

Worcester Regional Transit Authority (WRTA)

***Public Outreach Program
For Fare and Service Changes***

July 2014



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**Public Outreach Program
For Ongoing Transit Planning Activities
For Major Service and Fare Changes**

BACKGROUND

1. WRTA

The Worcester Regional Transit Authority (WRTA) was created in September 1974, pursuant to the provisions of Chapter 161B of the General Laws of the Commonwealth of Massachusetts. The WRTA is given general responsibility to develop, finance, and contract for the operation of mass transportation facilities and services within its territory. The day-to-day affairs of the WRTA are managed by the Administrator who is appointed by the WRTA Advisory Board. The WRTA Advisory Board consists of:

- The City Manager of Worcester or Mayor of each city.
- The Chairman of the Board of Selectmen of each town having such board, or the Town Manager or Town Administrator of each town.
- Advisory Board members may appoint designees to act on their behalf.

2. TITLE VI Requirements

Title VI of the Civil Rights Act of 1964 states that “no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance.” All federal agencies which provide financial assistance for any program are authorized and directed by the United States Department of Justice to apply provisions of Title VI to each program by issuing applicable rules, regulations, or requirements.

The WRTA’s current Title VI Notice reads as follows:

Notifying the Public of Rights Under Title VI

The Worcester Regional Transit Authority (WRTA) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Worcester Regional Transit Authority.

For more information on the Worcester Regional Transit Authority’s civil rights program, and the procedures to file a complaint, please contact 508-453-3462; email csfeedback@therta.com; or visit our Customer Service Center at 60 Foster Street, Worcester MA 01608 between the hours of 7:00am to 8:00pm Monday-Friday or Saturday 9:00am to 5:30pm.

This notice will be reviewed periodically and will be updated as required by current USDOT, US DOJ and MassDOT’s Office of Diversity and Civil Rights (ODCR).

3. *Environmental Justice Requirements*

Executive Order 12898, issued in 1994, expanded the impact of the 1964 Civil Rights Act and responded to the concern that everyone within the United States deserves equal protection under the country's laws; thus the concept known as "environmental justice" was developed. The Executive Order organized and explained in detail the Federal government's commitment to promote environmental justice. Each Federal agency was directed to review its procedures and to make environmental justice part of its mission by identifying and addressing the effects of all programs, policies, and activities on minority populations and low-income populations.

The U.S. Department of Transportation issued its DOT Order to Address Environmental Justice in Minority Populations and Low-Income Populations in 1997. As partners of DOT, Regional Transit Authorities are expected to embrace the principles of environmental justice as well. The USDOT Order states, in part, that *"In undertaking the integration with existing operations ...DOT (and by extension Regional Transit Authorities) shall observe the following principles:*

- (1) *Planning and programming activities that have the potential to have a disproportionately high and adverse effect on human health or the environment shall include explicit consideration of the effects on minority populations and low-income populations. Procedures shall be established or expanded, as necessary, to provide meaningful opportunities for public involvement by members of minority populations and low-income populations during the planning and development of programs, policies, and activities (including the identification of potential effects, alternatives, and mitigation measures).*
- (2) *Steps shall be taken to provide the public, including members of minority populations and low-income populations, access to public information concerning the human health or environmental impacts of programs, policies, and activities, including information that will address the concerns of minority and low-income populations regarding the health and environmental impacts of the proposed action.*

4. *Limited English Proficiency Requirements*

Executive Order 13166, issued in 2000, also expanded the impact of the 1964 Civil Rights Act and responded to the concern that persons with limited English proficiency deserve equal participation in the transportation planning process. In accordance with the Executive Order, the U.S. DOT issued *Policy Guidance Concerning Recipient's Responsibilities to Limited English Proficient (LEP) Persons*, which is modeled after the U.S. Department of Justice's general LEP policy guidance document. As described in the guidance, DOT recipients are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. The guidance applies to all DOT funding recipients, which include Regional Transit Authorities.

The US DOT guidance outlines four factors recipients should apply to the various kinds of contacts they have with the public to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to people's lives.
4. The resources available to the recipient and costs.

The WRTA completed its first *Limited English Proficiency (LEP) Implementation Plan* in April 2011. This plan was slightly revised in October 2012. The plan's goal is to ensure that people who are Limited English Proficient (LEP) have meaningful and convenient access to the benefits, services, and information provided by the WRTA's transit programs and related activities and that the steps outlined in the plan are coordinated with this Public Outreach Program.

SPECIFIC CRITERIA FOR PUBLIC OUTREACH PROGRAMS

In compliance with *49 CFR Section 21.5(b)(2)*, *49 CFR Section 21.5(b)(7)*, *Appendix C to 49 CFR part 21*, and *FTA Circular C 4702.1A*, the following addresses specifics associated with the WRTA's public participation process.

- a. *Providing adequate public notice of public participation activities and time for public review and comment at key decision points, including but not limited to a reasonable opportunity to comment on the proposed service or fare changes.*

Public notices will be published in the regional newspaper, the *Worcester Telegram & Gazette* and notices sent via email as to when meetings will occur and when proposed service or fare changes may take effect. Direct mailings of notices will be sent to the following:

- WRTA Advisory Board
- Regional Board of Selectmen Chairs
- Regional City/Town Managers
- Regional State Legislators
- Central Massachusetts MPO (CMMPO) and CMMPO Advisory Committee
- Interested Individuals and Private Transportation Providers (who ask to be placed on mailing list)
- Environmental Justice and environmental stakeholders
- Town Clerks

Other outreach methods used by the WRTA include the following:

- Television/Radio
- Newspapers (Regional and community)
- Internet/Social Media/Mobile Technology
- Public Meetings/Workshops
- Community Meetings
- Variable Message Signs
- Posters, Flyers and Notices
- Staff Involvement
- Bus Schedules
- Telephone Information Center

The WRTA Advisory Board has endorsed a minimum public comment period of 28 days for any significant service and/or fare changes. The WRTA Advisory Board will consider all comments received at the time of their regular monthly meeting, recognizing there may be some circumstances when the full comment period is not complete, before making a recommendation for endorsement. The WRTA Advisory Board will condition their endorsement of service and/or fare changes on any additional public input received if the official review and comment period has not been completed.

In compliance with the *WRTA's Limited English Proficiency (LEP) Implementation Plan*, Posters, Flyers and Notices (aka "car cards") are placed on all WRTA fixed-route buses and in bus shelters in both English, Spanish and Vietnamese. Further, these same notices are placed on the WRTA's website which has the ability to be translated into various languages through Google Translate. Lastly, public participation information, and the ability to provide feedback, is also available through the WRTA's Customer Service Office, which employs staff who speak English, Spanish and Portuguese.

b. Providing timely notice and reasonable access to information about WRTA issues and processes

Early in the process of developing fare or service changes, WRTA staff defines an all-encompassing schedule of public activities, appropriate to the significance and type of change proposed.¹ The schedule is published in the regional newspaper, as well as being sent to those included on the WRTA's regional mailing lists, email lists, and is posted on its website. Prior to scheduled public meetings, press releases are sent to all local newspapers for publication at least one week prior to the established meeting date.

¹ The WRTA generally considers it to be a significant change if 1) there is a change in fare, 2) there is more than a 25% change in the route miles of a specific route, or 3) headways are adjusted more than 5 minutes peak or 15 minutes non-peak.

Copies of materials related to service and/or fare changes will be made readily available for viewing on the website or will be available at the WRTA's main office and Customer Service Office during normal business hours. Notification of draft amendments thereto, which are subject to the public participation process, will, at a minimum, be published in the regional newspaper, posted on the WRTA website and posted on all WRTA buses and shelters.

The WRTA uses the public involvement process adopted by the Central Massachusetts MPO (CMMPO) for the development of the Transportation Improvement Program (TIP) which satisfies the public hearing requirements that pertain to the development of the Program of Projects for regular Section 5307, Urbanized Area Formula Program, grant applications including the provision for public notice and the time established for public review and comment. For FTA projects that are not routine (e.g. Section 5307 applications that require an environmental assessment or an environmental impact statement), the public involvement provided herein for TIP review is not sufficient. Additional public involvement, as presented in the joint FHWA/FTA environmental regulations, 23 CFR part 771, will be required by FTA for grant approval.

c. *Employing visualization and data gathering techniques to describe service and/or fare changes*

Visualization techniques will be tailored to the expected audience and related to the service and/or fare changes that are being prepared and/or discussed. Examples of visualization techniques include, but are not limited to, maps, simulated photos, videos, computer modeled images, interactive GIS systems, and drawings. Examples of data gathering techniques include ridership surveys, passenger counts and on-time performance. In Spring 2012, the WRTA completed a Customer Service Survey which provided a wealth of information to gauge rider's viewpoints and obtain feedback on transit performance. The survey was provided in English, Spanish and Vietnamese versions and the results of the survey are included in Appendix A of the most recent *Limited English Proficiency (LEP) Implementation Plan*.

d. *Making public information (technical information and meeting notices) available in electronically accessible formats and means, such as the World Wide Web, and to those persons with Limited English Proficiency*

The WRTA has recently updated its website to make it more "user-friendly" and to be able to display more information than it can now. This new website includes all current WRTA bus schedules and maps for download, information on elderly and disabled service and fares, meeting notices, and a specific subpage to describe the roles and duties of the WRTA. In addition, the website includes an option for the reader to convert the information into various languages through Google Translate. Information provided through this method is effective, particularly with

the increased use of mobile technology and the WRTA's new text messaging system through its investment in real-time data technology on its buses. As technology continues to change, the WRTA will stay current to keep up with the most effective ways to disseminate information through changing technology.

e. *Holding public meetings at convenient and accessible locations and times*

Open public meetings will be held in the WRTA's district (see Figure 1) at times when public input and participation would likely be greatest. All meetings will be held in ADA-compliant locations that are accessible to all persons and that are accessible via transit. Further, the WRTA will use language interpreters (upon request) for meeting(s). Any request for interpretation services by a WRTA passenger would be clearly identified on information made public through the efforts outlined on pages 5 and 6 of this document.



Figure 1
Map of WRTA District

f. *Demonstrating explicit consideration and response to public input received during the development of fare and/or service changes*

All written public correspondence submitted to the WRTA throughout the development of the fare and/or service change processes, either directly or through the mail, will be considered, reflected upon and kept on file. WRTA staff's response to comments will also be sent directly to the commenter and kept on file.

- g. *Seeking out and considering the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households, who may face challenges accessing employment and other services*

The WRTA has historically made a concerted effort to involve the region's disabled, elderly, low-income, minority and limited-English speaking populations. A number of advocacy groups serving these populations are included on the Elderly and Disabled Technical Task Force. These advocacy groups distribute transportation planning materials to their associates, including local community organizations. Participants include the Massachusetts Rehabilitation Commission, the Worcester Office of Elder Affairs, the (Worcester) City Manager's Executive Office of Human Resources, the Age Center of the Worcester Area, Worcester Elder Home Care, the Seven Hills Foundation, and the Massachusetts Commission for the Blind. Relationships with additional advocacy groups representing low income and minority populations are currently being broadened to build on efforts conducted in the past.

When service and/or fare changes are identified by staff as having the potential to impact communities of environmental justice concern, staff will encourage project proponents to use additional effective and efficient outreach, which may include (but not be limited to) such measures as: the use of multi-lingual radio announcements on radio stations targeting the impacted communities, multi-lingual notices in newspapers circulated widely within the impacted communities, announcements in newsletters of community-based organizations serving the impacted communities, and notices to neighborhood organizations serving the impacted communities.

In an effort to facilitate this additional notice, the WRTA will make every effort to maintain a comprehensive contact list of social service agencies, media outlets, community-based organizations, and neighborhood organizations serving environmental justice communities throughout the region.

A recent example of the effectiveness of this outreach was for the new Scheidt and Bachmann fare box conversion in March/April 2012. During this two month period, the WRTA and its operating contractor held over 10 public meetings in various locations such as elderly housing complexes, community/neighborhood centers and EJ neighborhoods to familiarize passengers with the new fare structure and the new fare box that went into operation on April 30, 2012.

Further, the Customer Service Office has reached out to community-based and neighborhood organizations to broaden outreach efforts in an effort to educate the public about the WRTA and the services it provides. As an example, a series of informational meetings were held at the Worcester Senior Center specifically with Vietnamese elders to explain/educate them about the WRTA's fixed-route and paratransit services. The Senior Center was chosen as the venue because they employ a staff member who speaks Vietnamese and could provide clarification and translation services.

- h. Providing an additional opportunity for public comment, if the final service and/or fare changes differ significantly from the version that was made available for public comment by the WRTA*

Should the need arise to substantially revise or amend service and/or fare changes following the close of the initial 28-day public comment period following WRTA Advisory Board endorsement, the WRTA is committed to advertising a notice of the proposed amendments in the regional newspaper and scheduling an additional public meeting followed by the mandated 15-day comment period. Copies of the amendment text will be readily available for public viewing and acquisition at the WRTA's office. Similar to the process previously described, all public comments submitted to the WRTA during the 15-day comment period will be considered.

- i. Coordinating with the statewide transportation planning public involvement and consultation processes, as well as with agencies and officials responsible for other planning activities*

The public involvement process, as defined in this document, shall be closely coordinated with the public involvement processes developed by state and local agencies in regards to transportation operations, economic development, environmental protection, and community development. The WRTA will make available to these agencies all pertinent materials and will consult with them, to the maximum extent practicable, on such planning activities. In addition, the WRTA will assist these agencies in scheduling and conducting joint WRTA/state agency outreach meetings which may be held within the region.

As a voting member of the CMMPO since 1976, the WRTA has closely coordinated with the MPO on transportation planning public involvement and consultation, particularly with the development of the Regional Transportation Plan (RTP), Transportation Improvement Program (TIP) and Unified Planning Work Program (UPWP).

- j. Periodically reviewing the effectiveness of the procedures and strategies contained in the participation plan to ensure a full and open participation process*

Through the WRTA Advisory Board, the WRTA is committed to reviewing its Public Outreach Program on an annual basis in order to implement any necessary refinements that may be needed based on technology improvements, changes in Federal or State regulations and/or recommendations for best practice. The tools used to evaluate the effectiveness of the public outreach procedures and strategies are: customer feedback and the Customer Service Survey, which includes questions related to outreach.