



Title VI Program

*For the Federal Transit Administration
And Washington State Department of Transportation*

August 06, 2018 – July 31, 2021

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Section 1. Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color and national origin in programs and activities receiving Federal financial assistance.

Skagit Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B.

If you believe you have been subjected to discrimination under Title VI, you may file a complaint. Procedures for doing so are detailed in Section 2.

Section 2. Title VI Complaint Procedures

Filing a Complaint

You may file a signed, written complaint up to one hundred and eighty (180) days from the date the complainant became aware of the incident. A formal complaint must include the following information:

- Your name, mailing address, and how to contact you (i.e., telephone number, email address, etc.);
- The facts and circumstances surrounding the discrimination including how, when, where and why you believe you were discriminated against;
- The location, names and contact information of any witnesses; and
- Any other information that you deem significant.

For detailed complaint procedures, please see Appendix C. Appendix A is Skagit Transit's complaint form and instructions. The form is also available online at:

http://www.skagittransit.org/assets/1/7/Civil_Rights_Complaint_form1.pdf

Complaint may be filed in writing with Skagit Transit's Title VI Coordinator at the following address:

Skagit Transit
Title VI Coordinator / Service Development Planner
600 County Shop Lane
Burlington, WA 98233

In cases where the complainant is unable or incapable of providing a written statement, a verbal complaint may be made. Contact the Title VI Coordinator (Service Development Planner) at 360-757-8801, hearing impaired please dial 711, to make a verbal complaint. The Title VI Coordinator will interview the complainant and, if necessary, assist the person in converting verbal complaints to writing. All complaints must be signed by the complainant or his/her/representative. Interpretive services are available to those with Limited English Proficiency.

Skagit Transit encourages all complainants to certify all mail that is sent through the U.S. Postal Service. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 180 days from the date the complainant became aware of the incident.

Complaint Investigation

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by Skagit Transit will be investigated by the Title VI Coordinator or designee of the Title VI Director (Executive Director) or Manager (Manager of Finance and Administration). Skagit Transit shall also provide appropriate assistance to complainants, including those persons with

disabilities, or who are limited in their ability to communicate in English. Additionally, Skagit Transit shall make every effort to address all complaints in an expeditious and thorough manner.

In instances where additional information is needed for investigation of the complaint, Skagit Transit will make such a request for additional information by registered mail within 10 days of receipt of the complaint. The complainant or contractor must submit the requested information within 60 working days from the date of the original request.

Once sufficient information for investigating the complaint is received, an investigative report will be sent to the Executive Director within 60 days of receipt of information. The Director shall make a final determination within 10 days of the investigative report. Notice of the Executive Director's determination will be mailed to the complainant.

Notification of Outcome

Notice of the Executive Director's determination will be mailed to the complainant. Notice shall include information regarding appeal rights of complainant and instructions for initiating such an appeal. If the complainant is dissatisfied with the determination and/or resolution set forth, the same complaint may be submitted to the Federal Transit Administration (FTA) for investigation. For more information, contact the Federal Transit Administration, Office of Civil Rights, 915 Second Avenue, Suite 3142, Seattle, WA 98174-1002, 1-206-220-7954 (Hearing Impaired please dial 711).

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

Washington State Department of Transportation
Public Transportation Division
Attn: Title VI Coordinator
PO Box 47387
Olympia, WA 98504-7387

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590

United States Department of Justice
Civil Rights Division
Coordination and Review Section – NWB
950 Pennsylvania Avenue NW
Washington DC, 20530

Section 3. Public Notification of Title VI Compliance

Appendix B is Skagit Transit's posted notice to the public that the agency complies with Title VI. This notice includes instructions to the public on how to file a discrimination complaint and is posted at the following locations:

- Skagit Transit Website
- Rider Guide
- Maintenance, Operations, and Administrative Office (MOA)
- Skagit Station
- Park and Ride Facilities and Skagit Station

The Title VI Coordinator is responsible for ensuring Title VI compliance notices are posted. The public notice is translation into Spanish consistent with LEP Guidance.

Section 4. Title VI Investigations, Complaints, and Lawsuits

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

Since Skagit Transit's last Title VI Program submittal in March 2015, the agency has received one (1) Title VI complaint, no lawsuits have been filed, and no investigations have been launched. The complaint and the agency response are listed below.

A LEP rider contacted Skagit Transit via a social worker to file a complaint about two separate incidents on Skagit Transit's fixed route service. The complaint was investigated, but no video recording could verify either incident. Customer service expectations were explained to all staff regarding the type of communication that should occur between staff and our riders.

Section 5. Public Participation Plan

Skagit Transit has policy and procedures that address public involvement and notification for plans, programs, service reductions, fare increases, and any other instance where it is necessary or desirable to obtain public participation. Procedures were revised in February 2016 and are included as Appendix E. These procedures address Title VI and LEP requirements and guide staff on notification, public meetings, consultation, and documents and records retention.

Since the last Title VI Program update, Skagit Transit has conducted the following outreach activities:

- Travel training serving individuals throughout the city
- Berry Dairy Days Parade June 2018
- Outreach in support of the 2018 Strategic Plan
- Outreach for Transit Development Plan updates (Annually)
- Participation in community events such as tabling at project homeless connect, at farmers markets, at food banks, and at other community events
- Public Meetings and Open Houses for Service Enhancements (2017)

Section 6. LIMITED ENGLISH PROFICIENCY (LEP)

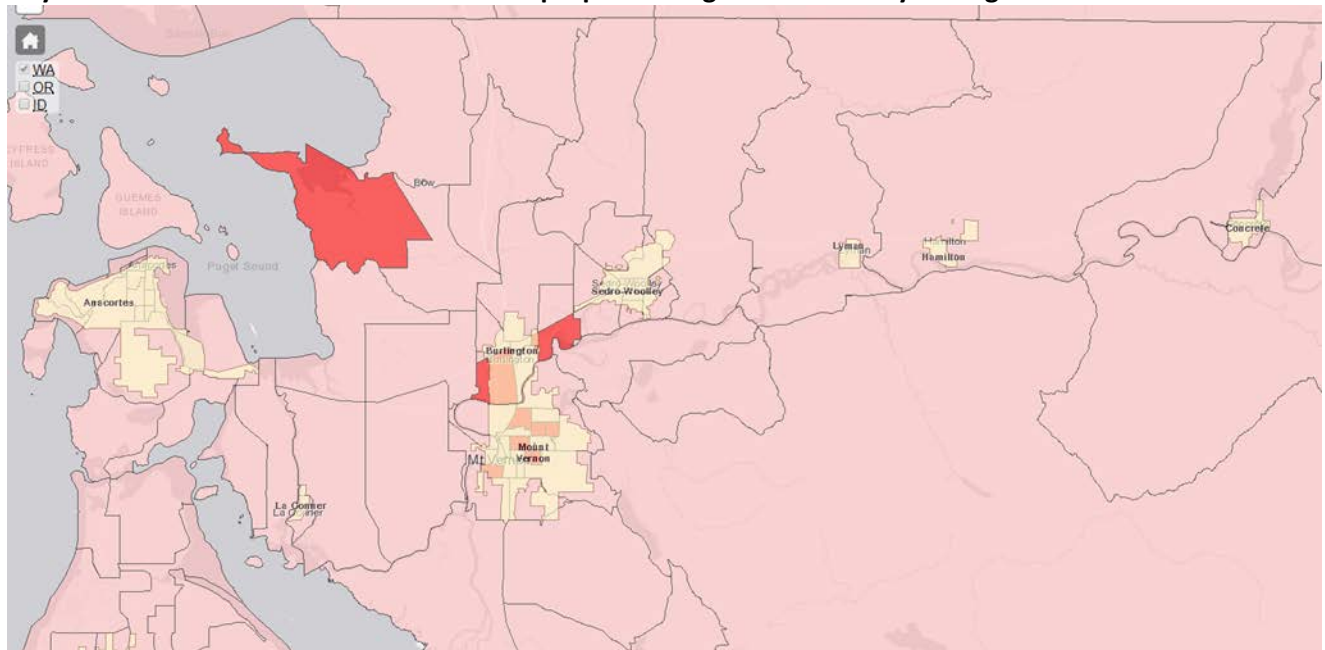
LEP Four Factor Analysis

As a recipient of federal financial assistance, Skagit Transit has an obligation to reduce language barriers that can preclude meaningful access by Limited English Proficiency (LEP) persons to important benefits, rights, programs, information, and services. The starting point is an individualized four factor analysis prescribed by FTA.

FACTOR 1: The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population;

Spanish is the only language meeting the LEP minimum of 1,000 speakers or 5% of the population, whichever is less. According to 2011-2015 American Community Survey 5-Year Estimates (Table B16001), there were an estimated 7,245 LEP persons in the Skagit Transit PTBA. This estimate is nearly 6.5% of the total population of the PTBA for persons 5 years of age and older. Spanish is by far the most prevalent language spoken at home, other than English, among those with LEP. Over 75% of persons with LEP speak Spanish at their home according to these data. All other languages spoken at home among persons with LEP, other than Spanish, had small sample sizes with large margins of error. Due to the small sample size for all these languages spoken, these data are considered unreliable. However, the three other most prevalent languages spoken at home by individuals with LEP are Russian, Tagalog and Other/Unspecified. There are nine census tracts in the PTBA where the proportion of LEP persons is higher than the service-area average of 6.5%. These tracts are primarily in the Burlington and Mount Vernon areas and are mapped below.

City Boundaries and Census Tracts with LEP proportion higher than county average in RED



Concentrations of LEP Individuals

Census Tracts where the Proportion of LEP Persons Exceeds the Proportion of LEP Persons in the Service Areas as a Whole (6.5%)

Tract	(Spanish) Speaks English < Very Well	(Russian) Speaks English < Very Well	(Tagalog) Speaks English < Very Well	(Other/ Unspecified) Speaks English < Very Well	(All Other Languages) Speaks English < Very Well	Total
9508	137	0	0	232	24	393
9516	367	0	0	0	5	372
9518	501	60	11	42	67	681
9522	586	62	24	0	165	837
9523.01	1111	0	0	45	49	1205
9523.02	691	0	134	0	53	878
9524.01	442	1	0	0	0	443
9524.02	733	265	0	0	67	1065
9525	185	0	0	0	13	198
Source: U.S. Census Bureau, 2011-2015 5-Year American Community Survey, B16001						

Tract	Total Population	(Spanish) Speaks English < Very Well	(Russian) Speaks English < Very Well	(Tagalog) Speaks English < Very Well	(Other/ Unspecified) Speaks English < Very Well	(All Other Languages) Speaks English < Very Well	Total Speaks English < "Very Well"
9402	2161	5	0	4	0	10	19
9403	4599	27	0	2	0	35	64
9404	6584	32	0	20	4	26	82
9405	2362	44	0	2	0	16	62
9406	1444	2	0	0	0	7	9
9407	1475	2	0	0	0	13	15
9408	2771	2	0	0	0	11	13
9501	765	4	0	0	0	0	4
9508	5507	137	0	0	232	24	393
9509	4192	0	0	0	0	90	90
9510	2540	34	0	0	0	5	39
9511	4732	4	0	0	0	19	23
9512	2902	24	0	0	0	18	42
9513	1641	16	0	0	0	0	16
9514	3768	74	0	0	0	8	82
9515	8992	14	0	0	0	42	56
9516	4193	367	0	0	0	5	372
9517	3442	136	23	0	0	0	159
9518	4577	501	60	11	42	67	681
9519	3481	26	0	0	0	26	52
9521	3288	112	0	0	0	1	113
9522	4165	586	62	24	0	165	837
9523.01	4764	1111	0	0	45	49	1205
9523.02	8304	691	0	134	0	53	878
9524.01	2634	442	1	0	0	0	443
9524.02	7116	733	265	0	0	67	1065
9525	2747	185	0	0	0	13	198
9526	3464	125	0	0	0	12	137
9527	3263	46	0	0	0	12	68
Total	111,873	5,482	411	197	323	832	7,245
% of Total		4.90%	0.37%	0.18%	0.29%	0.74%	6.48%
Source: U.S. Census Bureau, 2011-2015 5-Year American Community Survey, B16001							

FACTOR 2: The frequency with which LEP individuals come in contact with the program;

LEP individuals come into contact with Skagit Transit's services in the following ways:

- Contact with transit vehicle operators;
- Contact with transit station customer service representative;
- Calls to Skagit Transit's customer service telephone line;
- Visits to Skagit Transit's Maintenance, Administration and Operations base;
- Visiting the website;
- Attendance at community meetings or public hearings;
- Contact with Skagit Transit's ADA complementary paratransit system (including applying for eligibility, making reservations, and communicating with drivers).

In July 2018, a survey of front line staff was completed. Fifty-six (56) surveys were completed with results as follows:

July 2018 Employee Survey		
1. Survey respondents:	Responses	%
Driver	44	79%
Dispatch, CSR, Receptionist, Ops Support	12	21%
Total	56	100%
2. Do you speak Spanish and feel comfortable communicating with Spanish speaking customers?		
	Responses	%
No, I do not speak Spanish well enough to communicate with Spanish speaking customers.	50	89%
Yes, I speak Spanish and feel comfortable communicating with the public in Spanish.	6	11%
3. How often do you have contact with customers or potential customers that are unable to, or have limited ability to, communicate in English?		
	Responses	%
Daily	8	14%
Several times per month	29	52%
Less than once per month	19	34%
4. Are you aware that Skagit Transit has access to a language line for interpretation assistance?		
	Responses	%
Yes	26	46%
No	30	54%
5. If you have used the language line for interpretation services, how convenient and helpful do you feel the service is for customers with Limited English Proficiency?		
	Responses	%
Not convenient or helpful	2	4%
Moderately convenient and helpful	8	14%

Very convenient and helpful	5	9%
Never Used It	41	73%
6. In your opinion, does language present a barrier to those with Limited English Proficiency from using Skagit Transit services?		
	Responses	%
Yes, frequently	8	14%
Yes, sometimes	14	25%
Yes, rarely	16	29%
No	17	30%

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

Public transit is a key means of achieving mobility for many LEP persons. The fixed route and paratransit services Skagit Transit provides are very important to the lives of our customers, especially those with limited mobility options. For those with limited mobility choices, Skagit Transit may be the only option for traveling to work, school, appointments, and social reasons.

FACTOR 4: The resources available to Skagit Transit and cost.

Costs associated with the provision of resources to LEP individuals for the period March 3rd 2015 to July 31st 2018 is summarized below:

LEP Expenditures March 3 rd 2015 to July 31 st 2018	
Interpretive Services	\$762
Translation Services	\$346
Printing Costs (Estimate)*	\$6,402
Public Notice Publication (Spanish Newspaper)	\$2,678
Total	\$10,188

*- 15% of Printing Costs to cover the inclusion of Spanish in all printed materials

Language Assistance Implementation Plan

The Skagit Transit PTBA has an estimated 7,245 LEP individuals for whom Spanish is by far the most common language spoken at home. 5,482 of the 7,245 (75.7%) LEP individuals speak Spanish. In large part, LEP individuals are concentrated within the PTBA in parts of Mount Vernon and Burlington. A survey of front line staff showed that employees regularly come into contact with individuals with LEP, with 66% reporting that they come into contact with someone with LEP either daily or several times per month. Over half of survey respondents reported that language can "sometimes" be a barrier to accessing Skagit Transit's services.

Skagit Transit provides the following language assistance measures:

1. The Skagit Transit website incorporates Google Translate and can be viewed in Spanish, as well as many other languages.
2. Essential information including, but not limited to, Rider Guides, fare payment instructions, Public Notices, and Rider Alerts are published in English and Spanish and often as multi-lingual documents. Other essential documents, such as the 6-

Year Transit Development Plan, include information on how to request a translated version of the document.

3. Professional document translation services are used for document translations.
4. Professional telephone interpreter services are used for LEP customer calls.
5. Professional translator hired to attend meetings when it is known or anticipated that LEP persons will be in attendance.
6. Incoming telephone call instructions in Spanish.
7. Public notices are published in Spanish in the *El Mundo* Newspaper.
8. Skagit Transit made available the “Basic Spanish for Transit Employees” pocket guides for front line staff. This guide is published by the Colorado Mountain College.
9. Skagit Transit made available to all front line staff and on all coaches a one-page document with Spanish translations of common transit phrases and agency-specific information (see Appendix D).
10. Staff members meet with the Latino Advisory Committee of Skagit County on a monthly basis to conduct outreach to those agencies serving the LEP population in the county.

Responding to LEP Callers

Customer Service Representatives, Dispatchers, Schedulers, or any other Skagit Transit staff that regularly takes calls from the public should understand how to access the language interpreter services available to Skagit Transit and how to respond to an LEP caller. Language interpreting services are available 24 hours a day. Instructions for accessing interpreting services are outlined below. Additionally, written, step-by-step instructions for using the language interpretation lines are posted in the Dispatcher and Scheduler work area.

When someone with LEP calls, please say “Please hold for interpreter”. In Spanish, this translates to: “espera de un intérprete” pronounced esPERei a un inTEIRpretei.

How to Use Language Interpreting Services

- | | |
|---------|---|
| STEP 1. | Call 1-888-338-7394 |
| STEP 2. | Enter Account Number 8896, followed by # sign |
| STEP 3. | <u>Select 1</u> to be connected directly to your Spanish interpreter, or
<u>Select 2</u> to be connected directly to your Russian Interpreter, or
<u>Select 3</u> to be connected directly to your Vietnamese interpreter, or
<u>Select 4</u> to be connected directly to your Somali Interpreter, or
<u>Select 9</u> for all other languages |

Responding to Written Communications from LEP Persons

Office personnel may occasionally receive written communications from persons with LEP. Any staff person receiving a written communication in a language that they cannot read fluently, will have the document forwarded to a translator who can translate the document into English.

Translation assistance will also be sought as needed to ensure that any written or verbal communication back to the LEP individual is in their native language.

How to Respond to In-Person Contact with LEP Persons

Operators and Customer Service Representatives who regularly interact with the public should understand how to respond to an LEP customer. Operators should make their best attempt to communicate with the LEP customer using the verbal and non-verbal communication. Often Operators are assisted in communicating by using the Rider Guide (a bi-lingual document with maps) or other language resources provided by Skagit Transit to communicate with LEP customers, this includes the Basic Spanish for Transit Employees pocket guide or the one-page document with Spanish translations of common transit phrases and agency specific information (Appendix D). As appropriate, the Operator may need to ask the LEP customer to call into Dispatch to be connected with language interpreter services. At the Operator's discretion, they may ask if another passenger on the bus is able to help communicate. Staff working in an office environment can also make use of phone based interpretive services as needed.

Ensuring the Competency of Interpreters and Translation Services

Skagit Transit relies on professional interpreter and translation services.

Written translations are performed for Skagit Transit by the Language Exchange in Burlington Washington. Every Language Exchange translator has a B.A. or B.S. degree or equivalent and is accredited by the American Translator Association or has similar certification. To ensure accuracy and consistency of style and usage, all Language Exchange translations go through a careful review process before being released to Skagit Transit.

Skagit Transit uses CTS Language Link for over the phone interpreter services. CTS is on the Washington State Government Contract. The procurement which was led by the State of New Mexico evaluated providers partly on the qualifications of their interpreters. CTS regularly monitors calls to ensure interpreter quality and adherence with the companies Code of Ethics.

Providing Notice to LEP Persons of Free Language Assistance

Skagit Transit communicates with the public through its website, one-on-one at Customer Service at Skagit Station, over the phone, through notices on buses and at transfer stops, and through its Rider Guide. Skagit Transit does not currently market its services through Public Service Announcements on the radio, television, or newspapers. Skagit Transit rarely participates in tabling events and only very occasionally participates in group presentations.

Skagit Transit takes, or plans to take, the following steps to notify LEP Persons of language assistance:

- Use of an automated telephone voice mail menu system that includes an option for Spanish speakers.
- Posting of notices in Spanish announcing free language assistance availability at Skagit Station and major transfer stops.
- Publishing of notices in local newspapers in languages other than English.
- The most widely distributed and used communication document Skagit Transit has is its Rider Guide. New Rider Guides are typically published every September or more frequently as needed. This document is a bi-lingual document (English and Spanish) however, it does not contain a statement notifying the public of the free language services

Skagit Transit offers. Consistent with FTA's guidance in the LEP Handbook, this document will be revised so that the next edition includes such a statement.

- Consistent with FTA's guidance in the LEP Handbook, the Skagit Transit website will be updated to include a statement about the availability of free language assistance.

Monitoring, Evaluating, and Updating the Language Assistance Implementation Plan

At a minimum, Skagit Transit reevaluates its LEP plan every three years in conjunction with the Title VI Program update. However, changes in service area or demographics may require more frequent reevaluation. Skagit Transit conducts internal monitoring to determine whether language assistance measures and staff training programs are working. Internal monitoring includes employee surveys that take place prior to the revision of Skagit Transit's Title VI plan. The employee survey conducted as part of this update pointed to a lack of understanding amongst front-line employees about the language assistance measures provided by Skagit Transit that could be corrected with further training. It also pointed to a need for additional resources that could assist English only speakers communicate with Spanish speaking customers. Other means of internally monitoring are understanding how often over-the-phone language interpretation services are used. Currently these services are needed rarely with only \$762 of interpretation services being used during the last three years. High use of this service would point to changes in demographics or ridership that should be addressed in the Language Assistance Implementation Plan.

Training Employees to Provide Timely and Reasonable Language Assistance to LEP Customers

All front line Skagit Transit employees undergo training upon hire where they are instructed on Skagit Transit's responsibility to provide language assistance and the different language assistance measures Skagit Transit uses.

Section 7. Analysis of Construction Projects

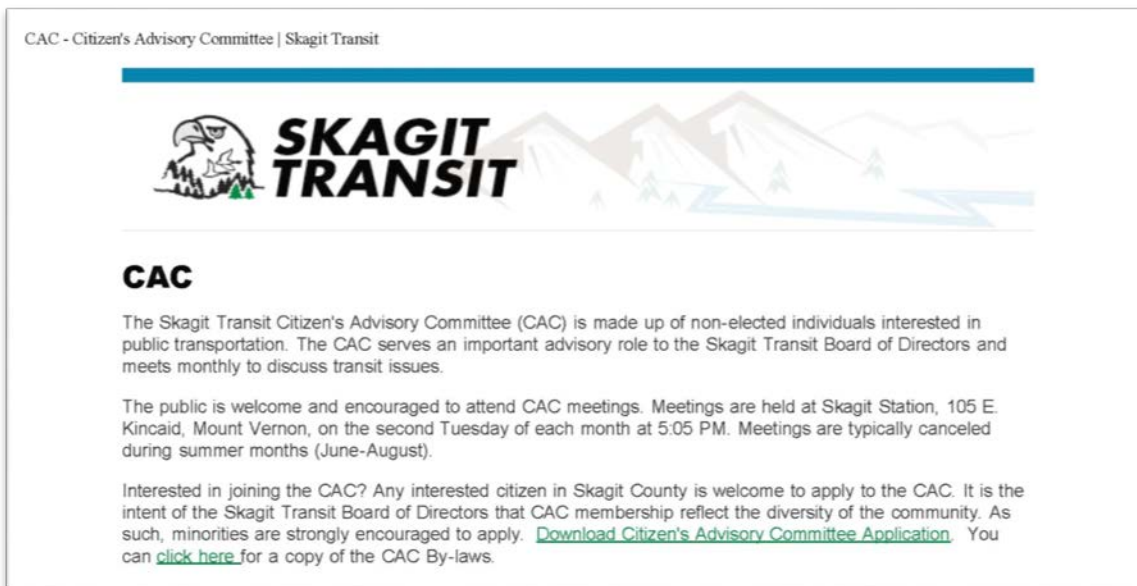
Over the last three years, Skagit Transit has engaged in the early stages of constructing a new Maintenance, Operations, and Administrative facility. This has been done in phases including 2 completed phases; the Feasibility Study phase and the Property Acquisition Phase. The project is currently in the Design and Engineering Phase. The construction phase will begin in 2019 if funding is available. A Title VI Equity Analysis was completed in the Feasibility Phase and showed no adverse impacts with the site selected. The full report is included in Appendix F.

Section 8. Membership of Non-Elected Committees

Skagit Transit values the viewpoints of minority, LEP and low income participants on the Citizen Advisory Committee (CAC). Membership of these non-elected committee members is approved by the Skagit Transit Board of Directors to supplement the elected decision making bodies that represent the transportation interests of our service area.

CAC Bylaws require staff to widely publicize vacancies on the CAC to maintain a group with a minimum membership of eight and maximum of sixteen. The CAC has never had a maximum number of members and active recruitment for new members has taken place. CAC Bylaws ask that Staff widely publicize vacancies so that any interested citizen may apply “with every effort made to reflect diversity of the community”. CAC bylaws further state that the Board of Directors of Skagit Transit will select CAC members “to achieve a balanced representation demographically and geographically, or as many segments of the community as possible.” Skagit Transit does have information on the CAC webpage asking any interested citizen to apply but specifically encouraging minorities to apply (see below). Skagit Transit also has recruitment flyers on the fixed route vehicles.

CAC Webpage:



Race*						
	American Indian and Alaska Native	Asian	Black or African American	Hawaiian and Other Pacific Islander	White	Some Other Race
Population	2.7%	2.3%	1.1%	0.0%	90.5%	3.1%
CAC (%)	0%	0%	0%	0%	89%	11%
CAC (Number)	0	0	0	0	8	1
NOTE: Three (3) CAC members declined to participate in survey on race and ethnicity.						

*- Data from US Census 2017 Population Estimate

Ethnicity*		
	Hispanic or Latino	Not Hispanic or Latino
Population	18.3%	81.7%
CAC (%)	0%	100%
CAC (Number)	0	9
<i>NOTE: Three (3) CAC members declined to participate in the survey on race and ethnicity.</i>		

*- Data from US Census 2017 Population Estimate

Section 9. Fixed Route Service Standards

Skagit Transit has developed quantitative standards for fixed route operations to better understand and track the performance of our service to minority, low income and LEP populations. These standards apply to the fixed route portion of our services and are used to demonstrate that our fixed route services are provided to the public regardless of race, color, or national origin.

FTA does not require Skagit Transit to monitor or report on service standards. Only those transit providers that operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more in population are required to monitor and report on service standards.

Vehicle Load

Vehicle load is expressed as the ratio of passengers on a bus to the total number of seats on the vehicle. For example, a bus with 35 seats that is carrying 35 passengers has a vehicle load of 1. If that same bus were carrying 40 passengers, the vehicle load would be 1.14 meaning all seats were filled and there were approximately 5 standees.

Currently, Skagit Transit does not have onboard technology that allows for the collection of vehicle load data. Currently, operators call in to Dispatch to make supervisors aware that a particular run has standees. A second source of information is surveyors that collect information every three years on per passenger miles traveled that is reported to NTD.

MAXIMUM VEHICLE LOAD (Passengers on Board / # of Seats)	
	Guideline
Local Fixed Routes (Short) Short distance, low-speed routes with shorter travel times. Typically, short routes are those under 10 miles, primarily operating on roadways with speed limits of 35mph or less, and with scheduled travel times of 30 minutes or less. Examples include Routes 205 and 208. Short local routes generally travel within city limits.	Should not exceed 1.25 on any trip
Rural and Intercity Fixed Route (Long Trips) Longer distance, higher-speed routes. These trips often operate partially on State or Federal Highways, and often with travel times that may exceed 30 minutes. Examples include Flex Route 8, Route 40X, and Route 300. Long trips generally connect cities, towns and other population centers including rural population centers.	Load factor should not exceed 1.00 on any trip
County Connector Routes Routes 80X and 90X	Load factor should not exceed 1.00 on any trip

The table below shows the minimum number of standees a run would experience given the load standards shown above.

MINIMUM NUMBER OF STANDEES		
	Load 1.00	Load 1.25
26' Bus with 17 Seats	0	4
29' Bus with 30 Seats	0	8
30' Bus with 25 Seats	0	6
35' Bus with 31 Seats	0	8
35' Bus with 32 Seats	0	8
35' Bus with 35 Seats	0	9
40' Bus with 43 Seats	0	11
40' Bus with 36 Seats	0	9

Vehicle Headways

Headways are the time intervals in minutes between scheduled trips. Short headways are attractive to passengers and generally 30-minute headways or better are highly desirable. However, available resources and passenger demand may be insufficient to operate on 30 minute headways or better. Short headways are especially difficult on longer routes serving low density areas.

VEHICLE HEADWAYS STANDARDS (Time in Minutes Between Scheduled Bus Departures)	
	GUIDELINE
Local Fixed Routes (Short) Short distance, low-speed routes with shorter travel times. Typically, short routes are those under 10 miles, primarily operating on roadways with speed limits of 35mph or less, and with scheduled travel times of 30 minutes or less per trip. Examples include Routes 205 and 208. Short local routes generally travel within city limits.	≤ 30 minutes high-ridership routes ≤ 60 minutes low-ridership routes
Rural and Intercity Fixed Route (Long Trips) Longer distance, higher-speed routes. These trips often operate partially on State or Federal Highways, and often with travel times that may exceed 30 minutes. Examples include Flex Route 8, Route 40X, and Route 300. Long trips generally connect cities, towns and other population centers including rural population centers.	≤ 60 minutes high-ridership routes ≤ 180 minutes low-ridership and/or very long-distance routes
County Connector Routes Routes 80X and 90X	≤ 60 minutes

On-Time Performance

Skagit Transit has defined on-time performance to be a percentage of runs, system-wide, that arrive within 5 minutes of the posted arrival time. Five minutes before or after a scheduled arrival time is Skagit Transit's on-time window.

ON-TIME PERFORMANCE STANDARD (% of Runs System Wide that Arrive within 5 Minutes of the Posted Arrival Time)	
	% Minimum
Peak	90%
Off Peak	95%

Service Availability

Skagit Transit measures service availability by maximum distance between bus stops for local routes operating within city or town limits. No standard has been developed for commuter routes 80X, 90X, and 40X because long periods of closed door service are characteristic of commuter service. Impediments to locating stops within 0.25 miles includes problems such as pushback from property owners and businesses and the inability to find a safe bus stop location.

SERVICE MEASURE	
	Distance Between Bus Stops
Local Fixed Routes when in Operation within City or Town Limits	0.5 Mile Adequate 0.25 Mile Optimal

Section 10. Fixed Route Policy Standards

FTA requires that all providers of fixed route public transportation develop qualitative policies for siting transit amenities and for assigning vehicles.

Transit Amenities

It is Skagit Transit's policy to site transit amenities including seating, shelters, information, and waste receptacles as follows:

DISTRIBUTION OF TRANSIT AMENITIES	
Skagit Station	Seating, route and schedule information, and trash receptacles.
Major Transfer Locations (Park and Rides and Popular Transfer Stops)	Seating, route and schedule information, and trash receptacles.
Local Route Bus Stops	Schedule information is provided on all bus pole stops. Seating, shelters, and trash receptacles are relatively rare at local route bus stops. Decisions on siting these amenities is based on available resources, an observed need, passenger or community requests, and property owner permission.

Vehicle Assignment

It is Skagit Transit policy to assign vehicles based on maximum passenger load as well as other operational requirements of a route that may require smaller buses including tight turns and narrow roads or bridges.

Appendix A – Instructions and Form for Filing a Title VI Complaint

CIVIL RIGHTS

DISCRIMINATION COMPLAINT FORM

Any person, individually or as a member of any specific class of persons, including legally protected classes as required by law, who believe that they have been subjected to discrimination, by Skagit Transit or one of its contractors, on the basis of race, color, creed, sex, age, disability, national origin or other protected classes as required by law, may file a complaint with Skagit Transit. A complaint must be filed within 180 days after the date of the alleged discrimination. Additional Discrimination Complaint Forms may be obtained at no cost to the complainant by calling (360) 757-8801 or TTY/TDD (360) 757-1938 or can be downloaded off our web-site at www.SkagitTransit.org.

Intimidation or retaliation of any kind against the complainant is prohibited by law.

The complainant has the right to file formal complaints with other State or Federal agencies or to seek private counsel for any complaint alleging discrimination.

Skagit Transit will make every effort to obtain an early resolution of complaints. Informal mediation meetings(s) between the affected parties and Skagit Transit may be used for resolution of the complaint.

Instructions / Procedures:

- 1) Complainant or his/her representative completes the attached form. Keep this instruction guide for your records.
- 2) If you are unable or incapable of providing a written statement, a verbal complaint may be made. Please contact Skagit Transit for assistance and note that a signature will still be required.
- 3) State, as fully as possible, the facts and circumstances surrounding the alleged discrimination.
- 4) The Complainant, or his/her representative, must sign the form.
- 5) Mail or deliver the complaint form to: Skagit Transit - Civil Rights Coordinator - 600 County Shop Lane - Burlington, WA 98233-9772.
- 6) Within five days of receipt of the complaint, the Skagit Transit Executive Director will notify you and any other parties to the complaint, by registered letter, whether Skagit Transit has jurisdiction and if the complaint has "investigative merit". In the event that the decision is not to investigate the complaint, your notification shall specifically state the reason for the decision and whether the complaint has been referred to another State or Federal agency that has jurisdiction. In the event the complaint is to be investigated, the notification shall inform all parties that Skagit Transit will conduct an investigation and request any additional information needed to assist the investigator.
- 7) If your complaint is deemed to have investigative merit, you may be asked to supply additional information Skagit Transit within 60 working days from the date of original request. Failure of the complainant to submit requested information within 60 days may be considered good cause for a determination of no investigative merit.
- 8) A final determination by Skagit Transit's Executive Director will be sent to the complainant, by registered mail, within 90 days of receipt of the complaint.

SKAGIT TRANSIT CIVIL RIGHTS COMPLAINT FORM - Page 1 of 2

Section I

Name: _____

Address: _____

Phone: (home) _____ (work/other) _____

E-mail address: _____

Accessible Format Requirements?

Large Print _____ Audio Tape _____ TDD _____ Other _____

What is your relationship to SKAGIT TRANSIT? (passenger, employment applicant, employee, bidder on a SKAGIT TRANSIT contract, etc.) _____

Section II

Are you filing this complaint on your own behalf?

Yes _____ No _____ (If you answered "Yes" please skip to Section III).

If you answered "No", please supply the name and relationship of the person for whom you are complaining: _____

Please explain why you are complaining for a third party? _____

Please confirm that you have obtained the permission of the aggrieved party to file on their behalf:

Yes _____ No _____

Section III

Have you ever filed a complaint with Skagit Transit before? Yes _____ No _____

If no, please skip to Section IV.

If yes, please provide the date of complaint or any other information you remember:

(This information is for administrative purposes only)

Section IV

Have you filed this current complaint with any other agency? Yes _____ No _____

If yes, please list the agency _____

Have you filed a lawsuit regarding this current complaint? Yes _____ No _____

If yes, please attach a copy of the complaint, case number or other information. *(This information is helpful for administrative purposes; however, if litigation is pending regarding the same issues, we defer to the decision of the court)*

SKAGIT TRANSIT CIVIL RIGHTS COMPLAINT FORM - Page 2 of 2

Section V

Is this complaint against Skagit Transit or one of Skagit Transit's contractors?

Skagit Transit _____ Contractor _____

If complaint is against Skagit Transit, please skip to Section VI.

If against one of Skagit Transit's contractors, please list, if known, the name of the Contractor:

May we release a copy of your complaint to the Contractor? Yes _____ No _____

May we release your identity to the Contractor? Yes _____ No _____

Section VI

Please describe your complaint below (attach additional sheets if necessary). You should include specific details as they apply to your complaint such as names, dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of your allegations. Attach any documentation that is relevant to this complaint.

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There are approximately 20 lines visible. The paper appears to be a standard notebook page or a sheet of stationery.

Please sign here: _____ **Date** _____

If you are a representative complaining for a third party, please sign above then print your name:

(Note – Skagit Transit cannot accept your complaint without a signature)

For office use only: Date Received: _____ **/ Received By:** _____

LAS GARANTÍAS CONSTITUCIONALES **LA FORMA DE QUEJA DE DISCRIMINACIÓN**



El cualquier ciudadano, individualmente o como un miembro de cualquier clase específica de personas, adicionar legalmente protegió clases conforme exige la ley, quienes creen que han sido supeditadas a discriminación, por Skagit Transit o uno de su Contractors, con base en la carrera, el color, el credo, el sexo, la edad, la incapacidad, el origen nacional u otras clases protegidas conforme exige la ley, pueden archivar una queja con Skagit Transit. Una queja debe ser archivada dentro de 180 días después de la fecha de la supuesta discriminación. El adicional Discrimination Complaint Forma puede ser obtenido gratis para el demandante llamando a (360) 757-1938 757-8801 o TTY/TDD (360) o puede ser del que se hizo un download fuera de nuestro sitio Web en www.SkagitTransit.org.

La intimidación o la venganza de cualquier tipo en contra del demandante es prohibida por ley.

El demandante tiene el derecho de archivar denuncias formales con otras agencias Estatales o Federales o para buscar consejo privado para cualquier queja alegando discriminación.

Skagit Transit hará lo imposible por obtener una resolución tempranera de quejas. Las reuniones informales (s) de abogamiento entre las fiestas afectadas y Skagit Transit pueden servir para resolución de la queja.

Las Instrucciones /procedimientos:

- 1) El demandante o el de él / su representante completa la formalidad atribuida. Guarde a este guía de instrucción para sus registros.
- 2) Si usted es incapaz o incapaz con tal que una declaración real, entonces una queja verbal puede estar hecha. Por favor el contacto Skagit Transit para la asistencia y la nota que una firma todavía será requerida.
- 3) La condición, como completamente como el hecho posibles, y las condiciones rodeando la supuesta discriminación.
- 4) El Complainant o el de él / su representante debe firmar la forma.
- 5) Envíe por correo o entregue la forma de queja para:
Skagit Transit - Civil Rights Coordinator - 600 County Shop Lane - Burlington, WA 98233-9772
- 6) Dentro de cinco días de recibo de la queja, el Director Ejecutivo Skagit Transit notificará a usted y cualquier partidos contrarios para la queja, por carta certificada, ya sea Skagit Transit tiene jurisdicción y si la queja tiene "mérito investigador". En caso que la decisión no es investigar la queja, su notificación específicamente declarará la razón para la decisión y ya sea la queja ha sido referida a otra agencia Estatal o Federal que tiene jurisdicción. En caso de que la queja es ser investigado, la notificación informará todas las fiestas que Skagit Transit dirigirá una investigación y demandará cualquier información adicional necesitada para ayudar al investigador.
- 7) Se estima que si su queja tiene mérito investigador, entonces usted puede recibir instrucciones de suministrar información adicional para ayudar a la investigación. La información demandada debe ser enviada a Skagit Transit dentro de 60 días de trabajo de la fecha de petición original. El fracaso del demandante para proponer demandó información dentro 60 días puede ser considerada motivo suficiente para una determinación de ningún mérito investigador.
- 8) Una resolución definitiva por el Director Ejecutivo de Skagit Transit se enviará al demandante, por correo certificado, dentro de 90 días de recibo de la queja.

La FORMA de QUEJA de GARANTÍAS CONSTITUCIONALES

SKAGIT TRANSIT

Capítulo 1

El nombre: _____

La dirección: _____

El teléfono: (La casa) _____ (el trabajo /otro)

La dirección de correo electrónico: _____

¿Los Requisitos Accesibles Del Formato?

Grande impresion _____ Cinta Audia _____ TDD _____ Otro _____

¿Qué debe su relación Skagit Transit? (El pasajero, el solicitante de empleo, el empleado, el postor en un contrato Skagit Transit, etc.)

El capítulo II

¿Está usted archivando esta queja en su patrocinio?

Sí _____ No _____ (Si usted contestó que sí por favor pásese a Section III).

Si usted no contestó a, entonces por favor suministre el nombre y la relación de la persona para quien usted se queja: _____

¿Por favor explica que usted se queja para un tercero? _____

Por favor confirme que usted ha obtenido el permiso de la parte agraviada para archivar en su patrocinio: Sí _____ No _____

El capítulo III

Usted alguna vez ha presentado una queja con Skagit Transit antes?

Sí _____ No _____

Si no, por favor pásese para Section IV.

Si sí, por favor provea la fecha de queja o cualquier otra información, entonces usted recuerda: _____

(Esta información es para propósitos administrativos sólo)

El capítulo IV

¿Ha archivado usted esta queja coetánea con cualquier otra agencia?

Sí _____ No _____

Si sí, por favor liste a la agencia

Usted ha entablado un proceso legal referente a esta queja coetánea?

Sí _____ No _____

Si sí, por favor pegue una copia de la queja, entonces el número de caso u otra información. (Esta información es de ayuda para los propósitos administrativos. Sin embargo, si la litigación está pendiente referente a los mismos asuntos, entonces diferimos para la decisión de la corte)

El capítulo V

¿Esta queja va en contra de Skagit Transit o uno de los contractors de Skagit Transit?

Skagit Transit _____ Contractor _____

Si la queja va en contra de Skagit Transit, por favor p ase a Section VI.

Si en contra de uno del Contractors de Skagit Transit, por favor escree, entonces estando conocido, el nombre del contractor:

¿Podemos soltar una copia de su queja para el contractor? Sí _____ No _____

Podemos lanzar al mercado su identidad para el contractor? Sí _____ No _____

El capítulo VI

Por favor describa su queja debajo (pegue hojas adicionales si es necesario). Usted debería incluir detalles específicos como se apliquen a su queja como los nombres, las fechas, las veces, los números de la ruta, los testigos, y cualquier otra información que nos ayudaría a nuestra investigación de sus alegaciones. Pegue cualquier documentación esto es pertinente para esta queja.

[illegible]

Por favor firme aquí: _____ **La fecha** _____

Si usted es un representante quejándose para un tercero, por favor firme arriba luego escriba en letras de imprenta su nombre: _____

(Nota - Skagit Transit no puede aceptar su queja sin una firma)

For office use only: Date Received: _____ **/ Received By:** _____

Appendix B – Copy of Title VI Notice to the Public



PUBLIC NOTICE OF NON-DISCRIMINATION POLICY

Skagit Transit hereby gives public notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964 and related amendments, statutes and regulations in all federally funded programs and activities. Title VI requires that no person in the United States of America shall, on the grounds of race, color, creed, sex, age or national origin, and other protected classes as required by law, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which Skagit Transit has received Federal financial assistance.

Any person, individually or as a member of any specific class of persons (including legally protected classes as required by law), who believes that they have been subjected to discrimination on the basis of race, color, creed, sex, age or national origin may file a complaint with Skagit Transit. A complaint must be filed within 180 days after the date of the alleged discrimination. Discrimination Complaint Forms may be obtained at no cost to the complainant by calling (360) 757-8801 or hearing impaired dial 711.

AVISO AL PÚBLICO SOBRE LA POLÍTICA DE SKAGIT TRANSIT DE NO DISCRIMINAR

Skagit Transit por medio de la presente da aviso al público de su política para asegurar que se cumplan las leyes del Título VI De La Ley De Derechos Civiles De 1964, las enmiendas relacionadas, los estatutos y las regulaciones de todos los programas y de las actividades financiadas con fondos federales. El Título VI dice que ninguna persona en los Estados Unidos de América, por razón de su raza, su color, su sexo o su nacionalidad de origen, no se le puede excluir de participar o de negarle los beneficios o de ser sujeto a la discriminación bajo ningún programa o actividad en la cual Skagit Transit reciba ayuda financiera federal.

Cualquier persona, individualmente o como miembro de algún grupo específico de personas, quien cree que ha sido sometido a la discriminación debido a su raza, su color, su sexo, o su nación de origen, pueden poner una reclamación con Skagit Transit. La reclamación debe hacerse dentro de los 180 días del incidente supuestamente ocurrido. Las formas para hacer una reclamación del Título VI de discriminación pueden ser obtenidas sin ningún costo a usted llamando por teléfono al (360) 757-8801 o al línea para personas con problemas auditivos 711.

Appendix C – Civil Rights Complaint Procedures



TITLE VI COMPLAINTS OF DISCRIMINATION PROCEDURE

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Civil Rights Restoration Act of 1987, and the Americans with Disabilities Act of 1990, relating to any program or activity administered by Skagit Transit as to consultants, and contractors. Intimidation or retaliation of any kind is prohibited by law. The procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the Title VI Coordinator may be utilized for resolution.

Complaint Procedure

1. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited by nondiscrimination requirements may file a complaint with Skagit Transit. A formal complaint must be filed within one hundred and eighty (180) days of the alleged occurrence.
2. In cases where the complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The Title VI Coordinator will interview the complainant and if necessary assist the person in converting verbal complaints to writing. All complaints must, however, be signed by the complainant or his/her representative.
3. Complaints shall state, as fully as possible, the facts and circumstances surrounding the alleged discrimination.
4. Skagit Transit will provide the complainant or his/her representative and any contractor (respondent) with a written acknowledgement that Skagit Transit has received the complaint within five (5) working days of receipt.
5. A copy of the complaint will be forwarded to Skagit Transit's legal counsel for review.
6. The Executive Director will assign an Investigator to the complaint (this may be the Title VI Coordinator or other designated staff).
7. The Investigator will determine if the complaint has investigative merit:
 - a. It was received within 180 days of the alleged occurrence.
 - b. It is does not appear to be frivolous or trivial.
 - c. It involves Skagit Transit or Skagit Transit contractors and not another entity.
 - d. A complaint against a contractor involves a Skagit Transit Federally funded contract.
8. The complainant and contractor, or other party to the complaint, will be notified of the status of the complaint within ten (10) days of receipt of the complaint, by registered mail that:
 - a. The complaint will not be investigated and the reasons why the complaint does not have investigative merit.
 - b. The complaint will be investigated and a request for additional information needed to assist the Investigator.

9. The complainant or contractor must submit the requested information within sixty (60) working days from the date of the original request. Failure of the complainant to submit additional information within the designated timeframe may be considered good cause for a determination of no investigative merit. Failure of the contractor to submit additional information within the designated timeframe may be considered good cause for a determination of noncompliance under the contract.
10. The internal Investigator and/or contractor must, within fifteen (15) working days, supply the Executive Director with status report of their investigation and/or resolution of the complaint.
11. Within sixty (60) working days of the receipt of the complaint, the Investigator will prepare a written report for the Executive Director that shall include:
 - a. A narrative description of the incident, including persons or entities involved.
 - b. A statement of the issues raised by the complainant and the respondent's reply to each of the allegations.
 - c. Citations of relevant federal, State and local laws, Skagit Transit policy, etc.
 - d. Description of the investigation, including list of the persons contacted and summary of the interviews conducted.
 - e. A statement of the Investigator's finding and recommendations for disposition.
12. The investigative report and findings of the complaint will be sent to legal counsel for review.
13. The Executive Director shall, based on the information before him or her and in consult with legal counsel, make a determination on the disposition of the complaint. Determination shall be made within 10 days from Executive Director's receipt of the investigator's report. Examples of disposition are as follows:
 - a. Complainant is found to have been discriminated against. Skagit Transit or Contractor is therefore in noncompliance with Title VI regulations. Reasons for the determination will be listed. Remedial actions that Skagit Transit or the Contractor must take will be listed (see also Section 10).
 - b. Complaint is found to be without merit. Reasons why will be listed.
14. Notice of the Executive Director's determination will be mailed to the complainant and contractor. Notice shall include information regarding appeal rights of complainant and instructions for initiating such an appeal. Example of a notice of appeal follows:
 - a. Skagit Transit will only reconsider this determination, if new facts, not previously considered, come to light.
 - b. If the complainant is dissatisfied with the determination and/or resolution set forth by the same complaint may be submitted to the Urban Mass Transportation Administration (UTMA) for investigation. For more information, please contact the Federal Transit Administration, Office of Civil Rights, 915 Second Avenue, Suite 3142 – Seattle, WA 98174-1002 / (206) 220-7954.
15. A copy of the complaint and Skagit Transit's investigation report/letter of finding and Final Remedial Action Plan will be issued to the FTA within ninety (90) days of the receipt of the complaint.
16. After receiving the FTA's comments, out briefings may be scheduled with all relevant parties to the complaint.
17. A summary of the complaint and its resolution must be included in the annual report to the FTA.

Appendix D - Copy of the Basic Spanish for Transit Employees Handout for Front Line Staff

Basic Spanish for Transit Employees



It may be difficult for a non-bilingual operator to provide assistance to someone with limited English. If you are having trouble communicating, ask if another passenger could serve as a translator **or** provide the passenger with the customer service number **360-757-4433** so they can be connected with our interpretive services.

DESTINATIONS		
Are you going to . . .	¿Va para . . .?	<i>bah pah-rah . . .</i>
I'm going to . . .	Yo voy a . . .	<i>yoh boh-ee-ah . . .</i>
the mall	el centro comercial	<i>ehl sehn-troh coh-mehr-see-ahl</i>
the hospital	el hospital	<i>ehl oh-spee-tahl</i>
the grocery store	el supermercado	<i>ehl soo-pehr-mehr-kah-doh</i>
the drugstore	a la farmacia	<i>ah lah fahr-mah-see-ah</i>
the post office	el correo	<i>ehl koh-rreh-oh</i>
the senior center	el centro para la tercera edad	<i>ehl sehn-troh pah-rah lah tehr-seh-rah eh-dahd</i>
the library	la biblioteca	<i>lah bi-blee-ah-te-kah</i>
the bank	el banco	<i>ehl bang-koh</i>
KEY PARATRANSIT PHRASES		
To the left?	¿A la izquierda?	<i>ah lah ees-kee-her-dah</i>
To the right?	¿A la derecha?	<i>ah lah deh-reh-chah</i>
Is this the building?	¿Este es el edificio?	<i>ehs-teh ehs ehl eh-dee-fee-see-oh</i>
FARES AND PASSES		
The fare is ____.	La tarifa es ____.	<i>lah tah-ree-fah ehs ____</i>
One dollar please.	Un dólar, por favor.	<i>ohn doh-lahr pohr-fah-bohr</i>
Two dollars please.	Dos dólares, por favor.	<i>dohs doh-lahr-ehs pohr-fah-bohr</i>
Which pass do you want to buy?	¿Qué pase desea comprar?	<i>keh pah-she deh-seh-ah kohm-prahr</i>
This pass is not valid.	Este pase no es válido.	<i>ehs-teh pah-seh noh ehs bah-lee-doh</i>
This pass is valid for 1 day.	Este pase es válido por un día.	<i>ehs-teh pah-seh ehs bah-lee-doh pohr ohn dee-ah</i>
This pass is valid for 31 day.	Este pase es válido por treinta y un días.	<i>ehs-teh pah-seh ehs bah-lee-doh pohr treh-eeen-tah ee oo-n dee-ahs</i>
TIME		
The bus leaves at ____.	El autobús sale a ____.	<i>ehl ow-toh-boos sah-leh ah lahs ____.</i>
The bus arrives at ____.	El autobús llega a las ____.	<i>ehl ow-toh-boos yeh-gah ah lahs ____.</i>
SAFETY		
Fold strollers please.	Doble los carreaola por favor.	<i>doh-bleh lohs care-ee-oh-la pohr-fah-bohr</i>
I am going to put your chair on the lift now.	Voy a poner su silla en el elevador ahora.	<i>boh-ee ah poh-nehr soo see-yah ehn ehl eh-leh-vah-dohr ah-oh-rah</i>
I am going to tie your chair down.	Voy a asegurarle su silla.	<i>boh-ee ah ah-seh-goo-rahr-leh soo see-yah</i>
Please stop.	Por favor compórtese.	<i>pohr-fah-bohr kohm-pohr-teh-seh</i>
That behavior is not acceptable on the bus.	No puede hacer eso en el autobús.	<i>Noh pweh-deh ah-sehr en-soh ehn ehl aw-toh-boos</i>
Please get off the bus.	Bajarse del autobús por favor.	<i>bah-hahr-sey dehl aw-toh-boos pohr-fah-bohr</i>

Where are you going?

¿A dónde va?

Ah *dohn-deh bah*



Appendix E – Public Participation Procedures

SKAGIT TRANSIT PUBLIC PARTICIPATION PROCEDURES

I. CONTENTS:

- I. Contents
 - II. Use of Procedures
 - III. Duties and Assignment
 - IV. Limited English Proficiency (LEP)
 - V. Plans with Public Participation Process Requirements
 - 1. Coordinated Human Service Transportation Plan
 - 2. Transit Development Plan (TDP)
 - 3. Unified Planning Work Program (UPWP)
 - 4. Program of Projects (POP)
 - 5. Transportation Improvement Program (TIP)
 - VI. Fare and Service Changes
 - VII. Consideration of Comments
 - VIII. Public Meetings – General Standards
 - IX. Periodic Review of Public Participation Process
 - X. Documentation and Records Retention
 - XI. Definitions and Acronyms
 - XII. Authorities and Citations
- Attachment “A” - Public Process Review Form

II. USE OF PROCEDURES:

These procedures will be utilized:

- A. When a public process is a necessary part of any plan or other requirement;
- B. When a public process is desired to inform the public and seek involvement for plans and actions;
- C. Prior to conducting certain federal grant funded capital, operating or planning projects;
- D. Prior to initiating a major reduction in service;
- E. Prior to increasing the existing fare structure.

The procedures will comply with federal requirements for receipt of grant funding, state planning requirements and any other authority requiring public participation. Updates will be made to this document, as needed, when the underlying federal or state requirements are changed or the periodic review calls for corrective action.

III. DUTIES AND ASSIGNMENT

The day-to-day duties outlined in this procedure will rest with the Skagit Transit Planner with oversight by the Manager of Finance and Administration and final authority, on matters of corrective action or policy revision, with the Executive Director.

IV. LIMITED ENGLISH PROFICIENCY

As a recipient of federal financial assistance, Skagit Transit has an obligation to reduce language barriers that can preclude meaningful access by Limited English Proficiency (LEP) persons to important benefits, rights, programs, information, and services.

Spanish is the only language meeting the LEP minimum of 1,000 speakers or 5% of the population, whichever is less. According to 2009-2013 American Community Survey 5-Year Estimates (Table B16001), there were an estimated 4,747 LEP persons in the Skagit Transit PTBA. This estimate is nearly 5% of the total population of the PTBA for persons 5 years of age and older. Spanish is by far the most prevalent language spoken at home, other than English, among those with LEP. Over 74% of persons with LEP speak Spanish at their home according to these data. All other languages spoken at home among persons with LEP, other than Spanish, had small sample sizes with large margins of error. Due to the small sample size for all these languages spoken, these data are considered unreliable. However, the three other most prevalent languages spoken at home by individuals with LEP are Russian, Tagalog and Chinese. See Skagit Transit's Title VI Program for more information.

Skagit Transit provides the following language assistance measures:

1. The Skagit Transit website incorporates Google Translate and can be viewed in Spanish, as well as many other languages.
2. Essential information including, but not limited to, Rider Guides, fare payment instructions, Public Notices, and Rider Alerts are published in English and Spanish and often as multi-lingual documents. Other essential documents, such as the 6-Year Transit Development Plan, include information on how to request a translated version of the document.
3. Professional document translation services are used for document translations.
4. Professional telephone interpreter services are used for LEP customer calls.
5. Professional translator hired to attend meetings when it is known or anticipated that LEP persons will be in attendance.
6. Incoming telephone call instructions in Spanish.
7. Public notices are published in Spanish in the *El Mundo* Newspaper.
8. Skagit Transit made available the "Basic Spanish for Transit Employees" pocket guides for front line staff. This guide is published by the Colorado Mountain College.
9. Skagit Transit made available to all front line staff and on all coaches a one-page document with Spanish translations of common transit phrases and agency-specific information (see Appendix D).

V. PLANS WITH PUBLIC PARTICIPATION PROCESS REQUIREMENTS

1. Coordinated Human Service Transportation Plan

- A. Requirement: Projects funded with Section 5310, 5316, or 5317 funds are to be included in or derived from a locally developed, coordinated public transit human service transportation plan, coordinated by the MPO. The coordinated plan should be developed through a process that includes representatives of seniors, individuals with disabilities, representatives of public, private, and non-profit transportation and human services providers, and participation by the public.
 - B. Public Process: Skagit Transit will generally rely on the MPO process to satisfy requirements specific to the HSTP.
2. Transit Development Plan (TDP)
- A. Requirement: Each year, Skagit Transit will prepare a six-year Transit Development Plan consistent with RCW 35.58.2795, due to the Washington State Department of Transportation no later than September 1st.
 - B. Public Process: Staff shall initiate a 30-day public comment period on a draft TDP prior to Board approval. This shall be accomplished by making the draft TDP available to the public for their review and comment on the Skagit Transit website, at Skagit Station, and the MOA base. Upon request, staff will also email or mail a copy of the draft TDP to anyone requesting the document. Notification, in both English and Spanish, that the draft is available for review will be posted on buses, Skagit Station, the MOA, Park and Ride Facilities, the *Skagit Valley Herald* (English version), and the *El Mundo* (Spanish version). Included in the notification will be the location, date, and time of an open public meeting where any interested person can make verbal public comments. The TDP will be approved by the Board in an open public meeting following the normal public notification for Board meetings. A consultative process will result with public comments received and considered according to the procedures in section VI. The final, approved TDP will be posted to the Skagit Transit website.
3. Unified Planning Work Program (UPWP)
- A. Requirement: The FTA and WSDOT require the MPO to submit this regional plan which contains a transit portion. All STP, CMAQ and other federally funded planning projects proposed by Skagit Transit must be selected from the approved UPWP.
 - B. Public Process: The MPO will follow the public process as required by the regulations and Skagit Transit will generally rely on the MPO process to satisfy requirements specific to the UPWP. Federal grant funded projects appearing on the UPWP may also be included in the POP, TDP and TIP public processes, as appropriate.
4. Program of Projects (POP)
- A. Requirement:
 - 1. The Federal Transit Administration (FTA) requires that projects funded by Section 5307 and other federal programs be selected from a proposed POP that was developed with public participation.

2. The proposed POP will be based on information from the TDP and other planning documents and tools as well as successful grant applications. The projects will be developed in coordination with other federally assisted transportation services and in consultation with interested parties, including private transportation providers. The POP will include all of Skagit Transit's federally funded capital, operating and planning projects for one or more calendar year(s).
3. The FTA has published detailed procedures and requirements to ensure that the proposed POP was made available to the public for review and that comments are duly considered.

B. Public Process:

1. Skagit Transit will rely on the public participation process of the Skagit Metropolitan Planning Organization (MPO) Transportation Improvement Program (TIP) to satisfy the public requirements for the Program of Projects (POP).

5. Transportation Improvement Program (TIP)

A. Requirement: WSDOT requires that all transportation projects for the MPO area be included in one TIP and submitted to the State for approval and inclusion on the Statewide Transportation Improvement Program (STIP). FTA requires that any grant funded project be included on the STIP to be eligible for funding. This process promotes coordination and reduces duplication of services. Skagit Transit must submit approved and finalized POP projects and other substantial projects to the MPO each year for placement on the TIP.

B. Public Process:

- ✓ The MPO will follow a Federal compliant Public Participation Process for all projects submitted for inclusion on the TIP including amendments to the approved TIP. Once this process is complete and all TIP projects are approved by the MPO Policy Board, the TIP will be submitted to the State for placement on the STIP.
- ✓ Comments received during the TIP approval process, which are related to Skagit Transit POP projects, may be considered directly by Skagit Transit utilizing the procedure in section VI. Changes made to the previously approved, final POP as a result of the TIP public process will be considered to have met the POP public participation requirements and the amended POP will become the final POP.

VI. FARE INCREASES AND SERVICE CHANGES

- A. Requirement: The FTA requires that grantees have a written process for soliciting and considering public comment prior to raising fares or implementing major service reductions. This procedure is not required for non-major service reductions, service increases, fare decreases, the implementation of special fares or the establishment of fares on entirely new service.
- B. Definitions:
- ✓ Raising Fares is defined as any increase in the actual dollar amount of the normal-basic fare structure on existing routes. It does not include a reduction in the actual dollar amount of fares; changes in the use of transfers or eligibility for reduced fares; implementing a fare on an entirely new route or type of service; implementing special fare agreements.
 - ✓ Major Reduction of Service is defined as a change that impacts and reduces 25% or more of the service hours of an existing route or service. It does not include changes that impact and reduce less than 25% of the service hours of a route; minor changes in route direction, area of coverage, bus stops, time points or other route changes.
- C. Civil Rights – Title VI:
- ✓ Any proposed changes to existing route or fare structure will be assessed for the affect on minority and special needs communities through the Civil Rights Program Monitoring. Proposed changes will be examined to determine if they might cause any adverse impacts on minority or special needs communities compared to the general ridership population.
 - ✓ Changes which may not require public involvement in this procedure (do not impact 25% or more of the service hours of a route) must still be assessed. Such changes may include; changes in a route's area of coverage, time points, bus stops, amenities, bus transfer procedures or reduced fare eligibility. This assessment may determine that a separate public involvement process is necessary.
 - ✓ All notices about proposed fare increases and major reductions in service shall be in both English and Spanish.
 - ✓ For this procedure, an assessment will determine if such communities are affected; whether there is a significant LEP population affected; where the public notice should be published to reach such communities and into what languages it should be translated, other than English and Spanish.
- D. Public Process:
1. Public Notice document will include:
 - ✓ Information on each proposed increase in fares or service reduction and the proposed date of implementation.
 - ✓ How interested citizens can obtain and/or view additional information and submit comments.

- ✓ A statement that a public comment period on the changes has commenced and will continue for thirty (30) days.
 - ✓ A statement about the location, date and time to provide verbal comments at a public meeting. Typically, regularly scheduled Board meetings will be publicized as opportunities for the public to make verbal comments on a proposed service change or fare increase unless a separate public meeting has been organized for the proposed change.
 - ✓ That the proposed increase in fares or service reduction will be approved by the Board of Directors at location, date and time of meeting. In no even shall the Board of Directors vote on a matter before the end of the required public comment period.
2. Publication of Notice:
- ✓ Posted to locations identified below at least thirty (30) days prior to effective date of fare increase or service reduction.
 - ✓ Published at least once in Skagit Transit's Official Newspaper of Record (currently the *Skagit Valley Herald*).
 - ✓ Translated into Spanish and published at least once in a locally distributed Spanish language newspaper (currently *El Mundo*).
 - ✓ Translated into other languages and/or distributed directly to affected minority or other special needs communities as determined by the current Title VI Program and the Title VI Assessment completed for the service reduction or fare increase.
 - ✓ Sent via email, fax or mail to affected representatives of transportation employees (as appropriate).
 - ✓ Posted at Skagit Transit's park and rides, Skagit Station, MOA, and other locations as appropriate.
 - ✓ Posted on buses as "Rider Alerts" (as appropriate).
 - ✓ Posted on website.
 - ✓ Other notifications will be made directly to segments of the community particularly affected by the fare increase or service reduction by any means appropriate.
3. Opportunity to Provide Comments at an Open Public Meeting
- ✓ Notifications of service reductions and fare increases shall advertise the location, date and time of an open public meeting where the public can make verbal comments. Typically this shall be at a regularly scheduled Board of Directors meeting unless a specific meeting is planned for the proposed change.
4. Consideration of Comments
- ✓ The procedures outlined in section VI will be followed for comments received in response to the notice of service reduction or fare increase.

VII. CONSIDERATION OF COMMENTS

Skagit Transit seeks to engage the public in an ongoing dialog regarding our operations and plans. Public participation will be encouraged and while Skagit Transit is not required to change plans and projects based on public comment, due consideration will be given to comments made by the public.

Process for consideration of comments:

- 1) Any comments received will be recorded noting the commenter's name, subject, date and time received.
- 2) Comments will be read and considered by the appropriate staff person or working group.
- 3) The staff person or working group will create written, internal responses to comments or categories of comments. These responses may include reasons why a suggestion cannot be followed; steps that may be taken to incorporate the suggestion into future or current plans; or steps to be taken to mitigate a problem or issue raised.
- 4) The internal responses created in step 3 above will be forwarded to Skagit Transit's Executive Director or his/her designee as a set of recommendations. The Director or Director's designee will determine if the working group's recommendation will be followed, if another determination will be made, or if the matter will be brought before the Board of Director's for further review. Unless matters are sent to the Board of Directors for further review, the Executive Director will make all final decisions regarding Skagit Transit's response to received comments.
- 5) Action taken after the Executive Director's final decision will be made on a case-by-case basis as appropriate. Action may include: providing written responses to those that submitted comments; revising plans and projects including the program of projects and completing any additional public participation as appropriate (e.g. the republication of notices); approval of the proposed program or plan as originally published.
- 6) Documentation: See Section IX.

VIII. PUBLIC MEETINGS – General Standards:

Skagit Transit is likely to hold many different types of public meetings for various reasons in our ongoing effort to inform the public and seek their involvement in our operations and plans. At a minimum, the following basic procedures will be followed for all public meetings:

A. Public Notice:

- ✓ A Public Notice will be developed that includes the purpose, location, date and time of the meeting and other information as mandated by a particular public process requirement for plans or programs.
- ✓ Notice will be distributed at least seven (7) days prior to the meeting date or as mandated by a particular public process requirement for plans or programs.
- ✓ As appropriate, notices will be sent to a media distribution list; posted at central locations; posted on the Skagit Transit website; posted on buses as “Rider Alerts”; and posted as mandated by a particular public process requirement for plans or programs such as the requirement for the placement of a legal ad for the Program of Projects (POP).
- ✓ The impact of the public meeting’s subject on minority or other special needs communities will be assessed through a Title VI Assessment. Further publication or translation of the notice may be necessary to reach these communities.

B. Public Meeting Venue:

- ✓ Where a meeting is organized specifically for a service change or fare increase, the location should be centrally location and accessible for transit users, persons with special needs, and the general public impacted by the proposal. Changes that are area specific should be held in or near the impacted community. Changes that impact all system users such as fare increases should be held at a venue that is easily accessible by transit such as the meeting room at Skagit Station in Mount Vernon or other centrally located venue on a well-served transit route.

C. Conduct of Meetings:

- ✓ At least one representative of Skagit Transit will be present.
- ✓ Members of the public will be given an opportunity to ask questions and make comments. Time limitations on public comment maybe established, as necessary, to ensure that all members of the public have an opportunity to make comments within the scheduled meeting time-frame.
- ✓ Written minutes of the meeting will be produced, either formal or informal depending upon the meeting’s purpose and requirements for plans and programs.
- ✓ Meeting minutes will be posted on the Skagit Transit website and made available to the public upon request.

D. Documentation: See section IX-B.

IX. PERIODIC REVIEW OF PUBLIC PARTICIPATION PROCESS

- A. Requirement: The FTA and WSDOT require that a periodic review be made of the effectiveness of the public involvement process. This review will seek to ensure that the process provides full and open access to all citizens; that the desired level of public input is being received; and that the required participants are receiving information prior to decisions being made and plans finalized.
- B. Reviews: Reviewing the effectiveness of the Public Participation Process will involve both an ongoing commitment by Skagit Transit to seek constructive public involvement and a formal, written review every three years as part of the Title VI Program update.

Ongoing Review:

- ✓ Required public involvement: prior to beginning each public process, the requirements of the process will be reviewed to ensure that all necessary steps are being performed such as adequate language in public notices; publication of notices; public hearing and consideration of comments. During the documentation phase, assurances will be made that these steps were actually taken, as required.
- ✓ Desired public involvement: prior to beginning each public process and as an ongoing Civil Rights requirement, proposed plans, projects, programs and changes will be assessed for their impact on particular segments of the community. This process will not only look for impacts to minority and special needs persons but also simply to determine which segments of the community will be impacted or interested enough to become involved in the planning process. This assessment should result in a likely and desired level of public participation expected during the process and a blueprint for what should be included in the public notices and where they should be published to maximize the desired involvement.
- ✓ Consideration of comments: during each public process and as an ongoing Civil Rights requirement, the receipt and consideration of public comment will be assessed to ensure that all comments are given equal consideration and due process. The overall consideration of such comments will be monitored to ensure that the appropriate personnel are assigned to the working group who have the knowledge and ability to assess the comment.
- ✓ Immediate corrective action: an ongoing review will allow for immediate action to correct lapses and errors found in procedures, assessments or requirement satisfaction.
- ✓ Documentation: Staff will document compliance with the public participation procedures herein so that consistency can be seen in a review or audit.

Third Year Review:

- ✓ Timing: Review of the Public Participation Process will be a component the Title VI Program updated that is due to the FTA in April of every third year. Staff will review and update procedures to ensure they remain appropriate for changing technologies,

communications media, and demographics. Staff will also recommend other changes to increase the amount and quality of public comments received. Recommended changes to public participation procedures will be forwarded to the Executive Director for his approval before becoming final.

X. DOCUMENTATION AND RECORDS RETENTION

Documentation of correctly executed public participation processes must be made and retained for state and federal audits and future planning purposes. Staff will retain any documents necessary to show consistency with these procedures.

For fare increases, service reductions, and proposed TDPs, the following items will be maintained by the Skagit Transit Planner for a period of four (4) years following the date of the public meeting; or Board's final approval of the plan or program; or the effective date of service reduction or fare increase; whichever is the longest period.

A. Public Notice:

- ✓ Copies of Public Notices, Rider Alerts, or other documents used to notify the public.
- ✓ Copies of the newspaper ad or other form of paid advertisement showing the date of the advertisement and for legal ads, a copy of the affidavit of publication.
- ✓ Written information that identifies affected segments of the community from a Title VI Assessment or other efforts and copies of any written material, such as an outline of steps to identify special communities.
- ✓ A list of the parties notified directly such as a mailing list or copies of emails.
- ✓ A list of places where notices were posted.
- ✓ Any other documentation of methods used to notify the public.

B. Public Meetings:

- ✓ The public notices advertising the meeting.
- ✓ A list of Skagit Transit representatives present and sign-in sheets of members of the public in attendance.
- ✓ Written minutes of the meeting including any comments received by the public.

C. Receipt and Consideration of Comments:

- ✓ Copies of written comments or summary of oral comments received.
- ✓ Copies of written recommendation by working group and any other documentation used to reach the recommendation.
- ✓ Copy of the Executive Director's final decision including any Board minutes if the Board was called upon to review the comment.
- ✓ A summary or written documentation of actions taken or not taken as a result of the comment.

XI. DEFINITIONS / ACRONYMS

CFR: Code of Federal Regulations

CMAQ: Congestion Management and Air Quality grant funding program.

FTA: Federal Transit Administration

LEP: Limited English Proficient

MPO: Metropolitan Planning Organization

NEWSPAPER OF RECORD: paper of general circulation in the PTBA of Skagit Transit. (currently the Skagit Valley Herald.

POP: Program of Projects

PTBA: Public Transit Benefit Area

PUBLIC: includes (but is not limited to) all interested citizens; affected public agencies; representatives of transportation agency employees; private transportation providers; nonprofit organizations and advocacy groups.

RTPO: Regional Transportation Planning Organization

STIP: Statewide Transportation Improvement Program

STP: Surface Transportation Program grant funding program.

TDP: Transit Development Plan

TIP: Transportation Improvement Program (regional/MPO level)

UPWP: Unified Planning Work Program

USC: United States Code

WEBSITE: www.SkagitTransit.org

WSDOT: Washington State Department of Transportation

BOARD: Skagit Transit governing Board of Directors

XII. AUTHORITIES AND CITATIONS

49 USC Chapter 53 – Section 5307: Federal Transit Law – Program of Projects and Public Participation.

23 CFR 450.212(b): Planning Assistance and Standards - Public Involvement.

23 CFR 450.316(c): Metropolitan Transportation Planning and Programming.

49 CFR Part 613: Statewide Transportation Planning.

FTA Circular 9030.1c Urban Grants, Chapter V: Requirements associated with Urbanized Area Formula Grants – Section “M”, Compliance with Planning Requirements.

FTA Circular 4702.1: Title VI Program Guidelines.

RCW 35.58.2795: Public Transportation Systems – Six Year Plans.

Skagit Transit Policy #160.02 – Public Participation Policy

Appendix F – Title VI Analysis of MOA2 Facility

Title VI Equity Analysis

Facility Site Selection: Skagit Transit
Maintenance, Operations, and
Administrative Base

May 4, 2015



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Background and Project Description

Skagit Transit has outgrown its current Maintenance, Operations, and Administrative base (MOA) on County Shop Lane in Burlington, Washington. Understanding that space and capacity constraints would hinder organizational growth and service expansion, Skagit Transit applied for and won a planning grant to study the feasibility of expanding in place or relocating to a new site. The MOA Feasibility Study was completed in March 2015. It found that a site more than two times the size of the current MOA property would be needed to accommodate the next 20 years of growth. The study included the identification and evaluation of possible new sites for the construction of a new MOA.

Study Purpose

Building a new MOA facility will require the acquisition of property or a long-term lease. The purpose of this study is to analyze the top MOA locations identified in the MOA Feasibility Study to ensure the locations were selected without regard to race, color, or national origin. This study also compares the equity impacts of three siting alternatives.

1. FedEx Site - 7.4 acres on Bay Ridge Drive
2. South Mount Vernon Site - 9.3 acres in South Mount Vernon on Old Highway 99 South Road
3. Higgins Airport Way - 9.9 acres on Higgins Airport Way at the Port of Skagit

As per FTA C 4702.1B, Title VI equity analyses for the location of facilities must occur in the planning stage before a preferred site has been selected. Sites have been evaluated and ranked as part of the MOA Feasibility Study process and the Skagit Transit Board of Directors has been notified of top sites through the publication of Feasibility Study 3/18/2015, a Public Open House on 3/31/2015, and a Board Workshop presentation 5/1/2015. To date, no selection of a preferred site has been made and it is unclear when this direction may come.

Title VI Compliance

Skagit Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B. The public can find Skagit Transit's current Title VI Program/Plan that includes steps for submitting a Title VI complaint on the web at:

<http://www.skagittransit.org/about-us/planning-documents/>.

Title 49 CFR Section 21.9(b)(3) states, "In determining the site of location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part." Title 9 CFR part 21, Appendix C, Section (3)(iv) provides, "The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin."

Skagit Transit is required to conduct a Title VI equity analysis to ensure the location is selected without regard to race, color, or national origin. Per guidance in the circular, this analysis must:

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

Community Outreach

Skagit Transit sought community input on the MOA Feasibility Study findings during a month-long public comment period. Between 3/19/2015 and 4/19/2015, Skagit Transit accepted public comments on the MOA Feasibility Study. On 3/31/2015, Skagit Transit held a public open house for people to review study findings, ask questions of staff, and make comments. Notification of the release of the study was made in the following ways:

1. Feasibility Study uploaded to website with information on the Open House and Comment Period
2. Direct mailing to surrounding neighbors and property owners of top sites
3. Email to known stakeholders
4. Notice published in *Skagit Valley Herald*
5. Spanish notice published in the *El Mundo*

During the course of the public comment period, five comments were received.

1. One comment in support of the South Mt. Vernon site but expressing serious concerns about water level and flow rate in the ditch on the east end of the property and how flows and flooding would be impacted by development. The concern was for how filling the property could impact flooding events.
2. One comment in support of the South Mount Vernon site.

3. One comment expressing concerns about impacts to the residents of the mobile home parks to the north and south of the South Mount Vernon site. The commenter was the owner of these age-restricted 55+ mobile home parks. Specific concerns were for increased vehicular traffic, increased noise, and the general increase in activity.
4. One comment in support of the Port properties for emergency management purposes. This comment letter also expressed a general concern for ensuring any project was done in a fiscally responsible way.
5. One comment from the Port of Skagit informing Skagit Transit that one top site (Westar Lane Site) identified in the study was no longer available because the Port had secured another lessee.

Benefits and Burdens Analysis

Benefits and burdens of the project at the community level are different than at the project vicinity level.

There would be no displacement of residents or businesses at any of the three sites considered in this study. Existing buildings on the South Mount Vernon Site are vacant and the FedEx site will be vacant by late fall/early winter of 2015.

At the community level, the biggest difference in the sites is the increased hardship that locating at the FedEx Site or Higgins Airport Way Site would place on public access to the facility. Currently most customer interactions occur at Skagit Station and many transactions occur by mail or email. However, there are customers who come to the MOA to pick up or submit applications for Paratransit service, to purchase bus passes, to apply for reduced fare cards, and to make vanpool payments. The level of transit service to the South Mount Vernon site is planned to be higher than bus service to the FedEx or Higgins Airport Way Sites.

At the project vicinity level, there is concern for adequately mitigating against impacts from noise, traffic, and light on seniors living near the South Mount Vernon site. The South Mount Vernon site shares a north property line with a 34-unit senior community called Evergreen Park. There are also several single family houses across Old Highway 99 from the site that have the potential to be impacted. Vegetative screening along the north property line would be part of design if the South Mount Vernon site is selected and is, in fact, a City of Mount Vernon development code requirement. It is unlikely that the industrial and commercial businesses located at or near the Port or in South Mount Vernon would be impacted by Skagit Transit's operations which are typical of many other light industrial and commercial users.

Port of Skagit Properties	
Potential Positive Community Impacts (Benefits)	Potential Adverse Community Impacts (Burdens)
1. Absence of residential properties in the vicinity of the properties make it unlikely that adverse impacts of noise, light and traffic will have adverse impacts.	1. Weak transit service to area and longer distance from population centers will make it more difficult for the public to access the MOA.

FedEx Property	
Potential Positive Community Impacts (Benefits)	Potential Adverse Community Impacts (Burdens)
2. Absence of residential properties in the vicinity of the properties make it unlikely that adverse impacts of noise, light and traffic will have adverse impacts. 3. Repurposing of existing building would result in minimal environmental impacts.	2. Weak transit service to area and longer distance from population centers will make it more difficult for the public to access the MOA.

South Mount Vernon Site	
Potential Positive Community Impacts (Benefits)	Potential Adverse Community Impacts (Burdens)
1. Increased bus service along Old Highway 99 in south Mount Vernon. 2. Comparable, if not increased, public access to the facility based on distance from population centers and transit availability. 3. Redevelopment of vacant commercial/industrial land to higher use (previously used as outdoor storage for portable toilets).	1. Without adequate mitigation, increased traffic, noise, and light from the facility has the potential to impact residential neighbors.

Site Selection Process

Over 22 properties were identified during the course of the MOA Feasibility Study. These properties were evaluated and ranked based on criteria. The end result that was any property that made it through the two-tiered system received a quantitative score or ranking. Race, color, and national origin were not considered during the identification or evaluation of potential sites.

Tier 2 Site Selection Criteria	
Size	Soil Liquefaction
Useable Area	Utilities (Readily Available)
Location / Operation Efficiency	Fiber
Zoning / Permitting	Site Circulation
Future Growth Potential	Archeological Risks
Expansion/Flexibility	Site Setting /Compatibility
Lot Shape	Traffic Impacts
Topography/Developable	Radio Coverage
Site Encumbrances	Ease of Acquisition
Site Access	Ease of Assemblage
Major Streets Proximity	Fire Marshal Consideration
Steep Slopes	Risk Management
Geology	Land Cost

Alternatives Equity Analysis and Cumulative Impacts

Skagit County has a countywide poverty rate of 12.0%, a minority rate of 23.3%, and a limited English proficiency (LEP) rate of 4.75% or 5,215 individuals (Skagit Council of Governments, 2013 Demographic Profile, www.scog.net). All three sites identified are located in Census Block Groups with lower than countywide averages in these categories.

The South Mount Vernon Site is located in Census Tract 952600, Block Group 3. The FedEx Site and Higgins Airport Ways Site are both located in US Census Tract 951900, Block Group 2. WSDOT'S Application for Local Planning and Community Accessibility (ALPACA) tool was used to populate the following tables (<http://www.wsdot.wa.gov/mapsdata/tools/communityaccessibility/>). ALPACA was developed to facilitate compliance with Federal Transit Administration guidance regarding Title VI non-discrimination, and provide local jurisdictions with information for planning accessible communities and conducting outreach

	South Mount Vernon Site Census Block Group
Total Population	726
White	561
Minority	165
Percent Minority	22.73%
Total in Poverty	10
Percent in Poverty	1.38%
Median Income	\$55,625
LEP (Spanish)	3.0% 21 Count

	FedEx and Higgins Airport Way Site Census Block Group
Total Population	2,644
White	2,445
Minority	199
Percent Minority	7.53%
Total in Poverty	178
Percent in Poverty	6.73%
Median Income	\$82,222
LEP (Spanish)	2.1% 54 Count

	Higgins Airport Way	South Mt. Vernon	FedEx Site
Will selection require displacement of residents or businesses?	No, undeveloped greenfield	No, previously developed brownfield with vacant structures	No, FedEx is vacating site willingly to relocate to new facility in Burlington
List of similar facilities nearby	Uses including transportation and light industrial are located in project vicinity	Autobody, towing, freight transportation, and truck repair shops are in the project vicinity	Uses including transportation and light industrial are located in project vicinity

Conclusions

All locations identified and evaluated for the construction of a new M.O.A. were selected without regard to race, color, or national origin. An evaluation of the poverty rate, minority population rate, and LEP rate in the vicinities of the top 3 sites shows no disparate impact would occur should any of these sites be selected. This conclusion is based on the fact that the rates of poverty, minority population, and LEP are lower in the Census Block Groups than countywide averages. Concerns have been raised for the senior residents living in the mobile home park to the north of the South Mount Vernon site. If this site is selected, project design and operational decisions would consider how to abate impacts. One potential negative impact of locating at the FedEx Site or Higgins Airport Way site is the lower level of planned bus service to these sites as compared to the South Mount Vernon Site. However, there is no bus service to the current MOA so this would not be a reduction in service or accessibility.