



Title VI Program



**For the Federal Transit Administration and Washington
State Department of Transportation**

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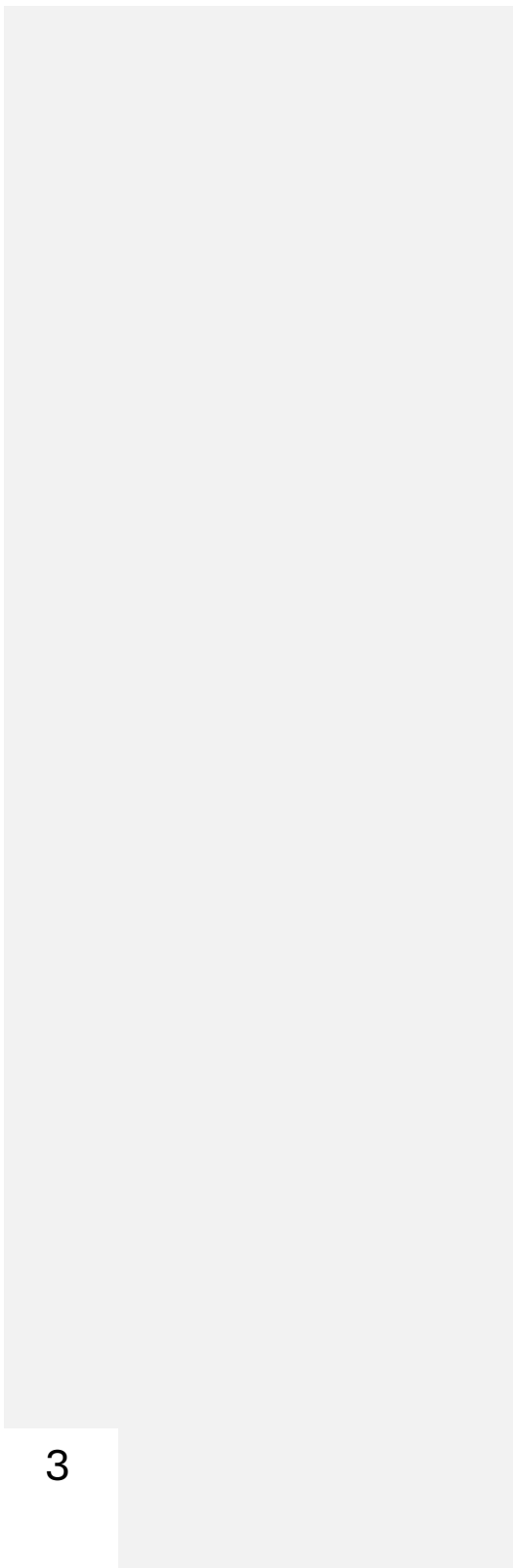
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Chapter 1: Title VI

I. Introduction to Title VI

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

Link Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its transit services on the basis of race, color, national origin, or LEP status as protected by Title VI of the Civil Rights act.

II. Title VI Mission

Link Transit's Title VI Program's primary goal is to ensure all management, staff, contractors, local agencies, and service beneficiaries are aware of the provisions of Title VI and the responsibilities associated with Title VI of the Civil Rights Act of 1964.

The Title VI Program is responsible for providing leadership, direction, and policy to ensure compliance with Title VI, EJ, and LEP principles. The program also aims to ensure that social impacts to communities and people are recognized and considered throughout the transportation planning and decision-making process.

III. What is Title VI?

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs or activities receiving federal financial assistance. Related statutes and Presidential Executive Orders under the umbrella of Title VI also address protections for EJ, LEP individuals, women, and people with disabilities. When an agency accepts federal funds, all of its programs and activities are covered by Title VI, regardless of their funding source.

IV. What does this mean for Link Transit?

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

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

This plan documents Link Transit’s efforts to comply with these requirements.

VII. Title VI Notice to the Public

NOTIFYING BENEFICIARIES OF THEIR RIGHTS UNDER TITLE VI

Link Transit does not discriminate on the basis of race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes they have been discriminated against based on race, color, or national origin may file a Title VI complaint with Link Transit.

To file a complaint, contact:

**Mail: Link Transit
Title VI Coordinator
300 South Columbia Street
Wenatchee, WA 98801**

Email address: titlevi@linktransit.com

Phone number: (509) 662-1155

Commented [CB1]: Link will need to determine a designated Title VI coordinator (and update relevant email lists and phone numbers) in my absence; would be good to confirm prior to this plan going to the Board

Complaints must be filed within 180 days of the alleged discriminatory action. This Title VI Notice to the Public is posted on our website at linktransit.com and at Columbia Station (300 South Columbia Street, Wenatchee WA). A Title VI Complaint Form is available in this plan, on our website, at our Operations and Maintenance Facility (2700 Euclid Avenue, Wenatchee, WA), and at Columbia Station (300 South Columbia Street, Wenatchee, WA). Individuals who believe they have been discriminated against may request a complaint form from our Guest Services staff or [Human Resources staff](#).

Commented [CB2]: Julie & Lynn - please note and let me know if there are any concerns

For more information about Link Transit’s Title VI obligations or to request information in another language, please contact the Title VI Coordinator at the above contact information.

AVISO A LOS BENEFICIARIOS DE SUS DERECHOS BAJO EL TÍTULO VI

Link Transit opera sus programas y servicios sin discriminación por motivos de raza, color u origen nacional, de conformidad con el Título VI de la Ley de Derechos Civiles de 1964. Cualquier persona que crea haber sido discriminada por motivos de raza, color u origen nacional puede presentar una queja bajo el Título VI a Link Transit.

Commented [AC3]: Get formally translated

Para presentar una queja, contacte a:

Correo Link Transit **Correo electrónico:** titlevi@linktransit.com
Postal: **Coordinador del Título VI** **Número de teléfono:** (509) 662-1155
300 South Columbia Street
Wenatchee, WA 98801

Las quejas deben presentarse dentro de los 180 días siguientes a la presunta discriminación. Un Formulario de Queja del Título VI está disponible en nuestro sitio web, en nuestras instalaciones de Operaciones y Mantenimiento (2700 Euclid Avenue, Wenatchee, WA), y en Columbia Station (300 South Columbia Street, Wenatchee, WA). Los individuos que crean haber sido discriminados pueden solicitar un formulario de queja a nuestro personal de Servicios para Huéspedes o personal de Recursos Humanos.

Para más información sobre las obligaciones de Link Transit bajo el Título VI o para solicitar información en otro idioma, comuníquese con el Coordinador del Título VI utilizando la información de contacto mencionada.

Chapter 2: Filing a Complaint

I. How to File a Title VI Complaint

Link Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its transit services on the basis of race, color, or national origin, as protected by Title VI of the Civil Rights Act. If you believe you have been subjected to discrimination under Title VI, you have the right to file a complaint. The following procedures outline how to file a Title VI complaint:

1. **Complaint Filing Timeline:** You may file a signed, written complaint no later than 180 days from the date of the alleged discrimination.
2. **Required Information:** The written complaint must include the following information:
 - Your name, mailing address, and preferred contact information (e.g., phone number, email address).
 - A detailed description of the incident, including how, when, where, and why you believe you were discriminated against. Please provide any specific details such as location, names, and contact information of witnesses.
 - Any other relevant information that will assist in the investigation of the complaint.
3. **Complaint Form:** For your convenience, a Title VI Complaint Form is available below, on our website, and at our Columbia Station location and at our Operations and Maintenance Facility location. However, use of the form is not required as long as all required information as described above is included.
4. **Submission:** Your complaint may be submitted to Link Transit by mail, phone, or email:

Mail: Link Transit

Title VI Coordinator

300 South Columbia Street

Wenatchee, WA 98801

Email address: titlevi@linktransit.com

Phone number: (509) 662-1155

Note: It is recommended to send complaints via certified mail or another trackable method to ensure receipt.

II. What Happens After a Complaint is Filed?

1. **Complaint Acknowledgment:** Upon receipt of your complaint, Link Transit will acknowledge it in writing within 10 working days excluding major holidays. We will review the complaint to determine if it falls under Title VI jurisdiction (i.e., allegations of discrimination based on race, color, or national origin).

2. **Assistance:** Link Transit will provide reasonable assistance to any individual needing help in filing a complaint, including those with disabilities or limited English proficiency (LEP).
3. **Investigation Process:** If the complaint is accepted for investigation, Link Transit will initiate a formal investigation process. In some cases, additional information may be needed from the complainant. Failure to provide the requested information may result in administrative closure of the complaint.
4. **Resolution:** Once sufficient information is gathered, Link Transit will:
 - Prepare a written response.
 - Share the findings with the complainant.
 - Review the response internally, including legal review if necessary.
5. **Administrative Closure:** If the investigation determines that there was no violation, or if the complaint lacks sufficient evidence, the complaint may be administratively closed. In such instances, Link Transit will inform the complainant of the closure and the reasons for it.

III. Notification of Outcome

1. **Final Response:** Link Transit will send the complainant a written final response. The response will include the outcome of the investigation and any corrective actions, if applicable.
2. **Appeal Process:** If you disagree with the final decision, you have the right to:
 - **Appeal** the decision within 7 working days from the date of receipt of the final written decision.
 - **File a complaint with external agencies**, including:
 - U.S. Department of Transportation (USDOT)
 - Federal Transit Administration (FTA) Office of Civil Rights
3. **Record Keeping:** Link Transit will retain copies of all complaints, investigative reports, and written responses for a period of no less than three (3) years. Records of complaints will be reported to the FTA during the Title VI Program submission cycle, including the total number of complaints, how they were resolved, and any corrective actions taken.

IV. Federal Transit Administration Contact Information

If you wish to file your complaint directly with the FTA, you may send your written complaint to:

Mail: **Federal Transit Administration Office of Civil Rights**
 Attention: Title VI Program Coordinator
 East Building, 5th Floor – TCR

**1200 New Jersey Ave., SE
Washington, DC 20590**

Note: Complaints to the FTA must be filed within 180 days of the alleged discriminatory action.

V. Complaint Form

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

Español:

Título VI de la ley de derechos civiles de 1964 requiere que "ninguna persona en los Estados Unidos, por razón de raza, color u origen nacional, se excluirá de la participación en, ser negada los beneficios de o ser sujeta a discriminación bajo cualquier programa o actividad recibir asistencia financiera federal". Si usted siente que ha discriminado en los servicios de tránsito, por favor proporcione la siguiente información para ayudarnos a procesar su queja y envíe al nombre que se enumeran a continuación:

Mail: Link Transit
Title VI Coordinator
300 South Columbia Street
Wenatchee, WA 98801

Email address: titlevi@linktransit.com
Phone number: (509) 662-1155

TITLE VI COMPLAINT FORM/TÍTULO VI FORMULARIO DE RECLAMACIÓN

Please print clearly/Favor de escribir claramente

Section I/Sección I:		
Name/Nombre:		
Address/Domicilio:		
Telephone Number/Número Telefónico:		
Email address/ dirección de correo electrónico:		
Accessible Format Requests?/¿Solicitudes de formato accesible?	Large Print/ letra grande	Audio Tape/cinta de audio
	TDD/desarrollo dirigido por pruebas	Other/Otro
Circle all needed/ Circula todo lo necesario		
Section II/Sección II:		
Are you filing this complaint on your own behalf?	Yes/si*	No
*If you answered “yes: to this question, go to Section III/ Si respondió “sí” a esta pregunta, pase a la Sección III		
If not, please supply the name and relationship of the person for whom you are complaining/ De lo contrario, proporcione el nombre y la relación de la persona por quien presenta la queja:		
Please explain why you have filed for a third party/ Explique por qué ha presentado una solicitud en nombre de un tercero:		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party/ Por favor confirme que ha obtenido el permiso del parte agraviada si presenta la presentación en nombre de un tercero	Yes/si*	No

Section II/Sección II:	
Please indicate why you believe the discrimination occurred/Sírvanse indicar por qué cree que la discriminación ha ocurrido:	
Circle all needed/ Circula todo lo necesario	
Race / Raza	Color / Color
National Origin / Orígenes Nacionales	Income / Ingreso
Other (specify) / Otro (especifica):	
What was the date of the alleged discrimination?/¿Cuál fue la fecha de la presunta discriminación?	
Where did the alleged discrimination take place?/¿Dónde ocurrió la supuesta discriminación?:	
Please describe the circumstances as you saw it/Por favor describa las circunstancias como Udlo vio:	

Please list any and all witnesses' names and phone numbers/Sírvase proporcionar todos los testigos con los nombres y números de teléfono:	

What type of corrective action would you like to see taken?/¿Qué tipo de medidas correctivas le gustaría ver?

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

Por favor de adjuntar todos los documentos que usted tiene, los que sostienen la acusación. A continuación, favor de apuntar la fecha y firmar el formulario y enviarlo al Coordinador del Título VI a la dirección que aparece en la página número 1 de este documento.

Your signature/Su firma

Print name/Nombre imprimido

Date/Fecha

Chapter 3: Record of Title VI or Other Civil Rights Investigations, Complaints, or Lawsuits

I. Requirements & Summary

In compliance with Title VI of the Civil Rights Act and the Washington State Department of Transportation (WSDOT) guidelines, Link Transit is required to maintain and update a record of any investigations, complaints, or lawsuits alleging discrimination on the basis of race, color, national origin, or other civil rights violations under Title VI. This record is essential for demonstrating compliance with Title VI, and it will be submitted to the FTA as part of the required Title VI Program updates every three years.

Link Transit will maintain the following documentation for each Title VI-related investigation, complaint, or lawsuit:

- The date of the investigation, complaint, or lawsuit.
- A summary of the allegations.
- The status of the investigation, complaint, or lawsuit (e.g., pending, resolved, or closed).
- Actions taken by Link Transit in response, including any corrective measures or adjustments to service or policies.

II. Summary of Investigations, Complaints, or Lawsuit

In accordance with Title VI of the Civil Rights Act, Link Transit must report the following information in its Title VI Program submission to the FTA:

- The number of active investigations conducted by the FTA, other federal or state agencies, or local jurisdictions.
- The number of Title VI-related complaints received by Link Transit, regardless of resolution.
- The number of lawsuits alleging discrimination under Title VI that were filed against Link Transit.

The following is a summary of any such actions over the past three years:

- Investigations: None
- Complaints: None
- Lawsuits: None

As of the date of this plan, Link Transit has not been subject to any Title VI investigations, complaints, or lawsuits within the past three years.

III. Reporting to the FTA

Link Transit is required to report this information to the FTA as part of the triennial Title VI Program submission, regardless of whether any investigations, complaints, or lawsuits have occurred. Even in the absence of such actions, Link Transit will provide a statement confirming that no investigations, complaints, or lawsuits have been filed.

IV. Record Maintenance

Link Transit will maintain detailed records of all Title VI-related complaints, investigations, and lawsuits for a minimum of three (3) years. This documentation will be made available to the FTA and WSDOT upon request during audits, reviews, or other compliance checks. These records will include:

- Copies of the original complaints or lawsuits.
- Documentation of investigation processes and findings.
- Written responses to complainants or other involved parties.
- Details of any corrective actions or service adjustments made as a result of investigations, complaints, or lawsuits.

Chapter 4: Monitoring Subrecipients

I. Requirements & Summary

In compliance with Title VI of the Civil Rights Act and the Washington State Department of Transportation (WSDOT) guidelines, Link Transit is required to include a description of how the agency monitors its subrecipients for compliance with Title VI, and a schedule of subrecipient Title VI Program submissions.

II. Summary of Subrecipients

Link Transit has no subrecipients at this time.

III. Reporting to the FTA

Link Transit is required to report this information to the FTA as part of the triennial Title VI Program submission, regardless of whether Link Transit has any subrecipients. Link Transit will provide a statement confirming there are no subrecipients.

Chapter 5: Equity Analysis

I. Requirements & Summary

In compliance with Title VI of the Civil Rights Act and the Washington State Department of Transportation (WSDOT) guidelines, Link Transit is required to complete an equity analysis during the planning stage of a new construction project to ensure the location is selected without regard to race, color, or national origin. Link Transit is required to engage in outreach effort to individuals who are potentially impacted by the siting of facilities.

II. Summary of New Facilities

Link Transit has not purchased any new land to build any new facilities.

III. Reporting to the FTA

Link Transit is required to provide additional information to the FTA upon request.

Chapter 6: Non-elected Committees & Councils

I. Requirements & Summary

In compliance with Title VI of the Civil Rights Act and the Washington State Department of Transportation (WSDOT) guidelines Link Transit is required to provide a table depicting the membership of members of transit-related, non-elected planning boards, advisory councils, or committees broken down by race, and a description of efforts made to encourage the participation of minorities on such committees.

II. Summary of New Facilities

Link Transit does not currently have any transit-related, non-elected planning boards, advisory councils or committees.

III. Reporting to the FTA

Link Transit is required to provide additional information to the FTA upon request

Chapter 7: Limited English Proficiency (LEP) Plan

I. Overview

Link Transit is committed to overcoming language barriers by implementing consistent standards of language assistance across its service area, ensuring meaningful access for individuals with LEP. These individuals, whose primary language is not English, may have difficulty communicating effectively. Under Title VI of the Civil Rights Act of 1964, agencies receiving federal funding must take reasonable steps to ensure LEP persons have meaningful access to programs, services, and information.

II. Four-Factor Analysis

Factor 1: Number or Proportion of LEP Persons in the Service Area

Based on the 2022 American Community Survey (ACS) Five-Year Estimates, Chelan and Douglas Counties have significant populations of residents who do not speak English as their primary language and speak English "less than very well." Spanish is the dominant language spoken by LEP individuals.

Language	Chelan County	Douglas County
English Spoken at Home	73.9%	71.5%
Language Other than English	26.1%	28.5%
Spanish Speakers	22.7%	25.4%
English Less Than "Very Well"	10.1%	12.2%

Factor 2: Frequency of Contact with LEP Individuals

LEP individuals interact with Link Transit daily across various services, including bus services, paratransit, demand response services, and customer service interactions. Approximately 10-12 contacts are made daily with Spanish-speaking individuals via guest service representatives. Approximately 12% of our riders are LEP individuals according to our most recent on-board survey in 2023. Link Transit staff, including guest service representatives and operational staff, are trained to assist LEP individuals, with many staff members being bilingual.

Factor 3: Nature and Importance of the Service to LEP Persons

Link Transit provides essential public transportation services that are critical for LEP individuals to access employment, education, healthcare, and other necessary services.

Commented [AC4]: Ask Deborah about guest service. Ask Josh to look into survey results for onboard service data?

Commented [CB5R4]: Was this ever confirmed?

Commented [AC6R4]: Yes!

Link Transit offers both fixed-route and paratransit services as well as mileage reimbursement program and rideshare program. Translators for travel training are available to ensure LEP persons can access the full range of transit services.

Factor 4: Resources Available and Costs to Assure Meaningful Access

Link Transit provides the following resources to ensure LEP individuals have meaningful access:

- **Bilingual Staff:** As of this plan date, Link Transit employs bilingual (Spanish/English) guest service representatives, supervisors, and operators. Approximately 25-30% of coach operators are bilingual.
- **Language Line Services:** Link Transit subscribes and trains staff to utilize Language Line, which connects staff to interpreters in over 240 languages.
- **Outreach Program:** Spanish-speaking customers are provided with assistance on how to ride the bus, including one-on-one travel training with the use of an interpreter as needed
- **Partnerships:** Link Transit partners with local organizations like Community for the Advancement of Family Education (CAFÉ) to provide additional translation and interpretation services as needed.

Commented [CB7]: As requested?

Commented [AC8R7]: As needed

III. Language Assistance Plan

1. **Publications:** Essential materials such as schedules, Rider Alerts, and the annual Ride Guide are available in both English and Spanish. Public meeting notices and other key documents are translated into Spanish to ensure that LEP individuals are informed of important updates.
2. **Public Meetings:** Upon request Link Transit provides Spanish-language translation services at public meetings and ensures that bilingual staff are available to assist LEP participants.
3. **On-Board and Street-Side Information:** Transit schedules, stop information, and announcements on buses are available in English and Spanish to ensure LEP individuals can navigate the system effectively.
4. **Digital and Printed Media:** Link Transit's Title VI policy, complaint forms, and service-related information are provided on the website and in printed materials in both English and Spanish to meet the needs of LEP populations.
5. **Language Line Services:** Link Transit's partnership with Language Line Services enables real-time access to professional interpreters in over 240 languages. Link transit trains staff members in dispatch, operations, and customer service how to utilize this tool.
6. **Outreach and Education:** Interpreters and bilingual employees help with outreach to large employers, educate LEP communities about transit services, and promote

Commented [AC9]: Lynn is looking into this

Commented [CB10]: Does this imply Board meetings or no?

Commented [AC11R10]: Yes

programs such as zero-fare services. Outreach efforts ensure that LEP individuals understand how to access Link Transit's services.

VI. Implementation and Monitoring

1. **Ongoing Monitoring:** Link Transit uses ridership data, onboard surveys, and Census data to regularly assess the needs of LEP individuals. Annual reviews of Language Line usage, community feedback, and service performance help identify any areas needing improvement.
2. **LEP Population Surveys:** An on-board survey was conducted in 2023 in both English and Spanish to assess existing transit service needs, including for LEP populations. Link Transit will continue to conduct similar surveys approximately every five years or as needed to keep up-to-date with changing demographics.
3. **Hiring Practices:** Link Transit prioritizes the hiring of bilingual staff, particularly for roles that interact with LEP individuals and the public.
4. **Budgeting for Language Services:** Link Transit budgets annually to maintain and expand Language Line services, in addition to maintaining partnerships with organizations like CAFÉ for translation and interpretation support.

V. Compliance with 49 CFR 21.9(d)

Link Transit complies with **49 CFR 21.9(d)** by providing beneficiaries with information about their rights under Title VI. This includes prominently posting the Title VI policy statement and complaint forms in both English and Spanish on the website, and administrative offices. LEP individuals are informed of their rights and the procedures for filing a complaint.

Chapter 8: Public Participation Plan

I. Introduction

Link Transit is dedicated to ensuring that all residents, especially historically underserved populations, have meaningful access to public participation opportunities in transportation planning, in compliance with Title VI of the Civil Rights Act of 1964. This Public Participation Plan (PPP) outlines how Link Transit will engage the public. Link Transit's outreach efforts seek to involve traditionally underrepresented groups, including minority, low-income, and LEP populations, as required by the Title VI of the Civil Rights Act.

II. Goals and Objectives

The primary goal of this PPP is to ensure that all citizens, including low-income, minority, and LEP populations, have the opportunity to contribute, have access to information about our programs, and participate in the development of plans and projects. To achieve this, the objectives are:

- Identify non-English languages and cultural barriers that impact public participation.
- Provide accessible and clear notifications of public meetings in English and Spanish to ensure broad outreach.
- Ensure meetings are held in accessible, welcoming locations that are transit-accessible, ADA-compliant, and located near communities with significant minority and LEP populations.
- Offer multiple channels for two-way communication with populations unlikely to attend meetings, such as online comment forms and virtual meetings.
- Use visual aids (charts, maps, photos) to enhance understanding of the material.
- Incorporate culturally relevant communication methods to engage diverse communities (e.g., partnerships with local community organizations).
- Encourage feedback via online surveys, phone, and in-person meetings.
- Evaluate the effectiveness of outreach efforts and adjust strategies as needed based on community feedback.

III. Public Participation Methods

Link Transit employs a variety of methods to engage the public, with special attention to minority, low-income, and LEP populations:

1. **Public Notices:** Information about public hearings and meetings is sent to local entities such as newspapers, media outlets, community centers, libraries, churches, and posted on Link Transit’s social media, and website.
2. **Public Hearings:** Held to discuss major service changes, fare increases, and planning documents such as the Transit Development Plan (TDP).
3. **Board Meetings:** Monthly Board of Directors meetings are open to the public, with Spanish-speaking representatives available for assistance upon request. Meeting notices are made available in Spanish and posted at high-traffic public locations such as transit centers and libraries.
4. **Outreach to Minority and LEP Populations:** Interpreters or Spanish-speaking staff assist with outreach, public meetings, and travel training programs to ensure engagement with the Spanish-speaking population, which comprises a significant portion of the service area. Link partners with local organizations to extend outreach to LEP communities.
5. **Bilingual Services:** Essential documents, including service announcements, the Ride Guide, feedback form, printed materials, and the Title VI, are available in both English and Spanish. Additional languages may be accommodated based on community needs as identified in the four-factor LEP analysis. Language Line services are available for additional languages.
6. **Surveys:** Link Transit conducts surveys (both online and in-person) in English and Spanish to gather community feedback on service changes and needs. Surveys are distributed at locations that are frequented by low-income and minority populations, such as grocery stores, health clinics, and schools.
7. **Travel Training:** Link Transit offers travel training for all individuals and can provide training for Spanish-speaking residents with the services of an interpreter to ensure everyone understands how to use transit services effectively. Bilingual travel training materials are made available in Spanish and tailored to the needs of those over the age of 60 and LEP populations.
8. **Virtual Meetings and Online Tools:** Link Transit provides virtual public meetings to engage a broader audience, particularly for individuals who may face barriers attending in-person events. Webinars and other online engagement tools are used to facilitate participation in service planning and decision-making processes.

Commented [CB12]: Confirming this is current practice?

Commented [AC13R12]: No but we (Lynn, Eric, Lukas) are proposing it is

Commented [AC14]: Selina, I can make you an email list

Commented [AC15]: Highly recommended from resources

Commented [AC16R15]: Lynn will send me the Civil rights contact info to confirm this

Commented [AC17R15]: Whose job is to post them? Selina maybe?

Commented [AC18R15]: Lynn will follow up with other HR at transit to see if they translate and how if they do

IV. Stakeholders

- **General Public:** Riders, residents, and potential users of Link Transit services.

- **Title VI Protected Populations:** Minority groups, LEP individuals, low-income populations, and individuals with disabilities.
- **Community Organizations:** Local advocacy groups representing the interests of underserved communities.
- **Government & Public Agencies:** Local elected officials, social service agencies, and environmental justice organizations that have insight into the needs of underrepresented populations

V. Ongoing Outreach Efforts

Link Transit continues to employ a range of techniques to engage the public, including:

- Presentations to community organizations.
- Interviews with local media (English and Spanish with the service of an interpreter as needed).
- Distribution of public information through newsletters, social media, and press releases.
- Targeted outreach to low-income communities through social service agencies and community-based organizations.
- Use of social media platforms, including Facebook and Instagram, to engage the public in real-time discussions and to promote public meetings. All pictures and graphics with text are in English and in Spanish.
- Surveys distributed on buses and at transit facilities, available in both English and Spanish.
- Use of visual tools like charts, maps, and online platforms to make complex information more accessible.

VII. Monitoring and Evaluation

- Link Transit will monitor and evaluate the effectiveness of its public participation efforts through metrics such as attendance at public meetings, the number of comments received, and demographic data on survey respondents.
- An annual review of outreach efforts will be conducted to identify areas for improvement and ensure that strategies are effectively engaging historically underrepresented and overburdened populations.

VII. Conclusion

Link Transit is committed to ensuring all segments of the population have the opportunity to meaningfully participate. The PPP will be continuously reviewed and updated as necessary to ensure that outreach efforts meet the needs of our community, especially those traditionally underrepresented in public planning processes.

Chapter 9: Service Standards & Policies

I. Introduction

Link Transit operates under established service guidelines and performance measures to ensure equitable access and service efficiency across its network. These guidelines are aligned with FTA and WSDOT Title VI requirements.

II. Service Standards

1. Vehicle load standards for each mode:

Vehicle Make/ Model	Average Passenger Capacities			
	Seated	Standing	Total	Load factor
Gillig 40' diesel	39	12	51	1.0
BYD RIDE 35' battery-electric	36	14	50	1.2
BYD RIDE 35' battery-electric	36	14	50	1.2
BYD RIDE 30' battery-electric	22	7	29	1.2
Gillig 30' diesel bus (SkiLink)	28	8	36	1.0
Champion 27' cutaway	16	5	21	1.2
Champion 26' cutaway	14	4	18	1.2

Vehicle headway: Vehicle headways are the time intervals between vehicles moving in the same direction on a particular route. Shorter headways correspond to more frequent service, and more frequent service normally is determined by ridership demand. Minimum guidelines for headways on Link routes vary by route, time, and day.

“Access to opportunity” considers the ability of transit services to connect current and potential riders with the vast number of opportunities in the community. Routes operating in locations with high transit propensity should be targeted for higher service frequency and service span thresholds to support access to opportunity.

	Urban	Regional Frequent	Rural Coverage	Special	DART
Weekdays					
All Routes	15-60	30-60	60-120	No maximum	N/A
“Access to Opportunity” Routes	30	N/A	60	N/A	N/A
Saturdays					
All Routes	30-60	60	60-120	No maximum	N/A
“Access to Opportunity” Routes	30	N/A	60	N/A	N/A
Sundays					
All Routes	30-60	60	60-120	No maximum	N/A
“Access to Opportunity” Routes	30	N/A	60	N/A	N/A

- 2. On-time performance:** On-time performance measures how closely a transit service adheres to the published schedule. It is an important measure for transit users because it directly impacts service reliability. It is also crucial for timed-transfer systems, as buses arriving more than five minutes late at Columbia Station may result in missed connections. On-time performance is measured by comparing scheduled and actual bus departure and arrival times at fixed time points (bus stops identified in published schedules). Link Transit monitors on-time performance on all fixed routes via Avail Technologies CAD/AVL software. To precisely measure on-time performance, a definition of on-time must be established. Link Transit uses a fixed-route measure that defines “on-time” as up to one minute earlier and no more than five minutes later (between -1 minute and +6 minutes) than the scheduled arrival

time at all time points. Minimum on-time performance percentages are defined below.

Urban	Regional Frequent	Rural Coverage	Special	DART
85%	85%	85%	85%	+/- 15 minutes scheduled client pick-up

3. **Service availability:** Link Transit measures service availability by distance between bus stops. Bus stops should be placed at most intersections, passenger generators, and transfer points subject to minimum spacing criteria.

The spacing of stops should not normally be less than 700 feet in developed areas (two blocks) and 1,500 feet in underdeveloped areas. However, specific major trip generators may require variances in stop spacing. Currently, Links stop spacing minimum standard is 3/4 mile in urban areas. Regarding service along highway corridors, Link still authorizes flag stops where it is safe to board and alight passengers.

Link Transit will consider new or revised routes to serve residents, places of work, middle and high schools, major shopping centers and public facilities in the urban, regional, and small communities that are beyond 3/4-mile walking distances.

As of November 2024, Link Transit is reviewing our service standards related to service availability, and updated information is expected in the next Title VI Plan.

III. Service Policies

1. **Transit Amenities:** Bus stops at intersections should be located in the safest position, considering traffic and street conditions. Where possible, stops should be located close to signalized intersections. Where appropriate in urban and rural areas, Link will provide various amenities such as passenger information kiosks, benches, and litter receptacles. Amenity criteria is described below.

Development around the major stops should be encouraged to follow transit supportive design principles—closer to the street, favor pedestrian connections, and customer friendly uses in commercial areas such as coffee shops, or passenger amenities.

Link Transit works with local jurisdictions to ensure that the area around transit bus stops is accessible to people with disabilities, including wheelchairs and other mobility aids. The long-term objective of Link Transit is to accommodate accessible features at all of its stops.

As of November 2024, Link Transit is reviewing our service policies related to transit amenities, and updated information is expected in the next Title VI Plan.

AMENITY CRITERIA	
Bus Stations / Terminals	Bus terminals and minor turnaround facilities will be located at transit nodes identified as being at the end of a line and convergence of two or more corridors, where local services such as shuttles also connect. Development around the stations and terminals should incorporate into transit-oriented development uses and design principles.
Passenger Bus Shelters	<ul style="list-style-type: none"> Passenger stops generating 10 or more boardings per hour. Senior residences and institutional facilities, if appropriate. Unique exposure to inclement weather. Terminals and transfer points. Safety lighting at shelters in poorly-lit areas.
Pull Outs	Pull outs should be considered for stops located near major trip generators, transfer points, timing points, or anywhere else where a bus is likely to have an extended stop time.
Passenger Information Kiosks	All signed bus stops on all routes.
Benches / Simme-Seats	<ul style="list-style-type: none"> Bus stops generating 4-9 passengers per hour. Bus stops near senior residences.
Litter Receptacles	Placed at shelters and waiting areas that may generate unusually high volumes of litter.

2. **Vehicle Assignment:** Link will design its services to keep the number of passengers on its vehicles at a comfortable level, always within the limits of safety. Consideration is given to matching the capacity of the vehicles to the ridership levels on the route to avoid unnecessary increases in service levels. In peak periods, this means that some passengers may be expected to stand for part of the trip. In off-peak periods, services will be designed to try to provide a seat to all off-peak customers, given the less frequent service. Where services operate on a highway, services will be planned for all riders to be seated. All vehicles are wheelchair lift equipped.

Regional routes are assigned 40' vehicles when available. Because of the longer trip times, these vehicles are equipped with reclining seats and reading lights for passenger comfort. The larger vehicles also allow for more seating for longer trips at highway speeds.

In the Wenatchee urban area, vehicles are typically electric buses that are 30' to 35' in length. These vehicles are assigned to the urban routes because their size allows them to travel more easily within the urban environment; they are also equipped with both front and rear doors for ease of access and exit. While many of these vehicles are among the newest in Link Transit's fleet, range and charging requirements associated with electric vehicles necessitate that these vehicles

operate primarily in an urban context. Link Transit intends to bring additional vehicle chargers on-line in other areas of the region (such as Leavenworth and Chelan) to facilitate electric vehicle operations in other locations. Vehicles in the urban area are currently assigned based on passenger load, route demand, miles traveled, and run cut and circulate throughout the urban area in minority and non-minority neighborhoods alike.

Vehicles with smaller passenger capacities, such as the Ford cutaways, are normally assigned to routes in smaller communities with lower ridership demand. Link Transit also operates seasonal ski service to Mission Ridge. These vehicles are equipped with ski and snowboard racks.

VI. Conclusion

Link Transit's service standards are designed to support its mission of providing equitable, reliable, and efficient transportation services. The ongoing evaluation of routes, performance measures, and service modifications ensures that Link Transit remains compliant with Title VI requirements and continues to meet the needs of its diverse population.

Chapter 10: Board Approval

I. Board Approval

This section will be updated to include meeting date and relevant public comments.

A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. The approval must occur prior to submission to FTA.

Commented [CB19]: Is this section required?

Commented [AC20R19]: Yes!