

Southeastern Regional Transit Authority

Title VI Report

February 21, 2019

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1. Introduction

Title VI of the Civil Rights Act of 1964 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.” To ensure that this provision of the Civil Rights Act is followed, each federal agency that provides financial assistance programs are directed by the United States Department of Justice to apply the provision of Title VI by issuing rules, regulations, and requirements. The Federal Transit Administration (FTA) of the United States Department of Transportation maintains a guiding document that describes the requirements of the Title VI program and establishes the rules by which the recipients of federal funds are required to follow. The guidelines were first published by the FTA on May 26, 1988 in Circular FTA C 4701.1. This circular was updated on May 13, 2007 with FTA C 4701.1A, and again on October 1, 2012 with FTA C 4701.1B, the current circular and the requirements that this report follows.

1.1. About SRTA

The Southeastern Regional Transit Authority (SRTA) was established by Massachusetts General Law 161B and has been in existence since 1974. The SRTA service area covers 289 square miles with a population of 308,614 residents and serves ten communities in southeastern Massachusetts: Acushnet, Dartmouth, Fairhaven, Freetown, Mattapoisett, New Bedford, Somerset, Swansea, and Westport with fixed route and demand response transit service. The fixed route and demand response systems are dispatched from two garages, one in Fall River and one in New Bedford: Fall River fixed route service originates from the Fall River Terminal on 4th Street; New Bedford fixed route service originates from the New Bedford Terminal on Elm Street. The two terminals are connected via the Intercity Route. SRTA provides approximately 2.6 million trips annually on the fixed route system and 60,000 trips annually on demand response system.

SRTA fixed route service is provided on 24 routes with a weekday span of service that begins at 5:20 AM and ends at 10:10 PM, Saturday span begins at 7:00 AM and ends at 8:05 PM. There is no fixed route service on Sundays; Holiday service is operated following a Saturday schedule. Demand Response service is available in all ten communities and exceeds the minimum coverage prescribed by the Americans with Disabilities Act and is available on Sundays.

The SRTA annual budget is approximately \$15 million with revenue provided through fares paid by riders, advertising on physical assets, assessments to service area communities, state contract and capital assistance grants, and federal grants for capital and operating expenses. The SRTA is governed by an advisory board of chief elected officials from each of the ten communities, a representative of the disabled community, and a rider's representative. The advisory board is responsible for appointing the administrator, approving the annual budget, establishing levels of service and fares, and approving the purchase and sale of real property.

In accordance with Massachusetts General Law 161B, operations of fixed route and demand response transit service must be contracted with an operating company; the current operating company South Coast Transit Management (SCTM) is a wholly owned subsidiary of First Transit. SCTMA is responsible for providing operators and maintenance staff, operating fixed route services and demand response service, maintaining all capital assets, and reporting system performance to SRTA. The operating contract was renewed in 2017 to SCTM, with First

Transit providing a general manager, an assistant general manager of operations, and an assistant general manager of maintenance.

1.2. SRTA Mission Statement

SRTA's mission is to provide safe, convenient, and economical transportation opportunities for people that supports economic development and improved quality of life for South Coast residents.

This report was prepared by SRTA with data collection and reporting support provided by the Southeastern Regional Planning and Economic Development District (SRPEDD). SRPEDD collected transit monitoring data and customer demographic data. SRTA is responsible for the layout and production of the report. Questions or comments about the content of this report can be addressed to:

Shayne M. Trimbell, AICP
Director of Transit Planning
SRTA
700 Pleasant Street
Suite 320
New Bedford, MA 02740

1.3. Reporting Requirements Matrix

Report Chapter	Provision	FTA C 4702.1B Reference	Reporting Requirement
Chapter 2	Notify Beneficiaries of Protection under Title VI	III.5	A notice that includes (1) a statement that the agency operates programs without regard to race, color, or national origin; (2) description of the procedures that members of the public should follow in order to request additional information on the recipient's Title VI obligations; (3) a description of the procedures that members of the public shall follow in order to file a Title VI discrimination complaint against the recipient.
Chapter 2	Develop Title VI Complaint Procedures and Complaint Form	III.6	(1) Instructions to the public regarding how to file a Title VI discrimination complaint; (2)a copy of the recipient's complaint form.

Chapter 2	Record and report transit-related Title VI investigations, complaints, and lawsuits	III.7	Prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: (1) active investigations conducted by entities other than FTA; (2) lawsuits; (3) complaints naming the recipient. This list shall include: (1) the date that the investigation, lawsuit, or complaint was filed; (2) a summary of the allegation(s); (3) the status of the investigation, lawsuit, or complaint; (4) actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint.
Chapter 3	Promoting Inclusive Public Participation	III.8	(1) A copy of the public participation plan that includes an outreach plan to engage minority and limited English proficient populations; (2) a summary of efforts made since the last Title VI submission.

Chapter 4	Provide meaningful access to LEP Persons	III.9	A copy of the recipient's Language Access Plan which shall, at a minimum (1) include the results of the Four Factor Analysis; (2) describe how the recipient provides language assistance service by language; (3) describe how the recipient provides notice to LEP persons about the availability of language assistance; (4) describe how the recipient monitors, evaluates, and updates the language access plan; (5) describe how the recipient trains employees to provide timely and reasonable language assistance to LEP populations.
N/A	Minority representation on planning and advisory boards	III.10	(1) A table depicting the racial breakdown of membership of those committees; (2) a description of efforts made to encourage the participation of minorities on such committees.
N/A	Provide assistance to subrecipients	III.11	Provide (1) sample Notice to Beneficiaries of Protection under Title VI; (2) sample procedures for tracking and investigating Title VI complaints; (3) demographic information on the race and English proficiency of residents served by subrecipient.

N/A	Monitoring Subrecipients	III.12	(1) Document process for ensuring that all subrecipients are complying with general reporting requirements; (2) collect Title VI programs from subrecipients and review for compliance; (3) request that subrecipients who provide transportation services verify that their level and quality of service is provided on an equitable basis.
N/A	Determination of site or location of facilities	III.13	Copy of Title VI analysis of the located constructed facilities.
Chapter 7	Set System-wide service standards	IV.4.a	Develop quantitative standards for: (1) vehicle load; (2) vehicle headway; (3) on-time performance; and (4) service availability.
Chapter 7	Set System-wide service policies	IV.4.b	Develop a policy for the following service indicators: (1) distribution of transit amenities; (2) vehicle assignments for each mode.

Chapter 5	Collect and Report Demographic Data	IV.5.a	Prepare (1) a base map of the transit provider's service area that overlays Census tract with transit facilities - including transit routes, transit stops, depots, maintenance and garage facilities, administrative buildings, as well as major activity centers and transit trip generators, and major streets and highways; (2) demographic map that plots information listed above in (1) and also shades those Census tracts where the percentage of minority population residing in these areas exceeds the average percentage of minority populations for the service area as a whole; (3) maps that depict those Census tracts where the percentage of total low-income population residing in these areas exceeds the service area population as a whole.
Chapter 5	Collect and Report Ridership and Travel Patterns	IV.5.b	Passenger demographic collected through surveys that (1) compare minority and non-minority riders, trips taken by minority riders and non-minority riders; and (2) a summary in tabular form of information collected on the race, color, national origin, English proficiency, language

			spoken at home, household income, travel patterns, usage by fare type.
Chapter 6	Monitor Transit Service	IV.6	(1) An assessment of the performance of transit performance of each minority and non-minority routes for each of the transit provider's service standards and service policies; (2) comparison of the transit service observed in the assessment to the transit provider's established service policies and standards (3) an application of a policy or procedure to determine whether disparate impacts exist on the basis of race, color, or national origin; (3) documentation that the results have been submitted to the administrator for consideration, awareness, and approval of the monitoring results.

Chapter 8	Evaluate Service Changes	IV.7.a	(1) Documentation of major service change policy; (2) definition and analysis of adverse effects related to major service changes; (3) documentation of a policy for measuring disparate impacts and disproportionate burdens that establish thresholds for determining when adverse effects of service change are borne disproportionately by minority and/or low-income populations presented as a statistical percentage and applied uniformly; (4) documentation that the service provider engaged the public in the decision making process to develop the major service change policy, the disparate impact policy, and the disproportionate burden policy; (5) a description of the dataset and technologies used in the analysis; (6) an evaluation of the impacts of proposed service changes.
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Chapter 8	Evaluate Fare Changes	IV.7.b	(1) description of the datasets, technologies, and techniques used to collect data and determine the number and percent of users for each fare media being changed and an analysis of minority and low-income riders use of fare media; (2) an assessment of the impacts the proposed fare change will have on minority and low-income populations; (3) documentation of minority disparate impact and low-income disproportionate burden policies which establish thresholds and analysis whether minority and/or low-income riders are bearing a disproportionate impact of the changes between the existing cost and the proposed cost presented as a statistical percentage and applied uniformly across all fare media; (4) documentation that the transit provider engaged the public in the decision making process to develop the disparate impact/disproportionate burden policies.
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2. General Reporting Requirements

2.1. Notice to the Beneficiaries of Protection

Title VI Notice to the Public

Southeastern Regional Transit Authority (SRTA) gives public notice that it complies with the Title VI of the Civil Rights Act of 1964 and all related statutes.

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." SRTA operates its programs and services without regard to race, color, and national origin in accordance with Title VI.

For more information on SRTA's Title VI Program, obligations, procedures and/or to file a complaint, please call (508) 997-6767 and ask for the Title VI Coordinator.

The complaint form can be mailed to:

Shayne M. Trimbell, AICP
Title VI Coordinator
Southeastern Regional Transit Authority
700 Pleasant Street, Suite 320
New Bedford MA 02740

OR you may visit our administrative office at:

700 Pleasant Street, Suite 320
New Bedford MA 02740

Complaint procedures and forms are also available on SRTA's website at www.srtabus.com.

A complaint may also be filed directly with the Federal Transit Administration at:

Federal Transit Administration Office of Civil Rights
Region 1
Attention: Title VI Program Coordinator
55 Broadway – 9th Floor
Cambridge, MA 02142

If information is needed in another language, please call (508) 997-6767.

Si necesita esta informacion en otro idioma por favor de llamar al (508) 997-6767.

Se a informação for necessária em outra língua, por favor chame (508) 997-6767.

Figure 1: Title VI Notice to the Public

2.2. Title VI Notice Posting Locations

The Title VI Notice to the Public is posted in the following locations:

- SRTA Administrative Office
- Driver's lobby
- Maintenance Office
- Website – www.srtabus.com
- All fixed route vehicles
- All demand response vehicles
- New Bedford Terminal lobby
- Fall River Terminal lobby

The Title VI complaint procedure and complaint form are available at the following locations:

- SRTA Administrative Office
- Website – www.srtabus.com

2.3. Complaint Procedures

TITLE VI COMPLAINT INSTRUCTIONS AND PROCEDURE

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by SRTA may file a Title VI complaint by completing and submitting SRTA's Title VI Complaint Form. Complaint forms must be filed no later than 180 calendar days following the date of the incident in question.

How to file a complaint: A complaint can be filed in writing and mailed to the following address:

Shayne M. Trimbell, AICP
Title VI Coordinator
Southeastern Regional Transit Authority
700 Pleasant Street, Suite 320
New Bedford, MA 02740

The preferred method is to file a complaint in writing by completing SRTA's Title VI Complaint Form.

If you do not use SRTA's Title VI Complaint Form, your written complaint must be signed and at a minimum contain the following:

- Contact information including name, mailing address, telephone number(s) and e-mail address, etc.;
- A description of how, when, where and why you believe you were discriminated against including location, names and contact information of any witnesses; and
- Other information that you deem significant or important.

If information is needed in another language, please call (508-997-6767).

Si necesita esta informacion en otro idioma por favor de llamar al (508) 997-6767.

Se a informação for necessária em outra língua, por favor chame (508-997-6767).

Figure 2: Title VI Complaint Instructions

A complaint can be filed verbally by calling the Title VI Coordinator at (508) 997-6767 x 3312.

You also have the right to file a complaint with an external entity such as the Department of Transportation (DOT), a federal or state agency, or a federal or state court.

Title VI Procedure:

- I. When a complaint is received by SRTA, the Title VI Coordinator will acknowledge within ten (10) days by a phone call or mail, depending on the contact information. If a complaint is incomplete, additional information will be requested, and the Complainant will be provided thirty (30) business days to submit the required information. If the information is not received within 30 business days, the case can be administratively closed by SRTA. A case can also be administratively closed if the complainant no longer wishes to pursue their case.
- II. Should a complaint be filed with SRTA and an external entity simultaneously, the external complaint shall supersede SRTA's complaint and SRTA's complaint procedures will be suspended pending the external entity's findings.
- III. Within fifteen (15) business days from receipt of a complete complaint, a determination will be made if the complaint has sufficient merit to warrant investigation as a Title VI complaint. The Complainant will be notified of the decision, within five (5) days of the date the decision is made. If the decision is not to investigate as a Title VI complaint, the notification shall specifically state the reason for the decision.
- IV. Investigation:
 - a. The investigation will address complaints against SRTA and be conducted in conjunction with and under the advice of the Title VI Coordinator.
 - b. The investigation may include discussion(s) of the complaint with all affected parties to determine the problem. The Complainant may be represented by an attorney or other representative of his/her own choosing and may bring witnesses and present testimony and evidence in the course of the investigation.
 - c. The investigation will be conducted and completed within sixty (60) days of the acceptance of the formal complaint.
 - d. Based upon all the information received, an investigation report will be written by the Title VI Coordinator for submittal to the Administrator.
- V. The Complainant will receive a letter stating the final decision of the Administrator by the end of the 60-day limit.
- VI. The Complainant shall be notified of his/her right to appeal the decision.

2.5. Complaints and Investigations

SRTA maintains a tracking list and summary of transit-related Title VI investigations, lawsuits, or complaints. It is the responsibility of the SRTA Title VI Coordinator to maintain this list. SRTA has a database for tracking complaints using the following fields: Case Number; Case Type (Investigation, Lawsuit, Complaint); Name; Address; Basis of Complaint (Race, Color, and/or National Origin); Summary of Complaint; Date Submitted; Date of Alleged Incident; Complaint Complete; Acknowledgement Due Date; Acknowledgement Sent Date; Decision to Investigate; Complainant Notification Due Date; Complainant Notification Date; Investigation Completion Due Date; Investigation Completion Date; Action Taken; Complaint Status.

SRTA acknowledged and investigated five Title VI complaints between April 1, 2016 and March 31, 2019: none of the complaints were determined to be valid Title VI complaints. The full list of complaints is in Appendix A.

2.6. Minority Representation on Appointed Committees

SRTA does not have any non-elected planning boards, advisory councils, or committees for which the membership is selected by SRTA. The SRTA Advisory Board members are appointed by the member communities to serve as a representative for the community.

2.7. Subrecipient Monitoring

The following Title VI requirement is not applicable to SRTA: "Primary recipients shall include a description of how the agency monitors its sub-recipients for compliance with Title VI, and a schedule of sub-recipient Title VI Program submissions."

2.8. Equity Analysis for Constructed Facilities

SRTA has not constructed any facilities since the previous Title VI Report was submitted on April 1, 2016.

3. Public Participation

3.1. Public Participation Plan

Public participation is integral to the planning process for SRTA service. The public is the customer and it is imperative to operate service that addresses the transportation needs of the public. Public participation is an on-going endeavor that precedes all decisions regarding service changes and fare changes. Including the public in the decision-making process is not only the right thing to do, it is required by statute under 49 U.S.C. Sections 5307(b) and 5307(c)(1)(I). Presented here is the SRTA Public Participation Plan and a summary of public engagement activities since March 16, 2016 when the previous Title VI Report was adopted.

Public participation is most effective when it is inclusive of all members of the communities in regardless of race, color, national origin, or their ability to speak and understand English. Moreover, it is important that community members have confidence that they will be heard, that their input will be valued, and that the input will be considered properly when decisions are made. There may be times when the outcome of a decision is unpopular, just as there are times when a decision may be lauded by the community, however regardless of public opinion of the outcome, the public should always have ample opportunity to participate in the decision-making process.

When to Engage the Public?

In accordance with 49 U.S.C. Sections 5307(b) and 5307(c)(1)(I), public participation is required prior to raising fares or implementing a major service change. SRTA defines a major service change as one that increases or reduces route mileage or route revenue mileage by more than 25% of the existing condition. Public participation is also required prior to constructing transit facilities.

In addition to the statutory requirement for public participation, SRTA has expanded opportunities for participation by providing time at each Advisory Board meeting for the public to address the board. SRTA also hosts periodic public round table discussions for demand response passengers to raise awareness of issues related to the service. Annually, SRTA hosts open forums to gather input on customer satisfaction, ideas for service improvements, and to inform the public of programs or services available for customers. On a less frequent basis and as needed, SRTA will conduct customer surveys on buses and in terminals to gather information on topics relevant to a planning initiative.

3.2. Public Participation Methods

Effective public participation requires more than a single approach or method. Often, the method appropriate for one initiative may not be appropriate for another. At times, a single method approach may be appropriate, where as other times it is necessary to employ multiple techniques to ensure equitable participation. Described here are the methods SRTA will use to engage the public in the decision-making process.

Open Forum

The open forum is the most open, least structured form of public engagement employed by SRTA. The open forum is held periodically and without a specific topic, issue, or purpose to be addressed but rather as a way for the public to speak directly with SRTA planning and administrative staff and provide ideas for improvement, share experiences with the service, and

communicate directly to SRTA. The forums are held in the Fall River and New Bedford terminals with staff on hand to speak directly with customers. Open forums are scheduled during times of the day when passenger volumes are greatest in the terminals, and held on multiple days to provide ample opportunities for engagement.

The open forum concept was first utilized in June 2017 and was received well by customers. The forum was again repeated in October 2018 with another warm reception by customers and will become an annual or semi-annual activity.

Public Meeting

A public meeting is more formal than the Open Forum in that a public meeting is held when a specific issue is being addressed. Public meetings are the first point of contact with the public to present proposed service changes or fare changes. Public meetings will include large format visualizations of proposals, ample staff available to speak with members of the public, a formal presentation at pre-scheduled times, surveys, and other methods to record public input.

Public meetings are held in locations as close to the affected areas as possible so that members of the affected community will not need to travel far to participate. Meetings are held in locations with open access to the public and comply with the Americans with Disabilities Act. Meetings are scheduled for times of the day and days of the week when the affected route is in service.

Visualizations are a substantial element of public meetings. The visualizations are typically large format posters that provide descriptions, maps, design concepts, etc. that contextualize the purpose of the meeting. Visualizations can be used as a tool to describe the issue being discussed, but can also be utilized to garner input by providing an opportunity to interact with the display. Interactive visualizations ask meeting participants to mark-up areas of importance, provide prioritization of concepts, provide feedback on areas of concern.

Notice of public meetings are made no less than two weeks prior to the scheduled date. Notices are posted in the SRTA terminal that serves the affected area and on all buses that serve the affected area (i.e. meetings held in Fall River are posted at the Fall River Terminal and buses; meetings held in New Bedford are posted at the New Bedford terminal and buses). Meeting notices are posted online through the SRTA Facebook page, Twitter account, and on the SRTA website. Notices are sent to local agencies that may serve affected populations to distribute through their networks.

Public meetings are staffed with Portuguese and Spanish language interpreters and language assistance is included on the posted meeting notice. Meeting notices are prepared in English, Portuguese, and Spanish, the three most prevalent languages spoken in the SRTA service area.

Public meetings being more formal than open forums, participants are asked to provide basic personal information upon entry to the meeting. Providing information is optional and the information collected is limited to name, address, phone number, and email address. The record of attendees is kept on file along with a summary of the meeting and the issues discussed.

Public Hearing

Public hearings are the most formal method of public involvement and are held to receive public comment on a specific service change or fare change. The testimony provided during the hearing is recorded and transcribed verbatim and kept on file as part of the project record. The hearing testimony is reviewed and an assessment of whether the public comment supports or refutes the proposal is provided with the hearing record.

Public hearings, similar to public meetings, are held in locations that are accessible by the SRTA fixed route system, in buildings that provide access for persons with disabilities, and are scheduled for dates and times that allow the public to use the SRTA system as a means of transportation to and from the hearing. Hearings are staffed with Portuguese and Spanish language interpreters and language assistance is included on the posted meeting notice. Hearing notices are prepared in English, Portuguese, and Spanish, the three most prevalent languages spoken in the SRTA service area.

Notice of public hearings are made no less than two weeks prior to the scheduled date. Notices are posted in the SRTA terminal that serves the affected area and on all buses that serve the affected area (i.e. hearings held in Fall River are posted at the Fall River Terminal and buses; hearings held in New Bedford are posted at the New Bedford terminal and buses). Hearing notices are posted online through the SRTA Facebook page, Twitter account, and on the SRTA website. Notices are sent to local agencies that may serve affected populations to distribute through their networks.

Public hearings, being the most formal form of public engagement, participants are asked to provide a name and city of residence prior to beginning their testimony. This information is included in the hearing record so that the comments can be properly attributed to the person providing the comment.

Public hearings are used to initiate the public comment period for service change and fare change proposals. Public comment periods extend no less than thirty days from the date of the public hearing; written comments are accepted by SRTA via mail, email, or delivered in person and are given equal consideration to verbal testimony provided during the hearing and recorded with the hearing report. The decision to implement a proposed service change or fare change occurs after the public comment period has been closed, comments have been recorded to the project file, and an assessment of public comments has completed. Public comments are considered as part of the decision to implement a service change or fare change; however, circumstances may require that the change is implemented despite public opposition.

Public comments are an important element of the decision-making process, and in most cases, a decision is supported by public comments. There are rare cases where a decision may not be supported by the public comments, however circumstances dictate that a change is necessary. These instances are rare, and are generally driven by resources available to SRTA to operate the service. Changes that are not supported by public comments are implemented so long as measures are in place to mitigate any disparate impact on minority populations or disproportionate burden on low-income populations.

Advisory Board Meetings

The SRTA is governed by a twelve-member advisory board: one representative from each of the ten communities in the service area, one member representing the disability community, and one member representing riders. The advisory board meets periodically throughout the year with an annual minimum requirement to hold six meetings. Meetings are held in either the Fall River City Hall or the New Bedford City Hall and alternate between each location. Advisory board meetings are public meetings and are subject to all public meeting laws.

Meeting agendas include time for the public to present testimony directly to the advisory board. The time is reserved for the public to bring any issue to the attention of the advisory board and is not used by the advisory board or SRTA staff to receive testimony on a specific issue. Comments received during advisory boards are recorded for the minutes of the meeting and when relevant to an on-going project, the meeting minutes are retained with the project file.

Customer Survey

Customer surveys are a method to collect and record passenger data in a uniform manner that allows for analysis and reporting of the results. Surveys are used for specific issues or proposals such as a route change or fare change, developing a customer demographic profile, identifying changes in customer opinions and riding trends, understanding demand for service in unserved areas, etc. Surveys are conducted in terminals, on buses, at the sites of proposed service expansion, or any location that is relevant to the purpose of the survey. Surveys are generally administered in person with a physical copy of the survey provided to survey taker. When appropriate, a digital survey is made available and administered either in-person with a tablet computer or remotely with an internet survey. SRTA prepares surveys in English, Portuguese, and Spanish.

Demand Response Consumer Advisory Meetings

SRTA hosts quarterly consumer advisory meetings in which Demand Response customers are encouraged to participate and provide feedback on their experience with the service. The meetings bring together customers, operations managers, and customer service staff for the purpose of discussing the service and identifying areas for improvement. The meetings are open to the public and are advertised on Demand Response vehicles; an email meeting notice is distributed to the Demand Response customers that have registered their email address with SRTA. Demand Response customers that wish to attend are provided a fare free ride to and from the meeting.

The meeting format for the Consumer Advisory Meetings is that of a round-table discussion. The meeting is an opportunity for Demand Response passengers to speak candidly about their experience using the service, bring forward complaints and commendations, and discuss ideas to improve the service. A meeting summary is prepared, distributed to those that attended via email, and kept on file.

Ad Hoc Meetings with Social Service Agencies and Business Groups

During the course of service planning, SRTA staff may meet with social service agencies and business groups to understand changes in the region that may affect demand for service. Involvement with the various groups differs and is typically issue specific, as such, the meetings and involvement do not generally occur on a regular basis. The information exchange is

important since these groups are able to articulate the needs to the people they represent provide SRTA a conduit to share information and garner input relevant to the work being conducted.

Social Media and Online Engagement

Social media has become ubiquitous in daily life. SRTA recognizes the ubiquity of social media and has developed a presence on the most popular platforms. SRTA is most active on Facebook and Twitter but also maintains a presence on Instagram as well. These services allow for the dissemination of information in a way that is direct to customers without being intrusive or burdensome on their lives. The use of social media has increased in the past three years and has become the primary distribution source of much of the information the public needs to stay informed on the activities of SRTA.

Social media platforms offer many tools that streamline the information dissemination process and also provide tools to customers that offer language translation into the language of their choosing. These tools provide an opportunity to disseminate information without the burden of translating the information into different languages. The platforms provide tools to monitor use by language, which gives SRTA more information about its customers in ways that have only recently become available.

The platforms also provide an opportunity for customers to provide feedback by posting comments on posts or through a direct message that is received by SRTA staff. Post comments are reviewed by SRTA staff, however are not visible to the public. Post comments are kept private because commenters occasionally use vulgar and obscene language and SRTA does not have the staff resources to review each comment before it is posted publicly to ensure appropriate language is used.

3.3. Public Participation Procedures

The procedures for engaging the public ensure the engagement is meaningful for the community by providing the appropriate method of engagement and that community members are able to participate in a meaningful and substantial manner. The procedures shown here are a guideline since every project or initiative can vary and require a varied approach to public participation. The procedures establish a minimum effort and can be expanded as needed.

Step 1 – Determine if public participation is required or appropriate

The first step in engaging the public is to determine whether the topic or issue requires public participation. SRTA has established a standard to engage the public for all fare changes and for any service change that affects more than 25% of a route's total mileage or revenue mileage. This standard is established to ensure that the public is engaged for service or fare changes that will affect a substantial portion of the service they use. The standard affords SRTA the ability to make minor changes such as adding or eliminating a specific stop on a route, changing the route alignment to a parallel street, adding or eliminating a single trip on a route; minor changes do not reach the 25% threshold and have minimal impact on service.

Step 2 – Identify the affected population

If the results of Step 1 indicate that public participation is appropriate, the next step is to identify the population to be affected by the proposed change. For fare changes, the affected population is all riders and residents of the SRTA service area, however smaller service

changes are likely to affect only a subset of the SRTA service area population. SRTA keeps demographic information in a GIS system that is organized by route. As part of developing the proposed service change, SRTA will analyze demographic information to identify the affected population, determine the minority and low-income status of the affected population, and determine the languages likely spoken by the affected population.

Step 3 – Determine the appropriate method of engagement

The method of engagement is largely determined by the scope of the project and the intended outcome. The choice of method is also determined by the extent of the affected population and the demographic composition of the population. Public participation is demanding on staff resources, so it is important that the appropriate methods are chosen and are properly matched to the scope of the project. The following guidelines are intended to help choose the appropriate method of engagement:

- Fact Finding – learning about an issue or topic before developing service plans
 - Customer surveys – online and in-person
 - Ad-hoc meetings with groups representing the affected population
 - Open forum
 - Public meeting
- Service/Fare Change initial and revised proposals
 - Customer survey on affected routes and at affected stops
 - Ad-hoc meetings
 - Public meeting held in the affected area
 - Demand Response Consumer Advisory meeting
- Service/Fare Change Decision Point
 - Public Hearing

Public participation needs vary by project and should be matched with the scope and scale of the project. Service changes that only affect a small area or population will require less engagement than projects or larger scope that affect several routes or larger segments of the SRTA service area population. The demographics of the affected population may also dictate different methods of engagement to accommodate the needs of the public. If the public to be engaged is determined to be LEP, the methods should include translation of documents and visualizations presented during the meeting as well as having interpreters present during the meeting to ensure language is not a barrier to participation.

Step 4 – Choose an appropriate time and location for public participation events

The time and location for meetings are important to ensure the public has the opportunity to participate. Meetings are held in locations as close to the affected area as possible to reduce the travel needs for the affected population and must be located on an SRTA bus route in service during the meeting hours. The locations must be accessible for persons with disabilities, provide enough space for anticipated number of attendees, be well lit so that visualizations can be seen clearly, and have reasonable acoustics so that attendees can clearly hear any presentation or dialogue. SRTA will accommodate the hearing impaired by providing assistive listening devices during the meeting if requested. Requests for assistive listening devices need to be acknowledged by SRTA seven days in advance of the event to provide adequate time to arrange for the equipment to be present during the meeting.

Meeting days and times are scheduled to accommodate the needs of the community and are typically scheduled during the late afternoon or early evening hours of weekdays. The times are chosen to accommodate the workforce during non-working hours. On occasion, public outreach will be conducted on weekends and is most commonly used for conducting passenger surveys. Open forums are typically scheduled for the busiest times in the SRTA terminals to include as many customers as possible.

Step 5 – Advertise the public participation event

Once the public engagement methods have been chosen, the locations identified, and the times have been scheduled, the public must be made aware of the opportunity to participate. SRTA posts notices of public participation no less than two weeks in advance of the event date. The posting includes the date, time, and location of the meeting with directions to the location. The posting includes information about the event purpose, what is being proposed, and that the public is encouraged to participate. All postings include information in English, Spanish, and Portuguese. The information is posted on all SRTA fixed route buses (and Demand Response vehicles if the customers are likely to be affected) and in the SRTA terminals. Additionally, SRTA uses social media sites like Facebook, Twitter, and Instagram to promote the event. In the case of customer surveys, the notices will explain when and where survey takers will conduct the survey and generally include a link to an online version of the survey.

Step 6 – Hold the event

The event is held at the location and the time advertised. Participants are asked to provide basic personal information upon entry (name, place of residence, phone number, and email address). The space is arranged according to the purpose:

- Open Forums – Tables are set up out of the way of terminal customers but in the direct line of sight of those in the terminal. Visualizations are large format and generally interactive. Staff is available to speak with customers. No sign-in is requested.
- Public Meetings – visualizations are set up in stations to allow for one-on-one conversation between SRTA staff and participants. Seating is available in the meeting space, and is oriented towards the podium and presentation screen if a presentation is planned. Upon entry, attendees are asked to provide basic personal information and are provided any print materials relevant to the topic of discussion; print materials is prepared in English, Spanish, and Portuguese.
- Public Hearing – the room is set-up with seating facing the front of the room. A table and chairs are placed at the front of the room for SRTA to sit behind while receiving testimony. A space is provided for attendees to stand and address SRTA. The attendees that provide testimony are asked to give their name and place of residence. Any visualizations or printed material is provided upon entering. The hearing is opened by SRTA with a description of the change for which comment is sought.

Step 7 – Summary Report

At the conclusion of the public input event and after the written comment period closes (no fewer than thirty days after the event is held), a summary report is prepared to document the public participation. The summary report describes the event that was held, the process followed (Steps 1 through 6), and comments received. The report is placed on file with the project and is included as an appendix to the final project report. If a decision is made to

implement the proposed change, the summary report is used as a reference document in the decision. All public participation efforts are reported to the Advisory Board and recorded to board meeting minutes.

3.4. Public Outreach Activities

The Public Participation Plan specifies how SRTA conducts public outreach and public engagement. Below is a description of how SRTA has employed the methods of public engagement since the last plan was adopted on March 16, 2016. The practices are listed chronologically by method

- **Open Forum**
 - June 6, 2017 – New Bedford Terminal
 - June 5, 2017 – Fall River Terminal
 - October 30, 2018 – New Bedford & Fall River Terminals
 - October 31, 2018 – New Bedford & Fall River Terminals
- **Public Meeting**
 - May 3, 2018 – New Bedford Route 1 Service Change
- **Public Hearing**
 - June 8, 2016 – Intercity Service Frequency Increase
 - May 29, 2018 – Fall River Route 14 Service Change
- **Advisory Board Meetings**
 - April 28, 2016
 - May 26, 2016
 - June 23, 2016
 - September 29, 2016
 - October 20, 2016
 - January 19, 2017
 - March 30, 2017
 - April 20, 2017
 - May 25, 2017
 - June 22, 2017
 - November 16, 2017
 - January 18, 2018
 - March 29, 2018
 - April 19, 2018
 - May 31, 2018
 - August 16, 2018
 - October 18, 2018
 - November 15, 2018
- **Customer Survey**
 - May 2016 – Father DeValles Boulevard Business Survey
 - August 2016 – Stop and Shop Freetown Distribution Center Employee Survey
 - June 2018 – SRTA Customer Satisfaction and Demographic Survey
- **Demand Response Consumer Advisory Meetings**
 - June 16, 2016
 - September 22, 2016
 - December 20, 2016

- March 21, 2017
- June 20, 2017
- September 12, 2017
- December 12, 2017
- April 3, 2018
- December 11, 2018
- **Ad Hoc Meetings with Social Service Agencies and Business Groups**
(Listed by group as meeting dates are numerous)
 - Coastline Elder Services Age Friendly Community Committee
 - Community Economic Development Center of New Bedford
 - Fall River Chamber of Commerce Government Affairs Committee
 - Fall River Industrial Park Business Association
 - New Bedford Chamber of Commerce Government Affairs Committee
 - New Bedford Housing Authority
 - Southeast Regional Coordinating Council on Transportation
 - United Way of Greater New Bedford
- **Social Media and Online Engagement**
 - 2016 – 4 posts with total of 0 views
 - 2017 – 66 posts with total of 23,990 views
 - 2018 – 137 posts with total of 90,535 views

4. Language Assistance Plan

The Language Access Plan is prepared with two elements: Four Factor Analysis, and the Implementation Plan. The Four Factor Analysis informs the implementation plan by establishing the languages and the extent to which assistance should be provided. The Implementation Plan establishes the framework by which SRTA will ensure that language assistance is available to limited-English proficient customers and members of the public.

4.1. Four Factor Analysis

The requirement to provide meaningful access to limited-English proficient (LEP) persons was established by Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” (65 FR 50121, Aug. 11, 2000). Executive Order 13166 requires that recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English proficient. To identify the steps needed to ensure compliance, the U.S. Department of Transportation has established the “Four Factor Analysis” which determines the specific language services that are appropriate for the recipient to provide.

The Four Factor Analysis asks four questions:

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

The results of the Four Factor Analysis are used to develop the Language Access Plan and set policies for ensuring access for LEP persons served by SRTA.

Factor 1 – The number and proportion of LEP persons served

To document the presence of LEP populations in the service area, SRTA uses data provided by the American Community Survey that indicates the language spoken at home and the proficiency in English. The data used in this report is derived from the American Community Survey (ACS) Five Year Estimate 2010 – 2014, Table B16001 and analyzed based on Census Tract. In addition to American Community Survey data, SRTA uses customer survey responses to document the languages spoken and the proficiency in English; the most recent survey was conducted in 2018 and is used in this report.

Based on the ACS data, SRTA has identified 29 distinct languages spoken by residents within the service area. The populations speaking non-English languages range from 21,025 to 10 for each language. To assist recipients in determining which languages should be considered for translation or interpretation, the Department of Transportation has adopted the Department of Justice definition of the Safe Harbor Provision. The Safe Harbor Provision requires that written translation of vital documents is necessary for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population.

Language	Language Total	% of Total by Language
English Only	213,544	86.60%
Portuguese or Portuguese Creole	21,025	8.53%
Spanish or Spanish Creole	7,900	3.20%
French Creole	1,070	0.43%
Mon-Khmer, Cambodian	563	0.23%
Chinese	485	0.20%
French (incl. Patois, Cajun)	468	0.19%
Arabic	276	0.11%
Vietnamese	268	0.11%
Polish	144	0.06%
Greek	125	0.05%
Korean	95	0.04%
Urdu	85	0.03%
Russian	83	0.03%
Other Indo-European languages	81	0.03%
Other Asian languages	72	0.03%
Tagalog	57	0.02%
Other and unspecified languages	33	0.01%
Italian	31	0.01%
Japanese	30	0.01%
African languages	29	0.01%
Hindi	22	0.01%
Other Slavic languages	20	0.01%
Persian	20	0.01%
Other Indic languages	19	0.01%
Gujarati	14	0.01%
Other Native North American langu	11	0.00%
German	10	0.00%
Laotian	10	0.00%
Total	246,590	100.00%

Table 1: SRTA Service Area Languages

Based on the Safe Harbor Provision requirements, three languages exceed the threshold of five percent of the total population or 1,000 persons: Portuguese, Spanish, and French Creole. French Creole is a new language for SRTA; in the 2016 Language Access Plan, the French Creole speaking population that did not speak English well was 476. The ACS reported an estimated population of French-Creole speakers of 1070 with a margin of error of 8.12%; the margin of error places the population range with an estimated low of 927 to an estimated high of 1213. The increase from 476 to 1,070 is a substantial shift in population and one that potentially includes French Creole as a Safe Harbor language; Portuguese and Spanish remain Safe Harbor Languages when considered against the low range estimate based on the reported margin of error for the data.

The presence of Portuguese and Spanish speaking populations is well understood by SRTA since the communities in which service is provided have a long history of Portuguese and

Spanish speaking immigration and residency. French Creole however, as a new Safe Harbor language is not as well understood and the population speaking it have increased rapidly and substantially. The language is spoken predominantly by the Haitian community, which is relatively small in the SRTA service area. Identifying where the population resides, the extent to which they are literate in their native language, and the frequency by which the community members access SRTA services has been difficult to document. The ACS data indicated that the French Creole population was predominantly located in New Bedford.

As a measure to address the knowledge gap, SRTA contacted and met with several community service agencies that may encounter the Haitian community through their work. A meeting was held with Coastal Foodshed, an organization that manages farmer's markets in New Bedford and serves the low-income and minority populations in the city. They indicated that their staff predominantly interacts with Spanish speaking customers, so much so that they employ bi-lingual staff at markets to assist Spanish speakers. Anecdotally, they were unaware of French-Creole speakers utilizing the farmer's markets. A meeting was held with the Community Economic Development Center (CEDC) of New Bedford, an economic development non-profit that assists minority groups to develop businesses, connects workers with employment opportunities, and advocates for the rights of minority populations. The CEDC had no knowledge or experience interacting with French-Creole speakers and indicated that the majority of their interactions occur with Spanish speaking populations. SRTA met with the United Way of Greater New Bedford, who also reported few interactions with French-Creole speaking populations in New Bedford. Further outreach was made to the Evangelical Church of Jesus Christ, a Haitian church located in Dartmouth, MA, however the communication was met with no response from church leaders.

The results of the outreach efforts indicate that the Haitian community is not a significant population in the SRTA service area or that they are seeking assistance or participating with the traditional community service agencies. Based on those meetings and conversations, it is reasonable to assume that French Creole is an unlikely language for SRTA to encounter, however will provide translation of vital documents and will provide accommodations for interpretive services if requested.

Factor 2 – The frequency with which LEP persons come in to contact with the program

Statutory requirements that enable regional transit authorities in Massachusetts mandate that all transit operations must be carried out by a contracted operating company, not directly operated by the staff of authority. South Coast Transit Management (SCTM) is the operating company under contract with SRTA to provide fixed route, demand response, and ticket sales services. SCTM reports encountering Portuguese and Spanish speaking customers on a regular basis and very few interactions with customers speaking different languages.

Fixed route ticket sales are available at both SRTA terminals (Fall River and New Bedford) at the ticket sales windows and the ticket vending machines. SCTM employs ticket agents and supervisors that are fluent in Portuguese and Spanish and the ticket vending machines provide both language options. For qualified eligible customers, Demand Response service is available with trips scheduled by telephone. The call centers are staffed with call takers that are fluent in Spanish and Portuguese available to book customer trips.

Customer complaints, Demand Response applications, and discount fare cards are handled by SRTA staff in the authority main office. SRTA interacts with LEP customers regularly, and

employs staff fluent in Spanish; if Portuguese translation is necessary, SCTM can provide a fluent staff person with short notice.

In June, 2018, the Southeastern Regional Planning Economic and Development District conducted on-board passenger surveys to develop a demographic profile of SRTA customers; language proficiency was included as a question on the survey. Surveys were distributed in English, Portuguese, and Spanish. There were two questions that pertained to language, one which asked the respondent to indicate their proficiency in English, and the second to indicate their language spoken at home; responses to both questions were further categorized based on the minority status of the respondent.

With regards to English proficiency, eighty-eight percent of the survey takers responded to the question and of the responses: ninety percent indicated they speak English well, eight percent indicated they speak English not well, and two percent indicated they do not speak English. With regards to language spoken at home, seventy-five percent of survey takers responded to the question and of the responses: seventy-seven percent speak English, seventeen percent speak Spanish, and six percent speak a language other than English (information was not included with the results that indicated which languages were spoken).

The results of the survey support the data provided by the ACS and indicate that other than English, Spanish is the most prevalent language spoken by SRTA customers.

Factor 3 – Nature and importance of the program

The nature of fixed route and demand response service plays a vital role in the lives of SRTA customers. For many customers, public transportation is the only option available to travel locally, providing transportation for employment, education, medical, shopping, and social visits. Because of this, it is of utmost importance that language needs of SRTA customers are accommodated to the furthest extend possible.

Fixed route is the most widely used service SRTA offers, providing more than 2.5 million trips per year. Fixed route information is provided in Spanish and Portuguese in form of translated schedules and route information and is available at the Fall River and New Bedford terminals and on the SRTA website. Ticket vending machines offer Spanish and Portuguese in addition to English, and terminal staff are fluent in either language. Several operators are fluent in either Spanish or Portuguese, and all the vehicles are equipped with two-way radios to let the dispatchers know if language assistance is needed.

SRTA is currently underway with a technology upgrade project that will provide audio announcements on all fixed route vehicles, provide real-time information signs in the terminals, and provide a web-based application to provide customers real-time arrival information in a web browser or smart phone. The equipment upgrade will enhance the riding experience for Spanish speaking customers because the in vehicle public service announcements will be made in Spanish and in English; stop announcements are limited to the names of the stop cross streets, and therefore will not be translated.

Demand Response service is the curb-to-curb service provided for qualified eligible applicants. Once approved for the service, customers can call the day prior to a needed trip and schedule an appointment to be picked up and dropped off at the locations of their choosing. The call center is staffed with Spanish and Portuguese speakers to assist customers with booking trips.

Customer complaints are an important way to receive feedback from customers and identify trends needing customer service improvements. Customer complaints are typically received by SRTA staff in the administration office and addressed by SCTM. Complaints are classified as a civil rights discrimination complaint, a disability discrimination complaint, or a general customer service complaint. Customer service complaints are generally submitted via telephone, however civil rights and disability discrimination complaints are accompanied with the complaint form. The civil rights and disability discrimination complaint forms are translated in all Safe Harbor languages, with additional translation available upon request. If language assistance is needed for a telephone complaint, the caller is connected with a staff person fluent in either Spanish or Portuguese.

Periodically, SRTA will undergo service planning initiatives with the intent of better aligning service with the demands of the customers. Effective planning includes the public during the decision-making process, maintains transparency, and is responsive to the input provided by the public. To ensure that planning is as inclusive as possible, language assistance is integral to the process. All advertisements are provided in English, Spanish, and Portuguese and posted at the terminal and on buses in the community affected by planning process. All advertisements include language to indicate that translation services are available upon request, however all public meetings include staff that speaks either Spanish or Portuguese.

Factor 4 – Resources available for LEP outreach

Conducting effective outreach to LEP persons is important to ensuring equitable access to public transit services. Ensuring that vital information regarding transit service is available and understandable is central to transit operations. SRTA provides translation and interpretive services to the fullest extent possible considering the resources available to implement language assistance. Resources for language services are limited, however, SRTA has been able to incorporate language assistance in the operating budget without undue burden on other essential elements of the overall transit operations.

The most effective method of providing language assistance in terms of cost management and customer service is hiring staff that is fluent in languages other than English. The majority of non-English speakers in the SRTA service area speak either Portuguese or Spanish and both SCTM and SRTA employ staff that are fluent in either language. These staff persons are readily available to speak with customers if language assistance is needed. In partnership with the regional planning agency, SRPEDD, SRTA is able to provide Portuguese and Spanish translations for schedules, demand response applications, customer complaint forms, and public notices for planning initiatives and service changes. Staff fluent in Portuguese and Spanish are available at all public meetings.

SRTA uses technology to provide language assistance where it is feasible and cost effective. The SRTA website uses a translator application that allows much of the site content to be translated into several dozen languages. The translation application uses Google's computer language translation, which is less accurate than translation provided by a human translator, but allows SRTA to provide basic language assistance in almost any language likely to be encountered. SRTA is currently installing a technology system to provide audio announcements in the fixed route vehicles and terminals in Spanish; the language spoken by the majority of non-English speaking customers.

Language assistance for languages other than Portuguese or Spanish are infrequent, however SRTA has the budgetary capacity to address requests on an as-needed basis.

4.2. Implementation Plan

The Four Factor Analysis established the languages and extent to which assistance should be provided in those languages. Implementing the assistance and monitoring the implementation is how SRTA can ensure that language assistance is provided in a meaningful and effective manner. The Implementation Plan is a working document and reference and is formally updated on a triennial basis that coincides with the Title VI report and plan.

4.3. Notice of Language Assistance

The availability of staff to interpret and having vital documents translated are useful and necessary parts of implementing the Language Access Plan, however if LEP customers are not aware language assistance is available, the services go unused. To ensure that LEP customers are made aware of language assistance services, a statement indicating language assistance is available in Spanish or Portuguese on the Title VI Notice to Beneficiaries; a notice that is displayed in all public spaces of SRTA including in terminals, in fixed route vehicles, in demand response vehicles, and in the reception area of the SRTA Administration office. Additionally, notices posted for service changes or for public meetings are prepared in English, Spanish, and Portuguese and posted in public spaces pertinent to the meeting being held. The notices are posted in conspicuous locations and prepared in a size and font that are easy to read and are grammatically correct for the language in which it is presented.

4.4. Monitor

Implementing the Language Assistance Plan begins by monitoring current language assistance practices. Monitoring occurs through:

- Collecting demographic data and conducting surveys to document the presence of LEP persons likely to be served by SRTA;
- Maintaining records that indicate where language assistance was requested by or provided to customers;
- Reviewing language assistance policies;
- Reviewing staff training procedures; and
- Reviewing vehicles and terminals for language assistance notices.

Monitoring is conducted formally on a triennial basis to coincide with the update of the Language Access Plan. Informal monitoring occurs on an ongoing basis and is in the form of SRTA staff observations of SCTM operations to ensure compliance with the Language Access Plan and LEP policies.

4.5. Evaluate

Evaluating the results of the monitoring program is crucial for preparing plan updates and ensuring that the policies and practices are appropriate for providing language assistance to LEP persons. Evaluation includes:

- Analyzing demographic data and comparing against historic data to identify the presence of LEP persons in the SRTA service area;
- Understanding how LEP populations are changing;
- Analyzing survey data to identify how the LEP customer base is changing; and

- Evaluating the frequency of contact and the nature of that contact with LEP customers to determine if outreach efforts are effectively reaching LEP customers.

The results of the monitoring evaluation are used to develop and update the Language Access Plan, policies, and procedures. The Language Access Plan is updated on a triennial basis to coincide with the Title VI report; LEP policies and procedures are updated at minimum with the Language Access Plan or if results of a complaint investigation determine a deficiency in LEP policies or procedures. Since the last plan update, SRTA or SCTM have not had any complaint investigations result in modification to LEP policies or procedures.

4.6. Staff Training

Training staff to properly address the needs of LEP customers is an ongoing effort and begins with new hires and continues through the entirety of an employee's tenure with SRTA and with SCTM. All new hires receive LEP training to ensure understanding of the LEP policies of SCTM and SRTA. Tenured employees receive LEP training when LEP policies change to ensure understanding of the new policies and how they may differ from previous policies. Employees receive additional training when a valid complaint regarding LEP related issues is submitted by a customer. Additional training is provided to dispatchers and call takers since that staff is the most likely to interact with LEP customers when scheduling demand response trips.

5. Demographic Data and Maps

5.1. Service Area Demographic Profile

The SRTA service area is home to 308,614 residents according to the 2010 U.S. Census. Population is dispersed across the ten communities of the SRTA service area, but is most concentrated in the cities of Fall River and New Bedford. The 2010 U.S. Census reports minority status and identified 41,305 (13.38%) minority residents in the SRTA service area. The American Community Survey (ACS) 2016 Five Year Estimate was used to identify the low-income population of the SRTA service area; the total service area population reported by the ACS was 300,113 with a low-income population of 48,937 (16.31%). The difference in total population between the 2010 U.S. Census and the 2016 American Community Survey is due to different sampling methods employed by the United State Census to develop the demographic data. The 2010 U.S. Census population number is the most accurate figure for the SRTA service area population because it is derived from the decennial census in which all persons are counted. The American Community Survey data is derived from intermittent surveys and extrapolated to generate regional figures.

5.2. Minority Classification

In accordance with the requirements set forth in Title 49 CFR Section 21.9(b), SRTA keeps records that indicate the presence of minority populations within the service area and is organized by Census tracts. The service area wide minority population of 13.38% of the total population means that any Census tract that has a minority population that exceeds 13.38% of the total Census tract population is identified as a minority Census tract. The SRTA service area is home to 81 Census tracts, 35 of which exceed 13.38% of the population identified as minority. All 35 minority Census tracts are located in either the city of Fall River or New Bedford.

5.3. Service Area Maps

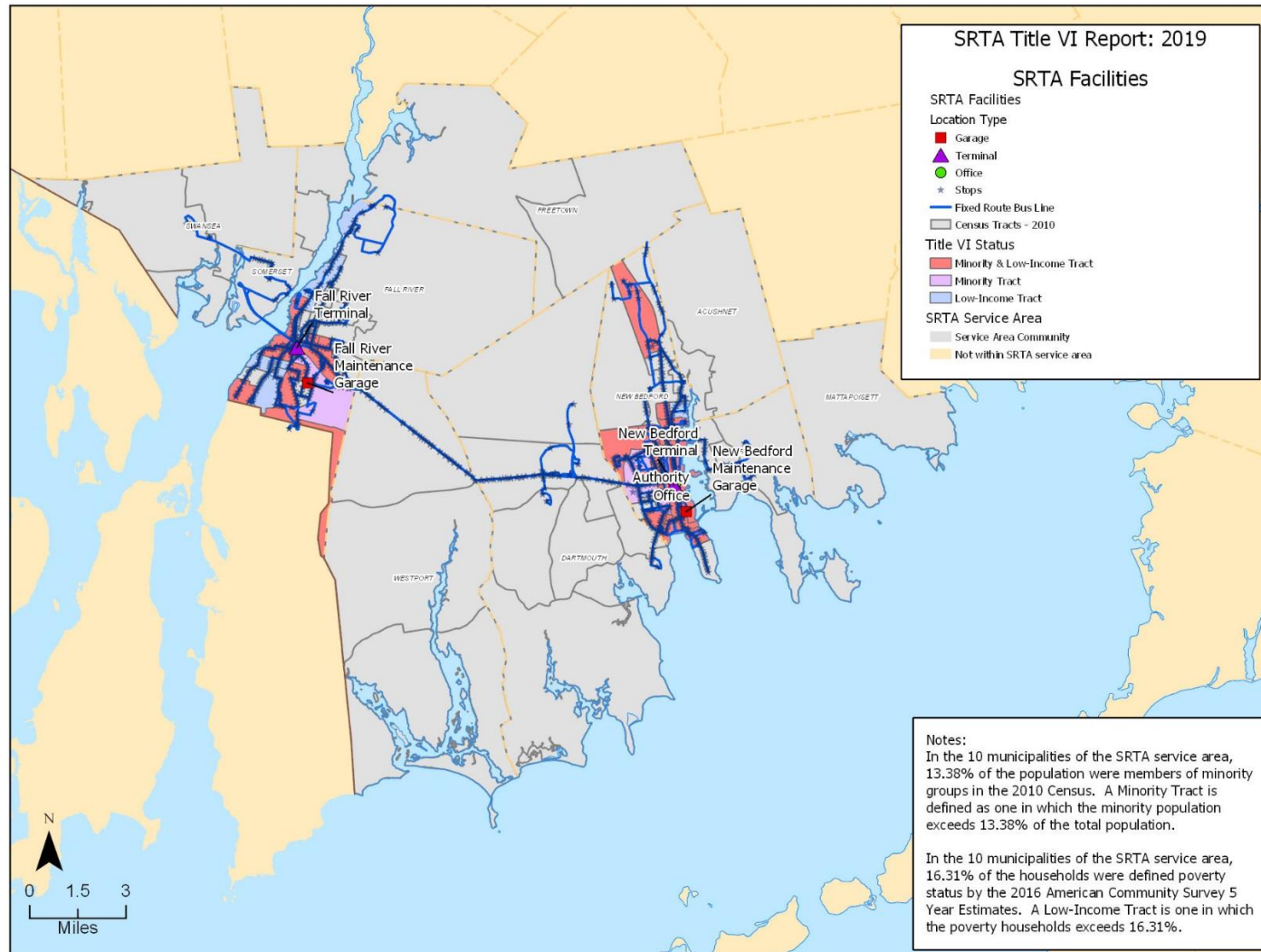


Figure 4: SRTA Facilities Map

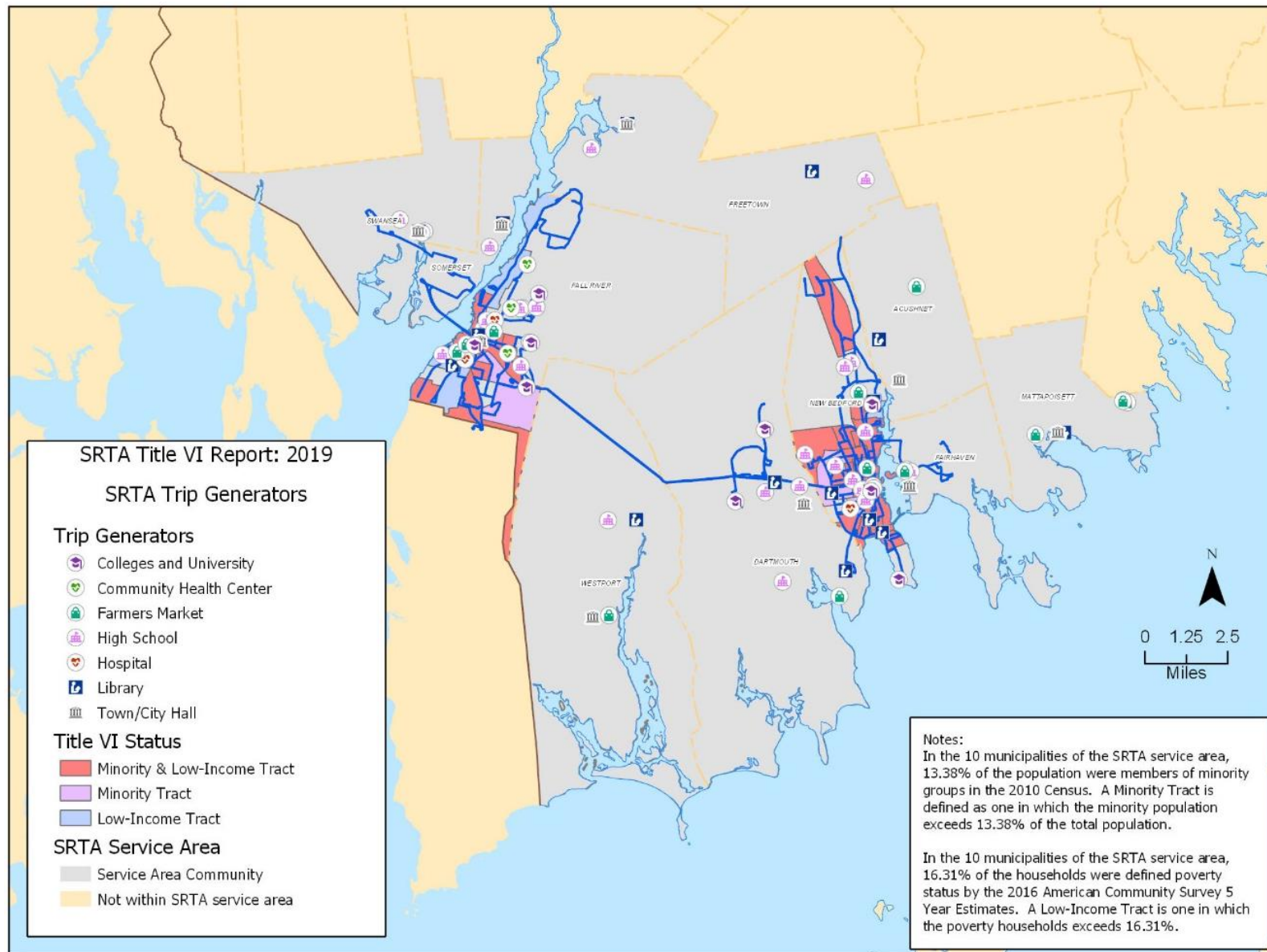


Figure 5: SRTA Trip Generators Map

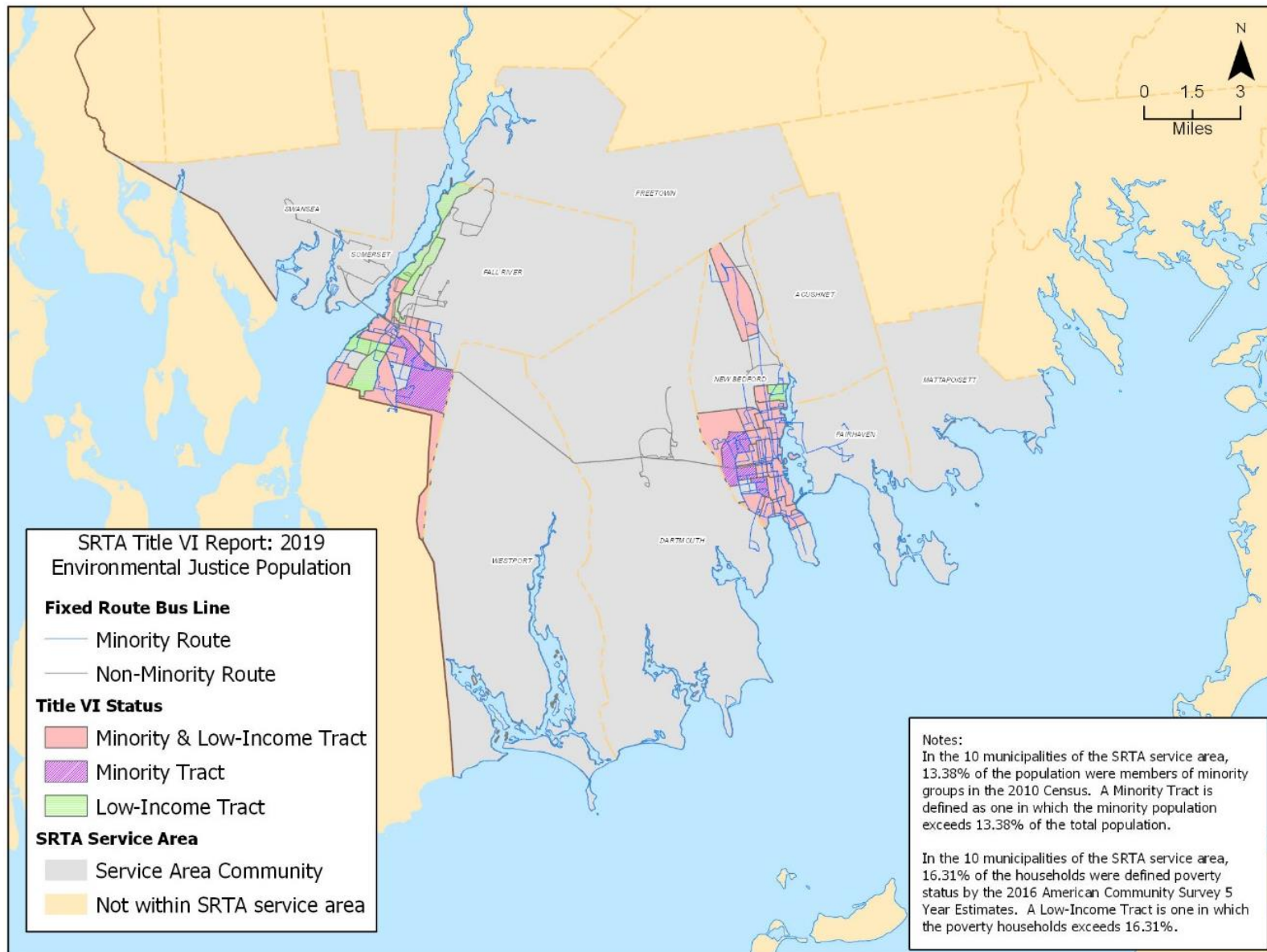


Figure 6: SRTA Environmental Justice Population Map

5.4. Route Classification

SRTA has identified the routes which predominantly serve minority populations present in the SRTA service area. Chapter I.5.s of FTA Circular 4702.1B defines a minority route as “one in which at least 1/3 of its total revenue mileage in a Census block or block group...with a percentage of minority population that exceeds the percentage of minority population in the transit service area.” As identified in Section 5.3 of this report, the SRTA service area minority population is 13.38% of the total population. SRTA has classified all routes as either minority or non-minority based on this definition. The routes are listed below:

Route	Route Status	Route Type
FR1	Non-minority	Urban
FR10	Minority	Urban
FR14	Non-minority	Suburban
FR2	Non-minority	Urban
FR3	Minority	Urban
FR4	Non-minority	Urban
FR5	Minority	Urban
FR6	Minority	Urban
FR7	Minority	Urban
FR8	Non-minority	Urban
FR9	Minority	Urban
NB1	Minority	Urban
NB10	Non-minority	Suburban
NB11	Minority	Suburban
NB2	Minority	Urban
NB3	Minority	Urban
NB4	Minority	Urban
NB5	Minority	Urban
NB6	Minority	Urban
NB8	Minority	Urban
NB9	Non-minority	Suburban
NBNES	Non-minority	Suburban

Table 2: SRTA Route Classification

5.5. Demographic Profile of Customers

In addition to analyzing demographic data provided by the U.S. Census, SRTA is required to collect and report demographic data for customers. The data on customers is important to collect because it provides insight into the demographic make-up of the customer base, provides context to the U.S. Census data, and is invaluable when analyzing routes, route alignments, and route schedules.

The most recent customer data was collected by the Southeastern Regional Planning and Economic Development District through in-person surveys conducted onboard SRTA buses. The survey was conducted over the course of several days in the month of June 2018 and produced a statistically significant sample of SRTA customers and provides a 90% confidence interval with a 10% margin of error. The sampling method collected distributed the survey effort

across all SRTA route and resulted in a sample that represented the SRTA service across all routes, times of the day, and schedule type. Surveys were provided in English, Portuguese, and Spanish.

The results of the customer survey indicated that 47% of passengers identify as minority; 47% of passengers also identified as low-income. The results of the survey revealed much higher percentages of minority and low-income riders than the U.S. Census data. When questioned about the frequency of use, the majority of customers indicated that they ride several times each week. Data was also collected on fare media most frequently used by customers and indicated that cash was the most prevalent form of fare media despite the availability of smart cards that provide discounted fares when used. The fare media survey results are supported by data collected by SRTA fareboxes.

The results of the customer surveys suggest that the typical SRTA rider is low-income, rides frequently, and pays with cash; the results were similar for both minority and non-minority riders. The full report based on the survey responses is available in Appendix B.

6. Service Monitoring Program and Results

6.1. Monitoring Program

SRTA has adopted system-wide service standards and policies that establish minimum thresholds for system performance. The requirement for SRTA to set system-wide service standards and policies is set forth in FTA C 4702.1B, Chapter IV, Section 4. The intent with the service standards and policies is to establish reasonable and achievable levels of performance to ensure that transit service is provided in an effective manner. The service standards cover elements of the transit service that directly relates to the customers and include standards for: vehicle load by each mode, vehicle headway for each mode, on-time performance for each mode, service availability for each mode, distribution of transit amenities for each mode, and vehicle assignment for each mode. SRTA operates a single mode: fixed route bus.

The data used to monitor system performance was collected between July 1, 2016 and June 30, 2017. Data was recorded and compiled by the Southeastern Regional Planning and Economic Development District under the contract with SRTA and is based on the observations of 572 trips on fixed route service. The data collected produced a sample of service that provides a 90% confidence interval with a 10% margin of error based on the entire fixed route operations for the period it was collected. Data was collected by an on-board data collector by recording the date, time, location, and volume of passengers boarding or exiting the vehicle. The data was recorded by hand, entered into a database, and compiled to be used for analysis.

6.2. Vehicle Load

Vehicle load measures the number of passengers on-board at any one point in time. The measure is reported as a ratio of passengers on-board to the maximum load factor; the maximum load factor is the 1.5 times the vehicle seated capacity. The vehicle load ratio is recorded at each stop once all passengers on board have been counted. A score greater than 1.00 indicates that the maximum vehicle load was exceeded. The maximum observed vehicle load ratio was 0.98 with an average load ratio of 0.13. Maximum vehicle load for minority routes was 0.82 and 0.92 for non-minority routes; average load ratios were 0.12 and 0.16 respectively.

Based on the results of the monitoring, vehicle load did not exceed the maximum load factor on either minority or non-minority routes. Moreover, the maximum and average observed load ratio for minority routes were lower than the non-minority routes which indicates that there is no disparate treatment of minorities with regards to vehicle load.

The maximum load factor sets the high limit for passengers on-board, however a vehicle load ratio score approaching 1.00 indicates that one of every three passengers will not have a seat available. During periods of peak demand, it is expected that all seats are occupied and several passengers have to stand. This is not an ideal condition, but is tolerable during peak times. During off peak times, passengers should expect to find a seat upon boarding, so to determine the frequency with which seats are available, vehicle load was compared against the seated capacity for the vehicle. Similar to the maximum load factor, available seats were recorded at each observed stop once all passengers on board had been counted; of the 4,193 stop location counted, only at 24 locations (0.57% of all observations) did the passengers on board exceed the number of available seats. When compared against minority and non-minority routes, the results were similar: only 18 of 2,863 (0.63%) observations on minority routes and 6 of 1,330 (0.45%) observations on non-minority routes did the number of passengers on board exceed the number of available seats.

The results of both the maximum load analysis and the available seat analysis indicate that SRTA vehicles are rarely crowded to the point where passengers have no choice but to stand. The occurrence of standing room only is unpredictable and occurs in near equal frequency on minority and non-minority routes alike.

6.3. Vehicle Headway

Vehicle headway refers to the amount of time between two vehicles traveling in the same direction on the same route; it measures the frequency of vehicle arrivals. The headways for SRTA are set based on route length and service demand and vary by service schedule. SRTA operates two service schedules: Weekday and Saturday (service on state and federal holidays observes a Saturday schedule). Weekday schedules vary throughout the year, several routes have additional service in the AM and PM to provide additional capacity to handle peak hour demand while school is in session. The headways for each route are shown below and include the minority status of the route and the route type for each route.

Route	Minority Status	Route Type	Weekday Headways	Saturday Headway
FR1	Non-Minority Route	Urban	30 Min	30 Min
FR2	Non-Minority Route	Urban	30 Min	60 Min
FR3	Minority Route	Urban	30 Min	30 Min
FR4	Non-Minority Route	Urban	30 Min	60 Min
FR5	Minority Route	Urban	30 Min	30 Min
FR6	Minority Route	Urban	60 Min	60 Min
FR7	Minority Route	Urban	60 Min	60 Min
FR8	Non-Minority Route	Urban	30 Min	60 Min
FR9	Minority Route	Urban	30 Min	60 Min
FR10	Minority Route	Urban	60 Min	60 Min
FR14	Non-Minority Route	Suburban	60 Min	60 Min
NB1	Minority Route	Urban	20 Min	40 Min
NB2	Minority Route	Urban	20 Min	40 Min
NB3	Minority Route	Urban	30 Min	60 Min
NB4	Minority Route	Urban	30 Min	45 Min
NB5	Minority Route	Urban	45 Min	60 Min
NB6	Minority Route	Urban	45 Min	60 Min
NB8	Minority Route	Urban	40 Min	40 Min
NB9	Non-Minority Route	Suburban	30 Min	60 Min
NB10	Non-Minority Route	Suburban	60 Min	60 Min
NB11	Minority Route	Suburban	30 Min	30 Min
NBNES	Non-Minority Route	Suburban	40 Min	40 Min

Table 3: SRTA Route Headways

Since the previous Title VI report was submitted, no changes have been made to scheduled headways for SRTA routes. The headway policy establishes minimum headways by route time and for time of day. The policy identifies two route types: Urban and Suburban. Urban routes are those that operate the majority of their revenue miles with the geographic limits of either the City of Fall River or New Bedford; Suburban routes are those that operate the majority of revenue miles outside of either Fall River or New Bedford. The policy is more complex in

defining the minimum headways for each type of route and is based first on scheduled service day and then defines periods of the day for different headways to be applied.

	AM Peak	Mid-day	PM Peak	Other
Weekday	6 AM - 9 AM	9 AM - 3:30 PM	3:30 PM - 6:30 PM	6:30 PM - 10 PM
Urban	30	90	30	150
Suburban	60	90	60	N/A
	Base			Other
Saturday	8:30 AM - 6:30 PM			N/A
Urban	60			N/A
Suburban	120			N/A

Table 4: SRTA Headway Policy

The Saturday headway policy allows for 60 minutes for urban routes and 120 minutes for suburban routes; all routes adhere to the policy. The Weekday headway policy is more complicated. Urban route headway policy allows for 30 minutes from the start of service to 9:00 AM, 90 minutes between 9:00 AM and 3:30 PM, 30 minutes between 3:30 PM and 6:30 PM, and 150 minutes after 6:30 PM. The Suburban route headway policy allows for 60 minutes from the start of service to 9:00 AM, 90 minutes between 9:00 AM and 3:30 PM, and 60 minutes after 3:30 PM. Based on these headway policies, several routes have headways that are non-compliant during some portion of the service day. The non-compliant headways occur during the AM and PM peak periods (start of service day to 9:00 AM, and 3:30 PM to 6:30 PM). The non-compliant routes are: NB8 (40-minute headway), NB5 (45-minute headway), NB6 (45-minute headway), FR6 (60-minute headway), FR7 (60-minute headway), and FR10 (60-minute headway), all are designated as minority routes.

Non-compliance with the headway standard is a difficult issue to address and is as much caused by the policy as it is by the service. The routes that are found to be non-compliant are not routes that would be targeted for service increases that would bring them into compliance with the policy. The routes are all observed to perform below average for ridership when compared against the entire SRTA service and generally serve areas that do not generate high demand for transit. Bringing these routes into compliance with the policy may require more than simply increasing the frequency of service, route realignment may be appropriate before service frequency increase. Additionally, it may be necessary to re-evaluate the headway policy to ensure that the method of defining route types and the headways applied to the route types is appropriate for the environment in which they operate.

The policy should be updated since SRTA does not adjust headways peak hour service. Service headways remain consistent throughout the service day and do not vary by time of day. The exception to this is that certain routes in Fall River include an additional AM and PM trip during the school year to meet the demand of students. Under that current policy, the time defined for the PM peak begins at 3:30 PM and ends at 6:30 PM however the additional PM trips added to Fall River routes begin before the policy's PM peak period. This mis-alignment of policy and practice make compliance more challenging since the policy recognizes a PM peak that does not coincide with demand.

The results of the observations do not represent a disparate impact on minorities. When headways are compared based on minority status, minority urban routes have shorter headways than non-minority urban routes; the only minority suburban route has an equal or shorter headway than all non-minority suburban routes. When considering the distribution of service and the headways provided on that service, there does not appear to be a

discriminatory practice in setting headways that would have a disparate impact on minority populations.

6.4. On-Time Performance

On-time performance measures the difference between the scheduled time published on time tables and the actual departure time from the trip origin. The on-time performance policy allows for departures within a window of one (1) minute prior to and five (5) minutes after the published time for routes with a headway of thirty minutes or less and one (1) minute prior to and ten (10) minutes for routes with a headway greater than thirty-minutes. SRTA's objective is to operate all trips with a minimum of eighty-five percent of departures on-time.

Based on the policy, the observed on-time performance for all routes observed was 90%. There were no early departures, all trips that did not meet the threshold resulted in a late departure. When compared against the minority status of the routes, minority routes achieved a 90% on-time performance and non-minority routes achieved a 91% on-time performance. Based on these results, no disparity was observed between the on-time performance of minority or non-minority routes.

6.5. Distribution of Transit Amenities

SRTA maintains twenty-eight bus shelters; eleven of which are located in either a minority or low-income Census tract. No new shelters have been installed by SRTA since the last Title VI Report in 2016. Shelters are considered for stops that exceed 20 boardings per day or where multiple routes intersect. SRTA has limited jurisdiction to install shelters without the approval of the property owner that controls the site (site control can generally be defined as private ownership or municipal or state government ownership) and is subject to municipal review and approval. SRTA prefers to site shelters in publicly controlled right-of-way to ensure that the shelter will remain in place for the entirety of its useable life. SRTA encourages private property owners to install and maintain shelters to serve the riding public.

6.6. Vehicle Assignment

Vehicle assignment is made based on route geometry, historic and anticipated passenger volumes, and vehicle availability. The SRTA fleet of fixed route buses are comparably equipped with technology and comfort features; all vehicles are accessible for disabled customers. Vehicles are kept in a state of good repair and are only used in service if all equipment is functioning properly.

6.7. Service Availability

Service availability measures the population that has access to the transit system. The current standard is that 85% of the population within communities served by fixed route transit live within one-mile of the nearest fixed route transit line. SRTA service area encompasses ten communities (Acushnet, Dartmouth, Fairhaven, Fall River, Freetown, New Bedford, Mattapoisett, Somerset, Swansea, and Westport), however the towns of Acushnet and Mattapoisett are not served by the fixed route system. Freetown is only served by the portion of the Fall River Route 2 in the Fall River Industrial Park and is considered unserved for the purpose of this evaluation because there are no residential areas served by the fixed route system in Freetown.

The combined population of the seven communities served by fixed route transit is 283,396. Using a GIS analysis, a one-mile "as-the-crow-flies" buffer was applied to all fixed route transit

lines. To determine the population within the one-mile buffer, population density for each of the Census tracts included in the buffer was calculated and applied to the area that was included in the buffer. The resulting calculation provided a population estimate of 231,74. Based on this result, 82% of the population in communities served by fixed route transit are within one mile of the fixed route transit system and does not meet the standard of serving 85% of the population.

Failure to meet the standard does not necessarily indicate poor performance on the part of SRTA and does not indicate discrimination against minority populations in the availability of service. All minority Census tracts in the SRTA service area are served by the fixed route transit system, and in many cases, are served by several routes. Moreover, the fixed route system operates in the most densely populated areas of the service area, meaning that expanding service to comply with the standard mean operating in areas where population density is low.

Further analysis of the service area population demographics suggests that a more appropriate measure better reflect the demand for service is needed. The development patterns of the service area, population densities of the communities served by SRTA, and the demographic profile of SRTA customers have resulted in a concentration of service in the dense urban cores. This is to be expected for a transit system with the fleet size and operating budget of SRTA; service should be focused where it is most likely to be utilized. An indicator for transit demand is households without access to a vehicle, a data point that is reported by the American Community Survey and suggests a dependency on walking, bicycling, or transportation provided by a third party. Data on vehicles per household is collected by the American Community Survey and reported on table B25044 which estimates the number of households and the vehicles available to the residents of the household. The data includes counts for zero, one, two, three, four, and more than five vehicles available to household occupants; households with zero vehicles were chosen for the analysis.

Using GIS, a half-mile walking distance was calculated from each SRTA bus stop to establish a service area for fixed route transit stops. The analysis develops a polygon based on the distance traveled on the roadway network and is a more accurate representation of the walking approach to a bus stop than using the “as-the-crow-flies” buffer. A half-mile distance was chosen as this is generally regarded in transit as the maximum distance a typical customer will walk to a transit stop. To determine the number of households within the polygon, the area of was multiplied by the ratio of households to area for Census tract or tracts intersected by the polygon. The results produced an estimate of the number of households in the polygon which was then multiplied by the proportion of households with zero vehicles in the intersecting Census tracts. The analytical process produced an estimate of households with zero vehicles within one half mile walk of SRTA fixed route bus stops.

The SRTA service area has 146,029 households across all ten communities in the service area; 18,432 of which are reported as having zero vehicles (13%). The results of the analysis indicate that 86,069 (59%) of the service area households are within one half mile of the fixed route system: 17,778 of which are reported as having zero vehicles (21%). Based on these results, SRTA is providing fixed route service within one half mile of 96% of all households reported as having zero vehicles.

	All Households	Zero-Vehicle Households	% Zero-Vehicle Households
Service Area	146,029	18,432	13%
Half-mile of bus stop	86,069	17,778	21%
% within half-mile of bus stop	59%	96%	

Table 5: SRTA Household Service Availability Matrix

An appropriate standard for service availability would be that 95% of households without access to a private vehicle are within a one-half mile walk of an SRTA bus stop. This standard is a much better indicator of transit demand and availability for the populations most likely to use transit than the current standard which neither represents an acceptable walking distance to transit or represents the populations most likely to use transit.

7. Systemwide Service Standards and Policies

7.1. Vehicle Load

Vehicle load measures the number of passengers on-board at any point in time while the vehicle is in revenue service. The maximum capacity of passengers is based on the number of seats installed by the manufacturer and is set by a ratio that is 1.5 of the seated capacity. SRTA operates three vehicle types in its fleet: 30-foot, 35-foot, and 40-foot buses. The table below outlines the maximum load for each vehicle type. SRTA monitors vehicle load on a triennial basis to coincide with the Title VI Report.

Vehicle Type	Seated Capacity	Maximum Capacity
30 Foot Bus	30	45
35 Foot Bus	35	53
40 Foot Bus	38	57

Table 6: SRTA Vehicle Capacity

7.2. Vehicle Headway

Vehicle headway refers to the time between arrivals at the same stop on the same route on the same service day. Vehicle headways are the maximum amount of time that a passenger will wait for a vehicle in revenue service to arrive at a stop. SRTA operates two service schedules: Weekday – Monday through Friday from 5:20 AM to 10:10 PM; Saturday – from 7:00 AM to 8:00 PM; there is no service on Sunday. It is the policy of SRTA to operate all fixed route service with headways no greater than sixty-minutes.

7.3. On-Time Performance

SRTA defines the acceptable window of on-time performance to be one (1) minute prior and five (5) minutes after the scheduled departure time from the trip origin for routes with headways of thirty (30) minutes or less; and one (1) minute prior and five (10) ten minutes after the scheduled departure time from the trip origin for routes with headways greater than thirty (30) minutes. SRTA will operate all routes with a minimum of eighty-five (85%) percent of departures on-time.

7.4. Service Availability

SRTA distributes fixed route transit service so that ninety-five (95%) percent of households with zero-vehicles are within a half-mile walk to the nearest transit stop.

7.5. Distribution of Transit Amenities Policy

SRTA maintains twenty-eight bus shelters; eleven of which are located in either a minority or low-income Census tract. No new shelters have been installed by SRTA since the last Title VI Report in 2016. Shelters are considered for stops that exceed 20 boardings per day or where multiple routes intersect. SRTA has limited jurisdiction to install shelters without the approval of the property owner that controls the site (site control can generally be defined as private ownership or municipal or state government ownership) and is subject to municipal review and approval. SRTA prefers to site shelters in publicly controlled right-of-way to ensure that the shelter will remain in place for the entirety of its useable life. SRTA encourages private property owners to install and maintain shelters to serve the riding public.

7.6. Vehicle Assignment Policy

Vehicle assignment is made based on route geometry, historic and anticipated passenger volumes, and vehicle availability. The SRTA fleet of fixed route buses are comparably equipped

with technology and comfort features; all vehicles are accessible for disabled customers. Vehicles are kept in a state of good repair and are only used in service if all equipment is functioning properly.

8. Service and Fare Changes

8.1. Major Service Change Policy

A major service change is defined as one in which more than twenty-five percent of the total route mileage or revenue mileage is either increased or decreased. It is the policy of SRTA to engage the public for major service changes and address adverse effects of those changes. Service changes that have potential for adverse effects include route elimination, shortlining, rerouting, and headway changes. At a minimum, SRTA will:

- Develop and implement a public participation plan to engage underserved populations including minorities, low-income, LEP, and the disabled;
- Conduct a service equity analysis to determine adverse effects, disparate impact and/or disproportionate burden on minority and low-income communities;
- Provide a method for the public to provide comments on the proposed service changes and the equity analysis;

8.2. Disparate Impact Policy

A disparate impact occurs when a proposed fare or major service change affects a minority population twenty percent more than a non-minority population. Changes that affect route alignment are evaluated against the existing condition of the route subject to the change. Changes affecting span of service or headways are evaluated against the existing systemwide conditions. If a proposed change is determined to have a disparate impact, SRTA will take corrective action to mitigate adverse affects of the change.

It is the goal of SRTA to avoid, minimize, or mitigate adverse affects of proposed service changes. Changes may proceed with a documented disparate impact if a substantially legitimate justification is demonstrated and there are no comparably effective alternative practices that would result in a lesser disparate impact.

8.3. Disproportionate Burden Policy

A disproportionate burden occurs when a proposed fare or major service change affects a low-income population twenty percent more than a non-low-income population. Changes that affect route alignment are evaluated against the existing condition of the route subject to the change. Changes affecting span of service or headways are evaluated against the existing systemwide conditions. If a proposed change is determined to have a disparate impact, SRTA will take corrective action to mitigate adverse affects of the change.

It is the goal of SRTA to avoid, minimize, or mitigate adverse affects of proposed service changes. Changes may proceed with a documented disproportionate burden if a substantially legitimate justification is demonstrated and there are no comparably effective alternative practices that would result in a lesser disproportionate burden.

8.4. Findings of Service Change Equity Analysis

SRTA implemented two service changes that met the requirements of a Major Service Change between April 1, 2016 and March 31, 2019. The descriptions of the service changes and results of the service change equity analysis are below:

New Bedford Route 9 – Intercity Route - 2016

Service increase from sixty-minute headway to thirty-minute headway for weekday service between 9 AM and 6 PM. No changes made to early morning, evening/night service, or Saturday service.

The service change equity analysis identified several areas of potential impact to minority and low-income populations, however, due to the service increase, there were no adverse impacts requiring modification of the proposal or mitigation of the proposed service changes.

Fall River Route 6 – Pleasant Street - 2016

Service extension from the end of the existing route to Father DeValles Boulevard in Fall River to serve a business park. The extension added service to the destination on all weekday outbound trips. No change was made to the Saturday service.

The service change equity analysis did not identify any adverse impacts related to the proposed service change.

8.5. Findings of Fare Change Equity Analysis

No changes were made to SRTA fares since April 1, 2016.

9. References

- 49 U.S.C. Sections 5307 as amended. (2012).
- 65 FR 50121. (August 11, 2000). Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency.
- American Community Survey. (2015). Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over.
- American Community Survey. (2016). Poverty Status in the Past 12 Months by Household Type by Age of Householder.
- American Community Survey. (2016). Tenure by Vehicles Available.
- Federal Transit Administration. (2012). *FTA C 4701.1B: Title VI Requirements and Guidelines for Federal Transit Administration Recipients*. Washington, D.C.: U.S. Department of Transportation.
- Mass. Gen. Laws ch. 161B. Transportation Facilities, Highways Systems, and Urban Development Plans. (2013).
- Southeastern Regional Planning and Economic Development District. (2018). *Demographic Profile of Southeastern Regional Transit Authority Riders*. Taunton, MA: Southeastern Regional Planning and Economic Development District.
- Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C Section 2000d. (1964).
- United States Census Bureau. (2010). Profile of General Population and Housing Characteristics: 2010 Census Summary File 1.

APPENDIX A

List of Title VI Complaints

BASIS OF COMPLAINT RACE, COLOR &/OR NATIONAL ORIGIN	SUMMARY OF COMPLAINT	DATE SUBMITTED	DATE OF ALLEGED INCIDENT	COMPLAINT COMPLETED?	ACKNOWLEDGEMENT DUE	ACKNOWLEDGEMENT SENT	DECISION TO INVESTIGATE?	COMPLAINT NOTIFICATION DUE	ACTUAL DATE COMPLAINANT NOTIFIED	INVESTIGATION COMPLETION DATE	ACTUAL INVESTIGATION COMPLETED	COMMENTS	ACTIONS TAKEN	STATUS
N/A	Customer alleged discrimination based on sexual orientation	6/12/2018	6/12/2018	6/19/2018	6/17/2018	6/13/2018	NO	6/17/2018	6/13/2018	6/19/2018	6/19/2018	Complaint not valid. Customer story changed from initial complaint during the investigation.	No action taken	Closed
N/A	Customer alleged discrimination based on sexual orientation	6/2/2018	6/2/2018	6/6/2018	6/7/2018	6/4/2018	NO	6/7/2018	6/4/2018	6/6/2018	6/6/2018	Customer provided erroneous information regarding the time and date of the complaint.	No action taken	Closed
NATIONAL ORIGIN	Customer alleged driver made derogatory comments regarding her speaking Spanish.	3/6/2018	3/6/2018	3/9/2018	3/11/2018	3/7/2018	NO	3/11/2018	3/7/2018	3/9/2018	3/9/2018	The interaction between the driver and the customer could not be verified with video or audio recordings. The complaint was determined to be not valid.	No action taken	Closed
NATIONAL ORIGIN	Customer alleged driver refused to lower wheelchair ramp because she made the request in Spanish and was stopped in a Spanish speaking neighborhood.	2/20/2018	2/20/2018	2/26/2018	2/25/2018	2/23/2018	NO	2/25/2018	2/23/2018	2/26/2018	2/26/2018	The interaction between the driver and the customer could not be verified with video or audio recordings. The complaint was determined to be not valid.	No action taken	Closed

NATIONAL ORIGIN	Customer alleged that driver did not return invalid currency used to pay for fare because she speaks Spanish.	6/14/2016	6/14/2016	6/15/2016	6/19/2016	6/15/2016	NO	6/19/2016	6/15/2016	6/15/2016	6/15/2016	Customer could not provide details when staff followed up to investigate the complaint.	No action taken	Closed
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APPENDIX B

Demographic Profile of SRTA Customers

**Demographic Profile of
Southeastern Regional Transit Authority Riders**



**Prepared by:
Southeastern Regional Planning and Economic Development District
88 Broadway
Taunton, MA 02780
November 2018**

Federal Disclaimer

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Title VI and Nondiscrimination Notice of Rights of Beneficiaries

The Southeastern Massachusetts Metropolitan Planning Organization (SMMPO) through the Southeastern Regional Planning and Economic Development District (SRPEDD) operates its programs, services, and activities in compliance with federal nondiscrimination laws including Title VI of the Civil Rights Act of 1964 (Title VI), the Civil Rights Restoration Act of 1987, and related statutes and regulations. Title VI prohibits discrimination in federally assisted programs and requires that no person in the United States of America shall, on the grounds of **race**, **color**, or **national origin** (including **limited English proficiency**), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance. Related federal nondiscrimination laws administered by the Federal Highway Administration, the Federal Transit Administration, or both prohibit discrimination on the basis of **age**, **sex**, and **disability**. These protected categories are contemplated within SRPEDD's Title VI Programs consistent with federal interpretation and administration. Additionally, SRPEDD provides meaningful access to its programs, services, and activities to individuals with limited English proficiency, in compliance with US Department of Transportation policy and guidance on federal Executive Order 13166.

SRPEDD
Lilia Cabral
Title VI/Nondiscrimination Coordinator
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www.srpedd.org

Individuals seeking additional information or wishing to file a Title VI/Nondiscrimination complaint may contact the SRPEDD Title VI/Nondiscrimination Coordinator at the contact information here. All such complaints must be received, in writing, within 180 days of the alleged discriminatory occurrence. Assistance will be provided, upon request, to individuals unable to provide the complaint form in writing.

Massachusetts Public Accommodation Law (M.G.L. c 272 §§92a, 98, 98a) and Executive Order 526 section 4 also prohibit discrimination in public accommodations based on religion, creed,

Massachusetts Commission Against
Discrimination (MCAD)
One Ashburton Place, 6th Floor
Boston, MA 02109
617-994-6000
TTY: 617-994-6196

class, race, color, denomination, sex, sexual orientation, nationality, disability, gender identity and expression, and veteran's status, and SRPEDD and the SMMPO assures compliance with these laws. Public Accommodation Law concerns can be brought to SRPEDD's Title VI/Nondiscrimination Coordinator or to

file a complaint alleging a violation of the state's Public Accommodation Law, contact the

Massachusetts Commission Against Discrimination within 300 days of the alleged discriminatory conduct.

The SMMPO is equally committed to implementing federal Executive Order 12898, entitled “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.” In this capacity, the SMMPO identifies and addresses disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations. The SMMPO carries out this responsibility by involving minority and low income individuals in the transportation process and considering their transportation needs in the development and review of the SMMPO’s transportation plans, programs and projects.

English: If this information is needed in another language, please contact Lilia Cabral, SRPEDD’s Title VI Coordinator by phone at (508) 824-1367.

Portuguese: Caso esta informação seja necessária em outra idioma, favor contar o coordenador em Título VI do SRPEDD pelo telephone (508) 824-1367.

Spanish: Si necesita esta información en otro idioma, por favor contacte al coordinador de SRPEDD del Título VI al (508) 824-1367.

Introduction:

The Southeastern Regional Transit Authority (SRTA) as the recipient of Federal Transit Administration funds under Title 49 U.S.C. Chapter 53 is required to maintain a Title VI Program, and update the program every three years. As specified by FTA Circular 4701.1B dated October 1, 2012, “transit providers shall collect information on race, color, national origin, English proficiency, language spoken at home, household income, and travel patterns of their riders...” for the purpose of creating a demographic profile of ridership.

To satisfy this requirement, the Southeastern Regional Planning and Economic Development District (SRPEDD) conducted surveys of passengers, tabulated the completed surveys, and analyzed the results, which are presented in this report.

Survey Methods:

SRPEDD conducted passenger surveys at the New Bedford Terminal from June 12, 2018 until June 16, 2018; and at the Fall River Terminal from June 19, 2018 until June 23, 2018. Passengers were provided a two-page survey and asked to either complete the survey on-site or return a completed survey to either terminal no later than June 16, 2018 for New Bedford and June 23, 2018 for Fall River. The survey was available in English, Portuguese, and Spanish.

A total of 623 surveys were returned which provides a 4% margin of error (at the 95% confidence interval). Of the 623 returned surveys, 294 were identified as Minority, which provides a 6% margin of error (at the 95% confidence interval) for Minority responses; 329 returned surveys were identified as Non-Minority, which provides a 5% margin of error (at the 95% confidence interval) for Non-Minority responses.

Results:

Race and Ethnicity

The majority of respondents identify their race as White (53%), the next largest ethnic group is Hispanic (23%), followed by Black or African American (13%), and Cape Verdean (4%). Asian, American Indian, and Other received less than 3% of total responses.

Row Labels	Percentage of Race/Ethnicity of SRTA Riders
n=623	
American Indian or Alaska Native	<0%
Asian	2%
Black or African American	13%
Cape Verdean	4%
Hispanic or Latino	23%
Native Hawaiian/Pacific Islander	1%
Other	3%
White (Non-Hispanic)	53%

For the purpose of this analysis, survey responses were grouped into two categories: Minority and Non-Minority. The Minority category comprised of all respondents that did not identify as White (the majority of responses). The 47% of respondents from racial and ethnic groups that form the Minority rider group far exceeds the 13% of racial and ethnic minorities that reside within the SRTA service area as identified by the 2010 U.S. Census.

Minority Status	
n=623	
Minority	Not Minority
47%	53%

English Proficiency

English proficiency refers to a person's ability to read, write, speak, and understand English at a high degree of competence. More than 99% of the Non-Minority group respondents indicated that they speak English well as compared to 79% of Minority responses. The survey identified that 16% of Minority respondents do not speak English well and 5% do not speak English at all.

English Proficiency		
	Minority	Non-Minority
	n=261	n=289
Not at All	5%	<0%
Not Well	16%	0.69%
Well	79%	99%

Language Spoken at Home

English proficiency provides insight into how well the riding population speaks English, however learning the language spoken at home by riders provides insight into the languages most likely to be encountered by SRTA. The responses varied greatly between Minority and Non-Minority respondents: English was the most predominant language, and is spoken by 96% of Non-Minorities; 58% of Minorities speak English at home. Spanish was the second most predominant language spoken at home by Minorities (34%); 8% indicated a language other than English or Spanish. Spanish and other languages received a much lower response rate among Non-Minorities with 0.4% and 3.6% respectively. Eleven different languages were identified by survey respondents.

Language Spoken at Home		
	Non-Minority	Minority
	n=236	n=230
English	96%	58%
Spanish	0.4%	34%
Other	3.6%	8%

Annual Income

Response rates for annual income among Minority and Non-Minority groups were comparable across all income categories surveyed. The highest frequency of responses for both Minority (32%) and Non-Minorities (36%) indicated annual household income of less than \$10,000. The income category of \$10,000-14,999 garnered the next highest frequency of responses among Minorities (13%) and Non-Minorities (14%).

Of the respondents that indicated their annual household income, 99% of Minorities and 99% of Non-Minorities fall below the Household Income Average Median Value of \$48,409 within the SRTA Service Area.

Annual Household Income		
	Minority	Non-Minority
	n=259	n=207
<10K	32%	36%
10K-14,999K	13%	14%
15K-24,999K	21%	9%
25K-34,999K	3%	7%
35K-49,999K	6%	4%
50K-74,999K	3%	2%
75K<	1%	1%
Prefer not to Answer	21%	27%

Minority Status by Bus Route

In order to evaluate service changes for impacts on minority populations, SRTA must evaluate the proportion of riders who identify as minority on all of its services. SRTA has fixed routes in New Bedford, also serving Fairhaven and Fall River, also serving Swansea. Using survey data, SRPEDD evaluated the number of minority and non-minority riders for each fixed route in New Bedford and Fall River. For the purpose of this analysis, survey responses were grouped into two categories: Minority and Non-Minority. The Minority category comprised of all respondents that did not identify as White.

In New Bedford, the breakdown between minority and non-minority riders varied greatly. Route 10 and Route 8 had the highest percentage of riders who identified as minority, 65% and 63% respectively. The Intercity route had the highest number of total respondents, with 81 people responding to the survey, of which 51% identified as minority and 49% identified as non-minority.

In Fall River, the breakdown between minority and non-minority was similar. Route 3 and Route 1 had the greatest percentage of riders who identified as minority, 67% and 48% respectively. Route 2 had the highest number of respondents with 33 people responding to the survey, of which 39% identified as minority and 61% identified as non-minority.

Overall, according to the survey, compared to Fall River, New Bedford had a much higher percentage of riders that identified as minority.

New Bedford Route	Number Minority	Percent Minority	Number Non-Minority	Percent Non-Minority
1	30	59%	21	41%
2	32	51%	31	49%
3	8	31%	18	69%
4	13	34%	25	66%
5	8	47%	9	53%
6	5	45%	6	55%
8	15	63%	9	38%
Intercity	41	51%	40	49%
10	22	65%	12	35%
11	10	43%	13	57%
NES	3	25%	9	75%

Fall River Route	Number Minority	Percent Minority	Number Non-Minority	Percent Non-Minority
1	11	48%	12	52%
2	13	39%	20	61%
3	12	67%	6	33%
4	5	29%	12	71%
5	7	41%	10	59%
6	10	31%	22	69%
7	6	33%	12	67%
8	14	47%	16	53%
9	5	29%	12	71%
10	4	25%	12	75%
14	7	41%	10	59%

Low Income Riders

Low Income is defined by 49 U.S.C. 5302 as amended by MAP-21 as “an individual whose family income is at or below 150 percent of the poverty line.” The poverty line varies by household size and is identified by U.S. Department of Health and Human Services.

Survey respondents in both Minority (61%) and Non-Minority (58%) are identified as low-income individuals.

Low Income Riders		
	Minority	Non-Minority
	n=59	n=88
Low Income Riders	61%	58%
Non-Low Income Riders	39%	42%

Travel Patterns

Travel patterns of both Minority and Non-Minority riders showed a similar pattern of ridership regarding trip origin and destination. The most frequent response for trip origin was Home (Minority 53%, Non-Minority 62%), Work (Minority 16%, Non-Minority 9%) was the second most frequent response, followed by School (Minority 6%, Non-Minority 3%). All other trip origins received a lower frequency of response.

Trip Origin		
	Minority	Non-Minority
	n=270	n=327
Home	53%	62%
School	6%	3%
Medical	4%	4%
Shopping	11%	6%
Work	16%	9%
Other	10%	16%

Trip destinations exhibit a varied distribution of response with Home being the most frequent response (Minority 24%, Non-Minority 26%). Work was the next most frequent response

(Minority 26%, Non-Minority 24%), followed by Shopping (Minority 19%, Non-Minority 17%), and Other (Minority 14%, Non-Minority 18%).

Destination		
	Minority	Non-Minority
	n=260	n=303
Home	24%	26%
School	8%	5%
Medical	9%	10%
Shopping	19%	17%
Work	26%	24%
Other	14%	18%

Trip frequencies received comparable frequencies in response among Minority and Non-Minority Riders. Both Minority (61%) and Non-Minority (54%) indicated that they ride daily, with the next highest frequency response of 2-3 times per week (Minority 26%, Non-Minority 36%). The responses suggest that SRTA is the primary mode of transportation among both Minority and Non-Minority riders.

Trip Frequency		
	Minority	Non-Minority
	n=266	n=319
Everyday	61%	54%
Once a Week	7%	5%
2-3/Week	26%	36%
2-3/Month	4%	4%
Less than Once a Month	3%	1%

SRTA offers one free transfer from an inbound bus to second outbound bus, which allows riders to extend the length of their trip without incurring an additional cost. The use of a transfer among Minority (53%) and Non-Minority (53%) riders was the same; slightly more than half of both groups took advantage of the free transfer.

Use of a Transfer		
	Minority	Non-Minority
	n=266	n=319
Yes	53%	53%
No	47%	47%

Fare Usage by Fare Type

The base cash fare for a single trip (including a free transfer) is \$1.50 paid in cash upon boarding; the same trip paid for with a Stored Value Charlie Card costs \$1.40. Fare usage among riders was evaluated by Minority and Low-Income population. Cash fare is the most predominant method of payment among Minorities (45%) and Low-Income (45%) riders. The next most frequent response was for a Full-Fare Pass (Charlie Card) with 23% Minorities and 22% Low-Income riders. All other methods of fare payment received a lower frequency of responses.

When evaluating trip frequency, it was found that both Minority and Non-Minority riders use the SRTA system either daily, or several times per week. Regular riders benefit from the lower per trip cost of a multi-day pass, with the greatest value realized with the Full-Fare Pass (Charlie Card). Low-income riders benefit the most financially when using a multi-day pass due to the lower trip per cost. The low response of a multi-day pass shows the upfront cost presents a financial burden on Low-Income riders. Low-income riders likely choose the base cash fare due to the lower out of pocket expense despite the higher per trip cost.

Fare Usage by Fare Type				
	Minority	Non-Minority	Low-Income	Not Low Income
	n=247	n=326	n=83	n=64
Full Fare-Cash	45%	40%	45%	41%
Full Fare-Pass (Charlie Card)	23%	17%	22%	20%
Full Fare-Stored Value (Charlie Card)	10%	9%	10%	14%
Full Fare - Paper Ticket	<0%	3%	2%	0%
Reduced Fare Pass(Charlie Card)	6%	12%	7%	9%
Reduced Fare - Cash	8%	13%	8%	11%
Reduced Fare - Paper Ticket	<0%	1%	1%	2%
Reduced Fare - Stored Value (Charlie Card)	5%	5%	2%	3%
Other	1%	0%	2%	0%

Conclusion:

The survey results indicate that SRTA riders identify as low-income individuals that ride frequently and pay cash for their trip. Riders that identify as “White” form the majority of riders, and predominantly speak English. The predominant language among Minority riders is English, however Spanish is also prevalent among this population. Riders of both Minority and Non-Minority status use SRTA for a variety of trips that include work, school, shopping, and medical and likely use more than one bus to reach their destination.

The frequency of trips taken by riders suggests a dependency upon SRTA as a mode of transportation; however, the low use of multi-day passes and stored value Charlie Cards raises concerns that the populations that would benefit most from the lower per trip costs are not realizing the benefits either due to a financial barrier or a lack of information about the Charlie Card and multi-day pass programs. Future surveys should explore this area to determine how to expand the use of the Charlie Card and multi-day pass programs.

References:

Federal Transit Laws, Title 49, United States Code, Chapter 53 as amended by MAP-21.

U.S. Census; American Community Survey, 2005-2009 American Community Survey 5 Year Estimates, Table S1903.

U.S. Census; 2010 Census, Table PL94-171.

U.S. Department of Health and Human Services; 2014 Poverty Guidelines; aspe.hhs.gov/2014-poverty-guidelines; (September 17, 2015).

U.S. Department of Transportation – Federal Transit Administration; (2012). *Title VI Requirements and Guidelines for Federal Transit Administration Recipients* (FTA Circular 4702.1B). Washington, DC.

APPENDIX C

SRTA Advisory Board Meeting Minutes



Southeastern Regional Transit Authority Advisory Board Meeting

Date: Thursday, February 21st, 2019

Location: Fall River Government Center
1 Government Center, First Floor Cafeteria
Fall River, MA 02720

(1) Call to Order

The Advisory Board Chair called the meeting to order at 5:03PM EST.

(2) Roll Call

Present:

City of New Bedford

City of Fall River

Absent:

Town of Acushnet

Town of Somerset

Town of Dartmouth

Town of Swansea

Town of Fairhaven

Town of Westport

Town of Freetown

Riders Representative

Town of Mattapoisett

ADA Representative

Additional Attendees:

Erik Rousseau, SRTA

Arthur Frank, General Counsel

Kristen Sniezek, SRTA

Shayne Trimbell, SRTA

(3) Approval of Minutes

The motion was made (Fall River) and seconded (New Bedford) to approve the minutes from the previous November (11/15/2018) Advisory Board Meeting. So Voted.

(4) Citizen's Participation

No Citizen's Participation.

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(5) Service Report

Mr. Erik Rousseau (Administrator) presented the first half (6-month) SRTA Ridership Report for FY19, highlighting the increases in ridership as well as various productivity measures. When compared to the same period of the prior year, the Authority has experienced an overall increase in ridership of 2.24%.

The City of New Bedford questioned the above average decrease shown for the New Bedford Route 4 (NB4) – of which is related to the changes and shifts of nearby Routes. Due to these surrounding movements, the Authority had anticipated a decrease in ridership for the NB4.

(6) Civil Rights Update

The Civil Rights Update has been deferred to the next Advisory Board meeting.

(7) Old Business

Update on Task Force for RTA Performance and Funding:

Mr. Rousseau shared with the Board the recent updates regarding the Regional Transit Authority (RTA) Task Force discussions – most notably of which being the production of a Comprehensive Document that is likely to serve as the basis of the Final Report for the Task Force.

Mr. Rousseau added that the Document appears to fairly represent the interests of the RTA's and would ultimately increase the baseline funding for RTA's from \$82 million to \$90.5 million.

As mentioned in prior Board correspondences, SRTA has submitted three applications for the discretionary funding – NB8 and FR5 night service, Providence service, and continued Wareham service – and is currently awaiting MassDOT conclusion. To date, MassDOT has asked for and received the ridership projections related to the NB8 and FR5 night service.

While no pronouncements have been made, the Authority is prepared for successful notice of the NB8 and FR5 night service.

The City of Fall River questioned if the aforementioned Document (prepared by the Task force) would be subject to public hearing, in which Mr. Rousseau noted said Document should be.

(8) New Business

FY19 Budget Update:

Provided with the meeting materials, Mr. Rousseau presented the high level summary of the FY19 budget progress, underlining the increase in fare revenue – of which can be associated to the increase in ridership.

Additionally, the Board was informed of a forthcoming budget adjustment related to the rise in State Contract Assistance for RTA's from \$80.4 million to \$82 million. This adjustment is set to be presented at the April meeting.

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*FY20 Budget Outlook:*

SRTA will be presenting the draft FY20 Budget on March 21 to the Audit and Finance Sub-Committee, which will then be presented to the Advisory Board. Consistent with prior years, SRTA will be looking to present and subsequently approve the final FY20 Budget at the May Advisory Board Meeting.

In comparison to prior year's spending, the usage of Federal dollars has increased – up to 46% last year – in which Mr. Rousseau stated that under Federal regulation, the maximum allowable split is 50%. Additionally, Mr. Rousseau stressed the importance of matching funds – State Contact Assistance (SCA) and Local Assessment (LA) – on the sustainability of the Authority.

Title VI Plan Presentation:

Shayne Trimbell (Director of Transit Planning) presented the draft version of the SRTA Title VI Plan to the Board. Title VI, by definition, is as followed:

Title VI of the Civil Rights Act of 1964 Provides that no person in the United States shall on the ground of race, color, or national origin be excluded from participation in, denied the benefit of, or be subjected to discrimination under any activity or program receiving federal assistance.

In accordance with the requirements of the Federal Transit Administration (FTA), the Advisory Board is required to acknowledge the report and establish or reaffirm policies and procedures to prevent discriminatory practices.

As outlined in the Report, SRTA is responsible for actively measuring, monitoring, reporting, and assessing the following subset of system-wide service standards related to Title VI: Vehicle Load, Vehicle Headway, On-Time Performance, Service Availability, Distribution of Transit Amenities, and Vehicle Assignment.

The City of New Bedford questioned the information related to Service Availability, of which Mr. Trimbell indicated that this information is reported by the American Community Survey and is based upon access to a vehicle in the household.

The motion was made (Fall River) and seconded (New Bedford) to acknowledge that the Advisory Board has been made aware of SRTA standards in accordance with the Title VI Plan.

(9) Logistics for the Next Advisory Board Meeting

The next SRTA Advisory Board meeting is tentatively scheduled for March 28th in New Bedford, however, Mr. Rousseau shared the intention of polling the Advisory Board Members to gauge if a particular time would be more suitable and help facility attendance. Upon conclusion of the above-mentioned surveying, the time that is determined to be most convenient will be distributed.

The Designee for the City of Fall River mentioned the inability to attend the March meeting.

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(10) Adjournment

The motion was made (New Bedford) and seconded (Fall River) to adjourn the meeting at 5:55PM EST.

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APPENDIX D

Service Change Equity Analysis



Fare Increases and Service Changes

March 13, 2016 – December 31, 2018

2016

- New Bedford Route 9 – Intercity Route

Service increase from sixty-minute headway to thirty-minute headway for weekday service between 9 AM and 6 PM. No changes made to early morning, evening/night service, or Saturday service.

- Fall River Route 6 – Pleasant Street

Service extension from the end of the existing route to Father DeValles Boulevard in Fall River to serve a business park. The extension added service to the destination on all weekday outbound trips. No change was made to the Saturday service.

- No fare increases in 2016

2017

- No major service change were implemented in 2017;
- No fare increases in 2017.

2018

- No major service change were implemented in 2018;
- No fare increases in 2018.

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Southeastern Regional Planning & Economic Development District
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Acushnet
Attleboro
Berkley
Carver
Dartmouth
Dighton
Fairhaven
Fall River
Freetown
Lakeville
Mansfield
Marion
Mattapoisett
Middleborough
New Bedford
N. Attleborough
Norton
Plainville
Raynham
Rehoboth
Rochester
Seekonk
Somerset
Swansea
Taunton
Wareham
Westport

Date: June 20, 2016

To: Erik Rousseau, Administrator - Southeastern Regional Transit Authority

From: Shayne M. Trimbell, AICP - SRPEDD Director of Transit Planning

Re: New Bedford/Fall River Intercity Route Major Service Change Process

During the June 18, 2015 meeting of the Southeastern Regional Transit Authority (SRTA) Advisory Board, action was taken to increase service frequency on the New Bedford/Fall River Intercity Route. The board decision provided an increase in service frequencies from sixty minutes to thirty minutes between the hours of 9:00 AM and 6:00 PM, Monday through Friday. The service began as a pilot service on August 17, 2015 and will continue through June 30, 2016.

In accordance with Section 13.4 – Major Service Change Policy of the Southeastern Regional Transit Authority (SRTA) Title VI Program dated March 16, 2016, the service changes implemented on the New Bedford/Fall River Intercity Route meet the definition of a Major Service Change. At the request of the SRTA administrator, the Southeastern Regional Planning and Economic Development District conducted the elements of the Major Service Change Policy. Major service changes are defined as a 25% or greater change in route miles or revenue miles. The Major Service Change Policy requires that SRTA develop and implement a public participation plan; conduct a separate service equity analysis (included as an attachment); provide a method for the public to provide comments; conduct a public hearing; and advertise the public hearing at least two weeks in advance.

A service change equity analysis was completed and dated May 11, 2016. The public participation plan for the service change included a public hearing and the availability for the public to submit comments via email, telephone, or surface mail. A public hearing was scheduled and held on June 7, 2016 at 9:30 AM the New Bedford Public Library. The public hearing was held in conjunction with the quarterly SRTA Consumer Advisory Committee meeting so to increase attendance and broaden the base of likely participants. Advertisements for the public hearing (included as an attachment) were posted at the New Bedford Terminal and the Fall River Louis D. Pettine Transportation Center as well as on all fixed route buses; advertisements were posted on May 25, 2016.

The public hearing was opened at 9:00 AM on Tuesday, June 7, 2016 by Shayne M. Trimbell, AICP, Director of Transit Planning for the Southeastern Regional Planning and Economic Development District on behalf of SRTA. Mr. Trimbell explained the purpose of the public hearing, and described the findings of the Service Change Equity Analysis. Upon completing his description of the equity analysis, Mr. Trimbell asked that if anyone would like to enter comments for the record, to state their name and the town or city in which they reside.

Ms. Tracy Tarvers of New Bedford, MA stated that she is satisfied with the #9 Route, but would like another hour be added to the run. Ms. Travers explained that it is difficult to catch the 6:00PM bus to Fall River if the #9 is running late.

Ms. Sabrina Davis of Fall River, MA stated that she would like to see the route service hours be extended later during the holiday season or Saturday service during the holiday season.

Ms. Sigute Meilus of New Bedford, MA stated that she would like thirty-minute service extended to Saturday and route service to begin earlier in the mornings.

The public hearing was closed at 9:39AM by Mr. Trimbell upon the conclusion of all public comments.

SRTA did not receive any written comments submitted either by e-mail or surface mail.

It is the opinion of SRPEDD that the Major Service Policy requirements have been fulfilled and action taken by SRTA Advisory Board to make permanent the above mentioned service changes to the New Bedford/Fall River Intercity Route will be in compliance with Section 13.4 Major Service Change Policy of the SRTA Title VI Program dated March 16, 2016.

Attachments:

- June 7, 2016 Public Hearing Advertisement
- June 7, 2016 Public Hearing Sign-in sheet
- New Bedford/Fall River Intercity Route Equity Analysis dated May 11, 2016



SRTA FIXED ROUTE CONSUMER ADVISORY MEETING

WHEN: Tuesday, June 7, 2016 at 9:30AM

WHERE: New Bedford Free Public Library, 3rd Floor Meeting Room,
613 Pleasant Street, New Bedford, MA 02740

WHY: Tell us about your experience with SRTA! Come speak about your
issues with SRTA Fixed-route!

Public Hearing for SRTA Intercity Route Service Increase will be held
during the Consumer Advisory Meeting. Comments on the increased
service on the Intercity Route will be accepted at the meeting.

For more information:

Southeastern Regional Transit Authority
700 Pleasant Street, Suite 320
New Bedford, MA 02740
508-999-5211
info@srtabus.com



Southeastern Regional Planning & Economic Development District
88 Broadway Taunton, MA 02780-2557

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Norton
Plainville
Raynham
Rehoboth
Rochester
Seekonk
Somerset
Swansea
Taunton
Wareham
Westport

Date: May 11, 2016

To: Erik Rousseau - SRTA Administrator

From: Shayne M. Trimbell, AICP - SRPEDD Director of Transit Planning

Re: Equity Analysis for New Bedford to Fall River Intercity Route Service Change

In accordance with Section 13.4 of the Southeastern Regional Transit Authority (SRTA) Title VI Program dated March 16, 2016, a service equity analysis shall be conducted for all major service changes. Major service changes are defined as a 25% or greater change in route miles or revenue miles. The service change equity analysis evaluates the potential for a disparate impact on minority populations and a disproportionate burden on low income populations. The proposed changes to New Bedford Routes 9 – Intercity Route (NB9) exceed 25% of the total route revenue mileage and warrant a service change equity analysis.

For the purpose of this analysis, data from the 2010 Census and the 2005-2009 American Community Survey was used to determine the minority and low income populations for the census tracts affected by the changes. The affected populations were compared against the total populations for the SRTA region to determine if the changes will result in a disparate impact on the minority population and a disproportionate burden on the low income population. Section 13.5 Disparate Impact Policy of the Title VI Program defines “a threshold of 20% which means that a disparate impact occurs when the fare or service change affects a minority population 20% more than a non-minority”. Section 13.6 Disproportionate Burden Policy of the Title VI Program defines “a threshold of 20% which means that a disproportionate burden occurs when fare or service changes affects low-income population 20% more than non-low income”.

Proposed Changes

The SRTA Advisory Board took action at the April 27, 2016 to make permanent an increase in service that began as a trial period on August 17, 2015. The temporary service change increased weekday service between the hours of 9 AM and 6 PM from sixty minute frequency to thirty minute frequency. Prior to the change, the NB9 operated 508.5 revenue miles per weekday; after the change, the NB9 operates 813.6 revenue miles per weekday, a 58% increase in revenue miles. The change affects fifteen census tracts: 6408, 6411.01, 6412, 6413, 6414, 6415, 6461.01, 6510.01, 6510.02, 6516, 6517, 6531.01, 6531.02, 6532.04, and 9855. Figure 1: Intercity Route with Census Tracts shows all census tracts served by the NB9. Table 1: Intercity Route Demographics shows the populations by Census Tract.

Determination of Disparate Impact and Disproportionate Burden

Tracts 6516 and 6517 in New Bedford exceed the 20% threshold for affected minority populations; Tracts 6412 and 6413 in Fall River and Tract 6518 in New Bedford exceed the 20% threshold for affected low-income populations. The analysis indicates that there is a disparate impact for the minority population living in Tracts 6516 and 6517 in New Bedford. The impact is mitigated by the fact that the service change increased service frequencies to these Census Tracts resulting in a positive impact to the minority population. The analysis indicates that there is a disproportionate burden for the low-income population living in Tracts 6412 and 6413 in Fall River and Tract 6518 in New Bedford. The burden is mitigated by the fact that the service change increased service frequencies to these tracts resulting in a positive impact to the low-income population.

Equity Analysis for New Bedford to Fall River Intercity Route Service Change

May 11, 2016

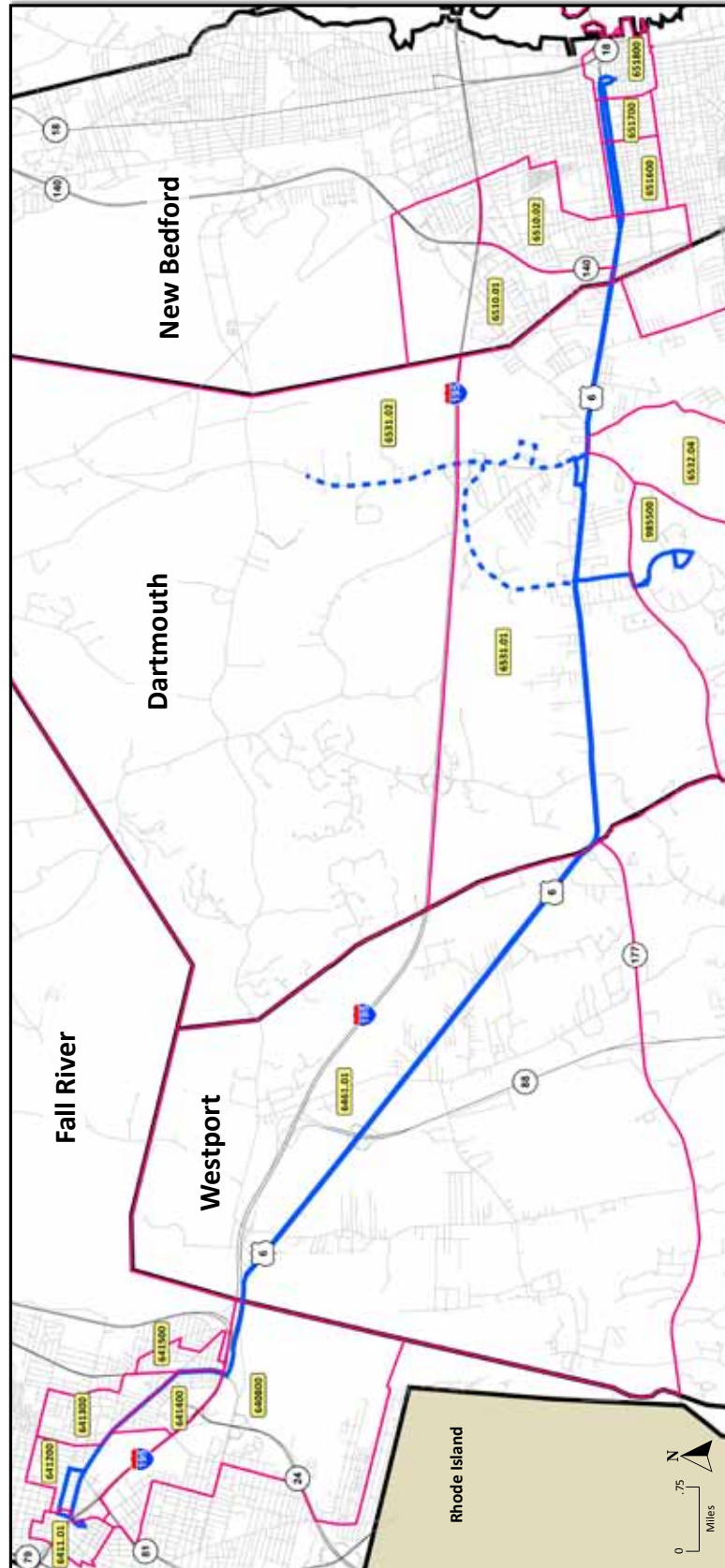
Tract (2010 Census)	Population (2010 Census)	Minority (2010 Census)	Percent Minority	Tract (2005- 2009 ACS)	Population (2005-2009 ACS)	Below Poverty Level (2005- 2009 ACS)	Percent Low Income
6408	3,813	744	20%	6408	3,772	822	22%
6411.01	1,712	416	24%	6409	6,627	1,661	25%
6412	2,803	516	18%	6411	461	133	29%
6413	5,326	1,249	23%	6412	3,098	1,451	47%
6414	2,586	527	20%	6413	5,589	1,978	35%
6415	2,401	208	9%	6414	2,896	731	25%
6461.01	7,356	189	3%	6415	2,316	414	18%
6510.01	2,865	482	17%	6461.01	7,380	207	3%
6510.02	3,833	979	26%	6510.01	3,094	727	23%
6516	3,862	1,369	35%	6510.02	3,701	696	19%
6517	1,983	937	47%	6516	4,053	904	22%
6518	1,745	566	32%	6517	2,136	557	26%
6531.01	6,664	533	8%	6518	1,489	752	51%
6531.02	5,381	576	11%	6531.01	6,857	310	5%
6532.04	3,214	261	8%	6531.02	5,167	108	2%
9855	5,506	672	12%	6532.01	8,929	581	7%
				6532.02	4,052	113	3%
SRTA Total	308,614	41,305	13%		308,019	42,660	14%

Table 1: Intercity Route Demographics

Data Source: 2010 Census, 2005-2009 American Community Survey



Intercity Route with Census 2010 Tracts





Southeastern Regional Planning & Economic Development District
88 Broadway ♦ Taunton, MA 02780-2557

Acushnet
Attleboro
Berkley
Carver
Dartmouth
Dighton
Fairhaven
Fall River
Freetown
Lakeville
Mansfield
Marion
Mattapoisett
Middleborough
New Bedford
N. Attleborough
Norton
Plainville
Raynham
Rehoboth
Rochester
Seekonk
Somerset
Swansea
Taunton
Wareham
Westport

Date: March 28, 2016

To: Erik Rousseau – SRTA Administrator

From: Shayne M. Trimbell, AICP – SRPEDD Director of Transit Planning

Re: Service Change Equity Analysis for Fall River Routes 6 & 10

At the request of the Administrator for the Southeastern Regional Transit Authority (SRTA), the Southeastern Regional Planning and Economic Development District (SRPEDD) has evaluated Fall River Routes 6 – Pleasant Street and Fall River Route 10 – Rodman Street proposed service changes in accordance with Section 13.4 – Major Service Change Policy of the SRTA Title VI Program dated March 16, 2016. Section 13.4 defines a Major Service Change as a 25% or greater change in route miles or revenue vehicle miles for any one route. Proposed routing changes for both Fall River Route 6 – Pleasant Street and Fall River Route 10 – Rodman Street to serve Father Devalles Boulevard in Fall River, MA exceed 25% of the total route mileage.

Proposed changes

Fall River Route 6 – Pleasant Street

Upon reaching the current terminus of the route at 638 Quequechan Street (Wal-Mart), the route will continue south on Quequechan Street which becomes Jefferson Street to the intersection of Jefferson Street and turn east on to Brayton Avenue. The route will travel east on Brayton Avenue to Father Devalles Boulevard and turn west onto Father Devalles Boulevard. The route will travel west on Father Devalles Boulevard to its end point which will become the new terminus of the route. The route will reverse to return to 638 Quequechan Street (Wal-Mart).

The total one way mileage for the route extension is 1.6 miles. The current route miles is 4.96 miles. The route extension will increase the one-way route mileage by 32% which exceeds the 25% threshold for a Major Service Change.

Fall River Route 10 – Rodman Street

Upon reaching the intersection of Brayton Avenue the route will turn east on to Brayton Avenue. The route will travel east on Brayton Avenue to Father Devalles Boulevard and turn west onto Father Devalles Boulevard. The route will travel west on Father Devalles Boulevard to its end point and reverse direction to return to Jefferson Street at which point the route will return to the current alignment.

The total one way mileage for the route extension is 2.57 miles. The current route mileage is 5.91 miles. The route extension will increase the one-way route mileage by 43% which exceeds the 25% threshold for a Major Service Change.

Equity Analysis

For the purpose of this analysis, data from the 2010 Census and the 2005-2009 American Community Survey was used to determine the minority and low income populations for the census tracts affected by the service changes. The affected populations were compared against the total populations for the SRTA region to determine if the changes will result in a disparate impact on minority populations or a disproportionate burden on low-income populations. Section 13.5 Disparate Impact Policy of the SRTA Title VI Program dated March 16, 2016 defines a “threshold of 20%, which means that a disparate impact occurs when the fare or service change affects a minority population 20% more than a non-minority population.” Section 13.6 Disproportionate Burden of the Title VI Program dated March 16, 2016 defines a “threshold of 20%, which means that a disproportionate burden occurs when the fare or service change affects a low-income population 20% more than a non-low-income population.”

The proposed service changes for both routes will affect Census Tract 6408. Based on the thresholds established by the Title VI Program dated March 16, 2016 Census Tracts 6412 and 6413 served by Fall River Route 6 – Pleasant Street and Census Tract 6412 served by Fall River Route 10 – Rodman Street exceed the 20% threshold for low-income populations however the proposed service changes will not affect these tracts. Census Tract 6408 does not meet the 20% threshold for either the Disparate Impact Policy or Disproportionate Burden Policy. Table 1 below shows the population demographics for Fall River Route 6 – Pleasant Street; Table 2 below shows the population demographics for Fall River Route 10 – Rodman Street; and Table 3 below shows the population demographics for the SRTA service area.

Table 1: Fall River Route 6 - Pleasant Street

2010 Census				2005 - 2009 ACS			
Tract	Total population	Minority Population	% Minority Population	Tract	Total Population	Low-Income Population	% Low-Income
6408	3,813	744	19.51%	6408	3772	822	21.79%
6410	2,419	350	14.47%	6409	6627	1661	25.06%
6411.01	1,712	416	24.30%	6410	2402	536	22.31%
6412	2,803	516	18.41%	6411	641	133	20.75%
6413	5,326	1,249	23.45%	6412	3098	1451	46.84%
6414	2,586	527	20.38%	6413	5589	1978	35.39%
6420	3,274	582	17.78%	6414	2869	731	25.48%
				6420	2743	814	29.68%
Total	21,933	4,384	19.99%		27,741	8,126	29.29%

Table 2: Fall River Route 10 - Rodman Street

2010 Census				2005 - 2009 ACS			
Tract	Population (2010 Census)	Minority (2010 Census)	% Minority	Tract	Total Population	Low-Income Population	% Low-Income
6406	4,450	640	14.38%	6406	4692	793	16.90%
6407	2,900	234	8.07%	6407	2908	310	10.66%
6408	3,813	744	19.51%	6408	3772	822	21.79%
6411.01	1,712	416	24.30%	6409	6627	1661	25.06%
6412	2803	516	18.41%	6411	461	133	28.85%
				6412	3098	1451	46.84%
Total	15,678	2,550	16.26%	38,453	21,558	5,170	23.98%

Table 3: SRTA Systemwide Total

2010 Census			2005-2009 ACS		
Total Population	Minority	% Minority	Total Population	Low-Income Population	% Low-Income
308,614	41,305	13.38%	308,019	42,660	13.85%

Determination of Disparate Impact and Disproportionate Burden

Based on this analysis, it has been determined that the proposed route changes will not cause a disparate impact on minority populations or cause a disproportionate burden on low income populations. The proposed service changes do not affect service outside of the Census Tracts currently served by Fall River Route 6 – Pleasant Street and Fall River Route 10 – Rodman Street. The proposed service changes extends the length of the route and travel time for the route however it is the intent of SRTA to maintain existing headways on either route.

Only one of the proposed service changes will be implemented by SRTA with a determination on the most effective change to be made based on available operating time, estimated operating cost, and input received from the riding public. The cause for consideration of this service change is to serve a site that houses the Massachusetts Department of Developmental Services which serves disabled, low-income, and minority populations. The site is currently not served by any SRTA fixed route transit service.