

Title VI Plan

April 2021-March 2024
FOR THE FEDERAL TRANSIT ADMINISTRATION
AND WASHINGTON STATE DEPARTMENT OF TRANSPORTANTION

PREPARED BY:
Jefferson Transit Authority
63 4 Corners Road
Port Townsend, WA 98368

Revision Adopted by Jefferson Transit Authority Board Resolution, June 20, 2023

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INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color and national origin in programs and activities receiving Federal financial assistance.

Jefferson Transit Authority (JTA) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B

TITLE VI COMPLAINT PROCEDURES

Jefferson Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B. If you believe you have been subjected to discrimination under Title VI, you may file a complaint.

How to file a Title VI Complaint

You may file a signed, written complaint up to one hundred and eighty (180) days from the date the complainant became aware of the incident. The complaint should include the following information:

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

A form is available at: Jefferson Transit's Port Townsend office (address below) or on JTA's website at http://jeffersontransit.com (About JTA/Policies/Title Plan 2018-2021). It can also be requested by emailing custserv@jeffersontransit.com or calling 360-385-4777 or toll free 1-800-371-0497. JTA's Title VI Complaint form is attached to this document. (Attachment 2)

The complaint may be filed in writing with Jefferson Transit Authority at the following address:

63 4 Corners Road Port Townsend, WA 98368-9366

NOTE: Jefferson Transit Authority encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 180 days from the date the complainant became aware of the incident.

What happens to your complaint after it is submitted to Jefferson Transit Authority?

- 1. Upon receipt of the complaint, the General Manager will be responsible for notifying the respondent(s) of the complaint within five working days of receipt. Additionally, a copy of the complaint will be forwarded for review by the JTA attorney.
- 2. The General Manager shall be given 15 working days from receipt of the complaint to inform the complainant as to the status of the investigation and/or resolution of the complaint.
- 3. If the complaint is against a sub-recipient, consultant, or contractor, the appropriate project manager shall be notified of the complaint within 15 working days of the receipt of the complaint.
- 4. Within 60 working days of the receipt of the complaint, the investigator* will prepare a written report for the General Manager. The report shall include a narrative description of the incident, identification of persons interviewed, a finding, and recommendations for disposition. *This can be JTA's Title VI Coordinator, the Title VI Specialist for a sub-recipient of federal funds, or the FTA Title VI Liaison.
- 5. The investigative report and findings of the complaint will be sent to JTA for review and comment by JTA's attorney.
- 6. The recommendation(s) shall be reviewed by the General Manager. The General Manager will discuss the report and recommendations with the JTA Board Chair.
- 7. If the complaint cannot be resolved by the General Manager, the complainant or respondent shall be notified of their appeal rights to JTA's Board of Directors and/or FTA.
- 8. A copy of the complaint and JTA's investigation report will be issued to FTA within 60 days of the receipt of the complaint.
- 9. After receiving FTA's comments, the investigation report will be released and briefings scheduled with all relevant parties.
- 10. If the complainant is not satisfied with the results of the investigation of the alleged discriminatory practice(s), s/he shall be advised of their rights to appeal JTA's decision to the U.S. Department of Transportation. The complainant has 180 days after JTA's final resolution to appeal to USDOT. Unless new facts not previously considered come to light, reconsideration (appeal) by JTA will not be available.
- 11. JTA will retain all complaints filed in accordance with WSDOT Consolidated Grant Program retention requirements.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

Washington State Department of Transportation Public Transportation Division Attn: Title VI Coordinator PO Box 47387 Olympia, WA 98504-7387

Federal Transit Administration Office of Civil Rights Attention: Title VI Program Coordinator 1200 New Jersey Ave., SE Washington, DC 20590

United States Department of Justice Civil Rights Division 950 Pennsylvania Avenue NW Coordination and Review Section – NWB Washington DC, 20530

RECORD OF TITLE VI OR OTHER CIVIL RIGHTS INVESTIGATIONS, COMPLAINTS OR LAWSUITS

As of February 16, 2021, and in the three years prior to this date, JTA has no active lawsuits, investigations, or complaints alleging discrimination on the basis of race, color, or national origin with respect to service or other transit benefits.

Title VI -Investigations, Complaints and Lawsuits

Date	Type*	Summary of Allegation	Actions Taken	Status

^{* (}I) Investigations, (C) Complaints, (L) Lawsuits

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

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

<u>Census</u>. The United States is home to millions of national origin minority individuals who are Limited English Proficiency (LEP). That is, their primary language is not English and they cannot speak, read, write or understand the English language at a level that permits them to interact effectively with recipients of Federal financial assistance.

Because of language differences and the inability to effectively speak or understand English, persons with LEP may be subject to exclusion from programs or activities, experience delays or denials of services. These individuals may be entitled to language assistance with respect to a particular type of service. The federal government and those receiving assistance from the federal government must take reasonable steps to ensure that LEP persons have meaningful access to the programs, services, and information those entities provide.

This will require agencies to establish creative solutions to address the needs of this ever-growing population of individuals, for whom English is not their primary language.

According to the ALPACA, using Census 2015 5-Year American Community Survey (ACS) Data for Jefferson County, English is spoken by 99.5% of Jefferson County. Spanish, Indo/European and other LEP speaking in the household represents 0.5% of the non-English speaking population in Jefferson County. (Attachment 3)

ANALYSIS OF FACTORS

Factor No. 1: The number or proportion of LEP persons in the service area.

JTA's jurisdiction covers Jefferson County with connecting routes into Clallam, Grays Harbor and Kitsap Counties which are largely English speaking. The vast majority of the population with which we do business (individuals wishing to ride transit) is largely English speaking. Our Jefferson Transit Olympic Connection (JTOC) starts in Forks at the Forks Transit Center in Clallam County. Forks has a total population of 4,508, with a Spanish population of 4.8% (338 people). We service only a small portion of the Forks' population. Jefferson County has a total population of 29,848, with a Spanish population of 0.01% (29 people), an Asian and Pacific Island speaking population of 0.3% (81 people), and an Indo/European speaking population of 0.1% (25 people) in the combined service area that are included in the total figures. If we merge the Forks LEP statistics into our Jefferson County LEP statistics we have a total population of 34,356 with a non-English speaking populace of 473 people. The total percentage of LEP in our service area is 1.3% of the population.

Factor No. 2. The frequency with which LEP individuals come into contact with the service.

(All) contacts with JTA are made through phone, email, written communication, via fax or in person. We potentially serve LEP persons daily via: bus; purchase of passes and tickets through drivers and JTA's customer service; rider questions to drivers, customer service, and dispatch; Dial-A-Ride (DAR) applications; Vanpool inquires; participation in public meetings, and through customer comments. An informal verbal survey was made of customer service clerks and dispatchers who answer call center information requests. They stated that they sometimes have a person call with a strong accent but they have never received a call where someone expected them to answer in a language other than English. In an informal survey of our West End route supervisor and drivers, they stated that they did not have problems communicating with Spanish speaking passengers.

The Customer Service clerks speak English and translate in person or over the phone a total of approximately zero times a day. We have an average of zero calls a month that require translations.

Factor No. 3: The nature and importance of service provided by Jefferson Transit Authority.

JTA provides important transit services to the public through Fixed Route, Deviated-Fixed Route and ADA Dial-A-Ride services. JTA's Mobility Operations Manager works closely with three local Boards to ensure JTA is providing meaningful access for those passengers with disabilities. The three organizations are: Jefferson County Council of the Blind, Disability Awareness Starts Here (DASH), and JC Developmental Disability Advisory Board. Jefferson County has a 0.5% LEP population; therefore, Jefferson County does not offer an LEP outreach in which our Mobility Operations Manager can participate.

Factor No. 4. The resources available to the recipient of the federal funds to assure meaningful access to the service by LEP persons. Jefferson Transit Authority's current in-house language capabilities are in English only.

The transit system also recognizes the need to have language services in other languages besides English and has implemented:

- LanguageLine Solutions This is a phone service for assistance in communicating with limited English speaking customers. Customer Service, Dispatch, and all other office employees have access to this phone service. Drivers who need interpreters for LEP passengers will call Customer Service or Dispatch who will then proceed to call LanguageLine Solutions for assistance.
- Google Translate on website This feature translates JTA's website into dozens of different languages, including Spanish.

IMPLEMENTATION PLAN

Jefferson Transit Authority currently has implemented its plan and will review it annually, including any contacts with the LEP persons to determine the frequency of contacts, the language used, and how the contacts were handled.

We have identified LEP persons in the service area by: informal surveys of the drivers, customer service and dispatch; by customer comments/complaints; and by the latest ALPACA statistics. This data shows we have a 0.5% LEP population. Because of the higher percentage of Spanish LEP in Forks, JTA implemented LanguageLine in 2015 for their translation services. This provides JTA with a measurable record of LEP contacts that need translation services. The Mobility Operations Manager will update the language access plan if needed. JTA will continue LanguageLine through 2024.

Due to the small numbers of LEP individuals and lack of contact or requests, we have not yet needed to develop materials in any language except English. Customer Service has a chart, provided by LanguageLine, in which an LEP individual can identify their language for translation. Customer Service will then call LanguageLine and begin communication with the LEP individual.

Customer Service and Dispatch have been trained in how to use LanguageLine. Drivers have been instructed to connect the LEP individual with JTA's Customer Service or Dispatch.

NOTIFYING BENEFICIARIES OF THEIR RIGHTS UNDER TITLE VI

In order to comply with 49 CFR 21.9(d), Jefferson Transit Authority and its sub-recipients must provide information to beneficiaries regarding their Title VI obligations and inform beneficiaries of the protections against discrimination afforded them by Title VI. JTA has established a statement of rights and a policy statement.

Jefferson Transit Authority, Title VI Notice to the Public is:

- 1) Posted on JTA's website at http://jeffersontransit.com, and in the lobby of JTA's headquarters (Attachment 4)
- 2) Written on JTA's Customer Service Comment Cards that are available on all revenue service vehicles (Attachment 5)

3) Written within JTA's Bus Schedule Pamphlets (Attachment 6)

ANALYSIS OF CONSTRUCTION PROJECTS

Over the last three years Jefferson Transit has:

Completed construction of a covered bike locker building, fifty new parking spaces, and a trail extension at its 63 4 Corners Park & Ride Facility in March of 2018. This made the Park & Ride facility Multi-Modal. The trail extension is intended to connect the Larry Scott Trail to Port Townsend and to eventually connect to the Olympic Discovery Trail, which spans across the Olympic Peninsula.

Completed installation of a standalone, two stall public restroom building at Haines Place Transit Center in November 2019. Both stalls are ADA compliant, increasing public access to restroom facilities in the downtown Port Townsend area.

INCLUSIVE PUBLIC PARTICIPATION

Community Outreach is a requirement of Title VI. Recipients and sub-recipients shall seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach. Recipients have wide latitude to determine what specific measures are most appropriate and should make this determination based on the composition of the affected population, the public involvement process, and the resources of Jefferson Transit Authority.

Jefferson Transit Authority has engaged the public in its planning and decision-making processes, as well as its marketing and outreach activities. Jefferson Transit Authority has developed a comprehensive Public Participation Plan (PPP) which outlines the goals and objectives for public participation. (Attachment 7).

Transit Development Plan (TDP). The Transit Development Plan is a requirement of the Washington State Legislature. The Plan is prepared by the independent transit properties and turned into the State DOT. A summary document is prepared which shows the size of the fleet, costs, revenue, service revenue hours, revenue miles, expense and capital expenditures. Public hearings are held to obtain comments from the public on the TDP.

Transit Improvement Plan (TIP). Another document called the Transit Improvement Plan is prepared and it is used by the cities and counties. The TIP is a planning document that only addresses capital projects and improvement projects in cities and counties. All TIPs from local jurisdictions (counties and cities) as well as "transit agencies" feed into a Regional TIP which is required by the federal government. If an item we wish to purchase is not in the TIP, it cannot be funded. TIP is only for capital projects and represents the capital section of the Transit Development Plan. Although TIP is a federal requirement, it

goes through the region and the state. Public hearings are held to obtain comments from the public on the TIP.

Board Meetings. The Jefferson Transit Authority Board is comprised of all three Jefferson County Commissioners, two City Council members appointed from the City of Port Townsend and one nonvoting member representing the interests of Amalgamated Transit Union #587.

The Jefferson Transit Authority Board meets on the 3rd Tuesday of every other even month at Jefferson Transit Administration and Maintenance Facility located at 63 Four Corners Road, Port Townsend, WA. The meetings are held at 1:30 p.m. and are open to the public. Since the COVID-19 Pandemic began in March 2020, all Jefferson Transit Authority Board meetings have been held remotely, with a public login or toll-free dial-in number listed on jeffersontransit.com so that members of the public may still attend.

Agendas are made available to the public by 5:00 p.m. on the Thursday prior to the meeting. The Agenda is available on the website or by visiting the Jefferson Transit Administration and Maintenance Facility at 63 Four Corners Road in Port Townsend. The Agendas have a notice stating; "Individuals requiring reasonable accommodation may request written materials in alternative formats, physical accessibility accommodation or other reasonable accommodation by calling (360) 385-4777 or TDD/TTY users may dial 711 to reach a relay operator." JTA publishes notices in the Port Townsend/Jefferson County Leader (The Leader) stating meeting locations and times. The Jefferson Transit Authority Board welcomes customer comments and provides a customer comment period at the beginning and end of every meeting.

Public Meetings. Public Meetings are held during Board meetings to enlist public comment on the budget or TDP. Notices are posted on JTA's website, published in The Leader, and posted on JTA's office building door.

Major Service Change. Public meetings are held throughout the community to obtain comments regarding the service change. A public meeting is held with the Authority Board Meeting. The proposed changes are presented for public and Board comments. Staff reviews the comments from the Route Design committee, public and Authority Board. The proposed service changes are revised if appropriate or necessary. Another public hearing is held as a final opportunity for public and employee comments on the proposals. The Authority Board then takes action on the changes.

One public hearing was held on August 28, 2020 to adopt the Transit Development Plan (TDP). Another public hearing was held on November 17, 2020 to hear the proposed 2021 budget and adopt an amendment to the CARES Act Grant.

Fare Increase. The fare structure is reviewed annually as part of the budgetary process. If a fare increase is determined necessary, there is a review of the data. Staff develops options to review. The fare increase is to be a consistent fare structure that maintains equity based upon service type and cost. The proposed changes are presented for public and Board comments. Staff review the comments from the public and Authority Board. The proposed service changes are revised if appropriate or necessary. A public hearing is held as a final opportunity for public and employees to comment on the proposals. The Authority Board then takes action on the changes. JTA's last fare increase went into effect on July 1, 2009. During the COVID-19 Pandemic Jefferson Transit Authority declared an Emergency and elected to

go fare free to reduce contact between operators and passengers. This decision will be reviewed by the Authority Board when the Emergency Declaration is lifted.

Travel Training Class. Upon request, our Mobility Operations Manager will teach riders how to use JTA services including, navigate and use fixed route and paratransit services, best practices in personal safety and awareness when riding public transit, utilize ADA accessible equipment, make connections with neighboring transportation agencies.

Customer Complaint Process. Customer Service Comment/Complaint forms are available on all revenue service vehicles and the Haines Place Transit Center. Complaint procedures may be viewed and a complaint may be submitted via the website at www.jeffersontransit.com. Copies of the complaint procedure and/or complaint may be requested by phone, U.S. Mail or picked up at JTA's office.

All feedback from customers is valued and will be reviewed and distributed to the appropriate agency representative(s). Customers shall receive a response back within three to seven business days, depending on the mode of communication.

All comments were addressed in the appropriate time span.

General Awareness and Phone Surveys. JTA is working with Fehr & Peers to develop a new long-range plan. Together, JTA and Fehr & Peers conducted a survey available online, by mail, or in-person. Web surveys are done at www.jeffersontransit.com.

A survey of ridership was conducted during the COVID-19 Pandemic to ascertain the public's level of comfort riding transit during a national health crisis.

For General Awareness see the Jefferson Transit Authority Review of 2019-2020 Public Participation for a summary of JTA's outreaches. (Attachment 8)

Bilingual Outreach. We have no bilingual outreach at this time. Our Service area population is 98.9% English speaking.

MEMBERSHIP OF NON-ELECTED COMMITTEES

Jefferson Transit values the viewpoints of minority, LEP and low income participants in the community. The membership of these non-elected committees is selected by Jefferson Transit to supplement the elected decision making bodies that represent the transportation interests of our service area.

Jefferson Transit strives to select representation from low-income, minority and LEP populations within our service area whenever existing committee positions are available, or during the formation of a new committee/council. JTA solicits a list of volunteers from JTA's outreach modes and local agencies.

Committees are on an ad hoc basis.

JTA formed a Transit Advisory Group (TAG) and held its first meeting in August of 2019. Meeting dates/times, agendas and minutes can be found online at www.jeffersontransit.com. Current racial breakdown of TAG members is as follows:

TAG Members: 6

Member Race Identified: White (6)

FIXED ROUTE SERVICE STANDARDS

Jefferson Transit Authority has developed quantitative standards for fixed route operations to better understand and track the performance of our service to minority, low income and LEP populations. These standards apply to the fixed route portion of our services and are used to demonstrate that our fixed route services are provided to the general public regardless of race, color, or national origin.

Jefferson Transit Authority measures our fixed route system by using the following service standards:

Vehicle Load

Jefferson Transit East does not assign any particular vehicle to any particular route.

Maximum load factor is the percentage of the "filled to capacity" of the vehicle. Filled-to-capacity is when all the seating and standing capacity of the vehicle is used. An example would be if the bus had 29 seats and a standing capacity of 42 and 50 people were riding in the bus, the Maximum Load Factor at that time would be at 70%

Jefferson's Transit's purpose is to provide safe, reliable public transportation to our riders. The Vehicle Load Factor is monitored regularly to ensure customer comfort and safety and the maximum load factor does not reach 100 percent on any vehicle.

JTA's vehicles currently do not fill beyond seating capacity.

Vehicle Make	Vehicle Type	Passenger Capacities			
		Seating Capacity	Standing Capacity	Standing Capacity Used	Maximum Load Factor
East-End Fleet					
2011 GILLIG LOW FLOOR 29FT	29' Heavy-Duty Small Bus	26	17	0	< 60%
2011 GILLIG LOW FLOOR 35FT	35' Heavy-Duty Large Bus	32	23	0	< 44%
2018 GILLIG LOW FLOOR 35FT	35' Heavy-Duty Large Bus	32	23	0	< 44%
2018 GILLIG LOW FLOOR 29FT	29' Heavy-Duty Small Bus	26	17	0	< 60%
2019 GILLIG LOW FLOOR 29FT	29' Heavy-Duty Small Bus	26	17	0	< 60%
2020 GILLIG LOW FLOOR 29FT	29' Heavy-Duty Small Bus	26	17	0	< 60%
2020 GILLIG LOW FLOOR 35FT	35' Heavy-Duty Large Bus	30	23	0	< 44%
West-End Fleet					
2017/FORD/F550	29' Medium-Duty Truck Chassis-Built Cutaway	20	0	0	< 100%
2013/FORD/F550	31' Medium-Duty Truck Chassis-Built Cutaway	24	0	0	< 100%

Vehicle Headways

Jefferson Transit headways are the hours between each scheduled route.

JTA Routes were not developed to, and in fact do not, differentiate by minority or income status of the areas or passengers served. JTA has no peak times. Each route is unique. Frequency of routes is determined by regional connectivity, population density, traffic congestion, ridership, development activities, and funding.

For the purpose of defining service standards and policies for Jefferson Transit's fixed route service, the agency has split its system into four route categories:

- Local-Routes are designed to carry passengers between major passenger hubs, employment centers, and residential neighborhoods within the city.
- Rural-Radial routes are carry passengers between major passenger hubs and neighboring towns and cities.
- Commuter-Regional Connectors are longer routes designed to carry passengers between the larger populated areas to employment centers and connecting counties.
- Rural-Regional Connector services large portions of the county that are sparsely populated that connect with other counties.

	Weekday					
			Headways per Hour or (Number of Runs)			
Route	Route Name	Type of Run	6 AM to 8 AM	8 AM to 5 PM	5PM to 8 PM	
East J	efferson Transit					
		Rural-Regional				
#1	Brinnon	Connector	1.3	1 (Run)	1 (Run)	
#2	Fort Worden	Local	1	1	1	
#3	Castle Hill/Cook Ave	Local	1 (Run)	1	1	
#4	Upper Sims Loop	Local	-	2	2	
#6a	Tri-Area Loop	Rural-Radial	1 (Run)	1	-	
#6b	Tri-Area Loop	Rural-Radial	-	1	1 (Run)	
		Commuter-Regional				
#7	Poulsbo	Connector	1 (Run)	3 (Runs)*	1 (Run)	
		Commuter-Regional				
#8	Sequim	Connector	1 (Run)	3 (Runs)*	1 (Run)	
#11	PT Shuttle	Local	2	2	2	
West J	lefferson Transit					
		Rural-Regional				
Jefferson Olympic Connection		Connector	1 (Run)	2 (Runs)*	1 (Run)	

	Saturday					
			Headways per Hour or (Number of Runs)			
Route	Route Name	Type of Run	6 AM to 8 AM	8 AM to 5 PM	5 to 8 PM	
East Je	efferson Transit					
		Rural-Regional				
#1	Brinnon	Connector	-	1 (Run)	1 (Run)	
#2	Fort Worden	Local	-	1	1.00	
#3	Castle Hill/Cook Ave	Local	-	1.00	1.00	
#4	Upper Sims Loop	Local	-	2.00	2.00	
#6a	Tri-Area Loop	Rural-Radial	-	1.00	-	
#6b	Tri-Area Loop	Rural-Radial	-	1 (Run)	1 (Run)	
		Commuter-Regional				
#7	Poulsbo	Connector	-	2 (Runs)*	-	
		Commuter-Regional				
#8	Sequim	Connector	1 (Run)	-	1 (Run)	
#11	PT Shuttle	Local	-	2	2	
West Jefferson Transit						
		Rural-Regional				
Jefferson Olympic Connection Connector 1 (Run) 1 (Run) -					-	
* Times	* Times run unequally due to commuting at peak times of travel.					

On-Time Performance

Transit Operators operate their vehicles as close as possible to the established time schedule. Under normal conditions, no vehicle shall depart from any layover later than five minutes beyond the scheduled departure time, but every effort is made to run on time. Transit Operators may request additional wait time from the Dispatcher if they know that there are passengers transferring from a connecting route that is running late. If a Transit Operator is running more than five minutes late due to traffic conditions, weather, mechanical problems or for other reasons, the operator must notify the

Dispatcher. At no point should a Transit Operator leave a time point before the scheduled departure time.

Late times of five minutes or more are recorded by the Dispatcher. This log will be reviewed by the Fixed Route Operations Manager weekly. JTA's goal is ninety (90) percent of JTA's transit vehicles will complete their established runs no more than five minutes late in comparison to the established schedule.

Service Availability

East Jefferson Transit's rural routes and the routes between towns will have stops three-quarters to one mile apart. City and town stops will be two blocks apart. Exceptions may occur due to safety concerns and/or when entering another county.

West Jefferson Transit is a Route Deviated service with Flag stops.

FIXED ROUTE POLICY STANDARDS

Jefferson Transit Authority has developed the following policies to describe how Fixed Route operations are provided to the general public regardless of race, color or national origin.

Vehicle Assignment -

East Jefferson Transit has 8 routes and 14 buses. The buses are assigned a set schedule for each day of the six day work week. Each bus is assigned a minimum of three different routes per day on each of those schedules. On each of these six-scheduled-days, the buses are assigned a different set of routes; therefore, no bus is assigned to a particular route for an entire day or week,-the buses are all rotated. At any time, a bus can be rotated out of its scheduled route, if that particular bus is scheduled to be washed or is out of service.

In the future, Jefferson Transit anticipates adding cutaways to the East Jefferson Transit. JTA plans to incorporate the cutaways into the current rotating schedule.

West Jefferson Transit has one route and four vehicles. On this route JTA uses mediumduty truck chassis-built cutaways. The buses are rotated out to get equal use in mileage. This route covers a distance of 64 miles one-way. The average persons per route is 6.5. A large bus is not necessary on this route and the cutaways are less expensive to run.

Transit Amenities

At this time, Jefferson Transit amenities include bus shelters, waste receptacles and information provisions.

Bus Shelters

When Jefferson Transit receives requests for shelters and simme-seats, the requested locations are placed on a waiting list. Specific requests are given priority based on several factors including: ridership in the area; space available to place a shelter; safety of the location; estimated cost; pedestrian access; wheelchair accessibility; and receiving approval from the proper governmental permitting authority.

The exact costs associated with placing a bus shelter or a simme-seat in a specific location depends on several factors including: right-of-way access; geographic features; location of existing utilities; and the footage and code construction costs in regard to the concrete pad, curb cuts, sidewalks, and ADA accessibility.

It has been JTA's policy not to place bus shelters in residential neighborhoods due to past complaints from property owners regarding visual aesthetics; degradation to their private property; and the negative perception of bus riders and their conduct. Bus shelters are placed in locations with retail, business, and high traffic land use. There are shelters located at or near schools and public buildings throughout the service area.

Based on the above quantitative and qualitative information review for locating bus shelters and simme-seats, JTA attempts to place a shelter or simme-seat at bus stops that have high passenger boarding counts per day with the goal of:

Placing shelters at bus stops with approximately 15 passengers per day Placing simme-seats at bus stops with approximately 10 passengers per day.

Waste Receptacles

All trash cans placed on Jefferson Transit property are maintained by transit staff. Trash cans are not put out by JTA in rural or town areas unless there is an absolute need; i.e., the bus stop becomes littered with refuse. Waste receptacles are emptied weekly.

Provision of information

Printed schedules, route maps & system maps are placed in all bus shelters.

Jefferson Transit's Nondiscrimination Complaint Procedures for Federally Assisted Programs or Activities

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Civil Rights Restoration Act of 1987, and the Americans with Disabilities Act of 1990, relating to any program or activity administered by JTA as to subrecipients, consultants, and contractors.

Intimidation or retaliation of any kind is prohibited by law. The procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible, such as between the parties/individuals named in the complaint. The option of informal mediation meeting(s) between the affected parties and the Coordinator may be utilized for early resolution.

Procedure

- 1. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited by nondiscrimination requirements may file a written complaint with the JTA General Manager. A formal complaint must be filed within 180 days of the alleged occurrence.
- 2. Upon receipt of the complaint, the General Manager will be responsible for notifying the respondent(s) of the complaint within five working days of receipt. Additionally, a copy of the complaint will be forwarded for review by the JTA attorney.
- 3. Complaints filed through Department Heads or Customer Service will be forwarded to JTA's General Manager. All complaints will be logged and tracked on an Excel spreadsheet on JTA's secure server in accordance with WSDOT Consolidated Grant Program retention requirements.
- 4. The General Manager shall be given 15 working days from receipt of the complaint to inform the complainant as to the status of the investigation and/or resolution of the complaint.
- 5. If the complaint is against a subrecipient, consultant, or contractor, the appropriate project manager shall be notified of the complaint within 15 working days of the receipt of the complaint.
- 6. Within 60 working days of the receipt of the complaint, the investigator* will prepare a written report for the General Manager. The report shall include a narrative description of the incident, identification of persons interviewed, a finding, and recommendations for disposition. *This can be JTA's Title VI Coordinator, the Title VI Specialist for a subrecipient of federal funds, or the FTA Title VI Liaison.
- 7. The investigative report and findings of the complaint will be sent to JTA for review and comment by JTA's attorney.
- 8. The recommendation(s) shall be reviewed by the General Manager. The General Manager will discuss the report and recommendations with the JTA Board Chair.
- 9. If the complaint cannot be resolved by the General Manager, the complainant or respondent shall be notified of their appeal rights to JTA's Board of Directors and/or FTA.
- 10. A copy of the complaint and JTA's investigation report will be issued to FTA within 60 days of the receipt of the complaint.
- 11. After receiving FTA's comments, the investigation report will be released and briefings scheduled with all relevant parties.
- 12. If the complainant is not satisfied with the results of the investigation of the alleged discriminatory practice(s), s/he shall be advised of their rights to appeal JTA's decision to the U.S. Department of

Transportation. The complainant has 180 days after JTA's final resolution to appeal to USDOT. Unless new facts not previously considered come to light, reconsideration (appeal) by JTA will not be available.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

Washington State Department of Transportation Public Transportation Division Attn: Title VI Coordinator PO Box 47387 Olympia, WA 98504-7387

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

United States Department of Justice Civil Rights Division Coordination and Review Section – NWB 950 Pennsylvania Avenue NW Washington DC, 20530

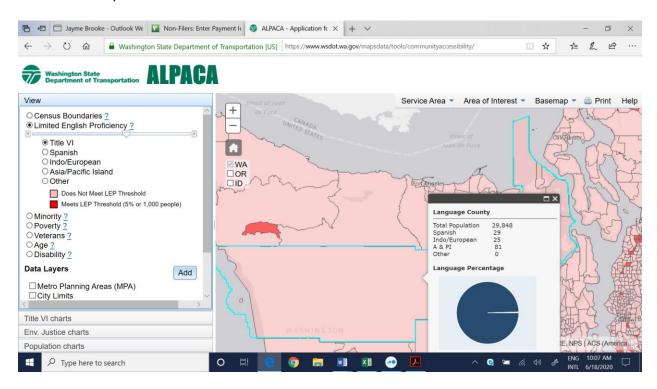
Jefferson Transit Title VI Complaint Form

Name:		
Address:	City	State
Telephone Numbers: (Home)	(Work)	
Email Address:		
Were you discriminated against because of: Race National Origin Other (please describe)		
Are you filing this complaint on your own be	half? Yes No	-
If you answered "no", please supply	the name and relation	ship of the person for whom you are
complaining:		
Have you filed this complaint with any of the Federal agency Federal Cou Local Agency Other Have you filed a lawsuit regarding this comp	rt State Agency	
Please provide information the contact personal state of the conta		
Contact person:	Title:	
Telephone number or Email:		
Date of Alleged Incident:		

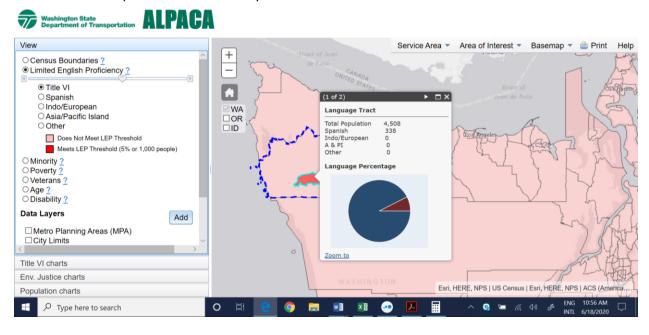
Please explain what happened and how you were discriminated against. You should include specific details such as names, dates, times, route numbers, witnesses, and any information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint. Attach additional page(s) if necessary.
Signature Date:
Please send your completed form to: Jefferson Transit, Title VI Complaint, 63 4 Corners Rd, Port Townsend, WA 98368
or Email to custserv@jeffersontransit.com

ALPACA Title VI LEP Maps

Jefferson County



JTOC route - Start point in Clallam County



Jefferson Transit Authority Title VI Notice to Public

Jefferson Transit Authority (JTA) hereby gives public notice that it is the policy of JTA to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities.

Title VI requires that no person in the United States of America shall, on the grounds of race, color, or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which JTA receives federal financial assistance.

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with JTA. Any such complaint must be in writing and filed with the JTA General Manager within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained from this office at no cost to the complainant by calling (360) 385-4777 or by writing Jefferson Transit Authority, Grants & Procurement Coordinator, 63 4 Corners Rd, Port Townsend, WA 98368.

Additional information regarding JTA's Title VI procedures can also be requested by emailing custserv@jeffersontransit.com or visiting http://jeffersontransit.com.

A complainant may file a complaint directly with the Federal Transit Administration Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor – TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

Please do not remove this posting – Please contact the Grants & Procurement Coordinator for a copy or information.

Jefferson Transit Authority Title VI; Notice to the Public

Non-discrimination Policy and Procedure:

ursuant to Title VI of the Civil Rights Act of 1964, Title II of the Americans with Disabilities, Environmental Justice egulations, and in accordance with applicable state and ocal laws: Jefferson Transit Authority grants all persons equal access to its transportation services. If you believe you have received discriminatory treatment by Jefferson ransit Authority on the basis of your race, color, nation origin, economic status, disability, or limited English proficiency, you have the right to file a formal complaint. The complaint must be filed no later than 180 days after the alleged discriminatory incident.

Jefferson Transit Operations Manager at: 63 4 Corners Road Port Townsend, WA 98368.

For Title VI complaints, ADA complaints and additional information, view Jefferson Transits policies online at http://jeffersontransit.com/about/policies/or contact Jefferson Transit at 1-360-385-4777 or 1-800-371-0497

Public documents and records are available to the public as provided under the Washington State Public Records Act (RCW 42.56). This document may be considered subject to the Public Records Act and may be disclosed to a third-party requestor.

Jefferson Transit Authority Customer Comment Processing

A response is provided within 10 working days if customer contact information is provided on comment form.

All comments are reviewed by Jefferson Transit Management .

Follow up to comments is available to the Jefferson Transit Authority Board for, review



Jefferson Transit 63 4 Corners Road Port Townsend, WA 98368

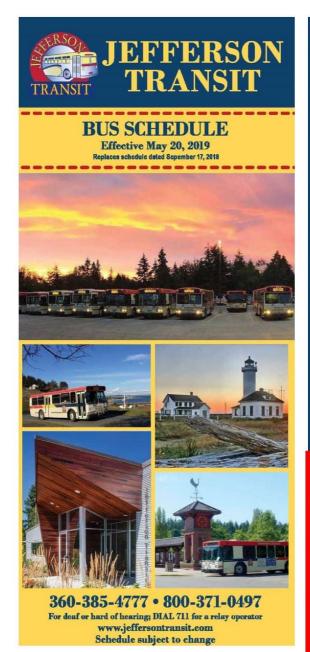




JEFFERSON TRANSIT AUTHORITY



www.jeffersontransit.com custserv@jeffersontransit.com



PASSENGER CODE OF CONDUCT

For the safety and comfort of all, Jefferson Transit Authority requires our customers to:

- · Ride quietly and respect the rights of other passengers
- · Pay the correct cash fare or show a pass when boarding
- · Remain seated while the bus is in motion
- Hold on to a hand rail while the bus is in motion if no seats are available
- Allow transit operators to drive their Vehicles safely
- Keep all beverages in spill-proof containers
- · Refrain from eating on all Jefferson Transit Vehicles
- Not carry hazardous materials while riding on any Jefferson Transit Vehicle
- Keep animals, including pets and service animals, under close control or in a closed container
- Cross behind buses, and wait until after the buses leave to cross the street
- Walk with bikes and carry skateboards at any Jefferson Transit Authority properties
- · Keep aisles free of all items

Violations of RCW 9.91.025 include:

- Using drugs or alcohol, smoking, littering, spitting, possessing strong body odors, playing audible music, swearing, or otherwise behaving in an unruly or harassing manner are all prohibited on all Jefferson Transit Property and vehicles
- Possession of unissued transfer or fare media or tenders an unissued transfer or fare media as proof of payment.

Jefferson Transit will exclude any passenger for not complying with Jefferson Transit Passenger Code of Conduct or the Revised Code of Washington (RCW 9.91.025) which further

Non-Discrimination Policy and Procedure:

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Attachment 7

Jefferson Transit Public Participation Plan

Updated 2020

Purpose

Jefferson Transit intends to ensure the opportunity for participation of a cross section of social, economic, and ethnic interest groups and individuals in development of long- and short-range transit plans.

The purpose of this Public Participation Plan (PPP) is to establish procedures that allow for, encourage, and monitor participation of all residents in the Jefferson Transit Authority service area, including but not limited to low income and minority individuals, and those with limited English proficiency. While traditional means of soliciting public involvement may not reach such individuals, or might not allow for meaningful avenues of input, the intent of this effort is to take reasonable actions throughout the planning process to provide opportunities for participation.

Goals and Objectives for the Public Participation Plan

The goal of the PPP is to offer real opportunities for all residents of Jefferson Transit's service area to participate in the development of the annual Transit Development Plan (TDP), service change planning, and capital and infrastructure improvement planning.

Objectives:

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

Identification of Stakeholders: Stakeholders are those who are either directly, or indirectly, affected by a service change, a plan, or the recommendations of a plan. Those who may be adversely affected, or who may be denied benefit of a plan's recommendation(s), are of particular Interest in the identification of specific stakeholders. Stakeholders are found within several groups, including county residents and visitors, minority and low-income persons, public agencies, and private organizations and businesses.

Demographics (from U.S. Census of 2010)

Jefferson Transit applies the U.S. Census of 2010 for households. The Census 2015 5-Year American Community Survey (ACS) is used for Language purposes only.

As of the U.S. Census of 2010, there were 30,856 people, in 14,239 households, residing in Jefferson County. The <u>population density</u> is 16.6 people per square mile. More than 26% of the population is over 65 years old.

Racial Minority groups make up less than 10 percent of the population in Jefferson County (See Table 1). Persons of Hispanic or Latino origin make up the largest minority, with 2.8 percent of the total population of the county. American Indian and Alaska Native persons account for 2.3 percent. Black and Asian persons account for .8 percent and 1.6 percent of the population, respectively.

Jefferson County has a very small Limited English Proficiency (LEP) population as indicated by census and does not yet meet the threshold of 5% or 1000 LEP people to warrant a written plan

		Percent of
Table 1 Category	Number	Population
Total Population	29,872	100.0
Total one race	28,856	96.6
White	27,184	91.0
Black	239	0.8
American Indian or		
Alaska native	687	2.3
Asian	478	1.6
Hawaiian & Pacific		
Islander	60	0.2
Hispanic or Latino	836	2.8
Other	388	1.3

for a particular language. However, we do plan to find resources needed to provide reasonable and meaningful access to our planning and documents as individuals or groups are identified or indicate interest. There are only 446 people of Limited English Proficiency (LEP) in the county – and they speak a variety of languages from Spanish / Spanish Creole (185 people - 0.6%) to Russian (62 people - 0.2%).

Median income for a household in the county is \$46,048. The <u>per capita income</u> for people in the county was \$28,528. Persons living at or below the poverty level are 13.5 percent of the population.

Methods for Stakeholder Participation

Engaging minority, and low-income and limited English proficiency populations: Participation can be challenging. Language and cultural differences may not be compatible with the more traditional means of engaging the public in the planning process. Jefferson Transit Planning Committees are appointed on an ad hoc basis and staff will make reasonable efforts to engage minority populations using techniques, such as including notations in public notices, providing appropriate non-English languages that will provide a contact where the individual can be informed of the process/project, and will have the opportunity to give input. Focus groups may also be established for the purpose of gaining input from a particular defined portion of the community.

While low-income individuals may have access to all of 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 either directly or indirectly from this portion of the population Include focus groups, informal interviews, and agency/advocacy group contacts. Also, advocacy groups can be a good resource for contacts and dissemination of information to minority and low-English proficiency populations. Such advocacy groups or agencies can have insight into the needs of the under-represented populations, as well as providing valuable contacts or arenas for input. An account with LanguageLine Solutions has been set up for translations.

Some of the techniques that can be used to engage the general population are public notices of meetings in the local newspaper, and open house format public information meetings. While these techniques will continue, Jefferson Transit staff will make a greater effort to engage the general public, using outreach techniques such as hosting a transit information booth at the Port Townsend Farmers' Market and at the Jefferson County Fair.

Public Agencies: Public agencies can provide valuable input to the planning process, in addition to assisting 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 minorities, low-income, and limited English proficiency households. These agencies have great Insight into the transportation needs of their clients and are useful partners in overcoming difficult barriers that may not be understood by professionals dealing more distinctly with the provision of transportation services.

Private Organizations and Businesses: Private organizations and businesses offer a number of perspectives that are valuable to the planning process. Often, transportation for employees is of critical concern to private sector employers. For that reason, representation of private business interests will be welcomed in the planning process.

A notice will be posted in the local newspaper and stakeholders will be notified regarding the following: programs of projects to be developed, raising of fares or any major reduction in transportation service.

Public involvement is important at all stages of plan development. Opportunities for participation for both users and nonusers of the Jefferson Transit System will be available.

A public input/comment period on the draft TDP plan will be scheduled during the summer months, prior to the September 1 adoption date required by RCW 35.58.2795. Public notice will be posted in the local newspaper of record. Other stages of the planning process, such as reviewing draft documents and mapping, are more conducive to other techniques. Documents will be available for review at the Jefferson Transit Office, located at 63 4 Corners Road, Port Townsend and on the jeffersontransit.com website. If materials are requested in Spanish, large type and/or Braille, staff will make a reasonable attempt to accommodate those needs.

Additional Outreach Efforts

In addition to the outreach efforts Identified earlier in this policy, staff will use the following techniques during its planning studies, as deemed appropriate by Jefferson Transit staff and ad hoc committees:

- Presentations to professional, citizen, and student organizations.
- Articles in community newsletters.
- Press releases and meetings with local media representatives.
- Informal conversations with individuals and small groups.
- Interviews with people who are or could be affected by study recommendations.
- Presentations by experts on various transit-related subjects.
- User and non-user surveys.
- Use various illustrative visualization techniques to convey the information including but not limited to charts, graphs, photos, maps and the internet.

Other techniques will be examined to determine the best methods of involving all segments of the service area population in the planning process.

Methods of Addressing Comments: Comments will be documented and presented to decision-

making bodies and modified in the contents of the document as necessary and will be included in the appendices of planning products after they are approved and published. Comments received after studies and other planning products are completed and approved will be documented and referenced when amending or updating the planning products in the future.

Responses to Information Requests and Comments: Information can be requested in person at Jefferson Transit Headquarters or by phone, fax, email, and U.S. mail. Availability of Planning Documents, hard copies of draft and completed plan documents, will be available at the Jefferson Transit Office at 63 4 Corners Road, Port Townsend, WA 98368. Phone: 360-385-4777. Electronic versions of documents will be available on the Jefferson Transit website at www.jeffersontransit.com.

Jefferson Transit Interacts through Board seats or regular contact with the following agencies:

- DASH (Disability Awareness Starts Here Group)
- Department of Health & Social Services-
- > Jefferson County Council of the Blind
- Jefferson County School Districts
- > Jefferson County Winter Shelter (Community Outreach Assn. Shelter Team)
- Jefferson Transit Authority Board (includes all 3 County Commissioners & 2 Port Townsend City Council members)
- Non-Motorized Transportation Advisory Board-City of Port Townsend
- Olympic Area Agency on Aging
- Olympic Community Action Program
- Peninsula Housing Authority
- Port Townsend, Tri-Area Food Banks
- Safe Harbor Center Beacon of Hope
- Skookum Contract Services
- Olympic Peninsula Transit CEO's
- Climate Action Committee

Jefferson Transit Authority Review of Public Participation

2019-2020



Prepared by: Jayme Brooke, Grants and Procurement Coordinator

Jefferson Transit Authority
63 4 Corners Road
Port Townsend, WA 98468
360-385-3020

www.jeffersontransit.com

Introduction

Jefferson Transit's Public Participation Plan was adopted in 2012. The purpose of the plan was "to establish procedures that allow for, encourage and monitor participation of all residents in the Jefferson Transit System service area" including those individuals who may not have been reached by traditional means of soliciting public comment.

This report highlights Jefferson Transit's ongoing actions to provide opportunities for public participation and commitment to the community.

Comprehensive Plan

In 2019, Jefferson Transit began the process of developing a new Long-Range Comprehensive Plan by retaining the firm Fehr & Peers to aide in this process. This plan will provide a 20 year planning strategy for the future of Jefferson Transit. A large part of developing this document involves outreach to the community, including input from current ridership and non-riders. In January 2020, Jefferson Transit with Fehr & Peers hosted a meeting at the Cotton Building in downtown Port Townsend to gather input from the community to help focus the direction of the future of Jefferson Transit. Public surveys were distributed on paper at the event, posted to the long-range plan website, supplied to ridership on buses, and available at the customer service desks.

Community Outreach

In 2019 Jefferson Transit staff interacted with the public at community sponsored events. Staff set up booths with materials designed to encourage patrons to ride transit, answered questions regarding transit service and logged visitors' comments. Event participation included:

<u>Jefferson County Fair</u>



2019	738 visitors
2018	517 visitors
2017	625 visitors

Staff manned the transit booth at the 2019 county fair August 9th, 10th and, 11th. Décor focused on vanpool information, environmental benefits of riding the bus, information on the new Jefferson Transit operational facility and free parking at the Haines Park and Ride.

Due to the COVID-19 Pandemic the 2020 Jefferson County Fair was cancelled.

Farmers Market



Jefferson Transit hosted an information booth at the Port Townsend Farmers Market five Saturdays in 2019. The Farmer's Market supports Jefferson Transit by graciously allowing the agency to host a booth at no cost when space is available.

Supporting Military Service Members and Their Families

Veterans Stand Down



Jefferson Transit provided fare free rides to veterans attending the Veterans Stand Down events in Forks, Port Townsend and Port Angeles.

2019	Hosted booth	27 visitors
2018	Hosted booth	33 visitors

Hadlock Block Party



Jefferson Transit participated in the annual Hadlock Block Party in 2019. Route/transfer information, bus schedules, and connection schedules and Jefferson Transit promotional items including "green" re-usable shopping bags, clip on safety lights and reflectors, JTA notepads and pens, lanyards and pass holders were provided.

Due to the COVID-19 Pandemic, the 2020 Hadlock Block Party was cancelled.

Additional Community Participation

Rhododendron Parade



Jefferson Transit participated in the 2019 Rhododendron Parade (pictured). Due to the COVID-19 Pandemic, the 2020 Rhododendron Parade was cancelled.

Wooden Boat Festival Haines Place Park and Ride



2019 saw record ridership on the Wooden Boat Festival Shuttle with 4979 riders over the course of the festival versus an average of 4090 over the previous two years.

Due to the COVID-19 Pandemic, the 2020 Wooden Boat festival was held remotely, eliminating the need for Jefferson Transit to provide shuttle services for festival attendees.

Port Townsend Kiwanis and Toys for Tots



Jefferson Transit partnered with the Port Townsend Kiwanis in collecting toys for the U.S. Marine Corps Toys for Tots program. The event was promoted through press releases and posters on transit vehicles. Jefferson Transit staff and Kiwanis volunteers collected toys on Saturday, December 6th. The toys collected were donated to the local Christmas for Children

program.

Community Meetings/Memberships

General Manager, Tammi Rubert and Fixed-Route Operations Manager, Nicole Gauthier, are board members and members of regional committees to represent Jefferson Transit:

Memberships include: Climate Action Committee (John Bender-Board member), Sunrise Rotary, (Tammi-member), Peninsula Regional Planning Organization (Tammi-member), Olympic Peninsula Transit CEO's, DASH (Disability Awareness Starts Here, Tammi-member)

DASH (Disability Awareness Starts Here, Miranda Nash-Board member), Jefferson County Council for the Blind (Nicole-member).

Ridership Surveys

Multiple surveys of ridership were performed in 2019 and 2020. One survey was conducted by Fehr & Peers pertaining to the development of Jefferson Transit's Long Range Plan and asked questions regarding frequency of use, destinations, and barriers to using transit. Another survey was performed by Operations Manager at the beginning of the COVID-19 Pandemic and contained questions about thoughts on bus sterilization, cleanliness, and comfort level of riding transit during a pandemic.

Jefferson Transit Authority Board Meetings

Jefferson Transit Authority Board Meetings were held bi-monthly in 2019 and 2020. Notices of public meetings were posted in local newspapers and on Jefferson Transit's website. After March 2020, with the advent of the COVID-19 Pandemic, Jefferson Transit's Authority Board meetings were held virtually via GoToMeeting. Links to Authority Board meetings are posted on jeffersontransit.com and flyers posted on buses and at 63 4 Corners Road and 440 12th Street.

Overview

In 2019 Jefferson Transit offered opportunities for the public involvement by: hosting transit booths at public events, conducting public meetings, advertising in local newspapers notifications of public meetings, staff memberships in local community organizations, surveying transit customers, one on one meetings with general manager when requested by customers, availability of public comment through Jefferson Transit's website, by mail or by telephone.

In 2020, during the COVID-19 Pandemic Jefferson Transit offered opportunities for public involvement by: participating in public events which held to stringent standards of masking and social distancing, conducting public meetings virtually, advertising in local newspapers notifications of virtual public meetings, continued staff memberships in local community organizations meeting virtually, surveying transit customers, and availability of public comment through Jefferson Transit's website, by mail or by telephone.