

RESOLUTION NO. _____

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF
MESA, MARICOPA COUNTY, ARIZONA, ADOPTING THE
CITY OF MESA FEDERAL TRANSIT ADMINISTRATION
(FTA) TITLE VI IMPLEMENTATION PLAN SUPPLEMENT
TO THE CITY OF PHOENIX TITLE VI IMPLEMENTATION
PLAN.**

WHEREAS, Title VI of the Civil Rights Act of 1964, states that “[n]o person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

WHEREAS, every three years recipients of federal funding must submit an updated Title VI Implementation Plan that documents compliance with federal Title VI guidance. As a subrecipient of Federal Transit Administration (“FTA”) funding, the City of Mesa (“Mesa”) is required to submit an updated plan supplement to the City of Phoenix who is the designated recipient of FTA funding in the Phoenix-Metro area.

WHEREAS, the Mesa Title VI Implementation Plan Supplement update was completed in collaboration with Valley Metro and the City of Phoenix. In addition, Mesa’s Title VI Coordinator conducted in-depth training with all Mesa staff Title VI liaisons on new FTA Title VI program guidance and requirements.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF MESA, MARICOPA COUNTY, ARIZONA, AS FOLLOWS:

Section 1: The City of Mesa Federal Transit Administration (FTA) Title VI Implementation Plan Supplement to the City of Phoenix Title VI Implementation Plan attached hereto as **Exhibit A** and incorporated herein by this reference is hereby adopted by the City of Mesa.

PASSED AND ADOPTED by the City Council of the City of Mesa, Maricopa County, Arizona, this 25th day of February, 2019.

APPROVED:

Mayor

ATTEST:

City Clerk



CITY OF MESA
FEDERAL TRANSIT ADMINISTRATION (FTA)
TITLE VI IMPLEMENTATION PLAN

Supplement to the City of Phoenix Title VI Implementation Plan

January 2019

Submitted By:

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Diversity Office

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Transit Services Director
Transit Services

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www.mesaaz.gov



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TITLE VI INTRODUCTION

The Federal Transit Administration (FTA) is responsible for ensuring that its funding recipients fully comply with Title VI of the Civil Rights Act of 1964 as well as Executive Order 12898 on Environmental Justice in their planning and implementation processes. Subsequent to issuance of the Executive Order the U.S. Department of Transportation (DOT) issued Order 5610.2(a) for implementing the Executive Order on Environmental Justice. DOT Order on Environmental Justice establishes compliance procedures for Executive Order 12898 that further directs that federal programs, policies and activities not have a disproportionately high and adverse human health and environmental effect on minority and low-income populations. In addition, the DOT's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (70 FR 74087) establishes guidance for the prohibition against national origin discrimination in Title VI of the Civil Rights Act of 1964, as it affects (denial of meaningful access to services) limited English proficient persons.

Section 601 of Title VI of the Civil Rights Act of 1964 states the following:

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

Executive Order 12898 states:

"Each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."

Pursuant to Title 49 U.S.C. Chapter 53, as amended, the City of Phoenix Public Transit Department is the designated recipient of funds under FTA Sections 5307 and 5309. As the designated recipient for federal funding, the City of Phoenix Public Transit Department's is responsible for providing the FTA with a Title VI Update every three years in accordance with FTA Circular 4702.1B dated October 1, 2012 and with reporting requirements detailed in 49 CFR Section 21.9(b).

The City of Mesa, as a "sub recipient" of to the City of Phoenix Transit Department, is required to submit a Title VI Implementation Plan to the designated "recipient", the City of Phoenix, every three years as well as provide annual updates. This methodology or implementation plan draws heavily upon guidance and recommendations provided in Chapters III of FTA Circular 4702.1B dated October 1, 2012. The purpose of this report is to assess the compliance of the City of Mesa with the Civil Rights Act of 1964, DOT Order 5610.2, and Executive Order 12898 and 70 FR 74087.

Regional transit services are provided by the City of Phoenix and Valley Metro, the designated providers for the Phoenix metropolitan area including the City of Mesa. The City of Phoenix operates the fixed route bus service, and Valley Metro also provides fixed route bus service, light rail service and complementary paratransit service across the region. In addition, Valley Metro distributes transit funds from the countywide transit sales tax to its member agencies, including the City of Mesa.



TITLE VI POLICY STATEMENT

The City of Mesa operates without regard to race, color, or national origin in accordance with the Civil Rights Act of 1964. Title VI of the Civil Rights Act requires that no person in the United States shall be excluded from participation in, be denied the benefits of or otherwise be subjected to discrimination under any City program or activity, on the grounds of race, color, or national origin. The City of Mesa strives to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not. To help ensure access to City programs, services and activities, the City will provide translations, will reasonably modify policies and procedures and will provide auxiliary aids or alternative formats to persons with disabilities or limited English Proficiency.

As a sub recipient of federal funding, The City of Mesa is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by the U.S. Department of Justice per 28 Code of Federal Regulations (CFR) § 42.401 et seq. and 28 CFR § 50.3.

Should the City of Mesa distribute Federal-aid funds to another entity/person, Mesa will ensure all sub recipients fully comply with Mesa's Title VI Nondiscrimination Program requirements. The City Manager has delegated the authority to City of Mesa Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

Christopher Brady, City Manager

Date



NOTIFICATION TO THE PUBLIC

Notice to the public, notifying their protection under Title VI, has been posted on the City of Mesa's website www.mesaaz.gov and posted in all City of Mesa public buildings and other key locations such as public areas, park-n-rides, stations and transit vehicles (including circulators and paratransit) in both English and Spanish. (See Appendix A).

Additional transit related notification is also posted on the City of Mesa's website as seen below.

Public Transit Issues

City of Mesa public transit services are provided without regard to race, color, or national origin, per Federal Transit Administration (FTA) Circular - 4702.1B.

Any person who believes she or he has been denied transit services because of any unlawful discriminatory practice under Title VI may file a complaint with the Valley Metro Customer Service Care center or with the City of Mesa.

For more information on how to file a complaint, contact:

Valley Metro Customer Service

Phone: (602) 253-5000

TTY: (602) 251-2039

csr@valleymetro.org

Mailing Address:

Attn: Customer Service,
Valley Metro/RPTA
4600 E. Washington St., Suite 101
Phoenix, AZ 85034

City of Mesa Transit Services Department

Mailing Address:

Transit Services Department
P.O. Box 1466
Mesa, AZ 85211-1466

FTA Title VI information is available to the public in person at the Mesa City Plaza, 20 E. Main St., Mesa 85201 or Mesa Transportation/ Services Center, 300 E. 6th St, Mesa 85201.



(Spanish Translation)

Asuntos relacionados con el transporte público

Los servicios de transporte público de la Ciudad de Mesa están disponibles para todos los usuarios sin distinción de raza, color u origen nacional, conforme a la Administración Federal de Tránsito (FTA), Circular - 4702.1B.

Toda persona que considere que se le ha negado un servicio de tránsito como consecuencia de una práctica discriminatoria ilegal, bajo el Título VI, puede presentar una queja al centro de atención al cliente de Valley Metro o ante la Ciudad de Mesa.

Para más información acerca de la manera correcta de presentar una queja, comuníquese con las siguientes personas:

Servicio al cliente de Valley Metro

Tel. (602) 253-5000

TTY: (602) 251-2039

csr@valleymetro.org

Dirección de correos:

Atn. Servicio al cliente,

Valley Metro/RPTA

4600 E. Washington St., Suite 101

Phoenix, AZ 85034

Departamento de Servicios de Tránsito de la Ciudad de Mesa

Dirección de correos:

Departamento de Servicios de Tránsito

P.O. Box 1466 Mesa, AZ 85211-1466

La información del Título VI de FTA está disponible para el público en persona en Mesa City Plaza, 20 E. Main St., Mesa 85201 o Mesa Transportation / Services Center, 300 E. 6th St, Mesa 85201.

CITY OF MESA TITLE VI COMPLAINT PROCEDURES

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

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been excluded from, denied the benefits of, or subjected to discrimination by the City in relation to any program or activity administered by the City or its sub recipients, consultants, or contractors on the basis of race, color, or national origin may file a written complaint with the Title VI Coordinator.

Procedure

1. The complaint must meet the following requirements:

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

2. Upon receipt of the complaint, the Title VI Coordinator will determine its jurisdiction, acceptability, need for additional information, and investigate the complaint, if accepted.

3. A complaint must meet the following criteria for acceptance:

- a. The Complaint must be filed within 180 days of the alleged occurrence.
- b. The allegation must involve a covered basis such as race, color, or national origin.
- c. The allegation must involve a City of Mesa program or activity, as a federal-aid recipient; or its sub-recipient or contractor.

4. A complaint may be dismissed for the following reasons:

- a. The Complainant requests the withdrawal of the complaint.

- b. The Complainant fails to respond to repeated requests for additional information needed to process the complaint.
 - c. The Complainant cannot be located after reasonable attempts.
- 5. The Complainant will be provided with a written acknowledgement that the City has either accepted or rejected the complaint. If accepted, the complaint will be recorded identifying: Complainant's name, basis, alleged harm, race, color, or national origin of the Complainant.
- 6. An investigative report will be conducted within 90 calendar days of the accepted complaint by the Title VI Coordinator and Legal Counsel. The report shall include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition.
- 7. The Title VI Coordinator/Legal Counsel will make a determination on the disposition of the complaint. Dispositions will be stated as follows:
 - a. In the event the City of Mesa is in noncompliance with the Title VI regulations remedial actions will be listed.
- 8. Notice of the determination will be mailed to the Complainant. Notice shall include information regarding appeal rights of Complainant and instructions for initiating such an appeal. Notices of appeals are as follows:
 - a. The Title VI Coordinator will reconsider the determination if new facts come to light.
 - b. If Complainant is dissatisfied with the determination and/or resolution set forth by the Title VI Coordinator, the same complaint may be submitted to the appropriate federal agency for investigation. Contact information including agency name, telephone number, address and website, pertaining to the appropriate federal agency will be disclosed.
- 9. A copy of the complaint and the Title VI Coordinator's investigation report/letter of finding and Final Remedial Action Plan, if appropriate, will be issued to FTA within 120 days of the receipt of the complaint.
- 10. A summary of the complaint and its resolution will be included as part of the City of Mesa's Title VI annual updates.

Note: These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide remedies that include punitive damages or compensatory remuneration for the complainant. Every effort will be made to obtain early resolution of complaints. The option of informal mediation meeting(s) between the affected parties and the Title VI Coordinator may be used for resolution, at any stage of the process.



Complaints for alleged non-compliance with Title VI and related statutes may also be lodged with Valley Metro Customer Service. Any such complaint must be filed within 180 days of the alleged discriminatory act (or latest occurrence). To submit a complaint online, fill out the online complaint form found at www.valleymetro.org.

To submit a claim by mail or in person, please fill out the printable complaint form found at www.valleymetro.org and mail/take to:

Regional Public Transportation Authority
4600 E. Washington St., Suite 101
Phoenix, Arizona 85034
Email: csr@valleymetro.org
Phone: (602) 253-5000
TTY: (602) 251-2039

Individuals may also file complaints directly with the Federal Transit Administration (FTA) within the 180-day timeframe to:

Federal Transit Administration (FTA)
Attention: Title VI Coordinator
East Building, 5th Floor –TCR
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Complaints received by Valley Metro Customer Service will be assigned to the appropriate staff member(s) for investigation in accordance with federal standards (28 CFR Part 35 and FTA Circular 4702.1B). After the complaint is processed, Valley Metro Customer Service will respond to the complainant and, if warranted by the investigation, take appropriate action. The City of Phoenix, as the designated recipient of federal funds for this region, is responsible for monitoring this process.

Note: To request information about Valley Metro's Title VI Policy, please send an e-mail to TitleVICoordinator@valleymetro.org. To request information in alternative formats, please contact Customer Service at csr@valleymetro.org or phone: (602) 253-5000, TTY: (602) 251-2039.



CITY OF MESA TITLE VI COMPLAINT FORM

Thank you for filling out this complaint form. The City of Mesa is committed to ensuring that no person is excluded from participation, denied the benefits of, or subjected to discrimination by the City in relation to any program or activity administered by the City or its sub recipients, consultants, or contractors on the basis of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact the Title VI Coordinator, Andrea Alicoate, by calling 480-644-5034 or sending an email request to diversity.info@mesaaz.gov.

The completed form must be returned to City of Mesa Title VI Coordinator, c/o Andrea Alicoate, PO BOX 1466, Mesa, AZ 85211 or submitted electronically below.

1. Complainant's Name:

Address:

City: _____ State: _____ Zip Code: _____

Telephone (Home): _____ (Cell): _____

Email: _____

2. Person(s) discriminated against (if different than above).

Name:

Address:

City: _____ State: _____ Zip Code: _____

3. What was the discrimination based on? (Check all that apply)

Race Color National Origin

4. Date of incident resulting in discrimination:

5. Describe how you feel you were discriminated against. What happened and who was responsible? For additional space, attach additional sheets of paper or use back of the form.



6. What City of Mesa representatives were involved?
7. Where did the incident take place? Please provide location, date, time, etc.
8. Why do you think this incident occurred and how do you feel it could have been avoided?
9. How can this issue be resolved to your satisfaction?
10. Was there a witness? Please provide their contact information. If more than one witness, please attach additional sheets of paper or use the back of the form.

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Numbers: (Home) _____ (Business): _____

Email: _____

11. Did you file this complaint with another federal, state, or local agency; or with a federal or state court? (Check the appropriate space)

Yes Date Filed: _____ No

If answer is yes, please list each agency (and contact person if applicable) complaint was filed with:

12. Sign and date the complaint in space below. Attach any documents you believe supports your complaint.

Your rights in Title VI Non-Discrimination Complaints

Filing this complaint with the City of Mesa Title VI Coordinator does not prevent you from filing a complaint with the Federal Agency providing funding to the party against which a complaint is being lodged. Complaints for alleged non-compliance with Title VI and related statutes may also be lodged with Valley Metro Customer Service. Any such complaint must be filed within 180 days of the alleged discriminatory act (or latest occurrence). To submit a complaint online, fill out the online complaint form found at www.valleymetro.org.



To submit a claim by mail or in person, please fill out the printable complaint form found at www.valleymetro.org and mail/take to:

Regional Public Transportation Authority
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Phoenix, Arizona 85034
Email: csr@valleymetro.org
Phone: (602) 253-5000
TTY: (602) 251-2039

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1200 New Jersey Avenue, SE
Washington, D.C. 20590

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TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

Investigations: There were no Title VI investigations during the reporting period.

Lawsuits: There were no Title VI lawsuits filed during the reporting period.

Complaints: The City of Mesa recognizes 6 complaints related to Title VI as recorded by Valley Metro operated services and uncategorized operators. Please reference the list of complaints reported in the Title VI Program plan submitted by Valley Metro, which includes those within the City of Mesa.

November 2015 to June 2018
Routes operated by Valley Metro

Complaint Number	Incident Date	Routes	Primary Category	Subcategory	Action Taken	Result
287505	2/08/16	61	Operator	Pass Up	Operator to be monitored.	Found Valid
297490	5/25/16	96	Fares	Fare Policy	No evidence of discrimination could be determined based on investigation. Operator followed fare policy. No action was taken.	Unfounded
303423	8/4/16	112	Operator	Discrimination	No evidence of discrimination could be found. Issue addressed with operator per company policy.	Unfounded
331269	6/7/17	96	Operator	Attitude	No evidence of discrimination could be found. Issue addressed with operator per company policy.	Unfounded
352546	1/04/18	61	Operator	Discrimination	No evidence of discrimination could be found. Issue addressed with operator per company policy.	Undetermined
365868	5/14/18	45	Operator	Pass Up	No evidence of discrimination could be found. Issue addressed with operator per company policy.	Undetermined

PUBLIC PARTICIPATION PLAN

The City of Mesa is engaging the public in its planning and decision-making processes, as well as its marketing and outreach activities. The public will be invited to participate in the process whether through public meetings or surveys as provided by the operating transit provider, Valley Metro. As an agency receiving federal financial assistance, the following community outreach efforts have been conducted via Valley Metro, which include public participation within the City of Mesa:

Public Outreach and Involvement Activities Summary for Service Changes

January 1, 2015 – December 31, 2017

Date/Time	Venue	Type
October 2015 Service Changes		
May 1, 2015	Tempe Transit Center (By Bus Stop) 200 E 5th St, Tempe, AZ 85281	A-Frame
May 1, 2015	(Stop) Scottsdale Fashion Square Mall East of Crate and Barrell on Fashion Square Lane north of Camelback	A-Frame
May 1, 2015	(Stop) Scottsdale and Camelback	A-Frame
May 1, 2015	Superstition Springs Transit Center 6555 E. Southern Ave., Mesa	A-Frame
May 1, 2015	(Stop) Price Rd & Queen Creek (Stop) Price Rd & Wells Fargo Campus	A-Frame
May 1, 2015	(Stop) Chandler Blvd & Gilbert Rd (Stop) ASU Polytechnic Tiburon Ave & Innovation Way	A-Frame
May 1, 2015	Chandler Park-and-Ride Germann Rd & Hamilton St., SW corner	A-Frame
May 1, 2015	Community Park Litchfield Rd & Avalon Dr	A-Frame
May 1, 2015	(Lot 59) Packard Dr/ Rio Salado Pkwy (Stop) McAllister, N of Apache	A-Frame
May 20, 2015		Public Webinar
May 28, 2015	Valley Metro 101N. 1 st Ave., Phoenix	Public Hearing
April 2016 Service Changes		
November 1, 2015	(A-Frame) Estrella Mountain CC (Sign) McDowell & Dysart NB/SB	A-Frame
November 1, 2015	BIFF Mesa Riverview	A-Frame
November 1, 2015	Central Station 44th Street and Washington	A-Frame
November 1, 2015	PNR, 83rd and Butherus Dr Hayden Rd at Indian Bend Hayden Rd at Camelback R	A-Frame
November 1, 2015	White Tank Justice Court Community Center (Signs)Yuma & Watson (both directions, 2 signs)	A-Frame
November 18, 2015		Public Webinar
December 1, 2015	Valley Metro 101N. 1 st Ave., Phoenix	Public Hearing

October 2016 Service Changes		
May 12, 2016		Public Webinar
May 18, 2016	Valley Metro 101N. 1 st Ave., Phoenix	Public Hearing
October 2016	Dreamy Draw PNR End of line	A-Frame
October 2016	Bus Stop	A-Frame
October 2016	24 St/Baseline Rd PNR (4 signs) 24th St/Baseline 24th St/Francisco Dr	A-Frame
October 2016	ASU West 19th Ave /Cactus 19th Ave/Dunlap	A-Frame
October 26, 2016		Webinar
November 1, 2016	Valley Metro 101N. 1 st Ave., Phoenix	Public Hearing
October 2017 Service Changes		
May 2017	Union Hills/ 57th Ave Union Hills/59th Ave	A-Frame
May 2017	Glendale Ave/83rd Ave	A-Frame
May 2017	Arrowhead Mall (6 signs) Bell Rd	A-Frame
May 2017	AZ Ave/ Chicago AZ Ave/Frye Boston/Delaware	A-Frame
May 2017	Ryan/Gilbert Rd	A-Frame
May 2017	Downtown Phx	A-Frame
May 2017	59th Ave/Myrtle	A-Frame
May 9, 2017		Public Webinar
May 15, 2017	Valley Metro 101N. 1 st Ave., Phoenix	Public Hearing
April 2018 Service Changes		
November 7, 2017		Webinar
November 14, 2017	Valley Metro 101N. 1 st Ave., Phoenix	Public Hearing

City of Mesa/ Valley Metro Public Participation Plan

Introduction

The regional transit public input/outreach process is conducted by Valley Metro for various transit-related activities and actions. Throughout the year, Valley Metro conducts public outreach activities related to capital projects, transit service changes, fare changes, and other transit-related events. This Title VI Public Participation Plan was established to ensure adequate inclusion of the public throughout the Phoenix metropolitan community in accord with the content and considerations of Title VI of the Civil Rights Act of 1964. Federal regulations state that recipients of federal funding must “promote full and fair participation in public transportation decision-making without regard to race, color or national origin.” Valley Metro uses this Plan to ensure adequate involvement of low-income, minority and limited English proficient (LEP) populations, following guidance from the Title VI Requirements and Guidelines for Federal Transit Administration Recipients Circular¹ (Circular).

Involving the general public in Valley Metro practices and decision-making processes provides helpful information to improve the transit system and better meet the needs of the community. Although public participation methods and extent may vary with the type of plan, program and/or service under consideration as well as the resources available, a concerted effort to involve all affected parties will be conducted in compliance with this Plan along with Federal regulations. To include effective strategies for engaging low-income, minority and LEP populations, the Circular suggests that the following may be considered:

- Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities.
- Employing different meeting sizes and formats.
- Coordinating with community- and faith-based organizations, educational institutions and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.
- Considering radio, television print and/or digital ads or information on stations, in publications and through communication channels that serve LEP populations.

¹ United States Department of Transportation, Federal Transit Administration, Circular 4702.1B.

- Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.

Valley Metro currently practices all of these strategies, in compliance with Federal regulations, so that minority, low-income and LEP populations are informed and also have meaningful opportunities to engage in planning activities and provide input as part of the decision-making process.

Typical Public Participation Opportunities

Valley Metro provides opportunities to share information or receive public input through a variety of methods for public participation utilized to engage low-income, minority and LEP populations through many outlets.

For planning efforts, including fare and service changes, public meeting locations are held at a centralized area or near affected route areas and bilingual staff is available. Public notices and announcements are published in minority-focused publications; some examples include: the *Arizona Informant* (African American community), *Asian American Times* (Asian American community), *La Voz* and *Prensa Hispana* (Hispanic community). Press releases are also sent to these media sources regarding fare changes, service changes and other programs. Additionally, printed materials, including comment cards or surveys, are available in Spanish.

A key participation effort, the Rider Satisfaction Survey, is conducted every two years. This survey is administered on transit routes across the region, reaching transit riders that live in minority and/or low-income communities. The survey, administered in English and Spanish, measures rider satisfaction with transit services and captures comments for improvements.

Throughout the year, minority, low-income and LEP populations have access to information via the Valley Metro Customer Service Center. The Customer Service Center is open 5 a.m. to 10 p.m., Monday through Friday; 6 a.m. to 8 p.m. on Saturdays; and 8 a.m. to 5 p.m. on Sundays and designated holidays. Customer Service staff is multilingual.

Also available is the website at valleymetro.org. Most information including meeting announcements, meeting materials and other program information is available on the website in both English and Spanish. If users would like information in another language, Valley Metro features Google translate on its website. This allows Valley Metro to reach citizens in five



languages with information on transportation services, proposed service changes and other programs.

Public Participation Methods

Valley Metro uses several specific public involvement techniques to ensure that minority, low-income and LEP persons are involved in transit decisions. Through the use of public involvement, media outlets and printed or electronic materials, Valley Metro disseminates information regarding planning efforts. These efforts include the activities described below.

- Public meetings, hearings and open houses are held regularly at community-familiar locations with public transportation access and at convenient times, in collaboration with city partners. These meetings provide an opportunity to meet with citizens and receive their comments and questions on proposed service changes and other programs. For each program, Valley Metro varies its meeting format in order to best engage the targeted population.
- Valley Metro has staff available at public meetings, hearings, events and open houses to answer questions and receive comments in both English and Spanish. Valley Metro also utilizes court reporters to record verbal comments at public hearings.
- Outreach for biannual service changes and other programs are conducted at or near the affected area, for example, along an affected bus route or at an affected transfer location, thus targeting the population that may be most impacted by proposed changes to service or routes. Oftentimes, these efforts are also executed at transit stations, community centers, civic centers or major transfer locations.
- Coordination with community- and faith-based organizations, educational institutions and other organizations occurs regularly. These coordination efforts assist Valley Metro in executing public engagement strategies that reach out to members of the population that may be impacted.
- Valley Metro conducts specially-tailored transit presentations to community groups. This includes mobility training for senior citizens and people with disabilities, as well as information on how to use the transit system for new residents and refugees. More comprehensive travel training is also conducted monthly at a regional center for customers with disabilities.
- All public meeting notices for biannual service changes and other programs are translated to Spanish. Notices regarding Valley Metro projects and programs are widely distributed

to the public through multiple methods, including through community- and faith-based organizations as well as via door hangers, direct mail, newspaper advertisement, electronic messaging (email through existing database), social media, door-to-door canvassing and on-board announcements on the transit system.

- Valley Metro publishes advertisements of any proposed service or fare change in minority publications in an effort to make this information more easily available to minority populations. Additionally, Valley Metro sends press releases regarding service changes and other programs to Spanish-language media.
- Valley Metro offers online participation via social media, webinar and email input as an alternative opportunity for comment.
- Major surveying efforts are conducted in both English and Spanish to ensure that the data collected is representative of the general public.
- Valley Metro Customer Service staff is multilingual.
- All comments are documented in a centralized database. For biannual service changes, comments are categorized as “in favor,” “not in favor” or “indifferent.” Comment summary information is provided to Valley Metro’s city partners for review and is also presented to the Valley Metro Board of Directors for consideration when taking action on proposed service changes.

Depending upon the type of project, program, or announcement, public participation methods may be customized to ensure that the general public is adequately involved in the decision-making process.

Conclusion

Valley Metro conducts public outreach throughout the year to involve the general public with agency activities and transit planning processes. Using a variety of communication techniques such as facilitating meetings at varied times and locations, using multiple formats, placing printed materials at multiple outlets and providing opportunities via phone and web to share or collect information, Valley Metro ensures that outreach efforts include opportunities for minority, low-income and LEP populations that may be impacted by the activity or transit planning process under consideration. Valley Metro will continue to involve all communities in an effort to be inclusive of all populations throughout the metro Phoenix area and to also comply with Federal regulations. Valley Metro will continue to monitor and update this Inclusive Public Participation Plan as part of the Title VI Program which is updated triennially.

LIMITED ENGLISH PROFICIENCY



1.0 INTRODUCTION

In 1993, the Valley Metro Regional Public Transportation Authority (RPTA) board adopted the name Valley Metro as the identity for the regional transit system in the Phoenix metropolitan area. Under the Valley Metro brand, local governments joined to fund the Valley-wide transit system that serves more than 73 million riders annually. Valley Metro provides fixed route bus service, light rail service and complementary paratransit service across the region. Valley Metro distributes transit funds from the countywide transit sales tax to its member agencies including the cities of Tempe, Mesa, Glendale, Phoenix, Buckeye, Tolleson, Wickenburg, Surprise, Peoria, Chandler, Gilbert, El Mirage, Avondale, Goodyear, Scottsdale, and Maricopa County. For the most part, Valley Metro and its member agencies utilize service providers for operations of bus, light rail and paratransit services. The cities of Glendale, Scottsdale, Peoria, and Phoenix contract some of their service directly to service providers.

The regional transit system has 61 local bus routes, 15 key local bus routes, 1 limited stop peak and 2 limited stop all-day routes, 20 Express/RAPID routes, 18 community circulator routes, one rural connector route, and one light rail system for a total of 103 regional routes. Valley Metro provides Dial-a-Ride service for seniors and persons with disabilities, as well as ADA paratransit service for those who are unable to use fixed route bus service.

Valley Metro and the region supports the goal of the U.S. Department of Transportation (USDOT) limited English proficient (LEP) guidance to provide meaningful access to its services by LEP persons. The Federal Transit Administration (FTA) notes that transit agencies that provide language assistance to LEP persons in a competent and effective manner will help ensure that their services are safe, reliable, convenient, and accessible to those persons. These efforts may attract riders who would otherwise be excluded from using the service because of language barriers and, ideally, will encourage riders to continue using the system after they are proficient in English and/or have more transportation options.

1.1 Regulatory Guidance

Title VI of the Civil Rights Act of 1964, provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives federal financial assistance.

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," issued on August 11, 2000, directs each federal agency to publish guidance for its respective recipients in order to assist with its obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. Providing English-

only services may constitute national origin discrimination in violation of Title VI and its implementing regulations.

The FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients", issued in October 2012 reiterates this requirement. Chapter III states that — FTA recipients must take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (page III-6)."

In the Phoenix Metropolitan Area, there are over seventy different languages identified in households where English is not the predominate language. Using the "Four Factor Analysis" prescribed by the FTA, this plan was developed to ensure that all transit providers effectively communicate with all users of the public transportation agency's services provided.

1.2 Four Factor Analysis

The FTA Circular 4702.1B identifies four factors that recipients of federal funds should follow when determining what reasonable steps should be taken to ensure meaningful access for LEP persons.

The four factor analysis involved the following:

1. Identify the number or proportion of LEP persons eligible to be served or likely to be encountered with transit service.
2. Determine the frequency with which LEP individuals come in contact with transit service.
3. Determine the nature and importance of transit service provided to LEP individuals.
4. Assess the resources available to the recipient for LEP outreach, as well as costs associated with that outreach.

This document describes Valley Metro's four-factor analysis and summarizes its LEP efforts, including staff training, followed by a description of how the plan will be monitored and updated.

2.0 LIMITED ENGLISH PROFICIENT POPULATION (FACTOR 1)

The Factor 1 analysis assessed the number and proportion of persons with limited English speaking proficiency likely to be encountered within the service area, which is defined as a one-half mile radial buffer around all fixed route services. The LEP population is those individuals who reported to the Census Bureau that they speak English "less than very well."

2.1 Evaluation Methods and Data Sources

In accordance with the FTA's policy guidance, the initial step for providing meaningful access to services for LEP persons and maintaining an effective LEP program is to identify LEP populations in the service area and their language characteristics through an analysis of available data. Determining the presence of LEP populations in the Valley Metro service area was completed through an analysis of several data sources, including:

- U.S. Census Bureau, Census 2000
- U.S. Census Bureau, 2013 American Community Survey (ACS) 5-Year Sample
- U.S. Census Bureau, 2016 American Community Survey (ACS) 5-year Sample

The U.S. Decennial Census 2010 data was not used, as the 2010 Census did not include language specific information on the census forms. The Census 2000 data provides some general information about language groups that is included below, though recognized to be 16 years old. Notably the demographic landscape has transformed since 2000, though this dataset provides a historical comparison and additional insight given the long form of Census 2000 provided more detailed sampling for population characteristics like language proficiency as compared to Census 2010 and the ACS, which is more of a random sample.

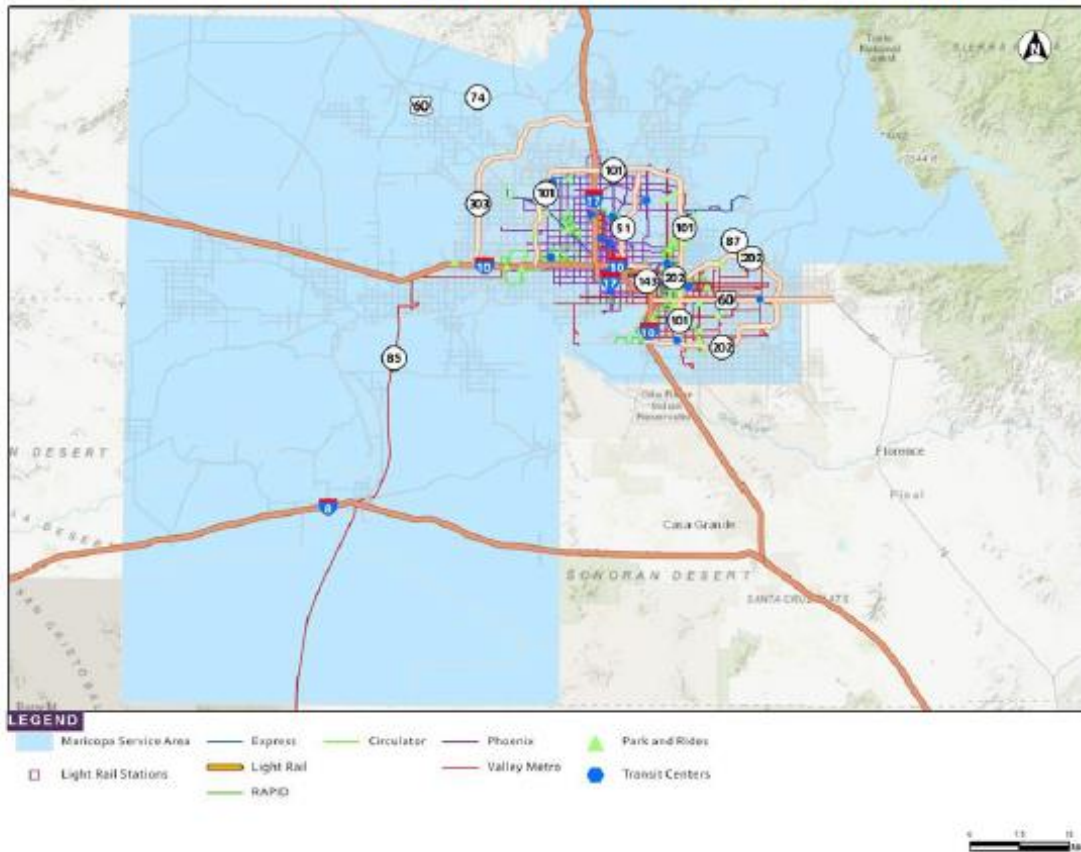
2.2 LEP Population Identification

FTA describes LEP persons as having a limited ability to read, write, speak, or understand English. For this LEP analysis, those who reported to the Census Bureau that they speak English "less than very well" were used to tabulate the LEP population for the transit service area.

Census 2000

U.S. Decennial Census 2000 provides information about English language proficiency within the Valley Metro service area. The census provides information on languages; recognizably this data is 16 years old and may not reflect the current state of the region. These data are available at the census block group and census tract level. There are 618 census tracts with one-half mile of fixed transit service. Figure 1 depicts the 2018 census tracts within Maricopa County. Census tracts encapsulated within the one-quarter mile buffer are also included in the estimates.

Figure 1: 2018 Maricopa County and Fixed Route Transit Service



The Census 2000 data include the number of persons ages 5 and above who self-identified their ability to speak English as “very well”, “well”, “not well”, and “not at all”. Table 1 shows English proficiency for the County and for Valley Metro’s service area using the Census 2000 data. The table shows that 12.1 percent of the population age 5 and over within the service area reported speaking English less than very well and is considered the overall LEP population. The census tracts within one-half mile of fixed route service have slightly higher population of LEP than Maricopa County.

Table 1: 2000 Census Data by Location

County or Area	Total Population Age 5 and Over	Speaks English Only	Speaks English		Percentage Less than Very Well
			Very Well	Less than Very Well	
Maricopa County	2,832,694	2,148,696	355,963	328,035	11.6%
Census Tracts within ½ -mile fixed routes	2,651,705	1,986,112	344,003	321,590	12.1%

Table 2 displays the data on English language proficiency for the census tracts within one-quarter mile around the fixed route service population ages 5 years and above by the linguistic categories identified by the U.S. Census Bureau, which include Spanish, Indo-European, Asian or Pacific Islander, and All Other Languages. In 2000, the population self-identified as speaking English less than "Very Well" was predominately the Spanish language group, encompassing 10.4 percent of the total population ages 5 years and over. Indo-European, Asian or Pacific Islander, and All Other Languages groups comprised 1.7 percent of the population. Of all those speaking English less than very well, the Spanish group comprises 86.0 percent of the total population over age five with limited English proficiency.

These numbers remain mostly consistent through the 2000s. In 2013 and 2016, the number of people that speak English less than "Very Well" dropped from 12.1 percent to about 10 percent (Table 4), however Spanish speakers continue to be the largest group in Maricopa County that self-identifies as speaking English less than "Very Well." Indo-European, Asian or Pacific Islander, and All Other Languages maintained similar percentages in comparison to the 2000 census data.

Table 2: 2000 Census Data by Language Category

Language Category	Total Population Age 5 and Over	Speaks English				Percentage Less than Very Well
		Very Well	Well	Not Well	Not At All	
Total	2,651,705	344,003	133,047	113,289	75,254	12.1%
English	1,986,112	-	-	-	-	0.0%
Spanish	528,613	252,587	103,991	99,549	72,486	10.4%
Indo-European	66,605	47,582	12,276	5,667	1,080	0.7%
Asian or Pacific Islander	44,109	24,273	12,210	6,372	1,254	0.7%
All Other Languages	26,266	19,561	4,570	1,701	434	0.3%

The Census 2000 data also provide information on linguistically isolated households. "A linguistically isolated household is one in which no member 14 years old and over (1) speaks only English and (2) speaks a non-English language and speaks English 'very well.' In other words, all members 14 years old and over have at least some difficulty with English" (Census 2000). In total, the Census 2000 Summary File 3 data identified 1,048,128 households. The entire membership of a linguistically isolated household would be considered LEP. Table 3 details those data for linguistically and non-linguistically isolated households by language category.

Table 3: 2000 Census Data by Linguistically Isolated Households

Language Category	Total Households	Isolated Households	Non-isolated Households	Percentage Isolated Households
Census Tracts 1/2 mile fixed routes	1,053,667	62,471	201,748	5.9%
English	788,723	-	-	-
Spanish	190,507	51,213	139,294	4.9%
Indo-European	40,883	5,161	35,498	0.5%
Asian or Pacific Islander	20,853	4,744	16,109	0.5%
All Other Languages	12,701	1,405	11,296	0.1%

Within the fixed route transit area 5.9 percent of households are considered linguistically isolated. Again, these are predominately Spanish households making up 4.9 percent of the total. Remaining languages comprise 1.1 percent of households that are classified as linguistically isolated.

Figure 2 shows a map depicting the concentrations of linguistically isolated households in census tracts within 0.5-mile of fixed route service. Most areas throughout the region are mixed, though there are a few pockets of Census blocks that have concentrations of linguistically isolated households, thus identified as persons with limited English proficiency.

American Community Survey

The American Community Survey (ACS) is a continuous nationwide survey conducted monthly by the U.S. Census Bureau to produce annually updated estimates for the same small area (census tracts and block groups) formerly surveyed via the decennial census long-form survey. It is intended to measure changing socioeconomic characteristics and conditions of the population on a recurring basis. It is important to note that the ACS does not provide official counts of the population between each decennial census, but instead provides weighted population estimates. This analysis uses ACS data from 2013 and 2016 to show changes over time, especially since the decennial 2010 census did not provide this information.

Figure 2: Census Tracts with Linguistically Isolated Households

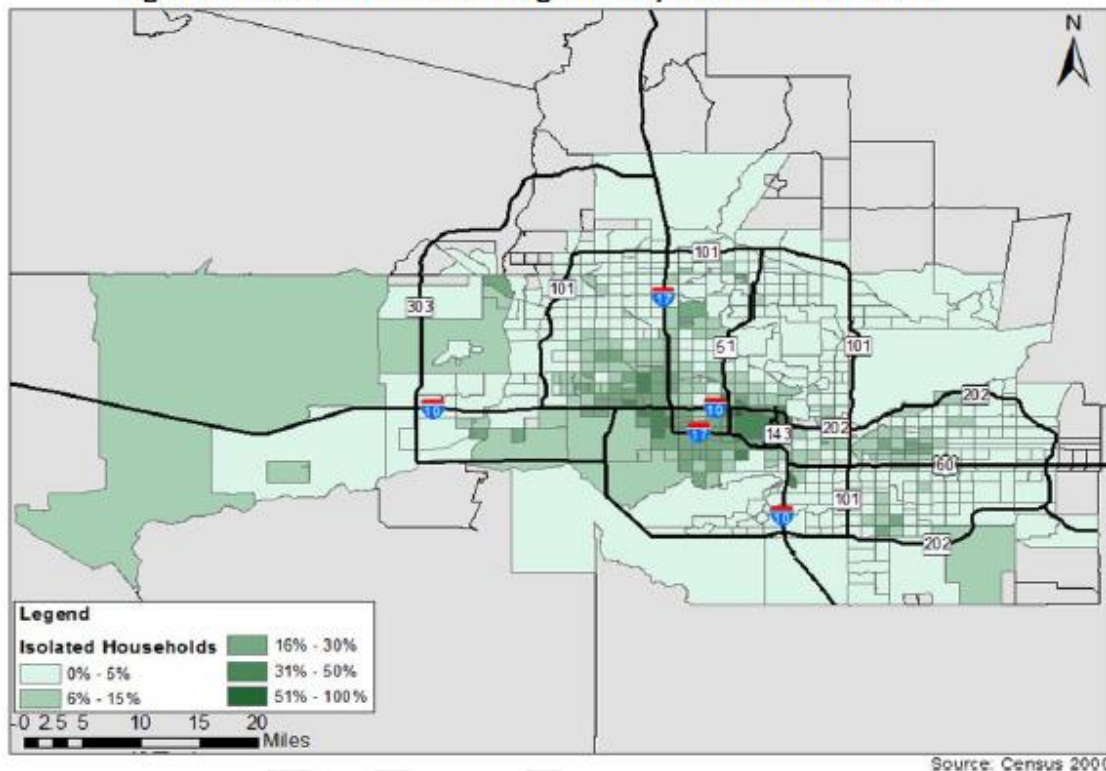
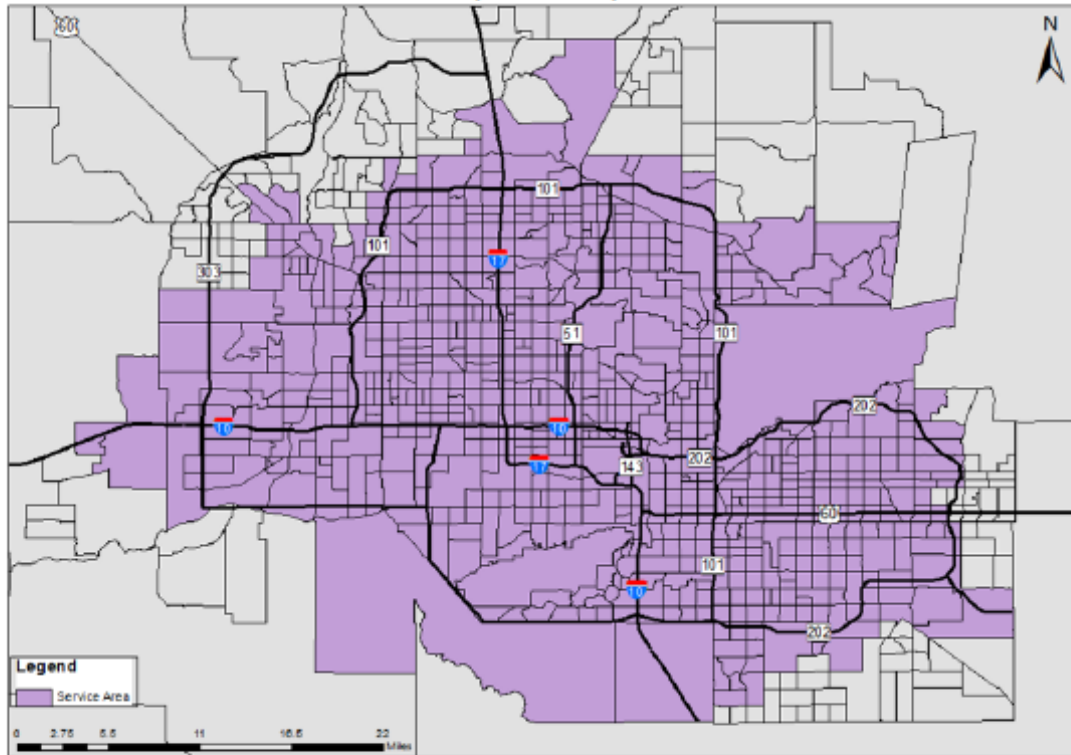


Figure 3 shows the ACS 2013 census tracts within the 0.5-mile buffer of transit routes. Census tracts encapsulated within this area are included in the estimates though they may not be within a 0.5-mile of a fixed route.

Table 4 shows English proficiency for the County and for Valley Metro's service area using the ACS 2013 and 2016 data. The ACS 2013 data estimates the population age 5 years and older within the service area to be 3,051,428 with 340,076, or 11.1 percent, of the population is LEP. The ACS 2016 data estimate the population age 5 years and older within the service area to be 3,154,617 with 330,125, or 10.5 percent, of the population is LEP. The census tracts within one-half mile of fixed route service have slightly higher population of LEP than Maricopa County.

Figure 3: 2015 Census Tracts within One-Quarter Mile of Fixed Route Service (ACS 2016)



Source: ACS 2013

Table 4: ACS 2013 and 2016 Data by Location

County or Area	Total Population Age 5 and Over	Speaks English Only	Speaks English		Percentage Less than Very Well
			Very Well	Less than Very Well	
2013 ACS					
Maricopa County	3,610,510	2,660,946	589,679	359,884	10.0%
Census Tracts 1/2-mile fixed routes	3,051,428	2,171,136	540,216	340,076	11.1%
2016 ACS					
Maricopa County	3,812,399	2,804,227	646,236	354,052	9.29%
Census Tracts 1/2-mile fixed routes	3,154,617	2,229,062	595,430	330,125	10.46%

Table 5 displays the data on English language proficiency for the census tracts within the one-quarter mile around the fixed route service population ages 5 years and above by the linguistic categories identified by the U.S. Census Bureau, which include Spanish, Indo-European, Asian or Pacific Islander, and All Other Languages. Predominately the population self-identified as speaking English less than "Very Well" is of Spanish language group, encompassing 9.1 percent (2013 ACS data) and 8.3 percent (2016 ACS data) of the total population ages 5 years and over. Indo-European, Asian or Pacific Islander, and All Other Languages groups comprised 2.1 percent of the population for both the 2013 and 2016 ACS data. Of all those speaking English less than very well, the Spanish group comprises 81.0 percent (2013 ACS) and 79.0 (2016 ACS) of the total population percent over age five with limited English proficiency.

Table 5: 2013 and 2016 ACS Census Data by Language Category

Language Category	Total Population Age 5 and Over	Speaks English				Percentage Less than Very Well
		Very Well	Well	Not Well	Not At All	
2013						
Total	3,002,765	536,151	140,541	126,210	71,269	11.2%
English	2,128,594	-	-	-	-	0.0%
Spanish	687,532	413,750	102,250	106,330	65,202	9.1%
Indo-European	75,146	56,623	12,386	5,048	1,089	0.6%
Asian or Pacific Islander	73,402	40,115	18,746	10,946	3,595	1.1%
All Other Languages	38,091	25,663	7,159	3,886	1,383	0.4%
2016						
Total	3,154,617	595,430	134,971	117,834	77,320	10.4%
English	2,229,062	-	-	-	-	0.0%
Spanish	725,756	463,540	94,718	97,718	69,780	8.3%
Indo-European	74,471	55,554	12,484	4,611	1,822	0.6%
Asian or Pacific Islander	81,683	46,873	19,589	11,272	3,949	1.1%
All Other Languages	43,645	29,463	8,180	4,233	1,769	0.4%

The 2016 ACS data also provide information on linguistically isolated households. "A linguistically isolated household is one in which no member 14 years old and over (1) speaks only English and (2) speaks a non-English language and speaks English 'very well.' In other words, all members 14 years old and over have at least some difficulty with English" (ACS 2016). In total, the 2016 ACS data identified 1,380,916 households. The entire membership of a linguistically isolated household would be considered LEP. Table 6 details those data for linguistically and non-linguistically isolated households by language category.

Table 6: 2016 ACS Data by Linguistically Isolated Households

Language Category	Total Households	Isolated Households	Non-isolated Households	Percentage Isolated Households
Census Tracts 1/2 mile fixed routes	1,380,916	63,166	1,317,750	4.6%
English		-	-	-
Spanish	251,862	47,618	204,244	3.4%
Indo-European	40,663	4,417	32,917	0.3%
Asian or Pacific Islander	34,811	7,746	27,065	0.6%
All Other Languages*		3,385		

*The ACS 2016 Data did not provide the number of total households for linguistically isolated households

The 2013 ACS data show 19 languages or language groups with 1,000 or more LEP persons and the 2016 ACS data show 12 languages or language groups with 1,000 or more LEP persons. However, only one LEP population exceeds 5 percent of the total population of persons eligible to be served or likely encountered. Table 7 shows the populations that meet either of these thresholds using ACS 2013 population by language and ability, sorted by percentage of LEP population.

Within one-half mile of fixed route service, the majority of the 2013 LEP population is the Spanish speaking population; this is the only language group to exceed 5 percent of the LEP population. The Spanish LEP population consists of 275,370 persons within the service area. The Chinese and Vietnamese speaking population followed with 2.65 percent and 2.76 percent respectively, both were approximately 9,000 persons. There are 4,908 Arabic speaking LEP persons or 1.44 percent of the LEP population. The fifth largest LEP population is Tagalog consisting of 4,114 people, or 1.21% of the LEP population within the service area.

The 2016 LEP population is also the Spanish speaking population that consists of 262,216 persons (77 percent) within the service area. The Chinese and Other Indo-European speaking population followed with 3.0 percent and 2.97 percent respectively, both were approximately 10,000 persons. There are 9,287 Vietnamese speaking LEP persons or 2.74 percent of the LEP population. The fifth largest LEP population is Other Asian Pacific Island consisting of 8,210 people, or 2.43 percent of the LEP population within the service area.

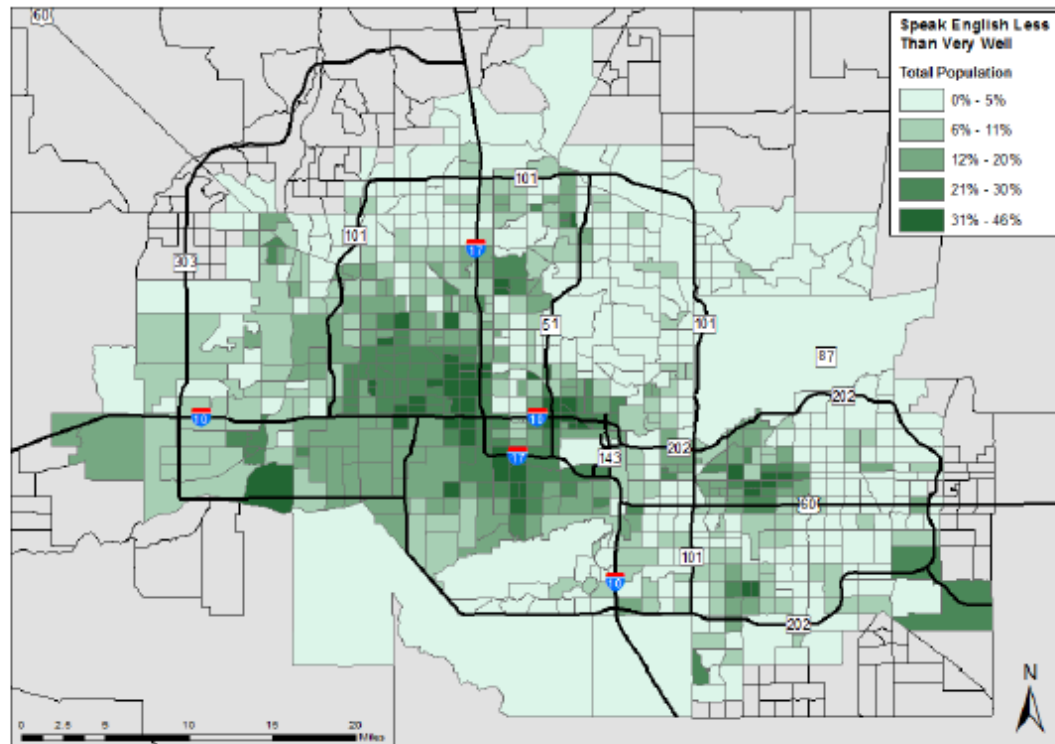
The ACS 2016 LEP populations within the service area are very similar to the 2013 ACS LEP populations.

Figure 4 shows a map depicting the concentrations of population speaking English Less than Very Well throughout the service area. Most areas throughout the region are mixed, though there are a few pockets of Census blocks that have concentrations of persons with limited English proficiency.

Table 7: ACS Data by Language within One-Half Mile of Fixed Route Service

Language	Speak English		Total Population	Percentage of Language LEP of Total LEP Population
	Less Than Very Well	Very Well		
ACS 2013				
All Languages	340,076	-	-	100%
Spanish	275,370	416,599	691,969	81.0%
Chinese	9,005	8,305	17,310	2.65%
Vietnamese	9,391	5,669	15,060	2.76%
Arabic	4,908	7,552	12,460	1.44%
Tagalog	4,114	8,918	13,032	1.21%
Other Asian	3,549	7,208	10,757	1.04%
African	3,301	4,485	7,786	0.97%
Korean	3,105	3,568	6,673	0.91%
Serbo-Croatian	2,833	4,177	7,010	0.83%
Other Languages	2,227	1,844	4,071	0.65%
Other Indo European	2,132	3,494	5,636	0.63%
Other Indic	1,894	3,989	5,883	0.56%
French	1,788	7,299	9,087	0.53%
Persian	1,788	2,821	4,609	0.53%
Other Pacific Island	1,278	3,037	4,315	0.38%
Russian	1,245	3,017	4,262	0.37%
Japanese	1,236	2,474	3,710	0.36%
Navajo	1,183	7,348	8,531	0.35%
German	1,199	9,624	10,823	0.35%
ACS 2016				
All Languages	338,335	-	-	100%
Spanish	262,216	463,540	725,756	77.50%
Chinese (includes Mandarin and Cantonese)	10,165	9,666	19,831	3.00%
Vietnamese	9,287	6,665	15,952	2.74%
Arabic	6,283	10,086	16,369	1.86%
Tagalog (includes Filipino)	4,512	9,750	14,262	1.33%
Korean	2,636	3,094	5,730	0.78%
Other Languages	7,899	19,377	27,276	2.33%
Other Indo European	10,057	27,339	37,396	2.97%
French, Haitian, or Cajun	2,105	6,999	9,104	0.62%
Other Asian Pacific Island	8,210	17,698	25,908	2.43%
Russian, Polish, or Other Slavic	5,559	11,443	17,002	1.64%
German or Other West Germanic	1,196	9,773	10,969	0.35%

Figure 4: Population Speaking English “Less than Very Well”



3.0 FREQUENCY OF CONTACT WITH LIMITED ENGLISH PROFICIENT POPULATION (FACTOR 2)

The first step of the four-factor LEP needs assessment revealed that the largest language group was overwhelmingly Spanish; followed by Chinese, Vietnamese, Arabic, and Tagalog. Factor 2 is intended to assess the frequency with which LEP persons interact with Valley Metro programs, activities, or services. The USDOT “Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Person” (USDOT 2005) advises that:

Recipients should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from different language groups seeking assistance, as the more frequent the contact, the more likely enhanced language services will be needed (emphasis added). The steps that are reasonable for a recipient that serves an LEP person on a one-time basis will be very different than those expected from a recipient that serves LEP persons daily.

The frequency of use was evaluated by assessing current resources, available data, and a short survey of transit employees.

3.1 Evaluation Methods and Data Sources

In an effort to determine the frequency that LEP persons interact with the agency, both quantitative and qualitative methods were used to analyze access to services. Anecdotal information regarding interactions with LEP persons, garnered through conversations with Valley Metro employees is also included in this section. More structured analysis is included using several sources of information:

- Transit Employee Survey
- Customer Service Interactive Voice Response (IVR) Call Log
- Transit Education Program
- Valley Metro Website Translation Data

Together these sources provide a picture of the interaction of LEP persons with programs, activities, or services provided by the agency.

3.2 Frequency of Contact Analyses

With about a quarter of the region speaking more than only English, Valley Metro recognizes the value of providing convenient and efficient information to transit riders. Understanding how often LEP persons are utilizing services will assist in serving customers better in the future with quality services, programs, and activities.

Transit Employee Survey

An employee survey was performed in an effort to determine how often those employees in contact with transit riders regularly encounter LEP persons. During late June-July 2018, a voluntary survey of customer service and transit employees was conducted regarding the interaction with LEP persons and languages spoken. A copy of the survey instrument can be found as Appendix B. The Valley Metro Customer Service Representatives provide passenger assistance most commonly through email, but also via the phone. In addition, there are several Customer Service Representatives that are dedicated for fare sales, transit information, or are stationed at transit passenger facilities¹ to provide assistance to passengers. Employees surveyed were of one of the following locations:

- Customer Service Representatives and public-facing Mobility Center Staff
- Central Station Transit Center
- Ed Pastor Transit Center
- Metrocenter Transit Center

¹ Facilities operated by the City of Phoenix or the City of Tempe

- Sunnyslope Transit Center
- Tempe Transportation Center

In total 33 respondents provided information about their experiences. Approximately 85% of those surveyed were employed at the Mobility and Customer Service Center.

When asked if representatives have had any requests for materials in another language, 70% responded yes they had encountered a request; see Figure 5. Of these, most interpretation or translation requests were for Spanish.

By cross-referencing the locations of respondents with responses that language assistance had been requested, all but one location had received requests: only Sunnyslope Transit Center reported having no foreign language encounters.

Languages requested were predominately Spanish (88%) followed by French (8%) and Russian (4%). See Figure 6 for a full breakdown of the languages requested.

Figure 5: Requests for Information or Materials in Another Language

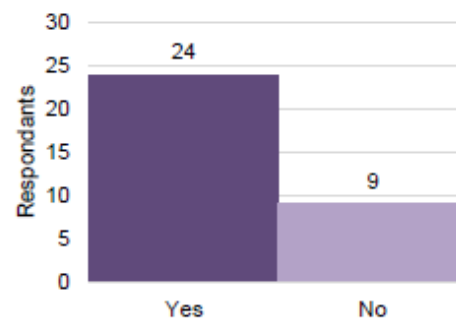
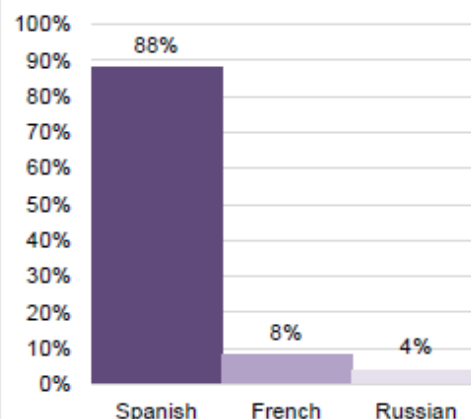
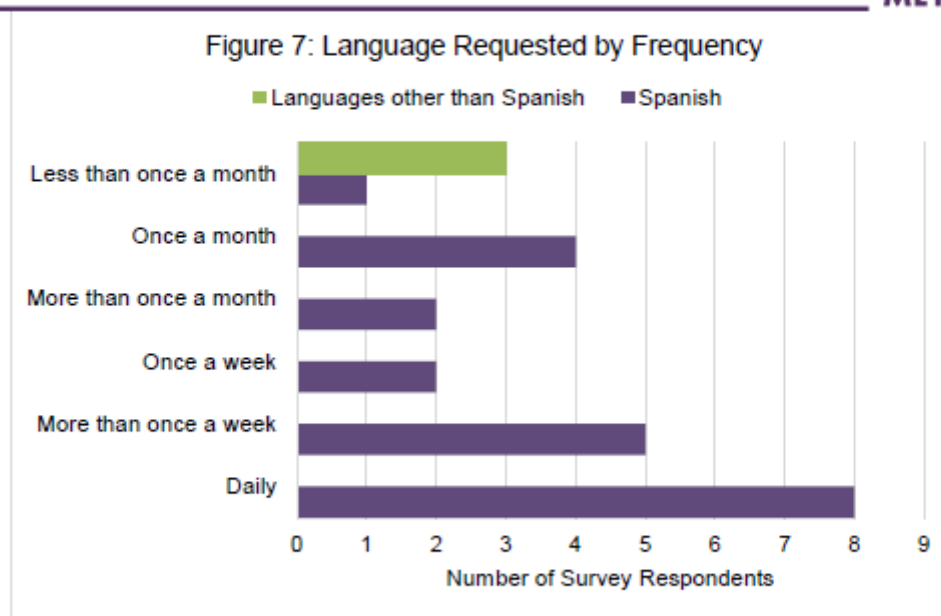


Figure 6: Requested Languages



These responses were categorized appropriately and cross-referenced with the language requested. See Figure 7 for a comparison. Spanish was much more frequently requested than any other language. Additionally, languages other than Spanish were requested at a less frequent rate.



This survey helped support that there are many languages encountered by transit professionals, yet Spanish is the most common and most frequent of those encountered.

Customer Service Interactive Voice Response (IVR) Call Log

The Customer Service Center updated the automated phone system mid-2014² to establish the Interactive Voice Response (IVR) feature. With this expansion, the new system is able to provide a log to which line callers have requested to be transferred. Available are six topic categories, each in English and Spanish for twelve options total. The topics available include:

- Americans with Disabilities Act (ADA)
- Customer Relations (CR)
- Light Rail
- Lost and Found
- Transit Information (TI)

This system allows Spanish-speaking callers to be automatically transferred to a bilingual representative reducing the time it takes to be served in the preferred language. Beyond being more convenient and helpful, this system also is more efficient by reducing the likelihood callers may be redirected to a bilingual representative. Currently, 13 bilingual customer service representatives are employed by Valley Metro. The new phone system prioritizes selection of Spanish calls received. Acknowledging that this is a truncated data

² Data available July 2014 through April 2015

set, Table 7 below shows the distribution of calls by option selected, followed by the sum of calls by language.

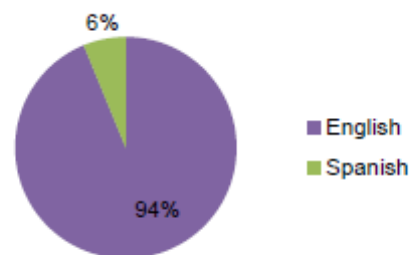
Table 7: Customer Service Call Log

	Total Calls	% of Total Calls
ADA-English	13,840	1.26%
ADA-Spanish	139	0.01%
CR-English	75,874	6.90%
CR-Spanish	371	0.03%
Light Rail-English	184	0.02%
Light Rail-Spanish	5	0.00%
Lost Found-English	5,073	0.46%
Lost Found-Spanish	22	0.00%
TI-English	936,408	85.16%
TI-Spanish	67,630	6.15%
English	1,031,379	93.8%
Spanish	68,167	6.2%
Total Calls	1,099,546	100.00%

Figure 8 shows a pie chart of the calls by language. Approximately 94% of calls were for English and 6% of calls were for Spanish. At the time of this report, 38 customer service representatives were currently on staff; of these, twelve are bilingual (32%).

When evaluating the customer service call logs, the bulk of calls received are through the English phone lines with a small portion (6%) selecting a Spanish option.

Figure 8: Customer Service Calls by Language



Transit Education Program

Valley Metro has a Transit Education program that presents information to various groups to teach about public transit, benefits of transit, and how to use the system. Staff members visit schools, businesses, social service agencies and present to new residents and refugee groups, senior citizens and persons with disabilities. Additionally, transit information and assistance is provided at community or special events including environmental fairs, transportation or vehicle days, career days, and more. This team also conducts general presentations by request to any group who wants to learn more about Valley Metro services. For more-comprehensive training, monthly sessions are held at Ability360 on the third Wednesday of the month. These sessions include a presentation, bus demo and ride and a light rail ride. Participants are issued an all-day pass for this mobility training.

Presentations are made to various refugee groups. Due to the varied backgrounds of the participants, the hosting organizations generally provide necessary interpreters. Valley Metro staff members have developed training materials that are mostly images to help bridge the language issues. The many Spanish speaking passengers are accommodated as much of the transit information is available in Spanish.

Website Translation

Apart from accessing information via transit employees whether by phone, email, in person or another method, many customers utilize the www.valleymetro.org website for information. During this time the website was equipped with the Google Translate feature, which allows translation into 90 languages. Users have translated the Valley Metro website into 36 different languages using this feature. Approximately 99% of sessions were utilizing the default English setting. The remaining 1% was comprised of 35 other languages. Table 8 provides an itemization of the languages translated and the percentage of sessions. Note that only languages comprising at least 0.01% of total sessions are included below; a full table of entries is available in Appendix C.

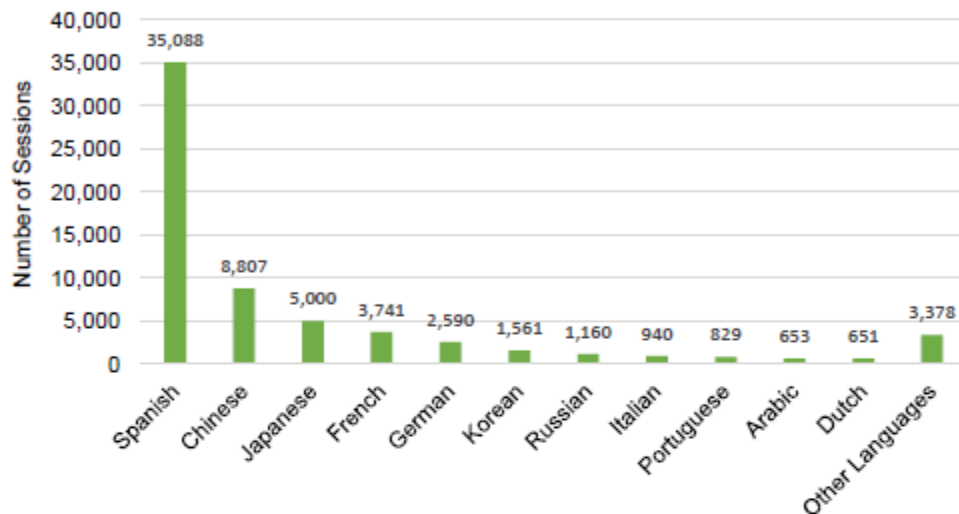
Table 8: Website Sessions by Language³

Language	Number of Sessions	Percent of Total Sessions
English	8,289,256	99.23%
Spanish	35,088	0.42%
Chinese	8,807	0.11%
Japanese	5,000	0.06%
French	3,741	0.04%
German	2,590	0.03%
Korean	1,561	0.02%
Russian	1,160	0.01%
Italian	940	0.01%
Portuguese	829	0.01%
Arabic	653	0.01%
Dutch	651	0.01%

Once again, Spanish was overwhelmingly the most utilized language with the website translation service comprising 0.42% of sessions, followed by Chinese (0.11%), Japanese (0.06%), French (0.04%), and German (0.03%). See Figure 9 below for a chart of the number of translated sessions by language.

³ Valley Metro. (2015). Language [Data file]. Available from <http://www.google.com/analytics/ce/mws/>

Figure 9: Number of Translated Website Sessions by Language



The website was translated to an additional 25 other languages that each comprises less than 0.01% of the sessions; collectively these viewings attribute to 0.04% of all sessions. These languages include:

- Bulgarian
- Catalan
- Croatian
- Czech
- Danish
- Farsi
- Finnish
- Greek
- Hebrew
- Hungarian
- Indonesian
- Latin
- Norwegian
- Polish
- Romanian
- Serbian
- Slovak
- Swedish
- Tagalog
- Thai
- Tonga
- Turkish
- Ukrainian
- Vietnamese

Persons around the region utilize the website to gather information in languages from around the world using the Google Translate feature. The majority of translated sessions are for the Spanish language (0.42%).

Furthermore, many documents uploaded to Valley Metro's website are translated into Spanish since they are disseminated as paper materials to the public. Individuals may utilize these documents without translating the website into Spanish, but rather use the Google Translate feature. Some of these documents include project updates, route maps and schedules, instructions and applications for a Reduced Fair ID, service change information, policies, brochures, and forms.

Conclusion

The Factor 2 analysis revealed that there is regular contact between the LEP population and Valley Metro personnel. The Transit Employee Survey conducted revealed that 70% of all respondents had encountered an LEP person; of those who had encountered a request for assistance in another language, 88% of respondents reported requests for Spanish. The Customer Service Call Log, though limited, showed that a mere 6% of customers utilized one of the six Spanish options. Information from the Transit Education team qualitatively identified Spanish as the main language group. Finally, translation data from the Valley Metro website indicated 0.77%% of sessions were translated; approximately half of which were translated to Spanish. The website was translated to 36 different languages. Overall, there is broad diversity within the Phoenix region that accesses regional transit services, however; these are predominately English and Spanish speaking individuals.

4.0 NATURE AND IMPORTANCE OF THE PROGRAM, ACTIVITY OR SERVICE PROVIDED (FACTOR 3)

The third step in the four-factor LEP needs assessment is an evaluation of the importance of Valley Metro services to persons with limited English proficiency. The first component of the Factor 3 analysis is to identify critical services. Next, input received from community organizations was used to identify ways to improve these services for LEP populations. The U.S. Department of Transportation (USDOT) "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons" (USDOT 2005) advises that:

The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed. The obligations to communicate rights to an LEP person who needs public transportation differ, for example, from those to provide recreational programming. A recipient needs to determine whether denial or delay of access to services or information could have serious or even life-threatening implications for the LEP individual . . . providing public transportation access to LEP persons is crucial. An LEP person's inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, education, or access to employment.

With assistance from Valley Metro's Community Relations and Marketing departments, a list of services provided was prepared and prioritized. The input from community organizations and LEP persons were incorporated to ensure views of the importance of services provided are adequately prioritized.

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4.1 Services Provided

In cooperation with Valley Metro's Communications and Operations departments, services currently provided to LEP persons were queried. Typically, materials in both English and Spanish are available on both bus and light rail services. Below is a list of available materials and services in Spanish that includes next bus and light rail specific services:

- Press Releases
- Public materials; including, but not limited to:
 - Route Scout (announcements on buses and light rail)
 - Ride Guide and Destinations Guide
 - Service changes materials
 - Transit book
 - Website
 - Project updates
 - Title VI forms
 - Large special events materials (e.g. Super Bowl public materials)
- Direct mailers or door hangers for targeted outreach
- Ticket vending machines (Spanish and Braille)
- Bilingual customer service staff
- Email List Serv Messages
- Bus specific services:
 - Car cards (on-board advertisements)
 - Bus signs (i.e. priority seating, caution signs, entry/exit, etc.)
 - Variable message sign that displays announcements on buses
- Light Rail specific services:
 - LRT vehicle signage including priority seating, manners, and other train information
 - VMS Announcements on vehicles and at stations
 - System maps and auxiliary information
 - Operator call boxes on trains
 - Emergency call box at stations
 - Safe place notices

Critical Services

Public transit is a key means of mobility for persons with limited English proficiency. Of those services identified above, a subset of critical services was prioritized to ensure that those services imperative to utilize Valley Metro public transportation options are available to all users.

Basic trip information is available both printed and electronically in Spanish, including service hours, tickets, trip planning, airport and transit connections, parking, bicycles, and services for persons with disabilities. Also available in Spanish is information regarding how to utilize transit, manners, priority seating, caution signs, and exit locations on vehicles. Ticket vending is available in both Spanish and Braille. Emergency notification measures are also translated, including audio VMS⁴ Announcements on vehicles (bus and rail), operator call boxes, emergency call boxes, and Safe Place notices.

Bilingual customer service representatives are available during regular call center hours. Representatives use the same procedures for comments and note that the inquiry was in Spanish so that a bilingual representative is assigned in any follow-up response if needed. Outside of customer service hours, the website is available for translation to most languages at any time. For public meetings and hearings, a Spanish translator is usually available; additional translators are available upon request or appropriate context. Typically, additional translation services requested are provided for American Sign Language through an on-call contract.

Community Outreach

Valley Metro conducted interviews with six community organizations that encounter various LEP populations. The organizations interviewed range from cultural adult centers to refugee services organizations.

Key findings from outreach effort:

- Public transportation is the main form of transportation to access jobs, medical appointments, social services, grocery shopping and school.
- Many of the organizations provide an orientation to transportation services and also provide free transit passes for employment searches.
- Two primary challenges with the public transportation system were voiced, which related to route location and schedule.
 - The schedule does not accommodate early morning or late night shifts.
 - The transit system does not travel to all locations, especially those on the outer reaches of the Phoenix metropolitan region.

⁴ Variable message signs
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Community Organizations Interviews

In 2015 Valley Metro interviewed six community organizations to garner insight on the use and role of Valley Metro services to the LEP populations within the Phoenix Metropolitan region. These six organizations include:

- o Catholic Charities
- o Friendly House
- o Refugee Focus
- o Arizona Immigration Refugee Services (AIRS)
- o Chinese Senior Center
- o Hope VI

Organizations were identified to ensure that a wide variety of cultural and language groups were reached over large service areas. These organizations indicated that they serve populations speaking a broad range of languages, including Spanish, Arabic, Somali, Chinese, Burmese and French.

Participating agencies were asked a series of questions from the FTA handbook "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons" (FTA 2007b). Organizations interviewed expressed needs of LEP populations regarding language assistance including:

- o **System Map Information:** LEP populations have expressed a difficulty in understanding and familiarizing themselves with system maps.
- o **On-Board Messaging:** LEP populations have expressed hardship in reading and understanding on-board signage/message boards as well as driver instructions.
- o **Transit Service Information:** LEP populations have expressed the desire for information, such as how to ride and fare payment information, be communicated in an understandable format. Symbols could be used to communicate messages to a wider audience. Also, offering orientation to these populations, through their respective agencies, would familiarize them with the transit system.

Valley Metro continues to make improvements in language assistance for the LEP population in the region in all areas including the three identified above.

5.0 CURRENT RESOURCES AVAILABLE AND THE COSTS TO PROVIDE LANGUAGE ASSISTANCE SERVICES (FACTOR 4)

The final step of the four-factor LEP analysis is an evaluation of the current and projected financial and personnel resources available to meet the current and future needs for

language assistance. The first component of the Factor 4 analysis was to identify current language assistance measures and associated costs. The next step was to determine what additional services may be needed to provide meaningful access. The USDOT "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons" (USDOT 2005) advises that:

A recipient's level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, 'reasonable steps' may cease to be reasonable where the costs imposed substantially exceed the benefits.

Valley Metro has a strong commitment to reducing the barriers encountered by LEP persons in accessing its services and benefits, to the extent resources are available. Valley Metro currently does not break down all cost expenditures related to providing language assistance. Valley Metro will evaluate how to consolidate its language assistance measures to deliver the most cost-effective services.

5.1 Current Measures and Costs

Costs incurred by Valley Metro for the language assistance measures currently being provided include:

- Translation of materials
- Printing, advertising, or other marketing costs
- Interpretation services
- Staff costs associated with Title VI efforts in adhering to language assistance measures

Typically, an amount is embedded into the project costs by activity (logged under printing or other direct expenses) for translation and production of any materials. Agency wide there is a standing on-call contract for any interpretation needs. Any production costs are included in printing and public meetings budgets. Furthermore, there are bilingual employees that provide intermittent language assistance needs as part of their other duties. Specifically, the Public Relations team has two employees (33% of the department staff) that are bilingual. These employees may be assigned to prepare press releases or media events with Spanish-speaking publications in addition to their typical duties. These soft costs are not tracked, though most of the formal interpretation services are contracted.

Interpreters are contracted for public meetings or hearings to ensure that any language assistance needs are met so that public relations staff can focus on facilitating the event.

All hearings are staffed with interpreters while public meetings are staffed depending on the anticipated number of persons reached and upon request. Valley Metro's current contract for interpreters at public meetings allow for approximately \$200 per meeting. Annually \$5,000-\$6,000 is spent for interpreters to staff meetings and public hearings for various projects and efforts. In addition, \$800-\$1,200 is spent annually for sign language interpreters at requested meetings and public hearings. Costs for translating and producing materials like meeting notices, display boards, news releases, and project update sheets are also budgeted annually; approximately \$14,000 - \$15,000. In total, approximately \$20,000 - \$25,000 is contracted out directly in support of language assistance services for interpreters, translation, and materials dependent on the projects and programs implemented each year.

Additional soft costs include other staff time utilized on an ad hoc or regular basis to provide translation or interpretive services. Over thirty percent of Public Relations and Customer Service Representatives are bilingual, servicing Spanish-speaking customers as well as English-speaking customers. Being bilingual is a preferred qualification when hiring customer service staff though not required. There are also bilingual employees that may assist on an informal, ad hoc basis to communicate with LEPs in other departments.

5.2 Cost-effective Practices

Valley Metro will continue to evaluate ways to improve the cost-effectiveness and the quality of its language services. Additional strategies for saving costs or improving quality may include developing internal and external language services, with the opportunity to coordinate across multiple agencies in the region. Current measures practiced to ensure services are cost effective include:

- o bilingual staff trained to act as interpreters and translators
- o shared customer service center and other information for combined translation and interpretation resources
- o some standardized common documents with transit and other public agencies
- o translated vital documents currently posted on <valleymetro.org>

Strategies for consolidating the regional language assistance measures to achieve efficiencies may include:

- o creating a one-stop LEP information center for Valley Metro employees
- o surveying Valley Metro staff to determine any additional existing multilingual resources
- o conducting outreach to various community organizations to secure volunteers for translation and interpretation services that are currently contracted or completed in-house
- o consolidating contract services for oral and written translation to secure the most cost-effective rates

Valley Metro continues to use qualified translators and interpreters to uphold the quality of language assistance measures. Valley Metro strives to provide basic informational training for volunteer staff on its language assistance measures.

5.3 Additional Services and Budget Analysis

Valley Metro is committed to reducing the barriers encountered by LEP persons in accessing its services to the extent funding is available. While Valley Metro currently does break down contracted cost expenditures related to providing language assistance, expenditures of efforts for translation and interpretation completed in-house are less well documented. As part of the Language Assistance Plan, Valley Metro will better monitor efforts in the future. Valley Metro will further evaluate how to consolidate its language assistance measures to deliver the most cost-effective services.

The information received from community organizations provided some insight on additional services that may ease access for LEP persons to regional transit services. The summary above portrays more insight of the interviews conducted. Services requested were centered on service expansions that included increased frequencies and later services at night. However, these would be greater improvements for consideration and prioritization of the system rather than specific services for LEP persons. Therefore, they were excluded here and assigned to the general public process for service requests.

Other requests included using more symbols to depict messaging and system routes. Audio messaging is also shown using VMS⁵ that could potentially show messaging in another language as well. The light rail system VMS currently shows messages in English and Spanish. Bus messaging is typically location data and in close proximity depending on stop locations. The feasibility and helpfulness of VMS translation should be evaluated.

As applicable, through the annual budget process, additional services requested or identified may be considered for implementation. In 2015, Valley Metro has shifted to a zero based budget that is approved by two appointed boards: Valley Metro Rail Board and the Valley Metro Regional Public Transportation Authority Board of Directors. Year by year the budget is developed as appropriate to the unique needs and demands of the agency at that point in time.

5.4 Projected Costs

Requests for added services include expanded symbols to understand how to use transit services, on-board messaging, and system map information. With a commitment to providing reasonable language assistance measures, Valley Metro will assess current symbolism used on vehicles, at station locations, and elsewhere to determine the sort of

⁵ LINK stations, light rail stations and vehicles are equipped with VMS announcements; most fixed route vehicles are also equipped with VMS capabilities

improvements that could be made so that the system is more easily understood visually. With expanded symbolism, it is expected that the need for enhancing the on-board messaging and system map information may be reduced. Furthermore, these could be incorporated into the regular updates of this information and signage. Biannually in coordination with the service changes, updated system maps are produced.

Other improvements would be considered after analyzing the staff costs, third party contract costs, and costs related to volunteer or community organization coordination. These would be evaluated in comparison with anticipated benefits to the LEP population. Other considerations may include operational issues and implementation time.

6.0 LANGUAGE ASSISTANCE MEASURES

Valley Metro is committed to full compliance with Title VI and Executive Order 13166 to provide meaningful access and reduce barriers to services and benefits for persons with limited English proficiency.

6.1 Current Language Assistance Measures

As discussed earlier in this Language Assistance Plan, Valley Metro currently provides both oral and written language assistance. Oral language assistance includes bilingual customer service representatives, speaking Spanish. Additionally, Spanish interpreters are available at public meetings; sign language and other language interpreters are available as requested. On vehicles and at stations, VMS announcements are also in Spanish.

Written Spanish language assistance includes signage, press releases, list serve messages, service change materials, Title VI complaint forms, policies, and procedures. Additional translation of some vital documents is provided, such as schedules, maps, ride and destination guides, route scouts, and more. Meeting notices and public input surveys at public meetings are translated. The website is equipped with the Google Translate feature, which allows translation into 5 languages (www.translate.google.com). Fare vending machines provide Spanish and Braille translations as well.

Notices to the public of language assistance measures are typically provided side-by-side an English version of the document. For example, Ride Guide documents are provided in both English and Spanish and are available together wherever disseminated. Where available, documents are commonly printed on both sides with an English version and a Spanish version on each side of the paper. When calling into the customer service line, the interactive voice response system will ask if Spanish is the preferred language automatically prior to being connected with a representative.

6.2 Staff Training

Specific policies and procedures for interacting with LEP persons are not formally adopted on a standalone basis. These policies and procedures are in essence those for all customers and have been embedded into multiple documents (including the Title VI Plan, trainings, instructions, etc.).

Using the customer service center as an example, Spanish calls are assigned directly to a Spanish-speaking representative through the phone system. In the customer assistance system a note is made that the customer speaks Spanish so that if the query is not able to be responded to immediately, any response is assigned to another bilingual representative. This training is implanted into general customer assistance staff training to ensure cost effective practices and efficient use of training resources. Title VI of the Civil Rights Act of 1964 is distributed to new employees and where applicable, employees are expected to know how to file discrimination claims based on race, color, or national origin. Additionally, there are related trainings available including quarterly Civil Rights Workshops, training sessions for conducting complaint investigations according to federal guidelines and streamlining the complaint investigative process.

Training for employees who regularly encounter the public may also include:

- Type of language services available,
- How staff and/or LEP customers can obtain these services,
- How to respond to LEP callers,
- How to respond to correspondence from LEP customers,
- How to respond to LEP customers in person, and
- How to document LEP needs.

Valley Metro continues to consider opportunities to provide quality services for LEP persons throughout the service area.

6.3 Future Language Assistance Services

With the development of subsequent Language Assistance Plans, it is expected that through the monitoring, evaluation, and update process that additional services continue to be identified and considered for feasibility of implementation. Valley Metro strives to serve LEP populations adequately with an equal opportunity to use transportation options available. Section 7 provides more information about the monitoring and update process of this plan.

7.0 MONITORING AND UPDATING THE LANGUAGE ASSISTANCE PLAN

Triennially Valley Metro will review, monitor, and update this LAP. Feedback from agency staff and community members will be accepted throughout the year at the email address: TitleVICoordinator@ValleyMetro.org. Additional community feedback may be elicited during the update process. Internal monitoring will be conducted using the template provided from the FTA handbook "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons" (FTA 2007b). Using this checklist periodically, stations, vehicles, customer service, community outreach, and public relations are monitored.

Using this information, changes may be made to the language assistance plan recognizing any cost implications and resources available. Depending on this evaluation, language assistance measures may be expanded, modified or eliminated based on their effectiveness.

As the transit service area is modified through service changes, the demographics served will be reviewed to ensure that those high concentrations of LEP persons are reflected accurately in an effort to provide language assistance measures to areas with expanded transit services.

Throughout the monitoring period, Valley Metro will continue to follow the recommendations and use the resources provided by Executive Order 13166, FTA Circular 4702.1B, the USDOT "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Person" (USDOT 2005), and the FTA handbook "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons" (FTA 2007b). Valley Metro will be better able to apply the DOT LEP guidance's four-factor framework and will continue to determine an appropriate mix of language assistance in the preparation of language assistance implementation plans.

APPENDIX A – FULL LIST OF LANGUAGES

ACS 2016 population by language and ability: cells shaded purple in this table meet either the 1,000 persons threshold or the 5% threshold of the total population of persons eligible to be served or likely encountered.

Language Category Group	Total Population	Percentage of Total LEP Population
All Languages Speaks English Less Than Very Well (LEP Population within Service Area)	791,547	-
Spanish	808,412	-
Spanish Speak English Very Well	528,695	-
Spanish Speak English Less Than Very Well	279,717	35.34%
French (Including Cajun)	10,704	-
French Speak English Very Well	8,109	-
French Speak English Less Than Very Well	2,595	0.33%
Haitian	357	-
Haitian Speak English Very Well	253	-
Haitian Speak English Less Than Very Well	104	0.0001 %
Italian	4,565	-
Italian Speak English Very Well	3,541	-
Italian Speak English Less Than Very Well	1,024	0.13%
Portuguese	2,335	-
Portuguese Speak English Very Well	2,180	-
Portuguese Speak English Less Than Very Well	155	0.0001 %
German	11,223	-
German Speak English Very Well	10,177	-
German Speak English Less Than Very Well	1,046	0.13%
Yiddish, Pennsylvania Dutch, or Other West Germanic	1,605	-
Yiddish Speak English Very Well	1,605	-
Yiddish Speak English Less Than Very Well	0	0.00%
Greek	1,140	-
Greek Speak English Very Well	1,052	-
Greek Speak English Less Than Very Well	88	0.0001 %
Russian	3,153	-
Russian Speak English Very Well	2,578	-
Russian Speak English Less Than Very Well	575	0.0007 %
Polish	5,665	-
Polish Speak English Very Well	4,083	-
Polish Speak English Less Than Very Well	1,582	0.19%
Serbo-Croatian	5,431	-
Serbo-Croatian Speak English Very Well	4,228	-
Serbo-Croatian Speak English Less Than Very Well	1,203	0.15%

Ukrainian or Other Slavic	3,652	-
Other Slavic Speak English Very Well	2,860	-
Other Slavic Speak English Less Than Very Well	792	0.10%
Armenian	474	-
Armenian Speak English Very Well	209	-
Armenian Speak English Less Than Very Well	265	0.0003%
Farsi or Dari	6,866	-
Persian Speak English Very Well	4,102	-
Persian Speak English Less Than Very Well	2,764	0.35%
Gujarati	3,044	-
Gujarati Speak English Very Well	2,366	-
Gujarati Speak English Less Than Very Well	678	0.0008%
Hindi	10,858	-
Hindi Speak English Very Well	8,868	-
Hindi Speak English Less Than Very Well	1,990	0.25%
Urdu	2,026	-
Urdu Speak English Very Well	1,812	-
Urdu Speak English Less Than Very Well	214	0.0003%
Nepali, Marathi, or Other Indic	3,675	-
Other Indic Speak English Very Well	2,405	-
Other Indic Speak English Less Than Very Well	1,270	0.16%
Punjabi	1,462	-
Punjabi Speak English Very Well	808	-
Punjabi Speak English Less Than Very Well	654	0.0008%
Bengali	1623	-
Bengali Speak English Very Well	1022	-
Bengali Speak English Less Than Very Well	601	0.0008%
Other Indo European	10,187	-
Other Indo European Speak English Very Well	6,915	-
Other Indo European Speak English Less Than Very Well	3,272	0.41%
Chinese	25,847	-
Chinese Speak English Very Well	12,518	-
Chinese Speak English Less Than Very Well	13,329	1.68%
Japanese	3,604	-
Japanese Speak English Very Well	2,677	-
Japanese Speak English Less Than Very Well	927	0.12%
Korean	6,412	-
Korean Speak English Very Well	3,160	-
Korean Speak English Less Than Very Well	3,252	0.90%
Vietnamese	18,703	-
Vietnamese Speak English Very Well	8,215	-
Vietnamese Speak English Less Than Very Well	10,488	1.33%
Khmer	1,559	-
Khmer Speak English Very Well	736	-

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Khmer Speak English Less Than Very Well	823	0.00%
Telugu	6,379	
Telugu Speak English Very Well	5,594	
Telugu Speak English Less Than Very Well	785	
Tamil	3,872	
Tamil Speak English Very Well	3,374	
Tamil Speak English Less Than Very Well	498	
Malayalam, Kannada, or other Dravidian languages	2,988	
Malayalam, Kannada, or other Dravidian languages Speak English Very Well	2,644	
Malayalam, Kannada, or other Dravidian languages Speak English Less Than Very Well	344	
Thai, Lao, or Other Tai-Kadai Languages	2,848	-
Thai, Lao, or Other Tai-Kadai Languages Speak English Very Well	1,893	-
Thai, Lao, or Other Tai-Kadai Languages Speak English Less Than Very Well	955	0.26%
Other Asian	3,838	-
Other Asian Speak English Very Well	2,308	-
Other Asian Speak English Less Than Very Well	1,530	0.09%
Tagalog (Including Filipino)	18,812	-
Tagalog (Including Filipino) Speak English Very Well	13,344	-
Tagalog (Including Filipino) Speak English Less Than Very Well	5,468	1.21%
Ilocano, Samoan, Hawaiian, or other Austronesian languages	6,677	-
Ilocano, Samoan, Hawaiian, or other Austronesian languages Speak English Very Well	5,377	-
Ilocano, Samoan, Hawaiian, or other Austronesian languages Speak English Less Than Very Well	1,300	0.38%
Navajo	11,895	-
Navajo Speak English Very Well	10,812	-
Navajo Speak English Less Than Very Well	1,083	0.36%
Other Native North American	4,099	-
Other Native North American Speak English Very Well	3,776	-
Other Native North American Speak English Less Than Very Well	323	0.11%
Yoruba, Twi, Igbo, or other languages of Western Africa	4,071	-
Yoruba, Twi, Igbo, or other languages of Western Africa Speak English Very Well	3,215	-
Yoruba, Twi, Igbo, or other languages of Western Africa Speak English Less Than Very Well	856	0.07%
Arabic	25,913	-
Arabic Speak English Very Well	15,535	-
Arabic Speak English Less Than Very Well	10,378	1.46%
Hebrew	1,925	-
Hebrew Speak English Very Well	1,612	-
Hebrew Speak English Less Than Very Well	313	0.08%
Amharic, Somali, or other Afro-Asiatic languages	7,343	-
Amharic, Somali, or other Afro-Asiatic languages Speak English Very Well	4,348	-
Amharic, Somali, or other Afro-Asiatic languages Speak English Less Than Very Well	2,995	0.98%
Swahili or other languages of Central, Eastern, and Southern Africa	6,764	
Swahili or other languages of Central, Eastern, and Southern Africa Speak English Very Well	3,180	

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Swahili or other languages of Central, Eastern, and Southern Africa Speak English Less Than Very Well	3,584	
Other Languages	2,321	-
Other Languages Speak English Very Well	1,793	-
Other Languages Speak English Less Than Very Well	528	0.66%

APPENDIX B – TRANSIT EMPLOYEE INSTRUMENT



Language Assistance Program Survey 2018

*-denotes required question

*Name: _____

*Email Address: _____

*1. Location

- Customer Service Representatives (electronic, phone, email)
- Central Station Transit Center
- Ed Pastor Transit Center
- Metrocenter Transit Center
- Sunnyslope Transit Center
- Tempe Transportation Center

*2. Have you had any requests for information or materials in other languages?

- Yes
- No

If yes, please complete the remainder of the survey.

If no, thank you for your participation.

3. What language(s) have been requested?

4. How often do you receive requests?

- More than once a week
- Once a week
- More than once a month
- Once a month
- Once every three months
- Once every six months
- Once a year
- Other:

APPENDIX C – WEBSITE SESSIONS BY LANGUAGE

Language	Number of Sessions	Percent of Total Sessions
Total	21,628,079 ⁶	100%
English	21,392,285	98.91%
Other Languages	222,177	1.03%
Language	Number of Sessions	Percent of Non-English Sessions
Spanish	123,377	0.57%
Chinese	26,684	0.12%
Japanese	13,950	0.06%
German	11,502	0.05%
French	10,316	0.05%
Korean	7,496	0.03%
Portuguese	6,225	0.03%
Italian	3,638	0.02%
Russian	3,303	0.02%
Dutch	2,576	0.01%
Arabic	1,822	0.01%
Swedish	1,483	0.01%
Turkish	1,221	0.01%
Polish	1,127	0.01%
Czech	839	0.00%
Norwegian	771	0.00%
Danish	726	0.00%
Vietnamese	670	0.00%
Hebrew	645	0.00%
Hungarian	645	0.00%
Finnish	531	0.00%
Thai	335	0.00%
Slovak	309	0.00%
Greek	293	0.00%
Romanian	232	0.00%
Indonesian	217	0.00%
Bulgarian	173	0.00%
Catalan	122	0.00%
Croatian	110	0.00%
Slovenian	101	0.00%
Persian	93	0.00%
Filipino	89	0.00%
Serbian	84	0.00%
Afrikaans	76	0.00%
Lithuanian	67	0.00%
Ukrainian	66	0.00%
Latvian	53	0.00%
Icelandic	31	0.00%

⁶ There were 13,829 entries included that did not have a valid ISO language code associated with the website visit; thus the sum of languages will fall short.

Estonian	24	0.00%
Marathi	16	0.00%
Kanuri	15	0.00%
Hindi	10	0.00%
Tagalog	10	0.00%
Azerbaijani	8	0.00%
Breton	8	0.00%
Malay	8	0.00%
Pushto	8	0.00%
Telugu	8	0.00%
Walloon	6	0.00%
Bengali	5	0.00%
Esperanto	5	0.00%
Macedonian	5	0.00%
Navajo	5	0.00%
Albanian	4	0.00%
Malay	4	0.00%
Acoli	3	0.00%
Georgian	3	0.00%
Kannada	3	0.00%
Tonga	3	0.00%
Armenian	2	0.00%
Bosnian	2	0.00%
Galician	2	0.00%
Gujarati	2	0.00%
Irish	2	0.00%
Javanese	2	0.00%
Malayalam	2	0.00%
Turkmen	2	0.00%
Aymara	1	0.00%
Welsh	1	0.00%

NON-ELECTED COMMITTEES MEMBERSHIP TABLE

The City of Mesa does not have transit-related, non-elected planning boards, advisory councils, committees, or similar bodies, where the membership of which is selected by the City. Below is the table that the City of Mesa would use in the event that committees and councils were selected by City of Mesa. The City would strongly encourage participation of minorities on such board, councils and committees.

Table Depicting Membership of Committees, Councils, Broken Down by Race

Body	Caucasian	Latino	African American	Asian American	Native American
Population	<i>To be completed when applicable.</i>				
Non-elected Board					
Advisory Council					
Committees					

☒ The City of Mesa does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

MONITORING FOR SUBRECIPIENT TITLE VI COMPLIANCE

The City of Mesa does not have any FTA sub recipients at this time and does not anticipate expanding to include sub recipients. In the case that the City of Mesa does expand and begin contracting with sub recipients, the following agreements will be used and additional measures will be evaluated to ensure compliance:

Contractor & Sub Contractor Agreements

All subcontractors and vendors who receive payments from the City of Mesa where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended. Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract. Below is an example of the language use:

During the performance of this contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

- (1) **Compliance with Regulations:** The contractor shall comply with the Regulation relative to nondiscrimination in federally-assisted programs of the Department of Transportation (hereinafter, "DOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this contract.*
- (2) **Nondiscrimination:** The contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, national origin, or sex in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.*
- (3) **Solicitations for Subcontractors, Including Procurements of Materials and Equipment:** In all solicitations either by competitive bidding or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials or leases of equipment, each potential subcontractor or supplier shall be notified by the contractor of the contractor's obligations under this contract and the Regulations relative to nondiscrimination on the grounds of race, color, national origin, or sex.*
- (4) **Information and Reports:** The contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the City of Mesa, the Arizona Department of Transportation or the Federal Highway Administration*

to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish this information the contractor shall so certify to the City of Mesa, the Arizona Department of Transportation, or the Federal Highway Administration as appropriate, and shall set forth what efforts it has made to obtain the information.

*(5) **Sanctions for Noncompliance**: In the event of the contractor's noncompliance with the nondiscrimination provisions of this contract, the City of Mesa shall impose such contract sanctions as it or the Arizona Department of Transportation or the Federal Special Provisions Highway Administration may determine to be appropriate, including, but not limited to:*

- a) withholding of payments to the contractor under the contract until the contractor complies, and/or*
- b) cancellation, termination or suspension of the contract, in whole or in part.*

*(6) **Incorporation of Provisions**: The contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto.*

The contractor shall take such action with respect to any subcontract or procurement as the City of Mesa, the Arizona Department of Transportation or the Federal Highway Administration may direct as a means of enforcing such provisions including sanctions for non-compliance: Provided, however, that, in the event a contractor becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such direction, the contractor may request the City of Mesa or the Arizona Department of Transportation to enter into such litigation to protect the interests of the City of Mesa or the Arizona Department of Transportation, and, in addition, the contractor may request the United States to enter into such litigation to protect the interests of the United States.

☒ The City of Mesa does NOT monitor sub recipients for Title VI compliance.

TITLE VI FACILITY EQUITY ANALYSIS

A sub recipient planning to acquire land to construct certain types of facilities must not discriminate on the basis of race, color, or national origin, against persons who may, as a result of the construction, be displaced from their homes or businesses. “Facilities” in this context does not include transit stations or bus shelters, but instead refers to storage facilities, maintenance facilities and operation centers.

The City of Mesa has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements were developed since the last Title VI update was provided in 2015.

REGIONAL SYSTEM WIDE STANDARD & POLICIES

The City of Mesa follows a multiple phase Transit Standards and Performance Measures (TSPM) guided by Valley Metro. These standards fall in line with federal and state requirements. The TSPM help manage our regionally funded transit services and investments like bus stops, park-and-ride facilities and future light rail destinations. The following three phase approach is posted on Valley Metro's Website².

Phase I

The first phase in the plan establishes service provision goals to guide the development of Valley Metro's TSPM. This phase established standardized transit service types, operating characterized for each service type and bus stop spacing standards.

Phase II

The second phase focuses on the development of transit service performance measures, transit service thresholds, application principles and implementation standards for new service.

Phase III

The third phase establishes standard and performance measures for regionally funded transit vehicles such as buses and light rail vehicles and transit facilities including bus stops and park-and-ride facilities.

² <https://www.valleymetro.org/transit-standards-and-performance-measures>

Distribution of Transit Amenities

Transit Amenities refer to fixed items of comfort and convenience available to the general riding public such as shelter placement, signage, benches and trash can placement. Generally, individual municipalities are responsible for the provision, monitoring and maintenance of shelters, bus stop signs, benches and other amenities. The following sections briefly summarize the City's policies or standards that govern the deployment of amenities on the City's transit system. Mesa policy is to review and ensure amenities are placed within the City without regard to race, color, national origin, or income considerations.

Shelter Placement: City of Mesa continues to use ridership as the primary criterion for determining shelter placement. (Shelters should be provided at all stops which serve 100 or more boarding riders during the course of a typical weekday). A variety of bus shelter shapes and sizes are available to address site restrictions, opportunities, and ridership needs.

The following criteria should be used as a guide in the placement of customer shelters:

- Shelters should be placed at all established park and ride lots.
- A shelter should "aesthetically fit" its surroundings where economically feasible

- Shelters can be standardized to some degree for possible cost effectiveness via quantity purchase prices, for maintenance purposes or to maintain aesthetic continuity
- Shelters should be installed at major transfer points between routes
- Shelters should include amenities such as display space for route maps and schedules, benches, trash cans and lighting.

Signage: All bus stops shall feature signs mounted in a uniform manner to identify the area as a stop and provide readable and accurate information.

Benches: Ridership figures are used to determine seating requirements while the built environment often dictates seating options.

Trash Can Placement: At a minimum, trash cans are placed at sheltered bus stops with high ridership and must not infringe upon the ADA pad or pedestrian pathway.

Transit amenities are locally funded and fall under the responsibility of the jurisdictions within which they are sited. The service standard elements and level of service assessments will be the responsibility of the individual municipalities. If, at any time during the 2019 to 2021 period, the City places transit amenities within its jurisdictions, the City will follow the pertinent Valley Metro Regional System Wide Standards and Policies as follows:

Valley Metro Regional System-Wide Service Standards and Policies

Overview

Valley Metro, as the regional transit authority, operates the majority of transit service in Maricopa County with the exception of the City of Phoenix, City of Glendale's local circulator and City of Scottsdale's downtown trolley. Valley Metro coordinated with the City of Phoenix to develop a Regional System-Wide Service Standards and Policies that applies to all services that both entities provide, but they can be also adopted by the cities of Glendale and Scottsdale. Valley Metro also operates the region's light rail transit system and has developed a separate set of System-Wide Standards and Policies for light rail. Valley Metro, in coordination with the City of Mesa, is currently constructing a light rail extension further into their community. In Tempe, Valley Metro is coordinating with the City to complete the design for a streetcar project and are currently relocating utilities. In addition, Valley Metro is coordinating with the City of Phoenix for the final design of three light rail extensions further into their community. All will adhere to the standards and policies outlined below.

Regional Service Policies for Bus Service

The regional service policies are meant to ensure that transit amenities are distributed fairly throughout the system and vehicles are properly assigned on a route-by-route basis.

1.0 VEHICLE ASSIGNMENT

1.1 Service Policy

Vehicle assignment refers to the process by which transit vehicles are placed into revenue service throughout the transit system. Vehicles will be assigned to the various depots such that the average age of the fleet serving each depot does not exceed 12 years. Low-floor buses are deployed on frequent service and other high-ridership routes, so these buses carry a higher share of ridership than their

numerical proportion of the overall bus fleet. Low-floor buses are also equipped with air conditioning and an automated stop announcement system.

Bus assignments take into account the performance characteristics of service types, and vehicle assignments are matched to the demand (vehicle with more capacity are assigned to service types with higher ridership). Note that some service types have specific vehicle types. Other bus assignments also take into consideration branded service, such as Express/RAPID routes, that has specific sub fleet assignment to it.

1.2 Service Policy Elements

- Vehicle age
- Vehicle assignment records (dispatch bus pullout sheets). The contractor dispatch staff assigns buses daily based on historical knowledge of the route.

1.3 Level of Service Assessment

- Calculate the average age of the entire bus fleet.
- Calculate the average age of the buses assigned to serve minority and low-income routes and for non-minority and non-low-income routes.
- Assessment compares minority to non-minority routes and low income to non-low-income routes.

2.0 DISTRIBUTION OF TRANSIT AMENITIES

Transit amenities are locally funded and fall under the responsibility of the jurisdictions within which they are sited. The service standard elements and level of service assessments will be the responsibility of the individual municipalities. Valley Metro does, however, provide support in the planning processes of these facilities.

Regional Service Standards for Bus Service

The regional service standards are quantitative performance standards meant to ensure that fixed route services are fairly applied throughout Valley Metro's service area.

1.0 VEHICLE LOAD

1.1 Vehicle Load Standard

Vehicle load (also known as maximum load) is the ratio of the number of passengers on a vehicle to the number of seats. Valley Metro and the City of Phoenix operates a number of local fixed routes, express routes and circulator service in the region with a number of different bus configurations containing different numbers of seats and how many people can stand on the bus. The vehicle load threshold is, therefore, broken down to the three main types of service that are based on the average number of seats and the number of standing passengers. The load thresholds are identified below:

Local Fixed Route Service (as defined in Transit Standards and Performance Measures [TSPM] are Local Bus, Key Local Bus, Limited Stop All-Day)

Two bus types provide local fixed service in the region—a standard 40-foot bus and a 60-foot articulated bus.

A 40-foot bus contains 36 seats and can comfortably hold 54 passengers. The vehicle load threshold for peak service is expressed as a ratio of 1.50. This means that all seats are filled and there are 18 standees per bus.

The 60-foot articulated bus contains 55 seats and can comfortably hold 85 passengers. The vehicle load threshold for peak service is expressed as a ratio of 1.50. This means that all seats are filled and there are 30 standees per bus.

Commuter Express/RAPID Service/Limited Stop Peak⁴

Two bus types provide Express service in the region—a standard 40-foot bus and a 60-foot articulated bus.

A 40-foot bus contains 36 seats and can comfortably hold 54 passengers. The vehicle load threshold for peak service is expressed as a ratio of 1.50. This means that all seats are filled and there are 18 standees per bus.

The 60-foot articulated bus contains 55 seats and can comfortably hold 85 passengers. The vehicle load threshold for peak service is expressed as a ratio of 1.50. This means that all seats are filled and there are 30 standees per bus.

Community Circulator Service

The buses used for the circulators can, on average, seat 17 passengers and comfortably hold 23 passengers. The vehicle load threshold for all day service (such as the BUZZ, ZOOM, MARY, ALEX, SMART, DASH and Orbits) is expressed as a ratio of 1.35. This means that all seats are filled and there are 6 standees per bus. All buses providing this service are ADA accessible.

Rural Connector

The buses used for the rural connectors can, on average, seat 32 passengers and comfortably hold 38 passengers. The vehicle load threshold for all day service is expressed as a ratio of 1.18. This means that all seats are filled and there are 9 standees per bus. All buses providing this service are ADA accessible.

1.2 Vehicle Load Data Collection

To determine the vehicle load, the following data is gathered:

- Annual random ride check samples or APC data
- Each ride check is one trip on a route
- AM Peak direction samples Monday through Friday
- PM Peak direction samples Monday through Friday
- Samples collected annually throughout the year

1.3 Vehicle Load Assessment

Using the data above, the following analysis is done to determine the vehicle load:

Local Fixed Route Service (Local Bus, Key Local Bus, Limited Stop All-Day)

- Determine number of minority and non-minority routes that have a maximum load ratio of less than 1.50 for AM and PM peak times and calculate the percentages
- Repeat the calculations for low-income and non-low-income routes
- Compare level of service between minority and non-minority routes and low-income and non-low-income routes

Commuter Express/RAPID Service/Limited Stop Peak²

- Determine number of minority and non-minority routes that have a maximum load ratio of less than 1.50 for AM and PM peak times and calculate the percentages
- Repeat the calculations for low-income and non-low-income routes
- Compare level of service between minority and non-minority routes and low income and non-low-income routes

Community Circulator Service

- Determine number of minority and non-minority routes that have a maximum load ratio of less than 1.0 for AM and PM Non-Peak times and calculate the percentages
- Determine number of minority and non-minority routes that have a maximum load ratio of less than 1.40 for AM and PM peak times and calculate the percentages
- Repeat the calculations for low-income and non-low-income routes
- Compare level of service between minority and non-minority routes and low income and non-low-income routes

Rural Connector

- Determine number of minority and non-minority routes that have a maximum load ratio of less than 1.35 for all trip times and calculate the percentages
- Repeat the calculations for low-income and non-low-income routes
- Compare level of service between minority and non-minority routes and low income and non-low-income routes

2.0 VEHICLE HEADWAY

Vehicle headway standards are based on the TSPM³ for regionally funded routes. Transit service standards and performance measures represent rules and guidelines by which the performance of the region's transit system may be evaluated, and decisions regarding transit investments may be prioritized and measured.

2.1 Vehicle Headway Standard

Vehicle headway is the time interval between two vehicles traveling in the same direction on the same route. Table 6 shows the vehicle headway standards for the region.

Table 6 – Vehicle Headway Standards

Service Type	Minimum Headway or Daily Trips	Minimum Span (Week/Sat/Sun)	Minimum Operating Days
Rural Connector	4 trips inbound/4 trips outbound	NA	Mon–Fri
Community/Circulator	30 min	12 hrs/0 hrs/0 hrs	Mon–Fri
Local Bus	30 min*	16 hrs/14 hrs/12 hrs	Mon–Sun

² Note that Commuter Express/RAPID Services minority and low-income routes are determined by stop location (rather than full route) since the majority of these routes travel from a park-and-ride location to a major employment center along a freeway or other corridor without making stops.

³ More information about this effort available here:

http://www.valleymetro.org/publications_reports/transit_standards_performance_measures

Service Type	Minimum Headway or Daily Trips	Minimum Span (Week/Sat/Sun)	Minimum Operating Days
Key Local Bus	15 min peak/30 min base*	16 hrs/14 hrs/12 hrs	Mon–Sun
Limited Stop Peak	4 trips AM/4 trips PM	NA	Mon–Fri
Limited Stop All-Day	Headways same as LRT, up to 2X peak	16 hrs/14 hrs/12 hrs (same as LRT)	Mon–Fri
Commuter Express	4 trips AM/4 trips PM	NA	Mon–Fri
Light Rail Transit	12 min peak/20 min base	18 hrs/14 hrs/12 hrs	Mon–Sun

*60 min early morning and late night

For rural connector routes, limited stop peak and commuter express routes, service availability is applied based on a number of daily trips rather than frequency.

2.2 Vehicle Headway Data Collection

Local Fixed Route Service (Local Bus, Key Local Bus, Limited Stop All-Day)

- Measure standard using published fixed route service schedules (no Express, RAPID, Limited Stop Peak or circulator routes)

Commuter Express/RAPID Service/Limited Stop Peak

- Measure standard using published Express, RAPID and Limited Stop Peak service schedules

Circulator Service

- Measure standard using published circulator route service schedules

Rural Connector

- Measure standard using published Rural Connector service schedules

2.3 Vehicle Headway Assessment

- Determine number of minority and non-minority routes that have a peak headway meeting or exceeding the headway standard for each service type and calculate the percentages
- Repeat the calculations for low-income and non-low-income routes
- Compare level of service between minority and non-minority routes and low-income and non-low-income routes

3.0 ON TIME PERFORMANCE

3.1 On Time Performance Standard

On time performance is a measure of bus runs for a particular route completed as scheduled. The service standard threshold is defined as 90 percent or better of all trips on a particular route completed within the allowed on-time window (no more than 0 minutes early and 5 minutes 59 seconds late, compared to scheduled arrival/departure times at published time points).

3.2 On Time Performance Data Collection

- Measure standard using Valley Metro operated local fixed routes
- Report data on a monthly basis
- Use Vehicle Management System (VMS) data. VMS data is not available for the circulators GUS I, II, III and Tempe's Orbits

3.3 On Time Performance Assessment

- Determine number of minority and non-minority routes that have an on-time performance of 90 percent or better on an annual basis and calculate the percentages
- Repeat the calculations for low-income and non-low-income routes
- Compare level of service between minority and non-minority routes and low-income and non-low-income routes

4.0 SERVICE AVAILABILITY

Transit amenities are locally funded and fall under the responsibility of the jurisdictions within which they are sited. The service availability and service availability assessments are the responsibility of the individual municipalities.

4.1 Service Availability Standard

Service availability is measured by the distribution of bus stops within the regional service area that afford residents accessibility to transit. The service standard is consistent with the TSPM standard and has the following thresholds for each service:

Local Bus and Key Local Bus

- Bus stops are placed approximately 0.25 mile apart. Where development patterns are of higher or lower density than typical within the region, an exception to the recommended stop spacing standard may be warranted

Limited Stop Peak and Limited Stop All-Day

- Bus stops are placed approximately one mile apart. Where development patterns are of higher or lower density than typical within the region, an exception to the recommended stop spacing standard may be warranted

Express/RAPID Service

- Express/RAPID stops are strategically placed and are generally located at park-and-ride facilities
- No more than four inbound Express bus stops
- Outbound Express/RAPID stops behave more like a local service and will pick up or drop off passengers more frequently

Community Circulator Service

- Bus stops within the designated stop area of each circulator route are placed no more than 0.25 mile apart
- In the flag stop zone area of each circulator route, passengers can be picked up anywhere along the route

4.2 Service Availability Data Collection

- Bus stop database

4.3 Service Availability Assessment

- Identify number of bus stop spacing gaps on each route
 - Calculate the number of bus stop spacing gaps that do not meet the standard as a percentage of the total number of bus stop spacing gaps on a given route

- Compare percentage of bus stop location gaps that do not meet the standard by minority versus non-minority routes and low-income versus non-low-income routes

Regional Service Policies for Light Rail Service

1.0 VEHICLE ASSIGNMENT

1.1 Service Policy

The Vehicle Assignment service policy generally addresses the equitable assignment of transit vehicles to depots and routes throughout the entire transit system in terms of minority and low-income populations compared to non-minority and non-low income populations. This policy measures whether transit vehicles are equitably assigned considering the age of the vehicle, type of fuel used, number of seats in the vehicle and whether or not the vehicle is high or low floor. However, Valley Metro has one light rail route with a single type of fleet. Valley Metro's light rail fleet consists of 50 vehicles of the same design, passenger load, amenities and age. The light rail vehicles are considered low floor at each of the four doors to allow level boarding at each of the 35 light rail stations. Each light rail vehicle is equipped with air conditioning and heating, automated stop announcements, a bike rack that holds four bikes and folding seats to accommodate four wheel chairs.

1.2 Service Assessment

All vehicles put into service each day run along the one light rail route and have the same amenities and quality for all passengers riding the system. Until new routes are added to the system that contain different vehicles, no assessment of vehicle assignment is warranted.

2.0 DISTRIBUTION OF TRANSIT AMENITIES

2.1 Service Standard

Transit amenities refer to items of comfort and convenience available to the general riding public. Valley Metro's *Design Criteria Manual* includes a chapter on light rail station design. This chapter provides standards for the design of each station and the amenities that will be incorporated into each station. Each of the 28 stations within Valley Metro's current light rail system contain the following amenities:

- Shading and climate protection
- Seating
- Lighting
- Drinking fountain
- Trash receptacles
- Platform information maps
- Emergency call boxes
- Closed circuit television cameras
- Public address system/variable message boards
- Ticket vending machines
- Double loading light rail station platforms (except where adequate pedestrian crossing is not available)

In addition, each station has a securable rack for four bicycles located at street intersections adjoining the station entrances. Although the *Design Criteria Manual* has been developed as a set of general guidelines for planning and design of the light rail system, deviations from these accepted criteria may be required in specific instances based on community characteristics or other requests. Typically, new development is compliant with the *Design Criteria Manual*.

2.2 Service Assessment:

Valley Metro will conduct field observations once a year to determine if each station still contains the following amenities in good operational order:

- Information maps and public announcements at each station are in English and Spanish
- Ticket vending machines at each station entrance
- Seating
- Waste receptacles
- Bike racks
- Lighting

Regional Service Standards for Light Rail Service

1.0 VEHICLE LOAD

1.1 Vehicle Load Standard

Vehicle Load (also known as maximum load) is the ratio of the number of passengers on a vehicle to the number of seats. For the existing light rail system (26-mile fixed route rail service), a single light rail vehicle contains 66 seats and can hold comfortably 140 passengers. The vehicle load threshold for peak service for comfortable accommodation is expressed as a ratio of 2.12. This means that all seats are filled and there are 74 standees per train.

A single vehicle has a maximum capacity (crush factor) of 226 passengers. The vehicle load threshold for peak service for maximum capacity is expressed as a ratio of 3.42. This means that all seats are filled and there are 160 standees per train.

Valley Metro has the ability to operate consists of up to three light rail vehicles.

1.2 Vehicle Load Data Collection

Average weekday loads on the light rail will be determined by the following:

- Ride check the light rail route using the APC data
- AM in the peak direction (6–9 a.m.) Monday through Friday
- PM in the peak direction (3–6 p.m.) Monday through Friday

Samples will be collected semi-annually during the months of April and November to determine if the standard vehicles load is exceeded.

1.3 Vehicle Load Assessment

Valley Metro currently has one light rail line operating in the region with all vehicles being exactly the same. Therefore, the data collected above will be used to determine the vehicle load.

2.0 VEHICLE HEADWAY

2.1 Vehicle Headway Standard

Vehicle headway is the time interval between two vehicles traveling in the same direction on the same line. Table 6 shows the vehicle headway thresholds for the light rail system.



Service operates regionally every 12 minutes in the peak hours (6 a.m.–7 p.m.) each weekday, every 20 minutes in the off peak hours (4 a.m.–6 a.m. and 7 p.m.–12 a.m.) each weekday and every 20 minutes all day on weekends.

Table 6 – Vehicle Headway Standards

Service Type	Headway - Peak	Headway – Off Peak
Weekday	12 minutes	20 minutes
Saturday	20 minutes	
Sunday / Holiday	20 minutes	

2.2 Vehicle Headway Data Collection and Service Assessment

Valley Metro currently has one light rail route under operation with 28 stations and the headway is monitored on a daily basis. As new extensions are added to the current light rail ends of line (extending light rail from current end-of-line at Sycamore and Montebello) the service assessment will be for this route in its entirety. As new routes to the system are brought into service, the service assessment will be by individual routes. Headways are monitored at the Operations Center and will be assessed by the following:

- AM in the peak direction (6–9 a.m.) weekdays
- PM in the peak direction (3–6 p.m.) weekdays
- AM in the peak direction (6–9 a.m.) weekends
- PM in the peak direction (3–6 p.m.) weekends

3.0 ON TIME PERFORMANCE

3.1 On Time Performance Standard

On time performance is a measure of a light rail trip (end-of-line Mesa Drive station to the end-of-line 19th Ave/Dunlap station) completed as scheduled. Once the extension in Mesa is complete and operational, the light rail trip will be measured from the end-of-line Gilbert Road station to the end-of-line 19th Ave/Dunlap station. The service standard threshold is defined as 93 percent or better of all trips on light rail route completed within the allowed on-time window (0 minutes early and 5 minutes late of scheduled arrival times).

3.2 On Time Performance Data Collection and Assessment

Valley Metro currently has one light rail route under operation and it has 35 stations. Valley Metro monitors the on-time performance on an annual basis and makes year to year comparisons. As new extensions are added to the current light rail ends of line, the service assessment will be for this route in its entirety. As new routes to the system are brought into service, the service assessment will be by individual routes. On-time performance is monitored at the Operations Center and is assessed through the SCADA network by the following:

- AM in the peak direction (6–9 a.m.) weekdays
- PM in the peak direction (3–6 p.m.) weekdays
- AM in the peak direction (6–9 a.m.) weekends
- PM in the peak direction (3–6 p.m.) weekends

4.0 SERVICE AVAILABILITY

4.1 Service Availability Standard

Service availability is measured by the distribution of light rail stations along the light rail route that afford residents accessibility to the regional transit system. The service standard has two thresholds:

- Light rail stations are placed approximately one mile apart. Where development patterns are of higher or lower density than typical within the region, an exception to the recommended stop spacing standard may be warranted.
- General considerations for light rail stations are based on the following criteria:
 - Density of population and employment
 - Mix of land uses
 - Connection to other transit services
 - Pedestrian accessibility to the station
 - Planning and design characteristics that support transit oriented development and transit access

4.2 Service Availability Assessment

Valley Metro will assess the light rail service availability through the following:

- Identify light rail station-to-station spacing using the light rail station database
- Identify the minority and low-income populations served within 0.5 mile of each station
- Estimate the number of transit connections at each station



SERVICE AND FARE CHANGES

The City of Mesa has implemented several changes since 2015 as reported in the following Equity Analyses. The City of Mesa conducted a number of public outreach events and solicited public comment throughout the region.

Service Equity Analysis- This analysis and associated data is the responsibility of Valley Metro.

Mesa Bus Service Changes Approval Dates			
	City Council	Service Implementation Date	Estimated Financial Impact
October 2017	6/5/2017	10/23/17	\$311,000
October 2016	6/6/2016	10/24/16	(\$444,000)

All changes in service meeting the definition of “Major Service Change” are subject to a Title VI Equity Analysis prior to City Council approval of the service change. A Title VI Equity Analysis will be completed for all Major Service Changes and will be presented to the boards for its consideration and included in the subsequent City of Mesa Title VI Program report with records of approval dates. Please refer to the document below for said guidance.

Fare Changes- Last fare change occurred March 1, 2013.

Valley Metro

Title VI Assessment of Proposed Service Changes for October 2017

June 2017



1.0 Introduction

This report defines the proposed general service modifications considered for four Valley Metro-operated routes, in addition to three new routes and considers whether the proposed service modifications qualify as “Major Service Changes” in accordance with Valley Metro’s adopted service equity policies and Federal Title VI regulations. The report includes an evaluation of potential effects to minority and/or low-income populations using or residing near the routes considered for service modifications.

2.0 General Service Modifications

The proposed general service modifications to the following bus routes as well as new routes are defined below. Temporary or demonstration route modifications or service changes are excluded from this analysis per Valley Metro’s approved Major Service Change and Service Equity Policy. The proposed service modifications considered include elimination of service along specific streets, extensions of routes to serve new geographic areas, and enhancements to hours of service. In addition, there are three new routes that will be implemented in October 2017.

- **Route 72 (Scottsdale/Rural) – Service Headway Expansion** – In Scottsdale and Tempe, increase Sunday frequency to 30-minutes between the Tempe Transportation Center and Honor Health Scottsdale Thompson Peak. This change will match existing service south of the Tempe Transportation Center. The proposed change results in an increase of approximately 37,808 annual revenue miles for Sunday service.
- **Route 104 (Alma School) – Route Alignment Modification** – In Chandler, modify route to serve the area currently served by the Route 112 end-of-line deviation along Morelos Street and Hamilton Street, thus eliminating the turnaround loop along Boston Street. Route 112 will no longer serve Morelos Street deviation. Route 104 will now serve the one bus stop located on Morelos and Hamilton streets that was previously served by Route 112. In addition, one new bus stop will be added on Boston Street. The proposed change will result in an increase of approximately 11,426 Weekday annual revenue miles.
- **Route 112 (Country Club/Arizona Avenue) – Service Headway Expansion/Route Modification** – In Chandler and Mesa, improve weekday frequency to 15 minutes from 9:00 am until 2:00 pm from Chandler Park and Ride to Country Club Drive and Main Street. Eliminate the turnaround loop along Pecos Road and Morelos Street, the short trips no longer serve Hamilton and Morelos; it now will be served by Route 104 (See proposed changes to Route 104 above). The four existing bus stops for Route 104 would be removed from Pecos Road and Morelos Street.

- **Route 136 (Gilbert Road) – Reduction of Route Length** – In Chandler, all southbound trips will end at Gilbert and Ryan Road. The turnaround at Stearman Drive will now be non-revenue. In addition, one bus stop would be removed on Stearman Drive and added to Gilbert Road. The proposed change will result in a decrease of approximately 7,081 Weekday annual revenue miles and 1,579 Saturday annual revenue miles.
- **Route 140 (Ray Road) – New Route** – In Phoenix, Chandler, Tempe, and Gilbert, new route to serve Ray Road from 48th Street to Gilbert Road with 30-minute frequency for Weekday and Saturday service. Additionally, 80 new bus stops would be added every ¼-mile along the new alignment. The proposed change will result in an increase of approximately 176,989 Weekday annual revenue miles and 31,466 Saturday annual revenue miles.
- **Orbit Saturn (Tempe) – New Route** – In Tempe, new circulator route with 30-minute frequency on weekdays, Saturday and Sunday. Approximately 12-24 new stops would be added along the alignment depending upon the number of designated and flag stops. The proposed change will result in approximately 150,092 Weekday annual revenue miles, 28,394 Saturday annual revenue miles, and 29,878 Sunday annual revenue miles.
- **ZOOM North (Avondale) – New Route** – In Avondale, new route with 30-minute frequency on weekdays and Saturday. Approximately 17-41 new stops would be added along the alignment depending upon the number of designated and flag stops. The proposed change will result in approximately 137,069 Weekday annual revenue miles and 22,280 Saturday annual revenue miles.

3.0 Determination of Major Service Changes

In accordance with Valley Metro's policy for determining whether the proposed service modifications/changes to the aforementioned routes qualify as Major Service Change, each of the route modifications/changes were evaluated independently. In order to be considered a Major Service Change, the route alignment, directional miles or the route's revenue miles must exceed a change threshold of 25%.

- **Route 72 (Scottsdale/Rural) – Service Headway Expansion** – The proposed frequency change would impact approximately 18.00 miles of the total 29.95 route miles; however, there is no change (0.0%) in the route's total miles. The proposed Sunday frequency change would result in an increase of approximately 37,808 or 44.9% of Sunday annual revenue miles (84,169). The proposed service modification is considered a Major Service Change.

- **Route 104 (Alma School) – Route Alignment Modification** – Route modification in Chandler, to serve the area currently being served by the Route 112 end-of-line deviation along Morelos Street and Hamilton Street. This results in the reduction of 0.68 miles of the end-of-line turnaround loop along Arizona Avenue, Boston Street and Delaware Street. The route length reduction amounts to a 14.5% decrease in route miles for weekday service, as well as a 6.5% decrease in revenue miles for weekday service. In addition, the proposed route alignment modification would result in a 1.67-mile expansion along Frye Road, Washington Street, Boston Street, Delaware Street, Morelos Street and Hamilton Street. The proposed route expansion modification results in an increase of approximately 11,426 annual revenue miles (6.4%) and a 12.7% increase in route miles for weekday service. Minority and low-income populations living within one-half mile of the proposed change will continue to receive service from Route 104 by connecting to the route on Frye Road. Due to the percentage of route and revenue mile changes being well below the 25% threshold the expansion of Route 104 is not considered a Major Service Change.
- **Route 112 (Country Club Drive/Arizona Avenue) – Service Headway Expansion/Route Length Reduction** – In Chandler, eliminate the end-of-line deviation along Morelos Street and Hamilton Street, which will be served by Route 104; all trips will continue to serve the Chandler Park-and-Ride. This change results in the reduction of approximately 1.00 mile of the end-of-line deviation along Pecos Road, Hamilton Street and Morelos Street. The route length reduction amounts to an 8.0% decrease in route miles for weekday service, as well as a 19.9% decrease in revenue miles for weekday service. There is no service in Chandler on Saturday and Sunday. The portion of the route being eliminated will be serviced by Route 104. Due to the percentage of route and revenue mile changes being well below the 25% threshold the elimination of Route 112 is not considered a Major Service Change.
- **Route 136 (Gilbert Road) – Route Length Reduction** – In Chandler, all southbound trips will end at Gilbert and Ryan Road. The turnaround at Stearman will be non-revenue service. The proposed change will impact approximately 0.96 miles of the total 14.34 miles; thus resulting in a decrease of 6.7% in the route's total route miles. The proposed change will result in a decrease of approximately 7,081 or 3.2% of weekday annual revenue miles and a decrease of approximately 1,579 or 6.2% of Saturday annual revenue miles. The proposed service modification is not considered a Major Service Change.
- **Route 140 (Ray Road) – New Route** – In Phoenix, Chandler, Tempe, and Gilbert, this new route would serve Ray Road from 48th Street to Gilbert Road with 30-minute frequency for weekday and Saturday service. The proposed new route would be approximately 11.02 miles in length. The proposed new route will result in approximately 176,988 weekday annual revenue miles and approximately 31,466 Saturday annual revenue miles. Since this is a new proposed route it is considered a Major Service Change.

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- **Orbit Saturn (Tempe) – New Route** – In Tempe, new circulator route operating at 30-minute frequency on weekdays, Saturday and Sunday. This new proposed route would be approximately 10.31 miles in length. The proposed new route would result in approximately 150,092 weekday annual revenue miles, approximately 28,394 Saturday annual revenue miles, and approximately 29,878 Sunday annual revenue miles. Since this is a new route it is considered a Major Service Change.
 - **ZOOM North (Avondale) – New Route** – In Avondale, new route operating at 30-minute frequency on weekdays and Saturday. This new proposed route would be approximately 9.18 miles in length and begin at the Walmart Supercenter on Dysart Road and Rancho Santa Fe Boulevard and end at the Gateway Pavilions located at 99th Avenue and McDowell Road, with service operating along Indian School Road. The proposed new route would result in approximately 137,069 weekday annual revenue miles and approximately 22,280 Saturday annual revenue miles. Since this is a new proposed route it is considered a Major Service Change.

Table 1 summarizes the service modifications and whether they qualify as Major Service Changes.

Table 1. Summary of Service Modifications and Major Service Changes

Route	Service Day	Analysis Measure	% Change	Major Service Change
Route 72 – Service Headway Expansion	Sunday	Route Miles	0.0%	No
		Revenue Miles	44.9%	Yes
Route 104 - Route Elimination	Weekday	Route Miles	14.5%	No
		Revenue Miles	6.5%	No
Route 104 – Route Alignment Modification	Weekday	Route Miles	12.7%	No
		Revenue Miles	6.4%	No
Route 112 – Service Headway Expansion/Route Elimination	Weekday	Route Miles	8.0%	No
		Revenue Miles	19.9%	No
Route 136 – Route Modification	Weekday	Route Miles	6.7%	No
		Revenue Miles	-3.2%	No
	Saturday	Route Miles	6.7%	No
		Revenue Miles	-6.2%	No
Route 140 – New Route	Weekday	Route Miles	100.0%	Yes
		Revenue Miles	100.0%	Yes
	Saturday	Route Miles	100.0%	Yes
		Revenue Miles	100.0%	Yes
Orbit Saturn – New Route	Weekday	Route Miles	100.0%	Yes
		Revenue Miles	100.0%	Yes
	Saturday	Route Miles	100.0%	Yes
		Revenue Miles	100.0%	Yes
	Sunday	Route Miles	100.0%	Yes
		Revenue Miles	100.0%	Yes
ZOOM North – New Route	Weekday	Route Miles	100.0%	Yes
		Revenue Miles	100.0%	Yes
	Saturday	Route Miles	100.0%	Yes
		Revenue Miles	100.0%	Yes
	Sunday	Route Miles	100.0%	Yes
		Revenue Miles	100.0%	Yes

4.0 Disparate/Disproportionate Impact Determination

A review of available demographic data was conducted for all routes with proposed changes in order to evaluate the socioeconomic characteristics of the existing routes, and/or the population and income characteristics of populations residing in areas where new service would be provided. The evaluation is based on Valley Metro's policies for service changes. For service changes affecting headways or a reduction in a route length, a review of available origin/destination survey data was conducted. For extensions of routes into new geographic areas where service is currently not provided, the 2014 American Community Survey (ACS) data was used to profile both the minority and low-income populations of the new service area. Low-income is defined as the population with incomes at or below 150 percent of the Department of Health and Human Services poverty level.

A one-half mile (1/2 mile) radial buffer surrounding proposed extensions was used when collecting and interpreting the 2014 ACS data for route extensions, modifications, or new routes. However, in many cases, the census tracts went well beyond the half-mile buffer. Data for the entire census tract was used and not a subset of the data.

Although identifying the demographic profile is only required for proposed service changes that are identified as a "Major Service Change", the Title VI Coordinator determined that identifying the demographic profile for each proposed service change provides value in this Title VI Analysis.

- **Route 72 (Scottsdale/Rural) – Service Headway Expansion** – According to the most recent Transit On-Board Origin/Destination Survey, 50.0% of the riders are considered minority and 45.6% are low-income riders.
- **Route 104 (Alma School) – Route Alignment Modification** – According to the most recent Transit On-Board Origin/Destination Survey, the route consists of 53.2% minority and 57.6% low-income populations.
- **Route 112 (Country Club/Arizona Avenue) –Service Headway Expansion/Route Elimination** – According to the most recent Transit On-Board Origin/Destination Survey, the route consists of 54.5% minority and 41.8% low-income populations.
- **Route 136 (Gilbert) – Service Headway Expansion** – According to the most recent Transit On-Board Origin/Destination Survey, the route consists of 48.6% minority and 57.8% low-income populations.
- **Route 140 (Ray) – New Route** – The most current and previous Transit On-Board Origin/Destination surveys do not include this new route alignment along Ray Road, therefore, 2014 ACS data was used. According to the 2014 ACS demographic data,

the proposed new route alignment consists of 43.5% minority and 13.0% low-income populations.

- **Orbit Saturn (Circulator) – New Route** – The most current and previous Transit On-Board Origin/Destination surveys do not include this new circulator route alignment in Tempe, therefore, 2014 ACS data was used. According to the 2014 ACS demographic data, the proposed new route alignment consists of 39.8% minority and 16.8% low-income populations.
- **ZOOM North (Circulator) – New Route** – The most current and previous Transit On-Board Origin/Destination surveys do not include this new circulator route alignment in Avondale, therefore, 2014 ACS data was used. According to the 2014 ACS demographic data, the proposed new route alignment consists of 62.7% minority and 16.8% low-income populations.

Table 2 below provides a summary of the 2014 ACS data representing the minority population and low-income populations residing in Census tracts that are directly affected by each of the proposed service modifications. Table 2 also provides data from Valley Metro's most recent Origin and Destination Survey conducted in 2015 showing the minority and low-income populations along the portion of the route subjected to change. The table is split to show the minority and low-income percentages first along the existing routes, prior to these proposed changes, and then along the entire route slated to change. The bottom of the table shows the demographics of the transit service area based on the 2014 ACS data and the system-wide rider demographics based on Valley Metro's 2015 Origin and Destination Survey.

Table 2. Census Demographic Data for Current and Proposed Route Alignments

Current Route Alignment Demographics (Census)¹	Minority²	Low-Income³
Route 72	30.6%	16.4%
Route 104	52.1%	25.6%
Route 112	54.6%	26.5%
Route 136	33.9%	17.8%
Service Modification Demographics	Minority	Low-Income
Route 72 (Service Headway Expansion) (O/D Survey ⁴)	50.0%	45.6%
Route 104 (Route Alignment Modification / Route Elimination) (O/D Survey ⁴)	53.2%	57.6%
Route 112 (Service Headway Expansion / Route Elimination) (O/D Survey ⁴)	54.5%	41.8%
Route 136 (Route Alignment Modification) (O/D Survey ⁴)	48.6%	57.8%
Route 140 (New Route) (Census)	43.5%	13.0%
Orbit Saturn (New Route) (Census)	39.8%	19.7%
ZOOM North (New Route) (Census)	62.7%	16.8%
Valley Metro Service Area (Census)	46.1%	23.2%
Valley Metro System-Wide Percentage (O/D Survey⁴)	57.8%	51.4%

¹2014 ACS Data per census tracts that are at a minimum ½ mile on either side of the route.

²The average minority population based on the 2014 ACS census tract data.

³The average low-income population based on the 2014 ACS census tract data for populations with incomes at or below 150 percent of the Department of Health and Human Services poverty level.

⁴The 2015 Transit On-Board Origin/Destination Survey was conducted at the 95% confidence level, with a margin of error of +/- 0.85% for the buses and +/- 1.4% for the light rail.

5.0 Disparate/Disproportionate Impact Determination

Per the Valley Metro's Major Service Change and Service Equity Policy, only the proposed service changes that are considered a "Major Service Change" will be evaluated to determine if the proposed change will result in a disparate impact to minority populations and/or a disproportionate burden to low-income populations.

The proposed service changes that are considered a Major Service Change include:

- Route 72 – service headway expansion
- Route 140 – new route
- Orbit Saturn– new route
- ZOOM North – new route

The proposed changes listed above were evaluated for potential disparate impacts and disproportionate burdens. Note that all the other proposed service changes may have a minority and/or low-income population greater than either the transit service area or the system-wide percentages; however, the adjustments would affect all communities and would not result in a disparate or disproportionate impact to minority or low-income populations.

Route 72 – Service Headway Expansion

Route 72 will increase to 30-minute all day frequency between the Tempe Transportation Center and Honor Health Scottsdale Thompson Peak on Sunday to match the existing service from Chandler Fashion Mall to the Tempe Transportation Center, which will result in an additional 32 trips within the Cities of Scottsdale and Tempe. Based on the Transit On-Board Survey (2015), 50.0% of the Route 72 riders are minorities, which is 7.8 percentage points below the Valley Metro system-wide percentage of minority riders (57.8%). The minority population is less than the system-wide percentage and, therefore, there is not a disparate impact to the minority population. Low-income riders account for 45.6% of the route's ridership, which is 5.8 percentage points below the Valley Metro system-wide percentage of low-income riders (51.4%). The percentage of the low-income population is less than the system-wide percentage and, therefore, there is not a disproportionate burden to the low-income population. The proposed service headway expansion on Sunday would provide more travel opportunities to the northern and southern portions of the route and will be congruent to existing service, therefore, the increase in hours of service and headway would not result in a disparate impact to minorities or a disproportionate burden to low-income populations.

Route 140 – New Route

Route 140 will be a new route operating at 30-minute all-day frequency from 6:00 A.M. to 10:00 P.M. between 48th Street and Gilbert Road in Phoenix, Tempe, Chandler and Gilbert on weekdays and Saturday. The proposed route will result in 64 trips on weekdays and 56 trips on Saturday within the Cities of Phoenix, Tempe, Chandler and Gilbert. Based on the ACS 2014 data, 43.5% of the population within the census tracts around the proposed Route 140 alignment are minorities, which is 2.6 percentage points below the Valley Metro system-wide percentage of minority riders (46.1%). Low-income riders account for 13.0% of the route's ridership, which is 10.1 percentage points below the Valley Metro system-wide percentage of low-income riders (23.2%). The proposed new route alignment will provide service to an area that currently does not have local bus service, thus, expanding connections for populations living to west of Downtown Chandler. In addition, Valley Metro is not eliminating or reducing service on other routes; therefore, the proposed new route would not result in disparate impacts to the minority population or a disproportionate burden impact to the low-income population.

Orbit Saturn – New Route

The Orbit Saturn will be a new circulator route operating at 30-minute all-day frequency with service operating from 7:00 A.M. to 9:00 P.M. on weekdays, 8:00 A.M. to 10:00 P.M. on Saturday and from 8:00 A.M. to 8:00 P.M. on Sunday. The route will travel from Priest Drive and Elliot Road, travel through Kiwanis Park to connect to Rural Road, travel east on Guadalupe Road and north to Baseline Road and McClintock Drive. The proposed route will result in 58 trips on weekdays, 54 trips on Saturday and 46 trips on Sunday within the City of Tempe. Based on the ACS 2014 data, 39.8% of the population within

the census tracts around the proposed Orbit Saturn alignment are minorities, which is 6.3 percentage points below the Valley Metro system-wide percentage of minority riders (46.1%). Low-income riders account for 19.7% of the route's ridership, which is 3.5 percentage points below the Valley Metro system-wide percentage of low-income riders (23.2%). In addition, Valley Metro is not eliminating or reducing service on other routes; therefore, the proposed new route would not result in disparate impacts to the minority population or a disproportionate burden impact to the low-income population.

ZOOM North – New Route

The ZOOM North will be a new circulator route operating at 30-minute all-day frequency with service operating from 5:00 A.M. until 8:00 P.M. The route begins at the Walmart Supercenter on Dysart Road and Rancho Santa Fe Boulevard and ends at the Gateway Pavilions located at 99th Avenue and McDowell Road, with service operating along Indian School Road on weekdays and Saturday. The proposed route will result in 60 weekday trips between the Rancho Santa Fe Shopping Center and Gateway Pavilions. Saturday service results in 48 trips for the full alignment. The ZOOM serves the Palm Valley Medical Plaza located at McDowell Road and Palm Valley Boulevard.

Based on the ACS 2014 data, 62.7% of the population within the census tracts around the proposed ZOOM North alignment are minorities, which is 16.6 percentage points above the Valley Metro system-wide percentage of minority riders (46.1%). Low-income riders account for 16.8% of the route's ridership, which is 6.4 percentage points below the Valley Metro system-wide percentage of low-income riders (23.2%). Valley Metro is not eliminating or reducing service on other routes; therefore, the proposed new route would not result in disparate impacts to the minority population or a disproportionate burden impact to the low-income population. The proposed new route alignment will provide service to an area that currently does not have local bus service, thus, expanding connections for populations living west of Downtown Phoenix. The new circulator will connect residents to major destinations including, the Rancho Santa Fe Shopping Center and Gateway Pavilions.

6.0 Public Outreach

Throughout this process, Valley Metro conducted public outreach activities for regional service changes from mid-April to mid-May, 2017. Valley Metro also conducted public outreach efforts by placing informational ads in the local newspaper, placed A-frames in areas where the proposed changes are occurring, distributed informational e-mails to local and agency stakeholders, as well as played Route Scout announcements. Targeted outreach was performed on affected routes and at affected bus stops and Transit Centers.

Valley Metro held an informational webinar on May 9, 2017, to clarify any service changes. Throughout the outreach process, online comment was welcomed at

www.valleymetro.org/servicechanges, through social media using #vmsservice and at the email address input@valleymetro.org.

Finally, Valley Metro held a public hearing on May 15, 2017, at Valley Metro's Board Room in Downtown Phoenix to discuss all proposed service changes. Comments were accepted through May 19, 2017.

7.0 Conclusions

A summary of the analysis by route and the determination of whether a disparate impact or disproportionate burden would result as an outcome of the proposed changes are displayed in Table 3. It is important to remember that the service modifications proposed are either changes to the route alignments and/or route lengths or are service frequency changes, in addition to three new routes. The type of service modification determines the data to be used for analyzing whether the proposed change will result in a disparate or disproportionate impact. Each of the routes has been identified as to whether the proposed service modification would qualify as a "Major Service Change." The determination of whether an adverse, disparate impact or disproportionate burden occurs is based on the following:

1. The proposed service modification qualifies as a Major Service Change.
2. The percentage of minority or low-income populations is above the Valley Metro Service Area threshold or the Valley Metro System-wide threshold.
3. Improvements to service (e.g. extensions of routes to serve new areas or frequency improvements) that provide a benefit to all users do not constitute an adverse, disparate or disproportionate impact.

Table 3. Summary of Service Modifications and Equity Impact Assessment

Route	Major Service Change	Type of Change	Minority Percentage	Low-Income Percentage	Disparate / Disproportionate Impact Determination
Route 72	Yes	Service Headway Expansion ¹	50.0%	45.6%	The percentage of the minority and low-income populations is lower than the system-wide percentage; the proposed service headway expansion would provide more travel opportunities to the northern portion of the route. Therefore, there are no disparate impacts or disproportionate burdens.
Route 104	No	Route Alignment Modification: Route Elimination / Expansion ¹	53.2%	57.6%	None
Route 112	No	Service Headway Expansion/Route Elimination ¹	54.5%	41.8%	None
Route 136	No	Route Alignment Modification: Eliminated Segment ¹	48.6%	57.8%	None
Route 140	Yes	New Route ²	51.0%	41.8%	The percentage of the minority and low-income populations is lower than the system-wide percentage; the proposed new route would provide more travel opportunities and connections to activity centers for residents west of Downtown Chandler. Therefore, there are no disparate impacts or disproportionate burdens.
Orbit Saturn	Yes	New Route ²	37.8%	50.2%	The percentage of the minority and low-income populations is lower than the system-wide percentage; the proposed new route would provide more travel opportunities to residents in south Tempe. Therefore, there

Proposed October 2017 Service Changes
Title VI Analysis

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June 2017

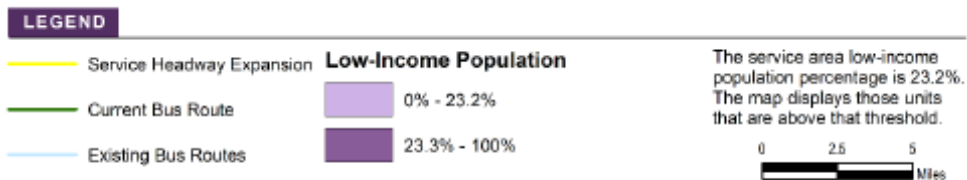
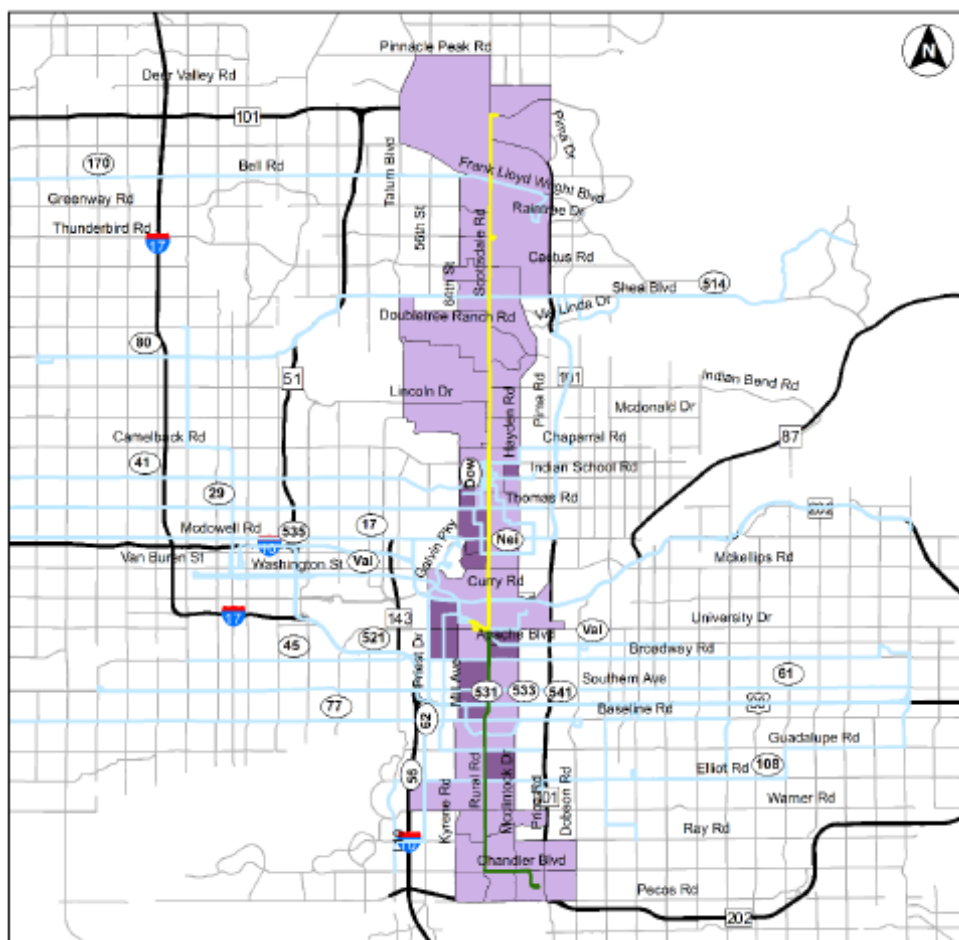
Route	Major Service Change	Type of Change	Minority Percentage	Low-Income Percentage	Disparate / Disproportionate Impact Determination
					are no disparate impacts or disproportionate burdens.
ZOOM North	Yes	New Route ²	62.7%	16.8%	The percentage of low-income populations is less than the service area; however, the percentage of minority populations is greater than the service area. Valley Metro is not eliminating or reducing service on other routes; therefore, the proposed new route would not result in disparate impacts to the minority population or a disproportionate burden impact to the low-income population. The proposed new route alignment will provide service to an area that currently does not have local bus service, thus, expanding connections for populations living west of Downtown Phoenix. The new circulator will connect residents to major destinations including, the Rancho Santa Fe Shopping Center and Gateway Pavilions.

¹ Transit On-Board Origin/Destination Survey Data, 2014-2015

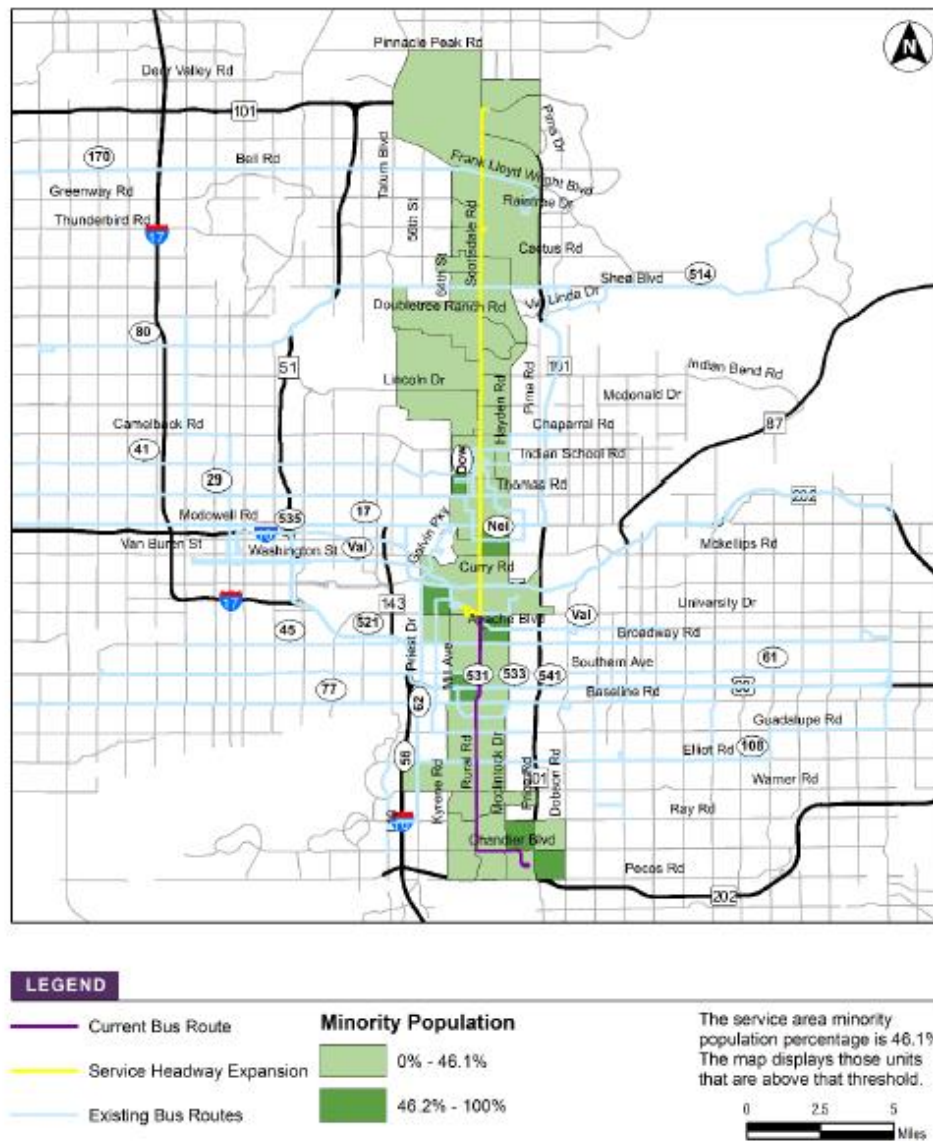
² American Community Survey (ACS) Data, 2014

PROPOSED SERVICE CHANGES AND DEMOGRAPHIC MAPS

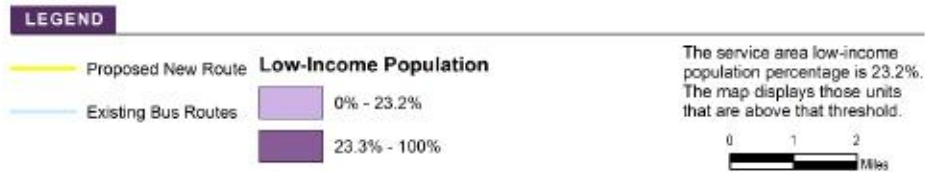
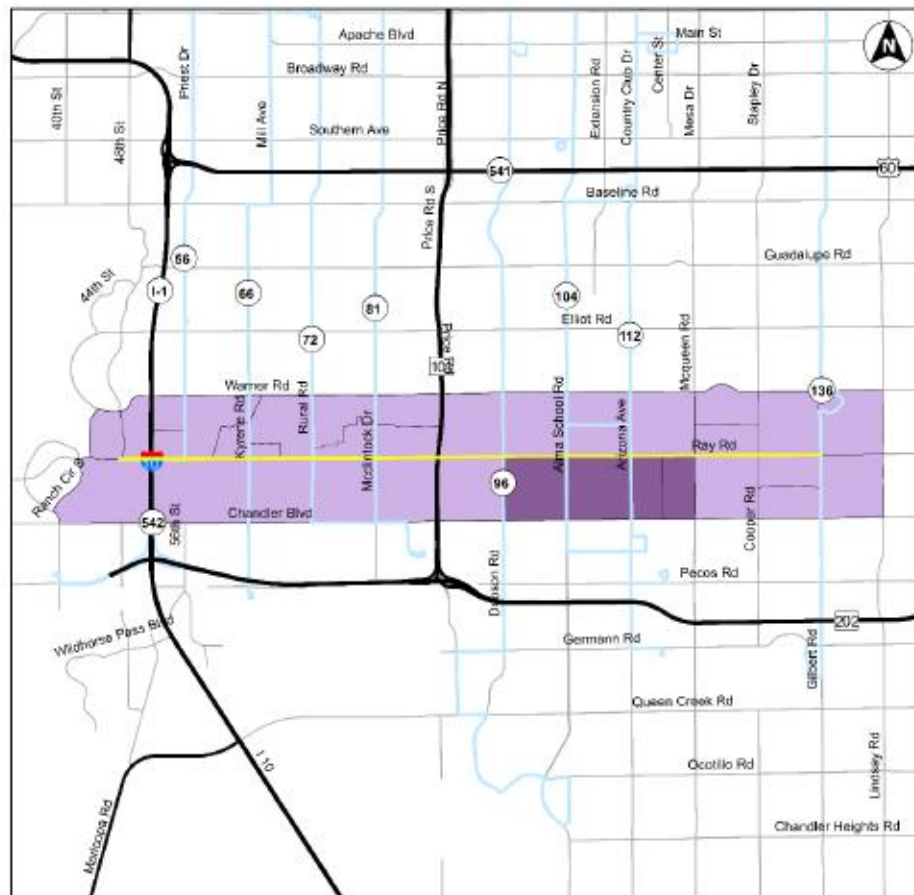
Route 72 Proposed Service Headway Expansion & Low-Income Population



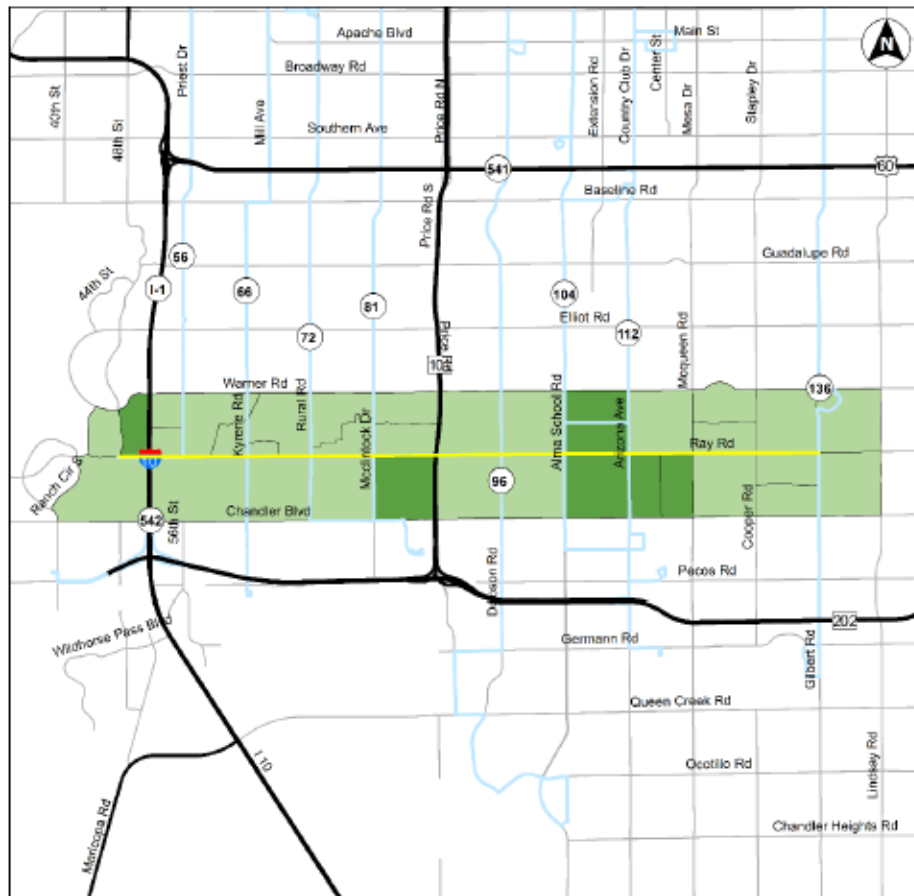
Route 72 Proposed Service Headway Expansion & Minority Population



Route 140 Proposed New Route & Low-Income Population



Route 140 Proposed New Route & Minority Population



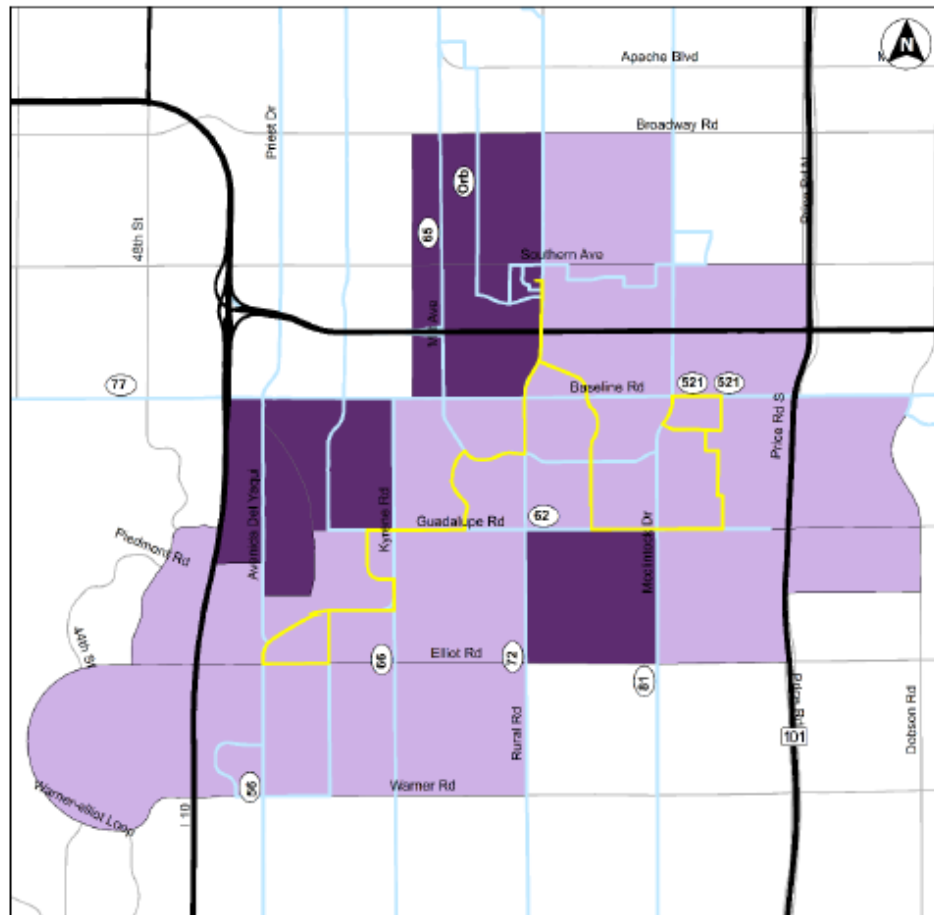
LEGEND



The service area minority population percentage is 46.1%. The map displays those units that are above that threshold.



Orbit Saturn Proposed New Route & Low-Income Population



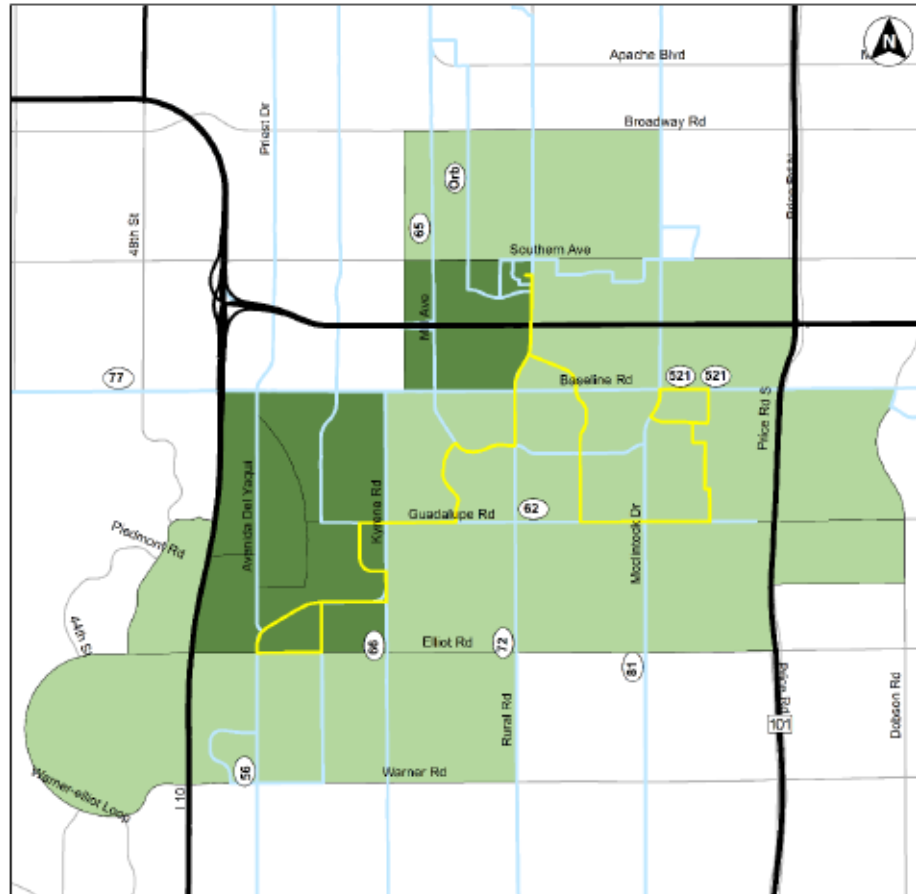
LEGEND

- Proposed New Route
 - Existing Bus Routes
- Low-Income Population**
- 0% - 23.2%
 - 23.3% - 100%

The service area low-income population percentage is 23.2%. The map displays those units that are above that threshold.



Orbit Saturn Proposed New Route & Minority Population



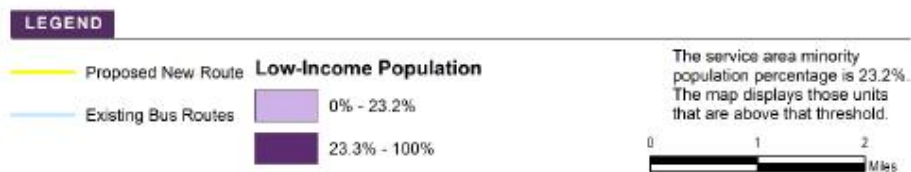
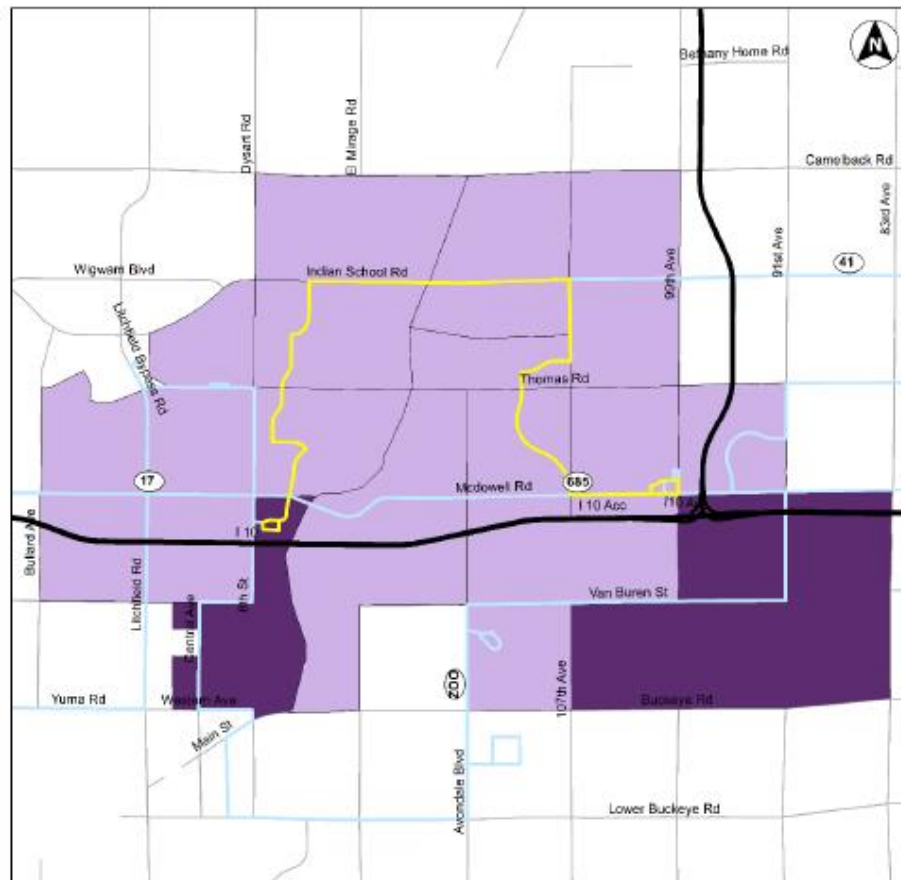
LEGEND

- Proposed New Route
 - Existing Bus Routes
- Minority Population**
- 0% - 46.1%
 - 46.2% - 100%

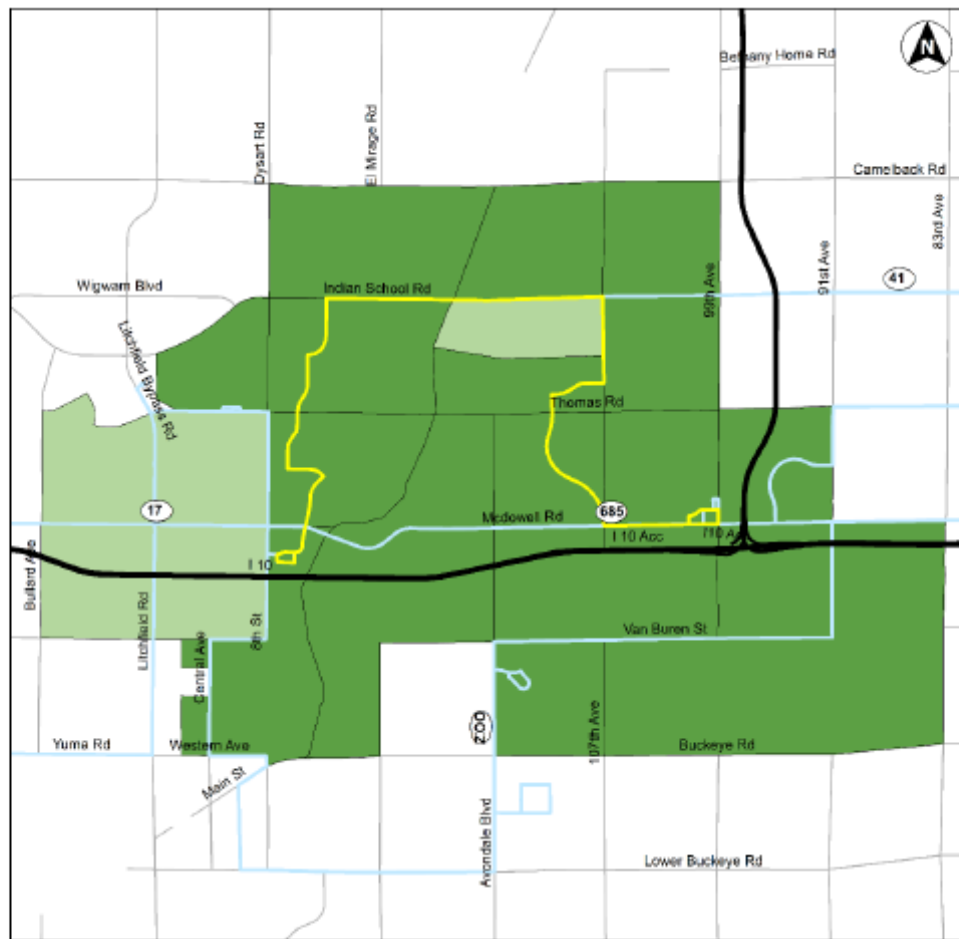
The service area minority population percentage is 46.1%. The map displays those units that are above that threshold.



ZOOM North Proposed New Route & Low-Income Population



ZOOM North Proposed New Route & Minority Population



LEGEND

- Proposed New Route
 - Existing Bus Routes
- Minority Population**
- 0% - 46.1%
 - 46.2% - 100%

The service area minority population percentage is 46.1%. The map displays those units that are above that threshold.





COUNCIL APPROVAL FOR THE TITLE VI PROGRAM

ATTACH A COPY OF THE BOARD MEETING MINUTES HERE

APPENDIX A



CITY OF MESA TITLE VI NOTICE TO THE PUBLIC

The City of Mesa operates without regard to race, color, national origin, income status, sex, age or disability in accordance with the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations, including Title II of the ADA. Title VI of the Civil Rights Act requires that no person in the United States shall be excluded from participation in, be denied the benefits of or otherwise be subjected to discrimination under any City program or activity, on the grounds of race, color, or national origin. The City of Mesa strives to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not. To help ensure access to City programs, services and activities, the City will provide translations, will reasonably modify policies and procedures and will provide auxiliary aids or alternative formats to persons with disabilities. As a sub recipient of federal funding, The City of Mesa is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by the U.S. Department of Justice per 28 Code of Federal Regulations (CFR) § 42.401 et seq. and 28 CFR § 50.3.

Any person who believes they have been aggrieved by an unlawful discriminatory practice may file a complaint with the City of Mesa's Diversity Office. For accommodations, translations, to file a complaint or additional information, contact the Title VI/Title II Coordinator.

TÍTULO VI DE LA CIUDAD DE MESA AVISO PÚBLICO

La Ciudad de Mesa opera sin distinción de raza, color, origen nacional, estado de ingresos, sexo, edad o discapacidad conforme a la Ley de Derechos Civiles de 1964, la Ley de Restauración de Derechos Civiles de 1987 y las regulaciones y estatutos relacionados, incluyendo el Título II de ADA. El Título VI de la ley de Derechos Civiles ordena que ninguna persona en los Estados Unidos deba ser excluida, se le nieguen los beneficios de participar o sea sujeta a discriminación en ningún programa o actividad de la Ciudad, por motivos de raza, color u origen nacional. La Ciudad de Mesa se esfuerza en garantizar la no discriminación en todos sus programas y actividades, sin tener en cuenta si esos programas y actividades reciben fondos federales. Para ayudar a garantizar el acceso a los programas, servicios y actividades municipales, la Ciudad proporciona traducciones y está en condiciones de modificar, de manera razonable, políticas y procedimientos y de proveer ayudas auxiliares o formatos alternativos para personas con discapacidades. Como sub-destinatario de fondos federales, La Ciudad de Mesa es responsable de iniciar y monitorear las actividades del Título VI, preparar los reportes necesarios y llevar a cabo otras responsabilidades conforme al Código 28 de las Regulaciones Federales (CFR) § 42.401 y siguientes, y 28 CFR § 50.3., del Departamento de Justicia de los Estados Unidos.

Toda persona que considere que ha sido agraviada por una práctica discriminatoria ilegal puede presentar una queja ante la Oficina de Diversidad de la Ciudad de Mesa. Para solicitar adaptaciones, traducciones, presentar una queja o solicitar información adicional, comuníquese con el Coordinador del Título VI / Título II.

RUTH GIESE

Title VI Coordinator

480.644.5033

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CITY OF MESA DIVERSITY OFFICE

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PO Box 1466

Mesa, AZ 85211

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APPENDIX B



TITLE VI POLICY STATEMENT

The City of Mesa operates without regard to race, color, or national origin in accordance with the Civil Rights Act of 1964. Title VI of the Civil Rights Act requires that no person in the United States shall be excluded from participation in, be denied the benefits of or otherwise be subjected to discrimination under any City program or activity, on the grounds of race, color, or national origin. The City of Mesa strives to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not. To help ensure access to City programs, services and activities, the City will provide translations, will reasonably modify policies and procedures and will provide auxiliary aids or alternative formats to persons with disabilities or limited English Proficiency.

As a sub recipient of federal funding, The City of Mesa is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by the U.S. Department of Justice per 28 Code of Federal Regulations (CFR) § 42.401 et seq. and 28 CFR § 50.3.

Should the City of Mesa distribute Federal-aid funds to another entity/person, Mesa will ensure all sub recipients fully comply with Mesa's Title VI Nondiscrimination Program requirements. The City Manager has delegated the authority to City of Mesa Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

City of Mesa
Christopher Brady, City Manager

by


(Signature of Authorized Official)

DATED

8/15/18