

# *Title VI Implementation Plan*

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**November 24, 2015**



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# Title VI Policy Statement

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The City of Glendale Transit policy assures full compliance with Title VI of the Civil Rights act of 1964, the Restoration Act of 1987, section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 (ADA), and related statutes and regulations in all programs and activities. Title VI states that “no person shall on the grounds of race, color, national origin, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination” under any City of Glendale Transit sponsored program or activity. There is no distinction between the sources of funding.

City of Glendale Transit also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies and activities on minority and low-income populations. Furthermore, City of Glendale will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

As a sub-recipient of Federal-aid funds from another entity/person, City of Glendale Transit will ensure full compliance with Title VI Nondiscrimination Program requirements. Glendale Transit will oversee and implement FTA Title VI requirements.

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Richard A. Bowers, Acting City Manager

# Title VI Notice to the Public

## Notifying the Public of Rights Under Title VI City of Glendale Transit

The City of Glendale Transit operates its programs and services without regard to race, color, national origin or disability in accordance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA). Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Glendale's transit services contractor, Valley Metro Customer Service Care center.

For more information on the City of Glendale's civil rights program, and the procedures to file a complaint, contact 602-253-5000, (TTY 602-251-2039); email [csr@valleymetro.org](mailto:csr@valleymetro.org); or visit the administrative office at 4600 E. Washington St., Suite 101, Phoenix, AZ 85034. For more information, visit [www.ValleyMetro.org](http://www.ValleyMetro.org)

A complainant may file a complaint directly with the City of Phoenix Public Transit Department or the Federal Transit Administration (FTA) by filing a complaint directly with the corresponding offices of Civil Rights: **City of Phoenix Public Transit Department:** ATTN: Kristy Ruiz, Title VI/ADA Coordinator, 302 N. 1<sup>st</sup> Ave., Suite 900, Phoenix AZ 85003 **FTA:** ATTN: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590

If information is needed in another language, contact Valley Metro at 602-253-5000. Para información en Español llame a: Kristy Ruiz, Title VI/ADA Coordinator, City of Phoenix, 602-495-0579 or [kristy.ruiz@phoenix.gov](mailto:kristy.ruiz@phoenix.gov)

*The above notice is posted in the following locations: City of Glendale Transit, 6210 W. Myrtle Ave., Building S., Glendale, AZ 85301 and City of Glendale Transportation Administration, 6210 W. Myrtle Ave., Suite 112, Glendale, AZ 85301*

*This notice is posted online at [www.GlendaleAZ.com/Transit](http://www.GlendaleAZ.com/Transit)*

## **Title VI Notice to the Public -Spanish**

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### **Aviso al Público Sobre los Derechos Bajo el Título VI La Ciudad de Glendale**

La Ciudad de Glendale (*y sus subcontratistas, si cualquiera*) asegura cumplir con el Título VI de la Ley de los Derechos Civiles de 1964, Sección 504 de la Ley de Rehabilitación de 1973 y La Ley de ciudadanos Americanos con Discapacidades de 1990 (ADA). El nivel y la calidad de servicios de transporte serán proveídos sin consideración a su raza, color, o país de origen.

Para obtener más información sobre el programa de derechos civiles de la Ciudad de Glendale y los procedimientos para presentar una queja, contacte Servicio al Cliente de Valley Metro, 602-253-5000, (TTY 602-251-2039); o visite la oficina administrativa en 4600 E. Washington, St. Suite 101. Para obtener más información, visite [www.ValleyMetro.org](http://www.ValleyMetro.org)

También se puede presentar una queja directamente con el departamento de Transporte Público de la Municipalidad de Phoenix o Administración Federal de Tránsito (FTA) mediante la presentación de una queja directamente con las oficinas correspondientes de Civil Rights: City of Phoenix Public Transit Department: ATTN: Kristy Ruiz, Title VI/ADA Coordinator 302 N. 1<sup>st</sup> Ave., Suite 900, Phoenix AZ 85003 FTA: ATTN Title VI Program Coordinator, East Building, 5th Floor – TCR 1200 New Jersey Ave., SE Washington DC 20590

*The above notice is posted in the following locations: City of Glendale Transit, 6210 W. Myrtle Ave., Building S., Glendale, AZ 85301 and City of Glendale Transportation Administration, 6210 W. Myrtle Ave., Suite 112, Glendale, AZ 85301*

*This notice is posted online at [www.GlendaleAZ.com/Transit](http://www.GlendaleAZ.com/Transit)*

# Title VI Complaint Procedures

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The City of Glendale contracts with City of Phoenix and Valley Metro to provide fixed route transit service in Glendale. Glendale Transit directly operates and provides Dial-A-Ride (ADA and demand) along with circulator (GUS bus) service in Glendale. The City, along with the rest of the region, relies on Valley Metro customer service to process and investigate Title VI complaints for fixed route service. Glendale Transit staff investigates Title VI complaints for dial-a-ride and GUS bus services after they have been processed by Valley Metro. Glendale Dial-A-Ride and GUS bus services operated by the City have not received any Title VI complaints since 2012. See below for the Valley Metro Title VI Complaint Procedures used by all service providers to investigate these complaints.

## TITLE VI COMPLAINT PROCEDURES

Any person who believes she or he have been discriminated against on the basis of race, color, or national origin by Valley Metro or our transit service provider may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form[1] or by calling Valley Metro's Customer Service. All complaints are logged into Valley Metro's Customer Assistance System (CAS) and will be investigated according to federal standards.

Valley Metro's Title VI Complaint Form (English and Spanish) is located on our website: ([http://www.valleymetro.org/about\\_valleymetro/civil\\_rights\\_policy\\_statement](http://www.valleymetro.org/about_valleymetro/civil_rights_policy_statement)). The form is available in both English and Spanish. Complaints can also be filed by contacting Valley Metro's Customer Service at:

Email: [csr@valleymetro.org](mailto:csr@valleymetro.org)

Phone: (602) 253-5000

TTY: (602) 251-2039

Valley Metro has 30 days to investigate each complaint. If more information is needed to resolve the case, Valley Metro may contact the complainant. Following the investigation of the complaint, a possibility of two letters will be sent to the complainant: a closure letter or a letter of finding. A closure letter states that there was not a Title VI violation; therefore, the case will be closed. A letter of finding states that there was a Title VI violation and explains what corrective action will be taken to remedy the situation. A complainant can appeal the decision within 60 days of receiving the letter. All appeals must be submitted to Valley Metro Customer Service.

## PROCEDURES FOR TRACKING AND INVESTIGATING TITLE VI COMPLAINTS

### **TRACKING**

- Complaint comes in and is logged into the CAS system.
- The Customer Service Administrator sends the complaint to the cities/transit provider for investigation and documentation within 24 hours.
- Complaint is returned to the Customer Service Administrator to ensure the information is complete and closes the complaint.
- Each cities administrator audits the complaints as well to ensure they meet the guidelines for Title VI.
- The administrator reviews an outstanding weekly report identifying outstanding complaints. During the review process the administrator will send out notifications to the agency and a copy to the relevant city to remind the entity that the complaint is not yet resolved or closed out. This process is reinitiated each week to ensure timely compliance.
- The administrator audits all completed Title VI complaints to check for accuracy and will have complaint reopened by Customer Service administrator and sent back if not completed accurately.

### **INVESTIGATING**

Each documented Title VI investigative report must address each of the “Seven Federal Investigative” steps found in 28 CFR, Part 35 and FTA Circular 4702.IA. The seven steps are as follows:

#### **STEP ONE:** Summary of the complaint

- Completed by the Regional Services Customer Relations staff

#### **STEP TWO:** Statement of issues

- List every issue derived from the complaint summary
- Include questions raised by each issue
  - Who?
  - What?
  - When?
  - Where?
  - How?
- Add new issues that surface during investigation
- Final list of issues becomes outline for investigation

**STEP THREE:** Respondent's **reply** to each issue

- Obtain information from each respondent, listen to each tape, and review each document
- All staff will document information collected in the customer contact (respondent area).
- After all respondent information is documented
  - Complete the documentation (remaining steps)
  - Determine the action taken
  - Follow up with the customer.

Note: "Respondent" is not confined to the transit vehicle operator. "Respondent" is defined as **any** source of information that can contribute to the investigation, such as:

- Operator (Interview / History)
- Radio/Dispatch/OCC reports
- GPS tracking software & programs
- Maintenance (Staff / Records)
- City Transit staff
- Witnesses
- Complainant (Interview / History)
- Spotter reports
- Video (camera) and/or audio recordings
- Courtesy cards
- Incident reports (supervisor, transit police, fare/security inspectors)
- Other transit employees
- Route history

**STEP FOUR:** Findings of fact

- Investigate every "issue" (stated in the "statement of issues noted in step two)
- Separate facts from opinions

**STEP FIVE:** Citations of pertinent regulations and rules

- Develop list of all regulations, rules, policies, and procedures that apply to the investigation
  - Title VI requirements
  - Company rules & procedures
  - Valley Metro policies & service standards

**STEP SIX:** Conclusions of law

- Compare each fact from "findings of fact" to the list of regulations, rules, etc.
- Make decision on whether violation(s) occurred
- List of violations becomes "conclusions of law"



**STEP SEVEN:** Description of remedy for each violation

- Specific corrective actions for each violation found
- Include plans for follow-up checks
- Do not conclude report with “no action taken”
- If no violations found, conclude the report in a positive manner
  - Review of policies & procedures
  - Review of Title VI provisions

**Response to Customer:**

- Detailed summary of conversation with customer
- Copy of letter to customer

**Action Taken:**

- Must include specific corrective action for each violation found
- Include a follow-up action plan
- If no violations found, note policies, procedures, etc. reviewed with operator
- Never state “no action taken”
- Documented information should always include initials & dates

## Title VI Complaint Form (English)

### TITLE VI COMPLAINT FORM

Any person who believes that he or she has been discriminated against by Valley Metro or any of its service providers, and believes the discrimination was based upon race, color or national origin may file a formal complaint with Valley Metro Customer Service.

Please provide the following information to process your complaint. Alternative formats and languages are available upon request. You can reach Customer Service at (602) 253-5000; TTY: (602) 251-2039, or email at [cs@valleymetro.org](mailto:cs@valleymetro.org).

#### Section I: Customer Information

Name:		
Address:		
City:	State:	Zip:
Work Phone:	Home Phone:	Cell Phone:
Email Address:		

#### Section II: Incident Information

Date of Incident:	Time of Incident:	AM/PM	City:
Incident Location:		Direction of Travel:	
Route #:	Bus/Light Rail #:		
Service Type: <input type="checkbox"/> Local <input type="checkbox"/> LINK <input type="checkbox"/> Express/RAPID <input type="checkbox"/> Light Rail <input type="checkbox"/> Circulator/Connector <input type="checkbox"/> Dial-a-Ride			
Operator Name:			
Operator Description:			

What was the discrimination based on? (Check all that apply)

☐ Race ☐ Color ☐ National Origin ☐ Limited English Proficiency ☐ Other:

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), as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

Have you filed this complaint with the Federal Transit Administration? <input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please provide information about a contact person at the Federal Transit Administration where the complaint was filed.	
Name:	Title:
Address:	Telephone:
Have you previously filed a Title VI complaint with this agency? <input type="checkbox"/> Yes <input type="checkbox"/> No	

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

Signature \_\_\_\_\_ Date \_\_\_\_\_

602.253.5000  
TTY: 602.251.2039  
[valleymetro.org](http://valleymetro.org)



## Title VI Complaint Form (Spanish)

### FORMA DE QUEJAS DEL TITULO VI

Cualquier persona que crea que ha sido discriminada basándose en su raza, color u origen nacional por Valley Metro o sus proveedores de servicio puede registrar una queja del Título VI con el Servicio al Cliente de Valley Metro.

Por favor provea la siguiente información necesaria para que se procese su queja. Hay formatos e idiomas alternos disponibles si se solicitan. Llene esta forma y envíela por correo postal a o entreguela en: Regional Public Transportation Authority, 4600 E. Washington St., Suite 101, Phoenix, Arizona 85034. Usted puede comunicarse con el Servicio al Cliente llamando al (602) 253-5000/TTY: (602) 251-2039, ó por correo electrónico en [csr@valleymetro.org](mailto:csr@valleymetro.org).

<b>Sección I: Información del Cliente</b>			
Nombre:			
Domicilio:			
Ciudad:	Estado:	Código Postal:	
Teléfono del Trabajo:	Teléfono del Hogar:	Teléfono Celular:	
Domicilio Electrónico:			
<b>Sección II: Información del Incidente</b>			
Fecha del Incidente:	Hora del Incidente:	AM/PM	Ciudad:
Ubicación del Incidente:		Dirección de Viaje:	
# de Ruta:	# de Autobús/Tren Ligero:		
Tipo de Servicio: <input type="checkbox"/> Local <input type="checkbox"/> LINK <input type="checkbox"/> Express/RAPID <input type="checkbox"/> Tren Ligero <input type="checkbox"/> Circulador/Connector <input type="checkbox"/> Dial-a-Ride			
Nombre del/la Conductor/a:			
Descripción del/la Conductor/a:			
¿En qué se basó la discriminación? (Marque todo lo que sea aplicable)			
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen Nacional <input type="checkbox"/> Dominio Limitado del Inglés <input type="checkbox"/> Otro			
Explique tan claramente como sea posible lo que sucedió y por qué cree usted que se le discriminó. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la/s persona/s que le discriminó/arón a usted (si los sabe), así como los nombres y la información de contacto de cualquier testigo. Si necesita más espacio, por favor use el reverso de esta forma.			

¿Ha usted registrado esta queja con la Administración Federal de Tránsito? <input type="checkbox"/> Sí <input type="checkbox"/> No	
Si contestó sí, por favor provea información sobre la persona de contacto en la Administración Federal de Tránsito donde se registró la queja.	
Nombre:	Título:
Domicilio:	Teléfono:
¿Ha usted registrado previamente una queja del Título VI con esta agencia? <input type="checkbox"/> Sí <input type="checkbox"/> No	
Usted puede adjuntar cualquier material por escrito o cualquier otra información que crea que sea relevante a su queja.	
Se requieren la firma y la fecha abajo:	
Firma	Fecha

valleymetro.org  
602 253 5000  
TTY 602 251 2039



# Title VI Investigations, Complaints, and Lawsuits

This form will be submitted annually. If no investigations, lawsuits, or complaints were filed, a blank form will be submitted.

Description/Name	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, national origin or disability)	Status	Action(s) Taken (Final findings?)
<b>Investigations</b>				
1)				
2)				
<b>Lawsuits</b>				
1)				
2)				
<b>Complaints</b>				
1)				
2)				

☐ City of Glendale Transit will investigate any Title VI complaints, investigations, or lawsuits related to Glendale Urban Shuttle (GUS Bus) and Glendale Dial-A-Ride and has not had any since 2012.

The City of Phoenix operates the City of Glendale's local service and Valley Metro operates the City of Glendale's express service, and both have reported the City of Glendale's complaints in their Title VI Programs.

ROUTES UNDER CONTRACT WITH THE CITY OF PHOENIX		ROUTES UNDER CONTRACT WITH VALLEY METRO
Route 51	Route 80	Express 573
Route 59	Route 90	Express 575
Route 67	Route 138	Grand Avenue Limited (GAL)
Route 60	Route 170	Route 106
	Route 186	Route 70

## Title VI Public Participation Plan

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# *City of Glendale Transit*

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# *Public Participation Plan*

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City of Glendale Transit is engaging the public in its planning and decision-making processes, as well as its marketing and outreach activities. The public will be invited to participate in the process whether through public meetings or surveys. As an agency receiving federal financial assistance, City of Glendale Transit made the following community outreach efforts:

City of Glendale Transit has adopted the City of Phoenix / Valley Metro Title VI Public Participation Plan. **(Attachment "A")**

In addition to the service change public meetings conducted by Valley Metro and the City of Phoenix, the City of Glendale has conducted the following public participation events.

EVENT	DATE
Citizens Transportation Oversight Commission (CTOC)	First Thursday of each month
Glendale Onboard (GO) Open House Meeting	April 25, 2012
North Glendale Park & Ride/Transit Center	October 17, 2012
North Glendale Park & Ride/Transit Center	March 12, 2013
Glendale Onboard (GO) Open House Meeting	April 24, 2013
Glendale Onboard (GO) Open House Meeting	April 23, 2014
Arrowhead Transit Center Presentation	September 25, 2015
Accepting input on concepts for the Arrowhead Transit Center and Park & Ride locations	Through October 3, 2015
The City of Glendale is in the process of updating the Transportation Plan and every effort is being made for public participation through public meetings and input via the city's web site.	2015 – 2016

#### **Public Meetings:**

- (1) Public meetings are scheduled to increase the opportunity for attendance by stakeholders and the general public. This may require scheduling meetings during non-traditional business hours, holding more than one meeting at different times of the day or on different days, and checking other community activities to avoid conflicts.
- (2) When a public meeting or public hearing is focused on a planning study or program related to a specific geographic area or jurisdiction within the region, the meeting or hearing is held within that geographic area or jurisdiction.
- (3) Public meetings are held in locations accessible to people with disabilities and are located near a transit route when possible.

City of Glendale Transit submits to the City of Phoenix annually an application for funding. Part of the annual application is a public notice, which includes a 30-day public comment period which is conducted by Maricopa Association of Governments (MAG) on behalf of all applicants for all regional transit grant funding efforts.

## Title VI Language Assistance Plan

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# *City of Glendale Transit*

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## *Language Assistance Plan*

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City of Glendale Transit has adopted the City of Phoenix's Language Assistance Plan (**Attachment "B"**) to help identify reasonable steps to provide language assistance for Limited English Proficiency (LEP) persons seeking meaningful access to City of Glendale Transit services as required by Executive Order 13166. A LEP person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

The plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training to staff, notification to LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining the City of Glendale's extent of obligation to provide LEP services, the City of Phoenix undertook a U.S. Department of Transportation four-factor LEP analysis which considers the following:

- 1) The number or proportion of LEP persons eligible in the City of Glendale Transit service area who may be served or likely to encounter by City of Glendale Transit program, activities, or services;
- 2) The frequency with which LEP individuals come in contact with any City of Glendale Transit services;
- 3) The nature and importance of the program, activities or services provided by the City of Glendale Transit to the LEP population; and
- 4) The resources available to City of Glendale Transit and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

A statement in Spanish will be included in all public outreach notices. Every effort will be made to provide vital information to LEP individuals in the language requested. All public outreach notices will include the statement indicating that LEP individuals may contact Valley Metro at 602-253-5000, (TTY 602-251-2039); email [csr@valleymetro.org](mailto:csr@valleymetro.org) or visit the administrative office at 4600 E. Washington St., Suite 101 Phoenix, AZ 85034 to receive the information in an alternate language.

#### **Safe Harbor Provision**

City of Glendale Transit complies with the Safe Harbor Provision, as evidenced by the number of documents available in the Spanish language. With respect to Title VI information, the following shall be made available in Spanish:

- (1) Title VI Notice
- (2) Complaint Procedures
- (3) Complaint Form



In addition, we will conduct our marketing (including using translated materials) in a manner that reaches each LEP group. Vital Documents include the following:

- (1) Notices of free language assistance for persons with LEP
- (2) Notice of Non-Discrimination and Reasonable Accommodation
- (3) Outreach Materials
- (4) Bus Schedules
- (5) Route Changes
- (6) Public Hearings

# Non-elected Committees Membership Table

A sub-recipient who selects the membership of transit-related, non-elected planning boards, advisory councils, or committees must provide a table depicting the membership of those organizations broken down by race. Subrecipients also must include a description of the efforts made to encourage participation of minorities on these boards, councils, and committees.

**Table Depicting Membership of Committees, Councils, Broken Down by Race**

Body	Caucasian	Latino	African American	Asian American	Native American
Population	67.8%	35.5%	6.0%	3.9%	1.7%
Citizens Transportation Oversight Commission (CTOC)	100%	0%	0%	0%	0%

The Glendale City Council appoints Boards and Commission members to serve on the Citizens Transportation Oversight Commission (CTOC). The CTOC consists of 11 members who are Glendale residents: 6 are appointed by each Councilmember and 1 is a Mayoral appointee. The remaining 4 are appointed at large by any member of the Glendale City Council. A three-hour basic training program is required for those who have expressed a desire to serve and who have completed an application. Once training is completed, their application is considered as vacancies occur.

The City of Glendale will continue to make every effort to encourage participation of minorities on CTOC through increased outreach by advertising vacant positions in media outlets that reach the minority population.

Additionally, the City Charter requires that redistricting be done at least every ten years following the U.S. Census. Any changes to voting districts are required to be approved by the United States Department of Justice.

# Title VI Equity Analysis

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A subrecipient planning to acquire land to construct certain types of facilities must not discriminate on the basis of race, color, or national origin, against persons who may, as a result of the construction, be displaced from their homes or businesses. “Facilities” in this context does not include transit stations or bus shelters, but instead refers to storage facilities, maintenance facilities, and operation centers.

There are many steps involved in the planning process prior to the actual construction of a facility. It is during these planning phases that attention needs to be paid to equity and non-discrimination through equity analysis. The Title VI Equity Analysis must be done before the selection of the preferred site.

***Note: Even if facility construction is financed with non-FTA funds, if the subrecipient organization receives any FTA dollars, it must comply with this requirement.***

National Environmental Policy Act (NEPA) Categorical Exclusion was completed, submitted and approved in 2014 (**Attachment “C”**) as part of the Title VI Equity Analysis for the construction of the Arrowhead Transit Center scheduled to open November 2015.

## A. Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Per 49 CFR 21.9(b)(3), recipients may not select the site or location of facilities with the purpose or effect of excluding persons from, denying the benefits of, or subjecting them to discrimination on the basis of race, color, or national origin. Additionally, the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.

This document is an analysis of the City of Glendale’s planned Transit Center to be completed December 2014.

## B. Background

The Arrowhead Transit Center will include new passenger amenities, including shaded bus shelters, free wi-fi, electrical outlets for phone chargers, bus pullouts and landscaping. The current location has no dedicated passenger amenities.

## C. Analysis

For facilities covered by this provision, recipients are required to:

- 1) Complete a Title VI equity analysis during the planning state with regard to where an agency is located to ensure the location is selected without regard to race, color, or national origin, and engage in outreach to persons potentially impacted by siting of facilities. The Title VI equity analysis

must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.

2) Give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure proper analysis of localized impacts.

3) Provide substantial legitimate justification for locating an agency in a location that will result in a disparate impact on the basis of race, color, or national origin, and show that there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. In order to show that both tests have been met, the recipient must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

# Title VI Fixed Route Transit Provider Analysis

**Fixed route:** Public transit service (other than by aircraft) provided on a repetitive, fixed-schedule basis along a specific route, with vehicles stopping to pick up passengers.

A subrecipient providing fixed route service, as defined above, must determine the distribution of transit amenities or the vehicle assignments for each mode in a non-discriminatory manner. The subrecipient must develop policies to ensure service is not distributed on the basis of race, color, or national origin.

Effective practices to fulfill the Service Standards requirements include developing written policies covering each of the following service indicators:

## **1) Vehicle Load for Each Mode**

### **1.1 Vehicle Load Standard**

Vehicle load (also known as maximum load) is the ratio of the number of passengers on a vehicle to the number of seats. The City of Glendale directly operates 3 circulator routes contracting out other fixed routes with the City of Phoenix.

The load thresholds are identified below:

Two different configurations are used;

On Route 1 the buses can seat up to 33 passengers and hold comfortably 47 passengers with an expressed ratio of 1.42. This means that all seats are filled and there are 14 standees.

On Routes 2 and 3 the buses can seat up to 19 passengers and hold comfortably 27 passengers with an expressed ratio of 1.42. This means that all seats are filled and there are 8 standees.

### **1.2 Vehicle Load Data Collection**

To determine the vehicle load the following data is gathered:

- Annual random ride check samples or APC data
- Each ride check is one trip on a route
- AM Peak direction samples Monday through Friday
- PM Peak direction samples Monday through Friday
- Samples collected annually throughout the year

### **1.3 Vehicle Load Assessment**

Using the data above the following analysis is done to determine the vehicle load:

#### **Community Circulator Service**

- Determine number of minority and non-minority routes that have a max load ratio of less than 1.0 for AM and PM Non-Peak times – calculate percentage
- Determine number of minority and non-minority routes that have a max load ratio of less than 1.40 for AM and PM Peak times – calculate percentage
- Repeat the calculations for low-income and non-low-income routes

- Compare level of service between minority and non-minority routes and low income and non-low-income routes

## **2) Vehicle Headway for Each Mode**

Vehicle headway standards are based on the Transit Standards and Performance Measures (TSPM) for regionally funded routes. Transit service standards and performance measures represent rules and guidelines by which the performance of the region's transit system may be evaluated, and decisions regarding transit investments may be prioritized and measured.

### **2.1 Vehicle Headway Standard**

Vehicle headway is the time interval between two vehicles traveling in the same direction on the same route. The following are the vehicle headway standards for the City of Glendale's Circulators

<b>Service Type</b>	<b>Minimum Headway or Daily Trips</b>	<b>Minimum Span Week / Sat / Sun</b>	<b>Minimum</b>
Circulator 1	30 min	11 hrs. / 11 hrs. / 10 hrs.	Mon - Sun
Circulator 2	30 min	9 hrs. / 0 / 0	Mon – Fri
Circulator 3	60 min	9 hrs. / 0 / 0	Mon - Fri

## **3) On Time Performance for Each Mode**

### **3.1 On Time Performance Standard**

On time performance is a measure of bus runs for a particular route completed as scheduled. The service standard threshold is defined as 90% or better of all trips on a particular route completed within the allowed on-time window (no more than 0 minutes early and 5 minutes 59 seconds late, compared to scheduled arrival/departure times as published time points).

### **3.2 On Time Performance Data Collection**

Measure standard using Valley Metro operated local fixed routes.

## **4) Service Availability for Each Mode**

Transit amenities are locally funded and fall under the responsibility of the jurisdictions within which they are sited. The service availability and service availability assessments will be the responsibility of the individual municipalities.

### **4.1 Service Availability Standard**

Service availability is measured by the distribution of bus stops within the regional service area that affords residents accessibility to transit. The service standard is consistent with the TSPM standard and has the following thresholds for each service.

## Community Circulator Service

- Bus stops within the designated stop area of each circulator route are placed no more than one-quarter mile apart

### 4.2 Service Availability Data collection

- Bus stop database

Effective qualitative practices to fulfill the Service Policy requirements include developing written policies covering each of the following service indicators:

#### 1) *Transit amenities for each mode*

Bus stop furniture such as bus shelters, benches and trash receptacles are placed at high ridership areas. Ridership is determined by the amount of passengers boarding and disembarking at bus stops along the route.

#### 2) *Vehicle assignments for each mode*

Vehicle assignments are determined by the amount of ridership per run. Per run indicates the amount of passengers boarding the circulator within one complete trip. Starting at point "A" completing one circuit, returning to point "A".

# **Title VI Implementation Plan Attachment “A”**

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## **PUBLIC PARTICIPATION PLAN**



## VALLEY METRO PUBLIC PARTICIPATION PLAN

### Introduction

The regional transit public input/outreach process is conducted by Valley Metro for various transit-related activities and actions. Throughout the year, Valley Metro conducts public outreach activities related to capital projects, transit service changes, fare changes, and other transit-related events. This Title VI Public Participation Plan was established to ensure adequate inclusion of the public throughout the Phoenix metropolitan community in accord with the content and considerations of Title VI of the Civil Rights Act of 1964. Federal regulations state that recipients of federal funding must “promote full and fair participation in public transportation decision-making without regard to race, color or national origin.” Valley Metro uses this Plan to ensure adequate involvement of low-income, minority and limited English proficient (LEP) populations, following guidance from the Title VI Requirements and Guidelines for Federal Transit Administration Recipients Circular<sup>3</sup> (Circular).

Involving the general public in Valley Metro practices and decision-making processes provides helpful information to improve the transit system and better meet the needs of the community. Although public participation methods and extent may vary with the type of plan, program and/or service under consideration as well as the resources available, a concerted effort to involve all affected parties will be conducted in compliance with this Plan along with Federal regulations. To include effective strategies for engaging low-income, minority and LEP populations, the Circular suggests that the following may be considered:

- Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities.
- Employing different meeting sizes and formats.
- Coordinating with community- and faith-based organizations, educational institutions and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.
- Considering radio, television, or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations could also include audio programming available on podcasts.

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<sup>3</sup> United States Department of Transportation, Federal Transit Administration, Circular 4702.1B.

- Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.

Valley Metro currently practices all of these strategies, in compliance with Federal regulations, so that minority, low-income and LEP populations are informed and also have meaningful opportunities to engage in planning activities and provide input as part of the decision-making process.

### **Typical Public Participation Opportunities**

Valley Metro provides opportunities to share information or receive public input through a variety of methods for public participation utilized to engage low-income, minority and LEP populations through many outlets.

For planning efforts, including fare and service changes, public meeting locations are held at a centralized area or near affected route areas and bilingual staff is available. Public notices and announcements are published in minority-focused publications; some examples include: the *Arizona Informant* (African American community), *Asian American Times* (Asian American community), *La Voz* and *Prensa Hispana* (Hispanic community). Press releases are also sent to these media sources regarding fare changes, service changes and other programs. Additionally, printed materials, including comment cards or surveys, are available in Spanish.

A key participation effort, the Rider Satisfaction Survey, is conducted every two years. This survey is administered on transit routes across the region, reaching transit riders that live in minority and/or low-income communities. The survey, administered in English and Spanish, measures citizen satisfaction with transit services and captures comments for improvements.

Throughout the year, minority, low-income and LEP populations have access to information via the Valley Metro Customer Service Center. The Customer Service Center is open 6 a.m. to 8 p.m., Monday through Friday; 7 a.m. to 7 p.m. on Saturdays; and 8 a.m. to 5 p.m. on Sundays and designated holidays. Customer Service staff is bilingual.

Also available is the website [www.valleymetro.org](http://www.valleymetro.org). Most information including meeting announcements, meeting materials and other program information is available on the website in both English and Spanish. If users would like information in another language, Valley Metro features Google translate on its website. This allows Valley Metro to reach citizens in 91 languages with information on transportation services, proposed service changes and other programs.

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## Public Participation Methods

Valley Metro uses several specific public involvement techniques to ensure that minority, low-income and LEP persons are involved in transit decisions. Through the use of public involvement, media outlets and printed or electronic materials, Valley Metro disseminates information regarding planning efforts. These efforts include the activities described below.

- Public meetings, hearings and open houses are held regularly at community-familiar locations with public transportation access and at convenient times, in collaboration with our member cities. These meetings provide an opportunity to meet with citizens and receive their comments and questions on proposed service changes and other programs. For each program, Valley Metro varies its meeting format in order to best engage the targeted population.
- Valley Metro has staff available at public meetings, hearings, events and open houses to answer questions and receive comments in both English and Spanish. Valley Metro also utilizes court reporters to record verbal comments at public hearings.
- Outreach for biannual service changes and other programs are conducted at or near the affected area, for example, along an affected bus route or at an affected transfer location, thus targeting the population that may be most impacted by proposed changes to service or routes. Oftentimes, these efforts are also executed at transit stations, community centers, civic centers, or major transfer locations.
- Coordination with community- and faith-based organizations, educational institutions and other organizations occurs regularly. These coordination efforts assist Valley Metro in executing public engagement strategies that reach out to members of the population that may be impacted.
- Valley Metro conducts specially-tailored transit presentations to community groups. This includes mobility training for senior citizens and people with disabilities, as well as information on how to use the transit system for new residents and refugees. More comprehensive travel training is also conducted monthly at a regional center for customers with disabilities.
- All public meeting notices for biannual service changes and other programs are translated to Spanish. Notices regarding Valley Metro projects and programs are widely distributed to the public through multiple methods, including through community- and faith-based organizations as well as via door hangers, direct mail, newspaper advertisement, electronic messaging (email through existing database), social media, door-to-door canvassing and on-board announcements on the transit system.

- Valley Metro publishes advertisements of any proposed service or fare change in minority publications in an effort to make this information more easily available to minority populations. Additionally, Valley Metro sends press releases regarding service changes and other programs to Spanish-language media.
- Valley Metro offers online participation via social media and e-mail input as an alternative opportunity for comment.
- Major surveying efforts are conducted in both English and Spanish to ensure that the data collected is representative of the general public.
- Valley Metro Customer Service staff is multilingual.
- All comments are documented in a centralized database. For biannual service changes, comments are categorized as “in favor,” “not in favor” or “indifferent.” Comment summary information is provided to Valley Metro’s city partners for review and is also presented to the Valley Metro Board for consideration when taking action on proposed service changes.

Depending upon the type of project, program, or announcement, public participation methods may be customized to ensure that the general public is adequately involved in the decision-making process.

## **Conclusion**

Valley Metro conducts public outreach throughout the year to involve the general public with activities and transit planning processes. Using a variety of communication techniques such as facilitating meetings at varied times and locations using multiple formats, placing printed materials at multiple outlets and providing opportunities via phone and web to share or collect information, Valley Metro ensures that outreach efforts include opportunities for minority, low-income and LEP populations that may be impacted by the activity or transit planning process under consideration. Valley Metro will continue to involve all communities in an effort to be inclusive of all populations throughout the Metropolitan Phoenix area and also to comply with Federal regulations. Valley Metro will continue to monitor and update this Inclusive Public Participation Plan as part of the Title VI Program which is updated triennially.

# **Title VI Implementation Plan Attachment “B”**

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## **LANGUAGE ASSISTANCE PLAN**

## LANGUAGE ASSISTANCE PLAN

Federal agencies have published guidance for their respective recipients in order to assist them with their obligations to limited English proficiency (LEP) persons under Title VI. This order applies to all state and local agencies that receive federal dollars. The explanation of the required Language Assistance Plan outlined below is based on federal guidance provided in Federal Transit Administration (FTA) Circular 4702.1B.

### **Language Assistance Needs Assessment – Four Factor Analysis**

The following outlines how to identify a person who may require language assistance, the ways in which Valley Metro and the City of Phoenix Public Transit Department, provides such assistance, any staff training that may be required to provide such services, and the resources available to reach out to the people who may need language assistance service. In order to prepare the Language Assistance Plan (LAP), a needs assessment is conducted utilizing the four factor analysis. The four factors are:

*Factor 1:* The number or proportion of LEP persons eligible to be served or likely to be encountered by Valley Metro and City of Phoenix Public Transit Department services and programs.

*Factor 2:* The frequency with which LEP persons come into contact with Valley Metro and City of Phoenix Public Transit Department services and programs.

*Factor 3:* The nature and importance of the Valley Metro and City of Phoenix Public Transit Department services and programs in people's lives.

*Factor 4:* The resources available to the Valley Metro and the City of Phoenix Public Transit Department for LEP out-reach, as well as, the costs associated with the out-reach.

The following is an explanation of what is to be included in the four factor LEP population needs assessment. In addition to the following explanation, Valley Metro has conducted a thorough LEP four factor analysis and resulting Language Access Plan to be utilized by all Valley Metro member agencies. Please refer to Attachment A for the Language Assistance Plan.

*Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the Valley Metro and City of Phoenix Public Transit Department services and programs.*

An effective Language Assistance Plan is the preferred way of determining the extent to which the transportation needs of the LEP population mirror those of the community at large and the extent to which LEP persons have different needs that should be



addressed through the transit service planning and facilities project development process.

*Demographic Profiles for Communities of Concern* Communities of concern describe populations that have been determined by the federal government as benefiting from protections to ensure their meaningful involvement in planning and services. These vulnerable populations have been identified through the Civil Rights Act of 1964, Executive Order 12898, and Executive Order 13166 to end discrimination and ensure equal access to all federally funded services.

To assist with the identification of Title VI neighborhoods, the presence of Title VI populations is compared against the Maricopa County average for each community of concern. Linguistic isolation follows federal guidance at five percent within a census block of 1,000 people or more within a neighborhood. Based on the 2008 to 2012 American Community Survey five-year estimates, the threshold for each mandated community of concern is as follows:

Communities of concern are identified as those census tracts where the identified group represents a percentage of the population equal to or greater than that of the Maricopa County average. Federal guidelines state that minority populations should be identified where either (a) the minority population of the affected area exceeds 50 percent, or (b) the minority population percentage of the affected area is measurably greater than the minority population percentage in the general population or other appropriate unit of geographic analysis—in this case, Maricopa County.

*Limited English Proficient (LEP) households:* A person with limited English proficiency is described as a person who does not speak English as a primary language and has a limited ability to read, write, speak and understand English. An area is identified as LEP when five percent or more of the population, or 1,000 people within a neighborhood, fit this definition. The Census Bureau further defines households as linguistically isolated when there are no members aged 14 years and over who speak only English or who speak a non-English language and speak English “very well.” In other words, all members of the household ages 14 years and over have at least some difficulty with English.

*Factor 2: The frequency with which LEP persons come into contact with Valley Metro and City of Phoenix Public Transit Department services and programs.*

The Valley Metro Planning and Community Relations divisions have conducted a thorough analysis of the frequency with which LEP persons come into contact with the Valley Metro system through a combination of surveys to community groups serving this population, as well as demographic mapping of service crossing census tracts with greater than average concentration of minority, low income and LEP populations. Please refer to the in-depth LEP analysis conducted by Valley Metro in *Attachment A:*



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*Valley Metro Limited English Proficiency Four Factor Analysis and Language Access Plan.*

*Factor 3: The nature and importance of the Valley Metro and City of Phoenix Public Transit Department services and programs in people's lives.*

An analysis of benefits and burdens is a critical component of the Valley Metro and City of Phoenix Public Transit Department's Title VI Program. The Valley Metro Community Relations department, in partnership with the City of Phoenix Public Transit Department, analyzes the feedback reported by communities of concern to determine the potential benefits and burdens of a transportation service or fare change on the population. In addition, proposed transportation improvements are analyzed and documented to determine if the improvements impose a disproportionate burden on the communities of concern. This analysis, as well as the input from communities of concern, is incorporated as proposed service and fare changes advance through the Valley Metro and City of Phoenix committee, board and council processes for approval. Feedback from Title VI populations will be used to assess any enhancements to the Title VI Plan on a biennial basis.



## **SECTION 6 COLLECTION OF DEMOGRAPHIC DATA**

## OVERVIEW

This section is a demographic analysis of the population within Maricopa County and Valley Metro's Service Area, which is a one-half mile radial buffer around fixed route services. In order to be familiar with the low-income and minority demographics of the area, Valley Metro uses the most current and accurate data available from the US Census Bureau and the Valley Metro Origin and Destination Survey which is conducted every three years.

The following data for minority and low-income populations were gathered from the Census Bureau's 2013 American Community Survey (ACS) 5-year estimates. Low income is defined as the population with incomes at or below 150 percent of the Department of Health and Human Services poverty level.

This section also provides a summary of the results from the 2010-2011 On-Board Survey, which is currently the best available data to observe ridership characteristics and fare usage of minority and low income populations on fixed routes within the Valley Metro network.

## CENSUS DATA

Table 3 summarizes the minority and low-income populations of all the Census Tracts within the County and Valley Metro's service area, the one-half mile buffer around fixed route transit services, based on data from the 2013 American Community Survey. Map 1 below is a map of the service area, Maricopa County.

**Table 3 Minority and Low-Income Population Summary**

	Total Population	Minority Population	Percent Minority	Low-Income Population	Percent Low-Income
Maricopa County	3,889,161	1,624,496	41.8%	993,917	25.5%
Service Area (1/2-mile buffer around fixed route service)	3,249,332	1,475,404	45.4%	902,415	27.8%

Table 4 summarizes the racial distribution among the population within the County and service area. The total minority population within the service area is 1,624,496, 42.1% of the total population. The three largest racial groups, other than White, are Asian, Black/African American, and American Indian/Alaskan Native. The category Two or More Races represents people who consider themselves to be any combination of races, and the other categories represent people who consider themselves to be of one race. It should be noted that the category Hispanic/Latino is an ethnicity and not a race.

**Table 4 Racial and Hispanic Distribution**

Total Population	White	African American	American Indian	Asian	Other Races	Two or More Races	Hispanic/Latino (Any Race)
<b>Maricopa County</b>							
3,889,161	3,137,012	199,310	72,913	138,405	221,937	111,794	1,155,592
100%	80.6%	5.1%	1.9%	3.6%	5.7%	2.9%	29.7%
<b>Service Area (1/2-mile buffer around fixed route service)</b>							
3,249,332	2,576,408	181,225	65,879	119,649	204,000	95,519	1,060,463
100%	79.3%	5.6%	2.0%	3.7%	6.3%	2.9%	32.6%

## PASSENGER SURVEY (ORIGIN AND DESTINATION SURVEY)

Between October 2010 and February 2011, Valley Metro conducted an on-board transit survey. The purpose of the survey was to better understand the travel pattern of transit users in the metropolitan Phoenix area, particularly the impact that light rail has had on regional travel patterns. The results of the survey will be used to update regional travel demand models and improve the overall quality of transit services in the region.

The survey, which included nearly 100 bus routes and all light rail stations, was the largest and most comprehensive origin and destination survey ever conducted by Valley Metro. The goal was to obtain useable surveys from approximately 13,750 passengers. The actual number of usable surveys was 15,780. Of the useable surveys, 4,732 were completed with light rail passengers and 11,048 were completed with bus passengers. The magnitude of the survey will allow regional planners to better understand the needs and travel patterns of many specialized populations. For example, the final database contains responses from:

- more than 6,600 people who do not have cars
- nearly 1,600 people under age 18
- nearly 1,000 people age 60 or older
- more than 6,000 students, including more than 4,000 college/university students
- nearly 2,000 students in grades K-12

- more than 3,300 people living in households with incomes of less than \$10,000 per year
- more than 9,000 people who were employed full or part time
- nearly 3,000 people who were not employed but were seeking work

### Major Findings

Some of the major findings from the survey include the following:

- **Public Transit Usage in the Metropolitan Phoenix Area Is Significant.** Ridership reports show that there are approximately 250,000 transit boardings per day or 1.25 million boardings during a typical 5-day work week. By providing residents with a reliable mode of transportation, the region's transit system is having a positive impact on traffic flow and air quality by reducing the number of trips that would have otherwise been completed by car.
- **Transit Users Are Using Public Transit More Often.** Among those who had been using public transit in the metropolitan Phoenix area at least two years, sixty one percent (61%) reported that they were using public transportation more often than they did two years ago. Among light rail users, nearly 80% reported that they were using public transit more often than they were two years ago before light rail began operations. The high percentage of light rail users who reported using public transit more often suggests that light rail has significantly enhanced the effectiveness of public transportation in the region.
- **Public Transit Is Important to the Region's Economy.** More than one-third (35%) of all transit trips represented in the survey either began or ended at work. When asked to report their employment status, more than three-fourths (78%) of those surveyed indicated that they were currently employed or seeking work. Among those seeking work, more than 30% indicated that they could not have completed their trip if public transportation were not available. Another 10% indicated that they did not know how they would have completed their trip if public transit had not been available.
- **Public Transit Is Important to Education in the Region.** Thirty-nine percent (39%) of those surveyed identified themselves as students, which explains the reason that nearly one-third (31%) of all transit trips represented in the survey either began or ended at a college/university or a K-12 school. On a typical weekday, more than 70,000 school-related trips are completed on public transportation in the metropolitan Phoenix area. If public transportation were not available, 16% of the students surveyed indicated that they would not have been able to get to school. Another 8% did not know how they would have gotten to school if public transit had not been available.

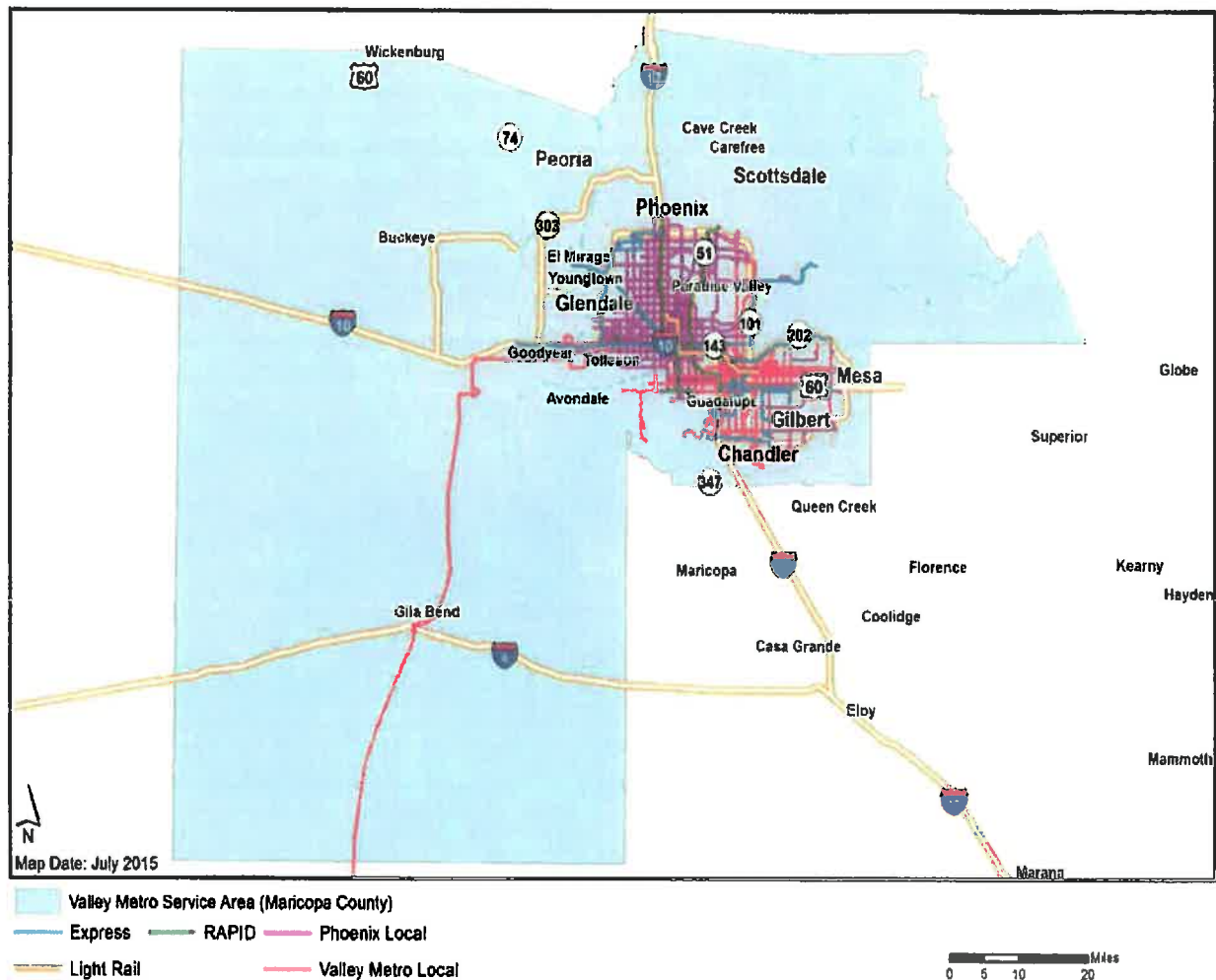
- **The Demographic Profile of Public Transit Riders Has Changed Since the Introduction of Light Rail.**
  - o Transit riders are more likely to have a driver's license. Among those who began using public transit in the Phoenix area after light rail service began, 57% have a valid driver's license compared to just 43% of those who began using public transit before light rail service was available.
  - o Transit riders are more likely to have annual household incomes above \$50,000. Among those who began using public transit in the Phoenix area after light rail service began, 22% had annual household incomes above \$50,000 compared to 18% of those who began using public transit before light rail service was available.
  - o Transit riders are more likely to be students. Among those who began using public transit after light rail service began, 45% were students compared to 36% of those surveyed who were using transit before light rail service began.

The full On-Board Transit Survey Report is in Attachment B.

## DEMOGRAPHIC MAPS

Map 1 displays all fixed bus routes and light rail transit service within the region.

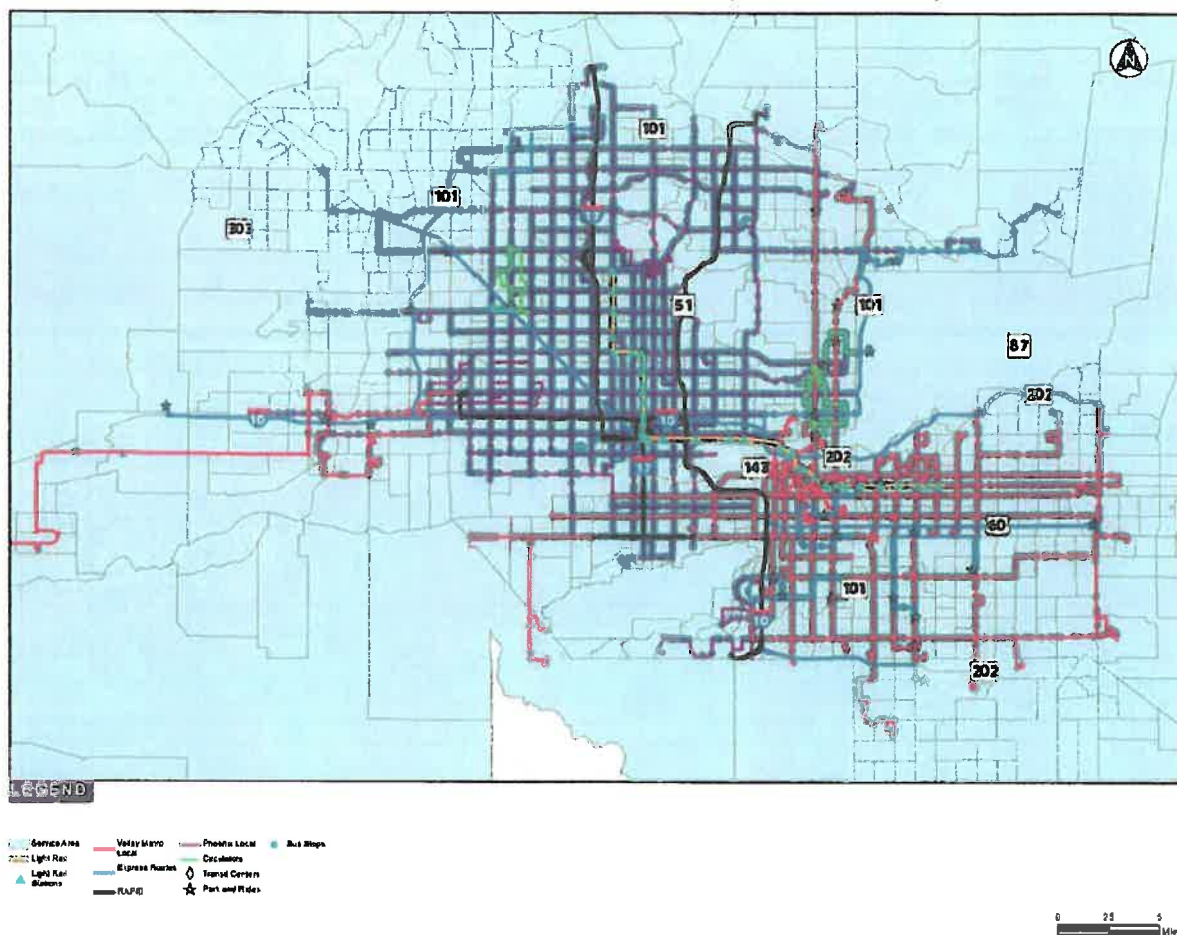
**Map 1: Maricopa County and Fixed Route Transit Service**





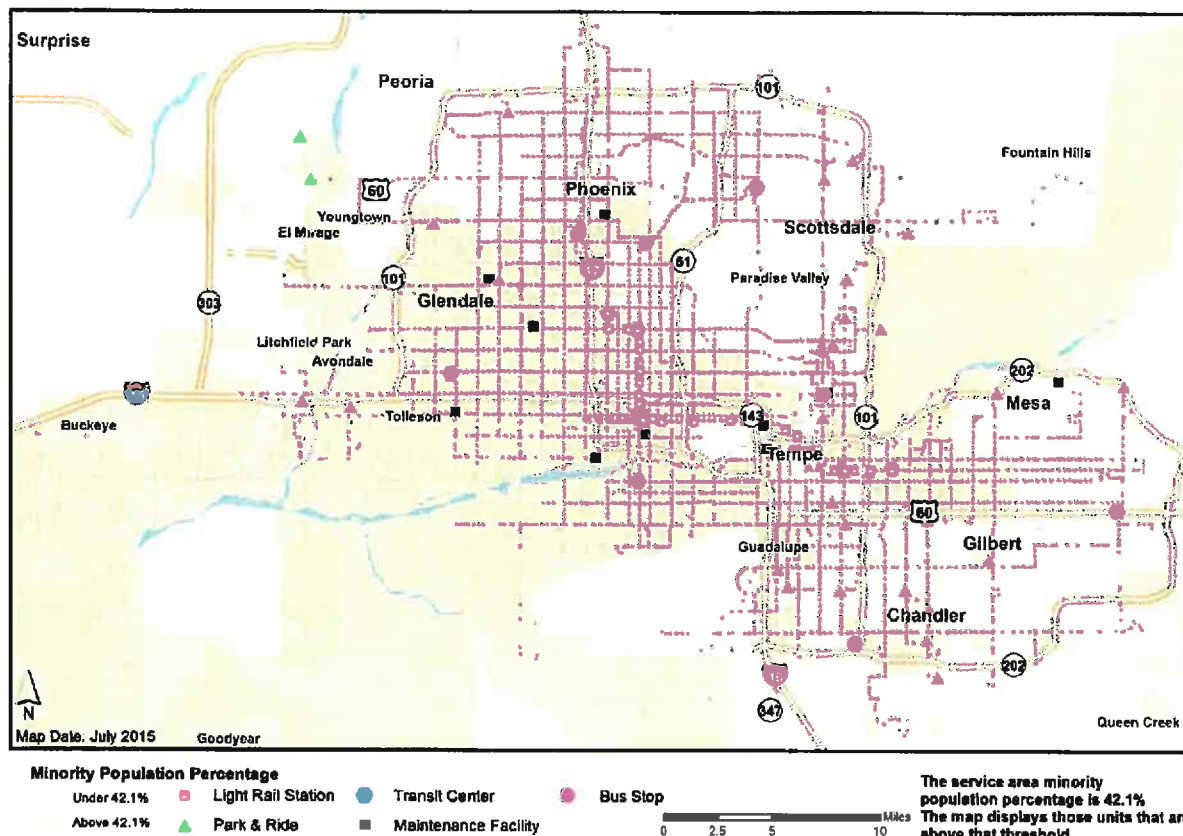
Map 2 displays a closer view of the fixed route transit service in the region. This map also includes bus stops, light rail stations, park-and-ride facilities, and transit centers.

**Map 2 Fixed Route Transit Service (Zoomed View)**



Map 3 displays a closer view of the minority population and the relation to the regional transit system amenities. This includes bus stops, light rail stations, park-and-ride facilities, maintenance facilities, and transit centers.

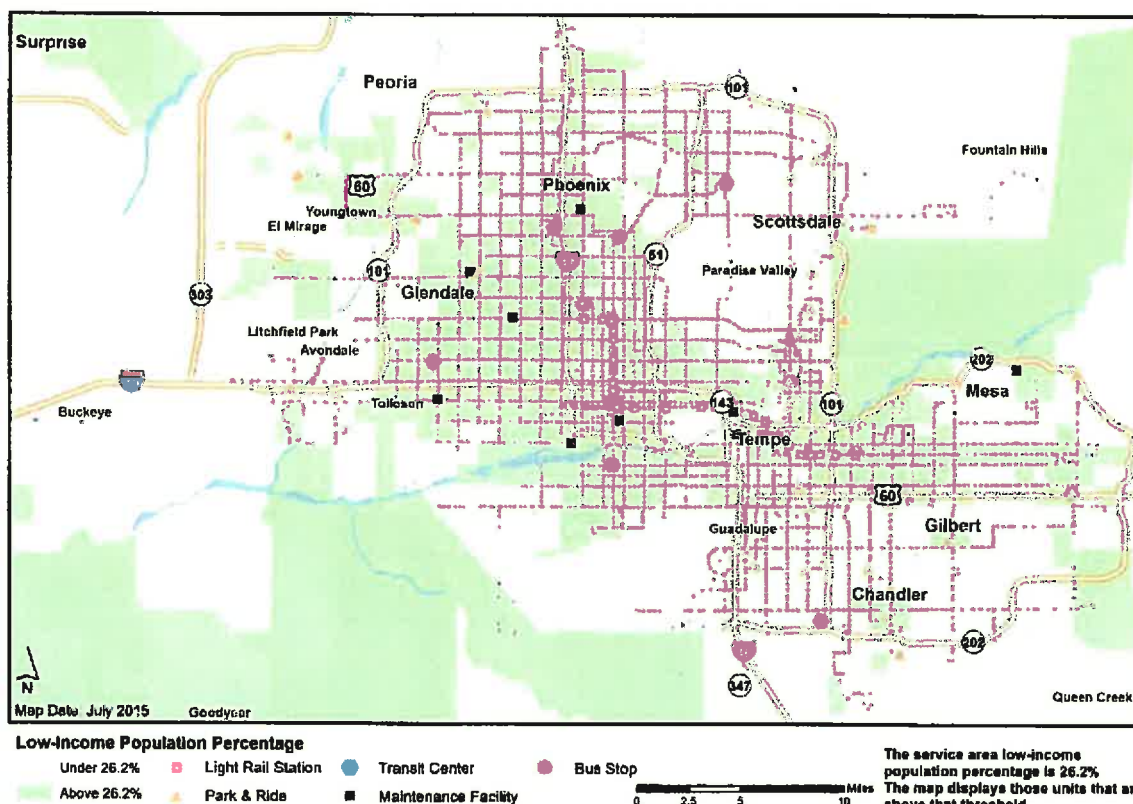
**Map 3 Fixed Route Transit System Amenities and Minority Populations**





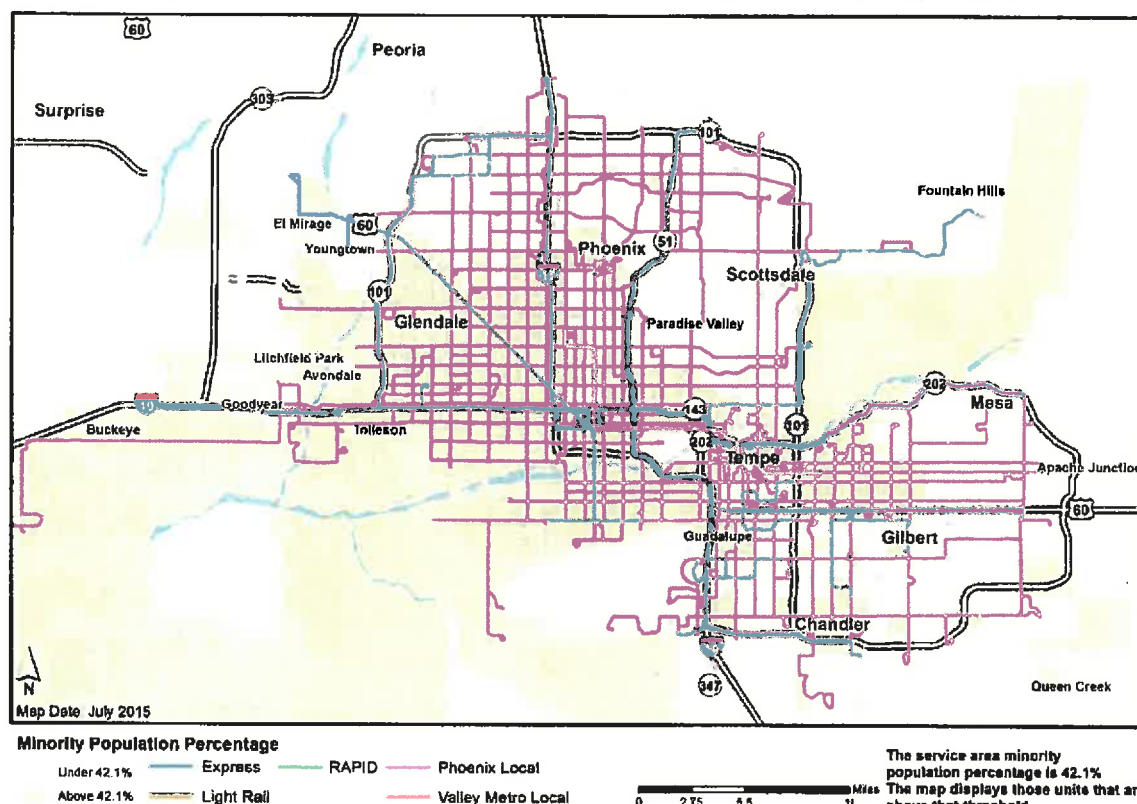
Map 3 displays a closer view of the low-income population and the relation to the regional transit system amenities. This includes bus stops, light rail stations, park-and-ride facilities, maintenance facilities, and transit centers.

**Map 3 Fixed Route Transit System Amenities and Low-Income Populations**



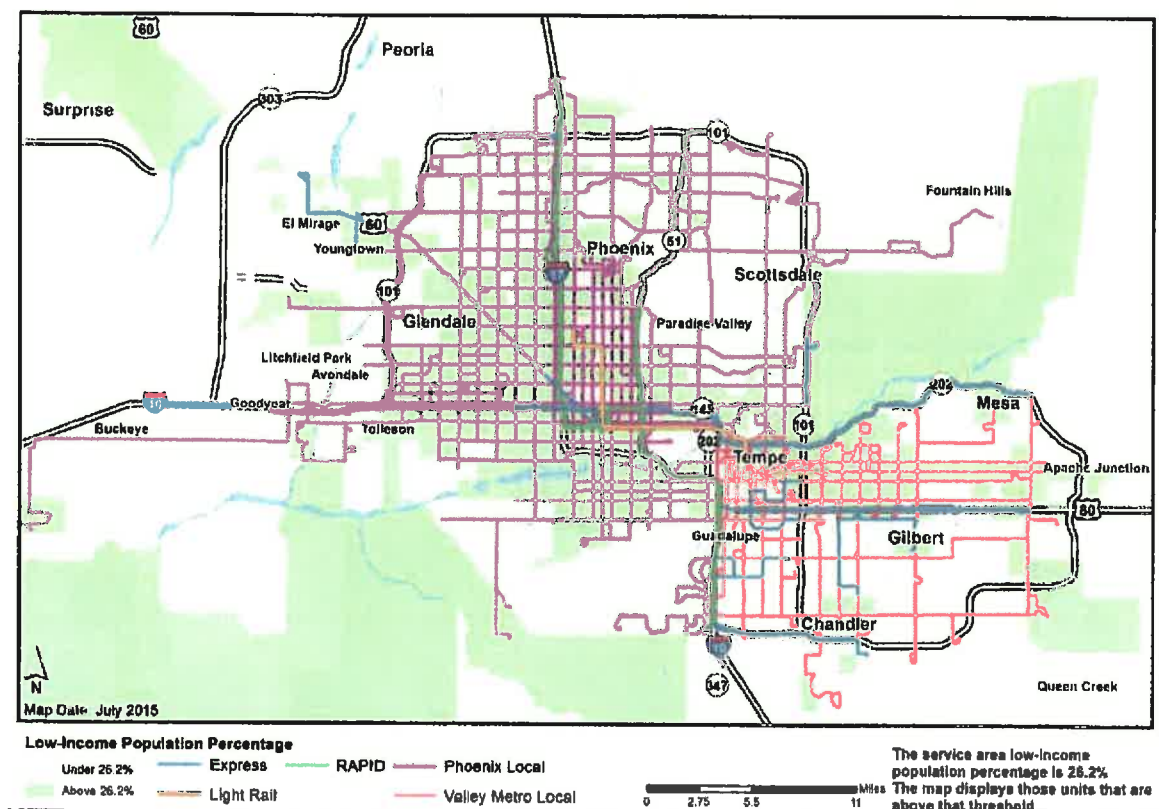
Map 4 displays the concentrations of minority populations within the fixed route transit service area by showing the census tracts that are below and above the route service area minority population average.

**Map 4 Fixed Routes and Census Tracts by Minority Population**



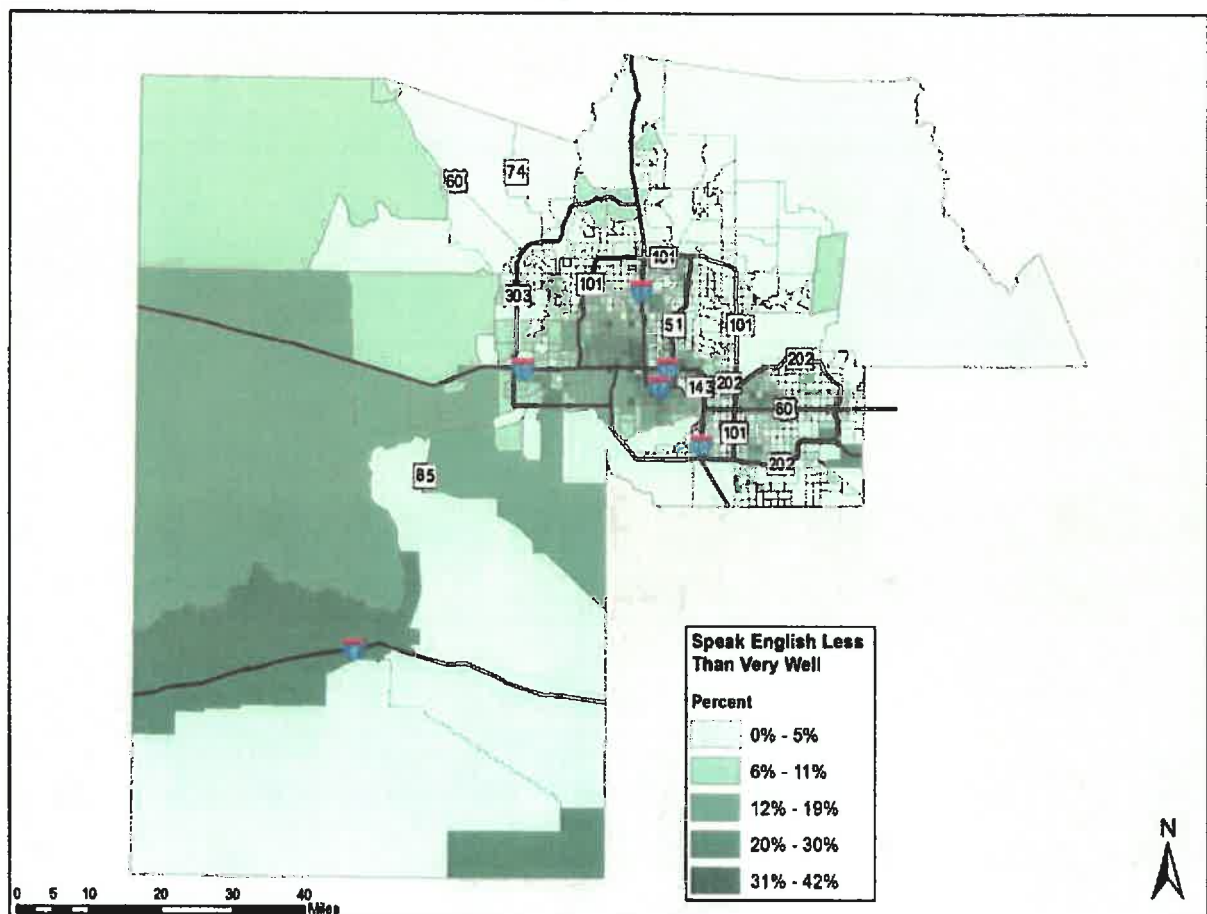
Map 5 the concentrations of low-income populations within the fixed route transit service area by showing the census tracts that are below and above the route service area low-income population average.

**Map 5 Fixed Routes and Census Tracts by Low-Income Population**



Map 6 displays the population within Maricopa County and the fixed route transit service area that speak English less than very well per census tracts.

**Map 6 Limited English Proficiency Population – Speak English Less Than Very Well**



Source: ACS 2013

## **Title VI Implementation Plan Attachment “C”**

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### **National Environmental Policy Act (NEPA) Categorical Exclusion Report**

## Attachment "C"



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

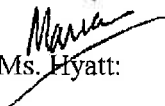
REGION IX  
Arizona, California,  
Hawaii, Nevada, Guam  
American Samoa,  
Northern Mariana Islands

201 Mission Street  
Suite 1650  
San Francisco, CA 94105-1839  
415-744-3133  
415-744-2726 (fax)

DEC 16 2014

Ms. Maria Hyatt  
Public Transit Director  
City of Phoenix  
302 North First Avenue, Suite 900  
Phoenix, AZ 85003

Re: Categorical Exclusion Request for Proposed  
Glendale Transit Center Project at Arrowhead  
Towne Center in Glendale, Arizona

  
Dear Ms. Hyatt:

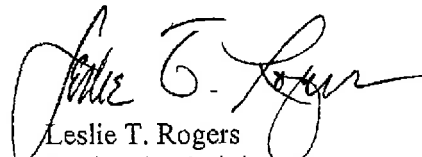
The Federal Transit Administration (FTA) has completed its review of your November 14, 2014 letter requesting an environmental determination for the proposed Glendale Transit Center Project which expands existing bus transit facilities entirely within the mall property of Arrowhead Towne Center in the City of Glendale. Based on the information presented in your request letter and the supporting documentation you submitted, we concur in your determination that the project qualifies as a categorical exclusion under 23 CFR Part 771.118(c)(8).

Your letter states that the project is consistent with the criteria associated with this categorical exclusion. We agree with your assessment that the project is consistent with the criteria under the requirements for this categorical exclusion.

This review, which is based on past experience with similar projects, finds that the project: does not induce significant environmental impacts to planned growth or land use for the area; does not require the relocation of significant numbers of people; does not have a significant impact on natural, cultural, recreational, historical or other resource; does not involve significant air, noise, or water quality impacts; does not have significant impacts on travel patterns; and does not otherwise, either individually or cumulatively, have any significant environmental impact.

If you have any questions about this review, please contact Dominique Paukowits, FTA Region IX Community Planner, at (415) 744-2735 or [dominique.paukowits@dot.gov](mailto:dominique.paukowits@dot.gov).

Sincerely,

  
Leslie T. Rogers  
Regional Administrator

cc: Jorie Besnahan, City of Phoenix  
Matthew Dudley, City of Glendale

# Board Approval for the Title VI Program

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ATTACH A COPY OF THE BOARD MEETING MINUTES HERE