



BEN FRANKLIN TRANSIT

**TITLE VI
PROGRAM**

2022

**PROGRAMA DEL
TÍTULO VI**

Adopted by BFT's Board of Directors
7/14/2022

PREPARED BY:
Planning & Service
Development





Executive Staff

Interim General Manager
Administrative Services Director
Operations Director
Human Resources & Labor Relations Director
Planning & Service Development Director

Ed Frost
Jeff Lubeck
Ayodeji Arojo
Wendi Warner
Keith Hall

Ben Franklin Transit
1000 Columbia Park Trail
Richland WA, 99352
509.735.5100

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.
Si necesita información en otro idioma, comuníquese al 509.735.5100.

[El Programa del Título VI está disponible en español.]

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INTRODUCTION

Ben Franklin Transit (BFT) provides public transportation services across a 617 square mile Public Transit Benefit Area (PTBA) within Benton and Franklin counties, located in Washington State. The PTBA includes the municipalities of Kennewick, Pasco, Richland, West Richland, Benton City, Prosser, and pockets of unincorporated areas in Benton and Franklin County. BFT's operation is accounted for under a single enterprise fund, which uses the same accrual accounting method as a private enterprise. BFT has no subrecipients and does not pass FTA funds through to subrecipients.

The estimated population of BFT's PTBA is 276,784 as of 2021 (Washington State Office of Financial Management) while Benton and Franklin counties have a combined estimated population of 304,895 (2020 Census). BFT's PTBA and surrounding areas consist of a diverse population of which 41.8% identify as a minority and 14.3% of the population are considered low-income. To ensure that these populations have equitable access to transit services, BFT has prepared this Title VI Program and accompanying documents pursuant to the 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 (FTA) Circular 4702.1B, "Title VI Program Guidelines for Federal Transit Administration Recipients," effective October 1, 2012.

BFT's Title VI Program documents the fulfillment of the general and transit provider requirements outlined in FTA Circular 4702.1B and reaffirms the agency's commitment to ensuring that no person is denied access to its transit services based on race, color, or national origin.

Figure 1 – General Requirements and Transit Provider Requirements

| General Requirements | Transit Provider Requirements |
|--|---|
| <ul style="list-style-type: none">• Provide Title VI Assurance• Prepare and Submit Title VI Program• Notify Beneficiaries of Protection Under Title VI• Develop and Maintain Title VI Complaint Procedures & Complaint Form• Record and Report Transit-Related Title VI Investigation, Complaints, and Lawsuits• Promote Inclusive Public Participation• Provide Meaningful Access to LEP Persons• Report Minority Representation on Planning and Advisory Bodies• Provide Assistance to Subrecipients• Monitor Subrecipients• Determination of Site or Location of Facilities | <ul style="list-style-type: none">• Set System-Wide Service Standards and Policies<ul style="list-style-type: none">• Load Factor• Vehicle Headway• On-Time Performances• Equitable Distribution of Service, Vehicles & Amenities• Collect and Report Demographic Data• Race/Ethnicity<ul style="list-style-type: none">• Income• Limited English Proficiency• Monitor Transit Services & Report Results• Evaluate Major Service & All Fare Changes |

1. TITLE VI PROGRAM GENERAL REQUIREMENTS

All recipients of FTA funds are required to document their compliance with DOT's Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once 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 the Federal FTA Circular 4702.1B, the FTA requires all FTA recipients to:

- Provide Title VI assurance.
- Notify the public of their protections under Title VI.
- Develop and maintain a Title VI Complaint procedure.
- Record and report Title VI investigations, complaints, and lawsuits.
- Promote inclusive participation through an established public involvement process.
- Provide meaningful access to Limited English Proficiency (LEP) populations.
- Report minority representation on advisory board.
- Aid and monitor subrecipients for Title VI compliance.
- Determine if a new facility site location is selected in a non-discriminatory manner.

The purpose of this section is to demonstrate the means by which BFT fulfills these general requirements pursuant to FTA Circular 4702.1B.

Additionally, BFT operates its programs and services in compliance with Executive Order 12898, "Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations", Executive Order 13166, "Improving Access to Service for Persons with Limited English Proficiency" (LEP) and the Federal Transit Administration (FTA) financial assistance with guidance and instructions necessary to carry out U.S. Department of Transportation (DOT) Title VI regulations pursuant to both Executive Orders. Although low-income and LEP persons aren't specifically mentioned as a protected class under Title VI, BFT is committed to meeting Title VI requirements while concurrently adhering to Environmental Justice and LEP requirements. This commitment to marginalized communities is reflected in the agency's planning, public involvement, and decision-making process.

1.1 TITLE VI ASSURANCE

Section 601 of Title VI of the Civil Rights Act of 1964 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.

As a direct recipient of federal funds from the FTA, BFT is obligated to operate its programs and services without regard to race, color, and national origin in accordance with Title VI and other applicable laws. To demonstrate BFT's compliance with Title VI, a Title VI Program must be reviewed and updated on a triennial basis, as outlined in FTA Circular 4702.1B.

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

BFT operates its programs and services without regard to race, color, or national origin. To ensure the public is aware of BFT’s commitment that no person is denied access to its transit services on the basis of race, color, or national origin, BFT notifies the public of their Title VI protections using the following statement text:

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.

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.

Si necesita información en otro idioma, comuníquese al 509.735.5100.

This statement of non-discrimination is posted in both English and Spanish in the foyers of the Administration Building, Operations Building, and Customer Service Center. Efforts to heighten the visibility of BFT’s Title VI Notice to the Public will be taken. These efforts include assessing the feasibility of posting the statement at transit centers and other high-traffic areas where customers are likely to see it.

An abbreviated version of BFT’s Title VI Notice to the Public is included in schedule books, external planning documents, and other informational materials. The abbreviated version notifies the public of their Title VI protections using the following statement text:

BFT operates its programs without regard to race, color, or national origin. To receive additional information, please contact 509.735.5100.

BFT no discrimina por motivos de origen étnico, color ni procedencia. Para recibir información adicional comuníquese con nosotros al 509.735.5100.

In the event BFT distributes federal funds to another governmental entity or sub-recipient, BFT will include Title VI language in all written agreements and will monitor for compliance.

Organizational Responsibilities

BFT's General Manager is authorized to ensure compliance with the provisions of BFT's policy of nondiscrimination and the law. Grants, programs, activities compliance, and Title VI coordination will be performed under the authority of the General Manager.

1.3 COMMENT & COMPLAINT PROCEDURES

General Public Comment Procedures

The BFT Customer Comment Policy has been established to ensure that customers of all modes of the system including: bus, paratransit, vanpool, and contracted services have an easy and accessible way to provide feedback to the agency. BFT is open to hearing any customer feedback including complaints, comments, suggestions, or concerns.

BFT receives public comments in the following ways:

- **Postage-free Customer Comment Cards** Available on BFT and contractor vehicles and at Pass Outlets in Spanish and English.
- **U.S. Mail** 1000 Columbia Park Trail, Richland, WA 99352.
- **Telephone** Riders can contact the BFT Customer Service Department 509.735.5100 or use established public comment lines when available.
- **E-mail** Riders can contact BFT by e-mail at contact@bft.org.
- **Language Line** For riders who speak a language other than English, BFT will utilize the services of Language Line SolutionsSM to facilitate calls. BFT also utilizes bi-lingual staff to communicate with LEP customers.
- **In-person** Comment cards are available at the Three Rivers Customer Service Center (7109 W. Okanogan Place, Kennewick, WA 99336) or at the Administration Building (1000 Columbia Park Trail, Richland, WA 99352).
- **Website** Riders can offer feedback on the BFT website, www.bft.org by going to the "Contact Us" link. Google Translate is linked to our site and assists communication with LEP customers.

Feedback Review Process All feedback from customers is valued. Anyone who submits a comment, complaint, or service suggestion to BFT and requests a response will receive an initial response within 15 working days provided they give legible contact information.

Complaints are recorded and investigated by staff. Suggestions and improvements for the system are made to address complaints if possible. Appropriate actions are taken to address complaints regarding staff, equipment, or processes.

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

Reporting Staff will compile an annual summary of customer comments for the Board and employees for use in reviewing and evaluating service.

Tracking BFT maintains a tracking system for all feedback from customers.

Title VI Complaint Procedure

BFT is committed to ensuring that no person is excluded from participating or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in FTA Circular 4702.1.B. BFT is also committed to ensuring that no person is denied benefits of transit service based on age or economic status. To this end, BFT has a complaint process in place to track and address complaints and claims of discrimination on the basis of race, color, or national origin.

Filing a Title VI Complaint Persons may file a signed, written complaint no later than 180 days from the date of the alleged discrimination. They are advised that a 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
By Facsimile: 509.735.1800**

BFT encourages persons to submit complaints that allege discrimination in writing or electronically. All complaints must be signed by the complainant and submitted within 180 days of an action arising under Title VI. The Title VI Coordinator will arrange reasonable accommodation as needed.

Complaint Review Procedure All complaints alleging discrimination based on race, color, or national origin in a service or benefit provided by BFT will be directly addressed by BFT. BFT shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, BFT shall make every effort to address all complaints in an expeditious and thorough manner.

In instances where additional information is needed for the investigation of the complaint, BFT will appropriately contact the complainant in writing unless otherwise requested. Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

Once sufficient information for investigating the complaint is received by BFT, BFT will prepare a draft written response subject to review by the transit’s attorney. If appropriate, the BFT attorney may administratively close the complaint. In this case, BFT will notify the complainant of the action as soon as possible.

Notification of the outcome of a complaint BFT will send a final written response to the complainant and advise the complainant of his or her right to

- 1) Appeal within seven (7) calendar days of receipt of the final written decision from BFT, and/or
- 2) File a complaint externally with the DOT and/or the 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, 5th 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 are available upon request by complainants, and the form is included in **Appendix A**.

Protection from Retribution

Customers of BFT shall be able to submit complaints and feedback or participate in the public involvement process without fear of retribution from the agency. If a customer feels like they are being treated unfairly in response to the feedback that they provided, they should contact the BFT Office of the General Manager. BFT will appropriately discipline any employee or contractor that retaliates against a customer.

1.4 LIST OF TITLE VI INVESTIGATIONS, COMPLAINTS, & LAWSUITS

There are no active investigations, complaints, or lawsuits against BFT alleging discrimination with regards to fares, routing, scheduling, or quality of transportation service on the basis of race, color, or national origin since the submission of BFT’s last Title VI Program update in 2016.

1.5 PUBLIC INVOLVEMENT POLICY & PROCESSES

Policy Statement and Purpose

It is the policy of BFT to encourage comments and input, including complaints on the proposed Program of Projects (POP), service changes, fare changes, and various policies. Title VI requires setting thresholds for this public comment process. The Disproportionate Burden and or Discriminatory Impact Policies are included in this document as the state required public input and BFT’s intention to resolve any concern regarding service and fare changes in the system.

In addition, BFT encourages comments on policies that may impact its customers and frequently carries out surveys, public forums, and open houses in addition to this formal process. The Customer Comment Record documents concerns or comments received from the public.

Public Involvement Processes

Changes requiring a public process will include changes defined in the BFT Title VI policies. Additional policies may be taken through a Public Input Process at the discretion of the General Manager.

Public involvement will be undertaken for major service changes, disparate impact burdens, capital projects and fare changes.

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

- Any change in service on any individual route that would eliminate more than 20% of the route revenue hours. All major service changes will be subject to an equity analysis which includes an analysis of adverse effects.
- Any change where systemwide revenue hours allocated to minority areas falls below the share of the service area population residing in minority areas.

Disparate Impact is defined as any one of the following:

- A service change leading to an adverse effect is defined as a geographical or time-based reduction in service which includes but is not limited to the span of service changes, frequency changes, route segment elimination, re-routing, or route elimination.
- A service change that could lead to a disproportionate burden occurs when the low-income population adversely affected by a fare or service change is 20% more than the average low-income population of BFT's service area.
- A disparate impact occurs when 20% or more of a reduction in system revenue hours occurs within minority or low-income areas.
- Program of Projects (POP) as included in the Transit Development Plan (TDP), Transportation Improvement Program (TIP) as well as any Environmental Justice (EJ) Analysis.
- Fare changes.

Procedures In order to ensure the maximum opportunity for public input and involvement in the decision process regarding major service changes and fare increases, BFT adheres to the following procedures:

- Provide at least a 30-day advance notice of public hearings regarding major service changes or fare increases in Spanish and English.
- Customers, the public, and the community will be informed of the proposed change, comment process, and public hearings by way of any of the following: newspaper display ads, multimedia news releases, onboard fliers, postings at BFT offices, and the BFT website. All media are in both Spanish and English.

- Proposals for major service changes and fare increases will be submitted to the BFT Citizens Advisory Network (CAN) for discussion, review, and comment. The CAN is a group of citizens that includes representatives of the disabled, educational institutes, major employers, and LEP portions of our customer base.
- All input and comments including minutes of public hearings, recommendations of the CAN, and BFT staff recommendations shall be provided to the BFT Board of Directors before any decision regarding changes to any Program of Projects, major service, fare, and other policies. Interpreters are present at all public hearings to translate information and take comments.
- BFT is working to reinvent and reinvigorate CAN in 2022.

Information Dissemination

BFT has committed itself to making all staff associated with the organization aware of Title VI requirements and best practices. Also, BFT puts emphasis on making certain that vehicle operators are adequately trained in the components of Title VI and most importantly in dealing with LEP customers. Additionally, BFT’s Board of Directors is addressed frequently during the Title VI update process, receiving information from its Title VI officer about the Title VI requirements and BFT’s policy regarding compliance. These are a few of the ways BFT disseminates Title VI information to the public and through every level of the organization hierarchy, from operator to its Board of Directors.

1.6 LANGUAGE ASSISTANCE PLAN

The population of BFT’s PTBA is diverse and is comprised of a sizable number of individuals who have limited or no English proficiency. These individuals are referred to as Limited English Proficiency (LEP) persons. LEP persons are defined as those individuals for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. LEP persons includes those who reported to the U.S. Census that they speak English “less than very well”, “not well”, or “not at all”.

To analyze and address the needs of LEP populations, BFT has developed a Language Assistance Plan that outlines outreach strategies to ensure that LEP persons have meaningful access to its programs and services. These outreach strategies were developed by conducting a Four-Factor Analysis in accordance with Department of Transportation’s LEP guidance. BFT’s Language Assistance Plan and accompanying Four Factor Analysis is included in **Appendix B**. BFT is working on adopting a policy that would dictate how the Language Assistance Plan is updated and implemented. The plan will be overseen by the Marketing team who also oversees customer service. Marketing ensures that the agency effectively communicates to the public ensuring to be inclusive of 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 on a quarterly basis as needed. Please note due to the COVID-19 pandemic The Citizens Advisory Network has not met since Spring of 2020. BFT will restore the committee in 2022.

As of April 1, 2019, 3 of the 10 CAN members self-identify as being part of a minority population (Table 1). BFT actively recruits and continues to reach out to community groups to find additional diverse individuals to represent their organization or interest group on the CAN. CAN applications and information are available in both English and Spanish on BFT's website.

BFT's CAN members represent diverse organizational and interest groups. CAN member representation includes:

- Clean Air/Good Roads/Energy Advocate
- Chamber of Commerce and Economic Development
- Tri-Cities Hispanic Chamber of Commerce
- Children Development
- 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 | 10% (1) | 1.4% |
| American Indian & Alaska Native | 0% | 0.5% |
| Asian persons | 0% | 2.6% |
| Native Hawaiian & Other Pacific Islander | 0% | 0.2% |
| Other | 0% | 4.7 % |
| Persons of Hispanic or Latino Origin | 20% (2) | 33.2% |
| Caucasian/White (not Hispanic) | 70% (7) | 57.8% |
| Minority % | 30% (3) | 42.2% |

1.8 **SUBRECIPIENT MONITORING**

Currently, BFT has no subrecipients and does not pass FTA funds through to any subrecipients. If BFT begins to allocate funds to a subrecipient, steps will be taken to ensure that the subrecipient is operating its programs without regard to race, color, and national origin.

In accordance with 49 CFR 21.9(b), BFT will provide a subrecipient with:

1. Sample notices to the public informing beneficiaries of their rights under DOT's Title VI regulations, procedures on how to file a Title VI Complaint, and the recipient's Title VI Complaint Form.
2. Sample procedures for tracking and investigating Title VI Complaints filed with a subrecipient, and when the primary recipient expects the subrecipient to notify the primary recipient of complaints received by the subrecipient.
3. Demographic information on the race and English proficiency of residents served by the subrecipient. This information will assist the subrecipient in assessing the level and quality of service it provides to communities within its service area and in assessing the need for language assistance.
4. Any other recipient-generated or obtained data, such as: travel patterns, surveys, etc., that will assist subrecipients in complying with Title VI.

To ensure that subrecipients are complying with the DOT Title VI regulations, BFT will monitor their subrecipients for compliance with the regulations. If a subrecipient is not in compliance with Title VI requirements, then BFT is also not in compliance. In order that both BFT and the subrecipient are in compliance with Title VI requirements, the following procedures will be implemented:

1. Document its process for ensuring that all subrecipients are complying with the general reporting requirements of this circular, as well as other requirements that apply to the subrecipient based on the type of entity and the number of fixed route vehicles it operates in peak service if a transit provider.
2. Collect Title VI Programs from subrecipients and review programs for compliance.
3. At the request of FTA, in response to a complaint of discrimination, or as otherwise deemed necessary by BFT, BFT shall request that subrecipients who provide transportation services verify that their level and quality of service is provided on an equitable basis in accordance with FTA Circular 4702.1B Chap. III-11. Subrecipients that 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 consult with the FTA to ensure that the appropriate level of environmental analysis for proposed capital projects is consistent with the National Environmental Policy Act (NEPA) and Washington State Environmental Policy Act (SEPA). When a categorical exclusion, environmental assessment, or environmental impact statement must be prepared, BFT will ensure that Environmental Justice analyses are integrated, consistent with Section IV-8 of FTA Circular 4702.1B. Additionally, as projects are developed, an inclusive public outreach and involvement program will be implemented to ensure the public has early and continuous opportunities to be involved in the process.

As stated above, BFT's capital projects are ensured to be compliant with NEPA and SEPA requirements. 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.

List of Planned Projects

Projects from 2019 - 2025

- Queensgate Transit Center
- Downtown Pasco Transit Center
- West Pasco / Broadmoor Transit Center
- Operations Building Expansion
- Renovation - Maintenance Building
- Bus Stop Concrete Construction and Amenity Installation
- Bus Stop Signage Update

1.10 **BOARD APPROVAL OF TITLE VI PROGRAM**

(Appendix G)

2. TITLE VI PROGRAM TRANSIT PROVIDER REQUIREMENTS

To comply with Title VI of the Civil Rights Act of 1964, Title 49, Chapter 53, Section 5332 of the United States Code and the Federal FTA Circular 4702.1B, the FTA requires all transit providers to set system-wide service standards and policies regarding:

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

Furthermore, BFT has been designated as a transit provider that operates 50 or more fixed route vehicles in peak service and is in a UZA of 200,000 or more in population. This designation means that BFT has further requirements. These requirements stipulate that BFT does the following on a triennial basis:

- Collect and report demographic data of service.
- Monitor and report on all fixed route transit services in relation to service standards and policies.
- Evaluate major service changes and all fare changes.

This section will demonstrate the means by which BFT fulfills these requirements that are specific to transit providers pursuant to FTA Circular 4702.1B.

2.1 SERVICE STANDARDS

Overview

Service standards are used to guide how we implement our service planning decisions; including system structure, route alignments, stop locations, service span and frequency, and areas of the community served. The following section describes a series of system-wide service standards that fulfill the service standard requirements in Title VI. Title VI requires all fixed route transit providers to develop quantitative standards for all fixed route modes of operation for the indicators listed below. BFT only operates fixed route bus service therefore all service standards apply to this mode. The following objectives are utilized to meet service standards per Title VI Circular FTA C 4702.1B. These service standards were initially adopted by the Board of Directors in 1982 with revisions to the Title VI Program update in 2016 and 2019 (**Appendix F**).

Service Standard Objectives To ensure compliance with each mode and method, the following metrics are monitored:

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

Vehicle Load 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 (Table 2). A 1.25 indicates that all seats are taken and no more than 25% of riders are standing. If it is observed that a trip/route is consistently reaching or exceeding a 1.25 load factor steps will be taken to add frequency or overload service to minimize 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 has determined that there is no need to develop a vehicle load standard for its Demand Response services due to the fact that the majority of paratransit trips include single customer and average load is below two (2) customers on vehicles at a time.

Vehicle Headway Standard

BFT route headways are adjusted based on ridership demand and market potential, using load factors, productivity, and development growth to inform the planning process. Current vehicle headways range from 15 to 60 minutes, apart from Route 170, which runs every 120 minutes. In 2021, BFT implemented two high-frequency corridor routes (Routes 1 and 3) which operate on fixed 15-minute frequencies. These routes create 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 varies by mode. Fixed route operates between zero (0) and five (5) minutes before a fixed route bus is considered late. Demand Response operates between zero (0) and 15 minutes before a Demand Response paratransit vehicle is considered to be late.

Service Availability Standard

BFT distributes fixed route bus service based primarily on observed demand, population trends, and land use. In 2020, BFT implemented a new on-demand CONNECT service to expand transit service to areas where demand does not warrant scheduled fixed route service. Through CONNECT, BFT aims to ensure that all residents of the PTBA are able to access Fixed Route or On-Demand services. DAR paratransit service operates on an eligibility basis throughout the entire PTBA, at a regular rate when the origin and destination are within $\frac{3}{4}$ of a mile of the service boundary, and at a premium rate when the origin or destination is beyond $\frac{3}{4}$ of a mile from the service boundary.

2.2 SERVICE POLICIES

Overview

The following section describes a series of system-wide service policies that fulfill the requirements for Title VI. Title VI requires that all fixed route transit providers develop standards for all fixed route modes of operation. The following indicators listed below are what is required according to Title VI Circular FTA C 4702.1B:

Service Policies Objective The following service policy objectives are utilized to ensure compliance with each mode and method:

- Monitor distribution of Transit Amenities
- Monitor Vehicle Assignment

Transit Amenities Distribution

Distribution The investment and equitable distribution of transit amenities by BFT is predicated on several factors. The main factor taken into consideration is ridership demand, which is driven by existing and projected development in the communities BFT serves.

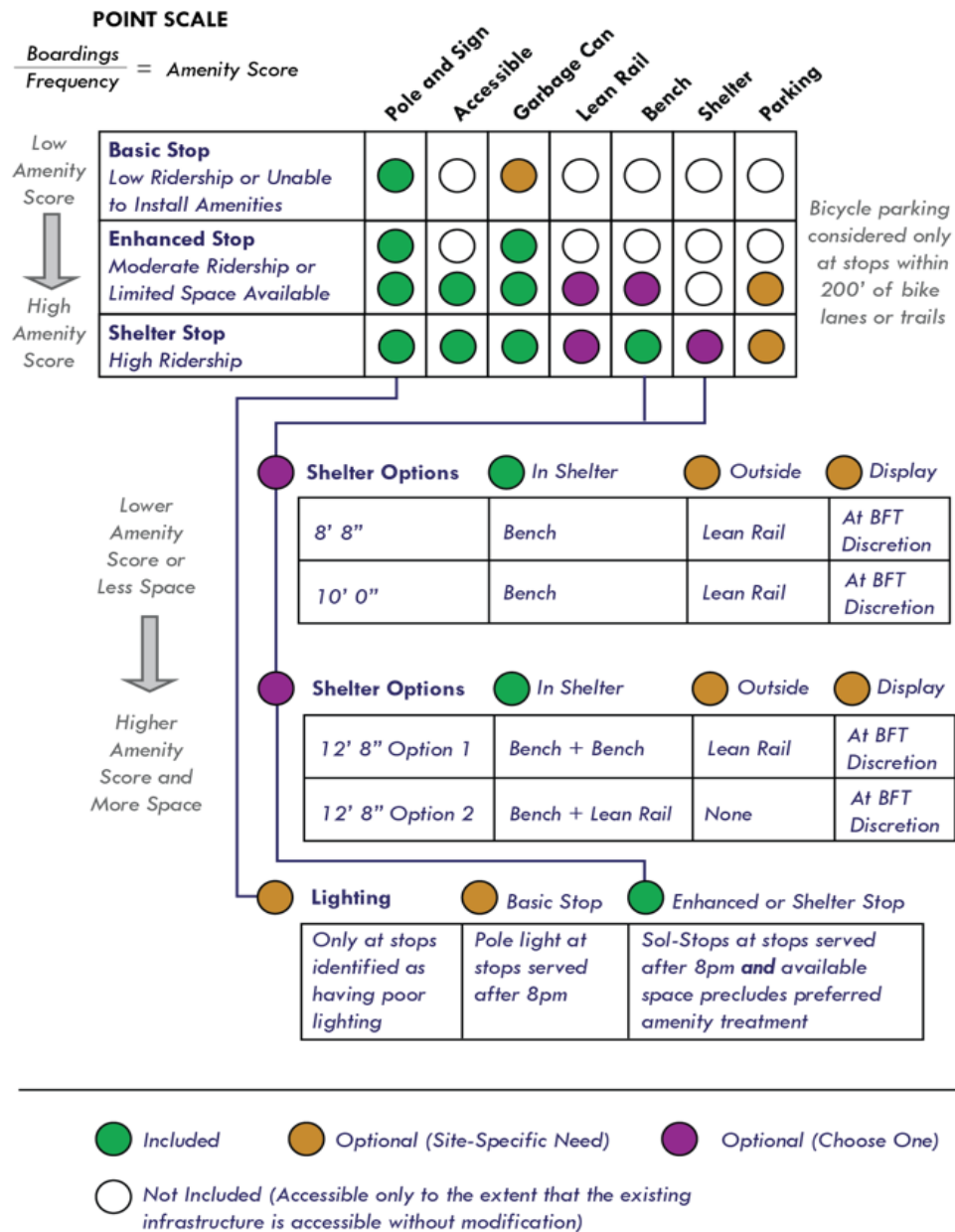
Amenity distribution was originally guided by productivity standards outlined in the *BFT Stop Guidelines and Amenities Policy*, adopted by the BFT Board of Directors in May 2018. BFT is currently working on updating those standards to reflect “lessons learned” from the implementation of the first round of improvements. This document will reflect updated standards. BFT uses a score based on ridership and frequency (Figure 2) to define what amenities go at a location as well as the projected development the

stop serves. The right-of-way (ROW) availability defines the priority readiness group the stop falls under, and the priority readiness group defines the type of timeline the stop is on for those improvements. Stops are assigned a label based on a score that is calculated by dividing the boardings by the route frequency, which stipulates the minimum recommended amenities to be provided at fixed route stops.

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.

Figure 2 – Amenity Selection



The average weekday boarding thresholds are based on best practices contained in TCRP Report 19 and then adapted and modified for BFT (Table 3). Other considerations for amenity placement include whether the stop is located on a Metro Route, and if the location had other constraints that would impede BFT’s ability to install suggested assigned amenities (e.g. ROW constraints, property owner disapproval, jurisdictional disapproval).

BFT’s service area contains a multitude of jurisdictions, including six (6) cities spread across two (2) counties. Each jurisdiction has differing procedures, development patterns, and standards. They also have different ways of handling ROW permitting, other permitting, and the process BFT must take to perform work within the ROW. Considering the lack of consistent development adjacent to BFT fixed routes, policies that dictate transit amenity distribution often cannot be applied uniformly across BFT’s service area. With that said, it is BFT’s obligation to ensure that there is an equitable distribution of transit amenities to the best of the agency’s ability.

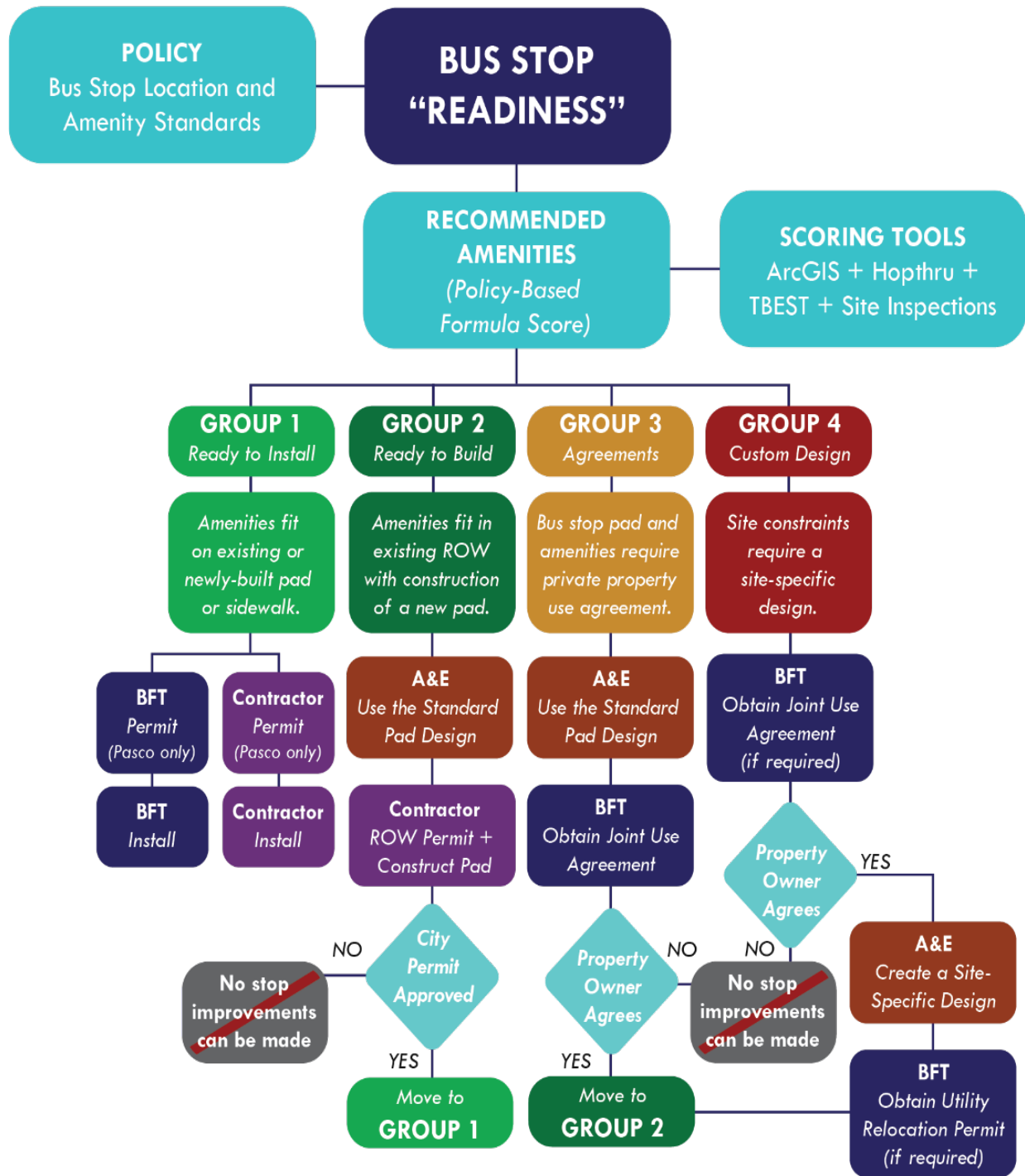
Table 3– Amenities Distribution by Stop (Average Weekday Boardings)

| 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**

After determining assigned amenities then reviewing the design needed for those amenities in the *BFT’s Bus Stop Design Standards*, the stops are placed into priority groups. The priority group readiness tells BFT how and when the stop is addressed and is ultimately determined by accessing the ROW at each location or proposed location through the corresponding county assessor’s website. Group 1 stops are ready for installation, Group 2 stops are ready to build (for both amenities and to make the stop ADA compliant), Group 3 stops are when a stop is outside the ROW and will need an agreement with the property owner to do work at the stop, and Group 4 stops are when the site needs a site-specific/custom design (e.g. retaining wall). As work on the stop is completed, it moves down through the groups (Figure 3).

Figure 3 – Bus Stop “Readiness” Groups



Transit Access

BFT fixed route service averages one stop every $\frac{1}{4}$ a mile on the majority of fixed routes and offers flag stops for customers as long as safety standards are met. Flag stops are locations where no physical pole exists but where riders can flag down a bus as it arrives. BFT is in the process of phasing out the use of flag stops by posting physical stops at these locations or removing the designation if the stop is in an illogical location and experiences little to no ridership. Furthermore, BFT works diligently to meet stop location demand as requested by the public. For service planning and evaluation purposes, BFT assumes that the distance customers will travel to access local urban fixed route service is $\frac{1}{2}$ a mile.

Vehicle Assignments

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 on a monthly basis assigning specific buses to specific operational 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.

2.3 DEMOGRAPHIC & SERVICE AREA PROFILE

Overview

Title 49 CFR 21.9(b) states that recipients “should have access to racial and ethnic data reflecting which minority groups are beneficiaries of programs receiving Federal financial assistance”. To ensure compliance with this regulation, BFT staff gather and analyze data on race, economic status, languages spoken by participants, beneficiaries, transit services, and programs. This analysis concluded that BFT’s PTBA and surrounding areas’ population is estimated to consist of 41.8% minority persons and 14.3% of the population as a household income at or below the federal poverty line. 12.3% of residents are considered to have limited English proficiency and are classified as LEP persons.

U.S Census data was used to create maps that depict the demographic profiles. The 2015-2020 American Community Survey 5-Year Estimates, 2014-2019 American Community Survey 5-Year Estimates, and 2020 Census Results were used during this process. A Geographic Information System (GIS) program, as well as a third-party mapping application known as Remix, was utilized to create geographic visual representations of the data (Table 4 - 5).

The following steps were taken to ensure this analysis was conducted pursuant to FTA Circular 4702.1B:

- Measure all census tracts for percentage of the minority population.
- Establish the minority percentages for the total service area and surrounding areas.
- Determine which census tracts have minority populations equal to or greater than the total minority percentage for the service areas.
- Establish the minority percentages for the total service area and within $\frac{1}{4}$ of a mile from a fixed route.

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

| Service Area Minority Average | Service Area Low-Income Average |
|-------------------------------|---------------------------------|
| 41.8% | 14.3% |

Source: U.S. Census Bureau, 2015-2020 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 | 81% | 26% | YES |
| 20 | 22% | 12% | |
| 25 | 26% | 15% | |
| 26 | 29% | 13% | |
| 40 | 55% | 31% | YES |
| 41 | 47% | 21% | YES |
| 42 | 53% | 27% | YES |
| 47 | 40% | 15% | |
| 48 | 45% | 16% | YES |
| 64 | 89% | 26% | YES |
| 65 | 92% | 22% | YES |
| 66 | 55% | 18% | YES |
| 67 | 63% | 14% | YES |
| 110 | 27% | 6% | |
| 123 | 30% | 10% | |
| 170 | 41% | 15% | |
| 225 | 54% | 11% | YES |
| 268 | 59% | 16% | YES |

Source: 2020 US Census Data

Race & Ethnicity

Race and ethnicity are analyzed by identifying minority populations that live within or in close proximity to BFT’s service area. Minority populations are classified as a readily identifiable group of minority persons who live in geographic proximity.

Minority populations include persons who identify as:

- **American Indian and Alaska Native:** A person having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- **Asian:** A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- **Black or African American:** A person having origins in any of the Black racial groups of Africa.
- **Hispanic or Latino:** A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- **Native Hawaiian or Other Pacific Islander:** A person to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- **Two or More Races/ Some Other Race:** Sixth category a person can identify if the above categories don't apply.

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

Upon further analysis, it has been concluded that 41.8% of BFT's PTBA population is considered to be part of a minority population (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 | 1.4% | 1.6% | 1.5% |
| American Indian & Alaska Native | 0.6% | 0.4% | 0.6% |
| Asian | 3.0% | 2.1% | 2.7% |
| Native Hawaiian & Other Pacific Islander | 0.1% | 0.1% | 0.1% |
| Persons reporting two or more races | 5.3% | 3.2% | 4.6% |
| Persons of Hispanic or Latino Origin | 22.5% | 52.6% | 32.6% |
| White persons not Hispanic | 67.1% | 40.0% | 57.9% |
| Minority Population | 32.9% | 60.0% | 41.8% |

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

Economic Status

Economic status is analyzed by identifying low-income populations that live within or in close proximity to BFT’s service area. Low-income person means a person whose median household income is at or below the U.S. Department of Health and Human Services poverty guidelines. Recipients are encouraged to use a locally developed threshold, such as the definition found in 49 U.S.C. 5302. For the purpose of this demographic analysis, low-income persons refer to an individual whose family income is at or below the poverty line. Low-income populations are classified as a readily identifiable group of minority persons who live in geographic proximity.

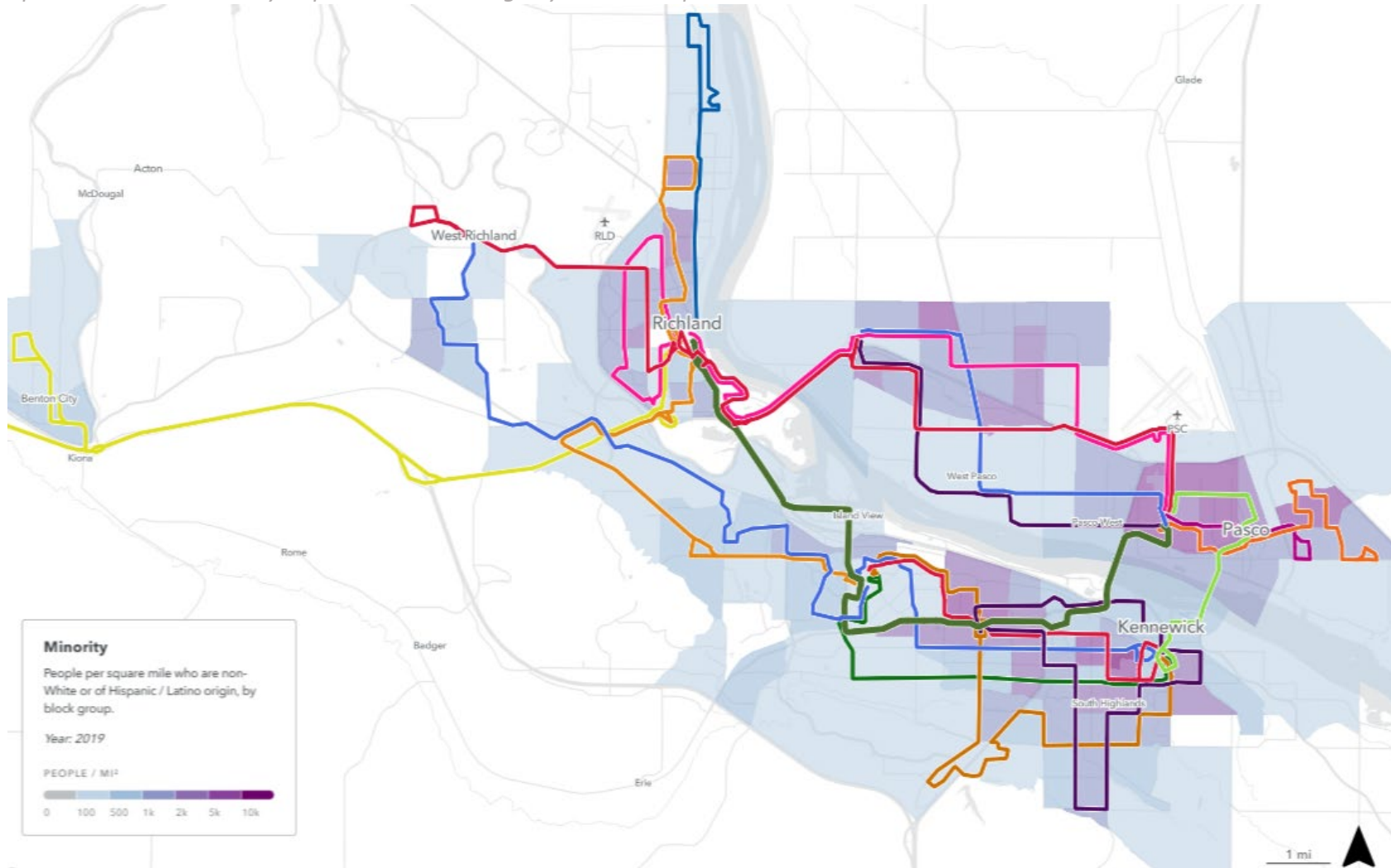
Although low-income populations are not a protected class under Title VI, they are protected under Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations”. BFT is committed to understanding the needs of low-income transit users so services can be adjusted and improved for these populations. 14.3% of BFT’s PTBA is considered to be at or below the federal poverty line (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 | 73,073 | 28,263 | 101,336 |
| Less than \$10,000 | 3.9% | 4.1% | 4.0% |
| \$10,000 to \$14,999 | 3.3% | 3.2% | 3.3% |
| \$15,000 to \$24,999 | 6.7% | 7.4% | 7.1% |
| Total Low-Income | 13.9% | 14.7 | 14.3% |
| \$25,000 to \$34,999 | 7.4% | 9.0% | 8.2% |
| \$35,000 to \$49,999 | 11.6% | 11.6% | 11.6% |
| \$50,000 to \$74,999 | 18.9% | 20.8% | 19.7% |
| \$75,000 to \$99,999 | 14.3% | 12.8% | 13.5% |
| \$100,000 to \$149,999 | 17.9% | 18.6% | 18.2% |
| \$150,000 to \$199,999 | 8.4% | 6.8% | 7.6% |
| \$200,000 or more | 7.6% | 5.7% | 6.6% |
| Median family income (dollars) | \$72,046 | \$66,984 | |
| Mean family income (dollars) | \$92,280 | \$84,906 | |

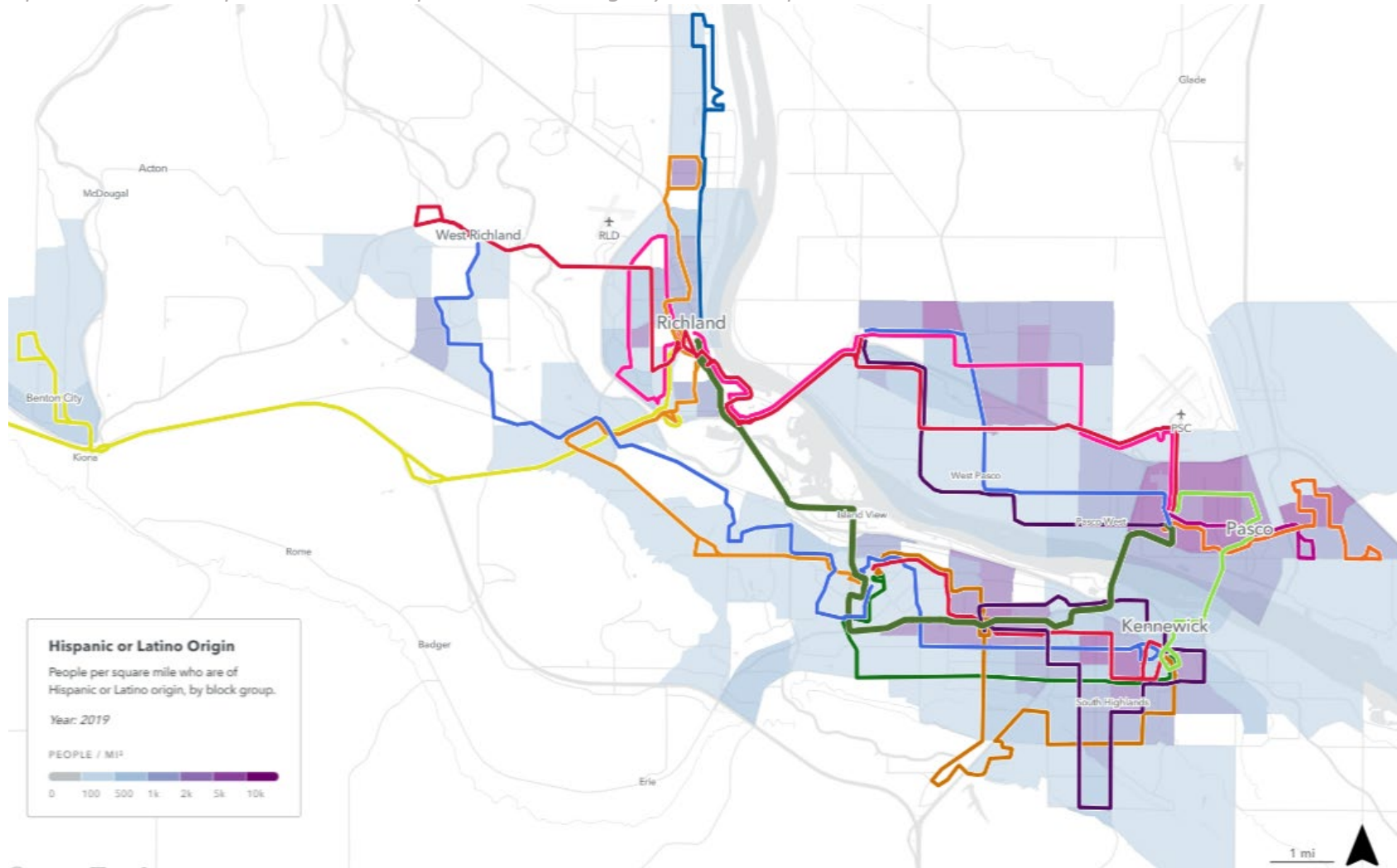
Source: U.S. Census Bureau, S1901 – Income in the Past 12 Months

Map 1 – BFT PTBA Minority Population Percentage by Block Group



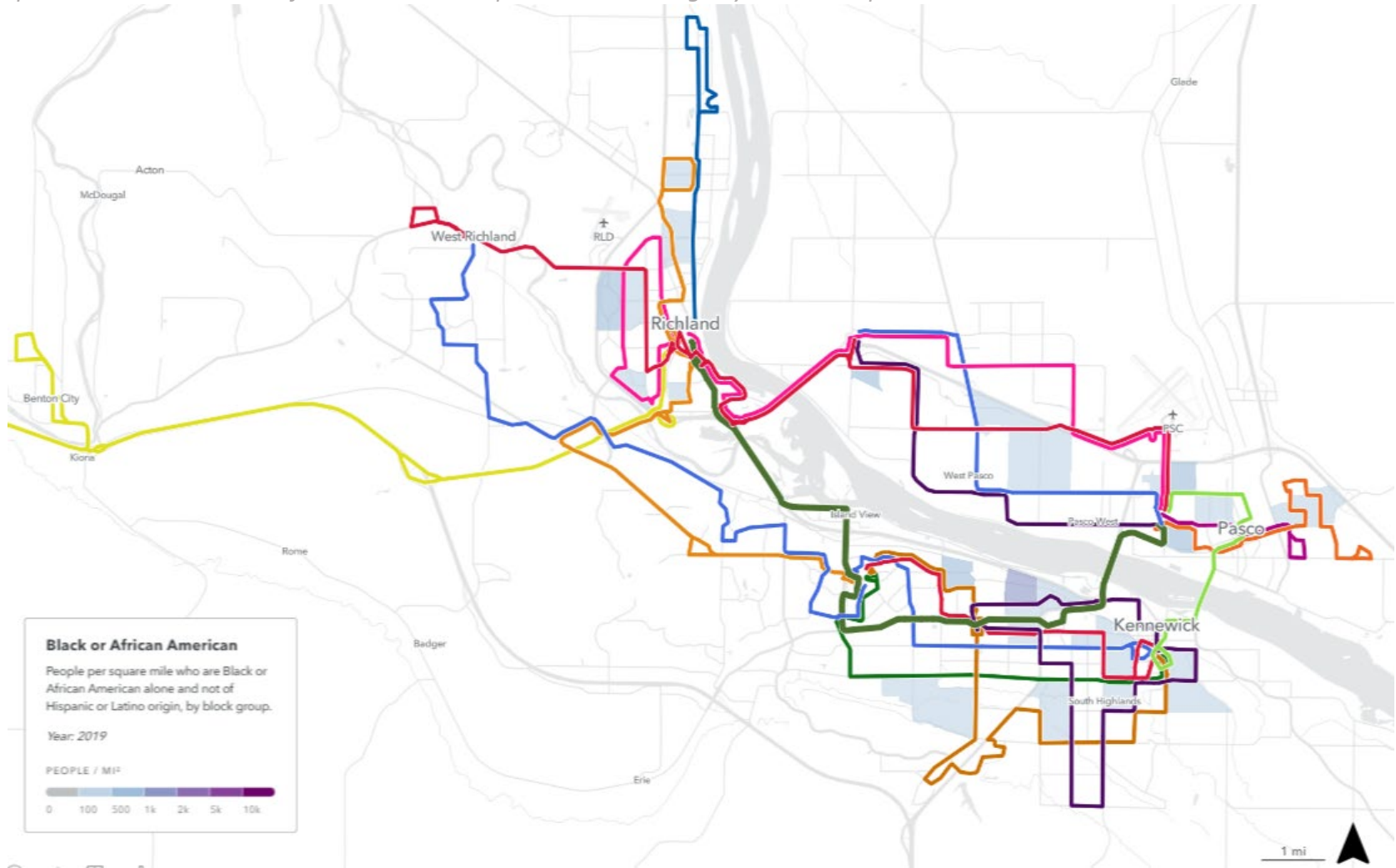
Source: U.S. Census Bureau, 2014-2019 American Community Survey 5-Year Estimates

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



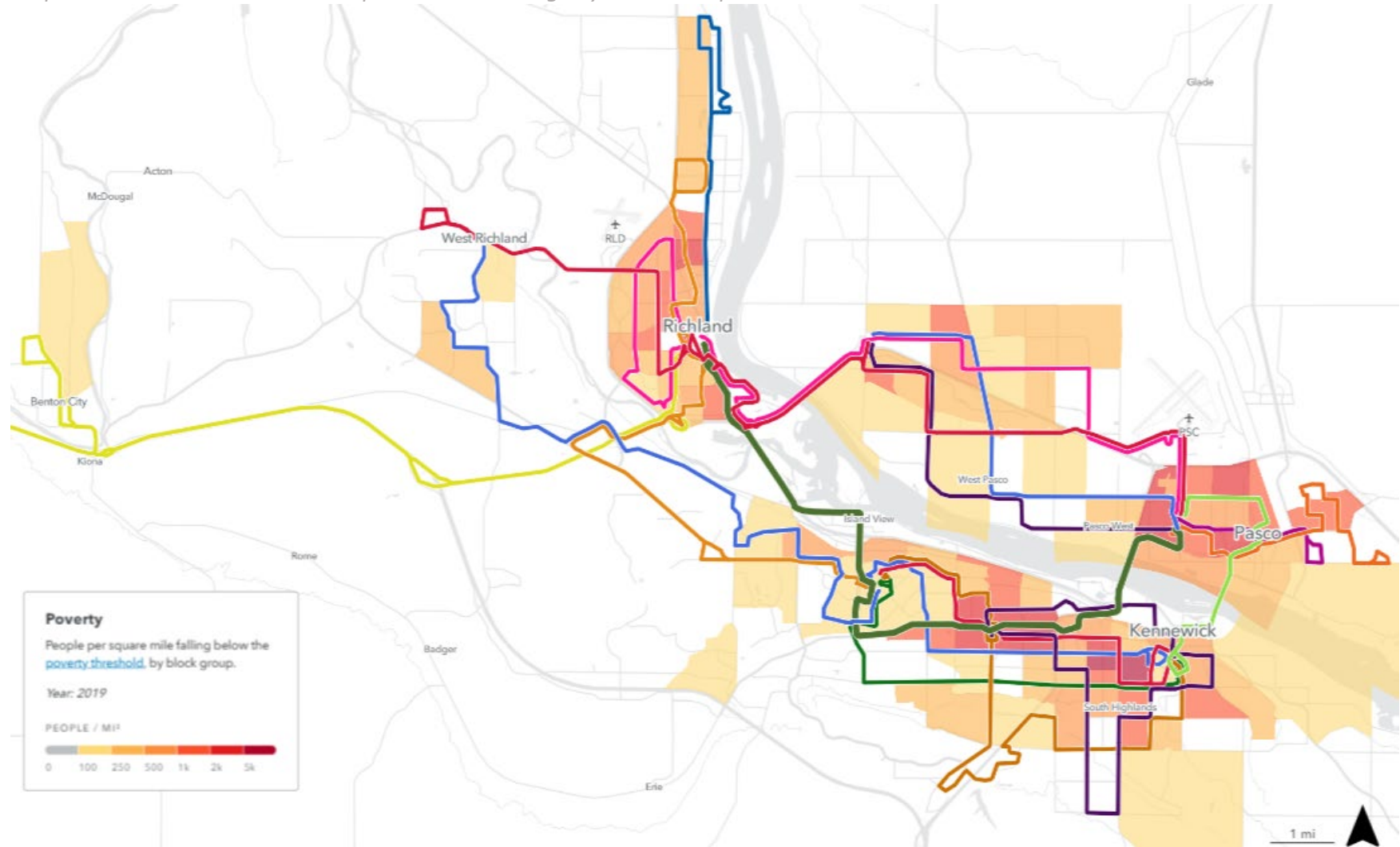
Source: U.S. Census Bureau, 2014-2019 American Community Survey 5-Year Estimates

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



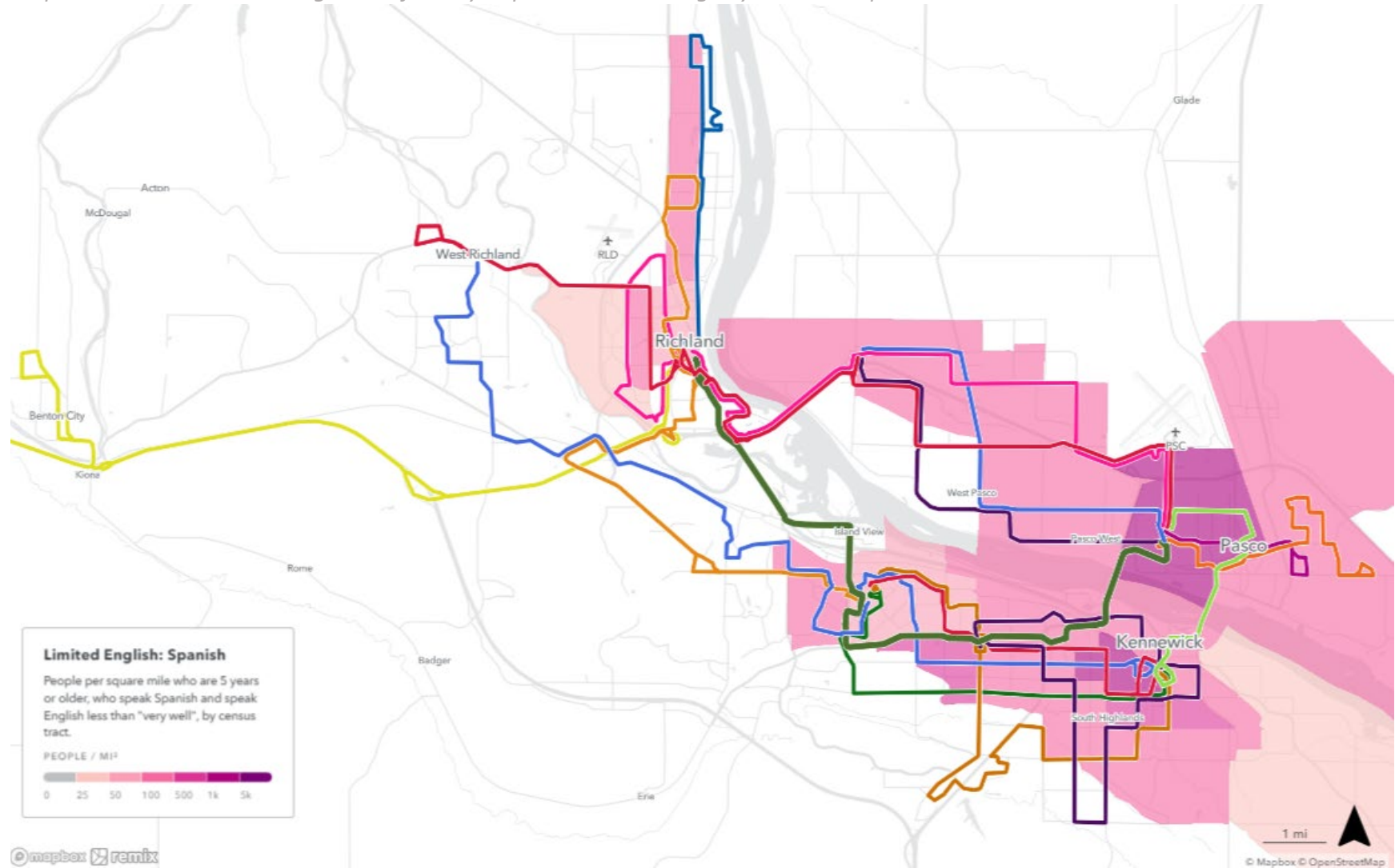
Source: U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates

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



Source: U.S. Census Bureau, 2014-2019 American Community Survey 5-Year Estimates

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



Source: U.S. Census Bureau, 2014-2019 American Community Survey 5-Year Estimates

Demographic Fare & Travel Pattern Breakdown

In April 2022 BFT conducted a comprehensive onboard survey with the intention of better understanding riders' demographic background, economic status, and general travel patterns. The survey was conducted over a two-week period from April 10th to April 23rd at transit centers, transfer points, and onboard fixed route buses. The survey was also made available throughout the entire month of April electronically via the BFT webpage and a scannable QR code that would direct riders to the survey on their smartphones.

Surveys were available in both English and Spanish to effectively survey LEP populations. Survey collection efforts began at 6:30 a.m. and depending on the day ended between 5 p.m. and 9 p.m. Over 1,900 surveys were collected throughout the survey period.

BFT's 2022 Onboard Survey concluded that on average 54% of BFT riders surveyed self-identified as a minority (Table 8). 44.1% of riders surveyed reported an annual income of less than \$15,000, indicating that a large portion of BFT riders are near or below the poverty line (Table 9).

Table 8 – 2022 Onboard Rider Survey Race/Ethnicity Results

| Race / Ethnicity | Rider Result % | General Population % |
|--|----------------|----------------------|
| African American / Black | 5.3% | 1.5% |
| American Indian & Alaska Native | 1.9% | 0.6% |
| Asian persons | 2.8% | 2.7% |
| Arab or Middle Eastern | 0.5% | |
| Native Hawaiian & Other Pacific Islander | 0.8% | 0.1% |
| Other | 2.9% | 4.6% |
| Persons of Hispanic or Latino Origin | 39.7% | 32.6% |
| Caucasian / White (not Hispanic) | 46.0% | 57.9% |
| Minority % | 54.0% | 41.8% |

Source: U.S. Census Bureau, 2020 US Census Data & BFT Onboard Rider Survey

Table 9 – 2022 Onboard Rider Survey Income Results

| Income | Rider Result % |
|----------------------|----------------|
| Under \$15,000 | 44.1% |
| \$15,000 - \$25,000 | 21.7% |
| \$26,000 - \$40,000 | 13.8% |
| \$41,000 - \$60,000 | 8.0% |
| \$61,000 - \$80,000 | 4.8% |
| \$81,000 - \$100,000 | 2.3% |
| \$100,000 and above | 5.2% |

Source: BFT Onboard Rider Survey

Fare Usage, Trip Purpose & Travel Patterns Minority and low-income riders reported using a pass 35% and 55% of the time, respectively (Figure 4). Minority and low-income riders reported using cash at a higher rate than minority or the total population. It was noted that low-income populations were the most likely to pay a reduced cash fare. Overall, cash was the most used method of fare payment for minority and low-income groups. Youth passes and Columbia Basin College passes were also used by a higher percentage of minority riders.

Figure 4 – Fare Payment Method by Ridership Group

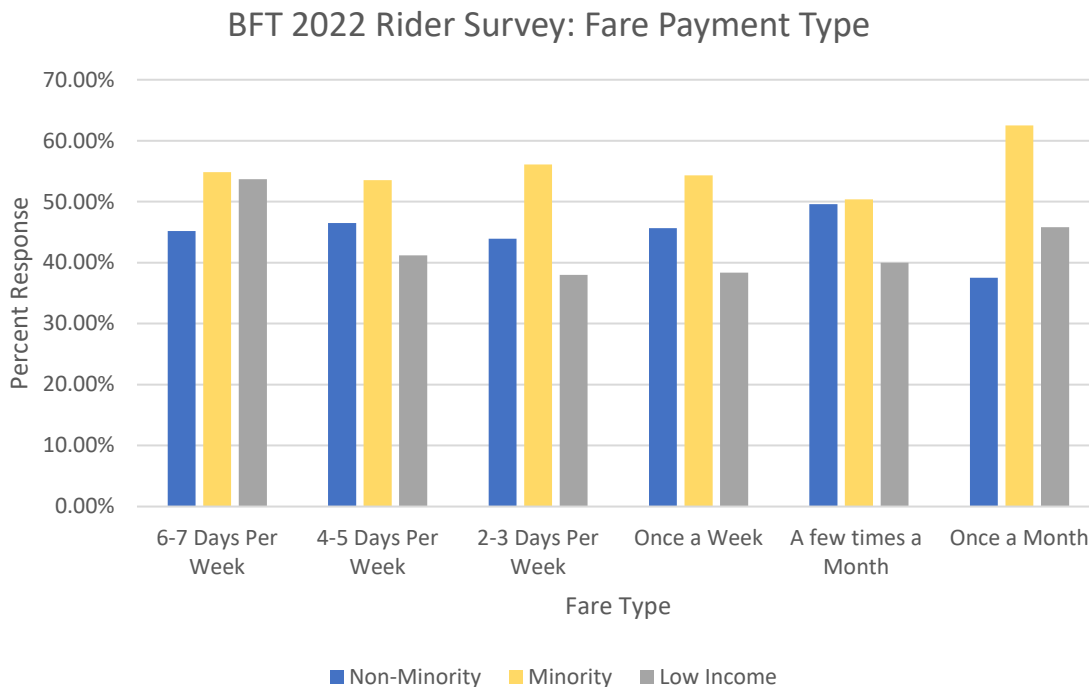


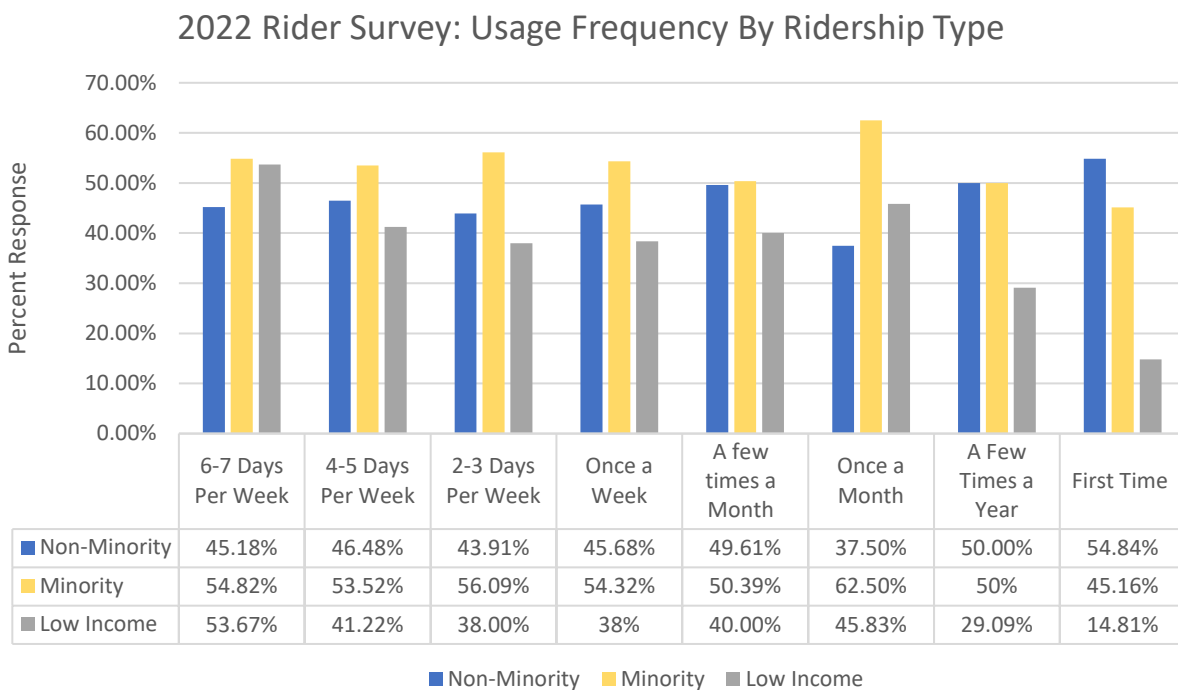
Table 10 – Fare Payment Type

| Payment Type | Non-minority | Minority | Low Income |
|-----------------------------|--------------|----------|------------|
| Paid Cash | 34.75% | 65.25% | 45.55% |
| Senior Pass | 58.91% | 41.09% | 32.38% |
| Youth Pass | 40.00% | 60.00% | 36.67% |
| Columbia Basin College Pass | 38.75% | 61.25% | 29.0% |
| Freedom Pass | 38.81% | 61.19% | 39.29% |
| Reduced Fare | 66.41% | 33.59% | 59.48% |

Source: 2022 BFT Rider Survey

35.6% of all riders surveyed reported that they use the bus six (6) or more times a week (Figure 5). Low-income populations are reported as most likely to ride the bus six (6) days a week). Minority and low-income riders were much more likely to be utilizing the bus daily when compared to the general population. Riders reported that 81.2% had transferred at least once to another BFT bus to reach their final destination. 70.4% of riders reported not having regular access to an automobile, 43.9% make less than \$15,000 a year, and 26.1% speak a second language other than English at home.

Figure 5 – Usage Frequency by Ridership Type



Source: 2022 BFT Rider Survey

2.4 TITLE VI MAJOR SERVICE & FARE CHANGE POLICIES

Overview

According to the stipulations outlined in FTA Circular 4702.1B §4, Chap.4-10, BFT will prepare a Title VI/ Environmental Justice equity analysis, where applicable, of all major service and fare changes using current FTA guidance. This documentation will be submitted to FTA as well as kept on file at BFT. The analysis will evaluate the proposed changes and their impacts on minority and low-income populations within the BFT service area, including discussion of outreach and public involvement strategies and activities used to involve and inform minority, low-income, and Limited English Proficiency populations throughout the decision-making process.

Service Change and Fare Change equity analysis will be conducted when said changes exceed the quantitative threshold outlined in *BFT's Major Service Change, Disproportionate Burden and Discriminatory Impact Policy*, which was adopted by the BFT Board of Directors via Resolution 15-2013 (**Appendix C**). Additional changes to the *Disproportionate Burden and Discriminatory Impact Policy* were made via the BFT Board of Directors' adoption of Resolution 26-2014 (**Appendix D**). BFT intends to update the Major Service Change Policy by way of Resolution XX-2022 when this program update is approved in July 2022.

Major Service Change, Disproportionate Burden & Discriminatory Impact Policies

The requirement for this policy comes from 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 serves a population of 200,000 or greater. The policy requires BFT 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. As of 2021, BFT operated 49 fixed route vehicles in annual maximum service in a service area that exceeds 200,000 in population

BFT Major Service Change Policy A major service change is defined as any change in service on any individual route that would eliminate more than 20% of the route revenue miles and/or twenty percent of the route revenue hours. Additionally, an equity analysis will occur when the systemwide revenue hours allocated to minority areas falls below the share of the service area average.

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 the span of service changes, frequency changes, route segment elimination, re-routing, or route elimination.

BFT Disproportionate Burden Policy The purpose of this policy is to establish a threshold that identifies when the adverse effects of a major service change or any fare change disproportionately affects low-income populations.

If the impact of a major service change proposal or any fare change proposal requires a low-income population to receive benefits 20% less or to bear adverse effects 20% more than those benefits or adverse effects received or borne by the non-minority population, that impact will be considered a disproportionate burden.

Disproportionate burden on routes with either span of service changes and/or frequency changes will be determined by analyzing all routes with such changes together. Disproportionate burden on routes with segment elimination, re-routing, or route elimination will be determined on a route-by-route basis.

BFT Disparate Impact Policy The purpose of this policy is to establish a threshold that identifies when adverse effects of a major service change or any fare change disproportionately affect members of a group identified by race, color, or national origin.

If the impact of a major service change proposal or any fare change proposal requires a minority population to receive benefits 20% less or to bear adverse effects 20% more than those benefits or adverse effects received or borne by the non-minority population, that impact will be considered a disparate impact.

If BFT finds a potential disparate impact or disproportionate burden, the agency will take steps to avoid, minimize or mitigate impacts, and then re-analyze the modified service plan to determine whether the impacts were removed. If BFT chooses not to alter the proposed changes, the agency may implement the service or fare change if there is a 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.

3. 2021-2022 SERVICE MONITORING REVIEW

Every three years BFT prepares a review of its compliance with Title VI requirements to apply and monitor system-wide service standards and policies to ensure equitable transit services are available to minority and low-income populations as outlined in FTA Circular 4702.1B. This section will detail the analysis of BFT's fixed route system and determine if the adopted system-wide service standards and policies have been fully adhered to and fulfilled.

To perform an insightful review of system-wide service standards and policies, BFT is required to select a sample of minority and non-minority routes that provide service to predominantly respective areas. This sample includes all routes within BFT's fixed route network apart from demonstration services and overload/tripper routes. Minority and non-minority routes were compared to ensure no disparity in application and adherence to BFT's adopted system-wide service standards and policies exist.

According to FTA, a minority transit route "has at least 1/3 of its total revenue mileage in a Census block or block group, or traffic analysis zone(s) with a percentage of the minority population that exceeds the percentage of minority population in the transit service area." BFT considers a minority route to be any route where the minority population percentage is within ¼ of a mile and exceeds the average minority population percentage in the overall service area. The majority of BFT routes (12 out of 19 routes) meet this definition of a minority route.

The following steps were taken to ensure service monitoring was conducted pursuant to FTA Circular 4702.1B:

- Identify and designate individual routes as minority or non-minority.
- Establish system-wide averages for service, vehicles, and amenity distribution.
- Inventory service and amenities by route (both minority and non-minority).
- Evaluate individual routes to assess any disproportionate impacts for any route for any category of evaluated criteria.
- Document any corrective action based upon 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 the period of October 1st through December 31st, 2021

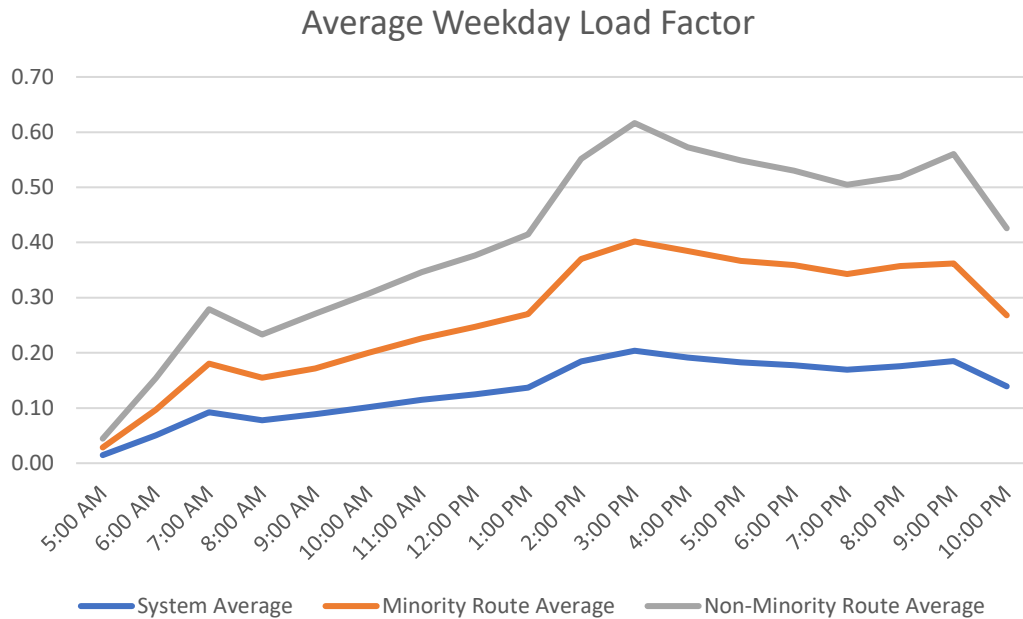
Vehicle Load

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/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 occurring during the period of October 1st through December 31st, 2022, concluded that no routes 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 0.20 and 0.21 respectively during this span (Figure 6) Saturday trips were observed to have a lower average load, with minority and non-minority routes experiencing an average PM peak load factor of 0.14 and 0.13 respectively (Table 13). 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.

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.

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



3.2 VEHICLE HEADWAY

Fixed Route Service Standard Statement

BFT route headways are adjusted based on ridership demand and market potential, using load factors, productivity, and development growth to inform the planning process. Current vehicle headways range from 15 to 60 minutes, apart from Route 170, which runs every 120 minutes. Portions of high-traffic commercial corridors such as Court St (Pasco) and Clearwater (Kennewick) experience all-day 15-minute frequency with BFT’s Metro Routes 1 and 3, which were implemented in June of 2021.

Analysis Vehicle headways by route determined that there is no apparent or intentional disparity between average headways for minority and non-minority routes. On weekdays minority and non-minority routes have an average headway of 35 and 47 minutes, respectively (Table 14). On Saturdays, minority and non-minority routes have an average headway of 35 and 49 minutes, respectively (Table 15). Minority service ends an average of 19 minutes later on weekdays. Schedules used to determine average headways are from October 2018.

Table 11 – Weekday Headway by Route

| Weekday By Route | | | | | | | |
|------------------|----------------|-----------------|----------------|-----------------|------|--------------|-------------------------|
| Route Number | Service Begins | AM Peak Headway | Midday Headway | PM Peak Headway | Late | Service Ends | Approx. Operating Hours |
| 1 | 6:00 AM | 15 | 15 | 15 | 15 | 10:00 PM | 16 |
| 3 | 6:00 AM | 15 | 15 | 15 | 15 | 10:00 PM | 16 |
| 20 | 6:15 AM | 30 | 30 | 30 | 30 | 10:00 PM | 15.75 |
| | | | | | | | |
| 25 | 5:45 AM | 30 | 30 | 30 | 30 | 8:00 PM | 14.3 |
| 26 | 6:00 AM | 30 | 30 | 30 | 30 | 9:30 PM | 15.5 |
| 40 | 6:15 AM | 30 | 30 | 30 | 30 | 8:00 PM | 13.8 |
| 41 | 6:00 AM | 60 | 60 | 60 | 60 | 8:00 PM | 14.0 |
| 42 | 6:00 AM | 30 | 30 | 30 | 30 | 9:30 PM | 15.5 |
| 47 | 6:00 AM | 30 | 30 | 30 | 30 | 9:30 PM | 15.5 |
| 48 | 6:00 AM | 30 | 30 | 30 | 30 | 9:30 PM | 15.5 |
| 64 | 6:00 AM | 30 | 30 | 30 | 30 | 8:00 PM | 14.0 |
| 65 | 6:00 AM | 30 | 30 | 30 | 30 | 9:30 PM | 15.5 |
| 66 | 6:30 AM | 60 | 60 | 60 | 60 | 9:30 PM | 15.0 |
| 67 | 6:00 AM | 60 | 60 | 60 | 60 | 10:00 PM | 14.0 |
| 110 | 5:45 AM | 60 | 60 | 60 | 60 | 7:30 PM | 14.3 |
| 123 | 6:00 AM | 30 | 30 | 30 | 30 | 10:00 PM | 16.0 |
| 170 | 5:30 AM | 120 | 120 | 120 | 120 | 8:30 PM | 15.0 |
| 225 | 6:00 AM | 30 | 30 | 30 | 30 | 10:00 PM | 16.0 |
| 268 | 5:45 AM | 30 | 30 | 30 | 30 | 8:00 PM | 14.3 |

*Minority

Table 12 – Average Vehicle Headway by Route

| | AM Peak Headway | Midday Headway | PM Peak Headway | Late | Service Ends | Approx. Operating Hours |
|-----------------------------|-----------------|----------------|-----------------|------|--------------|-------------------------|
| System Average | 44 | 44 | 44 | 44 | 9:06 PM | 15.1 |
| Minority Route Average | 35 | 35 | 35 | 35 | 9:16 PM | 15.0 |
| Non-minority Route Average* | 47 | 47 | 47 | 47 | 9:00 PM | 15.2 |

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

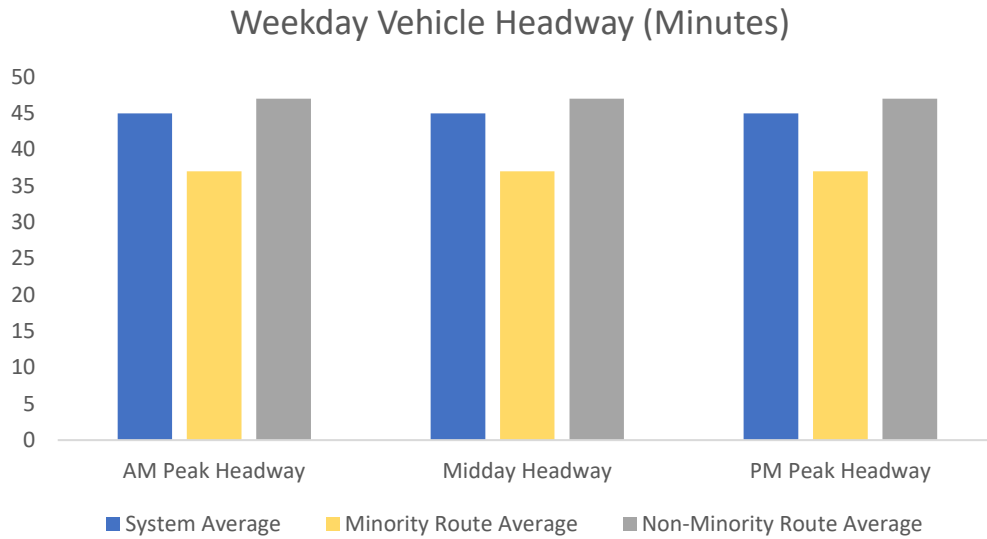


Table 13 – Saturday Vehicle Headway by route

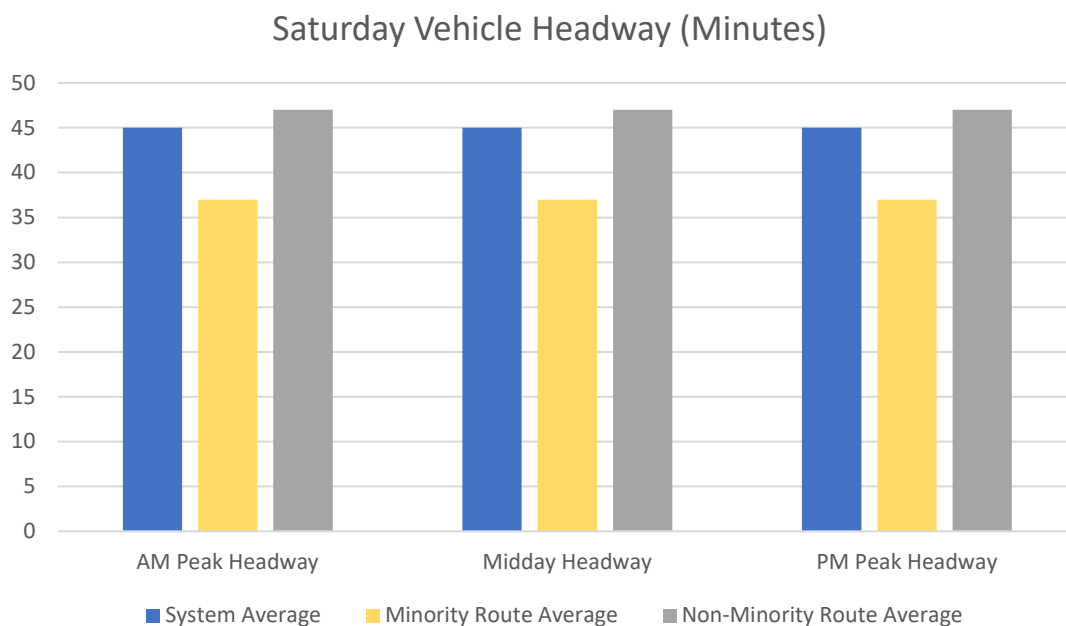
| Saturday By Route | | | | | | | |
|-------------------|----------------|-----------------|----------------|-----------------|------|--------------|-------------------------|
| Route Number | Service Begins | AM Peak Headway | Midday Headway | PM Peak Headway | Late | Service Ends | Approx. Operating Hours |
| 1 | 7:00 AM | 15 | 15 | 15 | 15 | 10:00 PM | 15 |
| 3 | 7:00 AM | 15 | 15 | 15 | 15 | 10:00 PM | 15 |
| 20 | 7:15 AM | 30 | 30 | 30 | 30 | 10:00 PM | 14.75 |
| 25 | 6:45 AM | 30 | 30 | 30 | 30 | 7:00 PM | 14.0 |
| 26 | 7:00 AM | 30 | 30 | 30 | 30 | 9:30 PM | 14.5 |
| 40 | 7:15 AM | 30 | 30 | 30 | 30 | 8:00 PM | 12.8 |
| 41 | 7:00 AM | 60 | 60 | 60 | 60 | 8:00 PM | 13.0 |
| 42 | 7:00 AM | 30 | 30 | 30 | 30 | 9:30 PM | 14.5 |
| 47 | 7:00 AM | 30 | 30 | 30 | 30 | 9:30 PM | 14.5 |
| 48 | 7:00 AM | 30 | 30 | 30 | 30 | 9:30 PM | 14.5 |
| 64 | 7:00 AM | 30 | 30 | 30 | 30 | 8:00 PM | 13.0 |
| 65 | 7:00 AM | 30 | 30 | 30 | 30 | 9:30 PM | 14.5 |
| 66 | 6:30 AM | 60 | 60 | 60 | 60 | 9:30 PM | 15.0 |
| 67 | 6:00 AM | 60 | 60 | 60 | 60 | 10:00 PM | 14.0 |
| 110 | 5:45 AM | 60 | 60 | 60 | 60 | 7:30 PM | 14.3 |
| 123 | 6:00 AM | 30 | 30 | 30 | 30 | 10:00 PM | 16.0 |
| 170 | 5:30 AM | 120 | 120 | 120 | 120 | 8:30 PM | 15.0 |
| 225 | 6:00 AM | 30 | 30 | 30 | 30 | 10:00 PM | 16.0 |
| 268 | 5:45 AM | 30 | 30 | 30 | 30 | 8:00 PM | 14.3 |

*Minority

Table 14 – Saturday Average Vehicle Headway

| Routes | AM Peak Headway | Midday Headway | PM Peak Headway | Late | Service Ends | Approx. Operating Hours |
|----------------------------|-----------------|----------------|-----------------|------|--------------|-------------------------|
| System Average | 45 | 45 | 45 | 47 | 9:03 PM | 14.4 |
| Minority Route Average | 37 | 37 | 37 | 47 | 9:03 PM | 14.2 |
| Non-minority Route Average | 47 | 47 | 47 | 50 | 9:04 PM | 14.6 |

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



On time Performance

Fixed Route Service Standard On time performance varies by mode. Currently, fixed route operates between zero (0) and five (5) minutes before a fixed route bus is considered late.

Analysis Fixed route on time performance data from February 1st to March 31st, 2022, concluded that 91.5% of all routes sampled departed from their scheduled timepoints on time, 3.8% departed early, and 4.7% departed late. Minority routes were on time 91.5% of the time with non-minority routes performing at a slightly lower on time rate of 89.2% (Table 15). Based on this information, it was concluded that no apparent or intentional disparity exists between minority and non-minority routes in terms of BFT’s on time performance standard.

Although overall minority routes performed better than non-minority routes, Routes 3, 65, and 268 (All minority routes) had on time performance rates lower than the average for minority routes. These routes along with Routes 20 (88.2%) and 26 (89.7%) have been identified as underperforming and will be analyzed further to determine how their On time route performance can be improved.

Figure 9 – On time Performance by Route

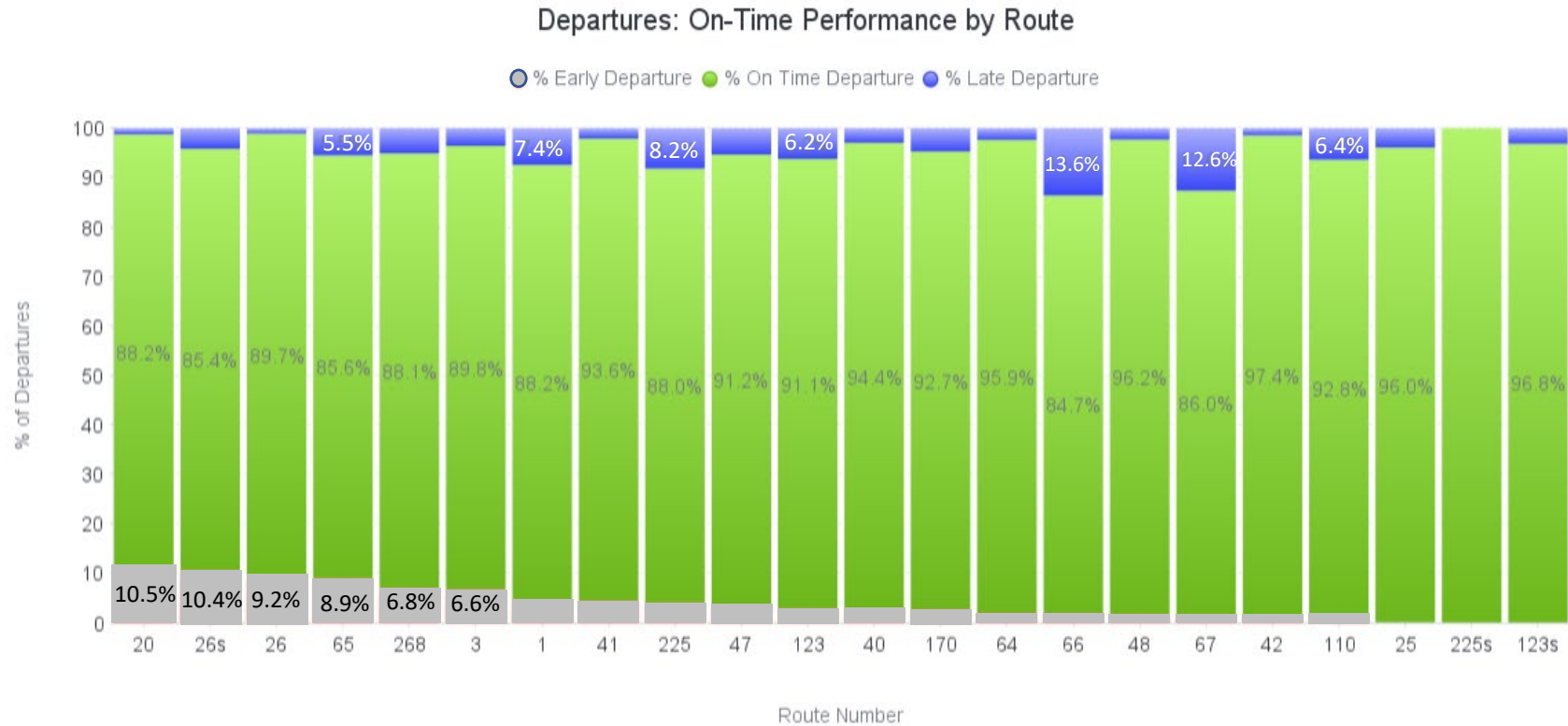


Table 15 – On time Performance by Minority & Non-minority Routes

| Routes | % On time | % Early | % Late |
|----------------------------|-----------|---------|--------|
| System Average | 91.5% | 3.8% | 4.7% |
| Minority Route Average | 91.9% | 4.1% | 4.0% |
| Non-minority Route Average | 89.2% | 4.4% | 6.4% |

Service Availability

Fixed Route Service Policy Statement BFT distributes transit service based on observed demand, population trends, and land use. BFT aims to ensure that all residents of the PTBA have access to transit services with either scheduled fixed-route service or CONNECT On-Demand service.

Table 16 – Population within ½ a Mile of Fixed Route Service

| Name | Total Population within 1/2 Mile of Transit 2022 | Total Population | Percent Total Population 2022 | % Total Population within 1/2 Mile of Transit 2018 | Minority Population within 1/2 miles of Transit 2022 | % Minority population within 1/2 miles of Transit 2022 |
|--------------------------------------|--|------------------|-------------------------------|--|--|--|
| Pop. within ½ Mile of Transit | 208,305 | 275,388 | 75.60% | 72% | 79,553 | 79% |

*Source: Washington State Office of Financial Management, SAEF

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 16). 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 located where existing or projected demand supports the investment. Prior to 2020, amenities chosen were guided based on productivity standards outlined in BFT Stop Guidelines and Amenities Policy. Presently, stops are assigned a label mainly based on weekday average ridership, which stipulates the minimum recommended amenities to be provided at fixed route stops based on the number of daily boardings. Other considerations include whether the stop is located on a Metro (frequent) Route, if the stop has a high wait time (frequency), and if the location has other constraints that would impede BFT’s ability to install assigned amenities (e.g. ROW constraints, property owner disapproval, jurisdictional disapproval).

Transit amenities are chosen based on groups and the frequency of use in the following ways:

- Basic: less 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 contains a multitude of jurisdictions, including six (6) cities spread across two (2) counties. Each jurisdiction has differing procedures, development patterns, and standards. They also have different ways of handling ROW permitting, other permitting, and the process BFT must take to perform work within the ROW. Considering the lack of consistent development adjacent to BFT fixed routes, policies that dictate transit amenity distribution often cannot be applied uniformly across BFT's service area. With that said, it is BFT's obligation to ensure that there is an equitable distribution of transit amenities to the best of the agency's ability (Table 17).

Table 17 – 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 |

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

Distribution of Transit Amenities (Fixed Route) Analysis As of April 20th, 2022, BFT's fixed route system includes 977 stops, of which there are 923 posted stops, and 54 flag stops. There are 46 shelters, ten (10) planned shelters (all shelters include a bench), 66 independent benches, and 117 trash cans (36 of which are the only amenity at the location). Flag stops are locations where no physical pole exists but where riders can flag down a bus as it arrives. BFT is in the process of phasing out the use of flag stops by posting physical stops at these locations or removing the designation if the stop is in an illogical location and experiences little to no ridership. Table 18 reflects amenities by route, note that amenities can be double counted if more than one (1) route serves the stop.

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 18 – Amenities by Route

| Route | Total Stops* | Posted Stops | Flag Stops | Shelters | Planned Shelters | Benches (includes shelter benches) | Garbage Cans | Length of Route (mi.) | Average Stop Spacing (ft.) |
|-------|--------------|--------------|------------|----------|------------------|------------------------------------|--------------|-----------------------|----------------------------|
| 1 | 63 | 63 | 0 | 6 | 1 | 15 | 14 | 28.6 | 2,256 |
| 3 | 44 | 41 | 3 | 5 | | 11 | 14 | 11.6 | 1,331 |
| 20 | 46 | 46 | 0 | 4 | | 10 | 11 | 13.8 | 1,481 |
| 25 | 32 | 32 | 0 | 0 | | 0 | 0 | 7.1 | 1,137 |
| 26 | 46 | 42 | 4 | 6 | 1 | 11 | 8 | 11.9 | 1,341 |
| 40 | 46 | 46 | 0 | 7 | | 9 | 11 | 14.3 | 1,511 |
| 41 | 125 | 118 | 7 | 3 | 1 | 7 | 10 | 29.5 | 1,180 |
| 42 | 61 | 60 | 1 | 5 | 1 | 9 | 13 | 14.1 | 1,190 |
| 47 | 96 | 92 | 4 | 3 | | 10 | 12 | 27.7 | 1,450 |
| 48 | 57 | 55 | 2 | 2 | | 7 | 9 | 16.8 | 1,424 |
| 64 | 28 | 27 | 1 | 0 | | 3 | 1 | 6.4 | 1,205 |
| 65 | 48 | 47 | 1 | 3 | | 6 | 5 | 13.7 | 1,478 |
| 66 | 48 | 47 | 1 | 1 | 2 | 2 | 2 | 15.9 | 1,740 |
| 67 | 52 | 50 | 2 | 2 | 4 | 6 | 5 | 15.7 | 1,596 |
| 110 | 90 | 83 | 7 | 6 | | 7 | 11 | 30.1 | 1,686 |
| 123 | 103 | 96 | 7 | 4 | 3 | 15 | 11 | 30.8 | 1,557 |
| 170 | 45 | 32 | 13 | 4 | | 6 | 5 | 67.1 | 5,205 |
| 225 | 72 | 66 | 6 | 3 | 4 | 5 | 5 | 27.9 | 1,966 |
| 268 | 60 | 56 | 4 | 4 | | 7 | 6 | 27.2 | 2,246 |

Note: Numbers do not reflect transit centers

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

| |
|-----------------|
| Minority Routes |
|-----------------|

Table 19 – 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 | 1,855.6 |
| Minority Routes | 704 | 54 | 87 | 95 | 1,645.5 |
| Non-minority Routes | 458 | 31 | 59 | 58 | 2,070.2 |

*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 Each major transit center and park & rides are located throughout BFT’s service area in locations that were deemed appropriate during the planning phases of their construction. BFT transit centers and park & rides have an equitable distribution of amenities. Given the different modes of service, safety and operational issues, and ridership levels, amenities such as benches, shelters, and lighting, are placed by need. Bike racks and lockers are also available at select facilities, though bike lockers are being phased out. With the COVID-19 pandemic that started in early 2020, public bathrooms became unavailable at facilities where BFT Customer Service staff work and have yet to become available again as of April 2022. A breakdown of amenity distribution at transit centers and park & rides are listed in Table 20 and 21.

Table 20 – 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 nd 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 |
| Stacy Avenue Transit Center | No | No | No | Yes | Minority |
| Ed Frost Transit Center | | | | Defunct | Minority |

Table 21 – 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 | 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 “TRAC” 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 on a monthly basis 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 1st through December 31st, 2021, concluded that there is 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 the course of a service day. Blocks that serve at least one minority route were designated as a minority block. Minority blocks were assigned vehicles that were built in 2015 on average, with a typical length of 40 ft. and a seating capacity of 37 seats. Non-minority blocks were assigned vehicles that were built in 2017 on average, with a typical length of 35 ft. and a seating capacity of 35 seats (Table 22).

Although minority blocks are assigned older vehicles on average, the vehicles that are assigned to these routes are larger and have higher seating capacities. The main reason minority blocks have an older average age is due to the fact that non-minority Routes 110 and 123 necessitate vehicles that are 35 ft. or less in length due to maneuvers through parking lots along these routes. The majority of buses that are 35 ft. and under are the newest vehicles in BFT’s fleet. This creates a situation where Routes 110 and 123 tend to be assigned newer vehicles.

Table 22 – Vehicle Assignment By Route

| Block | Most Frequent Assignment (Bus #) | Year | Length | Seating |
|--------------|---|-------------|---------------|----------------|
| 1-1 | 5308 | 2013 | 40 ft | 37 |
| 1-2 | 5264 | 2009 | 40 ft | 37 |
| 1-3 | 5307 | 2013 | 40 ft | 37 |
| 1-4 | 5333 | 2018 | 35 ft | 30 |
| 1-5 | 5262 | 2009 | 40 ft | 37 |
| 1-6 | 5336 | 2009 | 40 ft | 37 |
| 1-7 | 5319 | 2015 | 40 ft | 37 |
| 3-1 | 5316 | 2014 | 40 ft | 37 |
| 3-2 | 5314 | 2014 | 40 ft | 37 |
| 3-3 | 5313 | 2013 | 40 ft | 37 |
| 3-4 | 5320 | 2015 | 40 ft | 37 |
| 20-1 | 5306 | 2013 | 40 ft | 37 |
| 20-2 | 5307 | 2013 | 40 ft | 37 |
| 20-3 | 5308 | 2013 | 40 ft | 37 |
| 25-1 | 5002 | 2016 | 35 ft | 30 |
| 26-1 | 5309 | 2013 | 40 ft | 37 |
| 26-2 | 5310 | 2013 | 40 ft | 37 |
| 40-1 | 5323 | 2015 | 40 ft | 37 |
| 40-2 | 5309 | 2013 | 40 ft | 37 |
| 41-1 | 5310 | 2013 | 40 ft | 37 |
| 41-2 | 5339 | 2018 | 40 ft | 37 |
| 42-1 | 5338 | 2018 | 40 ft | 37 |
| 42-2 | 5259 | 2016 | 35 ft | 30 |
| 47-1 | 5335 | 2018 | 35 ft | 30 |
| 47-2 | 5313 | 2013 | 40 ft | 37 |
| 47-3 | 5316 | 2014 | 40 ft | 37 |
| 48-1 | 5001 | 2016 | 35 ft | 30 |
| 48-2 | 5324 | 2018 | 40 ft | 37 |
| 48-3 | 5321 | 2015 | 40 ft | 37 |
| 64-1 | 5258 | 2016 | 35 ft | 30 |
| 64-2 | 5327 | 2018 | 35 ft | 30 |
| 65-1 | 5253 | 2006 | 40 ft | 37 |

| | | | | |
|-------|------|------|--------|----|
| 65-2 | 5320 | 2015 | 40 ft | 37 |
| 66-1 | 5325 | 2015 | 40 ft | 37 |
| 67-1 | 5312 | 2013 | 40 ft | 37 |
| 110-1 | 5254 | 2007 | 29 ft | 23 |
| 110-2 | 5329 | 2018 | 29 ft | 23 |
| 123-1 | 5339 | 2018 | 29 ft | 23 |
| 123-2 | 5338 | 2018 | 29 ft | 23 |
| 123-3 | 5340 | 2016 | 29 ft | 23 |
| 123-4 | 5338 | 2016 | 29 ft | 23 |
| 170-1 | 5331 | 2018 | 35 ft | 30 |
| 225-1 | 5332 | 2018 | 40 ft | 30 |
| 225-2 | 5002 | 2009 | 35 Ft | 37 |
| 225-3 | 5333 | 2018 | 35 ft | 30 |
| 268-1 | 5345 | 2018 | 40 ft | 37 |
| 268-2 | 5319 | 2015 | 40 ft | 37 |
| 268-3 | 5262 | 2009 | 40 Ft. | 37 |

Minority Routes

Table 23 – Vehicle Assignments by Minority & Non-minority Blocks

| Weekday Average Load Factor | | | | | |
|------------------------------------|-----------|---------|--------|---------|------|
| Route | Direction | AM Peak | Midday | PM Peak | Late |
| 1 | E | 0.04 | 0.12 | 0.17 | 0.12 |
| | W | 0.07 | 0.13 | 0.15 | 0.11 |
| 3 | N | 0.08 | 0.14 | 0.23 | 0.18 |
| | S | 0.06 | 0.14 | 0.26 | 0.17 |
| 20 | E | 0.13 | 0.12 | 0.14 | 0.10 |
| | W | 0.07 | 0.11 | 0.19 | 0.16 |
| 25 | CW | 0.06 | 0.12 | 0.18 | 0.11 |
| 26 | N | 0.07 | 0.14 | 0.27 | 0.30 |
| | S | 0.05 | 0.14 | 0.29 | 0.29 |
| 40 | E | 0.04 | 0.09 | 0.17 | 0.18 |
| | W | 0.06 | 0.11 | 0.16 | 0.14 |
| 41 | CCW | 0.04 | 0.06 | 0.12 | 0.09 |
| | CW | 0.04 | 0.09 | 0.21 | 0.00 |
| 42 | E | 0.06 | 0.11 | 0.20 | 0.13 |
| | W | 0.09 | 0.13 | 0.18 | 0.12 |
| 47 | E | 0.07 | 0.13 | 0.19 | 0.18 |
| | W | 0.07 | 0.12 | 0.18 | 0.20 |

| | | | | | |
|-----|---|------|------|------|---------|
| 48 | E | 0.03 | 0.09 | 0.16 | 0.17 |
| | W | 0.06 | 0.11 | 0.15 | 0.14 |
| 64 | E | 0.03 | 0.11 | 0.24 | 0.39 |
| | W | 0.08 | 0.12 | 0.23 | 0.38 |
| 65 | E | 0.05 | 0.11 | 0.23 | 0.20 |
| | W | 0.12 | 0.12 | 0.20 | 0.20 |
| 66 | E | 0.06 | 0.09 | 0.15 | 0.14 |
| | W | 0.12 | 0.12 | 0.25 | 0.40 |
| 67 | E | 0.07 | 0.14 | 0.25 | 0.35 |
| | W | 0.07 | 0.11 | 0.16 | 0.10 |
| 110 | E | 0.06 | 0.08 | 0.12 | No Trip |
| | W | 0.03 | 0.07 | 0.13 | No Trip |
| 123 | N | 0.08 | 0.16 | 0.24 | 0.21 |
| | S | 0.09 | 0.16 | 0.23 | 0.18 |
| 170 | E | 0.06 | 0.14 | 0.11 | 0.08 |
| | W | 0.02 | 0.08 | 0.13 | 0.07 |
| 225 | E | 0.06 | 0.12 | 0.16 | 0.11 |
| | W | 0.07 | 0.12 | 0.15 | 0.11 |
| 268 | E | 0.02 | 0.08 | 0.16 | 0.17 |
| | W | 0.07 | 0.08 | 0.12 | 0.08 |

| | Minority Routes | | | |
|-----------------------------------|-----------------|--------|---------|------|
| | AM Peak | Midday | PM Peak | Late |
| System Average | 0.06 | 0.11 | 0.18 | 0.17 |
| Minority Route Average | 0.06 | 0.11 | 0.19 | 0.17 |
| Non-minority Route Average | 0.07 | 0.12 | 0.18 | 0.17 |

3.3 2018-2022 EQUITY ANALYSIS REVIEW

Service and Fare Changes

BFT defines a major service change as one that "affects at least 20% of a route's daily service hour allotment or geographic coverage." BFT prepares and submits all equity analyses that were conducted during the prior service monitoring period to FTA with the Title VI Program documents every three (3) years. Upon review, BFT made a major service change in September 2017 and June 2021 and has made no change to fares since 2012.

BFT prepares a Title VI analysis for fare and major service changes using the analysis guidance provided by the FTA. Additionally, BFT will continue to evaluate service as outlined in Title VI using the following process:

3.4 MAJOR SERVICE CHANGES IMPLEMENTED (2019-2022)

Multiple major service changes were made from 2019 through the beginning of 2022. The first major service change that occurred was the addition of Route 268 in 2020, which together with Route 225 provided 15-minute frequency between Pasco and Richland. Route 268 was preceded by a demonstration service, Route 68, which aimed to increase service in West Pasco. A service equity analysis was conducted and no adverse effects were anticipated.

In June of 2021, BFT implemented additional major service changes which created two new high-frequency corridors and realigned local services in Richland and Kennewick. These changes resulted in higher frequency service between all major transit centers in the service area, as well as new local service in Kennewick.

As part of the implementation process, BFT conducted a route-by-route Title VI service equity analysis with the intention of better understanding how the planned fixed route service changes would impact low-income and minority populations (Table 24). Details of this service equity analysis can be found in Appendix E.

Table 24 –2019 - 2022 Major Service Change Overview

| Route | Major Service Change | | Notes |
|-------|----------------------|---------------|---|
| | Route Alignment | Revenue Hours | |
| 1 | X | + | Combined Portions of Routes 126, 120, 150 and 160. Increased Service to Fixed 15-minute headways |
| 3 | X | + | Combined Portions of Routes 150 and 160. Increased Service to Fixed 15-Minute Headways |
| 20 | X | | Truncated Alignment of Route 120 at Knight St. |
| 26 | X | | Truncated Alignment of Route 126 at Knight St. |
| 40 | X | X | New 30-minute Kennewick route serving portions of Clearwater Ave., Kennewick Ave. Olympia St. and Dayton St. |
| 268 | X | X | New 30-minute route that serves CBC, Chiawana High School, and provides additional trips between Pasco and Richland |

3.5 FARE CHANGES IMPLEMENTED (2018 – 2022)

BFT has not implemented any fare policy changes since the 2018 Title VI update. BFT did not collect fares of any kind from March 2020 to October 2021 due to the COVID-19 Pandemic. Beginning in the summer of 2022, BFT will implement a 6-month fare-free program for children 18 and under.

CONCLUSION

Analysis of BFT services show that there is no significant disparate impact or disproportionate burden exists in how BFT distributes service or amenities within the PTBA. Similarly, recent service changes undertaken by BFT have resulted in an improvement in service to minority and low-income areas. BFT will continue to prioritize the needs of minority and low-income communities when planning for future service changes.



Executive Staff

Director General Interino
Director de Servicios Administrativos
Director de Operaciones
Directora de Recursos Humanos y Relaciones Laborales
Director de Planificación y Desarrollo de Servicios

Ed Frost
Jeff Lubeck
Ayodeji Arojo
Wendi Warner
Keith Hall

Ben Franklin Transit
1000 Columbia Park Trail
Richland WA, 99352
509.735.5100

BFT opera sus programas sin tener en cuenta la raza, el color y el origen nacional. Para recibir información adicional sobre las obligaciones de BFT en materia de discriminación, incluidos nuestros procedimientos de denuncia, póngase en contacto con el Coordinador del Título VI de BFT en el 509.734.5107.

Si necesita información en otro idioma, comuníquese al 509.735.5100.

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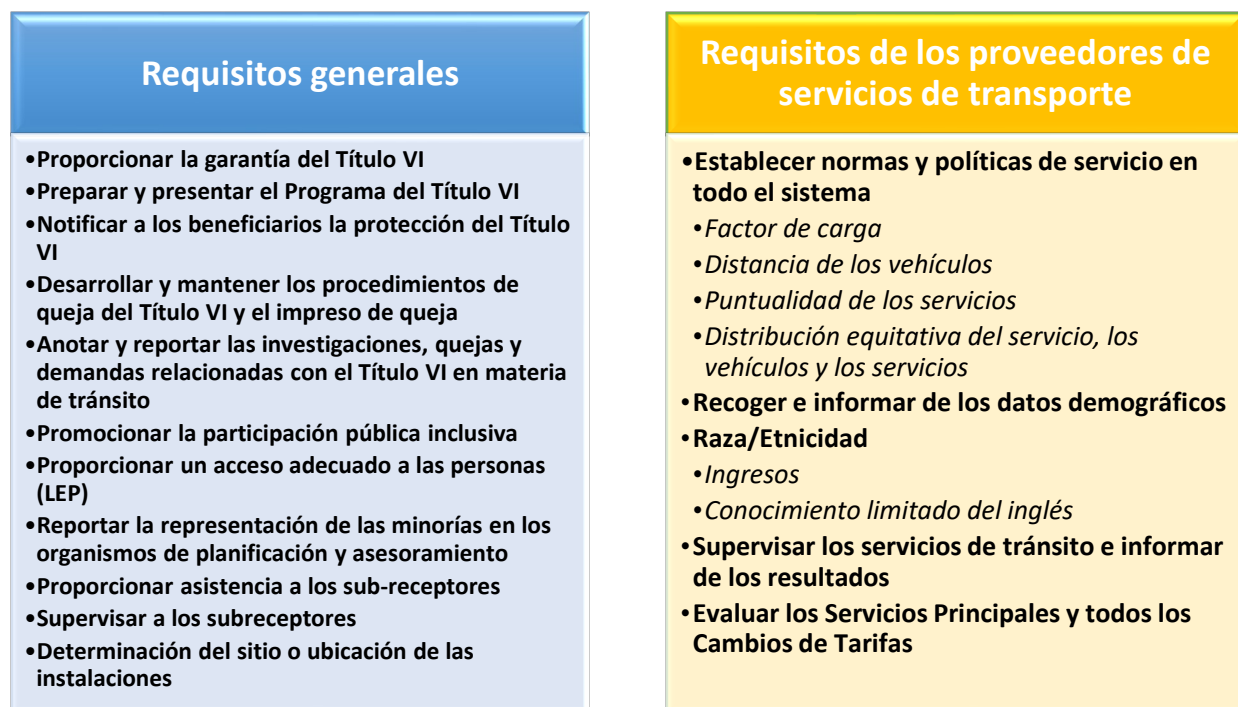
INTRODUCCIÓN

Ben Franklin Transit (BFT) proporciona servicios de transporte público en un área de beneficio de transporte público (PTBA) de 617 millas cuadradas dentro de los condados de Benton y Franklin, situados en el estado de Washington. La PTBA incluye los municipios de Kennewick, Pasco, Richland, West Richland, Benton City, Prosser y algunas zonas no incorporadas en los condados de Benton y Franklin. El funcionamiento de BFT se contabiliza en un único fondo empresarial, que utiliza el mismo método de contabilidad de ejercicio que una empresa privada. BFT no tiene subrecipientes y no transfiere los fondos de la FTA a los subrecipientes.

La población estimada del PTBA de BFT es de 276,784 habitantes en 2021 (Oficina de Administración Financiera del Estado de Washington), mientras que los condados de Benton y Franklin tienen una población combinada estimada de 304,895 habitantes (censo de 2020). El PTBA de BFT y las áreas circundantes consisten en una población diversa de la cual el 41.8% se identifica como minorías y el 14.3% de la población se considera de bajos ingresos. Para garantizar que estas poblaciones tengan un acceso equitativo a los servicios de tránsito, BFT ha preparado este Programa del Título VI y los documentos que lo acompañan de conformidad con el Título VI de la Ley de Derechos Civiles de 1964; el Título 49, Capítulo 53, Sección 5332 del Código de los Estados Unidos; y la Circular 4702.1B de la Administración Federal de Tránsito (FTA), "Directrices del Programa del Título VI para los Receptores de la Administración Federal de Tránsito", a partir del 1 de octubre de 2012.

El Programa del Título VI de BFT documenta el cumplimiento de los requisitos generales y de los proveedores de tránsito descritos en la Circular 4702.1B de la FTA y reafirma el compromiso de la agencia de garantizar que a ninguna persona se le niegue el acceso a sus servicios de tránsito por motivos de raza, color u origen nacional.

Figura 1 – Requisitos generales y requisitos de las empresas de transporte



1. REQUISITOS GENERALES DEL PROGRAMA DEL TÍTULO VI

Todos los recipientes de fondos de la FTA están obligados a documentar si cumplen con las normas del Título VI del DOT presentando un Programa del Título VI a su funcionario regional de derechos civiles de la FTA una vez cada tres años. Para cumplir con el Título VI de la Ley de Derechos Civiles de 1964; el Título 49, Capítulo 53, Sección 533 del Código de los Estados Unidos; y la Circular Federal 4702.1B de la FTA, la FTA requiere que todos los receptores de la FTA:

- Proporcionar la garantía del Título VI.
- Notificar al público sus protecciones en cumplimiento del Título VI.
- Desarrollar y mantener un procedimiento de quejas en virtud del Título VI.
- Anotar y reportar las investigaciones, quejas y demandas del Título VI.
- Promover la participación inclusiva a través de un proceso de participación pública establecido.
- Proporcionar un acceso adecuado a las poblaciones con conocimientos limitados de inglés (LEP).
- Reportar sobre la representación de las minorías en el consejo consultivo.
- Ayudar y supervisar a los subrecipientes en el cumplimiento del Título VI.
- Determinar si el sitio de una nueva instalación se selecciona de manera no discriminatoria.

El propósito de esta sección es demostrar los medios por los que BFT cumple estos requisitos generales de acuerdo con la Circular 4702.1B de la FTA.

Además, BFT opera sus programas y servicios en cumplimiento de la Orden Ejecutiva 12898, “Acciones Federales para Abordar la Justicia Ambiental en las Poblaciones de Minorías y Poblaciones de Bajos Ingresos”, la Orden Ejecutiva 13166, “Mejorar el Acceso al Servicio para las Personas con Dominio Limitado del Inglés” (LEP) y la asistencia financiera de la Administración Federal de Tránsito (FTA) con la orientación y las instrucciones necesarias para llevar a cabo las regulaciones del Título VI del Departamento de Transporte de los Estados Unidos (DOT) de conformidad con ambas Órdenes Ejecutivas. Aunque las personas con bajos ingresos y LEP no se mencionan específicamente como una clase protegida bajo el Título VI, BFT se compromete a cumplir con los requisitos del Título VI mientras se adhiere simultáneamente a los requisitos de Justicia Ambiental y LEP. Este compromiso con las comunidades marginadas se refleja en el proceso de planificación, participación pública y proceso de decisiones de la agencia.

1.1 GARANTÍA DEL TÍTULO VI

La sección 601 del Título VI de la Ley de Derechos Civiles de 1964 establece:

Ninguna persona en los Estados Unidos será excluida, por motivos de raza, color u origen nacional, de la participación en cualquier programa o actividad que reciba asistencia financiera federal, ni se le negarán los beneficios de la misma, ni será objeto de discriminación.

Como recipiente directo de fondos federales de la FTA, BFT está obligada a operar sus programas y servicios sin tener en cuenta la raza, el color y el origen nacional de acuerdo con el Título VI y otras leyes pertinentes. Para demostrar el cumplimiento del Título VI por parte de BFT, debe revisarse y actualizarse un Programa del Título VI cada tres años, como se indica en la Circular 4702.1B de la FTA.

1.2 TÍTULO VI AVISO AL PÚBLICO - DECLARACIÓN RELATIVA A LA AUSENCIA DE DISCRIMINACIÓN

BFT opera sus programas y servicios sin tener en cuenta la raza, el color o el origen nacional. Para asegurar que el público es consciente del compromiso de BFT de que a ninguna persona se le niegue el acceso a sus servicios de tránsito por motivos de raza, color u origen nacional, BFT notifica al público de sus protecciones del Título VI utilizando el siguiente texto de declaración:

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.

Si necesita información en otro idioma, comuníquese al 509.735.5100.

Esta declaración relativa a la ausencia de discriminación está publicada en inglés y en español en los pasillos del Edificio de Administración, del Edificio de Operaciones y del Centro de Atención al Cliente. Se harán esfuerzos para aumentar la visibilidad de la notificación del Título VI de BFT al público. Estos esfuerzos incluyen la evaluación de la viabilidad de la publicación de la declaración en los centros de tránsito y otras áreas de alto tráfico donde es probable que los clientes lo vean.

Una versión abreviada del Aviso al Público del Título VI de BFT se incluye en los libros de horarios, documentos de planificación externa y otros materiales informativos. La versión abreviada notifica al público de sus protecciones del Título VI utilizando el siguiente texto de declaración:

BFT no discrimina por motivos de origen étnico, color ni procedencia. Para recibir información adicional comuníquese con nosotros al 509.735.5100.

En el caso de que BFT distribuya fondos federales a otra entidad del gobierno o a un subrecipiente, BFT incluirá el lenguaje del Título VI en todos los acuerdos escritos y supervisará su cumplimiento.

Responsabilidades de la organización

El director general de BFT está autorizado a garantizar el cumplimiento de las provisiones de la política contra la discriminación en BFT y de la ley. Las subvenciones, los programas, el cumplimiento de las actividades y la coordinación del Título VI se llevarán a cabo bajo la autoridad del director general.

1.3 PROCEDIMIENTOS DE QUEJAS Y COMENTARIOS

Procedimientos generales para el comentario del público

La Política de comentarios de los clientes de BFT se ha establecido para asegurar que los clientes de todos los modos del sistema, incluyendo: el autobús, el paratransito, vanpool y los servicios contratados, tengan una forma fácil y accesible de dar su opinión a la agencia. BFT está abierta a escuchar cualquier opinión de los clientes, incluyendo quejas, comentarios, sugerencias o preocupaciones.

BFT recibe los comentarios del público de las siguientes maneras:

- **Tarjetas de comentarios del cliente sin gastos de envío** Disponibles en los vehículos de BFT y de los contratistas y en los puntos de venta de pases en español e inglés.
- **Correo de los Estados Unidos** 1000 Columbia Park Trail, Richland, WA 99352.
- **Teléfono** Los pasajeros pueden ponerse en contacto con el Departamento de Atención al Cliente de BFT 509.735.5100 o utilizar las líneas de comentarios públicos establecidas cuando estén disponibles.
- **Correo electrónico** Los pasajeros pueden ponerse en contacto con BFT por correo electrónico en contact@bft.org.
- **Language Line** Línea de idiomas: Para los pasajeros que hablan un idioma diferente al inglés, BFT utilizará los servicios de Language Line SolutionsSM para facilitar las llamadas. BFT también utiliza personal bilingüe para comunicarse con los clientes LEP.
- **En persona** Las tarjetas de comentarios están disponibles en el Centro de Atención al Cliente de Three Rivers (7109 W. Okanogan Place, Kennewick, WA 99336) o en el Edificio de Administración (1000 Columbia Park Trail, Richland, WA 99352).
- **Sitio web** Los pasajeros pueden dar su opinión en el sitio web de BFT, www.bft.org, en el enlace "Contáctenos". Google Translate está enlazado a nuestro sitio web y ayuda a la comunicación con los clientes LEP.

Proceso de revisión de los comentarios Todos los comentarios de los clientes son valorados. Cualquier persona que envíe un comentario, una queja o una sugerencia de servicio a BFT y solicite una respuesta recibirá una respuesta inicial en un plazo de 15 días laborables, siempre que facilite información de contacto legible.

El personal graba e investiga las quejas. Se hacen sugerencias y recomendaciones para el sistema con el fin de resolver las quejas, si es posible. Se adoptan las medidas adecuadas para abordar las quejas relativas al personal, los equipos o los procesos.

Información sobre la política La información sobre la Política de Comentarios del Cliente; incluyendo cómo entregar una queja, se pone a disposición de los pasajeros en nuestro libro de horarios, en nuestro sitio web, y en todos los puntos de venta, así como en nuestros vehículos.

Reportajes El personal preparará un sumario anual de los comentarios de los clientes para la Junta Directiva y los empleados, que se utilizará para revisar y evaluar el servicio.

Seguimiento BFT mantiene un sistema de seguimiento de todos los comentarios de los clientes.

Procedimiento de quejas en virtud del Título VI

BFT se compromete a garantizar que ninguna persona sea impedida de participar o se le nieguen los beneficios de sus servicios de tránsito por motivos de raza, color u origen nacional, tal como lo protege el Título VI en la Circular 4702.1.B de la FTA. Con este fin, BFT tiene un proceso de quejas en el lugar para el seguimiento y tratamiento de las quejas y reclamaciones de discriminación por motivos de raza, color u origen nacional.

Formalizar una queja en virtud del Título VI Las personas pueden presentar una queja escrita y firmada en un plazo máximo de 180 días a partir de la fecha de la supuesta discriminación. Se les aconseja que una queja debe incluir la siguiente información:

- Nombre, domicilio y forma de contactar con el demandante (por ejemplo, número de teléfono, dirección de correo electrónico, etc.).
- Cómo, cuándo, dónde y por qué creen que fueron discriminados. Las quejas deben incluir la ubicación, los nombres y la información de contacto de los testigos.
- Otros datos que consideren significativos.

La queja puede presentarse por escrito o poniéndose en contacto con BFT en la siguiente dirección o números de teléfono:

**Ben Franklin Transit
Coordinador del Título VI
1000 Columbia Park Trail
Richland, WA 99352-4851
Por teléfono: 509.734.5107
Por correo electrónico: TitleVICoordinator@bft.org
Por fax: 509.735.1800**

BFT recomienda a las personas que presenten quejas que aleguen discriminación por escrito o por vía electrónica. Todas las quejas deben ser firmadas por el demandante y presentadas dentro de los 180 días de una acción que surja bajo el Título VI. El Coordinador del Título VI organizará los ajustes razonables que sean necesarios.

Procedimiento de revisión de reclamaciones Todas las reclamaciones que aleguen discriminación por motivos de raza, color u origen nacional en un servicio o beneficio proporcionado por BFT serán tramitadas directamente por BFT. BFT también proporcionará la asistencia adecuada a los denunciantes, incluidas las personas con discapacidades o con capacidad limitada para comunicarse en inglés. Además, BFT hará todo lo posible por atender todas las quejas de forma rápida y rigurosa.

En los casos en que se necesite información adicional para la investigación de la reclamación, BFT se pondrá en contacto con el denunciante por escrito, a menos que se solicite lo contrario. Tenga en cuenta que, al responder a cualquier solicitud de información adicional, el hecho de que el denunciante no facilite la información solicitada puede dar lugar al cierre administrativo de la denuncia.

Una vez que BFT reciba la información suficiente para investigar la denuncia, preparará un borrador de respuesta por escrito sujeto a la revisión del abogado del tránsito. Si procede, el abogado de BFT puede cerrar administrativamente la queja. En este caso, BFT notificará la acción al denunciante lo antes posible.

Notificación del resultado de una reclamación BFT enviará una respuesta final por escrito al denunciante y le informará de su derecho a

- 1) Apelación dentro de los siete (7) días de calendario siguientes a la fecha de recibir la decisión final por escrito de BFT, y/o
- 2) Presentar una reclamación externa ante el DOT y/o la FTA

BFT hará todo lo posible para responder a las reclamaciones del Título VI dentro de los cinco (5) días laborales de la fecha de recibimiento de tales quejas, si no antes. Además del proceso de queja descrito anteriormente, un demandante puede presentar una queja del Título VI con las siguientes oficinas:

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

FTA Office of Civil Rights
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington DC 20590
Teléfono: 888.446.4511

Forma de queja del Título VI

La forma de queja del Título VI de BFT está disponible en línea, tanto en inglés como en español. Copias físicas de la forma están disponibles a petición de los denunciantes, y la forma se incluye en **Apéndice A**.

Protección contra retribuciones

Los clientes de BFT pueden presentar quejas y comentarios o participar en el proceso de participación pública sin temor a retribuciones por parte de la agencia. Si un cliente siente que está recibiendo un trato injusto en respuesta a los comentarios que ha presentado, debe ponerse en contacto con la Oficina del director general de BFT. BFT disciplinará adecuadamente a cualquier empleado o contratista que tome medidas de venganza contra un cliente.

1.4 [LISTA DE INVESTIGACIONES, QUEJAS Y DEMANDAS DEL TÍTULO VI](#)

Desde la presentación de la última actualización del Programa del Título VI de BFT en 2016, no hay investigaciones, quejas o demandas pendientes contra BFT en las que se alegue discriminación con respecto a las tarifas, las rutas, los horarios o la calidad del servicio de transporte por motivos de raza, color u origen nacional.

1.5 POLÍTICA DE PARTICIPACIÓN DEL PÚBLICO Y PROCESOS

Objetivo y declaración de la política

La política de BFT anima a que se hagan comentarios y sugerencias, incluyendo quejas sobre el Programa de Proyectos (POP) propuesto, cambios en el servicio, cambios en las tarifas, y varias políticas. El Título VI exige que se establezcan umbrales para este proceso de comentarios públicos. Las Políticas de Carga Desproporcionada y/o de Impacto Discriminatorio se incluyen en este documento como la aportación pública requerida por el estado y la intención de BFT de resolver cualquier preocupación con respecto a los cambios de servicio y de tarifas en el sistema.

Además, BFT promueve los comentarios sobre las políticas que pueden afectar a sus clientes y con frecuencia lleva a cabo encuestas, foros públicos y reuniones de puertas abiertas, además de este proceso formal. El registro de comentarios de los clientes documenta las preocupaciones o comentarios recibidos del público.

Procesos de participación pública

Los cambios que requieren un proceso público incluirán los cambios definidos en la política del Título VI de BFT. Otras políticas pueden ser tomadas a través de un Proceso de Opinión Pública a discreción del director general.

La participación del público se llevará a cabo para los cambios de servicio importantes, las cargas de impacto dispar, los proyectos de capital y los cambios de tarifas.

Un cambio de servicio importante se define como uno de los siguientes:

- Cualquier cambio en el servicio de cualquier ruta individual que elimine más del 20% de las horas de ingresos de la ruta. Todos los cambios de servicio importantes estarán sujetos a un análisis de equidad que incluya un análisis de los efectos adversos.
- Cualquier cambio en el que las horas de ingresos de todo el sistema asignadas a zonas minoritarias sean inferiores a la proporción de la población del área de servicio que reside en zonas minoritarias.

El impacto desigual se define como uno de los siguientes:

- Un cambio de servicio que conduce a un efecto adverso se define como una reducción geográfica o de tiempo en el servicio que incluye, pero no está limitado a la amplitud de los cambios de servicio, los cambios de frecuencia, la eliminación de segmentos de ruta, el cambio de ruta o la eliminación de rutas.
- Un cambio de servicio que podría dar lugar a una carga desproporcionada se produce cuando la población de bajos ingresos afectada negativamente por un cambio de tarifa o de servicio es un 20% más que la población media de bajos ingresos del área de servicio de BFT.
- Se produce un impacto dispar cuando el 20% o más de una reducción de las horas de ingresos del sistema se produce en zonas de minorías o de bajos ingresos.

- Programa de Proyectos (POP) incluido en el Plan de Desarrollo del Tránsito (TDP), el Programa de Mejora del Transporte (TIP), y los análisis de Justicia Ambiental (EJ).
- Cambios en las tarifas.

Procedimientos Para garantizar la máxima oportunidad de que el público participe en el proceso de decisiones relativas a los cambios importantes del servicio y los aumentos de las tarifas, BFT se adhiere a los siguientes procedimientos:

- Avisar con al menos 30 días de antelación sobre las audiencias públicas relativas a cambios importantes en el servicio o aumentos de tarifas en español e inglés.
- Los clientes, el público y la comunidad serán informados del cambio propuesto, del proceso de comentarios y de las audiencias públicas mediante cualquiera de los siguientes medios: anuncios en el periódico, comunicados de prensa multimedia, folletos a bordo, anuncios en las oficinas de BFT y el sitio web de BFT. Todos los medios están en español e inglés.
- Las propuestas de cambios importantes en el servicio y los aumentos de tarifas se presentarán a la Red de Asesoramiento a los Ciudadanos (CAN) de BFT para su debate, revisión y comentario. La CAN es un grupo de ciudadanos que incluye representantes de los discapacitados, institutos educativos, empleadores importantes y porciones LEP de nuestra base de clientes.
- Todas las opiniones y comentarios, incluidas las actas de las audiencias públicas, las recomendaciones del CAN y las recomendaciones del personal de BFT, se proporcionarán al Consejo de Administración de BFT antes de tomar cualquier decisión relativa a cambios en cualquier Programa de Proyectos, servicio principal, tarifa y otras políticas. En todas las audiencias públicas hay intérpretes para traducir la información y tomar los comentarios.
- BFT está trabajando para reinventar y reactivar el grupo CAN en 2022.

Difusión de la información

BFT se ha comprometido a que todo el personal asociado a la organización conozca los requisitos y las buenas prácticas del Título VI. Además, BFT hace todo lo posible por asegurarse de que los operadores de los vehículos reciban una formación adecuada sobre los componentes del Título VI y, lo que es más importante, sobre el trato de los clientes LEP. Adicionalmente, el Consejo de Administración de BFT esta informado con frecuencia durante el proceso de actualización del Título VI, recibiendo información del oficial del Título VI sobre los requisitos del Título VI y la política de BFT con respecto a su cumplimiento. Estas son algunas de las formas en que BFT difunde la información sobre el Título VI al público y a través de todos los niveles de la organización, desde el operador hasta su Consejo de Administración.

1.6 PLAN DE ASISTENCIA LINGÜÍSTICA

La población del PTBA de BFT es diversa y está compuesta por un número considerable de personas que tienen un dominio limitado o no tienen conocimientos de inglés. Estas personas se conocen como personas con conocimientos limitados de inglés (LEP). Las personas LEP se definen como aquellas personas para las que el inglés no es su idioma principal y que tienen una capacidad limitada para leer,

escribir, hablar o entender el inglés. Las personas LEP incluyen a quienes declararon al censo de los Estados Unidos que hablan inglés "menos que muy bien", "no bien" o "nada".

Para analizar y atender las necesidades de las poblaciones LEP, BFT ha desarrollado un Plan de Asistencia Lingüística que describe las estrategias de divulgación para garantizar que las personas LEP tengan un acceso significativo a sus programas y servicios. Estas estrategias de divulgación se desarrollaron mediante la realización de un análisis de cuatro factores de acuerdo con las directrices del Departamento de Transporte sobre las personas con capacidad limitada de inglés. El plan de asistencia lingüística de BFT y el análisis de cuatro factores que lo acompaña se incluyen en **Apéndice B**. BFT está trabajando en la adopción de una política que dicte cómo se actualiza e implementa el Plan de Asistencia Lingüística. El plan será supervisado por el equipo de marketing, que también supervisa el servicio de atención al cliente. El equipo de marketing se encarga de que la agencia se comunique efectivamente con el público asegurándose de incluir a las personas con conocimientos limitados de inglés.

1.7 MIEMBROS MINORITARIOS DE LOS COMITÉS NO ELEGIDOS Y CONSEJOS

BFT cuenta con un consejo consultivo que no está elegido: La red consultiva de ciudadanos (CAN). El CAN se reúne trimestralmente según sea necesario. Tenga en cuenta que, debido a la pandemia de COVID-19, la Red de Consultivos Ciudadanos no se ha reunido desde la primavera de 2020. BFT restablecerá el comité en 2022.

A partir del 1 de abril de 2019, 3 de los 10 miembros del CAN se autoidentifican como parte de una población minoritaria (Tabla 1). BFT recluta activamente y continúa buscando a grupos comunitarios para encontrar individuos diversos adicionales para representar a su organización o grupo de interés en el CAN. En la página web de BFT están disponibles las aplicaciones y la información sobre el CAN, tanto en inglés como en español.

Los miembros del CAN de BFT representan a diversos grupos de intereses y organizaciones. La representación de los miembros del CAN incluyen:

- Aire limpio/Carreteras en buen estado/Defensor de la energía
- Cámara de Comercio y Desarrollo Económico
- Cámara de Comercio Hispana de Tri-Cities
- Desarrollo de los niños
- Servicios humanos/Proveedores de servicios para personas ancianas
- Ejecución de la ley
- Defensor de la salud mental
- Defensor de los discapacitados
- Principales empleadores
- Ex operador de ruta fija
- Ex miembro del Consejo de Administración
- Pasajeros de la ruta fija
- Pasajeros de Dial-A-Ride
- Pasajeros de Vanpool

Tabla 1 – Participación de las minorías en los comités y consejos que no han sido elegidos

| Raza / Etnicidad | Red de Consultivos Ciudadanos % (Individuos) | Población general % |
|---|--|---------------------|
| Afroamericano / Negro | 10% (1) | 1.4% |
| Indígenas americanos y nativos de Alaska | 0% | 0.5% |
| Personas asiáticas | 0% | 2.6% |
| Nativos de Hawai y otras islas del Pacífico | 0% | 0.2% |
| Otros | 0% | 4.7 % |
| Personas de origen hispano o latino | 20% (2) | 33.2% |
| Caucásico/Blanco (no hispano) | 70% (7) | 57.8% |
| Minorías % | 30% (3) | 42.2% |

1.8 CONTROL DE LOS SUBRECIPIENTES

Por el momento, BFT no tiene subreceptores y no transfiere fondos de la FTA a ningún subreceptore. Si BFT comienza a asignar fondos a un subreceptore, se tomarán medidas para garantizar que el subreceptore o está operando sus programas sin tener en cuenta la raza, el color y el origen nacional.

De acuerdo con el 49 CFR 21.9(b), BFT proporcionará al subreceptore:

1. Ejemplos de avisos al público en los que se informa a los beneficiarios de sus derechos en virtud de la normativa del DOT sobre el Título VI, los procedimientos sobre cómo presentar una reclamación en virtud del Título VI y el formulario de reclamación del destinatario en virtud del Título VI.
2. Ejemplos de procedimientos para el seguimiento y la investigación de las Quejas del Título VI presentadas ante un subreceptore r, y cuándo espera el receptor primario que el subreceptore notifique al receptor primario las quejas recibidas por el subreceptore.
3. Información demográfica sobre la raza y el nivel de inglés de los residentes a los que presta servicio el subreceptore. Esta información ayudará al subreceptore a evaluar el nivel y la calidad del servicio que presta a las comunidades de su área de servicio y a evaluar la necesidad de asistencia lingüística.
4. Cualquier otro dato generado u obtenido por el beneficiario, como: patrones de viaje, encuestas, etc., que ayuden a los subreceptores a cumplir con el Título VI.

Para asegurarse de que los subreceptores cumplen con el reglamento del Título VI del DOT, BFT supervisará el cumplimiento de dicho reglamento por parte de sus subreceptores. Si un subreceptore no cumple con los requisitos del Título VI, BFT tampoco está en cumplimiento. Para que tanto BFT como el subreceptore cumpla con los requisitos del Título VI, se implementarán los siguientes procedimientos:

1. Documentar su proceso para garantizar que todos los subrecipientes cumplan con los requisitos generales de presentación de informes de esta circular, así como con otros requisitos que se apliquen al subrecipiente en función del tipo de entidad y del número de vehículos de ruta fija que opera en el servicio máximo si es un proveedor de transporte.
2. Recoger los Programas del Título VI de los subrecipientes y revisar los programas para su cumplimiento.
3. A petición de la FTA, en respuesta a una queja de discriminación, o como se considere necesario por BFT, BFT solicitará que los subrecipientes que prestan servicios de transporte verifiquen que su nivel y calidad de servicio se proporciona sobre una base equitativa de acuerdo con la Circular 4702.1B de la FTA Cap. III-11. Los subrecipientes que prestan servicios de transporte de ruta fija son responsables de informar según se indica en el Capítulo IV de esta Circular.

1.9 ANÁLISIS DE EQUIDAD PARA LA CONSTRUCCIÓN DE NUEVAS AMENIDADES

BFT consultará con la FTA para asegurarse de que el nivel adecuado de análisis ambiental para los proyectos de capital propuestos sea coherente con la Ley Nacional de Política Ambiental (NEPA) y la Ley Estatal de Política Ambiental (SEPA) del Estado de Washington. Cuando haya que preparar una exclusión categórica, una evaluación ambiental o una declaración de impacto ambiental, BFT se asegurará de que se integren los análisis de Justicia Ambiental, de acuerdo con la Sección IV 8 de la Circular 4702.1B de la FTA. Además, a medida que se desarrollen los proyectos, se implementará un programa inclusivo de divulgación y participación pública para garantizar que el público tenga oportunidades tempranas y continuas de participar en el proceso.

Como ya se ha dicho, los proyectos de capital de BFT cumplen con los requisitos de la NEPA y la SEPA. Una vez que la FTA haya desarrollado una guía sobre la visualización de las instalaciones, BFT se adherirá a dicha guía. Mientras tanto, BFT tomará las medidas adecuadas para mitigar cualquier impacto negativo o carga que los futuros proyectos de capital tengan en las poblaciones de bajos ingresos y de las minorías dentro del PTBA de BFT.

Lista de proyectos planeados

Proyectos de 2019 - 2025

- Centro de Tránsito Queensgate
- Centro de Tránsito del centro de Pasco
- Centro de Tránsito de West Pasco / Broadmoor
- Ampliación del edificio de operaciones
- Renovación del edificio de mantenimiento
- Construcción de paradas de autobús con cemento e instalación de amenidades
- Actualización de la señalización de las paradas de autobús

1.10 APROBACIÓN DE LA JUNTA DEL PROGRAMA DEL TÍTULO VI

(Apéndice G)

2. PROGRAMA DEL TÍTULO VI REQUISITOS DEL PROVEEDOR DE TRÁNSITO

Para cumplir con el Título VI de la Ley de Derechos Civiles de 1964, el Título 49, Capítulo 53, Sección 533 del Código de los Estados Unidos y la Circular Federal FTA 4702.1B, la FTA requiere que todos los proveedores de tránsito establezcan normas y políticas de servicio para todo el sistema en relación con:

- Factor de Carga
- La frecuencia de los vehículos
- El rendimiento de la puntualidad
- Distribución equitativa de servicios, vehículos y comodidades

Además, BFT ha sido designado como un proveedor de tránsito que opera 50 o más vehículos de ruta fija en servicio máximo y se encuentra en una UZA de 200,000 o más habitantes. Esta designación significa que BFT tiene más requisitos. Estos requisitos estipulan que BFT haga lo siguiente cada tres años:

- Compilar y reportar los datos demográficos del servicio.
- Supervisar e informar sobre todos los servicios de tránsito de ruta fija en relación con las normas y políticas de servicio.
- Evaluar los cambios de servicio principales y todos los cambios de tarifas.

Esta sección demostrará los medios por los que BFT cumple con estos requisitos que son específicos para los proveedores de tránsito de acuerdo con la Circular 4702.1B de la FTA.

2.1 NORMAS DE SERVICIO

Resumen

Las normas de servicio se utilizan para guiar la implementación de nuestras decisiones de planificación de servicios, incluyendo la estructura del sistema, la alineación de las rutas, la ubicación de las paradas, el alcance y la frecuencia del servicio y las áreas de la comunidad a la que se presta el servicio. La siguiente sección describe una serie de normas de servicio para todo el sistema que cumplen con los requisitos de las normas de servicio del Título VI. El Título VI requiere que todos los proveedores de tránsito de ruta fija desarrollen las normas cuantitativas para todos los modos de operación de ruta fija para los indicadores que se mencionan abajo. BFT sólo opera el servicio de autobús de ruta fija, por lo tanto, todas las normas de servicio se aplican a este modo. Los siguientes objetivos se utilizan para cumplir con las normas de servicio por el Título VI Circular FTA C 4702.1B. Estas normas de servicio fueron adoptadas inicialmente por el Consejo de Administración en 1982 con revisiones de la actualización del Programa del Título VI en 2016 y 2019 (**Apéndice F**).

Objetivos de las normas de servicio Para asegurar el cumplimiento de cada modo y método, se supervisan las siguientes métricas:

- Factor de Carga
- La frecuencia de los vehículos
- El rendimiento de la puntualidad
- Disponibilidad del servicio

Norma de carga de los vehículos

BFT ha adoptado una norma de carga de 1.25 para su servicio de rutas fijas durante el período de funcionamiento máximo y no debe exceder las capacidades alcanzables de los vehículos (Tabla 2). Un 1.25 indica que todos los asientos están ocupados y que no hay más de un 25% de los pasajeros de pie. Si se observa que un viaje/ruta alcanza o supera sistemáticamente el factor de carga de 1.25, se tomarán medidas para aumentar la frecuencia o sobrecargar el servicio para minimizar la sobrecarga.

Tabla 2 – Factor de carga máxima Umbrales estándar Vehículo

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

El personal de BFT ha determinado que no es necesario desarrollar una norma de carga de vehículos para sus servicios de respuesta a la demanda debido a que la mayoría de los viajes de paratransito incluyen un solo cliente y la carga de promedia es menor de dos (2) clientes en los vehículos al mismo tiempo.

Normas sobre la frecuencia de los vehículos

Las frecuencias de las rutas de BFT se modifican en respuesta a la demanda de pasajeros y al potencial del negocio, utilizando los factores de carga, la productividad y el crecimiento del desarrollo como base para el proceso de planificación. Las frecuencias actuales de los vehículos varían entre 15 y 60 minutos, aparte de la Ruta 170, que corre cada 120 minutos. En 2021, BFT implementó dos rutas de corredor de alta frecuencia (Rutas 1 y 3) que funcionan con frecuencias fijas de 15 minutos. Estas rutas ofrecen un servicio de alta frecuencia entre el centro de tránsito de la calle Knight. (Richland), el centro de tránsito de Three Rivers (Kennewick) y el centro de tránsito de la avenida 22 (Pasco).

Norma de rendimiento de puntualidad

La puntualidad de los autobuses varía dependiendo del modo de transporte. La ruta fija opera entre cero (0) y cinco (5) minutos antes de que un autobús de ruta fija se considere tarde. La respuesta a la demanda opera entre cero (0) y 15 minutos antes de que se considere que un vehículo de paratránsito con respuesta a la demanda llega tarde.

Normas de disponibilidad del servicio

BFT distribuye el servicio de autobús en ruta fija basándose principalmente en la demanda observada, las tendencias de la población y el uso del suelo. En 2020, BFT implementó un nuevo servicio CONNECT a demanda para extender el servicio de tránsito a las áreas donde la demanda no justifica el servicio de ruta fija programada. A través de CONNECT, BFT se esfuerza en asegurar que todos los residentes del PTBA puedan acceder a los servicios de ruta fija o a demanda.

El servicio de paratránsito de DAR opera sobre la base de la elegibilidad en toda la PTBA, con una tarifa regular cuando el origen y el destino están dentro de $\frac{3}{4}$ de milla del límite del servicio, y con una tarifa premium cuando el origen o el destino está más allá de $\frac{3}{4}$ de milla del límite del servicio.

2.2 POLÍTICAS DE SERVICIO

Resumen

La siguiente sección incluye una serie de políticas de servicio para todo el sistema que cumplen con los requisitos del Título VI. El Título VI requiere que todos los proveedores de tránsito de ruta fija desarrollen normas para todos los modos de operación de ruta fija. Los siguientes indicadores enumerados a continuación son lo que se requiere de acuerdo con el Título VI Circular FTA C 4702.1B:

Objetivo de las políticas de servicio Los siguientes objetivos de la política de servicios se utilizan para garantizar el cumplimiento de cada modo y método:

- Supervisar la distribución de las amenidades de tránsito
- Supervisar la asignación de vehículos

Distribución de Amenidades en Tránsito

Distribución La inversión y la distribución equitativa de amenidades de tránsito por parte de BFT se basan en varios factores. El principal factor que se tiene en cuenta es la demanda de transporte, que se ve impulsada por el desarrollo existente y previsto en las comunidades a las que BFT da servicio.

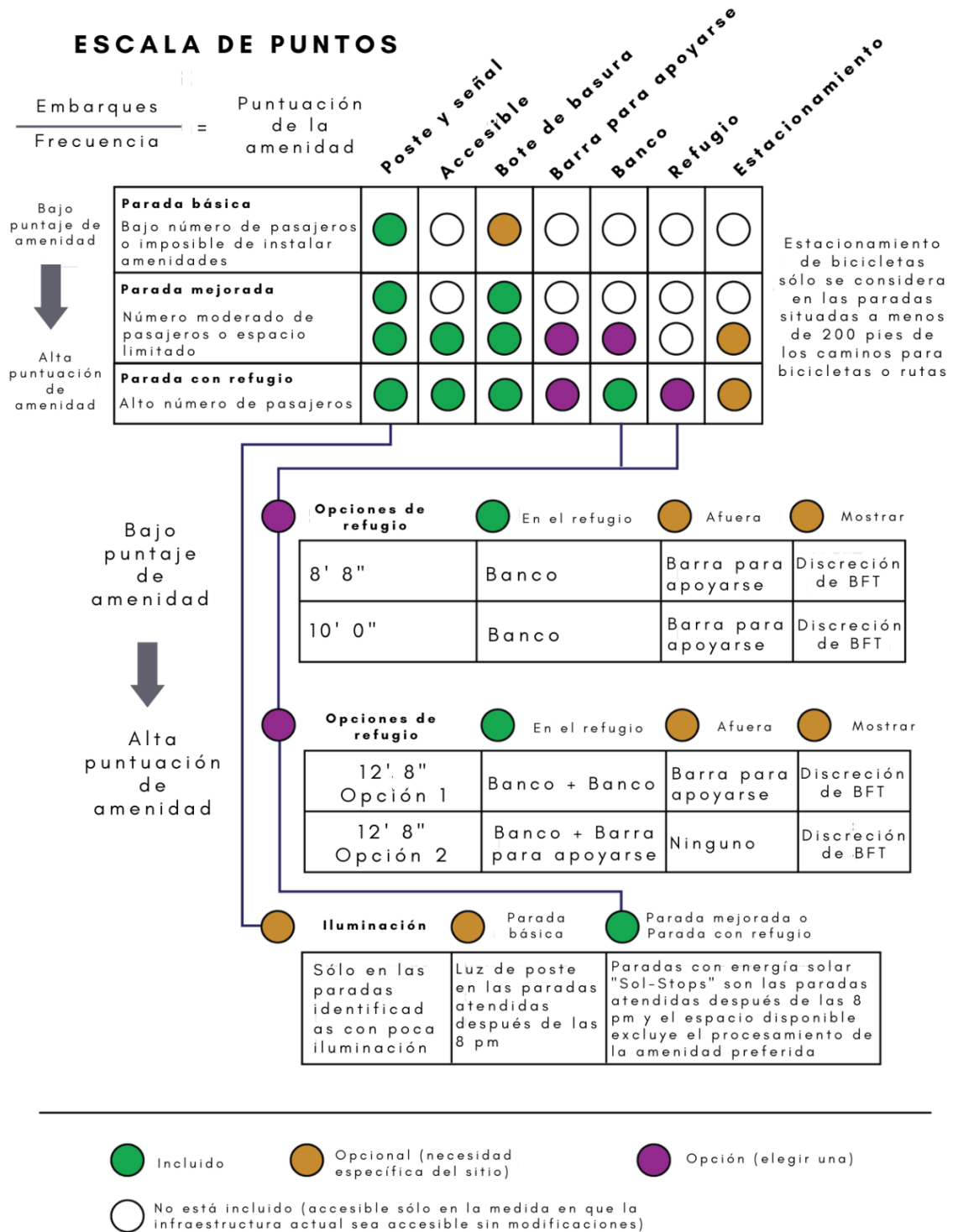
La distribución de amenidades se guió originalmente por los estándares de productividad descritos en las Directrices de Parada y Política de Amenidades de BFT, adoptadas por el Consejo de Administración de BFT en mayo de 2018. BFT está trabajando actualmente en la actualización de esos estándares para reflejar las "lecciones aprendidas" de la implementación de la primera ronda de mejoras. Este documento reflejará los estándares actualizados. BFT utiliza una puntuación basada en el número de pasajeros y la frecuencia (figura 2) para definir qué comodidades van en una ubicación, así como el desarrollo proyectado al que sirve la parada. La disponibilidad del derecho de paso (ROW) define el grupo de preparación prioritaria en el que se encuentra la parada, y el grupo de preparación prioritaria define el tipo de calendario en el que se encuentra la parada para esas mejoras.

A las paradas se les asigna una etiqueta basada en una puntuación que se calcula dividiendo los embarques por la frecuencia de la ruta, que estipula las amenidades mínimas recomendadas que deben proporcionarse en las paradas de rutas fijas.

Las etiquetas se clasifican de la siguiente manera:

- Básico: menos de cinco (5) embarques de promedio entre semana.
- Mejorado: de cinco (5) a 15 embarques de promedio entre semana.
- Refugio del autobús: Más de 15 subidas de promedio entre semana.

Figura 2 – Selección de amenidades



Los umbrales de embarque entre semana se basan en las mejores prácticas contenidas en el Informe 19 del TCRP y luego se han adaptado y modificado para BFT (Tabla 3– Distribución de los amenities por parada (media de embarque entre semana)Tabla 3). Otras consideraciones para la ubicación de los servicios incluyen si la parada está situada en una ruta de metro, y si la ubicación tiene otras limitaciones que impedirían la capacidad de BFT para instalar los servicios asignados sugeridos (por ejemplo, las limitaciones de ROW, la desaprobación del propietario, la desaprobación jurisdiccional).

El área de servicio de BFT contiene una multitud de jurisdicciones, incluyendo seis (6) ciudades repartidas en dos (2) condados. Cada jurisdicción tiene diferentes procedimientos, patrones de desarrollo y normas. También tienen diferentes maneras de manejar los permisos de ROW, otros permisos, y el proceso que BFT debe tomar para realizar el trabajo dentro de la ROW. Teniendo en cuenta la falta de desarrollo consistente adyacente a las rutas fijas de BFT, las políticas que dictan la distribución de los servicios de tránsito a menudo no se pueden aplicar de manera uniforme en toda el área de servicio de BFT. Dicho esto, es obligación de BFT garantizar una distribución equitativa de los servicios de tránsito en la medida de sus posibilidades.

Tabla 3– Distribución de los amenities por parada (media de embarque entre semana)

| Amenidad | Básico <5 embarques diarios | Mejorado 5-15 embarques diarios | Refugio >15 embarques diarios |
|--|--|---------------------------------------|-------------------------------------|
| Sin restricción al estacionamiento | <i>Recomendado en todas las paradas</i> | | |
| Plataforma de aterrizaje ADA de 5' x 8' y espacio libre en el suelo de 3' x 5' | <i>Se requiere en todas las paradas, a menos que esté razonablemente justificado</i> | | |
| Señal de parada de autobús en poste separado | <i>Recomendado en todas las paradas</i> | | |
| Barra para apoyarse | Opcional | Opcional | Opcional |
| Banco | Opcional | Recomendado | Ofrecer |
| Refugio | Opcional | Opcional | Recomendado |
| Vitrina | Opcional | Opcional | Opcional |
| Iluminación | Opcional | Opcional | Recomendado |
| Bote de basura | Opcional | Recomendado | Ofrecer |
| Tablero de información para los pasajeros | Opcional | Recomendado | Ofrecer |
| Soporte para bicicletas * | Opcional | Opcional | Opcional |
| Estación de reparación de bicicletas * | Opcional | Opcional | Opcional |

*Infraestructura para bicicletas recomendada en lugares cerca de caminos multiusos/rutas para bicicletas

Después de determinar las amenidades asignadas y de revisar el diseño necesario para esas amenidades en las Normas de Diseño de Paradas de Autobús de BFT, las paradas se colocan en grupos de prioridad. La preparación del grupo de prioridad indica a BFT cómo y cuándo se aborda la parada y se determina en última instancia accediendo al ROW en cada ubicación o ubicación propuesta a través del sitio web del asesor del condado correspondiente. Las paradas del grupo 1 están listas para ser instaladas, las del grupo 2 están listas para ser construidas (tanto para los servicios como para hacer que la parada cumpla con la ADA), las del grupo 3 son cuando una parada está fuera del ROW y necesitará un acuerdo con el dueño de la propiedad para hacer trabajos en la parada, y las del grupo 4 son cuando el sitio necesita un diseño específico/personalizado (por ejemplo, un muro de contención). A medida que se completan los trabajos en la parada, se desciende por los grupos (Figura 3).

Figura 3 – Grupos de "preparación" en las paradas de autobús



Acceso al tránsito

El servicio de rutas fijas de BFT tiene un promedio de una parada cada $\frac{1}{4}$ de milla en la mayoría de las rutas fijas y ofrece paradas de bandera para los clientes siempre que se cumplan las normas de seguridad. Las paradas de bandera son lugares donde no existe un poste físico, pero donde los pasajeros pueden hacer señas al autobús cuando llega. BFT está en proceso de eliminar progresivamente el uso de las paradas con banderines, colocando paradas físicas en estos lugares o eliminando la designación si la parada está en un lugar ilógico y experimenta poco o ningún número de pasajeros. Además, BFT trabaja con diligencia para satisfacer la demanda de ubicación de las paradas según lo solicitado por el público. Para la planificación y evaluación del servicio, BFT asume que la distancia que los clientes recorrerán para acceder al servicio de ruta fija urbana local es de $\frac{1}{2}$ milla.

Asignación de vehículos

Los vehículos de ruta fija se asignan en función de los requisitos operativos de la ruta, como la altura/tamaño, la capacidad de la ruta y el radio de giro. El despacho completa las asignaciones de autobuses mensualmente, asignando autobuses específicos a bloques operativos concretos. Los autobuses retenidos por mantenimiento u otras razones se sustituyen diariamente por autobuses de la lista de reserva. Los conductores reciben un número de autobús cuando se registran en el despacho. Los vehículos se asignan a las rutas en función de la capacidad de los usuarios y de la necesidad prevista de capacidad. Los vehículos del mismo tamaño se utilizan indistintamente cuando se asignan las rutas diarias. Por lo tanto, los vehículos más nuevos circulan tanto en los barrios de minorías como en los que no lo son. La edad de la flota también se tiene en cuenta a la hora de asignar los vehículos a diferentes rutas/bloques.

2.3 PERFIL DEMOGRÁFICO Y DEL ÁREA DE SERVICIO

Resumen

El título 49 CFR 21.9(b) afirma que los receptores "deben tener acceso a datos raciales y étnicos que reflejen qué grupos minoritarios son beneficiarios de los programas que reciben ayuda financiera federal". Para garantizar el cumplimiento de esta normativa, el personal de BFT recopila y analiza datos sobre la raza, la situación económica, las lenguas habladas por los participantes, los beneficiarios, los servicios de tránsito y los programas. Este análisis concluyó que se estima que la población del PTBA de BFT y sus alrededores está formada por un 41.8% de personas pertenecientes a minorías y que el 14.3% de la población tiene unos ingresos familiares iguales o inferiores al umbral federal de pobreza. Se considera que el 12.3% de los residentes tienen un dominio limitado del inglés y están clasificados como personas LEP.

Los datos del Censo de los Estados Unidos se utilizaron para crear mapas que representan los perfiles demográficos. Durante este proceso se utilizaron las estimaciones quinquenales de la Encuesta sobre la Comunidad Estadounidense 2015-2020, las estimaciones quinquenales de la Encuesta sobre la Comunidad Estadounidense 2014-2019 y los resultados del Censo 2020. Se utilizó un programa de Sistema de Información Geográfica (SIG), así como una aplicación de mapas de terceros conocida como Remix, para crear representaciones visuales geográficas de los datos (Tabla 4 - 5).

Se tomaron las siguientes medidas para garantizar que este análisis se realizara de acuerdo con la Circular 4702.1B de la FTA:

- Medir el porcentaje de población de minorías en todos los tramos del censo.
- Establecer los porcentajes de minorías para el total del área de servicio y las áreas circundantes.
- Determinar qué tramos censales tienen poblaciones de minorías iguales o mayores que el porcentaje total de minorías para las áreas de servicio.
- Establecer los porcentajes de minorías para el área de servicio total y dentro de ¼ de milla de una ruta fija.

Tabla 4 – Rutas de minorías y de bajos ingresos de BFT por porcentaje de población

| Área de servicio Promedio de minorías | Área de servicio Promedio de bajos ingresos |
|---------------------------------------|---|
| 41.8% | 14.3% |

Fuente: Oficina del Censo de Estados Unidos, estimaciones quinquenales de la ACS para 2015-2020

Tabla 5 – Distribución de minorías y bajos ingresos por ruta

| Ruta | Porcentaje de minorías (¼ de milla) | Porcentaje de bajos ingresos (¼ de milla) | Ruta de las minorías |
|------|-------------------------------------|---|----------------------|
| 1 | 56% | 23% | Sí |
| 3 | 81% | 26% | Sí |
| 20 | 22% | 12% | |
| 25 | 26% | 15% | |
| 26 | 29% | 13% | |
| 40 | 55% | 31% | Sí |
| 41 | 47% | 21% | Sí |
| 42 | 53% | 27% | Sí |
| 47 | 40% | 15% | |
| 48 | 45% | 16% | Sí |
| 64 | 89% | 26% | Sí |
| 65 | 92% | 22% | Sí |
| 66 | 55% | 18% | Sí |
| 67 | 63% | 14% | Sí |
| 110 | 27% | 6% | |
| 123 | 30% | 10% | |
| 170 | 41% | 15% | |
| 225 | 54% | 11% | Sí |
| 268 | 59% | 16% | Sí |

Fuente: Datos del censo de Estados Unidos de 2020

Raza y etnicidad

La raza y la etnicidad se analizan identificando las poblaciones minoritarias que viven dentro o en las proximidades del área de servicio de BFT. Las poblaciones minoritarias se clasifican como un grupo fácilmente identificable de personas minoritarias que viven en la proximidad geográfica.

Las poblaciones minoritarias incluyen a las personas que se identifican como:

- **Indio americano y nativo de Alaska:** Persona que tiene orígenes en cualquiera de los pueblos originarios de América del Norte y del Sur (incluida América Central), y que mantiene la afiliación tribal o el compromiso con la comunidad.
- **Asiático:** Una persona con orígenes en cualquiera de los pueblos originarios del Lejano Oriente, el Sudeste Asiático o el subcontinente indio, incluyendo, por ejemplo, Camboya, China, India, Japón, Corea, Malasia, Pakistán, las Islas Filipinas, Tailandia y Vietnam.
- **Negro o afroamericano:** Persona con orígenes en cualquiera de los grupos raciales negros de África.
- **Hispano o latino:** Una persona de cultura u origen cubano, mexicano, puertorriqueño, sudamericano o centroamericano, o de otra cultura u origen español, independientemente de su raza.
- **Nativo de Hawai o de otras islas del Pacífico:** Una persona a personas que tienen orígenes en cualquiera de los pueblos originales de Hawái, Guam, Samoa u otras islas del Pacífico.
- **Dos o más razas/ Alguna otra raza:** Sexta categoría que una persona puede identificar si las categorías anteriores no se aplican.

Área predominantemente minoritaria significa un área geográfica, como un vecindario, una zona censal, una cuadra o un grupo de cuerdas, o una zona de análisis de tráfico, donde la proporción de personas de minorías que residen en esa área supera la proporción promedio de personas de minorías en el área de servicio del beneficiario. Tras un análisis más detallado, se ha llegado a la conclusión de que un 41.8% de la población PTBA de BFT se considera parte de una población minoritaria (Tabla 6).

Tabla 6 – Porcentajes de población por raza/etnia para los condados de Benton y Franklin

| Raza / Etnicidad | Condado de Benton | Condado de Franklin | Combinación de los dos condados |
|---|-------------------|---------------------|---------------------------------|
| Afroamericano / Negro | 1.4% | 1.6% | 1.5% |
| Indígenas americanos y nativos de Alaska | 0.6% | 0.4% | 0.6% |
| Personas asiáticas | 3.0% | 2.1% | 2.7% |
| Nativos de Hawai y otras islas del Pacífico | 0.1% | 0.1% | 0.1% |
| Personas que declaran dos o más razas | 5.3% | 3.2% | 4.6% |
| Personas de origen hispano o latino | 22.5% | 52.6% | 32.6% |
| Caucásico/Blanco (no hispano) | 67.1% | 40.0% | 57.9% |
| Población minoritaria | 32.9% | 60.0% | 41.8% |

Fuente: Oficina del Censo de Estados Unidos, resultados del censo de 2020

Estado económico

La situación económica se analiza identificando a las poblaciones de bajos ingresos que viven dentro o en las proximidades del área de servicio de BFT. Por persona de bajos ingresos se entiende una persona cuya renta familiar media es igual o inferior a las directrices de pobreza del Departamento de Salud y Servicios Humanos de los Estados Unidos. Se anima a los beneficiarios a utilizar un umbral desarrollado localmente, como la definición que se encuentra en el 49 U.S.C. 5302. A efectos de este análisis demográfico, las personas con bajos ingresos se refieren a un individuo cuyos ingresos familiares están en el umbral de pobreza o por debajo de él. Las poblaciones de bajos ingresos se clasifican como un grupo fácilmente identificable de personas minoritarias que viven en proximidad geográfica.

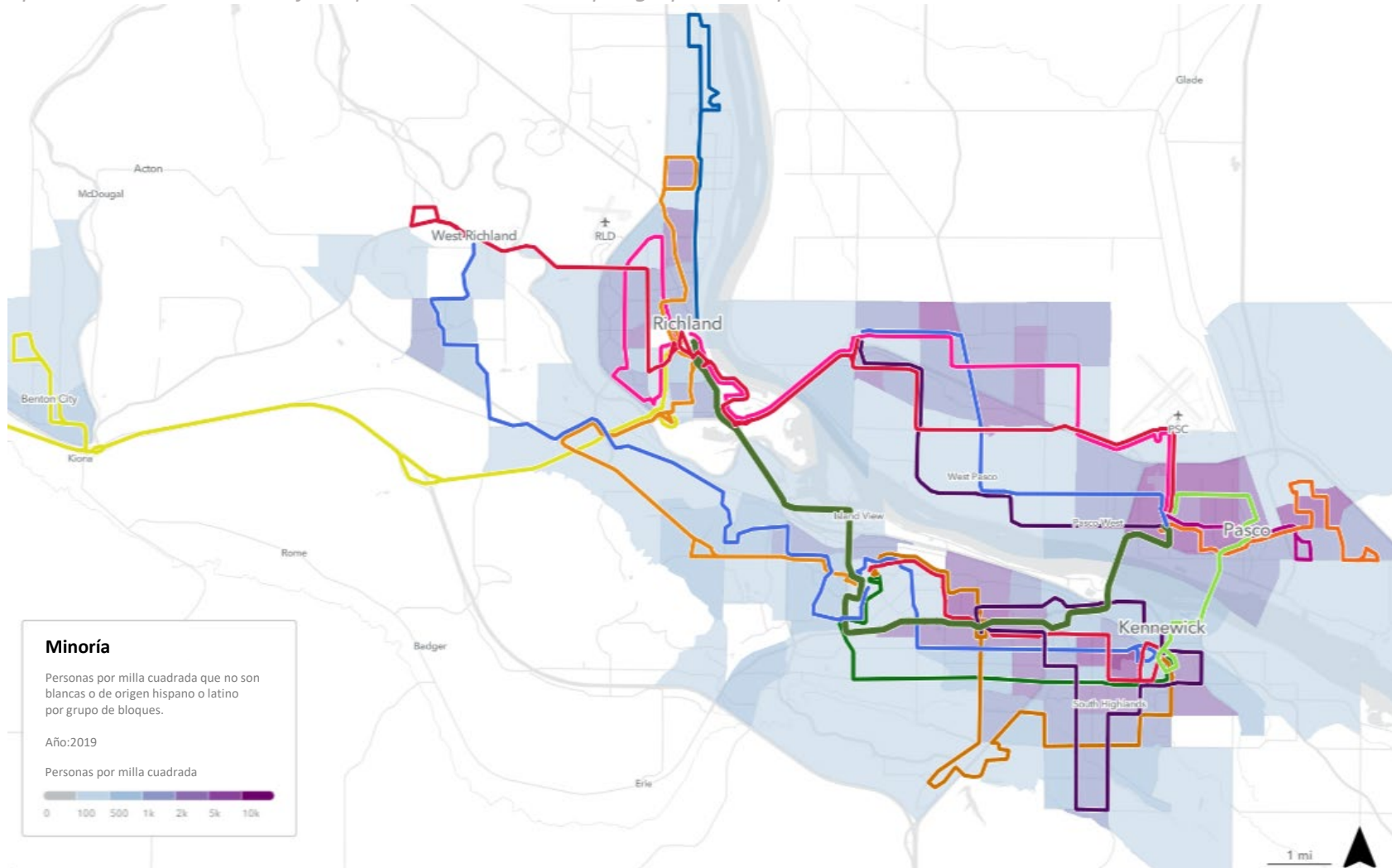
Aunque las poblaciones de bajos ingresos no son una clase protegida por el Título VI, están protegidas por la Orden Ejecutiva 12898, "Acciones federales para abordar la justicia ambiental en poblaciones minoritarias y de bajos ingresos". BFT se compromete a conocer las necesidades de los usuarios de tránsito con bajos ingresos para poder ajustar y mejorar los servicios para estas poblaciones. Se considera que el 14.3% del PTBA de BFT se encuentra en el umbral de pobreza federal o por debajo de ese umbral (Tablas 7).

Tabla 7 – Porcentajes de población por ingresos para los condados de Benton y Franklin

| Población Porcentaje por ingresos (censo de Estados Unidos) | Condado de Benton | Condado de Franklin | Total |
|--|--------------------------|----------------------------|--------------|
| Total de hogares | 73,073 | 28,263 | 101,336 |
| Menos de \$10,000 | 3.9% | 4.1% | 4.0% |
| \$10,000 a \$14,999 | 3.3% | 3.2% | 3.3% |
| \$15,000 a \$24,999 | 6.7% | 7.4% | 7.1% |
| Total de bajos ingresos | 13.9% | 14.7 | 14.3% |
| \$25,000 a \$34,999 | 7.4% | 9.0% | 8.2% |
| \$35,000 a \$49,999 | 11.6% | 11.6% | 11.6% |
| \$50,000 a \$74,999 | 18.9% | 20.8% | 19.7% |
| \$75,000 a \$99,999 | 14.3% | 12.8% | 13.5% |
| \$100,000 a \$149,999 | 17.9% | 18.6% | 18.2% |
| \$150,000 a \$199,999 | 8.4% | 6.8% | 7.6% |
| \$200,000 o más | 7.6% | 5.7% | 6.6% |
| Mediana de los ingresos familiares (dólares) | \$72,046 | \$66,984 | |
| Ingreso familiar medio (dólares) | \$92,280 | \$84,906 | |

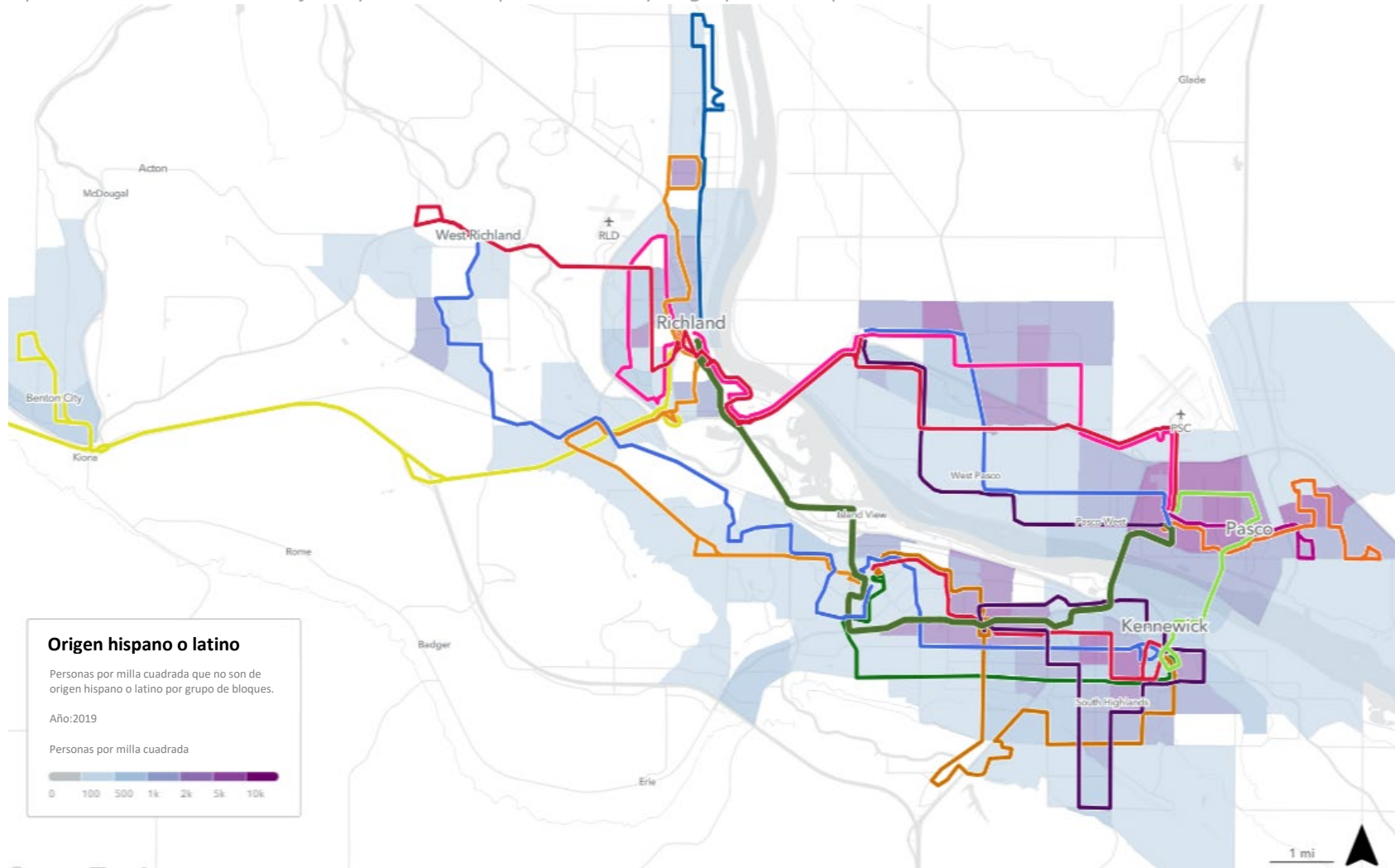
Fuente: Oficina del Censo de Estados Unidos, S1901 - Ingresos en los últimos 12 meses

Mapa 1 – BFT PTBA Porcentaje de población minoritaria por grupo de bloques



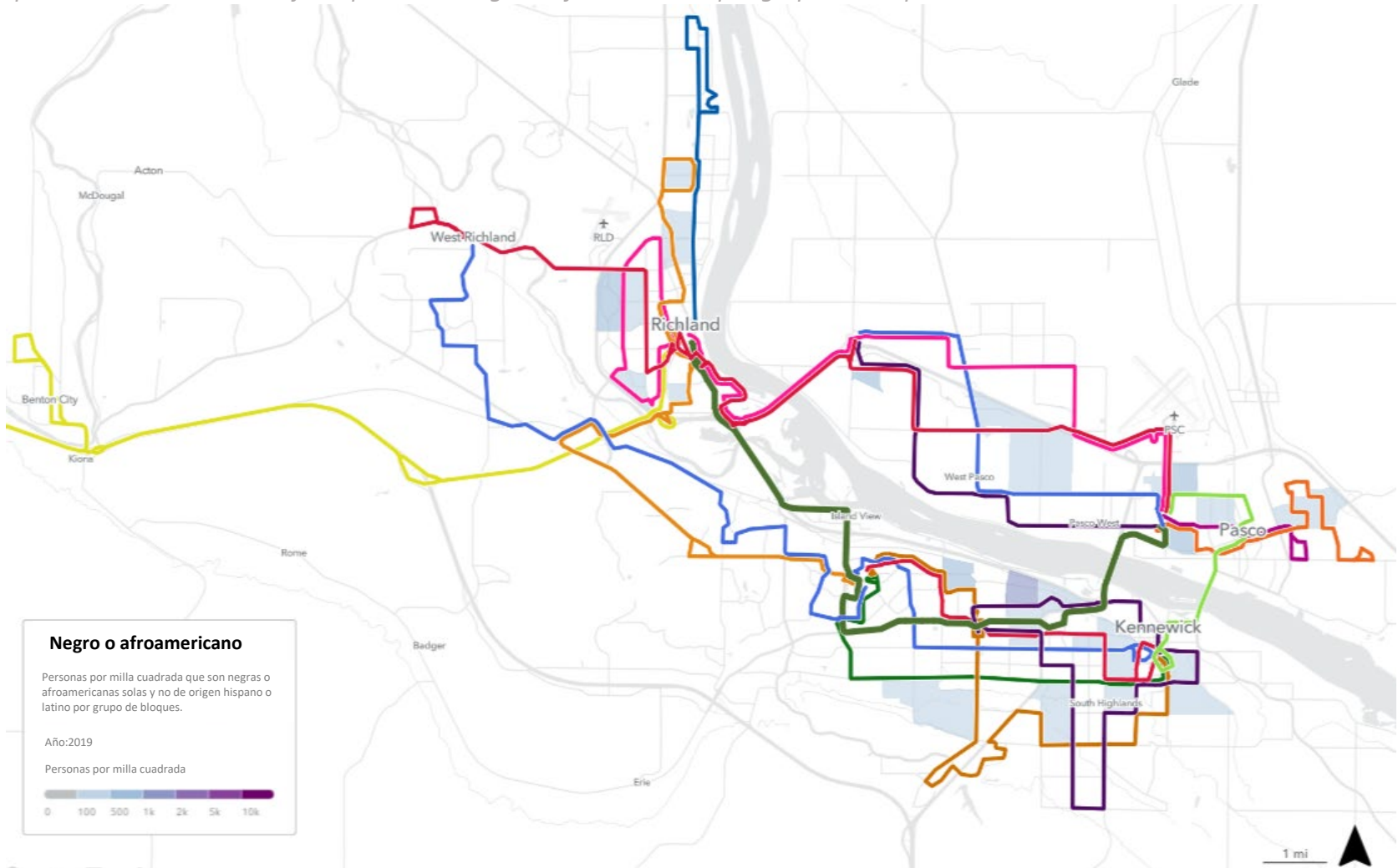
Fuente: Oficina del Censo de Estados Unidos, 2014-2019 Estimaciones de 5 años de la Encuesta sobre la Comunidad Americana

Mapa 2 – BFT PTBA Porcentaje de población hispana o latina por grupo de bloques



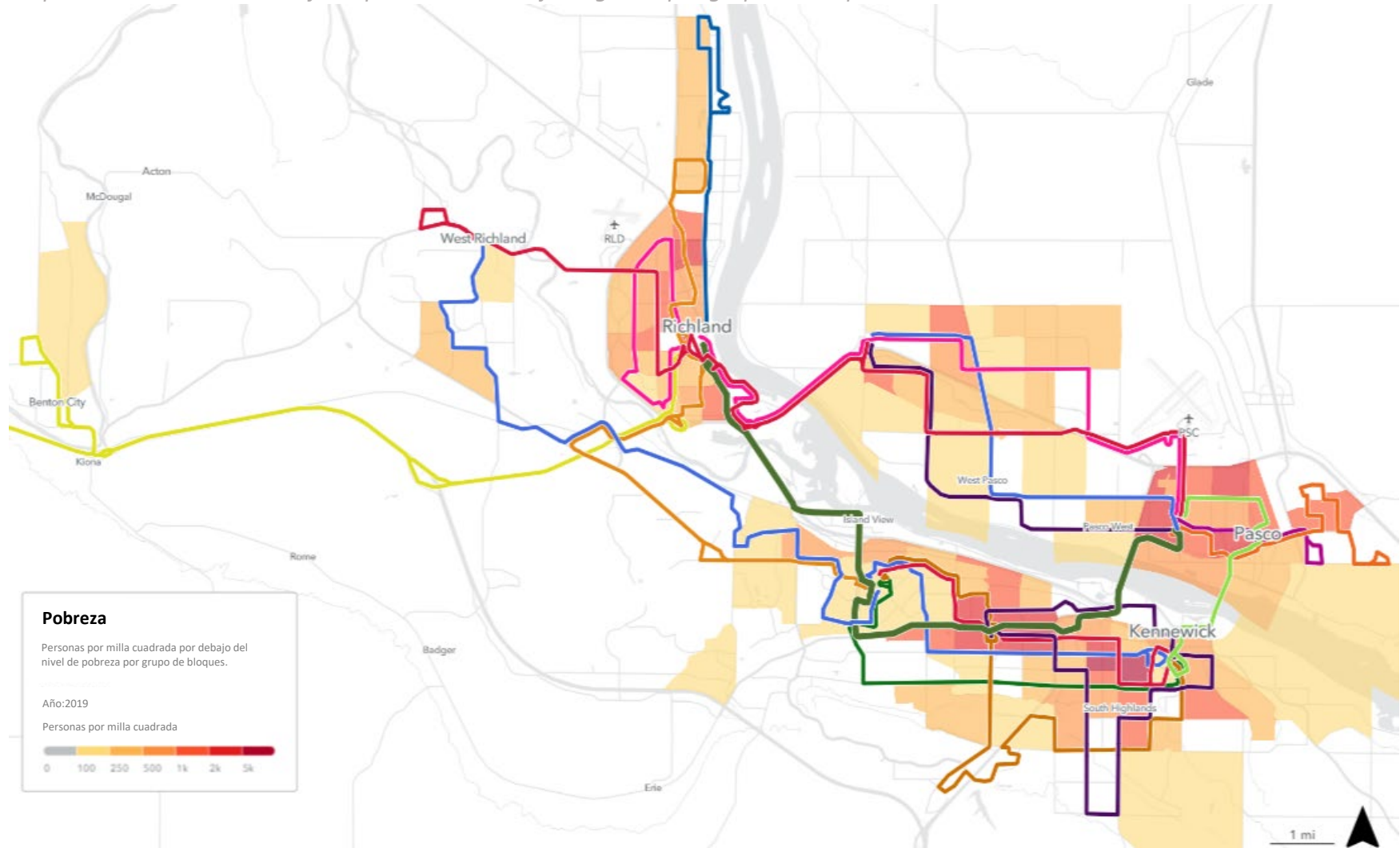
Fuente: Oficina del Censo de Estados Unidos, 2014-2019 Estimaciones de 5 años de la Encuesta sobre la Comunidad Americana

Mapa 3 – BFT PTBA Porcentaje de población negra o afroamericana por grupo de bloques



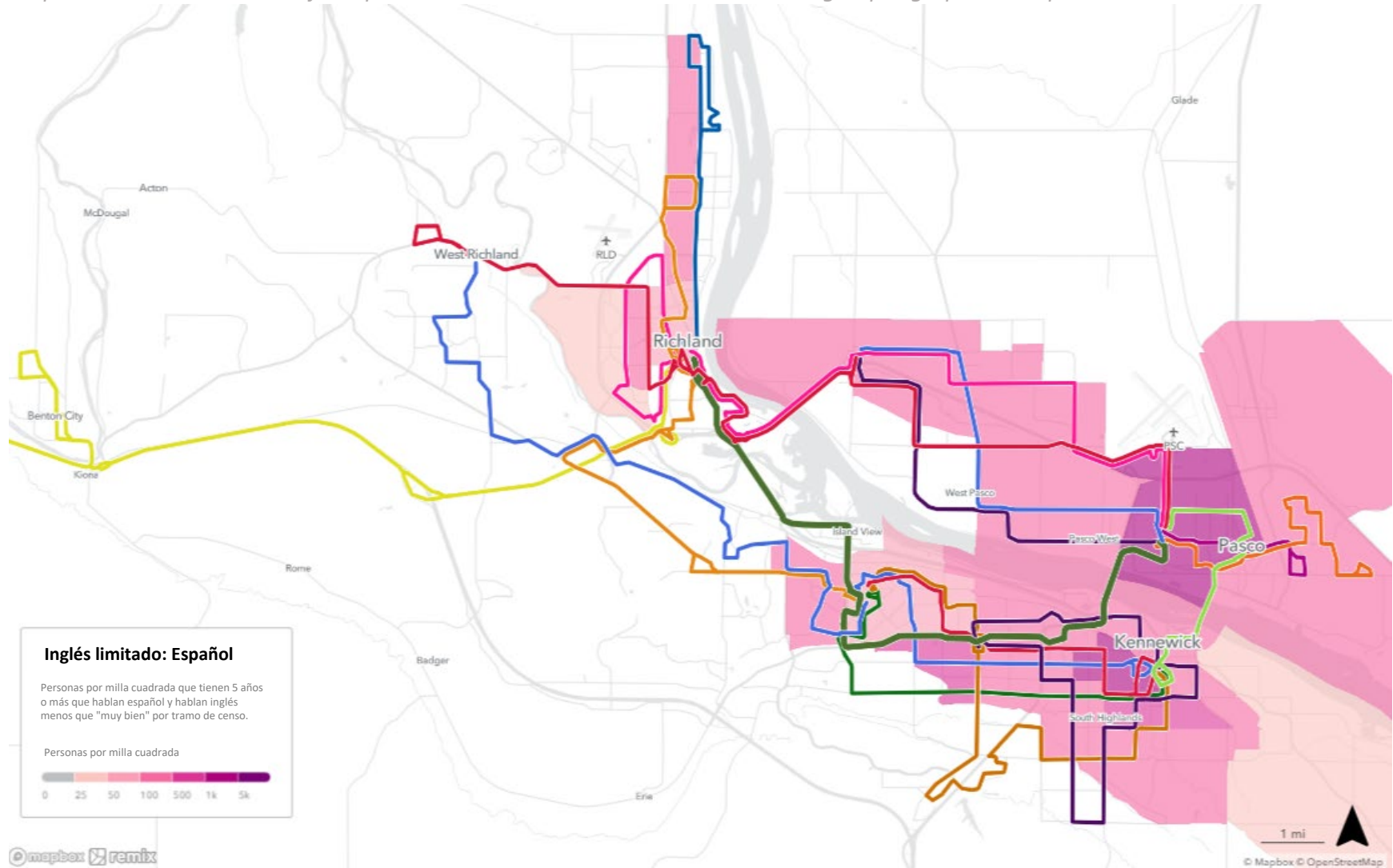
Fuente: Oficina del Censo de Estados Unidos, 2014-2019 Estimaciones de 5 años de la Encuesta sobre la Comunidad Americana

Mapa 4 – BFT PTBA Porcentaje de población con bajos ingresos por grupo de bloques



Fuente: Oficina del Censo de Estados Unidos, 2014-2019 Estimaciones de 5 años de la Encuesta sobre la Comunidad Americana

Mapa 5 – BFT PTBA Porcentaje de población con conocimientos limitados de inglés por grupo de bloques



BFT PTBA Porcentaje de población con bajos ingresos por grupo de bloques

Demografía de las tarifas y patrones de viaje

En abril de 2022, BFT llevó a cabo una encuesta exhaustiva a bordo con la intención de comprender mejor el origen demográfico, la situación económica y los patrones generales de viaje de los pasajeros. La encuesta se llevó a cabo durante un período de dos semanas, del 10 al 23 de abril, en los centros de tránsito, puntos de transferencia y a bordo de los autobuses de ruta fija. La encuesta también estuvo disponible durante todo el mes de abril por vía electrónica a través de la página web de BFT y de un código QR escaneable que dirigía a los pasajeros a la encuesta en sus smartphones.

Las encuestas estaban disponibles tanto en inglés como en español para encuestar eficazmente a las poblaciones LEP. La recogida de encuestas comenzó a las 6:30 a.m. y, dependiendo del día, finalizó entre las 5 p.m. y las 9 p.m. Se recogieron más de 1.900 encuestas durante todo el periodo de la encuesta.

La encuesta a bordo de BFT de 2022 concluyó que, de media, el 54% de los pasajeros encuestados se autoidentificó como minorías (Tabla 8). El 44.1% de los pasajeros encuestados declararon tener unos ingresos anuales inferiores a \$15,000, lo que indica que una gran parte de los pasajeros de BFT están cerca o por debajo del umbral de la pobreza (Tabla 9).

Tabla 8 – Resultados de la encuesta a los pasajeros de 2022 sobre la raza y el origen étnico

| Raza / Origen étnico | % Resultado de los pasajeros | % Población en general |
|---|------------------------------|------------------------|
| Afroamericano / Negro | 5.3% | 1.5% |
| Indígenas americanos y nativos de Alaska | 1.9% | 0.6% |
| Personas asiáticas | 2.8% | 2.7% |
| Árabe o del Medio Oriente | 0.5% | |
| Nativos de Hawai y otras islas del Pacífico | 0.8% | 0.1% |
| Otros | 2.9% | 4.6% |
| Personas de origen hispano o latino | 39.7% | 32.6% |
| Caucásico / Blanco (no hispano) | 46.0% | 57.9% |
| % de la Minoría | 54.0% | 41.8% |

Fuente: Oficina del Censo de Estados Unidos, 2020 y Encuesta a los pasajeros a bordo de BFT

Table 9 – Resultados de la encuesta de ingresos de los pasajeros de 2022

| Ingresos | % Resultado de los pasajeros |
|----------------------|------------------------------|
| Menos de \$15,000 | 44.1% |
| \$15,000 - \$25,000 | 21.7% |
| \$26,000 - \$40,000 | 13.8% |
| \$41,000 - \$60,000 | 8.0% |
| \$61,000 - \$80,000 | 4.8% |
| \$81,000 - \$100,000 | 2.3% |
| \$100,000 y más | 5.2% |

Fuente: Encuesta a los pasajeros a bordo de BFT

Uso de la tarifa, propósito del viaje y patrones de viaje Los pasajeros de minorías y de bajos ingresos informaron que usaban un pase el 35% y el 55% de las veces, respectivamente (Figura 4). Los pasajeros de minorías y de bajos ingresos informaron de que utilizaban dinero en efectivo en un porcentaje mayor que las minorías o la población total. Se observó que las poblaciones de bajos ingresos eran las más propensas a pagar una tarifa reducida en efectivo. En general, el dinero en efectivo fue el método de pago más utilizado por los grupos minoritarios y de bajos ingresos. Los pases para jóvenes y los pases del Columbia Basin College también fueron utilizados por un mayor porcentaje de pasajeros de minoría.

Figura 4 – Método de pago de la tarifa por grupo de pasajeros

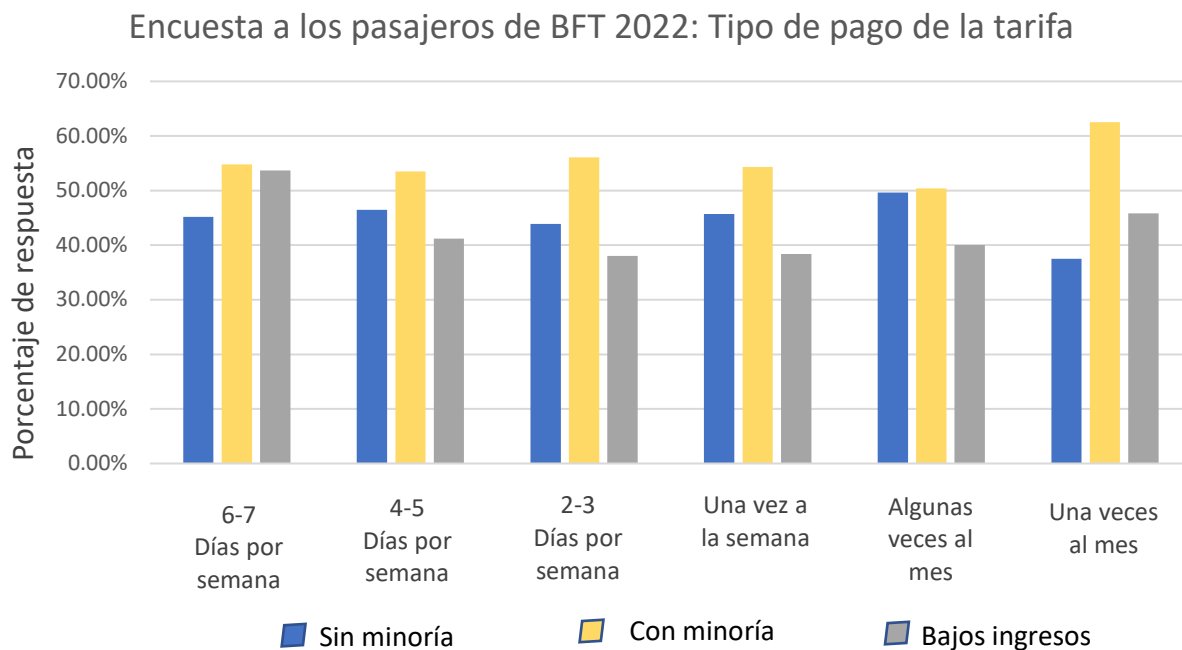


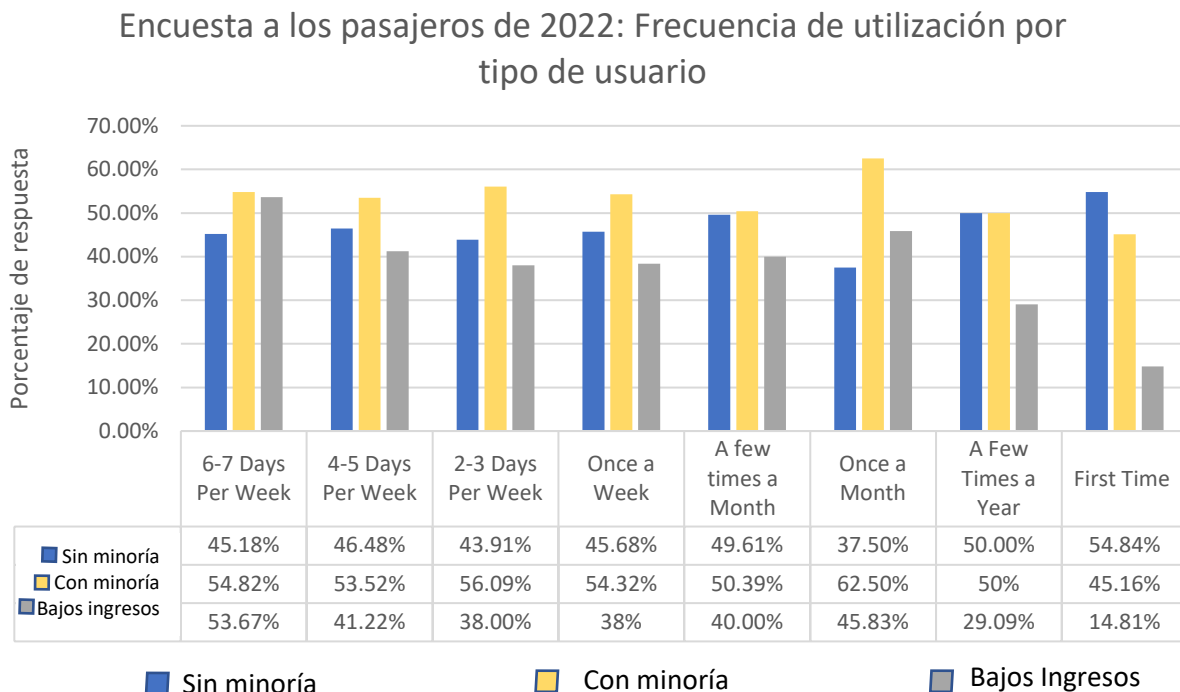
Tabla 10 – Tipo de pago de la tarifa

| Tipo de pago | Sin minoría | Con minoría | Bajos ingresos |
|--------------------------------|-------------|-------------|----------------|
| Pagado en efectivo | 34.75% | 65.25% | 45.55% |
| Pase para personas mayores | 58.91% | 41.09% | 32.38% |
| Pase para jóvenes | 40.00% | 60.00% | 36.67% |
| Pase de Columbia Basin College | 38.75% | 61.25% | 29.0% |
| Pase de Libertad “Freedom” | 38.81% | 61.19% | 39.29% |
| Tarifa reducida | 66.41% | 33.59% | 59.48% |

Fuente: Encuesta a los pasajeros de BFT en 2022

El 35.6% de todos los pasajeros encuestados declararon que utilizan el autobús seis (6) o más veces a la semana (Figura 5). Las poblaciones de bajos ingresos son las más propensas a utilizar el autobús seis (6) días a la semana). Las minorías y los pasajeros de bajos ingresos eran mucho más propensos a utilizar el autobús diariamente en comparación con la población general. Los pasajeros informaron de que el 81.2% había transferido al menos una vez a otro autobús BFT para llegar a su destino final. El 70.4% de los pasajeros reportó no tener acceso regular a un automóvil, el 43.9% gana menos de \$15,000 al año, y el 26.1% habla un segundo idioma diferente al inglés en casa.

Figura 5 – Frecuencia de uso por tipo de pasajero



Fuente: Encuesta a los pasajeros de BFT de 2022

2.4 TÍTULO VI SERVICIO PRINCIPAL Y POLÍTICAS DE CAMBIO DE TARIFAS

Resumen

De acuerdo con lo estipulado en la Circular 4702.1B §4, Cap. 4-10 de la FTA, BFT preparará un análisis de equidad del Título VI/Justicia Ambiental, cuando sea aplicable, de todos los cambios importantes de servicio y de tarifas utilizando la orientación actual de la FTA. Esta documentación se presentará a la FTA y se archivará en BFT. El análisis evaluará los cambios propuestos y sus impactos en las poblaciones minoritarias y de bajos ingresos dentro del área de servicio de BFT, incluyendo la discusión de las estrategias de alcance y participación pública y las actividades utilizadas para involucrar e informar a las poblaciones minoritarias, de bajos ingresos y de competencia limitada en inglés a lo largo del proceso de toma de decisiones.

El análisis de equidad de los cambios de servicio y de las tarifas se llevará a cabo cuando dichos cambios superen el umbral cuantitativo indicado en la *Política de Cambios Importantes de Servicio, Carga Desproporcionada e Impacto Discriminatorio de BFT*, adoptada por el Consejo de Administración de BFT mediante la Resolución 15-2013 (**Apéndice C**). Se introdujeron cambios adicionales en la *política de carga desproporcionada e impacto discriminatorio* mediante la adopción por parte del Consejo de Administración de BFT de la Resolución 26-2014 (**Apéndice D**). BFT tiene la intención de optimizar la política de cambios importantes en el servicio mediante la Resolución XX-2022 cuando se apruebe esta actualización del programa en julio de 2022.

Cambios importantes en los servicios, carga desproporcionada, y políticas de impacto discriminatorio

El requisito de esta política proviene de la Circular 4702.1B de la FTA, "Requisitos y directrices del Título VI para los beneficiarios de la Administración Federal de Tránsito", que entró en vigor el 1 de octubre de 2012. La Circular requiere que cualquier receptor de la FTA que opere 50 o más vehículos de ruta fija en servicio pico y sirva a una población de 200,000 o más. La política requiere que BFT evalúe cualquier cambio de tarifa y cualquier cambio de servicio importante en las etapas de planificación y programación para determinar si esos cambios tienen un impacto discriminatorio o desproporcionado. A partir de 2021, BFT operaba 49 vehículos de ruta fija en servicio máximo anual en un área de servicio que supera los 200,000 habitantes

Política de cambios importantes en los servicios de BFT Un cambio de servicio importante se define como cualquier cambio en el servicio de cualquier ruta individual que añada o elimine más del 20% de las millas de ingresos de la ruta y/o el veinte por ciento de las horas de ingresos de la ruta. Adicionalmente, se realizará un análisis de equidad cuando las horas de ingresos de todo el sistema asignadas a las áreas minoritarias sean inferiores a la parte de la media del área de servicio.

Todos los cambios de servicio importantes estarán sujetos a un análisis de equidad que incluye un análisis de los efectos adversos. Un efecto adverso se define como una reducción geográfica o de tiempo en el servicio que incluye, pero no se limita, a la extensión de los cambios de servicio, los cambios de frecuencia, la eliminación de segmentos de ruta, el desvío de rutas o la eliminación de rutas.

Política de cargas desproporcionadas de BFT El objetivo de esta política es establecer un umbral que identifique cuándo los efectos adversos de un cambio de servicio importante o de cualquier cambio de tarifa afectan de forma desproporcionada a las poblaciones con bajos ingresos.

Si el impacto de una propuesta de cambio de servicio importante o de cualquier propuesta de cambio de tarifa requiere que una población de bajos ingresos reciba un 20% menos de beneficios o soporte efectos adversos un 20% más que esos beneficios o efectos adversos recibidos o soportados por la población sin minoría, ese impacto se considerará una carga desproporcionada.

La carga desproporcionada en las rutas con cambios en el tiempo de servicio y/o en la frecuencia se determinará analizando todas las rutas con dichos cambios en conjunto. La carga desproporcionada en las rutas con eliminación de segmentos, desvíos o eliminación de rutas se determinará ruta por ruta.

Política de impacto desigual de BFT El objetivo de esta política es establecer un umbral que identifique cuándo los efectos adversos de un cambio de servicio importante o de cualquier cambio de tarifa afectan de forma desproporcionada a los miembros de un grupo identificado por su raza, color u origen nacional.

Si el impacto de una propuesta de cambio de servicio importante o de cualquier propuesta de cambio de tarifa requiere que una población minoritaria reciba un 20% menos de beneficios o soporte efectos adversos un 20% más que esos beneficios o efectos adversos recibidos o soportados por la población sin minoría, ese impacto se considerará un impacto dispar.

Si BFT detecta un posible impacto dispar o una carga desproporcionada, la agencia tomará medidas para evitar, minimizar o mitigar los impactos y, a continuación, volverá a analizar el plan de servicios modificado para determinar si se han eliminado los impactos. Si el BFT decide no alterar los cambios propuestos, la agencia puede implementar el servicio o el cambio de tarifa si existe una justificación sustancial legítima para el cambio y la agencia puede demostrar que no hay alternativas que tengan un menor impacto en la población minoritaria y que sigan cumpliendo los objetivos legítimos del programa de la agencia.

3. REVISIÓN DE LA SUPERVISIÓN DEL SERVICIO 2021-2022

Cada tres años BFT prepara una revisión de su cumplimiento con los requisitos del Título VI para aplicar y supervisar las normas y políticas de servicio en todo el sistema para asegurar que los servicios de tránsito equitativos están disponibles para las minorías y las poblaciones de bajos ingresos como se indica en la Circular 4702.1B de la FTA. Esta sección detallará el análisis del sistema de rutas fijas de BFT y determinará si las normas y políticas de servicio adoptadas para todo el sistema se han respetado y cumplido plenamente.

Para llevar a cabo una revisión exhaustiva de las normas y políticas de servicio de todo el sistema, BFT debe seleccionar una muestra de rutas de minorías y sin minorías que presten servicio a zonas predominantemente respectivas. Esta muestra incluye todas las rutas de la red de rutas fijas de BFT, aparte de los servicios de demostración y las rutas de sobrecarga/viaje. Se compararon las rutas de minorías y sin minorías para garantizar que no existen disparidades en la aplicación y el cumplimiento de las normas y políticas de servicio adoptadas por BFT en todo el sistema.

Según la FTA, una ruta de tránsito de minorías "tiene al menos 1/3 de su kilometraje total de ingresos en un bloque de censo o grupo de bloques, o zona(s) de análisis de tráfico con un porcentaje de la población de minorías que supera el porcentaje de población de minorías en el área de servicio de tránsito". BFT considera que una ruta de minorías es cualquier ruta en la que el porcentaje de población minoritaria está dentro de ¼ de milla y supera el porcentaje medio de población minoritaria en el área de servicio general. La mayoría de las rutas de BFT (12 de 19 rutas) cumplen esta definición de ruta para minorías.

Se tomaron las siguientes medidas para garantizar que la supervisión del servicio se realizara de acuerdo con la Circular 4702.1B de la FTA:

- Identificar y designar rutas individuales como minoritarias o sin minorías.
- Establecer los promedios de todo el sistema para el servicio, los vehículos y la distribución de los servicios.
- Inventario de servicios y amenidades por ruta (tanto de minorías como de sin minorías).
- Evaluar las rutas individuales para valorar cualquier impacto desproporcionado de cualquier ruta para cualquier categoría de criterios evaluados.
- Documentar cualquier acción correctiva basada en el análisis.

3.1 REVISIÓN DEL SEGUIMIENTO DE LAS NORMAS DE SERVICIO

BFT debe supervisar cada tres años la aplicación y el cumplimiento de las políticas de servicio adoptadas en todo el sistema. Los datos, tablas, figuras y mapas proporcionados en esta sección ejemplifican cómo BFT evalúa las normas de servicio en lo que respecta a los grupos identificados por raza, color u origen nacional. Los datos utilizados en esta revisión de supervisión de servicios se recopilaron durante el período comprendido entre el 1 de octubre y el 31 de diciembre de 2021.

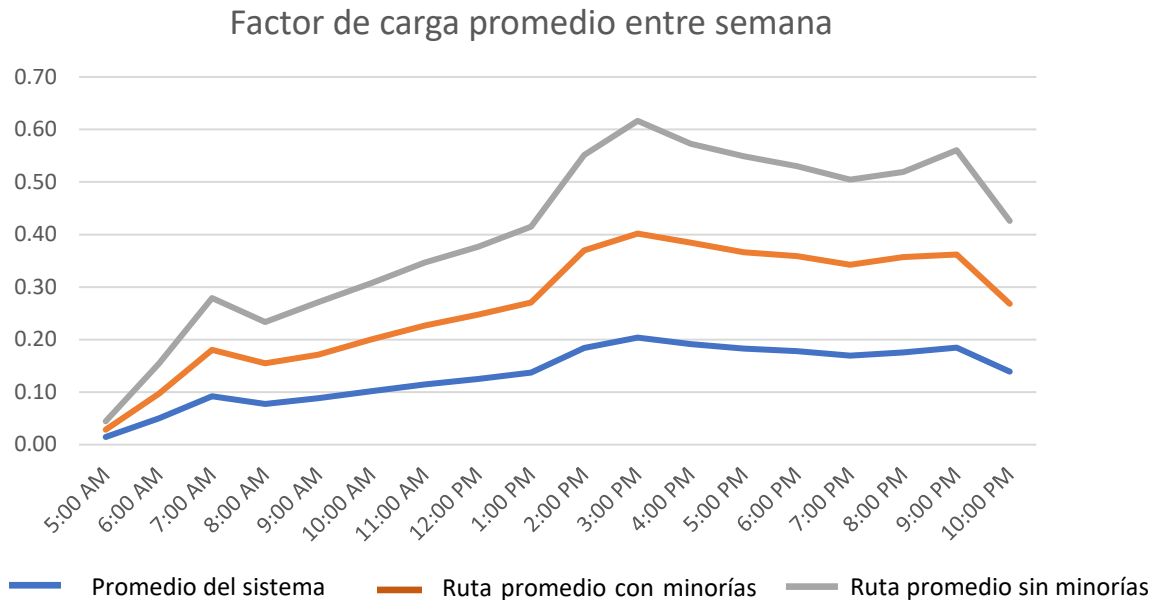
Carga del vehículo

Norma de servicio de ruta fija BFT ha adoptado un estándar de carga de 1.25 para su servicio de rutas fijas durante el período de funcionamiento máximo y no debe exceder las capacidades alcanzables de los vehículos. Un factor de carga de 1.25 indica que todos los asientos están ocupados y que no hay más de un 25% de pasajeros de pie. Si se observa que un viaje/ruta está alcanzando o superando constantemente un estándar de carga de 1.25, se tomarán medidas para añadir frecuencia o un servicio de sobrecarga para minimizar la sobrecarga.

Análisis La carga media de los viajes en días laborables que se producen durante el período del 1 de octubre al 31 de diciembre de 2022, concluyó que ninguna ruta supera sistemáticamente un factor de carga de 1.25 en ningún momento durante un día de servicio determinado. Las rutas minoritarias y sin minorías están más ocupadas durante el pico de la tarde (2 p.m. a 5 p.m.), con un factor de carga promedio de 0.20 y 0.21 respectivamente durante este lapso (Figura 6) Se observó que los viajes del sábado tienen una carga promedio más baja, con rutas minoritarias y sin minorías experimentando un factor de carga promedio en el pico de la tarde de 0.14 y 0.13 respectivamente (Tabla 13). Todas las rutas operaron sin exceder un factor de carga de 1.25 de forma consistente y se concluyó que no existe ninguna disparidad aparente o intencionada entre las rutas de minorías y sin minorías en términos de la norma de factor de carga de BFT.

El factor de carga continuará siendo monitoreado para determinar si se necesitan más recursos de ruta fija en ciertas rutas a ciertas horas del día.

Figura 6 – Carga promedio entre semana en rutas para minorías y sin minorías por hora del día



3.2 DISTANCIA DEL VEHÍCULO

Declaración estándar del servicio de ruta fija

Las frecuencias de las rutas de BFT se ajustan en función de la demanda de viajeros y del potencial del mercado, utilizando factores de carga, productividad y crecimiento del desarrollo para informar el proceso de planificación. Las frecuencias actuales de los vehículos oscilan entre 15 y 60 minutos, aparte de la Ruta 170, que circula cada 120 minutos. Algunas partes de los corredores comerciales de alto tráfico, como Court St (Pasco) y Clearwater (Kennewick), experimentan una frecuencia de 15 minutos durante todo el día con las Rutas 1 y 3 de BFT, que se implementaron en junio de 2021.

Análisis La frecuencia de los vehículos por ruta determinaron que no existe una disparidad aparente o intencionada entre la frecuencia media de las rutas de minorías y sin minorías. Los días entre semana, las rutas de minorías y sin minorías tienen una frecuencia promedio de 35 y 47 minutos, respectivamente (Tabla 14). Los sábados, las rutas de minorías y sin minorías tienen una frecuencia media de 35 y 49 minutos, respectivamente (Tabla 15). El servicio para minorías termina una media de 19 minutos más tarde en días de semana. Los horarios utilizados para determinar las frecuencias medias son de octubre de 2018.

Tabla 11 – Frecuencia en días de la semana por ruta

| Ruta entre semana | | | | | | | |
|-------------------|----------------------|---------------------|------------------------|---------------------|-------|-----------------|---------------------------|
| Número de ruta | Comienza el servicio | Frecuencia en la AM | Frecuencia de mediodía | Frecuencia en la PM | Tarde | Fin de servicio | Horas de operación aprox. |
| 1 | 6:00 AM | 15 | 15 | 15 | 15 | 10:00 PM | 16 |
| 3 | 6:00 AM | 15 | 15 | 15 | 15 | 10:00 PM | 16 |
| 20 | 6:15 AM | 30 | 30 | 30 | 30 | 10:00 PM | 15.75 |
| | | | | | | | |
| 25 | 5:45 AM | 30 | 30 | 30 | 30 | 8:00 PM | 14.3 |
| 26 | 6:00 AM | 30 | 30 | 30 | 30 | 9:30 PM | 15.5 |
| 40 | 6:15 AM | 30 | 30 | 30 | 30 | 8:00 PM | 13.8 |
| 41 | 6:00 AM | 60 | 60 | 60 | 60 | 8:00 PM | 14.0 |
| 42 | 6:00 AM | 30 | 30 | 30 | 30 | 9:30 PM | 15.5 |
| 47 | 6:00 AM | 30 | 30 | 30 | 30 | 9:30 PM | 15.5 |
| 48 | 6:00 AM | 30 | 30 | 30 | 30 | 9:30 PM | 15.5 |
| 64 | 6:00 AM | 30 | 30 | 30 | 30 | 8:00 PM | 14.0 |
| 65 | 6:00 AM | 30 | 30 | 30 | 30 | 9:30 PM | 15.5 |
| 66 | 6:30 AM | 60 | 60 | 60 | 60 | 9:30 PM | 15.0 |
| 67 | 6:00 AM | 60 | 60 | 60 | 60 | 10:00 PM | 14.0 |
| 110 | 5:45 AM | 60 | 60 | 60 | 60 | 7:30 PM | 14.3 |
| | | | | | | | |
| 123 | 6:00 AM | 30 | 30 | 30 | 30 | 10:00 PM | 16.0 |
| 170 | 5:30 AM | 120 | 120 | 120 | 120 | 8:30 PM | 15.0 |
| | | | | | | | |
| 225 | 6:00 AM | 30 | 30 | 30 | 30 | 10:00 PM | 16.0 |
| 268 | 5:45 AM | 30 | 30 | 30 | 30 | 8:00 PM | 14.3 |

*Minoría

Tabla 12 – Frecuencia promedio de los vehículos por ruta

| | Frecuencia en la AM | Frecuencia de mediodía | Frecuencia en la PM | Tarde | Fin de servicio | Horas de operación aprox. |
|-------------------------------------|---------------------|------------------------|---------------------|-------|-----------------|---------------------------|
| Promedio del sistema | 44 | 44 | 44 | 44 | 9:06 PM | 15.1 |
| Promedio de la ruta de las minorías | 35 | 35 | 35 | 35 | 9:16 PM | 15.0 |
| Ruta Promedio sin minorías* | 47 | 47 | 47 | 47 | 9:00 PM | 15.2 |

Figura 7 – Frecuencia promedio entre semana por rutas de minorías y sin minorías

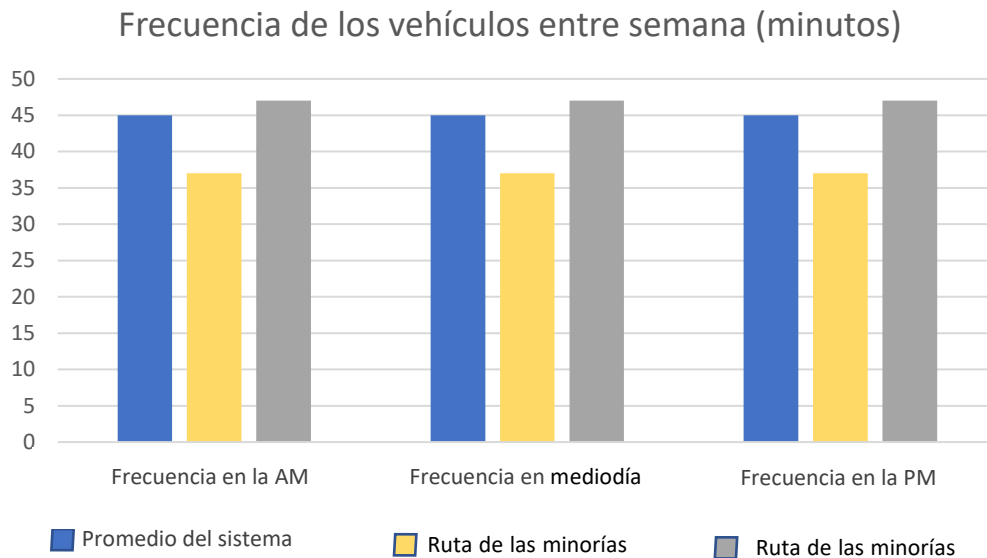


Tabla 13 – Frecuencia de vehículos por ruta en Sábado

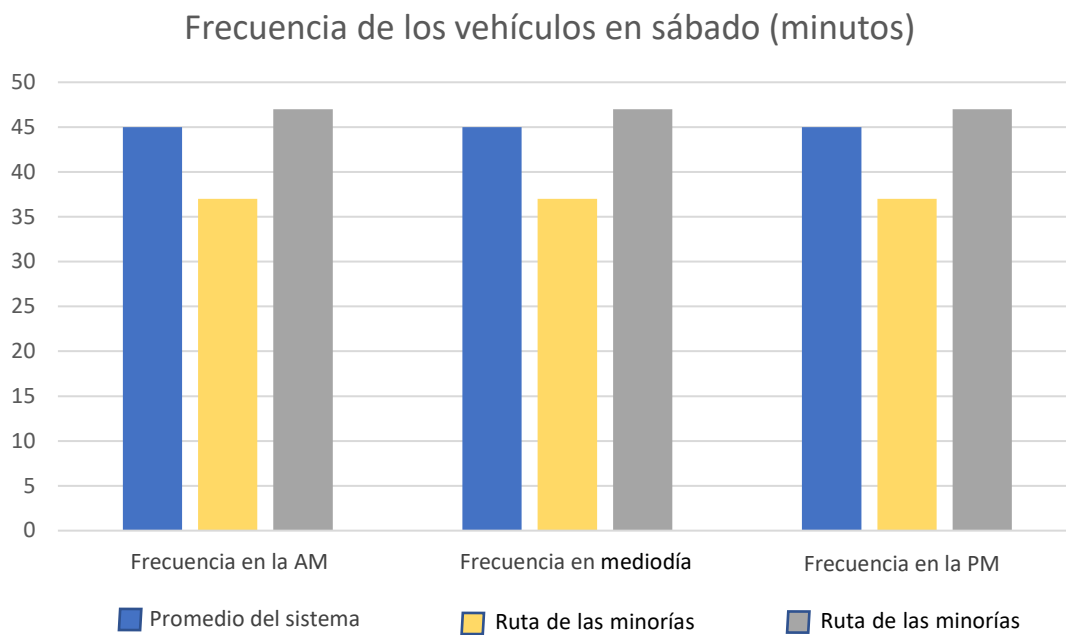
| Sábado por ruta | | | | | | | |
|-----------------|----------------------|---------------------|------------------------|---------------------|-------|-----------------|---------------------------|
| Número de ruta | Comienza el servicio | Frecuencia en la AM | Frecuencia de mediodía | Frecuencia en la PM | Tarde | Fin de servicio | Horas de operación aprox. |
| 1 | 7:00 AM | 15 | 15 | 15 | 15 | 10:00 PM | 15 |
| 3 | 7:00 AM | 15 | 15 | 15 | 15 | 10:00 PM | 15 |
| 20 | 7:15 AM | 30 | 30 | 30 | 30 | 10:00 PM | 14.75 |
| 25 | 6:45 AM | 30 | 30 | 30 | 30 | 7:00 PM | 14.0 |
| 26 | 7:00 AM | 30 | 30 | 30 | 30 | 9:30 PM | 14.5 |
| 40 | 7:15 AM | 30 | 30 | 30 | 30 | 8:00 PM | 12.8 |
| 41 | 7:00 AM | 60 | 60 | 60 | 60 | 8:00 PM | 13.0 |
| 42 | 7:00 AM | 30 | 30 | 30 | 30 | 9:30 PM | 14.5 |
| 47 | 7:00 AM | 30 | 30 | 30 | 30 | 9:30 PM | 14.5 |
| 48 | 7:00 AM | 30 | 30 | 30 | 30 | 9:30 PM | 14.5 |
| 64 | 7:00 AM | 30 | 30 | 30 | 30 | 8:00 PM | 13.0 |
| 65 | 7:00 AM | 30 | 30 | 30 | 30 | 9:30 PM | 14.5 |
| 66 | 6:30 AM | 60 | 60 | 60 | 60 | 9:30 PM | 15.0 |
| 67 | 6:00 AM | 60 | 60 | 60 | 60 | 10:00 PM | 14.0 |
| 110 | 5:45 AM | 60 | 60 | 60 | 60 | 7:30 PM | 14.3 |
| 123 | 6:00 AM | 30 | 30 | 30 | 30 | 10:00 PM | 16.0 |
| 170 | 5:30 AM | 120 | 120 | 120 | 120 | 8:30 PM | 15.0 |
| 225 | 6:00 AM | 30 | 30 | 30 | 30 | 10:00 PM | 16.0 |
| 268 | 5:45 AM | 30 | 30 | 30 | 30 | 8:00 PM | 14.3 |

*Minoría

Tabla 14 – Sábado Frecuencia promedio de los vehículos

| Rutas | Frecuencia en la AM | Frecuencia de mediodía | Frecuencia en la PM | Tarde | Fin de servicio | Horas de operación aprox. |
|-------------------------------|---------------------|------------------------|---------------------|-------|-----------------|---------------------------|
| Promedio del sistema | 45 | 45 | 45 | 47 | 9:03 PM | 14.4 |
| Ruta de las minorías promedio | 37 | 37 | 37 | 47 | 9:03 PM | 14.2 |
| Ruta sin minorías Promedio | 47 | 47 | 47 | 50 | 9:04 PM | 14.6 |

Figura 8 – Frecuencia promedio los sábados por rutas de minorías y sin minorías



Rendimiento puntual

Servicio de ruta fija normalizado La puntualidad varía según el modo. Actualmente, la ruta fija opera entre cero (0) y cinco (5) minutos antes de que un autobús de ruta fija se considere tarde.

Análisis Los datos de rendimiento de las rutas fijas del 1 de febrero al 31 de marzo de 2022, concluyeron que el 91.5% de todas las rutas muestreadas salieron de sus puntos de tiempo programados a tiempo, el 3.8% salieron temprano y el 4.7% salieron tarde. Las rutas minoritarias fueron puntuales el 91.5% de las veces, mientras que las rutas no minoritarias tuvieron una tasa de puntualidad ligeramente inferior, del 89.2% (Tabla 15). Sobre la base de esta información, se concluyó que no existe ninguna disparidad aparente o intencionada entre las rutas de minorías y las de no minorías en cuanto a la norma de puntualidad de BFT.

Aunque en general las rutas de minorías tuvieron un mejor desempeño que las rutas de no minorías, las Rutas 3, 65 y 268 (Todas las rutas de minorías) tuvieron tasas de desempeño a tiempo más bajas que el promedio de las rutas de minorías. Estas rutas, junto con las Rutas 20 (88.2%) y 26 (89.7%) han sido identificadas como de bajo rendimiento y serán analizadas más a fondo para determinar cómo se puede mejorar su rendimiento de ruta a tiempo.

Figura 9 – Rendimiento puntual por ruta

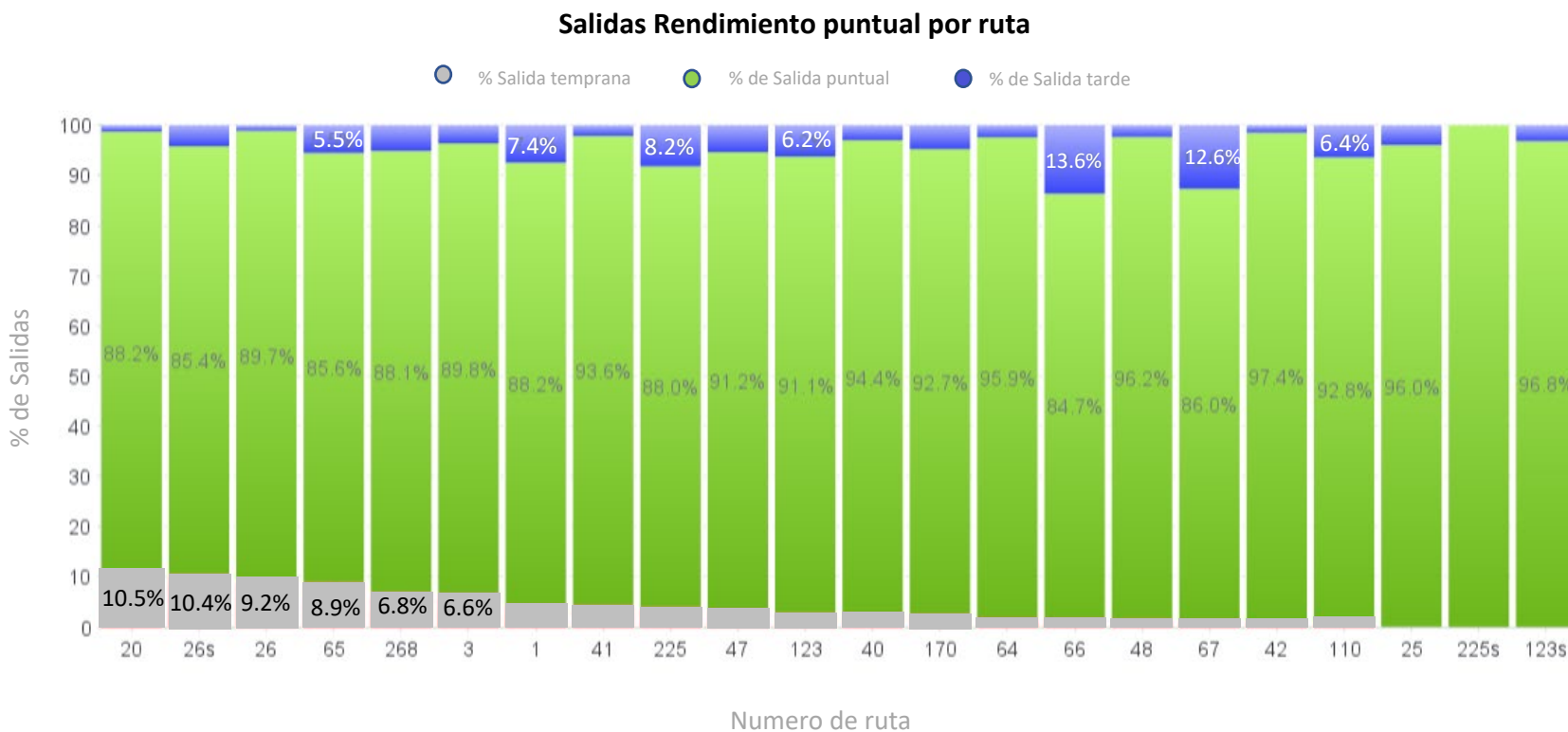


Tabla 15 – Rendimiento de la puntualidad por rutas de minorías y sin minorías

| Rutas | % A tiempo | % Temprano | % Tarde |
|-------------------------------|------------|------------|---------|
| Promedio del sistema | 91.5% | 3.8% | 4.7% |
| Ruta de las minorías promedio | 91.9% | 4.1% | 4.0% |
| Ruta sin minorías Promedio | 89.2% | 4.4% | 6.4% |

Disponibilidad del servicio

Declaración de la política del servicio de ruta fija BFT distribuye el servicio de tránsito basándose en la demanda observada, las tendencias de la población y el uso del terreno. El objetivo de BFT es garantizar que todos los residentes del PTBA tengan acceso a los servicios de tránsito, ya sea con un servicio programado de ruta fija o con el servicio CONNECT bajo demanda.

Tabla 16 – Población en ½ milla del servicio de ruta fija

| Nombre | Población total a 1/2 milla del tránsito 2022 | Población total | Porcentaje de la población total 2022 | % Población total a 1/2 milla de tránsito 2018 | Población minoritaria en un radio de 1/2 milla del Tránsito 2022 | % de población minoritaria a 1/2 millas de Transit 2022 |
|---|---|-----------------|---------------------------------------|--|--|---|
| Poblaciones 1/2 milla de la zona de tránsito | 208,305 | 275,388 | 75.60% | 72% | 79,553 | 79% |

* Fuente: Oficina de Gestión Financiera del Estado de Washington, SAEP

Análisis Utilizando los datos de población de la Oficina de Gestión Financiera del Estado de Washington para el año 2020, se concluyó que un estimado del 72% de la población total del PTBA de BFT se encuentra dentro de ½ milla de una ruta fija. Las poblaciones minoritarias experimentan una disponibilidad de servicio ligeramente mejor, ya que el 79% de la población minoritaria vive a menos de ½ milla de una ruta fija (Tabla 16). Sobre la base de esta información, se concluyó que no existe ninguna disparidad aparente o intencionada entre las rutas de las minorías y las de los no-minoritarios en términos de disponibilidad del servicio.

Distribución de los servicios de tránsito

Declaración de política de servicios Los servicios de tránsito, incluyendo las instalaciones, se ubican donde la demanda existente o proyectada apoya la inversión. Antes de 2020, los servicios elegidos se basaban en las normas de productividad descritas en la Política de servicios y directrices de las paradas de BFT. En la actualidad, las paradas reciben una etiqueta basada principalmente en el número medio de pasajeros en días laborables, que estipula los servicios mínimos recomendados que deben proporcionarse en las paradas de las rutas fijas en función del número de embarques diarios. Otras consideraciones son si la parada está situada en una ruta de metro (frecuente), si la parada tiene un tiempo de espera elevado (frecuencia), y si la ubicación tiene otras limitaciones que impedirían la capacidad de BFT para instalar los servicios asignados (por ejemplo, limitaciones de derechos de paso, desaprobación del propietario, desaprobación jurisdiccional).

Los servicios de tránsito se eligen en función de los grupos y de la frecuencia de uso de las siguientes maneras:

- Básico: menos de cinco (5) embarques de promedio entre semana.
- Mejorado: de cinco (5) a 15 embarques de promedio entre semana.
- Refugio del autobús: Más de 15 subidas de promedio entre semana.

El área de servicio de BFT contiene una multitud de jurisdicciones, incluyendo seis (6) ciudades repartidas en dos (2) condados. Cada jurisdicción tiene diferentes procedimientos, patrones de desarrollo y normas. También tienen diferentes maneras de manejar los permisos de ROW, otros permisos, y el proceso que BFT debe tomar para realizar el trabajo dentro de la ROW. Teniendo en cuenta la falta de desarrollo consistente adyacente a las rutas fijas de BFT, las políticas que dictan la distribución de los servicios de tránsito a menudo no se pueden aplicar de manera uniforme en toda el área de servicio de BFT. Dicho esto, es obligación de BFT garantizar una distribución equitativa de los servicios de tránsito en la medida de sus posibilidades (Tabla 17).

Tabla 17 – Distribución de los servicios por paradas (promedio de embarque entre semana)

| Amenidad | Básico <5 embarques diarios | Mejorado 5-15 embarques diarios | Refugio >15 embarques diarios |
|--|--|------------------------------------|----------------------------------|
| Sin restricción al estacionamiento | <i>Recomendado en todas las paradas</i> | | |
| Plataforma de aterrizaje ADA de 5' x 8' y espacio libre en el suelo de 3' x 5' | <i>Se requiere en todas las paradas, a menos que esté razonablemente justificado</i> | | |
| Señal de parada de autobús en poste separado | <i>Recomendado en todas las paradas</i> | | |
| Barra para apoyarse | Opcional | Opcional | Opcional |
| Banco | Opcional | Recomendado | Ofrecer |
| Refugio | Opcional | Opcional | Recomendado |
| Vitrina | Opcional | Opcional | Opcional |
| Iluminación | Opcional | Opcional | Recomendado |
| Bote de basura | Opcional | Recomendado | Ofrecer |
| Tablero de información para los pasajeros | Opcional | Recomendado | Ofrecer |
| Soporte para bicicletas * | Opcional | Opcional | Opcional |
| Estación de reparación de bicicletas * | Opcional | Opcional | Opcional |

***Infraestructura para bicicletas recomendada en lugares cerca de caminos multiusos/rutas para bicicletas**

Análisis de la distribución de los servicios de transporte (ruta fija) A partir del 20 de abril de 2022, el sistema de rutas fijas de BFT incluye 977 paradas, de las cuales hay 923 paradas señalizadas y 54 paradas con bandera. Hay 46 refugios, diez (10) refugios planeados (todos los refugios incluyen un banco), 66 bancos independientes y 117 botes de basura (36 de los cuales son la única amenidad en el lugar). Las paradas de bandera son lugares en los que no existe un poste físico, pero en los que los pasajeros pueden hacer señas a un autobús a su llegada.

BFT está eliminando progresivamente el uso de las paradas con banderines, colocando paradas físicas en estos lugares o eliminando la designación si la parada está en un lugar ilógico y experimenta poca o ninguna afluencia de pasajeros. La tabla 18 refleja los servicios por ruta, pero hay que tener en cuenta que los servicios pueden contarse dos veces si hay más de una (1) ruta que sirve a la parada. Tras un análisis más detallado de las ubicaciones actuales de los servicios, se llegó a la conclusión de que no existe ninguna disparidad aparente o intencionada entre las rutas de minorías y sin minorías en relación con la distribución de los servicios de tránsito de BFT.

Tabla 18 – Amenidades por ruta

| Ruta | Total de paradas* | Paradas publicadas | Paradas de bandera | Refugios | Refugios planeados | Bancos (incluye los bancos de los refugios) | Botes de basura | Longitud de la ruta (millas) | Distancia media entre paradas (pies) |
|------|-------------------|--------------------|--------------------|----------|--------------------|---|-----------------|------------------------------|--------------------------------------|
| 1 | 63 | 63 | 0 | 6 | 1 | 15 | 14 | 28.6 | 2,256 |
| 3 | 44 | 41 | 3 | 5 | | 11 | 14 | 11.6 | 1,331 |
| 20 | 46 | 46 | 0 | 4 | | 10 | 11 | 13.8 | 1,481 |
| 25 | 32 | 32 | 0 | 0 | | 0 | 0 | 7.1 | 1,137 |
| 26 | 46 | 42 | 4 | 6 | 1 | 11 | 8 | 11.9 | 1,341 |
| 40 | 46 | 46 | 0 | 7 | | 9 | 11 | 14.3 | 1,511 |
| 41 | 125 | 118 | 7 | 3 | 1 | 7 | 10 | 29.5 | 1,180 |
| 42 | 61 | 60 | 1 | 5 | 1 | 9 | 13 | 14.1 | 1,190 |
| 47 | 96 | 92 | 4 | 3 | | 10 | 12 | 27.7 | 1,450 |
| 48 | 57 | 55 | 2 | 2 | | 7 | 9 | 16.8 | 1,424 |
| 64 | 28 | 27 | 1 | 0 | | 3 | 1 | 6.4 | 1,205 |
| 65 | 48 | 47 | 1 | 3 | | 6 | 5 | 13.7 | 1,478 |
| 66 | 48 | 47 | 1 | 1 | 2 | 2 | 2 | 15.9 | 1,740 |
| 67 | 52 | 50 | 2 | 2 | 4 | 6 | 5 | 15.7 | 1,596 |
| 110 | 90 | 83 | 7 | 6 | | 7 | 11 | 30.1 | 1,686 |
| 123 | 103 | 96 | 7 | 4 | 3 | 15 | 11 | 30.8 | 1,557 |
| 170 | 45 | 32 | 13 | 4 | | 6 | 5 | 67.1 | 5,205 |
| 225 | 72 | 66 | 6 | 3 | 4 | 5 | 5 | 27.9 | 1,966 |
| 268 | 60 | 56 | 4 | 4 | | 7 | 6 | 27.2 | 2,246 |

Nota: Los números no reflejan los centros de tránsito *Las paradas que dan servicio a varias rutas se cuentan dos veces, el total de paradas es mayor que el recuento total de paradas actual.

*Minoría

Tabla 19 – Distribución de la amenidad por rutas de minorías y sin minorías

| Rutas | Total de paradas* | Refugios * | Bancos * | Botes de basura * | Distancia promedio entre paradas de autobús (pies) ** |
|--------------------|-------------------|------------|----------|-------------------|---|
| Sistema | 1,162 | 85 | 146 | 153 | 1,855.6 |
| Rutas de minorías | 704 | 54 | 87 | 95 | 1,645.5 |
| Rutas sin minorías | 458 | 31 | 59 | 58 | 2,070.2 |

*Las paradas que dan servicio a varias rutas se cuentan dos veces, el total de paradas es más elevado que el recuento total de paradas actual.

** Ruta 170 excluida

Análisis de la distribución de los servicios de tránsito (centros de tránsito/estacionamientos y transporte) Cada uno de los principales centros de tránsito y estacionamiento y transporte están ubicados en toda el área de servicio de BFT en lugares que se consideraron apropiados durante las fases de planificación de su construcción. Los centros de tránsito y los estacionamiento y transporte de BFT tienen una distribución equitativa de los servicios. Teniendo en cuenta los diferentes modos de servicio, los problemas de seguridad y funcionamiento, y los niveles de utilización, los servicios como los bancos, los refugios y la iluminación se colocan en función de las necesidades. También hay estanterías para bicicletas y armarios en determinadas instalaciones, aunque los armarios para bicicletas se están eliminando gradualmente. Con la pandemia de COVID-19 que comenzó a principios de 2020, los baños públicos dejaron de estar disponibles en las instalaciones en las que trabaja el personal del Servicio de Atención al Cliente de BFT y todavía no han vuelto a estar disponibles en abril de 2022. En las tablas 20 y 21 se muestra un reparto de la distribución de los servicios en los centros de tránsito y en los lugares de estacionamiento y transporte.

Tabla 20 – Amenidades de los centros de tránsito

| Centros de tránsito | Servicios para pasajeros | Seguridad | Baño público | Armarios y Estantería para asegurar la bicicleta | Designación de grupos minoritarios |
|--|--------------------------|-----------|--------------|--|------------------------------------|
| Centro de tránsito de Three Rivers | Sí | No | No | Sí | Sin minoría |
| Centro de tránsito de Knight St | No | No | No | Sí | Sin minoría |
| Centro de tránsito de la calle 22 | No | No | No | Sí | Minority |
| Columbia Park Trail MOA | Sí | Sí | Sí | Sí | Sin minoría |
| Centro de tránsito de West Richland | No | No | Sí | No | Sin minoría |
| Punto de transferencia de Dayton | No | No | No | Sí | Minoría |
| Centro de Tránsito de la Avenida Stacy | No | No | No | Sí | Minoría |
| Centro de Tránsito Ed Frost | Ya no existe | | | | Minoría |

Table 21 – Propiedades o arrendamientos de estacionamiento y transporte en el área de servicio de BFT (amenidades)

| Estacionamiento y transporte | Ubicación | Capacidad del terreno | Refugio | Baño público | Armarios y Estantería para asegurar la bicicleta | Designación de grupos minoritarios |
|--|---------------|-----------------------|---------|--------------|--|------------------------------------|
| Centro de Tránsito Ed Frost | Kennewick | 96 | Sí | No | Sí | Minoría |
| Estacionamiento y transporte de Tulip Lane | Richland | 139 | Sí | No | Sí | Sin minoría |
| Centro de tránsito de la calle 22 | Pasco | 50 | Sí | No | Sí | Minoría |
| Centro de tránsito de la calle Knight | Richland | 50 | Sí | No | Sí | Sin minoría |
| Centro de tránsito de la Avenida Stacy | Prosser | 20 | Sí | No | Sí | Minoría |
| Estacionamiento y transporte de Richland Wye | Richland | 250 | No | No | Sí | Sin minoría |
| Estacionamiento y transporte de Hapo Center "TRAC" | Pasco | 180 | No | No | No | Minoría |
| Puerto de Benton | Richland | 350 | No | No | No | Sin minoría |
| Centro de tránsito de West Richland | West Richland | 154 | Sí | Sí | No | Sin minoría |

Asignación de vehículos

Declaración de política de servicios Los vehículos de ruta fija se asignan en función de los requisitos operativos de la ruta, como la altura/tamaño, la capacidad de la ruta y el radio de giro. La oficina de expedición completa las asignaciones de autobuses mensualmente y asigna autobuses específicos a bloques concretos. Los autobuses retenidos por mantenimiento u otras razones se sustituyen diariamente por autobuses de la lista de reserva. Los conductores reciben un número de autobús cuando se registran en el despacho. Los vehículos se asignan a las rutas en función de la capacidad de pasajeros y de la necesidad prevista de capacidad. Los vehículos del mismo tamaño se utilizan indistintamente cuando se asignan las rutas diarias. Por lo tanto, los vehículos más nuevos circulan tanto en los barrios de minorías como en los que no lo son. La edad de la flota también se tiene en cuenta a la hora de asignar los vehículos a diferentes rutas/bloques.

Análisis Los datos de asignación de vehículos de rutas fijas desde el 1 de octubre hasta el 31 de diciembre de 2021, concluyeron que no hay disparidad en la forma de asignar los vehículos a las rutas. Los vehículos se asignan a bloques operativos, lo que significa que la mayoría de los vehículos se utilizarán en múltiples rutas durante el curso de un día de servicio. Los bloques que sirven al menos a una ruta de minorías fueron designados como bloque de minorías. A los bloques de minorías se les asignaron vehículos construidos en 2015 en promedio, con una longitud típica de 40 pies y una capacidad de 37 asientos. A los bloques no minoritarios se les asignaron vehículos construidos en 2017 en promedio, con una longitud típica de 35 pies y una capacidad de 35 asientos (Tabla 22).

Aunque a los bloques de minorías se les asignan vehículos más viejos en promedio, los vehículos que se asignan a estas rutas son más grandes y tienen mayor capacidad de asientos. La razón principal por la que los bloques de minorías tienen una edad media mayor se debe al hecho de que las Rutas 110 y 123, que no son de minorías, necesitan vehículos de 35 pies o menos de longitud debido a las maniobras a través de los lugares de estacionamiento y transporte a lo largo de estas rutas. La mayoría de los autobuses de 35 pies o menos son los vehículos más nuevos de la flota de BFT. Esto crea una situación en la que las Rutas 110 y 123 tienden a tener asignados vehículos más nuevos.

Tabla 22 – Asignación de vehículos por ruta

| Bloque | Asignación más frecuente (número de autobús) | Año | Largo | Asientos en el autobús |
|--------|--|------|-------|------------------------|
| 1-1 | 5308 | 2013 | 40 ft | 37 |
| 1-2 | 5264 | 2009 | 40 ft | 37 |
| 1-3 | 5307 | 2013 | 40 ft | 37 |
| 1-4 | 5333 | 2018 | 35 ft | 30 |
| 1-5 | 5262 | 2009 | 40 ft | 37 |
| 1-6 | 5336 | 2009 | 40 ft | 37 |
| 1-7 | 5319 | 2015 | 40 ft | 37 |
| 3-1 | 5316 | 2014 | 40 ft | 37 |
| 3-2 | 5314 | 2014 | 40 ft | 37 |
| 3-3 | 5313 | 2013 | 40 ft | 37 |
| 3-4 | 5320 | 2015 | 40 ft | 37 |
| 20-1 | 5306 | 2013 | 40 ft | 37 |
| 20-2 | 5307 | 2013 | 40 ft | 37 |
| 20-3 | 5308 | 2013 | 40 ft | 37 |
| 25-1 | 5002 | 2016 | 35 ft | 30 |
| 26-1 | 5309 | 2013 | 40 ft | 37 |
| 26-2 | 5310 | 2013 | 40 ft | 37 |
| 40-1 | 5323 | 2015 | 40 ft | 37 |
| 40-2 | 5309 | 2013 | 40 ft | 37 |
| 41-1 | 5310 | 2013 | 40 ft | 37 |
| 41-2 | 5339 | 2018 | 40 ft | 37 |

| | | | | |
|-------|------|------|--------|----|
| 42-1 | 5338 | 2018 | 40 ft | 37 |
| 42-2 | 5259 | 2016 | 35 ft | 30 |
| 47-1 | 5335 | 2018 | 35 ft | 30 |
| 47-2 | 5313 | 2013 | 40 ft | 37 |
| 47-3 | 5316 | 2014 | 40 ft | 37 |
| 48-1 | 5001 | 2016 | 35 ft | 30 |
| 48-2 | 5324 | 2018 | 40 ft | 37 |
| 48-3 | 5321 | 2015 | 40 ft | 37 |
| 64-1 | 5258 | 2016 | 35 ft | 30 |
| 64-2 | 5327 | 2018 | 35 ft | 30 |
| 65-1 | 5253 | 2006 | 40 ft | 37 |
| 65-2 | 5320 | 2015 | 40 ft | 37 |
| 66-1 | 5325 | 2015 | 40 ft | 37 |
| 67-1 | 5312 | 2013 | 40 ft | 37 |
| 110-1 | 5254 | 2007 | 29 ft | 23 |
| 110-2 | 5329 | 2018 | 29 ft | 23 |
| 123-1 | 5339 | 2018 | 29 ft | 23 |
| 123-2 | 5338 | 2018 | 29 ft | 23 |
| 123-3 | 5340 | 2016 | 29 ft | 23 |
| 123-4 | 5338 | 2016 | 29 ft | 23 |
| 170-1 | 5331 | 2018 | 35 ft | 30 |
| 225-1 | 5332 | 2018 | 40 ft | 30 |
| 225-2 | 5002 | 2009 | 35 Ft | 37 |
| 225-3 | 5333 | 2018 | 35 ft | 30 |
| 268-1 | 5345 | 2018 | 40 ft | 37 |
| 268-2 | 5319 | 2015 | 40 ft | 37 |
| 268-3 | 5262 | 2009 | 40 Ft. | 37 |

***Rutas de Minoría**

Tabla 23 – Asignación de vehículos por bloques minoritarios y sin minorías

| Factor de carga promedio entre semana | | | | | |
|--|----------------------|----------------------------|-------------------------------|----------------------------|------------------|
| Ruta | Dirección | Frecuencia en la AM | Frecuencia de mediodía | Frecuencia en la PM | Tarde |
| 1 | Este | 0.04 | 0.12 | 0.17 | 0.12 |
| | Oeste | 0.07 | 0.13 | 0.15 | 0.11 |
| 3 | Norte | 0.08 | 0.14 | 0.23 | 0.18 |
| | Sur | 0.06 | 0.14 | 0.26 | 0.17 |
| 20 | Este | 0.13 | 0.12 | 0.14 | 0.10 |
| | Oeste | 0.07 | 0.11 | 0.19 | 0.16 |
| 25 | Salida al Oeste | 0.06 | 0.12 | 0.18 | 0.11 |
| 26 | Norte | 0.07 | 0.14 | 0.27 | 0.30 |
| | Sur | 0.05 | 0.14 | 0.29 | 0.29 |
| 40 | Este | 0.04 | 0.09 | 0.17 | 0.18 |
| | Oeste | 0.06 | 0.11 | 0.16 | 0.14 |
| 41 | De regreso al OesteW | 0.04 | 0.06 | 0.12 | 0.09 |
| | Salida al Oeste | 0.04 | 0.09 | 0.21 | 0.00 |
| 42 | Este | 0.06 | 0.11 | 0.20 | 0.13 |
| | Oeste | 0.09 | 0.13 | 0.18 | 0.12 |
| 47 | Este | 0.07 | 0.13 | 0.19 | 0.18 |
| | Oeste | 0.07 | 0.12 | 0.18 | 0.20 |
| 48 | Este | 0.03 | 0.09 | 0.16 | 0.17 |
| | Oeste | 0.06 | 0.11 | 0.15 | 0.14 |
| 64 | Este | 0.03 | 0.11 | 0.24 | 0.39 |
| | Oeste | 0.08 | 0.12 | 0.23 | 0.38 |
| 65 | Este | 0.05 | 0.11 | 0.23 | 0.20 |
| | Oeste | 0.12 | 0.12 | 0.20 | 0.20 |
| 66 | Este | 0.06 | 0.09 | 0.15 | 0.14 |
| | Oeste | 0.12 | 0.12 | 0.25 | 0.40 |
| 67 | Este | 0.07 | 0.14 | 0.25 | 0.35 |
| | Oeste | 0.07 | 0.11 | 0.16 | 0.10 |
| 110 | Este | 0.06 | 0.08 | 0.12 | Sin viaje |
| | Oeste | 0.03 | 0.07 | 0.13 | Sin viaje |
| 123 | Norte | 0.08 | 0.16 | 0.24 | 0.21 |
| | Sur | 0.09 | 0.16 | 0.23 | 0.18 |
| 170 | Este | 0.06 | 0.14 | 0.11 | 0.08 |
| | Oeste | 0.02 | 0.08 | 0.13 | 0.07 |
| 225 | Este | 0.06 | 0.12 | 0.16 | 0.11 |
| | Oeste | 0.07 | 0.12 | 0.15 | 0.11 |
| 268 | Este | 0.02 | 0.08 | 0.16 | 0.17 |
| | Oeste | 0.07 | 0.08 | 0.12 | 0.08 |

| | Rutas de Minoría | | | |
|--|---------------------|------------------------|---------------------|-------|
| | Frecuencia en la AM | Frecuencia de mediodía | Frecuencia en la PM | Tarde |
| Promedio del sistema | 0.06 | 0.11 | 0.18 | 0.17 |
| Promedio de la ruta de las minorías | 0.06 | 0.11 | 0.19 | 0.17 |
| Promedio de rutas sin minorías | 0.07 | 0.12 | 0.18 | 0.17 |

3.3 REVISIÓN DEL ANÁLISIS DE LA EQUIDAD 2018-2022

Cambios en el servicio y las tarifas

BFT define un cambio de servicio importante como aquel que "afecta al menos al 20% de la asignación de horas de servicio diario de una ruta o de la cobertura geográfica". BFT prepara y presenta todos los análisis de equidad que se llevaron a cabo durante el período de supervisión del servicio anterior a la FTA con los documentos del Programa del Título VI cada tres (3) años. Tras la revisión, BFT realizó un cambio de servicio importante en septiembre de 2017 y en junio de 2021 y no ha realizado ningún cambio en las tarifas desde 2012.

BFT prepara un análisis del Título VI para las tarifas y los cambios de servicio importantes utilizando la guía de análisis proporcionada por la FTA. Además, BFT continuará evaluando el servicio como se indica en el Título VI utilizando el siguiente proceso:

3.4 PRINCIPALES CAMBIOS DE SERVICIO IMPLEMENTADOS (2019-2022)

Se realizaron varios cambios importantes en el servicio desde 2019 hasta principios de 2022. El primer cambio de servicio importante que se realizó fue la adición de la Ruta 268 en 2020, que junto con la ruta 225 proporcionó una frecuencia de 15 minutos entre Pasco y Richland. La ruta 268 fue precedida por un servicio de demostración, la ruta 68, que tenía como objetivo aumentar el servicio en el oeste de Pasco. Se realizó un análisis de la equidad del servicio y no se anticiparon efectos adversos.

En junio de 2021, BFT implementó otros cambios importantes en el servicio que crearon dos nuevos corredores de alta frecuencia y reajustaron los servicios locales en Richland y Kennewick. Estos cambios dieron como resultado un servicio de mayor frecuencia entre todos los centros de tránsito principales en el área de servicio, así como un nuevo servicio local en Kennewick.

Como parte del proceso de implementación, BFT llevó a cabo un análisis de equidad de servicio del Título VI ruta por ruta con la intención de entender mejor cómo los cambios de servicio de ruta fija planificados afectarían a las poblaciones de bajos ingresos y minorías (Tabla 24). Los detalles de este análisis de equidad de servicio se pueden encontrar en el **Apéndice E**.

Tabla 24 – 2019 - 2022 Resumen de cambios importantes en el servicio

| Ruta | Cambio de servicio principal | | Notas |
|------|------------------------------|-------------------|---|
| | Alineación de la ruta | Horas de ingresos | |
| 1 | X | + | Combinación de porciones de las Rutas 126, 120, 150 y 160. Aumento del servicio en frecuencias fijas de 15 minutos |
| 3 | X | + | Porciones combinadas de las Rutas 150 y 160. Aumento del servicio a frecuencias fijas de 15 minutos |
| 20 | X | | Alineación truncada de la Ruta 120 en la calle Knight |
| 26 | X | | Alineación truncada de la Ruta 126 en la calle Knight |
| 40 | X | X | Nueva ruta de 30 minutos en Kennewick que da servicio a partes de la avenida de Clearwater, calle de Olympia y la calle de Dayton |
| 268 | X | X | New 30-minute route that serves CBC, Chiawana High School, and provides additional trips between Pasco and Richland |

3.5 CAMBIOS DE TARIFAS IMPLEMENTADOS (2018 - 2022)

BFT no ha implementado ningún cambio en la política de tarifas desde la actualización del Título VI de 2018.

BFT no cobró tarifas de ningún tipo de marzo de 2020 hasta octubre de 2021 debido a la pandemia de COVID-19.

A partir del verano de 2022, BFT implementará un programa por 6 meses sin tarifas para niños de 18 años o menos.

CONCLUSIÓN

El análisis de los servicios de BFT muestra que no existe un impacto dispar o una carga desproporcionada en la forma en que BFT distribuye el servicio o los servicios dentro del PTBA. Del mismo modo, los recientes cambios de servicio emprendidos por BFT han dado lugar a una mejora en el servicio a las zonas de minorías y de bajos ingresos. BFT seguirá dando prioridad a las necesidades de las comunidades minoritarias y de bajos ingresos cuando planifique futuros cambios de servicio.

APPENDIX A



TITLE VI COMPLAINT FORM

Title VI of the 1964 Civil Rights Act requires that “No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” If you feel you have been discriminated against in transit services, please provide the following information in order to assist us in processing your complaint and send it to:

Ben Franklin Transit
Title VI Coordinator
1000 Columbia Park Trail
Richland, WA 99352
(509) 734 5107
(509) 735 4392 (fax)

Do you need complaint assistance?

If you are unable to complete a written complaint due to a disability or if information is needed in another language we can assist you. Please contact us at (509) 735-5100.

PLEASE PRINT CLEARLY

SECTION I

Today's Date:

Name:

Street address:

City:

State:

Zip Code:

Home Phone #:

Cell Phone #:

Work Phone #:

Email:

Do you require an accessible format?

Large Print

TTY/TDD

Audio Tape

Other

SECTION II

Are you filing this complaint on your own behalf?

* Yes

No

** If you answered "yes" to this question, go to Section III*

If not, please supply the name and relationship of the person for whom you are filing:

Name:

Relationship:

Address of person discriminated against:

City:

State:

Zip Code:

Have you obtained permission from this person?

Yes

No

Please explain why you have filed on behalf of this person:

SECTION III

I believe the discrimination I experienced was based on (check all that apply):

Race

Color

National Origin

Other (explain) _____

Date of Alleged Discrimination (Month, Day, Year): _____ Time: _____

Type of Transit: Dial A Ride Fixed Route Other: _____

Transit Line / Route: _____ Vehicle ID or Name: _____ Location: _____

Name(s) of Employee(s) involved: _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Use the back of this form if needed for more space.

What type of corrective action would you like to see taken? _____

SECTION IV

Have you previously filed an Title IV complaint with BFT? Yes No

BFT Contact Name: _____ Telephone Number: _____

SECTION V

Have you filed this complaint with any other Federal, State, or Local Agency, or with any Federal or State Court?

Yes No

If Yes, check all that apply:

- | | |
|--|---|
| <input type="checkbox"/> Federal Agency: | <input type="checkbox"/> Federal Court: |
| <input type="checkbox"/> State Agency: | <input type="checkbox"/> State Court: |
| <input type="checkbox"/> Local Agency: | <input type="checkbox"/> Local Court: |

Please provide contact information for the person you spoke to at the above Agency:

Name: _____ Title: _____

Agency: _____ Telephone: _____

Address: _____ City: _____ State: _____ Zip: _____

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

Your signature and date is required to file this complaint.

Complainants Signature: _____ Date: _____

If information is needed in another language, please call 509-735-5100
Si se necesita información en otro idioma, por favor llame a 509-735-5100





TÍTULO VI FORMULARIO DE QUEJA

El Título VI de la Ley de Derechos Civiles de 1964 requiere que "Ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, pueda ser excluida de participar, negarse a los beneficios ni ser objeto de discriminación en ningún programa o actividad que recibe asistencia financiera federal ". Si cree que ha sido discriminado en los servicios de tránsito, proporcione la siguiente información para ayudarnos a procesar su queja y enviarla a:

Ben Franklin Transit
Title VI Coordinator
1000 Columbia Park Trail
Richland, WA 99352
(509) 734 5107
(509) 735 4392 (fax)

¿Necesita ayuda con su queja?

Si no puede completar una queja por escrito debido a una discapacidad o si necesita información en otro idioma, podemos ayudarlo. Por favor contáctenos al (509) 735-5100.

POR FAVOR IMPRIMA CLARAMENTE

SECCIÓN I

Fecha:

Nombre:

Dirección:

Ciudad:

Estado:

Código postal:

Teléfono (Casa):

Teléfono (Móvil) #:

Teléfono (Trabajo) #:

Correo Electrónico:

¿Necesita un formato accesible??

Letra grande

TTY/TDD

Cinta de audio

Otro

SECCIÓN II

¿Está presentando esta queja en su propio nombre?

Sí*

No

* Si respondió "sí" a esta pregunta, vaya a la Sección III

Si no es así, proporcione el nombre y la relación de la persona para la que está presentando la solicitud:

Nombre:

Relación:

Dirección de la persona discriminada:

Ciudad:

Estado:

Código postal:

¿Ha obtenido permiso de esta persona?

Sí

No

Por favor explique por qué ha presentado en nombre de esta persona:

SECCIÓN III

Creo que la discriminación que experimenté se basó en (marque todo lo que corresponda):

Raza

Color

Origen nacional

Otro (explicar) _____

Fecha de presunta discriminación (Mes, Día, Año): _____ Hora: _____

Tipo de tránsito: Dial-A-Ride Autobús Otro: _____
Ruta: _____ Identificación o nombre del vehículo: _____ Ubicación: _____

Nombre del empleado involucrado: _____

Explique lo más claramente posible qué sucedió y por qué cree que lo discriminaron. Use la parte posterior de este formulario si es necesario para obtener más espacio.

¿Qué tipo de acción correctiva le gustaría ver tomada? _____

SECCIÓN IV

¿Ha presentado anteriormente una queja del Título IV con BFT? Sí No
BFT Empleado: _____ Número de teléfono: _____

SECCIÓN V

¿Ha presentado esta queja ante cualquier otra agencia federal, estatal o local, o ante un tribunal federal o estatal? Sí No

En caso afirmativo, marque todo lo que corresponda:

- Agencia Federal: Corte Federal:
- Agencia Estatal: Corte Estatal:
- Agencia Local: Corte Local:

Proporcione la información de contacto de la persona con la que habló en la Agencia mencionada anteriormente:

Nombre: _____ Título: _____
Agencia: _____ Teléfono: _____
Dirección: _____ Ciudad: _____ Estado: _____ Código postal: _____



Se requiere su firma y fecha para presentar esta queja.

Firma: _____ Fecha: _____

If information is needed in another language, please call 509-735-5100
Si se necesita información en otro idioma, por favor llame a 509-735-5100

APPENDIX B

LANGUAGE ASSISTANCE PLAN

Four Factor Analysis & Implementation

BEN FRANKLIN **TRANSIT**

PLAN DE ASISTENCIA LINGÜÍSTICA

Análisis de cuatro factores y Implementación

PREPARED BY: PLANNING
AND
SERVICE DEVELOPMENT

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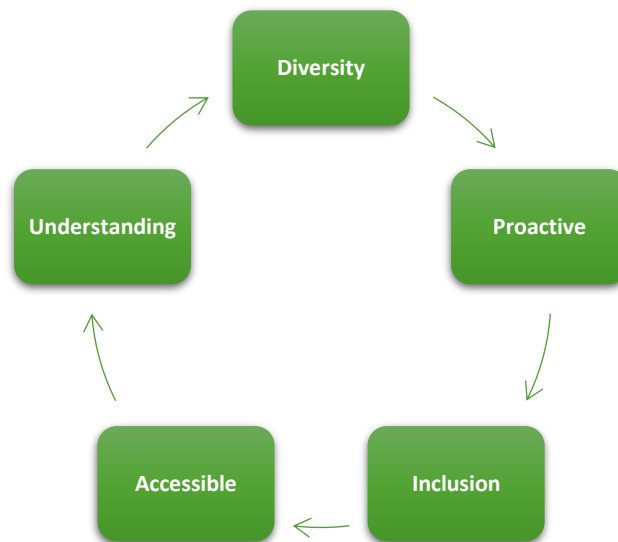
Introduction

Ben Franklin Transit (BFT) operates fixed route, paratransit, and rideshare programs in the Public Transportation Benefit Area (PTBA) established in accordance with Chapter 36.57A of the Revised Code of Washington (RCW). The PTBA encompasses 617 square miles within Benton and Franklin counties in the southeast section of Washington State. This area includes the cities of Kennewick, Pasco, Richland, West Richland, Benton City, Prosser, and certain unincorporated areas of Benton and Franklin County.

The population of BFT’s PTBA is diverse and is comprised of a sizable number of individuals who have limited or no English proficiency. These individuals are referred to as Limited English Proficiency (LEP) persons. LEP persons are defined as those individuals for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. This includes individuals who reported to the U.S. Census that they speak English “less than very well”, “not well”, or “not at all.”

BFT is committed to breaking down language barriers that exist for these LEP persons by implementing consistent standards of language assistance across its program of service. BFT and its governing body have recognized that our community is diverse and a proactive approach must be taken to ensure public transit is easily accessible to all by implementing tools to reduce language barriers.

Figure 1 – BFT’s commitment to breaking down barriers



This two-part document is intended to ensure that there continues to be meaningful access to BFT’s program of transit services. It also demonstrates BFT’s compliance with Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency,” which directs federal financial recipients to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. The first section details the results of BFT’s Four Factor Analysis, which has been conducted in accordance with the Title VI of the Civil Rights Act of 1964 and meets the requirements within FTA Circular 4702.1B. The second section outlines BFT’s Language Assistance Plan, which is used as a guide to ensure

that insight gained from the Four-Factor Analysis is acted upon in a way that bolsters accessibility to BFT’s transit services through language assistance both written and verbal.

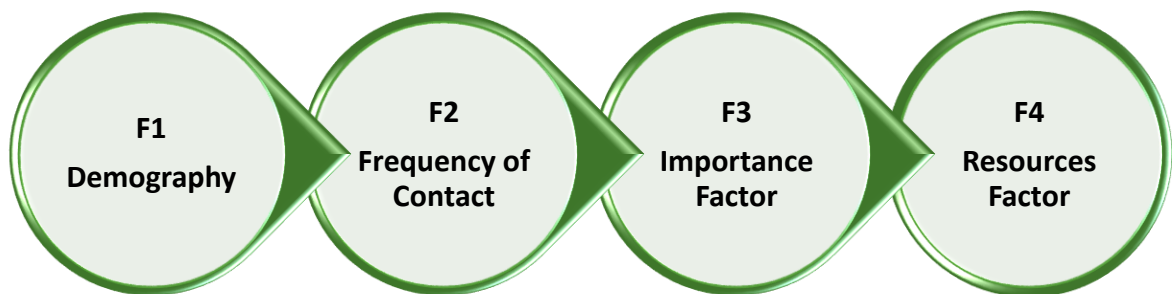
Four Factor Analysis

The U.S. Department of Transportation (USDOT) recommends using a four factor LEP Analysis to determine the need for language assistance measures. The four factors are:

- 1. Demography Factor:**
The number or proportion of LEP persons eligible to be served or likely to be encountered by BFT’s program of services.
- 2. Frequency of Contact Factor:**
The frequency with which LEP individuals come in contact with BFT’s program of services.
- 3. Importance Factor:**
The nature and importance of BFT’s program of services to people’s lives.
- 4. Resources Factor:**
The resources available for LEP outreach, as well as the costs associated with that outreach.

Ben Franklin Transit has conducted a Four Factor Analysis to meet requirements outlined in Title VI of the Civil Rights Act of 1964, which seeks to improve access to services for persons with Limited English Proficiency (LEP). The Four-Factor Analysis results in a better understanding of the needs of LEP populations and determines what LEP language groups must be provided written translation of vital documents in accordance with the Department of Justice’s (DOJ) Safe Harbor Provision.

Figure 2 – Four Factor Analysis

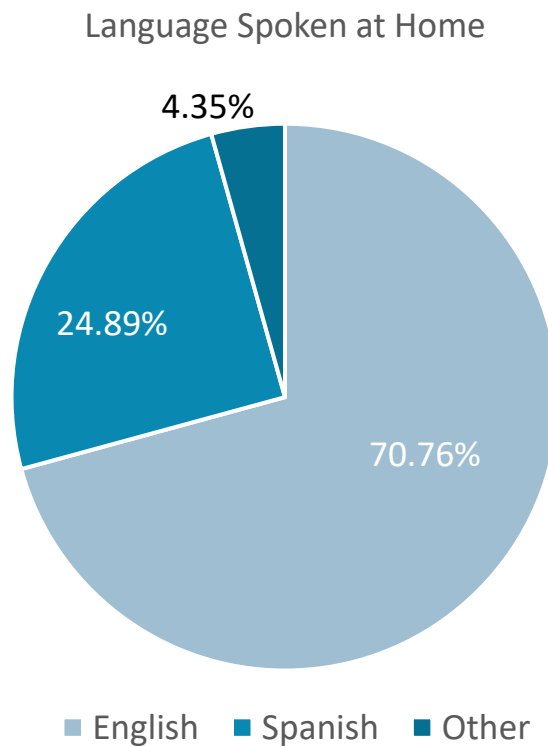


Factor #1: The number or proportion of LEP Persons served

US Census Bureau’s American Community Survey (ACS) data was utilized to determine the numbers and portions of the LEP population that reside within BFT’s PTBA and surrounding areas. BFT’s service area does not include the total area of Benton and Franklin counties but does include major populated portions of each including; Pasco, Richland, Kennewick, West Richland, Prosser, Benton City and unincorporated areas of each county.

According to 2020 ACS data, BFT’s service area consists of primarily English-speaking individuals who make up an estimated 70.76% of the population. An estimated 29.25% of the population speaks a language other than English. Many of these individuals speak Spanish. They make up 24.89% of the total population of BFT’s service area.

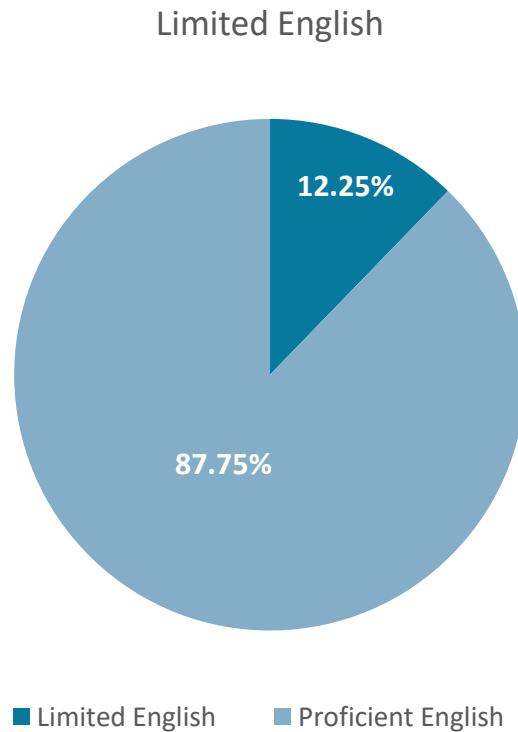
Figure 3 – Service Area Language Profile



Source: U.S. Census Bureau, 2015-2020 American Community Survey 5-Year Estimates

Although more than ¼ of the population living in BFT’s service area speak a language other than English, more than half of these individuals are proficient in English. It is estimated that 12.25% of the population is considered to have limited English proficiency and thereby defined as LEP persons.

Figure 4 – Service Area Limited English Proficiency Profile



Source: U.S. Census Bureau, 2015-2020 American Community Survey 5-Year Estimates

Spanish speakers make up the majority of LEP and constitute 11.6% of the total population, which exceeds DOJ’s Safe Harbor Provision thresholds. The Safe Harbor Provision stipulates that a recipient must provide written translations of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 individuals. Spanish speakers are the only LEP language group in which BFT is required to provide written translation of vital documents. See Table 1 and Map 1 for further detail on LEP populations and their residence in relation to BFT’s facilities and transit service.

Table 1 – Language Spoken at Home - Benton & Franklin County

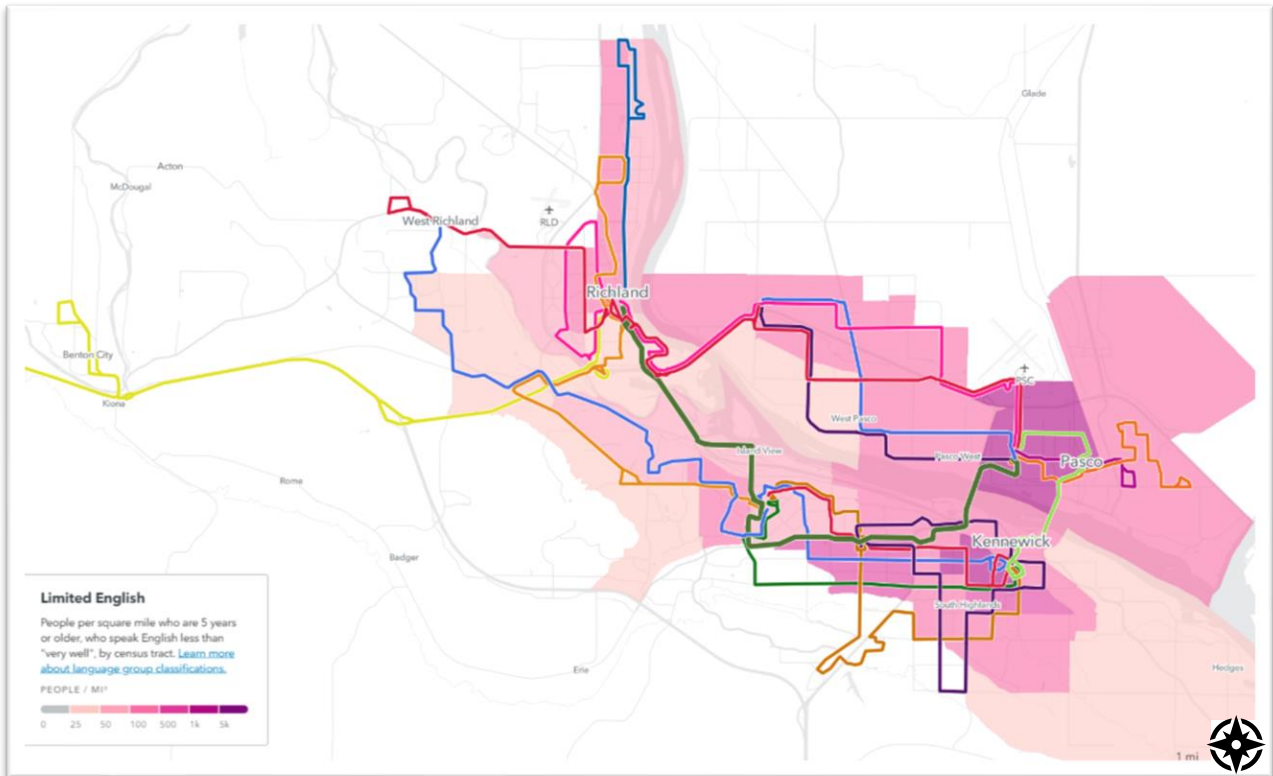
| Language | Benton | Franklin | Combined | Population |
|-------------------------------------|----------------|---------------|----------------|------------|
| | County | County | | |
| Population 5 Years and Older | 186,747 | 85,308 | 272,055 | |
| Speak only English | 147,786 | 44,746 | 192,532 | 70.76% |
| Spanish or Spanish Creole | 29,577 | 37,856 | 67,433 | 24.89% |
| French (incl. Patois, Cajun) | 299 | 146 | 445 | 0.15% |
| Russian | 1,925 | 1,210 | 3,135 | 1.15% |
| Vietnamese | 576 | 265 | 841 | 0.25% |
| German or West Germanic | 498 | 112 | 610 | 0.19% |
| Chinese | 697 | 46 | 743 | 0.28% |
| Tagalog (Incl. Filipino) | 599 | 211 | 810 | 0.29% |
| Arabic | 1,013 | 19 | 1,032 | 0.41% |
| Korean | 209 | 17 | 226 | 0.09% |
| Greek | 75 | 5 | 80 | 0.04% |
| Serbo-Croatian or Other Slavic | 982 | 216 | 1,198 | 0.54% |
| Other and unspecified | 848 | 693 | 1,641 | 0.96% |

Source: U.S. Census Bureau, 2020 American Community Survey Estimates

Factor # 2: The frequency with which LEP Individuals come into contact with BFT’s Program of Service

BFT’s PTBA includes Benton County which is largely English-speaking and Franklin County which has a large Spanish-speaking population. BFT services that are utilized by LEP Persons include fixed route bus service, Dial-A-Ride service (DAR), General Demand Response, and Vanpools. LEP persons also access information about BFT services through customer service, fare purchase locations, our [Transit System Guide](#), and the [BFT website](#). Additionally, BFT conducts outreach in the community about our programs, services, and any proposed changes to those services through public hearings.

Map 1 – BFT PTBA Limited English Proficiency Population Percentage by Block Group



Source: U.S. Census Bureau, 2020 American Community Survey Estimates

BFT’s 2022 Fixed Route On-Board Rider Survey data showed out of the roughly 1,900 people surveyed about 22.9% speak Spanish, some of which still listed English as a language that is spoken at home. BFT’s 2018 DAR On-Board Rider Survey data showed out of the roughly 300 people surveyed about 7.7% speak Spanish, while 1.7% of respondents reported speaking a language other than English or Spanish.

Table 2 – 2022 Fixed Route On-Board Rider Survey Languages Spoken at Home

| Language | English | Spanish | Russian | Chinese | Vietnamese | Other |
|------------|---------|---------|---------|---------|------------|-------|
| Percentage | 73.71% | 22.82% | 0.20% | 0.25% | 0.3% | 3.9% |
| Total | 1,455 | 450 | 5 | 6 | 5 | 52 |

Table 3 – 2018 DAR On-Board Rider Survey Languages Spoken at Home

| Language | English | Spanish | Russian | Chinese | Vietnamese | Other |
|------------|---------|---------|---------|---------|------------|-------|
| Percentage | 98.9% | 7.7% | 0.0% | 0.0% | 0.0% | 1.7% |
| Total | 290 | 21 | 0 | 0 | 0 | 5 |

Factor #3: The nature and importance of the Services, Programs, and Activities

According to BFT’s 2022 On-Board Rider Survey, 28% of riders surveyed were traveling to work, 22% were traveling to school, 22% were traveling for recreation and 27% were traveling for medical appointments or other reasons. Spanish-speaking riders reported utilizing our services to access personal business, travel to home, school or college, medical appointments, and shopping.

Furthermore, it was found that roughly 8% of the total working LEP population of Benton and Franklin counties utilize public transportation to get to and from work. This indicates that BFT’s transit services are vital to a notable portion of the LEP population.

Table 4 – Means of Transportation to Work

| Means of Transportation to Work | Total | LEP Pop. | % of Total | Spanish LEP Pop. | % of Total |
|---|---------|----------|------------|------------------|------------|
| Workers 16 and over | 128,164 | 16,902 | 13% | 14,355 | 11% |
| <i>Car, truck, or van - drove alone</i> | 101,013 | 12,739 | 12% | 11,041 | 10% |
| <i>Car, truck, or van - carpooled</i> | 14,939 | 4,176 | 27% | 3,549 | 24% |
| <i>Public transportation</i> | 816 | 89 | 10% | 63 | 8% |

Factor #4: Resources available to recipients and the cost

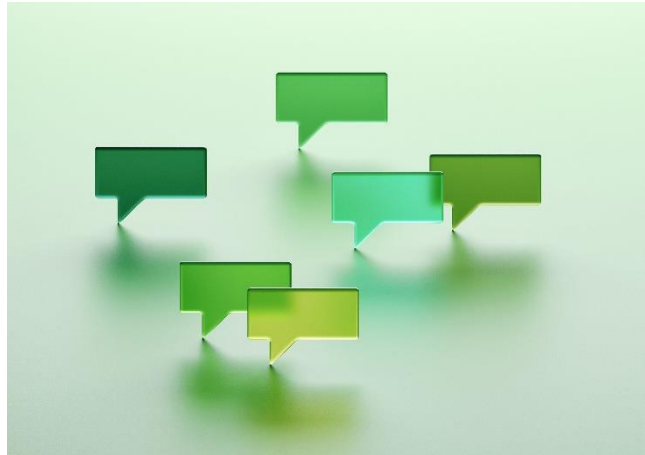
BFT currently has 20% of the bilingual staff fluent in Spanish and English. Spanish-speaking staff use their multilingual skills to serve as interpreters as needed to assist LEP persons who need assistance with our programs, services, and activities.

Ben Franklin Transit believes in disseminating any and all information through multiple means. BFT utilizes the [website](#), transfer centers, community centers, staff, and the following media outlets; Tri-City Herald, KNDU, KVEW, KEPR, Univision, KONA/KZHR (Cherry Creek Media), KFLD (Townsquare Media), NWPR, SMG Northwest, Tri-Cities Area Journal of Business/Senior Times, Tú Decides, La Voz, Bustos Media, Eagle Media.

Table 5 – Staff Fluent in Spanish & Other Languages

| Department | Staff | Spanish-speaking | Other Languages | Percentage of Staff |
|------------------|-------|------------------|-----------------|---------------------|
| Vanpool | 4 | 1 | 0 | 25% |
| Demand Response | 15 | 2 | 0 | 13% |
| Customer Service | 7 | 2 | 0 | 28% |
| Planning Staff | 9 | 2 | 0 | 22% |
| Total | 35 | 7 | 0 | 20% |

BFT also recognizes the need to have language services in other languages besides Spanish and has implemented a language line service through Language Line SolutionsSM to address that need. Their services have been available to the community since January 2019. While Language Line Solutions has been very helpful, BFT is actively seeking other options since their contract is about to expire. Additionally, BFT has hired a bilingual (Spanish/English) Travel Trainer as part of an outreach program where customers are taught how to ride the bus through seminars and one-on-one assistance. Community outreach programs are in the works for Fall 2023 to allow time to hire bilingual staff.



BFT prints its [Transit System Guides](#) and other informational publications in both English and Spanish. The guides are available in [digital](#) and print format. BFT budgets \$50,000 per year to print [Transit System Guides](#), informational posters, and public notice flyers in English and in Spanish. This budget also includes the costs needed to produce the Language Line flyers. Table 6 to 8 illustrate Language Line SolutionsSM Statistic from January 2020 to March 2022.

Table 6 – Language Line SolutionsSM Statistic for 2020

| 2020 | Other Language Calls | Spanish Language Calls | Est. Lang. Line Usage | Lang. Line Percentage |
|-----------|----------------------|------------------------|-----------------------|-----------------------|
| January | 21 | 19 | 2 | 9.52% |
| February | 36 | 30 | 6 | 16.67% |
| March | 38 | 29 | 9 | 23.68% |
| April | 43 | 30 | 13 | 30.23% |
| May | 30 | 21 | 9 | 30.00% |
| June | 40 | 27 | 13 | 32.50% |
| July | 33 | 22 | 11 | 33.33% |
| August | 49 | 37 | 12 | 24.49% |
| September | 51 | 33 | 18 | 35.29% |
| October | 56 | 30 | 26 | 46.43% |
| November | 72 | 46 | 26 | 36.11% |
| December | 40 | 31 | 9 | 22.50% |
| | 509 | 355 | 154 | 30.26% |

Table 7 – Language Line SolutionsSM Statistic for 2021

| 2021 | Other Language Calls | Spanish Language Calls | Est. Lang. Line Usage | Lang. Line Percentage |
|-----------|----------------------|------------------------|-----------------------|-----------------------|
| January | 35 | 24 | 11 | 31.43% |
| February | 30 | 20 | 10 | 33.33% |
| March | 29 | 20 | 9 | 31.03% |
| April | 35 | 23 | 12 | 34.29% |
| May | 30 | 21 | 9 | 30.00% |
| June | 43 | 24 | 19 | 44.19% |
| July | 33 | 18 | 15 | 45.45% |
| August | 36 | 25 | 11 | 30.56% |
| September | 31 | 15 | 16 | 51.61% |
| October | 30 | 12 | 18 | 60.00% |
| November | 32 | 12 | 20 | 62.50% |
| December | 21 | 12 | 9 | 42.86% |
| | 385 | 226 | 159 | 41.30% |

Table 8 – Language Line SolutionsSM Statistic for January to April 2022

| 2022 | Other Language Calls | Spanish Language Calls | Est. Lang. Line Usage | Lang. Line Percentage |
|----------|----------------------|------------------------|-----------------------|-----------------------|
| January | 32 | 17 | 15 | 46.88% |
| February | 15 | 7 | 8 | 53.33% |
| March | 13 | 8 | 5 | 38.46% |
| April | - | - | - | - |
| | 60 | 32 | 28 | 46.67% |

Language Assistance Plan Implementation

Insight gathered from BFT’s Four-Factor Analysis indicates that Spanish-speaking LEP persons are the largest language group within BFT’s service area and the most likely to encounter the agency’s programs and services. Persons within the LEP population represent an estimated 12.25% of the total population, 11.6% of which speak Spanish. No other language group has a population of LEP persons that exceed the 5%, or 1,000 person threshold outlined in the DOJ’s Safe Harbor Provision. However, BFT recognizes the needs of other LEP populations and will continue to monitor the demographics. BFT will also survey the information to determine if and when other LEP populations are in need of further language assistance.

The fact that Spanish-speaking LEP persons exceed the DOJ’s Safe Harbor Provision threshold necessitates BFT to provide vital documents in both Spanish and English. Vital documents include but aren’t limited to [transit system guides](#), ADA paratransit eligibility applications, customer comment/complaint cards, [Title VI complaint forms](#), and public notices. These documents are already translated and available for Spanish-speaking customers to utilize. BFT is also currently working on translating the following ADA documents for Spanish-speaking customers to utilize:

- DAR Notice of Appeal
- DAR No Show Policy
- DAR Application
- DAR Policies
- DAR Appeal Guidelines (still under development)

BFT recognizes that providing document translation is only one of the ways to ensure LEP persons have meaningful access to transit. Other efforts must be made to reduce language barriers and continue to facilitate inclusive transit service. In order to promote the culture of inclusivity, BFT has identified the following specific steps or tasks that will continually be addressed.

Task #1: Improve and Maintain Language Assistance Services & Outreach Efforts

As indicated in earlier sections, BFT has strong methods in place to ensure LEP persons could access BFT services. Table 9 lists BFT’s language assistance services, locations, and any recommended actions or responsibilities that have been identified through the Four-Factor Analysis and when they will likely be implemented.

Table 9 – Language Assistance Services

| Item | Where Available | Recommended Action | Projected Timeline |
|------------------------|---|---|--------------------|
| Language Line Services | LEP person calls in to Customer Service where a representative contacts Language Line Solutions SM and requests the language needed. | Continue using the Language Line Solutions SM and tracking of call usage until end of contract. We are actively seeking other available translation service options and will continue to use this type of service. | Ongoing |

| | | | |
|---|--|--|---------|
| Translated Media Releases | Ben Franklin Transit has always ensured dissemination of information through multiple media outlets and translations at Tri-City Herald, KNDU, KVEW, KEPR, Univision, KONA/KZHR (Cherry Creek Media), KFLD (Townsquare Media), NWPR, SMG Northwest, Tri-Cities Area Journal of Business/Senior Times, Tú Decides, La Voz, Bustos Media, Eagle Media. | Continue ensuring that media releases are translated and disseminated accordingly to LEP persons. | Ongoing |
| “Travel Training” Training for LEP persons | Ben Franklin Transit Travel Trainers provide training on a regular basis and have a full-time Spanish-speaking Travel Trainer to ensure that large portion of Spanish speaking LEP persons are being served. | Continue these services and ensure that staff levels allow the travel training program to have a Spanish-speaking employee. | Ongoing |
| Interpreter at Board meetings and public hearings | Ben Franklin Transit provides interpreters at all public hearings to ensure that Spanish-speaking LEP persons can come and engage our staff. | Continue these services. | Ongoing |
| Transit System Guide | Ben Franklin Transit has available a detailed book that has maps, schedules, fares and all services available in Spanish along with Title VI disclaimer located on the first page of the book . The detailed guide is available in digital and printed format for free to the public on all buses and in offices. | BFT continues to print and update these books to ensure that information is readily available to the public. | Ongoing |
| Passenger Surveys in Spanish | Ben Franklin Transit conducts ridership surveys as needed and makes surveys available in Spanish. | Continue conducting surveys with Spanish-translated questions. | Ongoing |
| Comment/Complaint Cards | Comment/complaint cards are located on all Ben Franklin Transit buses and at transit centers, including in Spanish. | Ben Franklin Transit makes customer comment/complaint cards available in Spanish at any location the English version is available. | Ongoing |

| | | | |
|---|---|--|-----------------------------|
| Translated Agency Website | Ben Franklin Transit's website can be translated to over 100 different languages via Google Translate. | Continue utilizing Google Translate on updated versions of website. | Ongoing |
| Language Line Flyer | Ben Franklin Transit fixed route buses. | Distribute flyers that give LEP individuals information about BFTs language line services | Ongoing |
| Facebook & Twitter | Ben Franklin Transit has established Twitter and Facebook accounts and monitors public comments and messages regularly. Staff use embedded translation services in these platforms, or other tools, to communicate with Spanish-speaking customers. | Continue to monitor and respond to customer comments via social media. Make efforts to communicate with LEP persons via social media. | Ongoing |
| Voicemail/ Message Machine – Spanish Option | Spanish translation request can be made when customers call in. | Establish an agency phone menu with a Spanish information option for after-hours calls. | In progress Summer 2023 |
| Targeted Outreach to LEP Populations | BFT seeks out and actively engages in community outreach activities tailored to the Spanish-speaking public. Services were temporarily halted due to COVID-19 pandemic restrictions. We are working to start program back up now that Covid restrictions have been lifted. | Continue to proactively identify a variety of outreach opportunities that allow BFT staff to provide information about services to the Spanish-speaking community. Community outreach programs are in the works for Fall 2023 to allow time to hire bilingual staff. | Fall 2023 Implementation |

Task #2: Providing Notice about Language Assistance to LEP Persons

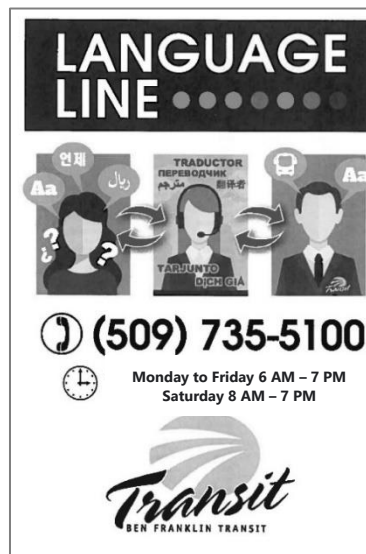
Ben Franklin Transit employs a variety of methods to communicate with customers and the public. These include printed schedule information, signs inside vehicles, transit centers, and park and rides, customer service Language Line, customer service outlets, headquarters reception, [website](#), [Facebook](#) and [Twitter](#), news releases, advertising, community meetings and presentations, and flyers through multiple media outlets.

Figure 5 – Summary of language assistance to LEP persons

- Printed Schedules
- Transit Centers
- Customer Service Outlets
- Language Line
- Media Outlets
- Community Meetings & Presentations
- Social media Platforms

In 2016, Ben Franklin Transit implemented the use of Language Line flyers which are placed on all fixed route services. The Language Line Flyers contain easily recognized symbols and the phone number of BFT's Language Line translation services. The flyers are meant to be distributed by coach operators to any individual that appears to be in need of assistance, but a language barrier exists.

Figure 6 - Language Line Flyer



Language Line flyers provide an expedited way for customers and operators to address language barriers and access translation services

Task #3: Providing Notice of Available Language Services

BFT staff understands the value of assisting the community and is trained on how to direct individuals to a language line, bilingual staff, or to the [BFT website](#) which translates the content to over 100 different languages. Furthermore, anytime public feedback is needed BFT ensures that they inform the public in a timely manner of any major service change or fare change needed. The following methods are utilized to communicate accordingly with the public: through the Tri-City Herald, media releases are sent to local TV and radio stations in English and Spanish, letters are sent to vanpool drivers, information is displayed on [BFT's website](#) and social media accounts, flyers are placed on all fixed route buses, an email is sent to Human Service providers, mailers are shared with schools and agencies such as DSHS, Meals on Wheels, flyers are placed on Dial-A-Ride buses, flyers are posted in shelters at Transit Centers, and at public hearings. To ensure public feedback from LEP populations, BFT also uses local Spanish-language media outlets such as Tú decides, La Voz, and Bustos Media to disseminate information about language services and service/fare changes.

Task #4: Employee Training

BFT trains staff to help minimize barriers when working with individuals that have difficulty speaking English. Staff training include different scenario role play and techniques to assist drivers in understanding how to assist LEP customers. Training refreshers are provided to assist staff to better understand how to interact with individuals that have limited English proficiency. Techniques are provided to assist drivers on how to direct individuals to locate the information they need. Additionally, BFT is in the process of creating a Spanish handbook that will include simple phrases to help staff in their day-to-day interaction with the public. The Spanish handbook will include:

- Language options offered by BFT as part of language assistance
- How to handle a complaint

The following excerpts below was taken from BFT's Operator Training Manual:

3.3.4 LIMITED ENGLISH PROFICIENCY CUSTOMERS

- As BFT operators, it is important to be mindful that not all customers speak English. Situations may arise where non-English speakers may need assistance in understanding how to utilize our various modes of transportation services. In a case where you come in to contact with a customer that needs assistance, but a language barrier exists, please direct them to BFT Customer Service. Customer service staff will either translate information to the customer directly or connect them to a translation service via BFT's Language Line. "Language Line" handouts are located within reach of operators and are meant to be handed to customers when language barriers exist. This handout includes easily recognizable symbols that will be able to direct customers to Customer Service and our Language Line service.
- Providing assistance to non-English speakers is crucial in a service area such as BFT's, because there is a large Spanish-speaking community that utilizes our transit services on a daily basis. Operators are given a Spanish handbook that has simple phrases to help staff interact Spanish-speaking customers. If possible, please use this book to try and communicate with the customer in question. Also, BFT has several Spanish-speaking Customer Service representatives in each department that are valuable resources.
- Please remember to be respectful and patient with all customers, especially those who do not speak English.

Task #5: Monitoring and Updating the LEP Plan

The DOT LEP Guidance suggests that agencies conduct internal monitoring of their system to determine whether language assistance measures and staff training programs are working. BFT continues to work with multilingual staff, community members, and the LEP population to determine if employees are responding appropriately to requests made with limited English or in a language other than English. BFT will consider the implementation of this guidance using available resources such as bilingual staff and ridership surveys.

The Four-Factor Analysis and Language Assistance Plan update is conducted every three (3) years and will include the following:

- Determination of any changes in the LEP population or areas served by Ben Franklin Transit
- Annual number of documented LEP person contacts encountered, where possible
- Annual use of interpretive language services
- How the needs of LEP persons have been addressed
- Determination if the need for services has changed
- Determination if interpretative services have been effective and sufficient to meet the needs
- Determination if complaints have been received concerning Ben Franklin Transit's failure to meet the needs of LEP

Task #6: Targeted Outreach to LEP Populations

The first step to providing effective outreach to LEP populations is identifying how these populations are geographically dispersed throughout BFT's service area. BFT has identified areas where large concentrations of LEP persons live and is committed to providing adequate information when service changes are recommended in areas where these LEP populations live.

Conclusion

Overall, BFT is being proactive and responsive in ensuring that the LEP community and that non-English speaking individuals are given the opportunity to be heard. BFT will continue to identify and quickly remedy any problems it encounters. Outreach efforts will continue to flourish to ensure that the community is made aware of any future programs available. BFT will also continue to seek educational programs to improve staff knowledge base on how to better assist LEP persons.

The Language Assistance Plan was released for public review on June 2. Public comment was welcomed during two different public meetings. Only one member of the public attended. Their comments suggested that BFT should coordinate with school districts for its Title VI and Language Assistance survey efforts. To date, no further comments have been received but BFT will accept public comments until July 2. A final public hearing will be held during the BFT Board of Directors meeting on July 14.

APPENDIX C

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

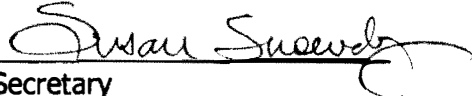
WHEREAS, THE PLANNING/MARKETING COMMITTEE OF THE BOARD has reviewed the proposed attached Schedule (A) – Title VI Policy Regarding Service Changes and Fare Increases. Public hearings were held on March 11, 2013 and comments were taken for over 30 days.

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 D

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

APPENDIX E

Ben Franklin Transit

January 2020 Title VI Service Equity Analysis

Route 268 Implementation

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 us at (509) 734-5107.

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APPENDICES

- APPENDIX A - Resolution 15-13 – Establishing Title VI Policies**
- APPENDIX B - Resolution 26-14 – Establishing Title VI Policies Update**
- APPENDIX C - PUBLIC HEARING OVERVIEW – March 2020 Service Change Recommendations**

Executive Summary

Per the stipulations outlined in Federal Transit Administration (FTA) Circular 4702.1B §4, Chap.4-10, Ben Franklin Transit (BFT) will prepare a Title VI service equity analyses, where applicable, of all major service and fare changes using current FTA guidance. This documentation will be submitted to FTA as well as kept on file at BFT. The analysis will evaluate the proposed changes and their impacts on minority and low-income populations within the BFT service area, including discussion of outreach and public involvement strategies and activities used to involve and inform minority, low-income, and limited English-speaking populations throughout the decision-making process.

In January 2020, BFT Planning staff will recommend service changes to extended Route 68 to Knight St Transit Center and designate the route as “Route 268”. Route 268 is planned to be implemented in March 2020, and together with the existing Route 225, will provide 15-minute service between 22nd Ave Transit Center (Pasco) and Knight St Transit Center (Richland). Level of service will also be increased at area’s that have historically generated high ridership such as Winco (Richland), Broadmoor & Chapel Hill, Columbia Basin College and 20th Ave (Pasco). Route 268 is planned to operate Monday through Friday, from approximately 6:00 AM to 8:00 PM. Due to a decrease in demand, Route 268 is not planned to operate as late as other BFT fixed routes and will not operate on Saturdays.

If approved, the implementation of Route 268 will qualify as a major service change per BFT’s Major Service Change Policy. BFT defines a major service change as “any change in service on any individual route that would add or eliminate more than 20% of the route revenue miles or route revenue hours”. The January 2019 Title VI Service Equity Analysis details how recommended service changes related with the implementation of Route 268 will affect low-income and minority populations, relative to non-minority populations, and any adverse effects that may be occur.

Upon further analysis it was concluded that implementation of the Route 268 would not result in a disparate impact (adverse effect on minority populations) or disproportionate burden (adverse effects on low-income populations). For additional clarification and detail as to how BFT operates its programs without regard to race, color, national origin please refer to BFT’s 2019 Title VI Program and Language Assistance Plan, which can be found at <https://www.bft.org/civil-rights/>.

BFT Major Service Change Policies

Title VI service and fare equity analyses will be conducted when proposed service changes constitute a major service and exceed the quantitative threshold outlined in BFT's Major Service Change, Disproportionate Burden and Discriminatory Impact policies, which were adopted by BFT Board of Directors via Resolution 15-2013 (Appendix A). Additional changes to the Disproportionate Burden and Discriminatory Impact Policy were made via BFT Board of Directors' adoption of Resolution 26-2014 (Appendix B). These policies are detailed below:

Major Service Change Policy

A major service change is defined as any change in service on any individual route that would add or eliminate more than 20% of the route revenue miles or route 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, route segment elimination, re-routing, or route elimination.

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 disproportionately affects low-income populations.

If the impact of a major service change proposal or any fare change proposal requires a low-income population to receive benefits 20% less or to bear adverse effects 20% more than those benefits or adverse effects received or borne by the non-minority population, that impact will be considered a disproportionate burden.

Disproportionate burden on routes with either span of service changes and/or frequency changes will be determined by analyzing all routes with such changes together. Disproportionate burden on routes with segment elimination, re-routing, or route elimination will be determined on a route by route basis.

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 disproportionately affects members of a group identified by race, color, or national origin.

If the impact of a major service change proposal or any fare change proposal requires a minority population to receive benefits 20% less or to bear adverse effects 20% more than those benefits or adverse effects received or borne by the non-minority population, that impact will be considered a disparate impact.

Service Area Demographic Overview

BFT provides public transportation services across a 616-square mile Public Transit Benefit Area (PTBA) within Benton and Franklin counties, located in Washington State. The PTBA includes the municipalities of Kennewick, Pasco, Richland, West Richland, Benton City, Prosser and pockets of unincorporated areas in Benton and Franklin County. BFT's operation is accounted for under a single enterprise fund, which uses the same accrual accounting method as private enterprise. BFT has no sub-recipients and does not pass FTA funds through to sub-recipients.

The estimated population of BFT's PTBA is 260,587 as of 2018 (Washington State Office of Financial Management) while Benton and Franklin counties have a combined estimated population of BFT 271,122 (2012-2016 American Community Survey 5-Year Estimates). BFT's PTBA and surrounding areas consist of a diverse population of which 37.6% identify as a minority and 14.7% of the population has household income at or below the federal poverty line (Figures 1 & 2).

Figure 1- Public Transit Benefit Area Minority Population Percentage

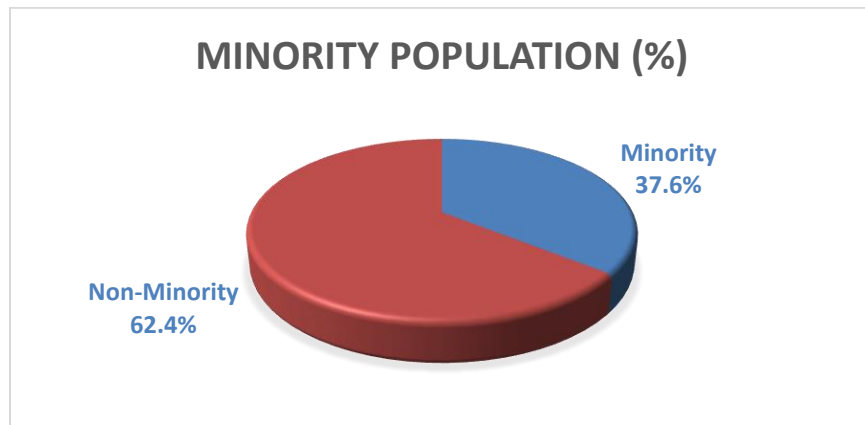
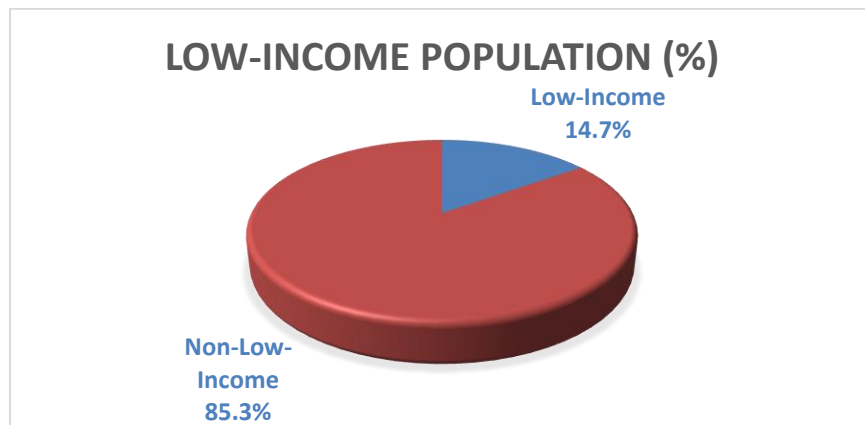
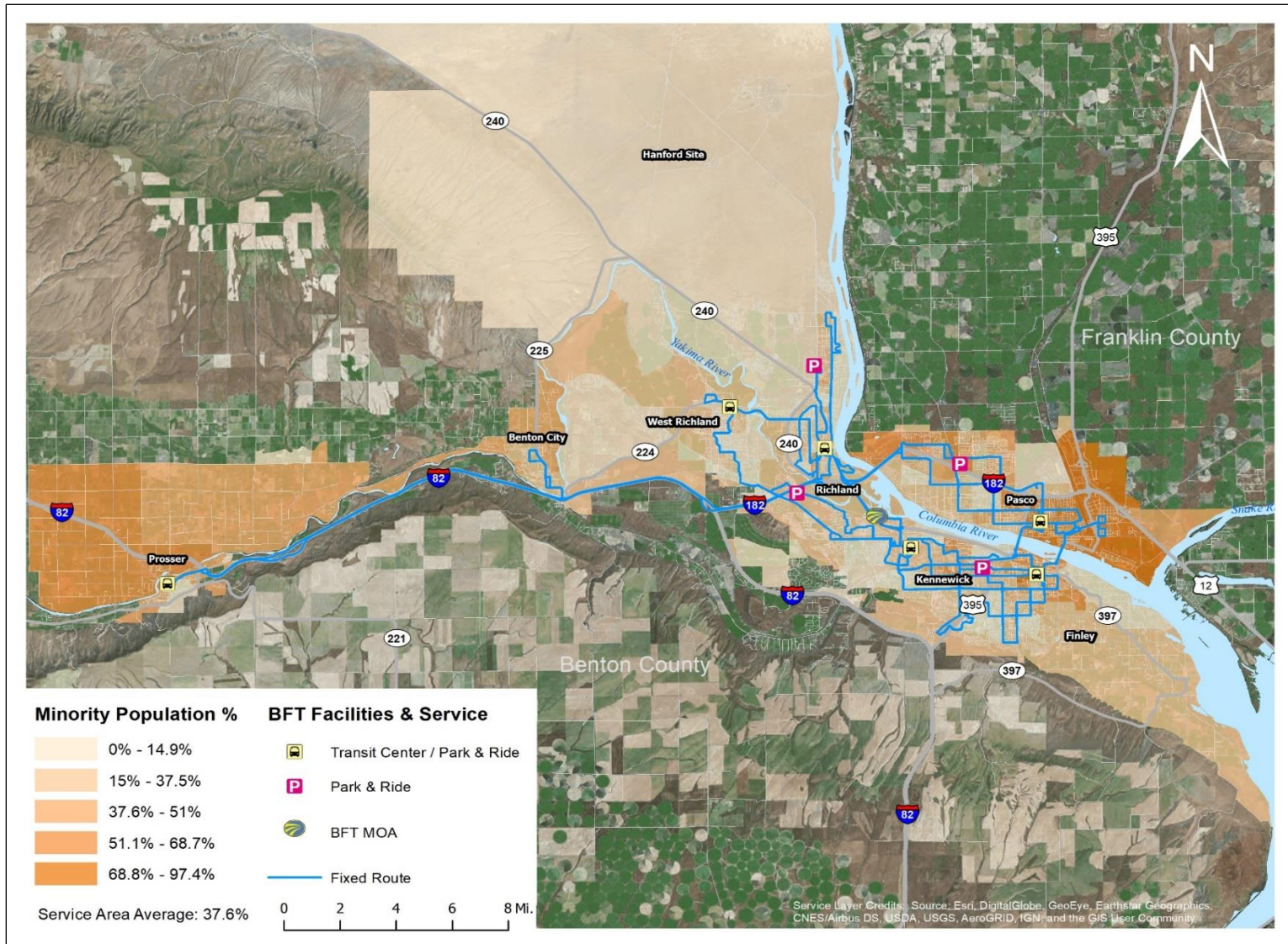


Figure 2- Public Transit Benefit Area Low-Income Population Percentage



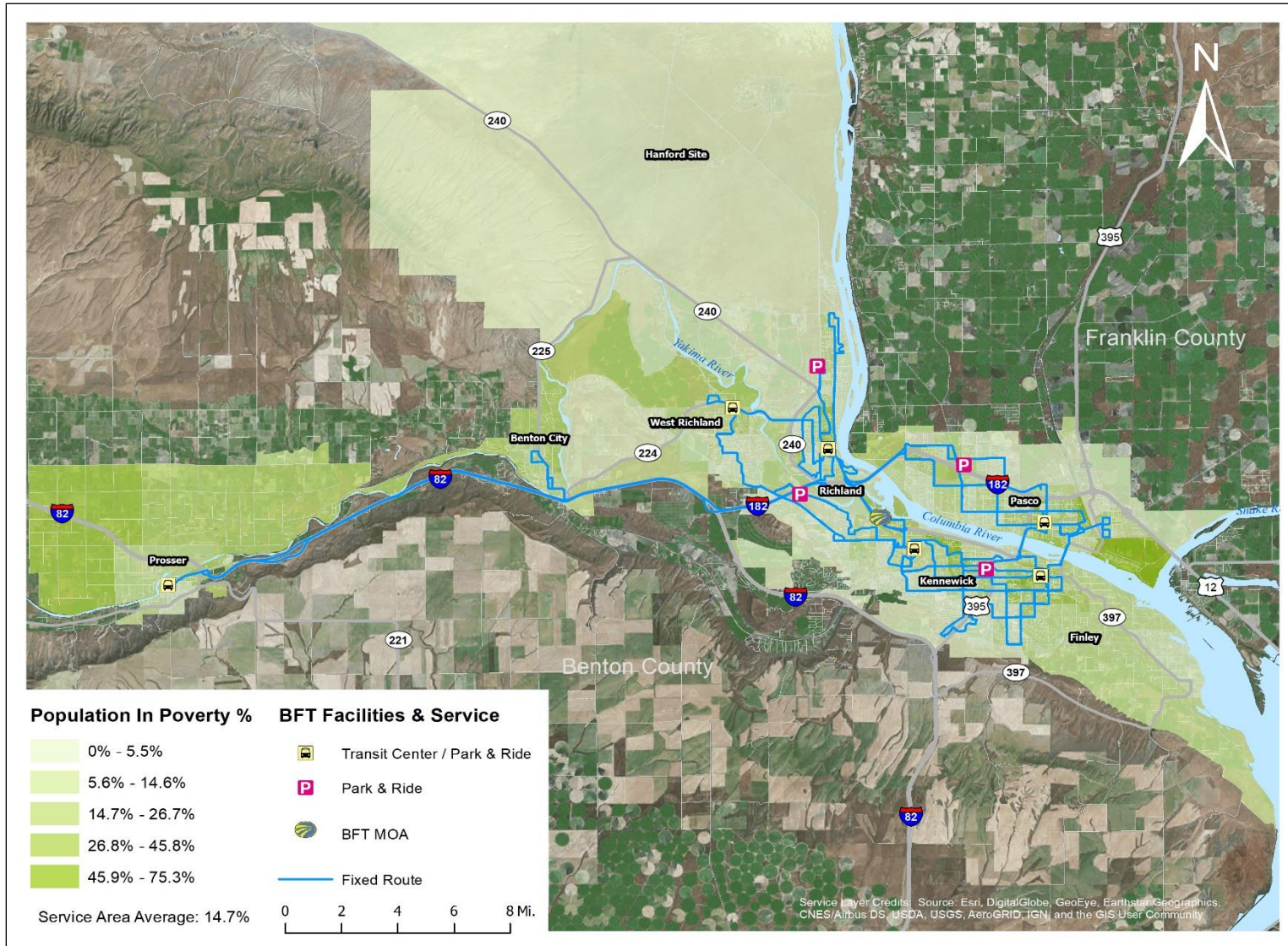
Source: U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates

Map 1 - BFT PTBA Minority Population Percentage by Block Group



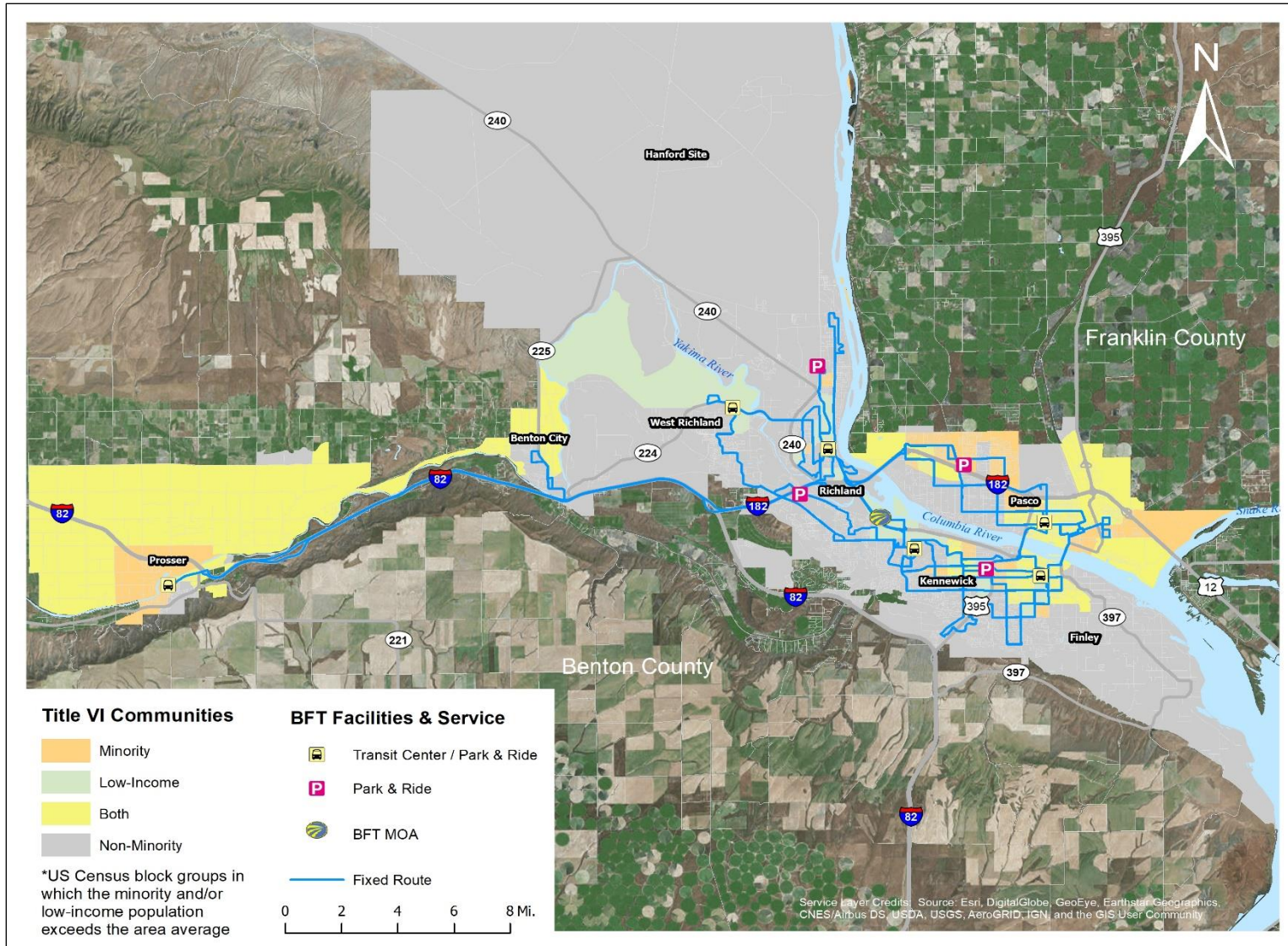
Source: U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates

Map 2 - BFT PTBA Low-Income Population Percentage by Block Group



Source: U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates

Map 3 - BFT PTBA Block Groups with Minority & Low-Income Populations Exceeding Area Average



Source: U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimate

Proposed Route 268 Implementation Service Change Overview (March 2020)

In July 2019, BFT's Board of Directors approved the implementation of Route 68 by way of Resolution 51-2019. Route 68 was a product of a demonstration route that's purpose was to provide more frequent connections between 22nd Ave Transit Center and West Pasco. The preliminary concepts for Route 68 were developed as a reaction to multiple community requests for more frequent service between 22nd Ave Transit Center, Columbia Basin College, and Chiawana High School. A finalized service plan for Route 68 was developed and presented to BFT's Board of Directors following an extensive public involvement process that included multiple open houses and additional outreach efforts.

Following the implementation of Route 68 in Fall 2019, issues with congestion in the areas adjacent to Chiawana High School were identified as having negative impacts on the ability of Route 68 to stay on schedule, prompting BFT's Service Development department to look into options to resolve the observed issues. After further analysis of service data and input gathered from operators, BFT staff concluded that the best option is to extend Route 68 and designate the route as "Route 268" to provide an off-pulse option between 22nd Ave Transit Center and Knight St Transit Center.

Route 268 is planned to be implemented in March 2020, and together with the existing Route 225, will provide 15-minute service between 22nd Ave Transit Center (Pasco) and Knight St Transit Center (Richland). Level of service will also be increased in areas that have historically generated high ridership such as Columbia Point (Richland), Broadmoor & Chapel Hill (Pasco), Columbia Basin College and 20th Ave (Pasco). Route 268 is planned to operate Monday through Friday, from approximately 6:00 AM to 8:00 PM. Due to a decrease in demand, Route 268 is not planned to operate as late as other BFT fixed routes and will not operate on Saturdays.

This change would address operational issues with the current Route 68 and result in increased frequency between Knight St Transit Center and 22nd Ave Transit Center and would continue to provide 30-minute service in the areas adjacent to Chiawana High School and the Chapel Hill area during the weekday. Implementation of Route 268 would also be another step forward towards BFT's long term plan to create a high-frequency transit network. BFT's 2017 Comprehensive Service Plan (CSP) details a long-term plan to establish a high-frequency network that would provide 15-minute or better frequency between all of BFT's major transit centers. Currently, frequent service exists between Richland and Kennewick via the 120/126 and Kennewick and Pasco via the 150/160, but no such frequent exists between Richland and Pasco. When implemented, Route 268, together with Route 225, will make it possible to catch a bus every 15 minutes between Richland and Pasco.

Recommended Route 268 Service Change Profile

- Route 268
 - Extended version of Route 68
 - Established 15-minute service between Knight St Transit Center and 22nd Ave Transit Center during the majority of weekday service
 - Establishes more frequent service adjacent to Columbia Point, Columbia Basin College and 20th Ave (Pasco)
 - Increases frequencies on the majority of Rd 84 and Chapel Hill Blvd
 - Removes direct fixed route service to portions of Argent Rd and Rd 100 in West Pasco
 - Addition of approximately 5,000 revenue hours
 - Addition of approximately 80,000 permanent revenue miles
 - Approximately 45% change in coverage area
- Implementation planned for March 9th, 2019
- Demographic Breakdown:

| | <u>Current Routes 68</u> | <u>Recommended Route 268</u> |
|-------------|--------------------------|------------------------------|
| Total: | 10,614 | 10,439 |
| Minority: | 5,273 (49.7%) | 5,306 (50.8%) |
| Low-Income: | 1,775 (16.7%) | 1,834 (17.6%) |

Route 268 Recommended Frequency, Service Span, & Routing

Text in red indicates a change in hours of service or frequency

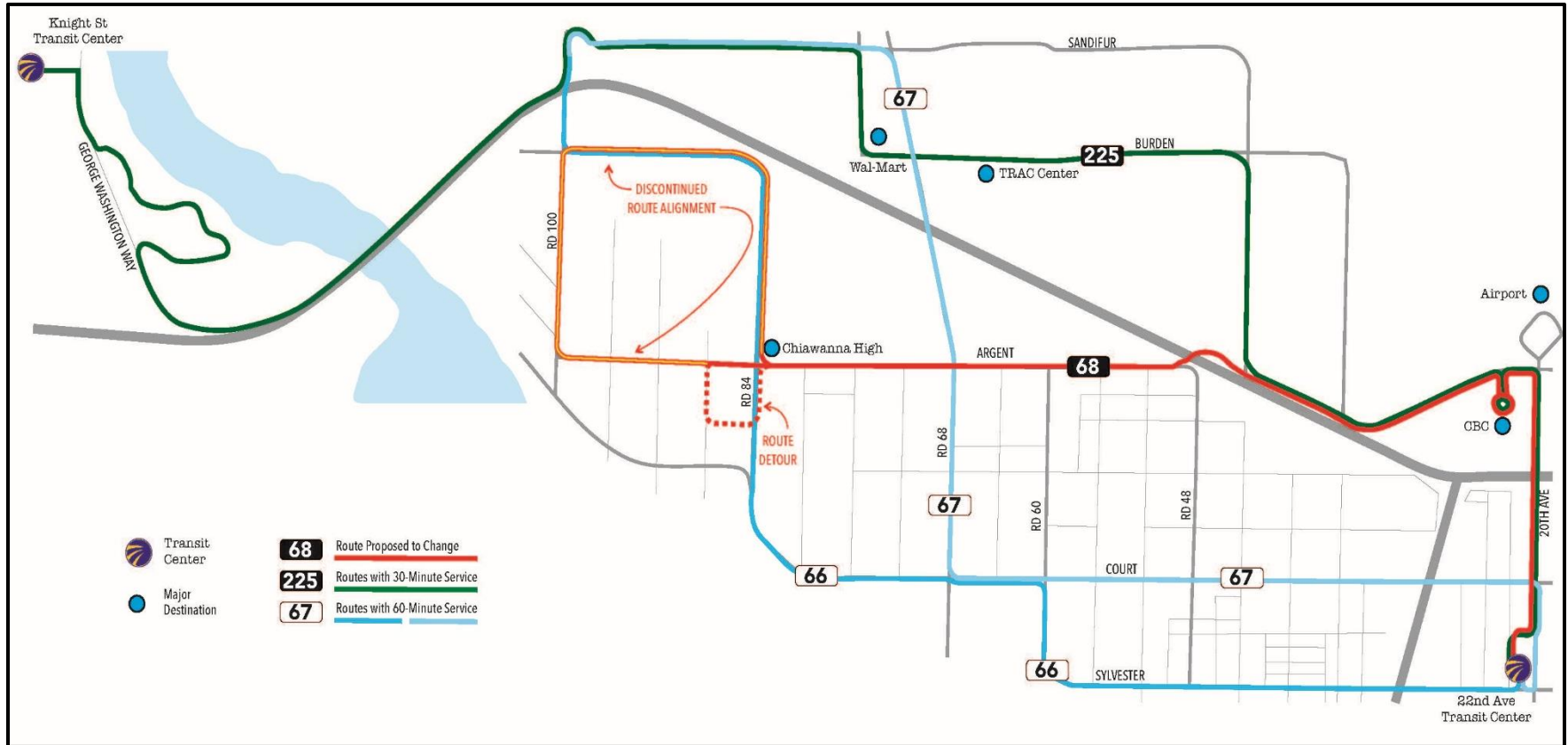
Table 1 - Route 68/268 Frequency Changes

| | Weekdays | | Saturdays | |
|------------------------------|-------------|--------------|-------------|--------------|
| | 6 AM – 8 PM | 8 PM – 10 PM | 7 AM – 7 PM | 7 PM – 10 PM |
| Current Route 68 | 30 | No service | No service | No service |
| Recommended Route 268 | 30 | No service | No service | No service |

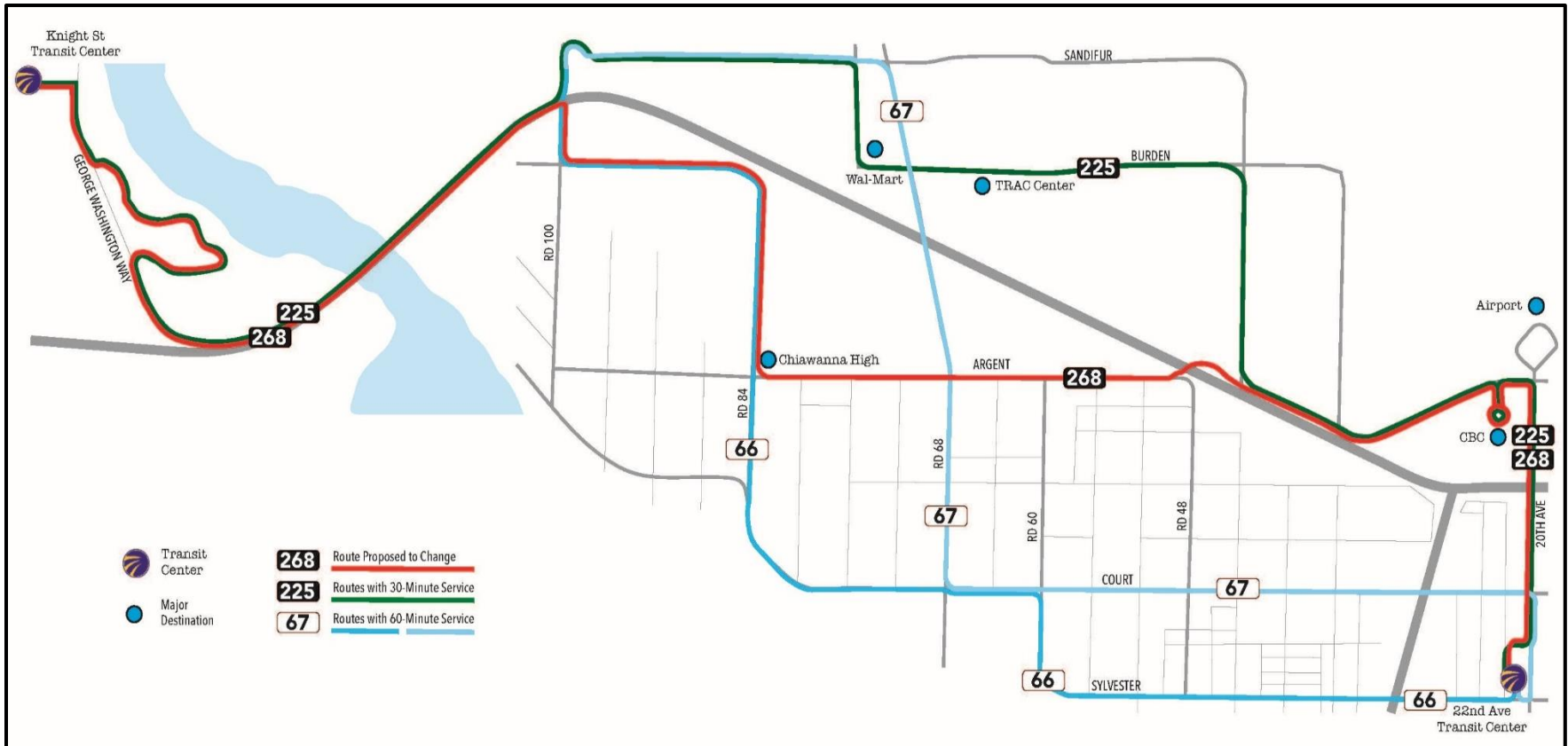
Table 2 - Route 68/268 Service Span Changes (approximate time)

| | Weekday | Saturday |
|------------------------------|--------------------------|------------|
| Current Route 68 | 6:15 AM – 8:30 PM | No service |
| Recommended Route 268 | 6:00 AM – 8:00 PM | No service |

Map 4 – Current Route 68 & Adjacent Fixed Routes (Winter 2019/20)



Map 5 - Recommended Route 268 & Adjacent Fixed Routes (March 2020)



January 2020 Title VI Service Equity Analysis Results

This section details results from a service equity analysis conducted for the planned implementation of Route 268, which is essentially an extended version of the current Route 68. This recommended service changes will constitute as a major service change per BFT's Major Service Change Policy if implemented, thus a service equity analysis is required.

BFT conducts service equity analyses in order to prevent adverse effects, disparate impact, disproportionate burdens and unfair treatment of minority and low-income populations in BFT's service area. Specifically, BFT staff are required to "valuates significant system-wide service and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact." This service equity analysis was conducted by BFT staff to evaluate proposed service changes, which do not include any fare changes, in compliance with FTA Circular 4702.1B §4, Chap.4-10.

Equity Analysis Methodology

BFT staff utilized Remix to conduct this service equity analysis. Remix has the capability to automatically generate a Title VI report (2012-2016 American Community Survey data) by comparing existing fixed routes to the proposed changes. Remix implements the following methodology to provide accurate service equity analysis data:

1. Calculate low-income and minority population within 1/4 mile of current and proposed fixed route
 - For each route, build a shape that represents the area within quarter mile of any of its route alignment
 - Intersect the catchment area with 2012-2016 ACS Census data. Get a list of block groups and the percentage overlap with each.
 - For each block group, take the percentage of overlap and multiply it by the block group's statistics
2. Compare the number of people-trips, before and after
 - Multiply the population near a route times the number of trips it makes (per year) to get "people-trips"
 - Repeat for low-income and minority populations to get "low-income people-trips" and "minority people-trips"
 - Compare these numbers between the current and the proposed versions of the route, to get a set of people-trip differences. Remix compares current routes to proposed routes that have the same name.
3. Get the total difference in people-trips across the transit system
 - Repeat the process above for every route in the transit system
 - Sum the difference in people-trips. This will return three numbers: total difference in people-trips, total difference in low-income people-trips, and total difference in minority people-trips.
4. Calculate the change borne by low-income and minority populations
 - Divide the total difference in low-income people-trips by the total difference in people-trips to get the percentage of change borne by those with low-income
 - Repeat for minority people-trips
5. Compare the percentage change to the average in the service area
 - Calculate the average percentage of low-income and minority populations across the entire service area
 - Subtract from the change borne by those populations
 - Get two final numbers: the difference between the impact this set of transit changes had on low-income and minority populations compared to any average change

Route 268 Implementation Service Equity Analysis

Recommended service changes to incorporate Route 68 into a new route, which will be designated as Route 268, will qualify as a major service change per BFT’s Major Service Change Policy due to the substantial change in the route’s coverage area, revenue hours, and revenue miles. As such, a service equity analysis was conducted to determine if the plan to incorporate current Route 68 into the new Route 268 will result in a disparate impact and/or disproportionate burden on the minority and low-income populations.

Disparate Impact Analysis

If the impact of a major service change proposal requires a minority population to receive benefits 20% less or to bear adverse effects 20% more than those benefits or adverse effects received or borne by the non-minority population, that impact will be considered a disparate impact per BFT’s Disparate Impact Policy.

Minority populations will experience 57.7% of the effects of the planned implementation of Route 268. This is 20.1% above the area average. Changes borne by minority populations does exceed the area average by more than 20%, but no potential disparate impact is expected due to the fact that Route 268 will actually increase service to minority populations.

Disproportionate Burden Analysis

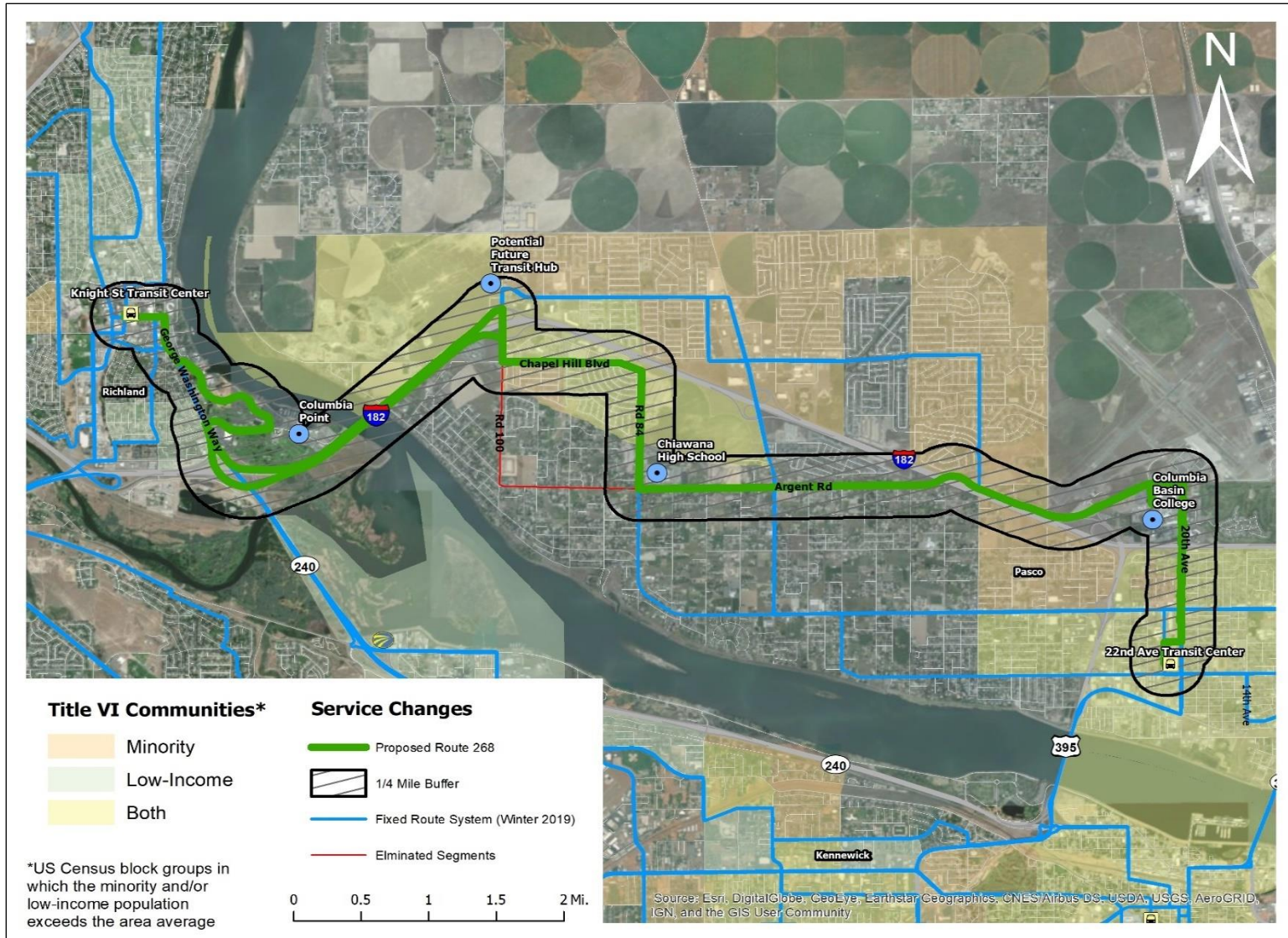
If the impact of a major service change proposal or any fare change proposal requires a low-income population to receive benefits 20% less or to bear adverse effects 20% more than those benefits or adverse effects received or borne by the non-minority population, that impact will be considered a disproportionate burden.

Low-income populations will experience 23.5% of the effects of the planned implementation of Route 268. This is 8.8% above the area average. Changes borne by low-income populations will not exceed the area average by more than 20%, meaning there will be no potential disproportionate burden. Regardless, the planned changes will result in an increase of service to low-income populations.

Table 3 - Route 268 Service Change Data

| Baseline Fixed Route System | | | | Proposed Service Change | | | | Service Change Impact Breakdown (People-Trips Difference) | | | | |
|-----------------------------|------------|----------|--------------|----------------------------|------------|----------|--------------|---|------------|--------------|---------------------|--------------|
| Population (1/4 mi) | | | | Population (1/4 mi) | | | | Additional People-Trips | | | Change Borne | |
| Total | Low-Income | Minority | Annual Trips | Total | Low-Income | Minority | Annual Trips | Total | Low-Income | Minority | Low-Income | Minorities |
| 10,614 | 16.7% | 49.7% | 7,140 | 10,439 | 17.6% | 50.8% | 14,280 | 36,678,180 | 8,608,203 | 21,177,240 | 23.5% | 57.7% |
| | | | | | | | | | | Area Average | 14.7% | 37.6% |
| | | | | | | | | | | Delta | 8.8% | 20.1% |

Map 6 - Route 268 Implementation Service Change Impacts



Source: U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimate

Service Equity Analysis Summary

Based on the service equity analysis results pertaining to the implementation of Route 268, BFT staff have concluded that there will be no disparate impact or disproportionate burden if these planned service changes are implemented. This conclusion means that there will be no apparent adverse effects on minority or low-income populations caused with the planned service changes. In fact, if implemented, Route 268 will result in a net gain of service to low-income and minority populations and will benefit all those who utilize BFT's fixed route system to travel between Richland and Pasco.

The only areas that would be negatively impacted by the planned implementation of Route 268 would be those who live in the residential areas adjacent to the western reaches of Argent Rd and the southern reaches of Rd 100. The populations that reside in these areas are well below the BFT's PTBA averages regarding low-income and minority populations. As such, there isn't expected to be adverse impacts on Title VI populations. Furthermore, the area that will no longer be served directly by fixed route currently produces little ridership. All five stops in this area has less than 5 boardings per weekday on average.

Table 4 - Disparate Impact & Disproportionate Burden Determination

| Service Changes | Date Effective | Disparate Impact | Disproportionate Burden |
|---------------------------------|------------------------------|------------------|-------------------------|
| Route 268 Implementation | March 9 th , 2020 | No | No |

Public Outreach

UPDATED SECTION INCLUDED AFTER PUBLIC OUTREACH PROCESS IS COMPLETE

Ben Franklin Transit

2021 Annual Service Plan Title VI Service Equity Analysis

Frequent Service Corridor & Sunday Service Implementation

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 us at (509) 734-5107.

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APPENDICES

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Executive Summary

As required by Federal Transit Administration (FTA) Circular 4702.1B §4, Chap.4-10, Ben Franklin Transit (BFT) must prepare a Title VI service equity analyses, where applicable, of all major service and fare changes using current FTA guidance. This documentation will be submitted to FTA and kept on file at BFT. A Title VI service equity analysis evaluates proposed changes and their impacts on minority and low-income populations within the BFT service area, including discussion of outreach and public involvement strategies and activities used to involve and inform minority, low-income, and limited English proficiency (LEP) populations throughout the decision-making process.

At this time, BFT staff is proposing fixed route service changes that would create a Frequent Service Corridor (FSC) providing 15-minute or better service between transit centers and main commercial corridors with new routes 1 and 3 and a future route 2. The new routes are combinations of the current routes 120, 126, 150, and 160 (and future consolidation of routes 225 and 268). Implementation of the FSCs will also require modest changes to BFT's local fixed route network to maintain service coverage and connectivity. BFT is proposing the implementation of routes 20 and 26, both of which are truncated versions of the current routes 120 and 126 to maintain coverage beyond the new route 1 alignment. BFT is also proposing implementation of a new route 40 to maintain service on a portion of the existing route 16 and add new service to some of the mostly densely populated moderate-income areas of Kennewick. Frequencies on routes 42 and 47's frequencies will be increased from 60 minutes to 30 minutes on Saturdays from 7 AM to 8 PM. These changes, if approved, will be made in June 2021.

Additionally, BFT staff is proposing the implementation of fixed route and complementary ADA Dial-A-Ride services on Sundays. BFT currently does not provide any fixed route service on Sunday, and this proposal will result in a significant increase in service and administrative support. Sunday service will consist of the six routes operating every 30 minutes, supplemented by CONNECT, BFT's on-demand, first-mile/last-mile service to maintain coverage throughout the Tri Cities portion of BFT's service area. Routes 1, 3, 123 (shortened), 225, 42, and 64 will operate BFT's Sunday network. Route 123 will not provide service to the Stevens Center employment center located at the northern terminus, since this is a weekday commuter destination. The Sunday network is proposed to operate from 8:00 a.m. to 6:30 p.m.

If approved, most of the proposed service changes outlined above will qualify as a major service change per BFT's Major Service Change Policy. Saturday frequency improvements on routes 42 and 47 and the Route 110 daily schedule adjustment do not meet BFT's definition of a major service change. BFT defines a major service change as "any change in service on any individual route that would add or eliminate more than 20% of the route revenue miles or route revenue hours."

Upon further analysis it was concluded that implementation of FSC routes, the proposed local route changes, and the addition of fixed route service on Sundays would not result in a disparate impact (adverse effect on minority populations) or disproportionate burden (adverse effects on low-income populations). For additional clarification and detail as to how BFT operates its programs without regard to race, color, national origin please refer to BFT's 2019 Title VI Program and Language Assistance Plan, which can be found at <https://www.bft.org/civil-rights/>.

BFT Major Service Change Policies

Title VI service and fare equity analyses will be conducted when proposed service changes constitute a major service and exceed the quantitative threshold outlined in BFT's Major Service Change, Disproportionate Burden and Discriminatory Impact policies, which were adopted by BFT Board of Directors via Resolution 15-2013 (Appendix A). Additional changes to the Disproportionate Burden and Discriminatory Impact Policy were made via BFT Board of Directors' adoption of Resolution 26-2014 (Appendix B). These policies are detailed below:

Major Service Change Policy

A major service change is defined as any change in service on any individual route that would add or eliminate more than 20% of the route revenue miles or route 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, route segment elimination, re-routing, or route elimination.

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 disproportionately affects low-income populations.

If the impact of a major service change proposal or any fare change proposal requires a low-income population to receive benefits 20% less or to bear adverse effects 20% more than those benefits or adverse effects received or borne by the non-minority population, that impact will be considered a disproportionate burden.

Disproportionate burden on routes with either span of service changes and/or frequency changes will be determined by analyzing all routes with such changes together. Disproportionate burden on routes with segment elimination, re-routing, or route elimination will be determined on a route by route basis.

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 disproportionately affects members of a group identified by race, color, or national origin.

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Service Area Demographic Overview

BFT provides public transportation services across a 616-square mile Public Transit Benefit Area (PTBA) within Benton and Franklin counties, located in Washington State. The PTBA includes the municipalities of Kennewick, Pasco, Richland, West Richland, Benton City, Prosser and pockets of unincorporated areas in Benton and Franklin County. BFT's operation is accounted for under a single enterprise fund, which uses the same accrual accounting method as private enterprise. BFT has no sub-recipients and does not pass FTA funds through to sub-recipients.

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Figure 1- Public Transit Benefit Area Minority Population Percentage

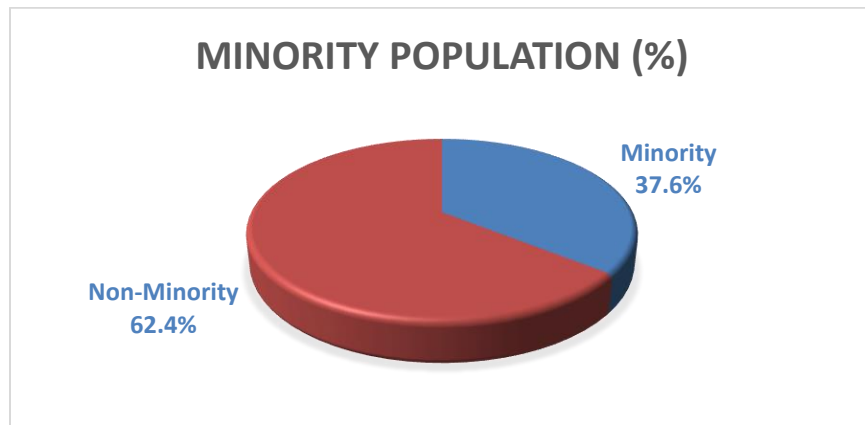
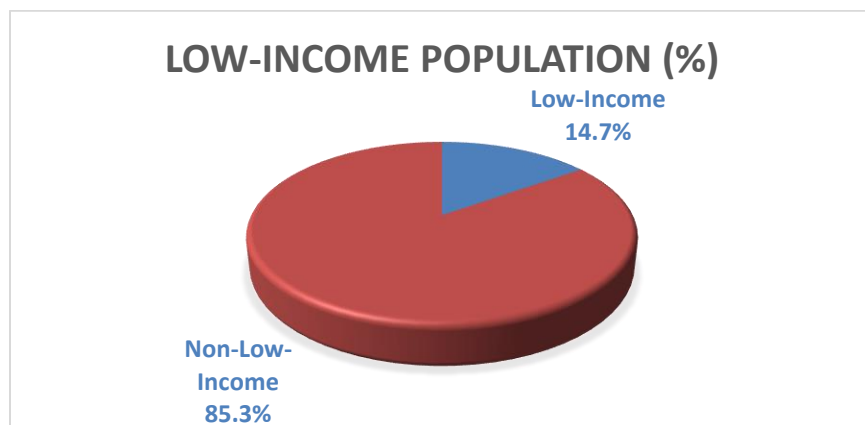
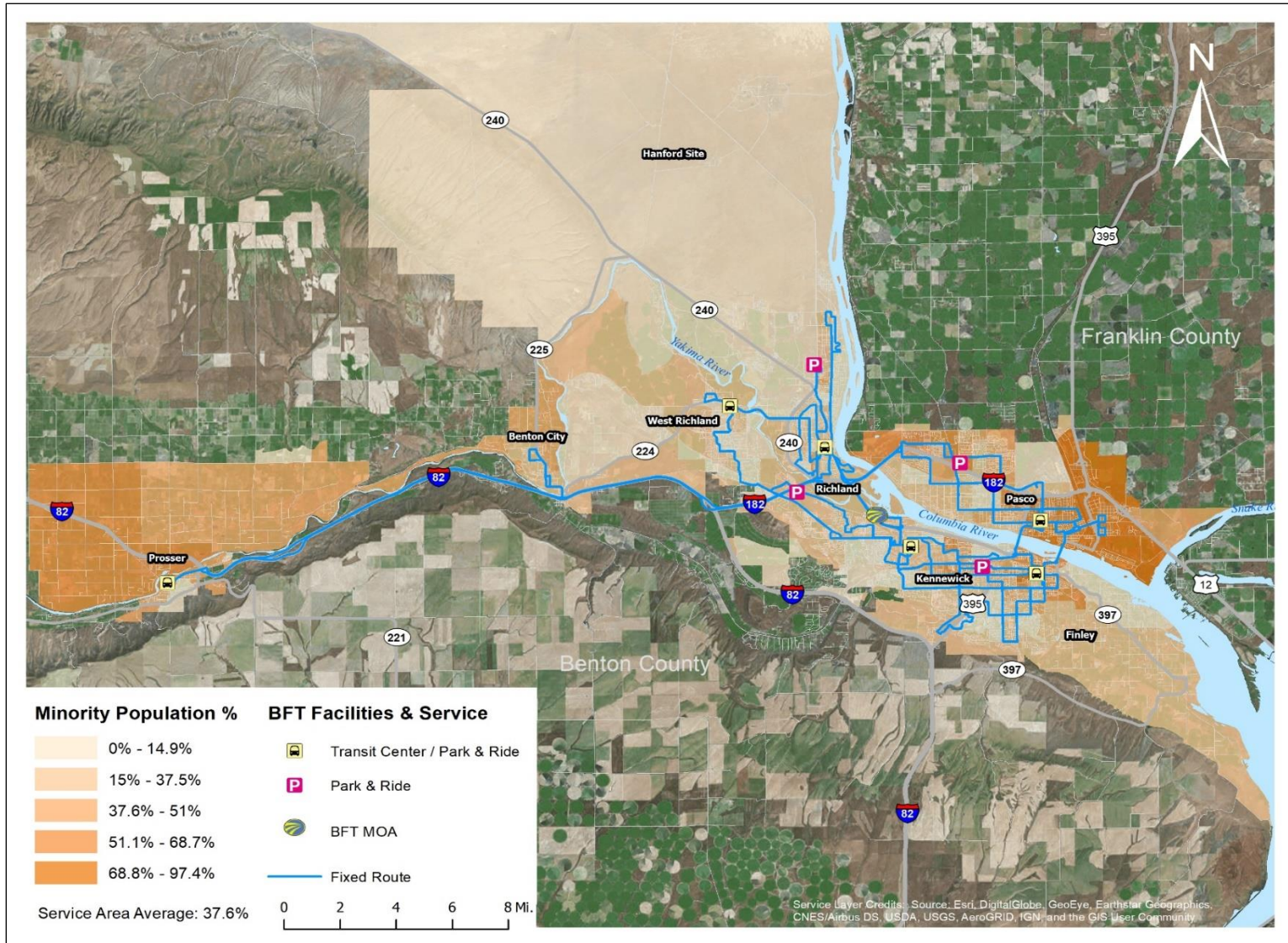


Figure 2- Public Transit Benefit Area Low-Income Population Percentage



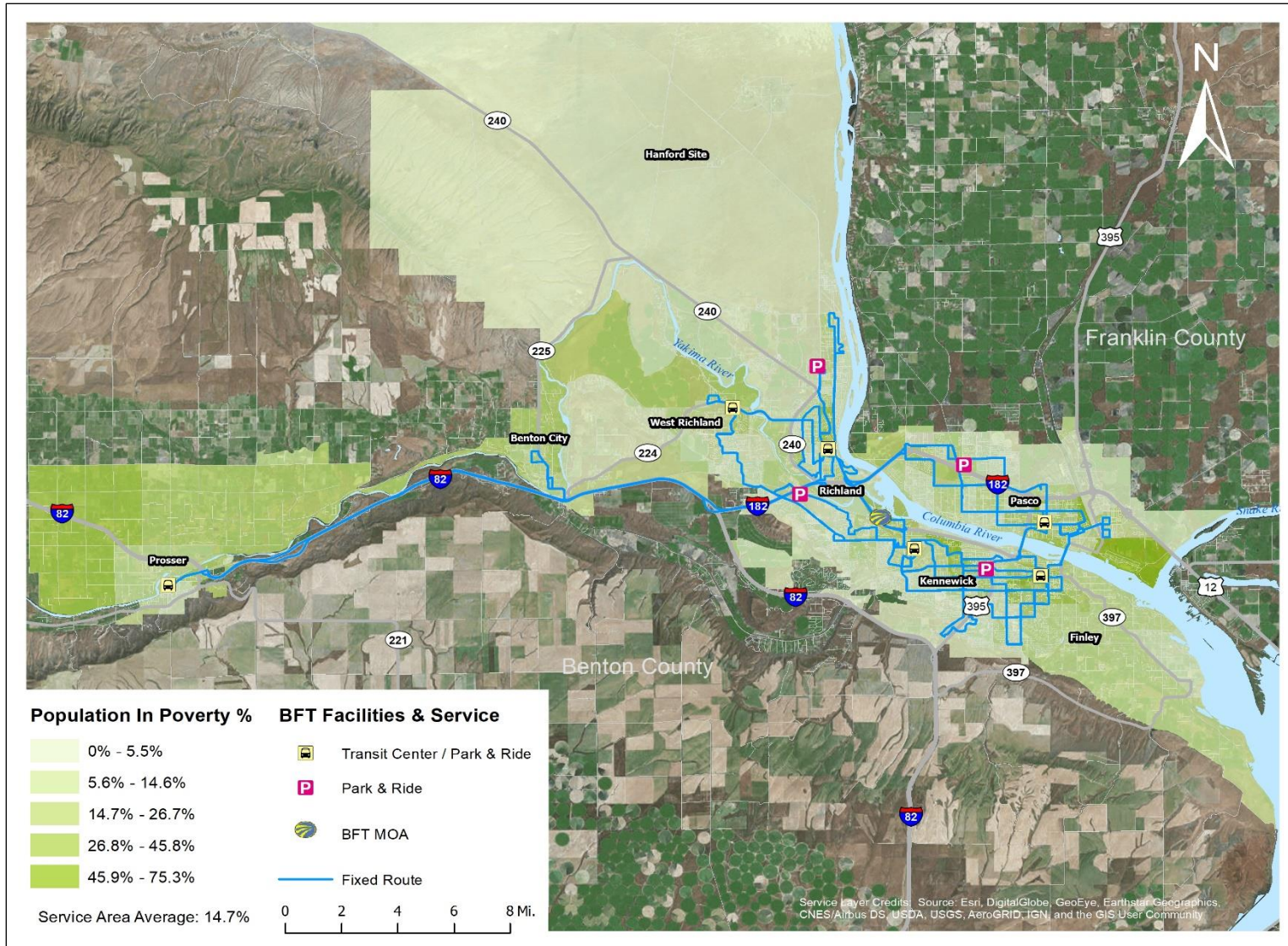
Source: U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates

Map 1 - BFT PTBA Minority Population Percentage by Block Group



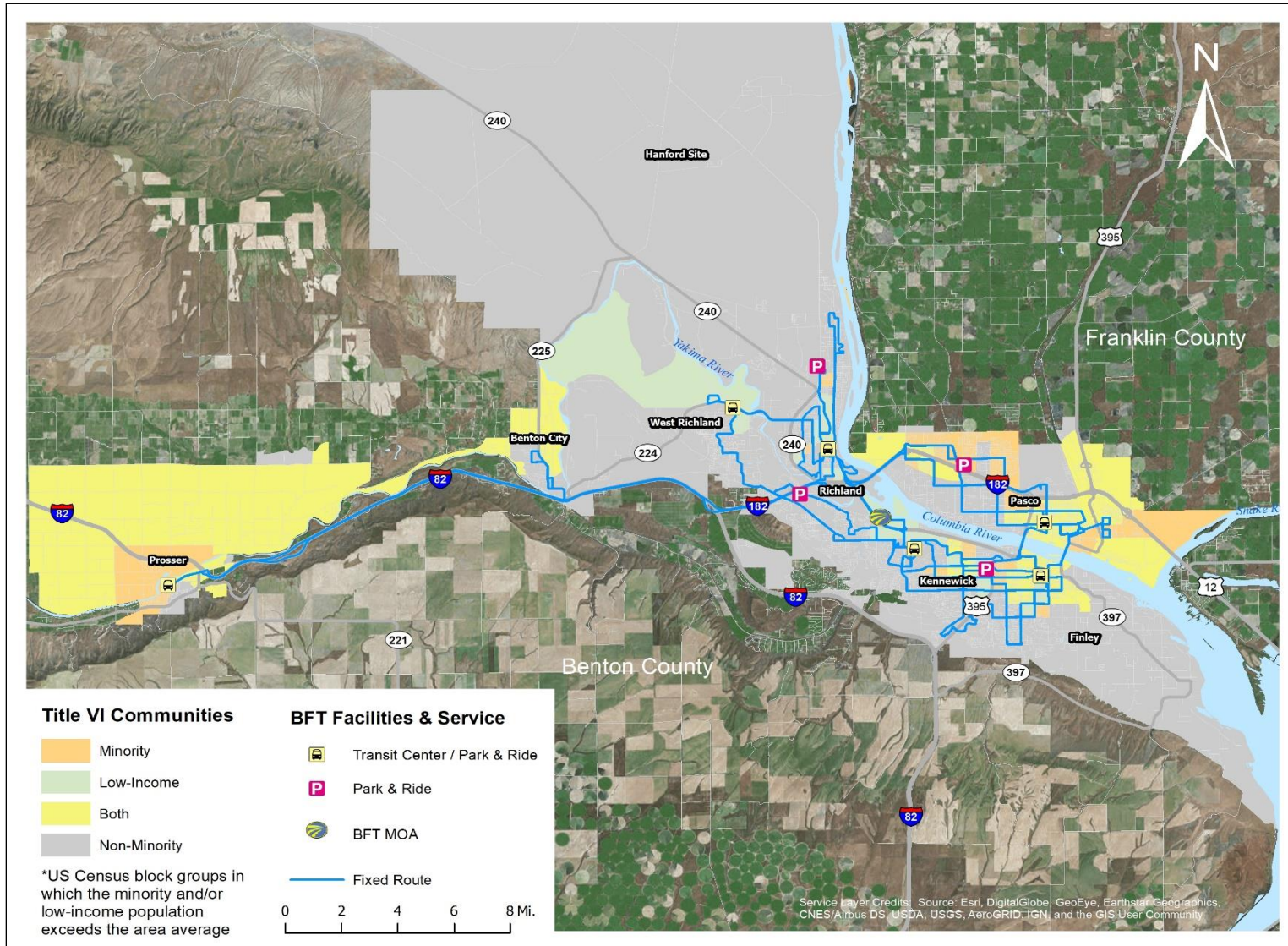
Source: U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates

Map 2 - BFT PTBA Low-Income Population Percentage by Block Group



Source: U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates

Map 3 - BFT PTBA Block Groups with Minority & Low-Income Populations Exceeding Area Average



Source: U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimate

Major Service Changes (June 2021)

Recommended Route 1 Service Change Profile

- FSC route
 - Combination of segments of routes 120,126,150, and 160
 - Established true 15-minute service between Knight St Transit Center and Three Rivers Transit Center and 22nd Ave Transit Center during the majority of weekday and Saturday service
 - Reduces layover time at mid-route transit centers (e.g., Three Rivers Transit Center)
 - 6 vehicles needed to operate
- Implementation planned for June 2021
- Reduced frequency Sunday service planned for August 2021
- Demographic Breakdown:

| Recommended Route 1 | |
|----------------------------|--------|
| Total: | 18,795 |
| Minority %: | 46.8% |
| Low-Income%: | 24.0% |

Route 1 Recommended Frequency, Service Span, & Routing

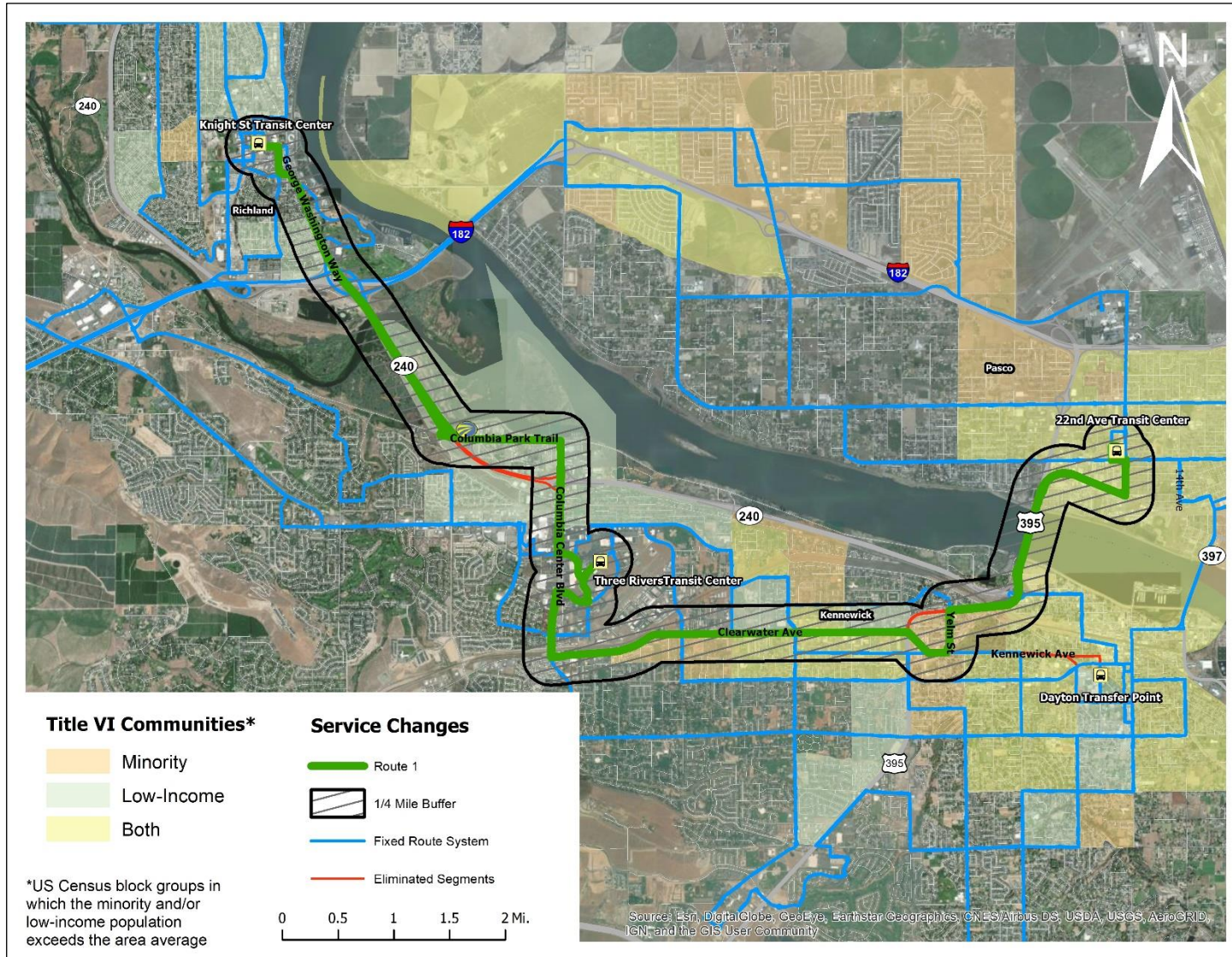
Table 1 - Route 1 Frequency

| | Weekdays | | Saturdays | |
|----------------------------|-------------|--------------|-------------|--------------|
| | 6 AM – 8 PM | 8 PM – 10 PM | 7 AM – 7 PM | 7 PM – 10 PM |
| Recommended Route 1 | 15 | 15 | 15 | 15 |

Table 2 - Route 1 Service Span Changes (approximate time)

| | Weekday | Saturday |
|----------------------------|---------------------------|---------------------------|
| Recommended Route 1 | 6:00 AM – 10:00 PM | 7:00 AM – 10:00 PM |

Map 4 – Route 1 Implementation Service Change Impacts



Recommended Route 3 Service Change Profile

- Route 3
 - FSC route
 - Adheres to same route alignment and schedule as current route 150 and 160 between 22nd Ave Transit Center and Dayton St Transfer Point
 - Established true 15-minute 22nd Ave Transit Center and Dayton St Transfer Point during the majority of weekday and Saturday service
 - 4 vehicles needed to operate
- Implementation planned for June 2021
- Reduced frequency Sunday service planned for August 2021
- Demographic Breakdown:

Recommended Route 3

| | |
|--------------|--------|
| Total: | 12,366 |
| Minority %: | 78.4% |
| Low-Income%: | 27.4% |

Route 3 Recommended Frequency, Service Span, & Routing

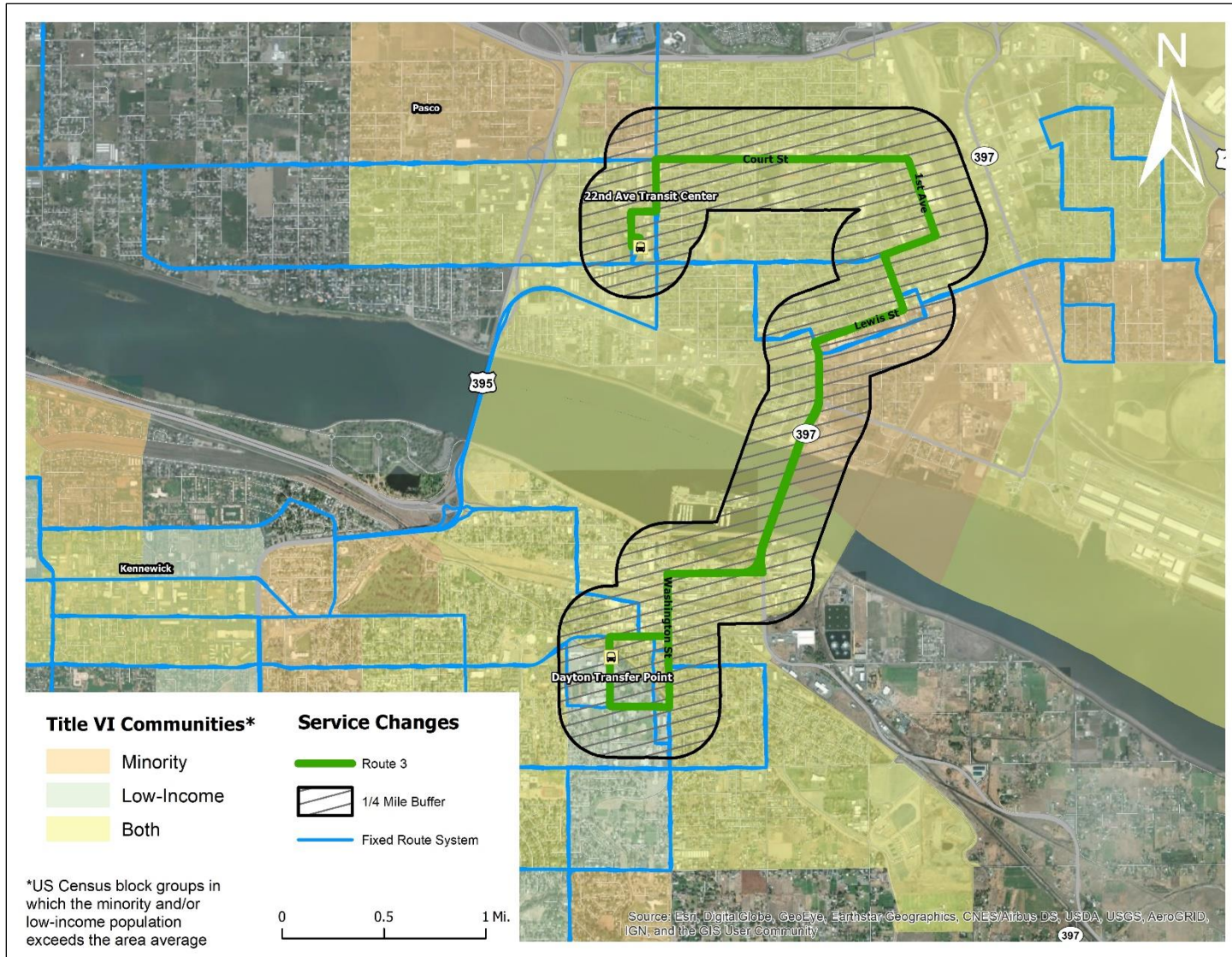
Table 3 - Route 3 Frequency

| | Weekdays | | Saturdays | |
|----------------------------|-------------|--------------|-------------|--------------|
| | 6 AM – 8 PM | 8 PM – 10 PM | 7 AM – 7 PM | 7 PM – 10 PM |
| Recommended Route 3 | 15 | 15 | 15 | 15 |

Table 4 - Route 3 Service Span Changes (approximate time)

| | Weekday | Saturday |
|----------------------------|---------------------------|---------------------------|
| Recommended Route 3 | 6:00 AM – 10:00 PM | 7:00 AM – 10:00 PM |

Map 5- Route 3 Implementation Service Change Impacts



Recommended Route 20 Service Change Profile

- Route 20
 - New local route
 - Adheres to same route alignment as current route 120 between Knight St Transit Center and West Richland Transit Center
 - Potential schedule adjustments to accommodate better connection on transfer centers
 - 2 vehicles needed to operate
- Implementation planned for June 2021
- Demographic Breakdown:

| | <u>Recommended Route 20</u> |
|--------------|------------------------------------|
| Total: | 7,112 |
| Minority %: | 22.3% |
| Low-Income%: | 14.3% |

Route 20 Recommended Frequency, Service Span, & Routing

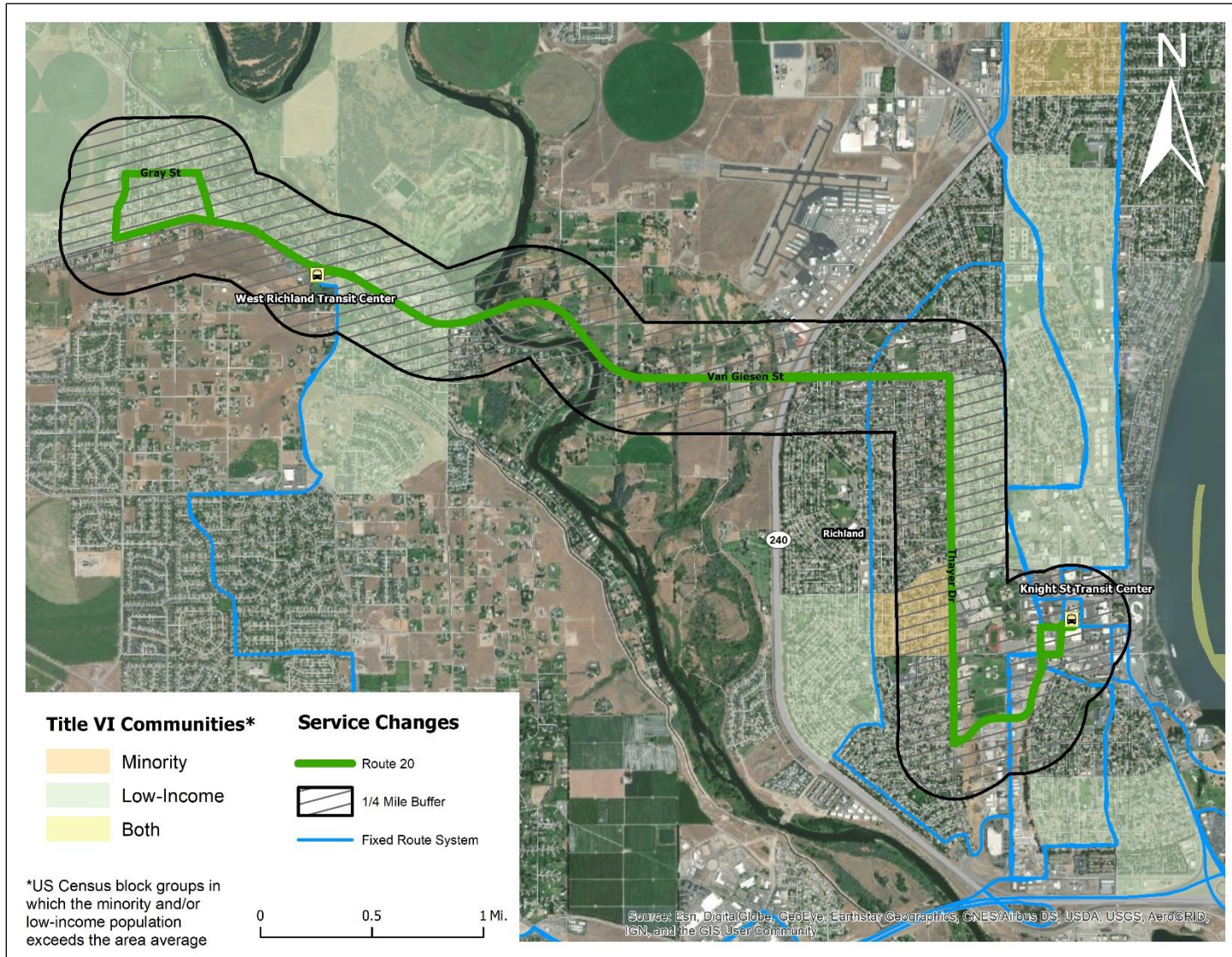
Table 5 - Route 20 Frequency

| | Weekdays | | Saturdays | |
|-----------------------------|-------------|--------------|-------------|--------------|
| | 6 AM – 8 PM | 8 PM – 10 PM | 7 AM – 7 PM | 7 PM – 10 PM |
| Recommended Route 20 | 30 | 30 | 30 | 30 |

Table 6 - Route 20 Service Span Changes (approximate time)

| | Weekday | Saturday |
|-----------------------------|---------------------------|---------------------------|
| Recommended Route 20 | 6:00 AM – 10:00 PM | 7:00 AM – 10:00 PM |

Map 6- Route 20 Implementation Service Change Impacts



Recommended Route 26 Service Change Profile

- Route 26
 - New local route
 - Adheres to same route alignment as the northern segment of current route 126 north of Knight St Transit Center
 - 20-minute frequency during the majority of weekdays and Saturdays
 - 30-minute frequencies from 8 PM to 10 PM
 - 2 vehicles needed to operate
- Implementation planned for June 2021
- Demographic Breakdown:

| | <u>Recommended Route 26</u> |
|--------------|------------------------------------|
| Total: | 5,978 |
| Minority %: | 31.6% |
| Low-Income%: | 17.4% |

Route 26 Recommended Frequency, Service Span, & Routing

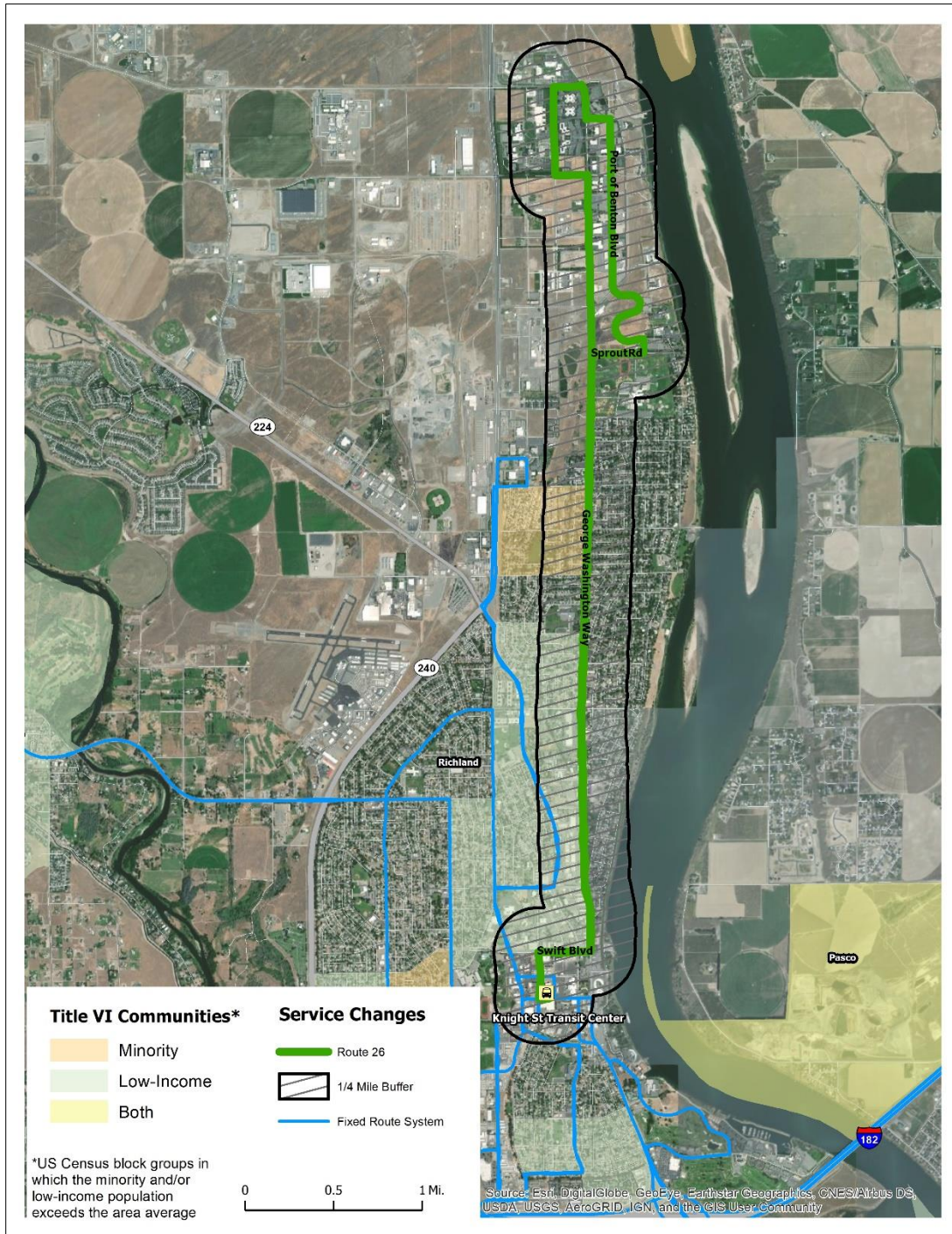
Table 7 - Route 26 Frequency

| | Weekdays | | Saturdays | |
|-----------------------------|-------------|--------------|-------------|--------------|
| | 6 AM – 8 PM | 8 PM – 10 PM | 7 AM – 7 PM | 7 PM – 10 PM |
| Recommended Route 26 | 20 | 30 | 20 | 30 |

Table 8 - Route 26 Service Span Changes (approximate time)

| | Weekday | Saturday |
|-----------------------------|---------------------------|---------------------------|
| Recommended Route 26 | 6:00 AM – 10:00 PM | 7:00 AM – 10:00 PM |

Map 7 – Route 26 Implementation Service Change Impacts



Recommended Route 40 Service Change Profile

- Route 40
 - New local route
 - Provides increased service between Three Rivers Transit Center and Dayton St Transfer Point
 - Provides more direct trips between the Clearwater commercial corridor areas and the high density of low-income and minority populations living adjacent to Olympia St and 10th Ave intersection in Kennewick
 - Replaces service to some of the coverage area of eliminated Route 160
 - 30-minute frequency during the majority of weekdays and Saturdays
 - 2 vehicles needed to operate
- Implementation planned for June 2021
- Demographic Breakdown:

| | <u>Recommended Route 40</u> |
|--------------|------------------------------------|
| Total: | 18,955 |
| Minority %: | 53.5% |
| Low-Income%: | 30.8% |

Route 40 Recommended Frequency, Service Span, & Routing

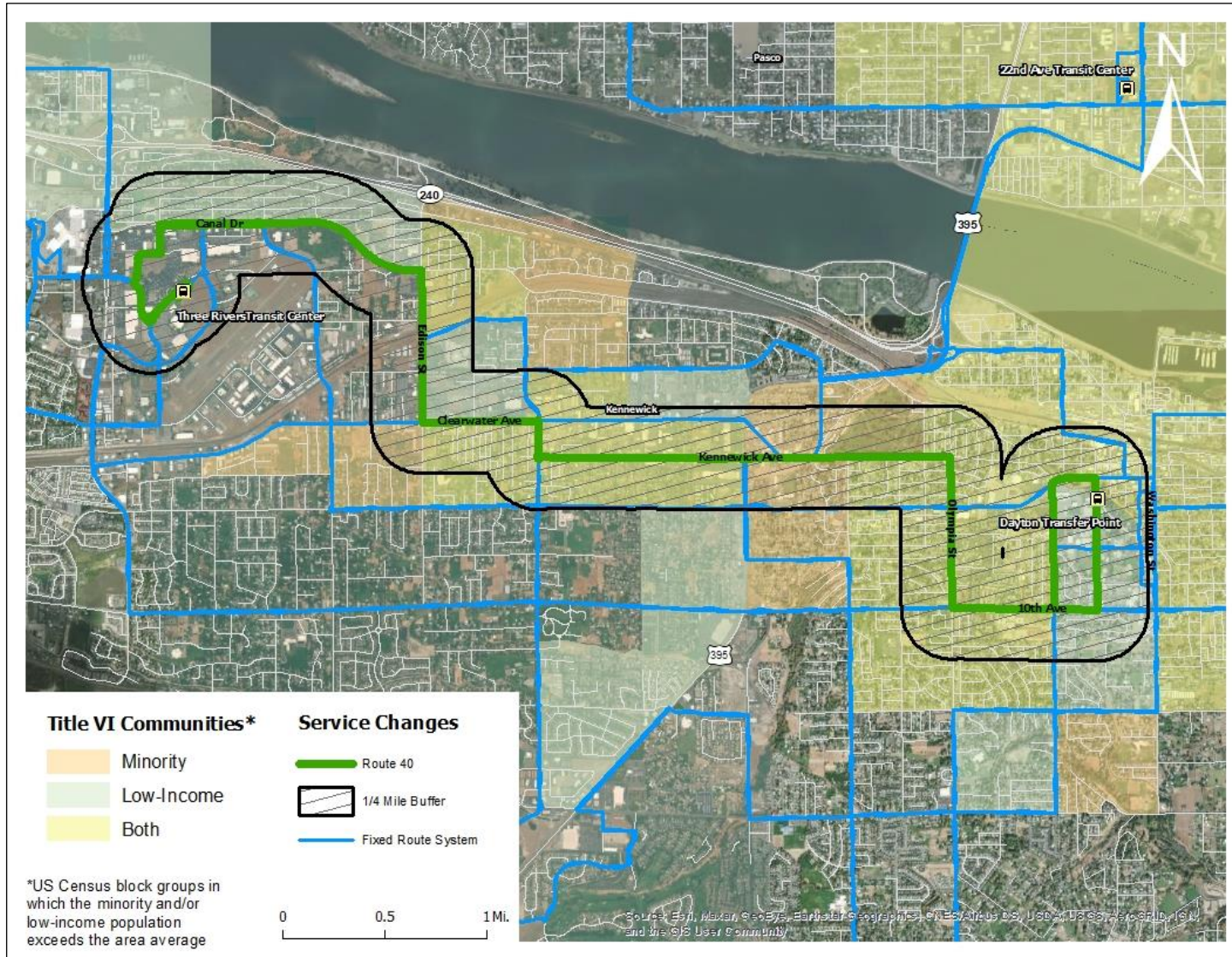
Table 9 - Route 40 Frequency

| | Weekdays | | Saturdays | |
|-----------------------------|-------------|--------------|-------------|--------------|
| | 6 AM – 8 PM | 8 PM – 10 PM | 7 AM – 7 PM | 7 PM – 10 PM |
| Recommended Route 40 | 30 | - | 30 | - |

Table 10 - Route 40 Service Span Changes (approximate time)

| | Weekday | Saturday |
|-----------------------------|--------------------------|-------------------|
| Recommended Route 40 | 6:00 AM – 8:00 PM | No service |

Map 8 – Route 40 Implementation Service Change Impacts



Recommended Minor Service Changes

- Route 42
 - Increase to 30-minute frequencies from 7 AM to 8 PM on Saturdays
- Route 47
 - Increase to 30-minute frequencies from 7 AM to 8 PM on Saturdays
- Route 110
 - Shift schedules 15 minutes back to allow for better connections where route intersects with other fixed routes
- Route 225
 - Redesignated as Route 2A
 - No expected reduction in service to coverage area
 - Implemented at a later date
- Route 268
 - Redesignated as Route 2B
 - No expected reduction in service to coverage area
 - Implemented at a later date

Recommended Route Elimination – Major Service Changes

- Route 120
 - Truncated and western segments redesignated as Route 20
 - Eastern segments covered by new Route 1
 - No expected reduction in service to coverage area other than highway segments with no stops
- Route 126
 - Truncated and northern segments redesignated as Route 26
 - Southern segments covered by new Route 1
 - No expected reduction in service to coverage area
- Route 150
 - Covered by new Route 1 between Three Rivers Transit Center and Dayton Transfer Point
 - Covered by new Route 3 between Dayton Transfer Point and 22nd Ave Transit Center
 - No expected reduction in service to coverage area other than highway segments with no stops
- Route 160
 - Covered by new Route 1 between Three Rivers Transit Center and Cleawater Ave & Yelm St
 - Covered by Route 40 on Kennewick Ave from Yelm St to Olympia St
 - Service eliminated on Kennewick Ave between Olympia St and Garfield St (4 stops total)
 - Covered by new Route 3 between Dayton Transfer Point and 22nd Ave Transit Center

Major Service Changes (August 2020 – Sunday Service)

Recommended Sunday Service Implementation Profile

- Base fixed route network that includes:
 - Route 1
 - Route 42
 - Route 225
 - Route 64
 - Route 3
 - Route 123
- 8:00 AM to 6:30 PM fixed route service
- Reduced frequencies on most routes
- Addition of approximately 8,000 revenue hours annually
- Addition of approximately 2,000 revenue miles annually
- Implementation planned for August 2021
- Demographic Breakdown:

Recommended Sunday Service

| | |
|-------------|--------|
| Total: | 68,335 |
| Minority: | 50.4% |
| Low-Income: | 20.6% |

Sunday Service Recommended Frequency, and Service Span

Table 11 – Sunday Fixed Route Frequencies

| Route | Frequency | Service Span |
|-------|-----------|-------------------|
| 1 | 30 | 8:00 AM – 6:30 PM |
| 225 | 30 | 8:00 AM – 6:30 PM |
| 3 | 30 | 8:00 AM – 6:30 PM |
| 42 | 30 | 8:00 AM – 6:30 PM |
| 64 | 30 | 8:00 AM – 6:30 PM |
| 123 | 30 | 8:00 AM – 6:30 PM |

2021 Annual Service Plan Title VI Service Equity Analysis Results

This section details results from a service equity analysis conducted for the planned implementation of the FSC and local route adjustments that will be implemented in June 2021. Results for implementation of Sunday fixed route service, which will be implemented in August 2021, are also included. These recommended service changes will constitute as a major service change per BFT's Major Service Change Policy if implemented, thus a service equity analysis is required.

BFT conducts service equity analyses in order to prevent adverse effects, disparate impact, disproportionate burdens and unfair treatment of minority and low-income populations in BFT's service area. Specifically, BFT staff are required to "valuates significant system-wide service and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact." This service equity analysis was conducted by BFT staff to evaluate proposed service changes, which do not include any fare changes, in compliance with FTA Circular 4702.1B §4, Chap.4-10.

Given the fact that the proposed fixed route service changes have a widespread impact on a large percentage of the fixed route network, this service equity analysis was conducted on a system-wide basis. That said, service changes will result in a substantial increase in service and there are very few areas that will experience decreased frequencies or service elimination.

It should also be noted that route nomenclature (i.e., route naming and numbering) may be adjusted between service change approval and service implementation. That said, routing and levels of service will stay the same. Any changes to route nomenclature between service change approval and implementation will be identified and explained to both the BFT Board of Directors and the public.

Equity Analysis Methodology

BFT staff utilized Remix to conduct this service equity analysis. Remix has the capability to automatically generate a Title VI report (2012-2016 American Community Survey data) by comparing existing fixed routes to the proposed changes. Remix implements the following methodology to provide accurate service equity analysis data:

1. Calculate low-income and minority population within 1/4 mile of current and proposed fixed route
 - For each route, build a shape that represents the area within quarter mile of any of its route alignment
 - Intersect the catchment area with 2012-2016 ACS Census data. Get a list of block groups and the percentage overlap with each.
 - For each block group, take the percentage of overlap and multiply it by the block group's statistics
2. Compare the number of people-trips, before and after

- Multiply the population near a route times the number of trips it makes (per year) to get “people-trips”
 - Repeat for low-income and minority populations to get “low-income people-trips” and “minority people-trips”
 - Compare these numbers between the current and the proposed versions of the route, to get a set of people-trip differences. Remix compares current routes to proposed routes that have the same name.
3. Get the total difference in people-trips across the transit system
 - Repeat the process above for every route in the transit system
 - Sum the difference in people-trips. This will return three numbers: total difference in people-trips, total difference in low-income people-trips, and total difference in minority people-trips.
 4. Calculate the change borne by low-income and minority populations
 - Divide the total difference in low-income people-trips by the total difference in people-trips to get the percentage of change borne by those with low-income
 - Repeat for minority people-trips
 5. Compare the percentage change to the average in the service area
 - Calculate the average percentage of low-income and minority populations across the entire service area
 - Subtract from the change borne by those populations
 - Get two final numbers: the difference between the impact this set of transit changes had on low-income and minority populations compared to any average change

June 2021 Service Equity Analysis Results

Recommended implementation of routes 1 and 3, which will be designated as “Frequent Service Corridor” routes, will qualify as a major service change per BFT’s Major Service Change Policy due to the substantial change in the route’s coverage area, revenue hours, and revenue miles. Route 2A and 2B are just a reclassification of current route 225 and 268, and thus does not result in a major service change. Service change recommendations involving the local route system (i.e. routes 20, 26, 40) will also qualify as a major service change. As such, a service equity analysis was conducted to determine if the recommended change planned for 2021 will result in a disparate impact and/or disproportionate burden on the minority and low-income populations.

Disparate Impact Analysis

If the impact of a major service change proposal requires a minority population to receive benefits 20% less or to bear adverse effects 20% more than those benefits or adverse effects received or borne by the non-minority population, that impact will be considered a disparate impact per BFT’s Disparate Impact Policy.

Minority populations will experience 55.5% of the effects of the planned implementation FSC and local route service changes. This is 17.9% above the area average. Changes borne by minority populations will

not exceed the area average by more than 20% and no potential disparate impact is expected. Service changes will result in a substantial increase for minority populations.

Disproportionate Burden Analysis

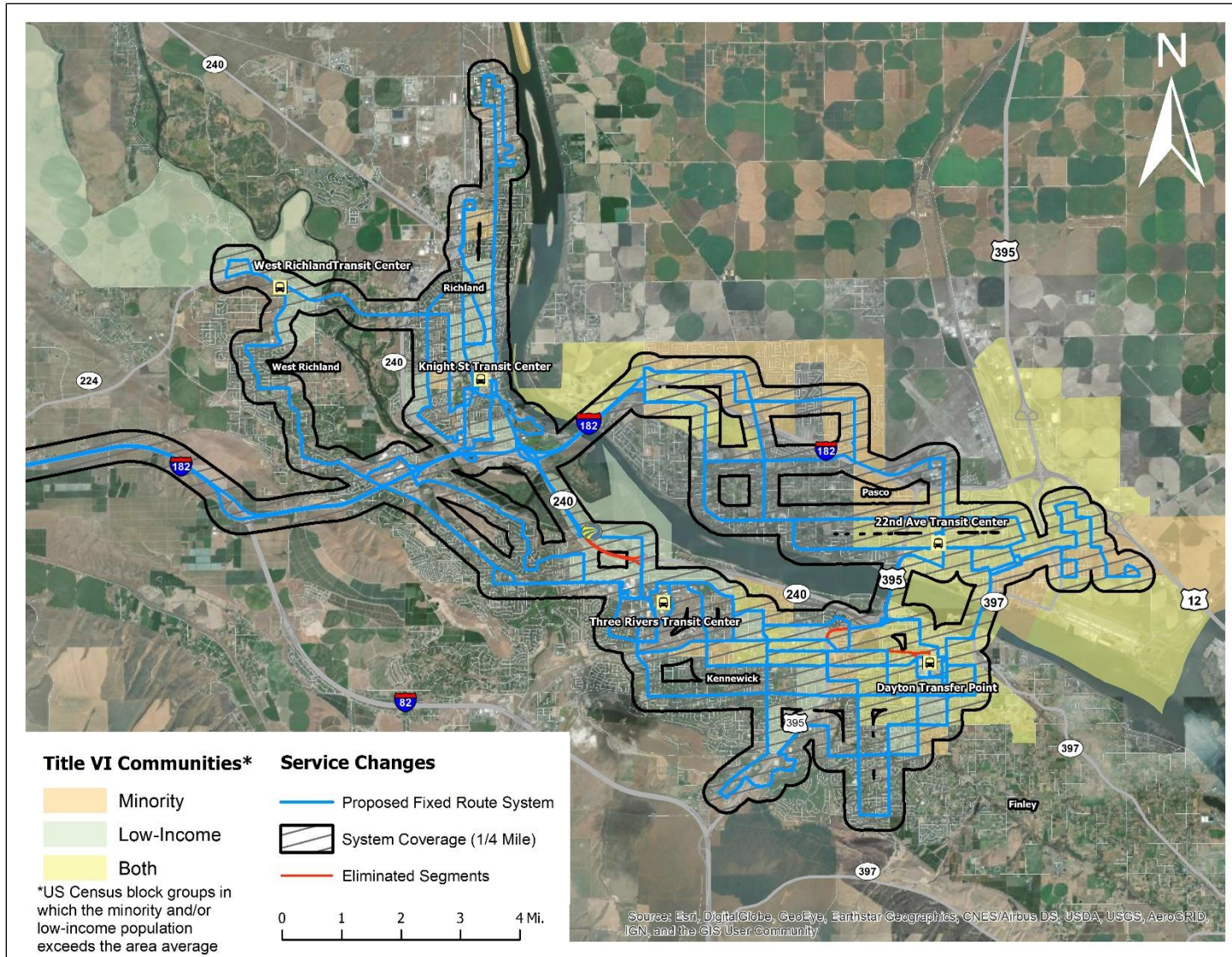
If the impact of a major service change proposal or any fare change proposal requires a low-income population to receive benefits 20% less or to bear adverse effects 20% more than those benefits or adverse effects received or borne by the non-minority population, that impact will be considered a disproportionate burden.

Low-income populations will experience 26.9% of the effects of the planned implementation FSC and local route service changes. This is 12.2% above the area average. Changes borne by low-income populations will not exceed the area average by more than 20%, meaning there will be no potential disproportionate burden. Regardless, the planned changes will result in an increase of service to low-income populations.

Table 12 – FSC & Local Fixed Route Service Change Data (Increased Service)

| Baseline Fixed Route System | | | | Proposed Service Change | | | | Service Change Impact Breakdown (People-Trips Difference) | | | | |
|-----------------------------|------------|----------|--------------|----------------------------|------------|----------|--------------|---|-------------|--------------|---------------------|------------|
| Population (1/4 mi) | | | | Population (1/4 mi) | | | | Additional People-Trips | | | Change Borne | |
| Total | Low-Income | Minority | Annual Trips | Total | Low-Income | Minority | Annual Trips | Total | Low-Income | Minority | Low-Income | Minorities |
| 147,167 | 16.1% | 42.9% | 267,030 | 149,612 | 16.2% | 43.0% | 338,885 | 468,648,625 | 126,447,186 | 260,545,025 | 26.9% | 55.5% |
| | | | | | | | | | | Area Average | 14.7% | 37.6% |
| | | | | | | | | | | Delta | 12.2% | 17.9% |

Map 9 - FSC & Local Fixed Route Service Change Implementation Impacts



Source: U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimate

August 2021 Service Equity Analysis Results

Recommended addition of fixed route service on Sundays will qualify as a major service change per BFT’s Major Service Change Policy due to the substantial change in the route’s coverage area, revenue hours, and revenue miles. As such, a service equity analysis was conducted to determine if the plan to incorporate current fixed route Sunday service will result in a disparate impact and/or disproportionate burden on the minority and low-income populations.

Disparate Impact Analysis

If the impact of a major service change proposal requires a minority population to receive benefits 20% less or to bear adverse effects 20% more than those benefits or adverse effects received or borne by the non-minority population, that impact will be considered a disparate impact per BFT’s Disparate Impact Policy.

Minority populations will experience 53.0% of the effects of the planned implementation of Sunday fixed route service. This is 15.4% above the area average. Changes borne by minority populations does exceed the area average by more than 20%, but no potential disparate impact is expected due to the fact that Route 268 will actually increase service to minority populations.

Disproportionate Burden Analysis

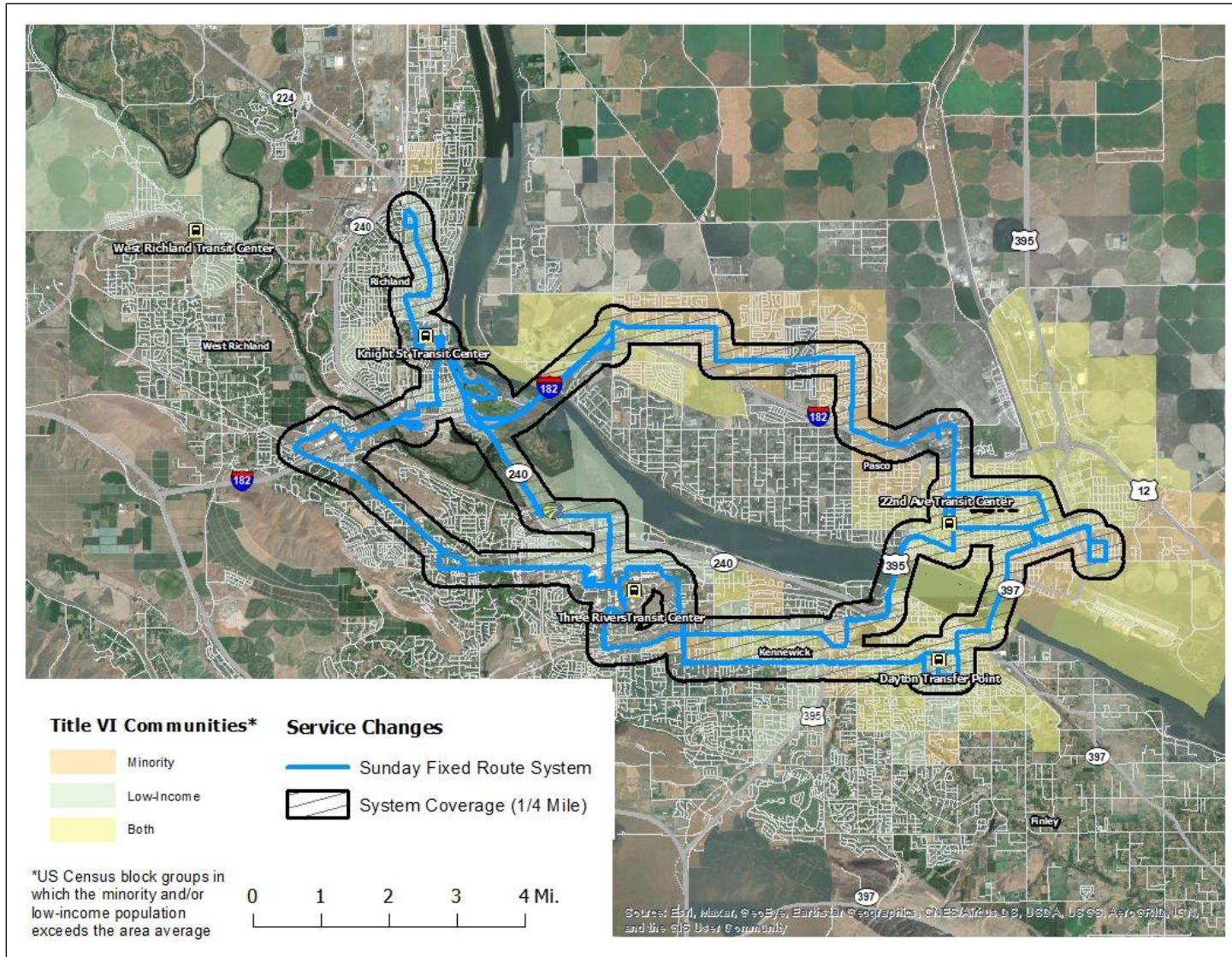
If the impact of a major service change proposal or any fare change proposal requires a low-income population to receive benefits 20% less or to bear adverse effects 20% more than those benefits or adverse effects received or borne by the non-minority population, that impact will be considered a disproportionate burden.

Low-income populations will experience 21.9% of the effects of the planned implementation of Sunday fixed rout service. This is 7.2% above the area average. Changes borne by low-income populations will not exceed the area average by more than 20%, meaning there will be no potential disproportionate burden. Regardless, the planned changes will result in an increase of service to low-income populations.

Table 13 - Sunday Service Change Data (Increased Service)

| Baseline – No Sunday Service | | | | Proposed Service Change | | | | Service Change Impact Breakdown (People-Trips Difference) | | | | |
|------------------------------|------------|----------|--------------|----------------------------|------------|----------|--------------|---|------------|--------------|---------------------|------------|
| <i>Population (1/4 mi)</i> | | | | <i>Population (1/4 mi)</i> | | | | <i>Additional People-Trips</i> | | | <i>Change Borne</i> | |
| Total | Low-Income | Minority | Annual Trips | Total | Low-Income | Minority | Annual Trips | Total | Low-Income | Minority | Low-Income | Minorities |
| 0 | 0 | 0 | 0 | 68,595 | 20.7% | 50.4% | 13,805 | 177,088,670 | 38,702,782 | 93,905,350 | 21.9% | 53.0% |
| | | | | | | | | | | Area Average | 14.7% | 37.6% |
| | | | | | | | | | | Delta | 7.2% | 15.4% |

Map 10 - Sunday Service Implementation Impacts



Source: U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimate

Service Equity Analysis Summary

Based on the service equity analysis results pertaining to the implementation of FSC routes, local route changes, and Sunday fixed route service, BFT staff have concluded that there will be no disparate impact or disproportionate burden will occur if these planned service changes are implemented. This conclusion means that there will be no apparent adverse effects on minority or low-income populations will be caused with the planned service changes outlined in the 2021 Annual Service Plan. In fact, if implemented, these service changes will result in a significant net gain of service to low-income and minority populations and will benefit all those who utilize BFT’s fixed route system. Fixed route service changes planned for June 2021 are expected to increase revenue hours by approximately 5% annually. The addition of Sunday fixed route service in August 2021 is expected to account for an additional 5% in revenue hours annually.

The only population that could potentially be negatively impacted by the proposed service changes outlined in the 2021 Annual Service Plan would be those who live in the residential areas adjacent to Kennewick Ave, between Olympia St and Dayton St. Although four fixed route bus stops will be removed, those who reside in these areas will be within close walking distance of bus stops located along routes 40, 41 and 42. BFT’s on-demand CONNECT service will also be available to those who are unable to make the short walk. As such, adverse impacts on Title VI populations are not expected.

Table 14 - Disparate Impact & Disproportionate Burden Determination

| Service Changes | Date Effective | Major Service Change | Disparate Impact | Disproportionate Burden |
|-----------------------|----------------|----------------------|------------------|-------------------------|
| Route 1 | 6/14/21 | Yes | No | No |
| Route 225 | 6/14/21 | No | N/A | N/A |
| Route 268 | 6/14/21 | No | N/A | N/A |
| Route 3 | 6/14/21 | Yes | No | No |
| Route 20 | 6/14/21 | Yes | No | No |
| Route 26 | 6/14/21 | Yes | No | No |
| Route 40 | 6/14/21 | Yes | No | No |
| Route 42 | 6/14/21 | No | N/A | N/A |
| Route 47 | 6/14/21 | No | N/A | N/A |
| Route 110 | 6/14/21 | No | N/A | N/A |
| Sunday Service | 8/30/21 | Yes | No | No |

Public Outreach & Comments

During the 30-day public comment period BFT staff held two virtual open houses to gain feedback on the proposed service changes outlined in the 2021 Modified Service Plan.

Five (5) members of the public attended the two open houses held on Zoom at 12:00 p.m. on March 17, 2021 and 5:00 p.m. on March 24, 2021. BFT also solicited comment via social media and through a comment-enabled map on our web page, allowing the public to comment on specific aspects of route alignments and schedules in a visual format (Remix). Public comments received during the 30-day public comment period are detailed below:

Virtual Open House Comments

- Will 8-10 p.m. frequencies be increased on routes such as 42 and 47?
- What determines where bus stops are located along the FSC route? Will there be more or less stops along the segments of FSC routes that run through Pasco?
- It looks like transfers will be more common at Knight St now that the 126 has been split apart.
- When will Route 2 on the FSC be implemented? Will BFT ever operate Bus Rapid Transit?
- Where will the future West Pasco transit center be located?
- Routes 47 should be included in Sunday service.
- Overall, I like what BFT is proposing and I'm excited for when the new service to start.

Social Media Comments

- None received.

Remix Map Comments

- Route 1
Turning left onto Yelm from 395 can be problematic at times. Left turning traffic can and will overflow into the left lane of 395 (after the Columbia Drive exit and before Yelm).

Is there enough room for a 40' bus to turn right at this intersection without taking up more than one turn lane on to Kennewick Ave? Also, there is no left turn signal for traffic turning north onto Yelm from Kennewick Ave.
- Route 3
Does this bus stop (the north end of the Albertsons strip mall) not get enough ridership currently to warrant being part of Route 3 Outbound?
- Route 40
Need bus stops along Olympia in both directions.

- Sunday Route Recommendation

Need a route to serve South Kennewick. My suggestion, a modified Route 47 that serves the highest ridership areas along the current route.

APPENDIX F

Title VI & Language Assistance Plan Open House and Public Hearing Note

As part of the 30-day public comment period, BFT staff hosted two open house events covering the 2022 Title VI Program update and Language Assistance Plan. The in-person event took place on Monday, June 13, at 5 p.m. at the Mid-Columbia Library in Pasco at 1320 W. Hopkins Street. The virtual open house was held via Zoom on Wednesday, June 15, at 12 noon.

There were no major comments received during either of these events.

A public hearing was also held on July 14th during the regularly scheduled Board Meeting, prior to Board approval. Two comments were received during the public hearing. The first comment stated that social media posts need to be posted and translated in Spanish. BFT already does this but will make efforts to make sure these posts are more visible to LEP persons. The second comments stated that BFT needs to work with the area's schools to provide better information regarding our services.

APPENDIX G

BEN FRANKLIN TRANSIT RESOLUTION 47-2022



A RESOLUTION APPROVING BEN FRANKLIN TRANSIT'S 2022 TITLE VI PROGRAM UPDATE

- WHEREAS, Service Development staff have reviewed the program with the Board of Directors, staff, and public input was gathered during the 30-day Public Comment Period; and
- WHEREAS, Ben Franklin Transit's Title VI Program and Language Assistance Plan have been revised to reflect suggested changes and edits received during the public comment period; and
- WHEREAS, An update to the Major Service Change policy was made and communicated to the public; and
- WHEREAS, Ben Franklin Transit's Board of Directors are aware of results from the 2019-2022 service monitoring efforts; and
- WHEREAS, The 2022 Title VI Program will be submitted to the Federal Transit Administration for comment and additional feedback; and
- WHEREAS, Ben Franklin Transit will provide its programs and services in the manner that is dictated by the contents of the 2022 Title VI Program and Language Assistance Plan through the program's expiration in 2025.

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

The 2022 Title VI Program update is adopted by Ben Franklin Transit's Board of Directors and submitted to the Federal Transit Administration for review.

APPROVED AT A REGULAR BEN FRANKLIN TRANSIT BOARD OF DIRECTORS MEETING held Thursday, July 14, 2022, at 1000 Columbia Park Trail, Richland, Washington.

ATTEST:


Janet Brett, Clerk of the Board


Will McKay, Chair

APPROVED AS TO FORM BY:


Jeremy J. Bishop, Legal Counsel

Memorandum

Date: July 6, 2022

To: Edwin G. Frost, Interim General Manager

From: Keith Hall, Director of Planning and Service Development

Re: 2022 Title VI Program Update Approval

Background

As a direct recipient of federal funds via the Federal Transit Administration (FTA), Ben Franklin Transit (BFT) is obligated to operate its programs and services without regard to race, color, and national origin in accordance with Title VI and other applicable laws.

As outlined in FTA Circular 4702.1B, to demonstrate BFT's compliance with Title VI, a Title VI Program must be reviewed and updated on a triennial basis. Additionally, BFT operates its programs and services in compliance with Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," Executive Order 13166, "Improving Access to Service for Persons with Limited English Proficiency," and the Federal Department of Transportation's (DOT) guidance to recipients pursuant to both Executive Orders. BFT's commitment to meeting Title VI, Environmental Justice, and Limited English Proficiency (LEP) requirements is reflected in the agency's planning, public involvement, and decision-making processes.

BFT updates the Title VI Program every three years and submits results from the service and fare equity analysis, internal service monitoring, and passenger surveys to the FTA for review. BFT's current Title VI Program will expire on July 31. An updated Title VI Program needs to be approved by the Board of Directors and submitted to FTA before this date. A draft version of the Title VI Program update was released for a 30-day public comment period on June 2. There were no major comments received during the public comment period.

Service Monitoring

Using census data, BFT gathered and analyzed data on race, national origin, language, and economic status for the entire Public Transit Benefit Area (PTBA). This information was used to update the draft 2022 Title VI Program and Language Assistance Plan. Additionally, Planning staff analyzed the fixed route performance metrics to determine whether current transit service and amenities are distributed equitably across the service area.

Title VI requirements for service monitoring include:

- Vehicle load factor
- Vehicle headway
- On-time performance
- Distribution of service
- Distribution of amenities
- Distribution of vehicles
- Access to services
- Fare equity

Major Service Change Policy

Planning staff revised the existing definition of a Major Service Change to provide a more concise framework for conducting future service equity analyses. This is the only significant change to BFT's Title VI-related policies.

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

- Any change in service on any individual route that would eliminate more than 20% of the route revenue hours. All major service changes will be subject to an equity analysis which includes an analysis of adverse effects.
- Any change where systemwide revenue hours allocated to minority areas falls below the share of the service area population residing in minority areas.

Title VI Survey

As part of the Title VI Program Update, BFT staff conducted a rider survey during the month of April. This survey gathered demographic and usage information from riders. Over 2,000 responses were collected during the course of the survey period. This total includes surveys collected online and on route. This survey data was incorporated into the Title VI Program and will also be considered for future planning processes.

Analysis

Per 2020 census data, minority populations account for 41.8% of BFT's service area population; 14.3% of the service area population is considered low income.

No equity issues in the existing distribution of services and amenities were found as part of the 2022 Title VI Program Update. Planning staff will continue to conduct a systemwide equity analysis as part of the Annual Service Change process.

Public Outreach

As part of the 30-day public comment period, BFT staff hosted two open house events covering the 2022 Title VI Program update and Language Assistance Plan. The in-person event took place on Monday, June 13, at 5 p.m. at the Mid-Columbia Library in Pasco at 1320 W. Hopkins Street. The virtual open house was held via Zoom on Wednesday, June 15, at 12 noon.

There were no major comments received during the 30-day public comment period.

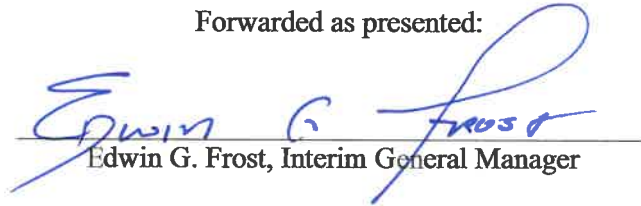
Funding

| | |
|-----------------|------------------|
| Budgeted: | No Budget Impact |
| Budget Source: | No Budget Impact |
| Funding Source: | No Budget Impact |

Recommendation

Staff recommends the Board of Directors approve the adoption of the 2022 Title VI Program updates. The 2022 Title VI Program will be submitted to the FTA for review. All FTA input will be addressed, and future revisions may be necessary.

Forwarded as presented:



Edwin G. Frost, Interim General Manager