



Spokane Transit

TITLE VI PROGRAM 2026-2029

Final Draft: November 25, 2025



Spokane Transit assures nondiscrimination in accordance with Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act. For more information, see www.spokanetransit.com. Upon request, alternative formats of this information will be produced for people who are disabled. Please call (509) 325-6094 (TTY Relay 711) or email ombudsman@spokanetransit.com.

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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, in public areas including the Spokane Transit Plaza, and at the reception area of STA's main facility. The public notice describes one's rights under Title VI. It contains information on how to seek information in another language and is translated into the Limited English Proficiency (LEP) safe harbor languages (Spanish, Russian, Vietnamese, Ukrainian, Marshallese, and Arabic). The contents of the notice, also translated into above identified languages, are as follows:

Non-Discrimination Notice

Title VI of the Civil Rights Act of 1964 states 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 receiving Federal financial assistance."

Spokane Transit Authority (STA) does not discriminate in the provision of service on the basis of race, color, or national origin. Any person who believes STA has discriminated against him or her on the basis of race, color, or national origin may file a complaint using form linked below.

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.

Щоб отримати інформацію іншою мовою, зателефонуйте за номером (509) 325-6094.

Elañe mejeje ej aikuj ilo juon bar kajin, kerpāke (509) 325-6094.

الرقم مع فتواصل أخرى، بلغة المعلومات إلى احتجت إذا (509) 325-6094.

Title VI Complaint Procedures

Title VI of the Civil Rights Act of 1964 states 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 receiving Federal financial assistance."

STA does not discriminate in the provision of service on the basis of race, color, or national origin. Any person who believes STA has discriminated against him or her on the basis of race, color, or national origin may file a complaint using form linked below. STA does not investigate complaints received more than 180 days after the alleged incident and will only process complaints that are complete.

Within 15 business days of receiving the completed complaint form, STA will acknowledge receipt of the complaint in writing (either letter or email). An STA investigator may request that the complainant provide additional information. The complainant has 15 business days from the date of STA's response to send the requested information to the investigator. If the investigator does not receive the additional information or is not contacted by the complainant within 15 business days, STA can administratively

close the complaint. A complaint can also be administratively closed if the complainant no longer wishes to pursue it. The STA investigator will send a final letter of resolution to the complainant when the investigation is complete.

If a citizen wants more information on STA's commitment to nondiscrimination, or requires a copy of the Title VI Complaint Form in an alternative format due to a disability, they can contact the STA Ombudsman:

Ombudsman & Accessibility Officer
1230 West Boone Avenue Spokane, WA 99201
(509) 325-6094
TTY Relay 711
ombudsman@spokanetransit.com

Title VI Complaint Form

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by an STA employee may file a Title VI complaint by completing and submitting the official Title VI Complaint Form provided on STA's website.

Complaint forms in English, as well as the six identified languages (Spanish, Russian, Vietnamese, Ukrainian, Marshallese, and Arabic) are available upon request or online at:

<https://www.spokanetransit.com/projects/title-vi-non-discrimination-policy-and-program/>

English: https://www.spokanetransit.com/wp-content/uploads/2023/08/20230815-Title-VI-Complaint-Form_English.pdf

Spanish: https://www.spokanetransit.com/wp-content/uploads/2023/08/20230815-Title-VI-Complaint-Form_Spanish.pdf

Russian: https://www.spokanetransit.com/wp-content/uploads/2023/08/20230815-Title-VI-Complaint-Form_Russian.pdf

Vietnamese: https://www.spokanetransit.com/wp-content/uploads/2023/08/20230815-Title-VI-Complaint-Form_Vietnamese.pdf

Ukrainian: https://www.spokanetransit.com/wp-content/uploads/2025/10/Title-VI-Complaint-Form_Ukrainian.pdf

Marshallese: https://www.spokanetransit.com/wp-content/uploads/2025/10/en_mh_Title-VI-Complaint-Form_Marshallese.pdf

Arabic: https://www.spokanetransit.com/wp-content/uploads/2023/08/20230815-Title-VI-Complaint-Form_Arabic.pdf

Copies of the complaint forms can also be found in Appendix A.

Section 3: Record of Title VI Investigations, Complaints, and Lawsuits

Based on 49 CFR Section 21.9(b), FTA requires all transit agencies to prepare and maintain a list of Title VI investigations, complaints, and lawsuits. Spokane Transit did not receive any Title VI complaints for 2023 – 2025.

Section 4: Collection of Demographic Data

Overview

The following section is a demographic analysis of the population within STA’s Public Transportation Benefit Area (PTBA) using 2020 Census data. 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 once every two years.

The service area defined for STA’s Title VI Program 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. To better understand the population within STA’s PTBA, data was collected using U.S. Block Groups partially or completely within the PTBA boundary. Block Groups are statistical divisions of census tracts that contain between 600 and 3,000 people.

The following data for minority populations was collected from the 2019-2023 American Community Survey (ACS) 5-year period estimates. In this report, “low-income” refers to people who are identified as living in poverty by the US Census Bureau. An individual’s federal poverty status is determined based on his or her annual household income and number of people in his or her household. The Federal Poverty Thresholds for 2023 consider an individual living alone under age 65 as living below the poverty line if he/she makes less than \$14,580 a year. Likewise, in a family of four with two children under 18, the household would have to make less than \$30,000 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 1 summarizes the minority and low-income populations of all the block groups within STA’s PTBA, based on data from the 2023 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.

Table 1: Minority and Low-Income Population Summary

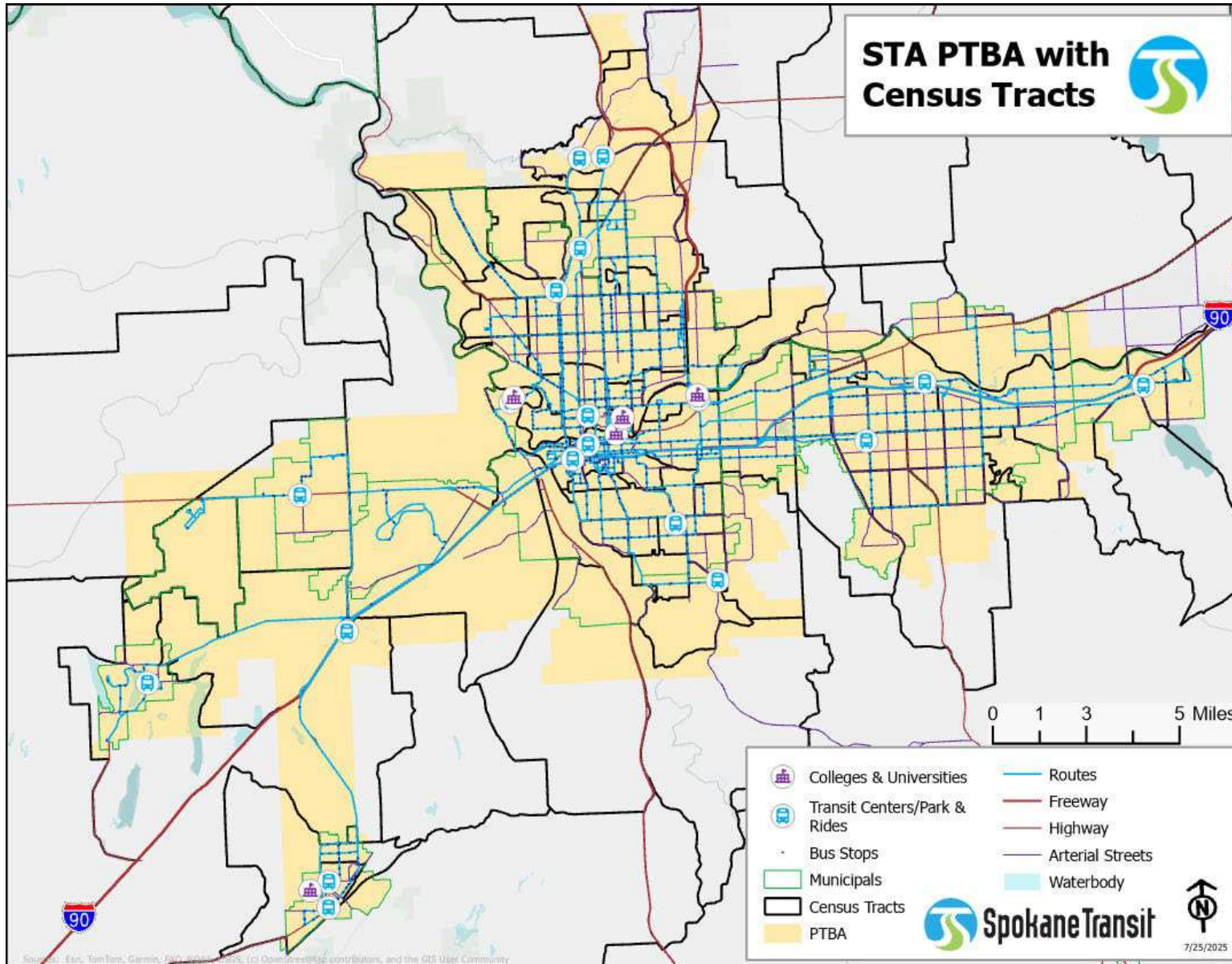
Description	Estimates
2024 OFM PTBA Population Estimate*	475,470
Census Estimate of PTBA Population (Race)**	508,219
Census Estimate of PTBA Minority Population**	83,595
Estimate Percent Minority residing within PTBA	16.4%
Census Estimate of PTBA Population (Poverty Level) ***	494,402
Census Estimate of Low-Income Population***	61,590
Estimate Percent Low-Income residing within PTBA	12.5%

* Source: Washington State Office of Financial Management (OFM), Forecasting and Research Division

** Table B02001. Race, American Community Survey 2019-2023

*** Table B17021. Poverty Status, American Community Survey 2019-2023

Map 1: STA PTBA within Census Tracts



Source: U.S. Census Bureau 2019-2023 American Community Survey 5-Year Estimates
Final Draft

Use of The Demographic Analysis

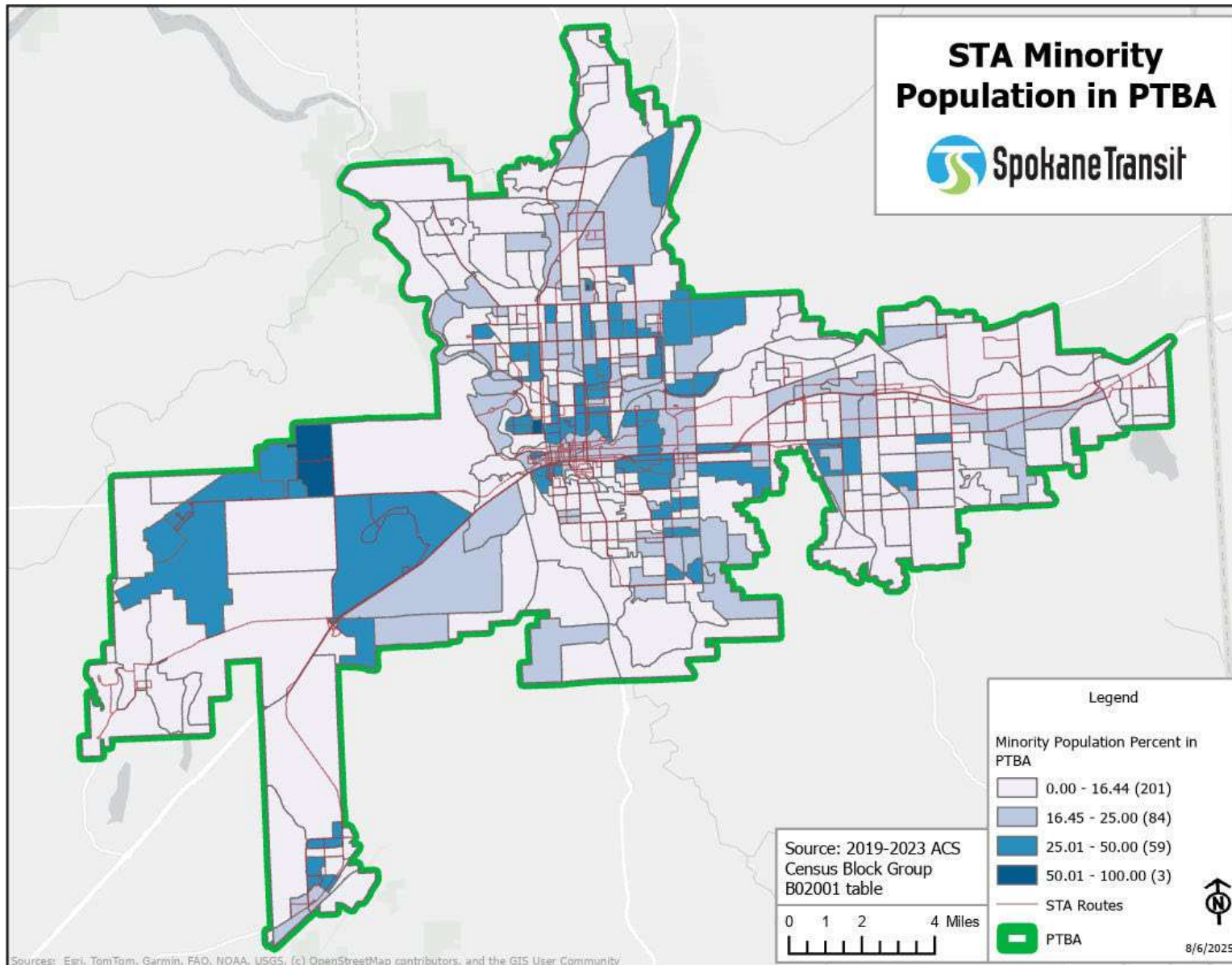
Using data from the 2019-2023 5-year ACS Community Survey, census block group information was tallied along each STA route to determine the total minority population, the total low-income population, and the total population living within 1/4 mile of a STA route. Using these totals, the percentage of minority and low-income population served by a route was calculated. Following STA policy, the highlighted routes (yellow for minority %, and red for low-income %) in Table 2 were higher than the PTBA estimate in Table 1 and identified as a minority and/or low-income routes. Maps 2 (minority population) and 3 (low-income population) identify the block groups that exceed the overall percentages for those populations in the PTBA.

Table 2: Minority and Low-Income Routes (in service as of May 2025)

Route	Population	Minority Population	Minority %	Population with Known Poverty Status	Low-income Population	Low-income %
1	13,067	3,207	24.5%	11,550	3,745	32.4%
4	29,576	5,370	18.2%	28,805	4,912	17.1%
6	16,647	4,028	24.2%	15,158	4,444	29.3%
9	29,617	5,347	18.1%	29,206	6,364	21.8%
11	9,378	2,137	22.8%	8,937	2,885	32.3%
12	3,868	898	23.2%	3,298	1,416	42.9%
14	5,471	830	15.2%	5,159	1,669	32.4%
20	11,742	2,956	25.2%	11,376	2,868	25.2%
21	5,978	1,225	20.5%	5,854	1,575	26.9%
22	7,879	1,992	25.3%	7,526	2,050	27.2%
23	14,180	2,675	18.9%	13,772	2,491	18.1%
25	21,221	3,571	16.8%	20,767	2,851	13.7%
27	22,076	4,751	21.5%	20,337	4,565	22.4%
28	25,129	4,756	18.9%	24,295	4,247	17.5%
31	24,131	5,187	21.5%	22,092	5,114	23.1%
32	25,811	5,720	22.2%	25,392	4,571	18.0%
33	7,613	1,071	14.1%	7,515	1,194	15.9%
34	22,454	4,500	20.0%	22,350	3,312	14.8%
35	8,621	1,804	20.9%	8,401	895	10.7%
36	19,212	3,776	19.7%	19,035	2,893	15.2%
43	18,259	3,732	20.4%	17,661	4,937	28.0%
45	21,717	4,160	19.2%	21,434	3,008	14.0%
60	9,675	1,443	14.9%	9,442	2,480	26.3%
61	7,112	1,644	23.1%	7,031	1,513	21.5%
62	10,448	2,980	28.5%	9,415	2,056	21.8%
63	10,053	2,102	20.9%	9,883	1,725	17.5%
65	1,356	291	21.5%	1,291	80	6.2%
66	3,067	1,005	32.8%	2,517	445	17.7%
67	13,799	3,411	24.7%	12,757	3,274	25.7%
68	7,216	1,842	25.5%	6,064	2,208	36.4%

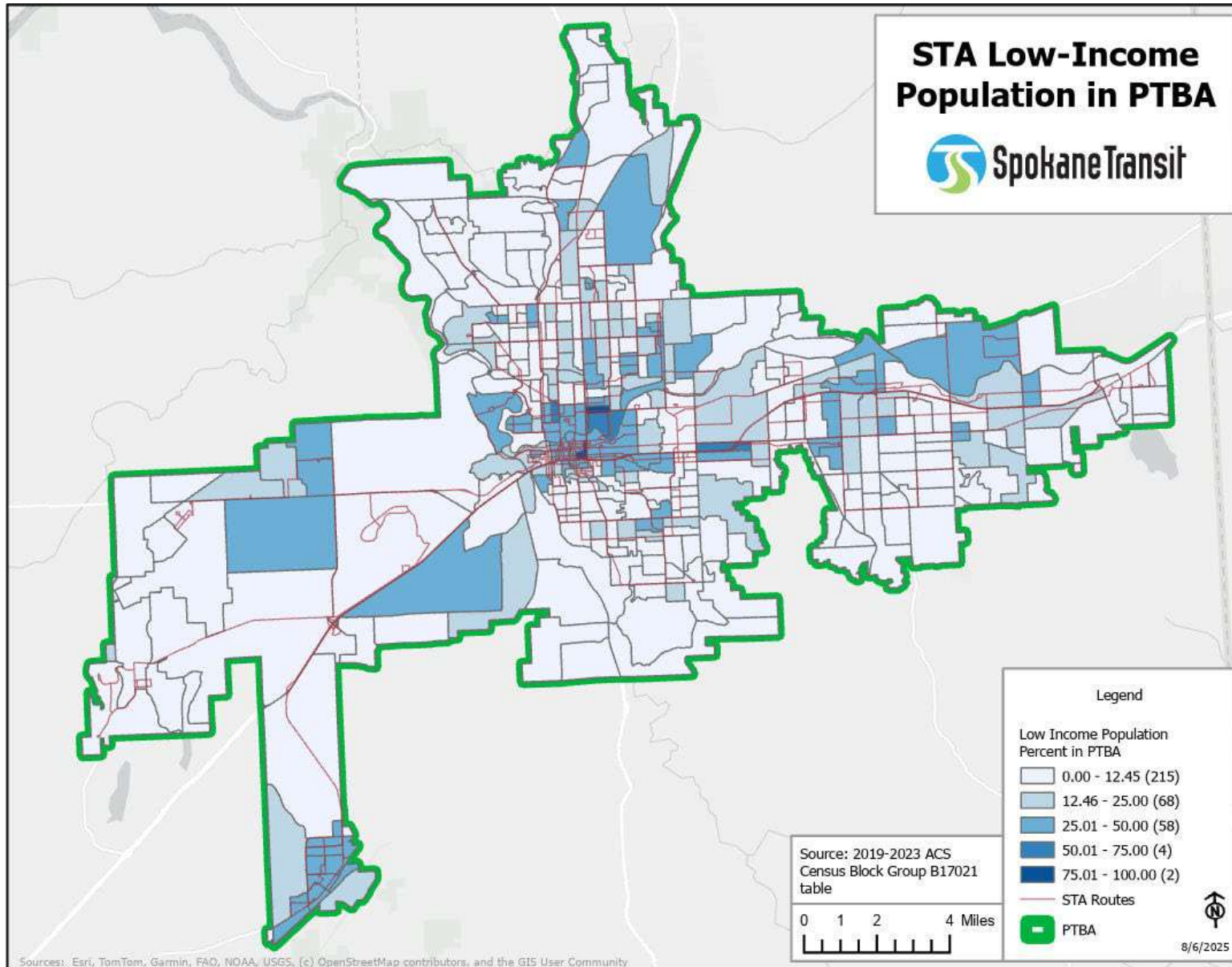
Route	Population	Minority Population	Minority %	Population with Known Poverty Status	Low-income Population	Low-income %
74	9,231	2,277	24.7%	7,996	2,848	35.6%
94	25,577	4,307	16.8%	25,198	5,618	22.3%
95	1,203	121	10.1%	1,198	62	5.2%
96	16,993	2,870	16.9%	16,399	3,648	22.2%
97	13,685	2,168	15.8%	13,500	2,201	16.3%
98	11,718	1,818	15.5%	11,458	1,806	15.8%
124	17,760	2,789	15.7%	17,394	1,576	9.1%
144	12,060	2,105	17.5%	11,954	1,997	16.7%
172	20,101	3,709	18.5%	18,973	3,311	17.5%
173	14,935	2,186	14.6%	14,758	1,806	12.2%
190	26,218	4,341	16.6%	25,837	5,522	21.4%
223	17,773	3,506	19.7%	17,470	4,673	26.7%
247	15,755	3,330	21.1%	15,223	4,485	29.5%
294	18,204	2,659	14.6%	18,008	1,812	10.1%
633	15,300	2,927	19.1%	14,944	2,949	19.7%
661	13,199	2,766	21.0%	12,591	1,507	12.0%
662	2,347	447	19.0%	2,327	315	13.5%
663	1,610	312	19.4%	1,593	218	13.7%
664	8,393	1,926	22.9%	8,301	1,691	20.4%
724	10,635	2,733	25.7%	9,852	2,318	23.5%
771	27,924	5,613	20.1%	26,572	4,530	17.0%

Map 2: Block Groups Exceeding 16.4% Minority Population



Source: U.S. Census Bureau 2019-2023 American Community Survey 5-Year Estimates
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Map 3: Block Groups Exceeding 12.5% Low-income Population



Source: U.S. Census Bureau 2019-2023 American Community Survey 5-Year Estimates
Final Draft

2025 Rider Census

STA conducted its most recent Title VI on-board rider survey from April 28, 2025, to May 9, 2025. The 2025 Rider Census is used to determine riders' travel patterns, as well as key demographic characteristics related to Title VI. In addition, the objectives of the survey explored fare and pass types, trip origin and destination, trip purpose, mobility, and access to electronic payment options, smart phone, and internet. A total of 1,739 responses were collected from riders. A copy of the 2025 Rider Census survey instrument can be found in Appendix B.

Rider Census Survey Conclusions

Based on the sample data gathered for this survey, 36.3% identified as minority and 43.7% identified as low-income as defined by the Federal government. Low-income was measured by comparing the income bracket and household size reported by individuals with the 2025 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, 48.5% of all respondents used the Connect fare system to pay for their trip, while 18.2% used a University ID, 11.9% used cash, and 4.9% used another pass system. For those using limited use Connect passes, 43.8% use the Connect Day Pass, 37% use the Connect 1-Ride Pass, and 12.3% use the Connect 7-Day Pass. Of those using paper passes, 5.5% continue to use the Legacy 31-day pass which is being phased out¹, and 1.4% are using ticket vending machine passes. According to the responses, 59% of riders use a reduced fare.

Those respondents who identified as minority were more likely to have paid for their fare using the Connect fare system (60.2%) while 14.3% of minorities relied on cash to pay for their fare. Among low-income respondents 53.6% also used the Connect fare system, with only 13.5% of low-income respondents indicating they paid a cash fare. For limited-English proficient (LEP) respondents, 39% use the Connect system while 15.9% of LEP respondents rely on cash to pay for fare.

The survey results showed that riders are purchasing their fares or passes online (20.8%), at a transit center or station (19.5%), and on the bus (15.9%). Low-income respondents (27.2%) and minority respondents (24.7%) were more likely to purchase fare at transit centers or stations, while LEP respondents (24.2%) were more likely to purchase fare on the bus.

2025 Provider Survey

STA conducted a survey in July 2025 aimed at engaging local community-based organizations (CBOs) who serve minorities, low-income, and limited English proficient (LEP) populations. The 2025 Provider Survey is used to understand community needs through feedback on challenges faced while accessing the transportation system, and to identify gaps through feedback on barriers and service needs. This survey was distributed to 105 different CBOs and 230 organizational contacts; a total of 45 different CBOs responded with a total of 50 responses. A copy of the 2025 Provider Survey instrument can be found in Appendix C.

Provider Survey Conclusions

The results of the survey provided insight into the perceived travel patterns and needs of the clients they serve. According to the respondents' answers, 78% of CBOs serve minority and/or limited or non-

¹ Sales of Legacy passes ended in March 2025

English speaking individuals and 100% of CBOs serve low-income individuals. The top five languages served and translated are Ukrainian, Marshallese, Russian, Arabic, Spanish, and Vietnamese.

The survey results identified that 51% of minority and limited English-speaking individuals and 47% of low-income individuals served rely on transit 5-7 days per week. Respondents also identified that 27% of minority and limited English-speaking individuals served have trouble using transit, while 61% of low-income individuals have trouble using transit. The main challenges in using transit for minorities, limited or non-English speaking individuals, and low-income individuals is cost, followed by knowledge/training of how to ride the bus.

Based on the survey results, 37% of CBOs surveyed indicate that the best way to communicate with limited or non-English speaking individuals is by using an in-person interpreter. Additionally, 89% of CBOs surveyed indicate that the best way to communicate with low-income individuals is in-person. In addition, 40% of CBOs indicate that providing food is a method used to engage low-income individuals.

2025 Targeted Outreach

In September 2025, STA engaged local community-based organizations (CBOs) who serve minorities, low-income, and limited English proficient (LEP) populations. The targeted outreach approach included four open focus group sessions and seven in-person meetings at CBO locations. The purpose of this targeted outreach was to better understand the barriers and challenges their clients face when accessing public transit. STA sent email invites and reminders to 39 different CBOs to participate in focus group sessions or one-on-one meetings. STA was able to interact with 10 CBOs throughout this outreach effort. A copy of the 2025 Targeted Outreach Report can be found in Appendix D.

Targeted Outreach Conclusions

All participating CBOs served low-income and minority populations, and six also served LEP populations. Key findings show that in-person communication is the most effective way to reach clients, and the top five languages served are Spanish, Ukrainian, Arabic, Russian, and Marshallese. All CBOs offer some form of travel training, though methods vary.

The outreach efforts highlighted several challenges related to accessing public transit, with language access barriers being the most common concern. Specifically, clients struggle with understanding route changes and detours that aren't translated, using the Connect card/app (often leading them to pay more via on-bus fare payments), and a general lack of translated information on buses, at The Plaza, and at stations. Another major challenge is a lack of understanding about fare payment options, including pass programs, fare capping, and the Youth Ride Free program.

To address these issues, CBOs strongly suggested incorporating clear images, icons, or graphics on routes to quickly indicate major destinations, as well as providing more translated content that explains all STA services (including Paratransit and Rideshare), how to use the Connect system, and how to get language assistance.

Section 5: Public Participation Plan

Overview

To encourage public participation in STA's 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 October 17, 2024. 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

As a public agency, STA 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 improves daily, creating both opportunities and challenges. Fortunately, STA leverages this variety of communications tools to both inform and gather information. Goals of public outreach efforts include, but are not limited to, building relationships through community involvement, education regarding transit issues/options, and soliciting valuable input.

In addition to engaging the public, STA seeks to engage and include minority, low-income, and LEP populations in public outreach activities. This is especially important when the proposed changes impact bus service in these communities.

STA uses a variety of strategies to disseminate information that pertains to proposed service changes that impact protected groups. In addition to wide distribution of brochures that detail proposed changes, the agency also utilizes rider alerts, text and e-mail notifications, social media and posters on its entire fleet. STA hosts project/policy specific open houses and distributes information via e-mail to contact lists generated by those open houses. It also utilizes advertising and leverages earned media coverage with local news outlets. Detailed information is made available on STA's website and is also distributed through local neighborhood associations, school districts and social service agencies (including those focused on LEP outreach). STA solicits comments in person, by e-mail, via the project website, U.S. mail, and by phone.

STA's Communications and Public Input goals and policies, as well as potential communication tools, can be found in the Board-adopted *Connect Spokane: A Comprehensive Plan for Public Transportation*, located here: <https://www.spokanetransit.com/projects/comprehensive-plan/>

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 them of public meetings, open houses, and other STA activities so they can get the word out to these populations they serve
- Published notices in newspapers serving primarily minority populations
- Targeted ads on social media platforms
- On board rider survey to gather demographic data

Summary of Public Outreach and Involvement

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

Division Street Bus Rapid Transit (BRT)

Division Street BRT will be the second BRT line in the Spokane region, extending from downtown Spokane along the Division Street Corridor for approximately ten miles to the Mead area. The project will deliver high-quality, fast, and frequent bus service in a revitalized and vibrant Division Street corridor. Key features will include zero emission buses, 43 new stations at major intersections, transit signal priority for buses, Business Access and Transit (BAT) lanes, bike and pedestrian facilities, and improved access to services. Service is expected to begin in 2030.

Public outreach has included:

- Neighborhood Council updates at least once per year since 2022
- Presentations to local boards, councils and community groups
- In-person open houses
- Online virtual open house
- Online surveys
- Letters to property owners, business owners and taxpayers within ½ mile of the corridor
- Letters to property owners, business owners and taxpayers adjacent to future station locations
- In-person meetings with property owners, business owners and taxpayers adjacent to future station locations
- Post card mailers about the project
- Social media posts
- Project website updates

Connect 2035

Connect 2035 is STA's strategic plan update, outlining a strategic roadmap for public transportation service through 2035. Public outreach included the following:

- STA Board Involvement that included one-on-one interviews with each individual Board member, as well as four distinct workshops with the Board members
- Public Outreach
 - Twenty-seven Community Organization Leader insight interviews with community leaders, including representatives from minority and low-income organizations
 - Three Online Community Surveys that were available in English and the safe harbor languages with over 2,400 responses across the surveys
 - Fifteen community events across the region that STA staffed, which included interactive activities with the public

- Twenty listening sessions with targeted community members from underrepresented groups, including low-income, minority, refugees, and immigrants; as well as downtown employees and STA riders
- Ten presentations with boards and commissions in each municipality in our service area

Project Specific Outreach

STA 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:

- Inviting specific stakeholders to listening sessions to gather input and encourage participation
- 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,” and translated into the safe harbor languages.
- Outreach and sponsorship at community events that interact with minority, low-income and limited English populations. Examples include Unity in the Community, Valleyfest, El Mercadito, and Bloomsday.
- Collection of demographic data at outreach events to understand what groups are participating

Section 6: Limited English Proficiency and Language Assistance Plan

Introduction

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.

To analyze and address the needs of LEP populations, STA has developed a Language Assistance Plan that outlines outreach strategies to ensure that LEP persons have meaningful access to its programs and services. These outreach strategies were developed by conducting a Four-Factor Analysis in accordance with the Federal Department of Transportation's LEP guidance.

Four Factor Analysis

Four-Factor Summary

Based on 2023 ASC 5-year estimates within the STA service area, LEP persons represent 2.8% of the total population. Of that LEP population, 7.9% primarily commute by transit. Based upon these findings, 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 to assist them in how to use the bus. As a result, 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.

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 encounter an STA program, activity, or service?
- What is the nature and importance of the program, activity, or service provided by STA to the LEP community?
- What are the resources available to STA and overall costs?

Service Coverage

The service area defined for STA's Title VI Program 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. To better understand the population within STA's PTBA, data was collected using U.S. Census Tracts partially or completely within the PTBA boundary. 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 4), language spoken (Table 5), and transportation mode (Table 6) 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. STA received responses from 45 different organizations.
- Focus groups and interviews with community-based organizations working with LEP populations in Spokane. STA received responses from 10 different organizations.

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 (LEP). According to the 2023 American Community Survey (ACS), 13,770 of the 490,488 people within the PTBA reported speaking English “less than very well”, or 2.8% (Table 3). Map 4 shows the percentage of LEP population within the PTBA by census tract.

Table 3: PTBA LEP Population by Census Tract

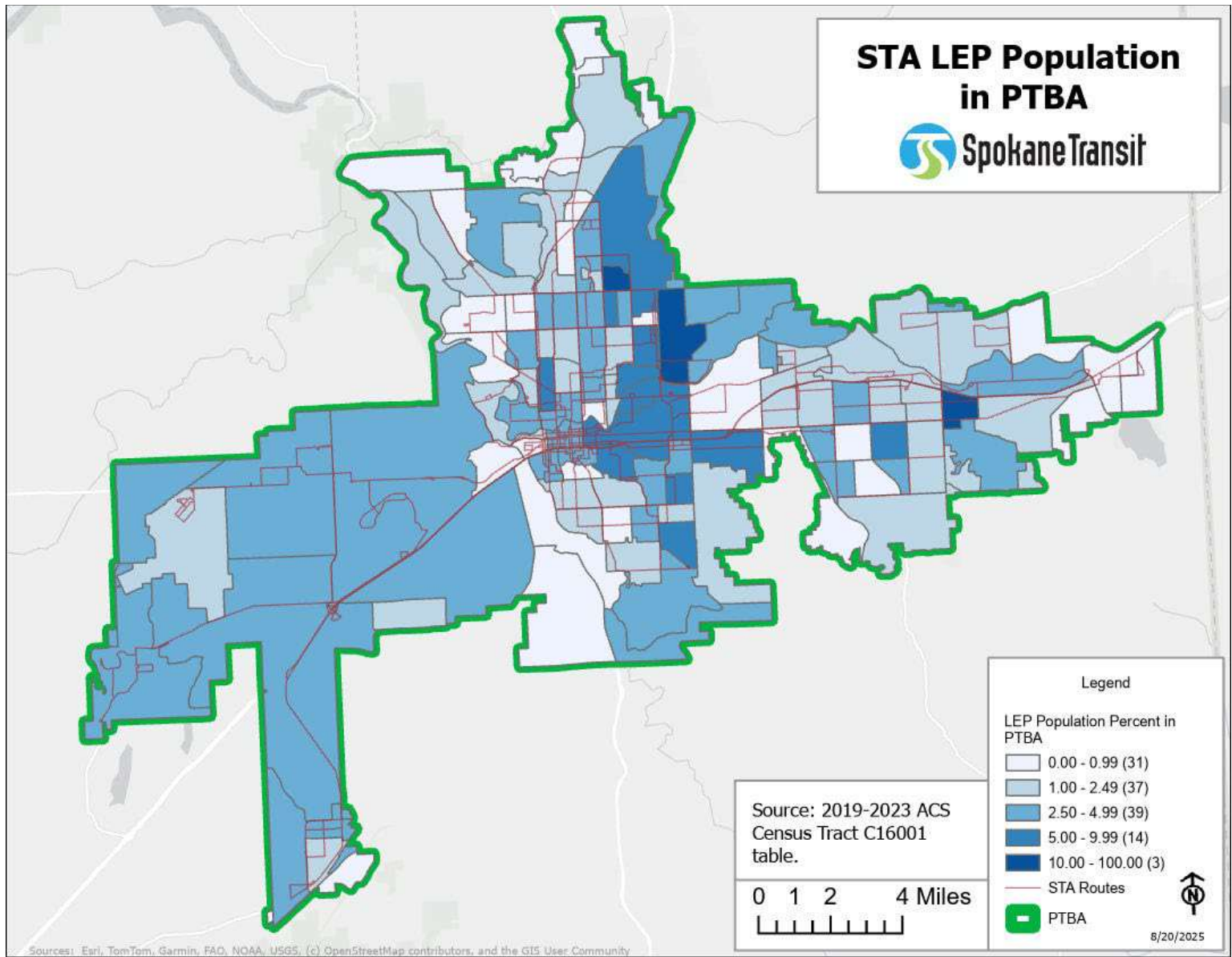
Census Tract	Total Population	Estimate Speaks English Less Than Very Well	Percent
2.01	2,907	202	7.0%
2.02	1,588	13	0.8%
3.01	2,843	84	3.0%
3.02	2,934	200	6.8%
4	4,397	182	4.1%
5	3,092	106	3.4%
6	3,068	120	3.9%
7	4,963	11	0.2%
8	5,215	57	1.1%
9	6,122	11	0.2%
10	5,606	54	1.0%
11	3,173	120	3.8%
12	2,241	39	1.7%
13	3,280	54	1.7%
14	6,607	218	3.3%
15	7,002	163	2.3%
16	3,192	172	5.4%
18	2,670	168	6.3%

Census Tract	Total Population	Estimate Speaks English Less Than Very Well	Percent
19	3,654	70	1.9%
20	3,513	264	7.5%
21	2,290	32	1.4%
23	4,633	180	3.9%
24	3,314	130	3.9%
25.01	2,971	147	5.0%
25.02	2,608	44	1.7%
25.03	2,590	5	0.2%
26	4,653	361	7.8%
29	3,306	102	3.1%
30	2,499	223	8.9%
31	5,088	289	5.7%
32	2,834	106	3.7%
35	2,860	80	2.8%
36.01	2,772	38	1.4%
36.02	2,323	20	0.9%
38	1,737	1	0.1%
39	2,136	0	0.0%
40.01	2,640	123	4.7%
40.02	2,633	127	4.8%
41	2,077	7	0.3%
42	4,796	60	1.3%
43	3,422	59	1.7%
44	4,586	19	0.4%
45	3,574	45	1.3%
46.01	3,955	170	4.3%
46.02	2,917	166	5.7%
47.01	3,026	54	1.8%
47.02	3,323	158	4.8%
48	4,723	416	8.8%
49	5,673	110	1.9%
50	4,880	158	3.2%
101.01	4,067	164	4.0%
102.03	4,201	0	0.0%
103.03	3,225	21	0.7%
103.05	7,798	39	0.5%
104.01	8,376	268	3.2%
104.03	3,677	183	5.0%
104.04	3,144	29	0.9%
105.04	3,515	23	0.7%

Census Tract	Total Population	Estimate Speaks English Less Than Very Well	Percent
105.05	3,381	65	1.9%
105.06	5,900	29	0.5%
105.07	4,801	72	1.5%
105.08	4,463	10	0.2%
106.01	3,384	36	1.1%
106.03	4,388	49	1.1%
106.04	3,818	3	0.1%
107.01	4,388	80	1.8%
107.02	4,038	148	3.7%
108	2,122	17	0.8%
109.01	2,518	7	0.3%
109.02	3,096	32	1.0%
110	3,406	75	2.2%
111.02	4,039	129	3.2%
111.03	2,663	110	4.1%
111.04	2,732	45	1.7%
112.02	3,902	157	4.0%
112.03	5,451	412	7.6%
112.04	2,142	425	19.8%
113.01	3,783	117	3.1%
113.02	4,778	170	3.6%
114	5,826	93	1.6%
115	1,461	63	4.3%
116	1,751	18	1.0%
117.01	2,453	31	1.3%
117.02	7,440	181	2.4%
118	5,536	102	1.8%
119	5,000	132	2.6%
120	4,120	44	1.1%
121	2,510	48	1.9%
122	2,044	6	0.3%
123	5,756	402	7.0%
124.01	5,927	56	0.9%
124.02	6,612	99	1.5%
125	3,412	88	2.6%
126	4,116	37	0.9%
127.01	3,776	257	6.8%
127.02	2,563	96	3.8%
128.01	3,666	9	0.3%
128.02	3,694	177	4.8%

Census Tract	Total Population	Estimate Speaks English Less Than Very Well	Percent
129.01	2,694	27	1.0%
129.02	7,465	146	2.0%
130.01	1,576	20	1.3%
130.02	2,934	314	10.7%
130.03	6,736	177	2.6%
131.01	7,941	301	3.8%
131.02	5,571	126	2.3%
132.01	6,760	29	0.4%
132.03	2,505	17	0.7%
132.04	5,202	28	0.5%
132.05	3,670	35	1.0%
133	3,241	16	0.5%
134.01	5,771	80	1.4%
135.01	1,949	44	2.3%
135.02	2,451	117	4.8%
135.03	5,118	16	0.3%
136	4,588	205	4.5%
137	3,888	116	3.0%
138	2,473	32	1.3%
139	5,705	149	2.6%
140.01	5,108	110	2.2%
140.02	5,975	208	3.5%
141	6,745	243	3.6%
142	3,718	24	0.7%
144	4,775	482	10.1%
145	2,164	116	5.4%

Map 4: PTBA LEP Population by Census Tract



Source: U.S. Census Bureau 2019-2023 American Community Survey 5-Year Estimates
 Final Draft

ACS data was collected at the county level to identify languages spoken by LEP populations in Table 4. Overall, 2.8% of the Spokane County population speaks a language other than English at Home while also speaking English less than “very well”.

Table 4: Language Spoken at Home by Ability to Speak English

Language	Estimate	% County Population	Speak English "very well"	Speak English less than "very well"	% Total Population who Speak Language less than "very well"	% Population of Language Speakers who Speak English less than "very well"
Total	513,629					
Speak only English	474,921	92.5%				
Spanish	12,275	2.4%	8,689	3,586	0.7%	29.2%
Russian, Polish, or other Slavic languages	7,807	1.5%	4,381	3,426	0.7%	43.9%
Other Asian and Pacific Island languages	4,449	0.9%	2,416	2,033	0.4%	45.7%
Other Indo-European languages	2,878	0.6%	1,811	1,067	0.2%	37.1%
Arabic	2,223	0.4%	1,229	994	0.2%	44.7%
Vietnamese	1,932	0.4%	802	1,130	0.2%	58.5%
German or other West Germanic languages	1,625	0.3%	1,452	173	0.0%	10.6%
Other and unspecified languages	1,774	0.3%	1,309	465	0.1%	26.2%
Tagalog (incl. Filipino)	1,245	0.2%	947	298	0.1%	23.9%
Chinese (incl. Mandarin, Cantonese)	1,057	0.2%	528	529	0.1%	50.0%
French, Haitian, or Cajun	892	0.2%	771	121	0.0%	13.6%
Korean	551	0.1%	369	182	0.0%	33.0%

Source: U.S. Census Bureau 2023 American Community Survey 5-Year Estimates. Table C16001: Language Spoken at Home

Input from Community Organizations

Based on the 2025 Provider Survey responses and targeted outreach to community based organizations, the most common languages encountered by community organizations are Spanish, Russian, Arabic, Ukrainian, Marshallese, and Vietnamese.

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

Census Overview

The 2023 ACS 5-year estimates include data on main mode of commute to work among LEP and non-LEP populations. This data shows that for the service area, 2.8% (7,086 out of 249,592) of total workers over the age of 16 are LEP. LEP workers aged 16 and over who commute to work mainly by transit represent 0.2% (379 out of 249,592) of total commuters aged 16 and up. Of all the LEP commutes in the service area, only 7.9% (379 out of 4,800) use public transit for their work commute. Table 5 below shows estimates of LEP riders for each commute type.

Table 5: Means of Transportation to Work and Ability to Speak English

Description	PTBA Estimate	LEP Estimate within PTBA # Persons
Workers 16 years and over	249,592	7,086
Car, truck, or van – drove alone	176,926	3,942
Car, truck, or van – carpooled	21,829	1,674
Public transportation (excluding taxicab)	4,800	379
Walked	6,683	218
Taxicab, motorcycle, bicycle, or other means	3,887	156
Worked at home	35,467	717

Source: U.S. Census Bureau, 2023 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

- 51% of survey respondents indicated that the limited English proficiency clients they served relied on transit for their transportation needs.
- The most frequent locations LEP clients traveled to and from were Downtown Spokane, North Spokane, Northeast Spokane, and Spokane Valley.

Translation Requests

There were numerous requests for translation received during the 2023-2025 assessment period. In 2023 there were 94 requests for translation services, in 2024 there were 87 requests, and in the first 8 months of 2025 there were 60 requests. Many of these requests came from the Customer Service and Security department, located in the downtown STA Plaza. Table 6 below identifies the languages assistance requested for by year.

Table 6: Translation Services Requests by Year and Language

Language	2023	2024	2025	% Language Requested
Spanish	77	65	51	80.1%
Russian	14	9	4	11.2%
Arabic	3	7	1	4.6%
Vietnamese		2	1	1.2%
Ukrainian			1	0.4%
Burmese		1		0.4%
Swahili		1		0.4%
Dari		1		0.4%
Somali		1		0.4%
Dinka			1	0.4%
French			1	0.4%
Total	94	87	60	

Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by STA to the LEP Community

Description of Services

As a regional public transportation agency, STA 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, STA operates within Spokane County, with an estimated total population of 559,400 based on OFM 2024 county population estimates. STA serves the PTBA encompassing approximately 248 square miles and 475,470 residents, or 85% of the county population based on OFM 2025 PTBA population estimates and 2024 county population estimates.

In addition to fixed route services, STA provides Americans with Disabilities Act (ADA) Paratransit and Rideshare 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. Rideshare service augments STA’s public transportation system through the assignment of passenger vehicles to commuting groups.

Factor 4: The Resources Available to STA 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

- STA’s website is translatable with Google Translate.
- STA contracts with CTS LanguageLink to provide telephone interpretation. These services are used by Paratransit Reservations, Security, Customer Service, and the Ombudsman & Accessibility Officer.
- STA contracts with NWI Global to provide written translation services upon request of an

- individual. These services are also used when STA is conducting 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.

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 for the time period 2023-2025 was \$1,022.09.
- The cost for written translations from NWI Global for the time period 2023-2025 was \$49,986.86.

Determination of LEP Assistance Needed

Based upon survey results and feedback from, 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 LEP Populations and Individuals

This plan was 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 serve LEP populations.
- Update the distribution list as needed.
- Send surveys to community organizations inquiring about the demographics of the LEP populations they serve and about the services they provide.
- 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 on the STA website as well as on all STA revenue service vehicles. Notice of translation service will be provided in Spanish, Russian, Vietnamese, Ukrainian, Marshallese, and Arabic, the 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.

Щоб отримати інформацію іншою мовою, зателефонуйте за номером (509) 325-6094.

Elañe mejeje ej aikuj ilo juon bar kajin, kerāake (509) 325-6094.

الرقم مع فتواصل أخرى، بلغة المعلومات إلى احتجت إذا (509) 325-6094.

Language Translation Upon Request

The STA Ombudsman & Accessibility Officer will provide plans, forms, and other STA 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

Point to your language
An interpreter will be provided at no cost to you

Arabic
يرجى الإشارة إلى لغتك. سيتم إمدادك بمترجم مجاناً.

Armenian
Էշեք ձեր լեզուն: Ձեզ կտրամադրվի անվճար թարգմանիչ:

Bengali
আপনার ভাষার দিকে নির্দেশ করুন। আপনার জন্য বিনামূল্যে একজন দোভাষী প্রদান করা হবে।

Cebuano/Visayan
Itudlo ngadto sa imong lengguwahe. Adunay ihatag kanimo nga tighubad nga walay bayad.

Dari
به زبان خود اشاره کنید. برایتان یک مترجم بدون هزینه فراهم خواهد شد.

Filipino
Naiturongmo ito pagsasaom. Maipaay ti interpreter nga awan ti bayadna kenka.

Korean
당신의 언어를 가리키세요. 해당 언어로 통역 서비스가 무료로 제공됩니다.

Kosraean
Kut luhs en kuhsae. Ah nuh insahkuhn luhl kuhsaehkuhn ah fuhsuhk mihmi.

Mandarin
请指出您的语言。我们会免费为您提供一名口译人员。

Marshallese
Jikka eok ilo kajin eok. Renanaaj kōmmāne aolepān eo ak kajjitōlōk eok.

Russian
Укажите язык. Переводчик будет предоставлен вам бесплатно.

Spanish
Indique su idioma. Se le proporcionará un intérprete, sin costo.

Swahili
Fanya ishara kwa lugha yako. Mkalimani atatolewa bila malipo yako.

Somali
Tilmaan luuqaddaada. Turjubaan ayaa si bilaash ah lagugu siin doonaa.

Thai
โปรดชี้ไปยังภาษาของคุณ เราจะจัดสำเนาให้โดยไม่มีค่าใช้จ่ายสำหรับคุณ

Tigrinya
ናይ ቋንቋኻ ኣመልክት። ተርጓሚ ብዘይ ክገብረኻ ወዲኡ ታት ክቐርበልኻም እየ።

Tongan
Tuhi ki ho'oleá. 'E 'oatu ha tokotaha faka'uhinga lea 'o 'ikai ha totongi kiate koe.

Vietnamese
Hãy trỏ tới ngôn ngữ của bạn. Bạn sẽ được cung cấp một thông dịch viên miễn phí.

Ukrainian
Вкажіть вашу мову. Перекладач буде надано вам безкоштовно.

BIG
LANGUAGE SOLUTIONS

Trust Every Word™
300+ Languages | 24x7x365
info@biglanguage.com | biglanguage.com

Staff Training

The LEP Plan is distributed to all STA customer service employees. This information is part of STA's staff orientation process for all new employees. Training topics include:

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

Transit Operators are trained on STA's procedure for assisting LEP populations. This training 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 the operator is talking through an interpreter, direct the conversation to the customer, not the interpreter.
- Don't pretend to understand if you have difficulty understanding a customer's communications style. Instead, ask them to slowly repeat the information because 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 each coach located behind the Driver's seat. Refer people to the STA's Ombudsman & Accessibility Officer at (509) 325-6094 if necessary.
- If further assistance is necessary, 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 easily updated. At a minimum, STA 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 that translation services are needed?
- Is there still a need for continued language assistance for previously identified STA programs? Are there other programs that should be included?
- Have STA's available resources, such as technology, staff, and financial costs, changed?
- Has STA 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 provides 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. The Four-Factor Analysis includes the nature and importance of the program, frequency of contact, and resources that permit the inclusion of other languages when necessary for meaningful access, even if a breakdown of the aggregated census data is not available.

Languages Meeting the Safe Harbor Threshold

- **Spanish, Russian, Vietnamese:** These languages meet the numerical or proportional threshold (Table 4) are therefore designated as Safe Harbor language, requiring the translation of vital documents.

Languages Included Based on Four-Factor Analysis

- **Ukrainian and Marshallese:** These languages may be counted under Other Slavic languages and Other Pacific Island languages that meet the numerical or proportional threshold (Table 4) are therefore designated as Safe Harbor language, requiring the translation of vital documents into the most frequently encountered language(s) within those categories to ensure meaningful access. The inclusion of these languages in the Safe Harbor provision is warranted due to the high contact and service volume reported by CBOs, which are key factors in the broader Title VI compliance analysis.
- **Arabic:** Although this language does not meet the numerical or proportional threshold (Table 4), its proximity to the threshold suggests it will likely qualify by the next update, making proactive inclusion efficient and compliant with requirements to ensure meaningful access. The inclusion of this language in the Safe Harbor provision is warranted due to the high contact and service volume reported by CBOs, which are key factors in the broader Title VI compliance analysis. Therefore, Arabic is designated as Safe Harbor language, requiring the translation of vital documents.

As of the 2023 ACS 5-year estimates, Spanish, Russian, and Vietnamese meet the threshold for “Safe Harbor” languages in Spokane County. Feedback from the Rider Census, Provider Survey, and targeted outreach indicate that Ukrainian, Marshallese, and Arabic languages are frequently served. STA will consider all six languages as “Safe Harbor” languages in Spokane’s Public Transportation Benefit Area (PTBA).

Dissemination of the STA LEP Plan

STA will post the LEP plan on its website as part of STA’s overall Title VI Program, found here:

<https://www.spokanetransit.com/projects/title-vi-non-discrimination-policy-and-program/>

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

Ombudsman and Accessibility Officer

1230 W. Boone Avenue

Spokane, WA 99201

(509) 325-6094

TTY Relay 711

ombudsman@spokanetransit.com

Section 7: Ensuring Subrecipient Compliance

Program Overview

STA is the designated recipient of Section 5310 Enhanced Mobility funds in the Spokane region from the Federal Transit Administration (FTA). 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 approved to provide human services transportation, or operators of public transportation.

Subrecipients must submit Title VI Programs to STA to assist in compliance efforts. STA requests the Title VI Programs to be submitted electronically. Some of the subrecipients do not have Title VI programs and are given at least 90 days (from execution of agreement) to get a program approved. If extra time is needed the subrecipient must request an extension from STA. Subrecipients must submit an updated Title VI program every three years to be reviewed and approved by STA to ensure programs remain compliant.

STA staff helps subrecipients with regard to 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 Program. Subrecipients are given the choice to adopt STA'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, and/or lawsuits. Additional technical assistance is provided on an as-needed basis.

STA staff monitor subrecipient performance to ensure compliance with Title VI regulations. 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 current FTA circulars to include, but not limited to, the main FTA circular C 4702.1B.

- Ensure that project agreements with subrecipients contain all required federal clauses.
- On an annual basis, send a notice to subrecipients requesting a copy of A-133 audit report or other financial documentation (if the subrecipient received less than \$750,000 in federal funding from all sources).
- The Subrecipient will sign the application for funding to certify that they will carry out the program in compliance with FTA's Title VI regulations. This is a requirement before STA can provide any federal funds to the subrecipient.
- Subrecipients shall submit their Title VI Program to STA to have on file. STA also files a copy of the agreement and contract.

Subrecipient Title VI programs shall at a minimum include the following information:

- A copy of the Title VI Notice to the public and location it is posted for public to view (local

- newspaper, website, work locations, and/or posted inside vehicles)
- Title VI discrimination complaint procedures
- A copy of the complaint form
- List of complaints, investigations, or lawsuits related to public transportation activities
- Most recent census data to identify demographics of service area including minorities, language spoken at home, and income
- A public participation plan that includes an outreach plan to engage minority and limited English proficient populations. **Note: In lieu of developing their own public participation plan, the subrecipient may adopt STA's plan.**
- Provide a summary of outreach efforts since last Title VI program submission, particularly to low-income, LEP, and minority populations.
- A copy of the subrecipient's plan for providing language assistance to persons with limited English proficiency, based on the four-factor analysis. **Note: In lieu of developing their own LEP Plan, the subrecipient may adopt STA's plan.**
- How notice is communicated that language assistance is available and how the program is monitored and updated
- How employees are trained to provide timely and reasonable language assistance
- 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.
- Any new subrecipient operating facilities requiring a Title VI equity analysis
- Appropriate documentation showing that the organization's governing body or official(s) responsible for policy decisions have reviewed and approved the Title VI program.

Table 7: List of Current Subrecipients

Apportionment Year	Subrecipient	Project
2022	COAST Transportation	ADA Vehicle Purchase
	Special Mobility Services	Mobility Management
	Arc of Spokane	Community Center Transportation
	Cancer Can't	Transportation Support for Cancer Patients
	COAST Transportation	Demand Response
	SNAP Resource Rides	Neighbors on the Go
2023	Cancer Can't	Transportation Support for Cancer Patients
	SNAP Resource Rides LLC	Neighbors on the Go
	Southside Community Center	Operational grant for 14 passenger van
	Special Mobility Services (SMS)	Mobility Training
	Special Mobility Services (SMS)	Spokane Shopper
	Project ID	ADA Vehicle
2024	Special Mobility Services (SMS)	Mobility Management
	Riverview Community	ADA Vehicle
	COAST	ADA Vehicle
	Cancer Can't	Transportation Support for Cancer Patients
	COAST	Demand Response for Regional Community
	The Arc of Spokane	Community Center Transportation Specialist & Driver

Section 8: System-wide Services Policies and Standards

Overview

STA’s System-wide Service Standards and the Service Policies were adopted by the STA Board in 2010 as part of the agency’s comprehensive plan, *Connect Spokane*. The plan was formed as part of an extensive public process. Amendments were made to the policies and standards in October 2024. A public hearing was held on September 19, 2024, and the Board adopted the amendments on October 17, 2024.

System-wide Service Policies

Table 8 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 8: System-wide Service Policies

Service Policy	STA Definition
System-wide Transit Amenities	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>(Connect Spokane, Transit Equity and Inclusion Policy – 4.5 System-wide Transit Amenities Service Policy)</i>
Signage at Bus Stops	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>(Connect Spokane, System Infrastructure Policy – 2.7 Stops)</i>
Design Standards for Bus Stop Areas	Coordinate with local and regional jurisdictions to establish, maintain and implement uniform design standards for the bus stop environment. Standardization of the elements that make up the bus stop area – including (but not limited to) benches, shelters, and lighting - results in less confusion for coach operators, passengers, and other users of the street right-of-way. Established, agreed-upon standards can also streamline the design of street improvements and the review of private development proposals. <i>(Connect Spokane, System Infrastructure Policy – 2.7.1 Design Standards for Bus Stop Areas)</i>

Service Policy	STA Definition
<p>Benches at Bus Stop</p>	<p>STA will ensure that benches are placed properly, designed adequately, and serve the needs of customers sufficiently.</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"> 1) 10 or more weekday average boardings 2) Transfer point between two or more routes 3) Adjacent to ridership generator with a high proportion of riders with limited mobility <p><i>(Connect Spokane, System Infrastructure Policy – 3.1 Benches)</i></p>
<p>Shelters and Awnings</p>	<p>The placement and maintenance of shelters or other weather cover for passenger waiting areas where appropriate shall be encouraged.</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 (ADA). Stops to have shelters funded by STA must meet at least one of the following criteria:</p> <ol style="list-style-type: none"> 1) 25 or more weekday average boardings 2) Transfer point between two or more routes 3) Adjacent to a ridership generator with a high proportion of riders with limited mobility. <p><i>(Connect Spokane, System Infrastructure Policy – 3.2.1 Placement and Maintenance)</i></p> <p>The removal of shelters may occur after a review of ridership data and/or physical condition.</p> <p>In the programmed shelter replacement plan, STA reviews bus stops with less than 10 boardings per day and considers those locations for shelter removal. STA will also review a shelter’s physical condition based on a point rating of the frame, roof, panels, bench, and the concrete foundation.</p> <p><i>(Connect Spokane, System Infrastructure Policy – 3.2.2 Removal)</i></p>

Service Policy	STA Definition
Lighting at Bus Stops	<p>STA works to provide pedestrian-scale lighting at stations, shelters, and general stops whenever possible.</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 streetlights. <i>(Connect Spokane, System Infrastructure Policy – 3.3 Lighting)</i></p>
Bicycle Facilities	<p>Bicycles, including bicycle share, shall be accommodated at STA’s facilities and on STA coaches.</p> <p>A good bicycle network and appropriate facilities are like a good pedestrian network and facilities. They can accompany transit to extend the range of non-motorized modes of transportation. By supporting bike share and bicycle ridership through short- and long-term bicycle parking, greater bicycle capacity racks on coaches, and other supportive efforts, STA can increase options for those who choose to travel by more than one mode. <i>(Connect Spokane, System Infrastructure Policy – 3.4 Bicycle Facilities)</i></p>
Vehicle Assignment	<p>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.</p> <p><i>(Connect Spokane, Transit Equity and Inclusion Policy – 4.6 Vehicle Assignment Service Policy)</i></p>

System-wide Service Standards

Table 9 below presents the system-wide service standards, which are quantitative performance standards meant to ensure that fixed route services are fairly distributed throughout STA’s service area.

Table 9: System-wide Service Standards

Service Standard	STA Definition																																							
On-time Performance	STA’s on-time performance objective is 93% or greater. (<i>Connect Spokane</i> , Transit Equity and Inclusion Policy – 4.10 On-Time Performance Standard)																																							
Vehicle Load	<table border="1" data-bbox="407 632 1406 1003"> <thead> <tr> <th data-bbox="407 632 610 741">Vehicle Type</th> <th data-bbox="610 632 810 741">Seated</th> <th data-bbox="810 632 1010 741">Standing</th> <th data-bbox="1010 632 1209 741">Total</th> <th data-bbox="1209 632 1406 741">Maximum Load Factor Ratio</th> </tr> </thead> <tbody> <tr> <td data-bbox="407 741 610 779">30’ Bus</td> <td data-bbox="610 741 810 779">26</td> <td data-bbox="810 741 1010 779">20</td> <td data-bbox="1010 741 1209 779">46</td> <td data-bbox="1209 741 1406 779">1.77</td> </tr> <tr> <td data-bbox="407 779 610 816">35’ Bus</td> <td data-bbox="610 779 810 816">32</td> <td data-bbox="810 779 1010 816">24</td> <td data-bbox="1010 779 1209 816">56</td> <td data-bbox="1209 779 1406 816">1.75</td> </tr> <tr> <td data-bbox="407 816 610 854">40’ Bus</td> <td data-bbox="610 816 810 854">39</td> <td data-bbox="810 816 1010 854">29</td> <td data-bbox="1010 816 1209 854">68</td> <td data-bbox="1209 816 1406 854">1.74</td> </tr> <tr> <td data-bbox="407 854 610 892">60’ Bus</td> <td data-bbox="610 854 810 892">62</td> <td data-bbox="810 854 1010 892">47</td> <td data-bbox="1010 854 1209 892">109</td> <td data-bbox="1209 854 1406 892">1.76</td> </tr> <tr> <td data-bbox="407 892 610 930">60’ BEB Bus</td> <td data-bbox="610 892 810 930">41</td> <td data-bbox="810 892 1010 930">31</td> <td data-bbox="1010 892 1209 930">72</td> <td data-bbox="1209 892 1406 930">1.76</td> </tr> <tr> <td data-bbox="407 930 610 1003">Double Decker Bus</td> <td data-bbox="610 930 810 1003">82</td> <td data-bbox="810 930 1010 1003">24</td> <td data-bbox="1010 930 1209 1003">106</td> <td data-bbox="1209 930 1406 1003">1.29</td> </tr> </tbody> </table> <p data-bbox="407 1003 1406 1041">(Connect Spokane, Fixed-Route Service Design Policy – 7.0 Vehicle Load Standards)</p>					Vehicle Type	Seated	Standing	Total	Maximum Load Factor Ratio	30’ Bus	26	20	46	1.77	35’ Bus	32	24	56	1.75	40’ Bus	39	29	68	1.74	60’ Bus	62	47	109	1.76	60’ BEB Bus	41	31	72	1.76	Double Decker Bus	82	24	106	1.29
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Service Standard	STA Definition																																								
Service Availability	<p>STA balances customer access, service reliability, and system performance when determining the spacing and placement of bus stops.</p> <table border="1" data-bbox="407 369 1414 1094"> <thead> <tr> <th data-bbox="407 369 581 443">Service Type</th> <th data-bbox="581 369 995 443">Spacing</th> <th data-bbox="995 369 1414 443">Process</th> </tr> </thead> <tbody> <tr> <td data-bbox="407 443 581 659">HPT</td> <td data-bbox="581 443 995 659">Generally greater spacing than regular service it is replacing with a target of ½ mile outside the downtown core. (Minimum spacing of ¼ mile between most stations.</td> <td data-bbox="995 443 1414 659">Developed as part of a corridor plan. General station locations are subject to formal board approval (not required for other stops).</td> </tr> <tr> <td data-bbox="407 659 581 1016">Regular</td> <td data-bbox="581 659 995 1016">Arterial and local streets: 800' – 1,500' seeking an average quarter mile stop spacing Highway environments where speed limits exceed 40 mph: minimum ½ mile and where activity centers and infrastructure will support Rural/Limited access: subject to suitable location</td> <td data-bbox="995 659 1414 1016">Implement as part of normal service development. No formal consultation process except for stop closure or major upgrades as part of integrated improvements.</td> </tr> <tr> <td data-bbox="407 1016 581 1094">Targeted</td> <td data-bbox="581 1016 995 1094">Subject to specialized service needs</td> <td data-bbox="995 1016 1414 1094">Same as Regular service</td> </tr> </tbody> </table> <p>(Connect Spokane, Fixed-Route Service Design Policy – 6.0 Stop Spacing and Placement)</p>	Service Type	Spacing	Process	HPT	Generally greater spacing than regular service it is replacing with a target of ½ mile outside the downtown core. (Minimum spacing of ¼ mile between most stations.	Developed as part of a corridor plan. General station locations are subject to formal board approval (not required for other stops).	Regular	Arterial and local streets: 800' – 1,500' seeking an average quarter mile stop spacing Highway environments where speed limits exceed 40 mph: minimum ½ mile and where activity centers and infrastructure will support Rural/Limited access: subject to suitable location	Implement as part of normal service development. No formal consultation process except for stop closure or major upgrades as part of integrated improvements.	Targeted	Subject to specialized service needs	Same as Regular service																												
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Targeted	Subject to specialized service needs	Same as Regular service																																							
Vehicle Headway	<p>STA shall adhere to maximum headway standards when determining a route's frequency.</p> <table border="1" data-bbox="407 1304 1414 1640"> <thead> <tr> <th colspan="5" data-bbox="407 1304 1414 1346">Maximum Headways (minutes)</th> </tr> <tr> <th data-bbox="407 1346 597 1377">Service Class</th> <th data-bbox="597 1346 1045 1377">Variable</th> <th data-bbox="1045 1346 1146 1377">Peak</th> <th data-bbox="1146 1346 1255 1377">Base</th> <th data-bbox="1255 1346 1414 1377">Sub-base</th> </tr> </thead> <tbody> <tr> <td data-bbox="407 1377 597 1493" rowspan="3">HPT</td> <td data-bbox="597 1377 1045 1419">Mode: Bus Rapid Transit</td> <td data-bbox="1045 1377 1146 1419">10</td> <td data-bbox="1146 1377 1255 1419">15</td> <td data-bbox="1255 1377 1414 1419">30</td> </tr> <tr> <td data-bbox="597 1419 1045 1461">Corridor Configuration: Urban</td> <td data-bbox="1045 1419 1146 1461">15</td> <td data-bbox="1146 1419 1255 1461">15</td> <td data-bbox="1255 1419 1414 1461">30</td> </tr> <tr> <td data-bbox="597 1461 1045 1493">Corridor Configuration: Regional</td> <td data-bbox="1045 1461 1146 1493">30</td> <td data-bbox="1146 1461 1255 1493">30</td> <td data-bbox="1255 1461 1414 1493">60</td> </tr> <tr> <td data-bbox="407 1493 597 1640" rowspan="4">Regular</td> <td data-bbox="597 1493 1045 1535">Service Family: Frequent</td> <td data-bbox="1045 1493 1146 1535">15</td> <td data-bbox="1146 1493 1255 1535">30</td> <td data-bbox="1255 1493 1414 1535">60</td> </tr> <tr> <td data-bbox="597 1535 1045 1577">Service Family: Standard</td> <td data-bbox="1045 1535 1146 1577">30</td> <td data-bbox="1146 1535 1255 1577">30</td> <td data-bbox="1255 1535 1414 1577">60</td> </tr> <tr> <td data-bbox="597 1577 1045 1619">Service Family: Basic</td> <td data-bbox="1045 1577 1146 1619">60</td> <td data-bbox="1146 1577 1255 1619">60</td> <td data-bbox="1255 1577 1414 1619">120</td> </tr> <tr> <td data-bbox="597 1619 1045 1640">Service Family: Downtown</td> <td data-bbox="1045 1619 1146 1640">30</td> <td data-bbox="1146 1619 1255 1640">30</td> <td data-bbox="1255 1619 1414 1640">60</td> </tr> </tbody> </table> <p>(Connect Spokane, Fixed-Route Service Design Policy – 4.0 Headways for HPT Service and Regular Service)</p>	Maximum Headways (minutes)					Service Class	Variable	Peak	Base	Sub-base	HPT	Mode: Bus Rapid Transit	10	15	30	Corridor Configuration: Urban	15	15	30	Corridor Configuration: Regional	30	30	60	Regular	Service Family: Frequent	15	30	60	Service Family: Standard	30	30	60	Service Family: Basic	60	60	120	Service Family: Downtown	30	30	60
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	Service Family: Downtown	30	30	60																																					

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 STA’s comprehensive plan *Connect Spokane*, which was last adopted in October 2024.

Table 10: System-wide Title VI Policies

Policy	STA Definition
System-Wide Title VI Policies	<p>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.”</p> <p>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.”</p> <p>(<i>Connect Spokane</i>, Transit Equity and Inclusion Policy – 4.0 Title VI Program Policies)</p>
Major Service Change Policies	<p>In developing annual plans and service changes, STA will assess whether changes meet the Major Service Change threshold. This threshold is as follows:</p> <ul style="list-style-type: none"> • Cost Impacts: More than 5.0% reduction in revenue hours of service in any calendar year • 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. <p>(<i>Connect Spokane</i>, Transit Equity and Inclusion Policy – 4.2 Major Service Change Policies)</p>
Service Change Disparate Impact Policy (minority)	<p>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.</p> <p>(<i>Connect Spokane</i>, Transit Equity and Inclusion Policy – 4.3 Service Change Disparate Impact Policy)</p>

Policy	STA Definition
Service Change Disproportionate Burden Policy (low-income)	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>(Connect Spokane, Transit Equity and Inclusion Policy – 4.4 Service Change Disproportionate Burden Policy)</i>
System-wide Transit Amenities Service Policy	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>(Connect Spokane, Transit Equity and Inclusion Policy – 4.5 System-wide Transit Amenities Service Policy)</i>
Vehicle Assignment Service Policy	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>(Connect Spokane, Transit Equity and Inclusion Policy – 4.6 Vehicle Assignment Service Policy)</i>
Fare Change Policy	STA evaluates fare changes to ensure fare increases do not disproportionately negatively impact a class protected under Title VI. <i>(Connect Spokane, Transit Equity and Inclusion Policy – 4.7 Fare Change Policy)</i>
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. <i>(Connect Spokane, Transit Equity and Inclusion Policy – 4.8 Fare Change Minority Disparate Impact Policy)</i>
Fare Change Low-Income Disproportionate Impact Policy	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>(Connect Spokane, Transit Equity and Inclusion Policy – 4.9 Fare Change Low-Income Disproportionate Impact Policy)</i>
On-Time Performance Standard	STA’s on-time performance objective is 93% or greater. <i>(Connect Spokane, Transit Equity and Inclusion Policy – 4.10 On-time Performance Standard)</i>

Section 9: Evaluation of 2023-2025 Service and Fare Changes

Summary of Major Service and Fare Changes Implemented since previous Title VI Update
 The following is a summary of the service and fare changes, and any associated equity analyses STA conducted for service or fare/fee changes implemented between March 2023 and December 2025.

Fare Changes

There has been one fare change implemented since the 2023 Title VI Program update. The implementation of a pilot low-income fare program was adopted in July 2025 by the STA Board of Directors. This policy revision underwent a Title VI impact analysis process in accordance with the FTA C 4702.1B and can be found in Appendix E.

Service Changes

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

Since August 2022, there has been one service change that met STA’s adopted major service change threshold and for which a Title VI impact analysis was conducted. The analysis was conducted in 2021 in advance of the anticipated City Line launch, originally scheduled for implementation 2022. Due to supply chain issues for City Line shelters, the project was shifted to a phased implementation for August 2022 and July 2023. The Service and Fare Equity (SAFE) Analysis can be found in Appendix E.

All other service changes have been minor and moderate service changes and route modifications. Per *Connect Spokane*, a Title VI analysis is not required for minor and moderate service changes. Table 11 below summarizes each of these service changes. Full descriptions of all changes are on file with the Planning Department.

Table 11: 2022-2025 Service Change Summary

Service Change	Overview of Service Changes
May 2022	Combined with August 2022
September 2022	Combined with August 2022
January 2023	Continued to refine the August 2022 Service Change by adding additional trips to address heavy passenger demand, especially on routes serving high schools in the afternoons, refine schedule reliability through timepoint adjustments, and changing a layover location for better restroom access for operators.
May 2023	Implemented minor routing and schedule adjustments, and stop placement changes on Routes 33, 61, and 90, and 96 as needed.
September 2023	Comprised of minor adjustments to routes and schedules primarily focused on timepoints and turnback movements.
January 2024	Comprised of minor adjustments to routes and schedules and an increase in service levels on City Line.
May 2024	Comprised of minor adjustments to routes and schedules and the final increase in service levels on City Line

Service Change	Overview of Service Changes
September 2024	Comprised of a number of service improvements and route adjustments including the introduction of new Routes 65 and 31, the re-route of Route 63, the implementation of HPT Route 9, increased frequency on Routes 94, 27 and 28, and the early implementation of increased service on weekends on Route 74. Routes 26 and 39 were discontinued in addition to other interline adjustments to routes and schedules
January 2025	Adjustment of peak periods for City Line and inclusion of bus bays for Mirabeau Transit Center in addition to the implementation of the new holiday service schedule, operating a Saturday service schedule for all STA contractually recognized holidays, except Thanksgiving, Christmas, and New Years Day.
May 2025	Routing adjustment to Route 11 and adjustments to the assigned bus sizes for several routes and trips to better match passenger demand with bus capacity
September 2025	Implementation of new HPT Route 7, plus new Routes 93 and 722. The discontinuation of Routes 60, 67, 74 and 172. Minor adjustments to other routes and schedules to create more effective connection opportunities across the network including the launch of double decker buses into service in Cheney.

Facility Site Equity Analysis

There were no facilities constructed that required land acquisition and the displacement of persons from their residences and businesses. Spokane Transit has purchased land on Union Road in Spokane Valley, and on University Road. Spokane Transit is also in the planning stages of acquiring land on Boone Avenue in Spokane. Equity analyses have been completed for these sites, and were selected without regard to race, color, or national origin.

Section 10: Monitoring Transit Service

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.

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

Vehicle Load

STA sets a maximum load factor for each of its fixed routes based on the size of the coach used, as noted in the previous section. Table 12 identifies the vehicle load factor at the peak ridership hour (from Automatic Passenger Count data) for each route. Minority routes are shaded yellow. All routes meet the performance standard, being well within the load factor capacity.

Table 12: Vehicle Load Factor at Peak Ridership Hour (December 2024)

Route	Observed Peak Hour Load Factor	Max Load Factor
1	0.3	1.76
4	0.6	1.74
6	0.5	1.76
9	0.6	1.74
11	0.1	1.75
12	0.3	1.75
14	0.3	1.74
20	0.2	1.74
21	0.2	1.74
22	0.3	1.74
23	0.5	1.74
25	0.4	1.76
27	0.5	1.74
28	0.7	1.74
31	0.3	1.74
32	0.3	1.74
33	0.6	1.74
34	0.2	1.74

Route	Observed Peak Hour Load Factor	Max Load Factor
35	0.3	1.74
36	0.5	1.74
43	0.5	1.74
45	0.4	1.74
60	0.5	1.74
61	0.8	1.74
62	0.1	1.74
63	0.7	1.74
65	0.2	1.74
66	0.6	1.76
67	0.2	1.74
68	0.3	1.74
74	0.3	1.76
94	0.4	1.74
95	0.2	1.74
96	0.2	1.74
97	0.3	1.74
98	0.2	1.74
124	0.3	1.74
144	0.6	1.74
172	0.3	1.74
173	0.3	1.74
190	0.3	1.74
223	0.8	1.76
247	0.3	1.74
294	0.9	1.74
633	1.2	1.74
661	0.4	1.76
662	0.6	1.76
663	0.5	1.76
664	0.5	1.76
724	0.2	1.74
771	0.1	1.74

Vehicle Headway

All STA routes meet the minimum headway standards as shown in the previous section. Based on STA's headway standards, five of the six Frequent Routes in the STA system as of December 2024 (83%) are identified as both minority and low-income routes.

On-Time Performance

STA's on-time performance objective is 93% or greater. A report was run using the On Time Performance module in STA's Structured Query Language (SQL) software program for all service days in 2024. Table 13 shows the on-time performance for every route in STA's system in 2024, as well as their

minority and low-income percentage (highlighted cells indicate those figures are above the baseline figure). In 2024, only 53% of all routes met the on-time performance goal over the entire year. An additional 13% of the routes were on-time 90% of the time or better. It should be noted that 2024 was a particularly impactful year for road construction projects throughout the PTBA. The delays associated with construction forced bus detours are out of STA’s control. These detours can severely impact on-time performance.

Table 13: On-time Performance (2024)

Route	On-time %	Minority %	Low-income %
1	83.8%	24.5%	32.4%
4	91.5%	18.2%	17.1%
6	95.6%	24.2%	29.3%
9	84.1%	22.8%	32.3%
11	91.5%	23.2%	42.9%
12	96.3%	15.2%	32.4%
14	98.7%	25.2%	25.2%
20	94.1%	20.5%	26.9%
21	95.2%	25.3%	27.2%
22	96.6%	18.9%	18.1%
23	89.9%	16.8%	13.7%
25	85.5%	21.5%	22.4%
27	91.5%	18.9%	17.5%
28	84.5%	21.5%	23.1%
31	93.1%	22.2%	18.0%
32	83.9%	14.1%	15.9%
33	84.5%	20.0%	14.8%
34	87.3%	20.9%	10.7%
35	95.0%	19.7%	15.2%
36	92.7%	20.4%	28.0%
43	89.9%	19.2%	14.0%
45	95.2%	14.9%	26.3%
60	95.4%	23.1%	21.5%
61	83.2%	28.5%	21.8%
62	97.7%	20.9%	17.5%
63	95.9%	21.5%	6.2%
65	98.5%	32.8%	17.7%
66	94.7%	24.7%	25.7%
67	97.1%	25.5%	36.4%
68	96.8%	24.7%	35.6%
74	89.0%	16.8%	22.3%
94	87.9%	16.9%	22.2%
95	88.8%	15.8%	16.3%
96	92.2%	15.5%	15.8%
97	88.2%	15.7%	9.1%
98	92.1%	17.5%	16.7%
124	94.6%	18.5%	17.5%

Route	On-time %	Minority %	Low-income %
144	92.9%	14.6%	12.2%
172	89.2%	16.6%	21.4%
173	93.5%	19.7%	26.7%
190	94.4%	21.1%	29.5%
223	81.3%	14.6%	10.1%
247	88.4%	19.1%	19.7%
294	93.0%	21.0%	12.0%
342	99.8%	19.0%	13.5%
343	93.6%	19.4%	13.7%
633	98.7%	22.9%	20.4%
661	97.2%	25.7%	23.5%
662	97.2%	20.1%	17.0%
663	93.4%	23.2%	26.1%
664	96.3%	20.0%	17.0%
724	96.2%	17.1%	22.4%
771	89.4%	18.9%	26.7%

There are ongoing 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 2024 population estimates provided by the Washington State Office of Financial Management Small Area Estimate program, STA is currently meeting this standard. See Table 14 below.

Table 14: PTBA Urban Population within ½ mile of a bus stop

Service Accessibility	
2024 urban population within ½ mile of an STA bus stop	379,460
2024 urban PTBA population	462,487
Percent	82%

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, TEI – 4.6 Vehicle Assignment Service Policy). The following guidelines assist in assigning vehicle equipment to the appropriate route and/or trips:

- Small 29’ – 35’ Vehicles: Operate for lower ridership routes that do not require additional capacity. Vehicles can also be used to accommodate street design in a safe and effective

manner.

- Standard 40' Vehicles: Typical fleet vehicle in use. Allows for appropriate capacity on nearly all routes.
- Articulated 60' Vehicles: Operate along educational-focused routes (Cheney service, routes serving high schools) or corridors that warrant additional capacity. Street design must allow for larger vehicle size; however, articulated coaches generally have the same turning radius as 40' vehicles.
- Double Decker Vehicles: Introduced to the fleet for routes serving Cheney, however ridership data is not available for assignment.

All vehicle assignments are consistent with STA's vehicle assignment policy. Vehicles are assigned to operational blocks that incorporate interlining, which means most vehicles will be used on multiple routes during the course of a service day. STA also has a policy that all coaches shall accommodate bicycles. All coaches are outfitted with a 3-bicycle rack on the front of the vehicle.

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 transfer 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." STA follows this policy, and every active stop (with the exception of temporary stops) have a post indicating the physical location of the stop, with an attached sign that indicates: the agency name and logo, the route name and number, the stop number that can be used to text from cell phones to obtain real time arrival information, 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 (see Figure 3). STA makes recommendations to the jurisdictions

about bench placement but does not maintain and monitor the condition. STA also does not empty trash cans from these sites.

Figure 3: Bus stop bench



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

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 right of way available to construct the concrete pad on which the shelter will be placed as well as 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.

At the end of 2024, STA had 1,709 bus stops in service. All transit centers and park & ride lots offer passenger shelters in addition to 159 other bus stops throughout the system where ridership conditions warrant. STA operates 14 park & ride locations within the service area. Eight are either owned or leased by STA while the remaining four are made possible by cooperative agreement. Approximately 60.5% of passenger boardings in 2024 occurred at a stop or facility where a shelter is provided to customers.

Stops that warrant a shelter are monitored as part of the Annual Performance Report completed in April of every year. See Figure 4 on next page for example of STA shelter.

Figure 4: Bus stop shelter



Section 11: STA Board and Committees

Overview

In addition to the Board of Directors, STA has one 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, the membership of which are selected by STA. In addition to this, STA must include a description of the process the agency uses to encourage participation of minorities on such committees.

STA Board of Directors

The Board of Directors provides the policy and legislative direction for STA 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. Additionally, there are four non-voting elected officials from area small cities, and one non-voting STA labor representative, for a total of 14 board members.

Citizen Advisory Committee

STA’s Citizen Advisory Committee (CAC) is comprised of members of the public who are residents of Spokane County. The purpose of this committee 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 and act as a focused, educated forum for public input and feedback to the organization and represent a wide range of stakeholders and transit service employees. STA advertises open positions for the CAC in its newsletter, social media, and on the STA website. The STA Board of Directors expects CAC members to educate the public about STA services as much as possible. To this end, during the membership selection process, weighted value will be given to those who are active participants in other area organizations such as non-profits. This includes organizations that serve minority populations. Table 15 shows the minority composition of this committee.

Executive Committee

The Executive Committee serves as a regional leadership group representing the interests of their agencies while advancing the delivery of Division Street BRT. They deliberate based on established values and outcomes, data, and public input to make recommendations about the project and programs. The Committee is made up of agency staff members in leadership roles to facilitate major decisions, resolve significant conflicts, facilitate and sign agreements, and adjudicate Technical Advisory Committee disagreements, share feedback from agency stakeholders and support outreach efforts of the project. Membership is voluntary.

Table 15: Non-Elected Committees Minority Composition

Committee	Minority	Non-Minority
Citizen Advisory Committee	2	9

Appendices

Appendix	Title
A	Downloadable Complaint Forms
B	Rider Census Survey Instrument
C	Provider Survey Instrument
D	Targeted Outreach Report
E	Equity Analyses
F	Resolution

Appendix A: Downloadable Complaint Forms

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by an STA employee may file a Title VI complaint by completing and submitting the official Title VI Complaint Form provided on STA's website. Complaint forms in English, as well as other identified languages, are available upon request or online at : <https://www.spokanetransit.com/projects/title-vi-non-discrimination-policy-and-program/>

English: https://www.spokanetransit.com/wp-content/uploads/2023/08/20230815-Title-VI-Complaint-Form_English.pdf

Spanish: https://www.spokanetransit.com/wp-content/uploads/2023/08/20230815-Title-VI-Complaint-Form_Spanish.pdf

Russian: https://www.spokanetransit.com/wp-content/uploads/2023/08/20230815-Title-VI-Complaint-Form_Russian.pdf

Vietnamese: https://www.spokanetransit.com/wp-content/uploads/2023/08/20230815-Title-VI-Complaint-Form_Vietnamese.pdf

Ukrainian: https://www.spokanetransit.com/wp-content/uploads/2025/10/Title-VI-Complaint-Form_Ukrainian.pdf

Marshallese: https://www.spokanetransit.com/wp-content/uploads/2025/10/en_mh_Title-VI-Complaint-Form_Marshallese.pdf

Arabic: https://www.spokanetransit.com/wp-content/uploads/2023/08/20230815-Title-VI-Complaint-Form_Arabic.pdf

Title VI Complaint Form



Spokane Transit Authority (STA) does not discriminate in the provision of service on the basis of race, color, or national origin. Any person who believes STA has discriminated against him or her on the basis of race, color, or national origin may file a complaint using this form. STA does not investigate complaints received more than 180 days after the alleged incident.

For more information on STA's commitment to nondiscrimination, or to request a copy of this form in an alternative format due to a disability, contact the STA Ombudsman:

STA Ombudsman
Spokane Transit
1230 W. Boone Ave.
Spokane, WA 99201
(509) 325-6094 (TTY Relay 711)
ombudsman@spokanetransit.com

(Please Type or Print Clearly)

1. Complainant's Name: _____

2. Address: _____

3. City, State, Zip Code: _____

4. Phone: _____ Email: _____

5. Are you the Complainant? Yes No

If no, your name: _____

Relationship to the Complainant: _____

Phone: _____ Email: _____

Does the Complainant know you are filing this complaint? Yes No

6. Which of the following best describes the reason you believe the discrimination took place?

Was it because of your:

Race

Color

National Origin

7. The date the alleged discrimination took place: _____

Title VI Complaint Form



8. In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please attach additional paper if needed.

9. Please give the name, mailing address, and telephone number for anyone who witnessed the alleged discrimination.

10. Have you filed this complaint with any other agency or court? Yes No

If yes, provide the name, address, and phone number of the contact person at the other agency/court: _____

Complainant's Signature _____ Date _____

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

Return the completed form and any additional materials to:

**STA Ombudsman
Spokane Transit**
1230 W. Boone Ave.
Spokane, WA 99201
(509) 325-6094 (TTY Relay 711)
ombudsman@spokanetransit.com

Formulario de denuncia en virtud del Título VI



Spokane Transit Authority (STA) no discrimina a la hora de prestar servicios por motivos de raza, color o nacionalidad. Cualquier persona que considere que la STA la ha discriminado por motivos de raza, color o nacionalidad puede presentar una denuncia mediante este formulario. La STA no investiga las denuncias recibidas en un plazo superior a 180 días desde el presunto incidente.

Para obtener más información sobre el compromiso de la STA de no discriminar, o para solicitar una copia de este formulario en un formato alternativo debido a una discapacidad, póngase en contacto con la Defensoría del Pueblo de la STA:

STA Ombudsman
Spokane Transit
1230 W. Boone Ave.
Spokane, WA 99201
(509) 325-6094 (TTY Relay 711)
ombudsman@spokanetransit.com

(Típee o escriba en letra de imprenta con claridad)

1. Nombre del denunciante: _____

2. Dirección: _____

3. Ciudad, Estado, Código postal: _____

4. Teléfono: _____ Correo electrónico: _____

5. ¿Usted es el denunciante? Sí No

Si no lo es, escriba su nombre: _____

Relación con el denunciante: _____

Teléfono: _____ Correo electrónico: _____

¿El denunciante sabe que usted está presentando esta denuncia? Sí No

6. ¿Cuál de las siguientes opciones describe mejor el motivo por el que cree que se produjo la discriminación? Se produjo debido a motivos de:

- Raza
- Color
- Nacionalidad

Formulario de denuncia en virtud del Título VI



7. Fecha en la que se produjo la presunta discriminación: _____

8. Describa con sus propias palabras la presunta discriminación. Explique qué ocurrió y quién cree que fue el responsable. Adjunte más hojas si es necesario.

9. Proporcione el nombre, la dirección postal y el número de teléfono de cualquier persona que haya sido testigo de la presunta discriminación.

10. ¿Ha presentado esta denuncia ante algún otro organismo o tribunal? Sí No

Si es así, proporcione el nombre, la dirección y el número de teléfono de la persona de contacto del otro organismo o tribunal: _____

Firma del denunciante _____ Fecha _____

Puede adjuntar cualquier material escrito u otra información que considere pertinente para su denuncia.

Devuelva el formulario completado y cualquier material adicional a:

**STA Ombudsman
Spokane Transit**
1230 W. Boone Ave.
Spokane, WA 99201
(509) 325-6094 (TTY Relay 711)
ombudsman@spokanetransit.com

Форма жалобы в соответствии с разделом VI закона «О гражданских правах»

При предоставлении услуг организация Spokane Transit Authority (STA) не допускает дискриминации по признаку расы, цвета кожи или национального происхождения. Любое лицо, считающее, что STA дискриминирует его или ее по какому-либо из указанных выше признаков, может подать жалобу, заполнив эту форму. STA не расследует жалобы, полученные более чем через 180 дней после предполагаемого инцидента.

Чтобы получить дополнительную информацию об обязательствах STA относительно отсутствия дискриминации или запросить копию этой формы в другом формате в связи с особыми потребностями, обратитесь к омбудсмену STA, воспользовавшись контактными данными ниже.

STA Ombudsman
Spokane Transit
1230 W. Boone Ave.
Spokane, WA 99201
(509) 325-6094 (TTY Relay 711)
ombudsman@spokanetransit.com

(Заполните поля разборчиво.)

1. Имя и фамилия заявителя: _____
2. Адрес: _____
3. Город, штат, почтовый индекс: _____
4. Номер телефона: _____ Эл. почта: _____

5. Вы заявитель? Да Нет
Если нет, ваши имя и фамилия: _____
Кем вы приходите к заявителю: _____
Номер телефона: _____ Эл. почта: _____
Заявитель знает, что вы заполняете эту форму жалобы? Да Нет

6. Какая из перечисленных ниже причин, по вашему мнению, связана с произошедшим актом дискриминации? Акт дискриминации произошел по следующему признаку:
 Раса
 Цвет кожи
 Национальное происхождение

7. Дата предполагаемого акта дискриминации: _____

Форма жалобы в соответствии с разделом VI закона «О гражданских правах»

8. Опишите предполагаемый акт дискриминации своими словами. Объясните, что произошло и кого вы считаете виновным. При необходимости приложите дополнительные документы.

9. Укажите имя, почтовый адрес и номер телефона любого человека, который стал свидетелем предполагаемого акта дискриминации.

10. Подавали ли вы эту жалобу в какое-либо другое учреждение или суд? Да Нет

Если да, укажите имя и фамилию, адрес и номер телефона контактного лица в другом учреждении/суде: _____

Подпись заявителя _____ Дата _____

Вы можете приложить любые письменные материалы или другую информацию, которая, по вашему мнению, имеет отношение к жалобе.

Отправьте заполненную форму и любые дополнительные материалы по адресу:

**STA Ombudsman
Spokane Transit**
1230 W. Boone Ave.
Spokane, WA 99201
(509) 325-6094 (TTY Relay 711)
ombudsman@spokanetransit.com

Mẫu Đơn Khiếu Nại Tiêu Đề VI Spokane Transit

Spokane Transit Authority (STA) không phân biệt đối xử trong việc cung cấp dịch vụ trên cơ sở chủng tộc, màu da hoặc nguồn gốc quốc gia. Bất kỳ người nào tin rằng STA đã phân biệt đối xử với mình dựa trên chủng tộc, màu da hoặc nguồn gốc quốc gia có thể nộp đơn khiếu nại bằng mẫu đơn này. STA không điều tra các khiếu nại nhận được hơn 180 ngày sau khi xảy ra sự cố cáo buộc.

Để biết thêm thông tin về cam kết không phân biệt đối xử của STA, hoặc để yêu cầu bản sao mẫu đơn này ở định dạng khác do tình trạng khuyết tật, xin hãy liên hệ với STA Ombudsman:

STA Ombudsman
Spokane Transit
1230 W. Boone Ave.
Spokane, WA 99201
(509) 325-6094 (TTY Relay 711)
ombudsman@spokanetransit.com

(Vui lòng Đánh máy hoặc Viết chữ in rõ ràng)

1. Tên của Người khiếu nại: _____
2. Địa chỉ: _____
3. Thành phố, Tiểu bang, Mã Zip: _____
4. Điện thoại: _____ Email: _____
5. Quý vị có phải là Người khiếu nại không? Có Không
Nếu không, tên của quý vị: _____
Mối quan hệ với Người khiếu nại: _____
Điện thoại: _____ Email: _____
Người khiếu nại có biết quý vị đang nộp đơn khiếu nại này không? Có Không
6. Điều nào sau đây mô tả đúng nhất lý do quý vị tin rằng đã diễn ra tình trạng phân biệt đối xử? Đó có phải là vì:
 Chủng tộc
 Màu da
 Nguồn gốc quốc gia
7. Ngày diễn ra phân biệt đối xử cáo buộc: _____

Mẫu Đơn Khiếu Nại Tiêu Đề VI Spokane Transit

8. Bằng lời lẽ của quý vị, hãy mô tả trường hợp phân biệt đối xử cáo buộc. Giải thích những việc đã xảy ra và người mà quý vị tin rằng chịu trách nhiệm. Vui lòng đính kèm thêm trang giấy nếu cần.

9. Vui lòng nêu tên, địa chỉ gửi thư và số điện thoại của bất kỳ người nào chứng kiến vụ việc phân biệt đối xử cáo buộc.

10. Quý vị có nộp đơn khiếu nại này với bất kỳ cơ quan nào khác hay tòa án không?

Có Không

Nếu có, cung cấp tên, địa chỉ và số điện thoại của người liên hệ tại cơ quan khác/tòa án:

Chữ ký của Người khiếu nại _____ Ngày _____

Quý vị có thể kèm theo bất kỳ tài liệu văn bản hoặc thông tin nào khác mà quý vị cho rằng liên quan đến việc khiếu nại của quý vị.

Hãy gửi lại mẫu đơn hoàn chỉnh và bất kỳ tài liệu bổ sung nào đến:

**STA Ombudsman
Spokane Transit**
1230 W. Boone Ave.
Spokane, WA 99201
(509) 325-6094 (TTY Relay 711)
ombudsman@spokanetransit.com

Title VI Complaint Form

(Форма скарги на недотримання положень розділу VI)

У Spokane Transit Authority (STA) заборонена дискримінація під час надання послуг за ознакою раси, кольору шкіри й національного походження. Якщо ви вважаєте, що зазнаєте дискримінації з боку співробітників STA за ознакою раси, кольору шкіри або національного походження, ви можете подати скаргу за допомогою цієї форми. У STA не розглядають скарги, отримані через більш як 180 днів після інциденту, про який ви повідомляєте.

Щоб дізнатися більше про зобов'язання STA щодо заборони дискримінації або отримати копію цієї форми в іншому форматі у зв'язку з обмеженими можливостями, зверніться до STA Ombudsman:

STA Ombudsman
Spokane Transit
1230 W. Boone Ave.
Spokane, WA 99201
(509) 325-6094 (служба ретрансляції телетайп: 711)
ombudsman@spokanetransit.com

(Надрукуйте або розбірливо напишіть від руки друкованими літерами.)

1. Ім'я подавача скарги: _____

2. Адреса: _____

3. Місто, штат, поштовий індекс: _____

4. Телефон: _____ Адреса ел. пошти: _____

5. Ви подаєте скаргу від свого імені? Так Ні

Якщо ні, зазначте своє ім'я: _____

Ким для вас є постраждала особа? _____

Телефон: _____ Адреса ел. пошти: _____

Чи знає постраждала особа, що ви надсилаєте цю скаргу? Так Ні

6. Яка із зазначених нижче ознак, на вашу думку, стала причиною дискримінації?

Виберіть потрібний варіант:

Раса

Колір шкіри

Національне походження

7. Дата інциденту, пов'язаного з дискримінацією, про який ви повідомляєте: _____

Title VI Complaint Form

(Форма скарги на недотримання положень розділу VI)

8. Опишіть прояв дискримінації, про який ви хочете повідомити, власними словами. Поясніть, що сталося, і зазначте, хто, на вашу думку, несе відповідальність за порушення. У разі потреби прикріпіть додатковий аркуш.

9. Зазначте імена, поштові адреси й номери телефонів осіб, які були свідками прояву дискримінації, про який ви повідомляєте.

10. Чи подали ви цю скаргу до іншої установи або суду?

Так

Ні

Якщо так, зазначте ім'я, адресу й номер телефону контактної особи цієї установи/суду:

Підпис подавача скарги _____ Дата _____

У разі потреби вкладіть будь-які письмові матеріали або інші відомості, які, на вашу думку, стосуються цієї скарги.

Надішліть заповнену форму й наявні додаткові матеріали на адресу:

STA Ombudsman
Spokane Transit
1230 W. Boone Ave.
Spokane, WA 99201
(509) 325-6094 (служба ретрансляції телетайп: 711)
ombudsman@spokanetransit.com

Title VI Pepa in Kwalok Abņōņō



Spokane Transit Authority (STA) ejjab kalijeklok ilo an lelok jerbal pedped ion ia eo juon armej ej itok jen e, kōlar in kil, ak ia eo baamle eo an armej eo ej itok jen e. Jabdewōt armej eo ej tōmak STA eaar kalijeklok nae pedped ion ia eo juon armej ej itok jen e, kōlar in kil, ak ia eo baamle eo an armej eo ej itok jen e emaroņ bael abņōņō ilo an kōjerbale pepa in. STA ejjab etaale abņōņō ko rej tōprak eloņ lak jen 180 raan elikin jiriļok eo.

Ñan elaplok meļeļe ikkijen kallimur eo an STA ñan an ejelok kalijeklok, ak ñan kajjitōk juon kape in pepa in ilo juon bar waween jen wōt juon utaņwe, kepāake STA Ombudsman:

STA Ombudsman
Spokane Transit
1230 W. Boone Ave.
Spokane, WA 99201
(509) 325-6094 (TTY Relay 711)
ombudsman@spokanetransit.com

(Jouj Taib ak Jeje ilo an Alikkar)

1. Etan Armej eo ej Kwalok Abņōņō: _____

2. Atōrej: _____

3. Kiaptōl, State, Zip Code: _____

4. Talboon: _____ Email: _____

5. Kwoj ke armej eo ej Kwalok Abņōņō? Aet Jab

Elaņe jab, etan: _____

Kadkad eo am ñan Armej eo ej Kwalok Abņōņō: _____

Talboon: _____ Email: _____

Armej eo Kwoj Kwalok Abņōņō kake ejellā ke kōn am bael e abņōņō in? Aet Jab

6. Ewi iaan laajrak kein ej kōmeļeļe wūnin am tōmak an kar wōr kalijeklok?

Ej ke jen:

Ia eo kwoj itok jen e

Kōlar in kil

Ia eo baamle eo am rej itok jen e

7. Raan eo kalijeklok eo eaar waļok: _____

Title VI Pepa in Kwalok Abņōņō



8. Ilo naan ko am māke, kōmelele ki kalikjeklok eo eaar walok. Kwalok ta eo eaar waļok im wōn eo kwoj tōmak eaar bōk eddo. Jouj kobaiki eloņļok pepa elaņe aikuļ.

9. Jouj leļok et, atōrej in mael, im talboon nōmba an jabdewōt eo eaar kamooļ kalikjeklok eo eaar walok.

10. Emōj am ke bael abņōņō in ippān juon bar agency ak mōn ekkajet? Aet Jab

Elaņe aet, lelok et, atōrej, im talboon nōmba in armeļ eo ñan kepāake ilo
agency/mōn ekkajet eo: _____

Jikin Jain an Armej eo ej Kwalok Abņōņō _____ Raan _____

Kwomaroņ kobaiki jabdewōt bar jeje ak melele ko kwoj ļōmnak ekkar ñan abņōņō eo am.

Karool pepa eo ededelok kanne im jabdewōt bar jermal ko ñan:

**STA Ombudsman
Spokane Transit**
1230 W. Boone Ave.
Spokane, WA 99201
(509) 325-6094 (TTY Relay 711)
ombudsman@spokanetransit.com

لا تقوم Spokane Transit Authority (STA، هيئة سبوكان للنقل) بالتمييز في تقديمها للخدمة على أساس العرق، واللون، والأصل القومي. ويجوز لأي شخص يعتقد بأن STA قد مارست التمييز ضده على أساس العرق، أو اللون، أو الأصل القومي تقديم شكوى باستخدام هذا النموذج. لا تحقق STA في الشكاوى الواردة بعد مرور أكثر من 180 يومًا على وقوع الحادث المزعوم.

للحصول على مزيد من المعلومات بشأن التزام STA بعدم ممارسة التمييز، أو لطلب نسخة من هذا النموذج بتنسيق بديل بسبب الإعاقة، تواصل مع أمين التظلمات في STA:

STA Ombudsman
Spokane Transit
1230 W. Boone Ave.
Spokane, WA 99201
(509) 325-6094 (TTY Relay 711)
ombudsman@spokanetransit.com

(الرجاء الكتابة أو الطباعة بوضوح)

1. اسم مقدم الشكوى: _____
2. العنوان: _____
3. المدينة، الولاية، الرمز البريدي: _____
4. الهاتف: _____ البريد الإلكتروني: _____
5. هل أنت مقدم الشكوى؟ نعم لا
إذا كانت الإجابة «لا»، فاذكر اسمك: _____
صلة القرابة بمقدم الشكوى: _____
الهاتف: _____ البريد الإلكتروني: _____

هل يعلم مقدم الشكوى أنك تقدم هذه الشكوى؟ نعم لا

6. أيُّ مما يلي يُعد في رأيك السبب الرئيسي وراء حدوث التمييز؟ هل كان ذلك بسبب:
 العرق
 اللون
 الأصل القومي

7. تاريخ حدوث التمييز المزعوم: _____

8. صِف بأسلوبك الخاص حادثة التمييز المزعوم. اشرح ما حدث، واذكر الشخص الذي تعتقد أنه المسؤول عن وقوع الحادثة. يُرجى إرفاق وثائق إضافية إذا لزم الأمر.

9. يُرجى ذكر الاسم، وعنوان البريد العادي، ورقم الهاتف الخاص بأي شخص كان شاهداً على حادثة التمييز المزعوم.

10. هل قدّمت هذه الشكوى إلى أي وكالة أو محكمة أخرى؟ نعم لا

إذا كانت الإجابة «نعم»، فاذكر الاسم، والعنوان، ورقم هاتف الشخص الذي يمكن التواصل معه في

الوكالة/المحكمة الأخرى:

توقيع مقدم الشكوى _____ التاريخ _____

يمكنك إرفاق أي مواد مكتوبة أو غيرها من المعلومات التي تعتقد أنها ذات صلة بشكواك.

تُرجى إعادة النموذج المكتمل وأي مواد إضافية إلى:

STA Ombudsman

Spokane Transit

1230 W. Boone Ave.

Spokane, WA 99201

(509) 325-6094 (TTY Relay 711)

ombudsman@spokanetransit.com

Appendix B: Rider Census Instrument

What route are you on: _____






What time of day is it: _____

Date: _____

2025 Rider Census

As part of Spokane Transit Authority's (STA) Title VI Nondiscrimination Program requirements, we are requesting riders to complete a short demographic questionnaire. The information collected will be used to better understand our riders and community. The information you provide is anonymous and the data cannot be linked to specific individuals.

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

1. What did you use for your bus fare?
 - a. Connect card, e-Connect card
 - b. Cash
 - c. Paper Pass (answer question 2)
 - d. University ID
 - e. Other (please specify)
2. If you used a paper pass today, what type of pass did you use? Please select from the photo if unsure or remember that you tap Connect and swipe/insert Legacy passes.
 - a. Connect 1-ride (two-hour pass)

 - b. Ticket Vending Machine pass

 - c. Connect Day pass

 - d. Connect 7-day pass

 - e. Legacy 31-day pass

3. Did you use a reduced fare (student, stars and stripes, honored rider, rider's license)?
 - a. Yes
 - b. No
4. What bus route(s) do you ride? (please list)
 - a.
5. Where did you start your current trip? (list cross streets/City/Destination)
 - a.
6. Where will you end your current trip? (list cross streets/City/Destination)
 - a.
7. Where are you going on this bus trip?
 - a. Home
 - b. Work/Work-related
 - c. School/College
 - d. Errands (shopping, medical appointments, groceries, etc.)
 - e. Recreation (visiting family or friends, sports events, parks, libraries, etc.)
 - f. Other (please specify)
8. How did you get to and from the bus stop?
 - a. Walked
 - b. Biked
 - c. Rode scooter
 - d. Dropped off
 - e. Drove to Park & Ride
 - f. Transferred from another route (please identify)
 - g. Other (please specify)
9. Where did you purchase your fare or pass?
 - a. On the bus
 - b. Fare Free
 - c. Online
 - d. Retail/Grocery Store
 - e. Transit Center/Station
 - f. Someone else purchased it for me
 - i. If so, who:
 - g. Other (please explain)
10. How do you self-identify by race?
 - a. White or Caucasian
 - b. Black or African American
 - c. Asian or Asian American
 - d. American Indian or Alaskan native
 - e. Native Hawaiian or Pacific Islander
 - f. Two or more races
 - g. Other

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>

What route are you on: _____

What time of day is it: _____

Date: _____

11. Gender (select all that apply)

- a. Woman
- b. Man
- c. Prefer not to say

12. What is your age?

- a. Under 18
- b. 18-24
- c. 25-34
- d. 35-44
- e. 45-54
- f. 55-64
- g. 65+

13. What is the primary language spoken in the household?

- a. English
- b. Spanish
- c. Vietnamese
- d. Russian
- e. Chinese
- f. German
- g. Korean
- h. Tagalog
- i. Other (please specify)

14. How would you describe your ability to speak English?

- a. Very well
- b. Well
- c. Not well
- d. Not at all

15. How many people are in your household (including yourself)?

- a.

16. Employment Status

- a. Full-time
- b. Part-time
- c. Unemployed

17. Education Level

- a. Less than High School
- b. High School Diploma/GED
- c. Some College/associate degree
- d. Bachelor's Degree
- e. Graduate/Professional Degree
- f. Prefer not to say

18. What is your current (annual) household income (best guess is okay)?

- a. Less than \$15,649
- b. \$15,650 – \$21,149
- c. \$21,150 – \$26,649
- d. \$26,650 – \$32,149
- e. \$32,150 – \$37,649
- f. \$37,650 – \$43,149
- g. \$43,150 – \$48,649
- h. \$48,650 – \$54,149
- i. \$54,150 – \$64,999
- j. \$65,000 – \$74,999
- k. \$75,000 – \$84,999
- l. \$85,000 – \$119,999
- m. Over \$120,000
- n. Don't Know
- o. Prefer not to answer

19. Do you have a disability that affects your mobility or ability to navigate?

- a. Yes
- b. No

20. Do you have ready access to a personal vehicle for transportation?

- a. Yes
- b. No

21. Do you have access to electronic payment options?

- a. Yes
- b. No

22. Do you have access to a smart phone?

- a. Yes
- b. No

23. How do you access the internet?

- a. Personal data plan
- b. Public Wi-Fi
- c. No regular access
- d. Other

Thank you for your Participation!

To enter the drawing for a chance to win one of two 31-day passes, please submit your contact information to your survey collector. **The contact information is NOT linked to survey responses.**

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>

Appendix C: Provider Survey Instrument

2025 Provider Survey

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 or reading 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>

Instructions: Please answer all questions to the best of your ability. Your responses will be kept confidential and used solely for the purpose of improving Spokane Transit's services.

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.*

Section 1: Organization Information

1. Organization Name:
2. Your Name:
3. Your Title:
4. Contact Information:
 - a. Address:
 - b. City/Town:
 - c. State:
 - d. Zip/Postal Code:
 - e. Email Address:
 - f. Phone Number:

5. What is your organization's primary mission or focus? (Select all that apply)
- Community Advocacy/Engagement
 - Disability Services
 - Education/Youth Programs
 - Employment/Workforce Development
 - Food Security
 - Healthcare Access
 - Housing/Homelessness
 - Immigrant/Refugee Services
 - Senior Services
 - Other (Please specify):
6. What populations does your organization primarily serve? (Select all that apply)
- Individuals seeking housing
 - Individuals with disabilities
 - Low-income individuals/families
 - Racial/ethnic minority groups
 - Seniors
 - Youth/Children
 - Other (Please specify):
7. Which neighborhoods or areas does your organization primarily serve?

Section 2: Minorities and Limited/Non-English Speaking Individuals

8. Do you work for an organization that serves minority groups and/or limited or non-English speaking or reading individuals?
- a. Yes
 - b. No

9. Estimate how many clients per month are limited in their ability to speak or read English.
 - a. 1-9
 - b. 10-19
 - c. 20-29
 - d. 30-49
 - e. 50+

10. What is your best guess for the primary languages spoken by the non or limited English speaking individuals your organization serves per month?

Language	Clients Served				
	1-9	10-19	20-29	30-49	50+
Spanish					
Russian					
Vietnamese					
Arabic					
Chinese					
Ukrainian					
Marshallese					
Bosnian					
Burmese					
Farsi					
French					
Greek					
Hmong					
Karen					
Kinyarwanda					
Kirundi					
Korean					
Moldovan					
Nepali					
Somali					
Swahili					
Thai					

11. Did we miss any languages that you serve? Please specify the language and how many clients you serve that speak or read that language.

12. Do you provide translated materials to the individuals you serve? If so, what languages are most needed?
13. How often do the clients you serve rely on transit service?
- Once a month or less
 - A few days per month
 - Once per week
 - 2-4 days per week
 - 5-7 days per week
14. Do your limited or non-English speaking or reading clients have trouble using transit?
- a. Yes
 - b. No
15. If yes, please explain why and how we can make transit easier for individuals to use?
16. What are the most common transportation challenges or barriers faced by the populations you serve?
17. What locations in the area do limited or non-English speaking or reading individuals travel to and from the most often?
18. What are the best ways your organization communicates with limited or non-English speaking or reading individuals?
19. Is there anything else you would like to us to know about serving limited or non-English speaking or reading individuals?

Section 3: Low-income Individuals

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

- a. Yes
- b. No

21. Estimate how many clients per month are low-income.

- a. 1-9
- b. 10-19
- c. 20-29
- d. 30-49
- e. 50+

22. How often do the clients you serve rely on transit service?

- Once a month or less
- A few days per month
- Once per week
- 2-4 days per week
- 5-7 days per week

23. Do your low-income clients have trouble using transit?

- a. Yes
- b. No

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

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

26. What are the best ways your organization communicates with low-income individuals?

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

28. Is there anything else you would like us to know about serving low-income individuals?

Section 4: Opportunities for Additional Engagement

29. How can Spokane Transit better engage with your organization and the communities you serve to understand and address transportation needs?

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

31. Would you like more opportunities to provide suggestions or feedback from the clients you serve, or engage in further conversations about STA's Title VI Program?

- a. Yes
- b. No

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

Thank you for your valuable time and input!

Please submit this survey to Madeline Arredondo, Associate Transit Planner, at marredondo@spokanetransit.com, or by mail at 701 W Riverside Ave, Spokane, WA 99201.

Appendix D: Targeted Outreach Report

Spokane Transit Authority 2026-2029 Title VI Program Update Targeted Outreach Report

Executive Summary

Background

As a recipient of federal funding, Spokane Transit Authority (STA) must comply with 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 Title VI Program is required to be updated every three years and the existing Title VI Program, last adopted in 2023, must be updated and approved by the Board of Directors by February 1, 2026, when the current program expires.

Outreach and engagement with the community are necessary to fulfill several requirements of the Title VI program. To ensure compliance with the requirements of Title VI, STA's Title VI Program is required to include the following: a public participation plan (including an outreach plan to engage minority and limited English proficiency (LEP) populations), and collection and reporting on survey data regarding demographics and travel patterns. STA is in the process of updating the current Title VI Program.

STA conducted a Rider Census in April 2025 and into May 2025 to survey riders on fixed-route buses to gather demographic and travel pattern data. STA also conducted a Provider Survey in July 2025 that surveyed community-based organizations (CBOs) who serve low-income, minority, and limited English-speaking populations to gather information on the perceived needs and challenges of clients accessing public transit.

Targeted Outreach Objective

In September 2025 STA engaged local community-based organizations (CBOs) who serve minorities, low-income, and limited English proficient (LEP) populations. STA conducted targeted outreach to CBOs who may not have responded to the previous Provider Survey, or who indicated in the survey that they would like the opportunity to engage in further discussions with STA. The targeted outreach approach included four open focus group sessions and seven in-person meetings at CBO locations.

The purpose of this targeted outreach was to better understand the barriers and challenges their clients face when accessing public transit, and to build and maintain relationships with CBOs who serve these low-income, minority, and LEP populations. The information discussed included organizational information, travel patterns, languages served, travel training, and challenges. The data collected from

this outreach will help to inform STA's Title VI Program update by identifying impacts or burdens on specific populations, improving the Language Assistance Plan, and contributing to fare and service equity analyses.

Key Findings

The targeted outreach to CBOs began on September 4, 2025, and concluded on November 24, 2025. STA sent email invites and reminders to 39 different CBOs to participate in focus group sessions or one-on-one meetings. STA was able to interact with 11 CBOs throughout this outreach effort.

STA received interest from seven CBOs for one-on-one meetings including Family Promise, Latinos en Spokane, Manzanita House, Marshallese Community Association, Refugee and Immigrant Connections Spokane (RICS), International Rescue Committee (IRC), and Thrive International. STA held four open focus group sessions on Teams, on different days and times, during each week of September. There were three CBO attendees in total, including Spokane Neighborhood Action Partners (SNAP), Gonzaga University Center for Community Engagement, and the Northeast Public Development Authority (PDA). Following the public hearing on November 20, 2025, at the Board of Director's meeting, STA staff were encouraged to do additional engagement with Spokane Public Schools (SPS) as students make up a large portion of our ridership. STA staff met with SPS staff on November 24, 2025, and various SPS staff were identified that serve various Title VI populations and who would have more information about students accessing STA services. STA will continue to collaborate with SPS to engage students in public transportation.

- All eleven CBOs served low-income and minority populations, while seven also served LEP populations.
- The best way to communicate with clients across all CBO responses is in-person.
- The top five languages served, in order of frequency, include Spanish, Ukrainian, Arabic, Russian, and Marshallese.
- All CBOs provide some resources for travel training to their clients.
- The most common challenge clients experienced was the language access barriers.
- Another common challenge clients face is understanding how to pay for your fare.
- Top suggestions:
 - Incorporate a clear image, icon, or graphic that indicates major routes, destinations, or points of interest, allowing riders to quickly understand where routes take people to and from.
 - Incorporate translated content explaining all STA services (including Paratransit and Vanpool), how to use Connect, and how to get language assistance.

Targeted Outreach Results

Section 1: Clients Served

Of the CBOs that participated in this outreach, all eleven served low-income and minority populations, and seven served LEP populations. Clients of these CBOs often come from or go to these areas: South

Hill, Spokane Valley, North Spokane, and Downtown. Common routes clients use include routes 1 City Line, 4 Monroe/Regal, 11 Downtown/North Bank Shuttle, and 25 Division.

The best way to communicate with clients across all CBOs is in-person, whether that be at the CBO main offices, at the client's home, or at a community event. A majority of clients served have cell phones, have data plans, are banked, and often utilize STA buses to travel.

Feedback from CBOs indicate that the top five languages served, in order of frequency, include Spanish, Ukrainian, Arabic, Russian, and Marshallese. Other languages served include Farsi, Dari, Swahili, Pashto, Tigrayan, French, Burmese, Kinyarwanda, Amoriac, Haitian, Sudanese, and Turkish.

Section 2: Travel Training

All CBOs provide some resources for travel training to their clients. Four CBOs provide travel training with staff or volunteers for LEP clients, in-person. Most travel training is done using Google Maps for LEP clients due to the ease of using the client's chosen language in their phone settings. CBOs use different methods to help pay fares for clients when travel training that include the organization paying full fare, the organization providing free passes using the Community Access Pass (CAP) program or having the client pay for themselves. STA staff provided information to two CBOs who were not aware of the discounted rate using the CAP program. Of the organizations who provided in-person travel training a major aspect of the experience was to ride along with clients starting at their home location and riding the bus to common destinations like the Plaza, major transfer points, clinics, grocery stores, schools, and work locations. Another travel training resource discussed was the travel training program through Special Mobility Services (SMS), which is partially funded by STA. STA staff provide workshops at high schools for information on Youth Ride Free and for students to learn how to ride the bus.

Section 3: Challenges

Of the CBOs who indicated that their clients experience challenges when riding the bus, the majority of clients faced language access barriers. Some of these barriers include:

- Route changes, detours, temporary stops are not translated
- LEP clients do not understand how to use Connect card/app
 - More often LEP clients pay on the bus
 - LEP clients pay more for multiple trips
- Not enough translated information
 - On the buses
 - On screens at the plaza
 - At stations/centers
- Illiterate riders still have trouble understanding the system

Another common challenge clients face is understanding how to pay for your fare. This includes knowing about pass programs they may qualify for, fare capping, paying on the bus (with cash, pass, card, or tap pay). Among CBOs who serve LEP populations, another challenge is not enough translated information about Youth Ride Free. Due to language barriers, there is an assumption that only school-aged children, with a bus pass, during school hours are allowed to ride free. Other challenges mentioned during this

outreach effort included cost, physical access to bus stops, shelters and benches at stops, trip planning, safety, and trust.

Section 4: Suggestions

During this outreach effort, CBOs shared suggestions that they think would help clients access STA's public transit network. The most suggested topic was to incorporate a clear image, icon, or graphic that indicates major routes, destinations, or points of interest, allowing riders to quickly understand where routes take people to and from.

A majority of suggestions from CBOs included an aspect of translated content that would explain all STA services (including Paratransit and Vanpool), how to use Connect, and how to get language assistance. CBOs indicated that having more translated information on buses, including notices and announcements, as well as translated information on screens would benefit clients' understanding of navigating the transit system. CBOs also suggested having more information in general, and in different languages, regarding the technological aspects of using Connect and trip planning would be useful to clients learning to ride the bus. Real-time information at stops and on the buses is another suggestion to improve client navigation and trip planning on their own.

Conclusions

STA staff were able to provide CBOs with information about the agency's Title VI Program update and receive feedback from CBOs regarding the perceived challenges their clients face when accessing public transit in Spokane. Due to the amount of feedback regarding language access needs, STA staff informed CBOs that STA has translation services and encouraged CBOs to request translations for any language as needed. STA staff received requests for route schedules to be translated into specific languages and provided these requests to STA's Ombudsman and Accessibility Officer. STA staff also followed up with CBOs who requested information about the CAP program and Vanpool services. STA also referred CBOs who were interested in How to Ride workshops to Alyssa Bashor with the Business Development department to coordinate specific events for each organization.

STA used this outreach effort to also provide information about the upcoming low-income fare pilot program that might provide cost benefits for clients riding the bus. A list of CBOs interested in more information has been forwarded to the project contact, Brian Jennings, with the Community Development department who are interested in more information. STA also used this time to provide a draft "How to Ride the Bus" brochure or guide intended for LEP riders to CBOs to receive initial feedback and suggestions, which were shared with Nathan Mauger with the Communications department.

STA also inquired with organizations about any annual events that might be a good fit for STA to attend with information about services. The intent of coordinating STA attendance at CBO events is to continue to provide information needed for their clients to access the bus, and to maintain and build relationships with CBOs who serve low-income, minority, and LEP populations.

The data collected from this outreach will help inform and refine STA's Title VI Program update to ensure that our efforts are aligned with the needs of our diverse communities. The CBOs highlighted the importance and impact of partnership within the community and where further strategic engagement and support are needed to continue to provide equitable access to transit services.

Appendix E: Equity Analyses

2023 Service and Fare Equity (SAFE) Analysis

City Line and Associated Network Changes

FINAL

6/6/2023



Spokane Transit assures nondiscrimination in accordance with Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act. For more information, see www.spokanetransit.com. Upon request, alternative formats of this information will be produced for people who are disabled. Please call (509) 325-6094 (TTY Relay 711) or email ombudsman@spokanetransit.com.

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Section 1 | Introduction

This Service and Fare Equity (SAFE) Analysis is being conducted for the City Line (formerly the Central City Line), Spokane Transit Authority's (STA) first bus-rapid transit (BRT) line. The Project would not have been possible without the Federal Transit Administration (FTA) commitment of \$53.4 million through grant funding through the Small Starts program. Per FTA Circular 4702.1B, transit providers that will implement a Small Starts fixed guideway capital project shall conduct a SAFE analysis. Per the circular, changes to parallel or connecting service are also included in this evaluation.

STA conducts a Title VI service equity analysis to ensure that changes to transit service are consistent with Title VI policies defined by the FTA and Board policies defined by the Spokane Transit Board of Directors. The FTA is responsible for ensuring that federally supported transit services and related benefits are distributed by applicants and recipients of FTA assistance in a manner consistent with Title VI, Section 601 of the Civil Rights Act of 1964, which states:

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 Title VI analysis provides an assessment of potential impacts to minority and low-income communities associated with the proposed changes that result from the implementation of the City Line.

This SAFE Analysis includes the *2022 Service Change Proposal Title VI Equity Analysis* that was performed in 2021 for the implementation of the City Line as an Appendix, as the overall service proposal met STA's definition of a major service change.

Regulatory Framework

Chapter IV of the FTA's Circular 4702.1B further describes the requirements that FTA recipients must follow to ensure that the programs, policies and activities comply with the Title VI requirements. The requirements set system-wide service standards and policies that apply to all fixed-route providers of public transportation service.

Title 49 CFR Section 21.5 (b)(2) specifies that a recipient shall 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." Section 21.5 (b)(2) requires recipients to "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."

Transit providers that operate 50 or more fixed-route vehicles in peak service and are in an urbanized area (UZA) of 200,000 or more in population are required to meet all requirements of Chapter IV including setting service standards and policies, collecting and reporting data, monitoring transit service, and evaluating fare and service changes.

Title VI Program

Spokane Transit prepared the Title VI Program in compliance with Title 49 CFR Section 21.9 (b) and with the FTA Circular 4702.1B “Title VI Requirements and Guidelines for Federal Transit Administration Recipients.” The purpose of the Title VI Program is to document the steps Spokane Transit has taken and will take to ensure Spokane Transit provides services without excluding or discriminating against individuals on the basis of race, color or national origin. The Title VI Program provides an outline of Spokane Transit’s Title VI policies including what constitutes a major service change, the disparate impact and disproportionate burden policy. The Title VI Program Plan also includes the general requirements for Title VI and the requirements for fixed route transit providers. In March 2023, the Spokane Transit Board approved the Title VI Program Plan Update that was submitted to the Federal Transit Administration (FTA).

National Environmental Policy Act (NEPA) / State Environmental Policy Act (SEPA)

In March 2019, STA submitted the *Final Categorical Exclusion and Documented Categorical Exclusion Worksheet* for the Central City Line to the FTA to fulfill the NEPA review requirements, and to the State of Washington to fulfill the SEPA review requirements. STA determined that Central City Line would not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21.C.030(2)(c). This determination is based on the following findings and conclusions: this proposal does not result in significant impacts and mitigation measures have been identified that address potential impacts during construction and operation of the project.

The FTA concurred with STA’s findings in a letter to the CEO dated March 7, 2019. The letter noted that the FTA had determined that the project qualified as a Documented Categorical Exclusion (DCE) under the NEPA pursuant to 23 Code of Federal Regulations (CFR) Section 771.118(d).

Section 2 | Service Equity Analysis (2023)

Introduction

In May 2021 the STA Board of Directors approved a package of major service revisions that were planned to take effect May 2022 with the launch of the City Line and other key service improvements identified in the *STA Moving Forward* plan. Later the same year, the Board identified and approved additional service improvements to support regional growth as part of a package of Near-Term Investments (Resolution No. 790-21). These improvements were envisioned to be implemented over several years beginning in 2022.

In October 2021 the CEO reported to the board on disruptions to the supply chain for City Line station shelters that resulted in shifting the project launch date to July 2023. Instead of shifting all service improvements to this new date, staff planned for a phased implementation of the approved May 2022 Service Revisions and Near-Term Investments with the first tranche representing an approximate 3.6% growth in service going into effect August 2022. A second and final phase was contemplated for July 2023 and identified in the board-approved Transit Development Plan: 2023-2028 (TDP). STA introduced a draft recommendation for July 2023 service revisions in January 2023, conducted public outreach through January and February, including a public hearing. The STA Board of Directors approved the final recommendation report for July 2023 Service Revisions on March 16, 2023. The final recommendation can be viewed here: <https://www.spokanetransit.com/wp-content/uploads/2023/02/July-2023-Final-Recommendation-Report.pdf>

Under the approved July 2023 service changes, all census tracts currently served by STA will continue to receive fixed-route transit service. This Equity Analysis focuses on how changes to STA service that is modified by the implementation of the City Line differently affect communities characterized by particular demographics. The income and race, as reported by the 2016-2020 American Community Survey 5-year estimate of individuals within the service area was examined to determine whether the service changes would disproportionately impact classes protected by Title VI. Specific focus was placed on identifying whether areas with disproportionately high low-income and/or minority residents would see significant service reductions under the Draft Recommendation service change.

Title VI Policies & Population Summary & Population Thresholds

Service Change Disparate Impact Policy

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.

Service Change Disproportionate Burden Policy

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.

Minority and Low-Income Population Summary

Table 1 below, from STA's 2023 Title VI Program, summarizes the minority and low-income populations of all the census tracts within STA's PTBA, based on data from the 2016-2020 5-year American Community Survey.

Table 1. Minority and Low-Income Population Summary

2020 STA PTBA Population Estimate*	442,449
Census Estimate of PTBA Population (Race)**	417,031
Census Estimate of PTBA Minority Population**	60,218
Estimate Percent Minority residing within PTBA	14.4%
Census Estimate of PTBA Population (Poverty Level) ***	402,610
Census Estimate of Low-Income Population***	55,854
Estimate Percent Low-Income residing within PTBA	13.9%

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

**Table B02001. Race, American Community Survey 2016-2020

*** Table B17021. Poverty Status, American Community Survey 2016-2020

Service Equity Analysis

Per FTA Circular 4702.1B, the SAFE Analysis will examine “all proposed changes to parallel or connecting service”. Table 2 below highlights the routes from January 2023 and July 2023 that were included in the analysis.

Table 2. Summary of Planned Service Revisions

Route (Number / Name)	2022 Service	2023 Service
1 – City Line	Not in service	Launches with 15-minute service, 7 days/week
14 – South Adams / Napa	Not in service	Implement new route to replace Route 42 and a portion of Route 29
26 – Lidgerwood	Existing route	Existing route revised to maintain service along Mission Avenue
28 – Nevada	Existing route	Existing route revised to maintain service along Mission Avenue
29 – SCC	Existing Route	Discontinue route. Service replaced by City Line and Route 14
39 – Mission	Existing route	Modify route to make shorter, as service replaced by City Line along Mission Avenue
39 – Minnehaha	Not in Service	Implemented new Route 39 with different name and shorter route to continue service from SCC to Minnehaha neighborhood
42 - South Adams	Existing route	Discontinue route. Route coverage replaced by Route 14
60 – Airport	Existing route	Modify route, as service replaced by City Line in Browne’s Addition
61 – Highway 2	Existing route	Modify route, as service replaced by City Line in Browne’s Addition

Data and Thresholds

For the City Line implementation, this analysis measures the impacts of planned STA service changes on low-income and minority communities by comparing the annual number of accessible trips (combined inbound and outbound) the January 2023 network to those within the planned July 2023 network. Data concerning these communities were obtained using the 2016-2020 American Community Survey 5-year estimate, to be consistent with the 2023 Title VI Program data.

Service Area

For this analysis, any census tract partially or completely contained within the Public Transportation Benefit Area (PTBA) boundary is considered a part of the service area. In addition to this definition, a 1/4 mile buffer around STA's existing January 2023 fixed-route network and the planned July 2023 network were created.

Demographic Data: Income

This analysis sets low-income status at 100% of the US Federal Poverty Level, which can be found in Table 3 below.

Table 3. Federal Poverty Level

Persons in Family/Household	Poverty Guideline
1	\$14,580
2	\$19,720
3	\$24,860
4	\$30,000
5	\$35,140
6	\$40,280
7	\$45,420
8	\$50,560
For families/households with more than 8 persons, add \$5,140 for each additional person.	

Source: U.S. Department of Health & Human Services, 2023

Demographic Data: Race

In an effort to calculate a percentage of census tract population that identifies as a racial minority, the 2016-2020 American Community Survey 5-year estimate was once again used. Self-identified racial composition is reported via the ACS on an individual, rather than household, basis. For the purpose of this equity analysis, individuals who identified as any race other than White were considered minorities. The number of individuals per census block group who identified as minorities was assessed against the total population to render a percent minority population for each census tract.

Census Tract Classifications

All census tracts intersecting a route identified in Table 2 were classified as representing one of the following: minority, low-income, neither or both. A census tract would receive the minority classification if its proportion of minority residents was 10% higher than the average minority proportion for the entire service area. The same is true of each census tract’s proportion of resident’s who are low-income. If a census tract’s population was above both the thresholds for minority and low-income proportions, then it was classified as “both;” the opposite rendered a classification of “neither.” The service area average proportions for minority and low-income populations and respective impact and burden thresholds are shown below in Table 4. The number and percent of census tracts in the service area falling into each classification are shown below in Table 5.

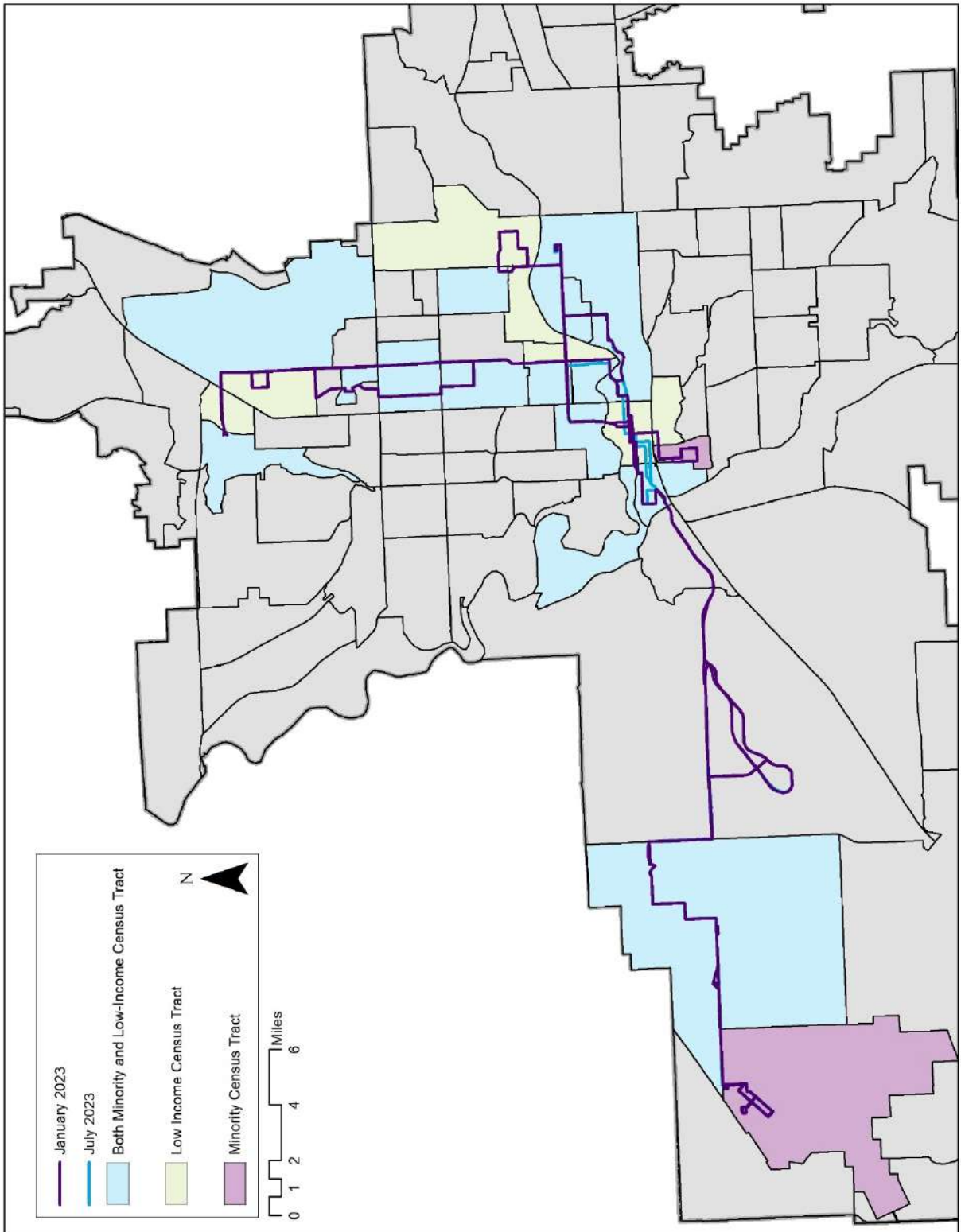
Table 4. Minority and Low-income Classification Thresholds

Minority		Low-Income	
Service Area Average	Impact Threshold	Service Area Average	Burden Threshold
14.4%	15.8%	13.9%	15.2%

Table 5. Census Tract Classifications

Minority	Low-Income	Both	Neither
2 (6.9%)	7 (24.1%)	16 (55.1%)	4 (13.9%)

Map 1. Census Tracts by Title VI Service Policy, Minority and Low-Income Classification



Route Classification

In accordance with STA’s Title VI Program, all routes were analyzed to determine if they were considered a minority or low-income route by evaluating the combined proportion of minority and low-income populations within census tracts adjacent to each route. While Table 5 displays the census tract classifications, the route classifications are shown below in Table 6.

Table 6. Route Classifications

Route	Minority Only	Low-Income Only	Both Minority and Low-Income	Neither Low-Income nor Minority
1 City Line			✓	
14 South Adams / Napa			✓	
26 Lidgerwood			✓	
28 Nevada			✓	
29 SCC			✓	
39 Mission			✓	
39 Minnehaha			✓	
42 South Adams			✓	
60 Airport			✓	
61 Highway 2			✓	

Service Analysis

Determining Service Increase or Decrease

To calculate existing service levels, each existing route’s total number of annual trips was used. The annual trips generally reflect the number of times a rider will be able to access transit from a given location. The annual trips for each route in the January 2023 network and the planned July 2023 network were then compared to determine the change in service at the route level. In many cases, new routes or existing routes are revised to continue serving areas with removed or decreased service.

Change in Service Analysis

The planned July 2023 network and service plan include changes to route alignments, service span, and service frequency to provide faster, more direct service, and to realign or remove redundant service to better align with the implementation of the City Line. In cases where routes are removed and replaced with other services, particularly the City Line, census tracts may see an increase in annual trips. The change in trips for all minority and low-income routes evaluated as a part of this service change is shown in Table 7.

Table 7. Service Change by Minority and Low-Income Routes

Route	Classification	Change in Annual Trips
1 – City Line	Minority & Low-Income	47,210
14 – South Adams / Napa	Minority & Low-Income	17,870
26 – Lidgerwood	Minority & Low-Income	0
28 – Nevada	Minority & Low-Income	0
29 – SCC	Minority & Low-Income	-19,165
39 – Mission	Minority & Low-Income	-17,360
39 – Minnehaha	Minority & Low-Income	8,680
42 - South Adams	Minority & Low-Income	-17,870
60 – Airport	Minority & Low-Income	0
61 – Highway 2	Minority & Low-Income	0

Routes 29, 39 and 42 are the only such routes that both experience a reduction in service in this planned service change and are classified as minority and/or low-income routes. The STA Title VI Program policy states that Disparate Impacts and Disproportionate Burdens would result for all three of these routes. However, this does not account for the addition of new routes that continue providing service in the area.

Route 29 trips will be replaced in full by a combination of the City Line and Route 14.

Route 39 Mission trips will be replaced in full by a combination of the City Line and Route 39 Minnehaha.

Route 42 trips will be replaced in full by Route 14.

Thus, any potential Disparate Impact or Disproportionate Burden associated with Route 29, Route 39, and Route 42 would be mitigated and there are no Disparate Impacts or Disproportionate Burdens under the planned service change.

Fare Equity Analysis

No fare changes are proposed with City Line implementation. There is an introductory period of City Line operations in which STA will not collect that will run through September 4, 2023. This short-term period is less than six months and therefore does not require a fare equity analysis.

Appendices

Appendix	Title
A	<i>2022 Service Change Proposal Title VI Equity Analysis</i>



2022 Service Change Proposal Title VI Equity Analysis Final Report

March 2021

EXECUTIVE SUMMARY

Spokane Transit Authority (STA) is in the process of evaluating a proposed service change planned for implementation in 2022. This service change includes several changes related to service span, service frequency, and route alignments to improve transit service throughout the service area and to realign service to better integrate with the City Line Bus Rapid Transit route, scheduled to begin operations in 2022. In accordance with Title VI of the Civil Rights Act, this service change is evaluated to ensure that any impacts are equitable and there are no Disparate Impacts or Disproportionate Burdens to minority or low-income populations.

According to STA’s Title VI Policy, each route is evaluated to determine whether it is classified as a minority route or a low-income route based on the population and demographics of the surrounding census tracts. Routes that are designated as minority or low-income routes and result in a service reduction are considered to create Disparate Impacts and Disproportionate Burdens, respectively. All routes that were classified as minority and/or low-income and were altered as a part of this proposed service change are shown in Figure 1.

Figure 1 Change in Annual Trips by Route Classification

Route	Classification	Change in Trips	% Change in Trips
Route 26	Minority & Low-Income	-	-
Route 27	Minority & Low-Income	7,990	37%
Route 28	Minority & Low-Income	-	-
Route 29	Minority & Low-Income	-19,110	-100%
Route 32	Minority & Low-Income	-	-
Route 34	Minority & Low-Income	-	-
Route 39	Minority & Low-Income	-19,925	-100%
Route 42	Minority & Low-Income	-17,870	-100%
Route 60	Minority & Low-Income	-	-
Route 61	Minority & Low-Income	2,125	11%
Route 63	Minority	-	-
Route 94	Low-Income	-	-

Route 29, Route 39, and Route 42 are the only such routes that both experience a reduction in service in this proposed service change and are classified as minority and/or low-income routes. The STA Title VI Program policy states that Disparate Impacts and Disproportionate Burdens would result for all three of these routes. However, this does not account for the addition of new routes that continue providing service in the area. All three of these routes are proposed to be removed from service and entirely or partially replaced by a combination of the City Line, a new Route 14, and a new Route 38.

A further analysis at the census tract level identifies the change in the annual number of trips operating within each census tract served by the three removed routes. This analysis shows that all census tracts currently served by these routes would have improved transit service in the service proposal. Thus, any potential Disparate Impact or Disproportionate Burden associated with Route 29, Route 39, and Route 42 would be mitigated and there are collectively no Disparate Impacts or Disproportionate Burdens under the proposed service change.

INTRODUCTION

Title VI of the Civil Rights Act of 1964 ensures that “no person in the United States shall, on the basis 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.” STA has committed to the Federal Transit Administration (FTA) objectives set forth in circular 4702.1B through their Title VI Program and Comprehensive Plan. These objectives work to ensure that FTA-assisted benefits and related services are made available and are equitably distributed without regard to race, color, or national origin.

In Fall of 2016, voters approved funding for *STA Moving Forward*, Spokane Transit Authority’s 10-year plan for more and better transit. Many projects have already been completed, including expanded night and weekend service, the opening of the West Plains Transit Center, and the start of four new routes.

STA is now engaged in planning for service improvements that are programmed and funded for 2022. Some of these improvements include:

- Expanded Hillyard and Northeast Spokane routes
- Implementation of the Central City Line (Bus Rapid Transit Route)

These improvements were developed through an analysis of the local market and existing services, as well as an extensive outreach process with riders and community stakeholders. Using this information, a Preliminary Service Change Proposal was developed and refined to create a single Draft Recommendation for these service improvements. The elements of this Draft Recommendation will be examined as part of this Equity Analysis.

Under this Draft Recommendation service change proposal, all census tracts currently served by STA will continue to receive fixed-route transit service. This Equity Analysis focuses primarily on how changes in STA service differently affect communities characterized by particular demographics. The income and race, as reported by the 2019 American Community Survey, of individuals within the service area was examined to determine whether the proposed service changes would disproportionately impact classes protected by Title VI. Specific focus was placed on identifying whether areas with disproportionately high low-income and/or minority residents would see significant service reductions under the Draft Recommendation service change.

Data and Thresholds

For the Draft Recommendation service change, this analysis measures the impacts of recommended STA service changes on low-income and minority communities by comparing the annual number of trips accessible within the September 2020 network to those accessible within the proposed 2022 network. Data concerning these communities were obtained by way of the 2019 American Community Survey (ACS).

Service Area

Per the STA Title VI Policy, any census tracts partially or completely contained within the Public Transportation Benefit Area (PTBA) boundary is considered a part of the service area. In addition to this definition, a 1/2 mile buffer around STA’s existing 2020 fixed-route network and the recommended 2022 network were created. These buffers, considered a comfortable walk to transit by the FTA, were then overlaid on the census tracts partially or entirely within the PTBA

boundary to represent access to transit service at the census tract level for a supplemental analysis.

Demographic Data: Income

The FTA defines individuals who reside in households where total household income is equal to or less than the ACS poverty level as “low-income.” The following table (Figure 2) shows the poverty guidelines for 2019.

Figure 2 Poverty Guidelines for 2019

Persons in Family/Household	Poverty Guideline
1	\$12,490
2	\$16,910
3	\$21,330
4	\$25,750
5	\$30,170
6	\$34,590
7	\$39,010
8	\$43,430
For families/households with more than 8 persons, add \$4,420 for each additional person.	

Source: U.S. Department of Health & Human Services, 2019

For the 2019 ACS, household income data were collected. These combined characteristics were then assessed against the appropriate poverty threshold, depending on household size, to render a number of persons within each census tract that would be considered “low-income” according to the FTA definition. This number was then compared to the total population resulting in a percentage of population classified as “low-income” for each census tract.

Demographic Data: Race

In an effort to calculate a percentage of census tract population that identifies as a racial minority, the 2019 ACS was again consulted. Self-identified racial composition is reported via the ACS on an individual, rather than household, basis. For the purpose of this equity analysis, individuals who identified as any race other than White were considered minorities. The number of individuals per census tract who identified as minorities was assessed against the total population to render a percent minority population for each census tract.

Census Tract Classification

All census tracts within the STA service area were classified as representing one of the following: minority, low-income, neither or both. A census tract would receive the minority classification if its proportion of minority residents was 10% higher than the average minority proportion for the entire service area. The same is true of each census tract’s proportion of resident’s who are low-income. If a census tract’s population was above both the thresholds for minority and low-income proportions, then it was classified as “both;” the opposite rendered a classification of “neither.” The service area average proportions for minority and low-income populations and respective

impact and burden thresholds are shown below in Figure 3. The number and percent of census tracts in the service area falling into each classification are shown below in Figure 4 and are displayed on the map contained in Figure 5.

Figure 3 2019 Low-Income and Minority Classification Thresholds

Minority		Low-Income	
Service Area Average	Impact Threshold	Service Area Average	Burden Threshold
12.8%	14.1%	13.4%	14.7%

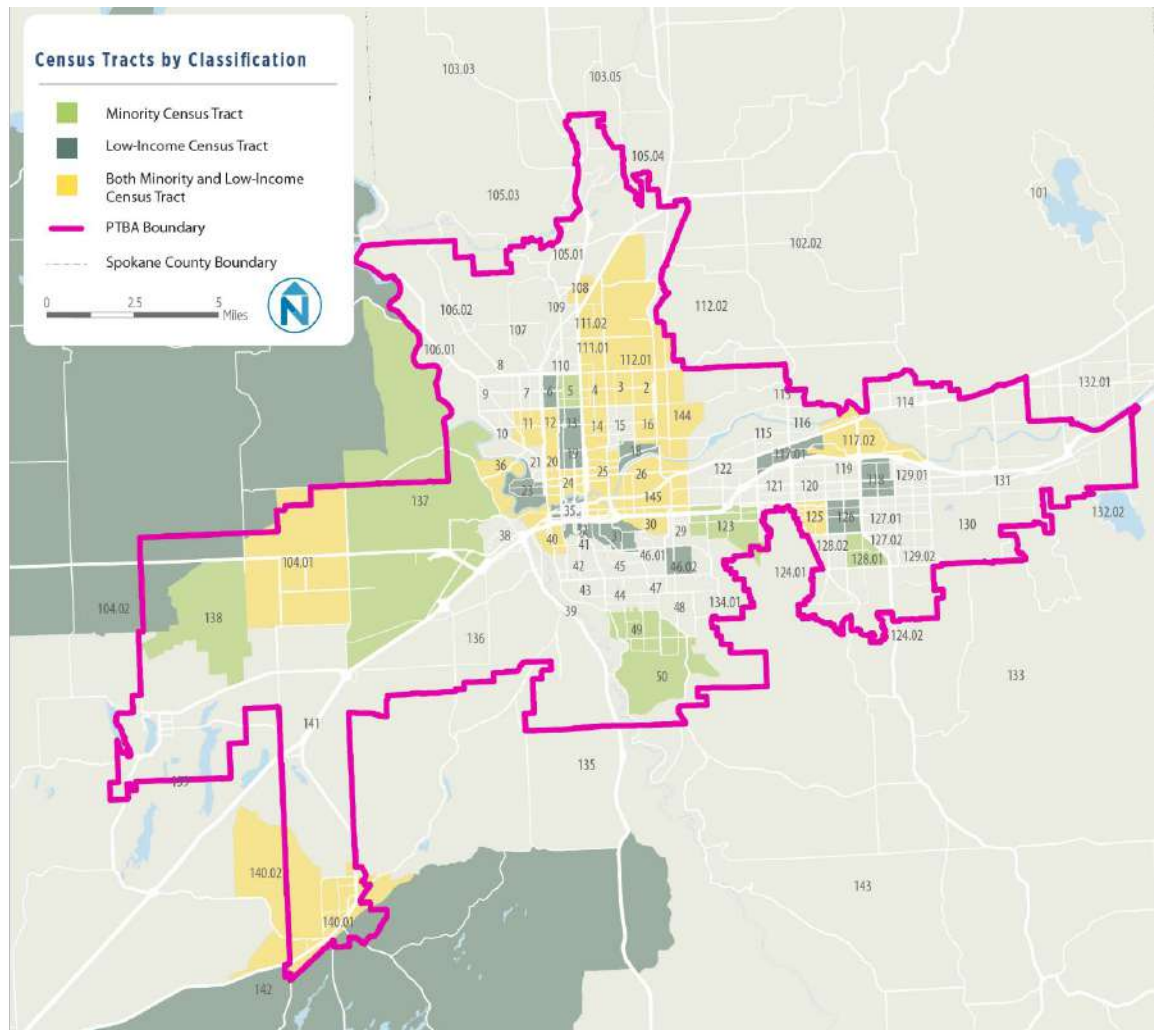
Source: US Census Bureau, American Community Survey 2019

Figure 4 Census Tract Classifications

Minority	Low-Income	Both	Neither
7 (7%)	14 (14%)	25 (26%)	52 (53%)

Source: US Census Bureau, American Community Survey 2019

Figure 5 Census Tracts by Minority and Low-Income Classification



Disparate Impact and Disproportionate Burden Threshold

In accordance with FTA guidelines, the following criteria for defining the disparate impact and disproportionate burden thresholds were used in this analysis:

- **Disparate Impact** – 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. 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 of the census tracts along that route.
- **Disproportionate Burden** – 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. 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 adding all of the census tracts along that route.

These thresholds are defined in STA's Impact Policy for Major Service Changes (and Disproportionate Burden Policy), which are included in STA's current Title VI Program.

Route Classification

In accordance with STA's Title VI Program, all routes were analyzed to determine if they were considered a minority or low-income route by evaluating the combined proportion of minority and low-income populations within census tracts adjacent to each route. The results of this analysis for each route in the existing STA system is shown in Figure 6 with routes proposed to be altered under the service change proposal identified in bold. Minority and low-income classified routes are also displayed in the maps contained in Figure 7 and Figure 8, respectively.

Figure 6 Route Classifications

Minority Only Routes	Low-Income Only Routes	Both Low-Income & Minority Routes	Neither Low-Income Nor Minority Routes
<ul style="list-style-type: none"> ▪ Route 62 ▪ Route 63 	<ul style="list-style-type: none"> ▪ Route 23 ▪ Route 45 ▪ Route 90 ▪ Route 94 ▪ Route 173 ▪ Route 190 ▪ Route 662 	<ul style="list-style-type: none"> ▪ Route 11 ▪ Route 12 ▪ Route 20 ▪ Route 21 ▪ Route 25 ▪ Route 26 ▪ Route 27 ▪ Route 28 ▪ Route 29 ▪ Route 32 ▪ Route 33 ▪ Route 34 ▪ Route 39 ▪ Route 42 ▪ Route 60 ▪ Route 61 ▪ Route 64 ▪ Route 66 ▪ Route 67 ▪ Route 68 ▪ Route 663 ▪ Route 664 	<ul style="list-style-type: none"> ▪ Route 4 ▪ Route 22 ▪ Route 43 ▪ Route 74 ▪ Route 95 ▪ Route 96 ▪ Route 97 ▪ Route 98 ▪ Route 124 ▪ Route 144 ▪ Route 172 ▪ Route 633

Source: US Census Bureau, American Community Survey 2019

Figure 7 Existing STARoutes by Minority Classification

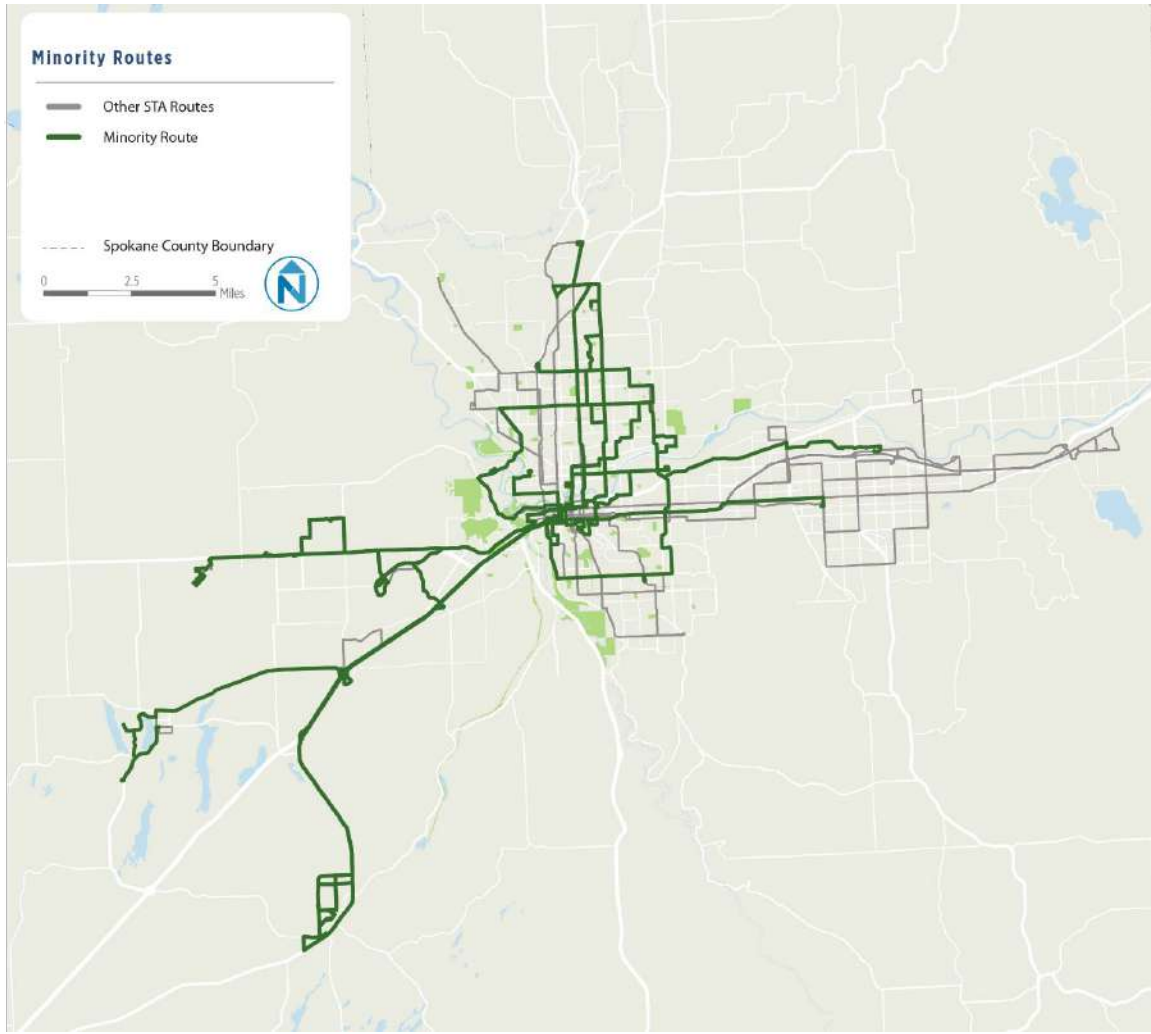
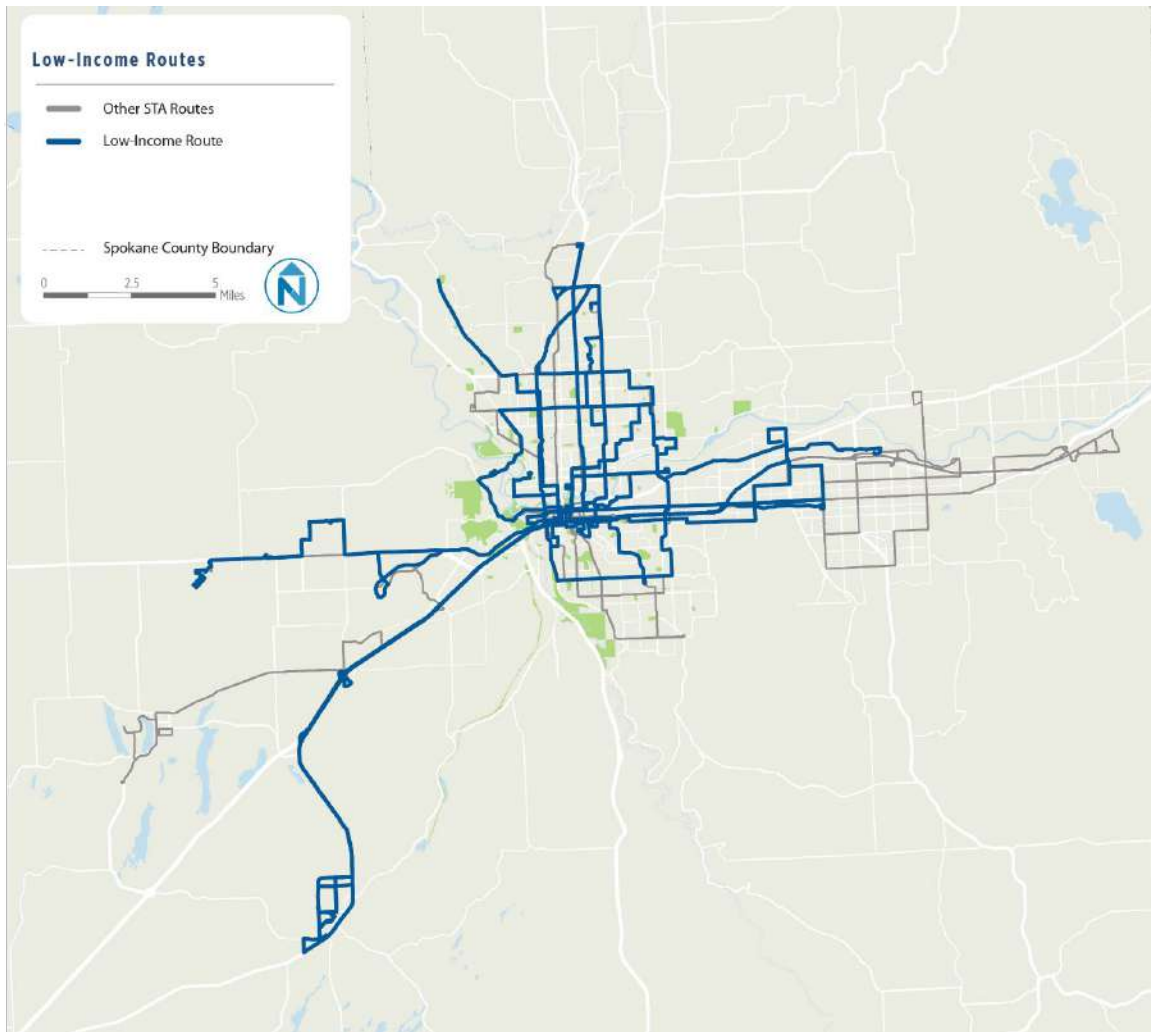


Figure 8 Existing STARoutes by Low-Income Classification



SERVICE ANALYSIS

Determining Service Increase or Decrease

To calculate existing service levels, each existing route's total number of annual trips was used. The annual trips generally reflect the number of times a rider will be able to access transit from a given location. The annual trips for each route in the 2020 and recommended 2022 networks were then compared to determine the change in service at the route level. Approximately, 21% of routes would see an increase in service, including new routes added to the system, and 10% of routes would have decreased service, including routes that are eliminated from service (Figure 9). In many of these cases, new routes or existing routes are revised to continue serving areas with removed or decreased service.

In addition to this analysis at the route level, each census tract within the service area was also assigned the sum of the total annual trips of all routes whose 1/2 mile buffer passed through it. This was done for both the 2020 and recommended 2022 networks. The proposed annual trips

figure was then subtracted from the existing annual trips to determine the change in service: increased service, decreased service, or no change. Approximately 67% of census tracts served under the 2022 proposed network will experience an increase in STA service under the recommended service plan. Around 20% of census tracts served by the proposed network will experience decreased STA service. Figure 10 and Figure 11 show areas where service is proposed for removal and routes categorized by the change in annual trips, respectively.

Figure 9 Service Change Overview

Service Change Category	Census Tracts in Service Area	Routes
Increased Service	66 (67%)	11 (21%)
No Change in Service	13 (13%)	36 (69%)
Decreased Service	19 (20%)	5 (10%)

Figure 10 Existing STA Service Proposed for Removal

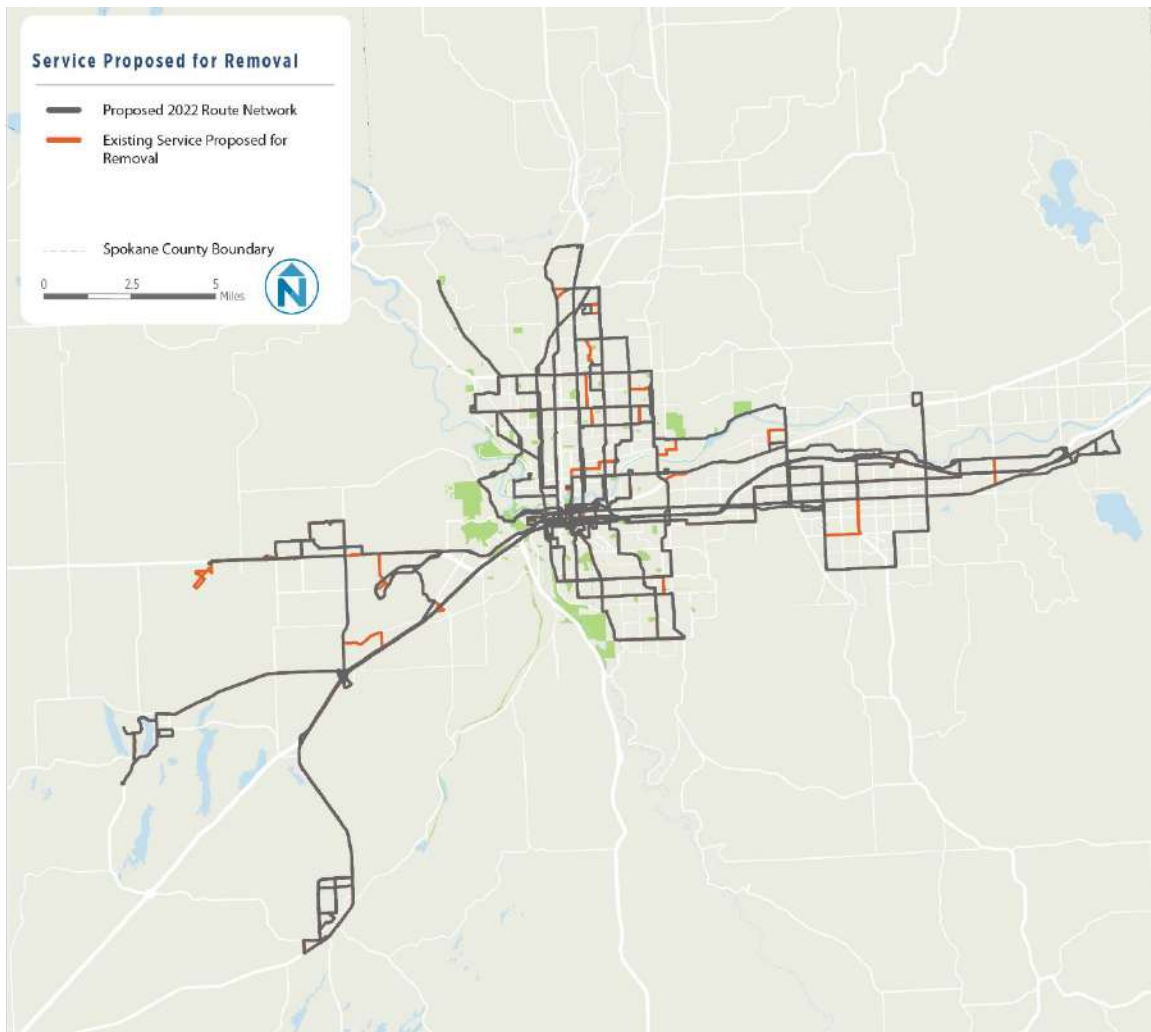
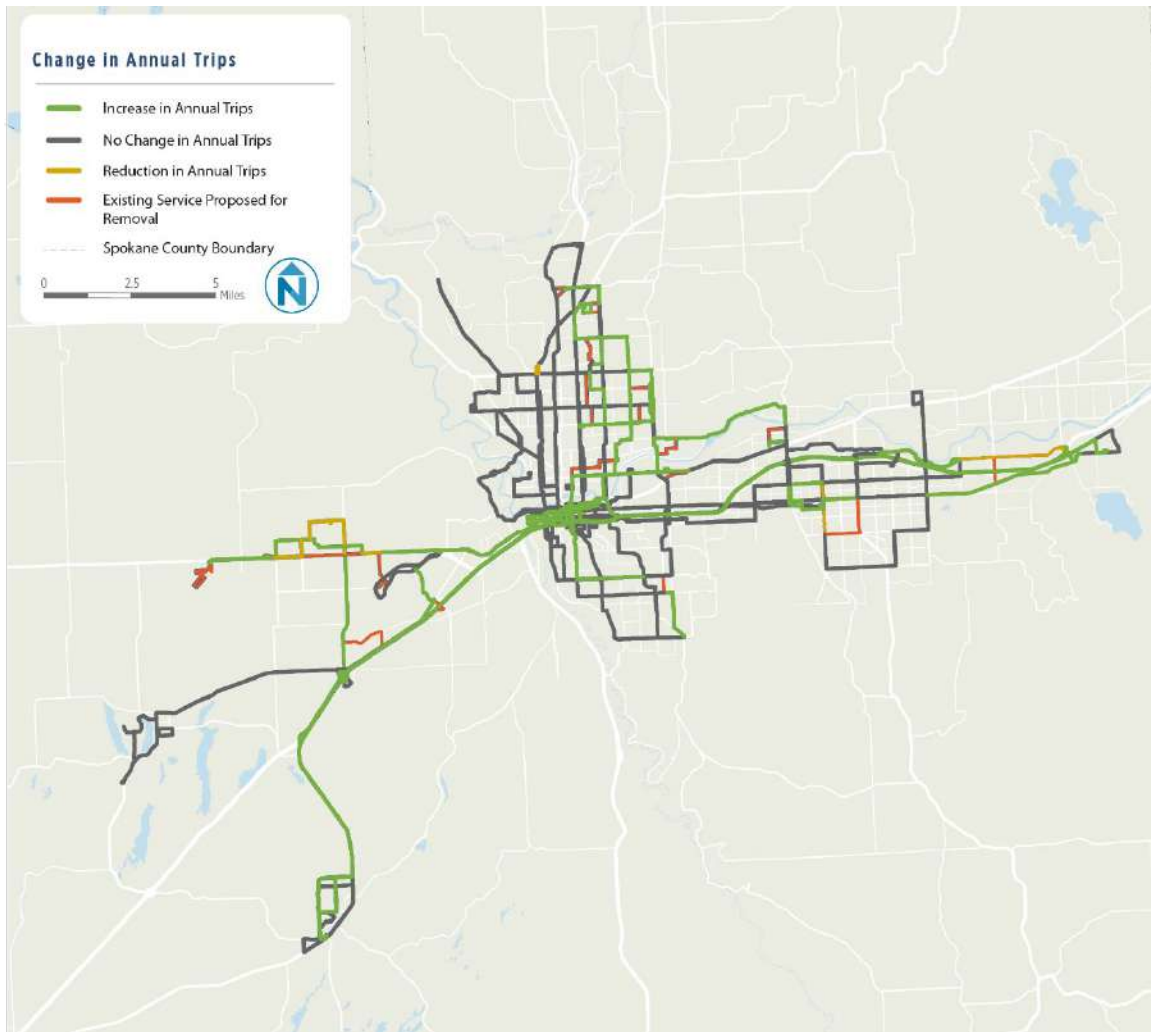


Figure 11 Change in Annual Trips from 2020 to 2022 – STA Network by Route



CHANGE IN SERVICE ANALYSIS

The 2022 proposed network and service plan include changes to route alignments, service span, and service frequency to provide faster, more direct service, and to realign or remove redundant service to better align with the implementation of the City Line. In cases where routes are removed and replaced with other services, particularly the City Line, census tracts may see an increase in annual trips. The change in trips for all minority and low-income routes evaluated as a part of this service change is shown in Figure 12. Routes categorized by service change are shown overlaid with minority and low-income classified census tracts in Figure 13.

Figure 12 Service Change by Minority and Low-Income Routes

Route	Classification	Change in Trips	% Change in Trips
Route 26	Minority & Low-Income	-	-
Route 27	Minority & Low-Income	7,990	37%
Route 28	Minority & Low-Income	-	-
Route 29	Minority & Low-Income	-19,110	-100%
Route 32	Minority & Low-Income	-	-
Route 34	Minority & Low-Income	-	-
Route 39	Minority & Low-Income	-19,925	-100%
Route 42	Minority & Low-Income	-17,870	-100%
Route 60	Minority & Low-Income	-	-
Route 61	Minority & Low-Income	2,125	11%
Route 63	Minority	-	-
Route 94	Low-Income	-	-

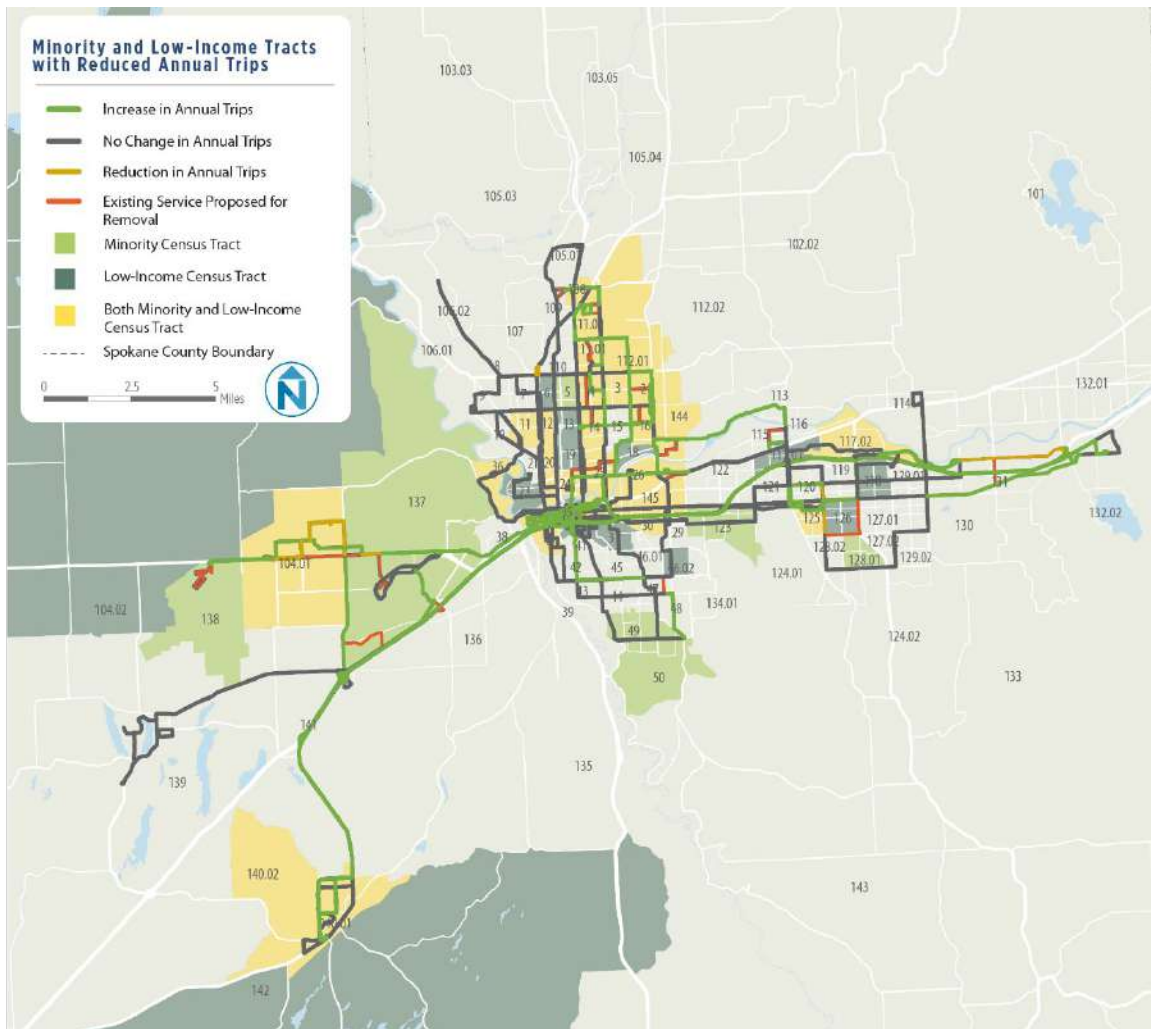
Route 29, Route 39, and Route 42 are the only such routes that both experience a reduction in service in this proposed service change and are classified as minority and/or low-income routes. The STA Title VI Program policy states that disparate impacts and disproportionate burdens would result for all three of these routes. However, this does not account for the addition of new routes that continue providing service in the area. All three of these routes are proposed to be removed from service and entirely or partially replaced by a combination of the City Line, a new Route 14, and a new Route 38.

A further analysis at the census tract level identifies the change in the annual number of trips operating within each census tract served by the three removed routes (Figure 14). This analysis shows that while these three routes are removed, all census tracts currently served by these routes would have improved transit service in the proposed service change. Thus, any potential Disparate Impact or Disproportionate Burden associated with Route 29, Route 39, and Route 42 would be mitigated and there are no Disparate Impacts or Disproportionate Burdens under the proposed service change.

Figure 13 Change in Trips at the Census Tract Level for Routes with Reduced Service

Route 29		Route 39		Route 42	
Census Tract	Change in Annual Trips	Census Tract	Change in Annual Trips	Census Tract	Change in Annual Trips
26	+88,205	16	+36,400	32	+65,375
35	+64,810	18	+77,805	35	+64,810
145	+88,195	24	+64,810	40	+64,630
		25	+76,155		
		26	+88,205		
		35	+64,810		
		144	+48,820		
		145	+88,195		

Figure 14 Change in Annual Trips from 2020 to 2022 – STA Network by Routewith Census Tract Classifications



Census Tract Analysis

While not required to determine disparate impacts or disproportionate burdens according to STA's Title VI Program, a supplemental analysis was conducted to determine potential impacts at the census tract level. The results of the combined census tract classification and service analysis found that eight census tracts were identified as being low-income/minority and having reduced service under the 2022 proposed service change (shown in Figure 15), including:

- Census tract 4
- Census tract 5
- Census tract 6
- Census tract 20
- Census tract 46.02
- Census tract 104.01
- Census tract 128.01

Census Tract 4

Census tract 4 is located in north Spokane between Francis Ave, Nevada St, Wellesley Ave, and Division St. In this census tract, Route 27 is replaced with Route 35 at a lower peak frequency, reducing the number of trips operating through the census tract. However, census tract 4 is also served with multiple 15-minute frequency routes operating on Wellesley Ave, Division St, and Nevada St. This service change was made to provide higher frequency service along the Hillyard corridor on the revised Route 27 and ensures that a number of high frequency north-south and east-west routes continue serving census tract 4. While there are fewer annual trips, this tract continues to have a high level of transit accessibility.

Census Tract 5

Census tract 5 is located in north Spokane between Francis Ave, Monroe St, Wellesley Ave, and Division St. In this census tract, Route 27 is replaced with Route 35 at a lower peak frequency, reducing the number of trips operating through the census tract. However, census tract 5 is also served with multiple 15-minute frequency routes operating on Wellesley Ave, Monroe St, and Division St. This service change was made to provide higher frequency service along the Hillyard corridor on the revised Route 27 and ensures that a number of high frequency north-south and east-west routes continue serving census tract 5. While there are fewer annual trips, this tract continues to have a high level of transit accessibility.

Census Tract 6

Census tract 6 is located in north Spokane between Francis Ave, Monroe St, Wellesley Ave, and Ash St. In this census tract, Route 27 is replaced with Route 35 at a lower peak frequency, reducing the number of trips operating through the census tract. However, census tract 6 is also served with multiple 15-minute frequency routes operating on Wellesley Ave and Monroe St. This service change was made to provide higher frequency service along the Hillyard corridor on the revised Route 27 and ensures that a number of high frequency north-south and east-west routes continue serving census tract 6. While there are fewer annual trips, this tract continues to have a high level of transit accessibility.

Census Tract 20

Census tract 20 is located north of downtown Spokane and is roughly bound by Courtland Ave, Monroe St, Boone Ave, and Ash St. No service is directly removed from this census tract as a result of the 2022 service change proposal. However, the existing Route 39 operates within ½ mile of the census tract and was attributed to the annual trips serving census tract 20 in the existing network. In the 2022 proposed network, Route 39 is removed and partially replaced by the City Line at a higher frequency. However, the City Line alignment would not operate within ½ mile of census tract 20. Census tract 20 would continue to have access to transit service on Monroe St, Boone Ave, Maple St, Ash Ave, and Northwest Blvd and would continue to be within ½ mile of Route 27. No service would be removed from within census tract 20, only within ½ mile of the census tract.

Census Tract 46.02

Census tract 46.02 is located to the southeast of downtown Spokane and is roughly bound by 17th Ave, Havana St, 29th Ave, and Ray St. In the existing network, the census tract is served by both Routes 34 and 43, which connect at the South Hill Park-and-Ride located just over ½ mile east of the census tract. The proposed recommendation includes realigning Route 43 on a more direct alignment on 29th Ave west of the South Hill Park-and-Ride rather than deviating out of direction onto Ray St and 37th Ave. The segment of 29th Ave between Ray St and Southeast Blvd would now only be served by Route 34, not a combination of both Route 34 and Route 43. The reduction of service in this tract is due to removing the overlapping service on this segment. Additionally, in the proposed service change Routes 34 and 43 would interline at 39th Ave and Southeast Blvd meaning census tract 46.02 would continue to have access to both routes at the same level of service as they are currently operating. No service would be removed from within census tract 46.02, only within ½ mile of the census tract.

Census Tract 104.01

Census tract 104.01 is located in the Airway Heights neighborhood between Rambo Rd, Deno Rd, Hayford Rd, and Thorpe Rd and is served by Routes 60, 61, and 63. The proposed service changes in this census tract are intended to achieve three specific goals:

- Provide faster, more direct service
- Provide simpler, easier to understand service
- Improve local service in Airway Heights

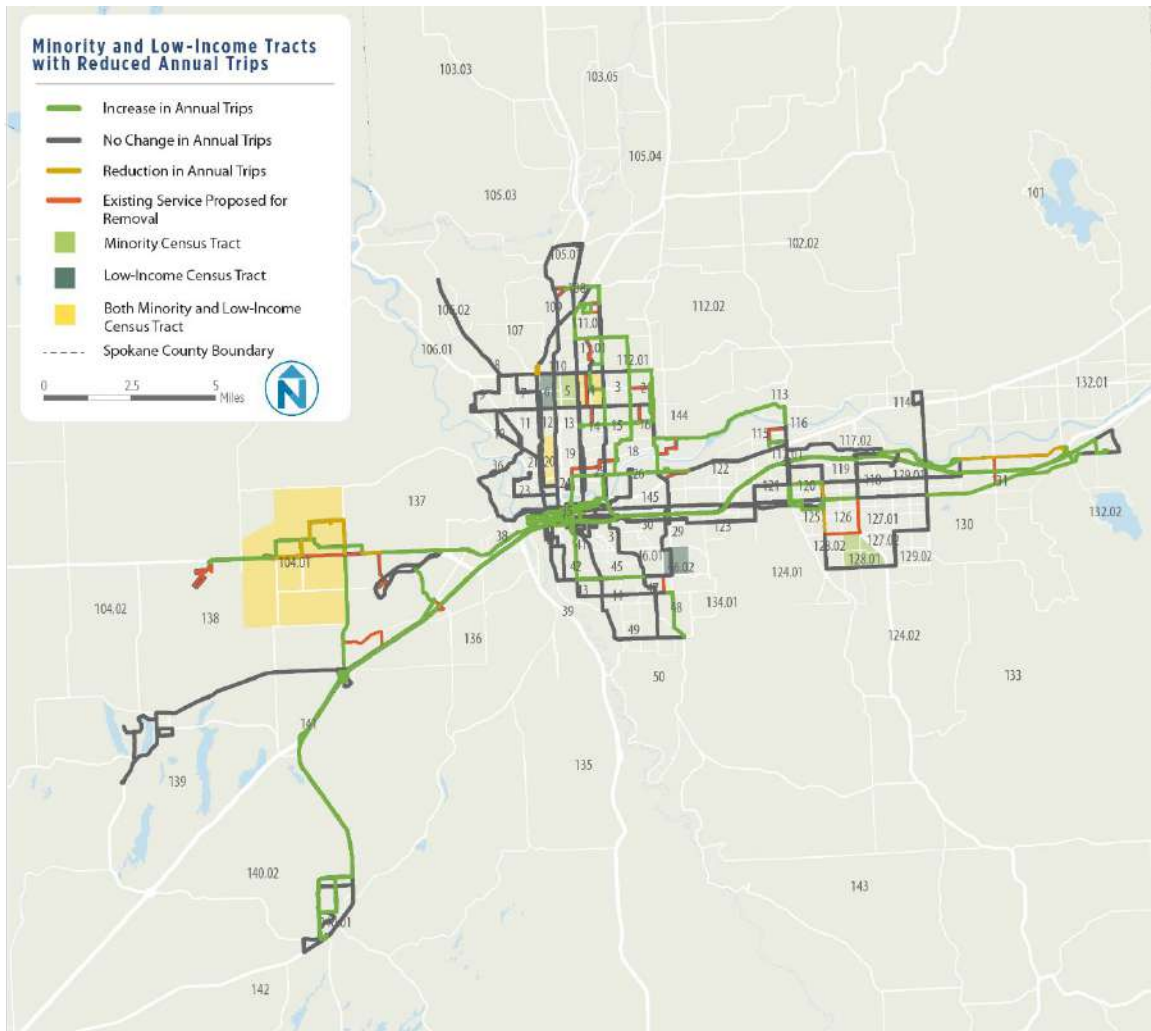
This service change achieves these goals by making Route 60 operate more consistently, removing the evening and weekend only service through Airway Heights and operating fewer deviations. Route 61 would operate more frequently, providing more useful service in Airway Heights throughout the day. Route 63 would operate a more direct alignment through Airway Heights on Hayford Rd, providing service to a larger area of this census tract than currently exists. Additionally, both Route 60 and Route 61 would provide faster, more direct service into downtown Spokane.

Census Tract 128.01

Census tract 128.01 is located in Spokane Valley, generally between 16th Ave, SR 27, 32nd Ave, and Bowdish Rd and is currently served by Routes 96 and 97. In the proposed service change, Route 96 would be realigned to provide more direct service between the Valley Transit Center, Valley

Mall, and Spokane Industrial Park. As a part of this realignment, service no longer operates south of 4th Ave on University Road, 16th Ave, or Pines Rd. This change removes Route 96 from census tract 128.01, including six stops at the intersections of 16th Ave & Pines Rd, 16th Ave & Union Rd, 16th Ave & Bowdish Rd. These six stops combined for an average of zero daily boardings and four daily alightings in 2020. This service change was made to provide faster, more direct service to higher ridership areas and removes service from low ridership areas.

Figure 15 Minority and Low-Income Census Tracts with Reduced Annual Trips



Revised Draft Title VI Fare Equity Analysis

Proposed Fare Policy Revisions: Reduced Fare for Low-Income Riders



Spokane Transit assures nondiscrimination in accordance with Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act. For more information, see www.spokanetransit.com. Upon request, alternative formats of this information will be produced for people who are disabled. Please call (509) 325-6094 (TTY Relay 711) or email ombudsman@spokanetransit.com.

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Section I: Introduction

In December 2024, Spokane Transit Authority (STA) approved *Connect 2035*, the 10-year plan that is the strategic roadmap for bus, Paratransit, and Rideshare services through 2035. This strategic plan identified implementing a reduced fare pilot program for riders experiencing low incomes, which will provide new benefits and greater convenience for riders.

This report documents STA's Title VI equity analysis of the proposed fare policy revisions which will guide implementation of the pilot program for a reduced fare program for low-income riders. On July 24, 2025, STA's Board of Directors were briefed on the completion of this fare equity analysis prior to taking action to approve the pilot program (Attachment A). This analysis was updated to include an analysis of fare media for reduced fare riders paying cash on the bus for verification and eligibility. STA will keep this analysis on file and available for review by the Federal Transit Administration (FTA) and the general public.

The fare equity analysis was performed in accordance with the requirements specified in the Federal Transit Administration (FTA), Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients and STA's 2026-2029 Title VI Program and the policies outlined in STA's Comprehensive Plan, *Connect Spokane, A Comprehensive Plan for Public Transportation*.

Fare Policy Revisions Objectives and Overview

The objectives of the revisions are to incorporate a new pilot reduced fare program for riders experiencing low incomes, thus broadening the current discount programs to encourage ridership and to enhance access and equity.

Description of Fleet and Services

Spokane Transit Authority is a regional public transportation agency providing a variety of transportation services, including fixed-route, Paratransit, and Vanpool service. In 2024¹ Spokane Transit's fixed route system provided 10,166,876 unlinked passenger trips and traveled 7,146,245 revenue miles. Paratransit provided 390,956 passenger trips and traveled 2,485,326 revenue miles. Rideshare provided 103,270 passenger trips and traveled 1,096,062 revenue miles.

STA's 2025 fleet includes 173 active fixed route coaches, 124 active Paratransit vans and 100 active rideshare vehicles. Fixed Route Bus Service operates 52 routes, 365 days a year. In accordance with the Americans with Disabilities Act (ADA), all vehicles are lift or ramp equipped.

Paratransit Service is operated by STA and its contractor for people who qualify under the eligibility requirements of the ADA. Paratransit service is provided within a defined service area, during the same hours and days as fixed route service and in compliance with applicable state and federal laws for service to people whose disability prevents them from using Fixed Route bus service. The directly operated Paratransit fleet is comprised of 73 vehicles, each with a capacity for up to 15 passengers. Contracted transportation supplements service during the early mornings, nights and weekends as well as augments capacity during weekdays.

¹ Spokane Transit is providing 2024 NTD and fixed route service and maintenance data (unless otherwise noted)

Vanpool (Rideshare) Service augments STA's public transportation system through the assignment of passenger vans to vanpool groups. A vanpool group can be formed by a group of at least three and up to 14 people whose origin or destination is within the STA service area.

Areas Served

Areas served include cities of Airway Heights, Cheney, Liberty Lake, Medical Lake, Millwood, Spokane, and Spokane Valley and some unincorporated areas of Spokane County. Services include connections between downtown Spokane and the Spokane International Airport, major shopping malls, area colleges and universities, and Fairchild Air Force Base. Spokane Transit Authority (STA) operates within the designated Public Transportation Benefit Area (PTBA) which encompasses approximately 248 square miles of Spokane County which includes approximately 475,470 residents or 84.9 percent of the county population.

STA's Title VI Policy Development

Title VI of the Civil Rights Act of 1964 (Title VI) requires public transportation providers that receive federal funds to operate services and programs in a non-discriminatory manner. Race, color, and national origin are protected classes under Title VI. Low-income populations are not a protected class under Title VI; however, the FTA requires transit providers to evaluate the impacts of any fare changes on low-income populations as well.

STA's Fare Change Minority Disparate Impact Policy and Fare Change low-income Disproportionate Impact Policy were developed with an extensive public outreach effort. Letters were sent to a wide range of Limited English Proficiency (LEP) and nonprofit organizations as well as community centers and government agencies in early 2013 and early 2014. A public hearing was held to gather public comments. The 2014 Title VI update and policies were adopted by the Spokane Transit Board of Directors in early 2014. These policies continue to serve the agency and were incorporated into the 2024 *Connect Spokane* update and the 2026 – 2029 Title VI Program.

Section II. Proposed Fare Policy

STA periodically evaluates its fare policy and fare structure. The last major review of the fare structure was conducted in 2022 and led to the Connect fare program.

Spokane Transit is proposing a pilot for a reduced fare program for riders experiencing low incomes in households at or below 200 percent of the federal poverty level, enabling them to ride STA at a reduced fare rate. This is a pilot program that comes directly out of *Connect 2035*. The 2024 update to *Connect Spokane* added Revenues and Fare Policy 2.6 Eligibility-based Fare Programs, which outlines the purpose of the policy, as well as criteria for any proposed program:

STA supports opportunities for individuals to use public transportation at a discounted cost based on targeted eligibility criteria and rigorous due diligence.

Opportunities for individuals to use public transportation should be made available through eligibility-based fare programs that offer customer-facing discounts. Eligibility determination and classifications will be made by the STA Board of Directors and identified in STA's existing fare structure. Prior to the creation and implementation of any eligibility-based fare program, the Board shall conduct an evaluation to determine if the proposed program can meet the following criteria:

- The program and the basis for eligibility are relatively simple to describe and understand, particularly for those who are prospective participants.
- The discount offered by the program considers proportionate costs and benefits relative to other eligibility-based fare programs, as well as other fare partnerships and rates.
- Insofar as possible, the program adheres to eligibility requirements that can be determined with verifiable public information without the creation of storage by STA of sensitive health or income information.
- The program can be deployed without undue burden on STA operations or community partners.
- The program provides safeguards against abuse.
- The program has a method for reporting performance.
- The estimated ridership and financial impacts of the proposed program have been estimated and reasonably understood as far as STA's commitment to community benefit and fiscal accountability.

Preliminary research on existing low-income transit fare programs helped identify best practice approaches as well as their applicability to the Spokane metro area. The research served as the basis for developing recommendations and parameters for a pilot reduced fare program for riders experiencing low incomes. This program will help STA maintain and expand service to meet the transit needs of low-income populations in Spokane Transit's service area.

STA currently uses an account-based fare collection system with a card and mobile ticketing application as the primary (non-cash) fare media which includes reduced fare program to adjust costs for the rider, while also enabling rides to take advantage of daily and monthly fare capping. The new low-income fare pilot program, named the "Opportunity Fare", is a reduced fare program that requires additional verification of eligibility due to the parameters of the program. Riders who are eligible for the Opportunity Fare program will also have the option to pay for fare in cash at the fare box but would not be able to utilize fare capping. Due to safety concerns with operators and fare enforcement for reduced fare programs, STA is conducting an equity analysis that will analyze the impacts of fare media changes for low-income and minority populations.

Section III. Fare Equity Analysis

Title VI of the Civil Rights Act of 1964 requires public transportation providers that receive federal funds to operate services and programs in a non-discriminatory manner. Race, color, and national origin are protected classes under Title VI.

To fulfill the requirements of Executive Order 12898 and DOT Order 5610.2(a) on Environmental Justice, FTA requires that an impact analysis be conducted to identify any disproportionate burdens to low-income populations that would occur as a result of a major service or fare change. Low-income populations are not a protected class under Title VI. However, Chapter IV-18 of the Title VI Circular states that “transit providers should take steps to minimize or mitigate impacts (for this population) where practical. The provider should also describe alternatives available to low-income passengers affected by service changes.”

STA’s Title VI policy, adopted in early 2014, identifies how STA assesses disparate impact and disproportionate burden that could potentially result from changes to fare policy.

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.

Low-income Disproportionate Impact Policy

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.

An overview of the proposal, and the results of the analysis, follows.

Overview of Fare Policy Revisions

STA is proposing a pilot for a reduced fare program for riders experiencing low incomes. The current and proposed fares by fare type are shown in Table 1. The change would reduce all adult fare categories (One Ride, Daily Fare capping, and Monthly Fare capping) for eligible low-income riders to half the price (50%) of Adult fare. After the decrease, the low-income fare would align with Honored Rider and Stars & Stripes fare types. STA is also proposing to introduce a Photo ID for all reduced fare customers paying with cash on the bus to verify reduced fare eligibility.

Table 1: Proposed Low-income Fare Changes for Adult Fares

	Current Adult Fare	Proposed Adult Fare
One Ride	\$2.00	\$1.00
Fare capping (Daily)	\$4.00	\$2.00
Fare capping (Monthly)	\$60.00	\$30.00

The low-income fare pilot program will be a fare designation available to persons who are determined by STA and its verification partners to meet the eligibility requirements for a reduced fare because the person can appropriately document that their annual income is at or less than 200% of the federal poverty level (FPL). The FPL is the most commonly used criterion to determine eligibility and benefits for economic support programs at the federal, state and local level. The Census Bureau sets poverty thresholds annually using a nationally representative survey and then the Department of Health and Human Services (HHS) simplifies the thresholds to set federal poverty guidelines, with adjustments for family size.

Data Sources

The 2024 Customer Satisfaction Survey and the 2025 Title VI Rider Census collected fare payment and demographic data necessary to conduct a fare equity analysis consistent with the policies described earlier in this report. The 2019-2023 American Community Survey data is necessary to analyze low-income and minority census tracts in relation to retail locations where Connect cards may be reloaded.

DRAFT

Disparate Impact Analysis

The first level of the Disparate Impact analysis is a determination of how eligible trips compare to non low-income eligible trips in terms of racial/ethnic minority status within each group. Low-income riders are defined as those with a household income at or below 200 percent of the federal poverty level, which is a requirement for the low-income fare program. The proportion of the STA service area population that minorities represent is 14.4%. As shown in Table 2, the 2024 Customer Satisfaction Survey indicated that the share of low-income eligible trips taken by minority riders (72.6%) is significantly greater than non low-income eligible trips taken by minority riders (27.4%). In other words, a greater percentage of minority riders would be positively affected by the fare change than the percentage of minority riders on STA services as a whole. Conversely, a lower percentage of higher income minority riders would experience no impact by the proposed changes since fares would remain the same. This indicates that the proposal to decrease adult fares for eligible low-income riders would not disproportionately impact minority riders.

Table 2: Comparison of Low-income Riders, by Minority Status

Low-income and Minority Ridership [^]		
	Minority Riders	Non-Minority Riders
Low-income Riders	72.6%	69.9%
Non low-income Riders	27.4%	30.1%
Total	100%	100%

[^] respondents who responded to the household income question with “don’t know” or “prefer not to say”, as well as those respondents who did not answer the number of people in the household were excluded from this analysis due to lack of data

The second level of the Disparate Impact analysis is a determination of how many low-income riders pay fare with cash on the bus compared to non low-income riders. As shown in Table 3, the 2025 Title VI Rider Census indicates that a total of 40.3% of overall riders use reduced fare, while 44.3% of minority riders use a reduced fare. A total of 11.9% of overall riders pay fare with cash on the bus, while 14.3% of minority riders pay fare with cash on the bus. In other words, a greater proportion of minority riders would be positively affected by using the reduced fare program along with using the account-based fare collection system, while also enabling riders to take advantage of daily and monthly fare capping. All riders using cash on the bus with a reduced fare pass will be required to obtain the new photo ID card for verification of eligibility for reduced fare.

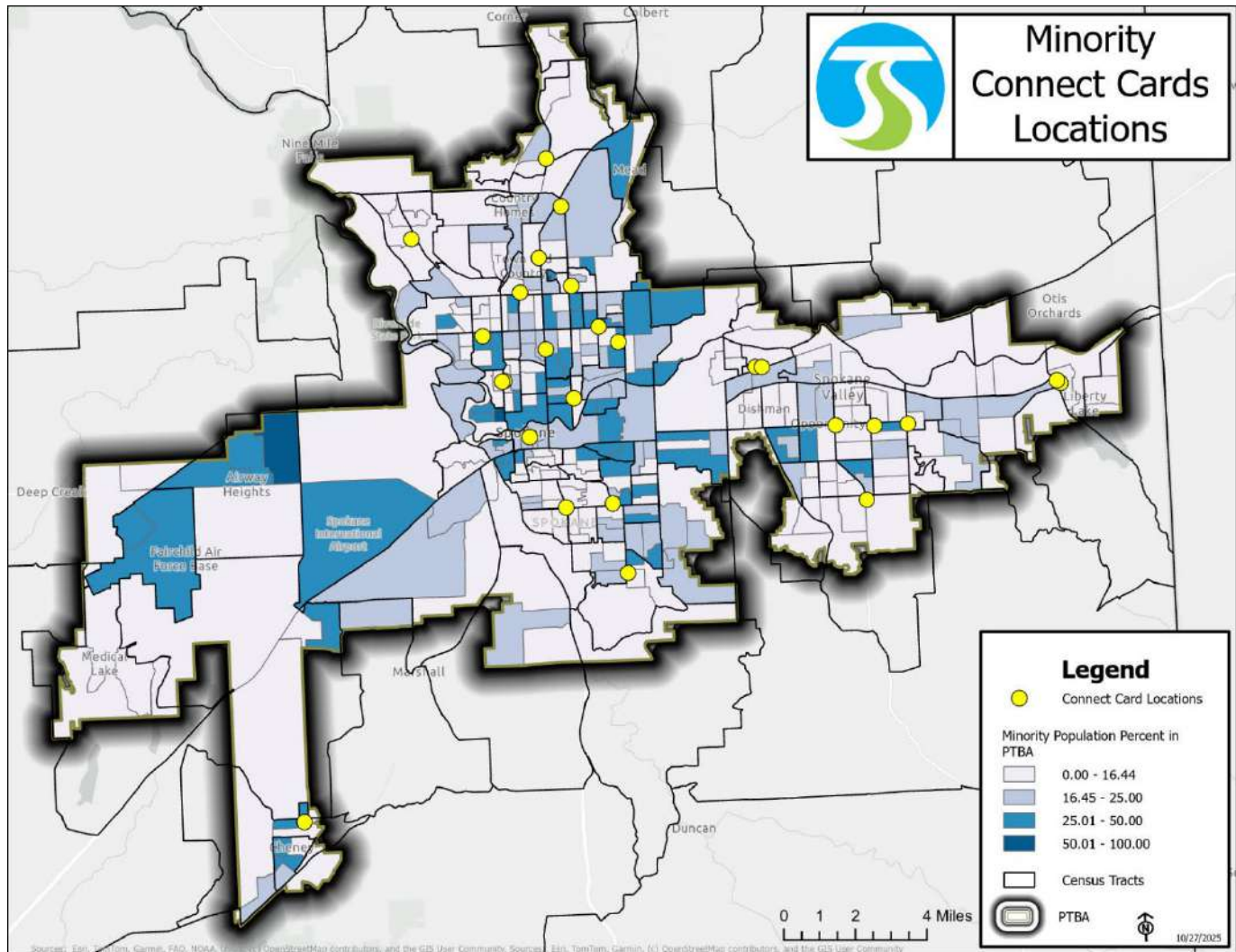
Table 3: Cash Fare Use by Minority Status

Cash Fare Use by Minority Status		
	Minority Riders	Non-Minority Riders
Reduced Fare Riders	44.3%	40.3%
Cash Fare	14.3%	11.9%
Total	58.6%	52.2%

Reduced fare riders will be able to reload funds onto their account-based fare system (Connect system) at multiple locations, including partner retail locations. Reduced fare riders who choose to pay fare with cash may

reload their Connect account at partner retail locations, allowing them to take advantage of daily and monthly fare capping with cash or other preferred payment type. Map 1 below shows all retail locations and census tracts with minority populations.

Map 1: Retail Locations and Minority Populations



Source: 2019-2023 American Community Survey

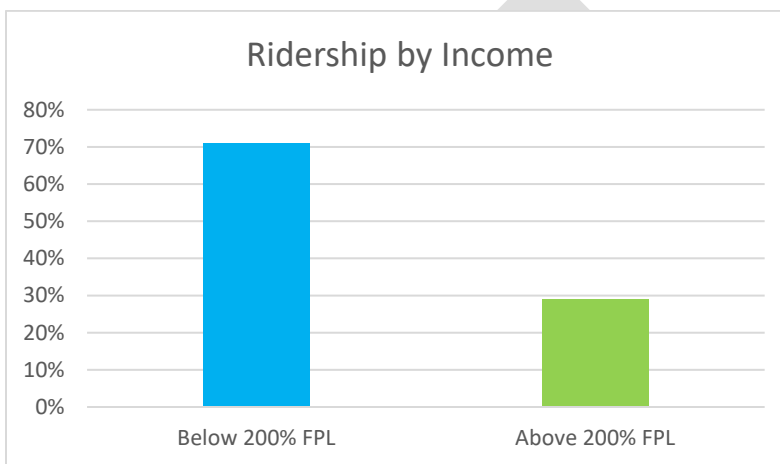
Disparate Impact Analysis Conclusion

STA analyzed and evaluated the fare policy revision to include the low-income reduced fare pilot program, and inclusion of a photo identification card for all reduced fare riders paying cash on the bus. **Thus, STA finds no Disparate Impact on minority populations under the low-income fare pilot program proposal.**

Disproportionate Burden Analysis

To qualify for the low-income fare discount, a rider’s household income must be at or below the 200% Federal Poverty Level (FPL). The first level of the disproportionate burden analysis will look at ridership by income status. As shown in Figure 1, the 2024 Customer Satisfaction Survey indicated that the percentage of trips made by riders at or below 200% FPL is 71%, exclusive of eligibility for other reduced fare programs. A total of 33% of surveyed riders will be eligible for the low-income fare program. If a rider is eligible for other reduced fare programs, their enrollment will be prioritized for reduced fare in other categories to maintain eligibility beyond the low-income fare pilot period (Honored Rider and Stars and Stripes). In other words, low-income riders will benefit from the introduction of a low-income fare pilot program.

Figure 1: Ridership, above and below 200% Federal Poverty Level



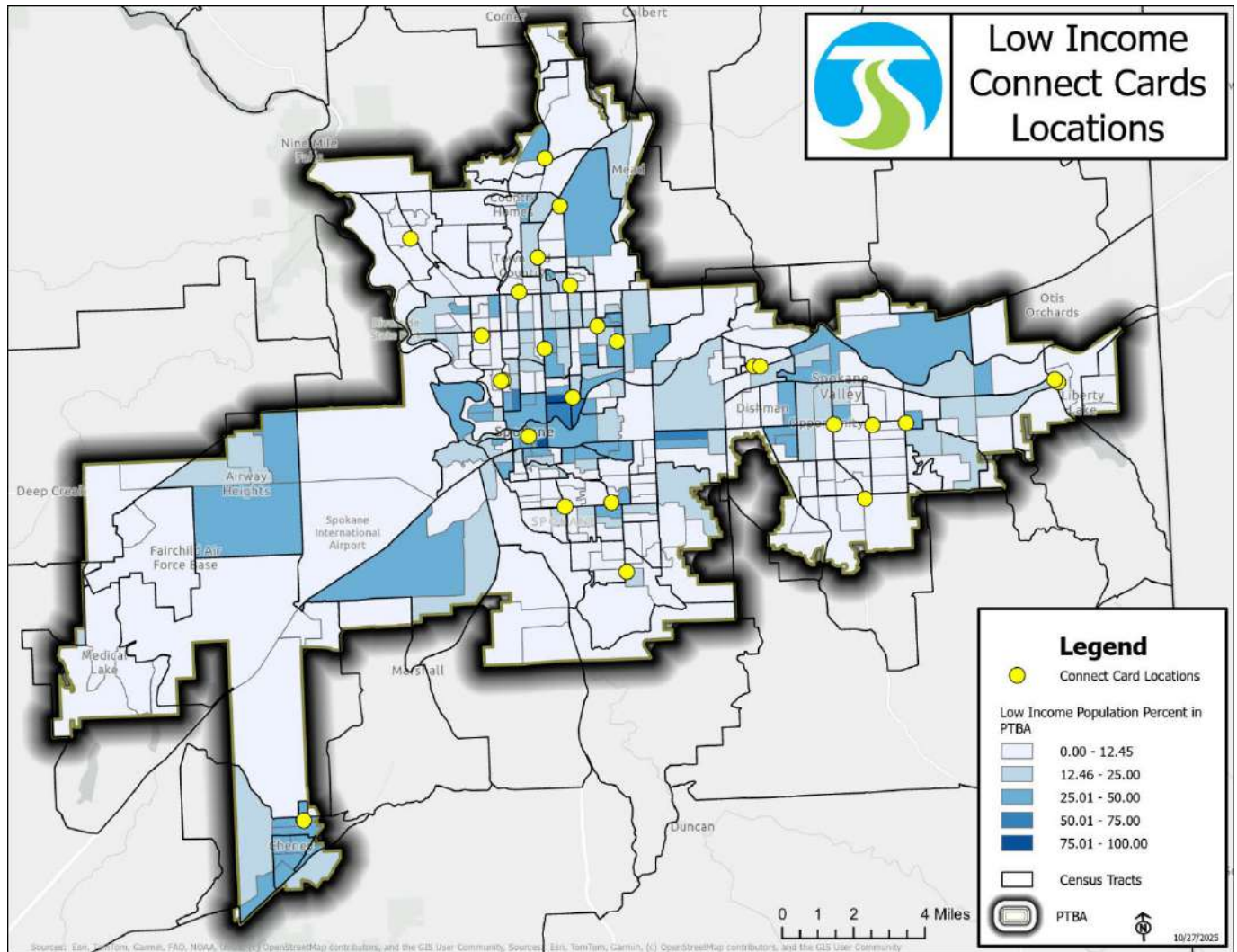
The 2025 Title VI Rider Census indicates that 40.3% of overall riders use reduced fare, while 37.8% of low-income riders use a reduced fare. A total of 11.9% of overall riders pay fare with cash on the bus, while 13.5% of low-income riders pay fare with cash on the bus. In other words, Table 4 shows a greater amount of low-income riders would be positively affected by using the reduced fare program along with using the account-based fare collection system, while also enabling riders to take advantage of daily and monthly fare capping. Low-income riders using cash on the bus will also be required to obtain the new photo ID card for verification of eligibility for reduced fare.

Table 4: Cash Fare Use by Low-income Status

Cash Fare Use by Low-income Status		
	Low-income Riders	Non Low-income Riders
Reduced Fare Riders	37.8%	40.3%
Cash Fare	13.5%	11.9%
Total	51.3%	52.2%

Reduced fare riders will be able to reload funds onto their account-based fare system (Connect system) at multiple locations, including partner retail locations. Reduced fare riders who choose to pay fare with cash may reload their Connect account at partner retail locations, allowing them to take advantage of daily and monthly fare capping. Map 2 below shows all retail locations and census tracts with low-income populations.

Map 2: Retail Locations and Low-income Populations



Source: 2019-2023 American Community Survey

Disproportionate Burden Analysis Conclusion

STA analyzed and evaluated the fare policy revision to include the low-income reduced fare pilot program, and inclusion of a photo identification card for all reduced fare riders paying cash on the bus. ***Thus, STA finds no Disproportionate Burden on low-income populations under the low-income fare pilot program proposal.***

DRAFT

SPOKANE TRANSIT AUTHORITY

BOARD MEETING OF

July 24, 2025

AGENDA ITEM 9D : LOW-INCOME FARE PILOT PROGRAM (RESOLUTION)

REFERRAL COMMITTEE: Board Operations Committee (*Speirs*)

SUBMITTED BY: Carly Cortright, Chief Communications & Customer Service Officer
Mike Tresidder, Senior Transit Planner

SUMMARY: Spokane Transit’s Connect 2035 Strategic Plan is the roadmap for investments and initiatives to maintain and improve public transportation infrastructure and services for our region through 2035. At the June committee meeting, staff provided an overview of three alternative program structures for the eligibility-based reduced fare program for riders experiencing low-income pilot. At the July meeting, staff will present the results of additional outreach and research and propose a recommended program pilot structure.

BACKGROUND: *Connect 2035* reached a significant milestone with the plan’s adoption at the December 19, 2024, STA Board meeting, while the sequencing timeline was adopted at the April 17, 2025, STA Board meeting, completing the last step in finalizing *Connect 2035*. The June PMER Committee meeting provided an overview of three alternative program structures and their potential impacts for discussion. The PMER Committee directed staff to continue pursuing a potential combination of two of these alternatives. After discussion, and with additional outreach to community-based organizations, a proposed pilot program structure has been identified below.

Proposed Pilot Program Structure		
	Option 1	Option 2
Pricing	50% of regular fare	50% of regular fare
Eligibility	50% AMI (housing based)	200% of Federal Poverty Level (FPL) (food/transportation based)
Verification	External partner verification with low-income housing provider	Primary – External partner verification Secondary - Internal STA verification
Enrollment	Pre-selected eligibility pool	Open

A full review of the different program options was presented by Dr. Cortright to the PMER Committee at the July 9, 2025, meeting. A summary of the presentation and discussion are included in the attached Staff Report.

STAFF’S RECOMMENDATION TO PMER COMMITTEE: Recommend the STA Board of Directors: 1) approve, by motion, the proposed structure of the Low-Income Fare Pilot Program; and 2) adopt, by resolution, an amendment to the fare structure to incorporate the Low-Income Fare.

COMMITTEE ACTION: Mr. Zappone made a motion to recommend STA Board of Directors: 1) approve, by motion, the proposed structure of the Low-Income Fare Pilot Program with allowing multiple ways of verification, including Basic Foods, Apple Health, and WIC; and 2) adopt, by resolution, an amendment to the fare structure to incorporate the Low-Income Fare. Mr. Speirs seconded. Mr. Zappone and Mr. Speirs voted yes. Mr. Cathcart and Mr. Kerns voted no. Tie vote fails and is forwarded to the Board Operations Committee.

STAFF'S RECOMMENDATION TO BOARD OPERATIONS COMMITTEE: Recommend the STA Board of Directors: 1) approve, by motion, the proposed structure of the Low-Income Fare Pilot Program; and 2) adopt, by resolution, an amendment to the fare structure to incorporate the Low-Income Fare.

COMMITTEE ACTION: Ms. Klitzke moved to recommend the Board approve Options 1 and 2 and have a periodic evaluation of options, and have the Performance Monitoring & External Relations evaluate once a year, and 2) adopt, by resolution, an amendment to the fare structure to incorporate the Low-Income Fare.

RECOMMENDATION TO BOARD: Approve Options 1 and 2 and have a periodic evaluation of options, and have the Performance Monitoring & External Relations evaluate once a year and adopt, by Resolution 845-25, an amendment to the fare structure to incorporate the Low-Income Fare.

FINAL REVIEW FOR BOARD BY:

Division Head // Interim Co-CEO KO/BRB Legal Counsel MC

Staff Report - Low-Income Fare Pilot Program Discussion at PMER:

Ms. Cortright provided an overview of the proposed Low-Income Fare Pilot Program, designed to enhance ridership and improve access while aligning with existing fare structures. The program focuses on income-based eligibility and seeks to balance broad participation with minimal operational disruption.

Key elements of the discussion included:

- **Eligibility Criteria:** Option 2, the recommended approach, utilizes open enrollment with verification through community partners. Eligibility would be based on income at or below 200% of the federal poverty level, with participation in the Basic Food Program serving as the primary qualifying standard due to its wide applicability.
- **Cost Estimates:** Preliminary projections for the pilot range from \$800,000 to \$3 million annually, contingent on the final enrollment strategy.
- **Operational Considerations:** Feedback from stakeholders emphasized the importance of streamlining access to benefits and minimizing administrative burdens. Ms. Cortright noted a preference for internal verification methods to reduce reliance on external partnerships and simplify program administration.
- **Program Timeline and Assessment:** The pilot would run for an initial three-year period to evaluate uptake, effectiveness, and scalability.
- **Budget and Staffing Constraints:** Current financial limitations may affect staffing and the scope of collaboration with agencies such as the Department of Social and Health Services (DSHS). A phased implementation approach was recommended to allow for the gradual addition of partnerships as the program evolves.

Discussion Points from PMER Committee on Low-Income Fare Pilot Program

- During the Committee's discussion of the Low-Income Fare Pilot Program, several suggestions and considerations were raised for potential next steps. These included conducting additional research and bringing findings to future meetings; gathering data on ridership and usage throughout the pilot to support regular reporting to the Board; and providing the Title VI analysis to Council Member Zappone that was distributed at the meeting for his further review as he attended virtually.
- The Committee also discussed the possibility of initiating conversations with the Department of Social and Health Services (DSHS) after the pilot is underway, as well as exploring multiple eligibility pathways for reduced fares—such as participation in the Basic Food Program, Medicaid/Apple Health, or WIC.
- There was interest in the idea of combining elements of Options 2 and 3 into a cohesive pilot structure. Additionally, members suggested refining the draft resolution to clarify how each option—Options 1, 2, and 3—could be implemented, and to consider including language that would allow for future partnerships without requiring additional Board reauthorization.

After extensive discussion, the committee voted on an amended motion as identified in the cover sheet

Following the 2-2 vote, legal counsel asked for clarification regarding which Alternative the motion spoke to, given the intended language and the effect of the amendment and was told it was intended to incorporate Alternatives 1, 2, and 3 with the caveat that Alternative 2 would be implemented gradually, and to expand verification options with partnerships as available.

Draft Title VI Equity Analysis

Proposed Fare Policy Revisions: Reduced Fare for Riders with Low Incomes

Draft

7/1/2025



Spokane Transit assures nondiscrimination in accordance with Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act. For more information, see www.spokanetransit.com. Upon request, alternative formats of this information will be produced for people who are disabled. Please call (509) 325-6094 (TTY Relay 711) or email ombudsman@spokanetransit.com.

DRAFT

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DRAFT

Section I: Introduction

As Spokane Transit Authority (STA) begins implementation of *Connect 2035*, the 10-year plan that is the strategic roadmap for bus, Paratransit, and Rideshare services through 2035, it is implementing a pilot program for a reduced fare program for riders experiencing low incomes, which will provide new benefits and greater convenience for riders. These benefits are further described in the proposed fare policy revisions which introduces an account-based system with durable fare cards and a mobile ticketing application.

This report documents STA's Title VI equity analysis of the proposed fare policy revisions which will guide implementation of the pilot program for a reduced fare program for riders experiencing low incomes. Upon completion of this fare equity analysis, staff shall brief the Board of Directors prior to the Board's action(s). STA will keep this analysis on file and available for review by the Federal Transit Administration (FTA) and the general public.

The fare equity analysis was performed in accordance with the requirements specified in the Federal Transit Administration (FTA), Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients and STA's 2020 Title VI Program and the policies outlined in STA's Comprehensive Plan, *Connect Spokane, A Comprehensive Plan for Public Transportation*.

Fare Policy Revisions Objectives and Overview

The objectives of the revisions are to incorporate a new pilot reduced fare program for riders experiencing low incomes, thus broadening the current discount programs to encourage ridership and to enhance access and equity.

Spokane Transit Authority (STA)

Description of Fleet and Services

Spokane Transit Authority is a regional public transportation agency providing a variety of transportation services, including fixed-route, Paratransit, and Vanpool service. In 2024¹ Spokane Transit's fixed route system provided 10,166,876 unlinked passenger trips and traveled 7,146,245 revenue miles. Paratransit provided 390,956 passenger trips and traveled 2,485,326 revenue miles. Rideshare provided 103,270 passenger trips and traveled 1,096,062 revenue miles.

STA's 2020 fleet includes 158 active fixed route coaches, 102 active Paratransit vans and 87 active rideshare. Fixed Route Bus Service operates 51 routes, 365 days a year. In accordance with the Americans with Disabilities Act (ADA), all vehicles are lift or ramp equipped.

Paratransit Service is operated by STA and its contractor for people who qualify under the eligibility requirements of the ADA. Paratransit service is provided within a defined service area, during the same hours and days as fixed route service and in compliance with applicable state and federal laws for service to people whose disability

¹ Spokane Transit is providing 2024 NTD and fixed route service and maintenance data (unless otherwise noted)

prevents them from using Fixed Route bus service. The directly operated Paratransit fleet is comprised of 70 vehicles, each with a capacity for up to 15 passengers. Contracted transportation supplements service during the early mornings, nights and weekends as well as augments capacity during weekdays.

Vanpool (Rideshare) Service augments STA's public transportation system through the assignment of passenger vans to vanpool groups. A vanpool group can be formed by a group of five to 15 people whose origin or destination is within the STA service area.

Areas Served

Areas served include cities of Airway Heights, Cheney, Liberty Lake, Medical Lake, Millwood, Spokane, and Spokane Valley and some unincorporated areas of Spokane County. Services include connections between downtown Spokane and the Spokane International Airport, major shopping malls, area colleges and universities, and Fairchild Air Force Base. Spokane Transit Authority (STA) operates within the designated Public Transportation Benefit Area (PTBA) which encompasses approximately 248 square miles of Spokane County which includes approximately 459,007 residents or 84.8 percent of the county population.

STA's Title VI Policy Development

Title VI of the Civil Rights Act of 1964 (Title VI) requires public transportation providers that receive federal funds to operate services and programs in a non-discriminatory manner. Race, color, and national origin are protected classes under Title VI. Low-income populations are not a protected class under Title VI; however, the FTA requires transit providers to evaluate the impacts of any fare changes on low-income populations as well.

STA's Fare Change Minority Disparate Impact Policy and Fare Change Low-Income Disproportionate Impact Policy were developed with an extensive public outreach effort. Letters were sent to a wide range of Limited English Proficiency (LEP) and nonprofit organizations as well as community centers and government agencies in early 2013 and early 2014. A public hearing was held to gather public comments. The 2014 Title VI update and policies were adopted by the Spokane Transit Board of Directors in early 2014. These policies continue to serve the agency and were incorporated into the 2024 *Connect Spokane* update and the 2023 Title VI Program.

Section II. Proposed Fare Policy

STA periodically evaluates its fare policy and fare structure. The last major review of the fare structure was conducted in 2022 and led to the Connect fare program.

Spokane Transit is proposing a pilot for a reduced fare program for riders experiencing low incomes in households at or below 200 percent of the federal poverty level, enabling them to ride STA at a reduced fare rate. This is a pilot program that comes directly out of *Connect 2035*. The 2024 update to *Connect Spokane* added Revenues and Fare Policy 2.6 Eligibility-based Fare Programs, which outlines the purpose of the policy, as well as criteria for any proposed program:

STA supports opportunities for individuals to use public transportation at a discounted cost based on targeted eligibility criteria and rigorous due diligence.

Opportunities for individuals to use public transportation should be made available through eligibility-based fare programs that offer customer-facing discounts. Eligibility determination and classifications will be made by the STA Board of Directors and identified in STA's existing fare structure. Prior to the creation and implementation of any eligibility-based fare program, the Board shall conduct an evaluation to determine if the proposed program can meet the following criteria:

- The program and the basis for eligibility is relatively simple to describe and understand, particularly for those who are prospective participants.
- The discount offered by the program considers proportionate costs and benefits relative to other eligibility-based fare programs, as well as other fare partnerships and rates
- Insofar as possible, the program adheres to eligibility requirements that can be determined with verifiable public information without the creation of storage by STA of sensitive health or income information.
- The program can be deployed without undue burden on STA operations or community partners.
- The program provides safeguards against abuse.
- The program has a method for reporting performance.
- The estimated ridership and financial impacts of the proposed program have been estimated and reasonably understood as far as STA's commitment to community benefit and fiscal accountability.

Preliminary research on existing low income transit fare programs helped identify best practice approaches as well as their applicability to the Spokane metro area. The research served as the basis for developing recommendations and parameters for a pilot reduced fare program for riders experiencing low incomes. This program will help STA maintain and expand service to meet the transit needs of low-income populations in Spokane Transit's service area.

Section III. Fare Equity Analysis

Title VI of the Civil Rights Act of 1964 requires public transportation providers that receive federal funds to operate services and programs in a non-discriminatory manner. Race, color, and national origin are protected classes under Title VI.

To fulfill the requirements of Executive Order 12898 and DOT Order 5610.2(a) on Environmental Justice, FTA requires that an impact analysis be conducted to identify any disproportionate burdens to low-income populations that would occur as a result of a major service or fare change. Low-income populations are not a protected class under Title VI. However, Chapter IV-18 of the Title VI Circular states that “transit providers should take steps to minimize or mitigate impacts (for this population) where practical. The provider should also describe alternatives available to low-income passengers affected by service changes.”

STA’s Title VI policy, adopted in early 2014, identifies how STA assesses disparate impact and disproportionate burden that could potentially result from changes to fare policy.

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.

Low-Income Disproportionate Impact Policy

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.

An overview of the proposal, and the results of the analysis, follows.

Overview of Fare Policy Revisions

STA is proposing a pilot for a reduced fare program for riders experiencing low incomes. The current and proposed fares by fare type are shown in Table III-1. The change would reduce all adult fare categories (One Ride, Daily Farecapping, and Monthly Farecapping) for eligible low income riders to half the price (50%) of Adult fare. After the decrease, the low Income fare would align with Honored Rider and Stars & Stripes fare types.

Table III-1: Proposed Low Income Fare Changes for Adult Fares

	Current Adult Fare	Proposed Adult Fare
One Ride	\$2.00	\$1.00
Farecapping (Daily)	\$4.00	\$2.00
Farecapping (Monthly)	\$60.00	\$30.00

The low income fare pilot program will be a fare designation available to persons who are determined by STA and its verification partners to meet the eligibility requirements for a reduced fare because the person can appropriately document that their annual income is at or less than 200% of the federal poverty level (FPL). The FPL is the most commonly used criterion to determine eligibility and benefits for economic support programs at the federal, state and local level. The Census Bureau sets poverty thresholds annually using a nationally representative survey and then the Department of Health and Human Services (HHS) simplifies the thresholds to set federal poverty guidelines, with adjustments for family size.

Data Sources

The 2024 Customer Satisfaction Survey collected fare payment and demographic data necessary to conduct a fare equity analysis consistent with the policies described earlier in this report.

Disparate Impact Analysis

The first level of the Disparate Impact analysis is a determination of how eligible trips compare to non-eligible trips in terms of racial/ethnic minority status within each group. Eligible riders are defined as those with a household income at or below 200 percent of the federal poverty level, which is a requirement for the Low Income Fare Program. The proportion of the STA service area population that minorities represent is 14.4%. As shown in Table III-2, the share of program eligible trips taken by minority riders (72.6%) is significantly greater than non-eligible trips taken by minority riders (27.4%). In other words, a greater percentage of minority riders would be positively affected (i.e., eligible trips) by the fare change than the percentage of minority riders on STA services as a whole. Conversely, a lower percentage of higher income minority riders would experience no impact by the proposed changes since fares would remain the same. This indicates that the proposal to decrease Adult fares for eligible income riders would not disproportionately impact minority riders.

Table III-2: Comparison of Eligible and Non-eligible Trips, by Minority Status

	Ridership [^]	
	Minority Riders	Non-Minority Riders
Eligible Trips	72.6%	69.9%
Non-eligible Trips	27.4%	30.1%
Total	100%	100%

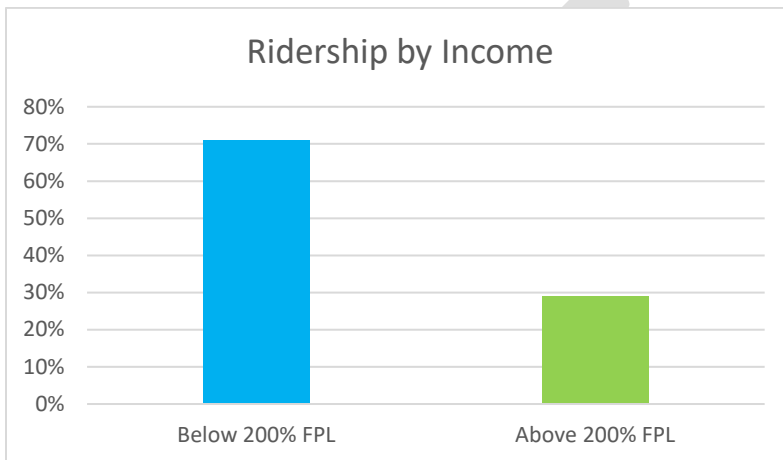
[^] respondents who responded to the household income question with “don’t know” or “prefer not to say”, as well as those respondents who did not answer the number of people in the household were excluded from this analysis due to lack of data

Thus, STA finds no potential Disparate Impact on minority populations under the Low Income Fare Pilot Program proposal.

Disproportionate Burden Analysis

To qualify for the low income fare discount, a rider's household income must be at or below the 200% Federal Poverty Level (FPL). The first level of the disproportionate burden analysis will look at ridership by income status. As shown in Figure III-1, the percentage of trips made by ridership at or below 200% FPL is 71%, exclusive of eligibility for other reduced fare programs. 33% of surveyed riders will be eligible for the low income fare program while not being eligible for other reduced fare programs (Honored Rider, Stars and Stripes). In other words, low-income riders stand to benefit from the introduction of a Low Income Fare Pilot Program.

Figure III-1: Ridership, above and below 200% Federal Poverty Level



Thus, STA finds no potential Disproportionate Burden on low-income populations under the Low Income Fare Pilot Program proposal.

RESOLUTION NO. 845-25

A RESOLUTION FOR THE PURPOSE OF REVISING THE SPOKANE TRANSIT AUTHORITY TARIFF POLICY AND PROCEDURES FOR FIXED ROUTE AND PARATRANSIT

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, the STA Board of Directors is the legislative body of the Spokane County Public Transportation Benefit Area; and

WHEREAS, pursuant to RCW 36.57A.090(3), the STA Board of Directors shall have the power to fix rates, tolls, fares and charges for the use of public transit services and facilities; and

WHEREAS, on January 21, 2022 the STA Board of Directors adopted resolution No. 791-22, approving the current STA Tariff Policy; and

WHEREAS, on September 28, 2022 the STA Board of Directors adopted resolution No. 801-22, updating the current STA Tariff Policy to revise the fare structure for riders age 18 and younger to access available grant funding made available through Move Ahead Washington legislation; and

WHEREAS, on December 19, 2024 the STA Board of Directors adopted resolution No. 831-24, adopting a new strategic plan for the delivery of public transportation service to succeed STA Moving Forward upon its completion and through the year 2035, entitled Connect 2035; and

WHEREAS, on October 21, 2021 the STA Board of Directors adopted the Community Access Pass (CAP) program, which is a discounted fare program for eligible non-profit human service agencies to purchase single use fare passes to provide at no cost to their program participants; and

WHEREAS, an initiative identified within Connect 2035 was to pilot a reduced fare program for riders experiencing low incomes; and

WHEREAS, as a pilot, this reduced fare program will run for a period of not more than three (3) years; and

WHEREAS, STA has conducted an equity analysis of the fare policy changes resulting from an update to its Tariff Policy to incorporate a reduced fare pilot program for riders experiencing low incomes pursuant to Title VI of the Civil Rights Act; guidance promulgated by the Federal Transit Administration, related policies within *Connect Spokane* and STA's current Title VI Program; and

WHEREAS, STA finds that the fare policy changes do not pose a disparate impact or a disproportionate burden on populations identified in the above-referenced statutes, guidance, and policies; and

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

- Section 1. The STA Board of Directors establishes a new eligibility-based fare program. The following are eligible for this fare program:
- A. Individuals residing in housing managed by or receiving a housing voucher from the Spokane Housing Authority;
 - B. Individuals whose income is at or below 200% of the Federal Poverty Level (FPL) and receive Basic Food benefits managed by the Washington State Department of Social and Health Services; or
 - C. Individuals whose income is at or below 200% of the Federal Poverty Level and are determined to be eligible based on other appropriate documentation.

This new fare program is considered a pilot program that shall run for the shorter of a period of two (2) years from commencement or when the program expenditures meet \$1,140,000. This program expressly has a cap on expenditures of \$1.14M, and will be subject to annual reporting on utilization and overall effectiveness, and subject to adjustments as may be directed by the Board.

- Section 2. The STA Board of Directors hereby revises the rates, tolls, and fares identified in the Fixed Route and Paratransit Fares, Vanpool Fares, and Special Event Fares, a copy of which is attached hereto and incorporated herein as "Exhibit A".
- Section 3. Resolution No. 801-22 and all amendments thereto, is hereby revoked, rescinded, and superseded by this Resolution as of its effective date.
- Section 4. This Resolution shall become effective upon its date of adoption and shall remain in full force and effect until revised by Board resolution; provided, the Chief Executive Officer is hereby authorized to implement the effective date of the rates, tolls, and fares identified in Exhibit A.

ADOPTED by STA at a regular meeting thereof held on the 24th day of July 2025.

Attest:



Dana Infalt
Clerk of the Authority



Lance Speirs
STA Board Chair *Pro Tempore*

Approved as to form:



Megan Clark
Legal Counsel

EXHIBIT A

Fixed Route and Paratransit Fares (currently in effect)

GENERAL PUBLIC Fare Type	Standard Fare (1)	Reduced Fare (2)					Paratransit (3)
		Rider-In-Training (6-12 years)	Rider's License (13-18 years) (7)	Student	Honored Rider	Stars & Stripes	
One Ride (4)	\$ 2.00	Zero Fare	Zero Fare	\$ 2.00	\$ 1.00	\$ 1.00	\$ 2.00
Farecapping - Daily (5)	\$ 4.00	N/A	Zero Fare	\$ 4.00	\$ 2.00	\$ 2.00	\$ 4.00
Farecapping - Monthly (6)	\$ 60.00	N/A	Zero Fare	\$ 48.00	\$ 30.00	\$ 30.00	\$ 60.00
7-day Rolling Pass	\$ 17.00	N/A	N/A	N/A	N/A	N/A	N/A
Summer Youth Pass (7)	N/A	N/A	Zero Fare	N/A	N/A	N/A	N/A
Shuttle Park (8)	\$ 40.00	N/A	N/A	N/A	N/A	N/A	N/A

GROUP SALES (8) Fare Type	Standard Fare (1)	Reduced Fare (2)	Paratransit (3)
Two-Hour Pass	\$ 2.00	\$ 1.00	\$ 2.00
Day Pass	\$ 4.00	\$ 2.00	\$ 4.00
7-day Rolling Pass	\$ 17.00	N/A	N/A
Monthly Pass	N/A	N/A	\$ 60.00
31-day Rolling Pass	\$ 60.00	\$ 30.00	N/A

- (1) Children under six years of age ride free and must be accompanied by an adult, youth, or student reduced fare or paratransit passenger
- (2) Reduced Fare programs require verification of eligibility.
- (3) Personal Care Assistant (PCA) rides free on Paratransit or Fixed Route with paid paratransit rider (needs no identification, however, the person with whom they are traveling must have "PCA" on their ADA paratransit identification card)
- (4) Allows for travel up to two (2) consecutive hours after initial validation
- (5) Maximum fare charged per day when paid with a smart card or mobile app
- (6) Maximum fare charged per calendar month when paid with a smart card or mobile app
- (7) Through the Washington State Transit Support Grant, all Youth Fares to Age 18 will be at no-cost to the rider so long as the Transit Support Grant is in place. If the Transit Support Grant is rescinded or not renewed, Youth Fares will be reinstated at their previously approved levels.
- (8) Includes parking at a designated parking lot, as stipulated in the Shuttle Park pass agreement
- (9) Limited use fare types available for quantity purchases only and not available to the general public

Fixed Route and Paratransit Fares (effective when Opportunity fare put into service)

GENERAL PUBLIC Fare Type	Standard Fare (1)	Reduced Fare (2)						Paratransit (3)
		Rider-In-Training (6-12 years)	Rider's License (13-18 years) (7)	Student	Honored Rider	Stars & Stripes	Opportunity (10)	
One Ride (4)	\$ 2.00	Zero Fare	Zero Fare	\$ 2.00	\$ 1.00	\$ 1.00	\$ 1.00	\$ 2.00
Farecapping Daily (5)	\$ 4.00	N/A	Zero Fare	\$ 4.00	\$ 2.00	\$ 2.00	\$ 2.00	\$ 4.00
Farecapping Monthly (6)	\$ 60.00	N/A	Zero Fare	\$ 48.00	\$ 30.00	\$ 30.00	\$ 30.00	\$ 60.00
7-day Rolling Pass	\$ 17.00	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Summer Youth Pass (7)	N/A	N/A	Zero Fare	N/A	N/A	N/A	N/A	N/A
Shuttle Park (8)	\$ 40.00	N/A	N/A	N/A	N/A	N/A	N/A	N/A

GROUP SALES (8)			
Fare Type	Standard Fare (1)	Reduced Fare (2)	Paratransit (3)
Two-Hour Pass	\$ 2.00	\$ 1.00	\$ 2.00
Day Pass	\$ 4.00	\$ 2.00	\$ 4.00
7-day Rolling Pass	\$ 17.00	N/A	N/A
Monthly Pass	N/A	N/A	\$ 60.00
31-day Rolling Pass	\$ 60.00	\$ 30.00	N/A

- (1) Children under six years of age ride free and must be accompanied by an adult, youth, or student reduced fare or paratransit passenger
- (2) Reduced Fare programs require verification of eligibility.
- (3) Personal Care Assistant (PCA) rides free on Paratransit or Fixed Route with paid paratransit rider (needs no identification, however, the person with whom they are traveling must have "PCA" on their ADA paratransit identification card)
- (4) Allows for travel up to two (2) consecutive hours after initial validation
- (5) Maximum fare charged per day when paid with a smart card or mobile app
- (6) Maximum fare charged per calendar month when paid with a smart card or mobile app
- (7) Through the Washington State Transit Support Grant, all Youth Fares to Age 18 will be at no-cost to the rider so long as the Transit Support Grant is in place. If the Transit Support Grant is rescinded or not renewed, Youth Fares will be reinstated at their previously approved levels.
- (8) Includes parking at a designated parking lot, as stipulated in the Shuttle Park pass agreement
- (9) Limited use fare types available for quantity purchases only and not available to the general public
- (10) Program will commence during Q4 2025 and will be effective for a period no longer than 36 months from its initial start

Draft Title VI Site Equity Analysis

Facility Site Selection



Spokane Transit assures nondiscrimination in accordance with Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act. For more information, see www.spokanetransit.com. Upon request, alternative formats of this information will be produced for people who are disabled. Please call (509) 325-6094 (TTY Relay 711) or email ombudsman@spokanetransit.com.

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Study Purpose

The purpose of this study is to analyze possible locations for Spokane Transit Authority (STA) uses including but not limited to, maintenance, storage, and operations facilities. This analysis is intended to ensure locations are selected without regard to race, color, or national origin and identify potential adverse human health or environmental activities on minority and/or low-income populations. STA has identified a need to increase the amount of essential infrastructure to support storage, maintenance, and operations and relieve capacity conflicts at existing facilities.

STA provides public transportation services to areas within the Public Transportation Benefit Area (PTBA) that includes the cities of Airway Heights, Cheney, Liberty Lake, Medical Lake, Millwood, Spokane and Spokane Valley, as well as portions of unincorporated Spokane County. The Spokane PTBA encompasses an area of approximately 248 square miles and includes approximately 475,470 residents, nearly 85% of the total population of Spokane County. STA operates 52 routes, 5 transit centers, and 14 park-and-ride lots.

In December 2024, STA's Board of Director's adopted the agency's next 10-year strategic plan, *Connect 2035*. Key to implementing the strategic plan is the Facilities Master Plan (FMP) which is used to plan and program support infrastructure for new and/or expanded facilities, near-term needs, and growth over time. Phase 1 of the FMP identified smaller and moderately sized projects that advance the FMP and align with the strategic plan which includes property acquisition of opportunity sites to support future facilities and requirements.

In November 2022, Spokane Regional Transportation Council (SRTC) adopted the Coordinated Public Transit-Human Services Transportation Plan (HSTP) that includes Strategy 4: Capital Facilities and Vehicles, to protect significant investment in vehicle fleets through proper maintenance and protection from the elements when not in use.

The ability to expand services is directly correlated to the ability to maintain additional fleet and operations. STA's current facilities are at or nearing capacity but new or expanded facilities would support planned growth and ensure that vehicles and service are efficient.

Title VI Compliance

STA is committed to ensuring that no person is excluded from participation, or denied the benefits of its service on the basis of race, color, or national origin, according to Title VI of the Civil Rights Act. STA's current Title VI policies, pursuant to FTA C 4702.1B, are included in its Title VI Program, which also includes the steps for submitting a Title VI complaint.

According to Title 49 CFR Section 21.9(b)(3), "In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part." In addition, 49 CFR part 21, Appendix C, Section (3)(iv) states, "The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin." STA is required to conduct a Title VI equity analysis to ensure neither of

the possible site alternatives will cause a disparate impact in areas with a high minority population. Per guidance in FTA C 4702.1B, the analysis must:

- Include outreach to persons potentially impacted by the siting of the facility;
- Compare impacts of various siting alternatives;
- Determine if cumulative adverse impacts might result, due to the presence of other facilities with similar impacts in the area; and occur before the selection of the preferred site.

Additionally, FTAs regulatory guidance includes requirements to analyze impacts on environmental justice for specific activities and policies. Environmental justice evaluates whether a policy or activity will have a disproportionately high and adverse effect on minority and low-income populations. According to FTA C 4702.1B, the objective is to ensure that Federal agencies promote and enforce nondiscrimination as one way of achieving the overarching objective of environmental justice—fair distribution of the adverse impacts of, or burdens associated with, Federal programs, policies, and activities. In keeping with the intent of environmental justice, STA weighs the cumulative and project-specific impacts to low-income populations, just as it is required to do for minority populations. Therefore, this equity analysis will also include impacts to low-income populations.

Methodology

The steps outlined in this report were performed to site the essential infrastructure to support uses including but not limited to storage, maintenance, and operations and evaluate the potential impacts. Spokane Transit first established preliminary criteria required for each site, and evaluated various potential sites based on these criteria. Second, the potential impacts on the surrounding community were identified based on the physical and operational characteristics of the proposed essential infrastructure. Third, an analysis was completed to anticipate impacts related to the construction and operation of the proposed facilities. Finally, the minority and low-income composition of the area was calculated and compared to that of the Public Transit Benefit Area (PTBA) to determine if a disparate impact exists.

Siting Alternatives Analysis Criteria

Spokane Transit established the following criteria for maintenance, storage, and operations facilities:

1. **Operating Cost:** The operational costs consider the costs of operating the property such as maintenance, storage, and operations facilities. In addition, deadhead hours and miles, fuel, and driver time will be evaluated.
2. **Site Location:** The site location considers the factors associated with where the site is located and the surroundings of the area that could impact the maintenance, storage, and operations facilities. Proximity to existing STA facilities is an optimal siting criterion.
3. **Property Ownership:** Property ownership considers who owns the property and if the ownership could make siting the facilities more or less challenging. If the property is privately owned, consideration for if the property is for sale or has been for sale indicates the owner might be interested in selling.
4. **Zoning Classification:** The zoning classification is considered to ensure the site's use as maintenance, storage, and operations facilities is compatible with the permitted uses of the zoning district. Spokane Transit will begin design and construction of the facilities quickly and the need for a rezone of a property would delay the process.

5. Traffic Conditions: The traffic conditions surrounding the site could impact the ability of the site to be used as maintenance, storage, and operations facilities.

Site Descriptions

Spokane Transit reviewed various sites that potentially would meet the requirements of infrastructure to support storage, maintenance, and operations and relieve capacity conflicts at existing facilities.

Below is a description of the sites reviewed:

Boone Site

This site contains three adjacent parcels with approximately 0.61 acres of land located on the southwest corner of Boone Avenue and Cedar Street. It is located adjacent to STA's Boone campus that includes transit vehicle storage buildings, STA administration offices, Paratransit office, and employee parking lots. Currently there are two 12-unit conversion apartment buildings (constructed in 1905) and a two-to-four-unit dwelling (constructed in 1901).

The current zoning and land use designation of these sites are Light Industrial. Adjacent parcels are zoned Light Industrial/Institutional (LI), and Office (O-35) that includes two 12-unit built-as apartment buildings, two pole buildings, and dwelling units.

Union Site

This site contains four adjacent parcels with approximately 4.69 acres of land located on the northwest corner of Union Road and Sprague Avenue, just one block to the east of STA's existing maintenance and operations base. Currently, there is a two-story warehouse building (constructed in 2002), an office building (constructed in 1955), and a garage/shop building (constructed in 1972).

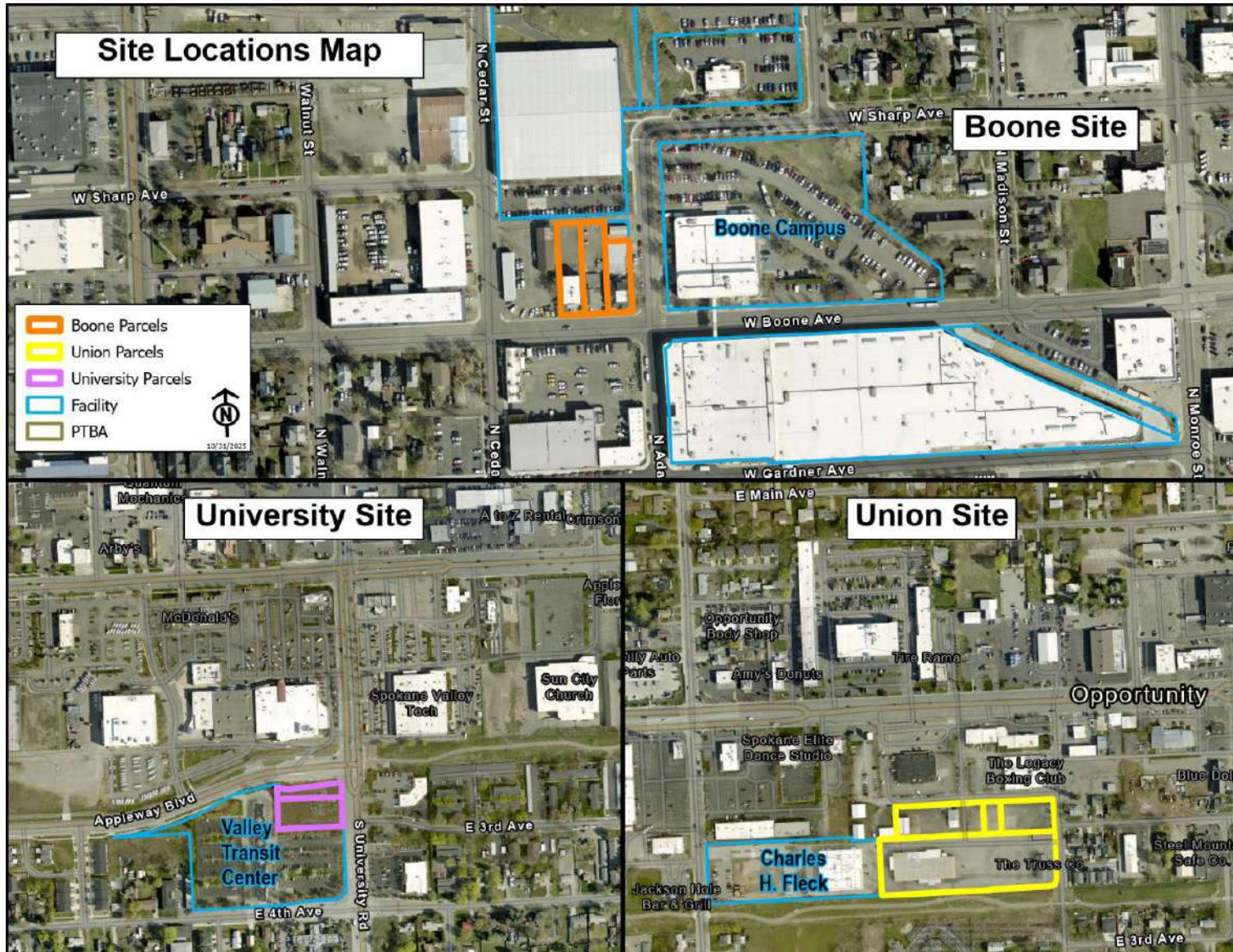
The City of Spokane Valley's current zoning and land use designation for the parcels is Corridor Mixed Use (CMU). Adjacent parcels are zoned CMU and Parks and Open Space. The office-zoned land to the west of the site is the Fleck Center owned by STA and includes an office building and a fixed route garage on site. To the east is a residential area. North of this site a United States Postal Service location and mixed-use building. Land to the south is zoned P/OS for the Appleway Trail and is owned by Spokane County.

University Site

This site contains two adjacent parcels and is located on 0.98 acres of vacant land located on the northeast corner of University Road and Appleway Boulevard. The site is located directly northeast of STA's existing Valley Transit Center and park and ride.

The current zoning of the parcel on the site is Corridor Mixed Use (CMU). Adjacent parcels are zoned CMU and Parks and Open Space (P/OS). The CMU zoned land to the north and east of the site includes retail store buildings. Land to the northeast is zoned P/OS for the Appleway Trail and is owned by Spokane County.

Map 1: Site Locations Map



Individual Site Analysis

Each site was evaluated on the criteria established. Below is the evaluation:

Table 1: Individual Site Analysis

	Boone Site	Union Site	University Site
Operating Cost	The site would be cost effective. Staff and resources could be shared due to the proximity of the site to the existing maintenance and operation facility. The site is 1.1 miles from the STA Plaza, which is a low number of deadhead miles.	The site would be cost effective. Staff and resources could be shared due to the proximity of the site to the existing maintenance and operation facility.	The site would be cost effective. Staff and resources could be shared due to the proximity of the site to the existing Valley Transit Center.
Site Location	The proximity to the Boone maintenance and operations facility since 1985 allows for expanded public transit activities. The site is surrounded by complimentary institutional uses.	The proximity to the STA's existing Fleck maintenance and operations facility in operation since 1990 allows for expanded public transit activities. The site is surrounded by complimentary institutional uses.	The proximity to the Valley Transit Center in operation since 1989 allows for ease of expanded public transit activities. The site is surrounded by complimentary institutional uses.
Property Ownership	Willing seller.	Willing seller.	Willing seller.
Zoning Classification	The zoning classification, Light Industrial, is compatible with adjacent STA land uses.	The zoning classification, Corridor Mixed Use, is compatible with adjacent STA land uses.	The zoning classification, Corridor Mixed Use, is compatible with adjacent STA land uses.

Site and Criteria Conclusions

After reviewing the properties, all three sites met STA's criteria and cost constraints for the essential infrastructure to support storage, maintenance, and operations. The proximity of the STA site to the current Boone facility, Fleck operations and maintenance facility, and the Valley Transit Center optimizes the resources of each facility and minimizes operating costs. STA is in the planning stages for the acquisition of properties for each site. The zoning classification of Light Industrial and Corridor Mixed Use is compatible with the site's use as infrastructure and facilitates the permitting and construction of the facility.

Equity Analysis

Census data was used to determine the racial and income composition of each site and the surrounding census tracts to compare demographics. The sources of data used are as follows:

- The Spokane County Scout tool was used to generate data for each of the potential sites.

- Total population data was collected from Census 2020 decennial data, Demographic and Housing Estimates (Table DP05).
- LEP (Limited English Proficiency) data was collected from Census 2023 5-year American Community Survey Data, Age By Language Spokane At Home By Ability to Speak English For the Population 5 years and Over table (Table C16001)
- Minority data was collected from the Census 2023 5-year American Community Survey Detailed Race table (Table B02001).
- Low Income data was collected from Census 2023 5-year American Community Survey Median Household Income in The Past 12 Months (Table B17021).
- The 2024 Public Transportation Benefit Area (PTBA) total population estimate from the Office of Financial Management (OFM) was used to compare the race and income of each census tract.

Boone Site Demographic Characteristics

This site is located in City of Spokane, in the West Central Neighborhood. The site is located within Spokane County Census Tract 20, with a total population of 4,443 with 17% of residents in this tract classified as minority and 30.3% of individuals living below the federal poverty line. In Census Tract 20, 7.5% of people speak English “less than very well”, meaning that 7.5% of residents can be considered Limited English Proficient (LEP). The table below summarizes the population characteristics of the site and the surrounding area.

Table 2: Boone Site Demographics

Boone Site					
Census Tract #	20 (Site Location)	21	23	24	PTBA
Total Population	4,443	2,507	5,494	3,078	475,470
% Minority	17.0%	13.9%	26.9%	23.8%	16.4%
% Low Income	30.3%	5.0%	20.8%	39.5%	12.5%
Median HH Income	\$41,250	\$76,569	\$54,458	\$37,903	N/A
% LEP	7.5%	0.1%	3.9%	3.9%	2.8%

Union Site Demographic Characteristics

This site is located at the west boundary of the City of Spokane Valley, within Census Tract 126, which has a total population of 4,246 with 20.1% of its residents classified as minority, and 12.8% of its residents living below the poverty line. In Census Tract 126, 0.9% of people speak English “less than very well”, meaning that 0.9% of residents can be considered Limited English Proficient (LEP). The table below summarizes the population characteristics of the site and the surrounding area.

Table 3: Union Site Demographics

Union Site					
Census Tract #	126 (Site Location)	119	118	127.01	PTBA
Total Population	4,246	4,592	5,616	4,120	475,470
% Minority	20.1%	20.6%	9.5%	11.5%	16.4%
% Low Income	12.8%	18.7%	15.1%	7.4%	12.5%
Median HH Income	\$65,921	\$59,918	\$58,689	\$65,098	N/A
% LEP	0.9%	2.6%	1.8%	6.8%	2.8%

University Site Demographic Characteristics

This site is located at the west boundary of the City of Spokane Valley, within Census Tract 125. This tract has a total population of 4,212 with 29.16% of its residents classified as minority, and 20.65% of its residents living below the poverty line. In addition, 2.6% of residents speak English “less than very well”, meaning that 2.6% of residents can be considered Limited English Proficient (LEP). The table below summarizes the population characteristics of the site and surrounding area.

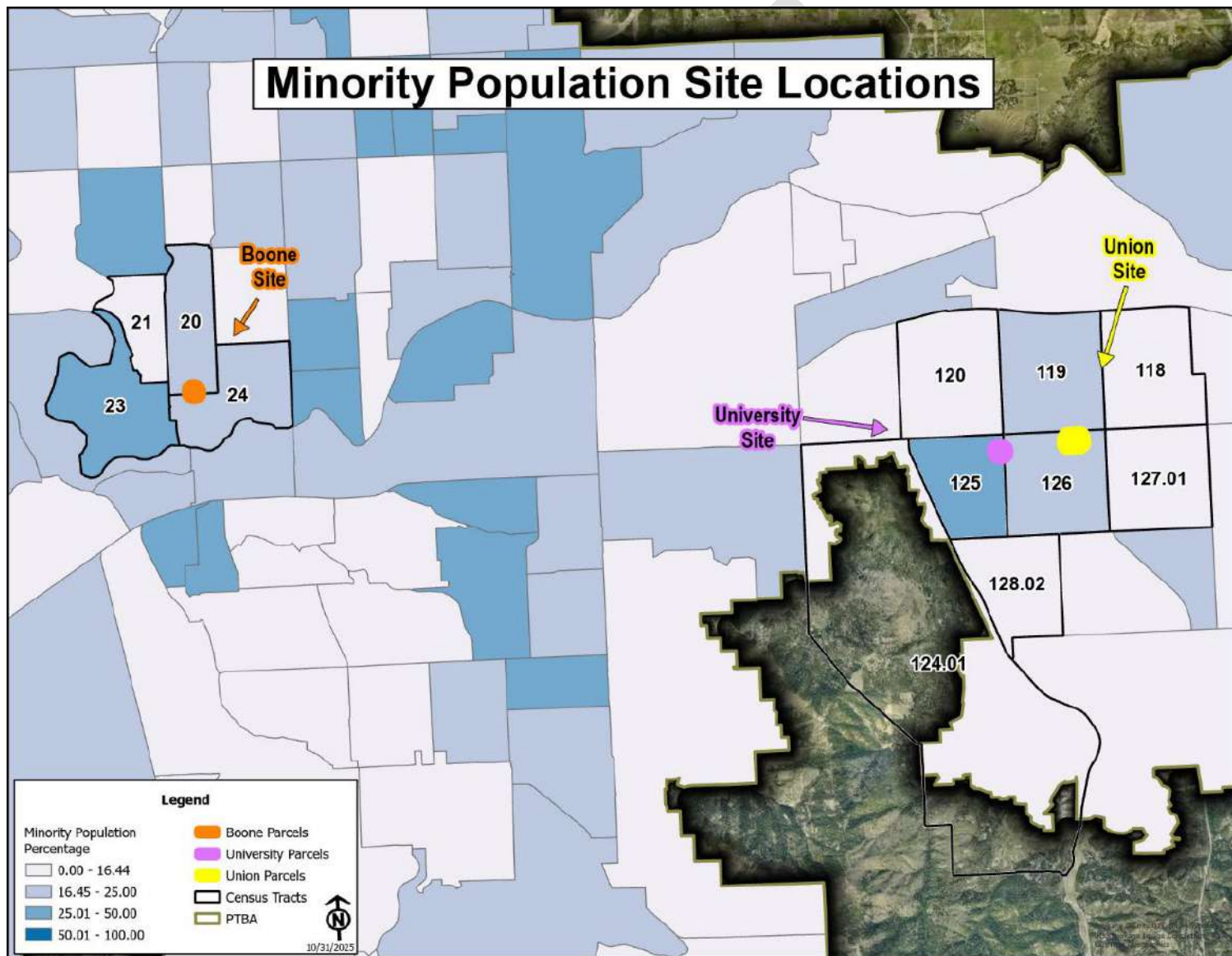
Table 4: University Site Demographics

Census Tract #	University Site				
	125 (Site Location)	120	124.01	128.02	PTBA
Total Population	4,212	4,190	4,898	3,444	475,470
% Minority	29.1%	9.5%	11.5%	14.4%	16.4%
% Low Income	20.6%	18.8%	4.8%	3.1%	12.5%
Median HH Income	\$65,068	\$56,066	\$117,440	\$91,458	N/A
% LEP	2.6%	1.1%	0.9%	4.8%	2.8%

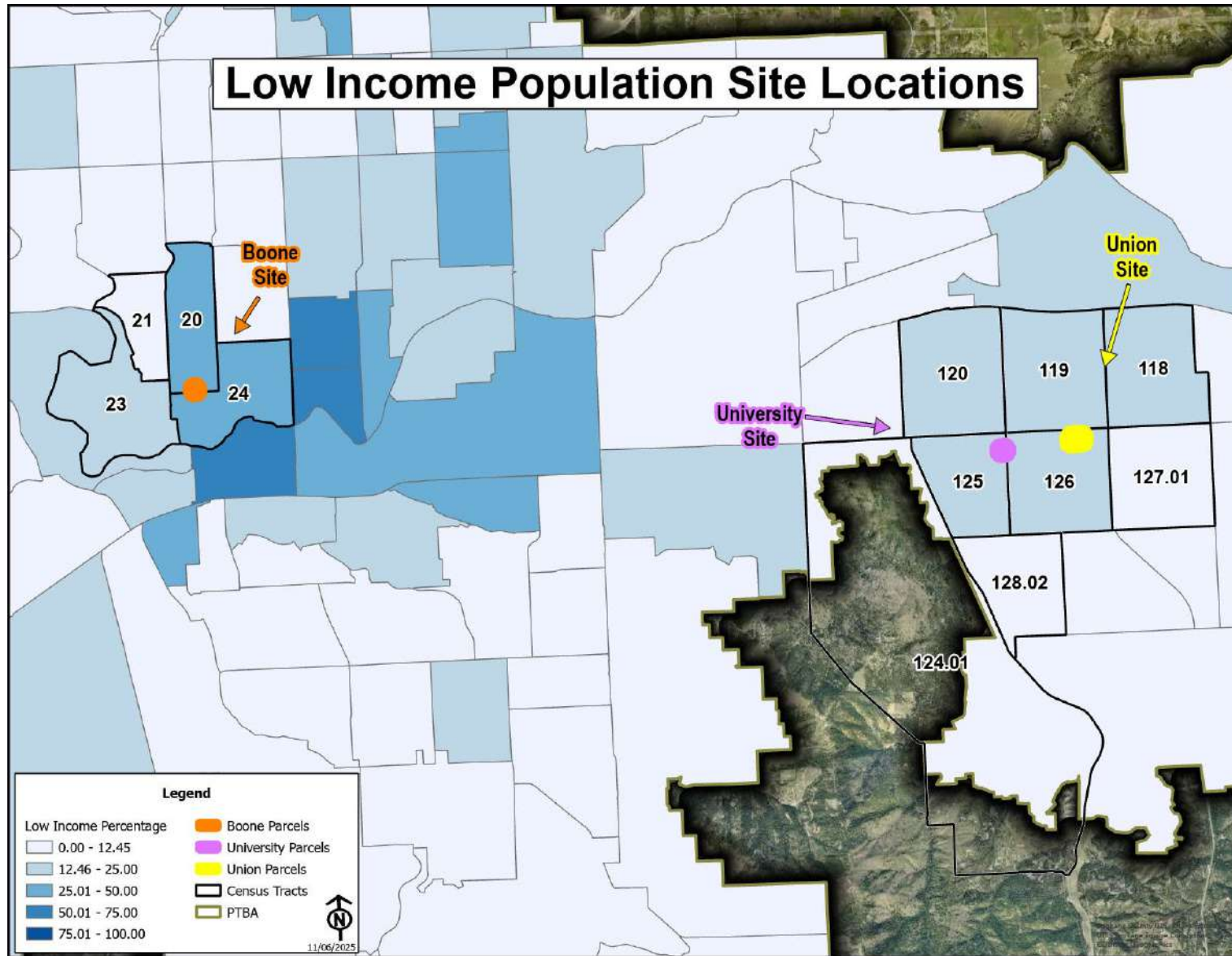
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Site Demographic Maps

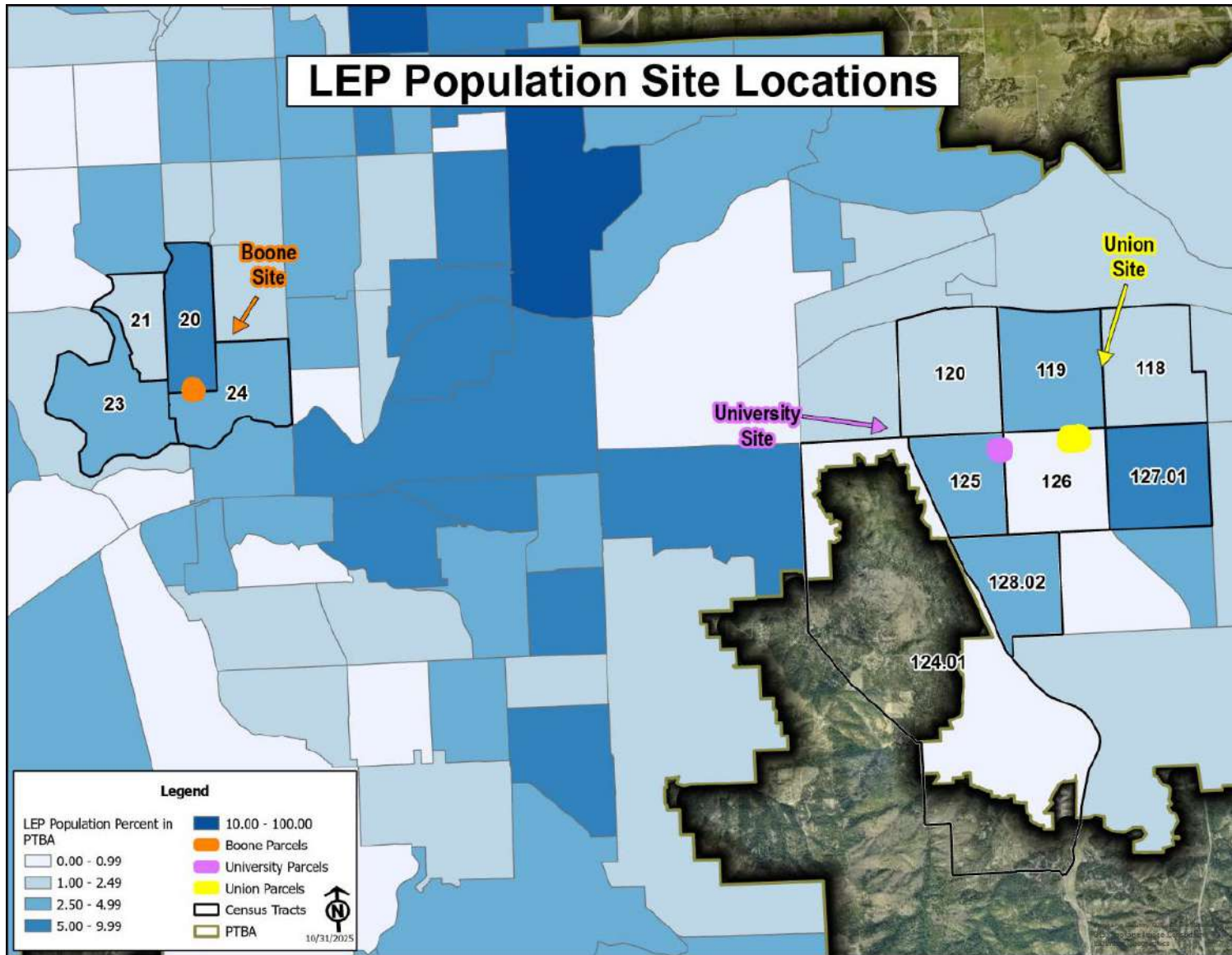
Map 2: Minority Population Site Locations



Map 3: Low-income Population Site Locations



Map 4: LEP Population Site Locations



Impact Analysis

The scale of the impacts of infrastructure which may include support storage, maintenance, and operations will depend heavily on where the facilities are sited. The impact analysis will identify the potential impacts based on the proposed needs, then consider the cumulative impacts of similar uses in the area. The sites will need to meet STA's current deficit of indoor and outdoor storage space for existing fixed route vehicles as well as maintenance and operations activities. Each site will evaluate noise, air, visual and traffic impacts.

- **Traffic Impacts** – The traffic impacts are based on the existing traffic conditions, traffic generated from bus movements, and traffic from employees accessing the site. STA participates in the Spokane County Commute trip reduction program, which allows STA to provide bus passes to employees to reduce single occupant vehicle trips due to commute trips. Rideshare is a free program for STA employees.
- **Air Impacts** – The air impacts are based on existing diesel and gasoline operated vehicles, specifically from fixed route operations and staff vehicles accessing the site.
- **Noise Impacts** – The noise impacts are based on vehicles entering and exiting the site, while maintenance activities will be conducted indoors and will not be audible outside of the facility.
- **Visual Impacts** – The visual impacts are based on the aesthetics of the site selected. The most prominent visual impact will be the parking area, and landscaping for storm water and aesthetic purposes. There will be a visual impact of buses and vehicles entering and existing the site. The facility will be designed to mitigate and enhance visual impacts by meeting landscaping requirements to mitigate impacts of various types of development.

Table 5: Impact Analysis

	Boone Site	Union Site	University Site
Traffic	There would be no increase in traffic in the surrounding area of the proposed site. The Boone site is already accommodating the traffic associated with bus movements and traffic generated by employees entering and exiting the site. The site is served by a minor arterial route (Boone Ave.).	There would not be an increase in traffic conditions that would occur due to the historic use of the land for manufacturing and storage. The site is located east of STA existing transit facility. The site is served by three principal arterial routes (Sprague Ave., Bowdish Rd., and Pines Rd.) and a major collector route (4th Ave).	The traffic impact would be determined by the use of the property. The site is located east of STA existing transit station. The site is served by a principal arterial route (Appleway Blvd.), a minor arterial route (University Rd.), and a major collector route (4th Ave.)
Air	The Boone Site would not experience an increase in air impacts due to existing vehicles entering and exiting the site. Vehicles are already stored at the site. There are very few residential units near the site that would be impacted.	The Union Site would not experience an increase in air impacts in addition to the existing sources of air pollution. The land surrounding the site includes a warehouse buildings and mixed-use building. The site is adjacent to the Appleway Trail and few residential units.	The impacts to air would be determined by the use of the property. The land surrounding the site includes retail/grocery buildings. The site is adjacent to Dishman Hills High School and has few residential units.
Noise	The Boone Site would not experience a higher level of noise impact that is already generating the noise levels produced from the Boone garage facility. There are very few residential units near the site that would be impacted.	The Union Site would not experience higher levels of noise due to the sites' historic use as a manufacturing and storage facility.	The University Site would not experience a higher level of noise impact that is already generating the noise levels produced from the Valley Transit Center. There are very few residential units near the site that would be impacted.
Visual	The visual impacts will improve the aesthetics of the residential area. The dilapidated apartment building experiences challenges with maintenance and cleanliness and repurposing to expand STA activities would improve the aesthetics of the site and surrounding neighborhood.	If the site is further developed, the Union Site would result in a visual improvement of the site as it currently houses warehouse buildings and a large, paved area. The development of the site would increase the visual aspects of the site by utilizing the site for existing STA activities in the area and include frontage improvements and landscaping.	The University Site would not result in a visual improvement of the site as at this time until its use is identified, it will remain vacant land, adjacent to the Valley Transit Center.

Analysis Conclusion

The selection of these sites for storage, maintenance, and operations will have no cumulative adverse impacts to the surrounding neighborhood.

Boone Site

The Boone site population demographics for the area show higher proportions of minority, low income and limited English populations, however, the majority of the population is located far from the parcel. Based on the topography of the Boone site, there is a 40-foot bluff that acts as a natural buffer from impacts to the limited amount of residents to the immediate north of the site. The surrounding land uses include the Spokane County courthouse and other industrial or institutional uses which supports the use of the Boone site as more compatible for STA use as compared to the existing residential use. In addition, the existing buildings are considered substandard housing. By relocating existing tenants, Spokane Transit is improving the living conditions by relocating tenants into more suitable housing. Relocation assistance will be provided in accordance with federal and state relocation requirements.

Spokane Transit has completed public outreach. The Boone site has been included in the STA Facilities Master Plan (FMP) as a potential site for future acquisition. The phase 1 FMP was adopted in June 2025 and included identification of the Boone site (Attachment C). The adoption process included a series of meetings at STA's committee meetings for the Community Advisory Committee, Planning & Development Committee and Board of Director's meetings spanning as early as April of 2024. These meetings are open to the public and notice is provided to the public of these meetings in accordance with Washington State's open and public meetings act. STA completes due diligence with the City of Spokane including coordination with historic preservationists. All property acquisitions are approved by the Board of Directors in public meetings (Attachment B) in accordance with RCW 42.30.110(1)(b); "considering the selection of a site or the acquisition of real estate by lease or purchase when public knowledge regarding such consideration would cause a likelihood of increased price."

Union Site

There is no disproportionate burden or disparate impact on this site, and no mitigation is necessary.

University Site

The University site population demographics for the area show higher proportions of minority and low-income populations as compared to the PTBA. STA is not developing this property, causing no disproportionate burden or disparate impact on this site, and no mitigation is necessary.

Spokane Transit has completed public outreach. The Boone site has been included in the STA Facilities Master Plan (FMP) as a potential site for future acquisition. The phase 1 FMP was adopted in June 2025 and included identification of the University site (Attachment C). The adoption process included a series of meetings at STA's committee meetings for the Community Advisory Committee, Planning & Development Committee and Board of Director's meetings spanning as early as April of 2024. These meetings are open to the public and notice is provided to the public of these meetings in accordance with Washington State's open and public meetings act. STA completes due diligence with the City of Spokane including coordination with historic preservationists. All property acquisitions are approved by the Board of Directors in public meetings (Attachment B) in accordance with RCW 42.30.110(1)(b); "considering the selection of a site or the acquisition of real estate by lease or purchase when public knowledge regarding such consideration would cause a likelihood of increased price."

Site Selection Conclusion

The selection of the sites for essential infrastructure to support storage, maintenance, and operations was chosen based on the opportunity to purchase property adjacent to existing STA properties to accommodate existing operations and potential future growth. The ideal proximity of the sites to the existing Boone facility, Fleck maintenance facility, and Valley Transit Center are considered optimal to accommodate existing and future growth which benefits transit operations. The selection of the sites allows STA to continue to provide affordable public transportation by reducing capital costs and operating in a manner that is a responsible use of public dollars. The development of these properties will be designed in a manner that will consider and reduce possible impacts. The sites are located in light industrial and corridor mixed use zones that are appropriate for the site's use as potential storage, maintenance, or operations facility.

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AGENDA

ADMINISTRATIVE HEARING OF THE BUILDING OFFICIAL
TUESDAY, APRIL 23rd, 2024 - 1:30 P.M.
COUNCIL BRIEFING CENTER
LOWER LEVEL - CITY HALL

1ST HEARING ITEMS

1. 1310 W Boone Ave - Substandard apartment building (LTR Real Estate Investments LLC)
2. 731 E 35th Ave - Substandard accessory structure (Berger)
- 3.

CONTINUED HEARING ITEMS

P1.

P2.

P3.

Scheduled Hearing Items and Progress Reports on this agenda are subject to change. Please contact Code Enforcement by noon on the day of the hearing date if you wish to confirm an agenda item.

AMERICANS WITH DISABILITIES ACT (ADA) INFORMATION: The City of Spokane is committed to providing equal access to its facilities, programs and services for persons with disabilities. The Council Briefing Center in the lower level of Spokane City Hall, 808 W. Spokane Falls Blvd., is wheelchair accessible and also is equipped with an infrared assistive listening system for persons with hearing loss. Headsets may be checked out (upon presentation of picture I.D.) through the meeting organizer. Individuals requesting reasonable accommodations or further information may call, write, or email Risk Management at 509.625.6221, 808 W. Spokane Falls Blvd, Spokane, WA, 99201; or mlowmaster@spokanecity.org. Persons who are deaf or hard of hearing may contact Risk Management through the Washington Relay Service at 7 1 1. Please contact us forty-eight (48) hours before the meeting date.

AGENDA

ADMINISTRATIVE HEARING OF THE BUILDING OFFICIAL
TUESDAY, OCTOBER 29, 2024 - 1:30 P.M.
COUNCIL BRIEFING CENTER
LOWER LEVEL - CITY HALL

1ST HEARING ITEMS

1. 1522 W Maxwell Avenue - Substandard, Abandoned, Unfit, and Nuisance House - Show Cause Hearing (SILVA, JOSE A)
2. 1302 W Boone Avenue - Substandard and Nuisance Apartment building - 1st Hearing (JORDIN, ARLIN)
3. 1827 W 9th Avenue - Substandard and Nuisance Apartment building - 1st Hearing (JORDIN, ARLIN)

CONTINUED HEARING ITEMS

P1.

P2.

P3.

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AGENDA

ADMINISTRATIVE HEARING OF THE BUILDING OFFICIAL
TUESDAY, MAY 13, 2025 - 1:30 P.M.
COUNCIL BRIEFING CENTER
LOWER LEVEL - CITY HALL

1ST HEARING ITEMS

1. 1302 W BOONE AVENUE - Substandard, Unfit, and Nuisance Apartment Building - Show Cause Hearing (ARLIN JORDIN)
- 2.
- 3.
- 4.

CONTINUED HEARING ITEMS

P1.

P2.

P3.

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RESOLUTION NO. 827-24

A RESOLUTION AUTHORIZING THE ACQUISITION OF REAL PROPERTY AS DESCRIBED HEREIN AND OTHER MATTERS PROPERLY RELATING THERE.

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, pursuant to RCW Title 36, Chapter 57A, Public Transportation Benefit Area;

WHEREAS, STA is authorized under RCW 36.57A.080 and its Bylaws to acquire property to improve the use of its transportation facilities;

WHEREAS, STA desires to purchase and acquire certain real property, as set forth herein, from Spokane County for the purpose of improving its public transportation system;

WHEREAS, Spokane County is the owner of approximately 0.98 (42,815 square feet) of real property, Spokane County Parcel Numbers 45201.0831 and 45201.0832 ("the Property"), located at 202 S. University Road, in the City of Spokane Valley, County of Spokane, State of Washington, which Spokane County has designated as surplus property;

WHEREAS, the Property is adjacent to STA's existing Pence-Cole Valley Transit Center and is intended to be used for transit purposes by STA;

WHEREAS, STA has completed a Phase I and a limited Phase II Environmental site assessment, and a third-party appraisal and appraisal review to determine the fair market value of the Property, consistent with STA's policies and procedures;

WHEREAS, on October 29, 2024, Spokane County's Board of County Commissioners accepted an offer of \$492,000 from STA for the purchase of the Property, which shall be funded using STA local funds;

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

Section 1. The STA Board of Directors hereby authorizes the acquisition of certain real property described as:

Approximately 0.98 (42,815 square feet) assigned Spokane County Assessor's parcel numbers 45201.0831 and 45201.0832, situated at 202 S. University Road, in Spokane Valley, Washington,

for a purchase price of \$492,000.

Section 2. The Chief Executive Officer is authorized to take such actions and execute all documents necessary to acquire the real property described herein.

Section 3. Any actions of the Chief Executive Officer, Board of Directors, or staff of STA prior to the date hereof and consistent with the terms of this Resolution are ratified and confirmed.

Section 4. This resolution shall take effect and be in force immediately upon passage.

ADOPTED by STA at a regular meeting thereof held on the 21st day of November 2024.

Attest:



Dana Infalt
Clerk of the Authority



Al French
STA Board Chair

Approved as to form:



Megan Clark
Legal Counsel

RESOLUTION NO. 834-25

A RESOLUTION AUTHORIZING THE ACQUISITION OF REAL PROPERTY AS DESCRIBED HEREIN 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, pursuant to RCW Title 36, Chapter 57A, Public Transportation Benefit Area;

WHEREAS, STA is authorized under RCW 36.57A.080 and its Bylaws to acquire property to improve the use of its transportation facilities;

WHEREAS, STA desires to purchase and acquire certain real property, as set forth herein, from Washington Industrial Properties–Spokane L.L.C. for the purpose of improving its public transportation system;

WHEREAS, Washington Industrial Properties–Spokane L.L.C. is the owner of approximately 4.69 (204,296 square feet) of real property, Spokane County Parcel Numbers 45211.0601, 45211.0518, 45211.0511, and 45211.0510 (“the Property”), located at 118 S. Union Road, in the City of Spokane Valley, County of Spokane, State of Washington;

WHEREAS, the Property is adjacent to STA’s existing Charles Fleck Spokane Valley Service Center and is intended to be used for undefined future transit purposes by STA;

WHEREAS, STA completed a Phase I Environmental site assessment, and has undertaken a Phase II Environmental site assessment;

WHEREAS, a third-party appraisal and appraisal review has been completed to determine the fair market value of the Property, consistent with STA’s policies and procedures;

WHEREAS, on January 17, 2025, Washington Industrial Properties–Spokane L.L.C. accepted an offer of \$2,910,000 from STA for the purchase of the Property, which represents the fair market value of the Property, and which shall be funded using STA local funds;

WHEREAS, a Purchase and Sale Agreement will be entered into containing the specific terms and conditions for the acquisition of the Property, which is attached hereto and incorporated herein as Exhibit A, or in substantially the same form as Exhibit A.

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

Section 1. The STA Board of Directors hereby authorizes the acquisition of certain real property described as:

Approximately 4.69 acres (204,296 square feet) assigned Spokane County Assessor's Parcel numbers 45211.0601, 45211.0518, 45211.0511, and 45211.0510, located at 118 S. Union Road, in the City of Spokane Valley, County of Spokane, State of Washington,

for a total purchase price of \$2,910,000, subject to the terms and conditions of the Purchase and Sale Agreement as set forth in Exhibit A, or in substantially the same form as Exhibit A.

Section 2. The Co-Interim Chief Executive Officers are authorized to take such actions and execute the Purchase and Sale Agreement, and all other documents necessary to acquire the real property described herein.

Section 3. Any actions of the Co-Interim Chief Executive Officers, Board of Directors, or staff of STA prior to the date hereof and consistent with the terms of this Resolution are ratified and confirmed.

Section 4. This resolution shall take effect and be in force immediately upon passage.

ADOPTED by STA at a regular meeting thereof held on the 20th day of February 2025.

Attest:



Dana Infalt
Clerk of the Authority



Pam Haley
STA Board Chair

Approved as to form:



Megan Clark
Legal Counsel

RESOLUTION NO. 840-25

A RESOLUTION AUTHORIZING THE ACQUISITION OF REAL PROPERTY AS DESCRIBED HEREIN 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, pursuant to RCW Title 36, Chapter 57A, Public Transportation Benefit Area;

WHEREAS, STA is authorized under RCW 36.57A.080 and its Bylaws to acquire property to improve the use of its transportation facilities;

WHEREAS, STA desires to purchase and acquire certain real property, as set forth herein, from Arlin Jordin for the purpose of improving its public transportation system;

WHEREAS, Arlin R. Jordin is the owner of approximately .39 acres (16,988 square feet) of real property, Spokane County Parcel Numbers 35182.2907 and 35182.2909 ("the Property"), located at 1302 and 1308 W Boone Avenue, in the City of Spokane, County of Spokane, State of Washington;

WHEREAS, the Property is adjacent to STA's main operations and administrative buildings and is intended to be used for undefined future transit purposes by STA;

WHEREAS, a third-party appraisal and appraisal review has been completed to determine the fair market value of the Property, consistent with STA's policies and procedures;

WHEREAS, on March 18, 2025, Shawna Jordin, on behalf of Arlin Jordin accepted an offer of \$1,460,000 from STA for the purchase of the Property, which represents the fair market value of the Property, and which shall be funded using STA local funds;

WHEREAS, a Purchase and Sale Agreement will be entered into containing the specific terms and conditions for the acquisition of the Property, which is attached hereto and incorporated herein as Exhibit A, or in substantially the same form as Exhibit A.

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

Section 1. The STA Board of Directors hereby authorizes the acquisition of certain real property described as:

Resolution No. 840-25 - 2025

Approximately .39 acres (16,988 square feet) assigned Spokane County Assessor's Parcel numbers 35182.2907 and 35182.2909 located at 1302 and 1308 W. Boone Avenue, in the City of Spokane, County of Spokane, State of Washington,

For a total purchase price of \$1,460,000 subject to the terms and conditions of the Purchase and Sale Agreement as set forth in Exhibit A, or in substantially the same form as Exhibit A.

Section 2. The Interim Co-Chief Executive Officers are authorized to take such actions and execute the Purchase and Sale Agreement, and all other documents necessary to acquire the real property described herein.

Section 3. Any actions of the Interim Co-Chief Executive Officers, Board of Directors, or staff of STA prior to the date hereof and consistent with the terms of this Resolution are ratified and confirmed.


Section 4. This resolution shall take effect and be in force immediately upon passage.

ADOPTED by STA at a regular meeting thereof held on the 26th day of June, 2025.

Attest:




Dana Infalt
Clerk of the Authority



Lance Speirs
Chair Pro Tempore

Approved as to form:



Megan Clark
Legal Counsel

RESOLUTION NO. 848-25

A RESOLUTION AUTHORIZING THE ACQUISITION OF REAL PROPERTY AS DESCRIBED HEREIN 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, pursuant to RCW Title 36, Chapter 57A, Public Transportation Benefit Area;

WHEREAS, STA is authorized under RCW 36.57A.080 and its Bylaws to acquire property to improve the use of its transportation facilities;

WHEREAS, STA desires to purchase and acquire certain real property, as set forth herein, from LTR Real Estate Investments, LLC for the purpose of improving its public transportation system;

WHEREAS, LTR Real Estate Investments, LLC is the owner of approximately .22 acres (9,583 square feet) of real property, Spokane County Parcel Number 35182.2906 ("the Property"), located at 1310 W. Boone Avenue in the City of Spokane, County of Spokane, State of Washington;

WHEREAS, the Property is adjacent to STA's main operations and administrative buildings and is intended to be used for undefined future transit purposes by STA;

WHEREAS, a third-party appraisal and appraisal review has been completed to determine the fair market value of the Property, consistent with STA's policies and procedures;

WHEREAS, on September 24, 2025, LTR Real Estate Investments LLC accepted an offer of \$1,420,000 from STA for the purchase of the Property, which represents the fair market value of the Property, and which shall be funded using STA local funds;

WHEREAS, a Purchase and Sale Agreement will be entered into containing the specific terms and conditions for the acquisition of the Property, which is attached hereto and incorporated herein as Exhibit A, or in substantially the same form as Exhibit A.

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

Section 1. The STA Board of Directors hereby authorizes the acquisition of certain real property described as:

Approximately .22 acres (9,583 square feet) assigned Spokane County Assessor's Parcel number 35182.2906, located at 1310 W. Boone Avenue in the City of Spokane, County of Spokane, State of Washington

for a total purchase price of \$1,420,000 subject to the terms and conditions of the Purchase and Sale Agreement as set forth in Exhibit A, or in substantially the same form, as Exhibit A.

Section 2. The Chief Executive Officer is authorized to take such actions and execute the Purchase and Sale Agreement, and all other documents necessary to acquire the real property described herein.

Section 3. Any actions of the Chief Executive Officer, Board of Directors, or staff of STA prior to the date hereof and consistent with the terms of this Resolution are ratified and confirmed.

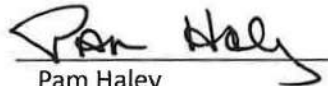
Section 4. This Resolution shall take effect and be in force immediately upon passage.

ADOPTED by STA at a regular meeting thereof held on the 16th day of October 2025.

Attest:



Dana Infalt
Clerk of the Authority



Pam Haley
STA Board Chair

Approved as to form:



Megan Clark
Legal Counsel

DRAFT

Spokane Transit Authority
1230 West Boone Avenue
Spokane, WA 99201-2686
(509) 325-6000

NOTICE OF BOARD MEETING

NOTICE IS HEREBY GIVEN by the Board of Directors of the Spokane Transit Authority of Spokane County, Washington, that the Board will hold a meeting at 1:30 p.m. on Thursday, June 26, 2025, *(1 week later than usual)* in the Spokane Transit Boardroom, 1230 West Boone Avenue, Spokane Washington. A virtual video conference option is available, and the joining information is listed on the Agenda.

NOTICE IS FURTHER GIVEN that business to be discussed and/or action taken shall be in accordance with the attached agenda, which is also on file at the STA Administrative Offices.

THE MEETING SHALL BE OPEN TO THE PUBLIC.

BY ORDER OF THE STA BOARD OF DIRECTORS.

DATED THIS 26th DAY OF JUNE 2025.



Dana Infalt
Clerk of the Authority
Sr. Executive Assistant to the CEO
Manager Board & Executive Support

Optional virtual joining link available on agenda

BOARD MEETING

Thursday, June 26, 2025 *(1 week late)*
1:30 – 3:00 p.m.

STA Boardroom
1230 West Boone Avenue, Spokane, WA
w/Virtual Public Viewing Option Link on Page 2

AGENDA

1. Call to Order and Roll Call *(Chair Haley)*
2. Pledge of Allegiance
3. Excused Absences
4. Approve Board Agenda *(Chair Haley)*
5. Public Expressions
6. Recognitions and Presentations: *none*
7. Public Hearing: *20 minutes*
 - A. 2026-2031 Transit Development Plan: Complete Draft *(Karl Otterstrom)*
 - B. Division Street Bus Rapid Transit: Locally Preferred Alternative Amendment *(Karl Otterstrom)*
8. Board Action - Consent Agenda: *5 minutes*
 - A. Minutes of May 15, 2025, STA Board Meeting– Corrections/Approval
 - B. Approval of the May 2025 Vouchers *(Tammy Johnston)*
 - C. Public Works Contracts under \$35,000: Final Acceptance *(Jordan Hayes-Horton)*
 - D. Division Street Bus Rapid Transit: Parametrix, Inc. Work Order #6 Approval *(Karl Otterstrom)*
 - E. Customer Care Auditing Service: Award of Contract *(Carly Cortright)*
 - F. Data Feed/Customer Information Improvements: Award of Contract *(Carly Cortright)*
 - G. Training Facility Grant Submittal Approval *(Karl Otterstrom)*
 - H. Cheney Transit Improvements Interlocal Agreement *(Karl Otterstrom)*
9. Board Action – Other: *10 minutes*
 - A. Facilities Master Plan Phase 1 Report Acceptance (Resolution) *(Brandon Rapez-Betty)*
10. Board Operations Committee: *5 minutes*
 - A. Chair Report *(Chair Haley)*
11. Planning & Development Committee: *5 minutes*
 - A. Chair Report *(Tim Hattenburg)*
12. Performance Monitoring & External Relations Committee: *15 minutes*
 - A. Chair Report *(Lance Speirs)*
 - i. 2025 1st Quarter Year-to-Date Performance Measures *(Brandon Rapez-Betty)*
 - ii. Enhanced Transit Security Strategy Update *(Brandon Rapez-Betty)*
13. CEO Report: *15 minutes*

14. Board Information – *no action or discussion*
 - A. Committee Minutes
 - B. May 2025 Sales Tax Revenue (*Tammy Johnston*)
 - C. April 2025 Financial Results Summary (*Tammy Johnston*)
 - D. April 2025 Operating Indicators (*Brandon Rapez-Betty*)
 - E. Disadvantaged Business Enterprise Program Proposed Goal for Federal Fiscal Years 2026, 2027, & 2028 (*Karl Otterstrom*)
15. Executive Session: *20 minutes*
 - A. *RCW 42.30.110(1)(b) To consider the selection of a site or the acquisition of real estate by lease or purchase when public knowledge regarding such consideration would cause a likelihood of increased price.*
 - B. *To evaluate the qualifications of an applicant for public employment and to review the performance of a public employee. (RCW 42.30.110(g))*
16. New Business
17. Board Member Expressions
18. Adjourn (*Chair*)

Optional Virtual link:	Click Here to Join	
Password:	Board Members: 2025	Guests: <i>Guest</i>
Call-in Number:	1-408-418-9388	Event #: 2489 582 8592

Cable 5 Broadcast Dates and Times of June 26, 2025, Board Meeting:

Saturday, June 28, 2025	4:00 p.m.
Monday, June 30, 2025	10:00 a.m.
Tuesday, July 1, 2025	8:00 p.m.

July Committee Meetings, Wednesday: (*July Committee Meetings - all one week late*)

Planning & Development	July 9, 2025, 10:00 a.m.
Performance Monitoring & External Relations	July 9, 2025, 10:00 a.m.
Board Operations	July 16, 2025, 1:30 p.m.

July Board Meeting: (*one week late*)

Thursday, July 24, 2025, 1:30 p.m. STA Boardroom, 1230 West Boone Avenue, Spokane, Washington
(A virtual joining option will be available for all Committee and Board meetings)

Agendas of regular Committee and Board meetings are posted the Friday afternoon preceding each meeting on STA's website: www.spokanetransit.com. A video of the Board meeting may be viewed on the website the week after the meeting. Discussions concerning matters to be brought to the Board are held in Committee meetings. The public is welcome to attend and participate. Anyone wishing to address the Board of Directors on a specific subject at a Board meeting may do so by submitting written comments to the STA Chair of the Board (1230 West Boone Avenue, Spokane, WA 99201-2686) 24 hours prior to the Board meeting. Mail addressed to the Board of Directors will be distributed by STA at its next meeting. Mail addressed to a named Board Member will be forwarded to the Board Member, unopened. Spokane Transit assures nondiscrimination in accordance with Title VI of the Civil Rights Act of 1964. For more information, see www.spokanetransit.com. Upon request, alternative formats of this information will be produced for people who are disabled. The meeting facility is accessible for people using wheelchairs. For other accommodations, please call 325-6094 (TTY Relay 711) at least forty-eight (48) hours in advance.

SPOKANE TRANSIT AUTHORITY

BOARD MEETING OF

June 26, 2025

AGENDA ITEM 9A : FACILITIES MASTER PLAN PHASE 1 REPORT: ACCEPTANCE (RESOLUTION)

REFERRAL COMMITTEE: Planning & Development Committee (*Hattenburg*)

SUBMITTED BY: Brandon Rapez-Betty, Interim Co-CEO / Chief Operations Officer
Jessica Kelch, Senior Project Manager

SUMMARY: At the June 4, 2025, Planning & Development Committee meeting, staff provided a Phase I update of the Facilities Master Plan, which was last reported on to the Planning & Development Committee on April 2, 2025, and the Board of Directors on April 17, 2025. As noted at that time the final report summarizing the work completed to date was nearing completion. All Board members were provided a copy of the final report on May 28, 2025. Today, staff are seeking approval of the Committee's recommendation.

The purpose of this agenda item is to seek Board acceptance of the Phase I report of the Facilities Master Plan, authorize staff to begin work in key near-term needs, and approve the initiation of Phase II activities.

BACKGROUND: STA's Facilities Master Plan (FMP) is a key document for planning and programming the long-term support infrastructure for the region's public transportation system. The update to the FMP is a planning process to determine a location or locations for new/expanded facilities, near-term needs, and growth over time.

The project team has completed the Phase I report summarizing inventory and programming data, due-diligence efforts for existing and potential new properties, and has analyzed near-term and long-term needs based on various growth and operations scenarios. The process, informed by the STA Board-approved Zero Emissions Fleet Transition Plan and *Connect 2035*, has identified strategic timing, phasing plans and began development of rough order of magnitude cost expectations for near-term projects.

The results of the Phase I effort identified near-term actions to be taken between 2026 and 2029 for the smaller to moderately sized projects that advance the FMP and are in line with STA's strategic plan, *Connect 2035*. As discussed in previous meetings those near-term actions include:

- Property acquisition of opportunity sites to support future facilities and requirements
- Centralized public and executive meeting spaces to improve community engagement and accessibility
- A new, modern, training facility to improve STA's capacity and effectiveness in developing a well-trained workforce
- A facilities & grounds warehouse to house current and future equipment and supplies

Subject to Board approval, long-term actions will be further developed in Phase II, completing this iteration of the Facilities Master Plan with a vision through 2050. This includes advancing the siting, design and construction of a clean energy base, with a targeted opening date of 2031.

Updates to the Capital Improvement Program are incorporated in the 2026-2031 Transit Development Plan (TDP) and were first presented to the Board in May, with anticipation of Board adoption of the TDP in July.

RESOLUTION NO. 838-25

A RESOLUTION ADOPTING PHASE I OF THE FACILITIES MASTER PLAN AND DIRECTING STAFF TO PROCEED WITH PHASE II ACTIVITIES INCLUDING PROPERTY ACQUISITION, SCOPING, AND PRELIMINARY ENGINEERING, 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 Chapter 36.57A RCW, Public Transportation Benefit Areas (PTBAs); and

WHEREAS, pursuant to Chapter 36.57A RCW, STA has all powers necessary to carry out the purposes of the public transportation benefit area; and

WHEREAS, the STA Board of Directors, pursuant to state law and the STA Bylaws, Article III Section 3.1, is authorized to provide the policy and legislative direction for STA;

WHEREAS, STA is engaged in long-term strategic planning to guide the agency’s growth and incorporation of evolving propulsion technologies in alignment with regional and statewide environmental objectives;

WHEREAS, the state of Washington, pursuant to Ch. 70A.535 RCW, directs public agencies to transition to a zero-emission fleet, with interim targets including 100% of new transit bus purchases being zero-emission by 2035, and full transition of fleet to zero-emission by 2040 for large agencies where feasible;

WHEREAS, STA adopted a Zero-Emission Fleet Transition Plan in March 2020 and reaffirmed its commitment by approving an updated transition plan in 2024, which sets a target date of 2045 for full zero-emission fleet deployment, with a combination of battery-electric and/or hydrogen fuel cell propulsion systems;

WHEREAS, STA’s ability to meet its zero-emission fleet goals is dependent upon the development of new facilities, including a clean energy base, to accommodate fleet expansion and fueling infrastructure;

WHEREAS, STA has determined that the procurement of multiple properties is necessary to maintain flexibility as it refines its selection of a final location or locations for these critical infrastructure projects;

WHEREAS, the Facilities Master Plan Phase I Report provides an essential planning framework that includes near-term actions and scopes of work needed to address pressing agency

needs, including a modern training facility, centralized public and executive meeting spaces, and expanded warehouse capacity for the Facilities Maintenance Department;

WHEREAS, Phase I of the Facilities Master Plan reflects work completed to date including site due diligence, programming data, and initial cost projections and was informed by the Zero-Emission Transition Plan and Connect 2035 Strategic Plan; and

WHEREAS, the Facilities Master Plan Update project contemplates a second phase of planning activity (Phase II) in which one or more sites are selected for a clean energy base, and a timeline of improvements through 2050 is refined.

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

Section 1. The STA Board of Directors hereby adopts the Phase I report of the Facilities Master Plan as foundational guidance for infrastructure development to support STA’s current and future operational, maintenance and administrative requirements.

Section 2. The STA Board of Directors hereby authorizes staff to initiate real property acquisition necessary and consistent with these policies, due diligence, project scoping, and preliminary engineering activities necessary to advance the identified near-term projects, including a modern training facility, centralized public and executive meeting spaces, and expanded capacity for a facilities & grounds warehouse.

Section 3. The STA Board of Directors hereby approves the initiation of Phase II of the Facilities Master Plan to advance a future clean energy base and other long-term objectives of the plan.

Section 4. The Chief Executive Officer is hereby authorized and directed to take all action necessary to properly carry out the purpose of this resolution and to advance the objectives of the Facilities Master Plan in accordance with agency policy and applicable law. Any actions taken by the Chief Executive Officer, Board of Directors, or staff prior to the date hereof and consistent with the terms of this resolution are ratified and confirmed.

Section 5. This resolution shall take effect immediately upon adoption.

Adopted by STA at a regular meeting thereof held on the 26th day of June, 2025.

ATTEST:

SPOKANE TRANSIT AUTHORITY:

Dana Infalt
Clerk of the Authority

Pam Haley
Board Chair

Approved as to form:

Megan Clark
Legal Counsel

2.1 STA OWNED PROPERTIES

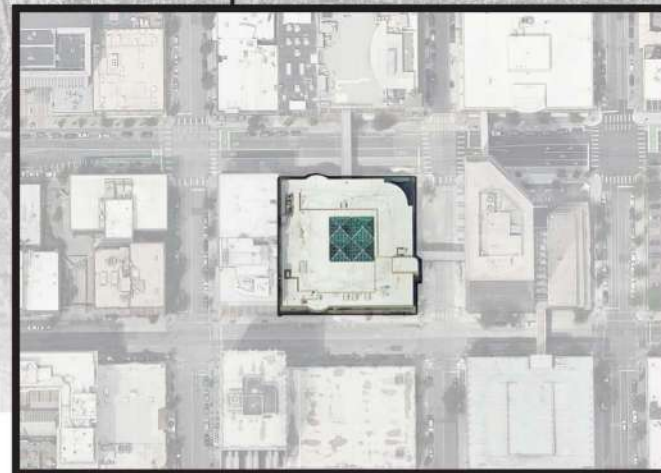
BOONE CAMPUS 15.12 acres



MISSION AND GREENE 5.95 acres



University Site
VALLEY SERVICE CENTER (FLECK) 3.29 acres



THE PLAZA



FAIRGROUNDS 11.26 acres

4.2 SINGLE BASE

There are many opportunities that make the single base operational model attractive to STA. Co-location of staff for quick, effective collaboration and consolidation of functions into one location being the main draw. This model does the best job of accommodating many of the departments' desire to be "all together" that came up during initial brainstorming sessions. However, the need for such a large, centrally located site to make this model a reality proves challenging.

Considering STA's desire to use existing assets to the greatest extent possible, the fact that the Boone Campus is so large and centrally located, and STA's investment and tenure there, the team studied using the Boone Campus as the site for a single base operational model. This scenario focused on how the Boone Campus could be transitioned, through renovation, expansion, and new construction, to a clean energy base housing all of STA's buses and most of their departmental functions.

SEVERAL ASSUMPTIONS WERE MADE IN THIS SCENARIO:

- > A new site minimum of 3 acres is acquired to house Paratransit
- > STA acquires 1300 block (between Adams and Cedar) north of Boone
- > STA acquires Spokane County property at 1300 block south of Boone
- > Vacation of Adams St. north of Boone
- > Vacation of Sharp Ave. west of Jefferson St.
- > Demolition of 1212 Sharp building
- > Demolition of North Boone (1230 Building)
- > Ability to stack program and build structured parking on North Boone site
- > STA acquires WSDOT property after completion of North Spokane Corridor and vacation of Thor Ct. at Mission and Greene site
- > Existing Fleck facility retrofitted/expanded for Facilities and Grounds
- > Fairgrounds site unused and available for land swap or sale

THE SEQUENCE OF EVENTS ENVISIONED FOR THIS SCENARIO ARE AS FOLLOWS:

NEAR TERM ACTIONS (2025-2030)

- > Construction of new Paratransit facility on a newly acquired site
- > Construction of new Training facility at Mission and Greene site
- > Renovate and build out Fleck site for Facilities and Grounds
- > Begin to vacate Boone by moving Administrative functions to renovated and/or leased space at the Plaza

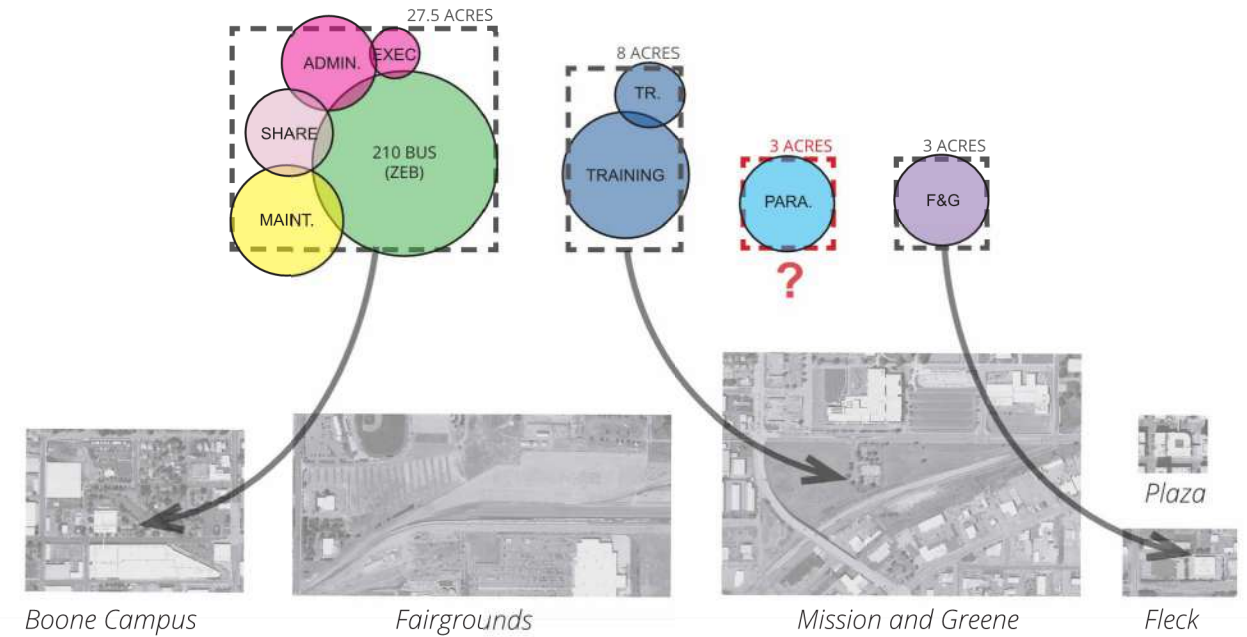
MID-TERM ACTIONS (2030-2035)

- > Construction of Clean Energy Base Phase I (~140 ZEB) at north Boone site
- > Move Administration and Executives to new building at north Boone site

LONG TERM ACTIONS (2035-2045)

- > Renovation of south Boone site to create Clean Energy Base Phase II (~70 ZEB)

While this scenario ultimately addresses STA's desire to consolidate departments and co-locate staff, it fails to adequately address STA's immediate needs around expanded ZEB storage and additional office space. Because vacation of the Boone campus is required before renovation and retrofitting into new facilities, the timeline for new office space and ZEB storage is out 10-15 years. Additionally, the density required on the Boone campus including stacking multiple floors of bus storage, maintenance and the need for structured parking pose construction, budget and zoning challenges on the north Boone site. This scenario also would rely upon the ability to acquire adjacent properties that is not currently owned by STA. While not completely unrealistic, these challenges have made other scenarios more desirable.



Boone Site



4.3 DUAL CAMPUS

The dual campus model looks at supplementing the Boone Campus with an additional new clean energy base. Two site options were studied for the location of a new clean energy base. The first being at Mission and Greene, assuming the acquisition of the WSDOT property after the completion of the North Spokane Corridor, and the second being a newly acquired site in the 10 to 30 acre range.

The benefits of creating a new clean energy base in the near term are twofold: it addresses STA's immediate needs by providing additional office space and ZEB storage while alleviating space on the Boone campus, allowing for renovation and expansion of the Boone campus into a second clean energy base much sooner.

SEVERAL ASSUMPTIONS WERE MADE IN THIS SCENARIO:

- > A new site minimum of 25 acres (or with the ability to expand to this size) is acquired to house a new approximately 140 ZEB clean energy base
- > STA acquires 1300 block (between Adams and Cedar) north of Boone
- > Vacation of Adams St. north of Boone
- > Vacation of Sharp Ave. west of Jefferson St.
- > Demolition of 1212 Sharp building
- > Demolition of North Boone (1230 Building) likely, but could be re-purposed
- > Ability to stack program (Administration/Shared space over Maintenance) on North Boone site
- > STA acquires WSDOT property after completion of North Spokane Corridor and vacation of Thor Ct. at Mission and Greene site
- > Existing Fleck facility retrofitted/expanded for Paratransit
- > Fairgrounds site unused and available for land swap or sale

THE SEQUENCE OF EVENTS ENVISIONED FOR THIS SCENARIO ARE AS FOLLOWS:

NEAR TERM ACTIONS (2025-2030)

- > Construction of new approximately 140 ZEB clean energy base on a newly acquired site
- > Renovate and build out Fleck site for Paratransit
- > Begin to vacate Boone by moving Administrative functions to renovated and/or leased space at the Plaza

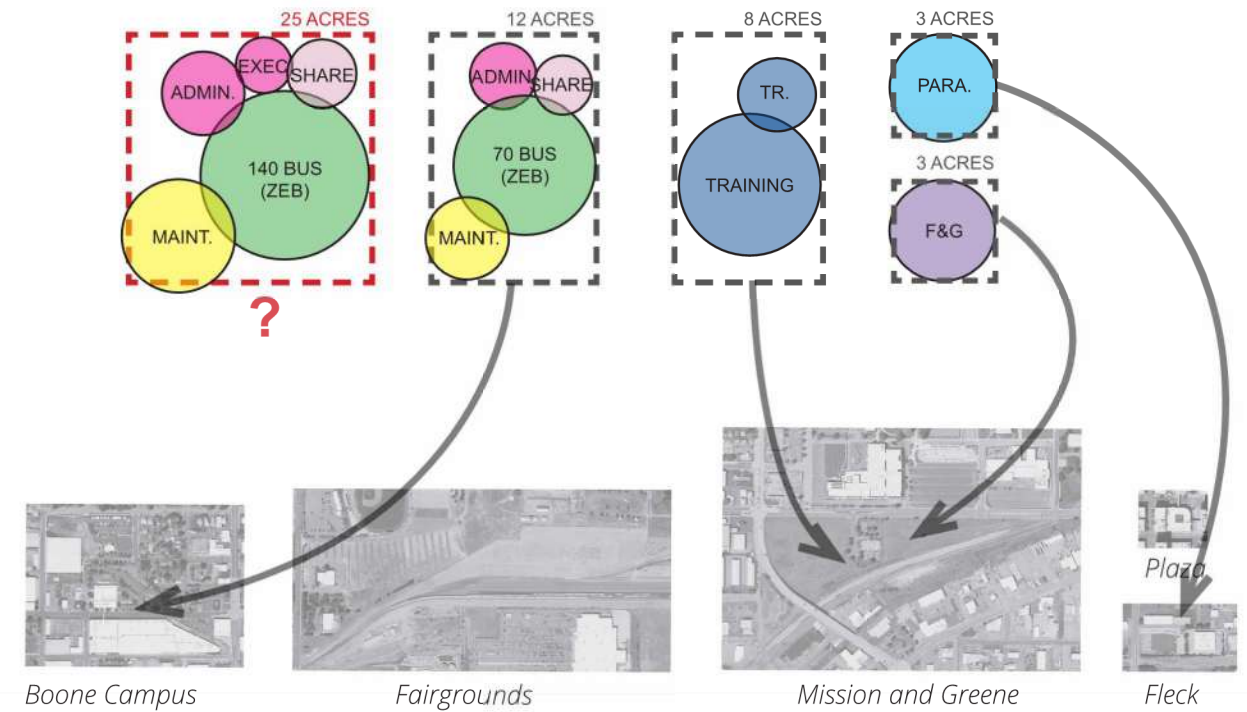
MID-TERM ACTIONS (2030-2035)

- > Construction of new Training facility and new Facilities and Grounds building at Mission and Greene site
- > Move Administration and Executives to new clean energy base

LONG TERM ACTIONS (2035-2045)

- > Renovation of South Boone site to create Clean Energy Base (~70 ZEB)

While this scenario addresses STA's immediate needs around expanded ZEB storage, and additional office space, it poses some challenges such as the size of new site required and timing of a new training facility. To construct a new 140 ZEB clean energy base, a large newly acquired site in the range of 25-30 acres is required. Additionally, by locating Training and Facilities and Grounds at the Mission and Greene site, it requires STA to acquire the adjacent WSDOT property, which means construction timing would be dependent on the completion of the North Spokane Corridor project. In this scenario, south Boone is shown as being unoccupied and available for re-development by entities other than STA. However, this idea received unfavorable feedback from STA and has since been revised to incorporate the use of south Boone by STA functions in future iterations shown later in this document. The other ideas contained within this dual campus scenario were viewed favorably and have been incorporated into the preferred approach.



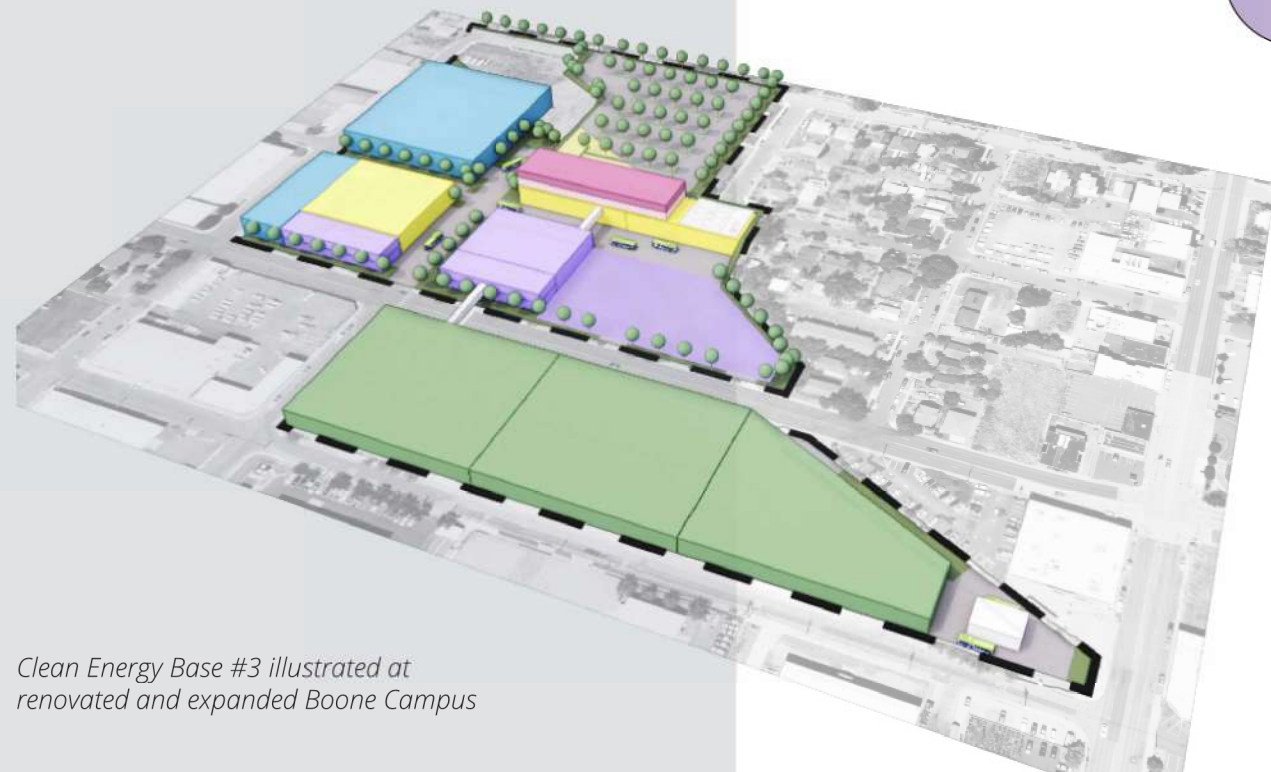
4.5 PREFERRED APPROACH

SCENARIO 3: 25-30 ACRE INITIAL SITE

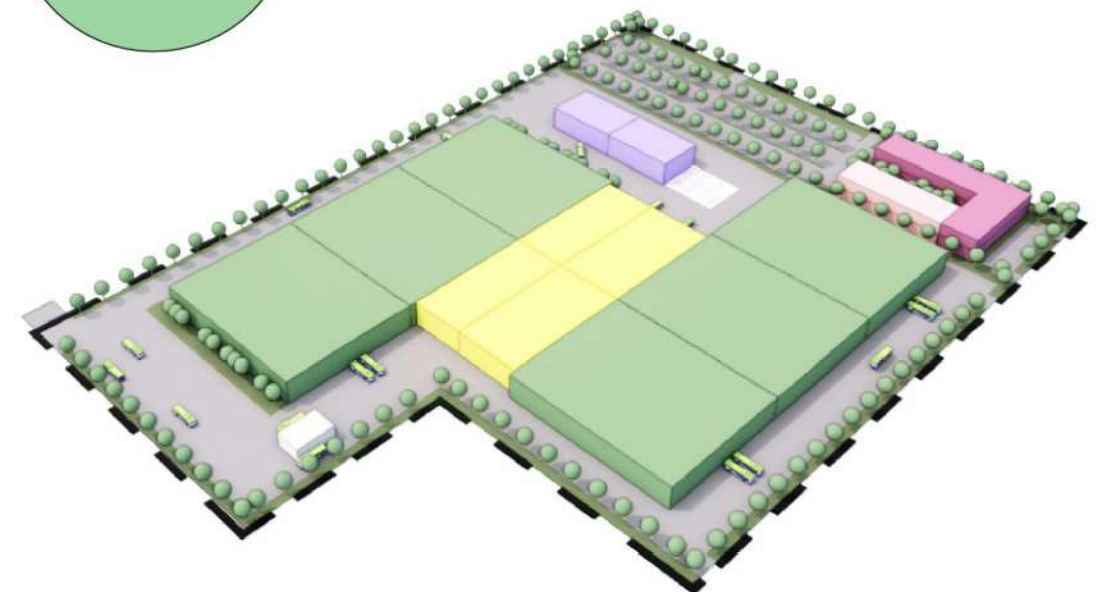
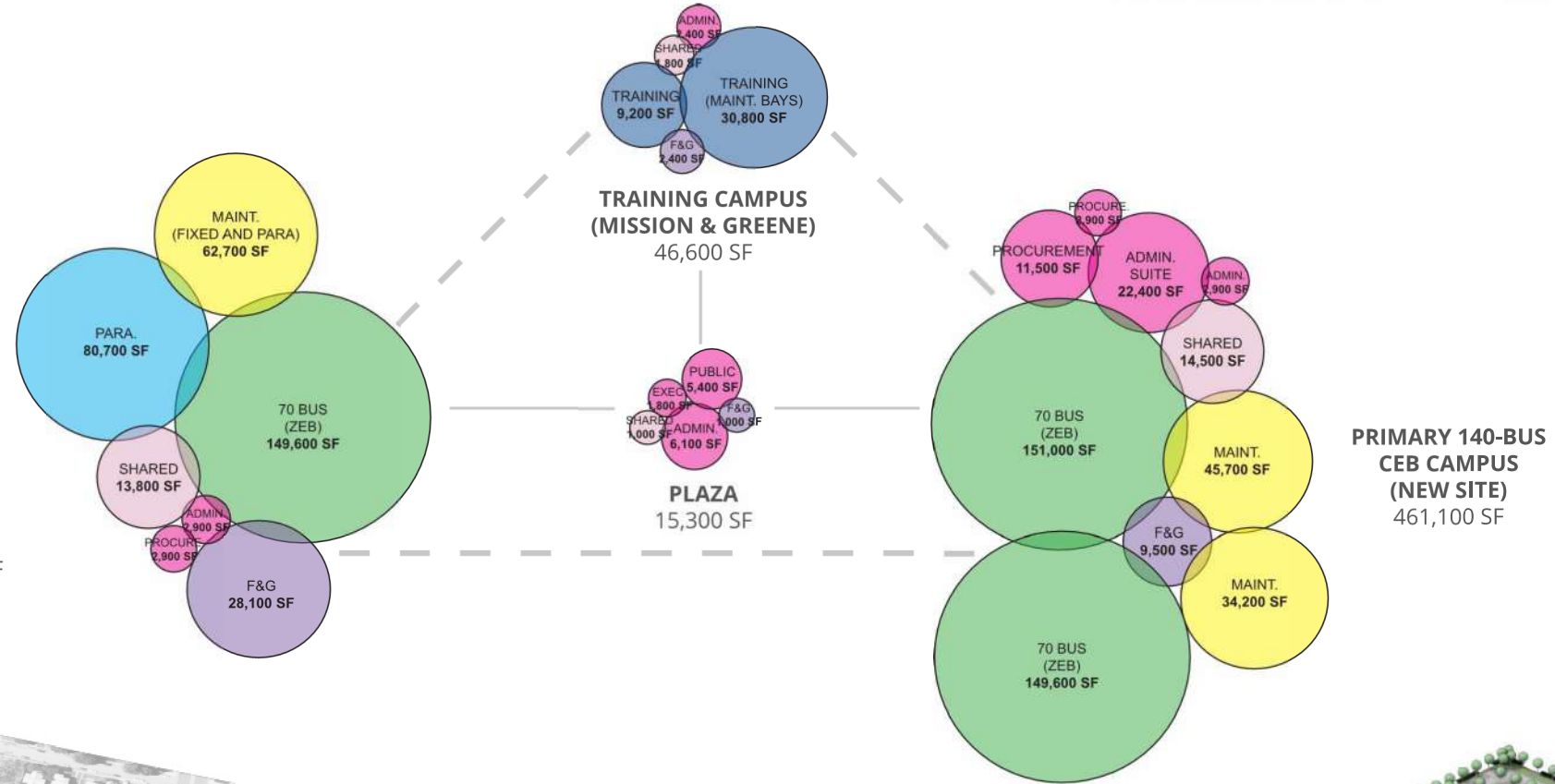
In this scenario, a dual campus of clean energy bases, one housing 2/3 of the bus storage and one housing 1/3, is created. In the initial phase (2030) a new 70 ZEB clean energy base is constructed much like in scenarios one and two, however the initial primary base is located on a site that is 25-30 acres or has the capability to reach this size in the future, to allow for a subsequent phase (2035) expansion creating a 140 total ZEB clean energy base. Because bus storage and charging is consolidated to two sites; one being on a large newly acquired site and one being the renovated Boone Campus, the Mission and Greene site is available for a new training facility and outdoor driver training course. Although large, the 25-30 acre site would be the only new site acquisition required in this scenario.



Training campus illustrated on Mission and Greene site



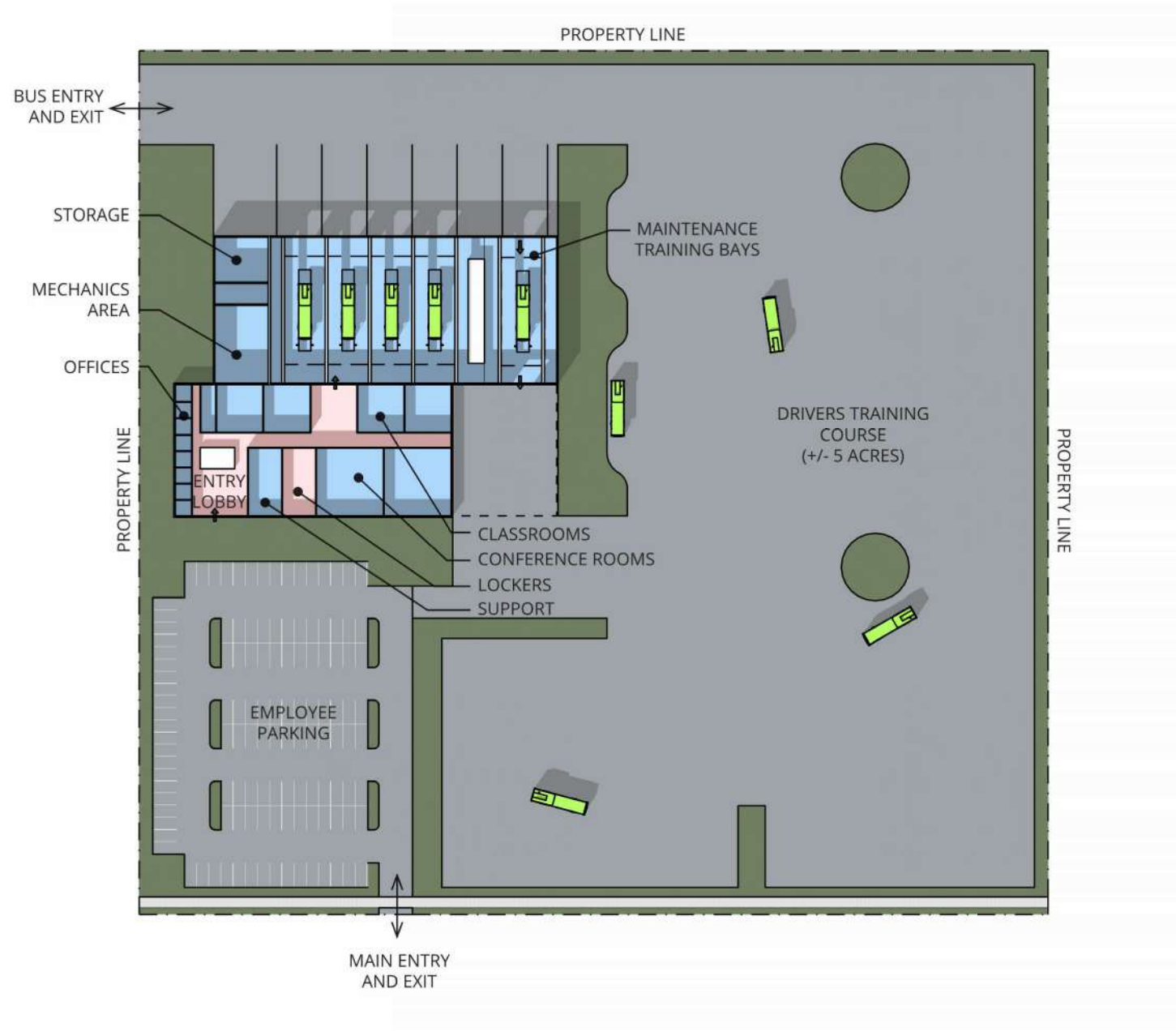
Clean Energy Base #3 illustrated at renovated and expanded Boone Campus



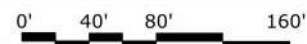
Clean Energy Base #1+2 illustrated on a 25 acre site

6.2 TRAINING FACILITY

There is a need for dedicated space to house the many different types and formats for training STA employees across all departments. Flexible classroom spaces, maintenance training bays and module storage, a fixed route driver's course and administrative training support spaces are all components that need dedicated, consolidated and centralized space. These spaces should be flexible and reconfigurable for a dual function to support various sized group gatherings, meetings and events. Further detailed programming will occur to right-size this facility, but it is expected to be around 51,300 sf. The driver's training course should be sized at 5 acres, which is smaller than the current 11 acre course but is expected to be sufficient.



Shown above is a generic, 10-acre parcel demonstrating an arrangement of the high-level program requirements and anticipated site constraints for a new Training facility.



6.2 TRAINING FACILITY

TRAINING

		% of SF	TOTAL SF	YEAR
ADMIN. - PUBLIC SPACES			0 SF	
	Entry Vestibule w Receptionist & Security	0%	0 SF	
	Board Room	0%	0 SF	
	Board Conf Room	0%	0 SF	
	Meeting Spaces	0%	0 SF	
	Public Restrooms	0%	0 SF	
	Board Restroom	0%	0 SF	
	Furniture Storage	0%	0 SF	
SHARED SPACES			1,819 SF	
	Conference Rooms (minus public meeting spaces)		0 SF	
	Café / Break Room / Drivers / Multi Purpose / TV	7%	574 SF	2030
	Health and Wellness Spaces	7%	458 SF	2030
	Lockers & Showers	7%	526 SF	2030
	General Building Storage & Mailroom	7%	262 SF	2030
TRAINING			40,040 SF	
	Classrooms and Training Areas	100%	9,240 SF	2030
	Maintenance Training Bays (Trainers' offices included in Human Resources)	100%	30,800 SF	2030
ADMINISTRATION			2,406 SF	
	Executive Wing		0 SF	
	Human Resources		0 SF	
	Chief / Human Resources Offices	0%	0 SF	
	Safety / Training Offices	90%	2,225 SF	2030
	Security	0%	0 SF	
	Communications & Customer Service		0 SF	
	Chief / Communications and Marketing	0%	0 SF	
	Business to Business	0%	0 SF	
	Customer Service	0%	0 SF	
	Web	0%	0 SF	
	Finance		0 SF	
	Chief / Payroll and Auditing	0%	0 SF	
	Procurement	0%	0 SF	
	Information Services	5%	181 SF	2030
	Records	0%	0 SF	
	Planning & Development		0 SF	
	Chief / Planning and Development Offices	0%	0 SF	
	Infrastructure Development	0%	0 SF	
	Service Development	0%	0 SF	
	Facilities Master Planning	0%	0 SF	
	Capital Development	0%	0 SF	
	BRT Development & Implementation	0%	0 SF	
	Planning and Grants	0%	0 SF	
	Community Development	0%	0 SF	
SERVICE DELIVERY - FIXED			0 SF	
	COO Offices	0%	0 SF	
	Supervisors and Dispatch	0%	0 SF	
	ZEB Storage / Charging	0%	0 SF	
PARATRANSIT			0 SF	
	Office Space	0%	0 SF	
	Van and Rideshare Storage	0%	0 SF	
MAINTENANCE			0 SF	
	Fixed Route Maintenance and Associated Office	0%	0 SF	
	Paratransit Maintenance and Associated Office	0%	0 SF	
FACILITIES & GROUNDS			2,381 SF	
	Office Space and Work Shops	5%	240 SF	2030
	Parking of STA Vehicles	5%	1,100 SF	2030
	Storage (Tools, Auction Items, Garbage/Rec., etc.) (Laydown Yard included in Exterior Spaces)	5%	1,041 SF	2030
OVERALL BUILDING SUBTOTALS			46,646 SF	
SUPPORT SPACES, ETC.			4,665 SF	2030
	Fire, Mechanical, Electrical, Com, Janitorial			
	Building Circulation, Restrooms			
	Exterior Walls, shafts, etc.			
OVERALL BUILDING TOTALS			51,311 SF	
EXTERIOR SPACES				
	Green areas for employees to gather	7%	840 SF	2030
	Drivers Training Course - New = 5 acres	100%	217,800 SF	2030
	Employee Parking - 313 Existing parking stalls - to 499 in 2050	7%	13,273 SF	2030
	Visitor Parking - 12 Existing parking stalls - to 18 in 2050	7%	479 SF	2030
	380 SF per parking stall includes circulation and landscaping			
	Facilities & Grounds Laydown Yard	0%	0 SF	
EXTERIOR SPACE TOTALS			232,392 SF	

6.3 CLEAN ENERGY BASE

		CEB #1			CEB #2		
		% of SF	TOTAL SF	YEAR	% of SF	TOTAL SF	YEAR
ADMIN. - PUBLIC SPACES	Entry Vestibule w Receptionist & Security	0%	0 SF		0%	0 SF	
	Board Room	0%	0 SF		0%	0 SF	
	Board Conf Room	0%	0 SF		0%	0 SF	
	Meeting Spaces	0%	0 SF		0%	0 SF	
	Public Restrooms	0%	0 SF		0%	0 SF	
	Board Restroom	0%	0 SF		0%	0 SF	
	Furniture Storage	0%	0 SF		0%	0 SF	
				0 SF			0 SF
SHARED SPACES	Conference Rooms (minus public meeting spaces)	42%	4,108 SF	2030	22%	2,159 SF	2035
	Café / Break Room / Drivers / Multi Purpose / TV	40%	3,288 SF	2030	20%	1,650 SF	2035
	Health and Wellness Spaces	40%	2,626 SF	2030	20%	1,318 SF	2035
	Lockers & Showers	40%	3,012 SF	2030	20%	1,512 SF	2035
	General Building Storage & Mailroom	40%	1,500 SF	2030	20%	753 SF	2035
			14,534 SF			7,391 SF	
TRAINING	Classrooms and Training Areas	0%	0 SF		0%	0 SF	
	Maintenance Training Bays (Trainers' offices included in Human Resources)	0%	0 SF		0%	0 SF	
			0 SF			0 SF	
ADMINISTRATION	Executive Wing	15%	266 SF		15%	266 SF	
	Human Resources						
	Chief / Human Resources Offices	90%	1,697 SF	2030	10%	189 SF	2035
	Safety / Training Offices	7%	165 SF	2030	7%	165 SF	2035
	Security	7%	155 SF	2030	7%	155 SF	2035
	Communications & Customer Service						
	Chief / Communications and Marketing	90%	2,396 SF	2030	10%	266 SF	2035
	Business to Business	100%	414 SF	2030	0%	0 SF	2035
	Customer Service	0%	0 SF	2030	0%	0 SF	2035
	Web	90%	1,692 SF	2030	10%	188 SF	2035
	Finance						
	Chief / Payroll and Auditing	90%	3,229 SF	2030	10%	359 SF	2035
	Procurement	80%	11,482 SF	2030	20%	2,870 SF	2035
	Information Services	80%	2,889 SF	2030	10%	361 SF	2035
	Records	90%	2,107 SF	2030	10%	234 SF	2035
	Planning & Development						
	Chief / Planning and Development Offices	100%	515 SF	2030	0%	0 SF	2035
	Infrastructure Development	90%	1,307 SF	2030	10%	145 SF	2035
	Service Development	90%	1,307 SF	2030	10%	145 SF	2035
	Facilities Master Planning	100%	138 SF	2030	0%	0 SF	2035
	Capital Development	90%	1,321 SF	2030	10%	147 SF	2035
BRT Development & Implementation	100%	138 SF	2030	0%	0 SF	2035	
Planning and Grants	90%	1,573 SF	2030	10%	175 SF	2035	
Community Development	90%	1,102 SF	2030	10%	122 SF	2035	
			33,892 SF			5,787 SF	
SERVICE DELIVERY - FIXED	COO Offices	52%	273 SF	2030	24%	126 SF	2035
	Supervisors and Dispatch	52%	2,352 SF	2030	24%	1,086 SF	2035
	ZEB Storage / Charging	33%	148,358 SF	2030	33%	148,358 SF	2035
			150,983 SF			149,570 SF	
PARATRANSIT	Office Space	0%	0 SF		0%	0 SF	
	Van and Rideshare Storage	0%	0 SF		0%	0 SF	
			0 SF			0 SF	
MAINTENANCE	Fixed Route Maintenance and Associated Office	40%	45,647 SF	2030	30%	34,235 SF	2035
	Paratransit Maintenance and Associated Office		0 SF			0 SF	
			45,647 SF			34,235 SF	
FACILITIES & GROUNDS	Office Space and Work Shops	20%	959 SF	2030	20%	959 SF	
	Parking of STA Vehicles	20%	4,400 SF	2030	20%	4,400 SF	
	Storage (Tools, Auction Items, Garbage/Rec., etc.) (Laydown Yard included in Exterior Spaces)	20%	4,166 SF	2030	20%	4,166 SF	
			9,525 SF			9,525 SF	
OVERALL BUILDING SUBTOTALS			254,581 SF			206,508 SF	
SUPPORT SPACES, ETC.	Fire, Mechanical, Electrical, Com, Janitorial Building Circulation, Restrooms Exterior Walls, shafts, etc.		25,458 SF	2030		20,651 SF	2035
OVERALL BUILDING TOTALS			280,039 SF			227,159 SF	
EXTERIOR SPACES	Green areas for employees to gather	40%	4,814 SF	2030	20%	2,416 SF	2035
	Drivers Training Course - New = 5 acres	0%	0 SF		0%	0 SF	
	Employee Parking - 313 Existing parking stalls - to 499 in 2050 Visitor Parking - 12 Existing parking stalls - to 18 in 2050 380 SF per parking stall includes circulation and landscaping	40%	76,067 SF	2030	20%	38,174 SF	2035
		40%	2,744 SF	2030	20%	1,377 SF	2035
	Facilities & Grounds Laydown Yard	0%	0 SF		0%	0 SF	
EXTERIOR SPACE TOTALS			83,625 SF			41,967 SF	

6.4 PROJECT COSTS

Early stage estimates have been produced to establish a rough order of magnitude (ROM) expectation for each of the identified projects. These estimates will be updated as programming refinements and pre-design scope of work exercises occur and as assumptions are further validated. The current estimates include building and site (where applicable) construction costs, estimated escalation factors and allowance for project soft costs (such as sales tax, surveying, engineering and design fees, plan review, permitting and impact fees, furnishings, fixtures and equipment, among other project administrative costs).

> Training Facility (51,300 sf + 5 ac)

ESTIMATED ROM COST OF CONSTRUCTION	\$ 23,649,100
<i>*assumes new construction: a mix of pre-engineered metal building and/or concrete tilt-up, with traditional construction</i>	
<i>*includes site development costs and contractor fees</i>	
ESTIMATED ESCALATION TO Q1 2027	\$ 2,583,197
PROJECT SOFT COST ALLOWANCE (45%)	\$ 11,804,534
TOTAL ROM PROJECT COST	\$ 38,036,830

> Board Room / Executive Suite (6,800 sf)

ESTIMATED ROM COST OF CONSTRUCTION	\$ 1,428,000
<i>*assumes cost for tenant improvement renovation and construction activities within an occupied building</i>	
<i>*includes contractor fees</i>	
ESTIMATED ESCALATION TO Q1 2026	\$ 75,970
PROJECT SOFT COST ALLOWANCE (35%)	\$ 526,389
TOTAL ROM PROJECT COST	\$ 2,030,359

> Clean Energy Base and Administrative Headquarters (280,000 sf)

ESTIMATED ROM COST OF CONSTRUCTION	\$100,800,000
<i>*assumes new construction: a mix of pre-engineered metal building and/or concrete tilt-up, with traditional construction</i>	
<i>*includes site development costs and contractor fees</i>	
ESTIMATED ESCALATION TO Q1 2027	\$ 29,821,535
PROJECT SOFT COST ALLOWANCE (40%)	\$ 52,248,614
TOTAL ROM PROJECT COST	\$182,870,150

Appendix F: Resolution

Pending Board action on December 18, 2025.