

City of Wilsonville

South Metro Area Regional Transit (SMART)

Title VI Program

August 2026

Transit Director Dwight Brashear

(503) 682 – 7790

29799 SW Town Center Loop East

Wilsonville, Oregon 97070

Recipient ID 5706

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Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in any program or activity that receives federal financial assistance. This law is applicable to a wide range of federally funded programs, including transportation services. The Federal Transit Administration (FTA) is responsible for enforcing Title VI regulations and investigating any complaints of discrimination. As a recipient of federal funds, the City of Wilsonville is committed to complying with Title VI regulations and ensuring that its transit services are accessible to all members of the community. To demonstrate its commitment, the City has developed a comprehensive program outlining its efforts to provide equitable access to transit services.

Title VI also mandates recipients of federal funds to offer language assistance services to those with Limited English Proficiency (LEP). This requirement extends to transportation services, necessitating that transit agencies offer interpretation and translation services and translated materials. The City of Wilsonville has developed a Language Assistance Plan to comply with Title VI regulations, promoting equity and inclusivity in its transit services.

This program plan reflects the City's commitment to non-discrimination and its dedication to providing safe and accessible transit services to all individuals, regardless of their race, color, or national origin.

Signed Policy Statement

A policy statement signed by Jeanna Troha, Wilsonville City Manager, assuring SMART's compliance with Title VI of the Civil Rights Act of 1964, can be found as Attachment A.

Notification to the Public of SMART's Title VI obligations

Wilsonville SMART publicizes its Title VI program by posting its commitment to providing services without regard to race, color, or national origin in all buses, at City Hall, Wilsonville Transit Center, and at the SMART administration and maintenance facilities. This notice is included as Attachment B.

Furthermore, SMART provides information regarding Title VI obligations on its website.

<https://www.ridesmart.com/transit/page/let-us-know>

The posters and website provide information:

- A statement that the City operates programs without regard to race, color, and national origin; and
- A statement encouraging anyone to contact the City of Wilsonville with questions or comments about SMART's non-discrimination policies or to file a complaint.
- Contact information to provide this information in Spanish

Title VI Complaint Procedures

The City of Wilsonville has a standard process for investigating all complaints filed with SMART. Members of the public may file a signed, written complaint up to one hundred and eighty (180) days from the date of the alleged discrimination. Full procedures for filing a complaint and the City procedures for investigating complaints can be found as Attachment C. The complaint form itself is Attachment D. At a minimum, the complaint should include the following information:

- Name, mailing address, and how to contact complainant (i.e., telephone number, email address, etc.)
- How, when, where and why complainant alleges they were discriminated against. Include the location, names and contact information of any witnesses.
- Other significant information.

The complaint may be filed in writing with the City of Wilsonville at the following address:

Dwight Brashear
Transit Director
29799 SW Town Center Loop E
Wilsonville, Oregon 97070

Record of Title VI investigations, complaints, or lawsuits

SMART has had no Title VI complaints, investigations, or lawsuits filed against it in the past three years.

Public Participation Plan

The City of Wilsonville developed a Framework for Inclusive Engagement (Attachment E) to guide its outreach and involvement efforts across various projects goal of promoting diversity, equity, and inclusion and encouraging participation by all members of the community. The framework includes a six-step process for public decision-making, which aims to engage stakeholders early and throughout a decision-making process, building trust and confidence in the process. The six-step process for public decision-making is as follows:

- Step 1.** Define the problem and identify desired outcome for a planning project
- Step 2.** Determine criteria and measures for the desired outcomes
- Step 3.** Brainstorm alternative solutions to the problem
- Step 4.** Evaluate the alternatives using the agreed upon criteria
- Step 5.** Consider tradeoffs between alternatives
- Step 6.** Develop recommendations to the decision makers

The framework also emphasizes the importance of engaging historically underrepresented

stakeholders to ensure inclusive decision-making and provides potential actions for overcoming barriers to engagement. It also describes the importance of investing resources into meaningful engagement by identifying key audiences, relevant strategies for public outreach and engagement (i.e., public meetings, workshops, focus groups, open houses, social and community events, etc.), and measuring the success of these efforts to produce effective community outcomes.

Summary of Public Participation Efforts

Over the last three-year period (fall 2023 through summer 2026), SMART conducted the following public outreach and involvement activities:

Community Engagement and Public Input

- Surveys at community events and onboard buses, in English and Spanish, gathered input on proposed projects and service improvements
- Facebook and Instagram posts in English and Spanish promoted SMART events and services
- Articles in the *Boones Ferry Messenger* (City newsletter) about service changes implementing the 2023 Transit Master Plan

School and Active Transportation Outreach

- Walk SMART program (2023, 2024, and 2026)
- Back-to-school outreach promoted transit and active transportation options at various school locations (2023–2026)
- Bike Rodeo materials provided in English and Spanish (2023–2026)
- Community Bike Ride materials provided in English and Spanish (2025 and 2026)
- Walk + Roll to School Day event materials provided in English and Spanish throughout the 2023–2026 school years
- Autumn Park (affordable housing development) Walking School Bus materials provided in English and Spanish throughout the 2023–2026 school years
- Lowrie Bike Bus materials in English and Spanish (2025-2026 school year)

In-Person Tabling and Community Events

SMART staff participated in the following events to inform and engage community members about transit services:

- Wilsonville Farmers Market (Summer 2024–2026)
- Rotary Concerts in the Park (Summer 2023, 2025, and 2026)
- Wilsonville Schools back-to-school nights (2023–2026)
- Bridging Cultures events in Canby (twice each summer, 2024–2026)
- Thursday Fun Shows at the public library (Summer 2026)
- Juneteenth Community Event June (2024-2026)

- Pride Party Event (June 2025-2026)
- Transit Tuesday during Transit Month (June 2025-2026)
- Tune-up Tuesdays (July 7, 14, 21, and 28, 2026)
- WLWV Family Empowerment Open House (August 2024–2025)
- City of Wilsonville Party in the Park (August 2023–2026)
- Heart of the City Gear Up 4 School event (August 2023, 2024, and 2026)
- Party in the Park (August 2024-2026)
- Fall Fest (October 18, 2025)
- Be Seen Be SMART (visibility/safety lights) events November (2023-2025)

Ongoing Outreach and Accessibility Efforts

- The SMART website includes Google Translate, which can translate website content into more than 80 languages
- Phone callers can access a third-party translation service upon request
- SMART participated in the Get There Oregon Transportation Choices Program (2023–2026), including monthly email outreach to employer transportation coordinators and related Facebook and Instagram posts
- Annual onboard rider surveys, conducted in English and Spanish, collected demographic and customer satisfaction data (Fall 2023-2025)
- DEQ Employee Commute Options (ECO) Rule outreach and survey materials provided to large Wilsonville employers (ongoing, 2023–2026)
- Senior and Community Center outreach workshops held on an ongoing basis
- Travel training provided from 2023 to 2026
- Wilsonville schools outreach- parents, teachers, staff (ongoing)

SMART Limited English Proficiency Outreach Plan

A full copy of SMART’s outreach plan for individuals with limited English proficiency can be found in Attachment F. Key elements of the plan include:

- Spanish speaking translators available upon request
- Route and schedule information available in English and Spanish
- Transit surveys conducted by SMART available in Spanish
- Public meetings with translators available upon request
- Multiple-language translators are available by contacting SMART by phone
- Rider alerts and other notifications printed in both Spanish and English
- Information on SMART’s website automatically translated into multiple languages

Title VI – Compliance Officer & Limited English Proficiency Plan (LEP) Coordinator

SMART's Transit Director, who reports to the Wilsonville City Manager, will serve as the overall Title VI Compliance Officer. The Compliance Officer is responsible for ensuring that SMART is meeting its obligations under Title VI of the Civil Rights Act of 1964.

SMART's Grants & Programs Manager will serve as SMART's Title VI Limited English Proficiency (LEP) Plan Coordinator. The LEP Plan Coordinator will ensure that SMART satisfies the intent of the LEP Plan by making information available to LEP individuals, offering ways for them to participate in SMART's public participation efforts and ensuring the process is in place for direct input and feedback.

Membership by Race on Planning or Advisory Boards

SMART has no planning or advisory boards at this time.

Subrecipients

SMART has no subrecipients.

Facilities Siting and Construction

SMART has not sited, located or constructed any facility requiring an equity analysis since the last Title VI program was approved. A new customer service office was sited at the existing Wilsonville Transit Center. Minor sidewalk improvements were made at multiple locations to improve ADA access, but the locations were selected solely based on the physical characteristics of the existing sidewalks.

Overview of SMART Service Standards and Policies

The Wilsonville City Manager adopted the updated SMART Service Standards and Policies document on August 12, 2026. This is included as Attachment G.

Attachment A – Non-Discrimination Policy Statement



**City of Wilsonville
South Metro Area Regional Transit
Non-Discrimination Policy Statement**

August 12, 2026

Title VI of the Civil Rights Act of 1964 states:

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

The City of Wilsonville is committed to complying with the requirements of Title VI in all of its programs and activities, including the provision of transit services.

A handwritten signature in cursive script that reads "Jeanna Troha".

Jeanna Troha
City Manager
City of Wilsonville, including South Metro Area Regional Transit

Phone 503-570-1504
Fax 503-682-1015

CITY OF WILSONVILLE
29799 SW Town Center Loop East
Wilsonville, OR 97070

www.ci.wilsonville.or.us
cosgrove@ci.wilsonville.or.us

Attachment B – Title VI Notice



Non-Discrimination and Public Rights under Title VI

The City of Wilsonville's South Metro Area Regional Transit (SMART) is committed to ensuring that no person shall, on the grounds of race, color, national origin, gender, disability, or sexual orientation be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity in accordance with Title VI of the Civil Rights Act of 1964 and the City of Wilsonville's non-discrimination policy.

If you have any questions or concerns about Title VI compliance or the City's non-discrimination policy, or if you wish to file a complaint, please contact:

Dwight Brashear, Transit Director
29799 SW Town Center Loop E.
Wilsonville, OR 97070
brashear@ridesmart.com
503-570-1576

A complainant may file a complaint directly with the Federal Transit Administration:

Webform: <https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/file-complaint-fta>
Email: FTACivilRightsCommunications@dot.gov

For questions about how to prepare a federal complaint, please contact the toll-free civil rights hotline at (888) 446-4511.

If information is needed in another language, please contact 503-682-7790.
Si se necesita información en otro idioma, llame al 503-682-7790.

Attachment C – Discrimination Complaint Procedure

1. Title VI of the Civil Rights Act of 1964 states that no person in the United States shall, on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. Any person who believes that he or she, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, may file a complaint with the City of Wilsonville South Metro Area Regional Transit (SMART). A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to the City of Wilsonville Transit Director for review and action.
2. To have the complaint considered under this procedure, the complainant must file the complaint no later than 180 days after:
 - a) The date of alleged act of discrimination; or
 - b) Where the alleged conduct occurred over an ongoing period, the date on which the conduct was discontinued.

In either case, SMART may extend the time for filing or waive the time limit in the interest of justice, as long SMART specifies in writing the reason for so doing.

3. Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints shall set forth as fully as possible the facts and circumstances surrounding the alleged discrimination. If a person makes a verbal complaint of discrimination to an officer or employee of SMART, the person shall be interviewed by the City of Wilsonville Transit Director. If necessary, the City's Transit Director will assist the person in reducing the complaint to writing and submit the written version of the complaint to the person for signature. The complaint shall then be handled according to the City of Wilsonville's investigative procedures.
4. Within 10 days, the City's Transit Director will acknowledge receipt of the allegation, inform the complainant of action taken or proposed action to process the allegation, and advise the complainant of other avenues of redress available, such as ODOT and USDOT.
5. The recipient will advise ODOT and/or USDOT within 10 days of receipt of the allegations. Generally, the following information will be included in every notification to ODOT and/or USDOT:
 - a) Name, address, and phone number of the complainant.
 - b) Name(s) and address(es) of alleged discriminating official(s).
 - c) Basis of complaint (i.e., race, color, or national origin)
 - d) Date of alleged discriminatory act(s).
 - e) Date of complaint received by the recipient.
 - f) A statement of the complaint.

- g) Other agencies (state, local or Federal) where the complaint has been filed.
 - h) An explanation of the actions the City of Wilsonville has taken proposed to resolve the issue in the complaint.
6. Within 60 days, the City's Transit Director will investigate the allegation and based on the information obtained, will render a recommendation for action in a report of findings to the Wilsonville City Manager. The complaint will be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report of findings.
 7. Within 90 days of receipt of the complaint, the City's Transit Director will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights with ODOT, or USDOT, if they are dissatisfied with the final decision rendered by SMART. The City's Transit Director will also provide ODOT and/or USDOT with a copy of this decision and summary of findings upon completion of the investigation.
 8. Contacts for the Federal Title VI administrative process are as follows:

[Federal Transit Administration Online Civil Rights Complaint Form](#)

(<https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/file-complaint-fta>)

For questions about how to prepare a complaint, the toll-free civil rights hotline is (888) 446-4511.

Attachment D – Title VI Complaint Form

COMMENT FORM

SMART is committed to providing you with safe and reliable transportation services and we want your feedback. Please use this form for suggestions, compliments, and complaints. You may also call us at (503) 682-7790 or contact us by email at smart@ridesmart.com or U.S. postal mail to SMART Customer Service, 29799 SW Town Center Loop E, Wilsonville, OR 97070. Please make sure to provide us with your contact information in order to receive a response.

SECTION I: TYPE OF COMMENT (Choose One)					
Compliment ☐	Suggestion ☐	If reporting discrimination, it is based on:	Race, color, or national origin (Title VI) ☐		
Complaint ☐	Other ☐		Disability (ADA) ☐	Other ☐	
SECTION II: CONTACT INFORMATION					
Name:					
Street Address:					
City, State, Zip code:					
Phone:		Email:			
Accessible Format Requirements:		Large print ☐	TDD/Relay ☐	Audio Recording ☐	Other ☐
SECTION III: COMMENT DETAILS					
Transit Service (Choose One):		Fixed Route ☐		Dial-a-Ride ☐	
Date of Occurrence:			Time of Occurrence:		
Name/ID of Employee(s) or Others Involved:					
Vehicle ID/Route Name or Number:					
Direction of Travel:					
Location of Incident:					
Mobility Aid Used (if any):					
If above information is unknown, please provide other descriptive information to help identify the employee:					
Description of Incident or Message:					
SECTION IV: FOLLOW UP					
May we contact you if we need more details or information?			Yes ☐	No ☐	
What is the best way to reach you? (Choose One)		Phone ☐	Email ☐	Mail ☐	
If a phone call is preferred, what is the best day and time to reach you?					
SECTION V: RESPONSE (SMART STAFF COMPLETE)					
Email response ☐	Telephone response ☐	Response by U.S. Postal Mail ☐		Date:	



FORMULARIO DE COMENTARIOS

SMART se compromete a brindarle servicios de transporte seguros y confiables y queremos sus comentarios. Por favor utilice este formulario para sugerencias, elogios y quejas. También puede llamarnos al (503) 682-7790 o contactarnos por correo electrónico a smart@ridesmart.com o por correo postal a SMART Customer Service, 29799 SW Town Center Loop E, Wilsonville, OR 97070. Asegúrese de proporcionarnos con su información de contacto para poder recibir una respuesta.

SECCIÓN I: TIPO DE COMENTARIO (Elija uno)				
Elogio ☐	Sugerencia ☐	Si se denuncia discriminación, se basa en:	Raza, color u origen nacional (Título VI) ☐	
Queja ☐	Otro ☐		Discapacidad (ADA) ☐	Otro ☐
SECCIÓN II: INFORMACIÓN DE CONTACTO				
Nombre:				
Dirección:				
Ciudad, Estado, Código Postal:				
Teléfono:		Correo electrónico:		
Requisitos de Formato Accesible:	Letra grande ☐	TDD/ Relé ☐	Grabación de Audio ☐	Otro ☐
SECCIÓN III: DETALLES DEL COMENTARIO				
Servicio de Tránsito (Elija Uno):	Ruta Fija ☐	Dial-a-Ride ☐		
Fecha de Ocurrencia:		Hora de Ocurrencia:		
Nombre/ID del Empleado(s) u Otras Personas Involucradas:				
ID del Vehículo/Nombre o Número de Ruta:				
Dirección de Viaje:				
Lugar del Incidente:				
Ayuda de movilidad utilizada (si corresponde):				
Si desconoce la información anterior, proporcione otra información descriptiva para ayudar a identificar al empleado:				
Descripción del Incidente o Mensaje:				
SECCIÓN IV: SEGUIMIENTO				
¿Podemos comunicarnos con usted si necesitamos más detalles o información?			Sí ☐	No ☐
¿Cuál es la mejor manera de llegar a usted? (Elija uno)		Teléfono ☐	Correo electrónico ☐	Correo ☐
Si prefiere una llamada telefónica, ¿cuál es el mejor día y hora para comunicarnos con usted?				
SECCIÓN V: RESPUESTA (SMART)				
Correo electrónico ☐	Teléfono ☐		Correo ☐	

Attachment E – Public Engagement Plan Framework

Wilsonville Framework for Inclusive Engagement

June 23, 2022

Purpose

The City of Wilsonville is committed to engaging residents, businesses, property owners, and other stakeholders in planning and decision making that impacts them. This includes planning, policy, and project decisions related to land use, housing, parks and recreation, transportation, and other community issues. The City is also committed to increasing and supporting the involvement of historically underrepresented community members through consistent, fair, and accessible public engagement activities that encourage participation by all members of the community.

This framework was developed to provide a foundation on which City outreach and involvement efforts can be based across a variety of projects to substantially increase diversity, equity, and inclusion in decisions by bringing meaningful engagement to all members of the community. The approach outlined here brings the community into the process early and is designed to engage them collaboratively to define the issues to be addressed and to develop potential solutions and recommendations. Inclusive engagement is fundamentally different from traditional public outreach as it engages interested parties directly in the decision-making process, rather than asking for feedback on decisions the City is making or has already made.

Inclusive engagement brings in community members with a broad range of perspectives, experiences, needs and preferences to be active participants at each step of decision making, from defining the problem or issues, to defining a successful outcome, generating and evaluating potential solutions, and advancing recommendations. It encourages all members of the community to work with the City to develop plans, projects, policies and other actions that represent the diversity of interests and needs in Wilsonville.

Benefits of Engaging the Public

Broad community involvement in City decisions provides a number of significant benefits:

Legitimacy and increased support for plans and projects. With the substantive engagement of affected communities, developed actions will reflect legitimacy, community support, and equitable outcomes. Legitimacy builds trust, political will, and ownership for effective implementation.

Improved community/government relations. Community engagement can build trust between diverse stakeholders and help improve the quality of difficult discussions about racial disparities, economic conditions, and community development needs. By creating a multifaceted process built upon relationship building, trust, respect, and affirmation of community knowledge and power, more effective ways of dealing with differences will emerge.

Deeper understanding of the issues. City initiatives will be stronger with the input of the people potentially affected by the decisions and actions. Plans, projects, policies and initiatives will benefit by significant engagement of residents and organizations that have knowledge of the existing

challenges and opportunities, and experience to create solutions to these challenges.

Increase in community capacity. A meaningful engagement strategy will improve the capacity for problem solving. Engagement builds stronger networks across racial, ethnic, generational, gender, and socioeconomic divides, an essential component to achieving equitable outcomes and leveraging additional resources.

Reduced long-term costs. Plans, projects and policies that are supported by the community can generally be funded and implemented faster than those that experience resistance. Additional costs associated with redesign, extended negotiations, or even litigation can result from lack of community consensus. While conflicts may arise during planning (especially when there is a history of failed projects or unrealized promises), the community engagement process creates an environment of positive communication where creative and inclusive solutions can be found to resolve conflicts.

Democracy in action. Community engagement is, in many ways, a microcosm of our American democratic system of government. It is one of the best ways community residents can connect to and shape local and regional decision-making processes.

Principles for Effective Outreach

Community engagement should take a comprehensive approach, creating practices and institutionalized mechanisms that share power and vest decision-making control in all members of the community, including historically overlooked and marginalized groups and individuals. When utilized for the purpose of increasing community power and agency for problem solving, community engagement is guided by a few key principles:

Honor the wisdom, voice, and experience of the community

Involve diverse and representative community interests

Treat participants with integrity and respect

Be transparent about the process, motives and power dynamics

Share decision making and initiative leadership

Engage in continuous reflection and willingness to change course

Transformative engagement can be the difference between a successful initiative and one that falls well short of its potential. It enables highly technical or routine projects and processes to produce real, tangible and lasting benefits for communities. To be transformative and achieve the City's objective of being inclusive, engagement should be:

Collaborative – work together with the community to generate ideas and develop solutions

Outcome-driven – focus on solving a problem

Inclusive – involve stakeholders in defining the problem, the desired outcome, and the process for decision making

Fair – clearly define decision-making process

Trackable – document all input and decisions

Accessible – make meetings and information accessible for all

How to Use the Framework

The framework provided here offers general guidance for effective public decision making and engagement. It includes a six-step process that guides the focus of public engagement at each step of the process. It is intended to be a flexible, principle-driven process that can be easily followed by the City and the public to track the decisions and focus of each step, creating a fair and transparent process. This requires documentation of all input and decisions at each step of the process to allow the community to track how their perspectives are considered and addressed. The framework can be used as the foundation for designing public outreach for all City activities that include a public outreach or engagement component. The process is flexible and adaptable to the complexity and timeframes of different types of policy, planning, and project initiatives.

Questions to Consider

In applying the framework to your public initiative, it may be helpful to consider the following questions to set the context for the public outreach design:

What would a successful public engagement effort look like for this initiative?

Is the City starting from a relatively blank slate to understand the full set of needs or is it focused on specific solutions or constraints?

What is the timeline and decision-making structure that will drive the process?

What is your understanding of the community landscape? Who is affected? Which community groups or other stakeholders can help engage the most affected community members? Consider individuals and groups that have been historically underrepresented in community engagement.

What are the core questions and tradeoffs associated with the project? What are the most important questions and tradeoffs stakeholders and decision makers must consider? Are there segments of the community that will be particularly interested in those questions?

Designing the Process

Establish Goals for Community Engagement

It is important to be clear about why you are doing public engagement to ensure that the public outreach effort is designed to meet your intended outcome. The purpose can range from providing information to the public, to obtaining input on a project or decision, to involving the community in decisions. It is always better to look to a more inclusive approach if you are unsure how much interest or controversy there is around a decision. Starting with more outreach and then backing off if the level of interest is not there is better than starting with an information campaign and being met with community resistance or controversy; such an approach does not engender trust in the process.

Establishing goals for engagement is not focused on a solution, it is focused on what the public process brings to developing a solution. The goal of community engagement is to provide opportunities for the public to gain information, provide input, and influence the outcome at whatever

level necessary to support the final recommendation. Understanding the nature of the decisions being made, the opportunities to enhance decisions through community dialogue, and awareness of the challenges and community concerns is essential to designing an effective engagement process.

Framework for Engagement

The framework outlined below is easily adapted to a wide variety of applications to provide a structure to public engagement on a City-wide basis. Consistency in the approach allows the community to recognize the steps of the process and how their participation will be used in the City's decision making. This builds trust and confidence in the process and encourages broad public involvement.

Key Steps, Strategies, and Considerations

The steps outlined here are general in nature and can be adapted to meet the complexity and context of any decision. They are designed to make the process transparent and understandable to all interested parties, focus on developing a fair process that reflects community values from a broad range of interests, facilitate creative problem solving, and engage the community in weighing tradeoffs and values.

The framework for engaging the community in a fair and transparent decision-making process is developed around the six steps for public decision making, shown in *Table 1*.

Table 1: Steps for Public Decision Making

Step 1	Define the problem and identify desired outcome for the project or initiative
Step 2	Determine criteria and measures for the desired outcomes
Step 3	Brainstorm potential solutions to the problem
Step 4	Evaluate the alternatives using the agreed upon criteria
Step 5	Consider tradeoffs among alternatives
Step 6	Develop recommendations to the decision makers

The framework is designed to engage stakeholders early and allow them to participate throughout the process. It is built on a proactive approach that involves the community as active partners, rather than simply being asked to react to City-generated solutions. It is important to document and report back to the community the perspectives, ideas, and input they bring at each step of the process, and to show how these are used to define the problem, develop the evaluation criteria, generate ideas or solutions, evaluate potential solutions, and develop recommendations.

Step 1: Define the problem and identify desired outcome for the project or initiative

The first step of any process is to define the problem to be addressed. For most planning and policy decisions, it is important for the City to explore a problem through the broader lens of public engagement. Gaining the perspective of directly and potentially affected parties adds depth and dimension to the problem definition. What may seem like a problem for City officials may have unseen benefits to the community. Similarly, information gathered by the City about an issue may not

include challenges obvious to those who live and work in or with the issue. By mutually defining a problem, the City is better prepared to develop solutions that are supported by the community and those directly affected by them.

Similarly, a mutually defined desired outcome is important to knowing what is important to the community in developing a plan or project that all parties can support. Answering the question: This project/plan will be success if...? helps to frame community values and desired outcomes. It also provides the basis for developing an evaluation process in Step 2. It is important to discern between interests and solutions when exploring desired outcomes, and to redirect suggested solutions to a discussion about what they achieve or deliver. For example, in a planning effort someone might say that a new park is the desired outcome. The underlying interest may be a place for children to play or friends to gather or the creation of green space or aesthetics. Teasing out the underlying interests creates an opportunity to achieve an outcome without limiting it to a single solution.

Step 2: Determine criteria and measures for the desired outcomes

Mutually defining the desired outcome(s) in Step 1 provides the foundation for developing criteria and measures for comparing and selecting alternative solutions or ideas. It is important to design and gain endorsement for an evaluation process that reflects community values before brainstorming potential solutions. This demonstrates the City's commitment to a fair and transparent process and a way to track and evaluate what is most important to the community.

The purpose of the evaluation process is to provide a structure for comparing options across values. It is not intended to numerically rank each option or alternative; rather, it is designed to provide information on the tradeoffs across several key values and criteria. The evaluation process is a tool for understanding the tradeoffs and looking for a balance the community can support. What might be a disadvantage to one person or group may be an advantage to another. Through this process all interested parties have an opportunity to share their perspective and look for ways to find mutually beneficial solutions.

Step 3: Brainstorm potential solutions to the problem

The process of brainstorming potential solutions is generally the most fun part of a decision process and one stakeholders want to jump into from the beginning of the process. In many cases, the City has identified a range of options before going to the public in a planning process. It is important to complete Steps 1 and 2 before getting into potential solutions to provide an opportunity for potential solutions to evolve out of a broader perspective based on the desired outcomes and community values identified in Step 1. Brainstorming should be as creative as possible and not be incumbered by discussion of why things will or will not work. On plans or projects where the City is looking for public input and involvement, the structure of this activity would be as inclusive and interactive as possible. If the City has made decisions or commitments, or there are parameters or limitations to what is to be considered, those should be shared. If there are examples from other plans, projects, or communities the City would like to present to generate ideas or get feedback, those can also be shared to stimulate discussion.

There are several techniques for engaging the community in the brainstorming phase. These include workshops, charrettes, online interactive activities, interactive displays in public areas, surveys, and

others. As with other activities, the more interactive the better with opportunities for the community to share and hear a wide range of perspectives and interests.

After the initial brainstorming, the City develops alternative solutions for evaluation. These can include any ideas the City has and should include the ideas generated by the public brainstorming process. They should also be distinctive from each other to test alternatives against different criteria and values. Ideas should be tracked and mapped to alternatives so the public can easily see how their ideas were incorporated into alternatives. If some ideas are not viable or realistic and cannot be used, they should also be documented with the rationale for not moving them into an alternative.

Step 4: Evaluate the alternatives using the agreed upon criteria

In Step 4, alternatives are evaluated in the preestablished evaluation process. For more complex projects, this may need to be a multistep process or ideas may need to be combined into packages of improvements that can be added to different alternatives. For most decisions, a range of three to five alternatives can be evaluated to provide a comparison between them. Criteria may be quantitative or qualitative, as designed in Step 2. The purpose of this step is to provide enough information about how each alternative addresses the values and criteria, and to share the evaluation results in a clear way. The easiest way to provide these results for comparison is in a matrix or table that allows the public and decision makers to see and compare how well each alternative meets the desired outcomes.

Step 5: Consider tradeoffs among alternatives

Step 5 shares the evaluation of the alternatives to open discussion and understanding of how different options impact desired outcomes. It helps the community see where ideas are mutually exclusive or contradictory and how they may positively or negatively affect interest groups or stakeholders. The goal of this step is not to rank or vote on an alternative, it is to use what it learned through discussions of tradeoffs to guide the selection of a preferred alternative, either one of the evaluated alternatives or one that evolves out of the community dialogue. If this step leads to the development of one or more new alternatives, Steps 4 and 5 are repeated to identify community preferences and determine a preferred alternative.

Step 6: Develop recommendations to the decision makers

The preferred alternative will be the basis for a recommendation to City decision makers. City interests and limitations should be included in Steps 1 through 5 to ensure that they are considered throughout the process. Recommendations should document the process the City followed to develop the recommended alternative, including the activities for involving the community, a summary of each step of the process, and any unresolved issues or challenges. If the process was followed and City and community criteria were addressed, the recommendation should meet the City's desired outcomes and limitations.

Modular and Flexible

Each of the steps is critical to a fair and transparent decision process; however, the time needed for each step and the number of meetings or activities devoted to each step should be adapted to the nature and complexity of the project or decision. For example, if the problem is well understood and

agreed upon by all stakeholders, Step 1 can be a quick review and confirmation of the problem definition and desired outcomes, accomplished in the same meeting as developing the evaluation criteria and measures. For more complex and potentially controversial projects, several outreach activities and discussions may be needed to develop consensus on the problem definition and desired outcomes. Process design should consider the appropriate and reasonable number of meetings and activities needed to move the process forward in a way that keeps stakeholders engaged and does not feel like it is missing any of the key steps. Process design should include a timeline that shows the steps and activities, allowing the community to see how long the process will take and when key milestones of decision making are anticipated.

Every public action needs to consider the appropriate level of engagement and document all activities to engage the public, including any constraints and limitations on engagement. It may not be realistic to implement an inclusive engagement process for every City initiative due to budget, timing, legislative requirements, or staffing constraints. Each City action should include engagement considerations and document constraints and activities.

In-person and Virtual Community Engagement

Community engagement should be structured to encourage the sharing of perspectives across interest groups and individuals. In-person events are easily structured to encourage dialogue and conversation. Where in-person meetings are not feasible or appropriate, efforts should be made to create virtual environments that are as interactive as possible to encourage the community to share and understand a broad range of perspectives. It is important to provide interpretation services as needed to reduce language barriers and support communication between stakeholders.

There are times when virtual meetings, or a combination of virtual and in-person meetings provide greater flexibility to working families with children, who have limited time, transportation, or child care. Virtual meetings were also essential to continue public engagement during the COVID-19 pandemic, providing a safe option for participation. Whether in-person or virtual, forums should be structured to encourage interaction between community members and groups. Formal presentations by agency and subject experts should be minimized and opportunities to share ideas and perspectives should be maximized.

Identifying Key Stakeholders and Audiences

Effective community engagement is broad and deep. It allows all potentially interested or affected parties to be involved at the level appropriate to their interest. It should cast a broad net to identify stakeholders and meet the full range of levels of interest. Some residents or businesses may want to be kept informed while others have a vested interest in the outcome and want to influence the decisions that are made. It is important to understand the range of audiences, stakeholder, and interested and affected parties to develop outreach activities that meet their needs.

Some of the critical considerations for identifying and engaging stakeholders include:

What level of interest does the general community have in this policy, plan or project, and how does that vary across different groups?

What groups or individuals are potentially affected by the development of this policy, plan, or project?

How can we engage the most affected community members from the beginning?

What is the City asking of participants in the public process (e.g. time, input, resources, expertise, etc.) and is it clear to the participants what they are being asked to provide?

Considerations for Engaging Underrepresented Stakeholders

Engaging traditionally marginalized communities in decision-making processes is critical to realizing the full and authentic potential of sustainability and prosperity in Wilsonville. Public participation processes that are perfunctory and superficial do not include opportunities to share stories, access community assets and knowledge, or include all community members and organizations in shaping the agenda, the process, and the ultimate decisions. To be truly inclusive, the City must treat all members of the community as an asset and understand that community-based organizations bring important capacities and relationships that the City can leverage to produce more effective community outcomes. However, not all underrepresented members of the community are part of an organization. It is important to identify and engage all potentially interested or affected parties during outreach design and throughout the process. One way to do that is to continually ask, “who are we missing, who else should be involved,” in the early public meetings and as new issues arise.

The City’s DEI Committee serves to connect Wilsonville to the diverse perspectives and lived experiences of its people. The committee advocates for equitable access and opportunity for every community member. It identifies barriers to participation and inclusion, and pursues programs, policies, partnerships and ideas that remove those barriers. City projects, plans or other actions should engage the DEI Committee in identifying potentially affected, historically underrepresented parties and stakeholders as part of developing an inclusive engagement strategy and activities.

It is essential to build bridges to underrepresented groups by creating a safe space conducive to sharing experiences, ideas, and preferences. Overcoming cultural and language challenges that may limit engagement should be a priority in the design and implementation of public outreach and engagement. This can be done through identifying and working with community ambassadors or advocates to directly address obstacles to participation. Clearly defining the purpose of involvement and how community involvement will be used to shape decisions is important.

It may be necessary to engage intermediaries to facilitate the inclusion of traditionally underrepresented parties. Intermediaries can help bridge the gap between the groups who trust them and other stakeholders. They can also support coalition building and information sharing between experts and partners to reach underrepresented communities. If groups are not represented and intermediaries cannot be identified, City staff should acknowledge and document the perspectives which are not represented in the conversation and the process.

It is important to work directly with historically underrepresented groups to learn the best ways to reach them and identify what circumstances or accommodations would make them more comfortable in engaging. This may include finding points of influence in different groups and asking them for strategies for engagement. Implementing this approach will require that City officials invest their time in the process and appreciate that meaningful community engagement requires

commitment to the principles outlined in this framework.

The following groups, communities, and organizations should be considered in developing an engagement approach that includes historically underrepresented groups:

To be determined by the DEI Committee

Some barriers to engaging traditionally underrepresented stakeholders and potential actions for overcoming the barriers are provided in 2 below.

Table 2: Barriers and Actions

Barrier	Potential Action
Participant resources	
Time needed to participate	Offer a variety of times and amount of time required. Streamline the process. Offer incentives to participate.
Ability to travel to meetings	Locate activities close to underrepresented communities, near bus service, and provide or subsidize transportation to meetings. Provide a hybrid model for online and in person engagement.
Childcare	Provide onsite childcare and activities to engage youth in the project.
Limited knowledge of, or access to technology	
Internet access	Provide computer and internet access at public facilities.
Comfort with online platforms	Simplify access and provide support. Provide training on different platforms through the school Family Empowerment Center or County fund for technology training and access for seniors.
Lack of trust in government	
Past experiences with government	Document the range of past negative experiences and actively address concerns.
Fairness of the process	Clearly define the process and maintain transparency.
Fear of government	Hold meetings in safe environments (schools, churches, neighborhood meeting places).
Language	Provide translation services and community liaisons. Use a variety of media – spoken, written, graphical – to overcome language barriers. Include information on how to request translation services in a variety of languages. Identify languages in targeted areas to include languages besides

Barrier	Potential Action
	English and Spanish.
Cultural	Make accommodations for cultural and religious holidays and norms. Include members of diverse groups as information resources at events (familiar faces). Consider differences in government processes from countries of origin for immigrants and provide support for understanding differences (e.g., citizens academy).
Physical	Provide accommodations for varying physical abilities and limitations. Check facilities in person for accessibility prior to scheduling meetings or events there.
Lack of project awareness	Provide information across a wide range of media, formal and informal, including traditional media, printed mailings and social media. Post notices in parks, libraries, schools, SMART buses, apartment complexes, senior housing. Use radio and word of mouth in targeted communities.
Power differentials and dynamics	Assess, document, and address full range of potential power dynamics related to the initiative. Reach out and personally invite underrepresented individuals and groups. Meeting facilitators should be aware of power differentials and ensure participants are given an opportunity and made comfortable to speak up.

Questions to Consider

In developing an outreach strategy and identifying tools, consider the following questions:

How does the overall demographic makeup of those who are engaged in the public process compare to the overall makeup of the city?

Who is underrepresented and how does the proposed policy, plan, or project potentially affect them?

Are there historic and current power imbalances that should be considered in the design of the public engagement process to be inclusive?

Who are the key organizational partners and intermediaries? Are specific community leaders, business associations, or activists engaged? Are these partners aware of and actively addressing historic inequities?

What background information will historically underrepresented groups need to participate effectively? How will that information be prepared and delivered?

Are there power dynamics based on historic, financial, political, or other advantages that may impact an individual's or group's ability to influence decision making?

Actions to Overcome Barriers

The following are general principles to guide City actions to overcome barriers to inclusive public engagement:

Create welcoming, safe environments by asking the underrepresented communities how this can be achieved

Design a process that is friendly to working families

Go to the community (work places, public gatherings, social and religious organizations, schools)

Be transparent and open throughout the process by engaging the community in how the City can build trust in the engagement processes

Explain how public engagement is used in decision making

Be accessible and responsive

Use a variety of low-tech/high touch and high-tech opportunities to participate

Provide information through a wide range of media

Build community connections for ongoing engagement

Provide language translation services for all potentially affected parties

Strategies for Outreach and Engagement

This section discusses a range of strategies for public outreach and engagement. In addition to the tools described below, the City should consider the capacity of staff and the community to engage in an effective outreach effort. Outreach and engagement activities should be included in the scope of work for all City initiatives to ensure that it is a formal part of the process and adequate resources are available for effective engagement.

From the City's perspective, the following questions should be considered in designing and implementing a public outreach process:

Does the City have the resources to design and facilitate an effective public process?

Does the staff have the appropriate training and skillset to engage a diverse set of community members in the decision-making process?

Does the staff need trainings on racial disparities, equitable practices, and other topics to help understand and respond to what they are hearing from community groups?

Does the staff represent and/or have a history of working with the community groups that need to be included in the process?

An honest assessment of these questions at the outset can prepare the City for challenges and allow additional resources and capabilities to be brought into the process from the beginning.

Similarly, the City should consider the community's capacity to engage effectively in a process. If the issues are complex or historically underrepresented groups with little experience engaging in public

processes are involved, there may be a need to support them. The City should consider:

What kinds of training or materials will community members need to engage in the decision-making process comfortably and meaningfully?

How will the materials and information be delivered in a way that ensures accessibility for a diverse range of community groups?

Are translation services or other communication supports needed to engage a broader community?

Menu of Outreach Activities

The following is a list of public outreach activities that can be used to inform, solicit input, or engage the public. The list is not exhaustive and is provided as examples of ways to engage or share information with the public. There is a general description of each and discussion of how and when they are applicable. A summary table of the application of each tool is shown in Table 3. In selecting tools for public outreach, it is important to consider the average age or digital literacy of targeted groups and potential barriers of each tool to engaging historically underrepresented groups.

Public Meetings

Public meetings can be used to provide information, solicit input, and engage the public depending on how they are structured. They can vary in the size and formality of the meeting. Meetings that are intended to engage the public in a dialogue and sharing of ideas and perspectives should minimize presentations by the City (talking at the public) and maximize opportunities for interaction (dialogue, brainstorming, breakout groups – listening to the public). Specific types of public meetings are discussed below. Each brings a different focus or structure to enhance interaction with the community.

Workshops

Workshops are a particular type of public meeting used to encourage collaboration between the City and the community. They are generally focused in terms of their scope and structured to allow cooperative problem solving. Workshops can be designed using a wide variety of interactive formats: breakout group, stations focused on specific issues or aspects of a plan or project, tabletop exercises, brainstorming sessions, presentations and videos, community-driven dialogues, and others. The main purpose of workshops is for the City and the community to work together and to share ideas and perspectives.

Focus/Community Interest Groups

Focus groups or interest groups are smaller public meetings focused on a specific issue, interest, or stakeholder group. These groups can be formed to engage a specific or diverse set of interests throughout a planning process or can be formed ad hoc as issues arise that need input and involvement by targeted groups. Focus groups can also be used to engage traditionally underrepresented stakeholders to ensure that their interests are included in the process.

Charettes

Charettes bring together City officials, planners, designers, and public stakeholders in a collaborative working meeting to address planning and design issues. Charettes may be time intensive, bringing stakeholders together to solve problems over one or more days. These can be held at key steps in the process to support the problem definition or the development and revision of potential solutions.

Visioning Workshop

Visioning or future search workshops are useful in identifying community values and preferences. They should include a broad range of interests and disciplines in support of strategic planning or policy development. These workshops allow participants to share what is important to them, what they want to change, and what they want to build on in the future.

Open Houses

Open houses are one of the least structured public meeting options. They allow the public to drop-in and interact at their level of interest. Open houses should provide information about a policy, plan, or project; include opportunities for the public to ask question and give input on what is presented; and allow participants to interact with City officials involved in the process. Open houses should provide a variety of ways for gaining and documenting input through comment forms or recorders to capture comments. Information is provided through displays and handouts, with opportunities to discuss issues directly with City officials involved in the policy, plan, or project development.

Social/Community Events

Information about City initiatives can be brought to social and community events to provide information about policies, plans, or projects the City is working on. Information displays at community events increase the visibility of the initiative and allow interested citizens to learn about the effort, talk to City staff, provide input, and follow-up by accessing online information or getting involved in community engagement activities. Targeting a variety and diversity of events, the City can inform and potentially engage interested parties that are not traditionally engaged in policy and planning activities. An important event to focus on is the City's annual block party which in the past has brought diverse members of the community. The Farmers Market and cultural celebrations are also good places to reach the community through information tables and flyers.

Websites

Websites specific to City initiatives can provide 24/7 access to information. They can be designed to include surveys, subscription push notifications of updates and key decisions, and interactive tools that allow the public to engage in the project. For complex policy issues, agencies have developed games that allow users to make choices and indicate priorities through fun and simple exercises. The results can be compiled to give decision makers a better sense of community values. Websites should be up to date and clearly track the status of the process. Let's Talk, Wilsonville is a "virtual City Hall" that features City projects and provides opportunities to provide input. Project sites on Let's Talk, Wilsonville! Include a brief description and survey questions that change over the life of the project to allow interested parties to provide focused input.

Surveys

Surveys are a tool for sharing information with, and gaining input from, the public. They can be conducted in-person, by phone, online, and by mail. Surveys can be included in other activities such as community events, open houses, project websites, or newsletters. Surveys are most helpful when there is a need to gain input on what is important to the community. Surveys should be short, focused, and easy to complete. They should be designed to collect input rather than as a voting tool

and should include opportunities for comments or open-ended questions. Use paper surveys as well as electronic surveys to reach those who are not comfortable with or do not have access to technology.

Mailings

Mailings can be targeted or general to provide information on a project or invite participation in public engagement activities. Targeting mailings about a policy, plan, or project can be used to reach groups that may have a specific potential interest, those who may need additional encouragement to participate, or those who do not have internet access or have language limitations. Developing targeted mailings in Spanish or other languages, and mailing lists of those who are unlikely to receive emails or visit websites is important to reaching those who are traditionally underrepresented in City processes. The information used in mailings can also be used as flyers and posted in libraries, schools, parks, SMART buses, apartment complexes, and senior housing. Including a QR code to access the website makes it easy to capture the information quickly.

Emails

The City maintains a number of public email lists that can be used to provide updates on City activities. These should be used to deliver information on policies, plans, and projects with an option to opt out of future emails. Email can be used to notify the public of outreach activities and linked to project websites.

Newsletters

Newsletters can be electronic and delivered through email and websites, or printed and mailed or distributed at public meetings, community events, or public venues such as libraries and recreation centers. Newsletters provide information to the public and should document the public process and direct readers to websites, events, and City contacts. The City can also work with homeowners associations, business groups, and community organizations to include project updates in their member newsletters.

Social Media

Social media provides a format for quick updates and information about events and key milestones in a public process. It can be used to augment other information sources and direct readers to more comprehensive sources such as project websites. Social media is a good way to reach younger community members.

News Articles

Articles in the Spokesman and Boones Ferry Messenger can help disseminate information about policies, plans, and projects that are newsworthy. Media releases should be coordinated through the City's Communication and Marketing Manager.

Wilsonville TV

Wilsonville TV provides an opportunity to share information through live and recorded videos of committee meetings and planning efforts, such as this video on the [Frog Pond planning conversation](#).

This information is easily accessed on the Wilsonville YouTube channel 24/7 and can be more engaging than a static website. Links to process-specific videos should be included on the project website and in other information pieces.

Table 3: Application of Outreach Tools

Activity	Information	Input	Engagement
Public Meetings	✓	✓	✓
Workshops	✓	✓	✓
Focus/Community Interest Groups	✓	✓	✓
Charettes	✓	✓	✓
Visioning Workshop	✓	✓	✓
Open Houses	✓	✓	✓
Social/Community Events	✓	✓	
Websites	✓	✓	
Surveys	✓	✓	
Mailings	✓		
Emails	✓		
Newsletters	✓		
Social Media	✓		
News Articles	✓		
Wilsonville TV	✓		

Public hearings are not included in this list. Although a formal public hearing may be a required final step to adopt or approve a policy or plan, public hearings should not be considered a tool for public engagement. By working collaboratively throughout the process, the City should be able to address public concerns in developing a final policy or plan. This should lead to final recommendations that are accepted or supported by the community. There should be no surprises by the time a policy or plan gets to final approval or adoption. Time should be provided during the hearing for public comment for interested parties to express their concerns or support; however, if issues are raised that were not addressed during the public process, the process itself was not as robust as it needed to be.

Measure Success

After each public outreach or engagement process, it is important to assess effectiveness and document what worked, what could have worked better, what did not work, and why. This

information can be used to improve the outreach framework and future outreach efforts. Some of the questions to consider in determining how successful the public outreach process was include:

Did Wilsonville officials learn new information about the needs or priorities of the community, particularly from segments of the community that have historically been excluded from, or marginalized in, government decision making?

Did community participants learn about the constraints Wilsonville officials face, such as limited resource or legal barriers, the unintended consequences of certain policies, or conflicting community needs?

Were the organizations, participants, and City officials involved able to explore new and creative solutions through dialogue, listening, and learning from each other?

Are there concrete ways that the community involvement influenced the final strategy?

Did the City explain why some community recommendations or requests were not included?

Did participants, especially those from low-income communities of color and other vulnerable or disinvested communities, build political power and gain more access to government decision makers that they can leverage for influencing future processes or decisions?

Was the recommended policy, plan, or project adopted and implemented?

Attachment F – Limited English Proficiency Plan

CITY OF WILSONVILLE/ SMART SERVICES

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Original Plan: November 28, 2016

Update: August 2026

SMART is required to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of our programs and activities of individuals who have Limited English Proficiency (LEP). SMART consulted the USDOT's LEP Guidance and performed a four-factor analysis of contact with the public to determine the appropriate mix of LEP services to offer.

Four Factor Analysis:

1. The number or proportion of LEP persons in the service area.

Data was gathered from the Census Bureau's 2024 American Community Survey 5-Year Estimates (Table 1) to identify information on persons who speak languages other than English at home, who speak English less than very well and are therefore classified as limited English proficient or "LEP".

According to the 2024 American Community Survey (ACS) Estimates, out of the total population in Wilsonville aged 5 years and over, 13.8% spoke a language other than English at home. This is up from 11% in the 2020 ACS Estimates. The data show that the highest percentage of population 5 years of age and over who spoke a language other than English at home is Spanish speakers, at 7.4%. The number of people in the Limited English Proficiency (LEP) population (who speak English "less than very well") is estimated to have held steady at roughly 4% between the 2024 and 2020 ACS Estimates.

The largest portion of the Limited English Proficiency population in Wilsonville speaks Spanish (40.7%), followed by speakers of Other Asian and Pacific Island languages (14.1%), Other Indo-European languages (12.3%), and Arabic (11.1%). Spanish speakers with limited English proficiency make up 1.6% of the total population of Wilsonville.

2. The frequency with which LEP individuals come into contact with SMART service.

SMART serves people with limited English proficiency daily via our buses, paratransit, demand response services, and community programs. Therefore, communication of any service change is very important. SMART has a translation system in place for customer service phone lines.

Table 1. Languages Spoken at Home for Population 5 Years and Over in Wilsonville

Language Spoken at Home	Total Population	% of Total Population	LEP Population	% of LEP Population
Total:	25,779	100%	1006	
Speak only English	22,218	86.2%		
Spanish:	1,916	7.4%	409	40.7%
Other Asian and Pacific Island languages:	254	1.0%	142	14.1%
Other Indo-European languages:	344	1.3%	124	12.3%
Arabic:	338	1.3%	112	11.1%
Russian, Polish, or other Slavic languages:	207	0.8%	80	8.0%
Vietnamese:	84	0.3%	72	7.2%
Chinese (incl. Mandarin, Cantonese):	61	0.2%	28	2.8%
Korean:	61	0.2%	22	2.2%
German or other West Germanic languages:	123	0.5%	12	1.2%
Other and unspecified languages:	67	0.3%	5	0.5%
French, Haitian, or Cajun:	51	0.2%	0	0.0%
Tagalog (incl. Filipino):	55	0.2%	0	0.0%

Source: 2024 American Community Survey, 5-Year Estimated. (C16001)

3. The nature and importance of service provided by SMART.

SMART provides important transit services to the City of Wilsonville through its fixed route, paratransit, Safe Routes to School and bicycle/pedestrian programs, and at Wilsonville Transit Center. The Transit Welcome Center at the Transit Center opened to the public on May 27, 2026, operating Monday through Saturday with customer service representatives providing trip planning and other pertinent information to the traveling public.

SMART serves the transit needs of the City of Wilsonville and provides critical regional links to six (6) other providers:

- Cherriots (Salem Area Mass Transit District) at Salem Downtown Transit Center
- TriMet (Tri-County Metropolitan Transportation District of Oregon) through connections at Clackamas Town Center, Tualatin Park & Ride, and WES commuter rail platform at Wilsonville Transit Center
- Canby Area Transit at Canby Transit Center
- Woodburn Transit System at Woodburn Memorial Transit Center
- Clackamas County Transit at Oregon City Shopping Center
- Sandy Area Metro at Clackamas Town Center

4. The resources available to the recipient of the federal funds to assure meaningful access to the service by LEP persons.

SMART has been providing information in Spanish such as surveys, bus routes, schedules and fares, public service announcements and general information on the buses and website. In addition, the City has provided interpreters at public meetings and has a translation system in place for customer service on the phone. The SMART website includes a Google Translator tool, which translates all pages on the website into more than 80 languages.

Implementation Plan:

Based on the four-factor analysis, SMART recognizes the need to continue providing language services in the area. A review of SMART's relevant programs, activities and services that are being offered or will be offered by the City as of August 2026 include:

- Spanish speaking representatives are available upon request.
- Language line incorporated into the customer service phone service.
- Route and schedule information are available for Google translation into Spanish and many other languages on the SMART website.
- SMART Options brochures are available in Spanish with information for bicycling and pedestrian safety.
- Annual transit surveys conducted by SMART are available in Spanish.

SMART's outreach and marketing initiatives have yielded a list of community organizations that provide service to populations with limited English proficiency. The following list of community organizations and schools in the area have been contacted to assist in gathering information and see what services are most frequently sought by the LEP population:

Wilsonville High School	Northwest Housing Alternatives
Wood Middle School	Wilsonville Community Center
Boeckman Creek Primary	Wilsonville Public Library
Boones Ferry Primary School	Wilsonville City Hall
Meridian Creek Middle School	Wilsonville businesses w/ 100+ employees
Lowrie Primary School	

All SMART buses are stocked with comment forms in both Spanish and English. Passengers may submit a comment, question, or complaint and request that someone contact them in Spanish or English so they may have full and effective access to SMART services and programs. A copy of the comment form can be found as Attachment F.

SMART will continue to contact the community organizations that serve LEP persons, as well people with limited English proficiency themselves, and perform four-factor analysis every three years to identify what, if any, additional information or activities might better improve SMART services to assure non-discriminatory service to LEP persons. SMART will then evaluate the projected financial and personnel needed to provide the requested services and assess which of these can be provided cost-effectively.

Attachment G – Title VI Standards and Policies

TITLE VI STANDARDS AND POLICIES

Pursuant to requirements set forth in the Federal Transit Administration's FTA Circular 4702.1B, SMART must establish and monitor its performance under quantitative Service Standards and qualitative Service Policies. The service standards contained herein are used to develop and maintain efficient and effective fixed-route transit service.

FTA TITLE VI STANDARDS AND POLICIES

The FTA requires all fixed-route transit providers of public transportation to develop quantitative standards and qualitative policies for the indicators below:

- a. Vehicle Load Standard;
- b. Vehicle Headway Standard;
- c. On-time Performance Standard;
- d. Service Availability Standard;
- e. Vehicle Assignment Policy; and
- f. Transit Amenities Policy.

(VEHICLE) PASSENGER LOAD FACTOR

Standards for passenger capacity are used to determine if a bus is overcrowded. The chart below shows the Maximum Safe Capacity of each type of bus in revenue service, both seated and standing. The Maximum Load Factor is the ratio between seated and standing capacity.

Standard: SMART's standard for all routes for Maximum Load Factor is 1.5, except in the case of freeway express buses traveling more than 55 mph, which then is 1.0.

Vehicle Type	Seated	Standing	Maximum Safe Capacity	Maximum Load
26 ft. Bus	21	7	28	1.3
30 ft. Bus	33	10	43	1.3
35 ft. Bus	35	11	46	1.3
40 ft. Bus	37	12	49	1.3
40 ft. Highway Bus	45	0	45	1.0

Measure: Vehicle load issues will be measured through customer complaints, driver feedback and supervisor on-board reviews.

VEHICLE HEADWAY

Vehicle headway is the measurement of the frequency of service and is the scheduled time between

two trips traveling in the same direction on the same route at a given location.

Standard: Target headways for routes are set in each Transit Master Plan update.

Measure: Any changes to a route schedule (such as increases or decreases to headways) that affect 25% or more of the daily vehicle trips on the route will go through a Title VI service equity analysis. This will ensure that the benefits and burdens of the change are distributed equitably among the minority/disadvantaged populations and non-minority/non-disadvantaged populations that SMART serves.

ON-TIME PERFORMANCE

On-time performance is a measure of trips completed as scheduled.

Standard: SMART has set a standard that at least 90% of all trips will be on time at major timepoints. A bus is considered “on time” at a timepoint if it departs within 0-5 minutes of the schedule, “late” if it departs more than 5 minutes after the scheduled departure time, and “early” if it departs before the scheduled departure time for that timepoint.

Measure: Schedule adherence will be measured through computer software that is connected to an AVL on each vehicle. The software provides highly accurate on-time performance data regularly throughout each day. Ride checks, field checks, and trip checks will be performed periodically to ensure the computer program maintains accuracy.

Even though SMART does not control the speed or reliability of the roads, only 6.7% of all trips during the reporting period from July 1, 2023 through June 30, 2026 operated more than five (5) minutes behind schedule; thus achieving 93.3% goal of on time performance. With the availability of Bus on Shoulder program (for transit vehicles to use the highway shoulder during periods of traffic congestion), SMART intends, at minimum, to maintain the established on-time performance goal.

SERVICE AVAILABILITY

Service availability (a.k.a. service access) is a general measure of the distribution of routes within the SMART service area.

Standard: SMART’s goal is to provide fixed route transit within ½ mile of 65 percent of City residents.

Measure: Transit access is determined by mapping all active bus stops within the system and then calculating the residential population (based on the most recent available Census data) within 1/2 mile on the walking network of those stops. Additional insights can be gained by analyzing the percent of residents near services of different qualities, and the percent of minority or low-income residents near services.

The City of Wilsonville City Council determines policy priorities for local land use and development decisions. As a department of the City, SMART works in concert with the Community Development Department to ensure that transit accessibility is top of mind along local streets to support transit operations. Through a collaborative interdisciplinary approach, SMART provides public transit service through the provision of easily accessible bus stops, a well-designed transit center, and connectivity with local transit service providers.

VEHICLE ASSIGNMENT POLICY

Vehicle assignment refers to the process by which transit vehicles are placed into service on routes throughout SMART's system.

Standard: Vehicles are rotated throughout the SMART system, with newer vehicles serving all areas of the system. Specific vehicles are assigned to routes only when required by operating conditions (e.g., in cases where a smaller bus is required to provide service on narrower streets; a larger bus is required for additional seating capacity; or a non-electric bus is required for a longer operating block without a charging opportunity).

Measure: Daily assignments of vehicles are reviewed to ensure that vehicles are assigned based on daily operational needs, expected ridership and safety considerations.

DISTRIBUTION OF TRANSIT AMENITIES

Distribution of Transit Amenities is a general measure of the distribution of transit amenities (items of comfort, convenience and safety) available to the general riding public. Although some amenities are provided by developers in new growth areas, SMART will use ridership as the primary criterion for determining amenity level and placement when public funds are used.

Standard:

Bus stop signs: SMART ensures that bus stops are easily identifiable, safe, and accessible places to wait for the bus.

Seating: Seats are added to bus stops where the number of daily riders is 6 per day or more and where there is available space for the seat.

Shelters: The minimum threshold for SMART to consider shelter placement is an average of 10 or more boardings per weekday. SMART will evaluate placing a shelter and will endeavor to do so within the limits imposed by the available space. A seat bench and a trash can are provided at all shelters. Shelters are provided at all stops located at the Wilsonville Transit Center.

Measure: Periodically, SMART reviews ridership levels per route and per bus stop to make decisions on how limited resources should be spent.