit?

- Yes
- No

If yes, please explain why and how we can make transit easier for low income individuals to use?

15. What locations in the area do low income individuals travel to and from the most often?

- Downtown Spokane
- South Spokane
- Northwest Spokane
- Northeast Spokane
- Spokane Valley
- Liberty Lake
- Medical Lake
- Cheney
- Airway Heights

If we missed an area, please list what locations low income individuals travel to and from most often. This response can be as specific as a particular address or as general as grocery store, church, etc.

16. What are the best ways to communicate with low income individuals?

- Email
- Online Website
- Social Media
- Newspaper
- Radio Station
- In Person

What other methods have you identified to engage low income individuals?

17. Is there anything else you would like to tell us about serving low income individuals?





18. What is the best way for us to contact you?

We would use your contact information for Title VI purposes and public outreach opportunities related to our service and fares.

<b>Name</b>	<input type="text"/>
<b>Organization</b>	<input type="text"/>
<b>Address</b>	<input type="text"/>
<b>City/Town</b>	<input type="text"/>
<b>State/Province</b>	<input type="text"/>
<b>ZIP/Postal Code</b>	<input type="text"/>
<b>Email Address</b>	<input type="text"/>
<b>Phone Number</b>	<input type="text"/>

19. How can Spokane Transit best engage the people you serve to provide input on our planning efforts and provide feedback on proposed fare or service changes?

20. Is there anything else you would like to tell us?

21. Is there anyone else we should share this survey with?

Please list name, organization and email.

## **Thank you for taking this survey!**

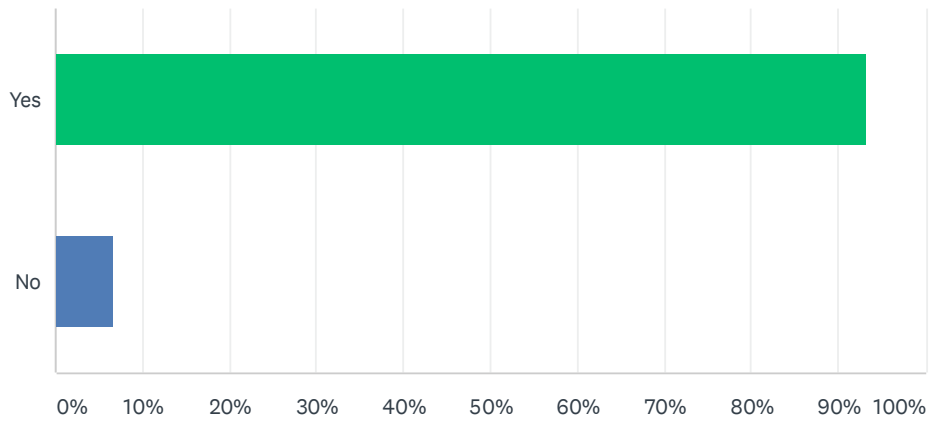
Are you interested in contributing more? Spokane Transit's Citizen Advisory Committee is looking for new members!

Please visit our website for more information,  
<https://www.spokanetransit.com/about-sta/citizen-advisory-committee>

## Attachment B Survey Results

Q1 Do you work for an organization that serves minority groups and/or limited or non-English speaking individuals?

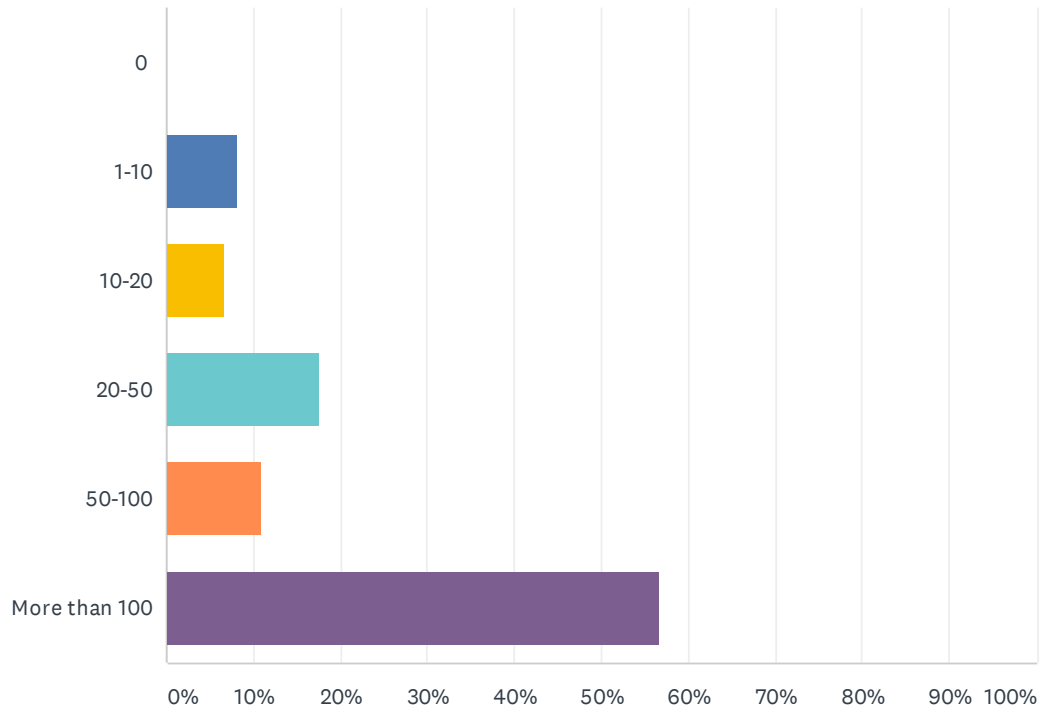
Answered: 75 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes	93.33%	70
No	6.67%	5
TOTAL		75

## Q2 About how many total clients do you serve each month?

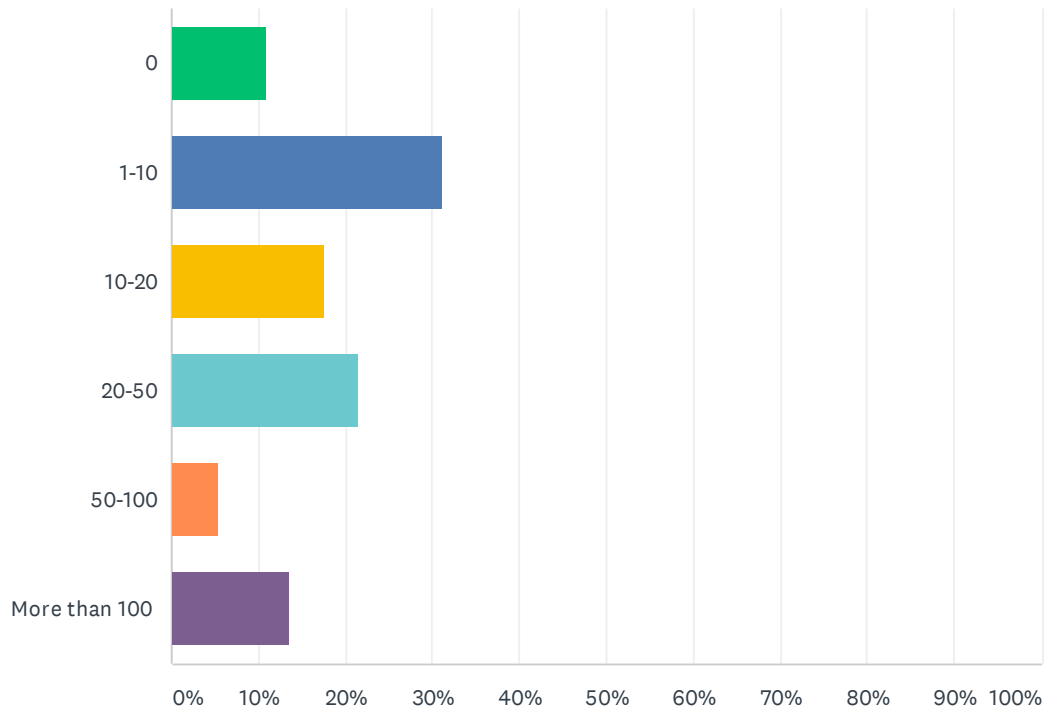
Answered: 74 Skipped: 2



ANSWER CHOICES	RESPONSES	
0	0.00%	0
1-10	8.11%	6
10-20	6.76%	5
20-50	17.57%	13
50-100	10.81%	8
More than 100	56.76%	42
<b>TOTAL</b>		<b>74</b>

### Q3 Estimate how many clients per month are limited in their ability to speak or read English.

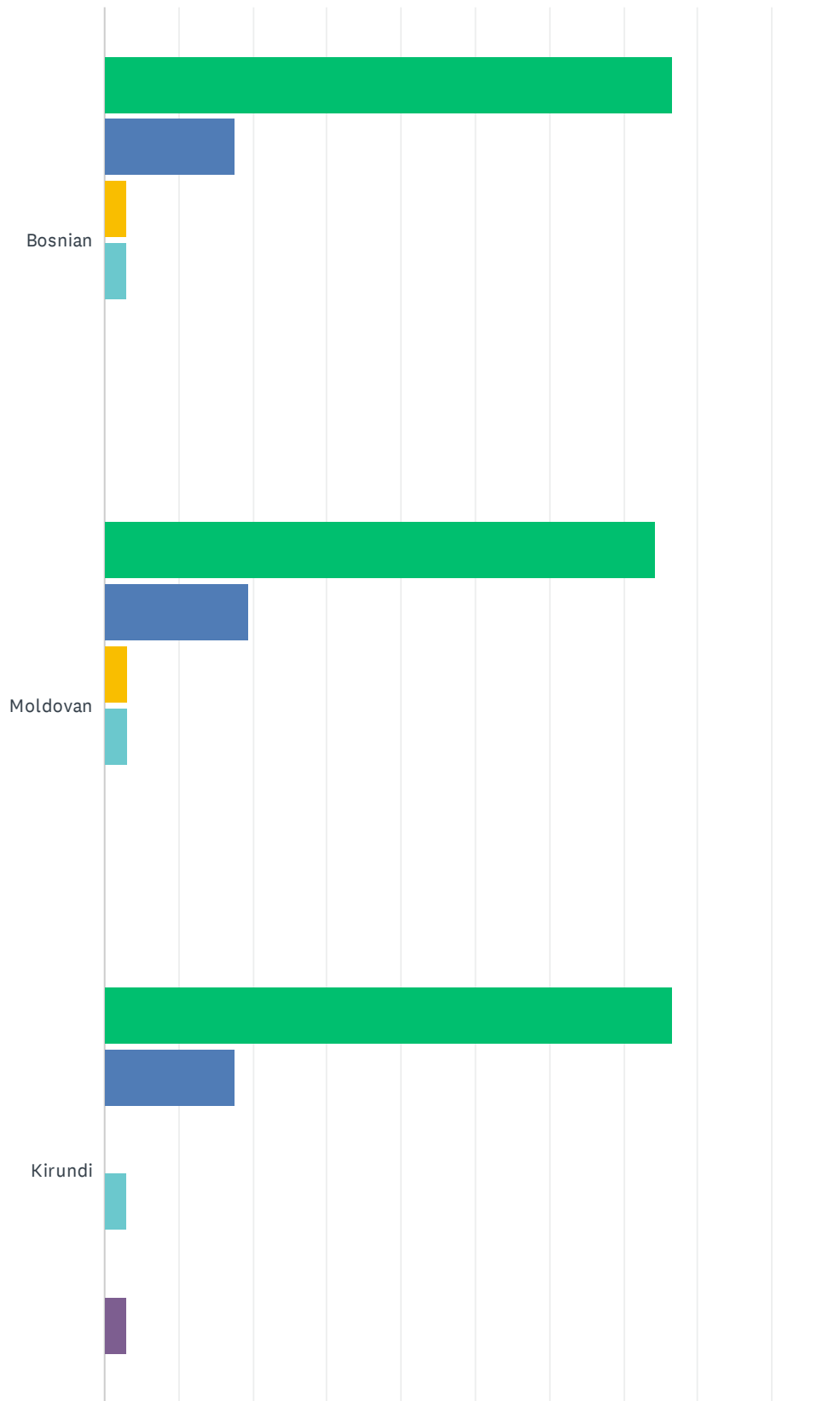
Answered: 74 Skipped: 2



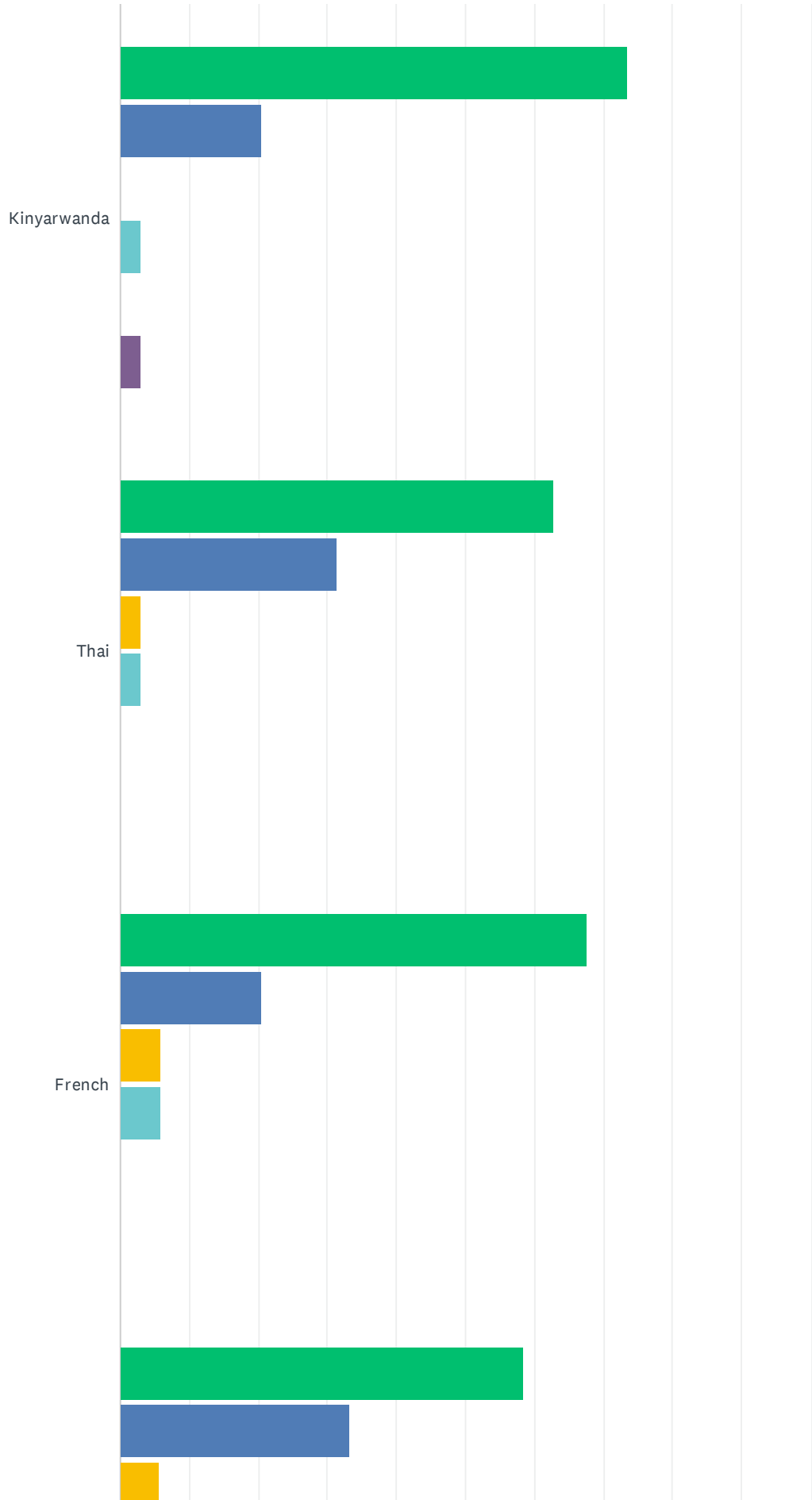
ANSWER CHOICES	RESPONSES	
0	10.81%	8
1-10	31.08%	23
10-20	17.57%	13
20-50	21.62%	16
50-100	5.41%	4
More than 100	13.51%	10
<b>TOTAL</b>		<b>74</b>

### Q4 Estimate how many clients you serve per month that speak or read in the languages below.

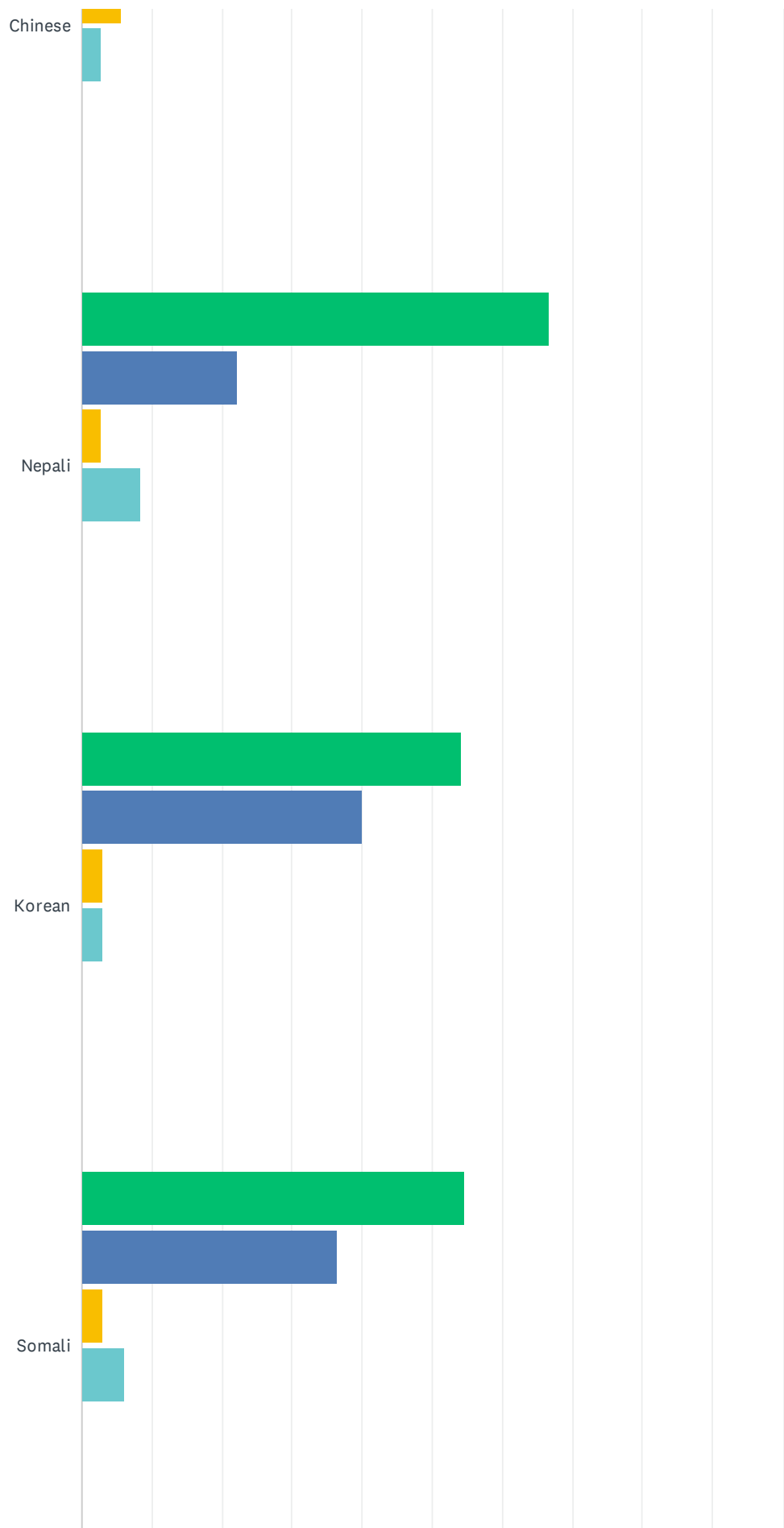
Answered: 66 Skipped: 10



# Title VI Survey - Service Providers

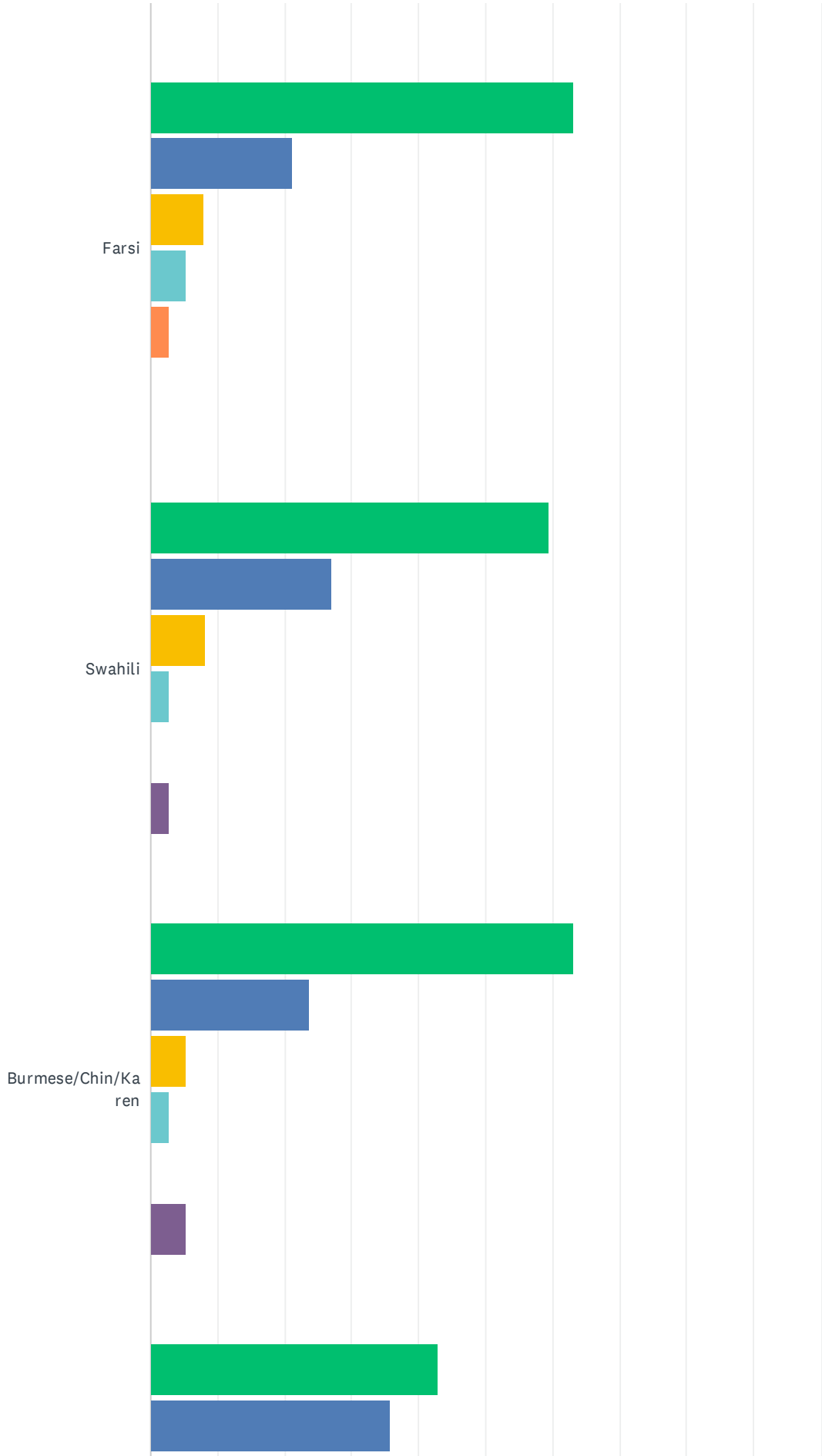


# Title VI Survey - Service Providers

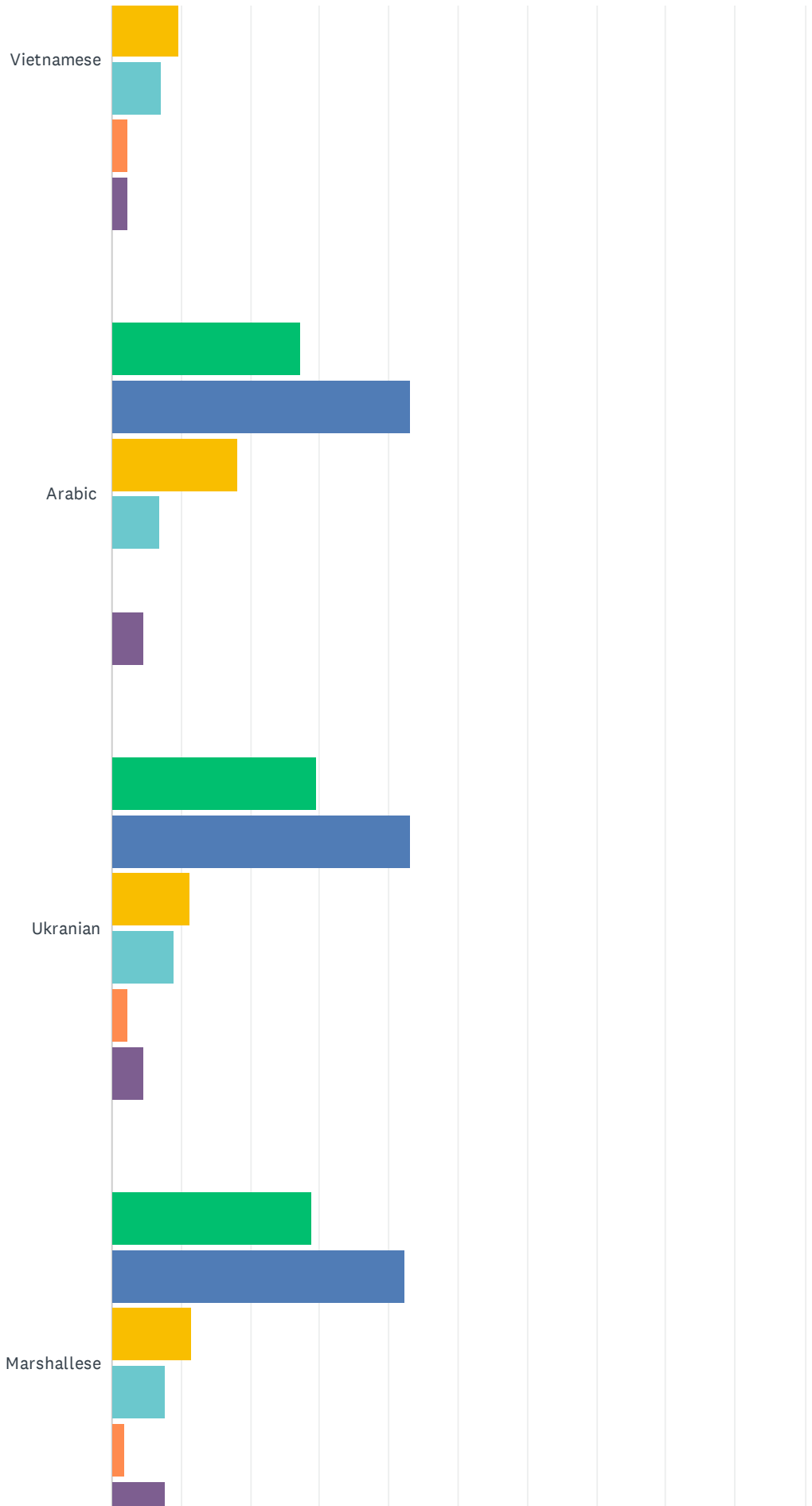




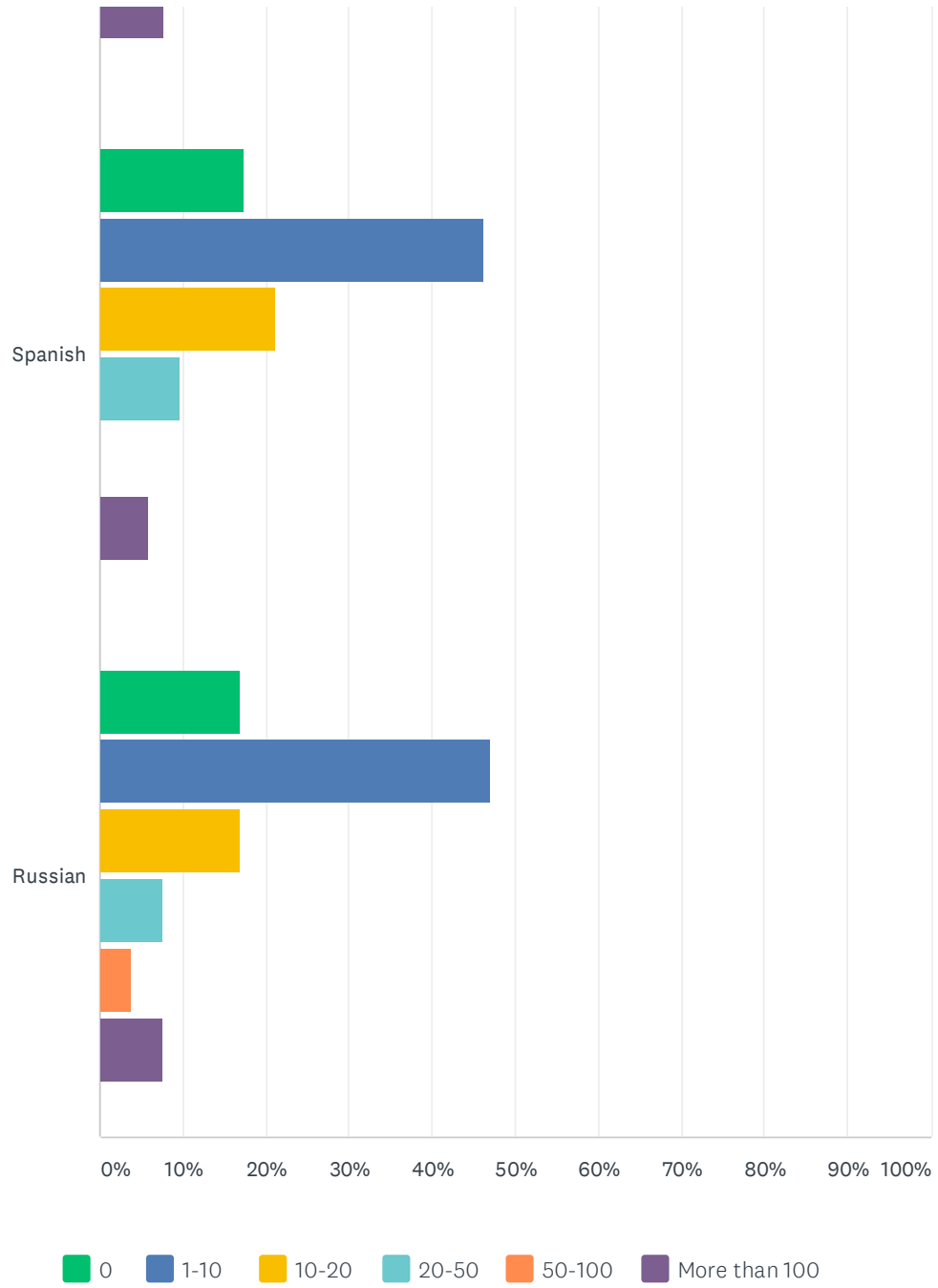
# Title VI Survey - Service Providers



# Title VI Survey - Service Providers



# Title VI Survey - Service Providers

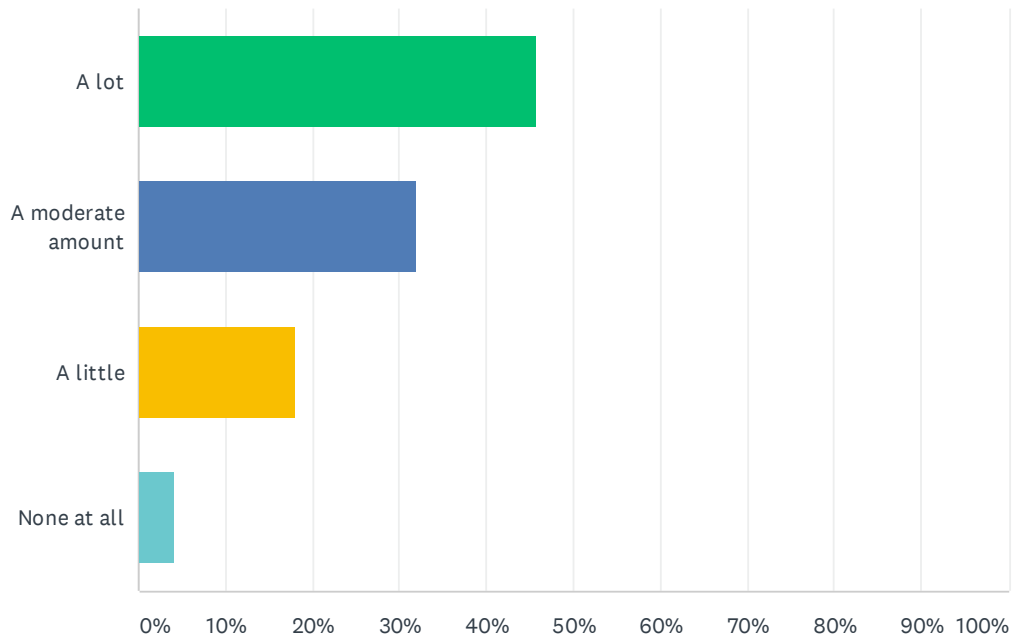


Title VI Survey - Service Providers

	0	1-10	10-20	20-50	50-100	MORE THAN 100	TOTAL	WEIGHTED AVERAGE
Bosnian	76.47% 26	17.65% 6	2.94% 1	2.94% 1	0.00% 0	0.00% 0	34	1.32
Moldovan	74.19% 23	19.35% 6	3.23% 1	3.23% 1	0.00% 0	0.00% 0	31	1.35
Kirundi	76.47% 26	17.65% 6	0.00% 0	2.94% 1	0.00% 0	2.94% 1	34	1.41
Kinyarwanda	73.53% 25	20.59% 7	0.00% 0	2.94% 1	0.00% 0	2.94% 1	34	1.44
Thai	62.86% 22	31.43% 11	2.86% 1	2.86% 1	0.00% 0	0.00% 0	35	1.46
French	67.65% 23	20.59% 7	5.88% 2	5.88% 2	0.00% 0	0.00% 0	34	1.50
Chinese	58.33% 21	33.33% 12	5.56% 2	2.78% 1	0.00% 0	0.00% 0	36	1.53
Nepali	66.67% 24	22.22% 8	2.78% 1	8.33% 3	0.00% 0	0.00% 0	36	1.53
Korean	54.29% 19	40.00% 14	2.86% 1	2.86% 1	0.00% 0	0.00% 0	35	1.54
Somali	54.55% 18	36.36% 12	3.03% 1	6.06% 2	0.00% 0	0.00% 0	33	1.61
Farsi	63.16% 24	21.05% 8	7.89% 3	5.26% 2	2.63% 1	0.00% 0	38	1.63
Swahili	59.46% 22	27.03% 10	8.11% 3	2.70% 1	0.00% 0	2.70% 1	37	1.65
Burmese/Chin/Karen	63.16% 24	23.68% 9	5.26% 2	2.63% 1	0.00% 0	5.26% 2	38	1.68
Vietnamese	42.86% 18	35.71% 15	9.52% 4	7.14% 3	2.38% 1	2.38% 1	42	1.98
Arabic	27.27% 12	43.18% 19	18.18% 8	6.82% 3	0.00% 0	4.55% 2	44	2.23
Ukranian	29.55% 13	43.18% 19	11.36% 5	9.09% 4	2.27% 1	4.55% 2	44	2.25
Marshallese	28.85% 15	42.31% 22	11.54% 6	7.69% 4	1.92% 1	7.69% 4	52	2.35
Spanish	17.31% 9	46.15% 24	21.15% 11	9.62% 5	0.00% 0	5.77% 3	52	2.46
Russian	16.98% 9	47.17% 25	16.98% 9	7.55% 4	3.77% 2	7.55% 4	53	2.57

## Q5 How much do your limited or non English speaking clients you serve rely on transit service?

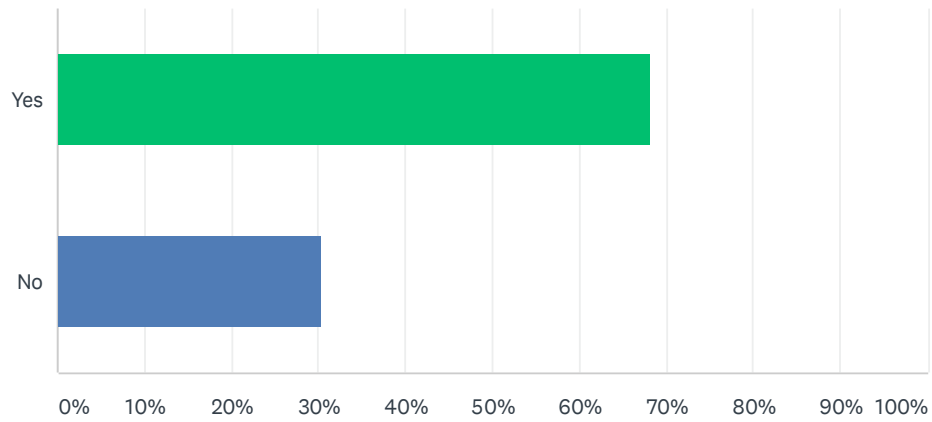
Answered: 72 Skipped: 4



ANSWER CHOICES	RESPONSES	
A lot	45.83%	33
A moderate amount	31.94%	23
A little	18.06%	13
None at all	4.17%	3
TOTAL		72

## Q6 Do your limited or non English speaking clients have trouble using transit?

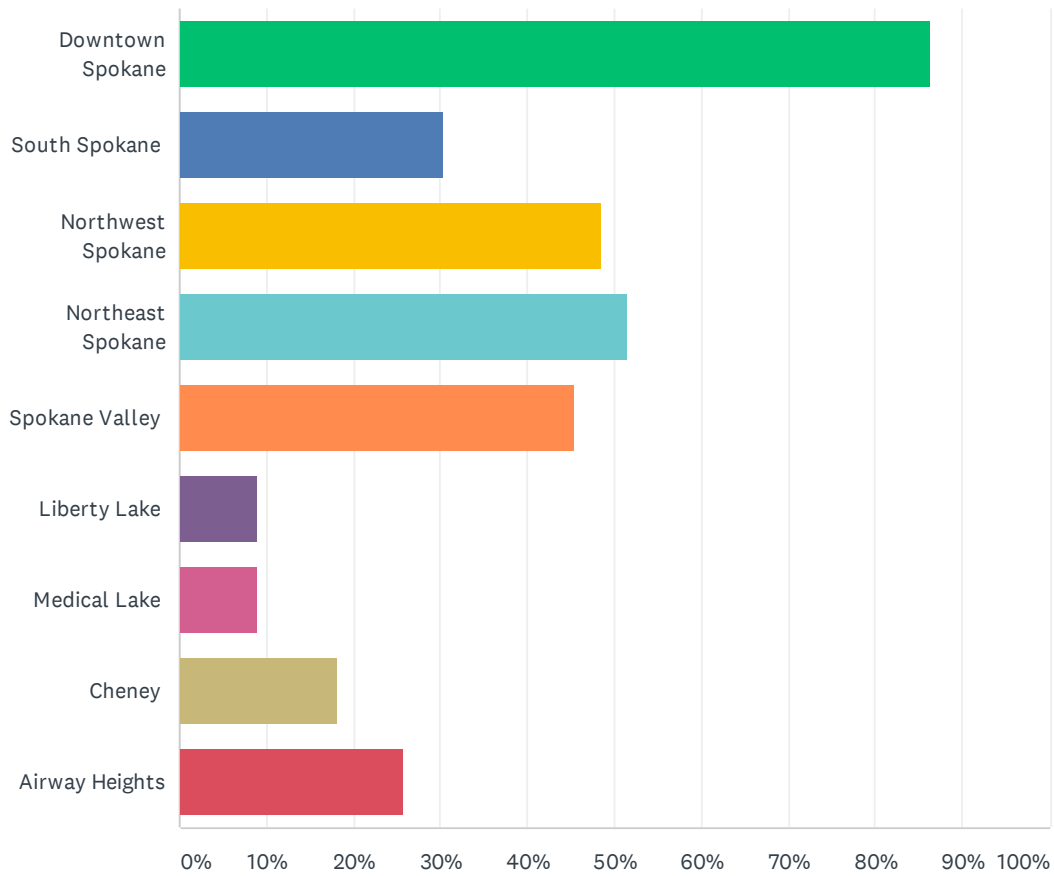
Answered: 69 Skipped: 7



ANSWER CHOICES	RESPONSES	
Yes	68.12%	47
No	30.43%	21
TOTAL		69

## Q7 What locations in the area do limited or non English speaking individuals travel to and from the most often?

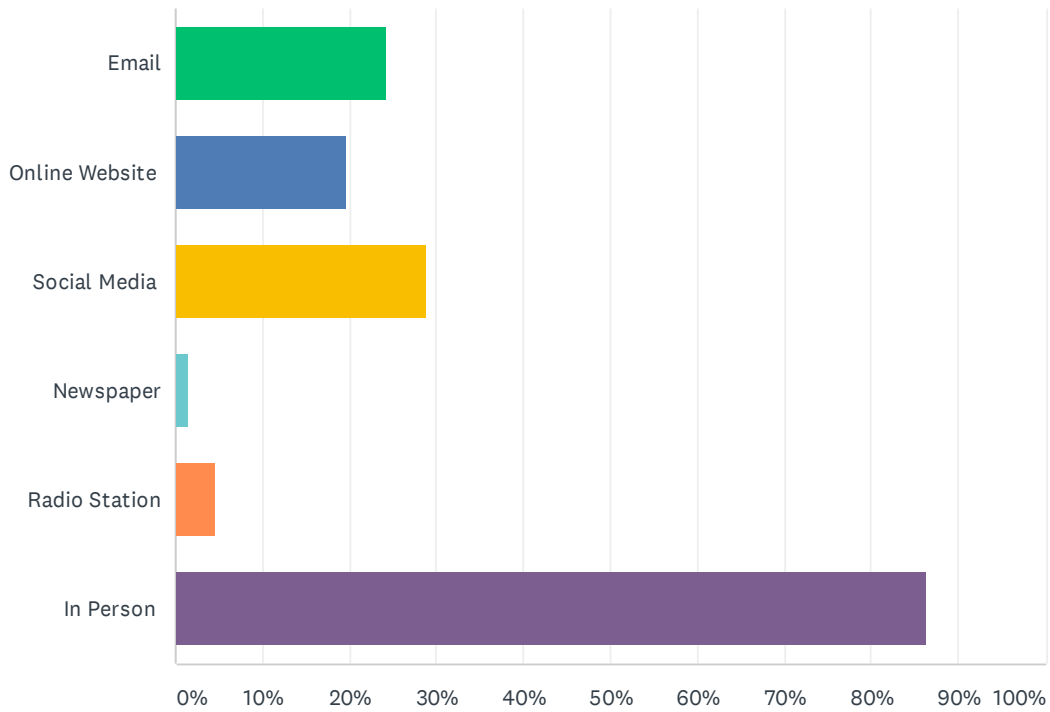
Answered: 66 Skipped: 10



ANSWER CHOICES	RESPONSES	
Downtown Spokane	86.36%	57
South Spokane	30.30%	20
Northwest Spokane	48.48%	32
Northeast Spokane	51.52%	34
Spokane Valley	45.45%	30
Liberty Lake	9.09%	6
Medical Lake	9.09%	6
Cheney	18.18%	12
Airway Heights	25.76%	17
Total Respondents: 66		

## Q8 What are the best ways to communicate with limited or non English speaking individuals?

Answered: 66 Skipped: 10



ANSWER CHOICES	RESPONSES	
Email	24.24%	16
Online Website	19.70%	13
Social Media	28.79%	19
Newspaper	1.52%	1
Radio Station	4.55%	3
In Person	86.36%	57
Total Respondents: 66		

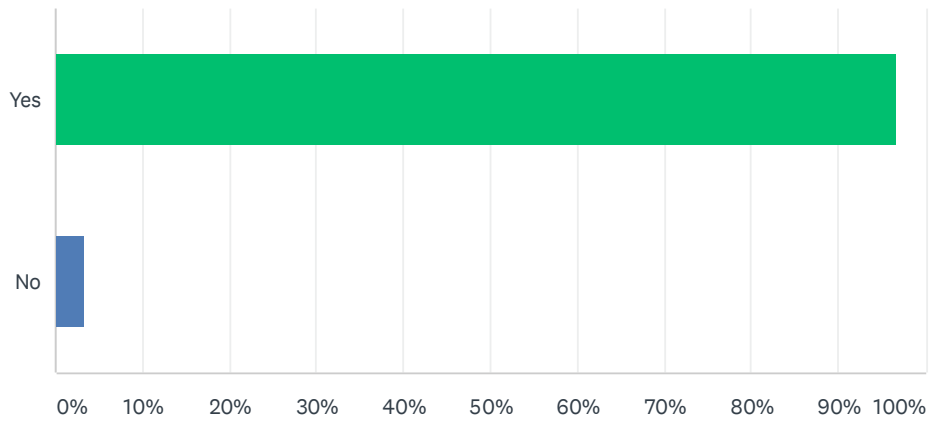


**Q9 Is there anything else you would like us to know about serving limited or non English speaking individuals?**

Answered: 22 Skipped: 54

## Q10 Do you work for an organization that serves serves low-income individuals?

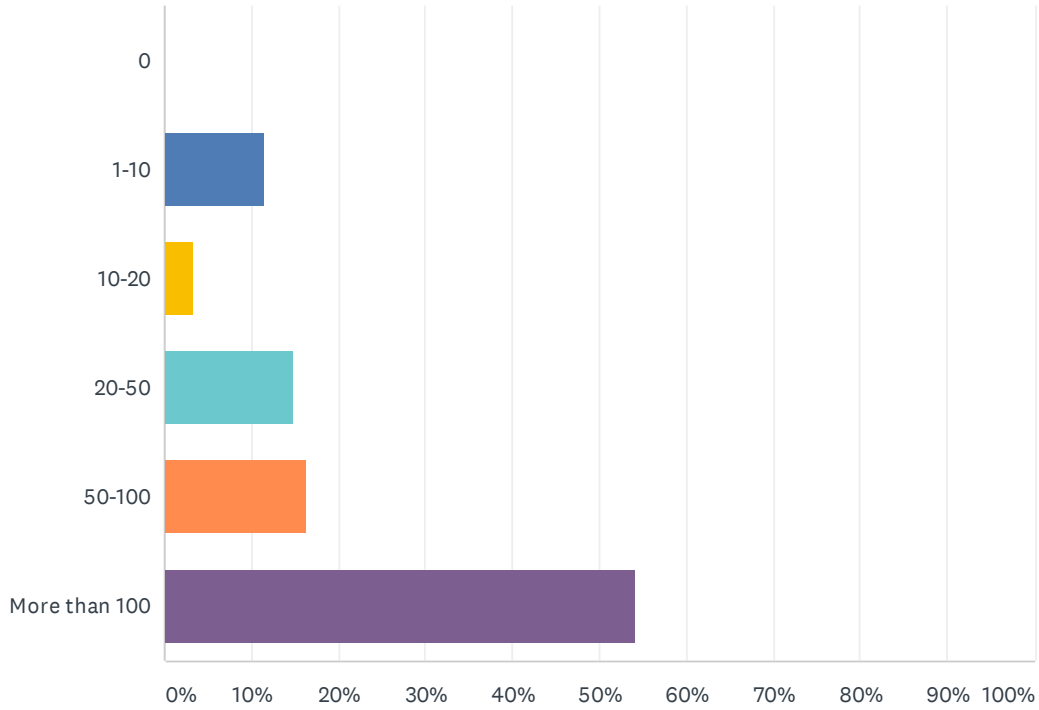
Answered: 61 Skipped: 15



ANSWER CHOICES	RESPONSES	
Yes	96.72%	59
No	3.28%	2
TOTAL		61

## Q11 About how many clients do you serve per month?

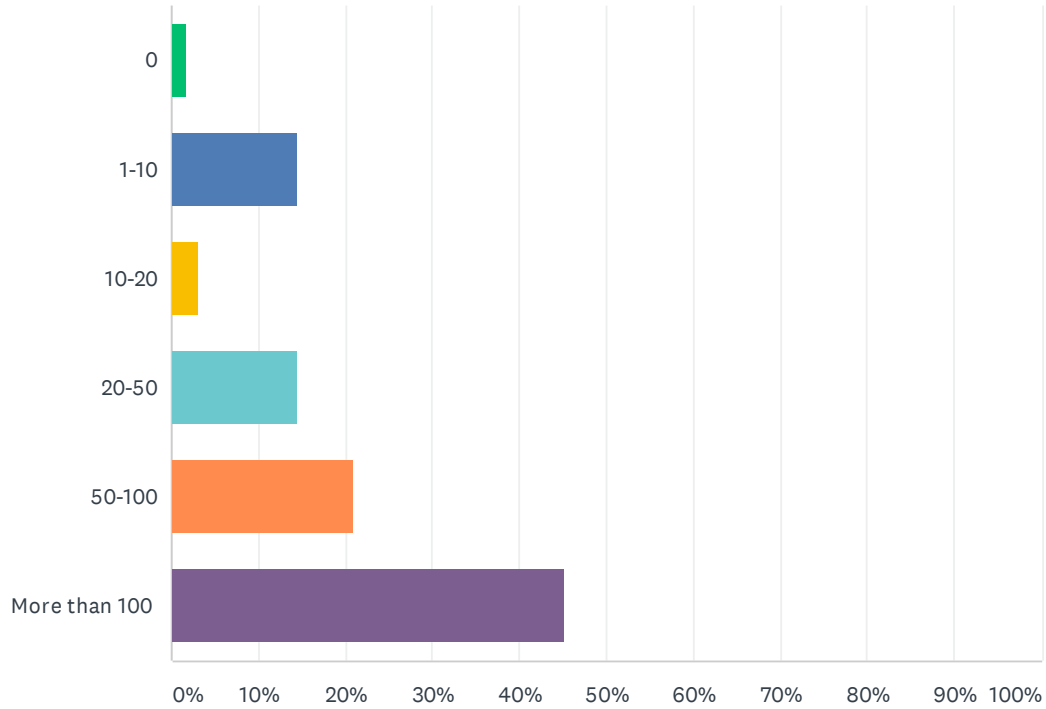
Answered: 61 Skipped: 15



ANSWER CHOICES	RESPONSES	
0	0.00%	0
1-10	11.48%	7
10-20	3.28%	2
20-50	14.75%	9
50-100	16.39%	10
More than 100	54.10%	33
<b>TOTAL</b>		<b>61</b>

## Q12 Estimate how many clients you serve per month that are low income?

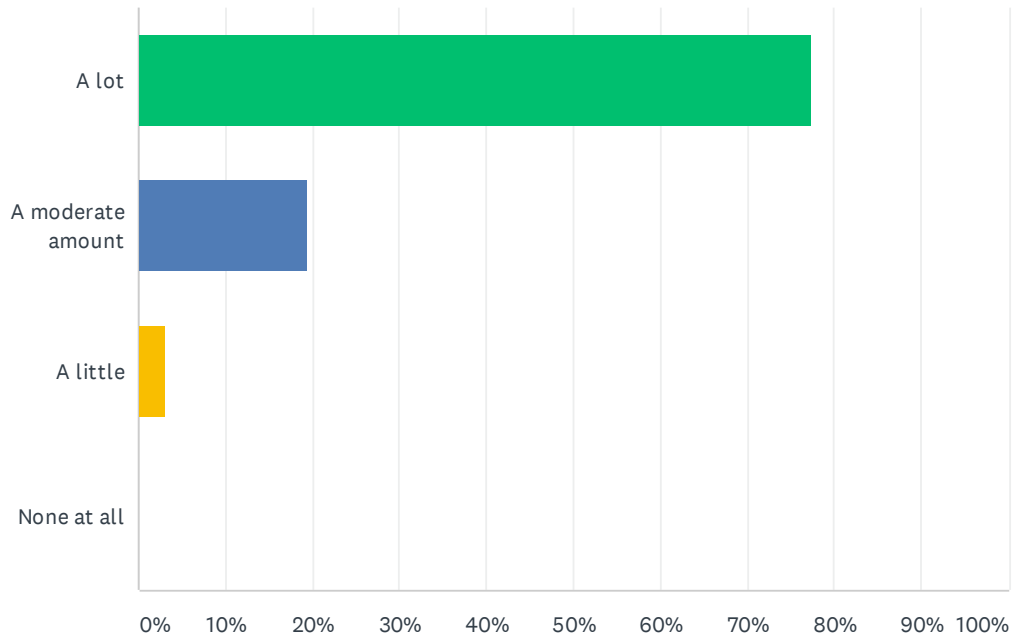
Answered: 62 Skipped: 14



ANSWER CHOICES	RESPONSES	
0	1.61%	1
1-10	14.52%	9
10-20	3.23%	2
20-50	14.52%	9
50-100	20.97%	13
More than 100	45.16%	28
<b>TOTAL</b>		<b>62</b>

### Q13 How much do your low income clients rely on transit service?

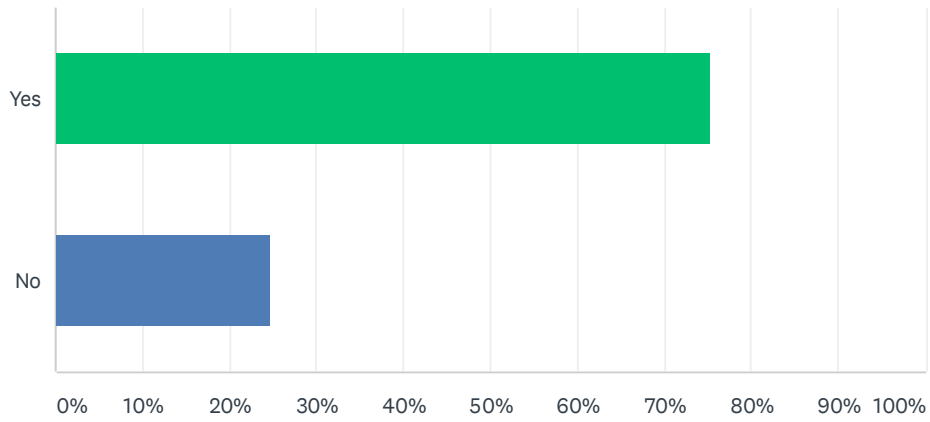
Answered: 62 Skipped: 14



ANSWER CHOICES	RESPONSES	
A lot	77.42%	48
A moderate amount	19.35%	12
A little	3.23%	2
None at all	0.00%	0
<b>TOTAL</b>		<b>62</b>

### Q14 Do your low income clients have trouble using transit?

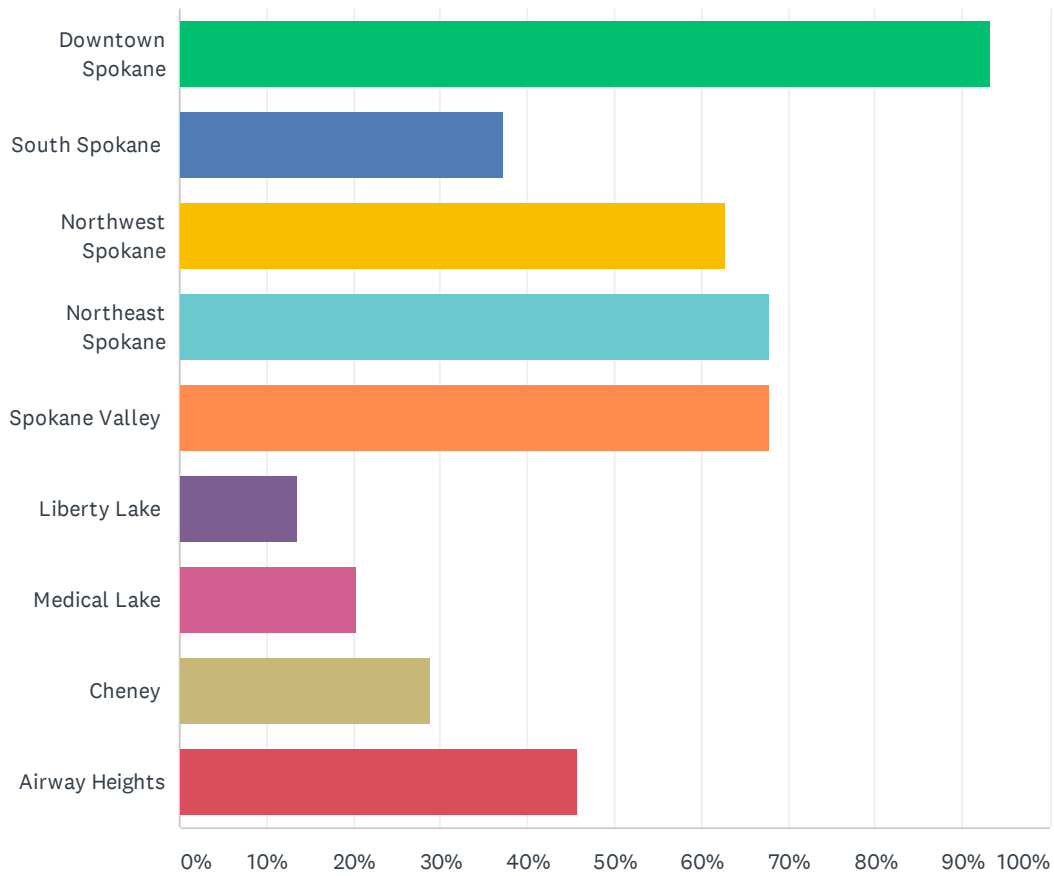
Answered: 61 Skipped: 15



ANSWER CHOICES	RESPONSES	
Yes	75.41%	46
No	24.59%	15
TOTAL		61

## Q15 What locations in the area do low income individuals travel to and from the most often?

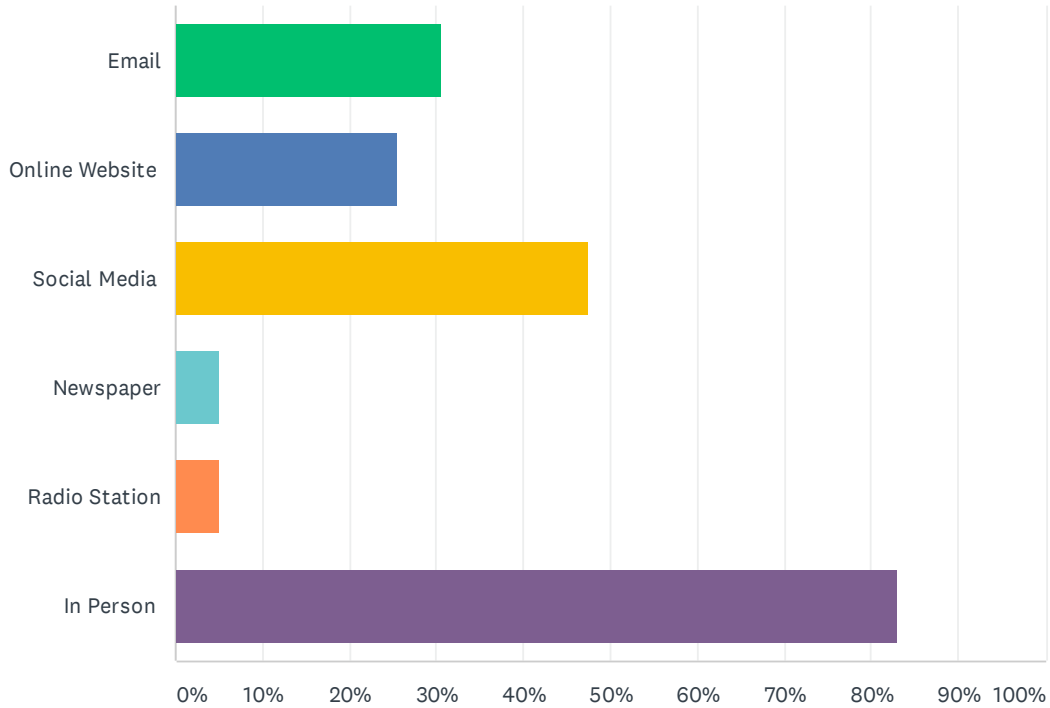
Answered: 59 Skipped: 17



ANSWER CHOICES	RESPONSES	
Downtown Spokane	93.22%	55
South Spokane	37.29%	22
Northwest Spokane	62.71%	37
Northeast Spokane	67.80%	40
Spokane Valley	67.80%	40
Liberty Lake	13.56%	8
Medical Lake	20.34%	12
Cheney	28.81%	17
Airway Heights	45.76%	27
Total Respondents: 59		

## Q16 What are the best ways to communicate with low income individuals?

Answered: 59 Skipped: 17



ANSWER CHOICES	RESPONSES	
Email	30.51%	18
Online Website	25.42%	15
Social Media	47.46%	28
Newspaper	5.08%	3
Radio Station	5.08%	3
In Person	83.05%	49
Total Respondents: 59		



**Q17 Is there anything else you would like to tell us about serving low income individuals?**

Answered: 16 Skipped: 60

**Q18 What is the best way for us to contact you?We would use your contact information for Title VI purposes and public outreach opportunities related to our service and fares.**

Answered: 46 Skipped: 30

ANSWER CHOICES	RESPONSES	
Name	93.48%	43
Organization	100.00%	46
Address	95.65%	44
Address 2	0.00%	0
City/Town	97.83%	45
State/Province	97.83%	45
ZIP/Postal Code	100.00%	46
Country	0.00%	0
Email Address	93.48%	43
Phone Number	93.48%	43

**Q19 How can Spokane Transit best engage the people you serve to provide input on our planning efforts and provide feedback on proposed fare or service changes?**

Answered: 40 Skipped: 36

## Q20 Is there anything else you would like to tell us?

Answered: 15 Skipped: 61

**Q21 Is there anyone else we should share this survey with?Please list name, organization and email.**

Answered: 11 Skipped: 65

**ATTACHMENT C Certifications and Assurances**

**FTA FISCAL YEAR 2019 CERTIFICATIONS AND ASSURANCES**

**FEDERAL FISCAL YEAR 2019 CERTIFICATIONS AND ASSURANCES FOR FTA ASSISTANCE PROGRAMS**

(Signature pages alternate to providing Certifications and Assurances in TrAMS.)

Name of Applicant: Spokane Transit

The Applicant certifies to the applicable provisions of categories 01–18. \_\_\_\_\_

*Or,*

The Applicant certifies to the applicable provisions of the categories it has selected:

<b>Category</b>	<b>Certification</b>
01 Certifications and Assurances Required of Every Applicant	<u>X</u>
02 Tax Liability and Felony Convictions	<u>X</u>
03 Lobbying	<u>X</u>
04 Private Sector Protections	<u>X</u>
05 Transit Asset Management Plan	<u>X</u>
06 Rolling Stock Buy America Reviews and Bus Testing	<u>X</u>
07 Urbanized Area Formula Grants Program	<u>X</u>
08 Formula Grants for Rural Areas	<u>X</u>
09 Fixed Guideway Capital Investment Grants and the Expedited Project Delivery for Capital Investment Grants Pilot Program	<u>X</u>
10 Grants for Buses and Bus Facilities and Low or No Emission Vehicle Deployment Grant Programs	<u>X</u>
11 Enhanced Mobility of Seniors and Individuals with Disabilities Programs	<u>X</u>
12 State of Good Repair Grants	<u>X</u>
13 Infrastructure Finance Programs	<u>  </u>
14 Alcohol and Controlled Substances Testing	<u>X</u>
15 Rail Safety Training and Oversight	<u>X</u>
16 Demand Responsive Service	<u>X</u>
17 Interest and Financing Costs	<u>X</u>
18 Construction Hiring Preferences	<u>X</u>

**FEDERAL FISCAL YEAR 2019 FTA CERTIFICATIONS AND ASSURANCES SIGNATURE**

**PAGE**

(Required of all Applicants for federal assistance to be awarded by FTA in FY 2019)

**AFFIRMATION OF APPLICANT**

Name of the Applicant: Spokane Transit

BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in federal fiscal year 2019, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it.

FTA intends that the Certifications and Assurances the Applicant selects on the other side of this document should apply to each Award for which it now seeks, or may later seek federal assistance to be awarded during federal fiscal year 2019.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 *et seq.*, and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

Signature E. Susan Meyer Date: 3-31-19

Name E. Susan Meyer, CEO Authorized Representative of Applicant

**AFFIRMATION OF APPLICANT'S ATTORNEY**

For (Name of Applicant): Spokane Transit

As the undersigned Attorney for the above-named Applicant, I hereby affirm to the Applicant that it has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it.

I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.

Signature Laura McAloon Date: 4/1/19

Name Laura McAloon Attorney for Applicant

*Each Applicant for federal assistance to be awarded by FTA must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its electronic signature in lieu of the Attorney's signature within TrAMS, provided the Applicant has on file and uploaded to TrAMS this hard-copy Affirmation, signed by the attorney and dated this federal fiscal year.*



**FTA FISCAL YEAR 2018 CERTIFICATIONS AND ASSURANCES**

**FEDERAL FISCAL YEAR 2018 CERTIFICATIONS AND ASSURANCES FOR  
FEDERAL TRANSIT ADMINISTRATION ASSISTANCE PROGRAMS**

(Signature pages alternative to providing Certifications and Assurances in TrAMS)

Name of Applicant: Spokane Transit Authority

The Applicant agrees to comply with applicable provisions of Categories 01 – 21. \_\_\_\_\_

OR

The Applicant agrees to comply with applicable provisions of the Categories it has selected:

<u>Category</u>	<u>Description</u>	
01.	Required Certifications and Assurances for Each Applicant.	<u>X</u>
02.	Lobbying.	<u>X</u>
03.	Private Sector Protections.	<u>X</u>
04.	Rolling Stock Reviews and Bus Testing.	<u>X</u>
05.	Demand Responsive Service.	<u>X</u>
06.	Intelligent Transportation Systems.	<u>X</u>
07.	Interest and Financing Costs and Acquisition of Capital Assets by Lease.	<u>X</u>
08.	Transit Asset Management Plan, Public Transportation Safety Program, and State Safety Oversight Requirements.	<u>X</u>
09.	Alcohol and Controlled Substances Testing.	<u>X</u>
10.	Fixed Guideway Capital Investment Grants Program (New Starts, Small Starts, and Core Capacity Improvement).	<u>X</u>
11.	State of Good Repair Program.	<u>X</u>
12.	Grants for Buses and Bus Facilities and Low or No Emission Vehicle Deployment Grant Programs.	<u>X</u>
13.	Urbanized Area Formula Grants Programs and Passenger Ferry Grant Program.	<u>X</u>
14.	Enhanced Mobility of Seniors and Individuals with Disabilities Programs.	<u>X</u>
15.	Rural Areas and Appalachian Development Programs.	
16.	Tribal Transit Programs (Public Transportation on Indian Reservations Programs).	
17.	State Safety Oversight Grant Program.	<u>X</u>
18.	Public Transportation Emergency Relief Program.	<u>X</u>
19.	Expedited Project Delivery Pilot Program.	<u>X</u>
20.	Infrastructure Finance Programs.	
21.	Construction Hiring Preferences.	<u>X</u>

**FTA FISCAL YEAR 2018 CERTIFICATIONS AND ASSURANCES**

**FEDERAL FISCAL YEAR 2018 FTA CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE**

(Required of all Applicants for federal assistance to be awarded by FTA in FY 2018)

**AFFIRMATION OF APPLICANT**

Name of the Applicant: \_\_\_\_\_

Name and Relationship of the Authorized Representative: \_\_\_\_\_

BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in federal fiscal year 2018, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it.

FTA intends that the Certifications and Assurances the Applicant selects on the other side of this document should apply to each Award for which it now seeks, or may later seek federal assistance to be awarded during federal fiscal year 2018.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 *et seq.*, and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

Signature E. Susan Mejer Date: 2-26-18  
Name E. Susan Mejer, Chief Executive Officer  
Authorized Representative of Applicant

**AFFIRMATION OF APPLICANT'S ATTORNEY**

For (Name of Applicant): Spokane Transit Authority

As the undersigned Attorney for the above-named Applicant, I hereby affirm to the Applicant that it has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it.

I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.

Signature Walter D. McAtoon Date: 2-26-18  
Name Walter D. McAtoon  
Attorney for Applicant

*Each Applicant for federal assistance to be awarded by FTA must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its electronic signature in lieu of the Attorney's signature within TrAMS, provided the Applicant has on file and uploaded to TrAMS this hard-copy Affirmation, signed by the attorney and dated this federal fiscal year.*

**FTA FISCAL YEAR 2017 CERTIFICATIONS AND ASSURANCES**

**FEDERAL FISCAL YEAR 2017 CERTIFICATIONS AND ASSURANCES FOR  
FEDERAL TRANSIT ADMINISTRATION ASSISTANCE PROGRAMS**

(Signature pages alternative to providing Certifications and Assurances in TrAMS)

Name of Applicant: Spokane Transit Authority

The Applicant agrees to comply with applicable provisions of (Categories 01 – 23.  **OR**

The Applicant agrees to comply with applicable provisions of the Categories it has selected:

<u>Category</u>	<u>Description</u>	
01.	Required Certifications and Assurances for Each Applicant.	_____
02.	Lobbying.	_____
03.	Procurement and Procurement Systems.	_____
04.	Private Sector Protections.	_____
05.	Rolling Stock Reviews and Bus Testing.	_____
06.	Demand Responsive Service.	_____
07.	Intelligent Transportation Systems.	_____
08.	Interest and Financing Costs and Acquisition of Capital Assets by Lease.	_____
09.	Transit Asset Management Plan, Public Transportation Safety Program, and State Safety Oversight Requirements.	_____
10.	Alcohol and Controlled Substances Testing.	_____
11.	Fixed Guideway Capital Investment Grants Program (New Starts, Small Starts, and Core Capacity Improvement).	_____
12.	State of Good Repair Program.	_____
13.	Grants for Buses and Bus Facilities and Low or No Emission Vehicle Deployment Grant Programs.	_____
14.	Urbanized Area Formula Grants Programs and Passenger Ferry Grant Program.	_____
15.	Enhanced Mobility of Seniors and Individuals with Disabilities Programs.	_____
16.	Rural Areas and Appalachian Development Programs.	_____
17.	Tribal Transit Programs (Public Transportation on Indian Reservations Programs).	_____
18.	State Safety Oversight Grant Program.	_____
19.	Public Transportation Emergency Relief Program.	_____
20.	Expedited Project Delivery Pilot Program.	_____
21.	Infrastructure Finance Programs.	_____
22.	Paul S. Sarbanes Transit in Parks Program.	_____
23.	Construction Hiring Preferences.	_____

FTA FISCAL YEAR 2017 CERTIFICATIONS AND ASSURANCES

FEDERAL FISCAL YEAR 2017 FTA CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE

(Required of all Applicants for federal assistance to be awarded by FTA and all FTA Grantees with an active Capital or Formula Award)

AFFIRMATION OF APPLICANT

Name of the Applicant: Spokane Transit Authority

Name and Relationship of the Authorized Representative: Chief Executive Officer

BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in federal fiscal year 2017, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it.

FTA intends that the Certifications and Assurances the Applicant selects on the other side of this document should apply to each Award for which it now seeks, or may later seek federal assistance to be awarded during federal fiscal year 2017.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 et seq., and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

Signature E. Susan Meyer Date: 1.3.17

Name E. SUSAN Meyer, CEO Authorized Representative of Applicant

AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): Spokane Transit Authority

As the undersigned Attorney for the above named Applicant, I hereby affirm to the Applicant that it has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it.

I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.

Signature Laura McAloon Date: 1-5-17

Name Laura McAloon Attorney for Applicant

Each Applicant for federal assistance to be awarded by FTA and each FTA Recipient with an active Capital or Formula Project or Award must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its electronic signature in lieu of the Attorney's signature within FTA's electronic award and management system, provided the Applicant has on file and uploaded to FTA's electronic award and management system this hard-copy Affirmation, signed by the attorney and dated this federal fiscal year.

**ATTACHMENT D Board of Directors Resolution**

RESOLUTION NO. 776-20

A RESOLUTION FOR THE PURPOSE OF ADOPTING THE 2020 TITLE VI PROGRAM; AND  
OTHER MATTERS PROPERLY RELATING THERETO.

SPOKANE TRANSIT AUTHORITY  
Spokane County, Washington

BE IT RESOLVED BY THE SPOKANE TRANSIT AUTHORITY as follows:

WHEREAS, the Spokane Transit Authority (STA) is a municipal corporation operating and existing under and pursuant to the Constitution and Laws of the State of Washington, including RCW Title 36, Chapter 57A, Public Transportation Benefit Area; and,

WHEREAS, Section 601 of the Civil Rights Act of 1964 states: "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance"; and,

WHEREAS, Title VI prohibits recipients of federal financial assistance from discriminating on the basis of race, color or national origin; and,

WHEREAS, Executive Order 12898 requires agencies to identify and address effects of its programs, policies, and activities on minorities and low-income populations; and,

WHEREAS, the Federal Transit Administration (FTA) Circular FTA C 4702.1B, requires the Spokane Transit Board of Directors to adopt a Title VI Program and to update said program every three years; and,

WHEREAS, the STA Board of Directors conducted a duly noticed public hearing on its Title VI program on February 20, 2020; and,


WHEREAS, the STA Board of Directors considered and approved the major service change policy, disparate impact policy and disproportionate burden policy; and,

WHEREAS, the STA Board of Directors considered and approved the Fixed-route System-wide Service Standards and Policies, and the results from the monitoring results.

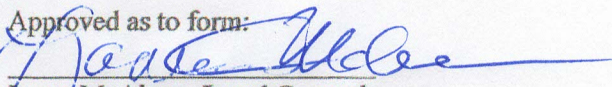
NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of STA as follows:

- Section 1. The STA Board of Directors hereby adopts the 2020 Title VI Program attached hereto as Exhibit 'A' and incorporated herein by reference.
- Section 2. The STA Board of Directors hereby authorizes the Chief Executive Officer to administer the 2020 Title VI program.
- Section 3. This resolution shall take effect and be in force immediately upon passage.

ADOPTED by STA at a meeting thereof held on the 19th day of March 2020.

ATTEST:  
  
Dana Infalt, Clerk of the Authority

SPOKANE TRANSIT AUTHORITY.  
 chair pro temp  
Al French, STA Board Chair

Approved as to form:  
  
Laura McAloon, Legal Counsel

RESOLUTION NO. 776-20

A RESOLUTION FOR THE PURPOSE OF ADOPTING THE 2020 TITLE VI PROGRAM; AND OTHER MATTERS PROPERLY RELATING THERETO.

SPOKANE TRANSIT AUTHORITY  
Spokane County, Washington

BE IT RESOLVED BY THE SPOKANE TRANSIT AUTHORITY as follows:

WHEREAS, the Spokane Transit Authority (STA) is a municipal corporation operating and existing under and pursuant to the Constitution and Laws of the State of Washington, including RCW Title 36, Chapter 57A, Public Transportation Benefit Area; and,

WHEREAS, Section 601 of the Civil Rights Act of 1964 states: "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance"; and,

WHEREAS, Title VI prohibits recipients of federal financial assistance from discriminating on the basis of race, color or national origin; and,

WHEREAS, Executive Order 12898 requires agencies to identify and address effects of its programs, policies, and activities on minorities and low-income populations; and,

WHEREAS, the Federal Transit Administration (FTA) Circular FTA C 4702.1B, requires the Spokane Transit Board of Directors to adopt a Title VI Program and to update said program every three years; and,

WHEREAS, the STA Board of Directors conducted a duly noticed public hearing on its Title VI program on February 20, 2020; and,

WHEREAS, the STA Board of Directors considered and approved the major service change policy, disparate impact policy and disproportionate burden policy; and,

WHEREAS, the STA Board of Directors considered and approved the Fixed-route System-wide Service Standards and Policies, and the results from the monitoring results.

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of STA as follows:

- Section 1. The STA Board of Directors hereby adopts the 2020 Title VI Program attached hereto as Exhibit 'A' and incorporated herein by reference.
- Section 2. The STA Board of Directors hereby authorizes the Chief Executive Officer to administer the 2020 Title VI program.
- Section 3. This resolution shall take effect and be in force immediately upon passage.

ADOPTED by STA at a meeting thereof held on the 19th day of March 2020.

ATTEST:  
  
Dana Infalt, Clerk of the Authority

SPOKANE TRANSIT AUTHORITY.  
 chair pro temp  
Al French, STA Board Chair

Approved as to form:  
  
Laura McAloon, Legal Counsel