

**2022 TITLE VI SUBMITTAL
FROM THE
FORT WAYNE PUBLIC TRANSPORTATION
CORPORATION/CITILINK**

Revised May 18, 2022

**Fort Wayne Public Transportation Corporation
801 Leesburg Road
Fort Wayne, Indiana 46808
(260) 432-4977**

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INTRODUCTION

The Fort Wayne Public Transportation Corporation, d/b/a Citilink, is a recipient of Federal Funds through the U.S. Department of Transportation’s Federal Transit Administration (FTA). As part of its eligibility to receive this financial assistance, Citilink is required to implement various actions as prescribed by the laws that govern the distribution of these funds. One such requirement is the development and maintenance of a program of compliance with Title VI of the Civil Rights Act of 1964, as amended. The regulatory procedures are further detailed in 49 USC Chapter 53, and FTA Circular 4702.1B.

Purpose of this Report

Citilink prepared and submitted its original Title VI Program in December, 1997. The report was approved by the FTA in 1998. Citilink has been obligated to review and summarize compliance with its Title VI Program every three (3) years. On October 1, 2012 the FTA published updated Title VI Requirements and Guidelines for Federal Transit Administration Recipients. This submission provides information compliant with the FTA Circular C4702.1B.

Description of the Citilink Transit System

Citilink operates fixed-route bus service and demand-response complementary ADA paratransit service Monday through Saturday within the cities of Fort Wayne and New Haven, Indiana. Service hours are 5:30 a.m. to 9:30 p.m. weekdays, and 7:45 a.m. to 6:15 p.m. on Saturdays. The peak-period fleet requirements are 25 buses for fixed-route service and 15 paratransit vehicles for the ADA service.

The 2020 Census information identified a total population in the City of Fort Wayne of 263,886 (including the city of New Haven the total population for the Citilink service area is 279,469). The percent change in population 2010-2020 was a 4.1% increase. 15% of the population of Fort Wayne is Black or African American and 9.1% are Hispanic or Latino. Approximately 10,000 residents are Burmese, the largest population of Burmese in the world outside of Burma (Myanmar), accounting for 3.7% of Fort Wayne’s population. The table below shows a slight increase in the percentage of our population that identifies as Asian or “two or more” races.

Race	2010 Census	2020 Census
White	73.6%	72.0%
Black	15.4%	15.0%
Asian	3.3%	5.0%
Two or More Races	0.5%	5.1%

Other demographic characteristics relating to English proficiency are provided later in this report.

ANALYSIS OF THE TITLE VI PROGRAM

The items evaluated below reflect the fact that Citilink operates fixed-route transit service with less than 50 vehicles during peak demand periods. The analysis includes data in effect through December 31, 2021, which is the third year of the reporting cycle.

1. Title VI Notice to the Public

The Title VI Notice to the Public is included as **Exhibit “A”** of this report. This notice is permanently posted in English at the following locations:

1. Each Citilink owned facility in the customer service areas as well as employee areas (5 postings).
2. Every Citilink owned transit bus (51 postings)
3. Citilink Website: <https://www.fwcitilink.com/title-VI.php>

(Also available translated into Spanish & Burmese on the website under Title VI information <https://www.fwcitilink.com/title-VI.php>)

4. Referenced in the Citilink Access Ride Guide, Citilink Service Standards, and other printed materials as appropriate.

The notice is available translated into Spanish, Burmese, large print and other formats upon request. It was updated in 2015 to include sexual orientation protections.

2. Title VI Complaint Procedures

Title VI Complaint Procedures, i.e., instructions to the public regarding how to file a Title VI discrimination complaint, is included as **Exhibit “B”** of this report. This document is available on our website and from Customer Service representatives translated into Spanish and Burmese.

2a. Title VI Complaint Form

Title VI Complaint Form is included as **Exhibit “C”** of this report.

3. Transit-related Title VI Investigations, Complaints, and Lawsuits

Citilink has received no Title VI complaints of discrimination on the basis of race, color National origin, age, disability, sex, sexual orientation, gender identity, religion, low-income status or limited English proficiency regarding participation in, or benefit of, transit-related activities and programs in 2021. There are no pending complaints from previous years.

4. Public Participation Plan

Citilink has made no major service changes since 2015.

A copy of NIRCC's Public Participation Plan as amended in 2019 accompanies this report as **Exhibit "D"**. Also attached under Exhibit "D" is a survey form that is used by Citilink, NIRCC and other transportation providers in our area to collect demographic information about participants in various public meeting/hearing/open house. Participation in the survey is voluntary.

Public Participation meetings are often held in low income/multicultural neighborhood centers (Urban League) and/or centrally located in a common area (Main Library) to accommodate all. Locations are ADA accessible and well served by public transit. Time of the day is selected to accommodate maximum participation (generally early evening). Translated materials and services can be made available upon request. The public input process is informed by the four factor analysis and outreach plans associated with the updated Language Assistance Plan (Exhibit E).

Citilink has partnered with the regional Metropolitan Planning Organization (MPO) the Northeast Indiana Regional Coordinating Council (NIRCC) to perform the public participation requirements associated with the development of their long range Transit Improvement Plan (TIP) and Program of Projects (POP) in conjunction with their transportation planning public notice/participation process. Passenger and general public surveys and public input sessions regarding public transportation are conducted by Citilink, NIRCC and Fort Wayne City Planning in conjunction with updating community transportation plans (Transportation Development Plan, Coordinated Transit-Human Service Plan, Bus Fort Wayne Plan, long range transportation planning, etc.

Citilink staff participates (as member and often presenter) in numerous monthly outreach meetings targeted to engage minority and Limited English Proficient populations (LEP) (Multicultural Council, Human Service Council, Hispanic Service Provider Network, Urban League, Burmese Advocacy Center, NE Indiana Disability Coalition, Neighborhood Associations, etc.). Citilink Operations and Administrative staff visit with riders on the bus and at our Central Station on a regular basis. Street Supervisors and Customer Service Staff report comments and suggestions via our Customer Comment Database and email with all relevant staff to ensure that rider input is recorded and addressed.

Notification of meetings, like essential service information and media alerts, is widely distributed to an extensive list of media, human service, education, public official, transit advocates and riders via print, electronic and social media outlets.

5. Language Assistance Plan

Citilink's Language Assistance Plan (LAP) is included as **Exhibit "E"**. This includes results of the Four Factor Analysis, description of available resources, employee training, and program evaluation to provide language assistance to limited English proficiency (LEP) persons.

6. Membership of Non-elected Committees and Councils

The Fort Wayne Public Transportation Corporation's seven (7) member Board of Directors is comprised of the following:

Chair	White Female	City Planner
Vice-Chair	Black Male	Fort Wayne City Council Member
Secretary	White Male	CPA
Member	White Male	Attorney
Member	White Female	Pastor
Member	Asian Female	Community Development
Member	White Female	Disability Services

The board is appointed by the Mayor and City Council and not selected by Citilink. Thus the transit system's ability to impact representation on this board is minimal. Board meetings are held on the 3rd Thursday of each month at 5:30PM at our administrative offices that are well served by our system. Additional transport arrangements can be made upon request. As stated above, the MPO (NIRCC) also convenes regular Transportation Advisory Group and Transportation Planning Council meetings regarding public transit issues that are open to the public. Further, Fort Wayne City Council reviews the Citilink budget annually providing yet another opportunity for public input. Citilink convenes Service Advisory Roundtables quarterly to share information and obtain feedback. Passengers, advocates, human service agency staff are invited to attend. Efforts are made to encourage minority participation.

7. Sub-recipient Title VI Compliance Monitoring

Since the inception of the New Freedom program Citilink has served as the designated recipient for this funding which has been passed through to the Community Transportation Network (CTN) as a sub-grantee. With the end of New Freedom and the modification of the 5310 program to provide for pass-through operating assistance, CTN has continued to receive funding for door-to-door, non-emergency medical transport that exceeds the geographical boundaries and service limitations of the Citilink Access paratransit service. The regional MPO, NIRCC, administers the competitive selection process for the use of New Freedom/5310 funding. Through that process CTN has received Sec. 5310 capital assistance in recent years. CTN has certified in their application and contract to comply with all applicable federal, state and local funding requirements. Annual oversight monitoring of CTN conducted in May 2022 indicated the Title VI program no longer existed or was not familiar to new executive leadership at CTN, even though such programs had been previously submitted to Citilink (correction is in progress).

8. Facility Location Title VI Equity Analysis

Citilink has not been involved in any projects involving land acquisition or the displacement of persons that would require a NEPA or Title VI Equity Analysis during this three year reporting period, nor are any such projects planned for the future.

9. Review and Approval of the Title VI Program and This Report

The Fort Wayne Public Transportation Corporation board amended the Title VI Notice to the Public, and associated documents, during the October 8, 2015 board meeting to come into compliance with Indiana Department of Transportation recommended language and the City of Fort Wayne Title VI policy. The board last reviewed this Title VI Program Report at the July 11,

2019 meeting and approved the submission. This submission will be presented to the Board at its June 2022 meeting and documentation of board approval will be included as **Exhibit “F”**.

Additional Information Requirements for systems with fewer than 50 vehicles in peak service:

The standards listed below are those required by the current Title VI Circular FTA C4702.IB. These standards, and others included as **Exhibit “G”**, are included the Citilink Transit Development Plan of 2020 and the Citilink Service Standard guidance adopted by the board in August, 2014.

Required Service Standards

1. Vehicle Load Factor/Loading Standards:

The loading standards for Citilink routes should be a maximum average load factor of 1.2 (120%) during the weekday peak periods, and 1.0 (100%) at all other time periods. For individual trips, this should not be exceeded for time periods greater than 15 minutes. (p. 87 of TDP Chapter 5)

Passenger comfort and the ability to attract additional riders requires an assessment of load conditions to determine the possible need for additional service. Maximum loading standards ensure that most passengers will have a seat for at least the majority of their trip. The maximum average load factor is calculated by dividing the total number of passengers passing the maximum load point by the number of seats passing the maximum load point during the operating period being considered. Since this is an average, individual trips may exceed the standard.

Total passenger trips were 1,285,806 in 2021. Average weekday ridership per route is reviewed by the Citilink board on a monthly basis. In 2021 individual route ridership ranged from 2 to 16 passengers/hour for fixed route services. Ridership is down slightly over the past couple of years due to the pandemic, thus overcrowding is less of an issue.

2. Vehicle Headway/Frequency of Service:

The maximum headway between scheduled fixed-route buses should be 60 minutes off-peak and 30 minutes in peak service.

The frequency of service influences the attractiveness of transit travel to potential riders. The 60 minute maximum headway, while not altogether the most desirable, recognizes the financial constraints at Citilink. The routes frequency should correspond to demand. Some routes may only operate during the weekday peak period while others may run at all times with relatively high frequencies. Maximum policy headways of 60 minutes for off-peak Radial, Cross-town, and Connector routes should not be exceeded if the route is to be operated. The maximum peak period standards of 30 minutes should only be implemented if sufficient ridership and funding exists. Headways should conform to regularly recurring clock intervals.

Currently, all routes operate on at least 60 minute headway. Three routes (4, 7 & 8) operate on 30-minute headways.

3. On-time Performance/Schedule Adherence/Reliability:

This is defined as departure from all scheduled time points not earlier than zero (0) minutes and not later than five (5) minutes of the published schedule.

<u>Category</u>	<u>% between 0 and 5 minutes late</u>
Good	90%
Satisfactory	85-90%
Marginal	80-85%
Unsatisfactory	less than 80%

Reliability deals with the rider’s confidence in the bus arriving on time throughout the transit system. Surveys reflect that reliability is a most important factor in determining user attractiveness and satisfaction with the transit system. Reliability is an especially important factor when the interval between fixed-route buses is greater than fifteen (15) minutes.

The Citilink board monitors on-time performance on a monthly basis. Average on-time performance for fixed route buses in 2021 was greater than 95% for Access paratransit and fixed route service. As the service operates on a pulse system with relatively long headways it is sometimes necessary to delay all buses at the station to allow for successful transfer; further, weather, construction, accidents, emergencies, etc. all affect reliability.

4. Service Availability/Route Spacing:

The distance between routes will be guided by population density and automobile availability according to the standards in the table below.

Automobiles Per household	Density (persons per square mile)			
	Over 5,000	2,501 to 5,000	1,000 to 2,500	Under 1,000
Under 0.40	¼ mile	¼ mile	3/8 mile	½ mile
0.40-0.80	¼ mile	3/8 mile	½ mile	1 mile
0.81-1.50	3/8 mile	½ mile	1 mile	*
1.51-2.00	½ mile	½ mile	*	*
Over 2.0	1 mile	*	*	*

Route coverage measures the potential for people to use transit based on their proximity to service. Routes should be designed so that the number of people with access to the system is maximized.

On average the City of Fort Wayne has a population density of 2,272.1/square mile (2020 census); this is a higher density than the largest transit system in the state, Marion County/Indianapolis IndyGo, service area. The number of automobiles per household is about 1.8, on average. Thus our goal is to have fixed route service available, on average, within ½ mile of most households.

Required Service Indicator Policies

1. Transit Passenger Amenities:

Passenger amenities and information are an important part of the service standards review of a transit network. These facets of Citilink operation relate to the user-friendly nature of the service provided. This is an important element of a transit network as a service provider.

a. Seating/Shelters Waiting Comfort:

Bus stops with more than 50 passengers boarding on a daily basis should have a bus shelter. Benches should be provided at bus stops with more than 25 passengers per day.

In addition, since a large percentage of Citilink passengers transfer, passenger amenities should be provided at all major transfer locations. Special facilities may be provided, if necessary, as hospitals and clinics. These key bus stops should have bus shelters or other means of weather protection for passengers. Schedule information for all routes should be displayed or available to passengers.

Citilink has developed a map indicating key origin and destination stops as well as route transfer points. Boarding and alighting studies provided valuable information regarding bus stop usage. Bus stop information is being updated in conjunction with the implementation of our Double Map real time bus tracking system as well as an updated accessibility survey of our bus stops in response to PROWAG (public right of way ADA) standards.

In 2021 Citilink terminated its contract with a private company to provide bus shelters and acquired some 70 bus shelters from the prior provider. Citilink is developing an agreement with the City of Fort Wayne Public Works/Right-of-Way Department to provide exclusive control of bus stop infrastructure in the public right of way. The previous contractor located shelters purely for the purpose of selling advertising, and this did not meet transit needs. Going forward, Citilink will have control of bus stop infrastructure.

b. System Information Availability:

Route & Schedule brochures are available upon request from bus drivers and from Citilink customer service representatives. They are displayed and made available at the transfer facility and a number of other employment and activity centers throughout the city as determined appropriate by Citilink staff. System information is available in translated and accessible formats.

Citilink Central Station is equipped with real time electronic signage and this information is made available to the public via the website and Double Map app. This provides real time information at bus stops and anywhere passengers have access to a computer or smart phone.

c. Escalators/Elevators:

Not applicable

d. Waste Receptacles:

Waste receptacles are provided at Citilink facilities as necessary including Central Station and at bus shelters.

Citilink owned bus shelters are equipped with waste containers which are emptied on a regular schedule. Recycling bins are available with each trash can in individual work areas in our offices and in the waiting area of our Central Station.

2. Vehicle Assignment:

Bus assignments are matched appropriate to the operating characteristics of the route. Lower ridership routes are assigned smaller buses. Flex routes, requiring route deviation, and tight turns on narrow streets, are operated with smaller light duty transit buses.

Citilink continues our efforts to replace fixed route buses with low-floor Gillig buses. We now have 30 in our fleet with five replacement buses arriving in June 2022. Additionally, Citilink operates 6 mini-buses in deviated fixed route service and 17 mini-buses for Access. The fleet is aging, and 12 buses need to be replaced (these have been ordered but delayed by the manufacturer due to supply chain problems). All buses are lift or ramp equipped.

Additional service standards contained within our Chapter 5 of our Transportation Development Plan and adopted system Service Standards are included as **Exhibit “G”**.

Exhibit A



Title VI Civil Rights Notice to Public

The Fort Wayne Public Transportation Corporation (Citilink) is committed to ensuring that no person is excluded from participation in, denied the benefits of, or subjected to discrimination under any of its services on the basis of race, color, national origin, age, disability, sex, sexual orientation, gender identity, religion, low income status or limited English proficiency, as provided by Title VI of the Civil Rights Act of 1964 and all related acts and statutes.

It is Citilink's objective to:

- **Ensure that the level and quality of transportation service is provided to all persons;**
- **Promote the full and fair participation of all affected populations in transportation decision making;**
- **Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;**
- **Ensure meaningful access to programs and activities by persons with limited English proficiency.**

Citilink is committed to a policy of non-discrimination in the conduct of its business; including, adherence to Title VI responsibilities and the delivery of equitable and accessible transportation services. Any person who believes that he or she has been subjected to unlawful discrimination may file a Title VI complaint with Citilink.

Any such complaint must be in writing and submitted to the Citilink Title VI Coordinator within one hundred eighty (180) days following the date of the alleged occurrence. A Title VI Civil Rights/ADA Complaint Form is available by calling (260)432-4546 or from our website fwcitilink.com. To submit a complaint or if information is needed in another language contact:

**Citilink Title VI/ADA Coordinator
801 Leesburg Road, Fort Wayne
Indiana, 46808**

Exhibit B



Title VI Civil Rights Complaint Procedures

The Fort Wayne Public Transportation Corporation/Citilink hereby gives public notice of its policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964 and all related acts and statutes. Title VI and related statutes prohibiting discrimination in Federally assisted programs require that no person is excluded from participation in, denied the benefits of, or subjected to discrimination under any services on the grounds of race, color, national origin, age, disability, sex, sexual orientation, gender identity, religion, low income status or limited English proficiency.

Any person who believes they have been aggrieved by an unlawful discriminatory practice regarding Citilink services has a right to file a formal complaint with Citilink. Any such complaint must be in writing and submitted to the Citilink Title VI/ADA Coordinator within one hundred eighty (180) days following the date of the alleged occurrence.

A Title VI Civil Rights/ADA Complaint Form is available. For more information regarding civil rights complaints, please contact: Citilink (260) 432-4977 or visit our website www.fwcitilink.com

If any person believes that Citilink has not followed this commitment, please contact the Citilink Civil Rights/ADA Coordinator:

Citilink
Attn: Civil Rights Coordinator
801 Leesburg Road
Fort Wayne, Indiana, 46808
(260) 432-4977

Investigation protocol is as follows:

- Receive complaint within 180 days of alleged discriminatory act
- Respond in writing to complainant to inform them that their complaint is outside our jurisdiction within 48 hours or requesting additional information
- Initiate investigation within 5 business days of receiving necessary information
- Information must be received from the complainant within 30 days from the request for information or the case will be administratively closed

- Review allegation/charge and relevant elements (engage corporate attorney for assistance/participation as necessary)
- Witness interviews are arranged. Citizens, employees, etc. are interviewed and information documented
- Upon completion of the review, a letter of finding summarizing the allegations, decision and any relevant actions will be sent to the complainant
- If the complainant wishes to appeal the decision, they have 30 days after the letter of finding to do so in writing
- The appeal must include an explanation of your dissatisfaction with the decision and signed
- Written decision regarding the appeal will be sent within 30 days
- Confidentiality will be maintained unless disclosure is authorized by the complainant or required by law.

Exhibit C



Title VI Civil Rights/ADA Complaint Form

The Fort Wayne Public Transportation Corporation (Citilink) is committed to ensuring that no person is excluded from participation in, denied the benefits of, or subjected to discrimination under any of its services on the basis of race, color, national origin, age, disability, sex, sexual orientation, gender identity, religion, low income status or limited English proficiency, as provided by Title VI of the Civil Rights Act of 1964 and all related acts and statutes.

Section I

Name: _____

Address: _____
Street City State Zip

Telephone Numbers: Home: _____ Work: _____ Other: _____

E-Mail Address: _____

Accessible Format Requirements?

Large Print: Yes _____ No _____ Audio Tape: Yes _____ No _____

TDD: Yes _____ No _____ Language Translation: Yes _____ No _____

Other: _____

The Federal Transit Administration (FTA) Office of Civil Rights is responsible for civil rights compliance and monitoring, which includes ensuring that providers of public transportation properly abide by Title VI of the Civil Rights Act of 1964, Executive Order 12898, "Federal

Actions to Address Environmental Justice in Minority Populations and Low Income Populations”, and the Department of Transportation’s Guidance to Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries.

Section II

Are you filing this complaint on your own behalf? Yes _____ No _____
(If you answered “yes” to this question, go to Section III)

If not, please supply the name and relationship of the person for whom you are complaining:

Name: _____ Relationship: _____

Please explain why you have filed for a third party. _____

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

Section III

I believe the discrimination I experienced was based on:

- Race Color National Origin
- Other non-Title VI basis (e.g. income, disability, sex, etc. please describe below):

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

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

Section IV

Have you previously filed a Title VI complaint with Citilink/FWPTC? Yes _____ No _____

Section V

Have you filed this complaint with any other agencies? Yes _____ No _____

(If you answered yes, who did you file the complaint with?)

Federal Transit Administration: _____ U. S. Department of Transportation: _____

Indiana Dept. of Transportation: _____ Department of Justice: _____

Equal Employment Opportunity Commission: _____ Federal Court _____ State Court _____

Have you filed a lawsuit regarding this complaint? Yes _____ No _____

If yes, please provide a copy of the complaint form/lawsuit. Please provide information about a contact at the agency/court where the complaint was filed.

Name _____ Title _____

Agency _____ Address _____

Telephone _____

Section VI:

Complaint is against: _____

Contact Person: _____ Title: _____

Telephone Number: _____

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

Signature (required) _____ Date (required) _____

(Note: We cannot accept your complaint without a signature)

Please mail your completed form to:

Title VI/ADA Coordinator
Citilink/FWPTC
801 Leesburg Road
Fort Wayne, IN 46808

Exhibit D

Public Participation Plan

July 2019

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Introduction

The Northeastern Indiana Regional Coordinating Council (NIRCC) is the agency designated by the Governor of the State of Indiana to perform general purpose planning on a regional basis for Adams, Allen, DeKalb, and Wells Counties. NIRCC functions not only as the regional development agency, but also as the Intergovernmental Review Agency for this multi-county area. In addition, NIRCC serves as the Metropolitan Planning Organization (MPO) for the Fort Wayne-New Haven-Allen County Urbanized Area.

The Northeastern Indiana Regional Coordinating Council as the Metropolitan Planning Organization is charged with performing comprehensive transportation planning in the Urbanized Area. Under the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) regulations, the metropolitan transportation planning process must occur in an atmosphere of public involvement and participation. The regulations state that each “MPO shall develop and use a documented participation plan that defines a process for providing citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with reasonable opportunities to be involved in the metropolitan transportation planning process.”

The objective of the Participation Plan is to provide a process that assures these reasonable opportunities are afforded to all interested parties. The metropolitan planning process administered by the Northeastern Indiana Regional Coordinating Council provides these opportunities for participation through a variety of activities and information sharing techniques. This document will discuss the participation opportunities.

Environmental Justice

Environmental justice is a political and social concept that ensures that all citizens receive fair and just treatment under the implementation of government policies. Environmental justice is in place to ensure that all citizens (regardless of ethnic background or socioeconomic standing), the environment, and the communities that we live in, are all treated with equal respect.

There are three functional principles to Environmental Justice with regards to transportation planning:

1. To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Through the transportation planning process followed by NIRCC these aspects of environmental justice are followed very closely. NIRCC does not practice the selection of project sites as to the affluence of the area or neighborhood of which they are located. The social and environmental impacts are also weighed against the project benefits at several phases in the transportation planning process, to ensure policies, benefits and project impacts are equitably applied. All projects are given equal consideration throughout the entire planning process.

Public input and participation is especially encouraged at this point in the decision making process particularly by those persons traditionally underserved by existing transportation systems such as low-income or minority households and the elderly. The continuous interaction between these groups and transportation (planning) professionals will be critical to serving their future needs. The increased involvement of the diverse incomes, ethnic backgrounds, and age groups will only help to strengthen the public participation process, the overall transportation planning process, and the neighborhoods and communities of the area.

The Northeastern Indiana Regional Coordinating Council is committed to developing the participation plan in consultation with all interested parties in the transportation planning process. This involves special outreach to minority groups and low-income citizens of the community. Through several minority and low-income community leaders and neighborhood representatives, NIRCC maintains a strong affiliation with these residents of the community. NIRCC will continue to make it a priority to maintain a strong

affiliation with minority and low-income groups to ensure that their opinions are heard, and that they plan an active role in the transportation planning process.

The primary components of the participation plan include: open board and committee meetings; public and agency participation meetings; meetings with neighborhood representatives; transportation planning briefs; information assistance; visualization activities and techniques; posting of information and documents on the World Wide Web (internet); and media relations. Notices and agendas of the board and committee meetings are distributed to individuals, interested parties, and civic organizations representing minority and low income populations. Notices announcing public and agency meetings are mailed to neighborhood association representatives, interested parties, and civic groups representing minority and low income populations.

Transportation Planners meet with neighborhood groups and civic organizations on a regular basis. The transportation planning briefs are distributed to elected and appointed officials, civic groups, and interested individuals of which some represent minority and low income populations. Information assistance and visualization activities are available to all citizens and groups. A NIRCC website (NIRCC.com) contains agency information and various documents including the Transportation Plan and Transportation Improvement Program (TIP). Information on transportation planning activities and press releases are provided to all local media including minority oriented publications.

This report documents the participation process, which has formally become a component of the metropolitan transportation planning process. This process is based on NIRCC's lengthy history of citizen participation in their transportation planning efforts that extends to all interested parties and agencies.

Participation Plan Design and Review

The remainder of this report details specific activities that encourage participation in, and provide information on, the transportation planning process. NIRCC will develop the participation plan in consultation with all interested parties. Five major activity areas where participation is afforded and occurs in the transportation planning process are discussed. These areas include Board and Committee meetings, Unified Planning Work

Program activities, Citizen and Agency Meetings, Transportation Improvement Program Process, and the Long-Range Transportation Planning Process (Transportation Plan).

These activities intertwine and overlap forming a seamless participation process. Jointly, these activities involve all facets of the metropolitan transportation planning process. In addition, NIRCC and the Indiana Department of Transportation are committed to coordinate local and statewide public participation processes. This cooperation maximizes participation including local elected officials and enhances public consideration of transportation issues, plans, and programs without redundancy and duplicate efforts.

NIRCC has consistently engaged in public participation activities as part of the transportation planning process. In 1994 the process was formally documented and made available to the public and public officials for review and comment. A comment period preceded the adoption of the public participation process. The Public Participation Process was reviewed and evaluation in 1996 and 2001. Modifications were made as a result of these reviews. This Public Participation Plan has been developed and refined over the years in consultation with interested parties.

The participation process was reviewed and evaluated in May 2001 and NIRCC took a proactive approach to solicit comments on the Public Involvement Process. Surveys were sent out to over 500 representatives of neighborhood associations, civic organizations and concerned citizens within the Metropolitan Planning Area. The results of the survey were used to help evaluate and revise the participation process. A full report of the evaluation process was prepared in May 2001. NIRCC staff in conjunction with the Urban Transportation Advisory Board have evaluated and discussed strategies to improve the process. These strategies have been incorporated into the Participation Plan including SAFETEA-LU regulations.

The SAFETEA-LU Regulations specifically require that the Participation Plan provide for the following:

1. Provide adequate public notice of public participation activities and time for public review and comment at key decision points, including but not limited to a reasonable opportunity to comment on the proposed metropolitan transportation plan and the TIP;

2. Provide timely notice and reasonable access to information about transportation issues and processes;
3. Employ visualization techniques to describe metropolitan transportation plans;
4. Make public information (technical information and meeting notices) available in electronically accessible formats and means, such as the World Wide Web;
5. Hold public meetings at convenient and accessible locations and times;
6. Demonstrate explicit consideration and response to public input received during the development of the metropolitan plan and the TIP;
7. Seek out and considering the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households, who may face challenges accessing employment and other services;
8. Provide an additional opportunity for public comment, if the final metropolitan transportation plan or TIP differs significantly from the version that was made available for public comment by the MPO and raises new material issues which interested parties could not reasonably have foreseen from the public involvement efforts;
9. Coordinate with the statewide transportation planning public involvement and consultation processes; and
10. Periodically review the effectiveness of the procedures and strategies contained in the participation plan to ensure a full and open process.

In developing the metropolitan transportation plan and TIP, NIRCC will consult with other planning activities that are affected by transportation (including state and local planned growth, economic development, environmental protection, airport operations, or freight movements) or coordinate its planning process (to the maximum extent practicable) with such planning activities. In addition, the plans and TIPS shall be developed in due consideration of other related planning activities within the metropolitan area as per SAFETEA-LU.

The Draft Participation Plan was open for public comment period from March 1, 2007 to April 18, 2007. A public notice was published in local newspapers and the document was posted on the NIRCC website. Copies of the draft document were provided to agencies and agency representatives identified in Appendix B. NIRCC did not receive any substantive comments regarding the Draft Participation Plan. Several requests were received to modify agency contacts and contact information. These modifications have

been incorporated in Appendix B. The Urban Transportation Advisory Board and the Northeastern Indiana Regional Coordinating Council formally adopted the Participation Plan on May 1, 2007 and May 2, 2007 respectively.

The Urban Transportation Advisory Board and staff periodically review and evaluate the Participation Plan. The review and evaluation determines whether the intended objectives of the public involvement process are being fulfilled. Necessary modifications will be implemented. Significant revision to the public participation process will not be adopted until a comment period has been completed.

Section I

Background

Section I covers two main areas including Organizational Structure and the History of Public Participation. The topic of Organizational Structure describes how NIRCC administers and implements the metropolitan transportation planning process. The History of Public Participation demonstrates the existing level of public and elected official involvement in the planning process, on which the revised participation process will build.

Organizational Structure

The organizational structure is important for two primary reasons. SAFETEA-LU stipulates that the participation process must include citizens, public officials, affected public agencies, and representatives of transportation agency employees, private providers of transportation and other interested parties. Understanding the organizational structure and composition of the respective boards and committees makes it evident that public officials, affected agencies, private transportation providers and the representatives of transportation agency employees all participate in the transportation planning process. The second reason is that in order to understand the entire participation process, it is helpful to first understand the organizational structure, which supports the process.

The Metropolitan Planning Area (MPA) is commonly referred to as the Fort Wayne-New Haven-Allen County Metropolitan Planning Area (Figure 1). This area includes approximately 380 square miles within Allen County, and small areas of Huntington and

Whitley Counties, representing a portion of the total NIRCC regional planning jurisdiction. The MPA encompasses the Cities of Fort Wayne and New Haven, the Towns of Grabill, Huntertown, and Leo-Cedarville and a sizeable portion of unincorporated areas of Allen County.

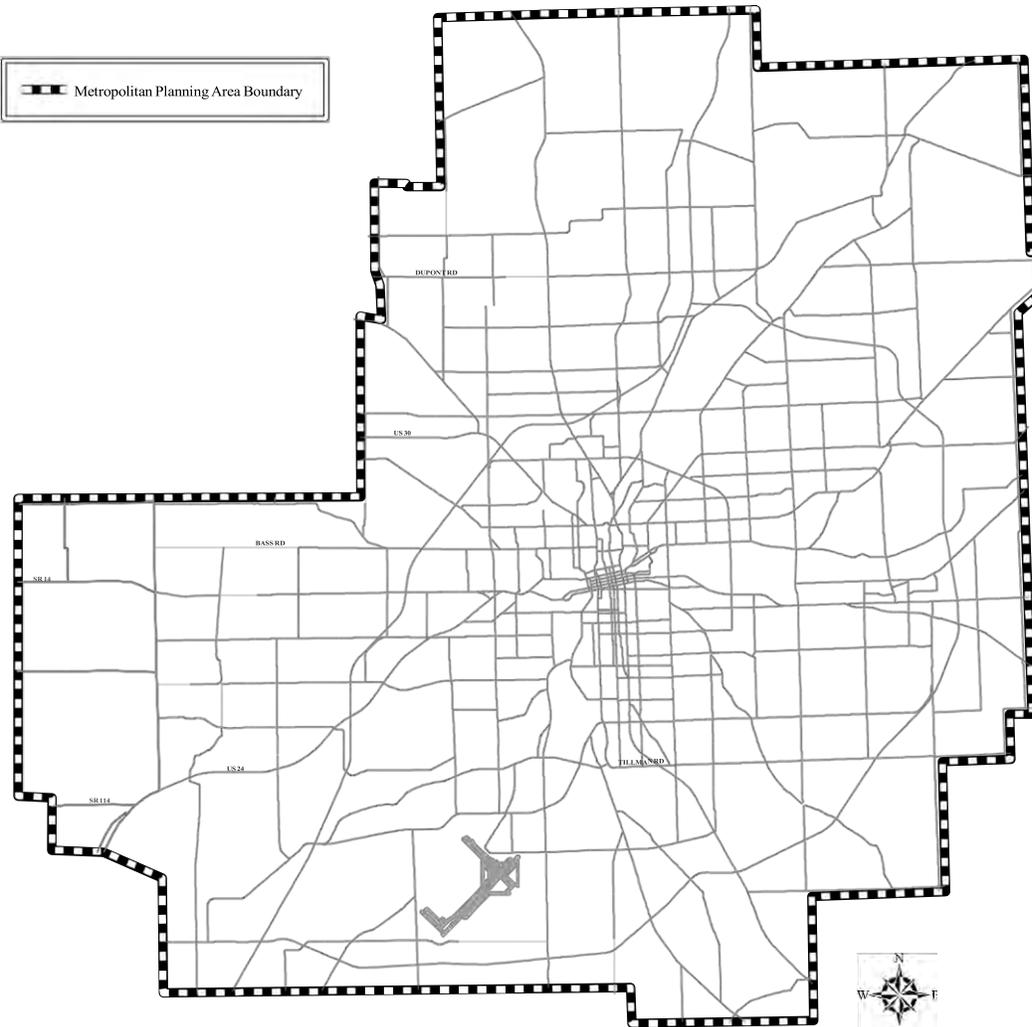
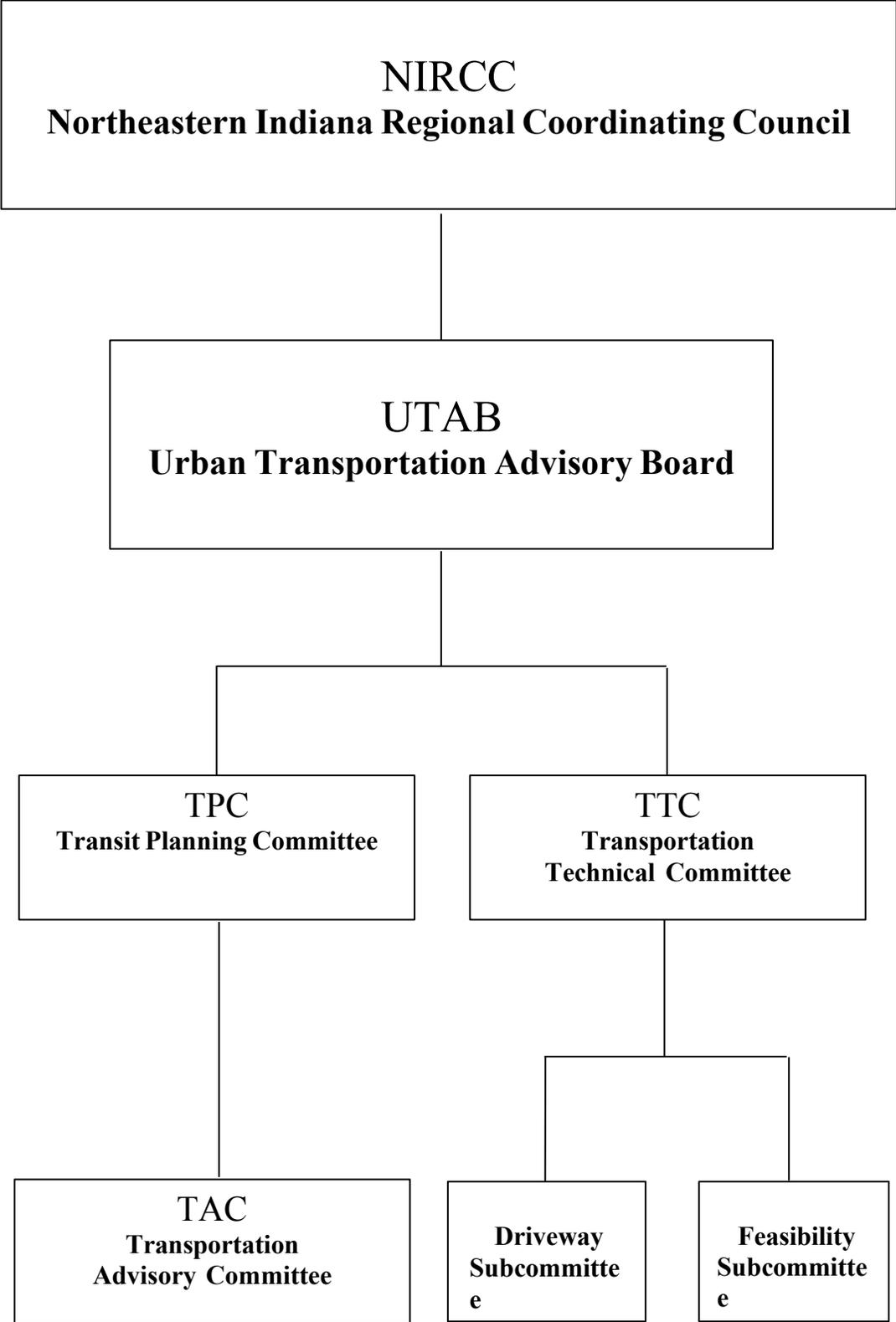


Figure 1. Metropolitan Planning Area

NIRCC was formed in 1974 and has been involved in transportation planning since its inception. NIRCC created several functional groups to assist and advise it on transportation planning issues. These boards and committees are the Urban Transportation Advisory Board (UTAB), the Transportation Technical Committee (TTC), and the Transportation Planning Committee (TPC). The Urban Transportation Advisory Board (UTAB) is the transportation policy board developed under NIRCC's authority to

administer the metropolitan transportation planning process. Figure 2 displays a flow chart of the organizational structure of NIRCC.

Figure 2. NIRCC Organizational Chart



Membership of these groups includes representatives from Allen and surrounding Counties, The Cities of Fort Wayne, New Haven, and other smaller communities, Fort Wayne-Allen County Airport Authority, Indiana Department of Transportation, and the Fort Wayne Public Transportation Corporation (CITILINK), and several additional agencies. Each board and committee is described below. Appendix A provides a membership listing of the Northeastern Indiana Regional Coordinating Council, Urban Transportation Advisory Board, Transportation Technical Committee and Transit Planning Committee.

The Urban Transportation Advisory Board (UTAB)

UTAB was established by NIRCC to assist it in matters related to transportation planning within the Metropolitan Planning Area. The major function of UTAB is to advise NIRCC on matters of policy concerning the Fort Wayne-New Haven-Allen County Metropolitan Planning Area transportation planning process.

The membership of UTAB is composed of individuals from various local governments who are in positions of responsibility and able to make policy decisions. Duties and responsibilities of the Board include the following:

1. The Board acts in the advisory capacity to NIRCC for the planning of highways, roads and public transportation within the Metropolitan Planning Area.
2. The Board acts as the policy board for policy decision required under Title 23, Section 134, of the U.S. Code.
3. The Board, with technical support from the NIRCC staff, performs functions listed under Title 23, Section 134 of the U.S. Code as specified in the Unified Planning Work Program.
4. Using the Transportation Technical Committee, Transit Planning Committee, and the NIRCC staff, the Board is responsible for carrying out the continuous transportation planning process. The responsibility includes the coordination of programs of the separate units of local government, and also includes the supplying of necessary information regarding land use, population, etc.,

needed to successfully complete the transportation work elements of the Unified Planning Work Program.

5. Working with the NIRCC staff, the Board is responsible for developing the transportation work elements of the Unified Planning Work Program.
6. The Board reviews and appoints members to the Transportation Technical Committee and the Transit Planning Committee.
7. The Board has the authority and responsibility to approve the use of Surface Transportation Program (STP) Funds and determine the implementation priority for the transportation improvement projects with the Metropolitan Planning Area.

The Transportation Technical Committee (TTC) and Transit Planning Committee (TPC)

Associated with UTAB are the Transportation Technical Committee and Transit Planning Committee, which serve as working advisory committees. Working with the staff, these committees are the agents through which transportation planning information from local governments is channeled to the planning staff. The Transportation Technical Committee oversees the day-to-day coordination activities between local governments with primary regard to highways and roads. The Transit Planning Committee oversees the day-to-day coordination activities between local governments with primary regard to public transportation. Both communities work with other modes of transportation in relation to their respective areas. Similarly, there are occasions where these two committees work jointly on projects of mutual interest.

The membership of these committees (see Appendix A) is composed of local government staff members authorized to provide planning information, offer comment, and report on transportation related activities within their agency's jurisdiction. State and federal officials participate on these committees and may hold voting or non-voting memberships. Public and private transit groups also sit as members on these committees. Duties and responsibilities of the Transportation Technical Committee and Transit Planning Committee include the following:

1. The Committees are responsible for obtaining specific planning information and data from local governments, and for working with staff to integrate this information into the planning process as specified in the transportation elements of the Unified Planning Work Program. This activity may include information as related to land use, terminal facilities, traffic control features,

zoning ordinances, subdivision regulations, building codes, etc., and financial resources and others as necessary.

2. The Committees through their subcommittees deal with and provide recommendations regarding the Site-Plan and Driveway applications, feasibility studies, Section 5310 grant applications, transit studies, etc.
3. The Committees through their subcommittees and meetings conduct coordination work activities regarding program implementation within the Metropolitan Planning Area.
4. With regard to the continuing phase of transportation planning, the Committees assist staff in developing the work elements of the various program components.

History of Public Participation

The Northeastern Indiana Regional Coordinating Council through the Urban Transportation Advisory Board has established a long history of public official and citizen involvement in the transportation planning process. Since the early 1970s, the Unified Planning Work Program has included a section dealing solely with public participation activities. Public meetings, meetings with civic groups, newsletters, and media outreach efforts have consistently been a component of NIRCC's transportation planning efforts. These activities will be discussed at greater length in the following section.

Boards and committees of the Northeastern Indiana Regional Coordinating Council and related groups hold regularly scheduled meetings. Notifications of these meetings are provided to all interested parties including news media. These meetings are always open to the public and often receive media attention.

Participation meetings are held for specific milestones in the planning process, but all comments and questions are welcomed and addressed. Meeting notices are mailed out to news media, neighborhood representatives/groups, community leaders, interested agencies and other concerned citizens. A survey questionnaire and/or comment form is often included. This survey questionnaire may discuss topics that will be addressed at the upcoming meeting or designed to stimulate comments. The survey/comment forms are to help citizens get more involved in the transportation planning process. Interested parties can submit questions and comments at the meetings or by mail/email if they are unable to

attend. Any concerned citizen, agency or interested party is also encouraged to contact the NIRCC office directly to voice opinions or comments to staff. The questions and comments are recorded and responses are prepared.

Prior to the ISTEA legislation public meetings dealing with issues related to the Transportation System Management Program have been held annually since the early 1980's. These meetings were held at various locations throughout the MPA and covered a wide range of transportation planning issues. These meetings provide direct citizen involvement and interaction in local and state transportation systems focusing primarily on highways and transit.

Comments were recorded at these meetings and staff working with the Transportation Technical Committee and Transit Planning Committee prepared responses. Simple problems were remedied quickly by the highway, traffic, or transit departments of the appropriate jurisdiction. Complex problems or issues were analyzed more thoroughly to develop viable solutions and policies. The responses were prepared and provided to the citizens who attend the meetings. The long-range transportation planning process administered by NIRCC also had a solid history of citizen participation. Citizen meetings held at various stages of plan development provided opportunity for public involvement and discussion. In addition, staff attended numerous neighborhood and civic organization meetings making presentations and soliciting comments on the development of the transportation plan. This level of public involvement over the years contributed to solid, long-range transportation plans, accepted and supported by the community.

In addition to citizen meetings on the transportation planning process and the Transportation Plan, documentation of final plans are published and made available for public review. (When significant written and oral comments are received on the draft metropolitan transportation plan and TIP (including the financial plans) as a result of the participation process or the interagency consultation process, a summary, analysis, and report on the disposition of the comments shall be made as part of the final metropolitan plan and TIP.) The documentation of the Transportation Plan is contained in two separate reports, a technical report and a brochure. The brochure provides a listing of transportation policies and improvement projects included in the Transportation Plan. Maps displaying project locations are also in the brochure. The brochures are available to the public and all interested parties. The brochures have been widely distributed.

Open board and committee meetings, newsletters, brochures, agency sponsored public transportation meetings and presentation to civic and neighborhood groups have established a well-rounded public participation program. The future public participation process sponsored by NIRCC will not significantly change from the historical program. This policy merely documents the process and formally commits the council to continue these activities previously implemented as part of the transportation planning process.

Section II

Board and Committee Meetings

The major boards and committees involved in the transportation planning process include the Northeastern Indiana Regional Coordinating Council (NIRCC), Urban Transportation Advisory Board (UTAB), Transportation Technical Committee (TTC), and Transit Planning Committee (TPC). Elected officials, appointed public officials, consumers and transit labor representatives serve in different capacities on these boards and committees. The composition of these groups is provided in Appendix A. The official tasks charged to these groups are discussed in Section I.

The boards and committees hold regularly scheduled meetings. These generally occur on a monthly basis. Notices of the meeting time, date and place are provided to all interested parties including the news media and representatives of low-income and minority populations. The meeting schedule is posted on the NIRCC web site. All meetings are open to the public; minutes of these meetings as well as any presented reports are available for review through our offices. Requests for inclusion on the board and committee notification list can be made through the NIRCC office.

Board and Committee meetings conducted in this manner meet several primary objectives of a pro-active public involvement program with the transportation planning process. First, the membership of the Boards and Committees provides for direct participation in transportation planning by elected and appointed public officials. Secondly, open meetings provide all public officials and interested citizens the opportunity to observe and scrutinize the decision-making process. And thirdly, public involvement with these meetings and their respective contents (through minutes and

reports) provides access to technical and policy information used in the development of plans and Transportation Improvement Programs.

The Northeastern Indiana Regional Coordinating Council has a Bicycle and Pedestrian Forum that provides for discussion and development of regional bicycle and pedestrian plans. This process supports the bicycle and pedestrian component of the Transportation Plan. The membership of the Forum includes representatives of bicycle and pedestrian, park, planning, trail, and highway and transit groups.

Section III

Unified Planning Work Program

The Unified Planning Work Program (UPWP) is prepared annually to provide a guide to the work which must be accomplished to achieve a Comprehensive Transportation Plan for the region. The UPWP may also provide insight to other planning activities of the Council. This program outlines all work to be performed by the Council and includes the regional, state and federally funded programs engaged in by the Council.

The UPWP provides the Council with an administrative and management tool, and allows the Council to monitor its total work effort and assure itself that all necessary elements of the transportation planning process are being addressed. The program is not only designed to openly achieve the goals and objectives of the Council, but also to coordinate with the goals and objectives of federal, state, and local agencies, and to make maximum use of available resources.

All phases of planning from problem identification to actual program implementation require citizen input to ensure that the planning process accurately addresses the transportation needs of the area. Citizen involvement is sought from throughout the metropolitan planning area, and includes the diverse social and economic classes within it. In order to have more diversified and complete citizen involvement; participation from elderly, disabled and minority groups is actively solicited.

Included in the UPWP are specific work elements concerned with maintaining a high level of citizen involvement in the transportation planning process. These elements require a considerable measure of cooperation, coordination, and work by the Council and the staff, elected officials of local, state, and federal governments, as well as the citizens of the community.

The UPWP identifies its major areas of responsibility where staff will perform specific duties aimed at promoting and encouraging citizen involvement. These areas under the citizen participation category include meetings, transportation planning briefs and annual report, information assistance, visualization activities, web site maintenance and news media. These activities, as described below, will continue to serve as one component of the public involvement process.

Meetings

The staff meets with various civic and service related citizen groups as well as the public at-large to gain a further knowledge of specific transportation problems. By utilizing existing citizen and neighborhood organizations, high levels of continued public participation can be sustained among the community residents, local officials, governmental agencies, and the Council. Interaction with citizens is vital in keeping government responsive to the needs and desires of the community. It further enhances the ability of citizens to make suggestions regarding projects, and to aid in the initiation of projects.

Citizen participation meetings are held with neighborhood groups, community based organizations and civic groups as requested. Transportation information presented and discussed at these meetings may be either specific or general in nature, depending on the audiences' preference. Staff will continue to make themselves available to speak at these functions.

The NIRCC staff will also attend meetings of neighborhood representatives sponsored by the Cities of Fort Wayne and New Haven, and Allen County. The City of Fort Wayne sponsors Area Partnerships meetings. The City of New Haven sponsors meetings of their neighborhood association presidents and Allen County sponsors the Allen County Home Owners Association meetings. NIRCC will request the opportunity to present

transportation planning information and to solicit input to the transportation plans and projects at these meetings.

In addition, the Council conducts general public participation meetings throughout the year. The number of meetings conducted each year may vary depending on specific projects and issues under consideration. Notice of these meetings will be provided to neighborhood representatives and all other interested parties are invited to attend. One meeting will always be held each spring to coincide with the development of the Transportation Improvement Program. Public meetings will also be conducted prior to determining conformity on Transportation Improvement Programs and Transportation Plans. Special public participation meetings will be held during the development of long range transportation plans. These meetings will be discussed more thoroughly in Section IV and VI respectively.

Staff routinely attends meetings and public hearings to listen to public comment and provide information on planning support for highway and transit projects. Informative meetings and public hearings are often held at various stages of project implementation. Staff support and attend these meetings as part of the project team, which will also include representatives of the implementing agency, state officials, and consultants. The planning information presented at these meetings is an important component of the public participation process. Likewise, feedback through public comment is valuable information for the staff and planning committees. Staff will continue to support and attend informative meetings and public hearings.

Transportation Planning Briefs and Annual Report

In an attempt to reach the greatest number of people and groups, transportation planning briefs provide an economical alternative to meetings. The briefs are sent to interested individuals and groups as well as to the local news media, governmental agencies, and elected officials. The annual report highlights the planning activities and provides information on the various studies conducted to support the transportation planning process. The planning briefs and annual report are posted on the NIRCC web site.

The staff generally prepares informational briefs twice a year. The briefs are distributed to Council members, local elected officials, state and federal legislators, local news

media, governmental agencies, civic groups and interested citizens. In addition, the Council publishes an annual report summarizing the progress that has been made in transportation planning and project implementation. Copies of the annual report are distributed to board members, state and federal agencies and made available to the general public.

Information Assistance

The staff will continue to respond to requests for information pertaining to Council activities and programs from interested citizens and groups. Assistance will be provided to interested individuals and groups upon request. From previous experience, requests include information concerning transportation improvement projects, Fort Wayne and Allen County air quality problems and transportation planning activities conducted by the Council. Local residents and businesses request traffic data and transportation planning information through correspondence, visits to the office, and telephone conversations. The staff responds to these requests with the most accurate and timely information available.

Visualization Activities

The Council prepares visual aid presentations for civic and community groups as an educational tool to heighten public interest in the Council's transportation planning activities. Visualization techniques are developed and/or revised in-house as needed, or located from other sources to be shown to interested local groups, civic organizations, and schools regarding different facets of the Council's work activities. These materials aid in the understanding and awareness of the Council's transportation activities.

Web Site-Access to World Wide Web

The NIRCC web site provides information on the transportation planning process and activities. The Transportation Plan, Transportation Improvement Program and other planning documents are posted on the site and available for viewing. NIRCC will continue to provide current information on the transportation planning activities. Staff will evaluate available data and information for inclusion on the web site. Options will continue to be explored to provide maps and GIS related information for public consumption. Staff will develop, post and maintain transportation planning information

on the web site. The information available on the site will improve public access to the transportation planning process and documents.

News Media Involvement

The news media is continually informed of Council activities through the distribution of background information or press releases, and through media interviews on television, radio, and in newspapers. Background information and press releases are prepared and distributed to the media regarding planning work activities. In addition, the staff will remain open to the news media through interviews and other forms of active participation. This process will continue as a means to inform the public through the assistance of the news media.

Summary of UPWP

The goal of the UPWP activities is to promote citizen participation, to ensure that the needs and desires of the community and affected agencies are recognized and utilized as input into the planning process. The objective is to increase citizen interaction and participation within the region. Interaction among the community-at-large, local officials, governmental agencies, representatives of low-income and minority populations, and NIRCC happens through meetings with civic and neighborhood groups, visual presentations, information on the World Wide Web, transportation planning briefs, annual reports, information supplied to the news media, and through information provided to interested citizens or groups.

Through these efforts, the staff provides technical and other supportive assistance necessary for community meetings. The purpose of this process is: to inform citizens, elected officials and interested parties about the planning activities of the Council and staff; to distribute and collect information; and to obtain public input regarding the Council's transportation related programs. These meetings are held at various locations throughout the area with local organizations and minority groups. Staff also prepares transportation planning briefs and provides information assistance to citizens; organizations and minority groups; informs the media of work activities; and prepares visual presentations in a continuing effort to provide accurate information to the entire area. The result of the citizen participation effort is to increase citizen involvement in,

and interaction with public officials and others who affect local and area wide decision-making in the transportation planning process.

Section IV

Citizen Meetings

Meetings with area residents follow two different formats. General public participation meetings are held each year. These meetings cover all issues, including local and state activities involved with the transportation planning process. The format for these meetings is discussed further in this section.

Public participation meetings are held at various times throughout the year as needed. One meeting is held in the spring to obtain public input and comment on the development of the Transportation Improvement Program and corresponding Air Quality Conformity Determination. These meetings allow staff and citizens to share ideas and exchange information concerning transportation issues. Topics covered at these meetings may include long range transportation plans, management system programs, Transportation Improvement Program (TIP), transit services, transportation funding and financial resource management, MPO activities and studies, air quality issues, specific improvement projects and other related topics. Citizen concerns are documented and presented to the applicable agencies, committees and the Urban Transportation Advisory Board. When significant written and oral comments are received on the draft metropolitan Transportation Plan and TIP (including the financial plans) as a result of the participation process or the interagency consultation process, a summary, analysis, and report on the disposition of the comments shall be made as part of the final Transportation Plan and TIP.

A direct mailing to all neighborhood associations in the MPA, representatives of civic organizations, and other interested persons is used to notify residents of the scheduled meetings. Neighborhood and civic organizations representing minority and low income populations are included in these mailings. Other interested parties including affected public agencies, representatives of public transportation employees, freight shippers and

providers of freight transportation services, private transportation providers, representatives of public transportation, bicycle and pedestrian groups, and representatives of disabled persons are also notified of the public meetings. Press releases will also be distributed to the media. Media coverage of these meetings has traditionally provided additional notification of meeting times and locations. Citizens unable to attend the meetings are encouraged to telephone, mail, e-mail, or fax their comments and concerns to our office.

A meeting is held each spring with a special focus on the Transportation Improvement Program. General transportation issues may also be addressed at this meeting. All interested parties and affected agencies are welcome to attend. Notices will be sent to interested parties. Further discussion of these meetings is provided in Section V.

At other times throughout the year, meetings are held to discuss specific projects or transportation planning issues and provide information to the public. At all public meetings, participants have the opportunity to ask questions, exchange ideas, and share information with staff members. If a response to a question or concern cannot be provided at the meeting, staff will research the issue and through TTC or TPC assistance, a response will be provided. All comments will be documented as a part of the citizen involvement process.

NIRCC sponsors additional public participation meetings during the development of the Transportation Plan. These meetings focus on selected areas of plan development. The Transportation Plan meetings are scheduled at strategic times coinciding with the appropriate phase as the transportation plan develops. These meetings cover local and state issues important to the Metropolitan Planning Area. All interested parties and affected agencies are welcome to attend. Notices are sent to interested parties. Further discussion of these meetings is provided in Section VI.

In the past, the citizen participation meetings have worked extremely well as a forum for exchanging ideas and information. Citizens are also encouraged to attend meetings of the Northeastern Indiana Regional Coordinating Council, Urban Transportation Advisory Board, and related subcommittees. As previously mentioned, these meetings are held

regularly at pre-designated times and places and are announced through the local media and posted in our office. The public participation process provides citizens access to the planning process, affording them the opportunity to participate in transportation planning and decision-making activities.

Section V

Transportation Improvement Program

The Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) have required a Transportation Improvement Program (TIP) since 1977 from urbanized areas that have a population exceeding 50,000 people. The preparation and submission of a TIP is necessary in order to obtain federal assistance for transportation projects within the metropolitan planning area. The regulations define the TIP as a staged multi-year program of federally assisted transportation projects. The functional groups assisting the Northeast Indiana Regional coordinating council (NIRCC) in this regard have determined a four-year program, updated annually best serves the transportation needs of the Fort Wayne-New Haven-Allen County Metropolitan Planning Area.

The TIP has historically included projects selected from the Management Systems and the Transportation Plan. The TIP has also included projects from the Indiana Department of Transportation and from the Fort Wayne Public Transportation Corporation (CITILINK). The TIP has been updated annually by the Urban Transportation Advisory Board and approved by NIRCC as the Metropolitan Planning Organization (MPO). The implementing agencies with jurisdiction in the metropolitan planning area have participated on UTAB and NIRCC for many years. The TIP has served the local officials of the Fort Wayne urbanized area as a transportation capital improvement program for federally assisted projects.

The primary concern for this process is to ensure that interested parties can participate in the process with a reasonable opportunity to comment before the TIP is adopted. The process is initiated through a high level of direct public involvement in the Management Systems and the Transportation Plan (the two areas where projects are selected for

inclusion in the TIP). Therefore, projects and policies selected for inclusion in the TIP should be familiar to local residents and interested parties. In addition, specific steps to inform the public and interested parties of the development and content of the TIP are described below.

The public involvement process with the TIP includes several mechanisms to fulfill this objective. These include: open board and committee meetings; citizen and agency meetings; newsletters and annual reports; release of information to the news media; posting of the TIP on the NIRCC web site; and publication of the adopted TIP document.

The Northeastern Indiana Regional Coordinating Council and the Urban Transportation Advisory Board hold regularly scheduled monthly meetings. The preparation of the TIP including project selection is primarily conducted at UTAB meetings. The UTAB meetings are scheduled for the entire calendar year and are generally on the first Tuesday of each month. The NIRCC meetings are scheduled “as needed” at least two weeks in advance. The meetings of both NIRCC and UTAB are all open to the public. Meeting notices, agendas, and minutes are sent to all interested parties including: citizens; affected public agencies; representatives of transportation agency employees; organizations representing minority and low income populations; and private providers of transportation services.

Citizen meetings are sponsored by the Council to gain public input to the transportation planning process. These meetings are informal, allowing citizens to ask questions, provide ideas, and discuss all aspects of local plans, programs, and funding for both transit and highway projects. In addition, presentations to organizations and neighborhood associations are used to supplement the citizen participation program through the exchange of information. These sessions include discussion of transit and highway improvements, and afford these groups the opportunity to comment on transportation plans and programs of the Council.

The general citizen involvement meeting held in the spring of each year will have a special emphasis on presenting and discussing the upcoming TIP. This meeting is held prior to TIP adoption to allow opportunity for public comment. Comments regarding the

TIP are presented to UTAB and NIRCC. Any significant oral or written comment and response is appropriately documented in the TIP. As part of the TIP process, an annual list of federally obligated transportation projects will be published and posted on the NIRCC web site.

The Council prepares and distributes to the public annual reports and newsletters. These publications contain information on a wide range of transportation planning issues. Special sections in these publications describe the Transportation Improvement Program, display maps of project locations, and list highway and transit projects.

The meeting schedules and agendas are routinely sent to the news media one week to ten days prior to each meeting. Discussion of agenda items are often conducted with the media to help them understand specifically what UTAB intends to review and approve. Special requests are made to the news media to print highway and transit projects as proposed for inclusion in the TIP. This process has been well received and the news media has provided a valuable service to the transportation planning process through its coverage of transportation planning issues. In addition, the results of board action are also covered by the news media.

NIRCC consults with agencies and officials responsible for other planning within the Metropolitan Planning Area as part of the transportation planning program. The TIP is developed with consideration of other planning activities within, and outside the Metropolitan Planning Area. This consideration includes review and comparisons with planning documents developed by other agencies. The Public Transportation operator is directly involved in the development of the TIP. NIRCC will notify affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, pedestrian walkways, bicycle transportation facilities, representatives of the disabled, and other interested parties with reasonable opportunities to be involved in the metropolitan planning process when development of the TIP is initiated.

Finally, upon completion and adoption, the TIP is published as a document and made available for review in the NIRCC office. The TIP contains highway, transit, bicycle and pedestrian projects for both local and state governments within the Metropolitan Planning

Area. The TIP includes responses to comments and concerns received through the participation process. Copies of the TIP are available to UTAB members, implementing agencies, and other public officials via the NIRCC web site.

Section VI

Long-Range Transportation Plan

The Northeastern Indiana Regional Coordinating Council is responsible for developing a Transportation Plan that meets existing and future travel needs of the Fort Wayne-New Haven-Allen County Metropolitan Planning Area. The development of the plan involves a variety of governmental agencies plus considerable public participation. The factors and events that lead to the selection of a plan include public participation as a critical component in the decision-making process. Public officials and local citizens have historically provided valuable and the comprehensive input throughout the development of the transportation plans and updates.

Presentations are made to the Urban Transportation Advisory Board and related committees to inform, stimulate participation, and obtain policy guidance at all stages of plan development. These meetings are open to the public and information presented at these meetings is also available to any interested party. Citizen and agency participation meetings are also conducted to inform area residents of the planning process and status of the plan development.

For over twenty years the Council has actively encouraged participation in the development of the Transportation Plan. When preparing a plan, the Council routinely holds public meetings at several stages of plan development. The purpose of these meetings is to encourage interested parties to participate and provide input throughout the plan development. Since the first Transportation Plan that was developed in the early 1980's, all Plans have encouraged citizen and public official participation.

Citizen and agency meetings provide the opportunity for discussing and exchanging ideas concerning the future transportation system. Questions and comments are abundant at these meetings. Valuable information is shared and the quality of the plans has been significantly enhanced through the community involvement activities. The citizen input

meetings are generally held at various locations throughout the Metropolitan Planning Area during different phases of plan development.

Numerous other efforts are made to inform and involve the public in developing the transportation plans and updates. When requested, staff makes numerous special presentations to neighborhood and civic groups. Citizens are also encouraged to visit our offices, mail in comments, or contact us by telephone to discuss plan development and provide suggestions. In addition, the development of the Transportation Plan has traditionally received extensive coverage by the local news media.

The finalization of a transportation plan or update has always resulted in the publication of various reports and brochures. The reports document the technical aspects of the plan including the planning process and resulting adopted policies and projects. The brochure highlights the transportation plan's policies and projects, including maps that identify project locations. These documents are always made available to all interested parties and are widely distributed.

As part of the public involvement process, NIRCC will continue to follow this format. The board and committee meetings where discussions of transportation policies take place are open to the public and all materials presented are available for public review. This provides public access to the sessions where key decisions occur and the information provided to support such decisions. In addition, through the composition of the boards and committees, public officials and interested public and private agency involvement is inherently built into the structure. Interested parties can request consultation sessions at any time throughout the plan development.

Citizen and public official involvement meetings are conducted at strategic points throughout the development of transportation plans. The meetings are held at various accessible locations (i.e. schools, libraries, public buildings, etc.) throughout the Metropolitan Planning Area. Notification of the meeting dates and times are provided through mailings to neighborhood association representatives, public officials, and press

releases to the news media. Neighborhood and civic organizations representing minority and low income populations also receive invitations to these meetings. Staff also makes special presentations to any community, neighborhood, or civic group as requested.

NIRCC consults with agencies and officials responsible for other planning activities within the Metropolitan Planning Area, as appropriate in the development of Transportation Plans. The consultation process includes agency meetings and comparisons with planning documents developed by such agencies including plans, maps and inventories. The public transportation operator is directly involved in the development of the Transportation Plan.

The development of the Transportation Plan must include a discussion of types of potential environmental mitigation activities for the policy and/or strategic levels that are developed in consultation with state and local agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation concerning the development of the transportation plan. The consultation shall involve, as appropriate, comparison of transportation plans with State conservation plans or maps, if available, or comparison of transportation plans to inventories of natural or historic resources, if available. NIRCC will consult with Federal and State land management, wildlife and regulatory agencies for the purpose of defining potential environmental mitigation strategies. A list of appropriate contacts is provided in Appendix B of this plan.

As a Transportation Plan develops, information is available through the NIRCC office to all interested parties and special efforts are taken to inform the news media. Upon completion, the transportation plan including the planning process is documented in two separate report formats. A technical report is available to board members and selected parties detailing the development process and technical aspects of the plan. In addition, a brochure is prepared highlighting the Transportation Plan, its projects and policies. This brochure is widely distributed to all interested parties. All reports and materials resulting from the Transportation Plan development process are made available to the public and are posted on the NIRCC web site.

Section VII

Summary

The content of this document represents the participation process implemented by Northeastern Indiana Regional Coordinating Council for the metropolitan transportation planning process. This process addresses the entire scope of the metropolitan planning process including the development of the Transportation Plan and the Transportation Improvement Program (TIP). This process is developed in good faith and designed to meet or exceed all Federal rules and regulations. This process is in no way exclusionary, the intent is to maintain an atmosphere of public and agency participation through an open and inclusive process, where all interested parties are encouraged and allowed to participate. The Northeastern Indiana Regional Coordinating Council is committed to administering a transportation planning process where public involvement is encouraged at all levels. The well-established citizen participation process sponsored by the Council for over twenty-five years will continue as a vital component of transportation planning. NIRCC will continue to investigate and implement new strategies which encourage public involvement to ensure our transportation planning activities are community oriented.

The periodic review and evaluation of the public involvement process will determine whether the intended objectives of the public involvement process are being fulfilled. Necessary modifications will be implemented. Significant revisions to the public involvement process will not be adopted until a public comment period has been completed.

Appendix A

Northeastern Indiana Regional Coordinating Council Membership

Allen County Representatives Mayor,

City of Fort Wayne

Allen County Commissioner ¹

Allen County Commissioner ¹

Allen County Commissioner ¹

Allen County Council Member

DeKalb County Representative

Mayor, City of Auburn

DeKalb County Commissioner

DeKalb County Council Member

Wells County Representatives

Mayor, City of Bluffton

Wells County Commissioner

Wells County Council Member

Additional Representatives

Appointment by Governor of Indiana

¹Allen County Commissioners have three appointed representatives

Urban Transportation Advisory Board Membership

Allen County Fort Wayne Airport Authority Representative

Allen County Commissioner

Allen County Council Member

Allen County Highway Director

Allen County Plan Commission Member

Federal Highway Administration Representatives¹

Fort Wayne Board of Public Works Director

Fort Wayne City Engineer

Fort Wayne Planning/Economic Development Director

Fort Wayne Plan Commission Member

Fort Wayne Public Transportation Corporation General Manager

Indiana Department of Transportation – Fort Wayne District Manager

Indiana Department of Transportation Urban and MPO Section Representative¹

New Haven Mayor

¹ non-voting member

Transportation Technical Committee Membership

Allen County Highway Representative – Traffic Engineering

Allen County Highway – Right of Way Engineering

Allen County Planning Representative

Federal Highway Administration¹

Fort Wayne Community Development and Planning Representative

Fort Wayne Street Engineering Representative

Fort Wayne Traffic Engineering Representative

Indiana Department of Transportation – Traffic Engineering District Office

Indiana Department of Transportation Urban and MPO Section Representative¹

New Haven City Engineer

¹non-voting member

Transit Planning Committee Membership

Allen County Plan Commission Staff Representative

Community Transportation Network Representative

Consumer-Citilink Access

Consumer-Human Service Paratransit

Fort Wayne Community Development and Planning Staff Representative

Fort Wayne Public Transportation Corporation (Citilink)

Human Service Paratransit Provider Representatives (2)

Local 682 – Amalgamated Transit Union Representative

New Haven Plan Commission Representative

Private Paratransit Provider Representative

Private Taxi Provider Representative

Indiana Department of Transportation Transit Section Representative¹

¹non-voting member

Appendix B

Agencies contacted as part of the Participation Plan review.

Aeronautics Section
Intermodal Transportation Division
Indiana Department of Transportation
100 North Senate Avenue N901
Indianapolis, IN 46204

Division of Historic Preservation and Archaeology
Room W274, IGC South
402 West Washington Street
Indianapolis, IN 46204

Fort Wayne-Allen County Airport Authority
Suite 209, Lt. Paul Baer Terminal
3801 West Ferguson Road
Fort Wayne, IN 46809-3194

Ms. Kim Bowman
Allen County Department of Planning Services
Suite 150 Citizen Square
200 East Berry Street
Fort Wayne, IN 46802

Mr. John Urbahns
Greater Fort Wayne
200 East Main Street, Suite 800
Fort Wayne, IN 46802

Mr. Brian Yoh
New Haven Planning/Economic Development
815 Lincoln Highway E
New Haven, IN 46774-0570

Fort Wayne Re-Development
City-County Building Room 840
One East Main Street
Fort Wayne, IN 46802

Allen County Economic Development
Department of Planning Services
City-County Building Room 630
One East Main Street
Fort Wayne, IN 46802

Fort Wayne Economic Development
City-County Building Room 840
One East Main Street
Fort Wayne, IN 46802

Fort Wayne-Allen County Economic Development Alliance
110 West Berry Street, Suite 102
Fort Wayne IN 46802

Fort Wayne Historic Preservation
City-County Building Room 840
One East Main Street
Fort Wayne, IN 46802

ARCH
Historic Preservation
437 East Berry Street, Suite 204
Fort Wayne, IN 46802

Allen County Soil and Water Conservation District
3718 New Vision Drive
Fort Wayne, IN 46845

Purdue University Cooperative Extension Service
Allen County Office
4001 Crescent Avenue
Fort Wayne, IN 46815-4590

Maumee River Basin Commission
3864 New Vision Drive
Fort Wayne, IN 46845

Kitty Hawk Cargo
P.O. Box 9623
Fort Wayne, IN 46899-9623

Triple Crown Services
2720 Dupont Commerce Court
Fort Wayne, IN 46825

ABF Freight System
3320 N Wells Street
Fort Wayne, IN 46808

FedEx Freight Inc
3907 Transportation Drive
Fort Wayne, IN 46818

INDOT Fort Wayne District
5333 Hatfield Road
Fort Wayne, IN 46808

Deluxe Taxi
PO Box 10266
Fort Wayne, IN 46851

CTN
PO Box 13371
Fort Wayne, IN 46868

Local 682 ATU
12331 Kress Road
Roanoke, IN 46783

Kidz Cab
8616 Rail Fence Road
Fort Wayne, IN 46835

ACCA
233 W Main Street
Fort Wayne, IN 46802

Turnstone
3320 N Clinton Street
Fort Wayne, IN 46805

Fort Wayne Urban League
2135 S Hanna Street
Fort Wayne, IN 46803

Greenway Consortium
8634 Castle Creek Drive
Fort Wayne, IN 46804

Northwest Allen Trails
312 E Dupont Road
Fort Wayne, IN 46825

Aboite New Trails
5750 Coventry Lane
Fort Wayne, IN 46804

New Haven/Adams Twp Parks and Recreation
1125 Hartzell Street
New Haven, IN 46774

Agencies contacted for Participation Plan review and to be contacted as part of
Transportation Plan environmental mitigation consultation and participation process.

State Conservationist
Natural Resources Conservation Services
6013 Lakeside Boulevard
Indianapolis, IN 46278

Head Environmental Geology
Section Indiana Geological
Survey
611 North Walnut Grove
Bloomington, IN 47405

Regional Environmental Coordinator
National Park Service
Midwest Regional Office
601 Riverfront Drive
Omaha, NE 68102

Federal Highway Administration
Room 254 – Federal Office Building
575 North Pennsylvania Street
Indianapolis, IN 46204

Indiana Department of Natural Resources
Environmental Unit
Environmental Coordinator 402 West
Washington Street, W264 Indianapolis, IN
46204-2641

Commissioner
Indiana Department of Environmental Management
100 North Senate Avenue N1301, MC 50-01
Indianapolis, IN 46204

U.S. Fish and Wildlife Service
P.O. Box 2616
Chesterton, IN 46304
Elizabeth_mccloskey@fws.gov

Environmental Officer
U.S. Department of Housing and Urban Development
Community Planning and Development, 5 ADE
77 West Jackson Boulevard
Chicago, IL 60604

Chief Environmental Analysis
Branch Department of the Army
Detroit District, Corps of Engineers
ATTN: CENCE-PD-EA (Weigum)
P.O. Box 1027
Detroit, MI 48231-1027

U.S. Environmental Protection Agency
AR-18J
77 West Jackson Boulevard
Chicago, IL 60604-3507

IDNR-Division of Fish and Wildlife
1124 N Mexico Road
Peru, IN 46970

IDNR-Division of Nature Preserves
402 W Washington Street W267
Indianapolis, IN 46204

U.S. EPA-Region V-Superfund
77 W Jackson Boulevard
Chicago, IL 60604

FTA Region V
200 W Adams Street Suite 320
Chicago, IL 60606

Division of Historic Preservation and Archaeology
Room W274, IGC South
402 West Washington Street
Indianapolis, IN 46204

Executive Director
ARCH
Historic Preservation
437 East Berry Street, Suite 204
Fort Wayne, IN 46802

Administrator
Fort Wayne Historic Preservation Review Board
City-County Building Room 840
One East Main Street
Fort Wayne, IN 46802

Chief NEPA Implementation
Section
Office of Science, Ecosystems, and Communities
U.S. Environmental Protection Agency
B-19J
77 West Jackson Boulevard
Chicago, IL 60604-3590

Exhibit E

Fort Wayne Public Transportation Corporation/Citilink Language Assistance Plan (LAP) Revised June 19, 2019

Four Factor Analysis

1. The number or proportion of Limited English Proficiency (LEP) persons eligible to be served or likely to be encountered.

a. How LEP persons interact with the transit system.

Fixed route & paratransit passengers accessing Citilink services interact with drivers, customer service representatives, operations supervisors & management personnel through personal contact, phone, website, e-mail, facebook, written system information, etc. in our buses, transit station, bus stops, offices, public meetings, etc.

b. Assessment of the number or proportion of LEP persons from each language group.

Pop that speak English “less than very well”	2010 Census	2014 ASC
Total	12,551 (5.4% of total pop)	12,858 (5.4% of total pop)
Spanish	7,592	6,491
Indo-European languages	2,246	1,835
Asian & Pacific languages	2,422	4,038
Other	291	494

The 2010 census data has identified 25,358 residents of the City of Fort Wayne, who spoke a language other than English in their home (10.9% of the population over the age of 5). Of these, residents 12,551 spoke English “less than very well” (5.4% of the population over the age of 5). Further, a greater proportion of the individuals unable to speak English well are adults over age 18.

The 2014 American Community Survey data represents the growth in residents whose primary language is of Asian origin. Many are Burmese refugees; however, there is not a common language/dialect. No one language exceeded the Safe Harbor threshold of 5% of the total population, however; two categories identified more than 1,000 people who spoke a foreign language and English “less than very well” these were Spanish/Creole and “other Asian languages” which likely includes several languages/dialects spoken by refugees from Burma/Myanmar.

Language diversity continues to increase and Fort Wayne tends to have more than the state average (9.6% Fort Wayne vs. 7.9% Indiana average 2007-2011). The Fort Wayne Community School system reports that their students speak over 79 different languages at home. More than 1,330 students participate in English Language Learner programs in 20

of their schools. Much of our community's multicultural growth is due to aggressive refugee resettlement efforts by the Lutheran and Catholic Church organizations in our area. It is said that Fort Wayne has the largest number of Burmese outside of Burma. That said, the number of LEP persons in Fort Wayne remains a small percentage of the overall speaking population (5.4%).

Community service providers have provided information on residential clusters and primary destinations for recent immigrants & refugees as we work together to provide access to essential services. Our drivers have also become familiar with common travel patterns of passengers who have LEP issues.

c. Literacy skills of LEP persons in their native language.

While this is often difficult to assess, we are aware that sometimes recent refugees are not able to read their own language or speak a different dialect than the available interpreters. This barrier greatly affects our ability to communicate and the learning curve as they assimilate to our language & culture. We work closely with the community service organizations to provide individualized transit travel training by a peer who speaks their language. This 'buddy system' works well for anyone trying to learn how to use public transit. It has been our experience that we encounter about 5-10 people per year who have this additional limitation.

d. Level of underutilization of transit system by LEP persons due to language barrier.

Regular contact with community organizations help to minimize barriers. Our "How to Ride the Bus" video available in English, Spanish & Burmese offers a visual & oral explanation that is helpful for those who have literacy issues. Often public transit orientation is provided by service agencies as part of the assimilation process. Passengers who require assistance are referred to appropriate agencies for training & support. Citilink staff is trained to provide assistance and how to get more help when needed. While it's difficult to assess who is not being served, we are relatively confident that anyone in contact with a local service agency will be provided the assistance needed to utilize our service. Link to translated resources:

<https://www.fwcitilink.com/title-VI.php>

2. The frequency with which LEP persons come into contact with Citilink Services.

a. Use of fixed route & paratransit service.

Often recent immigrants are regular users of fixed route services as they are unable to obtain a driver's license and do not have access to a car. Very few LEP persons use our paratransit service and there are few issues as it is relatively easy to get translation assistance with the application process & have someone call in reservations.

b. Purchase of passes through vending machines, outlets, websites & over the phone.

Our first and only pass sales machine in our new Central Station. It has information in Spanish & Braille and is pretty simple to use and Customer Service staff are nearby to assist as needed. Passes are available at local grocery store customer service, city utilities, Urban League & many social service agencies distribute them to their clientele. We also recently updated our on-line pass sales service available through our website <https://store.fwcitilink.com/>. Many purchase day passes from the farebox on the bus. Drivers have a fare information card handout translated into Spanish & Burmese (see attached). Drivers occasionally notify us of communication difficulties and we try to connect the passenger with the appropriate Citilink staff or one of several service agencies that provide training/translation.

c. Participation in public meetings.

When Citilink staff attends meetings targeted to address a particular LEP population, translation service is generally provided or another member of the audience steps in to help explain. We are not aware of this being an issue at a general meeting.

d. Customer service interaction.

Occasionally someone will call and need translation assistance. Often we can utilize a Citilink staff person to help translate or contact Language Services Network that provides free translation services. We have also used Google translator & visual aids to help with communication.

e. Ridership/operation surveys.

Occasionally surveys are translated into Spanish; however, we have found that when we have done on-board surveys the interviewer is able to collect the information from all passengers.

3. The nature and importance of public transit to people's lives.

Mobility is essential to be able to access jobs, education, community services, etc. Often LEP populations are transit dependent – at least until they learn enough English to get a driver license, car & job.

Community needs surveys and community meetings consistently rank access to affordable transportation as a top 5 need. United Way & Community Action surveys of low income families have ranked transportation as number 2 need (just after affordable housing). Council on Aging surveys of their clientele identify transportation to non-emergency medical services as a top 5 concern. Access to medical care/social services are essential to strong families. A survey of homeless individuals and shelter providers identify transportation to jobs during non-traditional hours (nights & weekends) as a significant barrier to entry level jobs.

Citilink surveys of our ridership indicate that over 30% are riding to/from work; 20% to education; 11% to medical/social services; 16% shopping; and 23% social/other.

Combined housing & transportation costs are excessive for 2/3 of Allen County households. Spending more than 45% of income on housing & transportation represents a cost burden. Public transit can reduce that burden by saving a two-person household about \$10,000/year (APTA).

Even access to groceries/nutritious food is challenging for low-income and LEP communities. Often affordable housing is located within “food desert” communities and transportation issues provide a significant barrier when trying to access fresh fruits & vegetables or to fulfill culturally appropriate diet requirements.

4. Resources available for LEP outreach, as well as the cost associated.

Citilink attempts to provide the maximum level of service possible with the resources available. While Fort Wayne is the second largest city in Indiana the investment in public transit is relatively small for a city our size. Thus, the budget for marketing and staff to provide outreach is limited. Efforts are made to provide vital information using universal signs, symbols and pictures. LEP related expenses include; translating updates to system information, printing, website updates, language cards, semi-annual staff in-service meetings that include cultural sensitivity & communication refresher, and a small portion of time by the Asst. General Manager & Operations Manager to do community outreach. It would be difficult to do much more without jeopardizing the quality & quantity of transit service. Estimated annual cost of LEP related activity is \$1,000/year. In addition, our local Metropolitan Planning Organization expends time and resources to ensure inclusivity and diverse community involvement in the public transportation planning processes and documents they oversee.

Conclusion:

A relatively small portion of the population of Fort Wayne has indicated they speak English “less than very well”. The majority of non-English speaking residents identify Spanish as their primary language. Due to unique circumstances, a significant number of refugees from Burma have located in our community and service providers have joined together to ensure needs are met. Thus, Citilink’s emphasis on providing translated materials in Spanish & Burmese seems reasonable given the limited resources available for marketing & outreach. In addition, Citilink’s commitment to quality customer service includes community outreach, employee training & creative use of service agency travel training & translation assistance to ensure that Citilink passengers receive quality service. Translation in other languages can be provided by request; utilizing Language Services Network program translators.

Language Assistance Plan

This plan is created to define a reasonable process utilizing limited resources to provide meaningful access to Citilink benefits, services, information and other important activities.

1. Identifying LEP individuals who need language assistance/Results of the Four Factor Analysis

See above.

2. Available language assistance services (by language).

Training has been provided to customer service representatives, bus drivers, dispatchers & supervisory staff regarding availability of resources and how to respond to an LEP caller and/or request for translated information. Staff who are able to speak Spanish are consulted for time-sensitive assistance (sometimes other passengers can assist).

Professional translation is provided by Language Services Network free of charge by certified translators in multiple languages. During standard business hours staff are available by phone (we have used the Police Desk staff emergency translation contacts for after-hours assistance). Table 1 is a compilation of all available translated materials & services identifying language & distribution methods. Documents that are considered “vital” to access our transit services are marked with an asterisk “*”. All vital documents have been translated into both Spanish and Burmese. **See attached Table 1.**

3. Notice of language service availability.

All route schedules & system maps have info in Spanish regarding translation services. At each schedule rack there is a sign in Spanish regarding availability of schedules in Spanish, upon request. The Title VI policy is posted on each bus, in public waiting areas and on our website in English & Spanish. Translated materials are distributed to service agencies & targeted events. All translated materials are available on the Citilink website <https://www.fwcitilink.com/title-VI.php>. Media releases are shared with news outlets targeting non-English speaking audiences. Citilink staff provide travel training/presentations/info tables/event sponsorships/etc. to targeted to LEP audiences and participate in community meetings with organizations serving LEP clientele. **See attached Table 2.**

4. Employee training to provide timely & reasonable language assistance.

Citilink staff are made familiar with LEP policies & procedures. Copies of this LAP have been distributed to all staff & they have received communication & cultural sensitivity training during employee orientation and refresher training during semi-annual meetings. Additional training is provided to customer service & supervisory staff. Retraining is provided as necessary as a component of the progressive discipline process. One tool we have used is the following video that covers Title VI LEP guidance:

<https://www.youtube.com/watch?v=RPCIqDtRUkA>.

Other videos we have found useful are available from the lep.gov website <http://www.lep.gov/video/video.html>.

Our Customer Service & Street Supervisors are equipped with laminated “Your Right to an Interpreter” I speak language identification cards that translate the following phrase in 35 languages “You have the right to an interpreter at no cost to you. Please point to your language. An interpreter will be called. Please wait.” This is available from the lep.gov website.

5. Monitor, evaluation & update of language access plan.

Community outreach efforts are monitored & evaluated in conjunction with implementation of the annual marketing & communications plan. The Marketing Committee of the board of director’s meets regularly (at least quarterly) to review activity and plan future efforts. Citilink management staff receive feedback from front line staff regarding effectiveness of LEP assistance resources & procedures. Semi-annual all staff meetings are an opportunity to discuss LEP issues & resources. Participation in community meetings & presentations allow staff to liaison with service providers & customers. Citilink Rider Roundtables are scheduled quarterly to allow for information exchange; efforts are made to encourage minority participation in these meetings. Customer complaints are recorded in a database, addressed promptly & monitored for LEP communication issues. Periodic ridership surveys allow for feedback & evaluation of existing services. Occasionally interns are available to serve as Secret Shoppers and report on their bus riding experience (safety/customer service/driver professionalism/bus condition/etc.). Additional resources & processes will be implemented and the Language Assistance Plan will be updated annually and as needed based upon feedback received.

Safe Harbor Provision

Citilink will make available written translation of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons, whichever is less, of the total population of persons to be served or likely to be affected or encountered.

Language Assistance Plan (LAP) - Table 1
Available Language Assistance Services (by language) - Weblink to resources:
<https://www.fwcitilink.com/title-VI.php>

3/9/2016

Resource	Spanish	Burmese	Website	Distribution
*Fare Info Card (attached)	Yes	Yes	Yes	Available from driver/CSR
How to use the Farebox (info. sheet with photo)	No	Yes	Yes	Print available on request – distributed to service agencies/targeted events
Pass type detail info	No	Yes	Yes	Print available on request – distributed to service agencies/targeted events

*Service Commitments (system rules)	Yes	Yes	Yes	Print available on request – distributed to service agencies/targeted events
Trip Planning Worksheet	Yes	Yes	Yes	Print available on request – distributed to service agencies/targeted events
*How to Ride the bus video http://www.fwcitilink.com/how-to-ride-public-bus.php	Yes	Yes	Yes	also available on DVD on request – distributed to service agencies/runs on public access TV
Route Schedules	Yes	No	Yes	Print available on request – distributed to service agencies/targeted events
Translated info. availability notice	Yes	No	Yes	Posted at schedule racks (4), on system map, schedules
*System map – rider info on back of map	Yes	Yes	Yes	Print available on request – distributed to service agencies/targeted events
*Title VI notice/process	Yes	Yes	Yes	Posted in every bus/public areas
Title VI complaint form	No	No	Yes	This is available in English on our website
Ticket vending machine	Yes	No	N/A	Central Station/CSR assist avail upon request
List of staff available to translate	Yes	No	No	CSR, Dispatch & Supervisors
Language Services Network translation/interpretation service (FREE)	Yes	Yes	Yes	Posted in each bus/posted at schedule racks/CSR, Dispatch, Supervisors. Most other languages also
http://translation2.paralink.com/	Yes	Yes	No	Translator link on desktop at CSR/dispatch/supervisor – most other languages also
Ethnic News Media Releases	No	No	Yes	Media releases distributed to specialized news/media outlets/posted on website/facebook

Commercials/public service announcements http://www.youtube.com/user/FortWayneCitilink	Yes	No	Yes	A few of our commercials have been produced in Spanish, run periodically as PSA's & are available on our website via YouTube
Travel Training Power point	No	No	Yes	Picture based slides used in conjunction with interpreter for

				targeted training to LEP populations
Audible boarding announcements/station signage	No	No	N/A	Simple announcements made in English supplement single letter/number based info. on bus bay & route identification
Basic transit phrases/flash cards	Yes	Yes	No	CSR, Dispatch, supervisors, drivers – used for training/newsletter reminders
Basic Spanish for Transit Employees video/flip guide (CDOT)	Yes	No	No	CSR, Dispatch, supervisors, drivers – used for training
Communication/cultural sensitivity handouts	No	No	No	Used for employee training
Guide to Transportation Resources in Allen Co.	Yes	No	Yes	Created by MPO – print available on request – distributed to service agencies/targeted events
Access paratransit brochure	Yes	No	No	Schedule racks, CSR, distributed to service agencies/targeted events
Access paratransit application form	No	No	No	As a medical professional is required to complete the application form we have not needed to provide translation. The form is available in English on our website.
DBE Plan/vendor info	Yes	No	Yes	Vendor list provided via INDOT Admin.

Documents marked with “*” are considered vital to access services. All vital documents have been translated into Spanish & Burmese.

**Language Assistance Plan (LAP) - Table 2
LEP Community Outreach Partners**

3/9/16

Resource	Agency	Contact	Activity
Translation	Language Services Network Social Service agency translation services	Raquel Kline 426-6764 lsnfortwayne@yahoo.com www.lsnfortwane.com	Translate our materials, on call interpretation, interior bus signs, community outreach/evaluation
Networking	Multicultural Council	Christine Marshall mccfortwayne@yahoo.com	Take25 reader fair info table, quarterly meetings, court advocate training bus ride/info, outreach
Outreach	Fort Wayne Police	Ric Robles ricardo.robles@ci.ft-wayne.in.us	Info dist/Take25/networking
Job Training/ outreach	Friends of the Third World	Jim Goetsch 422-6821 fotw@igc.org	Bus pass sales/transit info outlet/computer recycling/job training/ networking
Media/outreach	http://internationalfortwayne.org/	Fred Gilbert fgilbert21@aol.com	Newsletter/blog/social media/translated info on their website
Translation/ outreach	Allen Co. Board of Health	Megan Reust 449-7395 megan.reust@allencounty.us	Produced ride the bus video/distribute system info/bus passes
Outreach	United Hispanic-Americans	Raquel Kline 456-5000	Info dist/outreach
ESL	Fort Wayne Community Schools	Krista Stockman Krista.stockman@fwcs.k12.in.us	Travel training/bus passes/translation
Outreach	Allen Co. Library	Lisa Worrell lworrell@acpl.lib.in.us	May - Rally to Read/system info. dist.
Translation	Allen Co. League for the Blind & Disabled/Deaflink	Dave Nelson 441-0551 The.league@frontier.com	Braille & TDD hearing

			translation/travel training/OEM
Burmese resettlement	Burmese Advocacy Center	Minn Myint Nan Tin mnantin@bacindiana.org 456-8969x316	Travel training/info dist/outreach
Media	El Mexicano	Editor Fernando Zapari 704-0682 456-6843? elmexica@earthlink.net	Info dist
Media	La Voz	Editor	Info dist - statewide
Media	La Mega 102.3	John Henry/Sandra Roe 482-4444 john@mega102fm.com	Info dist/marketing
Media	Frost Illustrated	745-0552	African/
Outreach	Hispanic Development/Amistad	Leo Pech leonelpesch@frontier.com 494-6620	April Dia del Nino Info table/ESL classes
Outreach	Literacy Alliance	Brian Schlichtenmyer Brian.Schlichtenmyer@fwliteracyalliance.org 426-7323	Info distribution
Outreach	Urban League	Denise Porter-Ross 745-3100 dporterross@fwurbanleague.org	Pass sales/info distribution/transit hub/literacy/
Outreach	Fiesta Fort Wayne		July info table
Outreach	International Festival		April info table
Outreach	Three Rivers Festival/International Village	Jack Hammer 426-5556 hammer@trfonline.org	July info table
Outreach	AISEDA African Immigrants Social & Economic Development Agency	705-2728	
Outreach	United Way/211/literacy	Tiffany Bailey tbailey@uwacin.org 469-4027	Info distribution/referral/ESL/outreach

Outreach	City of Fort Wayne/Community Liaison	Palermo Galindo Palermo.Galindo@cityof fortwayne.org 427-6214	Info distribution/translati on/diversity training
Outreach	Reclamation Project	494-5742 341-1993	
Interpreting	Your World Your Language	888-855-0811	Interpretation services
Outreach	Catholic Charities	422-5625	Interpretation/outreach/info dist.
Networking	Hispanic Chamber of Commerce	422-6697	Info. dist.
Outreach	Boys & Girls Club – resettled youth program	Maria Heredia mariafw@hotmail.com	Past Citilink board member/info dist/feedback

Language Assistance Plan	3/9/16	
Citilink Employees available to assist with translation		
Name	Title	Language
Junior Rodriguez	Maintenance Manager	Spanish
Rudy Guerrero	Bus Driver	Spanish
Jesus Martinez	Bus Driver	Spanish
Juan Perez	Hostler	Spanish
Carlos Perez-Jimenez	Mechanic	Spanish