



**SALEM AREA MASS TRANSIT DISTRICT
BOARD OF DIRECTORS**

~ WORK SESSION ~

Monday, May 8, 2017
5:30 PM

Courthouse Square – Senator Hearing Room
555 Court Street NE, Salem, Oregon 97301

AGENDA

- 1. CALL TO ORDER** (President Bob Krebs)

- 2. DISCUSSION**
 - a. MV Contract Extension **1**
 - b. Title VI Plan Discussion **3**
 - c. Advertising RFP Update **363**
 - d. Review Draft FY2018 Board Meeting Schedule **365**
 - e. Strategic Planning Discussion

- 3. GENERAL MANAGER COMMENTS**
 - a. Draft Agenda for the May 25, 2017 Regular Meeting **367**
 - b. Upcoming Board Agenda Items **368**
 - c. Calendar Review **369**

Mission

*Connecting people with places
through safe, friendly, and reliable public transportation services*

Values

Safety – Service Excellence – Communication – Innovation – Accountability

SPECIAL ACCOMODATIONS Those individuals needing special accommodations such as sign or other language interpreters to participate in the Board meeting must request such services at least 48 hours prior to the meeting. Please direct your request to the Board Secretary at 503-588-2424. Hearing impaired please call Oregon Telecommunications Relay Service, 711.

NECESIDADES ESPECIALES Aquellos individuos que necesiten servicios especiales como Interpretes para el lenguaje de señales u otros, para participar en la reunión de la Junta, deben solicitar dichos servicios al menos 48 horas antes de la reunión. Por favor dirigir su solicitud al Secretario de la Junta al 503-588-2424. Las personas sordas por favor llamar al Servicio de Telecomunicaciones de Oregon, 711.

Salem-Keizer Transit ~ 555 Court St NE, Suite 5230 ~ Salem, OR 97301 Phone (503) 588-2424 ~ www.cherriots.org

MEMO TO: BOARD OF DIRECTORS

FROM: DAVID TRIMBLE, CHIEF OPERATING OFFICER

THRU: ALLAN POLLOCK, GENERAL MANAGER

SUBJECT: CONTRACT EXTENSION FOR CONTRACTED TRANSPORTATION SERVICES

Issue

Shall the Board authorize the General Manager to execute a six- (6) month contract extension with MV Transportation for Contracted Transportation Services to continue the provision of Cherriots LIFT, Cherriots Regional, Cherriots Shop and Ride, and the West Salem Connector Pilot Project?

Background and Findings

On June 25, 2015, the Board approved an action, which authorized the General Manager to enter into a contract with MV Transportation for Contracted Transportation Services, which included: Complementary ADA Paratransit Service (CherryLift), Chemeketa Area Regional Transportation Service (CARTS), and RED Line service. The current Contract is for a two-year term, from July 1, 2015, to June 30, 2017.

In preparation to re-procure this service, SAMTD staff engaged in an internal process to review the existing Contract to ensure the new request for proposal (RFP) was structured appropriately to provide for performance accountability and cost transparency. The Federal Transit Administration (FTA) requires the District to submit all RFP's utilizing federal funds for review. The FTA review has taken longer than expected and has delayed the solicitation process. Once the review is complete, the District is prepared to issue the RFP.

However, to continue the provision of Contracted Transportation Services, without interruption, until the successor contract is in place, it is necessary to extend the term of the current Contract from June 30, 2017, to December 31, 2017.

In response to the request for an extension, MV Transportation submitted a proposal for the six-month period at a rate of XXXXXX.

Fiscal Impacts

Funds for this contract extension are included in the proposed FY 2018 budget.

Recommendation

Staff recommends the Board authorize the General Manager to execute a six-month contract extension with MV Transportation for Contracted Transportation Services for the period July 1, 2017 to December 31, 2017 in the amount of XXXXXX.

Proposed Motion

I move the Board authorize the General Manager to execute a six-month contract extension with MV Transportation for Contracted Transportation Services for the period July 1, 2017, to December 31, 2017 in the amount of XXXXXXXXXXXXXXXX.

DRAFT

2017 Title VI Program

SALEM AREA MASS TRANSIT DISTRICT



Submitted in Fulfillment of Title VI
of the Civil Rights Act of 1964 and
FTA Circular 4702.1B



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Introduction

This document describes the Title VI program and policies of Salem Area Mass Transit District (SAMTD) developed in accordance with the Federal Transit Administration (FTA) Title VI Circular 4702.1B “Title VI Requirements and Guidelines for Federal Transit Administration Recipients” effective October 1, 2012 (“Circular”). This report is provided as documentation of compliance with Title VI of the Civil Rights Act of 1964 in accordance with FTA grant recipient requirements.

SAMTD, doing business as “Cherriots,” is a mass transit district created by the Oregon legislature pursuant to Oregon Revised Statutes (ORS) Chapter 267. SAMTD is a local government as defined under Oregon law, providing bus and ADA paratransit public transportation service in the Salem- Keizer metro area, providing about 2.9 million rides each year. Guided by a Board of Directors representing seven districts, the organization is directed by a General Manager appointed by the Board and employs approximately 300 union, non-union, and contract employees.

The Director of Transportation Development is chiefly responsible for administering and monitoring Title VI requirements, but it is the duty of every employee, vendor and contractor of the agency, to ensure compliance with nondiscrimination and to further civil rights’ protections. The SAMTD Board of Directors must also approve the agency’s Title VI program update prior to its submittal to FTA.

Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that:

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

Overview of Title VI

The intent of Title VI is to remove barriers and conditions that prevent minority, low income, Limited English Proficiency (LEP), and other disadvantaged groups and persons from receiving access, participation and benefits from federally assisted programs, services and activities. In effect, Title VI promotes fairness and equity in federally assisted programs and activities and is based on the fundamental principle that all human beings are created equal. Title VI is rooted in the constitutional guarantee that all human beings are entitled to equal protection of the laws and specifically addresses involvement of impacted persons in the decision making process.

Title VI Discrimination

There are many forms of illegal discrimination based on race, color, or national origin that can limit the opportunity of underrepresented communities to gain equal access to services and programs. In operating a federally assisted program, a recipient cannot, on the basis of race, color, or national origin, either directly or through contractual means:

- Deny program services, aids, or benefits;
- Provide a different service, aid, or benefit, or provide them in a manner different than they are provided to others; or
- Segregate or separately treat individuals in any matter related to the receipt of any service, aid, or benefit.

Additionally, related regulations and statutes expanded the range and scope of Title VI coverage and applicability to prohibit discrimination on the basis of disability, age, sex, income and LEP as an extension of national origin.

Programs Covered by Title VI

The Civil Rights Restoration Act of 1987 amended each of the affected statutes by adding a section defining the word "program" to make clear that discrimination is prohibited throughout an entire agency if any part of the agency receives Federal financial assistance.

Approximately 30 Federal agencies provide Federal financial assistance in the form of funds, training, and technical and other assistance to State and local governments, and non-profit and private organizations. These recipients of Federal assistance, in turn, operate programs and deliver benefits and services to individuals (known as "beneficiaries") to achieve the goals of the Federal legislation that authorizes the programs.

If a unit of a state or local government is extended Federal aid and distributes such aid to another governmental entity, all of the operations of the entity which distribute the funds and all of the operations of the department or agency to which the funds are distributed are covered. Corporations, partnerships, other private organizations, or sole proprietorships are covered in their entirety if such an entity receives Federal financial assistance to it as a whole or if it is principally engaged in certain types of activities.

Definitions

The following terms and definitions are from FTA Circular 4702.1B unless otherwise noted.

Demand Response System – Any non-fixed route system of transporting individuals that requires advanced scheduling including services provided by public entities, non-profits, and private providers. An advance request for service is a key characteristic of demand response service.

Designated Recipient – An entity designated, in accordance with the planning process under sections 5303 and 5304, by the Governor of a State, responsible local officials, and publicly owned operators of public transportation, to receive and apportion amounts under section 5336 to urbanized areas of 200,000 or more in population; or a State or regional authority, if the authority is responsible under the laws of a State for a capital project and for financing and directly providing public transportation.

Direct Recipient – An entity that receives funding directly from FTA. For purposes of Title VI, a direct recipient is distinguished from a primary recipient in that a direct recipient does not extend financial assistance to subrecipients, whereas a primary recipient does.

Discrimination – Any action or inaction, whether intentional or unintentional, in any program or activity of a Federal aid recipient, subrecipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.

Disparate Impact – A facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more

alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

Disproportionate Burden – A neutral policy or practice that disproportionately affects low income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

Disparate Treatment – Actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e., less favorably) than others because of their race, color, or national origin.

Environmental Justice – Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” was signed by President Clinton on February 11, 1994. Subsequent to issuance of the Executive Order, the U.S. Department of Transportation (DOT) issued a DOT Order for implementing the Executive Order on environmental justice (EJ). The DOT Order (Order 5610.2(a), “Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” 77 FR 27534, May 10, 2012) describes the process the Department and its modal administrations (including FTA) will use to incorporate EJ principles into programs, policies, and activities.

Fixed Route – Public transportation service provided in vehicles operated along predetermined routes according to a fixed schedule.

Federal Financial Assistance – refers to: (1) grants and loans of Federal funds; (2) the grant or donation of Federal property and interests in property; (3) the detail of Federal personnel; (4) the sale and lease of, and the permission to use (on other than a casual or transient basis), Federal property or any interest in such property

without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient; and (5) any Federal agreement, arrangement, or other contract that has as one of its purposes the provision of assistance.

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

Low-Income Persons – Persons whose median household income is at or below 150 percent of the U.S. Department of Health and Human Services (HHS) poverty guidelines.

Low-Income Population – Any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/ transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.

Metropolitan Planning Organization (MPO) – The policy board of an organization created and designated to carry out the metropolitan transportation planning process.

Minority Persons – Include the following:

- American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- Asian, which refers to people having origins in any of the original

peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

- Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
- Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central America, or other Spanish culture or origin, regardless of race.
- Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

Minority Population – Any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed Department of Transportation (DOT) program, policy, or activity.

Minority Transit Route – In conformance with FTA C4702.1B, a route that has at least one third of its total revenue mileage in a U.S. Census tract with a percentage of minority population that exceeds the percentage of minority population in the transit service area.

National Origin – The particular nation in which a person was born, or where the person's parents or ancestors were born.

Noncompliance – An FTA determination that the recipient is not in compliance with the DOT Title VI regulations, and has engaged in activities that have had the purpose or effect of denying persons the benefits of, excluding from participation in, or subjecting persons to discrimination in the recipient's program or activity on the basis of race, color, or national origin.

Non-Profit Organization – A corporation or association determined by the Secretary of the Treasury to be an organization described by 26 U.S.C. 501(c) which is exempt from taxation under 26 U.S.C. 501(a) or one which has been determined under State law to be non-profit and for which the designated State agency has received documentation certifying the status of the non-profit organization.

Predominantly Minority Area – A geographic area, such as a neighborhood, Census tract, block or block group, or traffic analysis zone, where the proportion of minority persons residing in that area exceeds the average proportion of minority persons in the recipient's service area.

Public Transportation – Regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability, or low-income; and does not include Amtrak, intercity bus service, charter bus service, school bus service, sightseeing service, courtesy shuttle service for patrons of one or more specific establishments, or intra-terminal or intra-facility shuttle services. Public transportation includes buses, subways, light rail, commuter rail, monorail, passenger ferry boats, trolleys, inclined railways, people movers, and vans. Public transportation can be either fixed route or demand response service.

Recipient – Any public or private entity that receives Federal financial assistance from FTA, whether directly from FTA or indirectly through a primary recipient. This term includes subrecipients, direct recipients, designated recipients, and primary recipients. The term does not include any ultimate beneficiary under any such assistance program.

Service Area – The geographic area in which a transit agency is authorized by its charter to provide service to the public. In the case of SAMTD, that area is inside the Salem-Keizer Urban Growth Boundary for Cherriots, CherryLift, and RED Line service and all of Marion and

Polk Counties for Cherriots Regional express routes. Two Cherriots Regional express routes provide service between Salem and Wilsonville, and between Salem and central / western Polk County through agreements with South Metro Area Regional Transit (SMART) and the Confederated Tribes of Grand Ronde, respectively.

Service Standard / Policy – An established service performance measure or policy used by a transit provider or other recipient as a means to plan or distribute services and benefits within its service area.

Subrecipient – An entity that receives Federal financial assistance from FTA through a primary recipient.

Title VI Program – A document developed by an FTA recipient to demonstrate how the recipient is complying with Title VI requirements. Direct and primary recipients must submit their Title VI Programs to FTA every three years. The Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA.

Transit Equity – SAMTD defines Transit Equity as policies that promote the equitable distribution of burdens and benefits, promote equal access to resources and services, and engage transit-dependent riders in meaningful planning and decision-making processes.

Transit Provider – Any entity that operates public transportation service, and includes states, local and regional entities, and public and private entities. This term is inclusive of direct recipients, primary recipients, designated recipients, and subrecipients that provide fixed route public transportation service.

Part I: General Requirements

FTA requires that all direct and primary recipients of Federal financial assistance document their compliance by submitting a Title VI Program to their FTA regional civil rights officer once every three years. The Title VI Program must be approved by the direct or primary recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. Attachment A contains copies of the SAMTD Board of Directors resolutions adopting the Title VI Program and its associated policies. The General Reporting Requirements section of this report contains Title VI Program components required in Chapter III of FTA circular 4702.1B. This section includes the following information:

1. Title VI Public Notice
2. Title VI Complaint Procedures
3. Title VI Complaint Form
4. List of Title VI Investigations, Complaints, and Lawsuits
5. Public Participation Plan
6. Language Assistance Plan
7. Board Membership and Recruitment
8. Subrecipient Monitoring
9. Facilities Siting and Construction
10. Major Service and Fare Change Equity Analyses
11. Board Approval of the 2017 Title VI Program Update

[Title VI Notice to the Public](#)

The Title VI Civil Rights Notice to the Public is attached in Attachment B. This notice is translated into Spanish and Russian and posted in the following locations:

1. On the Cherriots website¹
2. In every Cherriots, Cherriots Regional, RED Line, CherryLift and West Salem Connector bus
3. In the Cherriots Customer Service lobby at the Salem Downtown Transit Center
4. In each passenger waiting shelter at the Keizer Transit Center

Title VI Complaint Procedures

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color or national origin may file a written complaint with Salem Area Mass Transit District (SAMTD) to 555 Court St., NE Suite 5230, Salem, Oregon 97301. Complainants have the right to complain directly to the appropriate federal agency.

The complaint procedures, i.e., instructions to the public regarding how to file a Title VI discrimination complaint, are posted on the Cherriots website² and can be found in Attachment C.

The Title VI complaint form can also be found on the Cherriots website³ and in Attachment D. This form uses simple language and large print text to communicate the requirements for filing a complaint.

List of Title VI Investigations, Complaints, and Lawsuits

There have been no Title VI investigations, complaints, or lawsuits filed with SAMTD since May 22, 2014.

Any such cases receive special attention by the Title VI officer and follow the procedure outlined in Attachment C.

¹<http://cherriots.org/sites/default/files//TitleVINotice.pdf>

²<http://cherriots.org/sites/default/files/TitleVIComplaintProcedures.pdf>

³<http://cherriots.org/sites/default/files/TitleVIComplaintForm.pdf>

Public Participation Plan

SAMTD uses the Public Participation Plan (PPP) of the regional transportation planning process in the Salem-Keizer urban area. This PPP was adopted by the Salem-Keizer Area Transportation Study (SKATS) Policy Committee on April 23, 2013, and is administered by the Mid-Willamette Valley Council of Governments (MWVCOG). A copy of the PPP is provided in Attachment E. One of the SAMTD Board members is a voting member of the SKATS Policy Committee, and since the committee only approves programs and policies with 100% consensus, it follows that any policy or program adopted by the SKATS Policy Committee is representative of SAMTD.

The following is a summary of SAMTD's inclusive public participation since December, 2009 when SAMTD last submitted a Title VI program to FTA. The summary below includes all outreach events held from December, 2009 to May, 2014. It covers all fare and service changes as well as the construction projects completed during that period

Public Participation Highlights

The following is a summary of SAMTD's inclusive public participation since its 2014 Title VI Program submission. The summary spans from June 2014 to April 2017. During this period SAMTD conducted outreach for:

2015 Fare Change

Outreach events were held for the January 2015 fare change at the Customer Service lobby of the Downtown Transit Center, Chemeketa Community College, and various high schools, senior centers, and neighborhood associations throughout Salem and Keizer; a Mexican Festival in Woodburn was staffed to promote CARTS (now Cherriots Regional) and talk about the fare change as well; events began in August 2014 and continued through November 2014.

West Salem Connector On-Demand Pilot Project

In preparation for the June 2015 launch of West Salem Connector included events held at two West Salem grocery stores and visiting the neighborhood association to talk about the upcoming pilot project that replaced a fixed-route service for a demand responsive system.

Moving Forward Comprehensive Service Change

A comprehensive service analysis completed by a private consulting firm for the “Moving Forward” project in late 2014 included a stakeholder meeting in November 2014.

Outreach events were held after the consultant’s final recommendations were accepted at multiple Saturday/Community Farmers’ markets, neighborhood associations, senior/community centers, and local schools such as Chemeketa Community College.

CARTS Redesign

Outreach for the original CARTS redesign project conducted by a private consulting firm included stakeholder meetings in Keizer, Stayton, Dallas, and Woodburn during the months of November and December 2015.

The draft plan of the CARTS Redesign project was approved in February 2016 by the SAMTD Board of Directors and subsequent events were held in September and October 2016 to gain feedback on the draft plan and schedules. These events were held at twelve locations throughout Marion and Polk Counties. A survey was also conducted online and on the buses.

2016 Fare Survey

A rider survey was conducted on board Cherriots and CARTS buses in May and June 2016 to gain valuable information regarding how people pay for their fares.

Coordinated Transportation Plan

SAMTD's Coordinated Public Transportation Human Services Transportation Plan (The Coordinated Plan) was updated in August, 2016. Outreach events included meetings in Salem, Dallas, Woodburn, and Aumsville during May and June 2016 to gain public feedback.

Ongoing Service Changes

Service changes occurring every three or four months require notifying passengers via the website, monitors at transit centers, via social media and email posts, and through "take-one" flyers on the buses.

Title VI 2017 Program Update

In April 2017, Planning staff presented proposed revisions to the Title VI Program policies to the SAMTD Board's STF Advisory Committee and the City of Salem's Human Rights and Relations Advisory Commission. These presentations directly informed staff of the direction needed for the updated program and policies.

Language Assistance Plan

For SAMTD's Language Assistance Plan, see Attachment F. The plan describes the process used by SAMTD for conducting a Limited English proficiency (LEP) needs assessment based on the four-factor framework in Section V of the DOT LEP Guidance. The four-factor analysis allows SAMTD to be in a better position to implement a cost-effective mix of language assistance measures and to target resources appropriately.

What is analyzed in the four-factor analysis?

1. The **number or proportion** of LEP persons eligible to be served or likely to be encountered by the program or recipient
2. The **frequency** with which LEP individuals come into contact with SAMTD's programs
3. The **nature and importance** of the program, activity, or service provided by the program to people's lives
4. The **resources available** to SAMTD for LEP outreach, as well as the costs associated with that outreach

2011-2015 American Community Survey

Data was gathered from the U.S. Census American Community Survey (ACS) 5-Year Estimate (2011-15) for Marion and Polk counties and for the Salem Census County Division (CCD), which approximates the area inside the Salem-Keizer UGB. Since the percentages of average LEP populations for the two counties was within one or two percentage points of the Salem CCD, SAMTD will use the values for the counties as a whole. This will ensure that the regional and local services are treated equally. Table I-1 displays the numbers below.

Table I-1. Language Spoken at Home by Ability to Speak English for the Population 5 Years Old and Over for Marion and Polk Counties

	Population Estimate	Population Percent
Speaks English “very well”	373,376	91.4%
Speaks English less than “very well”	35,023	8.6%
Spanish speakers	29,579	7.2%
Russian speakers	1,789	0.4%
Other language speakers	3,655	0.9%
Total for Marion and Polk Counties	408,399	100%

Source: ACS 2011-15, Table B16002

Data provided by the 2011-15 American Community Survey 5-Year Estimate above show that more than 1,000 individuals who speak English less than “very well” reside in Marion and Polk Counties. The majority of these LEP persons speak Spanish, and the second highest LEP are Russian speakers.

The LEP safe harbor provision states that if 5% or 1,000 individuals are LEP and live in the transit service area, SAMTD must address these populations with additional language assistance including the publication of the Title VI Notice to the Public in those languages.

Figures I-1 and I-2 show the concentration of LEP individuals in relation to the area averages. Figure I-1 shows the percentage of population considered LEP by U.S. Census block group for Marion and Polk Counties. Figure I-2 displays the Percentage of Population considered LEP by U.S. Census block group within the Salem-Keizer Urban Growth Boundary (UGB). The average LEP population is 8.6 percent for Marion and Polk Counties, together.

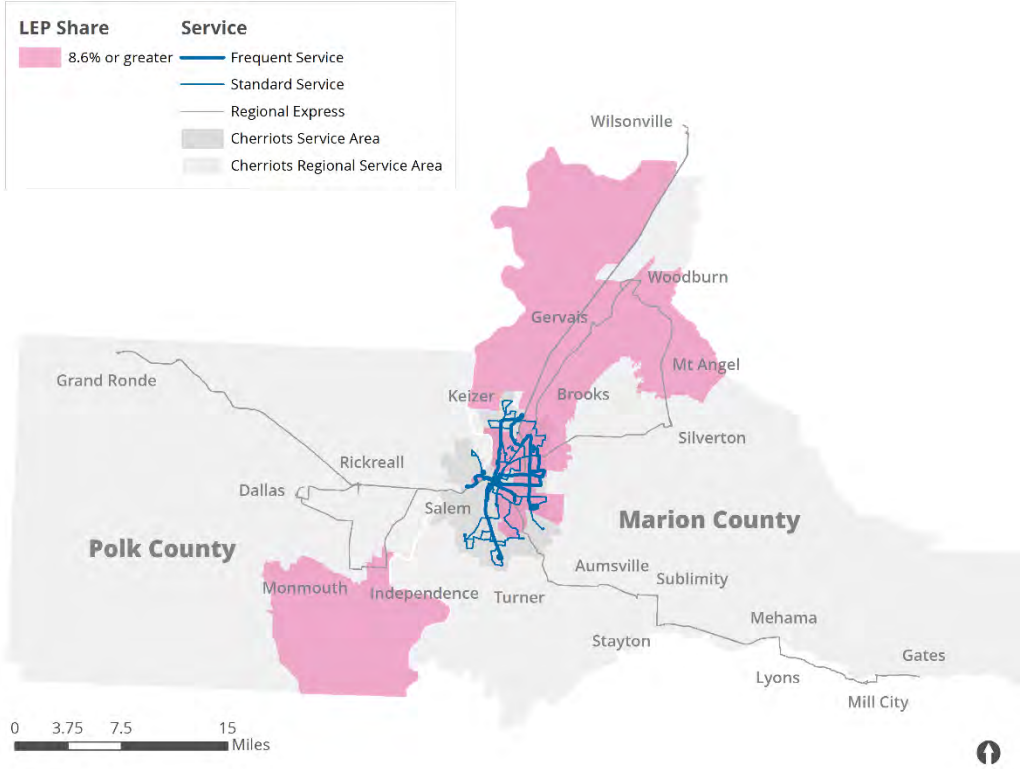
Following the Department of Transportation’s and Department of

Justice's Safe Harbor Provision for LEP communications, SAMTD has translated its Title VI Policy statement into Russian since June 2014 due to a large population of LEP Russian speakers in the city of Woodburn who speak English less than "very well," and are served by Cherriots Regional buses. The Title VI Notice to the Public is posted in all three languages in all Cherriots, Cherriots Regional, RED Line, CherryLift, and West Salem Connector vehicles.

The Safe Harbor Provision stipulates that, "if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations." The Spanish-speaking LEP group is the largest with approximately 30,000 people, and the Russian-speaking LEP group is the second largest at around 1,800 people.

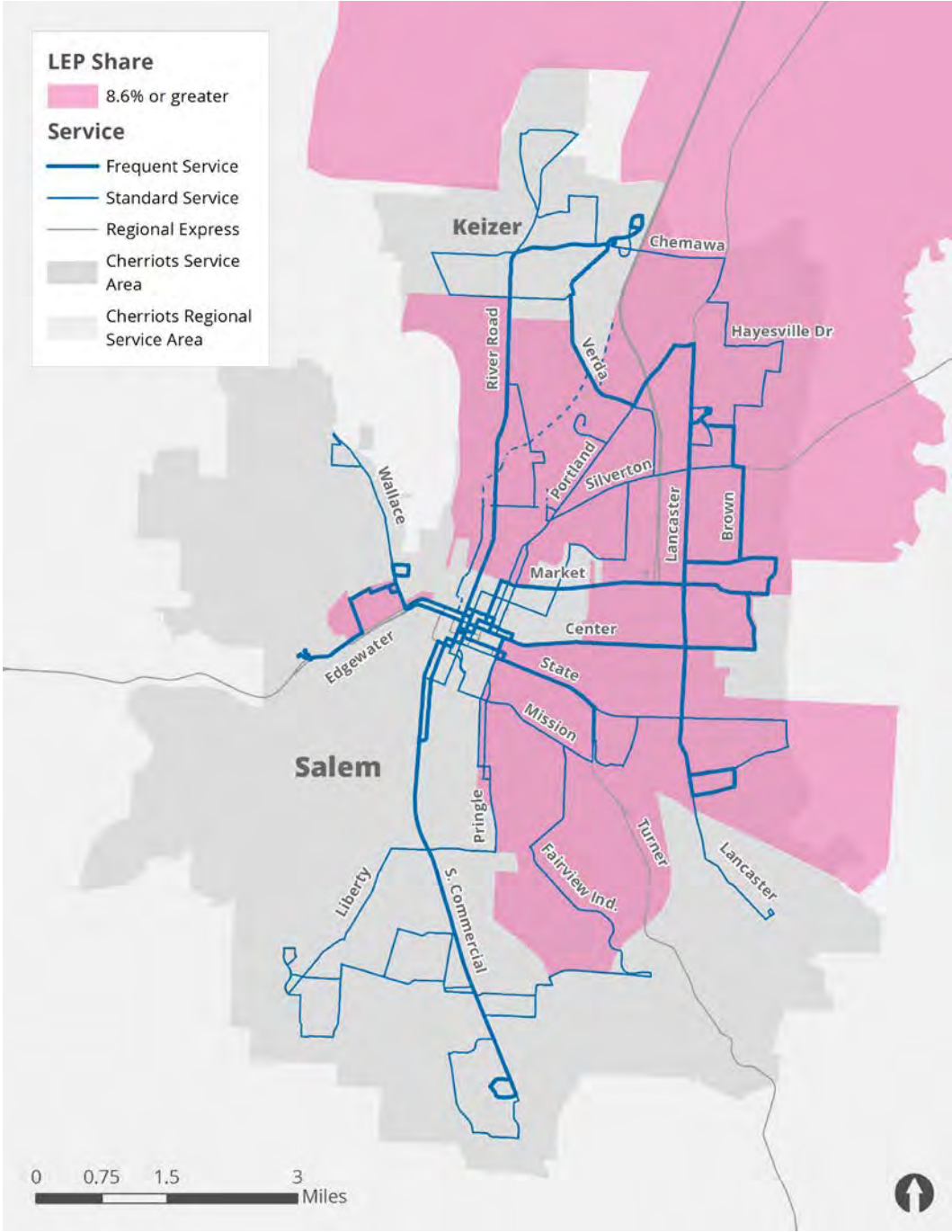
While specific areas within the Salem-Keizer area have higher residential concentrations of LEP populations, the use of the transit system by LEP populations is not limited to the locations of their homes. Employment, medical services, government offices, and shopping opportunities are widespread throughout the community. Based on this information SAMTD has elected to apply assistance to LEP populations with geographic equity.

Figure I-1. Areas in Marion and Polk Counties with Greater than Regional Average Limited English Proficiency (LEP)



Source: ACS 2011-15, Table B16002

Figure I-2. Areas in the Salem Urban Growth Boundary with Greater than Regional Average Limited English Proficiency (LEP)



Source: ACS 2011-15, Table B16002

Committee Membership and Recruitment

SAMTD's Board of Directors approved a formal policy to encourage minority participation on its non-elected committees at its Board meeting on May 22, 2014. Table I-2 below details the existing racial breakdown of the members of these two committees:

Table I-2. Race and Ethnicity of Members of Non-Elected Committees

Race and Ethnicity	Marion and Polk Counties Population		Special Transportation Fund Advisory Committee		Budget Committee	
	Count	Share	Count	Share	Count	Share
White*	282,516	69%	6	86%	7	100%
Hispanic	96,393	24%	0	0%	0	0%
Asian*	6,952	2%	0	0%	0	0%
Black*	4,487	1%	1	14%	0	0%
Native Hawaiian and Pacific Islander*	3,218	1%	0	0%	0	0%
American Indian and Alaskan Native*	2,601	1%	0	0%	0	0%
Other*	13,924	3%	0	0%	0	0%
All	410,091	100%	7	100%	7	100%

Source: ACS 2011-15, Table C03002

*Excludes Hispanic Population

The population of the SAMTD service area averages 30.6% minority according to the U.S. Census American Community Survey 5-year estimate (2011-2015). SAMTD has a goal over the next three years to increase participation on the non-elected committees to match or exceed this demographic average.

Subrecipient Monitoring

SAMTD is the primary recipient for Section 5310 dollars for Marion and Polk Counties, Oregon. Currently, SAMTD has entered into agreements with two non-profit organizations to award them Special Transportation Fund (STF) and 5310 grant dollars. SAMTD also has agreements with two cities in Marion County to provide public transportation services. The STF and 5310 grant funds are pass-through funds from the Oregon Department of Transportation (ODOT). SAMTD also receives 5310 funds directly from the Federal Transit Administration (FTA), but currently does not have any external subrecipients for those grant funds.

As shown in Attachment G, Policy #710 outlines the policy for subrecipient monitoring in regards to Title VI issues. Subrecipients must submit their Title VI programs to SAMTD once every three years or whenever changes or amendments are added. SAMTD staff will perform an annual inspection of subrecipients' complaint records and shall be notified if any lawsuit is filed against the subrecipient that relates to discrimination based on race, color, or national origin. The annual inspection may include a site visit and an inspection of the subrecipient's vehicles, operations centers, Customer Service areas, etc.

The two non-profit organizations receiving STF and 5310 pass-through grant funds are Silverton Health and Salem Health Foundation (West Valley Hospital). The two cities are the City of Woodburn and the City of Silverton. None of the subrecipients have had any Title VI lawsuits

or complaints related to transportation-related services since the date of the last Title VI Program submittal (June 2014). Silverton Health and West Valley Hospital have dedicated staff who administer their civil rights and non-discrimination policies. Due to the fact that they are hospitals which accept Federal funds for their daily operations, they must be able to serve anyone and do not discriminate based on race, color, or national origin, including LEP persons. Copies of the subrecipient Title VI documents detailing their program policies can be found in Attachment H.

Facilities Siting and Construction

No new major facilities were constructed since June 2014 by SAMTD. However, one facility is in the planning stages.

South Salem Transit Center

The project consists of the construction of a transit center on a portion of a Walmart parking lot in the south of Salem. The transit center would include six bus bays and bus shelters, driver and passenger amenities, landscaping, stormwater facilities, and reconfiguring a portion of the Walmart parking lot adjacent to the transit center. An Environmental Justice Analysis was performed in the site selection process of this facility, which is part of the Categorical Exclusion (CE) worksheet provided in Attachment P. As taken from the CE worksheet:

The project would not displace any residences, businesses, or social services so it would not be expected to change the study area's existing community cohesion or reduce the economic vitality. In addition, the South Salem Transit Center would be located along an already busy transportation corridor that includes transit service and would not increase noise levels or air pollution in the study area. Temporary impacts during construction, such as noise, air pollution and potential traffic delays, would be expected and would be the same for all populations. Furthermore, the minority and low-income populations in

the study area are either comparable to, or notably smaller than, those in the City of Salem as a whole. Therefore, environmental justice populations would not be expected to receive a disproportionately high and adverse portion of the project's impacts.

Major Service Change and Fare Change Equity Analyses

SAMTD considers possible equity impacts in developing potential service and fare changes, and evaluates proposals for Major Service Changes and any fare changes for potential adverse effects, Disparate Impacts, and/or Disproportionate Burdens.

Since the time of the last Title VI Program submittal SAMTD has implemented several improvements to service and one change to fares. The four reports noted below cover the equity analyses of all Major Service Changes and fare changes implemented since June 2014, and are provided as Attachments J-M, along with corresponding documentation of the SAMTD board's consideration, awareness, and approval of each.

- **2015 Fare Change Public Engagement and Equity Analysis**
 - Board approval at the October 23, 2014 Board meeting
- **Moving Forward Phase I Service Change Equity Analysis**
 - Board approval at the May 28, 2015 Board meeting
- **Route 15X Restoration Title VI Equity Analysis**
 - Board approval at the April 28, 2016 Board meeting
- **Cherriots Regional Title VI Equity Analysis**
 - Board approval at the April 27, 2017 Board meeting

Part II. Title VI Policies

This section provides the following policies, as approved by the SAMTD Board of Directors.

- **Service Change Policies**
 - Major Service Changes Policy
 - Disparate Impact for Service Changes Policy
 - Disproportionate Burden for Service Changes Policy

- **Fare Change Policies**
 - Fare Change Policy
 - Disparate Impact for Fare Changes Policy
 - Disproportionate Burden for Fare Changes Policy

Each officially adopted policy is presented in Attachment G.

[Major Service Changes Policy](#)

The purpose of this policy is to establish the definition of a Major Service Change that has a potential disparate impact on minority populations or a potential disproportionate burden on low-income people.

All changes in service which are considered a Major Service Change are subject to a Title VI Equity Analysis prior to Board approval of the service change.

Major Service Change Definition

SAMTD defines a Major Service Change as:

1. Either a reduction or an expansion in service of:
 - a. 15 percent or more of the number of transit route miles based on the miles of an average round-trip of the route

(this includes routing changes where route miles are neither increased nor reduced (i.e., re-routes)), or;

- b. 15 percent or more of a route's frequency of the service (defined as the average hourly frequency throughout one service day for local fixed routes and as daily round trips for regional express routes) on a daily basis for the day of the week for which a change is made or;
 - c. 15 percent in the span (hours) of a route's revenue service (defined as the time between the first served stop of the day and the last stop), on a daily basis for the day of the week for which a change is made;
2. A transit route split where either of the new routes meet any of the above thresholds when compared to the corresponding piece of the former route.
 3. A new transit route is established.

A Major Service Change occurs whether the above thresholds are met:

1. Within a single service proposal, or;
2. Due to a cumulative effect of routing, frequency, or span changes over the year prior to the analysis.

Public Hearing Requirements

SAMTD shall hold a public hearing when any Major Service Change proposed that results in a decrease in service. Notice must be published in a general circulation newspaper. In addition, notice will be placed in newspapers, publications, or websites that are oriented to

specific groups or neighborhoods that may be affected by the proposed fare change. The notice must be published at least 30 days prior to the hearing. The notice must contain a description of the proposed service reduction, and the date, time, and place of the hearing.

Exemptions

The following service changes are exempt:

1. Standard seasonal variations in service are not considered Major Service Changes.
2. In an emergency situation, a service change may be implemented immediately without Disparate Impact or Disproportionate Burden Analyses being completed. These analyses will be completed if the emergency change is to be in effect for more than twelve months and if the change(s) meet the definition of a Major Service Change. Examples of emergency service changes include but are not limited to those made because of the collapse of a bridge over which bus routes cross, major road or rail construction, or inadequate supplies of fuel.
3. Experimental service changes may be implemented by SAMTD for twelve months or less in order to test certain markets, new modes of transit service, etc.

Disparate Impact for Service Changes Policy

The Disparate Impact for Service Changes Policy establishes a threshold for determining whether a given action has a potential disparate impact on minority populations.

In the course of performing a Title VI equity analysis for possible disparate impact, SAMTD will analyze how the proposed Major Service Change could impact minority populations, as compared to non-minority populations.

Disparate Impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin...

In the event the proposed action has an adverse impact that affects minority populations more than non-minority populations at a level that exceeds the thresholds established in the adopted Disparate Impact for Service Changes Policy, or that restricts the benefits of the service change to protected populations, the finding would be considered as a potential disparate impact. Given a potential disparate impact, SAMTD will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, SAMTD will take measures to minimize or mitigate the adverse impact of the proposed action.

From the Title VI Circular

The [Disparate Impact] policy shall establish a threshold for determining when adverse effects of fare/service changes are borne disproportionately by minority populations. The Disparate Impact threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by minority populations compared to impacts borne by non-minority populations. The Disparate Impact threshold must be applied uniformly... and cannot be altered until the next Title VI Program submission.

The Disparate Impact for Service Changes Policy defines measures for determination of potential disparate impact on minority populations resulting from Major Service Changes. The policy is applied to both adverse effects and benefits of Major Service Changes.

Adverse Effects Analysis

Adverse effects of Major Service Changes are defined as:

1. A decrease in the level of transit service (hours, days, and/or frequency); and/or
2. Decreased access to comparable transit service, which is defined as an increase of the access distance to beyond:
 - a. One quarter mile for bus stops served by less than four buses per hour during peak times, or;
 - b. One half mile for bus stops served by four or more buses per hours during peak times, as well as for all regional express service.

Disparate Impact Analysis

The determination of disparate impact associated with service changes

is defined separately for impacts of changes on individual route, and for system-level impacts of changes on more than one route, as well as for both service reductions and service improvements:

1. In the event of potential adverse effects resulting from service reductions:

- a. A Major Service Change to a single route will be considered to have a potential disparate impact if the percentage of impacted minority population in the service area of the route exceeds the percentage of minority population of Marion and Polk Counties by at least 5 percentage points (e.g., 36 percent compared to 31 percent).
- b. To determine the system-wide impacts of Major Service Change reductions on more than one route, the percentage of Marion and Polk Counties' minority population that is impacted is compared to the percentage of Marion and Polk Counties' non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent greater than the percentage of the non-minority population impacted (e.g., 12 percent compared to 10 percent), the overall impact of changes will be considered disparate.

2. In the event of service improvements:

- a. A major service change to a single route will be considered to have a potential disparate impact if:
 - i. The improvement is linked to other service

changes that have disproportionate and adverse effects on minority populations, or;

- ii. The percentage of impacted minority population in the service area of the route is less than the percentage of minority population of Marion and Polk Counties by at least 5 percentage points (e.g., 26 percent compared to 31 percent).
- b. To determine the system-wide impacts of Major Service Change improvements on more than one route, the percentage of Marion and Polk Counties' minority population that is impacted is compared to the percentage of Marion and Polk Counties' non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent less than the percentage of the non-minority population impacted (e.g., 8 percent compared to 10 percent), the overall impact of the changes will be considered disparate.

Avoid, Minimize, Mitigate, or Justify

Upon determination of a disparate impact, SAMTD will either:

- a. Alter the service proposal to avoid, minimize, or mitigate potential disparate impacts, or;
- b. Provide a substantial legitimate justification for keeping the proposal as-is, and show that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish the project or program goals.

Disproportionate Burden for Service Changes Policy

The Disproportionate Burden for Service Changes Policy establishes a threshold for determining whether a given action has a potential disproportionate burden on low-income populations.

In the course of performing a Title VI equity analysis for possible disproportionate burden, SAMTD will analyze how the proposed Major Service Change could impact low-income populations, as compared to non-low-income populations.

From the Title VI Circular

The [Disproportionate Burden] policy shall establish a threshold for determining when adverse effects of fare/ service changes are borne disproportionately by low-income populations. The disproportionate burden threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by low-income populations as compared to impacts born by non-low-income populations.. The disproportionate burden threshold must be applied uniformly... and cannot be altered until the next [Title VI] program submission....

In the event the proposed action has an adverse impact that affects low-income populations more than non-low-income populations at a level that exceeds the thresholds established in the adopted Disproportionate Burden for Service Changes Policy, or that restricts the benefits of the service change to protected populations, the finding would be considered as a potential disproportionate burden. Given a potential disproportionate burden, SAMTD will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, SAMTD will take measures to minimize or mitigate the adverse impact of the proposed action.

The Disproportionate Burden for Service Changes Policy defines measures for determination of potential disproportionate burden on low-income populations resulting from Major Service Changes. The policy is applied to both adverse effects and benefits of Major Service Changes.

Adverse Effects Analysis

Adverse effects of service changes are defined as:

1. A decrease in the level of transit service (hours, days, and/or frequency); and/or
2. Decreased access to comparable transit service, which is defined as an increase of the access distance to beyond:
 - a. One quarter mile for bus stops served by less than four buses per hour during peak times, or;
 - b. One half mile for bus stops served by four or more buses per hours during peak times, as well as for all regional express service.

Disproportionate Burden Analysis

The determination of disproportionate burden associated with service changes is defined separately for impacts of changes on individual route, and for system-level impacts of changes on more than one route, as well as for both service reductions and service improvements:

1. In the event of potential adverse effects resulting from service reductions:
 - a. A Major Service Change to a *single route* will be considered to have a potential disproportionate burden if

the percentage of impacted low-income population in the service area of the route exceeds the percentage of low-income population of Marion and Polk Counties by at least 5 percentage points (e.g., 36 percent compared to 31 percent).

- b. To determine the *systemwide* impacts of Major Service Change reductions on more than one route, the percentage of Marion and Polk Counties' low-income population that is impacted is compared to the percentage of Marion and Polk Counties' non-low-income population that is impacted. If the percentage of the low-income population impacted is at least 20 percent greater than the percentage of the non-low-income population impacted (e.g., 12 percent compared to 10 percent), the overall impact of changes (burden) will be considered disproportionate.

2. In the event of service improvements:

- a. A major service change to a *single route* will be considered to have a potential disproportionate burden if:
 - i. The improvement is linked to other service changes that have disproportionate and adverse effects on low-income populations, or;
 - ii. The percentage of impacted low-income population in the service area of the route is less than the percentage of low-income population of Marion and Polk Counties by at least 5 percentage points (e.g., 26 percent compared to 31 percent).

- b. To determine the *systemwide* impacts of major service change improvements on more than one route, the percentage of Marion and Polk Counties' low-income population that is impacted is compared to the percentage of Marion and Polk Counties' non-low-income population that is impacted. If the percentage of the low-income population impacted is at least 20 percent less than the percentage of the non-low-income population impacted (e.g., 8 percent compared to 10 percent), the overall impact of changes (burdens) will be considered disproportionate.

Avoid, Minimize, Mitigate, or Justify

Upon determination of disproportionate burden, SAMTD will either:

- a. Alter the service proposal to avoid, minimize, or mitigate potential disproportionate burdens, or;
- b. Provide a substantial legitimate justification for keeping the proposal as-is, and show that there are no alternatives that would have a less disproportionate burden on low-income riders but would still accomplish the project or program goals.

Fare Changes Policy

The purpose of this policy is to establish the definition of a fare change that has a potential disparate impact on minority populations or a potential disproportionate burden on low-income people.

All fare changes are subject to a Title VI Equity Analysis prior to Board approval of the service change. A Title VI Equity Analysis will be completed for all fare changes and will be presented to the Board of Directors for its consideration and included in the subsequent SAMTD Title VI Program report with a record of action taken by the Board.

Fare Change Definition

A fare change is any increase or decrease in transit passenger fares. An increase is made when there is an increase in any cash fare or in the cost of any passes, tickets, transfers, or other means by which transit riders pay for their trips. A fare decrease is defined when the price of any of the above fare options is lowered.

Public Hearing Requirements

SAMTD shall hold a public hearing when a fare decrease is proposed. Notice must be published in a general circulation newspaper. In addition, notice will be placed in newspapers, publications, or websites that are oriented to specific groups or neighborhoods that may be affected by the proposed fare change. The notice must be published at least 30 days prior to the hearing. The notice must contain a description of the proposed fare change, and the date, time, and place of the hearing.

Exemptions

The following fare changes are exempt:

1. "Spare the air days" or other instances SAMTD has declared that all passengers ride free.
2. Temporary fare reductions that are mitigating measures for other actions. For example, construction activities may close a segment of a transit center for a period of time and require passengers to alter their travel patterns. A reduced fare for these impacted passengers is a mitigating measure and does not require a fare equity analysis.
3. Experimental fare changes may be implemented by SAMTD for six months or less in order to test certain markets, new modes of transit service, etc.

Disparate Impacts for Fare Changes Policy

The Disparate Impact for Fare Changes Policy establishes a threshold for determining whether a changes in fares has a potential Disparate Impact on minority populations.

In the course of performing a Title VI equity analysis for possible Disparate Impact, SAMTD will analyze how the proposed fare change could impact minority populations, as compared to non-minority populations.

Disparate Impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin...

In the event the proposed action has an adverse impact that affects minority populations more than non-minority populations at a level that exceeds the thresholds established in the adopted Disparate Impact Policy, or that restricts the benefits of the service change to protected populations, the finding would be considered as a potential Disparate Impact. Given a potential Disparate Impact, SAMTD will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, SAMTD will take measures to minimize or mitigate the adverse impact of the proposed action.

From the Title VI Circular

The [Disparate Impact] policy shall establish a threshold for determining when adverse effects of fare/service changes are borne disproportionately by minority populations. The Disparate Impact threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by minority populations compared to impacts borne by non-minority populations. The Disparate Impact threshold must be applied uniformly... and cannot be altered until the next Title VI Program submission.

The Disparate Impact for Fare Changes Policy defines measures for determination of potential disparate impact on minority populations resulting from any changes in fares.

Adverse Effects and Disparate Impact Analysis

For fare changes, a potential disparate impact is noted when the percentage of trips by minority riders using a fare option, in combination with the percentage price change for that option, has an impact that exceeds the comparable impact on nonminority riders. Differences in the use of fare options between minority populations and other populations include all such differences that are documented as statistically significant at the 95 percent confidence level.

Avoid, Minimize, Mitigate, or Justify

Upon determination of a disparate impact, SAMTD will either:

- a. Alter the service proposal to avoid, minimize, or mitigate potential disparate impacts, or;
- b. Provide a substantial legitimate justification for keeping the proposal as-is, and show that there are no alternatives that would have a less disparate impact on

minority riders but would still accomplish the project or program goals.

Disproportionate Burden for Fare Changes Policy

The Disproportionate Burden for Fare Change Policy establishes a threshold for determining whether a change in fares has a potential disproportionate burden on low-income populations.

In the course of performing a Title VI equity analysis for possible disproportionate burden, SAMTD will analyze how the proposed fare change could impact low-income populations, as compared to non-low-income populations.

From the Title VI Circular

The [Disproportionate Burden] policy shall establish a threshold for determining when adverse effects of fare/ service changes are borne disproportionately by low-income populations. The disproportionate burden threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by low-income populations as compared to impacts born by non-low-income populations.. The disproportionate burden threshold must be applied uniformly... and cannot be altered until the next [Title VI] program submission....

In the event the proposed action has an adverse impact that affects low-income populations more than non-low-income populations at a level that exceeds the thresholds established in the adopted Disproportionate Burden for Fare Changes Policy, or that restricts the benefits of the fare change to protected populations, the finding would be considered as a potential disproportionate burden. Given a potential disproportionate burden, SAMTD will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, SAMTD will take measures to minimize or mitigate the adverse impact of the proposed action.

The Disproportionate Burden for Fare Changes Policy defines measures for determination of potential disproportionate burden on low-income populations resulting from any changes in fares.

Adverse Effects and Disproportionate Burden Analysis

For fare changes, a potential disproportionate burden is noted when the percentage of trips by low-income riders using a fare option, in combination with the percentage price change for that option, has an impact that exceeds the comparable impact on non-low-income riders. Differences in the use of fare options between low-income populations and other populations include all such differences that are documented as statistically significant at the 95 percent confidence level.

Avoid, Minimize, Mitigate, or Justify

Upon determination of disproportionate burden, SAMTD will either:

- a. Alter the service proposal to avoid, minimize, or mitigate potential disproportionate burdens, or;
- b. Provide a substantial legitimate justification for keeping the proposal as-is, and show that there are no alternatives that would have a less disproportionate burden on low-income riders but would still accomplish the project or program goals.

Public Outreach to Establish Title VI Policies

SAMTD staff engaged two groups representing minority and low-income populations in Marion and Polk Counties in order to determine the appropriate thresholds that define a Major Service Change and the definition of “low-income” populations.

Special Transportation Fund Advisory Committee (STFAC)

The first of the two groups consulted was the SAMTD Board of Directors’ Special Transportation Fund Advisory Committee (STFAC), which makes recommendations on funding and coordination of public transportation services for seniors and people with disabilities. Many of the clients the members represent are low-income individuals who rely on public transportation on a daily basis. Twelve people were present at the meeting held on April 4, 2017.

City of Salem Human Rights and Relations Advisory Commission (HRRAC)

The second group staff presented the thresholds to was the City of Salem Human Rights and Relations Advisory Commission (HRRAC). This group represents people of all races, national origins, sexual orientation, and other human rights categories.⁴

Results of Discussions

Staff presented on the proposed Title VI Equity Analysis thresholds and asked a few questions to each group in order to gain feedback on the thresholds. Sixteen people were present at the meeting held on April 4, 2017.

For Major Service Changes, both groups preferred a lower threshold than the previous rate of 25 percent. Using their feedback as a guide,

⁴ The City of Keizer does not have an equivalent commission or similar group to consult for Title VI-related subjects.

staff determined that a 15 percent threshold would be more appropriate for the region.

Both groups believed the Disparate Impact Analysis and the Disproportionate Burden Analysis thresholds of 7 or 8 percentage points should be lowered as much as possible. Staff determined that a level of 5 percentage points difference between minority and non-minority populations would be more appropriate for the current networks operated by SAMTD.

Additionally, both groups agreed staff's proposal of changing the definition of "low-income population" from those earning 100 percent of the Federal Poverty Level (FPL) or less to those earning 150 percent of FPL or less may not be going far enough. Some suggested the threshold should be 185 percent of FPL or less to align with the Supplemental Nutrition Assistance Program (SNAP) definitions. Staff followed up with more research on how other transit agencies define "low-income populations" and determined most use 100 percent of FPL. Also, staff analyzed which block groups would be considered "low income" versus "higher income" given the three possible thresholds, and found little difference in how block groups would be categorized. As a result, staff decided to maintain our proposed threshold of 150 percent FPL or less.

Part III: Systemwide Service Standards and Policies

In 2011, the SAMTD Board of Directors approved a strategic plan with the following values:

- Safety
- Service Excellence
- Communication
- Innovation
- Accountability

These values are always used when considering service changes and are incorporated into each year's annual service planning process. Beyond these priority considerations, SAMTD has also established standards and policies as set forward in FTA Circular 4702.1B covering:

Standards:

- Service Availability
- Service Frequency
- Vehicle Loads
- On-Time Performance

Policies:

- Amenity Placement
- Vehicle Assignment

These standards and policies assist in guiding the development and delivery of service in support of SAMTD's mission to connect people with places through safe, friendly, and reliable public transportation services. They also provide benchmarks to ensure that service design and operations practices do not result in discrimination on the basis of race, color, or national origin. They establish a basis for monitoring and analysis of service delivery, availability, and the distribution of amenities and vehicles to determine whether or not any disparate impacts or disproportionate burdens are evident.

Service Availability

In the urban area, 75% of revenue hours will be deployed with a focus on increasing ridership, predominantly on high demand corridors. This service will include 15-minute frequency routes, commuter/tripper routes, and limited 30-minute frequency routes which are expected to provide overall high ridership. The remaining 25% of urban revenue hours will be allocated to service which provides needed coverage throughout the community without consideration for expected boardings per revenue hour. This service will predominantly include 60-minute and 30-minute frequency routes. An entire route or individual segments of a route may be classified as either Ridership or Coverage focused.

90% of the residents within the Salem-Keizer UGB should have transit service along a major arterial, minor arterial, or collector serving their residential area; in areas where service can't come within one-half mile of the residential area, a park and ride lot should be available on the route closest to the unserved area.

Service Frequency

Service Day Periods

Distinct route structures and frequencies may be provided during different time periods of the service day. Where possible, route structures should remain consistent between time periods to promote usability and clarity. The service day may contain three separate periods of time:

1. Daytime service - 5:00 a.m. - 7:00 p.m.
2. Evening service - 7:00 p.m. - 11:00 p.m.
3. Night service - 11 p.m. - 5:00 a.m.

Service Day Types

Distinct route structures and frequencies may be provided during

different types of service days. Where possible, route structures should remain consistent to promote usability and clarity. The three types of service days may include: Weekday, Saturday, Sunday or Holiday service.

Consistent Frequency

Transit service will be deployed where it will provide the greatest use to the most people for access to the most activities and jobs. As one of the strongest drivers for high ridership, where possible and practical, route frequency should remain consistent throughout the service day period.

Route Types

SAMTD will maintain four types of routes, generally aligned with the frequency of service provided:

1. **15-minute frequency (4 trips per hour)** - Often referred to as Corridor service, 15-minute frequency routes provide reliable, frequent service along corridors. 15-minute frequency routes should be deployed with an expectation of relative high ridership, above 25 boardings per revenue hour.
2. **30-minute frequency (2 trips per hour)** - Often referred to as Connector service, 30-minute frequency routes provide reliable connectivity to Transit Centers or to 15-minute frequency routes. 30-minute frequency routes should be deployed with an expectation of moderately high ridership, above 20 boardings per revenue hour.
3. **60-minute frequency (1 trip per hour)** - Often referred to as Circulator or Coverage service, 60-minute frequency routes provide service coverage over large areas and provide critical life-line connectivity to many sections of the community. 60-

minute frequency routes should be deployed with an expectation of moderate ridership, above 10 boardings per revenue hour.

4. ***Commuter/Tripper (various)*** - Commuter and tripper routes provide connectivity to a specific, remote location or provide service at particular times when significant travel demand is expected. Commuter/Tripper routes typically have few trips throughout the day. Commuter/Tripper routes should be deployed with an expectation of moderately high ridership, above 20 boardings per revenue hour.

On-Time Performance

90% of buses will arrive no later than four minutes after their scheduled end-of-trip arrival time. 100% of buses will not depart before their scheduled start-of-trip departure time. 90% of buses will depart within four minutes of their scheduled start-of-trip departure time.

The number of missed trips will be less than 0.5% of total scheduled trips. Road calls will occur less frequently than every 4,000 vehicle miles.

Vehicle Loads

SAMTD will assign a sufficient sized vehicle, or frequency of vehicles, to routes in a manner that will minimize overcrowding of buses through all portions of the SAMTD service area.

Additional service will be considered when load levels routinely exceed 1.5 times the seated capacity of the vehicle for local fixed routes and 1.0 times the seated capacity for regional express routes. Additional service will be considered when customers must routinely stand longer than 20 minutes on an individual trip.

Table III-1. Vehicle Capacities and Maximum Load Factor

Vehicle Type	Passenger Capacities			
	Seated	Standing	Maximum Capacity	Maximum Load Factor
35-ft high floor	35	0	35	1.0
35-ft. low floor	32	16	48	1.5
40-ft. low floor	39	19	57	1.5
40-ft. commuter	37	0	37	1.0

Transit operators are required to radio dispatch if they have a full load and must pass up anyone. SAMTD considers a full bus to have a load factor of 1.5 for local fixed route service and 1.0 for regional express service. This load standard does not apply to special event service or shuttles.

Amenity Placement

To the extent permitted by the topography and physical conditions on a route, transit amenities such as bus shelters, stop frequency, park and ride lots and facilities, and information displays will be equally distributed among all of the transit routes and across all areas of the SAMTD service area.

Bus stops shall be between 0.2 and 0.25 miles apart on all routes, to the extent allowed by physical circumstances; shelters shall be placed at stops based on the number of boarding's, with a goal of placing shelters at all stops in the system that serve 20 or more riders per day or more than 8 riders at one time (recognizing that some stops have physical or legal limitations that will not allow shelter placement).

Vehicle Assignment

To the extent permitted by physical conditions and certain specific operating conditions on the routes, vehicles will be assigned randomly to routes for the purpose of equitably balancing the age, amenities, and condition of the vehicles amongst all riders in the SAMTD service area.

Each bid period, SAMTD will develop an assignment of buses that rotates all vehicles, regardless of age or amenities, between routes.

SAMTD uses two criteria for placing buses on routes, mileage of the buses and ridership of a given route. In order to maintain approximately equal odometer readings on all of the vehicles based on their ages, the vehicles are placed in high or low usage routes accordingly.

In addition, SAMTD operates two commuter type buses for its 1X regional express service to Wilsonville. These buses have commuter style seats and luggage racks. Ridership demand dictates the size of the bus to be used. Age or type of bus or any other factor has no relevance in the assignment.

Additional criteria may influence vehicle assignment from time to time, such as rotation required by SAMTD's advertising contract or other service provision contracts.

Part IV: Service Monitoring

Part of SAMTD's compliance with FTA Circular 4702.1B is ongoing performance monitoring. This monitoring is meant to ensure that SAMTD is providing service in a way that does not discriminate on the basis of race, color, or national origin.

Specifically SAMTD monitors the following service and performance metrics:

1. Minority and Non-Minority Routes
2. Service Availability
3. Service Frequency and Span
4. On-Time Performance
5. Vehicle Loads
6. Stop Amenities
7. Vehicle Assignment

Minority and Non-Minority Routes

"Minority" routes, as defined by the FTA, are routes that provide at least one third of their service (measured by revenue hours) in block groups that are above-average minority population. "Non-minority" routes are all others.

Currently SAMTD operates a total of 29 routes. Of these, 21 routes are considered minority routes. The remaining 8 routes are considered non-minority routes. As of May 2017, minority routes account for 77 percent of SAMTD system service (measured by revenue hours). SAMTD generally aligns service with mobility needs and ridership, thus routes serving areas with above average minority populations typically have higher ridership and therefore a higher overall level of service than non-minority routes.

Service Availability

SAMTD considers persons residing within one-half mile of bus stops as having service available. Service availability is expressed as a number and percentage of the population of Marion and Polk Counties.

Table IV-1. Availability of Service

	Marion and Polk Counties	Number and Percentage within One-half Mile Walk of Bus	
<i>Minorities</i>	122,365	113,438	92.7%
<i>Non-Minorities</i>	278,158	241,340	86.8%
<i>All</i>	400,523	354,778	88.6%

Findings

The percent of minority population with service available exceeds that of the non-minority population, 93% to 87%. Thus, there are no disparate impacts to the minority population in regard to availability of service.

Service Frequency and Span

The analysis of service frequency and span is by type of service. Table IV-2 presents the frequency and span for each route. Tables IV-3 and IV-4 compare the frequency and span for minority routes and non-minority routes by type of service.

Table IV-2. Headways and Span of Service by Route (Minority Routes Shown in Bold with Shaded Backgrounds)

Route	Route Name	Average Headway				Service Start	Service End	Span (Hrs)
		AM	Mid	PM	Eve			
1X	Wilsonville / Salem Express*	13 daily round trips				5:00 AM	7:52 PM	9.08
2	Market / Brown	15	15	15	30	5:55 AM	9:22 PM	15.45
2X	Grand Ronde / Salem Exp.	8 daily round trips				6:30 AM	12:15 AM	17.75
3	Portland Road	30	30	30	30	5:57 AM	9:27 PM	15.50
4	State Street	60	60	60	60	6:05 AM	9:23 PM	15.30
5	Center Street	15	15	15	30	5:52 AM	9:17 PM	15.42
6	Mission / Fairview Ind.	60	60	60	60	5:30 AM	9:39 PM	16.15
7	Mission / Hawthorne	60	60	60	60	5:43 AM	9:20 PM	15.62
8	12th / Liberty via Red Leaf	60	60	60	60	5:41 AM	9:31 PM	15.83
9	Cherry / River Road	30	30	30	30	5:40 AM	9:34 PM	15.90
10X	Woodburn/Salem Express	6 daily round trips				6:30 AM	8:19 PM	13.82
11	Lancaster / Hyacinth	15	15	15	30	5:43 AM	9:38 PM	15.92
12	Hayesville	60	60	60	60	6:30 AM	9:19 PM	14.82
13	Silverton Road	30	30	30	60	5:32 AM	9:02 PM	15.50
14	Windsor Island	30	30	30	30	6:00 AM	9:22 PM	15.37
15X	Airport Rd. Park & Ride Exp.	15	30	15	30	6:15 AM	8:23 PM	14.13
16	Wallace Road	60	60	60	60	5:40 AM	9:38 PM	15.97
17	Edgewater / Gerth	30	30	30	60	5:37 AM	9:20 PM	15.72
18	12th / Liberty via Lone Oak	60	60	60	60	6:10 AM	9:47 PM	15.62
19	Broadway / River Road	15	15	15	30	5:54 AM	9:19 PM	15.42
20X	N. Marion Co. / Salem Exp.	5 daily round trips				6:16 AM	7:50 PM	13.57
21	South Commercial	15	15	15	30	5:57 AM	9:22 PM	15.42
22	Library Loop	30	30	30	30	5:53 AM	9:05 PM	15.12
23	Lansing/Hawthorne	60	60	60	60	6:25 AM	9:20 PM	14.92
24	State/Lancaster	60	60	60	60	5:37 AM	8:53 PM	15.27
30X	Santiam / Salem Express	4 daily round trips				5:41 AM	7:08 PM	13.48
40X	Polk County / Salem Express	6 daily round trips				5:50 AM	9:32 PM	15.70
50X	Dallas / Salem Express	2 daily round trips				6:12 AM	5:37 PM	2.77
91	Garten	1 daily round trip				N/A	N/A	0.67
92	Rockwest	1 daily round trip				N/A	N/A	0.53

* Includes five round trips operated by SAMTD and eight operated by SMART

Table IV-3. Comparison of Headways and Span of Service for Minority and Non-Minority Local Fixed Routes

Route Type	Route Classification	Average Headway				Average Service Start	Average Service End	Average Span (Hrs)
		AM	Mid	PM	Eve			
Local Fixed Route	<i>Minority Routes</i>	37.9	38.8	37.9	45.9	5:56 AM	9:11 PM	15.25
	<i>Non-Minority Routes</i>	41.3	41.3	41.3	45.0	5:55 AM	9:26 PM	15.50
	<i>All Routes</i>	38.6	39.3	38.6	45.7	5:53 AM	9:20 PM	15.29

Table IV-4. Comparison of Headways and Span of Service for Minority and Non-Minority Regional Express Routes

Route Type	Route Classification	Average Daily Round Trips	Average Service Start	Average Service End	Average Span (Hrs)
Regional Express Route	<i>Minority Routes</i>	5.50	6:23 AM	8:04 PM	13.70
	<i>Non-Minority Routes</i>	5.83	5:50 AM	8:28 PM	11.76
	<i>All Routes</i>	5.75	5:59 AM	7:43 PM	12.31

Findings

- For local fixed route service, minority routes have smaller headways (serve stops more frequently) than service on non-minority routes. The only exception is during the evening time band, when the average headway for minority routes is about a minute longer than that of non-minority routes. However, there is a difference of only two percent. This difference is less than the systemwide disparate impact threshold of 20 percent.
- For local fixed route services, the span of service is slightly greater for non-minority routes than minority routes (15.5 hours and 15.2 hours, respectively). This is a 1.6 percent difference, which is less than the systemwide disparate impact threshold of 20 percent.

- For regional express service, non-minority routes have a slightly greater number of average daily round trips than the minority routes (5.7%). This difference is less than the systemwide disparate impact threshold of 20 percent.
- For regional express service, the average span of service on minority routes is about 2.1 hours longer than that of non-minority routes. Note that the average start of service on non-minority routes is before that of minority routes, and the end of service on non-minority routes is after that of minority routes. The reason for the discrepancy between the average span and the start and end times is because of how SAMTD calculates span of service. SAMTD does not include the middle of the day in the calculation for Routes 1X and 50X because the routes are only serving riders in the AM and PM peaks.

Thus, there are no disparate impacts to minority populations in regard to frequency or span.

On-Time Performance

SAMTD currently does not have Computer Aided Dispatch – Automatic Vehicle Location (CAD-AVL) equipment on any of the buses, which would continually monitor on-time performance for every time point. For this evaluation, staff recorded the on-time performance at the end of most routes for three days of service in March and April 2017. Buses were considered to be “on time” if they arrived up to four minutes later than their scheduled arrival time. Average on-time performance is weighted by revenue hours by route.

Table IV-5. On-Time Performance by Route (March and April 2017)
(Minority Routes Shown in Bold with Shaded Backgrounds)

Route	Route Name	Percent of Trips On Time				
		AM	Mid	PM	Eve	Overall
1X	Wilsonville / Salem Express*	88%	—	80%	—	83%
2	Market / Brown	83%	95%	73%	100%	84%
3	Portland Road	100%	93%	76%	100%	90%
4	State Street	89%	100%	100%	100%	98%
5	Center Street	100%	98%	92%	100%	96%
6	Mission / Fairview Ind.	100%	100%	93%	100%	96%
7	Mission / Hawthorne	100%	93%	40%	100%	78%
8	12th / Liberty via Red Leaf	100%	100%	60%	100%	87%
9	Cherry / River Road	76%	93%	63%	100%	80%
11	Lancaster / Hyacinth	75%	82%	78%	67%	78%
12	Hayesville	100%	100%	100%	100%	100%
13	Silverton Road	100%	100%	73%	100%	91%
14	Windsor Island	100%	97%	87%	89%	93%
16	Wallace Road	82%	100%	100%	100%	96%
17	Edgewater/ Gerth	88%	94%	95%	100%	93%
18	12th / Liberty via Lone Oak	89%	100%	80%	100%	91%
19	Broadway / River Road	100%	98%	88%	89%	95%
21	South Commercial	100%	87%	93%	100%	93%
22	Library Loop	100%	90%	80%	80%	90%
23	Lansing/Hawthorne	100%	100%	33%	100%	78%
24	State/Lancaster	100%	80%	80%	100%	87%

Table IV-6. Comparison of On-Time Performance for Cherrriots Local Minority and Non-Minority Routes

Route Classification	Average Percent of Trips on Time				
	AM	Mid	PM	Eve	Overall
<i>Minority Routes</i>	91%	94%	81%	93%	88%
<i>Non-Minority Routes</i>	98%	93%	82%	98%	91%
<i>All Routes</i>	92%	93%	81%	94%	89%

Findings

On-time performance for minority routes on average is 88%, slightly lower than that of non-minority routes, which is 91%. There is a three percent difference between the on-time performance of minority routes and non-minority routes, which is less than the systemwide disparate impact threshold of 20 percent. Thus, there are no disparate impacts to minority populations in regards to on-time performance.

Vehicle Loads

Vehicle loads are examined to determine whether buses are overcrowded. Table IV-7 shows vehicle capacities.

Table IV-7. Vehicle Capacities and Maximum Load Factor

Vehicle Type	Passenger Capacities			
	Seated	Standing	Maximum Capacity	Maximum Load Factor
35-ft high floor	35	0	35	1.0
35-ft. low floor	32	16	48	1.5
40-ft. low floor	39	19	57	1.5
40-ft. commuter	37	0	37	1.0

Tables IV-8 and IV-9 compare average vehicle loads for minority and non-minority routes. Data was collected by automatic passenger counters from January through March 2017. Average maximum load factor, defined by the average load to seated capacity ratio, is weighted by revenue hours by route.

Table IV-8. Vehicle Loads and Maximum Load Factors by Route
(Minority Routes Shown in Bold with Shaded Backgrounds)

Route	Route Name	Bus Type	Average Max Load	Average Max Load Factor
1X	Wilsonville / Salem Express*	40' commuter	23	0.62
2	Market / Brown	35' low floor	20	0.42
2X	Grand Ronde / Salem Exp.	35' low floor	12	0.25
3	Portland Road	40' low floor	23	0.40
4	State Street	40' low floor	27	0.47
5	Center Street	35' low floor	20	0.42
6	Mission / Fairview Ind.	35' low floor	21	0.44
7	Mission / Hawthorne	35' low floor	12	0.25
8	12th / Liberty via Red Leaf	35' low floor	19	0.40
9	Cherry / River Road	35' low floor	12	0.25
11	Lancaster / Hyacinth	40' low floor	22	0.39
12	Hayesville	35' low floor	10	0.21
13	Silverton Road	40' low floor	13	0.23
14	Windsor Island	35' low floor	4	0.08
15X	Airport Rd Park & Ride Exp.	35' low floor	8	0.17
16	Wallace Road	35' low floor	10	0.21
17	Edgewater/ Gerth	35' low floor	10	0.21
18	12th / Liberty via Lone Oak	35' low floor	22	0.46
19	Broadway / River Road	40' low floor	18	0.32
21	South Commercial	40' low floor	25	0.44
22	Library Loop	40' low floor	4	0.07
23	Lansing/Hawthorne	35' low floor	7	0.15
24	State/Lancaster	40' low floor	15	0.26
91	Garten	35' low floor	8	0.17
92	Rockwest	35' low floor	8	0.17

Table IV-9. Comparison of Average Vehicle Loads for Minority and Non-Minority Routes, Local and Regional Express Services

Route Classification	Local Fixed Routes		Regional Express Routes	
	Average Max Load	Average Max Load Factor	Average Max Load	Average Max Load Factor
<i>Minority Routes</i>	14.1	0.27	N/A	N/A
<i>Non-Minority Routes</i>	17.5	0.34	17.5	0.44
<i>All Routes</i>	14.7	0.29	17.5	0.44

Findings

- On local fixed routes, average max load factor for minority routes is 0.27, less than that of non-minority routes (0.34). Both are far less than the standard of 1.5.
- The average max load for regional express routes is 0.44, which is less than the standard of 1.0. Currently SAMTD only has load data for Routes 1X and 2X, both of which are non-minority routes. No data has been collected on Routes 10X-50X because they just went into service on May 8, 2017. In future analyses, SAMTD will be able to report on the differences in average max load factors for minority routes and non-minority routes on our regional express service.

Thus, there is no disparate impact to minority populations in regard to vehicle loads.

Stop Amenities

SAMTD analyzed the distribution of stop amenities in order to identify potential disparities. Table IV-10 shows the share of each amenity in block groups with higher-than-regional-average rates of minorities.

Table IV-10. Distribution of Amenities

Amenity	Total in Service Area	Located In Minority Block Groups	
		Count	Percent
Signs, Maps, and Schedules	774	346	45%
Shelters	124	62	50%
Seating	130	65	50%
Waste Receptacles	169	86	51%

Findings

- Just over half of SAMTD's shelters, seating, and waste receptacles are located in minority block groups.
- Only 45% of signs, maps, and schedules are located in minority block groups.

Although only 45% of signs, maps, and schedules are located in minority block groups, this is simply a function of the placement of stops, every one of which has a sign. There are more bus stops located in non-minority block groups, but that is not a function of the level of service in those areas.

Thus, there is no disparate impact on the minority population in regard to the distribution of amenities.

Vehicle Assignment

In regard to assessing the results of SAMTD's vehicle assignment practices in the context of Title VI, the expectation is that the average age of vehicles on minority routes should not be more than the average age of vehicles on non-minority routes. The average age is calculated by weighing the age of the vehicles by the number of hours in service.

Findings

The average age of vehicles on minority bus routes is 9.9 years, 8% newer than the vehicles on non-minority bus routes (10.8 years).

Thus, there are no disparate impacts on the minority population in regard to vehicle assignment.

Summary

SAMTD finds no disparities in terms of performance standards that would indicate lesser service provision to minority riders or populations. Across nearly every metric minority routes actually perform better than the non-minority routes, and minority populations have better access to the Cherriots system based on residential proximity to service.

Part V: Demographic Analysis

SAMTD uses demographic data to assess equity in distribution of services, facilities, and amenities in relation to minority, low-income, and limited English proficient populations. Such data informs SAMTD in the early stages of service, facilities, and programs planning and enables SAMTD to monitor ongoing service performance, analyze the impacts of policies and programs on these populations, and take appropriate measures to avoid or mitigate potential disparities SAMTD develops maps and comparative charts to perform this analysis, relying on both ridership and population data within the service area.

The demographic data shown in this report are from the following sources:

- 2011-2015 American Community Survey (ACS)
- 2016 Cherriots On-Board Rider Survey

This section includes the following items:

1. Service and Service Area
2. Service Availability
3. Minority Population
4. Low-Income Population
5. Limited English Proficient (LEP) Population
6. Facilities
7. Amenities – Signs, Maps, and Schedules
8. Amenities – Shelters
9. Amenities – Seating
10. Amenities – Waste Receptacles
11. Ridership Characteristics and Demographics

Service and Service Area

The service and service area maps (Figures V-1 and V-2) show all Cherriots bus routes, differentiated by:

- **Frequent Service** – local fixed-route service that runs every 15 minutes or better during peak times
- **Standard Service** – local fixed-route services that runs every 30 or 60 minutes throughout the day
- **Regional Express Service** – express service that connects communities throughout the region

Figure V-1. Service and Service Area (Marion and Polk Counties)

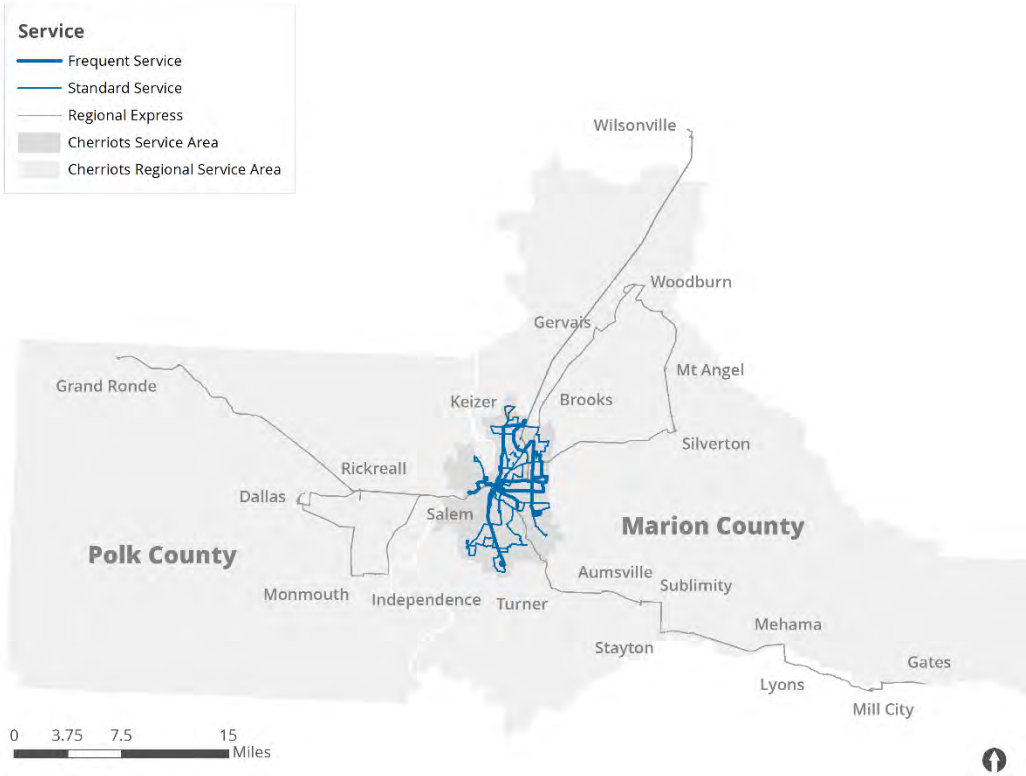
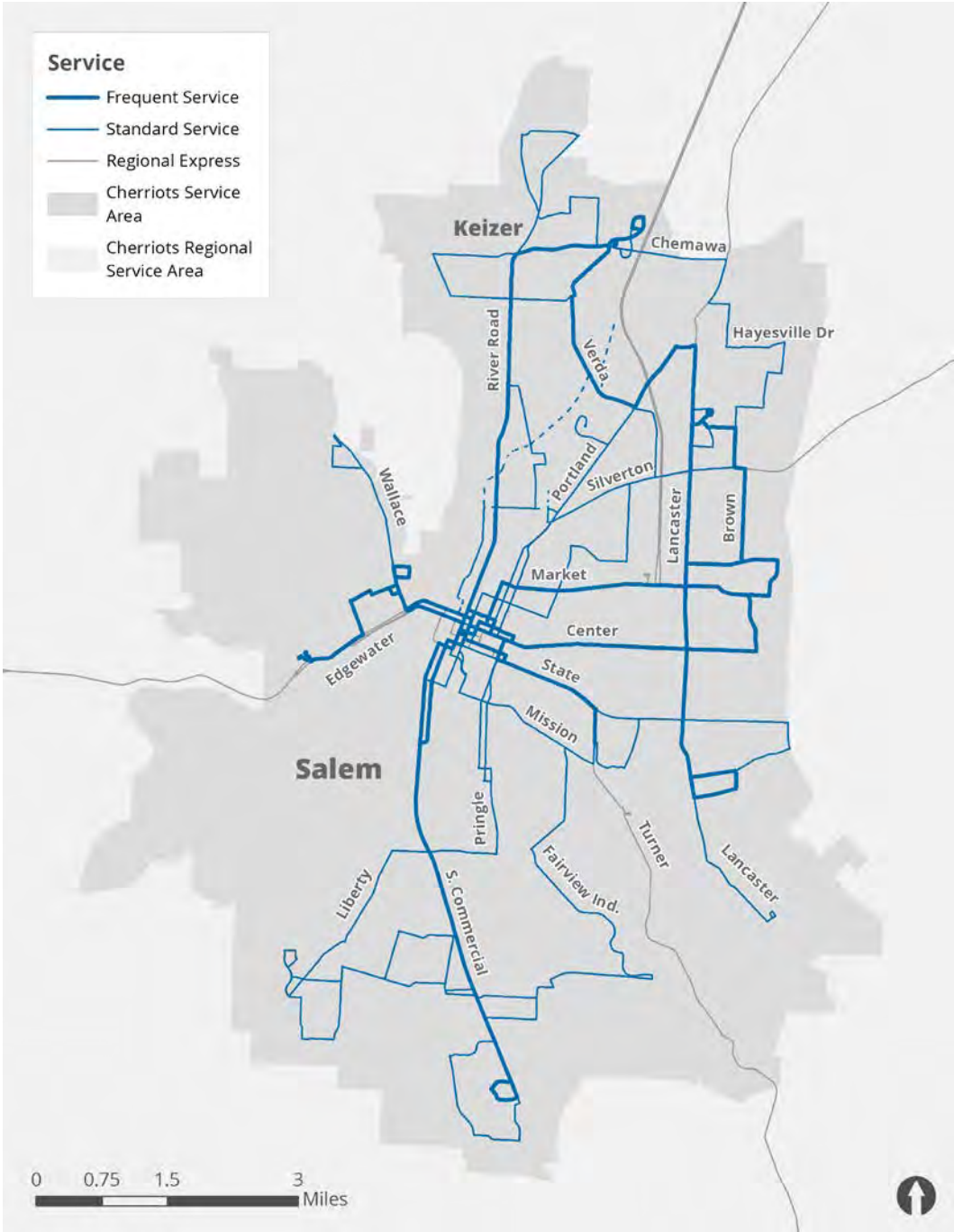


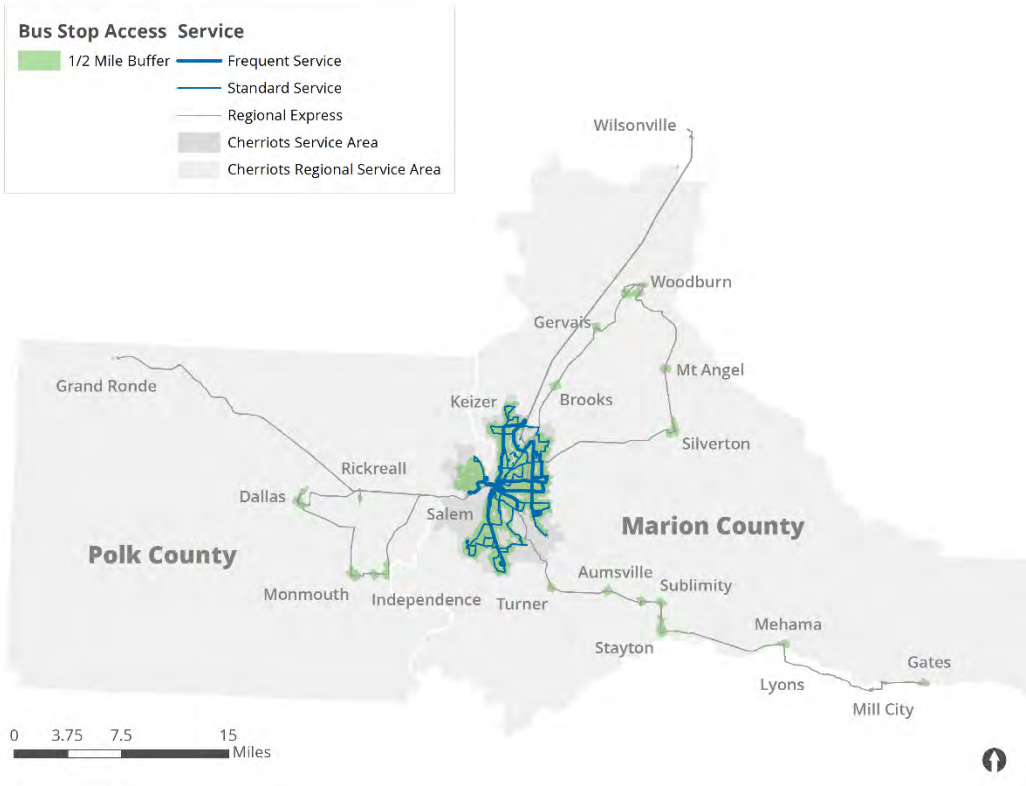
Figure V-2. Service and Service Area (Salem and Keizer)



Service Availability

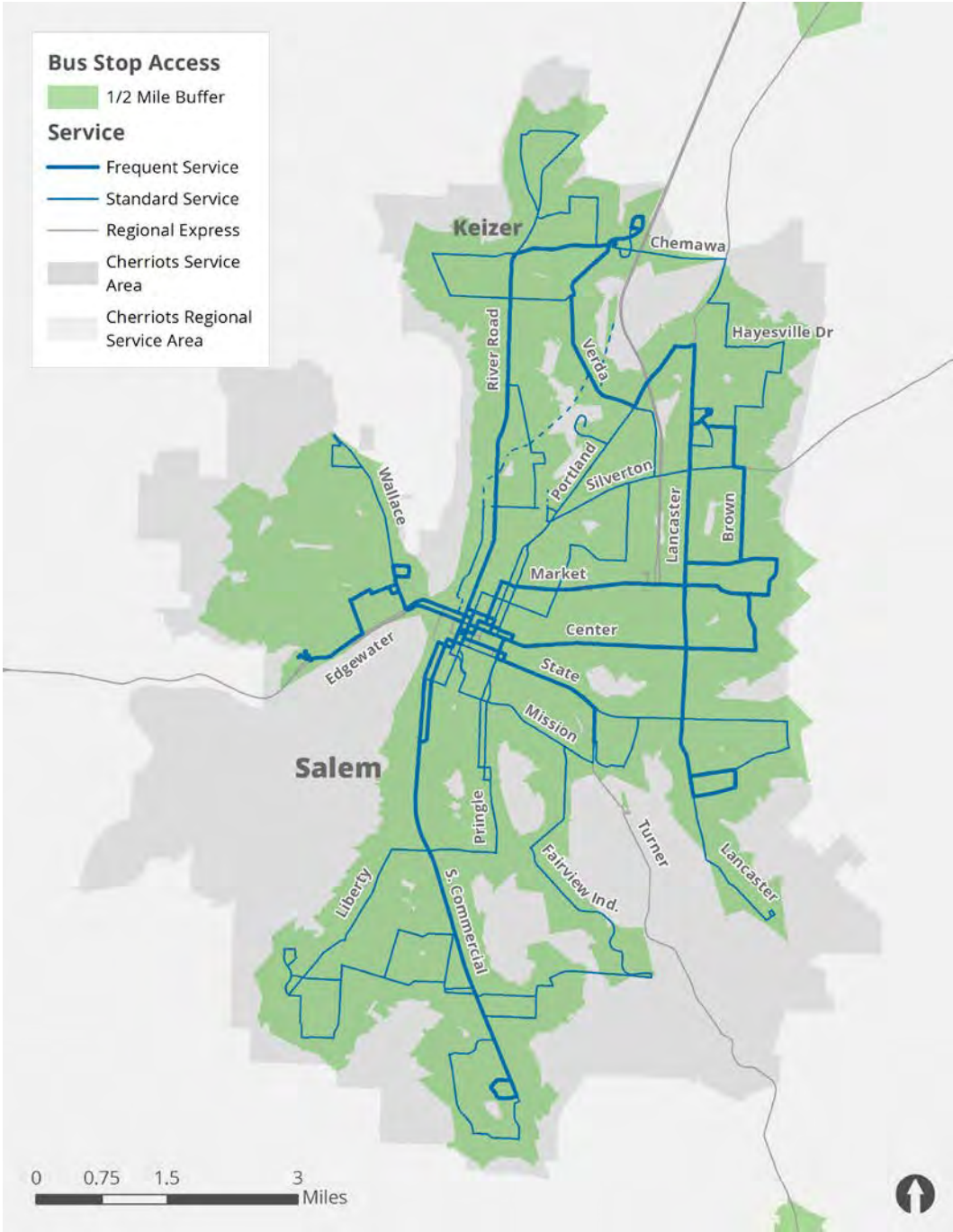
Figures V-3 and V-4 below display areas in Marion and Polk Counties that are within a half mile of a bus stop, which are the places SAMTD considers served. For this purposes of this analysis, pickup and drop-off points for the West Salem Connector were treated like bus stops.

Figure V-3. Areas within a Half Mile of a Bus Stop (Marion and Polk Counties)



Source: ACS 2011-15, Table B16002

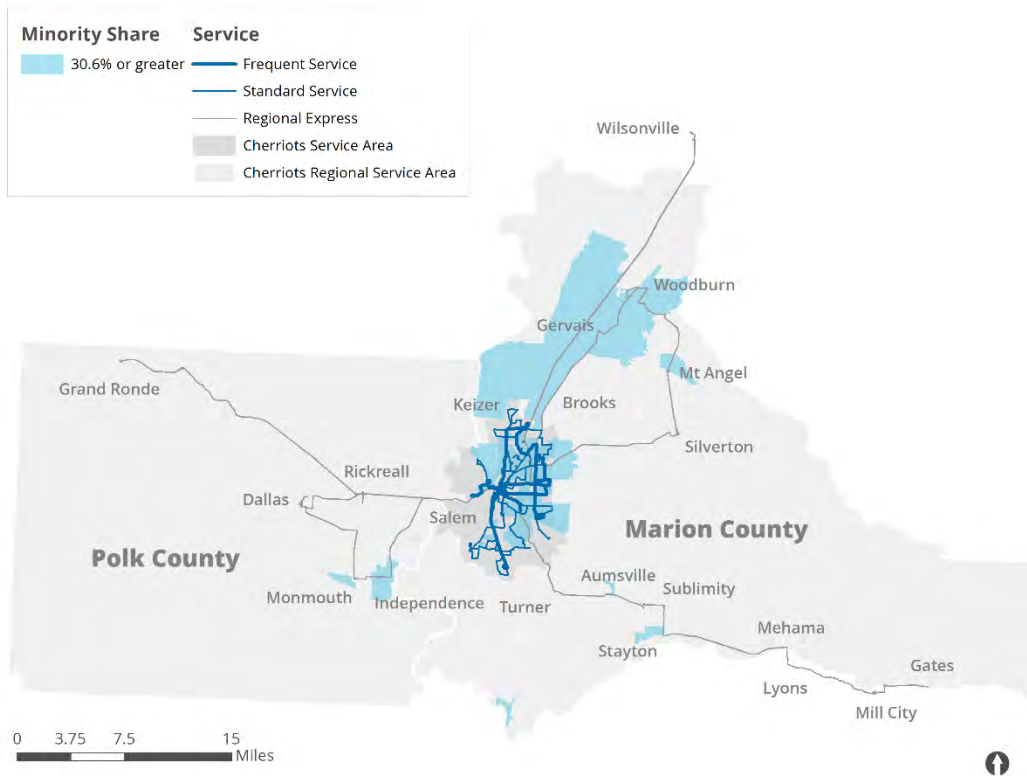
Figure V-4. Areas within a Half Mile of a Bus Stop (Salem and Keizer)



Minority Population

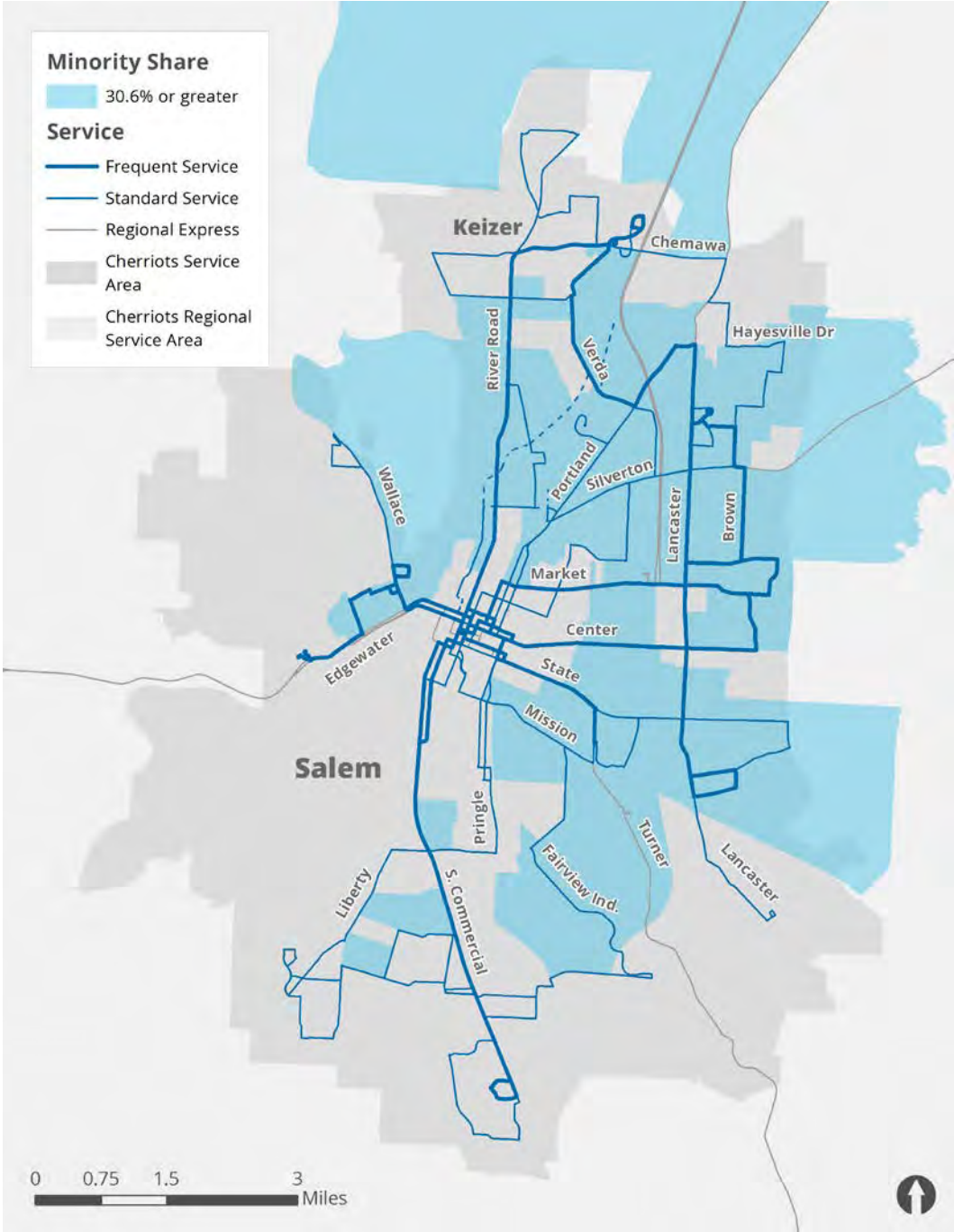
Figures V-5 and V-6 below display U.S. Census Block Groups in Marion and Polk Counties that have shares of minority populations greater than the average for the two counties (30.6%) as of the 2011-2015 ACS.

Figure V-5. Service and Service Area with Minority Population (Marion and Polk Counties)



Source: ACS 2011-15, Table B03002

Figure V-6. Service and Service Area with Minority Population (Salem and Keizer)

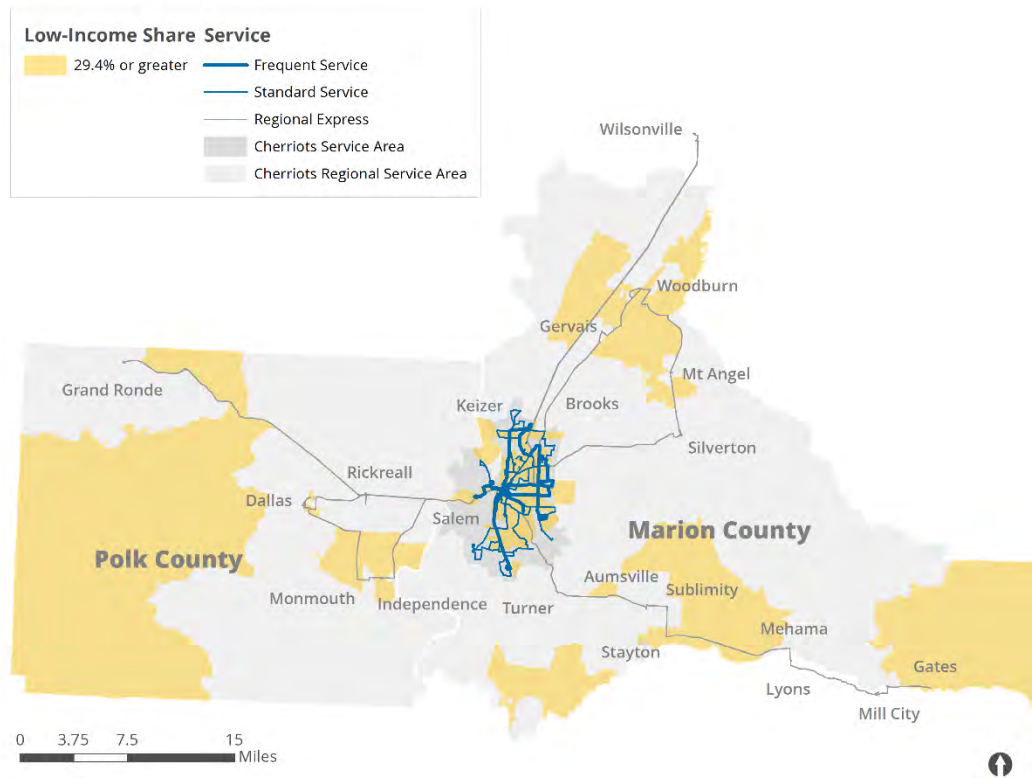


Source: ACS 2011-15, Table B03002

Low-Income Population

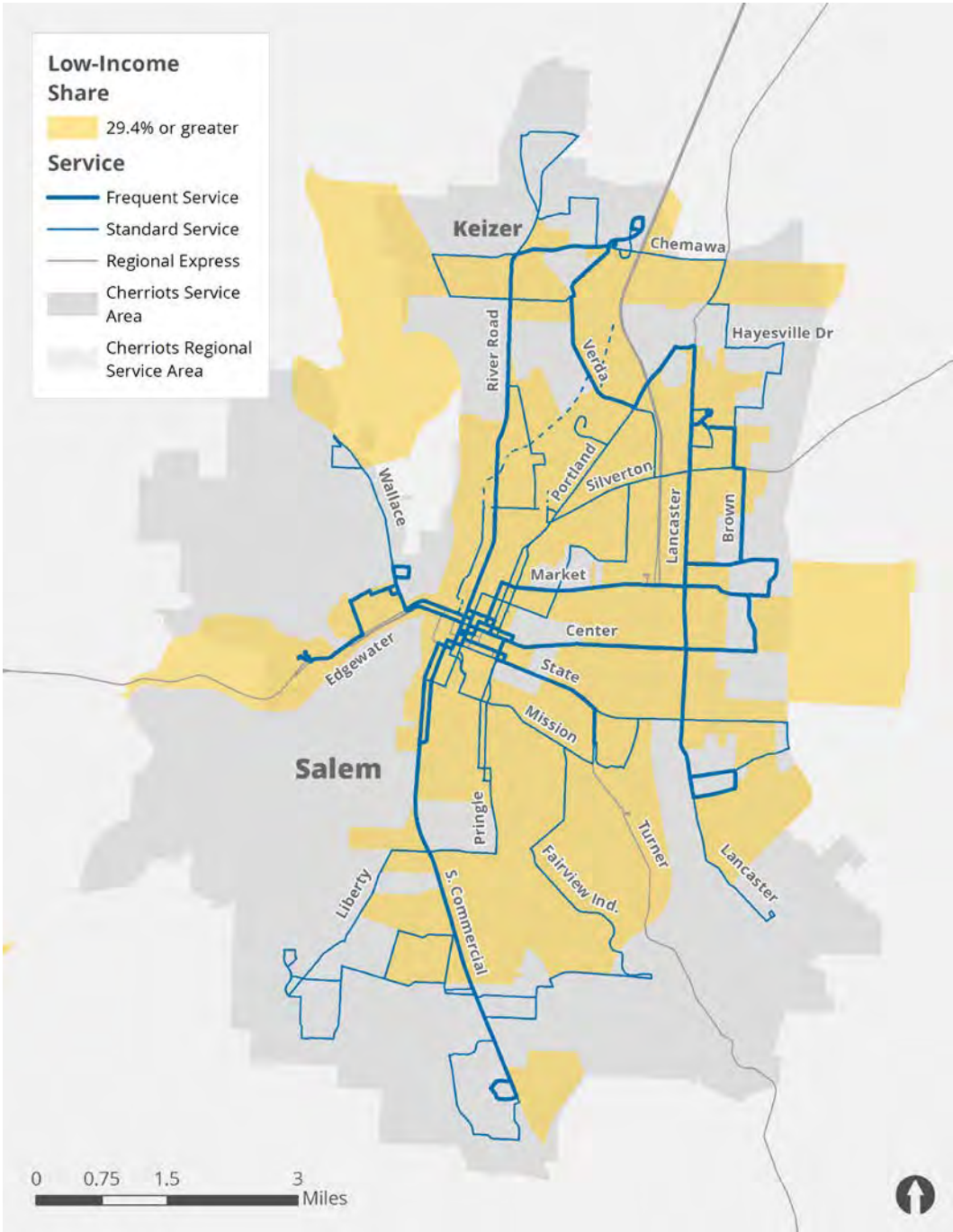
Figures V-7 and V-8 below display U.S. Census Block Groups in Marion and Polk Counties that have shares of low-income populations greater than the average for the two counties (29.4%) as of the 2011-2015 ACS. Low-income is defined as those earning at or below 150% of the federal poverty level.

Figure V-7. Service and Service Area with Low-Income (150% Federal Poverty Level) Population (Marion and Polk Counties)



Source: ACS 2011-15, Table C17002

Figure V-8. Service and Service Area with Low-Income (150% Federal Poverty Level) Population (Salem and Keizer)

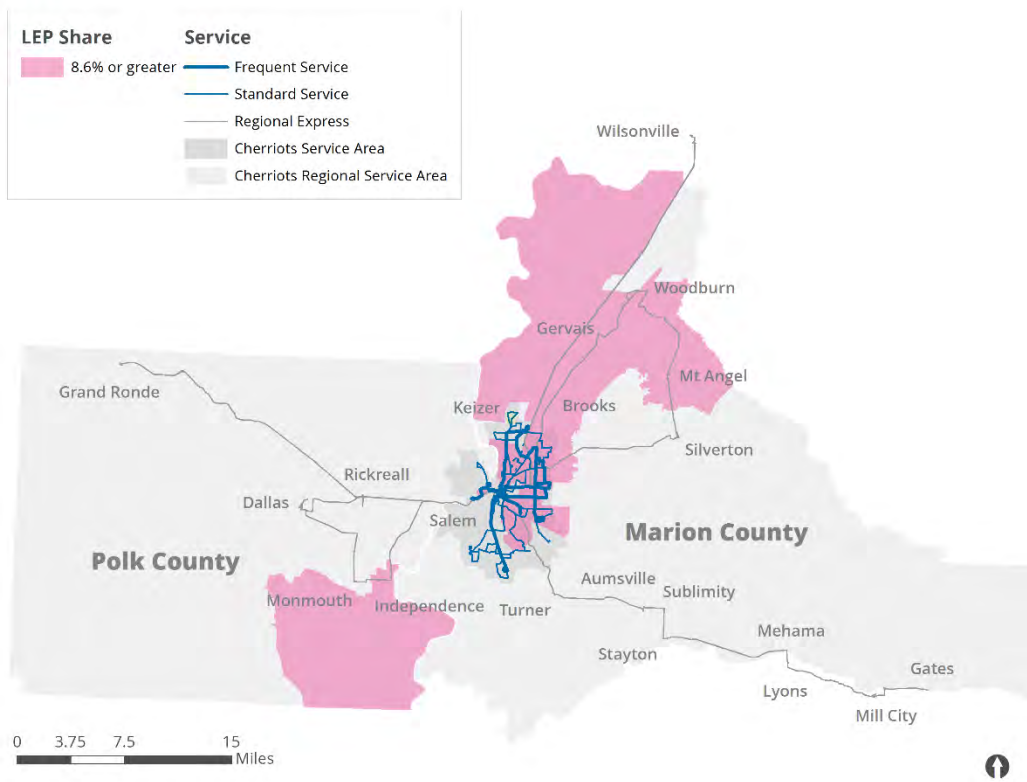


Source: ACS 2011-15, Table C17002

Limited English Proficient (LEP) Population

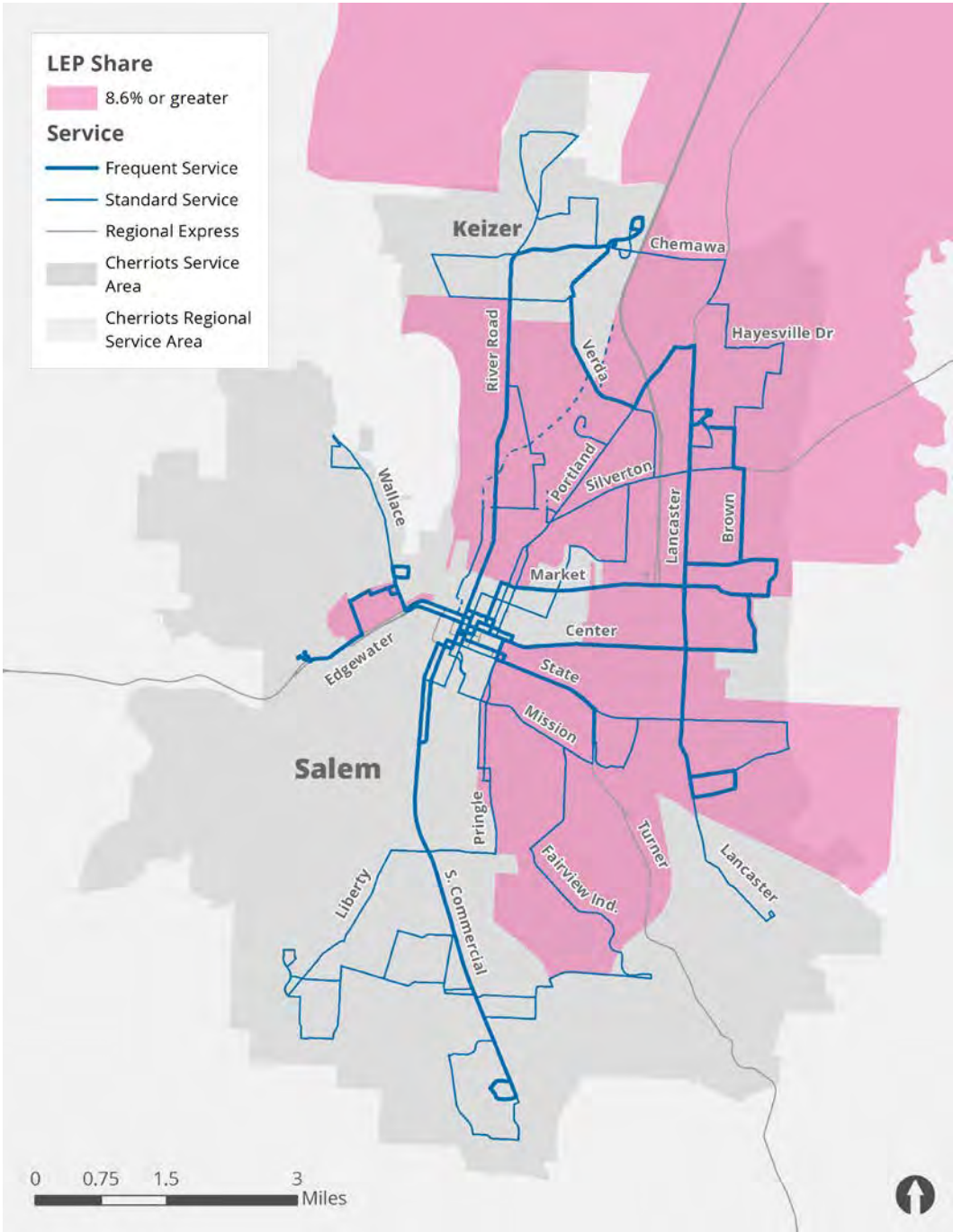
Figures V-9 and V-10 below display U.S. Census Block Groups in Marion and Polk Counties that have shares of Limited English Proficient populations greater than the average for the two counties (8.6%) as of the 2011-2015 ACS. LEP is defined as those who speak English less than “very well”.

Figure V-9. Service and Service Area with Limited English Proficiency (LEP) Population (Marion and Polk Counties)



Source: ACS 2011-15, Table B16002

Figure V-10. Service and Service Area with Limited English Proficiency (LEP) Population (Salem and Keizer)

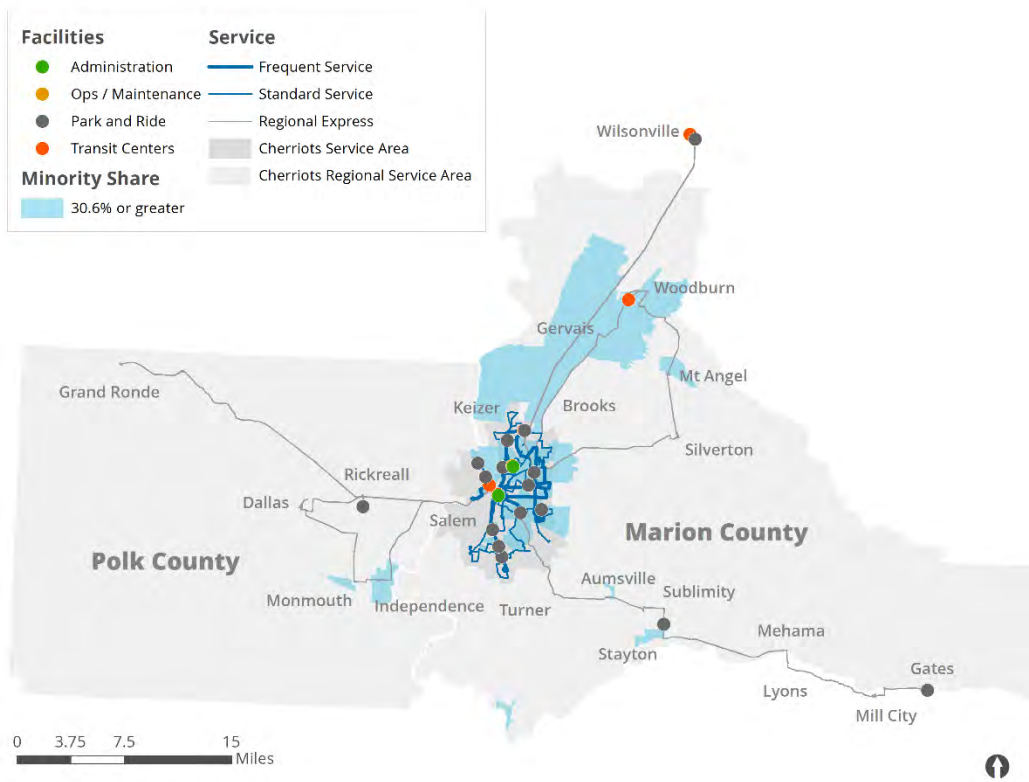


Source: ACS 2011-15, Table B16002

Facilities

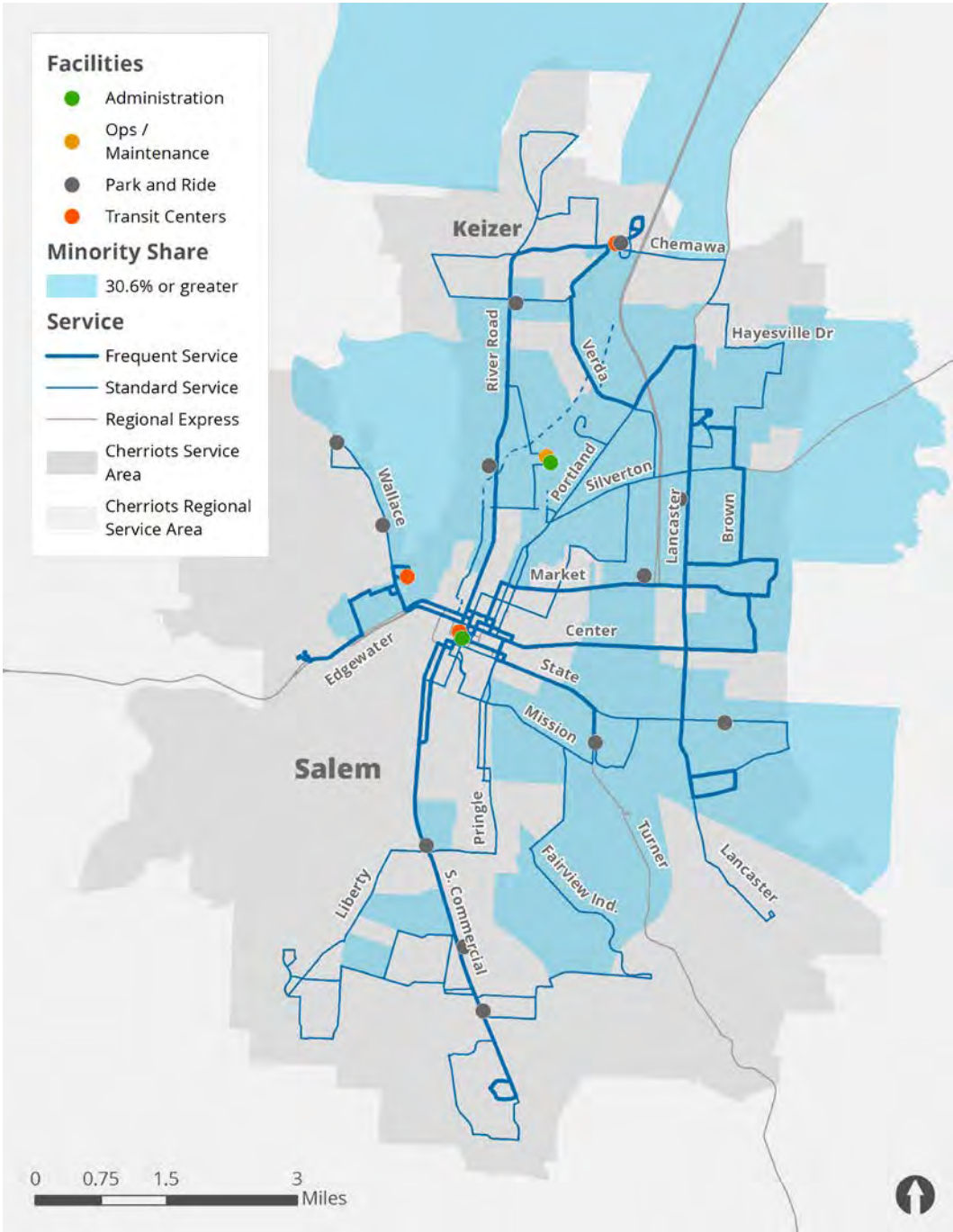
Figures V-11 through V-14 below display SAMTD facilities, including administrative offices, operations and maintenance facilities, park and rides, and transit centers. Overlays include minority populations and low-income populations.

Figure V-11. Current SAMTD Facilities with Minority Population (Marion and Polk Counties)



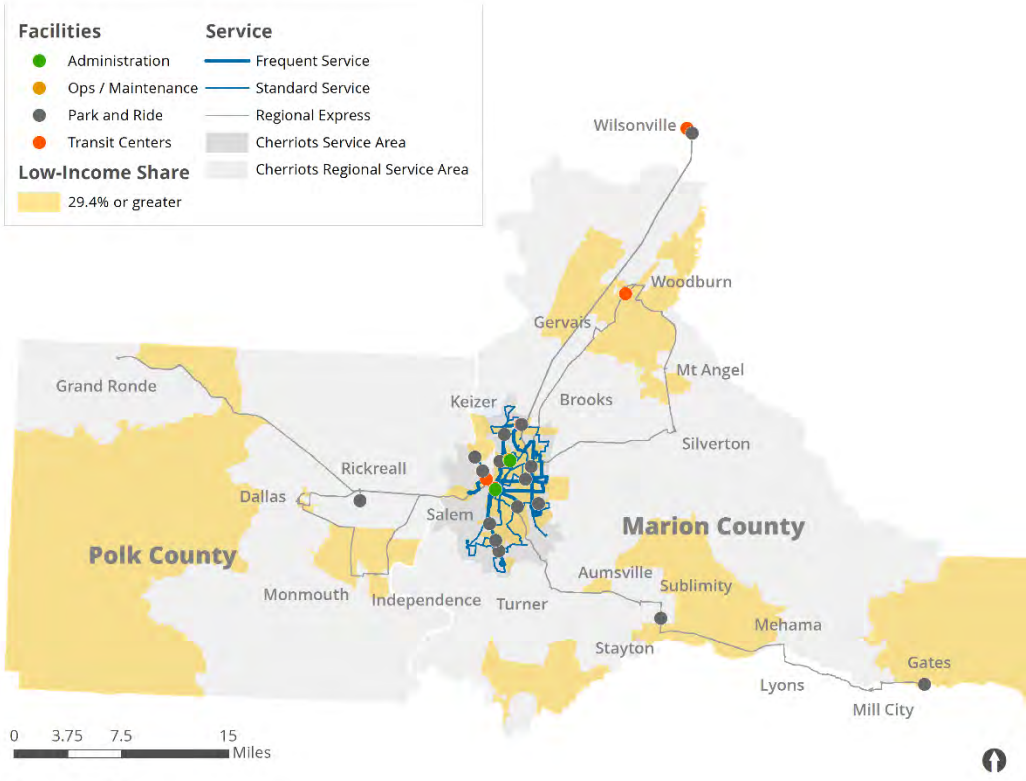
Source: ACS 2011-15, Table B03002

Figure V-12. Current SAMTD Facilities with Minority Population (Salem and Keizer)



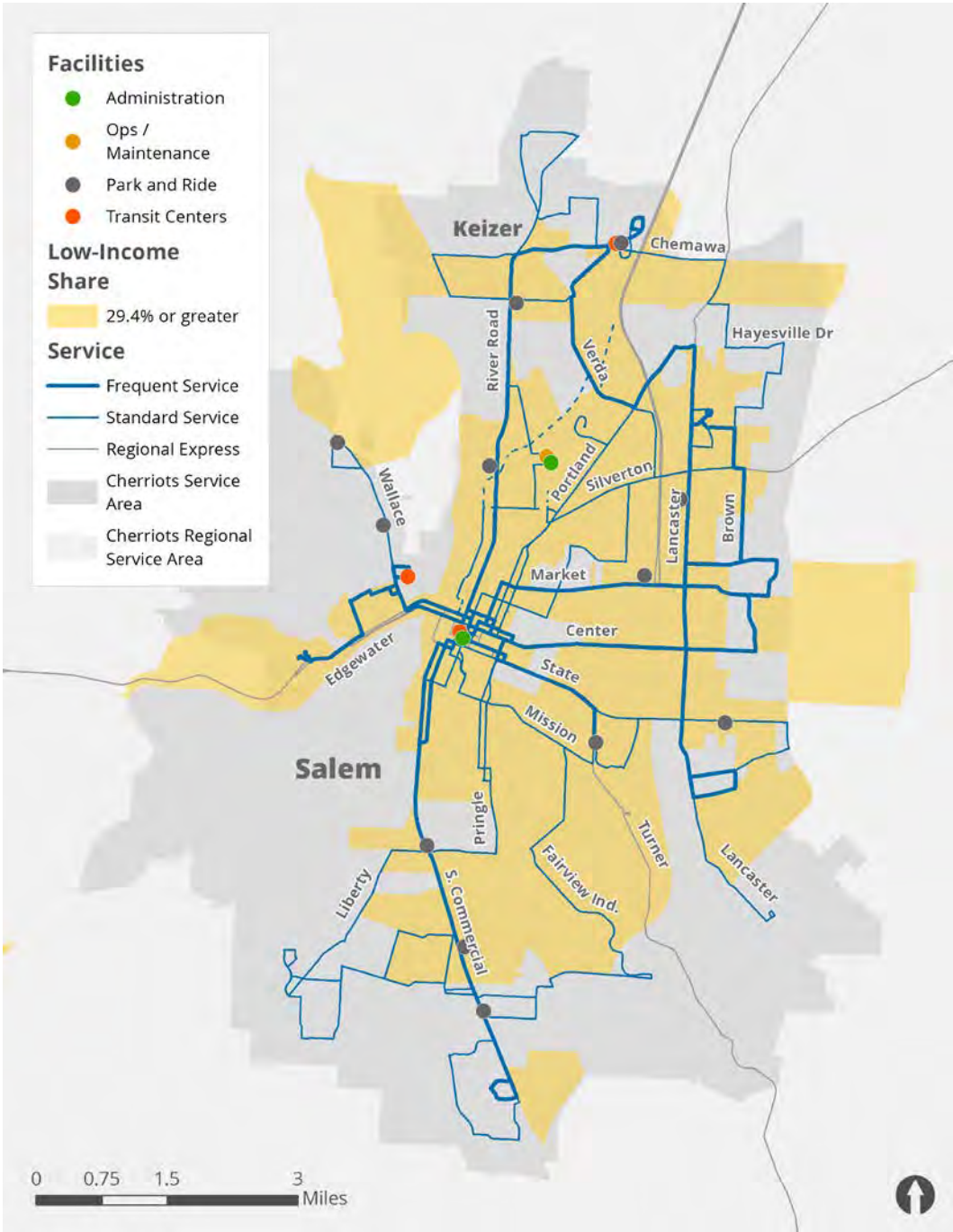
Source: ACS 2011-15, Table B03002

Figure V-13. Current SAMTD Facilities with Low-Income (150% Federal Poverty Level) Population (Marion and Polk Counties)



Source: ACS 2011-15, Table C17002

Figure V-14. Current SAMTD Facilities with Low-Income (150% Federal Poverty Level) Population (Salem and Keizer)

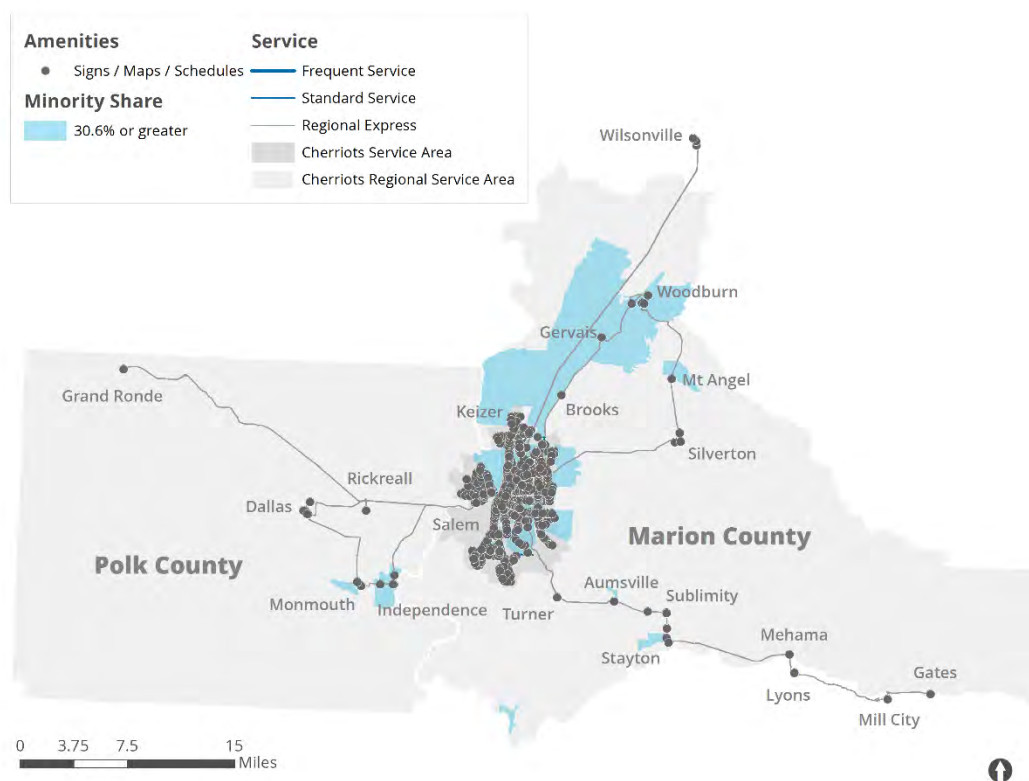


Source: ACS 2011-15, Table C17002

Amenities – Signs, Maps, and Schedules

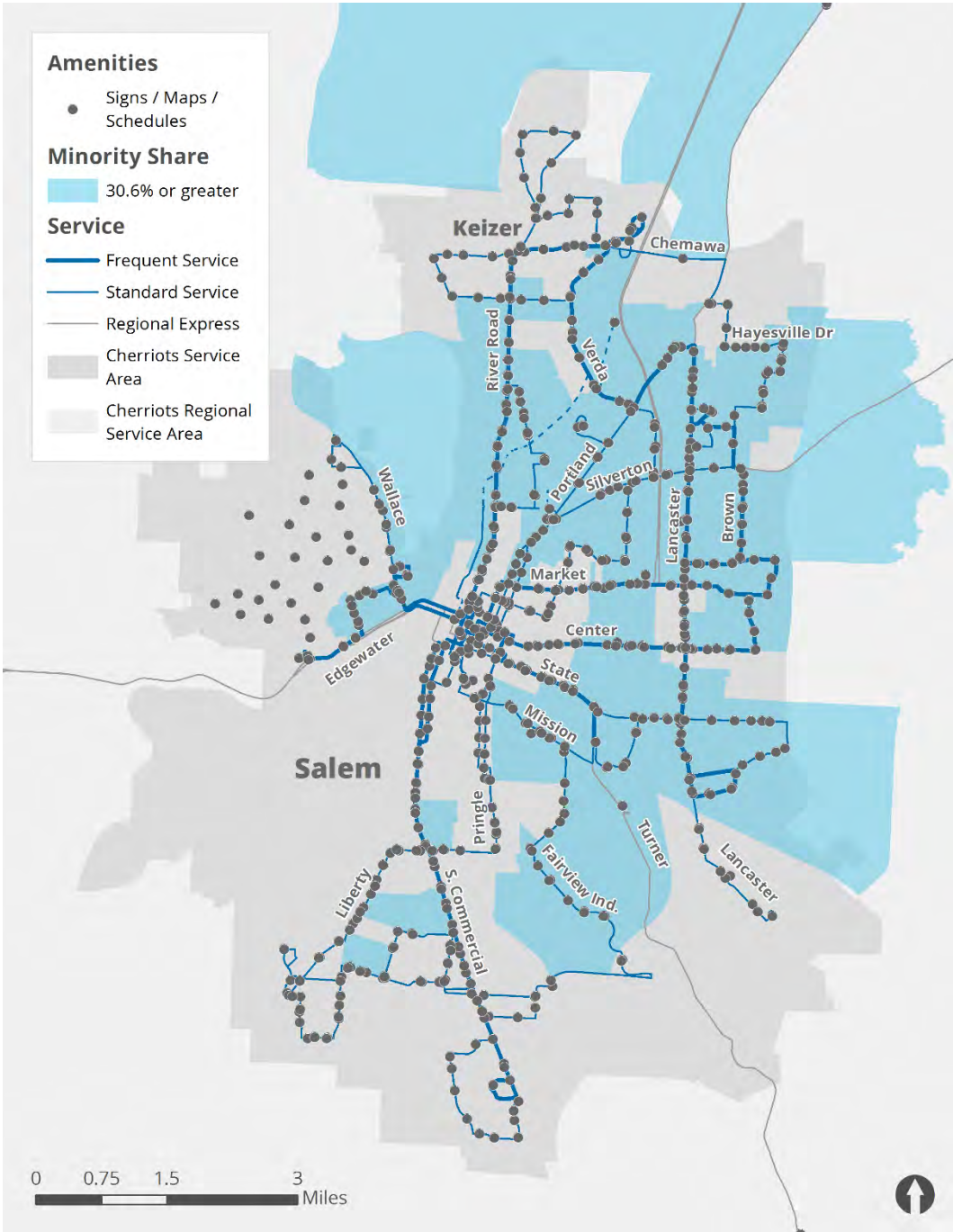
Figures V-15 through V-18 below display SAMTD signs, maps, and schedules. This includes bus stop signs, shelter schedules, and schedule racks with print schedules located throughout the region.

Figure V-15. Signs, Maps, and Schedules with Minority Population (Marion and Polk Counties)



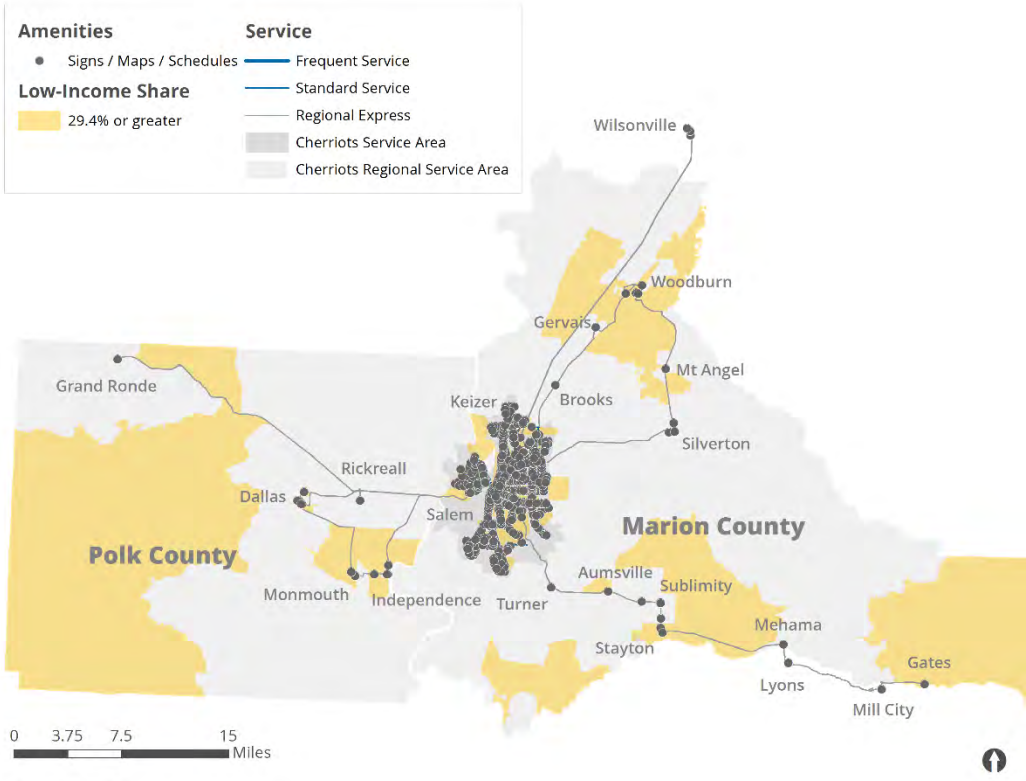
Source: ACS 2011-15, Table B03002

Figure V-16. Signs, Maps, and Schedules with Minority Population (Salem and Keizer)



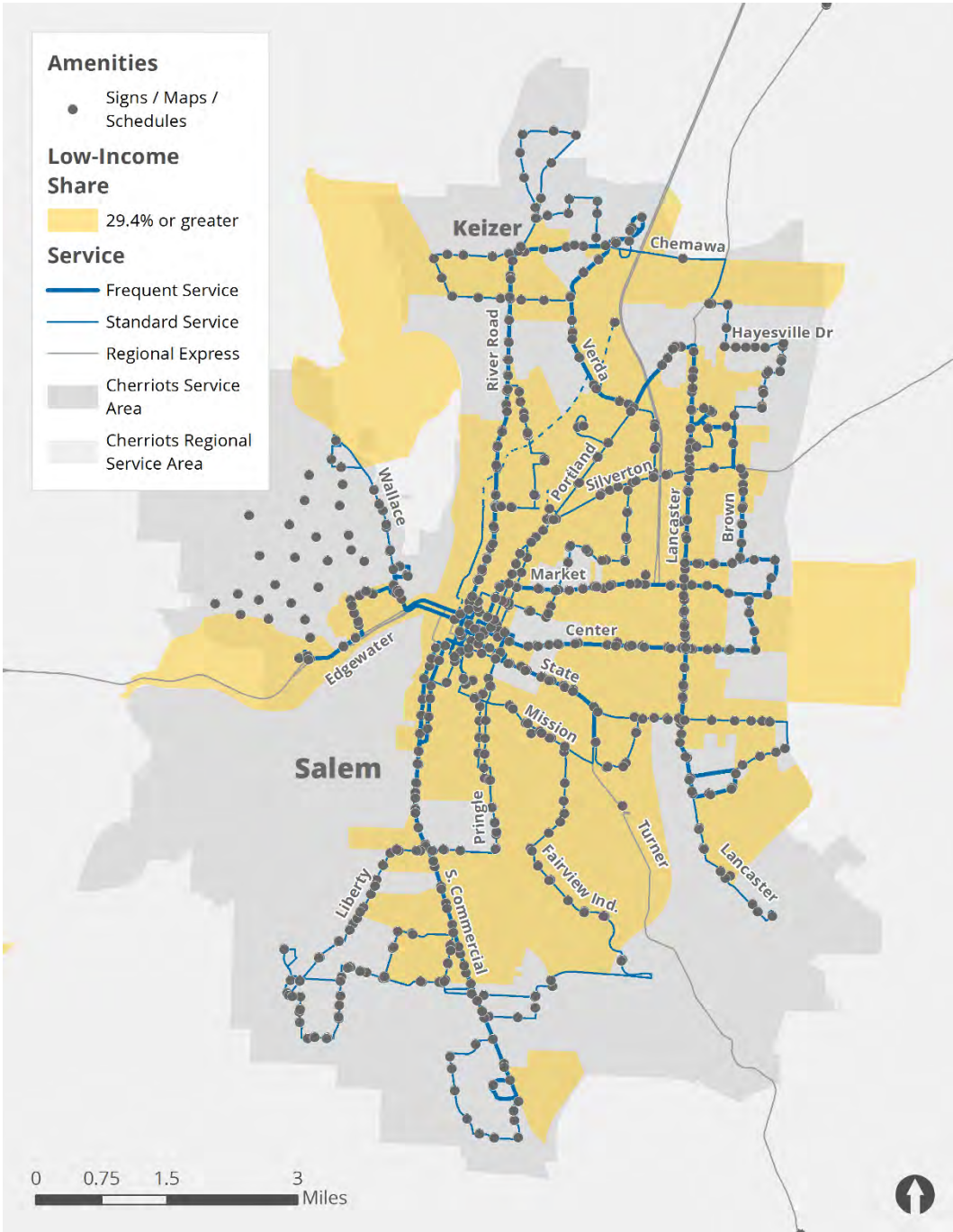
Source: ACS 2011-15, Table B03002

Figure V-17. Signs, Maps, and Schedules with Low-Income (150% Federal Poverty Level) Population (Marion and Polk Counties)



Source: ACS 2011-15, Table C17002

Figure V-18. Signs, Maps, and Schedules with Low-Income (150% Federal Poverty Level) Population (Salem and Keizer)

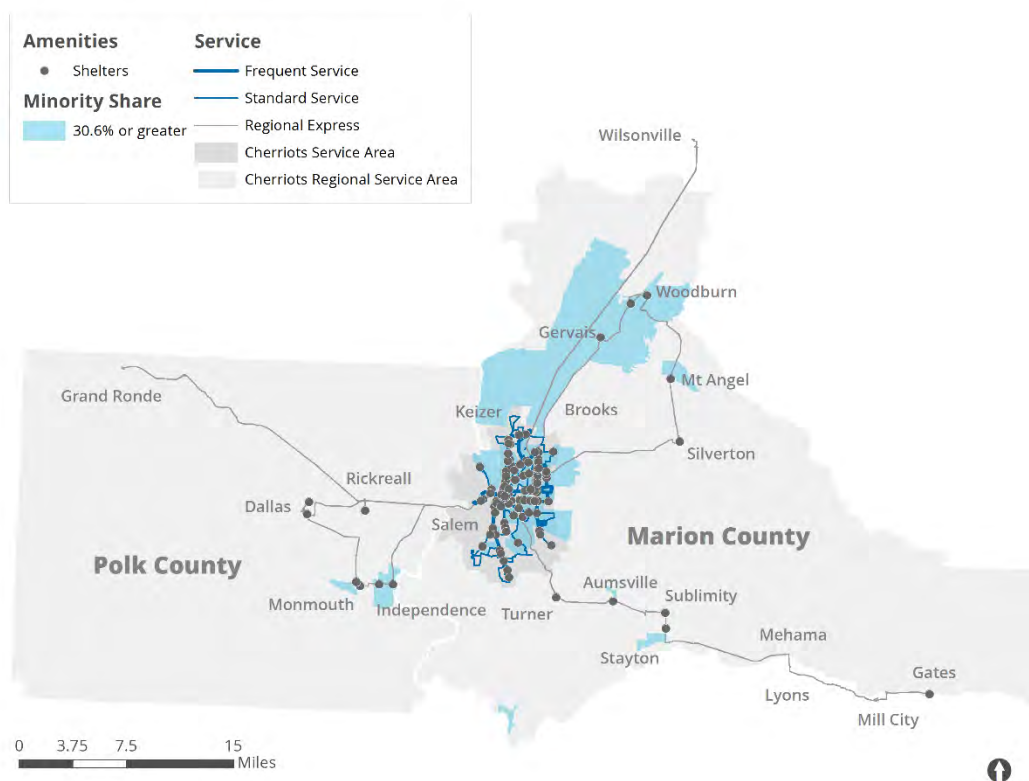


Source: ACS 2011-15, Table C17002

Amenities – Shelters

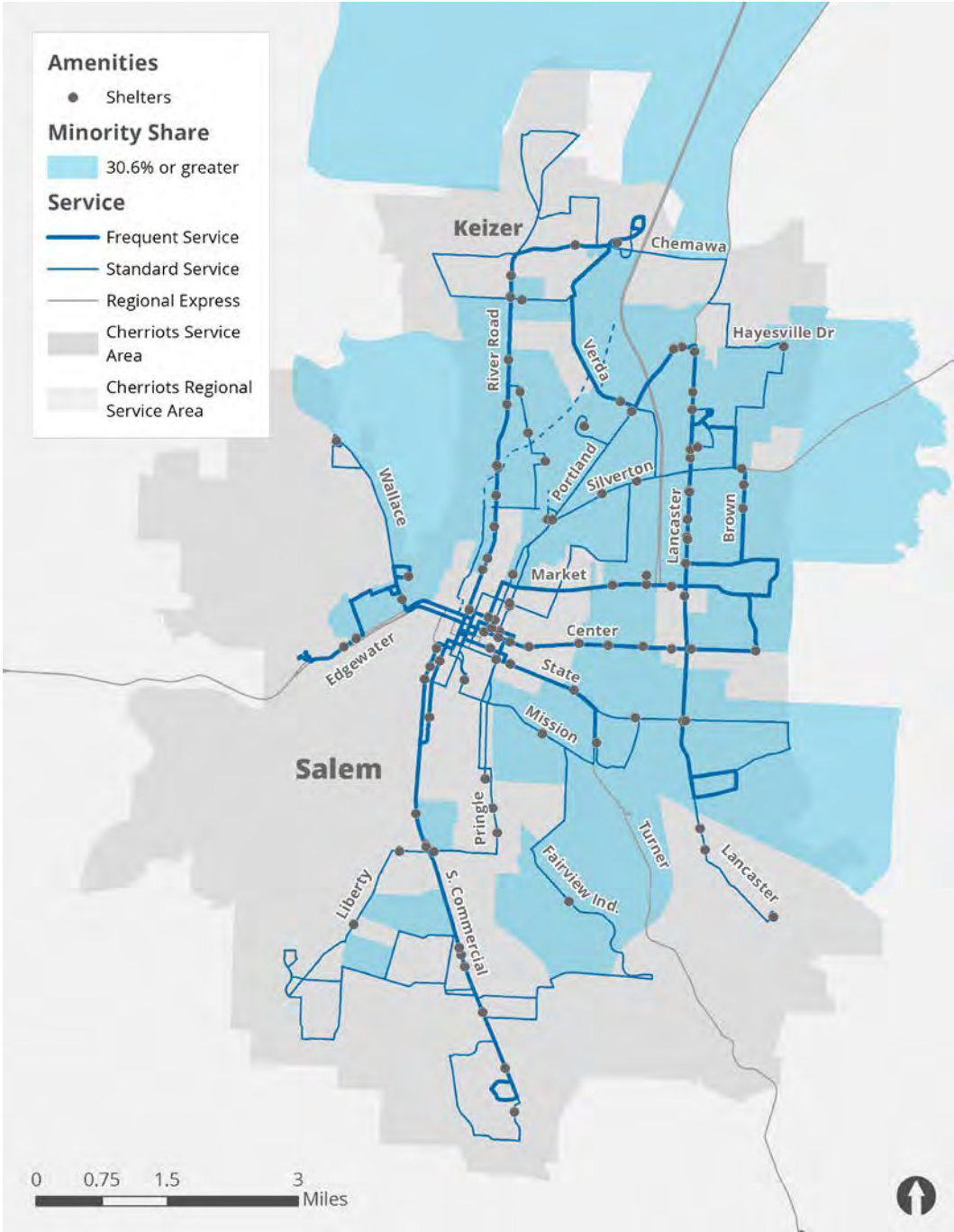
Figures V-19 through V-22 below display all SAMTD shelters and shelters belonging to other transit agencies and institutions that service SAMTD stops.

Figure V-19. Shelters with Minority Population (Marion and Polk Counties)



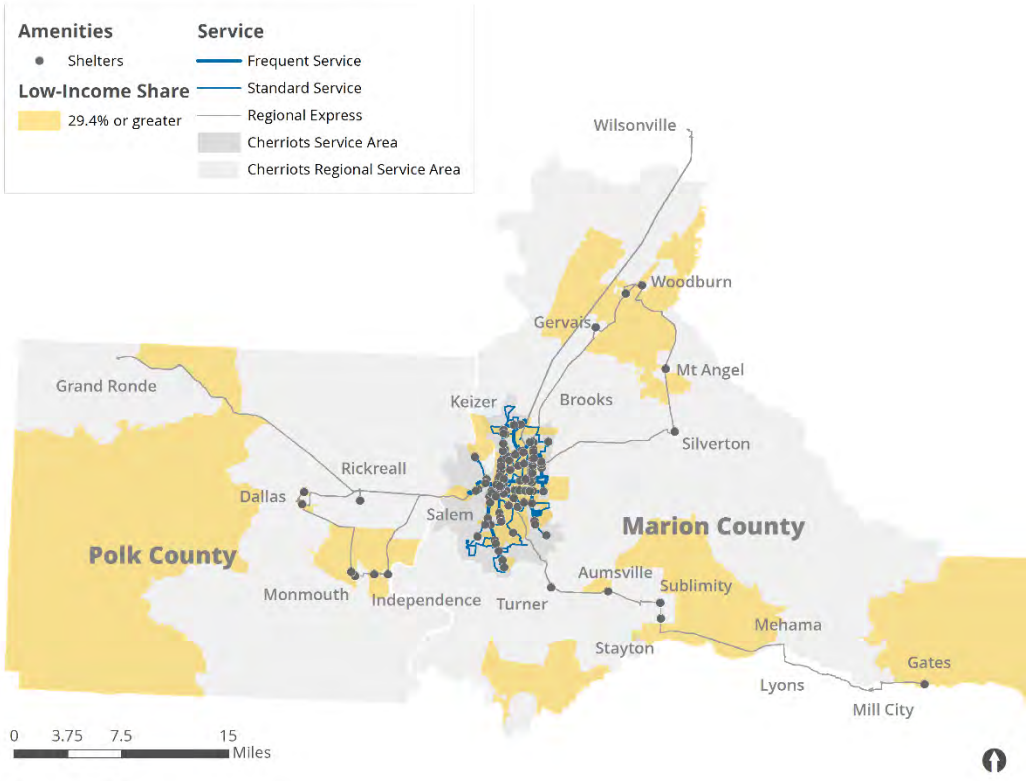
Source: ACS 2011-15, Table B03002

Figure V-20. Shelters with Minority Population (Salem and Keizer)



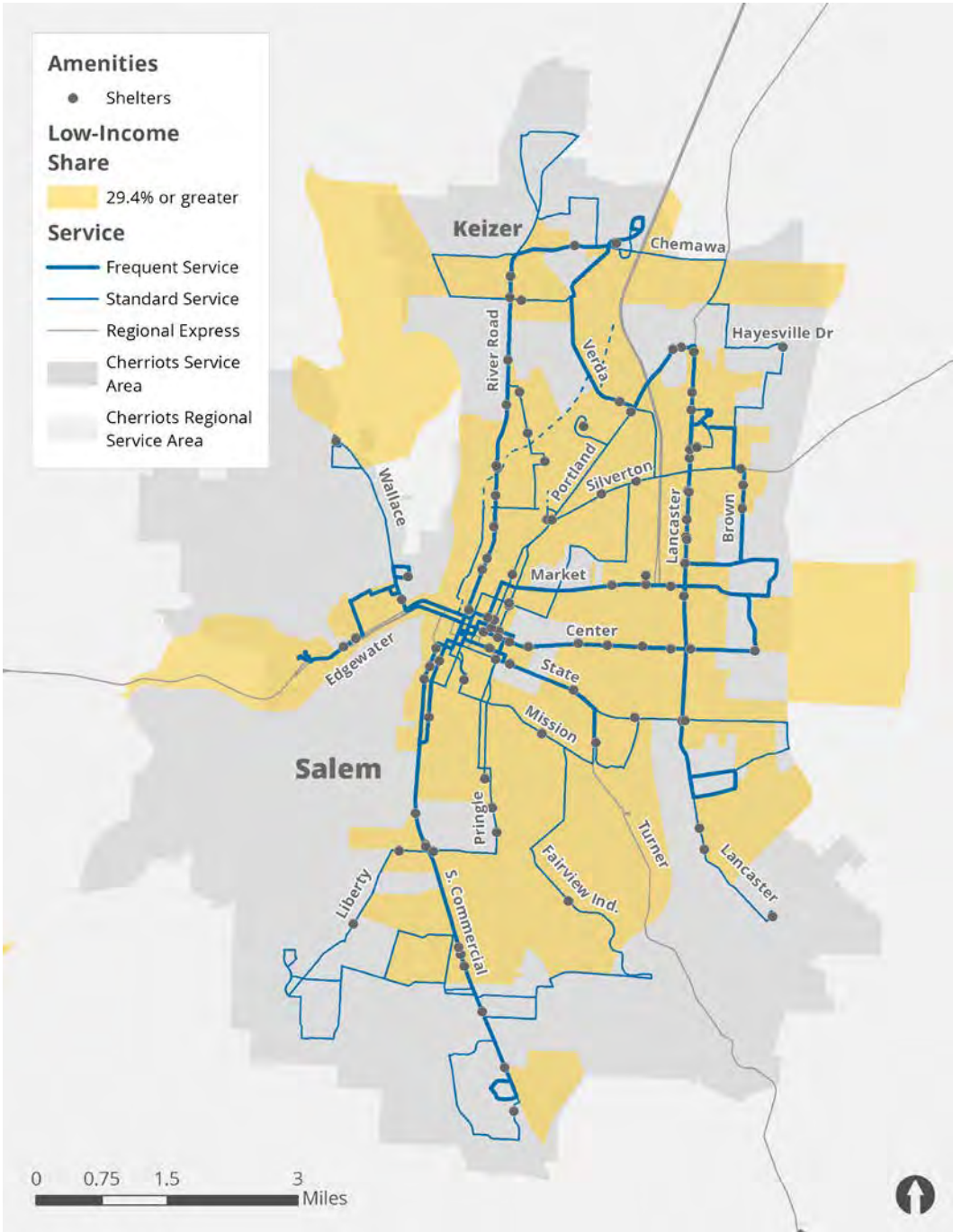
Source: ACS 2011-15, Table B03002

Figure V-21. Shelters with Low-Income (150% Federal Poverty Level) Population (Marion and Polk Counties)



Source: ACS 2011-15, Table C17002

Figure V-22. Shelters with Low-Income (150% Federal Poverty Level) Population (Salem and Keizer)

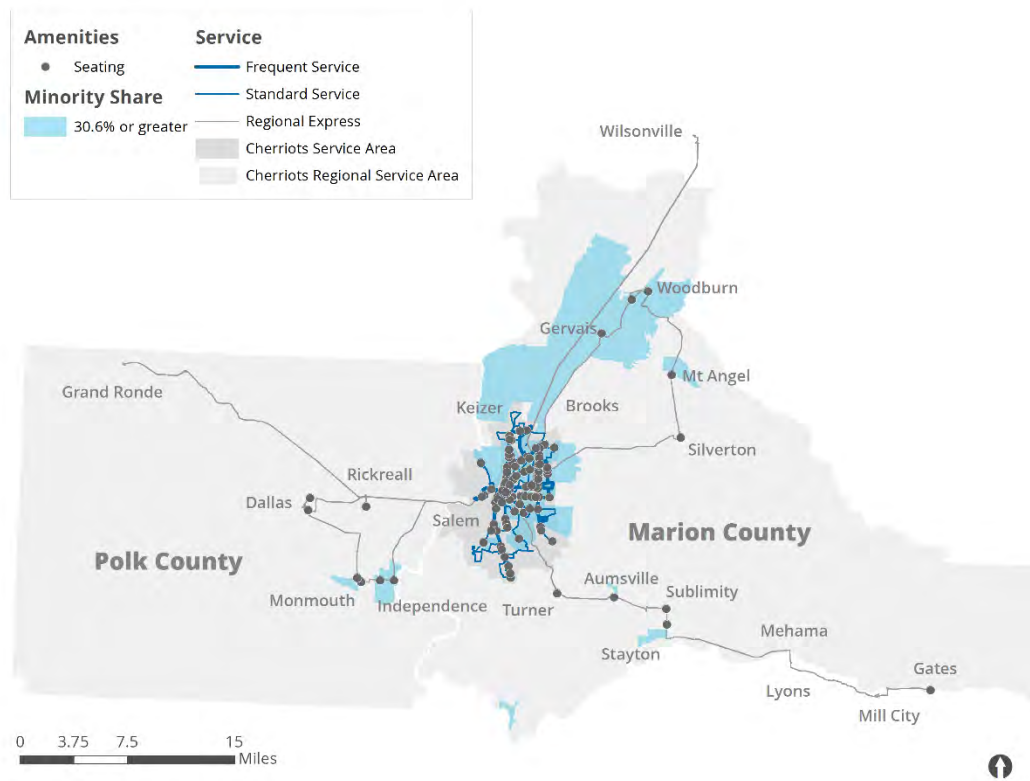


Source: ACS 2011-15, Table C17002

Amenities – Seating

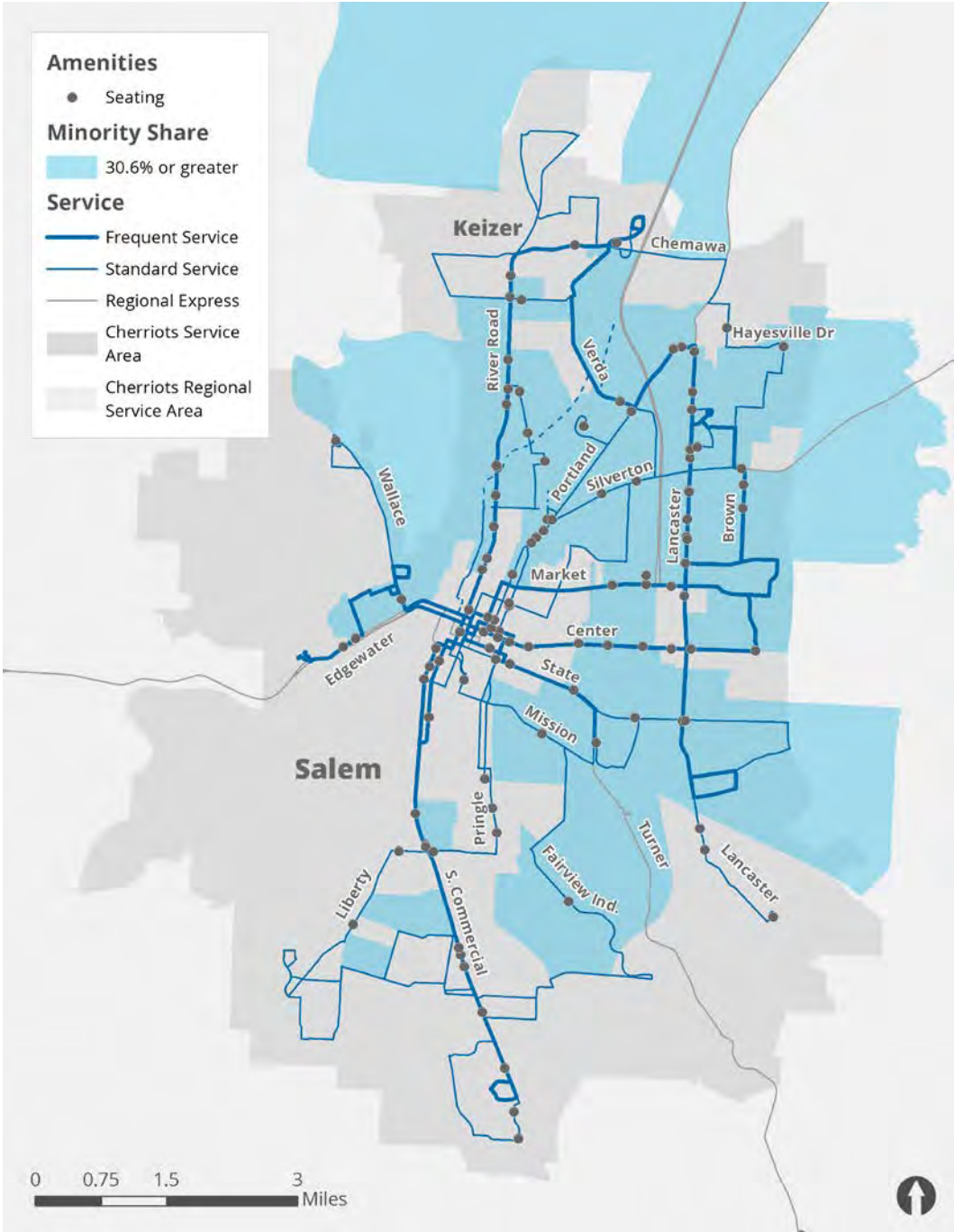
Figures V-23 through V-26 below display all SAMTD seating, including benches in shelters, standalone benches, and simme-seats.

Figure V-23. Seating with Minority Population (Marion and Polk Counties)



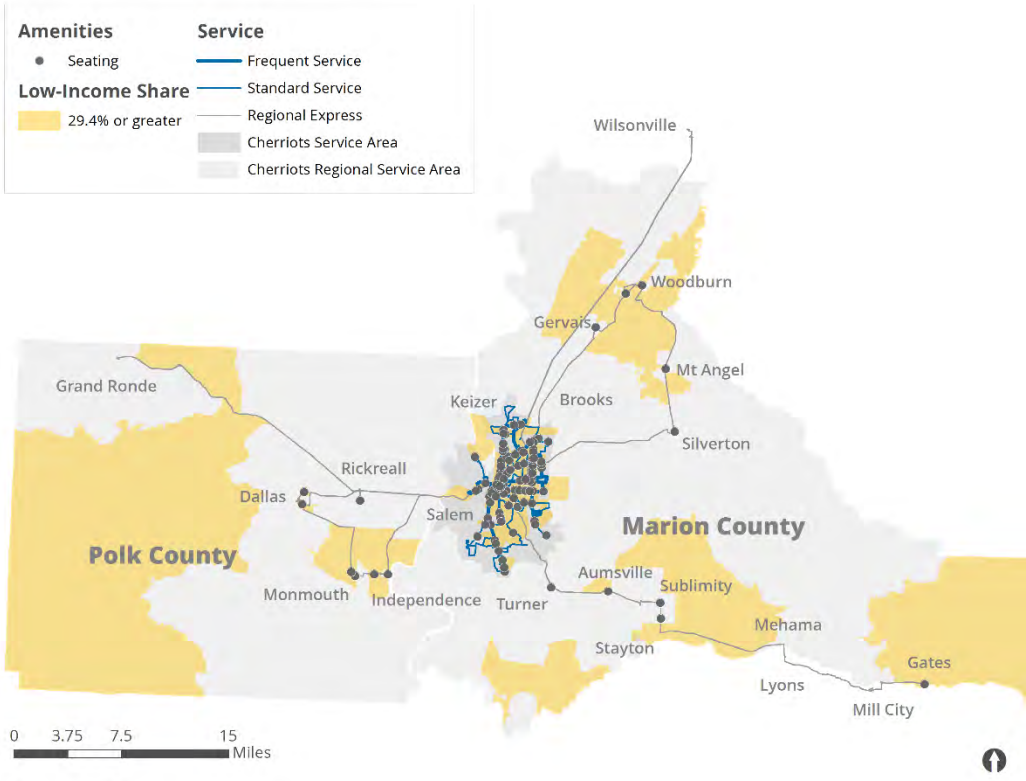
Source: ACS 2011-15, Table B03002

Figure V-24. Seating with Minority Population (Salem and Keizer)



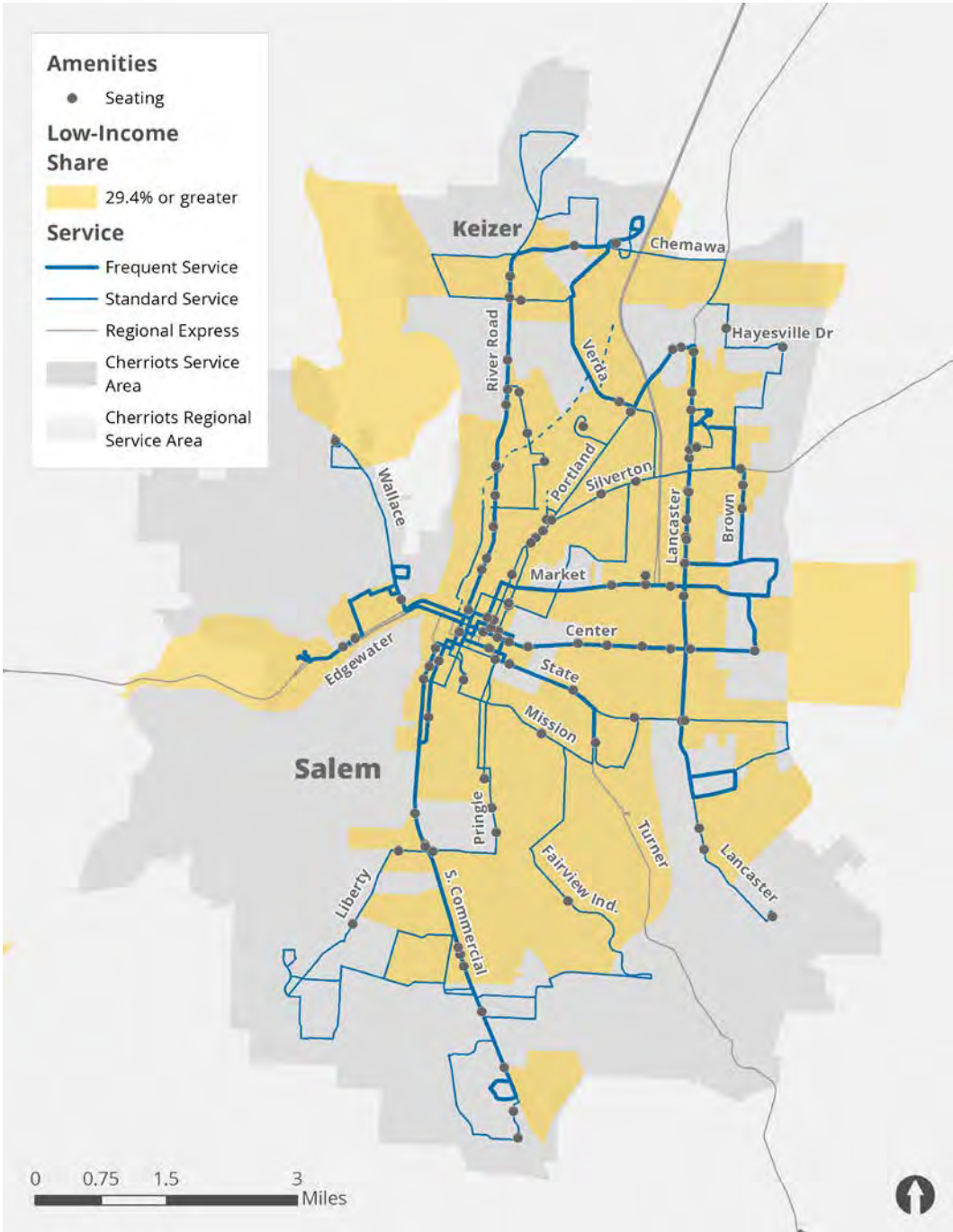
Source: ACS 2011-15, Table B03002

Figure V-25. Seating with Low-Income (150% Federal Poverty Level) Population (Marion and Polk Counties)



Source: ACS 2011-15, Table C17002

Figure V-26. Seating with Low-Income (150% Federal Poverty Level) Population (Salem and Keizer)

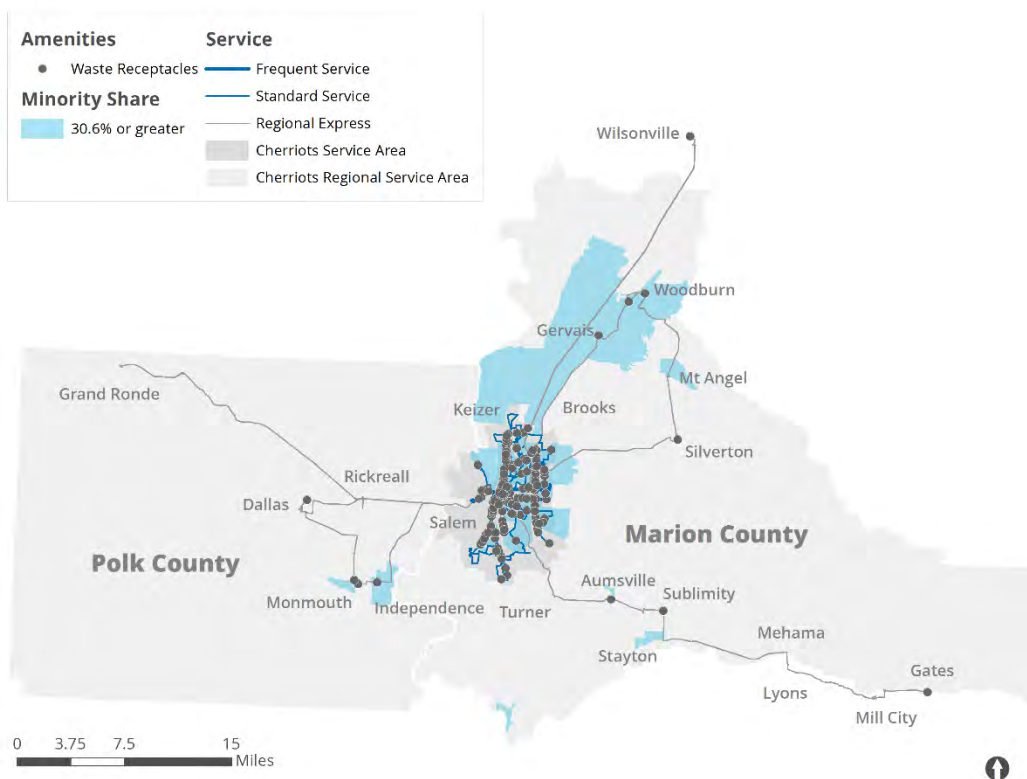


Source: ACS 2011-15, Table C17002

Amenities – Waste Receptacles

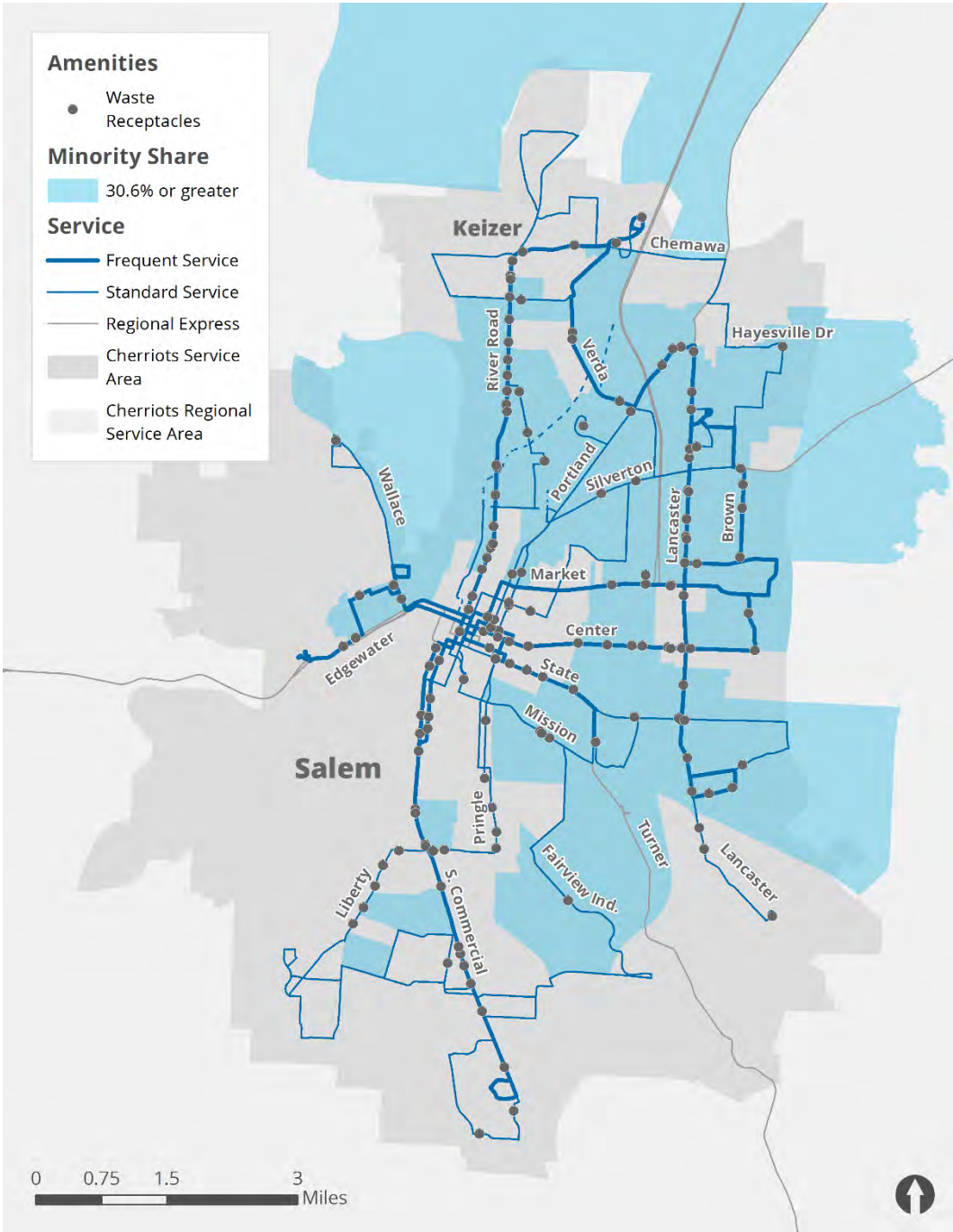
Figures V-27 through V-30 below display all SAMTD waste receptacles, including those in shelters, attached to bus stop poles, and standalone waste receptacles.

Figure V-27. Waste Receptacles with Minority Population (Marion and Polk Counties)



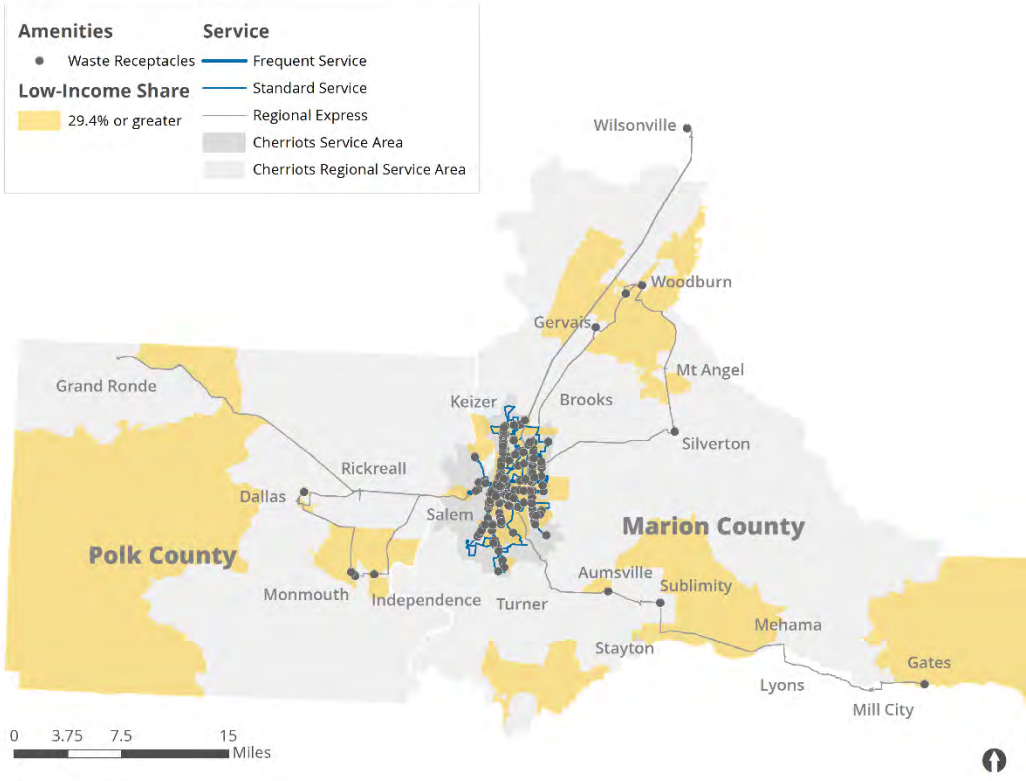
Source: ACS 2011-15, Table B03002

Figure V-28. Waste Receptacles with Minority Population (Salem and Keizer)



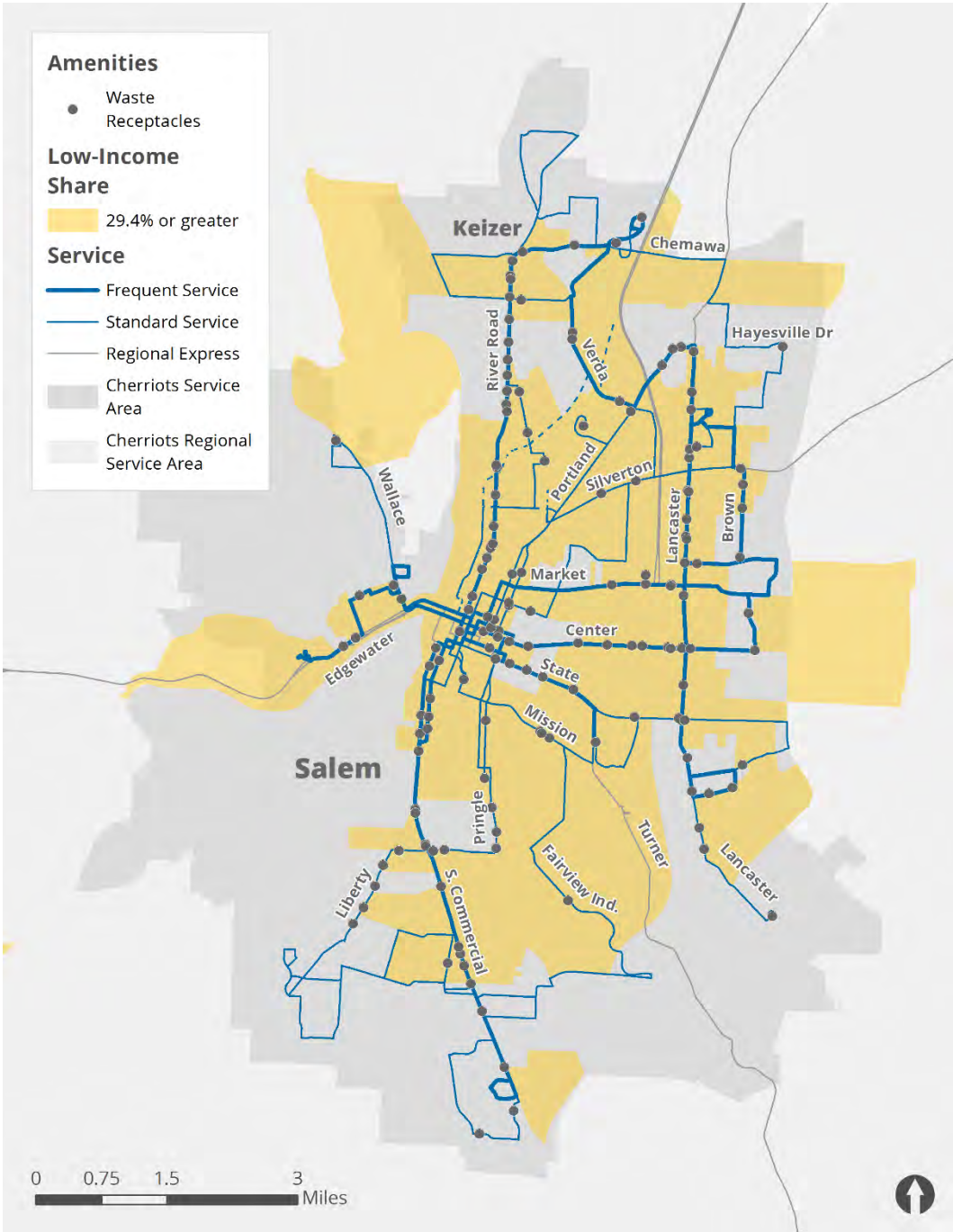
Source: ACS 2011-15, Table B03002

Figure V-29. Waste Receptacles with Low-Income (150% Federal Poverty Level) Population (Marion and Polk Counties)



Source: ACS 2011-15, Table C17002

Figure V-30. Waste Receptacles with Low-Income (150% Federal Poverty Level) Population (Salem and Keizer)



Source: ACS 2011-15, Table C17002

Ridership Characteristics and Demographics

The below ridership characteristics and demographics were collected in 2016 as part of an on board rider survey. The full report is provided in Attachment I. Below are some of the insights from the report (Figures V-31 through V-33):

- Over 40 percent of trips made by riders are made by minority riders
- 24 percent of trips are taken by low-income riders who live in a household earning less than 150% Federal Poverty Level
- 11 percent of trips are taken by riders who speak English less than “very well”

Figure V-31. Trips by Race / Ethnicity

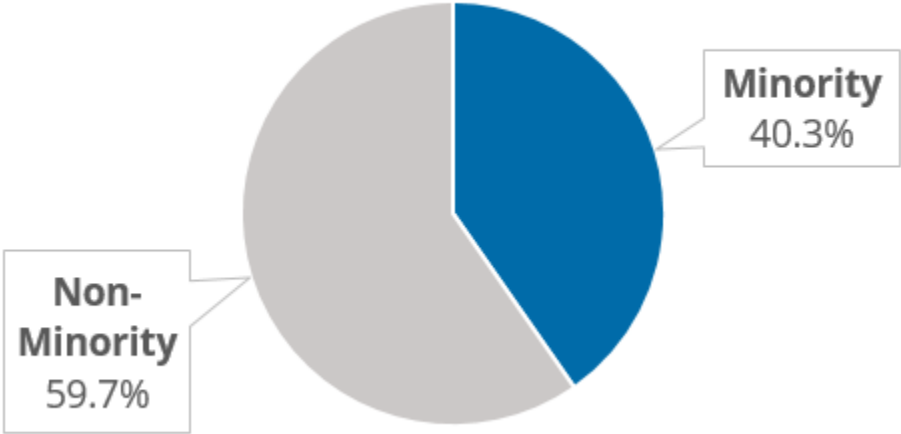


Figure V-32. Trips by Income

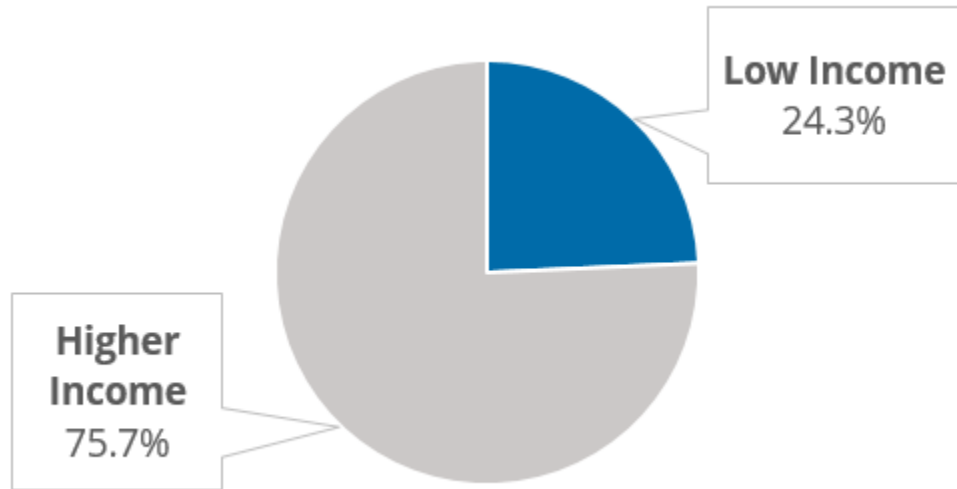
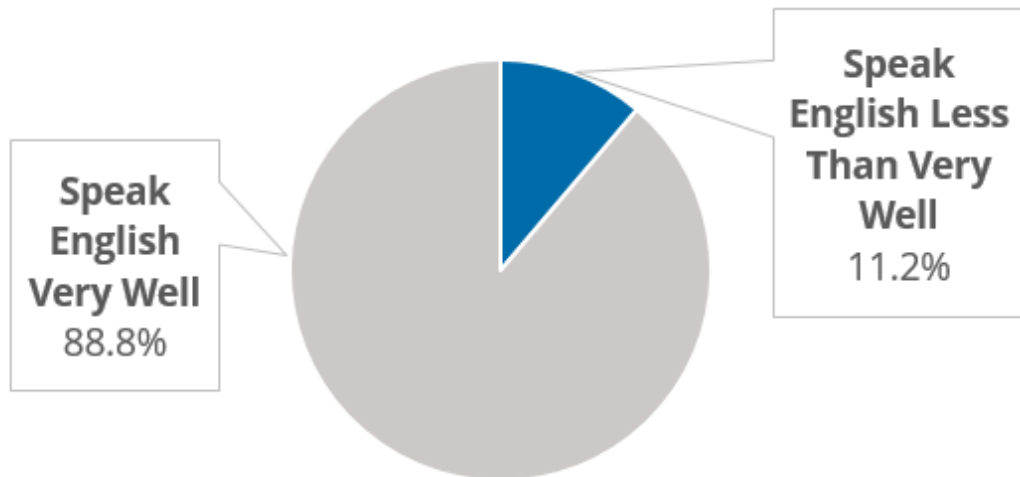


Figure V-33. Trips by Ability to Speak English



Attachments

A: SAMTD Board of Directors Resolution #2017-05, Adopting the 2017 Title VI Update at the May 25, 2017 Board Meeting

B: SAMTD Title VI Notice in English, Spanish, and Russian

C: SAMTD Title VI Complaint Procedure

D: SAMTD Title VI Complaint Form

E: Public Participation Plan

F: SAMTD Language Assistance Plan

G: SAMTD Title VI Policy Documents

H: Subrecipient Title VI Documentation

I: 2016 On-Board Rider Survey Report

J: Fare Equity Analysis for January 2015 Fare Increase

K: Service Equity Analysis for Moving Forward Project

L: Service Equity Analysis for Addition of Route 15X Service

M: Service Equity Analysis for Cherriots Regional Service Change

N: Categorical Exclusion Worksheet with Environmental Justice Review for South Salem Transit Center Project

Attachment A: SAMTD Board of Directors Resolution #2017-05 Adopting the 2017 Title VI Update

The following is a signed copy of Board Resolution #2017-05, which provides proof of the SAMTD Board of Director's adoption of the 2017 Title VI Program Update and all of the changed policies and procedures contained in the document. Resolution #2017-05 was signed at the May 25, 2017 Board Meeting.

RESOLUTION # 2017-05

TO ADOPT THE 2017 TITLE VI PROGRAM FOR SALEM AREA MASS TRANSIT DISTRICT

WHEREAS, the Salem Area Mass Transit District, hereafter referred to as “District,” is required under Federal regulations to conduct a prescribed Disproportionate Burden Analysis in the event of certain Major Service Changes or increases or decreases to transit fares; and,

WHEREAS, a public hearing is required by the Federal Transit Administration (FTA) in the event of Major Service Changes that call for a reduction in transit service or any increase to transit fares; and,

WHEREAS, as a designated recipient of Federal funds, the District is required to submit a Title VI Program through FTA circular 4702.1B; and,

WHEREAS, system-wide service standards and policies must be in place in order to comply with Title VI rules and regulations; and,

WHEREAS, FTA rules and regulations contained in 49 USC §5307 (c)(1)(i) define what a fare change and Major Service Change are, and the minimum circumstances under which a Disproportionate Burden Analysis is required; and,

WHEREAS, the District has occasion to effect changes to its fares and/or its transit services to carry out its mission; and,

WHEREAS, the District wishes to ensure that the public has ample opportunity to participate in the change of transit fares and in the planning and implementation of Major Service Changes, consistent with Federal regulations; and,

WHEREAS, the District wishes to ensure that people living under 150 percent of the Federal Poverty Level (FPL) do not bare any more burden of an increase in fares or in the event of a Major Service Change than those above 150 percent of FPL;

**NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF DIRECTORS OF SALEM
AREA MASS TRANSIT DISTRICT;**

THAT, the District will abide by all of the policies and procedures presented in the approved Title VI Program Update;

ADOPTED by the Board of Directors on the 25th day of May, 2017, and effective thereupon.

ATTEST:

Secretary
Board of Directors

President
Board of Directors

Attachment B: Title VI Notice to the Public

The following document is a copy of the Title VI Notice to the Public, which is posted in English, Spanish, and Russian on all Cherrriots local fixed-route, regional express, RED Line, CherryLift, and West Salem Connector buses as well as at Transit Centers and on cherrriots.org.

Salem-Keizer Transit

Title VI Civil Rights Statement

Salem-Keizer Transit Respects Civil Rights

Salem-Keizer Transit operates its programs without regard to race, color, religion, sex, sexual orientation, national origin, marital status, age, disability, or income status in accordance with Title VI of the Civil Rights Act, ORS Chapter 659A or other applicable law. For more information contact 503-588-2424 (TTY 1-800-735-2900 Oregon Relay network) or email info@cherriots.org.

Salem-Keizer Transit Title VI Statement

Title VI of the Civil Rights Act of 1964 states:

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

Salem-Keizer Transit is committed to complying with the requirements of Title VI in all of its federally funded programs and activities.

Making a Title VI complaint

Any person who believes he or she has been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with Salem-Keizer Transit. Any such complaint must be in writing and filed with Salem-Keizer Transit within 180 days following the date of the alleged discriminatory occurrence. For information on how to file a complaint, contact Salem-Keizer Transit by any of the methods provided below.

Mail

Stephen Dickey – Civil Rights Officer
Salem-Keizer Transit
555 Court St NE, Suite 5230
Salem, OR 97301

Phone

503-588-2424

Fax

503-566-3933

Email

info@cherriots.org

Spanish translation

Salem-Keizer Transit

Respetar los Derechos Civiles

Salem-Keizer Transit opera sus programas sin tomar en consideración raza, color, religión, sexo, orientación sexual, origen nacional, estado marital, edad ni discapacidades de acuerdo con el Título VI del Acta de los Derechos Civiles, ORS Capítulo 659A, o con cualquier otra ley pertinente. Para más información llame al 503-588-2424 (TTY 1-800-735-2900) o por correo electrónico info@cherriots.org.

Declaración de Políticas del Título VI de Salem-Keizer Transit

El Título VI de la Ley de Derechos Civiles de 1964 establece que: "Ninguna persona en los Estados Unidos, por causa de su raza, color o nacionalidad, deberá ser excluida de participar en cualquier programa o actividad que reciba asistencia financiera federal, ni se le negarán los beneficios ni será discriminado en dichos programas o actividades." Salem-Keizer Transit se compromete a cumplir con los requisitos del Título VI en todos los programas y actividades subvencionados federalmente.

Quejas del Título VI

Cualquier persona que crea haber sido agraviada por una práctica discriminatoria ilegal según el Título VI puede presentar una queja ante Salem-Keizer Transit. Dicha queja se debe realizar por escrito y se debe presentar ante Salem-Keizer Transit dentro de los 180 días posteriores a la fecha en la que ocurrió la presunta discriminación. Para obtener información sobre cómo presentar una queja, comuníquese con Salem-Keizer Transit por medio de cualquiera de los métodos que se brindan a continuación.

Correo

Stephen Dickey – Civil Rights Officer
Salem-Keizer Transit
555 Court St NE, Suite 5230
Salem, OR 97301

Teléfono

503-588-2424

Fax

503-566-3933

Correo electrónico

info@cherriots.org

Транспортное агентство Сэлем-Кайзер (Salem-Keizer Transit)

Заявление о соблюдении положений Раздела VI Закона о гражданских правах

Транспортное агентство Сэлем-Кайзер (Salem-Keizer Transit) ответственно относится к соблюдению гражданских прав

В соответствии с Разделом VI Закона о гражданских правах, главой 659A Свода законов штата Орегон с дополнениями и изменениями (ORS) и другими применимыми законодательными требованиями, программы Транспортного агентства Сэлем-Кайзер (Salem-Keizer Transit) осуществляются при условии недопущения дискриминации по признаку расовой или религиозной принадлежности, цвета кожи, пола, сексуальной ориентации, национального происхождения, семейного положения, возраста, инвалидности или размеров дохода. Для получения дополнительной информации позвоните по телефону 503-588-2424 (номер для пользователей телетайпа (TTY) 1-800-735-2900 Орегонской сети релейной связи) или напишите на адрес электронной почты info@cherriots.org.

Заявление Транспортного агентства Сэлем-Кайзер (Salem-Keizer Transit) о соблюдении положений Раздела VI

Разделом VI Закона о гражданских правах от 1964 г. устанавливается следующее:

«Ни одно лицо в Соединенных Штатах Америки не может быть исключено из числа участников программ или работ, финансируемых государством, не может получить отказ в получении благ в виду такого участия или подвергаться дискриминации в рамках таких программ или работ на основании расовой принадлежности, цвета кожи или национального происхождения».

Транспортное агентство Сэлем-Кайзер (Salem-Keizer Transit) несет обязательства по соблюдению требований Раздела VI при осуществлении всех финансируемых государством программ и работ.

Жалоба на несоблюдение требований Раздела VI

В соответствии с положениями Раздела VI, любое лицо, считающее, что против него был совершен незаконный поступок дискриминационного характера, может подать жалобу в Транспортное агентство Сэлем-Кайзер (Salem-Keizer Transit). Подобная жалоба должна быть составлена в письменном виде и подана в Транспортное агентство Сэлем-Кайзер (Salem-Keizer Transit) в течение 180 дней с даты предполагаемого инцидента, связанного с дискриминацией. Для получения подробной информации о процедуре подачи жалобы свяжитесь с Транспортным агентством Сэлем-Кайзер (Salem-Keizer Transit) одним из указанных ниже способов.

По почте

Stephen Dickey – Civil Rights Officer
Salem-Keizer Transit
555 Court St. NE, Ste. 5230
Salem OR 97301

По телефону
503-588-2424

По факсу
503-566-3933

По эл. почте
info@cherriots.org

Attachment C: Title VI Complaint Procedure

The following document is a copy of the Title VI Complaint Procedure, which is available on cherriots.org.

SAMTD Title VI Complaint Procedure

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color or national origin may file a written complaint with Salem Area Mass Transit District (SAMTD), 555 Court St., NE Suite 5230, Salem, Oregon 97301. Complainants have the right to complain directly to the appropriate federal agency. Every effort will be made to obtain early resolution of complaints. The option of informal meeting(s) between the affected parties and the Title VI manager may be utilized for resolutions. The Title VI manager will notify SAMTD's General Manager of all Title VI related complaints as well as all resolutions.

PROCEDURE

1. The complaint must meet the following requirements:
 - a. Complaint shall be in writing and signed by the complainant(s). In cases where Complainant is unable or incapable of providing a written statement, as verbal complaint may be made. The Title VI manager will interview the Complainant and assist the person in converting verbal complaints to writing. All complaints must, however, be signed by the Complainant or his/her representative.
 - b. Include the date of the alleged act of discrimination, date when the Complainant became aware of the alleged act of discrimination: or the date on which the conduct was discontinued or the latest instance of conduct.
 - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.
 - d. Federal and state law requires complaints be filed within 180 calendar days of the alleged incident.
2. Upon receipt of the complaint, the Title VI manager will determine its jurisdiction, acceptability, need for additional information.

3. The complainant will be provided with a written acknowledgement that SAMTD has either accepted or rejected the complaint.
4. A complaint must meet the following criteria for acceptance:
 - a. The Complaint must be filed within 180 days of the alleged occurrence.
 - b. The allegation must involve a covered basis such as race, color or national origin.
 - c. The allegation must involve SAMTD service of a Federal-aid recipient, sub-recipient or contractor.
5. A complaint may be dismissed for the following reasons:
 - a. The Complainant requests the withdrawal of the complaint.
 - b. The Complainant fails to respond to repeated requests for additional information needed to process the complaint.
 - c. The Complainant cannot be located after reasonable attempts.
6. Once SAMTD's Title VI manager decides to accept the complaint for investigation, the Complainant will be notified in writing of such determination. The complaint will receive a case number and will be logged in a database identifying: Complainants name, basis, alleged harm, race color and national origin of the Complainant.
7. In cases where SAMTD's Title VI manager assumes the investigation of the complaint, within 90 calendar days of the acceptance of the complaint, SAMTD's Title VI manager will prepare an investigative report for review by the General Manager or his/her designee. The report shall include a narrative description of the incident, indemnification of persons interviewed, findings and recommendations for disposition.
8. The investigative report and its finding will be reviewed by the General Manager of SAMTD and in some cases by SAMTD's Legal Counsel. The report will be modified as needed.
9. The General Manager/Legal Counsel will make a determination on the disposition of the complaint. Dispositions will be stated as follows:
 - a. In the event SAMTD is in noncompliance with Title VI regulation

remedial actions will be listed.

10. Notice of determination will be mailed to the Complainant. Notices shall include information regarding appeal rights of Complainant and instruction for initiating such and appeal. Notice of appeals are as follows:
 - a. SAMTD will reconsider this determination, if new facts come to light.
 - b. If Complainant is dissatisfied with the determination and/or resolution set forth by SAMTD, the same complaint may be submitted to the FTA for investigation. Complainant will be advised to contact the Federal Transit Administration Office of Civil Rights, Attn: Title VI Program Coordinator, East Building 5th Floor – TCR 1200 New Jersey Ave. SE, Washington, D.C. 20590, Telephone 202-366-4018.
11. A copy of the complaint and SAMTD's investigation report/letter of finding and Final Remedial Action Plan, if appropriate will be issued to FTA within 120 days of the receipt of the complaint.
12. A summary of the complaint and its resolution will be included as part of the Title VI updates to the FTA.

RECORDKEEPING REQUIREMENT

The Title VI manager will ensure that all records relating to SAMTD's Title VI Complaint Process are maintained with department records.

Records will be available for compliance review audits.

Attachment D: Title VI Complaint Form

The following document is a copy of the Title VI Complaint Form, which is available on cherriots.org.

Title VI Complaint Form Worksheet

Tell us how to contact you:

Name: _____

Home Phone: _____ Work Phone: _____ Mobile Phone: _____

Best time to call (if additional information is needed): _____

E-mail Address: _____

Date of Alleged Incident: _____

Were you discriminated against because of:

Race National Origin Color

Other _____

Please explain as clearly as possible what happened and how you were discriminated against. Indicate who was involved. Be sure to include as much detail as possible including names and contact information of witnesses.

(use back if more space is needed for explanation)

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

Federal Agency State Agency Local Agency

If you have filed a complaint, please provide information about a contact person at the agency where the complaint was filed.

Name: _____

Address: _____

City, State & Zip Code: _____

Phone: _____

E-Mail: _____

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

Signature

Date

This form may be taken to the Customer Service Office at the Cherriots Downtown Transit Center or it may be brought to or mailed to the Cherriots Administrative Office at:

Stephen Dickey – Civil Rights Officer

Cherriots

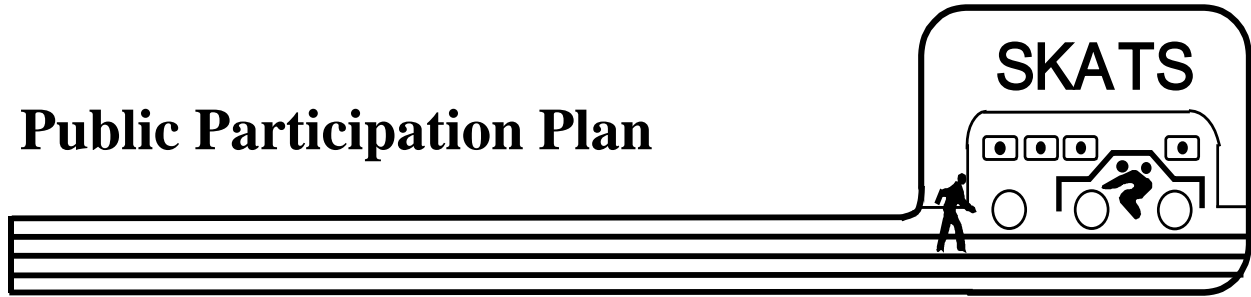
555 Court St. NE, Suite 5230

Salem, OR 97301

Attachment E: Public Participation Plan

The following document is a copy of the 2013 Salem-Keizer Area Transportation Study (SKATS) Public Participation Plan, which is a model used by SAMTD planning projects.

Public Participation Plan



For the Regional Transportation Planning Process
in the Salem-Keizer Urban Area

Adopted by the SKATS Policy Committee
April 23, 2013

prepared by:

Salem-Keizer Area Transportation Study

administered by:

Mid-Willamette Valley
Council of Governments
100 High Street SE
Salem, Oregon 97301
(503) 588-6177
www.mwvcog.org

Public comments can be sent to the address above
or e-mail to mwvcog@mwvcog.org

Salem-Keizer Area Transportation Study (SKATS)

The Salem-Keizer Area Transportation Study (SKATS) is the Metropolitan Planning Organization (MPO) designated by the Governor to develop and implement a coordinated, comprehensive and continuing planning process that addresses issues related to the transportation systems of regional significance in the urban area.

SKATS is governed by a policy committee made up of elected officials from the jurisdictions within our region (the cities of Salem, Turner and Keizer, and Marion and Polk counties) and representatives of agencies, such as the Oregon Department of Transportation (ODOT), and the Salem Area Mass Transit District (SAMTD), which are responsible for building and operating our transportation infrastructure. The SKATS Policy Committee provides the region a valuable forum in which to consider the issues, develop coordinated strategies, and recommend prudent investments in our system to solve the transportation challenges we face in the region. Inasmuch as most of the significant improvements to our transportation system require a pooling of many types of federal, state, and local dollars, no single jurisdiction has either the authority or the financial resources to "go it alone." The SKATS Policy Committee provides the means for us to develop the "community of interest" that we must have to coordinate our transportation planning and investments to solve our current and expected problems, and to create a workable system for our future.

SKATS Policy Committee:

Cathy Clark	City Councilor, City of Keizer
Dan Clem	City Councilor, City of Salem
Paul Thomas.....	Mayor, City of Turner
Sam Brentano.....	Commissioner, Marion County
Craig Pope.....	Commissioner, Polk County
Tim Potter	Area Manager, Oregon Department of Transportation
Bob Krebs	Board Member, Salem Area Mass Transit District
Ron Jones	Board Member, Salem-Keizer School District

The preparation of this report has been financed in part by funds from the Federal Highway Administration, U.S. Department of Transportation, and the Oregon Department of Transportation (ODOT), Region 2. SKATS and the authors are solely responsible for the material contained herein.

Public Participation Plan

For the Regional Transportation Planning Process
in the Salem-Keizer Urban Area

Adopted by the SKATS Policy Committee
April 23, 2013

prepared by:

Salem-Keizer Area Transportation Study

administered by:

**Mid-Willamette Valley
Council of Governments
100 High Street SE
Salem, Oregon 97301
(503) 588-6177
www.mwvcog.org**

Public comments can be sent to the above address or e-mail to mwvcog@mwvcog.org

The Salem-Keizer Area Transportation Study (SKATS) hereby gives public notice that it is the policy of the agency to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 pm Environmental Justice, and related statutes and regulations in all programs and activities. Title VI requires that no person in the United States of America shall, on the ground of race, color, sex, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which SKATS receives federal financial assistance. Any person who believes that they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with SKATS. Any such complaint must be in writing and filed with SKATS within 180 days following the date of the alleged discriminatory occurrence. For more information, or to obtain a Title VI Discrimination Complaint Form, please see our Web site at: www.mwvcog.org or call 503-588-6177.

Acronyms Used in this Document

ADA	Americans with Disabilities Act
AQCD	Air Quality Conformity Determination
CAAA	Clean Air Act Amendments
CAC	Citizens Advisory Committee
CIP	Capital Improvement Program
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
LTSP	Local Transportation Systems Plan
MAP-21	Moving Ahead for Progress in the 21st Century
MPO	Metropolitan Planning Organization
ODOT	Oregon Department of Transportation
OTP	Oregon Transportation Plan
PC	Policy Committee
PPP	Public Participation Plan
RTSP	Regional Transportation Systems Plan
SAFETEA-LU	Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users
SAMTD	Salem Area Mass Transit District
SIP	State Implementation Plan
SKATS	Salem-Keizer Area Transportation Study
TAC	Technical Advisory Committee
TIP	Transportation Improvement Program
TMA	Transportation Management Area
TPR	Transportation Planning Rule
UPWP	Unified Planning Work Program

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INTRODUCTION

Background

The federal surface transportation acts (the latest being Moving Ahead for Progress in the 21st Century - MAP-21) require urban areas, through a Metropolitan Planning Organization (**MPO**), to develop and implement a continuing, cooperative, and comprehensive transportation planning process. As the designated MPO for our community, the Salem-Keizer Area Transportation Study (**SKATS**) is responsible for the planning of the transportation systems of regional significance, as well as ensuring that the plan conforms with federal requirements and regulations including air quality conformity.

Every four (4) years, SKATS revises the long-range (20-year) **Regional Transportation Systems Plan (RTSP)**. Approximately every two (2) years, and corresponding with the Oregon Department of Transportation update of its State Transportation Improvement Program (STIP), SKATS updates its **Transportation Improvement Program (TIP)** which identifies and schedules the state and federal funding of transportation system improvement projects for the next four years in our area.

Along with the Oregon Department of Transportation, local cities, and counties, and the Salem Area Mass Transit District, SKATS develops transportation studies involving major issues of regional significance such as congestion in the Highway 22 Corridor in the urban area and on the Willamette River bridge crossings. The cities, counties, and agencies also conduct local transportation studies, and develop transportation plans, and strategic plans. These local plans are the object of their own extensive review and public comment periods and processes. The recommendations from these regional and local transportation studies result in the identified projects and programs in the SKATS RTSP and TIP.

SKATS is governed by a Policy Committee made up of elected officials from the jurisdictions within our region (the cities of Salem, Turner, and Keizer and Marion and Polk Counties) and representatives of agencies (the Oregon Department of Transportation, the Salem Area Mass Transit District, and Salem-Keizer School District). These jurisdictions and agencies are responsible for building and operating our transportation system. The Policy Committee considers recommendations from the SKATS Technical Advisory Committee which is made up of jurisdictional staff and agency representatives. The Policy Committee has the responsibility for adopting the major planning products--RTSP, TIP, Unified Planning Work Program (UPWP)--federally required of SKATS.

Purpose of the Public Participation Program

There is an extensive public involvement process associated with each of the major planning, programming, and project decisions made by the SKATS Policy Committee. This **Public Participation Plan** serves as a guide for that process to ensure the ongoing opportunity for broad-based public participation in the development and review of regional transportation plans, programs, and projects. More specifically, we are committed to:

- 1) Informing the community about a range of transportation system and transportation-related urban design issues;
- 2) Identifying and addressing community concerns about transportation and transportation-related issues;
- 3) Providing opportunities for the greater Salem-Keizer community to identify priorities and determine the relative importance of various alternative transportation system improvements and transportation-related land use actions, as well as the relative merits of community travel behavior choices; and
- 4) Meaningfully involving local citizens, affected agencies, and other groups or individuals interested in planning activities for the regional transportation system.

Consistency with Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) and Moving Ahead for Progress in the 21st Century (MAP-21)

SAFETEA-LU requires Metropolitan Planning Organizations to develop a Public Participation Plan in consultation with interested parties. MAP-21, adopted in July 2012, continues the public participation requirements.

In 2006, SKATS Public Participation Plan was adopted after a public outreach process involving elected officials, neighborhood, community and service groups, government agencies, and staff. SKATS staff discussed the participation plan at meetings of neighborhood associations, the local bicycle transportation alliance, and a local Latino organization (Hispanic Human Services Council). Staff conducted comprehensive phone interviews to solicit opinions on how to best communicate with the public and how to effectively involve the public in the current and future planning process. Staff interviewed a representative of the Oregon freight hauling industry, the director of school transportation, members of environmental organizations, transit union members, and representatives of cycling organizations, and disabled citizens' service providers. The information provided through these interviews was incorporated into the Public Participation Plan and has been used to guide our continued outreach efforts during the preparation of the transportation plan.

This current update of the Public Participation Plan refines SKATS' public processes in light of experiences since 2006 and feedback from our transportation planning partners and certification reviews.

Public Participation, Title VI, and Environmental Justice

Title VI of the Civil Rights Act of 1964, prohibits discrimination on the basis of race, color, or national origin in any program receiving Federal assistance. The 1994 Executive Order 12898 on Environmental Justice protects minority and low-income populations. Although all three are separate, they complement one another in ensuring fair and equitable distribution of transportation resources and services. Through the public-involvement process, potential environmental-justice concerns must be identified, addressed, or mitigated. The SKATS transportation-planning program also complies with provisions of Title VI. Information and

activities specific to Environmental Justice principles and requirements and Title VI are covered in a separate, adopted SKATS Title VI plan.

VISION, GOALS, OBJECTIVES, AND POLICIES

VISION - An environment in which citizens and their representative agencies, organizations, and other interested parties in the Salem-Keizer Transportation Study area are provided opportunities and encouraged to be active participants in meaningfully shaping plans for their regional transportation system.

GOAL ONE: An open and ongoing public involvement process that ensures full citizen, agency, and interested party participation in, and input into, regional transportation planning.

Objective 1: SKATS planning staff will identify organizations and individuals representing a broad spectrum of community interests and actively seek their participation in the transportation planning process.

Policy 1: SKATS will seek participation and comment from all segments of the public. In accordance with the federal transportation act (the latest being MAP-21) and the current regulations regarding transportation planning and public participation (23 CFR 450.316 for public participation), SKATS will “provide citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with a reasonable opportunity to comment on the transportation plan.”

Policy 2: SKATS will work to identify new stakeholders interested in or affected by the transportation process.

Policy 3: SKATS will work to identify traditionally under-involved populations within the region, including minority, low income, and senior citizen populations.

Policy 4: SKATS shall seek review and recommendations from local governments.

Objective 2: SKATS will seek to improve its public participation program by regularly reviewing this plan and our outreach activities and by seeking guidance from citizens.

Policy 1: SKATS will regularly query the public and interested parties on the best ways to provide information, increase engagement, and make best use of public input and will incorporate their recommendations into this participation plan.

Policy 2: SKATS will seek new and better methods of improving the quality of our public participation by learning from examples of other public agencies, attending

seminars and training, and documenting the success of methods used at SKATS.

Policy 3: SKATS will review the Public Participation Plan every four (4) years. If significant changes are proposed, a draft PPP will be prepared and citizens and other interested parties will have 45 days to review and comment on the draft PPP before it is considered by the Policy Committee for adoption.

Policy 4: If, during the 45-day public review, there is a significant revision proposed to the draft PPP, additional time will be added to the review period (up to an additional 45 days) to review and comment on the latest version before it is considered by the Policy Committee for adoption.

GOAL TWO: Full public access and information to key decisions in the regional transportation planning process.

Objective 1: Use the public involvement process to improve transportation plans.

Policy 1: SKATS will encourage citizens to provide new information and articulate priorities.

Policy 2: SKATS will help citizens understand tradeoffs so that they may debate the merits of alternatives.

Policy 3: SKATS will seek public guidance when developing policies, identifying issues and gathering ideas, developing alternatives, setting evaluation criteria, and selecting the most appropriate alternative.

Objective 2: For all major transportation planning activities, make clear for the public the process through which decisions are made and the best times to be involved.

Policy 1: SKATS will identify for the public the key decision makers and their process for reaching decisions.

Policy 2: SKATS will promote more justifiable and sustainable decisions by recognizing and communicating the needs (regulatory, timing, budget, public input) of all participants including decision makers.

Policy 3: SKATS will provide information on the funding sources and constraints that influence and determine many transportation decisions.

Policy 4: Early in the planning process, SKATS will provide an estimated timeline of key decision points and maintain an easily accessed planning calendar throughout the planning process.

Policy 5: SKATS will provide a minimum of 30 days for review of and comment on draft

planning documents (RTSP and amendments, update of the SKATS TIP (occurring approximately every two years) and major amendments to the adopted TIP,) prior to their consideration by the Policy Committee for final adoption.

Policy 6: SKATS will make available on the Mid-Willamette Valley Council of Governments (MWVCOG) website agendas and minutes of SKATS Technical Advisory Committee and SKATS Policy Committee.

GOAL THREE: Widely disseminated, clear, and timely information distributed to the citizens, affected agencies, and interested parties.

Objective 1: Information will be disseminated and gathered through a variety of media.

Policy 1: Methods and media for exchanging information with citizens should be selected based on ease of access, quality of information conveyance, and citizen convenience including email, websites, news media, flyers, brochures, and traditional mailings.

Policy 2: SKATS will develop and use visualization techniques to assist in communicating to the public by the use of maps, charts, tables and display boards, powerpoint presentations, websites, and online use of downloadable maps and interactive maps.

Policy 3: SKATS will use the MWVCOG web page and specialized web pages, as necessary, to publish and make available its plans and studies and to inform the public of opportunities to participate.

Policy 4: SKATS will encourage interested citizens and groups to use their own media outlets for further public outreach.

Objective 2: Transportation planning information will be conveyed in language and in a context that is understandable to the lay citizen.

Policy 1: Acronyms and abbreviations, while convenient shorthand for planners, will be kept to a minimum in information prepared for the public.

Policy 2: SKATS will provide understandable background information to help citizens understand the processes used in transportation planning including links to resources for further inquiry.

Policy 3: SKATS will define the role of regional planning in identifying regional priorities, obtaining federal funding, and facilitating project sharing between jurisdictions.

Objective 3: Public outreach activities that support the planning process will be scheduled to

provide reasonable time for the public to assimilate complex information, thoughtfully respond, and influence the outcome.

Policy 1: SKATS will make accommodations to schedules and processes as needed and practicable to encourage public participation.

Policy 2: SKATS will broadly publicize opportunities for public participation.

GOAL FOUR: Timely and gracious acknowledgement and response to issues, concerns, and comments raised by the public regarding the development and implementation of regional transportation plans, programs, and projects.

Objective 1: *Ensure that the comments from citizens, affected agencies, and other interested parties are considered and incorporated into the deliberations regarding proposed plans and programs.*

Policy 1: SKATS will maintain a readily available record of comments received on the federally required planning documents (RTSP, TIP, and PPP) and responses made. A report on the disposition of comments will be made part of the final documents.

Policy 2: SKATS will provide updated summaries of comments from citizens, agencies, and interested parties to SKATS committees at key decision points in the transportation planning process.

Policy 3: SKATS will provide additional opportunities for review and comment by citizens, agencies, and interested parties if there are significant differences between the draft and final plans.

Policy 4: SKATS will include a visible and easy-to-use link for the public on the MWVCOG website to submit comments, questions, and complaints.

GOAL FIVE: Fully integrate public participation with the regional transportation planning process and coordinate with the other public involvement programs undertaken in the region.

Objective 1: *Coordinate the SKATS public involvement activities with other similar programs in the community to make best use of staff and resources while minimizing public confusion and time demands.*

Policy 1: SKATS will coordinate and, where possible, collaborate with public involvement efforts of other jurisdictions and agencies, particularly those focused on transportation.

Policy 2: SKATS shall acknowledge the public participation work obtained through local transportation planning processes conducted by other jurisdictions and agencies.

Policy 3: SKATS shall continue to notify and invite participation of the Confederate Tribes of the Grand Ronde and Siletz Tribal Council¹ and Federal Lands Management agencies at the onset of the RTSP, TIP, or other major planning activities.

¹There currently are no tribal lands within the MPO; however, there is some land owned by these two tribal councils.

Required Public Participation Components

Background

The specific components identified below are required to be included in the public participation programs for the specified regional transportation planning documents listed. These components were selected based on the following criteria: 1) the degree to which the public indicated they would be useful; 2) the degree to which a given activity achieved the objectives defined for the Public Participation Plan; and 3) the ability and commitment of the region to carry out the particular component given available and expected resources

If additional activities beyond those specifically required in this Plan are found to be appropriate, affordable, and achievable during the conduct of a particular public process, they will be integrated into the Public Participation Plan for that planning activity. Consideration will be given to additional techniques and processes to increase and broaden public participation, especially participation by populations that have traditionally been more difficult to reach (such as those with limited English proficiency, low income communities, etc.)

The Salem Area Mass Transit District (SAMTD) is a recipient of FTA Section 5307 grants, which are available for capital purchases, preventative maintenance, transit enhancements, and operations (under proscribed limits). The public participation requirements for these funds require the following:

1. make available to the public information on the amount of 5307 funds available to the recipient(s);
2. develop, in consultation with interested parties including private transportation providers, a proposed program of projects for activities to be financed;
3. publish a proposed program of projects in a way that affected individuals, private transportation providers, and local elected officials have the opportunity to examine the proposed program and submit comments on the proposed program and the performance of the recipient;
4. provide an opportunity for a public hearing in which to obtain the views of individuals on the proposed program of projects;
5. consider comments and views received on the proposed program (especially those of private transportation providers) in preparing the final program of projects;
6. make the final program of projects available to the public.

The program of projects for Section 5307 funds is developed and coordinated by SAMTD and included in the draft TIP update and included in the public participation of the draft TIP.

1) SKATS Committees and Public Review

- a) Prior to their release for public review and comment, the SKATS Policy Committee (PC) and Technical Advisory Committee (TAC) shall review drafts of the following documents at their regularly scheduled meetings:
 - i) SKATS Public Participation Plan (PPP)
 - ii) SKATS Regional Transportation Systems Plan (RTSP), Major Amendments to the RTSP, and RTSP Air Quality Conformity Determination (AQCD)
 - iii) SKATS Transportation Improvement Program (TIP), TIP Major Amendments, and TIP Air Quality Conformity Determinations (AQCD)
- b) Information on the availability of the above documents and ability for public review and comment shall use one or more of the following methods: existing newsletters, press releases, MWVCOG webpage, and other communication methods and opportunities.
- c) Copies will be available at SKATS offices, distributed to libraries, and posted on the Mid-Willamette Valley Council of Government website (www.mwvcog.org).
- d) At the conclusion of the public review period, the SKATS Policy Committee will receive a written summary of public comments and staff responses.
- e) The Policy Committee will have a public hearing prior to deliberation and adoption of the RTSP, RTSP Major Amendments, RTSP AQCD, TIP, TIP Major Amendments, and TIP AQCD.

2) Public Review Periods

- a) The minimum review period for the Public Participation Plan and its amendments **shall be 45 days**.
- b) The minimum review period for the Regional Transportation Systems Plan (RTSP), RTSP Major Amendments and Updates, and RTSP Air Quality Conformity Determination **shall be 30 days**.
- c) The minimum review period for the Transportation Improvement Program (TIP) and Major Amendments (i.e., excluding TIP Adjustments and TIP Administrative Amendments), and TIP Air Quality Conformity Determinations **shall be 30 days**.

3) Public Participation and Engagement Program

- a) In order to facilitate public participation, SKATS shall develop a public participation and engagement program for the RTSP and TIP updates, corresponding with their 4-year and 2-year update cycle. This program of activities will be used in both the development of the RTSP and TIP and during the formal public review and comment period.

- b) In developing this program, SKATS staff, Technical Advisory Committee, and Policy Committee may identify one or more of the following methods of encouraging and soliciting public participation²:
1. Establishment of a formal Citizens Advisory Committee (CAC) or Citizens Task Force, addition of citizens on the Technical Advisory Committee, or other advisory committee, as needed.
 2. Informational packets/fact sheets, brochures, maps, and other materials that explain the major changes and additions to the RTSP and TIP. Materials to be printed and/or available on the MWVCOG website.
 3. One or more “open houses” for the public to review drafts of the RTSP and TIP.
 4. A series of focused workshops.
 5. Media placements using one or more of the following methods: existing local newspapers and newsletters, press releases, web page, other opportunities.
 6. Informational briefings to councils, commissions, chambers, neighborhood groups, citizen organizations, etc.
 7. Attendance or representation at appropriate public events: materials distributed to general public by request and to other agencies for their distribution.

² See Appendix A for examples of public participation activities and materials used for developing the TIP and recent transportation planning studies.

Appendix A

This appendix lists the public participation activities used for the TIP and recent planning studies to inform and engage the public. These examples document actions and techniques previously used and likely to be used in the future. Going forward, SKATS staff will revise and add other activities depending on their usefulness and value in engaging public participation.

Public Involvement Activities for the FY 12-FY 17 Draft MTIP

- Developed press releases that were sent to all media sources in the Salem-Keizer area. Notice of the open house was listed in the Statesman Journal.
- Developed a full color brochure (in English and Spanish) of projects in the draft TIP and how the public can participate and comment. The brochure was both e-mailed or sent US mail to over 300 persons on our interested parties list, as well as mailed to TAC members for further distribution.
- Information about the Open House and Public Hearing for the TIP included in CCTV's Community billboard and Keizer's K23 station.
- Postcards with Open House information posted at 22 local business and public locations.
- Open house information included on "Breakfast On Bikes" blog.
- Developed an Environmental Justice Analysis of draft TIP.
- Created an online map of the TIP projects available on the MWVCOG website .
- Attended North Lancaster Neighborhood Association meeting (Brown Road was one of the two new projects added to the FY 12-FY 17 TIP).
- Information on TIP and Open House dates and times include in quarterly MWVCOG Newsletter.
- All materials (draft TIP and draft AQCD, online map, brochure in English and Spanish) put on the MWVCOG website including information on special accommodations or translation services and Title VI notice with a link the SKATS' Title VI Complaint Form.
- Open House: January 11, 2012 7:30 a.m. - 10:00 a.m. and 4:00 p.m. – 7:00 p.m.
MWVCOG Conference Room
- TIP Public Hearing: January 24, 2012 at 12 noon CCBI, Room 102, 626 High Street NE, Salem.

Public Participation Activities - Salem Parkway / Kroc Center Access Feasibility Study

- Arranged a **Stakeholder Advisory Committee** of two elected officials (Salem city councilor, Keizer city councilor), Kroc staff representative, transit district representative, school district representative, a local business owner in the study area, bicyclist representatives from Salem and Keizer, neighborhood association representatives, urban renewal board representative, railroad representative, and an ODOT representative.
- Developed a website - www.kroconnections.org - with background and purpose of the study, ways for the public to participate, all meeting agendas and minutes, maps and illustrations of initial concepts and final three alternatives, an online survey, comment form, a blog, and tracking of webpage "hits."
- Conducted a multi-day "intercept survey" at the Salvation Army Kroc Center and at a Keizer Chamber of Commerce Teacher Appreciation Day to get initial public comments on the six initial bridge and pathways concepts. Collected over 130 surveys, and produced survey results for the Stakeholder Advisory Committee.
- Worked with the local newspapers (Statesman Journal, KeizerTimes) which published articles on the study and alternatives the week before the Open House.
- Displayed posters of the alternatives in the Keizer Civic Center lobby area. At that location, the public also had the opportunity to fill out a survey to indicate which alternatives they liked best and why.
- The Salvation Army Kroc Center and Keizer Chamber of Commerce did "e-blasts" to inform their members of the Open House and website.
- Sent information to an individual who writes a blog on transportation issues in Salem and Keizer area. He posted information about the study and later another post about the open house.
- City of Keizer staff produced a short video on the challenges to getting to the Kroc Center with information on the Open House and website. Video was shown on the K23 public access channel and on YouTube.
- Held an Open House at the Claggett Middle School (within the study area) from 4:00 to 6:30. Attendance was about 40 people.
- Produced a project fact sheet and Open House flyer that was distributed.

Appendix B

Resolution 13-3

Resolution Adopting the Public Participation Plan for the Salem-Keizer Area Transportation Study

WHEREAS, the Policy Committee of the Salem-Keizer Area Transportation Study has been designated by the State of Oregon as the official Metropolitan Planning Organization (MPO) for the Salem Urban area; and

WHEREAS, the Policy Committee of the Salem-Keizer Area Transportation Study is authorized by the Cooperative Agreement dated April 6, 1987, and reaffirmed with the adoption of the SKATS Planning Work Program annually, to act on all administrative matters relating to transportation projects; and

WHEREAS, the development of a Public Participation Program is required by the federal surface transportation act (Moving Ahead for Progress in the 21st Century - MAP-21) and federal transportation planning regulations for MPOs (§450.316);

WHEREAS, the Public Participation Plan has completed the required 45-day public review and comment period;

**NOW THEREFORE, BE IT RESOLVED BY THE POLICY COMMITTEE
OF THE SALEM-KEIZER AREA TRANSPORTATION STUDY:**

THAT the Policy Committee hereby adopts the 2013 version of the SKATS Public Participation Plan for the Regional Transportation Planning Process.

ADOPTED by the Policy Committee of the Salem-Keizer Area Transportation Study on the 23rd day April 2013.



Chair
Salem-Keizer Area Transportation Study
Policy Committee

Attachment F: Language Assistance Plan

The following document is a copy of the SAMTD Language Assistance Plan.

Attachment F.

Cherriots Language Assistance Plan 2017

This plan describes the process used by SAMTD for conducting a Limited English proficiency (LEP) needs assessment based on the four-factor framework in Section V of the DOT LEP Guidance. The four-factor analysis will allow SAMTD to be in a better position to implement a cost-effective mix of language assistance measures and to target resources appropriately.

FACTOR 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient

How LEP persons interact with Cherriots

Many of the LEP persons in the urban and rural areas of the SAMTD service areas use the transit system for daily transportation needs. They also call the Customer Service and Cherriots Call Center phone numbers to get information about transit services, especially schedule information. Two Customer Service representatives and two Call Center employees speak fluent Spanish, and for any other language needed, SAMTD contracts with a telephone language translation service, which can handle most communication needs.

Currently, there are no regular attendees to our Board of Director meetings that could be categorized as LEP persons, but if there was an interest by such a group, SAMTD is prepared to provide translation services for any interested person.

SAMTD translates certain portions of the cherriots.org website into Spanish in order to communicate answers to frequently asked questions.

Identification of LEP communities

The boundary for Cherriots, CherryLift, and the RED Line bus services is the Salem-Keizer Urban Growth Boundary. Cherriots Regional serves the rural communities of Marion and Polk counties and two very small towns in Linn County. In addition to the established district boundary, Cherriots also operates two commuter routes. These commuter routes provide service between the Salem-Keizer area and Wilsonville, and between the Salem-Keizer area and central / western Polk

County.

Obtain Census data on the LEP population in the SAMTD service area

Data was gathered from the 2011-2015 American Community Survey (U.S. Census) 5-Year Estimate for Marion and Polk counties and for the Salem Census County Division (CCD), which approximates the area inside the Salem-Keizer UGB. Since the percentages of average LEP populations for the two counties was within one or two percentage points of the Salem CCD, SAMTD will use the values for the counties as a whole. This will ensure that the regional and local services are treated equally. Table 1 displays the numbers below.

Table 1. Data from 2011-2015 American Community Survey for Marion and Polk Counties: Language Spoken at Home by Ability to Speak English for the Population 5 Years Old and Over

Category	Estimate
Total:	443,422
Speaks English "very well"	373,376
Speaks English less than "very well"	35,023
Spanish speaker	29,579
Russian speaker	1,789
Other speakers	3,655
Total for Marion and Polk Counties	408,399
Percent LEP (Marion/Polk Counties)	8.6%

Analysis of the data collected from the 2010 Census and the 2011-15 (five year average) American Community Surveys

Data provided by the 2011-15 American Community Survey 5-Year Estimate above show that more than 1,000 individuals who speak English less than "very well" reside in Marion and Polk Counties. The majority of these LEP persons speak Spanish, and the second highest LEP are Russian speakers. The LEP safe harbor provision states that if 5% or 1,000 individuals are LEP and live in the transit service area, the District must address these populations with additional language assistance including the publication of the Title VI Notice to the Public in those languages. Cherriots has translated and posted its Title VI Notice to the Public in three languages since June 2014. They are posted in all three languages in the local Cherriots, Cherriots Regional, RED Line, and CherryLift vehicles.

Figures 1 and 2 show the concentration of LEP individuals in relation to the area averages. Figure 1 shows the percentage of population considered LEP by U.S. Census block group for Marion and Polk Counties. Figure 2 displays the Percentage of Population considered LEP by U.S. Census block group within the Salem-Keizer Urban Growth Boundary (UGB). The average LEP population is 8.6 percent for Marion and Polk Counties, together.

Following the Department of Transportation's and Department of Justice's Safe Harbor Provision for LEP communications, SAMTD has translated its Title VI Policy statement into Russian since June 2014 due to a large population of LEP Russian speakers in the city of Woodburn who speak English less than "very well," and are served by Cherriots Regional buses.

The Safe Harbor Provision stipulates that, "if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations." The Spanish-speaking LEP group is the largest with approximately 30,000 people, and the Russian-speaking LEP group is the second largest at around 1,800 people.

Figure 1. U.S. Census Block Groups with Greater than Average Limited English Proficiency (LEP) in Marion and Polk Counties, Oregon Compared to the Average LEP rate for the Two Counties (ACS 2011-15, Table B16002)

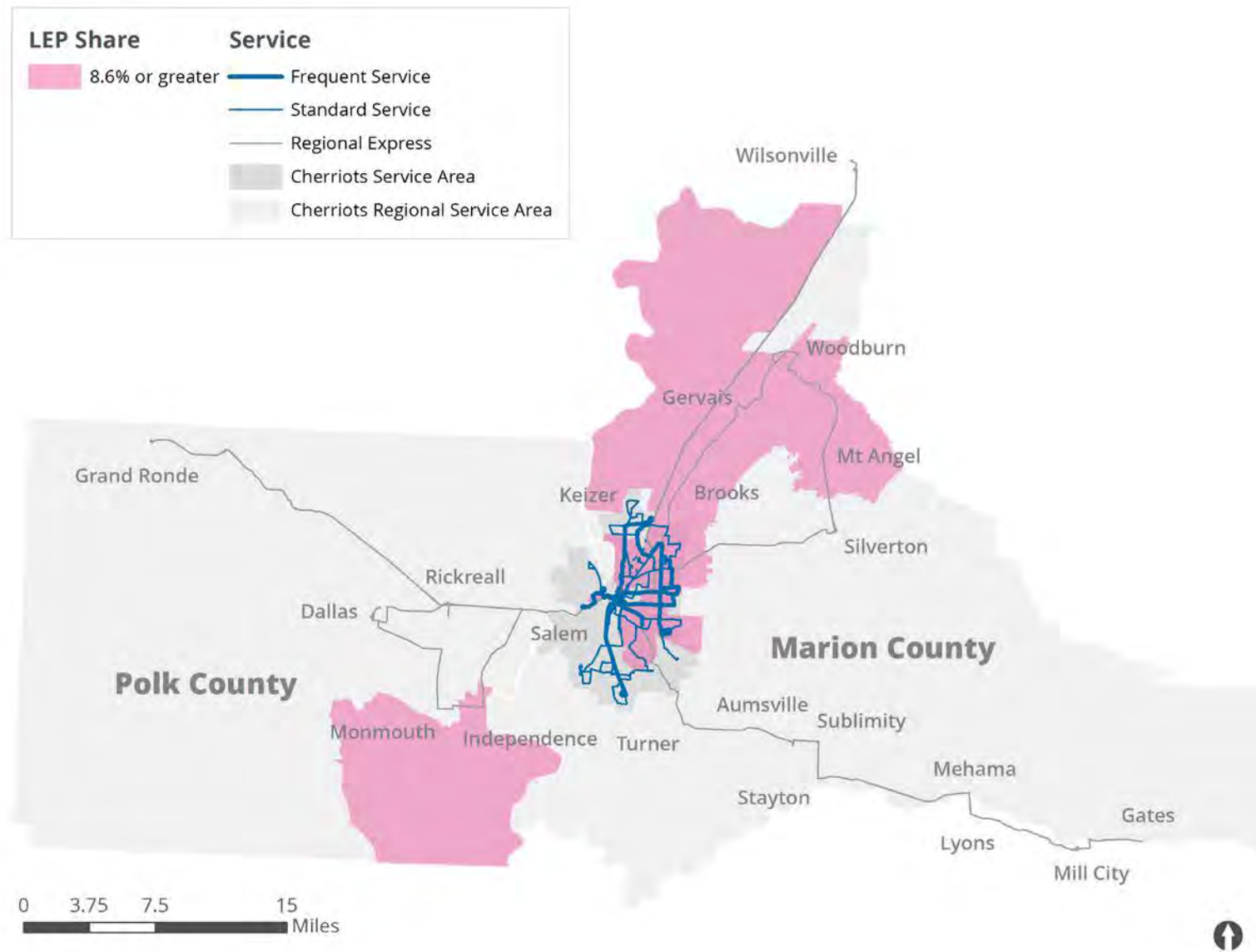
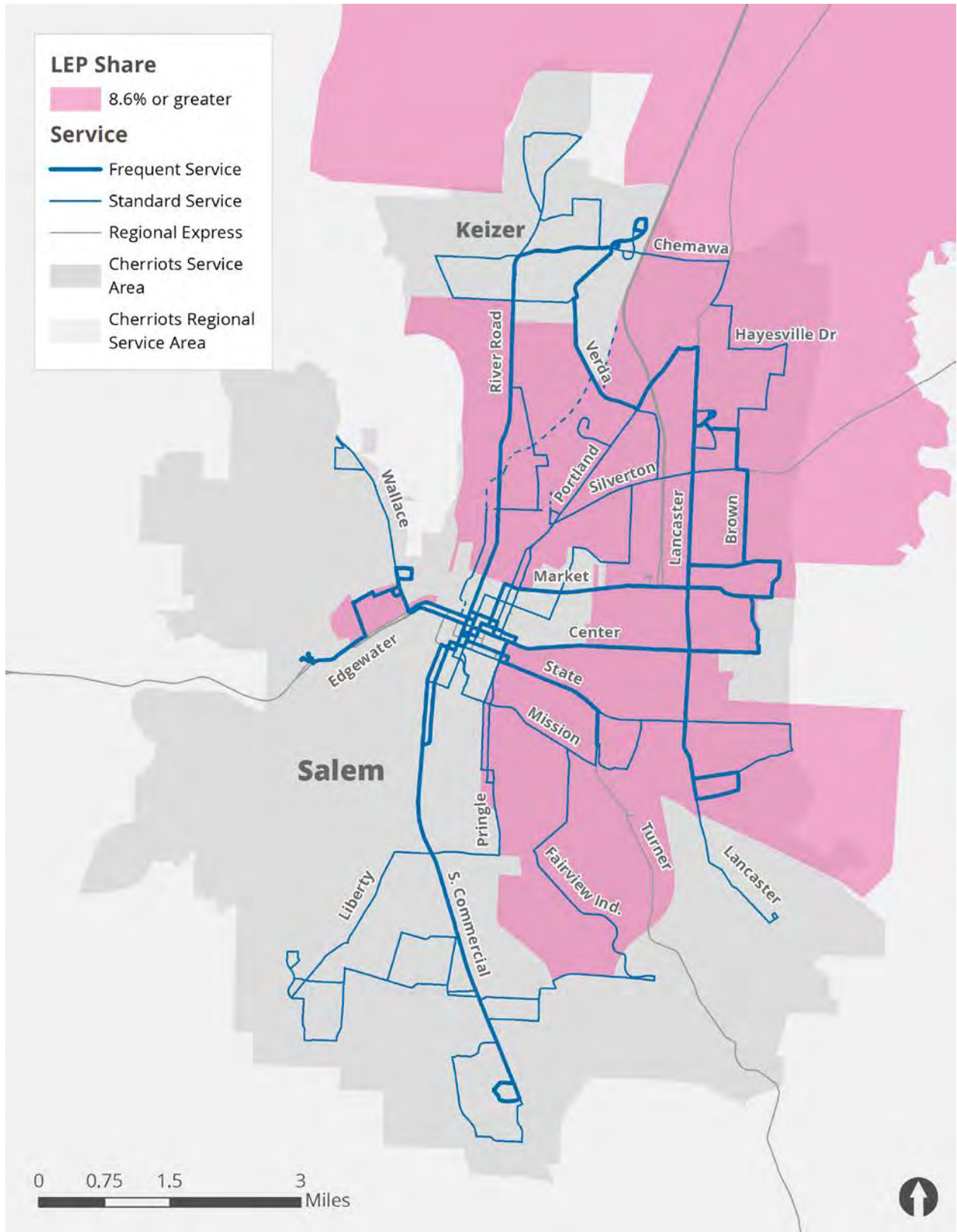


Figure 2. U.S. Census Block Groups with Greater than Average Limited English Proficiency with Bus Routes and Their Associated Frequencies Indicated (ACS 2011-15, Table B16002)



While specific areas within the Salem-Keizer area have higher residential concentrations of LEP populations, the use of the transit system by LEP populations is not limited to the locations of their homes. Employment, medical services, government offices, and shopping opportunities are widespread throughout the community. Based on this information SAMTD has elected to apply assistance to LEP populations with geographic equity.

Compile additional data from state and local sources

Each school district in the State of Oregon has a responsibility to identify those students who are LEP and whose primary language is other than English in order to provide assistance to these students. Newly registered students and parents complete Home Language Surveys that identify the primary language spoken by the student and his or her family. Data provided by the Oregon Department of Education indicates that in the 2014-2015 school year, 20% of Salem-Keizer School District students are current English Language Learners (ELLs) and 12% were former ELLs. In the Woodburn School District, 38% of students are current ELLs and 33% were former ELLs. The other significant LEP district in the Cherriots service area is the Central School District in Independence, Oregon. The Central School District reported 19% of its students as current ELLs and 12% former ELLs.

Based on a statewide formula, the Salem-Keizer School District receives the largest amount of money for ELL programs in the State of Oregon. The Woodburn and Central School Districts are also two of the highest in the state. Therefore, this confirms that there are significant populations of LEP persons in Marion and Polk Counties. See Appendix A for the English Language Learner Annual Report to the Oregon State Legislature, 2016 update.

Determine the literary skills of LEP populations in their native languages

In order to determine whether translation of documents will be an effective practice, the literacy rates of LEP populations in their native languages must be known. Although specific survey data was not collected in this area, a survey of ELL students is performed by the Salem-Keizer School District each year. According to the document found in Appendix A, a survey in 2011-12 found that around 15% of the student population speaks a different language at home. They very often teach their parents English at home as they progress through the ELL program.

A report from the National Center for Education Statistics in 2003 shows a low

literacy rate of somewhere between 7.3 and 25.5 percent (95th percentile accuracy) in Marion County. Polk County had between a 4.5 and 17.6 percent illiteracy rate (95th percentile accuracy). These findings are provided in the documents provided in Appendix B.

Data is hard to find, but it appears from the Salem-Keizer School District programs that literacy in the native language is relatively high (97%). Therefore, any translated documents or public outreach materials should be understandable by the LEP populations in Salem and Keizer.

Identify whether LEP persons are underserved by SAMTD due to language barriers

As shown in Figure 2 above, transit services are provided at relatively high frequencies throughout the U.S. Census Block Groups in the Salem-Keizer urbanized area with above average LEP populations. With the language assistance policy in place, especially for those who speak Spanish, SAMTD believes its services are not underserving the LEP populations in the Cherriots service area. It is possible that SAMTD is not serving the Russian speaking LEP population in the City of Woodburn, and staff is proactively trying to reach out to this community to educate them about the Cherriots Regional services available.

Transit services provided by all of the SAMTD brands (Cherriots, Cherriots Regional, CherryLift, and RED Line) are well-represented in areas of the urban and rural areas where LEP populations live. Frequencies of service in these areas is generally higher than in non- LEP areas due to high demands for service in those areas.

Factor 2: The frequency with which LEP individuals come into contact with SAMTD's programs

Key Services Provided by SAMTD

SAMTD will survey key program areas and assess major points of contact with the public, such as:

- Fixed route public transportation service
- Purchase of bus passes and tickets through Customer Service agents, outlets, and bus operators; currently, SAMTD does not sell tickets or passes via the cherriots.org website, over the phone, or via ticket vending machines
- Commuter service
- Complementary paratransit service
- Travel training
- Cherriots Trip Choice / transportation options
- Participation in public meetings
- Ridership surveys
- Operator surveys

Based on current information provided by transit operators and Customer Service staff the only language other than English that is frequently encountered is Spanish. Very limited encounters occur with individuals that speak only Russian or Vietnamese with these encounters being less than 0.5% for each language.

SAMTD continues to work with local groups within the Spanish speaking community to ensure that program information, program changes, and concerns of the community are clearly communicated. These groups include Mano y Mano and Voz Hispánica. Online surveys in Spanish have also been used to gather input from the Spanish speaking community in the Salem-Keizer area. Even though Russian was identified in 2014 as a common LEP language in the City of Woodburn, not many people are using SAMTD services. The District will continue to outreach to the Russian community in Salem and Woodburn to ensure they are included in public input. To date, a representative organization has not been identified that could assist the District with its outreach efforts to the Russian speaking public. Input from these community organizations and others is critical in maintaining information on how frequently services provided by SAMTD are used by LEP individuals.

Effective Use of Input from Community Groups and LEP Focus Groups

SAMTD will use the following guidance and steps to evaluate specific community group's relevance as a resource for input from various LEP populations.

1. Questions to ask community groups serving LEP persons

The DOT LEP Guidance states that the nature of language assistance an agency provides should be based in part on the number and proportion of LEP persons served by the recipient, the frequency of contact between the recipient and the LEP population, and the importance of the service provided by the recipient to the LEP population.

In order to better analyze these factors, transit agencies are encouraged to consult with community organizations serving LEP persons and ask some or all of the following questions:

- What geographic area does your agency serve?
- How many people does your agency provide services to?
- Has the size of the population you serve increased, stayed the same, or decreased over the past five years?
- What are the countries of origin from which your population has immigrated?
- Does your population come from an urban or rural background?
- What are the languages spoken by the population you serve?
- What is the age and gender of your population?
- What is the education and literacy level of the population you serve?
- What needs or expectations for public services has this population expressed?
- Has the population inquired about how to access public transportation or expressed a need for public transportation service?
- What are the most frequently traveled destinations?
- Are there locations that the population has expressed difficulty accessing via the public transportation system?
- Do the transit needs and travel patterns of the population vary depending on the age or gender of the population members?
- What is the best way to obtain input from the population?
- Who would the population trust most in delivering language appropriate messages?

2. LEP survey/focus group questions

Transit agencies implementing the four-factor analysis described in the DOT LEP Guidance are encouraged to consult directly with LEP persons to determine how frequently these persons use the agency's service and the importance of the service to LEP persons.

Section II of this handbook recommends that agencies gather input from LEP persons using focus groups and surveys. Agencies using these methods should consider asking some or all of the following questions:

- Do you use public transportation?

If a person answers "yes," ask the following questions:

- How often do you use public transportation?
- What kinds of public transportation do you use— Cherrits buses, CherryLift service, Cherrits Regional buses, other buses?
- When do you use public transportation? For what purpose?
- Are you satisfied with the transportation you use?
- Do you have any suggestions how the people who run the transportation services could improve it to make it work better for you? Please be as specific as you can.

If a person answers "no" to the first question, ask the following questions:

- How do you travel if you have to go somewhere in your area?
- Would you use public transportation if the trains or buses were set up differently?
- If the person answers "yes," to this question, then ask:
- Which transit systems would you use?
- How can the people who run that system improve it to make it work better for you?

When possible, survey or focus group questions should be provided to advocacy groups and other interested organizations so that they may provide feedback on the instrument and offer additional suggestions.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives

The Salem-Keizer area has a high number (29.4%) of overall households that are below 150% of the Federal Poverty Level (FPL). As shown in Figures 3 and 4 below, a significant number of these households are occupied by individuals with LEP. The availability of public transportation is especially important for these individuals to access employment, medical services, public assistance, and shopping opportunities. For populations that face these socio-economic challenges it is critical that information on the services available, how to use the services, potential changes to services, safety and security notices, and opportunities to be involved in the public participation process be made available in a language and literacy level that is understandable by the majority of individuals dependent on the services offered by Cherriots.

Figure 3. U.S. Census Block Groups with Greater than Regional Average Percentages of Population Living Below 150 Percent of the Federal Poverty Level Within the Salem-Keizer Urban Growth Boundary (ACS 2011-2015, Table C17002)

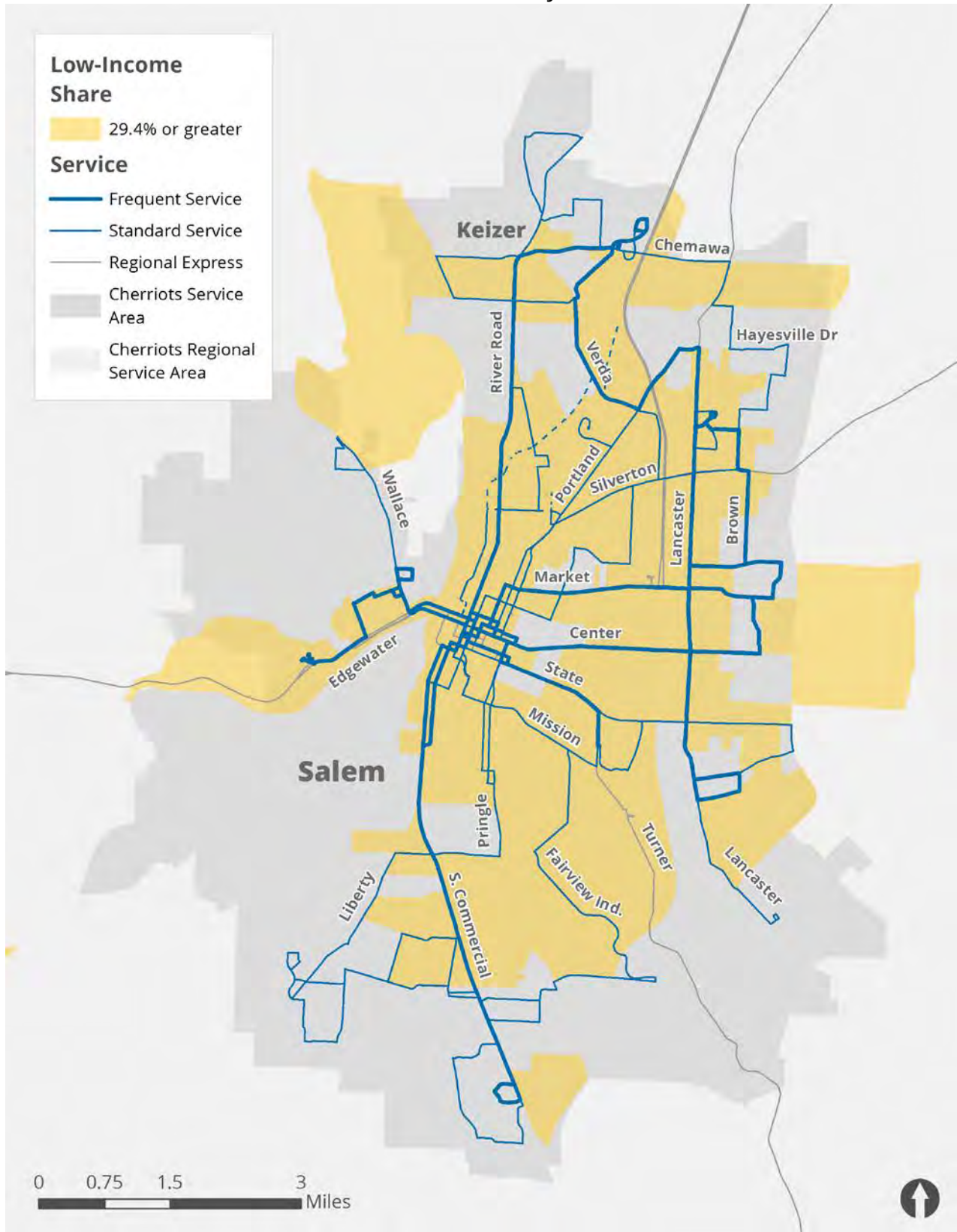
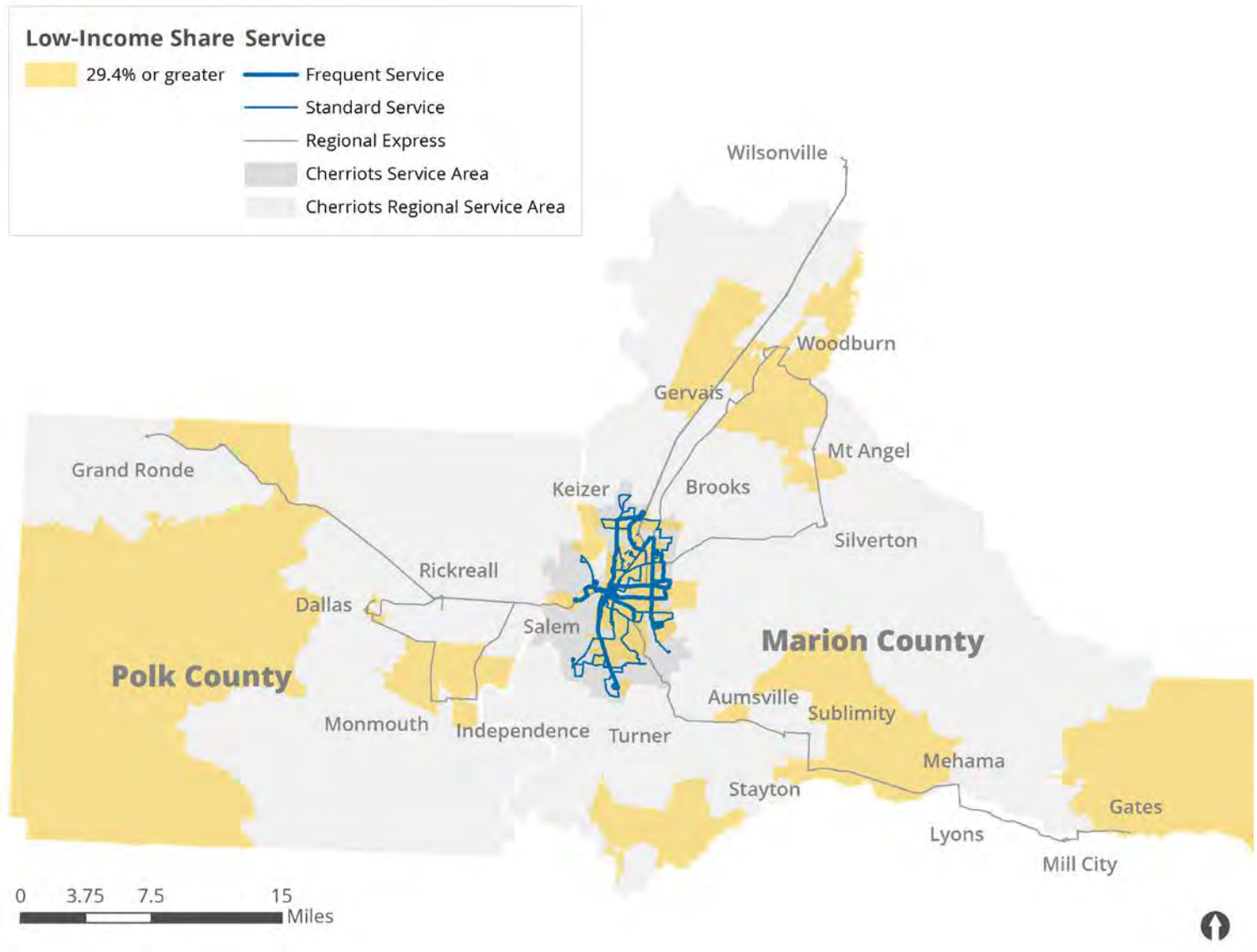


Figure 4. U.S. Census Block Groups with Greater than Regional Average Percentages of Population Living Below 150 Percent of the Federal Poverty Level in Marion and Polk Counties (ACS 2011-2015, Table C17002)



Language Assistance Monitoring Checklist

In order to assure comprehensive coverage of all programs offered by SAMTD, periodic monitoring of language assistance measures that have been implemented can help determine if assistance is being provided competently and effectively. SAMTD will use the following checklist to monitor services. Depending on the language assistance provided, the following questions could be answered by periodic monitoring:

Stops and Shelters

- ___ Are translated instructions on how to make fare payments available?
- ___ Are translated schedules, route maps, or information on how to use the system available?
- ___ Has the information been placed in a visible location?
- ___ How many units of the material have been distributed?
- ___ If such information is available, is Customer Service staff aware that they have this information?
- ___ Are announcements audible?
- ___ Are any announcements, such as security awareness announcements, made in languages other than English?
- ___ Do transit stops and transit centers display information or instructions using pictographs?
- ___ Can a person who speaks limited English or another language receive assistance from a Customer Service staff member when asking for directions?
How is this assistance provided?

Vehicles

- ___ Are translated instructions on how to make fare payments available?
- ___ Are translated schedules, route maps, or information on how to use the system available?
- ___ Has the information been placed in a visible location?
- ___ How many units of the material have been distributed?
- ___ If such information is available, are vehicle operators aware that they have this information?
- ___ Are announcements audible?
- ___ Are any announcements, such as security awareness announcements, made in languages other than English?
- ___ Can a person who speaks limited English or another language receive assistance from a bus operator when asking about the destination of the vehicle? How is this assistance provided?

Customer Service

- ___ Is the Customer Service telephone line equipped to handle callers speaking languages other than English?
- ___ Can Customer Service representatives describe to a caller what language assistance the agency provides and how to obtain translated information or oral interpretation?
- ___ Can a person speaking limited English or a language other than English request information from a Customer Service representative?

Community Outreach

- ___ Are translators available for community meetings?

___ Are translated versions of any written materials that are handed out at a meeting provided upon request?

___ Can members of the public provide oral as well as written comments?

Press/Public Relations

___ Are meeting notices, press releases, and public service announcements translated into languages other than English?

___ Does the agency website have a link to translated information on its home page?

Current Communication Methods Used by SAMTD

SAMTD typically communicates to the public through one or more of the following methods:

- Signs and “take-one” handouts available in vehicles and at the Downtown Transit Center
- Announcements in vehicles and at the Downtown Transit Center
- The Cherriots and Cherriots Trip Choice websites
- Customer service lobby
- Press releases
- Newspaper advertisements
- Announcements and community meetings
- Information tables at local events

Factor 4: The resources available to SAMTD for LEP outreach, as well as the costs associated with that outreach

Internal considerations and training will focus on:

1. A list of what written and oral language assistance products and methods the district has implemented and how SAMTD staff can obtain those services;
2. Instructions to Customer Service staff and other SAMTD staff who regularly take phone calls from the general public on how to respond to an LEP caller. (Ideally, the call taker will be able to forward the caller to a language line or to an in-house interpreter who can provide assistance);
3. Instructions to Customer Service staff and others who regularly respond to written communication from the public on how to respond to written communication from an LEP person. (Ideally, the SAMTD staff person will be able to forward the correspondence to a translator who can translate the document into English and translate SAMTD's response into the native language);
4. Instructions to vehicle operators, Operations Supervisors, and others who regularly interact with the public on how to respond to an LEP customer;
5. Policies on how SAMTD will ensure the competency of interpreters and translation services. Such policies could include the following provisions:
 - SAMTD will ask the interpreter or translator to demonstrate that he or she can communicate or translate information accurately in both English and the other language;
 - SAMTD will train the interpreter or translator in specialized terms and concepts associated with SAMTD's policies and activities;
 - SAMTD will instruct the interpreter or translator that he or she should not deviate into a role as counselor, legal advisor, or any other role

aside from interpreting or translator;

- SAMTD will ask the interpreter or translator to attest that he or she does not have a conflict of interest on the issues that they would be providing interpretation services.

The current resources utilized include print translation services for all significant languages represented in the area, telephone translation services for all languages that represent the majority of individuals that speak English “less than very well” or “not at all”, and in person translation for public meetings for primary dominant language groups in the area.

In addition to these resources, a limited number of staff are bilingual in English and Spanish. These include Customer Service staff and transit operators.

Determine what, if any, additional services are needed to provide meaningful access

While there are adequate resources for translating phone conversations, print materials, media releases, and translators for public meetings, additional English / Spanish bi-lingual staff would increase the number of staff available for conversations between individuals who speak Spanish and SAMTD staff. Additional training is needed to address the stated area of need.

Budgeting for Translation Services and Staff Training

The SAMTD annual budget always includes an amount for print and telephone translation services as well as the services of interpreters for in-person meetings where LEP individuals may be present. Phone services are provided for a variety of languages, including all significant language groups in the SAMTD service area.

Print translations are also provided by an outside service. While the cost is somewhat high, the volume of translations annually does not support the need for in-house translation staff positions.

Audio messages are completed by staff who are bilingual in English and Spanish.

Additional Resources to Sustain Ongoing Development of LEP Program

Additional resources can be found in Appendix C.

Attachment G: Title VI Policies

The following documents are the official SAMTD Title VI Policies incorporated into the 2017 Title VI Program Update:

Policy #104 – LANGUAGE ASSISTANCE

Policy #108 – PUBLIC PARTICIPATION PROCESS FOR PROPOSED FARE INCREASES
AND/OR TRANSIT SERVICE REDUCTIONS

Policy #703 – NON-ELECTED COMMITTEE MINORITY PARTICIPATION
ENCOURAGEMENT

Policy #704 – SUBRECIPIENT TITLE VI PROGRAM MONITORING

Policy #705 – SYSTEMWIDE SERVICE STANDARDS

Policy #706 – SYSTEMWIDE SERVICE POLICIES

Policy #707 – MAJOR SERVICE CHANGES

Policy #708 – DISPARATE IMPACT FOR SERVICE CHANGES

Policy #709 – DISPROPORTIONATE BURDEN FOR SERVICE CHANGES

Policy #710 – FARE CHANGES

Policy #711 – DISPARATE IMPACT FOR FARE CHANGES

Policy #712 – DISPROPORTIONATE BURDEN FOR FARE CHANGES

Policy:	PUBLIC PARTICIPATION PROCESS FOR PROPOSED FARE INCREASES AND/OR TRANSIT SERVICE REDUCTIONS	Number: 108
Resolution #13-11 adopted by the SAMTD Board of Directors on 10/24/13; revised by Resolution #2017-04 adopted on 05-25-17.	Effective Date: 05/25/17	Page 1 of 3

108.01 PURPOSE

This policy should apply to the institution of proposed reduction in transit services or increase in fares.

108.02 APPLICATION

All matters related to guide the management of reductions in transit service and increases in fares as is required by Federal regulations contained in 49 USC §5307 (c)(1)(i).

108.03 DEFINITIONS**Service Reduction:**

1. A reduction in service defined by Policy #701 "Major Service Change" of:
 - a. 15 percent or more of the number of transit route miles based on the miles of an average round-trip of the route (this includes routing changes where route miles are neither increased nor reduced (i.e., re-routes)), or;
 - b. 15 percent or more of a route's frequency of the service (defined as the average hourly frequency throughout one service day for local fixed routes and as daily round trips for regional express routes) on a daily basis for the day of the week for which a change is made or;
 - c. 15 percent in the span (hours) of a route's revenue service (defined as the time between the first served stop of the day and the last stop), on a daily basis for the day of the week for which a change is made;
2. A transit route split where either of the new routes meet any of the above thresholds when compared to the corresponding piece of the former route.

Policy:	PUBLIC PARTICIPATION PROCESS FOR PROPOSED FARE INCREASES AND/OR TRANSIT SERVICE REDUCTIONS	Number: 108
Resolution #13-11 adopted by the SAMTD Board of Directors on 10/24/13; revised by Resolution #2017-04 adopted on 05-25-17.	Effective Date: 05/25/17	Page 2 of 3

3. A Major Service Change occurs whether the above thresholds are met:
 - a. Within a single service proposal, or;
 - b. Due to a cumulative effect of routing, frequency, or span changes over the year prior to the analysis.

Fare Increase:

An increase in any cash fare or in the cost of any passes, tickets, transfers, or other means by which transit riders pay for their trips.

108.04 GENERAL RULE**A. Public Hearing Requirements:**

1. SAMTD shall hold a public hearing when any Major Service Change proposed that results in a decrease in service or for any proposed increase in fares. Notice must be published in a general circulation newspaper. In addition, notice will be placed in newspapers, publications, or websites that are oriented to specific groups or neighborhoods that may be affected by the proposed Major Service Change. The notice must be published at least 30 days prior to the hearing. The notice must contain a description of the proposed service reduction, and the date, time, and place of the hearing.

B. Implementation of Changes:

1. No transit service reduction or fare increase shall be instituted until: after a public hearing is held; after consideration to views and comments expressed in the hearing is given; and, after consideration as to the effect on minority populations of the proposed service reduction. All changes in service meeting the definition of "Major Service Change" are subject to a Disparate Impact Analysis prior to Board approval of the service change. A

<p>Policy:</p>	<p>PUBLIC PARTICIPATION PROCESS FOR PROPOSED FARE INCREASES AND/OR TRANSIT SERVICE REDUCTIONS</p>	<p>Number: 108</p>
<p>Resolution #13-11 adopted by the SAMTD Board of Directors on 10/24/13; revised by Resolution #2017-04 adopted on 05-25-17.</p>	<p>Effective Date: 05/25/17</p>	<p>Page 3 of 3</p>

Disparate Impact Analysis will be completed for all Major Service Changes and will be presented to the SAMTD Board for its consideration and included in the subsequent SAMTD Title VI Program report with a record of action taken by the Board.

108.05 EXCEPTIONS

There may be exceptions to the above policies for seasonal variations in service, in emergency situations, or for experimental reduction of service or increases in fares. Any exception made by the District shall be guided by the Federal regulations contained in 49 USC §5307 (c)(1)(i).

Adopted by:

Date:

President, SAMTD Board of Directors / General Manager

Policy:	LANGUAGE ASSISTANCE	Number: 104
Adopted by the SAMTD Board of Directors on 07/24/03; revised by Resolution #2017-04 adopted on 05-25-17.	Effective Date: 05/25/17	Page 1 of 5

104.01 PURPOSE

To set clear guidelines that ensure maximum access to information about Cherriots' services and to remove barriers that may result from language differences.

104.02 APPLICATION

All matters related to guide how District Officers and staff provide language assistance as is required by Federal regulations contained in 49 USC §5307 (c)(1)(i), Title VI of the Civil Rights Act of 1964, 42 USC §2000d et seq, Federal Transit Laws, 49 USC 53, 49 CFR §1.51, and 49 CFR part 21. See FTA circular 4702.1B dated October 1, 2012 for details.

104.03 GUIDELINES**A. Language Assistance Determinations**

1. The District shall, as part of its Title VI Program update process (every three years), review minority population percentages within Marion and Polk Counties, as well as percentage of minority ridership on Cherriots local fixed route and regional express buses.
2. If, in the process of such reviews, a specific non-English-speaking minority population exceeds five percent or 1,000 individuals, whichever is less, of the total Marion and Polk County population, or five percent or 1,000 individuals, whichever is less, of total system ridership, staff shall prepare a report to the Board denoting this information and defining a language assistance plan that evaluates the need for translation and communication improvements, and describes a program to address that need.
3. The Federal Transit Administration's (FTA) Safe Harbor Provision stipulates that, "if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of

Policy:	LANGUAGE ASSISTANCE	Number: 104
Adopted by the SAMTD Board of Directors on 07/24/03; revised by Resolution #2017-04 adopted on 05-25-17.	Effective Date: 05/25/17	Page 2 of 5

compliance with the recipient's written translation obligations."

4. A biannual rider survey could be one way to inform the District of the riders' ability to speak English.
5. At present, the Spanish and Russian-speaking communities are the only populations exceeding the five percent or 1,000 individuals threshold noted above.
6. SAMTD must address the Spanish and Russian populations with additional language assistance including the publication of the Title VI Notice to the Public in these languages.

B. Contact List

1. The District shall develop and maintain Spanish and Russian language contact lists, including the primary Spanish and Russian language print and airwave media and community organizations that serve Hispanic / Latino and Russian persons within Marion and Polk Counties.

C. Marketing Programs

1. Marketing materials that are educational or informative in nature shall be prepared and made available in Spanish. Cherriots Regional marketing materials shall be made in English, Spanish and Russian languages. Examples of this type of material include system maps, route schedules, flyers, email newsletters, and service advisories.
2. Marketing materials that simply present a slogan or a graphic image, and do not have any informative content, do not as a matter of policy need to be duplicated in Spanish or Russian languages. The standard to determine if a translation is needed should be based upon whether or not the information presented in the marketing piece is necessary to understand how to use the Cherriots system or

Policy:	LANGUAGE ASSISTANCE	Number: 104
Adopted by the SAMTD Board of Directors on 07/24/03; revised by Resolution #2017-04 adopted on 05-25-17.	Effective Date: 05/25/17	Page 3 of 5

to take advantage of opportunities presented by the system. Marketing pieces which would not normally be produced in a Spanish or Russian language version might include some simple posters, exterior bus ads, bus passes, collateral items such as pass holders or key chains, or schedule information which is limited to times and street names.

3. Ads produced for cable TV marketing are not required to be prepared in Spanish or Russian language versions. However, for programs that offer benefits to riders, cable TV spots shall contain a tag line or graphic, in Spanish and Russian, which tells where to find Spanish and Russian language information about the program and its benefits.
4. If the District chooses to prepare specific Spanish or Russian language marketing programs, nothing in these policies should be interpreted to limit the media that may be used to reach the Hispanic / Latino and Russian-speaking audiences.

D. Planning Activities

1. The District's planning activities include route and schedule analysis, system evaluation, ridership studies and analysis, and strategic planning. On occasion, public forums or hearings are conducted to invite input on these kinds of topics from persons in the District area. Legal notices and public hearing or forum notices on such planning meetings, and any news releases on such topics, will be distributed to Spanish and Russian language media on the required contact list.
2. The District should provide an English-Spanish and/or English-Russian interpreters, if staff is available, for public planning meetings and forums. An interpreter shall be made available for all legally-required public hearings.
3. Notice will be provided to media on the District's Spanish and

Policy:	LANGUAGE ASSISTANCE	Number: 104
Adopted by the SAMTD Board of Directors on 07/24/03; revised by Resolution #2017-04 adopted on 05-25-17.	Effective Date: 05/25/17	Page 4 of 5

Russian language contact lists of all federally required planning activities which require public input.

E. Administrative Functions

1. In the conduct of the District's responsibilities, there are a number of statutory and administrative functions that require effective communications with the residents of the District. Such communications must be accessible to Spanish and Russian speaking persons.
2. District regulations and public codes of conduct shall be prepared and made available in Spanish and Russian language versions. Additionally, any legal notice that is distributed and is of interest to the general population shall be sent to the Spanish and Russian language media contact list.
3. All District job announcements, invitations for bid, and requests for proposal shall be distributed to the Spanish and Russian language media contacts. Board meeting announcements and agendas will also be sent to Spanish and Russian language media contacts. Additionally, Board agendas shall include written instructions in Spanish and Russian on meeting procedures and how to provide public comment at Board meetings and hearings.
4. An English-Spanish and/or English-Russian interpreter(s) should be made available at all publicly-noticed District Board meetings.
5. The District's web page shall include information in Spanish and Russian. A Spanish link shall include material on fares and riding regulations, how to use the Cherriots system, facilities and services available to Cherriots riders, and how to access more detailed information in Spanish and Russian.

Policy:	LANGUAGE ASSISTANCE	Number: 104
Adopted by the SAMTD Board of Directors on 07/24/03; revised by Resolution #2017-04 adopted on 05-25-17.	Effective Date: 05/25/17	Page 5 of 5

F. Assistance in Other Languages

1. The District is aware that there are a number of languages spoken within the area, including other Indo-European tongues, Chinese, Vietnamese, and other Asian and Pacific Island languages. An analysis of the 2011-15 American Community Survey five year estimate (U.S. Census) data indicates that the Hispanic population represents 25 percent of Marion and Polk County residents. Seven percent (29,600 individuals) of the Limited English Proficient (LEP) population speaks Spanish and 0.4 percent (1,800 individuals) speak Russian. All other LEP persons total 1.1 percent of the Marion and Polk Counties population.
2. In its customer service functions, the District will retain telephonic language assistance services from a professional translating service, to provide customer service and information in multiple languages.
3. The District may choose to target information or marketing materials to selected minority groups in the area, in languages other than English, Spanish, and Russian.

Adopted by:

Date:

President, SAMTD Board of Directors / General Manager

Policy:	Non-Elected Committee Minority Participation Encouragement Policy	Number: 703
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Revised: 05/25/17	Page 1 of 2

703.01 APPLICATION

All matters related to guide the management of non-elected committee member applications as is required by Federal regulations contained in 49 USC §5307 (c)(1)(i), Title VI of the Civil Rights Act of 1964, 42 USC §2000d et seq, Federal Transit Laws, 49 USC 53, 49 CFR §1.51, and 49 CFR part 21. See FTA circular 4702.1B dated October 1, 2012 for details.

703.02 PURPOSE

The purpose of this policy is to help the District understand the needs of our minority populations and to comply with Title VI rules and regulations.

703.03 DEFINITIONS

A. Non-elected Committee:

1. One of the following committees which the members are approved by the Board of Directors instead of being elected in a public election:
 - a. Budget Committee
 - b. Citizen’s Advisory Committee
 - c. Special Transportation Fund Advisory Committee

703.04 GENERAL RULE

Applications for membership in all non-elected committees must openly welcome applications from people of all races, colors, and national origins, and shall be revised to state this explicit invitation.

Policy:	Non-Elected Committee Minority Participation Encouragement Policy	Number: 703
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Revised: 05/25/17	Page 2 of 2

703.05 EXCEPTIONS

There are no exceptions to this policy.

Approved By:

General Manager

Effective Date

Policy:	Subrecipient Title VI Program Monitoring Policy	Number: 704
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective Date: 05/25/17	Page 1 of 3

704.01 APPLICATION

All matters related to guide the management of monitoring the Title VI Programs of Subrecipients as is required by Federal regulations contained in 49 USC §5307 (c)(1)(i), Title VI of the Civil Rights Act of 1964, 42 USC §2000d et seq, Federal Transit Laws, 49 USC 53, 49 CFR §1.51, and 49 CFR part 21. See FTA circular 4702.1B dated October 1, 2012 for details.

704.02 PURPOSE

The purpose of this policy is to require the District to monitor its Subrecipients Title VI programs, to provide assistance to these smaller organizations, and to comply with Title VI rules and regulations.

704.03 DEFINITIONS

A. Recipient:

1. Any public or private entity that receives Federal financial assistance from the Federal Transit Administration (FTA), whether directly from FTA or indirectly through a primary recipient. This term includes Subrecipients, direct recipients, designated recipients, and primary recipients. The term does not include any ultimate beneficiary under any such assistance program.

B. Subrecipient:

1. An entity that receives Federal financial assistance from FTA through a primary recipient.

Policy:	Subrecipient Title VI Program Monitoring Policy	Number: 704
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective Date: 05/25/17	Page 2 of 3

C. Title VI Program:

1. A document developed by an FTA recipient to demonstrate how the recipient is complying with Title VI requirements. Direct and primary recipients must submit their Title VI Programs to FTA every three years. The Title VI Program must be approved by the recipient’s board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA.

D. Transit Provider:

1. Any entity that operates public transportation service, and includes states, local and regional entities, and public and private entities. This term is inclusive of direct recipients, primary recipients, designated recipients, and Subrecipients that provide fixed route public transportation service.

E. Transit Equity:

1. SAMTD defines Transit Equity as:
 - a. Policies that promote the equitable distribution of burdens and benefits
 - b. Promoting equal access to resources and services
 - c. Engaging transit-dependent riders in meaningful planning and decision-making processes

704.04

GENERAL RULE

Subrecipients of Federal funds who are transit providers shall be monitored for compliance with current Title VI regulations. Technical assistance shall be provided to these smaller organizations to ensure

Policy:	Subrecipient Title VI Program Monitoring Policy	Number: 704
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective Date: 05/25/17	Page 3 of 3

compliance because if the Subrecipient is out of compliance, SAMTD will be out of compliance and therefore ineligible to receive Federal funds. Subrecipients shall be required to submit their Title VI programs to SAMTD every three years or whenever changes or amendments are added by April 30 beginning April 30, 2014. The programs shall address the general reporting requirements noted in Chapter III of FTA circular 4702.1B. SAMTD staff will perform an annual inspection of Subrecipients complaint records and shall be notified if any lawsuit is filed against the Subrecipient that relates to discrimination based on race, color, or national origin. The annual inspection may include a site visit and an inspection of the Subrecipients vehicles, operations centers, customer service areas, etc.

704.05 EXCEPTIONS

There are no exceptions to this policy

Approved By:

 General Manager

 Effective Date

Policy:	System-wide Service Standards	Number: 705
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective Date: 05/25/17	Page 1 of 6

705.01 APPLICATION

All matters related to guide the management of system-wide service standards as is required by Federal regulations contained in 49 USC §5307 (c)(1)(i), Title VI of the Civil Rights Act of 1964, 42 USC §2000d et seq, Federal Transit Laws, 49 USC 53, 49 CFR §1.51, and 49 CFR part 21. See FTA circular 4702.1B dated October 1, 2012 for details.

705.02 PURPOSE

The purpose of this policy is to require the District to establish and maintain certain system-wide service standards, and to comply with Title VI rules and regulations.

705.03 DEFINITIONS

A. Service Standard:

1. A set of service indicators for measuring performance or accessibility traits of the transit network. These indicators include the following:
 - a. Vehicle load
 - b. Vehicle headway
 - c. On-time performance
 - d. Service availability

705.04 GENERAL RULE

A. Requirement to Establish Service Standards:

1. Title VI regulations require transit operators to develop a set of service standards and policies, designed and implemented to help assure that federally-funded transit services are provided in a manner that ensures that no person 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 from the Federal Transit Administration. FTA circular 4702.1B suggests four service

Policy:	System-wide Service Standards	Number: 705
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective Date: 05/25/17	Page 2 of 6

indicators as significant for monitoring public transit’s compliance with Title VI, and recommends that policies and standards be developed for these indicators.

B. Title VI Indicators:

1. Vehicle load

- a. SAMTD will assign a sufficient sized vehicle, or frequency of vehicles, to routes in a manner that will minimize overcrowding of buses through all portions of the SAMTD service area.
- b. Additional service will be considered when load levels routinely exceed 1.5 times the seated capacity of the vehicle for local fixed routes and 1.0 times the seated capacity for regional express routes. Additional service will be considered when customers must routinely stand longer than 20 minutes on an individual trip.
- c. Transit operators are required to radio dispatch if they have a full load and must pass up anyone. SAMTD considers a full bus to have a load factor of 1.5 for local fixed route service and 1.0 for regional express service. This load standard does not apply to special event service or shuttles.

2. Service Frequency

a. Service Day Periods

Distinct route structures and frequencies may be provided during different time periods of the service day. Where possible, route structures should remain consistent between time periods to promote usability and clarity. The service day may contain three separate periods of time:

Policy:	System-wide Service Standards	Number: 705
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1. Daytime service - 5:00 a.m. - 7:00 p.m.
2. Evening service - 7:00 p.m. - 11:00 p.m.
3. Night service - 11 p.m. - 5:00 a.m.

b. Service Day Types

Distinct route structures and frequencies may be provided during different types of service days. Where possible, route structures should remain consistent to promote usability and clarity. The three types of service days may include: Weekday, Saturday, Sunday or Holiday service.

c. Consistent Frequency

Transit service will be deployed where it will provide the greatest use to the most people for access to the most activities and jobs. As one of the strongest drivers for high ridership, where possible and practical, route frequency should remain consistent throughout the service day period.

d. Route Types

SAMTD will maintain four types of routes, generally aligned with the frequency of service provided:

1. **15-minute frequency (4 trips per hour)** - Often referred to as Corridor service, 15-minute frequency routes provide reliable, frequent service along corridors. 15-minute frequency routes should be deployed with an expectation of relative high ridership, above 25 boardings per revenue hour.
2. **30-minute frequency (2 trips per hour)** - Often referred to as Connector service, 30-minute

Policy:	System-wide Service Standards	Number: 705
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective Date: 05/25/17	Page 4 of 6

frequency routes provide reliable connectivity to Transit Centers or to 15-minute frequency routes. 30-minute frequency routes should be deployed with an expectation of moderately high ridership, above 20 boardings per revenue hour.

3. **60-minute frequency (1 trip per hour)** - Often referred to as Circulator or Coverage service, 60-minute frequency routes provide service coverage over large areas and provide critical life-line connectivity to many sections of the community. 60-minute frequency routes should be deployed with an expectation of moderate ridership, above 10 boardings per revenue hour.

4. **Commuter/Tripper (various)** - Commuter and tripper routes provide connectivity to a specific, remote location or provide service at particular times when significant travel demand is expected. Commuter/Tripper routes typically have few trips throughout the day. Commuter/Tripper routes should be deployed with an expectation of moderately high ridership, above 20 boardings per revenue hour.

3. On-time Performance

90% of buses will arrive no later than four minutes after their scheduled end-of-trip arrival time. 100% of buses will not depart before their scheduled start-of-trip departure time. 90% of buses will depart within four minutes of their scheduled start-of-trip departure time.

Policy:	System-wide Service Standards	Number: 705
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective Date: 05/25/17	Page 5 of 6

The number of missed trips will be less than 0.5% of total scheduled trips. Road calls will occur less frequently than every 4,000 vehicle miles.

4. Service Availability

In the urban area, 75 percent of revenue hours will be deployed with a focus on increasing ridership, predominantly on high demand corridors. This service will include 15-minute frequency routes, commuter/tripper routes, and limited 30-minute frequency routes which are expected to provide overall high ridership. The remaining 25 percent of urban revenue hours will be allocated to service which provides needed coverage throughout the community without consideration for expected boardings per revenue hour. This service will predominantly include 60-minute and 30-minute frequency routes. An entire route or individual segments of a route may be classified as either Ridership or Coverage focused.

90% of the residents within the Salem-Keizer UGB should have transit service along a major arterial, minor arterial, or collector serving their residential area; in areas where service can't come within one-half mile of the residential area, a park and ride lot should be available on the route closest to the unserved area.

Policy:	System-wide Service Standards	Number: 705
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective Date: 05/25/17	Page 6 of 6

705.05 EXCEPTIONS

There are no exceptions to this policy.

Approved By:

General Manager

Effective Date

Policy:	Systemwide Service Policies	Number: 706
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective Date: 05/25/17	Page 1 of 3

706.01 APPLICATION

All matters related to guide the management of systemwide service policies as is required by Federal regulations contained in 49 USC §5307 (c)(1)(i), Title VI of the Civil Rights Act of 1964, 42 USC §2000d et seq, Federal Transit Laws, 49 USC 53, 49 CFR §1.51, and 49 CFR part 21. See FTA circular 4702.1B dated October 1, 2012 for details.

706.02 PURPOSE

The purpose of this policy is to require the District to establish and maintain service policies and to comply with Title VI rules and regulations.

706.03 DEFINITIONS

A. Service policy:

1. A policy governing the planning of transit within the District's service area. The policies detailed as part of policy #706 pertain to vehicle assignment and distribution of transit amenities.

706.04 GENERAL RULE

- A.** The two policies pertain to vehicle assignment and distribution of transit amenities and are detailed below:

Policy:	System-wide Service Policies	Number: 706
The Title VI Program and its associated Policies #104, 108, and 701-710 were approved by the SAMTD Board of Directors on 05/25/17.	Revised: 05/25/17	Page 2 of 3

1. Vehicle Assignment

To the extent permitted by physical conditions and certain specific operating conditions on the routes, vehicles will be assigned randomly to routes for the purpose of equitably balancing the age, amenities, and condition of the vehicles amongst all riders in the District.

Each bid period, the District will develop an assignment of buses that rotates all vehicles, regardless of age or amenities, between routes.

SAMTD uses two criteria for placing buses on routes, mileage of the buses and ridership of a given route. In order to maintain approximately equal odometer readings on all of the vehicles based on their ages, the vehicles are placed in high or low usage routes accordingly. Currently, none of the buses in the Cherriots fleet have reached the end of their useful service lives, thus no routes are ever served by buses that break down frequently.

In addition, SAMTD operates two commuter type buses for its Wilsonville service. These buses have commuter style seats and luggage racks. Ridership demand dictates the size of the bus to be used. Age or type of bus or any other factor has no relevance in the assignment.

Additional criteria may influence vehicle assignment from time to time, such as rotation required by SAMTD’s advertising contract or other service provision contracts.

Policy:	System-wide Service Policies	Number: 708
The Title VI Program and its associated Policies #104, 108, and 701-710 were approved by the SAMTD Board of Directors on 05/25/17.	Effective date: 05/25/17	Page 3 of 4

2. Distribution of Transit Amenities

To the extent permitted by the topography and physical conditions on a route, transit amenities such as bus shelters, stop frequency, park and ride lots and facilities, and information displays will be equally distributed among all of the transit routes and across all areas of the SAMTD service area.

Bus stops shall be between 0.2 and 0.25 miles apart on all routes, to the extent allowed by physical circumstances; shelters shall be placed at stops based on the number of boarding's, with a goal of placing shelters at all stops in the system that serve 20 or more riders per day or more than 8 riders at one time (recognizing that some stops have physical or legal limitations that will not allow shelter placement).

Policy:	System-wide Service Policies	Number: 708
The Title VI Program and its associated Policies #104, 108, and 701-710 were approved by the SAMTD Board of Directors on 05/25/17.	Effective date: 05/25/17	Page 4 of 4

706.05 EXCEPTIONS

There may be exceptions to the above policies for seasonal variations in service, in emergency situations, or for experimental service changes or fare changes. Experimental service changes may be instituted for twelve or fewer months without an analysis of vehicle assignment or transit amenities being completed. A vehicle assignment or transit amenity analysis will be completed prior to continuation of service beyond the experimental period if the change(s) meet(s) the definition of a Major Service Change. Any exception made by the District shall be guided by the Federal regulations contained in 49 USC §5307 (c)(1)(i).

Approved By:

General Manager

Effective Date

Policy:	Major Service Changes	Number: 707
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective Date: 05/25/17	Page 1 of 4

707.01 APPLICATION

All matters related to guide the management of Major Service Changes and the requirement for Disparate Impact or Disproportionate Burden Analyses as is required by Federal regulations contained in 49 USC §5307 (c)(1)(i), Title VI of the Civil Rights Act of 1964, 42 USC §2000d et seq, Federal Transit Laws, 49 USC 53, 49 CFR §1.51, and 49 CFR part 21. See FTA circular 4702.1B dated October 1, 2012 for details.

707.02 PURPOSE

- A. The purpose of this policy is to establish the definition of a Major Service Change that has a potential disparate impact on minority populations or a potential disproportionate burden on low-income people.
- B. All changes in service meeting the definition of “Major Service Change” are subject to a Title VI Equity Analysis prior to Board approval of the service change. A Title VI Equity Analysis will be completed for all Major Service Changes and will be presented to the SAMTD Board of Directors for its consideration and included in the subsequent SAMTD Title VI Program report with a record of action taken by the Board.
- C. In the course of performing a Disparate Impact or Disproportionate Burden Analysis, SAMTD will analyze how the proposed Major Service Change action could impact minority and low-income populations including any populations that are minority and low-income (protected populations), as compared to non-protected populations.

Policy:	Major Service Changes	Number: 707
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective Date: 05/25/17	Page 2 of 4

707.03

DEFINITIONS

A. Major Service Change:

1. Either a reduction or an expansion in service of:
 - a. 15 percent or more of the number of transit route miles based on the miles of an average round-trip of the route (this includes routing changes where route miles are neither increased nor reduced (i.e., re-routes)), or;
 - b. 15 percent or more of a route’s frequency of the service (defined as the average hourly frequency throughout one service day for local fixed routes and as daily round trips for regional express routes) on a daily basis for the day of the week for which a change is made or;
 - c. 15 percent in the span (hours) of a route’s revenue service (defined as the time between the first served stop of the day and the last stop), on a daily basis for the day of the week for which a change is made;
2. A transit route split where either of the new routes meet any of the above thresholds when compared to the corresponding piece of the former route.
3. A new transit route is established.

Policy:	Major Service Changes	Number: 707
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective Date: 05/25/17	Page 3 of 4

A Major Service Change occurs whether the above thresholds are met:

1. Within a single service proposal, or;
2. Due to a cumulative effect of routing, frequency, or span changes over the year prior to the analysis.

707.04

GENERAL RULE

A. Public Hearing Requirements:

1. SAMTD shall hold a public hearing when any Major Service Change proposed that results in a decrease in service. Notice must be published in a general circulation newspaper. In addition, notice will be placed in newspapers, publications, or websites that are oriented to specific groups or neighborhoods that may be affected by the proposed Major Service Change. The notice must be published at least 30 days prior to the hearing. The notice must contain a description of the proposed service reduction, and the date, time, and place of the hearing.

707.05

EXCEPTIONS

The following service changes are exempt:

1. Standard seasonal variations in service are not considered Major Service Changes.
2. In an emergency situation, a service change may be implemented immediately without Disparate Impact or Disproportionate Burden Analyses being completed. These analyses will be completed if the emergency change is to be in effect for more than twelve months and if the change(s) meet the definition of a Major Service Change.

Policy:	Major Service Changes	Number: 707
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective Date: 05/25/17	Page 4 of 4

Examples of emergency service changes include but are not limited to those made because of the collapse of a bridge over which bus routes cross, major road or rail construction, or inadequate supplies of fuel.

3. Experimental service changes may be implemented by SAMTD for twelve months or less in order to test certain markets, new modes of transit service, etc.

Approved By:

 General Manager

 Effective Date

Policy:	Disparate Impact for Service Changes	Number: 708
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective Date: 05/25/17	Page 1 of 6

708.01 APPLICATION

All matters related to guide the management of Major Service Changes and the requirement for a Disparate Impact Analysis as is required by Federal regulations contained in 49 USC §5307 (c)(1)(i), Title VI of the Civil Rights Act of 1964, 42 USC §2000d et seq, Federal Transit Laws, 49 USC 53, 49 CFR §1.51, and 49 CFR part 21. See FTA circular 4702.1B dated October 1, 2012 for details.

708.02 PURPOSE

The Disparate Impact for Service Changes Policy establishes a threshold for determining whether a given action has a potential disparate impact on minority populations.

- A. In the course of performing a Title VI equity analysis for possible disparate impact, SAMTD will analyze how the proposed Major Service Change could impact minority populations, as compared to non-minority populations. From the Title VI Circular 4702.1B:

***Disparate Impact** refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin...*

- B. In the event the proposed action has an adverse impact that affects minority populations more than non-minority populations at a level that exceeds the thresholds established in the adopted Disparate Impact for Service Changes Policy, or that restricts the benefits of the service change to protected populations, the finding would be considered as a potential disparate impact.

Policy:	Disparate Impact for Service Changes	Number: 708
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective Date: 05/25/17	Page 2 of 6

- C. Given a potential disparate impact, SAMTD will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, SAMTD will take measures to minimize or mitigate the adverse impact of the proposed action.
- D. If no other alternative is feasible and SAMTD elects to proceed with the proposed action, then SAMTD shall provide a written statement documenting the necessity of the proposed action from a business perspective and shall continue to explore opportunities to address concerns that may exist with the proposed action.

From the Title VI Circular
The [Disparate Impact] policy shall establish a threshold for determining when adverse effects of fare/service changes are borne disproportionately by minority populations. The Disparate Impact threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by minority populations compared to impacts borne by non-minority populations. The Disparate Impact threshold must be applied uniformly... and cannot be altered until the next Title VI Program submission.

- E. The Disparate Impact for Service Changes Policy defines measures for determination of potential disparate impact on minority populations resulting from Major Service Changes. The policy is applied to both adverse effects and benefits of Major Service Changes.

708.03

DEFINITIONS

A. Major Service Change:

- 1. See Policy #707 "Major Service Changes" for details.

Policy:	Disparate Impact for Service Changes	Number: 708
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective Date: 05/25/17	Page 3 of 6

B. Disparate Impact Analysis:

1. A Disparate Impact Analysis is defined in FTA circular 4702.1B, dated October 1, 2012.
2. The Disparate Impact for Service Changes Policy defines measures for determination of potential disparate impact on minority populations resulting from Major Service Changes. The policy is applied to both adverse effects and benefits of Major Service Changes.

Adverse effects of Major Service Changes are defined as:

1. A decrease in the level of transit service (hours, days, and/or frequency) by 15%; and/or
2. Decreased access to comparable transit service, which is defined as an increase of the access distance to beyond:
 - a. One quarter mile for bus stops served by less than four buses per hour during peak times, or;
3. One half mile for bus stops served by four or more buses per hours during peak times, as well as for all regional express service.

Disparate Impact Analysis

The determination of disparate impact associated with service changes is defined separately for impacts of changes on individual route, and for system-level impacts of changes on more than one route, as well as for both service reductions and service improvements:

1. In the event of potential adverse effects resulting from service reductions:

Policy:	Disparate Impact for Service Changes	Number: 708
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective Date: 05/25/17	Page 4 of 6

- a. A Major Service Change to a single route will be considered to have a potential disparate impact if the percentage of impacted minority population in the service area of the route exceeds the percentage of minority population of Marion and Polk Counties by at least 5 percentage points (e.g., 36 percent compared to 31 percent).
 - b. To determine the system-wide impacts of Major Service Change reductions on more than one route, the percentage of Marion and Polk Counties’ minority population that is impacted is compared to the percentage of Marion and Polk Counties’ non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent greater than the percentage of the non-minority population impacted (e.g., 12 percent compared to 10 percent), the overall impact of changes will be considered disparate.
2. In the event of service improvements:
- a. A major service change to a single route will be considered to have a potential disparate impact if:
 - i. The improvement is linked to other service changes that have disproportionate and adverse effects on minority populations, or;
 - ii. The percentage of impacted minority population in the service area of the route is less than the percentage of minority population of Marion and Polk Counties by at least 5 percentage points (e.g., 26 percent compared to 31 percent).

Policy:	Disparate Impact for Service Changes	Number: 708
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective Date: 05/25/17	Page 5 of 6

- b. To determine the system-wide impacts of Major Service Change improvements on more than one route, the percentage of Marion and Polk Counties’ minority population that is impacted is compared to the percentage of Marion and Polk Counties’ non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent less than the percentage of the non-minority population impacted (e.g., 8 percent compared to 10 percent), the overall impact of the changes will be considered disparate.

Avoid, Minimize, Mitigate, or Justify

Upon determination of a disparate impact, SAMTD will either:

- a. Alter the service proposal to avoid, minimize, or mitigate potential disparate impacts, or;
 - i. Provide a substantial legitimate justification for keeping the proposal as-is, and show that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish the project or program goals.

Policy:	Disparate Impact for Service Changes	Number: 708
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective Date: 05/25/17	Page 6 of 6

For fare changes, see Policy #711 "Disparate Impact for Fare Changes" for details of how to conduct the Disparate Impact Analysis.

Approved By:

General Manager

Effective Date

Policy:	Disproportionate Burden for Service Changes	Number: 709
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective date: 05/25/17	Page 1 of 5

709.01 APPLICATION

All matters related to guide the management of Major Service Changes and the requirement for a Disproportionate Burden Analysis as is required by Federal regulations contained in 49 USC §5307 (c)(1)(i), Title VI of the Civil Rights Act of 1964, 42 USC §2000d et seq, Federal Transit Laws, 49 USC 53, 49 CFR §1.51, and 49 CFR part 21. See FTA circular 4702.1B dated October 1, 2012 for details.

709.02 PURPOSE

- A. The purpose of this policy is to establish a threshold which identifies when the adverse effects of a Major Service Change are borne disproportionately by low-income populations when compared to non-low-income populations. The Disproportionate Burden for Service Changes Policy applies only to low-income populations that are not also minority populations. Per FTA Circular 4702.1B:

From the Title VI Circular

The [Disproportionate Burden] policy shall establish a threshold for determining when adverse effects of fare/ service changes are borne disproportionately by low-income populations. The disproportionate burden threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by low-income populations as compared to impacts born by non-low-income populations.. The disproportionate burden threshold must be applied uniformly... and cannot be altered until the next [Title VI] program submission....

- B. In the event the proposed action has an adverse impact that affects low-income populations more than non-low-income populations at a level that exceeds the thresholds established in

Policy:	Disproportionate Burden for Service Changes	Number: 709
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the adopted Disproportionate Burden for Service Changes Policy, or that restricts the benefits of the service change to protected populations, the finding would be considered as a potential disproportionate burden.

- C. Given a potential disproportionate burden, SAMTD will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, SAMTD will take measures to minimize or mitigate the adverse impact of the proposed action.
- D. The Disproportionate Burden for Service Changes Policy defines measures for determination of potential disproportionate burden on low-income populations resulting from Major Service Changes. The policy is applied to both adverse effects and benefits of Major Service Changes.

Adverse Effects Analysis

Adverse effects of service changes are defined as:

1. A decrease in the level of transit service (hours, days, and/or frequency); and/or
2. Decreased access to comparable transit service, which is defined as an increase of the access distance to beyond:
 - a. One quarter mile for bus stops served by less than four buses per hour during peak times, or;
 - b. One half mile for bus stops served by four or more buses per hours during peak times, as well as for all regional express service.

Policy:	Disproportionate Burden for Service Changes	Number: 709
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective date: 05/25/17	Page 3 of 5

709.03**DEFINITIONS****A. Major Service Change:**

1. See Policy #707 "Major Service Changes" for details.

B. Low-income Population:

1. People living at or below 150 percent of the current federal poverty level, defined by the U.S. Department of Labor at the time of the analysis.

C. Disproportionate Burden Analysis:

The determination of disproportionate burden associated with service changes is defined separately for impacts of changes on individual route, and for system-level impacts of changes on more than one route, as well as for both service reductions and service improvements:

1. In the event of potential adverse effects resulting from service reductions:
 - a. A Major Service Change to a *single route* will be considered to have a potential disproportionate burden if the percentage of impacted low-income population in the service area of the route exceeds the percentage of low-income population of Marion and Polk Counties by at least 5 percentage points (e.g., 36 percent compared to 31 percent).
 - b. To determine the *systemwide* impacts of Major Service Change reductions on more than one route, the percentage of Marion and Polk Counties' low-income population that is impacted is compared to the

Policy:	Disproportionate Burden for Service Changes	Number: 709
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percentage of Marion and Polk Counties’ non-low-income population that is impacted. If the percentage of the low-income population impacted is at least 20 percent greater than the percentage of the non-low-income population impacted (e.g., 12 percent compared to 10 percent), the overall impact of changes (burden) will be considered disproportionate.

2. In the event of service improvements:

- a. A major service change to a *single route* will be considered to have a potential disproportionate burden if:
 - i. The improvement is linked to other service changes that have disproportionate and adverse effects on low-income populations, or;
 - ii. The percentage of impacted low-income population in the service area of the route is less than the percentage of low-income population of Marion and Polk Counties by at least 5 percentage points (e.g., 26 percent compared to 31 percent).
- b. To determine the *systemwide* impacts of major service change improvements on more than one route, the percentage of Marion and Polk Counties’ low-income population that is impacted is compared to the percentage of Marion and Polk Counties’ non-low-income population that is impacted. If the percentage of the low-income population impacted is at least 20 percent less than the percentage of the non-low-income population impacted (e.g., 8 percent compared to 10 percent), the overall impact of changes (burdens) will be considered

Policy:	Disproportionate Burden for Service Changes	Number: 709
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disproportionate.

Avoid, Minimize, Mitigate, or Justify

Upon determination of disproportionate burden, SAMTD will either:

- a. Alter the service proposal to avoid, minimize, or mitigate potential disproportionate burdens, or;
- b. Provide a substantial legitimate justification for keeping the proposal as-is, and show that there are no alternatives that would have a less disproportionate burden on low-income riders but would still accomplish the project or program goals.

For fare changes, see Policy #712 “Disproportionate Burden for Fare Changes” for details of how to conduct the Disproportionate Burden Analysis.

Approved By:

 General Manager

 Effective Date

Policy:	Fare Changes	Number: 710
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective date: 05/25/17	Page 1 of 2

710.01 APPLICATION

All matters related to guide the management of fare changes and the requirement for Disparate Impact or Disproportionate Burden Analyses as is required by Federal regulations contained in 49 USC §5307 (c)(1)(i), Title VI of the Civil Rights Act of 1964, 42 USC §2000d et seq, Federal Transit Laws, 49 USC 53, 49 CFR §1.51, and 49 CFR part 21. See FTA circular 4702.1B dated October 1, 2012 for details.

710.02 PURPOSE

- A. The purpose of this policy is to establish the definition of a fare change that has a potential disparate impact on minority populations or a potential disproportionate burden on low-income people. This policy outlines the process for completing the Title VI Equity Analyses that test for disparate impacts and disproportionate burdens that may occur with any change in passenger fares.
- B. Disparate Impact and Disproportionate Burden Analyses will be completed for all fare changes and will be presented to the SAMTD Board of Directors for its consideration prior to Board approval of the fare change. A copy of the approved analysis will be included in the subsequent SAMTD Title VI Program report with a record of action taken by the Board.
- C. In the course of performing a Disparate Impact or Disproportionate Burden Analysis, SAMTD (“The District”) will analyze how the proposed fare change action could impact minority and low-income populations including any populations that are minority and low-income (protected populations), as compared to non-protected populations.

Policy:	Fare Changes	Number: 710
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective date: 05/25/17	Page 2 of 2

710.03 DEFINITIONS

A. Fare change:

1. Any increase or decrease in transit passenger fares. An increase is made when there is an increase in any cash fare or in the cost of any passes, tickets, transfers, or other means by which transit riders pay for their trips. A fare decrease is defined when the price of any fare option as specified in the previous sentence, is lowered.

710.04 GENERAL RULE

A. Public Hearing Requirements:

1. SAMTD shall hold a public hearing when any increase in fares is proposed. Notice must be published in a general circulation newspaper. In addition, notice will be placed in newspapers, publications, or internet sites that are oriented to specific groups or neighborhoods that may be affected by the proposed fare change. The notice must be published at least 30 days prior to the hearing. The notice must contain a description of the proposed fare change, and the date, time, and place of the hearing.

Approved By:

 General Manager

 Effective Date

Policy:	Disparate Impact for Fare Changes	Number: 711
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective date: 05/25/17	Page 1 of 4

711.01 APPLICATION

All matters related to guide the management of fare changes and the requirement for Disparate Impact Analysis as is required by Federal regulations contained in 49 USC §5307 (c)(1)(i), Title VI of the Civil Rights Act of 1964, 42 USC §2000d et seq, Federal Transit Laws, 49 USC 53, 49 CFR §1.51, and 49 CFR part 21. See FTA circular 4702.1B dated October 1, 2012 for details.

711.02 PURPOSE

- A. The purpose of this policy is to guide SAMTD staff in the calculation of any potential disparate impact on minority populations when fare changes are proposed. This policy outlines the process for completing the Disparate Impact Analysis, which tests for a disparate impact to minorities that may occur with any change in passenger fares.
- B. A Disparate Impact Analysis will be completed for all fare changes and will be presented to the SAMTD Board of Directors for its consideration prior to Board approval of the fare change. A copy of the approved analysis will be included in the subsequent SAMTD Title VI Program report with a record of action taken by the Board.
- C. In the course of performing a Disparate Impact Analysis, SAMTD (“The District”) will analyze how the proposed fare change action could impact minority populations including any populations that are minority and low-income (protected populations), as compared to non-protected populations.

Policy:	Disparate Impact for Fare Changes	Number: 711
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711.03

DEFINITIONS

A. Fare change:

See Policy #710 "Fare Changes" for a definition.

B. Disparate impact:

***Disparate Impact** refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin...*

1. In the event the proposed action has an adverse impact that affects minority populations more than non-minority populations at a level that exceeds the thresholds established in the adopted Disparate Impact for Fare Changes Policy, or that restricts the benefits of the service change to protected populations, the finding would be considered as a potential disparate impact. Given a potential disparate impact, SAMTD will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, SAMTD will take measures to minimize or mitigate the adverse impact of the proposed action.

Policy:	Disparate Impact for Fare Changes	Number: 711
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective date: 05/25/17	Page 3 of 4

From the Title VI Circular
The [Disparate Impact] policy shall establish a threshold for determining when adverse effects of fare/service changes are borne disproportionately by minority populations. The Disparate Impact threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by minority populations compared to impacts borne by non-minority populations. The Disparate Impact threshold must be applied uniformly... and cannot be altered until the next Title VI Program submission.

The Disparate Impact for Fare Changes Policy defines measures for determination of potential disparate impact on minority populations resulting from any changes in fares.

C. Adverse Effects and Disparate Impact Analysis

For fare changes, a potential disparate impact is noted when the percentage of trips by minority riders using a fare option, in combination with the percentage price change for that option, has an impact that exceeds the comparable impact on nonminority riders. Differences in the use of fare options between minority populations and other populations include all such differences that are documented as statistically significant at the 95 percent confidence level.

Policy:	Disparate Impact for Fare Changes	Number: 711
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective date: 05/25/17	Page 4 of 4

D. Avoid, Minimize, Mitigate, or Justify

Upon determination of a disparate impact, SAMTD will either:

- a. Alter the service proposal to avoid, minimize, or mitigate potential disparate impacts, or;
- b. Provide a substantial legitimate justification for keeping the proposal as-is, and show that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish the project or program goals.

Approved By:

 General Manager

 Effective Date

Policy:	Disproportionate Burden for Fare Changes	Number: 712
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective date: 05/25/17	Page 1 of 3

712.01 APPLICATION

All matters related to guide the management of fare changes and the requirement for a Disproportionate Burden Analysis as is required by Federal regulations contained in 49 USC §5307 (c)(1)(i), Title VI of the Civil Rights Act of 1964, 42 USC §2000d et seq, Federal Transit Laws, 49 USC 53, 49 CFR §1.51, and 49 CFR part 21. See FTA circular 4702.1B dated October 1, 2012 for details.

712.02 PURPOSE

- A. The purpose of this policy is to establish the definition of a fare change that has a potential disproportionate burden on low-income people. This policy outlines the process for completing the Disproportionate Burden Analysis that tests for disproportionate burdens that may occur with any change in passenger fares.
- B. The Disproportionate Burden for Fare Changes Policy defines measures for determination of potential disproportionate burden on low-income populations resulting from any changes in fares.
- C. A Disproportionate Burden Analysis will be completed for all fare changes and will be presented to the SAMTD Board of Directors for its consideration prior to Board approval of the fare change. A copy of the approved analysis will be included in the subsequent SAMTD Title VI Program report with a record of action taken by the Board.
- D. In the course of performing a Disproportionate Burden Analysis, SAMTD (“The District”) will analyze how the proposed fare change action could impact low-income populations including any populations that are low-income (protected populations), as compared to non-protected populations.

Policy:	Disproportionate Burden for Fare Changes	Number: 712
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective date: 05/25/17	Page 2 of 3

712.03

DEFINITIONS

A. Fare change:

1. See Policy #710 "Fare Changes" for a definition.

B. Disproportionate Burden:

From the Title VI Circular
The [Disproportionate Burden] policy shall establish a threshold for determining when adverse effects of fare/ service changes are borne disproportionately by low-income populations. The disproportionate burden threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by low-income populations as compared to impacts born by non-low-income populations.. The disproportionate burden threshold must be applied uniformly... and cannot be altered until the next [Title VI] program submission....

1. In the event the proposed action has an adverse impact that affects low-income populations more than non-low-income populations at a level that exceeds the thresholds established in the adopted Disproportionate Burden for Fare Changes Policy, or that restricts the benefits of the fare change to protected populations, the finding would be considered as a potential disproportionate burden.
2. Given a potential disproportionate burden, SAMTD will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, SAMTD will take measures to minimize or mitigate the adverse impact of the proposed action.

Policy:	Disproportionate Burden for Fare Changes	Number: 712
The Title VI Program with supporting policies #104 and #108 was approved by the SAMTD Board of Directors on 05/25/17. Policies #703-712 were approved by the General Manager on 5/25/17.	Effective date: 05/25/17	Page 3 of 3

C. Adverse Effects and Disproportionate Burden Analysis:

For fare changes, a potential disproportionate burden is noted when the percentage of trips by low-income riders using a fare option, in combination with the percentage price change for that option, has an impact that exceeds the comparable impact on non-low-income riders. Differences in the use of fare options between low-income populations and other populations include all such differences that are documented as statistically significant at the 95 percent confidence level.

D. Avoid, Minimize, Mitigate, or Justify

Upon determination of a disparate impact, SAMTD will either:

- a. Alter the service proposal to avoid, minimize, or mitigate potential disparate impacts, or;
- b. Provide a substantial legitimate justification for keeping the proposal as-is, and show that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish the project or program goals.

Approved By:

 General Manager

 Effective Date

Attachment H: Subrecipient Title VI Documentation

The following documents are the Title VI Notices, complaint procedures, and complaint forms for the following non-profit organizations that receive Federal and State grants through SAMTD (“subrecipients”):

1. Catholic Community Services
2. Silverton Health
3. Salem Health

Catholic Community Services Foundation

A Forever Home for Everyone

Catholic Services Housing and Development, LLC

3745 Portland Rd NE
Salem, OR 97301

Catholic Community Services Title VI Civil Rights Statement *Catholic Community Services Respects Civil Rights*

Catholic Community Services operates its programs without regard to race, color, religion, sex, sexual orientation, national origin, marital status, age, disability, or income status in accordance with Title VI of the Civil Rights Act, ORS Chapter 659A or other applicable law. For more information, please contact 503-390-2600 or email info@ccswv.org. Catholic Community Services is committed to complying with the requirements of Title VI in all of its federally funded programs and activities.

Catholic Community Services Title VI Statement

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

Making a Title VI complaint Any person who believes he or she has been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with Catholic Community Services. Any such complaint must be in writing and filed with Catholic Community Services within 180 days following the date of the alleged discriminatory occurrence. For information on how to file a complaint, contact Catholic Community Services by any of the methods provided below.

Mail Fleet Manager @
Catholic Community Services
3745 Portland Rd NE
Salem, OR 97301

Phone, Fax, or Email Phone 503-390-2600
Fax 503-990-6701
Email info@ccswv.org

Copies of CCS's Title VI notice is located in main and subsidiary offices 3737 & 3745 Portland Rd NE Salem, OR 97301, on website www.goisn.org, and vehicles

CCSF4.16.2014

Copia del aviso de CCS título VI está situado en las oficinas principales y subsidiarias 3737 & 3745 Portland Rd NE Salem, OR 97301, en el sitio web www.goisn.org y vehículos

CCSF4.16.2014

Catholic Community Services Foundation

A Forever Home for Everyone

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3745 Portland Rd NE
Salem, OR 97301

Comunidad católica servicios Título VI declaración de los derechos civiles

Servicios de la comunidad católica los derechos civiles de los aspectos

Servicios a la comunidad católica opera sus programas sin distinción de raza, color, religión, sexo, orientación sexual, origen nacional, estado civil, edad, discapacidad o estado de ingresos según el título VI de la ley de derechos civiles, ORS Capítulo 659A u otra ley aplicable. Para obtener más información, llame al 503-390-2600 o un correo electrónico a info@ccswv.org. Servicios a la comunidad católica se compromete a cumplir con los requisitos del título VI en todas sus actividades y programas financiados por fondos federales.

Comunidad católica servicios Título VI declaración

Título VI de la ley de derechos civiles de 1964 Estados: *"ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, excluida de la participación en, ser negada los beneficios de o ser objeto de discriminación bajo cualquier programa o actividad recibiendo asistencia financiera Federal"*.

Un reclamo de título VI Cualquier persona que cree que él o ella ha sido agraviada por una práctica discriminatoria ilegal bajo el título VI puede presentar una queja con servicios a la comunidad católica. Cualquier denuncia debe ser por escrito y presentada con servicios a la comunidad católica dentro de los 180 días siguientes a la fecha de la presunta ocurrencia discriminatoria. Para obtener información sobre cómo presentar una queja, comuníquese con servicios a la comunidad católica por cualquiera de los métodos proporcionados por debajo.

Correo Fleet Manager @

Servicios a la comunidad católica
3745 Portland Rd NE
Salem, OR 97301

Teléfono, Fax o correo electrónico Teléfono 503-390-2600

Fax 503-990-6701

Correo electrónico info@ccswv.org

Copies of CCS's Title VI notice is located in main and subsidiary offices 3737 & 3745 Portland Rd NE Salem, OR 97301, on website www.goisn.org, and vehicles

CCSF4.16.2014

Copia del aviso de CCS título VI está situado en las oficinas principales y subsidiarias 3737 & 3745 Portland Rd NE Salem, OR 97301, en el sitio web www.goisn.org y vehículos

CCSF4.16.2014

Catholic Community Services Foundation

A Forever Home for Everyone

Catholic Services Housing and Development, LLC

3745 Portland Rd NE
Salem, OR 97301

Title VI Complaint Form

Tell us how to contact you:

Name: _____

Home Phone: _____ Work Phone: _____ Mobile Phone: _____

Best Time to Call (if additional information is needed): _____

E-mail Address: _____

Date of Alleged Incident: _____

Were you discriminated against because of:

- Race
- National Origin
- Marital Status
- Sex
- Sexual Orientation
- Religion
- Color
- Age
- Disability
- Income Status
- Marital Status
- Other _____

Please explain as clearly as possible what happened and how you were discriminated against. Indicate who was involved. Be sure to include as much detail as possible including names and contact information of witnesses. (Use back if more space is needed for explanation)

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Catholic Services Housing and Development, LLC

3745 Portland Rd NE
Salem, OR 97301

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

- Federal Agency
- State Agency
- Local Agency

If you have filed a complaint, please provide information about a contact person at the agency where the complaint was filed.

Name: _____

Address: _____

City, State & Zip Code: _____

Phone: _____

E-Mail: _____

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

_____/_____
Signature Date

This form may be taken to the main office located at 3737 Portland Rd NE Salem, OR 97301 or it may be mailed to: 3745 Portland Rd NE. Salem, OR 97301 Attn: Fleet Manager

Catholic Community Services Foundation

A Forever Home for Everyone

Catholic Services Housing and Development, LLC

3745 Portland Rd NE
Salem, OR 97301

CATHOLIC COMMUNITY SERVICES **Title VI Complaint Procedure**

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color or national origin may file a written complaint with CATHOLIC COMMUNITY SERVICES, 3737 Portland Rd NE., Salem, Oregon 97301.

Complainants have the right to complain directly to the appropriate agency. Every effort will be made to obtain early resolution of complaints. The option of informal meeting(s) between the affected parties and the HR Director may be utilized for resolutions. The HR Director will notify Associate Director, Fleet Manager and all other applicable parties of all Title VI related complaints as well as all resolutions.

PROCEDURE

1. The complaint must meet the following requirements:
 - a. Complaint shall be in writing and signed by the complainant(s). In cases where Complainant is unable or incapable of providing a written statement, as verbal complaint may be made. The HR Director or designee will interview the Complainant and assist the person in converting verbal complaints to writing. All complaints must, however, be signed by the Complainant or his/her representative.
 - b. Include the date of the alleged act of discrimination, date when the Complainant became aware of the alleged act of discrimination: or the date on which the conduct was discontinued or the latest instance of conduct.
 - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.
 - d. Federal and state law requires complaints be filed within 180 calendar days of the alleged incident.
2. Upon receipt of the complaint, the HR Director will determine its jurisdiction, acceptability, need for additional information.
3. The complainant will be provided with a written acknowledgement that CATHOLIC COMMUNITY SERVICES has either accepted or rejected the complaint.
4. A complaint must meet the following criteria for acceptance:
 - a. The Complaint must be filed within 180 days of the alleged occurrence.
 - b. The allegation must involve a covered basis such as race, color or national origin.
 - c. The allegation must involve CATHOLIC COMMUNITY SERVICES service of a Federal-aid recipient, sub-recipient or contractor.

April 18, 2014

[WS-212]

Catholic Community Services Foundation

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Catholic Services Housing and Development, LLC

3745 Portland Rd NE
Salem, OR 97301

5. A complaint may be dismissed for the following reasons:
 - a. The Complainant requests the withdrawal of the complaint.
 - b. The Complainant fails to respond to repeated requests for additional information needed to process the complaint.
 - c. The Complainant cannot be located after reasonable attempts.

6. Once CATHOLIC COMMUNITY SERVICES's —decides to accept the complaint for investigation, the Complainant will be notified in writing of such determination. The complaint will receive a case number and will be logged in a database identifying: Complainants name, basis, alleged harm, race color and national origin of the Complainant.

7. In cases where CATHOLIC COMMUNITY SERVICES's HR Director assumes the investigation of the complaint, within 90 calendar days of the acceptance of the complaint, CATHOLIC COMMUNITY SERVICES's HR Director will prepare an investigative report for review by the General Manager or his/her designee. The report shall include a narrative description of the incident, indemnification of persons interviewed, findings and recommendations for disposition.

8. The investigative report and its finding will be reviewed by the General Manager of CATHOLIC COMMUNITY SERVICES and in some cases by CATHOLIC COMMUNITY SERVICES's Legal Counsel. The report will be modified as needed.

9. The General Manager/Legal Counsel will make a determination on the disposition of the complaint. Dispositions will be stated as follows: In the event CATHOLIC COMMUNITY SERVICES is in noncompliance with Title VI regulation remedial actions will be listed.

10. Notice of determination will be mailed to the Complainant. Notices shall include information regarding appeal rights of Complainant and instruction for initiating such and appeal. Notice of appeals are as follows:
 - a. CATHOLIC COMMUNITY SERVICES will reconsider this determination, if new facts come to light.
 - b. If Complainant is dissatisfied with the determination and/or resolution set forth by CATHOLIC COMMUNITY SERVICES, the same complaint may be submitted to the FTA for investigation.Complainant will be advised to contract:

Federal Transit Administration Office of Civil Rights,
Attn: Title VI Program Coordinator,
East Building 5th Floor – TCR
1200 New Jersey Ave. SE,
Washington, D.C. 20590,
Telephone 202-366-4018.

April 18, 2014

[WS-213]

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3745 Portland Rd NE
Salem, OR 97301

11. A copy of the complaint and CATHOLIC COMMUNITY SERVICES's investigation report/letter of finding and Final Remedial Action Plan, if appropriate will be issued to FTA within 120 days of the receipt of the complaint.

12. A summary of the complaint and its resolution will be included as part of the Title VI updates to the FTA.

RECORDKEEPING REQUIREMENT

The HR Director will ensure that all records relating to CATHOLIC COMMUNITY SERVICES's Title VI Complaint Process are maintained with department records. Records will be available for compliance review audits.

April 18, 2014

[WS-214]

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PUBLIC PARTICIPATION PLAN / LEP

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Catholic Community Services is committed to breaking down language barriers by implementing consistent standards of language assistance across its service area.

BACKGROUND

Historic Data

The United States is home to millions of national origin minority individuals who are LEP. That is, their primary language is not English and they cannot speak, read, write, or understand the English language at a level that permits them to interact effectively with recipients of Federal financial assistance. Because of language differences and the inability to effectively speak or understand English, persons with LEP may be subject to exclusion from programs or activities, experience delays or denials of services. These individuals may be entitled to language assistance with respect to a particular type of service. The federal government and those receiving assistance from the federal government must take reasonable steps to ensure that LEP persons have meaningful access to the programs, services, and information those entities provide. This will require agencies to establish creative solutions to address the needs of this ever-growing population of individuals, for whom English is not their primary language.

Census Data

According to the 2000 Census City Data for Marion, Yamhill, and Polk County, English is spoken in average of 68.7%, while 24.3% represents Spanish speaking culture and another 1.7% represents other cultural languages.

FACTORS & ANALYSIS

Factor No. 1: The nature and importance of service provided by Catholic Community Services
Catholic Community Services provides important transit services to the public through its fixed route and para-transit routes.

Factor No. 2: The number or proportion of LEP persons in the service area.
Catholic Community Services provides services in Marion, Polk, and Yamhill County. The vast majority of the population with which we do business (individuals wishing to ride transit) is proficient in English, so that LEP services are not normally required. No information was available regarding the percentage of bilingual residents of the counties.

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Factor No. 3. The frequency with which LEP individuals come into contact with the service.

All contacts with Catholic Community Services are made through staffs that help administer programs for operations. LEP persons served have served have the ability to come into contact with services via care providers. Catholic Community Services employee bi-lingual staffs who can provide translate assistance for persons via in person or over the phone for approximately 5-10x a day. There is currently no tracking availability at this time, along with zero data to inventory calls needing translation services.

Factor No. 4. Catholic Community Services will ensure the availability of resources to the recipient of the federal funds to assure meaningful access to the service by LEP persons.

Catholic Community Services current in-house language capabilities are Spanish and English. Experienced staff is fluent in these languages. They have agreed to serve as interpreters as needed on those occasions when a person with limited English proficiency contacts the transit system. Catholic Community Services recognizes the need to have language services in other languages besides Spanish. Catholic Community Services will be working with community partners to implement additional translation assistance through outreach programs such as Salem Housing Authority.

IMPLEMENTATION PLAN

Catholic Community Services currently has implemented its plan and will review it annually, including any contacts with the LEP persons to determine the frequency of contacts, the language used, and how the contacts were handled. We identify LEP persons in the service area by services provided in the community, ridership, telephone contact counts, neighborhood demographics, general awareness surveys and board surveys. Receptionist for Catholic Community Services, along with Human Resource personal will assist in translation services.

Catholic Community Services Title VI policy and a Complaint Form are available on our website. If there is a service change, we will produce media content in Spanish and in English. In order to comply with 49 CFR 21.9(d), Link Transit and its sub recipients must provide information to beneficiaries regarding their Title VI obligations and inform beneficiaries of the protections against discrimination afforded them by Title VI. Catholic Community Services has established a statement of rights and a policy statement.

NOTIFYING BENEFICIARIES OF THEIR RIGHTS UNDER TITLE VI

1. Catholic Community Services website includes our Title VI policy and complaint form. The website will also state: Catholic Community Services does not discriminate on the basis of race, color or national origin. Catholic Community Services no discrimina en base de raza, color o origen nacional.
2. Our Title VI policy and complaint form are also posted in our main office of operations located at 3737 Portland Rd NE Salem, OR 97301. Individuals who believe they have been discriminated against may request a complaint form from reception at this location.

INCLUSIVE PUBLIC PARTICIPATION

Community Outreach is a requirement of Title VI. Recipients and sub recipients shall seek out and consider the viewpoints of minority and low-income populations in the course of conducting public

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3745 Portland Rd NE
Salem, OR 97301

outreach. Recipients have wide latitude to determine what specific measures are most appropriate and should make this determination based on the composition of the affected population and include public involvement in process design.

1. Public Meetings - When new service is proposed information is disseminated to the neighborhoods affected and public meetings are scheduled.

2. Travel Training Class – Catholic Community Services will have a travel training program developed by 2015 to reach out to community groups (senior centers, senior facilities, the disabled community) Travel Training classes are ongoing as well as outreach to these populations.

3. Customer Complaint Process - Citizens may call Catholic Community Services at 503-390-2600 to lodge a complaint or comment. All complaints/comments will be inputted into a database. Human Resource Director will then review the complaints / comments and responds back to the citizen.

4. Bilingual Outreach - Link Catholic Community Services will provide Spanish-speaking guests with information on public transit services in Spanish.

TITLE VI COMPLAINT PROCEDURES

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color or national origin may file a written complaint with CATHOLIC COMMUNITY SERVICES, 3737 Portland Rd NE., Salem, Oregon 97301.

Complainants have the right to complain directly to the appropriate agency. Every effort will be made to obtain early resolution of complaints. The option of informal meeting(s) between the affected parties and the HR Director may be utilized for resolutions. The HR Director will notify Associate Director, Fleet Manager and all other applicable parties of all Title VI related complaints as well as all resolutions.

PROCEDURE

1. The complaint must meet the following requirements:

- a. Complaint shall be in writing and signed by the complainant(s). In cases where Complainant is unable or incapable of providing a written statement, as verbal complaint may be made. The HR Director or designee will interview the Complainant and assist the person in converting verbal complaints to writing. All complaints must, however, be signed by the Complainant or his/her representative.
- b. Include the date of the alleged act of discrimination, date when the Complainant became aware of the alleged act of discrimination: or the date on which the conduct was discontinued or the latest instance of conduct.
- c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.
- d. Federal and state law requires complaints be filed within 180 calendar days of the alleged incident.

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Salem, OR 97301

2. Upon receipt of the complaint, the HR Director will determine its jurisdiction, acceptability, need for additional information.
3. The complainant will be provided with a written acknowledgement that CATHOLIC COMMUNITY SERVICES has either accepted or rejected the complaint.
4. A complaint must meet the following criteria for acceptance:
 - a. The Complaint must be filed within 180 days of the alleged occurrence.
 - b. The allegation must involve a covered basis such as race, color or national origin.
 - c. The allegation must involve CATHOLIC COMMUNITY SERVICES service of a Federal-aid recipient, sub-recipient or contractor.
5. A complaint may be dismissed for the following reasons:
 - a. The Complainant requests the withdrawal of the complaint.
 - b. The Complainant fails to respond to repeated requests for additional information needed to process the complaint.
 - c. The Complainant cannot be located after reasonable attempts.
6. Once CATHOLIC COMMUNITY SERVICES's —decides to accept the complaint for investigation, the Complainant will be notified in writing of such determination. The complaint will receive a case number and will be logged in a database identifying: Complainants name, basis, alleged harm, race color and national origin of the Complainant.
7. In cases where CATHOLIC COMMUNITY SERVICES's HR Director assumes the investigation of the complaint, within 90 calendar days of the acceptance of the complaint, CATHOLIC COMMUNITY SERVICES's HR Director will prepare an investigative report for review by the General Manager or his/her designee. The report shall include a narrative description of the incident, indemnification of persons interviewed, findings and recommendations for disposition.
8. The investigative report and its finding will be reviewed by the General Manager of CATHOLIC COMMUNITY SERVICES and in some cases by CATHOLIC COMMUNITY SERVICES's Legal Counsel. The report will be modified as needed.
9. The General Manager/Legal Counsel will make a determination on the disposition of the complaint. Dispositions will be stated as follows: In the event CATHOLIC COMMUNITY SERVICES is in noncompliance with Title VI regulation remedial actions will be listed.
10. Notice of determination will be mailed to the Complainant. Notices shall include information regarding appeal rights of Complainant and instruction for initiating such and appeal. Notice of appeals are as follows:
 - a. CATHOLIC COMMUNITY SERVICES will reconsider this determination, if new facts come to light.

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Catholic Services Housing and Development, LLC

3745 Portland Rd NE
Salem, OR 97301

b. If Complainant is dissatisfied with the determination and/or resolution set forth by CATHOLIC COMMUNITY SERVICES, the same complaint may be submitted to the FTA for investigation.

Complainant will be advised to contact:

Federal Transit Administration Office of Civil Rights,
Attn: Title VI Program Coordinator,
East Building 5th Floor – TCR
1200 New Jersey Ave. SE,
Washington, D.C. 20590,
Telephone 202-366-4018.

11. A copy of the complaint and CATHOLIC COMMUNITY SERVICES's investigation report/letter of finding and Final Remedial Action Plan, if appropriate will be issued to FTA within 120 days of the receipt of the complaint.

12. A summary of the complaint and its resolution will be included as part of the Title VI updates to the FTA.

RECORDKEEPING REQUIREMENT

The HR Director will ensure that all records relating to CATHOLIC COMMUNITY SERVICES's Title VI Complaint Process are maintained with department records. Records will be available for compliance review audits.

RECORD OF TITLE VI INVESTIGATIONS, COMPLAINTS OR LAWSUITS

To date, there have been no Title VI investigations, complaints or lawsuits.

The following documents comprise the Title VI program for Silverton Health, a non-profit organization which administers Silverton Hospital and 16 other clinics throughout Marion County. The CareVan is a donation-supported transportation service providing safe and reliable medical transportation to the hospital and clinics associated with Silverton Health.

**Silverton Health
MANUAL**

TITLE: CIVIL RIGHTS TITLE VI

**PAGE: 1 of 2
Policy No:**

Date Issued:	Source/Reference: Civil Rights Title VI Policy
Date Reviewed:	
Date Revised:	Departments Affected: Diversity and Inclusion, Risk
Author: Melinda Veliz	

PURPOSE: Silverton Health operates its programs without regard to race, color, religion, sex, sexual orientation, national origin, marital status, age, disability, or income status in accordance with Title VI of the Civil Rights Act, ORS Chapter 659A or other applicable law. For more information, please contact 503-779-2246 or email mveliz@silvertonhealth.org. Silverton Health is committed to complying with the requirements of Title VI in all of its federally funded programs and activities.

POLICY STATEMENT: Silverton Health Title VI Statement

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

PROCEDURE: Making a Title VI complaint Any person who believes he or she has been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with Silverton Health. Any such complaint must be in writing and filed with Silverton Health within 180 days following the date of the alleged discriminatory occurrence. For information on how to file a complaint, contact Silverton Health by any of the methods provided below.

Mail Community Engagement and Inclusion Director
1475 Mt Hood Ave
Woodburn, OR 97071

Phone, Fax, or Email Phone 503-779-2246
Fax 971-983-5229
Email mveliz@silvertonhealth.org

Copies of CCS's Title VI notice is located in main and subsidiary offices.

Approvals:

Related Policies:

**Silverton Health
MANUAL**

TITLE: CIVIL RIGHTS TITLE VI

**PAGE: 2 of 2
Policy No:**

DRAFT

Silverton Health Title VI Civil Rights Statement

Silverton Health Respects Civil Rights

Silverton Health operates its programs without regard to race, color, religion, sex, sexual orientation, national origin, marital status, age, disability, or income status in accordance with Title VI of the Civil Rights Act, ORS Chapter 659A or other applicable law. For more information, please contact 503-779-2246 or email mveliz@silvertonhealth.org. Silverton Health is committed to complying with the requirements of Title VI in all of its federally funded programs and activities.

Silverton Health Title VI Statement

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

Making a Title VI complaint Any person who believes he or she has been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with Silverton Health. Any such complaint must be in writing and filed with Silverton Health within 180 days following the date of the alleged discriminatory occurrence. For information on how to file a complaint, contact Silverton Health by any of the methods provided below.

Mail Community Engagement & Inclusion Director @
Silverton Health
1475 Mt Hood Ave
Woodburn, Oregon 97071

Phone, Fax, or Email Phone: 503-779-2246
Fax: 971-983-5229
Email: mveliz@silvertonhealth.org

Title VI Complaint Form

Tell us how to contact you:

Name: _____

Home Phone: _____ Work Phone: _____ Mobile Phone: _____

Best Time to Call (if additional information is needed): _____

E-mail Address: _____

Date of Alleged Incident: _____

Were you discriminated against because of:

- Race
- National Origin
- Marital Status
- Sex
- Sexual Orientation
- Religion
- Color
- Age
- Disability
- Income Status
- Marital Status
- Other _____

Please explain as clearly as possible what happened and how you were discriminated against. Indicate who was involved. Be sure to include as much detail as possible including names and contact information of witnesses. (Use back if more space is needed for explanation)

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

- Federal Agency
- State Agency
- Local Agency

If you have filed a complaint, please provide information about a contact person at the agency where the complaint was filed.

Name: _____

Address: _____

City, State & Zip Code: _____

Phone: _____

E-Mail: _____

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

_____/_____
Signature Date

This form may be taken to the main office located at 1475 Mt Hood Ave, Woodburn, OR or it may be mailed to: 1475 Mt Hood Ave, Woodburn, OR, Attention: Community Engagement and Inclusion Director.

Silverton Health

Title VI Complaint Procedure

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color or national origin may file a written complaint with SILVERTON HEALTH, 1475 Mt. Hood Ave, Woodburn,OR.

Complainants have the right to complain directly to the appropriate agency. Every effort will be made to obtain early resolution of complaints. The option of informal meeting(s) between the affected parties and the Community Engagement and Inclusion Director may be utilized for resolutions. The Community Engagement and Inclusion Director will notify Quality and Risk Management Director, HR Director and all other applicable parties of all Title VI related complaints as well as all resolutions.

PROCEDURE

1. The complaint must meet the following requirements:
 - a. Complaint shall be in writing and signed by the complainant(s). In cases where Complainant is unable or incapable of providing a written statement, as verbal complaint may be made. The Community Engagement and Inclusion Director or designee will interview the Complainant and assist the person in converting verbal complaints to writing. All complaints must, however, be signed by the Complainant or his/her representative.
 - b. Include the date of the alleged act of discrimination, date when the Complainant became aware of the alleged act of discrimination: or the date on which the conduct was discontinued or the latest instance of conduct.
 - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.
 - d. Federal and state law requires complaints be filed within 180 calendar days of the alleged incident.

2. Upon receipt of the complaint, the Community Engagement and Inclusion Director will determine its jurisdiction, acceptability, need for additional information.

3. The complainant will be provided with a written acknowledgement that SILVERTON HEALTH has either accepted or rejected the complaint.

4. A complaint must meet the following criteria for acceptance:
 - a. The Complaint must be filed within 180 days of the alleged occurrence.
 - b. The allegation must involve a covered basis such as race, color or national origin.
 - c. The allegation must involve SILVERTON HEALTH service of a Federal-aid recipient, sub-recipient or contractor.

5. A complaint may be dismissed for the following reasons:
 - a. The Complainant requests the withdrawal of the complaint.

- b. The Complainant fails to respond to repeated requests for additional information needed to process the complaint.
- c. The Complainant cannot be located after reasonable attempts.

6. Once SILVERTON HEALTH's —decides to accept the complaint for investigation, the Complainant will be notified in writing of such determination.

The complaint will receive a case number and will be logged in a database identifying: Complainants name, basis, alleged harm, race color and national origin of the Complainant.

7. In cases where SILVERTON HEALTH's Community Engagement and Inclusion Director assumes the investigation of the complaint, within 90 calendar days of the acceptance of the complaint, SILVERTON HEALTH's Community Engagement and Inclusion Director will prepare an investigative report for review by the General Manager or his/her designee. The report shall include a narrative description of the incident, indemnification of persons interviewed, findings and recommendations for disposition.

8. The investigative report and its finding will be reviewed by the General Manager of SILVERTON HEALTH and in some cases by SILVERTON HEALTH's Legal Counsel. The report will be modified as needed.

9. The General Manager/Legal Counsel will make a determination on the disposition of the complaint. Dispositions will be stated as follows: In the event SILVERTON HEALTH is in noncompliance with Title VI regulation remedial actions will be listed.

10. Notice of determination will be mailed to the Complainant. Notices shall include information regarding appeal rights of Complainant and instruction for initiating such and appeal. Notices of appeals are as follows:

- a. SILVERTON HEALTH will reconsider this determination, if new facts come to light.
- b. If Complainant is dissatisfied with the determination and/or resolution set forth by SILVERTON HEALTH, the same complaint may be submitted to the FTA for investigation.

Complainant will be advised to contact:

Federal Transit Administration Office of Civil Rights,
Attn: Title VI Program Coordinator,
East Building 5th Floor – TCR
1200 New Jersey Ave. SE,
Washington, D.C. 20590,
Telephone 202-366-4018.

The following document is an interim document while West Valley Hospital develops official Title VI Notice to the Public, complaint form, and complaint procedure. Once those documents are received by SAMTD, they will be added to this appendix. West Valley Hospital is administered by Salem Health. It is a non-profit organization that operates a Connections van, which provides transportation to and from medical appointments at West Valley Hospital, West Valley Physicians & Surgeons Clinic, Monmouth Medical Center and the Surgical Specialty Clinic. The van is wheelchair accessible and is staffed by volunteers who accept donations.

Nondiscrimination Policy for Patients & Visitors	
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Applicable Campus: Salem Health	Department Name: Administration
Final Approval: February 2013 Effective: February 2013 SH & WV	Next Review Date: February 2016 SH & WV
List all stakeholder(s) and dates of approval:	
Stakeholder Position(s)/Committee: Service Excellence Date:	Date: 12/2012 Reviewed <input checked="" type="checkbox"/> Revised <input type="checkbox"/>
Stakeholder Position(s)/Committee: Accreditation Administrator	Date: 12/2012 Reviewed <input checked="" type="checkbox"/> Revised <input type="checkbox"/>
Stakeholder Position(s)/Committee: WVH Director of Clinical Operations	Date: 12/2012 Reviewed <input checked="" type="checkbox"/> Revised <input type="checkbox"/>
Stakeholder Position(s)/Committee: Executive Leadership Council	Date: 02/2013 Reviewed <input checked="" type="checkbox"/> Revised <input type="checkbox"/>

Describe briefly the most recent revision made to this policy, procedure or protocol & why:

New

Definitions:

-

POLICY CONTENT

As a recipient of Federal financial assistance, Salem Health does not exclude, deny benefits to, or otherwise discriminate against any person on the basis of race, color, national origin, disability, or age in admission to, participation in, or receipt of the services and benefits under any of its programs and activities, whether carried out by Salem Health directly or through a contractor or any other entity with which Salem Health arranges to carry out its programs and activities.

This statement is in accordance with the provisions of Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and Regulations of the U.S. Department of Health and Human Services issued pursuant to these statutes at Title 45 Code of Federal Regulations Parts 80, 84, and 91.

If questions please contact Director of Service Excellence (504 Coordinator) at 503-561-5712.

TDD Dial 7-1-1 or 1-800-735-2900.

STEPS/KEY POINTS (Procedures/Protocols)
--

Equipment/Supplies (If Applicable):

Form Name & Number or Attachment Name (If Applicable):

Author Position:

Review/Revision Authority (Position Not Individual Name):

Expert Consultant Position/s (Not Individual Name/s):

References (Required for Clinical Documents):

Is there a Regulatory Requirement? Yes **No**

If yes, insert requirement information here:

OCR

Review History (No Changes):

Revision History (Note changes in area under header):

New 02/13

Computer Search Words:

Policy, Procedure or Protocol Cross Reference Information:

Attachment I: 2016 Rider (Fare) Survey

The following is a copy of the rider survey completed in June, 2016 regarding fares.

2016 Cherriots Rider Survey Report



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Executive Summary

A rider survey was performed on Cherriotics local buses in May and June, 2016 in order to understand how customers are purchasing their fares in relation to their racial and ethnic backgrounds and income levels. This survey will help inform any equity analysis required by a future fare change proposal. Questions that will help inform potential future fare implements as well as information to inform the District's sales and marketing of fare media were included. Some major lessons learned from the survey were:

- Over two-thirds of riders choose to pay their fares with either a 1-Day or 30-Day pass rather than cash. This is most likely due to the fact that Cherriotics does not permit free transfers when customers buy cash one-way fares.
- Riders who pay for Adult/Full fares use 1-Day or 30-Day passes slightly less frequently (70%) than Reduced/Youth customers (84%).
- The proportion of Adult/Full fare riders paying cash is much higher than that of Reduced/Youth fare riders (29% versus 7%, respectively). This may be due to the fact that Cherriotics Reduced/Youth customers are more regular riders where the Adult/Full customers may not ride often enough to warrant the purchase of a 30-Day pass.
- Since the average number of trips taken on a 1-Day or 30-Day pass is 2.8, that means that people mostly are not making long trips that require transfers.
- Riders of Routes 1X and 2X also usually use a pass to pay their fares (74% of Adult/Full and 65% of Reduced/Youth customers). This makes sense since most people riding the 1X and 2X are commuting to/from work and use a monthly pass.
- For Cherriotics local buses, most people take more than 2 trips per day if using a 1-Day, 30-Day, or Monthly Pass on Cherriotics local buses; the average number of trips is 2.8; 38 percent make 4 or more trips
- 56 percent of customers pay for their fare on board the bus; 36 percent pay at Cherriotics Customer Service at the Downtown Transit Center
- 66 percent of riders have smartphones; 89 percent have cell phones; 66 percent have email addresses; and only 13 percent have a landline phone
- 58 percent of riders don't have access to a car either as a driver or a passenger; this is much higher than rates reported by TriMet or LTD, which were 39 percent and 33 percent, respectively

- 35 percent of riders are students; the largest proportion of students go to high school (half of the students), then college (40 percent of the students); 83 percent of college students go to Chemeketa Community College
- Over 40 percent of riders are considered “minorities” for Title VI Equity Analysis purposes; at least 25 percent are Hispanic
- Gender identity is divided about equally between male and female riders
- Half of riders are ages 34 and under
- At least 24 percent of riders live below 150% FPL and are considered “low-income” for Title VI equity analysis purposes
- Over 25 percent of customers live in households where a language other than English is the primary spoken language
- At least 12 percent of riders speak English less than “very well”

Introduction and Purpose

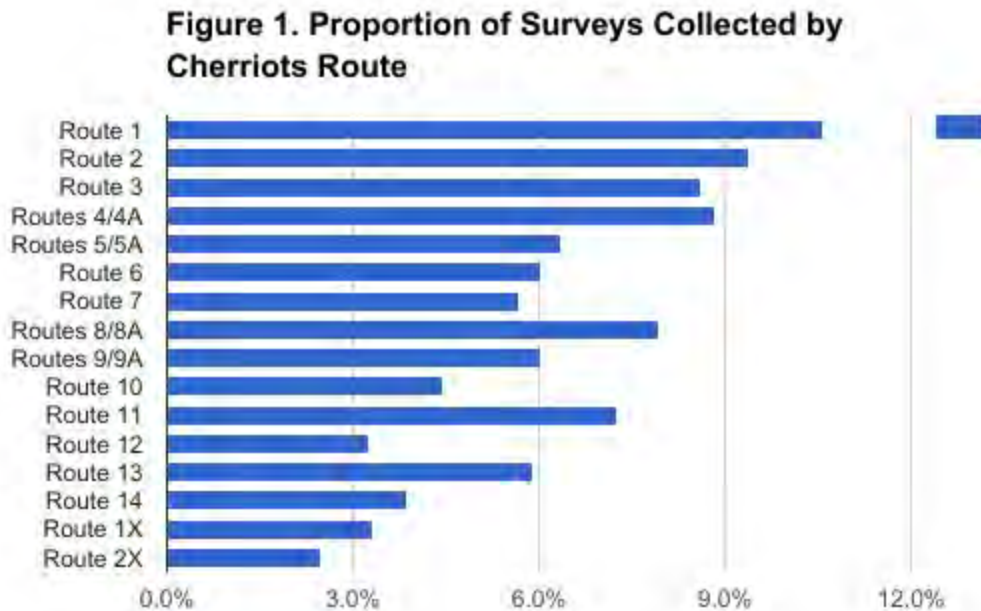
Every two years, Cherriot's staff have been requested by the Board of Directors to analyze the fares charged for the District's many services. In preparation for the analysis, a rider survey would be needed to determine how the users are paying for their fares and to determine any correlation to payment habits based on demographics such as income, age, and race. Cherriot's current Title VI Program and the FTA's Title VI Circular 4702.1B calls for an equity analysis to be made as part of the process of raising fares. The equity analysis would determine if any potential adverse effects exist for vulnerable populations such as minorities and low-income individuals. This requirement to perform such an analysis is documented in Federal Transit Administration (FTA) Title VI Circular No. 4702.1B and the District's Title VI Program adopted on May 22, 2014.

Please see Appendix A for the methodology, number of surveys collected, and statistical significance of the sample. Appendix B has copies of the survey instrument in English and Spanish.

The first half of the survey contained questions about what service people were riding at the time they took the survey and how they payed for their fares. The second half of the survey was optional since it asked sensitive questions such as race, gender, and household income. Even though it was said to be a voluntary section, over ninety percent of the surveys received responded to at least the race question.

Survey Results

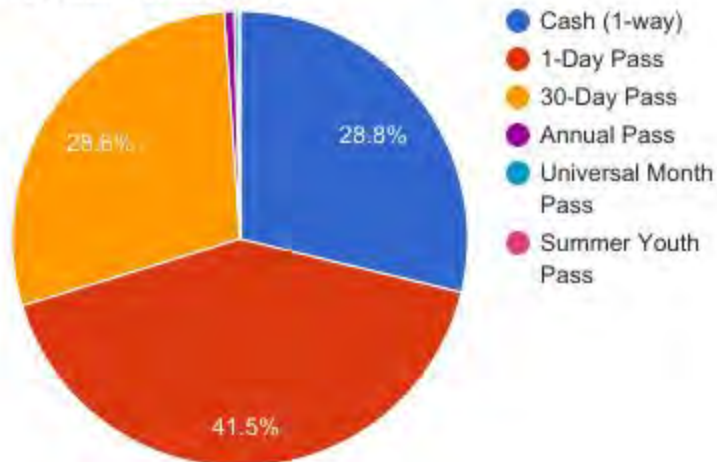
The following charts and descriptions summarize the results of the rider survey which ended in June, 2016. The first question was which service the person was riding at the time of survey. This was just to check the number of surveys collected by service/route so that staff could assess the validity of the responses. If a statistically significant number could not be obtained for each service, then that fact is stated instead of giving the resultant data. Figure 1 shows the answer to the question, "What service are you riding now?" for all Cherriots routes and Routes 1X and 2X.



With the exception of Routes 12 and 14, a statistically significant number of surveys was obtained from each route (see Table 1 above for details).

Figures 2 and 3 show how riders are generally paying for their fares on Cherriots local buses, not including Routes 1X and 2X.

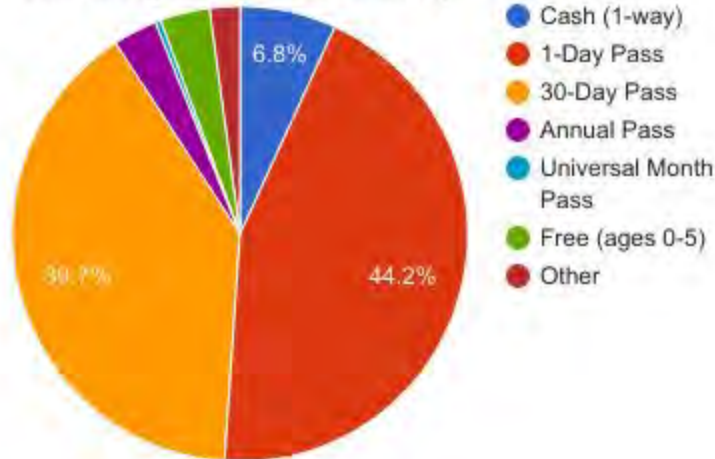
Figure 2. Fare Instruments Used by Adult/ Full Customers (Cherriots Local Buses, Excluding Routes 1X and 2X)



Passes are by far the most popular way passengers choose to pay their fares. In fact, over 70 percent of customers paying an Adult/Full fare use some kind of pass rather than paying for a cash one-way fare. Due to the absence of paid transfers in the system, customers usually pay for a 1-Day pass if they are traveling more than two trips during the day. 30-Day or month passes are also popular for regular users since those options offer significant savings over paying cash if a customer uses the bus for one round-trip on at least fourteen out of twenty-two days in a 30-day period.

Figure 3 displays which fare implements Cherriots Reduced/Youth customers are using.

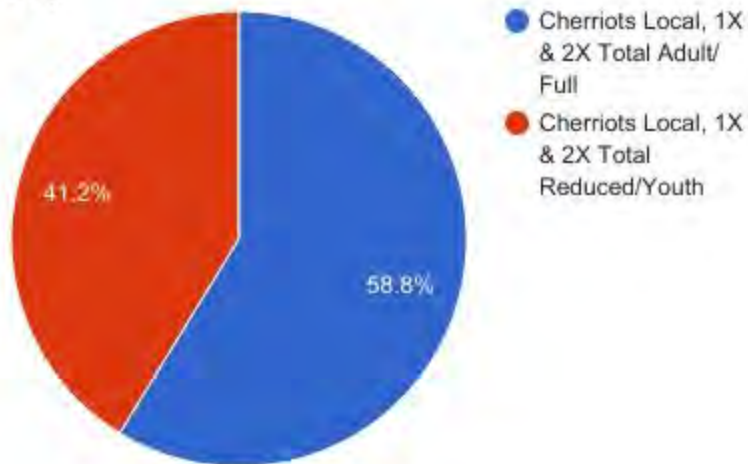
Figure 3. Fare Instruments Used by Reduced/ Youth Customers (Cherriots Local Buses, Excluding Routes 1X and 2X)



Riders paying Reduced/Youth fares are using passes more than Adult/Full fare customers (84% versus only 70%). This suggests that the elderly, disabled, and youth customers ride the bus very often and usually carry a 1-Day or 30-Day pass. A very small proportion of reduced/youth customers pay cash (6.8%). The Cherriots annual and universal month passes are rarely used on the Cherriots system at this time, but this data does not include Route 1X riders where the universal pass is used most often.

Figure 4 shows the split between Adult / Full and Reduced /Youth customers on all Cherriots local buses plus Routes 1X and 2X.

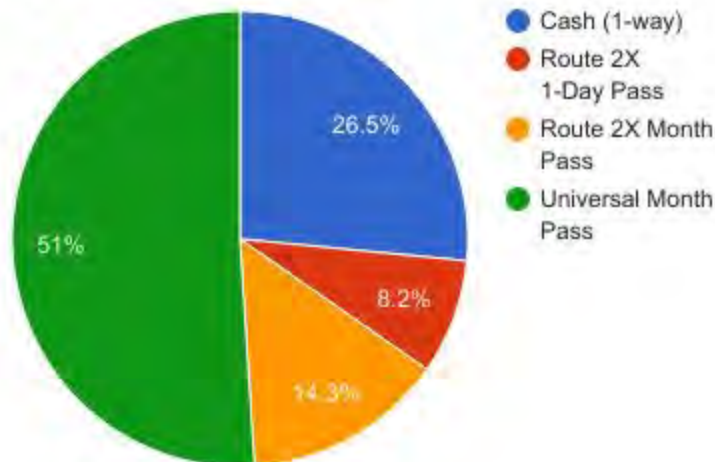
Figure 4. Proportion of Adult/Full Riders vs. Reduced/Youth Riders (Cherriots local, 1X, and 2X)



About 59 percent of riders pay Adult/Full fares versus only 41 percent paying Reduced/Youth fares. This shows that fare changes to the Adult/Full riders have an impact on a greater proportion of riders than changes to the Reduced/Youth category.

Figure 5 below shows the ways Adult/Full customers paid their fares on Routes 1X (Wilsonville / Salem Express) and 2X (Grand Ronde / Salem Express).

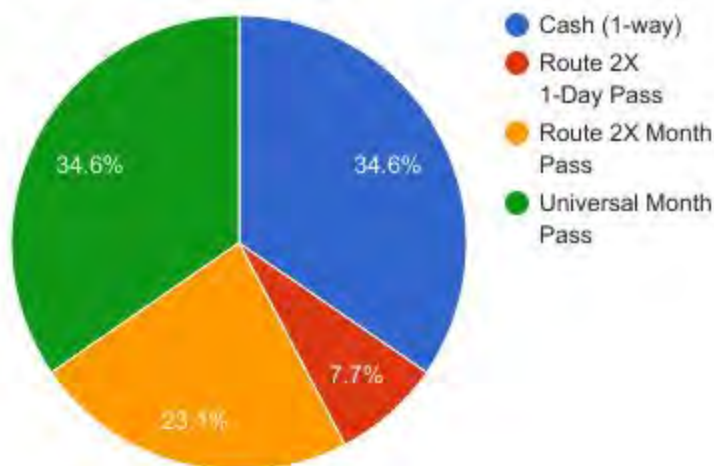
Figure 5. Fare Instruments Used by Routes 1X & 2X Adult/ Full Customers



Adult/Full fare customers on Routes 1X and 2X pay with cash at about the same rate as for Cherriots local buses (2.3 percentage points lower). The proportion of universal month passes would be much higher if the current state bus pass program were eliminated since many riders of Route 1X (Wilsonville / Salem Express) would use the universal month pass if they had to pay for their ride out of their own pockets. The universal month pass works on Route 1X, CARTS, and Cherriots local buses, but not on Route 2X. Therefore, Route 1X riders are using their version of a month pass at a much greater rate than Route 2X riders (51% vs. 14%, respectively). About a quarter of customers in the Adult/Full fare category paid by cash with approximately equal numbers on both Routes 1X and 2X services (6 on Route 1X and 7 on Route 2X).

Figure 6 shows how Reduced / Youth Customers are paying their fares on Routes 1X and 2X.

Figure 6. Fare Instruments Used by Routes 1X & 2X Reduced/Youth Customers



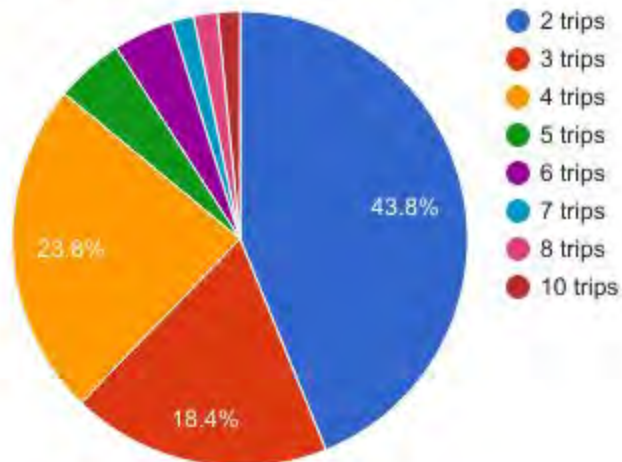
Compared to the Cherriots system overall, Routes 1X and 2X customers are choosing to pay their fares by cash much more than on Cherriots local buses (27.8 percent greater). This is likely due to the high number of irregular riders traveling between the Portland metro area and Salem on Route 1X.

The universal month pass is used by Reduced/Youth customers much more regularly than on Cherriots local buses (by more than 34 percent). Also of note by looking at the raw data, the universal month pass was not used by one Route 2X rider (either Adult / Full or Reduced / Youth) showing that no one is making regular trips between Wilsonville and Grand Ronde enough to warrant the purchase of a universal pass.

Only 7.7 percent of Route 2X riders pay using the Route 2X month or day pass, which could imply that people going to Grand Ronde are not transferring from Cherriots or CARTS very often when riding Route 2X. They may choose to park and ride or get dropped off in downtown Salem or Rickreal in order to access the service.

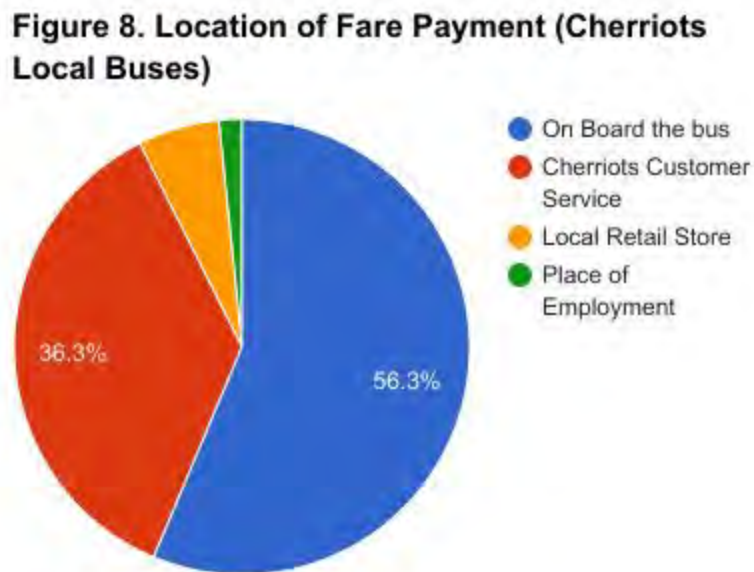
Figure 7 shows the number of trips made on passes over all fare categories on Cherriots local buses.

Figure 7. Number of Trips made if using a 1-Day, 30-Day, or Monthly Pass (Cherriots Local Buses)



Slightly less than a majority of pass users (43.8%) make more than two trips on their itinerary for the day. The average number of trips made on a 1-Day or 30-Day pass is 2.8 trips. This shows that many 30-day or month pass holders only make one round-trip per day. It also shows that the transfer rate is likely around forty percent systemwide, which is a result of the way the Cherriots network is built as a hub and spoke system around its transit centers. Although this question assumes that people can estimate the number of trips they make using their pass on a given day, it should be assumed that there is a large margin of error in these data.

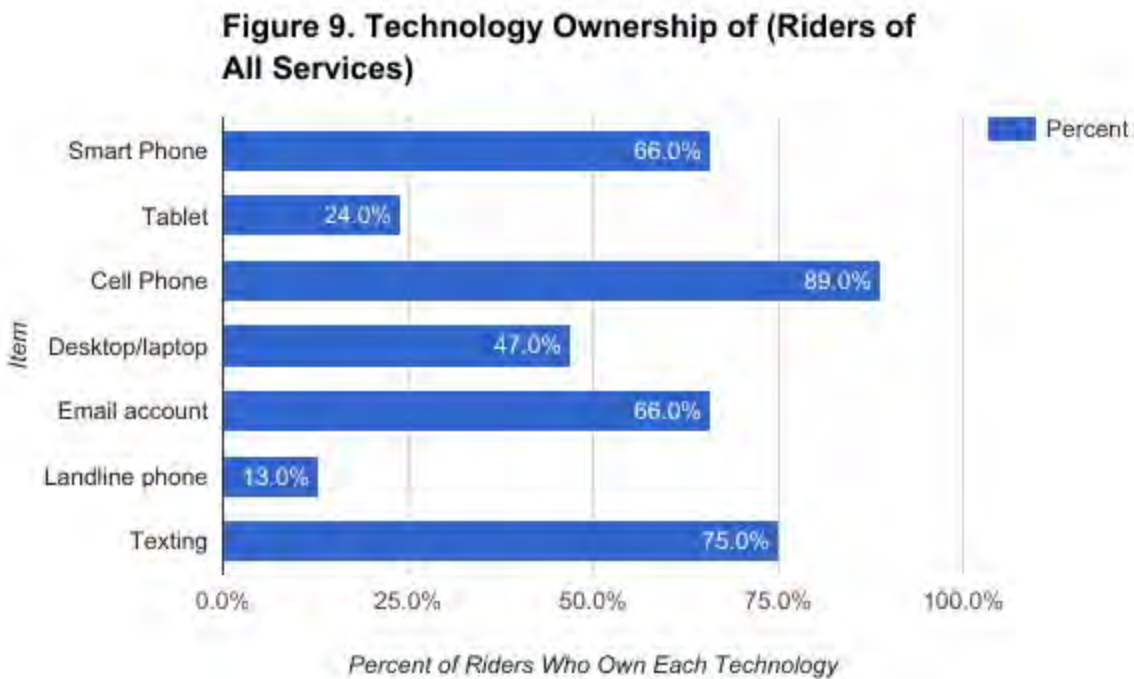
Figure 8 displays where riders report buying their fares.



As expected, a majority of users (56.3%) buy their fares on-board the bus. A surprisingly large number of riders buy their fares at Customer Service. This is a testament to the central location of the Customer Service office and the ease of purchasing fares at that location. It also shows the difficulty in purchasing fares at other locations since those locations are few and far between.

With only 5.8 percent of people buying their fares at a local retail store and 1.6 percent at their place of employment, this may show an opportunity for expansion of local retail locations and employer bus pass programs through which customers can purchase their 30-day or month passes. Just after the survey was conducted, Cherriots launched the State Bus Pass program (in July, 2016), which allows State employees who work in the Capitol Mall and downtown Salem areas to ride Cherriots, Routes 1X and 2X, and the West Salem Connector for free. These numbers will likely change with a State Bus Pass program in place.

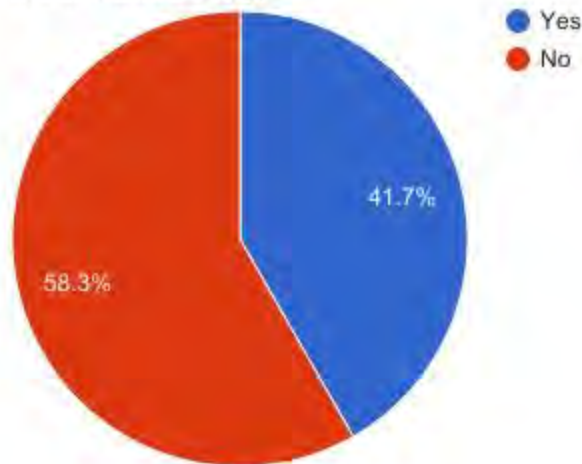
Figure 9 shows the technology items riders possess across all services and fare categories.



Just over 66 percent of riders own a smartphone. This suggests that a large majority of our riders would be able to utilize a realtime bus tracking app or a ticketing app. About the same proportion have email accounts and a slightly higher number have cell phone and texting capability (89% and 75%, respectively). Only half of systemwide riders own a desktop or laptop computer and a very small number own a landline phone (13%).

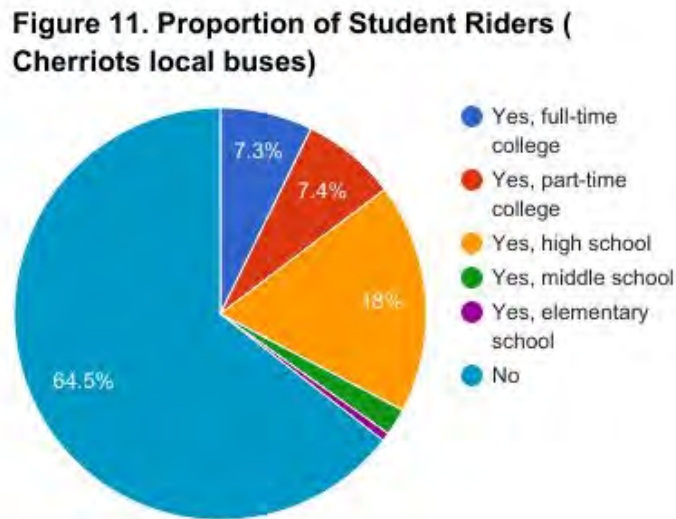
The survey asked people if they have a vehicle available to them either as a driver or a passenger). Figure 10 displays the result for Cherriots local bus riders.

**Figure 10. Personal Vehicle Availability of Riders
(Either as a Driver or a Passenger, Cherriots
local buses only)**



About 58 percent of the current riders do not have a vehicle available to them, which shows if transit isn't an option, they are likely walking or bicycling to their destination instead. They may also choose not to go to their desired destination. This is relatively high compared to numbers recently reported by TriMet and Lane Transit Districts, which showed 39 percent and 33 percent, respectively.

Figure 11 displays the proportion of student riders on Cherriotics local buses.



About one-third of the current riders are students with the majority high school, but closely followed by college students (16.0% and 14.6%, respectively). Very few middle and elementary school students ride the District's services at this time. Figure 12 shows the types of students riding compared with all student riders. This shows that about half of the students riding are high school students and about 41 percent are college students.

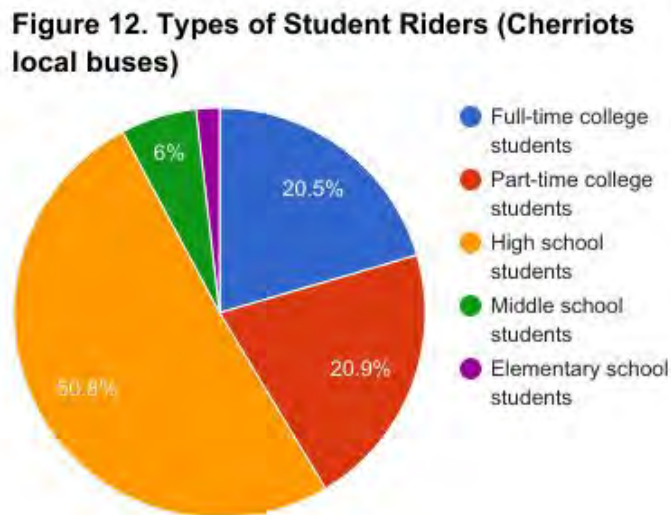
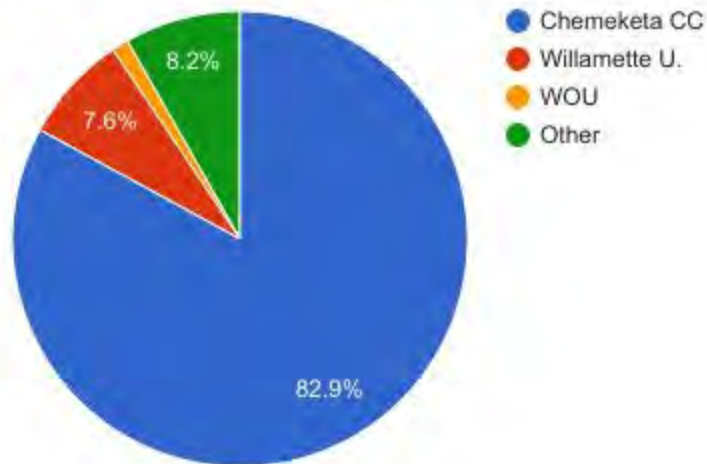


Figure 13 displays the colleges riders reported they attend, if they said they were a full-time or part-time student.

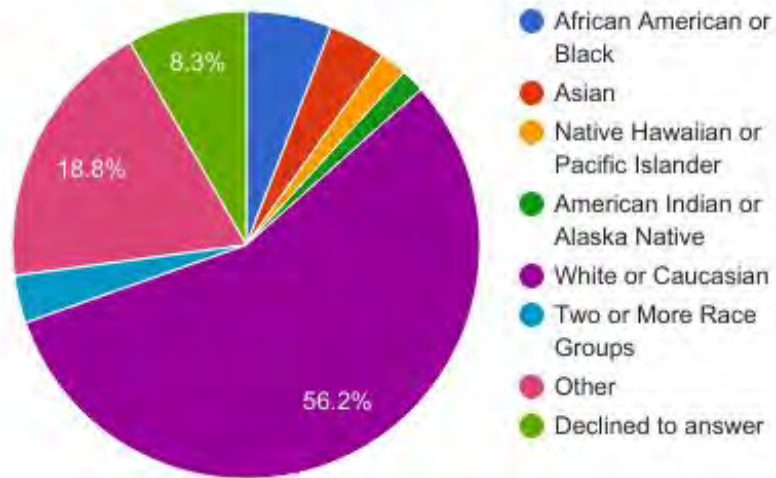
Figure 13. Colleges Student Riders Attend (Cherriots local buses)



About 8 out of ten Cherriots local bus college student riders attend Chemeketa Community College followed by other universities, Willamette University and Western Oregon University (WOU) 8.2 percent of college student riders attend a college not named in the local top three.

The first voluntary question asked of riders was their racial background. This was separated from ethnicity since someone could be white, black, or Asian and be Hispanic or Latino at the same time. Although riders were told that the following questions were voluntary, 88.9 percent of survey-takers provided answers. Figure 14 shows the racial background of riders.

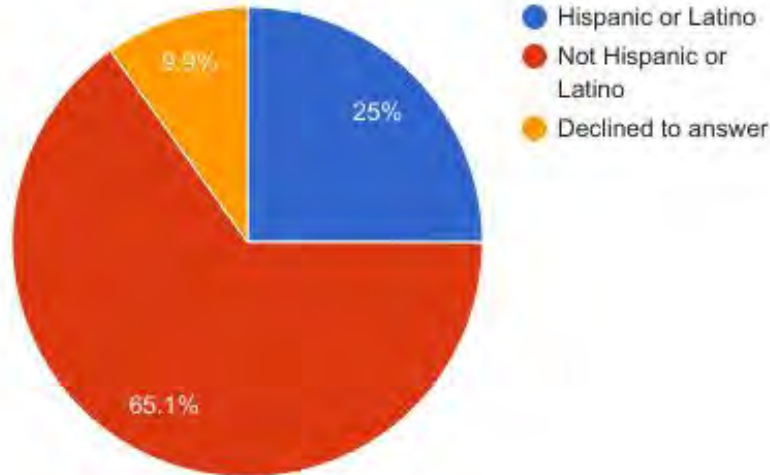
Figure 14. Racial Background of Cherriots Local Bus Riders



This shows that at least one-third (35.5%) of riders are non-white, which is slightly higher than the average for Marion and Polk Counties as reported in the 2017 Cherriots Title VI Program update (30.6%).

Figure 15 displays the Ethnicity of riders systemwide.

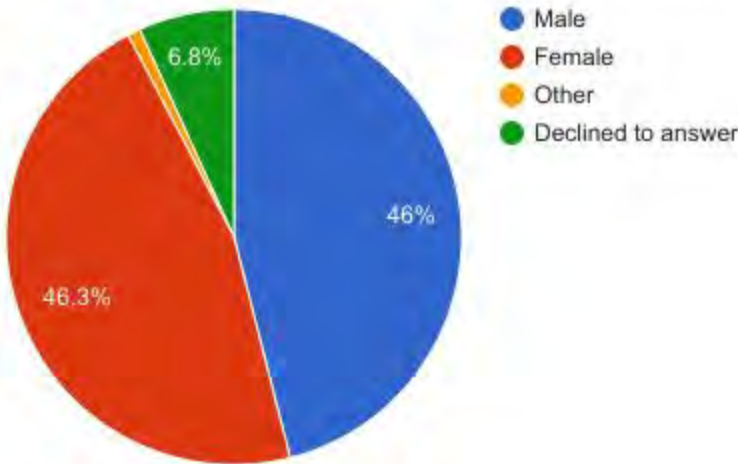
Figure 15. Ethnicity of Cherriots Local Bus Riders



This shows that at least one out of four riders has Hispanic or Latino heritage. For purposes of a fare equity analysis, SAMTD will consider all non-white and Hispanic riders as “minorities.” By combining the non-white customers in Figure 14 with the Hispanic customers in Figure 15, the survey shows that 40.3 percent of riders would be considered “minorities” for Title VI equity analysis purposes. This is higher than the average for Marion and Polk Counties as reported by the 2011-15 American Community Survey (ACS), which is 30.6 percent.

Figure 16 displays the gender of riders on Cherriots local buses.

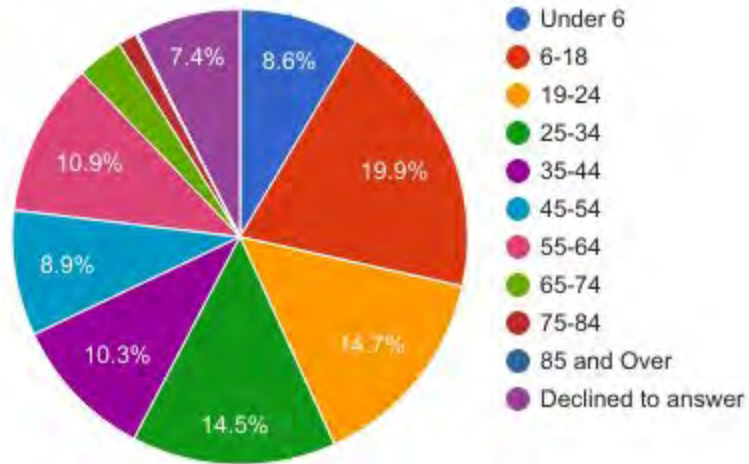
Figure 16. Gender of Cherriots Local Bus Riders



Customers on Cherriots local buses are spread about even between males and females.

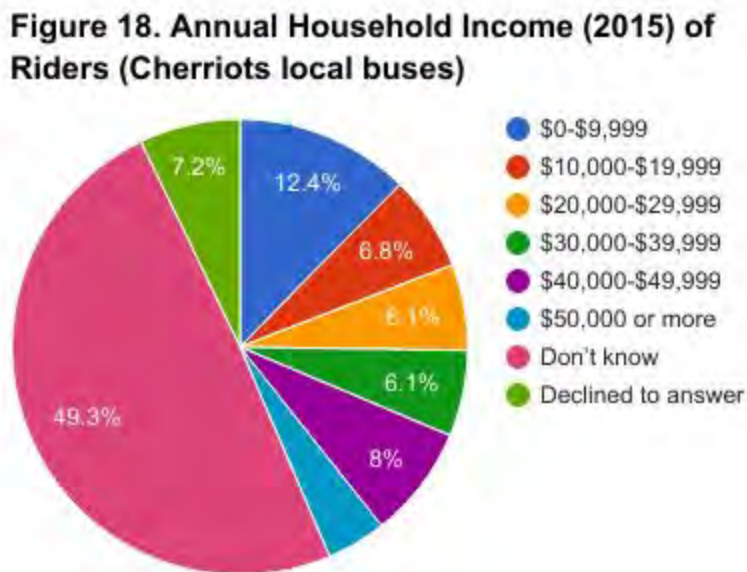
The ages of riders on Cherriots local buses are shown in Figure 17 below.

Figure 17. Age of Cherriots Local Bus Riders



Not one age range dominates another, but about half of system riders are aged 34 or less.

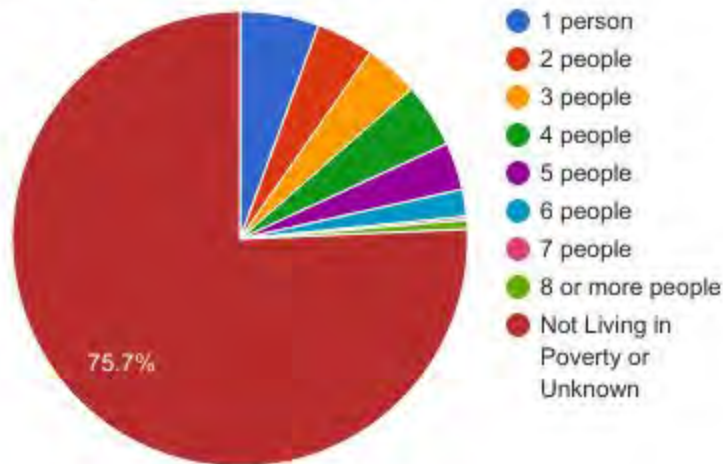
Figure 18 shows the 2015 estimated annual household incomes of riders.



Although most people didn't know or declined to answer this question, we have to take the data one step further in order to know how many people are living at or below 150 percent of the Federal Poverty Level (FPL). Cherriots uses 150% FPL to determine populations that are considered "low-income." Therefore, survey respondents' responses to household income were correlated to the number of people in the household and then compared to the definition of 150% of FPL shown in Table 2 to arrive at the results in Figure 19.

Figure 19 takes the household income data one step further by correlating it to the number of household members (shown in Figure 20).

Figure 19. Percent of Cherriots Local Riders Living in Poverty (150% Federal)

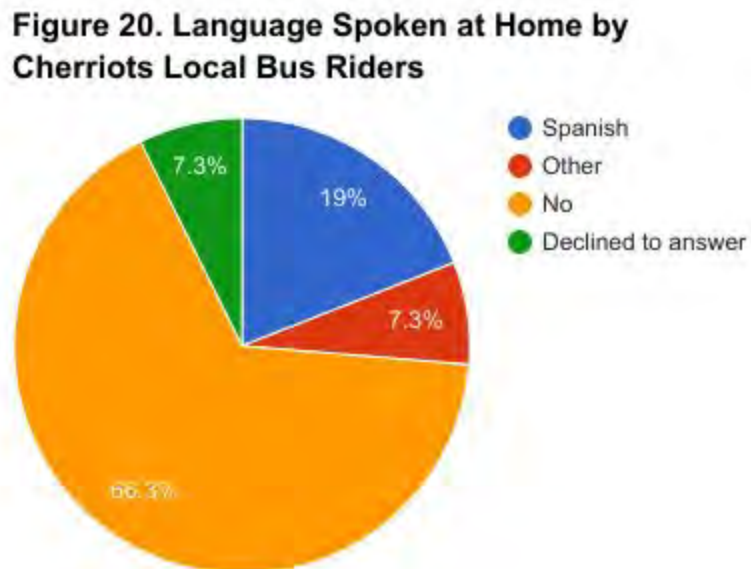


This shows that approximately 24 percent of riders live at or below 150% of the FPL. Table 1 shows the 2016 definition of FPL, inflated 150 percent:

Table 1. 150 Percent Federal Poverty (2016) Definition

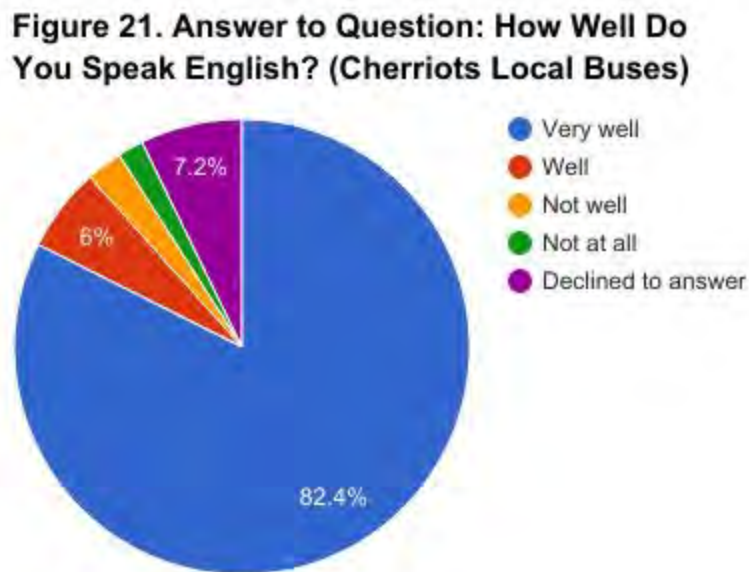
Number of Household Members	2016 Household Income
1 person	\$17,820
2 people	\$24,030
3 people	\$30,240
4 people	\$36,450
5 people	\$42,660
6 people	\$48,870
7 people	\$55,095
8 or more people	\$61,335

Figure 20 shows the answer to the question, “what language is primarily spoken at home?”



This shows that approximately a quarter of current riders speak another language at home with the most common language Spanish.

Figure 21 shows the answer to the question: “How well do you speak English?”



As shown in Figure 21, at least 82.4 percent speak English very well. About 12 percent struggle speaking English.

Summary and Conclusions

This survey was very useful to determine how Cherriots local bus riders are paying their fares. Because riders have to pay each time they board the bus unless they purchase a 1-Day or 30-Day pass, a supermajority of riders choose these methods to pay for their fares rather than with cash. The proportion of Adult/Full fare riders paying cash is much higher than that of Reduced/Youth fare riders (29% versus 7%, respectively). This may be due to the fact that Cherriots Reduced/Youth customers are more regular riders where the Adult/Full customers may not ride often enough to warrant the purchase of a 30-Day pass. Since the average number of trips taken on a 1-Day or 30-Day pass is 2.8, that means that people mostly are not making long trips that require transfers.

Riders of Routes 1X and 2X also usually use a pass to pay their fares (74% of Adult/Full and 65% of Reduced/Youth customers). This makes sense since most people riding the 1X and 2X are commuting to/from work and use a monthly pass.

- For Cherriots local buses, most people take more than 2 trips per day if using a 1-Day, 30-Day, or Monthly Pass on Cherriots local buses; the average number of trips is 2.8; 38 percent make 4 or more trips
- 56 percent of customers pay for their fare on board the bus; 36 percent pay at Cherriots Customer Service at the Downtown Transit Center
- 66 percent of riders have smartphones; 89 percent have cell phones; 66 percent have email addresses; and only 13 percent have a landline phone
- 58 percent of riders don't have access to a car either as a driver or a passenger; this is much higher than rates reported by TriMet or LTD, which were 39 percent and 33 percent, respectively
- 35 percent of riders are students; the largest proportion of students go to high school (half of the students), then college (40 percent of the students); 83 percent of college students go to Chemeketa Community College
- Over 40 percent of riders are considered "minorities" for Title VI Equity Analysis purposes; at least 25 percent are Hispanic
- Gender identity is divided about equally between male and female riders
- Half of riders are ages 34 and under
- At least 24 percent of riders live below 150% FPL and are considered "low-income" for Title VI equity analysis purposes
- Over 25 percent of customers live in households where a language other than English is the primary spoken language
- At least 12 percent of riders speak English less than "very well"

Appendix A: Survey Methodology and Statistical Significance

Methodology

Cherriots performed a survey of its riders in May and June 2016 to collect this information from riders of all the District's services. In order to comply with the District's Title VI policies for fare changes, staff had to gather fare payment data and rider demographics at a statistically significant number of surveys on all Cherriots local bus services.

Bilingual temporary employees were hired to ride the buses and collect surveys from customers. Also, one bilingual customer service staff person was utilized to cover some early morning trips. The goal was to cover the whole span of service on each route in order to survey the riders who use the buses in the early morning hours, commute hours, the middle of the day, and late evening service.

A statistically significant number of surveys were collected from users of the Cherriots local buses in most cases. An attempt was made to collect a statistically significant number of surveys from riders of the District's demand responsive services such as the West Salem Connector, CARTS, RED Line, and CherryLift, but it proved very costly and ineffective. Therefore, only a limited number of surveys were collected on these services. This report focuses entirely on the surveys obtained on Cherriots local buses as well as regional express routes 1X and 2X (Wilsonville / Salem Express and Grand Ronde / Salem Express, respectively). A statistically significant sample was achieved on all but two Cherriots local buses. Table 1 below contains a summary of the number of surveys collected on each individual route.

Table 1. Number of Surveys Collected on Each Cherrriots Local Bus Route

Cherriots Local Bus Route Number	Sample Size Needed for Statistical Significance (95% confidence interval)	Surveys Collected
1	92	133
1X/2X	67	77
2	89	121
3	85	112
4/4A	85	108
5/5A	90	90
6	79	79
7	71	77
8/8A	86	100
9/9A	79	79
10	55	57
11	92	92
12*	55	44*
13	80	80
14*	52	51*
Cherriots Local Bus Total:	1157	1300

*Routes 12 and 14 did not meet the threshold for statistical significance.

Difficulty of Achieving Statistically Significant Numbers on Some Routes

As shown in Table 1, only Routes 12 and 14 did not achieve enough surveys to be considered statistically significant data. On Route 12, forty-four surveys were collected after spending 21 hours of labor riding the buses. The low ridership level made it very costly to obtain surveys on this route that runs only once an hour. Also, many people refused to take the survey over and over, so we were forced to stop riding the buses after so many hours had past with poor results. Route 14 also was short, but just by one survey (51 out of 52 were obtained). This is also a low ridership route and is difficult to get people to take the survey multiple times.

Although a statistically significant number of surveys was not obtained on two Cherriots routes, the overall total (1,300) was twelve percent greater than the total required to meet the sample size goal at the 95% confidence interval. Therefore, the survey results are valid for the system as a whole.

Survey Instrument

The survey instrument or questionnaire was developed using examples from nearby transit agencies (TriMet and Lane Transit District) which have conducted such surveys in the last year. Questions were developed in a format that would take up to two minutes for the surveyor to walk through the survey with riders. In order to maintain uniformity and encourage people of all races, ages, genders, etc. to participate, bilingual (English and Spanish) temporary employees were hired to conduct the survey on-board the buses, although passengers were also allowed to take the survey and return it to the surveyor or Customer Service at the Downtown Transit Center. Copies of the survey instrument in English and Spanish can be found in **Appendix B**.

Questions were asked not only to determine how they paid their fare, but what kind of fare instrument (cash, day pass, or multi-day pass) they purchased. If children were traveling with parents, separate surveys were filled out for each child, including infants. The location where the customer purchased the fare was also important to see where different people choose to buy their fares. In order to plan for future fare payment methods such as a smartphone flash pass, the types of technology owned by the customers was also a question asked. Finally, whether the person had a vehicle available to make the trip either as a driver or a passenger and whether the person was a current student was asked. These details help District staff understand the methods that the current customer base pays for their fares and how they may choose to pay if certain technology options were available to them.

The second half of the survey was optional since it asked sensitive questions such as race, gender, and household income. Even though it was said to be a voluntary section, over ninety percent of the surveys received responded to at least the race question. The following is a list of voluntary questions asked:

- Race
- Ethnicity (Latino or not Latino)
- Gender
- Age
- Household income
- Number of people living in household
- Language primarily spoken at home other than English
- Ability level of spoken English

Appendix B: Copies of the Survey Instrument in English and Spanish

PLEASE COMPLETE THIS SALEM-KEIZER TRANSIT RIDER SURVEY

Dear Rider: Salem-Keizer Transit thanks you for riding. In order to plan for improved ways to pay your fare, we need your help. Please take a moment to fill out this survey and return it to your driver or to Cherriots Customer Service (if traveling with children, please fill out a survey for them separately). Thank you for your time!

1. What service are you riding now? (Please check one and indicate the route number, if applicable)

- Cherriots Local Route # _____
 West Salem Connector (WSC)
 Route 1X
 Route 2X
 CARTS Route # _____
 RED Line Shopper Shuttle
 RED Line Dial-a-Ride
 CherryLift

2. How did you pay your fare for this trip? (check one)

	CASH (1-WAY)	1-DAY PASS	30-DAY/ MONTHLY PASS	10-RIDE TICKET BOOK	ANNUAL PASS	UNIVERSAL MONTHLY PASS
Cherriots or WSC Adult / Full Fare	<input type="checkbox"/> \$1.60	<input type="checkbox"/> \$3.25	<input type="checkbox"/> \$45.00	N/A	<input type="checkbox"/> \$540.00	<input type="checkbox"/> \$85.00
Cherriots or WSC Reduced & Youth	<input type="checkbox"/> \$0.80	<input type="checkbox"/> \$1.50	<input type="checkbox"/> \$22.50	N/A	<input type="checkbox"/> \$270.00	<input type="checkbox"/> \$42.50
CARTS Adult / Full Fare	<input type="checkbox"/> \$2.25	<input type="checkbox"/> \$4.50	<input type="checkbox"/> \$60.00	N/A	N/A	<input type="checkbox"/> \$85.00
CARTS Reduced & Youth	<input type="checkbox"/> \$1.50	<input type="checkbox"/> \$3.00	<input type="checkbox"/> \$30.00	N/A	N/A	<input type="checkbox"/> \$42.50
Route 1X Adult / Full Fare	<input type="checkbox"/> \$3.00	N/A	N/A	N/A	N/A	<input type="checkbox"/> \$85.00
Route 1X Reduced & Youth	<input type="checkbox"/> \$1.50	N/A	N/A	N/A	N/A	<input type="checkbox"/> \$42.50
Route 2X Adult / Full Fare	<input type="checkbox"/> \$3.00	<input type="checkbox"/> \$6.00	<input type="checkbox"/> \$85.00	N/A	N/A	N/A
Route 2X Reduced & Youth	<input type="checkbox"/> \$1.50	<input type="checkbox"/> \$3.00	<input type="checkbox"/> \$42.50	N/A	N/A	N/A
RED Line Shopper Shuttle	<input type="checkbox"/> \$1.25	N/A	N/A	<input type="checkbox"/> \$12.50	N/A	N/A
RED Line Dial-a-Ride	<input type="checkbox"/> \$3.20	N/A	N/A	<input type="checkbox"/> \$32.00	N/A	N/A
CherryLift	<input type="checkbox"/> \$3.20	N/A	N/A	N/A	N/A	N/A
Other Passes	<input type="checkbox"/> Summer Youth Pass <input type="checkbox"/> Free (ages 0-5) <input type="checkbox"/> Other _____					

3. If you are using a 1-Day, 30-Day, or monthly pass, how many one-way trips will you make on it today? _____

4. Where did you pay for your fare? (check one)

- On board the bus
 Cherriots Customer Service
 Local retail store
 Place of employment
 Other _____
 N/A

5. Do you have the following? (check all that apply)

- Smart Phone
 Tablet
 Cell Phone
 Desktop/Laptop
 Email account
 Landline phone
 Texting

6. Do you have a vehicle you could have used to make this trip either as the driver or as a passenger? Yes No

7. Are you a student? (check one) Yes, full-time college Yes, part-time college Yes, high school Yes, middle school Yes, elementary school No

If you are a college student, which college? Chemeketa CC Willamette U. WOU Other _____

The following questions are voluntary, but will help us meet the needs of future riders.

8. What is your race? (check one) African American or Black Asian Native Hawaiian or Pacific Islander American Indian or Alaska Native White or Caucasian Two or More Race Groups Other

9. What is your ethnicity? (check one) Hispanic or Latino Not Hispanic or Latino

10. Are you? (check one) Male Female Other

11. What is your age? _____

12. What was your annual gross household income before taxes in 2015? This is the combined income of each person living in your home, whatever the source. (check one) \$0-\$9,999 \$10,000-\$19,999 \$20,000-\$29,999 \$30,000-\$39,999 \$40,000-\$49,999 \$50,000 or more Don't know

13. How many people including yourself live in your household? _____

14. Do you primarily speak a language other than English at home? Yes, we speak _____ at home No

¿Habla un idioma que no sea inglés? Sí. ¿Que idioma es ese? _____ No

Говорите ли вы дома на других языках, кроме Английского? Да, мы говорим на _____ дома Нет

15. How well do you speak English? Very Well Well Not Well Not at all

¿Cuan bien habló el inglés? Muy bien Bien No bien No hablo inglés

На сколько хорошо вы говорите на английском? Очень хорошо Хорошо Не очень хорошо Совсем не говорю

POR FAVOR LLENE ESTA ENCUESTA PARA USUARIOS DEL SERVICIO DE TRANSPORTE SALEM-KEIZER

Estimado usuario del servicio de transporte: El tránsito de Salem-Keizer le agradece por usar nuestro servicio. Para que podamos planear mejores formas de pago de la tarifa requerimos de su ayuda. Por favor tome unos minutos para llenar esta encuesta y entréguela al conductor o a Servicio al Cliente (si viaja con niños, llene una encuesta para ellos a parte). ¡Gracias por su tiempo!

1. ¿Qué servicio utiliza usted ahora? (Por favor marque uno e indique el número de ruta, si aplica)

- Cherriots Local Ruta # _____
 Salem Oeste Conector (WSC)
 Ruta 1X
 Ruta 2X
 CARTS Ruta # _____
 Línea RED Servicio de Autobús para ir de compras
 Línea RED Llamar y solicitar transporte
 CherryLift

2. ¿Cómo pagó su tarifa para este viaje? (marque uno)

	EFFECTIVO (VIAJE DE IDA)	1-DÍA	30-DÍAS/ MENSUALMENTE PASE	10-TRASLADOS PASE TALONARIO	ANUAL PASE	UNIVERSAL MENSUALMENTE PASE
Tarifa Completa/Adulto Cherriots o WSC	<input type="checkbox"/> \$1.60	<input type="checkbox"/> \$3.25	<input type="checkbox"/> \$45.00	N/D	<input type="checkbox"/> \$540.00	<input type="checkbox"/> \$85.00
Joven y con Descuento Cherriots o WSC	<input type="checkbox"/> \$0.80	<input type="checkbox"/> \$1.50	<input type="checkbox"/> \$22.50	N/D	<input type="checkbox"/> \$270.00	<input type="checkbox"/> \$42.50
Tarifa Completa/Adulto CARTS	<input type="checkbox"/> \$2.25	<input type="checkbox"/> \$4.50	<input type="checkbox"/> \$60.00	N/D	N/D	<input type="checkbox"/> \$85.00
Joven y con Descuento CARTS	<input type="checkbox"/> \$1.50	<input type="checkbox"/> \$3.00	<input type="checkbox"/> \$30.00	N/D	N/D	<input type="checkbox"/> \$42.50
Tarifa Completa/Adulto Ruta 1X	<input type="checkbox"/> \$3.00	N/D	N/D	N/D	N/D	<input type="checkbox"/> \$85.00
Tarifa Completa/Adulto Ruta 1X	<input type="checkbox"/> \$1.50	N/D	N/D	N/D	N/D	<input type="checkbox"/> \$42.50
Tarifa Completa/Adulto Ruta 2X	<input type="checkbox"/> \$3.00	<input type="checkbox"/> \$6.00	<input type="checkbox"/> \$85.00	N/D	N/D	N/D
Joven y con Descuento Ruta 2 X	<input type="checkbox"/> \$1.50	<input type="checkbox"/> \$3.00	<input type="checkbox"/> \$42.50	N/D	N/D	N/D
Transporte para ir de compras Línea RED	<input type="checkbox"/> \$1.25	N/D	N/D	<input type="checkbox"/> \$12.50	N/D	N/D
Llamar y solicitar servicio línea RED	<input type="checkbox"/> \$3.20	N/D	N/D	<input type="checkbox"/> \$32.00	N/D	N/D
CherryLift	<input type="checkbox"/> \$3.20	N/D	N/D	N/D	N/D	N/D
Otros Pases	<input type="checkbox"/> Pase de Verano para Joven <input type="checkbox"/> Gratis (edad 0-5) <input type="checkbox"/> Otro _____					

3. Si usa un pase de 1 día (1-Day Pass), ¿cuántos viajes de ida puede hacer hoy con él? _____

4. ¿Dónde pagó usted su tarifa? (marque uno)

- A bordo del autobús
 Servicio al Cliente Cherriots
 Tienda al detalle local
 Lugar de empleo
 Otro _____
 N/D

5. ¿Tiene usted lo siguiente? (marque todo lo que aplique)

- Teléfono inteligente
 Tableta
 Teléfono celular
 Computadora de escritorio/laptop
 Cuenta de correo electrónico
 Teléfono de línea terrestre
 Teléfono
 Texteo

6. ¿Tiene usted un vehículo que podría haber usado para realizar este viaje ya sea como chofer o pasajero? Sí No

7. ¿Es usted estudiante? (marque uno) Sí, colegio universitario completo Sí, colegio universitario a tiempo parcial Sí, preparatoria Sí, secundaria Si, primaria No

Si usted es un estudiante de colegio universitario, ¿cuál colegio?

- Chemeketa CC
 Willamette U.
 WOU
 Otro _____

Las siguientes preguntas son voluntarias, pero nos ayudarán a satisfacer las necesidades de transportistas futuros.

8. ¿Cuál es su raza? (marque uno) Afroamericano o Negro Asiático Hawaiano Nativo o de las Islas del Pacífico Indio Americano o Nativo de Alaska Blanco o Caucásico Dos o más grupos de raza Otro

9. ¿Cuál es su etnia? (marque uno) Hispano o Latino No Hispano o Latino

10. ¿Es usted? (marque uno) Hombre Mujer Otro

11. ¿Qué edad tiene? _____

12. ¿Cuál fue el ingreso bruto familiar anual antes de los impuestos en 2015? Este es el ingreso combinado de cada persona que vive en su hogar, independientemente del origen. (marque uno) \$0-\$9,999 \$10,000-\$19,999 \$20,000-\$29,999 \$30,000-\$39,999 \$40,000-\$49,999 \$50,000 o más No sabe

13. ¿Cuánta gente, usted incluido, vive en su hogar? _____

14. Do you primarily speak a language other than English at home? Yes, we speak _____ at home No

¿Habla un idioma que no sea inglés? Sí. ¿Que idioma es ese? _____ No

Говорите ли вы дома на других языках, кроме Английского? Да, мы говорим на _____ дома Нет

15. How well do you speak English? Very Well Well Not Well Not at all

¿Cuan bien habló el inglés? Muy bien Bien No bien No hablo inglés

На сколько хорошо вы говорите на английском? Очень хорошо Хорошо Не очень хорошо Совсем не говорю

Attachments J through M: Title VI Equity Analyses

The following are copies of the equity analyses performed for fare and service changes between June 1, 2014 and May 31, 2017:

Attachment J: Moving Forward Phase I Service Change Equity Analysis

Attachment K: Cherriots Regional Title VI Equity Analysis

Attachment L: January 2015 Fare Change Public Engagement and Title VI Equity Analysis

Attachment M: Route 15X Restoration Title VI Equity Analysis

Moving Forward Phase I Service Change Equity Analysis

Salem-Keizer Transit

May 28, 2015

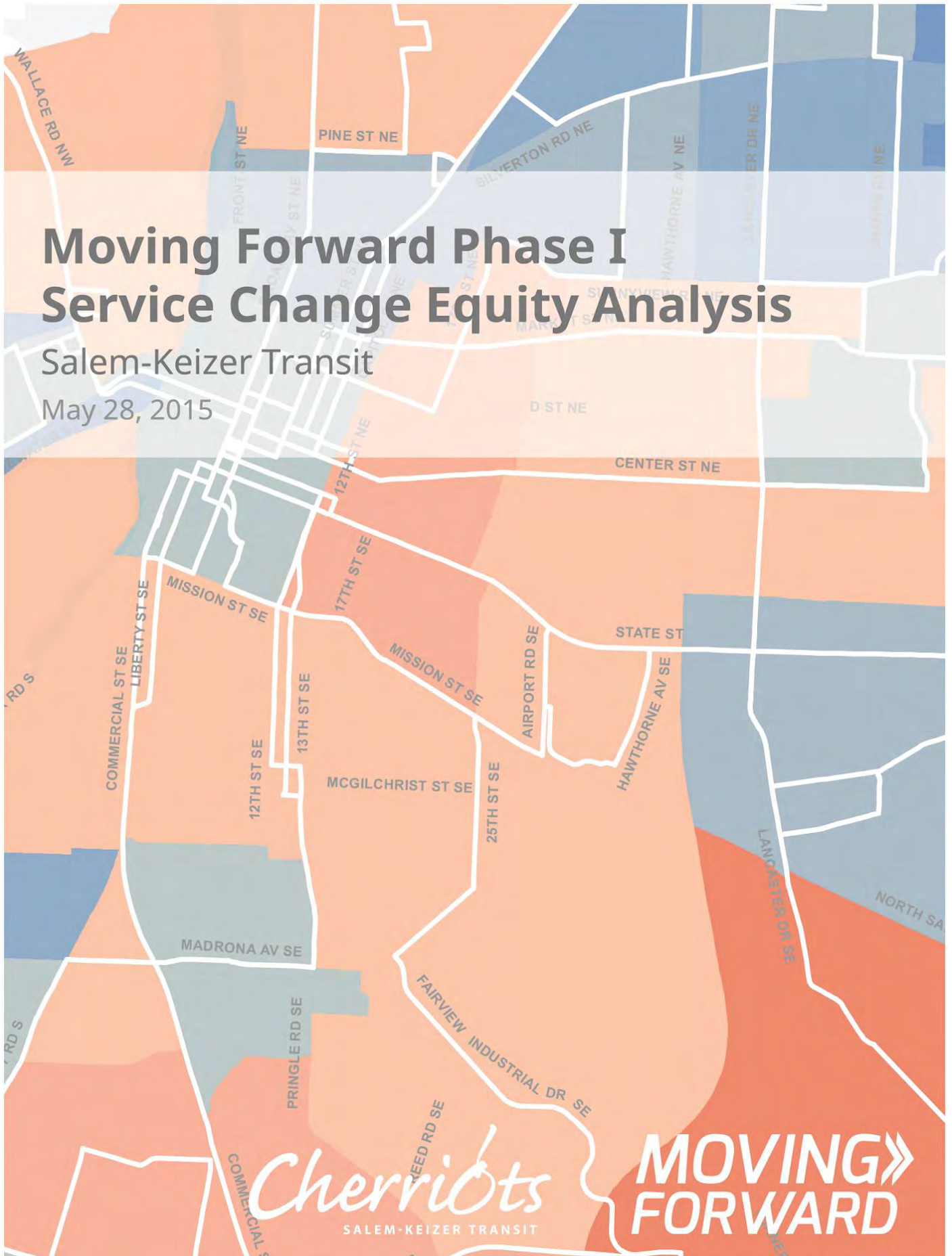




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11. Summary and Discussion

MOVING 
FORWARD

1. Background

The Moving Forward Phase I Service Change is a comprehensive plan of improvements to the Cherriots bus system, a service of Salem Area Mass Transit District (SAMTD).

The plan was based on the recommendation of the Comprehensive System Analysis (CSA) performed by Jarrett Walker and Associates in 2014. Their research included a service analysis, surveys, polls, and workshops.

Staff shared the recommendations of the CSA with the public during the first round of outreach from July-October 2014. Based on feedback received and additional planning analysis, staff heavily revised the recommendations to create a modified proposal. Staff brought this proposal back to the public for a second round of outreach, which took place from January-February 2015.

SAMTD staff modified the proposal based on public feedback and the Salem-Keizer Transit Board of Directors approved the updated proposal on February 26, 2015. The service change is slated to go into effect on September 8, 2015.

2. Equity Analysis

As a recipient of Federal financial assistance, SAMTD must ensure that service changes – both increases and reductions – comply with Title VI 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 FTA has provided specific implementing guidelines and regulations for complying with Title VI in Circular 4702.1B (“Circular”). Due to the interrelated nature of race/ethnicity and income, the Circular instructs transit agencies to consider impacts on low-income populations as well as minority populations; the assessment of potential Title VI issues related to service changes is completed through a service equity analysis.

3. SAMTD Title VI Compliance

In the spring of 2014, SAMTD updated its Title VI program. The program outlines agency policies, definitions, and procedures for complying with Title VI and performing equity analyses. This includes the agency's Major Service Change, Adverse Effects, Disparate Impact, and Disproportionate Burden policies.

3.1. Major Service Change Policy

All changes in service meeting the definition of Major Service Change are subject to a Title VI Equity Analysis. A Major Service Change is defined as:

1. Either a reduction or an expansion in service of:
 - a. 25 percent or more of the number of transit route miles, or;
 - b. 25 percent or more of the number of transit vehicle revenue hours, computed on a daily basis for the day of the week on which the change is made, or;
2. A new transit route is established.
3. If changes in service on a route to be effective at more than one date within any fiscal year would equal or exceed 1(a) and/or 1(b) above, the changes in total will be considered a Major Service Change, and a Disparate Impact Analysis will be completed in advance of action on the proposed change.

3.2. Adverse Effects Definition

Adverse effects of Major Service Changes are defined as a decrease in the level of transit service (span in days and/or hours, and/or frequency) and/or decreased access to transit service defined as an increase of the access distance to beyond one-quarter mile of bus stops.

3.3. Disparate Impact Policy

Testing for Disparate Impact evaluates effects on minority riders or populations as compared to non-minority riders or populations. "Minority" is defined as all persons who identify as being part of a racial/ethnic group besides white, non-Hispanic.

3.3.1. Disparate Impact Definition

1. A Major Service Change to a route will be considered to have a disparate impact if condition a, b, and either condition c or d below is found to be true:
 - a. The percentage of impacted minority population in the service area of the route exceeds the percentage of minority population of the SAMTD District as a whole, and;
 - b. If the percentage of impacted minority population differs from the percentage of impacted non-minority population by more than 20 percent, the overall impact of changes will be considered disparate.
 - c. In the event of service reductions, the service change has an adverse effect on the minority population in the service area of the route.
 - d. In the event of service additions, the addition is linked to other service changes that have adverse effects on the minority population in the service area of the route, or; the service addition on the subject route is linked with a service change(s) on other route(s) that have adverse effects on the minority population in the service area of that route or routes.

3.4. Disproportionate Burden Policy

Testing for a Disproportionate Burden evaluates potential effects on low-income riders or populations, defined as riders or populations at or below 100% of the federal poverty level.

3.4.1. Disproportionate Burden Definition*

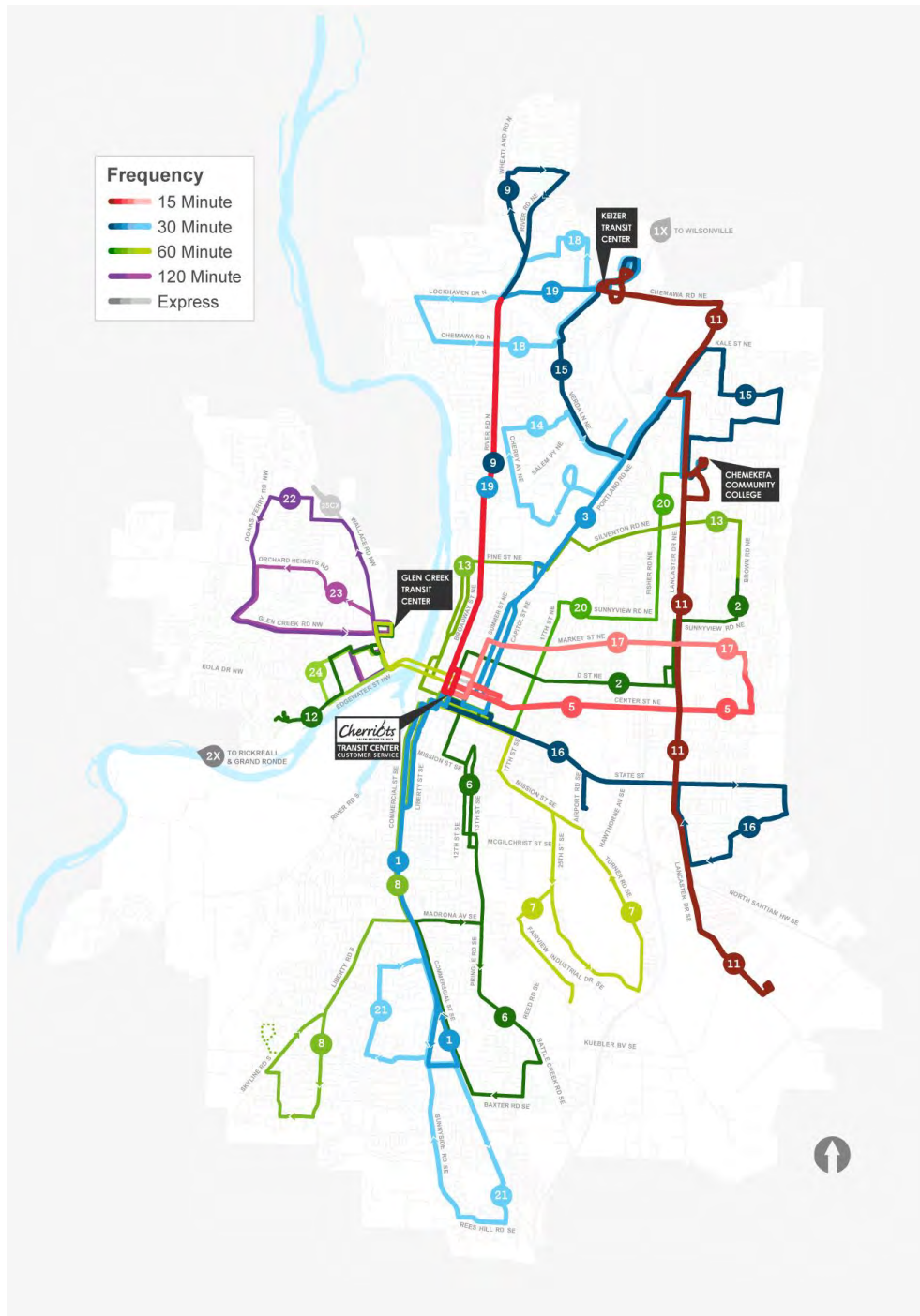
1. A Major Service Change to a route will be considered to have a [disproportional burden] if condition a, b, and either condition c or d below is found to be true:
 - a. The percentage of impacted [low-income] population in the service area of the route exceeds the percentage of [low-income] population of the SAMTD District as a whole, and;
 - b. If the percentage of impacted [low-income] population differs from the percentage of impacted [non-low income] population by more than 35 percent, the overall impact of changes will be considered [disproportional].
 - c. In the event of service reductions, the service change has an adverse effect on the [low-income] population in the service area of the route.
 - d. In the event of service additions, the addition is linked to other service changes that have adverse effects on the [low-income] population in the service area of the route, or; the service addition on the subject route is linked with a service change(s) on other route(s) that have adverse effects on the [low-income] population in the service area of that route or routes.

* SAMTD's official Disproportionate Burden policy unintentionally refers to disparate impacts and minorities instead of disproportionate burdens and low-income populations. This language has been modified in the above definition to clarify the intended definition.

4. Cherriots Current Service

The current Cherriots service has limited frequent (15-minute) service, especially during the midday and evenings (see Figure 1). Most routes have 30-min, 60-min, or 120-min headways. Schedules are not consistent throughout the day, as service is decreased during the midday and evenings. The entire system relies on a pulse system, where many busses depart the Downtown Transit Center at the same time. Additionally, considerable slack is built into most route schedules. As a result, buses on average spend 32% of their time sitting, either at transit centers or at other time points mid-route. There are almost a dozen large, one-way loops, and no crosstown routes travel through downtown Salem.

Figure 1. Current Cherriots service midday frequency.



5. Moving Forward Phase I Initial Proposal

SAMTD's goals for the Comprehensive Service Analysis were to find ways in which the Cherris system could be more efficient and serve riders better. Jarrett Walker and Associates made recommendations on how the District could accomplish these goals, and these have become the foundation of the Moving Forward project. See Figure 2 for a map of the initial proposal.



Increase frequency on busy routes

In the current Cherris system, the District spends 65% of its resources on ridership-building routes that are focused on building more ridership, and the remainder on coverage routes, which go deep into neighborhoods and have lower expected ridership. In order to build a system that works better for most riders, this proposal shifts some of the resources from coverage routes to ridership routes—75% of resources will be dedicated to ridership-building routes, as described in Salem-Keizer Transit Board of Directors' recently-adopted Urban Service Design Principles policy. The result of this change is increased frequency on busy routes that serve jobs, shopping, and places people go. Buses will be scheduled every 15 minutes on these routes.



Consistent schedule throughout day

During the Comprehensive System Analysis, Jarrett Walker and Associates found ridership does not peak during the morning and evening commutes. Instead, ridership is fairly consistent throughout the day. In the proposal, the frequency of buses will stay consistent from 6 a.m. until 7 p.m., with 15-minute routes dropping to 30 minutes until 9 p.m.



More crosstown routes

This proposal includes more direct routes, which allows for fewer transfers and results in reduced travel time. Staff have designed multiple crosstown routes that stop at the Downtown Transit Center and then continue on instead of forcing all riders to transfer. There are routes in the proposal that run from South Salem to West Salem, West Salem to Lancaster Drive, and Keizer to South Salem.



Less delay at transit centers

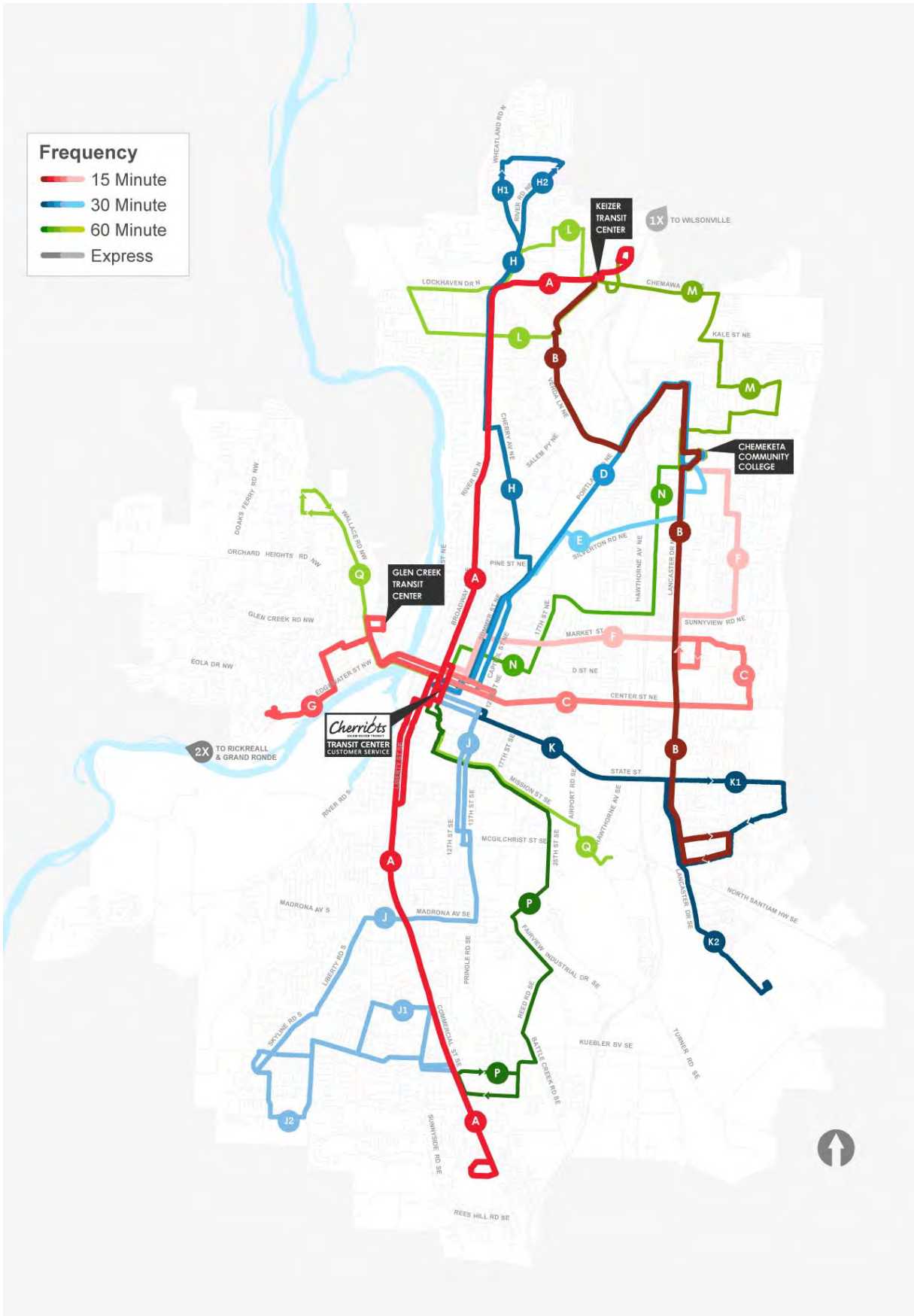
In the current Cherris system, buses spend an average of 32% of the time waiting at a time point or transit center. This is done to help facilitate transfers between low-frequency routes. With this proposal, buses will now only spend 15% of the time waiting, which is more in line with industry standards. For riders, this means less waiting and shorter trips.



Fewer one-way loops

Large, one-way loops offer a lot of coverage and they look good on a map, but they are not all that useful for riders. Most riders will have a short trip going in one direction, but a much longer return trip. This discourages people from riding who are looking for a more direct route. In the proposed system, staff has eliminated almost every large, one-way loop.

Figure 2. Initial Moving Forward service change proposal based on Jarrett Walker & Associates recommendations from the Comprehensive Service Analysis.



6. Public Outreach Process

SAMTD staff engaged in an extensive outreach process from June 2014-February 2015. Outreach was split into two phases. The first round of outreach took place from June-October 2014, and the second round took place from January-February 2015. Both are summarized in Table 1.

Table 1. Moving Forward outreach numbers.

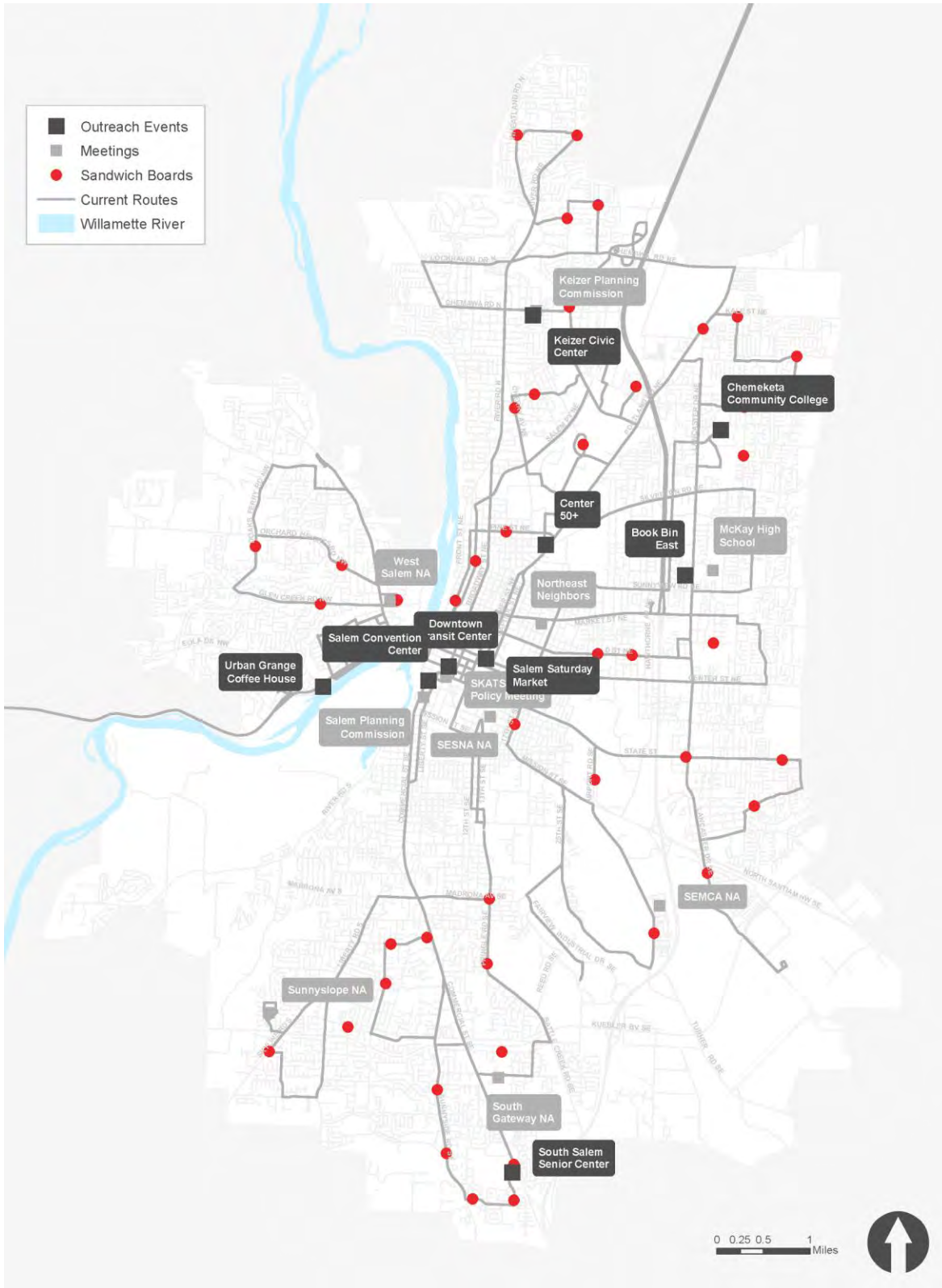
	First Round	Second Round
<i>Dates</i>	June-October 2014	January-February 2015
<i>Events</i>	11	9
<i>Neighborhood Meetings</i>	15	0
<i>Staff</i>	15	9
<i>Staff Hours</i>	203	43
<i>Public Comments</i>	363	160

6.1. First Round

From late July through October 2014, staff presented the initial Moving Forward proposal to riders and other members of the community. The presented materials included a map of current midday frequency and proposed midday frequency, as well as an overview of what the goals of the project were.

Throughout the first round of outreach, staff hosted several open houses, attended many community events, presented at neighborhood meetings, hosted multiple webinars, and staffed booths at the Salem Saturday Market and Chemeketa Community College. Additionally, staff provided information on the Cherriots website, placed fliers on all the buses, set up a self-guided open house in the lobbies of the Downtown Transit Center and Keizer Transit Center, and set up roadside sandwich boards across the city in places where there are suggested route changes. See Figure 3 for locations of all outreach events, meetings attended, and sandwich boards placed in the first round of outreach.

Figure 3. Outreach events, meetings attended, and locations of sandwich boards during first round of outreach.



Based on feedback from riders, community input, and technical reviews, staff made 19 route modifications to the initial proposal.

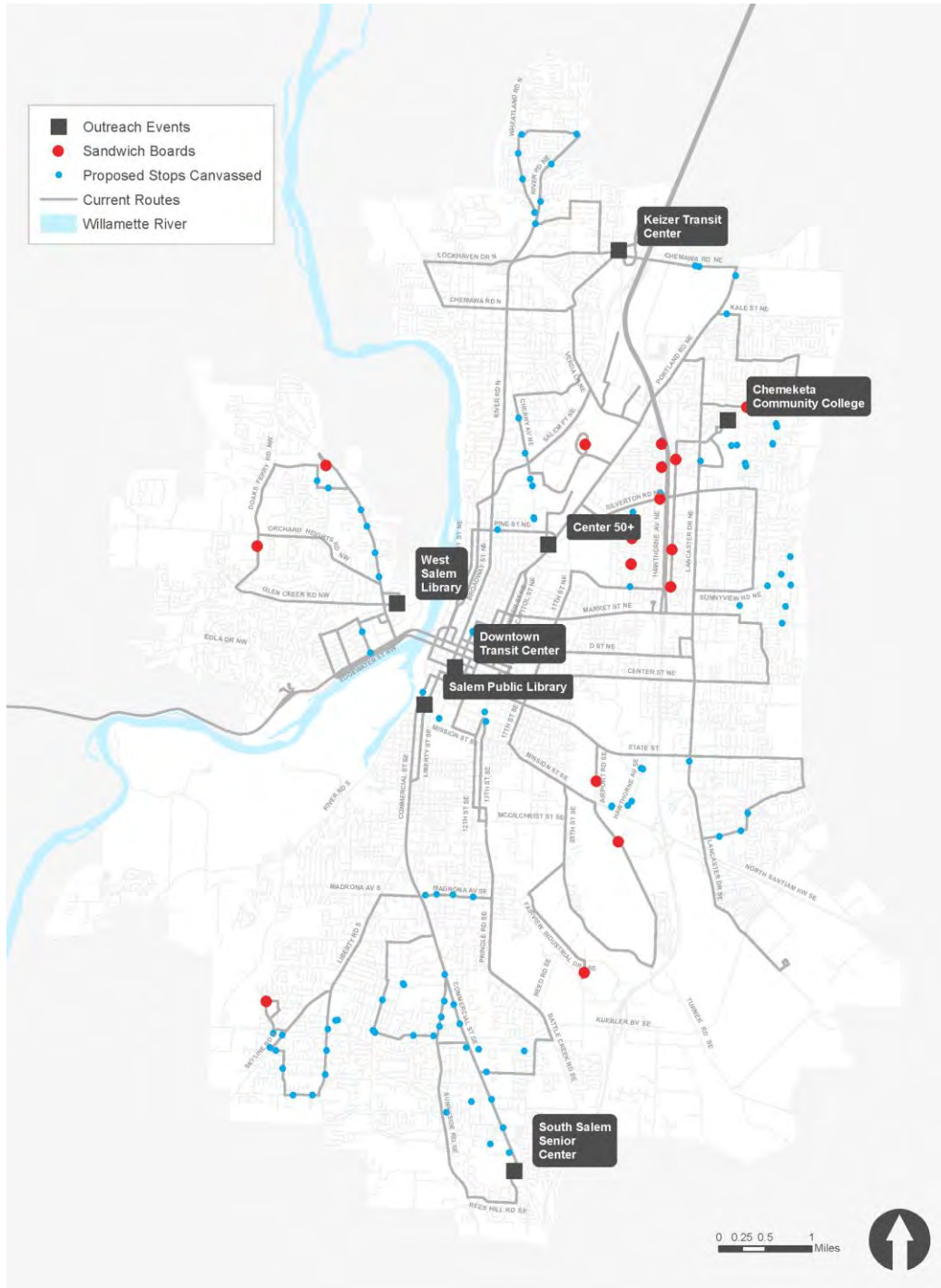
6.2. Second Round

From late January through February 2015 District staff engaged in another round of outreach to get feedback on the modified proposal. This also represented the official public comment period on the service change.

The documents shown to the public were much more detailed during this round of outreach. Materials included maps of individual routes, turn-by-turn walkthroughs, lists of destinations served, lists of proposed stops by route (distinguishing between new stops and current stops), and draft schedules for each route. This 100+ page proposal was made available online and at outreach events. Additionally, individual route profiles were designed and made available to those interested in just a few routes and not the entire proposal.

As well as hosting outreach events, District staff placed sandwich boards informing riders of upcoming changes in places where there had been major revisions between the initial proposal and modified proposal. Also, operators and operation supervisors canvassed houses near proposed new stops to inform residents of how the new service could affect them (see Figure 4).

Figure 4. Outreach events, sandwich board locations, and locations of canvassing in second round of outreach.



There were some small route changes that came out of this second round of outreach, but most modification involved changes to the schedule to better accommodate riders.

7. Moving Forward Phase I Plan

This service change proposal began as a consultant-driven plan based on technical data, and evolved into a community-driven plan based on the needs of Cherriots riders and other Salem and Keizer residents.

Figure 5. Moving Forward service change. Frequency is until 7 p.m. Service lowers from 7-9 p.m.



8. Major Service Change Test

To determine whether individual service changes meet the definition of Major Service Change, current and proposed services are compared. Revenue vehicle hours (the number of hours buses serve riders) and route miles are used to determine changes in service by route; results are shown in Table 2.

Table 2. Major service change test by route. Routes experiencing a Major Service Change are highlighted in purple.

Current Route	Proposed Route	Current Daily Rev. Hrs.	Proposed Daily Rev. Hrs.	Change in Daily Rev. Hrs.	Current Route Miles	Proposed Route Miles	Change in Route Miles	Major Service Change?
Route 3	Route 3	28.38	30.75	+8.3%	12.07	12.07	0%	x
Route 18	Route 14	14.90	15.37	+3.2%	7.30	7.30	0%	x
Route 1X	Route 1X	8.48	8.48	0%	63.80	63.80	0%	x
Route 2X	Route 2X	14.92	14.92	0%	65.17	65.17	0%	x
Route 91	Route 91	0.50	0.50	0%	5.83	5.83	0%	x
Route 92	Route 92	0.83	0.83	0%	9.62	9.62	0%	x
Routes Being Replaced								
Routes 1, 2, 5, 6, 7, 8, 9, 11, 12, 13, 14, 15, 16, 17, 19, 20, 21, 22, 23, 24, 25, 25CX								✓

As seen in Table 2, all routes but six are being replaced, and are therefore experiencing a Major Service Change. Because segments of routes were shuffled and recombined into completely different routes, it is difficult to compare current service to proposed service on a route-by-route basis.

The District's Title VI policies do not prescribe how to analyze a systemwide change. By scaling up the route-level analyses, staff found that all census tracts would be affected by the service change. Therefore, 100% of the minority population would be affected and 100% of the non-minority population would be affected. Additionally, 100% of both the low-income and higher income populations would be affected. Given this analysis, it would be impossible for the District to find a disparate impact or a disproportionate burden.

Although this is the literal interpretation of the District's Title VI program, it was not the intention to create a loophole for systemwide changes. Because of this, District staff decided to perform additional systemwide and stop-level analyses beyond the scope of District's official program in order to ensure the proposed service change is equitable.

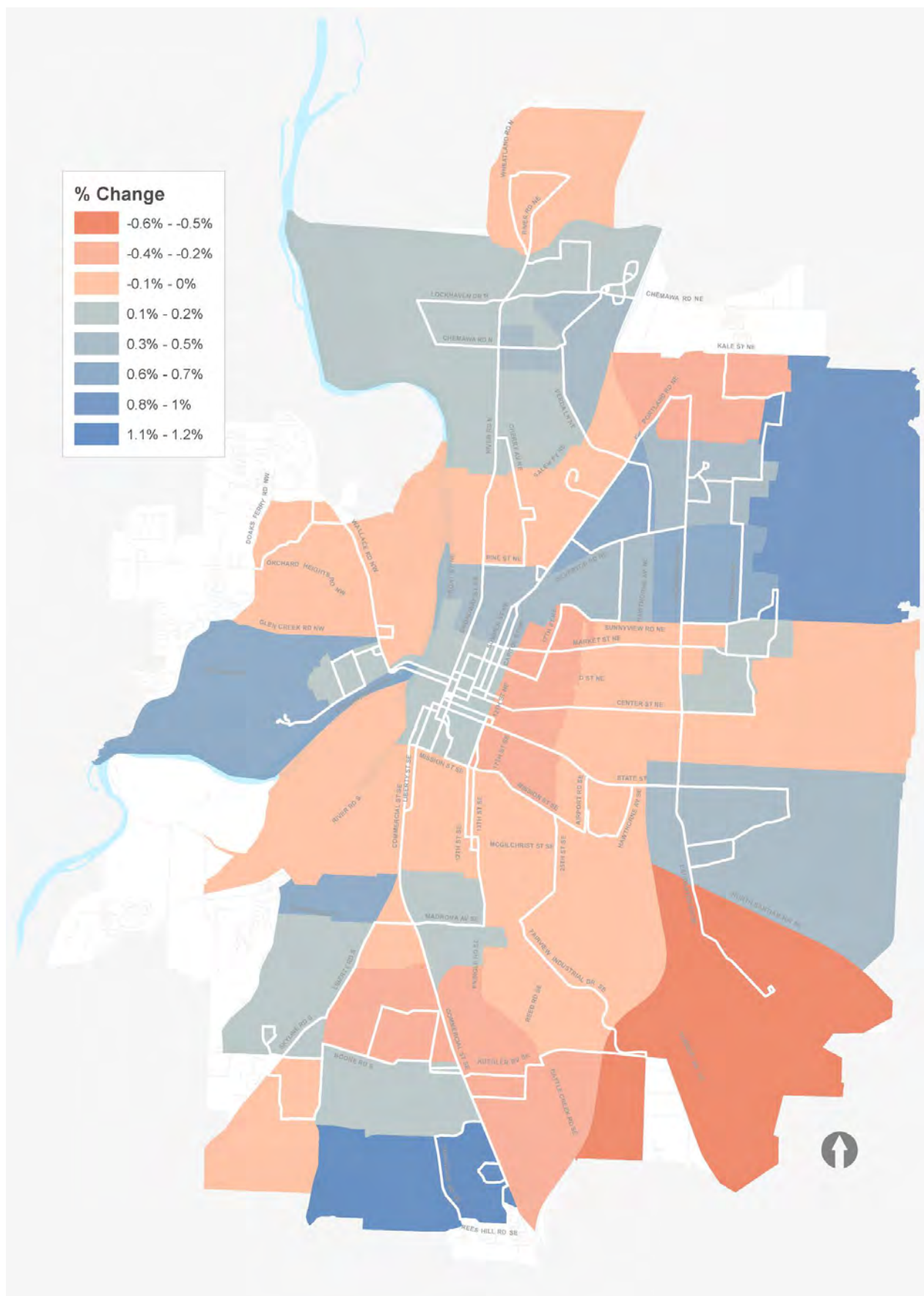
9. System-Level Analysis

In order to analyze the service change at the system level, District staff determined the number of revenue hours by census tract in the current system and compared it to the proposed system (Figure 6).

Revenue hours by census tract were calculated by splitting routes at the census tract boundaries to form route segments, and attributing the revenue hours of those routes to each segment as a proportion of the total route mileage within each census tracts. The number of revenue hours for all segments within each census tract were then totaled, both for the current system and proposed system, and compared.

Census tracts seeing a decrease in service are colored red, and census tracts with increased service are colored blue. A disparate impact analysis and disproportionate analysis were completed for both the census tracts with decreased service and the census tracts with increased service.

Figure 6. Changes in revenue hours by census tract.



9.1. Disparate Impact Analysis

The system-level Disparate Impact analysis was completed by determining what proportion of the District’s minority population is positively or negatively impacted by the Major Service Changes, and comparing that to the District’s non-minority population that is positively or negatively impacted. There are two separate analyses completed: the first looks at census tracts with decreased service and the second looks at census tracts with increased service.

9.1.1. Increased Service

There would also be a potential Disparate Impact if the share of the minority population impacted by the increased service was less than 80% of the share of the non-minority population impacted by the increased service. In this case, since 54.4% of the non-minority population is impacted by the service change, a Disparate Impact would exist if the share of the minority population impacted was less than 43.5%. The share of the minority population impacted is 59.5% (Figure 8, Table 4). As a result, no system-level Disparate Impact is found for the increased service.

9.1.2. Decreased Service

A potential Disparate Impact would exist if the share of the minority population impacted by the decreased service was more than 20% of the share of the non-minority population impacted by the decreased service. In this case, since 45.6% of the non-minority population is impacted by the service change, a Disparate Impact would exist if the share of the minority population impacted was greater than 55.0%. The share of the minority population impacted is 40.5% (Figure 7, Table 4). As a result, no system-level Disparate Impact is found for the decreased service.

Figure 7. Disparate Impact test for decreased service.

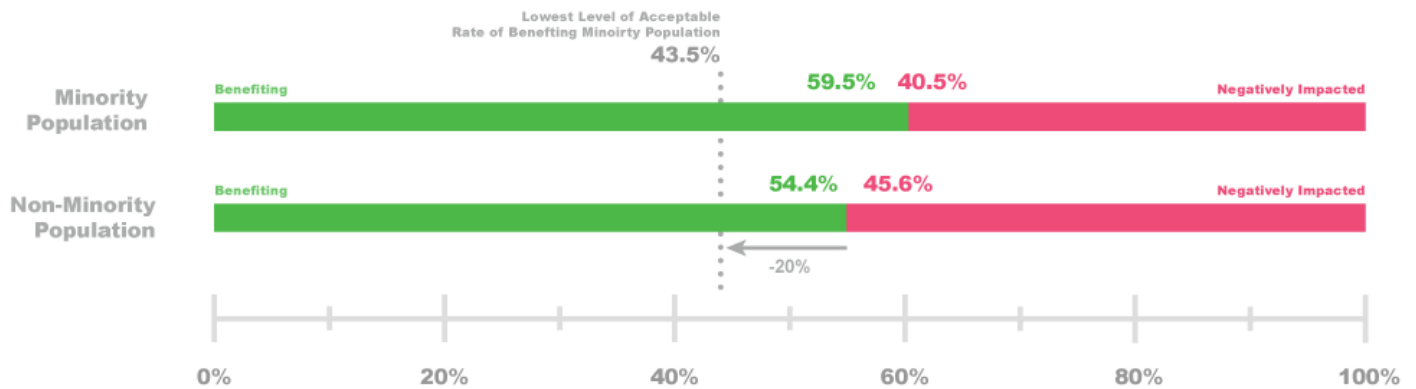


Table 4. Impacts of the Major Service Change on minority populations.

	Decreased Service			Increased Service		
	Impacted	Total	% Impacted	Impacted	Total	% Impacted
Minority Population	28,697	70,854	40.5%	42,157	70,854	59.5%
Non-Minority Population	68,432	150,096	45.6%	81,664	150,096	54.4%

(Source: 2013 American Community Survey 5-year estimate)

9.2. Disproportionate Burden Analysis

The system-level Disproportionate Burden analysis was completed by determining what proportion of the District’s low-income population is positively or negatively impacted by the Major Service Change, and comparing that to the District’s higher income population that is positively or negatively impacted. “Higher income” includes all persons above the low-income threshold of 100% federal poverty. There are two separate analyses completed: the first looks at census tracts with decreased service and the second looks at census tracts with increased service.

9.2.1. Increased Service

There would also be a potential Disproportionate Burden if the share of the low-income population impacted by the increased service was less than 65% of the overall share of the higher income population impacted by the increased service. In this case, since 56.5% of the higher income population is impacted by the service change, a Disproportionate Burden would exist if the share of the minority population impacted was less than 36.7%. The share of the minority population impacted is 59.2% (Figure 10, Table 5). As a result, no system-level Disproportionate Burden is found for the increased service.

9.2.2. Decreased Service

A potential Disproportionate Burden would exist if the share of the low-income population impacted by the decreased service was more than 35% of the share of the non-minority population impacted by the decreased service. In this case, since 43.5% of the higher income population is impacted by the service change, a Disparate Impact would exist if the share of the low-income population impacted was greater than 58.7%. The share of the low-income population impacted is 40.8% (Figure 9, Table 5). As a result, no system-level Disproportionate Burden is found for the decreased service.

Figure 8. Disproportionate burden test for decreased service.

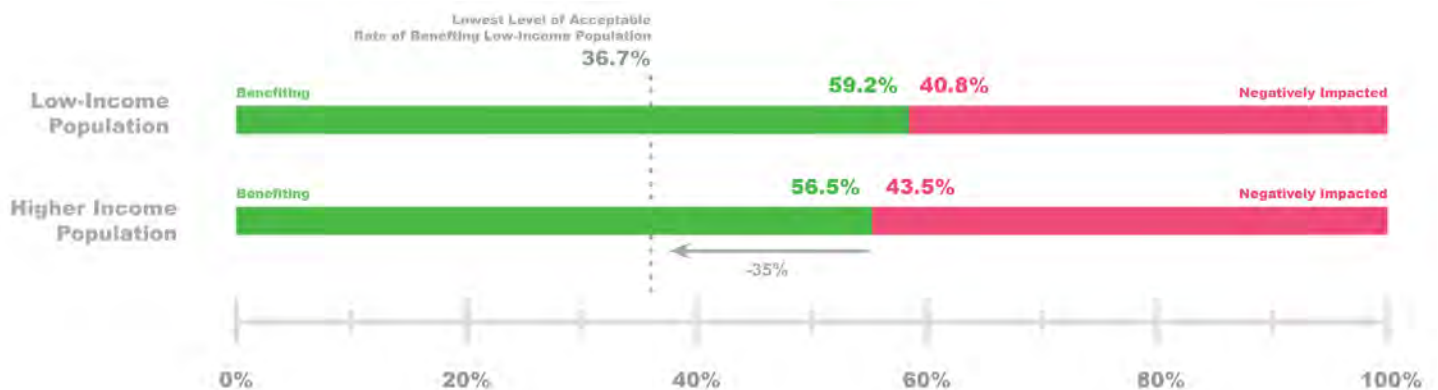


Table 5. Impacts of the Major Service Change on low-income populations.

	Decreased Service			Increased Service		
	Impacted	Total	% Impacted	Impacted	Total	% Impacted
Low-Income Population	16,278	39,887	40.8%	23,609	39,887	59.2%
Higher Income Population	75,415	173,327	43.5%	97,912	173,327	56.5%

(Source: 2013 American Community Survey 5-year estimate)

10.1. Removed Service

Overall 179 stops will be removed as a result of the Major Service Change (Figure 12).

Figure 12. Removed stops with Adverse Effects and potential Disparate Impacts or Disproportionate Burdens.

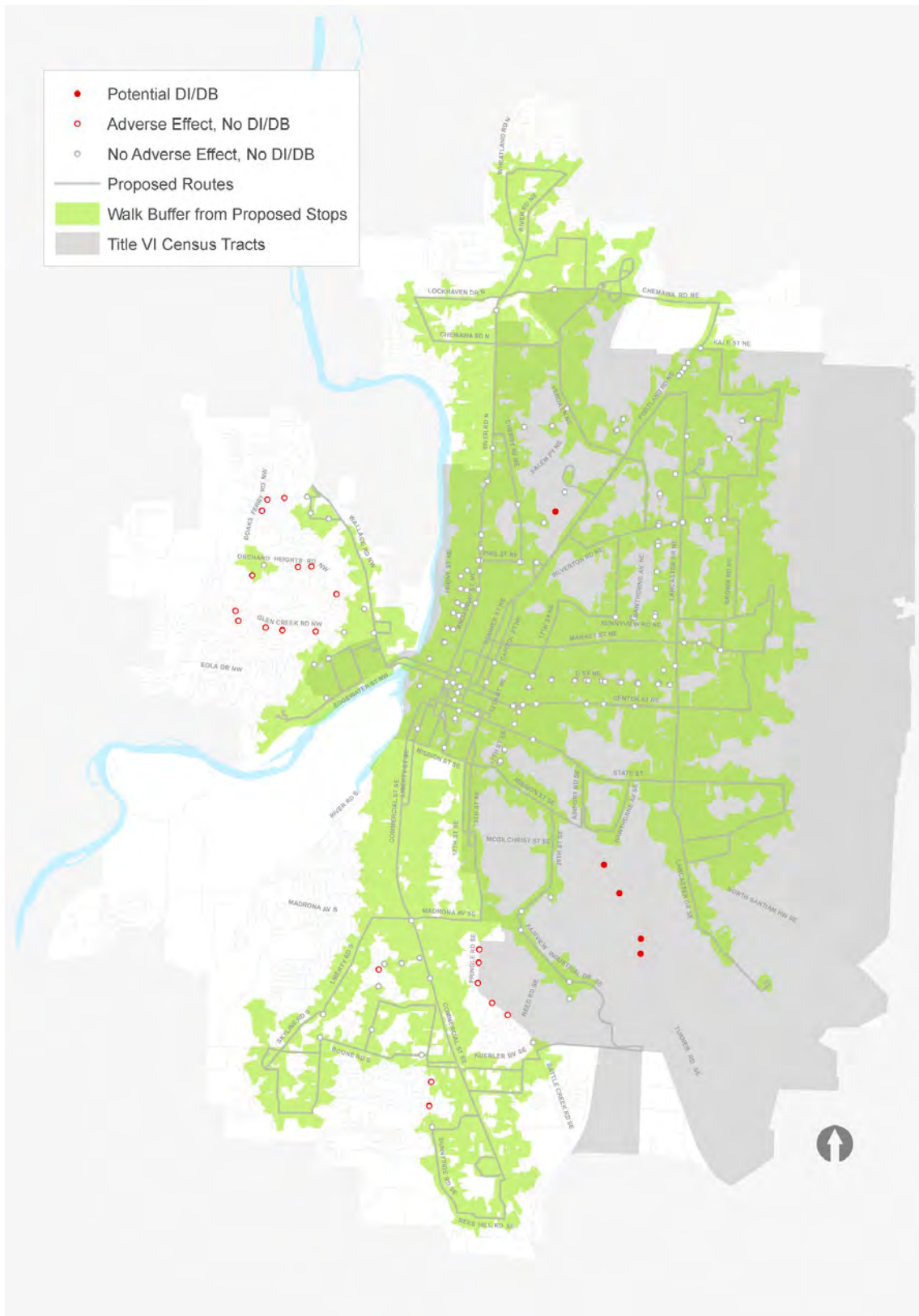


Table 6 highlights segments where the removal of stops will result in an Adverse Effect. By SAMTD’s policy definition, stops with an Adverse Effect are removed stops that are further than 1/4 mile from alternative regular service. Stops were also considered to not have an Adverse Effect if they were within 1/2 mile from frequent service (15-minute service during the peak), as was the basis of Jarrett Walker & Associate’s Comprehensive Service Analysis and system change recommendations. Stops with a potential Disparate Impact (stops with an Adverse Effect in a census tract with a higher-than-regional-average minority population) or Disproportionate Burden (stops with an Adverse Effect in a census tract with a higher-than-regional-average low-income population) are grouped into segments, highlighted in red, and examined below. For each segment, staff indicates whether they chose to avoid, minimize, mitigate, or explain potential disparate impacts and disproportionate burdens.

Table 6. Removed stops with an Adverse Effect by segment.

Segments	Route(s)	Adverse Effect	% Min	Potential Disparate Impact	% Pov	Potential Disp. Burden
<i>Brush College & Orchard Heights Loops</i>	22, 23	✓	21.9	x	10.8	x
<i>Rees Hill Loop</i>	21	✓	19.8	x	10.6	x
<i>Pringle Road</i>	6	✓	16.4	x	8.9	x
<i>Salem Industrial Boulevard</i>	14	✓	53.3	✓	32.7	✓
<i>Turner Road</i>	7	✓	34.2	✓	29.7	✓

(Source: 2013 American Community Survey 5-year estimate)

10.1.1. Salem Industrial Boulevard

This stop is slightly more than a quarter of a mile away from regular service (0.45 mi).

According to the CSA’s ride check, this stop has an average of 0 boardings and alightings per day.

10.1.2. Turner Road

Turner Road is a challenge to serve. There is very little development, and it is difficult to turn a bus around. Currently buses serve this route by creating a large, one-way loop on Airport Way. However, one of the goals of Moving Forward is to reduce one-way loops. In the current proposal, there are four stops along Turner Road that will be removed (Table 7).

Avoid **Minimize** **Mitigate** **Explain**

Table 7. Removed stops on Turner Road

Removed Stops	Ons / Offs	Distance from Planned Stop
Turner Road @ Walmart	15 / 16	0.4 mi
Garmin	0 / 1	0.8 mi
Paradise Island	0 / 1	1.3 mi
Lakeside Village	5 / 5	1.5 mi

(Source: Comprehensive System Analysis Existing Conditions Report)

District staff have looked into options for turning the bus around on Turner Road. Staff presented at the Southeast Mill Creek Neighborhood Association (SEMCA) and worked with the owner of the Paradise Island neighborhood to turn the bus around on their streets, but the neighborhood ultimately decided not to support this.

The only other reasonable option for turning the bus around was in the Walmart parking lot, which does not alleviate the lack of service for residents of Lakeside Village and Paradise Island. Additionally, because of extra time in the route, the bus would end up sitting at Walmart for up to 20 minutes every hour.

During the proposal review, Staff was looking into restoring 30-minute service to the Pennsylvania loop due to equity concerns. The plan at the time was to reduce frequency in the loop from 30 minutes to 60 minutes, which would lead to a reduction in service for 140 daily riders.

Staff decided the resources were better spent restoring the 30-minute service in that loop instead of directly serving the Walmart on Turner Road. Cherriots will serve the two other Walmarts in the community with 15-minute service.

Staff is in the process of working with a consultant to create a system redesign of CARTS, Salem-Keizer Transit's rural service. CARTS 30 currently stops at the Walmart on Turner Road. As part of the service redesign, staff will look into serving Paradise Island with CARTS 30 as well.

Any stop with a reduction in service is considered to have an Adverse Effect. If stops with Adverse Effects fall in census tracts with higher-than-regional-average minority populations, the stops will be considered to have a potential Disparate Impact. If the same conditions apply, only in a census tract with higher-than-regional-average low-income population, the stops will be considered to have a potential Disproportionate Burden. Stops with a potential Disparate Impact and/or Disproportionate Burden are grouped into segments and highlighted in orange in Table 8.

Table 8. Stops with reduced service with an Adverse Effect by segment.

Segments	Current Route(s)	% Decrease	Adverse Effect	% Min	Potential Disparate Impact	% Pov	Potential Disp. Burden
<i>Parkmeadow Loop</i>	9	48	✓	12.5	x	9.5	x
<i>Keizer Station</i>	11, 19	74	✓	18.6	x	16.9	x
<i>Chemawa Road</i>	11	74	✓	26.6	x	16.3	x
<i>Hayesville</i>	15	49	✓	36.3	✓	18.3	x
<i>Winema Place</i>	11	48	✓	59.3	✓	36.6	✓
<i>N. Lancaster Drive</i>	11, 15	30	✓	49.8	✓	30.8	✓
<i>Portland Road</i>	3, 14, 15	49	✓	49.4	✓	35.3	✓
<i>17th, D, Sunnyview</i>	2, 20	29	✓	35.4	✓	28.0	✓
<i>Market Street</i>	17	39	✓	56.9	✓	27.0	✓
<i>Airport Park & Ride</i>	16	51	✓	34.3	✓	29.7	✓
<i>25th & Fairview Ind.</i>	7	30	✓	34.3	✓	29.7	✓
<i>S. Lancaster Drive</i>	11	66	✓	28.8	x	21.9	✓
<i>Downtown Salem</i>	4, 5, 6	51	✓	29.2	x	21.0	✓
<i>Baxter Road</i>	6	36	✓	16.5	x	8.8	x
<i>Route 21 Loops</i>	21	63	✓	19.3	x	9.5	x
<i>Route 8 Southern End</i>	8	32	✓	16.9	x	10.6	x
<i>South Commercial</i>	1, 8, 21	27	✓	17.5	x	11.9	x

(Source: 2013 American Community Survey 5-year estimate)

On the following pages, segments with potential disparate impacts or potential disproportionate burdens are discussed. Each section indicates whether District staff chose to avoid, minimize, mitigate, or explain potential disparate impacts and disproportionate burdens.

10.2.1. Hayesville

Ridership is relatively low in the Hayesville neighborhood. As a result, service was reduced from 30-minute to 60-minute frequency, which represents a 49% decrease in frequency.

Avoid **Minimize** **Mitigate** **Explain**

The largest trip generator in this neighborhood is Stephens Middle School. During the second round of outreach, District staff were approached by concerns teachers and parents that the new schedule would not work well for their students. Staff were able to mitigate the issue by moving the pulse out of Keizer Transit Center from the top of the hour to 30 minutes after the hour. Since there is no other 60-minute service pulsing out of Keizer Transit Center, this had no effect on transfers while allowing students to and from school at the same times as today.

10.2.2. Winema Place

The current Route 11 creates a one-way loop on Winema Place every 15 minutes to serve Early College High School. However, ridership is low. In the proposed plan, the stops in the Winema Place loop will be served by Route 13 every 30 minutes, which connects to the Downtown Transit Center. The total service reduction is 48%.

Avoid **Minimize** **Mitigate** **Explain**

The ridership at this stop does not merit 15-minute service. Both stops seeing a reduction in service are less than a half mile from 15-minute service (0.10 and 0.27 miles). Overall, minority and low-income populations are benefiting from the changes to the services because of the reduction of service to stops with lower ridership like these ones.

10.2.3. North Lancaster Drive

Staff decided to reroute proposed Route 12 (currently served by Route 15) to add more coverage to the Hayesville neighborhood.

Avoid **Minimize** **Mitigate** **Explain**

Originally the plan was to run the service on Lancaster Drive. However, Route 11 already serves Lancaster Drive every 15-minutes, using Lancaster Drive for Route 12 would be duplicative. By rerouting Route 12 to enter Chemeketa Community College from the back instead of the front, staff was able to add more coverage without reducing meaningful frequency on Lancaster Drive. For the stops with reduced service, there was a 30% reduction. However, Lancaster Drive will still maintain scheduled 15-minute service, as is the case today.

10.2.4. Portland Road

There is one stop on Portland Road seeing a 49% reduction in service as a result of the rerouting of Route 11.

Avoid **Minimize** **Mitigate** **Explain**

This is just a few blocks from the rerouted Route 11, which will provide 15-minute service.

10.2.5. 17th, D, Sunnyview

Stops along 17th St., D St., and Sunnyview Rd. are seeing a reduction of service from 30-minute to 60-minute in the AM and PM peaks, which is resulting in a 29% decrease in service. This is a result of making service consistent throughout the day.

Avoid **Minimize** **Mitigate** **Explain**

Ridership on these streets did not merit 30-minute service all day. Overall, minority and low-income populations are benefiting from the changes to the services because of the reduction of service to stops with lower ridership like these ones.

10.2.6. Market Street

Ridership for two stops on Market St. is being reduced by 39%. Frequency is being reduced from 15-minute to 30-minute in the AM, midday, and PM, and from 30-minute to 60-minute in the evening. The reduction is a result of a service split at the end of the proposed Routes 5/5A to add coverage service for Cesar Chavez Elementary.

Avoid **Minimize** **Mitigate** **Explain**

The two stops with reduced service are very close to other 15-minute service (0.08 mi and 0.26 miles), which is within the District's policy of providing service within a half mile from frequent service. Overall, minority and low-income populations are benefiting from the changes to the services because of the reduction of service to stops with lower ridership like these ones.

10.2.7. Airport Park & Ride

The Airport Park & Ride stop has very low ridership. Currently the stop is served with 30-minute service by Route 16. In the initial service change proposal, the stop was not going to be served.

Avoid **Minimize** **Mitigate** **Explain**

In order to respond to requests for continued service, District staff restored service using proposed Route 4 with 60-minute service, resulting in a 51% decrease in service from today. Staff looked into using Route 4A to service the stop as well in order to maintain 30-minute service, but there is not enough time in the schedule.

10.2.8. 25th & Fairview Industrial

Stops along 25th St. and Fairview Industrial Blvd. are seeing a reduction of service from 30-minute to 60-minute in the AM and PM peaks, resulting in a 30% reduction. This is a product of making service consistent throughout the day.

Avoid **Minimize** **Mitigate** **Explain**

Ridership on these streets did not merit 30-minute service all day. Overall, minority and low-income populations are benefiting from the changes to the services because of the reduction of service to stops with lower ridership like these ones.

10.2.9. South Lancaster Drive

Service for the stops along Lancaster Drive south of Rickey St. is being reduced from 15-minute frequency to 60-minute frequency, resulting in a 66% reduction. Currently Route 11 serves this segment every 15 minute. In the proposed service, the lower-frequency Route 4A will service this segment.

Avoid **Minimize** **Mitigate** **Explain**

Ridership along this corridor to not merit 15-minute service. The only other route that ran near this corridor was a 60-minute route. The option of having 30-minute service would have required to removal of service on the Pennsylvania loop, reducing service from 30 to 60 minutes in a loop with higher ridership. Since both are in Title VI census tracts, District staff decided providing 60-minute service along this corridor using Route 4A was the most equitable option. Overall, minority and low-income populations are benefiting from the changes to the services because of the reduction of service to stops with lower ridership like these ones.

10.2.10. Downtown Salem

There have been small changes to frequency at stops in Downtown Salem. This is the result of the rerouting of buses due to the service change. Because of this, the stops with reduced frequency have seen an average of a 51% drop in service.

Avoid **Minimize** **Mitigate** **Explain**

There is no way to maintain service at these stops without substantially modifying the entire plan, or creating large one-way loops downtown, which would make service worse for most riders. Overall, minority and low-income populations are benefiting from the changes to the services because of the reduction of service to stops with lower ridership like these ones.

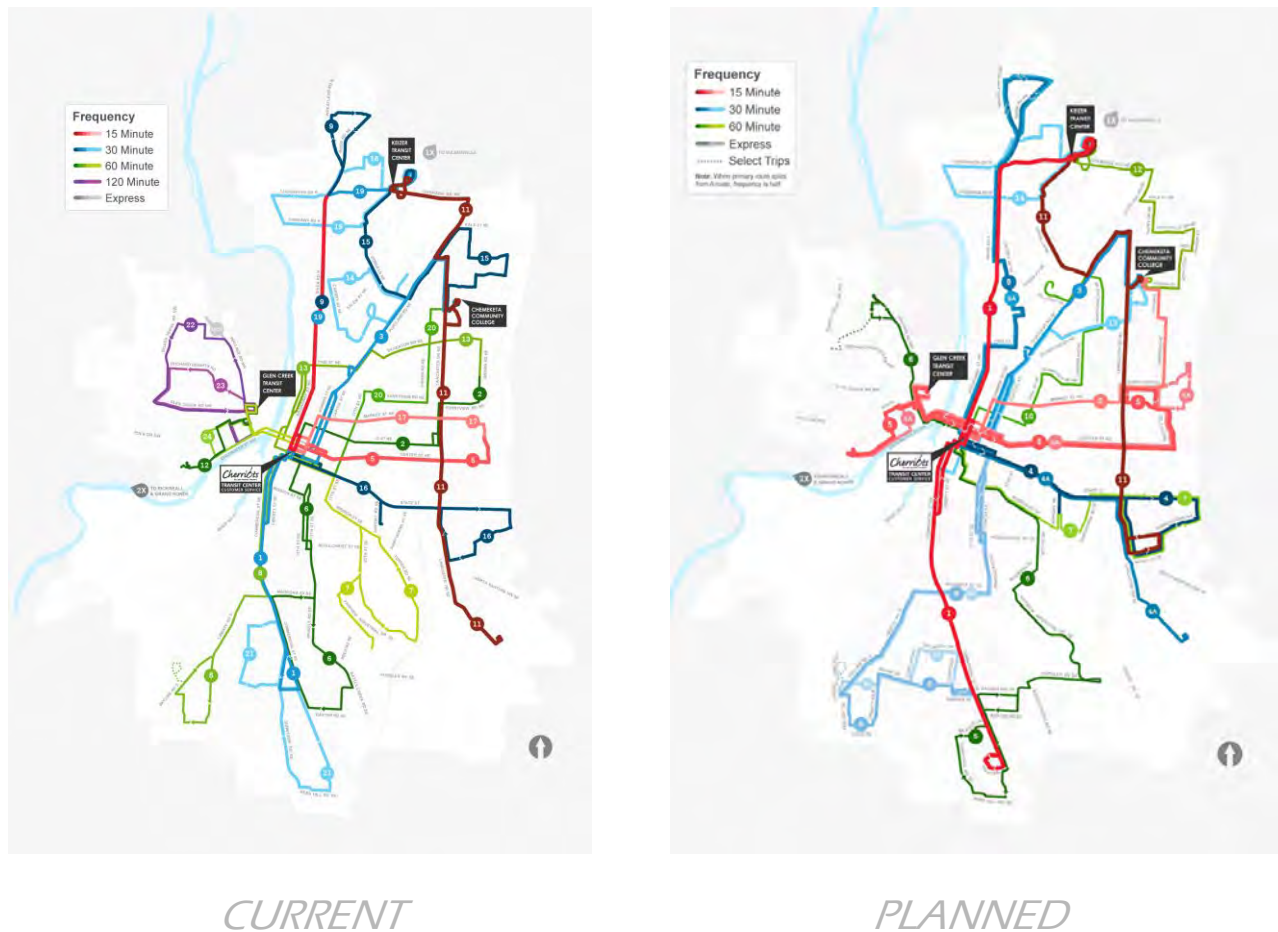
11. Summary and Discussion

Not every rider will benefit from these Major Service Changes. However, on the whole this service will work better for more people than the current system. These benefits can be realized without disparately impacting minority populations and without disproportionately burdening low-income populations on the whole in the SAMTD service area.

Although there are some stops where service has been decreased, this service change has the potential to be more beneficial to minority populations as compared to non-minority populations and low-income population compared to higher-income populations. This context, as well as the processes undertaken that led to this proposal, provide a “substantial legitimate justification” for the District to move forward with the service change proposal as planned, despite potential Disparate Impacts and Disproportionate Burdens at the stop level.

Thus, given the available data and established methodology, implementing these changes appears to benefit protected populations equitably. The District therefore finds no Disparate Impact or Disproportionate Burden associated with the Moving Forward Phase I service change.

Figure 14. Changes between midday routes and frequency from current service to planned service.



**MOVING»
FORWARD**

Cherriots Regional Title VI Equity Analysis

April 27, 2017

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1. Background

Salem Area Mass Transit District (SAMTD) currently operates Cherriots local fixed-route buses and Cherriots 1X and 2X regional express routes. Additionally, SAMTD operates the CARTS regional system, which is funded entirely by one state grant, two federal grants, and passenger fares. The three grants are: Oregon's Special Transportation Fund (for seniors, people with disabilities and low-income individuals), the federal Section 5310 (Enhanced Mobility of Seniors and Individuals with Disabilities) and federal Section 5311 (Formula Grants for Rural Areas) programs. CARTS currently has eight demand-responsive services. CARTS Routes 10, 20, 30, 40, and 50 are deviated-fixed routes. CARTS 25 and 45 are flex routes, and CARTS 35 is a dial-a-ride zone.

In July 2015, SAMTD hired Jarrett Walker and Associates (JWA) to evaluate the CARTS network. JWA completed the Regional Transit Plan in February 2016. The proposal includes removing most of the demand-responsive service currently operating and replace it with regional express routes, much like the 1X and 2X that SAMTD already operates. SAMTD staff then took JWA's recommendations and developed draft maps and schedules, which were presented to the public in September and October 2016. Outreach included staff attending 12 events, riding the CARTS buses, and conducting online and social media outreach. Based on feedback from riders and the community, SAMTD modified the proposal and presented it to the Cherriots Board of Directors on January 26, 2017 for approval.

As part of this service redesign effort, SAMTD is also rebranding its services. The CARTS routes, as well as Cherriots Routes 1X and 2X, will all fall under the new Cherriots Regional brand.

2. Equity Analysis

As a recipient of Federal financial assistance, SAMTD must ensure that service changes – both increases and reductions – comply with Title VI 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 FTA has provided specific implementing guidelines and regulations for complying with Title VI in Circular 4702.1B (“Circular”). Due to the interrelated nature of race/ethnicity and income, the Circular instructs transit agencies to consider impacts on low-income populations as well as minority populations; the assessment of potential Title VI issues related to service changes is completed through a service equity analysis.

3. SAMTD Title VI Compliance

In the spring of 2014, SAMTD updated its Title VI program. The program outlines agency policies, definitions, and procedures for complying with Title VI and performing equity analyses. This includes the agency’s Major Service Change, Adverse Effects, Disparate Impact, and Disproportionate Burden policies.

3.1. Major Service Change Policy

All changes in service meeting the definition of Major Service Change are subject to a Title VI Equity Analysis. A Major Service Change is defined as:

1. Either a reduction or an expansion in service of:
 - a. 25 percent or more of the number of transit route miles, or;

- b. 25 percent or more of the number of transit vehicle revenue hours, computed on a daily basis for the day of the week on which the change is made, or;
2. A new transit route is established.
3. If changes in service on a route to be effective at more than one date within any fiscal year would equal or exceed 1(a) and/or 1(b) above, the changes in total will be considered a Major Service Change, and a Disparate Impact Analysis will be completed in advance of action on the proposed change.

3.2. Adverse Effects Definition

Adverse effects of Major Service Changes are defined as a decrease in the level of transit service (span in days and/or hours, and/or frequency) and/or decreased access to transit service defined as an increase of the access distance to beyond one-quarter mile of bus stops served by less than 4 buses per hour in peak service periods or one-half mile for bus stops served by 4 or more buses per hour in peak service periods.

3.3. Disparate Impact Policy

Testing for Disparate Impact evaluates effects on minority riders or populations as compared to non-minority riders or populations. "Minority" is defined as all persons who identify as being part of a racial/ethnic group besides white, non-Hispanic.

3.3.1. Disparate Impact Definition

1. A Major Service Change to a route will be considered to have a disparate impact if condition a, b, and either condition c or d below is found to be true:
 - a. The percentage of impacted minority population in the service area of the route exceeds the percentage of minority population of the SAMTD District as a whole, and;
 - b. If the percentage of impacted minority population differs from the percentage of impacted non-minority population by more than 20 percent, the overall impact of changes will be considered disparate.

- c. In the event of service reductions, the service change has an adverse effect on the minority population in the service area of the route.
- d. In the event of service additions, the addition is linked to other service changes that have adverse effects on the minority population in the service area of the route, or; the service addition on the subject route is linked with a service change(s) on other route(s) that have adverse effects on the minority population in the service area of that route or routes.

3.4. Disproportionate Burden Policy

Testing for a Disproportionate Burden evaluates potential effects on low-income riders or populations, defined as riders or populations at or below 100% of the federal poverty level.

3.4.1. Disproportionate Burden Definition*

1. A Major Service Change to a route will be considered to have a disproportional burden if condition a, b, and either condition c or d below is found to be true:
 - a. The percentage of impacted low-income population in the service area of the route exceeds the percentage of low-income population of the SAMTD District as a whole, and;
 - b. If the percentage of impacted low-income population differs from the percentage of impacted non-low income population by more than 35 percent, the overall impact of changes will be considered disproportional.
 - c. In the event of service reductions, the service change has an adverse effect on the low-income population in the service area of the route.
 - d. In the event of service additions, the addition is linked to other service changes that have adverse effects on the low-income population in the service area of the route, or; the service addition on the subject route is linked with a service change(s) on other route(s) that have adverse

effects on the low-income population in the service area of that route or routes.

pick them up at their homes if they live near the route. Although these trip requests are helpful for people who cannot or do not want to walk to a bus stop, they make the bus schedule unreliable for other riders.

5. Regional Transit Planning Project

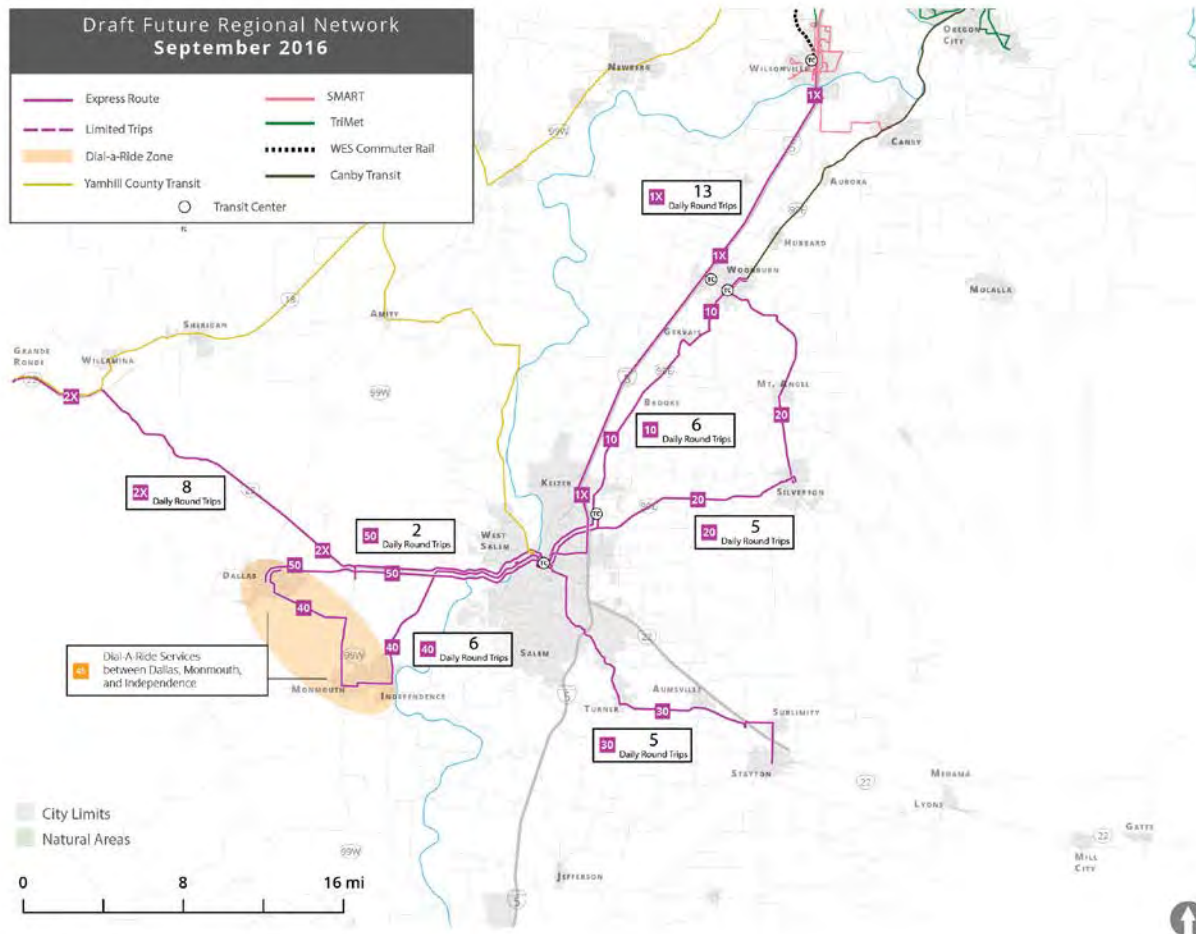
Jarrett Walker and Associates (JWA) was hired in July 2015 to perform the Regional Transit Planning Project, which included an analysis of CARTS, 1X, and 2X existing services, and a recommendation for changes to some or all of the services.

The purpose of the project was to increase ridership, maximize efficiency, and improve the usefulness of public transportation services throughout Marion and Polk Counties. JWA's final report recommended significant service changes that would address the desires of project stakeholders and the public, and optimize the regional network in two future scenarios: one with a cost-neutral approach, and one that would only be possible with twenty-five percent greater funding.

Numerous public meetings occurred where the findings of the existing conditions reports were presented and stakeholders were polled about how they envision the transit system for the future. Following the stakeholder workshop held in Keizer, JWA and staff held meetings with various city staff and elected officials in November and December 2015 and a map with recommendations was presented.

6. Initial Staff Plan

Below are the service changes proposed to the public in September and October 2016. With the exception of CARTS 45 Polk County Flex (dial-a-ride), the proposal had all demand-responsive service replaced with commuter express routes.



The initial draft plan was released to the public on cherriots.org on Sept. 1, 2016. In order to get the word out about the proposal, staff completed six weeks of public outreach for the draft plan in September and October of 2016, which included attending 12 events (most held in the outlying cities of Marion and Polk Counties), riding the CARTS buses, and conducting online and social media outreach. As shown in Table 1 below, staff made about 1,650 public contacts and received more than 375 written comments during that time.

Table 1: Public Contacts and Written Comments Received During Outreach

Date	Event Location	Number of Contacts Made	Number of Written Comments Collected
9/10	Saturday Markets in Aumsville, Dallas, Independence	60	16
9/10	Woodburn Fiesta de Salud (Spanish)	60	5
9/14	Canyon Collaborative meeting	15	9
9/20	Elected officials meeting, Stayton	24	7
9/24	Silverton Community Aid Resource Day	31	20
9/26	Chemeketa Community College	51	19
9/26	KWIP Radio Show (Spanish)	100 [†]	1
9/27	Woodburn Bi-Mart table	32	19
9/29	Table at CARTS bays (Downtown Transit Center)	92	63
10/13	Mill City Arts Center and Radio Show (KYAC)	60	20
9/12 - 10/20	Onboard Buses (Routes 10, 20, 30, 40 and 50)	81	75
9/7 - 10/20	Online (email, English and Spanish Facebook posts, Twitter)	1,032	79
9/7 - 10/20	Hard copy letters	17	17
9/7 - 10/20	Miscellaneous	14	27
	Totals	1,669*	376

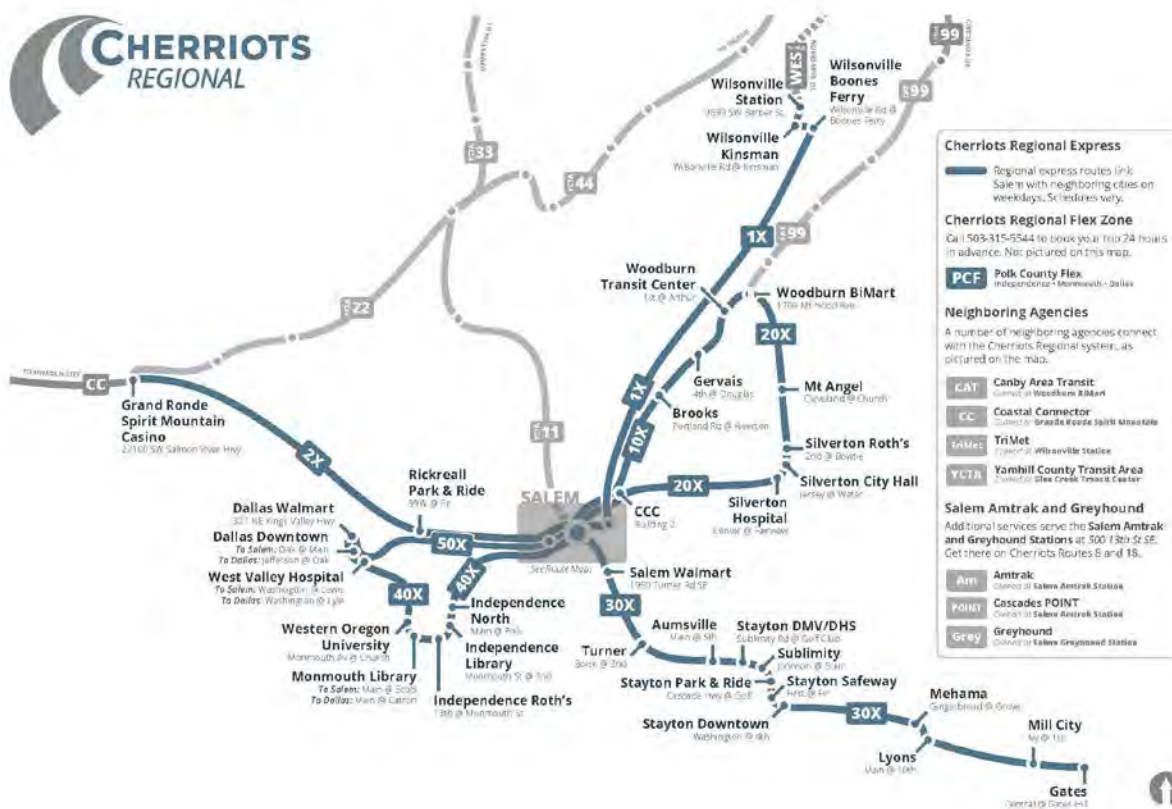
*Total unique contacts (some people could have been included via multiple avenues and an attempt was made to exclude duplicates in this count)

[†]Estimate based on listener-base during radio shows

Two unique aspects of this outreach were the geographic diversity it represented and the effort to reach both current riders and potential future riders. The events were advertised via social media, event-specific websites, cherriots.org and announcements on the CARTS buses.

7. Revised Staff Plan

Since the conclusion of the initial outreach, Planning staff have revised the proposed schedules, routing and stops for each route to respond to feedback. The revised plan addressed public concerns by modifying trip times and restoring service between Stayon and Gates in the east Santiam Canyon.



The revised plan was presented to and approved by the Cherriots Board of Directors at the January 26, 2017 Board meeting.

8. Analysis

8.1 Major Service Change Test

The current SAMTD Title VI program requires an equity analysis when there is a Major Service Change, which the program defines as “25 percent or more of the number of transit route miles, or; 25 percent or more of the number of transit vehicle revenue hours, computed on a daily basis for the day of the week on which the change is made, or; A new transit route is established.”

Neither FTA Circular 4702.1B nor our program anticipate the idea of a demand-responsive service being converted into a fixed-route service. This means the discontinuations of CARTS 10, 20, 25, 30, 35, 40, and 50 do not need to be evaluated since they are all demand-responsive services. The new Routes 10X, 20X, 30X, 40X, and 50X are all newly established fixed routes.

The establishment of each of these routes qualifies as a “Major Service Change.”

8.2 Disparate Impact Analysis

In the case of service additions, the SAMTD Title VI Program would only find a disparate impact if “the addition is linked to other service changes that have adverse effects on the minority population in the service area of the route, or; the service addition on the subject route is linked with a service change(s) on other route(s) that have adverse effects on the minority population in the service area of that route or routes.”

The revenue hours and revenue miles on these new routes come at no expense to any other fixed-route service. Therefore, there are no adverse effects, and as a result no potential disparate impact on minority populations from the creation of the new routes.

8.3 Disproportionate Burden Analysis

SAMTD has a similar policy for conducting the disproportionate burden analysis. In the case of service additions, the SAMTD Title VI program would only find a disparate impact if "the addition is linked to other service changes that have adverse effects on the low-income population in the service area of the route, or; the service addition on the subject route is linked with a service change(s) on other route(s) that have adverse effects on the low-income population in the service area of that route or routes."

As stated before, the revenue hours and revenue miles on these new routes come at no expense to any other fixed-route service. Therefore, there are no adverse effects, and as a result no potential disproportionate burden on low-income populations from the creation of the new routes.

8.4 Public Hearing

SAMTD has no requirement for a public hearing in the case of service increases, which this service change is.

9. Summary and Discussion

Given the available data and established methodology, implementing the changes to the current regional network appears to benefit protected populations equitably. The District therefore finds no Disparate Impact or Disproportionate Burden associated with the Cherrlots Regional service change.

Jan. 2015 Fare Change Public Engagement and Title VI Equity Analysis

Fares were changed on January 5, 2015, after approval by the Board of Directors at the October 23, 2014 Board meeting. As stated in the Board meeting documentation, there were many efforts to engage the public in the process including public events and involvement of the District's Citizen's Advisory Committee in the determination of every fare.

A Title VI Equity Analysis was not completed for this fare change because the District had not surveyed the riders prior to initiating the fare change process. A survey is necessary in order to obtain information based on race and income level about how our customers pay for their fares. The first such survey to be completed occurred in June 2016 prior to evaluating fares for the 2017 calendar year.

The following excerpt from the October 23, 2014 Board packet states how the public was involved in the decision to raise fares:

Presentations and public outreach about the potential fare changes has been ongoing since the June 24, 2014 Board meeting. A public notice of the fare change proposal was published in the Statesman Journal newspaper and was posted on the cherriots.org website. The table showing current and proposed fares has been posted to the website since July 24, 2014 and has been handed out at many of the Moving Forward project outreach events if people had questions about fares. Numerous open houses have been scheduled for September and October in the surrounding rural communities of Polk and Marion Counties as well as within the urban Salem-Keizer area. A schedule of events is provided in Attachment C.

A copy of written comments received by citizens to date can be found in Attachment D. Public comments have been generally supportive of increase in fares, especially if there are service changes or benefits that coincide with the increase. The Citizens Advisory Committee, at their September 10, 2014 meeting, voted to recommend to the Board that they adopt the ordinance for a fare change as proposed by staff.

Because the District did not have the survey information to enable a review of the fare change from a race or income level perspective, community input was used to evaluate the fares instead.

Route 15X Restoration Title VI Equity Analysis

April 28, 2016

Salem-Keizer Transit, Planning Department

1. Project Background

In March 2016, the State of Oregon passed a budget bill that included funding the restoration of Route 15X - Airport Rd Park & Ride Express. Although the Airport Rd Park & Ride Express route (formally Route 20) was popular in the past, the service was eliminated from the State's budget as a result of budget cuts after the Great Recession. As a result, Salem Area Mass Transit District (SAMTD) chose to end the service in 2009.

This new route travels from the Airport Rd Park & Ride to the State Capitol Mall. It is primarily designed to allow State employees to park their cars at the Airport Rd Park & Ride and quickly get to the State buildings in the Capitol Mall area. However, this route will be open to the public, so others will have the opportunity to benefit from it.

The route will operate from 6:15 a.m. to 8:53 p.m. It will run at 15-minute headways in the peak commute hours (6:15 a.m. to 9:00 a.m. and 3:00 to 6:00 p.m.) and 30-minute headways in the off-peak hours.

Due to the addition of this new route, the current Route 4 will discontinue its hourly deviation to the Airport Rd Park & Ride.

Figure 1 below shows the current path of Route 4, and Figure 2 shows the planned paths of Routes 4 and 15X. Figure 3 shows a more detailed map for Route 15X, including the route path, stop locations, and time points.

Figure 1. Route 4, Current

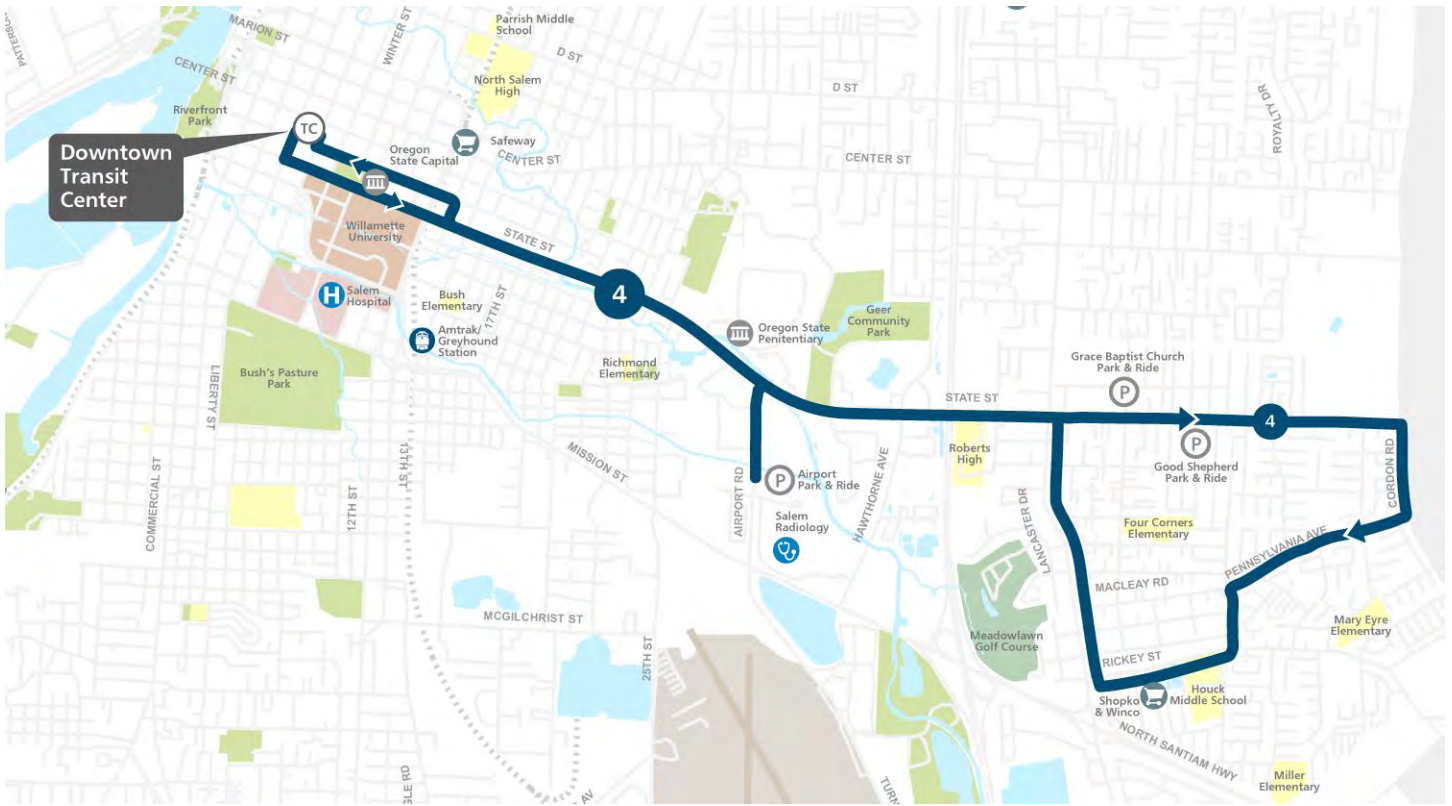


Figure 2. Route 4 and 15X, Planned

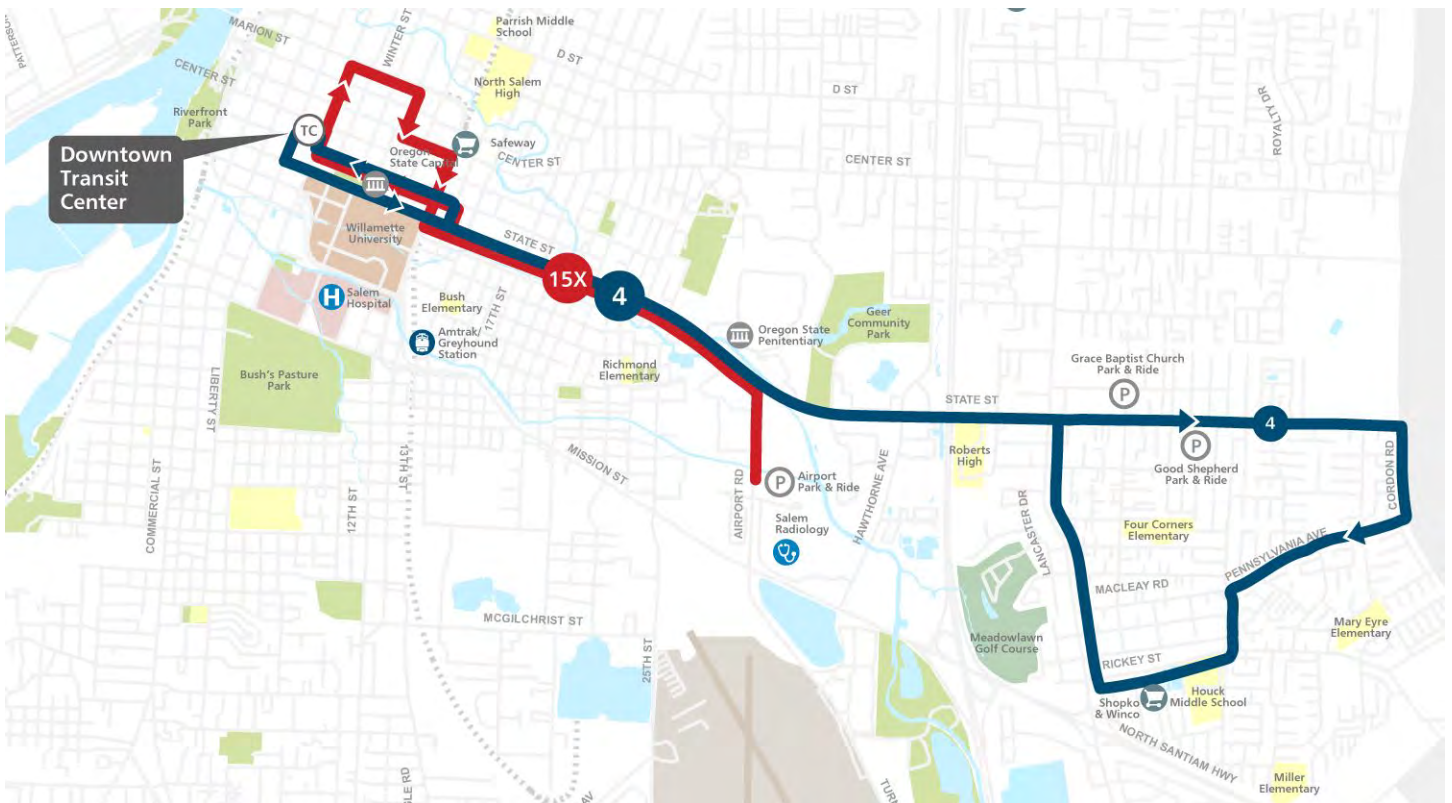
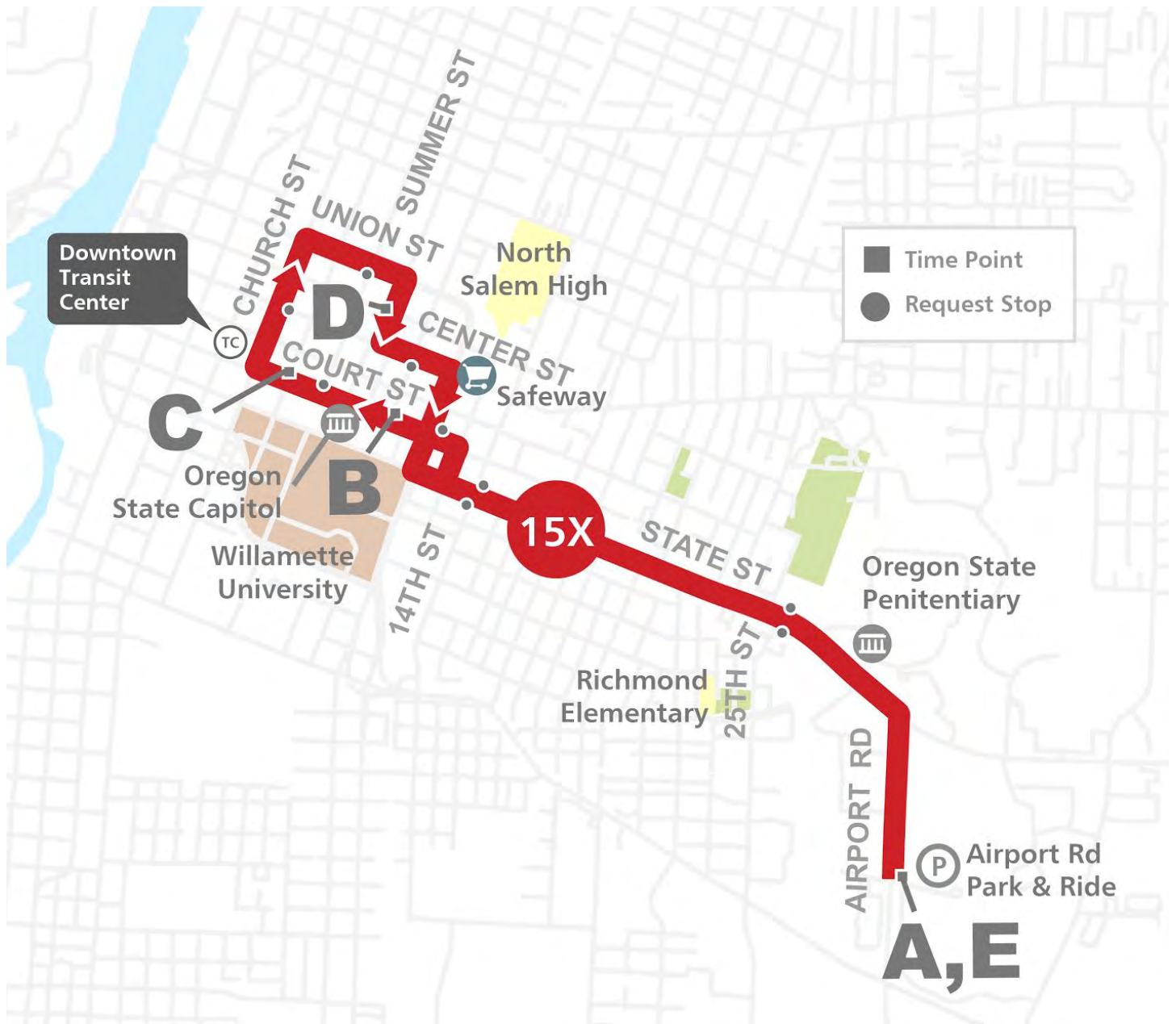


Figure 3. Detailed Map of Planned Route 15X



2. Title VI Requirements

As a recipient of Federal financial assistance, SAMTD must ensure that service changes – both increases and reductions – comply with Title VI 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 FTA has provided specific implementing guidelines and regulations for complying with Title VI in Circular 4702.1B (“Circular”). Due to the interrelated nature of race/ethnicity and income, the Circular instructs transit

agencies to consider impacts on low-income populations as well as minority populations; the assessment of potential Title VI issues related to service changes is completed through a service equity analysis.

3. SAMTD Title VI Compliance

In the spring of 2014, SAMTD updated its Title VI program to comply with the latest Circular. A letter of concurrence was received in December 2015 from the FTA stating that the SAMTD Title VI Program complies with the Circular. The program outlines agency policies, definitions, and procedures for complying with Title VI and performing equity analyses. This includes the agency's Major Service Change, Adverse Effects, Disparate Impact, Disproportionate Burden, and Public Hearing policies.

3.1. Major Service Change Policy

All changes in service meeting the definition of Major Service Change are subject to a Title VI Equity Analysis. A Major Service Change is defined as:

1. Either a reduction or an expansion in service of:
 - a. 25 percent or more of the number of transit route miles, or;
 - b. 25 percent or more of the number of transit vehicle revenue hours, computed on a daily basis for the day of the week on which the change is made, or;
2. A new transit route is established.
3. If changes in service on a route to be effective at more than one date within any fiscal year would equal or exceed 1(a) and/or 1(b) above, the changes in total will be considered a Major Service Change, and a Disparate Impact Analysis will be completed in advance of action on the proposed change.

3.2. Adverse Effects Definition

Adverse effects of Major Service Changes are defined as a decrease in the level of transit service (span in days and/or hours, and/or frequency) and/or decreased access to transit service defined as an increase of the access distance to beyond one-quarter mile of bus stops served by less than 4 buses per hour in peak service periods or one-half mile for bus stops served by 4 or more buses per hour in peak service periods.

3.3. Disparate Impact Policy

Testing for Disparate Impact evaluates effects on minority riders or populations as compared to non-minority riders or populations. "Minority" is defined as all persons who identify as being part of a racial/ethnic group besides white, non-Hispanic.

3.3.1. Disparate Impact Definition

1. A Major Service Change to a route will be considered to have a disparate impact if condition a, b, and either condition c or d below is found to be true:
 - a. The percentage of impacted minority population in the service area of the route exceeds the percentage of minority population of the SAMTD District as a whole, and;
 - b. If the percentage of impacted minority population differs from the percentage of impacted non-minority population by more than 20 percent, the overall impact of changes will be considered disparate.
 - c. In the event of service reductions, the service change has an adverse effect on the minority population in the service area of the route.

- d. In the event of service additions, the addition is linked to other service changes that have adverse effects on the minority population in the service area of the route, or; the service addition on the subject route is linked with a service change(s) on other route(s) that have adverse effects on the minority population in the service area of that route or routes.

3.4. Disproportionate Burden Policy

Testing for a Disproportionate Burden evaluates potential effects on low-income riders or populations, defined as riders or populations at or below 100% of the federal poverty level.

3.4.1. Disproportionate Burden Definition*

1. A Major Service Change to a route will be considered to have a [disproportional burden] if condition a, b, and either condition c or d below is found to be true:
 - a. The percentage of impacted [low-income] population in the service area of the route exceeds the percentage of [low-income] population of the SAMTD District as a whole, and;
 - b. If the percentage of impacted [low-income] population differs from the percentage of impacted [non-low income] population by more than 35 percent, the overall impact of changes will be considered [disproportional].
 - c. In the event of service reductions, the service change has an adverse effect on the [low-income] population in the service area of the route.
 - d. In the event of service additions, the addition is linked to other service changes that have adverse effects on the [low-income] population in the service area of the route, or; the service addition on the subject route is linked with a service change(s) on other route(s) that have adverse effects on the [low-income] population in the service area of that route or routes.

* SAMTD's official Disproportionate Burden policy unintentionally refers to disparate impacts and minorities instead of disproportionate burdens and low-income populations. This language has been modified in the above definition to clarify the intended definition.

3.5 Public Hearing Policy

The District's public hearing policy is as follows:

The District shall hold a public hearing when a reduction in transit service or fare increase as defined above are proposed by the District. Notice must be published in a general circulation newspaper. In addition, notice will be placed in newspapers, publications, or internet sites that are oriented to specific groups or neighborhoods that may be affected by the proposed service reduction or fare increase. The notice must be published at least 30 days prior to the hearing. The notice must contain a description of the proposed service reduction or fare increase, and the date, time, and place of the hearing.

4. Equity Analysis

In order to determine whether these planned service changes had the potential to lead to a disparate impact or disproportionate burden, District staff used the above definitions to analyze the difference between the current service and the planned service.

4.1 Major Service Change Test

The establishment of the new Route 15X meets the definition of a major service change.

The elimination of service to the Airport Rd Park & Ride on Route 4 will result in a decrease in roundtrip revenue miles from 11.41 miles to 9.76 miles, a 14.5% decrease. This does not constitute a major service change because there is no change in service hours and the number of revenue hours is decreasing by less than 25%.

4.2 Adverse Effects Test

Based on the adverse effects definition, the Route 15X major service change does not have potential adverse effects because there is no decrease in the level of transit service and/or decreased access to transit service.

Although Route 4 will no longer service the Airport Rd Park & Ride once an hour, Route 15X will service it every 15 minutes during the peak and every 30 minutes in the off-peak.

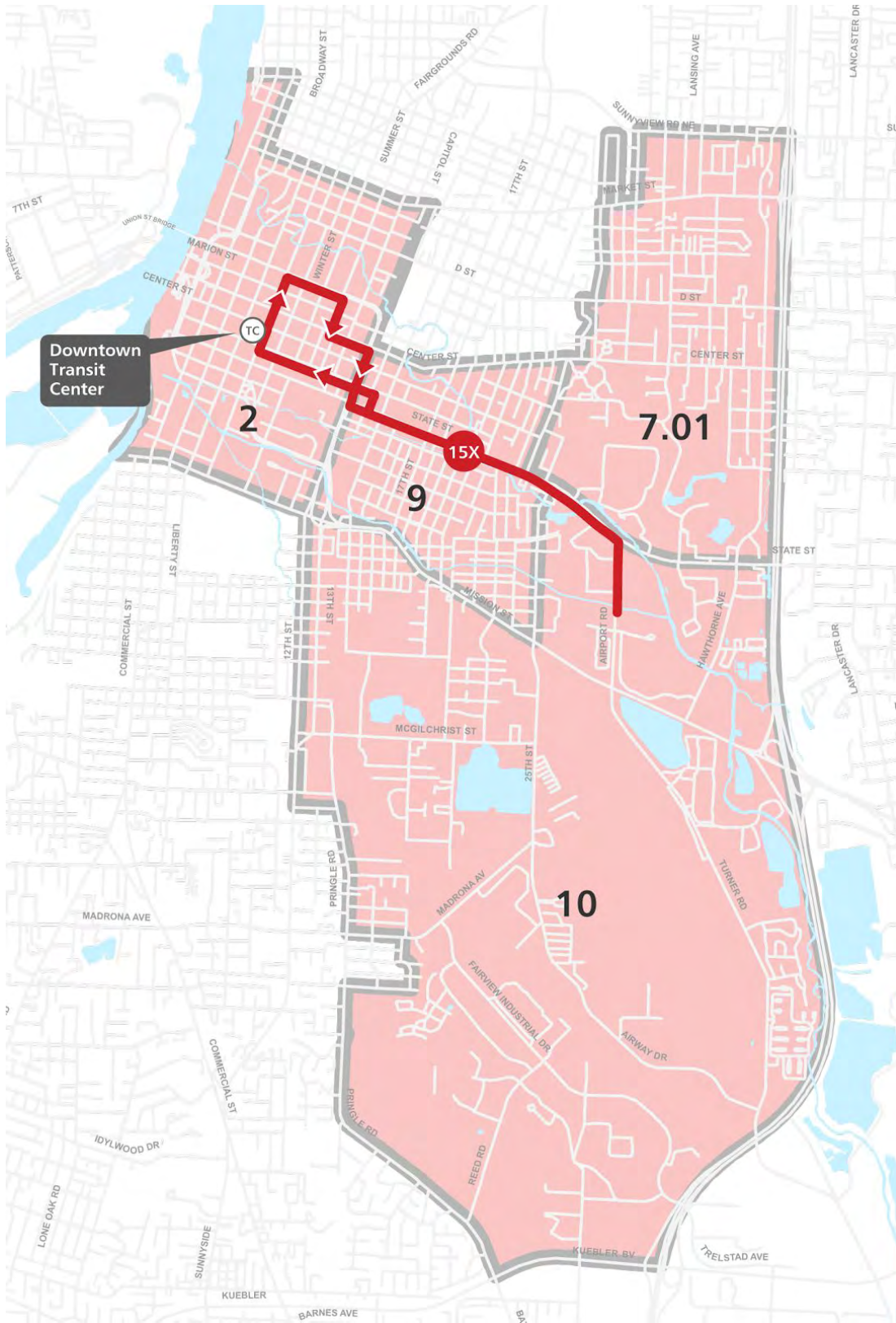
4.3 Disparate Impact and Disproportionate Burden Tests

Route 15X will travel through four census tracts. On average, their share of minorities (35.8%) and low-income residents (29.6%) is higher than the SAMTD service area on the whole (32.1% and 18.7%, respectively). On the whole, minority and low-income populations stand to benefit more from this service increase than non-minority and higher-income populations. (See Table 1 and Figure 4 below.)

Table 1. Share of Minority and Low-Income Residents Living in Census Tracts Near Route 15X Compared to SAMTD Service Area Average

Census Tract	Minorities	Total Pop	% Min	Poverty	Total Pov. Pop	% Poverty
2	479	3,356	14.3%	722	2,187	33.0%
7.01	3,346	7,718	43.4%	2,217	5,554	39.9%
9	2,202	5,582	39.4%	882	5,263	16.8%
10	1,310	3,823	34.3%	1,031	3,469	29.7%
Route 15X Service Area Total	7,337	20,479	35.8%	4,852	16,413	29.6%
SAMTD Service Area			32.1%			18.7%

Figure 4. Route 15X Service Area (Census Tracts 2, 7.01, 9, and 10)



A potential Disparate Impact and Disproportionate Burden could exist if this service change resulted in a reduction in service or was linked to other service changes that had adverse effects on minority or low-income populations. However, this is not the case as this service change is a service increase. As a result, no Disparate Impact or Disproportionate Burden are found.

4.4 Public Hearing Test

There is no public hearing requirement because this is a service increase. Public hearings are only required for service decreases and fare increases.

5. Summary and Discussion

Given the available data and established methodology, implementing these changes does not appear to have an adverse effect on minority and low-income populations. The District therefore finds no Disparate Impact or Disproportionate Burden associated with the restoration of Route 15X.

The new Route 15X will begin service on June 6, 2016.

Attachment N: Categorical Exclusion Worksheet for the South Salem Transit Center Project

The following is a copy of the Categorical Exclusion Worksheet for the environmental review of the South Salem Transit Center project.

**FTA Region 10
CATEGORICAL EXCLUSION and
DOCUMENTED CATEGORICAL EXCLUSION WORKSHEET**

Note: The purpose of this worksheet is to assist sponsoring agencies (grantees) in gathering and organizing materials for environmental analysis required under the National Environmental Policy Act (NEPA), particularly for projects that may qualify as a Categorical Exclusion (CE) or Documented Categorical Exclusion (DCE). The use and submission of this particular worksheet is NOT required. The worksheet is provided merely as a helpful tool for assembling information needed by FTA to determine the likelihood and magnitude of potential project impacts. **NOTE: Fields are expandable, so feel free to use more than a line or two if needed.**

Submission of the worksheet does not satisfy NEPA requirements. FTA must concur in writing in the sponsoring agency's NEPA recommendation. Project activities may not begin until this process is complete. Contact the FTA Region 10 office at (206) 220-7954 if you have any questions or require assistance. If this is the first time you have filled out this form, FTA encourages you to review http://www.fta.dot.gov/documents/FTA_CE_Presentation.pdf. Feel free to contact Region 10 for additional assistance. **Please see the end of this document for submittal procedures.** For links to other agencies or for further topical guidance, please go to Region 10's [Grantee Resources: Environment](#) site.

I. Project Description		
Sponsoring Agency Salem Area Mass Transit District (District)	Date Submitted October 29, 2015	FTA Grant Number(s) (if known) OR-15-X001
Project Title South Salem Transit Center		
Project Description (brief, 1-2 sentences) The project consists of the construction of a transit center on a portion of a Walmart parking lot in the south of Salem. The transit center would include six (6) bus bays and bus shelters, driver and passenger amenities, landscaping, stormwater facilities, and reconfiguring a portion of the Walmart parking lot adjacent to the transit center. See Attachment 1 for a vicinity map and a site plan for the South Salem Transit Center project and photographs of the project area.		
Purpose and Need for Project (brief, 1-2 sentences, include as an attachment if adopted statement is lengthy) The purpose of the South Salem Transit Center is to improve the efficiency and effectiveness of transit service by consolidating local and regional transit services at a single location, implementing the "3C" concept [neighborhood circulators, outlying transit centers, and high frequency corridors] as defined in the Strategic Business Plan adopted by the District's Board, providing user-friendly transitions between public transit services and pedestrians, bicyclists and other transportation modes, and supporting city and community plans. See Attachment 2 for the project's full Purpose and Need statement and the project objectives and site evaluation criteria that was used in the site selection process.		
Project Location (include City and Street address) Portion of Walmart parking lot located at 5250 Commercial Street SE, Salem, OR 97306		
Project Contact (include phone number, mailing address and email address) Bryon McNatt, Project Manager Salem Area Mass Transit District 503-361-7503 220 High Street NE Salem, OR 97301 Bryon.mcnatt@cherriots.org		

If your project involves construction, include the following:

- Project vicinity map
- Project site plan showing access points and project boundaries
- Other useful maps as appropriate (topo, for instance, depending on circumstances, and/or Google Earth aerial, NEPA Assist, etc.)
- A few photographs of the site if useful to illustrate important features
- Details pertaining to the depth of soil excavation
- Note if the soil has been previously disturbed by prior construction or other activity
- List parks or recreation areas within the project vicinity
- Any previous consultations that might be relevant? (HUD, SHPO, or DOTs)

See Attachment 1 for a project vicinity map, site plan (including access points and the extent of the project) and photographs of the project area. Additional maps of the project area, such as of the existing land uses, are provided in other attachments to this worksheet. These attachments are referenced in Part III of this worksheet, as needed, to provide supplemental information.

See Part III, Section M and Attachment 10 for information on prior ground disturbance in the project area, the proposed maximum depths of ground disturbance related to project construction, and Section 106 consultations with the Oregon State Historic Preservation Office (SHPO) and concerned tribes. See Part III, Section O and Attachment 5 for information on parks and recreation areas within the project vicinity.

II. NEPA Class of Action

Answer the following questions to determine the project's potential class of action. If the answer to any of the questions in Section A is "YES", contact the FTA Region 10 office to determine whether the project requires preparation of a NEPA environmental assessment (EA) or environmental impact statement (EIS).

A. Will the project significantly impact the natural, social and/or economic environment?

- YES (contact FTA Regional office)
 NO (continue)

A.1 Is the significance of the project's social, economic or environmental impacts unknown?

- YES (contact FTA Regional office)
 NO (continue)

A.2 Is the project likely to require detailed evaluation of more than a few potential impacts?

- YES (contact FTA Regional office)
 NO (continue)

A.3 Is the project likely to generate intense public discussion, concern or controversy, even though it may be limited to a relatively small subset of the community?

- YES (contact FTA Regional office)
 NO (continue)

B. Does the project appear on the following list of Categorical Exclusions (CEs)?

The types of activities listed below describe actions which, when the corresponding conditions are met, are under usual circumstances categorically excluded from further NEPA analysis under [23 CFR 771.118\(c\)](#). Unusual circumstances may include, but are not limited to, the presence of wetlands, historic buildings and structures, parklands, or floodplains in the project area, or the potential for the project to impact other resources. (Descriptions of each type of activity, and corresponding conditions, are available [here](#); this worksheet simply lists the name of each exclusion.)

- YES (If checked AND there are no special circumstances, check the applicable box and briefly describe the activity in Section III. A; then proceed to the signature block on the back page.)
 NO (continue to Section II. C)

[23 CFR 771.118\(c\)\(1-16\)](#)

- (1) Utility and Similar Appurtenance Action
 (2) Pedestrian or Bicycle Action

- (3) Environmental Mitigation or Stewardship Activity
- (4) Planning and Administrative Activity
- (5) Activities Promoting Transportation Safety, Security, Accessibility and Communication
- (6) Acquisition, Transfer of Real Property Interest
- (7) Acquisition, Rehab, Maintenance of Vehicles or Equipment
- (8) Maintenance, Rehab, Reconstruction of Facilities
- (9) Assembly or Construction of Facilities
- (10) Joint Development of Facilities
- (11) Emergency Recovery Actions
(Several conditions attach to this type of CE. We recommend you consult with FTA if you think this CE may apply to your action.)
- (12) Projects Entirely within the Existing Operational Right-of-Way.
- (13) Federally Funded Projects
(Must be less than \$5 million in federal funding, or having a total estimated cost of not more than \$30,000,000 and Federal funds comprising less than 15 percent of the total estimated project cost.
- (14) Bridge Removal and Related Activities.
- (15) Preventative Maintenance to Certain Culverts and Channels
- (16) Geotechnical and Similar Investigations

C. Does the project appear on the following list of potential documented Categorical Exclusions?

Projects that are categorical exclusions under [23 CFR 771.118\(d\)](#) require additional documentation demonstrating that the specific conditions or criteria for the CEs are satisfied and that significant effects will not result.

YES (Check correct box below and continue to Part III)

NO (Contact FTA Regional Office)

[23 CFR 771.118\(d\)\(1-8\)](#)

- (1) Modernization of a highway by resurfacing, restoring, rehabilitating, or reconstructing shoulders or auxiliary lanes.
- (2) Modernization of a highway by resurfacing, restoring, rehabilitating, or reconstructing shoulders or auxiliary lanes.
- (3) Acquisition of land for hardship or protective purposes. (NOTE: Hardship and protective buying will be permitted only for one or a limited number of parcels, and only where it will not limit the evaluation of alternatives (including alignments) for planned construction projects.
- (4) Acquisition of right-of-way. (NOTE: No project development on the acquired right-of-way may proceed until the NEPA process for such project development, including the consideration of alternatives, where appropriate, has been completed.)
- (5) Construction of bicycle facilities within existing transportation right-of-way.
- (6) Facility modernization through construction or replacement of existing components.
- (7) Minor realignment for rail safety purposes

- (8) Facility modernization/expansion outside existing ROW
- "Other" actions which meet the criteria for a CE in the CEQ regulations (40 CFR 1508.4) and will not result in significant environmental effects. Actions must not: induce significant impacts to planned growth or land use; require the relocation of significant numbers of people; have a significant impact on any natural, cultural, recreational, historic or other resource; cause significant air, noise, or water quality impacts; have significant impacts on travel patterns; or otherwise have significant environmental impacts (either individually or cumulatively).

III. Information Required for Documented Categorical Exclusions

If you checked "Yes" to any of the options in Part II. C, complete each relevant subject area for Part III. Sections B-AA and submit to FTA. Depending on the project, some of the subject areas may not be applicable. In such cases, no discussion is needed.

The list below is not all-inclusive. If your proposed project has the potential to cause impacts to resources which are not listed below, please provide supplemental information about those potential impacts.

A. Detailed Project Description

Describe the project and explain how it satisfies the purpose and need identified in Part I.

As shown in the site plan in Attachment 1, the South Salem Transit Center would consist of two rows of bus bays along the east and west sides of the current landscaped buffer in the southwest portion of the existing Walmart parking lot adjacent to Commercial Street and Baxter Road. The transit center would accommodate up to six buses; two along Commercial Street and four within the Walmart property. In addition, there would be a bay for the Cherry Lift demand-response service at the south end of the transit center. There is a significant elevation change between Commercial Street and the Walmart parking lot, which would require the buses on the east side of the transit center to travel up an inclined ramp. Bus shelters and driver and passenger amenities would be located in the center island between the two rows of bus bays.

The two Commercial Street bus bays would be accessed from the south. To access those bays, northbound buses would exit the traffic lane on Commercial Street and pull into one of the two bus bays. To continue north, buses would simply pull out of the bus bay and re-enter the traffic lane at a break in traffic. The existing northbound Commercial route bus pullout would be moved south of its current location and, along with the other northbound bay, would be pulled out of traffic and separated from Commercial Street by a landscaped island. To allow for continuous pedestrian movement, and avoid creating new pedestrian crossings, the sidewalk along Commercial Street would be slightly relocated through the transit center to the east of the northbound bus bays.

The four bus bays on the Walmart lot (oriented south) would be accessed from a new driveway on Commercial Street. Buses can access the driveway from the north or from the south. To enter into the transit center from the north, buses would need to make a left turn from the center turn lane along Commercial Street. The left turn into the transit center would be at an unsignalized location. To enter the transit center from the south, buses would make a right turn from Commercial Street.

On the east side of the transit center, to reduce potential vehicle and pedestrian conflicts, buses would be separated from the Walmart parking lot by a raised curb and a landscaped strip. Three pedestrian crosswalks across the bus lane (at the north end, center and south end of the transit center) would provide pedestrians with access between the transit center and Walmart.

To exit the transit center, buses would continue south and east in a bus only lane to a shared, existing driveway onto Baxter Road. To continue, buses would turn right onto Baxter Road and

then access Commercial Street at the signalized intersection of Baxter Road and Commercial Street. At that point, buses could turn right or left on Commercial Street, or continue west on Baxter Road.

See Attachment 3 for a summary table description of the proposed improvements, existing environmental conditions, and potential project impacts.

The proposed South Salem Transit Center satisfies the project's purpose and need identified in Part I, and included in Attachment 2, as follows:

- **Improve the efficiency and effectiveness of transit:** The transit center would consolidate transit service in the southern portion of the City of Salem at a single transit center, implementing the "3C" service concept adopted by the District's Board. The transit center would also improve the ease of transfers between bus routes. The location of the South Salem Transit Center minimizes route deviation for existing and planned bus routes, has access to major streets, avoids negatively impacting emergency access and nearby traffic operations, and is a large enough site and design to accommodate the program needs.
- **Providing user-friendly transitions:** The South Salem Transit Center would be located at the intersection of Commercial Street, an arterial developed with commercial uses, and Baxter Road; providing for easy automobile access (including drop off). The transit center would improve the ease of transfers between bus routes while minimizing route deviation. Within the vicinity of the South Salem Transit Center the existing sidewalks are wide and well maintained and crosswalks at signalized intersections would provide safe pedestrian access to the transit center. The proposed sidewalks to the transit center would maintain the safe pedestrian access. Commercial Street includes bicycle lanes that would provide bicyclists with access to the transit center. The design of the transit center would provide safe pedestrian and bicycle access to and from bus platforms, particularly providing safe pedestrian access between the transit center and Walmart. In addition, the transit center's visibility from Commercial Street, which includes nearby businesses with extended hours, would be expected to increase the sense of security of users at the transit center.
- **Supporting city and community plans:** The South Salem Transit Center would obtain land use approvals, as needed, to support the City of Salem's planned land use for the area. The South Salem Transit Center would fit into its surrounding commercial uses, would support the neighborhood activity center and would be consistent with plans for this growing residential area. The South Salem Transit Center would be visually integrated with the existing development along Commercial Street and would provide transit service to and from adjacent neighborhoods. The South Salem Transit Center minimizes business relocations. There is one business, a locksmith, currently located in a mobile facility within the proposed transit center location in the Walmart parking lot. During their discussions with Walmart the District would assist with finding another suitable location for the locksmith business within the Walmart parking lot. The South Salem Transit Center would avoid other environmental impacts, such as increases in noise levels, filling a wetland or crossing a stream.

B. Location and Zoning

Attach a map identifying the project's location and surrounding land uses. Note any critical resource areas (historic, cultural or environmental) or sensitive noise or vibration receptors (schools, hospitals, churches, residences, etc). Briefly describe the project area's zoning and indicate whether the proposed project is consistent with it. Briefly describe the community (geographic, demographic, economic and population characteristics) in the project vicinity.

Attachment 4 includes a map of the existing land uses and a map of the City of Salem's zoning designations in the area around the proposed South Salem Transit Center. There are no critical resource areas (historic, cultural or environmental) on or in the immediate vicinity of the proposed South Salem Transit Center. See Attachment 5, the South Salem Transit Center project's Environmental Critical Issues Report and Attachment 10, the project's Historic Resources Memorandum and Cultural Resources Study. The locations of sensitive noise or vibration receptors in the vicinity of the proposed South Salem Transit Center are identified in Attachment 9 (the Noise and Vibration Technical Memorandum).

The proposed South Salem Transit Center would be located partially within the existing public right of way for Commercial Street and partially on a portion of an existing Walmart parking lot, a commercial use. In addition to the Walmart commercial use, there is a locksmith business that is currently located in a mobile facility within the proposed transit center location (see Attachment 1, photo 5). During their discussions with Walmart the District would assist with finding another suitable location for the locksmith business within the Walmart parking lot. In the area surrounding the proposed South Salem Transit Center the existing land uses along both sides of Commercial Street are primarily commercial; a utility site is located just north of the Walmart parking lot and south of the Walmart parking lot there is a multi-family residential use. East and west of Commercial Street the existing land use is primarily single family residential and also includes a few more multi-family residential properties, a few churches and properties that are agricultural/farm in use. There are no schools or hospitals in the area of the proposed South Salem Transit Center.

The existing commercial land use of the property on which the South Salem Transit Center would be located complies with its City of Salem Retail Commercial (CR) zoning designation. The portion of the Walmart parking lot along Commercial Street is also within the City of Salem's South Gateway Overlay zone. Within the CR zone and the South Salem Gateway Overlay zone a transit center is a conditional use; the required land use review and approval by the City of Salem will ensure consistency with the City's land use policies and plans. During the project's site selection process, the project team met with City of Salem staff who were generally supportive of siting the transit center at the proposed Walmart parking lot location.

In addition, while the South Salem Transit Center would reduce the number of parking spaces within the Walmart parking lot by approximately 144 spaces, the remaining number of parking spaces would continue to conform to the City of Salem's general retail parking requirements. With a parking requirement of 1 space for every 250 square feet of general retail space, the existing 127,000 square foot Walmart use would require approximately 510 parking spaces. With the South Salem Transit Center, approximately 600 parking spaces would remain in the Walmart parking lot. Further, the existing Walmart parking lot is underutilized.

The land uses in the area surrounding the South Salem Transit Center location generally reflect the City of Salem's zoning designations, which include: General Commercial (CG), Commercial Office (CO), Single Family Residential (RS), Multiple Family Residential 2 (RM2), and Residential Agriculture (RA).

The proposed South Salem Transit Center is located in the South Gateway Neighborhood of Salem. Approximately 22,000 people live within the three census tracts near the proposed South Salem Transit Center. The existing demographics within these three census tracts consists of a population that is 83 percent non-minority (white) and 17 percent minority (non-white). The median incomes of the three census tracts near the proposed South Salem Transit Center range from approximately \$48,000 to \$63,000, which is higher than the median income of the City of Salem overall (approximately \$46,000). The percentage of low-income households ranges from 8 to 13 percent, which is less than the City of Salem overall (16 percent). For more information see the Environmental Justice section of Attachment 5, the Environmental Critical Issues Report.

C. Traffic

Describe potential traffic and parking impacts, including whether the existing roadways have adequate capacity to handle increased bus or other vehicular traffic. Include a map or diagram if the project will modify existing roadway configurations. Describe connectivity to other transportation facilities and modes, and coordination with relevant agencies.

Attachment 6 includes the South Salem Transit Center Design Options Transportation Assessment technical memorandum prepared for the project on October 8, 2014.

The South Salem Transit Center would include two rows of bus drop-off/pick-up bays along the east and west sides of the current landscaped buffer on the east side of Commercial Street. To access the two Commercial Street bus bays northbound buses would enter a bus-only pullout area off of Commercial Street; this pullout would replace the existing bus pullout to the north. A new bus-only, unsignalized driveway from Commercial Street would provide access to the four bus bays on the Walmart lot. Buses would exit the transit center using the existing Walmart driveway onto Baxter Road and then access Commercial Street at the signalized intersection of Commercial Street and Baxter Road.

The South Salem Transit Center would consolidate the District's transit service in the southern portion of the City of Salem. The location of the South Salem Transit Center would be easily accessible by other transportation modes. Streets adjacent to the transit center would provide for easy automobile access and well maintained sidewalks, crosswalks and bicycle lanes along Commercial Street would provide pedestrian and bicycle access to the transit center. The transit center's design would provide for safe pedestrian and bicycle circulation within the center.

The project's transportation assessment evaluated four design options for the South Salem Transit Center. Design Option 1 is most similar to the proposed design of the South Salem Transit Center, as described above and shown in the site plan in Attachment 1. The project's transportation assessment evaluated the operational, capacity or circulation-based constraints of the no build alternative and the South Salem Transit Center for the existing year (2014), near-term future year (2020) and longer-term future year (2035). As stated in the transportation assessment, the critical Commercial Street/Baxter Road signalized intersection is forecast under near- and long-term traffic conditions to continue to operate with sufficient capacity, level of service (LOS) C, when incorporating the additional traffic anticipated to be generated by the South Salem Transit Center. As with the 2035 no build traffic conditions, the westbound left-turn movement at the Commercial Street/North Walmart driveway (north of the new bus-only driveway into the transit center) is forecast to operate at LOS F and over capacity. However, assuming the demand at the access shifts to the access to the site via Baxter Road, the Commercial Street/Baxter Road signalized intersection would have sufficient long-term capacity to accommodate the extra demand.

The South Salem Transit Center would reduce the number of parking spaces within the Walmart parking lot by approximately 144 spaces. Approximately 600 parking spaces would remain in the Walmart parking lot, which would comply with the City of Salem's general retail parking requirements. There is no on-street parking along either Commercial Street or Baxter Road; therefore, the project would not eliminate existing on-street parking.

During the project's site selection process, the project team met with City of Salem staff who were generally supportive of siting the transit center at the proposed Walmart parking lot location. During the project's final design and implementation the District would continue to closely coordinate with the City of Salem, including obtaining required land use approvals and permits. During the project's final design and implementation the District would also work closely with Walmart to acquire the property needed for the South Salem Transit Center and to reconfigure the surrounding parking lot, as needed, to minimize circulation and parking impacts.

D. Aesthetics

Will the project have an adverse effect on a scenic vista?

- No
 Yes, describe

Will the project substantially degrade the existing visual character or quality of the site and its surroundings?

- No
 Yes, describe

The South Salem Transit Center would be located within an existing transportation corridor with urban commercial development. See the photographs of the site and surrounding area in Attachment 1. The transit center would include six (6) individual bus shelters for each bay within the transit center; each shelter would be approximately 20-feet in length, 8-feet in depth and 8-feet in height. The driver relief building would be a single-story, small scale building approximately 600 square feet in area (30-feet in length and 20-feet in width). Informational signage would also be provided.

The project would comply with the City of Salem's development standards for the CR zone and South Gateway Overlay Zone; including setbacks, building height, landscaping, street trees and signage. Therefore, the project would not substantially degrade the existing visual character or quality of the site and its surroundings.

Will the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

- No
 Yes, describe

New lighting would be provided at the South Salem Transit Center. The new lighting would be at the height of the bus shelters, and the other driver and passenger facilities, and would be directed downward to adequately light the transit center. The project lighting would not create a new source of substantial light or glare that would adversely affect day or nighttime views. Additionally, it would help provide a safe and secure environment.

E. Air Quality

Does the project have the potential to impact air quality?

- No
- Yes, describe

Is the project located in an EPA-designated non-attainment or maintenance area?

- No
- Yes, indicate the criteria pollutant and contact FTA to determine if a hot spot analysis is necessary.
 - Carbon Monoxide (CO)
 - Ozone (O₃)
 - Particulate Matter (PM₁₀ or PM_{2.5})

See Attachment 7 for the project's Air Quality Technical Memorandum.

The South Salem Transit Center project is located in Marion County, Oregon, within the boundary of the Salem-Keizer Area Transportation Study (SKATS) Metropolitan Planning Organization (MPO). Marion County is currently designated as a CO maintenance area and is in attainment for all other criteria pollutants.

The traffic analysis conducted for the project (see Attachment 6) found that the one signalized intersection near the proposed transit center (at Commercial Street/Baxter Road) would have a LOS C with the project in the years 2014, 2020 and 2035. Since all signalized intersections would have a LOS C or better, the project is exempt from the hot spot analysis per 40 CFR 93.123 (a.ii). CO levels have been and are expected to continue to be below the National Ambient Air Quality Standards. In addition, on July 13, 2015 the project was discussed with Dan Drais, FTA Region 10's environmental lead for the project, who determined that a hot spot analysis would not be necessary.

If the non-attainment area is also in a metropolitan area, was the project included in the MPO's Transportation Improvement Program (TIP) air quality conformity analysis?

- No
- Yes Date of USDOT conformity finding: May 20, 2015; Project B008, Key #19595

F. Coastal Zone

Is the proposed project located in a designated coastal zone management area?

- No
- Yes, describe coordination with the State regarding consistency with the coastal zone management plan and attach the State finding, if available.

G. Environmental Justice

Determine the presence of minority and low-income populations (business owners, land owners, and residents) within about a quarter-mile of the project area. Indicate whether the project will have disproportionately high and adverse impacts on minority or low-income populations. Describe any potential adverse effects. Describe outreach efforts targeted specifically at minority or low-income populations. Guidance is [here](#).

Using information from the 2010 Decennial Census and 2009-2013 American Community Survey 5-year estimates (the most recent available), Section 4.4 of Attachment 5, the project's Environmental Critical Issues Report, describes the presence of minorities and low-income individuals (environmental justice populations) within the three census tracts that intersect a one-quarter mile radius from the proposed South Salem Transit Center and the Walmart parking lot. In addition, the environmental justice analysis in the project's Environmental Critical Issues Report evaluates information from the on-board survey that was conducted for the project between May 21 and June 6, 2013.

The census data shows that the percent of the study area's population that identifies as a racial minority and/or a Hispanic/Latino ethnic minority (17 percent) is lower than that for the City of Salem (29 percent).

Approximately 70 percent of respondents to the on-board survey indicated they are white. Approximately 30 percent were non-white and/or Hispanic/Latino. The similarity in Hispanic/Latino population data for the City of Salem and the on-board survey suggests that transit service in south Salem is used by an ethnic minority percentage that is proportional to the City of Salem's demographics and higher than the proportion that reside within the environmental justice study area.

Similarly, the 2009-2013 American Community Survey 5-year estimate data shows that the percent of the study area's population that live in low-income households is less than the City of Salem (9 percent compared to 16 percent, respectively). The results of the on-board survey showed that the estimated range of transit riders that meet federal poverty thresholds is approximately 28 to 46 percent. In addition, while above the poverty threshold, most on-board survey respondents (approximately 78 percent) reported individual incomes below \$35,000. This is nearly twice the proportion of individuals living in the City of Salem who have incomes less than \$35,000. Therefore, the on-board survey results suggest that transit, including those transit routes that serve south Salem, is used by a higher percentage of low-income individuals than reside within the environmental justice study area.

The project would not displace any residences, businesses, or social services so it would not be expected to change the study area's existing community cohesion or reduce the economic vitality. In addition, the South Salem Transit Center would be located along an already busy transportation corridor that includes transit service and would not increase noise levels or air pollution in the study area. Temporary impacts during construction, such as noise, air pollution and potential traffic delays, would be expected and would be the same for all populations. Furthermore, the minority and low-income populations in the study area are either comparable to, or notably smaller than, those in the City of Salem as a whole. Therefore, environmental justice populations would not be expected to receive a disproportionately high and adverse portion of the project's impacts.

The project may result in benefits to environmental justice populations. In general, transit projects are particularly relevant to environmental justice populations because low-income populations tend to be more dependent on transit service; improvements in transit connections and transit facilities, such as would be provided with the South Salem Transit Center, could

provide greater, or at least equal, benefits to environmental justice populations. During the site selection process the District engaged the south Salem community, including environmental justice populations within the community, by meeting with neighborhood associations, conducting a telephone survey, conducting an on-board survey, conducting stakeholder interviews, and discussing the site selection process at the District's publicly noticed board meetings. As the project development continues, the District would continue to provide project updates on their website, including providing the information in Spanish.

H. Floodplains

Is the proposed project located within the Federal Emergency Management Agency (FEMA) 100-year floodplain?

No

Yes, describe potential impacts, indicate if the project will impact the base flood elevation, and include or link to the FEMA Flood Insurance Rate Map (FIRM) with the project location identified.

I. Hazardous Materials

Is there any known or potential contamination at the project site? This may include, but is not limited to, lead/asbestos in existing facilities or building materials; above or below ground storage tanks; or a history of industrial uses of the site.

No, describe steps taken to determine whether hazardous materials are present on the site.

Yes, note mitigation and clean-up measures that will be taken to remove hazardous materials from the project site. If the project includes property acquisition, identify if a Phase I Environmental Site Assessment for the land to be acquired has been completed and the results.

Attachment 8 is the Hazardous Materials Technical Memorandum prepared for the project.

The South Salem Transit Center would use a portion of existing right of way for Commercial Street and would include the acquisition, or a permanent easement, of a portion of the Walmart parking lot. To evaluate the potential presence of hazardous materials on the project site, or in the immediate vicinity, a search of local, state and federal regulatory databases, performed by Environmental Data Resources, Inc. (EDR), was conducted to identify sites that currently or previously handled, stored, transported, released, or disposed of hazardous or regulated waste. A review of historical land uses was performed, using available maps and historical aerial photos, to identify past business uses in the immediate project vicinity that could have resulted in contamination risk at the project site. A windshield survey was performed on July 28, 2015 to field-verify the location of sites identified in the EDR database query and to identify land uses with an obvious potential for a contamination concern.

No known hazardous materials spills have occurred within the Commercial Street right of way or on the Walmart parking lot; there may have been undocumented small, localized spills from automobiles using the street or parking lot. Four sites are considered to present a low level of concern that, during construction, hazardous materials may be a potential environmental or health hazard. The low potential for contamination during construction activities is based on the size of the past reported spill/release, type of chemical make-up, and proximity to the project site. The four sites include three gas stations and the electrical substation located to the north of the project site. No sites were considered to present a moderate or high risk of hazardous materials

contamination at the project site. Section X of this worksheet describes measures that could be applied during construction to avoid, minimize, or mitigate potential impacts to human health and the environment from hazardous materials.

J. Navigable Waterways

Does the proposed project cross or have the potential to impact a navigable waterway?

No

Yes, describe potential impacts and any coordination with the US Coast Guard.

K. Noise and vibration

Does the project have the potential to increase noise or vibration?

NO

YES, describe impact and provide map identifying sensitive receptors such as schools, hospitals, parks and residences. If the project will result in a change in noise and vibration sources, you must use FTA's "Transit Noise and Vibration Impact Assessment" methodology to determine impact.

Attachment 9 is the Noise and Vibration Technical Memorandum that was prepared for this project.

In accordance with FTA screening procedures, provided in Chapter 4 of the *FTA Transit Noise and Vibration Impact Assessment*, the study area to assess the project's potential noise impacts is defined as 225 feet from the design limits of the transit center. It is anticipated that the loudest noise-generating activities would be at the transit center entrance, exit, and bus bays. Following the FTA's vibration assessment methodology, the study area to assess the project's potential vibration impacts is 50 feet from the design limits. The vibration impact study area was set at 50 feet because only Category 2 (residential) land uses are located nearby the proposed South Salem Transit Center; however, the existing Category 2 land uses in the vicinity of the transit center are located further than 50 feet from the project site.

Within the 225 foot noise screening distance from project improvements, existing land uses along both sides of Commercial Street are primarily commercial, including the Walmart parking lot and locksmith building currently located on the project site. A utility substation is located just north of the Walmart parking lot. Further east and west of Commercial Street and north and south of Baxter Road, beyond the 225 foot screening distance from the project limits, there are multi-family and single-family residential land uses (FTA Land Use Category 2). A few churches and properties that are agricultural/farm in use are also located beyond the project's screening distance. There are no schools or hospitals in the area of the project. See Figure 5 in Attachment 9. Based on the existing land use characteristics of the South Salem Transit Center's study area, a mixed use corridor surrounding an arterial roadway, the common outdoor sound levels were estimated to be between 50 to 60 dBA.

Within the 225 foot screening distance/noise study area the project is anticipated to result in no noise impact, as defined by the FTA and shown in Figure 4 of Attachment 9. This is because: there are no Category 1, 2, or 3 noise-sensitive land uses within the 225 foot FTA noise screening distance; multiple transportation related noise sources and other urban noise sources already exist in the noise study area that result in an ambient noise level of 50 to 60 dBA; the South Salem Transit Center would be located adjacent to existing public street right of way that includes existing bus service; and the project would not substantially increase existing bus service or traffic volumes. Beyond the 225 foot screening distance the project may result in

minor increases in noise levels at noise-sensitive locations; however, the FTA has determined that noise impacts are unlikely to occur at distances greater than 225 feet from the center of proposed transit centers. Therefore, potential minor noise level increases beyond the 225 foot screening distance might be noticeable but would be expected to result in an insignificant increase in the number of people highly annoyed by the new noise.

Within the 50 foot screening distance/vibration study area the project is not anticipated to result in long-term operational vibration impacts, as defined by the FTA and summarized in Table 1. This is because within the study area there are no Category 1, 2 or 3 vibration-sensitive land uses and because multiple transportation-related vibration sources already exist, including existing bus service. Beyond the 50 foot screening distance the project may result in minor increases in vibration levels at vibration-sensitive locations; however, the FTA has determined that vibration impacts to residential uses (Category 2 Land Uses) are not likely to occur at distances greater than 50 feet from bus projects.

See Section S, Construction Impacts, for a discussion of potential temporary noise impacts during construction.

L. Prime and Unique Farmlands

Does the proposal involve the use of any prime or unique farmlands?

No

Yes, describe potential impacts and any coordination with the Soil Conservation Service of the U.S. Department of Agriculture.

M. Historic & Cultural Resources

Impacts to cultural, historic, or recreational properties may trigger Section 106 or tribal consultations or a Section 4(f) evaluation, requiring consideration of avoidance alternatives. Does the project involve any ground disturbing activities?

No

Yes, provide the approximate maximum ground disturbance depth. Also provide information on previous disturbances or where ground disturbance will occur.

In compliance with Section 106 of the National Historic Preservation Act of 1966 and its implementing regulations (36 CFR 800) a cultural resource survey was conducted for the South Salem Transit Center project.

The table below provides the types of potential construction activity that would occur during construction of the South Salem Transit Center and the approximate maximum depth of excavation/ground disturbance. The transit center would be located in an urban area where the ground has previously been disturbed.

Potential Construction Activity	Anticipated Maximum Depth of Excavation	
Station Platforms	8 feet	
Utility trenching (water, dry utilities, Intelligent Transit System (ITS), etc.)	11 feet	
Stormwater utility trenching (if needed to be relocated)	12 feet	
Sanitary sewer utility trenching (if needed to be relocated)	12 feet	
Canopy Shelter	Spread footing	10 feet
	Drilled shaft	16 feet
Stormwater treatment facilities	12 feet	
Transit center pavement and sidewalks	6 feet	
Retaining wall	12 feet	
Relocation of traffic signals	8 feet	
Relocation of utility poles	8 feet	
Driver relief building footing	11 feet	

In April 2015 background research and field reconnaissance was conducted for the South Salem Transit Center project. No archaeological resources were identified in the project's area of potential effects (APE) during the field reconnaissance. It was observed that the APE's land surface has been substantially altered, presumably as a result of a large-scale cut and fill event related to the commercial development of the property. Other parts of the APE have been disturbed by the installation of buried utilities and construction of urban infrastructure. Due to its current condition, the Cultural Resource Study concluded that the project's APE has essentially no potential to contain intact archaeological resources. An Inadvertent Discovery Plan, using the FTA's template, has been prepared and would be implemented if archaeological resources are discovered during ground disturbing construction activities. If archaeological resources are discovered during construction, the District would complete the Section 106 evaluation through coordination with FTA, Oregon SHPO and concerned tribes.

On September 18, 2015 FTA initiated the project's Section 106 consultation with the Oregon SHPO, inviting their comments on the proposed APE and seeking their concurrence on the conclusion that there will be no historic properties affected. On September 25, 2015 the Oregon SHPO sent a letter to the FTA stating that they concurred that "there will be no historic properties affected for this undertaking." On October 19, 2015 the Oregon SHPO sent another letter to the FTA stating that they "concur that a good faith effort has been implemented and the project will likely have no effect on any significant archaeological objects or sites." With these two letters the FTA completed their Section 106 consultation with the Oregon SHPO.

On September 21, 2015 FTA sent similar letters to initiate Section 106 consultation with the concerned tribes. By October 23, 2015, 30 days from when the initiation letters were received, the FTA had not received comments from any of the concerned tribes. Therefore, the FTA completed their Section 106 consultation with concerned tribes.

Are there any historic resources in the vicinity of the project?

No

Yes, Attach photos of structures more than 45 years old that are within or adjacent to the project site and describe any direct or indirect impacts the project may cause.

In compliance with Section 106 of the National Historic Preservation Act of 1966 and its implementing regulations 36 CFR 800, a historic resource survey was conducted for the project to determine if historic properties are present in the APE. Attachment 10 includes the Historic Resources Memorandum for the South Salem Transit Center project.

The historic resource survey included background research and a reconnaissance survey of the site. For the purposes of this project, the APE for historic resources was defined as all tax parcels in or within 100 feet of the proposed development footprint. The APE includes parcels on either side of Commercial Street SE and Baxter Road SE in the immediate project vicinity.

Historic-period resources are defined as those 45 years in age or older and includes all properties constructed by 1970. No buildings or structures built before 1970 are located in the project's APE; the project APE contains commercial properties that were developed between 1974 and 2004. Based on the research and the field reconnaissance, the Historic Resources Memorandum concluded that there are no historic resources within the project's APE and that the project has no potential to impact historic properties.

On September 18, 2015 FTA initiated the project's Section 106 consultation with the Oregon SHPO, inviting their comments on the proposed APE and seeking their concurrence on the conclusion that there will be no historic properties affected. On September 25, 2015 the Oregon SHPO sent a letter to the FTA stating that they concurred that "there will be no historic properties affected for this undertaking." On October 19, 2015 the Oregon SHPO sent another letter to the FTA stating that they "concur that a good faith effort has been implemented and the project will likely have no effect on any significant archaeological objects or sites." With these two letters the FTA completed their Section 106 consultation with the Oregon SHPO.

On September 21, 2015 FTA sent similar letters to initiate Section 106 consultation with the concerned tribes. By October 23, 2015, 30 days from when the initiation letters were received, the FTA had not received comments from any of the concerned tribes. Therefore, the FTA completed their Section 106 consultation with concerned tribes.

N. Biological

Are there any species located within the project vicinity that are listed as threatened or endangered under the Endangered Species Act? Determine this by obtaining lists of threatened and endangered species and critical habitat from the US Fish and Wildlife Service and the National Marine Fisheries Service.

Attachment 11 is the FTA's ESA Screening Checklist for the project that provides information on threatened or endangered species under the Endangered Species Act (ESA).

Information regarding the potential presence of species and critical habitats listed, or proposed for listing under the ESA, was obtained from the US Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS). Within Marion County, NMFS lists no endangered species, two threatened species and no species that are proposed for listing as threatened or endangered. Within Marion County, USFWS lists three endangered species, seven threatened species and no species that are proposed for listing as threatened or endangered. See the table below.

Species	Status
NMFS	
Upper Willamette River Distinct Population Segment	Threatened
Upper Willamette River Evolutionarily Significant Unit	Threatened
USFWS	
Bradshaw's Desert-parsley	Endangered
Willamette Daisy	Endangered
Fender's Blue Butterfly	Endangered
Marbled Murrelet	Threatened
Northern Spotted Owl	Threatened
Streaked Horned Lark	Threatened
Yellow-billed Cuckoo	Threatened
Kincaid's Lupine	Threatened
Nelson's Checker-mallow	Threatened
Water Howellia	Threatened

The project would have no effect on ESA-listed species. The project would not conduct any work below the ordinary high water mark (OHWM) of any surface water and would not eliminate or reduce potential habitat for any ESA-listed species.

The project would create a total of approximately 1,200 square feet of net new impervious surface. The project would also result in an overall net reduction of approximately 17,800 square feet in the total quantity of Pollution Generating Impervious Surfaces (PGIS), by converting existing pollution generating surfaces (roadways, driveways, and parking areas) to non-pollution generating surfaces (sidewalks, landscaped areas, and bus stations). Therefore, even with the slight increase in impervious surface area, the project is not expected to increase the quantity of pollutants delivered to Waln Creek and would result in a slight decrease in the quantity of pollutants delivered to the Battle Creek Watershed.

Describe any critical habitat, essential fish habitat or other ecologically sensitive areas within or near the project area.

According to information obtained from the USFWS, there is no critical habitat within the project area. In addition, the project is not: located within 150 feet of a lake, river, stream or bay; within 0.25 miles of suitable owl or murrelet habitat; and within 1 mile of a known bald eagle nest or within 0.5 miles of a bald eagle nest, wintering concentration, roost or foraging area.

The project is located within the Middle Willamette Essential Fish Habitat area. Construction of the project is not expected to have beneficial or adverse impacts to aquatic resources. The nearest stream is Waln Creek, which is approximately one-quarter mile away. During construction, sediment laden runoff and/or chemical or pollutant spills could decrease the quality of stormwater runoff from construction areas. Such impacts would be prevented and mitigated through the development and implementation of a temporary erosion and sediment control plan (TESC) and a stormwater pollution prevention plan (SWPPP).

No other ecologically sensitive areas are located within or near the project area.

O. Recreational

Is the project located in or adjacent to a park or recreation area?

No

Yes, provide information on potential impacts to the park or recreation area. Please also indicate if the park involved Land and Water Conservation Act funds (Section 6(f))

Section 4.1 of Attachment 5, the project's Environmental Critical Issues Report, includes a map of the parks or recreation areas nearest to the South Salem Transit Center site. The public park nearest to the project site is the Wes Bennett Park, which is located approximately half a mile (0.5 mile) to the east. South of Wes Bennett Park, there is a publicly owned recreation area at Pringle Elementary School. There are no federal, state or locally designated wildlife or waterfowl refuges in the vicinity of the project.

P. Seismic and Soils

Are there any unusual seismic or soil conditions in the project vicinity? If so, indicate on project map and describe the seismic standards to which the project will be designed.

No

Yes, describe

Q. Water Quality

Does the project have the potential to impact water quality, including during construction.

No

Yes, describe potential impacts and best management practices which will be in place.

During construction, sediment-laden runoff and/or chemical or pollutant spills could decrease the quality of stormwater runoff from construction areas. The potential for increased erosion or spills during construction would be prevented and mitigated with the development and implementation of a temporary erosion and sediment control plan (TESC) and a stormwater pollution prevention plan (SWPPP). The TESC would include protecting existing storm drains, protecting stockpiles and exposed soils, and perimeter fencing (or wattles) to prevent sediment from leaving the construction site.

After construction, the project would maintain the boundaries of the existing drainage basins; stormwater would not be transferred from one existing drainage basin to another. In compliance with current City of Salem standards, the project would provide stormwater treatment and flow control under the assumption that greater than 10,000 square feet of new and replaced impervious surfaces would be created. Green stormwater infrastructure would be implemented on the project to the maximum extent feasible. Water quality treatment and flow control are anticipated to be provided through implementation of bioretention facilities. Stormwater features that are likely to be used include an infiltration planter, a biofiltration swale, infiltration basins and a vegetated roof.

Will there be an increase in new impervious surface or restored pervious surface?

No

Yes, describe potential impacts and proposed treatment for stormwater runoff.

The project would create a total of approximately 57,700 square feet of new and replaced impervious surfaces, with an overall net increase of only 1,200 square feet. See the table below. The project would result in an overall net reduction, of approximately 17,800 square feet, of Pollution Generating Impervious Surface (PGIS) by converting existing pollution generating surfaces (roadways, driveways, and parking areas) to non-pollution generating surfaces (sidewalks, landscaped areas, and bus shelters).

Stormwater treatment to reduce pollutant levels from stormwater runoff would be provided for all new PGIS. Therefore, even with the increase in impervious area, the project is not expected to increase the quantity of pollutants delivered to Waln Creek and would result in a slight decrease in the quantity of pollutants delivered to the Battle Creek Watershed. Stormwater treatment is anticipated to use green infrastructure including infiltration basins, an infiltration planter, a biofiltration swale, and a vegetated roof. Infiltration testing and final project funding will ultimately determine the type of facilities that are implemented. The total net reduction in the quantity of PGIS for the project, combined with the proposed stormwater treatment and flow control, would reduce the potential for additional pollutants from project area stormwater to impact downstream water quality.

Battle Creek Watershed Impervious Impacts of South Salem Transit Center				
Impervious Surface Impacts (square feet)			Pollution Generating Impervious Surface Area (square feet)	Disturbed Area (acres)
New & Replaced Impervious Surface Area	Net Impervious Surface Area	Net Pervious Surface Area	Net New PGIS Surface Area	
57,700	1,200	(1,200)	(17,800)	2.0

Is the project located in the vicinity of an EPA-designated sole source aquifer (SSA)?

No

Yes, provide the name of the aquifer which the project is located in and describe any potential impacts to the aquifer. Also include the approximate amount of new impervious surface created by the project. (May require completion of SSA worksheet.)

R. Wetlands

Does the proposal temporarily or permanently impact wetlands or require alterations to streams or waterways?

No

Yes, describe potential impacts

S. Construction Impacts

Describe the construction plan and identify impacts due to construction noise, utility disruption, debris and spoil disposal, and staging areas. Address air and water quality impacts, safety and security issues, and disruptions to traffic and access to property.

Construction of the South Salem Transit Center would include constructing a new bus pullout along Commercial Street, a new driveway off of Commercial Street and busway into the transit center, constructing the transit center platform, utility trenching, moving utility and light poles where necessary, installing bus shelters and other transit center amenities, constructing the driver relief building, and restriping parking spaces within Walmart's parking lot. Construction of the transit center would be expected to take approximately nine (9) months to complete.

The following summarizes the project's potential construction impacts. Mitigation measures to address these impacts are listed in Section X of this Worksheet.

Businesses, Residents, Public Facilities

Project construction could create temporary access and circulation changes to nearby businesses, residences and public facilities. The District would coordinate construction with Walmart and other adjacent businesses and land uses to minimize disruptions. Through the construction contract, the District would require the contractor to maintain access to adjacent land uses during construction.

Noise

Noise during the construction period could be bothersome to nearby residences. Construction workers would also be subject to construction noise while working on the site.

Construction noise is temporary and would vary widely both spatially and time-wise over the course of the project's construction. Project construction would be carried out in several discrete steps, each with its own mix of equipment and, consequently, its own noise characteristics. Construction would be carried out in several discrete steps, each with its own mix of equipment and, consequently, its own noise characteristics. For the project, the highest construction noise levels would likely be associated with concrete removal and material hauling. The most prevalent noise source at the project construction site would be internal combustion engines, such as from earth-moving equipment, material-handling equipment, and stationary equipment. Mobile equipment operates in a cyclical fashion, but stationary equipment (e.g., generators and compressors) operates at sound levels that are fairly constant over time. Because trucks would be present during most construction phases and would not be confined to the project site, noise from trucks could affect more receptors.

Utility Disruption

The project area includes many different types of utilities and utility providers, which is typical in an urban area. Existing utilities include water, sewer, stormwater, electricity, natural gas, and cable/communication. Prior to beginning construction potential utility conflicts will be identified. Generally, utilities under the transit center would be relocated. A few street lights and power poles will also be relocated. The District would work closely with utility providers and the City of Salem to relocate utilities at the start of construction.

Debris and Spoil Disposal

Construction debris and spoils from earthwork, including any potentially contaminated soils, would be disposed of at nearby facilities that are permitted to accept the materials.

Staging Areas

Construction staging would primarily occur within the project's boundaries on the Walmart parking lot. If additional staging area on the Walmart parking lot is temporarily needed, the District would work with Walmart to reach an agreement on the area that could be used and that would minimize disruptions to their business.

Air Quality

During project construction earthwork and ground disturbing activities have the potential to create fugitive dust. Particulate matter (PM₁₀) emissions (dust) during construction would be associated with the movement of dirt during land clearing and ground excavation. In addition, during construction there would be typical emissions from construction equipment, such as carbon monoxide (CO), nitrogen oxides, and diesel exhaust particulate matter. Best management practices (BMPs) to control dust and vehicle emissions would be implemented, see Section X of this Worksheet.

Water Quality

During construction stormwater BMPs would be implemented to prevent sediment-contaminated water from reaching surface water and groundwater resources. A TESC plan and a SPCC plan would be developed and implemented to prevent and mitigate the effects of construction. Elements of the TESC would include fencing and protecting sensitive areas, protecting existing storm drains, protecting stockpiles and exposed soils, and perimeter fencing (or wattles) to prevent sediment from leaving the construction site. The SPCC plan would also be implemented to prevent and prepare for potential chemical or pollutant spills during construction.

Safety and Security

Prior to construction the construction contractor would be required to develop and implement a Construction Safety and Security Plan for this project that addresses the work to be performed. This plan would conform to the provisions of the District's Construction Safety and Security Program and the Oregon (OR-OSHA) occupational safety and health requirements, as applicable. The Construction Safety and Security Plan would be submitted to the District for review and approval. The project's construction contractor would implement this plan and monitor and enforce safety and security requirements. Compliance with the safety and security requirements would be a stipulated provision in all project construction contracts.

Traffic and Property Access

Project construction would primarily occur along the curbside of Commercial Street and Baxter Road and from the Walmart parking lot. There may be some need for closing one of the two northbound lanes on Commercial Street. No driveway closures are expected and minimal traffic detours are anticipated. During construction, the construction contractor would be required to maintain access to adjacent land uses. The District would work with the construction contractor and the City of Salem to minimize traffic delays from lane closures, particularly during high traffic periods.

T. Cumulative and Indirect Impacts

Are cumulative and indirect impacts likely?

No

Yes, describe the reasonably foreseeable:

a) Cumulative impacts, which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes them. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

Based on the potential direct impacts of the project, as discussed throughout Part III of this DCE Worksheet, the project could have minor cumulative impacts to land use, traffic, air quality, noise, environmental justice populations, and water quality. The cumulative impact study area for the project generally includes the area within one (1) mile of the proposed South Salem Transit Center.

According to the City of Salem’s 2030 Comprehensive Plan, in 2005 the Salem-Keizer urban growth area had a population of 218,900, of which 183,500 were in the Salem portion. By 2030 the Salem-Keizer urban growth area is forecasted to be 282,800, of which 242,800 would be in the Salem portion. Therefore, between 2005 and 2030 the City of Salem anticipates their population to increase by approximately 59,000. Some of this growth would be expected to occur within the project’s cumulative impact study area and would likely result in an increase in residents living near the transit center; commercial development along Commercial Street; and traffic volumes on area roadways. From a review of the Salem-Keizer Metropolitan Planning Organization’s Metropolitan Transportation Improvement Program, the City of Salem’s Transportation System Plan and from communications with City of Salem staff on September 3 and 8, 2015, specific actions within the cumulative study area include:

- Construction of a new grocery store at 1410 Barnes Avenue SE
- Expansion of the D&O Garbage facility in the 1000 Block of Boone Road SE
- 201 unit apartment complex on Waln Drive SE, west of Commercial Street (1 mile south of Walmart)
- 60 unit residential nursing facility at the 5100 block of Battlecreek Road SE (about ¾ mile east of Walmart)
- Widening of the Commercial Street/Kuebler Boulevard intersection (construction starts summer 2016)

Land Use

The project would improve transit service and construct infrastructure improvements, which would support the area’s anticipated population growth and associated land use development. The incremental impact of the project in combination with other past, present and reasonably foreseeable projects is the potential increase in residential and commercial development along Commercial Street SE. This growth would be done in compliance with the City of Salem’s plans and zoning regulations. Therefore, it is anticipated that the project would have a beneficial cumulative land use impact.

Traffic

As the area's population grows traffic volumes would be expected to increase as well. The proposed South Salem Transit Center would provide improved transit service to the south of Salem, which would provide people with transportation options, other than the single occupancy vehicle, and potentially reduce traffic volumes and traffic congestion in the area. Therefore, the incremental impact of the project in combination with other past, present and reasonably foreseeable projects is a beneficial cumulative traffic impact.

Air Quality

The air quality analysis for the project is based on forecasted traffic volumes, which includes future population and employment growth. Therefore, the air quality analysis of long-term impacts presented in Section E of this Worksheet generally includes the cumulative impacts of air pollutant emissions from all traffic forecasted to operate within the project area and other traffic growth that would occur locally and regionally, with or without the project. As discussed in Section E of this Worksheet and Attachment 7 the project is not expected to impact air quality.

Noise

When combined with other past, present and reasonably foreseeable future urban development in the cumulative study area, the project may cumulatively contribute to minor increases in noise levels.

Environmental Justice Populations

When combined with other past, present and reasonably foreseeable actions, the project is expected to have a beneficial cumulative impact to environmental justice populations; it would provide improved transit service to businesses, residences and community services within the cumulative impact study area.

Water Quality

The project is expected to have a beneficial cumulative impact to water quality as it, along with other future development in the cumulative impact study area, will construct stormwater facilities that will provide stormwater treatment to reduce pollutant levels in stormwater runoff in compliance with the City of Salem's standards.

b) Indirect impacts, which are caused by the action but are later in time or farther removed in distance, yet are still reasonably foreseeable. Indirect impacts may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air, water and other natural systems, including ecosystems.

The South Salem Transit Center may indirectly impact land use because the improved transit service and area investment could attract commercial and residential development nearby. This growth would occur in compliance with City of Salem plans and zoning requirements.

By providing improved transit service to the area the project would be expected to help reduce future traffic volumes and level of congestion within the project area, the possible reduction of traffic in the area would be a beneficial indirect impact especially as the population in the area increases and commercial services expand. The project's potential indirect impact to help reduce future traffic volumes and levels of congestion within the project area would also indirectly benefit air quality, as it would help reduce traffic-related air pollution. Adverse indirect air quality impacts from the project would be unlikely.

The project will construct stormwater facilities that will provide stormwater treatment in compliance with City of Salem requirements. This could have a beneficial indirect impact to water quality by reducing the quantity of pollutants in area stormwater and improving the water quality of nearby water bodies, such as Waln Creek. Improvements in water quality could have a beneficial indirect impact to the health and population of species of fish in nearby waterbodies, including threatened and endangered species.

U. Property Acquisition

If property is to be acquired for the project, indicate whether acquisition will result in relocation of businesses or individuals.

Note: For acquisitions over \$500,000, FTA concurrence in the property's valuation is also required.

Attachment 12 includes a map of the portion of the Walmart parking lot that would need to be acquired for the proposed South Salem Transit Center.

The proposed South Salem Transit Center would be partially located on a 16.2 acre parcel owned by Walmart. The project will require approximately 53,861 square feet from the Walmart property for the transit center, which is approximately 8 percent of the total parcel size. The acquisition would reduce the number of parking spaces in the Walmart parking lot by approximately 144 spaces. The remaining number of parking spaces on the Walmart property would continue to conform to the City of Salem's general retail parking requirements. As shown in Attachment 12, outside of the area that would be acquired, the project would work with Walmart to reconfigure their parking lot adjacent to the transit center to best meet their needs. The transit center would not result in the relocation of the Walmart business. There is a locksmith business that is currently located in a mobile facility within the proposed transit center location in the Walmart parking lot (see Attachment 1, photo 5). During their discussions with Walmart, the District will assist with finding another suitable location for the locksmith business within the Walmart parking lot.

At this time, the acquisition cost is not anticipated to exceed \$500,000 in value.

V. Energy

If the project includes the construction or reconstruction of a building, identify potential opportunities to conserve energy which could be employed. This includes building materials and techniques used for construction; special innovative conservation features; fuel use for heating, cooling and operations; and alternative renewable energy sources.

The project includes construction of a driver relief building within the transit center. During the project's final design phase the District would evaluate ways that energy could be conserved in the construction and long-term operation of the driver relief building. Energy conservation measures that could be considered during final design include using "Energy Star" rated materials, using energy-efficient lighting and low flow plumbing fixtures, installing a "green" roof, and installing solar panels.

W. Public Involvement

Describe public outreach efforts undertaken on behalf of the project. Indicate opportunities for public meetings (e.g. board meetings, open houses, special hearings). Indicate any significant concerns expressed by agencies or the public regarding the project.

Section 2.1 of Attachment 5, the project's Environmental Critical Issues Report, provides a summary of the public outreach efforts undertaken on behalf of the project. A variety of methods to gather community input on the South Salem Transit Center has been using throughout the project's development. These methods include presentations at neighborhood association meetings, a telephone survey, an on-board survey and stakeholder interviews. Information about the project has been added to the District's website and the District's board has been briefed about the project during several public meetings. In general, both local agencies and the public have been in support of the project.

X. Mitigation Measures

Describe all measures to be taken to mitigate project impacts.

The following are mitigation measures, by element of the environment, which would be taken to minimize and mitigate for the project's impacts.

Businesses, Residents, Public Facilities

- For major utility shut offs during construction, provide advance notice and encourage utilities to schedule during low use times
- Provide notification of the construction schedule and activities for planned temporary road closures and detours, and changes in other access routes
- Maintain property access to local streets during construction

Air Quality

Division 208 of OAR 340 provides a list of reasonable precautions that should be taken to avoid, minimize and mitigate temporary adverse air quality impacts due to dust emissions during construction, including:

- Use of water or chemicals, where possible, for the control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land
- Application of asphalt, oil, water, or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts
- Full or partial enclosure of materials stockpiles in cases where application of oil, water, or chemicals are not sufficient to prevent particulate matter from becoming airborne
- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials
- Adequate containment during sandblasting or other similar operations
- When in motion, always covering open-bodied trucks transporting materials likely to become airborne
- The prompt removal from paved streets of earth or other material that does or may become airborne

Hazardous Materials

- Develop procedures for identifying, characterizing, managing, handling, storing, and disposing of contaminated soil and groundwater encountered that would cover all project improvement areas during construction activities.

- Dispose contaminated material generated during construction at a facility permitted to accept the material and follow the facility's applicable guidance.
- Develop health and safety plans, to be prepared by the construction contractor, for construction activities. The health and safety plans should be read and signed by all onsite workers accessing the site before each work day. The health and safety plan would identify potential contaminants of concern, required personal protective equipment, and emergency response procedures.

Noise and Vibration

- Establish construction hours and construction activity noise level emission criteria.
- Comply with standard specifications and all local sound control and noise level rules, regulations, and ordinances that apply to any work performed pursuant to the contract.
- Equip each internal combustion engine used on the project with a muffler of a type recommended by the manufacturer.
- Limit noisier activities involving large machinery to daytime hours, as practical.

Cultural Resources

- If archaeological resources are encountered during construction, follow the project's Inadvertent Discovery Plan and complete the Section 106 evaluation through the District's coordination with FTA, Oregon SHPO and interested tribes.

Biological Resources and Water Quality

- Prepare and implement a TESC plan to:
 - Minimize the extent of exposed soils at any given time
 - Conduct extensive soil-disturbing work in the "dry-season" (generally from June to October)
- Prepare and implement a SPCC plan to:
 - Keep spill clean-up equipment available on site
 - Conduct paving and painting in dry weather
 - Clean paint materials and equipment outside of surface waters
 - Establish concrete truck chute clean out areas
- Implement water quality BMPs to:
 - Detain and treat stormwater before it leaves the construction site

Discharge water so that it does not exceed existing conditions based on a 2-year storm event

Y. Other Federal Actions

Provide a list of other federal NEPA actions related to the proposed project or in the vicinity.

The following is a list of other federal actions related to the proposed project:

- ESA Section 7 Compliance
- Section 106 Consultation (including Tribal consultation)

Z. State and Local Policies and Ordinances

Is the project in compliance with all applicable state and local policies and ordinances?

- No, describe noncompliance:
- Yes

AA. Related Federal and State/Local Actions

- Corps of Engineers Permit (Section 10, Section 404)
- Coast Guard Permit
- Coastal Zone Management Certification
- Critical Area Ordinance Permit
- ESA and EFH Consultation
- Floodplain Development Permit
- Forest Practice Act Permit
- Hydraulic Project Approval
- Local Building or Site Development Permits
- Local Clearing and Grubbing Permit
- National Historic Preservation Act-Section 106 consultation
- National Pollutant Discharge Elimination System General Construction Permit
- Shoreline Permit
- Solid Waste Discharge Permit
- Sole Source Aquifer Consultation
- Section 4(f) (Historic or Recreational Properties; Wildlife Refuges)
- Section 6(f) (Recreational Properties)
- Section 106 (Historic Properties)
- Stormwater Site Plan (SSP)
- Temporary Erosion and Sediment Control Plan (TESC)
- Water Rights Permit
- Water Quality Certification—Section 401
- Tribal Consultation or Permits (if any, describe below)
- Other

Others (describe as applicable):

Per correspondence with City of Salem staff on September 3 and 8, 2015:

- Pre-Application Conference
- Conditional Use Permit/Class 3 Site Plan Review/Driveway Approach Permit
- Tree Permit
- Building Permit/Building Sanitary Sewer Permit/Building Storm Sewer Permit
- Excavation/Fill Permit
- Site Work Permit, including a Sidewalk Permit
- Lane Closure Permit
- Public Construction Permit
- Street Opening License
- Street Permit

Submitted By (name, title): Bryon McNatt, Project Manager Salem Area Mass Transit District	Date: October 29, 2015

Please submit two paper copies of this form, attachments, and a transmittal letter recommending a NEPA finding to the address below, **or** submit an electronic version to fta.tro10mail@dot.gov. Contact FTA at the number below if you are unsure of these procedures. Modifications are typically necessary.

Federal Transit Administration, Region 10
915 2nd Avenue, Suite 3142
Seattle, WA 98174-1002

phone: (206) 220-7954
fax: (206) 220-7959
fta.tro10mail@dot.gov

For links to further topical guidance, please visit Region 10's [Grantee Resources: Environment](#) webpage.

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~~SALEM AREA TRANSIT~~**SALEM-KEIZER TRANSIT**
GENERAL ADMINISTRATIVE MANUAL

GENERAL ADMINISTRATIVE MANUAL

LANGUAGE ASSISTANCE POLICY		Number:	104
Adopted by the Board of Directors Adopted by the SAMTD Board of Directors on 07/24/03; revised by Resolution #2017-04 adopted on 05-25-17.	Effective Date: <u>7/24/03</u> 05/25/17	Page:	1 of 35

104.01 ~~INTRODUCTION~~

~~The District Board of Directors wishes to establish a policy that will maximize access to information about Cherriots, and remove barriers to the use of Cherriot services that may result from language differences.~~

~~Policies should be consistent with Federal Transit Administration Title VI regulations that require a description of the methods used to inform minority communities of service changes relating to transit service improvements.~~

104.01 **PURPOSE**

To set clear guidelines that ensure maximum access to information about Cherriots' services and to remove barriers that may result from language differences.

104.02 **APPLICATION**

All matters related to guide how District Officers and staff provide language assistance as is required by Federal regulations contained in 49 USC §5307 (c)(1)(i), Title VI of the Civil Rights Act of 1964, 42 USC §2000d et seq, Federal Transit Laws, 49 USC 53, 49 CFR §1.51, and 49 CFR part 21. See FTA circular 4702.1B dated October 1, 2012 for details.

104.02 **GENERAL POLICY REQUIREMENTS**

A. Language Assistance Determinations

The District shall, as part of its Title VI Program update process (every three years), as part of its Title VI certification and review process, periodically review minority population percentages within Marion and Polk Counties, the District area, as well as percentage of minority ridership on Cherriots local fixed route and regional express buses.~~buses.~~

If, in the process of such reviews, a specific non-English-speaking minority population exceeds 5% or 1,000 individuals, whichever is less, of the total Marion and

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Polk County population, of the total District population, or 5% or 1,000 individuals, whichever is less, of transit ridership, staff shall prepare a report to the Board denoting this information and defining a language assistance plan that evaluates the need for translation and communication improvements, and describes a program to address that need.

1. The Federal Transit Administration’s (FTA) Safe Harbor Provision stipulates that, “if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations.”

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A biannual rider survey could be one way to inform the District of the riders’ ability to speak English.

2. At present, the Spanish
3. and Russian-speaking communities are the only populations exceeding the five percent or 1,000 individuals threshold noted above.

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SAMTD must address the Spanish and Russian populations with additional language assistance including the publication of the Title VI Notice to the Public in these languages.~~Hispanic community is the only population exceeding the 5% threshold noted in the above policy, and the policies that are defined below apply specifically to the Spanish language. These policies will be updated in the future to include other languages as necessary.~~

B. Contact List

The District shall develop and maintain Spanish and Russian language a Spanish-language contact lists, including the primary Spanish and Russian language print and airwave media and community organizations that serve Hispanic / Latino and Russian persons within ~~the District area~~Marion and Polk Counties.

C. Marketing Programs

Marketing materials that are educational or informative in nature shall be prepared and made available in ~~the Spanish language.~~ Cherriots Regional marketing materials shall be made in English, Spanish and Russian languages. Examples of this type of material include system maps, route schedules, ride guides, flyers, newsletters, and service advisories~~rider alerts.~~

Marketing materials that simply present a slogan or a graphic image, and do not have any informative content, do not as a matter of policy need to be duplicated in ~~the~~ Spanish or Russian languages. The standard to determine if a translation is

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needed should be based upon whether or not the information presented in the marketing piece is necessary to

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understand how to use the Cherriot system or to take advantage of opportunities presented by the system. Marketing pieces which would not normally be produced in ~~a~~ Spanish or Russian language versions might include some simple posters, exterior bus ads, bus passes, collateral items such as pass holders or key chains, or schedule information which is limited to times and street names.

Ads produced for cable TV marketing are not required to be prepared in Spanish or Russian- language versions. However, for programs that offer benefits to riders, cable TV spots shall contain a tag line or graphic, in Spanish and Russian, which tells where to find Spanish- and Russian language information about the program and its benefits.

If the District chooses to prepare specific Spanish or Russian- language marketing programs, nothing in these policies should be interpreted to limit the media that may be used to reach the Hispanic / Latino and Russian-speaking audiences.

D. Planning Activities

The District's planning activities include route and schedule analysis, system evaluation, ridership studies and analysis, and strategic planning. On occasion, public forums or hearings are conducted to invite input on these kinds of topics from persons in the District area. Legal notices and public hearing or forum notices on such planning meetings, and any news releases on such topics, will be distributed to Spanish and Russian-language media on the required contact list.

The District should provide ~~an~~ English-Spanish and/or English-Russian interpreters, if staff is available, for public planning meetings and forums. An interpreter shall be made available for all legally-required public hearings.

Notice will be provided to media on the District's Spanish and Russian- language contact lists of all federally- required planning activities which require public input.

E. Administrative Functions

In the conduct of the District's responsibilities, there are a number of statutory and administrative functions that require effective communications with the residents of ~~the District~~ Marion and Polk Counties. Such communications must be accessible to Spanish and Russian- speaking persons.

District regulations and public codes of conduct shall be prepared and made available in Spanish and Russian- language versions. Additionally, any legal notice

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that is distributed and is of interest to the general population shall be sent to the Spanish and Russian language media contact lists.

All District job announcements, invitations for bid, and requests for proposal shall be distributed to the Spanish and Russian -language media contacts

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Board meeting announcements and agendas will also be sent to Spanish and Russian- language media contacts. Additionally, Board agendas shall include written instructions in Spanish and Russian on meeting procedures and how to provide public comment at Board meetings and hearings.

An English-Spanish and/or English-Russian interpreter(s) should be made available at all publicly-noticed District Board meetings.

The District's web page shall include information in Spanish and Russian. A Spanish link shall include material on fares and riding regulations, how to use the Cherriots system, facilities and services available to Cherriots riders, and how to access more detailed information in ~~the~~-Spanish language and Russian.

F. Assistance in other languages

The District is aware that there are a number of languages spoken within the area, including ~~Russian and~~ other indo-European tongues, Chinese, Vietnamese, and other Asian and Pacific Island languages. An analysis of ~~the 2000 Census data indicates that the Hispanic population represents 14% of District residents, and all other non-English speaking minorities total less than 3%. the 2011-15 American Community Survey five year estimate (U.S. Census) data indicates that the Hispanic population represents 25 percent of Marion and Polk County residents. Seven percent (29,600 individuals) of the Limited English Proficient (LEP) population speaks Spanish and 0.4 percent (1,800 individuals) speak Russian. All other LEP persons total 1.1 percent of the Marion and Polk Counties population.~~

In its customer service functions, the District will retain telephonic language assistance services from a professional translating service, to provide customer service and information in multiple languages.

The District may choose to target information or marketing materials to selected minority groups in the area, in languages other than English, ~~or~~ Spanish, and Russian. ~~However, no other non-English speaking minority populations exceed the 5% threshold noted in these policies at the current time.~~

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Adopted By:

President
Board of Directors

July 24, 2003
Date

Policy:	PUBLIC PARTICIPATION PROCESS FOR PROPOSED FARE INCREASES AND/OR TRANSIT SERVICE REDUCTIONS	Number: 108
Adopted by the SAMTD Board of Directors on 10/24/2013 by Resolution #13-11; renumbered from Policy #107 to #108 by the Board on 05/22/2014 by Resolution #2014-05	Effective Date: 05/22/2014	Page 2-1 of 23

108 — INTRODUCTION

~~The Salem Area Mass Transit District Board of Directors wishes to establish Policy and Procedures for the Public Participation Process~~

108.01 APPLICATION

All matters related to guide the management of reductions in transit service and increases in fares as is required by Federal regulations contained in 49 USC §5307 (c)(1)(i).

108.02 PURPOSE

This policy should apply to the institution of proposed reduction in transit services or increase in fares.

108.03 DEFINITIONS

1. A reduction in service defined by Policy #701 "Major Service Change" of:
 - a. 15 percent or more of the number of transit route miles based on the miles of an average round-trip of the route (this includes routing changes where route miles are neither increased nor reduced (i.e., re-routes)), or;
 - b. 15 percent or more of a route's frequency of the service (defined as the average hourly frequency throughout one service day for local fixed routes and as daily round trips for regional express routes) on a daily basis for the day of the week for which a change is made or;
 - c. 15 percent in the span (hours) of a route's revenue service (defined as the time between the first served stop of the day and the last stop), on a daily basis for the day of the week for which a change is made;
2. A transit route split where either of the new routes meet any of the above thresholds when compared to the corresponding piece of the former route.

SALEM-KEIZER TRANSIT

GENERAL ADMINISTRATIVE MANUAL

3. A Major Service Change occurs whether the above thresholds are met:

- a. Within a single service proposal, or;
- b. Due to a cumulative effect of routing, frequency, or span changes over the year prior to the analysis.

~~Service Reduction: A decrease of service in a route which affects 25% or more of the number of transit route miles; 25% or more of the number of transit vehicle revenue miles, computed on a daily basis for the day of the week on which the change is made; 25% or more of the ridership on the route, computed on a daily basis for the day of the week for which the change is made, shall be considered a service reduction.~~

~~If a number of smaller reductions are made on a route during any fiscal year, and the total of the reductions meet or exceed the percentages shown above, then the reductions which result in exceeding the 25% threshold shall be subject to a public hearing.~~

~~Fare Change/Increase: A fare increase is made when there is an increase in any cash fare or in the cost of any passes, tickets, transfers, or other means by which transit riders pay for their trips.~~

108.04 GENERAL RULES

~~Public Hearing Requirements: A public hearing will be scheduled when any Major Service Change proposed that results in a decrease in service or for any proposed increase in fares. Notice must be published in a general circulation newspaper. In addition, notice will be placed in newspapers, publications, or websites that are oriented to specific groups or neighborhoods that may be affected by the proposed Major Service Change. The notice must be published at least 30 days prior to the hearing. The notice must contain a description of the proposed service reduction, and the date, time, and place of the hearing. a reduction in transit service or fare increase as defined above are proposed by the District. Notice must be published in a general circulation newspaper. In addition, notice will be placed in newspapers, publications, or internet sites that are oriented to specific groups or neighborhoods that may be affected by the proposed service reduction or fare increase. The notice must contain a description of the proposed service reduction or fare increase, and the date, time, and place of the hearing.~~

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Implementation of Changes: No transit service reduction or fare increase shall be instituted until: after a public hearing is held, after consideration to views and comments expressed in the hearing is given; and, after consideration as to the effect on ~~energy conservation, and the economic, environmental, and social impact~~ minority populations of the proposed service reduction. All changes in service meeting the definition of "Major Service Change" are subject to a Disparate Impact Analysis prior to Board approval of the service change. A Disparate Impact Analysis will be completed for all Major Service Changes and will be presented to the SAMTD Board for its consideration and included in the subsequent SAMTD Title VI Program report with a record of action taken by the Board. ~~of the proposed change in transit service or fare.~~

108.05 EXCEPTIONS

There may be exceptions to the above policies for seasonal variations in service, in emergency situations, or for experimental reduction of service or increases in fares. Any exception made by the District shall be guided by the Federal regulations contained in 49 USC §5307 (c)(1)(i).

Approved by:



Date:

5/22/14

 President
 SAMTD Board of Directors

MEMO TO: BOARD OF DIRECTORS

**FROM: LORNA ADKINS, MARKETING AND COMMUNICATIONS COORDINATOR
PATRICIA FEENY, DIRECTOR OF COMMUNICATION**

THRU: ALLAN POLLOCK, GENERAL MANAGER

SUBJECT: REQUEST FOR PROPOSALS – COMMERCIAL ADVERTISING

The District issued a formal solicitation for commercial advertising services on February 23 with a closing date of March 21. Two proposals were received by the extended deadline of April 12. Due to the deadline extension, it was not possible to bring a recommendation to the April 27 board meeting.

After an initial review and rating of the proposals, staff conducted interviews with both vendors. The District will request Best and Final Offers from both vendors. After a final scoring, the District is scheduled to present a formal recommendation at the May 25 board meeting. A verbal update will be presented at the work session.

**SALEM AREA MASS TRANSIT DISTRICT
BOARD OF DIRECTORS**

**REGULAR BOARD MEETING DATES
FY 2018**

Work Session	Board Meeting
Monday, July 10, 2017	Thursday, July 27, 2017
Monday, August 14, 2017	Thursday, August 24, 2017
Monday, September 11, 2017	Thursday, September 28, 2017
Monday, October 2 or 16 , 2017 <ul style="list-style-type: none"> • APTA Annual Meeting Oct 8-11 	Thursday, October 26, 2017
Monday, November 13, 2017	---
---	Thursday, December 14, 2017
Monday, January 8, 2018	Thursday, January 25, 2018
Monday, February 12, 2018	Thursday, February 22, 2018
Monday, March 12, 2018	Thursday, March 22, 2018
Monday, April 9, 2018	Thursday, April 26, 2018
Monday, May 14, 2018	Thursday, May 24, 2018
Monday, June 11, 2018	Thursday, June 28, 2018

Work sessions are held on the second Monday of each month at 5:30 PM in the Senator Hearing Room at Courthouse Square.

Regular board meetings are held on the fourth Thursday of each month; except in November and December because of the holidays. There is no meeting in November and the December meeting is held on the second Thursday of the month. All of the regular board meetings begin at 6:30 p.m. in the Senator Hearing Room at Courthouse Square.

Courthouse Square is located at 555 Court Street NE between High Street and Church Street. The regular board meetings can also be viewed via television on CCTV's Channel 21 or on the Internet at www.cctvsalem.org.

Upcoming Board Meeting and Work Session Agenda Items

May 8, 2017

Work Session	Board Meeting
<p>May 8, 2017 Packets due to GM office: May 1</p> <ul style="list-style-type: none"> Title VI plan discussion Review Draft FY18 Board meeting schedule Strategic planning discussion Advertising RFP Update MV Contract Extension 	<p>May 25, 2017 Packets due to GM office: May 11</p> <ul style="list-style-type: none"> <i>Tentative:</i> Approval of vehicle procurement Consent: CNG Tanks Contract Consent: MV Contract Extension Adoption of Title VI Update Approval of Advertising RFP Approval of local election results (C) Adopt FY2018 BOD meeting schedule (C) Q3 finance, trip choice, performance report
<p>June 12, 2017 Packets due to GM office: June 5</p> <ul style="list-style-type: none"> Review core network policy Review service planning policy Strategic planning discussion 	<p>June 22, 2017 Packets due to GM office: June 8</p> <ul style="list-style-type: none"> Hearing/Res#2017-XX adopt FY18 budget Adopt core network policy Approval of FY2018 United Way Donation (C)
<p>July 10, 2017 Packets due to GM office: July X</p> <ul style="list-style-type: none"> 	<p>July 27, 2017 Packets due to GM office: July X</p> <ul style="list-style-type: none"> Oath of Office for newly elected Board (2017) Election of Officers/Oath of Office (2017) Approval of security services contract Accept preliminary fiscal year end financials
<p>August 14, 2017 Packets due to GM office: August X</p> <ul style="list-style-type: none"> Board Committee assignments (2017) Board ethics training 	<p>August 24, 2017 Packets due to GM office: August X</p> <ul style="list-style-type: none"> Accept annual security report Appoint Board Committee assignments (2017) Fiscal year end trip choice report
<p>September 11, 2017 Packets due to GM office: September X</p> <ul style="list-style-type: none"> 	<p>September 28, 2017 Packets due to GM office: September X</p> <ul style="list-style-type: none"> Approval of annual SDIS board check list Fiscal year end performance report GM performance evaluation (Executive Session)

<p>October X, 2017 Packets due to GM office: October X</p> <ul style="list-style-type: none"> Proposed FY2019 budget calendar 	<p>October X, 2017 Packets due to GM office: October X</p> <ul style="list-style-type: none"> Approval of FY2019 budget calendar (C)
<p>November X, 2017 Packets due to GM office: November X</p> <ul style="list-style-type: none"> Proposed appointments to the STFAC 	<p>November - No Board meeting</p>
<p>December - No work session</p>	<p>December X, 2017 Packets due to GM office: December X</p> <ul style="list-style-type: none"> Appointments to the STFAC Q1 finance, trip choice, perf report
<p>January X, 2018 Packets due to GM office: January X</p> <ul style="list-style-type: none"> Present draft 2018 legislative agenda 	<p>January X, 2018 Packets due to GM office: January X</p> <ul style="list-style-type: none"> Adoption of 2018 legislative agenda
<p>February X, 2018 Packets due to GM office: February X</p> <ul style="list-style-type: none"> 	<p>February X, 2018 Packets due to GM office: February X</p> <ul style="list-style-type: none"> Q2 finance, trip choice, performance report
<p>March X, 2018 Packets due to GM office: March X</p> <ul style="list-style-type: none"> 	<p>March X, 2018 Packets due to GM office: March X</p> <ul style="list-style-type: none">
<p>April X, 2018 Packets due to GM office: April X</p> <ul style="list-style-type: none"> 	<p>April X, 2018 Packets due to GM office: April X</p> <ul style="list-style-type: none">
<p>To Be Scheduled</p> <ul style="list-style-type: none"> Contract for Capital Project Manager Stops & Shelters Construction/Design Contract COOP (July/Aug) Transportation Services Contract 	<p>To Be Scheduled</p> <ul style="list-style-type: none">



Salem Area Mass Transit District
BOARD OF DIRECTORS MEETING

Thursday, May 25, 2017 at 6:30 PM

Courthouse Square – Senator Hearing Room
555 Court Street NE, Salem, Oregon 97301

DRAFT
AGENDA

- A. CALL TO ORDER & NOTE OF ATTENDANCE**
- B. PLEDGE OF ALLEGIANCE** – Secretary John Hammill
- C. ANNOUNCEMENTS & CHANGES TO AGENDA**
- D. PRESENTATION**
- E. PUBLIC COMMENT**
Each person’s comments are limited to three (3) minutes.
- F. CONSENT CALENDAR**
 - 1. Approval of Minutes [Action]**
 - a. Minutes of the April 26, 2017 Regular Board Meeting
 - b. Minutes of the April 24, 2017 Special Board Meeting
 - 2. Routine Business**
 - a. Adopt the FY2018 Board Meeting Schedule
 - b. MV Contract Extension
 - c. Approval of the CNG Tanks Contract
- G. ITEMS DEFERRED FROM THE CONSENT CALENDAR**
- H. ACTION ITEMS**
 - 1. Accept May 2017 Local Election Results
 - 2. Approval of Vehicle Procurement TENTATIVE
 - 3. Adoption of Title VI Updates
 - 4. Advertising RFP
- I. INFORMATION ITEMS**
- J. REPORTS**
 - 1. Finance Report – Third Quarter

2. Trip Choice Report – Third Quarter
3. Performance Report – Third Quarter
4. Board Member Committee Reports *[Receive and File]*
 - a. Minutes of the April 10, 2017 Board Work Session

K. BOARD & MANAGEMENT ISSUES

1. General Manager
2. Board President
3. Board of Directors

L. ADJOURNMENT

This is an open, public meeting at an accessible location. Special accommodations are available, upon request, for persons with disabilities. Services may be requested for sign language interpretation or languages other than English. To request accommodations or services, please call 503-588-2424 at least two business days prior to the meeting.

Next Regular Board Meeting Date: Thursday, June 22, 2017

Regular Board meetings are televised and can be viewed on CCTV's website: www.cctvsalem.org.
Go to www.cherriots.org/board for an electronic copy of the Board's agenda packet.

Cherriots Administration Office ~ 555 Court Street NE, Suite 5230 ~ Salem, OR 97301
Phone (503) 588-2424 ~ Board of Directors Email Address: Board@cherriots.org