



**BEN FRANKLIN**  
**TRANSIT**

# 2025 Title VI Program



**PREPARED BY:**  
**Planning & Service Development**

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BFT operates its programs without regard to race, color, and national origin. To receive additional information on BFT's discrimination obligations, including our complaint procedures, please contact BFT's Title VI coordinator at (509) 734-5107.

If information is needed in another language, contact (509) 735-5100

**\*Spanish version available upon request**  
**\*Versión en español disponible a solicitud**

# Table of Contents

<b>INTRODUCTION</b>	<b>4</b>
<b>1. TITLE VI PROGRAM GENERAL REQUIREMENTS</b>	<b>6</b>
1.1 TITLE VI ASSURANCE	7
1.2 TITLE VI NOTICE TO THE PUBLIC- STATEMENT OF NON-DISCRIMINATION	7
1.3 COMMENT & COMPLAINT PROCEDURES	9
1.4 LIST OF TITLE VI INVESTIGATIONS, COMPLAINTS, & LAWSUITS	11
1.5 PUBLIC PARTICIPATION PLAN	11
1.6 LANGUAGE ASSISTANCE PLAN	13
1.7 MINORITY MEMBERSHIP OF NON-ELECTED COMMITTEES & COUNCILS	13
1.8 SUBRECIPIENT MONITORING	14
1.9 EQUITY ANALYSIS FOR CONSTRUCTION OF NEW FACILITIES	15
1.10 BOARD APPROVAL IF TITLE VI PROGRAM	16
<b>2. TITLE VI PROGRAM TRANSIT PROVIDER REQUIREMENTS</b>	<b>16</b>
2.1 SERVICE STANDARDS	16
2.2 SERVICE POLICIES	18
2.3 DEMOGRAPHIC & SERVICE AREA PROFILE	21
2.4 TITLE VI MAJOR SERVICE & FARE CHANGE POLICIES	32
<b>3. 2024-2025 SERVICE MONITORING REVIEW</b>	<b>33</b>
3.1 SERVICE STANDARDS MONITORING REVIEW	34
3.2 2022-2024 EQUITY ANALYSIS REVIEW	50
3.3 MAJOR SERVICE CHANGES IMPLEMENTED (2022-2024)	51

## Tables

Table 1 – Minority Membership of Non-Elected Committees & Councils	14
Table 2 – Maximum Load Factor Standard Thresholds Vehicle page	17
Table 3– Amenities Distribution by Stop (Average Weekday Boardings)	19
Table 4 – BFT Minority & Low-Income Routes by Population %	21
Table 5 – Minority and Low-Income Distribution by Route	21
Table 6 – Population Percentages by Race/Ethnicity for Benton and Franklin County	22
Table 7 – Population Percentages by Income for Benton and Franklin County	23
Table 8 – Onboard Rider Survey Total Income Results page	24
Table 9 – Onboard Rider Survey Race/Ethnicity Results page	29
Table 10 – Fare Payment Type page	31
Table 11 – Weekday Headway by Route page	36
Table 12 – Average Vehicle Headway by Route	37
Table 13 – Saturday Vehicle Headway by Route	38
Table 14 – Saturday Average Vehicle Headway	39
Table 15 – Sunday Vehicle Headway by Route	39
Table 16 – Sunday Average Vehicle Headway	40
Table 17 – On-time Performance by Minority & Non-minority Routes – October 2024	42
Table 18 – On-time Performance by Minority & Non-minority Routes – March 2025	42
Table 19 – On-time Performance by Low & Not Low-Income Routes – October 2024	43

Table 20 – On-time Performance by Low & Not Low-Income Routes – March 2025	43
Table 21 – Population within ½ a Mile of Fixed-Route Service	43
Table 22 – Amenities Distribution by Stop Ridership (Average Weekday Boardings)	44
Table 23 – Amenities by Route	45
Table 24 – Amenity Distribution by Minority & Non-minority Routes	46
Table 25 – Transit Center Amenities	46
Table 26 – BFT Owned or Leased Park & Rides Within Service Area (Amenities)	47
Table 27 – Vehicle Assignment by Route	48
Table 28 – Vehicle Assignments by Minority & Non-minority Blocks	49
Table 29 – 2022-2024 Major Service Change Overview	51

## Figures

Figure 1 – General Requirements and Transit Provider Requirements	5
Figure 2 – Fare Payment Method by Ridership Group	30
Figure 3 – Usage Frequency by Ridership Type	31
Figure 4– Average Weekday Load on Minority & Non-minority Routes by Time of Day	34
Figure 5 – Average Saturday Load on Minority & Non-minority Routes by Time of Day	35
Figure 6 – Average Sunday Load on Minority & Non-minority Routes by Time of Day	35
Figure 7– Average Weekday Headway by Minority & Non-minority Routes	37
Figure 8 – Average Saturday Headway by Minority & Non-minority Routes	39
Figure 9– Average Sunday Headway by Minority & Non-minority Routes	40
Figure 10– On-time Performance by Route – October 2024	40
Figure 11– On-time Performance by Route – March 2025	41

## Maps

Map 1 – BFT PTBA Minority Population Percentage by Block	24
Map 2 – BFT PTBA Hispanic or Latino Population Percentage by Block Group	25
Map 3 – BFT PTBA Black or African American Population Percentage by Block Group	26
Map 4 – BFT PTBA Low-Income Population Percentage by Block Group	27
Map 5 – BFT PTBA Limited English Proficiency Population Percentage by Block Group	28

## Appendices

APPENDIX A	-	BFT Title VI Complaint Form (English & Spanish)
APPENDIX B	-	Resolution 15-13 – Establishing Title VI Policies
APPENDIX C	-	Resolution 26-14 – Establishing Title VI Public Involvement Process

# Introduction

Ben Franklin Transit (BFT) operates public transportation services across a 624 square-mile Public Transit

Benefit Area (PTBA) within Benton and Franklin counties in Washington State. The PTBA encompasses the cities of Kennewick, Pasco, Richland, West Richland, Benton City, Prosser, and several unincorporated areas in Benton and Franklin counties. BFT's operations are managed under a single enterprise fund, using the same accrual accounting method as private businesses. BFT does not have any subrecipients and does not pass Federal Transit Administration (FTA) funds to subrecipients.

As of 2024, the estimated population of BFT's PTBA is [287,689](#) (according to the Washington State Office of Financial Management), while Benton and Franklin counties together have an estimated population of [319,428](#) (based on population estimates per US Census). The PTBA and surrounding areas have a diverse population, with 43% identifying as minority groups and 12% considered low-income. To ensure equitable access to transit services for these communities, BFT has developed this Title VI Program and related documents in accordance with Title VI of the Civil Rights Act of 1964, Title 49, Chapter 53, Section 5332 of the United States Code, and the Federal Transit Administration's Circular 4702.1B, "Title VI Program Guidelines for Federal Transit Administration Recipients," effective October 1, 2012.

BFT's Title VI Program outlines how the agency meets the requirements set forth in FTA Circular 4702.1B and reaffirms its commitment to ensuring that no individual is denied access to transit services based on race, color, or national origin.

*Figure 1 – General Requirements and Transit Provider Requirements*

General Requirements
<ul style="list-style-type: none"> <li>• Provide Title VI Assurance</li> <li>• Prepare and Submit Title VI Program</li> <li>• Notify Beneficiaries of Protection Under Title VI</li> <li>• Develop and Maintain Title VI Complaint Procedures &amp; Complaint Form</li> <li>• Record and Report Transit-Related Title VI Investigation, Complaints, and Lawsuits</li> <li>• Promote Inclusive Public Participation</li> <li>• Provide Meaningful Access to LEP Persons</li> <li>• Report Minority Representation on Planning and Advisory Bodies</li> <li>• Provide Assistance to Subrecipients</li> <li>• Monitor Subrecipients</li> <li>• Determination of Site or Location of Facilities</li> </ul>

Transit Provider Requirements
<ul style="list-style-type: none"> <li>• Set System-Wide Service Standards and Policies <ul style="list-style-type: none"> <li>• Load Factor</li> <li>• Vehicle Headway</li> <li>• On-Time Performances</li> <li>• Equitable Distribution of Service, Vehicles &amp; Amenities</li> </ul> </li> <li>• Collect and Report Demographic Data</li> <li>• Race/Ethnicity <ul style="list-style-type: none"> <li>• Income</li> <li>• Limited English Proficiency</li> </ul> </li> <li>• Monitor Transit Services &amp; Report Results</li> <li>• Evaluate Major Service &amp; All Fare Changes</li> </ul>

## 1. TITLE VI PROGRAM GENERAL REQUIREMENTS

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Federal Transit Administration (FTA) fund recipients are required to demonstrate compliance with the U.S. Department of Transportation's (DOT) Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer every three years. To comply with Title VI of the Civil Rights Act of 1964,

Title 49, Chapter 53, Section 5332 of the United States Code, and FTA Circular 4702.1B, recipients must:

- Ensure meaningful access for Limited English Proficiency (LEP) populations.
- Ensure non-discriminatory selection of new facility sites.
- Establish and maintain a Title VI Complaint procedure.
- Notify the public of their Title VI protections.
- Promote inclusive participation through a structured public involvement process.
- Provide Title VI assurance.
- Record and report Title VI investigations, complaints, and lawsuits.
- Report on minority representation on advisory boards.
- Support and monitor subrecipients for Title VI compliance.

This section outlines how Ben Franklin Transit (BFT) meets these general requirements as set forth in FTA Circular 4702.1B.

In addition, BFT operates its programs and services in accordance with Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (LEP). BFT also adheres to guidance provided by the Federal Transit Administration (FTA) in managing financial assistance, ensuring compliance with both Title VI regulations and the principles of Environmental Justice and LEP. Although low-income and LEP individuals are not specifically identified as protected classes under Title VI, BFT remains committed to upholding Title VI while addressing the needs of marginalized communities. This commitment is reflected in BFT's planning, public outreach, and decision-making processes.

### **1.1 TITLE VI ASSURANCE**

Title VI of the Civil Rights Act of 1964 section 601 states:

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

BFT, a direct recipient of federal funds from the FTA, is required to operate its programs and services in a manner that does not discriminate based on race, color, or national origin, in accordance with Title VI and other relevant laws. To ensure compliance with Title VI, BFT must review and update its Title VI Program every three years, as specified in FTA Circular 4702.1B.

### **1.2 TITLE VI NOTICE TO THE PUBLIC- STATEMENT OF NON-DISCRIMINATION**

BFT is committed to providing its programs and services without discrimination based on race, color, or national origin. To inform the public of this commitment and ensure that no individual is denied access to



transit services, BFT notifies the public of their Title VI protections with the following statement:

**English**

*BFT operates its programs and service without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964 and other applicable laws. Persons who feel they have been subjected to discrimination because of their race, color, or national origin may file a complaint with BFT. A complaint must be filed in writing within 180 days of knowledge regarding a possible discriminatory act. Complaints should be addressed to BFT, Title VI Coordinator, 1000 Columbia Park Trail Richland, WA 99352. For additional information please contact BFT's Title VI Coordinator at (509) 734-5107 or email [TitleVICoordinator@bft.org](mailto:TitleVICoordinator@bft.org).*

*If you need information in another language, please call (509) 735-5100.*

**Spanish**

*BFT opera sus programas y servicios sin distinción de raza, color u origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles de 1964 y otras leyes aplicables. Las personas que sienten que han sido objeto de discriminación debido a su raza, color u origen nacional pueden presentar una queja ante BFT. Una queja debe presentarse por escrito dentro de los 180 días de conocimiento de un posible acto discriminatorio. Las quejas deben dirigirse a BFT, Coordinador de Título VI, 1000 Columbia Park Trail Richland, WA 99352. Para obtener información adicional, comuníquese con el Coordinador de Título VI de BFT al (509) 734-5107 o envíe un correo electrónico a [TitleVICoordinator@bft.org](mailto:TitleVICoordinator@bft.org).*

*Si necesita información en otro idioma, comuníquese al (509) 735-5100.*

This non-discrimination statement is displayed in both English and Spanish in the foyers of the Administration Building, Operations Building, and Customer Service Center. BFT will take additional steps to increase the visibility of the Title VI Notice to the Public. These steps include evaluating the possibility of posting the statement at transit centers and other high-traffic areas where customers are most likely to see it.

An abbreviated version of BFT's Title VI Notice to the Public is also included in external planning documents, and other informational materials. This shortened version informs the public of their Title VI protections with the following statement:

**English**

*BFT operates its programs without regard to race, color, or national origin. To receive additional information, please contact (509) 735-5100.*

**Spanish**

*BFT no discrimina por motivos de origen étnico, color ni procedencia. Para recibir información adicional comuníquese con nosotros al (509) 735-5100.*

If BFT distributes federal funds to another government entity or subrecipient, it will include Title VI language in all written agreements and will monitor compliance accordingly.

**Organizational Responsibilities**



BFT's Chief Executive Officer (CEO) is responsible for ensuring compliance with the agency's nondiscrimination policy and applicable laws. The Chief Planning and Development Officer (CDPO) will oversee compliance with grants, programs, activities, and Title VI coordination while acting as the agency's Title VI Officer.

### **1.3 COMMENT & COMPLAINT PROCEDURES**

#### **General Public Comment Procedures**

The BFT Customer Comment Policy is designed to provide all customers—whether using bus, paratransit, vanpool, or contracted services—an easy and accessible way to share feedback with the agency. BFT welcomes all forms of customer input, including comments, complaints, concerns, and suggestions.

BFT accepts public comments through the following channels:

- **Customer Comment Cards:** Available on BFT and contractor vehicles and at Pass Outlets, in both Spanish and English, with no postage required.
- **Email:** Riders can email BFT at [contact@bft.org](mailto:contact@bft.org)
- **In-person:** Comment cards are available at the Three Rivers Customer Service Center (7109 W. Okanogan Place, Kennewick, WA 99336) and the Administration Building (1000 Columbia Park Trail, Richland, WA 99352).
- **Language Line:** For riders who speak languages other than English, BFT utilizes Prisma International to facilitate communication. Additionally, bilingual staff are available to assist LEP (Limited English Proficiency) customers.
- **Telephone:** Riders can contact BFT's Customer Service Department at (509) 735-5100 or use designated public comment lines when available.
- **U.S. Mail:** Send comments to 1000 Columbia Park Trail, Richland, WA 99352.
- **Website:** Riders can provide feedback through the "CONTACT" link on the BFT website, [www.bft.org](http://www.bft.org) Google Translate is also linked to assist communication with LEP customers.

**Feedback Review Process** BFT values all customer feedback. Anyone who submits a comment, complaint, or service suggestion and requests a response will receive an initial reply within 15 working days, if legible contact information is provided. Complaints are documented and investigated by staff, and suggestions are reviewed to improve services when possible. Appropriate actions are taken to address issues regarding staff, equipment, or processes.

#### **Policy Information**

Information about the Customer Comment Policy, including how to submit a complaint, is made available to riders in our schedule book, on the BFT website, at all sales outlets, and on our vehicles.

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

BFT is committed to ensuring that no individual is excluded from participation in or denied the benefits of its transit services based on race, color, or national origin, as protected under Title VI of the Civil Rights Act, in accordance with FTA Circular 4702.1B. BFT is also dedicated to preventing discrimination based on

age or economic status. To support this, BFT has established a formal complaint process to track and address any complaints or claims of discrimination on the grounds of race, color, or national origin.

**Filing a Title VI Complaint** Individuals may file a signed, written complaint within 180 days of the alleged discrimination. The complaint should include the following information:

- Name, mailing address, and how to contact the complainant (i.e. telephone number, email address, etc.).
- How, when, where, and why they believe they were discriminated against. Complaints should include the location, names, and contact information of any witnesses.
- Other information that they deem significant.

The complaint may be filed in writing or by contacting BFT at the following address or phone numbers:

**Ben Franklin Transit  
Title VI Coordinator  
1000 Columbia Park Trail  
Richland, WA 99352-4851  
By phone: (509) 734-5107  
By email: [TitleVICoordinator@bft.org](mailto:TitleVICoordinator@bft.org)  
By fax: (509) 735-4392**

BFT encourages individuals to submit discrimination complaints in writing or electronically. All complaints must be signed by the complainant and submitted within 180 days of the incident that is the basis for the complaint under Title VI. The Title VI Coordinator will arrange reasonable accommodation as necessary.

**Complaint Review Procedure** All complaints alleging discrimination based on race, color, or national origin in services or benefits provided by BFT will be promptly addressed by the agency. BFT will also provide appropriate assistance to complainants, including individuals with disabilities or those who have limited English proficiency. Furthermore, BFT will make every effort to resolve all complaints in a timely and thorough manner.

If additional information is required to investigate a complaint, BFT will contact the complainant in writing, unless another method of communication is requested. Please be aware that failure to provide the requested information may result in the administrative closure of the complaint. Once BFT has received enough information to investigate the complaint, a draft written response will be prepared and reviewed by the transit's attorney. If deemed appropriate, the BFT attorney may administratively close the complaint. In such cases, BFT will notify the complainant of this action as soon as possible.

**Notification of the outcome of a complaint** BFT will send a final written response to the complainant, informing them of their right to:

- 1- Appeal the decision within seven (7) calendar days of receiving the final written response from BFT, and/or

- 2- File a complaint externally with the Department of Transportation (DOT) and/or the Federal Transit Administration (FTA).

BFT will make every effort to respond to Title VI Complaints within five (5) working days of receipt of such complaints, if not sooner. In addition to the complaint process described above, a complainant may file a Title VI Complaint with the following offices:

**FTA Region 10 Office of Civil Rights**  
**Suite 3142**  
**915 Second Avenue, St 3142**  
**Seattle, WA 98174**  
**Phone: 206.220.7954 Fax: 206.220.7518**

**FTA Office of Civil Rights**  
**East Building, 5<sup>th</sup> Floor – TCR**  
**1200 New Jersey Ave., SE**  
**Washington DC 20590**  
**Phone: 888.446.4511**

### **Title VI Complaint Form**

BFT's Title VI Complaint Form is available online in both English and Spanish. Physical copies of the form can be requested by complainants, and the form is also included in **Appendix A**.

### **Protection from Retribution**

Customers of BFT have the right to submit complaints, provide feedback, or participate in the public involvement process without fear of retaliation. If a customer feels they have been treated unfairly as a result of their feedback, they should contact the BFT Office of the Chief of Planning & Development. BFT will take appropriate disciplinary action against any employee or contractor who retaliates against a customer.

## **1.4 LIST OF TITLE VI INVESTIGATIONS, COMPLAINTS, & LAWSUITS**

Since the submission of BFT's last Title VI Program update in 2022, there have been no active investigations, complaints, or lawsuits against BFT alleging discrimination related to fares, routing, scheduling, or the quality of transportation services based on race, color, or national origin.

## **1.5 PUBLIC PARTICIPATION PLAN**

### **Policy Statement and Purpose**

BFT is committed to encouraging comments and feedback, including complaints, on its proposed Program of Projects (POP), service changes, fare changes, and other policies. In accordance with Title VI, BFT has established thresholds for this public comment process. The Disproportionate Burden and Discriminatory Impact Policies (section 2.4) are included in this document as part of the required public input, and BFT's commitment to addressing any concerns related to service and fare changes within the system.

Additionally, BFT actively encourages feedback on policies that may affect its customers. To gather input, BFT frequently conducts surveys, public forums, and open houses, alongside the formal comment process. The Customer Comment Record tracks concerns or feedback received from the public.

## **Public Involvement Processes**

Changes that require a public process will align with BFT's Title VI policies. At the discretion of the Chief of Planning and Development, other policies may also undergo a Public Input Process.

Public involvement will be engaged for significant service changes, disparate impact analysis, capital projects, and fare changes.

A major service change is defined as one of the following:

- Any change to a route that eliminates more than 20% of the route's revenue hours. All major service changes will undergo an equity analysis, including an assessment of any adverse effects.
- Any change where the system-wide revenue hours allocated to minority areas fall below the share of the service area population residing in those minority areas.

Disparate Impact is defined as one of the following:

- A disparate impact occurs when 20% or more of the reduction in system revenue hours happens within minority or low-income areas.
- A service change causing a disproportionate burden when the low-income population negatively impacted by a fare or service change exceeds the average low-income population in BFT's service area by 20% or more.
- A service change resulting in an adverse effect, which may include reductions in service based on geographic area or time (e.g., changes in service span, frequency, route segment elimination, re-routing, or route elimination).
- Fare changes.
- Program of Projects (POP) as outlined in the Transit Development Plan (TDP), Transportation Improvement Program (TIP), and any Environmental Justice (EJ) Analysis.

**Procedures** To ensure maximum public input and involvement in decisions regarding major service changes and fare increases, BFT follows these procedures:

- All input and comments—including public hearing minutes, CAN recommendations, and BFT staff recommendations—will be provided to the BFT Board of Directors prior to any decisions regarding changes to the Program of Projects, major services, fares, or other policies. Interpreters will be present at all public hearings to assist with translation and to collect comments.
- BFT is committed to supporting the CAN to ensure a more resilient and effective network.
- Customers, the public, and the community will be informed of proposed changes, the comment process, and public hearings through a variety of channels, including newspaper ads, multimedia news releases, onboard flyers, postings at BFT offices, and the BFT website. All communications will be available in both Spanish and English.
- Proposals for major service changes and fare increases will be presented to the BFT Citizens Advisory Network (CAN) for discussion, review, and comment. The CAN includes representatives from diverse community groups, such as individuals with disabilities, educational institutions,

major employers, and LEP (Limited English Proficiency) communities.

- Provide at least 30 days' advance notice of public hearings related to major service changes or fare increases, in both Spanish and English.

### **Information Dissemination**

BFT is dedicated to ensuring that all staff members are aware of Title VI requirements and best practices. Special emphasis is placed on training vehicle operators, ensuring they are well-versed in Title VI components, with a focus on effectively assisting Limited English Proficiency (LEP) customers. Additionally, BFT's Board of Directors is regularly updated on Title VI matters, receiving information from the Title VI officer regarding compliance requirements and agency policies. These efforts help ensure that Title VI information is disseminated to the public and throughout all levels of the organization, from operators to the Board of Directors.

## **1.6 LANGUAGE ASSISTANCE PLAN**

BFT's Public Transportation Benefit Area (PTBA) serves a diverse population, including a significant number of individuals with limited or no English proficiency. These individuals are known as Limited English Proficiency (LEP) persons, defined as those for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. According to the U.S. Census, LEP persons are those who report speaking English "less than very well," "not well," or "not at all."

To address the needs of LEP populations, BFT has developed a Language Assistance Plan that outlines outreach strategies to ensure meaningful access to its programs and services. These strategies were developed based on a Four-Factor Analysis in accordance with the U.S. Department of Transportation's LEP guidance. BFT is also working on adopting a policy to guide how the Language Assistance Plan is updated and implemented. This plan will be overseen by the Marketing team, which also manages customer service, ensuring effective communication with the public and inclusivity for LEP persons.

## **1.7 MINORITY MEMBERSHIP OF NON-ELECTED COMMITTEES & COUNCILS**

BFT has one non-elected advisory council: the Citizens Advisory Network (CAN). The CAN meets quarterly as needed.

As of May 19<sup>th</sup>, 2025, three of the eight CAN members self-identify as part of a minority population (Table 1). BFT actively recruits and engages with community groups to find additional diverse individuals to represent their organizations or interest groups on the CAN. Applications and information for the CAN are available in both English and Spanish on BFT's website.

BFT's CAN members have previously represented a diverse array of organizations and interest groups, including:

- |  |                                   |
|--|-----------------------------------|
| • Clean Air/Good Roads/Energy Advocate         | • Commerce                        |
| • Chamber of Commerce and Economic Development | • Children Development            |
| • Tri-Cities Hispanic Chamber of               | • Human Services/Senior Providers |
|  | • Law Enforcement                 |

- Mental Health Advocate
- Advocate for Individuals with Disabilities
- Major Employers
- Former Fixed-Route Operator
- Former Board of Directors Member
- Fixed-Route riders
- Dial-A-Ride riders
- Vanpool riders

*Table 1 – Minority Membership of Non-Elected Committees & Councils*

Race / Ethnicity	Citizens Advisory Network % (Individuals)	General Population %
African American / Black	0%	2.3%
American Indian & Alaska Native	0%	1.8%
Asian persons	0%	3%
Native Hawaiian & Other Pacific Islander	0%	0.4%
Other	0%	3.2%
Persons of Hispanic or Latino Origin	37.5% (3)	41%
Caucasian/White (not Hispanic)	62.5% (5)	51.7%
Minority %	37.5% (3)	48.3%

## 1.8 SUBRECIPIENT MONITORING

BFT does not have any subrecipients and does not allocate FTA funds to any subrecipients. Should BFT decide to begin funding a subrecipient in the future, it will take the necessary steps to ensure that the subrecipient operates its programs in full compliance with Title VI, without regard to race, color, or national origin.

In accordance with 49 CFR 21.9(b), BFT will provide the following to any subrecipient:

1. Sample notices to the public informing beneficiaries of their rights under DOT's Title VI regulations, instructions on how to file a Title VI complaint, and the subrecipient's Title VI Complaint Form.
2. Demographic information, including race and English proficiency data for the residents served by the subrecipient. This information will help the subrecipient assess the quality and level of service provided and evaluate the need for language assistance in its service area.
3. Procedures for tracking and investigating Title VI complaints filed with a subrecipient, along with a clear expectation of when the subrecipient must notify BFT of any complaints it receives.
4. Any other relevant data generated or obtained by BFT, such as travel patterns or survey results, that will assist the subrecipient in meeting Title VI requirements.

To ensure subrecipient compliance with DOT Title VI regulations, BFT will actively monitor their adherence

to the regulations. If a subrecipient fails to comply with Title VI requirements, BFT will also be considered out of compliance. To ensure both BFT and its subrecipients remain compliant with Title VI, the following procedures will be implemented:

1. Document the process is used to ensure that all subrecipients comply with the general reporting requirements of this circular, as well as any additional requirements based on the type of entity and the number of fixed-route vehicles it operates in peak service, if applicable.
2. Collect and review Title VI Programs submitted by subrecipients to ensure compliance.
3. Upon request from the FTA, in response to a discrimination complaint, or as otherwise deemed necessary by BFT, BFT will ask subrecipients who provide transportation services to verify that their services are provided equitably in compliance with FTA Circular 4702.1B, Chapter III-11. Subrecipients who are fixed-route transit providers are responsible for reporting as outlined in Chapter IV of this Circular.

### **1.9 EQUITY ANALYSIS FOR CONSTRUCTION OF NEW FACILITIES**

BFT will work closely with the FTA to ensure that the environmental analysis for proposed capital projects aligns with the requirements of the National Environmental Policy Act (NEPA) and the Washington State Environmental Policy Act (SEPA). When a categorical exclusion, environmental assessment, or environmental impact statement is required, BFT will ensure that Environmental Justice analyses are incorporated, in accordance with Section IV-8 of FTA Circular 4702.1B. Moreover, as these projects are developed, BFT will implement a comprehensive public outreach and engagement program to provide the public with early and ongoing opportunities for involvement in the decision-making process.

Once the FTA has developed guidance on facility siting, BFT will adhere to said guidance. In the interim, BFT will take proper measures to mitigate any negative impacts or burdens that future capital projects will have on the low-income and minority populations within BFT's PTBA.

#### **Notable Planned Projects**

##### ***Projects from 2025 - 2031***

- 22<sup>nd</sup> Avenue Transit Center Redevelopment
- West Pasco Transit Center
- Facilities Maintenance Building
- Frequent Corridor Project
- Bus Stop Concrete Construction and Amenity Installation (on-going)
- Bus Stop Signage Update
- Fairground Passenger Platform Improvements



## **1.10 BOARD APPROVAL IF TITLE VI PROGRAM**

**(Appendix G) Added to Final Document**

## **2. TITLE VI PROGRAM TRANSIT PROVIDER REQUIREMENTS**

In accordance with Title VI of the Civil Rights Act of 1964, Title 49, Chapter 53, Section 5332 of the United States Code, and Federal FTA Circular 4702.1B, the FTA mandates that all transit providers establish system-wide service standards and policies in the following areas:

- Load factor
- Vehicle headways
- On time performance
- Equitable distribution of services, vehicles, and amenities

Additionally, BFT is classified as a transit provider that operates 50 or more fixed-route vehicles during peak service and is located within a UZA (Urbanized Area) with a population of 200,000 or more. This classification imposes additional requirements on BFT, which include the following actions to be completed on a triennial basis:

- Collect and report demographic data related to service
- Evaluating major service changes and all fare changes.
- Monitoring and reporting on all fixed-route transit services to ensure alignment with service standards and policies

This section outlines how BFT meets the specific requirements for transit providers as outlined in FTA Circular 4702.1B.

### **2.1 SERVICE STANDARDS**

#### **Overview**

BFT's service standards play a key role in guiding decisions related to service planning, including the system's structure, route alignments, stop locations, service hours, frequency, and the areas served by the community. The section below outlines the system-wide service standards that comply with Title VI requirements. According to Title VI, all fixed-route transit providers must establish quantitative standards for their operations in the following areas. The objectives outlined below are designed to ensure adherence to the service standards specified in Title VI Circular FTA C 4702.1B. These service standards were first adopted by the Board of Directors in 1982, with subsequent updates to the Title VI Program in 2016, 2019, and 2022.

**Service Standard Objectives** To ensure compliance with each mode and method, BFT monitors the following key metrics:

- Vehicle Load
- Vehicle Headway
- On-time Performance
- Service Availability

### Vehicle Load Standard

BFT has established a load standard of 1.25 for its fixed-route service during peak operating hours, ensuring that vehicle capacity is not exceeded (refer to Table 2). A load factor of 1.25 means all seats are occupied, with no more than 25% of passengers standing. If a trip or route consistently reaches or exceeds a 1.25 load factor, corrective measures such as increasing service frequency or adding overload service will be taken to alleviate overcrowding.

*Table 2 – Maximum Load Factor Standard Thresholds Vehicle*

Vehicle Type	Capacity	Seated	Standing	Total	Load Factor
29' Bus	23	23	6	29	1.25
35' Bus	38	38	9	47	1.25
40' Bus	44	44	11	55	1.25

BFT staff have concluded that a vehicle load standard for its Demand Response services is unnecessary, as most paratransit trips accommodate only a single customer, with the average load typically being fewer than two (2) customers per vehicle.

### Vehicle Headway Standard

BFT adjusts route headways based on ridership demand and market potential, considering load factors, productivity, and development growth in the planning process. Current vehicle headways range from 15 to 60 minutes, except for Route 170, which operates 60 minutes during peak and 120 minutes during off-peak times. Efforts were made in 2024 to increase the frequency of Route 170 from its prior 120-minute all-day service. In 2021, BFT introduced two high-frequency corridor routes (Routes 1 and 3), which run at fixed 15-minute frequency for the majority of a weekday. s for most of the weekday service. These routes provide high-frequency service between Knight St. Transit Center (Richland), Three Rivers Transit Center (Kennewick), and 22nd Ave. Transit Center (Pasco).

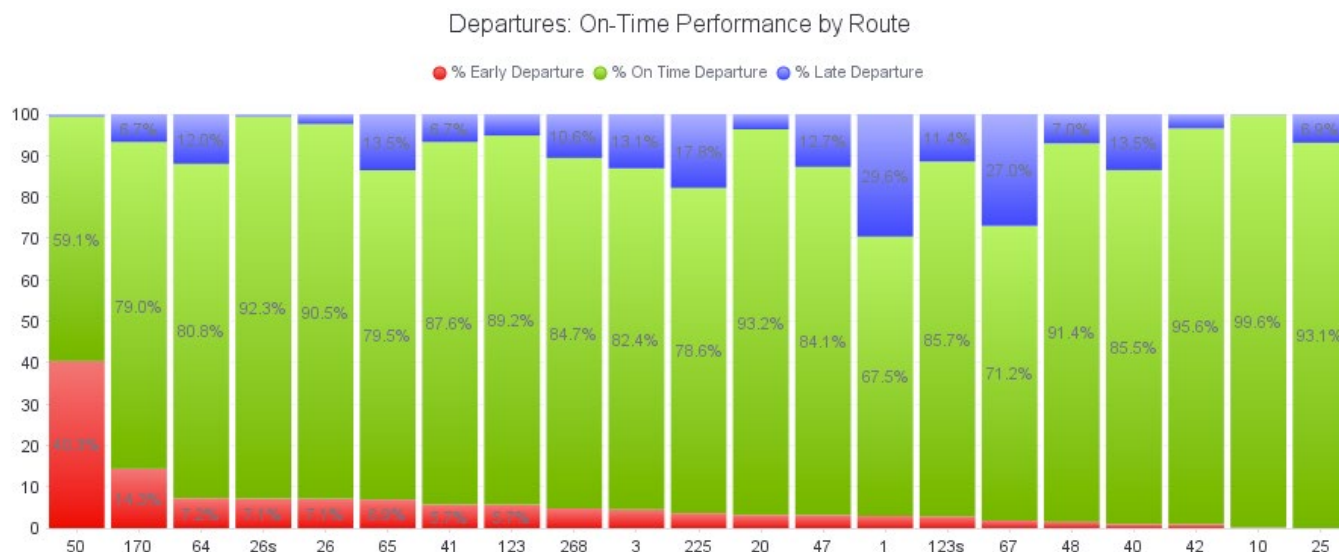
### On-Time Performance Standard

On-time performance (OTP) standards vary by mode. For fixed-route services, a bus is considered early if it departs at a scheduled time point no more than 1 minute earlier and late if it arrives more than five (5) minutes after the scheduled time. For Demand Response services, a paratransit vehicle is considered late if it arrives more than 30 minutes after the scheduled time.

BFT has set an internal goal of 90% OTP for its fixed route bus operation, and 95% for its on-demand Dial-A-Ride service. For the data collection period, significant road construction was underway, drastically affecting Routes 1, 225, and 268. Overall, the fixed-route on-time performance was 82.8%, with 4.9% of

trips arriving early and 12.2% arriving late.

An OTP analysis conducted by a consultant in 2023 and 2024 led to targeted adjustments for peak periods, resulting in improved on-time performance. As of March 2025, OTP has increased to 89.4%, with early arrivals reduced by 50% to 2.3%. Ongoing monitoring and quicker response times to operational changes continue to support these improvements.



### Service Availability Standard

BFT allocates fixed-route bus service primarily based on observed demand, population trends, and land use patterns. In 2020, BFT launched CONNECT, an on-demand option designed to expand transit access to areas where demand does not justify fixed-route service. Through CONNECT, BFT ensures that all residents within the PTBA have access to either fixed route or on-demand services. The demand response (DAR) paratransit service operates throughout the PTBA on an eligibility basis, with regular rates applying when the origin and destination are within  $\frac{3}{4}$  of a mile of the service boundary, and premium rates applying when either the origin or destination is beyond  $\frac{3}{4}$  of a mile from the boundary. BFT staff will work to update its Service Availability Standard and other standards and policies within its Title VI Program in 2026.

## 2.2 SERVICE POLICIES

### Overview

The following section outlines system-wide service policies that fulfill Title VI requirements. Title VI mandates that all fixed-route transit providers establish standards for all fixed-route modes of operation. The required indicators under Title VI Circular FTA C 4702.1B include the following:

**Service Policies Objective** The following objectives ensure compliance with Title VI and monitor key aspects of BFT's operations:

- Monitor distribution of Transit Amenities

- Monitor Vehicle Assignment

## Transit Amenities Distribution

**Distribution** BFT's distribution and investment in transit amenities are based on several factors, with ridership demand being the most important. This demand is influenced by both current and projected development in the communities BFT serves.

Originally, amenity distribution was guided by productivity standards established in the BFT Stop Guidelines and Amenities Policy, adopted by the Board of Directors in May 2018. BFT is currently revising these standards to incorporate lessons learned from the first round of improvements. This updated policy will reflect the new standards. BFT uses a scoring system based on ridership and frequency to determine the types of amenities provided at each stop, as well as the expected development in the area served by the stop. The availability of right-of-way (ROW) space determines the priority of improvements, which are then assigned a timeline based on the stop's priority group. Stops are assigned labels based on a score calculated by dividing the number of boardings by the route frequency, which helps define the minimum amenities required at each fixed-route stop.

The labels are categorized as follows:

- Basic: Less than five (5) average weekday boardings.
- Enhanced: five (5) to 15 average weekday boardings.
- Shelter: More than 15 average weekday boardings.

The average weekday boarding thresholds for amenity placement are based on the best practices outlined in TCRP Report 19, which have been adapted and modified for BFT (see Table 3). Additional factors influencing amenity placement include whether the stop is located on a Metro Route and if there are any constraints that could prevent BFT from installing the recommended amenities, such as: right-of-way limitations, property owner objections, jurisdictional disapproval, etc.

BFT's service area spans multiple jurisdictions, including six cities across two counties. Each jurisdiction has its own procedures, development patterns, standards, and differing approaches to right-of-way (ROW) permitting, other permits, and the processes BFT must follow to perform work within the ROW. Due to inconsistent development along BFT's fixed routes, policies for distributing transit amenities cannot always be applied uniformly across the service area. Nevertheless, BFT is committed to ensuring the equitable distribution of transit amenities to the best of its ability.

*Table 3– Amenities Distribution by Stop (Average Weekday Boardings)*

Amenity	Basic <5 daily boardings	Enhanced 5-15 daily boardings	Shelter >15 daily boardings
No Parking Restriction	<i>Recommended at all stops</i>		
ADA 5' x 8' Landing Pad & 3' x 5' Clear Floor Space	<i>Required at all stops, unless reasonably justified</i>		
Bus Stop Sign on Separate Pole	<i>Recommended at all stops</i>		

Lean Rail	Optional	Optional	Optional
Bench	Optional	Recommended	Provide
Shelter	Optional	Optional	Recommended
Display Case	Optional	Optional	Optional
Lighting	Optional	Optional	Recommended
Trash Can	Optional	Recommended	Provide
Rider Information Panel	Optional	Recommended	Provide
Bicycle Rack*	Optional	Optional	Optional
Bicycle Repair Station*	Optional	Optional	Optional

**\*Bicycle Infrastructure recommended in locations near multi-use/bike trails**

Once the assigned amenities are determined and reviewed against BFT's Bus Stop Design Standards, each stop is categorized into priority groups. These priority groups dictate how and when each stop is addressed, based on an assessment of the right-of-way (ROW) at the location or proposed location, which is accessed through the corresponding county assessor's website.

- **Group 1:** Stops that are ready for installation.
- **Group 2:** Stops that are ready to be built, including both amenities and necessary ADA compliance improvements.
- **Group 3:** Stops located outside the ROW, requiring an agreement with the property owner to perform work.
- **Group 4:** Stops that require a site-specific or custom design (e.g., the need for a retaining wall).

### Transit Access

BFT's fixed-route service averages one stop every ¼ mile on most routes and provides flag stops where customers can signal the bus if safety standards are met. Flag stops are locations without a physical pole, allowing riders to flag down the bus as it arrives. BFT is gradually phasing out flag stops by replacing them with physical stop signs or eliminating them altogether if the stop is poorly located and experiences minimal ridership. BFT also strives to accommodate stop-location requests from the public. For service planning and evaluation, BFT assumes that the maximum distance customers will walk to access local urban fixed-route service is ½ mile.

### Vehicle Assignments

Vehicle Assignments for fixed routes are based on operational requirements such as vehicle size, route capacity, and turning radius. Dispatch assigns buses to specific operational blocks each month. Buses that are out for maintenance or other reasons are replaced daily with vehicles from the spare fleet. Drivers receive their assigned bus number upon checking in with Dispatch. Buses are assigned to routes based on ridership capacity and the anticipated need for additional capacity. BFT uses buses of the same size

interchangeably for daily assignments, ensuring that both newer and older vehicles are used in minority and non-minority neighborhoods alike. The age of the fleet is also considered when assigning vehicles to different routes or blocks.

## 2.3 DEMOGRAPHIC & SERVICE AREA PROFILE

### Overview

In accordance with Title 49 CFR 21.9(b), which requires recipients of Federal financial assistance to provide access to racial and ethnic data reflecting the beneficiaries of their programs, BFT collects and analyzes demographic data, including race, economic status, spoken languages, and transit service participation. The analysis shows that approximately 43% of the population in BFT's PTBA and surrounding areas are minority groups, while 12% of households have incomes at or below the federal poverty line. Additionally, 12% of residents are classified as Limited English Proficiency (LEP) persons.

To create geographic visual representations of these demographics, BFT used U.S. Census data, including the 2019-2023 American Community Survey 5-Year Estimates, and 2020 Census Results. Geographic Information Systems (GIS) software and the third-party mapping tool Remix were employed to produce these visual maps (see Tables 4 and 5).

The following steps were taken to ensure the analysis adhered to FTA Circular 4702.1B:

- Established minority percentages for both the total service area and within ¼ mile of a fixed route.
- Established the overall minority percentage for the total service area and surrounding areas.
- Identified census tracts with minority populations equal to or greater than the service area's minority percentage.
- Measured the percentage of the minority population in all census tracts.

*Table 4 – BFT Minority & Low-Income Routes by Population %*

Service Area Minority Average	Service Area Low-Income Average
43%	12%

*Source: American Community Survey, 2019-2023 ACS 5-Year Estimates*

*Table 5 – Minority and Low-Income Distribution by Route*

Route	Percent Minority (1/4 Mile)	Percent Low Income (1/4 Mile)	Minority Route
1	56%	23%	YES
3	78%	28%	YES
10	24%	4%	
20	25%	11%	
25	27%	15%	

26	30%	14%	
40	54%	25%	YES
41	47%	14%	YES
42	52%	20%	YES
47	43%	13%	YES
48	45%	19%	YES
50	24%	5%	
64	87%	20%	YES
65	91%	21%	YES
67	62%	11%	YES
123	27%	10%	
170	43%	21%	YES
225	54%	11%	YES
268	54%	15%	YES

Source: American Community Survey 5-year; 2019-2023

### Race & Ethnicity

Race and ethnicity are analyzed by identifying minority populations residing within or near BFT's service area. Minority populations are classified as distinct groups of individuals who share similar racial or ethnic characteristics and live in close proximity to one another. The following groups are considered minority populations:

- **American Indian and Alaska Native:** Individuals with origins in any of the original peoples of North, South, or Central America, who maintain tribal affiliation or community ties.
- **Asian:** Individuals with origins in the Far East, Southeast Asia, or the Indian subcontinent, including but not limited to Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippines, Thailand, and Vietnam.
- **Black or African American:** Individuals with origins in any of the Black racial groups of Africa.
- **Hispanic or Latino:** Individuals of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish cultures or origins, regardless of race.
- **Native Hawaiian or Other Pacific Islander:** Individuals with origins in Hawaii, Guam, Samoa, or other Pacific Islands.
- **Two or More Races/ Some Other Race:** Individuals who identify with more than one race or with a race not specifically listed above.

A **predominantly minority area** refers to a geographic area (such as a neighborhood, Census tract, block group, or traffic analysis zone) where the percentage of minority residents exceeds the average proportion of minority residents in the overall service area.

Based on further analysis, it has been determined that 43% of the population in BFT's PTBA is considered part of a minority group (see Table 6).

Table 6 – Population Percentages by Race/Ethnicity for Benton and Franklin County



Race / Ethnicity	Benton County	Franklin County	Weighed Combined
African American/Black	1.9%	2.8%	2.2%
American Indian & Alaska Native	1.6%	2.0%	1.7%
Asian	3.5%	2.6%	3.2%
Native Hawaiian & Other Pacific Islander	0.3%	0.5%	0.3%
Persons reporting two or more races	3.6%	2.9%	3.4%
Persons of Hispanic or Latino Origin	26.4%	55.6%	35.7%
White persons not Hispanic	65.4%	38.0%	56.7%
<b>Minority Population</b>	<b>37.3%</b>	<b>66.4%</b>	<b>46.5%</b>

Source: U.S. Census Bureau, 2020 Census Results

U.S. Census Bureau QuickFacts: Benton County, Washington; Franklin County, Washington

## Economic Status

Economic status is analyzed by identifying low-income populations residing within or near BFT's service area. A **low-income person** is defined as an individual whose median household income is at or below the poverty guidelines established by the U.S. Department of Health and Human Services. Recipients are encouraged to use a locally developed threshold, such as the definition found in 49 U.S.C. 5302. For the purposes of this demographic analysis, low-income individuals are those whose family income falls at or below the federal poverty line. These low-income populations are classified as identifiable groups that live near one another.

While low-income populations are not a protected class under Title VI, BFT is committed to understanding the needs of low-income transit riders and adapting services to better serve these communities. According to the analysis, 12% of the population in BFT's PTBA lives at or below the federal poverty line (see Table 7).

Table 7 – Population Percentages by Income for Benton and Franklin County

Pop. Percentage by Income (U.S. Census)	Benton County	Franklin County	Total
Total Households	78,748	30,733	109,481
Less than \$10,000	4.9%	5.5%	5,549
\$10,000 to \$14,999	2.5%	1.0%	2,276
\$15,000 to \$24,999	5.5%	4.5%	5,714
\$25,000 to \$34,999	6.1%	7.6%	7,140
\$35,000 to \$49,999	8.9%	11.7%	10,605
\$50,000 to \$74,999	16.6%	12.8%	17,006
\$75,000 to \$99,999	14.5%	18.5%	17,104

\$100,000 to \$149,999	19.9%	18.5%	21,357
\$150,000 to \$199,999	9.4%	9.0%	10,168
\$200,000 or more	11.7%	10.8%	12,533
<b>Total Low-Income</b>	<b>12.9%</b>	<b>11.0%</b>	<b>11.9%</b>
<b>Median family income (dollars)</b>	<b>\$82,304</b>	<b>\$84,366</b>	
<b>Mean family income (dollars)</b>	<b>\$110,034</b>	<b>\$101,084</b>	

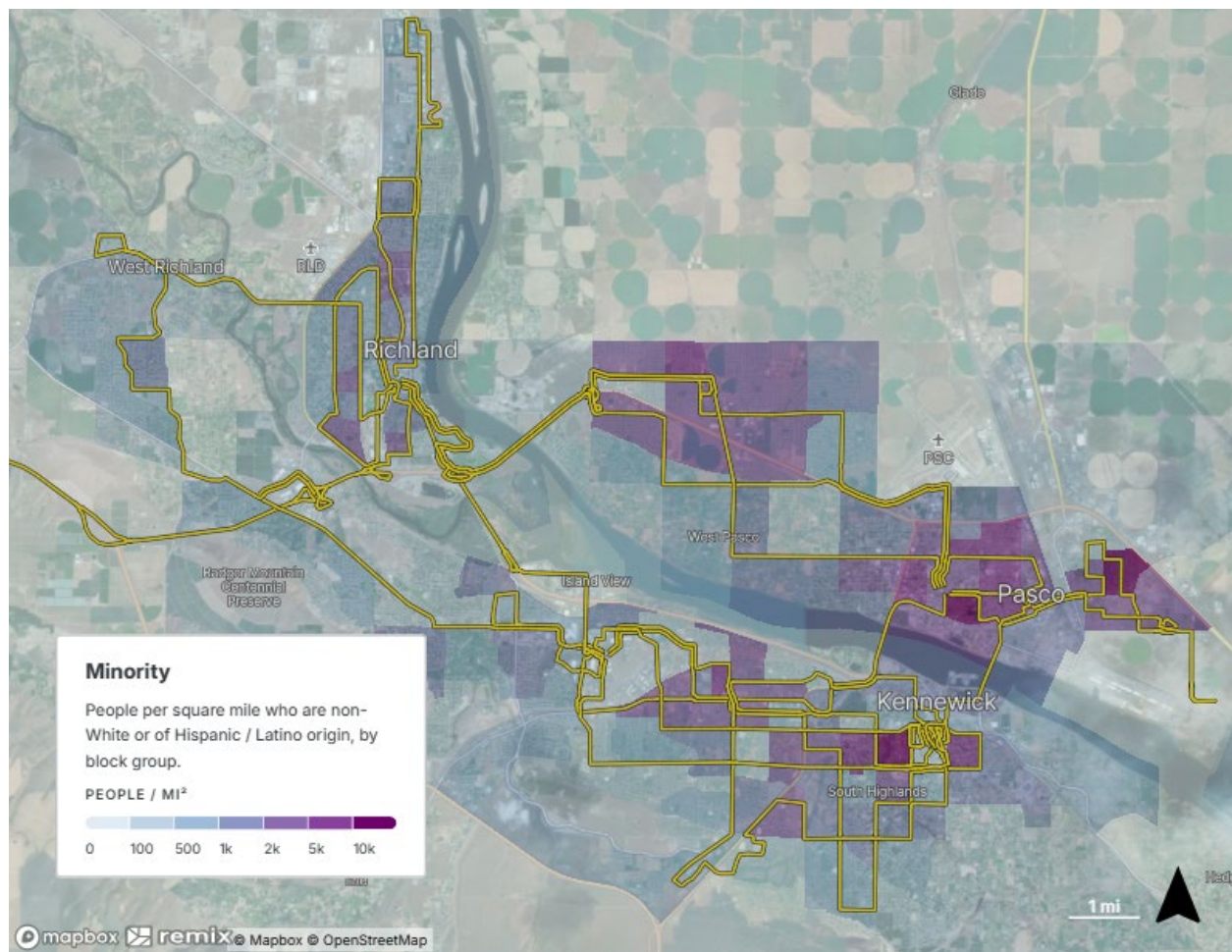
Source: U.S. Census Bureau, S1901 – Income in the Past 12 Months

Table 8 – Onboard Rider Survey Total Income Results

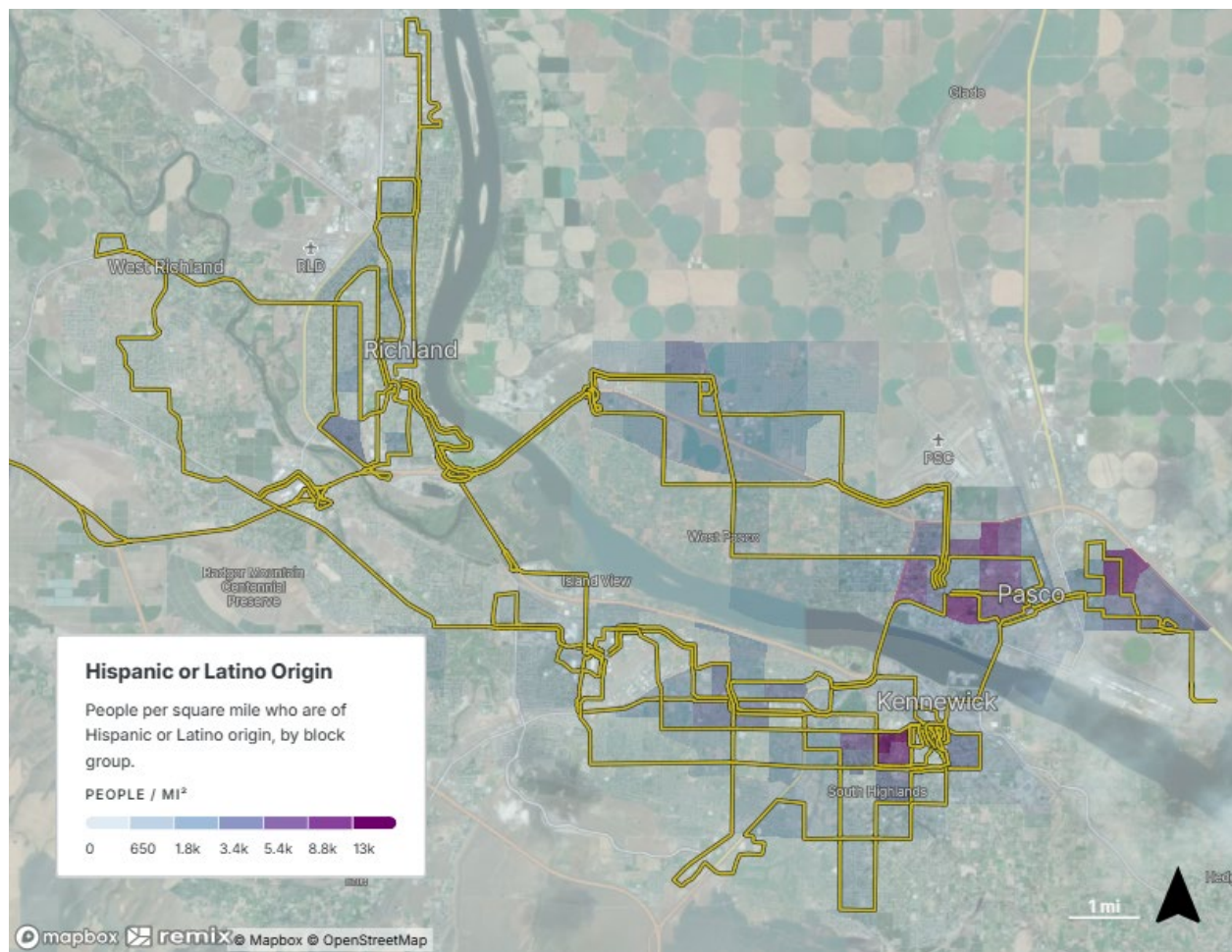
Total Income Results	Total Percentage
Total Households	744
Less than \$15,000	37%
\$15,651 to \$26,650	24%
\$26,651 to \$54,150	28%
\$54,151 to \$76,150	5%
\$76,151 to \$103,650	4%
\$103,650 and above	2%
<b>Total Low-Income</b>	<b>59%</b>

Source: Onboard Rider Survey Results- April 2025

Map 1 – BFT PTBA Minority Population Percentage by Block

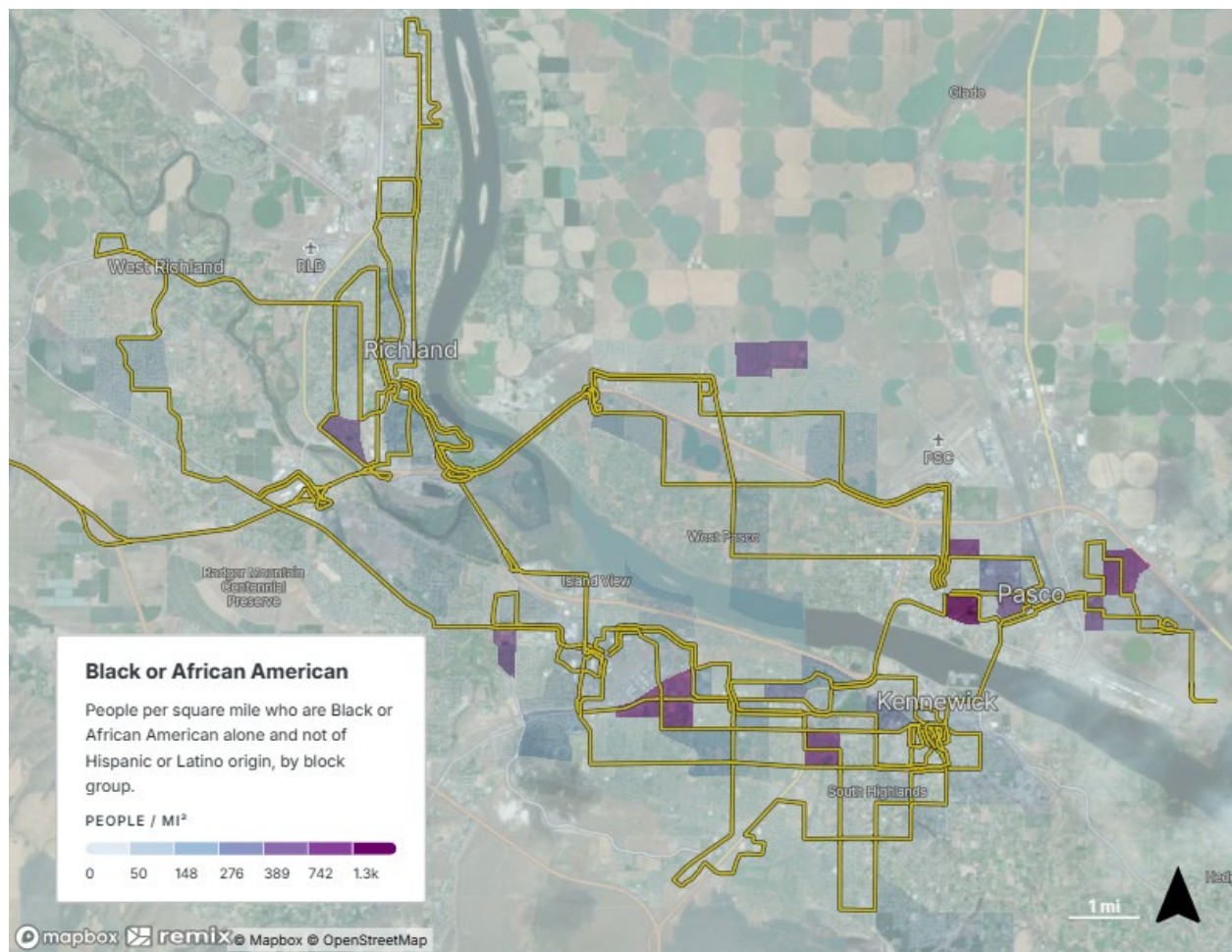


Map 2 – BFT PTBA Hispanic or Latino Population Percentage by Block Group

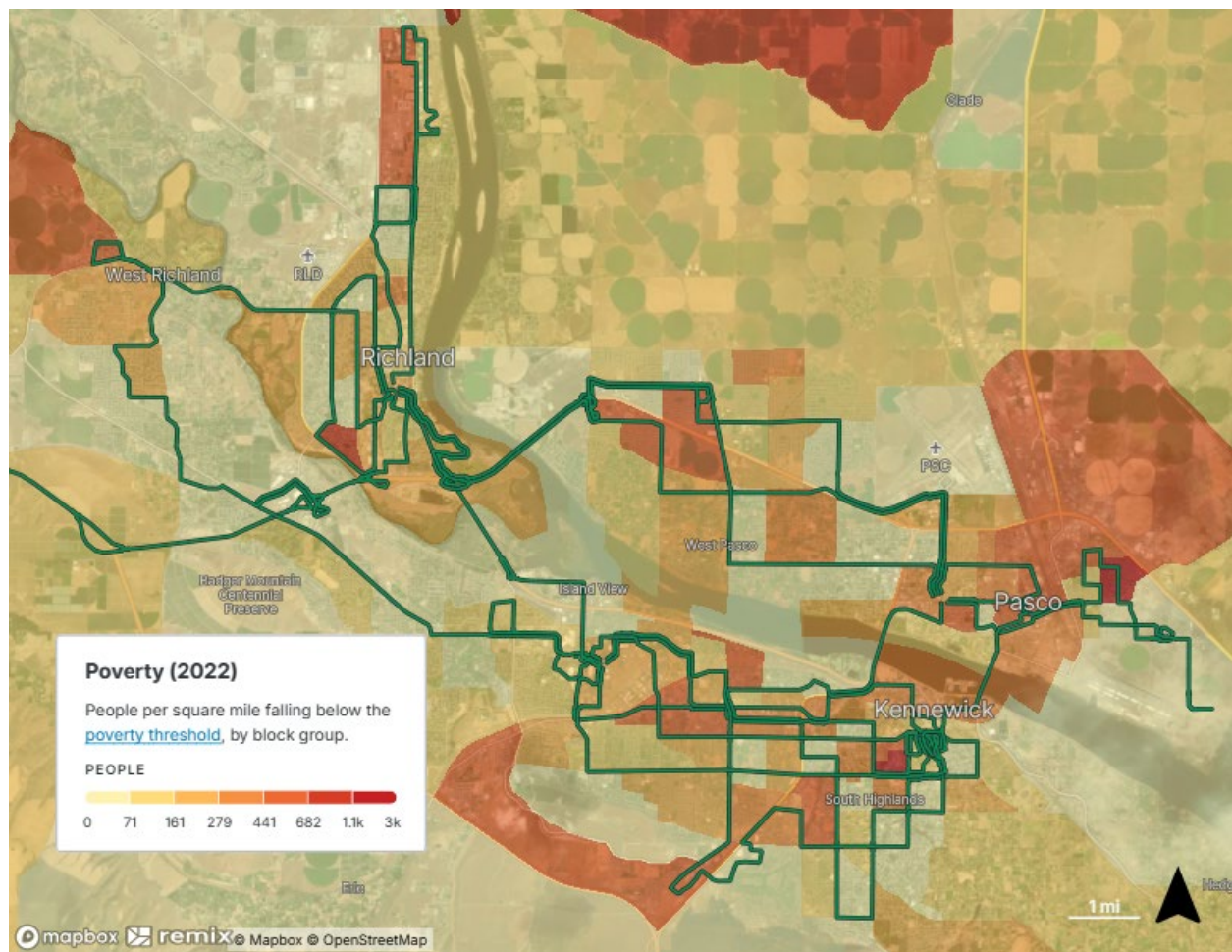


Map 3 – BFT PTBA Black or African American Population Percentage by Block Group



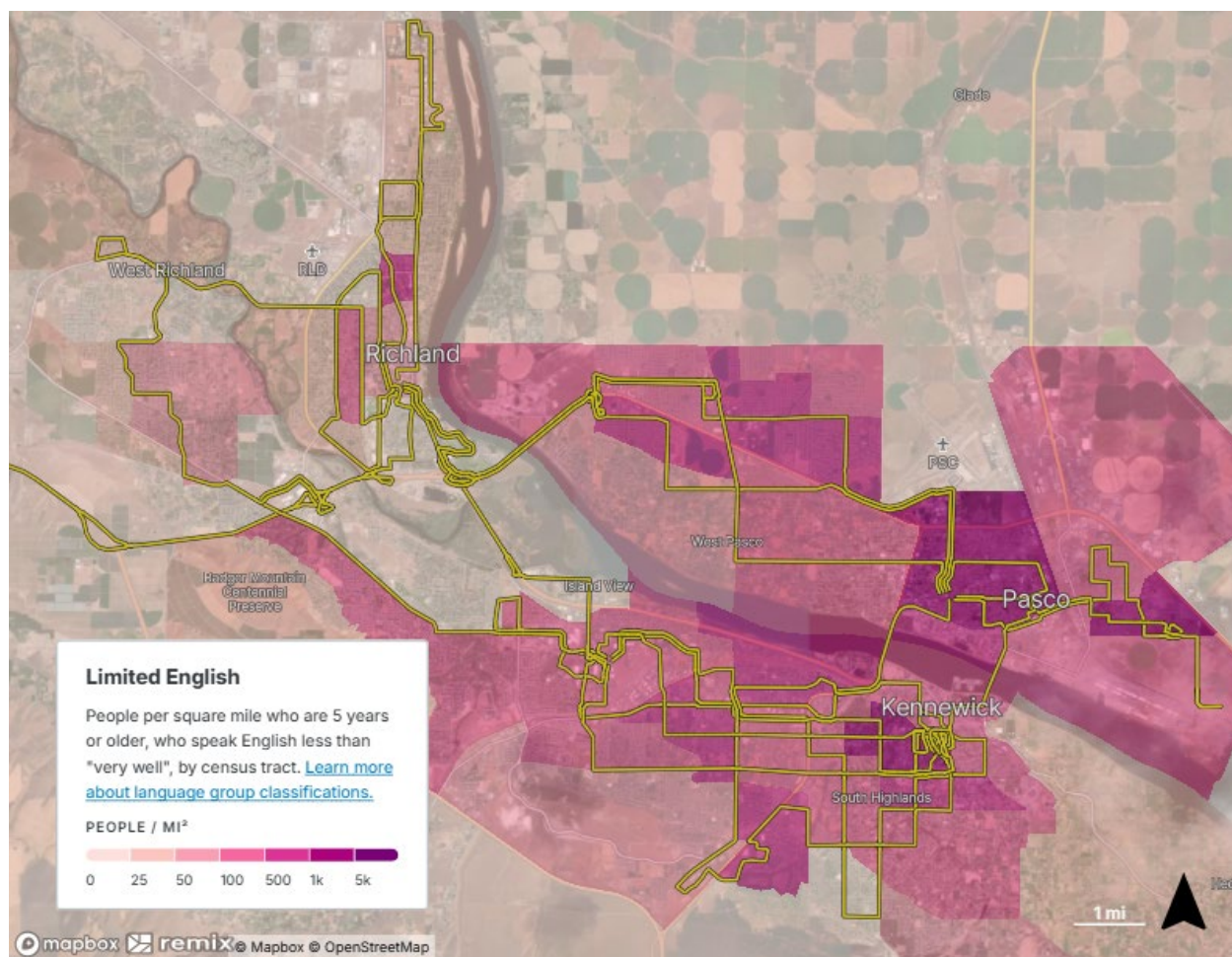


Map 4 – BFT PTBA Low-Income Population Percentage by Block Group



Map 5 – BFT PTBA Limited English Proficiency Population Percentage by Block Group





## Demographic Fare & Travel Pattern Breakdown

In April 2025, BFT conducted a comprehensive onboard survey to gain a better understanding of riders' demographic backgrounds, economic status, and travel patterns. The survey was administered over a two-week period, from April 14th to April 27th, at transit centers, transfer points, and onboard fixed-route buses. Additionally, the survey was made available online throughout the entire month of April via the BFT website and a scannable QR code that allowed riders to access the survey on their smartphones.

To ensure accessibility for Limited English Proficiency (LEP) populations, the survey was offered in both English and Spanish. Survey collection began at 5:45 a.m. each day, with efforts concluding between 6 p.m. and 10 p.m. depending on the day. More than 2,000 surveys were collected during the survey period.

The results of BFT's 2025 Onboard Survey revealed that, on average, 55% of riders self-identified as a minority (see Table 9). Additionally, 37% of respondents reported an annual income of less than \$15,650, indicating that a significant portion of BFT riders are near or below the poverty line (see Table 8).

*Table 9 – Onboard Rider Survey Race/Ethnicity Results*



Race / Ethnicity	Rider Result %
Arabic/Middle Eastern	0.5%
African American/Black	4.2%
American Indian & Alaska Native	1.1%
Asian	1.3%
Native Hawaiian & Other Pacific Islander	0.4%
People reporting two or more races	4.2%
Other races	1.1%
Persons of Hispanic or Latino Origin	42.2%
White persons not Hispanic	45.0%
<b>Minority Population</b>	<b>55.0%</b>

Source: Onboard Rider Survey Results- April 2025

**Fare Usage, Trip Purpose & Travel Patterns** Minority and low-income riders reported using a pass 31.1% and 25.5% of the time, respectively (see Table 10). Both groups were more likely to use cash for fare payment compared to the general population. Excluding the Youth Pass, the Adult Pass was the most common payment method among minority and low-income riders, followed closely by cash—reversing the 2022 trend where cash was most prevalent. Additionally, Youth and College Passes were used by a higher percentage of minority riders.

Figure 2 – Fare Payment Method by Ridership Group

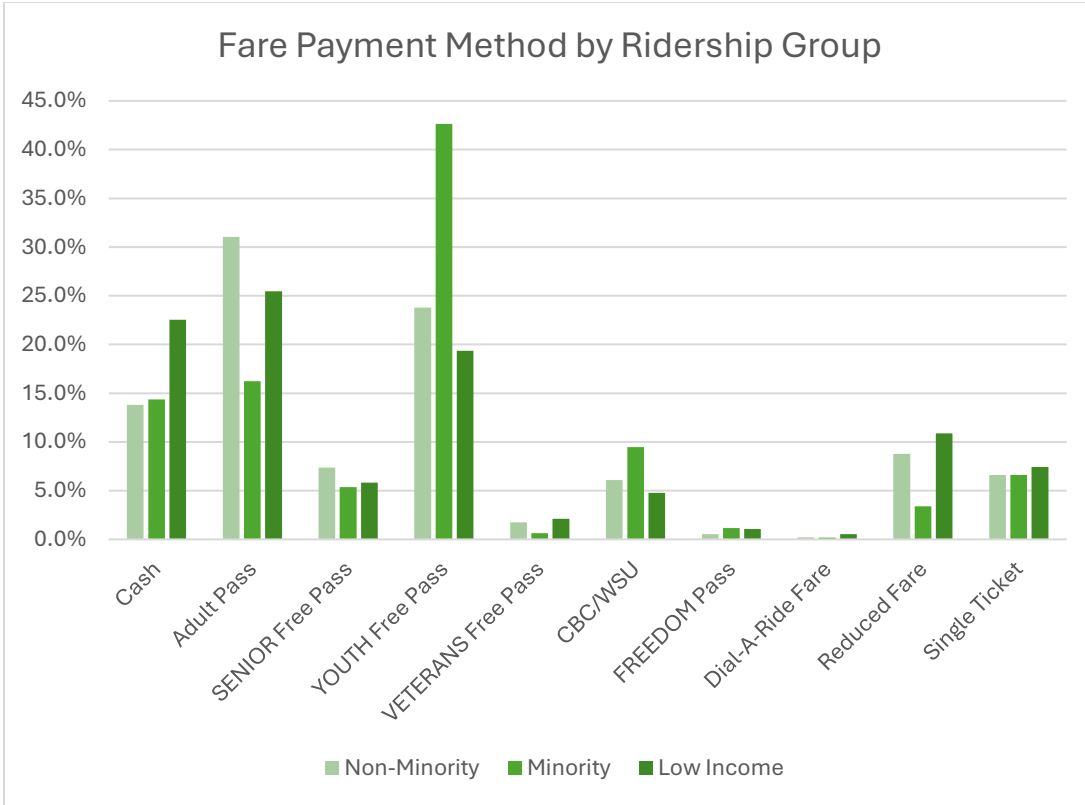
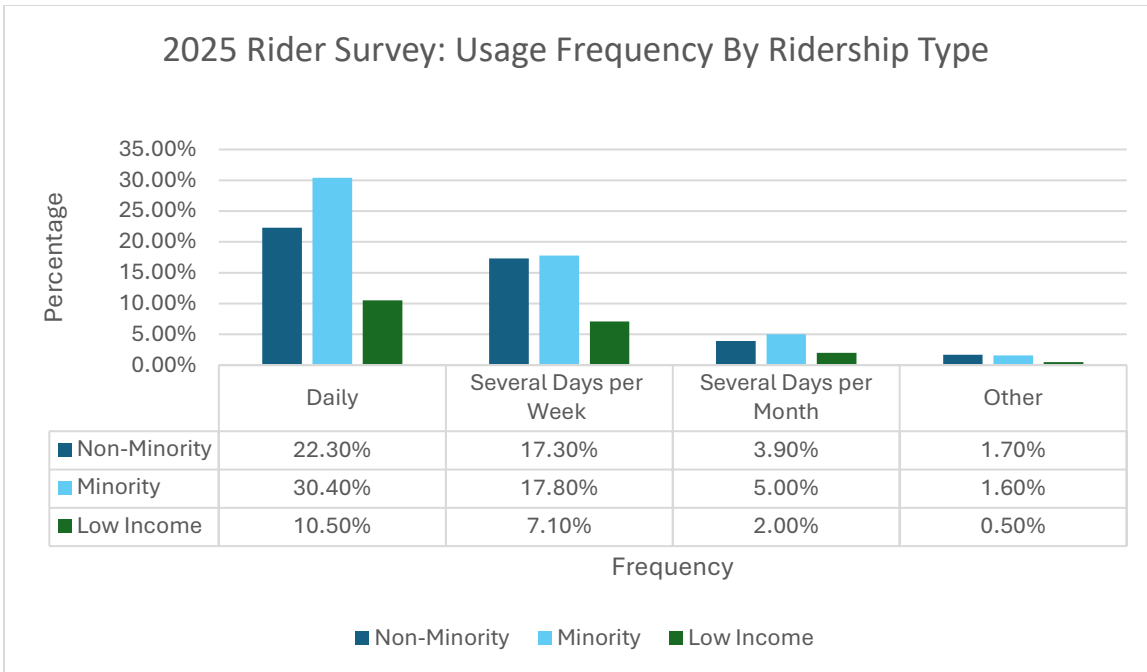


Table 10 – Fare Payment Type

Payment Type	Non-minority	Minority	Low Income
Paid Cash	13.8%	14.4%	22.5%
Adult Pass	31.1%	16.2%	25.5%
Senior Pass	7.4%	5.4%	5.8%
Youth Pass	23.8%	42.6%	19.4%
Veteran Pass	1.7%	0.6%	2.1%
CBC/WSU Pass	6.1%	9.5%	4.8%
Freedom Pass	0.5%	1.2%	1.1%
Dial-A-Ride Fare	0.2%	0.2%	0.5%
Reduced Fare	8.8%	3.4%	10.9%
Single Ticket	6.6%	6.6%	7.4%

Source: 2025 BFT Rider Survey

Figure 3 – Usage Frequency by Ridership Type



## 2.4 TITLE VI MAJOR SERVICE & FARE CHANGE POLICIES

### Overview

In accordance with the requirements set forth in FTA Circular 4702.1B §4, Chap. 4-10, BFT will conduct a Title VI analysis for all major service and fare changes, as applicable, following current FTA guidelines. This analysis will be documented and submitted to the FTA, and a copy will be maintained on file at BFT. The analysis will assess the potential impacts of proposed changes on minority and low-income populations within the BFT service area. It will also include a discussion of outreach efforts and public involvement strategies used to engage and inform minority, low-income, and Limited English Proficiency (LEP) populations throughout the decision-making process.

Equity analyses for service and fare changes will be conducted when the proposed changes exceed the quantitative thresholds outlined in BFT's Major Service Change, Disproportionate Burden, and Discriminatory Impact Policy, which was adopted by the BFT Board of Directors through Resolution 15-2013 (see Appendix B). Further revisions to this policy were made with the adoption of Resolution 26-2014 (see Appendix C). BFT will be reviewing and updating these policies in 2026.

### Major Service Change, Disproportionate Burden & Discriminatory Impact Policies

The requirement for this policy is based on FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," which became effective on October 1, 2012. The Circular mandates that any FTA recipient operating 50 or more fixed-route vehicles in peak service and serving a population of 200,000 or more must evaluate any fare changes and major service changes during the planning and programming stages to assess whether they may have a discriminatory or disproportionate impact. As of 2025, BFT operates 51 fixed-route vehicles in annual maximum service within a service area exceeding a population of 200,000. However, this number will increase to 53 fixed-route vehicles starting

June 2025.

### **BFT Major Service Change Policy**

A **major service change** is defined as any change on an individual route that results in the elimination of more than 20% of the route's revenue miles or revenue hours. Additionally, an equity analysis will be conducted when the systemwide revenue hours allocated to minority areas fall below the average share of service hours for the entire service area.

All major service changes will undergo an equity analysis, which will include an evaluation of any adverse effects. An **adverse effect** is defined as a reduction in service based on geographic or time-based factors. This can include, but is not limited to, changes in the span of service, frequency changes, elimination of route segments, re-routing, or complete route elimination.

**BFT Disproportionate Burden Policy** This policy establishes a threshold to identify when the adverse effects of a major service or fare change disproportionately affect low-income populations. If a proposed major service or fare change results in a low-income population receiving benefits 20% less or bearing adverse effects 20% more than non-low-income populations, it will be considered a **disproportionate burden**.

For routes with changes in the span of service or frequency, disproportionate burden will be evaluated by analyzing all affected routes together. For routes with segment elimination, re-routing, or route elimination, disproportionate burden will be assessed on a route-by-route basis.

**BFT Disparate Impact Policy** This policy sets a threshold to identify when the adverse effects of a major service or fare change disproportionately affect individuals based on race, color, or national origin.

If a proposed service or fare change results in a minority population receiving benefits 20% less or bearing adverse effects 20% more than non-minority populations, it will be considered a **disparate impact**.

If BFT identifies a potential disparate impact or disproportionate burden, the agency will take steps to avoid, minimize, or mitigate these effects. Following any modifications to the service plan, BFT will reanalyze the changes to ensure that the impacts are addressed. If BFT decides not to modify the proposed changes, the agency may proceed with the service or fare change only if there is a substantial legitimate justification and no viable alternatives that would have less impact on the minority population, while still meeting the agency's program goals.

## **3. 2024-2025 SERVICE MONITORING REVIEW**

Every three years, BFT conducts a comprehensive review to ensure compliance with Title VI of the Civil Rights Act, as outlined in FTA Circular 4702.1B. This review evaluates the implementation of system-wide service standards and policies to ensure equitable transit services for minority and low-income populations. This section presents the analysis of BFT's fixed-route network to determine whether the adopted standards and policies have been consistently applied and met.

To conduct a meaningful assessment, BFT selects a representative sample of both minority and non-minority routes, focusing on areas primarily served by each. The review includes all fixed routes, excluding demonstration and overload/tripper services. Minority and non-minority routes are compared to identify

any disparities in how system-wide service standards and policies are applied.

The FTA defines a minority route as one in which at least one-third of its total revenue mileage operates through Census blocks, block groups, or traffic analysis zones where the minority population exceeds the average for the transit service area. BFT refines this by identifying a route as a minority route if the population within a ¼-mile buffer of the route exceeds the average minority population of the service area. Based on this definition, 13 of BFT's 20 fixed routes qualify as minority routes.

To ensure compliance with the service monitoring requirements outlined in FTA Circular 4702.1B, BFT followed these key steps:

- Analyzed each route to identify any potential disproportionate impacts across the evaluated criteria.
- Calculated system-wide averages for service levels, vehicle assignments, and amenity distribution.
- Classified each fixed route as either a minority or non-minority route.
- Conducted an inventory of service characteristics and amenities for all routes, distinguishing between minority and non-minority routes.
- Recorded any required corrective actions based on the findings of the analysis.

### **3.1 SERVICE STANDARDS MONITORING REVIEW**

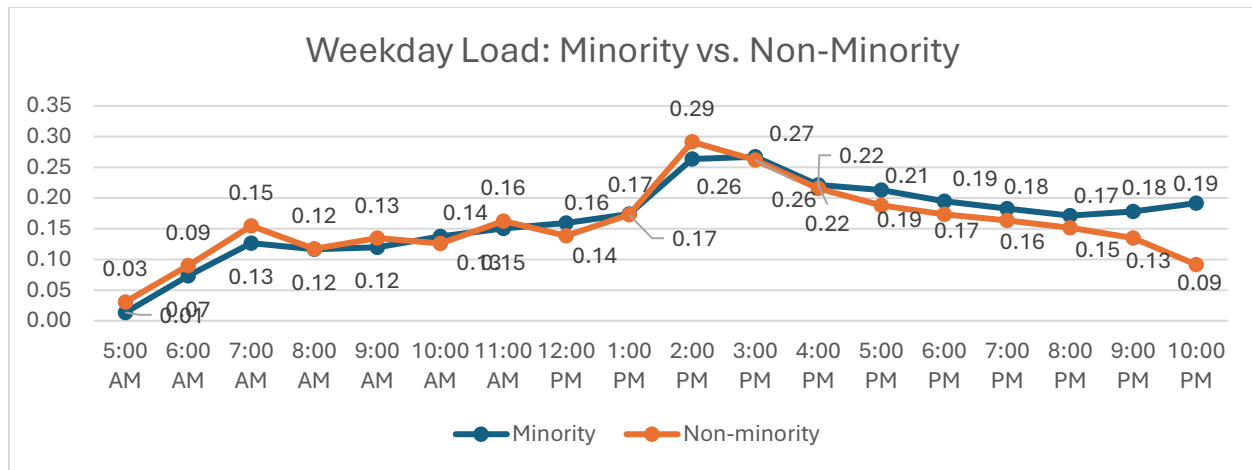
BFT is required to monitor the application and adherence to adopted system-wide service policies on a triennial basis. The data, tables, figures, and maps provided in this section exemplify how BFT assesses service standards as they pertain to groups identified by race, color, or national origin. Data used in this service monitoring review was collected during October 2024, BFT's highest ridership month.

#### ***Vehicle Load***

**Fixed-Route Service Standard** BFT has adopted a load standard of 1.25 for its fixed-route service during the peak operating period and should not exceed the vehicles' achievable capacities. A 1.25 load factor indicates that all seats are taken and no more than 25% of riders are standing. If it is observed that a trip or route is consistently reaching or exceeding a 1.25 load standard, steps will be taken to add frequency or an overload service to minimize overcrowding.

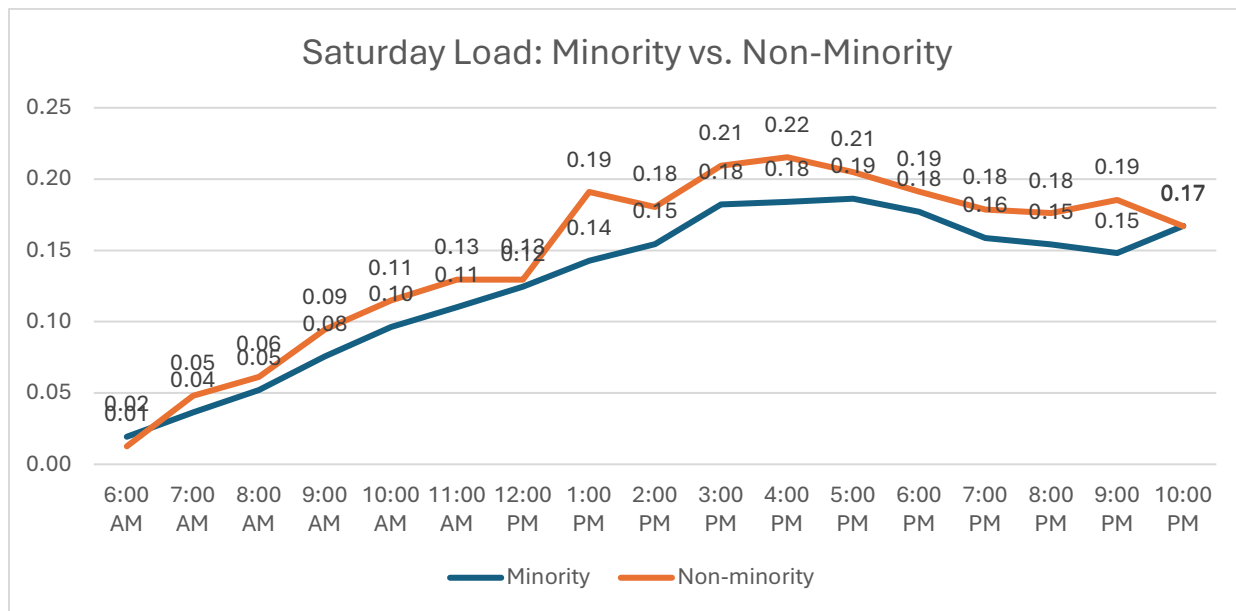
**Analysis** The average load on weekday trips on all routes occurring in October 2024 did not consistently exceed a 1.25 load factor at any point during a given service day. Minority and non-minority routes are busiest during the PM peak (2 p.m. to 5 p.m.), with both having an average load factor of 0.24 during this span (Figure 4) All routes operated without exceeding a 1.25 load factor on a consistent basis and it was concluded that no apparent or intentional disparity exists between minority and non-minority routes in terms of BFT's load factor standard.

*Figure 4– Average Weekday Load on Minority & Non-minority Routes by Time of Day*



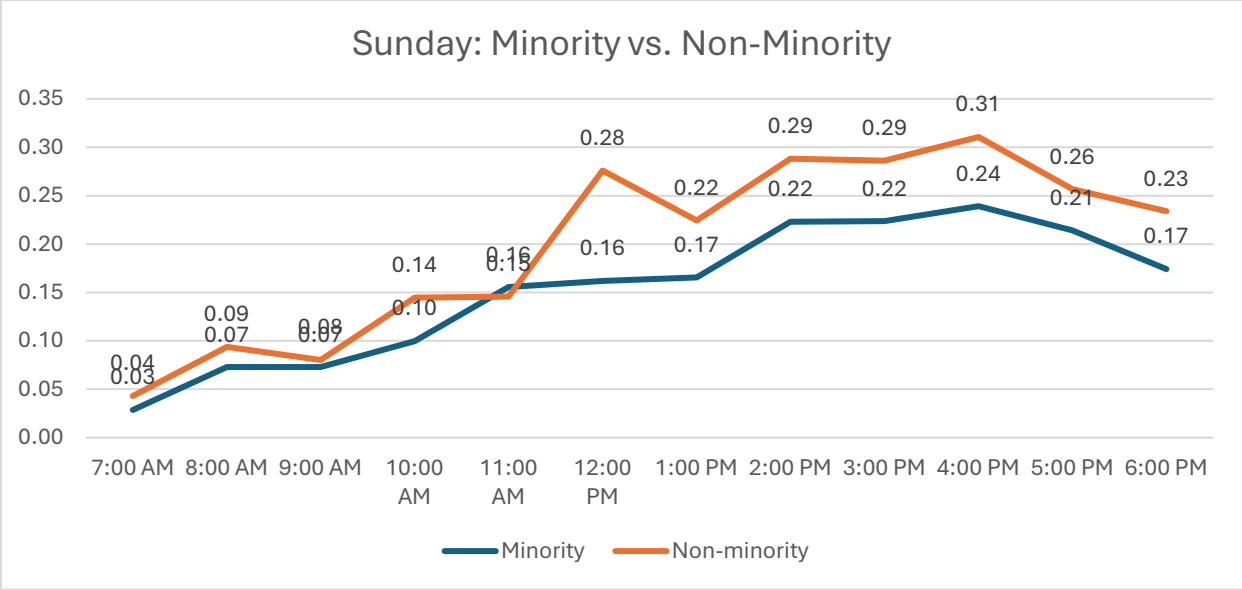
Saturday trips were observed to have a lower average load, with minority and non-minority routes experiencing an average PM peak load factor of 0.18 and 0.21 respectively (Figure 5). The PM peak ranged from 3:00 p.m. to 6:00 p.m. on Saturdays.

Figure 5 – Average Saturday Load on Minority & Non-minority Routes by Time of Day



Sunday trips saw minority and non-minority routes experiencing an average PM peak load factor of 0.20 and 0.27 respectively (Figure 6), with the PM peak ranging from 12:00 p.m. to 6 p.m.

Figure 6 – Average Sunday Load on Minority & Non-minority Routes by Time of Day



Load factor will continue to be monitored to determine if more fixed-route resources are needed on certain routes at certain times of the day.

**Vehicle Headway**

**Fixed-Route Service Standard** BFT adjusts route headways based on ridership demand and market potential, using factors such as load levels, route productivity, and area development trends to guide service planning. Most vehicle headways currently range from 15 to 60 minutes, with the exception of Route 170, which operates every 60 minutes during peak hours and every 120 minutes during off-peak times. High-demand commercial corridors—such as Court Street in Pasco and Clearwater Avenue in Kennewick—are served by Metro Routes 1 and 3, which provide 15-minute all-day frequency. These routes were introduced in June 2021 to support areas with consistently high transit activity.

**Analysis** No apparent or intentional disparity between average headways for minority and non-minority routes was determined. On weekdays, minority and non-minority routes have an average headway of 36 and 34 minutes, respectively (Table 12). On Saturdays, minority and non-minority routes have an average headway of 40 and 34 minutes, respectively (Table 14). Minority service ends an average of 16 minutes later weekdays. On Sundays, all routes run at a headway of 30 minutes (Table 16). Schedules used to determine average headways are from December 2024.

Table 11 – Weekday Headway by Route

Weekday By Route							
Route	Service Begins	AM Peak Headway	Midday Headway	PM Peak Headway	Late	Service Ends	Approx. Operating Hours



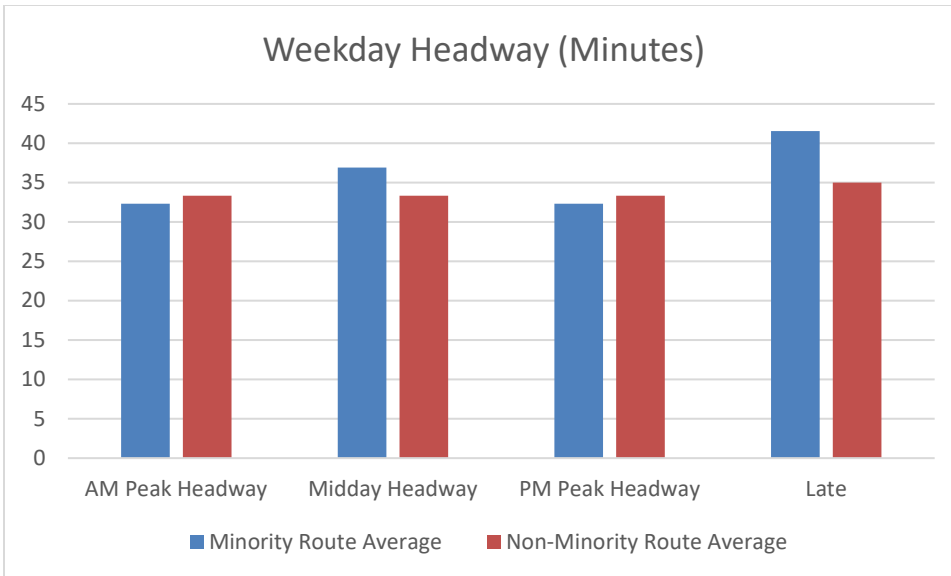
1	6:00 AM	15	15	15	30	10:23 PM	16.4
3	5:45 AM	15	15	15	30	9:50 PM	16.1
10	6:15 AM	60	60	60	60	8:02 PM	13.8
20	6:15 AM	30	30	30	30	10:07 PM	15.9
25	5:45 AM	30	30	30	30	8:04 PM	14.3
26	6:00 AM	20	20	20	30	9:53 PM	15.9
40	6:15 AM	30	30	30	30	8:07 PM	13.9
41	6:00 AM	60	60	60	60	8:11 PM	14.2
42	6:00 AM	30	30	30	60	9:46 PM	15.8
47	6:00 AM	30	30	30	60	9:41 PM	15.7
48	6:00 AM	30	30	30	60	9:51 PM	15.9
50	8:00 AM	30	30	30	30	8:52 PM	12.9
64	6:00 AM	30	30	30	30	10:05 PM	16.1
65	6:00 AM	30	30	30	30	10:11 PM	16.2
67	6:00 AM	30	30	30	30	9:45 PM	15.8
123	5:45 AM	30	30	30	30	10:17 PM	16.5
170	5:17 AM	60	120	60	60	8:50 PM	15.6
225	5:45 AM	30	30	30	30	10:19 PM	16.6
268	5:45 AM	30	30	30	30	8:18 PM	14.6

\*Minority  
Routes

Table 12 – Average Vehicle Headway by Route

	AM Peak Headway	Midday Headway	PM Peak Headway	Late	Service Ends	Approx. Operating Hours
System Average	33	36	33	39	9:23 PM	15.4
Minority Route Average	32	37	32	42	9:29 PM	15.6
Non-Minority Route Average	33	33	33	35	9:12 PM	14.9

Figure 7 – Average Weekday Headway by Minority & Non-minority Routes



*Table 13 – Saturday Vehicle Headway by Route*

Saturday By Route							
Route	Service Begins	AM Peak Headway	Midday Headway	PM Peak Headway	Late	Service Ends	Approx. Operating Hours
1	6:50 AM	20	20	20	30	10:24 PM	15.6
3	7:00 AM	15	15	15	30	9:50 PM	14.8
10	7:15 AM	60	60	60	60	8:02 PM	12.8
20	7:15 AM	30	30	30	30	10:07 PM	14.9
25	6:45 AM	30	30	30	30	7:04 PM	12.3
26	7:00 AM	20	20	20	30	9:53 PM	14.9
40	7:15 AM	30	30	30	30	8:06 PM	12.9
41	7:00 AM	60	60	60	60	8:11 PM	13.2
42	7:00 AM	30	30	30	60	9:49 PM	14.8
47	7:00 AM	30	30	30	60	9:41 PM	14.7
48	7:00 AM	30	30	30	60	9:52 PM	14.9
50	8:00 AM	30	30	30	30	8:52 PM	12.9
64	7:00 AM	30	30	30	30	10:05 PM	15.1
65	7:00 AM	30	30	30	30	10:13 PM	15.2
67	7:00 AM	30	30	30	30	9:43 PM	14.7
123	6:45 AM	30	30	30	30	10:17 PM	15.5
170	7:05 AM	120	120	120	120	8:50 PM	13.8
225	6:45 AM	30	30	30	30	10:19 PM	15.6
268	6:45 AM	30	30	30	30	8:18 PM	13.6

\*Minority Routes

Table 14 – Saturday Average Vehicle Headway

	AM Peak Headway	Midday Headway	PM Peak Headway	Late	Service Ends	Approx. Operating Hours
System Average	36	36	36	43	9:20 PM	14.3
Minority Route Average	37	37	37	46	9:29 PM	14.5
Non-Minority Route Average	33	33	33	35	9:02 PM	13.9

Figure 8 – Average Saturday Headway by Minority & Non-minority Routes

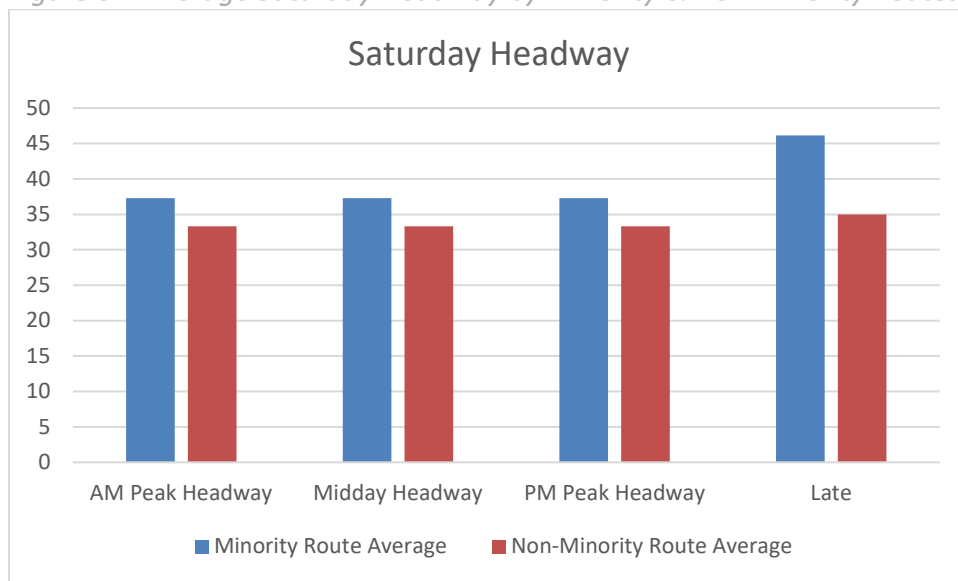


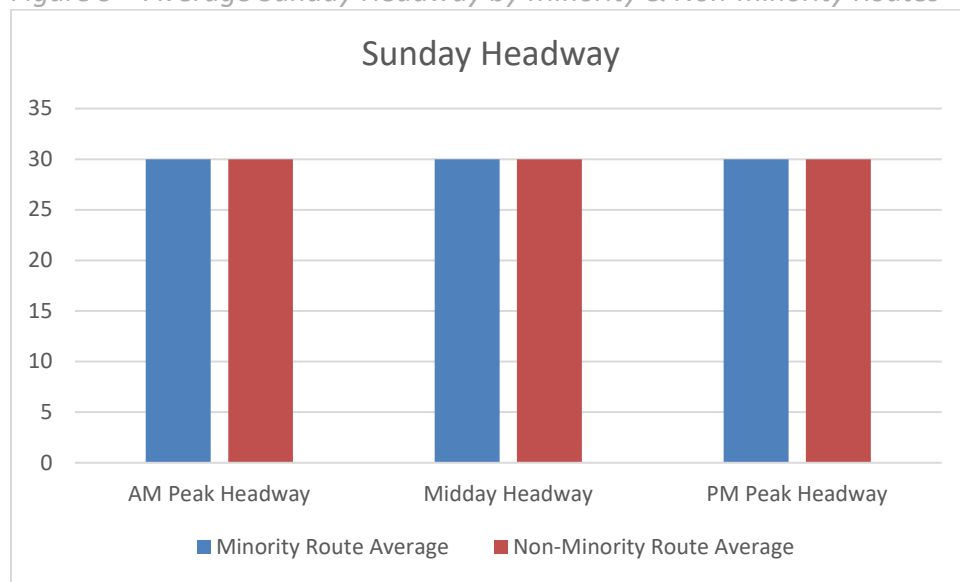
Table 15 – Sunday Vehicle Headway by Route

Sunday By Route						
Route	Service Begins	AM Peak Headway	Midday Headway	PM Peak Headway	Service Ends	Approx. Operating Hours
1	8:00 AM	30	30	30	6:35 PM	10.6
3	8:00 AM	30	30	30	6:21 PM	10.4
40	8:00 AM	30	30	30	6:23 PM	10.4
47	8:00 AM	30	30	30	6:41 PM	10.7
64	8:00 AM	30	30	30	6:18 PM	10.3
123	8:00 AM	30	30	30	6:45 PM	10.8
225	8:00 AM	30	30	30	6:49 PM	10.8
*Minority Routes						

Table 16 – Sunday Average Vehicle Headway

Routes	AM Peak Headway	Midday Headway	PM Peak Headway	Late	Service Ends	Approx. Operating Hours
System Average	30	30	30	30	6:33 PM	10.6
Minority Route Average	30	30	30	30	6:31 PM	10.5
Non-Minority Route Average	30	30	30	30	6:45 PM	10.8

Figure 9 – Average Sunday Headway by Minority & Non-minority Routes



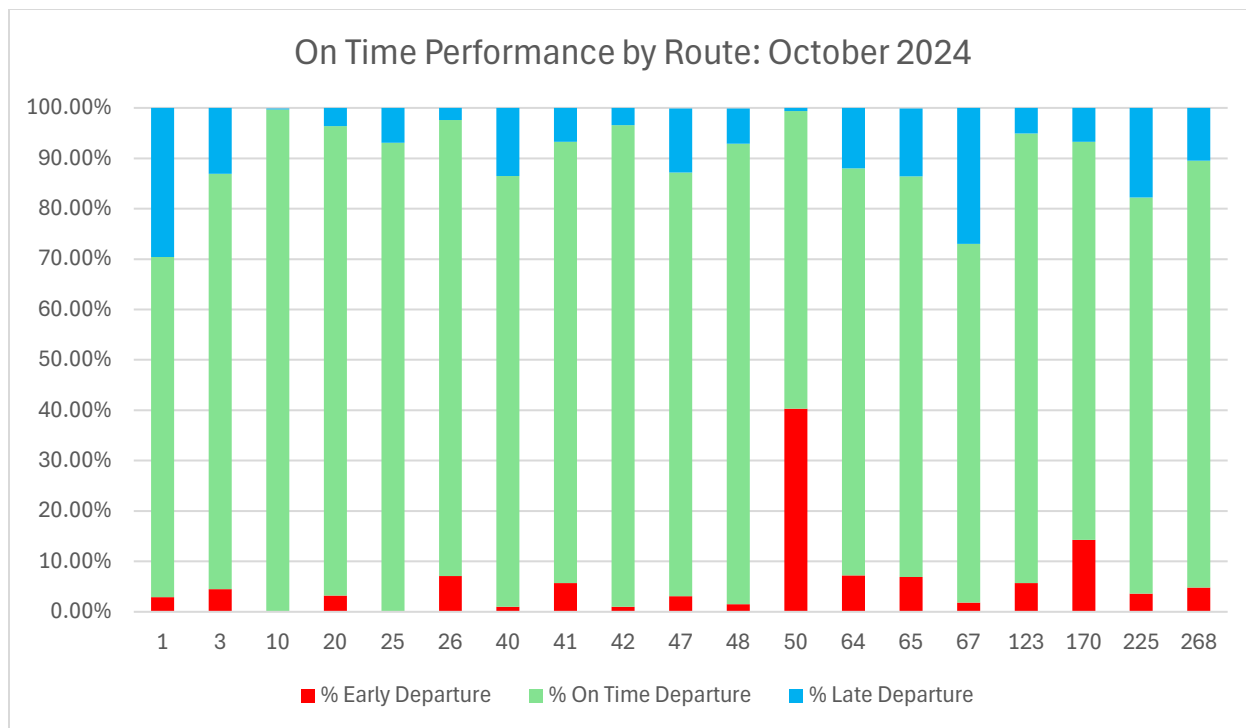
### On-Time Performance

**Fixed-Route Service Standard** On-time performance standards for fixed-route service vary by mode. Currently, a fixed-route bus is considered late if it departs more than five (5) minutes after its scheduled time or early if it departs more than 59 seconds prior to its scheduled departure.

**Analysis** An analysis of BFT’s fixed route on-time performance for October 2024 revealed that 82.8% of all sampled trips departed from scheduled timepoints on time. Of the remaining trips, 4.9% departed early and 12.3% departed late.

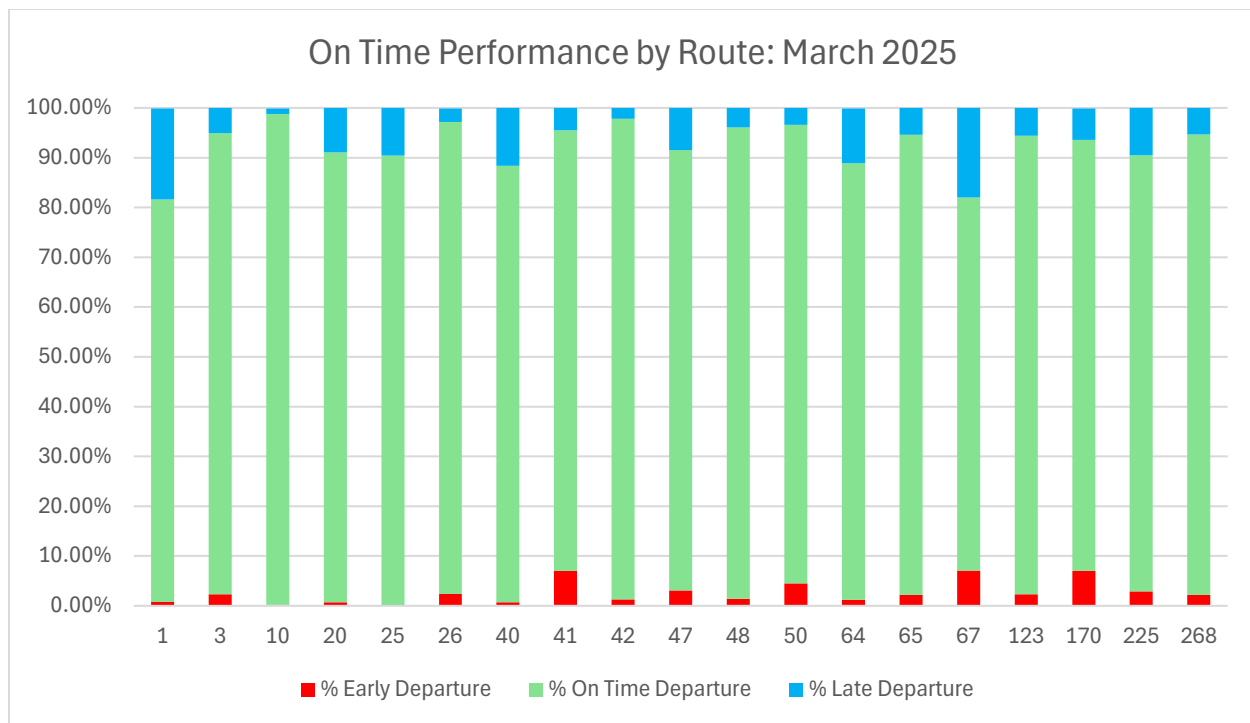
When disaggregated by route classification, minority routes reported an on-time performance rate of 80.6%, while non-minority routes achieved a higher rate of 89.2%. The lower performance among minority routes was directly linked to ongoing construction activities on Broadmoor Boulevard in Pasco and the Pioneer Memorial Bridge on Highway 395 during the reporting period.

Figure 10 – On-time Performance by Route – October 2024



A follow-up review of data collected in March 2025 (Figure 11)—after the conclusion of the construction—indicates a significant performance improvement. On-time performance for minority routes increased by 7.6 percentage points to 88.3%, while non-minority routes improved to 93.0%. Despite the continued higher performance of non-minority routes, it is important to note that they comprise only 24% of the total data points. Minority routes represent the remaining 76%, with METRO Routes 1 and 3—two of the system’s busiest and most operationally dynamic routes—accounting for 30.9% of minority route data points. Route 50, which experienced a 40.3% rate of early trips, is a newly implemented route whose schedules have been adjusted to improve OTP.

*Figure 11 – On-time Performance by Route – March 2025*



*Table 17 – On-time Performance by Minority & Non-minority Routes – October 2024*

October 2024			
Routes	% On time	% Early	% Late
System Average	82.8%	4.9%	12.3%
Minority Route Average	80.6%	4.2%	15.1%
Non-minority Route Average	89.3%	7.0%	3.7%

*Table 18 – On-time Performance by Minority & Non-minority Routes – March 2025*

March 2025			
Routes	% On time	% Early	% Late
System Average	89.40%	2.30%	8.30%
Minority Route Average	88.30%	2.50%	9.20%
Non-minority Route Average	93.00%	1.90%	5.10%

To further enhance reliability, BFT has initiated efforts to revise scheduled time points to reflect actual operating conditions throughout the day. Historically, fixed route schedules maintained static running times, regardless of peak or off-peak demand. In response, BFT partnered with CSched to utilize the HASTUS ATP module to conduct an in-depth analysis of timepoint adherence during peak periods. Based on this analysis, timepoint adjustments are being

implemented to better align with observed travel patterns. Additionally, scheduling staff are streamlining internal processes to support more responsive and efficient schedule updates moving forward.

The following tables indicate OTP levels for low and not-low-income routes. Again, with a comparison of October 2024 and March 2025, the on-time percentage improved by 6.3% with a reduction in both early and late arrivals by 2.1% and 4.9% respectively.

*Table 19 – On-time Performance by Low & Not Low-Income Routes – October 2024*

October 2024			
Routes	% On time	% Early	% Late
System Average	82.82%	4.92%	12.26%
Low-Income Route Average	81.98%	4.42%	13.60%
Not Low-Income Route Average	85.52%	6.56%	7.92%

*Table 20 – On-time Performance by Low & Not Low-Income Routes – March 2025*

March 2025			
Routes	% On time	% Early	% Late
System Average	89.40%	2.34%	8.26%
Low-Income Route Average	88.32%	2.35%	8.65%
Not Low-Income Route Average	93.15%	2.31%	6.92%

## Service Availability

**Fixed-Route Service Policy Statement** BFT allocates transit service according to observed ridership demand, population patterns, and land use characteristics. The agency is committed to ensuring that all residents within the Public Transportation Benefit Area (PTBA) have access to transit, either through scheduled fixed-route service or the CONNECT On-Demand service.

*Table 21 – Population within ½ a Mile of Fixed-Route Service*

Name	Total Population within 1/2 Mile of Transit 2025	Total Population	Percent Total Population 2025	% Total Population within 1/2 Mile of Transit 2018	Minority Population within 1/2 miles of Transit 2025	% Minority population within 1/2 miles of Transit 2025
<b>Pop. within ½ Mile of Transit</b>	208,305	275,388	75.60%	72%	79,553	79%

*\*Source: Washington State Office of Financial Management, SAEP*

**Analysis** Using Washington State Office of Financial Management 2020 population data, it was concluded

that an estimated 72% of the total population of BFT's PTBA is located within ½ a mile of a fixed route. Minority populations experience slightly better service availability in that 79% of the minority population lives within ½ a mile of a fixed route (Table 21). Based on this information, it was concluded that no apparent or intentional disparity exists between minority and non-minority routes in terms of service availability.

### Distribution of Transit Amenities

**Service Policy Statement** Transit amenities, including facilities, are placed where current or anticipated demand justifies the investment. Prior to 2020, amenity placement was guided by productivity standards outlined in BFT's Stop Guidelines and Amenities Policy. Currently, each stop is categorized primarily based on average weekday ridership, which determines the minimum recommended amenities according to daily boarding figures. Additional factors considered include whether the stop is served by a Metro (high-frequency) route, whether passengers typically experience longer wait times at the location, and any physical or regulatory constraints—such as right-of-way limitations, property owner objections, or jurisdictional restrictions—that may prevent the installation of designated amenities.

Transit amenities are assigned based on groups and frequency of use as follows:

- **Basic:** Fewer than five (5) average weekday boardings
- **Enhanced:** Five (5) to fifteen (15) average weekday boardings
- **Shelter:** More than fifteen (15) average weekday boardings

BFT's service area spans multiple jurisdictions, including six cities across two counties. Each jurisdiction has its own procedures, development patterns, and standards, as well as varying approaches to right-of-way (ROW) permitting and other regulatory processes required for BFT to perform work within these areas. Due to inconsistent development along fixed routes, policies for distributing transit amenities cannot always be applied uniformly across the service area. Nonetheless, BFT is committed to ensuring an equitable distribution of transit amenities to the best of its ability (see Table 22).

*Table 22 – Amenities Distribution by Stop Ridership (Average Weekday Boardings)*

Amenity	Basic <5 daily boardings	Enhanced 5-15 daily boardings	Shelter >15 daily boardings
No Parking Restriction	Recommended at all stops		
ADA 5' x 8' Landing Pad & 3' x 5' Clear Floor Space	Required at all stops, unless reasonably justified		
Bus Stop Sign on Separate Pole	Recommended at all stops		
Lean Rail	Optional	Optional	Optional
Bench	Optional	Recommended	Provide
Shelter	Optional	Optional	Recommended
Display Case	Optional	Optional	Optional
Lighting	Optional	Optional	Recommended
Trash Can	Optional	Recommended	Provide
Rider Information Panel	Optional	Recommended	Provide
Bicycle Rack*	Optional	Optional	Optional



Bicycle Repair Station*	Optional	Optional	Optional
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\* Bicycle Infrastructure recommended in locations near multi-use/bike trails

**Distribution of Fixed-Route Transit Amenities Analysis** As of May 7, 2025, BFT’s fixed-route system consists of 915 stops—879 are posted stops, while 36 are designated as flag stops. Among these, 81 stops feature shelters (each with a bench), 78 have benches without shelters, and 2 locations include two-seater benches equipped with built-in lighting. Additionally, 162 stops are equipped with garbage cans, 38 of which offer no other amenities. Flag stops are locations without a posted sign where riders can signal a bus to stop. BFT is actively phasing out flag stops by either installing permanent signage or removing the stop if it is in an impractical location with low ridership. Table 23 outlines amenities by route; please note that amenities may be counted more than once if multiple routes serve the same stop, and the totals include transit centers and transfer points.

Upon further analysis of current amenity locations, it was concluded that no apparent or intentional disparity exists between minority and non-minority routes relative to BFT’s distribution of transit amenities.

*Table 23 – Amenities by Route*

Route	Total Stops*	Posted Stops	Flag Stops	Shelters	Benches (includes shelter benches)	Two-Seater Bench	Garbage Cans	Length of Route (mi.)	Average Stop Spacing (ft.)
1	62	62	0	10	22	1	21	28.7	2567.4
3	46	43	3	11	11	0	23	11.6	1332.4
10	39	38	1	3	4	0	5	13.8	1863.5
20	47	47	0	6	12	0	15	13.8	1587.2
25	29	29	0	2	2	0	2	7.0	1280.4
26	48	45	3	10	15	0	11	11.9	1312.9
40	50	50	0	12	18	0	18	14.3	1510.2
41	125	119	6	8	10	0	13	29.3	1179.3
42	61	60	1	9	13	0	14	14.1	1218.3
47	97	93	4	12	23	0	24	27.5	1495.3
48	57	55	2	4	9	0	11	16.1	1491.1
50	20	20	0	3	3	0	5	6.2	1632.7
64	39	38	1	3	6	0	6	11.5	1450.0
65	49	48	1	5	10	0	9	13.4	1442.9
67	51	50	1	8	14	0	12	28.7	2567.4
123	101	94	7	9	21	1	17	11.6	1332.4
170	39	31	8	5	5	0	5	13.8	1863.5
225	72	70	2	10	15	0	15	13.8	1587.2
268	62	60	2	7	11	0	11	7.0	1280.4

*Note: Numbers do not reflect transit centers*

\*Stops serving multiple routes are double counted, total stops are higher than actual total stop count

*Table 24 – Amenity Distribution by Minority & Non-minority Routes*

Routes	Total Stops*	Shelters*	Benches*	Garbage Cans*	Average Bus Stop Spacing (ft.) **
System	1,162	85	146	153	1831.4
Minority Routes	704	54	87	95	1660.6
Non-minority Routes	458	31	59	58	2124.1

\*Stops serving multiple routes are double counted, total stops are higher than actual total stop count.

\*\* Route 170 excluded

***Distribution of Transit Amenities (Transit Centers/Park & Rides) Analysis*** Major transit centers and park-and-ride facilities are strategically located throughout BFT's service area, based on the planning considerations made during their construction phases. These centers and park-and-rides are equipped with a fair distribution of amenities. Considering the varying modes of service, safety and operational requirements, and ridership levels, amenities such as benches, shelters, and lighting are provided based on specific needs. Select facilities also offer bike racks and lockers, although bike lockers are being gradually phased out. Due to the COVID-19 pandemic, public restrooms at facilities where BFT Customer Service staff operate were temporarily closed and remain unavailable as of May 2025. A detailed breakdown of the amenities provided at transit centers and park-and-ride facilities can be found in Tables 25 and 26.

*Table 25 – Transit Center Amenities*

Transit Center	Passenger Services	Security	Public Restroom	Bicycle Locker/ Rack	Minority Group Designation
Three Rivers Transit Center	Yes	No	No	Yes	Non-minority
Knight St Transit Center	No	No	No	Yes	Non- minority
22 <sup>nd</sup> Street Transit Center	No	No	No	Yes	Minority
Columbia Park Trail MOA	Yes	Yes	Yes	Yes	Non- minority
West Richland Transit Center	No	No	Yes	No	Non- minority
Dayton Transfer Point	No	No	No	Yes	Minority
Queensgate Transit Center	No	Yes	No	Yes	Non-minority
Stacy Avenue Transit Center	No	No	No	Yes	Minority

Ed Frost Transit Center	Defunct	Minority
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*Table 26 – BFT Owned or Leased Park & Rides Within Service Area (Amenities)*

Park & Ride	Location	Lot Capacity	Shelter	Public Restroom	Bicycle Locker/Rack	Minority Group Designation
Ed Frost Transit Center (Defunct)	Kennewick	96	Yes	No	Yes	Minority
Tulip Lane Park & Ride	Richland	139	Yes	No	Yes	Non-minority
22nd Ave Transit Center	Pasco	50	Yes	No	Yes	Minority
Knight Street Transit Center	Richland	50	Yes	No	Yes	Non-minority
Stacy Avenue Transit Center	Prosser	20	Yes	No	Yes	Minority
Richland Wye Park & Ride	Richland	250	No	No	Yes	Non-minority
HAPO Center Park and Ride	Pasco	180	No	No	No	Minority
Port of Benton	Richland	350	No	No	No	Non-minority
West Richland Transit Center	West Richland	154	Yes	Yes	No	Non-minority

## Vehicle Assignment

**Service Policy Statement** Fixed route vehicles are assigned based on operational requirements of the route such as height/size, route capacity, and turning radius. Dispatch completes bus assignments monthly and assigns specific buses to specific blocks. Any buses held down for maintenance or other reasons are replaced daily with buses from the spare list. Drivers are given a bus number when they check in with Dispatch. Vehicles will be assigned to routes based on ridership capacity and anticipated need for capacity. Same-size vehicles are used interchangeably when daily route assignments are made. Thus, newer vehicles circulate in minority and non-minority neighborhoods alike. Age of fleet is also taken into consideration when assigning vehicles to different routes/blocks.

**Analysis** Fixed route vehicle assignment data from October 2024 concluded no disparity in how vehicles are assigned to routes. Vehicles are assigned to operational blocks, which means most vehicles will be used on multiple routes during a service day. Blocks that serve at least one minority route were designated as a minority block. Minority blocks were assigned vehicles built in 2021 on average, with a typical length of 40 ft. and a seating capacity of 37 seats. Non-minority blocks were assigned vehicles built in 2017 on average, with a typical length of 35 ft. and a seating capacity of 35 seats (Table 27).

Table 27 – Vehicle Assignment by Route

October 2024				
Block	Most Frequent Assignment (Bus#)	Year	Length	Seating
1-1	5372	2023	40 ft	37
1-2	5327	2018	35 ft	30
1-3	5371	2023	40 ft	37
1-4	5375	2023	35 ft	33
1-5	5366	2023	40 ft	37
1-6	5374	2023	40 ft	37
1-7	5328	2018	35 ft	30
3-1	5323	2015	40 ft	37
3-2	5314	2014	40 ft	37
3-3	5311	2013	40 ft	37
3-4	5356	2022	40 ft	37
10-1	5337	2018	29 ft	23
123-1	5307	2013	40 ft	37
123-2	5326	2015	40 ft	37
123-3	5310	2013	40 ft	37
123-4	5309	2013	40 ft	37
123s1A	5328	2018	35 ft	30
123s1P	5333	2018	35 ft	30
170-1	5355	2022	40 ft	37
170-2	5357	2022	40 ft	37
170-3	5357	2022	40 ft	37
20-1	5001	2016	35 ft	30
225-1	5331	2018	35 ft	30
225-2	5376	2023	35 ft	33
225-3	5332	2018	35 ft	30
225-4	5361	2023	40 ft	37
225-5	5324	2015	40 ft	37
225-6	5373	2023	40 ft	37
25-1	5345	2018	35 ft	30
25-2	5377	2023	35 ft	33
26-1	5367	2023	40 ft	37
26-2	5343	2018	35 ft	30
268-1	5361	2023	40 ft	37
268-2	5324	2015	40 ft	37
268-3	5373	2023	40 ft	37
26s1A	5321	2015	40 ft	37
26s1P	5321	2015	40 ft	37

26s2A	5316	2014	40 ft	37
26s2P	5316	2014	40 ft	37
40-1	5365	2023	40 ft	37
40-2	5335	2018	35 ft	30
41-1	5359	2022	40 ft	37
42-1	5362	2023	40 ft	37
42-2	5306	2013	40 ft	37
42-3	5370	2023	40 ft	37
47-1	5378	2023	35 ft	33
47-2	5329	2018	35 ft	30
47-3	5379	2023	35 ft	33
47-4	5358	2022	40 ft	37
48-1	5312	2013	40 ft	37
48-2	5369	2023	40 ft	37
48-3	5358	2022	40 ft	37
50-1	5342	2018	29 ft	23
64-1	5364	2023	40 ft	37
64-2	5353	2022	40 ft	37
64-3	5360	2022	40 ft	37
64-4	5352	2022	40 ft	37
65-1	5363	2023	40 ft	37
65-2	5368	2023	40 ft	37

\*Minority  
Route

Table 28 – Vehicle Assignments by Minority & Non-minority Blocks

Route	Direction	AM Peak	Midday	PM Peak	Late
Metro Route 1	E	0.10	0.21	0.28	0.24
	W	0.11	0.21	0.24	0.20
Metro Route 3	N	0.16	0.17	0.27	0.20
	S	0.09	0.22	0.35	0.24
Route 10	E	0.08	0.12	0.10	0.03
	W	0.09	0.08	0.07	0.04
Route 20	E	0.22	0.17	0.15	0.15
	W	0.08	0.13	0.28	0.17
Route 25	CW	0.09	0.14	0.20	0.19
Route 26	N	0.11	0.14	0.19	0.16
	S	0.08	0.12	0.27	0.15
Route 40	E	0.09	0.16	0.29	0.19
	W	0.12	0.22	0.28	0.18

Route 41	CCW	0.09	0.08	0.20	0.10
	CW	0.04	0.09	0.18	0.08
Route 42	E	0.09	0.12	0.20	0.19
	W	0.11	0.18	0.21	0.17
Route 47	E	0.08	0.20	0.28	0.28
	W	0.09	0.19	0.28	0.16
Route 48	E	0.05	0.11	0.23	0.21
	W	0.07	0.14	0.26	0.18
Route 50	IB	0.07	0.15	0.15	0.12
	OB	0.04	0.13	0.14	0.10
Route 64	E	0.04	0.10	0.20	0.15
	W	0.18	0.09	0.12	0.10
Route 65	E	0.06	0.12	0.27	0.17
	W	0.18	0.10	0.23	0.14
Route 67	E	0.06	0.10	0.14	0.11
	W	0.06	0.11	0.19	0.11
Route 123	N	0.13	0.21	0.26	0.15
	S	0.14	0.19	0.27	0.13
Route 170	E	0.04	0.07	0.04	0.01
	W	0.03	0.05	0.06	0.03
Route 225	E	0.16	0.22	0.28	0.24
	W	0.10	0.19	0.23	0.22
Route 268	E	0.10	0.25	0.35	0.14
	W	0.19	0.22	0.25	0.33
					*Minority Route

### 3.2 2022-2024 EQUITY ANALYSIS REVIEW

#### Service & Fare Changes

BFT defines a major service change as one that "impacts at least 20% of a route's daily service hours or geographic coverage." Every three years, BFT prepares and submits equity analyses from the prior service monitoring period to the FTA as part of its Title VI Program documents. Upon review, BFT implemented major service changes in 2022 and 2024, with no fare changes since 2022.

BFT conducts a Title VI analysis for both fare and major service changes in accordance with FTA guidance. Moving forward, BFT will continue to assess service in alignment with Title VI.

#### FARE CHANGES IMPLEMENTED (2023-2025)

BFT has not made any fare policy changes since the 2022 Title VI update. Since summer 2022, BFT has implemented a fare-free program for children 18 and under, veterans, and seniors 65 and over. BFT went through a fare study that resulted in the approval of a new fare structure. A Title VI Fare Equity Analysis

was conducted, but ultimately implementation of said fare structure was delayed due to funding uncertainties at the state level. BFT will reevaluate its fare structure and look to implement a new structure in late 2025 or 2026, if approved by BFT’s Board of Directors.

### 3.3 MAJOR SERVICE CHANGES IMPLEMENTED (2022-2024)

In 2022, The service equity analysis of the proposed changes—Route 64 extension, Route 66 elimination, and Route 67 frequency increase and extension—found no disparate impact or disproportionate burden on minority or low-income populations. Instead, the 2022 Annual Service Plan changes resulted in a net gain in service for these groups.

Residents in non-minority areas along W Sylvester St, W Court St, and the south end of Rd 84—where Route 66 did not overlap with Routes 67 or 268—lost direct fixed-route service. In total, 32 low-ridership bus stops were removed, with most averaging fewer than one boarding per day. This change reflected Route 66’s low productivity and allowed BFT to reallocate resources to Route 67, resulting in greater benefits for Title VI communities.

To mitigate potential disruptions, BFT implemented several measures: continued service on Route 268 through the most productive segments of former Route 66, extended Route 67 to cover stops near Rd 100 and Chapel Hill Blvd, expanded the CONNECT on-demand rideshare service in West Pasco, reduced CONNECT fares to match fixed-route pricing, and provided additional buses during peak times along Route 268 when needed. These efforts helped ensure that the service changes did not result in inequities for minority or low-income populations.

The 2023 service changes did not meet the threshold outlined in BFT’s major service change policy and therefore did not require a service equity analysis. The service equity analysis for 2024 updates concluded that the implemented changes did not result in a disparate impact. Although there was potential for a disproportionate burden due to changes on Route 25, the discontinued stops had low ridership. Overall, the changes led to a net gain in service for low-income and minority populations.

As part of the implementation process, BFT conducted a route-by-route Title VI service equity analysis to assess the potential impact of the planned fixed-route service changes on low-income and minority populations (see Table 29).

*Table 29 –2022-2024 Major Service Change Overview*

Route	Major Service Change		Year	Notes
	Route Alignment	Revenue Hours		
Route 66	X	-	2022	Route eliminated
Route 64	X	+	2022	Route realigned and extended
Route 67	X	+	2022	Route extended to cover small portion of Route 66
Metro 1		-	2023	Reduced evening frequency, realignment at CCB/Quinault, and stop consolidation
Metro 3		-	2023	Reduced evening frequency and stop consolidation



Route 40		+	2023	Service added on Sunday
Route 42		-	2023	Service removed on Sunday
Route 47		+	2023	Frequency increased on Sunday
Route 48		+	2023	Frequency increased on Saturday
Route 268		+	2023	Service added on Saturday
Route 10/50/110	X	=	2024	Route 110 split into Route 10 and 50. Service eliminated in Hills West area. Frequency increased in area now covered by Route 50.
Route 25	X	=	2024	Service removed from Cottonwood St area
Route 123	X	+	2024	Route realigned to service Queensgate Transit Center. Small increase in revenue hours.
Route 170	X	+	2024	Route realigned and increased peak hour frequency

## CONCLUSION

An analysis of BFT services indicates that there is no significant disparate impact or disproportionate burden in the distribution of service or amenities within the PTBA. Furthermore, recent service changes have led to improvements in service to minority and low-income areas. BFT will continue to prioritize the needs of these communities in future service planning

# APPENDIX B

## BEN FRANKLIN TRANSIT RESOLUTION 15-2013

### **RESOLUTION Establishing a Title VI policy to be used for service changes and all fare increases**

**WHEREAS,** Ben Franklin Transit remains current on public policies in keeping with federal guidelines and;

**WHEREAS,** Title VI requirements from FTA call for a Title VI policy for guiding all fare and significant service changes and;

**WHEREAS,** Ben Franklin Transit as reviewed past service changes and fare increases, and

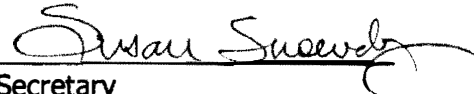
**WHEREAS,** THE PLANNING/MARKETING COMMITTEE OF THE BOARD has reviewed the proposed attached Schedule (A) – Title VI Policy Regarding Service Changes and Fare Increases. Public hearings were held on March 11, 2013 and comments were taken for over 30 days.

### **NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF DIRECTORS OF BEN FRANKLIN TRANSIT THAT:**

1. A Policy Statement for Policy Regarding Title VI Service Changes and Fare Increase (which is attached to this Resolution as "Schedule A" and incorporated herein by reference) is hereby adopted by Ben Franklin Transit as an official policy.

ADOPTED AT A REGULAR BEN FRANKLIN TRANSIT BOARD OF DIRECTORS meeting held Thursday, March 14, 2013, 1000 Columbia Park Trail, Richland, Washington.

ATTEST:

  
Secretary  
APPROVED AS TO FORM BY:

  
Matt Watkins, Chairman

  
Patrick T. Roach, Legal Counsel

# **Ben Franklin Transit Policy 1-2013**

## **Schedule "A"**

### ***Title VI policy regarding: Major Service Changes, Fare Changes and possible Discriminatory or Disproportionate Impacts***

The requirement for this policy comes from Federal Transit Administration (FTA) Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" which became effective October 1, 2012. The Circular requires any FTA recipient that operates 50 or more fixed route vehicles in peak service and serving a population of 200,000 or greater to evaluate any fare change and any major service change at the planning and programming stages to determine whether those changes have a discriminatory impact and or Disproportionate Impact. BFT has more than 50 vehicles in fixed service and we are serving an area that exceeds 200,000 in population. Therefore the following policy will be followed:

A major service change is defined as any change in service that would add or eliminate more than twenty percent of the revenue miles or twenty percent of the revenue hours. All major service changes will be subject to an equity analysis which includes an analysis of adverse effects. An adverse effect is defined as a geographical or time-based reduction in service which includes but is not limited to: span of service changes, frequency changes, service segment elimination, re-routing, or service elimination.

#### **Ben Franklin Transit Disproportionate Burden Policy**

The purpose of this policy is to establish a threshold which identifies when the adverse effects of a major service change or any fare change are borne disproportionately by low-income, any nationality or ethnic populations.

A disproportionate burden occurs when any low-income, particular nationality or ethnic population would be adversely affected by a fare or service change and this group represents five percent more than the average population of Ben Franklin Transit's service area.

Disproportionate burden on services with either span of service changes and/or frequency changes will be determined by analyzing all services with such changes together.

Disproportionate burden on services with segment elimination, re-routing, or service elimination will be determined on a route by route basis.

#### **Ben Franklin Transit Disparate Impact Policy**

The purpose of this policy is to establish a threshold which identifies when adverse effects of a major service change or any fare change are borne disproportionately by minority populations.

A disparate impact occurs when the minority population adversely affected by a fare or service change is ten percent more than the average minority population of Ben Franklin Transit's service area.

Disparate impacts on services with either span of service changes and/or frequency changes will be determined by analyzing all services with such changes together. Disparate impacts on services with segment elimination, rerouting, or service elimination will be determined on a route by route and/or service by service basis.

If Ben Franklin Transit finds a potential disparate impact or disproportionate burden, the agency will take steps to avoid, minimize or mitigate impacts then reanalyze the modified service plan to determine whether the impacts were removed. If Ben Franklin Transit chooses not to alter the proposed changes, the agency may implement the service or fare change if there is substantial legitimate justification for the change AND the agency can show that there are no alternatives that would have less of an impact on the minority population and would still accomplish the agency's legitimate program goals.

**Policy 1-2013 adopted by Resolution 15-2013 at the March 14, 2013 Board of Directors Meeting.**

# APPENDIX C

## BEN FRANKLIN TRANSIT RESOLUTION 26/2014

**RESOLUTION: TO ESTABLISH AN UPDATED PUBLIC INVOLVEMENT PROCESS, ESTABLISH A COMMENT AND COMPLAINT PROCESS AND RESCIND RESOLUTIONS 64-2013, 2-2013, 15-2013.**

**WHEREAS,** Ben Franklin Transit remains current on public policies in keeping with federal guidelines and;

**WHEREAS,** Ben Franklin Transit has reviewed prior procedures and has determined the need to update a policy regarding public involvement, comment and complaints

**WHEREAS,** THE PLANNING/MARKETING COMMITTEE OF THE BOARD has reviewed the attached Schedule (A) – Policy "Public Involvement, Comments and Complaints." Public hearings were held on 4/8/14 and comments were taken for over 30 days.

**NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF DIRECTORS OF BEN FRANKLIN TRANSIT THAT:**

1. A Policy Statement for Policy Regarding Public Involvement, Comments and Complaints (which is attached to this Resolution as "Schedule A" and incorporated herein by reference) is hereby adopted by Ben Franklin Transit as an official policy.

ADOPTED AT A REGULAR BEN FRANKLIN TRANSIT BOARD OF DIRECTORS meeting held Thursday, March 13, 2013, 1000 Columbia Park Trail, Richland, Washington.

ATTEST:

  
Secretary

  
Matthew Watkins, Chairman Board of Directors

APPROVED AS TO FORM BY:

  
Patrick T. Roach, Legal Counsel



Date: April 28, 2014

To: Edwin Frost, Interim General Manager  
From: Kathy McMullen, Manager Service Development

Subject: Public Involvement Process, Customer Comments and Complaints

### **Background**

BFT's Title VI responsibilities have increased with our area's increased population. In keeping with this effort staff has developed a policy to define public involvement processes, comments and complaints. After review by the Federal Transit Administration and further development of MAP 21 there have been revisions to this document. For clarification three previous resolutions have combined into one set of processes and definitions.

### **Analysis**

The attached policy includes the requirements in current federal guidelines for compliance with Title VI regulations. The policies are proposed to be taken out for public comments with the terms and changes outlined. The major changes summarized are:

- A formal public involvement process will be conducted for all major service changes or fare changes. These are outlined in the Title VI plan listing percentages of minority populations being addressed.
- At the General Managers discretion other policies or procedures may be presented to the Board for possible public involvement processes.
- A full complaint Title VI process is presented including an extended initial complaint period of 180 days after knowledge of the event.
- Percentage change in Disproportionate Policy from 5% to 20% and Disparate Impact policy from 10% to 20%.
- Inclusion of Program of Projects in the public process possible, including needed Environment Justice Analysis.
- Finally a Title VI complaint process is outlined.

### **Staff Recommendation:**

The Planning Marketing Committee directed staff to take the attached documents out for public comment and hearing. This public process included a legal notice, notification on our webpage, a 30 day comment period, notification on all transit vehicles, BFT Administration building and Three Rivers Transit Center. Interim General Manager Ed Frost requested changes including: Requiring Display ads in newspapers for all major service and any fare changes. This will involve Spanish and English ads in all papers listed in the Title VI plan. Further he asked that we add Multimedia to the listing. These changes can be seen on page

3 under Procedures item 2. These changes are included in the attached "Public Involvement Process, Comments and Complaints".

No substantive comments had been received to date. The hearing was held on April 8th with no attendees. Mr. Frost's suggested changes were made after the hearing and regarded as minor so not requiring further hearings. At this time the staff recommends adoption of the attached resolution and approval of the Title VI Plan also attached will all changes in blue.

Forward as presented:

  
Edwin Frost, Interim General Manager