

Central Oklahoma Transportation & Parking Authority

Title VI Program

April, 2019





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Data collection and reporting requirements for Federal Transit Administration (FTA) Recipients under

Title VI of the 1964 Civil Rights Act

Submitted in Compliance with: FTA Circular 4702.1B (effective October 1, 2012)

by

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INTRODUCTION

This document contains information regarding transit services administered by the Central Oklahoma Transportation and Parking Authority (COTPA, dba EMBARK) and is intended to document compliance with Title VI of the 1964 Civil Rights Act. In accordance with FTA Circular 4702.1B, various data, assurance statements, maps, and transit-related information are provided specifically to the COTPA fixed-route bus network to serve as the agency's Title VI Program.

Agency profile

COTPA is a public trust of the City of Oklahoma City and the major public transportation provider within the Oklahoma City metropolitan area. COTPA is the urbanized area's designated recipient of FTA funding.

The COTPA bus system, known as EMBARK, operates a 21-route bus system that provides bus service in Oklahoma City, Midwest City, and unincorporated Oklahoma County and commuter express service between Oklahoma City and Norman. COTPA provides fixed-route bus service Monday through Sunday and operates a fleet of 49 buses during peak service. Increased local funding commitments in recent years have allowed EMBARK to add new weeknight service and Sunday service. EMBARK bus service is currently funded by Oklahoma City and through annual service agreements with Midwest City and Oklahoma County (for service to and from Spencer).

In addition to fixed-route service, COTPA provides EMBARK Plus complementary paratransit services as required by the Americans with Disabilities Act (ADA). Several additional COTPA-sponsored programs are provided to assist the elderly, persons with low income and persons with disabilities with their transportation needs. These programs include EMBARK Plus, Share-A-Fare discount taxi fares, Supplemental Transportation for Elderly and Disabled Persons (STEP), Congregate Meal Program, Interim Senior Transportation, the Daily Living Center, Helpline, Social Service Programs, Senior Companion Program, Non-emergency Medical Transportation, and the Retired Senior Volunteer Program (RSVP).

COTPA also operates Oklahoma River Cruises (passenger ferry service), Spokies Bike Share, and the Oklahoma City downtown streetcar which opened in December 2018.

COTPA's planning activities are included in the Association of Central Oklahoma Governments' (ACOG) Unified Planning Work Program (UPWP), which is adopted annually. ACOG serves as the Metropolitan Planning Organization (MPO) for the Oklahoma City metropolitan area. Capital, operating and planning activities are also reflected in various COTPA plans on the EMBARK website, www.embarkok.com, and in ACOG's short-range Transportation Improvement Program (TIP) and Metropolitan Transportation Plan (MTP).



GENERAL REPORTING REQUIREMENTS

Title VI notice to the public:

COTPA posts notice to the public of its rights under Title VI on its buses, paratransit vans, streetcar vehicles, downtown transit center, various notice boards, and website.

The posted notice is published in English, Spanish, Vietnamese, and Chinese, which are the most frequently spoken languages COTPA's service area per the Limited English Proficiency (LEP) populations analysis.

See Figure 1 for the language in the notice and Figure 2 for the posted notice.

Figure 1: Title VI Notice to the Public - Language

Notifying the Public of Rights under Title VI

Central Oklahoma Transportation & Parking Authority (COTPA)

- COTPA operates its programs and services without regard to race, color, and national origin in accordance with the American's with Disabilities Act (ADA) and the Title VI of the Civil Rights Act. If you believe you have been wronged by any unlawful practice as outlined under ADA and Title VI, you may submit a written complaint to COTPA at COTPA Title VI Officer, 2000 S. May Avenue, Oklahoma City, OK 73108.
- For more information on COTPA's complaint processes and forms, visit our website: https://embarkok.com/about/rights
- If you need information in another language, contact 235-7433



Figure 2: Title VI Notice to the Public

TITLE VI NOTICE TO THE PUBLIC

Notifying the Public of Rights under Title VI

Central Oklahoma Transportation & Parking Authority (COTPA)

- COTPA operates its programs and services without regard to race, color, and national origin in
 accordance with Title VI of the Civil Rights Act. If you believe you have been wronged by any
 unlawful discriminatory practice under Title VI, you may file a written complaint with COTPA at
 COTPA Title VI Officer, 2000 S. May, Oklahoma City, OK 73108.
- For more information on COTPA's Title VI complaints procedure and form, visit our website http://www.embarkok.com/titlevi.
- If you need information in another language, contact 235-7433.

Notificación al público sobre los derechos en virtud del Título VI

Central Oklahoma Transportation & Parking Authority (COTPA)

- La Autoridad Central de Transporte y Estacionamiento de Oklahoma (Central Oklahoma Transportation and Parking Authority, COTPA) administra sus programas y servicios sin distinción de raza, color ni nacionalidad conforme al Título VI de la Ley de Derechos Civiles. Si considera que ha sido perjudicado a causa de algún acto discriminatorio ilegal en virtud del Título VI, puede presentar una demanda por escrito ante la COTPA enviándola a COTPA Title VI Officer, 2000 S May, Oklahoma City, OK 73108.
- Si desea obtener más información acerca del formulario y los procedimientos de demandas del Título VI de la COTPA, visite nuestro sitio web http://www.embarkok.com/titlevi.
- Si desea obtener la información en otro idioma, llame al 235-7433.

Thoâng Baùo Quyeàn Haïn cuûa Coâng Chuùng theo Töïa Ñeà VI Cô Quan Vaän Chuyeån vaø Ñaäu Xe Trung Taâm Oklahoma

Central Oklahoma Transportation and Parking Authority (COTPA)

- COTPA hoaït ñoäng chöông trình vaø dòch vuï cuûa cô quan vôùi chuû tröông khoâng phaân bieät saéc toäc, maøu da, vaø nguoàn goác quoác gia theo Töïa Ñeà VI cuûa Luaät Daân Quyeàn (Civil Rights Act). Neáu tin raèng mình bò ñoái xöû khoâng ñuùng theo baát cöù haønh ñoäng kyø thò baát hôïp phaùp naøo theo Töïa Ñeà VI, quyù vò coù theá noäp ñôn khieáu naïi vôùi COTPA taïi COTPA Title VI Officer, 2000 S May, Oklahoma City, OK 73108.
- Ñeá bieát theâm thoâng tin veà theá thöùc vaø laáy maãu khieáu naii veà Töia Ñeà VI cuûa COTPA, vieáng trang maing cuûa chuùng toâi taii http://www.embarkok.com/titlevi.
- Neáu quyù vò caàn thoáng tin baèng ngoân ngöö khaùc, xin lieân laïc 235-7433.

告知公众《第六篇》下的权利 中央俄克拉荷马州交通和停车管理局

Central Oklahoma Transportation and Parking Authority (COTPA)

- COTPA 根据《〈民权法〉第六篇》管理其计划和服务,不会因种族、肤色和原国籍而区别对待任何人。如果您认为,根据《第六篇》,您受到任何非法歧视性做法的无理对待,可向 COTPA 提交书面申诉,地址为 COTPA Title VI Officer, 2000 S May, Oklahoma City, OK 73108。
- 如需有关COTPA《第六篇》申诉程序和表格的更多信息,请浏览我们的网站 http://www.embarkok.com/titlevi。
- 如您需要其他语言版本的信息,请致电 235-7433。

LAST UPDATED 01/16



Title VI complaint procedures

Any person who believes he or she has been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with EMBARK. Title VI complaints must be in writing and filed with EMBARK within 180 days following the date of the alleged discriminatory occurrence.

To make a formal Title VI complaint, individuals should complete and submit the Title VI complaint form available through contacting EMBARK Customer Service or for download via the EMBARK website:

https://embarkok.com/assets/files/policy/Title%20VI%20Complaint%20Form 16.pdf

All complaints must be in writing and signed by the complainant or his/her representative before action can be taken. Complaints shall state, as fully as possible, the facts and circumstances surrounding the alleged discrimination. Title VI complaints can be filed via the following methods:

Delivery/Mail: EMBARK

Title VI Officer

2000 S. May Avenue Oklahoma City, OK 73108

Fax: 405-316-2104

Email: embarkok@okc.gov

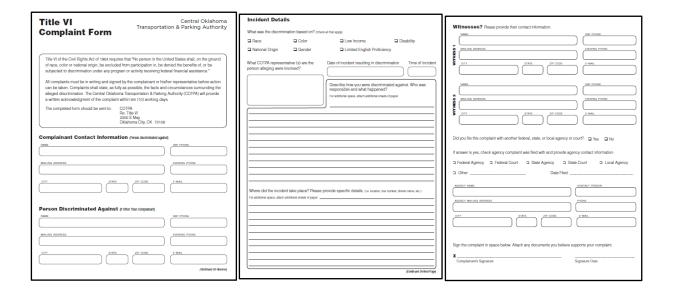
COTPA investigates complaints received no more than 180 days after the alleged incident. COTPA will process complaints that are complete. Within ten (10) working days, COTPA will provide the complainant or his/her representative with a written acknowledgment that COTPA has received the complaint. Upon completed investigation, COTPA will provide the complainant or his/her representative written notice of complaint resolution.



Title VI complaint form

COTPA's Title VI Complaint form is in **Appendix A**, with reduced representative images below.

Figure 3: Title VI Complaint Form





Title VI Investigations, Complaints, and Lawsuits

Following is a table summarizing Title VI complaints received by COTPA from April 2016 – March 2019:

Figure 4: Title VI complaints (April 2016 – March 2019)

Occurrence	EMBARK Complaint Number	Date	Complaint Summary	Action Taken	Status
1	3790	5/4/2016	Customer told they couldn't drink water at the transit center; claimed it was due to race.	No finding	Closed
2	3923	6/22/2016	Customer claimed a bus stop was removed because of discrimination.	No finding	Closed
3	4080	7/1/2016	Complaint of discrimination	No finding	Closed
4	4180	7/30/2016	Customer complained the bus passed them because of discrimination	No finding	Closed
5	4443	7/30/2016	Customer complained of discrimination when asked to get off the bus	No finding	Closed
6	4561	10/26/2016	Customer complained of discrimination when asked to leave the transit center	No finding	Closed
7	4562	11/10/2016	Customer complained of discrimination when asked to leave the transit center	No finding	Closed
8	4658	11/28/2016	Customer complained of discrimination when boarding the bus	No finding	Closed
9	4702	12/9/2016	Customer complained of mistreatment on paratransit bus	No finding	Closed
10	4845	2/6/2017	Customer complained a driver was discriminatory to them when boarding the bus	No finding	Closed
11	5944	11/20/2017	Customer complained they were discriminated against and not allowed to board the bus	No finding	Closed
12	6239	3/8/2018	Customer complained other customers mistreated him because of his race	No finding	Closed
13	6544	6/15/2018	Customer complained of being treated differently and bullied on the bus because of their race	No finding	Closed
14	6623	7/3/2018	Customer complained they were asked to get off the bus because of discrimination	No finding	Closed
15	6667	7/10/2018	Customer complained they were asked to get off the bus because of discrimination	No finding	Closed
16	6702	7/10/2018	Customer complained of mistreatment upon boarding the bus	No finding	Closed
17	7045	10/30/2018	Customer complained driver harassed another customer while on the bus that caused them to get off the bus	No finding	Closed



PUBLIC PARTICIPATION PLAN, including information about outreach methods to engage minority and limited English proficient populations (LEP), is included as a separate plan in **Appendix I** and a summary of public outreach efforts is included in **Appendix G**.

Language Assistance Plan

COTPA's LEP Plan is a critical tool for serving the mobility needs of the diverse service area, including those who do not speak English well. The latest COTPA on-board passenger survey revealed that seven percent (7%) of respondents indicated they speak English "not well at all" and an additional eleven percent (11%) indicated they speak English "less than well." Providing language assistance in a targeted manner helps attract new riders and ensure that COTPA's services are accessible, convenient, and safe to LEP persons in the community.

COTPA's 2016 LEP Plan is in **Appendix B**. Review of more recent U.S. Census American Community Survey (ACS) data, and onboard passenger surveys indicated no change in LEP population concentrations in the COTPA service area and an LEP update is not warranted at this time; LEP populations with significant concentrations in the service area remain Spanish, Chinese, and Vietnamese.

Board Representation

COTPA was created by the City of Oklahoma City in 1966 to plan, develop, build, and operate balanced parking and transportation systems (dba EMBARK). The COTPA Board of Trustees is the governing body for the oversight of EMBARK's downtown on/off-street public parking services, bus transit, ferry transit, and downtown bike share. The Board of Trustees is composed of the Mayor, the City Manager, the City Finance Director and five (5) trustees appointed by the Mayor with the consent of the City Council. The Board of Trustees meets the first Friday of the month at 9 a. m. in the City Council Chamber. See Figure 5 for a profile of the COTPA Board of Trustees composition by race

Figure 5: COTPA Board of Trustees - Racial Composition

	COTPA Board	Non-Minority	Minority
Trustees	8	7	1
Percent	100%	88%	13%

Applications for the COTPA Board of Trustees are available on the City of Oklahoma City website at the following link:



https://www.okc.gov/government/boards-trusts-commissions/apply-to-serve-on-a-city-board

The City of Oklahoma City and COTPA encourage and consider Board of Trustee candidates from diverse backgrounds that have an interest in transit and mobility issues.

Subrecipient Monitoring

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color and national origin for programs and activities receiving Federal financial assistance. As part of their Interagency Agreement(s) with COTPA, subrecipients are required to certify compliance with the Title VI laws and regulations. Currently, COTPA's only subrecipient is the City of Edmond, Oklahoma which operates a local fixed-route bus system known as "Citylink."

COTPA annually monitors the following items in relation to the subrecipient's compliance with Title VI.

- 1. Title VI Assurance: COTPA will collect Certification and Assurances from subrecipients prior to passing through FTA funds.
- 2. Title VI Notice to Beneficiaries: A notice that sub-recipient complies with Title VI and procedures the public may follow to file a discrimination complaint. Such a notice should be posted on the website, transit vehicles, transit centers, etc.
- 3. Title VI investigations, complaints or lawsuits: A list of any Title VI investigations, complaints or lawsuits filed against the subrecipient.
- 4. Title VI Complaint Procedures: A copy of the subrecipient's procedures related to the filing of a Title VI complaint. It may include a complaint form, tracking system, and investigating procedures. These procedures must be available upon request.
- 5. Access to Services by Persons with LEP: Either a copy of the LEP plan for providing access to meaningful activities and programs for persons with limited English proficiency which was based on the DOT LEP guidance or a copy of the alternative framework for providing access to activities and programs. It includes the identification and distribution of LEP persons as well as the guidance for language assistance measures.
- 6. Summary of Outreach Efforts to Minority Population: A public participation strategy that offers early and continuous opportunities for the minority population to be involved in transportation decisions. It involves outreach to community-based organizations serving minority and low- income population through meetings and other means of communications.

Title VI Subrecipient Documentation

Subrecipients, as part of their Interagency Agreement(s) with COTPA, certify compliance with the requirements of Title VI laws and regulations and are responsible for developing,



routinely updating, and submitting their triennial Title VI Programs to COTPA and the FTA. See **Appendix C** for the City of Edmond's current Title VI Program.

Equity Analysis – New Facilities

There were no capital facility construction projects undertaken by COTPA in the past three years (April 2016 – April 2019) with federal funding that required NEPA or environmental justice analysis.

Board Approval

The COTPA Board of Trustees Transportation Committee reviewed and approved the COTPA Title VI Program Update at its April 3, 2019 meeting. See **Appendix D** for related approval documents.



REQUIREMENTS OF TRANSIT PROVIDERS

Service standards

In February 1997, the COTPA Board of Trustees adopted service standards to evaluate the performance of the fixed-route and express bus operation – including passenger safety, hours of bus operation, and bus stop location standards. In December 2004, COTPA updated the service standards by focusing on those standards related to Title VI. The following are the service standards and quantifiable criteria used by COTPA to monitor delivery of fixed-route bus service:

1.) Vehicle load for bus service: Exceeding the seating capacity of transit coaches may be acceptable at certain times of day and on certain types of service, generally during peak hours and only on local routes; more than 100% capacity on commuter routes traveling on highways may be excessive.

COTPA Standards:

- For local bus service, passenger loads should not exceed 133% during peak hour service and 100% during non-peak hour service.
- For commuter express bus service, passenger loads should not exceed 100%.
- **2.) Vehicle headway for bus service:** Determining the frequency of service that a bus provides on a route is best based upon several variables including the type of service, time of day, passenger demands and system resources. Deviation from established headways should be based upon passenger counts, employment and/or residential demand data and ridership surveys.

COTPA Standards:

- Headways for local bus service should not exceed 30 minutes during peak-hour service. Peak-hour service is scheduled Monday through Friday, from approximately 5:30 AM to 7:00 PM.
- Headways for local bus service should not exceed 60 minutes during non-peak service. Weeknight (approximately 7:00 PM to midnight), Saturday, and Sunday service is considered non-peak service.
- **3.) On-time performance for bus service:** On-time is defined whenthe buses reach a designated stop from zero to five minutes late. The percentage is derived from CAD/AVL computers installed on all fixed route vehicles. An important part of customer satisfaction is the reliability of the bus route to run on-time. Passengers using routes with buses that do not consistently adhere to published schedules may opt for more dependable modes of transportation.

COTPA Standard:



- Local bus service should operate with a 75% on-time schedule adherence, which
 is defined as arriving on-time or up to five (5) minutes late at a designated
 timepoint.
- **4.) Service availability for bus service:** COTPA bus route service is the product of local funding commitments and design requests of the three (3) area communities (Oklahoma City, Midwest City, and Oklahoma County for bus route service to Spencer) that have annual service contracts with COTPA for route service. Therefore, COTPA does not have a service availability standard, although efforts are made to maximize ridership through effective route design.

SERVICE POLICIES

Service policy – distribution of transit amenities

COTPA's current "Bus Stop Policy" was adopted by the Board of Trustees on January 6, 2017 and includes requirements for transit amenity deployment (See **Appendix E** for the full policy). The policy was developed in a manner consistent with Title VI requirements to ensure the addition of shelters and benches within the EMBARK system does not create a disparate or disproportionate burden. Policy requirements specific to the distribution and locating of new amenities are as follows:

- **Bus Stop Sign Placement:** Bus stop signs will be placed at all bus stops. The signage suite will consist of an EMBARK bus stop identifier, route information sign, unique stop ID sign, and customer information panel.
- **Benches:** Benches will be placed at bus stops averaging multiple boardings per day and at stop locations that meet ADA requirements.
- **Shelters**: Shelters will be placed at bus stops that average at least ten (10) boardings per day and at stop locations that meet ADA requirements.
- **Trash Receptacles:** Trash receptacles will be placed at all shelter locations, where there are at least (10) boardings per day.

Service Policy – Vehicle Assignment

COTPA operates a fleet of 49-buses, which includes both large (35-40-foot) and small (30-foot) buses, during the peak hours. Vehicles are assigned to routes based upon mechanical availability, service readiness, and operational needs of each route. To prevent a newer bus from accruing excessive mileage or premature wear, an older bus may be assigned to the route or routes when it can perform the same or equivalent level of service based upon its mechanical dependability, passenger amenities and seating capacity.

The Operations Division makes bus assignments based upon an assessment of vehicle information supplied by the Maintenance Department. Large buses are assigned to all COTPA bus routes, with the exception of two routes--#19-Spencer and #50-Circ. Route



#19-Spencer uses a small bus due to low passenger loads, and the #50-Circ uses a small bus for enhanced downtown maneuverability. Additional factors requiring deployment of a small bus may include temporary detours or bridge and parking lot weight limits along a route.

Service standards and policies – other modes

For additional context, please see **Appendix H** for service standards and policies specific to COTPA's ferry service and streetcar service. COTPA operates one ferry route and one streetcar route.



DEMOGRAPHIC AND SERVICE PROFILE MAPS AND CHARTS

The COTPA service area is comprised of the three communities—Midwest City, Oklahoma City, and Spencer—in which EMBARK fixed-route bus service has annual operating agreements to provide fixed-route bus service. Most of the EMBARK fixed-route bus service is in Oklahoma City, which is annually funded through the City of Oklahoma City's annual budget. An annual contract with the City of Midwest City supports the operations of route #15-Midwest City. Route #19-Spencer, which operates in northeastern Oklahoma County, is funded through a contract with Oklahoma County.

Demographic analysis of U.S. Census American Community Survey data (2013 – 2017 estimates) indicates that the COTPA service area has a population of 704,980, which is the combined population of Oklahoma City, Midwest City, and Spencer. Approximately 41.03% of the service area's population is minority, and 16.90% of the service area population is considered "living below the poverty line."

Figure 6: Minority Population, COTPA Service Area

C:t-	Total	Minority	Percent
City	Population	Population	Minority
Oklahoma City	643,648	294,791	45.80%
Midwest City	57,308	21,662	37.80%
Spencer	4,024	2,815	69.96%
SERVICE AREA TOTAL	704,980	289,268	41.03%
	•		

Based on American Community Survey, Table DP05, U.S. Census Bureau 2013-2017.

Figure 7: Population Living Below the Poverty Line, COTPA Service Area

City	Total	Population in	Percent in		
City	Population	Poverty	Poverty		
Oklahoma City	643,648	110,064	17.10%		
Midwest City	57,308	8,940	15.60%		
Spencer	4,024	672	16.70%		
STUDY AREA TOTAL 704,980 119,676 16.909					
Based on American Community Survey, Table B17021, U.S. Census Bureau 2013-2017.					



The maps on the following pages further depict the demographic and service profile of the COTPA fixed-route bus system:

- Figure 8: EMBARK 2019 Service Area
- Figure 9: EMBARK 2019 Service Area Minority Population
- Figure 10: EMBARK 2019 Service Area Population Living Below the Poverty Line

The demographic analysis of minority and poverty population within the service area was reflects block group geography and includes block groups adjacent to COTPA fixed-route alignments yet beyond the service area.

Worth noting, Norman is part of the Cleveland Area Rapid Transit (CART) service area and not part of the COTPA service area. In partnership with CART, COTPA operates one commuter express morning and evening trip between Oklahoma City and Norman on the jointly-operated #24-Norman/Sooner Express. Therefore, the minority and low-income demographic maps reflect block groups adjacent to COTPA's bus stops in Norman for route #24.



Figure8: EMBARK 2019 Service Area

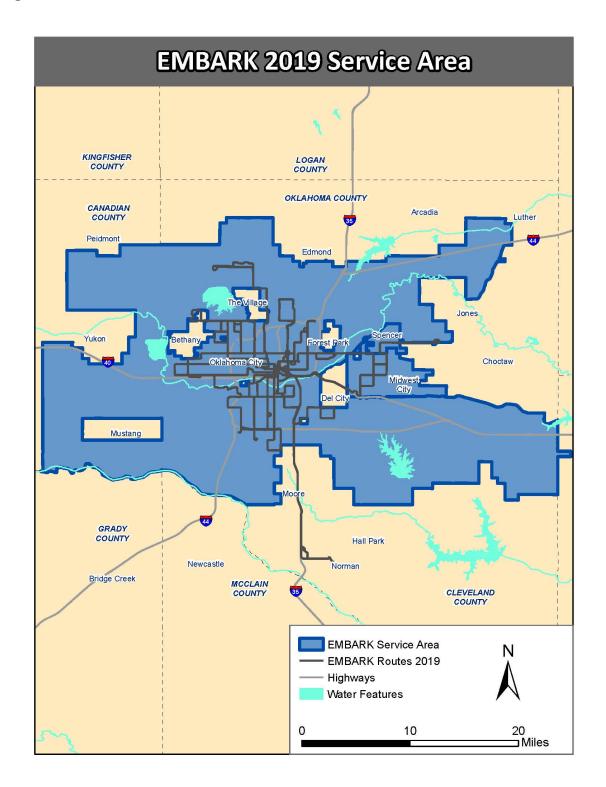




Figure9: EMBARK 2019 Service Area – Minority Population

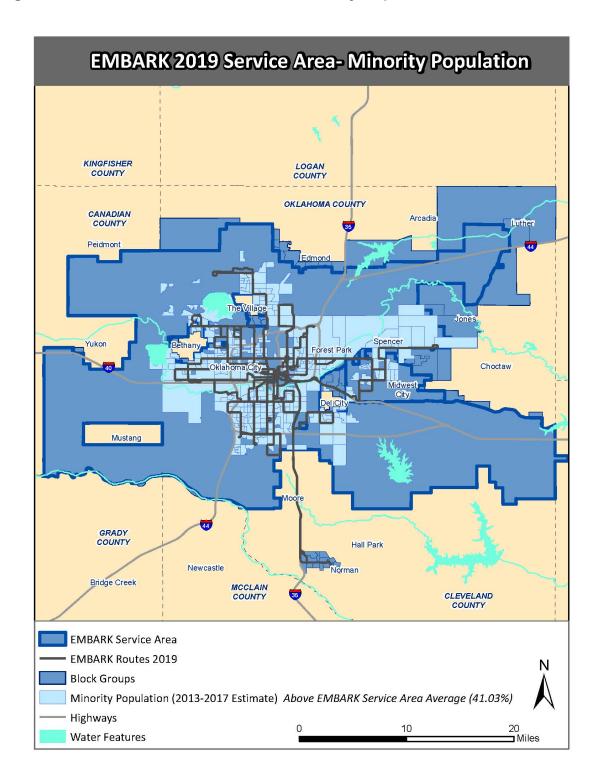
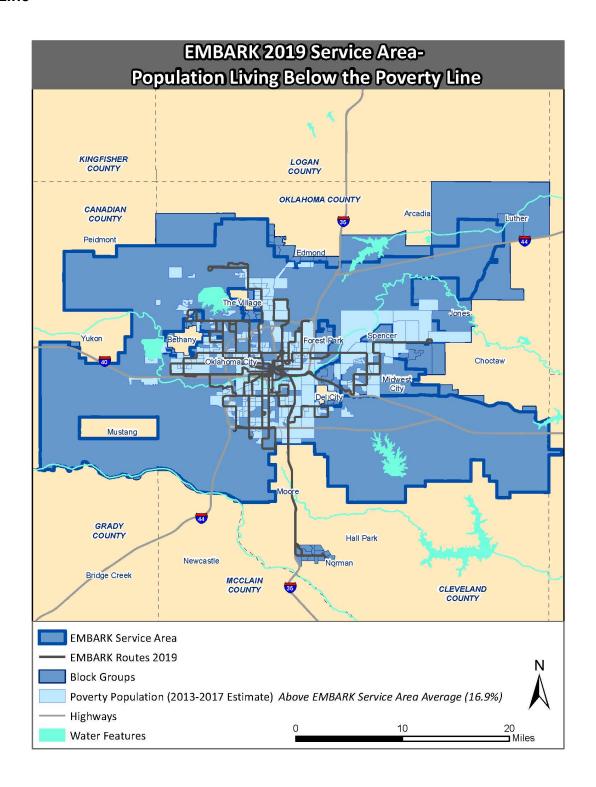




Figure 10: EMBARK 2019 Service Area – Population Living Below the Poverty Line





DEMOGRAPHIC RIDERSHIP AND TRAVEL PATTERNS, COLLECTED BY SURVEYS

On an annual basis, COTPA conducts an On-Board Transit Survey to stay current on the demographic profile and travel needs of fixed-route bus system riders. The statistically valid survey is designed to provide a demographic profile of EMBARK riders as well as critical ridership trend, travel preferences, and other market information to inform service planning decisions. The EMBARK 2017 On-Board Survey can be found in **Appendix F**, and key demographic findings from the survey include the following:

- ETHNICITY/RACE: Forty-two percent (42%) of respondents indicated they were Black/African American, while 37% indicated they were White/Caucasian, 11% of respondents indicated they were Hispanic, Latino, or of Spanish origin, and 13% indicated they were Native American. These results were consistent with previous years.
- **ENGLISH PROFICIENCY:** Seven percent (7%) of respondents indicated they speak English "not well at all" and an additional eleven percent (11%) indicated they speak English "less than well." A combined sixty-five percent (65%) responded they speak English "well" and "very well," and the remaining eighteen-percent (18%) declined to answer the question.
- LANGUAGE SPOKEN AT HOME: Eleven-percent (11%) of respondents indicated they speak a language other than English at home; eighty-nine percent (89%) identified as speaking English at home.
- **HOUSEHOLD INCOME:** Fifty-four percent (54%) of respondents indicated they had annual household incomes of less than \$10,000 in 2017, this is an increase of 14% from 2016. Twenty-four percent (24%) indicated they had incomes between \$10-\$19,999, an increase of 5% from 2016. Seventy-eight percent (78%) of respondents reported an annual income of \$19,999 or less; this is a significant increase of 19% from 2016.
- **VEHICLES IN HOUSEHOLD:** Sixty-seven percent (67%) of EMBARK users have no working vehicle in the household. This is consistent with the results found in 2016 and 2015, in which 68% and 70% of respondents did not have a working vehicle. Only 19% of respondents have one working vehicle; 21 % of respondents in 2016 indicated they had one working vehicle. Thirteen percent (13%) of respondents have two or more vehicles available to their household. **Purpose of Trip:** Forty-four percent (44%) of respondents specified that the purpose of their trip was for work. Seventeen percent (17%) indicated their trip was for shopping or errands. Other purposes included: medical (12%), entertainment/social (7%), social service (4%), school (K-12) (3%), and school (Tech, College, University) (4%).



SERVICE MONITORING

Per FTA Circular 4702.1B, a "minority transit route" is defined as a route that has at least 1/3 of its total revenue mileage in a Census block or block group, or traffic analysis zones with a percentage of minority population that exceeds the percentage of minority population in the transit service area.

As previously noted, COTPA's transit service area includes Oklahoma City, Midwest City, and Spencer that have a minority population percentage of 41.03%. Classifying COTPA routes as "minority" and "non-minority" involved calculating each route's percentage of revenue miles within minority and non-minority Census block groups. For this analysis, "minority block groups" are defined as block groups with percentage of minority population equal to or greater than the transit service area's minority population percentage of 41.03%. "Non-minority block groups" are defined as block groups with percentage of minority population less than 41.03%. COTPA routes in which more than 1/3 of total revenue mileage occurs in minority block groups (with minority population of 41.03% or greater) are classified as "minority transit routes."

COTPA analysis, determined that 20 of COTPA's system of 21 bus routes are classified as "minority transit routes." The one (1) non-minority transit route is the route #50-Circ.



Figure 11: COTPA Route Classification – Minority/Non-Minority

ROUTE	CLASSIFICATION	TOTAL REVENUE MILES PER ROUNDTRIP	PERCENTAGE OF REVENUE MILES IN MINORITY BLOCK GROUPS	PERCENTAGE OF REVENUE MILES IN NON-MINORITY BLOCK GROUPS
2-COLTRANE	MINORITY	13.7	84.90%	15.10%
3-KELLY	MINORITY	12.5	85.80%	14.20%
5-MEMORIAL RD	MINORITY	30	59.00%	41.00%
7-N MAY	MINORITY	14.3	62.20%	37.80%
8-N PENN/NW 63RD	MINORITY	26.2	49.80%	50.20%
9-W RENO CROSSTOWN	MINORITY	14.7	62.30%	37.80%
10-N PORTLAND	MINORITY	16.1	75.20%	24.80%
11-29TH STREET CROSSTOWN	MINORITY	31.5	79.40%	21.60%
12-S MAY	MINORITY	21.2	90.60%	9.40%
13-S WESTERN/I-240 CROSSTOWN	MINORITY	20.7	65.90%	32.70%
14-SE BRYANT OR SUNNYLANE	MINORITY	25.1	56.30%	44.70%
15-MIDWEST CITY	MINORITY	26.8	43.70%	56.30%
16-S PENN	MINORITY	16.3	83.60%	16.40%
18-LINCOLN	MINORITY	18.1	70.30%	29.70%
19-SPENCER	MINORITY	24.9	77.50%	22.54%
22-MARTIN LUTHER KING	MINORITY	15.3	93.80%	6.20%
23-23RD STREET CROSSTOWN	MINORITY	24.9	73.00%	26.90%
24-NORMAN	MINORITY	28.2	51.80%	39.70%
38-10TH STREET CROSSTOWN	MINORITY	21.9	72.80%	27.20%
40-S WALKER	MINORITY	17.4	56.10%	43.90%
50-CIRC	NON-MINORITY	3.4	16.60%	86.40%
SC- Downtown	NON-MINORITY	4.9	8.2%	92.8%
SC- Bricktown	NON-MINORITY	2	0%	100%

Service monitoring – Vehicle load for bus service: COTPA has the following service standards related to vehicle loads:

- For local bus service, passenger loads should not exceed 133% during peak hour service and 100% during non-peak hour service. These standards apply to 20 of COTPA's 21 routes. Peak service refers to COTPA's weekday service scheduled for daytime hours (generally 5:00 AM to 7:00 PM). Off-Peak service refers to weeknight service (generally 7:00 PM-Midnight) and weekend service (Saturday and Sunday).
- For commuter express bus service, passenger loads should not exceed 100%. COTPA only operates one commuter express route, #24-Norman.



COTPA routinely monitors bus loads and related customer comments to ensure service standards are being met and to identify opportunities to add additional route capacity. Review of route passenger loads for the period of January 2019 indicates that service standards are being met (See Figure 12).



Figure12: Average Vehicle Loads – January 2019

ROUTE NAME	CLASSIFICATION	DAY OF WEEK	TIME PERIOD	TRIPS	PASSENGERS	SEATS	LOAD FACTOR	STANDARD
2-COLTRANE	MINORITY	Weekday	Peak	58	666	2,030	0.33	1.33
2-COLTRANE	WIINOKITY	Weekend	Off-Peak	26	227	910	0.25	1.00
3-KELLY	MINORITY	Weekday	Peak	58	414	2,030	0.20	1.33
S-KELL!	WINOKITT	Weekend	Off-Peak	24	145	840	0.17	1.00
		Weekday	Peak	60	939	2,100	0.45	1.33
5-MEMORIAL RD	MINORITY	Weekday	Off-Peak	8	78	280	0.28	1.00
		Weekend	Off-Peak	27	413	945	0.44	1.00
7-N MAY	MINORITY	Weekday	Peak	57	584	1,995	0.29	1.33
7-IV IVIAT	WIIIVOKITT	Weekend	Off-Peak	26	186	910	0.20	1.00
8-N PENN/NW 63RD	MINORITY	Weekday	Peak	61	704	2,135	0.33	1.33
6-IN PENNININ OSKD	WIINOKITT	Weekend	Off-Peak	26	277	910	0.30	1.00
9-W RENO CROSSTOWN	MINORITY	Weekday	Peak	28	372	980	0.38	1.33
9-W RENO CROSSTOWN	WIINOKITY	Weekend	Off-Peak	26	189	910	0.21	1.00
10-N PORTLAND	MINORITY	Weekday	Peak	55	302	1,925	0.16	1.33
10-N PORTLAND	WIINOKITY	Weekend	Off-Peak	26	106	910	0.12	1.00
		Weekday	Peak	59	546	2,065	0.26	1.33
11-29TH STREET CROSSTOWN	MINORITY	Weekday	Off-Peak	8	61	280	0.22	1.00
		Weekend	Off-Peak	26	257	910	0.28	1.00
12-S MAY	MINORITY	Weekday	Peak	59	465	2,065	0.22	1.33
12-5 IVIAT	WIINOKITY	Weekend	Off-Peak	33	226	1,155	0.20	1.00
	MINORITY	Weekday	Peak	56	550	1,960	0.28	1.33
13-S WESTERN/I-240 CROSSTO		Weekday	Off-Peak	11	46	385	0.12	1.00
		Weekend	Off-Peak	33	233	1,155	0.20	1.00
14-SE BRYANT OR SUNNYLANE	MINORITY	Weekday	Peak	41	366	1,435	0.26	1.33
14-3E BRIANT OR SONNTEANE	WIIIVOKITT	Weekend	Off-Peak	33	172	1,155	0.15	1.00
15-MIDWEST CITY	MINORITY	Weekday	Peak	25	228	875	0.26	1.33
16-S PENN	MINORITY	Weekday	Peak	53	330	1,855	0.18	1.33
10-3 FENN	WIIIVORITT	Weekend	Off-Peak	25	145	875	0.17	1.00
18-LINCOLN	MINORITY	Weekday	Peak	28	202	980	0.21	1.33
19-SPENCER	MINORITY	Weekday	Peak	26	70	728	0.10	1.33
		Weekday	Peak	58	389	2,030	0.19	1.33
22-MARTIN LUTHER KING	MINORITY	Weekday	Off-Peak	8	33	280	0.12	1.00
		Weekend	Off-Peak	25	127	875	0.14	1.00
		Weekday	Peak	69	856	2,415	0.35	1.33
23-23RD STREET CROSSTOWN	MINORITY	Weekday	Off-Peak	10	120	350	0.34	1.00
		Weekend	Off-Peak	32	342	1,120	0.31	1.00
24-NORMAN	MINORITY	Weekday	Peak	4	22	140	0.16	1.33
38-10TH STREET CROSSTOWN	MINORITY	Weekday	Peak	60	832	2,100	0.40	1.33
30-10111 3TREET CRO33TOWN	IVIIIVORITI	Weekend	Off-Peak	33	395	1,155	0.34	1.00
40-S WALKER	MINORITY	Weekday	Peak	57	433	1,995	0.22	1.33
-U-J WALKER	IVIIIVUKITT	Weekend	Off-Peak	25	154	875	0.18	1.00
		Weekday	Peak	50	68	1,400	0.05	1.33
50-CIRC	NON-MINORITY	Weekday	Off-Peak	22	9	616	0.01	1.00
		Weekend	Off-Peak	72	41	2,016	0.02	1.00



SERVICE MONITORING – VEHICLE HEADWAYS

Figure 13 presents the current headways for COTPA's bus routes. Bus routes with scheduled headways that do not meet the service standard are highlighted in yellow. As part of its strategic plan, COTPA is working towards 30-minute frequencies for all routes as funding becomes available.

Five (5) of COTPA's 21 bus routes have scheduled headways that currently do not meet service standards:

- #9-W Reno Crosstown (minority route): Weekday service is scheduled every 60minutes.
- #14-SE Bryant/Sunnylane (minority route): Weekday service is scheduled every 45-minutes
- #15-Midwest City (minority route): Weekday is scheduled every 80-minutes due to local funding availability.
- #18-Lincoln (minority route): Weekday service is scheduled every 60-minutes.
- #19-Spencer (minority route): Weekday service is scheduled every 60-minutes due to local funding availability.

Figure 13: COTPA Bus Route Headways (2019, 1Q)

ROUTE	CLASSIFICATION	WEEKDAY	WEEKNIGHT	WEEKEND
COTPA Service Standard – Bus Route Headways		30	60	60
2-COLTRANE	MINORITY	30		60
3-KELLY	MINORITY	30		60
5-MEMORIAL RD	MINORITY	30	60	60
7-N MAY	MINORITY	30		60
8-N PENN/NW 63RD	MINORITY	30		60
9-W RENO CROSSTOWN	MINORITY	60		60
10-N PORTLAND	MINORITY	30		60
11-29TH STREET CROSSTOWN	MINORITY	30	60	60
12-S MAY	MINORITY	30		45
13-S WESTERN/I-240 CROSSTOWN	MINORITY	30	60	45
14-SE BRYANT OR SUNNYLANE	MINORITY	45		45
15-MIDWEST CITY	MINORITY	80		
16-S PENN	MINORITY	30		60
18-LINCOLN	MINORITY	60		
19-SPENCER	MINORITY	60		
22-MARTIN LUTHER KING	MINORITY	30	60	60
23-23RD STREET CROSSTOWN	MINORITY	25	60	50
24-NORMAN	MINORITY	Peak		
38-10TH STREET CROSSTOWN	MINORITY	30		45
40-S WALKER	MINORITY	30		60
50-CIRC	NON-MINORITY	30	30	30
Streetcar	NON-MINORITY	12 to 15	12 to 15	12 to 15



Service monitoring – on-time performance

On a monthly basis, COTPA monitors on-time performance trends to ensure reliable and dependable service delivery. Service changes and adjustments are implemented as necessary to improve on-time performance and recurring schedule adherence issues. COTPA's service standard for on-time bus service calls for 75% on-time schedule adherence, which is defined as arriving on-time or up to five (5) minutes late at a designated timepoint. Data for on-time performance originates from GPS equipment installed on all buses in the fleet and reporting software that compares scheduled departure times against real-time departures. Data includes all vehicles and service levels for optimal accuracy. Figure 14 presents on-time performance rates for COTPA's bus routes reflective of January 2019.

Figure 14: COTPA On-Time Performance (January 2019)

ROUTE	CLASSIFICATION	WEEKDAY	WEEKNIGHT	WEEKEND
2-COLTRANE	MINORITY	72%		67%
3-KELLY	MINORITY	84%		69%
5-MEMORIAL RD	MINORITY	49%	73%	65%
7-N MAY	MINORITY	82%		69%
8-N PENN/NW 63RD	MINORITY	58%		70%
9-W RENO CROSSTOWN	MINORITY	83%		72%
10-N PORTLAND	MINORITY	85%		83%
11-29TH STREET CROSSTOWN	MINORITY	72%	59%	76%
12-S MAY	MINORITY	77%		84%
13-S WESTERN/I-240 CROSSTOWN	MINORITY	73%	63%	75%
14-SE BRYANT OR SUNNYLANE	MINORITY	80%		80%
15-MIDWEST CITY	MINORITY	83%		
16-S PENN	MINORITY	83%		72%
18-LINCOLN	MINORITY	76%		
19-SPENCER	MINORITY	58%		
22-MARTIN LUTHER KING	MINORITY	85%	75%	83%
23-23RD STREET CROSSTOWN	MINORITY	72%	65%	62%
24-NORMAN	MINORITY	52%		
38-10TH STREET CROSSTOWN	MINORITY	80%		77%
40-S WALKER	MINORITY	85%		75%
50-CIRC	NON-MINORITY	62%	96%	54%
Streetcar	NON-MINORITY	94%	94%	94%
System Av	erage (January 2019)	75%	75%	74%
COTPA Service Standard –	75%	75%	75%	



Service monitoring – service availability

Though COTPA does not have a service availability standard, service availability is monitored by the percentage of population in proximity to its fixed-route bus service. Figures 15 and 16 provide a summary of the service proximity for minority and low-income populations within Census block groups with ¼-mile of a COTPA bus route.

Analysis indicates that the COTPA fixed-route bus system is located within ¼-mile of the majority of minority and low-income populations within the service area:

- 62.20% of the COTPA service area population is within ¼-mile of a COTPA bus route
- 69.12% of the COTPA service area minority population is within ¼-mile of a COTPA bus route.
- 63.12% of the population living below the poverty line in the COTPA service area is within ¼-mile of a COTPA bus route.

Figure 15: Service Area Population within ¼-mile of a bus route – Minority Population

	SERVICE AREA	POPULATION	SERVICE AREA Within 1/4 Mile (of EMBARK Fixed		
	Population	Percent	Population	Percent		
Minority	289,268	41.03%	199,929	69.12%		
Non-Minority	415,712	58.97%	238,546	57.38%		
Totals	704,980	100.0%	438,475	62.20%		
Based on American Community Survey Table DP05 11 S. Census Bureau 2013-2017						



Figure 16: Service Area Population within ¼-mile of a bus route – Poverty Population

	SERVICE AREA	POPULATION	SERVICE AREA POPULATION Within 1/4 Mile of EMBARK Fixed Route		
	Population	Percent	Population	Percent	
Below Poverty Line	119,676	16.98%	75,540	63.12%	
Above Poverty Line	585,304	83.02%	362,935	62.01%	
Totals	704,980	100.0%	438,475	62.20%	
Based on American Community Survey, Table DP05, U.S. Census Bureau 2013-2017.					

Service monitoring – vehicle assignment

COTPA has a fleet of 59 buses, with 49 operating during peak hours. The fleet is comprised of 53 large buses (seating 32 – 40 passengers) and 6 small buses (seating 28 passengers). As previously discussed, vehicles are assigned on a rotating basis with considerations for service availability, mechanical dependability, and operational needs specific to route. Small buses are assigned to operate on route #19-Spencer and #50-Circ to meet ridership demands and maneuverability needs. Figure 17 reflects the COTPA bus fleet and average ages by series and bus size. Figure 18reflects the average age of fleet deployed for the month of January 2019.



Figure17: COTPA Bus Fleet – Average Age

COTPA - LARGE BUS FLEET (January 2019)

SERIES	VEHICLES	MAKE	LENGTH	SEATING	YEAR	AGE OF BUSES	SERIES TOTAL AGE
901-913	13	Gillig	35	32	2009	10.0	130.0
914-915	2	Gillig	40	39	2009	10.0	20.0
1100-1107	7	Gillig	35	32	2011	8.0	56.0
1180-1181	2	New Flyer	40	40	2011	8.0	16.0
	1	Nova	40	35	2012	7.0	7.0
1307-1310	4	Gillig	35	32	2012	7.0	28.0
1311-1316	6	Gillig	40	39	2012	7.0	42.0
1601-1606	6	New Flyer	40	35	2016	3.0	18.0
1701-1711	12	New Flyer	40	35	2016	3.0	36.0
	53				Ave	erage Age	6.7

COTPA - SMALL BUS FLEET (January 2019)

SERIES	VEHICLES	MAKE	LENGTH	SEATING	YEAR	AGE OF BUSES	SERIES TOTAL AGE
1301-1306	6	Gillig	30	28	2012	7.0	42.0
	6				Ave	erage Age	7.0



Figure 18: COTPA Bus Assignments - Average Age (January 2019)

ROUTE	CLASSIFICATION	BUS SIZE	AVERAGE AGE BUSES DEPLOYED	AVERAGE AGE TOTAL FLEET
2-COLTRANE	MINORITY	LARGE	7.1	6.7
3-KELLY	MINORITY	LARGE	8.5	6.7
5-MEMORIAL RD	MINORITY	LARGE	4.1	6.7
7-N MAY	MINORITY	LARGE	8.7	6.7
8-N PENN/NW 63RD	MINORITY	LARGE	6.7	6.7
9-W RENO CROSSTOWN	MINORITY	LARGE	6.3	6.7
10-N PORTLAND	MINORITY	LARGE	6.3	6.7
11-29TH STREET CROSSTOWN	MINORITY	LARGE	7.6	6.7
12-S MAY	MINORITY	LARGE	6.6	6.7
13-S WESTERN/I-240 CROSSTOWN	MINORITY	LARGE	5.8	6.7
14-SE BRYANT OR SUNNYLANE	MINORITY	LARGE	5.7	6.7
15-MIDWEST CITY	MINORITY	LARGE	5.0	6.7
16-S PENN	MINORITY	LARGE	7.1	6.7
18-LINCOLN	MINORITY	LARGE	3.2	6.7
19-SPENCER	MINORITY	SMALL	6.6	7.0
22-MARTIN LUTHER KING	MINORITY	LARGE	6.3	6.7
23-23RD STREET CROSSTOWN	MINORITY	LARGE	5.9	6.7
24-NORMAN	MINORITY	LARGE	9.8	6.7
38-10TH STREET CROSSTOWN	MINORITY	LARGE	4.9	6.7
40-S WALKER	MINORITY	LARGE	9.6	6.7
50-CIRC	NON-MINORITY	SMALL	6.9	7.0



Service monitoring – transit amenity distribution

COTPA has a service policy of providing a passenger shelter for bus stops averaging 10 or more boardings per day—a boarding threshold generally much lower than other transit operators. Review of shelter deployment indicated that nine (9) routes need additional shelters to meet the service policy and ten (10) routes currently have more shelters than required. COTPA continues to program and install more passenger shelters at bus stops, with 45 additional shelters planned for installation later this summer to address service policy requirements and accommodate passenger needs and grow ridership.

Figure 19: COTPA Shelter Distribution by Route

ROUTE	CLASSIFICATION	SHELTERS REQUIRED (STOPS W/ 10+ AVERAGE DAILY BOARDINGS)	SHELTERS DEPLOYED	DIFFERENCE	
2-COLTRANE	MINORITY	13	10	-3	
3-KELLY	MINORITY	9	7	-2	
5-MEMORIAL RD	MINORITY	17	18	1	
7-N MAY	MINORITY	11	13	2	
8-N PENN/NW 63RD	MINORITY	14	18	4	
9-W RENO CROSSTOWN	MINORITY	9	6	-3	
10-N PORTLAND	MINORITY	7	11	4	
11-29TH STREET CROSSTOWN	MINORITY	8	11	3	
12-S MAY	MINORITY	10	6	-4	
13-S WESTERN/I-240 CROSSTOWN	MINORITY	12	11	-1	
14-SE BRYANT OR SUNNYLANE	MINORITY	6	6	0	
15-MIDWEST CITY	MINORITY	4	3	-1	
16-S PENN	MINORITY	6	6	0	
18-LINCOLN	MINORITY	4	8	4	
19-SPENCER	MINORITY	2	3	1	
22-MARTIN LUTHER KING	MINORITY	6	11	5	
23-23RD STREET CROSSTOWN	MINORITY	24	21	-3	
24-NORMAN	MINORITY	5	9	4	
38-10TH STREET CROSSTOWN	MINORITY	12	13	1	
40-S WALKER	MINORITY	12	9	-3	
50-CIRC	NON-MINORITY	3	1	-2	
NET SHELTER DEPLOYMENT VS POLICY (TOTAL SYSTEM)					



COTPA'S PUBLIC ENGAGEMENT PROCESS: MAJOR SERVICE CHANGE, DISPARATE IMPACT, AND DISPROPORTIONATE BURDEN POLICIES

Following is COTPA's policy for major service and fare changes, disparate impacts, and disproportionate burdens:

Title VI of The Civil Rights Act of 1964

No Person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

FTA Circular 4702.1b (Effective October 1, 2012)

All recipients of Federal funding must submit a Title VI program every three years. Transit providers in an urbanized area with a population of 200,000 or more and at least 50 peak vehicles, must establish policies defining thresholds for major service changes and disparate impacts/disproportionate burdens for use in the assessment of proposed Major Service Changes or fare changes. Policies must:

- Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- The public must be engaged in the decision-making process to develop the policies
- Policies must be approved by Board of Directors or other governing entity

FTA Definitions¹

Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exist one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

Disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income populations or riders more than non-low-income populations or riders. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

Disparate treatment refers to actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e., less favorably) than others because of their race, color, or national origin.

Fixed route_refers to public transportation service provided in vehicles operated along pre-determined routes according to a fixed schedule.

¹ FTA Circular 4702.1B



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Low-income person refers to an individual whose family income is at or below 150 percent of the poverty line (as that term is defined in Section 673(2) of the Community Services Block Grant Act (42 U.S.C 9902(2)), including any revision required by that section) for a family of the size involved.

Low-income population refers to any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.

Minority persons include the following:

- (1) American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- (2) Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- (3) Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
- (4) Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- (5) Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

Minority population means any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity.

National origin means the particular nation in which a person was born, or where the person's parents or ancestors were born.

Predominantly minority area means a geographic area, such as a neighborhood, Census tract, block or block group, or traffic analysis zone, where the proportion of minority persons residing in that area exceeds the average proportion of minority persons in the recipient's service area.

Public transportation means regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability, or low income; and does not include Amtrak, intercity bus



service, charter bus service, school bus service, sightseeing service, courtesy shuttle service for patrons of one or more specific establishments, or intra-terminal or intra-facility shuttle services. Public transportation includes buses, subways, light rail, commuter rail, monorail, passenger ferry boats, trolleys, inclined railways, people movers, and vans. Public transportation can be either fixed route or demand response service.

Service area refers either to the geographic area in which a transit agency is authorized by its charter to provide service to the public, or to the planning area of a State Department of Transportation or Metropolitan Planning Organization.

COTPA definitions

Special services refers to transportation programs classified outside the definition of typical demand response paratransit and fixed route public transportation services provided under Title VI. Special services transportation includes older adult transportation for grocery shopping and to congregate meal sites as well as to non-emergency medical/dental appointments. Special services transportation programs differ from complementary paratransit services in that: they require a separate application, extend beyond the defined service area for fixed-route public transportation and paratransit services, and may allow for same-day transportation.

Service area for COTPA corresponds to the City of Oklahoma City limits and other county or municipal entities that contract with COTPA for public transit service.

Major service change policy

A major service change is defined as the following:

- A 25% or more addition, reduction or change in the service hours or miles of any route that would remain in effect for twelve (12) or more months.
- A new transit route that would remain in effect for twelve (12) or more months.

All major service changes will be subject to an equity analysis that includes an analysis of potential Disparate Impact or Disproportionate Burden.

A review is not required for seasonal changes, changing a route number or other designation, additional demonstration/experimental service within the first twelve months, service changes on Special Service routes, or route changes caused by an emergency.

All fare changes regardless of size are subject to a fare equity analysis that includes an examination of a potential Disparate Impact or a Disproportionate Burden.

Adverse effect

Determination of adverse impact is based on the federal standard described in Uniform Guidelines published by the Equal Employment Opportunity Commission (EEOC) known as the 'four-fifths' rule. This standard requires benefits to accrue to protected populations



as a rate at least four-fifths (4/5 or 80%) of the rate of unprotected populations. Likewise, adverse effects must be borne by unprotected populations at a rate of at least four-fifths (4/5 or 80%) of the rate for protected populations.

Stated another way, the maximum acceptable difference (positive or negative) in level of benefit between protected and unprotected populations is 20%. For changes in transit service or transit fare rates, this standard applies as follows for minority and low-income populations.

Disparate impact policy

The disparate impact policy establishes a threshold for determining when adverse effects of a major service change (or fare change) are borne disproportionately by minority populations. COTPA's threshold for statistically significant disparity is when minority populations or riders will experience a 20% or greater adverse effect than that borne by the non-minority population or riders, then such changes will be considered to have a disparate impact.

Additionally, if benefits associated with the service change accrue to non-minority riders greater than 20% when compared to minority riders, then that change will be determined to have a disparate impact.

If a disparate impact is identified, COTPA will consider modifying the proposed changes in order to avoid, minimize, or mitigate the disparate impacts of the proposed changes. Any proposed modifications to the original proposal will also be analyzed to assess whether disparate impacts would result. If, after considering alternatives, COTPA finds that a disparate impact will still result from the major service change, COTPA will implement the change only if:

- There is a substantial legitimate justification for the proposed change, and
- There are no alternatives that would have a less disparate impact on minority riders while still accomplishing the legitimate goals for the proposed change.

Disproportionate burden policy

The disproportionate burden policy establishes a threshold for determining when adverse effects of a major service change (or fare change) are borne disproportionately by low-income populations. COTPA's threshold for statistically significant disparity is when low income populations or riders will experience a 20% or greater adverse effect than that borne by the non-low income population or riders, then such changes will be considered to have a disparate impact.

Additionally, if benefits associated with the service change accrue to non-low income riders greater than 20% when compared to low-income riders, then that change will be determined to have a disproportionate burden.



If a disproportionate burden is identified, COTPA will consider modifying the proposed changes in order to avoid, minimize, or mitigate the disparate impacts of the proposed changes. Any proposed modifications to the original proposal will also be analyzed to assess whether disproportionate burden would result.

Evaluating fare changes

In accordance with FTA guidelines, COTPA will conduct an equity analysis of any proposed fare changes to assess whether the changes would cause a disparate impact on minorities or a disproportionate burden for low-income individuals. COTPA will use the same thresholds for determining disparate impact and disproportionate burdens as used in service change equity analyses. If a disparate impact is identified, COTPA will 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. COTPA will then implement the alternative with the smallest disparate impact that still achieves the legitimate objectives of the fare change. If a disproportionate burden is identified, COTPA take steps to avoid, minimize or mitigate impacts where practicable. COTPA will describe alternatives available to low-income populations affected by the fare changes.

A review is not required for the following:

- "Spare the air days" or other instances when a local municipality or transit agency has declared that all passengers ride free.
- Temporary fare reductions that are mitigating measures for other actions. For example, construction activities may close a segment of a rail system for a period of time and require passengers to alter their travel patterns. A reduced fare for these impacted passengers is a mitigating measure and does not require a fare equity analysis.
- Promotional fare reductions. If a promotional or temporary fare reduction lasts longer than six months, then FTA considers the fare reduction permanent and the transit provider must conduct a fare equity analysis.

When conducting the fare change analysis, COTPA will compare the absolute and percentage change borne by minority riders (and low income rider) compared to the absolute and percentage change borne by non-minority riders (or non-low income riders) for each of the fare changes proposed. If the total fare change results in a 20% or greater adverse impact to minority riders (or low income riders) when compared to non-minority riders (or non-low income riders), then the fare change will be determined to have a disparate impact for minority riders and/or a disproportionate impact for low income riders.

Additionally, if benefits associated with the fare change accrue to non-minority riders (or non-low income riders) greater than 20% when compared to minority riders (or low-



income riders), then the change will be determined to have a disparate impact and/or a disproportionate burden.

Data sources

COTPA will utilize census data and GIS maps to conduct service equity analyses. For fare equity analyses ridership and onboard survey data will be utilized. These data sources were chosen based on availability, accuracy and applicability.

Public engagement process

Prior to the institution of a proposed fare increase or substantial service change, a notice of a public hearing shall be published on the EMBARKok.com website as well as in a newspaper of general circulation in the service area. The notice shall also be published in media outlets oriented to specific groups or neighborhoods that may be affected. The notice shall be published at least 14 days prior to the public hearing. The notice shall contain a description of the proposed service change(s) and/or the fare change(s) as appropriate, and the date, time and place of the hearing. Additional outreach will be conducted as deemed appropriate by COTPA staff.

SERVICE AND FARE ANALYSIS SINCE LAST TITLE VI SUBMISSION

Major service changes since 2016 submission:

There have been two occurrences of "Major Service Changes" (Summer 2018 and Winter 2019) to the COTPA fixed-route bus service since the last submission; related service equity analysis reports are in **Appendix G**.

Fare increase since 2016 submission:

There has been one "Fare Increase" (Summer 2019) for the COTPA fixed-route bus service since the last submission; a related fare equity analysis report in in **Appendix G**.



APPENDIX A

COTPA TITLE VI COMPLAINT FORM



Title VI Complaint Form

Central Oklahoma Transportation & Parking Authority

DAY PHONE

Title VI of the Civil Rights Act of 1964 requires that "No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

All complaints must be in writing and signed by the complainant or his/her representative before action can be taken. Complaints shall state, as fully as possible, the facts and circumstances surrounding the alleged discrimination. The Central Oklahoma Transportation & Parking Authority (COTPA) will provide a written acknowledgment of the complaint within ten (10) working days.

The completed form should be sent to: COTPA

Re: Title VI 2000 S May

Oklahoma City, OK 73108

Complainant Contact Information (Person discriminated against) NAME

AILING ADDRESS			EVENING I	PHONE	
TY	STATE	ZIP CODE	E-MAIL		
erson Discrimiı	nated Against (# 0	Other Than Complainant)			
	nated Against (# (Other Than Complainant)	DAY PHON	NE	
	nated Against (# (Other Than Complainant)	DAY PHON	NE.	
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ME	nated Against (if (Other Than Complainant)	DAY PHON		
ME	nated Against (if (Other Than Complainant)			
ME	nated Against (if (Other Than Complainant)			
erson Discrimit ME MILING ADDRESS	nated Against (If (Other Than Complainant) ZIP CODE			

Incident Details

What was the discrimi	nation based on? (Ch	neck all that apply)	
☐ Race	☐ Color	☐ Low Income	☐ Disability
☐ National Origin	☐ Gender	☐ Limited English Proficie	ency
What COTPA representative (s) are the person alleging were involved?		Date of incident resulting in discr	Time of Inciden
		Describe how you were discrim responsible and what happened For additional space, attach additional sheet	d?
		e provide specific details. (i.e. location, bu	us number, drivers name, etc.)

NA	ME				DA'	/ PHONE	
MA	AILING ADDRESS				EVE	ENING PHONE	 <u></u>
CI	TY	STATE	ZIP COI	DE	E-N	MAIL	
NA	ME				DA	PHONE	
MΑ	AILING ADDRESS				EVE	ENING PHONE	
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SW	u file this complaint with anot	nplaint was filec	d with and pro	vide ager	icy conta	act informa	
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Oth	eral Agency	pplaint was filed	te Agency Date ZIP CODE	vide ager State Filed:	CONTACT PHONE E-MAIL	PERSON	tion: ocal Agenc

APPENDIX B

LIMITED ENGLISH PROFICIENCY PLAN



INTRODUCTION

On December 14, 2005, the U.S. Department of Transportation (DOT) issued guidance on special language services to Limited English Proficient (LEP) persons (Federal Register Volume 70, Number 239, pages 74087-74100). This guidance is in compliance with Executive Order 13166 and Department of Justice (DOJ) LEP Guidance ("Enforcement of Title VI of the Civil Rights Act of 1964 – National Origin Discrimination Against Persons with Limited English Proficiency"). Title VI and its regulations require the Central Oklahoma Transportation and Parking Authority (COTPA) to take reasonable steps to ensure "meaningful" access to transit services and programs for LEP population as well as to become informed about its diverse clientele from a linguistic, cultural and social perspective.

COTPA approaches serving the LEP population residing within its service area with the mission to provide better access of public transportation to these groups. As a public transit agency, COTPA serves the Oklahoma City area which is predominantly an English- speaking community. However, there are other language speaking groups who meet the threshold for receiving translations of documents into their languages. They are Spanish, Vietnamese and Chinese.

Providing practical access to information of COTPA programs and services to all of its customers is a priority for COTPA. It is the intent to make the system as accessible and easy-to-use as possible. To accomplish this, COTPA expects to deliver its commitment to serve the entire community, as well as, to break the language barriers with service that is safe, dependable, responsive and inviting. COTPA is committed to taking reasonable steps to provide meaningful access to vital information and services for LEP stakeholders who use its services, facilities and programs, and who attend its meetings and events.

COTPA will make responsible efforts to provide language assistance to ensure meaningful access for LEP individuals by:

- Conducting a four-factor analysis
- Developing a Language Access Plan
- Providing appropriate language assistance

Four- factor analysis

Federally assisted recipients are required to take reasonable steps to ensure meaningful access to LEP persons. In order to determine the need, COTPA used the following Four Factor Analysis from the Department of Justice's "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons":

1. The number or proportion of LEP persons in the service area who may be served, or are likely to encounter a COTPA program, activity or service

- 2. The frequency with which LEP persons come in contact with COTPA programs, activities or services
- 3. The nature and importance of programs, activities or services provided by COTPA to the LEP population
- 4. The resources available to COTPA and overall cost to provide LEP assistance

The Four Factor Analysis is used to determine oral language assistance while the "Safe Harbor" provisions are for written translations. A "Safe Harbor" means that COTPA has undertaken efforts to comply with respect to the needed translation of vital written materials.

COTPA's written translations, under these circumstances, are intended to demonstrate strong evidence of compliance with COTPA's written-translation obligations under Title VI. The failure to provide written translations under the circumstances outlined in paragraphs (a) and (b) does not mean there is noncompliance. Rather these paragraphs merely provide a guide for COTPA to achieve a greater certainty of compliance than can be provided by a fact-intensive, four factor analysis:

- (a) COTPA will provide recipient written translations of vital documents for each eligible LEP language group that constitutes 5 percent or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally: or
- (b) If there are fewer than 50 persons in a language group that reaches the 5 percent trigger in (a), COTPA may not translate vital written materials but will provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost. These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

Figure 1: LEP Provision of Written Language Assistance Requirements

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents
More than 5% of the eligible population or beneficiaries and more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries and 50 or less in number	Translated written notice of right to receive free oral interpretation of documents
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required

Plan summary

COTPA developed this LEP Plan to help identify reasonable steps for providing language assistance to LEP persons who wish to access services provided by the transit authority. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required and how to notify LEP persons that assistance is available. In order to prepare this plan, COTPA undertook the U.S. DOT four- factor LEP analysis guidelines. A summary of the results of the four-factor analysis follows.

FACTOR 1: The number or proportion of LEP persons in the service area who may be served, or are likely to encounter a COTPA program, activity or service. In order to help identify LEP Persons, COTPA refers to the US Bureau of Census: American Community Survey 2010 – 2014 (5- Year Data), Table B16001:

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION FIVE YEARS AND OVER.

In Figures 2 and 3, shown on the following pages, COTPA considered people that speak English other than "very well" as LEP persons. The first percentage column represents the average of the total number of a specific language spoken divided by the total population. The "well" column represents the total number of person(s) that speaks English less than "very well". The last "percentage" column represents the amount of LEP individuals in each language.

Figure 2: LEP Assessment, Language Spoken at Home by Ability to Speak English for the Pop. 5 Years and Over, Oklahoma City, Oklahoma, American **Community Survey (2010-2014)**

	Total	%	< well	LEP %
Population 5 years and over	553,493			
Speak only English	445,164	80.43%		
Spanish or Spanish Creole	79,015	14.28%	41,202	7.44%
French (incl. Patois, Cajun)	1,318	0.24%	185	0.03%
French Creole	34	0.01%	6	0.00%
Italian	86	0.02%	21	0.00%
Portuguese or Portuguese Creole	194	0.04%	66	0.01%
German	1,101	0.20%	127	0.02%
Yiddish	0	0.00%	0	0.00%
Other West Germanic languages	45	0.01%	0	0.00%
Scandinavian languages	89	0.02%	5	0.00%
Greek	124	0.02%	9	0.00%
Russian	398	0.07%	92	0.02%
Polish	456	0.08%	29	0.01%
Serbo-Croatian	148	0.03%	61	0.01%
Other Slavic languages	8	0.00%	0	0.00%
Armenian	55	0.01%	0	0.00%
Persian	948	0.17%	205	0.04%
Gujarati	327	0.06%	119	0.02%
Hindi	677	0.12%	101	0.02%
Urdu	673	0.12%	272	0.05%
Other Indic languages	707	0.13%	360	0.07%
Other Indo-European languages	176	0.03%	79	0.01%
Chinese	1,958	0.35%	1,082	0.20%
Japanese	260	0.05%	44	0.01%
Korean	801	0.14%	449	0.08%
Mon-Khmer, Cambodian	133	0.02%	86	0.02%
Hmong	336	0.06%	12	0.00%
Thai	266	0.05%	134	0.02%
Laotian	1,070	0.19%	606	0.11%
Vietnamese	9,201	1.66%	5,530	1.00%
Other Asian languages	3,125	0.56%	1,063	0.19%
Tagalog	640	0.12%	159	0.03%
Other Pacific Island languages	318	0.06%	39	0.01%
Navajo	5	0.00%	5	0.00%
Other Native North American	634	0.11%	74	0.01%
Hungarian	30	0.01%	21	0.00%
Arabic	1,273	0.23%	364	0.07%
Hebrew	179	0.03%	0	0.00%
African languages	1,653	0.30%	318	0.06%
Other and unspecified languages	168	0.03%	88	0.02%

Figure 3: LEP Assessment, Language Spoken at Home by Ability to Speak English for the Pop. 5 Years and Over, Oklahoma County, Oklahoma, American **Community Survey (2010-2014)**

	Total	%	< well	LEP %
Population 5 years and over	685,123			
Speak only English	571,857	83.47%		
Spanish or Spanish Creole	83,685	12.21%	42,987	6.27%
French (incl. Patois, Cajun)	1,441	0.21%	231	0.03%
French Creole	77	0.01%	6	0.00%
Italian	124	0.02%	41	0.01%
Portuguese or Portuguese Creole	292	0.04%	76	0.01%
German	1,509	0.22%	215	0.03%
Yiddish	0	0.00%	0	0.00%
Other West Germanic languages	52	0.01%	0	0.00%
Scandinavian languages	84	0.01%	5	0.00%
Greek	99	0.01%	9	0.00%
Russian	457	0.07%	53	0.01%
Polish	340	0.05%	91	0.01%
Serbo-Croatian	117	0.02%	30	0.00%
Other Slavic languages	46	0.01%	0	0.00%
Armenian	67	0.01%	12	0.00%
Persian	1,005	0.15%	238	0.03%
Gujarati	188	0.03%	40	0.01%
Hindi	654	0.10%	66	0.01%
Urdu	891	0.13%	294	0.04%
Other Indic languages	816	0.12%	336	0.05%
Other Indo-European languages	168	0.02%	70	0.01%
Chinese	2,536	0.37%	1,348	0.20%
Japanese	307	0.04%	105	0.02%
Korean	951	0.14%	480	0.07%
Mon-Khmer, Cambodian	160	0.02%	113	0.02%
Hmong	336	0.05%	12	0.00%
Thai	485	0.07%	264	0.04%
Laotian	839	0.12%	563	0.08%
Vietnamese	6,649	0.97%	4,153	0.61%
Other Asian languages	2,810	0.41%	1,015	0.15%
Tagalog	1,025	0.15%	236	0.03%
Other Pacific Island languages	447	0.07%	46	0.01%
Navajo	16	0.00%	5	0.00%
Other Native North American languages	818	0.12%	100	0.01%
Hungarian	39	0.01%	30	0.00%
Arabic	1,666	0.24%	677	0.10%
Hebrew	152	0.02%	0	0.00%
African languages	2,064	0.30%	288	0.04%
Other and unspecified languages	124	0.02%	88	0.01%

Analysis of five-year American Community Survey data showed that LEP populations represent 6.98 percent of the total population of Oklahoma City, which is in fact larger than the COTPA service area. A table showing information for all of Oklahoma County was shown since a small portion of COTPA's service extends beyond the Oklahoma City municipal boundaries. Results from both tables are similar. Of the LEP populations, the largest group is Spanish (86%), followed distantly by Vietnamese (12%), and Chinese (2%). These languages meet COTPA's threshold for translation of vital documents. "Other Asian Languages" was also identified with more than 1,000 persons. However, no specific Asian languages have been identified through other means to provide further guidance. Data collection methods include but are not limited to call center data, public meetings, driver interviews, passenger surveys, emails, social media and web portal. COTPA will continue to monitor for other language needs using all methods of data collection available.

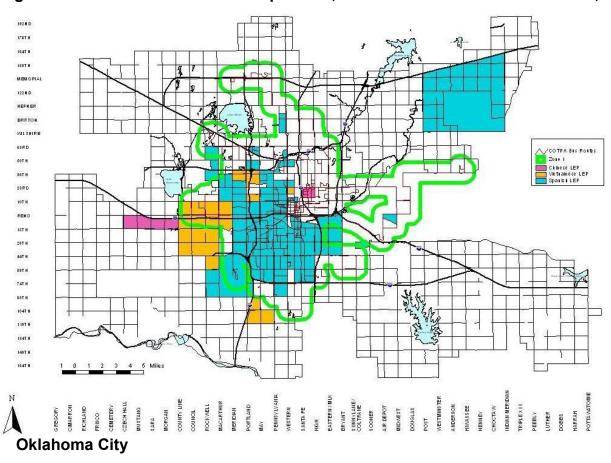


Figure 4: Concentrations of LEP Population, COTPA Fixed-Route Service Area,

Figure 3 shows that most of the LEP populations located themselves within the well-served transit service area "Zone 1" which is ¾ of a mile from either side of a fixed-route. There are 72 tracts that have Spanish LEP population from 5% to 47%, nine tracts with Vietnamese LEP populations from 3% to less than 5%, and only two tracts

with Chinese LEP populations from 3% to 4%. Spanish speakers are mostly located in the south, southwest and west of downtown Oklahoma City.

Comparatively, Vietnamese and Chinese speakers were more widely dispersed than Spanish speakers. Vietnamese speakers are very concentrated in northwest Oklahoma City, known as the Asian District, and also scattered in the west and south. One of the two tracts of Chinese speakers is located just north of downtown and the other one is in the far west. Most of the tracts with high percentages of LEP population are located within a few miles south, northwest and west of the Downtown Transit Center. There are several COTPA fixed-routes serving these tracts.

FACTOR 2: The frequency with which LEP persons come in contact with COTPA programs, activities or services.

To conduct Factor 2. COTPA relied on an internal audit of LEP contact information generated by agency personnel, technological systems and survey research. In the context of Factor 2, "relevant programs, activities and services provided" were defined as: Ridership, Fares and Customer Service as these are the means by which people use or inquire about transit services and programs.

It is very difficult to acquire contact information related to LEP persons. Often they do not want to interact with COTPA service personnel due to fear and/or language barriers. Limited survey information has been available providing ethnicity/race data and LEP status. Otherwise, there was no comprehensive process in place to routinely capture LEP contact information – either from technological systems or from standard survey. Some information was obtained through surveys from bus operators, customer service representatives and dispatch personnel, but no ongoing data gathering system exists to routinely discuss LEP contacts with bus operators or frontline staff.

It was found from the driver surveys that out of all riders encountered on a monthly basis, about 5 percent are Spanish, about 1 percent are Vietnamese, and less than 1percent are Chinese speaking. All of them may or may not be LEP persons. However, the Transit Center's Spanish Customer Service Representative reported frequent contact with Spanish LEP persons, about five to ten in person and about five via phone per day. Very seldom were there any Vietnamese or Chinese speaking LEP persons in contact with the Customer Service Representative. There are four Spanish LEP persons that utilize COTPA's paratransit service. COTPA's bilingual Customer Service Representative helps these customers and schedules their trips. There were no requests for translation of vital documents in any language covering the period July 1, 2012 to June 30, 2015.

COTPA assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. Figure 4 identifies the possible "touch points" and frequencies related to LEP interaction. ("Frequently" means on a daily basis and "Occasionally" means weekly or monthly).

Figure 4: LEP Touch Points

Drivers	Frequently
Customer Service Representatives - Phone	Occasionally
Transit Center Representatives	Frequently
Dispatchers/Road Supervisors	Occasionally
Interior cards	Frequently
On-street signage	Frequently
Website	Occasionally
Receptionist	Occasionally
Print media	Occasionally
Broadcast media	Occasionally
Public Relations media	Occasionally

Because of the lack of comprehensive and reliable LEP contact data, COTPA is seeking a way to capture and report this data efficiently and effectively on a regular basis. There is also a need for an effective training program to help front-line employees work with LEP customers. The training initiatives could include multi-cultural awareness, how to work with non-English speaking passengers, language lessons and opportunities to help design language materials for use in the field.

FACTOR 3: The nature and importance of programs, activities or services provided by COTPA to the LEP population.

The largest geographic concentration of LEP individuals in the COTPA service area is Spanish. Vietnamese and Chinese are the second and third largest LEP groups. Services provided by COTPA that are most likely to encounter LEP individuals are the fixed-route bus system which serves the general public and the ADA paratransit system which serves seniors and persons with disabilities. It is also likely that COTPA will encounter LEP individuals at the Downtown Transit Center as well as at public meetings held by COTPA for information purposes.

To address Factor 3, COTPA staff contacted various community organizations. These included the Hispanic Chamber of Commerce, Latino Community Development Agency, Asian Society of Oklahoma, Oklahoma Chinese Cultural Foundation, Vietnamese American Association, Catholic Charities and Oklahoma City Public School System. COTPA also conducted community meetings and surveys in 2012-2013 to find out how often LEP customers rode, for what purposes, problems encountered and suggestions for improvement. In the context of Factor 3, COTPA's most critical services were defined as How to Ride Instructions, Fares and Tickets, Routes and Schedules and Public Meetings. These areas were chosen because language barriers in these areas could limit a person's ability to gain the full benefit from services.

COTPA conducted meetings at the Vietnamese American Association in concert with Catholic Charities where many LEP refugees participated, mostly from Myanmar.

COTPA also collected information from the Latino Community Development Agency about Spanish LEP individuals and provided surveys during their Health Fair and other community gatherings. Large turnouts indicated that COTPA services are very important for them. However, many of them usually do not ride the buses because they own a vehicle or they use friends and/or family for a ride.

COTPA staff was not successful in meeting with any Vietnamese or Chinese LEP individuals. It was learned from their community leaders that Vietnamese and Chinese population are scattered throughout the region and they seldom gather as a group. Furthermore, there are not many Vietnamese or Chinese who ride buses because they own transportation or they have friends and family who provide a ride. COTPA is working to improve the perceptions of public transportation among many minority groups by promoting its services in different languages.

COTPA programs and services are very important to LEP community members. Most of the Spanish speaking persons mentioned that they wanted to ride public transit and rely on transit for almost all of their travel in the region, such as to and from work, school, doctor's visits and shopping. Many LEP persons of other languages said they did not know how to ride and because of this fear they choose not to utilize transit regularly.

The primary frustrations LEP persons experienced with COTPA bus service were consistent with those experienced by other EMBARK riders such as: limited bus service in the evening, no fixed-route buses on Sunday, long wait times and unfamiliarity with passes and fare structures. However, language barriers inhibited satisfactory resolution of LEP customer issues.

Most participants were unaware of the COTPA website which provides Google Translation. Thus, few if any had ever made use of that service.

Many LEP customers were new to the country and/or do not understand English well and rely heavily on family, friends and trusted community organizations to help them adapt and find their way.

For many LEP individuals, resolving customer concerns is hindered by the language barriers between them and COTPA personnel. A "How to Ride" training will benefit LEP individuals and thus, encourage them to ride. Furthermore, promoting COTPA services in different languages will help gain the confidence among non-English speaking riders and create a strong customer relationship with the LEP communities.

FACTOR 4: The resources available to COTPA and overall cost to provide LEP assistance.

Like most public agencies, COTPA's budget is constrained by several factors. Nevertheless, COTPA devotes staff time and funding for LEP implementation. All projects, whether service or capital in nature, are required to consider the cost for implementing accessible (including LEP) accommodations in its initial budget. Those accommodations include, but not limited to:

- Signage inside and around transit facilities and inside vehicles
- Accessible technology solutions (applications, website, etc.)
- Planning services (LEP market surveys, etc.)
- Administrative service for translators, translation services

Production costs for design, audio and braille materials

On an ongoing basis, COTPA evaluates its resources for availability and its ability to positively support LEP persons. Staff strives to develop relationships with vendors capable of providing a full range of services at reasonable costs. Figure 5 illustrates the estimated annual cost for language assistance to LEP persons.

Figure 5: Estimated annual cost for providing LEP services

Advertisements (various media)	\$ 10,000
Translation/Translator Costs	\$ 4,000
Printing	\$ 6,000
Misc.	\$ 2,000
Total	\$ 22,000

LEP ASSESSMENT

Based on the four-factor analysis, COTPA developed its LEP Language Assistance Plan as outlined in the following section. COTPA has developed this LEP Assessment Plan to address and monitor transit services provided to LEP population. U.S. 2010 Census information is used to identify Census Tracts with a significant LEP population within COTPA's service area. The majority of the LEP population speaks Spanish. However, Vietnamese and Chinese are the other two languages falling within the "Safe Harbor" written materials provision. Thus, this plan will address Spanish along with Vietnamese and Chinese speaking LEP populations. The following six elements are included in this plan:

- 1. Identification of the LEP individuals
- 2. Language assistance measures
- 3. Staff training
- 4. Notification of service to LEP population
- 5. Monitoring and updating procedure
- 6. Dissemination of the COTPA LEP Plan

Identification of LEP individuals who need language assistance

Given the large size of the Spanish-speaking LEP population, this will be the first group of focus. COTPA will also seek to reach out and communicate with Vietnamese and Chinese speaking LEP customers in order to comply with the "Safe Harbor" provision.

How COTPA may identify an LEP person who needs language assistance:

 Examine customer service records for language assistance that have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events.

- When sponsoring an event, have a staff person greet participants as they arrive. By informally engaging participants in conversation it is possible to informally gauge each attendee's ability to speak and understand English.
- Have Census Bureau Language Identification Flashcards available at events near the registration table. Individuals self-identifying as persons not proficient in English may not be able to be accommodated with translation assistance at the event, but it will assist in identifying language assistance needs for future events.
- Work closely with the Association of Central Oklahoma Governments (ACOG), the regional Metropolitan Planning Organization (MPO), on maps and Census data as well as any language assistance they may have had requested during transportation planning events.

Language Assistance Measures

How COTPA will assist an LEP person who needs language assistance:

- Provide vital information to LEP groups on COTPA programs and services through its Hispanic education and outreach program
- Start an outreach program in Vietnamese and Chinese languages
- Provide a bilingual customer service representative, if available, at community events, public hearings and on an as needed basis
- Place statements in notices and publications that interpreter services are available for meetings, with seven business day advance notice
- Survey bus operators and other front-line staff, on their experience concerning any contacts with LEP persons
- Provide language assistance materials at various properties of COTPA, such as the Transit Center and COTPA Administrative facilities
- Post the Title VI Policy and LEP Plan on COTPA's website www.embarkok.com where LEP persons may also use Google Translation to translate the policy and plan into their languages
- Provide group "How to Ride" training to LEP persons with the assistance of bilingual staff and/or interpreters
- Access language assistance services from professional translation services or qualified community volunteers

COTPA has hired a bilingual customer service representative to support callers in Spanish. In addition, one customer service representative attended the Bilingual Certification Program offered through the City of Oklahoma City. The customer information line is equipped with a telephone prompt that will direct Spanish speaking customers to a Spanish speaking customer service representative. Customer service representatives can also serve as a translator when a Spanish speaking customer and a non-Spanish speaking employee are trying to communicate. The representative can help by phone, in person or via hand-held radio. It is COTPA's intent to continually staff with an adequate number of qualified Spanish speaking personnel to better serve the Spanish speaking transit users.

COTPA currently does not have any Vietnamese or Chinese speaking staff at the call center. However, in order to provide the language assistance in different languages, COTPA does retain assistance from a professional translator service. COTPA is exploring the available technology and costs for transferring and translating calls into

different languages. COTPA already integrated Google translation on its website where routes, schedules, notices and other documents can be translated into a variety of languages including Spanish, Vietnamese and Chinese.

A "How to Ride the Bus" is available in Spanish on the system map and is distributed at events where attendees are Spanish speaking. A Spanish speaking representative also attends to answer questions. With sufficient notice, most all print materials are available by mail or by email, in Spanish, Vietnamese or Chinese. COTPA provides public notices for route changes in Spanish and may begin providing notices in Vietnamese and Chinese.

Automated Vehicle Location (AVL) system was recently installed all COTPA fixed-route and paratransit vehicles. It includes an Automated Voice Announcing system that announces major stops.

Staff Training

Staff has been trained on what to do if an LEP person needs assistance and they are unable to help due to language barriers. COTPA has retained a language translating firm to provide assistance with language barriers.

How COTPA will train staff on its role and responsibilities in providing meaningful access to services for LEP persons:

- Develop curriculum to educate COTPA staff on the Title VI/LEP requirements for providing meaningful access to services for LEP persons
- Provide staff with a description of language assistance services offered by COTPA
- Provide staff with specific procedures to be followed when encountering an LEP person, including how to handle a potential Title VI/LEP complaint
- Instruct staff on the use of COTPA language assistance materials, such as Google Translation

Notice of Service to LEP Population

COTPA works closely with a Spanish radio station, doing radio campaigns and interviews describing its services. COTPA also works with Telemundo TV, a Spanish television station. Airtime includes an educational program as well as television advertisement. In addition, customer service representatives also attend events in which Spanish speaking persons attend. Staff visits with attendees and pass out the "How to Ride" Spanish brochure. Similarly, COTPA will use Vietnamese and Chinese media to promote its services, notices and meetings in these languages.

The agency's website - embarkok.com - is equipped with Google Translation Services which allows all non-image based content to be translated into nearly any language. The website includes routes, schedules and fare information for the bus system. In addition, general information, information on jobs, doing business with COTPA and information on programs and services are also included.

How COTPA will provide Notice to LEP Persons, both oral and written communications

- Offer general information, such as operation hours of the Transit Center/Administrative Offices, Fares and Lost and Found on the COTPA customer service line
- Use an automated greeting in both Spanish and English, directing callers to select which language they prefer
- Explore the possibilities of directing callers in other languages to a professional translation provider
- Continue to use the services of a professional translation provider or bilingual staff to ensure that vital documents are accurate (vital documents are defined as those documents without which a person would be unable to access services)
- Use written communications that will be available on an as needed basis in Spanish, Vietnamese and Chinese:
- COTPA brochures which contain information on fares, accessibility, locations where tickets and passes are sold and general riding information
- Onboard "take one" flyers containing information about route changes, fare increases and public hearings
- Various outlets where COTPA may display safety or system policy information
- Various outlets where COTPA may display cash fare, cost of monthly discount passes and special promotions/campaigns
- Onboard surveys
- Provide information upon request in Spanish or other languages about COTPA's non- discrimination policies and information on local/federal complaint processes
- Provide a tagline affirming that COTPA will make reasonable accommodations to translate any materials into Spanish, Vietnamese and Chinese and to provide an interpreter at public hearings and meetings

Monitoring and updating procedures

This plan is designed to be flexible and should be viewed as a work in progress. As such, it is important to consider whether new documents and services need to be made accessible for LEP persons, and also to monitor changes in demographics and types of services. COTPA will update the LEP Plan as required by the U.S. DOT. At a minimum, the plan will be reviewed and updated when newer Census data is available, or when it is clear that higher concentrations of LEP individuals are present in the COTPA service area.

How COTPA will examine and update its LEP Plan:

- Record and report on the number of LEP persons encountered annually through COTPA's outreach programs in different languages
- Determine how the needs of LEP persons have been addressed
- Determine the current LEP population in the service area and whether the need for translation services has changed
- Determine whether local language assistance programs have been effective and sufficient to meet the need
- Determine whether COTPA's financial resources are sufficient to fund language assistance resources as needed
- Determine whether COTPA and its contractors have fully complied with the goals
 of this LEP Plan

- Determine whether complaints have been received concerning COTPA's attempts to meet the needs of LEP individuals
- Obtain input from customers and the general community via COTPA's focus groups and surveys

COTPA has already established monitoring procedures to improve services provided to its Spanish speaking LEP customers. COTPA is currently exploring how to incorporate a similar monitoring system for other languages, including Vietnamese and Chinese. These procedures are as follows:

Pre-assessment of verbal communication skills: Customer Service Representatives and operators with Spanish speaking ability are assessed on their Spanish language proficiency. Pronunciation, basic grammar, verb conjugation, proper use of feminine and masculine articles, sentence structure, vocabulary and use of formal business communication are some of the areas assessed.

Call Monitoring: A full-time Spanish speaking Customer Service Representative is available if questions/problems arise. If unavailable, at the time of the call, the caller simply leaves a message and the Spanish speaking Customer Service Representative will return the call.

Language Services in Vietnamese and Chinese: COTPA has not received any calls from Vietnamese only or Chinese only speaking persons. However, COTPA is committed to provide access of its services to all LEP persons and is currently exploring the possibilities of contracting a professional language translating service.

Dissemination of the COTPA LEP Plan

How the COTPA LEP Plan will be disseminated to customers and the community:

- Any person or agency may request a copy of the complete plan via phone, fax, mail, e-mail or in person, and shall be provided a copy of the complete plan at no cost.
- The COTPA LEP Plan and the Title VI program update is available at www.embarkok.com.
- COTPA's LEP Plan will also be shared with human service organizations in its service area.
- LEP individuals may request copies of the plan in translation which COTPA will provide, if available.

Questions or comments regarding the LEP Plan may be submitted to COTPA as follows:

COTPA Title VI Coordinator 2000 S May Ave Oklahoma City, OK 73108 Phone: (405) 297-2104

Fax: (405) 316-1889

APPENDIX C

SUBRECIPIENT MONITORING - CITY OF EDMOND TITLE VI PLAN (2017)



CITY OF EDMOND, OK

FY 2017 Title VI/Nondiscrimination Plan For Sub-recipients

Date filed with FTA 5310 Transportation:

JULY 27, 2017 DATE

Nondiscrimination Assurances

The City of Edmond agrees to comply with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. 200d *et seq.*, and with U.S. DOT regulations, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act," 49 CFR part 21.

The City of Edmond assures that no person shall, as provided by Federal and State civil rights laws, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity. The City of Edmond further ensures every effort will be made to ensure non-discrimination in all programs and activities, whether those programs and activities are federally funded or not.

The City of Edmond meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including the City of Edmond and its third-party contractors by promoting actions that:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- B. Identify and address, as appropriate, disproportionally high and adverse effects of programs and activities on minority populations and low-income populations.
- C. Promote the full and fair participation of all affected Title VI populations in transportation decision making.
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.

E. Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

Steve Commons

Assistant City Manager

Subrecipient's General Information

1. Provide subrecipient's mission statement

The City of Edmond assures that no person or groups of persons shall, on the grounds of race, color, national origin, sex, age, religion, disability/handicap, or income status, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and other pertinent federal non-discrimination directives, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by the City of Edmond. The City further assures every effort will be made to ensure nondiscrimination in programs and activities, whether they receive federal financial aid or not.

2. History (including year started)

The City of Edmond created its transit system "Citylink" July 1, 2009. The total hours operated by the Central Oklahoma Transit Authority (COTPA) the year before, was approximately 12,300 hours with a ridership of 68,159. By the end of the year July 1, 2009 to July 30, 2010, Citylink's revenue hours were 16,052 with a ridership of 109,156, and it has continued to grow.

The paratransit for METRO (COTPA) was averaging 2,300 annual trips. Citylink's first year averaged 3,520. The reasoning behind the city creating its own system was to have more control over providing availability and reliability for the system. The City of Edmond was growing, and continues to grow, so providing a reliable transit system to residents for work, shopping, medical appointments and recreation is important.

Citylink started with five (5) fixed routes and after studying the routes, it was cut to 4 fixed routes, a commuter route and a paratransit service. The paratransit service started citywide and grew in cost until the City could no longer support such a large service area. Currently, the paratransit route service area covers three-quarters of a mile from the fixed route.

The highest year of ridership was 2014-2015 when gas prices were higher; 290,939 riders used Citylink that year. The ridership has leveled off at approximately 250,000/year with gas prices down.

3. Regional Profile (regional population; growth projection)

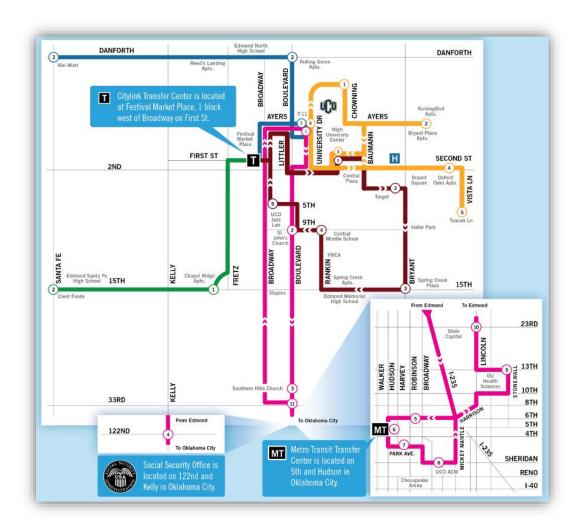
The City of Edmond is a northern suburb of Oklahoma City, OK. The regional population of the metropolitan statistical area (MSA) was 1,142,338 in 2010. The Counties that make up the MSA are Oklahoma, Cleveland, Canadian, Grady, Logan, McClain, and Lincoln. According to the Association of Central Oklahoma Governments (ACOG), the projected growth for the region is 1,595,168 for the year 2040. The Edmond population, according to the Edmond Economic Development Authority (EEDA) was 91,743 in 2016, and is expected to reach 101,596 by 2021.

4. Population served (in relation to regional population)

In relation to the regional population for the seven county MSA, the population of the City of Edmond is about 8% of the total population. Another method of seeing the population served is to look more specifically at the where Citylink routes are located and use the ¾ mile service area surrounding those routes. Using a ¾ mile service area around the routes in Edmond there are 4,118 apartment units, 884 townhouses, 1,041 duplexes, 708 mobile homes, and 13,738 single family residences. Using 2.54 persons and 2.24 persons per household for single family and multifamily, respectively, the total population served is estimated at 52, 826.

The total number of trips from fiscal year 2017 was 246,557.

5. Service area (include map, with any routes identified)



6. Designated Title VI Coordinator (include name, contact information, attendance dates to Title VI trainings)

Phil Jones
Sustainability/ADA Coordinator
City of Edmond Planning Department
Edmond, OK 73034
phil.jones@edmondok.com

Title VI Training

Opportunity and Growth Civil Rights Conference ODOT – February 27, 2015

7. Governing body make-up (include terms of office)

The governing body, namely the City Council, for the City of Edmond is as follows:

Charles Lamb, Mayor Term Expires: May 2019

Victoria Caldwell, Ward 1 Term Expires: May 2019

Elizabeth Waner, Ward 2 Term Expires: May 2019

Darrell Davis, Ward 3 Term Expires: May 2021

Nick Massey, Ward 4 Term Expires: May 2021



TITLE VI OF THE CIVIL RIGHTS ACT OF 1964 AS AMENDED AND 49 CFR PART 21 ENSURE THAT NO PERSON SHALL ON THE GROUNDS OF RACE, COLOR, OR NATIONAL ORIGIN, BE EXCLUDED FROM PARTICIPATING IN, OR BE DENIED THE BENEFITS OF, OR BE SUBJECT TO DISCRIMINATION UNDER ANY PROGRAM OR ACTIVITY RECEIVING FEDERAL FINANCIAL ASSISTANCE WITHOUT REGARD TO WHETHER SPECIFIC PROJECTS OR SERVICES ARE FEDERALLY FUNDED

For more information about the Title VI Civil Rights Program, please visit www.okdhs.org, click on the 'offices and locations' tab, and Office of Civil Rights. You may also contact Aging Services Division, 5310 Transportation staff at (405) 521-2281.

Who May file a Complaint?

Any person who feels that his/her request for access to transportation was denied because of discrimination as described above. He/she must file the complaint and provide contact information within 180 days following the incident by:

E-mail to: OKDHS/ASD/5310 Transportation Program at

Patricia.Heer@okdhs.org.

Fax to: OKDHS/ASD/5310 Transportation Program at

(405) 522-6738

Mail to: OKDHS/ASD/5310 Transportation Program

2401 N.W. 23rd, Suite 40, Oklahoma City, OK 73107

If information is needed in another language, call 405-359-4518.

Procedures for Filing a Complaint

The complaint procedures apply to the beneficiaries of the City of Edmond's programs, activities, and services.

<u>RIGHT TO FILE A COMPLAINT</u>: Any person who believes they have been discriminated against on the basis of race, color, or national origin by the City of Edmond may file a Title VI complaint by completing and submitting the agency's **Title VI Complaint Form**. Title VI complaints must be received in writing within 180 days of the alleged discriminatory complaint.

<u>HOW TO FILE A COMPLAINT</u>: Information on how to file a Title VI complaint is posted on our agency's website, and in public areas of our agency.

You may download the City of Edmond Title VI Complaint Form at www.edmondok.com/civilrights, or request a copy by writing to ADA Coordinator, 10 S. Littler, Edmond, OK. 73034. Information on how to file a Title VI complaint may also be obtained by calling the ADA Coordinator at 405-359-4518.

You may file a signed, dated complaint no more than 180 days from the date of the alleged incident. The complaint should include:

- Your name, address and telephone number;
- Specific, detailed information (how, why, and when) about the alleged act of discrimination; and
- Any other relevant information, including the names of any persons, if known, the agency should contact for clarity of the allegations.

Please submit your complaint form to ADA Coordinator, Planning Department, Title VI, 10 S Littler, Edmond, OK 73034.

<u>COMPLAINT ACCEPTANCE</u>: The City of Edmond will process complaints that are complete. Once a completed Title VI Complaint Form is received, the City of Edmond will review it to determine if the City has jurisdiction. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by the City of Edmond.

<u>INVESTIGATIONS</u>: The City of Edmond will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, the City may contact the complainant. Unless a longer period is specified by the City, the complainant will have ten (10) days from the date of the letter to send requested information to the City investigator assigned to the case.

If the requested information is not received within that timeframe the case will be closed. Also, a case can be administratively closed if the complainant no longer wishes to pursue the case.

<u>LETTERS OF CLOSURE OR FINDING</u>: After the Title VI investigator reviews the complaint, the Title VI investigator will issue one of two letters to the complainant: a closure letter or letter of finding (LOF).

Attachment D

- A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- A Letter of Finding (LOF) summarizes the allegations and provides an explanation of the corrective action taken.

If the complainant disagrees with the City of Edmond determination, the complainant may request reconsideration by submitting the request in writing to the Title VI investigator within seven (7) days after the date of the letter of closure or letter of finding, stating with specificity the basis for the reconsideration. The City of Edmond will notify the complainant of the decision either to accept or reject the request for reconsideration within ten (10) days. In cases where reconsideration is granted, The City of Edmond will issue a determination letter to the complainant upon completion of the reconsideration review.

If information is needed in another language, contact the City of Edmond, ADA Coordinator, Planning Department (Title VI), 10 S Littler, Edmond, OK 73034, or at 405-359-4518.

City of Edmond Complaints Form

"No person in the United States shall, on the basis of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

If you feel that you have been discriminated against in the provision of transportation services, please provide the following information to assist us in processing your complaint. Should you require any assistance in completing this form or need information in alternate formats, please let us know.

Please mail or return this form to:
City of Edmond Planning Department
Phil Jones
10 S Littler St
Edmond, OK 73034
Phil.jones@edmondok.com
405-359-4518

PLEASE PRINT

Co	mplainant's Name:
a.	Address:
b.	City: State: Zip Code:
c.	Telephone (include area code): Home () or Cell () Work
	() -
d.	Electronic mail (e-mail) address:
	Do you prefer to be contacted by this e-mail address? () YES () NO
Ac	cessible Format of Form Needed? () YES specify: () NO
Ar	e you filing this complaint on your own behalf? () YES If YES, please go to question 7.
(NO If no, please go to question 4
۱f	you answered NO to question 3 above, please provide your name and address.
a.	Name of Person Filing Complaint:
b.	Address:
c.	City: State: Zip code:
d.	Telephone (include area code): Home () or Cell () Work
	() -
e.	Electronic mail (e-mail) address:
	Do you prefer to be contacted by this e-mail address? () YES () NO
Wł	nat is your relationship to the person for whom you are filing the complaint?
Ple	ase confirm that you have obtained the permission of the aggrieved party if you are filing on
be	half of a third party. () YES, I have permission. () NO, I do not have permission.
Ιb	elieve that the discrimination I experienced was based on (check all that apply):
(Race () Color () National Origin (classes protected by Title VI)
(Other (please specify)
	a. b. c. Acc Ar () b. c. d. Plee

Continued

Attachment E

8.	8. Date of Alleged Discrimination (Month, Day, Year):	
9.	9. Where did the Alleged Discrimination take place?	
10.	10. Explain as clearly as possible what happened and why you believe that you were discrimir	
	against. Describe all of the persons that were involved. Include the name and contact inf	
	of the person(s) who discriminated against you (if known). Use the back of this form or sep	oarate
	pages if additional space is required.	
11.	11. Please list any and all witnesses' names and phone numbers/contact information. <i>Use the</i>	e back of
	this form or separate pages if additional space is required.	
4.0	40 144	
12.	12. What type of corrective action would you like to see taken?	
4.2	40 11 - 11 - 11 - 11 - 11 - 11 - 11 - 11	
13.	13. Have you filed a complaint with any other Federal, State, or local agency, or with any Fede	erai or
	State court? () YES If yes, check all that apply. () NO	
	a. () Federal Agency (List agency's name)	
	b. () Federal Court (Please provide location)	
	c. () State Court	
	d. () State Agency (Specify Agency)	
	e. () County Court (Specify Court and County) f. () Local Agency (Specify Agency)	
1.1	14. If YES to question 14 above, please provide information about a contact person at the age	nov/court
14.	where the complaint was filed.	ricy/court
	Name: Title:	
	Agency: Telephone: () -	
	Address:	
	City: State: Zip Code:	
Voi	You may attach any written materials or other information that you think is relevant to your c	omnlaint
100	Tou may actach any written materials of other information that you think is relevant to your c	ompiami.
Sigr	Signature and date is required:	
9,8,	Signature and date is required.	
Sign	Signature Date	
.م.		
If vo	If you completed Questions 4, 5 and 6, your signature and date is required:	
,`	,	
Sigr	Signature Date	

Documenting Complaints, Investigations, and Lawsuits

All Title VI complaints will be entered and tracked in City of Edmond complaint log. Active investigations will be monitored for timely response on the part of all parties. The agency's Title VI Coordinator shall maintain the log.

City of Edmond Title VI Complaints, Investigations, and Lawsuits Log

Date		Basis of	Summary	Pending	A -11	Closure	Letter of	D.1 (
complaint		complaint	of	status of	Actions	Letter	Finding	Date of
filed	Complainant	R-C-NO	allegation	complaint	taken	(CL)	(LOF)	CL or LOF

Documenting Evidence of Agency Staff Title VI Training

City of Edmond staff are given Title VI training, and can answer affirmatively to all the following questions:

- Are new employees made aware of Title VI responsibilities pertaining to their specific duties?
- Do new employees receive this information via employee orientation?
- Is Title VI information provided to all employees and program applicants?
- Is Title VI information prominently displayed in the agency and on distributed program materials, as necessary?

City of Edmond Limited English Proficiency Plan

Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address City of Edmond responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964; Federal Transit Administration Circular 4702.1B, dated October 1, 2012, which states that the level and quality of transportation service is provided without regard to race, color, or national origin.

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency", indicates that differing treatment based upon a person's inability to speak, read, write or understands English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including all City of Edmond departments receiving federal grant funds.

The City of Edmond has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with LEP who wish to access services provided. As defined Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

LEP Four Factor Analysis

In order to prepare this plan, the City of Edmond used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to require City of Edmond services.

The City of Edmond staff reviewed the current U.S. census report and determined that in the City of Edmond's service area 5,613 persons over the age of 5 years old (6.95%) of the population speaks a language other than English. Of those 5,613 persons 1,899 (33.8%) have limited English proficiency; that is, they speak English "not well" or "not at all", this is 2.35% of the overall population in the service area. In the City of Edmond service area, of those persons with limited English proficiency, 683 speak Spanish, 267 speak other Indo-European languages, and 949 speak Asian or other Pacific Islander Languages.

2. The frequency with which LEP persons come in contact with City of Edmond services.

The City of Edmond staff reviewed the frequency by which Edmond staff has contact with LEP persons. Though the City doesn't have precise numbers, some of the details for a municipal survey conducted in 2015 are provided below to indicate those frequencies. To date, the City of Edmond has received 0 requests for translated programs and documents. We do have documented evidence, however, collected through the survey in 2015, which indicates there are incidents where LEP assistance is needed.

3. The nature and importance of services provided by the City of Edmond to the LEP population.

There is no large geographic concentration of any type of LEP individuals in the City of Edmond, OK. The overwhelming majority of the population, 93.06%, speak only English. As a result, there are few social, service, professional and leadership organizations within the City's service area that focus on outreach to LEP individuals. However, the City has made the effort to reach out to LEP individuals by providing brochures to City staff for the purpose of providing professional interpreter services. In the LEP Customer Contact Survey (2015), 32% of the respondents that identified contact with LEP customers were from the Police and Fire Departments. 27% of the respondents were from Electric, Engineering, Parks, Public Works, and Utility Customer Service. Roughly 50% of those that responded to the City staff survey answered "Yes" to the question on whether they had the need of a translator or interpreter for public interactions.

4. The resources available to the City of Edmond and the overall costs to provide LEP assistance.

The City of Edmond reviewed available resources that could be used for providing LEP assistance and is reviewing which documents would be most valuable translated, when the need should arise. The LEP Assistance brochures, distributed among employees, cost the City \$470 to publish through a local publisher. The City of Edmond has contracted with Language Services Associates (LSA) to provide written language translation when needed. Oral language translation is provided through a telephone interpreter line for which the City of Edmond pays a fee, also through LSA. The City also uses Sign Language Resource Services for deaf person's interpretation. Below are contract fees with LSA to provide LEP telephone interpretation.

Interpreting by Telephone (Over 200 Languages)	Rate			
	General	Medical	Legal	Education
Spanish (Per Minute)	\$0.65	\$0.75	\$0.85	\$0.70
All Other Languages (Per Minute)	\$0.70	\$0.75	\$0.85	\$0.70

Attachment G

Based on the Four Factor Analysis:

Based on the Four Factor Analysis, our research shows that in the City of Edmond service area, we **do** meet the minimum requirement of 5% or 1,000 individuals whichever is less. There are an estimated 1,899 residents that have Limited English Proficiency. Therefore, an LEP Plan is required. Listed below is the resource used to obtain information pertaining to LEP individuals in Edmond, OK.

Resource:

US Bureau of Census: American Community Survey 2011-2015 (5-Year Data),

Table B16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over.

Attachment G

The City of Edmond agrees to the following requirements of an LEP Plan as mentioned below:

Language Assistance

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to the City of Edmond's services. Language assistance can include interpretation, which means oral or spoken transfer of a message from on language into another language and/or translation, which means the written transfer of a message from one language into another language.

City of Edmond staff will identify persons who speak English "not well" or "not at all" by:

- Posting notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- Providing "I Speak" cards to assist in identifying the language interpretation needed if the occasion arises.
- Informally surveying experiences concerning any contacts with LEP persons during the previous year.

Offering a translator (LEP) or interpreter (sign language for hearing impaired individuals) at informational meetings or events. Language interpretation will be accessed for all other languages through a telephone interpretation service. By informally engaging meeting participants in conversation, it is possible to gauge each attendee's ability to speak and understand English. Although translation may not be able to be provided at the event, it will help identify the need for future events.

Staff Training

The following training will be provided to all City of Edmond staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of languages assistance services offered to the public.
- Use of "I Speak" cards.
- Documentation of language assistance requests.
- How to handle a potential Title VI / LEP complaint.

All contractors or subcontractors performing work for the City of Edmond will be required to follow the Title VI / LEP guidelines.

Translation of Documents

The City of Edmond has weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, at this time it is an unnecessary burden to have any documents translated.

Due to the small local LEP population, the City of Edmond does not have a formal outreach procedure in place, as of 2017. However, when the need arises for more LEP outreach, the City of Edmond provides the following option.

• When staff prepares a document, or schedules a meeting, for which the target audience is expected to included LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

Monitoring and Updating the LEP Plan

The City of Edmond will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when data from the next U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in Edmond's service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- The current LEP population in the service area.
- Whether the need for translation services has changed.
- Whether local language assistance programs have been effective and sufficient.
- Whether the City of Edmond's financial resources are sufficient to fund language assistance resources needed.
- Whether the City of Edmond fully complies with the goals of this LEP Plan.
- Whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.
- A Title VI complaint log, including LEP to determine issues and basis of complaints.

Attachment G

Dissemination of the City of Edmond LEP Plan

The City of Edmond will notify LEP persons of the LEP Plan and how to access language services, by posting signs at conspicuous and accessible locations which may include but not limited to the following:

- City of Edmond Web Site
- City of Edmond City First Building (Administration)
- City of Edmond Planning and Public Works Building
- City of Edmond Crosstimber's Municipal Complex
- City of Edmond Public Safety Center
- City of Edmond Senior Center
- City of Edmond Utility Office
- City of Edmond Council Chambers Lobby
- City of Edmond Parks and Recreation Building
- City of Edmond Downtown Community Center

When vital to communications, the City will state on agendas and public notices in the language LEP persons would understand that documents can be made available in their language.

Public Participation Plan

Identification of City of Edmond Stakeholders by Race¹

Stakeholders	Caucasian	Latino	African American	Asian American	Total
City Council	4		1		5
Edmond Public Transportation Committee					7
Transit Riders/Clients					Avg. 20,546/mo
Private Businesses/ Organizations					
Others					

City of Edmond Outreach Practices

The City of Edmond ensures all outreach strategies, communications and public involvement efforts comply with Title VI. The City of Edmond Public Engagement Plan proactively initiates the public involvement process and makes concerted efforts to involve members of all social, economic, and ethnic groups in the public involvement process. Events such as public meetings and/or open houses are held at schools, churches, libraries and other non-profit locations easily accessible to public transit, convenient times, and compliant with the Americans with Disabilities Act.

Aligned with the above referenced communication tactics, the City of Edmond provides the following:

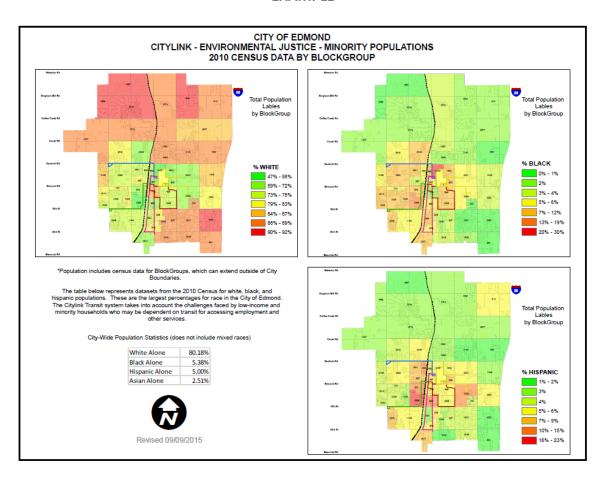
- a. Title VI non-discrimination notice on agency's website. www.edmondok.com/civilrights
- b. Agency communication materials in languages other than English.
- c. Services for Limited English Proficient persons. Upon advance notice, translators are provided.

¹ This table has been provided by the Oklahoma Department of Human Services. The City of Edmond will make every effort to include minority populations in its Public Engagement Processes for Title VI. Currently, however, we do not keep track of stakeholders by Race.

2014-2017 Title VI Program Public Engagement Process

Specifically for the 2014-2017 Title VI Plan, future engagement will be offered through public meetings associated with the Edmond Public Transportation Committee and the Community Development Block Grant Program. Should a change in City directives be required, then those will be addressed at public City Council meetings. Public engagement will include meetings to seek input, provide education, and highlight key components of the Title VI Plan. Materials have been created and can be provided to explain Title VI policies as well as provide education on how they relate to minority populations.

EXAMPLE



The City of Edmond will conduct a 30 day public comment period to provide opportunities for feedback on the next update for the Title VI Program. The current plan is available to the public on the City website at www.edmondok.com/civilrights.

Comments will be accepted during the public outreach period via adacoordinator@edmondok.com, Or mail to the City of Edmond, Planning Department (Title VI), Edmond, OK 73034.

This City of Edmond will provide a briefing to Edmond officials and elected representatives regarding all public comments prior to decision making. A publicly available summary report will be compiled, including all individual comments.

Summary of City of Edmond 2014-2017 Public Outreach Efforts

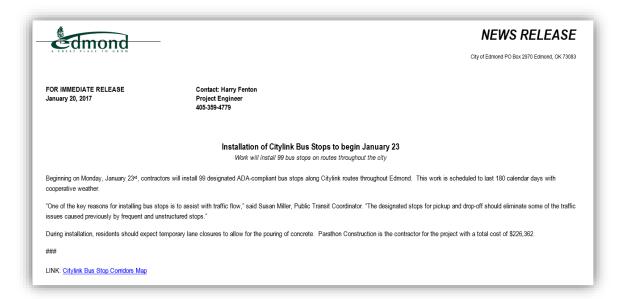
Facebook and Twitter Posts for Citylink

- 1. Jan 20, 2017 News Release for installation of ADA-compliant bus stops. (5,763 people reached)
- 2. Sept 13, 2016 Public Transit Survey (2,863 people reached)
- 3. Oct 1, 2015 Bus Routes impacted by homecoming parade downtown. (4,196 people reached)
- 4. Aug 18, 2015 Promotion of Citylink YouTube Video (13,729 people reached)
- 5. Feb 23, 2015 Announcement for delayed routes due to weather
- 6. Jan 16, 2015 Route Detour for Martin Luther King Day & Parade in Downtown OKC.

Citylink Website

http://www.edmondok.com/932/Citylink-Buses

Numerous informational items, notices and alerts are posted to this website.



Citylink Public Meetings

The Edmond Public Transportation Committee oversees Edmond's Citylink bus service, which includes the commuter Expresslink Service to Oklahoma City, several local fixed-routes, and the paratransit service. This oversight includes the Citylink operations, marketing and the local bus benches and shelters. The Committee makes recommendations to the City Council on public transit needs and the budget. Agendas are available before the meeting and this is open to the public.

Meetings are every other month, starting in 2017. There were (7) meetings in 2014, (5) meetings in 2015, (9) meetings in 2016, and (4) meetings in 2017 to-date.

We also held to public input meetings this year regarding the new bus stops. They were held two times during the day and evening to allow residents with different schedules the opportunity to attend. The dates for those meetings was June 29, 2017 and July 6, 2017.

Citylink Public Transit Survey



NEWS RELEASE

City of Edmond PO Box 2970 Edmond, OK 73083

FOR IMMEDIATE RELEASE September 13, 2016 Contact: Susan Miller Public Transit Coordinator 405-359-4694

City of Edmond Looking for Input on Citylink

Riders are asked to participate in a quick survey

The City of Edmond is conducting a Public Transit Survey in accordance with Federal Transit
Administration regulations to help improve public transportation in the city. The survey takes an in-depth
look at the Citylink bus service and identify opportunities to create a better transit network for the
community

All Citylink passengers are encouraged to complete the 25 question customer survey available online at citylinkedmond.com or passengers can pick up a paper copy of the survey from any Citylink driver. The survey will be active through October 7, 2016.

The results of the survey will be presented to the Edmond Public Transportation Committee and the City Council this fall.

Citylink, Edmond's fare-free public transportation service consists of four local routes, a commuter route that travels to and from Downtown Oklahoma City, and a paratransit service. Ridership has increased steadily since McDonald Transit began operating the service in 2009.

To view routes or download a Citylink schedule visit citylinkedmond.com or call 509-6370.

####

This is a Plan about safeguarding against discrimination of any kind, whether it is race, color, national origin, sex, age, religion, disability or income status, to ensure we are all given the opportunity to participate in City activities, and contribute to the vitality and enduring quality of our community.

Title VI Plan

City of Edmond, Oklahoma

February, 2017

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Policy Statement

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in all federally assisted programs. The focal point of nondiscrimination law is Title VI of the Civil Rights Act of 1964, however the broader application of nondiscrimination law may be found in other statutes, regulations, and executive orders.

The following is not an all-inclusive list, but demonstrates the intent of federal law as it relates to discrimination. The Federal-Aid Highway Act of 1973 (23 U.S.C 324) added sex and handicap as a protected status in all Federal Highway Administration activities. The Rehabilitation Act of 1973, as amended, also added the prohibition of discrimination based on handicap (29 U.S.C 794). The Age Discrimination Act of 1975, as amended, added age as a protected status (42 U.S.C. 6101). Title VI was later amended by the Civil Rights Restoration Act of 1987, which added Section 606, expanding the definition of the terms "programs or activities" to include all of the operations of an educational institution, government entity, or private employer that receives federal funds if any one operation receives federal funds.

The City of Edmond ensures that no person or groups of persons shall, on the grounds of race, color, national origin, sex, age, religion, disability/handicap, or income status be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by the City of Edmond, its recipients, sub-recipients, and contractors.

The City further assures that every effort will be made to ensure nondiscrimination in programs and activities that do not receive federal financial aid.

In the event that the City distributes federal aid funds to another entity, the City will include Title VI language in all written agreements and will monitor for compliance.

The City of Edmond ADA Coordinator (acting as Title VI liaison) is granted authority to administer and monitor the Title VI and Nondiscrimination Program as promulgated under Title VI of the Civil Rights Act of 1964 and subsequent legislation. The ADA Coordinator will provide assistance to departments, to the public, and to outside agencies as needed.

The City of Edmond delegates Title VI responsibilities to the department managers and charges them with the responsibility to develop and implement procedures and guides to adequately monitor their programs.

The City of Edmond recognizes the need for continuous Title VI training for Edmond staff.

Anyone who believes that he or she has been discriminated against should contact the Planning Department, Edmond Planning and Public Works, ADA Coordinator at 405-359-4790.

March 30, 2017

Larry Stevens Date
City Manager

Primary Authorities

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall on the grounds of race, color, national origin, or sex be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance:

Title VI of the Civil Rights Act of 1964, as amended. P.L. 88-352, 78 Stat. 252 (Nondiscrimination in Federally-Assisted Programs). (42 U.S.C. 2000d-2000d-4)

The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of terms "programs or activities" to include all programs or activities of Federal Aid recipients, sub-recipients, and contractors, whether such programs and activities are federally assisted or not.

The Civil Rights Restoration Act of 1987. P.L. 100-259

Objectives

The objectives of the City of Edmond's Title VI Plan are:

- To ensure that all persons, regardless of race, color, national origin, sex, age, religion, disability, or income status receive the benefits of City programs, services and activities.
- To ensure the City of Edmond complies with Title VI and to assign responsibilities for ensuring compliance.
- To promote full and fair participatory decision-making.
- To ensure that limited English proficient (LEP) individuals are provided meaningful access to City programs, services and activities.
- To establish clear procedures for filing, investigating, and successfully resolving complaints on a timely basis.

Statement on Limited English Proficiency

Edmond welcomes diversity in the community, and when needed, wants to take steps that ensure that those who come to Edmond can participate in and enjoy the fullness of all the City has to offer.

The City of Edmond is proud of its efforts to ensure that inclusion and fairness are a part of all of its activities. We are committed to Title VI, by extending its services and programs to all who wish to participate, including Limited English Proficiency (LEP) residents, to ensure that they are a part of the City's democratic processes.

March 30, 2017

Larry Stevens Date

City Manager

Organization and Compliance Responsibilities

City Manager

The City Manager for the City of Edmond is ultimately responsible for assuring full compliance with the provisions of Title VI of the Civil Rights Act of 1964 and has directed Nondiscrimination is required in all Edmond programs and services. The City Manager provides leadership, guidance, direction, and support for the City's Title VI Program.

Assistant City Manager

The City of Edmond has two Assistant City Managers. They have oversight responsibilities for 1) Public Works, 2) Water Resources, 3) Engineering, 4) Edmond Electric, 5) Planning and Zoning, 6) Public Transit, 7) Building Services, 8) Finance, 9) Human Resources, 10) Information Technology, 11) Community Image, and the 12) Parks and Recreation departments. These two positions ensure that departments are in compliance with the City's Title VI program. They must also enforce the provision that a Title VI clause is included in all contracts and on information distributed, or advertised, to the public.

ADA Coordinator

The ADA Coordinator (acting as Title VI liaison) is charged with the responsibility for implementing, monitoring, and ensuring that the City is in compliance with Title VI regulations. The ADA Coordinator will report directly to the Assistant City Manager of Operations. The ADA Coordinator's responsibilities include:

- a) **Program Administration** Process and coordinate the resolution of all Title VI complaints in accordance with the Title VI complaint procedure and time limitations. Ensure compliance with the assurances, policy, and program objectives. Act as liaison to the ODOT Title VI Coordinator, and perform Title VI program reviews to assess and update administrative procedures and resources; provide recommendations as required to the City Manager's Office and Mayor.
- b) **Data Collection** Review the statistical data gathering process performed by Title VI Program Area Liaisons (Departments) periodically to ensure sufficiency of data for meeting the requirements of the Title VI program. This includes such information as discrimination incidents, and City contacts with LEP customers and/or residents.
- c) Environmental Impact Statements Should the need arise, ensure that available census data is included as a part of all Environmental Impact Statements/Assessments (EIS/EIA) conducted by the City for projects receiving federal financial assistance.
- d) **Training Programs** Coordinate or facilitate training on Title VI, current and new regulations, for City employees, contractors and any sub-recipients. A summary of the training received will be reported in updates to ODOT (for Federal Highway Administration FHWA).
- e) **Title VI Plan Update** Review and update the Title VI Plan as needed or required. Present updated plan to the City Manager and Mayor for approval; submit amended Plan to ODOT (for FHWA) or other federal agencies as required.
- f) **Federally Required Reporting** The ADA Coordinator may periodically conduct reviews of the City's Title VI Program to assess for Title VI compliance, as well as any special emphasis programs reviewed with the Title VI designees annually to assure their effectiveness in

compliance with Title VI provisions. The ADA Coordinator will coordinate efforts to ensure that the requirements of Title VI are met.

- i. The ADA Coordinator will coordinate an Annual FHWA Title VI Update of Accomplishments to be submitted to ODOT (for FHWA) by October 1 of each year. The update will report on accomplishments and changes to the program during the preceding year, and will also include goals and objectives for the upcoming year.
- ii. The ADA Coordinator will coordinate with the Central Oklahoma Transportation Authority (COTPA) for the Triennial FTA Title VI Program Report to FTA to be submitted by the date outlined by the FTA.
- g) Public Dissemination Work with City staff to develop and disseminate Title VI program information to City employees and subrecipients, including contractors, subcontractors, consultants, and subconsultants and beneficiaries, as well as the general public. Public dissemination may include postings of official statements, inclusion of Title VI language in contracts or other agreements, website postings, and annual publication of the City's Title VI Policy Statement in newspaper(s) having a general circulation, and informational brochures. Ensure public service announcement or notices are posted for proposed projects, hearings, meetings, or formation of public advisory boards, in newspapers or other media reaching the affected community. Ensure the full utilization of available minority publications or media; and, where appropriate, provide written or verbal information in languages other than English. See Exhibit 1 for the City's Title VI Notice to the Public.
- h) Maintain Legislative and Procedural Information Federal laws, rules and regulations, ODOT guidelines, the current City of Edmond Title VI Plan, annual and triennial reports and other resource information pertaining to the implementation and administration of the City's Title VI program will be maintained and updated by the ADA Coordinator. Information will be made available to other agencies or the public as requested.
- i) **Complaints** Review and investigate Title VI complaints that may be received by the City of Edmond, following adopted procedural guidelines (see Exhibit 3 Complaint Procedures). Ensure every effort is made to resolve complaints at the local or regional level.
- j) Elimination of Discrimination Work with Departmental Liaisons to establish procedures for promptly resolving deficiencies, as needed. Recommend procedures to identify and eliminate discrimination that may be discovered in any City processes.
- **k) Special Programs** Coordinate support for targeted business programs, including small business enterprises (SBE), minority business enterprises (MBE), women business enterprises (WBE), and disadvantaged business enterprises (DBE) so that all businesses are afforded the maximum feasible opportunity to do business with the City.

City Department Responsibilities

Each department is responsible for the following. Department heads (Title VI program area managers) will ensure that this information is distributed to ensure the City remains compliant with Title VI.

- Ensure that all program area activities comply with Title VI;
- Assist the Title VI Coordinator in gathering and organizing the special program emphasis area section of the Annual Title VI Update Report;
- Hire interpreters, when needed, for translating vital documents. Each department is responsible
 for the costs incurred for their respective services. LEP and minority populations who will be
 affected by activities and projects must receive meaningful access into the public
 awareness/involvement process.
- Promote participation by and retain data on Disadvantaged Business Enterprises and Women and Minority Business Enterprises receiving City contracts;
- Provide supportive services, when needed, to small business enterprises (SBE), minority business enterprises (MBE), women business enterprises (WBE), and disadvantaged business enterprises (DBE).
- Ensure Title VI language is included in City contracts;
- Maintain required data to be incorporated in the Title VI Annual and Triennial Reports. The data gathering process will be reviewed regularly to ensure sufficiency of information to meet the requirements of the City's Title VI program administration.

Each of the following areas will be monitored by department heads (Title VI program area managers), or their designees for compliance with Title VI requirements.

- a. All advertisements.
- b. Bid proposals, requests, and evaluations.
- c. Contracts and subcontracts.
- d. Title VI reports, issues, and complaints.
- e. Public meetings and internal meetings relating to Title VI will be documented and reports forwarded to the ADA Coordinator.
- f. Title VI contract provisions and other legal documents.

Compliance with LEP Requirements

Inclusive Public Participation

We are committed to providing equal opportunities in all programs, services, and activities to persons with **limited English proficiency (LEP)**. Program access for LEP persons is covered in Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on national origin; these protections are further affirmed in Executive Order 13166.

Section 601 of the Title VI of the Civil Rights Act of 1964 provides that no person "on the ground of race, color, or national origin, be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." The United States Supreme Court in Lau v. Nichols (1974) stated that one type of national origin discrimination is discrimination based on a person's ability to speak, read, write, or understand English.

Executive Order 13166, "Improving Access to services for Persons with Limited English Proficiency" – requires Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them. It is expected that agency plans will provide for such meaningful access consistent with, and without unduly burdening, the fundamental mission of the agency. The Executive Order also requires that the Federal agencies work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

City of Edmond services include providing written translation and oral interpretation, free of cost, to LEP persons to ensure meaningful, accurate, and equal access to programs, benefits, and activities. We monitor the changing demographics and population trends on an annual basis to ensure awareness of the changing demographics and language needs in our City. We discourage the use of family members or friends as interpreters because this may violate the person's privacy and disclose sensitive and confidential information. It is our policy to inform all LEP customers of the right to free language assistance and interpreter services at no cost to the LEP customer. This policy also:

- Sets a standard for inclusive outreach
- Assigns responsibilities to departments
- Calls for the development of a toolkit to provide guidance to staff
- Requires that the plan receives periodic evaluation

In order to help identify persons of limited English proficiency, the City of Edmond refers to the US Bureau of Census: American Community Survey 2011 – 2015 (5- Year Data), **Table B16001**: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER. In the table, shown on the following page, **the City of Edmond considered people that speak English other than "very well" as Limited English Proficient persons**.

The first percentage column represents the average of the total number of a particular language spoken divided by the total population. The "<well" column represents the total number of person(s) that speaks English less than "very well." The last "percentage" column represents the amount of LEP individuals in each language.

LEP ASSESSMENT, American Community Survey (2011-2015), Edmond, Oklahoma LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POP. 5 YEARS AND OVER

	Total	%	< well	%
Population 5 years and over	80858			
Speak only English	75245	93.06%		
Spanish or Spanish Creole	1,958	2.42%	683	0.84%
French (incl. Patois, Cajun)	136	0.17%	0	0.00%
French Creole	50	0.06%	0	0.00%
Italian	27	0.03%	27	0.03%
Portuguese or Portuguese Creole	110	0.14%	21	0.03%
German	181	0.22%	0	0.00%
Yiddish	0	0.00%	0	0.00%
Other West Germanic languages	24	0.03%	0	0.00%
Scandinavian languages	0	0.00%	0	0.00%
Greek	0	0.00%	0	0.00%
Russian	13	0.02%	0	0.00%
Polish	59	0.07%	0	0.00%
Serbo-Croatian	0	0.00%	0	0.00%
Other Slavic languages	7	0.01%	0	0.00%
Armenian	16	0.02%	16	0.02%
Persian	152	0.19%	29	0.04%
Gujarathi	77	0.10%	34	0.04%
Hindi	28	0.03%	0	0.00%
Urdu	246	0.30%	31	0.04%
Other Indic languages	261	0.32%	109	0.13%
Other Indo-European languages	15	0.02%	0	0.00%
Chinese	513	0.63%	200	0.25%
Japanese	33	0.04%	12	0.01%
Korean	224	0.28%	146	0.18%
Mon-Khmer, Cambodian	25	0.03%	25	0.03%
Miao, Hmong	0	0.00%	0	0.00%
Thai	116	0.14%	60	0.07%
Laotian	0	0.00%	0	0.00%
Vietnamese	224	0.28%	60	0.07%
Other Asian lanuages	165	0.20%	48	0.06%
Tagalog	59	0.07%	28	0.03%
Other Pacific Island languages	55	0.07%	0	0.00%
Navajo	0	0.00%	0	0.00%
Other Native North American languages	39	0.05%	0	0.00%
Hungarian	0	0.00%	0	0.00%
Arabic	466	0.58%	347	0.43%
Hebrew	8	0.01%	0	0.00%
African languages	333	0.41%	23	0.03%
Other and unspecified languages	0	0.00%	0	0.00%

Determining the Need

This methodology is adopted from the ODOT Limited English Proficiency Assessment (2013).

Four Factor Analysis

Federally assisted recipients are required to take reasonable steps to ensure meaningful access to LEP persons. In order to determine the need, the City of Edmond uses the following **Four Factor Analysis** from the Department of Justice's "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons."

- 1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a City program, activity, or services;
- 2. The frequency with which LEP individuals come in contact with City programs, activities, or services:
- 3. The nature and importance of the programs, activities, or services provided by the City in people's lives; and
- 4. The resources available to the City of Edmond

The Four Factor Analysis is used to determine oral language assistance, while the **Safe Harbor** provisions are for written translations.

Safe Harbor

A "safe harbor" means that if a recipient provides written translations under these circumstances, such action will be considered strong evidence of compliance with the recipient's written-translation obligations under Title VI. The failure to provide written translations under the circumstances outlined in paragraphs (a) and (b) does not mean there is noncompliance. Rather these paragraphs merely provide a guide for recipients that would like greater certainty of compliance than can be provided by a fact-intensive, four-factor analysis.

- (a) The COE will provide written translations of vital documents for each eligible LEP language group that constitutes 5 percent or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally; or
- (b) If there are fewer than 50 persons in a language group that reaches the 5 percent trigger in (a), the recipient does not translate vital written materials but provides written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost. These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents
More than 5% of the eligible population or beneficiaries and more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries and 50 or less in number	Translated written notice of right to receive free oral interpretation of documents
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required.

Reasonable Accommodation

Currently, from the LEP assessment data (page 7), there is no population that reaches the threshold to recommend provision of written translations for vital documents. However, the City of Edmond will accommodate any individual that requests documents to be translated into another language, when needed, and continue to monitor the City's population for LEP persons. The City encourages participation from all its citizens. If participation in a Public meeting is not possible due to a disability or LEP, then notification to the City Clerk is requested at least **72 hours** prior to the scheduled meeting.

Language Assistance Plan (LAP)

The City of Edmond (COE) uses the following for oral language assistance services:

- A COE register was adopted from ODOT's database, which lists all current State approved vendors that can either assist in translating and/or interpreting¹;
- Ensure that all division receptionists have "I Speak" cards for individuals to identify their language needs for City of Edmond staff;
- Notices in local newspapers will document that assistance is available in other languages;
- Processes have been developed for receptionists in all departments on how to assist LEPs;
- Notification will be given to individuals about the availability of free language assistance.

¹ This is the link for State vendors: https://www.ok.gov/dcs/solicit/app/contractSearch.php. Enter the keyword "interpreter" to search for the State Contract.

Exhibits, Appendices and Attachments

EXHIBIT 1 — CITY OF EDMOND TITLE VI NOTICE TO THE PUBLIC

The City of Edmond ensures that no person or groups of persons shall, on the grounds of race, color, national origin, sex, age, religion, disability/handicap, or income status be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by the City of Edmond, its recipients, sub-recipients, and contractors.

EXHIBIT 2 – TITLE VI ASSURANCES

The City of Edmond (hereinafter referred to as the "Recipient") HEREBY AGREES THAT as a condition to receiving any Federal financial assistance from the Oklahoma Department of Transportation it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d-42 U.S.C. 2000d-4 (hereinafter referred to as the Act), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally - Assisted Programs of the Department of Transportation - Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the Regulations) and other pertinent directives, to the end that in accordance with the Act, Regulations, and other pertinent directives, no person in the United States shall, on the grounds of race, color, national origin, sex, age, religion, disability/handicap, or income status be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives Federal financial assistance from the Department of Transportation, including the Federal Highway Administration and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21.7(a) of the Regulations.

More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances with respect to its Federal Aid Highway Program:

- 1. That the Recipient agrees that each "program" and each "facility" as defined in subsections 21.23(e) and 21.23(b) of the Regulations, will be (with regard to a "program") conducted, or will be (with regard to a "facility") operated in compliance with all requirements imposed by, or pursuant to, the Regulations.
- 2. That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations and made in connection with the Federal Aid Highway Program and, in adapted form in all proposals for negotiated agreements:

The City of Edmond, in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation issued pursuant to such Act, and other pertinent federal non-discrimination directives, hereby notifies all bidders that it will affirmatively ensure that in any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, national origin, sex, age, religion, disability/handicap or income status in consideration for an award.

- 3. That the Recipient shall insert the clauses of **Appendix A** of this assurance in every contract subject to this Act and the Regulations.
- 4. That the clauses of **Appendix B** of this assurance shall be included, as a covenant running with the land, in any deed from the United States effecting a transfer of real property, structures, or improvements thereon, or interest therein.²
- 5. That where the Recipient receives federal financial assistance to construct a facility or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.
- 6. That where the Recipient receives federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over, or under such property.
- 7. That the Recipient shall include the appropriate clauses set forth in **Appendix C** of this assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by the Recipient with other parties (a) for the subsequent transfer of real property acquired or improved under the Federal-aid Highway Program; and (b) for the construction or use of, or access to space on, over, or under, real property acquired or improved under the Federal-aid Highway Program.
- 8. That this assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property or interest therein, or structures or improvements thereon; in which case the assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property used for a purpose for which the Federal financial assistance is extended; or for another purpose involving the provision of similar services or benefits; of (b) the period during which the Recipient retains ownership or possession of the property.

_

² Conditions (4-8) apply to Appendices B, C, and D.

- 9. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub grantees, contractors, subcontractors, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations and this assurance.
- 10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations and this assurance.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the Recipient by the Department of Transportation and is binding on it, other recipients, sub grantees, contractors, subcontractors, transferees, successors in interest and other participants in the grant program. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the Recipient.

March 30, 2017

Date

Appendix A

The City of Edmond will insert or add **Appendix A** and **Appendix E** into All contracts for services subject to the Act and Regulations (regardless of the use of federal funds). These are required.

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

1. Compliance with Regulations:

The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Federal Highway Administration (FHWA), as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.

2. Nondiscrimination:

The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, national origin, sex, age, religion, disability/handicap, or income status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.

3. Solicitations for Subcontracts, Including Procurement of Materials and Equipment:

In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to Non-discrimination on the grounds of race, color, or national origin.

4. Information and Reports:

The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the FHWA to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the FHWA, as appropriate, and will set forth what efforts it has made to obtain the information.

5. Sanctions for Noncompliance:

In the event of a contractor's noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the FHWA may determine to be appropriate, including, but not limited to:

a. withholding payments to the contractor under the contract until the contractor complies; and/or b. cancelling, terminating, or suspending a contract, in whole or in part.

6. <u>Incorporation of Provisions:</u>

The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or the FHWA may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

<->	the		
Signature		Date	

Appendix B

Clauses for Deeds Transferring United States Property

When the City of Edmond is the recipient of real property, structures or improvements thereon, or interest therein from the United States, the following clauses shall be included in any and all deeds affecting or recording the transfer of property:

Granting Clause

NOW, THEREFORE, the City of Edmond, as authorized by law, will accept title to the lands and maintain the project constructed thereon in accordance with the Consolidated and Further Continuing Appropriations Act, 2013 (Pub. L. 113-6, March 26, 2013), the Regulations for the Administration of FY 2013 TIGER Discretionary Grant Program, and the policies and procedures prescribed by the Federal Highway Administration (FHWA) of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the City of Edmond all the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit "A" attached hereto and made a part hereof.

Habendum Clause

TO HAVE AND TO HOLD said lands and interests therein unto the City of Edmond, and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on the City of Edmond, its successors and assigns.

The City of Edmond, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [,] [and] *(2) that the City of Edmond will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended[, and (3) that in the event of breach of any of the abovementioned non-discrimination conditions, the Department will have a right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction].*

^{*}Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to make clear the purpose of Title VI.

Appendix C

Clauses for Transfer of Real Property Acquired or Improved Under the Activity, Facility, or Program

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the Grantee pursuant to the provisions of Assurance 7(a):

The (grantee, lessee, permittee, etc. as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that:

A. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.

B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Non-discrimination covenants, Grantee will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.*

C. With respect to a deed, in the event of breach of any of the above Non-discrimination covenants, the Grantee will have the right to enter or re-enter the lands and facilities thereon, and the above described lands and facilities will there upon revert to and vest in and become the absolute property of the Grantee and its assigns.*

^{*}Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to make clear the purpose of Title VI.

Appendix D

Clauses for Construction/Use/Access to Real Property Acquired Under the Activity, Facility or Program

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by Grantee pursuant to the provisions of Assurance 7(b):

A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, "as a covenant running with the land") that (1) no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.

B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Non-discrimination covenants, Grantee will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.*

C. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, Grantee will there upon revert to and vest in and become the absolute property of Grantee and its assigns.*

^{*}Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to make clear the purpose of Title VI.

Appendix E

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees to comply with the following non-discrimination statutes and authorities; including but not limited to:

Pertinent Non-Discrimination Authorities:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*, 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. §
 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired
 because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 et seq.), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 *et seq.*), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, subrecipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of
 disability in the operation of public entities, public and private transportation systems, places of
 public accommodation, and certain testing entities (42 U.S.C. §§ 12131 12189) as implemented
 by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;

- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 et seq).

5 th		
Signature	Date	

EXHIBIT 3 — COMPLAINT PROCEDURES

Any person who believes they have faced unequal treatment or discrimination as to the receipt of benefits and/or services based on their race, color, national origin, sex, age, religion, disability/handicap, or income status has the right to file a written complaint under these procedures. These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and all other pertinent federal non-discrimination directives. They relate to any program or activity administered by the City as well 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. The option of informal mediation meeting(s) between affected parties and the Coordinator may be utilized for resolution.

Procedure

- 1. Any person, group of persons, or entity that believes they have been subjected to discrimination under Title VI of the Civil Rights Act may file a written complaint with the ADA Coordinator. A complaint may also be filed by a representative on behalf of such a person.
- 2. In order to have the complaint considered under this procedure, the complaint must be filed no later than **(180)** calendar days after:
 - The date of the alleged act of discrimination; or
 - Where there has been a continuing course of conduct, the date on which that conduct was discontinued
- 3. Complaints shall be filed using the City's Title VI Complaint Form (available at http://edmondok.com/complaintform, or by contacting the City of Edmond Planning Office). Complaints shall set forth, as fully as possible, the facts and circumstances surrounding the claimed discrimination. In the event that a person makes a verbal complaint of discrimination to an officer or employee of the recipient, the person shall be interviewed by the Coordinator. If necessary, the staff coordinator will assist the person in reducing the complaint to writing and submit the written version of the complaint to the person for signature. The complaint shall then be handled in the usual manner.

Complaints should be directed to:

City of Edmond
Planning Department:
ADA Coordinator
10 S Littler St
Edmond, OK 73034

- 4. Upon receipt of the signed complaint form, the ADA Coordinator will log-in the complaint, determine the basis of the complaint, authority/jurisdiction, and who should conduct the investigation.
- 5. The ADA Coordinator reviews and determines the appropriate action regarding every Title VI complaint. The City will not proceed with or continue a complaint investigation if:
 - a. The complaint is, on its face, without merit
 - b. The same allegations and issues of the complaint have been addressed in a recently closed investigation or by previous federal court decisions.
 - c. The complainant's or injured party's refusal to cooperate (including refusal to give permission to disclose his or her identify) has made it impossible to investigate further.
- 6. The ADA Coordinator will investigate the complaint and log the following information within ten **(10)** calendar days of receipt of the allegation(s):
 - a. Name, address, and phone number of the complainant.
 - b. Email address if available.
 - c. Basis of complaint (i.e., race, color, national origin, sex, age, religion, disability/handicap, income).
 - d. Date of the alleged discriminatory act(s).
 - e. Date of complaint received by the recipient.
 - f. A statement of the complaint.
 - g. Other agencies (state, local or Federal) where the complaint has been filed.
 - h. An explanation of the actions the recipient has taken or proposed to resolve the issue(s) raised in the complaint.
- 7. Within ten **(10)** business days, the ADA Coordinator will acknowledge receipt of the allegation, inform the complainant of action taken or proposed action to be taken to process the allegation(s). The notification letter shall contain(s):
 - a. The basis of the complaint.
 - b. A brief statement of the allegation(s) over which the City has jurisdiction.
 - c. A brief statement of the City's jurisdiction over the recipient to investigate the complaint; and
 - d. An indication of when the parties will be contacted.
- 8. If the complaint is against a contractor or subrecipient(s), the City will have (15) business days from the receipt of the complaint to advise the appropriate state or federal agency (e.g., ODOT for transportation related projects) of the receipt of a complaint, and the status of the investigation.
- 9. The ADA Coordinator will work with appropriate parties to conduct an in-depth, personal interview with the complainant(s). Information gathered in this interview includes: identification of each complainant by race, color, national origin, sex, age, religion, disability/handicap, or income; name of the complainant; a complete statement concerning the nature of the complaint, including names, places, and incidents involved in the complaint; the date the complaint was filed; and any other pertinent information the investigation team feels is relevant to the complaint. The interviews are recorded either on audio tape or by taking notes. Every effort will be made to obtain early resolution of complaints at the lowest possible level.

- 10. Within **(15) business days** of receiving comments from the federal or state agency, the ADA Coordinator will meet with all parties to the complaint to discuss the comments received by the federal or state agency.
- 11. Within sixty **(60) calendar days** from the date the original complaint was received, the ADA Coordinator will coordinate the preparation of a written investigative report. The investigative report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition. The written report shall be reviewed and finalized by the ADA Coordinator and sent to the City Attorney.
- 12. The City Attorney will review the investigative report and meet with the ADA Coordinator and City Manager to determine the appropriate action. Within ninety **(90)** calendar days of receipt of the complaint, the ADA Coordinator will issue a "Letter of Findings" to the complainant.
- 13. If the complaint cannot be resolved by the Department to the satisfaction of all parties concerned, the party not satisfied is advised of his or her right to appeal pursuant to Title 49, Code of Federal Regulations, Part 21. The appeal must be filed, in writing no later than (180) calendar days after the date of the alleged discrimination, unless the time for filing is extended by the Secretary to:

U.S. Department of Transportation
Office of Civil Rights
1200 New Jersey Avenue, SE
8th Floor E81-314
Washington, DC 20590

A complaint may be filed with the Secretary; U.S. Department of Transportation, before, during, or after the complaint has been filed with the City of Edmond.



Title VI Complaint Form

Title VI of the Civil Rights Act of 1964 requires 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 subjected to discrimination under any program or activity receiving federal financial assistance." The City further assures that discrimination does not occur on the basis of gender, age, religion, disability/handicap, or income status as provided by other pertinent non-discrimination directives.

All complaints must be in writing and signed by the complainant or his/her representative before action can be taken. Complaints shall state, as fully as possible, the facts and circumstances surrounding the alleged discrimination. The City of Edmond will provide a written acknowledgment that we have received the complaint within ten working days.

The completed form should be sent to:

ADA Coordinator Planning Department Re: Title VI 10 S Littler, Edmond, OK 73034

405-359-4790

NAME	
NAME	DAY PHONE
MAILING ADDRESS	EVENING PHONE
CITY STATE ZIP CODE	E - MAIL
Person Discriminated Against (If Other Than Complainant)	
	DAYPHONE
	DAY PHONE
Person Discriminated Against (If Other Than Complainant) NAME MAILING ADDRESS	DAY PHONE EVENING PHONE
NAME	
NAME	
MAILING ADDRESS	EVENING PHONE

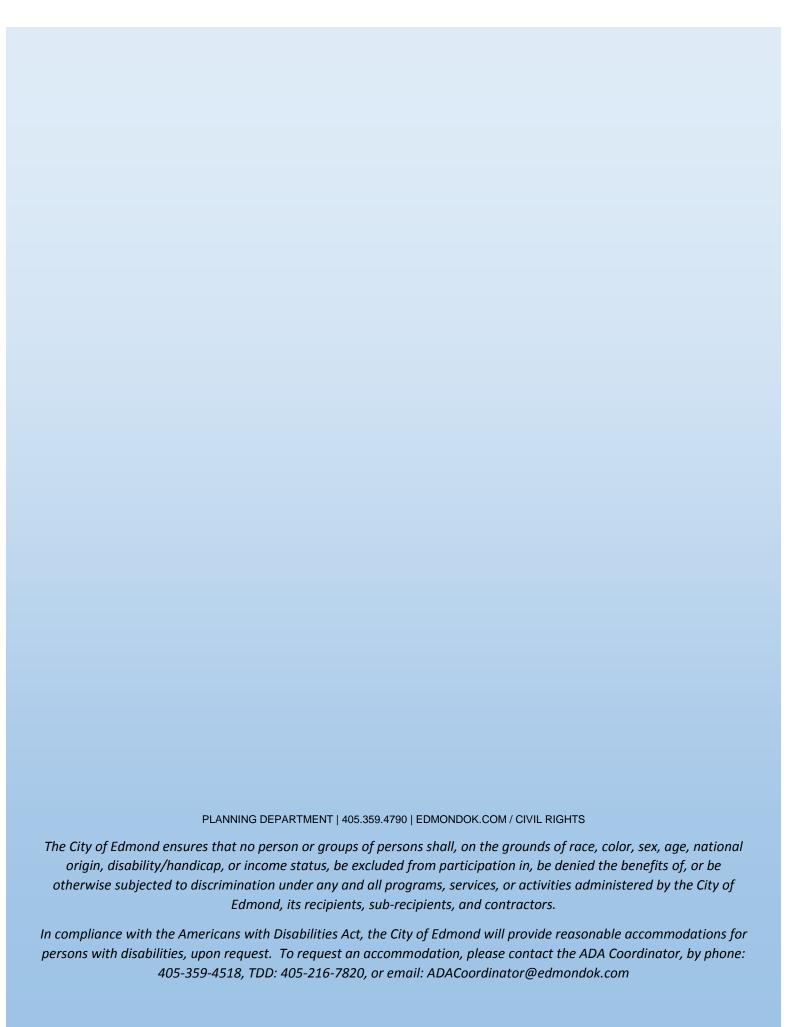
(Continued On Reverse)

Exhibit 4 – TITLE VI COMPLAINT FORM (PAGE 2)

What was the discrimi	nation based on? (Check	k all that apply)	
□Race/Color	□Disability	□Low Income	
☐ National Origin	☐ Gender	□ Ag e	☐ Religion
What City representation person alleging were in the second secon	ent take place? Please	responsible and what h	e discriminated against. Who was
			(Continued On Next Page

Exhibit 4 – TITLE VI COMPLAINT FORM (PAGE 3)

	NAME			DAY PHONE	
	MAILING ADDRESS			EVENING PHONE	
Witness	MAILING ADDRESS			EVENING PHONE	
Š	CITY	STATE	ZIP CODE	E - MAIL	
	NAME			DAY PHONE	
	MAILING ADDRESS			EVENING PHONE	
witness					
\$	CITY	STATE	ZIP CODE	E - MAIL	
lfai □ F	d you file this complaint with anoth nswer is yes, check agency compla ederal Agency	aint was filed with	and provide agen	cy contact information:	
lf a	nswer is yes, check agency compla ederal Agency	aint was filed with	and provide agen	cy contact information: te Court 🔀 Local Agency	
lf a	nswer is yes, check agency compla ederal Agency	aint was filed with	and provide agen	cy contact information: te Court	
f a	nswer is yes, check agency compla ederal Agency	aint was filed with	and provide agen	cy contact information: te Court	
AG	nswer is yes, check agency compla ederal Agency	aint was filed with	and provide agen	cy contact information: te Court	
AG CI	nswer is yes, check agency complained agency of Federal Court of The Sency NAME SENCY MAILING ADDRESS	state Ag	and provide agen gency Sta Date Filed:	cy contact information: te Court	
AG CI	nswer is yes, check agency complainment is yes, check agency complainment in the complainment in the complainment is yes, check agency complainment in the complai	state Ag	and provide agen gency Sta Date Filed:	cy contact information: te Court	
AG AG	nswer is yes, check agency complained agency of Federal Court of The Sency NAME SENCY MAILING ADDRESS	state Ag	and provide agen gency Sta Date Filed:	cy contact information: te Court	
AG AG	nswer is yes, check agency complained agency complained agency agency agency complained agency complained agency agency agency make agency mailing address TY TTORNEY NAME (If you have representation	state Ag	and provide agen gency Sta Date Filed:	cy contact information: te Court	



APPENDIX D

COTPA BOARD OF TRUSTEES APPROVAL OF TITLE VI PROGRAM UPDATE (2019)



RESOLUTION TO APPROVE THE TITLE VI PROGRAM FOR FY 2019-22

WITNESSETH

WHEREAS, Central Oklahoma Transportation and Parking Authority ("COTPA") is the recipient of Federal transit funds; and

WHEREAS, 49 CFR Section 21.9(b) requires COTPA to have a Title VI Program; and

WHEREAS, COTPA is required to submit its updated Title VI Program to the Federal Transit Administration (FTA) every three years; and

WHEREAS, the proposed Title VI program is submitted herein for the Trustees' review and approval.

NOW, THEREFORE, the COTPA Board of Trustees hereby approves the attached Title VI Program for FY 2019-22.

CENTRAL OKLAHOMA TRANSPORTATION AND PARKING AUTHORITY

ATTEST: (Seal)

Secretary

REVIEWED for form and legality.

Chairman

Assistant Municipal Gounselor

APPENDIX E BUS STOP POLICY



> V	All Division	Policy # Revision #	300.1-1
POLICY & PROCEDURE		Implementation Date	1/6/17
Bus Stop Policy	Page 1 of 3	Last Reviewed/Update Date	1/6/17
Owner: Scheduling	Approval: Board of Trustees		1

Purpose:

The purpose of this policy is to provide staff, local jurisdictions and municipalities within the Central Oklahoma Transportation and Parking Authority (COTPA) service area a consistent set of guidelines for designing comfortable and convenient high quality facilities at bus stop locations, while considering the operational needs of the Authority, the requirements of the Americans with Disabilities Act (ADA) and public safety. While the focus of this document is on bus stops, many of the elements addressed here may also apply to other transit modes.

The Central Oklahoma Transportation and Parking Authority (COTPA) has established a bus stop policy to provide guidelines to help balance providing ample, convenient and safe locations for passengers to board and alight buses while spacing bus stops at a distance that allows the bus system to operate in an efficient and reliable manner. Nothing in this policy is intended to suggest that the placement of each bus stop will not be evaluated on an individual basis. Under this policy, buses do not stop at a location that is not designated as a bus stop unless there is a need to serve a person with a disability or address a reasonable accommodation request. Moreover, this policy shall provide quidelines for the level of customer amenities provided at bus stops based on the amount of customer activity. Prior to this policy street furniture, primarily bus benches, has been placed in a manner that is inconsistent with the provisions of this policy. These benches and shelters that do not conform to the new standard have been "grandfathered" into the transit system until upgrades to the stop locations consistent with this policy are made.

Policy Statement:

Bus stops will be spaced far enough apart so that the travel speed of bus routes will support system reliability. Bus stops will be located where passengers can conveniently walk to the stop, but far enough from adjacent stops on the same route so that travel times are consistent with the schedule. Bus stop spacing will also be impacted by topography, limited access areas and surrounding attractors such as popular retailers, medical facilities and transfer points.

> V	All Division	Policy # Revision #	300.1-1
POLICY & PROCEDURE		Implementation Date	1/6/17
Bus Stop Policy	Page 2 of 3	Last Reviewed/Update Date	1/6/17
Owner: Scheduling	Approval: Board of Trustees		1

Safety of passengers and bus operators shall be the number one concern in determining the location of bus stops. Bus stops will be placed primarily on the far side of intersections. Far side stops reduce conflict between right turning vehicles and stopped buses and encourage pedestrians to cross the street at the rear of the bus. Bus stop locations will be chosen such that, to the maximum extent practical, they will comply with ADA guidelines. Stops at the near side of intersections will be used only when a far side stop is deemed unsafe or not practical. Stops in the middle of the block will be considered in some cases. Each location where a bus will stop for a passenger boarding or alighting will be clearly identified with a bus stop sign.

This policy will be implemented in a manner consistent with Title VI to ensure the addition of shelters and benches within the EMBARK system does not create a disparate impact or disproportionate burden.

Procedures or Definitions:

To promote a structured and consistent approach to placement of bus stops and amenities at bus stops, staff will follow the guidelines below. The guidelines have been developed to ensure the safety of operators, customers and pedestrians, while supporting on-time performance of the bus system and further customer satisfaction.

Bus Stop Placement

- Points of interest
 - Retail development
 - Hotel
 - School
 - University
 - Social service agency
 - Medical facility
 - Public buildings
 - Multifamily housing
- Locations with ADA or senior customers in a concentrated area
- Places where customers can transfer to other routes or modes.
- Facilities that generate large amounts of pedestrian traffic

> V	All Division	Policy # Revision #	300.1-1
POLICY & PROCEDURE		Implementation Date	1/6/17
Bus Stop Policy	Page 3 of 3	Last Reviewed/Update Date	1/6/17
Owner: Scheduling	Approval: Board of Trustees		'

- Park-and-Ride facilities
- Transit oriented development
- Locations with physical barriers such as high curbs, drainage structures and steep grades will be omitted from bus stop placement consideration

Bus Stop Sign Placement

 Bus stop signs will be placed at all bus stops. The signage suite will consist of an EMBARK bus stop identifier, route information sign, unique stop ID sign and customer information panel.

Bus Bench Placement

- Bus stops that average multiple boardings during the day
- Bench placement location must meet ADA requirements

Bus Shelter Placement

- Bus stops that average at least ten (10) boardings during the day
- Shelter will include bench, trash receptacle and security lighting
- Shelter and placement must be constructed to meet ADA requirements

Shopping Cart Corrals

• Placed at shelter locations abutting grocery stores and shopping centers that average at least twenty (20) boardings during the day

Electronic Bus Arrival Signage

- Placed at shelter locations where boardings average 100 during the day
- Can only be placed when access to electricity is readily accessible

Trash Receptacles

- Placed at all shelter locations
- Placed at bench locations at the discretion of staff based on boardings and density of transit stops

APPENDIX F

EMBARK 2017 ON-BOARD SURVEY



EMBARK On-Board Transit Survey

...helping organizations make better decisions since 1982

Draft Report

Submitted to EMBARK:

ETC Institute 725 W. Frontier Lane, Olathe, Kansas 66061

January 2018





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2017 EMBARK Onboard Survey Executive Summary Report

Overview and Methodology

EMBARK initiated this survey during the fall of 2017. The primary objective for conducting the On-Board Transit Survey was to gather accurate travel data from transit riders.

The universe for the survey consisted of fixed routes in the EMBARK system. The contract for the project was to obtain at least 1,000 completed surveys. The actual number of completed surveys was 1,757, a total of 1,318 surveys were completed during the week, a total of 439 surveys were completed during the weekend.

This overview contains a description of the data requirements, sampling methodology including the sampling plan, survey administration/quality control procedures, and data entry/editing procedures. More detailed information is provided in subsequent sections of this report:

- A detailed description of the administration of the on-board survey and characteristics
 of transit riders and select findings are provided is provided in this Executive
 Summary.
- Charts and graphs from the survey in Section 1.
- Importance satisfaction analysis of key service characteristics in Section 2.
- Frequency distribution tables for weekday survey results are provided in Section 3.
- Copies of the survey instrument in both English and Spanish are provided in Section 4.

Data Requirements

ETC Institute worked closely with staff from EMBARK to design the survey instrument. Some of the specific types of information that were gathered on the survey included:

- Frequency of usage
- Purpose of trip
- Payment method
- Transit access mode
- Transfers
- Assessment of transit facilities
- Customer satisfaction and importance ratings
- Accessing EMBARK information
- Household information (income, vehicles, etc.)
- Personal information (gender, employment, etc.)



Sampling Methodology

ETC Institute developed a sampling plan to ensure that the overall results of the survey would be statistically valid for the region. The sampling plan identified the number of completed surveys that were needed from each route.

The sampling plan was designed to ensure that the overall results of the on-board survey would have a precision of at least +/-2.5% at the 95% level of confidence. Although the scope of work only required the completion of 1,000 surveys, our team agreed to collect more than 1,000 surveys to ensure that results would be statistically representative of the system.

EMBARK On-Board Survey

Sampling Goal: Goal vs. Actual Completes

Route Name	Goal	Actual	Difference	Notes
COTPA ROUTES				
002 - COLTRANE	68	84	16	Goal Exceeded
003 - N KELLY	41	54	13	Goal Exceeded
005 - MEMORIAL RD	106	102	-4	Goal Exceeded
007 - N MAY	56	78	22	Goal Exceeded
008 - N PENN/NW 63RD	68	63	-5	Multiple attempts made – lower ridership
009 - W RENO CROSSTOWN	40	61	21	Goal Exceeded
010 - N PORTLAND	31	49	18	Goal Exceeded
011 - 29TH ST CROSSTOWN	58	56	-2	Multiple attempts made – lower ridership
012 - S MAY	56	58	2	Goal Exceeded
013 - S WESTERN/I-240 CROSSTOWN	56	69	13	Goal Exceeded
014 - SE BRYANT or SUNNYLANE	40	41	1	Goal Exceeded
015 - MIDWEST CITY	23	46	23	Goal Exceeded
016 - S PENN	42	36	-6	Multiple attempts made – lower ridership
018 - LINCOLN	21	39	18	Goal Exceeded
019 - SPENCER	7	23	16	Goal Exceeded
022 - MARTIN LUTHER KING	42	56	14	Goal Exceeded
023 - 23RD ST CROSSTOWN	103	147	44	Goal Exceeded
024 - NORMAN	3	15	12	Goal Exceeded
038 - 10TH ST CROSSTOWN	78	101	23	Goal Exceeded
040 - S WALKER	43	64	21	Goal Exceeded
050 - DOWNTOWN DISCOVERY	20	28	8	Goal Exceeded

Survey Administration/Quality Control Procedures

Some of the survey administration and quality control procedures utilized by ETC Institute are listed below.

- Each interviewer was trained to understand the purpose of the survey so they could explain the importance of the survey to riders.
- One interviewer was assigned per bus and at least one bus was selected from each route.



- Interviewers conducted surveys on their assigned bus for the entire day that the route was in operation in accordance with the hours shown in the sampling plan. Short breaks were allowed for interviewers in conjunction with breaks that were taken by the driver.
- The interviewer attempted to ask every rider who boarded the bus to complete the survey.
- The interviewer checked the survey to ensure that the "critical questions" were complete.
- Following the completion of each run along a route, the interviewer would briefly get
 off the bus and take completed surveys from that route to ETC Institute's Team
 Leader. The Team Leader worked at the "center of operations" designated in the
 sampling plan.
- ETC Institute's Team Leader and assistant reviewed all the completed surveys that
 were submitted by interviewers to ensure the usability, accuracy, and completeness of
 the data collected.

Data Entry and Editing Procedures

Following the administration of the survey, ETC Institute's Team Leader and the interviewing team conducted a secondary review of the completed surveys. Errors that were identified during the secondary review were corrected when possible. When data was missing, incomplete, or illegible, internet research was conducted to retrieve the data. Specific procedures that were followed by ETC Institute are described below:

- ETC Institute personnel conducted a 100% review of all completed surveys.
- ETC Institute personnel conducted dual data entry for 100% of the records. All
 completed surveys were entered into two independent databases by different people.
 After data entry was completed for each database, the files were compared and
 screened for records that did not match. Records that did not match were corrected in
 each of the databases by different people. The files were then merged again, and
 records that still did not match were corrected again. This process was repeated until
 all records in each of the two databases matched.

Administration of the Survey

Conduct the Pretest

ETC Institute conducted a pre-test with 25 riders on 2 different routes. The pre-test was designed to ensure the survey worked properly and the process covered all aspects of the survey administration procedures including:

- placing surveyors on the transit vehicles at the designated time
- assessing the completeness of surveys by checking the "critical questions" for completeness



 briefly exiting the bus after each route to give completed surveys to ETC Institute's Team Leader

No problems with the survey instrument were found from the pilot test. Based upon these findings, the survey administration procedures and survey instrument were finalized. Copies of the survey instruments in English and Spanish are provided in chapter 7 of this report.

Administer the On-Board Passenger Survey

ETC Institute fielded a survey administration team on weekdays during the month of October. The surveys were administered in accordance with the procedures that were previously described. A total of 1,318 useable weekday surveys were obtained, which was 318 more than the goal.

Alternative Methods of Completing the Survey

Although most surveys were completed by riders during their trip, riders who did not have time to complete a survey were given a survey and a postage-paid return-reply envelope to return to ETC Institute by mail after it had been completed, respondents also had the option of returning completed surveys to EMBARK Transit Centers.

Characteristics of Transit Riders and Select Findings

Rider Profile

Various demographic and profile information for respondents is presented in this section. The data is representative of the 1,318 respondents who were surveyed during the weekday.

Vehicles in Household

Sixty-seven percent (67%) of EMBARK users have no working vehicle in the household. This is consistent with the results found in 2016 and 2015, in which 68% and 70% of respondents respectively, did not have a working vehicle. Only 19% of respondents have one working vehicle, 21% of respondents in 2016 indicated they had one working vehicle. Thirteen percent (13%) of respondents have two or more vehicles available to their household.

Household Size

One-third (33%) of respondents indicated they lived in a one-person household, 27% indicated they lived in a two-person household, 34% indicated their household size is between three and five, while only 7% of respondents indicated they lived in a household with 6 or more people. These results were consistent with previous years.

Ethnicity/Race

Forty-two percent (42%) of respondents indicated they were Black/African American, while 37% indicated they were White/Caucasian, 11% of respondents indicated they were Hispanic, Latino, or of Spanish origin, and 13% indicated they were Native American. These results were consistent with previous years



Employment Status

Thirty-five percent (35%) of respondents indicated they were employed full time, down 4% from 2016 and up 5% from 2015. Sixteen percent (16%) of respondents indicated they were employed part time, this number is consistent with 2016, and 4% lower than 2015.

Income

Fifty-four percent (54%) of respondents indicated they had annual household incomes of less than \$10,000 in 2017, this is an increase of 14% from 2016. Twenty-four percent (24%) indicated they had incomes between \$10-\$19,999, an increase of 5% from 2016. Seventy-eight percent (78%) of respondents reported an annual income of \$19,999 or less, this is a significant increase of 19%.

Internet Use

Seventy-one percent (71%) of respondents indicated they currently access the internet using a phone, this is a 6% increase from 2015, and the same as 2016. Twenty-nine percent (25%) of respondents indicated they currently access the internet via the computer, this is a 4% decrease from 2016. There was a 2% increase in the number of respondents who currently do not have access to the internet from 14% in 2016 to 16% in 2017.

Use of Trip Planning Tools

The most used trip planning tool is 235-RIDE saw a 18% decline in the number of respondents indicated they have used the 235-RIDE service in 2016. Thirty-four percent (34%) of respondents indicated they used embarkok.com, 12% used the EMBARK connect app, 7% used an online planner, and 9% use text alerts.

Primary Reasons Respondent's Use Transit

Nearly two-thirds (63%) of respondents indicated they had no car available which is the reason they were using transit. A quarter (25%) of respondents selected they could not drive as the reason for using transit, 13% indicated they wanted to save money, 6% were avoiding driving or traffic, 2% wanted to avoid parking, and 4% indicated they were using EMBARK because it was good for the environment.

Purpose of Trip

Forty-four percent (44%) of respondents specified the purpose of their trip was for work. Seventeen percent (17%) indicated their trip was for shopping or errands. Other purposes included: Medical (12%), entertainment/social (7%), social service (4%), School (K-12) (3%), and School (Tech, College, University) (4%).

Fare Type

One third (33%) of respondents used a Day Pass as their method of fare payment. There has been consistent decrease in 30-Day Pass users: 20% reported in 2017, 21% in 2016, 25% in 2015, and 41% in 2011. The other three major fare types remained consistent Cash (25%), 7-Day Pass (13%), and Value Card (2%).



Frequency of Use

Frequency of use between 2017, 2016, and 2015 remained consistent in all categories. Fifty percent (50%) of respondents indicated they ride 5+ days per week, this compares to 54% in 2016 and 52% in 2015. Nearly a quarter of respondents (22%) indicated they ride 3-4 days per week, this is the same as 2016 and 2015. The remaining respondents indicated 1 or 2 days per week (12%), 1-3 days a month (9%), and less than once a month (7%).

How Long Respondent has been Riding Transit in OKC Area

Half of all weekday respondents, 50%, indicated they have been riding for more than 2 years. Nineteen percent (22%) of respondents indicated they have been riding 6 months or less, whereas 11% indicated they have been riding 6 months to a year. Lastly, sixteen percent (16%) of respondents indicated they've been riding for 1 to 2 years.

Transfers

The number of respondents who indicated they did not have to make any transfers in order to reach their destination has increased two percent from 29% in 2016 to 31% in 2017. There was not an increase in the number of respondents who indicated they took one or two transfers to reach their destination. Most notably, there was a 2% decrease in the number of respondents who indicated they take three or more transfers to reach their destination.

Service Ratings and Importance

Respondents were asked to provide an overall rating of the services EMBARK provides using a five-point scale from Excellent to Poor. Regarding the overall rating of EMBARK services, 74% of respondents rated the service as Excellent (27%) or Good (47%), only 3% of respondents indicated the service was Poor. There was a slight increase in both "excellent" and "good" responses from 2016 to 2017.

The following three aspects of EMBARK Service received the highest positive ratings (Excellent or Good) in 2017 among weekday riders.

- Safe operation of bus (78%)
- Ease of paying fare (77%)
- Cleanliness of transit center (76%)

The three most important aspects of EMBARK Service for weekday riders are:

- Buses arriving on time (31%)
- Availability of accessible bus stops (22%)
- Courtesy of drivers (19%)

Investment Priorities

Recommended Priorities for the Next Two Years. In order to help the agency identify investment priorities for the next two years, ETC Institute conducted an Importance-Satisfaction (I-S) analysis. This analysis examined the importance respondents placed on each



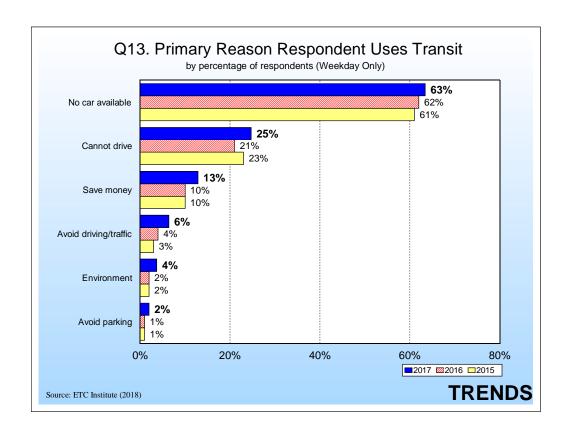
service and the level of satisfaction with each service. By identifying services of high importance and low satisfaction, the analysis identified which services will have the most impact on overall satisfaction with agency services over the next two years. If EMBARK wants to improve its overall satisfaction rating, they should prioritize investments in services with the highest Importance Satisfaction (I-S) ratings. Details regarding the methodology for the analysis are provided in Section 2 of this report.

Overall Priorities for EMBARK by Major Category. This analysis reviewed the importance of and satisfaction with major categories of agency services. This analysis was conducted to help set overall priorities. Based on the results of this analysis, the major services that are recommended as the top priorities for investment over the next two years in order to raise the overall satisfaction rating are listed below:

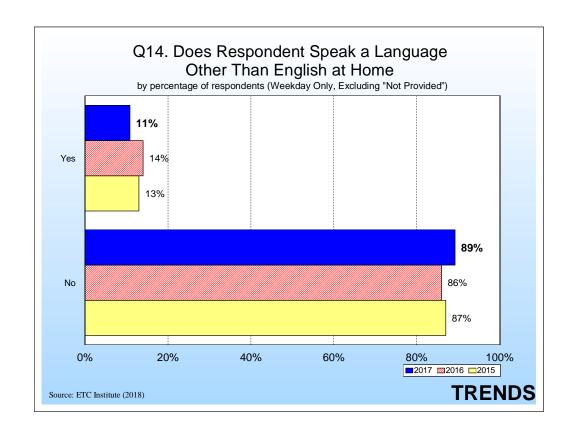
Buses arriving on time (IS Rating=0. 1165)

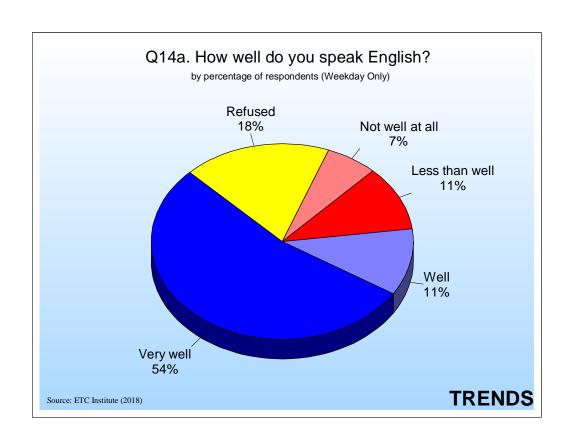
The table below shows the importance-satisfaction rating for all 15 major categories of agency services that were rated.

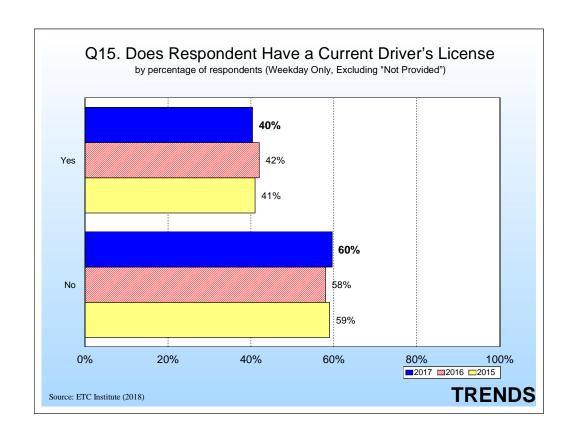
2017 Importance-Satisfaction Rating							
EMBARK Onboard Survey - Weekday Riders Major Categories of Service							
	Most	Most			Importance-		
	Important	Important	Satisfaction	Satisfaction	Satisfaction	I-S Rating	
Category of Service	%	Rank	%	Rank	Rating	Rank	
High Brigains (IS 40, 20)							
High Priority (IS .1020)	040/	_	000/	45	0.4405	_	
Buses arriving on time	31%	1	62%	15	0.1165	1	
Medium Priority (IS <.10)							
Availability of accessible bus stops	22%	2	73%	8	0.0604	2	
Frequency of service	17%	4	67%	12	0.0568	3	
Courtesy of drivers	19%	3	72%	9	0.0520	4	
Cleanliness of buses	9%	6	68%	11	0.0278	5	
Cleanliness of bus shelters	8%	9	64%	13	0.0268	6	
Helpfulness of customer service staff	10%	5	75%	5	0.0252	7	
Safety while waiting at a bus stop	8%	8	72%	10	0.0211	8	
Ease of locating a bus stop	7%	10	74%	7	0.0193	9	
Safe operation of bus	8%	7	78%	1	0.0177	10	
Ease of getting service information	6%	11	75%	6	0.0153	11	
Information at the bus stop	4%	14	63%	14	0.0141	12	
Safety at transit center	6%	12	75%	4	0.0139	13	
Ease of paying your fare	5%	13	77%	2	0.0119	14	
Cleanliness of transit center	3%	15	76%	3	0.0072	15	

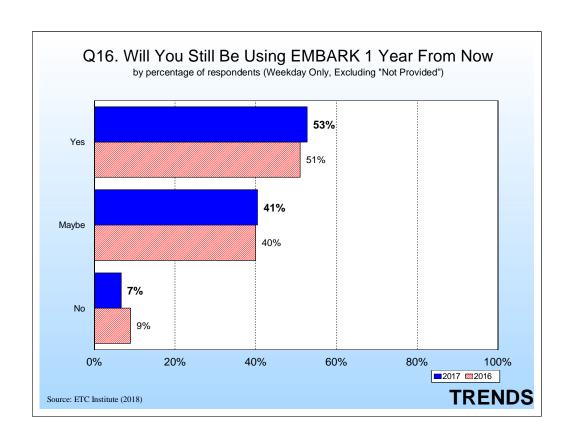


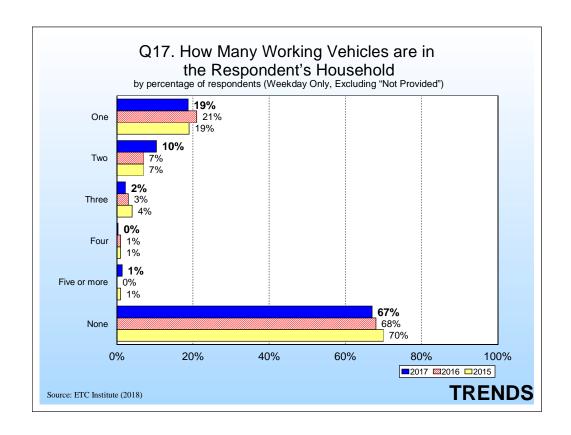
Demographics

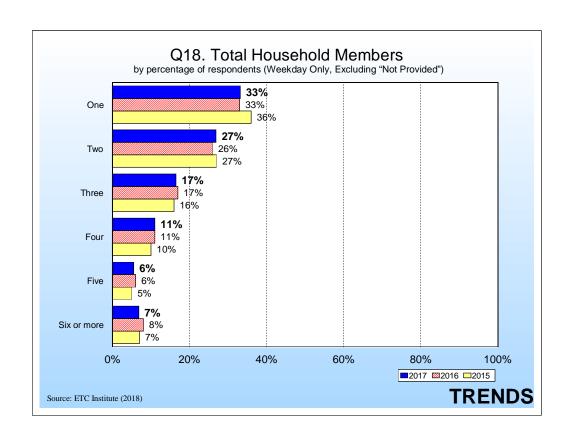


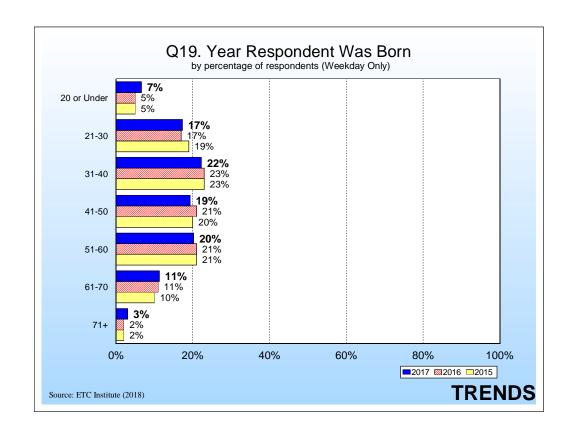


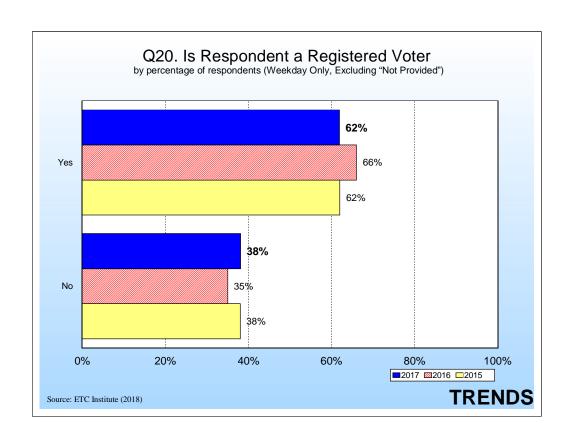


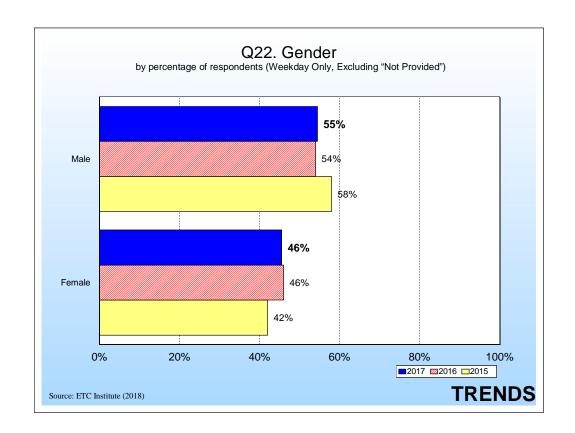


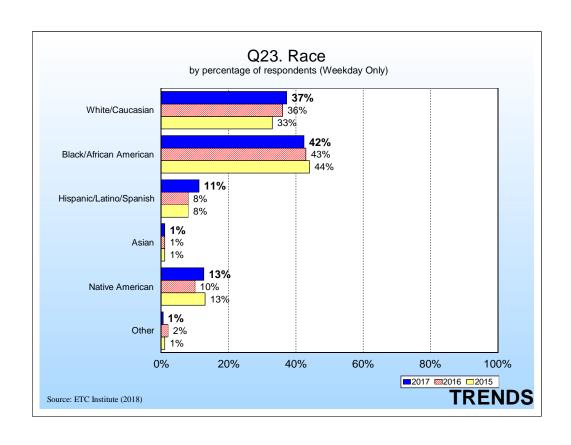


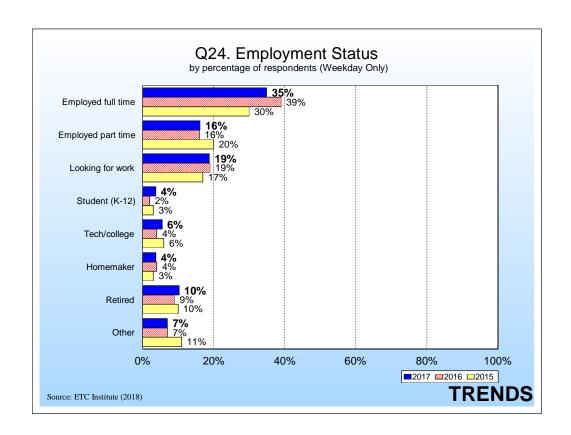


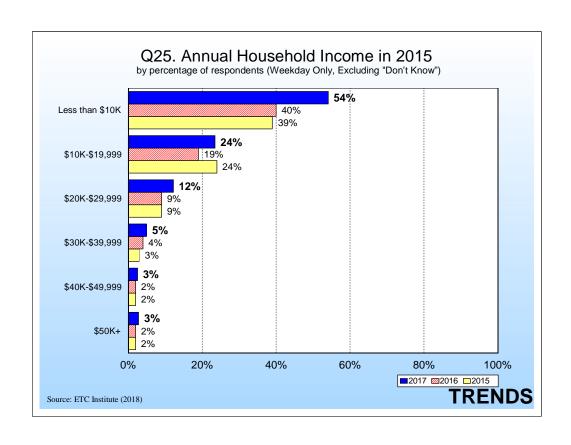


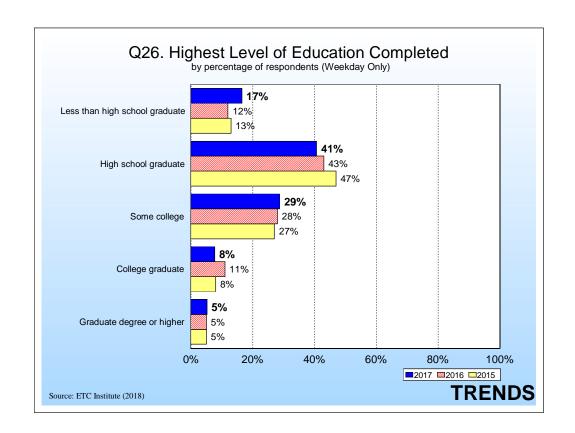


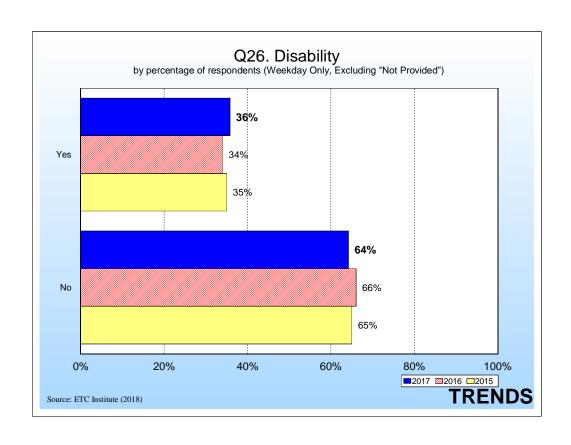












APPENDIX G

SERVICE AND FARE ANALYSIS SINCE LAST TITLE VI SUBMISSION





EMBARK 2018 Fare Change Title VI Fare Equity Review

Delivered on: May 3, 2018

FINAL

Prepared by Four Nines Technologies



In partnership with NWC Partners

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1 Executive Summary

While EMBARK operates fixed route service in an urbanized area (UZA) of 200,000 or more in population, EMBARK operates less than 50 fixed route vehicles in peak service. As such, under the federal Civil Rights Act (Title VI) guidance provided in Circular 4702.1B, EMBARK is only required to set system-wide standards and policies and is not required to complete a fare equity analysis. However, EMBARK is required to comply with the Department of Transportation (DOT) Title VI and Environmental Justice regulations, and therefore, EMBARK must also review its policies and practices to ensure its fare changes do not result in disparate impacts on the basis of race, color, or national origin or create a disproportionate burden for low-income riders.

The following report summarizes the review of the proposed fare change on fare equity. EMBARK recognizes a major service change as any reduction in service hours exceeding five percent (5%) of the current number of daily service hours provided or when fares will increase by more than ten cents (\$0.10) on regular adult fares.

The fare equity review indicates that the fare structure change currently being considered may not result in adverse effects being disproportionately borne by minority or low-income riders for all aspects of the proposed change. However, certain aspects of the proposed changes may result in some groups bearing a disproportionate share of adverse effects.

2 Fare Change Overview

In January 2017, EMBARK initiated a fare study to review EMBARK's fare structure, products, pricing, and fare collection technology. The study also identified changes necessary to accommodate fare collection for the new OKC streetcar anticipated to open in December 2018.

As part of the fare study, a list of goals was established to guide the development of fare recommendations. These goals were adopted by the COTPA Board of Trustees on March 02, 2018 as part of the Fare Change Policy that was developed as part of the fare study.

The goal of the fare policy and fare collection strategy is a fare system that:

- Provides choices for customers that are easy to understand, explain, and use,
- Attracts new customers and additional trips from existing customers,
- Promotes multimodal fare integration and trip making,
- Uses fare collection technology to enhance fare payment options for customers and assist in fare enforcement,
- Is equitable and takes into consideration a customer's ability to pay,
- Achieves fare revenue needs and strives to achieve EMBARK's farebox recovery revenue targets,
- Accommodates accounting and reporting needs, and
- Considers transit industry best practices in fare technology for the different modes while taking into consideration the costs of the technology and approaches used by similar size peers.

During the fare study, several recommendations for fare policy changes were identified based on a review of EMBARK's fare system and using these goals.

This fare equity reviews evaluates the impacts of the following proposed fare policy changes that resulted from this study:

 Rebranding of the Unlimited Pass as Universal Pass to be accepted on all fixed route services, including all fixed route bus and streetcar services

- Fare Increase on Downtown Discovery; establishment of Circulator fares and passes in preparation of the introduction of a streetcar; and introduction of a Circulator 30-Day Pass
- Introduction of an Annual Circulator Pass and an Annual Universal Pass
- Increase in the senior age threshold from 60 to 65
- Elimination of change cards on fixed route
- Implementation of off-board fare payment for streetcar
- Introduction of mobile ticketing for fare payment

Table 1 illustrates the proposed fare products and pricing. The only changes to the proposed fare products and pricing include:

- Rebranding of the Unlimited Pass as Universal Pass and acceptance of the pass in the future on streetcar services in addition to fixed route
- Rebranding the Downtown Discovery 1-Day Pass as a Circulator 1-Day Pass for acceptance on Downtown Discovery and Streetcar as well as any future Circulator services
- Fare increase of Circulator Single Trip fare from \$0.50 to \$1.00 and 1-Day Pass from \$1.00 to \$3.00 for Adult riders (Reduced fares would still be offered with a 50% discount)
- Introduction of a Circulator 30-Day Pass priced at 32 times the Single Trip fare
- Introduction of an Annual Circulator Pass and an Annual Universal Pass priced at (12) 30-day passes

There are no proposed changes to the price of Local or Express bus fares or Universal Passes.

Table 1: Proposed Fare Products and Pricing

	Proposed Pricing		
	Adult	Reduced	Validity
Local & Express Fares			
Local Single Trip	\$1.75	\$0.75	Single boarding
Express Single Trip	\$3.00	\$1.50	Single boarding
Circulator Fares			
Downtown Discovery Single Trip	\$1.00	\$0.50	Single boarding
Streetcar 1-Hour Pass	\$1.00	\$0.50	hour from purchase from ticket vending machine hour from activation through mobile ticketing
Circulator Passes			Valid on Downtown Discovery & streetcar services
1-Day Pass/ Special Event Pass	\$3.00	\$1.50	Bus: 24 hours from activation at farebox Streetcar: 24 hours from purchase from ticket vending machine (or activation of magnetic stripe media on bus) Mobile: 24 hours from activation through mobile ticketing
30-Day Pass	\$32.00	\$16.00	Bus: 30 days from activation at farebox Streetcar: 30 days from purchase from Transit Center (or activation of magnetic stripe media on bus) Mobile: 30 days from activation through mobile ticketing
Annual Pass	\$384.00	\$192.00	Paper: 1 year from purchase Mobile: 1 year from activation through mobile ticketing
Universal Passes			Valid on all fixed route bus and streetcar services
1-Day Pass	\$4.00	\$2.00	24 hours from activation at farebox or through mobile ticketing
7-Day Pass	\$14.00	\$7.00	7 consecutive calendar days from activation at farebox or through mobile ticketing

	Proposed Pricing		
	Adult	Reduced	Validity
30-Day Pass	\$50.00	\$25.00	30 consecutive calendar days from activation at farebox or through mobile ticketing
Annual Pass	\$600.00	\$300.00	Paper: 1 year from purchase Mobile: 1 year from activation through mobile ticketing

These changes were presented to the public during the month of March 2018 at a series of five public meetings in addition to a formal public hearing on April 6, 2018 in presence of the COTPA Board of Trustees. Based on input gathered at the meetings and public hearing, there are no changes to the proposed recommendations. If accepted by the COTPA Board of Trustees, implementation of the proposed changes will occur on July 29, 2018.

2.1 Potential Adverse Effects

Typically, adverse effects associated with a fare change relate to the cost increase of a transit trip, fare or fare media. However, because EMBARK will also be introducing new fare payment methods using mobile ticketing, adverse effects may also relate to access for adding value, lack of online access, or not having a credit or debit card necessary to take advantage of all the benefits of the mobile ticketing app.

As such, adverse effects of this fare change proposal could include:

- Increased costs of per trip transit fares for Downtown Discovery riders
- Reduction in discounts for individuals 60-64, resulting in higher per trip fares for all fixed route bus riders
- Elimination of change cards that result in overpayment for riders without exact cash
- Inability to load value to mobile ticketing for cash riders without necessary credit or debit card

3 Title VI Requirements

Title VI of the Civil Rights Act of 1964, Section 601 states:

"No persons 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 subjected to discrimination under any program or activity receiving federal financial assistance."

It is EMBARK's objective to avoid, minimize or mitigate disproportionately high and adverse impacts on minority and low-income populations. As a recipient of financial assistance from the Federal Transit Administration (FTA) operating more than 50 vehicles, EMBARK will be required to comply with Title VI of the Civil Rights Act of 1964 when evaluating service and fare changes at the planning and programming stages to determine whether those changes have discriminatory impacts, including Disparate Impacts on minority populations and/or Disproportionate Burdens on low-income populations. According to the Federal Department of Transportation, equity in the provision of transit service is described as "providing equal levels of service to minority and non-minority residents of the urbanized area. Levels of service, in turn, are defined in terms of capital allocation and accessibility." Despite being an FTA requirement, a Title VI Equity Analysis should not replace good program planning, which should be an ongoing process that considers equity among other factors when designing fare changes, service changes, or discretionary policies and programs.

4 EMBARK Title VI Policies

In 2012, FTA issued guidance under FTA Circular 4702.1B (Title VI Requirements and Guidelines for Federal Transit Administration Recipients), and Circular 4703.1 (Environmental Justice Policy Guidance for Federal Transit Administration Recipients) requiring large transit agencies to develop policies when they contemplate either service or fare changes.

While EMBARK operates fixed route service in an urbanized area (UZA) of 200,000 or more in population, EMBARK operates fewer than 50 fixed route vehicles in peak service. As such, under FTA Circular 4702.1B, EMBARK is required to only to set system-wide standards and policies and is not required to complete a fare equity analysis for major fare changes. However, EMBARK is required to comply with Title VI and Environmental Justice regulations, and therefore, EMBARK must also review its policies and practices to ensure its fare changes do not result in adverse effects being shouldered disproportionately by one group over another.

As such, while EMBARK is not required to conduct a fare equity analysis, it should conduct a review of the impacts of major fare changes on minority and low-income populations to identify potential adverse impacts on these populations. This review of adverse effects that may be experienced by minority and low-income populations would provide support for a finding of either Disparate Impact or Disproportionate Burden once policies are in place to undertake the analysis.

Per the April 26, 1996 COTPA Board of Trustees policy, EMBARK recognizes a major service change as any reduction in service hours exceeding five percent (5%) of the current number of daily service hours provided or when fares will increase by more than ten cents (\$0.10) on regular adult fares.

Public participation and obtaining public feedback on the proposed fare changes is of the utmost importance to EMBARK. In accordance with its Title VI Program, prior to the institution of a proposed fare increase, EMBARK must publish a notice of a public hearing with a description of the proposed fare changes at least 14 days prior to the public hearing. Additional outreach is conducted as deemed appropriate by EMBARK staff. In addition to the public hearing and other public meetings/outreach, EMBARK also accepts written comments by email and mail.

In the future, when EMBARK operates 50 or more fixed route vehicles in peak service, the COTPA Board of Trustees will need to establish Disparate Impact and Disproportionate Burden Policies along with revision of the Major Service Change Policy for the evaluation of service and fare changes. These policies would establish a statistical threshold to determine whether minority and low-income riders would be disproportionately impacted by a service or fare change, along with the methodology and procedures used to conduct a Service and Fare Equity Analysis. Using these thresholds, EMBARK could conduct a fare equity analysis that evaluates specific elements of the proposed fare structure to determine whether the changes would result in adverse impacts that exceed the threshold established by the EMBARK policies, as outlined in Appendix K of the federal circular, C4702.1B. For fare changes, adverse effects could include an increase in cost, a reduction of discount given, or a reduction in accessibility of fare media.

Absent these EMBARK policies, a review of the fare policies and associated changes can be undertaken to determine whether minority and low-income riders would shoulder a greater proportion of the adverse effects than non-minority and non low-income riders. However, the designation of whether the change would result in a Disparate Impact on minority riders or a Disproportionate Burden on low-income riders would depend upon the threshold that is established in the future EMBARK policies. As such, the review within this report identifies proportionality of adverse effects but does not make a determination of either a Disparate Impact of Disproportionate Burden.

5 Fare Study Community Outreach

In accordance with EMBARK's Title VI Program, outreach related to the fare study was conducted throughout the study process and included public surveys, focus groups, and public meetings. An online public and passenger intercept survey along with public meetings conducted in April 2017 provided information on strengths and weaknesses of EMBARK's current fare structure, as well as input to help identify opportunities, objectives, and potential fare structure and product changes. In October 2017, a focus group was conducted to obtain additional feedback on the implementation of fares on streetcar. In March 2018, a series of five public meetings and a formal public hearing was conducted to obtain feedback on specific fare study recommendations. Written comments were also accepted by email and mail.

In addition to engaging the public, presentations were made to the COTPA Board of Trustees with a series of Board updates at the August 2017 and December 2017 meetings, Board adoption of the Fare Change Policy on March 2018, and public hearing in front of the Board of Trustees at the April 2018 meeting.

5.1 Public, Community and Advisory Outreach Efforts

EMBARK conducted five public meetings and a formal public hearing to present and obtain feedback on the proposed fare policy changes based on the fare study recommendations. Meeting locations were selected to ensure accessibility throughout the EMBARK service area. Public meeting notifications were posted across multiple media platforms, in English, Spanish and Vietnamese.

The public was notified by newspaper, rider alerts, on board notices, and social media channels (embarkok.com, Twitter, and Facebook). The Public Engagement Summary Report in Appendix B contains copies of meeting notices and publications which included:

- Advertisements in the Journal Record, Black Chronicle, and El Nacional de Oklahoma news print
- Emails sent to existing ADA customers
- Social Media notifications via Twitter and Facebook
- Notices via embarkok.com

Five community meetings were held. The times, locations and attendance for each community meeting is as follows:

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Thurs, March 8, 2018 | Noon – 1 pm | Almonte Library | 1 attendee Sat, March 10, 2018 | 9:30 – 10:30 am | Transit Center | 16 attendees Mon, March 12, 2018 | Noon – 1 pm | Ralph Ellison Library | 3 attendees Wed, March 14, 2018 | 5:30 – 6:30 pm | Capitol Hill Library | 4 attendees Tue, March 19, 2018 | 5:30 – 6:30 pm | Warr Acres Library | 4 attendees
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The format for each community meeting was intended to be identical. It was planned that staff would give a brief presentation followed by a question and answer session.

A public hearing was held as part of the monthly COTPA Board Meeting. The format of the hearing was intended to be like the community meetings. Staff gave a brief presentation, provided an update on the five community meetings previously held, and concluded with an opportunity for the Board to hear comments and feedback regarding the proposed changes.

Fri, April 6, 2018 | 9:00 – 10:00 am | Oklahoma City Council Chamber | 3 attendees

The public hearing was also broadcasted on Oklahoma City's local TV channel.

At the public meetings and public hearing, EMBARK presented the proposed fare changes for implementation on July 29, 2018. At each session, sign-in sheets, handouts, and maps were made available. Meeting materials are provided in Public Engagement Summary Report in Appendix B.

5.2 Community Meeting Comments

Participants were encouraged to provide oral comments as well as to fill out comment cards. In addition to at the meetings, written comments were also accepted by email and mail prior to the public hearing. In total, 31 people from the public attended at the public meetings or public hearing. During the process, questions and comments were received. Since the meetings covered both the proposed fare changes and service changes, comments included both fare related and non-fare related questions and comments. Fare related comments from the public meetings, public hearing, and written comments include:

- Attendees generally understood the need for the proposed fare changes and stated that they
 were reasonable.
- Attendees were interested in the Universal Passes and wanted to know whether the passes would be accepted on all services, whether the price of the Unlimited Pass was going to change, and whether Reduced Fare passes would be available. EMBARK will continued to accept Universal Passes on all bus services as well as on streetcar in the future. No price increases for these passes are proposed as part of this fare change and Reduced Fare pass will still be available at a 50% discount. One attendee wanted to know how the price of the passes were set. Passes are priced such that rider must make a minimum number of trips to breakeven.
- Generally, attendees did not have any questions related to the new Circulator fare. One
 attendee asked why the fare for the Downtown Discovery and the future streetcar would be
 lower than the other fixed route fares. The Circulator fares are lower than the other fixed route
 fares since the service is used for circulation downtown and an as such the trips are generally
 shorter.
- Not all riders were familiar with how change cards worked as they currently do not use them. While generally attendees like the benefit of the change cards, they understood why EMBARK would want to eliminate them. Attendees agreed that eliminating change cards would speed up boarding and reduce service delays due to issues with the farebox caused by issuing change cards. Attendees stressed the importance of on-time performance. One attendee noted that they are concerned about having the correct fare; one attendee was interested in a change machine at the transit center; and one attendee noted concern of having the fare ready in advance of boarding due to safety concerns.
- While one attendee noted that they liked the idea of an annual pass, they said they were
 unlikely to use it. Another attendee was concerned about what would happen if the annual pass
 were lost.
- An attendee asked if Medicare cards would still be accepted for a rider to receive a Reduced Fare. EMBARK will continue to accept Medicare cards as proof of eligibility to obtain an EMBARK Reduced Fare ID Card as Medicare cards are issued to individuals ages 65+ and individuals with a disability.
- Attendees were generally interested and excited about mobile ticketing. Attendees wanted to
 confirm that passes for bus will be available through mobile ticketing. One attendee was
 interested in using the mobile ticketing for Spokie Bikeshare rentals (not currently planned).

 At one meeting, attendees were interested in whether there were any proposed changes to EMBARK Plus fares. There are no proposed changes to the EMBARK Plus fares as part of this fare change and Universal Passes will not be accepted on EMBARK Plus.

A complete summary of the results of the comments received during the fare study public meetings and public hearing are provided in Appendix B.

6 Fare Equity Review Methodology Overview

For the fare equity review, EMBARK evaluated the impact of the proposed recommendations on minority and low-income populations. The typical measure of disparate impact or disproportionate burden involves a comparison between the proportion of persons in the protected class (i.e. minority or low-income populations) who are adversely affected by the service or fare change and the proportion of persons not in the protected class (i.e., non-minority or non low-income) who are adversely affected.

Based on the Federal Guidance, the transit provider shall—

- i) Determine the number and percent of users of each fare media being changed;
- ii) Review fares before the change and after the change;
- iii) Compare the differences for each particular fare media between minority users and overall users: and
- iv) Compare the differences for each particular fare media between low-income users and overall users.

6.1 Data Set and Use

For purposes of examining the fare payment behavior, the fare equity review used 2017 On-Board Transit Survey data as well as the 2016 Downtown Commuter Survey and 2012-2016 American Community Survey.

2017 On-Board Transit Survey

The 2017 On-Board Transit Survey data was used to evaluate the fare payment methods and demographics of existing ridership by mode.

Each year, EMBARK conducts an on-board rider survey of its fixed route bus services. The primary objective for conducting the on-board transit surveys is to gather accurate travel data from transit riders. As part of the survey, EMBARK gathers information on customer satisfaction and additional information to support service planning and help in understanding the demographic of riders and how they pay their fares. In fall 2017, EMBARK completed its most recent 2017 On-Board Transit Survey. Given the low ridership on the Route 50 (Downtown Discovery), the route was oversampled to provide better ridership data to support this fare equity review. A total of 1,757 surveys were collected.

2016 Downtown Commuter Survey

The 2016 Downtown Commuter Survey was used to better understand the demographics of downtown Oklahoma City employees who may use other modes besides transit for commuting purposes.

In the fall of 2016, EMBARK conducted a downtown Oklahoma City employee and resident satisfaction survey. It also gathered demographics and information about commuting behavior, including mode, origin and destination. The survey was administered to a random sample of respondents. It obtained 645 responses from employees working in downtown Oklahoma City of which 34 were residents and employees. The survey also captured an additional 33 responses from residents in downtown Oklahoma City who are not downtown Oklahoma City employees.

2012-2016 American Community Survey 5-Year Estimates

The 2012-2016 American Community Survey (ACS) 5-year data was used to better understand the demographics of downtown Oklahoma City residents as well as the greater Oklahoma City region who may drive to downtown Oklahoma City and use Circulator and Streetcar services in the future. Block groups within a quarter-mile of the current Downtown Discovery (Route 50) and the future Streetcar route were used to analyze the demographics of downtown Oklahoma City residents. The Oklahoma City, OK Metro Area was used to analyze the demographics of potential tourists visiting downtown Oklahoma City.

6.2 Overview of the Methodology

A review of each proposed fare policy change was conducted to determine whether the change would result in low-income or minority riders bearing a greater proportion of the adverse effects. If no adverse effects were identified--such as no change in price, discount or access--it was determined that the change would not result in a disproportionality of adverse effects. For those policy changes that would result in a change of fare price, discount, or access, the existing ridership, including the minority and low-income status of those impacted by the change, was compared to the non-minority and non low-income ridership along with the overall systemwide demographics for EMBARK's fixed route services.

6.3 Minority Status Assumptions

For purposes of the fare equity review, minority populations are those who have not identified themselves as only "Caucasian/White" on the 2017 On-Board Transit Survey and those who identified their race as "White" and ethnicity as "Not Hispanic or Latino" on the 2012-2016 ACS 5-Year. Ethnicity/Race categories include:

- 1) American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- 2) Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- 3) Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
- 4) Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- 5) Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

6.4 Income Assumptions

EMBARK uses the Federal Department of Health and Human Services (HHS) thresholds for defining the low-income population. Using 100% of the HHS federal poverty level threshold, based on average household size of 2.5 from the 2017 On-Board Transit Survey, the EMBARK income threshold translates to households that make \$22,175 or less.

Table 2: Low-income Definition and Federal Poverty Rate 2016

PERSONS IN FAMILY/HOUSEHOLD	POVERTY GUIDELINE
1	\$11,880
2	\$16,020
3	\$20,160
4	\$24,300
5	\$28,440
6	\$32,580
7	\$36,730
8	\$40,890
For families/households with m	ore than 8 persons, add

Source: 2016 HHS U.S. Federal Poverty Guidelines

\$4,160 for each additional person.

On the 2017 On-Board Transit Survey, this threshold would correspond with respondents who reported a total household income in 2016 of less than \$29,999. As a result, the analysis may classify respondents as low-income even though their household income is above 100% of the federal poverty level. This may result in an overstatement of low-income ridership.

Table 3: 2017 On-Board Transit Survey Income Categories

Q25. Your annual household income in 2016
Less than \$10K
\$10K-\$19,999
\$20K-\$29,999
\$30K-\$39,999
\$40K-\$49,999
\$50K+

The federal poverty income thresholds used for the Census vary based on household size, age of the householder, and number of children. The thresholds are also updated each year using the Consumer Price Index (CPI-U). For the 2012-2016 ACS 5-Year data, the Census definition of 100% federal poverty level was used for the analysis. While this doesn't align with the 2016 HHS definition of federal poverty, this data is not used as a sole data point for the analysis but is used to corroborate other data assumptions.

Table 4: Poverty Thresholds for 2016 by Size of Family and Number of Related Children Under 18 Years

			Related children under 18 years							
Size of family unit	Weighted average thresholds	None	One	Two	Three	Four	Five	Six	Seven	Eight or more
One person (unrelated individual):	12,228									
Under age 65	12,486	12,486								
Aged 65 and older	11,511	11,511								
Two people:	15,569									
Householder under age 65	16,151	16,072	16,543							
Householder aged 65 and older	14,522	14,507	16,480							
Three people	19,105	18,774	19,318	19,337						
Four people		24,755	25,160	24,339	24,424					
Five people		29,854	30,288	29,360	28,643	28,205				
Six people	32,928	34,337	34,473	33,763	33,082	32,070	31,470			
Seven people	37,458	39,509	39,756	38,905	38,313	37,208	35,920	34,507		
Eight people	41,781	44,188	44,578	43,776	43,072	42,075	40,809	39,491	39,156	
Nine people or more	49,721	53,155	53,413	52,702	52,106	51,127	49,779	48,561	48,259	46,400

Source: U.S. Census Bureau.

7 Ridership Demographics Overview

The following provides an overview of the EMBARK's fixed route bus system-wide ridership taken from the 2017 On-Board Transit Survey. These demographic statistics have been considered in the development of the fare study recommendations in order to minimize or avoid the potential for changes to result in a Disproportionate Burden on low-income riders or Disparate Impacts on minority riders.

7.1 Ethnicity and Income

Because service type plays a role in determining impacts to the affected populations, information about the ethnicity and income for the system as well as by service type was a key part in the fare study.

The following Figures 1 and 2 provide a system-wide overview on ethnicity and income. For purposes of the analysis, and in this review, minority status is characterized as anyone who responded to anything other than "White/Caucasian." Low-income status includes households making below \$30,000.

Figure 1: Ridership by Minority Status

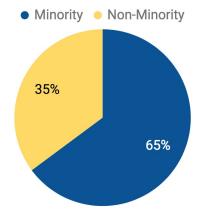
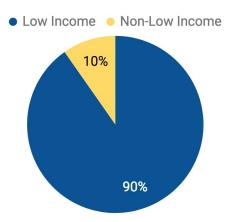


Figure 2: Ridership by Income



EMBARK also reviewed the income and ethnicity of by service type to recognize that various fare study recommendations may impact some protected groups more than others (e.g., changes to the Circulator fares). Tables 4 and 5 present ethnicity/race and income percentages by service type. Although the

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Downtown Discovery ridership is slightly more likely to be non-minority and non low-income, the Downtown Discovery demographics align with the systemwide demographics.

Table 4: Ethnicity/Race by Service Type

Service Type	Non-Minority	Minority
Route 50* (Downtown Discovery)	35%	65%
Local & Express	35%	65%
Systemwide	35%	65%

Notes:

Table 5: Income by Service Type

Service Type	Non Low-Income	Low-Income
Route 50* (Downtown Discovery)	12%	88%
Local & Express	10%	90%
Systemwide	10%	90%

Notes:

8 Fare Policy Changes & Fare Equity Review Findings

Based on the review of the fare policy changes in total, the proposed changes would not result in adverse effects being borne disproportionately by either minority or low-income riders. In general, the demographics of the riders who are impacted align with the demographics of EMBARK's systemwide fixed route bus ridership.

The following provides a summary of the review of each of the fare policy changes and their potential impacts on minority and low-income populations. Fare policy changes include:

- Rebranding of the Unlimited Pass as Universal Pass to be accepted on all fixed route services, including all fixed route bus and streetcar services
- Fare Increase on Downtown Discovery; establishment of Circulator fares and passes in preparation of the introduction of a streetcar; and introduction of a Circulator 30-Day Pass
- Introduction of an Annual Circulator Pass and an Annual Universal Pass

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- Increase of the senior age threshold from 60 to 65
- Elimination of change cards on fixed route
- Implementation of off-board fare payment for streetcar
- Introduction of mobile ticketing for fare payment

^{*} A limited number of surveys were collected on Route 50 as they make up a small share of EMBARK systemwide ridership. Due to a small sample size, statistical validity cannot be confirmed.

^{*} A limited number of surveys were collected on Route 50 as they make up a small share of EMBARK systemwide ridership. Due to a small sample size, statistical validity cannot be confirmed.

8.1 Analysis of Policy Changes

Proposed Policy Change #1: Rebranding of the Unlimited Pass as Universal Pass to be accepted on all fixed route services, including all fixed route bus and streetcar services

In order to encourage streetcar ridership and accommodate intermodal travel, EMBARK will be rebranding its Unlimited Pass as Universal Pass and accept it as valid fare payment on both fixed route bus and streetcar. No price change is proposed for these passes as part of the 2018 fare change.

EMBARK's Unlimited Passes are currently valid on Downtown Discovery, Local and Express bus services. During public outreach and surveys in April 2017, current EMBARK bus riders were strongly interested in using their bus passes on streetcar. Many said that they would not use streetcar unless it is included with their bus pass. Similar feedback was collected from during the October 2017 focus groups on the fare policy for Streetcar. While focus group participants were interested in a streetcar-only day pass, bus riders were interested a bus and streetcar day pass.

The passes are issued on magnetic stripe fare media that are activated upon use at the farebox. Because there will be no fareboxes to activate the passes on the streetcar, these paper Universal Passes must be activated onboard the bus at the farebox or by the Printer/Encoder Machine at the Downtown Transit Center prior to use. Once activated, Universal Passes would be accepted on both fixed route bus and streetcar services until the end of the validity period. For many riders, the first boarding made with their pass will be on bus so minimal impact is anticipated through this policy. In addition, 1-Day Passes are valid for 24-hours from issuance so riders have additional flexibility in when they purchase/activate passes.

With the introduction of mobile ticketing, riders will be able to activate their Universal Passes through their mobile ticketing app.

No adverse effects are anticipated by accepting the Unlimited Pass on Streetcar, as this would represent a benefit to riders including those who are minority and low-income.

Proposed Policy Change #2: Fare Increase on Downtown Discovery; establishment of Circulator fares and passes in preparation of the introduction of a streetcar; and introduction of a Circulator 30-Day Pass

EMBARK establishes fares based on similar service types. Currently, EMBARK has three service types for fixed route bus: Downtown Discovery, Local, and Express. In defining Circulator as a service type (in addition to Local and Express service types), this new fare policy would enable EMBARK to establish a fare for existing services that are reclassified as Circulator or for new Circulator routes that are introduced, such as streetcar.

In September 2017, the Downtown Discovery began charging \$0.50 cents per ride. Formerly, the fare was \$0.25 but was paid by an advertising sponsorship that has since expired. The proposed fare increase would help align the Circulator fare that would be valid on both the Downtown Discovery (Route 50) and the streetcar as well as any future Circulator services.

Similar to the Downtown Discovery, the future streetcar will provide a mobility option for travel in downtown Oklahoma City. As part of the launch of streetcar service, EMBARK will be modifying its Downtown Discovery (Route 50) since currently the Downtown Discovery and streetcar routes overlap in segments. Both will provide circulator service in downtown Oklahoma City. As such, it is proposed that the Downtown Discovery fare type be redefined as Circulator to encompass both Downtown Discovery and the future streetcar as well as any future Circulator type services in downtown Oklahoma City.

As part of the change, a fare increase is proposed. During the fare study, a detailed review of peer fare pricing for similar circulator/streetcar services was conducted as well as focus groups with downtown residents, employees, and visitors in October 2017 to obtain input on streetcar fare products, pricing, and fare payment. During the focus groups, a few fare options were presented for input. Participants preferred to pay \$1.00 for each single ride and \$2.00 for a round-trip, to paying \$1.75 for a 2-hour pass. Participants viewed single rides as preferable to a 2-hour pass since they would not need to be concerned about completing their return trip within two hours.

While focus group participants were interested in a single ride fare, it is difficult to enforce a single ride fare in a proof of payment environment such as on the streetcar where a rider must pay off board prior to boarding. Since operationally a single ride cannot be enforced, a 1-hour pass is proposed for streetcar instead of a single trip as offered on other Circulator services. A 1-hour pass would enable a rider to complete at least a one-way trip on the streetcar. On the D-Line (Downtown Line), the headway between streetcars is 12-14 minutes with an estimated round trip time of 40 minutes. On the B-Line (Bricktown Line), the headway between streetcars is 15 minutes with a round trip time of 15 minutes.

In addition to increasing the single trip/1-hour pass fare for Circulator services from \$0.50 to \$1.00 for Adult riders, a fare increase from \$1.00 to \$3.00 for Adult riders is proposed for the 1-Day Circulator Pass. Similar to the 1-Day Downtown Discovery Pass, the 1-Day Circulator Pass would be valid for 24-hours. In addition to being accepted on the Downtown Discovery, the pass would also be accepted on streetcar.

The proposed fare change would also result in the creation of a new 30-Day Circulator Pass priced at 32 times the single trip/1-hour pass Circulator fare and an Annual Circulator Pass priced at 12 times the 30-day pass price (discussed in Proposed Fare Policy Change #3). These passes would be issued through mobile ticketing and on paper magnetic stripe fare media issued by the Printer/Encoder Machine at the Downtown Transit Center.

Fare and pass prices are shown in Table 6. In addition to Adult fare and pass products, Reduced Fare options will be available for all fare and pass products at a 50% discount. The proposed fare change will also require updating the ADA paratransit fare for trips being completed within 3/4 of a mile of the Circulator service area.

Table 6: Current and Proposed Circulator Fares and Passes

	Cu	ırrent	Pro	posed	
	Adult	Reduced	Adult	Reduced	Proposed Validity
Circulator Fares					
Downtown Discovery Single Trip	\$0.50	\$0.25	\$1.00	\$0.50	Single boarding
Streetcar 1-Hour Pass	n/a	n/a	\$1.00	\$0.50	1 hour from purchase from ticket vending machine 1 hour from activation through mobile ticketing
Circulator Passes					
1-Day Pass/ Special Event Pass	\$1.00	\$0.50	\$3.00	\$1.50	Bus: 24 hours from activation at farebox Streetcar: 24 hours from purchase from ticket vending machine (or activation of magnetic stripe media on bus) Mobile: 24 hours from activation through mobile ticketing

	Cu	ırrent	Pro	posed	
	Adult	Reduced	Adult	Reduced	Proposed Validity
30-Day Pass	n/a	n/a	\$32.00	\$16.00	Bus: 30 days from activation at farebox Streetcar: 30 days from purchase from Transit Center (or activation of magnetic stripe media on bus) Mobile: 30 days from activation through mobile ticketing
Annual Pass	n/a	n/a	\$384.00	\$192.00	Paper: 1 year from purchase Mobile: 1 year from activation through mobile ticketing

The 30-Day Circulator Passes would be subject to the same technology limitations as Universal Passes, and any paper 30-Day Circulator Passes issued on magnetic stripe media would need to be activated prior to boarding Streetcar.

1-Day Circulator Passes issued from streetcar ticket vending machines would be accepted onboard Circulator bus services. These passes would be visually validated by the bus operator.

In 2016, 46,000 trips were taken on the Downtown Discovery. The introduction of streetcar is anticipated to increase ridership on downtown Oklahoma City Circulator services. As such, as part of the review of the fare increase for the Downtown Discovery, the demographic of current riders was also compared to potential new riders.

The demographics for both existing riders and potential new riders was obtained through the data supplied by the 2017 On-Board Transit Survey and 2016 Downtown Commuter Survey. 2012-2016 ACS 5-Year data was also used to view additional demographic information for potential new riders. The demographic data of existing riders included those with origins or destinations in Downtown Oklahoma City. Additional demographics of potential new riders were determined based on reviewing census data of those residing within a quarter-mile buffer around the Downtown Discovery (green line) and Streetcar routes (dark blue line) as well as in the greater Oklahoma City Metropolitan Area.



Figure 3: Downtown Discovery and Streetcar Routes

Generally, the demographics of current riders on the Downtown Discovery and traveling to or from origins and destinations within a quarter-mile of the current Downtown Discovery and/or proposed Streetcar route are similar to the EMBARK's systemwide fixed route bus demographics.

Table 7: Current and Potential New Rider Demographics for Circulator Services

		Current	Riders*		Pote	ential New Riders		
	Systemwide	Route 50 (Downtown Discovery)	Home Origin along Corridor	Work & School Destination along Corridor	Census Block Group Residents	Downtown Employees	Oklahoma City Metropolitan Area (Tourism)	
Non-Minority Percentage	35%	35%	38%	36%	52%	81%	66%	
Minority Percentage	65%	65%	62%	64%	48%	19%	34%	
Non Low-income Percentage	10%	12%	10%	12%	73%	94%	85%	
Low-income Percentage	90%	88%	90%	88%	27%	6%	15%	

Sources:

* A limited number of surveys were collected for current riders in these market segments. For example, while the survey asked zip code for the zip code of the respondent's workplace, nearly three-quarters of the survey respondents did not provide their work's zip code. Due to a small sample size, statistical validity cannot be confirmed.

When comparing the demographics of current vs. potential riders, there is a more significant difference. EMBARK's riders are more likely to be minority and below the federal poverty income threshold than the region's population. As such, the potential new riders are less likely to be minority and more likely to be higher income.

While the new Circulator services may help in attracting higher income riders and riders who are less likely to be minority, it is unlikely that the new service will attract riders with a significantly different demographic profile than the current transit ridership unless other transportation conditions change. This is supported by the 2016 Downtown Commuter survey that found only 1.1% of respondents use public bus for commuting.

The following tables provide an overview of the proposed fare changes for the Downtown Discovery in establishing Circulator fares. Only two fare products, and their Reduced Fare counterpart, will experience a change associated with the proposal: Cash/Coin and Value Card. All other fare products will not result in absolute change. Table 8 and 9 presents the percentage of Downtown Discovery riders by fare product and minority and income status based on the 2017 On-Board Transit Survey.

^{*} Current rider demographics based on 2017 On-Board Transit Survey.

^{*} Demographics of potential new riders - Census Block Group Residents and Oklahoma City Metropolitan Area (Tourism) based on 2012-2016 ACS 5-Year.

^{*} Demographics of potential new riders - downtown employees based on 2016 Downtown Commuter Survey. Notes:

Table 8: Downtown Discovery Ridership Distribution by Fare Product and Minority Status

		wntown Disc Respondents	•	Current	Proposed	Absolute	%
Fare Product	Non-Minority	Minority	All Riders	Fare	Fare	Change	Change
Cash/Coin	12.0%	39.9%	30.1%	\$0.50	\$1.00	\$0.50	100%
Value Card	n/a	1.5%	0.9%	\$0.50	\$1.00	\$0.50	100%
Day Pass	45.4%	30.3%	35.6%	\$4.00	\$4.00	\$0.00	0%
7-Day Pass	14.8%	13.1%	13.7%	\$14.00	\$14.00	\$0.00	0%
30-Day Pass	18.6%	15.2%	16.4%	\$50.00	\$50.00	\$0.00	0%
Reduced Fare Pass	9.3%	n/a	3.3%	\$2-\$25	\$2-\$25	\$0.00	0%
Total	100%	100%	100%				

Notes:

Table 9: Downtown Discovery Ridership Distribution by Fare Product and Income Status

		owntown Disc Respondents	•				
Fare Product	Non Low- income	Low- income	All Riders	Current Fare	Proposed Fare	Absolute Change	% Change
Cash/Coin	66.7%	26.2%	30.1%	\$0.50	\$1.00	\$0.50	100%
Value Card	n/a	1.4%	0.9%	\$0.50	\$1.00	\$0.50	100%
Day Pass	n/a	44.9%	35.6%	\$4.00	\$4.00	\$0.00	0%
7-Day Pass	n/a	13.5%	13.7%	\$14.00	\$14.00	\$0.00	0%
30-Day Pass	n/a	14.0%	16.4%	\$50.00	\$50.00	\$0.00	0%
Reduced Fare Pass	33.3%	n/a	3.3%	\$2-\$25	\$2-\$25	\$0.00	0%
Total	100%	100%	100%				

Notes:

The following analysis provides a review of the potential adverse effects experienced by minority and low-income riders associated with the fare change for the Downtown Discovery. In order to calculate the percentages of minority and low-income ridership for various fare categories, we used farebox data to reflect more accurately the fare payment distribution amongst the fare products. The 2017 On-Board Transit Survey was used to determine the allocation of non-minority and minority (as well as non low-income and low-income) ridership by fare product. It should also be noted that the number of on-board survey responses for Downtown Discovery was very low. In some cases, no respondents were provided for several fare products. As a result, the analysis required a significant amount of data-weighting, which may have resulted in unvalidated findings. Further data collection would be required to have more confidence that the data provided has rendered the most accurate results.

The analysis is summarized in Tables 10 and 11. Table 10 provides the analysis by minority status, while Table 11 provides the analysis by income. As previously noted, only two fare categories will experience change: Cash/Coin and Value Card. Since farebox data was used instead of the survey data to determine the percent of the proposed fare increase borne by a specific population, Value card is not differentiated from cash/coin riders who are paying for a single trip.

^{*} A limited number of surveys were collected on Route 50 (Downtown Discovery) as they make up a small share of EMBARK systemwide ridership. Due to a small sample size, statistical validity cannot be confirmed.

^{*} A limited number of surveys were collected on Route 50 (Downtown Discovery) as they make up a small share of EMBARK systemwide ridership. Due to a small sample size, statistical validity cannot be confirmed.

Table 10: Downtown Discovery Ridership Impacts by Minority Status

	Downton	wn Discovery F	Ridership					Non-Minority	Minority	
Fare Product	Non- Minority	Minority	All Riders	Current Fare	Proposed Fare	Absolute Change	% Change	Revenue Change	Revenue Change	All Riders
Downtown Discovery SIngle Trip										
Adult	1,169	7,361	8,530	\$0.50	\$1.00	\$0.50	100%	\$584.50	\$3,680.50	\$4,265.00
Reduced	943	1,730	2,673	\$0.25	\$0.50	\$0.25	100%	\$235.75	\$432.50	\$668.25
Downtown Discovery 1-Day Pass										
Adult	705	866	1,571	\$1.00	\$3.00	\$2.00	200%	\$1,410.00	\$1,732.00	\$3,142.00
Reduced	444	665	1,109	\$0.50	\$1.50	\$1.00	200%	\$444.00	\$665.00	\$1,109.00
Unlimited 1-Day Pass										
Adult	4,662	5,723	10,385	\$4.00	\$4.00	\$0.00	0%	\$0.00	\$0.00	\$0.00
Reduced	1,874	2,809	4,683	\$2.00	\$2.00	\$0.00	0%	\$0.00	\$0.00	\$0.00
Unlimited 7-Day Pass										
Adult	1,323	2,155	3,478	\$14.00	\$14.00	\$0.00	0%	\$0.00	\$0.00	\$0.00
Reduced	856	1,284	2,140	\$7.00	\$7.00	\$0.00	0%	\$0.00	\$0.00	\$0.00
Unlimited 30-Day Pass										
Adult	5,500	0	5,500	\$50.00	\$50.00	\$0.00	0%	\$0.00	\$0.00	\$0.00
Reduced	1,731	2,595	4,326	\$25.00	\$25.00	\$0.00	0%	\$0.00	\$0.00	\$0.00
Haul Pass 30-Day	196	293	489	\$22.00	\$22.00	\$0.00	0%	\$0.00	\$0.00	\$0.00
Haul Pass High School Juniors & Seniors	13	20	33	\$0.00	\$0.00	\$0.00	0%	\$0.00	\$0.00	\$0.00
Other	382	701	1,083	\$0.00	\$0.00	\$0.00	0%	\$0.00	\$0.00	\$0.00
Total	19,798	26,202	46,000					\$2,674.25	\$6,510.00	\$9,184.25
							Average	\$0.14	\$0.25	\$0.20
					F	Percent of To	tal Increase	35%	65%	
					% of Dow	ntown Disco	very Riders	43%	57%	

Table 11: Downtown Discovery Ridership Impacts by Income Status

	Downto	wn Discovery R	idership		Proposed Fare	Absolute Change	% Change	Non-Low Income	Low-Income	All Riders
Fare Product	Non Low-Income	Low Income	All Riders	Current Fare				Revenue Change	Revenue Change	
Downtown Discovery SIngle Trip										
Adult	2,182	6,348	8,530	\$0.50	\$1.00	\$0.50	100%	\$1,091.00	\$3,174.00	\$4,265.00
Reduced	329	2,344	2,673	\$0.25	\$0.50	\$0.25	100%	\$82.25	\$586.00	\$668.25
Downtown Discovery 1-Day Pass										
Adult	0	1,571	1,571	\$1.00	\$3.00	\$2.00	200%	\$0.00	\$3,142.00	\$3,142.00
Reduced	0	1,109	1,109	\$0.50	\$1.50	\$1.00	200%	\$0.00	\$1,109.00	\$1,109.00
Unlimited 1-Day Pass										
Adult	0	10,385	10,385	\$4.00	\$4.00	\$0.00	0%	\$0.00	\$0.00	\$0.00
Reduced	0	4,683	4,683	\$2.00	\$2.00	\$0.00	0%	\$0.00	\$0.00	\$0.00
Unlimited 7-Day Pass										
Adult	0	3,478	3,478	\$14.00	\$14.00	\$0.00	0%	\$0.00	\$0.00	\$0.00
Reduced	0	2,140	2,140	\$7.00	\$7.00	\$0.00	0%	\$0.00	\$0.00	\$0.00
Unlimited 30-Day Pass										
Adult	5,500	0	5,500	\$50.00	\$50.00	\$0.00	0%	\$0.00	\$0.00	\$0.00
Reduced	0	4,326	4,326	\$25.00	\$25.00	\$0.00	0%	\$0.00	\$0.00	\$0.00
Haul Pass 30-Day	0	489	489	\$22.00	\$22.00	\$0.00	0%	\$0.00	\$0.00	\$0.00
Haul Pass High School Juniors & Seniors	0	33	33	\$0.00	\$0.00	\$0.00	0%	\$0.00	\$0.00	\$0.00
Other	133	950	1,083	\$0.00	\$0.00	\$0.00	0%	\$0.00	\$0.00	\$0.00
Total	8,144	37,856	46,000					\$1,173.25	\$8,011.00	\$9,184.25
							Average	\$0.14	\$0.21	\$0.20
					F	ercent of To	tal Increase	41%	59%	
					% of Dow	ntown Disco	very Riders	18%	82%	

Sources:

- * Distribution of ridership by fare product based on farebox data from September 5, 2017 (reintroduction of fare on Downtown Discovery) April 23, 2018 (present).
- * Total ridership based on estimated ridership on Downtown Discovery in 2016.
- * Ridership demographics based on 2017 On-Board Transit Survey.

Notes:

- * A limited number of surveys were collected on Route 50 (Downtown Discovery) as they make up a small share of EMBARK systemwide ridership. Due to a small sample size, statistical validity cannot be confirmed.
- * The percentage of riders in the non-protected group is slightly higher than the percentage from the 2017 On-Board Survey due to the use of farebox data to determine allocation amongst fare products and the determination of demographics by fare products using the 2017 On-Board Survey.

There may be potential adverse effects on single trip riders. There would be no change for riders who pay currently with an Unlimited Pass. However, cumulatively, adverse effects may only be experienced by minority riders. The analysis in Table 10 reveals that adverse effects may be disproportionately experienced by minority riders for changes associated with this fare change for Downtown Discovery as 63% of the total increase is borne by minority riders, who make up 54% of the Downtown Discovery ridership -- a 9% difference. However, without a Disparate Impact policy that determines the threshold for determining when adverse effects are borne disproportionately by minority populations, a finding of Disparate Impact cannot be made.

Proposed Policy Change #3: Introduction of an Annual Circulator Pass and an Annual Universal Pass

The proposed fare change would introduce an Annual Circulator Pass and an Annual Universal Pass. These annual passes would be issued through the mobile ticketing app as well as from the Downtown Transit Center. The passes would be priced at (12) 30-Day Passes and as such would not provide a financial benefit but instead a convenience option, especially for businesses and third-parties interested in buying passes for their employees/members.

Annual passes would be valid from 1 year of purchase for paper passes and 1 year from activation for mobile ticketing.

Since no discount will be provided and the annual passes would be available through the mobile ticketing app or through the Downtown Transit Center, no adverse effects are anticipated by introducing an Annual Circulator Pass or an Annual Universal Pass.

Proposed Policy Change #4: Increase of the senior age threshold from 60 to 65

EMBARK would increase the age threshold to qualify for senior fare discounts to 65 from 60, which it is currently. FTA requires grantees to offer half-fare discounts on single trip peak fares to seniors during the off-peak. The FTA defines seniors as individuals who are 65 or older but permits grantees to extend senior discounts to younger persons. Among EMBARK's 11 peers, eight have set the senior age threshold at 65; only Albuquerque, Colorado Springs, and Tulsa have lower age thresholds. While EMBARK's local bus fares are comparable to its peers, the senior age threshold is notably lower. During the fare study, it was determined that increasing the age threshold would provide greater financial stability for the agency as the population of individuals 60-65 increases.

The age requirement would only apply to new applications dated July 29, 2018 or later. Customers already carrying an EMBARK Reduced Fare Benefit card would continue to receive the Reduced Fare.

The percentage of the current riders ages 60-64 who are minority or low-income align with the systemwide percentages as shown in Tables 12 and 13. As such, adverse effects of this change would be distributed equally among both minority and non-minority riders and low-income and non low-income riders as a result of increasing the senior age threshold from 60 to 65 years.

Table 12: Ethnicity/Race by Age

Age	Non-Minority	Minority
Individuals 60-64	36%	64%
Systemwide	35%	65%

Table 13: Income by Age

Age	Non Low-Income	Low-Income
Individuals 60-64	12%	88%
Systemwide	10%	90%

Proposed Policy Change #5: Elimination of change cards on fixed route

As of July 29, 2018, change cards would no longer be issued from fixed route fareboxes. However, any fare change card issued prior to July 29, 2018 would be honored through June 30, 2019.

The fareboxes on EMBARK's buses and paratransit vehicles issue change to riders on paper magnetic stripe tickets. These change cards are accepted by fareboxes towards payment of fares for future trips. While issuing change cards provides a benefit to the rider by not requiring them to carry the exact fare, it is uncommon in the transit industry to give change or to issue change cards and most transit agencies that previously issued change cards no longer offer them.

In order to reduce farebox maintenance costs, minimize farebox related road calls, extend the life of EMBARK's fareboxes, and minimize operational delays caused by issuing change cards, EMBARK has proposed discontinuing issuance of change cards on fixed route service. This will require an education process and a change in rider behavior, but it will result in a consistent policy for fixed route bus and streetcar services as streetcar ticket vending machines will not issue change.

In the 2017 fiscal year, the majority of EMBARK's boardings (77%) on paratransit and fixed route were paid with a pass. Only 5% of total boardings were issued a change card. While the average value of the change cards cannot be readily determined, based on fiscal year 2016 farebox data, the majority of bills collected are \$1s or \$5s with limited number of \$10s and \$20s collected:

- 92.5% of bills collected by the farebox are \$1s
- 6% of the bills collected are \$5s
- 0.7% of the bills collected are \$10s
- 0.6% of the bills collected are \$20s

As such, it is likely that many of the change cards are for amounts less than \$5 with many less than \$1. This aligns with the feedback that was received during the April 2017 public outreach and surveys. Many riders noted that they prefer to pay exact change instead of receiving a change card.

At this time, eliminating change cards on paratransit vehicles is not proposed. Change cards provide an important way for these riders to pay for paratransit service, especially in the absence of passes. Change cards also provide a benefit for riders with limited mobility to handle exact change and for rides that are paid by caregivers. Also, fareboxes on paratransit vehicles are not used as frequently as fixed route fareboxes, so maintenance issues onboard paratransit is not as great a concern.

No adverse impacts are anticipated by discontinuing change cards on fixed route bus services as it does not impact the price of the fares paid and would only impact up to 5% of total boardings. Additionally, as the proposal does not include paratransit, the total number impacted may be less. However, no finding of Disparate Impact of Disproportionate burden could be determined until policies are adopted that establish thresholds of disproportionate adverse effects.

Proposed Policy Change #6: Implementation of off-board fare payment for streetcar

As part of the fare collection strategy developed as part of the fare study, EMBARK is installing wayside ticket vending machines at each streetcar station. Riders will use these machines to pay their fare and receive a paper ticket. Ticket vending machines will issue 1-hour Streetcar and 1-Day Circulator Passes. The ticket vending machines will require exact change to reduce the complexity of the machines and thus lower costs. The ticket vending machines will accept coins and credit/debit cards only. By structuring operations so that customers purchase their fare before they board the streetcar, wayside ticket vending machines enable customers to board through all doors, reducing dwell time at each stop and speeding up operations.

In addition to Circulator fares available at the ticket vending machines, 1-Day, 30-Day, and Annual Passes on paper magnetic stripe media would be available from the Downtown Transit Center. Paper Universal and Circulator Passes would be accepted on streetcars as long as the passes have been activated prior to boarding.

To supplement the wayside ticket vending machines and in an attempt to expand EMBARK's ridership more generally, EMBARK is pursuing mobile ticketing technology (Proposed Policy Change #7). Activated fares and passes purchased through the mobile ticketing app would be accepted.

Unlike on the bus, streetcar fares would not be enforced by the operator. To combat fare evasion onboard streetcars, fare enforcement officers will periodically board vehicles to check that each passenger has a valid proof of payment. Fare citations would be issued for fare evaders.

Because the ticket vending machines will collect both coins as well as credit/debit cards, no adverse effects are anticipated by implementing off-board fare payment for streetcar.

Proposed Policy Change #7: Introduction of mobile ticketing for fare payment

Mobile ticketing enables a rider to purchase their fare using a smartphone or tablet, on which the ticket is then housed. Mobile ticketing also helps facilitate integration between bus and streetcar because a mobile ticket could be used to board either service.

Mobile ticketing requires the user to have a compatible smartphone or table in order to install the app as well as a credit or debit card to purchase fares or passes through the app. EMBARK is working with its mobile ticketing vendor on strategies to minimize barriers to using the app by accepting prepaid debit cards and ensuring that the app supports some of the older but recent operating systems. EMBARK is also exploring ways for cash riders to be able to purchase fares and passes at select locations with cash to load onto mobile devices.

In addition to purchasing bus and streetcar fares and passes, mobile ticketing users would be able to pay for ferry service.

Despite some of the barriers with mobile ticketing, no adverse impacts are anticipated as all fares and passes that are planned to be made available through the mobile ticketing app will also be available in paper form.

8.2 Adverse Effects and Next Steps

As previously noted, without policies that establish thresholds for determining whether suggested changes would result in minority and low-income riders bearing a disproportionate share of the impacts, a finding of Disparate Impact or Disproportionate Burden cannot be made. However, as there is a potential adverse effect of increasing the Downtown Discovery fare and 1-Day pass on minority riders, once the Disparate Impact and Disproportionate Burden Policies are in place and thresholds have been established, the adverse effects of the increase on minority riders should be evaluated to confirm there is no Disparate Impact on minority riders.

EMBARK should not wait until the next Title VI submission cycle to develop its policies and procedures associated with Fare and Service Equity Analyses. An agency must have the necessary Major Service Change, Disparate Impact and Disproportionate Burden policies and analysis procedures by the time they meet the large fixed route transit provider definition. While EMBARK may not know the precise date that they will cross over the 49 vehicle threshold, they should have some certainty as to the estimated date in which they will deploy that 50th vehicle. As such, EMBARK must assess how quickly it can develop policies and procedures, conduct public outreach on the policies, present the recommendation to the Board of Trustees, and get Board approval in order to ensure full compliance with C4702.1B.

Appendix A: Major Service Change Policy

Appendix B: Public Engagement Summary Report



Public Engagement

SUMMARY REPORT

Proposed Winter 2019 Service Changes

Community Meetings held on:

Wednesday October 16, 2018 5 pm Transit Center

Thursday October 17, 2018 5 pm Transit Center

Public Hearing held on:

Friday, November 2, 2018 9 am City Council Chambers

November 30, 2018

Michael Scroggins | Manager of Marketing, Customer Relations, and Technology Chip Nolen | Manager of Scheduling and Short Range Planning

The content of this report is draft material, specific to project development for proposed bus service modifications and fare changes and does not necessarily reflect the official view or policies of COTPA or FTA at the time of publication. This report does not constitute a contract, standard, or specification, or regulation.

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I. INTRODUCTION

Central Oklahoma Transportation and Parking Authority (COTPA), operating as EMBARK, held two community meetings regarding various proposed bus changes. The purpose of the public engagement process was to update the public on current status of the project, communicate the proposed implementation schedule and hearing date, and receive comments and feedback on the proposed changes. Additionally, the meetings served as an opportunity for public feedback and comment leading up to the formal hearing on November 2, 2018 during the EMBARK board meeting. EMBARK staff proposed three changes as part of the Winter 2019 service changes.

A. Background

- 1. Move route 9 to go along General Pershing all the way to May and continue its regular route on Reno in both inbound and outbound directions
 - a) This change will help serve new social service agencies recently built along this portion of road including Northcare and Positive Tomorrows. Route 009 will no longer go south on Villa or on Reno between Villa and May.
 - b) This change will not require additional resources.
 - c) Service span and frequency will stay the same.
- 2. Move route 8 to go along SW 3rd and Virginia Ave. before continuing on its regular route in both inbound and outbound directions
 - a) This change will serve the Homeless Alliance on Virginia Ave. without taking away service from another area. Route 007 will still utilize Linwood Blvd.
 - b) This change will not require additional resources
 - c) Service span and frequency will stay the same
- 3. Add Sunday bus service
 - a) The service level and frequency will mirror Saturday service exactly.
 - b) This change is possible because of a funding increase from City Council
 - c) It is a need identified in our annual rider surveys and past planning studies as a desired service improvement for our community

II. PUBLIC ENGAGEMENT

A. Notification Efforts

Public meeting notifications were posted across multiple media platforms, in English, Spanish and Vietnamese. The public was notified by newspaper, rider alerts, on board notices, and social media channels (embarkok.com, Twitter, and Facebook). Appendix A contains copies of meeting notices and publications which included:

- Advertisements in the Journal Record, Black Chronicle, and El Nacional de Oklahoma news print
- Emails were sent to existing ADA customers
- Social Media notifications via Twitter and Facebook
- Notices via embarkok.com

EMBARK spent \$1,734.13 to ensure the meetings were promoted.

B. Community Meetings

Two community meetings were held. The times, locations and attendance for each community meeting is as follows:

```
Wed, October 16, 2018 | 5:00 pm – 6 pm | Transit Center | 0 attendees

Thurs, October 17, 2018 | 5:00 pm – 6 pm | Transit Center | 3 attendees
```

The format for each community meeting was intended to be identical. It was planned that staff would give a brief presentation followed by a question and answer session. Sign-in sheets, handouts, and maps were available at each session.

The format of the hearing was intended to be like the community meetings. Staff gave a brief presentation, provided an update on the two community meetings previously held, and concluded with an opportunity for the Board to hear comments and feedback regarding the proposed changes. Sign-in sheets, handouts, and maps were available at each session.

Comments: Three people attended the Thursday, October 17th community meeting. After hearing the presentation all three were

supportive of the proposed changes and provided no further input on the topic presented.

C. Public Hearing Attendance and Comments

Meeting: Public Hearing

Date: Friday, November 2, 2018

Time: 9 AM

Location: Oklahoma City Council Chamber, downtown Oklahoma City

Citizens in attendance: 0

A public hearing was held Friday, November 2, 2018 at 9 am in the City Council Chambers of City Hall located at 200 N Walker Ave, Oklahoma City, 73102. The hearing was a part of the COTPA Board Meeting. No residents were in attendance and no one addressed the COTPA Board of Trustees.

Comments: The public hearing was held during the monthly COTPA board meeting, which is also broadcast on Oklahoma City's local TV channel. No residents chose to provide feedback to the board.

III. APPENDICES

Appendix A. Meeting Notifications

Appendix B. Meeting Materials

Appendix C. Sign-In Sheets

Appendix D. Public Comments Received as of 12-6-18

APPENDIX A Meeting Notifications

NOTICE OF PUBLIC HEARING & COMMUNITY MEETINGS CENTRAL OKLAHOMA TRANSPORTATON AND PARKING AUTHORITY (COTPA) SEEKS PUBLIC INPUT ON PROPOSED SERVICE CHANGES ON ROUTES 008 AND 009 AND THE IMPLEMENTATION OF SUNDAY BUS SERVICE

(Journal Record, Black Chronicle, El Nacional and Dan Quyen)

The Central Oklahoma Transportation and Parking Authority (COTPA) hereby provides notice of a Public Hearing and two Community Meetings in order to receive comments on proposed bus service modifications and fare changes planned for implementation January 27, 2019. Proposed changes include:

- Modifying Route 008 to serve Douglas to NW 3 then from NW 3 to Virginia Ave and continue its normal route for both inbound and outbound directions. Route 008 will no longer serve Linwood Blvd.
- Modifying Route 009 to serve General Pershing to May then May to Reno for both inbound and outbound directions. Route 009 will no longer serve Villa from General Pershing to Reno or Reno from Villa to May.
- Adding regularly scheduled bus service on Sundays for routes 002, 003, 005, 007, 008, 009, 010, 011, 012, 013, 014, 016, 022, 023, 038, 040, and 050.
- Adding existing EMBARK Plus ADA service on Sunday.

Based on input gathered at the meetings and hearing, the COTPA Board of Trustees will act on these changes in December and implementation would occur on January 27, 2019. All comments (written or oral) received during these events will be considered when evaluating the proposals. The full schedule is listed below.

Community Meetings

Tuesday, October 16, 2018 – 5:30 p.m.Downtown Transit Center – 420 NW 5 St., OKC, OK 73102 Most Routes

Wednesday, October 17, 2018 – 5:30 p.m. Downtown Transit Center – 420 NW 5 St., OKC, OK 73102 Most Routes

Public Hearing

Friday, November 2, 2018 – 9 a.m. City Hall – 200 N Walker Oklahoma City, OK 73102 Most Routes

The same content will be presented at all meetings.

Process for Receiving Comments

The COTPA Board of Trustees encourages public comments at community meetings, on the date of the public hearing or in writing beforehand. Those desiring to speak at the Public Hearing should contact EMBARK 405-297-1331 to register. Advance registration will be accepted until 4 p.m. on the day prior to the hearing. Those who have not pre-registered may sign up immediately before the hearing begins and will be scheduled to speak after those who have pre-registered. In addition, written comments received any time before the hearing is adjourned will become a part of the official hearing record. Written comments may be submitted on the date of the hearing, emailed to embarkok@okc.gov, or mailed in advance to:

EMBARK Attn: 2019 Winter Service Changes 2000 S May Ave Oklahoma City, OK 73108

Individuals submitting written comments must include their name, address, email, and phone number.

Notice for the Hearing and Visually Impaired

If you wish to attend the public hearing and need sign language interpretation, please notify EMBARK at least 72 hours in advance by calling *711. Ask the operator to call 405-235-7433.

For Additional Information

Visit embarkok.com or contact Customer Relations at 405-235-7433 for more information.

Si desea obtener la información en otro idioma, llame al 405-235-7433.

Neáu quyù vò caàn thoâng tin baèng ngoân ngõõ khaùc, xin lieân laïc 405-235-7433.

如您需要其他语言版本的信息,请致电 405-235-7433.

The Black Chronicle

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Legal Notices-45

THE Oklahoma City Housing Au-thority at 1700 Northeast Fourth THE Chiahoma City Housing Authority at 1700 Northeast Fourth-Strott, Oklahoma City, Oklahoma, in requesting useful bids for Retaining Walls, AMP 103. Ambassabe Court, Oklahoma, Bid requirements useful court of the control of the court of t

Lagal Nodces-45

THE Oklahoms City Houring Authority will receive sailed Request for Proposals at 1700 Northeast Fourth Street, Oklahoms City, Oklahoms, 23117, for Meal and Adult Activity Service (A Scalor Services Programs In Mane McKure Plaza, 1316 N E. 12* Street, The Towers, 135 N, W. 12* Street, The Towers, 135 N, W. 12* Street, Andrews Square, 2101 S. Harvey Ave., Hilkrens Seruer Center, 2372 S W, 59* Street, and Candiel Jake Sensor Center, 3540 N W, 56* Street, Charles Sensor Center, 3540 N W, 56* Street, Charles Sensor Center, 3540 N W, 56* Street, Andrews Services and all particulare may be obstanced from Sherry Hearn, at 1700 Northeast Fourth Speed or by entail at shearn schools of the Street Control o THE Oklahoma City Housing Au-

Housing Opportunity
THE Oklahoma Cityl Housing Audinority at 1700 Northeast Fourth Street,
Oklahoma City, Oklahoma, is requested as a sealed labe to Rarrof, AMF 111,
Marie McCuite Plaza, 1316 N E
22 St, Oklahoma City, Oklahoma
Bid requirements may be obtained
from the Moderinzation Coordinator
toward are hand only or (405) 602.
5533. There is no charge for entail
documents: A \$25.00 neuerfundable
for will be charged for all hand copy
bid documents and \$10.00 for all CTM.
A proble conference will be held 9 00. A probid conference will be held 9:00 a m., Thursday, October 25, 2018, at AMP 111, Marie McGutre Plaza, 1316 N E. 12th St., Oklahoma City, Oklahoma. Deadline for substitutiones is 1:00 p.m., Thursday, November 8, 2018. Senied bids will be received at the Oklahuma City Housing Authority, 1700 Northeast 4th Street, until 1:15 p m., Tuesday, November 20, 2018. Equal Employment Opportunity Equal Housing Opportunity

FIREFIGHTERS The City of Edmond,

Oktahoma has scheduled a recruitment period for Pirefighters. Applicants must be at least 18 years old, must meet all requirements of the Oklahoma Furfighters Pension and Retirement system, possess a high school di-ploma or GED equivalent, a riving record acceptable to the City's insurance carrier a valid driver's license and have no felony convictions.
Applicants will be required to pass a writtentest, a physical ability agility test, poly graph examination, and the state re-quired physical examination. All applicants must possess. or obtain a minimum cemfi-cation of a Nationally Registered Emergency Medic Technician-Basic (EMT-B) within 18 months from date of hire and maintain certification and approval to operate under the Department Medi-cal Director' for the duration of employment with the City of Edmond Fire Department The base salary during the recruit academy is \$3,230.09 per month. After completion of the recruit academy training, the base salary will be \$4,916.09 per month. Applications will be accepted electronically and training. electronically only starting Monday, October 1", 2018 until 5 00pm Wednesday, October 24th, 2018 Prefer coce percentage points will be given for individuals havbe given for individuals lav-ing their EMT-R and EMT-P. For more information or to submit an application elec-tronically, visit edmondfd.

applications for the following

Financial Aid Clerk cation and experience. Excellent benefits. For a detailed job de-

scription, application procedure nen www.ascok.edu Submit application packets to Seminole State College Atta: Human Resources P.O. Box 351 Semanole, OK 74818

INVITATION TO BID

The Community Action Agency will be accepting bids on Full Post Control Services. Bid packto may be picked up from fam to 4pm Monday thru Friday (2.319 SW 25° St OKC, OK 73109, or call 232-0199 ext. 2400, Your bid must be returned to this Agency not later than 5.00 P.M. Ocaober 25° 2018, EEO

Advertise Today!

INVITATION TO RID

The Community Action Agency will be accepting bids on Fire Equipment Inspection Only. Bid packets may be picked up from 8am to 4pm Monday thru Friday @ 319 SW 25th St. OKC OK 73109, or call 232-0199 ext. 2400 Your bid must be returned to this Agency not later than 5:00 P.M., October 22, 2018. EEO M/P, H

The Black Chronicle

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NOTICE OF PUBLIC HEARING & COMMUNITY MEETINGS CENTRAL OKLAHOMA TRANSPORTATON AND PARKING AUTHORITY (COTPA) SEEKS PUBLIC INPUT ON PROPOSED SERVICE CHANGES ON ROUTES 008 AND 009 AND THE IMPLEMENTATION OF SUNDAY BUS

arnal Record, Black Chronicle, El Nacional and Dan Ouven

The Central Oklohoma Transportation and Parking Authority (COTIVA) bereby growldes notice of a Public Horning and two Community Meetings on order to receive comments on proposed but service modifications and fare changes planned for implementation January 27, 2019. Proposed changes include:

Modifying Roste 008 to serve Douglas to NW 3 then from NW 3.5 Virginia Ave and continue its normal route for both inbound and out directions. Route 00R will no longer serve Linwood Blvd.

*Modifying Roule 009 to serve General Pershing to May then May to Be for both inbound and outbound directions. Route 009 will no longer so Wills from General Pershing to Reno or Reno from Villa to May.

Adding regularly scheduled bus service on Sundays for routes 002, 003, 005, 007, 008, 009, 010, 011, 012, 013, 014, 016, 022, 023, 038, 040

Adding existing EMBARK Plus ADA service on Sunday

Hassed on input gathered at the meetings and hearing, the COTPA Heard of Trustees will not on these changes in December and implementation would occur on January, 27, 2019. All comments (written or oral) received during these events will be considered when evaluating the proposals. The full schedule is listed below.

Community Meetings

Tuesday, October 16, 2018 – 5:30 p.m. Downtown Transit Center – 420 NW 5 St., OKC, OK 73102 Most Routes

Wednesday, October 17, 2019 – 5:30 p.m. Downtown Transit Center – 420 NW 5 St., OKC, OK 73102 Most Routes

Public Hearing

Friday, November 2, 2018 + 9 u.m. City Hall - 200 N Walker Oklahoma City, OK 73102

The same content will be presented at all meetings

The same content will be presented at all needings.

Pricona for Receiving Comments.

The COTIPA Board of Trustees encourages public comments at community meetings, on the dark of the public hearing on speak at the Public Hearing should contact EMBADK.

405-1297-1331 to register. Advance-registration will be accepted until 4 print of the day prior to the hosting. Those who have not pre-registrated may sign up summediately before the hosting begins and will be scheduled to speak after those who have pre-registrated. In addition, written continues received any time before the hosting to adjourned will become a pain of the of the hearing, execut. Myritten comments may be submitted on the of the hearing, emailed to culturable Activity, active, author or marked or advance to

PMBARK

Atta 2019 Winter Service 2000 S May Ave Oklahoma City, OK 73108

individuals submitting written comments must include their name, address email, and phone number

Notice for the Henring and Visually Impaired If you wish to attend the public hearing and need sign language interpreta-tion, please acity EMHARK at least 72 hours in advance by calling *711 Ask the operator to call 405-235-7431.

For Additional Information
Vini embarkok com or contact Customer Relations at 405-235-7433 for

Si deses obtener la información en otro idioma, llame ni 405-235-7433 Neśu quyú vớ coán thoàng tin baing ngoàn agoà khoặc, xin heán link 405-235-7433

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om/hire EOE

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Qualities required Highly organized Excellent Communication skills Experience loading an organization Champion spirit Servani teader Sunny sitilude Problem-solving

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OKC, OK 73118

405-213-1888

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- Architectural, Landscape Architectural, City Planning and Urban Design Services
- Acquisition and Relocation Services Civil Engineering and Traffic Studies
- Independent Appraisal Services
 Title Examination and Title Insurance
- Land Surveying Services
 Emironmental Assessment and Testing
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Community Engagement Services

The selection process will be initiated by the submission

The selection process will be initiated by the submission of formal written proposals to OCURA and OCRA in accordance with the instructions and requirements in each respective RFP Each RFP may be obtained at ocura-ok org/rfps or hard copies may be obtained for a non-refinishele fee of thirty dollars (\$10.00). All written proposals for each respective RFP will be received at the oilieus of OCURA and OCRA, 105 N; Hudson Ave, Suite 101, Oklahoma City, Oklahoma 73102 until \$3.00 p.m. C.S.T. on Wednesday, October 31, 2018. Any proposals received after this time will be returned unopened to the prospective proposer. Proposals will be publicly opened and read aloud by OCURA and OCRA at 3:00 p.m. C.S.T. on October 31, 2018 in the conference room of the offices of OCURA and OCRA at 3:00 p.m. C.S.T. on October 31, 2018 in the conference room of the offices of OCURA and OCRA and OCRA of the offices of OCURA and OCRA of the office of OCURA and OCRA office of OCU

04-6780 or cynthia mecallum a theillianceole, are

This invitation for prefessional service proposals will not create any legal obligation for OCURA or OCRA to enter into a contract for services except on terms and conditions it deems in its discretion to be satisfactory and desimble and the right is eserved to reject any and all proposal

Go to sunbeamfamilyservices, org and click "careers" to apply Equal Opportunity Employer

OKLAHOMA ALCOHOLIC BEVERAGE LAWS ENFORCEMENT COMMISSION NOTICE OF INTENTION TO APPLY FOR AN ALCOHOLIC BEVERAGE LICENSE

ALCOHOLIC BEVERAGE LICENSE Inaccordance with Tile 37-A, Section 2-141 Zodiac Motorcycle Chib III1 North Martin Luber King Boules and, Oklahoma City, Okhahoma 73117 a/an Motorcycle Chib. hereby publishes notice of ig intention to apply within sixty days from this date to the Oklahoma Alcoholic Beverage Laws Enforcement Commission for a Recall Beet and Retail Wire. License under authority of and in compliance with the said Act. That is lineades) if gamedo such liberates premained to operate as a Recall Beet and Retail Wire. License under authority of under the said Act. That is lineades) if gamedo such liberates premained social of in 1111 North Martin Lubert King Boules and in Oklahoma City. Oklahoma, Oklahoma under the business name of Zodiac Motorcycle Chib. Zediac Motorcycle Club

Signature of applicant (s): If partnership, all partners must sign. If corporation an officer of the corporation must sign. If limited liability company a manuser must sign.

Elvis L. Patton

County of Oklahoma. State of Oklahoma

Before me, the undersigned notary public, personally appeared.

Elvis L. Partien
To me known to be the person (s) described in and who executed the foregoing application and acknowledged that he executed the same as his free act and deed.

09/22/2021

The Black Chronicle JASSIRI

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HOMES Churches one day various time. Others families extra worship-ping. Revelations 2:11. Acts 20:20. Matthew 19:10-12. Minister repremannew 19:10-12 Minister representatives. Beginners, premarini, loose dates, honeymoon, rehound, weddings, fineralle holy water, beginners. anointing, fasting, Mark 9.4) Delbert 405-902-6398

FIREFIGHTERS

The City of Edmond, Oldahoma has scheduled a recruitment period for Fire-fighters. Applicants must be at least 18 years old, must meet all requirements of the Oklahoma Firefighters Penon and Retirement system. seen and Retirement system, poxsess a high school di-ploma or GED equivalent, a driving record acceptable to the City's insurance carrier, a valid driver's license and we no felony convictions Applicants will be required to Apparatus will be required to pass a written lest, a physical ability/agality test, polygraph examination, and the state reuired physical examination All applicants must possess, or obtain a minimum certifi-cation of a Nationally Reg-istered Emergency Medical Technician-Basic (EMT-B) within 18 months from date ion and approval to operate under the Department Medi-cal Director' for the duration of employment with the City of Edmond Fire Department. The base salary during the recruit academy is \$3,230.09 per month. After completion of the recruit academy trainof the recruit academy frain-ing, the base salary will be \$4,916.09 per month. Ap-plications will be accepted electronically only starting Monday, October 1º 2018 until 5:00pm Wednesday. October 24th, 2018 Prefercirce percentage points will be given for individuals hav-ing their EMT-B and EMT-P. For more information or to submit an application elec-ronically, visit edmondfd om/hire EOE

Classified Deadline Is Tuesdays At 1 p.m.!



kitty, kitty, You'd shock to make life in easy to secur or hid with a riskon problem, but the right count advances obstace. One is four



OKLAHOMA ALCOHOLIC BEVERAGE LAWS ENFORCEMENT COMMISSION NOTICE OF INTENTION TO APPLY FOR AN ALCOHOLIC BEVERAGE LICENSE

ALCOHOLIC BEVERAGE LICENSE In accordance with Title 37. Section 32.141 Ille 374. Section 2-1.41 Zedias. Motorcycle Club. 1111 North Martin Luther King Boutevard, Oklahoma. City. Chilahoma. 27117 avan Motorcycle Club. hereby publishes rotte of fig. intervision to apply within every days from this date to the Oklahoma Alcoholic Beverage Laws Enforcement Commission for a Rectal Beer and Retail Wine. License urder authority of and in compliance with the said Act: That if Interd(s) if ganated such increase to open a section of the compliance with the said Act: That if Interd(s) if ganated such increase to a retail Beer and Retail Wine. Licenses urder without the business premises located at J111 North Martin Lather King Boulevard in Oklahoma. Cit.; Oklahoma under the business name of Zodiac Motorcycle Club.

Dated this 9th day of October 2016

Signature of applicant (s): If partnership, all partners must sign. If corporation an officer of the corporation must sign. If limited liability pany n manager must sign.

Elvis L. Parton

County of Oklahoma. State of Oklahoma

Before me, the undersigned notary public, personally appeared; Elvis L. Patton

To me known to be the person (s) described in and who exec foregoing application and acknowledged that he executed the same as his free act and deed.

C Parsons (Notary Public) 09/22/2021 (My commission expires)

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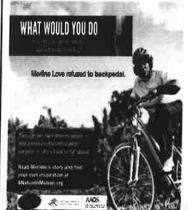
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NOTICE OF PUBLIC HEARING & COMMUNITY MEETINGS CENTRAL OKLAHOMA TRANSPORTATON AND PARKING AUTHORITY (COTPA) SEEKS PUBLIC INPUT ON PROPOSED SERVICE CHANGES ON ROUTES 008 AND 009 AND THE IMPLEMENTATION OF SUNDAY BUS SERVICE

Journal Record, Black Chronicle, El Nacional and Dan Quyen)

The Central Oklahoma Transportation and Parking Authority (COTPA) hareby provides notice of a Public Houring and two Committely Meetings in addr to receive comments on proposed bus service modifications and fare changes planned for unplementation January 27, 2019. Proposed

•Modifying Route 008 to serve Douglas to NW 3 then from NW 3 to Varginia Ave and continue its normal route for both inbound and outbound directions. Route 008 will no longer serve Linwood Blvd.

*Modifying Route 009 to serve General Pendung to May then May to Refor both informed and outhoused directions. Route 009 will no longer ser Villa from General Penshing to Reno or Reno from Villa to May.

*Adding regularly scheduled but service on Sunday's for routes 992, 901, 005, 007, 008, 009, 010, 011, 012, 013, 014, 016, 022, 021, 038, 040,

Adding existing EMBARK Plus ADA service on Su

Based on input guthered at the meetings and bearing, the COTPA Board of Trustees will act on these changes in December and implementation would occur on January 27, 2019, All comments (written or orn!) received during these events will be considered when evaluating the proposals. The full schedule is linted below.

Community Meetings

Donahown Transit Center - 420 NW 5 St., OKC, OK 73102 Most Routes

Wednesday, October 17, 2018 – 5:30 p.m. Downtown Transit Center – 420 NW 5 St., OKC, OK 73102 Most Routes

Friday, November 2, 2018 - 9 n.m. City Hall - 200 N Walker Oklahoma City, OK 73 102 Most Routes

The same content will be presented at all meetings

Process for Receiving Comments
The COTPA (Sourd of Trustees encourages public commi

The COTIA's food of Trustees encourages public comments at commission meetings, on the date of the public human or in writing beforehand. Those detriting to speak at the Public Human of the accepted until 4 pm on the day prior to the bearing. Those who have not pre-registered may man up immediately before the human begans and will be accepted until 4 pm speak after those who have pre-registered. In addition, written comments received any time before the hoating is adjustated with become a part of the effects have a cost. While in a official hearing record. Written comments may be submitted on the date of the hearing consisted to <u>cinbuly</u> is 400, 213, or mailed in advance to

EMBARK

Atta. 2019 Winter Service Changes

2000 S May Ave Oklahoma City, OK 73108

Individuals submitting written comments must uselude their name, address nail, and phone mumber

Notice for the Hearing and Visually Impaired If you wish to attend the public hunting and need sign language interpreta-tion, please notify FMBARK at least 72 hours in advance by calling *711 Ask the operator to call 405-235-7433

For Additional Information Visit emberkek com or contact Customer Relations at 405-235-7433 for

Si desea obtener la información en otro (dioma, llame id 405-235-7433 Neau quyều vớ cuấn thoáng tin baếng ngoàn ngôc khoắc, xin lieất lại:

THÔNG BÁO VỀ ĐIỀU TRẦN CÔNG KHAI & CÁC CUỘC HỌP CỘNG ĐỒNG SỞ GIAO THÔNG VÀ ĐẬU XE TRUNG TÂM OKLAHOMA (COTPA) XIN Ý KIẾN ĐÓNG GÓP CỦA CÔNG CHÚNG VỀ ĐỀ XUẤT THAY ĐỔI DỊCH VỤ CHO CÁC TUYẾN ĐƯỜNG 008 VÀ 009 VÀ VIỆC THỰC HIỆN DỊCH VỤ XE BUÝT NGÀY CHỦ NHẬT

(Journal Record, Black Chronicle, El Nacional và Dân Quyền)

Sở Giao Thông và Đậu Xe Trung Tâm Oklahoma (COTPA) theo đây xin thông báo về một cuộc Điều Trần Công Khai và hai cuộc Họp Cộng Đồng để tiếp nhận các ý kiến về đề xuất thay đổi dịch vụ xe buýt và thay đổi giávớ dự kiến thực hiện từ ngày 27 tháng 01 năm 2019. Các thay đối để xuất bao gồm: Thay đối Tuyến 008 để chạy từ Douglas đến NW 3, sau đó từ NW 3 đến Virginia Ave và tiếp tục chạy

theo tuyến bình thường cho cả hai hướng vào và ra. Tuyến 008 sẽ không phục vụ khu vực Linwood Bìvd nữa.

Thay đổi Tuyến 009 để chạy từ General Pershing đến May, sau đó từ May đến Reno cho cả hai hướng vào và ra. Tuyến 009 sẽ không phục vụ khu vực Villa từ General Pershing đến Reno và khu vực Reno từ Villa đến May nữa.

Bổ sung dịch vụ xe buýt chạy theo lịch thường xuyên vào các ngày Chủ Nhật cho các tuyến 002, 003, 005, 007, 008, 009, 010, 011, 012, 013, 014, 016, 022, 023, 038, 040 và 050.

Bổ sung dịch vụ EMBARK Plus ADA vào ngày Chủ Nhật. Cân cứ ý kiến tham gia thu được từ các cuộc họp và điều trầu, Hội Đồng Quân Trị COTPA sẽ tiến hành các thay đổi này, vào Tháng 12 và việc thực hiện sẽ được áp dụng từ ngày 27 tháng 01 năm 2019. Tất cả các ý kiến đồng góp (bằng lời hoặc văn bản) nhận được trong các cuộc họp và điều trần này sẽ được đưa ra cân nhắc khi đánh giá các đề xuất. Lịch đầy đủ được nêu cụ thể dưới đầy.

Các cuốc Họp Công Đồng

Thứ Ba, ngày 16 tháng 10 năm 2018 – 5:30 chiều Downtown Transit Center – 420 NW 5 St., OKC, OK 73102 Hau hat các tuyến

Thứ Tư; ngày 17 tháng 10 năm 2018 - 5:30 chiều Downtown Transit Center - 420 NW 5 St., OKC, OK 73102 Hầu hết các tuyển

Diều Trần Công Khai

Thứ Sáu, ngày 02 tháng 11 năm 2018 – 9:00 sáng City Hall – 200 N Walker Oklahoma City, OK 73102 Hần hất các tuyến

Nội dung tương tự cũng sẽ được trình bày trong tất cả các cuộc họp.

Quy Trình Tiếp Nhận Ý Kiến

Hội Đồng Quản Trị của COTPA rất mong nhận được ý kiến của công chúng tại các cuộc họp cộng đồng vào ngày điệu trần hoặc gởi văn bản trước. Những người muốn phát biểu tại cuộc Điều Trần Công Khai vui lòng liên hệ trước với EMBARK theo số điện thoại 405-297-1331 để đăng kỷ. Chúng tôi số nhậu đăng kỷ trước cho non ng trước với EMBARA theo so ciện thoại 405-297-1331 để dâng kỳ thước có thể đầng kỳ trước có thể đầng kỳ người không muốn đẳng kỳ trước có thể đầng kỳ ngạy trước khi cuộc điều trần bất đầu và sẽ được xếp phát biểu sau những người đã đẳng kỳ trước. Ngoài ra, các ý kiểu bằng văn bản nhận được vào bất kỳ thời điểm nào trước khi cuộc điều trần bị trì hoặn sẽ trở thành một phân của hỏ sơ điều trần chính thức. Ý kiến bằng văn bản có thể được gửi vào ngày điều trần, email đến địa chỉ embarkok@okc.gov, hoặc gửi trước qua bưu điện đến:

Attn: 2019 Winter Service Changes 2000 S May Ave Oklahoma City, OK 73108

Các cá nhân gửi ý kiến bằng văn bản phải nêu rõ tên, dia chỉ, email, và số điện thoa

Thông báo dành cho Người Khiếm Thính và Khiếm Thị

Nếu quý vị muốn tham dự cuộc điều trắn công khai và cần thông dịch ngôn ngữ ký hiệu, vui lòng thông báo cho EMBARK ít nhất là trước 72 giờ bằng cách gọi đến số *711. Yêu cầu tổng đài gọi số 405-235-7433.

Để Biết Thêm Thông Tin

Truy cập trang web embarkok.com hoặc liên hệ với Bộ Phận Quan Hệ Khách Hàng theo số điện thoại 405-235-7433 để biết thêm thông tin.

An nho vùa làm đẹp vừa có lợi cho sức khỏe

giảm nguy cơ lên cơn đau tim. Ngoài ra, các chất chống oxy hóa trong nhỏ có thể ngăn chặn sự oxy hóa gây ra bởi cholesterol xấu LDL – loại cholesterol gây tắc mạch máu và là yếu tố chính dẫn đến nhiều căn bệnh của hộ thống tuần hoàn.

như it gặp phải các vấn để. về sức khỏe hơn.

Nho vừa là nguồn dinh dường mạnh mẽ, vừa có thể bảo vệ cơ thể chống lại các bức xạ trị liệu. Các bác sĩ khuyên bệnh nhân nên ân nho như một liều thuốc tư

An nho tốt cho thị lực

Nho có thể ngắn chận việc suy giấm thị lực do lão hóa và thoái hóa điểm vàng. Nghiên cứu tiến hành tại Đại học Miami chỉ ra rằng, chố độ ăn nhiều nho có thể hỗ LDL, ít bị xơ vữa động mạch

Vỏ quả nho

Vô của quả nhỏ có khả năng kháng khuẩn. Trong vô quả nhỏ có nhiều chất nho có nhiều chất Resveratrol hơn so với trong thịt quả. Nó có khá năng chống ôxy hóa mạnh gấp 7 lần vitamin B. Vì vậy, khi án nho nên ăn cả vỏ.

Dầu hạt nho

Trong đầu hạt nho có nhiều axit linoleic làm tăng HDL giảm LDL. Dùng đầu hạt nho hàng ngày thì nguy cơ bệnh tim mạch giảm 39 - 56%. Các nhà khoa học Mỹ cho biết khi nam giới có HDL thấp (choiesterol tốt) hay bị chứng bất lực, sau một thời gian dùng dấu hạt nhọ HDI, sa

Chính những củ khoại tây nhỏ bó đã cứu mạng tàu khu trục USS O'Bannon của Hải quân Mỹ thoát khỏi họng

trực USS O'Bannon của Hải quân Mỹ thoát khôi họng sống của kể thủ cũng shư đem đến cho họ cơ hội lật ngược tình thể nguy hiểm.
Ngày 5/4/1943, tàu khu trực Mỹ USS O'Bannon được trang bị dân vũ khi hìng họi bao gồm 17 khẩu pháo phông không, loạt ống phóng ngư lội. võ số sống máy đạn 38 li và bom chìm, những bất ugờ củ khoai tây mới chính là thứ "vũ kh" cứu sống cou thư cũng thủy thủ đoàn khối một vụ chạm trần với thù ngầm Nhật Bầu trên Thái

Bình Dương. Tại thời điểm đó, tàu O'Bannon lớp Fletcher, được đưa vào hoạt động năm 1942, làm nhiệm vụ hỗ trợ trên vùng biển Nam Thái Bình Đương đã hơn một năm. Đểm hôm đy, tàu và thủy thủ đoàn đung trợ về vị trí sau khi hoàn thành sử mộnh oanh tạo gần quần đào Solomon thi phát hiện một tàu ngầm RO-34 của kế địch nổi lân mặt nước.



Tou USS O'Bannon. Anh: Life

Trước sự ngạc nhiên của lính Hải quân Mỹ, thu ngắm Nhật Bản đã hoàn toàn không hay biết về sự hiện diện của con tàu khu trực nặng 2.000 tấn, ngày cả những thủy thủ làm nhiệmsvụ quan sắt song lại ngời gặt ở trên boong tàu - theo lời kổ của thủy thủ Ernest Herr với "Destroyer

Nóng lòng đặp mối họa tiểm tàng trước khi nó có cơ hội

Nóng lòng dập mới họa tiểm tàng tước khi nó có có hội bùng phát, thuyển tướng tàu O'Banuon quyếi định đầm vào tàu ngầm, hy vọng củ đầm sẽ đũ gây hư tại để đánh chim con tàu 1.000 tần của quần dịch. Đổ, là kịch bản khi mọi chuyển trở nêu tối tệ.

"Thuyển tưởng và các sĩ quan khác ở trong phòng điều khiến đã có gắng xác định loại tàu ngắm và kết luận, vào phút cuối, rằng nó có thể là một tàu thá min", ông Herr thuật lại, "Không muốn bị nổ tung cũng với tàu ngầm, quyết định được đưa ra rằng đẩm chim không phái một động thái sống suốt. Vào giấy phát cuối chug, bánh lái đã bị bê ngoặt để tránh va chạm và chúng tôi thấy mình rới vào một tha ngag liện khát giữa lung có theo một thu ngag lầng thất sống tiến thay doc theo một thu ngag mhật Bản".

thấy ming roi vớc một tinh thoại cũng tung sin của tối chạy dọc theo mạn tâu ngắm Nhật Bản". Toán lính Mỹ nhận thấy họ đã tiếp cận quố sát tâu ngắm đốu nối không thể bắn được những với khí tẩm ngấu nhất. Các thủy thủ O'Banhon cũng không mang theo vũ khí cầm tay ở trên boong tâu nên họ có rất ất cơ loại để không chiến, bong hại để bảo vệ chính mình.

hội đe bao vệ chính minh. Khi đó, đá thủy thủ Nhật Bắn, giờ đã hoàn toàn tỉnh táo, bit đầu chạy về hướng những khấu pháo trên boong tầu – trong tầm bắn hoàn hão để gây ra thiệt bại nặng cho con tầu Mỹ. Lính trên tàu O'Bannan lướng cuống

như "gà mắc tóc". Điều cầu làm lúc này là chuyển hưởng sự chủ ý của thủy thủ đoàn Nhật Bản ra xa chỗ các khẩu súng đủ để Ally my addin thist was the tale due that hand all de O'Bannan lấy lại được tâm bầu. Mệnh lệnh này trước

thự gi mà họ có thể ném xuống tàu ngắm. Tinh a siện boong tàu đang chở những thùng lớn chất đây khoai tây boong tàu dang chở những thông lớn chất đây khoại tây nên chúng được chọn làm thứ vũ khi để tự vệ. Khoai bay như mưa xuống tàu ngắm khiến thủy thủ tại đây hoạng mạng tột độ. Bởi lã, trời tối như mực và có thể đô họ còn ngắi ngủ, cộng thêm yếu tố quá mất bình tình nên đã làm các sĩ quan Nhật Bản tường làm khoai tây thànhi lựu dạn. Họ vội vàng nhật "lựu dạn" và quảng chúng xuống biển cũng như nềm trả về phía tàu Mỹ nhanh nhất có thể.

Trận chiến" khoai tây đã đem đến cơ hội đánh lạc hướng đủ để tàu O'Bannon chạy ra xa. Và rồi trận chiến

thực sự bắt đầu. Ở khoảng cách dũ xa để khai hỏa vũ khí, thực sự bất đầu. O không các đủ xã để khất hố và khí, O Baumon đã trật một đợt tấn công vào tàu RO-34. Tâu ngằm bị một vài hư hại nhưng đã kịp thời lận xương nước để tránh nạn, it nhất là trong giấy lất. Tuy nhiên, tàu O Baunon nhanh chống chey đến vòng nước phía trên RO-34 nhằm thả bom chim tấn công. Kết cục, tàu Nhật Bản đã không gấp may mán, toàn bộ 66 người bên trong đều thiệt mạng.















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AVISO DE AUDIENCIA PÚBLICA Y REUNIONES COMUNITARIAS LA AUTORIDAD DE TRANSPORTE Y ESTACIONAMIENTO DE OKLAH CENTRAL (COTPA) SOLICITA LA OPINION PÚBLICA SOBRE LOS CA BIOS DE SERVICIO PROPUESTOS EN LAS RUTAS 008 Y 009 Y LA INI MENTACION DEL SERVICIO DE AUTOBUS LOS DOMINGOS (Journal Record, Black Chronicle, El Nacional y Dan Quyen)

Por este media, la Autoridad de Transporte y Batacionamiento de Oldahoma Cen-terior de Central Oklahoma Transportation and Patrial gathority, COTFA) proportiona formatical el aviso de audiencia pública y dos reuniones comunitarias para recibir comentarios formatical en modificaciones de servicio propuesta y los cambios de tarifas planificados para as unipelementacion el 27 de entero de 2019. Jos cambios propuestos incluyen:

para su implementación el 27 de enero de 2019, Los cambios propuestos incluyen:

Modificar la ruta 0.08 para brindar servicio a Dougha hasta NW 3 y de NW 3 a

Virginia Ave., y continuar el recorrido normal de ida y de vuelta. La ruta 0.08 ya no

brindará servicio a Linwood Blod.

Modificar la ruta 0.09 para brindar servicio a General Penhing hasta May, y de

Maya Reno en el recorrido de ida y de vuelta. La ruta 0.09 ya no brindará servicio a

Villa desde General Penhing a Reno, ni a Reno desde Villa a May.

Agregar un servicio de autobás con horantio regular los domingos para las rutas

0.02, 0.03, 0.05, 0.07, 0.08, 0.09, 0.10, 0.11, 0.12, 0.13, 0.14, 0.16, 0.22, 0.23, 0.38, 0.40 y

0.50.

Agregar el servicio existente EMBARK Plus ADA los domingos.

En función de las opiniones recipidas en las reuniones y en la audiencia, la Junta de Administración de la COTPA se expedirá sobre estos cambios en diciembre y la im-plementación tendria lugar el 27 de entreo de 2019. Se tendrán en cuenta todos los comentarios (orales o escribó) recipidos durante estos eventos cuando se evalúen las propuestas. A continuación se detalla el programa completo.

oppendas, Acontinuación se cerana e programa compieto.

Reuniones comunitarias

Martes 16 de octubre de 2018 – 5:30 p. m. Centro de Tránsito del Centro –
420 NW 5 St., OKC, OK 73102 · La mayoría de las rutas

Miércoles 17 de octubre de 2018 – 5:30 p. m. Centro de Tránsito del Centro –
420 NW 5 St., OKC, OK 73102 · La mayoría de las rutas

Audiencia pública

Audiencia pobbica

Viernes 2 de noviembre de 2018 – 9:00 a. m. Ayuntamiento –
200 N Walker Oklahoma Ciry, CK 73102 - la mayoria de las rutas
En todas las reuniones se presentará el mismo contenido.
Proceso para recibir comentarios
La Junta de Administración de la COTPA alienta los comentarios del público en las reuniones comunitarias, en la fecha de la audiencia pública o por escrito con anticipación. Las personas que deseen hacer uso de la pulabra en la unidiencia pública deben comunicarse con BMBARK 405-297-1331 para inacribires. Se aceptará la inscripción anticipada hasta bas 4:00 p. m. del dia anteriora a la audiencia. Los que no se hayan inscrito con anticipada hasta bas 4:00 p. m. del dia anteriora a la audiencia. Los que no se hayan inscrito con anticipación. Ademia, los comentarios por escrito recibidos en cualquier momento antes del cierter de la audiencia formarán parte del registro oficial de la audiencia, se contentarios por escrito pueden presentarse el día de la audiencia, enviarse por correo electrónico a embarko-62 de, govo enviarse por correo postal por anticipado a: EMBARK

EMBARK Attn: 2019 Winter Service Changes 2000 S May Ave., Oldahoma City, OK 73108

erionas que envien comentarios por escrito deben incluir su nombre, dirección, o electrónico y número de teléfono.

Aviso para personas con deficiencias visuales y auditivas Si desea asistir a la audiencia pública y necesita interpretación en letiguaje de señas, notifique a EMBARK al menos con 72 horas de anticipación llamando al '711, Pidale al operador que llame al 405-235-7433;

Si desea obtener la información en otro idioma, llame al 405-235-7433.

eáu quyù vò caàn thoâng tin baèng ngoân ngöō khaùc, xin lieân laïc 405-235-743 如您需要其他语言版本的信息,请致电 405-235-7433。

AVISO DE AUDIENCIA PÚBLICA Y REUNIONES COMUNITARIAS
LA AUTORIDAD DE TRANSPORTE Y ESTACIONAMIENTO DE OKLAHOMA
CENTRAL (COTPA) SOLICITA LA OPINIÓN PUBLICA SOBRE LOS CAMBIOS DE SERVICIO PROPUESTOS EN LAS RUTAS 608 Y 909 Y LA IMPLEMENTACIÓN DEL SERVICIO DE AUTOBÚS LOS DOMINGOS

MENTACIÓN DEL SERVICIO DE AUTOBÚS LOS DOMINGOS

MENTACION DEL SENCICIO DE AUTORIS LOS DOMINGOS (Journal Record, Black Chronicle, El Nacional y Dan Quyen) For este medio, la Autoridad de Transporte y Estacionamiento de Oblahorna Cen-ral (Central Oldahoma Transportation and Patrido, Autority, COTPA) proporedona el aviso de audiencia pública y dos reuniones comunitarias para recibir comentarios sobre has modificaciones de servido propuestas y los cambios de tarifas planificados para su implementación el 27 de enero de 2019, Los cambios propuestos incluyen:

- Modificar la ruta 0.08 para brindar servicio a Douglas hasta NW 3 y de NW 3 a Virginia Ave., y continuar el recorrido normal de sid y de vuelta. La ruta 0.08 ya no brindará servicio a Limvod Bivd.
 Modificar la ruta 0.09 para brindar servicio a General Pevahing hasta May, y de May a Reno en el recorrido de ida y de vuelta. La ruta 0.09 ya no brindará servicio a Wila desde General Pershing a Reno, ni a Reno desde Villa a May.
 Agregar un servicio de autobis con horantir regular los domingos para las rutas 0.07, 003, 005, 007, 008, 009, 010, 011, 012, 013, 014, 016, 022, 023, 038, 040 y 050.
- Agregar el servicio existente EMBARK Plus ADA los domingos

- Agregar el servicio existente EMSARK Plus ADA los domingos.

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n'unición de las opiniones recibidas en las reuniones y en la audiencia, la Junta de
diministración de la COTPA se expedira sobre estos cambios en diciembre y la imfementación tendria lugar el 27 de enero de 2019. Se tendrán en cuenta todos los
smentarios (orades o escritos) recibidos dimante estos eventos cuando se evalúten las
ropuestas. A continuación se detalla el programa completo.

Martes 16 de octubre de 2018 – 5:30 p. m. Centro de Tránsito del Centro 420 NW 55 c., OKC, OK 73102 - La mayoria de las rutas
Miércoles 17 de octubre de 2018 – 5:30 p. m. Centro de Tránsito del Centro 420 NW 55 c., OKC, OK 73102 - La mayoria de las rutas
Miércoles 17 de octubre de 2018 – 5:30 p. m. Ayuntamiento 200 N Walker Oklahoma Civ, OK 73102 - La mayoria de las rutas
En todas las reuniones se presentará el mismo contenido.

Proceso para recelhir comentarios

1 Junta de Administración de la COTPA allenta los comentarios del público en las

La Jonta de Administración de la COTPA alienta los comentarios del público en las reuniones comunitarias, en la fecha de la audiencia pública o por escrito con anticipación. Las personas que descen hacer uso de la palabra en la audiencia pública deben comunitarias con ENMARX 405 297-1331 para instrubirae. Se aceptará la inscripción anticipada hasta las 450 p. m. del dia antierior a la audiencia. Los que no se hayan inscrito con anticipación pueden anotarse inmediatamente antes de que comience la audiencia a podrán sopresar su opitión después de las personas que se hayan inscrito on anticipación. Además, los comentarios por escrito recibidos en cualqueir momento antes del vierre de la audiencia fortuario; parte del rejetivo oficial de la audiencia con carriedo de la audiencia en viviarse por correo electrónico a embasticolego/cgoy o enviarse por correo postal por anticipado a EMARK

BMBARK
Attn: 2019 Winter Service Changes
2000 S May Ave., Oklahoma City, OK 73108

as penonas que envien comentarios por escrito deben incluir su nombre, dirección orreo electrónico y número de telefono.

Aviso para personas con deficiencias visuales y auditivas Si desea asistir a la audiancia pública y necesita interpretación en lenguaje de señas, notifique a EMBARK al menor con 72 horas de articipación llamando al *711. Pidale al operador que llame al 405-235-7433.

Para obtener más información, visite embarkok com o comuniquese con Relacione con el cliente al 405-235-7433.

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Neáu quyú vô caân thoàng tin baèng ngoàn ngoò khaŭc, xin lieán laic 405-235-7433. 如您需要其他语言版本的信息,请致电 405-235-7433.







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NOTICE OF HEARINGS

10/10/2018

10/17/2018

PROPOSED SERVICE CHANGES ON RTS 008 AND 009; THE IMPLEMENTATION OF SUNDAY BUS SVC

LEGAL NOTICE

STATE OF OKLAHOMA

COUNTY OF OKLAHOMA

s.s

I, of lawful age, being duly sworn, am a legal representative of The Journal Record of Oklahoma City, Oklahoma, a daily newspaper of general circulation in Oklahoma County, Oklahoma, printed in the English Language and published in the City of Oklahoma City, in Oklahoma County, State of Oklahoma, continuously and uninterruptedly published in the County for a period of more than 104 consecutive weeks prior to the first publication of the attached notice, and having a paid general subscription circulation therein and with admission to the United States mails as paid second-class mail matter.

That said notice a true copy of which is attached hereto, was published in the regular edition of said newspaper during the period and time of publication and not in a supplement on the ABOVE LISTED DATE(S).

Subscribed and sworn before me this 17th day of October, 2018

MaRanda Beeson, Notary Public OF ON THE PROPERTY OF THE PROPER

Comission Number:

10001243

My Comission Expires:

02/18/2022

Order Number

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Page 1 of 2

(MS11632935)

NOTICE OF PUBLIC HEARING & COMMUNITY MEETINGS
CENTRAL OKLAHOMA TRANS-PORTATON AND PARKING AUTHORITY (COTPA)
SEEKS PUBLIC INPUT ON PROPOSE D SERVICE CHANGES ON ROUTES 008 AND 009
AND THE IMPLEMENTATION OF SUNDAY BUS SERVICE

(Journal Record, Black Chronicle, El Nacional and Dan Quyen)

The Central Oklahoma Transportation and Parking Authority (COTPA) hereby provides notice of a Public Hearing and two Community Meetings in order to receive comments on proposed bus service modifications and fire changes planned for implementation January 27, 2019. Proposed changes include:

- Modifying Route 008 to serve Douglas to NW 3 then from NW 3 to Virginia Ave and continue its normal route for both inbound and outbound directions. Route 008 will no longer serve Linwood Blvd.
- Modifying Route 009 to serve General Pershing to May then May to Reno for both inbound and outbound directions. Route 009 will no longer serve Villa from General Pershing to Reno or Reno from Villa to May.
- Adding regularly scheduled bus service on Sundays for routes 002, 003, 005, 007, 008, 009, 010, 011, 012, 013, 014, 016, 022, 023, 038, 040, and 050.
- Adding existing EMBARK Plus ADA service on Sunday.

Based on input gathered at the meetings and hearing, the COTPA Board of Trustees will act on these changes in December and implementation would occur on January 27, 2019. All comments (written or oral) received during these events will be considered when evaluating the proposals. The full schedule is listed below.

Community Meetings

Tuesday, October 16, 2018 - 5:30 p.m.

Downtown Transit Center - 420 NW 5 St., OKC, OK 73102

Most Routes

Wednesday, October 17, 2018 - 5:30 p.m

Downtown Transit Center - 420 NW 5 St., OKC, OK 73102

Most Routes

Public Hearing

Friday, November 2, 2018 - 9 a.m. City Hall - 200 N Walker Oklahoma

City, OK 73102

Most Routes

The same content will be presented at all meetings.

Process for Receiving Comments

The COTPA Board of Trustees encourages public comments at community meetings, on the date of the public hearing or in writing beforehand. Those desiring to speak at the Public Hearing contact EMBARK 405-297-1331 to register. Advance registration will be accepted until 4 p.m. on the day prior to the hearing. Those who have not pre-registered may sign up immediately before the hearing begins and will be scheduled to speak after those who have pre-registered. In addition, written comments received any time before the hearing is adjourned will become a part of the official hearing record. Written comments may be submitted on the date of the hearing, emailed to embarkok@okc.gov, or mailed in advance to:

EMBARK

Attn: 2019 Winter Service Changes 2000 \$ May Ave

Oklahoma City, OK 73108

Individuals submitting written comments must include their name, address, email, and phone number.

Notice for the Hearing and Visually

If you wish to attend the public hearing and need sign language interpretation, please notify EMBARK at least 72 hours in advance by calling *711. Ask the operator to call 405-235-7433.

For Additional Information

Visit embarkok.com or contact Customer Relations at 405-235-7433 for more information (10-10, 10-17-18)

(10-10, 10-17-18)

Journal Record Publishing Company

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PUBLISHER'S AFFIDAVIT

NOTICE OF HEARINGS

10/10/2018 10/17/2018

PROPOSED SERVICE CHANGES ON RTS 008 AND 009; THE IMPLEMENTATION OF SUNDAY BUS SVC

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Terri VanHooser, Business Manager

Subscribed and sworn before me this 17th day of October, 2018

MaRanda Beeson, Notary Public OF OKLANDA

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SEEKS PUBLIC INPUT ON PROPOSED SERVICE CHANGES ON ROUTES 008 AND 009
AND THE IMPLEMENTATION OF SUNDAY BUS SERVICE

(Journal Record, Black Chronicle, El Nacional and Dan Quyen)

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- Modifying Route 008 to serve Douglas to NW 3 then from NW 3 to Virginia Ave and continue its normal route for both inbound and outbound directions. Route 008 will no longer serve Linwood Blvd.
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- Adding regularly scheduled bus service on Sundays for routes 002, 003, 005, 007, 008, 009, 010, 011, 012, 013, 014, 016, 022, 023, 038, 040, and 050
- Adding existing EMBARK Plus ADA service on Sunday.

Based on input gathered at the meetings and hearing, the COTPA Board of Trustees will act on these changes in December and implementation would occur on January 27, 2019. All comments (written or oral) received during these events will be considered when evaluating the proposals. The full schedule is listed below.

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Friday, November 2, 2018 - 9 a.m.

City Hall - 200 N Walker Oklahoma City, OK 73102

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For Additional Information

Visit embarkok.com or contact Customer Relations at 405-235-7433 for more information (10-10, 10-17-18)

(10-10, 10-17-18)

APPENDIX B Meeting Materials



PUBLIC NOTICE

The Central Oklahoma Transportation and Parking Authority (COTPA) hereby provides notice of a Public Hearing and two Community Meetings in order to receive comments on proposed bus route modifications and the addition of Sunday service planned for implementation January 27, 2019.

Based on input gathered at the meetings and hearing, the COTPA Board of Trustees will act on these changes in November and implementation would occur starting January 27, 2019.

Community Meeting Schedule

Tuesday, October 16, 2018 – 5:30 p.m. Downtown Transit Center – 420 NW 5 St. Most Routes

Wednesday, October 17, 2018 – 5:30 p.m. Downtown Transit Center – 420 NW 5 St. Most Routes

Public Hearing

Friday, November 2, 2018 – 9 a.m. City Hall – 200 N Walker Most Routes



HOW TO SUBMIT OFFICIAL COMMENTS

The COTPA Board of Trustees encourages public comments at community meetings, in writing before the hearing or on the date of the public hearing.

All written comments should include name, address, email and phone number.

Written comments may be submitted on the date of the hearing, emailed to embarkok@okc.gov, or mailed in advance to:

EMBARK Attn: 2019 Winter Service Changes 2000 S May Ave Oklahoma City, OK 73108



SUMMARY OF SERVICE CHANGES

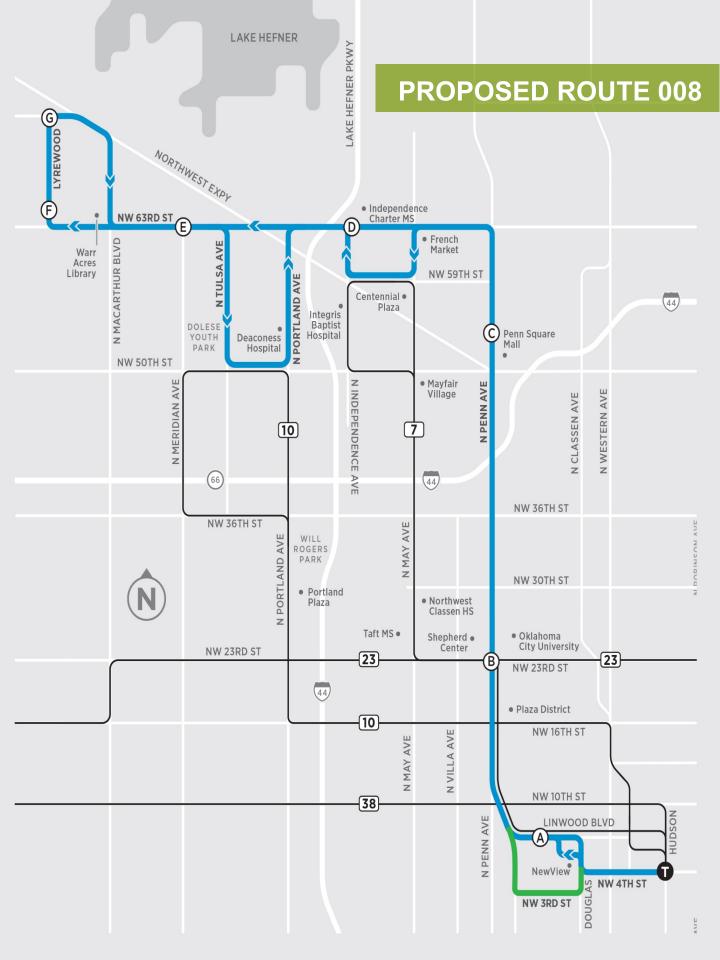
Route 008 Changes

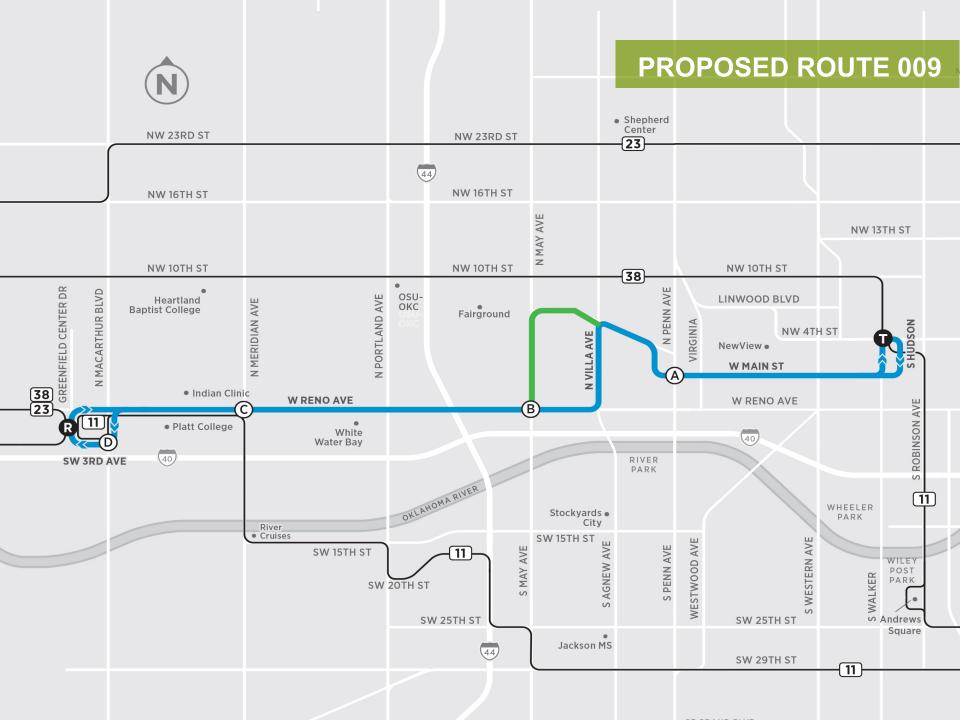
Modifying Route 008 to serve Douglas to NW 3 then from NW 3 to Virginia Ave and continue its normal route for both inbound and outbound directions. Route 008 will no longer serve Linwood Blvd.

Route 009 Changes

Modifying Route 009 to serve General Pershing to May then May to Reno for both inbound and outbound directions. Route 009 will no longer serve Villa from General Pershing to Reno or Reno from Villa to May.







SUMMARY OF SERVICE CHANGES

Sunday Bus Service

Adding regularly scheduled bus service on Sundays for routes 002, 003, 005, 007, 008, 009, 010, 011, 012, 013, 014, 016, 022, 023, 038, 040, and CIRC and existing EMBARK Plus ADA service.

City Council approved funding for this in May 2018.

If service addition is approved, it will be implemented on January 27, 2019







127 Square Miles of Service



003 N Kelley

005 Memorial Rd

007 N May

008 N Penn/NW 63rd

009 WR eno Crosstown

010 N Portland

011 29th St Crosstown

012 S May

013 S Western/I-240 Crosstown

014 SE Bryant/Sunnylane

016 S Penn

022 Martin Luther King

023 23rd St Crosstown

038 10th St Crosstown

040 S Walker

CIRC Downtown Circulator





Official Comment

Please use the space below to write your comment regarding the proposed 2019 Winter Service Changes

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^{*} Note that all community meetings and public hearings may be recorded or photographed and all official comments & sign in sheets are subject to open record requests.

APPENDIX C Sign-In Sheets

PUBLIC MEETING

Project: 2019 Winter Service Changes Meeting Date: 10/16/2018, 5:30 pm (2.05 pm)

Facilitator: EMBARK Place/Room: Downtown Transit Center

Name	Organization	E-Mail
Michael Senson	FMBARK	
Michael Sanzane Chip 1007 Jason Ferbrache	EMBARK EMBARK EMBARK	
- NOGY	EMUANA	
Jason Ferbrache	EMBARK	

PUBLIC MEETING

Project:

2019 Winter Service Changes

Meeting Date:

10/17/2018, 5:30 pm

6:050

Facilitator:

EMBARK

Place/Room:

Downtown Transit Center

Name	Organization	E-Mail
Ophelia French		ophel. afrench@14ayahoo.com
TARA MART		ophel.afrenche14ayahoron
Ophelia French TARA MART Chip Volen Laura Vacek Michael 840	EMBARK	
1 NOIET	•	
Laura Vacek	EMBARY	ur tegraffit, email, com
Michael 849	EMBARK	

APPENDIX D Public Comments Received as of 12/06/18



Public Engagement SUMMARY REPORT

Proposed Summer 2018 Service and Fare Changes

Community Meetings held on:

Thursday, March 8, 2018	Noon – 1 pm	Almonte Library
Saturday, March 10, 2018	9:30 – 10:30 am	Transit Center
Monday, March 12, 2018	Noon – 1 pm	Ralph Ellison Library
Wednesday, March 14, 2018	5:30 – 6:30 pm	Capitol Hill Library
Tuesday, March 19, 2018	5:30 – 6:30 pm	Warr Acres Library

Public Hearing held on:

Friday, April 6, 2018 9 am City Council Chambers

April 30, 2018

Michael Scroggins | Manager of Marketing, Customer Relations, and Technology Chip Nolen | Manager of Scheduling and Short Range Planning

The content of this report is draft material, specific to project development for proposed bus service modifications and fare changes and does not necessarily reflect the official view or policies of COTPA or FTA at the time of publication. This report does not constitute a contract, standard, or specification, or regulation.

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I. IN	TRODUCTION	. 3
	Background	
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	Notification Efforts	
	Community Meetings	
	Public Hearing Attendance and Comments	
	PPENDICES	

I. INTRODUCTION

Central Oklahoma Transportation and Parking Authority (COTPA), operating as EMBARK, held five community meetings regarding various proposed bus and fare changes. The purpose of the public engagement process was to update the public on current status of the project, communicate the proposed implementation schedule and hearing date, and receive comments and feedback on the proposed changes. Additionally, the meetings served as an opportunity for public feedback and comment leading up to the formal hearing on April 6, 2018 during the EMBARK board meeting.

A. Background

EMBARK staff initiated a fare study in the summer of 2017 with the help of a consultant – Four Nines Technologies. The goal was to review EMBARK's current and future transportation modes and fare practices to establish a fare policy that supports EMBARK's mission and evaluate the current fare structure.

Additionally, staff proposed two service changes in conjunction with the fare recommendations. Savings created through operational efficiencies, positioned EMBARK to extend route 022 until midnight on weekdays. Route 050 would be re-routed to prevent duplicative services and work in tandem with the upcoming OKC Streetcar service.

Results and recommendations of that study, including best practices from peer agencies, resulted in the following proposals to be discussed at the meetings:

- Qualification for reduced fare benefits, based on age, would increase to age 65 from age 60. The age requirement only applies to new applications dated July 29, 2018 or later. Customers already qualified and carrying an EMBARK Reduced Fare Benefit card would continue to receive the benefit.
- Eliminate the issuance of fare change cards from fare boxes on fixed-route buses.
- Establish all existing fixed-route bus passes as universal passes. Universal passes grant its holder access to both fixed-route bus and streetcar services.

- Establish an Universal Annual Pass for \$600.00.
- Establish a downtown circulator fare schedule for Route 050 and Streetcar only services as:

Single Trip Fare * \$1.00 per boarding

Day Pass* \$3.00 Monthly Pass* \$32.00 Annual Pass* \$384.00

- Route 050 Service re-route and schedule modification
- Add week night service hours to Route 022. Hourly (60 minute) service would be provided from 7 pm to Midnight.

II. PUBLIC ENGAGEMENT

A. Notification Efforts

Public meeting notifications were posted across multiple media platforms, in English, Spanish and Vietnamese. The public was notified by newspaper, rider alerts, on board notices, and social media channels (embarkok.com, Twitter, and Facebook). Appendix A contains copies of meeting notices and publications which included:

- Advertisements in the Journal Record, Black Chronicle, and El Nacional de Oklahoma news print
- Emails were sent to existing ADA customers
- Social Media notifications via Twitter and Facebook
- Notices via embarkok.com

EMBARK spent \$860.09 to ensure the meetings were promoted.

B. Community Meetings

Five community meetings were held. The times, locations and attendance for each community meeting is as follows:

Thurs, March 8, 2018 | Noon – 1 pm | Almonte Library | 1 attendee Sat, March 10, 2018 | 9:30 – 10:30 am | Transit Center | 16 attendees

^{*}Standard Reduced Fare Benefits Apply

Mon, March 12, 2018 | Noon – 1 pm | Ralph Ellison Library | 3 attendees Wed, March 14, 2018 | 5:30-6:30 pm | Capitol Hill Library | 4 attendees Tue, March 19, 2018 | 5:30-6:30 pm | Warr Acres Library | 4 attendees

The format for each community meeting was intended to be identical. It was planned that staff would give a brief presentation followed by a question and answer session. Sign-in sheets, handouts, and maps were available at each session.

The format of the hearing was intended to be like the community meetings. Staff gave a brief presentation, provided an update on the five community meetings previously held, and concluded with an opportunity for the Board to hear comments and feedback regarding the proposed changes. Sign-in sheets, handouts, and maps were available at each session.

C. Public Hearing Attendance and Comments

Meeting: Public Hearing

Date: Friday, April 6, 2018

Time: 9 AM

Location: Oklahoma City Council Chamber, downtown Oklahoma City

Citizens in attendance: 3

A public hearing was held Friday, April 6, 2018 at 9 am in the City Council Chambers of City Hall located at 200 N Walker Ave, Oklahoma City, 73102. The hearing was a part of the COTPA Board Meeting. Three residents were in attendance and two addressed the COTPA Board of Trustees.

Comments: The public hearing was held during the monthly COTPA board meeting, which is also broadcast on Oklahoma City's local TV channel. Two residents chose to provide feedback to the board. The first resident spoke in favor of extending route 022 till midnight. He also requested COTPA investigate serving the Greyhound facility, located on

Reno and MLK Ave. The second resident also spoke in favor of extending route 022 until midnight.

III. APPENDICES

Appendix A. Meeting Notifications

Appendix B. Meeting Materials

Appendix C. Sign-In Sheets and Community Meeting Notes

Appendix D. Public Comments Received as of 04/26/18

APPENDIX A Meeting Notifications

NOTICE OF PUBLIC HEARING & COMMUNITY MEETINGS CENTRAL OKLAHOMA TRANSPORTATON AND PARKING AUTHORITY SEEKS PUBLIC INPUT ON PROPOSED FARE AND SERVICE CHANGES

(Journal Record, Black Chronicle, and El Nacional)

The Central Oklahoma Transportation and Parking Authority (COTPA) hereby provides notice of a Public Hearing and five Community Meetings in order to receive comments on proposed bus service modifications and fare changes planned for implementation July 29, 2018. Proposed changes include:

- Qualification for reduced fare benefits, based on age, will increase to age 65 from age 60. The
 age requirement only applies to new applications dated July 29, 2018 or later. Customers already
 carrying an EMBARK Reduced Fare Benefit card will continue to receive the benefit.
- Eliminate the issuance of fare change cards from fare boxes from fixed-route buses.
- Establish all existing fixed-route bus passes as universal passes. Universal passes grant its holder access to both fixed-route bus and streetcar services.
- Establish an Universal Annual Pass for \$600.00.
- Establish a downtown circulator fare schedule for Route 050 and Streetcar only services as:

Single Trip Fare* \$1.00 per boarding

Day Pass* \$3.00 Monthly Pass* \$32.00 Annual Pass* \$384.00

*Standard Reduced Fare Benefits Apply

- Route 050 Service
- Add week night service hours to Route 022. Hourly (60 minute) service would be provided from 7
 pm to Midnight.

Based on input gathered at the meetings and hearing, the COTPA Board of Trustees will act on these changes in May and implementation would occur on July 29, 2018. All comments (written or oral) received during these events will be considered when evaluating the proposals. The full schedule is listed below.

Community Meetings

Thursday, March 8, 2018 – 12 p.m.

Almonte Library – 2914 SW 59 St, Oklahoma City, OK 73119 Route 012

Saturday, March 10, 2018 - 9:30 a.m.

Downtown Transit Center – 420 NW 5 St., OKC, OK 73102 Most Routes

Monday, March 12, 2018 – 12 p.m.

Ralph Ellison Library – 2000 NE 23 St, Oklahoma City, OK 73111 Routes 002 and 022

Wednesday, March 14, 2018 - 5:30 p.m.

Capitol Hill Library – 327 SW 27 St, Oklahoma City, OK 73109 Routes 013 and 040

Monday, March 19, 2018 - 5:30 p.m.

Warr Acres Library – 5901 NW 63 St, Warr Acres, OK 73132 Route 008

Public Hearing

Friday, April 6, 2018 – 9 a.m. City Hall – 200 N Walker Oklahoma City, OK 73102 Most Routes

The same content will be presented at all meetings.

Process for Receiving Comments

The COTPA Board of Trustees encourages public comments at community meetings, on the date of the public hearing or in writing beforehand. Those desiring to speak at the Public Hearing should contact EMBARK 405-297-1331 to register. Advance registration will be accepted until 4 p.m. on the day prior to the hearing. Those who have not pre-registered may sign up immediately before the hearing begins and will be scheduled to speak after those who have pre-registered. In addition, written comments received any time before the hearing is adjourned will become a part of the official hearing record. Written comments may be submitted on the date of the hearing, emailed to embarkok@okc.gov, or mailed in advance to:

EMBARK

Attn: 2018 Fare & Service Changes 2000 S May Ave Oklahoma City, OK 73108

Individuals submitting written comments must include their name, address, email, and phone number.

Notice for the Hearing and Visually Impaired

If you wish to attend the public hearing and need sign language interpretation, please notify EMBARK at least 72 hours in advance by calling *711. Ask the operator to call 405-235-7433.

For Additional Information

Visit embarkok.com or contact Customer Relations at 405-235-7433 for more information.

Si desea obtener la información en otro idioma, llame al 405-235-7433.

Neáu quyù vò caàn thoâng tin baèng ngoân ngõõ khaùc, xin lieân laïc 405-235-7433.

如您需要其他语言版本的信息,请致电 405-235-7433.

The Black Chroniele

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1415 NW 43rd, OKC, OK 73118

405-213-1888

VanceTheCreditDoctor.com

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Faulity Assistant, Grounds Maintenance, Line Cook (above positions located at Rockwell Campus)
Facility Assistant - Edmund location (BIC)

For extended job description and to complete online Only candidates of interest will be contacted. EOE

Classified Deadline Is Fridays At 1 p.m.!

OKLAHOMA ALCOHOLIC BEVERAGE LAWS ENFORCEMENT COMMISSION NOTICE OF INTENTION TO APPLY

FOR AN ALCOHOLIC BEVERAGE LICENSE

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Dated this 21 "day of February, 2018

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(My countrission expires) 3/78/2020 (Notary Public)

The Black Chronicle

Advertising Deadline, Tuesdays at 1 p.m.! An additional 40 cents per word is charged for ads over 41 words.

NOTICE OF PUBLIC HEARING & COMMUNITY MEETINGS CENTRAL OKLAHOMA TRANSPORTATION AND PARKING AUTHORITY SEEKS PUBLIC INPUT ON PROPOSED FARE AND SERVICE CHANGES

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OKLAHOMA ALCOHOLIC BEVERAGE LAWS ENFORCEMENT COMMISSION NOTICE OF INTENTION TO APPLY FOR AN ALCOHOLIC BEVERAGE LICENSE

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The Black Chronicle

Advertising Deadline, Tuesdays at 1 p.m.!

An additional 40 cents per word is charged for ads over 41 words.

NOTICE OF PUBLIC HEARING & **COMMUNITY MEETINGS** CENTRAL OKLAHOMA TRANSPORTATON AND PARKING AUTHORITY SEEKS PUBLIC INPU' ON PROPOSED FARE AND SERVICE CHANGES

(Journal Record, Block Chronicle, El Nacional and Dan Quyen)

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Based on input guidered at the meetings and hearing, the COTEA Beam of Trusters wild act on these changes in May and implementation would occur on July 29, 2018. All comments (written or only) reserved during these sends with the considered often evaluating the proputation of the fill wheelet is Issued below.

Community Meetings

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Saturday, Mayoth 10, 2018 – 9:30 a ns Deventoring Transis Corpor – 420 NW 3 St , DKC, DK 73102 Mast Routes

Monday, March 12, 2018 – 12 p.m. Ralph Ellison Library – 1006 NE 23rd St, Oklali eme City, OK 731(1) Routes 002 and 022

Wednesday, March 14, 2013—5:30 p.rs. Caphol Hill Library — 327 SW 27th St, Oklahorsa City, OK 73/09 Routes 813 and 840 Tuneday, Merch 19, 2018 – 5.30 p.m. Warr Acres Library – 3901 NW 63rd St, Warr Acres, OK 73132 Rose 005

Publia Lispaine Friday, April 6, 2318 – 9 a m City Hull – 200 North Waller Oklahorra City, OK 73102 Moss Reutes

The same content will be presented at all meetings

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For Additional inflamation
Visit embarket corn or contect Customer Relations at 405 235-7433

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405-235-7433.

NOTIFICACIÓN DE AUDIENCIA PÚBLICA Y REUNIONES COMU-NITARIAS AUTORIDAD CENTRAL DE TRANSPORTE Y ESTACIONA-MIENTO DE OKLAHOMA SOLICITA LA OPINIÓN PÚBLICA SOBRE CAMBIOS PROPUESTOS EN SERVICIOS Y TARIFAS

CAMBIOS PROPUESTOS EN SERVICIOS Y TARIFAS

(Journal Record, Black Chronicle, El Nacional y Dan Quyen)

La Autoridad Central de Transporte y Bastafonamiente de Oklahomu (Central
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Journal Record Publishing Company

101 N Robinson Suite 101 Oklahoma City, OK 73102

PUBLISHER'S AFFIDAVIT

PUBLIC HEARINGS

03/09/2018

03/16/2018

PROPOSED MODIFICATIONS TO BUS SERVICE AND FARES

NUMBER

PUBLICATION DATES

LEGAL NOTICE

STATE OF OKLAHOMA

COUNTY OF OKLAHOMA

S.S

I, of lawful age, being duly sworn, am a legal representative of The Journal Record of Oklahoma City, Oklahoma, a daily newspaper of general circulation in Oklahoma County, Oklahoma, printed in the English Language and published in the City of Oklahoma City, In Oklahoma County, State of Oklahoma, continuously and uninterruptedly published in the County for a period of more than 104 consecutive weeks prior to the first publication of the attached notice, and having a paid general subscription circulation therein and with admission to the United States mails as paid second-class mail matter.

That said notice a true copy of which is attached hereto, was published in the regular edition of said newspaper during the period and time of publication and not in a supplement on the ABOVE LISTED DATE(S).

Terri VanHooser, Business Manager

Subscribed and sworn before me this 16th day of March, 2018

MaRanda Beeson, Notary Public OF OK

Comission Number:

10001243

My Comission Expires:

2/18/2018

Order Number

Publisher's Fee

11514467

\$ 232.27

Page 1 of 2

(MS11514467)

NOTICE OF PUBLICHEARING & COMMUNITY MEETINGS CENTRAL OKLAHOMA TRANSPORTATION AND PARKING AUTHORITY SEEKS PUBLIC INPUT ON PROPOSED FARE AND

SERVICE CHANGES
The Central Oklahona
Transportation and Parking Authority
(COTPA) hereby provides notice of a
Public Hearing and five Community
Meetings in order to receive comments
on proposed bus service modifications
and fare changes planned for implementation July 29, 2018. Proposed changes
include:

- Qualification for reduced fare benefits, based on age, will increase to age 65 from age 60. The age requirement only applies to new applications dated July 29, 2018 or later Customers already carrying an EMBARK Reduced Fare Benefit eard will continue to receive the benefit.
- Eliminate the issuance of fare change eards from fare boxes from fixed-route buses.
- Establish all existing fixed-route bus passes as universal passes. Universal passes grantits holder access to both fixed-route bus and streetear services.
- Establish an Universal Annual Pass for \$600.00.
- Establish a downtown circulator fare schedule for Route 050 and Streetcar only services as:

Single Trip Fare* \$1.00 per boarding Day Pass*\$3.00

Monthly Pass * \$32.00

Annual Pass* \$384.00

*Standard Reduced Fare Benefits Apply

• Route 050 Service

 Add week night service hours to Route 022. Hourly (60 minute) service would be provided from 7 pm to Midnight

Based on input gathered at the meetings and hearing, the COTPA Board of Trustees will act on these changes in May and implementation would occur on July 29, 2018. All comments (written or oral) received during these events will be considered when evaluating the proposals. The full schedule is listed below.

Community Meetings

Thursday, March 8, 2018 - 12 p.m. Almonte Library - 2914 SW 59 St, Oklahom City, OK 73119

Route 012

Saturday, March 10, 2018 - 9:30 a.m.

Downtown Transit Center - 420 NW 5 St., OKC, OK 73 102

Most Routes

Monday, March 12, 2018 - 12 p.m. Ralph Ellison Library - 2000 NE 23 St, Oklahoma City, OK 73111 Routes 002 and 022 Wednesday, March 14, 2018 - 5:30 Capitol Hill Library - 327 SW 27 St. Oklahona City, OK 73109 Routes 013 and 040 Monday, March 19, 2018 - 5:30 Warr Acres Library - 5901 NW 63 St, Warr Acres, OK 73132 Route 008 Public Hearing Friday, April 6, 2018 - 9 a.m. City Hall - 200 N Walker Oklahonn City, OK 73102 Most Routes The same content will be presented at all meetings.

Process for Receiving Comments The COTPA Board of Trustees encourages public comments at community meetings, on the date of the public hearing or in writing beforehand. Those desiring to speak at the Public Hearing should contact EMBARK should contact EMBARK 405-297-1331 to register. Advance registration will be accepted until 4 p.m. on the day prior to the hearing. Those who have not pre-registered may sign up immediately before the hearing begins and will be scheduled to speak after those who have pre-registered. In addition, written comments received any time before the hearing is adjourned will become a part of the official hearing record. Written comments may be submitted on the date of the hearing. emailed to embarkok@oke.gov, or milled in advance to:

EMBARK
Attn: 2018 Fare & Service Changes
2000 S May Ave
Oklahom City, OK 73108
Individuals submitting written
comments must include their name,
address, email, and phone number.

Notice for the Henring and Visually Impaired

If you wish to attend the public hearing and need sign language interpretation, please notify EMBARK at least 72 hours in advance by calling *711. Ask the operator to call 405-235-7433.

For Additional Information

Visit embarkok.com or contact Customer Relations at 405-235-7433 for more information.

(3-9, 3-16-18)

Journal Record Publishing Company

101 N Robinson Suite 101 Oklahoma City, OK 73102

PUBLISHER'S AFFIDAVIT

PUBLIC HEARINGS

03/09/2018 03/16/2018

PROPOSED MODIFICATIONS TO BUS SERVICE AND FARES

NUMBER

PUBLICATION DATES

LEGAL NOTICE

STATE OF OKLAHOMA

S.S

COUNTY OF OKLAHOMA

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Page 1 of 2

(MS11514467)
NOTICE OF PUBLICHEARING &
COMMUNITY MEETINGS
CENTRAL OKLAHOMA TRANSPORTATON AND PARKING
AUTHORITY SEEKS PUBLIC
INPUT ON PROPOSED FARE AND
SERVICE CHANGES

The Central Oklahoma Transportation and Parking Authority (COTPA) hereby provides notice of a Public Hearing and five Community Meetings in order to receive comments on proposed bus service modifications and fare changes planned for implementation July 29, 2018. Proposed changes include:

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- Eliminate the issuance of fare change cards from fare boxes from fixed-route buses.
- Establish all existing fixed-route bus passes as universal passes.
 Universal passes grantits holder access to both fixed-route bus and streetear services.
- Establish an Universal Annual Pass for \$600,00.
- Establish a downtown circulator fare schedule for Route 050 and Streetear only services as:

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Monthly Pass*\$32.00

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*Standard Reduced Fare Benefits

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Community Meetings

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Route 012

Saturday, March 10, 2018 - 9:30

Downtown Transit Center - 420 NW 5 St., OKC, OK 73102

Most Routes

Monday, March 12, 2018 - 12 p.m.
Ralph Ellison Library - 2000 NE 23
St, Oklahoma City, OK 73111
Routes 002 and 022
Wednesday, March 14, 2018 - 5:30
p.m.
Capitol Hill Library - 327 SW 27 St.
Oklahoma City, OK 73109
Routes 013 and 040
Monday, March 19, 2018 - 5:30
p.m.
Warr Acres Library - 5901 NW 63
St, Warr Acres, OK 73132
Route 008
Public Hearing
Friday, April 6, 2018 - 9 u.m.
City Hatl - 200 N Walker Oklahoma

City, OK 73102 Most Routes

The same content will be presented at all meetings.

Process for Receiving Comments

The COTPA Board of Trustees encourages public comments at community meetings, on the date of the public hearing or in writing beforehand. Those desiring to speak at the Public Hearing contact EMBARK 405-297-1331 to register. Advance registration will be accepted until 4 p.m. on the day prior to the hearing. Those who have not pre-registered may sign up immediately before the hearing begins and will be scheduled to speak after those who have pre-registered. In addition, written comments received any time before the hearing is adjourned will become a part of the official hearing record. Written comments may be submitted on the date of the hearing, emailed to embarkok@oke.gov, or unifed in advance to:

EMBARK

Attn: 2018 Fare & Service Changes 2000 S May Ave

Oklahom City, OK 73108

Individuals submitting written contracts must include their name, address, email, and phone number.

Notice for the Hearing and Visually Impaired

If you wish to attend the public hearing and need sign language interpretation, please notify EMBARK at least 72 hours in advance by calling *711. Ask the operator to call 405-235-7433.

For Additional Information

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(3-9, 3-16-18)

APPENDIX B Meeting Materials



PUBLIC NOTICE

The Central Oklahoma Transportation and Parking Authority (COTPA) hereby provides notice of a Public Hearing and five Community Meetings in order to receive comments on proposed bus service modifications and fare changes planned for implementation July 29, 2018.

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Community Meeting Schedule

Thursday, March 8, 2018 – 12 p.m. Almonte Library – 2914 SW 59 St. Route 012

Saturday, March 10, 2018 – 9:30 a.m. Downtown Transit Center – 420 NW 5 St. Most Routes

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Monday, March 19, 2018 – 5:30 p.m. Warr Acres Library – 5901 NW 63 St. Route 008

Public Hearing

Friday, April 6, 2018 – 9 a.m. City Council Chambers – 200 N Walker Most Routes



HOW TO SUBMIT OFFICIAL COMMENTS

The COTPA Board of Trustees encourages public comments at community meetings, in writing before the hearing or on the date of the public hearing.

All written comments should include name, address, email and phone number.

Written comments may be submitted on the date of the hearing, emailed to embarkok.com, or mailed in advance to:

EMBARK

Attn: 2018 Fare/Service Changes

2000 S May Ave

Oklahoma City, OK 73108



SUMMARY OF SERVICE CHANGES

Modify Route 050 route and schedule

Current Route 050 Schedule

	Monday & Tuesday	Wednesday to Saturday	Night Service
First Bus	10:00 a.m.	10:00 a.m.	8:00 p.m.
Buses every	30 min	15 min	30 min
Last Bus	8:00 p.m.	8:00 p.m.	11:00 p.m.

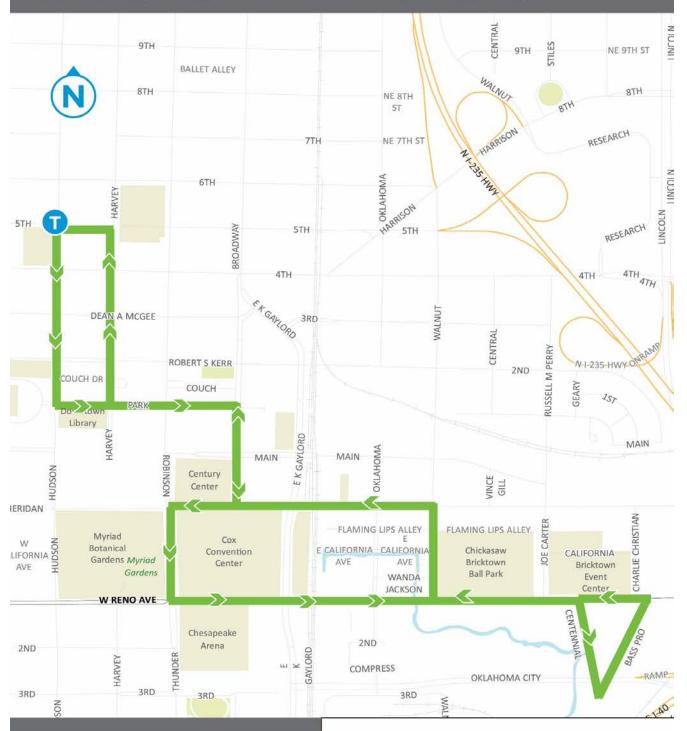
Proposed Route 050 Schedule

	First Bus	Bus every	Last Bus
Monday to Saturday	6:00 a.m.	30 min	11:30 p.m.



EXISTING

ROUTE 050



≥MB^RK
2018 PROPOSED
Route Change

LEGEND

EXISTING RT 050

EXISTING & PROPOSED

ROUTE 050



≥MB^RK
2018 PROPOSED
Route Change

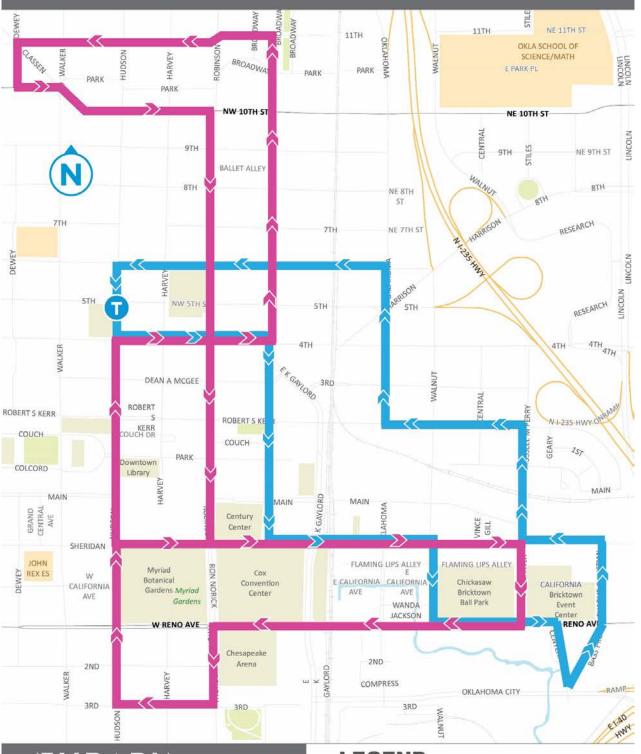
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EXISTING RT 050

PROPOSED RT 050

ROUTES

PROPOSED 050 STREETCAR

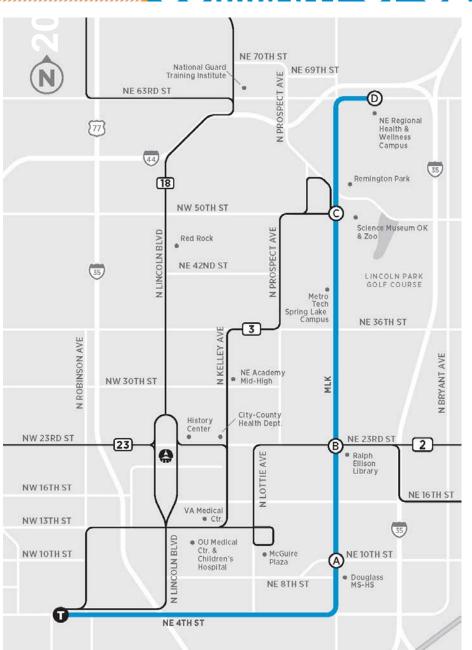


≥MB^RK
2018 PROPOSED
Route Change

LEGEND

PROPOSED RT 050
OKC STREETCAR

SUMMARY OF SERVICE CHANGES

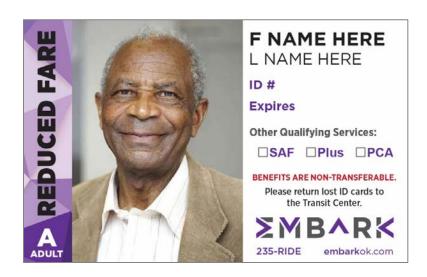


Add weeknight service hours to Route 022.

Hourly (60 minute) service would be provided from 7 pm to Midnight on weekdays.

Please Note: All services are subject to annual budget appropriations.

Qualification for reduced fare benefits, based on age, will increase to age 65 from age 60.



The age requirement only applies to new applications dated July 29, 2018 or later. Customers <u>already</u> carrying an EMBARK Reduced Fare Benefit card will continue to receive the benefit.



Eliminate the issuance of fare change cards from fare boxes from fixed-route buses.



Any fare change card issued prior to July 29, 2018 will be honored through June 30, 2019.



Establish all existing fixed-route bus passes as universal passes. Universal passes grant its holder access to both fixed-route bus and streetcar services.

Current Pass System Benefits



All Fixed-Route Bus Services

Universal Pass System Benefits

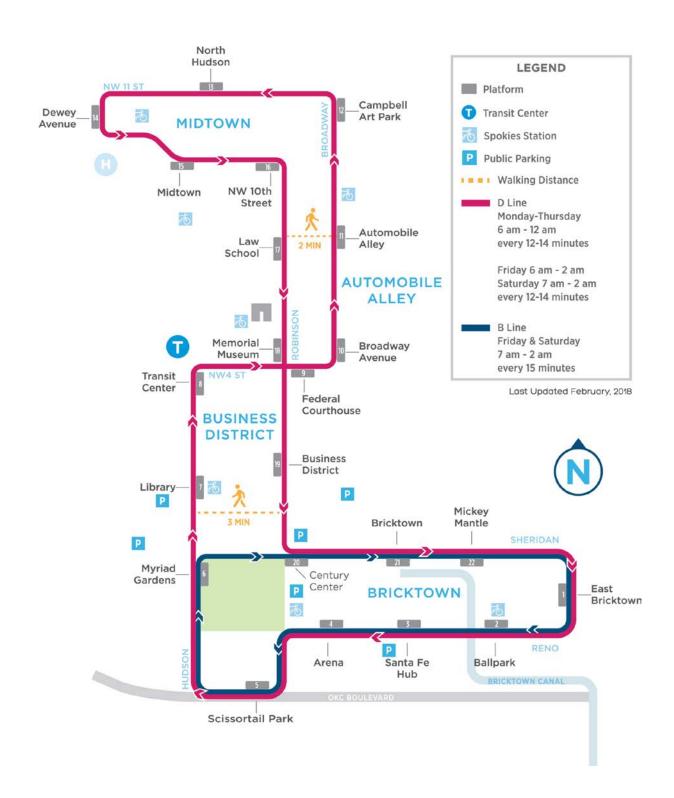


All Fixed-Route Bus Services



Establish an Universal Annual Pass for \$600.00.







Establish a downtown circulator fare schedule for Route 050 and Streetcar only services as:

Single Trip Fare*	\$ 1.00 per boarding
Day Pass*	\$ 3.00
Monthly Pass*	\$ 32.00
Annual Pass*	\$384.00

*Standard Reduced Fare Benefits Apply





Official Comment

Please use the space below to write your comment regarding the proposed 2018 Fare and Service Changes

Please Write Your Comment Below	
Please Print Clearly	
···· Please provide your information below	
:	
:	
:	- "
Full Name	E-mail
•	
•	Phone
Address	Phone
‡	

APPENDIX C Sign-In Sheets and Meeting Notes

EMBARK may contact you regarding other public meetings and various service options.

Note that this sign-in sheet is subject to open record requests.

PUBLIC HEARING				
Project: Proposed 2018 F	are and Service Changes	Meeting Date:	03/08/2018, 12:00 pm	
Facilitator: EMBARK		Place/Room:	Almonte Library	

Name	Organization	E-Mail
patasua la/made		1. Hlow Ma 1975 gmaile
Kari Shamblin		J Grienz
Malala Jam		
Voronian Planinez		JERONICA R
JESSE PLUEU		
Chip Noten		
Michael Servy		
Kaga Wasty		
Tyshocke Dally		
. 0		
	9	

		9

Almonte Library -2914 SW 59 St.

COMMUNITY MEETING NOTES

Attending

Attendee(s): 1

Staff: 8

Start time: 12:03 pm End time: 12:56 pm

Announcements

Based on input gathered at the meetings and hearing, the COTPA Board of Trustees will act on these changes in May and implementation would occur on July 29, 2018.

- Proposal of route 50 changes and new streetcar route.
 - o Questions:
 - When is the streetcar coming?
 - o Comments:
 - Individual noted she had to take the Edmond bus to get to Deep Deuce, but with the proposed change to route 50, it will be easier to get to her destination.
 - Attendee was very excited about the streetcar
- Proposal of route # 022 operating until midnight (60-minute service from 7 pm to Midnight on weekdays)
 - o Questions:
 - No questions regarding the proposed implementation of night service on route 22
 - o Comments:
 - Happy about the midnight expansion
- Proposal of the fare structure on the streetcar and Route 50
 - o Questions:
 - No questions regarding the proposed fare structure
- Proposal of the universal pass option
 - o Questions:
 - No questions regarding the proposed implementation of the annual pass
 - o Comments:
 - Attendee like the idea of having an Annual pass but probably will not use it.

- Proposal of age requirement (age 60 to Age 65)
 - o Questions:
 - No questions regarding age requirements
- Proposal of the elimination of change cards
 - o Questions:
 - No question regarding the elimination of change cards
 - o Comments:
 - Likes the benefit of the change cards but understood why we would want to eliminate it.
 - Attendee was concerned about having correct fare, because most people do not carry change.
 - Attendee admits she has her change cards for long periods of time before she uses them.
- Introduction of possible mobile payment
 - o Questions:
 - No questions regarding the possibility of the mobile payment app
 - o Comments:
 - Attendee was excited about the possibility of the mobile payment
- Additional Comments:
 - Wants to see a bus that goes through the Paseo District
 - Concerned about the schedules on the existing mobile app
 - Has trouble using the texting feature on her cell phone

Overall, all proposed changes were embraced, and attendee seemed to be very excited about the forward progress of our Transit System.

EMBARK may contact you regarding other public meetings and various service options.

Note that this sign-in sheet is subject to open record requests.

PUBLIC HEARING

Project:

Proposed 2018 Fare and Service Changes

Meeting Date:

03/5/2018, 12:00 pm 9:30 a.m

10

Facilitator:

EMBARK

Place/Room:

Almonte Library Transit Contex

Name	Organization	E-Mail
DWANE K. SCHELL	1 NO -	
JEROME V. BIELAMOWICZUR		JUBCHEFE SEC GLOBAL, NE
JoBeth Yamon		jobeth. hamon@gmail.co
MARTY PEETZCH	HomeressAurance	MPERRY CHONELESSALLIANCE. OF G.
Luz Rodriguez		
WENDELL NEWELL		VINSCH M DE Y DHOS
HANH TRAN		
PHUC NGUYEN		
Sonya K Blackburn		Byahor com
Philip Hall	wort	
Source Anderson		Anderjoy 46@ Consil
Ling K. Pallal		
Darla Bell	Self	darla_bell@yaho kittynars72 9 Vahoo
CMPTS COX	.01/8-	Kittynars 72 8 Vahoo
gragdalen Riv		
John Hudson	* ·	NDNTYPIST1@ Yahoo. Com
Caitlin ford	EMBARK	
Michael Ened	(1	
Jason Ferbracke	7)	

Page 1 of 1

Kadja Washington

Saturday, March 10, 2018- 9:30 pm

Downtown Transit Center-420 NW 5 St.

Community Meeting Notes

Attending

Attendee(s): 16

Staff: 4

Start time: 9:36 am End time: 10:20 am

Announcements

Based on input gathered at the meetings and hearing, the COTPA Board of Trustees will act on these changes in May and implementation would occur on July 29, 2018.

- Proposal of route 50 changes and new streetcar route.
 - o Questions:
 - Who will operate the streetcar?
 - How frequently will the streetcar operate?
 - o Comments:
 - The attendees agreed that the new route 50 is easier to understand
- Proposal of route # 022 operating until midnight (60-minute service from 7 pm to Midnight on weekdays)
 - o Questions:
 - When will the changes take place
 - When will we have Sunday service?
 - o Comments:
 - Happy about the midnight expansion
 - They were happy to have WIFI available on the buses
- Proposal of the fare structure on the streetcar and Route 50
 - o Questions:
 - No questions regarding the proposed fare structure
- Proposal of the universal pass option
 - o Questions:
 - Will the universal pass be half-price for those who receive reduced fare benefits?
 - Is EMBARK going to combined fares?
 - Will the pass prices change?
 - What if you lose your annual bus pass?

- Will the Reduced Fare card on all services?
- Will there be a fee schedule?
- o Comments:
 - The attendees were very interested in the universal pass
- Proposal of age requirement (age 60 to Age 65)
 - o Questions:
 - Will Medicare card still be accepted?
- Proposal of the elimination of change cards
 - o Questions:
 - Will it affect the value passes too?
 - o Comments:
 - No comments; however, all the attendees were familiar with change cards and agreed the elimination of change cards will speed up the boarding process
- Introduction of possible mobile payment
 - o Questions:
 - Are we going to have a mobile payment app?
 - Can I purchase a bus pass from the mobile app?
 - o Comments:
 - No comments; however, Attendees were excited about the possibility of the mobile payment

Overall, all proposed changes were embraced and accepted by all attendees. Everyone seemed to be very excited about the changes and think they are reasonable.

EMBARK may contact you regarding other public meetings and various service options.

Note that this sign-in sheet is subject to open record requests.

PUBLIC HEARING				
Project:	Proposed 2018 Fare and Service Changes	Meeting Date:	03/12/2018, 12:00 pm	
Facilitator:	EMBARK	Place/Room:	Ralph Ellison Library	

Name	Organization	E-Mail
TAYLOR DOE	3EAST	TDOE @ SEAST. IO
	EMBARK	
Kadja Washington Veroniaa Roming	EMBARIL	
Stuart Campbell	ACOG	& Scampbell Cacgok.og
Stuart Campbell Evens	C. ty	
michal Scruggirs	Embarky	
Jason Ferbrache	',)	
Jason Ferbrache Megan White	(,	
Chip Nolen	((

Monday, March 12, 2018- 12 pm

Ralph Ellison Library-2000 NE 23 St.

Community Meeting Notes

Attending

Attendee(s): 3

Staff: 6

Start time: 12:10 pm End time: 12:56 pm

Announcements

Based on input gathered at the meetings and hearing, the COTPA Board of Trustees will act on these changes in May and implementation would occur on July 29, 2018.

- Proposal of route 50 changes and new streetcar route.
 - o Questions:
 - Is the proposed change to route 50 longer?
 - Is it going to change operationally?
 - o Comments:
 - No comments.
- Proposal of route # 022 operating until midnight (60-minute service from 7 pm to Midnight on weekdays)
 - o Questions:
 - When will we see more routes running to midnight?
 - Is there a correlation between lower income and night jobs?
 - o Comments:
 - Happy to see the night service expanding, because it creates more job opportunities.
- Proposal of the fare structure on the streetcar and Route 50
 - o Questions:
 - Do we know the turn rate?
 - Why is there a price break for the streetcar and route 50 vs. the fixed route service?
- Proposal of the universal pass option
 - o Questions:
 - No questions regarding Universal Pass option
 - o Comments:
 - The attendees were very interested in the universal pass

- Proposal of age requirement (age 60 to Age 65)
 - o Questions:
 - What is the policy regarding exiting the bus?
- Proposal of the elimination of change cards
 - o Questions:
 - What is the process of the change card?
 - Is the issuance of change cards common on other transit systems?
 - Can multiple change cards be used at the same time?
 - o Comments:
 - Concern about having fare ready before the bus gets to the stop when the bus stop is not in the safest area (especially for elderly patrons).
- Introduction of possible mobile payment
 - o Questions:
 - Will the mobile app work with the Spokies rental?
 - Will the bus passes be available on the mobile app?
 - o Comments:
 - No comments; however, Attendees were excited about the possibility of the mobile payment

Overall, all proposed changes were embraced and accepted by all attendees. Everyone seemed to be very excited about the changes and think they are reasonable.

EMBARK may contact you regarding other public meetings and various service options.

Note that this sign-in sheet is subject to open record requests.

PUBLIC HEARING

Project:

Proposed 2018 Fare and Service Changes

Meeting Date:

03/14/2018, 5:30 pm

Facilitator:

EMBARK

Place/Room:

Capitol Hill Library

Name	Organization	E-Mail
Jeremy Moses		JM 05 222007@hota
Bruce Johnson Ramona Johnson		Sruce Johnson 182@gmail.
SHANE HAMPTON	1 .11	Shanehamp@gmad.com
Vatorias 2 am	5 Emball EMBARK	
Michael Enorgy	EMISACE	
Jason Forbrache	11	
Kada Washington	Embark	
	2	
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Capitol Hill Library-327 SW 27 St.

Community Meeting Notes

Attending

Attendee(s): 4

Staff: 4

Start time: 5:34 pm End time: 6:36 pm

Announcements

Based on input gathered at the meetings and hearing, the COTPA Board of Trustees will act on these changes in May and implementation would occur on July 29, 2018.

- Proposal of route 50 changes and new streetcar route.
 - Questions:
 - How many streetcars will be in service?
 - What is the frequency of the streetcar?
 - As a Deep Deuce Resident, how will the discovery route and streetcar be beneficial to me?
 - Have EMBARK reached out to the residents of downtown?
 - How did EMBARK come up with the streetcar route?
 - Where does OKC fit in with other transit systems?
 - o Comments:
 - One attendee can't imagine using the streetcar when he can just walk
 - All distances are too short
 - Maybe it should go clockwise and counterclockwise
- Proposal of route # 022 operating until midnight (60-minute service from 7 pm to Midnight on weekdays)
 - o Questions:
 - Will the route 22 follow the same route?
 - What's the possibility of Sunday Service?
 - o Comments:
 - Some attendees opt to stay in OKC, so they will have better access to Public Transit versus living in other surrounding cities.
 - It seems like OKC is growing and like the progress that transit is making.
- Proposal of the fare structure on the streetcar and Route 50
 - Questions:
 - Will the current passes work on the streetcar?
 - o Comments:

- No comment; however, the audience agreed this is a reasonable change.
- Proposal of the universal pass option
 - o Questions:
 - Will there be a reduced fare option?
- Proposal of age requirement (age 60 to Age 65)
 - o Questions:
 - No questions regarding age requirements
- Proposal of the elimination of change cards
 - o Questions:
 - Will there be a change machine available at the Transit Center?
 - o Comments:
 - Some attendees were familiar with change cards
 - Some attendees experienced occasions when the bus was delayed because of a change card issue.
 - Attendees expressed how important on-time performance is.
- Introduction of possible mobile payment
 - Questions:
 - How secure is the mobile app?
 - o Comments:
 - No comments; however, Attendees were excited about the possibility of the mobile payment

Overall, all attendees were excited about the changes and believed they were reasonable.

EMBARK may contact you regarding other public meetings and various service options.

Note that this sign-in sheet is subject to open record requests.

PUBLIC	HEARING	•		
Project:	Proposed 2018 Fare and Service Changes	Meeting Date:	03/19/2018, 5:30 pm	
Eacilitator:	EMBARK	Place/Poom:	Warr Acres Library	

Name	Organization	E-Mail
Koby Cox		Kobyco X @gmail.com
Jennifer Ratliff		Kobyco X@gmail.com jjnrat liff@gmail.com
Madia Washington	EMBARK	ω
	Em BARR	
Tyshocka Halley Ronita Jones	New View Oklahoma	(jones@newviewoklaHoma.o
Katy Ng	New View OKIChoma	
Michael Sug	Embark	
Chip Notes	(+	
Jason Ferbrache	ų	

Warr Acres Library -5901 NW 63rd

Community Meeting Notes

Attending

Attendee(s): 4

Staff: 5

Start time: 5:34 pm End time: 6:11 pm

Announcements

Based on input gathered at the meetings and hearing, the COTPA Board of Trustees will act on these changes in May and implementation would occur on July 29, 2018.

- Proposal of route 50 changes and new streetcar route.
 - o Questions:
 - No questions regarding route 50 proposed changes or the proposed implementation of the streetcar route.
 - o Comment:
 - The attendees appreciated the ease off getting on and off the streetcar.
- Proposal of route # 022 operating until midnight (60-minute service from 7 pm to Midnight on weekdays)
 - o Questions:
 - No questions regarding the proposed implementation of night service on route 22.
 - o Comments:
 - Night service is important to them and like to see more night routes added in the future.
- Proposal of the fare structure on the streetcar and Route 50
 - o Questions:
 - No questions regarding the proposed fare structure
- Proposal of the universal pass option
 - o Questions:
 - Is the universal pass good for all service lines?
 - Will the pass prices change?
 - Is there going to be any changes to EMBARK PLUS?
 - Is there price increase to EMBARK PLUS?
 - Will the universal pass work on EMBARK PLUS?

- Proposal of age requirement (age 60 to Age 65)
 - o Questions:
 - No questions regarding age requirements
- Proposal of the elimination of change cards
 - o Questions:
 - No question regarding the elimination of change cards
 - o Comments:
 - All the attendees were familiar with change cards
 - Some attendees experienced occasions when the bus was delayed because of a change card issue.
- Introduction of possible mobile payment
 - o Questions:
 - Are you all planning to implement the mobile payment in July?
 - o Comments:
 - No comments; however, Attendees were excited about the possibility of the mobile payment

Overall, all proposed changes were embraced and accepted by all attendees. Everyone seemed to be very excited about the changes.

APPENDIX D Public Comments Received as of 04/26/18

Official Comment

Please use the space below to write your comment regarding the proposed 2018 Fare and Service Changes

Please Write Your Comment Below - Please Print Clearly Toveral that these inversion of esp	support this st ments lead the exially nighttime	plan. I do hop to opportunities fo services,	e r further

··· Please provide your information below ······	
Full Name Jeremy Moses	E-mail mos 222007@ hotmail.com
Address 12105 5 Western Ave Apt 1212	Phone 859-360-4587

MINUTES

CENTRAL OKLAHOMA TRANSPORTATION AND PARKING AUTHORITY MEETING

April 06, 2018

TRUSTEES PRESENT: Chris Kauffman, Chairman

Barney Semtner, Vice Chairman

Steve Hill James Couch Craig Freeman Laura Johnson James Cooper Kay Bickham

TRUSTEES ABSENT: David Greenwell

STAFF PRESENT: Jason Ferbrache

Iris Newman
Kari Shamblin
Justin Broesel
Cory Hubert
Michael Scroggins
Kevin Mulcahy
Jesse Rush
Marilyn Dillon
Dennis Fry
Eugene Fritz
Larry Hopper
Jeanne Smith
Melisa Rousey

Chris Bourke

Suzanne Wickenkamp

I. CALL TO ORDER

II. ITEMS FROM THE CHAIRMAN

III. CITIZENS TO BE HEARD

IV. APPROVAL OF MINUTES

APPROVED. Moved by Semtner, Seconded by Johnson. AYES: Bickham, Cooper, Freeman, Greenwell, Hill, Johnson, Kauffman, Semtner.

A. Approval of the Minutes of the COTPA Board Meeting Held on March 2, 2018.

V. CONSENT DOCKET

APPROVED. Moved by Bickham, Seconded by Freeman. AYES: Bickham, Cooper, Freeman, Greenwell, Hill, Johnson, Kauffman, Semtner.

- A. Approval of Permanent Easement Between the Central Oklahoma Transportation and Parking Authority and the City of Oklahoma City, South of NE 50th Street and West of I-35.
- B. Approve Contract Renewal for Public Relations & Marketing Services (COTPA 2014022) with Anglin Public Relations. Estimated cost \$100,000 annually, April 30, 2018 through May 1, 2019.
- C. Approve Contract Renewals for Printing Services (COTPA 2016028) with The Oklahoman Media Co., Southwestern Stationery & Bank Supply, and Sermar Printing, Estimated Cost \$50,000 Annually, April 30, 2018 Through May 1, 2019.
- D. Approval of Lease Agreement with Lanier Law Firm, P.C., June 1, 2018 through May 31, 2023.
- E. Resolution of The Central Oklahoma Transportation and Parking Authority Board of Trustees Regarding Amendment of The Central Oklahoma Transportation and Parking Authority Pension Plan and Related Trust (The "Plan") with Respect to the Method by which Contributions to the Central Oklahoma Transportation and Parking Authority Pension Fund (The "Fund") are to be Repaid; Authorization for the Proper Officers to do All Things Necessary and Proper to Keep the Plan in Compliance; Authorization to Deliver an Executed Amendment to BOKF, NA DBA Bank of Oklahoma or Any Successor Custodian Bank; and Authorization to Notify All Employees Covered by the Plan Concerning This Amendment.
- F. Approve Agreement with Oklahoma Natural Gas (ONG) for Installation of 1,250 Feet of 12" Natural Gas Main, 100 Feet of Natural Gas Service Line and One Meter to Serve EMBARK's CNG Fueling Station
- G. Resolution Authorizing the Open Market Purchase of Media Services for Fiscal Year 2018-19, Estimated Cost \$125,000.00, July 1, 2018 through June 30, 2019.
- H. Approval of Interlocal Cooperation Agreement Between the Central Oklahoma Transportation and Parking Authority (COTPA) and The City of Oklahoma City, Term of Five Years from the Day Approved by Oklahoma City Council.

VI. ITEMS FOR INDIVIDUAL CONSIDERATION

C.

A. Approval of Final Plans and Bidding Documents for Project No. MC-0564, EMBARK CNG Fueling Station Facility and Authorize the Administrator to Advertise and Release the Bidding Documents.

APPROVED. Moved by Semtner, Seconded by Cooper. AYES: Bickham, Cooper, Freeman, Greenwell, Hill, Johnson, Kauffman, Semtner.

B. Resolution Detailing Public Hearing Regarding Changes to the Route 050 Route and Schedule; Addition of Weeknight Service to Route 022; Qualification for Reduced Fare Benefits, Based on Age, will Increase to Age 65 from Age 60; Eliminate the Issuance of Fare Change Cards from Fare Boxes from Fixed-Route Buses; Establish all Existing Fixed-Route Bus Passes as Universal Passes; Establish a Universal Annual Pass; and Establish a Downtown Circulator Fare Schedule.

APPROVED. Moved by Bickham, Seconded by Cooper. AYES: Bickham, Cooper, Freeman, Greenwell, Hill, Johnson, Kauffman, Semtner.

Public Information and Marketing Manager Michael Scroggins presented information during this, the sixth, Public Hearing regarding these changes.

Mr. Jeremy Moses commented on the proposal to add weeknight service to Route 22. He strongly believes there is a need for it, since he recently discovered that there was no way for him to get to the Greyhound Bus Station from his home on S. Western Ave.

Mr. Taylor Doe brought to the attention of the Board his opinion on the relationship between transportation and employment. He stated his support for Route 22 being available until midnight and how that would positively impact his students and their families.

Trustee James Cooper reiterated Mr. Doe's conclusion that more routes that are available until midnight would positively impact the community and Route 22 is the next step in the right direction for transportation. Trustee Cooper also expressed his appreciation to Mr. Moses for his comments.

Trustee Laura Johnson asked Mr. Scroggins to describe the comments, attendance and feedback from the previous Public Hearings. Mr. Scroggins explained that there would be a report detailing these requests that will be brought to the Board.

Trustee Cooper inquired as to the education effort for the community regarding the elimination of Change Cards and complimented Embark on allowing seniors that currently qualify for reduced fare benefits to continue to receive those benefits. Mr. Scroggins reprised the change cards would remain active until the end of the following fiscal year, currently June 30, 2019. Mr. Scroggins also stated no new change cards would be issued after June 29, 2019. Mr. Scroggins also added that comments from the public were in favor of this change due to issues they personally experienced while using the change cards and the educational effort will be robust to ensure the public is aware exact change is needed when boarding the bus.

Resolution Authorizing the Administrator of the Central Oklahoma Transportation and Parking Authority to Provide Subcontractor Approval to Herzog Transit Services, Inc. (COTPA2017004) for the Operation and Maintenance of the Oklahoma City Streetcar System.

APPROVED. Moved by Freeman, Seconded by Hill. AYES: Bickham, Cooper, Freeman, Greenwell, Hill, Johnson, Kauffman, Semtner.

D. Approve Plans and Specifications for Project MB-1343, Santa Fe Parking Garage, 1 Santa Fe Plaza, White Box & Tenant Improvements and Authorize Administrator to Advertise for Bids.

APPROVED. Moved by Johnson, Seconded by Bickham. AYES: Bickham, Cooper, Freeman, Greenwell, Hill, Johnson, Kauffman, Semtner.

VII. RATIFICATION OF CLAIMS AND PAYROLL

A. Ratification of Payroll and Vendor Claims for the Period March 6 through March 27, 2018.

RATIFIED. Moved by Johnson, Seconded by Freeman. AYES: Bickham, Cooper, Freeman, Greenwell, Hill, Johnson, Kauffman, Semtner.

VIII. RECEIVE FINANCIAL REPORTS

A. Receive the COTPA Schedules of Revenues and Expenditures - Budget to Actual for the Eight Months Ended February 28, 2018.

RECEIVED. Moved by Hill, Seconded by Freeman. AYES: Bickham, Cooper, Freeman, Greenwell, Hill, Johnson, Kauffman, Semtner.

IX. RECEIVE PROGRAM REPORTS (Notes: **Verbal Report to be Given)

RECEIVED. Moved by Semtner, Seconded by Bickham. AYES: Bickham, Cooper, Freeman, Greenwell, Hill, Johnson, Kauffman, Semtner.

- A. Transit System Report
- B. Streetcar Report**

Streetcar Operations Manager Jesse Rush presented the Streetcar Report. Chairman Kauffman requested a copy of Standard Operations Procedures status report in future Board books. Mr. Rush replied yes. Trustee Laura Johnson inquired about the precautions for the Memorial Marathon. Mr. Rush replied that there will be barricades as well as construction plates with anti-skid tape on them for the safety of the runners. Trustee Johnson then inquired about the in-ground streetcar tracks being a hazard for cyclists and Mr. Rush answered that there will be safety messaging well in advance to inform citizens. Trustee Steve Hill asked Mr. Rush to define completion of the streetcar project. Mr. Rush replied when the track is imbedded in the ground and could be opened to through traffic.

- C. Long Range Plan Report
- D. Parking System Program Report**

Parking Operations Manager Cory Hubert presented the Parking Report. Trustee Craig Freeman asked if there would be more consistent striping in the compact car zone. Mr. Hubert said yes, and the numbering would remain the same. Trustee Cooper asked how parking customers will know if a space is reserved. Mr. Hubert responded there is a industry-wide standard and there has never been any issues with this in the past. Mr. Hubert also stated the current 90-degree spaces will be wider. Chairman Kauffman asked if all the garages will have signs. Mr. Hubert responded, yes.

- E. Marketing, Customer Relations and Technology Report
- F. Oklahoma River Cruises and Spokies Report**

River Transit Manager Jeanne Smith presented the Oklahoma River Cruises and Spokies Report. Chairman Kauffman inquired about a newspaper article about an individual bringing bicycles into Oklahoma City. Ms. Smith answered that the individual is Ryan Fogle with Ride OKC who plans to initiate bicycle tours.

X. ITEMS FROM TRUSTEES

XI. ADJOURNMENT

Respectfully Submitted,

Jason Ferbrache Administrator TO:

Chairman and Board of Trustees

FROM:

Administrator

Adopt Resolution Setting a Public Hearing Regarding Changes to the Established Boundary of ADA Paratransit Zone 2, the Addition of an ADA Paratransit Zone 3 and a Zone 3 Fare.

Background

The proposed service change affects the current Zone 2 EMBARK PLUS ADA service area. The proposed service area change for Zone 2 begins at 3/4 mile from fixed route bus service and ends at 3 3/4 from fixed route bus service. The fare for Zone 2 will remain \$7.00 per trip. Additionally, a Zone 3 will be established. Zone 3 will begin at 3 3/4 mile from fixed-route bus service and extend to the City of Oklahoma City limits. The fare for this zone will be set at \$10.50 per trip.

Two public outreach meetings were held at the Downtown Transit Center on Tuesday, October 17, 2017 at 11:30 a.m. and Thursday, October 19, 2017 at 3:30 p.m. Information shared at the public outreach meetings was a result of feedback received from paratransit customers and stakeholders gathered during structured focus groups about changes to service area and fares and recommendations from

staff.

LFR Issue

Sustainable Growth and Service Development

Review

Public Transportation and Parking Department and Municipal Counselor's Office

Recommendation: Receive Comments From Public Regarding Changes to the Established Boundary of ADA Paratransit Zone 2, the Addition of an ADA Paratransit Zone 3 and a Zone 3 Fare

Jason Ferbrache Administrator

RESOLUTION SETTING A PUBLIC HEARING REGARDING CHANGES TO THE ESTABLISHED BOUNDARY OF ADA PARATRANSIT ZONE 2 AND THE ADDITION OF AN ADA PARATRANSIT ZONE 3 AND ZONE 3 FARE

WITNESSETH

WHEREAS, pursuant to FTA's Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" and in accordance with established policy, public hearings are required for major service changes and fare changes; and

WHEREAS, the Central Oklahoma Transportation and Parking Authority (COTPA) held two public outreach meetings at the Downtown Transit Center on Tuesday, October 17, 2017 11:30 a.m. and Thursday October 19, 2017 at 3:30 p.m.; and

WHEREAS, information shared at the public outreach meetings was a result of feedback received from paratransit customers and stakeholders gathered from structured focus groups as well as staff recommendations; and

WHEREAS, a public hearing to receive official comment will be held on November 3, 2017; and

NOW, THEREFORE, BE IT RESOLVED that the Chairman and Trustees of Central Oklahoma Transportation and Parking Authority will hold a public hearing during the regular scheduled Board of Trustees meeting on November 3, 2017.

CENTRAL OKLAHOMA TRANSPORTATION AND PARKING AUTHORITY

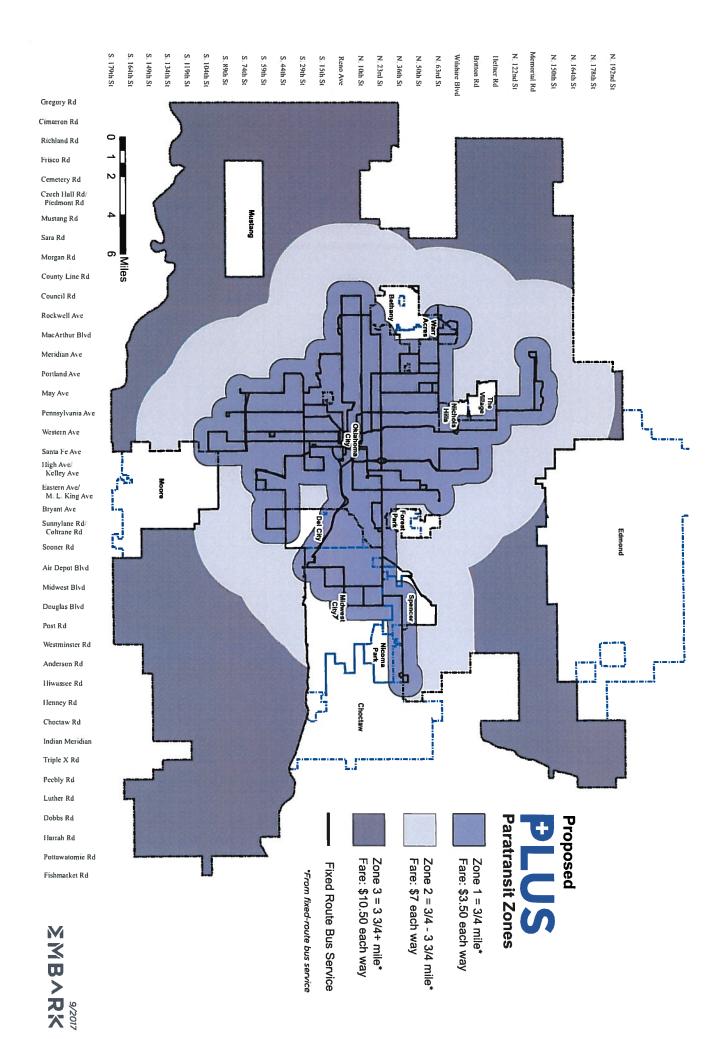
Chairman

ATTEST: (Seal)

Secretary

REVIEWED for form and legality.

Assistant Municipal Counselor



TO:

Chairman and Board of Trustees

FROM:

Administrator

Approval of Bus System Change Eliminating Link Service effective August 1, 2016.

Background

For over 15 years COTPA has provided a contracted Flexible (Point Deviation) Bus Route service currently known as Link. Link offers transportation services in a limited area of Oklahoma City on weeknights and on Sundays and is open to the general public. At the time Link service was started, COTPA did not provide night bus service.

For the last two years, COTPA has launched and expanded basic fixed-route bus service running until midnight. With fixed-route buses now serving many of the same areas as the Link service, duplication in service exists. In addition, ridership for Link service both on weeknights and on Sundays has declined steadily over the last three years.

In order to eliminate duplication of services during the weeknights, preserve funding for more efficient transportation services and provide a level of transit service system wide that can be supported by the FY 2017 budget, staff recommends terminating Link service in its entirety beginning August 1, 2016. The elimination of Link service is estimated to save \$422,000 in the amount of local funds needed to support transit. With this budget reduction no fixed-route bus service or paratransit bus service will be impacted.

A community meeting was held on June 12, 2016 and a Public Hearing was conducted on June 22, 2016 to provide information to and receive feedback from customers about the proposed service change.

LFR Issue

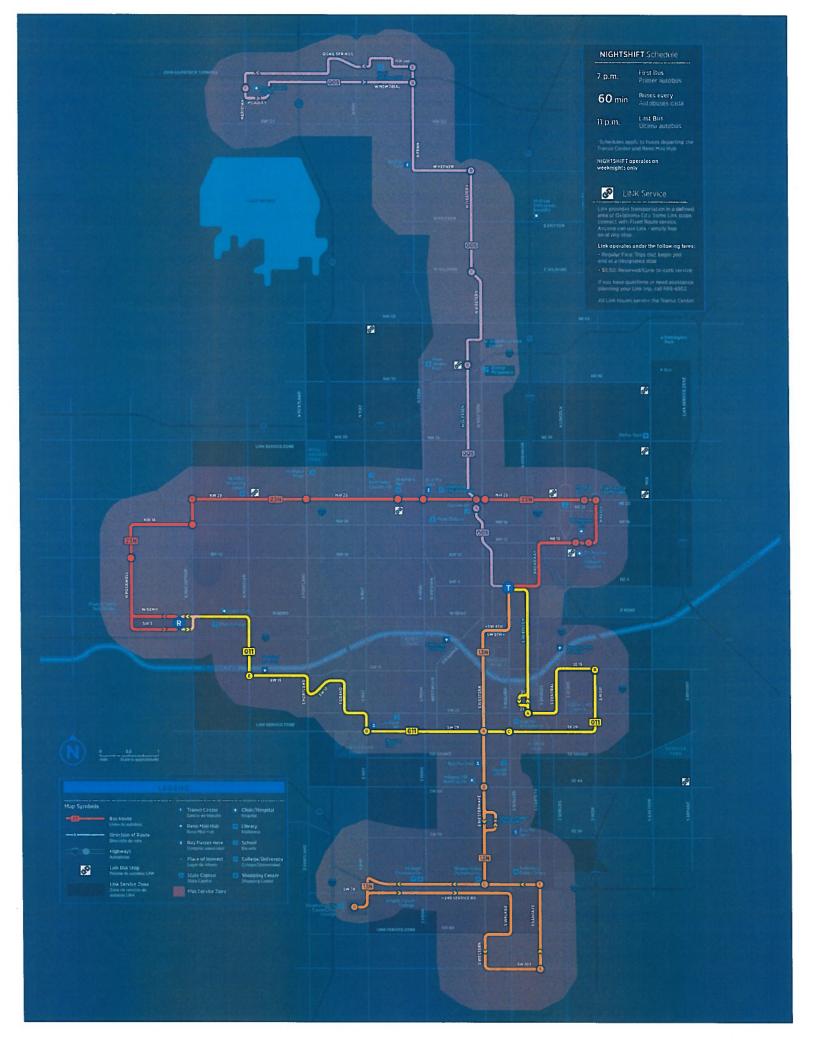
Community Relations

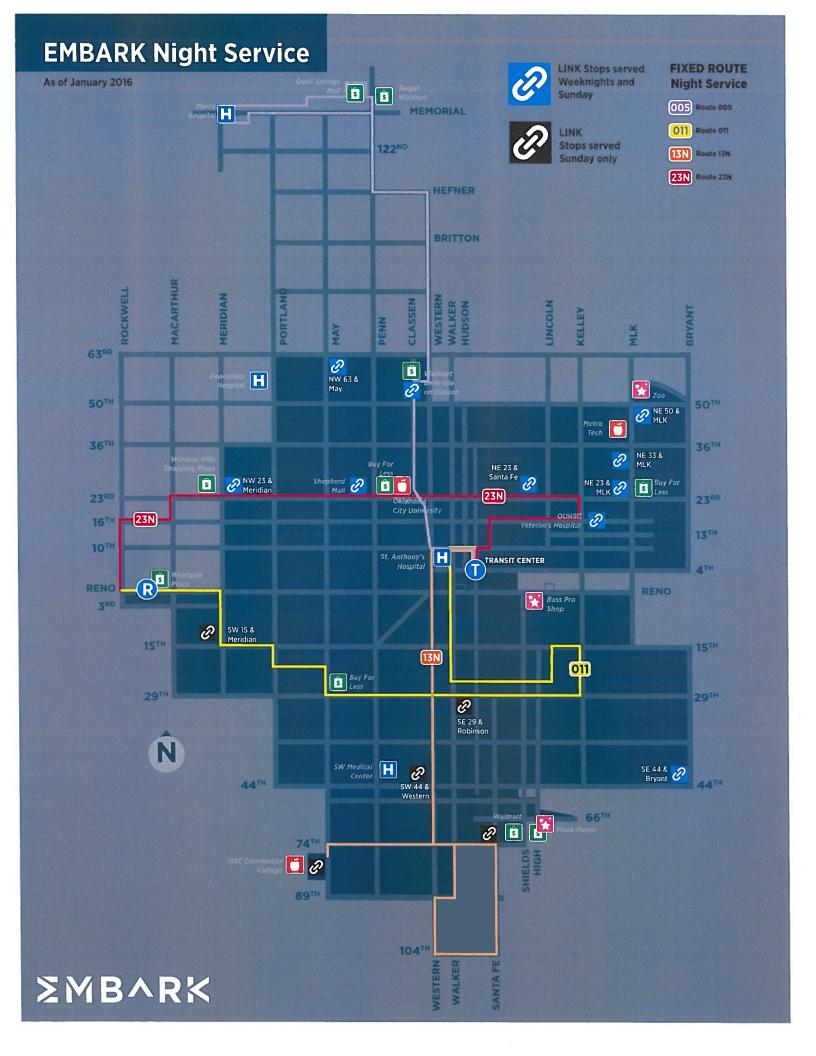
Review

Public Transportation and Parking Department and Municipal Counselor's Office

Recommendation: Approve the system change

Jason Ferbrache Administrator





PROPOSED

SERVICE CHANGE

If approved, the change will become effective August 1, 2016.

ELIMINATION OF LINK CONTRACTED SERVICE

Link service operates Sundays 7 am - 7 pm and Monday through Friday 7 pm - Midnight.

The proposed elimination <u>does not</u> affect Nightshift routes 005, 011, 13N and 23N that operate weekdays until midnight.

COMMUNITY MEETING

Sunday, June 12, 2016 at 2:30 pm. Transit Center, 420 NW 5th St.

AND

PUBLIC HEARING

Wednesday, June 22, 2016 at 7:00 pm. Transit Center, 420 NW 5th St.

Need accommodations for the meeting?

Please call 235-7433 (TDD 297-2602) by 3 pm on Friday, June 17 if you require an interpreter or other disability accommodation at one of the meetings.

Can't attend a meeting?

Written comments or questions regarding the proposed elimination will be accepted through June 24, 2016 and may be emailed, embarkok@okc.gov or dropped off at the Transit Center.

Si desea obtener copias o versiones accesibles de estos documentos, comuníquese con:

Ñeå ñöôïc moät baûn vaø xem aán baûn cuûa taøi lieäu naøy, xin lieân laïc;

如需上述文件的副本或易读版本,请联系:

embarkok@okc.gov | 235-7433

APPENDIX H

SERVICE STNDARDS AND POLICIES – OTHER MODES



SERVICE STANDARDS, POLICIES AND MONITORING - Other Modes

In addition to fixed-route bus service, COTPA also operates ferry service on the Oklahoma River and downtown streetcar service.

FERRY SERVICE

COTPA's "Oklahoma River Cruises" provides seasonal ferry service between Meridian Avenue and downtown Oklahoma City via the Oklahoma River. Service is operated by a private contractor in accordance to the following service standards and policies and performance is monitored by COTPA.

SERVICE STANDARDS - Ferry

- **1.) Vehicle load ferry service:** Each ferry is rated for 49 passengers by the US Coast Guard; this limit is never exceeded.
- **2.) Vehicle headway ferry service:** There is not a service standard for ferry service headways; currently, service is generally scheduled based upon a 1-hour 40-minute roundtrip.
- **3.) On-time performance ferry service:** Ferry on-time performance is based upon departing a designated timepoint no later than 10-minutes of published schedule.
- **4.) Service availability ferry service:** Ferry service is available on a fixed schedule and fixed 7.2-mile route determined to be most efficient; service levels are dependent upon operating support.

SERVICE POLICIES - Ferry

- **1.) Distribution of transit amenities ferry service:** There are no formal service policies for the distribution of transit amenities along the ferry route. There are four landings, with parking at each location and shelters at two of the four landings.
- **2.) Vehicle assignment ferry service:** There are three (3) ferry boats in the fleet, and vessels are assigned based upon mechanical availability and engine hours. Vessels are rotated through the year to ensure they are used equally.

STREETCAR

Downtown streetcar started operations in December 2018. Though some service standards and policies have been adopted, COTPA intends to further evaluate the new service in the coming year and develop service standards and policies for formal service monitoring and reporting.

SERVICE STANDARDS - Streetcar

1.) Vehicle load – streetcar service: Each streetcar has capacity for 103 passengers. The OKC Streetcar has sufficient capacity for the projected ridership with a four to five-car operation and a vehicle load capacity of 103 passengers per vehicle (design capacity). As

- the fleet expands, EMBARK may develop a policy of adding unscheduled vehicles to address unusual loads that do exceed vehicle capacity.
- **2.) Vehicle headway streetcar service:** Service standards for streetcar headways call for 12-15 minute headways.
- 3.) On-time performance: 'On-time' is defined as departing a stop no earlier than the scheduled time and arriving the final station no later than five (5) minutes after the scheduled arrival time. A trip is considered late if either the arrival or departure, or both, occurs beyond these bounds. The minimum standard for on-time performance is 92 percent. The achieved on-time percentage shall be determined on a monthly basis as the actual number of trips meeting the on-time performance standard divided by the total number of scheduled trips. Performance varying shall be reported monthly, and the Operations Contractor will describe corrective measures that will be taken to achieve the standard. During revenue service of the Streetcar System, the Operations Contractor shall maintain daily records of on-time performance and prepare monthly reports to submit to EMBARK. Monthly reports shall describe circumstances beyond the Operations Contractor's control that impacted on-time performances, such as track blockages or accidents, so trips impacted may be removed from calculations with EMBARK authorization. Operations Contractor will also include within the monthly report the average frequency for peak and off-peak periods. Peak periods will include those periods identified in the EMBARK Service Profile.
- **4.) Service availability:** There is not a service standard for streetcar service availability. Service is provided on a 4.86-mile fixed route and scheduled to match ridership demand.

SERVICE POLICIES - Streetcar

- **1.) Distribution of transit amenities streetcar:** Shelters are available at all streetcar stations.
- **2.) Vehicle assignment streetcar:** There are seven (7) streetcars in the fleet, all built and delivered in 2018. Streetcars are assigned based upon mechanical availability. Streetcars are rotated to ensure they are used equally.

APPENDIX I





Introduction

The Public Engagement Plan (PEP) is a guide for the Central Oklahoma Transportation and Parking Authority (COTPA) doing business as EMBARK, to proactively initiate public involvement processes. The purpose of this PEP is to promote the use of effective methods to inform and provide meaningful opportunities for input by all members of the public on transportation decisions, as required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

This plan is a living document which will evolve to help EMBARK deepen and sustain its work to engage all stakeholders in its service area. The plan allows the opportunity for the public to be involved in all phases of the public comment process by providing complete information, timely public notice, the opportunity for making a comment, and full access to crucial decisions. All comments are ultimately shared with the Board of Trustees for consideration before decision making.

Definition of Public Engagement

Public engagement is the process through which stakeholders' concerns, desires, and values are incorporated into the decision-making process related to services provided by EMBARK. Distinct from those processes carried out by staff or elected officials that result in administrative decisions, public engagement refers to methods that enable stakeholders to affect and/or influence a decision-making process directly.

Primarily consisting of the public, stakeholders can include a broad range of individuals and interests such as:

- Transit customers
- Individual or groups affected by a transportation project or action
- Individual or groups that believe they are affected by a transportation project or action
- Traditionally under-served and under-represented communities
- Residents of affected geographic areas
- Government agencies
- Community-based organizations (CBOs)
- Non-governmental organizations (NGOs)

Public engagement is often described as a continuum with many possible combinations of activities that include methods related to informing, listening to, and engaging stakeholders. These activities typically culminate in the development of agreements and/or expectations related to decision outcomes.

Regulations

EMBARK functions under a wide variety of federal, state, and local requirements. The list below provides an overview of the basic laws, regulations, and regional policies EMBARK operates within.

Federal Requirements:

- Americans with Disabilities Act of 1990
- Title VI of the Civil Rights Act of 1964
- Executive Order 13166 -- Improving Access to Services for Persons with Limited English Proficiency
- Executive Order 12898 -- Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations
- National Environmental Policy Act (NEPA)

State of Oklahoma Requirements:

- Open Meetings Act
- Open Records Act
- Other Requirements

Goals & Guiding Principles

The PEP endeavors to offer meaningful opportunities for the public, including low income, minority, and limited English proficient populations, to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions by EMBARK.

Specific goals and outcomes include:

Quality Input and Participation

Comments received are useful, relevant and constructive, contributing to better plans, projects, programs, strategies, and decisions.

Consistent Commitment

EMBARK strives to communicate regularly and develop trust with communities while helping build community capacity to provide public input.

Diversity

Participants represent a range of social, economic, ethnic, and cultural perspectives, with representative participants including residents from low-income neighborhoods, ethnic communities, and residents with limited English proficiency (LEP), and other traditionally underserved people.

Accessibility

Every effort is made to ensure that opportunities to participate are physically, geographically, temporally (time of day), and linguistically accessible.

Relevance

Issues should be framed clearly and simply such that the significance and potential effect may be understood by the greatest number of participants.

• Participant Satisfaction

EMBARK should encourage the public to participate in project or initiative related discussions, recognizing that people who take the time to participate feel it is worth the effort to join the discussion and provide feedback.

• Clarity in Potential for Influence

The process should identify and communicate where and how participants can have influence and direct impact on decision making.

Partnerships

EMBARK develops and maintains partnerships with communities and community-based organizations through the activities described in this Public Engagement Plan.

Opportunities to Build Trust & Compromise

EMBARK should ensure that discussions, mainly where there are conflicting views, are structured to allow for levels of compromise and consensus that will satisfy the most significant number of community concerns and objectives. EMBARK recognizes that processes which will enable for consensus to be achieved are critical to enable public support for recommended actions.

Guiding Principles

Effective public participation should be based on the following principles:

- **Flexible:** The engagement process should accommodate involvement in a variety of ways and be adjusted as needed.
- Inclusive: EMBARK should proactively notify and engage low income, minority, and LEP populations from its service area to encourage participation from all stakeholders.
- Respectful: All feedback received should be given careful and respectful consideration.
- **Tailored:** EMBARK's public participation methods should be adapted to match local and cultural preferences as much as possible.
- **Proactive & Timely:** Participation methods should allow for early involvement and be ongoing and dynamic so participants can influence EMBARK's decisions.

- Clear, Focused and Understandable: Participation methods should have a clear purpose and use for the input, and should be described in language that is easy to understand.
- **Trustworthy:** Information provided should be accurate and trustworthy.
- **Responsive:** EMBARK should strive to respond and incorporate appropriate public comments into transportation decisions.
- Transparent in Impact: EMBARK should communicate the results of the public's input in terms of the impact on decisions at a broad summary level, providing the major themes, the conclusions reached and rationale for the decisions.
- Authentic & Meaningful: EMBARK should support public participation as a dynamic and meaningful activity that requires teamwork and commitment at all levels of the organization.

Identification of Stakeholders

Stakeholders are those who are either directly or indirectly affected by an outreach effort, system or service change plan or recommendations of that plan. Stakeholders include:

Board of Trustees –The governing body for trust, their role is to establish policy and direction for EMBARK. Three members serve by position – the Mayor of Oklahoma City, the City Manager and the City Finance Director – and five trustees are appointed by the Mayor and approved by City Council. One of the five members must live outside the city limits of Oklahoma City. In accordance with the inter-local operating agreement between the Trust and the City, the Administrator of EMBARK is appointed by the City Manager and approved by the Board of Trustees.

The Board defines the organization's mission, establishes goals and expectations, approves service plans, sets fares, and approves the budget to accomplish the goals. The 8-member Board of Trustees meets on the first Friday of each month in the City Council Chambers. Board meetings allow for communication among the trustees, administrator, staff, and residents.

Transit Customers

- EMBARK Bus Fixed-Route and Commuter services
- EMBARK Plus ADA paratransit services
- EMBARK Vanpool
- Ferry Transit Services Oklahoma River Cruises
- Bike Share Spokies
- OKC Streetcar

Other transit services provided or sponsored by EMBARK

Other audiences include:

- Minority Populations
- Limited English Proficiency (LEP) Customers
- Low-Income Customers
- Residents
- Students
- Local Jurisdictions
- Private Businesses or Organizations
- Employers
- Partner Agencies
- Government Stakeholders

Public Engagement Approach

EMBARK's PEP allows the opportunity for the public to be involved in all phases of the public comment process by providing complete information, timely public notice, the opportunity for making a comment, and full access to key decisions.

Outreach Efforts

EMBARK takes pride in its work to maintain a collaborative relationship with the community and its stakeholders. EMBARK's public outreach effort rests on utilizing multiple communication channels to distribute information to, and solicit input from, affected constituencies. EMBARK typically communicates with the public and its customers through one or more of the following methods.

1. Types of Outreach

- Public Comment is used when EMBARK has developed a new policy, regulation, or procedure, and public input is sought. Topics are open for public comment for at least 30 days.
- Open House/Forum is used when no set agenda or presentation takes place. Participants engage with informal exhibits and staff. Opinions, comments, and preferences are encouraged may be provided orally or in writing to staff.
- Workshop is used to inform and solicit input on a particular policy, issue, plan, or project. Materials and agenda are prepared and posted in advance. No formal action is taken at a workshop.
- Community Meeting is used to inform and or seek input on a specific topic. Community meetings are conducted by staff or a facilitator.

 Materials and agenda are prepared and posted in advance. Decision-

making officials may or may not be present.

- Public Hearings is used to formally inform and or seek input on a specific topic. Staff or a facilitator conducts community meetings. Materials and agenda are prepared and posted in advance. Decision-making officials are present and decisions may be rendered at the conclusion of the hearing.
- Committee Meeting is used to inform and or seek input on a specific topic. Community meetings are conducted by staff. Materials and agenda are prepared and posted in advance. Decision-making officials may be present.
- Board Meeting is used to conduct official Trust business. Senior staff members present reports and answer questions concerning programs. All board meetings include a time for the public to comment. Only board members participate in voting. Materials and agenda are prepared and posted in advance.
- 2. Meeting Times, Locations, and Accessibility All of EMBARK's formal outreach meetings are conducted in facilities that are accessible to persons with disabilities and to people who rely on public transit. Formal outreach meetings will be an open format, held at various times and locations throughout the service area to maximize attendance.

3. Public Notices

Legal public notices will be published for any of the above formal outreach efforts where public input can impact decisions being made about the stated subject.

Public notices will be promoted at least 7 calendar days and not more than 14 calendar days in advance of set dates for: Public comment periods, Open houses or Forums, Workshops, and Community Meetings.

Legal notices for Board and Committee meetings will adhere to the requirements as outlined in the Oklahoma Open Meetings Act.

Legal notices for Public Hearings will adhere to timelines established in EMBARK's Major Change Policy.

Public notices will be:

- published in a newspaper of general circulation and relevance to impacted audiences within the EMBARK service area when possible. The official advertisement will be published as a display advertisement in the nonlegal section of the appropriate news outlet;
- posted on EMBARK's social media channels and website relevant to the mode impacted;

o posted at the Transit Center and onboard vehicle (s) of the affected mode.

4. Communication Methods

a. Website

EMBARK maintains a comprehensive parent website for all of its family of services – embarkok.com. This site is updated regularly and is home to bus route and schedule information, bus stop listings, system maps, other transit options, disability, and accessibility information, as well information pertinent to projects, plans and outreach efforts. The site also includes a Title VI and ADA page aimed at educating the public about our Title VI and ADA programs. Additionally, public notices of all EMBARK public meetings, public hearings, community meetings, open houses, workshops, and public comment periods are posted on this site. Some programs and projects may have dedicated landing pages (or micro-sites) that include information about upcoming meetings, fact sheets, and projects and plans. Embarkok.com includes the ability for users to translate pages into 90 different languages using Google Translate.

b. Customer Comments

There are multiple ways that individuals can provide verbal or written comments about any subject to us. Comment Cards are supplied at all community meetings, open houses, workshops, public hearings, and public meetings. The EMBARK website has multiple mechanisms to receive comments including a comment form, an email button that automatically begins an email to the Agency, comment forms on project pages, mailing address, and the Customer Service phone number where staff will take comments over the phone. Written public comments can also be submitted to staff at the Customer Relations window at the Downtown Transit Center located at 420 NW 5 St.

c. Social Media:

EMBARK's Facebook and Twitter pages, and EMBARK's website provide two-way communication with customers to deliver messaging and information regularly. EMBARK has social media pages and websites for its family of services. They include:

	Bus	Streetcar	Ferry	Bike Share
Website	embarkok.com	okcstreetcar.com	okrivercruises.com	spokiesokc.com
Facebook	@embarkok	@okcstreetcar	@okrivercruises	@spokiesokc
Twitter	@embarkok	@okcstreetcar	@okrivercruises	@spokiesokc
Instagram	@embarkokc	@okcstreetcar	@okrivercruises	@spokiesokc
LinkedIn	@embarkok	-	-	-
Nextdoor	@embarkok	-	-	-

d. Customer Relations

- Customer Relations Window at Transit Center
- (405) 235-RIDE (7433)
- TTY 711

e. Paid Advertisements

To promote its services or collect public comments, EMBARK may place paid advertisements in local printed or online publications or websites. Advertisements will be in publications most appropriate for reaching the impacted audiences. Print publications may include The Oklahoman, OK Gazette, Black Chronical, El Nacional, and Dan Quyen.

f. Focus Groups

At times, the complexity of a project, controversial issues, or the reality of having multiple large Title VI groups to address may require engaging targeted audiences of stakeholders.

g. Printed Materials

EMBARK produces publications as needed such route and schedule book, maps, brochures, rack cards, and posters, and makes them available to anyone. These publications include technical and policy information and often use visualization techniques to enhance understanding of transit planning and use. Materials are translated into other languages, as needed. All publications are available free of charge.

h. Community Events

Occasionally, EMBARK will participate in community events and public gathering spaces to raise awareness of our services and/or promote ridership.

i. News Releases & Media Relations

EMBARK distributes news releases as appropriate on events and other important information to news media. Press releases are posted on embarkok.com. Also, EMBARK's Public Information Officer(s) (PIO) is available to speak with reporters regarding various topics.

j. Direct Mail, Emails, and Canvassing EMBARK regularly provides information about its services through direct mailings, emails, and neighborhood canvassing to targeted households.

k. Surveys

EMBARK may conduct surveys in print, by phone, in-person, and or online to collect public opinion on specific topics or issues. Depending on the

data being collected, EMBARK considers the methodologies that provide statistically valid data when possible. Surveys are available in English and Spanish, to increase the response rate from low income, minority, and LEP populations.

5. Visualization

EMBARK uses visualization techniques such as maps, charts, graphs, illustrations, presentations and videos at all types of meetings, including board meetings, to explain concepts behind actions and decision-making. EMBARK may also use handouts and posters to display visual information. EMBARK's boardroom is equipped with computers, projectors, and sound systems for displaying visual and audio information. EMBARK uses style guides for data presentation and PowerPoint presentations to present a consistent, streamlined, and easy to understand the visual message.

6. Strategies for Engaging Individuals with Limited English Proficiency (LEP) EMBARK will take reasonable steps to ensure that LEP persons receive the language assistance services necessary by translating "vital" written materials.

Vital documents are defined either as:

- 1. any document that is critical for obtaining services and benefits, and/or
- 2. any document that is required by law. The "vital" nature of a document depends on the importance of the information or service involved, mainly the consequence to the LEP person if the information is neither accurate nor timely.

The designation of a document as "vital" may not mean that a word-for-word translation of that document will be required. In some cases, a vital document may be translated by providing a summary of the critical information in the document. In other cases, notice of the availability of language assistance services may be sufficient.

- a. Language Translation Services
 - EMBARK staff will work to identify the specific language services that community members may expect to be provided. When EMBARK is hosting public meetings in a particular geographic area with a known, significant LEP population, the following should be done:
 - a. Meeting notices should be produced and distributed according to the language translation threshold identified in the EMBARK LEP Plan, encouraging community members to participate. Also, participants can request interpreter services 48 hours in advance of the meeting, if needed; and
 - b. EMBARK will provide at least one qualified interpreter at these meetings who are fluent in the designated LEP language(s).
- b. Print Advertisements

- c. One-on-One Assistance through Outreach Efforts
- d. Website Information with Google Translate option
- e. Direct Mail

Response to Public Input

All public comments are provided to the Board of Trustees before decision making. A summary report is compiled, as well as the availability of all individual comments either in electronic form or hard copy. Summary reports are also posted on the EMBARK website.

Conclusion

EMBARK understands the importance of reaching under-represented populations, both as part of its commitment to being a valued community partner and in recognition of the significant proportion of its customer base which is included in these populations. It is necessary to establish procedures that allow for, encourage, solicit and monitor participation of all stakeholders in the EMBARK service area to ensure proactive public involvement in the planning process. The goal of this public engagement plan is to have significant and ongoing public involvement, by all identified audiences, in the public participation process for major agency outreach efforts.