

2023 Title VI Program

***Adopted by:
Spokane Transit Authority Board of Directors***

Final

3/16/2023



Spokane Transit assures nondiscrimination in accordance with Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act. For more information, see www.spokanetransit.com. Upon request, alternative formats of this information will be produced for people who are disabled. Please call (509) 325-6094 (TTY Relay 711) or email ombudsman@spokanetransit.com.

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Section 1 | Introduction

Program Overview

According to Section 601 of Title VI of the Civil Rights Act of 1964:

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

The Civil Rights Restoration Act of 1987 clarified the broad, institution-wide application of Title VI. Title VI covers all the operations of covered entities without regard to whether specific portions of the covered program or activity are federally funded. The term “program or activity” means all operations of a department, agency, special purpose district, government, or the entity of such State or local government that distributes such assistance and each department or agency to which assistance is extended, in the case of assistance to a State or local government. (FTA C 4702.1B, Chap. II-I) The Federal Transit Administration (FTA), from which Spokane Transit Authority (STA) receives Federal funds, is required to fulfill the US Department of Transportation’s (USDOT) Title VI regulations (49 CFR part 21).

To ensure compliance with the requirements of Title VI, STA is required to adopt a Title VI Program. The contents of this document follow the requirements and guidelines of FTA’s Title VI Circular (FTA C 4702.1B), which is also meant to fulfill USDOT regulations.

Section 2 | Title VI Notice, Complaint Policy, and Procedures

Title VI Notice to the Public

STA posts the agency's Title VI Notice on the STA website, on transit vehicles, in public areas including the Spokane Transit Plaza, and at the reception area of STA's main facility. The Title VI Notice describes one's rights under Title VI. It contains information on how to seek information in another language and is translated into the three most prevalent Limited English Proficiency (LEP) languages (Spanish, Russian, and Vietnamese). The contents of the notice, also written in the safe harbor languages, are as follows:

Non-Discrimination Notice

Title VI of the Civil Rights Act of 1964 states that, "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program receiving Federal financial assistance."

Spokane Transit Authority (STA) does not discriminate in the provision of service on the basis of race, color, or national origin. Any person who believes STA has discriminated against him or her on the basis of race, color, or national origin may file a complaint using form linked below.

If information is needed in another language, contact (509) 325-6094.

Si necesita información en otro idioma, comuníquese al (509) 325-6094.

Для получения информации на другом языке звоните по тел. (509) 325-6094.

Nếu quý vị cần thông tin bằng một ngôn ngữ khác, xin vui lòng gọi số (509) 325-6094.

Title VI Complaint Procedures

Title VI of the Civil Rights Act of 1964 states that, "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program receiving Federal financial assistance."

STA does not discriminate in the provision of service on the basis of race, color, or national origin. Any person who believes STA has discriminated against him or her on the basis of race, color, or national origin may file a complaint using form linked below. STA does not investigate complaints received more than 180 days after the alleged incident and will only process complaints that are complete.

Within 15 business days of receiving the completed complaint form, STA will acknowledge receipt of the complaint in writing (either letter or email). An STA investigator may request that the complainant provide additional information. The complainant has 15 business days from the date of STA's response to send the requested information to the investigator. If the investigator does not receive the additional information or is not contacted by the complainant within 15 business days, STA can administratively close the complaint. A complaint can also be administratively closed if the complainant no longer wishes to pursue it. The STA investigator will send a final letter of resolution to the complainant when the investigation is complete.

If a citizen wants more information on STA's commitment to nondiscrimination, or requires a copy of the Title VI Complaint Form in an alternative format due to a disability, they can contact the STA Ombudsman:

STA Ombudsman
1230 West Boone Avenue
Spokane, WA 99201
(509) 325-6094
TTY Relay 711

Title VI Complaint Form

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by an STA employee may file a Title VI complaint by completing and submitting the official Title VI Complaint Form provided on STA's website.

Complaint forms in English, as well as the three safe harbor languages (Spanish, Russian and Vietnamese) are available upon request or online at: <https://www.spokanetransit.com/projects/title-vi-non-discrimination-policy-and-plan/>

English: https://www.spokanetransit.com/wp-content/uploads/2021/12/Complaint_Form_EN.pdf

Spanish: https://www.spokanetransit.com/wp-content/uploads/2021/12/Procedure_SP-1.pdf

Russian: https://www.spokanetransit.com/wp-content/uploads/2021/12/Procedure_RU-1.pdf

Vietnamese: https://www.spokanetransit.com/wp-content/uploads/2021/12/Procedure_VI-1.pdf

Copies of the complaint forms can also be found in Appendix A.

Section 3 | Record of Title VI Investigations, Complaints, and Lawsuits

Based on 49 CFR Section 21.9(b), FTA requires all transit agencies to prepare and maintain a list of Title VI investigations, complaints, and lawsuits as listed below in Table 1.

Below is a list of lawsuits and complaints for 2020 – 2022.

Table 1. List of Title VI Investigations, Complaints, and Lawsuits

Type	Date	Summary – Basis of Complaint	Status	Action(s) Taken
Complaint	06/02/20	Member of public alleged driver pass-by was due to racial discrimination.	Closed	An investigation was conducted, including a review of audiovisual recordings. The complaint was unsubstantiated.
Complaint	01/19/22	Patron excluded from service for rule violation alleged racial discrimination	Closed	An investigation was conducted. The complaint was unsubstantiated.

Section 4 | Collection of Demographic Data

Overview

The following section is a demographic analysis of the population within STA’s Public Transportation Benefit Area (PTBA) using 2020 Census data. In order to be familiar with the low-income and minority demographics of the area, STA uses the most current and accurate data available from the US Census Bureau and the STA Rider Survey which is conducted once every two years.

The service area defined for STA’s Title VI Plan includes the cities of Spokane, Airway Heights, Cheney, Liberty Lake, Medical Lake, Millwood, and Spokane Valley, as well as limited unincorporated areas of Spokane County. To better understand the population within STA’s PTBA, data was collected using U.S. Block Groups partially or completely within the PTBA boundary. Block Groups are statistical divisions of census tracts that contain between 600 and 3,000 people.

The following data for minority populations was collected from the 2016-2020 American Community Survey (ACS) 5-year period estimates. In this report, “low-income” refers to people who are identified as living in poverty by the US Census Bureau¹. An individual’s federal poverty status is determined based on his or her annual household income and number of persons in his or her household. The Federal Poverty Thresholds for 2020 consider an individual living alone under age 65 as living below the poverty line if he/she makes less than \$13,465 a year. Likewise, in a family of four with two children under 18, the household would have to make less than \$26,246 to be considered below the poverty line. The Census Bureau collects poverty data based on the thresholds established by the White House’s Office of Management and Budget. These thresholds are adjusted each year to inflation.

Table 2 summarizes the minority and low-income populations of all the block groups within STA’s PTBA, based on data from the 2020 5-year American Community Survey. Map 1 below is a base map of the PTBA and all the Spokane County census tracts that are contained within it.

Table 2. Minority and Low-income Population Summary

Description	Estimates
2020 STA PTBA Population Estimate*	442,449
Census Estimate of PTBA Population (Race)**	417,031
Census Estimate of PTBA Minority Population**	60,218
Estimate Percent Minority residing within PTBA	14.4%
Census Estimate of PTBA Population (Poverty Level) ***	402,610
Census Estimate of Low-Income Population***	55,854
Estimate Percent Low-Income residing within PTBA	13.9%

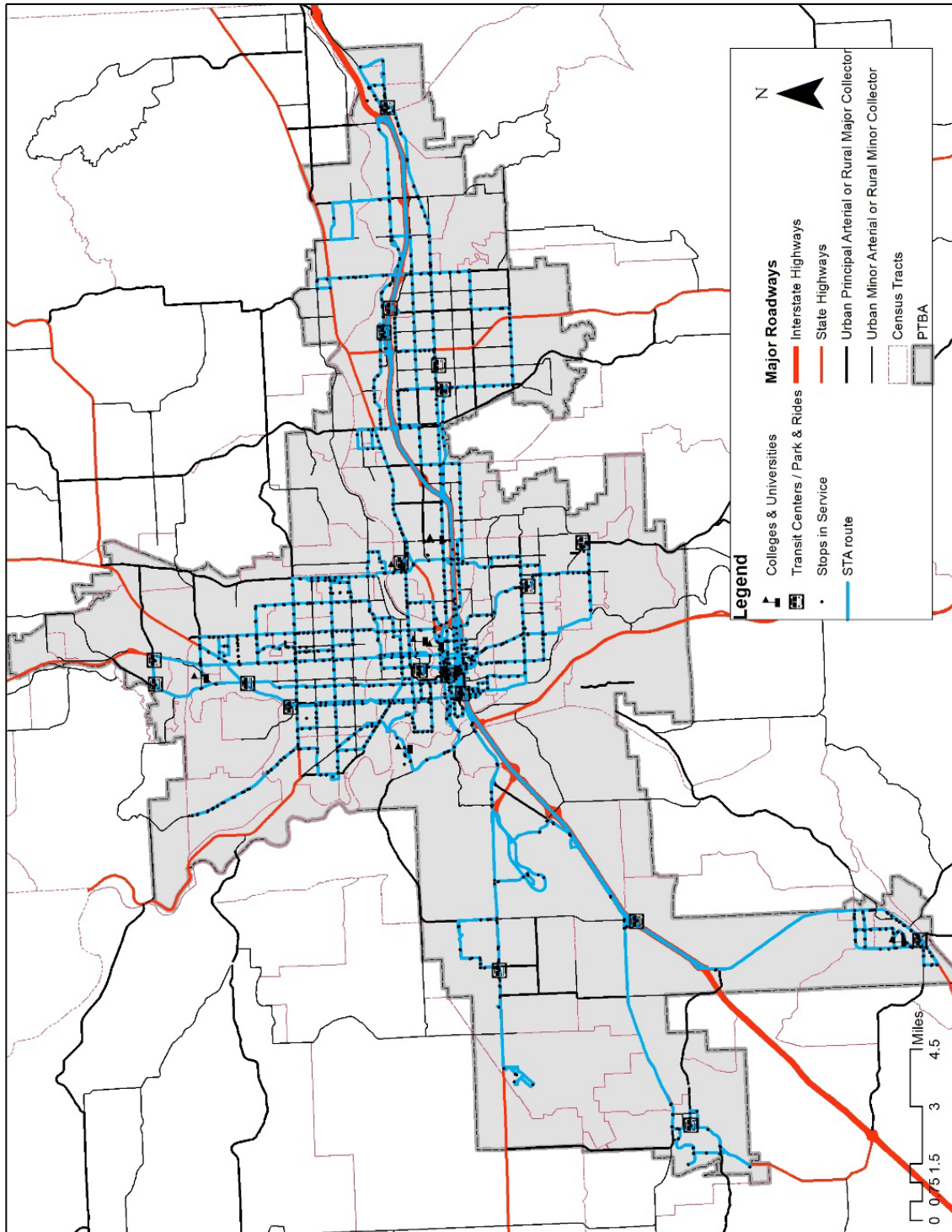
*Source: Washington State Office of Financial Management, Forecasting and Research Division

**Table B02001. Race, American Community Survey 2016-2020

*** Table B17021. Poverty Status, American Community Survey 2016-2020

¹ Refer to Table B17021. Poverty Status of Individuals in the Past 12 Months by Living Arrangement

Map 1. STA PTBA with Census Tracts



Use of The Demographic Analysis

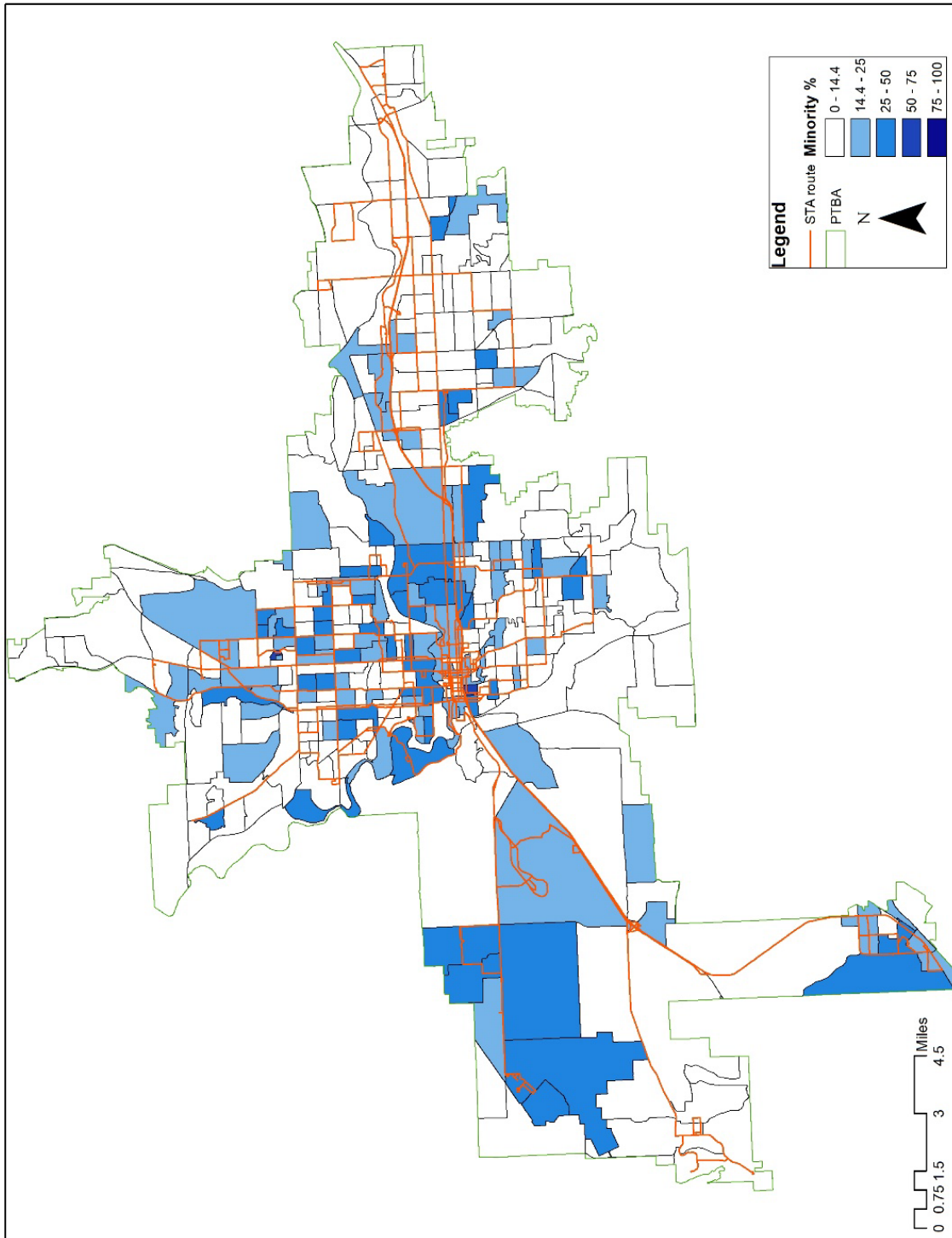
Using data from the 2017-2021 5-year ACS Community Survey, census block group information was tallied along each STA route to determine the total minority population, the total low-income population, and the total population living within ½ mile of a STA route. Using these totals, the percentage of minority and low-income population served by a route was calculated. Following STA policy, the highlighted routes (yellow for minority %, and red for low-income %) in Table 3 were higher than the PTBA estimate in Table 2 and identified as a minority and/or low-income routes. Maps 2 (minority population) and 3 (low-income population) identify the block groups that exceed the overall percentages for those populations in the PTBA.

Table 3. Minority and Low-Income Routes (December 2022)

Route	Population	Minority Population	Minority %	Population with Known Poverty Status	Low-income Population	Low-income %
4	34,672	4,819	13.9%	33,826	4,644	13.7%
6	23,013	3,817	16.6%	20,287	4,454	22.0%
11	2,351	465	19.8%	1,857	939	50.6%
12	8,069	1,332	16.5%	6,192	1,836	29.7%
20	7,201	1,263	17.5%	6,739	1,763	26.2%
21	6,941	1,424	20.5%	6,489	1,765	27.2%
22	12,629	1,731	13.7%	12,002	2,276	19.0%
23	21,844	2,729	12.5%	21,123	3,022	14.3%
25	24,280	3,962	16.3%	21,522	5,154	23.9%
26	20,559	4,068	19.8%	18,369	5,436	29.6%
27	21,971	3,637	16.6%	21,151	4,726	22.3%
28	21,569	3,753	17.4%	18,857	5,287	28.0%
29	9,122	1,930	21.2%	7,289	2,459	33.7%
32	13,683	1,815	13.3%	13,627	2,026	14.9%
33	25,135	4,289	17.1%	24,892	4,164	16.7%
34	9,782	1,450	14.8%	9,681	1,445	14.9%
35	22,020	2,986	13.6%	21,755	3,137	14.4%
36	19,870	3,615	18.2%	17,948	4,497	25.1%
39	14,361	2,675	18.6%	12,425	4,056	32.6%
42	6,974	1,398	20.1%	6,457	1,371	21.2%
43	21,125	3,284	15.5%	20,545	2,909	14.2%
45	11,446	1,697	14.8%	10,858	2,360	21.7%
60	13,536	2,780	20.5%	11,513	2,462	21.4%
61	16,805	3,549	21.1%	14,416	2,754	19.1%
62	16,840	2,651	15.7%	15,717	2,372	15.1%

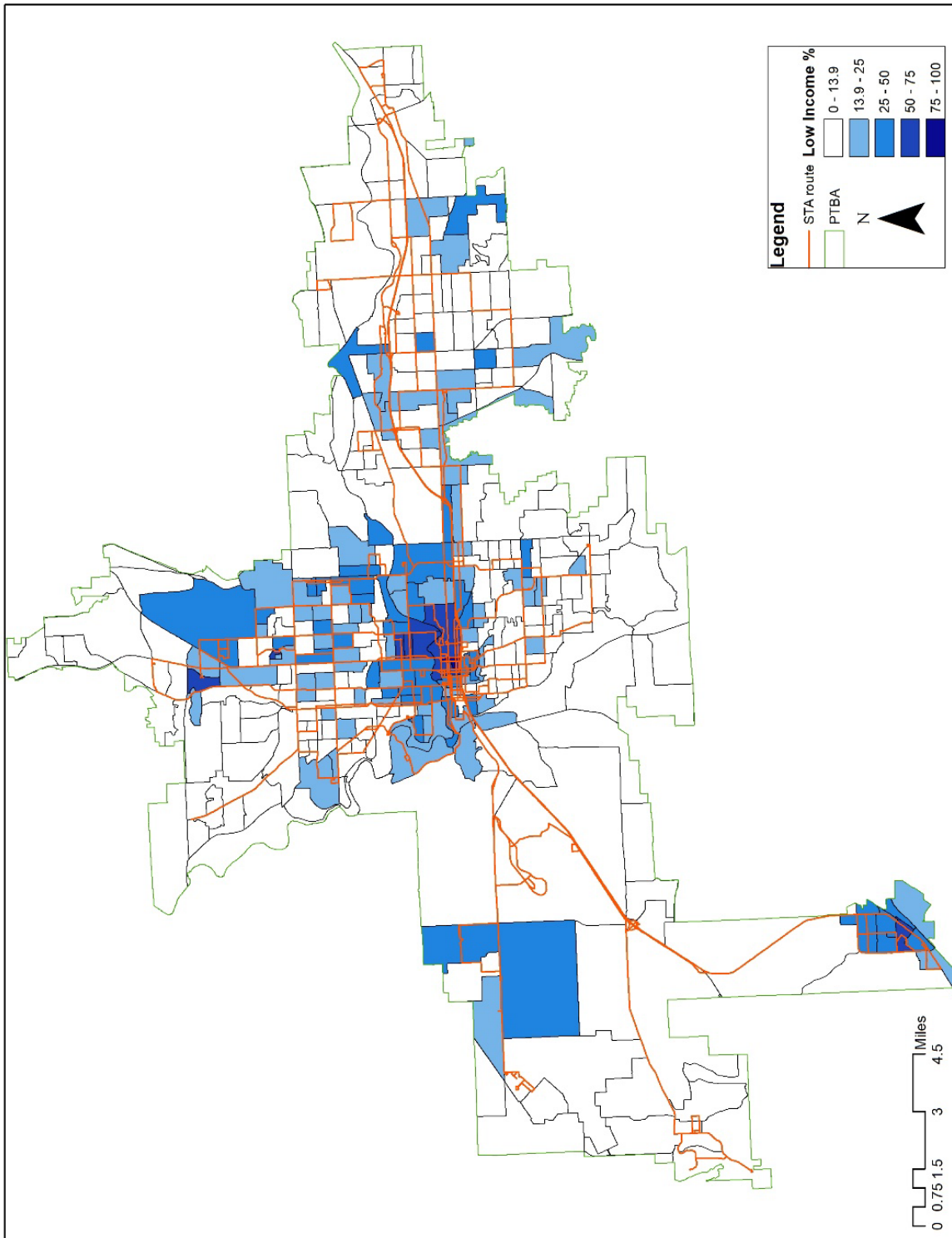
Route	Population	Minority Population	Minority %	Population with Known Poverty Status	Low-income Population	Low-income %
63	7,552	1,665	22.0%	6,016	632	10.5%
66	18,311	3,138	17.1%	16,935	3,497	20.6%
67	8,083	1,275	15.8%	7,307	1,867	25.5%
68	8,083	1,275	15.8%	7,307	1,867	25.5%
74	30,963	4,597	14.8%	30,308	4,582	15.1%
90	17,488	2,961	16.9%	15,369	3,680	23.9%
94	19,178	3,095	16.1%	18,336	3,595	19.6%
95	15,462	1,682	10.9%	15,298	1,876	12.3%
96	20,143	2,568	12.7%	19,980	2,725	13.6%
97	28,461	3,097	10.9%	28,227	2,687	9.5%
98	18,699	2,018	10.8%	18,484	2,044	11.1%
124	21,502	2,884	13.4%	20,322	3,305	16.3%
144	16,649	2,130	12.8%	16,080	1,974	12.3%
172	33,328	4,739	14.2%	32,600	4,856	14.9%
173	19,641	3,772	19.2%	18,927	3,955	20.9%
190	19,379	3,522	18.2%	18,432	4,076	22.1%
223	21,515	2,636	12.3%	20,819	2,580	12.4%
294	14,580	2,269	15.6%	14,238	2,118	14.9%
633	12,580	2,084	16.6%	11,959	2,030	17.0%
661	18,259	3,068	16.8%	16,929	3,276	19.4%
662	38,205	5,591	14.6%	36,023	5,533	15.4%
663	33,052	5,422	16.4%	31,611	6,194	19.6%
664	25,546	3,626	14.2%	24,569	3,491	14.2%
724	33,328	4,739	14.2%	32,600	4,856	14.9%
771	22,167	3,946	17.8%	21,514	4,300	20.0%

Map 2. Block Groups Exceeding 14.4% Minority Population



Source: 2017-2021 ACS Community Survey

Map 2. Block Groups Exceeding 13.9% Low-income Population



Source: 2017-2021 ACS Community Survey

2022 STA Passenger Survey

STA conducted its most recent Title VI Passenger survey in December of 2022. The 2022 survey is used to determine which fare types have a higher use among minority and low-income riders. In addition, the objectives of the survey explored ridership behaviors of bus passengers, determined the leading reasons for riding the bus, and evaluated STA service and performance. STA recently introduced a new fare payment system, Connect , in October 2022, which provided for a physical card option and a mobile application e-card option. The survey was conducted during a transition period of fare payment methods (meaning STA has two fare payments systems, via the Connect fare system and its legacy onboard farebox). STA will pursue an updated passenger survey at a later date once adoption of the new fare payment system is more widespread to better understand usage as it pertains to impacted populations. A copy of the 2022 survey instrument can be found in Appendix B.

Rider Census Survey Conclusions

Based on the sample data gathered for this survey, 24.8% identified as minority and 55% identified as low-income as defined by the Federal government. Low-income was measured by comparing the income bracket and household size reported by individuals with the 2022 Federal poverty guidelines. Respondents who reported a median income at or below the poverty threshold for their household size were considered low-income for the purpose of this analysis.

Based on the results of the survey, 65% of all respondents used the Connect fare system to pay for their trip, while 35% continued to use the legacy fare system. For those using the legacy system, 43% of those users were using either an employee or school/university sponsored bus pass. Another 22% of those respondents using the legacy system (7.5% of overall respondents) paid their fare in cash. For those respondents using the Connect fare system, 70% of those respondents used physical cards, compared to 30% mobile application users.

Those respondents who identified as minority were more likely to have paid for their fare using the Connect fare system (63%) rather than the legacy fare system. Only 8% of respondents identifying as minorities used cash to pay for their fare. Most low-income respondents (61%) also used the Connect fare system, with only 8% of respondents indicating they paid a cash fare. Type of pass and fare payment in the legacy system was consistent for low-income as compared to all riders that were surveyed, with the exception of employee sponsored bus pass, which was used at a much lower rate for low-income respondents.

Section 5 | Public Participation Plan

Overview

To encourage public participation in STA's planning activities, the STA Board of Directors adopted a list of Communication Public Outreach goals, principles, and policies as part of the STA comprehensive plan, *Connect Spokane*, in September 2010 and revised on May 18, 2022. These policies are incorporated into the Title VI program. STA will apply these adopted measures when performing outreach efforts to minority, low-income, and limited English proficient (LEP) populations and will use the appropriate outreach tools depending on the scale of projects including major service and fare changes.

Communications and Public Input

As a public agency, STA believes that proper communications and public input is of the highest importance. To ensure transparency, accountability, and fairness, STA must use a broad range of communication tools to reach as many people as possible. As technology improves, the amount of information available and the speed at which it can reach those interested improves daily, creating both opportunities and challenges. Fortunately, STA leverages this variety of communications tools to both inform and gather information. Goals of public outreach efforts include, but are not limited to, building relationships through community involvement, education regarding transit issues/options, and soliciting valuable input.

In addition to engaging the public, STA seeks to engage and include minority, low-income, and LEP populations in public outreach activities. This is especially important when the proposed changes impact bus service in these communities.

STA uses a variety of strategies to disseminate information that pertains to proposed service changes that impact protected groups. In addition to wide distribution of brochures that detail proposed changes, the agency also utilizes rider alerts, text and e-mail notifications, social media and posters on its entire fleet. STA hosts project/policy specific open houses and distributes information via e-mail to contact lists generated by those open houses. It also utilizes advertising and leverages earned media coverage with local news outlets. Detailed information is made available on STA's web site and is also distributed through local neighborhood associations, school districts and social service agencies (including those focused on LEP outreach). STA solicits comments in person, by e-mail, via the project website, U.S. mail, and by phone.

STA's Communications and Public Input goals and policies, as well as potential communication tools, can be found in the Board-adopted *Connect Spokane: A Comprehensive Plan for Public Transportation*, located here: <https://www.spokanetransit.com/projects/comprehensive-plan/>

Public Outreach Techniques for Title VI Populations

Depending on the project, STA may use a variety of different outreach techniques to engage Title VI populations. Some of these include:

- Providing information with meeting notices on how to request translation assistance.

- Visualization techniques including maps and graphics to assist Title VI populations.
- When multiple meetings are held for a single subject, efforts are made to use different meeting locations, days of the week, and times of the day.
- Informing organizations within the community that work closely with low-income and minority populations to inform them of public meetings, open houses, and other STA activities so they can get the word out to these populations they serve.
- Published notices in newspapers serving primarily minority populations.
- Targeted ads on social media platforms.
- On board rider survey to gather demographic data.

Summary of Public Outreach and Involvement

STA has conducted numerous public outreach efforts with the general population and targeted outreach efforts to specific limited-English populations, low-income, and minority groups. Below is a listing of some of these activities by project or mode for the last three years. Please note this is not an exhaustive list but rather a summary of activities.

Division Connects:

The Division Connects: Division Street Corridor Study was a coordinated effort between the Spokane Regional Transportation Council (SRTC), , the City of Spokane, Spokane County, the Washington State Department of Transportation (WSDOT) and STA. The study kicked-off in 2019 and concluded in early 2022. The Division Street Corridor Study looked at the future of transportation and land use along this important street in Spokane. The key elements of this Study were:

- Examine opportunities and identify a preferred concept for rubber-tired High-Performance Transit (HPT) in the corridor. This is identified in STA’s Transit Development Plan as Bus Rapid Transit (BRT).
- Develop options for all modes of travel throughout the corridor. This includes freight, pedestrian, and bicycle movements.
- Recommend capital projects implementation plans such as bus stop improvements, Business Access and Transit (BAT) lanes, and improved active transportation connections
- Identify land use opportunities.

Outreach included multiple presentations to community and neighborhood groups that included online opportunities to comment, including questionnaires available in multiple languages, as well as an online map and comment feature with associated translation features. A postcard was sent to all property owners within 1/8-mile of the corridor. Additionally, a statistically significant phone survey was conducted that confirmed the general outreach conclusions.

Connect 2035:

Connect 2035 is STA’s strategic plan update, outlining a strategic roadmap for public transportation service through 2035. Public outreach included the following:

- STA Board Involvement that included one-on-one interviews with each individual Board member, as well as four distinct workshops with the Board members.
- Public Outreach

- Community Organization Leader Outreach that included a series of insight interviews with 27 community leaders, including representatives from minority and low-income organizations.
- Online Community Survey that was available in English and the safe harbor languages.
- Three community Events that STA staffed, which included interactive activities with the public.
- A series of listening sessions held with targeted community members from underrepresented groups, including low-income, minority, refugees, and immigrants.

Connect Implementation:

The introduction of the Connect fare payment system came with a full outreach component. All information was available on STA’s website in multiple languages via Google translation services. Connect Ambassadors rode various routes, handing out information cards in English and Spanish to riders, while other Connect Ambassadors staffed a booth at the STA Plaza. Social media was used consistently throughout the implementation period to educate riders.

Project Specific Outreach

STA may conduct project specific outreach for low-income, limited-English proficiency and minority groups during the public input phase of the project. Notable examples of this outreach include:

- Inviting specific stakeholders to listening sessions to gather input and encourage participation,
- Sending notice of online public surveys to an agency-maintained distribution list (for limited English proficiency, minority and low-income groups),
- Placing the Title VI non-discrimination notice on fliers and invitations to outreach events. If space is limited, this may only include the statement *“If information is needed in another language, contact (509) 325-6094,”* and translated into the safe harbor languages.
- Outreach and sponsorship at community events that interact with minority, low-income and limited English populations. Examples include Unity in the Community, Valleyfest, and Bloomsday.
- Collection of demographic data at outreach events to understand what groups are participating.

Section 6 | Limited English Proficiency Analysis and Language Assistance Plan

Introduction

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. In *Lau v. Nichols*, 414 U.S. 563 (1974), the U.S. Supreme Court interpreted Title VI regulations as prohibiting conduct that has a disproportionate effect on persons with Limited English Proficiency (LEP) because such conduct constitutes national origin discrimination.

To analyze and address the needs of LEP populations, STA has developed a Language Assistance Plan that outlines outreach strategies to ensure that LEP persons have meaningful access to its programs and services. These outreach strategies were developed by conducting a Four-Factor Analysis in accordance with the Federal Department of Transportation's LEP guidance.

Four-Factor Summary

Within the STA service area, LEP persons represent 2.5% of the total population. Of that LEP population, 4.7% primarily commute by transit. Based upon these findings, STA has concluded that extensive outreach to LEP populations provides minimal results. There are few LEP people within the STA service area, and only a small portion of them use public transit. There are many services within the community that work with LEP populations to assist them in how to use the bus. As a result, the appropriate level of outreach is minimal, but includes targeted notifications to LEP organizations (depending on the project), language translation upon request, website translation, and staff training.

The Four-Factor Analysis

This analysis will identify and answer four questions to assist in the development of the Language Assistance Plan and determine the level of LEP assistance needed. These four questions are as follows:

- What is the number and proportion of LEP persons served or encountered in the eligible service population?
- What is the frequency with which LEP individuals encounter an STA program, activity, or service?
- What is the nature and importance of the program, activity, or service provided by STA to the LEP community?
- What are the resources available to SSTA and overall costs?

Service Coverage

The service area defined for STA’s Title VI Plan includes the cities of Spokane, Airway Heights, Cheney, Liberty Lake, Medical Lake, Millwood, and Spokane Valley, as well as limited unincorporated areas of Spokane County. To better understand the population within STA’s PTBA, data was collected using U.S. Census Tracts partially or completely within the PTBA boundary. While this method of measurement does account for a small number of people outside of the geographic bounds of the PTBA, it was important to include these tracts, ensuring that LEP populations were included in the demographic analysis. LEP persons may use transit to reach destinations throughout the PTBA including employment, colleges and universities, health clinics, and housing.

Methods of Data and Information Gathering:

- Collected census data on LEP populations by census tract (Table 4), language spoken (Table 5), and transportation mode (Table 6) for the PTBA
- Sent an electronic letter to a list of service providers working with LEP populations in Spokane County and asked them to participate in an online survey through Survey Monkey. STA received responses from 29 different organizations. The letter to service providers along with a sample survey, and the results are included in Appendix C.

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

Census Overview

Individuals demonstrating a limited ability to read, write, speak, or understand English are considered to have limited English proficiency. According to the 2021 American Community Survey (ACS), 12,450 of the 500,322 people within the PTBA reported speaking English “less than very well”, or 2.5% (Table 4). Map 4 shows the percent of LEP population within the PTBA by census tract.

Table 4. PTBA LEP Population by Census Tract

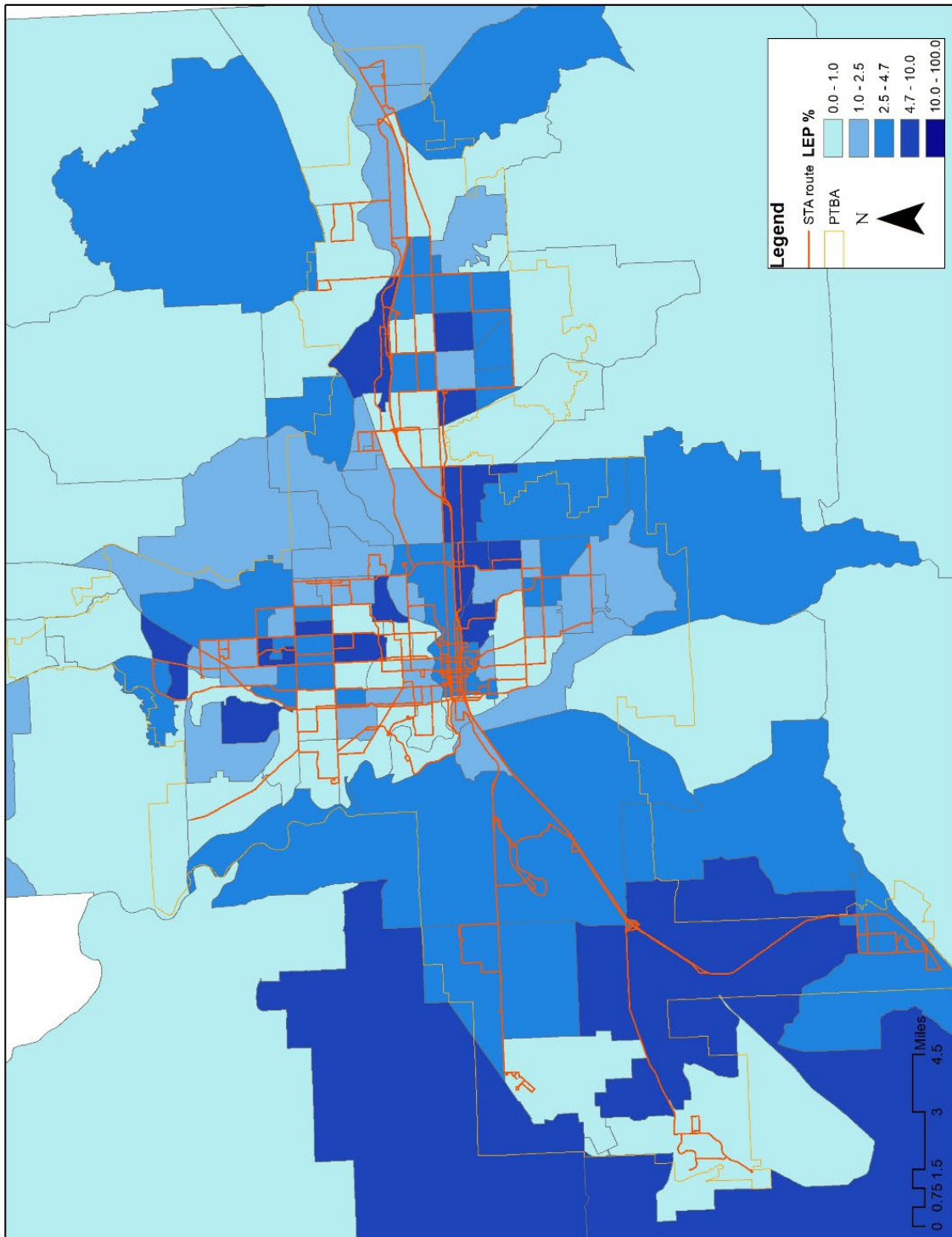
Census Tract	Total Population	Estimate Speaks English Less Than Very Well	Percent
2.01	2,586	38	1.5%
2.02	1,267	23	1.8%
3.01	2,532	106	4.2%
3.02	2,536	185	7.3%
4	3,600	168	4.7%
5	3,225	95	2.9%
6	3,023	27	0.9%
7	4,987	8	0.2%
8	5,110	30	0.6%
9	5,839	11	0.2%
10	5,058	19	0.4%

Census Tract	Total Population	Estimate Speaks English Less Than Very Well	Percent
11	3,128	44	1.4%
12	2,220	78	3.5%
13	3,238	12	0.4%
14	5,815	441	7.6%
15	5,505	18	0.3%
16	3,114	361	11.6%
18	2,727	163	6.0%
19	3,294	21	0.6%
20	3,884	71	1.8%
21	2,476	24	1.0%
23	4,697	0	0.0%
24	2,827	66	2.3%
25.01	3,073	9	0.3%
25.02	2,388	22	0.9%
25.03	3,205	29	0.9%
26	4,525	604	13.3%
29	3,012	196	6.5%
30	2,366	153	6.5%
31	4,630	353	7.6%
32	2,816	117	4.2%
35	2,638	70	2.7%
36.01	2,143	6	0.3%
36.02	2,298	30	1.3%
38	1,661	20	1.2%
39	2,078	51	2.5%
40.01	2,695	92	3.4%
40.02	2,232	0	0.0%
41	2,112	38	1.8%
42	4,412	27	0.6%
43	3,230	26	0.8%
44	4,582	52	1.1%
45	3,442	21	0.6%
46.01	3,727	89	2.4%
46.02	2,938	183	6.2%
47.01	3,005	62	2.1%
47.02	3,572	112	3.1%
48	3,855	112	2.9%
49	5,515	89	1.6%
50	4,074	58	1.4%
101.01	3,555	159	4.5%

Census Tract	Total Population	Estimate Speaks English Less Than Very Well	Percent
101.02	2,631	0	0.0%
102.01	4,192	10	0.2%
102.03	3,964	10	0.3%
102.04	2,958	0	0.0%
103.01	4,358	59	1.4%
103.03	3,267	73	2.2%
103.04	5,189	29	0.6%
103.05	7,342	45	0.6%
104.01	7,149	299	4.2%
104.03	3,166	184	5.8%
104.04	2,944	25	0.8%
105.04	3,262	14	0.4%
105.05	3,418	170	5.0%
105.06	5,123	146	2.8%
105.07	3,930	0	0.0%
105.08	3,980	0	0.0%
106.01	3,694	102	2.8%
106.03	4,117	40	1.0%
106.04	3,369	14	0.4%
107.01	3,918	202	5.2%
107.02	3,442	66	1.9%
108	2,233	33	1.5%
109.01	2,112	39	1.8%
109.02	3,259	4	0.1%
110	3,287	101	3.1%
111.02	3,928	46	1.2%
111.03	2,697	223	8.3%
111.04	3,037	86	2.8%
112.02	3,862	89	2.3%
112.03	5,214	224	4.3%
112.04	1,856	374	20.2%
113.01	3,633	110	3.0%
113.02	4,728	60	1.3%
114	5,024	32	0.6%
115	1,464	15	1.0%
116	1,606	19	1.2%
117.01	2,179	17	0.8%
117.02	6,820	450	6.6%
118	5,359	46	0.9%
119	4,779	130	2.7%

Census Tract	Total Population	Estimate Speaks English Less Than Very Well	Percent
120	3,765	14	0.4%
121	2,450	15	0.6%
122	2,199	23	1.0%
123	5,528	317	5.7%
124.01	5,615	33	0.6%
124.02	6,143	52	0.8%
125	3,424	210	6.1%
126	3,799	52	1.4%
127.01	3,563	251	7.0%
127.02	2,672	91	3.4%
128.01	4,032	139	3.4%
128.02	3,484	154	4.4%
129.01	2,960	107	3.6%
129.02	7,079	197	2.8%
130.01	1,057	7	0.7%
130.02	2,731	83	3.0%
130.03	5,888	136	2.3%
131.01	6,414	77	1.2%
131.02	4,768	31	0.7%
132.01	6,985	42	0.6%
132.03	2,632	29	1.1%
132.04	4,373	46	1.1%
132.05	3,175	99	3.1%
133	3,204	17	0.5%
134.01	5,193	138	2.7%
135.01	1,561	43	2.8%
135.02	2,203	76	3.4%
135.03	5,554	0	0.0%
136	4,730	177	3.7%
137	2,968	134	4.5%
138	2,897	18	0.6%
139	5,323	25	0.5%
140.01	5,117	186	3.6%
140.02	6,042	180	3.0%
141	5,705	291	5.1%
142	3,447	27	0.8%
143	2,894	13	0.4%
144	4,113	71	1.7%
145	1,932	67	3.5%

Map 3. PTBA LEP Population by Census Tract



Source 2017-2022 ACS 5-Year Estimates

Data was collected at the county level to identify languages spoken by LEP populations. ACS data was provided at the county level in U.S. Census Bureau Table C16001: Language Spoken at Home for the Population 5 years and Over as a 5-year estimate, 2017-2021. Table 5 identifies the languages spoken by the LEP populations within Spokane County. Overall, 2.6% of the Spokane County population speaks a language other than English at Home while also speaking English less than “very well”.

Table 5. Language Spoken at Home by Ability to Speak English

Language	Estimate	% County Population	Speak English "very well"	Speak English less than "very well"	% Total Population who Speak Language less than "very well"	% Population of Language Speakers who Speak English less than "very well"
Total:	500,322					
Speak only English	463,525	92.6%				
Spanish	12,164	2.4%	8,896	3,268	0.7%	26.9%
Russian, Polish, or other Slavic languages ⁹²	6,599	1.3%	3,939	2,660	0.5%	40.3%
Other Asian and Pacific Island languages	3,863	0.8%	2,598	1,265	0.3%	32.7%
Other Indo-European languages	3,409	0.7%	2,125	1,284	0.3%	37.7%
Arabic	1,895	0.4%	1,010	885	0.2%	46.7%
Vietnamese	1,760	0.4%	610	1,150	0.2%	65.3%
German or other West Germanic languages	1,614	0.3%	1,416	198	0.0%	12.3%
Other and unspecified languages	1,527	0.3%	1,041	486	0.1%	31.8%
Tagalog (incl. Filipino)	1,218	0.2%	808	410	0.1%	33.7%
Chinese (incl. Mandarin, Cantonese)	1,006	0.2%	488	518	0.1%	51.5%
French, Haitian, or Cajun	981	0.2%	894	87	0.0%	8.9%
Korean	761	0.2%	522	239	0.0%	31.4%

Source: U.S. Census Bureau 2017-2021 American Community Survey 5-Year Estimates Language Spoken at Home

Input from Community Organizations

Based on survey responses, the most common languages encountered by community organizations are Spanish, and Russian, followed by Marshallese, Ukrainian, Farsi, Arabic, Vietnamese, and Swahili.

Factor 2: The Frequency with Which LEP Individuals Come into Contact with a STA Program, Activity, or Service

Census Overview

The 2021 ACS 5-year estimates include data on main mode of commute to work among LEP and non-LEP populations. This data show that for the service area, 2.5% (6,179 out of 242,600) of total workers over the age of 16 are LEP. LEP workers aged 16 and over who commute to work mainly by transit represent .1% (292 out of 242,600) of total commuters aged 16 and up. Of all the LEP commutes in the service area, only 4.7% (292 out of 5,330) use public transit for their work commute. Table 6 below shows percentages of LEP riders for each commute type.

Table 3. Means of Transportation to Work and Ability to Speak English

Description	PTBA Estimate	LEP Estimate within PTBA # Persons
Workers 16 years and over	242,600	6,179
Car, truck, or van – drove alone	179,798	4,009
Car, truck, or van – carpooled	21,853	1,300
Public transportation (excluding taxicab)	5,330	292
Walked	6,583	119
Taxicab, motorcycle, bicycle, or other means	3,441	142
Worked at home	25,595	317

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates. Table B08113: Means of Transportation to Work by Language Spoken at Home and Ability to Speak English.

Input from Community Organizations

- 74% of survey respondents indicated that their limited English proficiency clients they served relied on transit for their transportation needs.
- The most frequent locations LEP clients traveled to and from were Downtown Spokane, Northeast Spokane, and Northwest Spokane.

Translation Requests

There were numerous requests for translation received during the 2020-2022 assessment period. In 2020 there were 25 requests for translation services, in 2021 there were 13 requests, and in 2022 there were 88 requests. Many of these requests came from the Customer Service and Security, located in the downtown STA Plaza. Table 7 below identifies the languages assistance requested for by year.

Table 7. Translation Services Requested by Year and Language

Language	2020	2021	2022	% Language Requested
Spanish	1	2	81	67%
Russian	20	7	6	26%
Amharic	3			2.4%
Ukrainian	1			0.8%
Arabic		1		0.8%
Bosnian		1		0.8%
Burmese		1		0.8%
Mandarin		1		0.8%
Vietnamese			1	0.8%
TOTALS	25	13	88	

Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by STA to the LEP Community

Description of Services

As a regional public transportation agency, STA provides vital connections between residents and employers, educational institutions, medical centers, shopping malls, intermodal transportation centers such as the Spokane International Airport, and Fairchild Air Force Base. Serving downtown Spokane, Spokane Valley, and five other cities within the PTBA, STA operates within an area encompassing approximately 248 square miles and 467,839 residents, or 84.9% of the county population (based on Washington State Office of Financial Management 2022 PTBA population estimates and April 2022 county population estimates).

In addition to fixed route services, STA provides Americans with Disabilities Act (ADA) Paratransit and Vanpool services. Paratransit is door-to-door service provided within a defined service area, during fixed route operating hours, to eligible individuals whose disability prevents them from using fixed route bus service. Vanpool (Rideshare) service augments STA’s public transportation system through the assignment of passenger vans to vanpool groups.

Factor 4: The Resources Available to STA and Overall Costs

This step allows STA to weigh the demand for language assistance against its current and projected financial and personnel resources. This analysis will help determine if the language services it currently provides are cost effective and should also help plan future investments that will provide the most needed assistance to the greatest number of LEP persons within the limits of STA resources.

Resources Currently Available

- STA's website is translatable with Google Translate.
- At least one Customer Service employee is fluent in Spanish.
- STA's Mobility Training program can use telephonic interpreters when teaching an LEP person to ride the bus.
- STA contracts with CTS LanguageLink to provide telephone interpretation. These services are used by Paratransit Reservations, Security, Customer Service, and the Ombudsman.
- STA contracts with NWI Global to provide written translation services upon request of an individual. These services are also used when STA is conducting targeted written outreach.
- The Ombudsman provides training to fixed-route and paratransit operators, security, and customer service representatives on how to assist LEP persons that require language assistance.

Costs

- A number of local organizations serve LEP populations in a variety of ways including translation, ESL education, networking, job training, housing and other basic services.
- The cost for telephonic translations from CTS LanguageLink for the time period 2020-2022 was \$550.15.

Determination of LEP Assistance Needed

Within the STA service area, LEP persons represent 2.5% of the total population. Of that LEP population, 4.7% commute mainly by transit. Based upon these findings, STA has concluded that extensive outreach to LEP populations provides minimal results. There are few LEP people within the STA service area, and only a small portion of them use public transit.

Plan for Assisting LEP Populations and Individuals

This plan was created in accordance with the determination of LEP assistance required with the STA service area based upon the findings of the Four-Factor Analysis. Below are strategies STA may use when assisting persons of limited English ability.

Targeted notifications to LEP organizations

Depending on the scope of the project and the populations involved STA may do any of the following:

- Send updated information concerning fare changes or major service changes to community organizations (as identified in the distribution list) that serve LEP populations.
- Update the distribution list as needed.
- Send surveys to community organizations inquiring about the demographics the LEP populations they serve and about the services they provide.
- Work with community organizations to distribute STA information in needed languages.

Language Assistance Measures

The language assistance notice will be posted at the Plaza and on the STA website as well as on all STA revenue service vehicles. Notice of translation service will be provided in Spanish, Russian, and Vietnamese, the three identified “Safe Harbor” languages. An example of the language assistance notice is:

If information is needed in another language, contact (509) 325-6094.

Si necesita información en otro idioma, comuníquese al (509) 325-6094.

Для получения информации на другом языке звоните по тел. (509) 325-6094.

Nếu quý vị cần thông tin bằng một ngôn ngữ khác, xin vui lòng gọi số (509) 325-6094.

Language Translation Upon Request

The STA Ombudsman will provide plans, forms, and other STA documents available in languages requested by an LEP individual. STA will work with a translator if language assistance is needed for oral communication.

Below is copy of the “Point to your language” poster that is used by customer service as a tool to assist people needing translation service (Figure 1).

After learning the language needed, customer service will contact CTS LanguageLink for translation services.

Figure 1. Point to your language poster

TRUSTEDMULTILINGUALCOMMUNICATION

Point to your language

Amharic አማርኛ	Hebrew עברית	Portuguese Português
Arabic العربية	Hindi हिन्दी	Punjabi ਪੰਜਾਬੀ
Bosnian (Serbo-Croatian) Bosanski	Hmong Hmoob	Romanian Română
Burmese မြန်မာစာ	Italian italiano	Russian Русский
Cambodian ខ្មែរ	Japanese 日本語	Somali Soomaali
Cantonese 廣東話	Karen ကရင်	Spanish Español
Haitian Creole Kreyól Ayisyen	Kirundi Ikirundi	Swahili Kiswahili
Farsi فارسی	Korean 한국어	Tagalog Tagalog
French Français	Laotian ພາສາລາວ	Thai ภาษาไทย
French-Canadian français canadien	Mandarin 國語	Tigrinya ትግርኛ
German Deutsch	Nepali नेपाली	Urdu اردو
Turkish Türkçe	Polish Polski	Vietnamese Tiếng Việt

Over 240 languages 24|7|365

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Find us online: [ctslanguagelink](https://ctslanguagelink.com)

Telephone: 1.800.208.2620

We speak your customer's language

Website Translation

The STA website is equipped with Google Translate software to assist LEP populations when navigating online. This software includes translation services for each of the Safe Harbor Languages listed in this plan.

Staff Training

The LEP Plan is distributed to all STA customer service employees. This information will be part of STA's staff orientation process for all new customer service employees. Training topics include:

- STA's Title VI LEP policy and procedures.
- Language assistance offered by STA.
- Procedures for accessing an interpreter.

Transit Operators are trained on STA's procedure for assisting LEP populations. This training includes the following:

- Be respectful.
- Use short simple sentences which are easier for the person speaking to you.
- Speak in single words which may help the customer.
- If the operator is talking through an interpreter, direct the conversation to the customer, not the interpreter.
- Don't pretend to understand if you have difficulty understanding a customer's communications style. Instead, ask them to slowly repeat the information because it may be important.
- Try visuals, have them write it down or point to a map. Be creative. Think charades.
- For language assistance, refer to the "Road Rules" posting on each coach located behind the Driver's seat. Refer people to the STA's Ombudsman at (509) 325-6094 if necessary.
- If further assistance is necessary, contact Dispatch, or if at the Plaza, direct them to Customer Service or Security for translation assistance.

Monitoring and Updating the LEP Plan

This plan is designed to be flexible and easily updated. At a minimum, STA will follow the Title VI program update schedule for the LEP plan.

Each update should examine all plan components such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in the service area?
- Has there been a change in the types of languages that translation services are needed?
- Is there still a need for continued language assistance for previously identified STA programs?
Are there other programs that should be included?
- Have STA's available resources, such as technology, staff, and financial costs, changed?
- Has STA fulfilled the goals of the LEP plan?
- Were there any complaints received?

Safe Harbor Provision

According to the US Department of Justice’s (DOJ) Safe Harbor Provision, adopted by US Department of Transportation (DOT), if a recipient of federal funds provides written translation of vital documents for each LEP language group that constitutes five percent (5%) or 1,000 persons of the total population served by the agency, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations. As of the 2021 ACS 5-year estimates, Spanish, Russian, Arabic, Vietnamese, Tagalog, and Chinese qualify as “Safe Harbor” languages in Spokane County. STA will consider these as “Safe Harbor” languages in Spokane’s Public Transportation Benefit Area (PTBA).

Dissemination of the STA LEP Plan

STA will post the LEP plan on its website as part of STA’s overall Title VI Program, found here: <https://www.spokanetransit.com/projects/title-vi-non-discrimination-policy-and-plan/>

An LEP person may obtain copies of the plan upon request. Any questions or comments regarding this plan should be directed to:

Community Ombudsman and Accessibility Officer
1230 W. Boone Avenue
Spokane, WA 99201
(509) 325-6094
TTY Relay 711
ombudsman@spokanetransit.com

Section 7 | Ensuring Subrecipient Compliance

Program Overview

STA is the designated recipient of 5310 funds in the Spokane region. This program provides formula funding for the purpose of assisting private nonprofit groups in meeting the transportation needs of seniors and people with disabilities when the transportation service provided is unavailable, insufficient, or inappropriate to meeting these needs. The program aims to remove barriers to transportation service and expand transportation mobility options. Eligible subrecipients include private nonprofit organizations, states or local government authorities approved to provide human services transportation, or operators of public transportation.

Subrecipients must submit Title VI Programs to STA to assist in compliance efforts. STA requests the Title VI Plans to be submitted electronically. Some of the subrecipients do not have Title VI plans and are given at least 90 days (from execution of agreement) to get a plan approved. If extra time is needed the subrecipient must request an extension from STA. Subrecipients must submit an updated Title VI plan every three years to be reviewed and approved by STA to ensure plans remain compliant.

STA staff helps subrecipients with regards to compliance. Subrecipients are provided with templates, checklists, and other technical assistance to ensure they have the resources to write, adopt and implement a Title VI Plan. Subrecipients are given the choice to adopt STA's notice to beneficiaries, complaint procedures and complaint form, public participation plan, and language assistance plan where appropriate. The subrecipient can modify when necessary. The subrecipient must also submit to STA a list of Title VI complaints, investigations, and/or lawsuits. Additional technical assistance is provided on an as-needed basis.

To ensure that all subrecipients comply with Title VI regulations, STA staff monitors the performance of subrecipients a minimum of every three years. The subrecipient monitoring process is summarized below.

Steps to Ensure Title VI Compliance of Subrecipient

The procedures listed below have been revised to reflect procedures from current FTA circulars to include, but not limited to, the main FTA circular C 4702.1B.

- Ensure that project agreements with subrecipients contain all required federal clauses.
- On an annual basis, send a notice to subrecipients requesting a copy of A-133 audit report or other financial documentation (if the subrecipient received less than \$750,000 in federal funding from all sources).
- The Subrecipient will sign the application for funding to certify that they will carry out the program in compliance with FTA's Title VI regulations. This is a requirement before STA can provide any federal funds to the subrecipient.
- Subrecipients shall submit their Title VI Program to STA to have on file. STA also files a copy of the agreement and contract.

- Every Title VI program shall at a minimum include the following information:
 1. A copy of the Title VI Notice to the public and location it is posted for public to view (local newspaper, website, work locations, and/or posted inside vehicles).
 2. Title VI discrimination complaint procedures.
 3. Copy of the complaint form.
 4. List of complaints, investigations, or lawsuits related to public transportation activities.
 5. Most recent census data to identify demographics of service area including minorities, language spoken at home, and income.
 6. A public participation plan that includes an outreach plan to engage minority and limited English proficient populations. **Note: In lieu of developing their own public participation plan, the subrecipient may adopt STA's plan.** Provide a summary of outreach efforts since last Title VI program submission, particularly to low-income, LEP, and minority populations.
 7. A copy of the subrecipient's plan for providing language assistance to persons with limited English proficiency, based on the four-factor analysis. **Note: In lieu of developing their own LEP Plan, the subrecipient may adopt STA's plan.**
 8. How notice is communicated that language assistance is available and how the plan is monitored and updated.
 9. How employees are trained to provide timely and reasonable language assistance.
 10. Information on transit-related, non-elected planning boards, advisory councils or committees with a table or narrative of racial breakdown of the membership and a description of efforts made to encourage participation of minorities.
 11. Any new subrecipient operating facilities requiring a Title VI equity analysis.
 12. Appropriate documentation showing that the organization's governing body or official(s) responsible for policy decisions have reviewed and approved the Title VI program.

Table 8 reflects subrecipients that currently have active projects using FTA Section 5310 funds.

Table 8. List of current STA Subrecipients

FTA Apportionment Year	Subrecipient/Organization	Project Title(s)
2019	Arc of Spokane	ADA Vehicle Purchase
	Southside Community Center	ADA Vehicle Purchase
	Spokane Transit	Complementary Paratransit
2020	Arc of Spokane	Community Center Transportation
	Special Mobility Services	Mobility Management
	Spokane Neighborhood Action Partners	ADA Vehicle Purchase & Neighbors on the Go
	Southside Community Center	ADA Vehicle Purchase- Additional Funds
	Spokane Transit	Complementary Paratransit
2021	Cancer Can't	Transportation for Cancer Patients
	COAST Transportation	Demand Response
	Special Mobility Services	Mobility Training & Spokane Shopper
	Spokane Neighborhood Action Partners	Neighbors on the Go
2022	Arc of Spokane	Community Center Transportation
	Cancer Can't	Transportation for Cancer Patients
	COAST Transportation	ADA Vehicle Purchase & Demand Response
	SNAP Resource Rides	Neighbors on the Go
	Spokane Transit	Contracted Human Services Transportation (estimated RFP in 2024)

Section 8 | System-wide Service Policies and Standards

Overview

STA’s System-wide Service Standards and the Service Policies were adopted by the STA Board in 2010 as part of the agency’s comprehensive plan, *Connect Spokane*. The plan was formed as part of an extensive public process. Amendments were made to the policies and standards in May 2022. A public hearing was held on April 21, 2022 and the Board adopted the amendments on May 19, 2022.

System-wide Service Policies

Table 9 below presents the system-wide service policies, which are meant to ensure that transit amenities (i.e., bus stops, benches, and lighting) are distributed fairly throughout the system and that vehicles are properly assigned on a route by route basis.

Table 9. System-Wide Service Policies

Service Policy	STA Definition
System-Wide Transit Amenities	<p><i>Installation of transit amenities along bus routes are based on the number of passenger boardings at stops and stations along those routes and the High Performance Transit facility standards with variances from this policy to support connectivity of routes and riders with limited mobility.</i> <i>(Connect Spokane - Annex 2)</i></p>
Signage at Bus Stops	<p><i>All STA bus stops shall feature signs mounted in a uniform manner to identify the area as a stop and provide readable and accurate information.</i> <i>(System Infrastructure - 2.7 Connect Spokane)</i></p>
Design Standards for Bus Stop Areas	<p><i>Coordinate with local and regional jurisdictions to establish, maintain and implement uniform design standards for the bus stop environment.</i></p> <p>Standardization of the elements that make up the bus stop area – including (but not limited to) benches, shelters, and lighting - results in less confusion for coach operators, passengers, and other users of the street right-of-way. Established, agreed-upon standards can also streamline the design of street improvements and the review of private development proposals. <i>(System Infrastructure - 2.7.1)</i></p>

Service Policy	STA Definition
Benches at Bus Stop	<p><i>STA will ensure that benches are placed properly, designed adequately, and serve the needs of customers sufficiently.</i></p> <p>Benches provide comfort for all types of passengers. Although local jurisdictions are responsible for the operations and maintenance of bus benches, coordination with STA increases the likelihood that everyone’s needs are being met. Generally, STA recommends bench locations which meet one of the following criteria:</p> <ol style="list-style-type: none"> 1) 10 or more weekday average boardings 2) Transfer point between two or more routes 3) Adjacent to ridership generator with a high proportion of riders with limited mobility <p><i>(System Infrastructure - 3.1 Connect Spokane)</i></p>
Shelters and Awnings	<p><i>The placement and maintenance of shelters or other weather cover for passenger waiting areas where appropriate shall be encouraged.</i></p> <p>STA shall work with local and regional jurisdictions to position bus shelters, awnings and other weather protection as funding allows and consistent with Title VI requirements. Shelters and awnings can encourage ridership by protecting waiting patrons from adverse weather elements. Shelters also provide an appropriate location for posting important ridership information. Stops with new shelters will comply with the Americans with Disabilities Act (ADA). Stops to have shelters funded by STA must meet at least one of the following criteria:</p> <ol style="list-style-type: none"> 1) 25 or more weekday average boardings 2) Transfer point between two or more routes 3) Adjacent to a ridership generator with a high proportion of riders with limited mobility. <p><i>(System Infrastructure - 3.2.1 Connect Spokane)</i></p> <p><i>The removal of shelters may occur after a review of ridership data and/or physical condition.</i></p> <p>In the programmed shelter replacement plan, STA reviews bus stops with less than 10 boardings per day and considers those locations for shelter removal. STA will also review a shelter’s physical condition based on a point rating of the frame, roof, panels, bench, and the concrete foundation.</p> <p><i>(System Infrastructure – 3.2.2)</i></p>

Service Policy	STA Definition
Lighting at Bus Stops	<p><i>STA works to provide pedestrian-scale lighting at stations, shelters, and general stops whenever possible.</i></p> <p>While any lighting enhances the safety and security of transit stops, benches, and shelters, lighting designed specifically to illuminate the path of a pedestrian can do a better job than general street lights.</p> <p><i>(System Infrastructure - 3.3 Connect Spokane)</i></p>
Bicycle Facilities	<p><i>Bicycles, including bicycle share, shall be accommodated at STA's facilities and on STA coaches.</i></p> <p>A good bicycle network and appropriate facilities are like a good pedestrian network and facilities. They can accompany transit to extend the range of non-motorized modes of transportation. By supporting bike share and bicycle ridership through short- and long-term bicycle parking, greater bicycle capacity racks on coaches, and other supportive efforts, STA can increase options for those who choose to travel by more than one mode.</p> <p><i>(System Infrastructure - 3.4 Connect Spokane)</i></p>
Vehicle Assignment	<p><i>STA bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route such as passenger loads and overall ridership of each route. Local routes with lower ridership may be assigned a smaller fixed route vehicle. Some routes requiring tight turns on narrow streets may be operated with smaller fixed route vehicles. The age of the vehicle shall not be a consideration when assigning the vehicle to a particular maintenance garage for daily service.</i></p> <p><i>(Connect Spokane - Annex 2)</i></p>

System-wide Service Standards

Table 10 below presents the system-wide service standards, which are quantitative performance standards meant to ensure that fixed route services are fairly distributed throughout STA’s service area.

Table 10. System-Wide Service Standards

Service Standard	STA Definition																														
On-time Performance	STA’s on-time performance objective is 93% or greater.																														
Vehicle Load	<table border="1"> <thead> <tr> <th>Vehicle Type</th> <th>Seated</th> <th>Standing</th> <th>Total</th> <th>Maximum Load Factor Ratio</th> </tr> </thead> <tbody> <tr> <td>30' Bus</td> <td>26</td> <td>20</td> <td>46</td> <td>1.77</td> </tr> <tr> <td>35' Bus</td> <td>32</td> <td>24</td> <td>56</td> <td>1.75</td> </tr> <tr> <td>40' Bus</td> <td>39</td> <td>29</td> <td>68</td> <td>1.74</td> </tr> <tr> <td>60' Bus</td> <td>62</td> <td>47</td> <td>109</td> <td>1.76</td> </tr> <tr> <td>60' BEB Bus</td> <td>41</td> <td>31</td> <td>72</td> <td>1.76</td> </tr> </tbody> </table>	Vehicle Type	Seated	Standing	Total	Maximum Load Factor Ratio	30' Bus	26	20	46	1.77	35' Bus	32	24	56	1.75	40' Bus	39	29	68	1.74	60' Bus	62	47	109	1.76	60' BEB Bus	41	31	72	1.76
Vehicle Type	Seated	Standing	Total	Maximum Load Factor Ratio																											
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35' Bus	32	24	56	1.75																											
40' Bus	39	29	68	1.74																											
60' Bus	62	47	109	1.76																											
60' BEB Bus	41	31	72	1.76																											
Service Availability	<p><i>STA balances customer access, service reliability, and system performance when determining the spacing and placement of bus stops.</i></p> <table border="1"> <thead> <tr> <th>Service Type</th> <th>Spacing</th> <th>Process</th> </tr> </thead> <tbody> <tr> <td>HPT</td> <td>Generally greater spacing than regular service it is replacing with a target of ½ mile outside the downtown core. (Minimum spacing of ¼ mile between most stations)</td> <td>Develop as part of corridor plan. General station locations are subject to formal board approval (not required for other stops)</td> </tr> <tr> <td>Regular</td> <td>Arterials and local streets: 800'-1500' seeking an average quarter-mile stop spacing Highway environments where speed limits exceed 40 mph: minimum ½ mile and where activity centers and infrastructure will support Rural/Limited access: subject to suitable location</td> <td>Implemented as part of normal service development. No formal consultation process except for stop closure or major upgrades as part of integrated improvements</td> </tr> <tr> <td>Targeted</td> <td>Subject to specialized service needs</td> <td>Same as Regular service</td> </tr> </tbody> </table>	Service Type	Spacing	Process	HPT	Generally greater spacing than regular service it is replacing with a target of ½ mile outside the downtown core. (Minimum spacing of ¼ mile between most stations)	Develop as part of corridor plan. General station locations are subject to formal board approval (not required for other stops)	Regular	Arterials and local streets: 800'-1500' seeking an average quarter-mile stop spacing Highway environments where speed limits exceed 40 mph: minimum ½ mile and where activity centers and infrastructure will support Rural/Limited access: subject to suitable location	Implemented as part of normal service development. No formal consultation process except for stop closure or major upgrades as part of integrated improvements	Targeted	Subject to specialized service needs	Same as Regular service																		
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Service Standard	STA Definition																																								
Vehicle Headway	<p>STA shall adhere to maximum headway standards when determining a route’s frequency.</p> <table border="1"> <thead> <tr> <th colspan="5">Maximum Headways (minutes)</th> </tr> <tr> <th>Service Class</th> <th>Variable</th> <th>Peak</th> <th>Base</th> <th>Sub-Base</th> </tr> </thead> <tbody> <tr> <td rowspan="3">HPT</td> <td>Mode: Bus Rapid Transit</td> <td>10</td> <td>15</td> <td>30</td> </tr> <tr> <td>Corridor Configuration: Urban</td> <td>15</td> <td>15</td> <td>30</td> </tr> <tr> <td>Corridor Configuration: Regional</td> <td>30</td> <td>30</td> <td>60</td> </tr> <tr> <td rowspan="4">Regular</td> <td>Service Family: Frequent</td> <td>15</td> <td>30</td> <td>60</td> </tr> <tr> <td>Service Family: Standard</td> <td>30</td> <td>30</td> <td>60</td> </tr> <tr> <td>Service Family: Basic</td> <td>60</td> <td>60</td> <td>120</td> </tr> <tr> <td>Service Family: Downtown</td> <td>30</td> <td>30</td> <td>60</td> </tr> </tbody> </table>	Maximum Headways (minutes)					Service Class	Variable	Peak	Base	Sub-Base	HPT	Mode: Bus Rapid Transit	10	15	30	Corridor Configuration: Urban	15	15	30	Corridor Configuration: Regional	30	30	60	Regular	Service Family: Frequent	15	30	60	Service Family: Standard	30	30	60	Service Family: Basic	60	60	120	Service Family: Downtown	30	30	60
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	Service Family: Basic	60	60	120																																					
	Service Family: Downtown	30	30	60																																					

System- wide Title VI Policies

The Title VI policies listed below are specific policies when implementing major service and all fare changes. They are also included in STA’s comprehensive plan *Connect Spokane*, which was last adopted in May 2022.

Table 4. Title VI Policies

Policy	STA Definition
System-Wide Title VI Policies	<p>STA will not “utilize criteria or methods of administration which have the effect of subjecting persons to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular race, color, or national origin.”</p> <p>STA will “take affirmative action to assure that no person is excluded from participation in, or denied the benefits of, the program or activity on the grounds of race, color, or national origin.” STA assures that “no person or group of persons shall be discriminated against with regard to routing, scheduling, or quality of service transportation on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color, or national origin.”</p>
Major Service Change Policies	<p>In developing annual plans and service changes, STA will assess whether changes meet the Major Service Change threshold. This threshold is as follows:</p> <ul style="list-style-type: none"> Cost Impacts: More than 5.0% reduction in revenue hours of service in any calendar year Ridership Impacts: 5% or more of annualized system ridership negatively impacted by loss of bus stop(s), trip(s) or route(s) at any given service change. A Title VI analysis and evaluation of the impacts of major service changes will be published prior to a formal public hearing on the service change or a draft recommendation is published, whichever comes first.

Policy	STA Definition
Service Change Disparate Impact Policy (minority)	<i>When a major service change impacts a census tract with a minority population that exceeds the average minority population of the service area by 10% or more, a disparate impact exists and the impacts will be assessed and evaluated for mitigation.</i>
Service Change Disproportionate Burden Policy	<i>When a major service change impacts a census tract with a low-income population that exceeds the average low-income population of the service area by 10% or more, a disproportionate burden exists and the impacts will be assessed and evaluated for mitigation.</i>
System-wide Transit Amenities Service Policy	<i>Installation of transit amenities along bus routes are based on the number of passenger boardings at stops and stations along those routes and the High Performance Transit facility standards with variances from this policy to support connectivity of routes and riders with limited mobility.</i>
Vehicle Assignment Service Policy	<i>STA bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route such as passenger loads and overall ridership of each route. Local routes with lower ridership may be assigned a smaller fixed route vehicle. Some routes requiring tight turns on narrow streets may be operated with smaller fixed route vehicles. The age of the vehicle shall not be a consideration when assigning the vehicle to a particular maintenance garage for daily service.</i>
Fare Change Policy	<i>STA evaluates fare changes to ensure fare increases do not disproportionately negatively impact a class protected under Title VI.</i>
Fare Change Minority Disparate Impact Policy	<i>If a fare change affects fare categories or payment methods used disproportionately by minority populations (10% or greater) than the overall population, a fare change disparate impact exists and the impacts will be assessed and evaluated for mitigation.</i>
Fare Change Low-Income Disproportionate Impact Policy	<i>If a fare change affects fare categories or payment methods used disproportionately by low-income populations (10% or greater) than the overall population, a fare change disproportionate burden exists and the impacts will be assessed and evaluated for mitigation.</i>
On-Time Performance Standard	<i>STA's on-time performance objective is 93% or greater.</i>

Section 9 | Evaluation of 2020-2022 Service and Fare Changes

Summary of Major Service and Fare Changes Implemented since previous Title VI Update

The following is a summary of the service and fare changes, and any associated equity analyses STA conducted for service or fare/fee changes implemented between March 2020 and February 2023.

Fare Changes

There have been no fare changes implemented since the 2020 Title VI Program update. There were two fare policy revisions adopted in 2022 by the STA Board of Directors. The first revision, adopted January 21, 2022, addressed the introduction of new fare payment methods, farecapping, and new discount programs. The second revision, adopted July 21, 2022, addressed the introduction of a zero-fare for youth ages 18 and under. Both policy revisions underwent a Title VI impact analysis process in accordance with the FTA C 4702.1B.

Copies of the Title VI equity analyses, along with Board minutes showing adoption of each of these actions, can be found in Appendix D to this report.

Service Changes

With a few exceptions, STA schedules periodic major and minor service changes to occur every January, May, and September (every four months).

Since January 2020, there has been one service change (August 2022) that met STA's adopted major service change threshold and for which a Title VI impact analysis was conducted. The analysis was conducted in 2021 in advance of the anticipated City Line launch, originally scheduled for Spring 2022 and now scheduled for Summer 2023. Copies of the Title VI equity analysis, along with Board minutes showing adoption of these actions, can be found in Appendix E to this report.

All other service changes have been minor and moderate service changes and route modifications. Per Connect Spokane, a Title VI analysis is not required for minor and moderate service changes. Table 12 below summarizes each of these service changes. Full descriptions of all changes are on file with the Planning Department.

Table 12. 2020 – 2022 Service Change Summary

Service Change	Overview of Service Changes
May 2020	Minor routing and scheduling adjustments; provide connections to 633 Geiger Shuttle that provides service to Amazon employees.
September 2020	Minor routing and scheduling adjustments; other planned adjustments moved to 2021/2022 due to impacts of COVID-19
January 2021	Minor routing and scheduling adjustments
May 2021	Minor routing and scheduling adjustments, includes improvement in service levels at the West Plains Transit Center
September 2021	Minor routing and scheduling adjustments; conversion of Route 64 into Route 6 with extended routing and improved frequency; implement new Route 661 EWU Express
January 2022	Minor routing and scheduling adjustments
May 2022	Minor routing and scheduling adjustments
August 2022	Major routing and schedule adjustments (Title VI analysis completed); new Routes 35, 36, 223, and 294; routing adjustments to Routes 22, 27, 32, 74, 94, 95, 96, and 98; earlier Sunday service on Routes 4, 6, 25, 33, 90, and 633; Plaza zones re-named to “Bays” and re-numbered; scheduling adjustments on most routes
January 2023	Minor routing and scheduling adjustments based on August 2022 customer feedback included more service on select routes addressing heavy demand, especially on routes that serve the area high schools

Facility Site Equity Analysis

There were no facilities constructed that required land acquisition and the displacement of persons from their residences and businesses.

Section 10 | Monitoring Transit Service

Overview

FTA requires transit providers to monitor the performance of their transit system relative to their system-wide service standards and service policies (i.e. vehicle load, vehicle assignment, transit amenities, etc.) not less than every three years.

Consistent with FTA guidance the performance standards compared in this analysis are meant to ensure transit services and amenities are equitably distributed throughout the system. This entails an analysis of:

- Vehicle load (average peak load factor compared with load factor at capacity)
- Vehicle headway (basic vs. frequent)
- On-time performance
- Services accessibility (distance to a bus stop)
- Vehicle assignment
- Distribution of transit amenities

Vehicle Load

STA sets a maximum load factor for each of its fixed routes based on the size of the coach used, as noted in the previous section. Table 13 identifies the vehicle load factor at the peak ridership hour (from Automatic Passenger Count data) for each route. Minority routes are shaded yellow. All routes meet the performance standard, being well within the load factor capacity.

Table 13. Vehicle Load Factor at Peak Ridership Hour (December 2021)

Route	Observed Peak Hour Load Factor	Max Load Factor
4	1.0	1.74
6	0.5	1.76
11	1.1	1.75
12	0.4	1.75
20	0.7	1.74
21	0.5	1.74
22	0.4	1.74
23	0.4	1.74
25	1.0	1.76
26	0.6	1.74
27	0.6	1.74
28	0.5	1.74
29	0.5	1.74

Route	Observed Peak Hour Load Factor	Max Load Factor
32	0.4	1.74
33	0.8	1.74
34	0.3	1.74
39	0.3	1.74
42	0.3	1.74
43	0.3	1.74
45	0.5	1.74
60	0.6	1.74
61	0.9	1.74
62	0.2	1.74
63	0.1	1.74
64	0.7	1.74
66	0.4	1.74
67	0.1	1.74
68	0.1	1.74
74	0.7	1.74
90	1.2	1.74
94	0.4	1.74
95	0.2	1.74
96	0.4	1.74
97	0.3	1.74
98	0.4	1.74
124	0.4	1.74
144	0.3	1.74
172	0.2	1.74
173	0.4	1.74
190	0.2	1.74
633	0.9	1.76
661	0.6	1.76
662	0.3	1.76
663	0.5	1.76
664	0.4	1.76

Vehicle Headway

All STA routes are meeting the minimum headway standards as shown in the previous section. Based on STA's headway standards, five of the six Frequent Routes in the STA system as of December 2022 (83%) are identified as both minority and low-income routes.

On-Time Performance

STA's on-time performance objective is 93% or greater. A report was run using the On Time Performance module in STA's Swiftly software program for all service days in 2022. Table 14 shows the on-time performance for every route in STA's system in 2022, as well as their minority and low-income percentage (highlighted cells indicate those figures are above the baseline figure). In 2022, only 40% of all routes met the on-time performance goal over the entire year. An additional 24% of the routes were on-time 90% of the time or better. It should be noted that 2022 was a big year for road construction projects throughout the PTBA. The delays associated with construction forced bus detours are out of STA's control. These detours can severely impact on-time performance.

Table 14. On-time performance (2022)

Route	On-Time %	Minority %	Low-income %
4	93.9%	13.9%	13.7%
6	94.7%	16.6%	22.0%
11	96.2%	19.8%	50.6%
12	97.2%	16.5%	29.7%
20	96.6%	17.5%	26.2%
21	89.6%	20.5%	27.2%
22	94.7%	13.7%	19.0%
23	91.5%	12.5%	14.3%
25	83.9%	16.3%	23.9%
26	89.8%	19.8%	29.6%
27	94.2%	16.6%	22.3%
28	89.1%	17.4%	28.0%
29	86.6%	21.2%	33.7%
32	88.0%	13.3%	14.9%
33	91.2%	17.1%	16.7%
34	87.0%	14.8%	14.9%
35	90.2%	13.6%	14.4%
36	94.9%	18.2%	25.1%
39	88.9%	18.6%	32.6%
42	95.8%	20.1%	21.2%
43	91.2%	15.5%	14.2%
45	93.9%	14.8%	21.7%
60	90.1%	20.5%	21.4%
61	89.1%	21.1%	19.1%

Route	On-Time %	Minority %	Low-income %
62	96.7%	15.7%	15.1%
63	97.6%	22.0%	10.5%
66	94.8%	17.1%	20.6%
67	91.4%	15.8%	25.5%
68	94.4%	15.8%	25.5%
74	85.2%	14.8%	15.1%
90	81.8%	16.9%	23.9%
94	88.8%	16.1%	19.6%
95	89.6%	10.9%	12.3%
96	91.9%	12.7%	13.6%
97	91.0%	10.9%	9.5%
98	91.7%	10.8%	11.1%
124	92.4%	13.4%	16.3%
144	95.2%	12.8%	12.3%
172	78.0%	14.2%	14.9%
173	91.3%	19.2%	20.9%
190	95.3%	18.2%	22.1%
223	42.9%	12.3%	12.4%
294	79.3%	15.6%	14.9%
633	97.9%	16.6%	17.0%
661	99.0%	16.8%	19.4%
662	95.4%	14.6%	15.4%
663	93.7%	16.4%	19.6%
664	88.5%	14.2%	14.2%
724	90.5%	14.2%	14.9%
771	86.8%	17.8%	20.0%

There are ongoing discussions on how to improve on-time performance when implementing future service changes.

Service Accessibility

Connect Spokane sets out an accessibility policy stating that basic or HPT service “shall be available within no more than one-half mile of at least 80% of the PTBA population residing within urban areas.” According to 2021 population estimates provided by the Washington State Office of Financial Management Small Area Estimate program, STA is currently meeting this standard. See Table 14 below.

Table 15. PTBA urban population within ½ mile of a bus stop

2021 urban population within ½ mile of an STA bus stop	362,036
2021 urban PTBA population	452,545
Percent	81%

Vehicle Assignment

STA’s vehicle assignment policy is as follows:

STA bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route such as passenger loads and overall ridership of each route. Local routes with lower ridership may be assigned a smaller fixed route vehicle. Some routes requiring tight turns on narrow streets may be operated with smaller fixed route vehicles. The age of the vehicle shall not be a consideration when assigning the vehicle to a particular maintenance garage for daily service.

(Connect Spokane Annex 2, Page 114)

The following guidelines assist in assigning vehicle equipment to the appropriate route and/or trips:

- Small 29’ – 35’ Vehicles: Operate for lower ridership routes that do not require additional capacity. Vehicles can also be used to accommodate street design in a safe and effective manner.
- Standard 40’ Vehicles: Typical fleet vehicle in use. Allows for appropriate capacity on nearly all routes.
- Articulated 60’ Vehicles: Operate along educational-focused routes (Cheney service, routes serving high schools) or corridors that warrant additional capacity. Street design must allow for larger vehicle size; however, articulated coaches generally have the same turning radius as 40’ vehicles.

All vehicle assignments are consistent with STA’s vehicle assignment policy. Vehicles are assigned to operational blocks that incorporate interlining, which means most vehicles will be used on multiple routes during the course of a service day. STA also has a policy that all coaches shall accommodate bicycles. All coaches are outfitted with a 3-bicycle rack on the front of the vehicle.

Distribution of Transit Amenities

STA's policy states that installation of transit amenities along bus routes are based on the number of passenger boardings at stops, with variances from this policy to support transfer connectivity of routes and riders with limited mobility.

Signage

STA's policy states that, "All STA bus stops shall feature signs mounted in a uniform manner to identify the area as a stop and provide readable and accurate information." STA follows this policy, and every active stop (with the exception of temporary stops) have a post indicating the physical location of the stop, with an attached sign that indicates: the agency name and logo, the route name and number, the stop number that can be used to text from cell phones to obtain real time arrival information, website address, and the number for customer service along with icons that indicate that buses accommodate bike and wheelchairs. See figure 2 below.

Figure 2. Bus Stop Sign



Benches

STA's policy is that local jurisdictions are responsible for the placement and maintenance of bus benches. Benches are provided at many stops through contracts between outdoor advertising companies and individual jurisdictions. STA makes recommendations to the jurisdictions about bench placement but does not maintain and monitor the condition. STA also does not empty trash cans from these sites.

Shelters

STA's policy is that "Stops to have shelters funded by STA must meet at least one of the following criteria:

- 25 or more weekday average boardings
- Transfer point between two or more routes
- Adjacent to a ridership generator with a high proportion of riders with limited mobility.

It is important to note that simply meeting STA policy is not a guarantee that a shelter will be constructed. In addition to funding, there must be sufficient right of way available to construct the concrete pad on which the shelter will be placed as well as a willing partner, either the local jurisdiction or a private landowner. STA does not own the property adjacent to a bus stop, in most instances, and therefore must have property owner approval before a shelter project can begin.

At the end of 2021, STA had 1,632 bus stops in service. All transit centers and park & ride lots offer passenger shelters in addition to 128 other bus stops throughout the system where ridership conditions warrant. STA operates 15 park & ride locations within the service area. Eleven are either owned or leased by STA while the remaining four are made possible by cooperative agreement. Approximately 62% of passenger boardings in 2021 occurred at a stop or facility where a shelter is provided to customers.

Stops that warrant a shelter are monitored as part of the Annual Passenger Facilities Report completed in June of every year.

Section 11 | STA Boards and Committees

Overview

In addition to the Board of Directors, STA has two committees that consist of non-elected members of the public. The duties of the Board and each committee are summarized below. Within the Title VI Circular (FTA C 4702.1B), FTA requires that STA include a table depicting the racial distribution of the members of all its non-elected committees and councils. In addition to this, STA must include a description of the process the agency uses to encourage participation of minorities on such committees.

STA Board of Directors and Committees

STA Board of Directors

The Board of Directors provides the policy and legislative direction for STA and its administrators and approves its actions, budgets and long-term plans. It also has the authority with voter approval to levy taxes as authorized by state law (RCW 36.57A). By state law, the Board is composed of nine elected officials from the jurisdictions served by the Public Transportation Benefit Area, which includes the cities of Airway Heights, Cheney, Medical Lake, Millwood, Liberty Lake, Spokane, Spokane Valley and some unincorporated portions of Spokane County. Additionally, there are four non-voting elected officials from area small cities, and one non-voting STA labor representative, for a total 14 board members.

Citizen Advisory Committee

STA's Citizen Advisory Committee (CAC) is comprised of members of the public who are residents of Spokane County. According to the committee's charter, its mission is to:

- Increase public participation in the functions of Spokane Transit.
- Ensure accountability of Spokane Transit.
- Act as an educational arm of Spokane Transit to reach out to the public.
- Act as a focused, educated forum for public input and feedback to Spokane Transit.
- Represent a wide range of stakeholders and transit service employees.

STA advertises open positions for the CAC in the *Spokesman Review* and on the STA website. The STA Board of Directors expects CAC members to educate the public about STA services as much as possible. To this end, during the membership selection process, weighted value will be given to those who are active participants in other area organizations such as non-profits. This includes organizations that serve minority populations.

City Line Steering Committee

The City Line Steering Committee provides policy-level advisory input and direction to the STA Board and to the City of Spokane staff representatives for the implementation of the City Line which also includes supportive land use and economic development policies. The membership of the committee is outlined by the joint resolution between the City of Spokane and STA. The resolution lists agencies and organizations with an interest in the City Line project that may appoint their representative.

Table 16. Non-Elected Committees Minority Composition

Committee	Minority	Non-Minority
Citizen Advisory Committee	0	12
City Line Steering Committee	0	20

Appendices

Appendix	Title
A	Downloadable Complaint Forms
B	Rider Survey Instrument
C	CBO survey instrument
D	Fare Equity Analyses
E	Service Change Equity Analysis
F	Resolution

Appendix A

Spokane Transit Title VI Complaint Form

Spokane Transit Authority (STA) does not discriminate in the provision of service on the basis of race, color, or national origin. Any person who believes STA has discriminated against him or her on the basis of race, color, or national origin may file a complaint using this form. STA does not investigate complaints received more than 180 days after the alleged incident.

For more information on STA's commitment to nondiscrimination, or to request a copy of this form in an alternative format due to a disability, contact the STA Ombudsman:

STA Ombudsman
Spokane Transit
1230 W. Boone Ave.
Spokane, WA 99201
(509) 325-6094 (TTY Relay 711)
ombudsman@spokanetransit.com

(Please Type or Print Clearly)

1. Complainant's Name _____

2. Address _____

3. City, State, Zip Code _____

4. Telephone Number: _____ Email: _____

5. Are you the Complainant? ____ Yes ____ No

If no, your name: _____

Relationship to the Complainant: _____

Phone: _____ Email: _____

Does the Complainant know you are filing this complaint? ____ Yes ____ No

6. Which of the following best describes the reason you believe the discrimination took place? Was it because of your:

a. Race

b. Color

c. National Origin

7. The date the alleged discrimination took place: _____

8. In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please use the back of this form if needed.

9. Please give the name, mailing address, and telephone number for anyone who witnessed the alleged discrimination.

10. Have you filed this complaint with any other agency or court?

Yes No

If yes, provide name, address, and phone number of contact person at the other agency/court: _____

Complainant's Signature _____ Date _____

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

Return completed form and any additional materials to:

**STA Ombudsman
Spokane Transit
1230 W. Boone Ave.
Spokane, WA 99201
ombudsman@spokanetransit.com**

Форма жалобы оператору системы общественного транспорта г. Спокан согласно раздела VI

Оператор системы общественного транспорта г. Спокан (Spokane Transit Authority, STA) не ограничивает лиц в праве на оказание услуг на основании их расовой принадлежности, цвета кожи или национального признака. Любые лица, которые полагают, что они подверглись дискриминации со стороны STA на основании расовой принадлежности, цвета кожи или национального признака, имеют право подать жалобу с помощью данной формы. STA не расследует жалобы, полученные спустя 180 дней после предполагаемого инцидента.

Для получения более подробной информации об обязательствах STA по недопущению дискриминации или запроса экземпляра данной формы в другом формате в связи с ограниченными возможностями, свяжитесь с обмудсменом STA:

STA Ombudsman
Spokane Transit
1230 W. Boone Ave.
Spokane, WA 99201
(509) 325-6094 (TTY Relay 711)
ombudsman@spokanetransit.com

(Отчетливо заполните форму печатными буквами или напечатайте текст)

1. ФИО лица, подающего жалобу _____

2. Адрес _____

3. Город, штат, почтовый индекс _____

4. Номер телефона: _____ E-mail: _____

5. Являетесь ли вы лицом, подающего жалобу? ____ Да ____ Нет

Если вы ответили отрицательно, укажите ваше ФИО: _____

Связь с лицом, подающим жалобу: _____

Номер телефона: _____ E-mail: _____

Известно ли лицу, подающему жалобу, что вы подаете настоящую жалобу?

____ Да ____ Нет

6. Что из нижеследующего наилучшим образом описывает причину, по которой вы полагаете произошел случай дискриминации

? Произошел ли он по причине:

a. Вашей расовой принадлежности

b. Вашего цвета кожи

c. Вашей национальной принадлежности

7. Дата, когда произошел случай предполагаемой дискриминации: _____

8. Опишите своими словами случай предполагаемой дискриминации. Объясните, что произошло, и кто, на ваш взгляд, нес за это ответственность. При необходимости используйте обратную сторону данной формы.

9. Укажите ФИО, почтовый адрес и номер телефона любого лица, являвшегося свидетелем случая предполагаемой дискриминации.

10. Подавали ли вы настоящую жалобу в любой другой орган или суд?

Да Нет

Если вы ответили положительно, укажите ФИО, адрес и номер телефона контактного лица в другом органе/суде:

Подпись истца _____ Дата _____

Вы можете приложить любые письменные материалы или прочую информацию, которые, на Ваш взгляд, имеют отношение к жалобе.

Заполненную форму и дополнительные материалы необходимо вернуть:

**STA Ombudsman
Spokane Transit**
1230 W. Boone Ave.
Spokane, WA 99201
(509) 325-6094 (TTY Relay 711)
ombudsman@spokanetransit.com

Formulario de denuncia, Título VI, de Spokane Transit

Spokane Transit Authority (STA) no discrimina en la prestación de servicios por motivos de raza, color o nacionalidad. Cualquier persona que crea que ha sido discriminada por STA por motivos de raza, color o nacionalidad puede presentar una denuncia mediante este formulario. STA no investigará las denuncias recibidas después de más 180 días del presunto incidente.

Para obtener más información sobre el compromiso de no discriminación de STA o solicitar una copia de este formulario en un formato alternativo por una discapacidad, comuníquese con el Defensor del pueblo de STA:

**STA Ombudsman
Spokane Transit**
1230 W. Boone Ave.
Spokane, WA 99201
(509) 325-6094 (TTY Relay 711)
ombudsman@spokanetransit.com

(Escriba claramente con letra de imprenta)

1. Nombre del denunciante _____

2. Domicilio _____

3. Ciudad, estado, código postal _____

4. Número de teléfono: _____ Correo electrónico: _____

5. ¿Es usted el denunciante? ____ Sí ____ No

Si no lo es, escriba su nombre: _____

Relación con el denunciante: _____

Teléfono: _____ Correo electrónico: _____

¿El denunciante tiene conocimiento de que está completando esta denuncia?

____ Sí ____ No

6. ¿Cuál de las siguientes opciones describe mejor el motivo del hecho de discriminación? Fue por lo siguiente:

a. Raza

b. Color

c. Nacionalidad

7. Fecha en la que sucedió el presunto hecho de discriminación: _____

8. Describa con sus propias palabras el hecho de discriminación. Explique qué sucedió y quién cree que es la persona responsable. Utilice el dorso de este formulario si es necesario.

9. Proporcione el nombre, la dirección de correo y el número de teléfono de cualquier persona que haya sido testigo del presunto hecho de discriminación.

10. ¿Ha presentado esta queja a algún otro organismo o tribunal?

Sí No

En caso afirmativo, proporcione el nombre, la dirección y el número de teléfono de la persona de contacto en el organismo o tribunal:

Firma del denunciante _____ Fecha _____

Puede adjuntar cualquier material escrito u otro tipo de información que crea relevante para la denuncia.

Envíe el formulario completo y cualquier material adicional a la siguiente dirección:

**STA Ombudsman
Spokane Transit**
1230 W. Boone Ave.
Spokane, WA 99201
ombudsman@spokanetransit.com

Mẫu Đơn Khiếu Nại theo Tiêu Đề VI của Sở Giao Thông Công Cộng Spokane

Sở Giao Thông Công Cộng Spokane (Spokane Transit Authority, STA) không phân biệt đối xử trên cơ sở chủng tộc, sắc tộc hay nguồn gốc quốc gia khi cung cấp dịch vụ. Bất kỳ người nào tin rằng STA đã phân biệt đối xử với mình trên cơ sở chủng tộc, sắc tộc hay nguồn gốc quốc gia đều có thể gửi khiếu nại bằng cách dùng biểu mẫu này. STA không điều tra các khiếu nại nhận được muộn hơn thời điểm 180 ngày kể từ ngày xảy ra sự việc được viện dẫn.

Để biết thêm thông tin về cam kết không phân biệt đối xử của STA hoặc để yêu cầu cung cấp một bản của mẫu đơn này ở định dạng khác do tình trạng khuyết tật, hãy liên hệ với Thanh Tra Viên STA:

**STA Ombudsman
Spokane Transit**
1230 W. Boone Ave.
Spokane, WA 99201
(509) 325-6094 (TTY Relay 711)
ombudsman@spokanetransit.com

(Vui Lòng Nhập hoặc Viết In Hoa Rõ Ràng)

1. Tên Người Khiếu Nại _____

2. Địa Chỉ _____

3. Thành Phố, Tiểu Bang, Mã Bưu Chính _____

4. Số Điện Thoại: _____ Email: _____

5. Quý vị có phải là Người Khiếu Nại không? ____ Có ____ Không

Nếu không, tên quý vị là: _____

Mối quan hệ với Người Khiếu Nại: _____

Số Điện Thoại: _____ Email: _____

Người Khiếu Nại có biết quý vị đang gửi khiếu nại này không?

____ Có ____ Không

6. Mục nào sau đây mô tả rõ nhất lý do quý vị tin là đã diễn ra tình trạng phân biệt đối xử? Đó là vì:

a. Chủng Tộc

b. Sắc Tộc

c. Nguồn Gốc Quốc Gia

7. Ngày xảy ra hành vi phân biệt đối xử được viện dẫn: _____

8. Hãy mô tả hành vi phân biệt đối xử được viện dẫn bằng cách diễn đạt của chính quý vị. Giải thích sự việc xảy ra và người mà quý vị cho rằng phải chịu trách nhiệm. Vui lòng sử dụng mặt sau của biểu mẫu này nếu cần.

9. Vui lòng nêu tên, địa chỉ gửi thư và số điện thoại của bất kỳ người nào đã chứng kiến hành vi phân biệt đối xử được viện dẫn.

10. Quý vị đã gửi khiếu nại này lên tòa án hay cơ quan nào khác chưa?

Rồi Chưa

Nếu rồi, hãy cung cấp tên, địa chỉ và số điện thoại của người liên hệ tại tòa án/cơ quan khác đó:

Chữ Ký Người Khiếu Nại _____ Ngày _____

Quý vị có thể gửi kèm bất kỳ tư liệu văn bản hay thông tin nào khác mà quý vị cho là có liên quan đến khiếu nại của mình.

Gửi lại biểu mẫu đã hoàn thành và mọi tài liệu bổ sung về:

**STA Ombudsman
Spokane Transit**
1230 W. Boone Ave.
Spokane, WA 99201
ombudsman@spokanetransit.com

Appendix B

Introduction

* 1. Do you have a flyer from STA regarding the 2022 Title VI Rider Survey?

Yes

No

Flyer Color

* 2. Please identify the flyer's color

- Yellow
- Blue
- White
- Pink / Salmon
- Purple / Lilac
- Green

TRIP DETAILS

* 3. Tell us what bus route you were riding when you received the flyer. If you did not receive a flyer, tell us what bus route you were most recently riding.

4. Where did your bus trip start?

- Home
- Work
- School
- Errands (shopping, medical appointments, groceries, etc)
- Visiting family or friends, sports events, parks, libraries, etc
- Other (please tell us more)

5. How did you get to the bus stop?

- Walked
- Biked
- Scooter
- Drove alone
- Rode in a car with someone else
- Dropped off at stop
- Transferred from other route (please identify)

6. Where were you going on that trip?

- Home
- Work
- Errands (shopping, medical appointments, groceries, etc)
- Visiting family or friends, sports event, parks, libraries, etc
- Other (please tell us more)

7. After you got off the bus, how did you get to where you were going?

- Walked
- Biked
- Scootered
- Rode in a car with someone else
- Got on another bus (please tell us the Route)

HOW YOU PAY FOR TRANSIT

* 8. Did you use the new Connect fare system to pay for that trip?

Yes

No

HISTORICAL FARE SYSTEM

* 9. What fare type did you use for this trip?

CONNECT CARD

* 10. Did you use a Connect Card or the app?

- Connect card
- Connect App

* 11. What fare type did you use for this trip?

- One ride
- 7-day rolling pass
- Zero Fare Youth Pass
- Reduced Fare: Honored Rider (60 & over)
- Reduced Fare: Stars & Stripes (Veterans)
- Reduced Fare: Disability
- Reduced Fare: Student

ABOUT YOU

* 12. How do you self-identify by race?

- White or Caucasian
- Black or African American
- Asian or Asian American
- American Indian or Alaska Native
- Native Hawaiian or other Pacific Islander
- Two or more races
- Prefer not to say

* 13. Gender (select all that apply)

- Woman
- Man
- Non-binary
- Prefer to self-describe

- Prefer not to say

14. What is your age?

- Under 18
- 18-24
- 25-34
- 35-44
- 45-54
- 55-64
- 65+

* 15. What is the primary language spoken in the household?

- English
- Spanish
- Vietnamese
- Russian
- Chinese
- German
- Korean
- Other (please specify)

* 16. How would you describe your ability to speak English?

- Very Well
- Well
- Not Well
- Not at all

* 17. How many people are in your household (including yourself)?

* 18. What is your current (annual) household income range? (best guess is okay)

To enter the drawing for one of 15 7-day passes, please follow the link below to submit contact information. The contact information is NOT linked to survey responses.

[Drawing Entry](#)

Appendix C

Introduction

As part of Spokane Transit's Title VI Nondiscrimination Program, we are requesting providers who serve low-income, minority, and limited English proficiency clients to complete a short demographic questionnaire. The information collected will be used to update our Title VI Program.

1. Please tell us about yourself and your organization

Name

Title

Organization

Email

Minority and LEP Populations

2. Does your organization work with minority groups and/or limited English proficiency clients?

- Yes
- No

Minority and LEP Populations

3. About how many clients do you serve per month?

- 0 - 9
- 10 - 20
- 21 - 50
- 51 - 100
- 100+

4. Please estimate how many clients per month are limited in their ability to speak English

- 0 - 9
- 10 - 20
- 21 - 50
- 51 - 100
- 100+

5. About how many clients of each language do you serve per month?

	0 - 9	10 - 20	21 - 50	51 - 100	100+
Spanish	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Russian	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Vietnamese	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Arabic	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Bosnian	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Burmese	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Chinese	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Farsi	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
French	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Greek	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Hmong	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Kinyarwanda	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Kirundi	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Korean	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Marshallese	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Moldovan	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Nepali	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Russian	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Somali	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Swahili	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Thai	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ukrainian	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other (please specify)

6. Do the limited English-speaking individuals that you serve rely on transit service?

Yes

No

7. What locations in the Spokane area do they most frequently travel to and from?

- NE Spokane
- NW Spokane
- South Spokane
- Downtown Spokane
- Spokane Valley
- Liberty Lake
- Medical Lake
- Cheney
- Other (please specify)

Low-Income Populations

8. Does your organization work with low-income clients?

Yes

No

Low-Income Populations

9. About how many clients do you serve per month?

- 0 - 9
- 10 - 20
- 21 - 50
- 51 - 100
- 100+

10. Please estimate how many clients per month identify as low-income?

- 0 - 9
- 10 - 20
- 21 - 50
- 51 - 100
- 100+

11. Do the low-income individuals that you serve rely on transit service?

- Yes
- No

12. What locations in the Spokane area do they most frequently travel to and from?

- NE Spokane
- NW Spokane
- South Spokane
- Downtown Spokane
- Spokane Valley
- Liberty Lake
- Medical Lake
- Cheney
- Other (please specify)

Wrap-Up

13. How important is transit to your clients?

- Extremely important
- Very important
- Somewhat important
- Not so important
- Not at all important

14. What are the best ways to communicate with your clients?

- Email
- Website
- Social media
- Newspaper / newsletter
- Radio stations
- Word of mouth
- On bus communications (signs, handouts, etc)
- Through service providers such as your organization
- Other (please specify)

15. How can STA best engage the people you serve to provide input in our planning efforts and provide feedback on proposed fare or service changes? Is there anything else you would like us to know?

Appendix D

RESOLUTION NO. **791-22**

A RESOLUTION FOR THE PURPOSE OF ADOPTING THE SPOKANE TRANSIT AUTHORITY TARIFF POLICY AND PROCEDURES FOR FIXED ROUTE, PARATRANSIT AND VANPOOL; RESCINDING RESOLUTION NUMBER 779-19; AND OTHER MATTERS RELATED THERETO.

SPOKANE TRANSIT AUTHORITY

Spokane County, Washington

BE IT RESOLVED BY THE SPOKANE TRANSIT AUTHORITY as follows:

WHEREAS, the Spokane Transit Authority (STA) is a municipal corporation operating and existing under and pursuant to the Constitution and the laws of the state of Washington, pursuant to RCW Title 36, Chapter 57.A, Public Transportation Benefit Area; and

WHEREAS, on September 19, 2019, the STA Board of Directors adopted Resolution No. 779-19, approving the current STA Tariff Policy, inclusive of the Special Event Fares; and

WHEREAS, on July 16, 2020, the STA Board of Directors adopted Resolution No. 778-20, approving the current STA Vanpool Fare Policy; and

WHEREAS, the STA Board of Directors desires to update its Tariff Policy and rescind Resolutions No. 779-19 and 778-20.

WHEREAS, STA has conducted extensive public outreach to provide awareness and receive input on proposed updates to its Tariff Policy; and

WHEREAS, STA has conducted an equity analysis of the fare policy changes resulting from an update to its Tariff Policy pursuant to Title VI of the Civil Rights Act, guidance promulgated by the Federal Transit Administration, related policies within *Connect Spokane* and STA's 2020 Title VI Plan; and

WHEREAS, STA finds that the fare policy changes do not pose a disparate impact or disproportionate burden on populations identified in the above-referenced statutes, guidance and policies.

NOW, THEREFORE BE IT RESOLVED by the STA Board of Directors as follows:

Section 1. The STA Board of Directors hereby adopts and establishes the rates, tolls, and fares identified in the Fixed Route and Paratransit Fares, Vanpool Fares, and Special Event Fares (effective with fare collection system implementation), a copy of which is attached hereto and incorporated herein as "Exhibit A."

Section 2. Resolution No. 779-19, and all amendments thereto, is hereby revoked, rescinded, and superseded by this Resolution as of its effective date.

Section 3. Resolution No. 778-20, and all amendments thereto, is hereby revoked, rescinded, and superseded by this Resolution as of its effective date.

Section 4. This Resolution shall become effective upon its date of adoption and shall remain in full force and in effect until revised by Board resolution; provided, the Chief Executive Officer is hereby authorized to implement the effective date of the rates, tolls, and fares identified in Exhibit A as "Fixed Route and Paratransit Fares (effective with fare collection system implementation)" at such date in the future when the new account-based fare collection system is put in service for use by STA patrons.

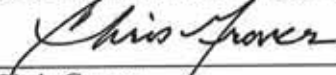
ADOPTED by STA at a regular meeting thereof held on the 21st day of January 2022.

ATTEST:



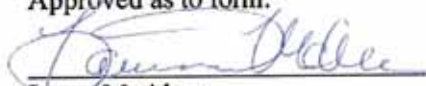
Dana Infalt
Clerk of the Authority

SPOKANE TRANSIT AUTHORITY:



Chris Grover
Board Chair

Approved as to form:



Laura McAloon
Legal Counsel

Exhibit A

Fixed Route and Paratransit Fares (currently in effect)

GENERAL PUBLIC Fare Type	Adult (1)	Reduced Fare (2)			Paratransit (3)
		Youth (Ages 6-18)	Student	Reduced Fare	
Two-Hour Pass / Cash	\$ 2.00	\$ 2.00	\$ 2.00	\$ 1.00	\$ 2.00
Day Pass	\$ 4.00	\$ 4.00	\$ 4.00	\$ 4.00	N/A
7-day Rolling Pass	\$ 17.00	\$ 17.00	\$ 17.00	\$ 17.00	N/A
31-day Rolling Pass	\$ 60.00	\$ 40.00	N/A	\$ 30.00	N/A
Monthly Pass (4)	N/A	N/A	\$ 52.00	N/A	N/A
Paratransit Monthly Pass	N/A	N/A	N/A	N/A	\$ 60.00
Summer Youth Pass (5)	N/A	\$ 60.00	N/A	N/A	N/A
Shuttle Park (6)	\$ 40.00	N/A	N/A	N/A	N/A

(1) Up to three children under age six ride free with an adult, youth, student, reduced fare or paratransit passenger - children under age six are not permitted to ride unaccompanied

(2) Reduced Fare programs require verification of eligibility.

(3) Personal Care Assistant (PCA) rides free on Paratransit or Fixed Route with paid paratransit rider (needs no identification, however, the person with whom they are traveling must have "PCA" on their ADA paratransit identification card)

(4) Monthly Student Pass is priced as a 31-day adult pass with discount applied, subject to enrollment and verification by STA in accredited educational program

(5) Three-month youth pass valid June through August (*approved at no cost to rider through 2023*)

(6) Includes parking at a designated parking lot, as stipulated in the Shuttle Park pass agreement

Exhibit A

Fixed Route and Paratransit Fares (effective with fare collection system implementation)

GENERAL PUBLIC Fare Type	Standard Fare (1)	Reduced Fare (2)					Paratransit (3)
		Rider-In-Training (Ages 6-12)	Rider's License (Ages 13-18)	Student	Honored Rider	Stars & Stripes	
One Ride (4)	\$ 2.00	Free	\$ 1.00	\$ 2.00	\$ 1.00	\$ 1.00	\$ 2.00
Farecapping - Daily (5)	\$ 4.00	N/A	\$ 2.00	\$ 4.00	\$ 2.00	\$ 2.00	\$ 4.00
Farecapping - Monthly (6)	\$ 60.00	N/A	\$ 30.00	\$ 48.00	\$ 30.00	\$ 30.00	\$ 60.00
7-day Rolling Pass	\$ 17.00	N/A	N/A	N/A	N/A	N/A	N/A
Summer Youth Pass (7)	N/A	N/A	\$ 60.00	N/A	N/A	N/A	N/A
Shuttle Park (8)	\$ 40.00	N/A	N/A	N/A	N/A	N/A	N/A

GROUP SALES (9) Fare Type	Standard Fare (1)	Reduced Fare (2)	Paratransit (3)
Two-Hour Pass	\$ 2.00	\$ 1.00	\$ 2.00
Day Pass	\$ 4.00	\$ 2.00	\$ 4.00
7-day Rolling Pass	\$ 17.00	N/A	N/A
Monthly Pass	N/A	N/A	\$ 60.00
31-day Rolling Pass	\$ 60.00	\$ 30.00	N/A

(1) Up to three children under age six ride free with an adult, youth, student, reduced fare or paratransit passenger - children under age six are not permitted to ride unaccompanied

(2) Reduced Fare programs require verification of eligibility.

(3) Personal Care Assistant (PCA) rides free on Paratransit or Fixed Route with paid paratransit rider (needs no identification, however, the person with whom they are traveling must have "PCA" on their ADA paratransit identification card)

(4) Allows for travel up to two (2) consecutive hours after initial validation

(5) Maximum fare charged per day when paid with a smart card or mobile app

(6) Maximum fare charged per calendar month when paid with a smart card or mobile app

(7) Three-month youth pass valid June through August (approved at no cost to rider through 2023)

(8) Includes parking at a designated parking lot, as stipulated in the Shuttle Park agreement

(9) Limited use fare types available for quantity purchases only and not available to the general public

Vanpool Fares (*currently in effect, no planned revision*)

	Monthly Fare	
Zone 1 - Spokane County	\$	60.00
Zone 2 - Stevens/Kootenai County	\$	80.00
Zone 3 - All Others	\$	100.00

Note: The origin or destination of any vanpool must be in the Public Transportation Benefit Area

Exhibit A

Special Event Fares (currently in effect, no planned revision)

All Special Event service is open to the public and serves pre-designated stops.

Event	Daily Rate	Specifications
Bloomsday	\$ 2.00	Pre-purchased Single Day Pass sticker valid on day of event.
Hoopfest	\$ 2.00	Single Day Pass valid on any day of the event.
Spokane County Fair	\$ 2.00	Single Day Pass valid on any day of the fair.
Valleyfest	\$ 0.00	Service between Spokane Valley Mall, CenterPlace and Mirabeau Meadows Park valid on dates of the event.

Note: Special Event Fares do not apply toward fare capping when implemented.

Title VI Equity Analysis

Proposed Fare Policy Revisions

Final

1/20/2022



Spokane Transit assures nondiscrimination in accordance with Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act. For more information, see www.spokanetransit.com. Upon request, alternative formats of this information will be produced for people who are disabled. Please call (509) 325-6094 (TTY Relay 711) or email ombudsman@spokanetransit.com.

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Section I: Introduction

As Spokane Transit Authority (STA) advances *STA Moving Forward*, the 10-year plan for more and better transit services in the region, it is implementing a modernized fare collection system, which will provide new benefits and greater convenience for riders. These benefits are further described in the proposed fare policy revisions which introduces an account-based system with durable fare cards and a mobile ticketing application.

This report documents STA's Title VI equity analysis of the proposed fare policy revisions which will guide implementation of the fare collection system in 2022. Upon completion of this fare equity analysis, staff shall brief the Board of Directors prior to the Board's action(s). STA will keep this analysis on file and available for review by the Federal Transit Administration (FTA) and the general public.

The fare equity analysis was performed in accordance with the requirements specified in the Federal Transit Administration (FTA), Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients and STA's 2020 Title VI Program and the policies outlined in STA's Comprehensive Plan, *Connect Spokane, A Comprehensive Plan for Public Transportation*.

Fare Policy Revisions Objectives and Overview

The objectives of the revisions are to incorporate new fare types enabled by the new fare collection system and broaden discount programs to encourage ridership and to enhance access and equity. The fare policy revisions have three major components:

- **Fare Media:** Introduce an account-based fare collection system with a card and mobile ticketing application as the primary (non-cash) fare media
- **Fare Capping:** Provide daily and monthly fare caps enabled through the use of smart cards or mobile ticketing application (mobile app)
- **Discount Programs:** Provide more discount options to a broader population of riders

Spokane Transit Authority (STA)

Description of Fleet and Services

Spokane Transit Authority is a regional public transportation agency providing a variety of transportation services, including fixed-route, Paratransit, and Vanpool service. In 2019¹ Spokane Transit's fixed route system provided 9,971,798 unlinked passenger trips and traveled 6,118,526 revenue miles. Paratransit provided 441,097 passenger trips and traveled 2,393,647 revenue miles. Vanpool provided 155,262 passenger trips and traveled 929,850 revenue miles.

¹ Spokane Transit is providing 2019 NTD and fixed route service and maintenance data (unless otherwise noted) which is the last full year of reporting prior to COVID-19

STA's 2020 fleet includes 147 active fixed route coaches, 70 active Paratransit vans and 96 active vanpool vans. Fixed Route Bus Service operates 43 routes, 365 days a year. In accordance with the Americans with Disabilities Act (ADA), all vehicles are lift or ramp equipped.

Paratransit Service is operated by STA and its contractor for people who qualify under the eligibility requirements of the ADA. Paratransit service is provided within a defined service area, during the same hours and days as fixed route service and in compliance with applicable state and federal laws for service to people whose disability prevents them from using Fixed Route bus service. The directly operated Paratransit fleet is comprised of 70 vehicles, each with a capacity for up to 15 passengers. Contracted transportation supplements service during the early mornings, nights and weekends as well as augments capacity during weekdays.

Vanpool (Rideshare) Service augments STA's public transportation system through the assignment of passenger vans to vanpool groups. A vanpool group can be formed by a group of five to 15 people whose origin or destination is within the STA service area.

Areas Served

Areas served include cities of Airway Heights, Cheney, Liberty Lake, Medical Lake, Millwood, Spokane, and Spokane Valley and some unincorporated areas of Spokane County. Services include connections between downtown Spokane and the Spokane International Airport, major shopping malls, area colleges and universities, and Fairchild Air Force Base. Spokane Transit Authority (STA) operates within the designated Public Transportation Benefit Area (PTBA) which encompasses approximately 248 square miles of Spokane County which includes approximately 459,007 residents or 84.8 percent of the county population.

STA's Title VI Policy Development

Title VI of the Civil Rights Act of 1964 (Title VI) requires public transportation providers that receive federal funds to operate services and programs in a non-discriminatory manner. Race, color, and national origin are protected classes under Title VI. Low-income populations are not a protected class under Title VI; however, the FTA requires transit providers to evaluate the impacts of any fare changes on low-income populations as well.

STA's Fare Change Minority Disparate Impact Policy and Fare Change Low-Income Disproportionate Impact Policy were developed with an extensive public outreach effort. Letters were sent to a wide range of Limited English Proficiency (LEP) and nonprofit organizations as well as community centers and government agencies in early 2013 and early 2014. A public hearing was held to gather public comments. The 2014 Title VI update and policies were adopted by the Spokane Transit Board of Directors in early 2014. These policies continue to serve the agency and were incorporated into the 2019 *Connect Spokane* update and the 2020 Title VI Plan.

Section II. Proposed Fare Policy

STA periodically evaluates its fare policy and fare structure. The last major review of the fare structure was conducted in 2016 and led to a fare increase. These policy revisions are not proposing tariff revisions, rather they are being undertaken in anticipation of the implementation of STA’s new fare collection system.

Spokane Transit is implementing a new account-based fare collection system that offers smart card and mobile ticketing capabilities to enhance rider access and experience across its network. Through the new system, customers will have increased convenience through electronic fare payment and self-service account management capabilities, while also improving transit system performance by enabling pre-payment of fares and all-door boarding to reduce dwell time.

Fare Policy Revisions Overview

The fare policy revision has three major components:

- **Fare Media:** Introduce an account-based fare collection system with a card and mobile ticketing application as the primary, non-cash, fare media
- **Fare Capping:** Provide daily and monthly fare caps enabled through the use of smart cards or mobile ticketing application
- **Discount Programs:** Provide more discount options to a broader population of riders

Fare Media

Fare media smart cards and the mobile app, both of which will serve as front end devices for the account-based system, will become the primary fare media used to access the STA system beginning in Fall 2022. The account-based system and fare policies will eliminate the need for daily, 7-day rolling, and 31-day rolling passes. The account-based system will provide for daily and/or monthly fare capping. A description of each fare media type is shown in Table II-1 below.

Table II-1. Current and Proposed Fare Media Types

Fare Media	Description	Current	With Fare Collection System Implementation
Cash	Exact fare required in cash or coin – no change will be given and pennies are not accepted	✓	✓
Magnetic Stripe Card	Magnetic Stripe Cards are read by making the appropriate contact between the card and the farebox card reader. Paratransit van operators may record fare use of the card for the paratransit rider as needed.	✓	
Connect Card	Connect Cards are chip-embedded cards holding data that allows a vast array of potential fare opportunities. The first Connect Card for a customer will be provided free of charge. Replacement card fees will be based on STA’s cost to provide the cards. Connect Cards can also serve as an identity card (by adding a photo and other basic information). Connect Cards can be reloaded with additional value or time and reused indefinitely. The card is read by passing the card near or “within proximity” of the validator hardware.	✓	✓
Institutional Card	Combination ID/Smart Card issued to participants in current STA pass programs	✓	
Mobile App	Manage your fare account or pay with your virtual Connect Card through the STA mobile app.		✓
Limited Use Ticket	Paper RFID ticket that can be read by holding near the fare validator hardware. Available through Group sales only.		✓
Barcoded Paper Ticket	Paper barcoded ticket issued by a Ticket Vending Machine.	✓	✓
Contactless Credit Card	Discover, Mastercard and Visa contactless credit cards read by passing the card near or “within proximity” of the validator hardware.		✓
NFC-based Payments	NFC-based payments such as Apple Pay and GooglePay on a mobile phone can be read by passing the device near or “within proximity” of the validator hardware.		✓

Account-Based Fare Media

The proposed, modernized fare collection system will be account-based. Account-based systems store value in an individualized account; but the fare media only contains credentialing information that enables the fare system to draw from the appropriate account. While all fare media are linked to an account in the fare collection system, meeting STA’s data security policies, STA will categorize fare media as either “registered” or “unregistered”, with additional benefits available to registered media.

Accessing Smart Card Benefits

Customers will be able to reload funds onto their account at multiple locations, including partner retail locations. All funds added to an account will be available for use on all fare media tied to the customer’s account. Funds can be re-loaded onto customer accounts using a fare media smart card at the STA Plaza, partner retail locations, or online. The mobile app can also be used as a device to re-load customer accounts.

Fare Capping

STA is introducing fare capping. Fare capping limits the total amount of money users are charged for rides taken within a specific period; additional rides within that period are free of charge. This new fare policy is intended to promote transit ridership and enhance the customer experience.

Daily and monthly fare capping will be applied to unregistered and registered accounts. Only trips that reduce the amount of value in an account, not free transfers, will count towards the daily and monthly fare cap; these are also known as “charged trips”. Fare capping will apply across all STA services, except Vanpool which is a monthly program only.

For the purposes of the policy, a day is defined as the first run of the day to the last run of the day based on STA’s then in effect schedules by route. The daily fare cap triggers after \$4.00 of charged trips (2 paid trips). Trips taken during the free transfer window (within two hours after the charged trip) will not count towards the cap or deduct money from the account. The month will be defined as the calendar month. Table II-2 compares existing policy versus the proposed policy.

Table II-2. Fare Capping – Existing Policy versus Proposed Policy

	Fare Cap	Regular Service	Paratransit	Reduced Fare Discount Programs
Existing Fare Capping	Daily	None	None	None
	Monthly	None	None	None
Proposed Fare Capping	Daily	\$4.00	\$4.00	\$2.00
	Monthly	\$60.00	\$60.00	\$30.00

Reduced Fare Discount Programs

STA is proposing to expand the current discount programs that are offered by the agency. Table II-3 below identifies the current and proposed reduced fare discount programs (including an eligibility description for each).

Table II-3. Expanded Reduced Fare Discount Programs

Program Title	Program Description	Current	With Fare Collection System Implementation
Honored Rider	A Fixed Route reduced fare (50%) program available to customers who are: 1) 60 years of age or older; or 2) have a qualifying disability; or 3) have a valid Medicare card issued by the Social Security Administration. An STA-provided reduced fare or paratransit identification card must be shown to the bus operator each time the bus is boarded and the reduced fare paid.	✓ <i>(currently 65 years or older)</i>	✓
Stars and Stripes	A Fixed Route reduced fare (50%) program open to veterans, reserve, and active-duty military with proof of status <ul style="list-style-type: none"> o Active-duty military ID card o VA ID card o DD214 o Driver's license with Veteran designation 		✓
Rider's License	A Fixed Route reduced fare program (50%) available to youth customers (13-18 years of age) when presenting an STA issued pass.		✓
Rider-In-Training	A Fixed Route reduced fare program (100%) available to youth customers (6-12 years of age) when presenting an STA issued pass.		✓
Student	A Fixed Route reduced fare program available to students enrolled in post-secondary education at a technical or job/career training institution. Students who possess valid proof of enrollment in a registered institution are eligible for a discount of 20% off the standard monthly fare cap. Eligible educational and training institutions are either: qualified providers of federal financial aid and have obtained a Federal School Code; or have obtained a vocational school license issued by the Washington State Workforce Training and Education Coordinating Board.	✓ <i>(currently 31-day pass w/discount)</i>	✓

All other existing reduced fare discount programs (such as the Community Access Program) will continue to operate in the same form as previously.

Section III. Fare Equity Analysis

Title VI of the Civil Rights Act of 1964 requires public transportation providers that receive federal funds to operate services and programs in a non-discriminatory manner. Race, color, and national origin are protected classes under Title VI.

To fulfill the requirements of Executive Order 12898 and DOT Order 5610.2(a) on Environmental Justice, FTA requires that an impact analysis be conducted to identify any disproportionate burdens to low-income populations that would occur as a result of a major service or fare change. Low-income populations are not a protected class under Title VI. However, Chapter IV-18 of the Title VI Circular states that “transit providers should take steps to minimize or mitigate impacts (for this population) where practical. The provider should also describe alternatives available to low-income passengers affected by service changes.”

STA’s Title VI policy, adopted in early 2014, identifies how STA assesses disparate impact and disproportionate burden that could potentially result from changes to fare policy.

Minority Disparate Impact Policy

If a fare change affects fare categories or payment methods used disproportionately by minority populations (10% or greater than the overall population), a fare change disparate impact exists and the impacts will be assessed and evaluated for mitigation.

Low-Income Disproportionate Impact Policy

If a fare change affects fare categories or payment methods used disproportionately by low-income populations (10% or greater than the overall population), a fare change disproportionate burden exists and the impacts will be assessed and evaluated for mitigation.

The analysis methodology is contained in Appendix A: Fare Equity Methodology. An overview of the proposal, and the results of the analysis, follows.

Overview of Major Fare Policy Revisions

The fare policy revisions contains three major components:

- **Fare Media:** Introducing an account-based fare collection system with a card and mobile ticketing application as the primary, non-cash, fare media
- **Fare Capping:** Provides daily and monthly fare caps enabled through the use of smart cards or mobile ticketing application
- **Discount Programs:** Provides more discount options to a broader population of riders

Major Fare Policy Revisions Analysis

Fare Media

STA is introducing an account-based fare collection system with a smart card and mobile ticketing application as the primary, non-cash, fare media. Because use of the account-based system is a prerequisite to access some of the benefits offered by the new system, STA wanted to know the answers to two questions:

1. How does the use of various fare payment types compare among various populations? and
2. How does the access to existing and proposed vendor locations where the fare media will be available for purchase and reloading compare?

Fare Payment Types Analysis

Using data collected for the 2020 Title VI Rider Survey, Tables III-1 and III-2 list the fare payment use type by (a) minority households and (b) low-income households compared to the overall population use for those fare payment types. (Responses marked “prefer not to say” for self-identifying race were excluded from the analysis in Table III 1).

Table III-1: Fare Payment by Minority Households as Compared to Total Households

Fare Medium	Minority HHs % Use	Overall Population % Use	Title VI Threshold	Disparate Impact (DI)
CASH	36.7%	41.0%	45.1%	NO
PASS	36.7%	31.1%	34.2%	NO
SMART CARD	25.0%	22.3%	24.5%	NO
STUDENT ID	0%	0.8%	0.8%	NO
No Response	1.5%	4.9%	5.4%	NO
Total	100%	100%	-	-

Table III-2: Fare Payment Type Use by Low-Income Households as Compared to Total Households

Fare Medium	Low-Income HHs % Use	Overall Population % Use	Title VI Threshold	Disproportionate Burden (DB)
CASH	40.0%	41.1%	45.2%	NO
PASS	34.7%	31.6%	34.6%	NO
SMART CARD	21.3%	23.3%	25.6%	NO
STUDENT ID	0.8%	1.2%	1.3%	NO
No Response	3.1%	2.8%	3.0%	NO
Total	100%	100%	-	-

Fare Payment Type Analysis Results

Using survey data collected in the 2020 Title VI Rider survey, STA determined that minority riders use passes and smart cards at a slightly higher rate compared to the overall population, while low-income riders use passes at a slightly higher rate compared to the overall population.

Vendor Access Analysis

The next step for STA was to analyze vendor access to determine if there is a disparate impact or disproportionate burden on Title VI populations. Because use of the account-based system is a prerequisite to access some of the fare policy benefits, STA analyzed access to proposed locations where the fare media will be available for purchase and where cash may be used to load funds to riders’ smart cards.

Access to transit and transit amenities can be determined by measuring the estimated distance a rider would walk to the route or amenity. STA regularly uses ½ mile as the standard walking range for its users. For the purposes of this Title VI analysis, a buffer area of ½ mile will be applied around all STA routes (September 2021 network) for population analysis, as well as the existing and proposed vendor locations. See Appendix A for a full methodology.

The account-based fare media available at vendor locations requires different technologies than STA’s existing fare media. As such, STA is working with InComm, a global company with a network of partner retail locations providing smart card technology compatible with the new STA fare collection system, to identify potential vendor locations in the STA service area. STA is also intending to negotiate with the existing retail network to support the sale of smart cards and loading of funds.

Table III-3 shows the vendor access analysis results. STA intends to do additional vendor access analysis once the specific vendors have been identified to corroborate the results found in Table III-3.

Table III-3: Vendor Access Results

	Service Area Population	Current Access	% w/ Current Access	Future Access	% w/ Future Access	Change in Access	Title VI Threshold	DI/DB
Overall	323,953	63,354	19.6%	150,506	46.5%	137.6%	156.6%	NO
Minority	63,808	12,962	20.3%	31,411	49.2%	142.3%		
Low-Income	51,193	11,371	22.2%	26,654	52.1%	134.4%	147.8%	NO

Figures III-1 through Figure III-4 illustrate the distribution of the existing and proposed vendor locations as related to the density of impacted populations (persons/acre), as well as the access area (1/2-mile radius) for those vendor locations.

Figure III-1: Map of Existing Vendor Locations – Minority Density

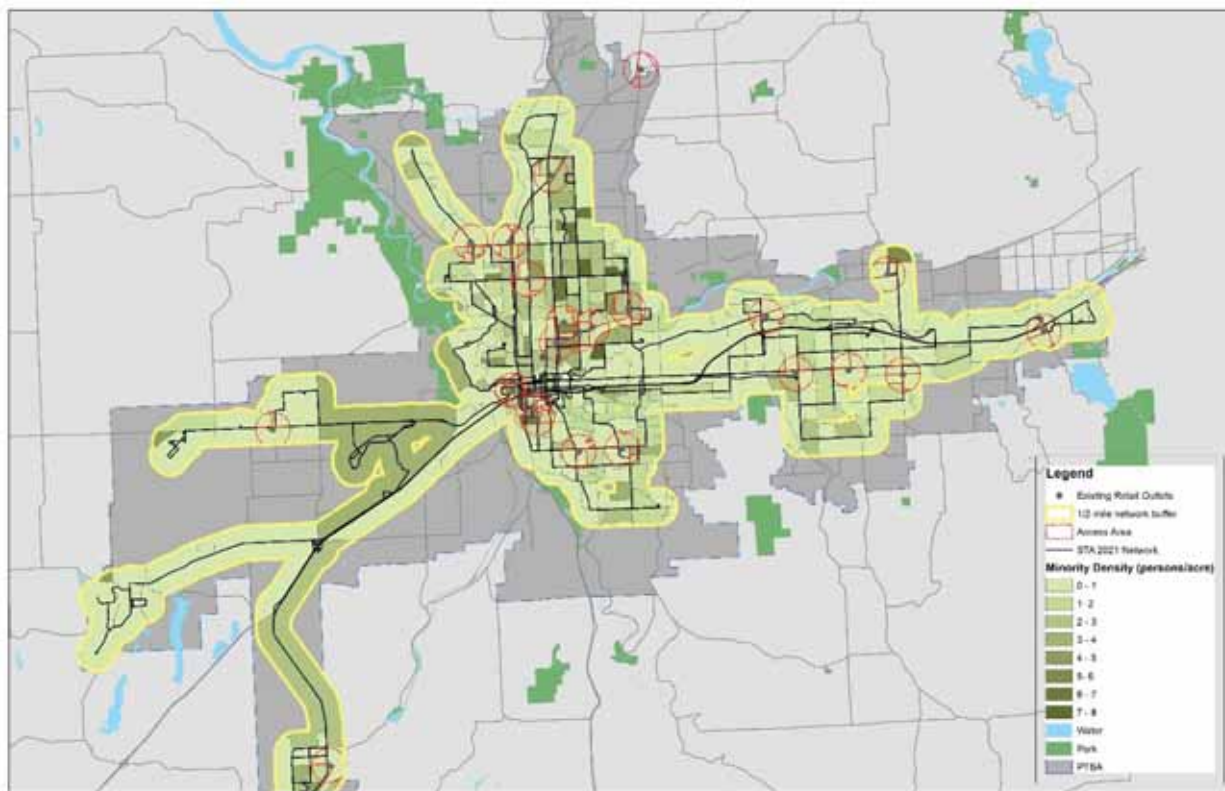


Figure III-2: Map of Existing Vendor Locations – Poverty Density

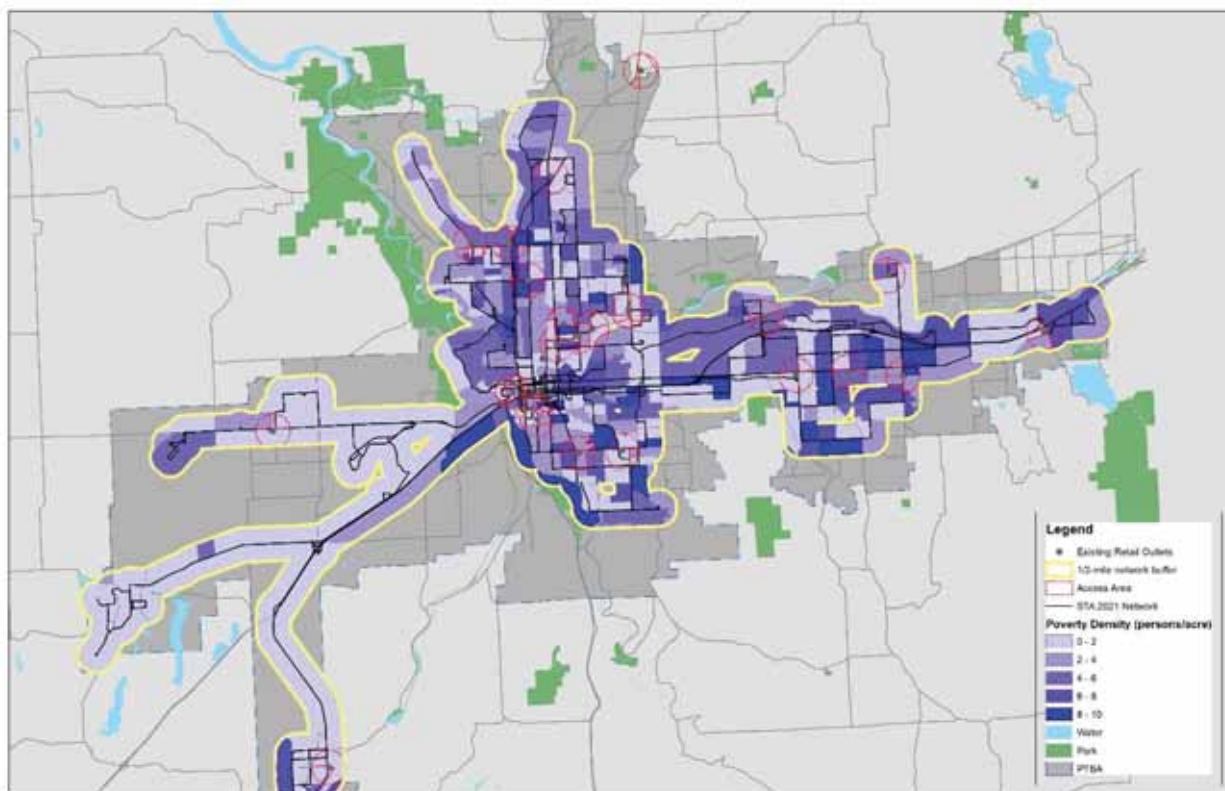


Figure III-3: Map of Proposed Vendor Locations – Minority Density

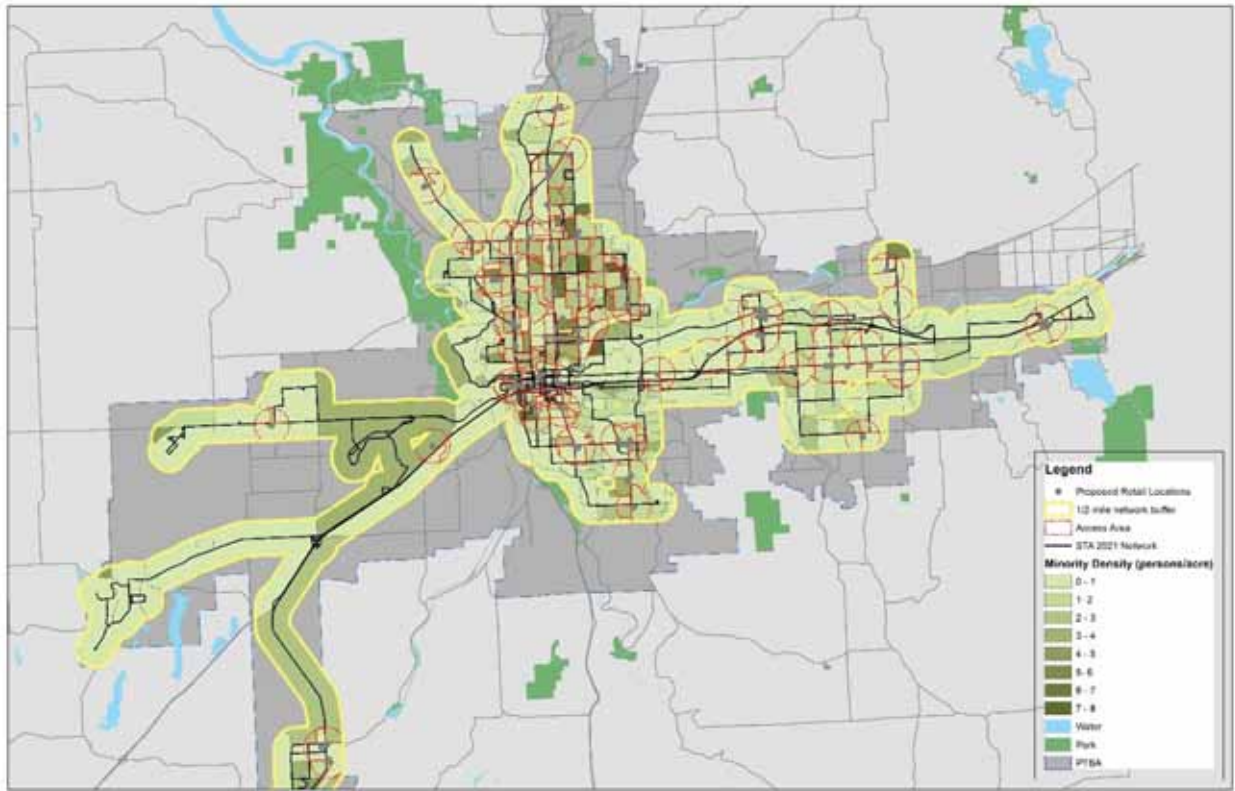
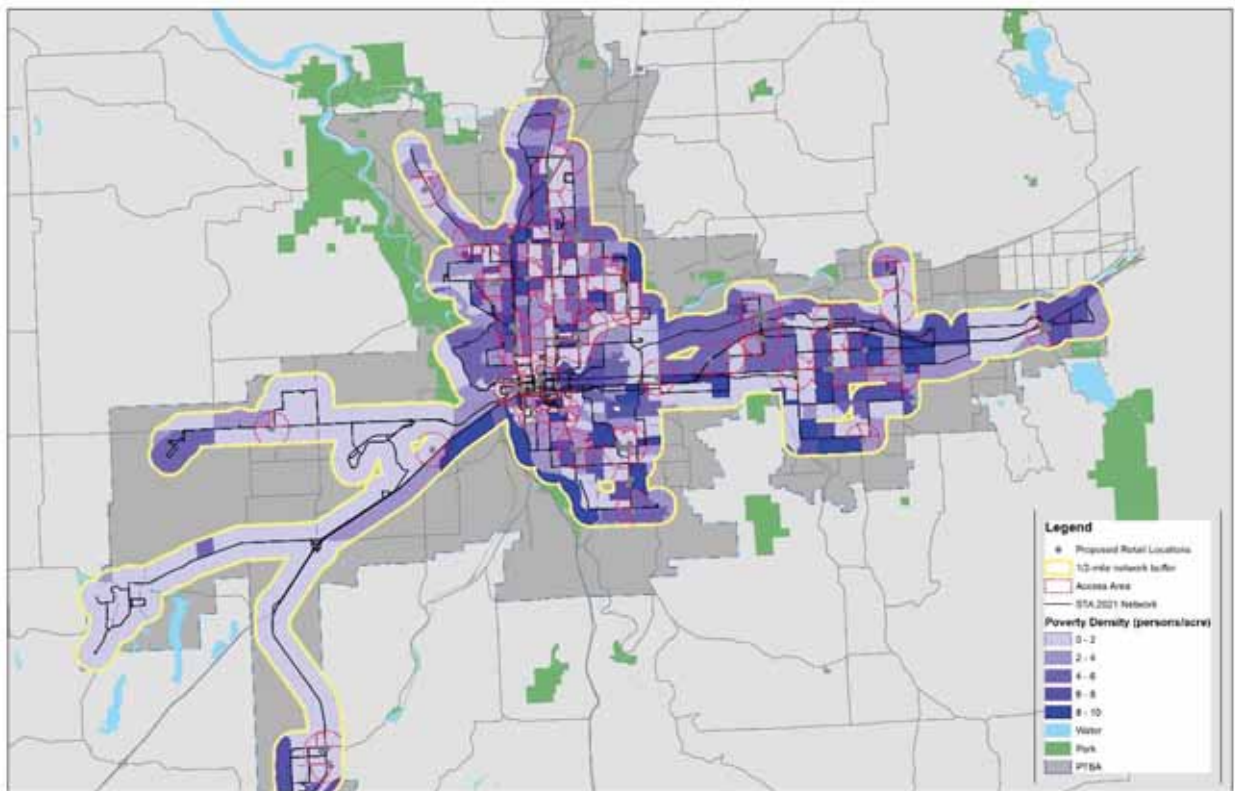


Figure III-4: Map of Proposed Vendor Locations – Poverty Density



Fare Capping

Fare capping allows users to capture the benefit of an unlimited time-period pass (e.g., 31-day rolling pass) without facing the burden of the upfront cost of those passes. At present, purchasing a period pass may be cost-prohibitive to low-income riders who would benefit from having access to those passes.

Fare capping rewards frequent use of the system and limits the amount an individual spends on transit during the designated period. Fare capping serves as an equitable alternative to a period pass by enabling riders to “spend toward” a period pass. Under the fare capping proposal, 2 or more charged trips within the transit day will cap at, i.e., cost no more than, \$4.00; 30 or more charged trips within the transit month will cap at, i.e. cost no more than, \$60.00. Riders may load funds incrementally throughout the month while accruing toward the fare cap.

To analyze the costs and benefits of fare capping within this fare equity analysis, a robust analysis is dependent upon fare media, trip frequency, and trip characteristics. While STA did not collect sufficient trip information in the 2020 Title VI Rider Survey that was used to conduct the preliminary Title VI Fare Policy Analysis of disparate and disproportionate impact to conduct an in-depth analysis, a review of fare payment method (Tables III-4 and III-5) provides insight.

Table III-4: Pass & Smart Card Payment by Minority Households as Compared to Total Households

Fare Medium	Minority HHs % Use	Overall Population % Use	Title VI Threshold	DI
CASH	36.7%	41.0%	45.1%	NO
PASS	36.7%	31.1%	34.2%	NO
SMART CARD	25.0%	22.3%	24.5%	NO
STUDENT ID	0%	0.8%	0.8%	NO
No Response	1.5%	4.9%	5.4%	NO
Total	100%	100%	-	-

Table III-5: Pass & Smart Card Payment by Low-Income Households as Compared to Total Households

Fare Medium	Low-Income HHs % Use	Overall Population % Use	Title VI Threshold	DB
CASH	40.0%	41.1%	45.2%	NO
PASS	34.7%	31.6%	34.6%	NO
SMART CARD	21.3%	23.3%	25.6%	NO
STUDENT ID	0.78%	1.2%	1.3%	NO
No Response	3.1%	2.8%	3.0%	NO
Total	100%	100%	-	-

Tables III-4 and III-5 demonstrate that minority and low-income populations used passes at a higher rate than the general population in the 2020 Title VI Survey, while minority households also used smart cards at a higher rate, indicating the populations of concern are already using fare media that will provide the benefits of fare capping.

In addition, STA reviewed other agencies’ equity analyses where fare capping was included, and those reports found no disparate impact or disproportionate burden from the introduction of fare capping. The consulted reports included:

- IndyGO: Fare Policy Proposal and Equity Analysis (2019)
- TriMet (OR): Title VI Fare Equity Analysis for Migration to E-Fare (2016)
- Greater Dayton Regional Transit Authority (RTA): Title VI Fare Equity Analysis for New Payment System & Proposed Fare Changes (2021)
- NFTA Metro (Buffalo, NY): Fare Equity Title VI Analysis (2016)

Reduced Fare Discount Programs

STA is expanding access to its reduced fare discount programs by increasing eligibility for seniors through a reduction in the age limit and creating new reduced fare discount programs for:

- Retired and active-duty military
- Teenagers (13-18 old)
- Youth (6-12 years old)

STA is still exploring available data to expand the analysis and will update the analysis as appropriate. Table III-6 shows the results of increasing eligibility for seniors.

Table III-6: Increase in Senior Eligibility Access Analysis

	Service Area Population	Current Access	% w/ Current Access	Future Access	% w/ Future Access	Change in Access
Overall	323,953	-	-	-	-	-
65 +	-	49,145	15.2%	-	-	-
60+	-	-	-	68,845	21.3%	40.1%

In analyzing the impacts on military veterans, STA isolated the impacts on those veterans between the ages of 18-64. Under STA’s existing programs, those customers would most likely not be eligible for a reduced fare. Creating the Stars and Stripes program would provide discounts for those customers. Table III-7 shows the results of increasing eligibility for veterans.

Table III-7: Increase in Veterans Eligibility Access Analysis

	Service Area Population	Current Access	% w/ Current Access	Future Access	% w/ Future Access
Overall	323,953	-	-	-	-
Veterans (18-64)	-	-	-	14,704	4.5%

Analyzing the impacts on teenagers and youth is more difficult, as census data does not exist that shares the same age range to allow for a 1:1 analysis. STA is continuing to explore available data and will update the analysis as appropriate.

In all analyses of the impacts of the reduced fare discount programs, no disparate impact or a disproportionate burden was found. However, additional analyses will be explored as data becomes available.

Summary

STA evaluated the major fare policy revisions and the access to fare media based on current implementation information available and determined there was no evidence of disparate impact on minority households or disproportionate burden on low-income households. *Table III-8: Summary of Fare Equity Analyses*

Policy	Fare Media Access	Fare Capping	Discount Programs
Disparate Impact	NO	NO	NO
Disproportionate Burden	NO	NO	NO

STA will return and update this analysis once additional implementation steps are developed, including:

- Specific vendor identification. The initial vendor access analysis assumed that all potential InComm retailers in the region agree to carry STA products; and that all retailers where STA currently sells passes agree to become partners and continue to carry STA products.
- Information access. How STA customers without internet access can easily add cash to their cards and can easily track their balances will be important to understanding any potential disparate impacts or disproportionate burden.

Section IV. Public Outreach

A full description of the public outreach process, as well as an analysis of the public input received, can be found in Appendix B: *Proposed Fare Policy Revisions Public Outreach Summary* report.

Appendix A: Fare Equity Analysis Methodology

STA's methodology for evaluating fare equity, in assessing any benefits or impacts associated with the proposed fare policy revisions, is outlined within this appendix. Due to the nature of the new fare media, a spatial analysis of vendor locations is required in addition to an analysis of the fare policy changes.

Federal Guidance

The Federal Transit Administration (FTA) provided guidance for conducting a Fare Equity Analysis in Federal Circular 4702.1B. This guidance describes subjects of analysis and procedures to be used if proposed fare changes result in disparate impacts or disproportionate burdens to riders. The Circular also requires that transit providers use ridership surveys for their analysis and specifies certain categories of information to be included in their final equity documentation.

General Methodology

Each policy will be assessed for the benefits or, if applicable, the burdens borne by minority, low-income, and all riders. If the percent of riders receiving benefits or burdens exceed a range of (+) ten percent between minority and overall population or low-income and the overall population, then a disparate impact or disproportionate burden may exist.

The primary source of data used for the analysis was derived from the 2020 Title VI Rider Survey conducted between November 11, 2020, and December 15, 2020. Due to social distancing requirements imposed during the COVID-19 pandemic, on-board rider surveys that had been conducted in previous years were suspended. A two-page self-administered survey was posted on Spokane Transit's website, distributed by email to interested parties (including community organizations and local jurisdictions), and sent by direct mail to 7,215 addresses (Reduced Fare Mailing List). A total of 524 surveys were returned to Spokane Transit. An analysis of the demographics showed that the survey respondents were representative of the overall population of the Spokane Transit service area. That survey allowed respondents to identify their race, ethnicity, household size, and household income. For the purposes of this analysis, minority riders will be considered those riders who identified as any of the following: American Indian/Alaska Native, Asian, Black/African American, Hispanic/Latino, Native Hawaiian/Pacific Islander, or "other" as applicable; non-minority riders will be those who identified as White, alone, in the survey. Survey respondents who refused to identify their race or ethnicity were not included in the analysis concerning disparate impact.

Low-income riders were considered riders who described their total annual household income in ranges that are within those thresholds set by the US Department of Health and Human Services (DHHS) poverty guidelines in 2020 (see Table A-1 for details). Survey respondents who refused to identify their income or household size were not included in the analysis concerning disproportionate burden.

Specific Methodologies

Fare Media

STA is introducing an account-based fare collection system with a smart card and mobile ticketing application as the primary, non-cash, fare media. Because use of the account-based system is a prerequisite to access some of the benefits offered by the new system, STA wanted to know the answers to two questions:

1. How does the use of various fare payment types compare among various populations? and
2. How does the access to existing and proposed vendor locations where the fare media will be available for purchase and reloading compare?

Fare Payment Type Analysis

For the Fare Payment Type Analysis, STA first needed to determine how the rider paid their fare, as well as the self-identified race and income status for that respondent. All the data came from the 2020 Title VI Rider Survey conducted between November 11, 2020, and December 15, 2020.

Fare Payment

For Fare payment, there were 6 options available:

- Smart card
- Cash
- Paper bus pass
- Student ID
- Monthly Pass (includes: adult 31 day pass, youth 31 day pass, reduced fare 31 day pass, paratransit monthly pass, shuttle park monthly pass)
- Other Pass (includes: 2-hour adult/youth pass, 2 hour reduced fare pass, day pass, seven-day pass, paratransit one ride pass)

These were combined into four categories for analysis purposes:

- Smart Card
- Cash
- Pass
- Student ID

Race Identity

The survey asked respondents to self-identify by race, with the option of checking all that apply. The options presented were based on the US Census categories:

- American Indian or Alaska Native
- Asian
- Black or African American
- Native Hawaiian or Pacific Islander
- White
- Two or more races

- Other (please specify)
- Prefer Not to Say

Respondents were also asked about whether they identified as Hispanic or Latino/Latina.

Low-Income

To calculate the income status of a respondent, STA reviewed the responses to two demographic questions – how many people in your household, and what is your annual household income? Low-income riders were considered riders who described their total annual household income in ranges that are within those thresholds set by Department of Health and Human Services (DHHS) poverty guidelines in 2020 (see Table A-1 for details). Survey respondents who refused to identify their income or household size were not included in the analysis concerning disproportionate burden.

Table A-1: Low-Income Thresholds

Number of People in Household	DHHS 2020 Poverty Limit
1	\$12,760
2	\$17,240
3	\$21,720
4	\$26,200
5	\$30,680
6	\$35,160
7	\$39,640
8	\$44,120

Fare Payment Type Analysis

To complete the fare payment type analysis, the fare payment identified was cross tabulated with (a) the self-identified race and (b) the low-income status, and those responses compared to the overall population for those fare payment types.

Vendor Access Analysis

Following the fare payment type analysis, the next step for STA was to look at vendor access for various populations to identify if there is a disparate impact or disproportionate burden. Because use of the account-based system is a prerequisite to access some of the fare policy benefits, STA analyzed access to proposed locations where the fare media will be available for purchase and where cash may be used to load funds to riders' smart cards.

Datasets Used

The American Community Survey (ACS) surveys a sample of the population, gathering valuable information on characteristics including income and race. The ACS is provided in 1-year and 5-year ranges. The 5-year datasets are averages of the years and is the most comprehensive and precise dataset with all the information needed for this examination. The most recent version of the dataset is the ACS 2015-2019: 5-year estimates; these datasets were used for this analysis. All datasets are at the block group level, unless otherwise noted.

- Table B01003 Total Population
- Table B02001 Minority Population
- Table B17021 Poverty Status of Individuals in Past 12 Months by Living Arrangement

Vendor Location

The account-based fare media available at vendor locations requires different technologies than STA's existing fare media. As such, STA is working with InComm, a global company with a network of partner retail locations providing smart card technology compatible with the new STA fare collection system, to identify potential vendor locations in the STA service area. STA is also intending to negotiate with the existing retail network to support the sale of smart cards and loading of funds.

The initial vendor access analysis assumed the following for vendor locations for the new fare technology system:

- All potential InComm retailers in the region agree to carry STA products
- All retailers where STA currently sells passes agree to become partners and continue to carry STA products

Determining Accessible Population

Access to transit and transit amenities can be determined by measuring the estimated distance a rider would walk to the route or amenity. STA regularly uses ½ mile as the standard walking range for its users. For the purposes of this Title VI analysis, a buffer area of ½ mile will be applied. Overlapping buffers will be dissolved.

Population data are attributed to Census block groups evenly, which are represented by polygons in the spatial software. When overlaying a buffer onto a polygon, a portion of the polygon may fall outside the buffer. STA staff will determine a population's access to a vendor by assuming that only the area of a polygon that falls within the ½ mile buffer has access. Therefore, the proportion of the polygon within the buffer and the proportion of the Census block group population will be the same. For example, if 1/3 of a block group falls within a vendors ½-mile buffer, then only 1/3 of that block group's population will be considered to have access to that vendor.

Spatial Methodology

The following methodology was applied to determine if the locations of proposed vending locations will have a disparate impact or disproportionate burden.

Analysis Steps

1. Plot all current and proposed vendor locations. Merge and buffer them by ½ mile.
2. Calculate percentage of total population, low-income population, and minority population within the buffers for current vendor locations and proposed vendor locations.
3. Compare current access to proposed access for all populations.
4. Determine if there is a disproportionate burden and/or disparate impact. If the change in protected populations (i.e., low-income and minority populations) is in the acceptable range, then there is a determination of no impact. Table A-2 provides a detailed explanation for every column within the table.

Table A-2 provides a detailed explanation for each column in Table III-3, which is utilized in the Fare Equity Analysis section to explain the results of the analysis.

Column	Explanation
Service Area Population	The population of the service area. The service area is all persons living within a ½ mile radius of an STA route (September 2021 network). The population information is expressed in several groups – overall, minority, and low-income.
Current Access	Those in the service area and within ½ mile of a current STA vendor
% w/Current Access	Population with current access divided by total service area population of the group
Future Access	Those in the service area and within ½ mile of a proposed STA vendor
% w/Future Access	Population with future access divided by total service area population of the group
Change in Access	The percent difference in access Current Access by Group and Proposed Access by Group
Title VI Acceptable Range	The policy is applied as a (+) 10 percent of impact (or change) on total population
DI/DB	Determination of disproportionate burden (low-income) and/or disparate impact (minority). If the changes in access for the protected population is outside the applied acceptable range, it is determined there is an impact.

Appendix B: Fare Policy Revision Public Outreach Summary

See accompanying “Public Outreach Summary” report.

Public Outreach Summary

Proposed Fare Policy Revisions

Final

1/20/2022



Spokane Transit assures nondiscrimination in accordance with Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act. For more information, see www.spokanetransit.com. Upon request, alternative formats of this information will be produced for people who are disabled. Please call (509) 325-6094 (TTY Relay 711) or email ombudsman@spokanetransit.com.

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Section 1: Introduction

As Spokane Transit Authority (STA) advances *STA Moving Forward*, the 10-year plan for more and better transit services in the region, it is implementing a modernized fare collection system, enabling it to introduce new benefits and provide greater convenience to its riders. These benefits are encompassed in proposed fare policy changes and the introduction of an account-based system with durable fare cards and a mobile ticketing application.

This report documents STA's outreach efforts with regards to the proposed fare policy revisions. The outreach was designed to engage both the general public, whether current bus riders or not, as well as identified vulnerable and marginalized populations to inform Title VI fare equity analysis. The fare equity analysis was performed in accordance with the requirements specified in the Federal Transit Administration (FTA), Circular 4702.1B *Title VI Requirements and Guidelines for Federal Transit Administration Recipients* and STA's 2020 Title VI Program and the policies outlined in STA's Comprehensive Plan, *Connect Spokane, A Comprehensive Plan for Public Transportation*, and can be found in the accompanying report *Preliminary Title VI Fare Policy Revisions Equity Analysis*.

STA's Communication and Public Input Policies

Connect Spokane is STA's comprehensive plan, setting forth a vision and policy framework to guide decisions made by STA's Board of Directors, its staff, and partnering agencies that will further Spokane Transit's mission and vision for at least the next 30 years. The Communications and Public Input element of *Connect Spokane* identifies the goals and policies of STA related to public engagement.

As a public agency, Spokane Transit Authority believes that proper communications and public input is of the highest importance.

Policy CI 1.0 – Public Outreach

The following policies are intended to serve as a guide describing public outreach/input requirements for each action. In cases where there are federal or state requirements for public outreach/input, STA will meet the minimum requirements. In cases where STA has requirements in addition to those defined by the state or federal government, STA will follow both.

1.8 Title VI Reporting

During major service reductions and fare increases, STA will conduct an analysis to verify that no discrimination of protected classes takes place.

Title VI provides that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

Race, color, and national origin are protected classes under Title VI. Low-income populations are not a protected class under Title VI; however, the FTA requires transit providers to evaluate the impacts of any fare

changes on low-income populations as well. STA's Title VI policy, adopted in early 2014, identifies how STA assesses disparate impact and disproportionate burden that could potentially result from changes to fare policy. This is described more fully in the *Preliminary Title VI Fare Policy Revisions Equity Analysis* report.

While the proposed fare policy revisions do not include a fare increase, it does include the introduction of new fare media, which STA believes warranted a public outreach effort and a Title VI analysis to meet the needs of our customers and the guidance provided by the FTA. The remaining sections of this report identify the proposed fare revisions, and discuss the public outreach conducted as well as the input received.

Section II. Proposed Fare Policy

Spokane Transit is implementing a new account-based fare collection system that offers smart card and mobile ticketing capabilities to enhance rider access and experience across its network. Through the new system, customers will have increased convenience through electronic fare payment and self-service account management capabilities, while also improving transit system performance by enabling pre-payment of fares and all-door boarding to reduce dwell time.

STA periodically evaluates its fare policy and fare structure. The last major review of the fare structure was conducted in 2016. This policy revision is not proposing tariff revisions, rather is being undertaken in anticipation of the implementation of the fare collection system.

Fare Policy Update Objectives and Overview

The objectives of the update are to incorporate new fare types enabled by the new system and broaden discount programs to encourage ridership and enhance access and equity. The fare policy update has three major components:

- **Fare Media:** Introduce an account-based fare collection system with a card and mobile ticketing application as the primary, non-cash, fare media
- **Fare Capping:** Provide daily and monthly fare caps enabled through the use of smart cards or mobile ticketing application (mobile app)
- **Discount Programs:** Provide more discount options to a broader population of riders

Fare Media

Fare media smart cards and the mobile app, both of which will serve as front end devices for the account-based system, will become the primary fare media used to access the STA system beginning in Fall 2022. The account-based system and fare policies will eliminate the need for daily, 7-day rolling, and 31-day rolling passes. The account-based system will provide for daily and/or monthly fare capping. A description of each fare media type (current and proposed) is shown in Table II-1 below.

Table II-1. Current and Proposed Fare Media Types

Fare Media	Description	Current	With Fare Collection System Implementation
Cash	Exact fare required in cash or coin - no change will be given and pennies are not accepted	✓	✓
Magnetic Stripe Card	Magnetic Stripe Cards are read by making the appropriate contact between the card and the farebox card reader. Paratransit van operators may record fare use of the card for the paratransit rider as needed.	✓	
Connect Card	Connect Cards are chip-embedded cards holding data that allows a vast array of potential fare opportunities. The first Connect Card for a customer will be provided free of charge. Replacement card fees will be based on STA's cost to provide the cards. Connect Cards can also serve as an identity card (by adding a photo and other basic information). Connect Cards can be reloaded with additional value or time and reused indefinitely. The card is read by passing the card near or "within proximity" of the validator hardware.	✓	✓
Institutional Card	Combination ID/Smart Card issued to participants in current STA pass programs	✓	
Mobile App	Manage your fare account or pay with your virtual Connect Card through the STA mobile app.		✓
Limited Use Ticket	Paper RFID ticket that can be read by holding near the fare validator hardware. Available through Group sales only.		✓
Barcoded Paper Ticket	Paper barcoded ticket issued by a Ticket Vending Machine.	✓	✓
Contactless Credit Card	Discover, Mastercard and Visa contactless credit cards read by passing the card near or "within proximity" of the validator hardware.		✓
NFC-based Payments	NFC-based payments such as Apple Pay and GooglePay on a mobile phone can be read by passing the device near or "within proximity" of the validator hardware.		✓

Account-Based Fare Media

The proposed, modernized fare collection system will be account-based. Account-based systems store value in an individualized account; but the fare media only contains credentialing information that enables the fare system to draw from the appropriate account. While all fare media are linked to an account in the fare collection system, meeting STA’s data security policies, STA will categorize fare media as either “registered” or “unregistered”, with additional benefits available to registered media.

Accessing Smart Card Benefits

Customers will be able to reload funds onto their account at multiple locations, including partner retail locations. All funds added to an account will be available for use on all fare media tied to the customer’s account. Funds can be re-loaded onto customer accounts using a fare media smart card at the STA Plaza, partner retail locations, or online. The mobile app can also be used as a device to re-load customer accounts.

Fare Capping

STA is introducing fare capping. Fare capping limits the total amount of money users are charged for rides taken within a specific period; additional rides within that period are free of charge. This new fare policy is intended to promote transit ridership and enhance the customer experience.

Daily and monthly fare capping will be applied in the new system. Only trips that reduce the amount of value in an account, not free transfers, will count towards the daily and monthly fare cap; these are also known as “charged trips”. Fare capping will apply across all STA services, except Vanpool which is a monthly program only.

For the purposes of the policy, a day is defined as the first run of the day to the last run of the day based on STA’s then in effect schedules by route. The daily fare cap triggers after \$4.00 of charged trips (2 paid trips). Trips taken during the free transfer window (within two hours after the charged trip) will not count towards the cap or deduct money from the account. The month will be defined as the calendar month. Table II-2 compares existing policy versus the proposed policy.

Table II-2. Fare Capping – Existing Policy versus Proposed Policy

	Fare Cap	Regular Service	Paratransit	Reduced Fare Discount Programs
Existing Fare Capping	Daily	None	None	None
	Monthly	None	None	None
Proposed Fare Capping	Daily	\$4.00	\$4.00	\$2.00
	Monthly	\$60.00	\$60.00	\$30.00

Reduced Fare Discount Programs

STA is proposing to expand the current discount programs that are offered by the agency. Table II-3 below identifies the current and proposed reduced fare discount programs (including an eligibility description for each).

Table II-3. Expanded Reduced Fare Discount Program

Program Title	Program Description	Current	With Fare Collection System Implementation
Honored Rider	A Fixed Route reduced fare (50%) program available to customers who are: 1) 60 years of age or older; or 2) have a qualifying disability; or 3) have a valid Medicare card issued by the Social Security Administration. An STA-provided reduced fare or paratransit identification card must be shown to the bus operator each time the bus is boarded and the reduced fare paid.	✓ <i>(currently 65 years or older)</i>	✓
Stars and Stripes	A Fixed Route reduced fare (50%) program open to veterans, reserve, and active-duty military with proof of status <ul style="list-style-type: none"> o Active-duty military ID card o VA ID card o DD214 o Driver's license with Veteran designation 		✓
Rider's License	A Fixed Route reduced fare program (50%) available to youth customers (13-18 years of age) when presenting an STA issued pass.		✓
Rider-In-Training	A Fixed Route reduced fare program (100%) available to youth customers (6-12 years of age) when presenting an STA issued pass.		✓
Student	A Fixed Route reduced fare program available to students enrolled in post-secondary education at a technical or job/career training institution. Students who possess valid proof of enrollment in a registered institution are eligible for a discount of 20% off the standard monthly fare cap. Eligible educational and training institutions are either: qualified providers of federal financial aid and have obtained a Federal School Code; or have obtained a vocational school license issued by the Washington State Workforce Training and Education Coordinating Board.	✓ <i>(currently 31-day pass w/discount)</i>	✓

All other existing reduced fare discount programs (such as the Community Access Program) will continue to operate in the same form as previously.

Section III. Public Outreach

Public Outreach Objectives

The public outreach and engagement provided the public, community groups, and project stakeholders the ability to learn about the proposed policy revisions and provide input to help inform the policy and its implementation.

The outreach objectives included:

- Providing context for the proposed policy revisions
- Being inclusive. Reaching out to community-based organizations that serve our community
- Seeking feedback on the proposed policy revisions

Public Outreach Strategy

STA developed a multi-pronged strategy to solicit public input and feedback on the proposed fare policy revisions.

The strategy included:

- A Fare Policy Survey
- Meetings with community-based organizations
- Community meeting presentations
- A launch page on the STA website
- Media campaign
- Public Hearing

Details for each strategic effort can be found in the following sections.

Fare Policy Survey

The primary tool in soliciting feedback on the proposed fare policy revisions was the fare policy survey. The survey was predominantly an online instrument, with copies of the survey mailed to all riders on the reduced fare mailing list. The number of returned surveys are shown below in Table IV-I. The survey was open from November 4, 2021 to December 17, 2021. It could be accessed at <https://www.spokanetransit.com/ride-sta/fare-policy-survey>, and

was available in the following safe harbor languages:

- English
- Spanish
- Russian
- Vietnamese
- Chinese (traditional)

Table IV-I: Total Fare Survey Responses

Survey Instrument	Number of Respondents
Online – English	1227
Online – Spanish	5
Online – Russian	5
Online – Vietnamese	7
Online – Chinese	4
Paper Survey	563
TOTAL	1812

Community-Based Organizations

STA contacted a number of community-based organizations to hold brief, introductory conversations about the proposed fare policy update. The purpose of these conversations was to:

- Provide an overview of the proposed fare policy update and collect input from service providers
- Provide an opportunity to schedule a listening session for their organization
- Inform them of fare policy update schedule
- Ask for assistance in distributing online survey link

By the close of the public outreach period, STA had held introductory conversations with the following 14 organizations:

- The Arc of Spokane
- Catholic Charities
- Family Promise
- SNAP
- Volunteers of America
- Lighthouse for the Blind
- Goodwill Industries
- Lutheran Community Services
- Special Mobility Services (SMS)
- Spokane Housing Authority
- Aging & Long-Term Care of Eastern Washington (ALTCEW)
- Veterans Affairs (VA)
- Providence Adult Day Health & Health Care Foundation
- WorkSource Spokane

In addition, STA attended larger internal meetings with SNAP and WorkSource Spokane, to present to a broader internal audience for those community partners.

Community Meetings

In addition to scheduling meetings with community-based organizations, STA scheduled additional meetings with other community organizations as well that included:

- City of Spokane Community Assembly¹
- City of Spokane Public Infrastructure, Environment, & Sustainability (PIES) Committee
- Spokane Regional Transportation Council (SRTC) Technical Advisory Committee (TAC)

¹ The Community Assembly is a coalition of independent Neighborhood Councils and serves as a forum for discussion of issues of broad interest. Each Neighborhood Council selects one representative and a designated alternate to serve on the Community Assembly

Fare Policy Update Webpage

The STA Communications Department created a launch page on the STA website, <https://www.spokanetransit.com/ride-sta/fare-policy-survey>, to provide a consolidated location for those seeking information on the fare policy update. The launch page included links to:

- A video about the new fare collection system
- A video explaining fare capping
- A link to the Fare Policy survey
- A link to an ESRI StoryMap on the proposed policy
- FAQs
- A link to background on the STA fare policy

Media Campaign

Along with the creation of the Fare Policy Update webpage, the STA Communications department crafted a full media campaign, available at this [link](#). Highlights included:

- Promotion
 - Customer service recorded messages
 - Email and text messages to Mobile Storm subscribers
 - Onboard bus announcements
 - STA Moving Forward stories
- Signage
 - Posters / tri-fold flyers at STA Plaza
 - Fixed Route and Paratransit bulkheads
- Internet
 - Google display ads
 - Paid social media campaign
- Spokanetransit.com
 - Website banners
 - Survey landing page
 - FAQs
 - Videos
- Digital outreach toolkit
 - FAQs and background paper
 - Flyer
 - Posters (English, Russian, Spanish, Vietnamese, Chinese)
 - PowerPoint presentation
 - Videos for social media
- Videos
 - “Take the Survey!”
 - “Fare Capping Explained”
 - Subtitles in English, Russian, Spanish, Vietnamese, Chinese
 - 6 x short social media videos
- StoryMap

- Advertising: General
 - Spokesman-Review
 - Inlander
 - Cheney Free Press
 - Liberty Lake Splash
- Advertising: Targeted
 - Black Lens
 - Fig Tree
 - Latin News Zone
 - Russian News Spokane
 - 2 x Russian / Ukrainian grocery stores
 - 2 x Vietnamese / Asian grocery stores
 - 2 x Mexican grocery / deli

Public Outreach Results

Survey Results

The survey instrument was identical across all versions. The survey had ten (10) questions, along with six (6) demographic questions. Among the ten questions, there were four opportunities for the respondent to write-in their response.

Some notes on the survey and survey analysis:

- For every question, results are provided for: (a) minority respondents; (b) low-income respondents; and (c) all respondents. Based on the notes below, the ‘n’ value (the number of total respondents) will be different for each population. The ‘n’ values are noted in the tables.
- All questions were optional, so some respondents may have not answered every question, or answered some of them incompletely.
- In the demographics portion, respondents were asked to self-identify as to race. Not all respondents chose to do so. Responses marked as “prefer not to say” as well as “other” were excluded from the minority analysis but were included when looking at all respondents.
- In determining low-income status, a respondent had to provide answers on both “the number of people living in your household” as well as “current household income” to make a determination as to status. Not all respondents chose to do so, which impacts the number of responses analyzed for low-income status as compared to all respondents.

The survey results are shown below.

Question 1: In the past 30 days, have you ridden an STA bus route?

	Minority (n = 134)	Low-Income (n= 297)	All Respondents (n= 1641)
Yes	83.6%	87.2%	70.2%
No	16.4%	12.8%	29.8%

Question 1.1: For those who answered YES to the previous question, please consider how you currently ride the bus and pay your fare when you board. Below is a list of ways you may pay today. Please check all that apply for your bus trips taken over the past 30 days.

Note that for this question, n (the total number of respondents) is based on the total number of people who answered YES to the previous question.

	Minority (n = 112)	Low-Income (n=259)	All Respondents (n=1152)
I paid with cash and /or coin at the farebox	50.9%	57.1%	50.4%
I used a two-hour pass or day pass	42.0%	45.6%	32.8%
I swiped/validated my 7-day or 31-day rolling pass	25.9%	19.7%	26.3%
I used an STA Smart Card to deduct/validate my fare	22.3%	24.3%	18.9%
I swiped or tapped my university/employee ID card	10.7%	10.0%	13.4%
I used a reduced fare ID to pay for or use a reduced fare pass	29.5%	37.8%	31.3%
I purchased a ticket from a ticket vending machine	2.7%	0.4%	0.7%
I did not pay my fare due to lack of change, missing pass, or other reason	6.3%	1.9%	3.0%

Of those respondents who paid with cash and/or coin at the farebox for at least one trip, 80.4% of the low-income respondents also used one of the other payment methods, while 71.9% of minority respondents and 62.4% of all respondents used an additional form of payment for a trip.

Question 1.2: Why did you pay with cash/coin on trips taken in the last 30 days? Please mark all that apply.

Note that for this question, n (the total number of respondents) is based on the total number of people who answered “I paid with cash and/or coin at the farebox” to the previous question.

	Minority (n = 57)	Low-Income (n= 148)	All Respondents (n= 581)
I don't know where to purchase a pass in advance	5.3%	10.8%	9.3%
I don't ride the bus often enough to get the full value of the pass	45.6%	43.9%	54.7%
I can't afford purchasing a pass	24.6%	43.9%	26.7%
It is more convenient for me	38.6%	48.6%	43.7%
Other (please specify) ²	43.8%	11.5%	28.7%

² The “Other” responses generally focused on the access issue of getting a new pass or their current pass was lost or expired, and they were using cash until they could get a new one.

Question 2: The following statements are about STA’s proposed fare capping policy. Fare capping eliminates the upfront costs for daily and monthly trips, meaning riders who pay one trip at a time get the same benefit as passengers who pay for a daily or monthly pass. Once a rider pays the cost of a daily or monthly pass, the rest of the rides for that day or month are free. Please read each statement and rate your level of agreement with them.

		Fare capping maximizes the financial benefit to the rider	Fare capping is easy to understand	Fare capping will encourage people to ride transit more often
Strongly Disagree	Minority (n = 136)	6.6%	7.4%	7.4%
	Low-Income (n=303)	6.6%	11.9%	6.9%
	All Respondents (n= 1610)	6.3%	7.7%	7.6%
Disagree	M	7.4%	11.8%	7.4%
	LI	5.3%	14.2%	5.9%
	AR	4.3%	12.9%	6.6%
Not Sure	M	24.3%	19.1%	35.3%
	LI	25.1%	21.1%	36.0%
	AR	21.6%	20.8%	37.2%
Agree	M	26.5%	36.0%	27.2%
	LI	24.1%	30.0%	27.1%
	AR	29.6%	31.7%	25.8%
Strongly Agree	M	35.3%	25.0%	22.8%
	LI	38.6%	22.4%	24.1%
	AR	36.5%	25.0%	22.6%

Question 3: STA plans to introduce a new fare collection system that allows customers to pay with an app on a mobile device or using a Smart Card. Money can be added to the Smart Card online, or by paying with cash or a debit/credit card at a participating retail store, gas station, or the STA Plaza. The new system benefits customers by allowing fare capping, providing the same value of a day pass or monthly pass without paying for it all up front. Customers using their Smart Card or the app on their mobile device may also be eligible for new discount programs. Cash paying customers will not have the same benefits. Given these planned changes, how likely will you use the following methods for paying for your fare when boarding the bus?

		Cash	Smart Card	Mobile Application
Highly Unlikely	Minority (n =137)	26.3%	16.1%	19.0%
	Low-Income (n= 298)	17.4%	14.4%	14.1%
	All Respondents (n=1564)	28.3%	16.4%	22.4%
Probably Not	M	18.2%	8.0%	13.1%
	LI	14.1%	9.7%	10.4%
	AR	17.3%	9.4%	10.1%
Not Sure	M	10.9%	16.1%	16.1%
	LI	16.4%	16.1%	17.8%
	AR	14.5%	17.1%	14.6%
Probably	M	21.2%	18.2%	28.5%
	LI	23.5%	21.1%	16.1%
	AR	18.4%	23.5%	19.8%
Highly Likely	M	23.4%	40.1%	27.0%
	LI	27.5%	38.6%	29.2%
	AR	20.3%	33.6%	31.3%

For those respondents who were identified as low-income AND identified that they paid with cash or coin at the farebox in the last 30 days (137 total respondents), 65% noted they were highly likely or probably going to continue to use cash for some fare payments. However, of those same respondents 54% identified as highly likely or probably to use the smart card, while 51% identified a mobile application as a fare payment method they would highly likely or probably use.

Question 4: Once available, STA wants customers to manage their fares in an online account and use their Smart Card or mobile device to board the bus and pay their fare faster. This is because many customers boarding and paying with cash can cause buses to be late. At some point in the future, STA may discourage paying cash on board the bus by eliminating the option to get a free transfer pass. Customers who pay with a Smart Card or their mobile device would still have the option to transfer for free. If implemented, how would eliminating cash transfers affect you?

This was an open-ended question, and six codes were assigned to identify any major themes from the responses. The six codes were organized into two groups – personal impacts to the respondent as an individual, and potential impacts on the general population of riders:

Individual:

- No Impact (as an individual)
- Negative Impact (as an individual)
- Positive Impact (as an individual)

Population Concerns:

- General concerns about specific populations, including the homeless, low-income, those with developmental disabilities, and seniors
- General concerns about access – to the internet, to locations to load cash, to tracking card balance, etc
- Concerns regarding transfers

Nearly 75% of total survey respondents provided some text for this question (1341). All percentages below are based on the total number of responses to this question (1,341 responses), and not to the total number of survey respondents.

For the individual, 54% of the respondents who provided comments on this question characterized the proposed changes as either having No Impact (42%) or a Positive Impact (12%) on them as an individual rider. 10.8% of all respondents who provided some response to this question identified it as a negative impact.

For the general population concerns, access was mentioned fairly frequently, with about 29% of the responses touching on this theme across all groups, and 26% of those respondents who identified as low income. The following quotes are examples of those concerns. *(all quotes verbatim from the survey)*

Respondent A

"By eliminating cash, that hurts riders that have to scrounge change to get to work, homeless or at-risk people who need to access resources, people who don't have access to mobile devices, and anyone who misplaces their Smart Card. The new payment options are great OPTIONS, but they should be just that, options."

Respondent B

"However, you do it your rider has to continually keep track of money in their account in order to ride the bus. That means going to the bank or trying to remember how much money is left in their account. You seem to think these are easy tasks for low income or no income riders."

Question 5: STA is proposing to introduce a new Smart Card to make the fare payment process quicker and more convenient. In the new system, bus fare could be added to the Smart Card at multiple stores throughout the region, including the STA Plaza. Looking at the following map, select the options below that describe where you would be able to get and load cash onto a Smart Card (please pick all that apply)

	Minority (n = 146)	Low- Income (n= 324)	All Respondents (n= 1790)
Not near any of the above	18.5%	16.7%	13.8%
Near work, home, places I go	81.5%	83.3%	86.2%
Near (by location):			
my place of work	36.3%	25.0%	28.0%
my residence	60.3%	62.0%	49.6%
other places I go	46.6%	49.1%	41.4%

Question 6: STA is also considering new discounts for a variety of riders. These discounts are intended to encourage ridership and lessen the cost of riding the bus. Please rank your support on a scale of 1 (Strongly oppose) to 5 (Strongly support) for each pass program.

		Honored Rider: 50% off fares for pass holders 60 and over (previously was for ages 65+)	Stars and Stripes: 50% off fares for pass holders who are current and former service members	Rider's License: 50% off fares for pass holders ages 13-18	Rider-in-Training: Free fares for pass holders ages 6-12	Student: 20% off the standard monthly fare cap for all students enrolled in technical or job training programs, so students pay \$48 or less each month
1 - (Strongly Oppose)	Minority (n=144)	2.8%	4.9%	4.9%	4.9%	4.2%
	Low-Income (n=318)	3.5%	4.7%	6.6%	6.6%	5.3%
	All Respondents (n= 1523)	3.1%	4.4%	5.7%	5.9%	4.1%
2	M	2.1%	1.4%	2.8%	6.3%	2.1%
	LI	1.6%	3.1%	3.8%	4.7%	0.9%
	AR	1.4%	3.2%	3.2%	4.4%	1.6%
3	M	6.3%	11.1%	13.2%	8.3%	7.6%
	LI	7.9%	10.1%	13.2%	11.9%	10.4%
	AR	7.9%	12.5%	13.5%	12.9%	9.7%
4	M	9.7%	11.8%	16.7%	16.0%	16.7%
	LI	9.1%	10.7%	13.2%	11.3%	11.9%
	AR	10.7%	11.9%	17.2%	14.7%	16.7%
5 - (Strongly Support)	M	79.2%	68.1%	51.4%	61.1%	67.4%
	LI	78.0%	69.8%	60.1%	61.9%	68.2%
	AR	76.9%	66.6%	57.6%	59.2%	65.9%

Question 7: Are there any other rider groups not listed above that should receive discounts?

This was an open-ended question, and six codes were assigned to identify any major groups from the responses. The six codes were:

- Low-income
- Transit should be free
- Riders with disabilities
- Health care workers, first responders, teachers
- Rider loyalty program
- Other

40% of all survey respondents (716) provided some answer for this question. However, no group coded for received more than 11% support. Riders with disabilities were identified by 10.6% of all respondents, while low-income riders were mentioned by just under 9% of respondents. This held true across all groups. There was minimal support for any of the other groups.

Question 8: When the bus arrives at your stop, how important is it to you that you're able to board the bus quickly and efficiently?

	Minority (n = 145)	Low- Income (n= 319)	All Respondents (n= 1524)
Very important	47.6%	48.3%	44.0%
Important	26.9%	29.5%	32.8%
Somewhat important	19.3%	16.3%	17.6%
Not so important	4.1%	5.0%	4.3%
Not at all important	2.1%	0.9%	1.2%

Question 9: The new fare policy proposes to change the name of a "Two-Hour" pass to a "One Ride" pass. A One-Ride pass will still allow riders the exact same ability to ride for two hours, including transfers.

	Minority (n = 142)	Low- Income (n= 318)	All Respondents (n= 1517)
I agree with the new name	32.4%	30.8%	31.2%
I disagree with the new name	44.4%	46.2%	44.8%
I don't know	23.2%	23.0%	23.9%

Question 10: Is there anything else you wish to tell STA about the proposed fare policy update?

This was an open-ended question, and seven codes were assigned to identify any major themes from the responses. The seven codes were:

- One Ride Naming
- Operations (transfers, etc)

- An identified educational opportunity/need
- Fare Costs Thoughts (related to costs, discounts, zones, etc)
- Fare Payment Methods (other methods, retail locations, etc)
- Transit Network (routes, stop locations, etc)
- General Support

Overall, 35% of survey respondents provided some text in this space. None of the themes received more than 10% of the overall responses. Thoughts on fare payment methods rose to the top, with 9.0% of all respondents commenting on either a specific payment method (using credit cards, using Apple/Google Pay, using an Apple watch) or retail locations (noting gaps in the map, or conversely, generally good distribution).

For riders who self-identified as a minority, the most common theme noted was on fare costs thoughts and fare payment thoughts (5.5% of 145 respondents for each) generally focused on the total cost or questioning the lack of zonal payments.

Nearly half (48.9%) of the comments in this section were from respondents identified as low-income. Again though, none of the themes received more than 10% of the responses. Concerns about fare payment methods was the highest for this population group (7.2%) followed by thoughts on overall fare costs (5.4%).

Key Findings

Those who responded to the survey were generally supportive of the proposed fare policy revisions, based on the responses above. Key findings evolved around the following themes:

Rider Characteristics

- There was strong bus rider representation. A super-majority of minority (83.6%) and low-income (87.2%) respondents had ridden the bus in the last 30 days, while just over 70.2% of all respondents had ridden the bus in the last 30 days.
- The response rate by those who self-identified as a minority on the English language survey was 8.2%, less than the overall percentage in the Public Transportation Benefit Area (PBTA) (12.2%). That percentage increases to 9.2% when including the safe harbor language surveys. However, 26% of survey respondents did not answer this question.
- The response rate by those who were characterized as low-income on the English language survey was 18.1%, greater than the overall percentage in the PTBA ((15.6%)

Payment methods

- Cash (57.1%) was used slightly more by low-income riders than minority (50.9%) and all respondents (50.4%) and was the single most used fare payment method across all groups. However, the combined total for ALL pass/card options shows a preference for card/pass as payment methods.
- A majority of all respondents (51.2%) identified as probably or highly likely to use a mobile application, with 57.1% of all respondents probably or highly likely to use a smart card.
- 59.7% of low-income respondents noted they were probably or highly likely to use a smart card, as did 58.4% of minority respondents.

- “Convenience” and “not riding frequently enough” were the two most common reasons identified for using cash, indicating an audience that might benefit from the proposed fare management tools and fare capping.
- All proposed discount programs were supported by a majority of all groups, with Honored Rider (76.9% all respondents, 78% low income, 79.2% minority) and Stars and Stripes (66.6%/69.8%/68.1%) programs receiving the most support.

Educational Opportunities

- On the specific question regarding fare capping, 21% of all respondents (25% low-income, 24.3% minority) indicated “Not Sure” for whether fare capping maximizes the financial benefit to the rider. “Not Sure” was 20% of all respondents’ choice on whether it is easy to understand the concept of fare capping. This suggests a need for a strong educational and informational campaign about fare capping.
- Over 50% of low-income riders still identified as “probably or highly likely” to continue to use cash on the bus. However, nearly 60% of those same riders indicated they were “probably or highly likely” to use a Smart Card.
- 15%-17% of respondents, in all groups, were unsure how likely they were to use either a Smart Card or mobile application for their payment method. This suggests a need for a strong educational and informational campaign about the uses and benefits of the Smart Cards and mobile application.

Access

- The narrative survey responses provided indicate concerns as to whether the cash payment option would be eliminated and/or a perception that minority and low-income households may experience information access barriers (due to income and/or disability). How riders without internet access can easily add cash to their cards and can easily track their balances will be critical to ensuring a strong adoption among the tech adverse, unbanked, and other populations.
- Access to proposed vendor locations was generally good, but there are some identified gaps in parts of the service area that will need to be addressed in the implementation phase.

Appendix A: Survey Instrument

As part of the anticipated launch of its modernized fare collection system in October 2022, STA plans to make it easy for customers to manage their fares online, as well as use contactless fare payment options like smart phones and other mobile devices to pay fares. This customer experience improvement will make the fare payment process more convenient and accessible. Also, contactless payment tools, like Smart Cards and mobile devices, make the boarding process much faster and helps keep the buses and its passengers on time.

STA is also considering a new approach to collecting fares called, “fare capping.” Fare capping ensures that riders are always paying the lowest fare available. It eliminates burdensome upfront costs for daily and monthly passes and means that riders who pay for single trips get exactly the same benefit as passengers who pay for a daily or monthly pass.

1. In the past 30 days, have you ridden an STA bus route? YES/NO

1.1 [THIS QUESTION FOR THOSE ANSWERING YES ABOVE]

For this question, please consider how you currently ride the bus and pay your fare when you board. Below is a list of ways you may pay today. Please check all that apply for your bus trips taken over the past 30 days.

- I paid with cash and/or coin at the farebox
- I used a two-hour pass or day pass
- I swiped/validated my 7-day or 31-day rolling pass
- I used an STA Smart Card to deduct/validate my fare
- I swiped or tapped my university/employee ID card
- I used a reduced fare ID to pay for or use a reduced fare pass
- I purchased a ticket from a ticket vending machine
- I did not pay my fare due to lack of change, missing pass, or other reason

1.2 [THIS QUESTION FOR THOSE USING CASH]

Why did you pay with cash/coin on trips taken in the last 30 days? Please mark all that apply.

- I don't know where to purchase a pass in advance
- I don't ride the bus often enough to get the full value of the pass
- I can't afford purchasing a pass
- It is more convenient for me
- Other - please explain: _____

2. The following statements are about STA’s proposed fare capping policy. Fare capping eliminates the upfront costs for daily and monthly trips, meaning riders who pay one trip at a time get the same benefit as passengers who pay for a daily or monthly pass. Once a rider pays the cost of a daily or monthly pass, the rest of the rides for that day or month are free. Please read each statement and rate your level of agreement with them.

	Strongly Disagree	Disagree	Not Sure	Agree	Strongly Agree
Fare capping maximizes the financial benefit to the rider					
Fare capping is easy to understand					
Fare capping will encourage people to ride transit more often					

3. STA plans to introduce a new fare collection system that allows customers to pay with an app on a mobile device or using a Smart Card. Money can be added to the Smart Card online, or by paying with cash or a debit/credit card at a participating retail store, gas station, or the STA Plaza. The new system benefits customers by allowing fare capping, providing the same value of a day pass or monthly pass without paying for it all up front. Customers using their Smart Card or the app on their mobile device may also be eligible for new discount programs. Cash paying customers will not have the same benefits. Given these planned changes, how likely will use the following methods for paying for your fare when boarding the bus?

	Highly Unlikely	Probably Not	Not Sure	Probably	Highly likely
Cash					
Connect Card					
Mobile Application					

4. Once available, STA wants customers to manage their fares in an online account and use their Smart Card or mobile device to board the bus and pay their fare faster. This is because many customers boarding and paying with cash can cause buses to be late. At some point in the future, STA may discourage paying cash on board the bus by eliminating the option to get a free transfer pass. Customers who pay with a Smart Card or their mobile device would still have the option to transfer for free. If implemented, how would eliminating cash transfers effect you?

5. STA is proposing to introduce a new Smart Card to make the fare payment process quicker and more convenient. In the new system, bus fare could be added to the Smart Card at multiple stores throughout the region, including the STA Plaza. Looking at the following map, select the options below that describe

where you would be able to get and load cash onto a Smart Card (please pick all that apply):
 (Accompanied by map of outlet/retail partners)

Along a bus route I use

- Near my place of work
- Near my residence
- Near other places I go
- Not near any of the above

6. STA is also considering new discounts for a variety of riders. These discounts are intended to encourage ridership and lessen the cost of riding the bus. Please rank your support on a scale of 1 (Strongly oppose) to 5 (Strongly support) for each pass program.

	1 (strongly oppose)	2	3	4	5 (Strongly support)
Honored Rider: 50% off fares for pass holders 60 and over (previously was for 65+)					
Stars and Stripes: 50% off fares for pass holders who are current and former service members					
Rider's License: 50% off fares for pass holders ages 13-18					
Rider-in-Training: Free fares for pass holders ages 6-12					
Student: 20% off the standard monthly fare cap for all students enrolled in at technical or job training programs, so students pay \$48 or less each month					

7. Are there any other rider groups not listed above that should receive discounts?

8. When the bus arrives at your stop, how important is it to you that you're able to board the bus quickly and efficiently?

- 5: Very Important
- 4: Important
- 3: Moderately Important
- 2: Slightly Important
- 1: Unimportant

9. The new fare policy proposes to change the name of a “Two-Hour” pass to a “One Ride” pass. A One-Ride pass will still allow riders the exact same ability to ride for two hours, including transfers.

- I agree with the new name
- I disagree with the new name
- I don't know

10. Is there anything else you wish to tell STA about the proposed fare policy update?

And now, about you...

What is your age?

- Under 18
- 18 to 21
- 22 to 34
- 35 to 44
- 45 to 59
- 60 or over

Gender (select all that apply):

- Woman
- Man
- Non-binary
- Prefer to self-describe: _____
- Prefer not to say

How do you self-identify by race?

- American Indian or Alaska Native
- Asian
- Black or African American
- Native Hawaiian or other Pacific Islander
- White
- Two or more races
- Other (please specify): _____
- Prefer not to say

Are you Hispanic or Latino/Latina?

- Yes
- No
- Prefer not to say

Including yourself, how many people are there in your household? _____

What is your current (annual) household income?

- Less than \$12,880
- \$12,881 to \$17,420
- \$17,421 to \$21,960
- \$21,961 to \$26,500
- \$26,501 to \$31,040
- \$31,041 to \$35,580
- \$35,581 to \$40,120
- \$40,121 to \$44,660
- \$44,660 - \$49,999
- \$50,000 - \$74,999
- \$75,000 - \$99,999
- \$100,000 - \$149,999
- \$150,000 and greater
- Prefer not to say

Appendix B: Public Comment & Survey Responses

Appendix B is 119 pages in length and is thus included as a link its location on the STA website. Appendix B may be accessed at the following link:

https://www.spokanetransit.com/files/content/Appendix_B_Public_Comment_and_Survey_Response.pdf

RESOLUTION NO. 799-22

A RESOLUTION FOR THE PURPOSE OF REVISING THE SPOKANE TRANSIT AUTHORITY TARIFF POLICY AND PROCEDURES FOR FIXED ROUTE AND PARATRANSIT; RESCINDING RESOLUTION NUMBER 791-22; AND OTHER MATTERS RELATED THERETO.

SPOKANE TRANSIT AUTHORITY

Spokane County, Washington

BE IT RESOLVED BY THE SPOKANE TRANSIT AUTHORITY as follows:

WHEREAS, the Spokane Transit Authority (STA) is a municipal corporation operating and existing under and pursuant to the Constitution and the laws of the state of Washington, pursuant to RCW Title 36, Chapter 57A, Public Transportation Benefit Area; and

WHEREAS, the Washington State Legislature passed the Move Ahead Washington transportation package on March 10, 2022, and it was signed into law by Governor Inslee on March 25, 2022; and

WHEREAS, the Move Ahead Washington legislation package included \$33.6 million in grant funding for the 2021-2023 biennium available to public transportation benefit areas under Chapter 36.57A RCW contingent on a transit agency adopting and implementing a zero-fare policy for people 18 and under by Oct. 1, 2022 and annually certifying that it has maintained its local sales tax authority for transit at or above Jan. 1, 2022 levels

WHEREAS, on January 21, 2022, the STA Board of Directors adopted Resolution No. 791-22, approving the current STA Tariff Policy, and

WHEREAS, the STA Board of Directors desires to update its Tariff Policy and revise the fare structure for riders ages 18 and younger to access available grant funding made available through the Move Ahead Washington legislation; and

WHEREAS, STA has conducted extensive public outreach to provide awareness and receive input on proposed updates to its Tariff Policy; and

WHEREAS, STA has conducted an equity analysis of the fare policy changes resulting from an update to its Tariff Policy pursuant to Title VI of the Civil Rights Act, guidance promulgated by the Federal Transit Administration, related policies within *Connect Spokane* and STA's current Title VI Plan; and

WHEREAS, STA finds that the fare policy changes do not pose a disparate impact or disproportionate burden on populations identified in the above-referenced statutes, guidance and policies.

NOW, THEREFORE BE IT RESOLVED by the STA Board of Directors as follows:

Section 1. The STA Board of Directors hereby revises the rates, tolls, and fares identified in the Fixed Route and Paratransit Fares, Vanpool Fares, and Special Event Fares

(effective with fare collection system implementation), a copy of which is attached hereto and incorporated herein as "Exhibit A."

Section 2. Resolution No. 791-22, and all amendments thereto, is hereby revoked, rescinded, and superseded by this Resolution as of its effective date.

Section 2. This Resolution shall become effective upon its date of adoption and shall remain in full force and in effect until revised by Board resolution; provided, the Chief Executive Officer is hereby authorized to implement the effective date of the rates, tolls, and fares identified in Exhibit A as "Fixed Route and Paratransit Fares (effective with fare collection system implementation)" as of October 1, 2022.

ADOPTED by STA at a regular meeting thereof held on the 21st day of July 2022.

ATTEST:



Dana Infalt
Clerk of the Authority

SPOKANE TRANSIT AUTHORITY:



Chris Grover
Board Chair

Approved as to form:



Laura McAloon
Legal Counsel

Fixed Route and Paratransit Fares (currently in effect)

GENERAL PUBLIC Fare Type	Adult (1)	Reduced Fare (2)			Paratransit (3)
		Youth (Ages 6-18)	Student	Reduced Fare	
Two-Hour Pass / Cash	\$ 2.00	\$ 2.00	\$ 2.00	\$ 1.00	\$ 2.00
Day Pass	\$ 4.00	\$ 4.00	\$ 4.00	\$ 4.00	N/A
7-day Rolling Pass	\$ 17.00	\$ 17.00	\$ 17.00	\$ 17.00	N/A
31-day Rolling Pass	\$ 60.00	\$ 40.00	N/A	\$ 30.00	N/A
Monthly Pass (4)	N/A	N/A	\$ 52.00	N/A	N/A
Paratransit Monthly Pass	N/A	N/A	N/A	N/A	\$ 60.00
Summer Youth Pass (5)	N/A	\$ 60.00	N/A	N/A	N/A
Shuttle Park (6)	\$ 40.00	N/A	N/A	N/A	N/A

(1) Up to three children under age six ride free with an adult, youth, student, reduced fare or paratransit passenger - children under age six are not permitted to ride unaccompanied

(2) Reduced Fare programs require verification of eligibility.

(3) Personal Care Assistant (PCA) rides free on Paratransit or Fixed Route with paid paratransit rider (needs no identification, however, the person with whom they are traveling must have "PCA" on their ADA paratransit identification card)

(4) Monthly Student Pass is priced as a 31-day adult pass with discount applied, subject to enrollment and verification by STA in accredited educational program

(5) Three-month youth pass valid June through August (currently piloted at no cost to rider)

(6) Includes parking at a designated parking lot, as stipulated in the Shuttle Park pass agreement

Fixed Route and Paratransit Fares (effective with fare collection system implementation)

GENERAL PUBLIC	Standard Fare (1)	Reduced Fare (2)					Paratransit (3)
		Rider's License: Category A (Ages 6-12)	Rider's License: Category B (Ages 13-18) (7)	Student	Honored Rider	Stars & Stripes	
Fare Type							
One Ride (4)	\$ 2.00	Zero Fare	Zero Fare	\$ 2.00	\$ 1.00	\$ 1.00	\$ 2.00
Farecapping - Daily (5)	\$ 4.00	N/A	Zero Fare	\$ 4.00	\$ 2.00	\$ 2.00	\$ 4.00
Farecapping - Monthly (6)	\$ 60.00	N/A	Zero Fare	\$ 48.00	\$ 30.00	\$ 30.00	\$ 60.00
7-day Rolling Pass	\$ 17.00	N/A	N/A	N/A	N/A	N/A	N/A
Summer Youth Pass (7)	N/A	N/A	Zero Fare	N/A	N/A	N/A	N/A
Shuttle Park (8)	\$ 40.00	N/A	N/A	N/A	N/A	N/A	N/A

GROUP SALES (9)			
Fare Type	Standard Fare (1)	Reduced Fare (2)	Paratransit (3)
Two-Hour Pass	\$ 2.00	\$ 1.00	\$ 2.00
Day Pass	\$ 4.00	\$ 2.00	\$ 4.00
7-day Rolling Pass	\$ 17.00	N/A	N/A
Monthly Pass	N/A	N/A	\$ 60.00
31-day Rolling Pass	\$ 60.00	\$ 30.00	N/A

(1) Up to three children under age six ride free with an adult, youth, student, reduced fare or paratransit passenger - children under age six are not permitted to ride unaccompanied

(2) Reduced Fare programs require verification of eligibility.

(3) Personal Care Assistant (PCA) rides free on Paratransit or Fixed Route with paid paratransit rider (needs no identification, however, the person with whom they are traveling must have "PCA" on their ADA paratransit identification card)

(4) Allows for travel up to two (2) consecutive hours after initial validation

(5) Maximum fare charged per day when paid with a smart card or mobile app

(6) Maximum fare charged per calendar month when paid with a smart card or mobile app

(7) Through the Washington State Transit Support Grant, all Youth Fares to Age 18 will be at no-cost to rider so long as the Transit Support Grant is in place. If the Transit Support Grant is rescinded or not renewed, Youth Fares will be reinstated at their previously approved levels

(8) Includes parking at a designated parking lot, as stipulated in the Shuttle Park agreement

(9) Limited use fare types available for quantity purchases only and not available to the general public

Public Outreach Summary

Zero-Fare for Youth

Draft

6/22/2022



Spokane Transit assures nondiscrimination in accordance with Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act. For more information, see www.spokanetransit.com. Upon request, alternative formats of this information will be produced for people who are disabled. Please call (509) 325-6094 (TTY Relay 711) or email ombudsman@spokanetransit.com.

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Section I: Introduction

The Washington State legislature passed the nearly \$17 billion *Move Ahead Washington* transportation package on March 10, 2022; and it was signed into law by Governor Inslee on March 25, 2022. The *Move Ahead Washington* package included \$33.6 million in grant funding for the 2021-2023 biennium. Eligible transit agencies include public transportation benefit areas under Chapter 36.57A RCW.

To be eligible for transit support grants, transit agencies must:

- Adopt and implement a zero-fare policy for people 18 and under by Oct. 1, 2022. Agencies that adopt and implement a zero-fare policy after Oct. 1, 2022 will not receive 2021-2023 supplemental budget funds and will be eligible for funds beginning in the 2025-2027 biennium.
- Certify annually that the agency has maintained its local sales tax authority for transit at or above Jan. 1, 2022 levels

This became the question to the STA Board of Directors – does STA adopt a zero-fare policy for people 18 and under to be eligible for a share of the \$33.6 million in grant funding?

This report documents STA's outreach efforts with regards to that question, to help inform the Board of Directors decision. The outreach was designed to engage the general public through a public survey.

Section II. Public Outreach

Public Outreach Objectives

The public outreach and engagement provided the public, community groups, and project stakeholders the ability to learn about the proposed policy revisions and provide input to help inform the policy and its implementation. The outreach objectives included:

- Providing context for the proposed policy revisions
- Being inclusive
- Seeking feedback on the proposed policy revisions

Public Outreach Strategy

STA developed a multi-pronged strategy to solicit public input and feedback on the proposed fare policy revisions. The strategy included:

- A Fare Policy Survey
- Targeted outreach to area school districts
- A launch page on the STA website
- Social media campaign
- Public Hearing

Details for each strategic effort can be found in the following sections.

Fare Policy Survey

The primary tool in soliciting feedback on the proposed Zero-Fare for youth was the fare policy survey. The survey was an online instrument only. The survey had 558 respondents. The survey was open from May 12, 2022 to June 20, 2022. It could be accessed at <https://www.spokanetransit.com/news/zero-fare-for-youth/>.

School District Outreach

STA contacted several school districts in the region, asking for assistance in distributing information about the proposed Zero-Fare for youth policy change and a link to the survey. Several of the school districts complied, including Spokane Public Schools, East Valley School District, and Mead School District.

Fare Policy Update Webpage

The STA Communications Department created a launch page on the STA website, <https://www.spokanetransit.com/news/zero-fare-for-youth/>, to provide a consolidated location for those seeking information on the fare policy update. The launch page included links to:

- A link to the Fare Policy survey
- A pdf of a slide deck that provided:
 - Background information
 - Answers to FAQs

Media Campaign

Along with the creation of the zero-fare for Youth webpage, the STA Communications department promoted the survey in several different ways. Highlights included:

- Promotion
 - STA Moving Forward stories
- Spokanetransit.com
 - Website banners
 - Survey landing page
- Advertising: Targeted
 - School district newsletters

Public Outreach Results

Survey Results

The survey had fifteen (15) questions, along with seven (7) demographic questions. Not all respondents were shown all fifteen questions, as some questions were relational to previous answers. Among the fifteen questions, there were four opportunities for the respondent to write-in their response.

Some notes on the survey and survey analysis:

- For every question, results are provided for all respondents. The 'n' values are noted in the tables.
- All questions were optional, so some respondents may have not answered every question, or answered some of them incompletely.
- Nearly 42% of respondents took the time to write-in a response to the final open-ended question "Is there anything else you wish to tell STA?".

The survey results are shown below.

Question 1: Do you have anyone 18 and younger living with you in your household currently?

All Respondents (n= 558)	
Yes	72.2%
No	27.8%

For those who answered “Yes”, they were taken to Question 2. For those who answered “No”, they were taken to Question 10.

Question 2: What age range are the children/youth in your household? (Mark all that apply)

Note that for this question, n (the total number of respondents) is based on the total number of people who answered YES to the previous question.

All Respondents (n=400)	
0-5 years old	19.5% (78)
6-12 years old	56.3% (225)
13-18 years old	69.8% (279)

Question 3: Did someone in your household use the Summer Youth Pass, a zero fare pass that was offered by STA in the Summer of 2021?

All Respondents (n= 400)	
Yes	38.5%
No	61.5%

Question 4: How many in your household are between 0-5 years of age?

All Respondents (n=77)	
1	75.3%
2	20.8%
3	3.9%
4	0%
5	0%
More than 5	0%

Note that this question was only shown to those respondents who indicated they had a 0-5 year old living in their household in Question 2.

Question 5: What challenges or obstacles do you face to riding the bus with your children? (Please choose all that apply).

	All Respondents (n=71)
Never tried it	25.4%
I am concerned with making connections	31%
Service doesn't come often enough	31%
I am concerned about my children's behavior with waiting or riding the bus.	21.1%
I am concerned with my young children riding without an adult	46.5%
Other	21.1%

Of the 15 responses in the "Other" category, the most common responses (a) focused on the inconvenient nature and/or travel time required and (b) lingering concerns about COVID.

Question 6: How many in your household are between 6-12 years of age?

	All Respondents (n=216)
1	58.3%
2	34.7%
3	5.6%
4	1.4%
5	0%
More than 5	0%

Note that this question was only shown to those respondents who indicated they had a 6-12 year old living in their household in Question 2.

Question 7: Given this new "Rider in Training" card, will your child/children be:

	All Respondents (n=216)
Riding the bus alone	16.7%
Riding the bus with friends or older siblings	50.9%
Riding the bus with a parent or adult	73.6%
Probably not riding the bus	13.9%
Other	2.3%

Question 8: How many in your household are between 13-18 years of age?

All Respondents (n=270)	
1	62.2%
2	30%
3	7.4%
4	0%
5	0%
More than 5	0.4%

Note that this question was only shown to those respondents who indicated they had a 13-18 year old living in their household in Question 2.

Question 9: For those 13- 18 in your household, what trips would they use the bus for that they wouldn't otherwise make, or might make using a different mode? Please mark all that apply.

All Respondents (n=71)	
Going to school	75.3%
Meeting up with friends	78%
Going to/from after school activities (including sports)	68.8%
Going to a job	57.8%
Visiting family members	39.5%
Other	14.1%

Question 10: What type of impact will zero fare for youth have on your household?

All Respondents (n=522)	
Positive	70.9%
Neutral	25.7%
Negative	3.5%

Question 11: With a zero fare for youth, do you think your household will ride the bus:

All Respondents (n=521)	
More than today	68%
Less than today	2.1%
Same as today	29.9%

Question 12: STA is seeking to understand community sentiment about zero fare programs for youth. Please carefully review all statements below and select the one that most closely aligns with your personal opinion.

	All Respondents (n=521)
STA should provide zero fare opportunities for youth when other funding is available to cover the costs	14.6%
STA should provide zero fare opportunities only for youth who are low income or face other financial difficulties	6.7%
STA should provide zero fare opportunities for youth in all situations, without considering income or replacement funding	72.6%
STA should provide discounts for youth, but fare should not be discounted to zero cost to the rider	3.8%
STA should not offer any new fare discounts	2.3%

Question 13: In the past 30 days, have you ridden an STA bus route?

	All Respondents (n= 524)
Yes	47.5%
No	52.5%

Question 14: For those who answered YES to the previous question, please consider how you currently ride the bus and pay your fare when you board. Below is a list of ways you may pay today. Please check all that apply for your bus trips taken over the past 30 days.

Note that for this question, n (the total number of respondents) is based on the total number of people who answered YES to the previous question.

	All Respondents (n=247)
I paid with cash and /or coin at the farebox	50.2%
I used a two-hour pass or day pass	32.4%
I swiped/validated my 7-day or 31-day rolling pass	25.1%
I used an STA Smart Card to deduct/validate my fare	14.2%
I swiped or tapped my university/employee ID card	13.4%
I used a reduced fare ID to pay for or use a reduced fare pass	6.9%
I purchased a ticket from a ticket vending machine	0.8%
I did not pay my fare due to lack of change, missing pass, or other reason	3.2%

Question 15: Is there anything else you wish to tell STA?

This was an open-ended question, allowing survey respondents to let STA know what was on their mind.

42% of total survey respondents provided some text for this question (234). All percentages below are based on the total number of responses to this question, and not to the total number of survey respondents.

68% of the respondents who provided comments on this question wanted to add their support for the zero fare for youth policy revision. Some sample quotes (*all quotes verbatim from the survey*)

Respondent A

" I grew up off of the Monroe bus route in Spokane and depended on the bus route from 8th grade on to get places. Without the bus I would never have been able to go to ballet class or babysit and earn income or get math tutoring. We were low income and I lived with just my mom who worked long hours. Thankfully we could afford the bus. I think busses are an essential lifeline to many youth and would love to see kids use it more again."

Respondent B

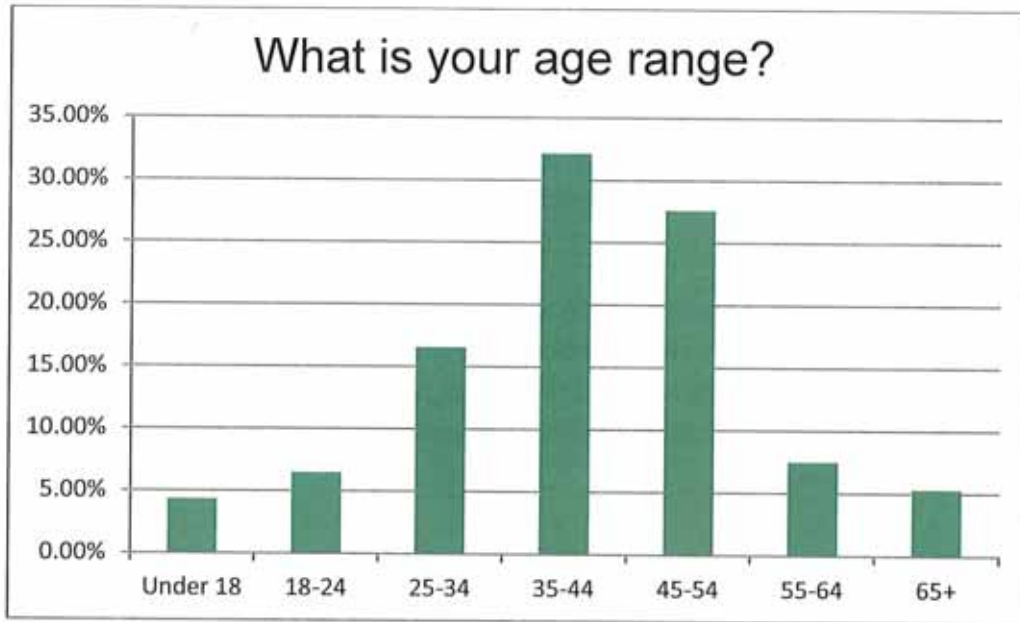
" i just want to put my input as i'm recently 18 and moved out and my little cousin lives with my parents now and it would've been so so incredibly helpful to be offered this when i was young. my cousin would be able to get a job and work if she could get around on the bus. i think it would be so so positive."

The next most common theme of the comments was a desire to see the zero fare (or low fare) expanded to more ridership groups (13%).

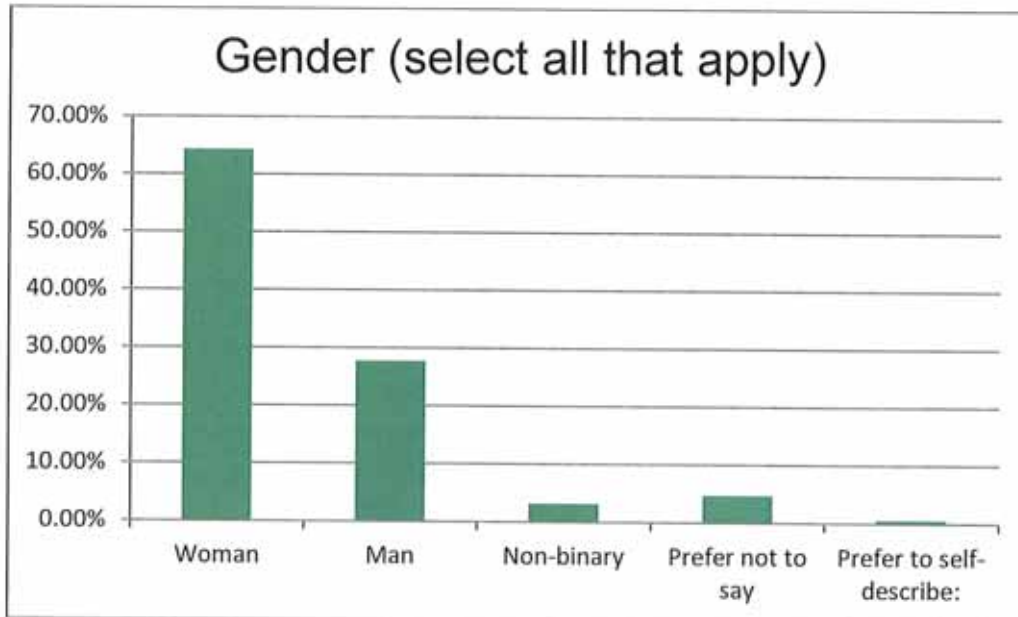
No other theme emerged at a rate greater than 10% of the total comments.

Demographics

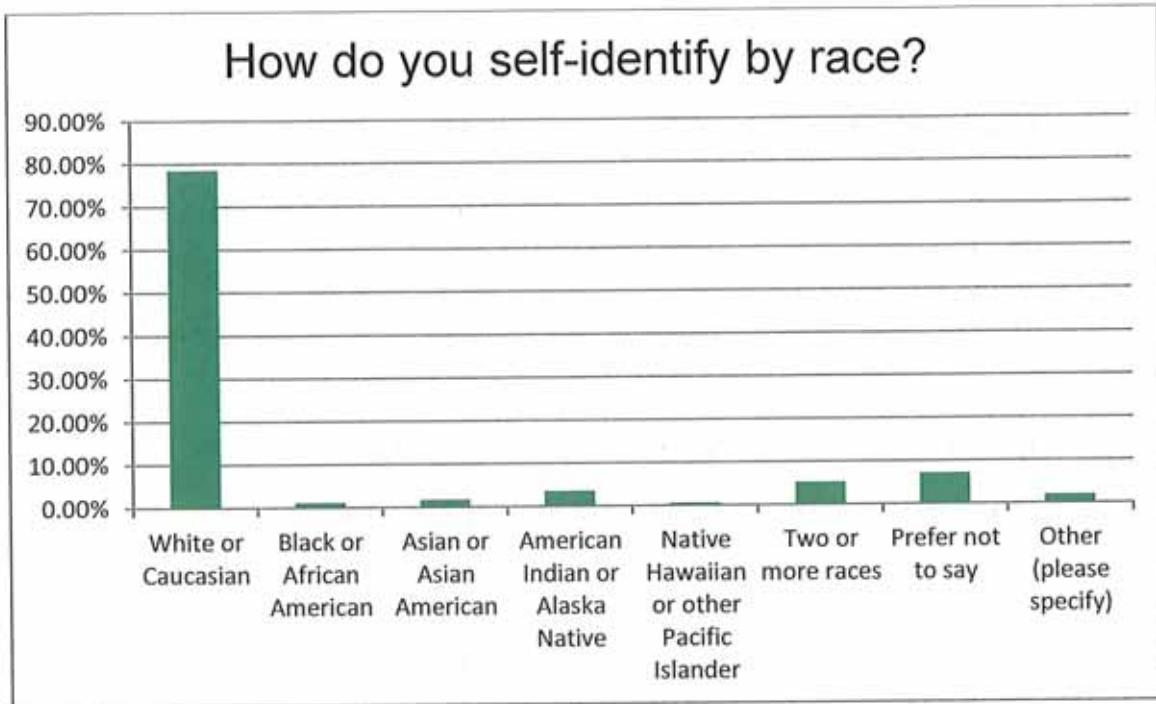
Age Range (n=507)



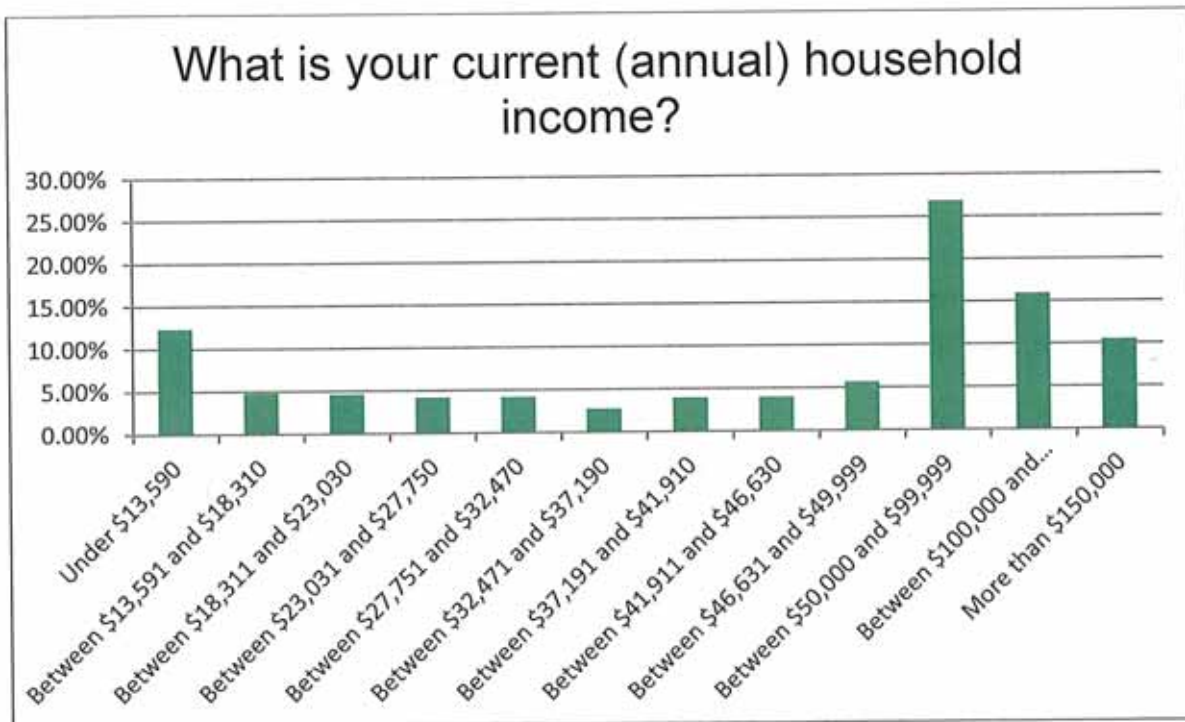
Gender (n=504)



Self-identify by Race (n=502)



What is your current (annual) household income? (n=476)



Appendix A: Survey Instrument

Zero-Fare For Youth

STA is exploring policy changes to allow youth 18 and under to ride with a zero fare. Recent state law changes provide grants to transit agencies if the agency introduces a zero fare program for youths.

STA wants to know about you and your household, and the impacts a zero-fare policy for those 18 and younger would have on you and your household.

If information is needed in another language, contact (509) 325-6094.

Si necesita información en otro idioma, comuníquese al (509) 325-6094.

Для получения информации на другом языке звоните по тел. (509) 325-6094.

Nếu quý vị cần thông tin bằng một ngôn ngữ khác, xin vui lòng gọi số (509) 325-6094.

1. Do you have anyone 18 and younger living with you in your household currently? YES/NO

2. [THIS QUESTION IS FOR THOSE ANSWERING YES TO #1]

What age range are the children/youth in your household? (Please mark all that apply)

- 0-5
- 6-12
- 13-18

3. Did someone in your household use the Summer Youth Pass, a zero fare pass that was offered by STA in the Summer of 2021? YES/NO

Youth 0-5 years of age

4. How many in your household are between 0-5 years of age?

- 1
- 2
- 3
- 4
- 5
- More than 5

5. What challenges or obstacles do you face to riding the bus with your children ages 5 or younger?

- Never tried it
- I am concerned with making connections
- Service doesn't come often enough
- I am concerned about my children's behavior while waiting or riding the bus
- Other (please explain)

Youth 6-12 years of age

6. How many in your household are between 6-12 years of age?

- 1
- 2
- 3
- 4
- 5
- More than 5

7. STA recently approved a new fare program to allow children ages 6-12 with a valid "Rider in Training" card to ride at no cost after registering for the program online or at the STA Plaza. This is planned to go into effect in October 2022.

Given this new "Rider in Training" card, will your child/children:

- Riding the bus alone,
- Riding the bus with friends or with older siblings
- Riding the bus with a parent or adult
- Probably not ride the bus
- Other (please explain)

Youth 13-18 years of age

STA recently approved a discount program for ages 13-18 called a "Rider's License" that would be offered at a 50% discount to the regular fare beginning October 2022 after registering for the program online or at the STA Plaza. STA is now proposing to offer this program at 100% discount (zero fare) to the regular fare.

8. How many in your household are between 13-18 years of age?

- 1
- 2
- 3
- 4
- 5
- More than 5

9. For those 13- 18 in your household, what trips would they use the bus for that they wouldn't otherwise make, or might make using a different mode? Please mark all that apply.

- Going to school
- Meeting up with friends
- Going to/from afterschool activities (including sports)
- Going to a job
- Visiting family members
- Other – please explain

10. What type of impact will zero youth fare have on your household?

Positive	Neutral	Negative
----------	---------	----------

11. With a zero fare for youth, do you think your household will ride the bus:

More than today	Less than today	Same as today
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12. STA is seeking to understand community sentiment about zero fare programs for youth. Please carefully review all statements below and select the one that most closely aligns with your personal opinion.

- STA should provide zero fare opportunities when other funding is available to cover the costs
- STA should provide zero fare opportunities only for youth who are low income or face other financial difficulties
- STA should provide zero fare opportunities for youth in all situations, without considering income or replacement funding
- STA should provide discounts for youth, but fare should not be discounted to zero cost to the rider
- STA should not discount fares for youth any more than it does today.

Travel

13. In the past 30 days, have you ridden an STA bus route? YES/NO

14. [THIS QUESTION FOR THOSE ANSWERING YES ABOVE]

For this question, please consider how you currently ride the bus and pay your fare when you board. Below is a list of ways you may pay today. Please check all that apply for your bus trips taken over the past 30 days.

- I paid with cash and/or coin at the farebox
- I used a two-hour pass or day pass
- I swiped/validated my 7-day or 31-day rolling pass
- I used an STA Smart Card to deduct/validate my fare
- I swiped or tapped my university/employee ID card
- I used a reduced fare ID to pay for or use a reduced fare pass
- I purchased a ticket from a ticket vending machine
- I did not pay my fare due to lack of change, missing pass, or other reason

5. Is there anything else you wish to tell STA?

And now, about you...

What is your age?

- Under 18
- 18 to 21
- 22 to 34
- 35 to 44
- 45 to 59
- 60 or over

Gender (select all that apply):

- Woman
- Man
- Non-binary
- Prefer to self-describe: _____
- Prefer not to say

How do you self-identify by race?

- American Indian or Alaska Native
- Asian
- Black or African American
- Native Hawaiian or other Pacific Islander
- White
- Two or more races
- Other (please specify): _____
- Prefer not to say

Are you Hispanic or Latino/Latina?

- Yes
- No

What is the primary language spoken in the household?

- English
- Spanish
- Vietnamese
- Russian
- Chinese
- Other

Including yourself, how many people are there in your household? _____

What is your current (annual) household income?

- Under \$13,590
- Between \$13,591 and \$18,310
- Between \$18,311 and \$23,030
- Between \$23,031 and \$27,750
- Between \$27,751 and \$32,470
- Between \$32,471 and \$37,190
- Between \$37,191 and \$41,910
- Between \$41,911 and \$46,630
- Between \$46,631 and \$49,999
- Between \$50,000 and \$99,999
- Between \$100,000 and \$150,000
- More than \$150,000

Appendix B: Public Comment & Survey Responses

This section includes the responses to the "Other" category from Questions 5, 7, 9 and the open-ended question number 15.

5. What challenges or obstacles do you face to riding the bus with your children? (please choose all that apply)
Other (please specify)
I've been concerned with Covid so I haven't chosen the bus during the pandemic but I've taken our kids on public transport all over the world prior. I'm Spokane many places we go to don't have easy routes.
Not concerned.
It's hard to have to break down the stroller for my son when I get on the bus
Plaza bathrooms are full of "drug addicts"
Takes a long time
For the last few years I've been concerned about Covid safety on buses with children, although that is starting to abate.
Coach operators don't provide a safe atmosphere. Most of the time they don't care about what is happening to do something about it.
Cost sometimes outweighs the convenience
Price
We've been reluctant to use public transit during COVID
COVID related concerns
need routes during school year that coordinates with local high school start and stop times
All the creeps that ride the bus
Having to pay fair for them too
My child really doesn't pay attention to which bus goes where she has little knowledge of directions and where bus lines will lead to

7. Given this new "Rider in Training" card, will your child/children be:
Other (please specify)
Riding the bus with a parent only at first. If that goes well may consider letting them ride with only older siblings.
All of the above
Likely riding the bus to high school in 2 years
I would need more details as to what the program entails
No service where we live. Grandview area.

9. For those 13- 18 in your household, what trips would they use the bus for that they wouldn't otherwise make, or might make using a different mode? Please mark all that apply.

Other (please specify)

Getting to summer programs

Non-school related learning opportunities, attending sports and entertainment events, shopping

Dining out with family

Errands

Parks and pools

Doctor's appointments, grocery shopping, community events

Church

Gym

Going to the pool or library

Appointments with parents

Going shopping

going downtown or to Northtown mall with friends

Seeing the city

Going to medical appointments

Hanging out

Library, swimming pool

Social events

Shopping, Dr, errands

Gym

Going to community events

I

Shopping and hobbies

Appointments

Grocery shopping

Accessing mental health services, gym, library, community activities

Going to appointments

Doctors appointments

None

Going to Library

Exploring parks, activities in spokane

Medical appts

Shopping - evenets

Learning the value And the appreciation. Life Lessons.

Getting home from school

Doctor appointments

Summer activities

Hiking library etc

15. Is there anything else you wish to tell STA?
Open-Ended Response
Summer only routes to locations traditionally not serviced by STA. (Pattison's North, Spashdown, Boulder Beach)
Free fare for youth accustoms the next generation to transit, which will increase use, and reduce the need for more vehicles on the road. Now if we can just increase operating hours early morning, evenings & weekends, along with 15 minute headways in the evenings and on weekends.
Zero fare for youth is awesome!!!
I grew up off of the Monroe bus route in Spokane and depended on the bus route from 8th grade on to get places. Without the bus I would never have been able to go to ballet class or babysit and earn income or get math tutoring. We were low income and I lived with just my mom who worked long hours. Thankfully we could afford the bus. I think busses are an essential lifeline to many youth and would love to see kids use it more again.
More routes in the valley along Trent would be helpful, also up and down pines. With all the apartments going I'm sure there is a need.
More busses on the weekends please!
Why just youth?
My household only uses the STA reducing or removing the cost for children and teens to ride the bus would increase our ridership significantly.
Anything you can do to de-stigmatize riding public transport, we need a growing youth populaces both rich and poor who value public transport. Honestly giving your product away to minors is the best method to ensure advocates and riders into the future! Thanks for all you do, the bus is awesome in spokane and the bus + bike is unstoppable!
Thank you for what you do for the community!
Why is this a question? Let the kids ride for free. The past couple of years have been hard enough on them, can't we at least give them a free bus ride?
I believe zero fare for people under 18 could be so helpful. Kids who have jobs but no other wag of transportation. Parents who want to get out with kids but are low income. The positive impacts heavily outweigh the cost. And the bus will be running that route regardless. Help the kids.
I think zero-fare for youth is terrific!
There should be the same program for senior citizens.
The summer youth pass is lovely and I would love to see something similar implemented year round. It may also be helpful to make some "riding the bus" type of classes or videos for younger riders, because it can be a little confusing and overwhelming at times
Any youth should never be stranded because of lack of transportation. I truly hope this program is passed for all ages
Keep masks in place
Use proof of student Id for students to use the bus for free
Youth riders become adult riders.
We need a route that goes across the maple st bridge stops on both sides.

15. Is there anything else you wish to tell STA?

I really appreciate the opportunity my high school student has had to use STA this year while the Durham bus routes were in -- well, I'll say it -- chaos. His STA route was 90% on time (that's just a guess) and always got him home faster than riding the yellow school bus. I wish there were better ways to get across town than going to downtown and transferring, but I understand it's a complicated system. Just wish it could be better. In some cases, it's faster to walk 3 miles than to grab the bus. As the city grows I would like to see a larger evaluation of routes and more direct access. Thanks for providing an option for people to get around town!!

I support any change that encourages the use of public transportation and lowers the number of cars on the road.

Zero fare for all youth will give them agency and their families good options for transport to schools/extracurriculars! It is such a good idea!

STA should provide zero fare opportunities for youth in all situations when replacement funding is available. STA should always provide zero fare opportunities for low-income youth AND adults without regardless of replacement funding availability. Qualifying households should be identified and contacted by STA in order to limit administrative hurdles for riders.

I have two special needs children with appts four days a week and free bus fare would make it so much easier to make all appts and not have to worry about how to pay for it or waiting for SMS to send bus passes that always arrive late and cause us to miss the first week of appts or have to find a way to pay out of pocket with our already strict budget

No

Make the bus shop, in he plaza, blind accessible. Something as simple as rugs or non-skid floor tape that leads from the doors to the main counter. I keep getting tangled in the straps on the posts used to make a cattle-run.

N/A

You're driving the buses whether kids are there or not, and access to school and other things for kids can be essential. When the routes are there for the benefit of the community, it just makes sense for kids to be able to take them at no charge regardless of circumstance.

i just want to put my input as i'm recently 18 and moved out and my little cousin lives with my parents now and it would've been so so incredibly helpful to be offered this when i was young. my cousin would be able to get a job and work if she could get around on the bus. i think it would be so so positive

Great idea. This will alleviate gas prices and useage.

Have lower fares for people who are on limited budget not just social Security

I believe children shouldn't have to worry about the cost of transportation when it comes to school or a job or just a fun activity especially with all the other costs of living. I believe that children should be able to use public transportation outside of school buses to utilize the parks and other amazing scenery we have to offer with no cost of riding the bus no matter their home financial situation is

Lower the fair for adults

No.

I think to many adults will try to take advantage of the youth free fare and claim they are 18 when they aren't just like they do by using youth bus passes. It will become too much on the driver and cause a conflict between the driver and passenger.

No

Have a cash free system for regular riders

Nope

15. Is there anything else you wish to tell STA?
add trains!
Having come from other countries with robust public transportation I would LOVE to ride the bus more often. However the times/routes are often unreliable. I hope Spokane can expand their public transit to make us a better city!
I teach high school, and most of my students ride the bus to get around in general, as well as to get to school. Let's do the right thing for them & their families, for schools, and for addressing climate change by making public transportation the norm.
I really think zero fare should implemented until 21
A lot of kids go to school outside of their designated boundary and free bus fare would really help! Also, kids that get familiar with buses are more likely to use them as adults.
My family and I were avid bus riders for 10+ years, it would of made such an impact to have this when my kids were little and find were tight. I think it will help kids get around and enjoy life more and take the stress of of already stressed out parents.
N/A
I think zero fare for youth is a great policy even though I don't have kids. I support my tax dollars going to this community asset.
I think this program will positively affect this children who cannot afford a bus pass not only in the summer time but also during their school year, especially as they become independent in their younger years this program will be a terrific opportunity for our youth community to move about and stay in touch with friends and family.
You should allow pennies
I think the opportunity for STA to join forces with the school district to help provide transit for students is crucial. It is a public service that is greatly needed with the current bus shortage. It would help students who want to sign up for Zero Hour classes get to class. To date, the school system does not provide buses for Zero Hour classes, therefore those classes were really only available to students whose parents have the luxury to drive them, who have their own car (also a luxury) or who were close enough to school to walk. Providing free public transit to all students would help resolve a discrepancy in which students can and cannot attend Zero Hour. Also, you will be growing a new generation of public transit users.
If you implemented this I will not be riding the buses anymore. Reason 1 is I pay for my ride they should to. Reason 2 if you let them on without paying I will not feel safe. You provide NO security for the passengers, and there are way to many 18 and under who will abuse this program. It will become a free for all and trouble will be on these buses. Also how do you really plan to enforce this. Anyone can say that they are 18 and under. It will be just like you summer youth passes and the old guy is riding with it. You do not currently enforce your policies NOW. That is why I will not be riding. Will not feel SAFE.
Advertising discounts for 18 and under and low income people and seniors would be helpful too!
I am very uncomfortable with my teen daughter riding the bus because the bus stops by LCHS are not in safe area. I would feel better knowing that someone is providing security at those stops from 7-9 am and 2-4 pm (even if that's SPS SROs). I'm also nervous about the Plaza, I hope you have good security there. Security is going to make me more likely to let my kids ride, not free fare. Safety is the deal breaker.
Buses are very important and have helped our family a lot.
This would help a lot of people!!
I think zero fare for youth is a great idea! It won't affect me but it will be great for others.
Thank you for the opportunity to provide our input!

15. Is there anything else you wish to tell STA?

As a single parent, it is difficult to get my son to various places. The summer bus pass was great, it would be helpful to have this year around.

This would be helpful.

We went to the plaza downtown to buy my 14 yr old daughter a bus pass.. drug addicts were doing drugs in the bathrooms and on the benches while 5 "transit officers" all stood in a circle socializing with each other. Totally makes me feel safe letting my daughter ride the bus alone (sarcasm). Do better.

no

I want public transportation to be a viable option for youth in Spokane. In order for that to be the case, safety MUST be the highest priority. Also, providing zero fare to all youth, regardless of income, may help to break down stigma around riding buses rather than taking a private vehicle.

Thanks for working on this!

I believe this zero fare implementation would be incredibly positive and I think rider numbers would go up

We drove our daughter to and from school every week day from September 2021 to May 2022 because her bus route arrived two hours' late and dropped her off two hours' late due to a lack of drivers. I am still getting emails from SPS stating a school bus route has been changed. There is an STA bus stop outside our apartment. The route takes passengers to Ferris making commuting to school convenient, but we didn't use it because we would have had to purchase a bus pass for her, increasing our costs. My husband uses his Gonzaga U ID card to commute to work and travel to other parts of the city for meetings. The STA app makes things easy. Our oldest son (age 20 and a GU student) just used his bus pass today to go to a coffee shop on the other side of the city. He started using the bus as a college student because the bus pass is free with his GU ID. STA is so reliable that I know what time to expect my husband when he takes the bus to come home. It would be great if school students could use their student ID cards as a free bus pass to commute to school. We can't count on the school buses, but we know we can count on STA.

This program will be beneficial for my household. My daughter has been riding the City bus to and from school this entire school year by herself.

If the Zero fare, I would suggest just only do the New Years Eve for everyone once a year would be more fair. If you want more youth to ride the bus. I would suggest make a Winter pass like Summer pass

My boys are 13, and are moreso allowed to go places independently so public buses add endless opportunities. I work in public schools, and some students are homeless. Let's give everyone PASS so there is NO differentiation between humans

I believe this is the best thing ever I think it will offer more opportunities for kids over the year to be able to get to and from places other wise they can't do them because of single parent house holds, this will help keep kids busy and out of trouble.

This would be such a great opportunity for my children and gives them the feeling of independence and self-reliance children and youth need!

I think using STA for high school bus transport in SPS is a fantastic idea!

We don't use the bus but would support zero fare for those who do

There are MANY youth in Spokane whose latent s to not have the means, car nor income, to drive them to school, work or elsewhere. Zero fare for youth would make a big positive impact on our community

Love the summer free passes!

Something the survey did not ask about, but I hope the city is considering, is that there is a goal to have more ppl using clean, public transportation rather than personal vehicles. A program like this could normalize public transportation for an entire new generation.

15. Is there anything else you wish to tell STA?
I think free fare for youth is a great program - I got a pass during high school and it allowed me to get to and from school each day without stress. And giving youths mobility is just a good thing to do.
My daughter will be attending The Community School next year which does not have school buses so she will need this to get to/from school.
It would be an amazing asset for so many in these difficult times
Train your coach operators to care about their passengers. A lot of them are fairly rude and when something is wrong on the bus, ex...other passengers breaking the rules, absolutely nothing is done.
Not all children come from families able or willing to pay for transportation. When I needed the public bus system as a child I experienced both. Not being able to afford the fare forced me to walk through dangerous areas at bad times. I don't want others to go through my same experiences. Even if I have to pay more, I wish to make it easier for kids to use the bus.
Having zero fare for the youth would cut back on car trips, and enable them to go to library and such on own. And make it affordable for parents to transport younger children with them.
I'm 75 and the bus is essential to me and I appreciate it immensely
Overall, I think the idea of zero fair bus privileges is a good idea for youth. It was one of my favorite things growing up and gave me a lot of freedom in the summer. However in our community, to get anywhere on the buses takes her horrendous amount of time and is not really practical (Spokane south hill). This is too bad. I would love for our kids to use the bus more and I'm always looking at more environmental ways to travel
Thank you for your service
Thank you for all you do & for asking for input :-)
I work as a homeless liaison at a local school district. We do provide passes to teens but I would like to see it expanded to adults who are without transport or low income.
This year will be by sons first time using the bus for transportation and the bus fare will be an additional expense we aren't ready for.
My current 18 year old used the free STA pass benefit a few summers ago. If the pass hadn't been available, I would have given him the money for the bus rides.
N/A
I think this is a wonderful program that will make access to services more accessible to kids and families
in addition to providing safe transportation we are teaching our youth to use public transit - an environmental necessity for the future
My kids rode public transit to school from 7th grade on. It was an important step towards independence and I endorse efforts to do so in Spokane.
Thank you to the drivers for always making mw feel safe on the bus, especially in downtown after work traffic. They deserve more love and recognition, many take them fro granted and I appreciate them being so great at their jobs, and being friendly and reliable transportation. I prefer taking the bus to and from work, its less stressful and cheaper then paying of parking
Implement zero fares for all, let's grow STA!
This is a great opportunity to support youth access to their communities.
My son has a disability and would benefit from zero fare to increase his independence.
Safety and ease of navigation are important considerations to engaging more youth/families to utilize zero fare. Families and youth may choose other methods or simply stay home if they feel unsafe or if routes are too difficult for youth to navigate.
Great job working towards a better city!

15. Is there anything else you wish to tell STA?
Let's just make it zero fare for everyone. It's public transit. It should be free for the public.
This is wonderful!
This is a great way to expand STA services.
I am a single mom of two! So I am grateful and thankful. It helps me and my kids who are special needs!!! Thank you. Keep up the good work!!! God bless
I live at a house on 25th and bernard with commuter stop 144 at my house. We ride the bus, but other rich kids don't due to a stigma. My daughter rides the 43 or 4 to ferris even though we live in LC. She is treated as if she is poor. Make taking the bus downtown a life skill! For all income levels!
Zero fare for everyone
Zero fare for youth will help prevent isolation for youth who don't have access to other transportation. Also it will be essential for many students who will depend on STA for transportation to school.
Thank you to the ones who help when people are short.
This would be fantastic, my daughter loves taking the bus to the park work me!
Well should make public transportation free for everyone but especially for youth and we should find it by charging car drivers a fee. They are making our cities dangerous and wrecking our rides. They should subsidize our public transportation.
This will create incredible access for our teens. Larger cities have successful zero fare programs and Spokane should be added to that list!
Loved the Bloomsday Shuttle from Ferris!
Bus passes for those on fixed incomes should be reduced also
All youth need access to have the freedom to work, live and play. Please create a no fare program for all teens.
no-cost fares can equal freedom and opportunity for kids - I'm all for it!
With bus driver shortages is district 81, kid had to take the bus on several occasions while the dist only provided 2 months of passes. This would help our family tremendously
Thank you for your service.
Thanks for all you do!!
Thank you for the important work you do for our community.
Having free access to public transit is a safety enhancement for our children, allowing kids who need to leave a dangerous/unhealthy situation more opportunity and freedom to do so.
This would positively impact the homeless youth and low income families the most.
Zero fare youth programs create riders for life.
I'm a single mother on disability. Hard to pay for fees
I love the independence that bus-riding can promote in young children! Plus, riding public transportation helps us lessen the environmental impacts of our transportation choices and reminds us that the world is not a scary place.
Being a single mother I cant afford the bus fare everyday for all of my children and myself so it gets complicated trying to get everyone around let alone myself
I think teaching youth the importance of and using mass transit is so important and think zero fare (esp for low income) is great! Thank you!
My daughter used it to get to and from LC as a freshman. My next will need it next year!
We don't need STA in Spokane.
Even though my family and I may not use the bus, I think that it should be free for all students aged 0 to 18.

15. Is there anything else you wish to tell STA?
Zero cost would allow youth to travel the city without limits. I believe this would have a negative impact on communities because the younger population isn't mature enough to make good decisions. Having a fare at least sets some boundaries on how far/often they can travel.
Keep up the always improving service that you provide to our community! ♥
Our children have to ride the bus regularly for school since we are outside SPS attendance boundaries. This adds up quickly for three teenagers and has been surprisingly expensive up til now.
I work for a local school district. There are a significant number of unaccompanied homeless youth in our county who would be positively impacted by a zero fare policy. Your routes need to provide access to school buildings in all school districts especially Middle and High Schools.
Hi!
Even though no one in this household rides the bus, I think this is an excellent idea.
Thank you for considering this program. It will help so many families.
Busing has been a mess this year for school. Having STA available for the older kids would be very helpful!
We love the service you provide. Hubby buses to/from work, one child bused to/from high school, the other would like to. Thank you!
Expand. More routes More frequent runs
This is great for kids who have been in quarantine last summer to finally get out and explore the city and be social.
No one should have to pay to use public transit the way no one has to pay to use the library or parks.
This is a good idea
The free summer pass really helped us out a lot!! I barley make enough to pay the bills
All youth should ride for free.
please make it easier for middle school and high school students to ride for free so we dont have to wait so long for school buses
I never have cash and this makes is complicated. Honestly I bike commute and I use the bus sometimes to come up the hill, but there isn't always a direct route from downtown to the South Hill...when I am in a hurry.
We believe that the school district should contribute to the cost of bus passes for students, considering that the Durham bus schedule—at least this year—was completely inadequate and didn't get students to school in a timely or predictable manner.
The problems with the school busses this year have been severe. This would have been a wonderful solution when we were working around them being 4 hours late every Monday morning.
It would be a good idea for adults with kids to have free summer passes to depending on financial situation or on SSI
Please consider some safeguard in your mentor programs for young riders. Currently I do not feel safe allowing my young daughter (8) to ride alone or with our au pair. We have had issues with men following them off of the bus and harassing them on the bus.
Having youth riders promotes future ridership as kids are comfortable with the bus now and will use in the future.
If it were possible I would wish for public transit via city bus to be free to all AND run 24/7. Socialism benefits everyone.

15. Is there anything else you wish to tell STA?

I tend to walk or bike everywhere and use the car only for long-distance trips or hauling; otherwise I'd take the bus. My children walk to and from school and/or carpool and/or ride the school bus. Zero fare would encourage them to use the bus more for extracurriculars and recreation. A citywide zero fare for *all* youth would also help cultivate a new generation of riders who don't stigmatize the bus and learn to see it as a viable choice for transportation, not just something for those with no other options. This city desperately needs to be weaned off its single-passenger car habits.

My son rides the bus every day to school and it would be awesome to have this.

I would feel safer about having my younger (11 & 13) kids ride the bus if I knew that there would be safety protocols regarding homeless people

Please offer all youth the opportunity to use public transit for free.

This change will help our youth to both be more independent and to learn that public transportation is a more sustainable option for our world. My oldest child used the bus all the time. It was crucial for them.

With the bus shortages in the school district, this would replace the school bus and we would no longer have to pay to get our child to school on time

Keep on doing a EXCELLENT job!

Start a zero fare policy for seniors AND improve your service in the Valley

My family is older now, I am thinking about the younger families, this can be huge for them.

Good

As a parent with 5 children, it makes no sense to pay \$24 or whatever for a round trip bus ride for all of us when we have a vehicle available, but if the children were free it would definitely make it worth it to pay for my own bus fare in order to drive less. So maybe you would have more parents riding the bus and actually collect more fare?

Keep doing what you're doing!!

My children go to alternative schools where the school bus is not an option. We depend on STA to get the older ones to and from school, activities and appointments. The impact of them having zero fare would greatly benefit our family.

Implementation of zero-fare for youth will massively cut into STA's long term plans to expand routes to the east including Stateline, Post Falls, and Coeur d'Alene.

I pay to take my daughter back and forth to Dr. Appointments and it starts to get hard with the wallet

Good for kids I am 100% on board for this program

I don't drive and heavily rely on the bus to get me to and from work Monday-Friday. As summer approaches my children will need/want the freedom to go places alone and with me. If the bus fare is reduced or zero for youth more opportunities will be available to us as a family.

I am curious if there will be any upgrades to Service? Right now it's impossible to get out of my neighborhood of Lincoln Heights, to any destination on time. The #34 is always late, now the route is chopped that would take me from Lincoln Heights to Grocery Outlet on 3rd took 3 hours & \$20. Please reinstate that City Loop you took out. That was a poor decision. You could catch a bus anywhere & grab a connecting bus, now it's Stop, Wait, Wait Some More... I couldn't make it from Lincoln Heights to Division Y for a eye appointment on time... The 33 pulls out as the 34 pulls in. I don't understand...

The government has no role in funding public transportation. If it cannot survive as a private enterprise, the government needs to stop losing money on it every year.

15. Is there anything else you wish to tell STA?
Please don't add this to the list of things only very low income children can have. If there is an income cutoff, make it more than the federal poverty level. So many families are above the cutoff for low income programs, but are struggling due to increased housing and food expenses. I am a grandparent raising a grandchild. I am slightly above the income cutoff for things like free and reduced price lunches, but as a senior citizen, rising costs for rent and food are making things difficult, yet we don't qualify for any help. I don't have a car, so we depend on the bus, and sometimes there is no money for bus fare. Please, let the kids ride free. You will be teaching future riders that the bus is a great source of transportation.
Children need a safe and efficient way to get around. If the state is going to cover the cost (and then some) this seems like a win-win. There might be some people older than 18 that attempt to abuse it, but I have seen your drivers handle tough situations like this in the past. They always do a good job. Please move forward with this program for the summer and the future years to come. I truly believe it would benefit the Spokane area, create future bus riders, and help families who are financially burdened.
Paying 2dollar is a little spendy when not having any income. Also I believe when paying for the bus ride you receive a 2hr pass but it actually should be an all day pass. N if not paying fair then should be a one way trip
Nope
I'm a single G-ma raising a teenage boy w/ no car living in Airway Heights. We moved here in 2016. We used to do a lot more free activities when we lived in Seattle...like going to visit family & friends, the library, the park, farmers markets, museums, swimming, & exploring the city in summer. We are very limited now do to cost, because there are not a lot of low-income programs available to help for social purposes. So we don't go out a lot & walk where we can. When I lived in Seattle I had a disabled pass. I wasn't able to get it transferred here so I have to pay full fare. So transportation is a hardship for us.
Many children in the community would have more opportunities to participate in community events, activities, educational, social, work opportunities to e better themselves and the community
Please make this program as simple as possible, without means testing, so that all young people in our city know they can ride the bus free of cost & there's no further complexity for them or their families to dive into. Ensuring that young people aren't dependent on driving will be good for traffic safety and making sure kids can get around on their own. Let's keep it simple and maximally accessible. Also: please don't get rid of the cash farebox! Not everyone has a smartphone at hand. The cash option is still very important for our seniors and low-income neighbors.
This would help low-income families be able to get out of house together
I'm am employee and although my child rides free her extended family and friends do not. This will increase the opportunities for her to socialize and learn about navigation with her friends.
Yes . . . raise all fares sufficient to cover the full costs of the system, including capital costs. The people who ride the bus ought to be paying for it.
I am not a bus rider, but know many people who are. Transportation can be such a barrier for services that I'd be happy to see as many free and reduced fares as possible and I'm happy for my taxes to help.
Zero fare will provide expanded travel opportunities for kids and will increase support for STA over time as more people in the community become familiar with the service (it's a long range benefit to STA).
I don't think kids should get used to something for nothing. Have them pay something!
No
Zero fare for everyone, including youth

15. Is there anything else you wish to tell STA?
It is critically important to encourage youth to ride the bus in any way possible. Without doing this, they may never consider it a viable option, and be tied to a car. The national park service provides free entrance to 4th graders so they are able to connect to the parks. This connection is vital, be it parks or transit.
I'm 100% in support of providing zero fare accessibility to young folks in our community.
Bring on the bus 38 route. I'm super excited for that.
GET MORE NEWFLYERS!
Anyone using state benefits should also qualify for a discount. Bus passes have gone up and I'm afraid of them going up again. It's hard enough saving for a car.
Larger buses are needed Sunday morning mostly on rts 90 & 61
Implement digital ticketing inside the bus.
Paired with good routes to schools, this could help alleviate school bus shortages to help families reduce traffic on school days
Should implement in the 'zero fare for youth' bylaws that is no Such act into stroking their ego in entitlement, but rather essential values that's ethical, that teaches morals that 'if you don't work you don't eat. That where community that cares one way is, showing them that is providing free fare, for the youth that is productive (School work volunteer cultural/spiritual/religion the want). And for the youth that That don't fall into the above mentioned. esp Entitled Active wanna be criminals the not sures esp 10 dollar monthly pass. Take the opportunity for what we talk about How our kids should be How our kids should be This way we can show them. Because if the youth don't know then They won't have the proper know how.
Please add more direct routes from 5 mile to the Valley/Liberty Lake please!
I am in the process of teaching my youth how to ride the bus because being able to do so will give him a better sense of independence and freedom to participate in events in our city, which he is not able to do now since I work full-time. It would be a big stress reliever for me to know that this would not be an extra cost burden for me, if the pass was of no charge.
Make the buses run later to serve those commuters who work late at restaurants and bars or other entertainment jobs.
I think it would be a good idea for youths to show some form of identity to prove they can ride the bus for free
Off topic, but 24 hour bus service, more routes, and more frequent timetables would be my ideal. I do also like the new suggested fare schedule where people are automatically rolled to day passes after spending \$4 on fares in a single day.
Great program.
Kids have jobs but not a driver's license. With gas prices what they are it is very difficult & they would love to take the bus
Good bus :)
Keep up the great work
I believe 0-12 years of age should pay \$0, but kids 13-18 should pay a reduced fare (\$1 or similar).
We love you guys! Thanks for all you do!
Youth fare should be free! It will encourage community and more spending in the downtown sector
This would be very beneficial for all of my current students. Getting to school, getting to work and helping to take care of their families (grocery shopping, dr's appt's, multiple households, etc) Every fall, I dream of being able to tell my students they will get this wonderful opportunity.

15. Is there anything else you wish to tell STA?
STA routes should be widened across the city to provide reliable transportation for all residents to/from all areas of the city. Youth should be able to access these routes free of charge, especially considering most of the youth that access these routes are trying to get to/from school and do not have alternative options.
I work for Spokane Public Schools and I spend a lot of time searching for Bus Passes to get kids opportunities to events outside of school. If Zero-Fare was a possibility- more of my at-risk students who don't have transportation, might attend events that would get them excited about learning.
Ya'll ever thought of usin dem fancy pods like Morgantown?
please provide free bus transportation for all students who need to get to school - high school and college
I cannot wait until STA is viewed as more than just transportation for "low income people" and commuters to/from work. Making public transportation accessible for all will help us improve the view of this important service. Public Transportation for All!!!
PLEASE do zero fare transportation for SPS students!!!
If you are going to discontinue fare for youth , you might as well discontinue fare for all. How are kids supposed to learn responsibility with money and the value of a dollar when getting to and from work ? What happens when the child turns 19 and has to start paying fare when they have getting a free ride their entire childhood ? This is a bad idea all around and will have a huge negative impact in the long run .
I think zero fare should eventually be for everyone.
While I don't disagree with providing discounted or free fares to youth, my concern is that if it is free, does the transit system and its vehicles become a place to youth to loiter? If there can be some sort of program/public messaging effort to emphasize that "free fares" are a privilege and an investment in our youth (to get them to jobs, friends, other responsible obligations, etc.) and to please respect the privilege, then I'm all for providing free fares.
STA should provide discounted fare for low income people, no matter their age.
I think it will crowd the bus system & more troubled youth will be taking advantage of STA
If kids can get around easier workout burdening families that's a net positive. My neighbors have toddlers & at least one family is a single-car household with two parents, this would be great for them. I'd like to live in a place where older kids have free safe ways to get around independently and younger kids can easily go on errands with their families. Free child fare for everyone seems like a pretty easy way to make that happen. Oh! And new moms, who are at risk for post-partum depression & anxiety, which is worsened by physical & social isolation? This could help them get out of the house more without wrestling car seats! If STA can afford this I am ALL for making it happen.
I think youth should be allowed to ride the transit free!
It would be a boon to Spokane. It costs alot for my family to take the bus together.
I recently learned that fares make up like 6% of STAs entire budget. I imagine youth fares are a miniscule component of that already small number, this should be a no brainer. I advocate for all rides to be free, but youth being free is a great way to encourage life long transit users.
The most limiting factor for youth getting jobs, accessing services, and getting to school in Spokane is access to STA. I work with homeless youth at SPS and even they don't always qualify for free bus service. This limits their ability to access free supports and job access. Please! Free bussing for youth! A game changer for our most vulnerable and needy population. Thank you STA!
I won't be able to take my kids out as much when they're too old to ride free, I can't afford 3 monthly passes.
What are you doing about the drug use on buses? It's not safe for my kids to ride public transport if the drivers are being assaulted and drugs are being used on the bus

15. Is there anything else you wish to tell STA?
Fares should be free for all.
Great idea! I think free with adult is necessary.
This is a great idea. We need to do everything we can as a society to increase mobility for young adults.
I know kids in my neighborhood who use STA to get to school and school events. Zero fare in these hard times would be a welcome relief.
Start a \$3 daily pass day pay. \$4 does not make sense when \$2 per trip each way past 2 hours.
Thanks for considering this. Our lack of participation in recent programs and transit use in general are due to the ongoing pandemic.
As a single, low-income mom, I wish I could get assistance with a pass so our whole family could go places together.
Please pass this! Currently to go anywhere via bus for a day pass its 16 bucks I'm a single mom on a very tight budget that's alot to pay fir kids for just one day...this will help my family alot!!!!
I work at a youth center and zero fare for youth would make the city so much more accessible for young folks!
No

Title VI Equity Analysis

Proposed Zero Fare for Youth Policy Revisions

[Status]

6/16/2022



Spokane Transit assures nondiscrimination in accordance with Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act. For more information, see www.spokanetransit.com. Upon request, alternative formats of this information will be produced for people who are disabled. Please call (509) 325-6094 (TTY Relay 711) or email ombudsman@spokanetransit.com.

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Section I: Introduction

The Washington State legislature passed the nearly \$17 billion *Move Ahead Washington* transportation package on March 10, 2022; and it was signed into law by Governor Inslee on March 25, 2022. The *Move Ahead Washington* package included \$33.6 million in grant funding for the 2021-2023 biennium. Eligible transit agencies include public transportation benefit areas under Chapter 36.57A RCW.

To be eligible for transit support grants, transit agencies must:

- Adopt and implement a zero-fare policy for people 18 and under by Oct. 1, 2022. Agencies that adopt and implement a zero-fare policy after Oct. 1, 2022 will not receive 2022 supplemental budget funds and will be eligible for funds beginning in the 2025-2027 biennium.
- Certify annually that the agency has maintained its local sales tax authority for transit at or above Jan. 1, 2022 levels

This report documents STA's Title VI equity analysis of the proposed fare policy revision. Upon completion of this fare equity analysis, staff shall brief the Board of Directors prior to the Board's action(s). STA will keep this analysis on file and available for review by the Federal Transit Administration (FTA) and the general public.

The fare equity analysis was performed in accordance with the requirements specified in the Federal Transit Administration (FTA), Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients and STA's 2020 Title VI Program and the policies outlined in STA's Comprehensive Plan, *Connect Spokane, A Comprehensive Plan for Public Transportation*.

Fare Policy Revisions Objectives and Overview

The objective of the fare policy revision is to provide a zero fare for youth 18 and under. This change makes the Spokane Transit Authority eligible for the transit support grants as identified in the *Move Ahead Washington* transportation funding package.

Spokane Transit Authority (STA)

Description of Fleet and Services

Spokane Transit Authority is a regional public transportation agency providing a variety of transportation services, including fixed-route, Paratransit, and Vanpool service. In 2019¹ Spokane Transit's fixed route system provided 9,971,798 unlinked passenger trips and traveled 6,118,526 revenue miles. Paratransit provided 441,097 passenger trips and traveled 2,393,647 revenue miles. Vanpool provided 155,262 passenger trips and traveled 929,850 revenue miles.

STA's 2020 fleet includes 147 active fixed route coaches, 70 active Paratransit vans and 96 active vanpool vans. Fixed Route Bus Service operates 43 routes, 365 days a year. In accordance with the Americans with Disabilities Act (ADA), all vehicles are lift or ramp equipped.

Paratransit Service is operated by STA and its contractor for people who qualify under the eligibility requirements of the ADA. Paratransit service is provided within a defined service area, during the same hours and days as fixed route service and in compliance with applicable state and federal laws for service to people whose disability prevents them from using Fixed Route bus service. The directly operated Paratransit fleet is comprised of 70 vehicles, each with a capacity for up to 15 passengers. Contracted transportation supplements service during the early mornings, nights and weekends as well as augments capacity during weekdays.

Vanpool (Rideshare) Service augments STA's public transportation system through the assignment of passenger vans to vanpool groups. A vanpool group can be formed by a group of five to 15 people whose origin or destination is within the STA service area.

Areas Served

Areas served include cities of Airway Heights, Cheney, Liberty Lake, Medical Lake, Millwood, Spokane, and Spokane Valley and some unincorporated areas of Spokane County. Services include connections between downtown Spokane and the Spokane International Airport, major shopping malls, area colleges and universities, and Fairchild Air Force Base. Spokane Transit Authority (STA) operates within the designated Public Transportation Benefit Area (PTBA) which encompasses approximately 248 square miles of Spokane County which includes approximately 459,007 residents or 84.8 percent of the county population.

¹ Spokane Transit is providing 2019 NTD and fixed route service and maintenance data (unless otherwise noted) which is the last full year of reporting prior to COVID-19

STA's Title VI Policy Development

Title VI of the Civil Rights Act of 1964 (Title VI) requires public transportation providers that receive federal funds to operate services and programs in a non-discriminatory manner. Race, color, and national origin are protected classes under Title VI. Low-income populations are not a protected class under Title VI; however, the FTA requires transit providers to evaluate the impacts of any fare changes on low-income populations as well.

STA's Fare Change Minority Disparate Impact Policy and Fare Change Low-Income Disproportionate Impact Policy were developed with an extensive public outreach effort. Letters were sent to a wide range of Limited English Proficiency (LEP) and nonprofit organizations as well as community centers and government agencies in early 2013 and early 2014. A public hearing was held to gather public comments. The 2014 Title VI update and policies were adopted by the Spokane Transit Board of Directors in early 2014. These policies continue to serve the agency and were incorporated into the 2019 *Connect Spokane* update and the 2020 Title VI Plan.

Section II. Proposed Fare Policy

STA periodically evaluates its fare policy and fare structure. The last major review of the fare structure was conducted in 2016 and led to a fare increase. This policy revision is not proposing any fare increase, rather it will lead to a decrease in fare costs for riders between the ages of 13-18.

Fare Policy Revisions Overview

The fare policy revision would reduce the fare costs for riders 13-18 years of age from \$1.00/ride to \$0.00/ride, with an effective date of October 1, 2022.

Zero Fare for Youth

Table II-1 shows the current fixed route and paratransit fare rates. Table II-2 shows the proposed fixed route and paratransit fares that will be effective October 1, 2022.

Table II-1. Current Fixed Route and Paratransit Fares

Fixed Route and Paratransit Fares (currently in effect)

GENERAL PUBLIC Fare Type	Adult (1)	Reduced Fare (2)			Paratransit (3)
		Youth (Ages 6-18)	Student	Reduced Fare	
Two-Hour Pass / Cash	\$ 2.00	\$ 2.00	\$ 2.00	\$ 1.00	\$ 2.00
Day Pass	\$ 4.00	\$ 4.00	\$ 4.00	\$ 4.00	N/A
7-day Rolling Pass	\$ 17.00	\$ 17.00	\$ 17.00	\$ 17.00	N/A
31-day Rolling Pass	\$ 60.00	\$ 40.00	N/A	\$ 30.00	N/A
Monthly Pass (4)	N/A	N/A	\$ 52.00	N/A	N/A
Paratransit Monthly Pass	N/A	N/A	N/A	N/A	\$ 60.00
Summer Youth Pass (5)	N/A	\$ 60.00	N/A	N/A	N/A
Shuttle Park (6)	\$ 40.00	N/A	N/A	N/A	N/A

(1) Up to three children under age six ride free with an adult, youth, student, reduced fare or paratransit passenger - children under age six are not permitted to ride unaccompanied

(2) Reduced Fare programs require verification of eligibility.

(3) Personal Care Assistant (PCA) rides free on Paratransit or Fixed Route with paid paratransit rider (needs no identification, however, the person with whom they are traveling must have "PCA" on their ADA paratransit identification card)

(4) Monthly Student Pass is priced as a 31-day adult pass with discount applied, subject to enrollment and verification by STA in accredited educational program

(5) Three-month youth pass valid June through August (currently piloted at no cost to rider)

(6) Includes parking at a designated parking lot, as stipulated in the Shuttle Park pass agreement

Table II-2. Proposed Fixed Route and Paratransit Fares

Fixed Route and Paratransit Fares (effective with fare collection system implementation)

GENERAL PUBLIC Fare Type	Standard Fare (1)	Reduced Fare (2)					Paratransit (3)
		Rider's License: Category A (Ages 6-12)	Rider's License: Category B (Ages 13-18) (7)	Student	Honored Rider	Stars & Stripes	
One Ride (4)	\$ 2.00	Zero Fare	Zero Fare	\$ 2.00	\$ 1.00	\$ 1.00	\$ 2.00
Farecapping - Daily (5)	\$ 4.00	N/A	Zero Fare	\$ 4.00	\$ 2.00	\$ 2.00	\$ 4.00
Farecapping - Monthly (6)	\$ 60.00	N/A	Zero Fare	\$ 48.00	\$ 30.00	\$ 30.00	\$ 60.00
7-day Rolling Pass	\$ 17.00	N/A	N/A	N/A	N/A	N/A	N/A
Summer Youth Pass (7)	N/A	N/A	Zero Fare	N/A	N/A	N/A	N/A
Shuttle Park (8)	\$ 40.00	N/A	N/A	N/A	N/A	N/A	N/A

GROUP SALES (9)			
Fare Type	Standard Fare (1)	Reduced Fare (2)	Paratransit (3)
Two-Hour Pass	\$ 2.00	\$ 1.00	\$ 2.00
Day Pass	\$ 4.00	\$ 2.00	\$ 4.00
7-day Rolling Pass	\$ 17.00	N/A	N/A
Monthly Pass	N/A	N/A	\$ 60.00
31-day Rolling Pass	\$ 60.00	\$ 30.00	N/A

(1) Up to three children under age six ride free with an adult, youth, student, reduced fare or paratransit passenger - children under age six are not permitted to ride unaccompanied

(2) Reduced Fare programs require verification of eligibility.

(3) Personal Care Assistant (PCA) rides free on Paratransit or Fixed Route with paid paratransit rider (needs no identification, however, the person with whom they are traveling must have "PCA" on their ADA paratransit identification card)

(4) Allows for travel up to two (2) consecutive hours after initial validation

(5) Maximum fare charged per day when paid with a smart card or mobile app

(6) Maximum fare charged per calendar month when paid with a smart card or mobile app

(7) Through the Washington State Transit Support Grant, all Youth Fares to Age 18 will be at no-cost to rider so long as the Transit Support Grant is in place. If the Transit Support Grant is rescinded or not renewed, Youth Fares will be reinstated at their previously approved levels

(8) Includes parking at a designated parking lot, as stipulated in the Shuttle Park agreement

(9) Limited use fare types available for quantity purchases only and not available to the general public

Section III. Fare Equity Analysis

Title VI of the Civil Rights Act of 1964 requires public transportation providers that receive federal funds to operate services and programs in a non-discriminatory manner. Race, color, and national origin are protected classes under Title VI.

To fulfill the requirements of Executive Order 12898 and DOT Order 5610.2(a) on Environmental Justice, FTA requires that an impact analysis be conducted to identify any disproportionate burdens to low-income populations that would occur as a result of a major service or fare change. Low-income populations are not a protected class under Title VI. However, Chapter IV-18 of the Title VI Circular states that “transit providers should take steps to minimize or mitigate impacts (for this population) where practical. The provider should also describe alternatives available to low-income passengers affected by service changes.”

STA’s Title VI policy, adopted in early 2014, identifies how STA assesses fare changes, as well the disparate impact and disproportionate burden that could potentially result from changes to fare policy.

Fare Change Policy

STA evaluates fare changes to ensure fare increases do not disproportionately negatively impact a class protected under Title VI.

Minority Disparate Impact Policy

If a fare change affects fare categories or payment methods used disproportionately by minority populations (10% or greater than the overall population), a fare change disparate impact exists and the impacts will be assessed and evaluated for mitigation.

Low-Income Disproportionate Impact Policy

If a fare change affects fare categories or payment methods used disproportionately by low-income populations (10% or greater than the overall population), a fare change disproportionate burden exists and the impacts will be assessed and evaluated for mitigation.

Zero Fare for Youth Analysis

Zero Fare for Youth

STA is introducing a zero fare for youth, ages 13-18, to complement the zero fare for riders 12 and under, STA wanted to know the answers to two questions:

1. Does this fare change require a fare equity analysis? And if so
2. Does this result in a disparate or disproportionate impact?

1. Does this fare change require a fare equity analysis?

Looking at the general STA *Fare Change Policy*, the policy clearly identifies “fare increases” as the concern for potentially disproportionate impacts on Title VI protected classes. This action is not a fare increase, and using this policy, it can be concluded that **a fare equity analysis is not required.**

However, neither the *Minority Disparate Impact Policy* or the *Low-Income Disproportionate Impact Policy* make the same distinction regarding only fare increases, so this memo will explore further the question of “does this result in a disparate or disproportionate impact?” using what little data is currently available.

2. Does this result in a disparate or disproportionate impact?

Figures III-1 through Figure III-3 illustrate the distribution of the density of impacted populations (persons/acre), located within a ½ mile radius of an existing bus line. Figure III-4 is an additive density map, showing the highest locations of youth + minority + low-income populations. While not allowing STA to draw any definite conclusions, the distributions are informative.

Figure III-1: Map of Minority Density

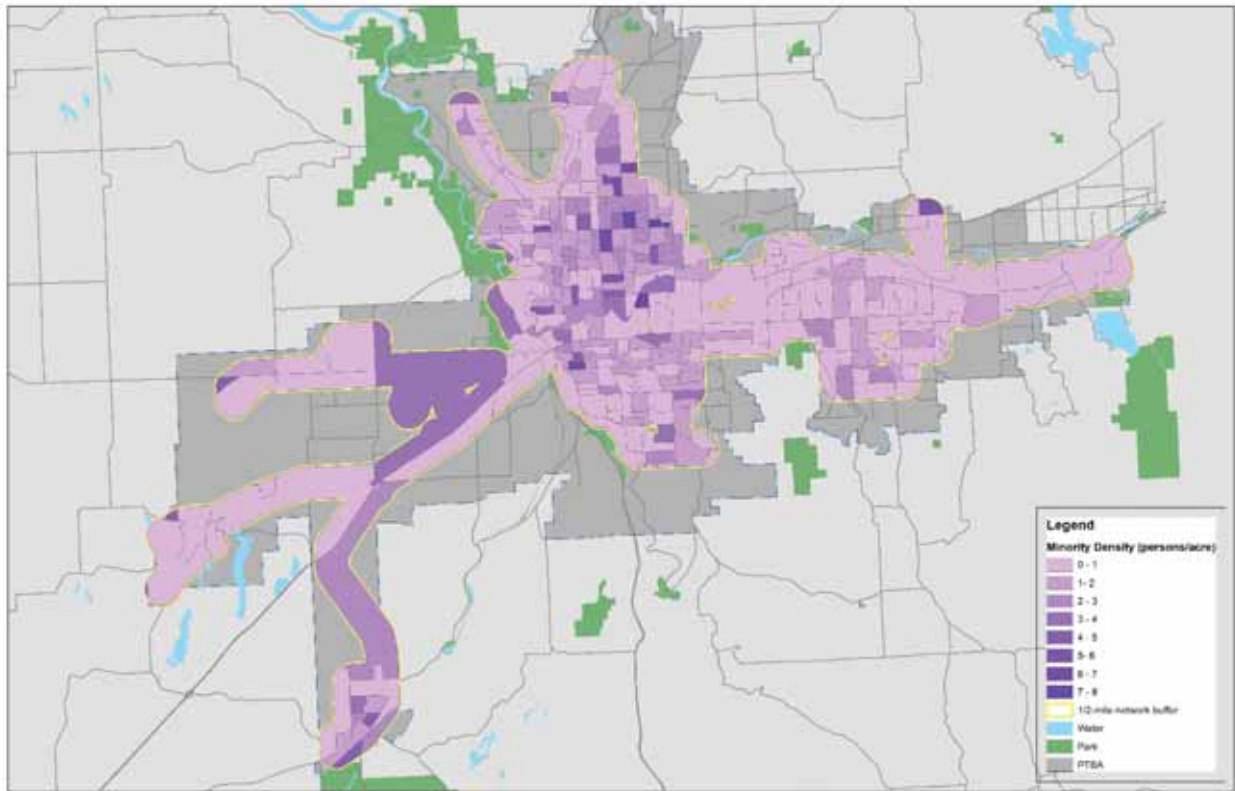


Figure III-2: Map of Poverty Density

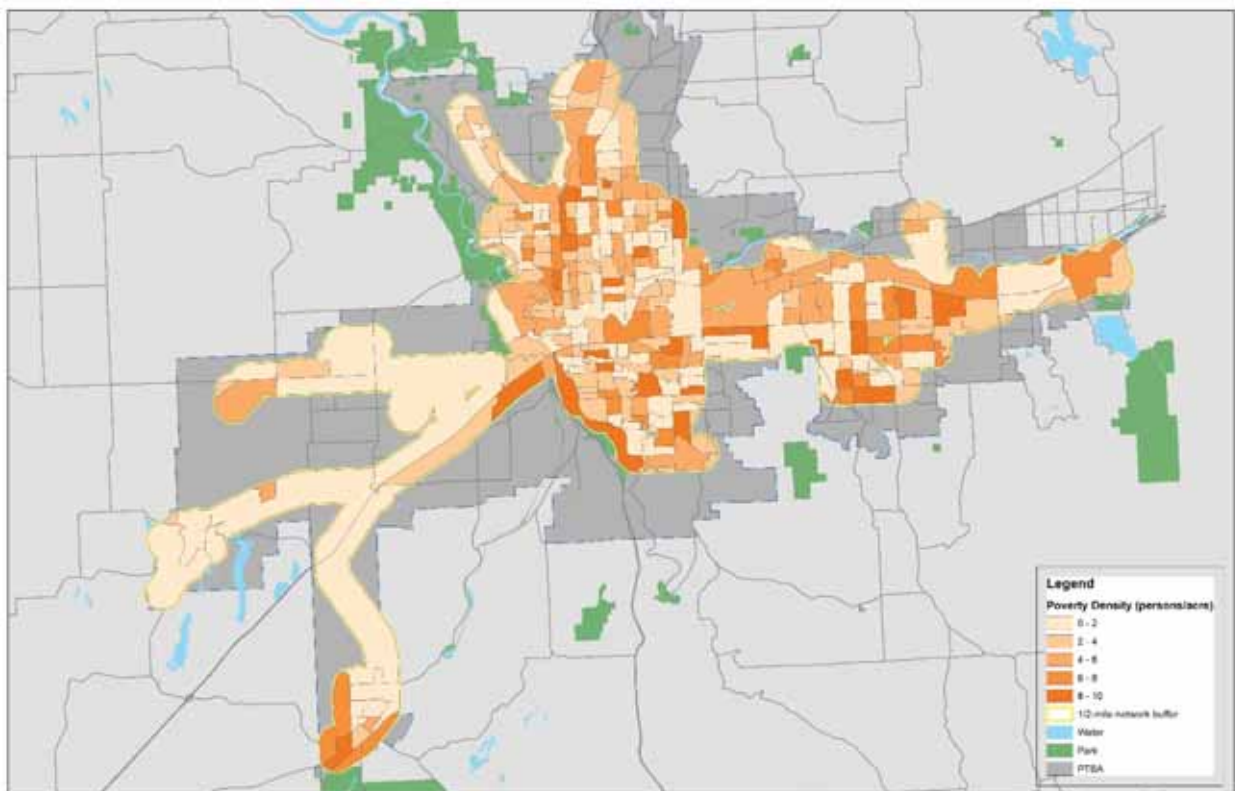


Figure III-3: Map of Youth Density

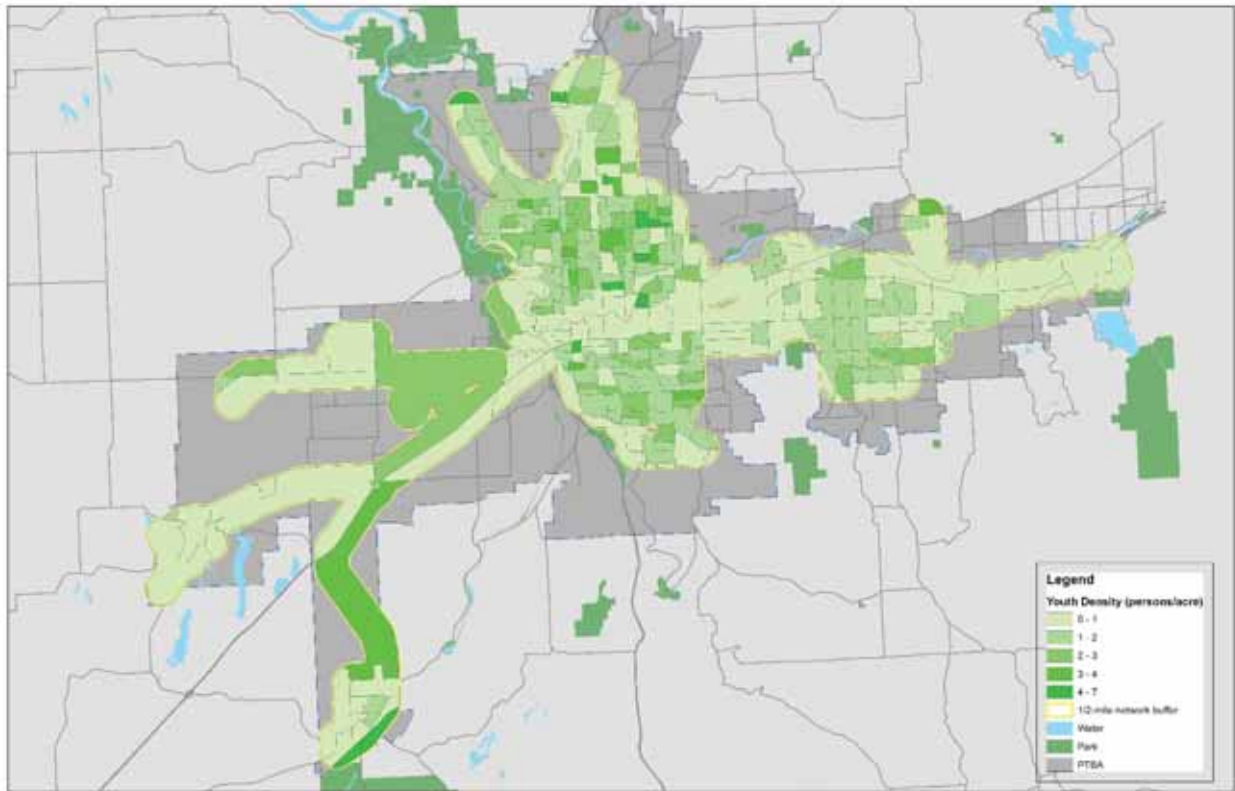
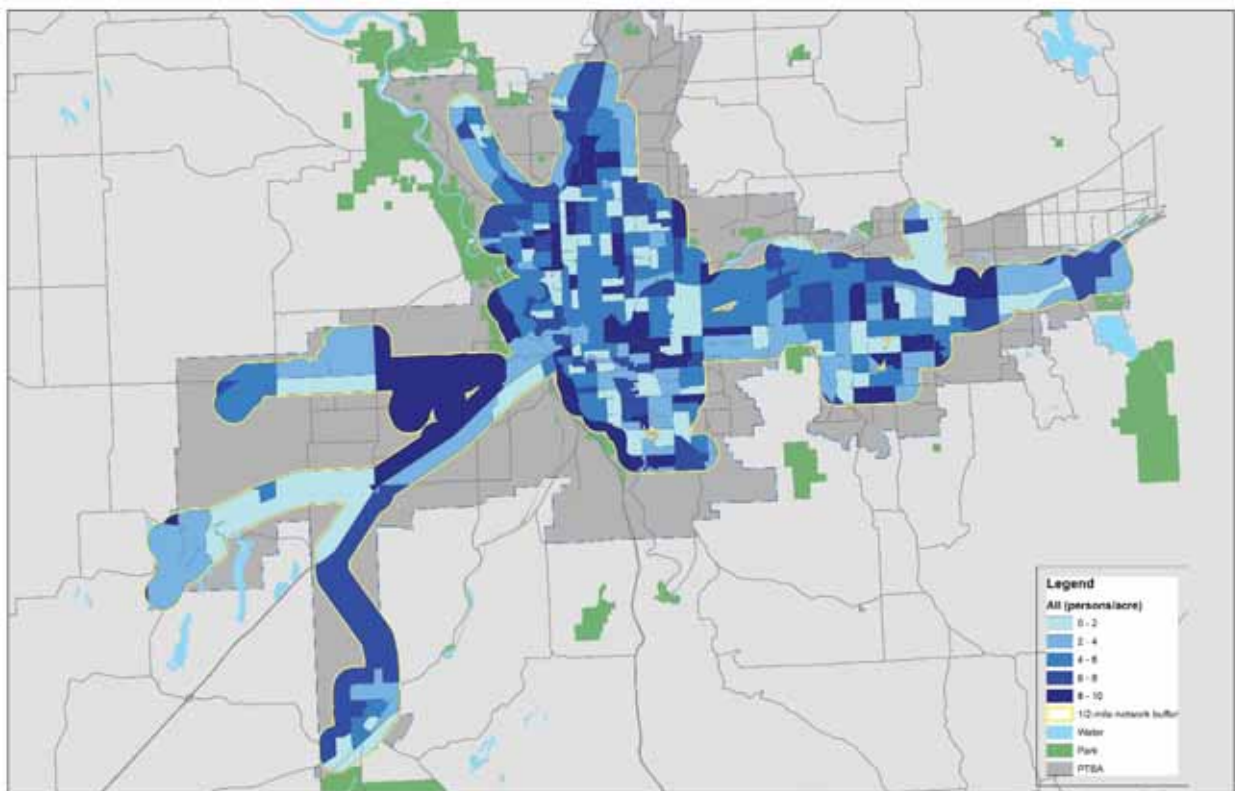


Figure III-4: Map of Impacted Population Density



The 2018 Rider Survey STA conducted was statistically significant, and while the youth sample sizes were small, it provides insight into the use of the current Youth Pass by minority riders, low income riders, and all riders.

Table III-1: Fare Payment by Minority Youth, Low-Income Youth, and All Youth

Fare Medium	Minority % Use	Low-Income % Use	Overall Population % Use	Title VI Threshold	Disparate Impact (DI) / Disproportionate Burden (DB)
Youth Pass	5.92%	5.41%	5.1%	4.59%	DI – NO DB - NO

The 2020 Rider Survey was a mail-in survey that was not statistically significant. King County Metro used regional household travel survey data from 2017 and 2019 to conduct their analysis. The Spokane Regional Transportation Council (SRTC) just concluded their survey collection, and results will be available in the Fall. STA will review the data available from that survey and re-visit this analysis at that time.

Summary

STA evaluated the proposed zero fare for youth and determined there was no evidence of disparate impact on minority households or disproportionate burden on low-income households.

Table III-2: Summary of Fare Equity Analyses

Policy	Zero Youth Fare
Disparate Impact	NO
Disproportionate Burden	NO

STA will return and update this analysis once the data from the 2022 SRTC Household Travel Survey becomes available.

Appendix E



2022 Service Change Proposal Title VI Equity Analysis Final Report

March 2021

EXECUTIVE SUMMARY

Spokane Transit Authority (STA) is in the process of evaluating a proposed service change planned for implementation in 2022. This service change includes several changes related to service span, service frequency, and route alignments to improve transit service throughout the service area and to realign service to better integrate with the City Line Bus Rapid Transit route, scheduled to begin operations in 2022. In accordance with Title VI of the Civil Rights Act, this service change is evaluated to ensure that any impacts are equitable and there are no Disparate Impacts or Disproportionate Burdens to minority or low-income populations.

According to STA's Title VI Policy, each route is evaluated to determine whether it is classified as a minority route or a low-income route based on the population and demographics of the surrounding census tracts. Routes that are designated as minority or low-income routes and result in a service reduction are considered to create Disparate Impacts and Disproportionate Burdens, respectively. All routes that were classified as minority and/or low-income and were altered as a part of this proposed service change are shown in Figure 1.

Figure 1 Change in Annual Trips by Route Classification

Route	Classification	Change in Trips	% Change in Trips
Route 26	Minority & Low-Income	-	-
Route 27	Minority & Low-Income	7,990	37%
Route 28	Minority & Low-Income	-	-
Route 29	Minority & Low-Income	-19,110	-100%
Route 32	Minority & Low-Income	-	-
Route 34	Minority & Low-Income	-	-
Route 39	Minority & Low-Income	-19,925	-100%
Route 42	Minority & Low-Income	-17,870	-100%
Route 60	Minority & Low-Income	-	-
Route 61	Minority & Low-Income	2,125	11%
Route 63	Minority	-	-
Route 94	Low-Income	-	-

Route 29, Route 39, and Route 42 are the only such routes that both experience a reduction in service in this proposed service change and are classified as minority and/or low-income routes. The STA Title VI Program policy states that Disparate Impacts and Disproportionate Burdens would result for all three of these routes. However, this does not account for the addition of new routes that continue providing service in the area. All three of these routes are proposed to be removed from service and entirely or partially replaced by a combination of the City Line, a new Route 14, and a new Route 38.

A further analysis at the census tract level identifies the change in the annual number of trips operating within each census tract served by the three removed routes. This analysis shows that all census tracts currently served by these routes would have improved transit service in the service proposal. Thus, any potential Disparate Impact or Disproportionate Burden associated with Route 29, Route 39, and Route 42 would be mitigated and there are collectively no Disparate Impacts or Disproportionate Burdens under the proposed service change.

INTRODUCTION

Title VI of the Civil Rights Act of 1964 ensures that “no person in the United States shall, on the basis 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.” STA has committed to the Federal Transit Administration (FTA) objectives set forth in circular 4702.1B through their Title VI Program and Comprehensive Plan. These objectives work to ensure that FTA-assisted benefits and related services are made available and are equitably distributed without regard to race, color, or national origin.

In Fall of 2016, voters approved funding for *STA Moving Forward*, Spokane Transit Authority's 10-year plan for more and better transit. Many projects have already been completed, including expanded night and weekend service, the opening of the West Plains Transit Center, and the start of four new routes.

STA is now engaged in planning for service improvements that are programmed and funded for 2022. Some of these improvements include:

- Expanded Hillyard and Northeast Spokane routes
- Implementation of the Central City Line (Bus Rapid Transit Route)

These improvements were developed through an analysis of the local market and existing services, as well as an extensive outreach process with riders and community stakeholders. Using this information, a Preliminary Service Change Proposal was developed and refined to create a single Draft Recommendation for these service improvements. The elements of this Draft Recommendation will be examined as part of this Equity Analysis.

Under this Draft Recommendation service change proposal, all census tracts currently served by STA will continue to receive fixed-route transit service. This Equity Analysis focuses primarily on how changes in STA service differently affect communities characterized by particular demographics. The income and race, as reported by the 2019 American Community Survey, of individuals within the service area was examined to determine whether the proposed service changes would disproportionately impact classes protected by Title VI. Specific focus was placed on identifying whether areas with disproportionately high low-income and/or minority residents would see significant service reductions under the Draft Recommendation service change.

Data and Thresholds

For the Draft Recommendation service change, this analysis measures the impacts of recommended STA service changes on low-income and minority communities by comparing the annual number of trips accessible within the September 2020 network to those accessible within the proposed 2022 network. Data concerning these communities were obtained by way of the 2019 American Community Survey (ACS).

Service Area

Per the STA Title VI Policy, any census tracts partially or completely contained within the Public Transportation Benefit Area (PTBA) boundary is considered a part of the service area. In addition to this definition, a ½ mile buffer around STA's existing 2020 fixed-route network and the recommended 2022 network were created. These buffers, considered a comfortable walk to transit by the FTA, were then overlaid on the census tracts partially or entirely within the PTBA

boundary to represent access to transit service at the census tract level for a supplemental analysis.

Demographic Data: Income

The FTA defines individuals who reside in households where total household income is equal to or less than the ACS poverty level as “low-income.” The following table (Figure 2) shows the poverty guidelines for 2019.

Figure 2 Poverty Guidelines for 2019

Persons in Family/Household	Poverty Guideline
1	\$12,490
2	\$16,910
3	\$21,330
4	\$25,750
5	\$30,170
6	\$34,590
7	\$39,010
8	\$43,430
For families/households with more than 8 persons, add \$4,420 for each additional person.	

Source: U.S. Department of Health & Human Services, 2019

For the 2019 ACS, household income data were collected. These combined characteristics were then assessed against the appropriate poverty threshold, depending on household size, to render a number of persons within each census tract that would be considered “low-income” according to the FTA definition. This number was then compared to the total population resulting in a percentage of population classified as “low-income” for each census tract.

Demographic Data: Race

In an effort to calculate a percentage of census tract population that identifies as a racial minority, the 2019 ACS was again consulted. Self-identified racial composition is reported via the ACS on an individual, rather than household, basis. For the purpose of this equity analysis, individuals who identified as any race other than White were considered minorities. The number of individuals per census tract who identified as minorities was assessed against the total population to render a percent minority population for each census tract.

Census Tract Classification

All census tracts within the STA service area were classified as representing one of the following: minority, low-income, neither or both. A census tract would receive the minority classification if its proportion of minority residents was 10% higher than the average minority proportion for the entire service area. The same is true of each census tract's proportion of resident's who are low-income. If a census tract's population was above both the thresholds for minority and low-income proportions, then it was classified as “both;” the opposite rendered a classification of “neither.” The service area average proportions for minority and low-income populations and respective

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impact and burden thresholds are shown below in Figure 3. The number and percent of census tracts in the service area falling into each classification are shown below in Figure 4 and are displayed on the map contained in Figure 5.

Figure 3 2019 Low-Income and Minority Classification Thresholds

Minority		Low-Income	
Service Area Average	Impact Threshold	Service Area Average	Burden Threshold
12.8%	14.1%	13.4%	14.7%

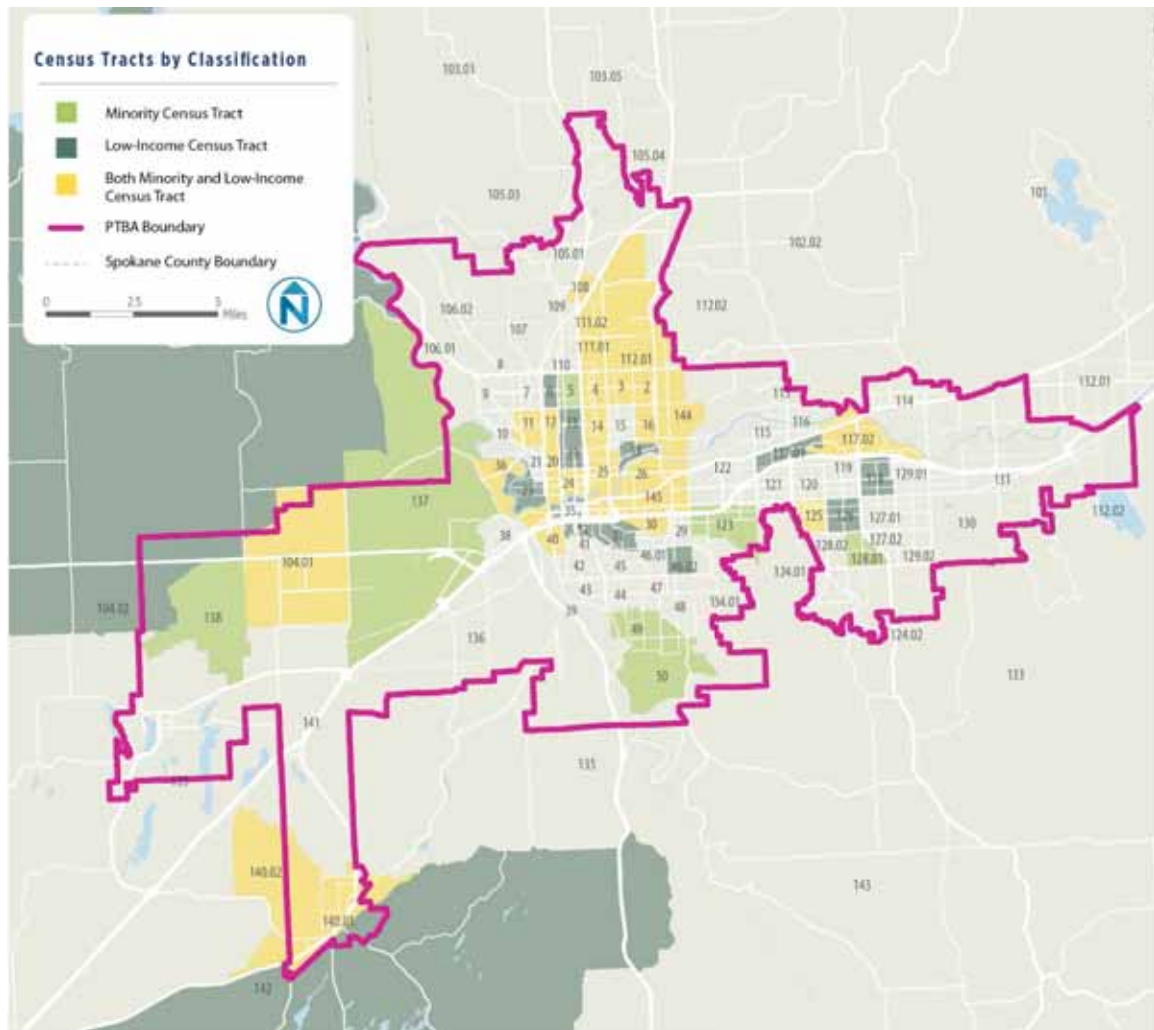
Source: US Census Bureau, American Community Survey 2019

Figure 4 Census Tract Classifications

Minority	Low-Income	Both	Neither
7 (7%)	14 (14%)	25 (26%)	52 (53%)

Source: US Census Bureau, American Community Survey 2019

Figure 5 Census Tracts by Minority and Low-Income Classification



Disparate Impact and Disproportionate Burden Threshold

In accordance with FTA guidelines, the following criteria for defining the disparate impact and disproportionate burden thresholds were used in this analysis:

- **Disparate Impact** – When a major service change impacts a census tract with a minority population that exceeds the average minority population of the service area by 10% or more, a disparate impact exists and the impacts will be assessed and evaluated for mitigation. To determine if a disparate impact exists, each route impacted is analyzed to determine the percentage of minority population along that route. This is done by adding all of the census tracts along that route.
- **Disproportionate Burden** – When a major service change impacts a census tract with a low-income population that exceeds the average low-income population of the service area by 10% or more, a disproportionate burden exists and the impacts will be assessed and evaluated for mitigation. To determine if a disparate impact exists, each route impacted is analyzed to determine the percentage of low-income population along that route. This is done by adding all of the census tracts along that route.

These thresholds are defined in STA's Impact Policy for Major Service Changes (and Disproportionate Burden Policy), which are included in STA's current Title VI Program.

Route Classification

In accordance with STA's Title VI Program, all routes were analyzed to determine if they were considered a minority or low-income route by evaluating the combined proportion of minority and low-income populations within census tracts adjacent to each route. The results of this analysis for each route in the existing STA system is shown in Figure 6 with routes proposed to be altered under the service change proposal identified in bold. Minority and low-income classified routes are also displayed in the maps contained in Figure 7 and Figure 8, respectively.

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Figure 6 **Route Classifications**

Minority Only Routes	Low-Income Only Routes	Both Low-Income & Minority Routes	Neither Low-Income Nor Minority Routes
<ul style="list-style-type: none"> ▪ Route 62 ▪ Route 63 	<ul style="list-style-type: none"> ▪ Route 23 ▪ Route 45 ▪ Route 90 ▪ Route 94 ▪ Route 173 ▪ Route 190 ▪ Route 662 	<ul style="list-style-type: none"> ▪ Route 11 ▪ Route 12 ▪ Route 20 ▪ Route 21 ▪ Route 25 ▪ Route 26 ▪ Route 27 ▪ Route 28 ▪ Route 29 ▪ Route 32 ▪ Route 33 ▪ Route 34 ▪ Route 39 ▪ Route 42 ▪ Route 60 ▪ Route 61 ▪ Route 64 ▪ Route 66 ▪ Route 67 ▪ Route 68 ▪ Route 663 ▪ Route 664 	<ul style="list-style-type: none"> ▪ Route 4 ▪ Route 22 ▪ Route 43 ▪ Route 74 ▪ Route 95 ▪ Route 96 ▪ Route 97 ▪ Route 98 ▪ Route 124 ▪ Route 144 ▪ Route 172 ▪ Route 633

Source: US Census Bureau, American Community Survey 2019

Figure 7 Existing STA Routes by Minority Classification

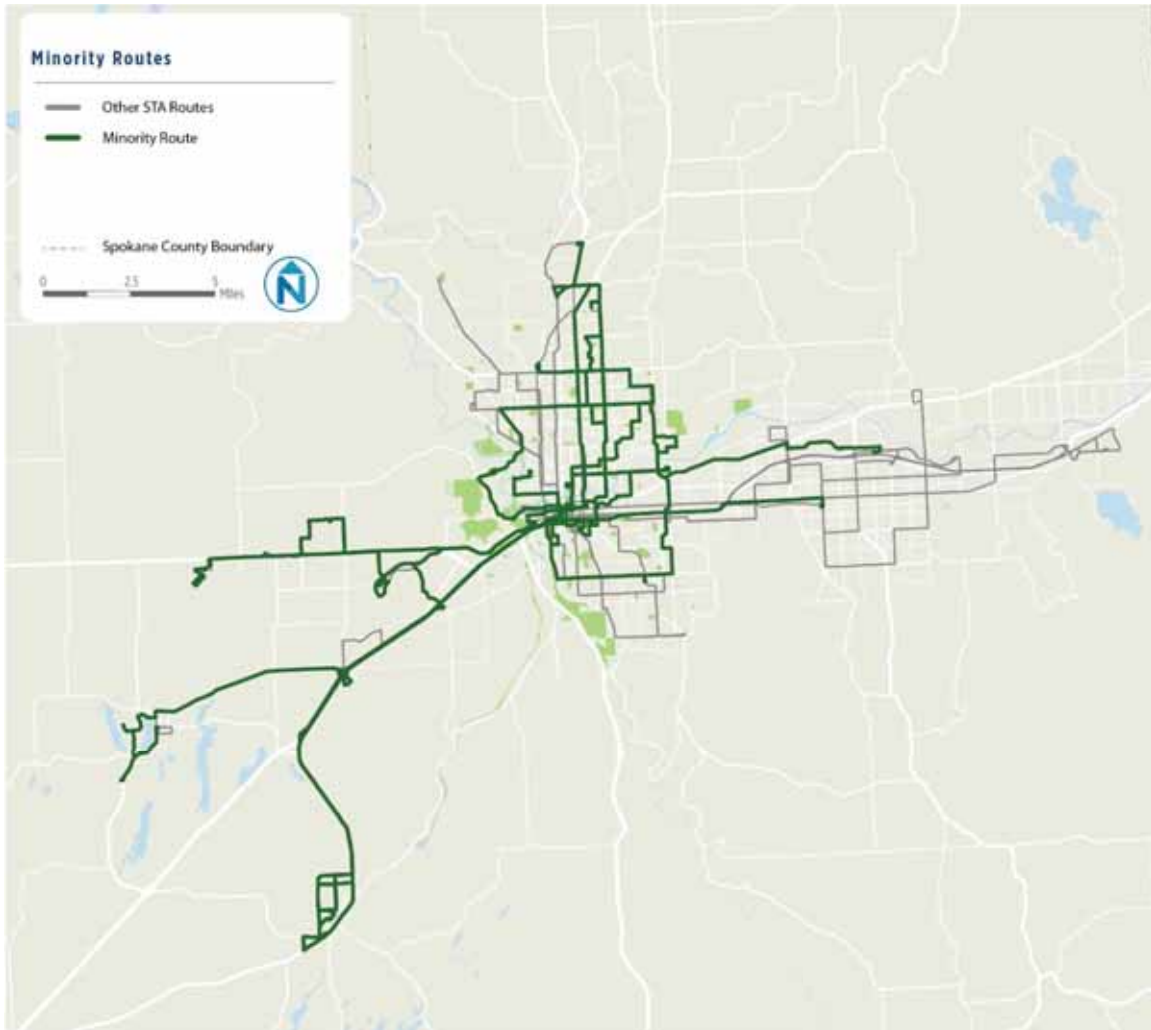
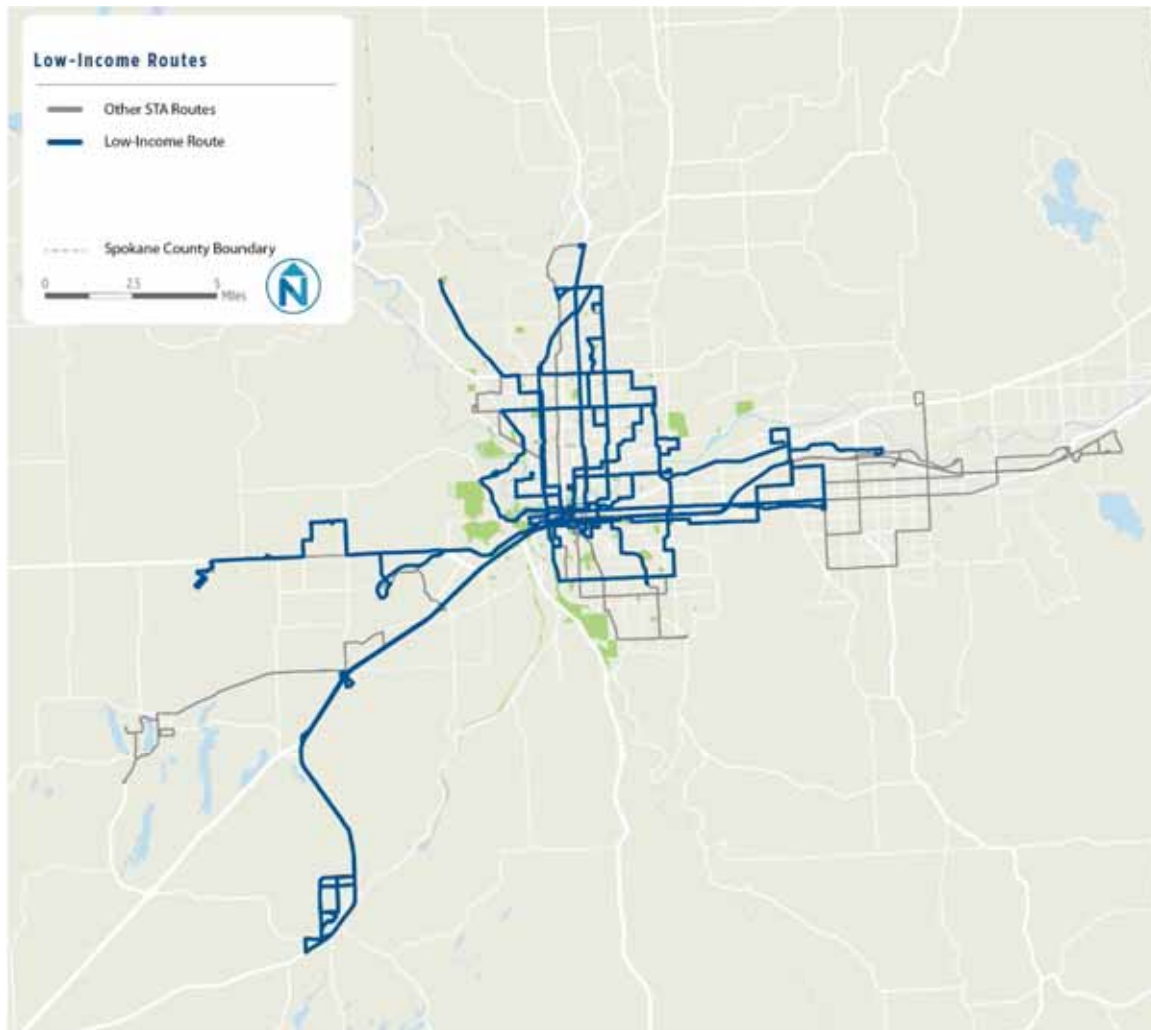


Figure 8 Existing STA Routes by Low-Income Classification



SERVICE ANALYSIS

Determining Service Increase or Decrease

To calculate existing service levels, each existing route's total number of annual trips was used. The annual trips generally reflect the number of times a rider will be able to access transit from a given location. The annual trips for each route in the 2020 and recommended 2022 networks were then compared to determine the change in service at the route level. Approximately, 21% of routes would see an increase in service, including new routes added to the system, and 10% of routes would have decreased service, including routes that are eliminated from service (Figure 9). In many of these cases, new routes or existing routes are revised to continue serving areas with removed or decreased service.

In addition to this analysis at the route level, each census tract within the service area was also assigned the sum of the total annual trips of all routes whose ½ mile buffer passed through it. This was done for both the 2020 and recommended 2022 networks. The proposed annual trips

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figure was then subtracted from the existing annual trips to determine the change in service: increased service, decreased service, or no change. Approximately 67% of census tracts served under the 2022 proposed network will experience an increase in STA service under the recommended service plan. Around 20% of census tracts served by the proposed network will experience decreased STA service. Figure 10 and Figure 11 show areas where service is proposed for removal and routes categorized by the change in annual trips, respectively.

Figure 9 Service Change Overview

Service Change Category	Census Tracts in Service Area	Routes
Increased Service	66 (67%)	11 (21%)
No Change in Service	13 (13%)	36 (69%)
Decreased Service	19 (20%)	5 (10%)

Figure 10 Existing STA Service Proposed for Removal

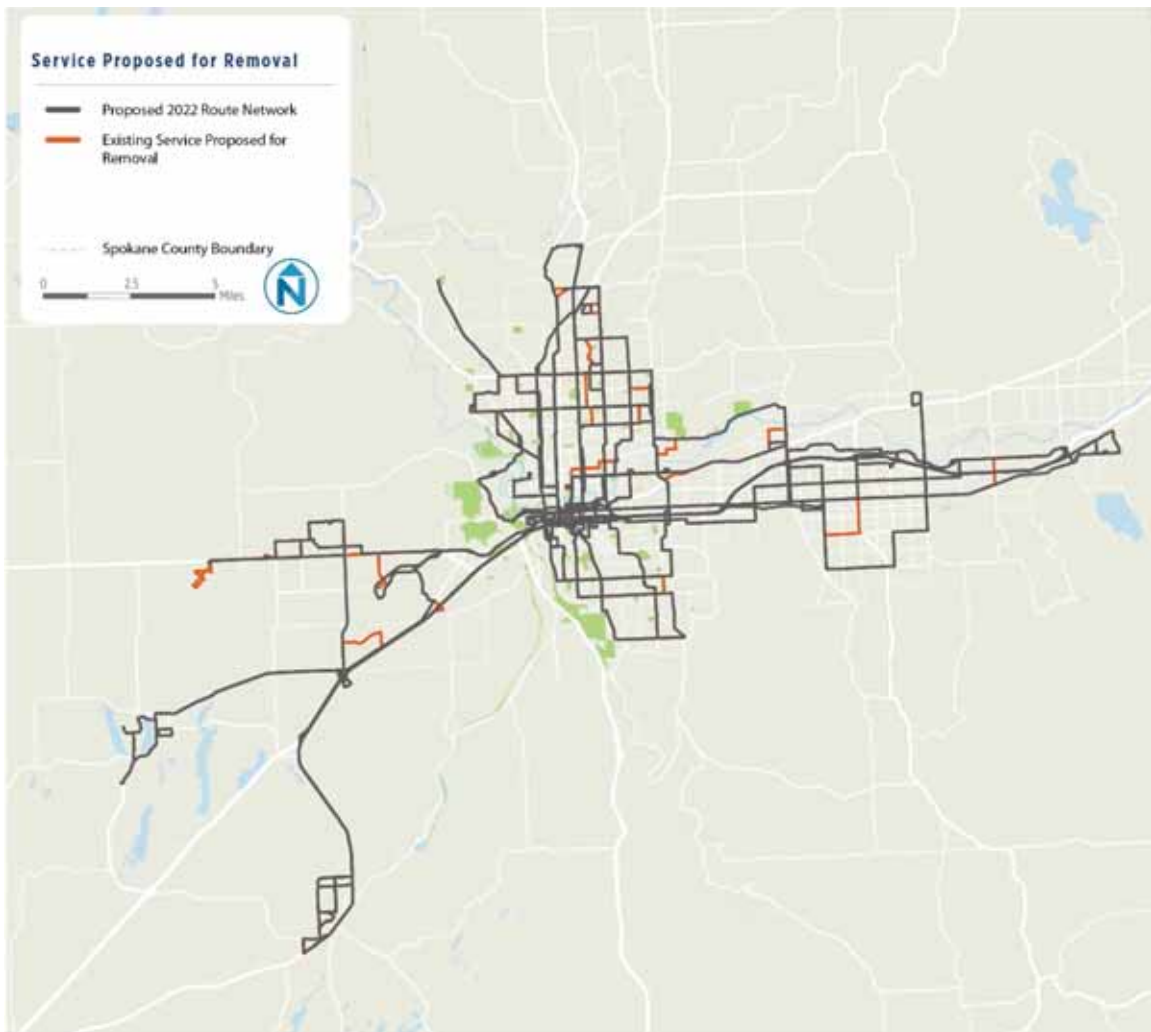
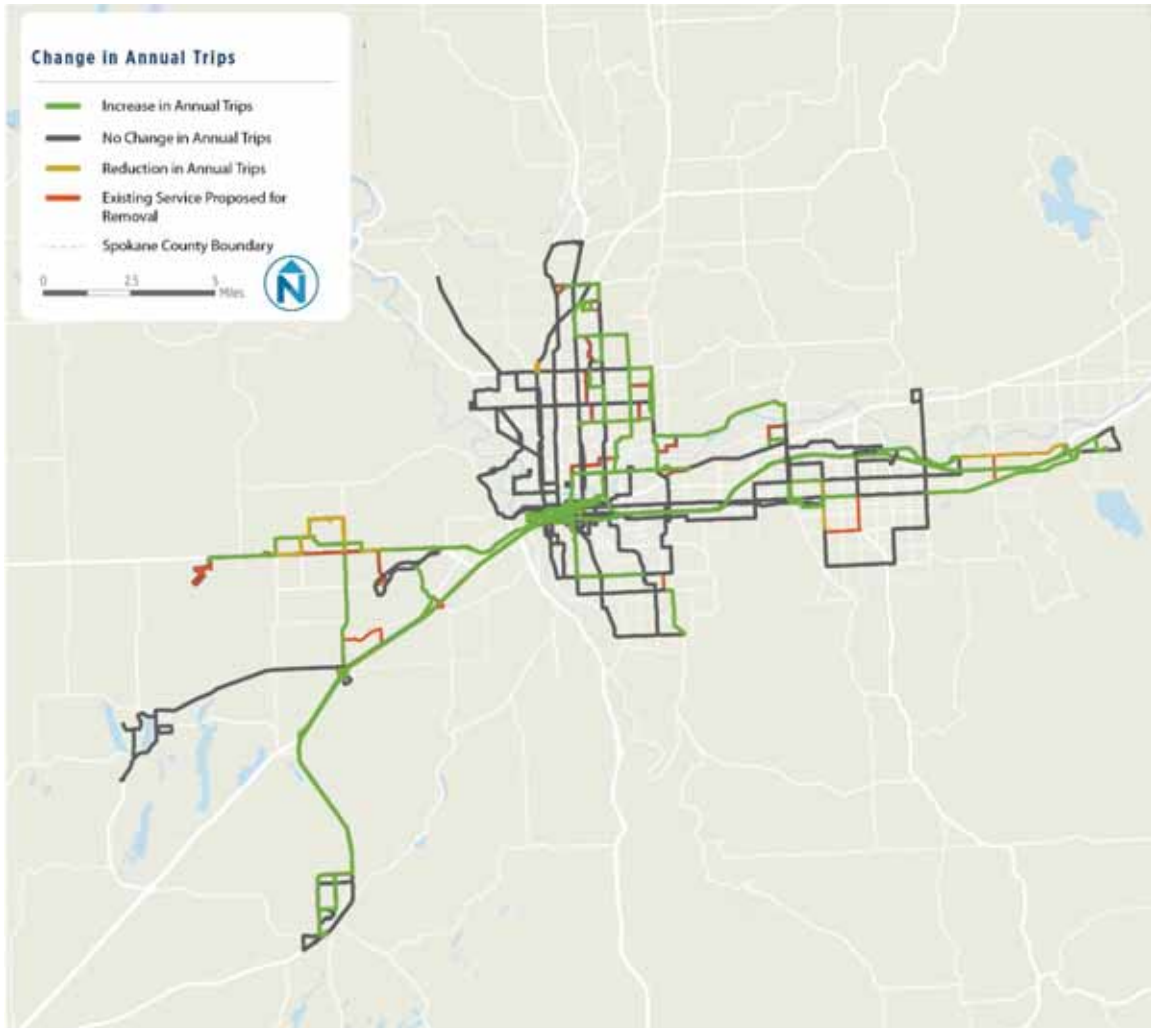


Figure 11 Change in Annual Trips from 2020 to 2022 – STA Network by Route



CHANGE IN SERVICE ANALYSIS

The 2022 proposed network and service plan include changes to route alignments, service span, and service frequency to provide faster, more direct service, and to realign or remove redundant service to better align with the implementation of the City Line. In cases where routes are removed and replaced with other services, particularly the City Line, census tracts may see an increase in annual trips. The change in trips for all minority and low-income routes evaluated as a part of this service change is shown in Figure 12. Routes categorized by service change are shown overlaid with minority and low-income classified census tracts in Figure 13.

Figure 12 Service Change by Minority and Low-Income Routes

Route	Classification	Change in Trips	% Change in Trips
Route 26	Minority & Low-Income	-	-
Route 27	Minority & Low-Income	7,990	37%
Route 28	Minority & Low-Income	-	-
Route 29	Minority & Low-Income	-19,110	-100%
Route 32	Minority & Low-Income	-	-
Route 34	Minority & Low-Income	-	-
Route 39	Minority & Low-Income	-19,925	-100%
Route 42	Minority & Low-Income	-17,870	-100%
Route 60	Minority & Low-Income	-	-
Route 61	Minority & Low-Income	2,125	11%
Route 63	Minority	-	-
Route 94	Low-Income	-	-

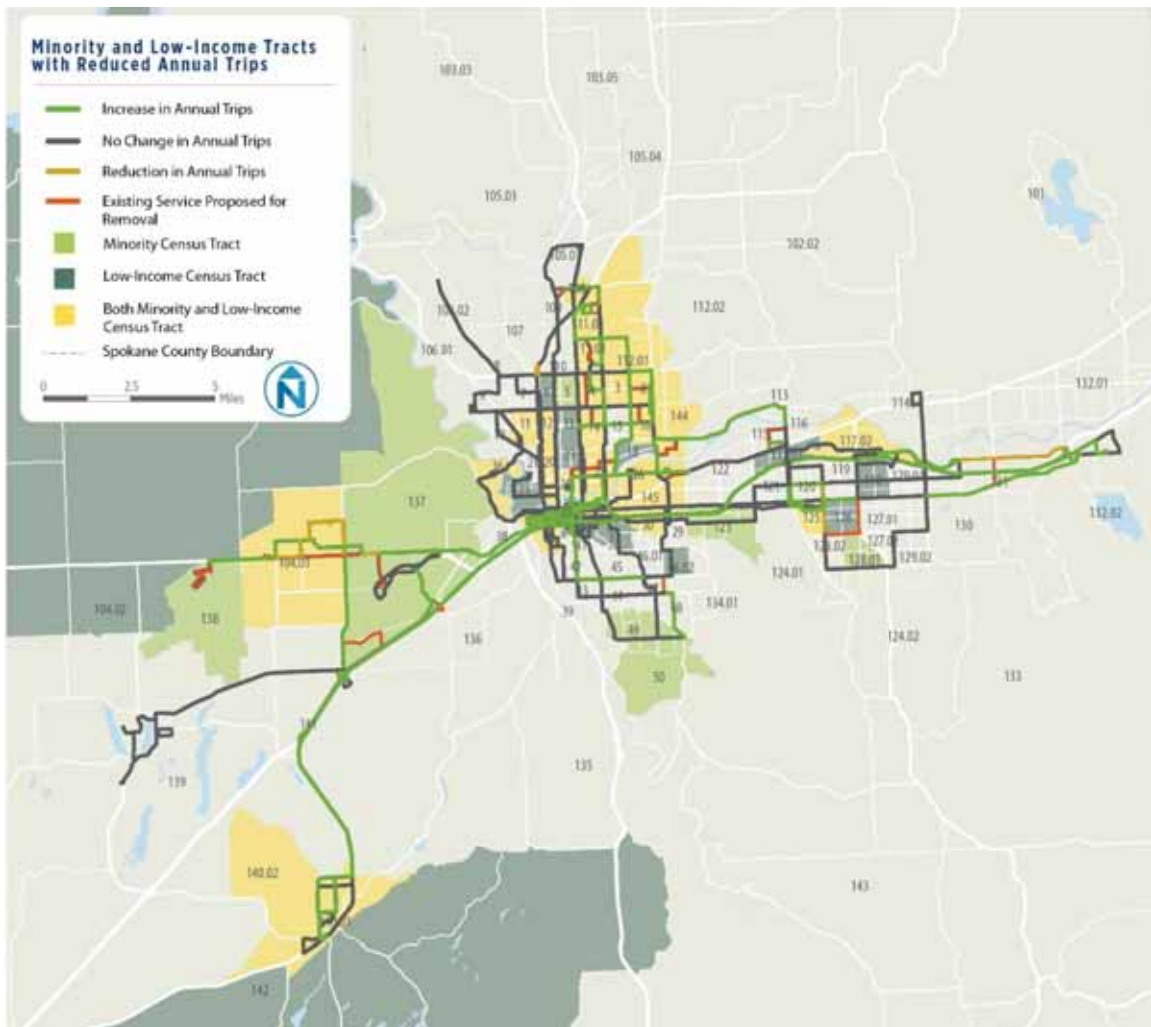
Route 29, Route 39, and Route 42 are the only such routes that both experience a reduction in service in this proposed service change and are classified as minority and/or low-income routes. The STA Title VI Program policy states that disparate impacts and disproportionate burdens would result for all three of these routes. However, this does not account for the addition of new routes that continue providing service in the area. All three of these routes are proposed to be removed from service and entirely or partially replaced by a combination of the City Line, a new Route 14, and a new Route 38.

A further analysis at the census tract level identifies the change in the annual number of trips operating within each census tract served by the three removed routes (Figure 14). This analysis shows that while these three routes are removed, all census tracts currently served by these routes would have improved transit service in the proposed service change. Thus, any potential Disparate Impact or Disproportionate Burden associated with Route 29, Route 39, and Route 42 would be mitigated and there are no Disparate Impacts or Disproportionate Burdens under the proposed service change.

Figure 13 Change in Trips at the Census Tract Level for Routes with Reduced Service

Route 29		Route 39		Route 42	
Census Tract	Change in Annual Trips	Census Tract	Change in Annual Trips	Census Tract	Change in Annual Trips
26	+88,205	16	+36,400	32	+65,375
35	+64,810	18	+77,805	35	+64,810
145	+88,195	24	+64,810	40	+64,630
		25	+76,155		
		26	+88,205		
		35	+64,810		
		144	+48,820		
		145	+88,195		

Figure 14 Change in Annual Trips from 2020 to 2022 – STA Network by Route with Census Tract Classifications



Census Tract Analysis

While not required to determine disparate impacts or disproportionate burdens according to STA's Title VI Program, a supplemental analysis was conducted to determine potential impacts at the census tract level. The results of the combined census tract classification and service analysis found that eight census tracts were identified as being low-income/minority and having reduced service under the 2022 proposed service change (shown in Figure 15), including:

- Census tract 4
- Census tract 5
- Census tract 6
- Census tract 20
- Census tract 46.02
- Census tract 104.01
- Census tract 128.01

Census Tract 4

Census tract 4 is located in north Spokane between Francis Ave, Nevada St, Wellesley Ave, and Division St. In this census tract, Route 27 is replaced with Route 35 at a lower peak frequency, reducing the number of trips operating through the census tract. However, census tract 4 is also served with multiple 15-minute frequency routes operating on Wellesley Ave, Division St, and Nevada St. This service change was made to provide higher frequency service along the Hillyard corridor on the revised Route 27 and ensures that a number of high frequency north-south and east-west routes continue serving census tract 4. While there are fewer annual trips, this tract continues to have a high level of transit accessibility.

Census Tract 5

Census tract 5 is located in north Spokane between Francis Ave, Monroe St, Wellesley Ave, and Division St. In this census tract, Route 27 is replaced with Route 35 at a lower peak frequency, reducing the number of trips operating through the census tract. However, census tract 5 is also served with multiple 15-minute frequency routes operating on Wellesley Ave, Monroe St, and Division St. This service change was made to provide higher frequency service along the Hillyard corridor on the revised Route 27 and ensures that a number of high frequency north-south and east-west routes continue serving census tract 5. While there are fewer annual trips, this tract continues to have a high level of transit accessibility.

Census Tract 6

Census tract 6 is located in north Spokane between Francis Ave, Monroe St, Wellesley Ave, and Ash St. In this census tract, Route 27 is replaced with Route 35 at a lower peak frequency, reducing the number of trips operating through the census tract. However, census tract 6 is also served with multiple 15-minute frequency routes operating on Wellesley Ave and Monroe St. This service change was made to provide higher frequency service along the Hillyard corridor on the revised Route 27 and ensures that a number of high frequency north-south and east-west routes continue serving census tract 6. While there are fewer annual trips, this tract continues to have a high level of transit accessibility.

Census Tract 20

Census tract 20 is located north of downtown Spokane and is roughly bound by Courtland Ave, Monroe St, Boone Ave, and Ash St. No service is directly removed from this census tract as a result of the 2022 service change proposal. However, the existing Route 39 operates within ½ mile of the census tract and was attributed to the annual trips serving census tract 20 in the existing network. In the 2022 proposed network, Route 39 is removed and partially replaced by the City Line at a higher frequency. However, the City Line alignment would not operate within ½ mile of census tract 20. Census tract 20 would continue to have access to transit service on Monroe St, Boone Ave, Maple St, Ash Ave, and Northwest Blvd and would continue to be within ½ mile of Route 27. No service would be removed from within census tract 20, only within ½ mile of the census tract.

Census Tract 46.02

Census tract 46.02 is located to the southeast of downtown Spokane and is roughly bound by 17th Ave, Havana St, 29th Ave, and Ray St. In the existing network, the census tract is served by both Routes 34 and 43, which connect at the South Hill Park-and-Ride located just over ½ mile east of the census tract. The proposed recommendation includes realigning Route 43 on a more direct alignment on 29th Ave west of the South Hill Park-and-Ride rather than deviating out of direction onto Ray St and 37th Ave. The segment of 29th Ave between Ray St and Southeast Blvd would now only be served by Route 34, not a combination of both Route 34 and Route 43. The reduction of service in this tract is due to removing the overlapping service on this segment. Additionally, in the proposed service change Routes 34 and 43 would interline at 39th Ave and Southeast Blvd meaning census tract 46.02 would continue to have access to both routes at the same level of service as they are currently operating. No service would be removed from within census tract 46.02, only within ½ mile of the census tract.

Census Tract 104.01

Census tract 104.01 is located in the Airway Heights neighborhood between Rambo Rd, Deno Rd, Hayford Rd, and Thorpe Rd and is served by Routes 60, 61, and 63. The proposed service changes in this census tract are intended to achieve three specific goals:

- Provide faster, more direct service
- Provide simpler, easier to understand service
- Improve local service in Airway Heights

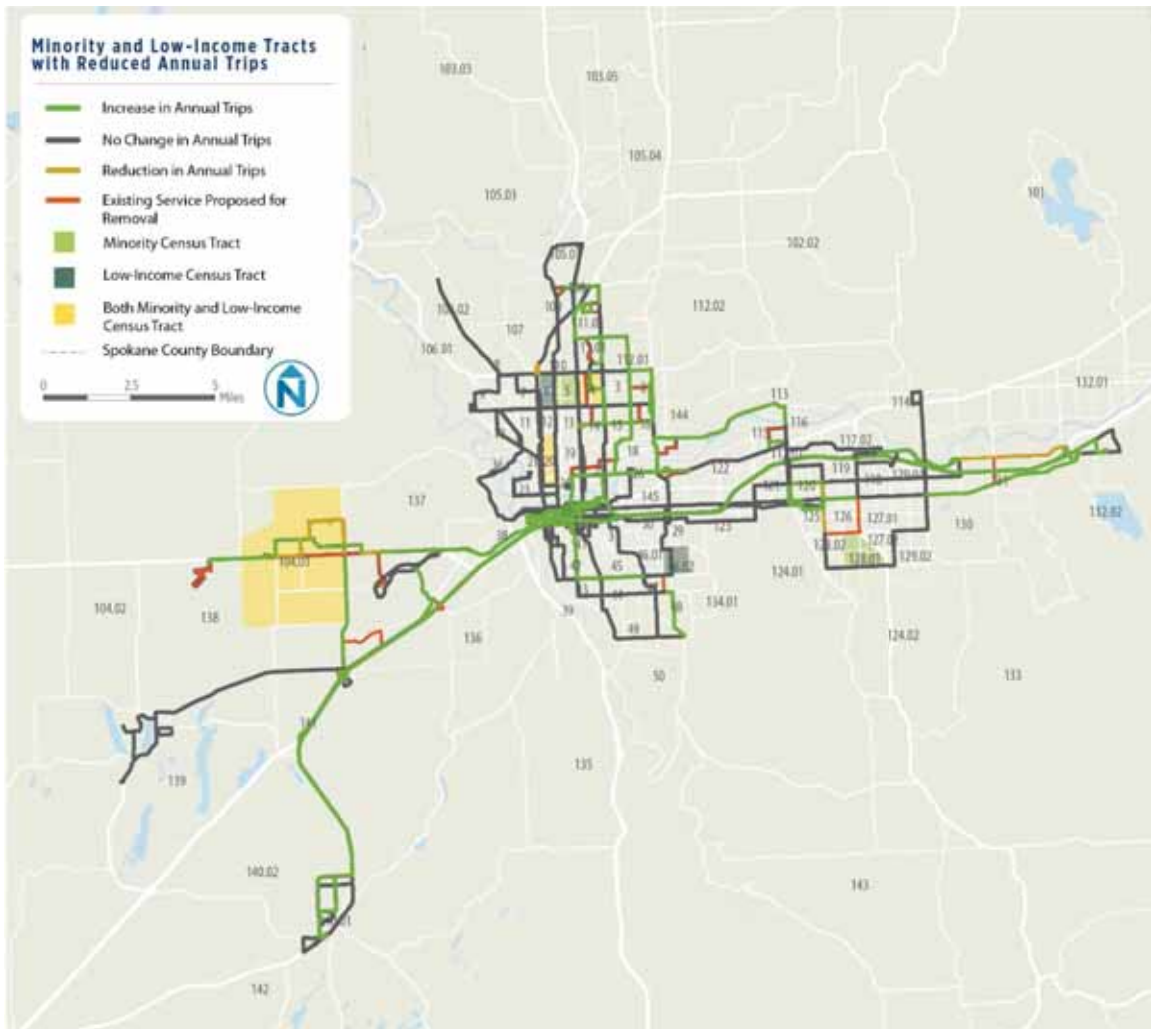
This service change achieves these goals by making Route 60 operate more consistently, removing the evening and weekend only service through Airway Heights and operating fewer deviations. Route 61 would operate more frequently, providing more useful service in Airway Heights throughout the day. Route 63 would operate a more direct alignment through Airway Heights on Hayford Rd, providing service to a larger area of this census tract than currently exists. Additionally, both Route 60 and Route 61 would provide faster, more direct service into downtown Spokane.

Census Tract 128.01

Census tract 128.01 is located in Spokane Valley, generally between 16th Ave, SR 27, 32nd Ave, and Bowdish Rd and is currently served by Routes 96 and 97. In the proposed service change, Route 96 would be realigned to provide more direct service between the Valley Transit Center, Valley

Mall, and Spokane Industrial Park. As a part of this realignment, service no longer operates south of 4th Ave on University Road, 16th Ave, or Pines Rd. This change removes Route 96 from census tract 128.01, including six stops at the intersections of 16th Ave & Pines Rd, 16th Ave & Union Rd, 16th Ave & Bowdish Rd. These six stops combined for an average of zero daily boardings and four daily alightings in 2020. This service change was made to provide faster, more direct service to higher ridership areas and removes service from low ridership areas.

Figure 15 Minority and Low-Income Census Tracts with Reduced Annual Trips



Appendix F

RESOLUTION NO. 806-22

A RESOLUTION FOR THE PURPOSE OF ADOPTING THE 2023 TITLE VI PROGRAM; AND
OTHER MATTERS PROPERLY RELATING THERETO.

SPOKANE TRANSIT AUTHORITY
Spokane County, Washington

BE IT RESOLVED BY THE SPOKANE TRANSIT AUTHORITY as follows:

WHEREAS, the Spokane Transit Authority (STA) is a municipal corporation operating and existing under and pursuant to the Constitution and Laws of the State of Washington, including RCW Title 36, Chapter 57A, Public Transportation Benefit Area; and,

WHEREAS, Section 601 of the Civil Rights Act of 1964 states: “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”; and,

WHEREAS, Title VI prohibits recipients of federal financial assistance from discriminating on the basis of race, color or national origin; and,

WHEREAS, Executive Order 12898 requires agencies to identify and address effects of its programs, policies, and activities on minorities and low-income populations; and,

WHEREAS, the Federal Transit Administration (FTA) Circular FTA C 4702.1B, requires the Spokane Transit Board of Directors to adopt a Title VI Program and to update said program every three years; and,

WHEREAS, the STA Board of Directors has developed a comprehensive transit plan, known as *Connect Spokane*, last amended on May 19, 2022, by Resolution No. 795-22, which sets forth various policies for planning and implementing public transportation services and activities; and

WHEREAS, the STA Board of Directors conducted a duly noticed public hearing on its Title VI program on February 16, 2023; and,

WHEREAS, a Washington State Environment Policy Act (SEPA) Checklist was completed for the proposed amendments and a determination of Non-Significance (DNS) was issued on February 2, 2023, and,

WHEREAS, on February 16, 2023 the STA Board of Directors held a duly noticed public hearing and heard no opposition to the proposed amendments; and,

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of STA as follows:

- Section 1. The STA Board of Directors hereby adopts the 2023 Title VI Program attached hereto as Exhibit ‘A’ and incorporated herein by reference.
- Section 2. The STA Board of Directors hereby affirms its policies in *Connect Spokane* that support the 2023 Title VI Program, including the major service change policy, disparate impact policy, disproportionate burden policy and fixed-route system-wide service standards and policies.

Section 3. The STA Board of Directors hereby authorizes the Chief Executive Officer to administer the 2023 Title VI Program.

Section 4. This resolution shall take effect and be in force immediately upon passage.


ADOPTED by STA at a regular meeting thereof held on the 16th day of March 2023.

ATTEST:

SPOKANE TRANSIT AUTHORITY

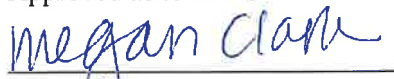


Dana Infalt
Clerk of the Authority



Lori Kinnear
STA Board Chair

Approved as to form:



Megan Clark
Attorney for Spokane Transit Authority

Spokane Transit assures nondiscrimination in accordance with Title VI of the Civil Rights Act of 1964 and the American Disabilities Act. For more information, visit www.spokanetransit.com. All phone numbers are accessible for people who are deaf or hard of hearing through Relay 711.

Upon request, alternative formats of this document will be produced for people who are disabled. Call (509) 325-6094 or email ombudsman@spokanetransit.com.