



Title VI Plan

January 2023 – December 2026

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Valley Transit Title VI Policy Statement and Mission

Valley Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or be subject to discrimination in receipt of its services or programs on the basis of race, color, national origin, or any other characteristic protected by law, including Title VI of the Civil Rights Act of 1964, as amended. Further, under the Americans with Disabilities Act (ADA) of 1990, no entity shall discriminate against an individual with a physical or mental disability in connection with the provision of transportation services.

Valley Transit's primary goal is to ensure all management, staff, contractors, local agencies, and service beneficiaries are aware of the provisions of, and responsibilities derived from Title VI of the Civil Rights Act of 1964 and the Federal Transit Administration (FTA) Circular 4702.1B of 2012.

Valley Transit's Title VI policy is responsible for providing leadership, direction, and policy to ensure compliance with Title VI, Environmental Justice, and Limited English Proficiency principles. This policy also ensures that social impacts to communities and people are recognized and considered throughout the transportation planning, and decision-making process.

To obtain more information on Valley Transit's nondiscrimination obligations or to file a Title VI complaint, contact Valley Transit's Title VI Coordinator at:

Title VI Coordinator
1401 West Rose Street
Walla Walla, WA 99362

Email address: info@valleytransit.com
By phone: 509-525-9140
By Fax: 509-525-9142

You may file a written complaint no later than 180 days after the date of the alleged discrimination.

Information on non-English alternative formats may be obtained from the Administrative Department at 509-525-9140.

La información sobre formatos alternativos que no están en inglés se puede obtener del Departamento Administrativo al 509-525-9140



Angelic Peters
General Manager

Angelic Peters, General Manager
Phone: 509-525-9140 – Fax: 509-525-9142
1401 West Rose Street
Walla Walla, WA 99362
www.valleytransit.com

What is Title VI?

Title VI of the Civil Rights Act of 1964 is the main legal authority for the Office of Equal Opportunity, External Civil Rights nondiscrimination programs. Title VI prohibits discrimination on the basis of race, color, or national origin in programs or activities receiving federal financial assistance. Once an agency accepts federal funds, all of its programs and activities are covered, regardless of their funding source. Related statutes and Presidential Executive Orders under the umbrella of Title VI address Environmental Justice (EJ) in minority and low-income populations, and services to those individuals with Limited English Proficiency (LEP), women and those with disabilities.

What does that mean to passengers?

Valley Transit cannot, on the basis of race, color, national origin or sex, either directly or through contractual means:

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

This plan documents Valley Transit's efforts to comply with these requirements.

Notification of Beneficiaries of Title VI Rights

1. Valley Transit hereby gives public notice that it is the Organization's policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities. Title VI requires that no person shall, on the grounds of race, color, sex, or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any Federal Transit Administration program or other activity for which Valley Transit received Federal financial assistance.
Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with Valley Transit. Any such complaint must be in writing and filed with the Valley Transit Title VI Coordinator within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained from the Valley Transit office (at no cost to the complainant), on the website at www.valleytransit.com, by calling 509-525-9140 or by faxing 509-525-9142.
2. Valley Transit's website includes the Title VI policy and complaint form. These can also be found at our Main Office (located at 1401 West Rose Street, Walla Walla, WA) as well as the Market Station Transfer Center (located at 109 West Main Street, Walla Walla, WA). Individuals who believe they have been discriminated against may request a complaint form from the Customer Service representatives at the Main Office or print them from the website.
3. If information is needed in another language, please contact the Title VI Coordinator at 509-525-9140

Title VI Complaint Procedure

Any person who believes they have been discriminated against on the basis of race, color, or national origin by Valley Transit may file a Title VI complaint by completing and submitting a *signed* Title VI Complaint Form which can be accessed at www.valleytransit.com or by requesting a copy from Valley Transit staff at 1401 West Rose Street, Walla Walla, WA 99362 or calling 509-525-9140. The complaint should include the following information:

- Your name, mailing address, and how to contact you (i.e. telephone number, email address, etc.)
- How, when, where, and why you believe you were discriminated against. Including the location, names of and contact information for any witnesses.
- Other information that you feel is significant.

The complaint may be filed in writing at the following address:

Valley Transit

Title VI Coordinator

1401 West Rose Street

Walla Walla, WA 99362

By Phone: (509) 525-9140

By Fax: (509) 525-9142 *(an original, signed copy must be mailed to the Title VI Coordinator as soon as possible, but no later than 180 days from the alleged date of discrimination if you submit through this format)*

Note: Valley Transit encourages all complainants to certify all mail that is sent through the U.S. Postal Service, and/or ensure that all written correspondence can be easily tracked.

Valley Transit's process for addressing a Civil Rights Complaint is as follows:

- Once the complaint is received Valley Transit staff will review it to determine the jurisdiction of the complaint. The complaint will be logged and the complainant will receive an acknowledgment letter, email, or fax (in a fashion appropriate to the manner in which the complaint was received) within 14 days informing them whether the complaint will be investigated by our office.
 - In instances where additional information is needed for investigation of the complaint, Valley Transit will contact the complainant in writing. Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.
- Any complaint that deals with Federal Civil Rights Issues will be reviewed by the Title VI Coordinator and forwarded to the General Manager.
- Once the complaint has been logged, Valley Transit has 60 days to resolve the issue, not including the appeals process
 - Once sufficient information for investigating the complaint is received by Valley Transit, a written response will be drafted, subject to review by the transit's attorney. If appropriate, Valley Transit's attorney may administratively close the complaint. In this case, Valley Transit will notify the complainant of the action as soon as possible. If a complainant does not provide a way to contact them, no external response will be issued.

- It is *anticipated* that *most* Title VI Complaint Investigations will follow this timeline:
 - Within 7 calendar days from the log date, Valley Transit will investigate the full complaint, including but not limited to: clarifying questions with the complainant, interviewing staff alleged to be involved, inquiring with witnesses to alleged event(s), consulting with local and state civil rights experts, and following up with the complainant.
 - Within 10 calendar days from the log date the Title VI Coordinator will provide the respondent(s) and General Manager with a written account of the investigation(s) and finding(s). The respondent(s) will have 10 calendar days from the date of notification to accept the account of events or furnish their written response to the allegation(s).
 - Within 30 days from the log date, Valley Transit will take corrective action(s) deemed to be necessary and appropriate.
 - Within 60 days from the log date, Valley Transit's final investigative report and a copy of the complaint will be forwarded to the complainant(s), respondent(s), WSDOT Public Transit Division, and the Federal Transit Administration's Office of Civil Rights.

The final notification to the complainant will include their right to 1) appeal to Valley Transit's General Manager within 7 calendar days of the receipt of the final written decision, and/or 2) file a complaint externally with the Federal Transit Administration.

Federal Transit Administration
Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC, 20590

Record of Title VI or other Civil Rights Investigations, Complaints, or Lawsuits

Valley Transit maintains an active log for all Civil Rights Complaints with internal software, and a copy of the current log is available upon request by submitting a public records request via letter or email to the Public Records Officer. To date, there have been no Title VI complaints, investigations, or lawsuits at Valley Transit.

Public Participation Plan and Summary of Efforts

Purpose

The purpose of this Public Participation Plan (PPP) is to establish procedures that encourage the full participation of all citizens in the Valley Transit service area, including but not limited to, low-income and minority individuals, and those with limited English proficiency. While traditional means of soliciting public involvement may not reach such individuals, or might not allow for meaningful avenues of input, the intent of this effort is to take reasonable actions throughout the planning process to provide opportunities for historically under-served populations to participate. Additionally, as members of the Walla Walla Valley Metropolitan Planning Organization (WWVMO), Valley Transit closely partners with them on their established Transportation Improvement Plan (TIP), and Public Participation Plan (PPP) which satisfies our requirements for a Program of Projects under the 5307 program as part of serving the same community.

This document will lay out procedures to provide opportunities for all area citizens to participate in the development of short- and long-term plans for Valley Transit. Where appropriate, Valley Transit will make improvements to its public participation plan.

A notice will be posted in English and Spanish local newspapers and on the Valley Transit website noting the existence of this PPP and a copy will be sent, at a minimum, to stakeholders identified in this document. This posting will be made whenever changes are made to the PPP, a review of the PPP is done in tandem with the Title VI policy review once every three years.

Goals and Objectives

The goal of the PPP is to offer opportunities for the engagement of all citizens of Valley Transit’s Service Area to participate in the development of short- and long-term plans.

In support of this goal, our objectives are:

- To determine what non-English languages, and other cultural barriers exist to public participation within Valley Transit’s Service Area;
- To provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to all populations in the area;
- To hold meetings in locations which are accessible and reasonably welcoming to all area residents, including, but not limited to, low-income and minority members of the public;
- To provide avenues for a two-way flow of information and input from populations that are not likely to attend meetings;
- To provide a framework of actions to encourage public participation in the development of various types of plans and programs, as well as amendments or alterations to any such plan or program;
- And to use various illustrative, visualization techniques to convey the information including, but not limited to, charts, graphs, photos, maps, and the internet.

Identification of Stakeholders

Valley Transit stakeholders are those who are either directly or indirectly affected by a plan, or the recommendations of that plan. Those who may be adversely affected, or who may be denied the benefits of a plan’s recommendation(s) are of particular interest in the identification of specific stakeholders. Stakeholders are broken down into several groups: general citizens, minority and low-income persons, public agencies, and private organizations and businesses.

Valley Transit Service Area

Category	Number	Population Percentage
Total	43,296	100%
White alone	29,784	68.8%
Hispanic/Latino	9,683	22.4%
Black	910	2.1%
American Indian/Alaskan	719	1.6%
Asian	923	2.1%
Hawaiian/Pacific Islander	120	0.28%
Two or More	3,322	7.7%

*Data Collected from Census Bureau Population Estimates, July 1, 2022, (V2022). It should be noted that the full demographic breakout accounts for more than 100% due to the inclusion of the “two or more” category.

General Citizens

According to the 2022 Census Bureau data, there are 43,296 citizens in the Valley Transit Public Transportation Benefit Area. 2021 Census Bureau data from the American Community Survey indicates that of persons over the age of five, 28.7% of the population speaks a language other than English at home. Of those statistics, 24.3% of the population over the age of five speaks Spanish. Most other languages account for 1% or less of the remainder. Because of this, Valley Transit maintains that providing materials in Spanish will remain a priority.

Some of the techniques that can be used to engage the general population are public notices of meetings in the local newspaper, via social media channels, and on the radio. These meetings can be held as open house format public information meetings in locations such as the public library or even at Valley Transit’s Administrative Building. Staff will also continue to utilize on-board surveys, focus groups, and use of local media and the internet to encourage participation from the public.

Minorities

Minority populations make up 31.2% of the population in Valley Transit’s Service Area. Hispanics make up the largest minority, with an average of 22.4% of the population. Black and Asian populations make up 2.1% each. American Indians/Alaskans account for 1.6% of the population, and Pacific Islanders represent less than 1%.

Engaging minority and low-English proficiency populations can be a challenge. Language and cultural differences may not be compatible with the more traditional means of engaging the public in the planning process. Valley Transit has made reasonable efforts to engage minority populations using non-English mediums such as Spanish language radio and newspapers. Participation in the regional Metropolitan Planning Organization, the Human Services Transportation Plan Oversight Committee, and meetings with representatives from local human services organizations allows us to garner input from specific segments of the population. Valley Transit provides in-house translation services, utilizes the services of a telephone language line, and offers Travel Training services with Spanish-speaking employees. Valley Transit offers assistance in the event an individual would need alternative language interpretation, including Sign Language.

Low-Income

The 2022 Census Bureau data listed the per capita income for Walla Walla County as \$31,615, the median household income as \$63,686, and the percentage of persons in poverty as 12.1% This data set uses the Federal Poverty Level varied by family size.

The 2022 Census Bureau data listed the per capita income for College Place as \$28,933, the median household income as \$56,442, and the percentage of persons in poverty as 10.3%

The 2022 Census Bureau data listed the per capita income for Walla Walla (city) as \$28,212, the median income as \$55,648, and the percentage of persons in poverty as 13.5%.

While low-income individuals may have access to all of the traditional means of public involvement discussed earlier in the section on “general citizens,” they may be less likely to become involved or

offer input. Some methods of gathering input either directly or indirectly from this population includes on-board surveys and the involvement of agencies such as the local employment offices, housing groups, and public assistance providers that work with low-income individuals and families.

Public Agencies

Public agencies can provide valuable input in the planning process. Pertinent public agencies include those that have clients who fall into under-represented populations, including but not limited to minorities, low-income, and limited English proficiency households. All of these agencies have insight into the transportation needs of their clients, and are useful partners in overcoming barriers that may not be understood by professionals dealing more directly with the provision of services.

Private Organizations and Businesses

Private organizations and businesses offer a number of perspectives that are valuable to our planning processes. Valley Transit has extensive contact with service providers who work closely with the developmentally disabled and elderly populations who often cross over into the low-income, minority, and limited English proficiency demographic(s).

Outreach Efforts

Valley Transit has board-approved public participation/public notification policies (see Appendix B). In addition to the processes set out in this policy, staff may use the following techniques during its planning studies as deemed appropriate by staff:

- Presentations to professional, citizen, and other organizations
- Articles in community newspapers
- Interviews with local radio stations (both English and Spanish speaking)
- Press releases and meetings with local media representatives
- Informational conversations with individuals and small groups
- Interviews with individuals who are or may be affected by proposed plans
- User and non-user surveys
- Use of illustrative visualization techniques to convey the information including, but not limited to, charts, graphs, photos, maps, and the internet

During any planning process, the public is invited to contact Valley Transit with comments and/or to request additional information. Requests can be made via telephone by contacting Valley Transit Customer Service at 509-525-9140, through the contact form at www.valleytransit.com, or through email to info@valleytransit.com. Comments will be collected, documented, and presented to the Valley Transit Board of Directors. Valley Transit does not record social media interactions as part of the formal public comment process, but does maintain an archive of all interactions on their social media channels.

Summary of Public Participation Efforts

Service recipients have wide latitude to determine what specific measures are most appropriate and should make this determination based on the composition of the affected population, the public involvement process, and the resources of Valley Transit. Valley Transit has engaged the public in its planning and decision-making processes, and the public was invited to participate through marketing and outreach activities as well.

Transit Development Plan (TDP)

The Transit Development Plan is a requirement of the Washington State Legislature (RCW 35.58.2795). The TDP is prepared by the independent transit properties and submitted to WSDOT. A summary document is prepared that shows the size of the fleet, revenue, service revenue hours, revenue miles, operating expenses, and capital expenditures. The document projects future service levels and capital improvements. Public hearings are held at Valley Transit to obtain comments from the public on the TDP.

Transportation Improvement Plan (TIP)

The Transportation Improvement Program is prepared and used as a planning document to identify agency requirements for capital replacement and improvement projects. Public hearings are held by the WWVMPO to obtain comments from the public on Valley Transit's TIP. All TIPs from local jurisdictions (counties and cities) as well as all transit TIPs are merged to create the Statewide Transportation Improvement Program (STIP) which is required by the federal government. If an item Valley Transit wishes to purchase is not in the STIP, it cannot be funded with federal funds. Although the STIP is a federal requirement, it goes through a Regional and Statewide planning process.

Board Meetings

The Valley Transit Board of Directors holds monthly meetings and the public is invited to attend, with a standing agenda item inviting public comment. The agenda for each meeting is sent each month to La Voz, the local Spanish newspaper, to ensure meeting information is available in a non-English format.

Public Meetings

When new service is proposed, significant route changes are made, or plans other than the TDP or TIP are updated information is disseminated to the neighborhoods affected and public meetings are scheduled. Rider alerts are placed on buses, shelters, and route signs to advertise for public meetings with impacted populations.

Major Service Changes

When potential service changes are considered, Valley Transit engages the public, through meetings, to invite comment and questions. A notice is posted requesting that attendees in need of language assistance call the main office to make the request. Rider alerts are placed on buses, shelters, and route signs to advertise for these meetings with impacted populations.

Fare Changes

If Valley Transit must consider a fare change, the public is invited to participate and comment on any potential change to the fare at public meetings that are scheduled to solicit their input. Rider alerts are placed on buses, shelters, and route signs to advertise these meetings with impacted populations.

Travel Training Classes

Valley Transit has developed a travel training program to reach out to community groups (i.e., senior centers, senior facilities, and those people who have disabilities, etc.) to conduct travel training classes. Travel training classes are ongoing as well as outreach to these populations, and any others that are identified as having a need.

Customer Comment Process

Those residing in the Valley Transit PTBA may call our Main Office at 509-525-9140 to lodge a complaint, compliment, or comment. All complaints, compliments, and comments are entered into a database and distributed to the relevant department manager. The manager researches the complaint and if appropriate responds back to the citizen (if valid contact information is given). This database allows complaints to be sorted by type, and maintains a separate log for Title VI and ADA complaints.

Valley Transit tracks complaint type, the date of the complaint, the investigation, any legal action taken, a summary of the allegation(s), the status of the complaint, and a summary of any actions taken in response to the complaint.

All information is tracked until the complaint, investigation, and/or legal action has been closed. The records are then stored according to state and federal records retention requirements. Tracked information (such as Title VI or ADA) will be reported to the FTA and/or WSDOT as the grantors of public funds.

General Awareness and Phone Survey

Valley Transit periodically conducts onboard rider and general awareness surveys. Origin/Destination surveys and other public surveys are developed to assist Valley Transit in gathering information about service alternatives and possible route changes.

Bilingual Outreach

Valley Transit's Customer Service representatives provide Spanish-speaking guests with information on public transit services in Spanish. Valley Transit offers Spanish training to all staff to facilitate the ability to deliver this service. Interpreter services are utilized in outreach programs and offered for programs and public meetings. Valley Transit refers to phone language services in the event that a guest is in need of interpretation for a language not spoken by staff.

Limited English Proficiency Outreach Plan

Valley Transit is committed to breaking down language barriers by implementing consistent standards of language assistance across its service area.

Census

The United States is home to millions of national origin minority individuals who are limited English proficient (LEP). That is, their primary language is not English and they cannot speak, read, write, or understand the English language at a level that permits them to interact effectively with recipients of Federal financial assistance. Because of language differences and the inability to effectively speak or understand English, persons with LEP may be subject to exclusion from programs or activities, or experience delays or denials of services. These Individuals may be entitled to language assistance with respect to a particular type of service. The Federal Government and those receiving assistance from the Federal Government must take reasonable steps to ensure that LEP persons have meaningful access to the programs, services, and information those entities provide. This will require agencies to establish creative solutions to address the needs of this ever-growing population of individuals for whom English is not their primary language. To determine the need to provide language assistance for

non-English speaking individuals, information was gathered from ridership surveys, social service agencies, and local school districts.

Analysis of Factors

Factor #1: The number or proportion of LEP persons in the Service Area.

Valley Transit's jurisdiction (or PTBA) covers the cities of Walla Walla and College Place and parts of Walla Walla County. Valley Transit has an established practice of extending Dial-a-Ride services into new areas annexed by either city, and evaluating the efficacy of expanding Fixed Route service on regularly scheduled service audits. The vast majority of the population with which Valley Transit does business (individuals wishing to ride transit) is proficient in English, so intensive LEP services are not required on a regular basis. According to the latest ACS 5-Year Estimates, a language other than English is spoken by 20.3% of the residents in Walla Walla and 14% in College Place. Overwhelmingly, Spanish spoken in the household represents 8.7% of the non-English speaking population within Walla Walla and 11.4% in College Place.

Factor #2: The frequency with which LEP individuals come into contact with the service.

Valley Transit serves LEP persons daily via our buses, Paratransit, Demand Response services, and Rideshare program. Customer Service representatives have received Spanish language training, and many of the operators have been certified as proficient in conversational Spanish. Valley Transit also provides "Language Line" services and uses Google Translate, or other translation apps, to communicate as needed. Language assistance and document translation services are also available upon request.

Factor #3: The nature and importance of services provided by Valley Transit

Valley Transit provides important public transportation services to the residents of the PTBA through its Fixed Route, Paratransit, Demand Response, and Rideshare programs.

Factor #4: The resources available to the recipient of federal funds to assure meaningful access to the services for LEP persons

Valley Transit's current in-house language capabilities are English and Spanish only. Staff currently has job-related conversational language proficiency certified/re-certified on a bi-annual basis. Staff is incentivized monetarily to receive this training, and upon certification begin delivering service to LEP persons on any occasion they have contact with the transit system.

Additionally, Valley Transit has an outreach program where Spanish-speaking passengers are taught how to ride the bus through training and one-on-one assistance with a staff person who can speak their language. Finally, Valley Transit has publications in both English and Spanish, with the route guide displaying information in both languages on the same document. Special notices of public meetings and accommodations are always made available in Spanish. Over each biennium Valley Transit invests roughly \$11,200 in providing documents and advertisements in both English and Spanish.

Implementation Plan

Valley Transit has already implemented its plan and will review it on a triennial basis unless a Title VI complaint necessitates reviewing it sooner. Valley Transit will continue to identify LEP persons in the service area by ridership, telephone contact counts, neighborhood demographics, general awareness

surveys, and board surveys. Per CFR 21.9(d) Valley Transit maintains postings of statements of rights, and a policy statement, for Title VI beneficiaries. A copy of these can be found in Appendix H.

Construction Project Equity Analysis

Over the last three years Valley Transit has not completed a construction project requiring an environmental assessment (EA) or environmental impact statement (EIS), but is aware of the Title VI requirements to conduct equity analyses for all facility construction projects, during the planning state. Valley Transit will follow all requirements under the National Environmental Policy Act and other overarching planning processes to guide equitable consideration of facility sites and their impacts. A facility that results in Disparate Treatment may have substantial legitimate justification and lack of other alternatives. If so, both must be demonstrated in the planning process.

Appendix A: Title VI Complaint Form

VALLEY TRANSIT TITLE VI COMPLAINT FORM

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

Valley Transit
Title VI Coordinator
1401 W. Rose Street
Walla Walla, WA 99362
509-525-9140
509-525-9142 (fax)

PLEASE PRINT CLEARLY:

Name: _____

Address: _____

City, State, Zip Code: _____

Phone Number: _____ Home: _____ Cell: _____

Person discriminated against (*if different*): _____

Address of person discriminated against: _____

City, State, Zip Code: _____

Please indicate below the discrimination you believe occurred (check all that apply):

_____ Race or color

_____ National origin

_____ Income

_____ Other

What was the date (Month, Day, Year) of the alleged discrimination? _____

Where did the alleged discrimination take place? _____

Please describe as clearly as possible the circumstances as you saw it and why you believe you were discriminated against (include all persons involved):

Please list any and all witnesses' names and phone numbers:

Name: _____ #: _____

Name: _____ #: _____

Name: _____ #: _____

Name: _____ #: _____

Name: _____ #: _____

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

Please attach any documents you have which support the allegation. Date and sign this form and send it to the Title VI Coordinator at the address listed on page 1 of this document.

Your Signature

Print your name

Date

Appendix B: Public Notification Policy for Fare/Service Changes

Public Statement and Purpose

It is the policy of Valley Transit to maintain an open and participative process and to consider public comment prior to a fare change, a major service change, short and/or long-term planning programs, as well as Valley Transit's Title VI Plan, Disadvantaged Business Enterprise (DBE) Plan, and Americans with Disabilities Act (ADA) Plan. Public input is solicited while proposals are under consideration. The public is notified prior to the implementation of any recommendations.

Changes requiring a public process

Changes includes changes defined in the Valley Transit Title VI policy including but not limited to:

- A Major Service Change is defined as any change in service on any individual route that would add or eliminate more than 20% of the route revenue miles or 20% of the route revenue hours. All Major Service Changes will be subject to an equity analysis which includes an analysis of adverse effects.
- A service change leading to an adverse effect is defined as a significant geographical or time based reduction in service which includes but is not limited to: span of service changes, frequency of changes, route segment elimination, re-routing, or route elimination. A disparate or disproportionate change is defined by Valley Transit's Title VI policy as impact to 5% of low-income or minority population(s) as compared to the population not meeting that criterion.

Any Fare Change

Any fare change will be subject to the following public input and involvement process:

Procedures

In order to ensure the maximum opportunity for public input and involvement in the decision process regarding Major Service Changes and fare changes, Valley Transit adheres to the following procedure:

1. Provide at least a 45-day advance notice of public hearings regarding Major Service Changes, or fare changes in both English and Spanish.
2. Customers, the public, and the community will be informed of the proposed change, comment process, and public hearings by way of newspaper notices/news releases, onboard fliers, postings at Valley Transit buildings, and the Valley Transit website in English and Spanish.
3. Public Hearings held at the Valley Transit Board Room shall commence at times accessible by Valley Transit buses.
4. All input and comments including minutes of public hearings, recommendations of the general public, and Valley Transit staff recommendations shall be provided to the Valley Transit Board of Directors prior to any decision regarding Major Service Changes or fare changes.

Public Comment Procedure

Valley Transit is committed to providing reliable and safe transportation options for the community. Customer service is a primary core value of our organization. The customers of Valley Transit are a fundamental aspect of the business and as such, their feedback is crucial to the growth and development of the agency.

The Valley Transit Customer Comment Policy has been established to ensure that riders of all modes of the system, including Fixed Route, Paratransit, and Rideshare (formerly Vanpool) have an easy and accessible way to provide feedback to the agency. Valley Transit is open to hearing any customer feedback including complaints, comments, suggestions, or concerns.

Customers May Provide Public Comment to Valley Transit in the Following Ways:

1. Customer Comment Cards are available on Valley Transit vehicles and at Market Station
2. Through the US Mail (1401 West Rose Street, Walla Walla, WA)
3. By calling 509-525-9140
4. By emailing info@valleytransit.com
5. Via fax at 509-525-9142
6. In person at the Valley Transit Main Office (1401 West Rose Street, Walla Walla, WA)
7. Via the Language Line (if speaking a language other than English or Spanish) Valley Transit will coordinate this service for customers upon request, or identification of a significant language barrier by staff.

Feedback Review Process

1. All feedback from customers is valued and will be reviewed and distributed to the appropriate agency representative(s).
2. Customer concerns, complaints, or employee commendations will be forwarded to the appropriate department manager.
3. Recommendations for service or system modifications will be sent to the Operations Manager or the General Manger. Questions regarding discrimination or bias will be sent to the Human Resource Department.

Feedback Acknowledgement

Anyone who submits a comment, complaint, or service suggestion to Valley Transit, and requests a response, will receive an initial response within 15 working days, provided legible and functional contact information is provided. Should the period of time needed for a response exceed fifteen (15) days, the person making the comment shall be advised of the status, in addition to receiving a final response. Responses shall be in the requested format (e.g., written, verbal, email, and/or alternative for accessible format).

Information about Policy

Information about the Customer Comment Policy, including how to submit a complaint, will be made available to riders verbally by staff as well as being provided on www.valleytransit.com.

Reporting and Tracking

Staff will complete a summary of customer comments for the Board of Directors and employees for use in reviewing and evaluating service(s). Valley Transit will maintain tracking software for the purpose of tracking all feedback from customers in a manner that provides a unique identification for each comment and allows ready access to information on the status of a comment at any time.

Protection from Retaliation

Valley Transit will ensure the quality of service for persons submitting feedback is not impacted negatively in any way after the submission of such feedback.

Education and Outreach

Valley Transit shall provide information about access to the comment process to riders, employees, agencies that serve people with special needs, and the general public in printed and electronic format such as:

- Valley Transit’s website www.valleytransit.com
- Schedules and Customer Information Guides
- Revenue Service Vehicle postings

Appeals Process

Valley Transit shall provide a formal appeals process to all people who are unsatisfied with the outcome of their service complaint. Appeal responses shall be in the format requested (e.g., written, verbal, email, and/or alternative or accessible format)

Valley Transit Customer Comment Appeals Process

Action By	Action
Customer	Within 10 business days of receiving our response to the comment, the customer may submit in writing to the Operations Manager, a detailed explanation of why the response received is unsatisfactory.
Valley Transit Operations Manager	Investigate and respond to the submitted appeal within seven business days.
Customer	If not resolved satisfactorily, submit in writing to the General Manager, the reason(s) why the received appeal response is unsatisfactory within seven business days.
Valley Transit General Manager	Investigate and respond to appeals submitted within seven business days. The General Manager is the final level within the appeals process.

Record Retention

VT will maintain all records related to comments, complaints, and denials or appeals for at least six years.

Appendix C: Public Outreach Efforts 2020-2023

Date of Event: January 16, 2020
Event: Public Hearing
Purpose: Title VI Outreach
Date of Publication: December 19 & 22, 2019 Walla Walla Union Bulletin
December 19, 2019 LaVoz

Date of Event: March 19, 2020
Event: Public Hearing
Purpose: Equal Employment Opportunity Program Outreach
Date of Publication: March 1 & 3, 2020 Walla Walla Union Bulletin
March 5, 2020 LaVoz

Date of Event: May 29, 2020
Event: Request for Proposals
Purpose: Accept RFP packages for CNG station upgrades
Date of Publication: April 29 & May 3, 2020 Walla Walla Union Bulletin

Date of Event: June 26, 2020
Event: Request for Proposals
Purpose: Accept RFP packages for Comprehensive Operational Analysis
Date of Publication: May 27 & 29, 2020 The Daily Journal of Commerce
May 27, 2020 Walla Walla Union Bulletin

Date of Event: August 19, 2020
Event: Public Hearing
Purpose: Review and comment on Transit Development Plan for 2020-2025
Date of Publication: August 16, 2020 Walla Walla Union Bulletin

Date of Event: September 16, 2020
Event: Public Hearing
Purpose: Exit Conference with a presentation from State Auditor's Office
Date of Publication: September 9, 2020 Walla Walla Union Bulletin
September 10, 2020 LaVoz

Date of Event: October 5, 2020
Event: Request for Proposals
Purpose: Accept RFP packages for Snow Removal
Date of Publication: September 13, 2020 Walla Walla Union Bulletin
September 17, 2020 LaVoz

Date of Event: January 26, 2021
Event: Request for Bids
Purpose: Accept bid documents for the installation and integration of a CNG compressor and equipment
Date of Publication: December 16 & 20, 2020 Walla Walla Union Bulletin
December 17, 2020 LaVoz
December 16 & 17, 2020 The Daily Journal of Commerce

Date of Event: March 30, 2021
Event: Special Meeting of the Board of Directors
Purpose: Review and discuss the results of the Comprehensive Operational Analysis
Date of Publication: March 29, 2021 Walla Walla Union Bulletin

Date of Event: Public Notice
 Event: Public Notice
 Purpose: Time change for the regular meeting of the Board of Directors
 Date of Publication: April 25, 2021 Walla Walla Union Bulletin
 April 29, 2021 LaVoz

Date of Event: August 16, 2021
 Event: Public Hearing
 Purpose: Review and comment on Transit Development Plan for 2021-2026
 Date of Publication: August 8, 2021 Walla Walla Union Bulletin
 August 12, 2021 LaVoz

Date of Event: November 8, 2021
 Event: Request for Qualifications
 Purpose: Accept RFQ packages for the renovation of facilities to accommodate alternative fueled vehicles
 Date of Publication: September 16, 2021 Walla Walla Union Bulletin
 September 16, 2021 The Daily Journal of Commerce

Date of Event: September 21, 2021
 Event: Public Hearing
 Purpose: Exit Conference with a presentation from the State Auditor's Office
 Date of Publication: September 19, 2021 Walla Walla Union Bulletin

Date of Event: September 30, 2021
 Event: Public Notice
 Purpose: Special Board of Director meeting to discuss collective bargaining
 Date of Publication: September 29, 2021

Date of Event: October 14 & October 20 & October 21, 2021
 Event: Public Hearing
 Purpose: Take public comment on the Americans with Disabilities Act (ADA) Transition Plan
 Date of Publication: October 8, October 12, October 18, 2021 Walla Walla Union Bulletin
 October 14, 2021 LaVoz

Date of Event: March 16, 2022 & March 17, 2022
 Event: Public Hearing
 Purpose: Review and receive comments on updates to the Americans with Disabilities Act Policy
 Date of Publication: February 6 & March 6, 2022 Walla Walla Union Bulletin
 February 3 & March 3, 2022 LaVoz

Date of Event: March 17, 2022
 Event: Meeting Notice Change
 Purpose: Time change for regular meeting of the Board of Directors
 Date of Publication: March 13, 2022 Walla Walla Union Bulletin
 March 10, 2022 LaVoz

Date of Event: May 10, May 12, May 19, 2022
 Event: Public Hearing
 Purpose: Review and receive comments on proposed Fare Schedule change
 Date of Publication: April 17, May 1, 2022 Walla Walla Union Bulletin
 April 21, May 5, 2022 LaVoz

May 15, 2022 Walla Walla Union Bulletin
May 12, 2022 LaVoz

Date of Event: June 30, 2022
Event: Public Hearing
Purpose: Entrance Conference with presentation from State Auditor's Office
Date of Publication: June 30, 2022 Walla Walla Union Bulletin

Date of Event: August 9, 2022
Event: Public Hearing
Purpose: Exit Conference with presentation from State Auditor's Office
Date of Publication: August 7, 2022 Walla Walla Union Bulletin
August 4, 2022 LaVoz

Date of Event: August 15, 2022
Event: Public Hearing
Purpose: Review and solicit comments on the Transit Development Plan for 2022-2027
Date of Publication: August 7, 2022 Walla Walla Union Bulletin
August 11, 2022 LaVoz

Date of Event: March 24, 2023
Event: Advertisement For Bids
Purpose: Lobby Remodel/ Restroom Addition project
Date of Publication: March 3, March 10, 2023 Walla Walla Union Bulletin
March 3, March 10, 2023 Yakima Herald-Republic
March 3, March 10 Seattle Daily Journal of Commerce

Date of Event: April 7, 2023
Event: Advertisement For Bids
Purpose: Contract with on-call Buy America Audit, Safety Certification audit and manufacturing inspection service for vehicle procurements
Date of Publication: March 3, March 10, 2023 Walla Walla Union Bulletin
March 3, March 10, 2023 Yakima Herald-Republic
March 3, March 10, 2023 Seattle Daily Journal of Commerce

Date of Event: June 15, 2023
Event: Public Notice
Purpose: June board meeting location change
Date of Publication: June 11, 2023 Walla Walla Union Bulletin
LaVoz confirmed publication date of 6-15-2023 which would not give enough notice

Date of Event: July 20, 2023
Event: Public Notice
Purpose: July board meeting location change
Date of Publication: July 13, 2023 LaVoz – No Confirmation received
July 16, 2023 Walla Walla Union Bulletin

Date of Event: August 17, 2023
Event: Public Notice
Purpose: August board meeting location change
Date of Publication: August 13, 2023 Walla Walla Union Bulletin
August 10, 2023 LaVoz

Date of Event: August 17, 2023
Event: Public Hearing
Purpose: Solicit comments on the Transportation Development Plan for 2023-2028
Date of Publication: August 6, 2023 Walla Walla Union Bulletin
August 10, 2023 LaVoz

Date of Event: September 11, 2023
Event: Advertisement For Bids
Purpose: Contract with on-call Buy America Audit, Safety Certification audit and manufacturing inspection service for vehicle procurements
Date of Publication: July 21, July 28, 2023 Seattle Daily Journal of Commerce
July 23, July 30, 2023 Walla Walla Union Bulletin
July 20, 2023 LaVoz

Appendix D: Valley Transit Public Participation Contact List

Depending on the situation and the relevance, Valley Transit may engage any of the following contacts within the community.

- Aging & Long-Term Care
- Blue Mountain Action Council
- Children and Family Services of Walla Walla
- City of College Place
- City of Walla Walla
- City of Walla Walla Housing Authority
- College Place School District
- Downtown Walla Walla Foundation
- Family Medical Clinic of Walla Walla
- Helpline (Services for those in need)
- Lillie Rice Center (Job Training for Developmentally Disabled Adults)
- Local City & County Clerk Offices: Walla Walla County, Walla Walla City, College Place City
- of Vocational Rehabilitation
- Port of Walla Walla County (Economic Development)
- Providence St. Mary Medical Center
- SonBridge
- United Blind of Walla Walla
- United Way of Walla Walla
- Veterans Medical Center
- Walla Walla Branch-Department of Social and Health Services
 - Division of Children and Family Services
 - Division of Developmental Disabilities
 - Division of Vocational Rehabilitation
 - Home and Community Services Division
 - Welfare/Community Services Office
- Walla Walla Chamber of Commerce
- Walla Walla Community College
- Walla Walla County
- Walla Walla County Sheriff Department
- Walla Walla General Hospital
- Walla Walla Police Department
- Walla Walla Public Schools
- Walla Walla Public Schools Homeless Family Advocate Program
- Walla Walla University
- Walla Walla Valley MPO & RTPO offices
- Whitman College
- WorkSource (Employment Development)
- YMCA
- YWCA

Appendix E: Minority Representation on Committees

Valley Transit does not currently have non-elected citizen committees, but holds open public meetings once a month and always sends the agenda to a local Spanish language newspaper (such as La Voz) as well as publishing additional special notices when any policy or practice changes are being discussed.

Appendix F: Service and Performance Standards

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Introduction

The following document establishes a system wide set of service standards to fulfill the service standard requirements for the FTA Title VI program. Title VI requires all Fixed Route transit operators to develop quantitative standards for all Fixed Route modes of operation for the indicators included herein. The following service standards comply with and have been developed from Title VI Circular FTA C 4702.1B

These service standards will:

- Establish Vehicle Load standards and methods to ensure compliance
- Establish Vehicle Headway standards and methods to ensure compliance
- Establish On-Time Performance standards and methods to ensure compliance
- Establish Service Availability standards and methods to ensure compliance
- Establish Distribution of Transit Amenity standards and methods to ensure compliance

These services standards provide the opportunity to:

- Better serve our community
- Make cohesive service decisions
- Ensure Title VI compliance

A: Objectives and Constraints for Valley Transit

A primary goal of Valley Transit is to provide the best public transportation service possible within the limits of its financial resources. To meet this goal requires simultaneous attention to the following objectives:

- I. Valley Transit should be designed, operated, and maintained so that it is appealing to a large number of people, making it a practical and attractive choice compared to single occupancy vehicles. To achieve this, various aspects of the system should be focused on, such as providing high-quality and efficient services, ensuring smooth connections with other transit providers, offering convenient schedules, keeping fares affordable, optimizing the use of upgraded streets and highways, maintaining well-designed and function infrastructure like shelters and bus stops, and implementing an active marketing campaign to promote transit benefits.
- II. The safety of both the operators and passengers is of the utmost importance. Operating procedures and vehicle maintenance should be carefully managed to minimize the likelihood of accidents and to keep fatalities as exceptionally rare if not completely eliminated.
- III. Valley Transit should be planned in a way that aligns with current land use patterns and also encourages desired changes in how the area evolves over time.
- IV. When considering improvements and expansions to Valley Transit service, the evaluation should not only focus on economic factors but also recognize the essential role of public transit service in providing mobility for those who heavily rely on public transit (“transit dependent” groups). Additionally, the goal is to attract new passengers from other transportation options, ultimately maximizing the return on investment in transit services.
- V. Valley Transit should continuously seek and adopt new and improved designs for transit vehicles as a general practice. The vehicles should prioritize safety, environmental impact,

providing a smooth and comfortable ride, climate control, quiet operation, easy boarding and alighting, sufficient lighting, cleanliness, and a pleasant appearance. To ensure optimal use of the equipment, a major objective is to maintain a high standard of performance among operating and maintenance personnel. This will be achieved through ongoing improvements in recruitment, training, and education, resulting in courteous and well-trained staff who operate the system efficiently and safely.

- VI. Valley Transit service should be designed to minimize total travel time from door-to-door for current and potential passengers. This can be accomplished by enhancing various aspects of the transit journey, including walking, waiting, riding, and transferring between vehicles. To provide the fastest possible trip, Valley Transit should aim to utilize the best available roadways economically. Efforts should also be made to reduce the need for transfers by continuously seeking more direct routes from origin-to-destination. Where transfers are unavoidable, services should be carefully coordinated, and appropriate facilities should be provided to protect patrons from adverse weather conditions. Walking and waiting portions of the journey should be minimized by offering frequent services as closely spaced as possible within budgetary constraints, while allowing reasonable route run times, and the arrangement of routes should ensure reasonable walking distances.
- VII. Improvements to the transit system should be planned in a way that addresses urgent congestion or social disruption issues without hindering the overall development of the evolving system, both in terms of physical infrastructure and financial resources.
- VIII. Proposals for enhanced transit services should be evaluated based on compliance with the guidelines provided in Section B. Additionally, other factors such as overall feasibility, physical, operational, economic, financial, and social merits should be taken into account. Proposals should allow for adaptability to changes in land development and technology, and should be compatible with existing and planned components of the regional transportation network.
- IX. Economically, proposed services should maximize the total benefits (both direct and indirect) while making efficient use of limited financial resources.
- X. Socially, improvements must align with regional development goals, be consistent with growth policies and development plans adopted by the communities served, and demonstrate overall benefits to decision-makers at various levels of government.

B: Standards for Existing Service

1: Vehicle Load Standards

Valley Transit will design its services to keep the number of passengers on its vehicles at a comfortable level, always within the limits of safety. The objective is to provide a seat for every passenger, however in peak periods this means that some passengers may be expected to stand for part of the trip. Consideration is given to matching the capacity of vehicles to the historic ridership levels on a route to avoid unnecessary increases in service levels. If the standard is consistently exceeded for the average calculation, Valley Transit may consider larger vehicles for the route(s) in question, or more frequent service to improve the riding experience for all passenger. (see item five regarding right sizing) All vehicles are wheelchair lift or ramp equipped.

Where services operate on a highway, services will be planned for all riders to be seated. Route segments that have a significant or measurable history of inappropriate passenger behavior may be limited to seated only capacity so the onboard video security can effectively record passenger conduct. The follow are the maximum loading standards for Valley Transit based on percentage of seats provided. All vehicles are assigned based on passenger load, route demand, and run cut.

Operating Period	Load
Base	100%/ No Standees
Peak, Evening, and Saturday	125%

**Passengers as a percentage of seats provided for the designated time standards may be exceeded for individual trips within the time period, but a pattern of this would require service adjustment of some kind.*

2: Vehicle Headway Standards

During peak periods, the frequency of service is usually determined by the load factor standards established above. However, during non-peak periods, Valley Transit has established headways (time between buses expressed in minutes), to guide the provision of service equitably through the Service Area. Policy headways for regularly scheduled service should not exceed 60 minutes. Different routes, service structures, and passenger needs have led to variable headways as listed below.

Service/Route	Headway
Routes 1E, 1W, 2, 3, 4, 5, and 6	30 minutes
Routes 7 and 9	60 minutes
Evening and Saturday Service	45 minutes

**Regularly scheduled service does not include morning and afternoon trippers, or special purpose service designed to meet individual circumstances (e.g., shift changes, etc.).*

3: On-Time Performance Standards

While Valley Transit can't control emergencies or bad weather, it is responsible for fixing mechanical issues, planning schedules, and training operators. Valley Transit schedules are designed to allow enough time for trips to be completed on time under normal traffic conditions. When there's heavy traffic during busy hours, this may change the schedule. One example being that the 30-minute pulse system moves from :15 after the hour to :18 after the hour in the afternoons when school release traffic has a significant impact on route timeliness.

Valley Transit monitors on-time performance on all Fixed Route at all time points. Valley Transit's defines on-time as zero minutes early to five minutes late. Under no circumstances should buses run ahead of schedule. Late operation will be defined as any service that arrives in excess of five minutes beyond a scheduled time. Valley Transit has established a Fixed Route on-time performance standard of no less than 85% of all scheduled time points.

Paratransit vehicles are considered on-time if they arrive within 30-minutes of the promise window the customer agreed upon while making their trip reservation. Valley Transit has established a Paratransit on-time performance standard of no less than 90% of trips being picked up within the promise window. Valley Transit also measures for on-time arrivals for Paratransit trips that were pre-scheduled appointments, and has established a performance standard that no less than 95% of those trips will be on-time.

4: Service Availability Policy

Valley Transit distributes service with the goal of ensuring that 80% or more of the residents in Walla Walla and College Place live within a $\frac{3}{4}$ mile distance of a Fixed Route service line. Access is determined by mapping all active bus routes in the Service Area and calculating the population living within a $\frac{3}{4}$ mile radius of those lines, based on the most recent Census Bureau Data estimates available at that time. They then compare this information to the total population in Walla Walla and College Place.

Valley Transit also enhances its services by connection with other transportation providers through the Market Station Transfer Center. This includes partnerships with Columbia County Public Transit, Grape Line, Kayak, and Milton-Freewater Public Transit that expand the total transportation options for residents in the Service Area.

5: Vehicle Assignment Policy

As explained above, vehicles are assigned based on size and modal function. All Valley Transit vehicles are maintained to the FTA's State of Good Repair standards, and have an equivalent level of amenities and ADA accessibility, relative to age and design. When new vehicles are purchased, it is Valley Transit's practice to replace like with like, unless a significant improvement in the public transit vehicle market has taken place since the last purchase. Given Valley Transit's maintenance standards, vehicle age does not serve as a proxy for the condition of the fleet. Valley Transit strives to distribute vehicle assignments equally between routes by rotating the assignment schedule, so long as the road and city infrastructure on a given route would not prevent a certain size of bus from traveling in that area.

6: Bus Stop Spacing and Other Passenger Amenities Standards

Valley Transit maintains a transfer center/service hub at Market Station, located at 108 West Main Street, Walla Walla, WA. This facility has a resting area for passengers as well as staff, public restrooms, a staffed information window, parking spaces nearby, digital real-time route tracking signage, and security staff on site. There are also several bus shelters located in this transfer center as it serves as the pulse point from which all Fixed Route buses depart.

Valley Transit will plan for bus stops to be placed near key intersections, passenger generators, and transfer points (subject to minimum spacing criteria). The spacing of bus stops should not be less than 1200 feet (at least two blocks) between stops in highly developed areas, and 1500 feet (at least four blocks) in underdeveloped areas (specific major trip generators may require a variance in

stop spacing. Currently, Valley Transit is in the process of correcting spacing issues by relocating or removing some stops that have 700 feet or less between them, that do not have a ride generator that justifies the decrease in service timeliness by closely grouping stops. However, largely the system is compliant with its minimum spacing guidelines.

Valley Transit continues to provide flag stops at this time, where the driver determines it is safe to board or alight passengers. This is not allowed in the downtown corridors due to safety concerns and lack of adequate parking spots. Historically these flag stops have been listed on www.iTransitNW.com, creating some confusion for the passenger as to how flag stops work, and if there will be a bus stop sign at the location posted online. As a part of the route redesign scheduled to publicly launch by January 2025, all flag stops will be removed from the website. The practice of flagging the bus down along the route to board in between regular stops will still be permissible so long as there is a safe place for the driver to stop for the passenger, and the bus is not in one of the downtown corridors.

Stops should be located near street intersections where possible so that passengers are provided with safe access to the bus, buses do not block cross-traffic on intersecting streets, and buses are able to re-enter the traffic stream with minimum conflict. In most instances, these requirements will dictate the use of stops located so that transit vehicles stop after traversing an intersection (referred to as “far-side” bus stops). This standard is to be followed except where traffic conditions may make a “near-side” stop clearly more practical and safer.

The curb area devoted to a bus stop, particularly in heavily traveled corridors and where large numbers of passengers board daily is of critical importance. The objective must be to promote optimum safety for the boarding or alighting passenger, and also to promote the maximum speed of the transit vehicle without seriously affecting the flow of other vehicles. For the safety of the passenger, the length of the bus stop should allow the operator to pull both doors of the bus to the curb. For the safety of pedestrians and other vehicles, the near-side bus stop should allow adequate setback from a crosswalk to facilitate vehicular right turn movements and a clear site path and walkway for pedestrians. For far-sided stops, the length must be adequate for the bus to clear the cross-street and crosswalk and yet give adequate space ahead of the bus to allow it to re-enter traffic without excessive maneuvering. The Institute of Traffic Engineers has established as a recommended practice for bus stop locations a distance of 105 feet between the front of the stopped bus to the front of the preceding parking stall for near-side bus stops, and for far-side bus stops a distance of 80 feet as measured from the rear of a stopped bus to the end of the first parking stall. A mid-block bus stop for a single bus should be 135 feet in length, allowing 45 feet forward and 60 feet to the rear of the bus.

When placing a bus stop near an intersection it should be located in the safest possible position, considering traffic and street conditions, with far-side stops being preferred. Where possible, stops should be located close to signalized intersections. Pullouts should be considered for stops near major trip generators, transfer points, timing points, or anywhere else a bus is likely to have an extended stop time. Additional considerations must be made to adhere to local jurisdictions line-of-site requirements at the time of bus stop installation.

Where appropriate in urban areas, Valley Transit provides various amenities, such as passenger information kiosks, benches, and litter receptacles. These are guidelines for desired levels of service to generate such amenities, but may be modified to reflect the operating budget, and

bandwidth to enable these expenditures. The criteria for distribution are determined through the following:

- Approval of Department of Environmental Quality (DEQ) Categorical Exclusion Process
- Adequate space for accessibility
- Ride demand volume
- Passenger requests (measurable and consistent)
- Staff recommendations
- Public Comment process
- Site availability and right-of-way partnerships or easements
- Budgetary restrictions.

For future amenity additions/constructions, placement review will include (without being limited to):

Bus Stop Passenger Benches

- Established history of passenger stops generating 1400 or more boardings per month
- Adequate space for full accessibility
- Proximity to communities with congregate housing, such as senior residences or higher education facilities
- Proximity to large ride generators such as shopping outlets or medical facilities
- Unique exposure to inclement weather
- Terminals and transfer points

Bus Stop Passenger Benches

- Established history of passenger stops generating 950 or more boardings per month
- Adequate space for full accessibility
- Proximity to communities with high populations of elderly individuals or people with disabilities
- Proximity to large ride generators such as shopping outlets
- Stops with a headway exceeding 40 minutes

Passenger Information Kiosks

- Proximity to passenger stops with an established history of an average of 1650 boardings per month
 - Valley Transit will consider kiosks for stops with a lower threshold if the stop in question has a high percentage of ridership compared to others on the route, and the nearest stop with a kiosk is more than 10 blocks away
- Terminal and transfer points

Litter Receptables

- To be placed at stops with a shelter or waiting area that historically generate unusually high volumes of litter
 - In an effort to be a good community partner, Valley Transit will seek to place a litter receptable at any bus stop in front of a business or residence where the owner has requested one to be placed, there are no ordinances preventing the placement, and Valley Transit has a receptable available for placement

Lighting

- Valley Transit will consider the installation of safety lighting at bus stops in poorly lit areas, or areas where visibility of passengers from the bus may be difficult.
 - Valley Transit will work with property owners, the City, or the County to provide improved lighting that is not disruptive to the surrounding properties

Valley Transit will endeavor to ensure any development around major stops follows transit-supportive design principles – closer to the street, favoring pedestrian connections, meeting all ADA requirements, and customer-friendly amenities in commercial areas.

Valley Transit will work with local jurisdictions to ensure that the area around a transit stop is fully accessible to people with disabilities, including those who use mobility aids. While existing stops may be listed ‘as accessible as feasible’ based on the geographic challenges of their position, no new stop will be placed that cannot meet ADA requirements due to geographic challenges.

Valley Transit will seek to place bus terminals and minor turn around facilities at transit nodes identified as being at the beginning or end of a route, where local services such as shuttles connect, and/or the convergence of two or more routes that are not interlined. Development around the stations and terminals should incorporate into transit-oriented development uses and design principles.

7: User Information Aids

To make public transit services more appealing as an option in the area, Valley Transit aims to provide high-quality information that is easy to find, understand, and attractive for current and potential riders. This is achieved by the provision of:

1. Telephone Information: Valley Transit maintains a central telephone service during regular hours to answer public inquiries courteously while ensuring enough staff is available to handle calls prompt and avoid busy signals. Information is kept up-to-date with all route and schedule details, including any temporary changes.
2. Rider’s Guides/Hand Schedules: Valley Transit keeps printed schedules in an attractive and easy-to-read format. The schedules include route maps, major destinations along the route, and any fare information. The schedules are checked regularly to ensure information is adequate and accurate. Rider’s Guides are available on the buses, at the Administrative Building, on www.valleytransit.com, distributed to community partners (e.g., Chamber of Commerce), and mailed upon request.
3. Schedule Displays: Valley Transit keeps schedule displays in bus shelters around Walla Walla and College Place for passenger convenience.
4. Bus Route Designation: Buses are clearly marked with their route information with digital destination signage at the front of the bus (head sign) and on the side by the front passenger entrance.
5. Advertising: Valley Transit uses standard media advertising sources to reach the general public and encourage them to use the transit system. Advertisement is especially effective when coupled with the introduction of new transit services or for special promotions.

8: Bus Routing Policies

Routing policies play a significant role in determining the quality of public transit services. A number of techniques are used to save costs and improve service efficiency, such as:

1. Branching: This allows more frequent bus service to densely populated areas, usually near the city center. At the same time, it provides less frequent service to sparsely populated

outer areas. For instance, buses might run every 15 minutes to a central point, where they alternate between two branches, resulting in service every 30 minutes to each branch.

2. Turn Back: With this approach, only some of the buses on a route continue beyond a certain point. Some buses return to the starting point (often the city center), while others continue to an outer terminus. This allows for more frequent service on the main part of the route.
3. Through Routing: This involves joining two separate routes to operate as one. Typically, these routes are linked in the downtown area. The choice of routes to be linked should be based on transfer convenience for passengers, making it easier for them to reach their desired destination. This is the basis of the Valley Transit pulse system based around the Transfer Center.

Direct service is an essential goal of routing policies. Because Fixed Route transit cannot match the directness of cars, some route deviation is normal and necessary to serve various transit markets. However, excessive deviation can make transit less attractive compared to single occupancy vehicles.

One common standard for directness is that transit routes between major traffic generators (e.g., downtown and shopping centers) should not exceed 1.33 times the single occupancy vehicle distance between those points. To account for indirect routes with branches and loops, the standard should be applied only to portions of the route carrying more than 10% of the total ridership.

While the factor of directness is an indicator of potential issues, other standards must also be examined. Close examination of ridership can indicate if a route deviation is productive. The coefficient of directness, when considered alongside other standards, can help identify where route modification might be needed.

9: Route Performance

In a transit system, each route is considered a separate service, but we also know that these routes are connected because passengers travel between them. The overall success of the system depends on how well they work together. To figure out how well a route is performing, we need to know how many passengers are using it and how much it costs to run. We can compare the cost per mile of each route to see which ones are more efficient.

If/when fares are charged, we can also look at how many passengers use a route compared to how much money it brings in. Passenger numbers give us a better idea of how well the route serves the community, especially when some riders pay different fares (e.g., some riders may have a reduced fare permit). This way, we can compare routes with different types of passengers and fares more accurately.

The analysis frame work below should be monitored overtime for a pattern, and no route should be terminated for a small window of poor performance that does not show a pattern in the data. Based on the ridership and operational costs, we can evaluate each route in four steps during different times of the year (e.g., winter from September to April and summer from May to August):

1. If a route's ridership is more than 100% of the average for all routes (excluding the Mainline), and in summer, more than 90%, it is considered to be a well performing route, and no changes are needed.

2. If ridership falls between 70%-80% (summer 50%-70%) of the average, review the route to see if there are parts that need improvement. Any significant changes will be discussed with the Valley Transit Board of Directors before being made.
3. If ridership falls between 50%-70% (summer 30%-50%), this is considered a weakly performing route, and it would be reasonable to recommend to the Board that the route be discontinued.
4. If ridership falls below 50% (summer 30%) of the average for all routes (excluding the Mainline), this is considered a poorly performing route and two options exist. If the route requires only a few resources and the overall system can handle the low ridership, it can continue with a review every six months. However, if it requires significant resources to continue, it will be terminated with the Board's approval.
 - a. Typically, Valley Transit will review ridership in the context of route redesign on a longer-term planning range of three to six years, but a change in financial position may require a more frequent review. The time frame of a review every six months described above would be triggered by a change in circumstance such as that.

These criteria apply to existing route and new routes alike. For existing routes, use actual data, and for planned routes, estimate the performance. Saturday Service requires special consideration because so many passengers depend on it. When evaluating Saturday service, we consider the needs of those riders carefully. However, Valley Transit reviews all routes following the same four-step process regularly to make sure they meet the standards.

In addition to looking at overall route performance, review each route segment separately to get a more accurate evaluation. If a particular trip carries less than two passengers regularly, Valley Transit may consider terminating it, but we take other factors into consideration during analysis. This cut-off level of two passengers, while somewhat arbitrary, is a generally accepted level by several small properties. Several factors are considered when arriving at this figure, including the type of rider (e.g., commuter or occasional rider), the length of the trip or time involved, and other direct or indirect costs incurred.

Occasional factors require an evaluation and control methodology (described above) which identifies those routes vary most unfavorably from the service standard. Five possible management actions can be applied to those routes found to be the most under-utilized:

- Service Adjustment
- Route Restructuring
- Route Elimination
- Revenue Source Adjustment
- Increased Route-specific Marketing

Periodic monitoring of the total system not only identifies ineffective service, but enables Valley Transit to judge the effectiveness of individual route performance of all service provided. Changes in ridership and revenue between periods may signal the need for careful attention to other service standards in succeeding periods.

1. Route Performance must be evaluated on a seasonal basis due to high ridership characteristics in the winter attributable to severe weather and student ridership.
2. The Mainline cannot be used to determine system average ridership/miles due to the unusual nature of its high volume which serves all three higher education facilities in the valley and links all routes or major trip generators.

10: Definition of Operating Periods

Operating periods are determined based on the maximum number of passengers than can be carried based on how long it takes for a bus to return to the starting point (i.e., headway control point). Other stops along the route will follow the same schedule as the headway control point.

The total peak period shall be defined as the period between the time limits indicated below:

- Weekdays
 - 7:45 AM – 10:30 AM
 - 2:15 PM – 4:30 PM
- Saturdays
 - None

The maximum peak period is defined as the 30-minute span with the highest number of passengers. The times right before or after that period are defined as the transition period. The transition period is not confined to the 30-minute window on either side of the peak.

The base, or non-peak midday period shall be defined as follows:

- Weekdays
 - 10:30 AM – 2:15 PM (and morning and evening hours outside of peak)
- Saturdays
 - All day

Special periods, such as special event transportation or other unusual situations that create supplementary periods not defined above should be considered on an individual basis.

11: Safety and Perceived Security

Safety standards are directly related to maintaining the lowest possible accident rates expressed in two ways – traffic accidents per hundred thousand miles operated, and passenger accidents per hundred thousand passengers carried. Valley Transit compares their safety data to transit systems of a similar size and nature of operation to determine appropriate benchmarks to measure safety performance. These goals are formalized in the Valley Transit Public Transportation Agency Safety Plan (PTASP) and updated annually based on actual performance data. It is Valley Transit's goal to reduce risk to the lowest feasible and practical level while striving to be among the top 25% of comparable transit systems nationally.

Valley Transit continues to upgrade its safety program, and special efforts are made to continue to upgrade operator training and re-training programs. It is Valley Transit's policy that every accident will be reported immediately. One hundred percent of accidents are analyzed to determine possible remedial actions, and follow up action on all accidents shall be carried out. As it pertains to vehicular accidents, all locations having three or more accidents per year should be included in a high priority correction program with the appropriate municipal and/or traffic officials.

The safety of Valley Transit personnel and property is essential. Fire control equipment shall be maintained in top condition and fire response training should be carried out at frequent intervals. Periodic review of property and equipment shall be made to ensure that Valley Transit meets or exceeds OSHA and L&I requirements for safety.

It is imperative that Valley Transit maintain an aggressive security program to ensure the safety of patrons and employees, and the perceived security of the system as viewed by existing and

potential passengers or employees. Passengers and employees of the system should be secure from acts of violence and the system property should be secure from vandalism, damage, and theft. All buses are equipped with a two-way radio system allowing contact with the dispatcher who will be able to contact local law enforcement. Each bus is also equipped with an emergency button that can be silently activated by the operator. Continuous surveillance of garage facilities, terminal facilities, and major bus stops should be maintained internally through agreements with local law enforcement agencies or contract security. A continuous liaison should be maintained with local law enforcement agencies.

12: Revenue Equipment and Fleet Maintenance

To ensure passengers have a comfortable and enjoyable experience, Valley Transit aims to use attractive and comfortable buses. It is Valley Transit's goal that the average age of its revenue fleet shall not exceed 15 years, and that the maximum age shall not exceed 18 years. Due to excellent in-house maintenance, a vehicle falling outside these parameters may be kept in service so long as the annual maintenance costs remain in-line with vehicles in operation for 15 years or less. Road calls for service shall be kept to a minimum. Maintenance practice and operating procedure should be high enough to provide 100,000 miles between a system reliability failure requiring a bus to be towed back to the garage as defined in the Valley Transit Public Transportation Agency Safety Plan (PTASP).

Buses will be effectively maintained. The agency's Transit Asset Management Plan (TAMP) will prescribe a thorough mechanical and operational inspection schedule for all vehicle types. Through this plan, noise, smoke, and odor will be minimized through the installation of the latest environmentally friendly equipment, and the periodic application of prescribed maintenance procedures in addition to transitioning to zero-emission vehicles as budget and technology advancement allows.

The inside of the buses will be cleaned daily to remove rubbish and dirt. Graffiti and vandalism inside the buses or on bus stops/shelters, will be removed or repaired promptly. Buses will be washed three times per week on the outside, or as needed based on the season. The interior will also be cleaned regularly, including ceilings, walls, upholstery, and floors. All buses will be disinfected via electrostatic sprayer at least once daily.

Bus seats should be contoured or upholstered for passenger comfort. Lighting on buses should be ample for reading by seated passengers, but designed to minimize glare in order to facilitate the driver's vision at night.

C: Standards for New Service and Extensions

The standards and criteria developed in the above criteria apply equally to proposed new services with few exceptions. The following criteria should be estimated on a projected basis:

- Loading standards
- Headways
- Schedules
- Ridership
- Financial performance

Additionally, a liberal growth period should be provided during which less than average ridership is expected while the market builds for the new service. If a new route or extension does not meet the

performance criteria detailed above within the first 12 months, consideration may then be given to curtailing the service.

Valley Transit occasionally receives requests for transit services outside of the Public Transit Benefit Area (PTBA) authority boundaries. The Valley Transit Board service standards for annexing or extending authority boundaries are as follows:

1. In accordance with the Washington statute relative to the creation of PTBA Authority, RCW 36.57A, enacted in 1975, the boundaries of Valley Transit can be enlarged by resolution of the Board of Directors calling for an election or by petition calling for an election (RCW 36.57A.140).
2. Each annexation must be contiguous to the existing PTBA, or extended from the original proposal to become contiguous.
3. Each annexation is subject to majority approval of the Valley Transit Board of Directors.
4. The Valley Transit Board shall grant such approval to extend the PTBA if:
 - a. The addition is deemed to be in the public interest of area residents
 - b. The tax revenue that will be contributed by said area will provide no less than 40% of the estimated cost of service to that area (operating and capital costs)
 - i. The Board may judge that the area to be added requires minimal additional resources and that overall PTBA finances can carry the sub-standard revenue contribution of the area to be added. This should be considered after careful review of a 10-year review of projected financial impacts of new service.
5. The Valley Transit Board approval to extend the PTBA service area will serve only to program the area for future inclusion in the service area. Formal extension remains subject to being submitted to the electorate of the territory a proposition authorizing the inclusion of the area and authorizing the imposition of such taxes authorized to be collected by the authority.

D: Abridged Summary of Standards

1. Loading Standards
 - a. A seat for every passenger except during the maximum peak
 - b. No unsafe overloads
 - c. Maximum 125% of seated load during maximum peak
2. Policy Headways
 - a. Maximum headway for regular base service is to be 60 minutes
 - b. Clock headways to are to be utilized wherever possible
3. On-Time Performance
 - a. No ahead of schedule operation at any time
 - b. Minimum of 85% on-time performance
4. Service Availability
 - a. 80% of residents within $\frac{3}{4}$ mile distance of Fixed Route service line
5. Vehicle Assignment
 - a. Vehicles assigned equally between routes by rotating assignment schedule, so long as infrastructure on the route would permit a vehicle of a certain size to safely travel the area
6. Bus Stop Spacing and Other Amenities
 - a. Safety will be the primary consideration
 - b. Spacing must balance the speed of service against passenger convenience
 - c. Stops will be no closer than 1200 feet (two blocks)
 - d. Stops will be in accordance with the Institute of Traffic Engineers Standards
7. User Information Aids

- a. Telephone information service will be available during normal business hours
- b. Rider's Guides/Hand Schedules will be distributed on all buses
- c. Information centers will be available at select locations

8. Bus Routing Policies

- a. Utilize cost saving devices where possible
- b. Utilize through routing
- c. Provide direct service on the trunk of the route with the factor of directness not to exceed 1.33

9. Route Performance

- a. Establish four levels of monitoring based on passengers per mile (compared to the system average, less the Mainline) for winter and summer seasons

Winter	Summer	Recommendation
100%	90%	Normal monitoring
70-80%	50-70%	Staff Review & monitoring
50-70%	30-50%	Report to Board
Below 50%	Below 30%	Board decision on Continuation

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10. Operating Periods

- a. Weekday peaks from 7:45 AM – 10:30 AM and 2:15 PM – 4:30 PM
- b. Any service hours outside of peak, but primarily 10:30 AM – 2:15 PM

11. Safety and Security

- a. Traffic and passenger accident rates should rank with the best 25% of national average for comparable systems.

12. Maintenance

- a. Average fleet age to be less than 15 years, maximum bus age to be 18 years
- b. Latest environmental controls to be on buses, with zero-emission vehicles deployed as feasible
- c. Mechanical inspection schedule prescribed in the TAMP to be followed
- d. Road calls to be minimized to one per 150,000 miles traveled