

TITLE VI COMPLIANCE

Submitted to:

Federal Transit Administration

October 1, 2024



*Lane Transit District
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October 1, 2024

MEMORANDUM

TO: Karin Vosgueritchian, Area Civil Rights Officer
Federal Transit Administration, Region 10

FROM: Heather Lindsay, Service Planner

RE: **Compliance with Federal Transit Administration (FTA)
Circular 4702.1B (Title VI)**

LTD is a regional transit agency organized in 1970 under the laws of the state of Oregon to provide transit service in Lane County, Oregon. LTD serves the Eugene and Springfield metropolitan areas, as well as the neighboring communities of Coburg, Junction City, Veneta, Cottage Grove, Creswell, Lowell, Pleasant Hill, and portions of the county's unincorporated areas. A board of directors, with members appointed by the Governor, governs LTD. Within the metropolitan area, LTD directly operates fixed-route and bus rapid transit (BRT) service and contracts for Americans with Disabilities (ADA) paratransit service (currently Medical Transportation Management, MTM). LTD also contracts with other operators, such as South Lane Wheels, River Cities Taxi, and Pacific Crest Bus Lines to provide transportation services in designated communities outside of the fixed route service area within Lane County. The population of the service area is approximately 300,000.

LTD operates a network of 32 fixed routes including the EmX the bus rapid transit line throughout the service area. Service is provided weekdays from 6:00 a.m. to 12:30 a.m. Saturday service is operated from 7:00 a.m. to 11:30 p.m. Sunday service operates between 8:00 a.m. and 9:30 p.m. LTD's ADA complementary paratransit service, known as RideSource, operates during the same days and hours of service as the fixed routes in the metropolitan area.

LTD operates 5 active vanpools that travel between our service district and Salem & Corvallis.

The basic adult fare for fixed-route bus service in the metropolitan area is \$1.75. A reduced fare of \$0.85 is offered during all operating hours to youth ages 6-18, eligible persons with disabilities, and persons with a Medicare card. All K-12 students in Lane County can get their free LTD Student Transit Pass from their school, using either the Umo Mobility smartphone app or tap card. This pass allows students in public, private, charter, and home schools to ride LTD buses for free. All Section 5307-funded fixed-route services are included in the half fare program. Honored Riders, defined as persons age 65 or older, are not charged fare for fixed route service in the metropolitan area. A number of group pass options are available, including group rates for transit passes for enrolled students at both the University of Oregon and Lane Community College. The RideSource fare is \$3.50 per one-way trip.

LTD operates a fleet of 109 FTA-funded buses for regular fixed-route and BRT service. Its bus fleet consists of standard and low-floor 40-foot transit coaches and 60-foot articulated buses,

including 18 BRT vehicles. The current peak requirement is 51 vehicles for regular fixed route service and 13 vehicles for BRT service. LTD also has a fleet of 57 cutaway buses and modified mini-vans that are operated by MTM, the RideSource contractor. Fourteen of the vans were directly funded by FTA. Most of the other paratransit vehicles were funded through the Oregon Department of Transportation. Fifteen of the vans were directly funded by FTA. The other paratransit vehicles were funded through a combination of funding from the State Transportation Improvement Fund, the Oregon Department of Transportation and General Funds.

LTD operates fixed route service from the Glenwood maintenance and administration facility on 17th Avenue in Glenwood. RideSource operates from a separate facility on Garfield Street in Eugene. Fixed-route service is oriented around a transit center in downtown Eugene with a companion facility in downtown Springfield. LTD also has nine transit centers throughout the metropolitan area and 21 park-and-ride locations.

PART I: GENERAL REPORTING REQUIREMENTS

I. Annual Title VI Certification and Assurance

The FTA Civil Rights Certification and Assurance is attached (Appendix A).
The DOT Title VI Assurance is on file at FTA. See Appendix A for Lane Transit District Board of Directors approval of the 2024 Title VI Compliance Plan Memo.

II. Title VI Complaint Procedures

Lane Transit District (LTD) has procedures in place to investigate and track Title VI complaints, including a Title VI policy, directions detailing how to file a complaint, an explanation of how the complaint will be investigated, and an LTD complaint form. (Appendix B).

III. Title VI Investigations, Complaints, and Lawsuits

Please see (Appendix C) for Title VI Investigations and Complaints. All complaints were either inconclusive or resolved. No complaints from subrecipients.

IV. Provide Meaningful Access to Limited English Proficiency (LEP) Persons

Introduction:

The vision of Lane Transit District (LTD) is in all that we do, we are committed to creating a more connected, sustainable, and equitable community. LTD believes its services should be accessible to all potential users. It is with this belief that LTD has prepared this program to meet the requirements set forth in Title VI of the Civil Rights Act of 1964 concerning access to services for people with limited English language proficiency (LEP). As a recipient of federal financial assistance, LTD must adhere to the LEP standards set forth. Under Executive Order 13166: Improving Access to Services for Persons with

Limited English Proficiency, LTD is federally mandated to examine the services it provides and to develop and implement a system by which LEP persons can have meaningful access to the benefits, services, information, and other important portions of its programs and activities. LEP includes persons who are unable to communicate effectively in English because their primary language is not English and they have not developed fluency in the English language.

This plan has been developed utilizing the U.S. Department of Transportation's (DOT) LEP Guidance Handbook. The DOT provides guidance to transit agencies receiving federal funding based upon the determination of need, using a Four Factor Analysis. This Analysis includes the following criteria:

1. The number or proportion of LEP persons eligible to be served, or likely to be encountered by a LTD program, activity, or service.
2. The frequency with which LEP persons come in contact with LTD programs, activities, or services.
3. The nature and importance of programs, activities, or services provided by LTD to the LEP population.
4. The resources available to LTD and overall cost to provide LEP assistance.

Lane Transit District's plan outlines the identification process for LEP communities, the ways in which assistance can be provided, staff training that may be required, and how to notify LEP persons that assistance is available regarding LTD activities.

Four Factor Analysis:

FACTOR 1: THE NUMBER OR PROPORTION OF LEP ELIGIBLE PEOPLE TO BE SERVED OR LIKELY TO BE ENCOUNTERED BY AN LTD PROGRAM, ACTIVITY, OR SERVICE.

LTD Experience with LEP Persons

LTD staff interaction with customers of Limited English Proficiency varies depending on the department/function of the employee. LTD interacts with the public at large in a multitude of ways including but not limited to transit service, fare media sales outlets, administrative duties, and public meetings and events. LTD personnel who come in direct contact with customers were asked how often they served a LEP customer. According to this survey, the most frequent contact occurs while customers are in transit.

Census Data

Data from the U.S. Census Bureau describe the English language proficiency of people based on the language they speak at home. Residents of Lane County were asked if they spoke a language other than English and to indicate their ability to speak English as either "very well" or less than "very well."

Table A compares trends over time and geography of the percent of the population five years and older that were reported to speak English less than "very well." The most recent data are from the American Community Survey (ACS) 2012-2016 5-year, 2015-2019 5-year, and 2018-2022 5-year estimates.

Table A. Population that speaks English less than “very well” (5 years or older).

Percent of Population 5 years or older	ACS	ACS	ACS
<i>Speak English less than very well</i>	2012-2016	2015-2019	2018-2022
United States	8.7%	8.4%	8.2%
Oregon	6.1%	5.6%	5.3%
Lane Co.	2.9%	2.5%	2.3%
Eugene Urbanized Area	3.6%	3.0%	2.7%

Source: American Community Survey

This table shows, for example, that nationally 8.2 percent of the population in 2018-2022 reported an ability to speak English less than “very well;” the percentage in Oregon is 5.3 percent.

Within Lane County, 2.3 percent of the population reported less than “very well” English speaking ability. Within the boundaries of the Eugene Urbanized area (approximately the boundaries of the Central lane Metropolitan Planning Organization, which includes the cities of Eugene, Springfield, and Coburg, and which comprises a large part of the Lane Transit District), a comparable 2.7 percent of respondents reported the same level of English proficiency.

People who speak English as a second language come from a variety of lingual backgrounds. The 2018-2022 ACS shows that Spanish, with 16,838 people (4.60 percent), is the only language within the LTD service area that exceeds the Safe Harbor threshold of 1,000 people or 5 percent of the total population. Other prevalent languages include Chinese with 2,102 people (0.57 percent), German with 2,176 people (0.59 percent), French, Haitian, or Cajun with 2,145 people (0.59 percent), and Korean with 1,064 people (0.29 percent). Table B shows the languages as a percent of the population in Lane County.

Table B. Language Spoken at Home (5 years and older). C16001

Language	Estimate	Percent of Population	Speak English Less than "very well"	Percent LEP
Total:	366,441			
Speak Only English	334,906	91.39%		
Spanish	16,838	4.60%	5,296	1.45%
French, Haitian, or Cajun	2,145	0.59%	796	0.22%
German or Other West Germanic Languages	2,176	0.59%	126	0.03%
Russian, Polish, or Other Slavic Languages	1,043	0.28%	188	0.05%
Other Indo-European Languages	2,939	0.80%	1025	0.28%
Korean	1,064	0.29%	371	0.10%
Chinese (Incl. Mandarin, Cantonese)	2,102	0.57%	922	0.25%
Vietnamese	488	0.13%	189	0.05%
Tagalog (Incl. Filipino)	1,001	0.27%	163	0.04%
Other Asian and Pacific Island Languages	699	0.19%	132	0.04%
Arabic	386	0.11%	59	0.02%
Other and Unspecified Languages	654	0.18%	550	0.15%
Source: American Community Survey 2018-2022 Table C16001				

Table C summarizes the trends in the percent of the population (five years and older) within the Eugene Urbanized Area that speaks Spanish and other languages in the home. This table shows a decreasing proportion of the population who speaks Spanish and speak English less than very well in the home since 2012. Other languages also are decreasing in frequency who speak English less than well. The data suggest that Spanish speakers speak English "very well" at comparable rates with those who speak Other Languages. For the 2018-2022 period, of the 5.67 percent of Spanish speakers report speaking English "very well" at 4.11 percent compared to 4.40 percent of the population who speak other languages report speaking English "very well" at 3.27 percent. Overall, the percent of non-English speakers who speak English less than "very well" has started to increase marginally.

Table C. Language ability over time within the Eugene Urbanized area (5 years and older).

	ACS	ACS	ACS
Eugene Urbanized Area	2012-2016	2015-2019	2018-2022
Population 5 or older	242,238	251,070	264,506
Speak only English	89.60%	90.00%	89.91%
Speak Spanish	5.90%	5.60%	5.67%
Speak English Very Well	3.90%	3.90%	4.11%
Speak English Less Than "Very Well"	2.00%	1.60%	1.56%
Speak Other Languages	4.40%	3.00%	4.40%
Speak English Very Well	3.50%	1.30%	3.27%
Speak English Less Than "Very Well"	1.80%	1.20%	1.13%

FACTOR 2: THE FREQUENCY WITH WHICH LEP PERSONS COME IN CONTACT WITH LTD PROGRAMS, ACTIVITIES OR SERVICES.

ACS 2018-2022 data sets for workers aged 16 years and older provide data for travel to work in Lane County. Within ACS data, the mode of transportation by language proficiency was surveyed; Table D below displays the results. The data indicate that LEP by itself is not a deciding factor in the decision to use transit: those who speak English very well have a higher use of transit (9.62 percent) than those who speak English less than very well (2.18 percent).

Those who speak languages other than English at home, no matter with what their proficiency, chose transit less than those in the English-only speaking population (9.62 percent). The data also shows an increase in Work at home (12.37 percent).

Table D. LEP populations by mode used as means of transportation to work within the Lane County (workers 16 years and over).

Mode	ALL	English	Other language proficiency	
			Very well	Less than Very Well
SOV	67.88%	91.96%	5.68%	2.36%
HOV	9.26%	84.78%	9.56%	5.65%
Transit	2.07%	88.19%	9.62%	2.18%
Walk	4.22%	85.18%	12.26%	2.56%
Bike, Motorcycle, etc.	4.19%	87.42%	10.56%	2.01%
Work at home	12.37%	92.38%	6.34%	1.28%

Source: ACS 2018-2022 Table B08113

ACS 2018-2022 data sets for workers aged 16 years and older provide data for travel to work in Eugene Urbanized Area. Table E shows that LEP by itself is not a deciding factor in the decision to use transit: those who speak English very well have a higher use of transit (8.62 percent) than those who speak English less than very well (0.00 percent).

Those who speak languages other than English at home, no matter with what their proficiency, chose transit less than those in the English-only speaking population (9.62 percent). The data also shows an increase in Work at home (14.87 percent).

In addition, in August 2014, LTD conducted a sample survey of LTD bus operators and administrative personnel to find out how frequently they come into contact with an LEP customer and which languages other than English they encounter most. Eighty-two (82) of 85 employees surveyed indicated that they assist LEP customers at least once per week. Seventy-five (75) of 85 indicated that, other than English, Spanish was the language most encountered.

LTD primarily serves Spanish speaking customers with Limited English Proficiency. LTD staff encounter persons who cannot speak any English frequently to rarely depending on the department/function. LTD personnel who come in direct contact with customers were asked how often they served a LEP customer. The survey showed that:

- LTD Administrative personnel serve LEP customers once a week on average.
- Most LTD Administrative personnel assist LEP customers at the Customer Service Center or over the phone.
- LEP Customer assistance is primarily in regards to fare questions, how to ride, or trip planning.

Table E. Mode use by LEP populations traveling to work within Eugene Urbanized Area (workers 16 years and older).

Mode	ALL	English	Other language proficiency	
			Very well	Less than Very Well
SOV	65.68%	90.17%	7.30%	2.53%
HOV	8.55%	87.43%	8.26%	4.31%
Transit	1.38%	91.38%	8.62%	0.00%
Walk	5.10%	86.79%	9.01%	4.20%
Bike, Motorcycle, etc.	4.41%	96.04%	3.41%	0.55%
Work at home	14.87%	93.07%	5.74%	1.19%

Source: ACS 2018-2022 Table B08113

FACTOR 3: THE NATURE AND IMPORTANCE OF PROGRAMS, ACTIVITIES OR SERVICES PROVIDED BY LTD TO THE LEP POPULATION.

LTD provides a wide array of transportation service from the regular fixed-route system to carpool opportunities. Making these services accessible to LEP persons provides choices when it comes to transportation. It is likely that LTD will interact with LEP customers frequently throughout the system through various services and programs. Translating information to a language that is comprehensible will allow LEP customers to take advantage of the services LTD provides.

LTD provides a paratransit RideSource system, which serves customers who are unable to utilize typical fixed-route service. These customers are frequently elderly or disabled citizens, of which some may be LEP customers. This service is vital for customers who are not able to use traditional service.

Tables A through E indicate that minorities in general tend to utilize transit and walking at a higher rate than other modes in traveling to their work places. LTD thus provides an important service to this population.

FACTOR 4: THE RESOURCES AVAILABLE TO LTD AND OVERALL COST TO PROVIDE LEP ASSISTANCE.

LTD is committed to assuring that resources are used to reduce the barriers that limit access to its information and service by LEP persons. LTD will continue to expend a reasonable portion of budgetary dollars to meet its customers' language assistance needs.

LTD assessed its available resources that could be used to provide language assistance and opportunities for improvement. This included identifying bilingual staff, reviewing existing contract for professional translation services, determining which documents should be translated, bilingual staff at the Customer Service Center, and recruitment for bilingual/bicultural employees. LTD will continue to concentrate on the Spanish speaking population as it has the highest rate of home use other than English. However, the results above indicate that LTD must continue to be open to the need to provide language assistance to non-Spanish speakers as the need may arise.

Printed Materials

LTD maintains a list of "Vital Documents." These documents are considered mission critical and will be translated and made available as part of the annual process of updating. Documents not included on this list will be translated upon request. LTD is moving toward translating all materials not just mission critical.

1. *Rider's Guide* route and schedule book
2. Station information outlining routes, schedules, and other specific rider information.
3. Riding rules posters and Title VI notice to beneficiaries.
4. Summaries of key project documents, such as the environmental assessment for the West Eugene EmX project.

5. Paid advertising related to public hearings on service and fares.
6. Annual route review materials posted at stops and stations.
7. Consent and Complaint forms.
8. Written notices of rights.
9. Mission critical signage system wide-all signage that has a potential impact on the ability of customers to utilize LTD's service.

Additional documents and services are available on the LTD website. The website can be translated using Google Translate services by selecting a language from the available drop-down list menu. This service is available on every page of the LTD website.

LTD chooses to translate mission critical signage system-wide and is moving toward translating all material. All signage that has a potential impact on the ability of customers to utilize LTD's service are translated into Spanish. Mission critical signage includes but is not limited to Bus Stop Information posts that contain route schedule information at high usage stations, service changes and disruptions, and LTD contact information.

LTD's FY 2023 - 2024 budget increased from \$3,500 to \$10,000 for voice and printed translation services, we are translating all materials not just mission critical. We are also translating k-12 materials in Chinese and Japanese as well.

Google Translate

LTD recommends www.spanishdict.com, www.translate.google.com, and www.spanishcentral.com/translate/audio to provide translation services to Bus Operators and employees who may require assistance in person or over the phone. All LTD customer service representatives, Dispatch, and secretarial staff have access to this service.

Title VI Notice

Title VI information and documentation is available at www.ltd.org and upon request. Any person who believes he or she has been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with LTD. Any such complaint must be in writing and filed with LTD within 180 days following the date of the alleged discriminatory occurrence. For information on how to file a complaint, contact LTD by any of the methods provided below. Title VI Complaint Forms and instructions for their completion are available on the LTD website, LTD Title VI Policy Statement page.

Public Outreach

LTD conducts public outreach programs within the community concerning proposed service changes. At this time, LTD provides opportunities for language translation, as well as distribution of service change documents in Spanish language translations both on the LTD website and at outreach events. When events with community members that may require translation occur, LTD hires and provides translation services at no additional cost to community members. LTD includes materials in Spanish at all public outreach efforts dealing with service and has bilingual staff available at workshops/forums.

LTD customer research routinely includes opportunities for community input from all citizens. LTD conducts an annual route review that includes on-board surveys and opportunities for customer input on certain routes and service changes.

Employee Resources

LTD has developed instructional opportunities for all employees. Each new class of drivers receives Spanish instructional training in a lecture, video, and situation-based classroom. Basic Transit Spanish classes are open to all LTD employees during new driver training. This occurs approximately four times per year. The class is guided using *Basic Spanish for Transit Employees*, developed by Regional Transit District, Roaring Fork Transportation Authority, and Colorado Mountain College. The class focuses on transit scenarios including trip planning, system use, and fare questions and is taught by LTD employees who have proven Spanish fluency.

All new LTD bus operators are given an Operator Manual during training. This Manual contains an LEP section that highlights operating procedures for assisting LEP customers. This includes explanation of Google translate and other resources available to drivers from LTD.

After analyzing the four factors, LTD developed the following plan for providing language assistance to LEP persons.

LTD Language Assistance Plan

Goals and Objectives

1. Comply with federal regulations¹ to “Improve Access to Services for Persons with Limited English Proficiency” by providing meaningful access to the benefits, services, information, and other important portions of Lane Transit District’s programs and activities for individuals with Limited English Proficiency.
 - a. Translate “vital documents” into Spanish and, if necessary, replace text with pictograms or universal icons.
 - b. Notify Spanish speaking population of the availability of free translation and interpretation, upon request, for non-vital but important documents.
 - c. Identify service changes affecting areas with high concentrations of LEP individuals and develop mitigation strategies.
2. Develop programs and materials to educate both community leaders who serve Spanish speaking LEP populations, and LEP community members about LTD’s services and programs.
 - a. Contact LEP partners to determine culturally appropriate travel-training materials and contact methods for members of their specific communities.

¹ Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency

- b. Using input from community leaders, develop and provide customer orientation to familiarize transit coordinators at Community centers and LEP customers with all LTD services and programs.
 - c. Design new pictograms with community input to replace text in signage where possible.
3. Educate LTD staff regarding LEP programs and policies.
 - a. Work with the Operator Training Department to improve operator training programs related to transporting and communicating with LEP customers.
 - b. Develop standards to certify LTD staff as qualified interpreters and translators.
 - c. Write policy stating *approved individuals whose competency has been established must perform all interpretation and written translation.*

General Strategy

- This program will utilize existing networks² within the Spanish speaking community to contact, engage, and educate community leaders serving Spanish speaking LEP populations and LEP community members about LTD's services and programs.
- Utilize LTD's internal task force to ensure LTD's LEP program and services appropriately meet the needs of Spanish speaking LEP populations and LTD's frontline personnel.
- Create a "one stop shop" within LTD to handle all communications for the Spanish speaking LEP community.

Primary Target Audience

New immigrants whose primary language is Spanish and who read at least some Spanish. Members of this group vary in age, education, and income; however, they tend to live in urban or suburban settings, have access to LTD services, have low incomes, and be transit dependent. Ridership patterns include men and women commuting to work and school, men and women taking children to school and medical appointments, youth riding to school and jobs, and elders going to medical appointments and social activities.

Secondary Target Audience

Recent immigrants from rural areas of Mexico, Central America, and South America. This group is noteworthy because they comprise much of the recent Latino population growth.

Stakeholders

- Internal: LTD management, LEP Task force, LTD staff needing to communicate with the Spanish speaking LEP community regarding legal, service, and ridership issues
- External: Spanish speaking LEP communities; Community-based organizations (CBOs) serving Spanish speaking LEP populations; Lane Community College; state,

² Community based organizations (CBOs), churches, social clubs, business organizations and State, County and city social service agencies.

county, and city governments serving Spanish speaking LEP populations; and Hispanic business groups.

Program Elements

1. Outreach – External stakeholders
 - a. CBOs serving Spanish speaking LEP populations
 - b. Urban Spanish speaking LEP communities:
 - c. Rural Spanish speaking LEP communities
 - d. Hispanic business associations
 - e. State, county, and city governments
 - f. A bilingual LTD staff person at public hearings, open houses, and other service outreach activities
2. Outreach – Internal stakeholders
 - a. Employee training
 - b. Service and scheduling
 - c. Board and Leadership Council
 - d. Capital projects
3. Media – Paid and earned
 - a. Include Spanish when promoting LTD services
4. Training – LTD Employees and Contracted Personnel (Public Safety, Transit hosts etc.)
 - a. Employee training (initial focus on front-line staff: operators, Customer Service, reception)
 - b. Provide staff with a description of language assistance service offered by LTD.
 - c. Offer basic, functional Spanish classes for employees
 - d. Provide staff with specific procedures to be followed when encountering an LEP person, including how to handle a potential Title VI/LEP complaint.
5. Translation Service
 - a. Contract for written translation services
 - b. Contract for oral translation services
 - c. Contract for web translation service or link to translation services
6. Recruit and hire bilingual/bicultural
 - a. Attend job fairs targeting the Latino/Hispanic population
 - b. Place job announcements encouraging bilingual individuals to apply in local newspapers, on LTD's website, through e-mail notifications, and any other medium used to attract potential employees

Monitoring and Updating the LEP Plan

This plan is designed to be flexible. As such, it is important to consider if new documents, services, and technologies need to be made available for LEP persons from monitoring changes in demographics and types of services. LTD will update the LEP as required by U.S. DOT. At a minimum, the plan will be reviewed and updated every three years using

five-year American Community Survey estimates or when it is clear that higher concentrations of LEP individuals are present in the LTD service area.

Dissemination of the Limited English Proficiency Plan

LTD will post the LEP Plan on its website at www.ltd.org. Copies of the Plan will be provided to any person or agency requesting a copy. LEP persons may obtain copies/translations of the plan upon request. Any questions or comments regarding this Plan should be directed to:

Marketing Director
Lane Transit District
PO Box 7070
Eugene, OR 97401
LTD@ltd.org
Phone: 541-687-5555
Fax: 541-682-6111

Please see Appendix M for *LEP Survey*, *LEP Vital Documents*, *LEP Work plan*, *LEP Survey results*, and *LEP Memo*.

V. Notify Beneficiaries of Protection under Title VI

The LTD website, the *Rider's Guide* (Appendix L, Page 2), on-board posters, and information kiosks at both transit hubs contain the following statement or something similar:

LTD operates its programs without regard to race, color, religion, sex, sexual orientation, national origin, marital status, age, or disability in accordance with Title VI of the Civil Rights Act, ORS Chapter 659 A, or other applicable law. See Section II, Title VI Complaint Procedures (Appendix B), which describes how the public can request further information on nondiscrimination obligations and how to file a Title VI complaint against LTD. These documents are available in both English and Spanish.

VI. Additional Information upon Request

LTD will provide the FTA with additional information to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI.

VII. Summary of Public Outreach

The Hispanic/Latino community continues to grow in the LTD service area. LTD policy includes publishing all major marketing materials in both English and Spanish. LTD's

Rider's Guide includes a System Map and timetables and is available on our website and Customer Service Center in Downtown Eugene. LTD also places advertisements and announcements in several Eugene/Springfield newspapers. The *Rider's Guide* information pages are printed in both English and Spanish (Appendix L). Other methods used to disseminate information include the following: public hearings, public notices, community workshops/forums, newspaper advertisements, presentations, newsletters, posters in the buses, an on-board newsletter, LTD's website, etc. LTD directly targets service information and other information materials to the UO and University student housing, and frequently advertises in the student newspaper. Some LTD employees speak Spanish and several LTD Customer Service Center staff are bilingual.

LTD also provides additional bus riding information/presentations in Spanish upon request. Occasionally bilingual materials are produced for special events involving non-English speaking persons. LTD also utilizes an interpreter for persons with hearing loss when requested or when appropriate at public hearings or other District-related activities and meetings. Spanish ads have been placed as part of project-specific public hearing outreach. Targeted postcard and newsletter mailings are often produced in both English and Spanish as part of LTD outreach efforts. If the minority population in the area were to increase to a more significant level, LTD would respond to customer needs and provide additional multilingual materials.

For 2021-2023, LTD focused its outreach efforts on rider appreciation, community members, and students. The goal was to be inclusive and informative.

Student outreach examples: Staff hosted multiple in-person tabling events at schools to promote the free Student Transit Pass. In addition, all materials were translated in 4 languages which includes posters, flyers and social media images.

Community outreach examples: Staff has been working with Centro Latino and tabled at many of their food pantry events to promote riding the bus, a variety of surveys, and the Student Transit Pass. In August of 23, LTD held a Ride, Read, and Rock the Block party at the downtown station. This event was promoted on the English and Spanish radio stations, at low-income housing developments, various food pantry's around town, asocial media, and partner agencies. LTD participated in the Springfield Block Party/Latino festival and hosted a Mariachi band and Salsa dance lessons at the Springfield Station. Staff tabled at a variety of community events including Huerta-Chavez Celebration, Herencia Hispana en Willamette High School, Dia de los Muertos Celebration, Eugene Pride Festival, Disability Pride Festival, Juneteenth, Willamalane's Children Festival, and more.

Rider Appreciation examples: Each quarter, LTD staff hosts a table at the Eugene and Springfield Station. For winter time, we offered hot chocolate and coffee in approved carry-on cups, summertime was hand fans and bottled water, etc. during the summer-time, we also had a varied musician of all different genres perform on Friday afternoons at the downtown station.

Please see *Lane Transit District Service Evaluation Process* in Appendix D and *Fare Changes* in Appendix E for more LTD outreach examples.

Some of LTD's communication channels for its fare changes notification include:

- Legal notices are published in general circulation newspapers, including *The Register-Guard*, the *Eugene Weekly*, and the *Springfield Times*.
- Press releases are sent to all area television, radio, and newspaper outlets.
- Articles are published in LTD's on-board newsletter, *Bus Talk*.
- Posters are placed inside the buses and at LTD's main transit stations.
- Presentations are made to the District's Accessible Transportation Committee.
- Notices are sent via electronic newsletters, website posting, and LTD's *Facebook* fan page.
- E-mail notices are sent to District Group Bus Pass Program employee transportation coordinators.
- Mailings are sent to a list of Title VI organizations (Appendix D).

For any service change the following communication is initiated in both English and Spanish.

- Update website and place information on home page
- LTD Bus Talk Newsletter
- Multiple social media posts (Facebook, LinkedIn, Twitter, and Instagram)
- Push notification through our fare payment app
- News article in local community newsletters
- Signage at Eugene and Springfield Station
- Signage inside buses

The 2018-2022 American Community Survey data indicate that Chinese and Asian populations that speak English less than "very well" have decreased. There was discussion about printing marketing materials in Chinese, Korean, or another Asian language. However, according to input from the UO, the City of Eugene, Lane County, and Asian community members, English is considered to be the most common, universal language among the Asian population in the Eugene-Springfield area.

As stated above, besides the Hispanic community, the other minority communities specifically targeted for information are the UO and occasionally student housing.

LTD's policy regarding outlining the District's responsibility to limited English proficiency (LEP) persons can be found in Section IV. Provide Meaningful Access to Limited English Proficient Persons.

Minority Representation on Decision-Making Bodies

	Total	Composition		
		Minority	Male	Female
Lane Transit District Board of Directors (two vacant positions)	7	1	2	4
Lane Transit District Budget Committee (seven Board members and seven non-Board members) (two vacant positions)	14	2	5	7
Executive Team Lane Transit District	11	1	7	4
Lane Transit District Leadership Council	4	1	2	2
Lane Transit District Pension Trust Committee	6	0	2	4
Lane Transit District Contract Committee (one vacant position)	3	0	0	2
Lane Transit District Strategic Planning Committee (two vacant positions)	15	4	6	7
Lane Transit District Comprehensive and Accessible Transportation Committee (three board members)	9	1	3	6
Lane Transit District State Transportation Improvement Fund Advisory Committee (one vacant position)	15	1	8	6

- The LTD Board of Directors is composed of 7 members and is appointed by the governor of Oregon and confirmed by the state Senate.
- The LTD Budget Committee is composed of the 7-member LTD Board of Directors and 7 community members with expertise in budget areas.
- The agency's Executive Team consists of eleven LTD employees including the CEO, CAO, CPO, and CDO, and the seven Directors that oversee the departments of LTD. Other than the CEO, this is the agency's final internal decision-making body.
- The agency's Leadership Team makes decisions that are operational in nature and will usually have cross-department impact. It is comprised of the four Chief positions.
- The Lane Transit District Pension Trust Committee provides guidance related to LTD's pension plans.
- The Board Contract Committee is composed of three Board members and the Committee's function is to review District contracts of \$150,000 and over and advise the Board of Directors regarding reviewed contracts.

- The Strategic Planning Committee (SPC) is composed of two Board members and several key partners, including the Oregon Department of Transportation, Eugene City Council, Springfield City Council, and Lane County Board of commissioners, in addition to a several other local stakeholders. The role of SPC is to provide the LTD Board of Directors with independent advice on strategic planning issues related to advancing the goals of the Long-Range Transit Plan, including but not limited to, developing the Frequent Transit Network, making better connections, reducing trip and waiting times, bridging the first and last mile, creating safer ways to access service, and optimizing solutions for urban and rural areas.
- The Lane Transit District Comprehensive and Accessible Transportation Committee advises and assists the Board in considering the impacts of potential, proposed, or actual service changes on individuals who are transit-dependent, especially those who are older adults or people with disabilities. The CATC is composed of members representing diversity within typically transit-dependent populations, including but not limited to, older adults, people with disabilities, and low-income individuals.
- The Special Transportation Fund (STF) The Special Transportation Fund Committee is a state-mandated advisory committee that advises the LTD Board of Directors in carrying out the purposes of the Special Transportation Fund (the “STF”) for the elderly and people with disabilities in Lane County.
- The State Transportation Improvement Fund (STIF) Advisory Committee is composed of two non-voting ex-officio Board members and 11 local stakeholders, as mandated by state law. The role of the STIF committee is to advise and assist the District in carrying out the purposes of the State Transportation Improvement Fund and prioritize Projects to be funded by STIF moneys received by the District. The Committee may also advise the District regarding the opportunities to coordinate STIF funded Projects with other local or regional transportation programs and services to improve transportation service delivery and reduce gaps in service.

It is the policy of Lane Transit District to select members for decision-making bodies without discrimination as to race, color, religion, national origin, sex, age, or disability. The District actively encourages minorities and females to participate on such boards, councils, and committees. Special efforts have been made on some of the committees to gain minority representation to include persons with disabilities, such as the Accessible Transportation Committee, Special Transportation Committee, Strategic Planning Committee, State Transportation Improvement Fund, and the LTD Board of Directors.

The Special Transportation Fund Committee is a state-mandated advisory committee that advises the LTD Board of Directors in carrying out the purposes of the Special Transportation Fund (the “STF”) for the elderly and people with disabilities Special Transportation Operating (the “STO”) Grants Program.

VIII. Federal Grant Assistance and Applications Pending

Current Active Federal Grant

Project Number	Funding Type	Funding Year	Description
OR-2019-023-01	LU 5310	FY19/20	<i>Bus Purchase -</i> This grant provides funding for an additional five replacement ADA Accessible less than 30ft buses with security surveillance systems. The new total of vehicles being purchased under this grant will be ten, five from the original agreement and five being added under Amendment 1.
OR-2021-026-00	5310	FY20	<i>Mobility for All (Technology Innovation)</i> – This grant provides funding (Discretionary ID #D2020-MFAP-013) for the LTD Technology Innovation Project which is intended to eliminate barriers to transportation in an effort to improve health outcomes and decrease health disparities experienced by disadvantaged communities.
OR-2022-022-00	CRRSAA 5310	FY20/21	<i>Bus Purchase -</i> This grant will fund the purchase of approximately five (5) ADA accessible, less than 30-foot replacement buses, including security surveillance systems. The vehicles will be used for purchased services from non-profit agencies for transportation services for the elderly and persons with disabilities who are otherwise unable to utilize LTD's regular fixed-route service.
OR-2022-026-00	ARPA 5310	FY 21/22	<i>Bus Purchase -</i> This grant will fund the purchase of approximately five (5) ADA accessible, less than 30-foot replacement buses, including security surveillance systems. The vehicles will be used for purchased services from non-profit agencies for transportation services for the elderly and persons with disabilities who are otherwise unable to utilize LTD's regular fixed-route service. The vehicles will provide additional capacity so riders can safely social distance.
OR-2022-032-00	CRRSAA 5310	FY 21/22	<i>Bus Purchase -</i> CRRSAA funds to assist in the purchase of approximately five (5) ADA accessible, less than 30-foot replacement buses, including security surveillance systems. The vehicles will be used for purchased services from non-profit agencies for transportation services for the elderly and persons

			with disabilities who are otherwise unable to utilize LTD's regular fixed-route service.
OR-2022-050-00	5307	FY 18	This grant will fund security improvements at locations vulnerable to terrorist attacks, vandalism, and other criminal activity. Improvements will focus on the hardening of LTD physical assets and will achieve the highest practical level of safety and security for all modes of transit to facilitate the protection of passengers, employees, revenues and property.
OR-2022-049-00	5307	FY19	LTD utilizes bus wash systems to maintain the fleet in a clean and professional state. On the Glenwood Campus, the bus wash building construction was completed in 1988 with the current bus wash equipment installed in 2005. The components of the current bus wash system have reached the end of their useful life. The new system will improve efficiency, reduce water usage and provide employees with a reliable system. In addition, this project has already received FTA concurrence relative to NEPA requirements.
OR-2023-038-00	5307	FY19/20 and FY 21	The Operation Command Control Center expansion at Lane Transit District's Glenwood campus will renovate a facility constructed in 1989 to provide more productive and efficient service. The renovations will include, but not be limited to new heating, ventilation and air conditioning systems to mitigate the spread of contamination; creating a separate training room to facilitate distancing; and upgrading the shower/locker room/wellness center to effectively protect LTD employees.
OR-2023-038-00	5307	FY19/20 and FY 21	The Petroleum Fuel System Improvements Project will upgrade and replace the petroleum fuel system at Lane Transit District's Glenwood facility to maintain good working condition of this asset. The current system has met its useful life

OR-2024-002-00	5307	FY 19	The Eugene Station Modernization project will renovate a facility constructed in 1996. The improvements will include exterior/interior improvements to provide more comfortable and efficient service. Interior building improvements include redesign of the Customer Service Center (CSC) kitchenette and cash room, the CSC elevator proximity card, CSC real time displays, CSC public restroom upgrades, operations lounge updates, and energy efficient lighting fixtures. Exterior improvements include additional parking for district vehicles and employees, updated signage, crosswalks, wayfinding updates, real time signage, dynamic displays.
OR-2022-043-00	5307	FY18	This grant will fund the purchase of major vehicle system component replacement parts in order to maintain the hybrid fleet in a state of good repair.
OR-2022-057-00	5339 (b)	FY21	This FY 2021 Section 5339 (b) competitive (Discretionary ID# FTA-2021-008-TPM-BUS) grant will fund the purchase of approximately five replacement on-route charged 40-foot ADA accessible battery electric buses with security surveillance systems and AVL equipment. The project also includes travel for bus build inspection including pre and post audits, and onsite vehicle inspections, project management, technical assistance, and chargers.
OR-2024-003-00	5337	FY22/23	This project includes the acquisition of four 60-foot articulated diesel buses for the EmX route. The buses will replace vehicles that have exceeded their useful life and will include security surveillance systems and AVL equipment. This project is also supported with STIF Discretionary funds.
OR-2022-042-00	5307	FY 17/18	The grant will fund the replacement/upgrades of various LTD systems.
OR-2022-047-00	5307	FY 19	The grant will fund the replacement of LTD's financial management system.
OR-2018-025-00	5307	FY 17	The Moving Ahead System planning study will evaluate and assess current / future land uses, environmental concerns, and community needs to facilitate improved connectivity of neighborhoods to jobs, schools, shopping, recreation and other activities.
OR-2018-035-00	FHWA Transfer - 5307	FY 17	This grant will provide funding for the Main St/McVay Locally Preferred Transit Solution planning activities.

OR-2020-039-00	FHWA Transfer - 5307	FY 19	FY 19 FHWA STP XFER 5307 Safe Routes to School Mobility Management Project
OR-2020-056-00	TAP Xfer 5307	FY 19	FY 2019 TAP Funds Transferred to Sec 5307 for the Mobility Management-Safe Routes to School; FY 2019 CMAQ Funds Transferred to Sec 5307 for the Mobility Management-Bicycle and Pedestrian Education
OR-2020-057-00	STBG Xfer 5307	FY 19	FY 2019 STBG Transferred To Sec 5307 for Transportation Demand Management
OR-2020-025-00	5307-CARES	FY 20	CARES Act - FY 2020 Section 5307 for Operating Assistance and Preventive Maintenance for Lane Transit District.
OR-2022-019-00	5307-ARPA	FY 21	ARP Act - FY 2021 Section 5307 - Operating Assistance, Preventive Maintenance, and Security for Lane Transit District

Current Federal Grants In Progress

Project Number	Funding Type	Funding Year	Description
1738-2024-1	5310	FY 22&23	Bus Purchase - This grant includes grant funding for the ADA accessible, less than 30 foot replacement buses, including security surveillance systems. The vehicles will be used for purchased services from non-profit agencies for transportation services for the elderly and persons with disabilities who are otherwise unable to utilize LTDs regular fixed-route service. LTD will own and complete preventative maintenance on the vehicles.
1738-2020-5	XFER5307	FY 19&21	The FTN Safety and Amenity Improvements project will directly improve the safety at and near transit stops and stations. These improvement activities will enhance existing areas along LTD's most frequent corridors; thereby providing safe accessibility to transit.
1738-2023-3	STBG/XFER 5307	FY 23	The FTN Safety and Amenity Improvements project will directly improve the safety at and near transit stops and stations. These improvement activities will enhance existing areas along LTD's most frequent corridors; thereby providing safe accessibility to transit.
1738-2024-2	5307	FY 21	This project includes funds for the preliminary engineering and design, final design, and construction for the Glenwood Roof Replacement

			project, located at Lane Transit Districts (LTD) Glenwood Administration Plaza campus (3500 East 17th Avenue Eugene, OR).
1738-2024-3	5339(a)	FY 21	To secure funding to procure approximately two (2) 40-ft Diesel replacement vehicles to replace vehicles that have met or exceeded their useful life. New buses that will allow us to continue our current level of service with lower emissions, more modern features, and more safe and reliable transportation. Citizens and riders in the Eugene/Springfield metropolitan areas of Lane County. his application includes \$771,753 in FY 2021 Section 5339(a) funds sub-allocated to Lane Transit District from the Eugene, OR UZA for the purchase of approximately two (2) 40-ft Diesel Replacement Vehicles.
1738-2024-4	5339(b)	FY 21	To secure funding to procure approximately two (2) 40-ft Diesel replacement vehicles to replace vehicles that have met or exceeded their useful life. New buses that will allow us to continue our current level of service with lower emissions, more modern features, and more safe and reliable transportation. Citizens and riders in the Eugene/Springfield metropolitan areas of Lane County. his application includes \$771,753 in FY 2021 Section 5339(a) funds sub-allocated to Lane Transit District from the Eugene, OR UZA for the purchase of approximately two (2) 40-ft Diesel Replacement Vehicles.
1738-2022-12	5339(a)	FY 22	To secure funding to procure approximately two (2) 40-ft Diesel replacement vehicles to replace vehicles that have met or exceeded their useful life. New buses that will allow us to continue our current level of service with lower emissions, more modern features, and more safe and reliable transportation. Citizens and riders in the Eugene/Springfield metropolitan areas of Lane County. his application includes \$771,753 in FY 2021 Section 5339(a) funds sub-allocated to Lane Transit District from the Eugene, OR UZA for the purchase of approximately two (2) 40-ft Diesel Replacement Vehicles.
1738-2023-4	5307	FY21	To secure funding to procure approximately two (2) 40-ft Diesel replacement vehicles to replace vehicles that have met or exceeded their useful life. New buses that will allow us to continue our current level of service with lower emissions, more modern features, and more safe and reliable transportation. Citizens and riders in the Eugene/Springfield metropolitan areas of Lane County. his application includes \$771,753 in FY 2021 Section 5339(a)

			funds sub-allocated to Lane Transit District from the Eugene, OR UZA for the purchase of approximately two (2) 40-ft Diesel Replacement Vehicles.
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All Subrecipients shall comply with all federal, state, and local laws, regulations, executive orders, and ordinances applicable to the Agreement or to the implementation of the Project. Without limiting the generality of the foregoing, Subrecipient expressly agrees to comply with (i) Title VI of Civil Rights Act of 1964; (ii) Title V and Section 504 of the Rehabilitation Act of 1973; (iii) the Americans with Disabilities Act of 1990 and ORS 659A.142; (iv) all regulations and administrative rules established pursuant to the foregoing laws; and (v) all other applicable requirements of federal and state civil rights and rehabilitation statutes, rules, and regulations. Subrecipients are to submit reports to LTD's Finance Department for reimbursement, and disbursement conditions include that they are compliant with Title VI.

IX. Analysis of Construction Projects

The Santa Clara Transit Station (SCTS) project constructed a transit station and park-and-ride located on 3 acres on the northeast corner of River Road and Green Lane to replace the current River Road Station which was 0.5 mile south at River Road/Randy Papé Beltline. The SCTS project constructed: 6 bus bays; platform shelters; a park-and-ride with approximately 55 parking spaces and a charging station for electric vehicles; secure bicycle parking; a passenger drop-off/pick-up area with approximately 5 spaces; a driver relief building; and other associated features such as lighting, landscaping and a station sign. A new local road was built along the east edge of the property running north from Green Lane and terminating at the northern site boundary. The project also included a new traffic signal at the River Road/Green Lane intersection and sidewalks and on-street parking along Green Lane and the new local connector street.

There was a need for a new transit station because the existing River Road Station suffered from congestion-related egress challenges, which results in access, safety and congestion issues for transit users and other travelers in the area, as well as operational inefficiencies for the transit services. Future projects on the adjacent Randy Papé Beltline and its on- and off-ramps will exacerbate these issues.

The purpose of this project was to improve access, enhance safety and address congestion issues as well as improve operational inefficiencies of transit services by constructing a new transit station and relocating transit services.

Santa Clara Transit Station (SCTS) - Construction of the SCTS was scheduled for spring 2020 and was operational in February 2021. This project used a combination of local, state and federal funds.

A Documented Categorical Exclusion (DCE) was conducted for this project in compliance with NEPA and other state and federal regulations. An environmental justice analysis was conducted as part of the DCE.

The DCE was submitted to FTA on June 25, 2019 and LTD received a confirmation on the DCE from FTA on November 20, 2019.

The DCE document, appendices and figures, and confirmation letter are included in separate attachments and may be seen in Appendix F.

X. Public Participation

On the third Wednesday of each month, a portion of LTD's regularly scheduled Board meeting is set aside for audience participation. This is in addition to public testimony heard at the public hearings that are customarily held in February and March of each year. Input is received through telephone calls, e-mails, feedback forms, in-person testimony, the LTD Facebook Fan page, etc. Staff and Board members attend business and civic groups, regularly scheduled neighborhood association meetings, as well as events such as the student pass, Huerta-Chavez Celebration, and Herencia Hispana en Willamette High School. The public is encouraged to fill out feedback forms or to talk with the staff at these functions. In addition, mailings also are sent to a list of Title VI organizations, e-mail notices are sent to District Group Bus Pass Program employee transportation coordinators, and presentations are made to the District's Accessible Transportation Committee.

During 2023 and 2024, a Community Steering Council was put together to build a Community Outreach Framework document (Appendix D) which is a foundational guide for how LTD will conduct community engagement around its projects, policies, and programs. The intent of the guide is to help improve interactions with communities in the region in pursuit of better transportation outcomes. A tailored approach to engagement can draw on many different strategies and related tactics, each appropriate in various situations. The framework establishes four overarching strategies that LTD will utilize: 1) Working to build trust, 2) Engaging in collaborative, honest, and transparent conversations, 3) Communicating clearly what people need to hear, and 4) Focusing on riders. The Framework identifies several tactics that LTD can utilize to support and operationalize each of these strategies. Like many other public sector agencies, LTD has limited resources and cannot do everything or be everywhere all at once. Thus, the prioritization of strategies and tactics is critical to maximize their effectiveness. The framework proposes that LTD will prioritize the following: engaging government stakeholders, getting out ahead of the story, being present with riders, and engaging potential opposition.

Please see Appendix D for customer input, Annual Route Review Process, Title VI Mailing List, and LTD Community Outreach Framework Draft.

PART II: PROGRAM-SPECIFIC REQUIREMENTS AND GUIDELINES

I. Demographic and Service Profile Maps, Overlays, and Charts

Please see demographic and service profile maps, LTD's System Map, overlays (Appendix G), and chart in Table I.

II. Service Standards and Policies

Please refer to Lane Transit District's Service Policy (Appendix H) and FY 2023-2024 Service Summary (Table II).

A. Vehicle Load

The assignment of a larger vehicle or tripper service may be considered if it meets the following criteria during a bid period:

- Customer loads consistently exceed 1.75 times the seated capacity of the vehicle; or
- Customers are consistently not accommodated on a trip due to full customer loads and the next scheduled trip is more than 30 minutes away; or
- Customers must consistently stand longer than 20 minutes on an individual trip.

Any proposal to add service to meet observed passenger loads must be balanced against total available fleet and operational resources, and evaluated against the goal of maintaining the balance between frequency and coverage resources established in the Service Allocation section in the Fixed Route Service Policy.

This load standard does not apply to limited service. In addition, LTD policy requires all bus operators to immediately report overloads via radio to the Transit Operations Department when an overload occurs. Records of these overloads are kept on file at LTD. LTD has few bus overload problems; many overloads that do occur are on routes to either the University of Oregon, Lane Community College, or on the two main routes between Eugene and Springfield. The LTD Customer Services and Planning and Transit Operations departments monitor these trips to determine service additions according to the adopted criteria. Bus operator reports and field checks are the most effective means for monitoring vehicle overloads.

B. Vehicle Headway

Based on budgetary considerations and resources, LTD will seek to adequately meet average customer loads and typical traffic congestion, and will include sufficient recovery time on each route to compensate for variations in running time and to provide for bus operator restroom breaks.

Minority and non-minority areas are subject to the same vehicle headway policies outlined in the Lane Transit District Service Policy (Appendix H). Frequency of transit service to minority areas either meets or exceeds LTD's headway policies. (Refer to Table 3 for frequency of service by route type.) Major corridors in minority tract areas typically have transit service every 30 minutes during daytime and non-peak hours, with some hourly service on weekends.

C. On-Time Performance

On-time performance is defined as departing a timepoint between 0 and 4 minutes after the scheduled time. The service reliability standard is that 90% of the buses at significant

timepoints on all routes will be on time. Timepoints will be determined based on ridership, transfer activity, or layover locations. The ideal spacing for timepoints on routes over 60 minutes in length or on rural routes is ten minutes apart or as infrastructure allows. LTD currently has a goal of maintaining 90% on-time performance.

Please see Appendix I for an example of LTD's April 2024 on-time performance.

D. Distribution of Transit Amenities

Refer to the Lane Transit District Service Policy (Appendix H) for criteria for transit amenity distribution. Transit amenities include bus stops, bus boarding pads, shelters, benches, bus information units, and major and minor transit stations.

LTD applies the same criteria for transit amenity distribution system-wide. Most of the minority areas receive frequent transit service. Therefore, most of the amenities, such as shelters, bus stops, pads, and transit stations, are located (and considered a priority to locate) in these areas. See Appendix G for maps. These figures show the Metro Area Minority and LEP Census Tracts with bus stops that have shelters and benches.

There are 1,177 active bus stops in the LTD service area. Bus stops are located virtually every two blocks in the urban area and may be spaced farther apart in the non-urban areas. Concrete boarding pads make most bus stops (87 percent) accessible to customers in mobility devices. Bus stop information units (timetables) also are placed at 408 (35 percent) high-use boarding locations in the system. Most inbound bus stops along the major corridors have information units, and all non-urban routes contain at least one information unit. Criteria for placement of information units include high-use boardings, staff input, and type of service. Currently there are 278 (24 percent) bus shelters in the LTD service area, which are typically found at most high-use boarding locations. LTD also has 587 (50 percent) bus stops with benches at high-use boarding locations. Shelters and benches also are placed at boarding locations with high usage by elderly customers and customers who are mobility impaired.

Major and minor transit stations are located throughout the system at high-use boarding areas, major trip generators, and transfer locations. (Refer to the LTD System Map in Appendix G for facility locations.) The Eugene Station, Springfield Station, and the University of Oregon (UO) Stations are the primary transit stations serving LTD bus riders, and they are located in minority census tract areas. The Eugene Station and the UO are the top destinations in the LTD service area. Criteria for transit station placement are the same for non-minority and minority areas.

Most routes serving minority and low-income areas meet or exceed LTD service standards. Routes that do not meet productivity standards are reviewed annually to determine if service adjustments can be made to improve ridership. Minority areas are subject to the same District route performance criteria and system service standards as non-minority areas. LTD works with various neighborhood groups when significant service changes are proposed.

Please see the census tract maps, (Appendix G), and chart in Table I.

E. Service Availability

Core Routes. Core routes operate primarily on arterial streets, major collectors, and corridors identified on the Frequent Transit Network (FTN) developed in the 2014 Long Range Transit Plan.

Express Routes. Express routes have limited stops and serve the parts of the network with the highest peak demand ridership.

Community Routes. Community routes are designed to provide transit in areas where land use, density, development patterns, or demographic characteristics are not conducive to high ridership transit.

College Routes. College routes are designed to provide transit primarily to university students traveling to the University of Oregon (UO) or Lane Community College (LCC). These routes are characterized by fluctuating frequency to meet demand and line up with class schedules and one-way service to meet demand.

Limited or Rural Routes. Limited routes operate very infrequently within the metro area and rural routes operate mostly (but not exclusively) outside the Eugene-Springfield urban growth boundary. They provide basic “insurance against isolation” for communities within the LTD service boundary that might otherwise not receive service.

BRT/EmX. BRT/EmX lines run primarily in dedicated bus-only lanes with some segments of mixed traffic.

Contracted. LTD may provide service under contract to other entities only if the provision of these services does not interfere with LTD’s ability to meet regularly scheduled and budgeted service obligations and fits within the scope of the agency’s regular operation in terms of route structure, fares, and span of service. Contracted service will be provided in the form of additional trips on existing routes. Requests for deviations on existing routes for contracted service will not be considered unless the request meets the standards for Route Deviations and does not require the use of additional resources. Contracted services will be provided on a full cost recovery basis, or at the discretion of the General Manager; e.g., in 2011 route 79x UO/Kinsrow and route 82 Lane Community College (LCC)/Pearl.)

Route scheduling will take into consideration the following factors:

1. Striving for the spans and frequencies expressed above.
2. Maintaining consistency and clarity of timetables for customers through the use of clock face headways whenever possible (e.g. frequency intervals of 15, 30, or 60 minutes).
3. In scheduling transfers, the efficient operation of the more frequent route shall be a higher priority than ensuring timed transfers.
4. The scheduled running time for routes will adequately meet average customer loads and typical traffic congestion, and will include sufficient recovery time on each route to compensate for variations in running time and to provide for bus operator restroom breaks.

Whenever possible, routes will be structured as two-way line routes between terminal points. Line routes reduce travel time and are easier for the public to understand. Terminal points at both ends of a route will be located at major activity centers where possible to ensure ridership in both directions of operation. Routes will remain on the most direct path possible, using arterials and collector streets to provide the shortest practical travel time between the terminal points.

Loops at the end of routes may be used in limited cases where there is no practical layover or turnaround point at the end of a line or when it is the most practical way to provide neighborhood coverage.

New streets will not be considered for bus routes unless the street and the associated intersections and traffic controls allow for the safe operation of the bus. LTD's Safety Committee is consulted whenever a new street is considered for service.

Deviations from a route's shortest path may be considered to serve a major trip generator or serve an area with a high population of older adults, people with disabilities, or people experiencing poverty. Decisions on route deviations will be based on weighing the benefits of the deviation against the amount of impact to through riders using a specific formula. Appendix C provides the methodology for calculating deviations.

Refer to Table II and Table III for a summary of route performance characteristics, such as ridership, productivity, and frequency. Refer to the Lane Transit District Service Policy (Appendix H) for policy and criteria regarding vehicle load, headway, transit access, amenity distribution, and service provision.

F. System-Wide Service Policies

1. Vehicle Assignment

The Planning & Development and Fleet Maintenance Departments determine vehicle assignments. LTD currently has 109 active vehicles and two different types of vehicles: 40-foot, and 60-foot vehicles with the following series in the active fleet: 1000, 1100, 1400, 6100, 6200, 9100, 15100, 16200, 19100, 19200, 20100, 20200, and 22000 series. (Refer to Table IV for the FY 2022-2023 fleet description.) We have 29 electric 40-foot vehicles that were just recently added (20200 and 22100 series). Currently the 60-foot articulated buses are only on selected trips of eight routes (11, 12, 51, 52, 79x, 81, 82, and 98) and assigned to our 900 BRT/EmX route. A vehicle is assigned to a particular route based upon vehicle criteria listed below.

Vehicles assigned to routes serving minority census tract areas are subject to the same vehicle assignment criteria as bus routes serving the non-minority areas.

- a. Routes and schedules with high ridership typically require high-rider-capacity vehicles. The 60-foot 1000-series, 1400-series, 6100-series, 9100-series,

15100-series, 19100-series, and 20100-series buses are assigned to these routes, such as routes serving the UO and LCC.

- b. All vehicles must have a functioning wheelchair lift/ramp. If a lift/ramp is not functioning, a replacement vehicle with an operating lift/ramp will be reassigned to the schedule.

Other less significant criteria used for assigning vehicles include the following:

- a. The Fleet Services Department may request certain vehicles to be placed into service to rotate mileage on "spare" vehicles.
- b. Occasionally bus operators may request a specific bus because of physical limitations. Vehicle assignment may be changed to accommodate a bus operator.
- c. Vehicle assignment also may depend on weekday vs. weekend service. For example, high weekday ridership routes typically do not have capacity problems on Saturdays.
- d. The entire fleet is equipped with air conditioning and all are low-floor vehicles.

G. Transit Security

In 2003 the LTD Board of Directors passed an ordinance (Ordinance 36) regulating passenger behavior while on District property, including buses. This ordinance was updated in 2014 to reflect changes in laws and regulations. In March 2009, Lane Transit District Resolution No. 2008-008 Contested Case Hearing Procedures was adopted by the LTD Board of Directors in a Special Meeting. This provided procedures for reviewing and/or appealing a Notice of Exclusion.

In 2008 a full-time security manager was hired to oversee all District security issues. Enforcement of Ordinance 36 was originally accomplished by Operations supervisors; but by 2000, it was evident that more training was needed or the District needed to hire a full-time security patrol. A new contracted security patrol was hired in spring 2000 when the new Eugene Station was opened. Security personnel patrolled LTD facilities during most hours of operation.

Along with the opening of the Eugene Station and eventually the Springfield Station in 2007, significant security enhancements were made to include digital video surveillance and access control for all LTD facilities.

In January 2008 the Emergency Preparedness and Security Plan was developed and adopted by the Board of Directors. This plan incorporated FTA and American Public Transit Association (APTA) guidelines and recommendations. This plan was subsequently updated in 2014 and 2017. This plan requires all employees and contract employees to be trained on the procedures, system safety, security, and emergency preparedness plans.

Procedures implemented included the use of Crime Prevention through Environmental Design (CPTED) principles during the design of facilities, signage, video surveillance, employee background checks, access control, identification badges, protection of information and assets, emergency supplies, and reporting security incidents and concerns. The Transit Watch Program, which is a program that encourages riders to be the eyes and ears of the agency, was implemented using signage at LTD's transit stations and on the buses.

In 2008 the District's bus rapid transit system (BRT) was implemented. EmX is patrolled daily by security officers. These security officers began fare enforcement aboard EmX in August 2009. In 2011 a second EmX line began operation, and security is doing fare inspections on that line as well.

In 2016 by an action of the LTD Board, contracted security personnel were replaced by District Public Safety Officers. These Officers as employees of the District, are deeply vetted and highly qualified to provide public safety and system security services to the District's passengers, employees, and assets. Public Safety Officers provide general patrol services and also patrol the fixed route and EmX BRT lines, educating and enabling customers, and in some cases conducting enforcement of District ordinances and State Laws.

Training of District Public Safety Officers includes First aid/CPR/AED, cultural awareness, Defensive Tactics, ADA, crisis intervention, Department of Public Safety Standards and Training (DPSST) required courses, DEI awareness and public relations, among other related topics.

III. Evaluation of Service and Fare Changes

A. Service

Service changes and facility improvements are implemented according to the criteria included in the LTD Service Policy (Appendix H).

Please see LTD's Annual Route Review Description (Appendix D) for LTD's service evaluation process and 2022, 2023, and 2024 service change summaries.

Service between the Eugene Station and the University of Oregon has been enhanced with the introduction of the District's first bus rapid transit service, which began in January 2007. The EmX Green Line provides 10-minute weekday frequency and serves two primary campus stops, along with providing connections at both the Eugene Station and the Springfield Station. A second line was added in January 2011, which serves the Gateway area and Sacred Heart Medical Center at Riverbend. A third line was added in September 2017 that extended the first line out West 11th to the Commerce area.

All minority and non-minority and LEP census tracts are identified. Please see the census tract maps and overlays (Appendix G). Also refer to Table A and Table B, which highlights the 2018 - 2022 American Community Survey for minority and LEP populations by census tracts. The structure of LTD bus routes is organized so that all routes operating in a similar

neighborhood are aggregated into a sector using number groupings. For example, all routes numbered in the 20s operate in South Eugene, all routes numbered in the 30s operate in West Eugene, and all routes numbered in the 70s serve the UO, etc. (see Table II). Please see (Appendix D) for Routes Color Coded. Where appropriate, service levels are measured and analyzed by sector.

Table A

Inventory of LTD Bus Service to Minority Census Tracts	
Minority Tract	Route(s) in Service
10.01	41, 93, 95
12.02	98
13.02	98
19.02	11, 17, 18, 91
19.04	11, 91
20.02	13, 17, 18, 91
21.03	EmX, 12
22.01	66, 67, 96
22.03	66, 67, 96
22.04	12, 66, 67, 96, EmX
23.01	51, 52, 55
25.01	40, 41, 95
25.04	36, 41, 93, EmX
26	40, 41, 95
27	41, 51, 52, 55, 95
28	51, 52, 55, 66, 67
29.02	66, 67, 96
31.03	12, 13, 66, 67, 91, 96, 79x
31.04	1, 12, 13, 66, 67, 91, 96, 98, EmX, 79x
32.01	13, 17, 91, EmX, 79X
33.01	13, 17, 18, 91, EMX
33.02	11, 13, 17, 18, 85, 91, EmX
34	11, 13, 17, 18, 91
35	11, 17, 18, 85, 91, 98, EmX
37	1, 12, 13, 24, 27, 28, 40, 66, 67, 73, 78, 81, 91, 95, 96, 98, EmX, 79X
38.02	12, 13, 24, 27, 28, 36, 40, 66, 67, 73, 78, 81, 82, 91, 92, 95, 96, 98, EmX, 79X
40	1, 12, 13, 40, 51, 52, 55, 66, 67, 91, 95, 96, EmX, 79X
42	40, 41, 51, 52, 55, 95, EmX
43	36, 40, 41, 55, 78, 93, 95, EmX
44.03	33, 36, 41, 55, 78, 95, EmX

44.06	36, 78, 93, EmX
44.07	36, 78, 93, EmX
45.01	1, 12, 13, 24, 27, 28, 33, 36, 40, 41, 51, 52, 55, 66, 67, 78, 81, 82, 91, 92, 95, 96, 98, EmX
45.02	33, 40, 41, 51, 52, 55, 95, EmX
46	33, 36, 78
48	24, 27, 28, 33, 36, 73, 78, 81, 82, 92
9.03	93

Quarter mile buffer used to identify tracts with access to transit route

Table B

Inventory of LTD Bus Service to LEP Census Tracts	
LEP Tract	Route(s) in Service
10.01	41, 93, 95
13.02	98
21.04	12, 91, 79X, EmX
22.03	66, 67, 96
24.03	52, 95
30	1, 12, 13, 66, 67, 91, 96, 79X
31.04	1, 12, 13, 27, 66, 67, 91, 96, 98, 79X, EmX
34	11, 13, 17, 18, 91
40	1, 12, 13, 40, 51, 52, 55, 66, 67, 91, 95, 96, 79X, EmX
41	40, 51, 52, 55, 66, 67
43	36, 40, 41, 55, 78, 93, 95, EmX
44.03	33, 36, 41, 55, 78, 95, EmX
45.02	33, 40, 41, 51, 52, 55, 95, EmX
47	24, 27, 28, 33, 36, 73, 78, 81, 82, 92

Quarter mile buffer used to identify tracts with access to transit route/Census tracts above the county rate of LEP included

B. Service Changes

In 2021-2022, the focus has been restoring service back to Pre-COVID levels. Changes listed below are for Fall bid 2021 and were minor service changes. Changes for Winter and Summer see Appendix D.

- Route 28 Hilyard weekday, the following trips were added: 8:00 a.m., and 3:00 p.m.

- Route 36 W 18th weekday, the 3:00 p.m. departure was changed to 3:15 p.m. A 2:45 p.m. trip was added as well as a 3:40 p.m. trip starting at Churchill High School.
- Route 41 Barger/Commerce weekday, the following trips that were added during the height of the pandemic to comply with load capacity restrictions will be removed: 11:45 a.m., 12:45 p.m., 1:15 p.m., 1:45 p.m. and 3:15 p.m.
- Route 51 Santa Clara weekday, Saturday, and Sunday, timepoints throughout the route were adjusted to better align with the new Santa Clara Station.
- Route 52 Irving weekday, Saturday, and Sunday, timepoints throughout the route were adjusted to better align with the new Santa Clara Station.
- Route 55 North Park weekday, a 5:15 p.m. trip was added.
- Route 66 VRC/Coburg weekday, the following trips were added: 3:20 p.m., 4:20 p.m., and 5:20 p.m. There were various timepoint changes made from 3:00 p.m. to 6:00 p.m.
- Route 67 Coburg/VRC weekday, the following trips were added: 3:20 p.m., 4:20 p.m., and 5:20 p.m. There were various timepoint changes made from 3:00 p.m. to 6:00 p.m.
- Route 79x UO/Kinsrow weekday, the following trips were added: 7:30 a.m. and 8:00 a.m.
- Route 81 LCC/Hilyard weekday, and Saturday, timepoint adjustments were made. Service was added starting at 7:30 a.m. every hour with the last departure at 4:30 p.m.
- Route 82 LCC/Pearl weekday, service has been restored with limited trips. First trip departs Eugene Station at 7:00 a.m. and the last departure is at 5:50 p.m.
- Route 85 LCC/Springfield weekday, service has been restored with limited trips. Hourly service will start at 7:40 a.m. with the last departure from Springfield Station being at 4:40 p.m.
- Route 92 Lowell/LCC Saturday, the 5:30 p.m. trip will now leave at 5:35 p.m. from Eugene Station.
- Route 95 Junction City weekday, a 2:30 p.m. trip has been added leaving from Eugene Station.
- No Service until Further Notice on Routes 27, 73, and 78.

In 2022-2023, the focus has been restoring service back to Pre-COVID levels. Changes listed below are for Fall bid 2022 and were minor service changes. Changes for Summer see Appendix D. For Winter bid 2023 we did a Title VI analysis. The changes for Winter were minor, but we did a Title VI analysis to see what our service looked like. Please see (Appendix J) for LTD's Title VI report. LTD's report was submitted to FTA on January 05, 2023, for review; service began on February 5th, 2023.

- Route 17 5th/Hayden Bridge weekday, Saturday, and Sunday, routing change and timepoint changes on all trips.

- Route 18 Mohawk weekday, Saturday, and Sunday, routing change and timepoint changes on all trips.
- Route 51 Santa Clara weekday, Saturday, and Sunday, routing change on Outbound and timepoint changes on all trips.
- Route 52 Irving weekday, Saturday, and Sunday, routing change on Outbound and timepoint changes on all trips.
- Route 66 VRC/Coburg weekday, Saturday, and Sunday, Weekday timepoint changes on trips 6:30 a.m. through 11:00 a.m. and 4:20 p.m. through 6:00 p.m. Saturday timepoint changes on trips 12:30 p.m. through 3:30 p.m. Sunday timepoint changes on trips 8:00 a.m. through 6:30 p.m.
- Route 67 Coburg/VRC weekday, Saturday, and Sunday, Weekday timepoint changes on trips 10:00 a.m. through 10:30 p.m. Saturday timepoint changes on trips 7:30 a.m. through 10:30 a.m. Sunday timepoint changes on trips 7:30 a.m. through 8:30 p.m.
- Route 79x UO/Kinsrow weekday, the following trip was added: 10:00 a.m.
- Route 81 LCC/Hilyard weekday, timepoint changes on trips 6:30 a.m. through 8:30 p.m.
- Route 82 LCC/Pearl weekday, timepoint changes on trips 7:00 a.m. through 5:50 p.m.
- No Service until Further Notice on Routes 27, 73, and 78.

In 2023-2024, the focus has been restoring service back to Pre-COVID levels. Changes listed below are for Fall bid 2023 and were minor service changes. Changes for Winter and Summer see Appendix D.

- Route 79x UO/Kinsrow weekday, service will resume September 18th with addition of 4 new trips in the evening at 7:00 p.m., and 8:00 p.m., 9:00 p.m., and 10:00 p.m.
- Route 81 LCC/Hilyard weekday, and Saturday, timepoint changes on some weekday trips. Saturday service will resume starting September 16th
- Route 82 LCC/Pearl weekday, reduced summer service will end with the start of the fall service changes on September 10th.
- No Service until Further Notice on Routes 27, 73, and 78.

In 2024, the focus has been restoring service back to Pre-COVID levels. Changes listed below are for Fall bid 2024 and were minor service changes.

- EmX weekday, increase to 10-minute service for most of the day.
- Route 1 Campbell center weekday, add a trip at 5:30 p.m.
- Route 11 Thurston weekday, Saturday, and Sunday, weekday trips were added for 10:00 p.m. and 11:00 p.m. Timepoints were adjusted for most trips on Weekdays, Saturdays, and Sundays.
- Route 12 Gateway weekday, trips were added for 7:00 a.m., 9:00 a.m., and 6:00 p.m. Timepoints were adjusted on weekdays.
- Route 13 Centennial weekday, Saturday, and Sunday, timepoints were adjusted.

- Route 17 5th/Hayden Bridge weekday, Saturday, and Sunday, timepoints were adjusted. Three weekday trips were added.
- Route 18 Mohawk weekday, and Sunday, six weekday trips were added and timepoints were adjusted.
- Route 24 Donald weekday, Saturday, and Sunday, five trips were added on weekdays. Timepoints were adjusted.
- Route 28 Hilyard weekday, Saturday, and Sunday, six trips were added on weekdays. Timepoints were adjusted.
- Route 36 W 18th weekday, Saturday, and Sunday, two trips were added on weekdays. Timepoints were adjusted.
- Route 40 Echo Hollow weekday, Saturday, and Sunday six trips were added on weekdays. Timepoints were adjusted.
- Route 41 Barger/Commerce weekday, Saturday, and Sunday, timepoints were adjusted.
- Route 51 Santa Clara weekday, Saturday, and Sunday, timepoints were adjusted.
- Route 52 Irving weekday, Saturday, and Sunday, timepoints were adjusted.
- Route 55 North Park weekday, timepoints were adjusted.
- Route 66 VRC/Coburg weekday, and Sunday, two trips were added on weekdays. Timepoints were adjusted. The Pearl street deviation on Sundays was removed on trips 8:30 a.m. to 3:30 p.m.
- Route 67 Coburg/VRC weekday, two trips were added on weekdays. Timepoints were adjusted. The Pearl street deviation on weekdays was removed on trips 5:00 p.m. to 5:30 p.m.
- Route 79x UO/Kinsrow weekday, ASUO contracted trips from 6:30 p.m. to 10:00 p.m. were removed per ASUO request. Timepoints were adjusted.
- Route 92 Lowell/LCC weekday, and Saturday, timepoints were adjusted.
- Route 93 Veneta weekday, Saturday, and Sunday, timepoints were adjusted.
- Route 95 Junction City weekday, Saturday, and Sunday, timepoints were adjusted.
- Route 96 Coburg weekday, and Saturday, timepoints were adjusted.
- Route 98 Cottage Grove weekday, Saturday, and Sunday, timepoints were adjusted.
- No Service until Further Notice on Routes 27, 73, and 78.

Please see Appendix D for Annual Route Review (ARR) and service change summaries.

Please see LTD analysis (Appendix J) for the impact on minority and low-income areas.

C. Fare Changes

Lane Transit District's Fare Policy outlines the practice of raising one or more fares annually. This long-standing practice has allowed the District to make small, incremental increases in fares by rotating changes and providing customers with the ability to shift to more economical fare types. Please see Appendix E for fare changes for 2022-2023, pricing history, and LTD's Fare Policy. LTD discontinued fare collection and made the

system free March 19, 2020 through February 1, 2021. In July, LTD launched Umo (pronounced "you-mo") an electronic fare payment system, allowing riders the flexibility to prepay and reload fare value to a mobile device or tap card. Electronic readers are installed on all buses, except EmX, next to the farebox. Once an account is set up and fare added, riders can scan their mobile device or tap card at the electronic reader when boarding. The electronic fare payment system also allows for fare capping. Fare capping is a money-saving benefit for riders that pay fare using Stored Value with a tap card or the Umo Mobility app. Once you've paid total fares equal to the cost of a Day Pass or 1-Month Pass, no fare will be deducted for the duration of that day or calendar when you scan your tap card or Umo app. Electronic fare reduces boarding times, improves rider experience, and reduces more than 85,000 non-recyclable bus passes each year.

IV. Monitor Transit Service

Lane Transit District will, at a minimum of once every three years, measure the level and quality of service to minority areas using the sampling methodology in FTA Circular 4702.1A. In addition, LTD will evaluate and recommend service improvements once each year during the Customer Services and Planning Department's Annual Route Review. As part of the Annual Route Review, Customer Services and Planning Department staff will monitor the service to minority areas to ensure that nondiscriminatory transit service is provided.

Since 2003 all LTD buses have been equipped with automatic passenger counters. Data obtained with the counters includes route, trip, and stop level data. Table III includes route ridership data.

The annual service improvements are subject to public review and a public hearing process. See Appendix D for a copy of FY 2021-2024 service improvements. With approximately 48 organizations participating, nearly 35,500 individuals are provided group bus passes to access LTD services. The opportunity to gain feedback from this segment of the District's ridership is important and is made easier because of the contractual relationship. LTD staff meet regularly with representatives from Lane Community College and the University of Oregon. These meetings include student leadership and administration staff. LTD frequently advertises in campus newspapers to reach the broader student body. Other group pass organizations designate employee transportation coordinators who participate in quarterly meetings to learn about service changes and new services. This group is regularly tapped for feedback on fixed-route changes and comments on group pass rate changes as they come up for review. LTD's Accessible Transportation Committee is included along with internal employee and LTD Board committees. The general public is notified through newspaper ads, press releases, direct mail, etc. LTD customers are provided with the highest level of information, including bus signage, rider newsletter articles, signage at transit stations, signage at affected stops, open houses, etc.

As major service change proposals are evaluated through the public process, changes are incorporated and analysis is completed. The objective of this analysis is to determine if

disparities exist in service quality to minority and non-minority areas and if LTD has been responsive to customer service needs.

The geographic boundary of Lane Transit District encompasses the urbanized area within which lies the majority of the residences and employers of the District and within which the majority of travel occurs. The Central Lane Metropolitan Planning Organization (MPO) is responsible for regional planning in this area and collaborates with LTD on analyses.

LTD conducts service change analyses using a methodology that calculates 'people-trips.' This method allows for a comparison of changes in geography and in level of service at the same time. People-trips are intended to measure the potential to take transit trips.

People-trips are calculated by estimating the number of individuals within the service area of the route and multiplying this number by the number of trips for each day type of the route. Partial trips are counted as one half trip. To calculate the number of individuals living within the service area of a route, Census demographic information is attached to household address data provided by Lane Council of Governments (LCOG). This allows for more accurate estimates of the population in a region than proportionally splitting block groups that are not completely contained within .25 miles of a route.

Once a base line of service has been established, the change in people-trips at the route level are calculated. For instance, if a route is extended to 100 new people and makes 5 trips per weekday, there are 500 additional people-trips per weekday. Conversely, if a route serving 1,000 riders has a service cut from 5 trips per weekday to 4 trips per weekday, the data would show a loss of 1,000 people-trips each weekday. These two service changes can be compared because they are expressed in the same units.

Disproportionate impacts and disparate burdens can be calculated by comparing the change borne by low-income populations and minority populations against the regional averages for these groups respectively. The difference between the change borne and the regional average provides a way to assess whether service changes are aligned with LTD's service policy regarding equitable service distribution.

As different protected populations reside in different areas of the region, changes in service in different areas can result in some protected populations receiving new service benefits while others have existing benefits removed. The overall decision as to whether or not a disparate impact occurs is taken in the context of the entire system performance.

Summary for Winter 2023 changes (Appendix J)

Please see Appendix J for full Winter 2023 Title VI report. LTD reduced service for Winter 2023 to align service levels with available bus operations staff and current operational parameters. The changes for Winter were minor, but we did a Title VI analysis to see what our service looked like. The follow changes were proposed:

Weekday Service Hour Changes:

- EmX: Weekday service on EmX will be reduced to 15-minute frequency for most of the day between Commerce Station and Gateway Station/Riverbend. During the afternoon peak, additional trips have been added from Eugene Station to Springfield Station, providing approximately 7.5 minute frequencies on the Franklin EmX segment.

- Route 11 - Thurston: Seven trips will be eliminated and time points will be adjusted.
- Route 17 - 5th/Hayden Bridge: Two trips will be added and time points will be adjusted.
- Route 18 - Mohawk: Time points will be adjusted.
- Route 28 - Hilyard: Three trips will be removed.
- Route 36 - W. 18th: One trip will be removed.
- Route 40 - Echo Hollow: Two trips will be removed.
- Route 41 - Barger: One trip will be removed.
- Route 55 - North Park: One trip will be removed.
- Route 67 - Coburg/VRC: Time points will be adjusted.
- Route 82 - LCC/Pearl: Seven trips will be removed.
- Route 93 - Veneta: The 6:45 a.m. trip will now start at 6:46 a.m.

Discussion

LTD reduced access (as measured in people-trips) by approximately 5% total. One route will receive additional service. Nine routes will see a service reduction. Trips on routes were selected to provide minimum disruption to LTD's riders, maintain the highest level of accessibility, but also to match service level to available operations staff and capacity.

The majority of the reduction in people-trips occurs as the result of changing the frequency of EmX from every 10 minutes to every 15 minutes for most of the day. This change is mitigated by the addition of trips during the peak period to accommodate ridership between Eugene Station, University of Oregon, and Springfield Station, which is the highest ridership segment of the EmX system. Frequency on that segment will be 15 minutes for most of the day, with periods as frequent as every 7 minutes.

Additionally, reductions on Route 11 represent a high proportion of the total loss in people-trips. Route 11 is the second most frequent line in LTD's system. Though service will be reduced, Route 11 will still feature 10 to 20-minute frequencies for most of the day.

In total, minority people-trips constitute 22% of the total reduction. Low income people trips represent 46% of the reduction. Compared to their regional average, LTD's minority population and low-income population will be impacted at a rate 2% greater and 13% greater, respectively, than their populations average as a proportion of the regional population.

The proposed changes to the system provide equitable benefits to the District's minority and low-income populations, and no discrimination is noted.