

FY2024-2026

MACATAWA AREA EXPRESS TRANSPORTATION AUTHORITY

HOLLAND, MICHIGAN

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TITLE VI PROGRAM & PROCEDURES

Title VI Program & Procedures, Title VI Complaint Process Overview, Title VI Service Standards & Policies, Environmental Justice Guidance, Limited English Proficiency (LEP) Policy

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SECTION 1: TITLE VI PROGRAM, PUBLIC NOTICE, COMPLAINT DETERMINATION & RECORDS OF COMPLAINTS

The Macatawa Area Express Transportation Authority (MAX) serves as the federal recipient of Section 5307 funds for the Holland/Zeeland urbanized area. As a recipient of federal financial assistance and under Title VI of the Civil Rights Act of 1964 and related Title VI statutes, MAX assures that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits thereof, or otherwise be subjected to discrimination under any MAX programs or activities.

This Title VI Program is developed in accordance with FTA C 4702.1B. These prohibitions extend to all programs funded in whole or in part from federal financial assistance and are subject to Title VI requirements.

This policy is intended to establish a procedure under which complaints alleging discrimination in MAX provisions, services, or activities can be made by persons who are not MAX employees. MAX will not condone retaliation against an individual for their involvement in asserting their rights pursuant to Title VI or because they filed a complaint or participated in an investigation under Title VI.

TITLE VI PROGRAM OBJECTIVES

The procedures described and outlined within the following pages of the Title VI Program will enable the Macatawa Area Express to:

- Ensure that the level and quality of public transit service is provided in a nondiscriminatory manner;
- Promote full and fair participation in public transportation decision-making for all affected populations without regard to race, color, or national origin;
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency;
- Make good faith efforts to achieve Environmental Justice as part of its mission by identifying and addressing—as appropriate—disproportionally high and adverse human health or environmental effects of its programs, activities, and services on minority populations and low-income populations within MAX’s service area;
- Ensure that Limited English Proficient (LEP) individuals have access to MAX’s programs, activities, and services.

This policy is applicable to all MAX employees, members of the public, and all contractors hired by the Macatawa Area Express. Failure of MAX employees to follow this policy and procedure may subject such employees to disciplinary action up to and including employee termination.

REQUIREMENT TO PROVIDE ADDITIONAL INFORMATION

The Federal Transit Administration may request, at its discretion, information other than that required by Circular FTA C 4702.1B (October 1, 2012) in order for FTA to investigate complaints of discrimination or to resolve concerns about possible noncompliance with DOT’s Title VI regulations.

NOTE: Any person who believes MAX or any entity who receives federal financial assistance from or through MAX (i.e. sub-contractors or sub-grantees) has subjected them or any specific class of individuals to unlawful discrimination is encouraged to file a complaint of discrimination.

TITLE VI PUBLIC NOTICE

The Macatawa Area Express Transportation Authority has created a public notice that it complies with Title VI, including instructions to the public on how to file a discrimination complaint. The Title VI notice is posted in the following places and locations:

1. The MAX Authority’s public website;
2. Outside the main passenger transfer center (see APPENDIX A);

3. On all revenue vans and buses (see APPENDIX D);
4. Within the Master Bus Schedule booklet (both English- and Spanish-print versions);
5. Runs continuously on two (2) announcement monitors (see APPENDIX D) located inside the MAX main office and the transfer center passenger lobby (both English- and Spanish-versions).

Also, copies of the U.S. Department of Justice Civil Rights Division pamphlet “Your Rights Under Title VI of the Civil Rights Act of 1964” available at <https://www.justice.gov/sites/default/files/crt/legacy/2010/12/14/TitleVIEng.pdf> are stocked at our main office and transfer center lobby information displays.

The Title VI statement and policy is reviewed annually with Authority staff as part of the LEP training session.

TITLE VI COMPLAINT DETERMINATION & RECORDS OF COMPLAINTS

The Macatawa Area Express recognizes that Title VI complaints may not always be indicated to MAX as a specific or direct Title VI violation; therefore, all written complaints received by MAX—whether directly or indirectly—are reviewed by the designated Title VI Specialist with regard to violation of Title VI rights. All staff are trained to also recognize possible Title VI complaints, and to inform the Title VI Specialist immediately. Those complaints not requiring Title VI investigation are followed up within three (3) business days, with appropriate departmental managers involved as needed. Complaints warranting Title VI investigation, whether received through written record or subsequent interview, are the responsibility of the Title VI Specialist and will follow the sequence of steps detailed in the section *Title VI Complaint Process Overview* later outlined in this document.

The Title VI master data file includes such key information as:

- Basic information about the complaint such as when it was filed, who filed it, and who it was against, where the incident occurred, and identified witnesses;
- A description of the nature of the alleged discriminatory action;
- Notes/Status of the investigation;
- Findings of the investigation.

MAX will follow timelines set forth in guidance from the Department of Transportation for processing Title VI discrimination complaints. Forms are available to the public upon request and are shown in APPENDIX C.

WHEN TO FILE

A complaint of discrimination must be filed within 180 calendar days of the alleged act of discrimination, or discovery thereof—or where there has been a continuing course of conduct, the date on which the conduct was discontinued. Filing means a written complaint must be postmarked before the expiration of the 180-day period. The filing date is the day the complaint form is completed, signed, and mailed. The complaint form and consent/release form must be dated and signed for acceptance. Complaints received more than 180 days after the alleged discrimination will not be processed and will be returned to the complainant with a letter explaining why the complaint could not be processed and alternative agencies to which a report may be made.

WHERE TO FILE

In order to be processed, signed original complaint forms must be mailed or hand delivered to:

Macatawa Area Express Transportation Authority
Title VI Specialist
171 Lincoln Ave., Suite 20
Holland MI 49423

Upon request, reasonable accommodations will be made for persons who are unable to complete the complaint form due to disability or limited English proficiency. A complaint may also be filed by a representative on behalf

of a complainant. Persons not satisfied with the findings of MAX may seek remedy from other applicable state or federal agencies.

REQUIRED ELEMENTS OF A COMPLAINT

In order to be processed, a complaint must be in writing and contain the following:

- Name(s), and addresses(s) and business(es)/organization(s) of person(s) who allegedly discriminated;
- Date of alleged discrimination;
- Basis of complaint (i.e. race, color, or national origin);
- Signed consent release form.

INCOMPLETE COMPLAINTS

Upon initial review, the Title VI Specialist will ensure that the form is complete and that any initial supporting documentation is provided. Should deficiencies be found, the Title VI Specialist will notify the complainant within 10 working days. If reasonable efforts to reach the complainant are unsuccessful or the complainant does not respond within the time-period specified in the request (30 days), the recipient may close the complainant's file. The complainant may resubmit the complaint provided it is filed within the original 180-day period.

Should the complaint be closed due to lack of required information, MAX will notify the complainant at their last known address. In the event the complainant submits the missing information after the file has been closed, the complainant may be reopened provided it has not been more than 180 days since the date of the alleged discriminatory action.

SECTION 2: TITLE VI COMPLAINT PROCESS OVERVIEW

The following describes how a discrimination complaint is handled once received by MAX. This overview is also posted on the organizational website: www.catchamax.org under the *DBE/EEO/Title VI* section, along with the Title VI Complaint Form and a full copy of the Title VI Program & Procedures.

1. A complaint is received by MAX:

Complaints must be in writing and signed by the complainant or their designated representative. If the complainant is unable to complete the form in writing due to disability or limited-English proficiency, upon request reasonable accommodations will be made to ensure the complaint is received and processed in a timely manner. Complainants wishing to file a complaint that do not have access to the Internet nor ability to pick up a form, a form will be mailed to the complaint to complete. The complainant will be notified if the complaint form is incomplete and asked to furnish the missing information.

2. Complaint is logged into tracking database:

Completed complaint forms will be logged into the complaint tracking database; basic data will be maintained on each complaint received.

3. Review Complaint:

MAX's Title VI Specialist will complete an initial review of the complaint. The purpose of the review is to determine if the complaint meets the basic criteria. Criteria required for a complete complaint:

- Basis of alleged discrimination (i.e. race, color, or national origin);
- Determination of timeliness will also be made to ensure that the complaint was filed within the 180-day time requirement.

4. Initial written notice to complainant:

Within 10 working days of the receipt of the complaint, MAX will send notice to the complainant confirming receipt of the complaint; if needed the notice will request additional information, notify complainant that the activity is not related to a MAX program or activity, or does not meet deadline requirements. Conclusions made in step three will determine the appropriate response to the complaint. Examples of response letters are located in APPENDIX B of the Title VI Plan. If any additional information is needed from the complainant, it will be communicated at this point in the process.

5. Investigation of the complaint:

The Title VI Specialist will determine the most appropriate fact-finding process to ensure that all available information is collected in effort to reach the most informed conclusion and resolution of the complaint. The type of investigation techniques used may vary depending on the nature and circumstances of the alleged discrimination. An investigation may include but is not limited to:

- Internal meetings with MAX staff and legal counsel;
- Consultation with state and federal agencies;
- Interview(s) of complainant(s);
- Review of documentation (i.e. planning, public involvement, & technical program activities);
- Interview and review of documentation with other agencies involved;
- Review of technical analysis methods;
- Review of demographic data.

6. Determination of investigation:

An investigation must be completed within 60 days of receiving the complete complaint unless facts and circumstances warrant otherwise. A determination will be made based on information obtained. The Title VI Specialist and/or designee will render an action recommendation, including formal and/or informal resolution strategies in a Findings Report.

7. Notification of determination:

Within 10 days of completion of an investigation, the complainant must be notified by the Title VI Specialist of the final decision. The notification will advise the complainant of their appeal rights—including with state and federal agencies—if dissatisfied with the final decision. A copy of this letter, along with a report of the findings, will be forwarded to the Michigan Department of Transportation and Federal Transit Administration for informational purposes only.

SECTION 3: TITLE VI INVESTIGATION DETERMINATION & RESOLUTION STRATEGIES, PENDING CASES

Should an investigation conclude or indicate that the Macatawa Area Express Transportation Authority acted in violation of a complainant's Title VI rights—whether directly or indirectly—corrective actions will be taken by the Authority for individual employees and/or the Authority as a whole, including appropriate efforts to educate, train, monitor, re-evaluate policy, and/or, if warranted, administration of disciplinary measures.

Below are known local organizations within the Macatawa Area Express service area that have either worked with the Authority in the past or are known to offer training seminars and readily available information relating to rights protected under Title VI:

Disability Network Lakeshore
442 Century Lane
Holland MI 49423
www.dnlakeshore.org

Lakeshore Ethnic Diversity Alliance
515 South Waverly Road
Holland MI 49423
www.ethnicdiversity.org

TITLE VI COMPLAINT FORM

A sample of the Title VI complaint form is shown in APPENDIX C. Spanish-language versions of the Title VI form are posted on the MAX website and are available upon request from MAX Transit staff members.

TITLE VI INVESTIGATIONS, COMPLAINTS, LAWSUITS

The Macatawa Area Express Transportation Authority will maintain records of any, and all, Title VI-related investigations, complaints, or lawsuits that have occurred since the last update of this plan. A specific form (APPENDIX E) is used to record summary information, complaint basis, status of the case, and any other important notes pertaining to an incident.

SECTION 4: PUBLIC PARTICIPATION PLAN

PURPOSE OF THE PLAN

As an FTA grant recipient, the Macatawa Area Express complies with the public participation requirements of 49 U.S.C. Sections 5307(b)—requiring programs of projects to be developed with public participation—and 5307(c)(1)(I)—requiring a locally developed process to consider public comment before raising a fare or carrying out a major reduction in transportation service.

The fundamental objective of public engagement programs is to ensure that the concerns and issues of those with a stake in transportation decisions are identified and addressed in the development of policies, programs, and projects being proposed in their communities. As projects vary in time and size, the public participation process may vary for each, as well as the extent of public participation.

The following strategies are meant to ensure constructive, productive dialogue that will lead to practical decisions benefitting all members of the community, including low-income, traditionally underserved, and/or limited English proficient populations.

MAX's Public Participation Plan is based on the following principles:

- The engagement process will be flexible and accommodate participation in a variety of ways, and be adjusted as need;
- MAX will seek inclusiveness and proactively reach out to and engage low income, minority, and/or limited English proficient populations;
- All community feedback will be given careful and respectful consideration;
- Participation methods will allow for early involvement, and be ongoing;
- Participation methods will have a clear purpose and use for the input, and will be described in language that is easy to understand;
- Transparency—information provided will be accurate, trustworthy, and complete;
- MAX will respond and incorporate appropriate public comments into transit decisions;
- Meetings will be held in locations which are fully accessible and welcoming to all area residents, including low income and/or minority members of the community, and in locations relevant to the topics being presented and discussed.

OUTREACH AND INVOLVEMENT ACTIVITIES

Ongoing involvement strategies include:

- **Website/Social/Traditional Media:** MAX's website is used to share transit information, including proposed service changes. Information is also shared through social media outlets with community comment sought. Notices and/or handbills describing service proposals are also distributed directly on

buses for those without access to social media or internet. Press releases to area newspapers, television and radio stations are used to notify the community of upcoming MAX activities or to relay information.

- **Title VI Public Notices:** Notices are posted in readily accessible locations on all MAX revenue vehicles, ensuring that drivers understand our obligations and passengers understand their rights. Program notices are displayed outside the door of the Administration Office, and are posted on MAX's website;
- **Authority Board Meetings:** Board meetings are held monthly and the public is invited to attend; a comment period is scheduled at the start of meetings; meeting locations are ADA-accessible and can be reached using public transportation; schedules are posted on MAX's website and outside the main office. Open board seats are communicated directly to area organizations serving female, minority, and/or low-income persons in effort to further diversify board representation;
- **Local Advisory Council:** The LAC meets nine (9) times annually. Membership is made up of persons from the community and users of public transportation, representing varying demographic profiles; a comment period is scheduled near the start of each meeting; meeting locations are ADA-accessible and can be reached using public transportation; schedules are posted on MAX's website;
- **Travel Trainings:** MAX regularly hosts travel training classes meant to educate and seek service feedback from potential customers and their caregivers on MAX services. The classes are held at locations that are ADA-accessible and have access to public transportation; Spanish-language interpretation is also available;
- **Regional Partnership:** MAX's local MPO—the Macatawa Area Coordinating Council (MACC)—in the development of the area's Long-Range Transportation Plan (LRTG) and Transportation Improvement Program (TIP). The MACC's public participation processes satisfy MAX's public participation requirements for its Program of Projects, and ensures that existing and future expenditures for transportation projects and programs are based on a continuing, cooperative, and comprehensive planning process;
- **Language Outreach:** Spanish-language service schedules and brochures are provided. Additionally, at least one (1) Spanish-speaking phone operator is available at the main call center on a regular basis;
- **Customer Comment/Complaint Process:** Persons may call the main MAX phone number at 355-1010 to place a formal complaint, or to comment on current, proposed, or recommended service changes. Comment/Complaint forms are made available on transit service vehicles, at the main office, and electronically on the agency website. Social media outlets (Facebook, Twitter, etc.) offer additional opportunities for soliciting and receiving public feedback.

Since MAX's last submission, the Authority has utilized the following specific outreach activities:

- **Mobility Manager Position:** A newly added position now aims to align local and regional transportation goals in partnership with area social agencies and community groups; this positions helps to identify transportation gaps and barriers or other human service needs in the Holland/Zeeland area.
- **Residential Meetings/Community Events:** Attendance at special gatherings (Ben's Hope Harvest Festival, National Night Out, Juneteenth, Senior Community Day, International Festival of Holland, Momentum Center Family Fun Night); special social programs (SAFE with MAX); City of Holland neighborhood outreach (3Sixty—EastCore & Montello Park Neighbors, Heights of Hope, WestCore Neighbors, Washington School Neighbors, and the Great Lakes Urban Restoration Network) used to gauge community needs or to communicate/seek feedback on transit-related proposals.
- **Local Non-Profit/Business Community Needs:** Helping organizations successfully connect clientele through transit connections (Community Action House, Lighthouse Immigrant Advocates, Ottawa County Dept. of Health & Human Services, Ottawa Food); worker/employment mobility issues (Lakeshore Advantage, LG Chem, Manpower);

- **Public Transit Surveys:** Customer surveys are typically conducted annually—or at a minimum—every three (3) years. Surveys help identify service needs based on the demographic background (collected simultaneously), assisting in the development of improved services. Survey takers travel portions of all service hours and routes (both fixed routes and demand-response). Additionally, surveys are made available electronically on the MAX website; surveys are available in both English and Spanish;
- **Educating the Community:** MAX took part in events for area agencies and non-profits (Benjamin’s Hope, Community Mental Health, Upward Bound Summer Event, Compassionate Heart, Evergreen Commons Community Center), educating them on MAX services and seeking service feedback; the agencies and non-profits serve segments of low-income and minority populations;

The public participation process related specifically to MAX’s Limited English Proficiency provisions is found as a subpart of Section 10 entitled *Public Participation & Dissemination of the LEP Policy*.

MAJOR SERVICE & FARE CHANGE POLICY

MAX will consider public comments before raising fares or carrying out a major reduction in transit services. Public input will be solicited while proposals are under consideration, and affected community members will be notified before the implementation of any major service changes or fare increases.

A full copy of MAX’s *Policy for Public Comment on Fare & Service Changes* is included in APPENDIX I.

SECTION 5: MONITORING OF SUBRECIPIENTS

To ensure that sub-recipients are complying with the DOT Title VI regulations, primary recipients must establish a means to monitor their sub-recipients for compliance with the regulations of 49 CFR 21.9(b). Importantly, if a sub-recipient is not in compliance with Title VI regulations, then the primary recipient is also not in compliance.

At the present time, the Macatawa Area Express Transportation Authority does not utilize sub-recipients for transit services. Should sub-recipients be utilized in the future, the Authority—as a primary recipient—shall develop a schedule of sub-recipient Title VI Program submissions and see that all other required processes are enacted and monitored to ensure full Title VI compliance.

GENERAL TITLE VI PLAN INFORMATION

The MAX Transit Title VI Plan is posted on the website www.catchamax.org. For individuals without internet services, the Herrick Public Library in downtown Holland offers web access free-of-charge. Following updates, the LEP Plan will be provided to local community organizations serving LEP individuals (see Page 25 of the Title VI Plan).

The Plan will be available upon request in hard copy at the Padnos Transportation Center. Requests will also be fulfilled via mail or sent electronically in PDF format over email.

Questions or comments regarding the Title VI or LEP plans should be directed to the Title VI Coordinator:

Charles Veldhoff
Data Analyst/EEO Officer

Macatawa Area Express Transportation Authority
171 Lincoln Avenue
Holland MI 49423

Phone: 616.928.2494

Fax: 616.928.2467

Email: c.veldhoff@catchamax.org

SECTION 6: TITLE VI MINORITY REPRESENTATION NON-ELECTED BOARDS & COUNCILS

The Macatawa Area Express has been working to more broadly diversify representation on its non-elected boards and councils as vacancies become available. Since Summer 2019, a Hispanic/Latinx member has joined the Authority Board.

Although these steps were small, continued and additional efforts will be made to further diversify board and council membership with the goal to more truly represent the overall service-area population profile, and that as well of Holland/Zeeland-area transit users.

The following tables reference, respectively, the proportion of non-elected planning boards and councils consisting of public representation with that of service-area demographic characteristics:

BOARD/COUNCIL	AFRICAN AMERICAN	ASIAN AMERICAN	CAUCASIAN	HISP/LATINX	NATIVE AMERICAN	NATIVE HI. PACIFIC ISLANDER	OTHER RACE/TWO OR MORE RACES
Service Area Population	2.6%	5.2%	66.7%	21.4%	0.2%	0.0%	3.9%
Authority Board	0%	0%	88.9%	11.1%	0%	0%	0%
Local Advisory Council	0%	0.0%	100.0%	0%	0%	0%	0%

Source: U.S. Census Bureau, 2020 Decennial Census.

JURISDICTION	TOTAL	AFRICAN AMERICAN	ASIAN AMERICAN	CAUCASIAN	HISP/LATINX	NATIVE AMERICAN	NATIVE HI. PACIFIC ISLANDER	OTHER RACE/TWO OR MORE RACES
City of Holland	34,378	1,279	913	22,641	8,042	76	30	1,397
Holland Charter Twp.	38,276	998	3,576	21,925	10,122	66	35	1,554
City of Zeeland	5,719	75	93	4,926	425	7	0	193
Park Township	18,625	149	493	15,214	2,124	22	1	622
TOTAL	96,998	2,501	5,075	64,706	20,713	171	66	3,766

Source: U.S. Census Bureau, 2020 Decennial Census.

Efforts will continue to encourage the participation of minorities on MAX committees. Recruiting efforts planned or used in the past to fill open or newly-created board or council seats include:

- Public notice of board or committee vacancies, particularly in media used more heavily by minorities;

- Recruiting ads onboard buses or via social media, encouraging minority representation;
- Outreach to local service organizations, particularly those serving minorities, women, or the disabled;
- Personal inquiry (verbal or written) among informal networks, business partners, or transit users;
- Allowing additional time for vacancies to remain open, to allow “word to get out.”

SECTION 7: SERVICE STANDARDS—VEHICLE LOAD, HEADWAY, ON-TIME PERFORMANCE, & AVAILABILITY

The Federal Transit Administration requires all fixed-route public transportation providers to develop quantitative standards for each transportation mode: vehicle load, vehicle headway, on-time performance, and service availability. Individual public transportation providers set these standards; therefore, these standards will apply to each individual agency rather than across the entire industry.

The Macatawa Area Express Transportation Authority has adopted system-wide service standards for its fixed route and demand-response services. These standards—summarized below—were developed and implemented to better help the Macatawa Area Express in its goal of achieving equity among all transit customers in service design and operations decisions.

VEHICLE LOAD STANDARDS

Load factor is generally expressed as the ratio of passengers to the number of seats on a vehicle, relative to the vehicle’s maximum load point. For example, a 1.0 load factor means that every seat on a 40-seat bus is occupied; and a load factor of 1.3 means that every seat on the bus is full and the number of standees equals 30% of the number of seats on the bus, or approximately 12 standees.

The Macatawa Area Express does not currently operate additional modes (express, B.R.T., van pool, etc.) aside from its hourly fixed-route and demand-response services. Factors used to determine maximum load factors include the following:

- Current and expected fixed route ridership counts;
- Expected standing time during the hourly fixed route headways;
- The number of passenger entry/exit doors available per service vehicle category;
- Internal movement for boarding/alighting passengers, particularly with single-door vehicles.

For the Macatawa Area Express, the average of all loads during peak or off-peak operation should not exceed vehicles’ achievable capacities, which are 33 passengers for a 29’ Gillig Low Floor bus, and 24 passengers for an Arboc Low Floor bus. For vans and minivans used in the provision of revenue service, standees are not permitted; seat capacities are never to be exceeded.

This data is additionally expressed in the tabular format below:

FIXED ROUTE VEHICLE TYPE	SEATED	STANDING	TOTAL	MAXIMUM LOAD FACTOR
29’ Gillig Low Floor 505-513, DD	26	7	33	1.3
26’ Arboc Low Floor 415, 417-19, 701-714, 2715-2716, SD	19	5	24	1.3

NOTE: DD—Double-door vehicles, SD—Single-door vehicles.

VEHICLE HEADWAY STANDARDS

Vehicle headway is defined as the measurement of time between buses on a transit line. At the Macatawa Area Express, service operates on nine (9) fixed routes every 60 minutes (50-55 minutes on-route, 5-10 minutes transfer time)—a frequency of one (1) bus per hour—from early morning to early evening, six (6) days per week. On weekdays, hourly service should begin no later than 6:00 a.m. and continue until 7:00 p.m. On Saturdays, hourly service should begin by 8:00 a.m. and continue until 7:00 p.m.

Additionally, two (2) New Freedom funded fixed routes offer service through late evening. Fixed-route service operates on Route 9 and Route 10 every 60 minutes, six (6) days per week, from 7:00 p.m. to 10:00 p.m. There is no Sunday service.

Fixed route planning and scheduling involves consideration of a number of factors, including but not limited to: transit/pedestrian friendly streets, density of transit-dependent population and activities, relationship to the MAX's long-range service plans, relationship to major transportation developments, land use connectivity, and realized and expected ridership trends and growth rates.

ON-TIME PERFORMANCE

The Macatawa Area Express—in keeping with industry standards—considers a fixed route vehicle on time if it arrives at a bus stop no more than one (1) minute early and no more than five (5) minutes late. The on-time performance definition for demand-response service is the arrival of the vehicle for pickup within the pre-arranged 30-minute window of time. The on-time fiscal year performance goal for the Macatawa Area Express fixed routes and demand-response service is 95% or better (91% or better on an individual fixed route). Programming software allows the transit authority to record, monitor, and tabulate on-time performance.

SERVICE AVAILABILITY

The Macatawa Area Express Transportation Authority will distribute service so **at least 85%** of service area residents are within a ¼ mile walk of fixed route service. Public transit access generally corresponds to major traffic corridors linking urban/suburban areas, and population centers and trip generators in urbanized areas.

IMPORTANT NOTE REGARDING SERVICE AVAILABILITY: Eligibility for door-to-door demand-response service in the Holland/Zeeland area is determined by jurisdictional boundaries rather than a specified mileage distance from fixed-route corridors. In addition, able-bodied full fare passengers (non-disabled, non-senior residents) are eligible for public transportation service anywhere within the service area provided they are more than ½ mile from a fixed route for the payment of \$5.50 per ride.

SECTION 8: SERVICE POLICIES—VEHICLE ASSIGNMENT & TRANSIT AMENITIES

VEHICLE ASSIGNMENT POLICY

The Macatawa Area Express Transportation Authority has guidelines in place regarding the assignment of buses to its fixed routes. As a small urban transit system, daily service-vehicle deployments are made from one centrally-located operations and bus storage facility. Therefore, the assignment and distribution of the vehicle fleet among dispersed locations is not warranted.

All service vehicles provide similar passenger accommodations and amenities—including wheelchair ramps and air-conditioning. Low-floor buses are deployed on all nine (9) fixed routes, including the grant-funded Routes 9 & 10. The assignment of vehicles to routes takes into account the characteristics of the vehicle matched with the operating needs of the route. Double-door, higher-capacity vehicles (buses 505-513) are assigned to all routes—or at a minimum—to routes with higher ridership and more frequent passenger stops (Routes 1, 2, 4, 5, and 6), while routes with lower ridership are sometimes assigned single-door, lower-capacity Arboc Low Floor vehicles

(Routes 3, 7, 8, and 11). The only exceptions to this rule apply to Routes 9 & 10, which exclusively use Arboc Low Floor buses to better aid in the routes' nature as deviated-fixed route service—allowing better maneuverability away from main thoroughfares and side streets.

Additionally—to better maximize available seating capacities—lower capacity Arboc Low Floor buses are used on lower-ridership routes whenever Gillig vehicles are removed from service on higher-ridership routes due to maintenance needs. This rotation of buses allows the larger capacity vehicle to then be reassigned to the higher ridership fixed routes.

TRANSIT AMENITIES POLICY

The Macatawa Area Express has in place a policy regarding the implementation of transit amenities, defined as an investment in property or services that make riding public transportation a more pleasant experience. Transit amenities typically include the installation of such things as bus stop shelters, benches, or trash receptacles, but may also include enhanced signage, transit vehicle improvements, technological upgrades (wireless internet), the design of new services or routes, rider incentive programs, or the locating of transit service facilities.

Factors generally considered in the creation, placement, or installation of transit amenities:

- Availability of funding from federal, state, or local government, or through partnerships with the public;
- Number of passengers using a bus stop, or expected to benefit from the enhancement;
- Community and/or driver/staff input or suggestion;
- Proximity to commercial, medical, or residential areas, or existing, accessible sidewalks;
- Proximity to inbound/outbound portions of a route, or transfer points to other fixed routes;
- Space or property availability for amenity construction—whether within the public right-of-way or through private property legal agreements;
- The physical suitability of placement;
- Overall safety and ease of accessibility.

The Macatawa Area Express believes the most successful public transit improvements are those that fulfill an important community need. Providing an amenity that is in demand by passengers can lead to successful implementation. It remains important as well to consider potential passengers and the amenities that are important to them. Additionally, in the planning and placement of transit amenities, careful consideration and review will always be followed to ensure that all citizens receive equal consideration and experience full participation and benefit without regard to minority and/or low-income status.

SECTION 9: ENVIRONMENTAL JUSTICE POLICY GUIDANCE FOR FTA RECIPIENTS

Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, requires the U.S. Department of Transportation (DOT) and the Federal Transit Administration (FTA), to make environmental justice (EJ) part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of programs, policies, and activities on minority populations and/or low-income populations (collectively “EJ populations”). Environmental justice at FTA includes incorporating environmental justice and non-discrimination principles into transportation planning and decision-making processes as well as project-specific environmental reviews.

In May 2012, DOT issued an updated internal Order, *Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* (DOT Order). The DOT Order updates the Department’s original Environmental Justice Order, which was published April 15, 1997. The DOT Order continues to be a key

component of the Department's strategy to promote the principles of environmental justice in all Departmental programs, policies, and activities.

DOT Order 5610.2(a) sets forth the DOT policy to consider environmental justice principles in all DOT programs, policies, and activities. It describes how the objectives of environmental justice will be integrated into planning and programming, rulemaking, and policy formulation. The DOT Order sets forth steps to prevent disproportionately high and adverse effects to minority or low-income populations through Title VI analyses and environmental justice analyses conducted as part of Federal transportation planning and NEPA provisions. It also describes the specific measures to be taken to address instances of disproportionately high and adverse effects and sets forth relevant definitions.

The updated DOT Order reaffirms DOT's commitment to environmental justice and clarifies certain aspects of the original order, including the definitions of "minority" populations in compliance with the Office of Management and Budget's (OMB) Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity of October 30, 1997. The revisions clarify the distinction between a Title VI analysis and an environmental justice analysis conducted as part of a NEPA review, and affirm the importance of considering environmental justice principles as part of early planning activities in order to avoid disproportionately high and adverse effects. The updated DOT Order maintains the original order's general framework and procedures and DOT's commitment to promoting the principles of environmental justice in all DOT programs, policies, and activities.

The Executive Order directs Federal agencies to identify and address, as appropriate, disproportionately high-and-adverse human health or environmental effects of agency programs, policies, and activities on EJ populations.

The overlap between the statutory obligation placed on Federal agencies under Title VI to ensure nondiscrimination in Federally assisted programs administered by State and local entities, and the administrative directive to Federal agencies under the Executive Order to address disproportionately high-and-adverse impacts of Federal activities on EJ populations explain why Title VI and environmental justice are often paired.

The clear objective of the Executive Order and Presidential Memorandum accompanying the Executive Order is to ensure that Federal agencies promote and enforce nondiscrimination as one way of achieving the overarching objective of environmental justice—a fair distribution of the benefits or burdens associated with Federal programs, policies, and activities.

IMPORTANT NOTE: While Title VI is one tool for agencies to use to achieve the principles of environmental justice, it is important to recognize that Title VI imposes statutory and regulatory requirements that are broader in scope than environmental justice. While there may be overlap, engaging in an EJ analysis under Federal transportation planning and the National Environmental Policy Act of 1969 (NEPA) provisions will not satisfy Title VI requirements, as outlined in FTA's Title VI Circular. Similarly, a Title VI analysis will not necessarily satisfy environmental justice, given that Title VI does not include *low-income populations*. Moreover, Title VI applies to all activities of Federal recipients, not solely those which may have disproportionately high-and-adverse human health or environmental effects on EJ populations.

The remaining pages of this section highlight key aspects of the EJ plan, how it relates overall to Title VI and public transportation, and the steps required of the Macatawa Area Express Transportation Authority—a recipient of FTA financial assistance—in incorporating EJ principles into plans, projects, and activities that receive funding from FTA. The complete FTA circular—*FTA C 4702.1B* [Effective Date: October 1, 2012] is kept on file by the Macatawa Area Express and is available for review and reference as part of its Title VI Program & Procedures.

GUIDING ENVIRONMENTAL JUSTICE PRINCIPLES

The guiding EJ principles followed by DOT and FTA are briefly summarized as follows:

- 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;
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process;
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

ENVIRONMENTAL JUSTICE ANALYSIS

An **EJ analysis** starts with knowing basic socioeconomic information about the people who live and/or work in the community. This information is used to determine whether a proposed activity will affect minority and/or low-income populations, after which a targeted **public engagement plan** can be developed to encourage the full and fair participation by all members of the affected communities. The public engagement plan allows guidance throughout the rest of the analysis as consideration is made to whether the proposed programs, policies, and activities will result in disproportionately high-and-adverse human health or environmental effects on EJ populations.

It is vital that EJ populations are engaged at all stages of project development. The following steps outline the engagement of EJ populations in the transportation decision-making process.

STEP 1: KNOW YOUR COMMUNITY BY ANALYZING DEMOGRAPHIC DATA Creation of a residential demographic profile within the planning or project area using U.S. Census Bureau data—Decennial Census of Population and American Community Survey data. Careful consideration will be used to ensure data is the most up-to-date and reliable while recognizing the purposes for which the data were originally collected, as well as consistency across data sources. Geographic units must be carefully analyzed, to ensure chosen boundaries do not artificially dilute or inflate the affected minority population and/or low-income population.

IMPORTANT NOTE: Disproportionately high-and-adverse effects, not population size, are the bases for environmental justice. A very small minority or low-income population in the project, study, or planning area does not eliminate the possibility of a disproportionately high-and-adverse effect on these populations; EJ determinations are made based on effects, not population size.

STEP 2: DEVELOP A PUBLIC ENGAGEMENT PLAN THAT RESPONDS TO THE COMMUNITY When considering whether a potential effect is “adverse,” it is important to include the community that might be impacted by that effect in the discussion. What one population may perceive as an adverse effect, another may perceive as a benefit. It is also possible that—within the same population—the same action may be perceived by various segments as both an adverse effect and a benefit. The fundamental objective of public engagement programs is to ensure that the concerns and issues of everyone with a stake in transportation decisions are identified and addressed in the development of the policies, programs, and projects being proposed within the community.

The **public engagement process** is made more inviting and user-friendly by writing clear, concise, and understandable documents, and by clarifying the ways for members of the public to provide comments on proposed transportation plans and projects. Examples of methods used to engage the public include:

- Customer comments through passenger surveys and comment cards;
- Internet blogs and websites concerning local public transportation;
- Public meetings, listening sessions, and community forums;

- Public participation/recruitment for major decisions (long-range planning or significant capital projects);
- Non-Traditional Outreach, examples of which include:
 - *Informal Group Meetings:* Existing community group meetings such as neighborhood associations, faith-based coalitions, and advocacy groups;
 - *Digital Media:* Accessible via computer or mobile devices, including social media (e.g., Twitter, Facebook);
 - *Direct Mail Campaigns:* fliers or handbills distributed by postal mail, or at bus stops or transfer centers, or through partnerships with local schools or businesses, or community-based organizations;
 - *Community Led Events:* Hosting information booths at community events or fairs (e.g., Senior Expo, Hope College Move-In Day, etc.);
 - *Partnerships with Community-Based Organizations & Leaders:* (e.g., MAX Local Advisory Council, Latin-Americans United for Progress, Disability Network Lakeshore).

IMPORTANT NOTE: The Macatawa Area Express Transportation Authority is committed to work diligently to engage in meaningful public dialogue with the EJ populations impacted by its plans, projects, or decisions by listening to what EJ populations have to say, responding to their comments and concerns, and incorporating those comments into the transportation process where practicable.

Considerations for the importance of **hosting a successful public meeting** are outlined below:

Successful Public Meetings = (Convenient Location + Convenient Times + Open Format)

Although formal public meetings, hearings, and comment periods are often required under Federal, State, or local laws, the most successful outreach engagement strategy should follow a series of more informal meetings with community groups and smaller gatherings of community members.

Key points to remember when planning public meetings include:

Considering the *location* of the meetings, including whether to hold the meeting in a location that serves the interests of EJ communities, such as community centers, social service organizations, or local schools:

- Is the meeting in a convenient location that is easily accessible by public transit?
- Is the room large enough and comfortable?
- Is the location accessible to persons with disabilities?

The *timing* for the meeting should be designed to allow maximum participation by EJ communities:

- Consider work schedules, school schedules, rush hours, meal hours, and religious worship hours when setting the date and time for the meeting. More than one meeting may be necessary, along with varied times of the meetings;
- Consider whether your community might prefer meetings scheduled for early mornings or weekends.

You should consider the *format* of the meeting to allow maximum input:

- Develop a meeting format that allows everyone to participate if they want to. This may mean setting reasonable time limits for speakers so that a few individuals do not monopolize the meeting;
- Limit your own comments. The purpose of this meeting is to hear from the public;

- Be willing to adapt the room set-up to accommodate the attendees. For example, if 100 people are expected to attend a public meeting, that may require a traditional public meeting set-up (a head table, a podium and rows of chairs, and regulated by an agenda and a 3-minute speaking limit). A meeting with a smaller group may be more informally arranged.

Make the public participation process *accessible to all*:

- Designate a specific employee to accommodate the needs of persons who are linguistically and culturally isolated, as well as persons who have disabilities. There may be obligations under Title VI to provide assistance to persons who do not speak English well or at all;
- When planning accessible public engagement campaigns, it is vital for agencies to consider that people have different learning styles, educational attainment levels, and literacy skills. Therefore, it is a good idea to go beyond the auditory nature of public meetings to include visual and tactile tools and techniques in the overall public engagement strategy.

Communicate clearly during the meeting:

- Assess a group's preferred types of communications prior to the meeting;
- Clearly explain the purpose of the meeting and the steps in the process, including the proposed schedule;
- Provide information in plain language. Make sure technical information and complex policies and procedures are described in layperson's terms rather than jargon;
- Spell out acronyms and define technical concepts and terms; Federal, State, and local transportation planning processes are complex;
- Break the plan or project into pieces; plan public sessions that focus on one part or section at a time.

Provide effective *notice to the community*, including EJ populations, beyond minimum requirements:

- Post on websites, electronic versions of major action documents, proposed transportation plans, and actions by the governing board;
- Use of traditional media sources: local newspapers, radio, television stations;
- Provide a reasonable comment period, with instructions for submitting comments;
- Offer public review during office hours for walk-in customers;
- Use of signage on transit vehicles (internal or external), stations, and bus stops;
- Utilized electronic media for email blasts and social networking posts;
- Posting of notices in Ethnic or Community media.

IMPORTANT NOTE: Consider identifying other ways to engage the public that may be less formal than a public meeting or formal listening session. For example, consider attending meetings held within the community or organized by local advocacy groups or faith-based coalitions.

The following are key considerations in **achieving full public participation** in outreach toward to EJ populations:

- What messages and information will you provide to spark public interest and engagement at the planning stage before project details and spending plans are established?

- Through what means and in what manner will you distribute this information?
- At what stages in the planning process will you engage in outreach and information dissemination?
- How will transportation decision makers learn of issues that are of particular concern to EJ populations?
- How will you use input from the public, including EJ populations, in the planning process, so that their input influences transportation investment decisions?
- How will you evaluate the effectiveness of the public engagement process, including its success in reaching EJ populations?
- Are there barriers to the public engagement process to limited English proficient populations, people with disabilities, etc.? How will you avoid or mitigate those barriers?

STEP 3: CONSIDER THE PROPOSED PROJECT, AND LIKELY ADVERSE EFFECTS AND BENEFITS Determinations of disproportionately high-and-adverse effects include taking into consideration “mitigation and enhancements measures that will be taken and all offsetting benefits to the affected minority and low-income populations, as well as the design, comparative impacts, and the relevant number of similar existing system elements in nonminority and non-low-income areas.

Whether adverse effects will be disproportionately high is dependent on the net results after consideration of the totality of the circumstances. Reasonable efforts should be made to engage members of EJ populations who may be impacted by a proposed project, program, or activity, regardless of whether or not it is considered the proposed activity will have an overall benefit to the community.

Examples of adverse effects and benefits include:

ADVERSE EFFECTS:

- Air and water pollution, soil contamination
- Destruction or disruption of man-made or natural resources
- Adverse impacts on community cohesion or economic vitality
- Noise and vibration
- Effects on property values

BENEFITS:

- Decrease in travel time
- Improved air quality
- Expanded employment opportunities
- Better access to transit options
- Improved quality of transit service
- Increased property values

DETERMINING WHETHER ADVERSE EFFECT WILL BE BORNE BY EJ POPULATION Whether an adverse effect is “disproportionately high” on minority and low-income populations depends on whether that effect is (1) predominantly borne by an EJ population, or (2) will be suffered by the EJ population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-EJ population.

Questions to be considered when determining whether a disproportionately high-and-adverse human health or environmental impact exists include:

- Whether the adverse effects on EJ populations exceed those borne by non-EJ populations?
- Whether cumulative or indirect effects would adversely affect an EJ population?
- Whether mitigation and enhancement measures will be taken for EJ and non-EJ populations?
- Whether there are off-setting benefits to EJ populations as compared to non-EJ populations?

STEP 4: SELECT AN ALTERNATIVE, INCORPORATE MITIGATION AS NEEDED

If after considering the adverse effects and potential benefits of the proposed project it is determined that the proposed project will have a disproportionately high-and-adverse effect on minority populations or low-income populations, it should then be determined whether further mitigation measures or alternatives are practicable, and implement practicable mitigation measures or alternatives, before moving forward with the activity. “In determining whether a mitigation measure or an alternative is ‘practicable,’ the social, economic (including costs) and environmental effects of avoiding or mitigating the adverse effects will be taken into account (DOT Order, section 8.c.).

IMPORTANT NOTE: Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin. Accordingly, a program, policy, or activity that will result in a disparate impact as to one of these protected classes may be carried out only if: (1) the recipient can demonstrate a substantial legitimate justification for the program, policy or activity; and (2) there are no comparably effective, reasonable alternative practices that would result in less disparate impacts.

CURRENT OPERATIONS, MANAGEMENT, AND MAINTENANCE

Environmental justice requires that EJ populations be engaged to obtain feedback on the need for new or expanded transit services, as well as improvements to how existing facilities and services are being operated and maintained; transit providers planning for future service operations should also engage EJ populations, especially when considering possible reductions or restructuring of transit service.

Below are questions to consider in guiding public discussion on how well current operation, management, and maintenance of facilities and services meet the needs of communities, with particular attention to the parity between EJ and non-EJ populations.

- Are transportation facilities and systems maintained to an adequate and equivalent state of good repair in EJ and non-EJ areas?
- Are facilities and services operated to an equivalent degree of safety and reliability in EJ areas as compared with non-EJ areas?
- Is accessibility to key employment, medical, educational, and other opportunities at equivalent levels for EJ and non-EJ populations?
- Are newer vehicles placed on routes based on ridership, age of vehicles being replaced, and other neutral criteria?
- Have you considered EJ concerns when considering sites for maintenance or bus storage facilities?

The Macatawa Area Express Transportation Authority’s planning process continues to monitor and survey the use of transportation facilities and services, the demographic characteristics of transit customers, the performance of the systems, and how patterns of exceptional and inferior performance are experienced by customers.

ENVIRONMENTAL IMPACT STATEMENTS, ENVIRONMENTAL ASSESSMENTS, AND CATEGORICAL EXCLUSIONS

An **Environmental Impact Statement (EIS)** is required for major Federal actions significantly affecting the quality of the human environment. Proposed actions in which the significance of the environmental impact is not clearly established are analyzed in an **Environmental Assessment (EA)**. EAs are important analytical tools, intended to aid in the determination of significance of the effects of a proposed action. The scale of EAs usually depends on the relative significance of the projected impacts.

An EIS or EA should include the following components:

- Provide a description of the EJ populations within the study area affected by the project, if any, and a discussion of the method used to identify this population (e.g., analysis of Census data, minority business directories, direct observation, or public involvement process);
- A discussion of all adverse effects of the project both during and after construction that would affect the identified minority and low-income populations;
- A discussion of all positive effects that would affect the identified minority and low-income populations, such as an improvement in transit service, mobility, or accessibility;
- A description of all mitigation and environmental enhancement actions incorporated into the project to address effects, including, but not limited to, any special features of the relocation program that go beyond the Uniform Relocation Act and address adverse community resources destroyed by the project;
- A discussion of the remaining effects, if any, and why further mitigation is not proposed;
- For projects that travel through predominantly minority and low-income and predominantly non-minority and non-low-income areas, a comparison of mitigation and environmental enhancement actions that affect predominantly low-income and minority areas with mitigation implemented in predominantly non-minority or non-low-income areas.

An EJ analysis should include a discussion of the consideration of the affected community's views on the project and the potential benefits and burdens of the project, and alternatives that have less impact on EJ populations.

Categorical Exclusions are actions that do not individually or cumulatively have a significant environmental effect. Activities classified as a categorical exclusion are projects that:

- Do not induce significant impacts to planned growth or land use for the area;
- Do not require the relocation of significant numbers of people;
- Do not have a significant impact on any natural, cultural, recreational, historic or other resource;
- Do not involve significant air, noise or water quality impacts;
- Do not have significant impacts on travel patterns; or
- Do not otherwise either individually or cumulatively have any significant environmental impacts.

Examples of transit activities listed under documented categorical exclusions (23 CFR § 771.117 (d)) include the construction of new bus storage and maintenance facilities in areas used predominately for industrial or transportation purposes where such construction is not inconsistent with existing zoning, or certain rehabilitation or reconstruction of existing rail and bus buildings. As a part of the documentation process, the potential impacts on members of EJ populations will need to be considered and information provided to support the EJ analysis. The scope of the documents and analysis required will vary depending on the scope of the proposed project. The Regional Office will offer assistance in determining what additional documentation or studies may be required before a determination of the classification of the action.

If a proposed activity involves unusual circumstances, such as substantial controversy on environmental grounds or inconsistencies with Federal, State, or local laws, the project may need to be evaluated with additional documentation, including possibly an environmental impact statement or an environmental assessment.

A copy of the transit system's most recent **Title VI Equity Analysis & Environmental Justice Review** is highlighted in APPENDIX H. Future projects will follow similar processes and reporting formats.

SECTION 10: LIMITED ENGLISH PROFICIENCY (LEP) POLICY**BACKGROUND & INTRODUCTION**

On August 11, 2000, the President signed E.O. 13166, "Improving Access to Services for Persons with Limited English Proficiency." The Executive Order requires Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them. It is expected that agency plans will provide for such meaningful access consistent with, and without unduly burdening, the fundamental mission of the agency.

The Executive Order also requires that the Federal agencies work to ensure that recipients of Federal assistance provide meaningful access to their LEP applicants and beneficiaries. Executive Order 13166 applies to all federal agencies, all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies and governments, private and non-profit entities, and sub-recipients.

KEY LIMITED ENGLISH PROFICIENCY POLICY COMPONENTS

Federally assisted recipients are required to make reasonable efforts to provide language assistance to ensure meaningful access for LEP persons to the recipient's programs and activities. To do this, the recipient should:

1. Conduct the four-factor analysis;
2. Develop a Language Access Plan (LAP);
3. Provide appropriate language assistance.

The actions that the recipient may be expected to take to meet its LEP obligations depend upon the results of the four-factor analysis including the services the recipient offers, the community the recipient serves, the resources the recipient possesses, and the costs of various language service options. All organizations would ensure nondiscrimination by taking reasonable steps to ensure meaningful access for persons who are LEP.

As part of its Title VI update, the Macatawa Area Express Transportation Authority (MAX) has developed the following Limited English Proficiency Policy. The plan's contents are consistent with the guidance on an effective language implementation plan expressed in Section VII of the U.S. Department of Transportation's Policy Guidance Concerning Recipients' responsibilities to Limited English Proficient (LEP) Persons [Federal Register: December 14, 2005] (Volume 70, Number 239).

The following policy explains to the transit agency staff the need to undertake language assistance activities including the following activities that are recommended in the DOT LEP Guidance on an implementation plan.

The U.S. Department of Justice, Civil Rights Division has developed a set of elements that may be helpful in designing an LEP policy or plan. These elements include:

1. Identifying LEP individuals who need language assistance;
2. Providing language assistance measures;
3. Training staff;
4. Providing notice to LEP persons of the availability of language assistance;
5. Monitoring and updating the LEP Policy.

This policy details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, the training of staff, how to notify LEP persons that assistance is available, and information for future plan updates.

FOUR FACTOR ANALYSIS

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

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of MAX;
2. The frequency with which LEP individuals come in contact with MAX;
3. The nature and importance of the program, activity, or service provided by MAX to the LEP Community;
4. The resources available to MAX and the overall cost.

The greater the number or proportion of eligible LEP persons; the greater the frequency with which they have contact with a program, activity, or service; and the greater the importance of that program, activity, or service, the more likely enhanced language services will be needed. Smaller recipients with more limited budgets are typically not expected to provide the same level of language service as larger recipients with larger budgets. The intent of DOT's guidance is to suggest a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on small organizations and local governments.

Additional details can be found in the Dept. of Transportation issued Policy Guidance Concerning Recipients' Responsibilities to LEP Persons, Federal Register: December 14, 2005 (Volume 70, Number 239).

A summary of the results of the MAX four-factor analysis is contained in the following section:

FACTOR 1: THE PROPORTION, NUMBER, AND DISTRIBUTION OF LEP PERSONS

The U.S. Census Bureau's *2021 American Community Survey 5-Year Estimates* has a range of four classifications of how well persons speak English. For planning purposes, we are considering people that speak English less than "very well" as Limited English Proficient persons.

Table 1: Population 5 Years Old & Older Speaking a Language Other than English at Home, with any change from the last plan update noted in parenthesis.

JURISDICTION	POPULATION 5 YEARS OLD & OLDER (GAIN/LOSS)	SPEAK A LANGUAGE OTHER THAN ENGLISH AT HOME (GAIN/LOSS)	PERCENT SPEAKING A LANGUAGE OTHER THAN ENGLISH AT HOME (DIFFERENCE +/-)
HOLLAND, CITY OF	32,392 (+940)	5,111 (-466)	15.8% (-1.9)
HOLLAND CHARTER TWP.	36,045 (+597)	8,834 (-1,663)	24.5% (-5.1)
ZEELAND, CITY OF	5,350 (+240)	227 (-215)	4.2% (-4.5)
PARK TWP.	17,716 (-80)	1,504 (-49)	8.5% (-0.2)

Table 2: Among the Languages Spoken at Home, the Proportion of Population 5 Years Old or Older Speaking English Less Than “Very Well.”

	SPANISH, SPEAKING ENGLISH LESS THAN “VERY WELL.”	OTHER INDO- EUROPEAN, SPEAKING ENGLISH LESS THAN “VERY WELL.”	ASIAN & PACIFIC ISLANDER, SPEAKING ENGLISH LESS THAN “VERY WELL.”	OTHER LANGUAGES, SPEAKING ENGLISH LESS THAN “VERY WELL.”
HOLLAND, CITY OF	3.9% (-1.2)	0.1% (0.0)	0.9% (+0.2)	0.1% (-0.1)
HOLLAND CHARTER TWP.	5.7% (-1.5)	0.8% (+0.1)	3.4% (-0.5)	0.1% (+0.1)
ZEELAND, CITY OF	1.1% (-1.0)	0.5% (-0.6)	0.0% (-0.1)	0.0% (0.0)
PARK TWP.	2.5% (+0.8)	0.2% (-0.1)	0.7% (-0.1)	0.0% (0.0)

FACTOR 2: THE FREQUENCY WITH WHICH LEP INDIVIDUALS COME INTO CONTACT WITH THE SERVICE

An established Latinx/Spanish-speaking community resides within the MAX service area, the population primarily concentrated within the city limit of Holland and in portions of Holland Charter Township, with fewer numbers reported within the city limit of Zeeland and in Park Township. MAX assessed the frequency with which staff and drivers have—or could have—contact with LEP persons, and includes vehicles operators, dispatchers, supervisory staff, and customer service representatives.

To date the most frequent contact between LEP persons is with bus drivers, and customer service staff that either field incoming phone calls or handle walk-in customers at the front desk. Currently, MAX employs four (4) bus drivers, one (1) Road Supervisor, one (1) Utility Supervisor, and one (1) Administration staff (Executive Director) who are bilingual in Spanish; four (4) bilingual telephone operators assist Spanish-speaking LEPs at the main passenger transfer and service center—at nearly all times, at least one is available during daily service hours.

Reserve-A-MAX travel training is also available upon request, with a Spanish-speaking staff member provided when requested, and is made available free-of-charge.

As part of its Limited English Proficiency Policy, MAX will work with staff to recognize, identify, and record the frequency with which persons identified as specific Asian language-speaking LEPs (with fewer but notable numbers within the service area, primarily in Holland Township) come into contact with MAX staff.

Possible contact points include but are not limited to: Community marketing events, telephone inquiries, service center walk-in visits, day-to-day bus route operations, or written or verbal inquiries or outreach, formal or informal, from related local groups and organizations. Based upon findings and occurrences, including ongoing demographic trends, MAX will routinely evaluate the need and feasibility of providing print information and/or direct language assistance in specific languages other than English and Spanish as part of its LEP program reviews.

FACTOR 3: THE NATURE AND IMPORTANCE OF THE SERVICE PROVIDED TO THE LEP COMMUNITY

Without a conscious effort from federal recipients to make available adequate and necessary information to all persons, some populations may not have fair and equal access to important, perhaps life-saving services. MAX recognizes that access to transportation is crucial to many populations, regardless of background.

As the provider of public transportation for the greater Holland-Zeeland area, MAX does not provide direct emergency services or assistance to the community in situations that potentially have serious or life-threatening implications on an LEP individual, especially compared to services such as health, emergency transportation, utilities, fire/police protection, and other emergency services.

The Macatawa Area Express Transportation Authority does understand its role within the community and operates in full agreement with the U.S. Department of Transportation's Limited English Proficiency Guidance Section V (4) recognizing that the inability of an LEP person to effectively utilize public transit (due to a language barrier) could in fact adversely affect his or her ability to obtain quality health care, child care, education, or access to employment opportunities within the service area.

Based on the demographic analysis and the frequency of contact with the available services, MAX considers access to its fixed routes and demand-response services within the local service area as essential with respect to the area's LEP population. MAX will continue to assess the relative impact of these services on LEP individuals and employ effective means to provide language assistance for LEP persons to ensure meaningful access.

HOLLAND-AREA ORGANIZATIONS SERVING LIMITED ENGLISH PROFICIENCY (LEP) INDIVIDUALS

The listing below identifies organizations MAX has either partnered with in the past or has contacted seeking input on its LEP Policy and whether any issues or barriers are known to exist with respect to local transit services. Copies of the LEP Policy will be submitted at least annually to each organization listed below both for awareness purposes and to open the Policy as well to public feedback—all to better serve the community as a whole:

Holland Public Schools, Melissa Remillard, Assistant Superintendent of School Improvement

320 W. 24th St., Holland MI 49423
616.494.2017, mremilla@hollandpublicschools.org

Lakeshore Ethnic Diversity Alliance, Gloria Lara, Executive Director

PO Box 2945, Holland MI 49422
616.846.9074, g.lara@ethnicdiversity.org

Lao Christian Reformed Church, Lee Khang, Reverend

940 Royce Ave., Holland MI 49423
616.719.7319, lee.khaab@gmail.com

Latin Americans United for Progress, Johnny Rodriguez, Executive Director

430 W. 17th St., Suite 31, Holland MI 49423
616.888.7225, johnny@laup.org

Lighthouse Immigrant Advocates, David Lee, Advancement Director

412 W. 24th St., Holland MI 49423
616.298.8984, dlee@lia-michigan.org

FACTOR 4: THE RESOURCES AVAILABLE AND THE OVERALL COST

Although current resources remain limited, MAX continues to provide Spanish-language translations that are included or available separately in bus schedules, brochures, service announcements, and pre-street closure bus stop notices. Bilingual staff also assist Spanish-language LEP persons, and these same staff members attend or accompany others to selected community events and outreach opportunities where the need for their skills is expected. MAX has Spanish-language "vital" documents and translation of its website (which now includes multiple languages) as part of its LEP planning.

Because the remaining LEP population in the service area does not currently represent a single yet sizeable proportional group of individuals, no further language assistance is planned; demographic trends and frequency of contact will be monitored and incorporated into the Macatawa Area Express LEP Policy review process.

IDENTIFYING LEP INDIVIDUALS WHO NEED LANGUAGE ASSISTANCE

To help identify and record the primary language of a Limited English Proficiency individual, MAX staff will make use of a language identification listing during any such initial encounters, and to report the encounter directly to the transit system's Title VI coordinator. Additionally, review of the translation service billing cycle will be used as a system double-check, which lists encounter dates, times, and languages used.

The official listing to be utilized by MAX Transit, the 2004 Census Test Language Identification Flashcard, has been developed by the U.S. Census Bureau and contains a check box with the phrase "Mark this box if you read or speak (name of each language)" listed in 38 different languages. The flashcard is used by governmental and non-governmental agencies to identify the primary language of LEP individual during face-to-face contacts. The Language Identification Flashcard has been made available at the front desk of the MAX Transit main transfer station, the Padnos Transportation Center.

MAX staff are also instructed to utilize the Language Identification Flashcard and to report any contacts made during other instances where LEP contact may occur, such as public meetings, workshops, or community events.

Documentation forms for reporting LEP contact are found in the LEP Plan binders for office staff use, and additionally on each bus driver's daily time sheets. These forms are reviewed by the Title VI coordinator, directly to whom LEP contacts can also be reported. Through the use of such cards and double-checks, MAX Transit will be better able to record any contact with an LEP individual.

PROVIDING LANGUAGE ASSISTANCE MEASURES

In compliance with the "safe harbor" threshold, Spanish-language assistance will be provided for LEP individuals through the translation of key or "vital" documents and materials, as well as through oral language interpretation when necessary and when possible. Translation of all MAX Transit plans and materials is not possible due to cost restrictions and secondary population levels that do not warrant such measures.

MAX Transit continues to provide Spanish-language bus schedules, bus stop pre-closure notices, and "how to" guides among its inventory of translated brochures. In addition, the transit system's website offers a Spanish-translation version—as well as ten (10) additional language options—through the use of translation software.

Spanish-language staff are available to assist with written communications and document translation requests. Spanish-language staff members also assist customers who are Spanish-speaking LEPs.

Beyond this scope, MAX has contracted with AAA Translation to provide language translations services in more than 150 languages. Additionally, Google Translate—a free, web-based translation service—is available for use by either office staff, or by MAX bus operators, accessed through onboard vehicle tablets.

As part of the LEP Policy, "vital" documents (those documents deemed necessary to understanding the transit system's policies and safety measures, and for utilizing all available services) have been identified and translated into Spanish. Examples of these documents include the demand-response No-Show Policy, No-Show infraction letters, Title VI policies and complaint forms, ADA Assessment Applications, holiday-related service notices, and the MAX system's general Comment/Complaint form.

Since MAX is unable to determine which recipients of No-Show letters might be LEPs, the English version of the letter contains a line in Spanish notifying the reader to call the offices to request a Spanish-Language letter. A similar format will be used on future documents routinely mailed and have been deemed "vital" by the MAX Transit system.

Written correspondence, regardless of language, is to be directed through the Data Analyst/EEO Officer, where the document can be translated either through internal or external sources. A professional response or action

can be determined, and a translation made back into the original language for return to the original LEP individual.

Since 2008, MAX Transit has recorded contacts with LEP individuals other than Spanish-speaking LEPs:

- (2) Mandarin Chinese
- (2) Vietnamese
- (1) Cantonese Chinese
- (1) Laotian
- (1) Brazilian Portuguese
- (1) Polish
- (1) Urdu
- (4) Spanish*

**Spanish-speaking staff members were unavailable for translation assistance.*

During the above documented encounters, use of the Language Identification Flashcard, and Google Translate or the AAA Translation service assisted staff in meeting each LEP's needs. When needed, the transit system has selected and continues to provide for financially, on an on-demand basis (rather than under contract), the following organization for language interpretation services, for no cost to Limited English Proficiency individuals:

AAA Translation
17295 Chesterfield Airport Rd., Suite 200
Chesterfield MO 63005
888-263-0481
www.aaatranslation.com

No complaints were received in the preceding four (4) years concerning MAX's failure to meet LEP needs.

TRAINING OF STAFF

Members of the MAX Transit staff will be made aware of their obligations to provide meaningful access to information and services for Limited English Proficiency individuals, and will be properly trained. MAX will provide an LEP review for current employees on an annual basis and will include LEP training as part of the new employee orientation process. Management staff will also be made aware of the processes in place so they can reinforce its importance and ensure its implementation by staff.

Staff training will include, but is not limited to the following:

- Understanding the Title VI LEP responsibilities;
- Background on LEP populations within the service area;
- Description of the type of language assistance MAX currently provides, including use of the LEP language identification flashcards;
- How to use the AAA Translation and Google Translate language assistance services;
- Documentation of LEP language assistance requests;
- How to handle a potential Title VI / LEP complaint.

In key areas, the step-by-step instructions in the following section have been outlined—and as part of training—will be distributed to all transit system Customer Service and Bus Operator staff in event contact is received from an LEP person in need of interpretation services.

INSTRUCTIONS FOR LANGUAGE INTERPRETATION ASSISTANCE**BUS OPERATORS:**

It may be difficult for a non-bilingual bus operator to provide assistance to a Limited English Proficiency person who boards the vehicle requesting information.

In such circumstances, bus operators are **required** at a minimum to:

1. Ask if another passenger on the vehicle could serve as a translator;
2. Provide the phone number to the agency's transfer center customer service desk, which will provide translation services;
3. Direct the LEP person to a translated schedule placed aboard the vehicle;
4. If a riding passenger, direct them to the transfer center, where language assistance is available.

GOOGLE TRANSLATE: Translations can be accessed via your onboard vehicle tablets.

PLEASE NOTE: COMPLETE INSTRUCTIONS ARE AVAILABLE IN APPENDIX J.

Things to keep in mind when using Google Translate:

1. You may need to try different languages if initially unknown;
2. Use short, simple terms for translation (translations can be read visually and/or read audibly);
3. **IMPORTANT!** Document the encounter by completing the Title VI/LEP section on the bottom of your Driver's Sheet (see Page 29).

CUSTOMER SERVICE/PHONE OPERATORS:

NOTE: It is against federal law to charge any service fees to a Limited English Proficiency individual. All associated fees must be paid for by Macatawa Area Express (MAX).

AAA TRANSLATION (AVAILABLE IN ADDITION TO GOOGLE TRANSLATE):

If an interpreter is unavailable in the office, follow the instructions shown below. It only takes four simple steps to get connected with an interpreter:

Step 1

Use the Language Flashcard to identify the customer's language.

Step 2

Call AAA Translation: 1-888-263-0481

Step 3

Enter MAX Transit's PIN Code, and you'll be speaking with an Interpreter within seconds.

Step 4

Remember to document the LEP encounter with the form shown on Page 29.

*This service is recommended for all non-emergency situations.

AAA Translation offers:

- Language interpreting & translation services for more than 150 languages.
- U.S. cost is \$2.25 per minute, billed in one-minute increments.
- 24 hours, 7 days a week, 365 days a year.
- On-demand, pay-as-you-go service plan.

POLICY REGARDING THE USE OF INTERPRETERS/TRANSLATORS

IMPORTANT: Interpreters and translators should not deviate into a role as counselor, legal advisor, or any other role aside from interpreting or translator.

General Guidelines:

1. Be sure to always speak directly to your customer, not to the interpreter;
2. Always use words, not body language or gestures, to convey meaning;
3. Speak audibly and in a positive tone;
4. Always speak slowly and clearly;
5. Do not allow the customer to wait alone, or over extended periods;
6. Be prepared to explain technical terms or jargon to the interpreter, especially if the interpreter is unfamiliar with mass transit;
7. When communicating, be sure to use simple vocabulary and easy-to-understand terms;
8. Use short sentences, pausing frequently to allow the interpreter to speak;
9. Ask one question at a time;
10. Do what you can to control the environment.

To help assist the customer, remember to keep the following in mind:

1. Ask your customer if they feel they understand your question and if they need to ask any questions themselves;
2. Ask your customer if they need anything re-explained. If your message is not clearly understood, be prepared to say it differently;
3. If you think that your message may not be fully understood by your customer, double check by saying "Tell me what you understand."

To help assist the interpreter, remember to keep the following in mind:

1. Allow the interpreter the time needed to provide the clearest interpretation;
2. Allow the interpreter to stop you and seek clarification when appropriate;
3. Allow the interpreter to take notes if things get complicated;
4. Allow the interpreter to clarify cultural issues, if necessary.

LISTING OF BILINGUAL STAFF

<u>Name:</u>	<u>Job Title:</u>	<u>Language:</u>
Junior Beltran	Bus Operator	Spanish
Jacinto Flores	Bus Operator	Spanish
Elisa Hoekwater	Executive Director	Spanish
Leandro Montes	Bus Operator	Spanish
Nicandro Sanchez	Utility Supervisor	Spanish
Andrea Rubio	Information Specialist	Spanish
Jacob Trevino	Road Supervisor (AM)	Spanish
Alyssa Valderas	Information Specialist	Spanish
Jessica Valderas	Information Specialist	Spanish
Tawney Valderas	Info. Specialist/Human Resources Assistant	Spanish
Noe Ybarra	Bus Operator	Spanish

LIMITED ENGLISH PROFICIENCY (LEP) CONTACT DOCUMENTATION FORM:

LEP Documentation Form:

Date of contact ____/____/____

Location of contact: _____

Name of staff member filling out form: _____

Indicate language of LEP customer: SPANISH Other: _____

Did the LEP customer purchase a bus pass? (Circle one) YES NO

How were the LEP language needs met? (Circle one) MAX TRANSLATOR AAA TRANSLATIONS GOOGLE TRANSLATE

Please describe the nature of the LEP customer's visit:

Were their needs met by the end of the visit? YES NO

Return completed form to: Charles Veldhoff, Compliance Analyst/EEO Officer

LEP Documentation Form/Bus Operators (SHOWN IN YELLOW BELOW ON THE FIXED ROUTE FORM):

MAX TIME RECORD SHEET FIXED ROUTE													
DATE	ROUTE	BUS NO	DRIVER NAME										
AM ROUTE					PM ROUTE								
TIME					TIME								
CLOCK IN	<input type="text"/>	Odometer			CLOCK IN	<input type="text"/>	Odometer						
DEPART GARAGE	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	DEPART FIXED RTE END	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>				
ARRIVE FIXED RTE START	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	ARRIVE AT GARAGE	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>				
CLOCK OUT	<input type="text"/>				CLOCK OUT	<input type="text"/>							
FUEL STOPS					BUS SWITCH OUT								
	BUS #	GALLONS	MILEAGE	TIME IN	TIME OUT	BUS #	TIME IN	TIME OUT	BEG ODOM	END ODOM			
BUS 1													
BUS 2													
BUS 3													
OTHER DRIVER INFORMATION													
CHECK ALL LIGHTS	<input type="checkbox"/>					Google Translate - TITLE VI/LEP DOCUMENTATION							
LOG OFF TABLET	<input type="checkbox"/>					Which Language required Translation? _____							
POWER TABLET DOWN	<input type="checkbox"/>					Were you able to successfully assist the passenger today? YES NO							
COMPLETE PAPERWORK	<input type="checkbox"/>					Which Language required Translation? _____							
DID YOU HAVE A LUNCH?	YES / NO					Were you able to successfully assist the passenger today? YES NO							
LUNCH START:	<input type="text"/>					Which Language required Translation? _____							
LUNCH END:	<input type="text"/>					Were you able to successfully assist the passenger today? YES NO							
HOURLY WALKTHROUGH CHECKS													
<input type="checkbox"/> 6AM	<input type="checkbox"/> 7AM	<input type="checkbox"/> 8AM	<input type="checkbox"/> 9AM	<input type="checkbox"/> 10AM	<input type="checkbox"/> 11AM	<input type="checkbox"/> 12PM	<input type="checkbox"/> 1PM	<input type="checkbox"/> 2PM	<input type="checkbox"/> 3PM	<input type="checkbox"/> 4PM	<input type="checkbox"/> 5PM	<input type="checkbox"/> 6PM	<input type="checkbox"/> 7PM

NOTICE OF THE AVAILABILITY OF LANGUAGE ASSISTANCE

The Macatawa Area Express (MAX) has established the following methods to inform Spanish-speaking LEP individuals, supporting organizations—as well as the general public—of available no-fee LEP services.

- An English/Spanish sign (see sample in APPENDIX A) has been incorporated into the Title VI statement and has been posted at the front entrance of the transit system’s central transfer center. The notice will also allow for LEPs traveling between cities to learn of language interpretation services. The central transfer center also serves Amtrak passengers and inter-city bus lines. In the past, MAX Transit staff has assisted Spanish-speaking LEPs using transportation other than our own, and will continue to do so when needed;
- A phrase in English/Spanish has been added to reprints of the master bus schedules, reminding passengers of the availability of language services offered by MAX Transit, free of charge;
- When possible, MAX Transit will have present at least one Spanish-speaking member of the staff at any public meeting intended for educational purposes or for gathering community input. Spanish-speaking staff will be on-hand to serve LEPs during community marketing events and shows, when possible, especially given scenarios where demographics point to a higher probability of participation by Spanish-speaking LEPs;
- A notice has been posted on the MAX Transit website www.catchamax.org under the “Contact Us” section notifying visitors of the availability of language assistance at no cost to the user. The notice can be translated into ten (10) languages through use of the website’s translation feature;
- On an annual basis MAX will mail/email copies of its LEP Policy to seek input from local organizations who serve the LEP population (list shown on Page 24), while at the same time notifying them of available language services offered by the transit system.

Current budget and staff limitations do not allow for the implementation of all available notification techniques. However, MAX will consider additional notification options in the future, especially those suggested from within the local LEP community.

MONITORING & UPDATING THE LEP POLICY

The Macatawa Area Express Transportation Authority’s Limited English Proficiency Policy has been designed to be flexible and can be easily updated as needed. At a minimum, the LEP Policy will be evaluated and updated on a tri-annual basis.

Each update will include but will not be limited to a review of the following information:

- Feedback and frequency from documentation/recorded LEP encounters;
- Establishing whether or not LEP needs have been met through existing assistance;
- Nature and importance of activities to LEP persons;
- Evaluating local population/demographic changes, particularly among LEPs;
- Feedback from LEP individuals or community organizations, or participation in public meetings;
- A review of whether any complaints have been received;
- Availability of resources and the costs imposed.

PUBLIC PARTICIPATION & DISSEMINATION OF THE LEP POLICY

The Macatawa Area Express will continue cultivating relationships with community agencies that serve LEP populations. LEP engagement may include attending already existing community meetings and gatherings—such as school meetings, farmers markets, faith-based events, and other community activities—in order to reach LEP populations who may not attend hosted events.

Additionally, more directly targeted LEP engagement efforts to be utilized by the Authority include:

- Ensuring that non-English language interpretation will be made at any public meeting or workshop, as is appropriate or necessary;
- Utilizing bilingual postings on all buses and transit-related public facilities;
- Posting any event information in both English and Spanish, as deemed necessary;
- Distributing event information to community groups and agencies that work with LEP populations, through both contact lists and postings on social media;
- Making notices bilingual, or using Spanish-language notices alongside English notices, as deemed necessary;
- As appropriate or necessary, having non-English language interpretation available in additional languages.

MAX will continue assessing the language needs of citizens in its service area through its Language Assistance Plan. As such time—as additional groups with limited English proficiency reach significant numbers—MAX will review this plan and its strategies for engaging with non-English speaking populations.

The public participation process will be augmented with specific outreach activities appropriate for the particular projects, such as additional public workshops, focus groups, and surveys. As funding permits, multiple public hearings or workshops may be held at varying times to accommodate different schedules. Public participation events will be held at central locations close to bus stops, short of accentuating circumstances dictating otherwise. These projects may also require the development of special materials such as fact sheets, newsletters, project webpages, and additional social media and press releases.

MONITORING OF SUB-RECIPIENTS

To ensure that sub-recipients are complying with the DOT Title VI regulations, primary recipients must establish a means to monitor their sub-recipients for compliance with the regulations of 49 CFR 21.9(b). Importantly, if a sub-recipient is not in compliance with Title VI regulations, then the primary recipient is also not in compliance.

At the present time, the Macatawa Area Express Transportation Authority does not utilize sub-recipients for transit services. Should sub-recipients be utilized in the future, the Authority—as a primary recipient—shall develop a schedule of sub-recipient LEP submissions in order to see that all other required processes are enacted and monitored to ensure full LEP compliance.

GENERAL LEP POLICY INFORMATION

The MAX Transit LEP Policy is posted on the website www.catchamax.org. For individuals without internet services, the Herrick Public Library in downtown Holland offers web access free-of-charge. Following updates, the LEP Policy will be provided to local community organizations serving LEP individuals.

The Plan will be available upon request in hard copy at the Padnos Transportation Center. Requests will also be fulfilled via mail, or sent electronically in PDF format over email.

Questions or comments regarding the LEP Policy should be directed to:

Charles Veldhoff
Title VI Coordinator
Macatawa Area Express
171 Lincoln Ave.
Holland MI 49423

Phone: 616.928.2494

Fax: 616.928.2467

Email: c.veldhoff@catchamax.org

APPENDIX A

TITLE VI PUBLIC NOTICE STATEMENT

We can help!

Free language assistance is available. Please proceed to the main office, and MAX staff will promptly assist you.

¡Podemos ayudar!

La ayuda libre del idioma está disponible. Continúe por favor a la oficina principal, y al personal MAX inmediatamente le ayudará.

NOTICE: Your rights under Title VI:

The Macatawa Area Express Transportation Authority operates without regard to race, color, or national origin. To request additional information on MAX's Title VI obligations, please contact the Title VI staff officer at 616-928-2494. A Title VI complaint form can be obtained at the Macatawa Area Express website www.catchamax.org, by calling 616-928-2494, or via mail by writing:

MAX Transit
171 Lincoln Ave.
Holland MI 49423

La NOTA: Sus derechos bajo Titula VI:

El Area de Macatawa Expresa el Transporte operar de Autoridad sin la consideración para competir, colorar, o el origen nacional. Para solicitar información adicional en obligaciones MAX de Título VI, contacta por favor al oficial del personal del Título VI en 616-928-2494. Una forma de la queja del Título VI puede ser obtenida en el sitio web MAX www.catchamax.org, llamando 616-928-2494, o vía el correo escribiendo:

MAX Transit
171 Lincoln Ave.
Holland MI 49423

APPENDIX B

Letter Acknowledging Receipt of Complaint:

Today's Date

Ms. Jane Doe
1234 Holland St.
Holland MI 49423

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against the Macatawa Area Express Transportation Authority, alleging, _____

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by calling (616) 928-2494, or write me at this address.

Sincerely,

Charles Veldhoff
Title VI Program Specialist
Macatawa Area Express Transportation Authority
171 Lincoln Ave.
Holland MI 49423

APPENDIX B (CONT'D)

Letter Notifying Complainant that the Complaint is substantiated:

Today's Date

Ms. Jane Doe
1234 Tulip St.
Holland MI 49423

Dear Ms. Doe:

The matter referenced in your letter of _____ (date) against the Macatawa Area Express Transportation Authority alleging Title VI violation has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. (If a hearing is requested, the following sentence may be appropriate) You may be hearing from this office, or from Federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Charles Veldhoff
Title VI Program Specialist
Macatawa Area Express Transportation Authority
171 Lincoln Ave.
Holland, MI 49423

APPENDIX B (CONT'D)

Letter Notifying Complainant that the Complainant is Not Substantiated:

Today's date

Ms. Jane Doe
1234 Tulip St.
Holland MI 49423

Dear Ms. Doe:

The matter referenced in your complaint of _____ (date) against the Macatawa Area Express Transportation Authority, alleging, _____ has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964 had in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving federal financial assistance.

The Macatawa Area Express Transportation Authority has analyzed the materials and facts pertaining to your case for evidence of the Authority's failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

I therefore must advise you that your complaint has not been substantiated and that I am closing this matter in our files.

If dissatisfied with this final written decision by the Macatawa Area Express Transportation Authority, you do have the right to (1) appeal the decision to MAX's Executive Director, and/or (2) file a complaint externally with the U.S. Department of Transportation:

Office of Civil Rights
Federal Transit Administration
East Building-5th Floor TCR
1200 New Jersey Ave SE
Washington DC 20590

Or by calling 888-446-4511, 8:30am-5:00pm ET, Monday-Friday.

Sincerely,

Charles Veldhoff
Title VI Program Specialist
Macatawa Area Express Transportation Authority
171 Lincoln Ave.
Holland, MI 49423

APPENDIX C

MACATAWA AREA EXPRESS TRANSPORTATION AUTHORITY

TITLE VI COMPLAINT FORM

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that “no person in the United States shall, on the ground of **race, color, or national origin**, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” (42 U.S.C. Section 2000d).

The Environmental Justice component of Title VI guarantees fair treatment and meaningful involvement for all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Executive Order 12898 directs the Macatawa Area Express to make achieving environmental justice part of its mission by identifying and addressing—when appropriate—disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations, and to undertake reasonable steps to ensure that Limited English Proficiency (LEP) persons have meaningful access to the programs, services, and information provided by the Macatawa Area Express.

In order to be processed, signed original complaint forms must be mailed or hand delivered to:

Macatawa Area Express Transportation Authority
 Attention: Title VI Specialist
 171 Lincoln Ave.
 Holland MI 49423

Upon request, reasonable accommodations will be made for persons who are unable to complete the complaint form due to disability or Limited English Proficiency. A complaint may also be filed by a representative on behalf of a complainant.

Section I:		
Name:		
Address:		
City:	State:	ZIP Code:
Email Address:	Home Phone:	Work Phone:
Section II:		
Did anyone else witness the incident? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Please list any witnesses, including name, address, and phone number (use a separate sheet if necessary):		

APPENDIX C (CONT'D)

Section III:

I believe the discrimination I experienced was based on (check all that apply):

Race Color National Origin Other: _____

Date of Alleged Discrimination (Month, Day, Year): _____

Explain as clearly as possible what happened and why you believe discrimination has occurred. Please provide dates, location, and time of discrimination. Use additional sheets as necessary.

Indicate the person(s) you believe responsible for the discrimination (if known):

Name(s):

Work Location (if known):

Section IV:

Have you previously filed a Title VI complaint with this agency? Yes No

Section V:

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

I hereby swear/affirm that the information provided in this TITLE VI Complaint Form is true and correct to the best of my knowledge.

Signature:

Date:

Please submit this form in person at the address below, or mail this form to:

Macatawa Area Express Transportation Authority
Attention: Title VI Specialist
171 Lincoln Ave.
Holland, MI 49423
Phone: (616) 928-2494
Email: info@catchamax.org

INTERNAL USE ONLY:

Date Received:

Signature/Title VI Specialist:

APPENDIX C (CONT'D)

MACATAWA AREA EXPRESS TRANSPORTATION AUTHORITY

FORMULARIO DE QUEJA DE TÍTULO VI

Título VI de la ley de derechos civiles de 1964 prohíbe la discriminación por raza, color u origen nacional en programas y actividades que reciben asistencia financiera Federal. Específicamente, Título VI establece que "ninguna persona en los Estados Unidos por motivos de **raza, color u origen nacional**, podrá ser excluida de participar en, ser negada los beneficios de o ser sometida a discriminación bajo ningún programa o actividad que reciba asistencia financiera Federal." (42 U.S.C. sección 2000d).

El componente de justicia ambiental del Título VI garantiza un trato justo y la participación significativa de todas las personas independientemente de su raza, color, origen nacional o ingresos en relación con el desarrollo, implementación y ejecución de políticas, normas y leyes ambientales. Orden Ejecutiva 12898 dirige el Area de Macatawa Express para hacer lograr justicia ambiental de parte de su misión por identificar y abordar — cuando proceda — salud humana desproporcionadamente alta y adversa o efectos ambientales de sus actividades, programas y políticas sobre minorías y las poblaciones de bajos ingresos y para llevar a cabo los pasos razonables para asegurar que las personas de Dominio de Inglés Llimitado (LEP) tengan un acceso significativo a los programas, servicios e información proporcionada por el Area de Macatawa Express.

Para poder ser procesado, formularios de queja original firmada deben ser enviadas o entregada mano a:

Macatawa Area Express Transportation Authority
 Atención: Título VI Especialista
 171 Lincoln Ave.
 Holland MI 49423

A petición, se harán adaptaciones razonables para las personas que son incapaces de completar el formulario de queja debido a incapacidad o habilidad limitada en inglés. Una queja también puede ser presentada por un representante en nombre de una queja.

Section I:		
Nombre:		
Direccion:		
Ciudad:	Estado:	Codigo Postal:
Direccion Electronica:	Teléfono en Casa:	Teléfono de Trabajo:
Section II:		
¿Nadie presencié el incidente? <input type="checkbox"/> Si <input type="checkbox"/> No		
Por favor liste cualquier testigo, incluyendo nombre, dirección y número de teléfono (utilice una hoja de papel si es necesario):		

APPENDIX C (CONT'D)

Section III:	
<p>Creo que la he experimentado la discriminación se basa en (marque todas las que apliquen):</p> <p><input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen Nacional <input type="checkbox"/> Otro: _____</p> <p>Fecha de la supuesta discriminación (mes, día, año): _____</p> <p>Explicar lo más claramente posible qué sucedió y por qué crees que la discriminación se ha producido. Por favor proporcionar fechas, lugar y tiempo de discriminación. Utilice hojas adicionales si es necesario.</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>Indicar a la persona o personas que se cree responsable de la discriminación (si lo conoce):</p> <p>Nombre(s): _____</p> <p>Lugar de trabajo (si lo conoce): _____</p>	
Section IV:	
<p>¿Usted ha presentado una demanda de Título VI con esta Agencia anteriormente? <input type="checkbox"/> Si <input type="checkbox"/> No</p>	
Section V:	
<p>Puede adjuntar cualquier material escrito o cualquier otra información que usted piensa que es relevante para usted denuncia.</p>	
<p><i>Yo por la presente Juro/afirmo que la información proporcionada en este Título VI queja es verdadera y correcta.</i></p>	
<p>Firma: _____</p>	<p>Fecha: _____</p>

Por favor, envíe este formulario en persona en la siguiente dirección, o envíe por correo este formulario:

Macatawa Area Express Transportation Authority
 Atención: Título VI Especialista
 171 Lincoln Ave.
 Holland MI 49423
 Teléfono: (616) 928-2494
 Dirección electrónica: info@catchamax.org

INTERNAL USE ONLY:	
Date Received: _____	Signature/Title VI Specialist: _____

APPENDIX D

PADNOS CENTER MONITORS NOTICE (W/SPANISH—BEGINNING FY2019)**MACATAWA AREA EXPRESS TRANSPORTATION AUTHORITY****Know Your Rights****Title VI – Civil Rights Act of 1964**

MAX operates without regard to race, color, or national origin. Information on MAX's Title VI obligations—including a Title VI complaint form—can be obtained by calling 616.928.2494, going to the MAX website: www.catchamax.org, or by visiting or writing the MAX main office:

Title VI Staff Officer
Macatawa Area Express
171 Lincoln Ave.
Holland MI 49423

SERVICE VEHICLE NOTICE (W/SPANISH — ALL NEW BUSES BEGINNING FY2019)

Title VI – Civil Rights Act of 1964

Your Title VI Rights

MAX operates without regard to race, color, or national origin. Information on MAX's Title VI obligations—including a Title VI complaint form—can be obtained by calling 616.928.2494, going to the MAX website www.catchamax.org, or by visiting or writing the MAX main office:

Title VI Staff Officer
Macatawa Area Express
171 Lincoln Ave.
Holland MI 49423

Sus Derechos Conforme al Título VI

MAX opera sin distinción de raza, color, u origen nacional. Para pedir información adicional sobre las obligaciones de MAX en cuanto al Título VI, favor de comunicarse con el funcionario del Título VI al 616.928.2494.

Se puede obtener un formulario de queja de Título VI en el sitio web de MAX, www.catchamax.org, llamando al 616.928.2494, o por correo:

Title VI Staff Officer
Macatawa Area Express
171 Lincoln Ave.
Holland MI 49423




APPENDIX E

TITLE VI TRANSIT-RELATED INVESTIGATIONS, LAWSUITS, AND COMPLAINTS

RECORD OF TITLE VI-RELATED INVESTIGATIONS, LAWSUITS, & COMPLAINTS					
INVESTIGATIONS					
DATE	PROTECTED CLASS	SUMMARY	STATUS (OPEN/CLOSED)	ACTION(S) TAKEN	
1.	None.				
LAWSUITS					
DATE	PROTECTED CLASS	SUMMARY	STATUS (OPEN/CLOSED)	ACTION(S) TAKEN	
1.	10/28/2019	Race	Allegation by customer that he was unlawfully removed from the bus for one day due to race.	CLOSED (OCT. 2021)	None; Dismissed by Court.
2.					
3.					
COMPLAINTS					
DATE	PROTECTED CLASS	SUMMARY	STATUS (OPEN/CLOSED)	ACTION(S) TAKEN	
1.	None.				

APPENDIX F

AUTHORITY BOARD REVIEW & APPROVAL OF TITLE VI PROGRAM

The Authority Board was provided a complete copy of the Title VI Program one week prior to the meeting and was presented background information on the primary areas of the Title VI Program and Limited English Proficiency (LEP) Policy, on Monday, July 24, 2023, with formal Approval additionally granted on Monday, July 24, 2023.



**Macatawa Area Express Transportation Authority
Meeting Minutes
Monday, July 24, 2023
Approved Minutes**

The Macatawa Area Express Transportation Authority Board met at 3:30 pm in the training room at the MAX Operations building - 11660 Greenway Drive, Holland, MI 49424.

Members Present: Chair Russ TeSlaa and Vice-Chair Lyn Raymond, and Secretary/Treasurer Joe Baumann; Board Members Meika Weiss, Kristin Myers, Jason Latham, Jan Steggerda, and Kevin Klynstra

Others Present: N/A

Members Absent: Board Members Al Rios, and Abraham Hernandez

Staff Present: Elisa Hoekwater, Beth Higgs, Charlie Veldhoff, Lynn McCammon, Kaitlynn Riegling, Sandra Korhorn, and Barbara Sonnerville

7.23.1 Approval of the June 12, 2023 Board Meeting Minutes
A motion was made by Myers and supported by Latham to approve the June 12, 2023 board meeting minutes. Motion carried unanimously.

7.23.2 Public Comment
There were no public comments.

7.23.3 Marketing Committee
Higgs reported that the MAX Employee Appreciation week is July 24th through July 28th. The week will be filled with exciting Vegas themed games and prizes and a Breakfast Cookoff on Friday, culminating with a Casino Luncheon at Conner Bayou, on Sunday, July 30th, that includes great food, Vegas themed games and exciting prizes.

7.23.4a Call Center Summary
There was no discussion.

APPENDIX F

**AUTHORITY BOARD REVIEW & APPROVAL OF TITLE VI PROGRAM
(CONTINUED)**

- 7.23.4f *Revisions to MAX Drug-Free Workplace Policy*
In February 2023, MAX staff responded to FTA Recipient Information Request (RIR) packet requiring information and documents for fiscal years 2019-2022 to prepare for the July 2023 Triennial Review. On July 11, MAX received a request for additional documents and information, which included one element of the current Drug-Free Workplace Policy. The revision presented to the board satisfied the requirement. A motion was made by Latham and supported by Myers approve the policy revision as written. Motion carried unanimously.
- 7.23.4g *Memorandum of Understanding Between MAX and Macatawa Area Coordinating Council*
An updated version of the memorandum of understanding between the Macatawa Area Express Transportation Authority and the Macatawa Area Coordinating Council was presented for review and approval. No changes to the agreement were made, only a currently dated document was needed. A motion was made by Baumann and supported by Weiss approve the updated memorandum of understanding between the two agencies as written. Motion carried unanimously.
- 7.23.4h *FY2024-2026 Title VI Program*
Every three years, MAX must submit to the Federal Transit Administration (FTA) a copy of its updated Title VI program. The updated policy, if approved, will be submitted well ahead of MAX's date to FTA of October 1, 2023. A motion was made by Latham and supported by Baumann approve the submission of the MAX Title VI Program as written. Motion carried unanimously.
- 7.23.4i *Triennial Review July 2023*
The Federal Transit Administration (FTA) provides financial and technical assistance to public transit systems across the U.S. To ensure agencies follow FTA rules and guidelines for continued funding, a review of twenty-two areas across the organization is conducted every three years. Due to the COVID pandemic in 2020, FTA suspended reviews, so this Triennial Review will cover a period of four years. In February 2023, MAX staff responded to FTA Recipient Information Request (RIR) packet requiring information and documents for fiscal years 2019-2022 to prepare for the July 2023 Triennial Review. On July 11, MAX received a request for additional documents and information, which MAX provided. The official review dates were July 25-July 27. On Monday, July 30th, MAX will receive a summary of review to include any corrective action requests for deficiencies found in policies, processes, or procedures. MAX will have five days to respond, and FTA will then decide if the deficiencies will remain in place or removed. The final phase of the Triennial Review is the "Exit Conference" scheduled for August 10, 2023.
- 7.23.4j *Transit Asset Management (TAM) Plan Performance Targets*
Veldhoff presented the Transit Asset Management Plan for the FY24 Annual Performance Targets. For planning purposes, the Annual Performance Targets are formally approved by the Executive Director and are shared annually with MDOT and the Holland-area MPO, the Macatawa Area Coordinating Council (MACC). These goals were provided to the board for informational purposes only.

APPENDIX G

ENVIRONMENTAL JUSTICE PROGRAM NOTICE
TRANSPORTATION EQUITY & ENVIRONMENTAL JUSTICE

Whereby Title VI prohibits discrimination by recipients of Federal financial assistance on the basis of race, color, and national origin—including matters related to language access for limited English proficient (LEP) persons—Environmental Justice ensures the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.

Executive Order 12898 on Environmental Justice directs federal agencies to “make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.”

Transit equity concerns may arise when wealthier, more educated parts of society receive more transportation benefits while minority or low-income populations receive less transportation or experience more negative effects of transportation activities. For example, these neighborhoods may have more air pollution and noise as a result of transportation activities, and may experience loss of homes or cultural landmarks, or receive little or no relief measures. They may also not receive employment or business opportunities because of a transportation construction project.

GUIDING PRINCIPLES

The U.S. Dept. of Transportation has adopted three fundamental environmental justice principles to guide transportation efforts:

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

A COMMITMENT TO LOW-INCOME COMMUNITIES & COMMUNITIES OF COLOR

The Macatawa Area Express (MAX) will comply with this requirement, and has made environmental justice part of its overall mission. MAX is committed to providing high-quality service to low-income communities and communities of color by using transit equity and environmental justice considerations in its planning and decision-making, including such areas as:

- transit service to minority and low-income neighborhoods
- service cuts, policy changes, or restructuring—including the increase of fares
- placement of bus stops, passenger waiting shelters, or related enhancements or amenities
- allocation of new transit vehicles, or construction of new facilities or stations
- service for non-English speaking populations

Additional information can be found in the Environmental Justice section of the MAX Title VI Policy: ***TITLE VI PROGRAMS & PROCEDURES***

APPENDIX H

**TITLE VI EQUITY ANALYSIS & ENVIRONMENTAL JUSTICE REVIEW
CONSTRUCTION OF NEW BUS STORAGE & MAINTENANCE FACILITY (2012)**

Address: 11660 Greenway Drive, Holland, Michigan

Parcel ID Number: 70-16-22-100-076

Est. Project Completion: Fall 2013

The selection and acquisition of property needed for the construction of the Macatawa Area Express Transportation Authority's Bus Storage & Maintenance Facility involved careful documentation preparation, planning, and decision-making to ensure proper analysis were conducted with respect to Federal Transit Equity & Environmental Justice principles.

Initially, multiple industrial-zoned siting alternatives were considered, with selection of the Greenway property resulting from its proximity to major thoroughfares, and its centralized location within the service area and potential future service area. Reconstruction of the present site—along with acquisition of an existing City of Holland building—was additionally explored but ruled out due to higher expected overall costs and limited expansion potential. Although none would be displaced, an area of low-income housing with some minority representation exists adjacent to that site, creating the potential for unfavorable community impact.

Preparation of materials required in submission for request for **Categorical Exclusion** identify the proposed site located within an established industrial park, itself surrounded by existing commercial and (additional) industrial properties. Wide access streets link the industrial park directly to major thoroughfares, without passing through any residential communities. Careful review of multiple records and visits to the site revealed no existing structures or wetland areas, and no evidence of structural or historical significance present or evident in record.

IN SUMMARY, NO DISRUPTIONS OR DISPARATE IMPACTS ON THE ENVIRONMENT OR HUMAN POPULATIONS WERE IDENTIFIED IN THE ACQUISITION, CONSTRUCTION, OR FINAL USE PHASES OF THE NEW FACILITY. The complete, detailed application materials and records submitted are archived in the document: *FEDERAL TRANSIT ADMINISTRATION, REGION V, INFORMATION REQUIRED FOR PROBABLE CATEGORICAL EXCLUSION (23 CFR SECTION 771.117(d))*.

A **CATEGORICAL EXCLUSION WAS GRANTED** dated June 15, 2011 by FTA Region V in accordance with 23 C.F.R. Part 771-117(d)(8) and supported concurrently by the Phase I Environmental Site Assessment prepared by DLZ Michigan, Inc., 1425 Keystone Avenue, Lansing, Michigan, dated January 2011. All documents and reports stated in the above paragraphs are archived and available for review upon request.

Prepared by: Charles Veldhoff, Transit Planner
Macatawa Area Express Transportation Authority
Date: July 23, 2012
*Updated: December 5, 2012**

**As of the construction bid award, final available funding does not exist for construction of the maintenance portion, though the design work has been completed for use with future, available funding. The project is identified and referred to as "New Operations Building."*

APPENDIX I

POLICY FOR PUBLIC COMMENT ON FARE & SERVICE CHANGES

MACATAWA AREA EXPRESS TRANSPORTATION AUTHORITY
POLICY FOR PUBLIC COMMENT ON FARE & SERVICE CHANGES

February 7, 2007

Revised: 04/26/2016, 01/03/2019, 09/08/2020

The Macatawa Area Express (MAX) Transportation Authority will consider public comments before raising a fare or carrying out a major reduction in transit services. The purpose of these procedures is to ensure adequate, reasonable opportunity for public feedback with regard to proposed changes.

A major reduction in transit services has been defined by MAX as a service change that will result in at least 10% of the past year's total ridership no longer having access to public transportation in the service area.

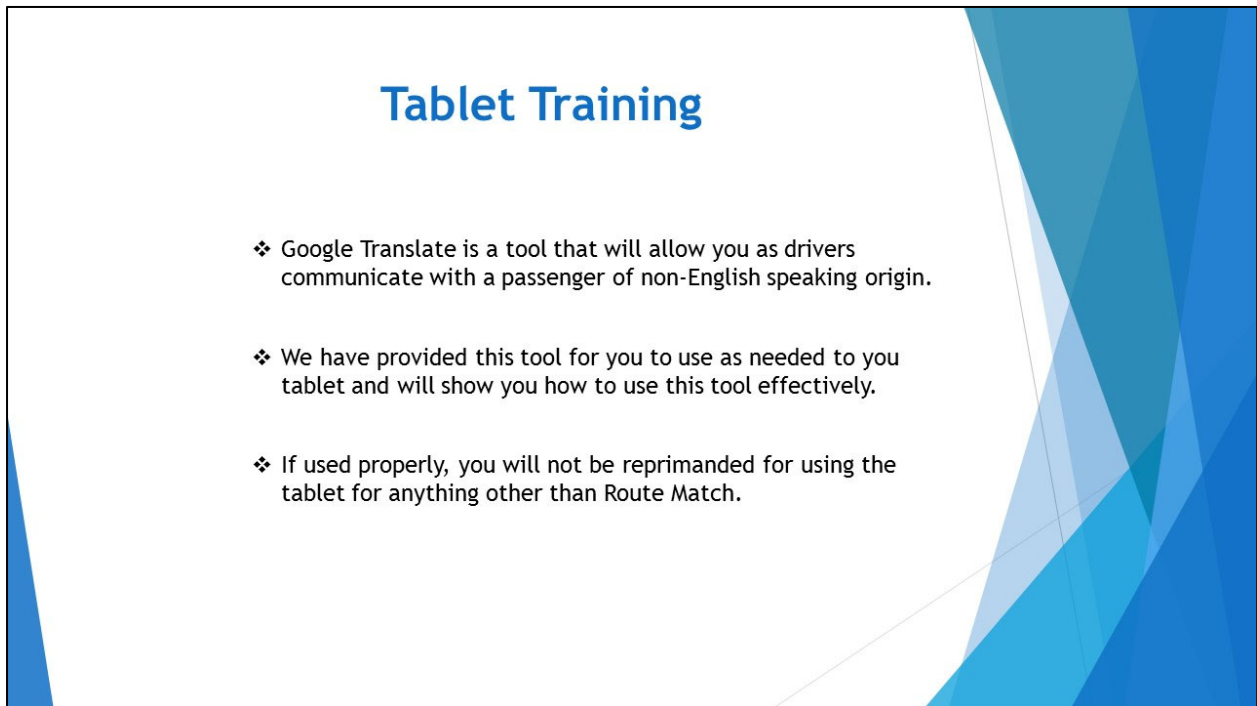
MAX will assess and document its efforts at identifying, avoiding, minimizing, and/or mitigating potential *disparate impacts* based on race, color, or national origin populations, and/or potential *disproportionate burdens* based on low-income, non-minority populations.

The process for receiving public comment on fare increases or major reductions in transit service are as follows:

1. At least thirty (30) days in advance of the public hearing, **public notice** of the proposed fare increase or major reduction of transit service will be distributed to the community and/or posted as follows:
 - to local media and newspapers, in the form of press releases
 - on the MAX website (www.catchamax.org)
 - on all transit buses
 - through all social media outlets
2. Public notices shall contain the following information:
 - a description of the proposed change in sufficient detail, including—if applicable—the area(s) and route(s) to be affected
 - the proposed effective date of the change(s)
 - points-of-contact for asking questions or registering comments: MAX's main telephone line, MAX's website, revenue-vehicle comment cards, written letters to the board, or in person during public hearings
 - the date, time, and location(s) of the planned public hearing
3. MAX will hold a minimum of one (1) public hearing on the proposed fare increase or major reduction in service. The public meeting may be held in connection with the Authority Board's regular monthly meeting, and will appear on the Authority Board agenda.
4. The Authority Board will consider all public comments before making a final decision.
5. The Authority Board's decision will be final, and shall be posted on the MAX website.

APPENDIX J

GOOGLE TRANSLATE INSTRUCTIONS (ONBOARD TABLETS)




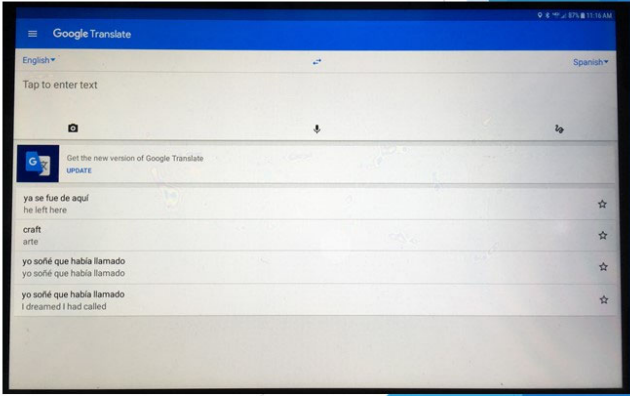
APPENDIX J (CONTINUED)

Tablet Training

Google Translate: Step by Step

Step 1:
Power on tablet

Step 2:
Load Google Translate
- Look for this APP



Tablet Training

Google Translate: Step by Step


Step 3:
Load Google Route Match
- Look for this APP
- Log into Route Match

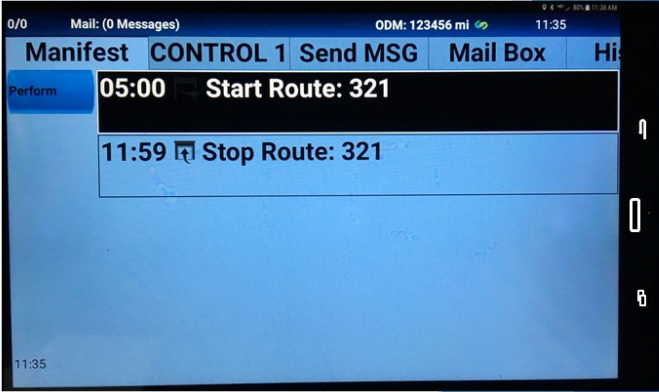


APPENDIX J (CONTINUED)

Tablet Training

Route Match to Google Translate
Steps

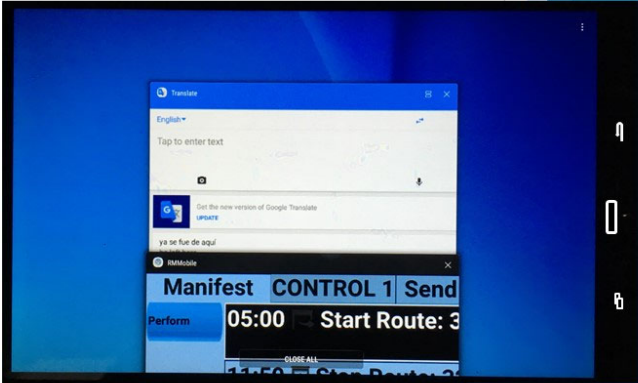
Step 1: Push and Hold  Button



Tablet Training

Route Match to Google Translate
Steps

Step 2: Tap on Translate to make it Primary APP

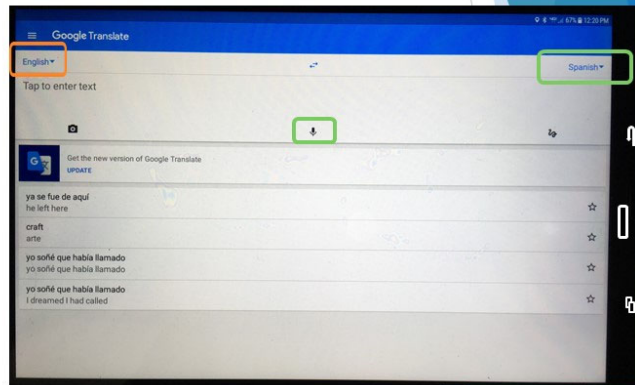


APPENDIX J (CONTINUED)

Tablet Training


Google Translate Steps

Step 3: From here you can choose language, and Type or Speak Question or Direction to be translated.



Tablet Training

Google Translate Back to Route Match Steps

Step 4: Push and Hold  Button

Step 5: Tap on Route Match to make it Primary APP

