

SUNSET EMPIRE TRANSPORTATION DISTRICT



TITLE VI PROGRAM

Adopted: September 23, 2021

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Introduction

Sunset Empire Transportation District (SETD) is committed to providing transportation services to the public and ensures that no person shall, on the ground of race, color, national origin, religion, age, marital status, sexual orientation, gender identification, or disability be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity provided by SETD.

Title VI Complaint Procedures

Any person who feels they have been discriminated on the grounds of race, color, national origin, religion, age, marital status, sexual orientation, gender identification, or disability by SETD may file a complaint by submitting the Title VI complaint form. Members of the public may file a signed, written complaint to SETD up to one hundred and eighty (180) days from the date of alleged discrimination. A sample Title VI Complaint Form can be found as **Attachment A**. Complaints must at a minimum contain the following information:

- Contact Information; name, mailing address, and how to contact complainant (i.e., telephone number, email address, etc.)
- How, when, where and why complainant alleges s/he was discriminated against. Include the location, names and contact information of any witnesses.
- Other significant information.

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

Sunset Empire Transportation District
Attention: Jeff Hazen, Executive Director
900 Marine Drive
Astoria, Oregon 97103
Email address: jeff@ridethebus.org
By Phone: (503) 861-5399
By Facsimile: (503) 325-1606

Record of Title VI investigations, complaints, or lawsuits

SETD will document, record and report all Title VI complaints and allegations of discrimination to the United States Department of Transportation (USDOT) and the Oregon Department of Transportation (ODOT). SETD has had no Title VI complaints, investigations or lawsuits filed against it over the reporting period.

Language Assistance Plan

A full copy of the Language Assistance Plan is included in **Attachment B**. Key elements of the plan include:

- SETD's employment of Spanish speaking staff to translate, interpret or for communication in person or over the phone.
- All meeting notices will be posted in Spanish and English.
- The entire SETD website can function in English and in Spanish with the Google Translate feature.
- Advertising for new positions will include "Spanish Speaking is a plus".

Notification of Sunset Empire Transportation Title VI Obligations

SETD publicizes its Title VI program by posting its commitment to providing services without regard to race, color or national origin in all buses, schedules, on the SETD website, in the Transit Center, and on other written materials. The public notices, website, and route schedules all include the following statements:

Sunset Empire Transportation District operates its programs without regard to race, color, religion, sex, sexual orientation, gender identification, national origin, marital status, age or disability in accordance with Title VI of The Civil Rights Act, ORS Chapter 659A or other applicable law.

SETD is committed to practicing non-discrimination.

Summary of Public Participation Efforts

In accordance with Oregon public meeting law, all public meetings, including transportation planning meetings, are open to the general public. Accommodations are available for those with limited English proficiency when requested in advance of the meeting.

Public Participation Plan

A full copy of the Public Participation Plan (PPP) is included in **Attachment C**.

Purpose

The purpose of this Public Participation Plan is to establish procedures that allow for, encourage, and review the participation of all citizens in the SETD region, including but not limited to low-income, Black, Indigenous and People of Color (BIPOC) individuals, and those with limited English proficiency. While traditional means of soliciting public involvement may not reach such individuals or might not allow for meaningful avenues of input, this effort intends to take reasonable actions throughout the planning process to provide opportunities for historically underserved populations to participate.

Goals and Objectives for the Public Participation Plan

Goal: The goal of the Public Participation Plan is to offer real opportunities in person, via the internet or phone and in writing, for the engagement of all citizens of the region to participate in and provide comment on transportation making decisions.

Objectives:

- To determine what cultural barriers exist to public participation within the region.
- To provide notifications of meetings, particularly when public input is sought in a manner that is understandable to all populations in the area.
- To hold meetings in locations which are accessible and reasonably welcoming to all area residents, including, but not limited to, low-income and BIPOC members of the public.
- To provide avenues for the two-way flow of information and input from populations which are not likely to attend public meetings.
- To encourage participation of BIPOC on our Transportation Advisory Committee to assist in developing recommendations of service improvements to the Board of Commissioners.

Identification of Stakeholders

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

General Public: Some of the techniques that can be used to engage the general population are public notices of meetings in the local newspapers, local radio news media, targeted advertising, open house format public information meetings and social media.

BIPOC: Language and cultural differences may not be compatible with the more traditional means of engaging the public in the planning process. SETD will make reasonable efforts to engage BIPOC populations using techniques such as including notations in public notices in Spanish that will provide a contact where the individual can be informed of the process/project and will have the opportunity to give input. Advocacy groups can be a good source for connections and dissemination of information to BIPOC and LEP populations. Such advocacy groups or agencies can have insight into the needs of the underrepresented populations and provide valuable contacts or arenas for input. Connections with local translators and a list of resources should be maintained and used as requested and needed. SETD shall work with culturally appropriate entities to assist in recruiting BIPOC to serve on our Transportation Advisory Committee.

Low-Income: While low-income individuals may have access to all the traditional means of Public Involvement discussed under General Public, they may be less likely to become involved or offer input. Some methods of gaining input directly or indirectly from this population include focus groups, informal interviews, and agency/advocacy group contacts.

Public Agencies: Public agencies can provide valuable input to the planning process and assist in gaining participation from traditionally under-represented populations. Pertinent public agencies include those that have clients who fall into under-represented populations, including but not limited to BIPOC, low income, and LEP households. These agencies have great insight into the transportation needs of their clients. They are valuable partners in overcoming complex barriers that professionals dealing more distinctly with the provision of transportation services may not be understood.

Private Organizations and Businesses: Private organizations and businesses offer several perspectives that are valuable to the planning process. Often, transportation for employees is of critical concern to private sector employers. This is particularly true in a tourism area like Clatsop County, where many jobs are low income and seasonal. Employees often cannot afford cars, insurance, and maintenance, so they must rely on SETD's public transit system. For that reason, representation of private business interests will be welcome to participate in any planning process or other meetings that will be held. Other techniques could also be determined to be helpful at any stage of the process, and new and different methods will be utilized as deemed appropriate.

Construction Projects Undertaken:

SETD has not undertaken any construction projects during this reporting period.

Attachment A

Title VI ADA
**SUNSET EMPIRE TRANSPORTATION DISTRICT
Discrimination Complaint Form**

Section I.

Name: _____

Address: _____

Telephone (Home): _____ Telephone (Work): _____

Accessible Format Large Print Audio Tape American Sign Language
Requirements? Telecommunications Device for the Deaf Other, please explain: _____

Section II.

Are you filing this complaint on your own behalf? Yes* No
*If you answered "yes" to this question, go to Section III.

If you answered "no", please supply the name and relationship of the person for whom you are complaining: _____

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party: Yes No

Section III.

I believe the discrimination I experienced was based on (please circle all that apply)
RACE AGE NATIONAL ORIGIN COLOR OTHER

Date of alleged discrimination (Month, day, year): _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you, if known. Include the names and contact information of any witnesses. If more space is needed, please use the back of this form.

Section IV.

Have you previously filed a Title VI complaint with Sunset Empire Transportation District? Yes No

Section V.

Have you filed this complaint with any Federal, State, or Local Agency? Have you filed with any Federal or State courts?

Yes No

If yes, check all the apply:

Federal Agency: _____

State Agency:

Federal Court: _____

Local Agency:

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: _____

Title: _____

Agency: _____

Address: _____

Telephone: _____

Section VI.

Is this agency complaint regarding Sunset Empire Transportation District: Yes No

Contacted person at Sunset Empire Transportation District:

Title:

How contacted: Phone Email In person

Written materials or other information that is relevant to the complaint may be added. Signature and date are required below. Interpreter can be present or provided for any meetings. Additional meetings may be scheduled if needed.

Signature

Representative (if needed)

Date

Please submit this form in person at the address below, or mail this form to:

Sunset Empire Transportation District Attn: Executive Director
900 Marine Drive
Astoria, OR 97103

Attachment B

Discrimination Complaint Procedure

1. Any person who believes that he or she, individually, as a member of any specific class, or in connection with any disadvantaged business enterprise, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, the American with Disabilities Act of 1990, Section 504 of the Vocational Rehabilitation Act of 1973 and the Civil Rights Restoration Act of 1987, as amended, may file a complaint with SETD. A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to the Executive Director for review and action.
2. In order to have the complaint considered under this procedure, the complainant must file the complaint no later than 180 days after:
 - a) The date of alleged act of discrimination; or
 - b) Where there has been a continuing course of conduct, the date on which that conduct was discontinued.

In either case, SETD may extend the time for filing or waive the time limit in the interest of justice, as long as SETD specifies in writing the reason for so doing.

3. Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints shall set forth as fully as possible the facts and circumstances surrounding the alleged discrimination. In the event that a person makes a verbal complaint of discrimination to an officer or employee of SETD, the person shall be interviewed by the Executive Director. If necessary, the Executive Director will assist the person in reducing the complaint to writing and submit the written version of the complaint to the person for signature. The complaint shall then be processed according to SETD's Service Improvement and investigative procedures.
4. Within 10 days, the Executive Director will acknowledge receipt of the allegation, inform the complainant of action taken or proposed action to process the allegation, and advise the complainant of other avenues of redress available, such as the Oregon Department of Transportation (ODOT) and U.S. Department of Transportation (USDOT).
5. The Executive Director will advise ODOT and/or USDOT within 10 days of receipt of the allegations. Generally, the following information will be included in every notification to ODOT and/or USDOT:
 - a) Name, address, and phone number of the complainant.
 - b) Name(s) and address(es) of alleged discriminating official(s).
 - c) Basis of complaint (i.e., race, color, national origin or sex)
 - d) Date of alleged discriminatory act(s).
 - e) Date complaint was received by the recipient.
 - f) A statement of the complaint.
 - g) Other agencies (state, local or Federal) where the complaint has been filed.
 - h) An explanation of the actions SETD has taken or proposed to resolve the issue in the complaint.
6. Within 60 days, the Executive Director will conduct an investigation of the allegation and based on the information obtained, will render a recommendation for action in a report of findings to the District's Board of Directors. The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report of findings.

7. Within 90 days of receipt of the complaint, the Executive Director will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights with ODOT, or USDOT, if they are dissatisfied with the final decision rendered by SETD. The Executive Director will also provide ODOT and/or USDOT with a copy of this decision and summary of findings upon completion of the investigation.
8. Contact information for the state and federal Title VI administrative jurisdiction is as follows:

Intermodal Civil Rights Manager
Oregon Department of Transportation
3930 Fairview Industrial Drive SE, MS23
Salem, OR 97302
503-986-3619

FTA Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590



PUBLIC PARTICIPATION PLAN

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STATEMENT OF COMMITMENT

Sunset Empire Transportation District (SETD) is committed to providing an open and transparent decision-making process to which Clatsop County residents have equal access. SETD will actively solicit the involvement of citizens in the public decision-making process, through public notification, media exposure, community public meetings with comment opportunities in person, over the phone and in writing.

In addition, efforts will be made to offer early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions. This includes seeking out and considering the viewpoints of Black, Indigenous and People of Color (BIPOC), low-income, and limited English proficiency (LEP) populations as well as older adults and persons with disabilities. These actions will ensure SETD's compliance with the Federal Transit Administration (FTA) Circular 4702.1B ("Title VI Requirements and Guidelines for Federal Transit Administration Recipients").

PUBLIC INVOLVEMENT PURPOSE

The Plan shall be designed to:

- Ensure responsiveness to the level of interest and concern expressed by the public.
- Ensure visibility, transparency and understanding by the agencies, groups and individuals who may participate in the process.
- Ensure that public involvement is carefully and systematically included as part of the decision-making process.

PUBLIC INVOLVEMENT PRINCIPLES

The following principles will be used to develop and implement Public Involvement for SETD projects and programs:

- When a project (e.g., construction activity) may affect a neighborhood, special neighborhood meetings will be scheduled early in the project planning process. Notices will be sent to organized neighborhood groups and any individual who has requested notification.
- All public meeting notices shall be written in clear, concise and understandable language, and will incorporate graphics when it aids the message. The notices will clearly be identified as a SETD notice including the name and logo. The theme font will be consistent and font size will be no smaller than 14 and be printed in English and Spanish.
- The Public Involvement Process will reflect SETD's dedication to provide early and continuous opportunities for the public to be involved in the identification of the impacts of proposed decisions. It will also reflect SETD's desire to seek out the viewpoints of BIPOC, low income, and Limited English Proficiency (LEP) populations, as well as older adults and people with limited mobility.
- While in the course of conducting public outreach and involvement activities, the efforts will be consistent with SETD's Title VI Program, Executive Order 13166 on access for individuals with Limited English Proficiency, and U.S. Department of Transportation (DOT) LEP Guidance.

- Public meetings will be held in locations that are accessible to transit riders and people with disabilities and will be scheduled at times that are convenient for members of the public.
- Public meeting, special meeting and open house notices will be broadly advertised in the community in both English and Spanish (e.g., through posters onboard buses and at major transit stops and facilities, the SETD website, local print media, social media, and email notification to SETD’s outreach mailing list) including the availability of onsite language assistance and American Sign Language when requested. When appropriate, meetings may be held in an alternate language.

TARGETED PUBLIC OUTREACH

During development of the Public Involvement Plan and/or planning for public engagement in general, SETD will incorporate strategies intended to promote involvement of BIPOC and LEP individuals in public participation activities, as appropriate for the plan, project, or service in question, and consistent with federal Title VI regulations, Executive Order 13166 on Limited English Proficiency, and the U.S. Department of Transportation LEP Guidance.

At a minimum SETD staff will consider implementing the following public engagement strategies to complement the appropriate plan, project, or service:

- Use supplemental outreach strategies such as surveys and comment cards regarding SETD projects or proposed service changes.
- Partner and network with community organizations to engage members of the public who are less likely to attend traditional public meetings through means such as surveys and focus groups. SETD maintains a list of current and potential future community partners.
- Attend community events and meetings of neighborhood associations, faith-based organizations, advocacy groups, and other groups to solicit feedback from diverse members of the public.
- SETD staff may consult FTA Circular 4703.1 (“Environmental Justice Policy Guidelines for Federal Transit Administration Recipients”) for additional strategies that may be incorporated into the Public Involvement Plan.

PUBLIC COMMENT FOR FARE OR MAJOR SERVICE CHANGES

It is the commitment of SETD to solicit public opinion and consider public comment before raising fares or implementing a major service change. A public hearing is required before the implementation of a fare increase or a major service change. A “major” service change is defined as a modification that affects 15% or more of a single route or 15% or more of all routes. SETD will implement additional public involvement strategies, such as public meetings, neighborhood meetings, or other outreach to affected individuals as appropriate to solicit public comment for consideration in advance of the public forum. Public comments received will be compiled and considered before finalizing SETD’s recommendation to the Board of Commissioners regarding a fare increase or major service change. A summary of the public comments received will be provided as part of the staff report submitted to the SETD Board of Commissioners for the fare increase or major service reduction in question. The summary will be entered as public comment into the appropriate meeting minutes. Information about scheduled

public meetings is available via:

- Bus Postings- Postings at transfer points and major bus shelters
- Transit Center Postings
- SETD website
- Appropriate venues, such as senior centers, human service organizations and with community partners
- Email notification, email lists and social media

All comments received are reviewed by SETD staff and the Transportation Advisory Committee and considered in the final recommendations to the Board of Commissioners. The goal of SETD is to always provide the best possible service to current riders or potential riders.

Attachment D

Ethnicity Table

Body	Caucasian	Latinx	African American	Asian American	Native American	Other
Transportation Advisory Committee	8	1	0	0	0	0



LANGUAGE ASSISTANCE PLAN

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Introduction

This Language Assistance Plan has been prepared to address Sunset Empire Transportations Districts (SETD) responsibilities as a recipient of federal financial assistance related to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, Federal Transit Administration Circular 4702.1B, which states that no person shall be subjected to discrimination based on race, color, or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its recipients, clarifying their obligation to ensure that such discrimination does not occur. LEP persons include those individuals whose primary language is not English and who have a limited ability to speak, read, write or understand English. These persons have reported to the U.S. Census that they do not speak English well or speak English at all.

CLATSOP COUNTY 2020 Census data – reference: data.census.gov/cedsci/profile

Population	
Total Population	41,072
Population by Ethnicity	
Latinx or Latino	3,848
Non-Latinx or Latino	37,224
Population by Race	
White	33,526
African American	224
Asian	552
American Indian and Alaska Native	344
Native Hawaiian and Pacific Islander	91
Other	231
Identified by two or more	2,153
Persons 5 years and Over, Percent Speaking English less than very well	37,088 – 7.4%

Plan Summary

SETD operates local transportation services in Clatsop County. These services include fixed route transportation, ADA Paratransit transportation and Demand Response service. SETD has developed this LEP plan to help identify the reasonable steps that are needed to provide language assistance to the Limited English-speaking population of our county who wish to access our services. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available. SETD has conducted an analysis which surveyed and considered the following factors.

FOUR FACTOR ANALYSIS:

- The number or proportion of LEP persons in the service area who may be served or are likely to encounter a SETD program, activity or service. The main language identified that SETD will encounter the most frequently is Spanish.
- The frequency with which LEP individuals come in contact with the program. As a public transportation provider, it is necessary to recognize this segment of the general population. Through staff feedback and surveys, it has been concluded that Spanish-speaking LEP persons have regular contact with the service. SETD will assess the frequency at which staff has or could possibly have contact with LEP persons.

This includes examining census data, phone inquiries, requests for translated documents, and staff feedback. As a public transportation provider, it is necessary to recognize this segment of the general population. Phone inquiries and staff feedback also indicate that Spanish-speaking LEP persons have regular contact with the service.

- The nature and importance of programs, activities or services provided by SETD to the LEP population. An LEP person's inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, or education, or access to employment. All the programs that are operated by SETD will be accessible to the LEP population.
- The resources available to SETD and overall cost to provide LEP assistance. This includes identifying bilingual staff, reviewing the cost of using a translation service, determining which documents should be translated, and deciding what level of staff training is needed.

LEP ASSISTANCE

SETD has assessed the available resources that could be used for providing LEP assistance, including determining the cost of professional interpreter and translation services on a case-by-case basis. The amount of staff and vehicle operating training that could be needed was considered. SETD determines which documents would be candidates for translation and maintains contact with available organizations that SETD could partner with for outreach and translation efforts. Documents that are determined to be vital are translated into Spanish. Vital documents are defined as those documents without which a person would be unable to access services. The following are written communications that are to be available in print in Spanish:

- SETD fixed route bus schedules
- Temporary signs at bus stops and transit centers informing customers of any detours or route changes
- Reduced Fare Application
- Interior bus posters and stickers displaying safety or system information
- Fare information on fare boxes
- ADA Paratransit application and Brochure
- Onboard surveys

- Service Improvement Forms
- Title VI and ADA Discrimination Complaint Form

LANGUAGE ASSISTANCE

There are numerous language assistance measures available to LEP persons, including both oral and written language services. There are also various ways SETD staff can communicate and respond to LEP persons, whether in person, by telephone, or in writing.

- SETD will network with local human service organizations and the local Community College that provides services to LEP individuals and seek opportunities to provide information on SETD programs and services.
- SETD will place statements in notices and publications that interpreter services are available for public Board meetings, open house events, committee meetings, and budget meetings with seven-day advance notice. SETD will print route change information in Spanish.
- SETD will survey bus drivers, front-line staff, dispatchers, ADA Paratransit schedulers, and service development planners on their experience concerning any contacts with LEP persons during the previous year. These surveys will help us track trends and identify how best to make changes to meet the needs of our LEP population.
- SETD will provide language identification flashcards at the Astoria Transit Center and Seaside Transit Office.
- SETD will post the SETD Title VI Policy and LEP Plan on the agency website.
- SETD will provide group travel training to LEP persons with the assistance of bilingual volunteers.
- SETD will include language “Spanish speaking a plus” on staff and bus driver recruitment flyers and recruitment posters. Our organization will actively seek out bilingual employees.
- SETD will compile a list of volunteers for additional translation support when needed.
- SETD has acquired a third-party translation service for all public meetings held by the District.

STAFF TRAINING

The following trainings will be provided to SETD staff:

- Information on the SETD Title VI Procedures, Statements and LEP responsibilities.
- Description of language assistance services offered to the public.
- Directions on how to use the Language Identification Flashcards.
- Directions on how to use online language translators such as Google Translate
- Procedures for documentation of language assistance requests.
- How to access and use a language line service.

- How to document and handle a potential Title VI/LEP complaint.
- How to use the booklet “Basic Spanish for Transit Employees”

OUTREACH TECHNIQUES

When staff prepares a document or schedules a meeting, where the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population. Interpreters will be available as needed. SETD will keep the LEP community engaged and aware of all types of changes in schedules, fares, programs, or services. Open house events will be staffed with Spanish-speaking staff when possible.

MONITORING & UPDATING THE LEP PLAN

This plan is designed to be flexible and should be viewed as a work in progress. As such, it is important to consider whether new documents and services need to be made accessible for LEP persons, and to monitor changes in demographics and types of services, and to update the Language Assistance Plan when appropriate. At a minimum, SETD will follow the Title VI Program update schedule for the Language Assistance Plan. Each update should examine the following:

- How many LEP persons were encountered?
- Is the existing language assistance meeting the needs of LEP persons?
- What is the current LEP population in Clatsop County?
- Has that changed from the past year?
- Have available resources, such as technology, staff and finances changed?
- Were any complaints received?
- Do staff members understand the Language Assistance Plan policies and procedures?

There are several methods that can be used to assist in answering these questions. One method is to review submitted SETD’s Service Improvement Program forms to determine if there were any barriers to accessing service. Census data will also be reviewed as it becomes available to determine changes in the LEP population. Surveys of staff will assist in determining if additional measures need to be taken in the updating of the plan. These surveys will be conducted every 2 years.

DISSEMINATION OF THE LANGUAGE ASSISTANCE PLAN

A link to the SETD Language Assistance Plan and the Title VI Procedures is included on the SETD website at <https://www.nworegontransit.org/accessibility-setd/>

Any person or agency with internet access will be able to view and download the plan from the SETD website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person and will be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation, which SETD will provide within an appropriate amount of time. Questions or comments regarding the Language Assistance Plan may be submitted to the Executive Director of SETD.

Attachment: F

SUNSET EMPIRE TRANSPORTATION DISTRICT STANDARDS

SERVICE LEVEL STANDARDS

A route's hours of operation, frequency, and other service-level characteristics significantly attract riders. Passengers value convenience and reliability. Service every three hours or service that ends at 6 pm does not provide a convenient option. Service hours and frequencies significantly impact cost; however, too little investment in service levels results in empty buses.

PERFORMANCE MEASURES

SETD Displays performance measures for this category, a brief definition, where to collect the data, how SETD currently performs on the measures, and guidance on metrics for each service type. In some cases, benchmarks are the same for each service type, while in other cases, the performance measure is the same, but the metrics are different.

COST EFFICIENCY STANDARDS

Cost efficiency points to how well SETD's level of output (service hours and miles) matches against the cost to operate such service (Figure 0-2)

SERVICE EFFICIENCY STANDARDS

Transit services utilize public dollars and are responsible to operate in an efficient manner. Figure 0-3 lists metrics that speak to a system's efficient use of resources.

PASSENGER COMFORT/SAFETY STANDARDS

This set of benchmarks (Figure 0-4) is mostly already tracked by SETD and speaks to customer satisfaction beyond simply when and where service operates. The key metric not currently tracked is on-time performance or schedule adherence. Given known summer congestion problems and the problems, it causes for SETD riders, tracking on-time performance is crucial to pinpoint precisely when and how often buses are excessively late or missed trips.

PASSENGER AMENITY STANDARDS

Every transit trip involves waiting at the stop for a certain amount of time. Passenger amenity standards and benchmarks address making that wait feel as safe and comfortable as possible. To help SETD determine where to invest in stop amenities, SETD can create standards based on ridership levels. The creation of these standards will help the agency handle requests and justify actions. Based upon spring and summer ride checks, the general thresholds for high, medium, and lower ridership stops were used to create three tiers of bus stops (Figure 0-5).

Figure 0-1 Service Level Standards

Performance Measure	Definition	Data Source	SETD Performance (Route No.)	Performance Standards ¹		
				Intercity Fixed Route ²	Local Fixed Route	DAR or ADA Paratransit
Service coverage	Higher population and employment densities support higher levels of transit.	Census	Routes hit population centers with 5-59 people per acre	8-12 people or jobs per acre within ¼ mile of route in urban clusters	6-8 people or jobs per acre within ¼ mile of route	>0.5 people or jobs per acre
Minimum span of service – Weekday	Route start and end times determine how many people will use service.	Service schedules	Intercity: 6 am-10 pm Local: 6 am-7 pm	6 am-10 pm	7 am-7 pm	Same as fixed route
Minimum span of service – Weekend	Route start and end times determine how many people will use service.	Service schedules	Intercity: 8:30 am 5:30 pm (PC), 7:30 am-5:30 pm (30) Local: 6 am-6 pm (15); 9 am-6 pm (21)	8 am-8 pm	8 am-6 pm	Same as fixed route
Service frequencies – Weekday ³	Service frequency is a key characteristic for attracting riders, but also has a major impact on operating cost.	Service schedules	60 minutes (10, 20, 101); 30-220 minutes (15); 2 trips (30)	60-45 minutes	60-120 minutes	NA
Service frequencies – Weekend ³	Service frequency is a key characteristic for attracting riders, but also has a major impact on operating cost.	Service schedules	30-220 minutes (15); 3 trips (PC); 30-160 minutes (21)	60-120 minutes	60-120 minutes	NA
Vehicle loading ³	To ensure passenger comfort, agencies set standards for how many standees are acceptable on a route. On long-haul trips, it is more important to provide a seat for comfort.	Ride check or APC data	In process of installing APC.	100%	120%	NA
Service hours per capita	This metric shows how much service is provided to the community.	Rural NTD	Intercity and Local Fixed Route: 0.43 DAR/ADA: 0.1	0.45 - 0.64		0.12 - 0.28
Ridership per capita	This metric shows how much service is consumed by the community.	Rural NTD	Intercity and Local Fixed Route: 4.73 DAR/ADA: 0.17	4.73 – 8.61		0.39 - 0.61

Performance Measure	Definition	Data Source	SETD Performance (Route No.)	Performance Standards ¹		
				Intercity Fixed Route ²	Local Fixed Route	DAR or ADA Paratransit
Service Availability ³	Service availability is required in Title VI analysis, and the FTA often cites percent of population as a way of measuring availability.	Census	58.3% within a ¼ mile of transit	Set by each community. FTA does not require a certain standard but does require tracking progress.		

Figure 0-2 Cost Efficiency Standards

Performance Measure	Definition	Data Source	SETD Performance	Performance Standards ¹		
				Intercity Fixed Route ²	Local Fixed Route	DAR or ADA Paratransit
Operating cost per revenue hour	This metric is reported at system level as it is influenced by fuel, labor, insurance, and other system-wide costs.	Rural NTD; SETD annual report	\$85.37 ⁶	\$80-\$130		
Operating cost per trip	Defined as the cost to provide a specific trip, allocating operating cost on a per passenger basis.	Rural NTD; SETD annual report	Fixed-Route: \$4.74 DAR/ADA: N/A	< \$5	\$6-\$12	<\$25

Figure 0-3 Service Efficiency Standards

Performance Measure	Definition	Data Source	SETD Performance	Performance Standards ¹		
				Intercity Fixed Route ²	Local Fixed Route	DAR or ADA Paratransit
Passengers per revenue hour	The average number of passengers a bus carries for each hour in service.	Rural NTD; SETD ridership reports	Intercity and Local Fixed Route: 17.39 DAR/ADA: 1.67	16-20	6-12	2-4
Passengers per revenue mile	The average number of passengers a bus carries for each mile in service.	Rural NTD; SETD ridership reports	Intercity and Local Fixed Route: 0.78 DAR/ADA: 0.12	1.2	0.25-0.5	0.2




Stop spacing	Close stops provide more access but increase travel times. Balance the need to ensure short walking distances to and from stops with efficient travel time.	SETD GIS data	No existing standard	>1/8-1 mile	>1/8 mile	NA
Travel time ratio (bus to auto)	Provide competitive travel times to attract transit riders. If the bus travel time far outweighs driving time, those with a choice will drive.	Schedules for bus times between major destinations; Google maps for auto times	Intercity Examples: - Transit Center to Cinema: 1.6 - McDonald's Seaside to Cannon Beach: 2.3 Local Example: - Emerald Heights to Fred Meyer: 3.1	1.3	3.0	2.0-4.0
Total vehicle hours to revenue hours ratio	A high ratio of total hours to revenue hours reveals unproductive time, such as deadhead hours.	Already collected by SETD	Fixed route: 1.08 ⁴	1.2	1.3	NA
Farebox recovery ratio	This measures the percent of operating expenses covered by farebox revenue.	Rural NTD	System-Wide: 15.2%	9.9-12.3% (metric reported at system level for all agencies)		

Performance Measure	Definition	Data Source	SETD Performance	Performance Standards ¹		
				Intercity Fixed Route ²	Local Fixed Route	DAR or ADA Paratransit
Transit mode share	The % of trips taken via transit shows transit's role in achieving Transportation Planning Rule goals of reduced VMT	American Community Survey ACS 5-Year Estimates (Table S0801)	Clatsop County: 1.6% (2010-14)	Peer average: 1.26% ⁵		

Figure 0-4 Passenger Comfort and Safety Standards

Performance Measure	Definition	Data Source	SETD Performance	Performance Standards ¹		
				Intercity Fixed Route ²	Local Fixed Route	DAR or ADA Paratransit
On-Time Performance	This measures service reliability by comparing how often a vehicle leaves early or late. Most agencies set a target stating that 1-3 minutes early or 5 minutes late counts as “on time.”	Ride check	NA	80-95%		90-96%
Passenger complaints	Track complaints to gauge customer satisfaction.	SETD reports	17 driver or system complaints per 100,000 boardings ⁷	No more than 25 legitimate complaints per 100,000 boardings		
Road calls / maintenance	Road calls are the number of times a vehicle must be taken out of service.	SETD reports	NA	No more than 10 per 100,000 revenue miles.		
Safety	Bus accidents disrupt service and indicate operator training needs or street design problems.	SETD reports	1.3 Safety Issues or Incident Reports per 100,000 revenue miles ⁷	No more than: 1 preventable accident per 100,000 miles; 2 accidents per 100,000 revenue miles; 2 major accidents per 1,000,000 revenue miles		
No show / late cancellation rate	This tracks the percent of scheduled trips where the passenger is a no-show or failed to provide adequate notice to cancel a trip. It indicates unproductive vehicle time.	SETD reports	27% no-show or cancellation for ADA, DAR, March 2015-Feb 2016 ⁴	NA	NA	No-Show / cancellations > 5%
Trip denials	Trip denials show capacity to provide requested rides within 1 hour of the time requested by the passenger. No ADA trips should be denied.	SETD reports	Data Incomplete ⁴	NA	NA	No patterns of denied service allowed per ADA

Figure 0-5 Amenity Standards and Benchmarks

	Tier 1: Basic Bus Stop	Tier 2: Major Bus Stop with Shelter	Tier 3: Enhanced Bus Stop
Examples of Uses	Typical stop with a concrete pad, route sign, map/schedule, and information in Braille	High Use Stops, Transfer Point	Transit Centers, Highest ridership location, Park-and-Ride
Example Location	Geno's, Crest Motel	Midtown Cannon Beach; Rainier; Sunset Beach; Emerald Heights; Tongue Point	Transit Center in Astoria; Seaside Cinema; Fred Meyer hub; Clatsop Community College
Ridership	Low = <10 Daily Boardings	Medium = 10-25 Daily Boardings	High = >25 Daily Boardings
Required / Preferred Elements ¹	Concrete landing pad Route sign Schedule Lighting Continuous pedestrian access Well-maintained pull-off location (if stop is a pull-off)	Concrete landing pad Route sign Schedule Lighting Continuous pedestrian access Well-maintained pull-off location (if stop is a pull-off) Shelter / seating	Concrete landing pad Route sign System map / Schedule Lighting Continuous pedestrian access Well-maintained pull-off location (if stop is a pull-off) High-capacity shelter(s) Trash can Designated park and ride spaces
Optional Elements	System map / schedules Bench	System map / schedules Secure bicycle parking Trash can	Real-time information Secure bicycle parking Placemaking / art Solar shelters Solar lighting
Photo Examples			

Notes for all tables:

¹ Standards are preliminary thresholds of acceptable performance based on peer systems and industry norms.

² Includes main intercity routes such as Connector routes or Route 101.

³ Represents a Title VI required measure (system-wide service standard per FTA Circular 4702.1B). FTA does not prescribe the benchmark itself, but the tracking of such metrics.

⁴ Data source: March 2015-February 2016, provided by SETD

⁵ Peer ACS data: Redwood (Del Norte Co, CA): 0.8%; Columbia Co, WA: 0.9%; Lincoln Co, OR: 1.7%; Tillamook Co, OR: 0.9%; Grays Harbor Co, WA: 1.7%; Jefferson Co, WA: 1.9%; Pacific Co, WA: 0.6%

⁶Based on Rural National Transit Database Reporting, for all services (Fixed-route plus demand-response).

⁷Data source: March 2015-February 2016.