



2020 TITLE VI PROGRAM

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



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Introduction

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

SAMTD, doing business as “Cherriots,” is a mass transit district created by the Oregon legislature pursuant to Oregon Revised Statutes (ORS) Chapter 267. SAMTD is a local government as defined under Oregon law, providing bus and ADA paratransit public transportation service in the Salem-Keizer metro area, providing about 3.2 million rides each year. Guided by the SAMTD Board of Directors representing seven districts, the organization is directed by a General Manager appointed by the board and employs approximately 330 union, non-union, and contract employees.

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

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

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

Overview of Title VI

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

Title VI discrimination

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

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

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

Programs covered by Title VI

The Civil Rights Restoration Act of 1987 amended each of the affected statutes by adding a section defining the word "program" to make clear that discrimination is prohibited throughout an entire agency if any part of the agency receives Federal financial assistance. Approximately 30 Federal agencies provide Federal financial assistance in the form of funds, training, and technical and other assistance to State and local governments, and non-profit and private organizations. These recipients

of Federal assistance, in turn, operate programs and deliver benefits and services to individuals (known as "beneficiaries") to achieve the goals of the Federal legislation that authorizes the programs.

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

Definitions

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

Demand response system – Any non-fixed route system of transporting individuals that requires advanced scheduling including services provided by public entities, non-profits, and private providers. An advance request for service is a key characteristic of demand response service. Deviated fixed route services are one type of demand response system. Dial-a-Ride services are also in this category.

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

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

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

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

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

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

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

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

Federal financial assistance – refers to: (1) grants and loans of Federal funds; (2) the grant or donation of Federal property and interests in property; (3) the detail of

Federal personnel; (4) the sale and lease of, and the permission to use (on other than a casual or transient basis), Federal property or any interest in such property without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient; and (5) any Federal agreement, arrangement, or other contract that has as one of its purposes the provision of assistance.

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

Low-income persons – Persons whose median household income is at or below 200 percent of the U.S. Department of Health and Human Services (HHS) poverty guidelines.

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

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

Minority persons – Include the following:

- American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- Black or African American, which refers to people having origins in any of the

Black racial groups of Africa.

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

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

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

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

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

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

Predominantly minority area – A geographic area, such as a neighborhood, Census tract, block or block group, or traffic analysis zone, where the proportion of

minority persons residing in that area exceeds the average proportion of minority persons in the recipient's service area.

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

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

Service area – The geographic area in which a transit agency is authorized by its charter to provide service to the public. In the case of SAMTD, that area is inside the Salem-Keizer Urban Growth Boundary (UGB) for Cherriots Local, Cherriots LIFT, and Cherriots Shop and Ride service and all of Marion and Polk counties for Cherriots Regional express routes. One Cherriots commuter express route provides service between Salem and Wilsonville through an agreement with South Metro Area Regional Transit (SMART).

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

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

Title VI Program – A document developed by an FTA recipient to demonstrate how the recipient is complying with Title VI requirements. Direct and primary recipients

must submit their Title VI Programs to FTA every three years. The Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA.

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

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

Part I: General requirements

FTA requires that all direct and primary recipients of Federal financial assistance document their compliance by submitting a Title VI Program to their FTA regional civil rights officer once every three years. The Title VI Program must be approved by the direct or primary recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. Attachment A contains a copy of Board Resolution #2020-01, which adopted the 2020 Title VI Program. The General Reporting Requirements section of this report contains Title VI Program components required in Chapter III of FTA circular 4702.1B. This section includes the following information:

1. Title VI Notice to the Public
2. Title VI complaint procedures
3. Title VI complaint form
4. List of Title VI investigations, complaints, and lawsuits
5. Public Participation Plan
6. Language Assistance Plan
7. Committee membership and recruitment
8. Subrecipient monitoring
9. Facilities siting and construction
10. Major service and fare change equity analyses
11. Board approval of the 2020 Title VI Program update

Title VI Notice to the Public

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

1. On the Cherriots website.¹
2. In every Cherriots Local, Cherriots Regional, Cherriots Shop and Ride, and Cherriots LIFT bus.
3. In the Cherriots Customer Service lobby at the Salem Downtown Transit Center.

¹<https://www.cherriots.org/civilrights/>

4. In each passenger waiting shelter at the Keizer Transit Center.

Title VI complaint procedures

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

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

Title VI complaint form

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

List of Title VI investigations, complaints, and lawsuits

There have been no Title VI investigations, complaints, or lawsuits filed with SAMTD since May 25, 2017, which is the date of approval of the 2017 version of the document.

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

Public Participation Plan

SAMTD's public engagement process documented in Chapter 6 of the Service Guidelines constitutes the means and methods used to seek public involvement in the planning of routes uses the Public Participation Plan (PPP) of the Salem-Keizer urban area Metropolitan Planning Organization (MPO). This PPP was adopted by the Salem-Keizer Area Transportation Study (SKATS) Policy Committee on Nov. 28, 2017, and is administered by the Mid-Willamette Valley Council of Governments

²https://www.cherriots.org/media/doc/Cherriots_Title_VI_Complaint_Procedure_2018.pdf

³https://www.cherriots.org/media/doc/Cherriots_Title_VI_Complaint_Form_2018_cYJoUpf.pdf

(MWVCOG). A copy of the PPP is provided in Attachment E. One of the board members is a voting member of the SKATS Policy Committee, and since the committee only approves programs and policies with 100 percent consensus, it follows that any policy or program adopted by the SKATS Policy Committee is representative of SAMTD.

The following is a summary of SAMTD's inclusive public participation since May 2017 when SAMTD last submitted a Title VI program to FTA. The summary below includes all planning-related outreach events held from May 2017 to May 2020. It covers all fare and service changes as well as the construction projects completed during that period.

Public participation highlights

The following is a summary of SAMTD's inclusive public participation since its 2017 Title VI Program submission. The summary spans from May 2017 to May 2020. During this period SAMTD conducted outreach for:

2017 Needs Assessment

In November 2017, SAMTD staff surveyed riders and non-riders to help determine transit needs. Staff created web and print versions of the survey both in English and Spanish. The survey was focused on the possibility of adding bus service on Saturdays, Sundays, later evenings, and holidays. Staff also asked riders what else they would change about Cherriots service to make it work better for them. Strategies staff employed to reach out to riders and the greater community included: email to subscribers, email to partner agencies, Facebook posts, Twitter posts, a project webpage, a feature story on the Cherriots homepage, on-board bus survey (Cherriots Local and Cherriots Regional buses), announcements at public meetings, and six tabling events in the Downtown Transit Center lobby. In total, staff collected 2,852 surveys. Of those collected, 64 percent (1,814) were submitted online and 36 percent (1,038) were collected in person. More details about the public outreach can be found in the 2017 Needs Assessment provided as Attachment F.

West Salem Connector replacement

Outreach events were held to gather input from riders and non-riders at three events in West Salem. Two tabled events were held at the West Salem Transit Center and one outside the West Salem Starbucks in order to collect feedback on the proposal to replace the demand responsive Connector service with two fixed route bus routes (Routes 26 & 27).

OR-99E transit planning outreach – bridging cultures event

This event is held in the City of Canby every year to bring Hispanic and non-Hispanic families and community members together. It was held on Nov. 18, 2017 at Baker Prairie Middle School in Canby. Cherriots and Canby Area Transit (CAT) partnered in this outreach event to get people to take a public survey regarding the Highway OR-99E Transit Planning Project. Cherriots and CAT were partners in this feasibility study to see if it made sense for transit to be shared along the OR-99E corridor between the two agencies.

A Better Cherriots outreach events

Multiple events in February and March of 2018 were held for the public to weigh in on service changes proposed using the new Statewide Transportation Improvement Fund (STIF) formula fund. Service changes were revised using public feedback to implement extended weekday evening, Saturday, and Sunday service. This campaign was called “A Better Cherriots” and many of the service changes were implemented in September 2019. Online and paper surveys were collected (656 total) during a month of outreach.

OR-99E project board coordination

On May 8, 2018, members of the board met with the Canby Area Transit Advisory Committee in order to talk about priorities and hear from the project consultant about the alternatives to consider. This was a meeting open to the public and was held at the Canby City Hall.

2019 fare change

Outreach events were held in May and June of 2018 for the July 1, 2019 fare change. A public survey was held May 13 – June 10, 2018 to gain feedback on the proposed new fare structure. In-person events were held at the Customer Service lobby of

the Downtown Transit Center, Chemeketa Community College, and various high schools, senior centers, and neighborhood associations throughout Salem and Keizer.

Polk County Flex redesign proposal

A survey was conducted June 1 – July 15, 2019 online and at in-person events in the three communities served by the Polk County Flex. Surveys and feedback from the city councils and staff were used to develop a final proposal, which will be implemented in 2020. Existing riders and key organizations were included as well as many non-riders.

Ongoing service changes

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

Language Assistance Plan

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

What is analyzed in the four-factor analysis?

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

2014-2018 American Community Survey

Data was gathered from the U.S. Census American Community Survey (ACS) 5-Year Estimate (2014-18) for Marion and Polk counties and for the Salem Census County Division (CCD), which approximates the area inside the Salem-Keizer UGB. Since the percentages of average LEP populations for the two counties was within one or two percentage points of the Salem CCD, SAMTD will use the values for the counties as a whole. This will ensure that the Cherriots Regional and Cherriots Local services are treated equally. Table I-1 displays the numbers below.

Table I- 1. *Language spoken at home by ability to speak English for the population 5 years old and over for Marion and Polk counties*

	Population Estimate	Population Percent
Speaks English “very well”	353,125	90.6%
Speaks English less than “very well”	36,486	9.4%
Spanish speakers	30,311	7.8%
Russian, Polish, and Other Slavic language speakers	1,577	0.4%
Other language speakers	3,605	0.9%
Total for Marion and Polk counties	389,611	100%

Source: ACS 2014-18, Table C16001.

Data provided by the 2014-18 American Community Survey 5-Year Estimate above show that more than 1,000 individuals who speak English less than “very well” reside in Marion and Polk counties. The majority of these LEP persons speak Spanish, and the second highest LEP are in the “Russian, Polish, and Other Slavic language speakers” group, which primarily are Russian speakers.

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

Figures I-1 and I-2 show the concentration of LEP individuals in relation to the area

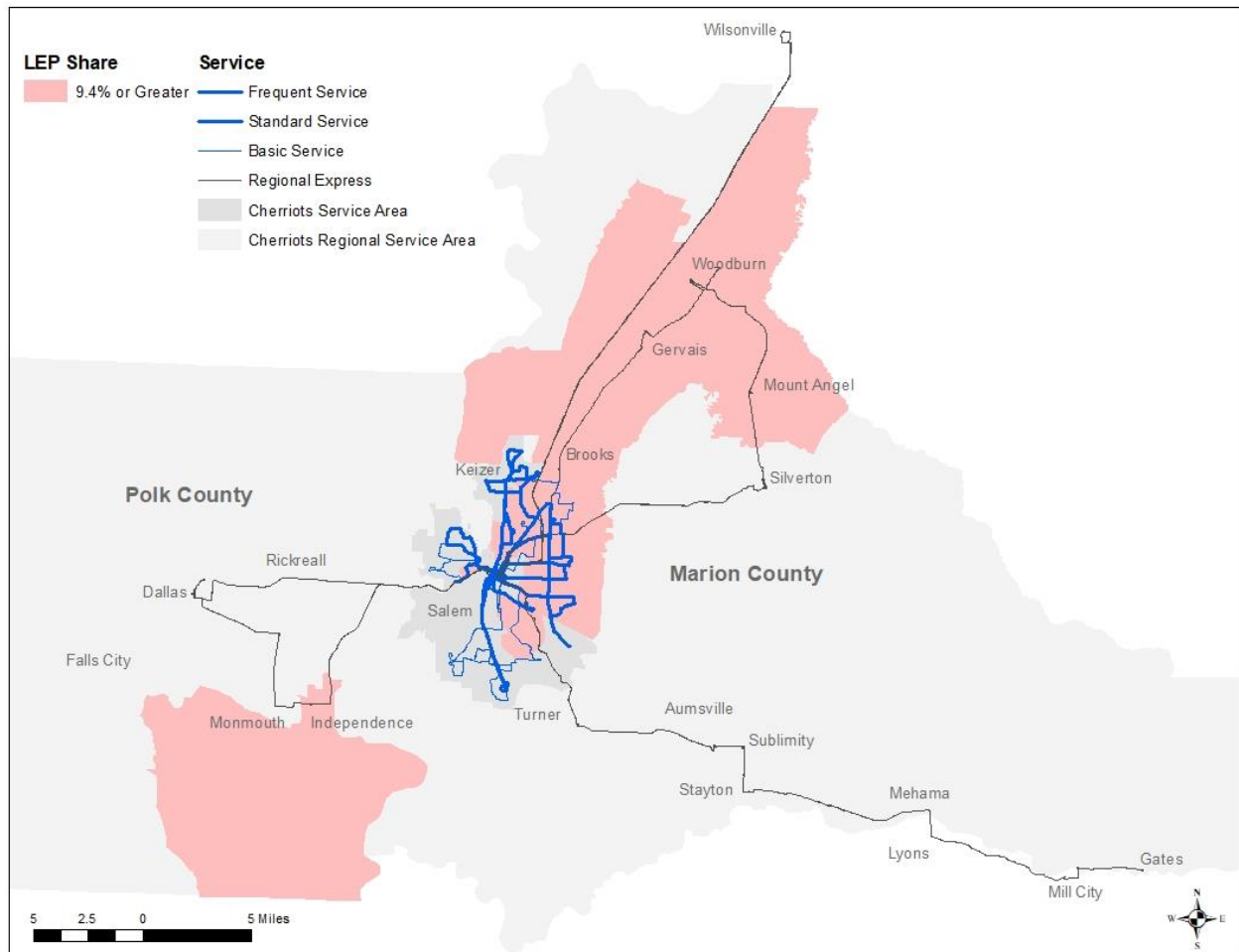
averages. Figure I-1 shows the percentage of population considered LEP by U.S. Census block group for Marion and Polk counties. Figure I-2 displays the percentage of population considered LEP by U.S. Census block group within the Salem-Keizer UGB. The average LEP population is 9.4 percent for Marion and Polk counties, together.

Following the DOT's and Department of Justice's safe harbor provision for LEP communications, SAMTD has translated its Title VI policy statement into Russian since June 2014 due to a large population of LEP Russian speakers near the city of Woodburn who speak English less than "very well," and could potentially use Cherriots Regional buses. The Title VI Notice to the Public is posted in all three languages in all Cherriots Local, Cherriots Regional, Cherriots Shop and Ride, and Cherriots LIFT vehicles.

The safe harbor provision stipulates that, "if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five (5) percent or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations." The Spanish-speaking LEP group is the largest with approximately 30,000 people, and the Russian-speaking LEP group is the second largest at around 1,500 people. Other languages make up about 3,600 people who are considered LEP, but the individual languages do not meet the safe harbor threshold.

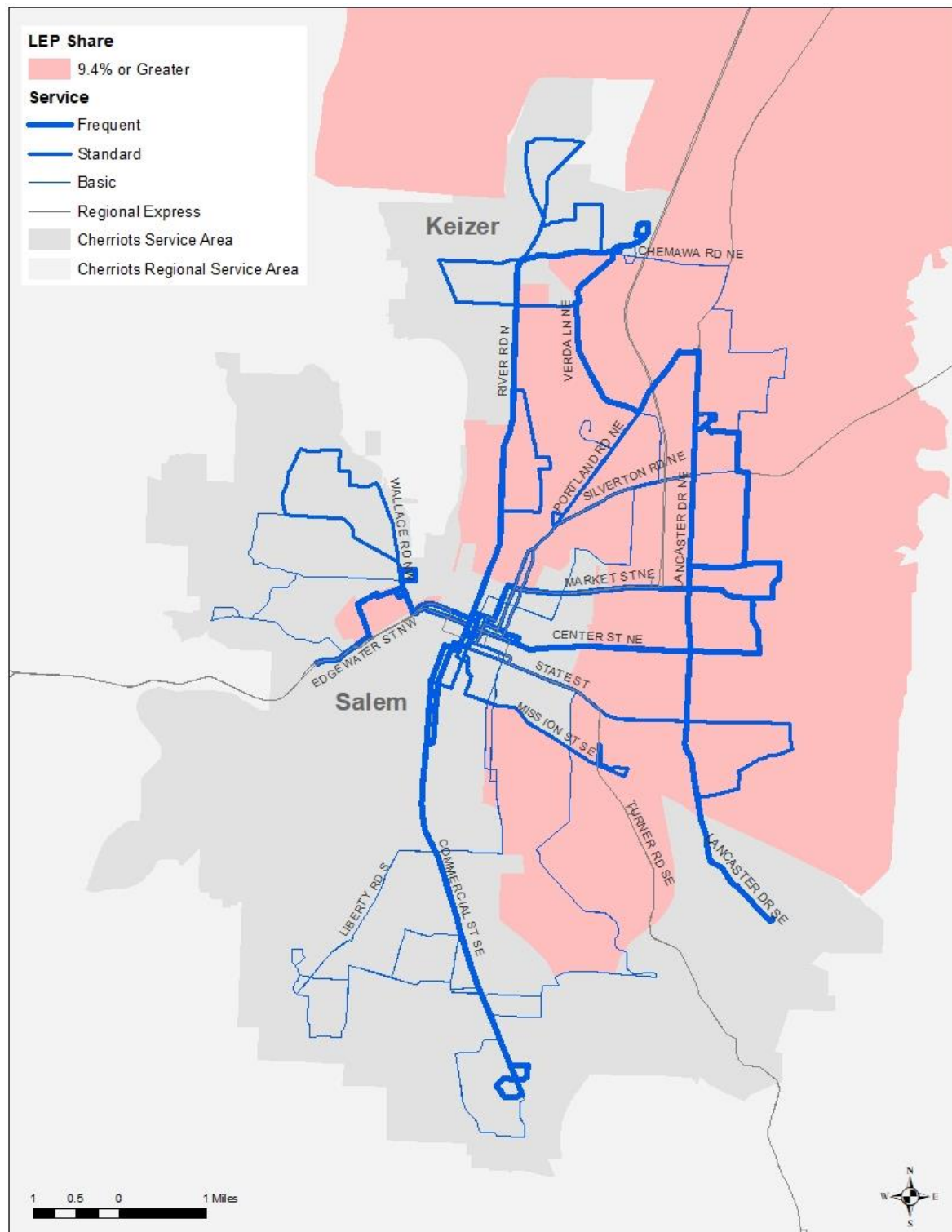
While specific areas within the Salem-Keizer area have higher residential concentrations of LEP populations, the use of the transit system by LEP populations is not limited to the locations of their homes. Employment, medical services, government offices, and shopping opportunities are widespread throughout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

Figure I- 1. Census tracts in Marion and Polk counties with greater than average Limited English Proficiency (LEP) populations



Source: ACS 2014-18, Table C16001.

Figure I- 2. Census tracts near the Salem-Keizer UGB with greater than average Limited English Proficiency (LEP)



Source: ACS 2014-18, Table C16001

Committee membership and recruitment

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

Table I- 2. Race and ethnicity of members of non-elected committees

Race and Ethnicity	Marion and Polk Counties Population		Special Transportation Fund Advisory Committee		Budget Committee		Statewide Transportation Improvement Fund Advisory Committee		Citizens Advisory Committee	
	Count	Share	Count	Share	Count	Share	Count	Share	Count	Share
White*	290,545	67.2%	7	87%	7	87%	7	87%	10	91%
Hispanic	105,952	24.5%	0	0%	1	13%	1	13%	1	9%
Asian*	8,801	2.0%	0	0%	0	0%	0	0%	0	0%
Black*	4,460	1.0%	1	13%	0	0%	0	0%	0	0%
Native Hawaiian and Pacific Islander*	3,766	0.9%	0	0%	0	0%	0	0%	0	0%
American Indian and Alaskan Native*	4,353	1.0%	0	0%	0	0%	0	0%	0	0%
Other*	14,225	3.3%	0	0%	0	0%	0	0%	0	0%
All	432,102	100%	8	100%	8	100%	8	100%	11	100%

Source: ACS 2018 1-Year Estimate, Table C03002. *Excludes Hispanic Population

The population of the SAMTD service area averages 31.8 percent minority according

to the U.S. Census American Community Survey 5-year estimate (2014-2018). SAMTD has a goal over the next three years to increase participation on the non-elected committees to match or exceed this demographic average.

Subrecipient monitoring

SAMTD is the primary recipient for Federal Section 5310 dollars for the Salem-Keizer UGB and is the State Special Transportation Fund (STF) agency for Marion and Polk counties. Currently, SAMTD has entered into agreements with two non-profit organizations to award them STF and 5310 grant dollars. SAMTD also has agreements with two cities in Marion County to provide public transportation services. The STF and 5310 grant funds are pass-through funds from the Oregon Department of Transportation (ODOT). SAMTD also receives 5310 funds directly from the FTA, and currently has one external subrecipient for those grant funds.

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

The two non-profit organizations receiving STF and 5310 pass-through grant funds are Legacy Silverton Medical Center and Salem Health Foundation (West Valley Hospital). The two cities are the City of Woodburn and the City of Silverton. None of the current subrecipients have had any Title VI lawsuits or complaints related to transportation-related services since the date of the last Title VI Program submittal (May 2017). Legacy Silverton Medical Center and West Valley Hospital have dedicated staff who administer their civil rights and non-discrimination policies. Due to the fact that they are hospitals which accept Federal funds for their daily operations, they must be able to serve anyone and do not discriminate based on race, color, or national origin, including LEP persons. Copies of the subrecipient Title VI documents detailing their program policies can be found in Attachment I.

Facilities siting and construction

No new major facilities were constructed since June 2017 by SAMTD. However, one facility is in the planning stages.

South Salem Transit Center

The project consists of the construction of a transit center in the south of Salem. Although a preliminary design was developed, the project hinged on an agreement with a private property owner which never fully agreed to the project before the project funding was cancelled due to a grant time constraint. At this point in time, SAMTD is in the process of procuring the services of a consulting firm to develop new alternatives for the site and will include a Title VI equity analysis and/or an environmental justice analysis to ensure an equitable decision for the site.

Major service change and fare change equity analyses

SAMTD considers possible equity impacts in developing potential service and fare changes, and evaluates proposals for major service changes and any fare changes for potential adverse effects, disparate impacts, and/or disproportionate burdens.

Since the time of the last Title VI Program submittal SAMTD has implemented several improvements to service and one change to fares. The four reports noted below cover the equity analyses of all major service changes and fare changes implemented since June 2017, and are provided as Attachments J & K, along with corresponding documentation of the board's consideration, awareness, and approval of each.

- **Phase I “A Better Cherriots” Title VI equity analysis**
 - Board approval at the May 24, 2018 Board Meeting
- **2019 fare change public engagement and equity analysis**
 - Board approval at the January 24, 2019 Board Meeting

Board approval of the 2020 Title VI Program update

The board approved the 2020 Title VI Program at the May 28, 2020 Board Meeting by adoption of Board Resolution #2020-01. A copy of the signed resolution is included as Attachment A.

Part II: Title VI policies

This section provides the following policies, as approved by the SAMTD General Manager.

- **Service change policies**
 - Major Service Changes Policy
 - Disparate Impact for Service Changes Policy
 - Disproportionate Burden for Service Changes Policy
- **Fare change policies**
 - Fare Change Policy
 - Disparate Impact for Fare Changes Policy
 - Disproportionate Burden for Fare Changes Policy

Each officially adopted policy is presented in Attachment L.

Major Service Change Policy

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

All changes in service which are considered a major service change are subject to a Title VI equity analysis prior to board approval of the service change.

Major service change definition

SAMTD defines a major service change as:

1. Either a reduction or an expansion in service of:
 - a. 15 percent or more of the number of transit route miles based on the miles of an average round-trip of the route (this includes routing changes where route miles are neither increased nor reduced (i.e., re-routes)), or;

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

A major service change occurs whether the above thresholds are met:

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

Public hearing requirements

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

Exemptions

The following service changes are exempt:

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

Disparate Impact for Service Changes Policy

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

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

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

In the event the proposed action has an adverse impact that affects minority populations more than non-minority populations at a level that exceeds the

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

From the Title VI Circular

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

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

Adverse effects analysis

Adverse effects of major service changes are defined as:

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

- b. One half mile for bus stops served by four or more buses per hour during peak times, as well as for all Cherriots Regional express service.

Disparate impact analysis

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

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

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

Avoid, minimize, mitigate, or justify

Upon determination of a disparate impact, SAMTD will either:

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

Disproportionate Burden for Service Changes Policy

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

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

From the Title VI Circular

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

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

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

and benefits of major service changes.

Adverse effects analysis

Adverse effects of service changes are defined as:

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

Disproportionate burden analysis

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

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

the percentage of Marion and Polk counties' non-low-income population that is impacted. If the percentage of the low-income population impacted is at least 20 percent greater than the percentage of the non-low-income population impacted (e.g., 12 percent compared to 10 percent), the overall impact of changes (burden) will be considered disproportionate.

2. In the event of service improvements:

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

Avoid, minimize, mitigate, or justify

Upon determination of disproportionate burden, SAMTD will either:

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

Fare Changes Policy

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

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

Fare change definition

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

Public hearing requirements

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

description of the proposed fare change, and the date, time, and place of the hearing.

Exemptions

The following fare changes are exempt:

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

Disparate Impacts for Fare Changes Policy

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

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

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

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

From the Title VI Circular

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

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

Adverse effects and disparate impact analysis

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

Avoid, minimize, mitigate, or justify

Upon determination of a disparate impact, SAMTD will either:

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

Disproportionate Burden for Fare Changes Policy

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

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

From the Title VI Circular

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

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

alternative that would serve the same objectives and with a more equitable impact. Otherwise, SAMTD will take measures to minimize or mitigate the adverse impact of the proposed action.

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

Adverse effects and disproportionate burden analysis

For fare changes, a potential disproportionate burden is noted when the percentage of trips by low-income riders using a fare option, in combination with the percentage price change for that option, has an impact that exceeds the comparable impact on non-low-income riders.

Differences in the use of fare options between low-income populations and other populations include all such differences that are documented as statistically significant at the 95 percent confidence level.

Avoid, minimize, mitigate, or justify

Upon determination of disproportionate burden, SAMTD will either:

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

Public outreach to establish Title VI policies

SAMTD staff engaged two groups representing minority and low-income populations in Marion and Polk counties in order to determine the appropriate thresholds that define a major service change and the definition of “low-income” populations.

Special Transportation Fund Advisory Committee (STFAC)

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

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

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

Results of discussions

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

For major service changes, both groups preferred a lower threshold than the previous rate of 25 percent. Using their feedback as a guide, staff determined that a 15 percent threshold would be more appropriate for the region.

Both groups believed the disparate impact analysis and the disproportionate burden analysis thresholds of 7 or 8 percentage points should be lowered as much as possible. Staff determined that a level of 5 percentage point difference between minority and non-minority populations would be more appropriate for the current networks operated by SAMTD.

Additionally, both groups agreed staff's proposal of changing the definition of "low-income population" from those earning 100 percent of the Federal Poverty Level (FPL) or less to those earning 150 percent of FPL or less may not be going far

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

enough. Some suggested the threshold should be 185 percent of FPL or less to align with the Supplemental Nutrition Assistance Program (SNAP) definitions. Staff followed up with more research on how other transit agencies define “low-income populations” and determined most use 100 percent of FPL. Also, staff analyzed which block groups would be considered “low income” versus “higher income” given the three possible thresholds, and found little difference in how block groups would be categorized. As a result, staff decided to maintain our proposed threshold of 150 percent FPL or less.

The SAMTD Statewide Transportation Improvement Fund Advisory Committee (STIFAC) recommended that SAMTD use 200 percent FPL to define low-income status when developing the service plans for any service enhancements that result from the new State of Oregon STIF funding, which altered service beginning in September 2019. In response, Policy #709 “Disproportionate Burden for Service Changes,” was revised to define low-income populations as those households making 200 percent or less of FPL each year.

Part III: Systemwide service standards and policies

In 2011, the board approved a strategic plan with the following values:

- Safety
- Service Excellence
- Communication
- Innovation
- Accountability

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

Standards:

- Service availability
- Service frequency
- On-time performance
- Vehicle loads

Policies:

- Amenity placement
- Vehicle assignment

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

Service availability

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

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

Service frequency

Service day periods

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

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

Service day types

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

Consistent frequency

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

Route types

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

1. **Frequent** - 15-minute frequency routes provide reliable, frequent service along corridors. Routes with 15-minute frequency should be deployed with an expectation of relatively high ridership, above 25 boardings per revenue hour.
2. **Standard** - 30-minute frequency routes provide reliable connectivity to transit centers or to 15-minute frequency routes. Routes with 30-minute frequency should be deployed with an expectation of moderately high ridership, above 20 boardings per revenue hour.
3. **Basic** - Often referred to as “coverage service”, 60-minute frequency routes provide service coverage over large areas and provide critical life-line connectivity to many sections of the community. Routes with 60-minute frequency should be deployed with an expectation of moderate ridership, above 10 boardings per revenue hour.
4. **Commuter/Tripper** - Commuter and tripper routes provide connectivity to a specific, remote location or provide service at particular times when significant travel demand is expected. Commuter/Tripper routes typically have few trips throughout the day. Commuter/Tripper routes should be deployed with an expectation of moderately high ridership, above 20 boardings per revenue hour.

On-time performance

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

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

Vehicle loads

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

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

Table III- 1. Vehicle capacities and maximum load factors

Vehicle Type	Passenger Capacities			
	Seated	Standing	Maximum Capacity	Maximum Load Factor
35-ft high floor	33	0	33	1.0
35-ft. low floor	31	15	46	1.5
40-ft. low floor	38	19	57	1.5
40-ft. commuter	33	0	33	1.0

Transit operators are required to radio dispatch if they have a full load and must

pass up anyone. SAMTD considers a full bus to have a load factor of 1.5 for Cherriots Local routes, and 1.0 for Cherriots Regional express routes and any local commuter express routes (currently, just Route 1X). This load standard does not apply to special event service or shuttles.

Amenity placement

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

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

Vehicle assignment

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

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

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

In addition, SAMTD operates two commuter type buses for its 1X local commuter express service between Salem and Wilsonville. These buses have commuter style

seats and luggage racks. Ridership demand dictates the size of the bus to be used. Age, type of the bus, and other factors are not relevant to the assignment of these vehicles.

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

Part IV: Service monitoring

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

Specifically SAMTD monitors the following service and performance metrics:

1. Minority and non-minority routes
2. Service availability
3. Service frequency and span
4. On-time performance
5. Vehicle loads
6. Stop amenities
7. Vehicle assignment

Minority and non-minority routes

"Minority" routes, as defined by the FTA, are routes that provide at least one third of their service (measured by revenue hours) in block groups that are above-average minority population. For Cherriots Regional and local commuter express routes, SAMTD defines minority routes as those providing bus stops in block groups that are above-average minority population. "Non-minority" routes are all others.

Currently SAMTD operates a total of 27 fixed routes. Of these, 17 routes are considered minority routes. The remaining 10 routes are considered non-minority routes. As of January 2020, minority routes accounted for 77.1 percent of SAMTD system service on weekdays (measured by revenue hours), and slightly less, at 76.8 percent, of the SAMTD system on Saturdays. SAMTD generally aligns service with mobility needs and ridership, thus routes serving areas with above average minority populations typically have higher ridership and therefore a higher overall level of service than non-minority routes.

Service availability

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

Table IV- 1. Availability of service

	Marion and Polk Counties	Number and Percentage within One-half Mile Walk of Bus	
<i>Minorities</i>	132,296	123,343	93.2%
<i>Non-Minorities</i>	284,684	248,689	87.4%
<i>All</i>	416,980	372,032	89.2%

Findings

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

Service frequency and span

The analysis of service frequency and span is by type of service. Tables IV-2 through IV-6 present the frequency and span for each route on weekdays and Saturdays comparing each type of service (Cherriots Local, Cherriots Local commuter express, and Cherriots Regional express) individually. Tables IV-7 through IV-11 compare the frequency and span of service between minority routes and non-minority routes by day of the week and type of service. The following definition is used for time bands in these tables:

1. AM (start of service until 8:59 a.m.)
2. Mid-day (9:00 a.m. until 1:59 p.m.)
3. PM (2:00 p.m. until 6:59 p.m.)
4. Evening (7:00 p.m. until end of service)

Table IV- 2. Weekday headways and span of service of Cherriots Local routes (minority routes shown in bold with shaded backgrounds)

Route	Route Name	Average Headways				Service Start	Service End	Span (Hrs)
		AM	Mid	PM	Eve			
2	Market / Brown	16.7	15	15	42.9	5:55 AM	11:22 PM	17.45
3	Portland Road	30	30	30	42.9	6:01 AM	11:27 PM	17.43
4	State Street	30	30	30	42.9	5:35 AM	11:28 PM	17.88
5	Center Street	16.4	15	15	42.9	5:52 AM	11:21 PM	17.48
6	Fairview Industrial	60	60	60	60	5:30 AM	9:40 PM	16.17
7	Mission Street	30	30	30	30	5:44 AM	11:14 PM	17.50
8	12th / Liberty via Red Leaf	60	60	60	60	5:41 AM	11:34 PM	17.88
9	Cherry / River Road	30	30	30	30	5:40 AM	9:35 PM	15.92
11	Lancaster / Verda	16.4	15	15	30	5:53 AM	11:50 PM	17.95
12	Hayesville Drive	60	60	60	60	6:30 AM	9:17 PM	14.78
13	Silverton Road	30	30	30	40	5:34 AM	10:47 PM	17.22
14	Windsor Island Road	30	30	30	30	6:00 AM	9:22 PM	15.37
16	Wallace Road	60	60	60	60	5:25 AM	9:54 PM	16.48
17	Edgewater Street	15	15	15	42.9	5:33 AM	11:17 PM	17.73
18	12th / Liberty via Lone Oak	60	60	60	60	6:10 AM	11:06 PM	16.93
19	Broadway / River Road	16.7	15	15	42.9	5:54 AM	11:19 PM	17.42
21	South Commercial	16.7	15	15	42.9	5:57 AM	11:22 PM	17.42
22	Library Loop	30	30	30	30	5:53 AM	9:05 PM	15.20
23	Lansing / Hawthorne	60	60	60	60	6:25 AM	9:20 PM	14.92
26	Glen Creek / Orchard Hts.	60	60	60	60	6:00 AM	9:03 PM	15.05
27	Glen Creek / Eola	60	60	60	60	5:30 AM	9:37 PM	16.12

Table IV- 3. Weekday round trips and span of service of the Cherriots Local commuter express route (Route 1X)

Route	Route Name	Daily Round trips	Service Start	Service End	Span (Hrs)
1X	Wilsonville / Salem Express*	16 daily round trips	5:00 AM	7:22 PM	11.92

* Includes 6 round trips operated by Cherriots and ten operated by The City of Wilsonville (SMART)

Table IV- 4. Weekday round trips and span of service of Cherriots Regional express routes (minority routes shown in bold with shaded backgrounds)

Route	Route Name	Daily Round Trips	Service Start	Service End	Span (Hrs)
10X	Woodburn / Salem Express	8 daily round trips	6:00 AM	8:17 PM	14.28
20X	N. Marion Co. / Salem Exp.	5 daily round trips	6:13 AM	8:20 PM	14.12
30X	Santiam / Salem Express	4 daily round trips	5:41 AM	7:11 PM	13.40
40X	Polk County / Salem Express	8 daily round trips	5:57 AM	9:28 PM	15.52
50X	Dallas / Salem Express	4 daily round trips	6:17 AM	5:37 PM	4.88

Table IV- 5. Saturday headways and span of service of Cherriots Local routes (minority routes shown in bold with shaded backgrounds)

Route	Route Name	Average Headway				Service Start	Service End	Span (Hrs)
		AM	Mid	PM	Eve			
2	Market / Brown	30	30	30	60	6:26 AM	9:22 PM	14.93
3	Portland Road	60	60	60	60	6:27 AM	9:27 PM	15.00
4	State Street	60	60	60	60	6:06 AM	9:28 PM	15.37
5	Center Street	30	30	30	60	6:22 AM	9:21 PM	14.98
6	Fairview Industrial	60	60	60	60	6:24 AM	9:40 PM	16.27
7	Mission Street	30	30	30	30	6:44 AM	9:14 PM	14.50
8	12th / Liberty via Red Leaf	60	60	60	60	6:41 AM	9:34 PM	14.88
9	Cherry / River Road	60	60	60	60	6:10 AM	9:35 PM	15.12
11	Lancaster / Verda	30	30	30	30	6:17 AM	9:46 PM	15.48
13	Silverton Road	60	60	60	60	6:57 AM	8:47 PM	13.83
16	Wallace Road	60	60	60	60	6:31 AM	8:54 PM	14.38
17	Edgewater Street	30	30	30	30	6:26 AM	9:124PM	14.97
18	12th / Liberty via Lone Oak	60	60	60	60	6:10 AM	9:06 PM	14.93
19	Broadway / River Road	30	30	30	30	6:24 AM	9:19 PM	14.92
21	South Commercial	30	30	30	30	6:27 AM	9:22 PM	14.92

Table IV- 6. Saturday round trips and span of service of Cherriots Regional express routes (minority routes shown in bold with shaded backgrounds)

Route	Route Name	Daily Round Trips	Service Start	Service End	Span (Hrs)
10X	Woodburn / Salem Express	3.5 daily round trips	7:26 AM	6:25 PM	10.98
20X	N. Marion Co. / Salem Exp.	3.5 daily round trips	8:11 AM	6:08 PM	9.95
30X	Santiam / Salem Express	2 daily round trips	8:00 AM	7:35 PM	11.58
40X	Polk County / Salem Express	4 daily round trips	7:43 AM	7:39 PM	11.93

Tables IV-7 and IV-8 compare the frequency and span of service of Cherriots Local minority and non-minority routes.

Table IV- 7. Comparison of weekday headways and span of service for Cherriots Local minority and non-minority routes

Route Type	Route Classification	Average Headway				Average Service Start	Average Service End	Average Span (Hrs)
		AM	Mid	PM	Eve			
<i>Cherriots Local Routes</i>	<i>Minority Routes</i>	31.5	31.1	31.1	42.7	5:51 AM	10:39 PM	16.80
	<i>Non-Minority Routes</i>	49.5	49.3	49.3	53.3	5:48 AM	10:14 PM	16.44
	<i>All Routes</i>	37.5	37.1	37.1	46.2	5:50 AM	10:31 PM	16.68

Table IV- 8. Comparison of Saturday headways and span of service for Cherriots Local minority and non-minority routes

Route Type	Route Classification	Average Headway				Average Service Start	Average Service End	Average Span (Hrs)
		AM	Mid	PM	Eve			
<i>Cherriots Local Routes</i>	<i>Minority Routes</i>	43.6	43.6	43.6	49.1	6:25 AM	9:23 PM	15.03
	<i>Non-Minority Routes</i>	52.5	52.5	52.5	52.5	6:27 AM	9:14 PM	14.78
	<i>All Routes</i>	46.0	46.0	46.0	50.0	6:26 AM	9:21 PM	14.97

Table IV-9 shows the daily round trips and span of service of the Cherriots Local commuter express service, Route 1X. Since there is only one route in this category, there is no comparison between minority or non-minority routes necessary.

Table IV- 9. Weekday headways and span of service for Cherriots Local commuter express non-minority route (Route 1X)

Route Type	Route Classification	Daily Round Trips	Average Service Start	Average Service End	Average Span (Hrs)
<i>Cherriots Local Commuter Express Route</i>	<i>Minority Routes</i>	-	-	-	-
	<i>Non-Minority Routes*</i>	16 daily round trips	5:00 AM	7:22 PM	14.37
	<i>All Routes</i>	16 daily round trips	5:00 AM	7:22 PM	14.37

*Route 1X is the only service in this category at this time, but future urban to urban commuter express services will be compared here.

Tables IV-10 and IV-11 compare the daily round trips and span of service for Cherriots Regional express routes designated as minority or non-minority routes.

Table IV- 10. Comparison of weekday average daily round trips and span of service for Cherriots Regional minority and non-minority express routes

Route Type	Route Classification	Average Daily Round Trips	Average Service Start	Average Service End	Average Span (Hrs)
<i>Cherriots Regional Express Routes</i>	<i>Minority Routes</i>	7	6:03 AM	8:41 PM	14.64
	<i>Non-Minority Routes</i>	4	5:59 AM	6:24 PM	9.14
	<i>All Routes</i>	5.8	6:01 AM	7:46 PM	12.44

Table IV- 11. Comparison of Saturday average daily round trips and span of service for Cherriots Regional minority and non-minority express routes

Route Type	Route Classification	Average Daily Round Trips	Average Service Start	Average Service End	Average Span (Hrs)
<i>Cherriots Regional Express Routes</i>	<i>Minority Routes</i>	3.67	7:46 AM	6:25 PM	10.95
	<i>Non-Minority Routes</i>	2.00	8:00 AM	7:35 PM	11.58
	<i>All Routes</i>	3.25	7:50 AM	6:56 PM	11.11

Findings

- For weekday and Saturday Cherriots Local service, minority routes have smaller headways (serve stops more frequently) than service on non-minority routes.
- Likewise, for Cherriots Local service, the span of service is slightly greater for minority routes than non-minority routes (16.80 hours and 16.44 hours, respectively for weekdays and 15.03 hours and 14.78 hours, respectively for Saturdays). Therefore, there is no disparate impact to minority populations due to differences in frequency or span of service on weekdays or Saturdays for the Cherriots Local service.
- There is only one Cherriots Local commuter service (Route 1X) in the system today, so comparisons cannot be made for this non-minority route.
- For weekday Cherriots Regional express service, minority routes have a greater number of average daily round trips than the non-minority routes (7 versus 4 average round trips per day).
- The span of service is also greater for the Cherriots Regional express routes defined as minority routes than the non-minority routes on weekdays (14.64 hours versus 9.4 hours, respectively).
- On Saturdays, the span of service is greater for the minority Cherriots Regional express routes than that of the minority route (10.95 hours versus 7.17 hours, respectively). Note the span of service for Route 30X does not include the middle of the day (11:36 a.m. to 3:59 p.m.) when it is not running.

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

On-time performance

SAMTD currently is in the process of installing a Computer Aided Dispatch – Automatic Vehicle Location (CAD-AVL) system on every bus. CAD-AVL will continually monitor On-Time Performance (OTP) for every time point, but since the buses are still in transition with this update to the Title VI program, staff continued to use a manual method of recording the OTP. This section will be updated after CAD-AVL is operational for at least twelve months on all of the buses. For the 2020 update, OTP was measured at the end of most routes for three days of service in October 2019. Buses were considered to be “on time” if they arrived up to 4 minutes and 59 seconds later than their scheduled arrival time. Average OTP is weighted by revenue hours by route.

Table IV- 12. Weekday on-time performance of Cherriots Local and Cherriots Regional routes (Oct. 2019) (minority routes shown in bold with shaded backgrounds)

Route	Route Name	Percent of Trips On Time				
		AM	Mid	PM	Eve	Overall
2	Market / Brown	78%	86%	87%	93%	85%
3	Portland Road	95%	100%	87%	100%	94%
4	State Street	100%	97%	97%	100%	98%
5	Center Street	95%	98%	92%	100%	95%
6	Fairview Industrial	100%	100%	80%	100%	93%
7	Mission Street	96%	93%	90%	100%	94%
8	12th / Liberty via Red Leaf	100%	93%	88%	100%	94%
9	Cherry / River Road	82%	100%	87%	60%	100%
10X	Woodburn / Salem Express	100%	83%	89%	---	92%
11	Lancaster / Verda	91%	90%	95%	88%	95%
12	Hayesville Drive	100%	100%	100%	100%	100%
13	Silverton Road	91%	96%	100%	72%	100%
14	Windsor Island Road	100%	90%	83%	90%	90%
16	Wallace Road	100%	100%	80%	100%	94%
17	Edgewater Street	98%	100%	100%	100%	99%
18	12th / Liberty via Lone Oak	100%	100%	80%	100%	94%
19	Broadway / River Road	90%	88%	97%	100%	92%
20X	N. Marion Co. / Salem Exp.	100%	100%	100%	100%	100%
21	South Commercial	100%	100%	96%	100%	99%
22	Library Loop	88%	97%	70%	100%	86%
23	Lansing / Hawthorne	100%	93%	100%	100%	98%
30X	Santiam / Salem Express	100%	100%	100%	---	100%
40X	Polk County / Salem Express	67%	100%	78%	100%	79%
50X	Dallas / Salem Express	100%	---	100%	---	100%

**Excludes Routes 26 and 27 since cameras are not available at the West Salem Transit Center in order to perform end-of-route OTP monitoring.

Table IV- 13. Weekday on-time performance for Cherriots Local commuter express (Oct. 2019) (minority routes shown in bold with shaded backgrounds)

Route	Route Name	Percent of Trips On Time				
		AM	Mid	PM	Eve	Overall
1X	Wilsonville / Salem Express*	100%	—	86%	—	93%

*Cherriots trips only; OTP of SMART trips are not included.

Table IV- 14. Saturday on-time performance of Cherriots Local and Cherriots Regional routes (Oct. 2019) (minority routes shown in bold with shaded backgrounds)

Route	Route Name	Percent of Trips On Time				
		AM	Mid	PM	Eve	Overall
2	Market / Brown	100%	50%	80%	83%	74%
3	Portland Road	89%	100%	93%	100%	96%
4	State Street	100%	93%	100%	100%	98%
5	Center Street	100%	100%	93%	100%	98%
6	Fairview Industrial	100%	100%	100%	100%	100%
7	Mission Street	100%	97%	90%	100%	95%
8	12th / Liberty via Red Leaf	100%	87%	100%	100%	95%
9	Cherry / River Road	100%	87%	100%	100%	96%
10X	Woodburn / Salem Express	100%	100%	83%	—	90%
11	Lancaster / Verda	100%	78%	86%	50%	83%
13	Silverton Road	100%	100%	100%	100%	100%
16	Wallace Road	100%	100%	100%	100%	100%
17	Edgewater Street	100%	100%	100%	100%	100%
18	12th / Liberty via Lone Oak	100%	100%	100%	100%	100%
19	Broadway / River Road	100%	93%	85%	100%	92%
20X	N. Marion Co. / Salem Exp.	100%	100%	100%	—	100%
21	South Commercial	100%	100%	96%	100%	99%
30X	Santiam / Salem Express	—	100%	100%	—	100%
40X	Polk County / Salem Express	100%	100%	67%	100%	67%

Table IV- 15. Comparison of on-time performance for weekday Cherriots Local minority and non-minority routes

Route Classification	Average Percent of Trips on Time				
	AM	Mid	PM	Eve	Overall
<i>Minority Routes</i>	93%	94%	89%	98%	93%
<i>Non-Minority Routes</i>	99%	98%	88%	100%	95%
<i>All Routes</i>	94%	95%	89%	98%	93%

Table IV- 16. Comparison of on-time performance for Saturday Cherriots Local minority and non-minority routes

Route Classification	Average Percent of Trips on Time				
	AM	Mid	PM	Eve	Overall
<i>Minority Routes</i>	99%	88%	92%	87%	92%
<i>Non-Minority Routes</i>	100%	96%	99%	100%	98%
<i>All Routes</i>	99%	90%	93%	90%	93%

Table IV- 17. Comparison of on-time performance for weekday Cherriots Regional minority and non-minority routes

Route Classification	Average Percent of Trips on Time				
	AM	Mid	PM	Eve	Overall
<i>Minority Routes</i>	87%	94%	88%	100%	89%
<i>Non-Minority Routes</i>	100%	100%	100%	—	100%
<i>All Routes</i>	91%	95%	91%	100%	92%

Table IV- 18. Comparison of on-time performance for Saturday Cherriots Regional minority and non-minority routes

Route Classification	Average Percent of Trips on Time				
	AM	Mid	PM	Eve	Overall
<i>Minority Routes</i>	100%	100%	83%	100%	94%
<i>Non-Minority Routes</i>	—	100%	100%	—	100%
<i>All Routes</i>	100%	100%	87%	100%	95%

Findings

- Weekday OTP for Cherriots Local minority routes is 93 percent on average, slightly lower than the OTP rate for non-minority routes, which is 95 percent.
- Saturday OTP for Cherriots Local minority routes is 92 percent on average, slightly lower than the OTP rate for non-minority routes, 98 percent.
- Weekday OTP for Cherriots Regional minority routes is 89 percent on average, eleven percent lower than the OTP rate for non-minority routes, which was 100 percent.
- Saturday OTP for Cherriots Regional minority routes is 94 percent on average, six percent lower than the OTP rate for non-minority routes, which was also 100 percent

None of the differences between the OTP of minority routes and non-minority routes are more than the systemwide disparate impact threshold of 20 percent. Therefore, there are no disparate impacts to minority populations in regards to OTP.

Vehicle Loads

Vehicle loads are examined to determine whether buses are overcrowded. Table IV-19 shows vehicle capacities of the newest buses in the Cherriots fleet (purchased in 2018 and later). Older vehicles have slightly greater capacities due to a different seat configuration primarily governed by the size of the ADA wheelchair tie-down areas, which are larger in the newer buses.

Table IV- 19. Vehicle capacities and maximum load factors of the newest Cherriots buses

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

Tables IV-20 through IV-22 compare average vehicle loads for minority and non-minority routes. Data was collected by automatic passenger counters from January through March 2017 and will not be available until the end of 2020 when it is expected that the new CAD/AVL system will be fully operational on Cherriots Local (and perhaps Cherriots Regional) buses. Average maximum load factors, defined by the average load to seated capacity ratio, are weighted by revenue hours of each route in these tables.

Table IV- 20. Average maximum vehicle loads and load factors by route, weekdays only (minority routes shown in bold with shaded backgrounds)

Route	Route Name	Bus Type	Average Max Load	Average Max Load Factor
2	Market / Brown	35' low floor	20	0.42
3	Portland Road	40' low floor	23	0.40
4	State Street	40' low floor	27	0.47
5	Center Street	35' low floor	20	0.42
6	Fairview Industrial	35' low floor	21	0.44
7	Mission Street	35' low floor	12	0.25
8	12th / Liberty via Red Leaf	35' low floor	19	0.40
9	Cherry / River Road	35' low floor	12	0.25
11	Lancaster / Verda	40' low floor	22	0.39
12	Hayesville Drive	35' low floor	10	0.21
13	Silverton Road	40' low floor	13	0.23
14	Windsor Island Road	35' low floor	4	0.08
16	Wallace Road	35' low floor	10	0.21
17	Edgewater Street	35' low floor	10	0.21
18	12th / Liberty via Lone Oak	35' low floor	22	0.46
19	Broadway / River Road	40' low floor	18	0.32
21	South Commercial	40' low floor	25	0.44
22	Library Loop	40' low floor	4	0.07
23	Lansing / Hawthorne	35' low floor	7	0.15

**Excludes Routes 10X, 20X, 26, 27, 30X, 40X, and 50X since these data were taken in 2016 with data from the old APCs which no longer function on the buses.

Table IV- 21. Average maximum vehicle load and load factor for Cherriots Local commuter express route, weekdays only

Route	Route Name	Bus Type	Average Max Load	Average Max Load Factor
1X	Wilsonville / Salem Express*	40' commuter	23	0.62

Table IV- 22. Comparison of average vehicle loads for minority and non-minority routes of Cherriots Local service and Cherriots Regional express services

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

Findings

- On Cherriots Local routes, the average maximum load factor for minority routes (0.27), is less than that for non-minority routes (0.34). Both are far less than the standard of 1.5.
- The average max load for Cherriots Local commuter express route (0.62) is less than the standard of 1.0. Currently SAMTD only has load data for Route 1X, which is a non-minority route. No data has been collected on Routes 10X-50X because there are not automatic passenger counters on those buses. In future analyses, SAMTD will be able to report on the differences in average max load factors for minority routes and non-minority routes on the Cherriots Local commuter express and Cherriots Regional express services.

Examining the data above where no routes are over their maximum allowable load factors, it can be concluded that there are no disparate impacts to minority populations in regard to vehicle loads.

Stop amenities

SAMTD analyzed the distribution of stop amenities in order to identify potential disparities. Table IV-23 shows the share of each amenity in block groups with higher-than-regional-average rates of minority populations.

Table IV- 23. Distribution of amenities in minority block groups versus the total service area

Amenity	Total in Service Area	Located In Minority Census Tracts	
		Count	Percent
Signs, Maps, and Schedules	673	331	49.2%
Shelters	134	78	58.2%
Seating	159	84	52.8%
Waste Receptacles	202	101	50.0%

Findings

- Over half of SAMTD's shelters, seating, and waste receptacles are located in minority block groups.
- Only 49 percent of signs, maps, and schedules are located in minority block groups.

Although only 49 percent of signs, maps, and schedules are located in minority block groups, this is simply a function of the placement of stops, every one of which has a sign. There are more bus stops located in non-minority block groups, but that is not a function of the level of service in those areas.

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

Vehicle assignment

In regard to assessing the results of SAMTD's vehicle assignment practices in the context of Title VI, the expectation is that the average age of vehicles on minority routes should not be more than the average age of vehicles on non-minority routes. The average age is calculated by weighing the age of the vehicles by the number of hours in service. These data are unavailable in May 2020 due to the fact that the CAD-AVL systems have not been installed on the buses yet. Once the systems are installed in the summer of 2020, it will then be possible to monitor the placement of vehicles on Cherriots routes and control the distribution of vehicles.

Summary

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

Part V: Demographic analysis

SAMTD uses demographic data to assess equity in distribution of services, facilities, and amenities in relation to minority, low-income, and limited English proficient populations. Such data informs SAMTD in the early stages of service, facilities, and programs planning and enables SAMTD to monitor ongoing service performance, analyze the impacts of policies and programs on these populations, and take appropriate measures to avoid or mitigate potential disparities. SAMTD develops maps and comparative charts to perform this analysis, relying on both ridership and population data within the service area. Please note that block groups in rural areas appear to be large areas of populations, but the populations are greatest in the cities and towns, not agricultural areas. Therefore, the rural populations may appear large, but are actually quite small.

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

- 2014-2018 American Community Survey (ACS)
- 2016 Cherriots On-Board Rider Survey

This section includes the following items:

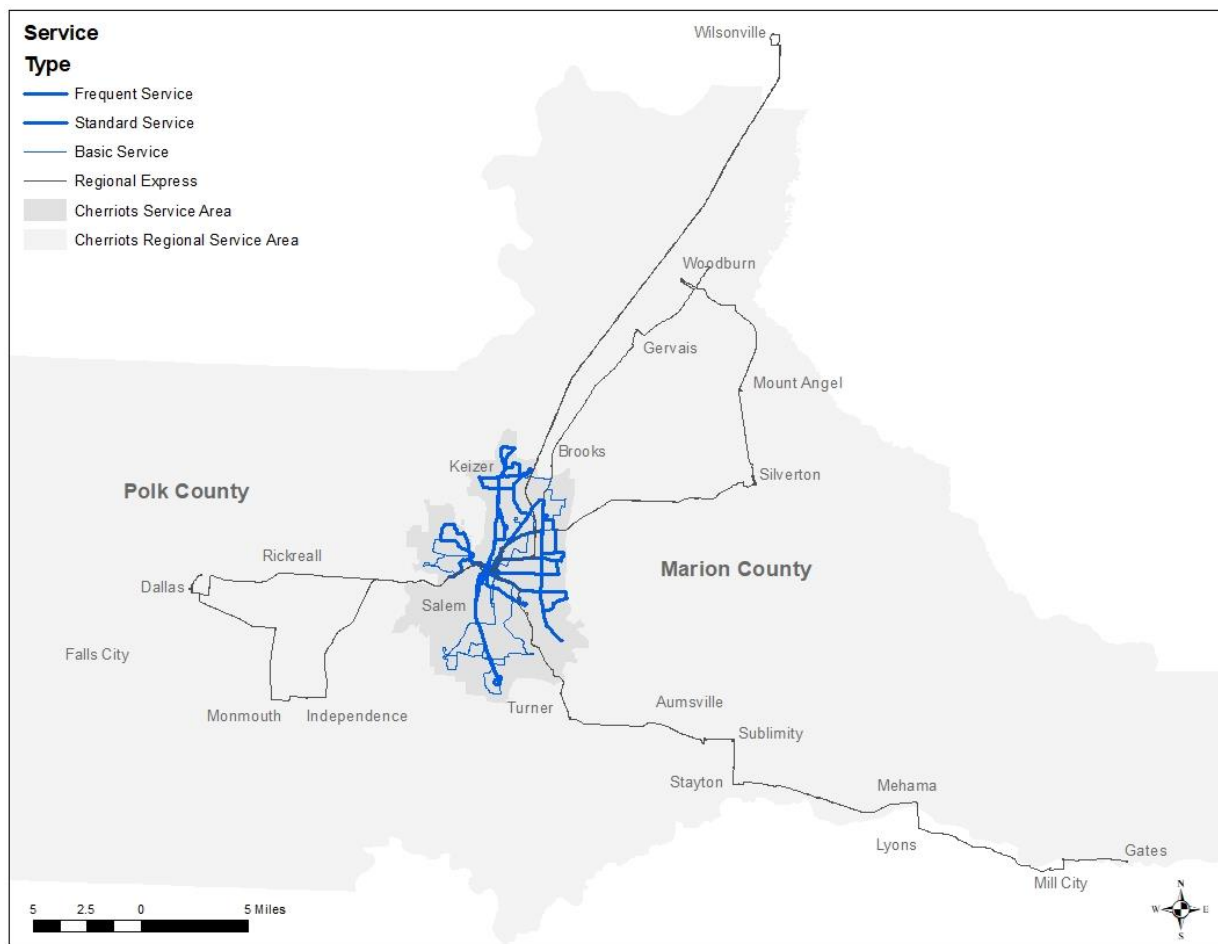
1. Service and service area
2. Service availability
3. Minority population
4. Low-income population
5. Limited English Proficient (LEP) population
6. Facilities
7. Amenities – signs, maps, and schedules
8. Amenities – shelters
9. Amenities – seating
10. Amenities – waste receptacles
11. Ridership characteristics and demographics

Service and service area

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

- **Frequent service** – Cherriots Local services that run every 15 minutes or better during peak times.
- **Standard service** – Cherriots Local services that run every 30 minutes throughout the day.
- **Basic service** – Cherriots Local services that run every 60 minutes throughout the day.
- **Cherriots Regional express service** – Cherriots Regional fixed-route express services that connect communities throughout the region. For the purposes of the maps in this section, the Cherriots Local commuter express service (Route 1X Salem / Wilsonville Express) is also included in this category.

Figure V- 1. Service and service area (Marion and Polk counties)



Service

- Frequent Service
- Standard Service
- Basic Service
- Regional Express
- Cherriots Service Area
- Cherriots Regional Service Area

Keizer

Salem

CHENAWA RD NE

RIVER RD N

VERDA LN NE

PORTLAND RD NE

SILVERTON RD NE

LANCASTER DR NE

MARKET ST NE

CENTER ST NE

STATE ST

MISSION ST SE

TURNER RD SE

LANCASTER DR SE

WALLACE RD NW

EDGEWATER ST NW

LIBERTY RD S

COMMERCIAL ST SE

1 0.5 0 1 Miles

N
W
S
E

Service availability

Figures V-3 and V-4 below display areas in Marion and Polk counties that are within a half mile of a bus stop, which are the places SAMTD considers served.

Figure V- 3. Areas within a half mile walk of a bus stop (Marion and Polk counties)

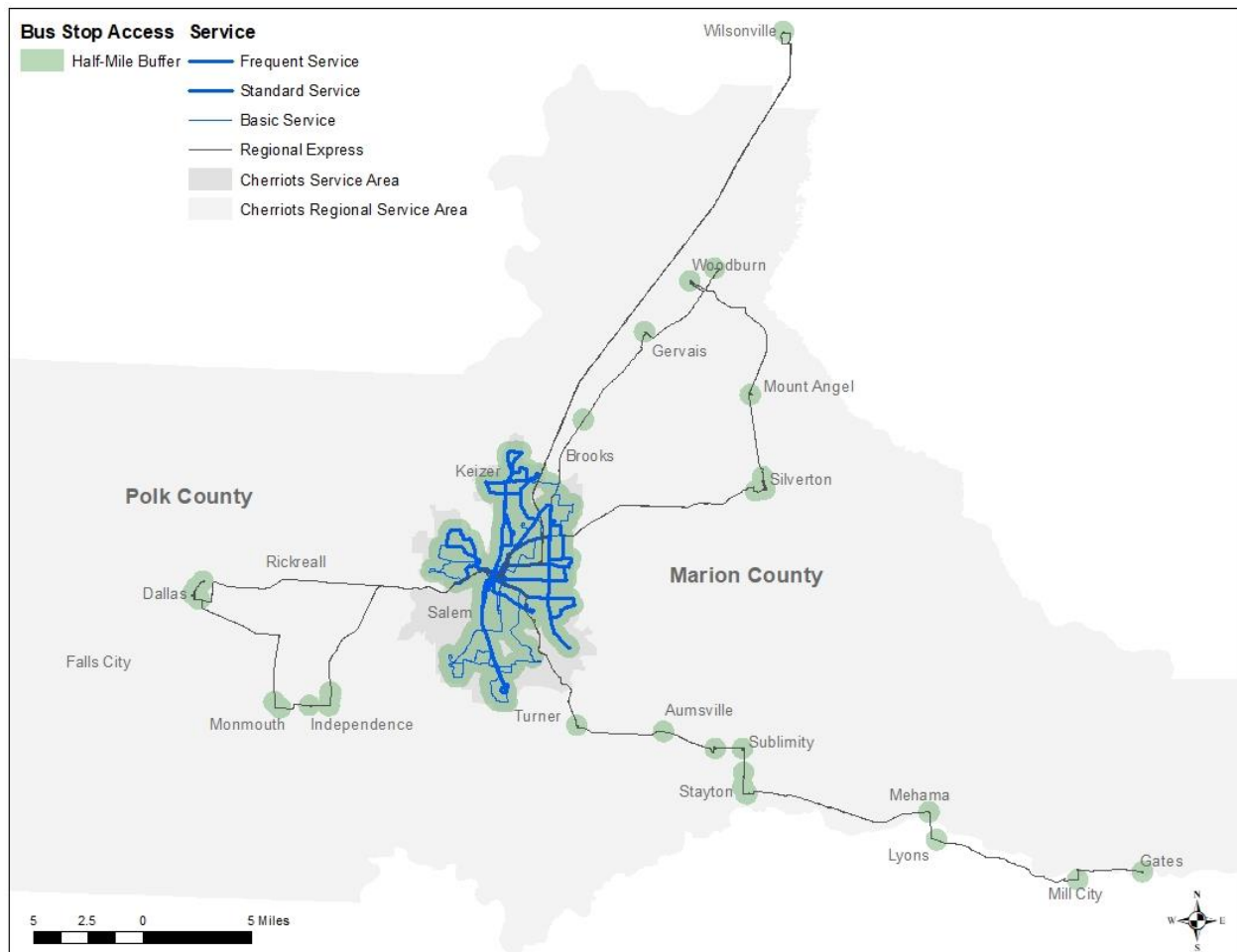
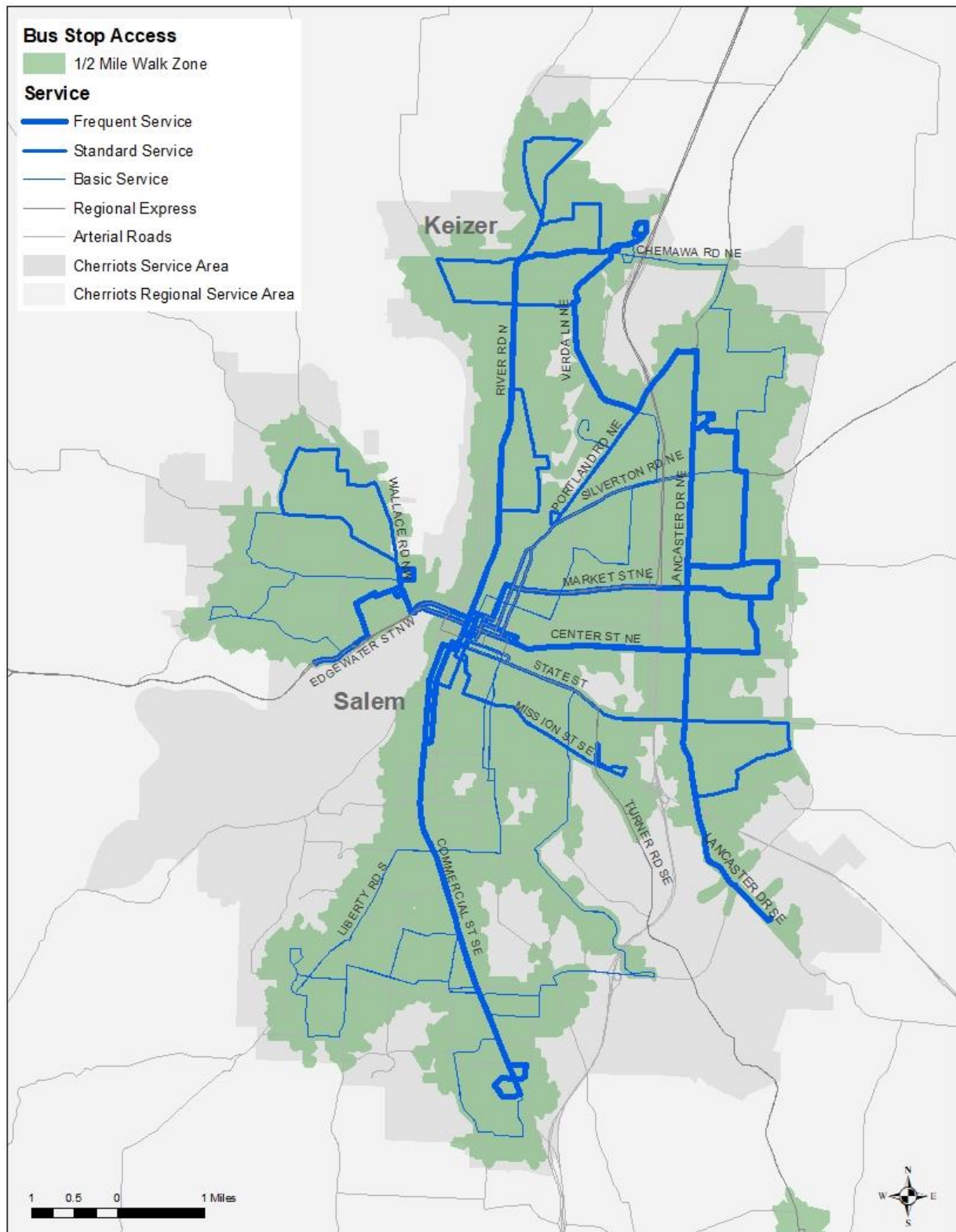


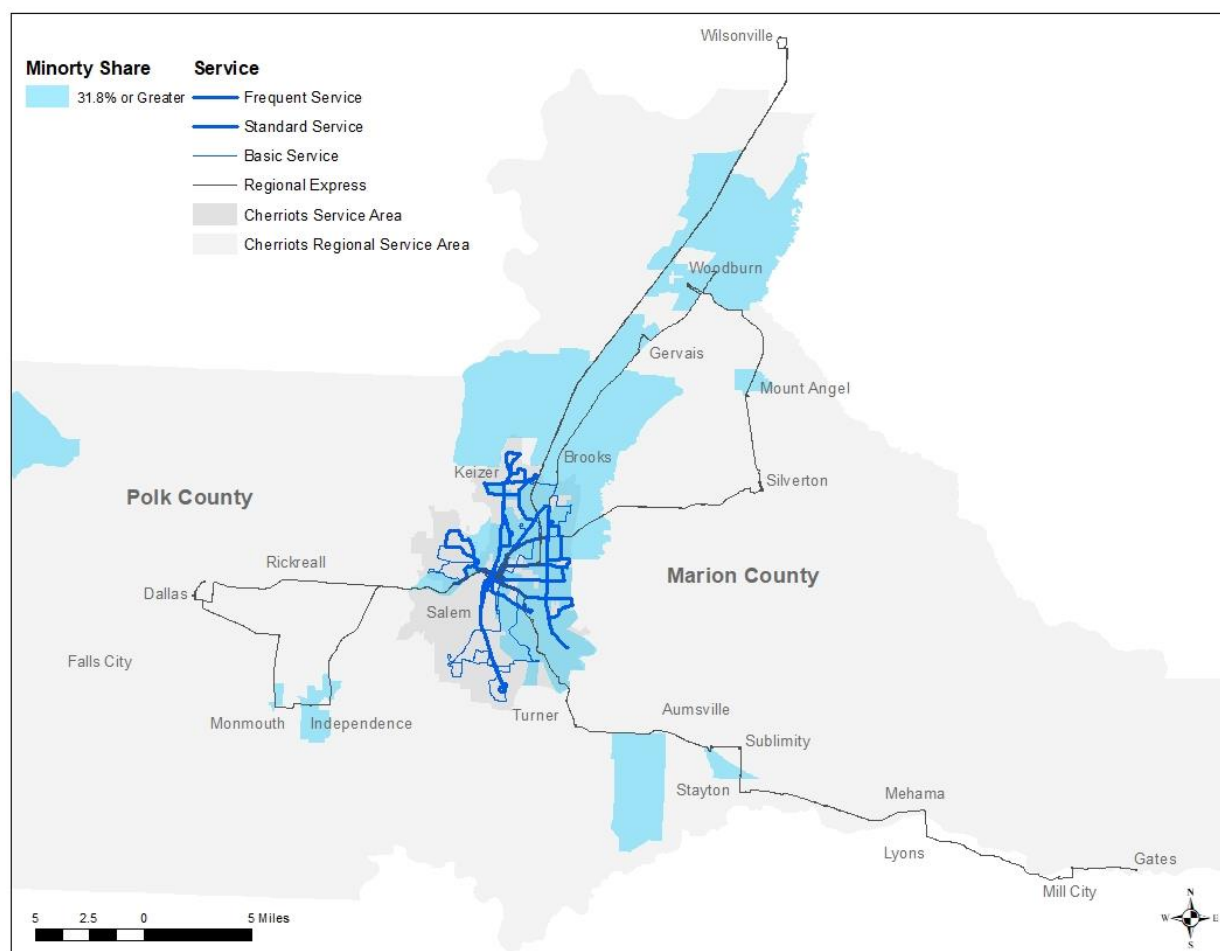
Figure V- 4. Areas within a half mile walk of a bus stop (Salem and Keizer)



Minority population

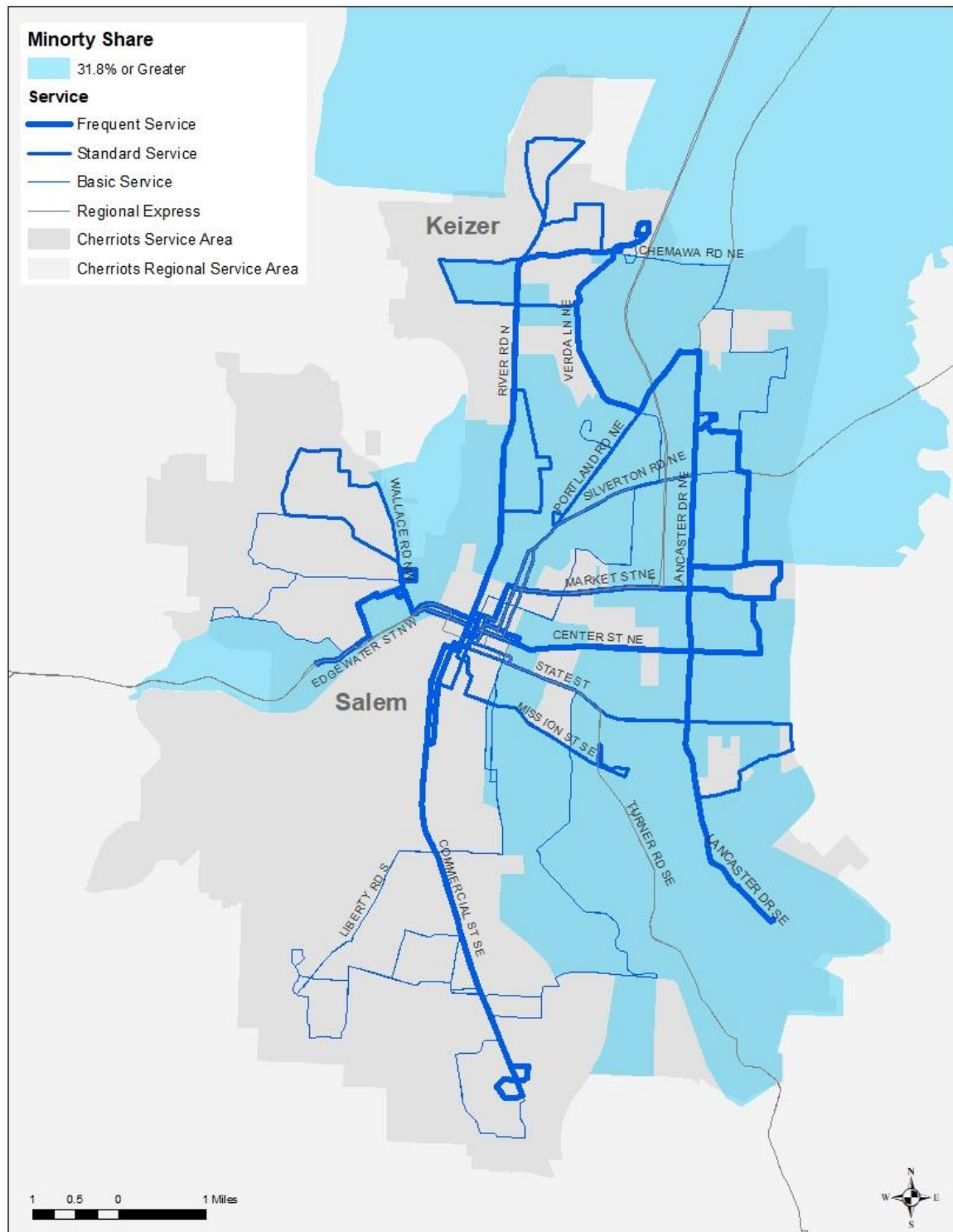
Figures V-5 and V-6 below display U.S. Census block groups in Marion and Polk counties that have shares of minority populations greater than the average for the two counties (31.8 percent) as of the 2014-2018 ACS.

Figure V- 5. Service and service area relative to block groups with greater than average minority populations (Marion and Polk counties)



Source: ACS 2014-18, Table B03002.

Figure V- 6. Service and service area in relation to block groups with greater than average minority populations (Salem and Keizer)

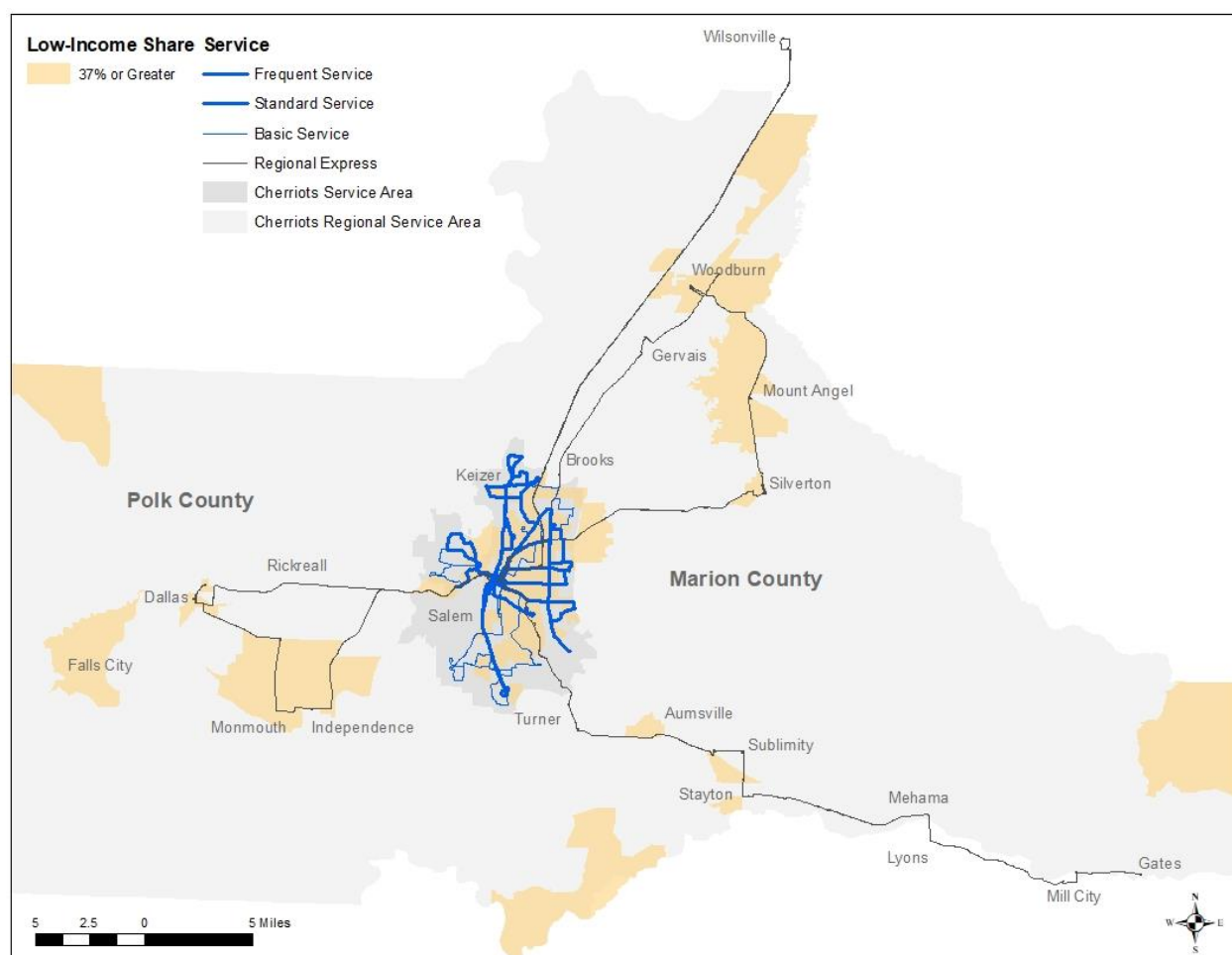


Source: ACS 2014-18, Table B03002.

Low-income population

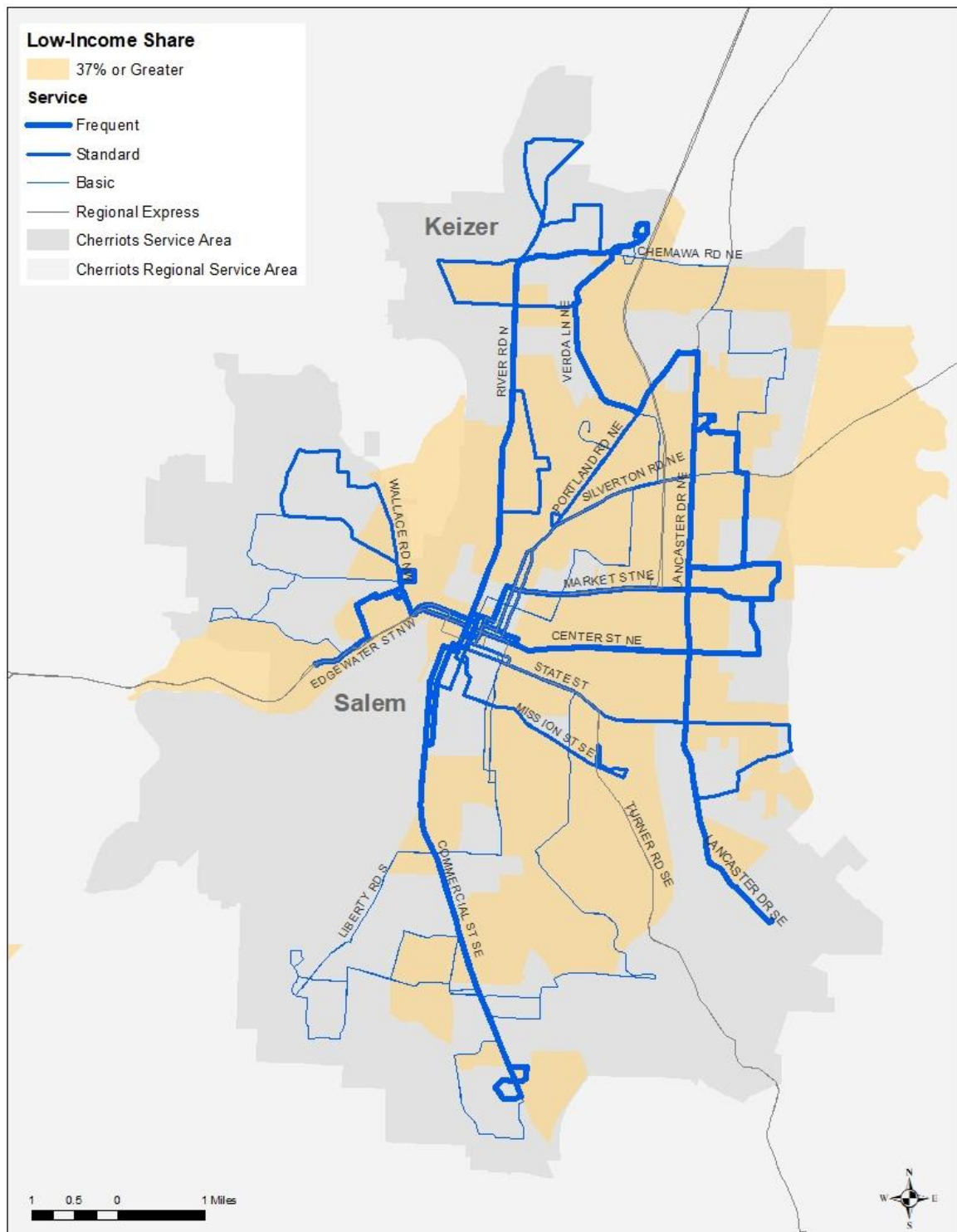
Figures V-7 and V-8 below display U.S. Census block groups in Marion and Polk counties that have shares of low-income populations greater than the average for the two counties (36.9 percent) as of the 2014-2018 ACS. Low-income is defined as households earning at or below 200 percent of the Federal Poverty Level (FPL). Block group level data was unavailable, so U.S. Census tract data was used.

Figure V- 7. Service and service area in relation to block groups with greater than average low-income (200 percent FPL) populations (Marion and Polk counties)



Source: ACS 2014-18, Table C17002.

Figure V- 8. Service and service area in relation to block groups with greater than average low-income (200 percent FPL) populations (Salem and Keizer)

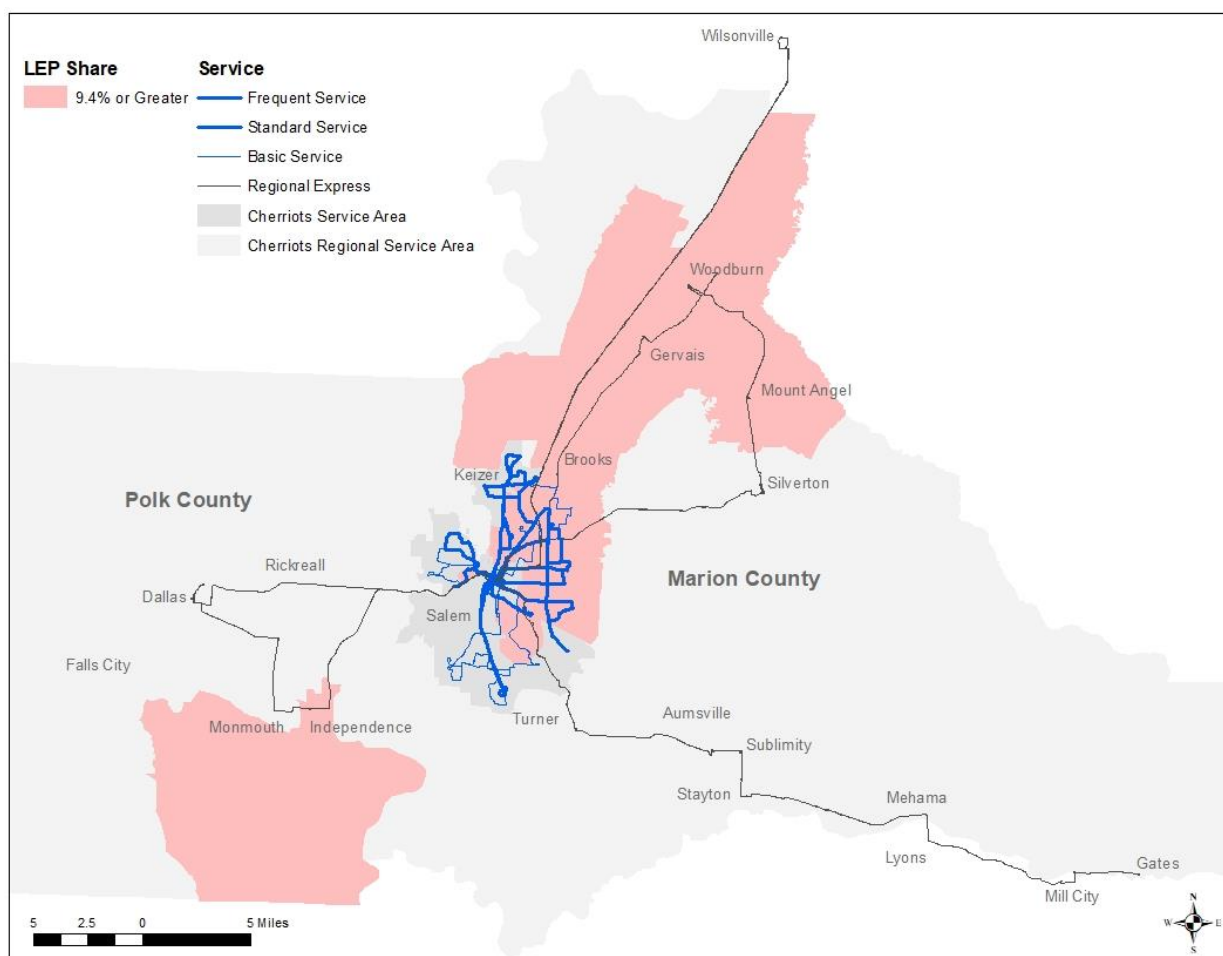


Source: ACS 2014-18, Table C17002.

Limited English Proficient (LEP) population

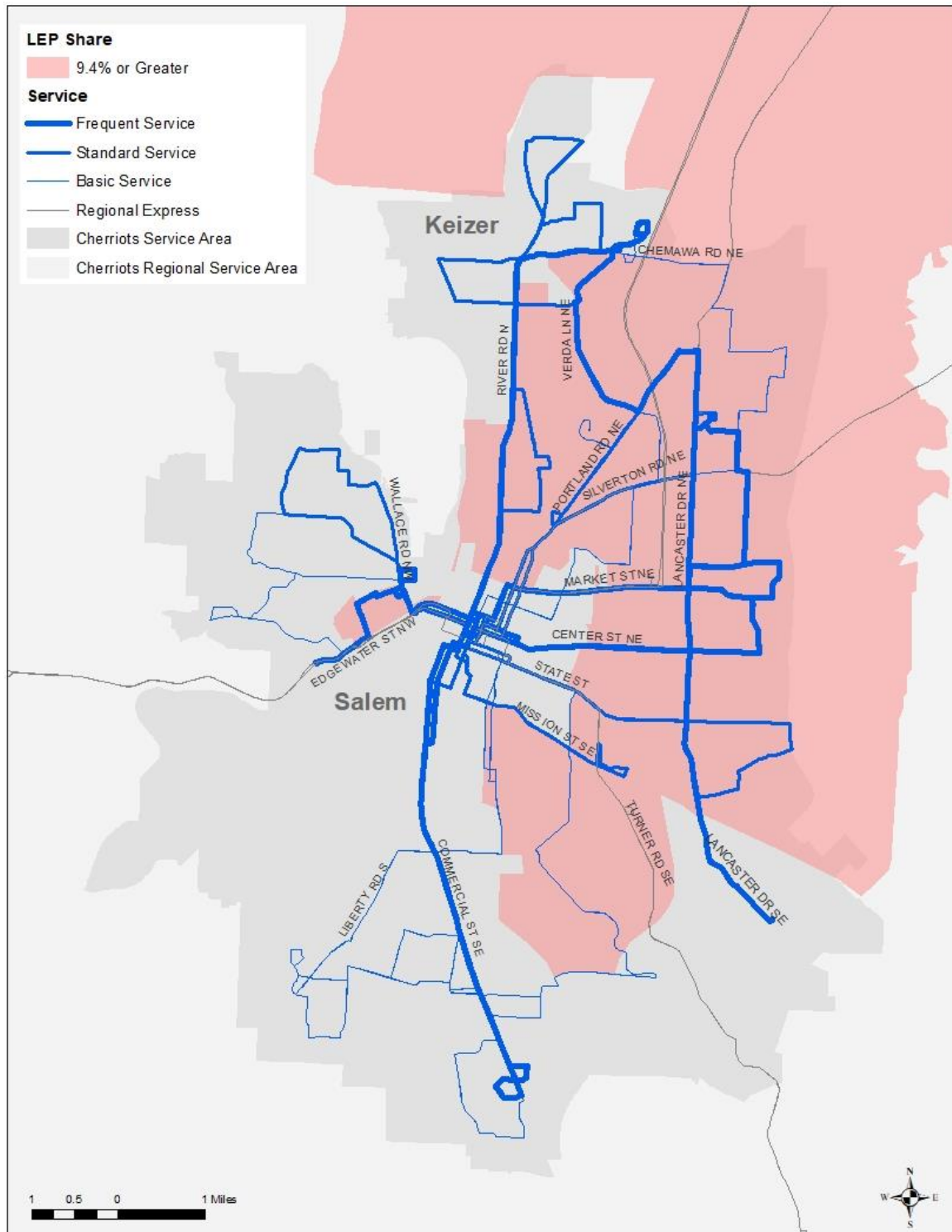
Figures V-9 and V-10 below display U.S. Census tracts in Marion and Polk counties that have shares of LEP populations greater than the average for the two counties (9.4 percent) as of the 2014-2018 ACS. Block group level detail was unavailable for LEP data, so U.S. Census tract data is shown. LEP is defined as those who speak English less than “very well”.

Figure V- 9. Service and service area in relation to Census tracts with greater than average LEP populations (Marion and Polk counties)



Source: ACS 2014-18, Table C16001.

Figure V- 10. Service and service area in relation to Census tracts with greater than average LEP populations (Salem and Keizer)

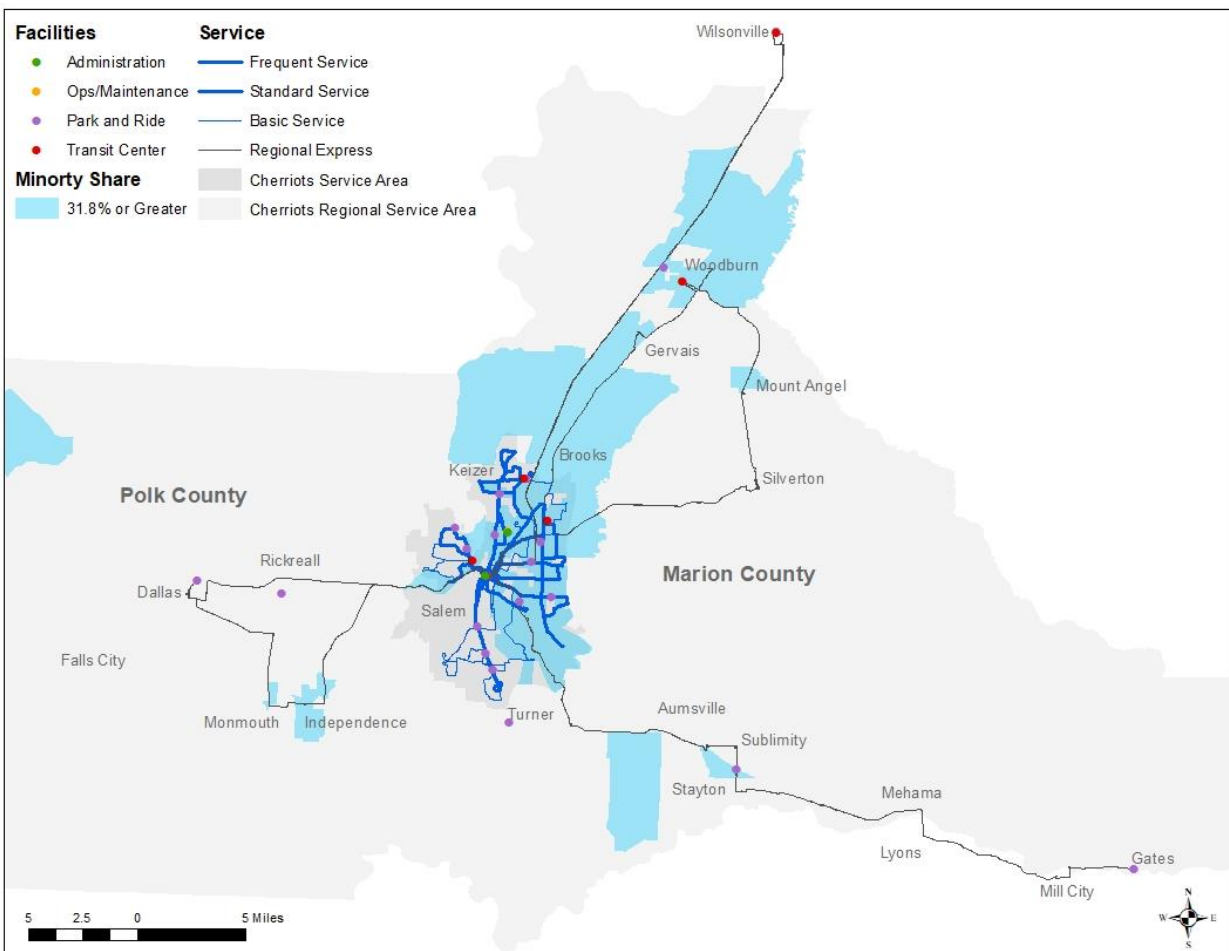


Source: ACS 2014-18, Table C16001.

Facilities

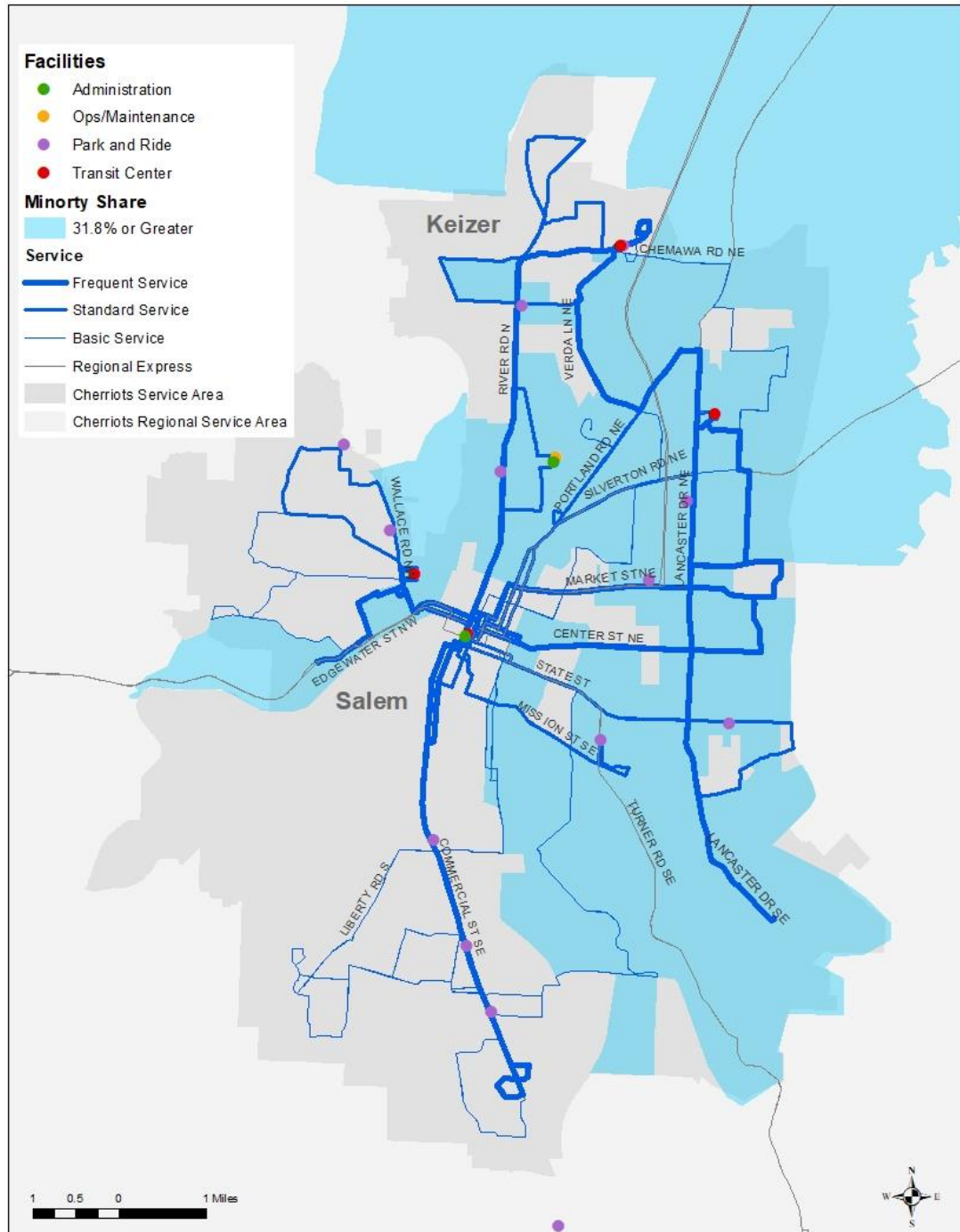
Figures V-11 through V-14 below display SAMTD facilities and facilities owned by other public or private entities but served by Cherriots buses, including administrative offices, operations and maintenance facilities, park and ride locations, and transit centers. Overlays include minority populations and low-income populations.

Figure V- 11. Current SAMTD facilities and facilities owned by other public or private entities but served by Cherriots buses in relation to U.S. Census block groups with greater than average minority populations (Marion and Polk counties)



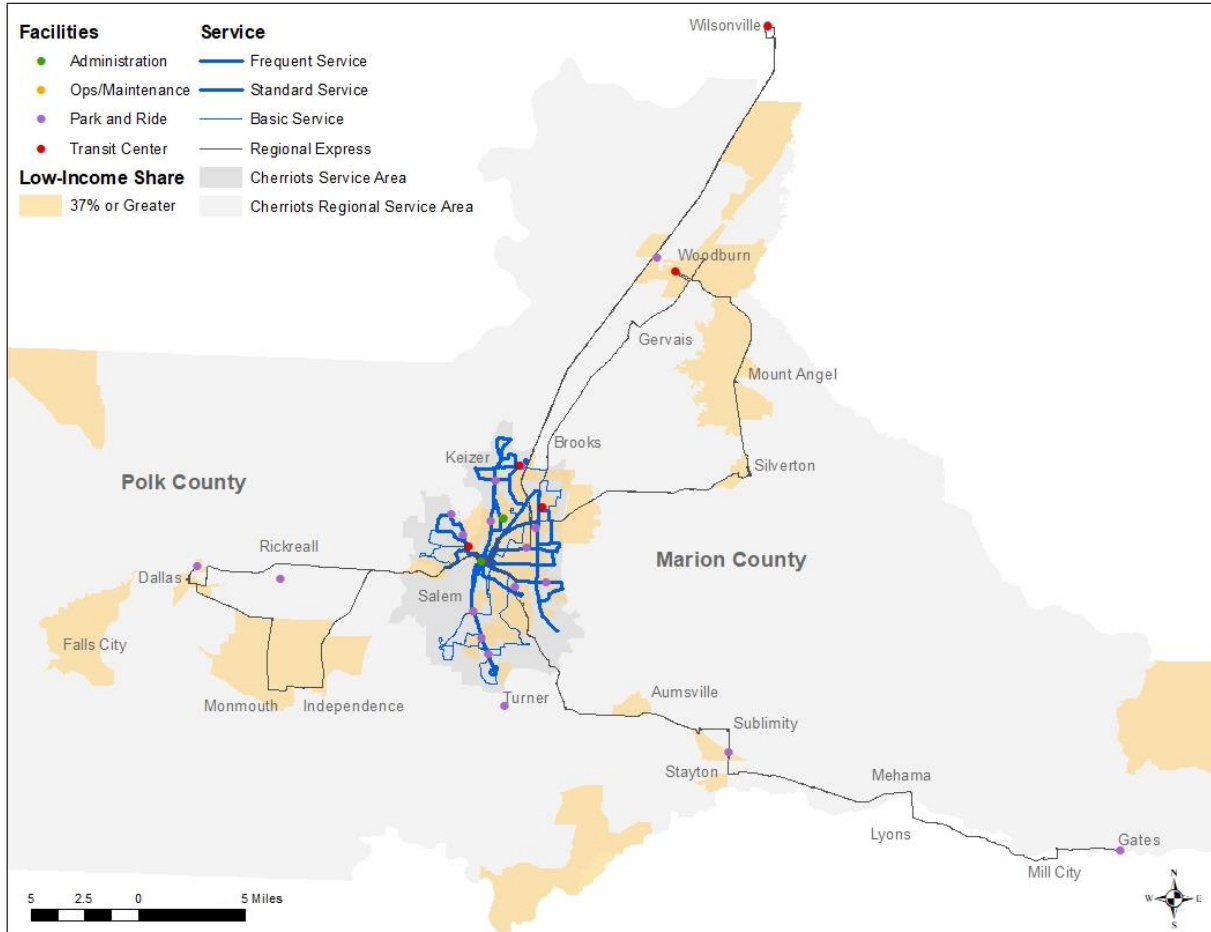
Source: ACS 2014-18, Table B03002.

Figure V- 12. Current SAMTD facilities and others that are publicly or privately owned served by Cherriots buses in relation to block groups with greater than average minority populations (Salem and Keizer)



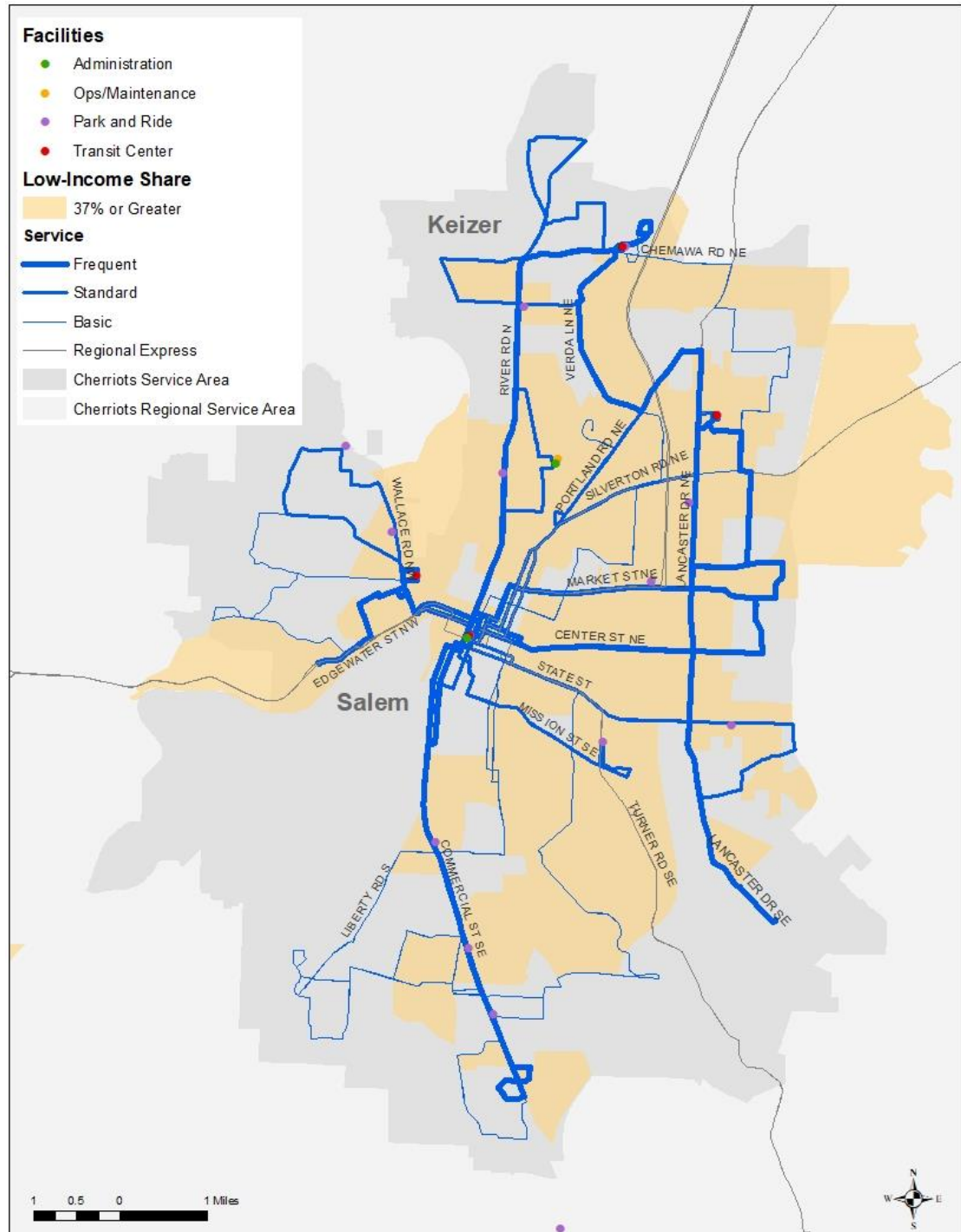
Source: ACS 2014-18, Table B03002.

Figure V- 13. Low-income (200 percent FPL) populations in relation to current SAMTD facilities and facilities belonging to other public and private entities, which are served by Cherriots buses (Marion and Polk counties)



Source: ACS 2014-18, Table C17002.

Figure V- 14. Low-income (200 percent FPL) populations in relation to current SAMTD facilities and facilities belonging to other public and private entities, which are served by Cherriots buses (Salem and Keizer)

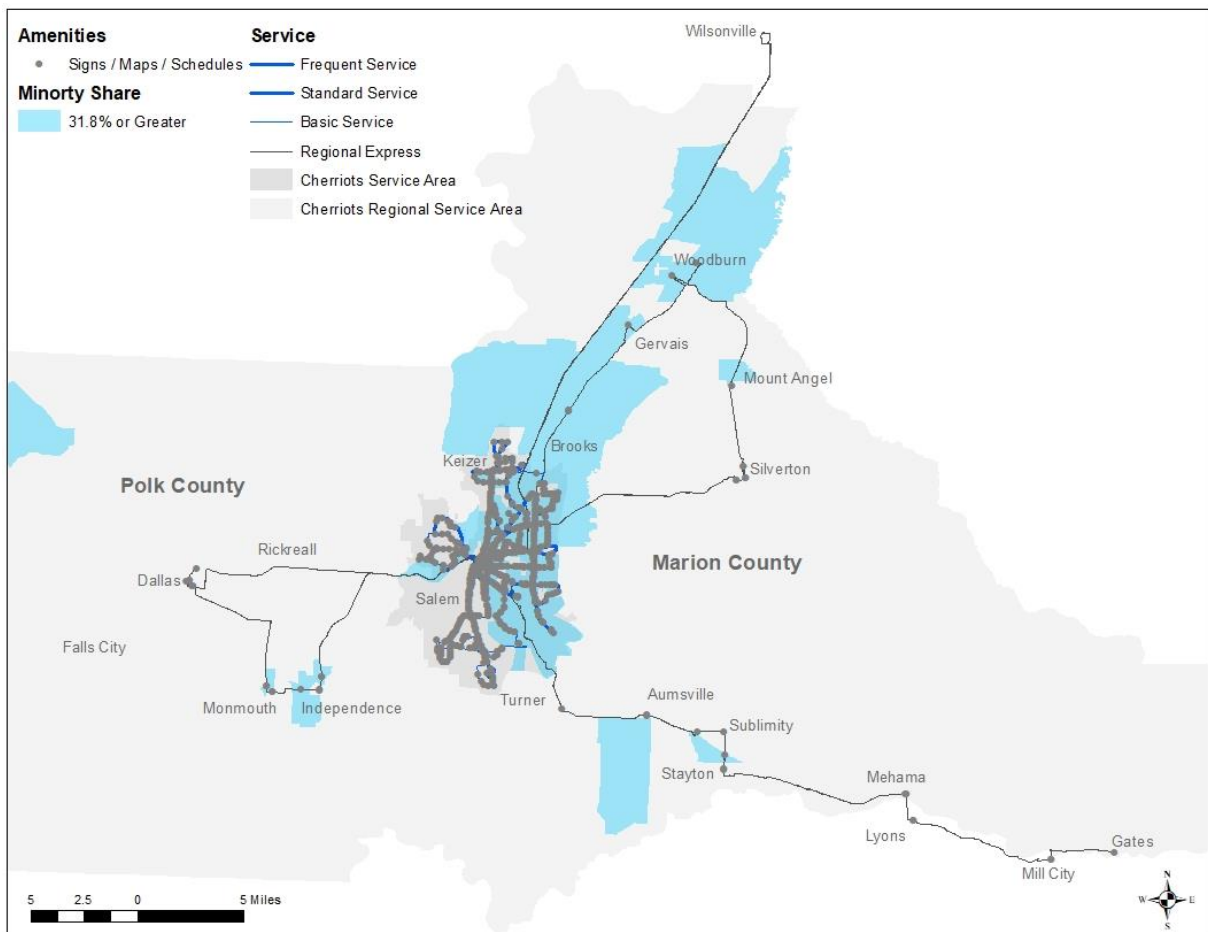


Source: ACS 2014-18, Table C17002.

Amenities – signs, maps, and schedules

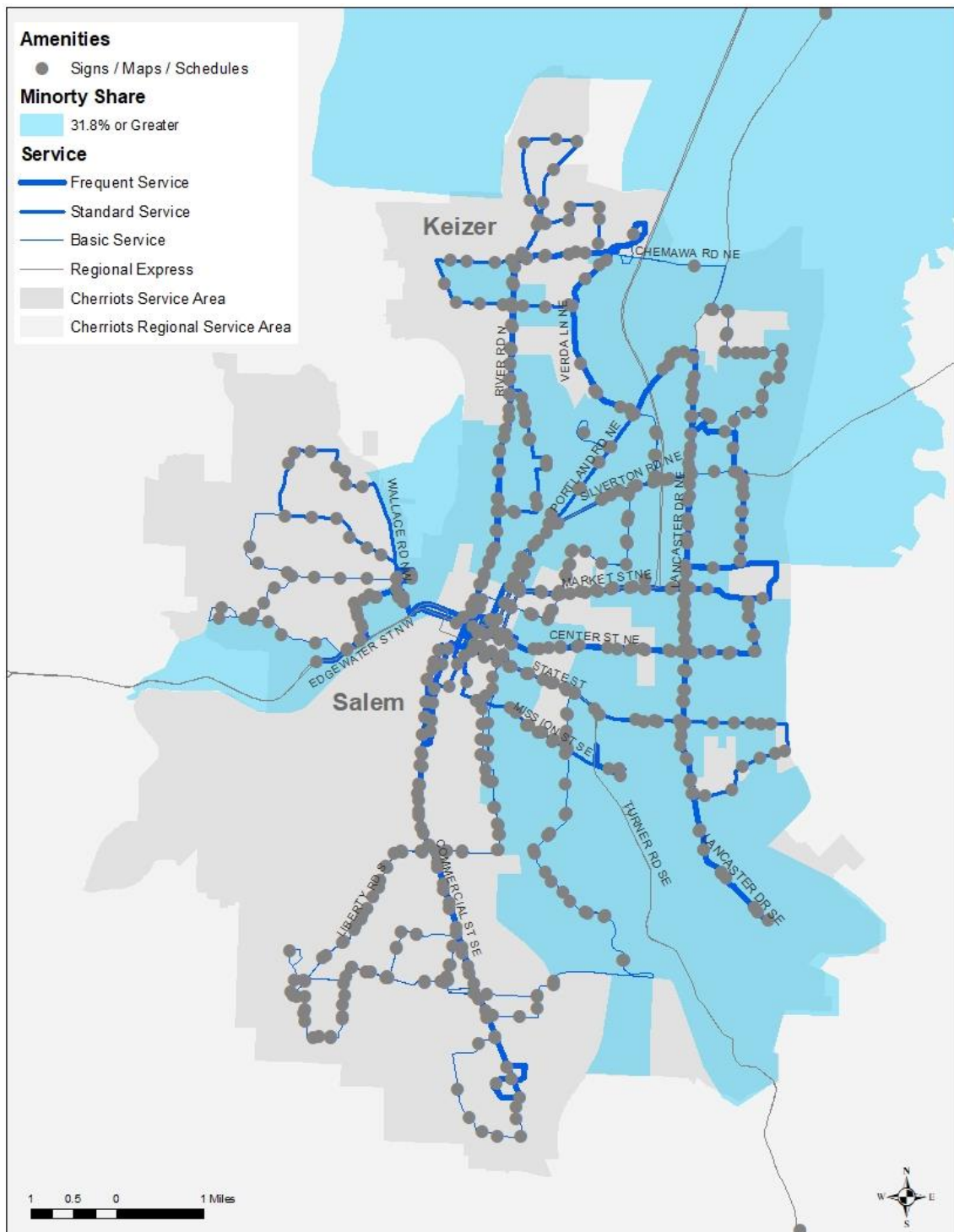
Figures V-15 through V-18 below display SAMTD signs, maps, and schedules. This includes bus stop signs, shelter schedules, and schedule racks with print schedules located throughout the region.

Figure V- 15. Signs, maps, and schedules in relation to block groups with greater than average minority populations (Marion and Polk counties)



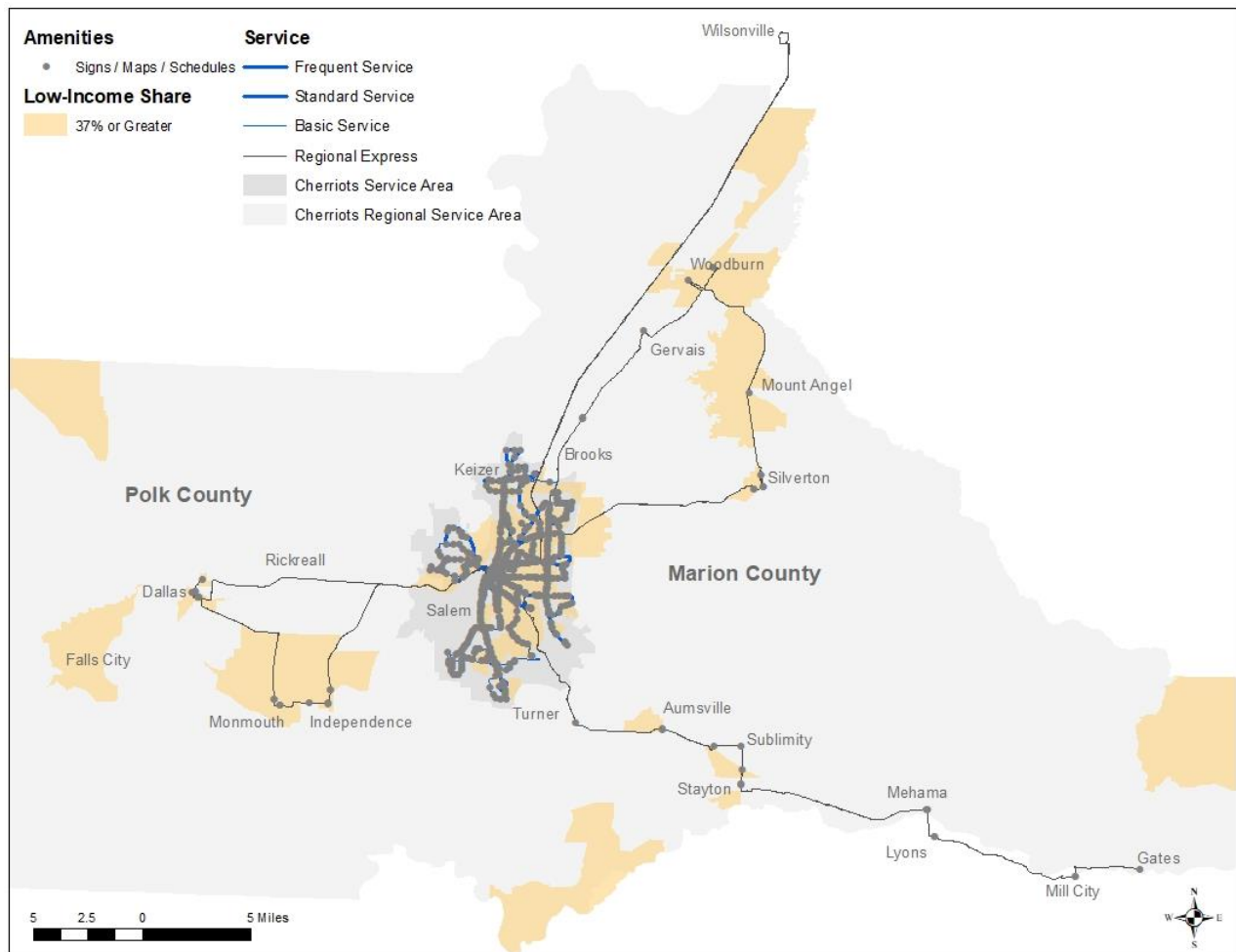
Source: ACS 2014-18, Table B03002.

Figure V- 16. Signs, maps, and schedules in relation to block groups with greater than average minority populations (Salem and Keizer)



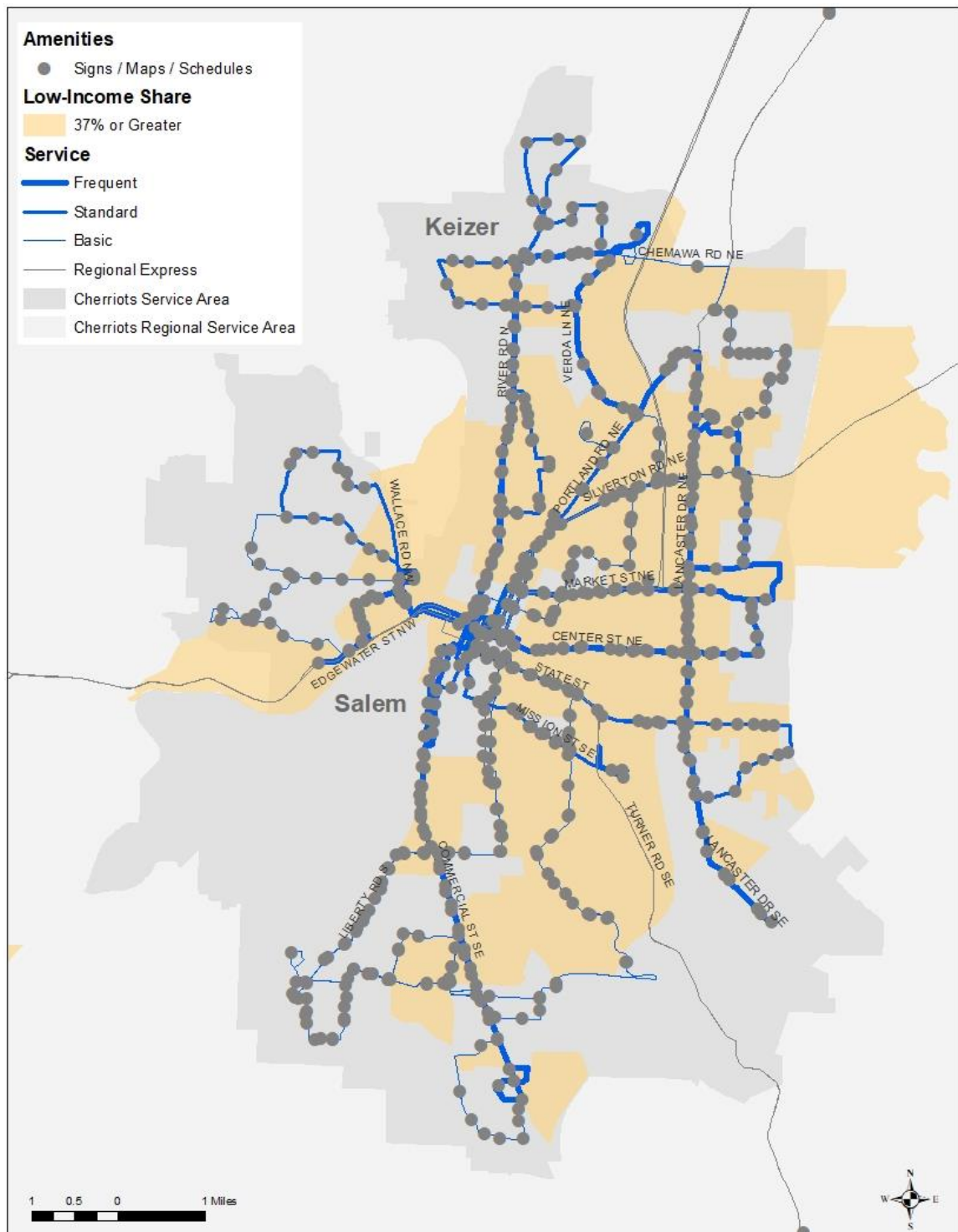
Source: ACS 2014-18, Table B03002.

Figure V- 17. Signs, maps, and schedules in relation to block groups with greater than average low-income (200 percent FPL) populations (Marion and Polk counties)



Source: ACS 2014-18, Table C17002.

Figure V- 18. Signs, maps, and schedules in relation to block groups with greater than average low-income (200 percent FPL) populations (Salem and Keizer)

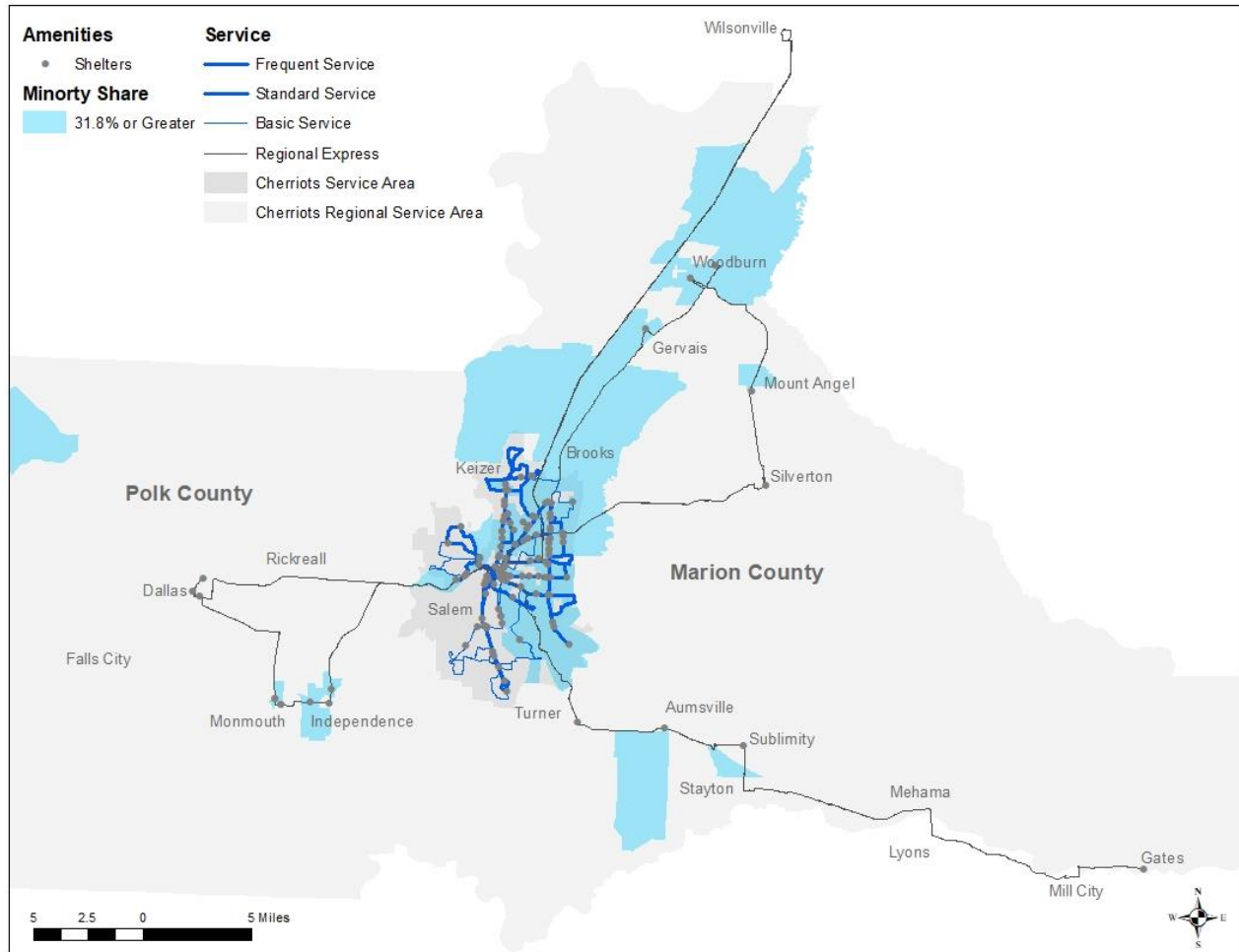


Source: ACS 2014-18, Table C17002.

Amenities – shelters

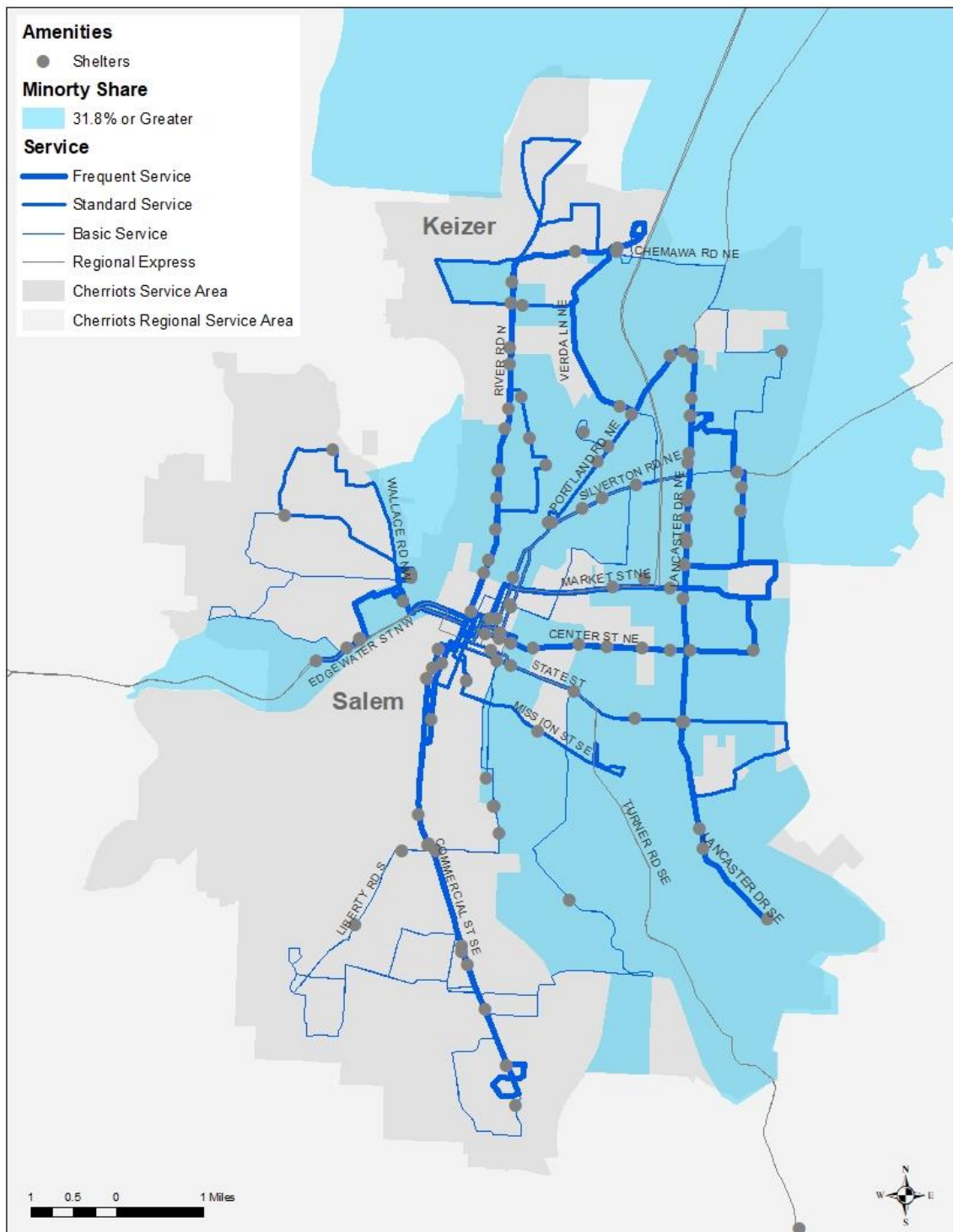
Figures V-19 through V-22 below display all SAMTD shelters and shelters belonging to other transit agencies and institutions that service SAMTD stops.

Figure V- 19. Transit shelters in relation to block groups with greater than average minority populations (Marion and Polk counties)



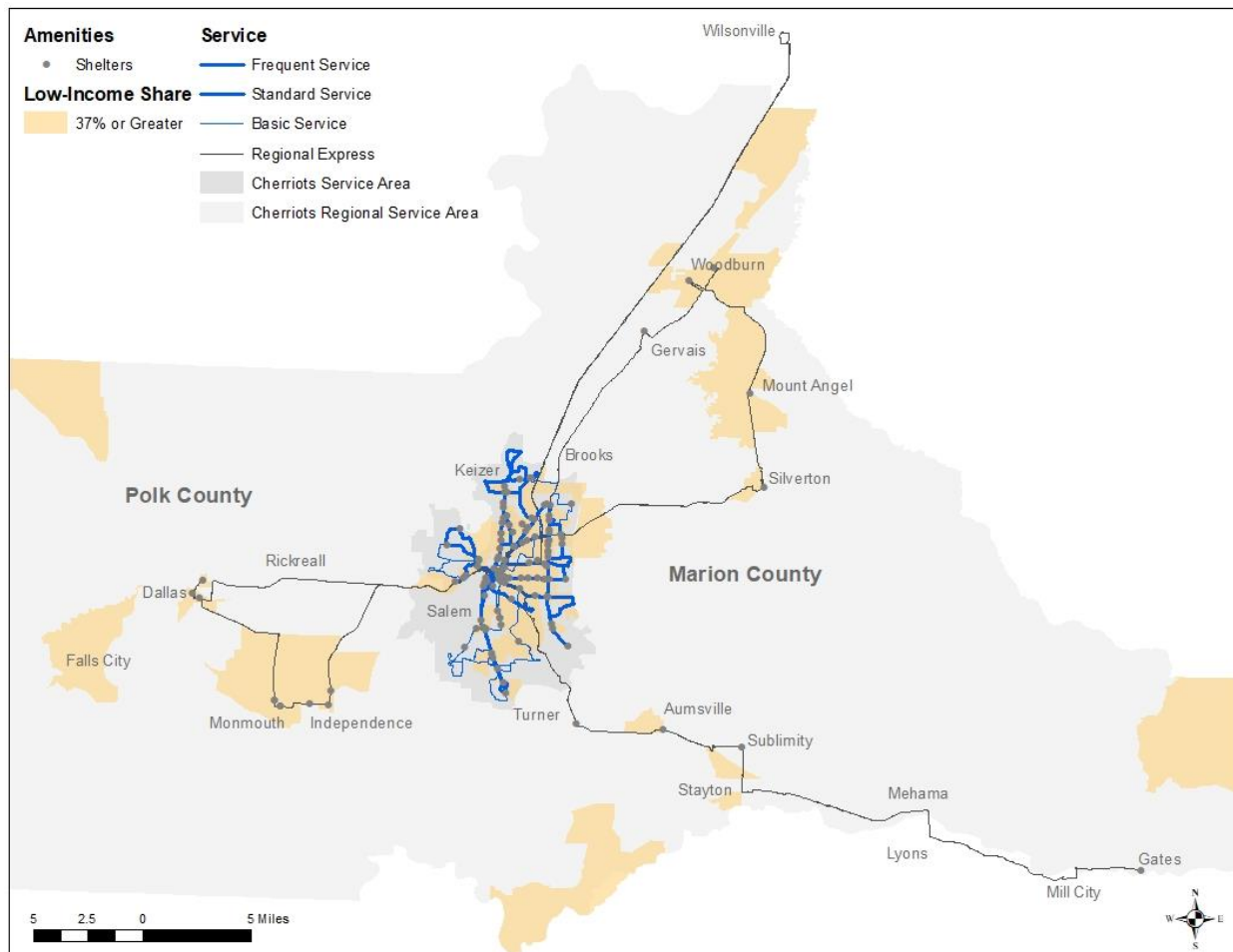
Source: ACS 2014-18, Table B03002.

Figure V- 20. Transit shelters in relation to block groups with greater than average minority populations (Salem and Keizer)



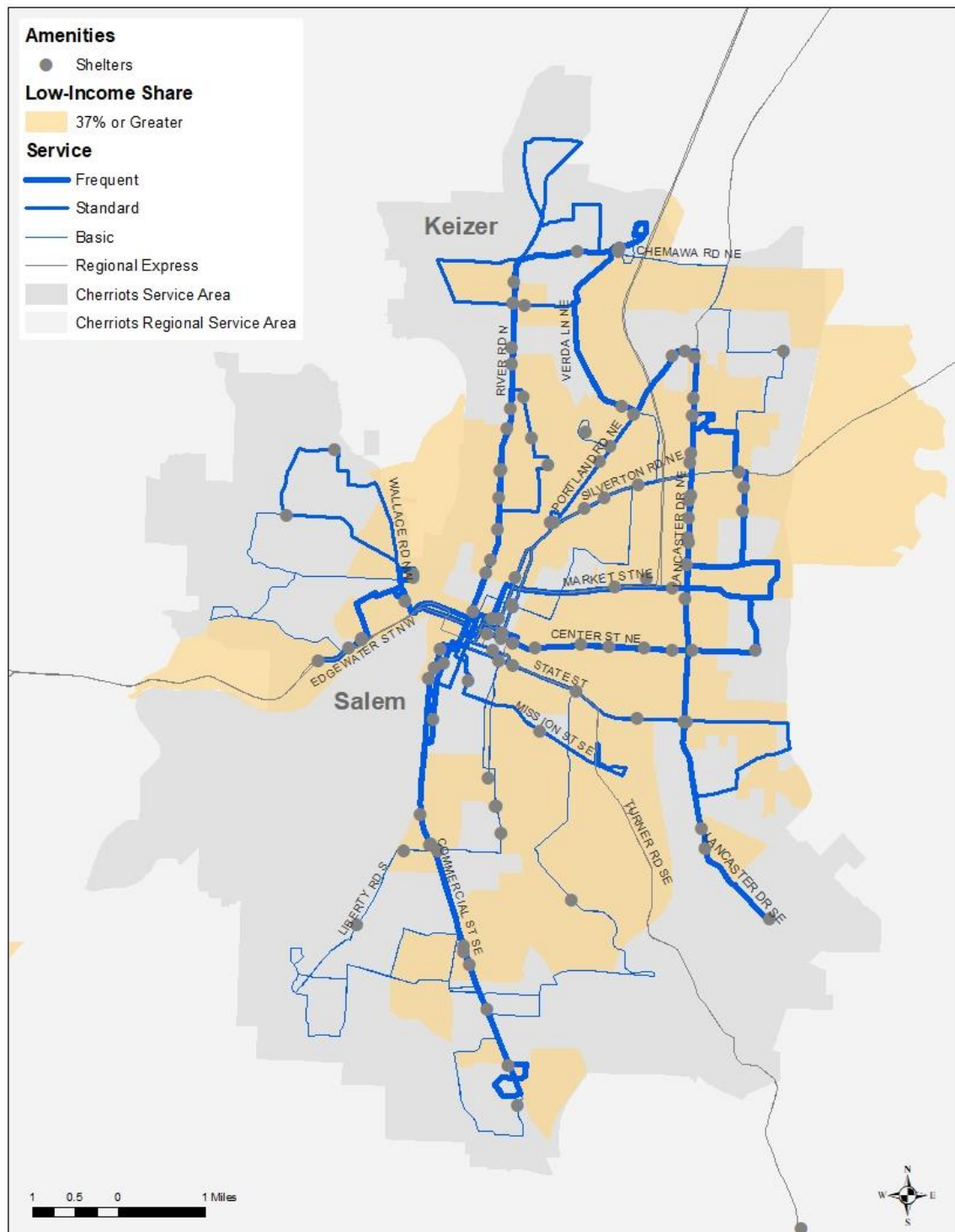
Source: ACS 2014-18, Table B03002.

Figure V- 21. Transit shelters in relation to block groups with greater than average low-income (200 percent FPL) populations (Marion and Polk counties)



Source: ACS 2014-18, Table C17002.

Figure V- 22. Transit shelters in relation to block groups with greater than average low-income (200 percent FPL) populations (Salem and Keizer)

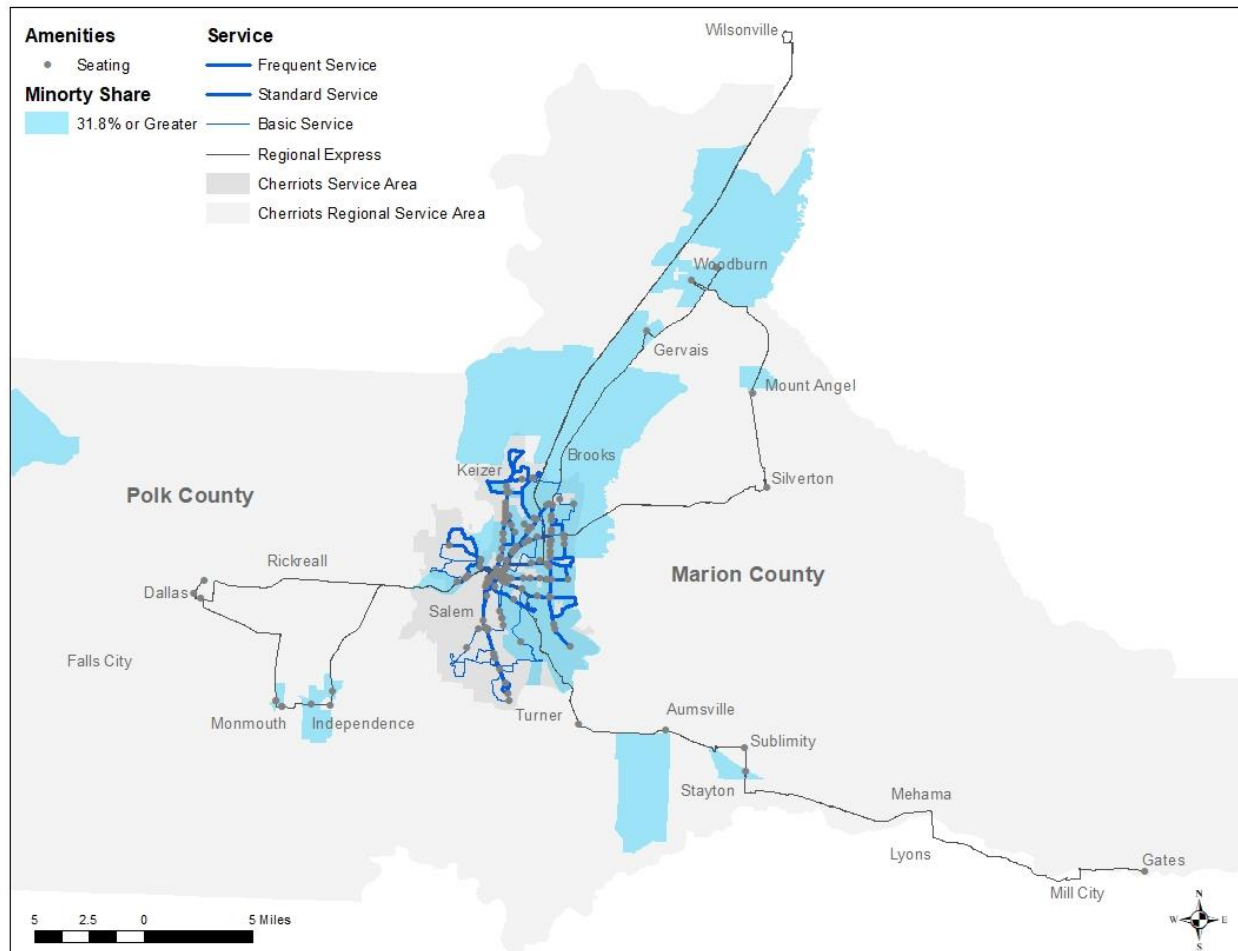


Source: ACS 2014-18, Table C17002.

Amenities – seating

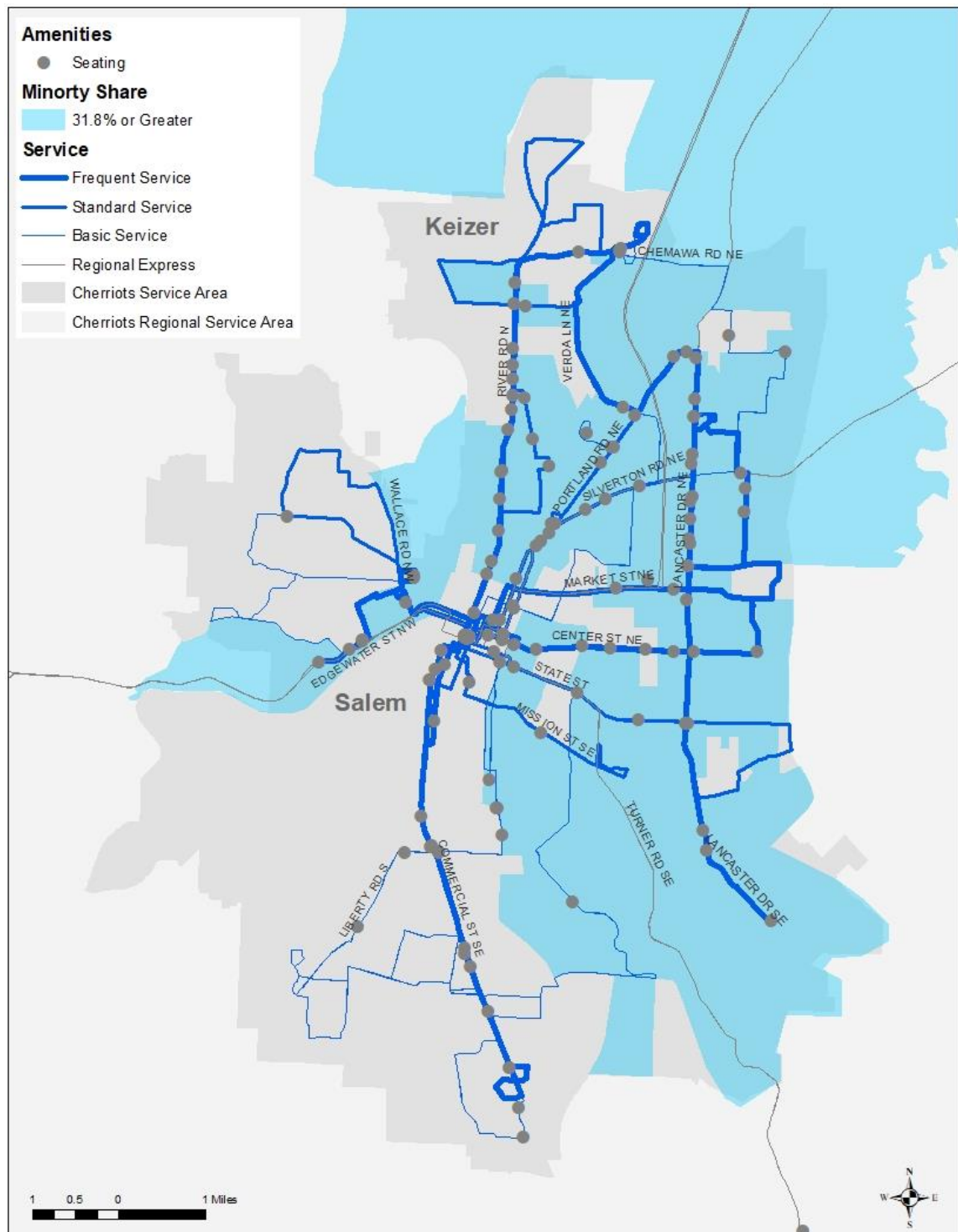
Figures V-23 through V-26 below display all SAMTD seating, including benches in shelters, stand-alone benches, and simme-seats.

Figure V- 23. Seating in relation to block groups with greater than average minority populations (Marion and Polk counties)



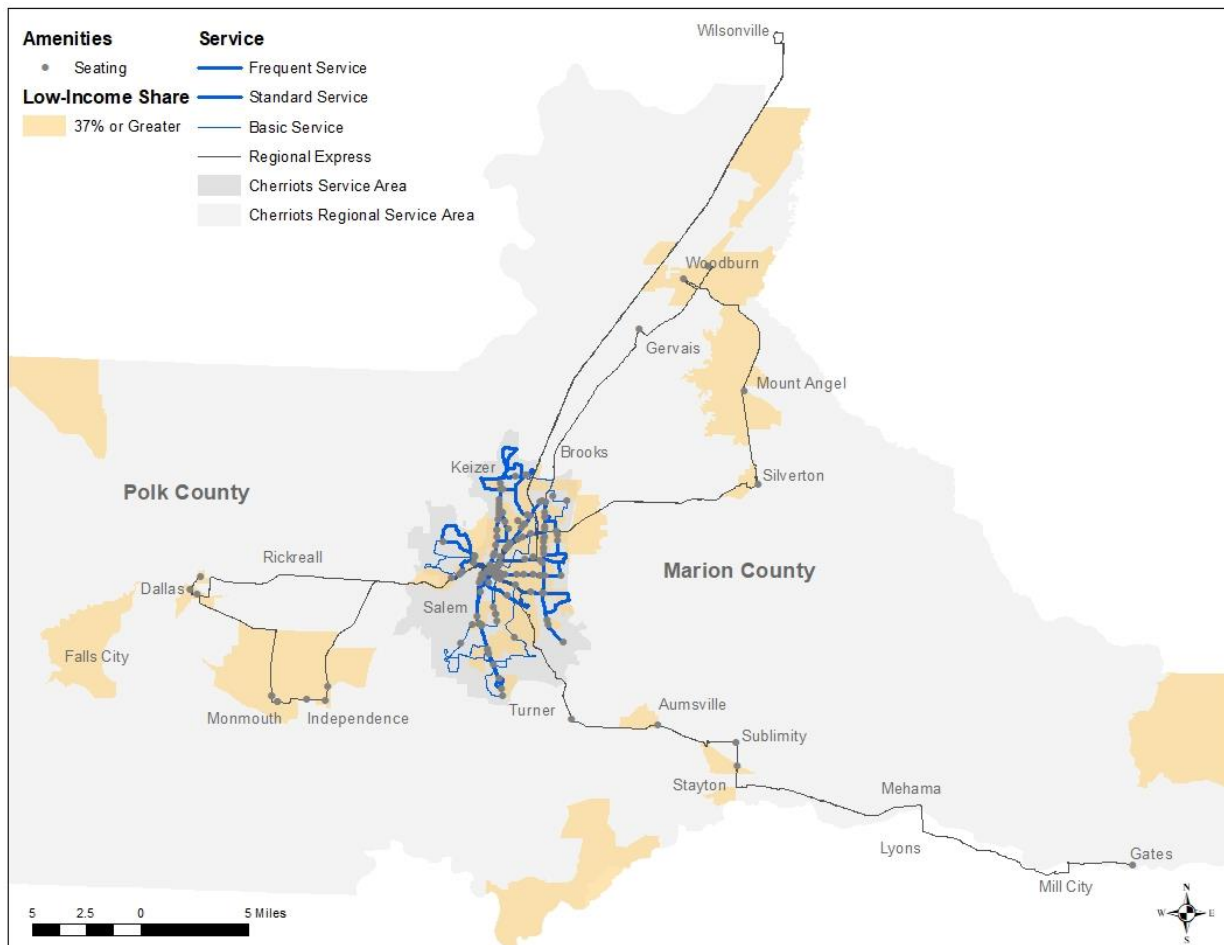
Source: ACS 2014-18, Table B03002.

Figure V- 24. Seating in relation to block groups with greater than average minority populations (Salem and Keizer)



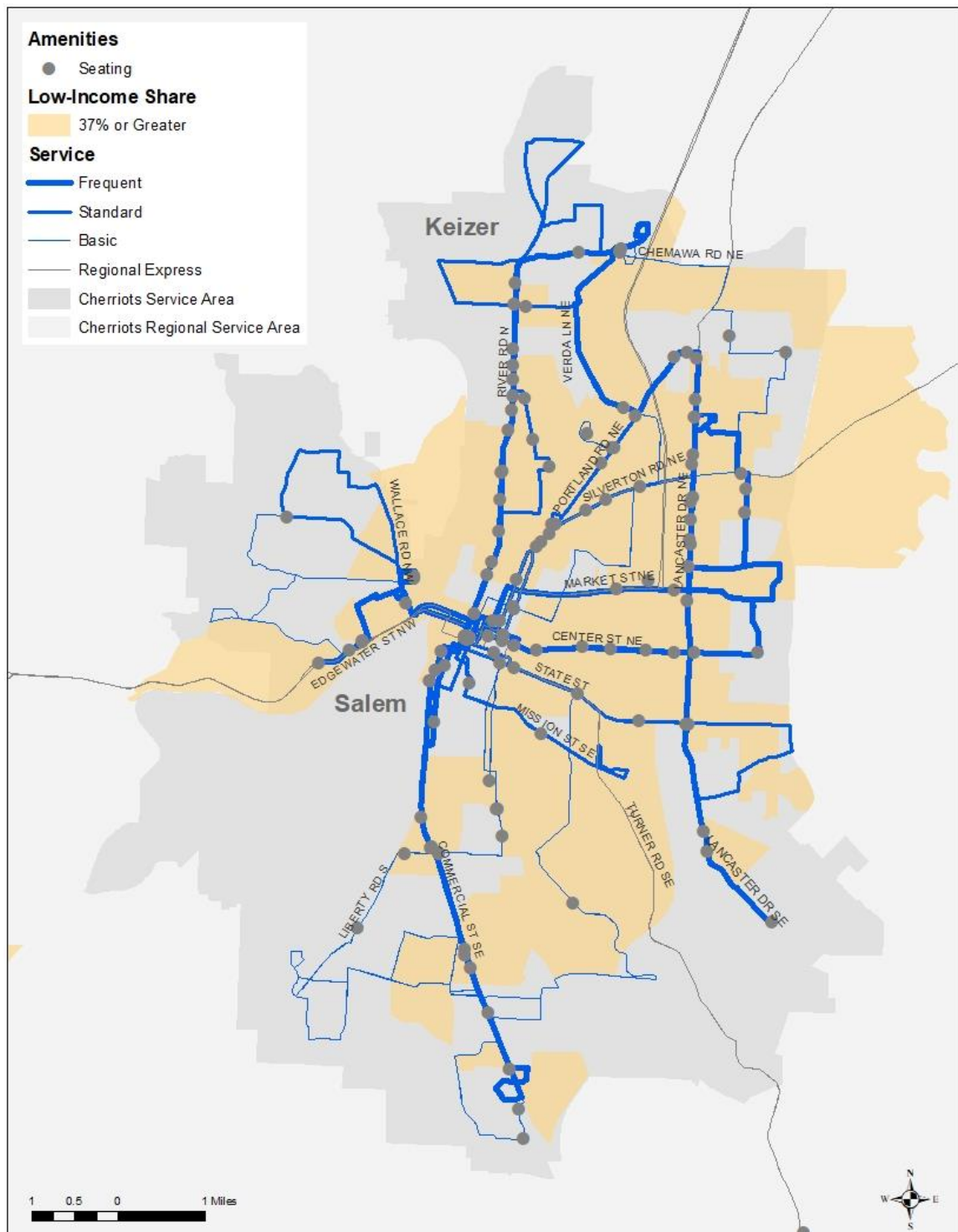
Source: ACS 2014-18, Table B03002.

Figure V- 25. Seating in relation to block groups with greater than average low-income (200 percent FPL) populations (Marion and Polk counties)



Source: ACS 2014-18, Table C17002.

Figure V- 26. Seating in relation to block groups with greater than average low-income (200 percent FPL) populations (Salem and Keizer)

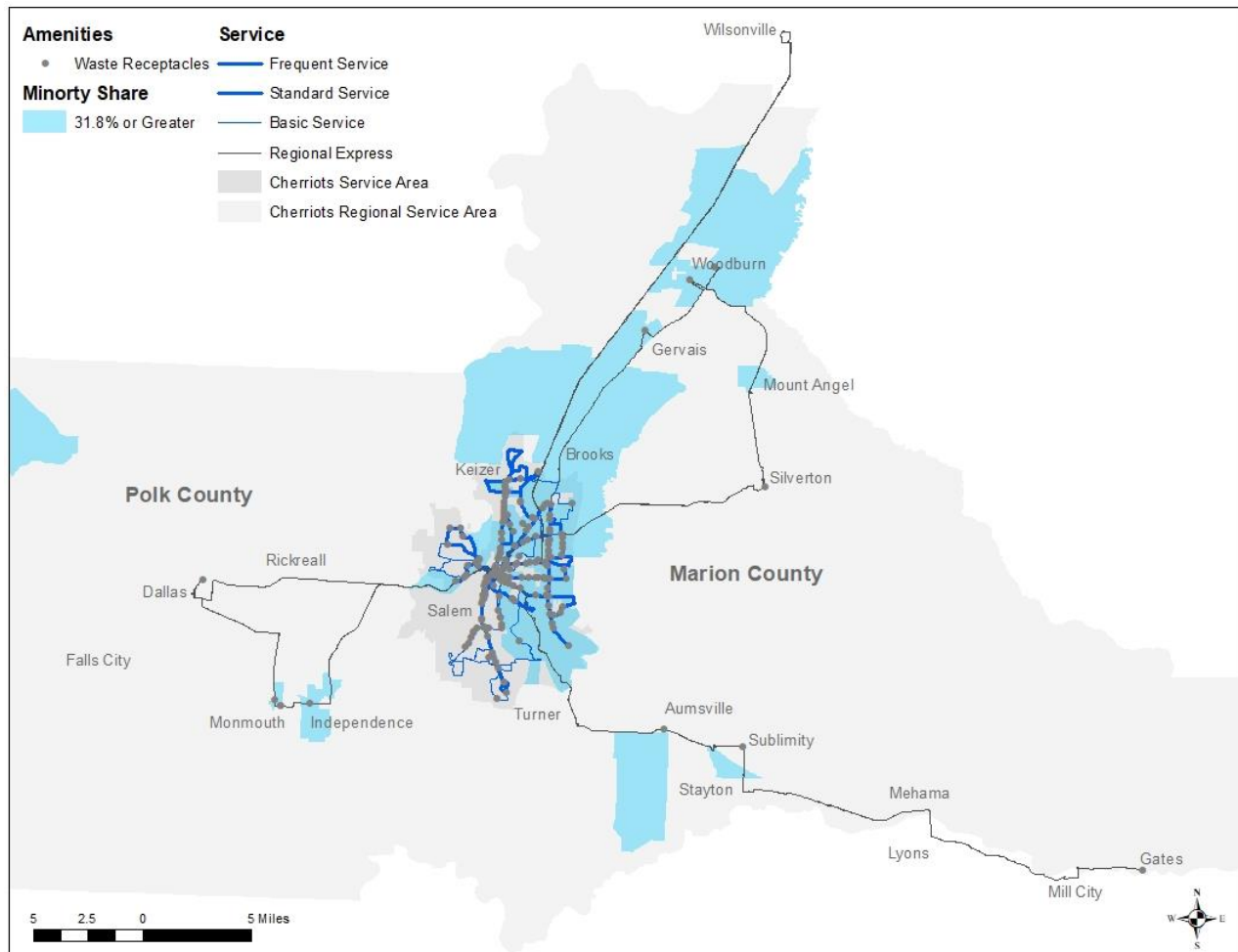


Source: ACS 2014-18, Table C17002.

Amenities – waste receptacles

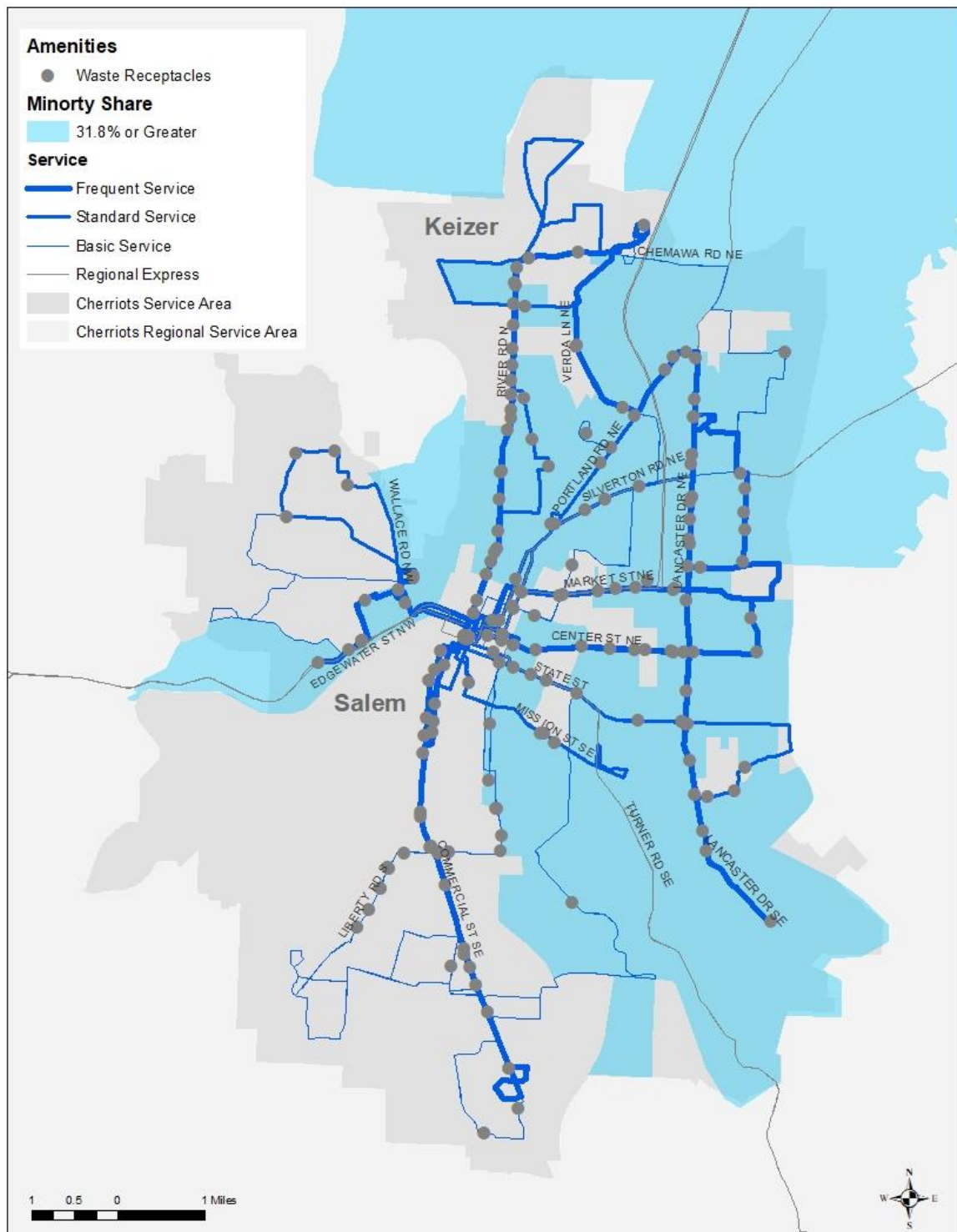
Figures V-27 through V-30 below display all SAMTD waste receptacles, including those in shelters, attached to bus stop poles, and stand-alone waste receptacles.

Figure V- 27. Waste receptacles in relation to block groups with greater than average minority populations (Marion and Polk counties)



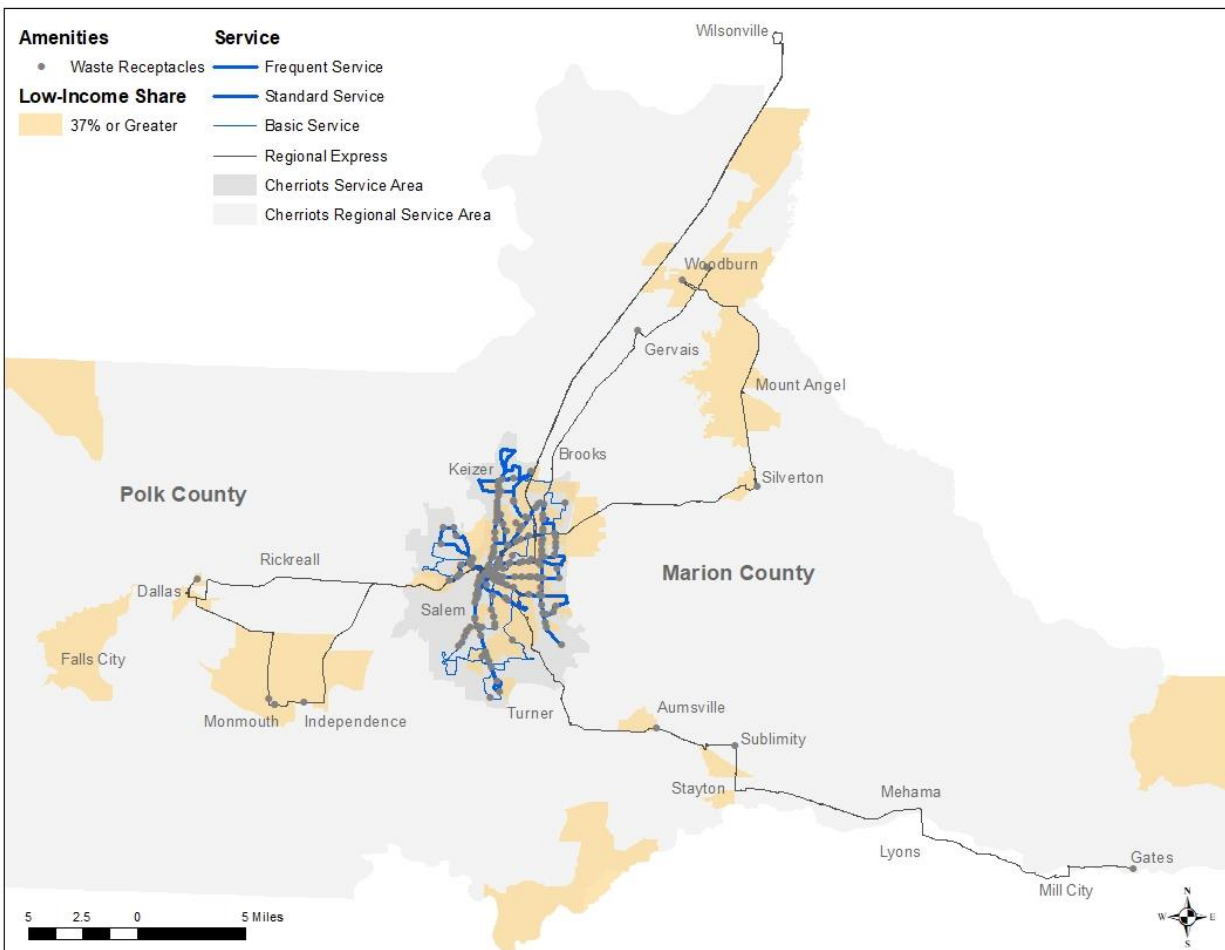
Source: ACS 2014-18, Table B03002.

Figure V- 28. Waste receptacles in relation to block groups with greater than average minority populations (Salem and Keizer)



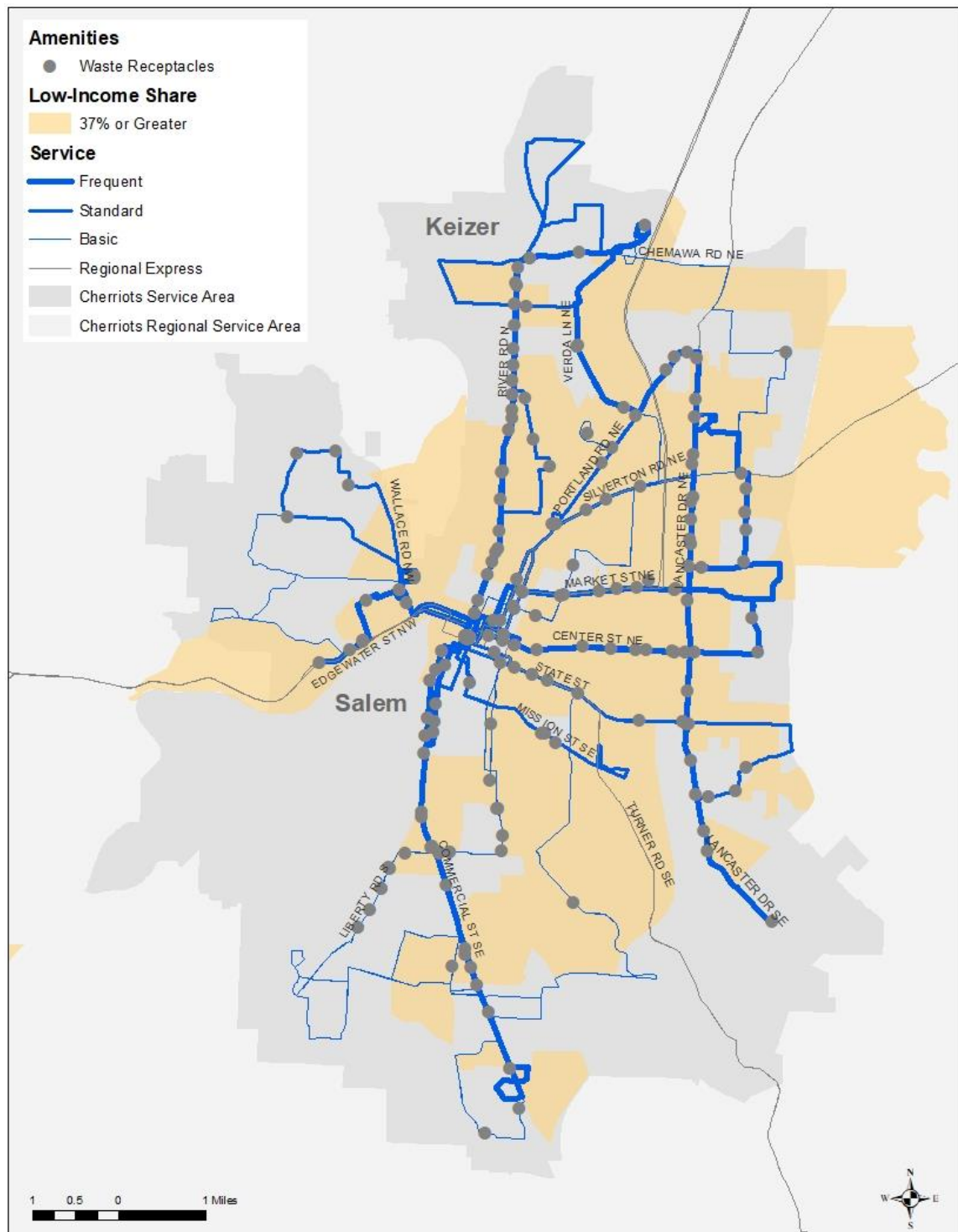
Source: ACS 2014-18, Table B03002.

Figure V- 29. Waste receptacles in relation to block groups with greater than average low-income (200 percent FPL) populations (Marion and Polk counties)



Source: ACS 2014-18, Table C17002.

Figure V- 30. Waste receptacles in relation to block groups with greater than average low-income (200 percent FPL) populations (Salem and Keizer)



Source: ACS 2014-18, Table C17002.

List of Attachments

- A:** Board Resolution No. 2020-01, adopting the 2020 Title VI update at the May 28, 2020 Board Meeting
- B:** SAMTD Title VI Notice to the Public in English, Spanish, and Russian
- C:** SAMTD Title VI complaint procedure
- D:** SAMTD Title VI complaint form
- E:** Public Participation Plan and Chapter 6 of Cherriots Service Guidelines
- F:** 2017 Needs Assessment Report
- G:** SAMTD Language Assistance Plan
- H:** Policy #710 - Subrecipient monitoring
- I:** Subrecipients' Title VI documentation
- J:** Service equity analysis for A Better Cherriots: Phase I
- K:** Fare equity analysis for June 2019 fare change
- L:** SAMTD Title VI policy documents
- M:** 2016 On-Board Survey Report