

# Title VI Service Equity Analysis

## GoRaleigh Fall 2021 Service Changes- Route 6 and 70X

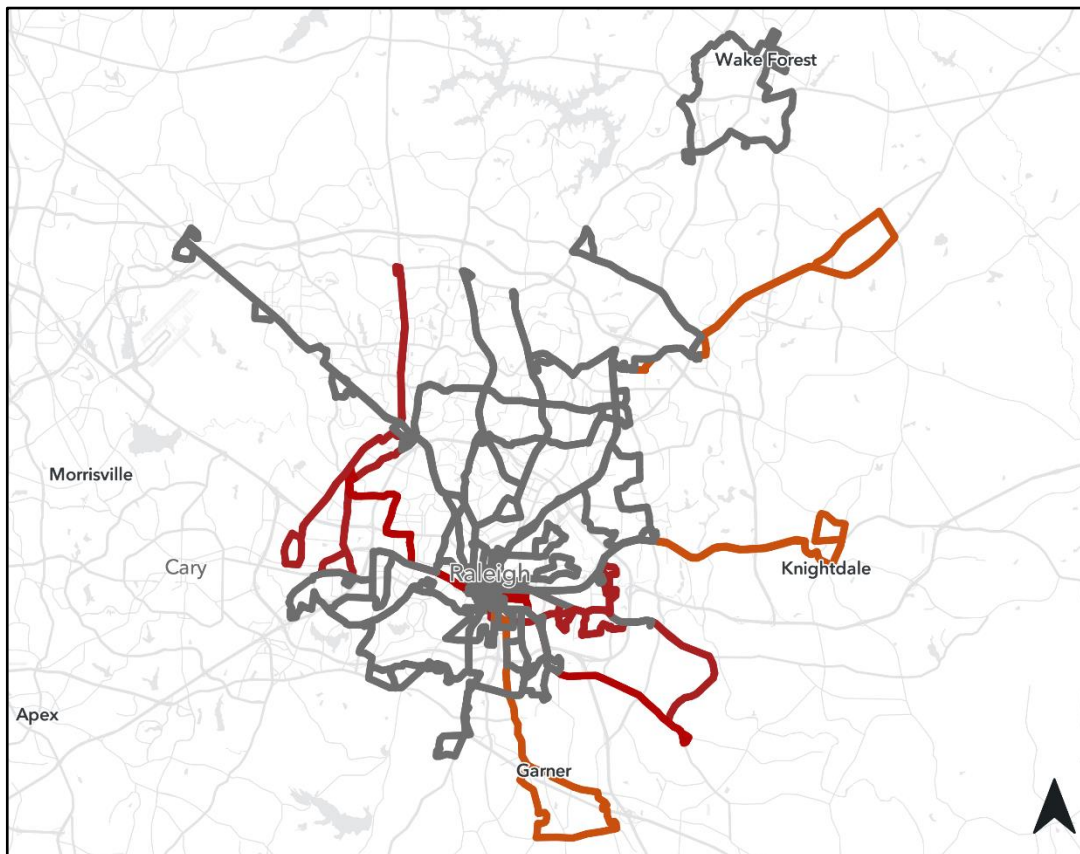
### INTRODUCTION

GoRaleigh is an independent subsidiary of the City of Raleigh, which is responsible for providing fixed route, public transportation service in Raleigh, North Carolina. GoRaleigh and the City of Raleigh's Department of Transportation- Transit Division administers public transportation for the city, including a fixed route transportation system, paratransit service, and a free downtown circulator. The agency currently provides 40 fixed routes, of which include connector routes, express routes, and a downtown circulator.

GoRaleigh serves much of the Raleigh urbanized area and now the towns of Rolesville, Garner and Knightdale, as shown in **Figure 1**. The system provides approximately 5-million fixed-route passenger trips annually, 30-thousand passenger trips per weekday and an additional 500-thousand annual paratransit trips.

GoRaleigh is conducting a service equity analysis under Title VI of the Civil Rights Act of 1964 to evaluate proposed Fall 2021 service changes for Glenwood Route 6 and Briar Creek Express Route 70X.

**Figure 1: Service Area for GoRaleigh System, as of early 2021**



## BACKGROUND

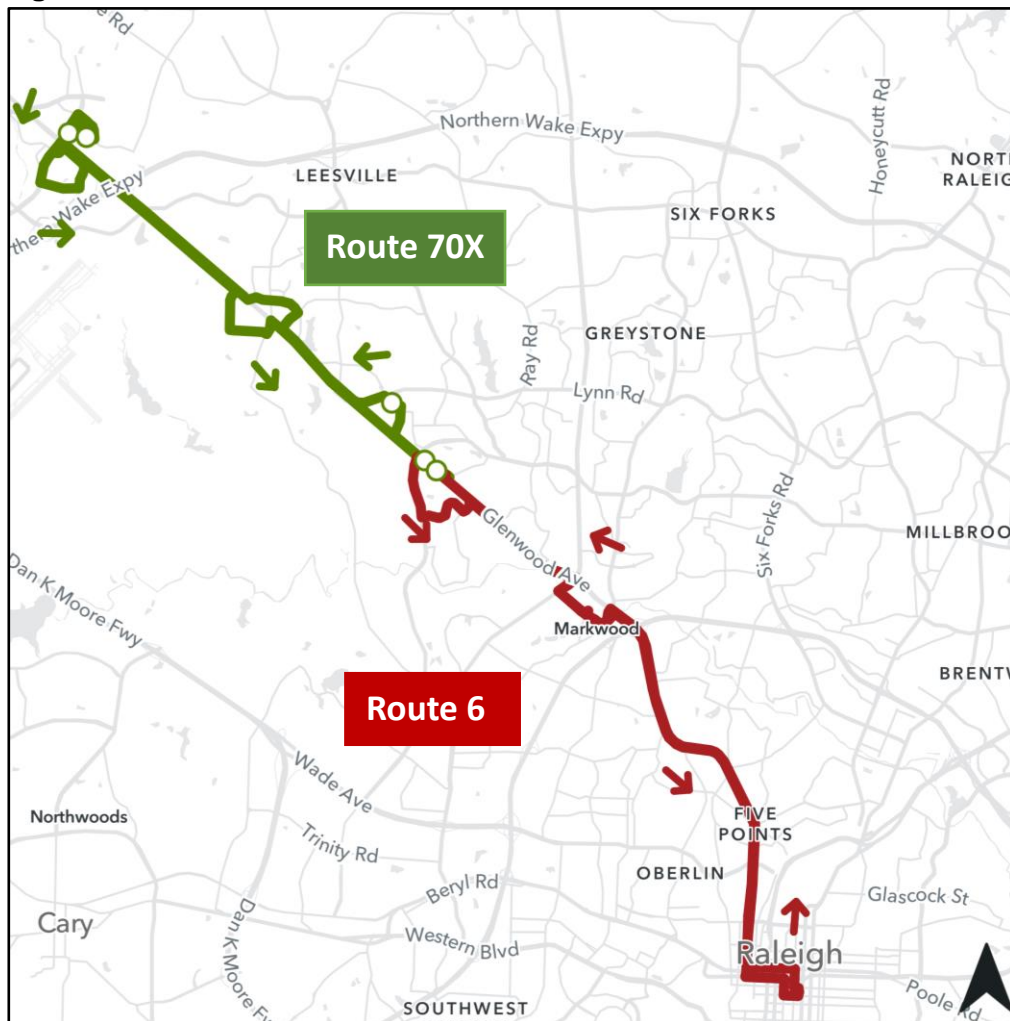
The 2016 Wake County Transit Plan outlined a broad set of planning and investment priorities for all Wake County transit agencies. A corresponding Short-Range Transit Plan outlined details on the proposed changes for each agency, under the initial years of the Wake Transit Plan.

In both plans, it was identified for GoRaleigh to implement service adjustments and improvements along Glenwood Avenue. These changes are a part of the agency's ongoing effort to enhance transit services and improve efficiency. In addition, it directly supports one of the four "Big Moves" identified in the Wake Transit Plan- *Enhanced Access to Transit, with increased service hours and frequency throughout the system.*

Although the proposed changes were originally identified for FY 2021, implementation plans were postponed due to the unknown impacts of the COVID-19 pandemic. After much deliberation over the operational and financial impacts of the pandemic, the funding was approved by the Transit Planning Advisory Committee (TPAC) during the FY 2021- Quarter 2 amendments.

Staff is now providing the proposed service changes to the Raleigh Transit Authority (RTA) for its consideration and a Fall 2021 implementation.

**Figure 2: Routes 6 and 70X**



## TITLE VI GUIDELINES

Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination based on race, color, or national origin under any program or activity receiving federal financial assistance. Federal Transit Administration (FTA) Circular 4702.1B was published by the agency in October 2012 to comply with the law and fulfill the requirement for transit agencies receiving Federal funds to develop and implement an agency-wide Title VI program.

Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" is a directive from the federal government to prevent minority communities and low-income populations from being subject to disproportionately high and adverse environmental effects. The FTA circular on Title VI compliance states that while low-income populations are not a protected class under Title VI, there is an "*...inherent overlap of environmental justice principles in this area, and because it is important to evaluate the impacts of service and fare changes on passengers who are transit-dependent, FTA requires transit providers to evaluate proposed service and fare changes to determine whether low-income populations will bear a disproportionate burden of the changes.*"

Title VI protections address a wide range of population groups with respect to potential discrimination that maybe experience based on their age, race, ethnicity, color, country of origin, immigration status, physical/mental disability, sex (gender), or religious affiliation.

As a grantee receiving FTA financial assistance, GoRaleigh is required to demonstrate compliance with FTA Circular 4702.1B when undertaking applicable actions. The circular outlines requirements for determining and addressing potential disparate and disproportionate impacts that major service changes may have on minority and low-income populations, respectively.

According to Chapter 4 of the FTA Circular, fixed route transit providers that are in urbanized areas with a population of 200,000 or more and operate 50 or more fixed route vehicles in the peak are required to thoroughly study the impacts of any fare or major service changes and consider mitigation strategies as needed. As GoRaleigh meets these thresholds, the agency is required to perform a Title VI Service Equity Analysis of any proposed major service change as it relates to potential impacts to minority and low-income populations.

## METHODOLOGY

This service equity analysis includes:

- reviewing proposed route changes and determining whether it constitutes major service changes requiring further analysis,
- identifying any Title VI or low-income populations within the transit service area for each of the current and proposed routes,
- determining whether planned service changes will have a disparate impact on minority populations protected under Title VI, and
- evaluating service changes to determine whether low-income populations will bear a disproportionate burden of the changes.

Considering the proposed service changes will add frequency to both routes and the service area remains the same, the analysis examined the existing service areas of both routes. The data used included:

- Demographic data from the US Census Bureau, 2015-2019 American Community Survey (ACS) 5-Year Estimates, which included:

*Population*, which is coded by table B03002, field B03002001.

*Low-income status*, set at 150% of the US federal poverty level, which is coded by the appropriate fields in table C17002.

*Minority*, coded by table B03002, which subtracts the white, non-Hispanic population (B03002003) from the total population (B03002001).

The analysis incorporates two assumptions: 1) 'Low income' is defined as 150% of the census defined poverty rate and 2) 'Service area' includes a breakdown of every census block group within the designated area.

The analysis is based on GoRaleigh's Disparate Impact and Disproportionate Burden Policies included in the Title VI program, updated February 2021. With both policies, if adverse effects are identified, GoRaleigh will consider modifications and mitigation measures to reduce the impacts. Adverse effects are service changes that decrease transit access, in comparison to other services or the overall system.

- *Disparate Impact policy*- GoRaleigh consider impacts to be disparate any time adverse impacts borne by minority populations differ from impacts borne by non-minority populations by **5%**.
- *Disproportionate Burden policy*- GoRaleigh considers impacts to be disparate any time adverse impacts borne by low-income populations differ from impacts borne by non-low-income populations by **2.5%**.

The analysis of impacts to minority and low-income populations are determined on a route-by route basis and based on the direct transit service to the area. Impact comparisons are made using population data around impacted routes compared with the population of the overall GoRaleigh service area.

### Population Definitions

*Minority Populations*- According to FTA Circular 4702.1B, "minority" is defined as: American Indian and Alaska Native, Asian, Black, or African American, Hispanic, or Latino, and Native Hawaiian or Other Pacific Islander.

*Low-Income Populations*- According to the FTA circular, “low-income” means a person whose median household income is at or below the U.S. Department of Health and Human Services poverty guidelines or that falls within a locally-developed income threshold that is at least as inclusive.

For service equity analyses conducted by GoRaleigh, persons with household incomes at or below 150 percent of the federal poverty level for a regionally average household size are determined to be low-income, a more inclusive threshold than the poverty guidelines. A low-income population is further defined by FTA as any readily identifiable group of low-income persons who live in geographic proximity or who may be geographically dispersed, but who may be similarly affected by a proposed action.

## **MAJOR SERVICE CHANGE POLICIES AND THRESHOLDS**

GoRaleigh is required by FTA to define “major service change” and develop policies for evaluating impacts of proposed major service changes to minority and low-income populations. GoRaleigh’s approved definition of “major service change” triggering further analysis is as follows:

- The addition or elimination of a route;
- A 25 percent expansion or reduction in route-miles or revenue vehicle miles;
- A 25 percent expansion or reduction in the span of service or frequency of any route, as measured in revenue vehicle hours; or
- The expansion or reduction in regular days of service on any route
- A system-wide change concurrently affecting five percent or more of the total system revenue hours.

In addition to defining major service changes, FTA requires that agencies establish thresholds for evaluating the impacts of proposed major service changes. As mentioned in the previous section, both a disparate impact and disproportionate burden policy is included in the GoRaleigh Title VI program.

- *Disparate Impact policy*- GoRaleigh consider impacts to be disparate any time adverse impacts borne by minority populations differ from impacts borne by non-minority populations by **5%**.
- *Disproportionate Burden policy*- GoRaleigh considers impacts to be disproportionate any time adverse impacts borne by low-income populations differ from impacts borne by non-low-income populations by **2.5%**.

Both thresholds are evaluated based on the population data from the US Census Bureau and apply to the difference in the minority or low-income population or ridership on the affected routes compared to the minority or low-income populations served by the system overall.

### **Service Area Populations**

The following section describes the minority and low-income populations of GoRaleigh’s existing service area. The service area includes a quarter-mile buffer around all existing GoRaleigh bus routes. **Table 1** summarizes the population data for the existing GoRaleigh service area.

**Table 1: GoRaleigh Service Area Demographics**

<b>Total Service Population</b>	<b>Minority Population</b>		<b>Low-Income Population</b>	
<b>232,837</b>	<b>110,830</b>	<i>47.60%</i>	<b>62,633</b>	<i>26.90%</i>
<p><b>Note:</b> Demographic data from the US Census Bureau, 2015-2019 American Community Survey (ACS) 5-Year Estimates, which included:</p> <ul style="list-style-type: none"> <li>• Population coded by table B03002, field B03002001.</li> <li>• Low-income status is set at 150% of the US federal poverty level, which is coded by the appropriate fields in table C17002.</li> <li>• Minority coded by table B03002, which subtracts the white, non-Hispanic population (B03002003) from the total population (B03002001).</li> </ul>				

**Major Service Change Impacts**

Based on **Table 2**, the proposed service changes are classified as a “major service change”. **Table 3** summarizes the proposed service changes and its association to the major service change thresholds criteria. Both routes are proposed for additional frequency and extended service spans. However, Route 70X’s route path is shortened to no longer serve Crabtree Valley Mall but to terminus at Pleasant Valley Promenade.

**Table 2: Service Threshold**

	<b>Route Vehicle Miles (Annual)</b>	<b>Route Vehicle Hours (Annual)</b>
<b>Current Route 6</b>	<b>142,666</b>	<b>11,432</b>
<b>Proposed Route 6</b>	<b>440,178</b>	<b>34,335</b>
	<b>209% increase</b>	<b>200% increase</b>
<b>Current Route 70X</b>	<b>55,879</b>	<b>2,894</b>
<b>Proposed Route 70X</b>	<b>110,568</b>	<b>6,782</b>
	<b>98% increase</b>	<b>134% increase</b>

**Table 3: Impacts of Proposed Service Changes**

Route	Description of Current Service	Description of Proposed Changes	Service Threshold Comparison
<p><b>6 Glenwood</b></p>	<p>Travels from downtown Raleigh to Duraleigh Road</p> <p><i>Weekday:</i></p> <ul style="list-style-type: none"> <li>○ 6am to 9am</li> <li>○ 30-minute frequency during AM and PM peak hours</li> <li>○ 1-hr frequency during non-peak hours</li> </ul> <p><i>Saturday:</i></p> <ul style="list-style-type: none"> <li>○ 7am to 10pm</li> <li>○ 1-hr frequency all day</li> </ul> <p><i>Sunday:</i></p> <ul style="list-style-type: none"> <li>○ 7am to 10pm</li> <li>○ 1-hr frequency all day</li> </ul>	<p><i>Weekday:</i></p> <ul style="list-style-type: none"> <li>○ Service extended to 11pm</li> <li>○ 15-minute frequency, from 7am to 7pm</li> <li>○ 30-minute frequency, before 7am and after 7pm</li> </ul> <p><i>Saturday:</i></p> <ul style="list-style-type: none"> <li>○ Service extended to 11pm</li> <li>○ 15-minute frequency, from 7am to 7pm</li> <li>○ 30-minute frequency, before 7am and after 7pm</li> </ul> <p><i>Sunday:</i></p> <ul style="list-style-type: none"> <li>○ Service extended to 10pm</li> <li>○ 30-minute frequency all-day</li> </ul>	<ul style="list-style-type: none"> <li>☑ <b>A 25 percent expansion</b> or reduction in route-miles or revenue vehicle miles</li> <li>☑ <b>A 25 percent expansion</b> or reduction in the span of service or frequency of any route, as measured in revenue vehicle hours</li> </ul>
Route	Description of Current Service	Description of Proposed Changes	Service Threshold Comparison
<p><b>70X Briar Creek Express</b></p>	<p>Travels from Briar Creek Commons to Crabtree Valley Mall</p> <p><i>Weekday:</i></p> <ul style="list-style-type: none"> <li>○ AM and PM peak service only</li> <li>○ 1-hr frequency</li> </ul>	<p>Route will travel from Briar Creek Commons to Pleasant Valley Promenade</p> <p><i>Weekday:</i></p> <ul style="list-style-type: none"> <li>○ 6am to 11pm</li> <li>○ 1-hr frequency, all-day service</li> </ul> <p><i>Saturday:</i></p> <ul style="list-style-type: none"> <li>○ 6am to 11pm</li> <li>○ 1-hr frequency, all-day service</li> </ul> <p><i>Sunday:</i></p> <ul style="list-style-type: none"> <li>○ 6am to 10pm</li> <li>○ 1-hr frequency, all-day service</li> </ul>	<ul style="list-style-type: none"> <li>☑ <b>A 25 percent expansion</b> or reduction in route-miles or revenue vehicle miles</li> <li>☑ <b>A 25 percent expansion</b> or reduction in the span of service or frequency of any route, as measured in revenue vehicle hours</li> </ul>

## EVALUATION OF IMPACTS

Based on the data in **Table 3**, minority and low-income population percentages for both routes are below the system threshold. Populations percentages for both route service changes are also identified as below system average.

Minority and low-income population counts and percentages for Route 6 will not change based on the proposed services. Although the minority and low-income percentages will decrease for Route 70X, the proposed changes will serve double the population, despite the decreased route path. In addition, the population count for both identified groups will almost double due to additional areas being served by the proposed route path. **(Refer to Figure 3)**

Based on operations, the proposed 70X service change will no longer serve Crabtree Valley Mall but end at Pleasant Valley Promenade. The increased transfers for customers traversing downtown, could create a negative impact. However, this is mitigated by the 15-minute frequency and decreased wait times provided by Route 6.

In addition, the decreased route path of the 70X will positively impact the route's ability to travel efficiently. Prior to the COVID-19 pandemic, the 70X frequently performed below satisfactory for on-time performance (OTP), **Table 4**. The system's goals for OTP is at least 85-90%. This performance issue is attributed to the traffic congestion along Glenwood Avenue, as it approaches Crabtree Valley Mall. However, by shortening the route path and pairing the 70X with a high frequency service to downtown (Route 6), the route package can meet on-time goals and enhance rider experience.

Lastly, the Pleasant Valley transit stop (ID 8364) has been identified for additional passenger enhancements, which will include a larger shelter, lighting, and digital signage. These enhanced amenities, along with the increased services, will improve the overall rider experience, benefit all populations, and further support minority and low-income populations utilizing the system.

**Based on the data in this assessment and the anticipated increase in services, no adverse impacts were identified to affect low-income and minority populations. Any negative potential impacts due to a possible increase in transfers, can be mitigated by the high frequency downtown service, the enhanced passenger amenities, and the overall improvement in on-time performance.**

**No disparate or disproportionate impact to minority and low-income populations were identified and no additional mitigation efforts or strategies are needed at this time.**



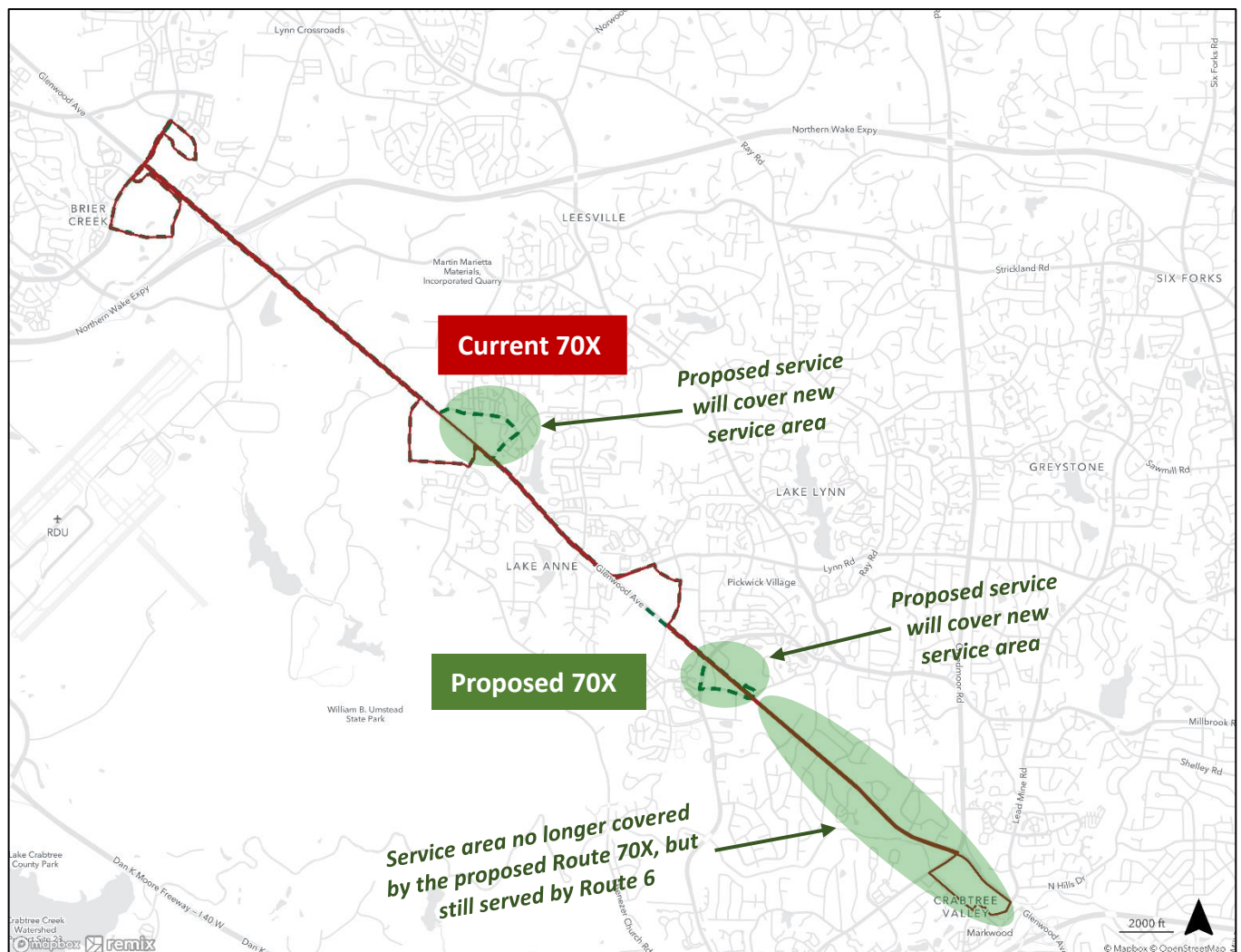
**Table 3: Impacts of Proposed Service Changes**

Route	6 Glenwood		70X Briar Creek Express		GoRaleigh System
Description	<i>Additional frequency; Extended service span; No change in service area</i>		<i>Additional Frequency; Increased service span; change to route path</i>		
	Existing Route	Proposed Route	Existing Route	Proposed Route	
Total Population	16,610	16,610	4,229	8,753	232,837
Minority #	3,704.03	3,704.03	1,518.21	3,098.56	110,830.41
Minority %	22.30%	22.30%	35.90%	35.40%	47.60%
Low-Income #	2,441.67	2,441.67	587.83	927.82	62,633.15
Low-Income %	14.70%	14.70%	13.90%	10.60%	26.90%

**Table 4: On-Time Performance for Route 70X (Pre-COVID)**

Month	Oct 2019	Nov 2019	Dec 2019	Jan 2020	Feb 2020	Mar 2020
On-Time Percentages	56%	60%	56%	64%	71%	77%

**Figure 3: Current and Proposed 70X Route**



## PUBLIC INVOLVEMENT

Under FTA Circular 4702.1B Title VI guidelines, recipients of federal financial assistance are required to establish a public participation plan that describes the proactive strategies, procedures, and desired outcomes for public participation activities. GoRaleigh's most recent Public Participation Plan was updated February 2021, during the Title VI Plan Update.

Promoting inclusive public participation is a central consideration for the FTA Circular 4702.1B, which further requires integrating the content and considerations of Title VI, the Executive Order on LEP, and the DOT LEP Guidance into the public participation process for any federally-funded service area changes.

Prior to the COVID-19 pandemic, public engagement efforts were completed through the FY 2021 Annual Work Plan in February 2020. This included online postings and presentations to stakeholders at the local and regional level. GoRaleigh specifically targeted well known stakeholders, like Healing Transitions Women's Shelter, and presented to 70+ participants who frequent the 70X and 6. The presentations were met with overall favorable support, with inquiries about future accommodations at the Pleasant Valley stop.

In consideration of the time that has passed since the initial FY 2021 engagement effort, GoRaleigh staff relaunched an engagement effort to gauge customer feedback about the anticipated changes. In consideration of public health precautions, transit staff used all available avenues to engage with the public, while maintaining CDC-recommended social distancing. Information was distributed and/or accessed in a variety of ways, to include but not limited to:

- Updated project page on the GoRaleigh website,
- Email blast to identified local stakeholders within the route areas, and
- Frequent social media postings

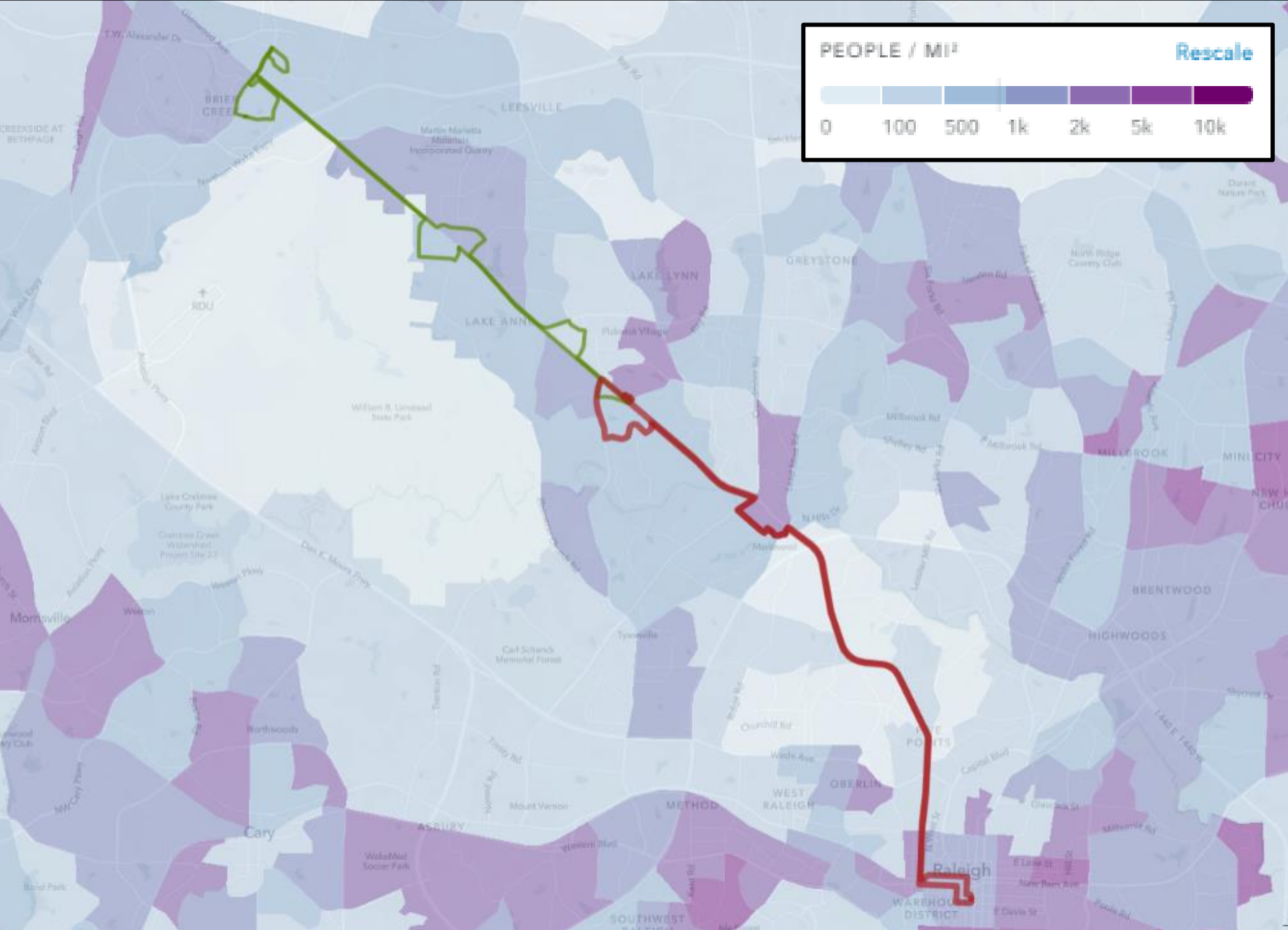
The public comments collected during the month of April were overall favorable and supported the anticipated changes.

The image displays two screenshots from the GoRaleigh website and social media. The top screenshot shows a social media post from 'goraleighnc' with the text: 'More Frequency Means More Time for You! Changes are coming for Route 6 and 70X! Learn more at goraleigh.org/glenwood-corridor'. The bottom screenshot shows a website article titled 'Proposed Additional Frequency for Route 6 and 70X' dated April 5, 2021. The article text includes: 'GoRaleigh is proposing adding additional service to the two routes along Glenwood Avenue. This will help better serve our riders and major destinations including Crabtree Valley Mall, downtown Raleigh and Brier Creek Commons. Specifics: Route 6: Crabtree will become GoRaleigh's next high frequency network route from downtown Raleigh to Duraaleigh Road, operating every 15 minutes, Monday through Saturday from 7 a.m. until 7 p.m. Also, it will extend frequency on Sundays to every 30 minutes. This is in addition to the current service. This change also offers longer service hours, with last trips running in the 11 p.m. hour Monday through Saturday and 10 p.m. on Sunday. Route 70X: Brier Creek Express, serving Glenwood Avenue north of Duraaleigh Road to Brier Creek Commons, will begin all-day service Monday through Sunday. The new connection location will be at Pleasant Valley Shopping Center. This route will no longer serve Crabtree Valley Mall directly.' A map at the bottom of the article shows the routes: '6 Crabtree HFR' and '70X Brier Creek'.

## **APPENDICES**

- **Appendix A: Minority Populations, by Census Tracts**
- **Appendix B: Low-Income Populations, by Census Tracts**

# Appendix A: Minority Populations, by Census Tracts [w/ proposed services]



## Appendix B: Low-Income Populations, by Census Tracts [w/ proposed services]

